

APPENDIX E

COMMISSION ORDER ON EXEMPTION REQUEST AND NOTICE PLAN

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

In the Matter of the Application of Minnesota Power for a Certificate of Need for the Duluth Loop Reliability Project in St. Louis County

ISSUE DATE: May 17, 2021

DOCKET NO. E-015/CN-21-140

ORDER APPROVING NOTICE PLAN AND GRANTING VARIANCES AND EXEMPTIONS

PROCEDURAL HISTORY

On February 26, 2021, Minnesota Power filed a notice-plan petition and a separate request for exemptions from certain data requirements, related to its forthcoming certificate-of-need application for the proposed Duluth Loop Reliability Project in St. Louis County. The notice-plan petition contained requests for variances to notice-timing and newspaper-publication rules.

On March 22, 2021, the Department of Commerce, Division of Energy Resources (the Department) filed comments recommending that the Commission deny the newspaper-notice variance, grant a notice-timing variance, approve Minnesota Power’s proposed notice plan, and approve the data-exemption requests with a modification and conditions.

On April 7, 2021, Minnesota Power filed reply comments.

On April 22, 2021, the Commission met to consider the matter.

FINDINGS AND CONCLUSIONS

I. The Proposed Project

Minnesota Power proposes to construct the Duluth Loop Reliability Project, which would consist of (1) a new 115-kilovolt (kV) transmission line, longer than 10 miles, connecting the existing Hilltop substation in southwest Duluth and the existing Ridgeview substation in northeast Duluth; (2) a one-mile-long extension of the existing Hilltop 230-kV tap to the Arrowhead substation; (3) expansion and transmission-line reconfigurations at the Hilltop and Ridgeview substations, and (4) associated upgrades at the existing Haines Road and Arrowhead substations.

Minnesota Power contends that the project is needed to replace the system support formerly provided by coal-fired baseload generators along the north shore of Lake Superior, to address

voltage-stability concerns, to relieve transmission-line overloads, and to enhance the reliability of Duluth-area transmission. Minnesota Power intends to have the project in service in 2025.

As a high-voltage transmission line with a capacity of 100 kV or more with more than 10 miles of length in Minnesota, the proposed project constitutes a “large energy facility” under Minn. Stat. § 216B.2421, subd. 2(3) and a “high-voltage transmission line” under Minn. R. 7849.1100, subp. 5. Therefore, the project may not be sited or constructed without a certificate of need.¹ Minnesota Power plans to file a combined application for a certificate of need and a route permit for the project in the summer of 2021.

II. Notice Plan

A. Applicable Law and Rules

An initial step in the certificate-of-need process is the approval of a notice plan. At least three months before filing a certificate-of-need application for a high-voltage transmission line, the applicant must file a plan for providing notice to all persons reasonably likely to be affected by the proposed line.² The purpose of the notice plan is to ensure that potentially affected people will be informed of the proposed project and of opportunities to participate in the proceedings.

Minn. R. 7829.2550, subp. 3, requires that the plan include direct mail notice to landowners, mailing addresses, tribal governments, and municipal and county governments reasonably likely to be affected, in addition to newspaper notice in areas reasonably likely to be affected.

Minn. R. 7829.2550, subp. 4, sets forth the content an applicant must include in the notice.

B. Notice-Plan Petition

Minnesota Power filed a petition seeking Commission approval of its notice plan for the Duluth Loop Reliability Project. The proposed notice plan summarizes how Minnesota Power plans to provide direct mail notice to those likely to be affected, including an explanation of the methods Minnesota Power will use to identify individuals, properties, tribal government officials, and local governments that may be affected and should receive direct notice. The proposed plan also states that Minnesota Power intends to notify members of the public by placing advertisements in three regional newspapers in St. Louis County: Duluth News Tribune, Hermantown Star, and Proctor Journal. Additionally, the proposed notice plan contains a list of information and a map of potential proposed routes that Minnesota Power intends to include in the notice.

C. Party Comments

The Department analyzed Minnesota Power’s notice plan under the applicable rules and concluded that the plan is reasonable and meets the requirements of Minn. R. 7829.2550, subps. 3 and 4. Therefore, the Department recommended approval of Minnesota Power’s notice plan.

¹ Minn. Stat. § 216B.243, subd. 2.

² Minn. R. 7829.2550, subp. 1.

D. Commission Action

The Commission agrees with the Department's analysis and finds that the proposed notice plan meets the requirements of Minn. R. 7829.2550. Therefore, the Commission will approve Minnesota Power's proposed notice plan.

III. Variance Requests

The Commission will grant a variance to its rules when the following criteria are met:

(A) enforcement of the rule would impose an excessive burden upon the applicant or others affected by the rule; (B) granting the variance would not adversely affect the public interest; and (C) granting the variance would not conflict with standards imposed by law.³

A. Minn. R. 7829.2550, subp. 6

Minn. R. 7829.2550, subp. 6, requires an applicant to implement its notice plan within 30 days of Commission approval of the plan. Minnesota Power requested a variance to allow notice no more than 60 days and no fewer than 14 days before it files the certificate-of-need application.

The Department reviewed Minnesota Power's request under the variance criteria of Minn. R. 7829.3200 and concluded that enforcement of the rule would burden all parties by separating the provision of notice from the start of the proceeding that is the subject of the notice. Additionally, the Department argued that granting the variance would not adversely affect the public interest; to the contrary, tying the timing of the notice more closely to the timing of the application would serve the public interest. Finally, the Department stated that it was not aware of any legal standards that would conflict with the variance. Therefore, the Department recommended that the Commission grant a variance to Minn. R. 7829.2550, subp. 6.

The Commission agrees with the Department's analysis and finds that this variance meets the criteria of Minn. R. 7829.3200, subp. 1. Therefore, the Commission will vary the 30-day implementation requirement of Minn. R. 7829.2550, subp. 6, to allow Minnesota Power to implement the approved notice plan no more than 60 days and no fewer than 14 days before it files a certificate-of-need application for the Duluth Loop Reliability Project.

B. Minn. R. 7829.2500, subp. 5

1. Minnesota Power's Request

In addition to the Minn. R. 7829.2550 notice required before filing an application for a certificate of need, discussed above, Minn. R. 7829.2500, subp. 5, requires the applicant to publish another notice "in newspapers of general circulation throughout the state" when the application is filed. Minnesota Power requested a variance waiving the latter notice requirement of Minn. R. 7829.2500, subp. 5.

Minnesota Power argued that the cost of advertising in a newspaper of general statewide circulation would constitute an excessive financial burden. Additionally, assuming it would be

³ Minn. R. 7829.3200, subp. 1.

allowed to implement its notice plan 14 to 60 days before filing its application,⁴ Minnesota Power argued that it would be excessive to require a second notice relating to the project in any newspaper upon the filing of the application, so soon after the pre-application notice.

Minnesota Power contended that the requested variance would not adversely affect the public interest because interested persons will have had an opportunity to see the previous notice in three regional newspapers based in St. Louis County, and because statewide-newspaper readers who do not read a St. Louis County newspaper and are not identified to receive direct notice are unlikely to be interested in the proposed project.

Alternatively, if the Commission declined to vary the statewide-newspaper requirement, Minnesota Power requested permission publish a smaller, quarter-page notice, to reduce costs.

2. Party Comments

The Department stated that Minnesota Power had not provided sufficient evidence that compliance with the newspaper notice requirement would constitute an excessive burden within the meaning of the first criterion for a variance under Minn. R. 7829.3200, subp. 1.

The Department asserted that the second variance criterion was not met because removing a required notice opportunity is contrary to the public interest. The Department argued that thorough notice is crucial to ensure members of the public become aware of a certificate-of-need proceeding and remain aware of its progress so they may participate and affect the outcome.

Because the first two variance criteria were not met, the Department recommended that the Commission deny Minnesota Power's request for a variance to Minn. R. 7829.2500, subp. 5.

3. Commission Action

The Commission appreciates Minnesota Power's efforts to identify and communicate with those most likely to be affected by the proposed project. However, Minn. R. 7829.2500, subp. 5, reflects a policy principle that the public interest is served when reasonable efforts are taken to ensure everyone who may be interested in a transmission project is afforded notice and an opportunity to participate. The Commission is not persuaded that Minnesota Power's financial concern in this case compels a variance under Minn. R. 7829.3200, subp. 1. Therefore, the variance is denied.

To mitigate the concern about the cost of larger advertisements, the Commission will allow Minnesota Power to meet the requirement using a quarter-page notice.

IV. Data-Exemption Requests

Chapter 7849 of the Minnesota Rules sets forth requirements for an application for a certificate of need for a large high-voltage transmission line.

Under Minn. R. 7849.0200, subp. 6, a prospective applicant will be exempted from the data requirements of Minn. R. 7849.0010 to 7849.0400 if the person files a written exemption request

⁴ See above discussion of Minnesota Power's notice-timing variance request.

at least 45 days before submitting a certificate-of-need application and shows that the requirement is unnecessary to determine the need for the proposed facility or may be satisfied by submitting alternative data.

A. Exemption Requests

Minnesota Power requested exemptions from the data requirements of the following Minnesota Rules:

- 7849.0260, subps. A(3) and C(6);
- 7849.0270, subp. 1: System Wide Data;
- 7849.0270, subps. 2(A) and 2(B): Customer Class Information;
- 7849.0270, subp. 2(C) and 2(D): System Demand and Peak Demand;
- 7849.0270, subp. 2(E): System Revenue Requirements;
- 7849.0270, subp. 2(F): Weekly Load Factor;
- 7849.0270, subps. 3-6: Forecast Methodology, Data Base Assumptions, and Coordination of Forecasts;
- 7849.0280: System Capacity;
- 7849.0290: Conservation;
- 7849.0300: Consequences of Delay; and
- 7849.0340: Alternative of No Facility.

For most of these requirements, Minnesota Power proposed to submit substitute data it argued would be more relevant to the proposed project. For example, because the project is designed to serve a specific geographical area, Minnesota Power proposed to submit local data in lieu of some of the systemwide data requirements. And because the project is intended to address peak-demand issues, Minnesota Power proposed to substitute certain demand-forecast data with historical-load data and narrow certain data categories to focus on peak times.

B. Party Comments

The Department analyzed the exemption requests and substitute-data proposals and—with one exception, discussed below—agreed with Minnesota Power’s arguments regarding each item’s relevance or irrelevance to the need analysis for this particular proposed project.

Although the Department agreed with Minnesota Power that the data required in subparts B through I of Minn. R. 7849.0280 primarily relate to generators and, therefore, are not relevant to this proposed transmission project, the Department did not agree that a full exemption from subpart A of that rule was appropriate. The Department recommended that the Commission require Minnesota Power to provide data required by subpart A, regarding system-capacity planning, for the applicable load area.

In sum, with the exception of Minn. R. 7849.0280, subp. A, the Department recommended that the Commission grant Minnesota Power’s data-exemption requests, conditioned on the provision of the alternative data proposed in Minnesota Power’s exemption request.

Minnesota Power concurred with the Department’s recommendations and agreed to provide the required and substitute data recommended in the Department’s comments.

C. Commission Action

The Commission agrees with the parties that certain specified data are unnecessary to determine the need for the proposed Duluth Loop Reliability Project. Further, the Commission agrees with the parties that it is reasonable to require the proposed substitute data instead, because the substitute data will be more pertinent to determining the need for this particular project than certain data identified in the rules. The Commission concurs with the analysis set forth in the Department's comments and finds Minnesota Power's requested exemptions, as modified by the Department, reasonable. Accordingly, the Commission will grant the exemptions as modified by the Department's comments, conditioned on the submission of the proposed alternative data.

ORDER

1. The Commission approves Minnesota Power's proposed notice plan.
2. The Commission grants a variance to Minnesota Rule 7829.2550, subpart 6, and directs that the notices identified in the notice plan shall occur no more than 60 days and no less than 14 days prior to the filing of the certificate-of-need application.
3. Minnesota Power may publish a smaller-sized notice in a newspaper of statewide distribution to meet the requirement of Minn. R. 7829.2500, subp. 5.
4. The Commission approves the requested application-data exemptions with modifications as provided in the Department of Commerce's March 22, 2021 comments.
5. This order shall become effective immediately.

BY ORDER OF THE COMMISSION



Will Seuffert
Executive Secretary



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CERTIFICATE OF SERVICE

I, Chrishna Beard, hereby certify that I have this day, served a true and correct copy of the following document to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States mail at St. Paul, Minnesota.

**Minnesota Public Utilities Commission
ORDER APPROVING NOTICE PLAN AND GRANTING VARIANCES AND
EXEMPTIONS**

Docket Number **E-015/CN-21-140**

Dated this 17th day of May, 2021

/s/ Chrishna Beard

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Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-140_Official Service List 21-140

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