

OAH 80-2500-31888
MPUC Docket No. E-999/CI-14-643

STATE OF MINNESOTA
OFFICE OF ADMINISTRATIVE HEARINGS

FOR THE PUBLIC UTILITIES COMMISSION

In the Matter of the Further Investigation into
Environmental and Socioeconomic Costs
Under Minnesota Statute § 216B.2422,
Subdivision 3

**Great River Energy, Minnesota Power, and
Otter Tail Power Company Comments to
the CO₂ Issues List**

Pursuant to the Second Prehearing Order, Great River Energy, Minnesota Power, and Otter Tail Power Company (“GRE/MP/OTP”) submit the comments below regarding the Issues List filed on November 12, 2015. As was noted in the disclaimer statement for the list, the parties each prepared the summaries of their own witnesses’ testimony and did not, by jointly submitting the document, agree to the accuracy of those descriptions. Similarly, the parties agreed that when the summary of one witness’s testimony included references to another witness, the party whose witness was referenced was not responsible how the testimony of their witness was characterized. In preparing this list, GRE/MP/OTP have not endeavored to respond to every claim, argument, or characterization of a witness’s testimony with which they disagree; their silence in this document with respect to any particular item on the list should not be taken as agreement. Instead, GRE/MP/OTP have presented their substantive positions, including disagreements with how other parties have characterized Dr. Smith’s opinions, in other submissions. Likewise, given the agreement that each party would summarize its own witness’s testimony, when other parties’ witnesses made favorable admissions regarding Dr. Smith’s analysis or issues important to GRE/MP/OTP, those admissions are cited in the brief and proposed findings, not this document. Consequently, GRE/MP/OTP have limited these comments to the short list of clear typographical and organizational errors presented below.

Issue 10 - Modeling Horizon

Smith (p26): There was a typo in the fifth sentence of the section on page 26 summarizing Dr. Anne E. Smith's testimony, which read in part "... (damages from temperatures exceeding 43°C)..." This part of that fifth sentence should read as "... (damages from temperatures exceeding 3°C)..."

Issue 20 – Use of the Mean (Average of the SCC Values)

The reference in this section on page 50 to Dr. Bezdezk's opinion regarding the PAGE model should not be included in this section which is meant to summarize witnesses' opinions as to the averaging of the SCC values. A longer paragraph summarizing Dr. Bezdek's opinion with regard to PAGE was included in Issue 19, which is the appropriate section.

Issue 28 – Dr. Smith's Proposal

The additional citation on page 72 at the end of this section should read "See Sections II.C.7-10, II.E, above." The reference to Section II.D was a typo.

Dated: December 15, 2015

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