



GREAT RIVER
ENERGY®

A Touchstone Energy® Cooperative

12300 Elm Creek Boulevard • Maple Grove, Minnesota 55369-4718 • 763-445-5000 • 763-445-5050

24 September 2014

Dr. Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

**Re: *In the Matter of the Route Permit Application for the Savanna 115 kV Transmission Line in St. Louis and Carlton Counties, Minnesota*
Request for a Minor Alteration
MPUC Docket No. ET2, E015/TL-10-1307**

Dear Dr. Haar:

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 Permit for the Savanna 115 kV line project (“Project”) pursuant to Minnesota Rules Chapter 7850.4800.

Specifically, Great River Energy requests a modification to the approved route east of Structures 27 through 30 (see Figure 1, Appendix A) to address stakeholder concerns.

Great River Energy believes a minor alteration to the Route Permit is appropriate because the requested route modification has impacts comparable to the impacts associated with the initially approved route (see Figure 1, Table 1, and Table 2, Appendix A).

BACKGROUND

On March 7, 2012, the Commission issued a Route Permit for the 37-mile 115 kV transmission line in St. Louis and Carlton Counties, Minnesota.

Per Route Permit Condition 4.1, a plan and profile is required to start construction. The plan and profile was submitted in phases to facilitate outage and winter construction timelines:

On November 2, 2012, Commission granted approval to proceed with construction between LC-CVT Structures 1 and 92 (Cedar Valley Substation to Savanna Substation).

On October 28, 2013, Commission granted approval to proceed with construction between LC-CSX Structures 108 and 331 (Cromwell City Substation to Gowan Bulk Substation).

On April 17, 2014 Commission granted approval to proceed with construction between LC-CS Structures 1 and 331 (Gowan Bulk Substation to Savanna Substation).

On September 18, 2014, Commission granted approval to proceed with construction between LC-CSX Structures 33 and 108 (Cromwell Bulk Substation to Cromwell City Substation, Plan and Profile Sheets 4 through 8).

On September 19, 2014, Great River Energy submitted Plan and Profile for approval to proceed with construction between LC-CSX Structures 1 and 18 (Cromwell Bulk Substation to Cromwell City Substation, Plan and Profile Sheets 1 and 2).

On September 24, 2014, Great River Energy filed the plan and profile (filing letter, maps and agencies updates - Submission No. 20149-103273) for LC-CSX Structures 18 through 33 (Cromwell Bulk Substation to Cromwell City Substation, Plan and Profile Sheet 3) with the minor alteration incorporated, but with a note that separate Commission approval is necessary beyond the plan and profile.

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 Plan Siting Act (Minn. Stat. Ch. 216E). Permittees requesting a minor alteration must submit the application to the Commission. Minn. R. 7850.4800. 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.

MINOR ALTERATION BETWEEN STRUCTURES 27 AND 30

During the easement acquisition process, Great River Energy identified an area that would need to be outside the permitted route (Structures (27A, 28, 28A, 29, and 29A) to address stakeholder concerns. An expanded route width is necessary to accommodate a landowner’s request to relocate the transmission line behind some buildings of concern in the area. The new location of structures was discussed with all landowners impacted by the proposed shift and all are in favor of the new alignment.

Great River Energy respectfully requests the Commission approve the following alignment and changes outside the initially approved route:

- Add three new structures (Structures 27A, 28A and 29A) and move two existing structures (Structures 28 and 29) outside the approved route (see Figure 1, Appendix A).

These modifications result in overall impacts (relative to the factors in Minnesota Rule 7850.4100) comparable to the impacts associated with the initially approved route (see Table 1, Table 2 and Figure 1, Appendix A).

CONCLUSION

Great River Energy believes the proposed minor alteration does not significantly change the impacts of the Project on humans or the environment and request that the Commission approve this minor alteration request. Specifically, the Great River Energy requests that the route be adjusted as shown on enclosed Figure 1 (see Appendix A).

Please contact me if you have any questions regarding this filing.

Sincerely,

GREAT RIVER ENERGY



Marsha Parlow
Transmission Permitting Analyst

c: Bill Storm, Department of Commerce
Michelle Lommel, Great River Energy

Appendix A

Figure 1

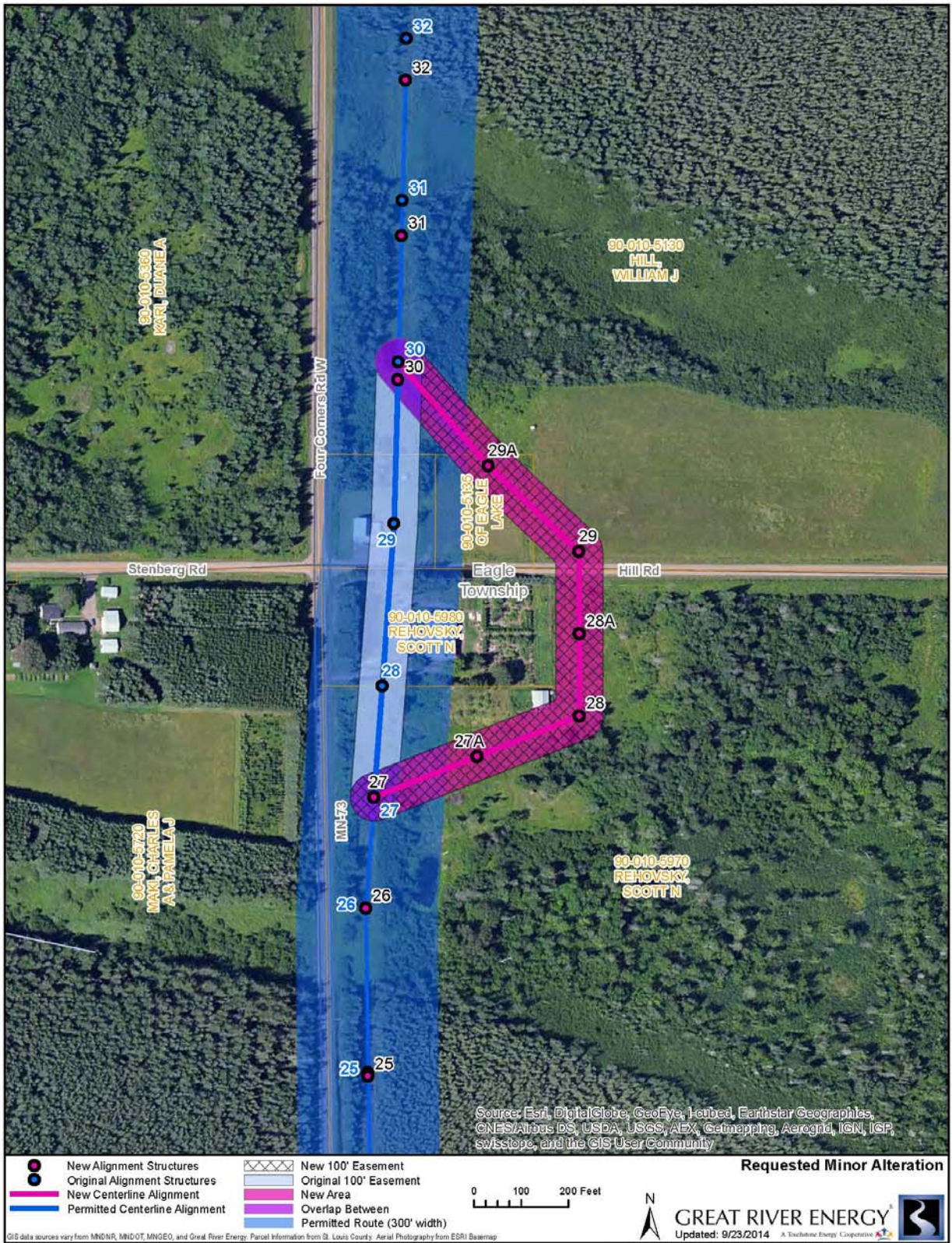


Table 1 Savanna Transmission Line Project Between Structures 27 and 30				
	Units	Permitted Route Between Structures 27 and 30	Requested Minor Alteration Between Structures 27 and 30	Difference
Total Length	Feet	924	1,347	423
Length Parallel to Existing Rights-of-Way	Feet	924	0	-924
Roads Crossed	Number	1	1	0
Parcels Crossed	Number	4	3	-1
Residences within 150 feet of the Transmission Line	Number	2	0	-2
Wetlands Crossed	Number	0	0	0
Land Use^a				
Crop/Grass Crossed	Acres	2.12	3.06	0.94
Lowland Deciduous Forest Crossed	Acres	0	0	0
Shrubland	Acres	0	0	0
Upland Deciduous Forest Crossed	Acres	0.1	0.27	0.17

^a Data based on <http://deli.dnr.state.mn.us/metadata.html?id=L390000102101>
Wetland boundaries based on National Wetland Inventory Maps.

Table 2 Comparison of the Minor Alteration between Structures 27 and 33	
Human settlement	The requested minor alteration will have a lesser impact on human settlement than the permitted route.
Existence and density of populated areas	The requested minor alteration will impact less populated areas.
Existing and planned future land use	The requested minor alteration crosses similar land uses as the permitted route and it will be returned to as near to its preconstruction condition as practical. Damages will be restored or compensation provided to the landowners.
Natural environment	The requested minor alteration will not impact additional wetland areas outside of the permitted route; however will shift more onto crop/grassland areas and forested areas.
Public and designated Lands (including but not limited to natural areas, wildlife habitat, water, recreational lands),	The requested minor alteration will not have any additional impact on these categories of land.
Lands of historical archeological, and cultural significance	The requested minor alteration will not impact any of these lands.
Economies within the alternative, such as agricultural, commercial or industrial, forestry, recreational, and mining operations	The requested minor alteration will have additional impact on fields; however, there will be less impact on the people.
Transmission line cost and accessibility	<p>There will be additional transmission line costs as shown below:</p> <p>Original Route Cost (#27-30) - \$78K (4 single pole tangent/small angle structures)</p> <p>Reroute Cost (#27-30) - \$212K (3 2-pole deadend, 1 2-pole angle, 3 single-pole tangents)</p> <p>Additional Estimated Reroute Cost (Construction) - \$134K. This does NOT include engineering costs.</p> <p>Accessibility should be similar because the minor alteration shifts it closer to other roads/driveways in the area.</p>
Use of existing rights-of-way and rights-of-way sharing or paralleling	The transmission line, once installed, will not continue to parallel close to the right-of-way of the existing 69 kV transmission line; however, it was requested by the landowners and will stay along property lines.
Natural resources and features	The requested minor alteration will require removal of some additional trees; however, the impact should be minimal.

Great River Energy

Appendix A

Docket No. ET-2, E015/TL-10-1307

September 24, 2014

Extent to which impacts are subject to mitigation through regulatory control and permit conditions	The same regulatory controls, mitigation measures and permit conditions will apply to the requested minor alteration..
Cumulative potential effect of related or anticipated future transmission line construction	No change.