

STATE OF MINNESOTA  
OFFICE OF ADMINISTRATIVE HEARINGS  
PUBLIC UTILITIES COMMISSION

In the Matter of the Application of ITC  
Midwest LLC for a Certificate of Need and  
Route Permit for the Minnesota-Iowa 345 kV  
Transmission Line Project in Jackson, Martin,  
and Faribault Counties

**AFFIDAVIT**

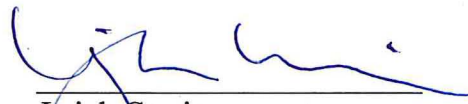
PUC Docket No. ET-6675/CN-12-1053  
OAH Docket No. 60-2500-30782

STATE OF MINNESOTA    )  
  )ss.  
COUNTY OF RAMSEY    )

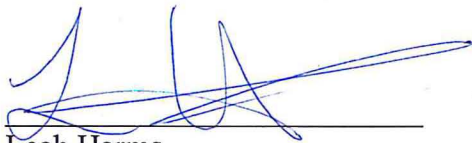
Leigh Currie, being duly sworn, states:

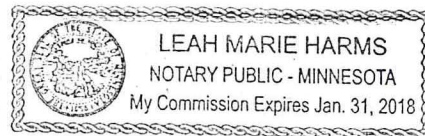
1. Attached herein is a true and correct copy of Information Requests (excluding attachments) that NoCapX 2020 served on Minnesota Center for Environmental Advocacy, Wind on the Wires, Izaak Walton League – Midwest Office, and Fresh Energy on May 1, 2008 in PUC Docket E002, ET2/CN-06-1115.

Further your affiant sayeth naught.

  
\_\_\_\_\_  
Leigh Currie

Subscribed and sworn to before me  
this 21<sup>st</sup> day of March, 2014

  
\_\_\_\_\_  
Leah Harms



**NoCapX 2020**  
**OVERLAND LAW OFFICE**  
**P.O. 176**  
**RED WING, MN 55066**

**(612) 227-8638**

**[WWW.LEGALECTRIC.ORG](http://WWW.LEGALECTRIC.ORG)**

**[OVERLAND@REDWING.NET](mailto:OVERLAND@REDWING.NET)**

**Information Request #1**

Docket Number: E002, ET2/CN-06-1115

Date of Request: May 1, 2008

Requested From: Beth Goodpaster or other knowledgeable party  
Minnesota Center for Environmental Advocacy

Beth Soholt or other knowledgeable party  
Wind on the Wires

Bill Grant or other knowledgeable party  
Izaak Walton League – Midwest

Michael Noble or other knowledgeable party  
Fresh Energy

Party Requesting Information: Carol A. Overland for NoCapX 2020

Type of Inquiry:  Financial       Rate of Return       Rate Design  
 Engineering       Forecasting       Conservation  
 Cost of Service       CIP       Other:

*If you feel your responses are trade secret or privileged, please indicate this on your response.*

Request No.	
1	For each of the above entities, please provide copies of grant application, contract/agreement, work plan and reports for the Wind on the Wires grants of May, 2001 (\$4.5 million); June, 2003 (\$8.1 million) and any other subsequent Wind on the Wires grants from the McKnight and Energy Foundations (see announcements attached) and subsequent WOW funding.
2	Please provide documentation of WOW grant-funded activities related to transmission in Minnesota, South Dakota, North Dakota, Iowa and Wisconsin, identifying dates, entity and its representative, activity, and copies of any handouts or presentations.

Response by: \_\_\_\_\_

List sources of information:

Title: \_\_\_\_\_

Department: \_\_\_\_\_

Telephone: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**NoCapX 2020**  
**OVERLAND LAW OFFICE**  
**P.O. 176**  
**RED WING, MN 55066**

Exhibit A-1  
Clean Energy Intervenors

**(612) 227-8638**

**[WWW.LEGALECTRIC.ORG](http://WWW.LEGALECTRIC.ORG)**

**[OVERLAND@REDWING.NET](mailto:OVERLAND@REDWING.NET)**

**Information Request #2**

Docket Number: E002, ET2/CN-06-1115

Date of Request: May 1, 2008

Requested From: Beth Goodpaster or other knowledgeable party  
Minnesota Center for Environmental Advocacy

Beth Soholt or other knowledgeable party  
Wind on the Wires

Bill Grant or other knowledgeable party  
Izaak Walton League – Midwest

Michael Noble or other knowledgeable party  
Fresh Energy

Party Requesting Information: Carol A. Overland for NoCapX 2020

Type of Inquiry:     Financial                     Rate of Return             Rate Design  
                           Engineering                     Forecasting                 Conservation  
                           Cost of Service                 CIP                             Other:

***If you feel your responses are trade secret or privileged, please indicate this on your response.***

Request No.	
1	For each of the above entities, please provide copies of any and all Comments and Draft Comments to DOE proposing a National Transmission Corridor within Minnesota, including but not limited to the "Heartland Transmission Corridor." Identify by name the funding source for this work and dollar amount.
2	Please provide documentation of basis for this statement, p. 7, of attached Congestion Study Comment:  <i>The CapX utilities are seeking approval for 3 new 345 kV transmission lines across Minnesota that will provide "backbone" infrastructure that stretches from the Dakotas, through Minnesota and into Wisconsin.</i>

Response by: \_\_\_\_\_

List sources of information:

Title: \_\_\_\_\_

Department: \_\_\_\_\_

Telephone: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**NoCapX 2020**  
**OVERLAND LAW OFFICE**  
**P.O. 176**  
**RED WING, MN 55066**

Exhibit A-1  
Clean Energy Intervenors

**(612) 227-8638**

**[WWW.LEGALECTRIC.ORG](http://WWW.LEGALECTRIC.ORG)**

**[OVERLAND@REDWING.NET](mailto:OVERLAND@REDWING.NET)**

**Information Request # 3-4**

Docket Number: E002, ET2/CN-06-1115 Date of Request: May 1, 2008

Requested From: Beth Goodpaster or other knowledgeable party  
Minnesota Center for Environmental Advocacy

Beth Soholt or other knowledgeable party  
Wind on the Wires

Bill Grant or other knowledgeable party  
Izaak Walton League – Midwest

Michael Noble or other knowledgeable party  
Fresh Energy

Party Requesting Information: Carol A. Overland for NoCapX 2020

Type of Inquiry:    ... Financial            ... Rate of Return            ... Rate Design  
                          ... Engineering            ... Forecasting            ... Conservation  
                          ... Cost of Service            ... CIP                    ... Other:

*If you feel your responses are trade secret or privileged, please indicate this on your response.*

Request No.	
3	For each of the above entities, please provide copies of any and all Comments and Draft Comments and maps to DOE proposing a National Transmission Corridor within Minnesota, including but not limited to the "Heartland Transmission Corridor." Identify by name the funding source for this work and dollar amount.
4	Please provide documentation of basis for this statement, p. 7, of attached Congestion Study Comment:  <i>The CapX utilities are seeking approval for 3 new 345 kV transmission lines across Minnesota that will provide "backbone" infrastructure that stretches from the Dakotas, through Minnesota and into Wisconsin.</i>

Response by: \_\_\_\_\_

List sources of information:

Title: \_\_\_\_\_

Department: \_\_\_\_\_

Telephone: \_\_\_\_\_

**NoCapX 2020  
OVERLAND LAW OFFICE  
P.O. 176  
RED WING, MN 55066**

Clean Energy Intervenors

**(612) 227-8638**

**[WWW.LEGALECTRIC.ORG](http://WWW.LEGALECTRIC.ORG)**

**[OVERLAND@REDWING.NET](mailto:OVERLAND@REDWING.NET)**

**Information Request # 5**

Docket Number: E002, ET2/CN-06-1115 Date of Request: May 1, 2008

Requested From: Beth Goodpaster or other knowledgeable party, MCEA

Beth Soholt or other knowledgeable party, Wind on the Wires

Bill Grant or other knowledgeable party, Izaak Walton League – Midwest

Michael Noble or other knowledgeable party, Fresh Energy

Party Requesting Information: Carol A. Overland for NoCapX 2020

Type of Inquiry:    ...Financial                    ...Rate of Return                    ...Rate Design  
                                  ...Engineering                    ...Forecasting                    ...Conservation  
                                  ...Cost of Service                    ...CIP                                    ...Other:

***If you feel your responses are trade secret or privileged, please indicate this on your response.***

Request No.	
5	<p>Please review attached March 6, 2006, Comments and map of AWEA, WOW, et al., to DOE proposing National Interest Electric Transmission Corridors.</p> <p>a. Describe in detail route proposed on map for proposed NIETC in North Dakota, South Dakota and Minnesota.</p> <p>b. Compare and distinguish between proposal of WOW, et al., and CapX 2020.</p> <p>c. What do the white squares on the blue line represent? If substations, identify the substations.</p> <p>d. Comments regarding Draft Criterion 2 and 3 address economic development and market considerations. For the Midwest corridor proposed, identify areas subject to economic development benefits and identify markets to be served.</p> <p>e. The Comment references MTEP 03 and MTEP 05. Provide copies of these transmission plans.</p>
6	<p>In addition to the DOE's NIETC docket, in what other venues has WOW, AWEA, et al. caused this or similar comment to be filed and/or promoted and/or presented regarding the transmission corridor? Provide full documentation.</p>

Response by: _____	List sources of information: _____
Title: _____	_____
Department: _____	_____
Telephone: _____	_____

**NoCapX 2020**  
**OVERLAND LAW OFFICE**  
**P.O. 176**  
**RED WING, MN 55066**

Clean Energy Intervenors

**(612) 227-8638**

[WWW.LEGALECTRIC.ORG](http://WWW.LEGALECTRIC.ORG)

[OVERLAND@REDWING.NET](mailto:OVERLAND@REDWING.NET)

**Information Request # 7-9**

Docket Number: E002, ET2/CN-06-1115 Date of Request: May 1, 2008

Requested From: Beth Goodpaster or other knowledgeable party, MCEA

Beth Soholt or other knowledgeable party, Wind on the Wires

Bill Grant or other knowledgeable party, Izaak Walton League – Midwest

Michael Noble or other knowledgeable party, Fresh Energy

Party Requesting Information: Carol A. Overland for NoCapX 2020

Type of Inquiry:    ... Financial                    ..... Rate of Return            ..... Rate Design  
                                  ..... Engineering                    ..... Forecasting                    ..... Conservation  
                                  ..... Cost of Service                    ..... CIP                                    .. Other:

***If you feel your responses are trade secret or privileged, please indicate this on your response.***

Request No.	
-------------	--

7. How many MW of coal generation of any type are currently in MISO queue in:
  - a. North Dakota
  - b. South Dakota
  - c. Minnesota
  - d. ND, SD and Minnesota combined
  
8. How many MW of wind generation are currently in MISO queue in Illinois?
  
9. Please review attached Wind On the Wires report “Net Environmental Impacts of Transmission Systems” and Power Point of same name.
  - a. Has WOW completed an NEITS analysis of CapX? Please provide a copy.
  - b. If no analysis has been completed for various scenarios of coal generation, using the number of MW in answer to 7(d) above, provide analysis using NEITS methodology described in WOW report for scenarios of 20%, 50%, 80% and 100% of proposed coal generation.

Response by: \_\_\_\_\_

List sources of information:

Title: \_\_\_\_\_

Department: \_\_\_\_\_

Telephone: \_\_\_\_\_

**NoCapX 2020**  
**OVERLAND LAW OFFICE**  
**P.O. 176**  
**RED WING, MN 55066**

Exhibit A-1  
Clean Energy Intervenors

**(612) 227-8638**

**[WWW.LEGALECTRIC.ORG](http://WWW.LEGALECTRIC.ORG)**

**[OVERLAND@REDWING.NET](mailto:OVERLAND@REDWING.NET)**

**Information Request # 10**

Docket Number: E002, ET2/CN-06-1115 Date of Request: May 1, 2008

Requested From: Beth Goodpaster or other knowledgeable party, MCEA

Beth Soholt or other knowledgeable party, Wind on the Wires

Bill Grant or other knowledgeable party, Izaak Walton League – Midwest

Michael Noble or other knowledgeable party, Fresh Energy

George Crocker, North American Water Office

Party Requesting Information: Carol A. Overland for NoCapX 2020

Type of Inquiry:    ... Financial                    ... Rate of Return                    ... Rate Design  
                          ... Engineering                    ... Forecasting                    ... Conservation  
                          ... Cost of Service                    ... CIP                                    ... Other:

***If you feel your responses are trade secret or privileged, please indicate this on your response.***

Request No.	
----------------	--

- 10 MCEA, the Izaak Walton League, Fresh Energy and NAWO negotiated with Xcel/NSP during the Southwest Minnesota 345kV proceeding, resulting in the TRANSLink agreement, attached. The “Merger Agreement” also had a provision related to transmission in Southwest Minnesota.
- a. Please provide copies of any and all agreements (complete agreement) and/or contracts regarding transmission with any and all of the applicants and/or predecessor or subsidiary corporations, including but not limited to, “TRANSLink agreement,” “Merger Agreement,” “Collector System.”
  - b. Provide copies of these and other agreements and contracts pertaining all or in part to transmission and generation related activities, such as intervention and participation in permitting, rate or rulemaking proceedings, lobbying for transmission or tariff legislation, transmission entities and transfer of assets, IGCC, coal, wind opposition & promotion, etc.
  - c. In light of agreements and contractual obligations above, describe interest and outcomes sought of each of the above parties in the CapX proceeding.
  - d. Identify any contractual boundaries to participation in the CapX docket.

Response by: \_\_\_\_\_

List sources of information: \_\_\_\_\_

Title: \_\_\_\_\_

Department: \_\_\_\_\_

Telephone: \_\_\_\_\_

