June 29, 2012

Filed Electronically

Burl Haar, Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, MN 55101-2147

Re: Docket No. E-6471/GS-06-668

Dear Burl Haar,

The Sierra Club respectfully submits these comments on the Joint LEPGP Site Permit, HVTL Route Permit & Pipeline (Partial Exemption) Route Permit Application for the Mesaba Energy Project (E-6472/GS-06-668). The Sierra Club's mission is to explore, enjoy, and protect the wild places of the earth and educate and enlist humanity to protect and restore the quality of the natural and human environment. The Sierra Club has over 13500 members in Minnesota with direct and significant interests in the natural and human environment and electricity rates within the state. We appreciate the opportunity to participate in this process and thank you in advance for your consideration of our comments.

Excelsior Energy requests for the site and route permits previously adjudicated for a coal power plant over two years ago now be transferred to a new proposal for a natural gas plant. This is a significant request, and one in which the Commission should weigh the need, cost, and feasibility of the project. The Sierra Club believes that there is no reason to extend the two-year old permits to a new natural gas plant. As with the initial Mesaba Energy Project, Excelsior Energy has not produced evidence that there is need for this project. There simply is no reason to grandfather a brand new natural gas plant into a permit determination made for a coal plant over two years ago, especially where there is no determination of need for the project. Second, even if there was evidence of need for additional capacity, the Commission should not be forced to rubberstamp a fossil fuel project's siting permit without consideration of clean energy options such as renewable energy or energy efficiency to address capacity needs sustainably and cost-effectively.

In sum, it is not prudent to issue this permits without evidence of need and assessment of clean energy alternatives to the new Excelsior plant.

Sincerely,

Margaret Levin
State Director
Sierra Club North Star Chapter
http://northstar.sierraclub.org