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May 8, 2014

**VIA EFILING**

Mr. Michael Rothman, Commissioner  
Minnesota Department of Commerce  
85 7<sup>th</sup> Place East, Ste. 500  
St. Paul, MN 55101-2198

John Linc Stine, Commissioner  
MN Pollution Control Agency  
520 Lafayette Road N.  
St. Paul, MN 55155-4194

Re: **Comments of the State of North Dakota in Response to State of Minnesota Department of Commerce and Pollution Control Agency's Potential Scenarios for Investigation of Externality Costs from Electric Generation Unit Emissions**  
**Docket No. E-999/CI-00-1636**

Dear Messrs. Rothman and Stine:

Enclosed for filing are the Comments of the State of North Dakota on the Potential Scenarios for Investigation of Externality Costs from Electric Generation Unit Emissions, in regard to the above-referenced docket.

We have served a copy to all parties on the service list. Please contact me at (701)328-3640 or by email at [maiolson@nd.gov](mailto:maiolson@nd.gov) if you have any questions regarding this filing.

Sincerely,

A handwritten signature in black ink that reads "Margaret I. Olson".

Margaret I. Olson  
Assistant Attorney General



# INDUSTRIAL COMMISSION OF NORTH DAKOTA

Jack Dalrymple  
Governor

Wayne Stenejem  
Attorney General

Doug Goehring  
Agriculture Commissioner

May 1, 2014

Mr. Michael Rothman, Commissioner  
Minnesota Department of Commerce  
85 7th Place East, Ste. 500  
St. Paul, MN 55101-2198

Mr. John Linc Stine, Commissioner  
Minnesota Pollution Control Agency  
520 Lafayette Road N.  
St. Paul, MN 55155-4194

**Re: In the Matter of the Investigation into Environmental and Socioeconomic  
Costs under Minn. Stat. § 216B.2422, Subd. 3.  
Docket No. E-999/CI-00-1636**

Dear Messrs. Rothman and Stine:

Thank you for this opportunity to comment on the scope of the Minnesota Public Utilities Commission's investigation into environmental and socioeconomic costs under Minn. Stat. § 216B.2422(3).

It is our understanding that the Commission is not considering including any issues affecting North Dakota facilities in the scope of this proceeding. North Dakota would strongly oppose any attempt to impose additional regulations on North Dakota facilities by, for example, extending the 200 mile boundary established by the Commission in its July 2, 1997 order or raising the values currently applied within the boundary.

Such extraterritorial regulation is, among other things, unconstitutional. In the context of the Next Generation Energy Act, Minn. Stat. § 216H.03, a federal judge recently held that Minnesota's attempt to regulate North Dakota facilities violates the dormant Commerce Clause. *North Dakota v. Heydinger*, 11-CV-3232, 2014 WL 1612331 (D. Minn. Apr. 18, 2014)

Should the potential scope of the proceeding be expanded to include any issues that may affect North Dakota facilities, North Dakota requests that it be given the opportunity to provide additional comment.

Sincerely,

North Dakota Industrial Commission

  
Jack Dalrymple  
Governor and Chairman

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Darrell	Gerber		Clean Water Action Alliance of Minnesota	308 Hennepin Ave. E. Minneapolis, MN 55414	Paper Service	No	OFF_SL_0-1636_1
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## CERTIFICATE OF SERVICE

Docket No. E-999/CI-00-1636

I hereby certify that on May 8, 2014, the following document: **COMMENTS OF THE STATE OF NORTH DAKOTA IN RESPONSE TO STATE OF MINNESOTA DEPARTMENT OF COMMERCE AND POLLUTION CONTROL AGENCY'S POTENTIAL SCENARIOS FOR INVESTIGATION OF EXTERNALITY COSTS FROM ELECTRIC GENERATION UNIT EMISSIONS** was filed electronically with the Minnesota Public Utilities Commission through its eFiling system, and that the eFiling system will provide service to those on the attached list who have selected electronic service.

I further certify that a copy of the forgoing document was served upon the other participants on the attached list with postage prepaid, in the United States mail at Bismarck, North Dakota this 8<sup>th</sup> day of May, 2014.

/s/ Margaret I. Olson  
Margaret I. Olson  
Assistant Attorney General  
Email: maiolson@nd.gov