STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
David C. Boyd	Commissioner
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
Betsy Wergin	Commissioner

In the Matter of the Great River Energy Route Permit for the Enterprise Park - Crooked Lake High Voltage Transmission Line Project in Anoka County, Minnesota	Docket No. ET2/TL-11-915

JOINT REQUEST TO TRANSFER ROUTE PERMIT

In accordance with Minnesota Rule 7850.5000 and the Route Permit for Construction of a High-Voltage Transmission Line and Associated Facilities in Anoka County, Minnesota (Route Permit) issued by the Minnesota Public Utilities Commission (Commission) on August 24, 2012, Great River Energy (GRE) and MMPA Transmission LLC (MMPAT) (GRE and MMPAT collectively, Joint Applicants) jointly request that the Commission transfer this Route Permit from GRE to MMPAT effective as of the date of the closing of the sale of the transmission line assets that are the subject of the Route Permit by GRE to MMPAT, which the Joint Applicants desire to be no later than December 13, 2014.

A. Executive Summary

Permittee:	Great River Energy
Proposed New Permittee:	MMPA Transmission LLC, a Minnesota limited liability company and a wholly-owned subsidiary of Minnesota Municipal Power Agency, a municipal power agency and Minnesota municipal corporation organized pursuant to Minn. Stat. §§ 453.51 et seq.
Description of facilities:	Approximately 5.8 mile 115-kV transmission line and associated facilities that interconnect the existing Crooked Lake Substation in Coon Rapids, Minnesota, with the existing Enterprise Park Substation in Anoka, Minnesota (Transmission Line)

Reason for transfer:	MMPAT is purchasing the Transmission Line and associated assets that are the subject of the Route Permit
Proposed effective date of transfer:	On or before December 13, 2014

B. Description of GRE

GRE is a not-for-profit electric generation and transmission cooperative serving the wholesale power needs of 28 member distribution cooperatives, who in turn supply electricity to nearly 645,000 customers in Minnesota and a portion of western Wisconsin. GRE is a transmission-owning member of the Midcontinent Independent System Operator, Inc. (MISO) and owns approximately 4500 miles of transmission lines in Minnesota, North Dakota, South Dakota and Wisconsin.

C. Description of MMPAT

MMPAT is a Minnesota limited liability company and a wholly-owned subsidiary of Minnesota Municipal Power Agency (MMPA). MMPA is a municipal power agency and Minnesota municipal corporation organized pursuant to Minn. Stat. §§ 453.51 et seq. MMPA consists of 12 member Minnesota municipal distribution utilities and currently provides electricity to 11 of those members, who in turn serve about 69,000 commercial and residential customers in Minnesota. MMPA has been participating in the MISO markets since MISO's formation and, in February 2013, became a transmission-owning member of MISO. MMPA has been a registered entity with North American Electric Reliability Corporation (NERC) since May 30, 2007. As of February 19, 2010, MMPA undertook the responsibility for complying with NERC reliability requirements/sub-requirements associated with the transmission owner (TO) function.

MMPAT was formed for the purposes of owning all of MMPA's transmission assets. MMPA will assign all of its rights and obligations under the MISO Transmission Owner Agreement to MMPAT such that MMPAT will become the transmission-owning member of MISO. MMPAT will designate MMPA as the entity responsible for compliance with the TO function on behalf of MMPAT such that MMPA will remain the registered entity for NERC purposes.[1]

D. Background

On October 3, 2011, GRE, on behalf of itself, MMPA, Xcel Energy and Anoka Municipal Utility (AMU), submitted an application for a route permit for the proposed new approximately 5.8 mile 115-kV transmission line and associated facilities to interconnect the existing Xcel Energy Crooked Lake Substation in Coon Rapids, Minnesota, with the existing AMU Enterprise Park Substation in Anoka, Minnesota (Transmission Line). The overall project also included attaching AMU's distribution lines to the new 115-kV line (or burying them), and modifying the substations. On August 24, 2012, the

[1] The Midwest Reliability Organization (MRO) has determined that the Transmission Line is not part of the Bulk Electric System (as such term is defined by NERC) and, therefore, is not subject to the NERC reliability requirements/sub-requirements associated with the TO function.

Commission issued the Route Permit authorizing GRE to construct the Transmission Line and associated facilities. As reported to the Commission, GRE completed construction of the Transmission Line on August 29, 2014. On October 14, 2014, GRE energized the Transmission Line, however the line is not currently carrying load due to the need for AMU to complete work on certain AMU facilities located in the Enterprise Park Substation to allow the transfer of AMU load from the 69 kV system to the new 115 kV facilities. AMU has indicated that its work will be complete by the end of November.

GRE and MMPAT executed an Asset Purchase Agreement dated December 13, 2013, whereby MMPAT agreed to purchase the Transmission Line from GRE. The parties desire to close the transaction no later than December 13, 2014. One of the requirements for closing on the transaction is that GRE transfer the Route Permit to MMPAT. In requesting the transfer of the Route Permit, GRE and MMPAT do not seek any changes to the terms or conditions of the Route Permit. Effective as of the closing of the transaction, MMPAT will assume responsibility for the applicable compliance obligations under the Route Permit as described below. GRE will no longer own the Transmission Line, but will act as a service provider to MMPAT. GRE and MMPAT executed a Maintenance Services Agreement effective October 3, 2014, whereby GRE agreed to perform ongoing maintenance and engineering services in connection with the Transmission Line.[2]

E. MMPAT's Compliance with the Route Permit

1. Sections 4.1-4.3, 4.6, 4.8.3, 4.8.4, 4.9, 4.10, 5.1, 5.2: Conditions No Longer in Effect

As the existing Permittee, GRE was responsible for compliance with the Route Permit during design and construction. *See* Route Permit §§ 4.1-4.3, 4.6, 4.8.3, 4.8.4, 4.9, 4.10, 5.1, 5.2. On October 7, 2014, GRE notified the Commission of the completion of construction and energization of the Transmission Line. GRE will be supplying GPS data (§ 4.6.3), and as-built plans and specifications (§ 4.6.2) to the Commission by the end of November, 2014. Joint Applicants submit that because construction is complete, the conditions set forth in Sections 4.1 through 4.3 and 4.6, 4.8.3, 4.8.4, 4.9, 4.10, 5.1 and 5.2 of the Route Permit are no longer applicable and do not require MMPAT demonstrate its ability to comply with such conditions.

2. *Sections 4.4 – 4.5: Complaint Procedures and Landowner Notification*

In accordance with Section 4.4 of the Route Permit, GRE submitted its complaint procedures to the Commission. GRE has also provided the affected landowners with all the information required by the first paragraph of Section 4.5. GRE reported any complaints received as part of its periodic status reports to the Commission. All complaints received as of the date of this request have been resolved. MMPAT[3] will contact landowners, or arrange for contact of landowners, prior to it, or its contractors, entering the property or conducting maintenance along the route. *See* § 4.5.

3. Section 4.7: Electrical Performance Standards

Section 4.7.1 requires:

[2] MMPA executed both the Asset Purchase Agreement and the Maintenance Services Agreement with GRE; however, MMPA assigned both of these contracts to MMPAT effective June 24, 2014 and October 28, 2014, respectively.
[3] MMPAT, or the entity with whom it has contracted to perform maintenance services, will contact landowners.

> The Permittee [to] design, construct, and operate the transmission line in a manner that the maximum induced steady-state short-circuit current shall be limited to five milliamperes (mA), 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 mA rms under steady state conditions of the transmission line and to comply with the ground fault conditions specified in the NESC. The Permittee shall address and rectify any induced current problems that arise during transmission line operation.
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> Section 4.7.2 requires:
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> The transmission line shall be designed, constructed, and operated 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.

GRE designed and constructed the Transmission Line to conform to these requirements; MMPAT will operate the Transmission Line in accordance with these requirements. As previously noted, MMPAT has contracted with GRE to perform all maintenance and engineering services in connection with the Transmission Line. In addition, MMPAT commits to take the necessary actions that are prudently feasible to restore or provide reception for communication devices equivalent to reception levels in the immediate area just prior to the construction of the Transmission Line. *See* § 4.7.3.

4. Section 4.8: Other Requirements

Section 4.8.1 requires the Permittee to comply with a number of applicable codes during design and construction. GRE was responsible for compliance with these conditions of the Route Permit. MRO has determined that the Transmission Line is not part of the Bulk Electric System and, therefore, is not subject to the NERC reliability requirements/sub-requirements associated with the TO function. *See* footnote 1, above.

Section 4.8.2 requires the Permittee to obtain and comply with all required local, state and federal permits. GRE was responsible for obtaining and complying with such permits during design and construction. Upon closing on the transaction, all ongoing local, state and federal permits and licenses applicable to the Transmission Line will be transferred or assigned to MMPAT. MMPAT will comply with such permits and licenses as they are applicable to the ownership and operation of the Transmission Line.

F. Requested Commission Action

For the reasons stated herein, Joint Applicants respectfully request the Commission authorize the transfer of the Route Permit issued in the above-captioned proceeding from GRE to MMPAT effective no later than December 13, 2014.

Dated: October 29, 2014

Respectfully submitted,

GREAT RIVER ENERGY

/s/ Donna L. Stephenson
Donna Stephenson
Associate General Counsel
12300 Elm Creek Boulevard
Maple Grove, MN 55369

MMPA TRANSMISSION LLC

/s/ James D. Larson
James D. Larson
President
c/o Avant Energy, Inc.
220 South Sixth Street, Suite 1300
Minneapolis, MN 55416