

December 4, 2014

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: Response Comments of the Minnesota Department of Commerce, Division of Energy Resources
Docket No. PL9/CN-14-916

Dear Dr. Haar:

The Minnesota Department of Commerce, Division of Energy Resources (Department) filed its Comments in the above-referenced docket on November 13, 2014, with recommendations on various requests by Enbridge Energy, Limited Partnership (Enbridge) regarding the expected petition for a certificate of need to replace and increase the size of Enbridge's Line 3.

In response, on November 26, 2014, Enbridge filed Reply Comments that provided further information (such as more specifics about the alternative information that Enbridge proposes to provide).

The Department concludes that the information Enbridge provided addresses the questions and issues noted in the Department's November 13, 2014 Comments, as discussed below.

As a result, the Department recommends that the Minnesota Public Utilities Commission (Commission):

- approve the Notice Plan upon receipt of either:
 - an update Revised Attachment 3a to correct the discrepancies noted in the body of these Comments; or
 - a filing from Enbridge indicating that it has investigated the discrepancies noted by the Department and found Attachment 3a to be correct as it currently exists;
- require Enbridge to file the following if Enbridge's preferred route is not chosen in the Sandpiper proceeding:
 - a proposal to supplement the Notice Plan; along with updates to Attachments 1-4a of the original Notice Plan Proposal, within 60 days of the Sandpiper decision; and
 - a compliance filing indicating implementation of the supplemental Notice Plan, within 90 days of the Sandpiper decision;
- grant Enbridge's requested variance to Minnesota Rule Part 7829.2560, subpart 1;

- grant Enbridge's requests to submit alternative data to satisfy the requirements of various Minnesota Rules and its requests for exemptions from various Minnesota Rules; and
- require Enbridge to serve all documents currently available in this docket's eDockets record on the service lists on record in the Sandpiper, Docket No. PL- 6668/CN-13-473, and Line 67 Upgrade, Docket No. PL-9/CN-13-153, projects.

The Department does not oppose approval of Enbridge's petitions for a Protective Order, an Order Establishing a Separate Docket for Highly Sensitive Nonpublic Data, and a Protective Order for Highly Sensitive Nonpublic Data, as long as certain changes recommended by the Department are incorporated into the protective orders.

The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ LAURA B. OTIS
Rates Analyst
651-539-1828
LBO/ja

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE
DIVISION OF ENERGY RESOURCES

DOCKET NO. PL9/CN-14-916

I. NOTICE PLAN

A. CONTENT

Enbridge states that it received minor comments from Commission staff pertaining to contact and mailing list information that is to be included in notice letters. Updated letters with changes reflecting those comments were filed as attachments 2, 3, and 4 to Enbridge's Reply Comments. The Department has reviewed the revised letters and recommends that the Commission accept the letters as revised.

B. NOTICE LISTS

In its initial Comments, the Department stated that the list of government and elected officials included the appropriate jurisdictions but noted that since the Petition was filed prior to the November 4, 2014 elections, an update would be required. Enbridge provided that update as Revised Attachment 3a, as attached to its Reply Comments. The Department has confirmed that the appropriate agencies and jurisdictions have been included and has also compared the updated list to the election results available on the website of the Minnesota Secretary of State¹. Generally, the Department's review showed that Enbridge accurately updated the list of state and local officials that are to receive notice. However, the review revealed several inconsistencies between the information filed in Enbridge's revised Attachment 3a and the information available on the Secretary of State's website. Inconsistencies were found for the following:

- The Minnesota House Minority and Majority leaders;
- The Minnesota Speaker of the House;

¹ <http://electionresults.sos.state.mn.us/>

- The Chairman of the Red Lake Band of Chippewa²;
- One or more Township officials for Numedal Township in Pennington County;
- One or more City officials for the City of Trail in Polk County;
- One or more Township officials for Helga Township in Hubbard County;
- One or more County Officials for Cass County;
- One or more City officials for the City of Floodwood in St. Louis County;
- One or more County Officials for Carlton County;
- One or more Township officials for Perch Lake Township in Carlton County;
- One or more City officials for the City of Cloquet in Carlton County;
- One or more Township officials for Blind Lake Township in Cass County;
- One or more City officials for the City of Pine River in Cass County;
- One or more Township officials for Northwest Aitkin Unorganized Territory in Aitkin County; and
- One or more City officials for the City of Cromwell in Carlton County.

The Department also recommended that Enbridge include the Commissioner of Agriculture in the notice plan, as required by Minnesota Statutes 216B.243, subd.7. Enbridge made this addition in the updated notice list provided as Revised Attachment 3a.

The Department recommends that the Commission approve the Notice Plan upon receipt of either:

- an update Revised Attachment 3a to correct the discrepancies noted above; or
- a filing from Enbridge indicating that it has investigated the discrepancies noted by the Department and found Attachment 3a to be correct as it currently exists.

C. *SUPPLEMENTAL NOTICE*

In its Comments, the Department recommended that the Commission require Enbridge to prepare a supplemental notice that would be filed in the event that Enbridge's preferred route is not chosen in the Sandpiper³ proceeding. The Department recommended that the Commission require Enbridge to file the following:

- a proposal to supplement the Notice Plan; along with updates to Attachments 1-4a of the original Notice Plan Proposal, within 60 days of the Sandpiper decision; and
- a compliance filing indicating implementation of the supplemental Notice Plan, within 90 days of the Sandpiper decision.

² Enbridge uses "Red Lake Band of Ojibwe", but online sources use "Red Lake Band of Chippewa". See <http://www.redlakenation.org/>

³ Docket No. PL6668/CN-13-473

Enbridge states in its Reply Comments that while it understands that it may be required to provide supplemental notice if alternatives are proposed and accepted in this proceeding, it requests that the Commission defer the issue of supplemental notice. Enbridge argues that due to the different nature of the L3R project as compared to the Sandpiper project, ruling on supplemental notice would be premature.

The Department does not disagree that requiring supplemental notice at this time would be premature. This is why the Department recommends requiring a proposal to supplement the notice plan *within 60 days of the Sandpiper decision*. Enbridge would not be required to take action until 60 days after a decision on the Sandpiper route has been made, if at all. However, it is appropriate to anticipate this issue now to avoid further delay in the proceedings or an unintentional failure to provide adequate notice. Thus, the Department continues to recommend that the Commission require Enbridge to file

- a proposal to supplement the Notice Plan; along with updates to Attachments 1-4a of the original Notice Plan Proposal, within 60 days of the Sandpiper decision; and
- a compliance filing indicating implementation of the supplemental Notice Plan, within 90 days of the Sandpiper decision.

II. EXEMPTION REQUESTS

In its Comments, the Department requested that Enbridge describe more clearly what Enbridge proposes to provide as a substitute for the information required by Minnesota Rule 7853. The Department concludes that Enbridge's proposals are acceptable for the following reasons:

A. *MINNESOTA RULE 7853.0510, SUBP. 1(B) – PEAK DAY QUANTITIES HISTORICAL DATA*

Rather than providing historical data on peak day quantities of crude oil shipped on the Mainline system, Enbridge proposes to provide monthly and annual nominations and throughput for light and heavy crude oil for the previous five calendar years and other information required by this rule. The Department concludes that this proposal is acceptable because more granular data does not exist.

B. *MINNESOTA RULE 7853.0510, SUBP. 1(C) – CONTRACTS WITH 25 LARGEST SHIPPERS*

Rather than providing contract information, which does not exist, Enbridge proposes to provide data from shippers' monthly nomination forms to meet the "contract" data requirement under the rule and to show historical demand for capacity on the Enbridge system, including Line 3. The Department requested further description of the information

Enbridge proposes to provide in lieu of contracts and that it provide a copy of its Federal Energy Regulatory Commission (FERC) tariff showing its common carrier status. Enbridge provided the information the Department requested in Exhibit F (FERC Tariff) and Exhibit G (blank nomination form). Additionally Enbridge described the data that will be provided from the nomination forms, which includes the shippers' identities, the dates, volume, product type and delivery points for nominations and estimated tariff costs. Enbridge proposes to provide aggregate delivery totals by product and to group the delivery points by deliveries made in Minnesota, namely Enbridge's Clearbrook terminal, and deliveries made in total to all points beyond Minnesota. However, Enbridge states that it will not provide detailed information regarding nominations and deliveries attributable to specific shippers outside of a separate docket and without special protections. The Department concludes that this proposal is acceptable because, with the exception of contract durations⁴, all of the contract data required by Minnesota Rules will be provided with the nomination form data.

C. MINNESOTA RULE 7853.0520(B) – PEAK DAY QUANTITIES FORECAST DATA

Rather than providing peak day forecasts, Enbridge agrees to provide monthly forecast data of light and heavy crude supply available to Enbridge. Enbridge proposes to provide annual quantity information and any other information required by this rule. The Department concludes that this proposal is acceptable because Enbridge has agreed to provide the alternative data that the Department identified in its initial Comments.

D. MINNESOTA RULE 7853.0530, SUBP. 3(D) – EXPECTED SOURCES OF SUPPLY AND SHIPPERS

Rather than providing a list of expected sources of supply or shippers of petroleum products, designations as either in-state or as out-of-state, the expected dates and durations of the contracts with the 25 largest suppliers or shippers, the categories of petroleum products and quantities expected to be involved, sources of crude oil, and the expected geographical areas of origin of the crude oil based on shipper contracts, Enbridge proposes to provide this data (with the exception of dates and durations of contracts) based on shipper nomination forms, which provide shipper names. The Department concludes that this proposal is acceptable because shipper contracts do not exist due to the nature of Enbridge's FERC Tariff and because Enbridge will provide nomination form data that is similar to that which is required by Minnesota Rules.

E. MINNESOTA RULE 7853.0530, SUBP. 3(E) – EXPECTED RECIPIENTS

Rather than providing the expected dates and durations of contracts with the 25 largest recipients of crude oil shipped on Line 3, Enbridge proposes to provide an analysis of the

⁴ Due to the nature of Enbridge's mainline system FERC Tariff, long term shipper agreements (and thus data on duration) do not exist.

demand for light and heavy crude oils in markets served by Enbridge and its affiliate pipelines. The Department concludes that this proposal is acceptable because it is not possible to provide the specific data required by this Rule due to the nature of Enbridge's FERC tariff. The information Enbridge proposes to provide in this exemption request is adequate for completeness purposes, but the Department or other intervenors may require additional information to complete their analyses of the need for the project.

III. PROPOSED ORDERS

In its initial Comments, the Department recommended that the Commission deny as premature Enbridge's requests to establish a protective order, a separate docket for highly sensitive nonpublic data, and a special protective order for highly sensitive nonpublic data. Enbridge's Reply Comments describe the data that would be withheld from its certificate of need (CN) filing until a separate docket, a protective order, and a special protective order for highly sensitive nonpublic data are in place. Since this information is critical to assessing the proposal, the Department concludes that early approval of these petitions would be beneficial.

Specifically, it is the Department's understanding that Enbridge would withhold data from historical shipper nomination forms until the protective orders and the separate docket are in place. Because this data is essential for analysis of the need for the project, timely receipt of this information is important. Thus, the Department no longer opposes Enbridge's requests that a separate docket be opened for the purpose of filing data such as historical shipper nomination data which the Company states is highly sensitive nonpublic data, and that protective orders for both dockets be established.

The Department does not oppose the Petition for an Order Establishing a Separate Docket for Highly Sensitive Nonpublic Data as originally filed.

The Department has reviewed Enbridge's proposed Protective Orders, for MPUC Docket No. PL9/CN-14-916 and for an affiliated separate docket MPUC Docket No. PL9/CN-14-____ (for protection of "Highly Sensitive Trade Secret Information"), that closely track the language of the protective orders issued by Administrative Law Judge Eric Lipman in MPUC Docket Nos. PL-6668/CN-13-473 and PL-6668/CN-14-954. With minor suggested edits discussed below, the Department does not oppose either proposed Protective Order.

A. *PROPOSED PROTECTIVE ORDER FOR MPUC DOCKET NO. PL9/CN-12-916*

The Department suggests one edit to Enbridge's proposed Protective Order for this Docket, MPUC Docket No. PL9/CN-12-916:

- Page two, paragraph 1(c): retain the commonly used and understood term “outside experts” rather than accept Enbridge’s edit which uses the term “any retained expert”, as follows:

(c) Experts. A Government Agency shall not provide Nonpublic Data to outside experts ~~any retained expert~~ providing assistance on this matter until the outside expert has signed Exhibit A. These experts shall comply with the terms of this Protective Order except where contrary to the requirements of the MGDPA or Commission Procedures.

B. PROPOSED PROTECTIVE ORDER FOR MPUC DOCKET NO. PL9/CN-14-_____

The Department suggests the following three edits to Enbridge’s proposed Protective Order for a separate docket, MPUC Docket No. PL9/CN-14-_____, for protection of “Highly Sensitive Trade Secret Information”:

- Page one, first sentence, last word: retain the term “data” which is a more comprehensive term under the Minnesota Government Data Practices Act than is Enbridge’s edit which uses the term “information.”
- Page two, numbered paragraph 2: edit paragraph to make clear that Enbridge will include in its public certificate of need (“CN”) petition the aggregate volume of nominations and shipments by product type on the Enbridge Mainline System for the past five years, as follows:

2. ~~In its CN petition in Upon receipt of an appropriate information request from a party in this Docket (No. 14-916),~~ Enbridge shall disclose publically the aggregate volume of nominations and shipments by product type on the Enbridge Mainline System during the past five-year ~~a specific~~ period of time, and ~~will may~~ disclose information that has been set forth in the publicly-available Nomination Form (the “Permitted Shipper Information”).

- Page two, following numbered paragraph 2: add a paragraph to make clear that at the time it files its CN, Enbridge will file in separate Docket (No. 14-_____) (to protect “Highly Sensitive Trade Secret Information”) the “Shipper Information” defined on page one including, in particular, the details relating to each delivery point within PADD 2⁵, as follows:

⁵ PADD stands for “Petroleum Administration for Defense Districts.” Minnesota’s region is generally referred to as “PADD 2.”

2.1 At the same time it files its CN petition in this Docket (No. 14-916) Enbridge will file in the separate docket, MPUC Docket No. PL9/CN-14- the “Shipper Information” defined on page one including, in particular, the details relating to each delivery point within PADD 2, as the Commission determines to require.

IV. SERVICE LIST

Enbridge states that it served the petition in compliance with Minnesota Rules but will comply with the Commission’s order if it requires additional service. The Department agrees that Enbridge has complied with Minnesota Rules pertaining to the Notice Plan Service list, but continues to recommend that the Commission require the Company to serve all documents currently in the record on the service lists on record for the Sandpiper, Docket No. PL-6668/CN-13-473, and Line 67 Upgrade, Docket No. PL-9/CN-13-153, projects.

V. RECOMMENDATIONS

After reviewing Enbridge’s Reply Comments, the Department recommends that the Commission:

- Approve the Notice Plan upon receipt of either:
 - an update Revised Attachment 3a to correct the discrepancies noted in the body of these Comments; or
 - a filing from Enbridge indicating that it has investigated the discrepancies noted by the Department and found Attachment 3a to be correct as it currently exists;
- Require Enbridge to file the following if Enbridge’s preferred route is not chosen in the Sandpiper docket:
 - a proposal to supplement the Notice Plan; along with updates to Attachments 1-4a of the original Notice Plan Proposal, within 60 days of the Sandpiper decision; and
 - a compliance filing indicating implementation of the supplemental Notice Plan, within 90 days of the Sandpiper decision;
- Grant Enbridge’s requested variance to Minnesota Rule Part 7829.2560, subpart 1;
- Grant Enbridge’s requests to submit alternative data to satisfy the requirements under Minnesota Rules 7853.0510, subp. 1(B), Minnesota Rule 7853.0510, subp. 1(C), 7853.0520(B), 7853.0530, subp. 3(D), and 7853.0530, subp. 3(E) and its

requests for exemption from the requirements of Minnesota Rules 7853.0250(B) and 7853.0130(A)(3);

- Approve Enbridge's petitions for a Protective Order, an Order Establishing a Separate Docket for Highly Sensitive Nonpublic Data, and a Protective Order for Highly Sensitive Nonpublic Data as long as the protective orders incorporate the changes discussed in Section III above; and
- Require Enbridge to serve all documents currently available in this docket's eDockets record on the service lists on record in the Sandpiper, Docket No. PL- 6668/CN-13-473, and Line 67 Upgrade, Docket No. PL-9/CN-13-153, projects.

The Department is available to answer any questions that the Commission may have.

/ja

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Response Comments**

Docket No. PL9/CN-14-916

Dated this 4th day of December 2014

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_14-916_CN-14-916
Sarah	Beimers	sarah.beimers@mnhs.org	Minnesota Historical Society	345 Kellogg Boulevard West St. Paul, MN 55102	Electronic Service	No	OFF_SL_14-916_CN-14-916
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000 Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_14-916_CN-14-916
Army	Corp of Engineers	N/A	Army Corps of Engineers	180 5th St E Ste 700 Saint Paul, MN 55101	Paper Service	No	OFF_SL_14-916_CN-14-916
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_14-916_CN-14-916
Kate	Frantz	kate.frantz@state.mn.us	Department of Natural Resources	Box 32 500 Lafayette Rd St. Paul, MN 551554032	Electronic Service	No	OFF_SL_14-916_CN-14-916
Travis	Germundson	travis.germundson@state.mn.us		Board of Water & Soil Resources 520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	OFF_SL_14-916_CN-14-916
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_14-916_CN-14-916
Susan	Heffron	susan.heffron@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	OFF_SL_14-916_CN-14-916
Kari	Howe	kari.howe@state.mn.us	DEED	332 Minnesota St, #E200 1ST National Bank Bldg St. Paul, MN 55101	Electronic Service	No	OFF_SL_14-916_CN-14-916

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ray	Kirsch	Raymond.Kirsch@state.mn.us	Department of Commerce	85 7th Place E Ste 500 St. Paul, MN 55101	Electronic Service	No	OFF_SL_14-916_CN-14-916
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_14-916_CN-14-916
Debra	Moynihan	debra.moynihan@state.mn.us	MN Department of Transportation	395 John Ireland Blvd MS 620 St. Paul, MN 55155-1899	Electronic Service	No	OFF_SL_14-916_CN-14-916
Bob	Patton	bob.patton@state.mn.us	MN Department of Agriculture	625 Robert St N Saint Paul, MN 55155-2538	Electronic Service	No	OFF_SL_14-916_CN-14-916
Michele	Ross	michele.ross@state.mn.us	Department of Health	625 N Robert St Saint Paul, MN 55101	Electronic Service	No	OFF_SL_14-916_CN-14-916
Jamie	Schrenzel	jamie.schrenzel@state.mn.us	Minnesota Department of Natural Resources	500 Lafayette Road Saint Paul, MN 55155	Electronic Service	No	OFF_SL_14-916_CN-14-916
Claudia	Schrull	CLAUDIA.SCHRULL@ENBRIDGE.COM	Enbridge Energy Company, Inc.	Suite 3300 1100 Louisiana Houston, TX 77002	Electronic Service	No	OFF_SL_14-916_CN-14-916
David	Seykora	dave.seykora@state.mn.us	MN Department of Transportation	395 John Ireland Boulevard Mail Stop 130 St. Paul, MN 55155-1899	Electronic Service	No	OFF_SL_14-916_CN-14-916
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	Ste 122 9100 W Bloomington Frwy Bloomington, MN 55431	Electronic Service	No	OFF_SL_14-916_CN-14-916
Mollie	Smith	msmith@fredlaw.com	Fredrikson Byron PA	Suite 4000 200 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_14-916_CN-14-916

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tony	Sullins	tony_sullins@fws.gov	USFWS	4101 American Blvd E Bloomington, MN 55425	Electronic Service	No	OFF_SL_14-916_CN-14-916
James	Watts	james.watts@enbridge.com	Enbridge Pipelines (North Dakota) LLC	26 E Superior St Ste 309 Duluth, MN 55802	Electronic Service	No	OFF_SL_14-916_CN-14-916
Jonathan	Wolfgram	Jonathan.Wolfgram@state.mn.us	Department of Public Safety	445 Minnesota Street Suite 147 St. Paul, MN 55101-1547	Electronic Service	No	OFF_SL_14-916_CN-14-916

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kate	Frantz	kate.frantz@state.mn.us	Department of Natural Resources	Box 32 500 Lafayette Rd St. Paul, MN 551554032	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS
Travis	Germundson	travis.germundson@state.mn.us		Board of Water & Soil Resources 520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS
Kari	Howe	kari.howe@state.mn.us	DEED	332 Minnesota St, #E200 1ST National Bank Bldg St. Paul, MN 55101	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS
Ray	Kirsch	Raymond.Kirsch@state.mn.us	Department of Commerce	85 7th Place E Ste 500 St. Paul, MN 55101	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS
Karen	Kromar	karen.kromar@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS
Susan	Medhaug	Susan.medhaug@state.mn.us	Department of Commerce	Suite 500, 85 Seventh Place East St. Paul, MN 551012198	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS
Debra	Moynihan	debra.moynihan@state.mn.us	MN Department of Transportation	395 John Ireland Blvd MS 620 St. Paul, MN 55155-1899	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS
Bob	Patton	bob.patton@state.mn.us	MN Department of Agriculture	625 Robert St N Saint Paul, MN 55155-2538	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS
Jennie	Ross	jennie.ross@state.mn.us	Minnesota Department of Transportation	395 John Ireland Boulevard, MS 620 St. Paul, MN 55155	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS
Michele	Ross	michele.ross@state.mn.us	Department of Health	625 N Robert St Saint Paul, MN 55101	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS

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Jamie	Schrenzel	jamie.schrenzel@state.mn.us	Minnesota Department of Natural Resources	500 Lafayette Road Saint Paul, MN 55155	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS