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May 29, 2013

**VIA ELECTRONIC FILING**

Dr. Burl W. Haar  
Executive Secretary  
Minnesota Public Utilities Commission  
350 Metro Square Building  
121 Seventh Place East  
St. Paul, MN 55101

**Re: *In the Matter of the Route Permit Application by Great River Energy and Xcel Energy for a 345 kV Transmission Line from Brookings County, South Dakota to Hampton, Minnesota***  
**MPUC Docket No. ET-2/TL-08-1474**

Dear Dr. Haar:

Great River Energy, a Minnesota cooperative corporation, and Northern States Power Company, doing business as Xcel Energy (“Permittees”), request that the Minnesota Public Utilities Commission (“Commission”) approve a minor alteration of the Route Permit for the Brookings County-Hampton 345 kV Transmission Line Project (“Project”) pursuant to Minnesota Rule 7850.4800.

Specifically, Permittees request that the Commission approve a route modification to the approved route in the Chub Lake Substation to Hampton Substation (“Chub Lake to Hampton”) segment in western Dakota County, Structure Nos. 0961-007 to 0961-010, to address stakeholder and environmental concerns. Permittees believe the modification is reasonable and approval is appropriate because the requested alteration has impacts comparable to the impacts associated with the initially approved route (“Permitted Route”) and Anticipated Alignment and, therefore, does not result in significant change in the human or environmental impact of the facility. The landowners affected by this route modification all support the proposed change.

**Background**

On September 14, 2010, the Commission issued a Route Permit for all segments of the Project with the exception of the segment between the Cedar Mountain Substation near Franklin, Minnesota, and the Helena Substation near New Market, Minnesota. On March 1, 2011, the Commission issued a Route Permit Addendum authorizing construction of the final segment between the Cedar Mountain and Helena substations (the permits will be collectively referred to as the Route Permit). Since the Route Permit was issued, Permittees have undertaken more site specific review, including real estate records review, and commenced detailed design work.

### Applicable Law

A minor alteration is a change in a high voltage transmission line that does not result in significant changes in the human or environmental impact of the facility subject to the Power Plant Siting Act (Minn. Stat. Ch. 216E). Permittees requesting a minor alteration must submit the application to the Commission. Minn. R. 7850.4800. The Commission is authorized to approve a minor alteration after providing “at least a ten-day period for interested persons to submit comments on the application or to request that the matter be brought to the [C]ommission for consideration.” Minn. R. 7850.4800, Subp. 2.

### Minor Alteration

Permittees request that the Commission approve the Minor Alteration in western Dakota County. An overview map showing the location of the Minor Alteration request is provided as **Exhibit A**. The specific portion of the segment as permitted by the Commission in the Route Permit and the minor alteration requested in that area is shown on **Exhibit B**. **Exhibit B** shows the Permitted Route and Anticipated Alignment and the Modified Route (150’ Route/Right-of-Way) and Modified Alignment. An impact summary table is enclosed as **Exhibit C**.

Permittees request a minor alteration in this area to reduce: impacts to landowners, the amount of tree clearing, and impacts on the Vermillion River (a designated trout stream).

### **Landowner Considerations**

The distance of the Anticipated Alignment and Modified Alignment centerlines to homes in this area is provided in **Table 1**. The Anticipated Alignment comes very close to the Boyum home (80 feet), whereas the Modified Alignment would run along the backside of the Boyum property and greatly increases the distance of the line to the Boyum home (now 1,011 feet from centerline), the Korba home (now 1,463 feet from centerline), and the O’Brien home (now 543 feet from centerline). Distance to centerline to the other O’Brien home (rental) would also be greater (now 223 feet from centerline), and the alignment would be to the rear of the house rather than in front of the house.

<b>Table 1. Distance to Centerline (feet)</b>			
<b>Parcel ID</b>	<b>Owner</b>	<b>Anticipated Alignment</b>	<b>Modified Alignment</b>
037-130180078013	Boyum Family Farms	80	>500 (1,011)
037-130180079010	Korba	294	>500 (1,463)
037-130180078011	O’Brien	179	>500 (543)
037-130180076010	O’Brien	105	223

The landowners in this neighborhood got together regarding the alignment in this area and all are in agreement with the Modified Alignment.

### **Tree Clearing Considerations**

The Anticipated Alignment would result in significant tree clearing along the side and front of the home on the Boyum property as well as in the front of the Korba home opposite the Boyums, as shown in the photo below.



Boyum Property on the left, Korba property on the right

The Modified Alignment would result in very little tree clearing in this neighborhood.

### **Vermillion River Considerations**

The Vermillion River crossing associated with the Anticipated Alignment has significantly more trees than the Vermillion River crossing in the Modified Alignment, as shown in the photos below. Vegetative buffer along the river is critical for a designated trout stream. In addition, there would be a transmission structure much closer to the river on the Anticipated Alignment (about 65 feet from the river) versus the Modified Alignment (about 215 feet from the river).



Vermillion River Crossing, Anticipated Alignment



Vermillion River Crossing, Modified Alignment

The Minor Alteration will reduce some types of impacts and increase others, as follows:

- Impacts to homes are reduced along the Modified Alignment because the distance between the line and homes is greater with the Modified Alignment, as discussed above
- The length of the line using the Modified Alignment is 0.2 mile shorter than the Anticipated Alignment (0.6 mile vs. 0.8 mile)
- Acres of cropland affected are reduced (4.3 vs. 4.4 acres) on the Modified Alignment versus the Anticipated Alignment
- Fewer acres of woodland (hence tree clearing) are impacted on the Modified Alignment (0.5 acres vs. 1.3 acres)
- Acres of wetland (field-verified) affected are greater (3.8 vs. 2.8 acres) on the Modified Alignment
- Impacts to the Vermillion River are reduced on the Modified Alignment, as discussed above.
- The Modified Alignment avoids a potential conflict with a Met Council sewer manhole.

On balance, the impacts of the Modified Alignment are comparable to the Anticipated Alignment. The routing factors identified in Minn. Rule 7850.4100 are discussed in **Table 2**.

**Table 2. Routing Factors**

<b>Alignment Comparisons Minn. R. 7850.4100</b>	
A. Human settlement	Neither alignment would result in a home being located within the right-of-way; therefore, neither would require displacement. The Modified Alignment minimizes the proximity to several homes in this area, as shown in <b>Table 1</b> .
B. Effects on public health and safety	No impacts on public health and safety are anticipated for either of the alignments.
C. Effects on land-based economies	No impacts on land-based economies are anticipated for either of the alignments.
D. Effects on archaeological and historic resources	No cultural resources have been identified where these alignments are located.
E. Natural environment	Impacts to the natural environment are shown on <b>Exhibit C</b> . Wetland acreages in the ROW are slightly higher with the Modified Alignment but impacts to the Vermillion River would be greater on the Anticipated Alignment because of the tree removal that would be necessary.
F. Effects on rare and unique natural resources	No rare and unique resources have been identified where the alignments are located.
G. Design options that maximize energy efficiencies, mitigate adverse environmental effects and accommodate expansion	The design option is the same for both alignments.
H. Use or paralleling of existing rights-of-way, survey lines, natural division lines, and agricultural field boundaries	Percent ROW sharing for the Anticipated Alignment is 43% (with a county state aid highway ROW) versus 0% (cross country) for the Modified Alignment.

I. Use of existing large electric power generating plant sites	Not applicable
J. Use of existing transmission line rights-of-way	Neither alignment follows existing transmission lines.
K. Electrical system reliability	Both alignments will enable reliable transmission of electricity.
L. Costs	The estimated costs are very similar on both alignments (Anticipated Alignment \$1.366 million, Modified Alignment \$1.325 million), difference of \$11,000.

**Notice**

Permittees have developed the enclosed landowner list (**Exhibit D**) identifying those landowners within the route width for the proposed Modified Route.

**Conclusion**

Permittees believe that the proposed alteration does not significantly change the impacts of the Project on humans or the environment and request that the Commission approve this minor alteration request. Specifically, Permittees request that the Modified Route as shown on **Exhibit B** be approved for construction.

It is anticipated that the plan and profile for the Chub Lake Substation to Hampton Substation segment of the Project will be filed in late May 2013 with this Minor Alteration application incorporated. The submission will include a notation stating that separate Commission approval is necessary beyond approval of the plan and profile. Permittees request that the Commission approve both this minor alteration and the plan and profile for the Chub Lake to Hampton segment.

Please contact me at (763) 445-5975 if you have any questions regarding this filing.

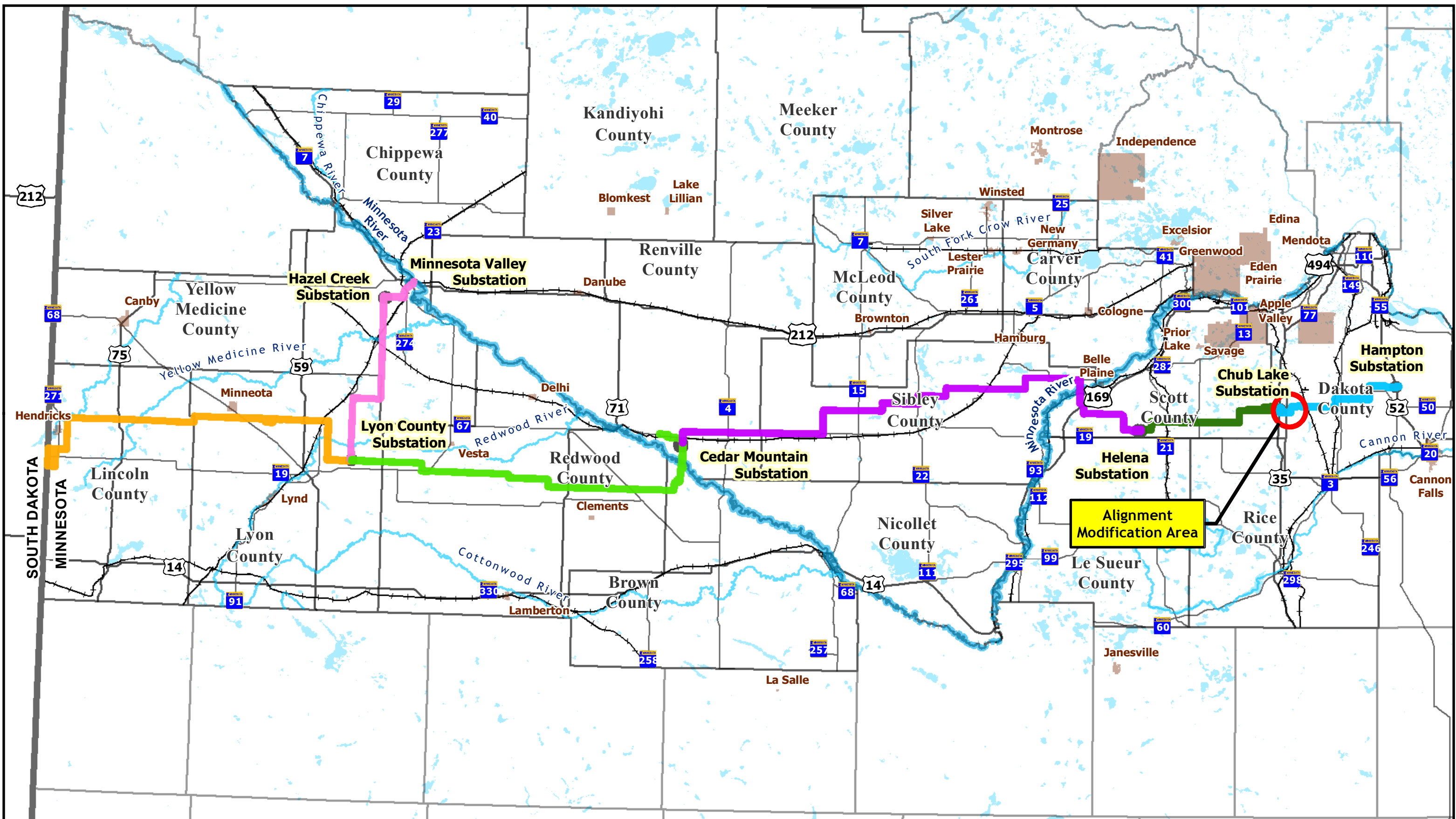
Sincerely,

GREAT RIVER ENERGY



Dan Leshner  
Routing Lead

cc: (w/enc) Landowner Service List  
Deborah Pile, Department of Commerce, Energy Facility Permitting



The route shown has been approved by the Minnesota Public Utilities Commission. This map also depicts an anticipated centerline, which is subject to change within the approved route based on engineering or environmental constraints.

0 5 10 Miles

- Substation Site
- County
- US Highway
- MN Highway
- ++ Railroad
- Minnesota River (Section 10 Water)
- Lake

- Project Segment**
- Brookings County (MN Border) to Lyon County
  - Lyon County to Cedar Mountain to Franklin
  - Cedar Mountain to Helena

- Helena to Chub Lake
- Chub Lake to Hampton
- Lyon County to Minnesota Valley

Path: \\mspe-gis-file\GIS\Proj\GREG\160408\map\_docs\final\PU\Chub\_Hampton\Exhibit\_A\_Overview\_RouteAlterations\_ChubLake\_Hampton.mxd

Scott County

EUREKA T 113 R 20

KRAPU JEFFERY A & ANDREA M

MATHIOWETZ MARK & LORI

PETERSON PR

PETERSON PR

18

KRAPU JEFFERY A & ANDREA M

0961-011

NEW MARKET T 113 R 21

BELZER JEFFREY A

FLAHERTY KEVIN M & ELIZABETH

0961-010

FLAHERTY KEVIN M & ELIZABETH

HANSON CRAIG & LOIS M CONMY

BOYUM FAMILY FARMS LLLP

0961-009

OBRIEN EDWARD & SHELBY

037-130180076010 OBRIEN EDWARD & SHELBY

13

BRAUN MICHAEL SCOTT

0961-008

OBRIEN EDWARD T JR & S

KAUFENBERG RAYMOND E & DONIA L

037-130180078011 OBRIEN EDWARD T JR & S

0961-007

037-130180078013 BOYUM FAMILY FARMS LLLP

037-130180079010 KORBA EDWARD J & PATRICIA

0961-006

BOYUM FAMILY FARMS LLLP

KAUFENBERG RAYMOND E & DONIA L

BOYUM FAMILY FARMS LLLP

KORBA EDWARD J & DONIA L PATRICIA

BOYUM FAMILY FARMS LLLP

PEDERSON DWIGHT W & DONNA M

BREID DUANE G & CHARLENE M

HETCHLER DAVID & STEPHANIE

BRUNKO KIMBERLY T

JACOBSON GRANT D & ELIZABETH

Dakota County

PEDERSON DWIGHT E & DONNA M

SATHER WILLIAM A & KAREN M

PETERSON SHEILA DARLENE

BRUNKO KIMBERLY T

EILERS ELIZABETH A

9

DEIMERLY KAREN J

JOHNSON REEF R

RUMMENIE REBECCA J & NEAL R

JOHNSON DARYL S & MICHELLE M

GREENE MITCHELL E

GERGEN THOMAS V

MELHOUSE NATALIE J

ERIKSON

ESTREM GARY R & EUNICE M

MILLER MATTHEW W

MALWITZ LONNIE D & GAYLE L

MALWITZ LONNIE D & GAYLE L



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1:6,000



Date: 5/29/2013

- Pole Location
- - - Modified Alignment
- Anticipated Alignment
- ROW within Permitted Route (For analysis only)
- Modified ROW

- Township
- County
- City
- Home
- Permitted Route
- Modified Route

**Exhibit B**  
**Minor Alteration**  
**Chub Lake to Hampton**

Brookings County - Hampton  
345 kV Transmission Line

**Exhibit C- Impact Summary**

		Chub Lake to Hampton (Anticipated Alignment)	Chub Lake to Hampton (Modified Alignment)
ROW Type <sup>1</sup>	Length (mi)	0.8	0.6
	Acres in ROW	14.6	11.7
	CSAH ROW (mi)	0.3	0.0
	Township Road ROW (mi)	0.0	0.0
	Interstate (mi)	0.0	0.0
	Field Line (mi)	0.0	0.0
	Cross Country (mi)	0.5	0.7
	Percent ROW Sharing	43%	0%
Prime Farmland <sup>2</sup>	All areas of Prime Farmland (Acres)	7.2	1.3
	Percent of Area Prime Farmland	49%	11%
	Prime Farmland if Drained (Acres)	5.8	9.5
	Percent of Area Prime Farmland if Drained	40%	82%
	Farmland of Statewide Importance (Acres)	1.0	0.6
	Percent of Area Farmland of Statewide Importance	7%	5%
MLCCS Land Cover <sup>3</sup>	Woodland (acres)	1.3	0.5
	Woodland (percentage)	9.0%	3.9%
	Cropland (acres)	4.4	4.3
	Cropland (percentage)	30.3%	36.8%
	Wetland (acres)	2.0	3.3
	Wetland (percentage)	14.0%	28.2%
	Grass (acres)	2.8	3.3
	Grass (percentage)	19.3%	28.2%
	Impervious (acres)	4.0	0.6
	Impervious (percentage)	27.4%	4.8%



Wetland (Field Verified) <sup>4</sup>	Field Verified Wetlands (Acres)	2.8	3.8
	Percent of Area Field Verified Wetland	19%	32%

<sup>1</sup> Desktop aerial photo interpretation using 2011 NAIP and BING Aerial Imagery and published transportation data from Federal Highway Administration, Minnesota Department of Transportation, and Dakota County

<sup>2</sup> Natural Resources Conservation Service SUURGO soils database

<sup>3</sup> Minnesota Land Cover Classification System database, Minnesota Department of Natural Resources. Woodland environment include tree plantation, forest, and shrubland. Cropland environment include agricultural land. Wetland environment include wetland emergent veg. Grass environment include short grasses, tall grasses, and dry tall grasses. Impervious environment include 26-50% impervious.

<sup>4</sup> Desktop aerial photo interpretation by HDR, Inc., field verified by visual inspection from public road right of way

## **Exhibit D**

### **Landowners within the Proposed Modified Route**

*Edward & Shelbie O'Brien  
24525 Dodd Blvd  
Lakeville, MN 55044*

*Boyum Family Farms LLLP  
24729 Dodd Boulevard  
Lakeville, MN 55044*

*Jeffrey & Andrea Krapu  
24315 Dodd Boulevard  
Lakeville, MN 55044*

*Great River Energy  
12300 Elm Creek Boulevard  
Maple Grove, MN 55369  
(Flaherty Parcel)*