



December 2, 2014

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VIA E-FILING AND U.S. MAIL

Dr. Burl Haar
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101

Re: In the Matter of Great River Energy's 2014 Integrated Resource Plan (IRP)
MPUC Docket No. ET2/RP-14-813

Dear Dr. Haar:

Enclosed please find Al-Corn Clean Fuel and Heartland Corn Products' Petition to Intervene in the above-referenced docket. These documents have been filed with the E-Docket system and served on the attached service list. Also enclosed is our Affidavit of Service.

Also, please add the following to your service list:

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Very truly yours,

WINTHROP & WEINSTINE, P.A.

/s/ David M. Aafedt

David M. Aafedt

Enclosures

cc: Service List

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BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

121 Seventh Place East, Suite 350
St. Paul, Minnesota 55101-2147

Beverly Jones Heydinger
Dr. David C. Boyd
Nancy Lange
Dan Lipschultz
Betsy L. Wergin

Chair
Commissioner
Commissioner
Commissioner
Commissioner

In the Matter of Great River Energy's 2014
Integrated Resource Plan (IRP)

MPUC Docket No. ET2/RP-14-813

INTRODUCTION

Pursuant to Minn. R. 7843.0300 and Minn. R. 7829.0800, Al-Corn Clean Fuel (“Al-Corn”) and Heartland Corn Products (“Heartland”) (collectively, “Petitioners”) hereby petition to intervene in the above-referenced docket. As discussed more fully below, the Commission should grant Petitioners’ Petition to Intervene since it has a unique interest that is not represented by other parties to this proceeding. Furthermore, Petitioners can provide relevant information, as well as an independent perspective, to assist the Commission in its consideration of this matter.

BACKGROUND

Al-Corn is a farmer-owned ethanol production cooperative in Claremont, Minnesota. Annually, Al-Corn grinds 17.5 million bushels of corn that are provided by its members and produces 50 million gallons of ethanol. Heartland is a farmer-owned ethanol production cooperative in Winthrop, Minnesota. Heartland produces over 100 million gallons of ethanol annually, in addition to other products, such as corn oil for use in bio-diesel applications. Al-Corn and Heartland seek to enhance the lives and welfare of children and adults around the world through the renewable products they consume and the environment in which they live.

AL-CORN AND HEARTLAND'S PETITION TO INTERVENE

Interested persons may become, or may petition to become, parties under parts 7830.0100 to 7830.4400. Minn. R. 7843.0300, subp. 7. A Petition to Intervene:

must be granted upon the showing that . . . the outcome of the proceeding will bind or affect the persons with respect to an interest peculiar to that person as distinguished from interests common to the public or other rate payers in general, or the person's interests are not adequately represented by one or more of the other parties participating in this case.

Minn. R. 7829.0800, subp. 2.

The Commission's review and consideration of GRE's Integrated Resource Plan ("IRP") will significantly affect Petitioners' business interests. Petitioners' interests are not shared by the public at large, or others involved in this matter, and no other parties participating in this matter will—or could—adequately represent Petitioners' interests.

As substantial consumers of GRE's load, Petitioners seek to participate in this resource planning proceeding before the Commission to ensure that GRE is meeting its obligations to its industrial members to deliver reliable services "at-cost," consistent with Minnesota law. Access to reasonably priced power is a critical component to maintaining the profitability of Petitioners' businesses, as well as other similarly-situated businesses, and the outcome of these proceedings will have a significant impact on Petitioners' ability to deliver much needed products to consumers in Minnesota and elsewhere around the country.

Petitioners and other large industrial customers have significant concerns that, notwithstanding the fact that GRE purports to provide service to its members and, in turn, customers such as Al-Corn and Heartland on a not-for-profit basis, GRE is operating inconsistent with that mission and structure, including incurring significant, questionable costs and pursuing potentially wasteful projects. Furthermore, GRE and its distribution cooperatives pay little

