

## Staff Briefing Papers

**Meeting Date**    May 9, 2024

**Agenda Item \*2**

**Company**            Great River Energy

**Docket No.**        ET2/TL-23-170

**In the Matter of the Application of Great River Energy for a Route Permit for the  
115-kV Cedar Lake Transmission Line Reroute Project in Scott and Rice Counties**

- Issues**
1. Should the Commission adopt the administrative law judge's Findings of Fact, Conclusions of Law, and Recommendation?
  2. Should the Commission find that the environmental assessment and the record created at the public hearing adequately address the issues identified in the scoping decision?
  3. Should the Commission issue a route permit identifying a specific route and permit conditions for the 115-kV Cedar Lake Transmission Line Reroute Project?

**Staff**                Craig Janezich            craig.janezich@state.mn.us            651-201-2203

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The attached materials are work papers of the Commission Staff. They are intended for use by the Public Utilities Commission and are based upon information already in the record unless noted otherwise.

✓ **Relevant Documents**

	<b>Date</b>
GRE – Initial Filing – Reroute Application (10 parts)	06/06/2023
PUC – Order	07/05/2023
PUC – Order	10/26/2023
DOC EERA – Scoping Decision	11/16/2023
DOC EERA – EA (9 parts)	12/28/2023
GRE – Testimony – Direct Testimony of M. Strohfus	01/10/2024
GRE – Comments and Proposed Findings of Fact (3 parts)	02/16/2024
DOC EERA – Proposed Findings of Fact and Draft Route Permit	02/27/2024
OAH – Findings of Fact, Conclusions of Law, and Recommendations	03/29/2024
DOC EERA –Exceptions	04/12/2024
GRE –Exceptions to ALJ Report	04/15/2024
GRE – Other – LTE RE Filing Revised Route Permit	04/26/2024

## **PROJECT DESCRIPTION**

On June 6, 2023, Great River Energy (GRE) applied for a route permit to construct the Cedar Lake Reroute Project (Project). The Project is approximately 6.3 miles of new 115-kilovolt (kV) high voltage transmission line (HVTL) that begins at the Cedar Lake Substation and connects to the existing MV-EVX 115-kV transmission line near the intersection of 280<sup>th</sup> St E/State Highway 19 and Panama Avenue/County 23 in Cedar Lake Township. The project is a reroute of approximately 4.5 miles of existing 115-kV transmission line.

The existing transmission line is located on structures built for the CapX2020 Brookings County—Hampton 345-kV project. To make room for the second 345-kV circuit on the existing CapX2020 structures, the 115-kV transmission line using the CapX2020 structures must be decommissioned and relocated. To accomplish this, GRE must first construct the new line to supply power to Cedar Lake Substation before the existing transmission line can be decommissioned.

The 115-kV transmission line using the existing Capx2020 structures must be removed by September 2025 per GRE's contractual agreement. As a result, GRE anticipates construction in the fall of 2024 and energizes the line in the summer of 2025.

## **STATUTES AND RULES**

### Route Permit

Minn. Stat. § 216E.03, subd. 2, provides that no high-voltage transmission line shall be constructed in Minnesota without the issuance of a route permit by the Commission.

Under Minn. Stat. § 216E.01 subd., 4, a high-voltage transmission line is defined as a conductor of electric energy and associated facilities designed for and capable of operation at a nominal voltage of 100 kilovolts or more and that is greater than 1,500 feet in length. The proposed project is a new 6.3-mile 115-kilovolt transmission line and, therefore, requires a route permit from the commission.

The proposed project qualified for alternative review under Minn. Stat. 216E.04 because it is a high-voltage transmission line between 100 and 200-kV. Under the alternative permitting process: (1) the applicant is not required to propose alternative routes in its application but must identify other routes it examined and discuss the reasons for rejecting those routes; (2) an environmental assessment is prepared instead of an environmental impact statement; (3) a public hearing is conducted, but a contested case hearing is not required.

The proposed project is subject to Minn. Stat. § 216E, which requires that high-voltage transmission lines be routed in a manner consistent with the state's goals to conserve resources, minimize adverse human and environmental impacts, and other land use conflicts, and ensure the state's electric energy security and reliability through efficient, cost-effective power supply and electric transmission infrastructure. The statute also allows the Commission to specify the design, route, right-of-way preparation, facility construction, and any other

necessary conditions when issuing a high-voltage transmission line permit. The operative rules for the review of high-voltage transmission line route permit applications under alternative review are found in Minnesota Rules Chapter 7850.2800 to 7850.3900.

#### Environmental Assessment

Minn. Stat. § 216E.04, subd. 5, requires the Commissioner of the Department of Commerce to prepare an environmental assessment for the Commission on proposed high-voltage transmission lines being reviewed under the alternative permitting process. The environmental assessment must contain information on a proposed project's potential human and environmental impacts and alternative routes considered and address mitigation measures for identified impacts.

#### Certificate of Need

Minn. Stat. § 216E.243, subd. 2, provides that no large energy facility shall be cited or constructed in Minnesota without the Commission's issuance of a certificate of need. The proposed high-voltage transmission line is not defined as a large energy facility under Minn. Stat. 216B.2421, subd. 2 (3), because it is less than 10 miles in length and does not cross a state border. Therefore, a certificate of need is not required.

### **PROCEDURAL HISTORY**

On June 6, 2023, GRE filed an application for a route permit for the reroute of an existing 115-kV Cedar Lake Transmission Line in Scott and Rice Counties under the alternative review process.

On July 5, 2023, the Commission issued an Order finding the application complete and requested a full administrative law judge (ALJ) report.

On August 1 and 2, 2023, the Commission and the Department of Commerce Energy Environmental Review and Analysis (EERA) staff conducted public information and environmental assessment scoping meetings. One meeting was held in New Prague, and the other meeting was held online.

On October 26, 2023, the Commission issued an Order requiring EERA to evaluate the preferred route and the County Hollows Lane Alternative, an expanded route width between Cedar Lake Substation and Highway 19, and an analysis of an under build for the full length of the proposed route.

On November 16, 2023, EERA issued the EA scoping decision.

On December 28, 2023, EERA issued the EA.

On January 10, 2024, GRE filed direct testimony from Mark Strohfus.

On January 24 and 25, 2024, ALJ Suzanne Todnem with the Office of Administrative Hearings (OAH) presided over in-person and virtual public hearings. The hearings included presentations from GRE, Commission staff, and EERA staff. A court reporter was present to transcribe the public hearings. Written comments were accepted through February 7, 2024.

On February 16, 2024, GRE submitted comments, a proposed route permit, and proposed findings of fact.

On March 27, 2024, DOC EERA submitted a reply to GRE's comments, proposed findings of fact, and a draft route permit.

On March 29, 2024, the OAH submitted findings of fact, conclusions of law, and recommendations.

On April 12, 2024, DOC EERA filed a letter identifying no exceptions to the ALJ's report.

On April 15, 2024, GRE filed a letter identifying no exceptions to the ALJ's report.

On April 26, 2024, GRE filed a revised proposed permit into the record. The revised document contained project location details that were inadvertently omitted in its February 16, 2024 filing.

## **ADMINISTRATIVE LAW JUDGE REPORT**

The Commission referred this Project to the OAH for the assignment of an ALJ to conduct public hearings. The ALJ was charged with applying routing criteria established in statute and rule and preparing a report containing findings of fact, conclusions of law, and a recommendation on the proposed project and conditions and provisions to be included in the route permit.

Rather than repeat the ALJ's full analysis, staff has summarized the recommendations concerning the adequacy of the EA and whether a route permit should be issued. Staff refers Commissioners to the ALJ Report for a complete analysis of the Project.

### Adequacy of Environmental Assessment

The ALJ found that EERA prepared an adequate EA for the project, which satisfied Minn. R. 7850.3700<sup>1</sup> and 7850.3900<sup>2</sup>. The EA included the items required by Minn. R. 7850.3700, subp. 4 and was prepared in compliance with Minn R. 7850.3700. The ALJ also reported that the EA and the record addressed the issues identified in the scoping decision to a reasonable extent.<sup>3</sup>

### Route Permit

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<sup>1</sup> [7850.3700 - MN Rules Part](#)

<sup>2</sup> [7850.3900 - MN Rules Part](#)

<sup>3</sup> OAH, [Report – Findings of Fact, Conclusions of Law, and Recommendations](#), p. 41.

The ALJ reported that the evidence in the record demonstrated that the Proposed Route best satisfied the Route Permit factors in Minn. Stat. § 216E.04, subd. 8 and Minn. R. 7850.4100. They also found that there is no feasible and prudent alternative to the construction of the Project.

## 1. ALJ Route Analysis

- “The proposed route (including the application alignment) and the Country Hollows Lane alternative alignment<sup>4</sup> would have similar and minimal impacts on displacement, noise, cultural values, public service and infrastructure, public health and safety, land-based economies, air quality, geology and topography, groundwater, surface water, and rare and unique natural resources.”<sup>5</sup>
- The proposed route (including the application alignment) and the Country Hollows Lane alternative alignment follow existing rights-of-way for most of their lengths.<sup>6</sup>
- The Commission requested that the EA include analysis of the Expanded Route width alternative alignment. Compared to the application alignment, the Expanded Route Width alternative alignment has greater potential for environmental impact, including impacts to agricultural land, forested land, forested wetland, and emergent wetlands, as well as increased habitat fragmentation.<sup>7</sup>
- The Commission requested that the EA include an analysis of an under-build option for the full length of the proposed route paralleling Highway 19 of the existing distribution line. Minnesota Valley Electric Cooperative (MVEC) owns this existing distribution line, and they anticipate burying the distribution lines for the entire length of the 115-kV line. If the distribution lines were attached to 115-kV structures, the structures would need to be five to 10 feet taller to accommodate the under-build.<sup>8</sup>

## 2. ALJ Conditions<sup>9</sup>

The ALJ wrote that the general route permit conditions are appropriate for the Project, with the following special conditions:

Special Condition	Proposed Language
Independent Third-Party Monitor	<i>Prior to any construction, the Permittee shall propose a scope</i>

<sup>4</sup> DOC EERA, [Environmental Assessments Figures 1 – 5 \[Maps\]](#), p. 2 – 6.

<sup>5</sup> OAH, [Report – Findings of Fact, Conclusions of Law, and Recommendations](#), p. 39.

<sup>6</sup> Ibid.

<sup>7</sup> Ibid.

<sup>8</sup> Ibid., 13.

<sup>9</sup> Ibid., p. 42.

	<i>of work and identify an independent third-party monitor to conduct Project construction monitoring on behalf of Commerce. The scope of work shall be developed in consultation with and approved by Commerce. This third-party monitor will report directly to and will be under the control of Commerce with costs borne by the Permittee.</i>
US Fish and Wildlife Service	<i>The permittee shall coordinate with USFWS regarding the timing of tree-clearing and any other construction or restoration actions that may impact Northern Long-Eared Bat and Bald Eagle in the vicinity of the Project.</i>
Vegetation Management Plan	<p><i>Permittee shall develop a vegetation management plan in coordination with EERA and DNR. The VMP and documentation of the coordination efforts between the permittee and the coordinating agencies shall be filed at least 14 days prior to the plan and profile for the project. The Permittee shall provide all affected landowners with copies of the plan.</i></p> <p><i>The VMP must include the following:</i></p> <ul style="list-style-type: none"> <li><i>• Management objectives addressing short term (seeding and establishment) and long-term goals (life of the project).</i></li> <li><i>• A description of planned restoration and vegetation management activities, including how the site will be prepared, timing of activities, how seeding will occur (broadcast, drilling, etc.), and the types of seed mixes to be used.</i></li> <li><i>• A description of tree removal/planting activities and the timing of such activities.</i></li> <li><i>• A description of how the site will be monitored and evaluated to meet management goals.</i></li> <li><i>• A description of the management tools used to maintain vegetation (e.g., mowing, spot spraying, hand removal, fire, grazing, etc.), including the timing and frequency of maintenance activities.</i></li> </ul>
Dust Control	<i>The Permittee shall utilize non-chloride products for</i>

	<i>dust control during construction.</i>
Bio-Netting	<i>The Permittee shall use only “bio-netting” or “natural netting” types and mulch products without synthetic (plastic) fiber additives.</i>

### EXCEPTIONS

DOC EERA and Great River Energy had no exceptions to the ALJ’s Report.

### LATE FILINGS

On April 26, 2024, GRE corrected the draft route permit<sup>10</sup> they filed on February 16, 2024. In response, DOC EERA filed a letter<sup>11</sup> on April 30, 2024, requesting GRE to update the permit it had submitted into the record to reflect the ALJ’s recommendation.

The route permit attached by staff reflects the ALJ’s conclusions and recommendations, given that no exceptions were filed to the ALJ Report.

### STAFF ANALYSIS

#### ALJ Report

Staff agrees with the ALJ’s findings and conclusions in their report. Staff also agrees with the special permit conditions outlined by the ALJ, which include an independent third-party monitor, coordination with the US Fish and Wildlife Service, the vegetation management plan, the use of dust control products, and bio-netting. There are no special permit conditions in dispute.

The attached draft route permit contains the independent third-party monitor in section 5.3.3, not under the special permit conditions.

#### Environmental Assessment

Staff agrees with the ALJ’s finding that the EA is adequate as it properly addresses the issues and alternatives raised in the Scoping Decision. The EA was prepared in compliance with the procedures in Minn. R. 7850.3700.

#### Route Permit

Staff agrees with the ALJ that the proposed route is the best alternative. In adopting the proposed route, the Commission would still allow the applicants to consider the Country Hollow Lane Alternative Alignment, as it would be included in the requested route width of the applicant’s proposal. Staff notes that the Country Hollow Land Alternative Alignment could have increased environment impacts and further impede on a landowner’s property across the

<sup>10</sup> GRE, [Revised Route Permit](#), 4/26/2024.

<sup>11</sup> DOC EERA, [Comments on the Applicant’s Revised Route Permit](#), 4/30/2024.



street versus the proposed route.

## DECISION OPTIONS

### ALJ Report

1. Adopt the ALJ report to the extent it is consistent with the Commission's decisions. (DOC EERA, Great River Energy)

### Environmental Assessment

2. Find that the Environmental Assessment and the record created at the public hearing address the issues identified in the Scoping Decision (DOC EERA, Great River Energy), **OR**
3. Find the Environmental Assessment is not complete, identify the deficiencies and request the Environmental Assessment be revised or supplemented, and determine a schedule for its completion.

### Route Permit

4. Issue the attached Route Permit, which identifies the route proposed by Great River Energy for its 115-kV Cedar Lake Transmission Line Reroute Project and includes the requirements and conditions recommended by the ALJ. (DOC EERA, Great River Energy), **OR**
5. Deny the route permit.

### Administrative

6. Delegate authority to the Executive Secretary to modify the proposed route permit to correct typographical or formatting errors and ensure consistency with the Commission's order.

**Staff Recommendation: 1, 2, 4, 6**

**STATE OF MINNESOTA PUBLIC UTILITIES COMMISSION**

**ROUTE PERMIT FOR  
THE CEDAR LAKE REROUTE PROJECT**

**A HIGH-VOLTAGE TRANSMISSION LINE AND ASSOCIATED FACILITIES**

**IN  
SCOTT AND RICE COUNTIES**

**ISSUED TO  
GREAT RIVER ENERGY**

**PUC DOCKET NO. ET2/TL-23-170**

In accordance with the requirements of Minnesota Statutes Chapter 216E and Minnesota Rules Chapter 7850 this route permit is hereby issued to:

**GREAT RIVER ENERGY**

Great River Energy is authorized by this route permit to construct and operate a 6.3-mile 115-kV Transmission Line in Helena Township and Cedar Lake Township in Scott County, and Wheatland Township in Rice County, Minnesota.

The high-voltage transmission line shall be constructed within the route identified in this route permit and in compliance with the conditions specified in this route permit.

Approved and adopted this \_\_\_\_ day of May 2024

BY ORDER OF THE COMMISSION

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Will Seuffert,  
Executive Secretary

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## **ATTACHMENTS**

Attachment 1 – Complaint Handling Procedures for Permitted Energy Facilities

Attachment 2 – Compliance Filing Procedures for Permitted Energy Facilities

Attachment 3 – Route Permit Maps

## **1 ROUTE PERMIT**

The Minnesota Public Utilities Commission (Commission) hereby issues this route permit to Great River Energy (Permittee) pursuant to Minnesota Statutes Chapter 216E and Minnesota Rules Chapter 7850. This route permit authorizes the Permittee to construct and operate a 6.3-mile 115-kV transmission line in Helena and Cedar Lake Townships in Scott County, and Wheatland Township in Rice County, Minnesota (henceforth known as Transmission Facility). The high-voltage transmission line shall be constructed within the route identified in this route permit and in compliance with the conditions specified in this route permit.

### **1.1 Pre-emption**

Pursuant to Minn. Stat. § 216E.10, this route permit shall be the sole route approval required for construction of the transmission facilities and this route permit shall supersede and preempt all zoning, building, or land use rules, regulations, or ordinances promulgated by regional, county, local and special purpose governments.

## **2 TRANSMISSION FACILITY DESCRIPTION**

Great River Energy (GRE) will construct and own approximately 6.3 miles of new 115 kilovolt (kV) high voltage transmission line (HVTL) beginning at the Cedar Lake Substation located in Helena Township and terminating at a switch at GRE's existing MV-EVX 115-kV transmission line.

The Transmission Facility is located in the following:

County	Township Name	Township	Range	Sections
Scott	Helena	T113N	R23W	25, 36
Scott	Cedar Lake	T113N	R22W	30, 31, 32, 33, 34, 35
Rice	Wheatland	T112N	R22W	2, 3, 4, 5, 6

### **2.1 Structures**

The 115-kV line will consist primarily of single circuit, monopole wood structures spaced approximately 300 to 400 feet apart. Laminated wood or steel structures may be needed for switch structures, angle structures, and dead-end structures. Guy wires may also be used on some angle structures. Transmission structures will typically range in height from 60 to 90 feet above ground, depending upon the terrain and environmental constraints. The average diameter of the wood structures at ground level is 20 inches.

## 2.2 Conductors

The single-circuit structures will have three single conductor phase wires and one shield wire. The phase wires are anticipated to be 795 thousand circular mil aluminum conductor steel reinforced (795 ASCR) or a conductor with similar capacity. The shield wire will be 0.528 optical ground wire.

The table below details specifics on the various structure and conductor types as presented in the route permit application.

Structure Type	Material	Approximate Height Above Ground (feet)	Structure Base Diameter	Span Between Distances (feet)
Monopole with a horizontal post or braced post	Wood, Steel, or ductile iron	60 - 90	18 – 36	300 - 400
H-Frame	Wood, Steel, or ductile iron	60 - 90	18 – 36	350 - 800
Three-pole	Wood, Steel, or ductile iron	60 - 90	18 – 36	350 - 800

## 2.3 Substations and Associated Facilities

The Cedar Lake Substation is equipped with breakers and relays. No modifications are anticipated other than to connect the new transmission line to the substation.

## 3 DESIGNATED ROUTE

The route designated by the Commission is depicted on the route maps attached to this route permit (Designated Route). The Designated Route is generally described as follows:

The Project will begin at GRE's existing Cedar Lake Substation located approximately 1,000 feet south of 260th Street West in Helena Township in Scott County. The route will extend east from the Cedar Lake Substation through agricultural fields and forested areas to Baseline Avenue. From there, it will continue to follow Baseline Avenue south until 270th Street West to Baseline Avenue's termination point. The route will continue south for approximately 1,300 feet to a landowner property boundary, where it will turn east for approximately 600 feet to the eastern edge of the landowner property boundary. The route will then continue south for approximately 2,650 feet to 280th Street East/State Highway 19 and then turn east. It will

continue along 280th Street East/State Highway 19 for approximately 4 miles until it intersects with GRE's existing MV-EVX 115-kV line near Panama Avenue/County Highway 23.

The Designed Route includes an anticipated alignment and a right-of-way. The right-of-way is the physical land needed for the safe operation of the transmission line. The Permittee shall locate the alignment and associated right-of-way within the Designated Route unless otherwise authorized by this route permit or the Commission. The Designated Route provides the Permittee with flexibility for minor adjustments of the alignment and right-of-way to accommodate landowner requests and unforeseen conditions.

Any modifications to the Designated Route or modifications that would result in right-of-way placement outside the Designated Route shall be specifically reviewed by the Commission in accordance with Minn. R. 7850.4900 and Section 10 of this route permit.

#### **4 RIGHT-OF-WAY**

This route permit authorizes the Permittee to obtain a new permanent right-of-way for the transmission line up to 100 feet in width. The permanent right-of-way is typically 50 feet on both sides of the transmission line measured from its centerline or alignment.

The anticipated alignment is intended to minimize potential impacts relative to the criteria identified in Minn. R. 7850.4100. The final alignment must generally conform to the anticipated alignment identified on the route maps unless changes are requested by individual landowners and agreed to by the Permittee or for unforeseen conditions that are encountered or as otherwise provided for by this route permit.

Any right-of-way or alignment modifications within the Designated Route shall be located so as to have comparable overall impacts relative to the factors in Minn. R. 7850.4100, as does the right-of-way and alignment identified in this route permit, and shall be specifically identified and documented in and approved as part of the plan and profile submitted pursuant to Section 9.1 of this route permit.

Where the transmission line parallels existing highway and other road rights-of-way, the transmission line right-of-way shall occupy and utilize the existing right-of-way to the maximum extent possible; consistent with the criteria in Minn. R. 7850.4100, and the other requirements of this route permit; and for highways under the jurisdiction of the Minnesota Department of Transportation (MnDOT), the procedures for accommodating utilities in trunk highway rights-of-way.

#### **5 GENERAL CONDITIONS**

The Permittee shall comply with the following conditions during construction and operation of the Transmission Facility over the life of this route permit.

### **5.1 Route Permit Distribution**

Within 30 days of issuance of this route permit, the Permittee shall provide all affected landowners with a copy of this route permit and the complaint procedures. An affected landowner is any landowner or designee that is within or adjacent to the Designated Route. In no case shall a landowner receive this route permit and complaint procedures less than five days prior to the start of construction on their property. The Permittee shall also provide a copy of this route permit and the complaint procedures to the applicable regional development commissions, county environmental offices, and city and township clerks. The Permittee shall file with the Commission an affidavit of its route permit and complaint procedures distribution within 30 days of issuance of this route permit.

### **5.2 Access to Property**

The Permittee shall notify landowners prior to entering or conducting maintenance within their property, unless otherwise negotiated with the landowner. The Permittee shall keep records of compliance with this section and provide them upon the request of the Minnesota Department of Commerce (Department of Commerce) staff or Commission staff.

### **5.3 Construction and Operation Practices**

The Permittee shall comply with the construction practices, operation and maintenance practices, and material specifications described in the permitting record for this Transmission Facility unless this route permit establishes a different requirement in which case this route permit shall prevail.

#### **5.3.1 Field Representative**

The Permittee shall designate a field representative responsible for overseeing compliance with the conditions of this route permit during construction of the Transmission Facility. This person shall be accessible by telephone or other means during normal business hours throughout site preparation, construction, cleanup, and restoration.

The Permittee shall file with the Commission the name, address, email, phone number, and emergency phone number of the field representative at least 14 days prior to the pre-construction meeting. The Permittee shall provide the field representative's contact information to affected landowners, local government units and other interested persons at least 14 days prior to the pre-construction meeting. The Permittee may change the field



representative at any time upon notice to the Commission, affected landowners, local government units and other interested persons. The Permittee shall file with the Commission an affidavit of distribution of its field representative's contact information at least 14 days prior to the pre-construction meeting and upon changes to the field representative.

### **5.3.2 Employee Training - Route Permit Terms and Conditions**

The Permittee shall train all employees, contractors, and other persons involved in the Transmission Facility construction regarding the terms and conditions of this route permit. The Permittee shall keep records of compliance with this section and provide them upon the request of Department of Commerce staff or Commission staff.

### **5.3.3 Independent Third-Party Monitoring**

Prior to any construction, the Permittee shall propose a scope of work and identify an independent third-party monitor to conduct construction monitoring on behalf of the Department of Commerce. The scope of work shall be developed in consultation with and approved by the Department of Commerce. This third-party monitor will report directly to and will be under the control of the Department of Commerce with costs borne by the Permittee. Department of Commerce staff shall keep records of compliance with this section and will ensure that status reports detailing the construction monitoring are filed with the Commission in accordance with scope of work approved by the Department of Commerce.

### **5.3.4 Public Services, Public Utilities, and Existing Easements**

During Transmission Facility construction, the Permittee shall minimize any disruption to public services or public utilities. To the extent disruptions to public services or public utilities occur these shall be temporary, and the Permittee shall restore service promptly. Where any impacts to utilities have the potential to occur the Permittee shall work with both landowners and local entities to determine the most appropriate mitigation measures if not already considered as part of this route permit.

The Permittee shall cooperate with county and city road authorities to develop appropriate signage and traffic management during construction. The Permittee shall keep records of compliance with this section and provide them upon the request of Department of Commerce staff or Commission staff.

### **5.3.5 Temporary Workspace**

The Permittee shall limit temporary easements to special construction access needs and additional staging or lay-down areas required outside of the authorized right-of-way.

Temporary space shall be selected to limit the removal and impacts to vegetation. The Permittee shall obtain temporary easements outside of the authorized transmission line right-of-way from affected landowners through rental agreements. Temporary easements are not provided for in this route permit.

The Permittee may construct temporary driveways between the roadway and the structures to minimize impact using the shortest route feasible. The Permittee shall use construction mats to minimize impacts on access paths and construction areas. The Permittee shall submit the location of temporary workspaces and driveways with the plan and profile pursuant to Section 9.1.

#### **5.3.6 Noise**

The Permittee shall comply with noise standards established under Minn. R. 7030.0010 to 7030.0080. The Permittee shall limit construction and maintenance activities to daytime working hours to the extent practicable.

#### **5.3.7 Aesthetics**

The Permittee shall consider input pertaining to visual impacts from landowners or land management agencies prior to final location of structures, rights-of-way, and other areas with the potential for visual disturbance. The Permittee shall use care to preserve the natural landscape, minimize tree removal and prevent any unnecessary destruction of the natural surroundings in the vicinity of the Transmission Facility during construction and maintenance. The Permittee shall work with landowners to locate the high-voltage transmission line to minimize the loss of agricultural land, forest, and wetlands, and to avoid homes and farmsteads. The Permittee shall place structures at a distance, consistent with sound engineering principles and system reliability criteria, from intersecting roads, highways, or trail crossings.

#### **5.3.8 Soil Erosion and Sediment Control**

The Permittee shall implement those erosion prevention and sediment control practices recommended by the Minnesota Pollution Control Agency (MPCA) Construction Stormwater Program. If construction of the Transmission Facility disturbs more than one acre of land or is sited in an area designated by the MPCA as having potential for impacts to water resources, the Permittee shall obtain a National Pollutant Discharge Elimination System/State Disposal System Construction Stormwater Permit from the MPCA that provides for the development of a Stormwater Pollution Prevention Plan that describes methods to control erosion and runoff.

The Permittee shall implement reasonable measures to 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 with the natural terrain, and are left in a condition that will facilitate re-vegetation and prevent erosion. All areas disturbed during construction of the Transmission Facility shall be returned to pre-construction conditions.

### **5.3.9 Wetlands and Water Resources**

The Permittee shall develop wetland impact avoidance measures and implement them during construction of the Transmission Facility. As practical, measures shall include spacing and placing the power poles at variable distances to span and avoid wetlands, watercourses, and floodplains. Unavoidable wetland impacts as a result of the placement of poles shall be limited to the immediate area around the poles. To minimize impacts, the Permittee shall construct in wetland areas during frozen ground conditions where practicable and according to permit requirements by the applicable permitting authority. When construction during winter is not possible, the Permittee shall use wooden or composite mats to protect wetland vegetation.

The Permittee shall contain soil excavated from the wetlands and riparian areas and not place it back into the wetland or riparian area. The Permittee shall access wetlands and riparian areas using the shortest route possible in order to minimize travel through wetland areas and prevent unnecessary impacts. The Permittee shall not place staging or stringing set up areas within or adjacent to wetlands or water resources, as practicable. The Permittee shall assemble power pole structures on upland areas before they are brought to the site for installation.

The Permittee shall restore wetland and water resource areas disturbed by construction activities to pre-construction conditions in accordance with the requirements of applicable state and federal permits or laws and landowner agreements. The Permittee shall meet the USACE, Minnesota Department of Natural Resources (DNR), Minnesota Board of Water and Soil Resources, and local units of government wetland and water resource requirements.

### **5.3.10 Vegetation Management**

The Permittee shall minimize the number of trees to be removed in selecting the right-of-way specifically preserving to the maximum extent practicable windbreaks, shelterbelts, living snow fences, and vegetation in areas such as trail and stream crossings where vegetative screening may minimize aesthetic impacts, to the extent that such actions do not violate sound engineering principles or system reliability criteria.

The Permittee shall remove tall growing species located within the transmission line right-of-way that endanger the safe and reliable operation of the transmission line. The Permittee shall leave undisturbed, to the extent possible, existing low growing species in the right-of-way or replant such species in the right-of-way to blend the difference between the right-of-way and adjacent areas, to the extent that the low growing vegetation that will not pose a threat to the transmission line or impede construction.

#### **5.3.11 Application of Pesticides**

The Permittee shall restrict pesticide use to those pesticides and methods of application approved by the Minnesota Department of Agriculture (MDA), DNR, and the U.S. Environmental Protection Agency (EPA). Selective foliage or basal application shall be used when practicable. All pesticides shall be applied in a safe and cautious manner so as not to damage adjacent properties including crops, orchards, tree farms, apiaries, or gardens. The Permittee shall contact the landowner at least 14 days prior to pesticide application on their property. The Permittee may not apply any pesticide if the landowner requests that there be no application of pesticides within the landowner's property. The Permittee shall provide notice of pesticide application to landowners and beekeepers operating apiaries within three miles of the pesticide application area at least 14 days prior to such application. The Permittee shall keep pesticide communication and application records and provide them upon the request of Department of Commerce staff or Commission staff.

#### **5.3.12 Invasive Species**

The Permittee shall employ best management practices to avoid the potential introduction and spread of invasive species on lands disturbed by Transmission Facility construction activities. The Permittee shall develop an Invasive Species Prevention Plan and file it with the Commission at least 14 days prior to the pre-construction meeting. The Permittee shall comply with the most recently filed Invasive Species Prevention Plan.

#### **5.3.13 Noxious Weeds**

The Permittee shall take all reasonable precautions against the spread of noxious weeds during all phases of construction. When utilizing seed to establish temporary and permanent vegetative cover on exposed soil the Permittee shall select site appropriate seed certified to be free of noxious weeds. To the extent possible, the Permittee shall use native seed mixes. The Permittee shall keep records of compliance with this section and provide them upon the request of Department of Commerce staff or Commission staff.

#### **5.3.14 Roads**

The Permittee shall advise the appropriate governing bodies having jurisdiction over all state, county, city, or township roads that will be used during the construction phase of the Transmission Facility. Where practical, existing roadways shall be used for all activities associated with construction of the Transmission Facility. Oversize or overweight loads associated with the Transmission Facility shall not be hauled across public roads without required permits and approvals.

The Permittee shall construct the fewest number of site access roads required. Access roads shall not be constructed across streams and drainage ways without the required permits and approvals. Access roads shall be constructed in accordance with all necessary township, county or state road requirements and permits.

The Permittee shall promptly repair private roads or lanes damaged when moving equipment or when accessing construction workspace, unless otherwise negotiated with the affected landowner.

#### **5.3.15 Archaeological and Historic Resources**

The Permittee shall make every effort to avoid impacts to archaeological and historic resources when constructing the Transmission Facility. In the event that a resource is encountered, the Permittee shall 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 Transmission Facility impacts on the resource consistent with State Historic Preservation Office and State Archaeologist requirements.

Prior to construction, the Permittee shall train workers 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. The Permittee shall not resume construction at such location until authorized by local law enforcement or the State Archaeologist. The Permittee shall keep records of compliance with this section and provide them upon the request of Department of Commerce staff or Commission staff.

#### **5.3.16 Avian Protection**

The Permittee in cooperation with the DNR shall identify areas of the transmission line 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 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 shall submit documentation of its avian protection coordination with the plan and profile pursuant to Section 9.1.

#### **5.3.17 Drainage Tiles**

The Permittee shall avoid, promptly repair, or replace all drainage tiles broken or damaged during all phases of the Transmission Facility's life unless otherwise negotiated with the affected landowner. The Permittee shall keep records of compliance with this section and provide them upon the request of Department of Commerce staff or Commission staff.

#### **5.3.18 Restoration**

The Permittee shall restore the right-of-way, temporary workspaces, access roads, abandoned right-of-way, and other public or private lands affected by construction of the Transmission Facility. Restoration within the right-of-way must be compatible with the safe operation, maintenance, and inspection of the transmission line. Within 60 days after completion of all restoration activities, the Permittee shall file with the Commission a Notice of Restoration Completion.

#### **5.3.19 Cleanup**

The Permittee shall remove and properly dispose of all construction waste and scrap from the right-of-way and all premises on which construction activities were conducted upon completion of each task. The Permittee shall remove and properly dispose of all personal litter, including bottles, cans, and paper from construction activities daily.

#### **5.3.20 Pollution and Hazardous Wastes**

The Permittee shall take all appropriate precautions to protect against pollution of the environment. The Permittee shall be responsible for compliance with all laws applicable to the generation, storage, transportation, clean up and disposal of all waste generated during construction and restoration of the Transmission Facility.

#### **5.3.21 Damages**

The Permittee shall fairly restore or compensate landowners for damage to crops, fences, private roads and lanes, landscaping, drain tile, or other damages sustained during construction. The Permittee shall keep records of compliance with this section and provide them upon the request of Department of Commerce staff or Commission staff.

## **5.4 Electrical Performance Standards**

### **5.4.1 Grounding**

The Permittee shall design, construct, and operate the transmission line in a manner so that the maximum induced steady-state short-circuit current shall be limited to five milliamperes root mean square (rms) alternating current between the ground and any non-stationary object within the right-of-way, including but not limited to large motor vehicles and agricultural equipment. All fixed metallic objects on or off the right-of-way, except electric fences that parallel or cross the right-of-way, shall be grounded to the extent necessary to limit the induced short-circuit current between ground and the object so as not to exceed one milliamperes rms under steady state conditions of the transmission line and to comply with the ground fault conditions specified in the National Electric Safety Code. The Permittee shall address and rectify any induced current problems that arise during transmission line operation.

### **5.4.2 Electric Field**

The Permittee shall design, construct, and operate the transmission line in such a manner that the electric field measured one meter above ground level immediately below the transmission line shall not exceed 8.0 kV/m rms.

### **5.4.3 Interference with Communication Devices**

If interference with radio or television, satellite, wireless internet, GPS-based agriculture navigation systems or other communication devices is caused by the presence or operation of the Transmission Facility, the Permittee shall take whatever action is necessary to restore or provide reception equivalent to reception levels in the immediate area just prior to the construction of the Transmission Facility. The Permittee shall keep records of compliance with this section and provide them upon the request of Department of Commerce staff or Commission staff.

## **5.5 Other Requirements**

### **5.5.1 Safety Codes and Design Requirements**

The Permittee shall design the transmission line and associated facilities to meet or exceed all relevant local and state codes, the National Electric Safety Code, and North American Electric Reliability Corporation requirements. This includes standards relating to clearances to ground, clearance to crossing utilities, clearance to buildings, strength of materials, clearances over roadways, right-of-way widths, and permit requirements.

### **5.5.2 Other Permits and Regulations**

The Permittee shall comply with all applicable state statutes and rules. The Permittee shall obtain all required permits for the Transmission Facility and comply with the conditions of those permits unless those permits conflict with or are preempted by federal or state permits and regulations.

At least 14 days prior to the pre-construction meeting, the Permittee shall file with the Commission an Other Permits and Regulations Submittal that contains a detailed status of all permits, authorizations, and approvals that have been applied for specific to the Transmission Facility. The Other Permits and Regulations Submittal shall also include the permitting agency name; the name of the permit, authorization, or approval being sought; contact person and contact information for the permitting agency or authority; brief description of why the permit, authorization, or approval is needed; application submittal date; and the date the permit, authorization, or approval was issued or is anticipated to be issued.

The Permittee shall demonstrate that it has obtained all necessary permits, authorizations, and approvals by filing an affidavit stating as such and an updated Other Permits and Regulations Submittal prior to commencing construction. The Permittee shall provide a copy of any such permits, authorizations, and approvals at the request of Department of Commerce staff or Commission staff.

## **6 SPECIAL CONDITIONS**

The special conditions shall take precedence over other conditions of this permit should there be a conflict.

### **6.1 Coordination with U.S. Fish and Wildlife Service**

The permittee shall coordinate with the U.S. Fish and Wildlife Service regarding the timing of tree-clearing and any other construction or restoration actions that may impact Northern Long-Eared Bat and Bald Eagle in the vicinity of the Transmission Facility.

### **6.2 Vegetation Management Plan**

The Permittee shall develop a vegetation management plan (VMP) in coordination with the Department of Commerce and the DNR. The VMP and documentation of the coordination efforts between the permittee and the coordinating agencies shall be filed at least 14 days prior to the plan and profile for the project. The Permittee shall provide all affected landowners with copies of the plan.



The VMP must include the following:

- Management objectives addressing short term (seeding and establishment) and long-term goals (life of the project).
- A description of planned restoration and vegetation management activities, including how the site will be prepared, timing of activities, how seeding will occur (broadcast, drilling, etc.), and the types of seed mixes to be used.
- A description of tree removal/planting activities and the timing of such activities.
- A description of how the site will be monitored and evaluated to meet management goals.
- A description of the management tools used to maintain vegetation (e.g., mowing, spot spraying, hand removal, fire, grazing, etc.), including the timing and frequency of maintenance activities.

### **6.3 Dust Control**

The Permittee shall utilize non-chloride products for dust control during construction.

### **6.4 Bio-Netting**

The Permittee shall use only “bio-netting” or “natural netting” types and mulch products without synthetic (plastic) fiber additives.

## **7 DELAY IN CONSTRUCTION**

If the Permittee has not commenced construction or improvement of the route within four years after the date of issuance of this route permit the Permittee shall file a Failure to Construct Report and the Commission shall consider suspension of this route permit in accordance with Minn. R. 7850.4700.

## **8 COMPLAINT PROCEDURES**

At least 14 days prior to the pre-construction meeting, the Permittee shall file with the Commission the complaint procedures that will be used to receive and respond to complaints. The complaint procedures shall be in accordance with the requirements of Minn. R. 7829.1500 or Minn. R. 7829.1700, and as set forth in the complaint procedures attached to this route permit.

Upon request, the Permittee shall assist Department of Commerce staff or Commission staff with the disposition of unresolved or longstanding complaints. This assistance shall include, but is not limited to, the submittal of complaint correspondence and complaint resolution efforts.

## **9 COMPLIANCE REQUIREMENTS**

Failure to timely and properly make compliance filings required by this route permit is a failure to comply with the conditions of this route permit. Compliance filings must be electronically filed with the Commission.

### **9.1 Pre-Construction Meeting**

Prior to the start of construction, the Permittee shall participate in a pre-construction meeting with Department of Commerce and Commission staff to review pre-construction filing requirements, scheduling, and to coordinate monitoring of construction and site restoration activities. Within 14 days following the pre-construction meeting, the Permittee shall file with the Commission a summary of the topics reviewed and discussed and a list of attendees. The Permittee shall indicate in the filing the anticipated construction start date.

### **9.2 Plan and Profile**

At least 14 days prior to the pre-construction meeting, the Permittee shall file with the Commission, and provide the Department of Commerce, and the counties where the Transmission Facility, or portion of the Transmission Facility, will be constructed with a plan and profile of the right-of-way and the specifications and drawings for right-of-way preparation, construction, structure specifications and locations, cleanup, and restoration for the Transmission Facility. The documentation shall include maps depicting the plan and profile including the right-of-way, alignment, and structures in relation to the route and alignment approved per this route permit.

The Permittee may not commence construction until the earlier of (i) 30 days after the pre-construction meeting or (ii) or until the Commission staff has notified the Permittee in writing that it has completed its review of the documents and determined that the planned construction is consistent with this route permit.

If the Commission notifies the Permittee in writing within 30 days after the pre-construction meeting that it has completed its review of the documents and planned construction, and finds that the planned construction is not consistent with this route permit, the Permittee may submit additional and/or revised documentation and may not commence construction until the Commission has notified the Permittee in writing that it has determined that the planned construction is consistent with this route permit.

If the Permittee intends to make any significant changes in its plan and profile or the specifications and drawings after submission to the Commission, the Permittee shall notify the Commission, the Department of Commerce, and county staff at least five days before implementing the changes. No changes shall be made that would be in violation of any of the terms of this route permit.

### **9.3 Status Reports**

The Permittee shall file with the Commission monthly Construction Status Reports beginning with the pre-construction meeting and until completion of restoration. Construction Status Reports shall describe construction activities and progress, activities undertaken in compliance with this route permit, and shall include text and photographs.

If the Permittee does not commence construction of the Transmission Facility within six months of this route permit issuance, the Permittee shall file with the Commission Pre-Construction Status Reports on the anticipated timing of construction every six months beginning with the issuance of this route permit until the pre-construction meeting.

### **9.4 In-Service Date**

At least three days before the Transmission Facility is to be placed into service, the Permittee shall notify the Commission of the date on which the Transmission Facility will be placed into service and the date on which construction was completed.

### **9.5 As-Builts**

Within 90 days after completion of construction, the Permittee shall submit to the Commission copies of all final as-built plans and specifications developed during the Transmission Facility construction.

### **9.6 GPS Data**

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 all structures associated with the Transmission Facility and each substation connected.

### **9.7 Right of Entry**

The Permittee shall allow Commission designated representatives to perform the following,

upon reasonable notice, upon presentation of credentials and at all times in compliance with the Permittee's site safety standards:

- (a) To enter upon the facilities easement of the property for the purpose of obtaining information, examining records, and conducting surveys or investigations.
- (b) To bring such equipment upon the facilities easement of the property as is necessary to conduct such surveys and investigations.
- (c) To sample and monitor upon the facilities easement of the property.  
To examine and copy any documents pertaining to compliance with the conditions of this route permit.

## **10 ROUTE PERMIT AMENDMENT**

This route permit may be amended at any time by the Commission. Any person may request an amendment of the conditions of this route permit by submitting a request to the Commission in writing describing the amendment sought and the reasons for the amendment. The Commission will mail notice of receipt of the request to the Permittee. The Commission may amend the conditions after affording the Permittee and interested persons such process as is required under Minn. R. 7850.4900.

## **11 TRANSFER OF ROUTE PERMIT**

The Permittee may request at any time that the Commission transfer this route permit to another person or entity (transferee). In its request, the Permittee must provide the Commission with:

- (a) the name and description of the transferee;
- (b) the reasons for the transfer;
- (c) a description of the facilities affected; and
- (d) the proposed effective date of the transfer.

The transferee must provide the Commission with a certification that it has read, understands and is able to comply with the plans and procedures filed for the Transmission Facility and all conditions of this route permit. The Commission may authorize transfer of the route permit after affording the Permittee, the transferee, and interested persons such process as is required under Minn. R. 7850.5000.

## **12 REVOCATION OR SUSPENSION OF ROUTE PERMIT**

The Commission may initiate action to revoke or suspend this route permit at any time. The Commission shall act in accordance with the requirements of Minn. R. 7850.5100, to revoke or suspend this route permit.

Proposed Permit

**ATTACHMENT 1**

Complaint Handling Procedures for Permitted Energy Facilities

**MINNESOTA PUBLIC UTILITIES COMMISSION  
COMPLAINT HANDLING PROCEDURES FOR  
PERMITTED ENERGY FACILITIES**

**A. Purpose**

To establish a uniform and timely method of reporting and resolving complaints received by the permittee concerning permit conditions for site or route preparation, construction, cleanup, restoration, operation, and maintenance.

**B. Scope**

This document describes complaint reporting procedures and frequency.

**C. Applicability**

The procedures shall be used for all complaints received by the permittee and all complaints received by the Minnesota Public Utilities Commission (Commission) under Minn. R. 7829.1500 or Minn. R. 7829.1700 relevant to this permit.

**D. Definitions**

**Complaint:** A verbal or written statement presented to the permittee by a person expressing dissatisfaction or concern regarding site or route preparation, cleanup or restoration, or other permit conditions. Complaints do not include requests, inquiries, questions or general comments.

**Substantial Complaint:** A written complaint alleging a violation of a specific permit condition that, if substantiated, could result in permit modification or suspension pursuant to the applicable regulations.

**Unresolved Complaint:** A complaint which, despite the good faith efforts of the permittee and a person, remains unresolved or unsatisfactorily resolved to one or both of the parties.

**Person:** An individual, partnership, joint venture, private or public corporation, association, firm, public service company, cooperative, political subdivision, municipal corporation, government agency, public utility district, or any other entity, public or private; however organized.

## **E. Complaint Documentation and Processing**

1. The permittee shall designate a representative responsible for filing complaints to the Commission's eDocket system. This person's name, phone number and email address shall accompany all complaint submittals. The name and contact information for the representative shall be kept current in eDockets.
2. A person presenting the complaint should, to the extent possible, include the following information in their communications:
  - a. name, address, phone number, and email address;
  - b. initial date of the complaint;
  - c. tract, parcel number, or address of the complaint;
  - d. a summary of the complaint; and
  - e. whether the complaint relates to a permit violation, a construction practice issue, or other type of complaint.
3. The permittee shall document all complaints by maintaining a record of all applicable information concerning the complaint, including the following:
  - a. docket number and project name;
  - b. name of complainant, address, phone number and email address;
  - c. precise description of property or parcel number;
  - d. name of permittee representative receiving complaint and date of receipt;
  - e. nature of complaint and the applicable permit condition(s);
  - f. summary of activities undertaken to resolve the complaint; and
  - g. a statement on the final disposition of the complaint.

## **F. Reporting Requirements**

The permittee shall commence complaint reporting at the beginning of project construction and continue through the term of the permit, unless otherwise required below. The permittee shall report all complaints to the Commission according to the following schedule:

**Immediate Reports:** All substantial complaints shall be reported to the Commission the same day received, or on the following working day for complaints received after working hours. Such reports are to be directed to the Commission's Public Advisor at 1-800-657-3782 (voice messages are acceptable) or [publicadvisor.puc@state.mn.us](mailto:publicadvisor.puc@state.mn.us). For e-mail reporting, the email



subject line should read “PUC EFP Complaint” and include the appropriate project docket number.

**Monthly Reports:** During project construction, restoration, and operation, a summary of all complaints, including substantial complaints received or resolved during the preceding month, shall be filed by the 15th of each month to Will Seuffert, Executive Secretary, Public Utilities Commission, using the eDockets system. The eDockets system is located at: <https://www.edockets.state.mn.us/EFiling/home.jsp>. If no complaints were received during the preceding month, the permittee shall file a summary indicating that no complaints were received.

If a project has submitted twelve consecutive months of complaint reports with no complaints, monthly reports can terminate by a letter to eDockets notifying the Commission of such action. If a substantial complaint is received (by the company or the Commission) following termination of the monthly complaint report, as noted above, the monthly reporting should commence for a period of six months following the most recent complaint or upon resolution of all pending complaints.

If a permittee is found to be in violation of this section, the Commission may reinstate monthly complaint reporting for the remaining permit term or enact some other commensurate requirement via notification by the Executive Secretary or some other action as decided by the Commission.

#### **G. Complaints Received by the Commission**

Complaints received directly by the Commission from aggrieved persons regarding the permit or issues related to site or route preparation, construction, cleanup, restoration, or operation and maintenance will be promptly sent to the permittee.

The permittee shall notify the Commission when the issue has been resolved. The permittee will add the complaint to the monthly reports of all complaints. If the permittee is unable to find resolution, the Commission will use the process outlined in the Unresolved Complaints Section to process the issue.

#### **H. Commission Process for Unresolved Complaints**

Complaints raising substantial and unresolved permit issues will be investigated by the Commission. Staff will notify the permittee and appropriate people if it determines that the

complaint is a substantial complaint. With respect to such complaints, the permittee and complainant shall be required to submit a written summary of the complaint and its current position on the issues to the Commission. Staff will set a deadline for comments. As necessary, the complaint will be presented to the Commission for consideration.

**I. Permittee Contacts for Complaints and Complaint Reporting**

Complaints may be filed by mail or email to the permittee's designated complaint representative, or to the Commission's Public Advisor at 1-800-657-3782 or [publicadvisor.puc@state.mn.us](mailto:publicadvisor.puc@state.mn.us). The name and contact information for the permittee's designated complaint representative shall be kept current in the Commission's eDocket system.

**ATTACHMENT 2**

**Compliance Filing Procedures for Permitted Energy Facilities**

**MINNESOTA PUBLIC UTILITIES COMMISSION  
COMPLIANCE FILING PROCEDURE FOR  
PERMITTED ENERGY FACILITIES**

**A. Purpose**

To establish a uniform and timely method of submitting information required by Commission energy facility permits.

**B. Scope and Applicability**

This procedure encompasses all known compliance filings required by permit.

**C. Definitions**

**Compliance Filing:** A filing of information to the Commission, where the information is required by a Commission site or route permit.

**D. Responsibilities**

1. The permittee shall file all compliance filings with Will Seuffert, Executive Secretary, Public Utilities Commission, through the eDockets system. The eDockets system is located at:  
<https://www.edockets.state.mn.us/EFiling/home.jsp>

General instructions are provided on the eDockets website. Permittees must register on the website to file documents.

2. All filings must have a cover sheet that includes:
  - a. Date
  - b. Name of submitter/permittee
  - c. Type of permit (site or route)
  - d. Project location
  - e. Project docket number
  - f. Permit section under which the filing is made
  - g. Short description of the filing

3. Filings that are graphic intensive (e.g., maps, engineered drawings) must, in addition to being electronically filed, be submitted as paper copies and on CD. Paper copies and CDs should be sent to: 1) Will Seuffert, Executive Secretary, Minnesota Public Utilities Commission, 121 7th Place East, Suite 350, St. Paul, MN 55101-2147, and 2) Department of Commerce, Energy Environmental Review and Analysis, 85 7th Place East, Suite 500, St. Paul, MN 55101-2198.

The Commission may request a paper copy of any electronically filed document.

**ATTACHMENT 3**  
Map – Route Permit

