



2200 IDS Center
80 South 8th Street
Minneapolis MN 55402-2157
tel 612.977.8400
fax 612.977.8650

December 30, 2016

Kodi Jean Verhalen
(612) 977-8591
kverhalen@briggs.com

ELECTRONIC FILING

Hon. Eric L. Lipman
Administrative Law Judge
State of Minnesota, Office of Administrative Hearings
PO Box 64620
St. Paul, MN 55164-0620

**Re: In the Matter of the Petition of Minnesota Energy Resources Corporation
for a Route Permit for the Rochester Natural Gas Pipeline Project in
Olmsted County
MPUC Docket No. G011/GP-15-858
OAH Docket No. 8-2500-33180**

Dear Judge Lipman:

Enclosed please find Minnesota Energy Resource Corporation's (the "Company") Reply to the Route Permit language proposed by the Department of Commerce, Energy Environmental Review and Analysis ("EERA") on December 23, 2016. As discussed by the Parties at the public and evidentiary hearing on November 9, 2016, EERA intended to, and did, propose, for the first time in its Initial Brief on December 23, 2016, Route Permit special conditions and revisions to the Generic Route Permit template. EERA and the Company agreed, and Your Honor concurred, that it would be appropriate to allow the Company to respond to this Route Permit language in a brief Reply due today.

In the enclosed filing, the Company has proposed revisions to the Route Permit language suggested by EERA. The Company provides its proposed revisions in redline format over a clean (revisions accepted) version of the table EERA used to present its proposed Route Permit language. Similar to the way EERA presented its proposed language, the Company has also provided a column that includes the rationale as to why the revisions were proposed. The majority of the revisions were proposed to either reflect the Modified Preferred Route recommended in both the Company's proposed Findings of Fact, Conclusions of Law, and Recommendations as well as the proposed revisions submitted by EERA or to clarify descriptions of the overall Rochester Natural Gas Pipeline Project. The enclosed filing only includes those portions of the Route Permit to which the Company has proposed revisions to EERA's language and does not include those portions to which the Company proposes no revisions.

B R I G G S A N D M O R G A N

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With this Reply, the Company has also included a revised version of the map included with its proposed Findings of Fact, Conclusions of Law, and Recommendations filed on December 2, 2016. The map enclosed with this Reply includes labels that identify the Township, Section, and Range, which were inadvertently omitted from the version filed on December 2, 2016.

Sincerely,

/s/ Kodi Jean Verhalen

Kodi Jean Verhalen

KJV/jy
Enclosures
cc: Service List

STATE OF MINNESOTA PUBLIC UTILITIES COMMISSION
PIPELINE ROUTING PERMIT
FOR CONSTRUCTION OF A LARGE NATURAL GAS PIPELINE
AND ASSOCIATED FACILITIES

IN
OLSMSTED COUNTY

ISSUED TO
MINNESOTA ENERGY RESOURCES CORPORATION

PUC DOCKET NO. G-011/GP-15-858

In accordance with the requirements of Minnesota Statutes Chapter 216G and Minnesota Rules Chapter 7852 this route permit is hereby issued to:

MINNESOTA ENERGY RESOURCES CORPORATION (MERC)

MERC is authorized by this route permit to construct: approximately 5.1 miles of 16-inch outside diameter and 8.08 miles of 12-inch outside diameter steel pipe with a maximum allowable operating pressure of 500 ~~designed to operate at pressures between 400-475~~ pounds per square inch gauge (psig), two town border stations (TBSs), one district regulator station (DRS) and other associated facilities.

The pipeline and associated facilities shall be built within the route identified in this permit and as portrayed on the aerial photos attached to this permit and in compliance with the conditions specified in this permit.

Approved and adopted this ____ day of March, 2017

BY ORDER OF THE COMMISSION

Daniel P. Wolf,
Executive Secretary

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~~FIGURES (Not attached)~~

~~**Figure 1:** [Map Illustrating Timing of Project Construction Phases](#)~~

~~**Figure 2:** [Aerial Photos of Commission Designated Route, TBS and DRS Sites](#)~~

ATTACHMENTS

Attachment 1: Complaint Procedures for Permitted Energy Facilities

Attachment 2: Compliance Filing Procedures for Permitted Energy Facilities

Attachment 3: Permit Compliance Filings

Attachment 4: [Aerial Photos of Commission-Approved Designated Route and Sites for Town Border Station 1D, the Proposed Town Border Station, and the Proposed District Regulator Station](#)

Attachment 5: [Agricultural Mitigation Plan Approved by the Minnesota Department of Agriculture](#)

Generic Route Permit Template Language	EERA Proposed Revisions	MERC Proposed Revisions Over EERA Revisions	MERC Rationale for Revision
<p>1.0 ROUTE PERMIT</p> <p>The Minnesota Public Utilities Commission (Commission) hereby issues this route permit to [Permittee Name] (Permittee) pursuant to Minnesota Statutes Chapter 216G and Minnesota Rules Chapter 7852. This permit authorizes [Permittee Name] to construct [Provide a brief description of the project as authorized by the Commission], and as identified in the attached route permit maps, hereby incorporated into this document.</p>	<p>1.0 ROUTE PERMIT</p> <p>The Minnesota Public Utilities Commission (Commission) hereby issues this <u>pipeline routing</u> permit to <u>Minnesota Energy Resources Corporation (herein after Permittee or MERC)</u> pursuant to Minnesota Statutes Chapter 216G and Minnesota Rules Chapter 7852. This permit authorizes <u>MERC</u> to construct: <u>approximately 5.1 miles of 16-inch outside diameter and 8.0 miles of 12-inch outside diameter steel pipe designed to operate at pressures between 400-475 pounds per square inch gauge (psig), two town border stations (TBS), one district regulator station (DRS), and other associated facilities.</u></p> <p><u>“Construction,” as defined in Minn R. 7852.0100 Subp. 11 “means any clearing of land, excavation, or other action for the purpose of constructing new pipeline that would adversely affect the natural environment of a pipeline route. Construction does not include...securing survey or geological data, including necessary borings to ascertain soil conditions.”</u></p> <p><u>“Associated facilities,” as defined in Minn R. 7852.0100 Subp. 7” means all parts of those physical facilities through which hazardous liquids or gas moves in transportation, including but not limited to pipe, valves, and other appurtenances</u></p>	<p>1.0 ROUTE PERMIT</p> <p>The Minnesota Public Utilities Commission (Commission) hereby issues this pipeline routing permit to Minnesota Energy Resources Corporation (herein after Permittee or MERC) pursuant to Minnesota Statutes Chapter 216G and Minnesota Rules Chapter 7852. This permit authorizes MERC to construct <u>a pipeline of approximately 14 miles in length</u>: approximately 5.1 miles of 16-inch outside diameter and 8.0<u>8</u> miles of 12-inch outside diameter steel pipe designed to <u>a maximum allowable operating pressure of 500</u> operate at pressures between 400-475 pounds per square inch gauge (psig), two town border stations (TBS), one district regulator station (DRS), and other associated facilities.</p> <p>“Construction,” as defined in Minn R. 7852.0100 Subp. 11 “means any clearing of land, excavation, or other action for the purpose of constructing new pipeline that would adversely affect the natural environment of a pipeline route. Construction does not include...securing survey or geological data, including necessary borings to ascertain soil conditions.”</p> <p>“Associated facilities,” as defined in Minn R. 7852.0100 Subp. 7” means all parts of those physical facilities through which hazardous liquids or gas moves in transportation, including but not limited to pipe, valves, and other appurtenances connected or attached to pipe, plumbing and compressor units, fabricated</p>	<p>Revisions to reflect the length of the Modified Preferred Route and the proper description of the pipeline.</p>

Generic Route Permit Template Language	EERA Proposed Revisions	MERC Proposed Revisions Over EERA Revisions	MERC Rationale for Revision
	<p><u>connected or attached to pipe, plumbing and compressor units, fabricated assemblies associated with pumping and compressor units, metering and delivery stations, regulations stations, holders, breakout tanks, fabricated assemblies, cathodic protection equipment, telemetering equipment, and communication instrumentation located on the right-of-way.”</u></p>	<p>assemblies associated with pumping and compressor units, metering and delivery stations, regulations stations, holders, breakout tanks, fabricated assemblies, cathodic protection equipment, telemetering equipment, and communication instrumentation located on the right-of-way.”</p>	
<p>2.0 PROJECT DESCRIPTION</p>	<p>2.0 PROJECT DESCRIPTION</p>	<p>2.0 PROJECT DESCRIPTION</p>	
<p><i>[Provide a description of the project as authorized by the Commission]</i></p> <p>2.1 Associated Facilities</p> <p><i>[Provide a detailed description of the associated facilities authorized by the Commission]</i></p>	<p><u>The Rochester Natural Gas Pipeline Project is comprised of approximately 5.1 miles of 16-inch outside diameter and 8.0 miles of 12-inch outside diameter steel pipe designed to operate at pressures between 400-475 pounds per square inch gauge (psig).</u></p> <p>2.1 Associated Facilities</p> <p><u>Consist of two town border stations (TBS) and one district regulator station (DRS). A TBS serves as the custody transfer point of natural gas carried by transmission pipelines (usually from an “interstate transmission operator” to an “intrastate distributor operator” (public utility). A TBS is also the point where the high pressure transmission gas (900 to 1,000 or more psig) is regulated down to the level of high pressure distribution gas (400 to 500 psig). The TBSs will include installation of pressure regulation and flow control valves, a</u></p>	<p>The Rochester Natural Gas Pipeline Project is comprised of approximately 5.1 miles of 16-inch outside diameter <u>steel pipe anticipated to be operated at 400 to 475 psig</u> and 8.08 miles of 12-inch outside diameter steel pipe designed anticipated to be operated at <u>250 to 275 pressures between 400-475 pounds per square inch gauge (psig). The maximum allowable pressure of the Project’s pipeline will be 500 psig.</u></p> <p>2.1 Associated Facilities</p> <p>Consist of two town border stations (TBSs) and one district regulator station (DRS). A TBS serves as the custody transfer point of natural gas carried by transmission pipelines (usually from an “interstate transmission operator” to an “intrastate distributor operator” (public utility). A TBS is also the point where the high pressure transmission gas (900 to 1,000 or more psig) is regulated down to the level of high pressure distribution gas (400 to 500 psig). The TBSs</p>	<p>Revisions to reflect the proposed design and operation of the pipeline to be installed for the Project (Finding 45). Also, “psig” was defined in Section 1.0 of the Permit language.</p> <p>“TBS” and “DRS” were already defined in Section 1.0 of the Permit. This information is unnecessary for inclusion in the Route Permit. If so included, high pressure distribution gas covers a</p>

Generic Route Permit Template Language	EERA Proposed Revisions	MERC Proposed Revisions Over EERA Revisions	MERC Rationale for Revision
	<p><u>line heater, odorization, and supervisory control and data acquisition (SCADA) station and metering.</u></p> <p><u>The district regulator station (DRS) will regulate high pressure distribution gas (400 to 500 psig) down to standard distribution pressure (60 to 100 psig) for delivery to a low pressure distribution system that directly serves customers. The DRS will include pressure regulation and flow control valves, a line heater and SCADA.</u></p> <p><u>Other associated facilities include required signage indicating the presence of a natural gas pipeline as required by 49 CFR 192.707 and applicable corrosion control requirements, such cathodic protection required by 49 CFR 192.463.</u></p>	<p>will include installation of pressure regulation and flow control valves, a line heater, odorization, and supervisory control and data acquisition (SCADA) station and metering.</p> <p>The district regulator station (DRS) will regulate high pressure distribution gas (400 to 500 psig) down to standard distribution pressure (60 to 100 psig) for delivery to a low pressure distribution system that directly serves customers. The DRS will include pressure regulation and flow control valves, a line heater and SCADA.</p> <p>Other associated facilities include required signage indicating the presence of a natural gas pipeline as required by 49 CFR 192.707 and applicable corrosion control requirements, such cathodic protection required by 49 CFR 192.463.</p>	<p>range of 200 psig to 500 psig.</p> <p>This information is unnecessary for inclusion in the Route Permit and was explained in the Comparative Environmental Analysis.</p>
	<p><u>2.2 Timing of Project Construction</u></p> <p><u>The Rochester Natural Gas Pipeline Project will be constructed in three distinct phases, as described below and illustrated on Figure XX, attached to this permit.</u></p> <ul style="list-style-type: none"> <u>Phase I of the project includes construction of a new MERC TBS 1D in the same area as the existing Northern Natural Gas TBS</u> 	<p>2.2 Timing of Project Construction</p> <p>The Rochester Natural Gas Pipeline Project will be constructed in three distinct phases, as described below and illustrated on Figure XX, attached to this permit.</p> <ul style="list-style-type: none"> Phase I of the project includes construction of a new MERC TBS 1D in the same area as the existing Northern Natural Gas TBS 1D located in the northwest quarter of section 30 in Cascade 	<p>The currently-planned phases do not need to be denoted on the Route Permit maps.</p>

Generic Route Permit Template Language	EERA Proposed Revisions	MERC Proposed Revisions Over EERA Revisions	MERC Rationale for Revision
	<p><u>1D located in the northwest quarter of section 30 in Cascade Township. Construction of Phase 1 is scheduled for completion in 2017.</u></p> <ul style="list-style-type: none"> Phase 2 of the project includes the installation of <u>5.1 miles of 16-inch outside diameter steel pipe. This phase of the project will connect the new MERC TBS 1D with the new proposed TBS. The expected in-service date for completion of Phase 2 is 2019.</u> <p><u>Phase 3 of the project includes installation of approximately 8.0 miles of 12-inch pipe outside diameter from the new TBS to the new district regulator station (DRS). This phase also includes construction of the new DRS, with an expected in-service date of 2022. After completion of Phase 3, NNG will remove the existing Rochester 1BTBS.</u></p>	<p>Township. Construction of Phase 1 is scheduled for completion in 2017.</p> <ul style="list-style-type: none"> Phase 2 of the project includes the <u>construction of the new proposed TBS and</u> installation of 5.1 miles of 16-inch outside diameter steel pipe. This phase of the project will connect<u>from</u> the new MERC TBS 1D with to the new proposed TBS. The expected in-service date for completion of Phase 2 is 2019. Phase 3 of the project includes installation of approximately 8.0 miles of 12-inch pipe outside diameter from the new TBS to the new district regulator station (DRS). This phase also includes construction of the new DRS, with an expected in-service date of 2022. After completion of Phase 3, NNG will remove the existing Rochester 1BTBS. 	<p>Revision to include planned construction of the new proposed TBS. Revisions to simplify description and avoid unnecessary duplication.</p> <p>Revisions to simplify description and avoid unnecessary duplication.</p> <p>Revision as NNG is not a Permittee under this Permit.</p>

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<p>2.2 Project Location</p> <p><i>[Describe the location of the project including details such as the county, state, city, and townships, as appropriate]</i></p>	<p>2.25 Project Location</p> <p><i>Language to be added later</i></p>	<p>2.5 Project Location</p> <p>Language to be added later <u>The Project will be located in the Townships of Cascade, Kalmar, Salem, Marion, and Rochester as well as the City of Rochester, in Olmsted County, Minnesota as shown on Attachment 4.</u></p>	<p>Revisions to reflect the Modified Preferred Route.</p>																				
<table border="1"> <thead> <tr> <th>County</th> <th>Township Name</th> <th>Township</th> <th>Range</th> <th>Section</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	County	Township Name	Township	Range	Section							<table border="1"> <thead> <tr> <th>County</th> <th>Township Name</th> <th>Township</th> <th>Range</th> <th>Section</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	County	Township Name	Township	Range	Section						<p>This information is available on the maps associated with the Route Permit.</p>
County	Township Name	Township	Range	Section																			
County	Township Name	Township	Range	Section																			
<p>3.0 DESIGNATED ROUTE</p> <p>The route designated by the Commission in this permit is the route described below and shown on the route maps attached to this permit. The route is generally described as follows:</p> <p><i>[Provide detailed description of the authorized route including the route widths and any other specifics relevant to each segment. Also include a reference to the relevant route map to be attached to the permit.]</i></p>	<p>3.0 DESIGNATED ROUTE</p> <p>The route designated by the Commission in this permit is the route described below and <u>as shown on the route maps aerial photos</u> attached to this permit (See <u>Appendix</u>). The route is generally described as follows:</p> <p><i>[Provide detailed description of the authorized route including the route widths and any other specifics relevant to each segment. Also include a reference to the relevant route map to be attached to the permit.]</i></p>	<p>3.0 DESIGNATED ROUTE</p> <p>The route designated by the Commission in this permit is the route described below and as shown on the aerial photos attached to this permit (See <u>Appendix — Attachment 4</u>). The route is generally described as follows:</p> <p><i>[Provide detailed description of the authorized route including the route widths and any other specifics relevant to each segment. Also include a reference to the relevant route map to be attached to the permit.]</i> <u>The designated route exits TBS 1D and follows 19th Street NW west for about 1.1 miles and then 70th Avenue NW south for approximately 0.4 miles then follows an electric distribution line for approximately 1.0 mile and then rejoins 70th Ave SW for another 2.5 miles to County State Aid Highway (CSAH) CSAH 25 near the new proposed TBS. The route turns east and continues along CSAH 25 for about 0.5 mile, south along CSAH 15 for nearly 0.2 mile, proceeds southeast cross country for about 0.5</u></p>	<p>Revisions to reflect the Modified Preferred Route and to include the appropriate cross-reference.</p>																				

Generic Route Permit Template Language	EERA Proposed Revisions	MERC Proposed Revisions Over EERA Revisions	MERC Rationale for Revision
		<p><u>mile to 60th Avenue SW, and then continues south for roughly 1.3 mile along 60th Avenue SW to 40th Street SW, and then follows 40th Street SW east for about 2.0 miles to County Road 8 and south along County Road 8 for approximately 0.5 mile. The route then proceeds east cross country for about 2.0 miles on the half section line along field breaks and property lines to 11th Avenue SW. The route continues north along 11th Avenue SW for approximately 0.5 mile and then east along 40th Street SW for nearly 1.3 miles, crossing US Highway 63 in the 40th Street SW interchange before terminating at the proposed DRS.</u></p> <p><u>The designated route has a width of 500 feet, except for a short portion along 60th Avenue SW, in Section 19 of Rochester Township and Section 24 of Salem Township, which has a route width of 700 feet as shown on the route map included at Attachment 4.</u></p>	
<p>The identified route widths will provide the Permittee with flexibility for minor adjustments of the specific alignment or right-of-way to accommodate landowner requests and unforeseen conditions. The final alignment (i.e., permanent and maintained rights-of-way) will be located within this designated route unless otherwise authorized by the Commission.</p>	<p>The identified route widths <u>on the attached aerial photos</u> will provide the Permittee with flexibility for minor adjustments of the specific alignment or right-of-way to accommodate landowner requests and unforeseen conditions. The final alignment (i.e., permanent and maintained rights-of-way <u>and temporary workspace</u>) will be located within this designated route unless otherwise authorized by the Commission.</p>	<p>The identified route widths on the attached aerial photos will provide the Permittee with flexibility for minor adjustments of the specific alignment or right-of-way to accommodate landowner requests and unforeseen conditions. The final alignment (i.e., permanent and maintained rights-of-way and temporary workspace) will be located within this designated route unless otherwise authorized by the Commission.</p> <p>The Permittee has identified a proposed alignment within the designated route that</p>	

Generic Route Permit Template Language	EERA Proposed Revisions	MERC Proposed Revisions Over EERA Revisions	MERC Rationale for Revision
	<p><u>The Permittee has identified a proposed alignment within the designated route that minimizes potential impacts to the criteria identified in Minn. R. 7852.1900, and as such this permit anticipates that the actual right-of-way will generally conform to this proposed alignment, except as otherwise provided by this permit. Any alignment modification within this designate route shall be located to have the same or less impacts relative to the criteria in Minn. R. 7852.1900 as this alignment identified in this permit.</u></p> <p><u>Route width variations may be allowed for the Permittee to overcome potential site specific constraints. These constraints may arise from any of the following:</u></p> <ol style="list-style-type: none"> <u>1. Unforeseen circumstances encountered during the detailed engineering and design process.</u> <u>2. Federal or state agency requirements.</u> <u>3. Existing infrastructure within the pipeline route, including but not limited to railroads, natural gas and liquid pipelines, high voltage electric transmission lines, or sewer and water lines.</u> <p><u>Any alignment modifications</u></p>	<p>minimizes potential impacts to the criteria identified in Minn. R. 7852.1900, and as such this permit anticipates that the actual right-of-way will generally conform to this proposed alignment, except as otherwise provided by this permit. Any alignment modification within this designate route shall be located to have the same or less impacts relative to the criteria in Minn. R. 7852.1900 as this alignment identified in this permit.</p> <p>Route width variations may be allowed for the Permittee to overcome potential site specific constraints. These constraints may arise from any of the following:</p> <ol style="list-style-type: none"> 1. Unforeseen circumstances encountered during the detailed engineering and design process, <u>including a landowner request for a different location entirely on that landowner’s property so long as the Permittee is agreeable to the proposed location.</u> 2. Federal or state agency requirements. 3. Existing infrastructure within the pipeline route, including but not limited to railroads, natural gas and liquid pipelines, high voltage electric transmission lines, or sewer and water lines. <p>Any alignment modifications arising from these site specific constraints that would result in right-of-way placement outside of this designated route</p>	<p>Proposed revision consistent with the Company’s request in its Proposed Findings of Fact to ensure the Company can be responsive to landowner requests (Finding 204 and n.246).</p> <p>Revision to reflect cross-referenced location in Route</p>

Generic Route Permit Template Language	EERA Proposed Revisions	MERC Proposed Revisions Over EERA Revisions	MERC Rationale for Revision
	<p><u>arising from these site specific constraints that would result in right-of-way placement outside of this designated route shall be located to have the same or less impacts relative to the criteria in Minn. R. 7852.1900 as the alignment identified in this permit and be specifically identified in and approved as part of the Plan and Profile submitted pursuant to Condition XX of this permit.</u></p>	<p>shall be located to have the same or less impacts relative to the criteria in Minn. R. 7852.1900 as the alignment identified in this permit and be specifically identified in and approved as part of the Plan and Profile submitted pursuant to Condition XX <u>Section 10.1</u> of this permit.</p>	<p>Permit.</p>
<p>5.1 Agricultural Protection Plan [if applicable]</p> <p>The Permittee shall comply with the Agricultural Protection Plan (APP) that is attached to this permit (<i>Appendix XX</i>) and incorporated herein. The obligation to comply with the APP as a condition of this permit shall expire with the termination of Commission jurisdiction over this permit as prescribed by Minn. R. 7852.3900, unless otherwise specified in the APP. The Minnesota Department of Agriculture must approve of any amendments to the APP. The Permittee shall file the amended APP with the Commission within 10 days of Minnesota Department of Agriculture approval.</p>	<p>5.1 Agricultural Protection Plan [if applicable]</p> <p>The Permittee shall comply with the Agricultural Protection Plan (APP) that is attached to this permit (<i>Appendix XX</i>) and incorporated herein. The obligation to comply with the APP as a condition of this permit shall expire with the termination of Commission jurisdiction over this permit as prescribed by Minn. R. 7852.3900, unless otherwise specified in the APP. The Minnesota Department of Agriculture must approve of any amendments to the APP. The Permittee shall file the an amended APP with the Commission within 10 days of Minnesota Department of Agriculture approval.</p>	<p>5.1 Agricultural Protection Mitigation Plan</p> <p>The Permittee shall comply with the Agricultural Protection Mitigation Plan (AMPP) attached to this permit (Appendix XX <u>Attachment 5</u>) and incorporated herein. The obligation to comply with the AMPP as a condition of this permit shall expire with the termination of Commission jurisdiction over this permit as prescribed by Minn. R. 7852.3900, unless otherwise specified in the AMPP. The Minnesota Department of Agriculture must approve of any amendments to the AMPP. The Permittee shall file an amended AMPP with the Commission within 10 days of Minnesota Department of Agriculture approval.</p>	<p>Revision to refer to plan as it has been in the Application and the Comparative Environmental Analysis. Revision to include cross-references to appropriate attachment.</p>
<p>5.5 Construction Practices</p> <p>The Permittee shall follow those specific construction practices and material specifications described in [<i>Permittee Name</i>] Application to the Commission for</p>	<p>5.5 Construction Practices</p> <p>The Permittee shall follow those specific construction practices and material specifications described in [<i>Permittee Name</i>] <u>Minnesota</u></p>	<p>5.3 Construction Practices</p> <p>The Permittee shall follow those specific construction practices and material specifications described in Minnesota Energy Resources</p>	<p>Revision for consistency in referring to the Company.</p>

Generic Route Permit Template Language	EERA Proposed Revisions	MERC Proposed Revisions Over EERA Revisions	MERC Rationale for Revision
<p>a route permit for the <i>[Project Application Name and Environmental Information Report]</i>, dated <i>[Date]</i>, and the record of the proceedings unless this permit establishes a different requirement in which case this permit shall prevail. The Permittee shall comply with the conditions for right-of-way preparation, construction, cleanup, and restoration contained in Minn. R. 7852.3600.</p>	<p><u>Energy Resources Corporation</u> Application to the Commission for a route permit for the <i>[Project Application Name and Environmental Information Report]</i> <u>Rochester Natural Gas Pipeline Project</u>, dated <u><i>[Date]</i> November 3, 2015</u>, and the record of the proceedings unless this permit establishes a different requirement in which case this permit shall prevail. The Permittee shall comply with the conditions for right-of-way preparation, construction, cleanup, and restoration contained in Minn. R. 7852.3600.</p>	<p>Corporation<u>MERC's</u> Application to the Commission for a route permit for the Rochester Natural Gas Pipeline Project, dated November 3, 2015, and the record of the proceedings unless this permit establishes a different requirement in which case this permit shall prevail. The Permittee shall comply with the conditions for right-of-way preparation, construction, cleanup, and restoration contained in Minn. R. 7852.3600.</p>	
<p>5.5.7 Site Sediment and Erosion Control</p> <p>The Permittee shall implement those erosion prevention and sediment control practices recommended by the Minnesota Pollution Control Agency Construction Stormwater Program.</p> <p>The Permittee shall minimize erosion and sedimentation during construction and shall employ perimeter sediment controls, seeding, using erosion control blankets and turf reinforcement mats, stabilizing slopes, protecting storm drain inlets, protecting soil stockpiles, and controlling vehicle tracking. Contours shall be graded as required so that all surfaces provide for proper drainage, blend with the natural terrain, and are left in a condition that will facilitate re-vegetation and prevent erosion. All areas disturbed during</p>	<p>5.5.7 4 Site Sediment and Erosion Control</p> <p>The Permittee shall implement those erosion prevention and sediment control practices recommended by the Minnesota Pollution Control Agency Construction Stormwater Program.</p> <p>The Permittee shall minimize erosion and sedimentation during construction and shall employ perimeter sediment controls, protect exposed soil by promptly planting, seeding, using erosion control blankets and turf reinforcement mats, stabilizing slopes, protecting storm drain inlets, protecting soil stockpiles, and controlling vehicle tracking. Contours shall be graded as required so that all surfaces provide for proper drainage, blend</p>	<p>5.5.4 Site Sediment and Erosion Control</p> <p>The Permittee shall develop a Soil Erosion and Sediment Control Plan prior to construction and submit the Plan to the Commission at least fourteen (14) days prior to the start of construction. This Plan may be the same as the Storm Water Pollution Prevention Plan (SWPPP) submitted to the MPCA as part of the National Pollutant Discharge Elimination System (NPDES) permit application provided it identifies the information in the following paragraph.</p> <p>The Soil Erosion and Sediment Control Plan shall address what types of erosion control measures will be implemented during each Project phase and shall at a minimum identify: plans for grading, construction, and restoration of the areas</p>	<p>Revision as “SWPPP” is a previously-identified term.</p> <p>Revision to correct typographical error.</p> <p>The Company has not proposed a revision to the Section numbering, but notes that based on EERA’s revision to</p>

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<p>construction of the facilities shall be returned to pre-construction conditions.</p> <p>In accordance with Minnesota Pollution Control Agency requirements, the Permittee shall obtain a National Pollutant Discharge Elimination System (NPDES)/State Disposal System (SDS) Construction Stormwater permit from the Minnesota Pollution Control Agency.</p>	<p>with the natural terrain, and are left in a condition that will facilitate revegetation and prevent erosion. All areas disturbed during construction of the facilities shall be returned to pre-construction conditions.</p> <p>In accordance with Minnesota Pollution Control Agency requirements, the Permittee shall obtain a National Pollutant Discharge Elimination System (NPDES)/State Disposal System (SDS) Construction Stormwater permit from the Minnesota Pollution Control Agency.</p> <p><u>The Permittee shall develop a Soil Erosion and Sediment Control Plan prior to construction and submit the Plan to the Commission at least fourteen (14) days prior to the start of construction. This Plan may be the same as the Storm Water Pollution Prevention Plan (SWPP) submitted to the MPCA as part of the National Pollutant Discharge Elimination System (NDPES) permit application provided it identifies the information in the following paragraph.</u></p> <p><u>The Soil Erosion and Sediment Control Plan shall address what types of erosion control measures will be implemented during each Project phase and shall at a minimum identify: plans for grading, construction, and</u></p>	<p>affected by construction activities; necessary soil information; detailed design features to maintain downstream water quality; a comprehensive revegetation plan to maintain and ensure adequate erosion control and slope stability and to restore the site after temporary activities; and measures to minimize the area of surface disturbance. Other practices shall include containing excavated material, protecting exposed soil, and stabilizing restored material and removal of silt fences or barriers when the area is stabilized. The plan shall identify methods for disposal or storage of excavated material. Erosion and sedimentation control measures shall be implemented prior to construction and maintained until restoration activities are completed for each phase of the Project.</p>	<p>renumber “Construction Practices” as “Section 5.3,” those sections currently numbered “5.5.,” should be renumbered “5.3.,” and “Section 5.6” should be renumbered “Section 5.4.”</p>

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	<p><u>restoration of the areas affected by construction activities; necessary soil information; detailed design features to maintain downstream water quality; a comprehensive re-vegetation plan to maintain and ensure adequate erosion control and slope stability and to restore the site after temporary activities; and measures to minimize the area of surface disturbance. Other practices shall include containing excavated material, protecting exposed soil, and stabilizing restored material and removal of silt fences or barriers when the area is stabilized. The plan shall identify methods for disposal or storage of excavated material. Erosion and sedimentation control measures shall be implemented prior to construction and maintained until restoration activities are completed for each phase of the Project.</u></p>		
<p>5.5.9 Soil Compaction</p> <p>Compaction of agricultural lands by the Permittee must be kept to a minimum and mitigated in accordance with its agricultural protection plan <i>[if applicable]</i>.</p>	<p>5.5.9 6 Soil Compaction</p> <p>Compaction of agricultural lands by the Permittee must be kept to a minimum and mitigated in accordance with its agricultural protection plan. [if applicable] See Appendix XX.</p>	<p>5.5.6 Soil Compaction</p> <p>Compaction of agricultural lands by the Permittee must be kept to a minimum and mitigated in accordance with its agricultural protection plan. [if applicable] AMP (See Attachment 5) See Appendix XX.</p>	<p>Revision to refer to the plan with consistent naming from the Comparative Environmental Analysis.</p>
<p>5.5.12 Wetlands and Water Resources</p> <p>Wetlands and riparian areas shall be accessed using the shortest route possible in order to minimize travel through wetland areas and prevent unnecessary</p>	<p>5.5.129 Wetlands and Water Resources</p> <p>Wetlands and riparian areas shall be accessed using the shortest route possible in order to minimize travel</p>	<p>5.5.9 Wetlands and Water Resources</p> <p>Wetlands and riparian areas shall be accessed using the shortest route possible in order to minimize travel through wetland areas and</p>	

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<p>impacts. No temporary workspace areas shall be placed within or adjacent to wetlands or water resources, as practicable. To minimize impacts, construction in wetland areas shall occur during frozen ground conditions where practicable and shall be according to permit requirements by the applicable permitting authority. When construction during winter is not possible, wooden or composite mats shall be used to protect wetland vegetation. Soil excavated from the wetlands and riparian areas shall be contained and not placed back into the wetland or riparian area.</p> <p>Dewatering during periods of excessive precipitation or in areas where the natural groundwater table intersects the pipeline trench will not be directed into wetlands or water bodies. Dewatering discharges will be directed toward well vegetated upland areas. Should discharge activities need to be directed off the right-of-way landowner consent will be obtained and locations will be chosen to minimize impacts. All discharge activities will comply with applicable agency permits or approvals.</p> <p>Areas disturbed by construction activities shall be restored to pre-construction conditions. Restoration of the wetlands will be performed by Permittee in accordance with the requirements of applicable state and federal permits or laws and landowner agreements.</p> <p>All requirements of the U.S. Army Corps</p>	<p>through wetland areas and prevent unnecessary impacts. No temporary workspace areas shall be placed within or adjacent to wetlands or water resources, as practicable. To minimize impacts, construction in wetland areas shall occur during frozen ground conditions where practicable and shall be according to permit requirements by the applicable permitting authority. When construction during winter is not possible, wooden or composite mats shall be used to protect wetland vegetation. Soil excavated from the wetlands and riparian areas shall be contained and not placed back into the wetland or riparian area.</p> <p>Dewatering during periods of excessive precipitation or in areas where the natural groundwater table intersects the pipeline trench will not be directed into wetlands or water bodies. Dewatering discharges will be directed toward well vegetated upland areas. Should discharge activities need to be directed off the right-of-way landowner consent will be obtained and locations will be chosen to minimize impacts. All discharge activities will comply with applicable agency permits or approvals.</p> <p>Areas disturbed by construction activities shall be restored to pre-</p>	<p>prevent unnecessary impacts. No temporary workspace areas shall be placed within or adjacent to wetlands or water resources, as practicable. To minimize impacts, construction in wetland areas shall occur during frozen ground conditions where practicable and shall be according to permit requirements by the applicable permitting authority. When construction during winter is not possible, wooden or composite mats shall be used to protect wetland vegetation. Soil excavated from the wetlands and riparian areas shall be handled in compliance with the permit from the appropriate regulatory agency. contained and not placed back into the wetland or riparian area.</p> <p>Dewatering during periods of excessive precipitation or in areas where the natural groundwater table intersects the pipeline trench will not be directed into wetlands or water bodies. Dewatering discharges will be directed toward well vegetated upland areas. Should discharge activities need to be directed off the right-of-way landowner consent will be obtained and locations will be chosen to minimize impacts. All discharge activities will comply with applicable agency permits or approvals.</p> <p>Areas disturbed by construction activities shall be restored to pre-construction conditions. Restoration of the wetlands will be performed by Permittee in accordance with the requirements of applicable state and federal permits or laws and</p>	<p>Revision to reflect regulatory oversight by the Minnesota Department of Natural Resources and/or the U.S. Army Corps of Engineers.</p>

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<p>of Engineers (wetlands under federal jurisdiction), Minnesota Department of Natural Resources (Public Waters/Wetlands), and County (wetlands under the jurisdiction of the Minnesota Wetland Conservation Act) shall be met.</p>	<p>construction conditions. Restoration of the wetlands will be performed by Permittee in accordance with the requirements of applicable state and federal permits or laws and landowner agreements.</p> <p>All requirements of the U.S. Army Corps of Engineers (wetlands under federal jurisdiction), Minnesota Department of Natural Resources (Public Waters/Wetlands), and County (wetlands under the jurisdiction of the Minnesota Wetland Conservation Act) shall be met.</p>	<p>landowner agreements.</p> <p>All requirements of the U.S. Army Corps of Engineers (wetlands under federal jurisdiction), Minnesota Department of Natural Resources (Public Waters/Wetlands), and County (wetlands under the jurisdiction of the Minnesota Wetland Conservation Act) shall be met.</p> <p><u>As part of the preconstruction reports, the Permittee will include a section evaluating the potential for the occurrence of aquatic invasive species in the project area and describing, if any, the best management practices that apply. The Permittee should identify any infested waters or otherwise indicate that aquatic invasive species are not anticipated. The DNR must be provided an opportunity to review and comment on the plan. The DNR must be notified if any aquatic invasive species are identified in an area not previously identified as infested water.</u></p>	<p>Moved from proposed special condition to this location as recommended by EERA.</p>
<p>5.5.18 Archaeological and Historic Resources</p> <p>The Permittee shall make every effort to avoid impacts to identified archaeological and historic resources when constructing the transmission facility. In the event that a resource is encountered, the Permittee shall contact and consult with the State Historic Preservation Office and the State Archaeologist. Where feasible, avoidance of the resource is required. Where not feasible, mitigation must include an effort to minimize project impacts on the</p>	<p>5.5.18 Archaeological and Historic Resources</p> <p>The Permittee shall make every effort to avoid impacts to identified archaeological and historic resources when constructing the transmission facility. In the event that a resource is encountered, the Permittee shall contact and consult with the State Historic Preservation Office and the State Archaeologist. Where feasible, avoidance of the resource is required. Where not</p>	<p>5.5.15 Archaeological and Historic Resources</p> <p>The Permittee shall work with the State Historic Preservation Office (SHPO) and the State Archaeologist prior to commencing construction to determine whether any additional archaeological survey work will be necessary for any part of the proposed Project. The Permittee shall contract with a qualified archaeologist to complete such surveys, and shall submit the results to SHPO, the State Archaeologist and the Commission.</p>	

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<p>resource consistent with State Historic Preservation Office and State Archaeologist requirements.</p> <p>Prior to construction, workers shall be trained about the need to avoid cultural properties, how to identify cultural properties, and procedures to follow if undocumented cultural properties, including gravesites, are found during construction. If human remains are encountered during construction, the Permittee shall immediately halt construction and promptly notify local law enforcement and the State Archaeologist. Construction at such location shall not proceed until authorized by local law enforcement or the State Archaeologist.</p>	<p>feasible, mitigation must include an effort to minimize project impacts on the resource consistent with State Historic Preservation Office and State Archaeologist requirements.</p> <p><u>The Permittee shall work with the State Historic Preservation Office (SHPO) and the State Archaeologist prior to commencing construction to determine whether any additional archaeological survey work will be necessary for any part of the proposed Project. The Permittee shall contract with a qualified archaeologist to complete such surveys, and shall submit the results to SHPO, the State Archaeologist and the Commission.</u></p> <p><u>The SHPO and the State Archaeologist will make recommendations for the treatment of any significant archaeological sites which are identified. Any issue in the implementation of these recommendations will be resolved by the Commission in consultation with SHPO and the State Archaeologist.</u></p> <p>Prior to construction, workers shall be trained about the need to avoid cultural properties, how to identify cultural properties, and procedures to follow if undocumented cultural properties, including gravesites, are found during construction. If human remains are encountered during</p>	<p>The SHPO and the State Archaeologist will make recommendations for the treatment of any significant archaeological sites which are identified. Any issue in the implementation of these recommendations will be resolved by the Commission in consultation with SHPO and the State Archaeologist.</p> <p>Prior to construction, workers shall be trained about the need to avoid cultural properties, how to identify cultural properties, and procedures to follow if undocumented cultural properties, including gravesites, are found during construction. If any previously unrecorded archaeological sites are found during construction, the Permittee shall mark and preserve the sites and promptly notify the SHPO, the State Archaeologist, and the Commission of such discovery. The Permittee shall not excavate at such locations until so authorized by the Commission in consultation with the SHPO and the State Archeologist.</p> <p>If human remains are encountered during construction, the Permittee shall immediately halt construction at that location and promptly notify local law enforcement authorities and the State Archaeologist. Construction at the human remains location shall not proceed until authorized by local law Enforcement authorities or the State Archaeologist.</p>	

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	<p>construction, the Permittee shall immediately halt construction and promptly notify local law enforcement and the State Archaeologist. Construction at such location shall not proceed until authorized by local law enforcement or the State Archaeologist. If any previously unrecorded archaeological sites are found during construction, the Permittee shall mark and preserve the sites and promptly notify the SHPO, the State Archaeologist, and the Commission of such discovery. The Permittee shall not excavate at such locations until so authorized by the Commission in consultation with the SHPO and the State Archeologist.</p> <p><u>If human remains are encountered during construction, the Permittee shall immediately halt construction at that location and promptly notify local law enforcement authorities and the State Archaeologist. Construction at the human remains location shall not proceed until authorized by local law Enforcement authorities or the State Archaeologist.</u></p> <p><u>If any federal funding, permit, or license is involved or required, the Permittee shall notify the SHPO as soon as possible in the planning process to coordinate Section 106 (36 C.F.R. part 800) review.</u></p>	<p>If any federal funding, permit, or license is involved or required, the Permittee shall notify the SHPO as soon as possible in the planning process to coordinate<u>complete any</u> Section 106 (36 C.F.R. part 800) review <u>that is necessary by coordinating with the federal agency or federal authority and SHPO as deemed necessary by the federal agency or federal authority.</u></p>	<p>Revision to reflect the existing programmatic agreement between the U.S. Army Corps of Engineers and the State Historic Preservation Office regarding the coordination of Section 106 review if federal action is required for the Project. This language would also apply should any federal review by the U.S. Fish and Wildlife Service be necessary.</p>

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<p>5.6.1 Other Permits and Regulations</p> <p>The Permittee shall comply with all applicable state rules and statutes. The Permittee shall obtain all required permits for the project and comply with the conditions of those permits unless those permits conflict with or are preempted by federal or state permits and regulations. A list of the permits known to be required is included in the permit application. The Permittee shall submit a copy of such permits to the Commission upon request.</p>	<p>5.6.1 Other Permits and Regulations</p> <p>The Permittee shall comply with all applicable state rules and statutes. The Permittee shall obtain all required permits for the project and comply with the conditions of those permits unless those permits conflict with or are preempted by federal or state permits and regulations. A list of the permits known to be required is included in the permit application. The Permittee shall submit a copy of such permits to the Commission upon request <u>file a copy of all permits of with the Commission.</u></p>	<p>5.6.1 Other Permits and Regulations</p> <p>The Permittee shall comply with all applicable state rules and statutes. The Permittee shall obtain all required permits for the project and comply with the conditions of those permits unless those permits conflict with or are preempted by federal or state permits and regulations. A list of the permits known to be required is included in the permit application. The Permittee shall file <u>submit</u> a copy of all such permits of with <u>to</u> the Commission <u>upon request</u>.</p>	<p>Filing a copy of all permits with the Commission in eDockets has the potential to create confusion, particularly as this is proposed to be a phased construction project, and as permits are amended or otherwise revised, the overall volume of filings on eDockets may make it difficult for navigating the information or finding information by the public. The Company requests that the original language proposed by the Commission be used for Section 5.6.1.</p>
<p>6.0 SPECIAL CONDITIONS</p> <p>Special conditions shall take precedence over other conditions of this permit should there be a conflict.</p> <p><i>[Describe any special conditions]</i> Special Conditions Example Language</p>	<p>6.0 SPECIAL CONDITIONS</p> <p>Special conditions shall take precedence over other conditions of this permit should there be a conflict.</p> <p><i>[Describe any special conditions]</i> Special Conditions Example Language</p>	<p>6.0 SPECIAL CONDITIONS</p> <p>Special conditions shall take precedence over other conditions of this permit should there be a conflict.</p> <p><i>[Describe any special conditions]</i> Special Conditions Example Language</p>	

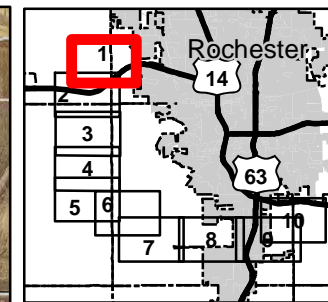
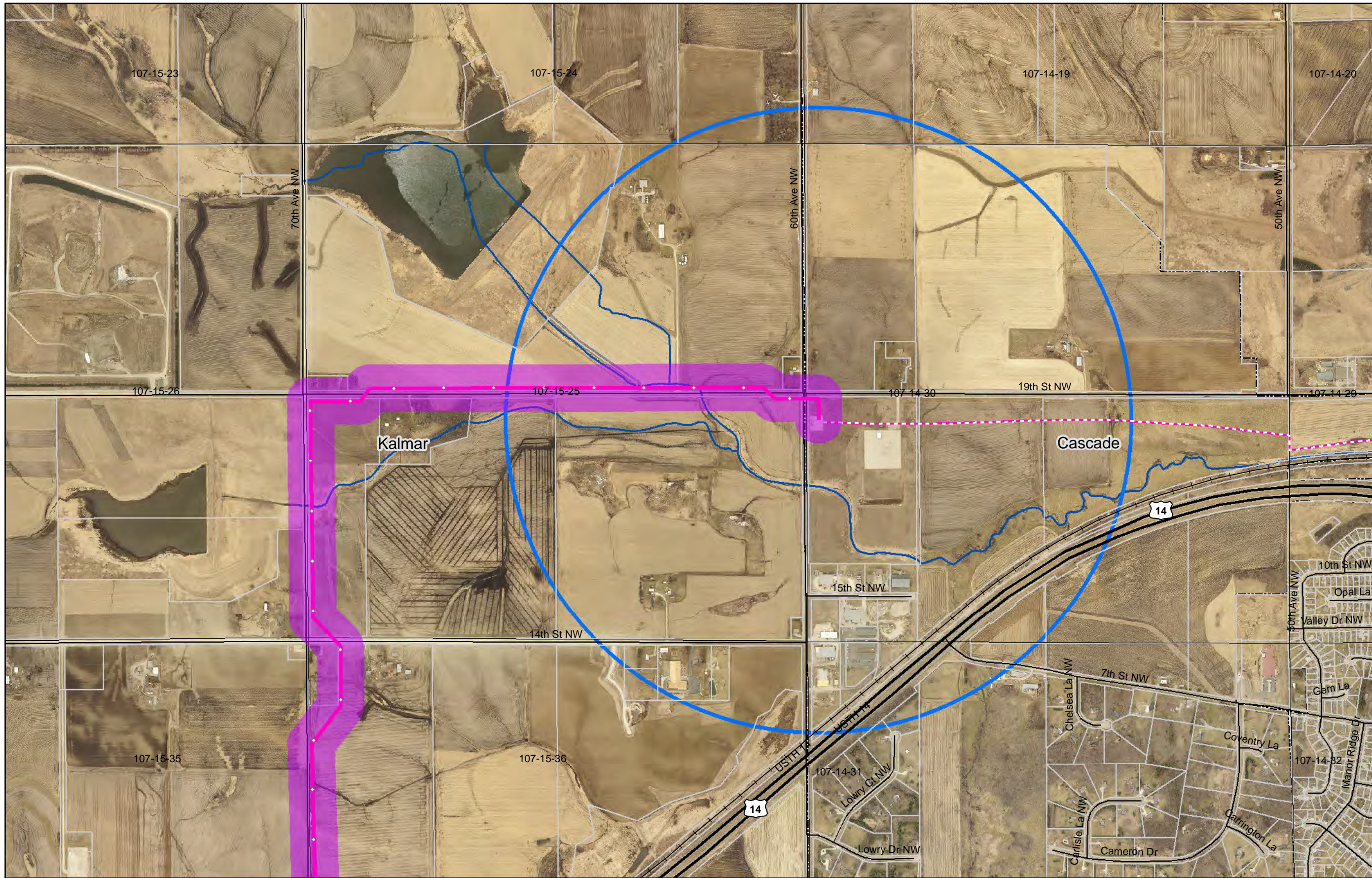
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<p><i>Aquatic Invasive Species</i> As part of the preconstruction reports, the Permittee will include a section evaluating the potential for the occurrence of aquatic invasive species in the project area and describing, if any, the best management practices that apply. The Permittee should identify any infested waters or otherwise indicate that aquatic invasive species are not anticipated. The DNR must be provided an opportunity to review and comment on the plan. The DNR must be notified if any aquatic invasive species are identified in an area not previously identified as infested water.</p>	<p><i>Aquatic Invasive Species</i> As part of the preconstruction reports, the Permittee will include a section evaluating the potential for the occurrence of aquatic invasive species in the project area and describing, if any, the best management practices that apply. The Permittee should identify any infested waters or otherwise indicate that aquatic invasive species are not anticipated. The DNR must be provided an opportunity to review and comment on the plan. The DNR must be notified if any aquatic invasive species are identified in an area not previously identified as infested water.</p>	<p><i>Aquatic Invasive Species</i> As part of the preconstruction reports, the Permittee will include a section evaluating the potential for the occurrence of aquatic invasive species in the project area and describing, if any, the best management practices that apply. The Permittee should identify any infested waters or otherwise indicate that aquatic invasive species are not anticipated. The DNR must be provided an opportunity to review and comment on the plan. The DNR must be notified if any aquatic invasive species are identified in an area not previously identified as infested water.</p>	<p>Revision to reflect the language has been added to Section 5.5.12 as recommended by EERA</p>
<p><i>Wildlife-Friendly Erosion Control Materials</i> The Permittee, in cooperation with the Minnesota Department of Natural Resources, shall use wildlife-friendly erosion control materials in areas known to be inhabited by wildlife species (birds, small mammals, reptiles, and amphibians) susceptible to entanglement in plastic netting.</p>	<p><i>Wildlife-Friendly Erosion Control Materials</i> The Permittee, in cooperation with the Minnesota Department of Natural Resources, shall use wildlife-friendly erosion control materials in areas known to be inhabited by wildlife species (birds, small mammals, reptiles, and amphibians) susceptible to entanglement in plastic netting.</p>	<p><u>6.1</u> Wildlife-Friendly Erosion Control Materials The Permittee, in cooperation with the Minnesota Department of Natural Resources, shall use wildlife-friendly erosion control materials in areas known to be inhabited by wildlife species (birds, small mammals, reptiles, and amphibians) susceptible to entanglement in plastic netting.</p>	<p>Revision to add numbering.</p>
<p><i>Rare and Unique Resources</i> The Permittee shall follow measures and recommendations for avoiding and minimizing impacts to Blanding's turtle populations as outlined in the Minnesota Department of Natural Resources Environmental Review Fact Sheet Series for the Blanding's Turtle.</p>	<p>EERA neither recommended this Special Condition be included nor recommended its removal.</p>	<p><i>Rare and Unique Resources</i> The Permittee shall follow measures and recommendations for avoiding and minimizing impacts to Blanding's turtle populations as outlined in the Minnesota Department of Natural Resources Environmental Review Fact Sheet Series for the Blanding's Turtle.</p>	<p>If Blanding's Turtles are identified during surveys, notification would be covered under Special Condition 6.2.</p>

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<p><i>Construction and maintenance personnel will be made aware of rare resources and plant communities during pre-construction meetings to minimize potential disturbance. The Permittee shall avoid impacts to state-listed endangered, threatened, and special concern species in all areas of the project including temporary workspaces associated with the project.</i></p> <p><i>Rare Species Surveys</i> <i>Known locations of state-listed threatened/endangered species and their habitats have been identified within the project area. These species may occur within the proposed route where suitable habitat exists. The Permittee, in consultation with the DNR, will determine the need for rare species surveys (pre-construction) within the approved route. In the areas where these species are known to exist or where the right-of-way passes through habitats where these species are likely to exist, field surveys may be required. In the event that impacts cannot be avoided, the Permittee would be required to obtain a takings permit from DNR for impacts to the species. The Permittee shall submit results of these efforts to the Commission with the Plan and Profile.</i></p>	<p><i>Construction and maintenance personnel will be made aware of rare resources and plant communities during pre-construction meetings to minimize potential disturbance. The Permittee shall avoid impacts to state-listed endangered, threatened, and special concern species in all areas of the project including temporary workspaces associated with the project.</i></p> <p><i>Rare Species Surveys</i> <i>Known locations of state-listed threatened/endangered species and their habitats have been identified within the project area. These species may occur within the proposed route where suitable habitat exists. The Permittee, in consultation with the DNR, will determine the need for rare species surveys (pre-construction) within the approved route. In the areas where these species are known to exist or where the right-of-way passes through habitats where these species are likely to exist, field surveys may be required. In the event that impacts cannot be avoided, the Permittee would be required to obtain a takings permit from DNR for impacts to the species. The Permittee shall submit results of these efforts to the Commission with the Plan and Profile.</i></p>	<p><u>6.2 Rare and Unique Resources</u> Construction and maintenance personnel will be made aware of rare resources and plant communities during pre-construction meetings to minimize potential disturbance. The Permittee shall avoid impacts to state-listed endangered, threatened, and special concern species in all areas of the project including temporary workspaces associated with the project.</p> <p>The Permittee, in consultation with the <u>U.S. Fish and Wildlife Service and the Minnesota Department of Natural Resources</u> WS and the MnDNR, will determine the need for rare species surveys (pre-construction) within the approved route. In the areas where these species are known to exist or where the right-of-way passes through habitats where the species are likely to exist, field surveys may be required. In the event impacts cannot be avoided, the Permittee may need to obtain a take permit from the <u>U.S. Fish and Wildlife Service and the MnDNR</u> or the USFWS for the species of concern. The Permittee shall submit the results of these efforts to the Commission with its Plan and Profile filing.</p>	<p>Revision to add numbering.</p> <p>Revision to reflect Permit nomenclature and not the nomenclature of the Company's Findings and Brief.</p>

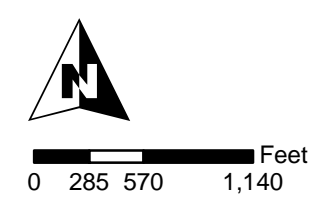
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	<p><u>The Permittee, in consultation with the USFWS and the MnDNR, will determine the need for rare species surveys (pre-construction) within the approved route. In the areas where these species are known to exist or where the right-of-way passes through habitats where the species are likely to exist, field surveys may be required. In the event impacts cannot be avoided, the Permittee may need to obtain a take permit from the MnDNR or the USFWS for the species of concern. The Permittee shall submit the results of these efforts to the Commission with its Plan and Profile filing.</u></p>		
<p><i>Contamination Survey</i> <i>The Permittee, in consultation with the MPCA, shall identify any contaminated sites as it performs its detailed survey and acquisition work prior to the submittal of the final plan and profile to the Commission.</i></p>	<p><i>Contamination Survey</i> <i>The Permittee, in consultation with the MPCA, shall identify any contaminated sites as it performs its detailed survey and acquisition work prior to the submittal of the final plan and profile to the Commission.</i></p>	<p><u>6.3</u> Contamination Survey The Permittee, in consultation with the MPCA, shall identify any contaminated sites as it performs its detailed survey and acquisition work prior to the submittal of the final plan and profile to the Commission.</p>	<p>Revision to add numbering.</p>

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	<p>Permittee shall submit a <u>Vegetation Management Plan (VMP) with the Environmental Control Plan. The purpose of the VMP shall be to identify measures to minimize the disturbance and removal of vegetation for the Project, prevent the introduction of noxious weeds and invasive species, and re-vegetate disturbed non-cropland area with appropriate native species in cooperation with landowner and state, federal, and local resource agencies, such that such re-vegetation does not negatively impact safe and reliable operation of the Project.</u></p>	<p><u>6.4 Vegetation Management Plan</u> Permittee shall submit a Vegetation Management Plan (VMP) with the Environmental Control <u>Mitigation</u> Plan. The purpose of the VMP shall be to identify measures to minimize the disturbance and removal of vegetation for the Project, prevent the introduction of noxious weeds and invasive species, and re-vegetate disturbed non-cropland area with appropriate native species in cooperation with landowner and state, federal, and local resource agencies, such that such re-vegetation does not negatively impact safe and reliable operation of the Project.</p>	<p>Revision to add numbering and heading. Revision to reflect abbreviation identified earlier in Permit.</p>
<p>10.4 As-Builts</p> <p>Within 90 days after completion of construction, the Permittee shall submit copies of all final as-built plans and specifications developed during the project.</p>	<p>10.4 As-Builts</p> <p>Within 90 days after completion of <u>each phase of</u> construction, the Permittee shall submit copies of all final as-built plans and specifications developed during the project <u>for each project phase (See Route Permit at Section XX).</u></p>	<p>10.4 As-Builts</p> <p>Within 90 days after completion of each phase of construction, the Permittee shall submit copies of all final as-built plans and specifications developed for each project phase (See Route Permit at Section XX).</p>	<p>Cross-reference not necessary.</p>

Generic Route Permit Template Language	EERA Proposed Revisions	MERC Proposed Revisions Over EERA Revisions	MERC Rationale for Revision
<p>10.5 GPS Data</p> <p>Within 90 days after completion of construction, the Permittee shall submit to the Commission, in the format requested by the Commission, geo-spatial information (e.g., ArcGIS compatible map files, GPS coordinates, associated database of characteristics) for the pipeline and associated facilities.</p>	<p>10.5 GPS Data</p> <p>Within 90 days after completion of <u>each phase of construction (See Route Permit at Section XX)</u>, the Permittee shall submit to the Commission, in the format requested by the Commission, geo-spatial information (e.g., ArcGIS geodatabase or shapefiles, GPS coordinates, associated database of characteristics) for the pipeline and associated facilities.</p>	<p>10.5 GPS Data</p> <p>Within 90 days after completion of each phase of construction (See Route Permit at Section XX), the Permittee shall submit to the Commission, in the format requested by the Commission, geo-spatial information (e.g., ArcGIS geodatabase or shapefiles, GPS coordinates, associated database of characteristics) for the pipeline and associated facilities.</p>	<p>Cross-reference not necessary.</p>

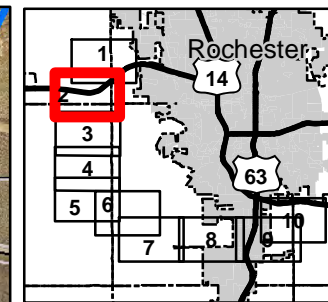
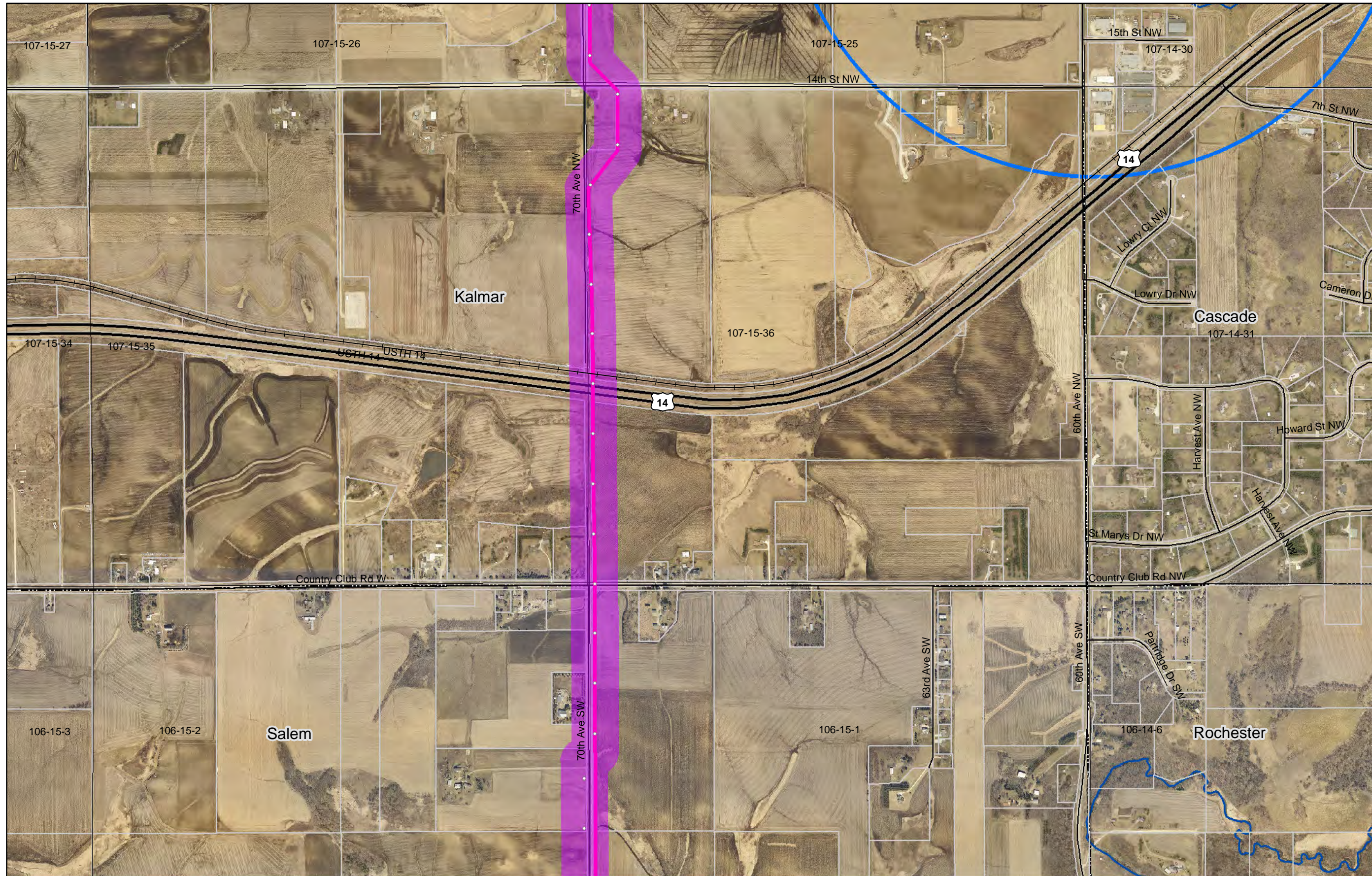


- Anticipated Alignment
- Milepost
- Route Width
- Extra Temporary Workspace
- District Regulator Station Buffer
- Town Border Station Buffer
- Existing MERC Distribution Main
- Roadway
- Railroad
- Parcels
- Municipality
- Public Waters
- Inventory Waters

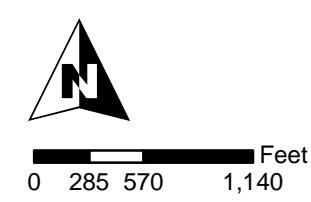


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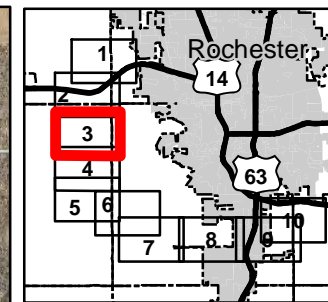
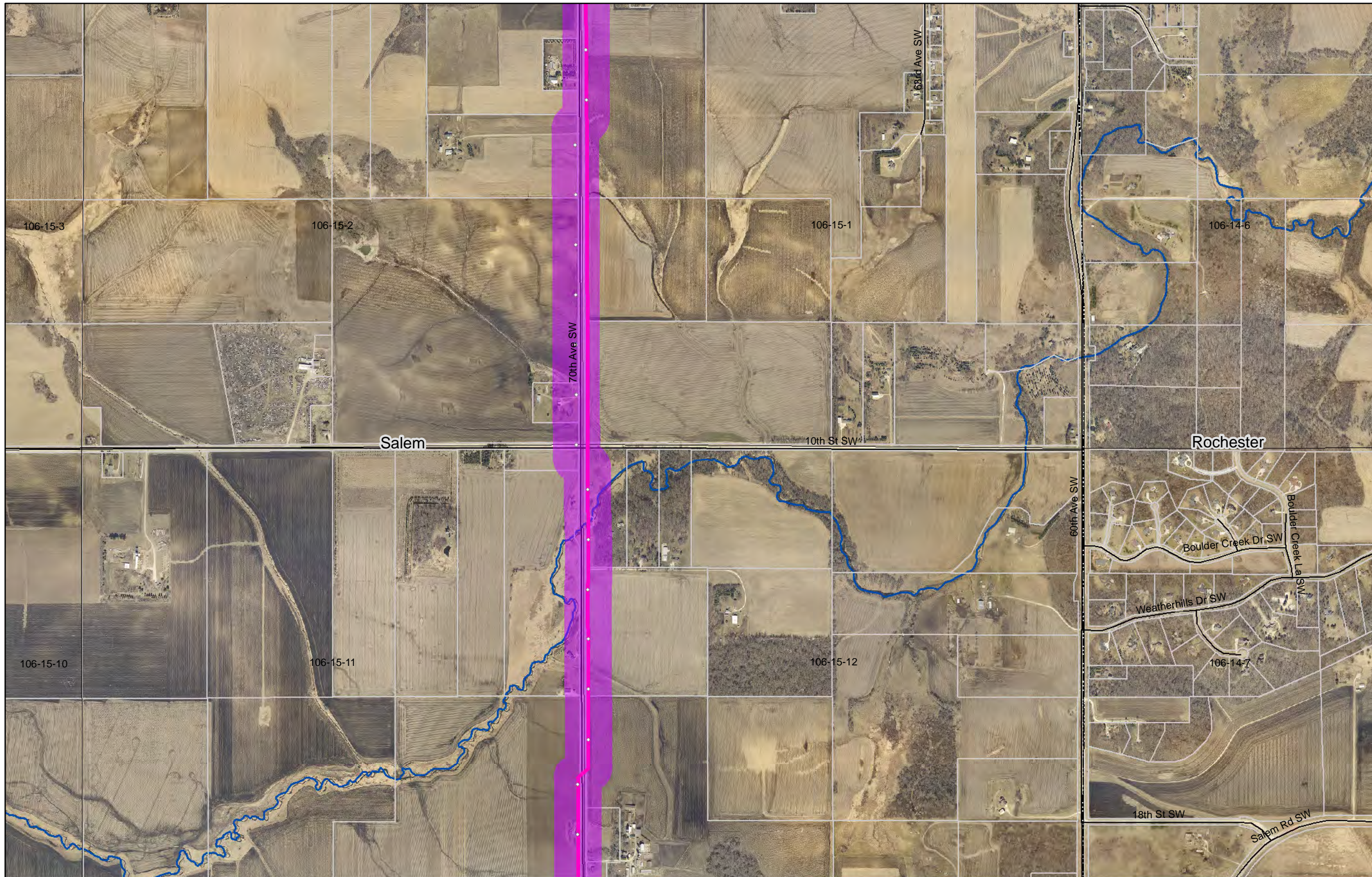
- Anticipated Alignment
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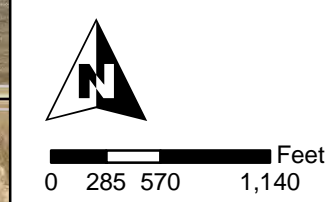
PROPOSED ROUTE PERMIT MAPS

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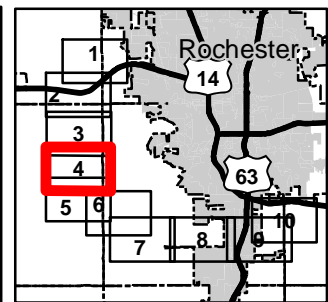
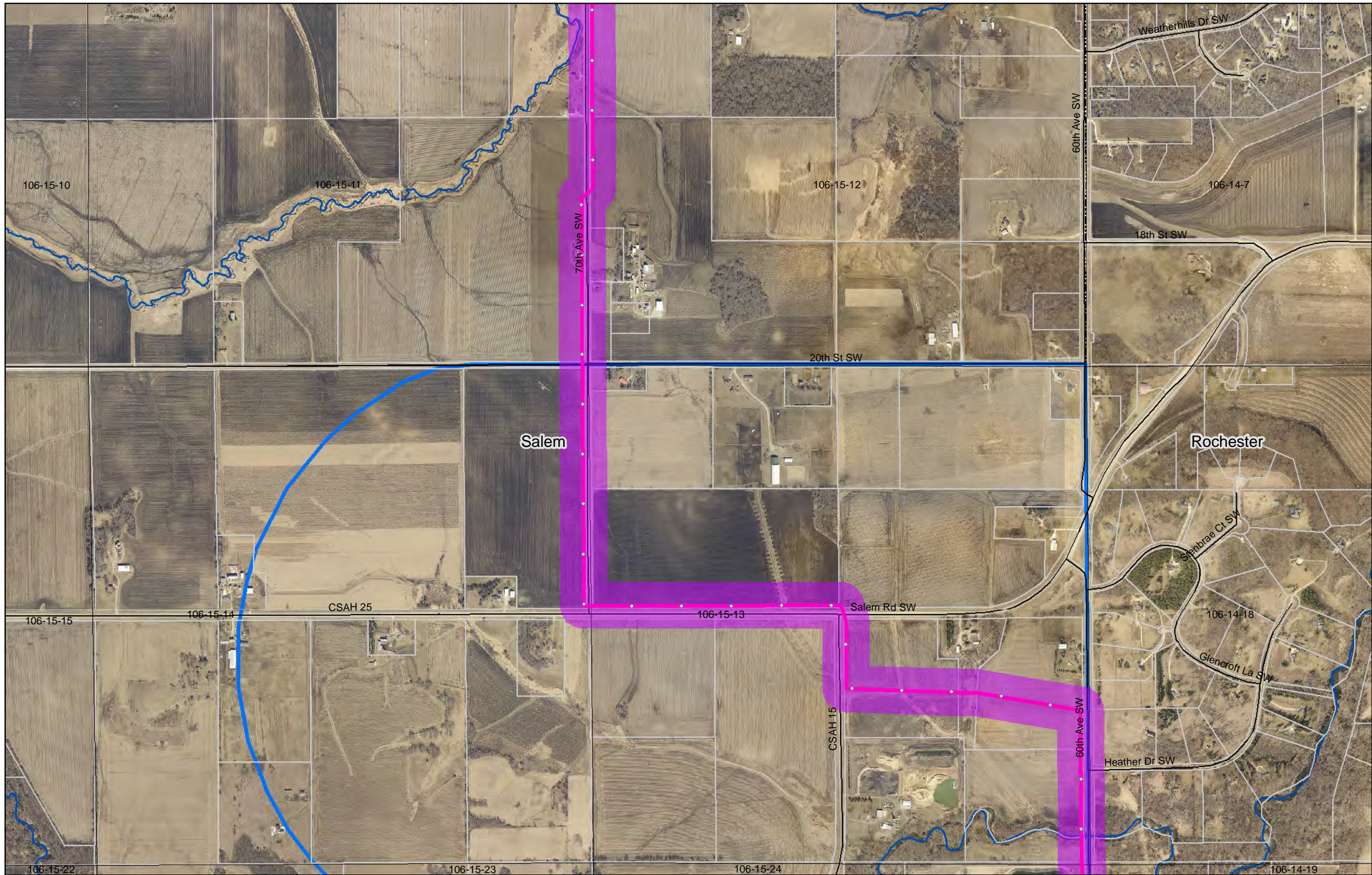


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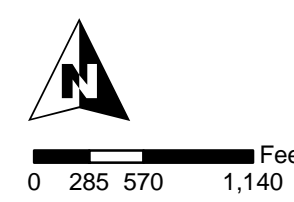


PROPOSED ROUTE PERMIT MAPS

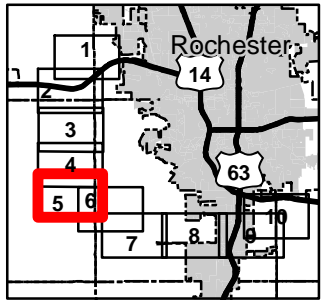
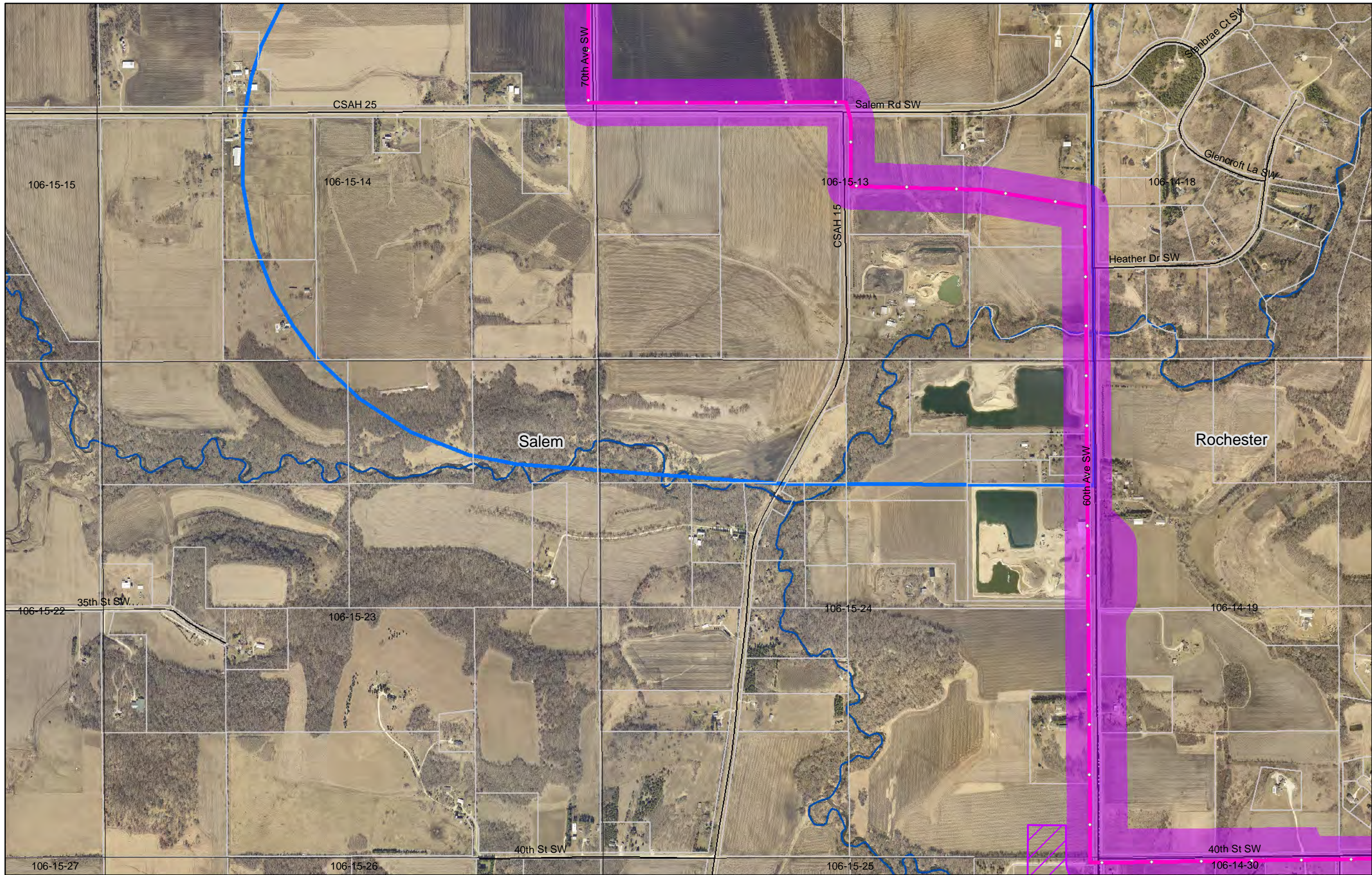
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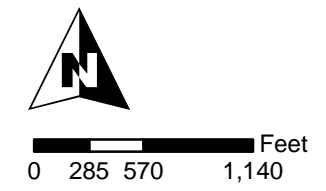
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- ▭ Municipality
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PROPOSED ROUTE PERMIT MAPS
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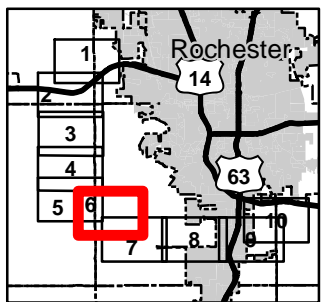
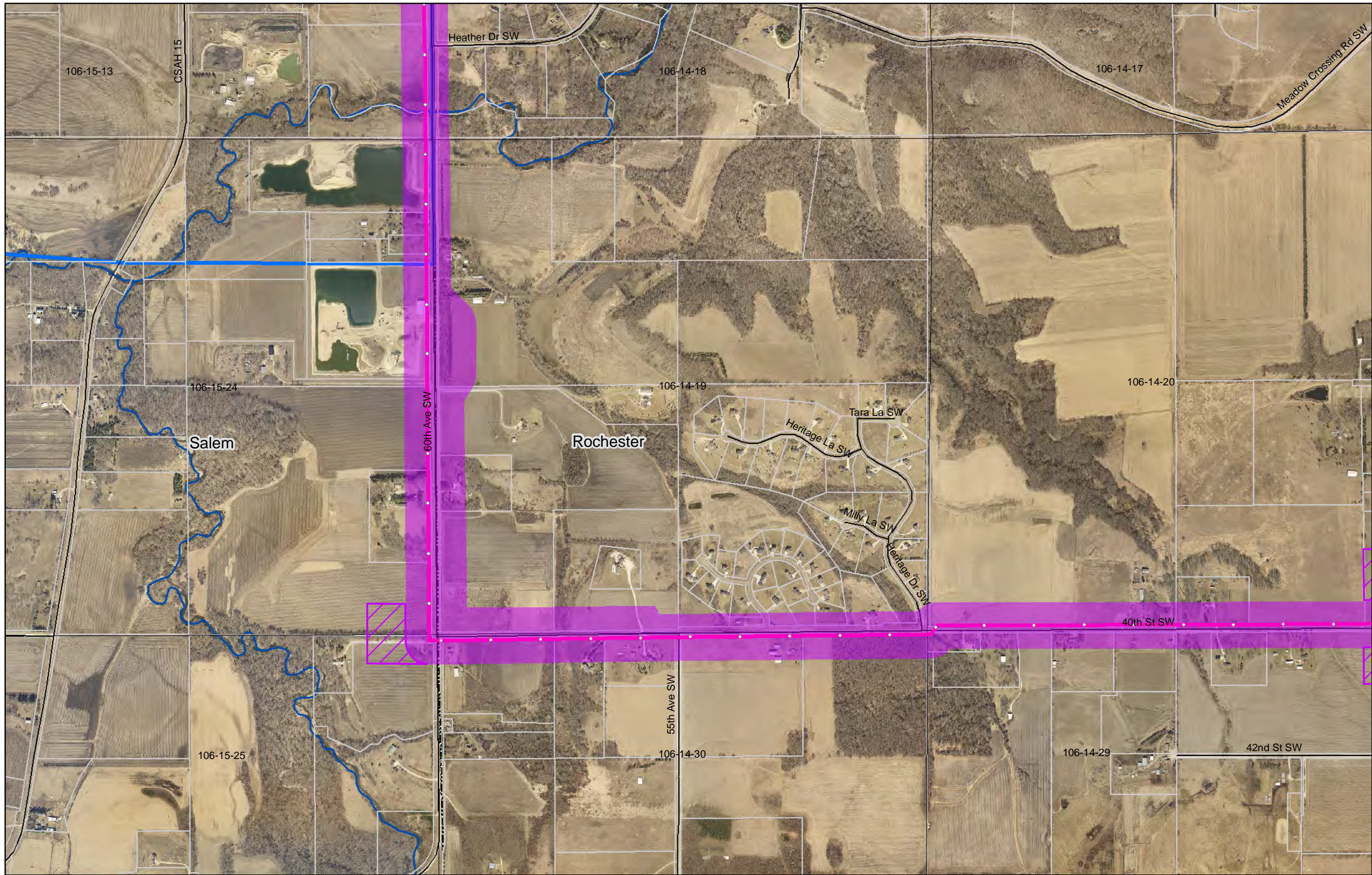


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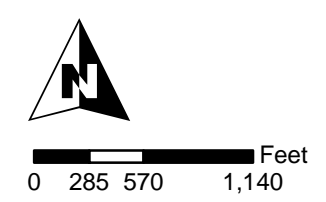


PROPOSED ROUTE PERMIT MAPS

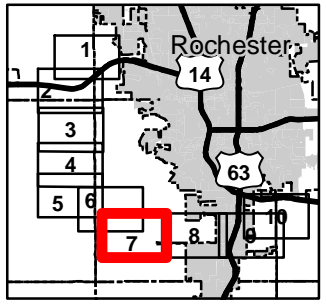
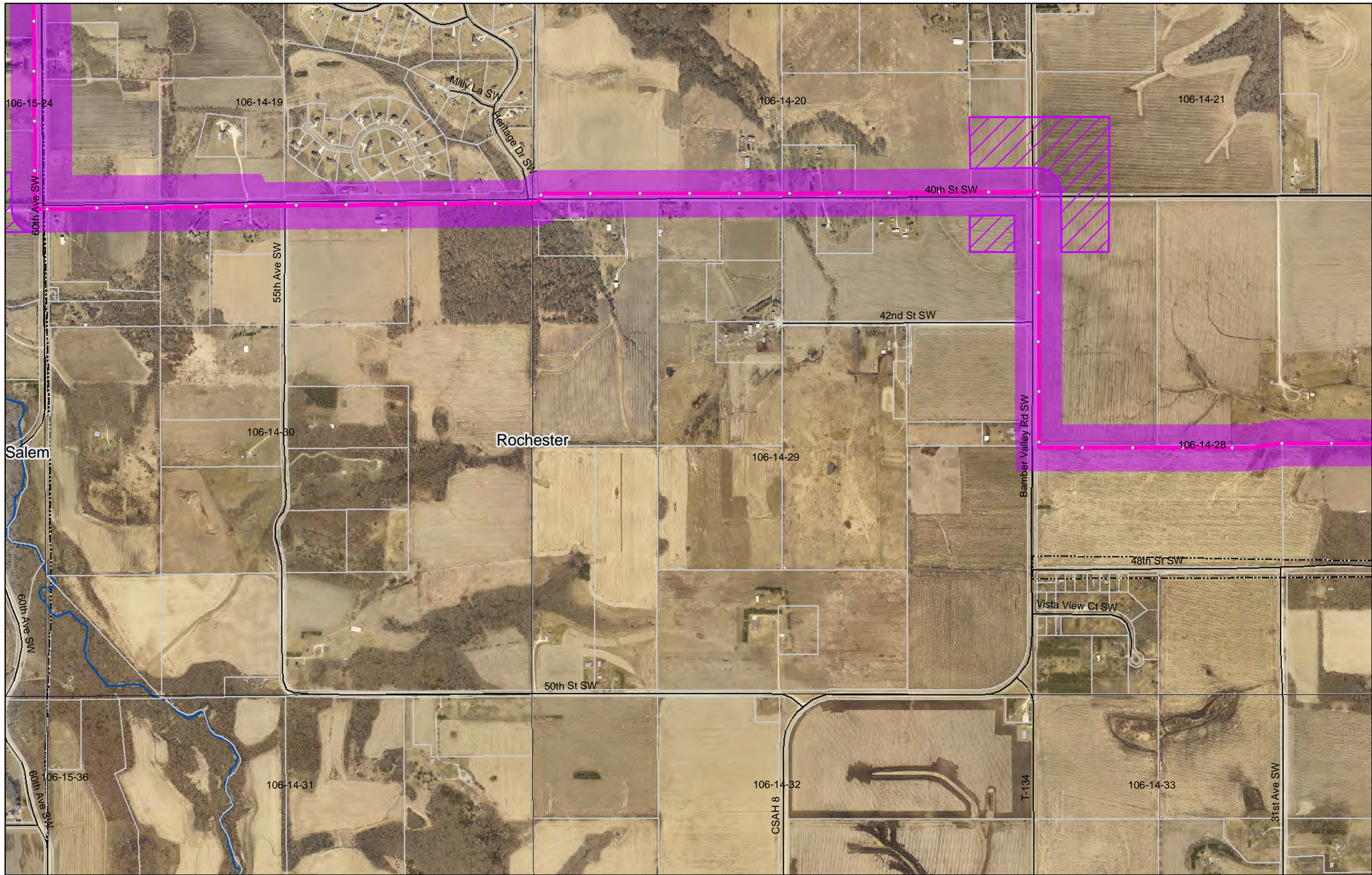
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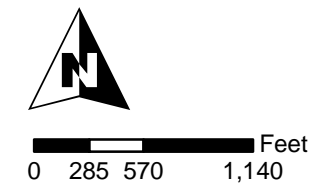
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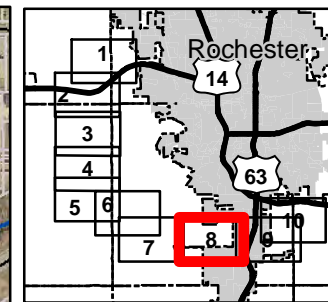
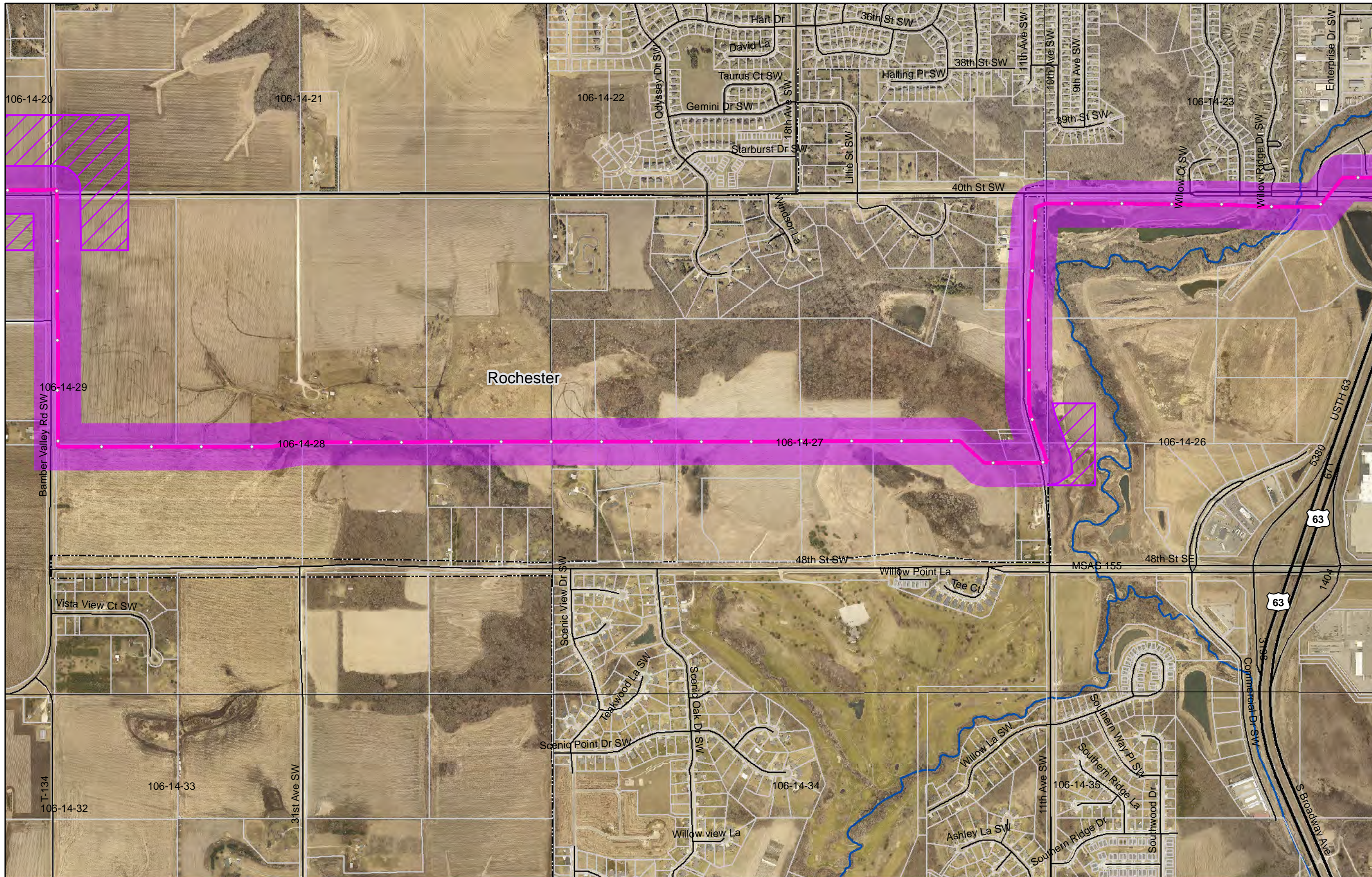
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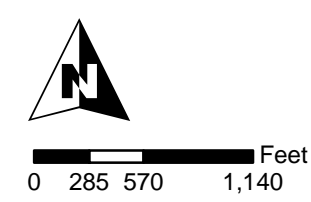
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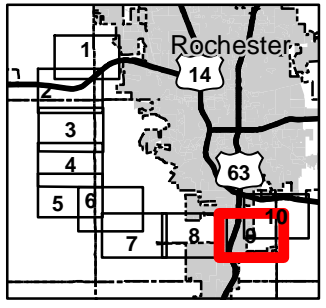
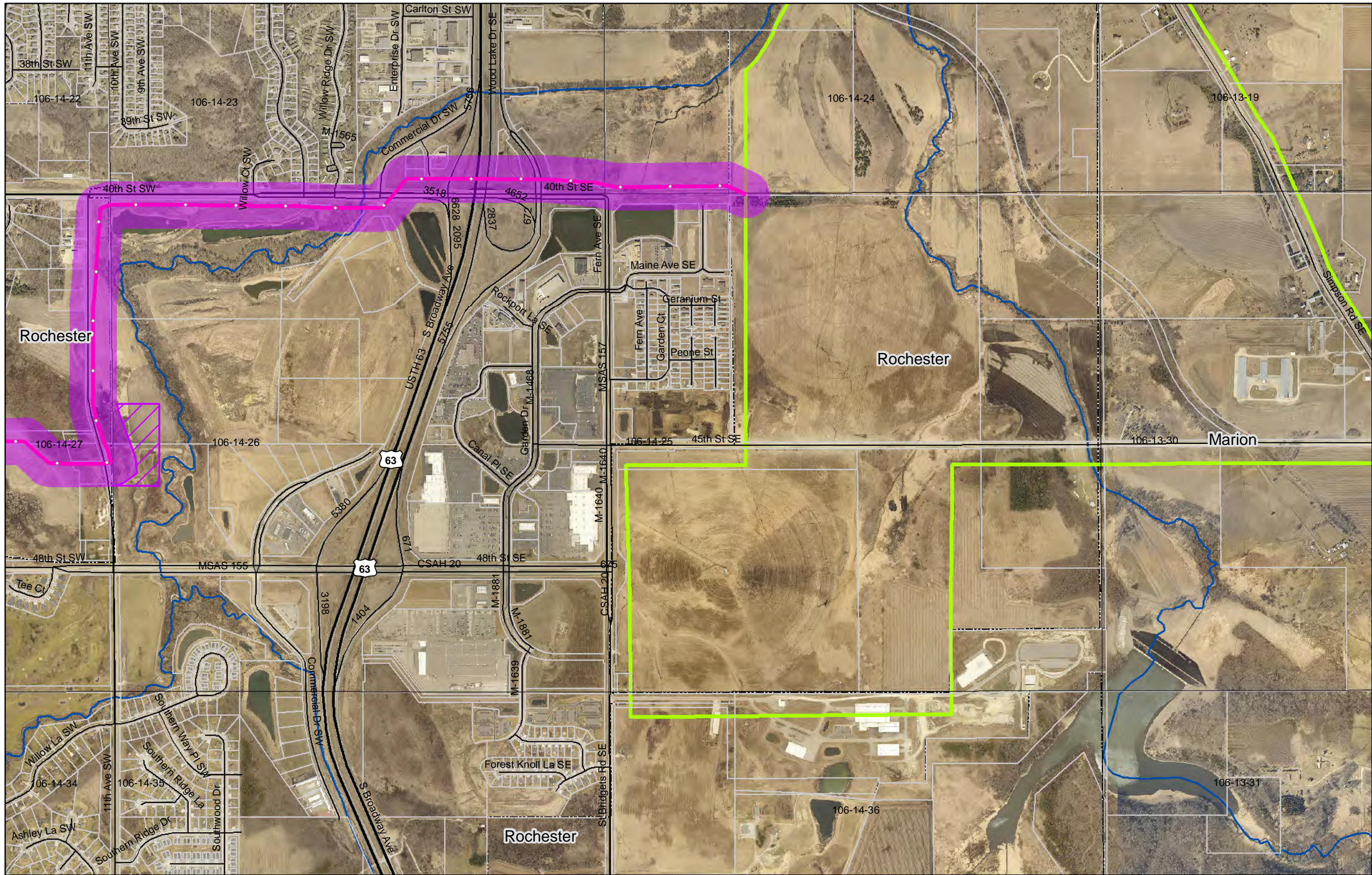


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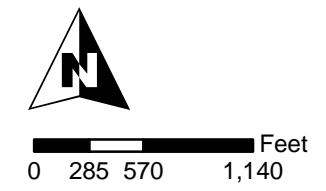


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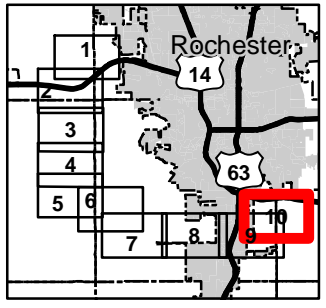
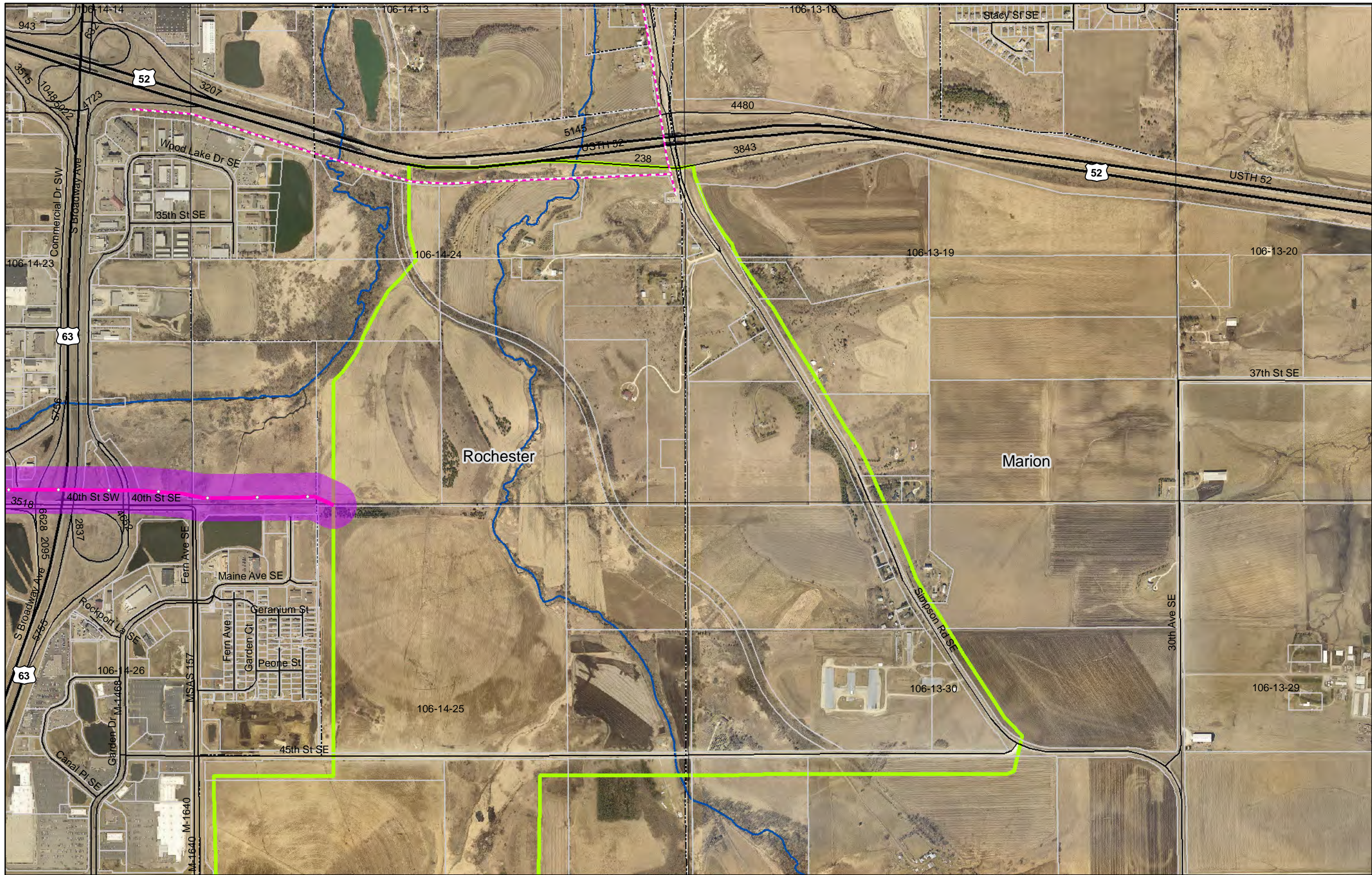


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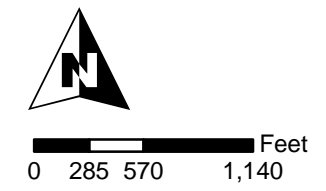


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-  Anticipated Alignment
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Rochester Natural Gas Pipeline
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In the Matter of the Petition of
Minnesota Energy Resources Corporation
for a Route Permit for the Rochester
Natural Gas Pipeline Project in
Olmsted County

MPUC Docket No. G011/GP-15-858
OAH Docket No. 8-2500-33180

CERTIFICATE OF SERVICE

I, Jill N. Yeaman, hereby certify that on the 30th day of December, 2016, on behalf of Minnesota Energy Resources Corporation (MERC), I electronically filed a true and correct copy of **MINNESOTA ENERGY RESOURCES CORPORATION'S REPLY TO ROUTE PERMIT COMMENTS OF EERA** on www.edockets.state.mn.us. Said document was also served via U.S. mail and electronic service as designated on the attached service list.

/s/ Jill N. Yeaman

Jill N. Yeaman

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_15-858_Official Service List
Laura	Demman	laura.demman@nngco.com	Northern Natural Gas Company	1111 S. 103rd Street Omaha, NE 68125	Electronic Service	No	OFF_SL_15-858_Official Service List
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_15-858_Official Service List
Mary	Holly	mholly@winthrop.com	Winthrop & Weinstine, P.A.	225 S Sixth St Ste 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-858_Official Service List
Linda	Jensen	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_15-858_Official Service List
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-858_Official Service List
Amber	Lee	ASLee@minnesotaenergyresources.com	Minnesota Energy Resources Corporation	2665 145th St W Rosemount, MN 55068	Electronic Service	No	OFF_SL_15-858_Official Service List
John	Lindell	john.lindell@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_15-858_Official Service List
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	No	OFF_SL_15-858_Official Service List
Rick	Moser	rjmoser@integrysgroup.com	MERC	700 N Adams Street Green Bay, WI 54307	Electronic Service	No	OFF_SL_15-858_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Catherine	Phillips	catherine.phillips@we-energies.com	We Energies	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_15-858_Official Service List
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	Ste 122 9100 W Bloomington Frwy Bloomington, MN 55431	Electronic Service	Yes	OFF_SL_15-858_Official Service List
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_15-858_Official Service List
Kodi	Verhalen	kverhalen@briggs.com	Briggs & Morgan	2200 IDS Center 80 South Eighth Street Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_15-858_Official Service List
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_15-858_Official Service List