ATC COMMENTS TO ENVIRONMENTAL ANALYSIS (EA)

p. #	EA Statement	ATC Comment
Chapter 1: Summary		
p. 8	The EA states that environmental effects on several aspects of human settlement are anticipated to be "minimal," including operational noise and cultural values.	ATC notes that this statement with respect to cultural values is inconsistent with later analysis in the EA, which determined that the impact on cultural values if MP's proposal is selected will be "moderate," while the impact on cultural values of the ATC Alternative[1] would be "minimal." *See* EA at p. 37. With respect to noise, ATC notes that MP has not completed a full noise study, and will not do so until the final project configuration is known.
Chapter 4: Potential Impacts and Mitigation Measures		
p. 46	(Noise) The EA states that MP stated at the in-person public meeting that it would undertake a noise study on the proposed converter station and will take noise impacts into account during detailed design.	MP has undertaken only a cursory noise study that consists solely of drawing a 50dBA line around project features. *See* Rebuttal Testimony of David McCourtney at Schedule 4. MP stated at the public hearing that it will not perform a more in-depth noise study until the final project configuration is known.

[1] In its filings in this matter, ATC has used the term "Arrowhead Substation Alternative" to refer to the alternative it has proposed. The EA uses the term "ATC Alternative" for ATC's proposed alternative. In order to be consistent with the EA's language, ATC uses the term "ATC Alternative" to refer to the Arrowhead Substation Alternative in these comments.

Chapter 4: Potential Impacts and Mitigation Measures (Continued)		
p. 57	(Socioeconomics) The EA notes that MP has applied for and continues to pursue both state and federal funding for the project, but at this time, neither funding sources have been secured.	In response to MP's claims that the Commission's selection of the ATC Alternative could put federal funding from the United States Department of Energy's (DOE) Grid Resilience and Innovation Partnerships (GRIP) program at risk, ATC sought clarification from DOE as to whether applicants such as MP could modify the project scope between submission of a concept paper and final application, or after submission of a final application. Generally, DOE's response indicates that projects can be modified between the submission of a concept paper and full application. *See* "Questions and Answers Posted to Exchange" Nos. 241, 243 (copy attached).[2]
pp. 88-89	(Surface Waters) The EA discusses impacts to West Rocky Run Creek associated with both alternatives and notes that "the ROW for the proposed project will regrow over time, whereas the ROW will remain cleared near the ATC Alternative's new crossing, which could exacerbate warming impacts."	The Direct Testimony of Amy Lee indicates that "where practicable, a buffer of low-growing vegetation could be left adjacent to the waterway to provide shade in support of the trout population in the creek." *See* Direct Testimony of Amy Lee at 9. This buffer could help mitigate warming impacts to the stream.
p. 90	(Surface Waters) The EA states that ATC would be required to submit a draft vegetation management plan (VMP) prior to construction of the crossing of West Rocky Run Creek.	Although ATC has proposed the ATC Alternative, it is anticipated that MP would conduct the construction of the transmission line crossing West Rocky Run Creek. Therefore, MP would be responsible for submitting the VMP, regardless of the alternative selected by the Commission.

[2] A copy of the DOE's responses to various questions that have been submitted related to the GRIP program is publicly available on the DOE's Clean Energy Infrastructure Funding Opportunity Exchange. *See* DOE: Office of the Under Secretary for Infrastructure, *Clean Energy Infrastructure Funding Opportunity Exchange* (last visited Mar. 28, 2024), *available at* https://tinyurl.com/2zv4z5ev (reference FOA number DE-FOA-0003195). The Clean Energy Infrastructure Exchange system is used by various DOE program offices to post funding opportunity announcements (FOAs) to the public, including question and answer documents concerning those FOAs.

Chapter 5: Potential Impacts and Mitigation that Vary Between Routing Options		
pp. 114, 117 (Table 22)	(Wetlands) The EA states that permanent wetland impacts are expected to be 7.04 acres for MP's proposed project and 6.6 acres for the ATC Alternative. The EA also states that potential impacts to wetlands are anticipated to be slightly greater for the ATC Alternative than the proposed project.	ATC contends that the earlier statement on p. 114, as well as Table 22 on p. 117, show that the wetland impacts associated with the ATC Alternative are lesser than those associated with MP's proposed project, and believes that the word "greater" on p. 114 should be changed to "lesser."
p. 120	(Wetlands) The EA states that ATC has committed to certain measures to minimize impacts to wetlands during construction.	Although ATC has proposed the ATC Alternative, it anticipates that MP would be responsible for the construction of this alternative, except for work done within the fenceline of ATC's Arrowhead Substation. Therefore MP would be responsible for implementing any mitigation measures, regardless of the alternative selected by the Commission.
Chapter 6: Routing Factors		
pp. 125-127	Table 23 indicates that the cost of MP's proposal will be $55 million, and that the cost of the ATC Alternative will range from $51 million to $85 million.	Table 23 overstates the cost of the ATC Alternative. As set forth in the revised Rebuttal Testimony of Dustin Johanek at Table 3, as set forth in correspondence dated March 20, 2024 (Document ID 20243-204506-02), the ATC Alternative is expected to cost $38.2 million to $51.6 million.
p. 128	The EA states that the cost of the ATC Alternative could be lower, depending on whether another phase-shifting transformer is needed, and that the cost of the ATC Alternative could range from $51 million to $85 million, depending on whether a phase-shifting transformer is needed.	As noted above and in the corrected Rebuttal Testimony of Dustin Johanek at Table 3, as set forth in correspondence dated March 20, 2024 (Document ID 20243-204506-02), the ATC Alternative is expected to cost $38.2 million to $51.6 million. Additionally, ATC witness Thomas Dagenais confirms that a new phase-shifting transformer will not be required as part of the ATC Alternative. *See* Rebuttal Testimony of Thomas Dagenais at 50.