

September 20, 2022

*Via eDockets*

Consumer Affairs Office  
Minnesota Public Utilities Commission  
121 Seventh Place East, Suite 350  
St. Paul, MN 55101-2147

RE: Comments and Recommendations on Application Completeness  
GRE St. Joseph 115 kV Transmission Line and Substation Rebuild  
Docket No. ET2/TL 22-235

Dear Consumer Affairs Staff:

Energy Environmental Review and Analysis staff provide the attached comments and recommendations on application completeness for the route permit application filed August 26, 2022, by Great River Energy for the 115 kV Transmission Line and Substation Rebuild in St. Joseph, Minnesota.

Staff recommends the Commission accept the site permit application as complete but require the applicant to supplement the record with additional information in the form of an amended site permit. Staff further recommends the Commission take no action on an advisory task force. Staff recommends a full Administrative Law Judge (ALJ) report with recommendations. A full ALJ report reduces the burden on staff and helps to ensure that the Commission has a robust record on which to base its decision.

I am available to answer any questions the Commission might have.

Sincerely,

*/s/ Jamie MacAlister*

Jamie MacAlister, Environmental Review Manager  
Energy Environmental Review and Analysis

cc: Scot Ek, Public Utilities Commission  
Craig Janezich, Public Utilities Commission  
Bret Eknes, Public Utilities Commission  
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## BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

### ENERGY ENVIRONMENTAL REVIEW AND ANALYSIS COMMENTS AND RECOMMENDATIONS ON APPLICATION COMPLETENESS

Great River Energy St. Joseph 115 kV Transmission Line and Substation Rebuild Project  
*Docket No. ET2/TL 22-235*

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**Date:** September 20, 2022      **Staff:** Jamie MacAlister | [jamie.macalister@state.mn.us](mailto:jamie.macalister@state.mn.us) | 651-539-1775  
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**Issues Addressed:** These comments and recommendations address completeness of the site permit application, presence of contested issues of fact, and need for an advisory task force.

**Figures and Tables:** Figure 1 Project Location; Table 1 Proposed Schedule; Table 2 Application Completeness Checklist

Additional documents and information, including the route permit application, can be found on eDockets by searching “22” for year and “235” for number: <https://www.edockets.state.mn.us/EFiling/search.jsp> or the EERA project webpage: <https://mn.gov/eera/web/project/14925>.

This document can be made available in alternative formats, that is, large print or audio, by calling (651) 539-1530 (voice).

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On August 26, 2022, Great River Energy (GRE) filed a route permit application for the St. Joseph 115 kilovolt (kV) Transmission Line and Substation Upgrade project (project), located in Stearns County.<sup>1</sup> The Public Utilities Commission (Commission) issued a notice soliciting comments on the completeness of the application and other concerns on September 6, 2022.<sup>2</sup>

### Project Purpose

The project is being proposed to improve system reliability by completing the conversion of the regional transmission system to operate at 115-kV.<sup>3</sup> The upgrade of the transmission line will “loop” the system

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<sup>1</sup> Application for a Route Permit (August 25, 2022), eDocket ID: [20228-188608-02](#), [20228-188608-03](#), [20228-188608-04](#)

<sup>2</sup> Notice of Comment Period (Application Acceptance), eDocket ID: [20229-188841-01](#)

<sup>3</sup> Application, P. 1-5.

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by allowing power to the Westwood Substation to be provided either through the West St. Cloud Substation to the south or the Le Sauk Substation to the north.

## Project Description

GRE proposes to rebuild the existing 69-kV ST-WW transmission line system as a new 115-kV transmission line system and upgrade existing substations. Specifically, GRE proposes to:

- Remove approximately 3.2 miles of the existing 69-kV ST-WW transmission line and structures between the existing West St. Cloud, Westwood, and Le Sauk Substations and replace those facilities with an overhead 115-kV transmission line and structures.
- Extend the transmission line approximately 170 feet northwesterly near the existing Le Sauk Substation to tap into a new 115-kV switch on Great River Energy's existing STFPT (loosely the Stearns - Five Points Substation line) transmission line;
- Install an additional 115-kV breaker and associated equipment at the existing West St. Cloud Substation, which will require an approximately 6,500-square-foot expansion of the substation;
- Install two 115-kV line switches: one for the tap feeding the existing Westwood Substation and one north of the existing Le Sauk Substation.

The project is in St. Joseph Township, the City of St. Joseph, and St. Wendell Township, Minnesota (Figure 1). Single-pole wood structures with horizontal post insulators will be used for most of the transmission line. Typical pole heights will range from 70 to 90 feet above ground, and spans between poles will range from 300 to 400 feet.

## Regulatory Process and Procedures

The project requires a route permit from the Commission.<sup>4</sup> Because the project is a high voltage transmission line between 100 and 200 kilovolts, it qualifies for the alternative permitting process.<sup>5</sup> Applicants must provide the Commission with written notice of their intent to file an application under the alternative permitting process,<sup>6</sup> which was provided July 14, 2022.<sup>7</sup> A certificate of need (CN) is not required for this project.<sup>8</sup>

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<sup>4</sup> Minn. Stat. [216E.03](#), subd. 2 (no person may construct a high-voltage transmission line without a route permit from the Commission); Minn. Stat. [216E.01](#), Subd. 4 ("High-voltage transmission line" means a conductor of electric energy and associated facilities designed for and capable of operation at a nominal voltage of 100 kilovolts or more and is greater than 1,500 feet in length.).

<sup>5</sup> Minn. Stat. [216E.04](#), subd. 2(3).

<sup>6</sup> Minn. R. [7850.2800](#), subp. 2.

<sup>7</sup> St. Joseph Transmission Line and Substation, (July 14, 2022) *Notice of Application to File Under Alternative Process*, eDockets No. [20227-187430-01](#).

<sup>8</sup> Minn. Stat. [216B.243](#), subd. 2 (no "large energy facility" shall be constructed without issuance of a certificate of need); Minn. Stat. [216B.2421](#), subd. 2(2) ("large energy facility" means: (2) any high-voltage transmission line with a capacity of 100 kilovolts or more with more than ten miles of its length in Minnesota or that crosses a state line).

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## Route Permit Application and Acceptance

Route permit applications must provide specific information.<sup>9</sup> This includes, but is not limited to, information about the applicant, descriptions of the project and route, and discussion of potential human and environmental impacts and possible mitigation measures.<sup>10</sup> Under the alternative permitting process an applicant is not required to propose alternative sites; however, if alternative sites were evaluated and rejected, the application must describe these sites and reasons for rejecting them.<sup>11</sup>

Upon receiving a site permit application, the Commission may accept it as complete, reject it and advise the applicant of its deficiencies, or accept it as complete but require the applicant submit additional information.<sup>12</sup> If the Commission determines the application is complete, the environmental review and permitting process moves forward.

The Commission is required to make a permit decision within six months from the date an application is accepted.<sup>13</sup> This time limit may be extended up to three months for just cause or upon agreement of the applicant.<sup>14</sup>

## Public Advisor

Upon acceptance of a route permit application the Commission must designate a public advisor.<sup>15</sup> The public advisor answers questions about the permitting process but cannot provide legal advice or act as an advocate for any person.

## Advisory Task Force

The Commission may appoint an advisory task force to aid in the environmental review process.<sup>16</sup> An advisory task force would assist Energy Environmental Review and Analysis (EERA) staff in identifying additional sites or particular impacts to evaluate in the environmental assessment (EA) prepared for the project.<sup>17</sup> If appointed, an advisory task force must include certain local government representatives.<sup>18</sup> The advisory task force expires upon completion of its charge or issuance of the scoping decision.<sup>19</sup>

Appointment of an advisory task force is not required. In the event no advisory task force is appointed, citizens may request one be created.<sup>20</sup> If such a request is made, the Commission must make this determination at its next scheduled agenda meeting.<sup>21</sup>

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<sup>9</sup> Minn. Stat. [216E.04](#), subd. 3; Minn. R. [7850.3100](#).

<sup>10</sup> *Ibid.*

<sup>11</sup> *Ibid.*

<sup>12</sup> Minn. R. [7850.3200](#).

<sup>13</sup> Minn. R. [7850.3900](#), subp. 1.

<sup>14</sup> *Ibid.*; see *infra* note 33 (the Commission has 12 months to approve or deny a CN application).

<sup>15</sup> Minn. R. [7850.3400](#).

<sup>16</sup> Minn. Stat. [216E.08](#), subd. 1; Minn. R. [7850.3600](#), subp. 1.

<sup>17</sup> Minn. R. [7850.2400](#), subp. 3.

<sup>18</sup> Minn. Stat. [216E.08](#), subd. 1.

<sup>19</sup> Minn. R. [7850.2400](#), subp. 4.

<sup>20</sup> Minn. R. [7850.2400](#), at subp. 2.

<sup>21</sup> *Ibid.*

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The decision whether to appoint an advisory task force does not need to be made at this time; however, a decision should be made as soon as practicable to ensure an advisory task force could complete its charge prior to issuance of the scoping decision.

### Environmental Review

An EA is required for the alternative permitting process and is prepared by EERA staff.<sup>22</sup> An EA contains an overview of the resources affected by the project and discusses potential human and environmental impacts and mitigation measures.<sup>23</sup> Under the alternative permitting process an EA is the only required state environmental review document.

EERA conducts public scoping meetings in conjunction with a public comment period to inform the content of the EA.<sup>24</sup> The Commissioner of the Department of Commerce (or designee) determines the scope of the EA,<sup>25</sup> and may include alternative sites suggested during the scoping process if they would aid the Commission in making a permit decision.<sup>26</sup>

### Public Hearing

The alternative permitting process requires a public hearing be held in the project area upon completion of the EA<sup>27</sup> in accordance with the procedures outlined in Minnesota Rule [7850.3800](#), subpart 3.

The hearing is typically presided over by an administrative law judge (“ALJ”) from the Office of Administrative Hearings (“OAH”). The Commission may request the ALJ provide a summary of the hearing or request the ALJ provide a full report with findings of fact, conclusions of law, and recommendations regarding the site permit application. This hearing is not a contested case hearing and is not conducted under OAH Rule [1405](#).

Requesting the ALJ to prepare a full report with findings, conclusions of law, and recommendations may extend the length of the permitting process. However, a full ALJ report reduces the burden on staff and helps to ensure that the Commission has a robust record on which to base its decision. **Table 1** provides a proposed schedule of the permitting process.

### Staff Comments

EERA provides technical expertise and assistance to the Commission.<sup>28</sup> EERA and the Commission work cooperatively, but function independently to meet their respective statutory responsibilities.

### Application Completeness

Staff evaluated the application against the completeness requirements of Minnesota Rule [7850.3100](#) (**Table 2**). The application contains information with respect to these requirements, including descriptions of the project, potential human and environmental impacts, and mitigation measures.

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<sup>22</sup> Minn. Stat. [216E.04](#), subd. 5; Minn. R. [7850.3700](#), subp. 1.

<sup>23</sup> Minn. Stat. [216E.04](#), subd. 5; Minn. R. [7850.3700](#), subp. 4.

<sup>24</sup> Minn. R. [7850.3700](#), subp. 2.

<sup>25</sup> *Id.* at subp. 3.

<sup>26</sup> *Id.* at subp. 2.

<sup>27</sup> Minn. R. [7850.3800](#), subp. 1.

<sup>28</sup> Minn. Stat. [216E.03](#), subd. 11.

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Based on completeness criteria, the application is complete. However, staff note several areas of the application that warrant additional information.

The application submitted by GRE provides a preliminary alignment, right-of-way, and varying route widths. The application, however, indicates that GRE plans to address other key project features such as project design and stakeholder engagement after environmental review is complete and a permit has been issued. These include preliminary pole placements and pole types, span widths, and the need for additional right-of-way (ROW). Because this is a fairly straightforward project (the length of the project is relatively short, the applicant owns the existing transmission line and ROW, the substations are existing, and there is a preferred route that follows the existing ROW), EERA believes it should be possible to better define these key project features. This information, even if preliminary, would enhance the public and stakeholders' understanding of the project.

While staff believe environmental review can and should accommodate a certain level of flexibility at the application stage, the lack of detail pertaining to preliminary pole placement, acquisition of additional land rights, and the applicant's preference to design the project and conduct stakeholder engagement after a route permit issued, raises concerns, particularly around stakeholder engagement.<sup>29</sup>

EERA believes that a well-developed project and early coordination with landowners, local units of government, state and federal agencies, and Tribal Nations is an essential part of permitting and environmental review. When projects are designed after a permit is issued, there is a greater likelihood of delay and potentially unforeseen consequences that must suddenly be addressed after the permit is issued and environmental review complete.

EERA believes further information in the following areas would facilitate a smooth process and development of a robust record:

#### *Preliminary Pole Placement and Visual Simulations*

The application lacks maps showing preliminary pole placement. There are also no visual simulations of the area that would allow adjacent landowners and stakeholders to visualize the proposed changes. Inclusion of these visuals allows stakeholders and adjacent landowners to see the changes in pole height and spacing associated with upgrading the transmission line and explain why varying route widths are needed. The City of St. Cloud submitted comments regarding anticipated roadway projects.<sup>30</sup> Preliminary pole placement could address the city's request or identify areas where GRE and the City of St. Cloud have unresolved issues.

#### *Distribution Lines*

The current 69 kV line and structures are underbuilt with distribution lines in some areas. GRE understands that owners of these lines plan to bury them rather than use the new 115 kV structures.<sup>31</sup> The application does not provide any additional information regarding timing or how the two projects will be uncoupled. EERA believes that additional information regarding the removal of distribution lines and potential ROW conflicts be addressed prior to scoping.

#### *Agency Coordination*

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<sup>29</sup> Application, P. 1-1

<sup>30</sup> Comment Letter, City of St. Cloud (September 8, 2022), eDockets No. [20229-188984-01](#).

<sup>31</sup> Application, P. 4-6.

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EERA believes that early coordination with Tribal Nations, local units of government, state and federal agencies, and stakeholders should occur before an application is submitted, ensuring that potential issues are identified early and can be resolved (as much as possible) before a permit is issued. A lack of coordination, or poorly timed coordination (after a permit is issued), makes issue resolution more difficult and does not support good faith efforts to engage with stakeholders and governmental entities. Furthermore, staff believe that early coordination and issue identification early in the process sets the stage for success during permitting and environmental review.

#### MDNR

GRE completed a desktop review of MDNR's Natural Heritage Information System (NHIS) records. However, correspondence with MDNR indicates that the information obtained through the desktop review is considered a draft submission for planning purposes only and not valid for other uses. The query specifically states, "This document does not meet the requirements of a Natural Heritage Review and may NOT be used to meet the requirements for permitting, licensing, formal environmental review, etc. This document is based on draft project details and is for planning purposes within your organization only."<sup>32</sup> Early coordination with MDNR is necessary to identify and avoid potential impacts.

#### MNDOT

The application does not provide coordination letters with MnDOT. Coordination with MnDOT and local roadway permitting authorities helps identify and avoid potential impacts in roadway rights-of-way and clarifies potential permitting constraints associated with roadway rights-of-way.

#### City of St. Cloud

The City of St. Cloud submitted a comment letter on September 12, 2022.<sup>33</sup> The letter expresses support for the current alignment proposed by GRE and includes the following requests:

- The City of St. Cloud supports the current design proposal for the alignment to remain west of 73rd Avenue North so as not to impact existing residential development east of the corridor within the city limits.
- The City of St. Cloud requests the alignment account for the future widening of 73rd Avenue North and its potential future extension south of Westwood Parkway. The adopted St. Cloud Comprehensive Plan designates Westwood Parkway and County Road 134 as Minor Collector roadways which should be connected by 73rd Avenue North in similar design and capacity. The City of St. Cloud's Land Development Code requires a 100 foot right of way for Minor Collector roadways. 73rd Avenue North currently exists within a 66 foot right of way. The transmission line design and alignment should account for a westerly right of way expansion from 66 feet to 100 feet so as to avoid purchase and/or condemnation of easements on existing residential parcels east of the corridor.
- The City of St. Cloud Comprehensive Plan and the recently adopted Southwest Beltline Corridor Study both consider the western extension of Westwood Parkway to connect

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<sup>32</sup> Application, Appendix E (Correspondence with Agencies and Tribes).

<sup>33</sup> Comment Letter, City of St. Cloud (September 12, 2022), eDocket No. [20229-188984-01](#).

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with the future southwest beltway. While the western terminus of said corridor is uncertain, the eastern terminus will be the intersection of Westwood Parkway and 73rd Avenue North. The placement of above and below ground improvements for the transmission line should account for a 120 foot right of way to extend Westwood Parkway.

The application does not include correspondence with the City of St. Cloud, nor does it include any reference to these concerns in the application. It is unclear if MnDOT is working with the city on the corridor studies referenced in their comment letter. Additional information would be useful in understanding potential cumulative impacts of the project.

#### *Prairie Restoration Project along the ROW*

The ROW for the transmission line on Mullen Rd. is within a restored prairie designated as pollinator habitat on private land. The application does not mention this parcel, the pollinator habitat, or how GRE will avoid impacts in this area.

#### *Climate Change and Resiliency*

GRE provides information on greenhouse gas emissions associated with the project and is assessing risks of climate change on reliability of its system.<sup>34</sup> The application does not provide information on climate adaptation measures, steps GRE is taking to build resiliency into the system, or what those steps would be for this project.

#### *Route Widths and ROWs*

GRE proposes varying route widths for the project.<sup>35</sup> Specifically, GRE proposes varying route widths for the following segments of the route:

- The entire parcel upon which the expanded West St. Cloud Substation is proposed to be located.
- Along the south side of Ridgewood Road, a 100-foot-wide<sup>5</sup> route extending southerly and perpendicular from the road ROW.
- An approximately 2.75-acre area around the existing Westwood Substation to enable design and construction options for the Project to cross over Ridgewood Road and railroad tracks, under the existing Xcel Energy 115-kV transmission line, over 304th Street, and to accommodate redesign options at the Westwood Substation.
- Along the north side of 304th Street, a 100-foot-wide<sup>7</sup> route width extending northerly and perpendicular from the road ROW.
- Along the north-to-south parcel/section lines, a 100-foot-wide route extending westerly and perpendicular from the north-to-south parcel/section lines.
- Along the easterly-to-westerly Mullen Road, a 220-foot-wide route that extends 110 feet perpendicular from each side of the road centerline.

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<sup>34</sup> Application, P. 7-22-23.

<sup>35</sup> Application, P. 1-6-7.

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- Along the final 115-kV transmission line segment connected to the new switch on Great River Energy’s existing ST-FPT 115-kV transmission line, a 200-foot-wide route width that extends perpendicular from the proposed transmission line centerline.

While GRE holds easements for the existing 69-kV line, they propose to “evaluate what additional land rights will be needed for the Project after final design is completed.”<sup>36</sup> GRE holds easements for the existing transmission line and plans to evaluate what additional land rights will be needed for the project after the route permit has been issued.<sup>37</sup> The application indicates GRE anticipates additional land rights and easement needs will depend on a variety of factors. The application, however, does not discuss the various factors. Further discussion of the factors would provide better insight for landowners and other stakeholders.

### *Advisory Task Force*

Staff considers four characteristics when analyzing the merits of establishing an advisory task force: size, complexity, presence of sensitive natural resources, and known or anticipated controversy. Generally, large, complex projects that impact sensitive resources or are controversial may warrant an advisory task force. Staff used the information and preliminary environmental data contained in the application to complete this evaluation.

### *Project Size*

The HVTL is approximately 3.2 miles long—a relatively short distance. Structures will be 70 to 90 feet tall and 300 to 800 feet apart depending on structure type. These heights and distances are similar to other transmission line structures throughout the region and Minnesota. The existing substations are not large and appear to require minimal changes to accommodate the line upgrades.

### *Complexity*

The project itself not complicated. GRE has an existing 69 kV line and ROW where the proposed project will be located, the substations need minimal changes for the line upgrades, and the terrain is flat. There are areas of congestion on the southern end of the project, where a mix of land-uses (residential, commercial, and industrial) converge. This area also includes roadways, a rail line, and the Lake Wobegon trail.

### *Sensitive Resources*

Potential impacts to sensitive natural resources are anticipated to be minimal. This is due in large part to the project following existing right-of-way. There is an area of restored prairie at the northern end of the project that may be impacted. The application does not address this area

### *Known or Anticipated Controversy*

Staff is unaware of controversies regarding the project. The City of St. Cloud submitted a letter noting areas of planned roadway expansion. There may be areas of potential rights-of-way conflict in the congested area of the project area. Identifying pole placements and coordination with the City of St. Cloud will help identify any potential land-use conflicts.

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<sup>36</sup> Id.

<sup>37</sup> Application, P. 1-1.

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Based on the assessment of the factors above, staff believe an advisory task force is not necessary.

## Recommendations

Staff recommend the Commission accept the site permit application as complete upon receiving the information below:

1. Require the applicant to identify preliminary pole placements within the ROW and visual simulations of the project.
2. Require the applicant to explain land rights and easements and any potential conflicts with other planned infrastructure projects, specifically those identified by the City of St. Cloud.
3. Require the applicant to coordinate with MnDOT on potential impacts of the project on proposed transportation projects and road rights-of-way.
4. Require the applicant to coordinate with MDNR regarding potential impacts of the project on natural resources and timing of submission of the DNR Natural Heritage Information System review.
5. Require the applicant to coordinate with the City of St. Cloud regarding pole placement, substation expansion, and right-of-way concerns.
6. Require the applicant to provide additional discussion of the existing pipeline in the area, potential impacts, avoidance, and mitigation.
7. Require the applicant to update the Minn. R. 7850.1900, subp. 3 language in their completeness checklist for accuracy.
8. Require the applicant to provide information on climate adaptation and resiliency for the proposed project.
9. Require the applicant to provide additional information as needed to prepare the EA, such as describing dead end structures, including the height range for the vegetation removal clear zone, and referencing which equations were used to calculate greenhouse gas emissions.
10. Require the applicant submit an amended application addressing items 1-9.
11. Staff further recommends the Commission take no action on an advisory task force.



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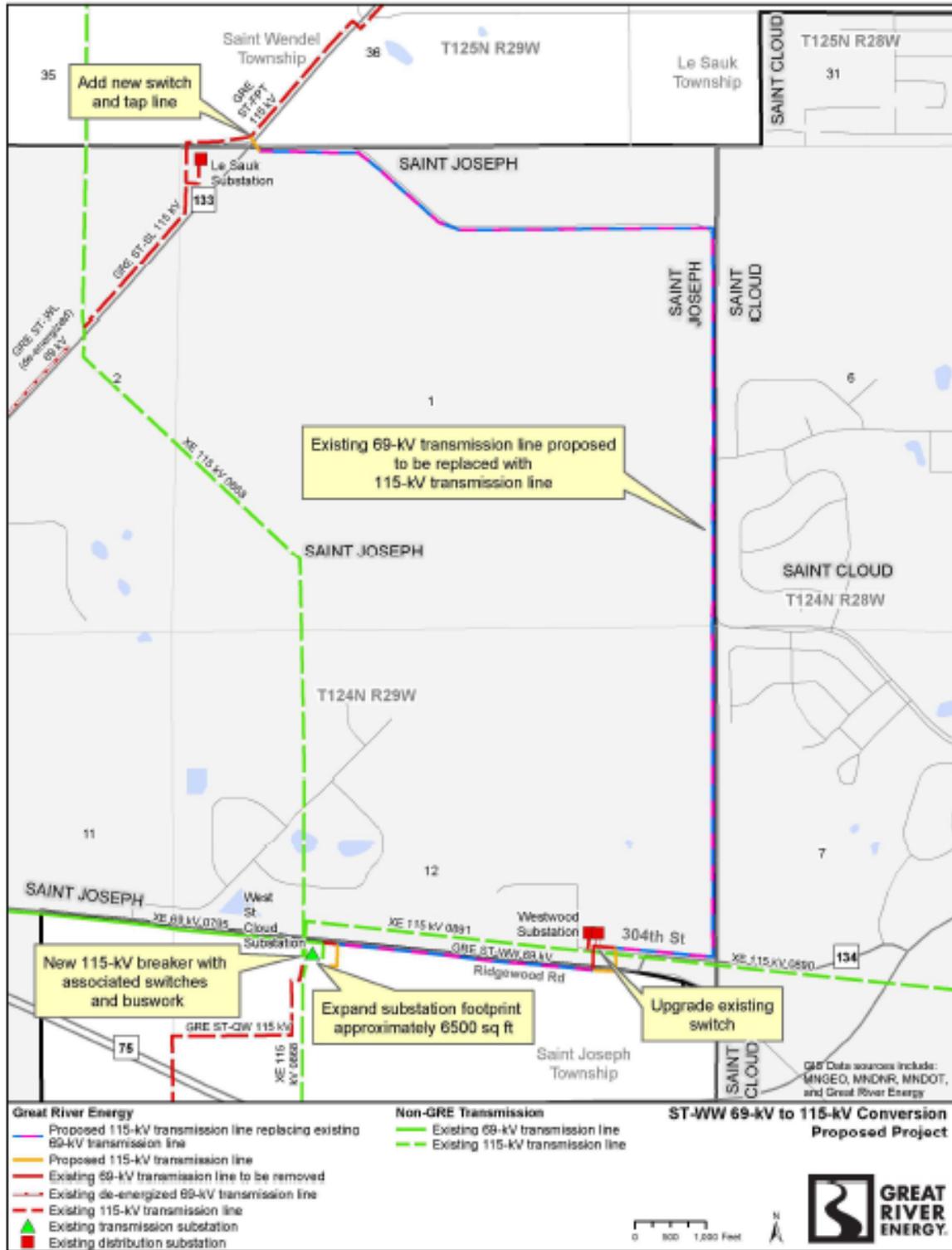
Jamie MacAlister, Environmental Review Manager  
Energy Environmental Review and Analysis  
Department of Commerce

September 20, 2022

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Date

Figure 1 Proposed Project



**Table 1 Permitting and Environmental Review Schedule**

<b>Project Day</b>	<b>Process Step</b>	<b>Responsible Party</b>
<b>Application Consideration</b>		
0	10-day Notice of intent to file	Applicant
	Application Filed	Applicant
	Notice of Application Completeness and Comment Period	Commission
	Reply Comments	various
	Consideration of Application	Commission
<b>Application Acceptance and Environmental Review</b>		
1	Application Acceptance Order	Commission
	Public/Scoping Meeting Notice	EERA/Commission
30	Public Information/Scoping Meeting	EERA/Commission
45	Scoping Comment Period Closes	EERA
60	Scoping Summary to Commission	EERA
85	Commission Review of Alternatives	Commission
95	Scoping Decision Issued	Commerce
185	Environmental Assessment Issued	EERA
	Public Hearing Notice	Commission
<b>ALJ Report</b>		
200	Public Hearing	OAH
215	Comment Period Closes	OAH
220	ALJ Submits Transcript and Comments	OAH
225	Draft Findings of Fact (FOF)	Applicant
240	Comments on Draft FOF/Technical Analysis	EERA
	Response to Hearing Comments	Applicant
270	ALJ Issues FOF and Recommendation	OAH
285	Exceptions to ALJ Report	EERA/Applicant
315	Route Permit Issuance	Commission

## Table 2 Application Completeness Checklist

Staff comments regarding application requirements are provided in the following checklist.

Minnesota Rule 7850.3100. Contents of Application The applicant shall include in the application the same information required in part 7850.1900, except the applicant need not propose any alternative . . . routes to the preferred . . . route. If the applicant has rejected alternative . . . routes, the applicant shall include in the application the identity of the rejected . . . routes and an explanation of the reasons for rejecting them.

Minnesota Rule 7850.1900, subpart 2 Route permit for HVTL. An application for a route permit for a high voltage transmission line shall contain the following information:

7850.1900, subp. 2	Section(s)	Comments
A. a statement of proposed ownership of the facility at the time of filing the application and after commercial operation;	3.1	Great River Energy will own and operate the HVTL.
B. the precise name of any person or organization to be initially named as permittee or permittees and the name of any other person to whom the permit may be transferred if transfer of the permit is contemplated;	3.1	Great River Energy is the permittee. A company contact information is provided.
C. at least two proposed routes for the proposed high voltage transmission line and identification of the applicant's preferred route and the reasons for the preference;	Chapter 5.1	Proposing two routes is not required under the alternative process; however, the application does address a route considered but rejected by the applicant.
D. a description of the proposed high voltage transmission line and all associated facilities including the size and type of the high voltage transmission line;	4.1. 4.2	Sections 4.1 and 4.2 describe the proposed project (an upgrade of the 169 kV line to 115 kV), and expansion of the existing substations.
E. the environmental information required under subpart 3.	<b>See Minn. R. 7850.1900, subpart 3 below.</b>	

7850.1900, subp. 2	Section(s)	Comments
F. identification of land uses and environmental conditions along the proposed routes;	Chapter 7	Section 7.1 discusses the environmental setting generally, but there are notable omissions (e.g. the private parcel that has been restored to native prairie and pollinator habitat).
G. the names of each owner whose property is within any of the proposed routes for the high voltage transmission line;	Appendix C	A list of landowners within the proposed route is provided.
H. United States Geological Survey topographical maps or other maps acceptable to the commission showing the entire length of the high voltage transmission line on all proposed routes;	Figure 1-1 Figure 1-2 Appendix B	Multiple maps are provided, including a project overview map and detailed route maps. The applicant made some revisions to maps, but many are still difficult to interpret.
I. identification of existing utility and public rights-of-way along or parallel to the proposed routes that have the potential to share the right-of-way with the proposed line;	6.3	Information about existing utility and public rights-of-way is provided. The project will be located in the existing GRE ROW. GRE has requested varying route widths for the route. It is unclear if the request is necessary to accommodate the new structures or for other reasons. The application does not identify or address any potential conflicts within the requested ROW widths with other planned uses.
J. the engineering and operational design concepts for the proposed high voltage transmission line, including information on the electric and magnetic fields of the transmission line;	4.2, 6.8	General design concepts and information pertaining to electric and magnetic fields is provided.
K. cost analysis of each route, including the costs of constructing, operating, and maintaining the high voltage transmission line that are dependent on design and route;	4.3, 6.7	Cost information is provided.
L. a description of possible design options to accommodate expansion of the high voltage transmission line in the future;	6.2	Information about future expansion is provided.

7850.1900, subp. 2	Section(s)	Comments
M. the procedures and practices proposed for the acquisition and restoration of the right-of-way, construction, and maintenance of the high voltage transmission line;	6.4, 6.5, 6.6; 6.7	Information is provided about construction, restoration, and maintenance practices. GRE plans to evaluate the need for additional ROW and easements after receiving a permit.
N. a listing and brief description of federal, state, and local permits that may be required for the proposed high voltage transmission line; and	2.4 Table 2-1	Potentially applicable permits from local, state, and federal jurisdictions are listed, along with brief descriptions.
O. a copy of the Certificate of Need or the certified HVTL list containing the proposed high voltage transmission line or documentation that an application for a Certificate of Need has been submitted or is not required.	2.5	The application states that the project does not require a certificate of need from the commission.

Minnesota Rule 7850.1900, subpart 3. Environmental Information An applicant for ... a route permit shall include in the application the following environmental information for each proposed ... route to aid in the preparation of an environmental impact statement:

7850.1900, subp. 3	Section(s)	Comments
A. a description of the environmental setting for each . . . route;	7.1	The environmental setting is generally described but lacks detail.
B. a description of the effects of construction and operation of the facility on human settlement, including, but not limited to, public health and safety, displacement, noise, aesthetics, socioeconomic impacts, cultural values, recreation, and public services;	7.2	Effects to human settlement, including the listed criteria, are described. GRE provides an environmental justice analysis (7.2.5). Information regarding public services and transportation does not address concerns raised by the City of St. Cloud and no coordination with MnDOT is discussed. GRE notes that a license to cross the BNSF rail line is needed but provides no discussion of this in section 7.2.8. Neither section 7.2 nor 7.3 provides information regarding the St. Cloud Comprehensive Plan or potential land use/ROW conflicts in an area with agricultural, industry, and residential land uses adjacent to the proposed project.

7850.1900, subp. 3	Section(s)	Comments
C. a description of the effects of the facility on land-based economies, including, but not limited to, agriculture, forestry, tourism, and mining;	7.4	Effects to land based economies, including the listed criteria, are described.
D. a description of the effects of the facility on archaeological and historic resources;	7.5	Effects to archaeological and historic resources are described; a cultural resource literature review was conducted. The applicants coordinated with the State Historic Preservation Office.
E. a description of the effects of the facility on the natural environment, including effects on air and water quality resources and flora and fauna;	7.6, 7.7	Effects to the natural environment, including the listed criteria, are described. Section 7.3 briefly discusses land cover. Section 7.7 discusses topography, geology, etc.
F. a description of the effects of the facility on rare and unique natural resources;	7.8	Effects to rare and unique resources are described. The Natural Heritage Information System was queried. The applicants contacted the Department of Natural Resources and U.S. Fish and Wildlife Service. Additional coordination with MDNR is needed.
G. identification of human and natural environmental effects that cannot be avoided if the facility is approved at a specific . . . route; and	7.10	Unavoidable impacts are discussed.
H. a description of measures that might be implemented to mitigate the potential human and environmental impacts identified in items A to G and the estimated costs of such mitigative measures.	4.3; Chapter 7	Mitigative measures are described to the extent that impacts have been accurately identified. There are potential impacts not described in the application, therefore mitigation of those potential impacts is not described.