

ATTORNEYS AND COUNSELORS AT LAW

March 30, 2016

Eric F. Swanson Direct Dial: (612) 604-6511 Direct Fax: (612) 604-6811 eswanson@winthrop.com

VIA EFILING

Daniel P. Wolf Executive Secretary Minnesota Public Utilities Commission 121 East Seventh Place, Suite 350 St. Paul, MN 55101

Re: In the Matter of the Combined Application of North Star Solar PV LLC for a Site Permit and Route Permit for the North Star Solar Electric Power Generating Plant and Associated 115 kV High Voltage Transmission Line in Chisago County
MPUC Docket No. IP6943/GS-15-33

Dear Mr. Wolf:

On February 29, 2016, and again on March 1, 2016, the Zangs, Carey, Carpenter, Glen and Lori Anderson, Bossard and Ramburg families (collectively, "Adjacent Landowners" or "Petitioners") filed a "Petition" with the Minnesota Public Utilities Commission ("Commission"), which the Commission has treated as a Petition for Reconsideration. The Commission has noticed a hearing for March 31, 2016, at which it will consider the Petition.

On March 29, 2016, Petitioners filed a document titled Argument in Support of Petition for Reconsideration ("Argument"), including several attachments. Later on March 29, 2016, Petitioners also attempted to file Supplemental Information ("Supplement"), also including an attachment, and then re-filed the Supplement and attachment on March 30, 2016.

North Star Solar PV LLC ("North Star") respectfully requests that the Commission reject both the Argument and the Supplement as untimely. The administrative record in this matter closed on October 21, 2015. Petitioners had multiple opportunities to participate in this proceeding and present any evidence or arguments prior to the close of the record. The Commission issued its Order Granting Site and Route Permits With Conditions on February 16, 2016. Any Petition for Reconsideration, setting forth all grounds on which Petitioners seek reconsideration, was due no later than March 7, 2016. Petitioners' attempts to get a second (or third) bite at the apple, one or two days before the Commission is scheduled to consider this matter, must be rejected.

Very truly yours,

WINTHROP & WEINSTINE, P.A.

/s/ Eric F. Swanson

Eric F. Swanson

Enclosures

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STATE OF MINNESOTA BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION 121 Seventh Place East, Suite 350

St. Paul, Minnesota 55101-2147

In the Matter of the Combined Application and of North Star Solar PV LLC for a Site Permit and Route Permit for the North Star Solar Electric Power Generating Plant and Associated 115kV High Voltage Transmission Line in Chisago County

MPUC Docket No. IP6943/GS-15-33

AFFIDAVIT OF SERVICE

STATE OF MINNESOTA)
) ss
COUNTY OF HENNEPIN)

Mary G. Holly, of the City of Lake Elmo, County of Washington, the State of Minnesota, being first duly sworn, deposes and says that on the 30th day of March, 2016, she served the attached **Response to Argument and Petition in Support of Reconsideration** to all said persons on the attached Service List, true and correct copies thereof, by eFiling.

/s/ Mary G. Holly MARY G. HOLLY

Subscribed and sworn to before me this 30th day of March, 2016.

/s/ Jane E. Justice

Notary Public

My Commission Expires: January 31, 2020

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Julia	Anderson	Julia.Anderson@ag.state.m n.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_15-33_Official
Eric	Blank	eric.blank@communityener gyinc.com	Community Energy Solar	Three Radnor Corporate Center, Suite 300 100 Matsonford Road Radnor, PA 19087	Electronic Service	No	OFF_SL_15-33_Official
Barbara	Case	barbara.case@state.mn.us	Office of Administrative Hearings	600 N. Robert St. St. Paul, Mn. 55101	Electronic Service	Yes	OFF_SL_15-33_Official
Leigh	Currie	lcurrie@mncenter.org	Minnesota Center for Environmental Advocacy	26 E. Exchange St., Suite 206 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_15-33_Official
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_15-33_Official
Emerald	Gratz	emerald.gratz@state.mn.us	Office of Administrative Hearings	PO Box 64620 Saint Paul, Minnesota 55164-0620	Electronic Service	Yes	OFF_SL_15-33_Official
Mary	Holly	mholly@winthrop.com	Winthrop & Weinstine, P.A.	225 S Sixth St Ste 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-33_Official
Stacy	Kotch	Stacy.Kotch@state.mn.us	MINNESOTA DEPARTMENT OF TRANSPORTATION	395 John Ireland Blvd. St. Paul, MN 55155	Electronic Service	No	OFF_SL_15-33_Official
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_15-33_Official
Brian	Meloy	brian.meloy@stinson.com	Stinson,Leonard, Street LLP	150 S 5th St Ste 2300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-33_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jamie	Schrenzel	jamie.schrenzel@state.mn. us	Minnesota Department of Natural Resources	500 Lafayette Road Saint Paul, MN 55155	Electronic Service	No	OFF_SL_15-33_Official
Janet	Shaddix Elling	jshaddix@janetshaddix.co m	Shaddix And Associates	Ste 122 9100 W Bloomington Bloomington, MN 55431	Electronic Service Frwy	Yes	OFF_SL_15-33_Official
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_15-33_Official
Gerald	Von Korff	jvonkorff@rinkenoonan.co m	Rinke Noonan	PO Box 1497 St. Cloud, MN 56302	Paper Service	No	OFF_SL_15-33_Official
Chase	Whitney	chase.whitney@community energyinc.com	Community Energy Renewables, LLC	1120 Pearl Street, Suite 200 Boulder, CO 8-3-2	Electronic Service	No	OFF_SL_15-33_Official
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_15-33_Official