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May 26, 2016

**VIA ELECTRONIC FILING**

Mr. Daniel P. Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
121 Seventh Place East, Suite 350  
Saint Paul, MN 55101-2147

**Re: In the Matter of the Application of Great River Energy for a Route Permit for a 115 kV Transmission Project Near Palisade, Minnesota in Aitkin County  
MPUC Docket No. ET2/TL-15-423**

Dear Mr. Wolf:

Great River Energy (“Applicant”) submits the following recommended revisions to the Draft Route Permit for the Palisade 115 kV transmission project in Aitkin County (the “Project”) previously filed in the above-referenced docket. The following recommended revisions are consistent with Applicant’s comments concerning the draft route permits proposed for the Menahga Project (Docket No. 14-787) and Motley Project (Docket No. 15-204).

**Recommended Revisions**

**Section 5.2.** The Permittee shall notify landowners or their designee at least 14 days in advance but not greater than 60 days in advance of entering the property conducting construction activities on the property related to the Project.

*Reason for change:* Applicant proposes this change to avoid ambiguity and clarify that landowner notification is required before construction activities commence. Applicant may enter landowners’ property to conduct negotiations or provide notifications related to the Project and does not believe a 14-60 day notice requirement should be applied to these contacts.

**Section 5.3.15.** ~~The Permittee shall evaluate mitigate measures in areas of the project where the chance of avian collision or electrocution is higher. Areas shall be identified by the Permittee in cooperation with the Minnesota Department of Natural Resources where bird flight diverters will be incorporated into the transmission line design to prevent large avian collisions attributed to visibility issues. Standard transmission design shall incorporate~~

~~adequate spacing of conductors and grounding devices to eliminate the risk of electrocution to raptors with larger wingspans that may simultaneously come in contact with a conductor and grounding devices.~~ The Permittee's standard transmission design shall incorporate adequate spacing of conductors and grounding devices in accordance with Avian Power Line Interaction Committee standards to eliminate the risk of electrocution to raptors with larger wingspans that may simultaneously come in contact with a conductor and grounding devices. The Permittee will consult with the Minnesota Department of Natural Resources (DNR) regarding type and placement of bird diverters.

*Reason for change:* Applicant proposes this change to avoid ambiguity and promote consistency. The language proposed by Applicant is from the route permit issued for the Motley Project.

**Section 5.3.19.** The Permittee shall fairly restore or compensate landowners for damage to crops, fences, private roads and lanes . .

. .

*Reason for change:* Applicant proposes this change to provide flexibility to landowners and Applicant in resolving damages arising from construction of the Project. This revision was incorporated into the Route Permit for the Menahga Project.

**Section 8.4.** Within ~~60~~ 180 days after completion of construction, the Permittee shall submit copies of all final as-built plans and specifications developed during the Project.

*Reason for change:* Applicant suggests this change to be consistent with its comments concerning the route permit for the Menahga Project. In that proceeding, Applicant suggested that this provision be revised to allow 180 days to file as-built plans, but a 90-day requirement was placed in the permit. Applicant continues to believe that the appropriate timeframe is 180 days.

**Section 8.5.** Within ~~60~~ 180 days after completion of construction, the Permittee shall submit to the Commission, in the format requested by the Commission, geo-spatial information . . . .

*Reason for change:* While GPS data can sometimes be obtained within 60 days of Project completion, GPS and as-built plans and specifications are typically submitted jointly, and Applicant requests it be allowed to do so here. As noted above, Applicant continues to believe that the appropriate timeframe is 180 days.

### **Special Conditions**

In addition to the revisions above, consistent with agency recommendations and Great River Energy's proposed findings of fact and conclusions of law, Great River Energy recommends adding the following Special Conditions to the Route Permit:

**Section 5.5.3.** The Permittee shall coordinate with DNR regarding avian mitigation and vegetation management.

**Section 5.5.4.** The Permittee shall use wildlife-friendly erosion control near water crossings, Minnesota Biological Survey Sites of Biodiversity Significance, and areas with rare species susceptible to entanglement in erosion control mesh.

**Section 5.5.5.** The Permittee shall coordinate with USFWS regarding impacts to the NLEB.

### **Closing**

Applicant appreciates the opportunity to submit these comments on the Draft Route Permit. Should you have any questions, please contact me at (763) 445-5214. A copy of this filing is also being served upon the persons on the Official Service List of record.

Sincerely,

GREAT RIVER ENERGY

*Carole L. Schmidt*

Carole L. Schmidt  
Supervisor, Transmission Permitting and Compliance

**AFFIDAVIT OF SERVICE**

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**In the Matter of the Application of Great River  
Energy for a Route Permit for a 115 kV  
Transmission Project Near Palisade, Minnesota  
in Aitkin County**

**MPUC Docket No. ET2/TL-15-423; OAH Docket  
No. 5-2500-32920**

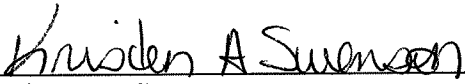
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STATE OF MINNESOTA    )  
  ) SS.  
COUNTY OF HENNEPIN    )


Kristen A. Swenson, of the City of Minneapolis, the County of Hennepin, State of Minnesota, being duly sworn on oath, deposes and states that on the 26th day of May, 2016, she e-filed with the Minnesota Public Utilities Commission the following:

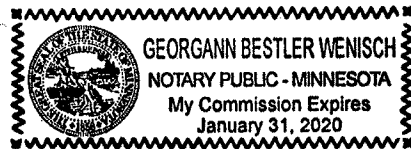
1. Great River Energy's Comments on the Draft Route Permit; and,
2. Affidavit of Service.

A copy has also been served in accordance with the attached service list of record.

  
\_\_\_\_\_  
Kristen A. Swenson

Subscribed and sworn to before me  
this 26th day of May, 2016

  
\_\_\_\_\_  
Notary Public



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_15-423_Official
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_15-423_Official
Patrice	Jensen	patrice.jensen@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd N  St. Paul, MN 55155	Electronic Service	No	OFF_SL_15-423_Official
Stacy	Kotch	Stacy.Kotch@state.mn.us	MINNESOTA DEPARTMENT OF TRANSPORTATION	395 John Ireland Blvd.  St. Paul, MN 55155	Electronic Service	No	OFF_SL_15-423_Official
Karen	Kromar	karen.kromar@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd  Saint Paul, MN 55155	Electronic Service	No	OFF_SL_15-423_Official
John	Lindell	agorud.ecf@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_15-423_Official
Carole	Schmidt	cschmidt@grenergy.com	Great River Energy	12300 Elm Creek Boulevard  Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_15-423_Official
Jamie	Schrenzel	jamie.schrenzel@state.mn.us	Minnesota Department of Natural Resources	500 Lafayette Road  Saint Paul, MN 55155	Electronic Service	No	OFF_SL_15-423_Official
Mark	Strohfus	mstrohfus@grenergy.com	Great River Energy	12300 Elm Creek Boulevard  Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_15-423_Official
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_15-423_Official