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April 9, 2008

Mr. Steven Kozey  
Corporate Counsel  
Midwest Independent Transmission System Operator, Inc.  
701 City Center Drive  
Carmel, Indiana 46032

RE: Application to the Minnesota Public Utilities Commission for Certificates of Need for  
Three 345 kV Transmission Line Projects with Associated System Connections  
PUC Docket No. ET2, E002/CN-06-1115  
OAH Docket No. 15-2500-19350-2

Dear Mr. Kozey:

As you know, one of the roles of the Minnesota Office of Energy Security (OES) is to ensure that the records of cases brought before the Minnesota Public Utilities Commission are developed as completely and as robustly as possible. It is with this goal in mind that OES writes today to request that the Midwest Independent Transmission System Operator (Midwest ISO) consider intervening as a formal party in the above-referenced certificate of need proceeding.

This proceeding, known as the "CAPX 2020 Project," is by far the largest (to date) single transmission facilities project that has been proposed to be constructed in the State of Minnesota or in the surrounding region. Applicants Great River Energy and Xcel Energy, together with other electric utility partners, propose comprehensive changes to the bulk transmission system in Minnesota that, if constructed, also will result in direct and significant impacts to the bulk transmission system of North Dakota, South Dakota and Wisconsin, as well as the remainder of the immediate region. Specifically, CAPX 2020 proposes construction of three 345 kV transmission lines criss-crossing nearly 600 miles in Minnesota with potential direct impacts on over 70,000 Minnesota land owners. A project of this size and complexity also is likely to have material effects on the bulk transmission system well beyond the borders of the four states just mentioned.

As such, OES views that the record in this proceeding will be based to a large extent on information and data that is directly impacted by, directly pertinent to or based on information and data gathered, compiled or generated by the Midwest ISO. Since this information is expected to comprise a material portion of this record, OES, along with other Parties, will be looking closely at this information and will be seeking expert explanations and information regarding this expected record evidence. These expectations have prompted us to make this request today to the Midwest ISO to consider intervening as a formal Party in this case for informational purposes and also to consider providing an Expert Witness to sponsor testimony

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providing further explanations during the course of this proceeding. To be clear, OES is not requesting that the Midwest ISO consider advocating for or against the project. The true value of the Midwest ISO's involvement, in OES' view, is to provide clear impartial background information, where needed, regarding electric transmission operations, markets and industry challenges as well as information directly pertinent to this case.

I think that you will agree that in its oversight and planning role as the independent transmission system operator of the bulk transmission system in the Midwest region, together with its considerable overall energy expertise, the Midwest ISO is uniquely positioned to assess or comment on electric transmission proposals such as this. The Administrative Law Judge has established an intervention deadline of April 15, 2008 for parties intending to offer witnesses at the evidentiary proceeding, and of June 27, 2008 as to persons seeking intervention for some other purpose.

For the reasons stated above, the OES respectfully urges the Midwest ISO to intervene as a party in the CAPX 2020 project. Thank you for your consideration, and please feel free to contact me with any questions you may have in this regard.

Sincerely,

/s/ MARYA M. WHITE

Manager, Energy Regulation and Planning  
and Energy Facilities Permitting

MMW/jl

c: Mr. Edward A. Garvey, Director, OES  
Ms. Julia Anderson, Counsel for OES  
Mr. Clair Moeller, Midwest ISO  
Mr. Keith Bealle, Counsel for Midwest ISO  
Mr. Christopher Sandberg, External Counsel for Midwest ISO



E002/CN-06-1115

OAH Docket No. 15-2500-19350-2

**OAH Service List as of March 10, 2008**

All Parties have agreed to E-File documents at:  
[www.edockets.state.mn.us](http://www.edockets.state.mn.us). Filing with edockets shall constitute service on the Public Utilities Commission, the Department of Commerce and the Office of Administrative Hearings.

As of this date, all parties have agreed to accept service by e-mail at the e-mail addresses listed below. However, where indicated, parties have requested that the e-mail be followed by mail or delivery of a hard copy.

In the event that a pleading or attachment cannot be filed and served electronically, it must be filed and served on each of the parties at the addresses listed.

Documents that contain trade secret or nonpublic data may be e-filed, but may not be copied or served electronically.

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\*If there is a trade-secret version and a public version of the same document, only hard copies of the trade-secret version must be provided.

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