



March 28, 2024

VIA E-FILING

Ms. Jenna Ness
Environmental Review Manager
Minnesota Department of Commerce
85 7th Place East, Suite 280
St. Paul, MN 55101-2198

Re: *In the Matter of the Application of Minnesota Power for a Certificate of Need and Route Permit for the HVDC Modernization Project in Hermantown, Saint Louis County*
OAH Docket No. 5-2500-39600; MPUC Docket Nos. E015/CN-22-607 and E015/TL-22-611
Comments on the Environmental Assessment

Dear Ms. Ness:

Minnesota Power (or the “Company”) appreciates the work of the Department of Commerce, Energy Environmental Review and Analysis (“EERA”) on the Environmental Assessment (“EA”) for the HVDC Modernization Project (“Project”). Minnesota Power provides the following limited comments on the EA regarding potential environmental and human impacts of the Project mitigation measures. The information contained herein was presented as part of pre-filed testimony, during the public hearing, or during the evidentiary hearing. This information is provided via letter to summarize this information for ease of review by EERA to facilitate its ability to respond to all comments on the EA by April 15, 2024, as contemplated by the Prehearing Order in this proceeding.

Visual Impacts

Overall, the EA states that both Minnesota Power's configuration of the Project and the configuration proposed by the American Transmission Company LLC, by and through its corporate manager, ATC Management Inc. (“ATC”) (the “ATC Arrowhead Alternative”) would pose negligible to minimal environmental impacts, but that Minnesota Power's configuration of the Project, when compared to the ATC Arrowhead Alternative, may present slightly greater impacts to aesthetics and cultural values. The EA reaches this conclusion based on the fact that the Project requires construction of a new St. Louis County 345 kV/230 kV Substation that will be located within 300 feet of Morris Thomas Road and will not be as well screened by the forested landscape as the existing Minnesota Power 230 kV/115 kV Arrowhead Substation or the ATC 345 kV/230 kV Arrowhead Substation.¹

¹ EA at 112.

The area between Morris Thomas Road and the proposed St. Louis County 345 kV/230 kV Substation is currently heavily wooded. To mitigate impacts to aesthetics and cultural values, Minnesota Power has committed to maintaining this existing vegetation buffer between the proposed St. Louis County 345 kV/230 kV Substation and the Morris Thomas Road.² By maintaining this existing vegetation, the potential visual impacts of the new St. Louis County Substation from Morris Thomas Road will be minimized.³

Neutral HVDC Converter Station Colors

The EA discusses that a potential way to mitigate aesthetic impacts to human settlement related to the construction of the HVDC Converter Station would be to select a color for the HVDC Converter Station that would better blend with the landscape.⁴ The Company commits to selecting a neutral color for the HVDC converter station that would naturally blend with the landscape as a way to mitigate potential aesthetic impacts to human settlement.

Double-Circuit Crossing Mitigation Measure

The EA notes that both Minnesota Power's proposed configuration for the Project and the ATC Arrowhead Alternative would involve an additional new crossing of the West Rocky Run Creek that would be cleared during construction.⁵ After further evaluation and consultation with the Minnesota Department of Natural Resources, Minnesota Power is proposing to double-circuit its 230 kV line between the proposed St. Louis County 345 kV/230 kV Substation and Minnesota Power's 230 kV/115 kV Arrowhead Substation to reduce the crossings of the West Rocky Run Creek from two to one for Minnesota Power's configuration of the HVDC Modernization Project.⁶ This proposed configuration was filed with my Direct Testimony at page 5 of Direct Schedule 1. A copy of that figure is included with this filing for ease of reference. While this double-circuit crossing would be constructed adjacent to the existing ± 250 kV HVDC transmission line right-of-way, once the double-circuit 230 kV transmission line is energized, the ± 250 kV HVDC transmission line right-of-way in the area of West Rocky Run Creek will be allowed to revegetate. While the EA depicted the proposed double-circuited 230 kV transmission line in Figure 10 of the EA on page 118, the EA did not discuss a double-circuit crossing for the 230 kV transmission line at West Rocky Run Creek as a potential mitigation measure. Minnesota Power is committing to double-circuit this crossing to further mitigate potential impacts associated with the Project.

Noise Mitigation

The EA discusses potential impacts to human settlement due to noise as a result of operating and constructing the Project.⁷ As mitigation measures to limit the impact of

² Ex. MP-129 at 3 (McCourtney Rebuttal).

³ Ex. MP-129 at 3 (McCourtney Rebuttal).

⁴ EA at 38-39 and at 114.

⁵ EA at 88-89.

⁶ See Ex. MP-129 at 4 (McCourtney Rebuttal); see also Ex. MP-120 at 11-12, Sch. 1 (McCourtney Direct).

⁷ EA at 42-48

noise on human settlement, the EA discusses how the draft route permit would limit construction and maintenance activities to daytime hours to the extent practicable.⁸ The EA also discusses how noise impacts could be reduced through use of certain technologies, such sound control devices (e.g. mufflers) and that vehicles should be used only when necessary.⁹ The EA states that transmission lines should be properly designed and constructed per industry standards and that all applicable noise regulations must be followed.¹⁰ The EA also confirms that further mitigation measures could be employed to mitigate noise impacts, such as using screens or berms or other natural buffers.¹¹

Recently, Minnesota Power completed a noise study to evaluate the anticipated noise that would be associated with Minnesota Power's configuration of the Project, without the implementation of noise mitigation measures.¹² This noise study concluded that the anticipated noise levels from new equipment associated with Minnesota Power's configuration of the Project would be below the noise standards set by the Minnesota Pollution Control Agency at the Project boundaries.¹³ A copy of this analysis was filed with my Rebuttal Testimony as Rebuttal Schedule 4. A copy of that analysis is attached to this correspondence for ease of reference.

Minnesota Power continues to evaluate other noise mitigation methods for the Project. In that vein, the Company commits to undertaking an additional noise study once final design of the Project is completed. Minnesota Power agrees to submit a compliance filing prior to commencing construction that would provide the revised noise study results associated with Minnesota Power's configuration of the Project.

If you have any questions regarding these comments, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel McCourtney", with a long, sweeping horizontal stroke extending to the right.

Daniel McCourtney
Manager – Strategic Environmental Initiatives

cc: Service Lists

⁸ EA at 47.

⁹ EA at 47.

¹⁰ EA at 48.

¹¹ EA at 47-48.

¹² Ex. MP-129 at 10, Sch. 4 (McCourtney Rebuttal).

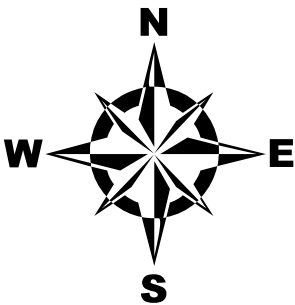
¹³ Ex. MP-129 at 10 (McCourtney Rebuttal).

Minnesota Power Route Alternative Analysis: MP HVDC Project

2/13/24

Legend

- MP 230 kV Alternative 9/13/23
- MP Application Preliminary 345 kV Alignment
- MP Application Preliminary 250 KV Alignment
- MP Application St. Louis County Sub
- MP Application HVDC Converter Yard



0.25

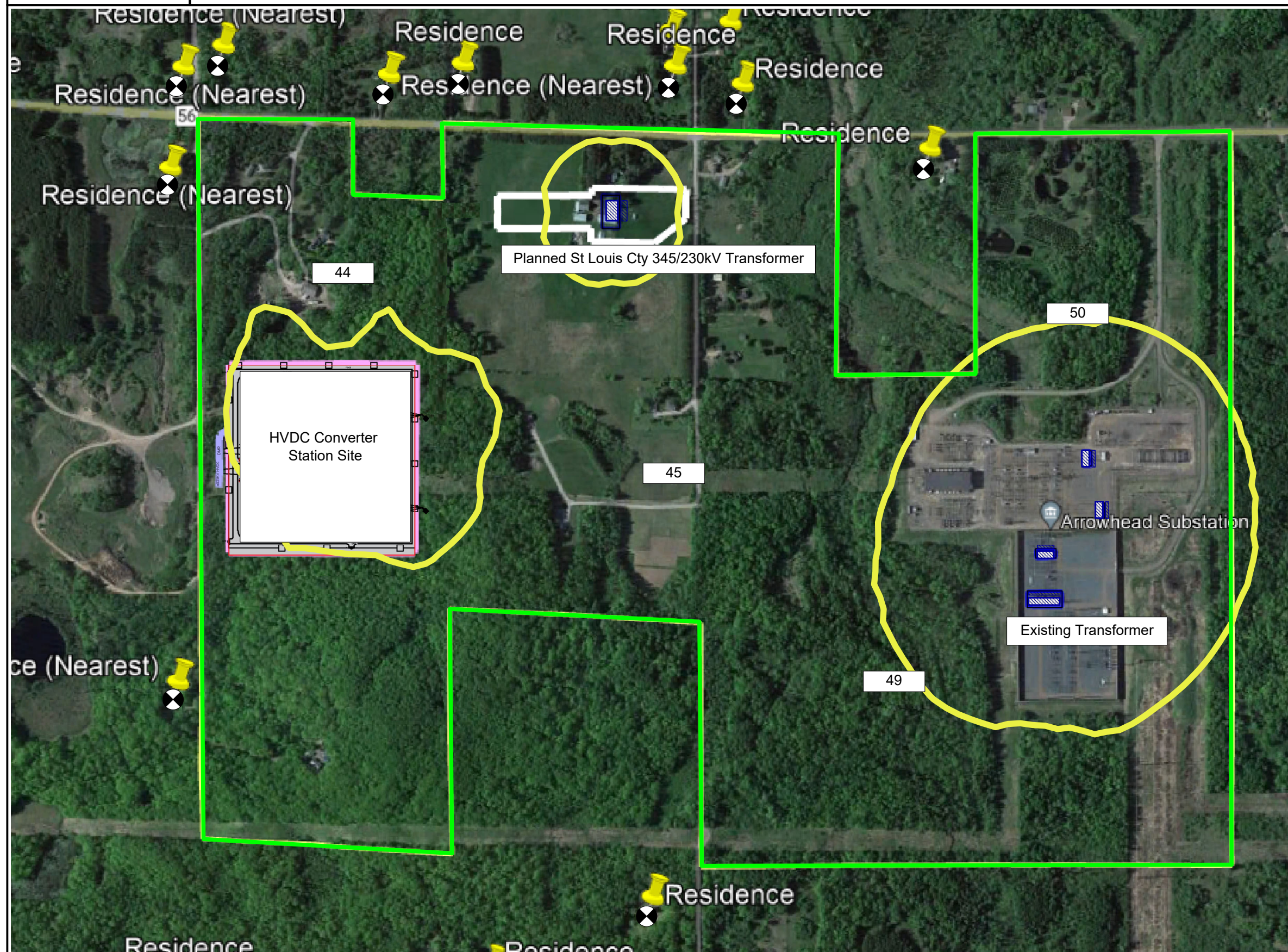
Miles



AN ALLETE COMPANY

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and E015/TL-22-611
MP Exhibit ____ (McCourtney)
Direct Schedule 1
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Minnesota Power HVDC Project, UM12 Converter Station
Monopole 900MW, stable operation fully energized



- + Point Source
- Area Source
- vert. Area Source
- Building
- Cylinder
- Barrier
- Ground Absorption
- Receiver
- Calculation Area

Noise Contour Map
50 dB(A), yellow line,
in 5ft (1,5m) height

For information only,
not binding for
execution

Siemens Energy Global GmbH & Co. KG
SE PE EN ID AS
Acoustics Erlangen
Schuckertstr. 3
91058 Erlangen, Germany

Date:
07.03.2024

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and E015/TL-22-611
MP Exhibit ____ (McCourtney)
Rebuttal Schedule 4
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IN THE MATTER OF THE APPLICATION OF
MINNESOTA POWER FOR A CERTIFICATE OF
NEED FOR THE HVDC MODERNIZATION
PROJECT IN HERMANTOWN, SAINT LOUIS
COUNTY

MPUC DOCKET No. E015/CN-22-607
OAH DOCKET No. 5-2500-39600

IN THE MATTER OF THE APPLICATION OF
MINNESOTA POWER FOR A ROUTE PERMIT FOR
THE HVDC MODERNIZATION PROJECT IN
HERMANTOWN, SAINT LOUIS COUNTY

MPUC DOCKET No. E015/TL-22-611
OAH DOCKET No. 5-2500-39600

CERTIFICATE OF SERVICE

Jill N. Yeaman certifies that on the 28th day of March, 2024, on behalf of Minnesota Power, she efiled a true and correct copy of **Minnesota Power's Comments on the Environmental Assessment** via [eDockets](#). Said document was also served via U.S. Mail or email as designated on the attached Service Lists on file with the Minnesota Public Utilities Commission in the above-referenced dockets.

/s/ Jill N. Yeaman

Jill N. Yeaman

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