



12300 Elm Creek Boulevard
Maple Grove, Minnesota 55369-4718
763-445-5000
greatriverenergy.com

May 12, 2016

VIA ELECTRONIC FILING

Mr. Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
350 Metro Square Building
121 Seventh Place East
St. Paul, MN 55101

Re: *In the Matter of the Route Permit Application by Great River Energy and Minnesota Power for a 115 kV Transmission Line near Motley, Minnesota - Docket No. ET2, E015/TL-15-204 – Request for Minor Alterations*

Dear Mr. Wolf:

Great River Energy, on behalf of Great River Energy and Minnesota Power (“Permittees”), requests that the Minnesota Public Utilities Commission (“Commission”) approve a minor alteration of the route permitted (the “Permitted Route”) in the Route Permit issued by the Commission on March 23, 2016 for the Motley Area 115 kV Project (“Project”) pursuant to Minnesota Rule 7850.4800.

Specifically, Great River Energy requests that the Commission approve two modifications to the Permitted Route to address a landowner concern and a system requirement. A minor alteration approval is appropriate because the requested changes have impacts comparable to the impacts associated with the Permitted Route and configuration.

Background

On March 23, 2016, the Commission issued its Order Granting Certificate of Need and Issuing Route Permit for the Project.

Minnesota Power will own and construct only a small portion of the Project, including the Dog Lake Substation upgrade and the one half mile transmission line between the Dog Lake Substation to connect to the MP “24” Line. Great River Energy will own and construct the remainder of the Project.

Since issuance of the Route Permit, Great River Energy has undertaken landowner discussions and identified one area where a route adjustment would be appropriate to address impacts to human settlement. This landowner previously indicated his concerns at the public hearing on November 19, 2015 (see 12-29-15 Summary of Public Testimony, Page 11, Humphrey Remarks) and supports the change. Also, the permitted area for the 115 kV/34.5 kV Motley Substation needs to be adjusted to the east and south on Crow Wing Power's property to enable the existing substation to remain in service during construction of the new substation.

Applicable Law

A minor alteration is a change in a high voltage transmission line that does not result in significant changes in the human or environmental impact of the facility subject to the Power Plant Siting Act, Minnesota Statutes Chapter 216E. Minn. R. 7850.4800, Subp. 1. Permittees requesting a minor alteration must submit the application to the Commission. Minn. R. 7850.4800, Subp. 2. The Commission is authorized to approve a minor alteration after providing "at least a ten-day period for interested persons to submit comments on the application or to request that the matter be brought to the [C]ommission for consideration." Minn. R. 7850.4800, Subp. 2.

The Minor Alterations

Great River Energy requests two alterations in the northern portion of the Project. An overview map showing the alterations is attached as **Exhibit A**. The alterations are described in more detail below.

Minor Alteration 1 - Transmission Line

Great River Energy has had several conversations with the landowner who owns the property located in the northwest corner of the intersection of 51st Avenue SW and 132nd Street SW. This landowner is very concerned about visual impacts to his home (**Exhibit B**). The Permitted Route would physically and visually surround three sides of his property. The landowner requested that the transmission line not follow along the existing 132nd Street and 51st Avenue ROWs, and instead be re-aligned to the westerly portion of his property, immediately adjacent to a former road corridor (the former County Road 101 that was abandoned several years ago). He has agreed to allow the transmission line and its entire easement area be situated within his property boundary, thereby not encumbering any portion of the neighboring property to the west. Minor Alteration 1 would continue southerly from 51st Avenue along the west edge of his property and reconnect with the permitted route at 132nd Street SW, where the line would turn west coincident with the original Permitted Route (**Exhibit B**).

Great River Energy reviewed the landowner’s request and determined it is economically feasible, constructible, and reasonable. With the exception of 0.3 acres in additional tree loss, it will result in overall impacts similar to the original alignment. Less than one quarter of a mile of the proposed re-alignment is cross-country through grassland and a small wooded area located on property consisting of a rural residential land use. Both landowners who would be directly impacted support the proposed re-alignment. The proposed re-alignment would reduce construction costs by an estimated \$112,000, primarily because three transmission line structures would be eliminated.

Minor Alteration 2 – Motley Substation

After the Route Permit was issued, Great River Energy and Crow Wing Power completed the final plot plan of the upgraded Motley Substation. Engineers determined that the new substation would need to be shifted 250 feet east and 75 feet south, putting it partially outside of the original Permitted Route. The shift is needed to keep the existing Motley Substation in service until the Project is complete. Great River Energy therefore requests that the route be expanded to include the new substation. The new substation location is entirely on Crow Wing Power’s property and while there will be a slight increase in tree removal, overall impacts are comparable to the Permitted Route (**Exhibit C**).

Summary of Routing Factors

The routing factors identified in Minnesota Rule 7850.4100 are discussed in **Table 1**. Detailed information comparing impacts between the proposed minor alterations and the original configurations are provided in **Table 2 (Minor Alteration 1)** and **Table 3 (Minor Alteration 2)**.

Table 1. Routing Factors

Minn. R. 7850.4100		
Routing Factors	Minor Alteration 1	Minor Alteration 2
A. Human settlement	Minor Alteration 1 will minimize visual impacts to a home by routing the transmission line on just one side of the property rather than on three sides. The minor alteration will result in comparable impacts on residential property.	Minor Alteration 2 will result in comparable impacts on the existing utility property.
B. Effects on public health and safety	No additional impacts on public health and safety are anticipated.	No additional impacts on public health and safety are anticipated.

C. Effects on land-based economies	The original alignment crosses more agricultural land (1.77 acres) than the proposed Minor Alteration 1. Effects on wooded lands are slightly higher (0.3 acres) on Minor Alteration 1. No effects on mining or tourism anticipated.	Effects on wooded lands are slightly higher (0.8 acres). No effects on mining or tourism are anticipated.
D. Effects on archaeological and historic resources	No effects on cultural resources are anticipated; however, if sites are identified, Great River Energy will coordinate with the U.S. Army Corps of Engineers and the Minnesota State Historic Preservation Office. Additional Phase 1 Reconnaissance survey was conducted on the Minor Alteration 1 area (no findings).	No effects on cultural resources are anticipated. However, if sites are identified, Great River Energy will coordinate with the U.S. Army Corps of Engineers and the Minnesota State Historic Preservation Office.
E. Natural environment	Minor Alteration 1 is not expected to increase impacts to air quality, rivers, lakes, streams, flora or fauna. Minor Alteration 1 will result in more impacts to trees (approximately 0.3 additional acres – see Table 2).	Minor Alteration 2 is not expected to increase impacts to air quality, rivers, lakes, streams, flora or fauna. Minor Alteration 2 will result in more impacts to trees (approximately 0.8 additional acres – see Table 3).
F. Effects on rare and unique natural resources	No additional impacts on rare and unique natural resources are anticipated for the proposed minor alteration.	No additional impacts on rare and unique natural resources are anticipated for the proposed minor alteration.
G. Design options that maximize energy efficiencies, mitigate adverse environmental effects and accommodate expansion	Not applicable	Not applicable
H. Use or paralleling of existing rights-of-way, survey lines, natural division lines, and agricultural field boundaries	Minor Alteration 1 utilizes about 390 feet of abandoned road ROW; the original alignment utilizes about 1724 feet of road ROW.	Not applicable
I. Use of existing large electric power generating plant sites	Not applicable	Not applicable
J. Use of existing transmission line rights-of-way	Neither Minor Alteration 1 nor the existing alignment follows existing transmission line ROW.	Not applicable
K. Electrical system reliability	Both configurations will enable reliable transmission of electricity.	Both configurations will enable reliable transmission of electricity.
L. Costs	Minor Alteration 1 is estimated to cost about \$112,000 less than the original alignment.	Minor Alteration 2 will create no known changes in cost at this time.

Table 2. Minor Alteration 1/Original Alignment Resource Details ^a

Transmission Line	Units	Minor Alteration 1	Original Alignment
Total Length	Feet	824	1,724
	Miles	0.16	0.33
Length parallel to existing ROWs, survey lines, natural division lines, and ag field boundaries	Feet	390	1,724
	Miles	0.07	0.33
Use of existing transmission line ROW	Feet	0	0
	Miles	0	0
Roads Crossed	Number	2	1
Parcels Crossed	Number	3	2
Residences within 150 feet of Transmission Line	Number	2	0
Wetlands Crossed	Number	0	0
Wood Land Impacted	Acres	0.3 acres near home 288' X 50'	None
Agricultural Land Impacted	Acres	None	1.77 acre 1,539' X 50' on inner side of alignment
Developed Land Impacted	Acres	None	None
Forested Wetlands Impacted	Acres	None	None
Open Land Impacted (Grassland)	Acres	1.36 acre	2.1 acre Highway ROW not fields

^a<https://gisdata.mn.gov/dataset/biota-landcover-gap>

Table 3. Minor Alteration 2/Original Substation Resource Details^a

Motley Substation	Units	Minor Alteration 2	Original Configuration
Total Area	Feet Miles	200x350 1.5acres	200x350 1.5acres
Length parallel to existing ROWs, survey lines, natural division lines, and ag field boundaries	Feet Miles	200	550
Use of existing transmission line ROW	Feet Miles	200 0	200 0
Roads Impacted	Number	1	2
Parcels Impacted	Number	1	1
Residences within 150 feet of Substation	Number	0	0
Wetlands Impacted	Number	0	0
Wooded Land Impacted	Acres	1.1	0.3
Agricultural Land Impacted	Acres	None	None
Developed Land Impacted	Acres	None	0.1
Forested Wetlands Impacted	Acres	None	None
Open Land Impacted (Grassland)	Acres	0.4	1.1

^a<https://gisdata.mn.gov/dataset/biota-landcover-gap>

Notice

Great River Energy has developed a landowner list (**Exhibit D**) identifying those landowners within and immediately adjacent to the ROW for the proposed minor alterations. They have been copied on this submittal.

Conclusion

Great River Energy believes the proposed minor alterations will not significantly change the impacts of the Project on humans or the environment and should be approved. While Minor Alteration 1 will result in additional tree removal, the following factors support granting the request:


- Shorter transmission line length;
- Use of existing property boundaries;
- Less agricultural land impacted;
- Proximity to a residence on one side instead of three sides; and
- Decreased construction costs.

Minor Alteration 2 will result in some additional tree removal, but will enable the existing Motley Substation to remain in service during construction and will not impact any new landowners.

Great River Energy respectfully requests that the Commission approve this minor alteration request. Please contact me at (763) 445-5215 if you have any questions regarding this filing.

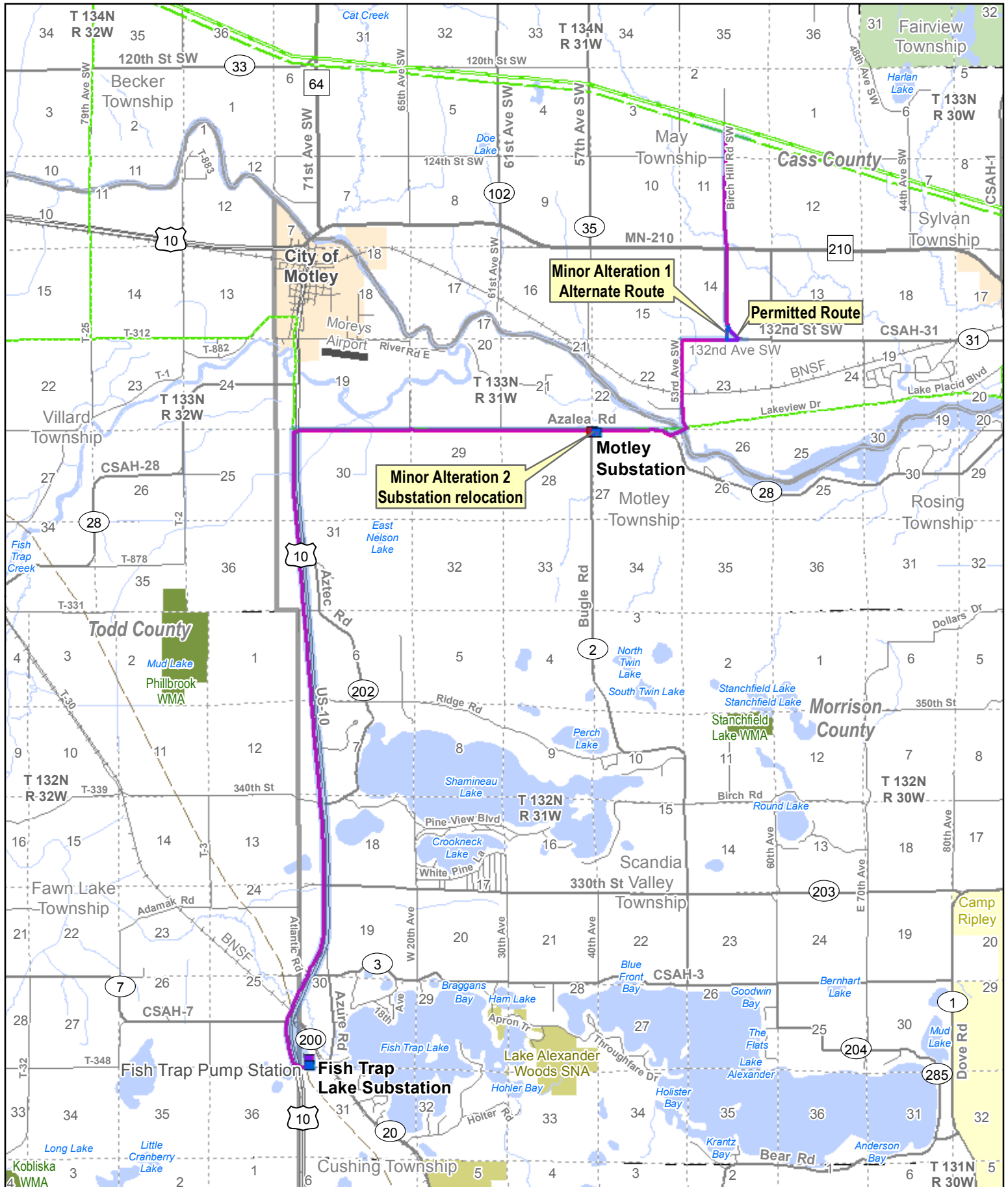
Sincerely,

GREAT RIVER ENERGY



Marsha Parlow
Transmission Permitting Analyst

Attachments: **Exhibit A** – Map Showing Minor Alteration Requests
Exhibit B – Minor Alteration 1 Map
Exhibit C – Minor Alteration 2 Map
Exhibit D – Affected Landowner List



- Great River Energy
- Anticipated alignment 115 kV transmission line
- Proposed alignment - Minor Alteration 1
- Original alignment
- Permitted route
- Alternate route - Minor Alteration 1

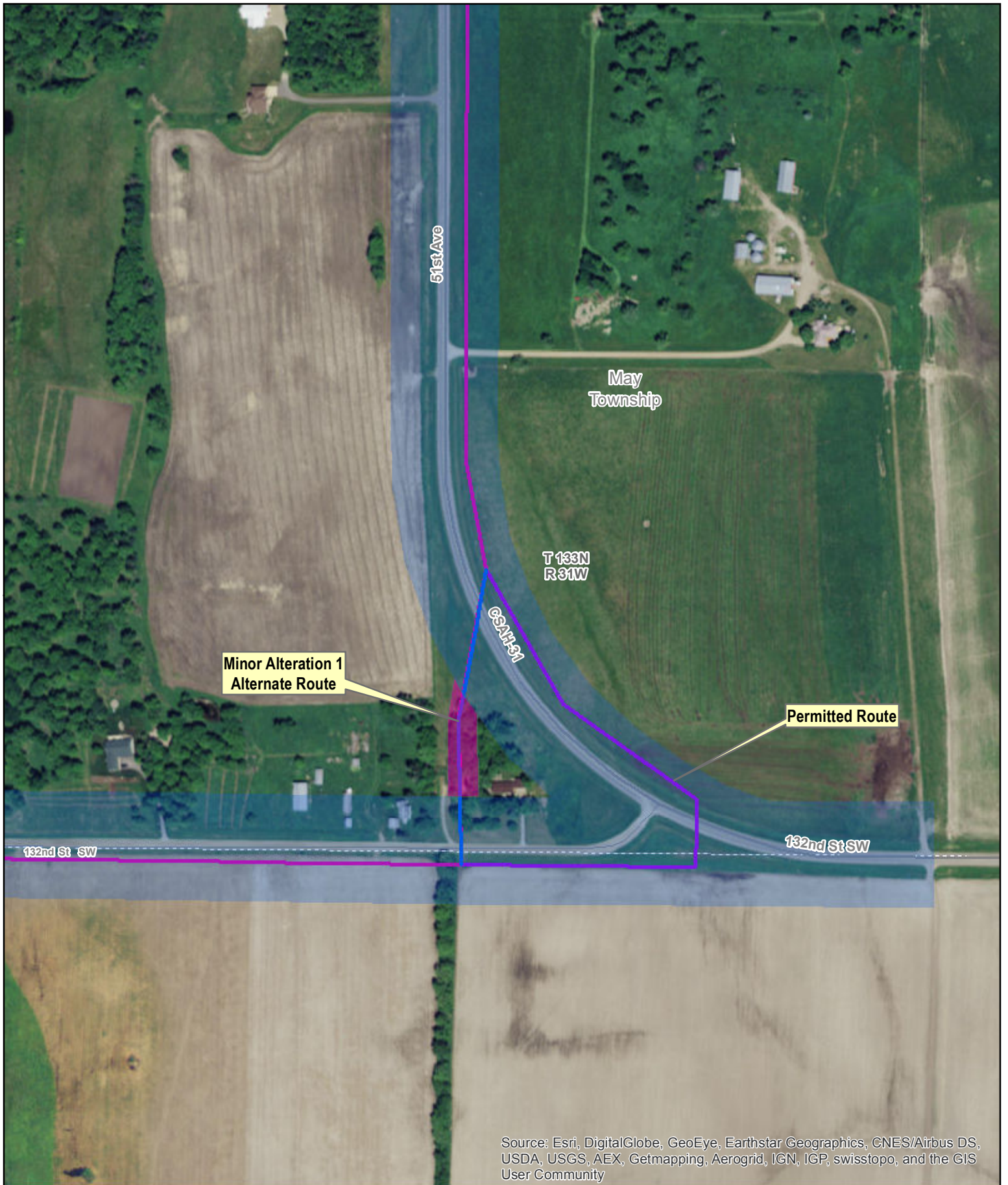
- Minnesota Power
- Existing 34.5 kV transmission line
- Existing 115 kV transmission line
- Existing 230 kV transmission line
- Crow Wing Power
- Proposed substation - Minor Alteration 2
- Existing substation

- Minnesota Pipe Line
 - Proposed pump station
 - Existing pipeline
- GIS data sources: MNGEO, MNDNR, MNDOT, and Great River Energy
- 0 1 2 Miles



Updated: 5/12/2016

Motley Area 115 kV Project Route Permit Minor Alterations Exhibit A



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

- Great River Energy
- Anticipated alignment 115 kV transmission line
 - Proposed alignment - Minor Alteration 1
 - Original alignment
 - Permitted route (300 feet)
 - Alternate route - Minor Alteration 1

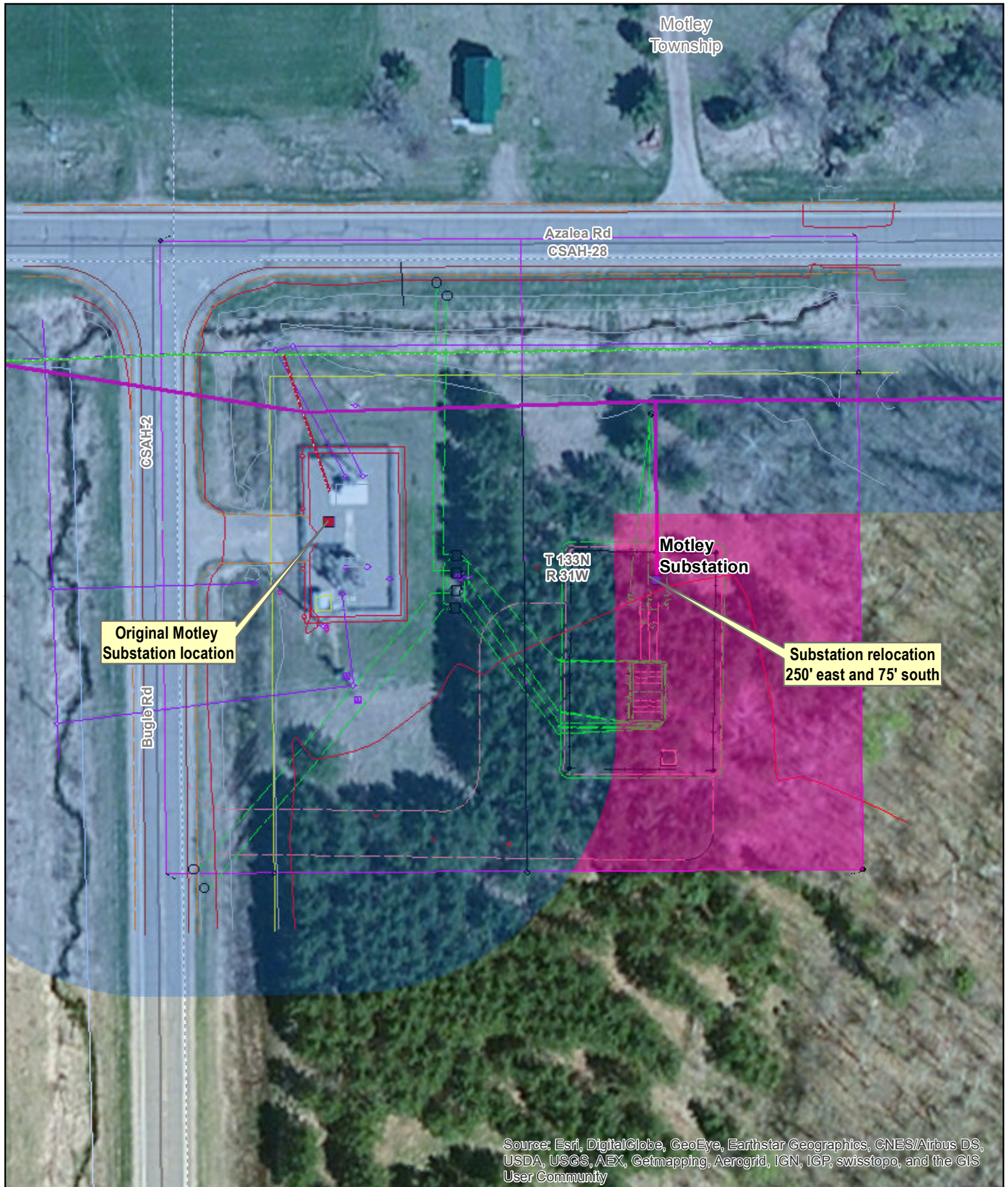
GIS data sources: MNGEO, MNDNR, MNDOT, and Great River Energy

0 250 500 Feet

Updated: 5/12/2016



**Motley Area
115 kV Project
Route Permit
Minor Alteration 1
Exhibit B**



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

- | | |
|---|---|
| Great River Energy | Crow Wing Power |
| — Anticipated alignment 115 kV transmission line | ■ Proposed substation |
| — Permitted route/substation area | ■ Existing substation |
| — Additional substation area - Minor Alteration 2 | |
| Minnesota Power | |
| - - - Existing 34.5 kV transmission line | |

GIS data sources: MNGEO, MNDNR, MNDOT, and Great River Energy

0 50 100 Feet

Updated: 5/12/2016



**Motley Area
115 kV Project
Route Permit
Minor Alteration 2
Exhibit C**

EXHIBIT D

PATRICK & LAURIE HUMPHREY
5088 132ND STREET SW
PILLAGER, MN 56473

BRADLEY & LAVONNE VAN VICKLE
13025 51ST AVE SW
PILLAGER, MN 56473

SHIRLEY HYNES
911 13TH STREET SW
LITTLE FALLS, MN 56345

ANGELINE GILLSON
PO BOX 245
PILLAGER, MN 56473

GRAND VIEW RANCH, LLC
NEAL GAALWYCK
11745 MAPLE WOOD DRIVE
EAST GULL LAKE, MN 56401

CROW WING POWER
ERIC QUALE
HIGHWAY 371 NORTH
PO BOX 507
BRAINERD, MN 56401-0507

DALE & EMILIE PETERSON
2830 FLORENCE COURT NW
BEMIDJI, MN 56601