

From: Marie C. Boucher
To: Jim Sullivan
Cc: Sullivan, Jim (OAH); janezich, Craig (DNR)
Subject: Discrepancies in Great River Energy Route Requests E015 OAH Docket No 21-2500-39822 attachment D. Attn: Will Seuffert
Date: Sunday, November 17, 2024 2:59:40 PM
Attachments: [Redacted]

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Me, Will Seuffert.

Please have the Minnesota Public Utilities Commission take a close look at the Cole Lake Way area prior to making their final decision on the project's route. It's stated it is feasible to stay on the main right of way without affecting the residents in the area (AA4/AA3 combination), and AA6 has not been supported. Yet the final modified route submitted September 19 by the applicants, still has their proposed route following the AA6 pathway through the Cole Lake Way homeowners property as opposed to staying on the main transmission line right of way (AA4/AA3)!
North and south of our area, the route follows a straight path along the existing ROW; yet diverts only thru our small neighborhood for a small segment of the route, then looks back up to the main line again. There seems no reason for this diversion and disruption, when it's perfectly safe, feasible and less impactful to stay on the existing ROW this short distance.

Please, the route needs to stay along the existing transmission line ROW in the Cole Lake Way segment and not cut new pathways through our properties and disrupt our neighborhood!

Thank you in advance for the added attention to this issue.

Don and Marie Boucher
Cole Lake Way neighborhood homeowners.

See attached:

Begin forwarded message:

From: "Marie C. Boucher" <mboucher.pers@icloud.com>
Date: November 10, 2024 at 4:36:11 PM CST
To: Jim Sullivan <jim.sullivan@state.mn.us>; craig.janezich@state.mn.us
Subject: Discrepancies in Great River Energy Route Requests E015 OAH Docket No 21-2500-39822 attachment D

Hello Jim and Craig,

We have recently reviewed the findings and summary of Administrative Law Judge Kimberly Middendorf. Yet it still leaves us in confusion regarding our area.

In the previous E015 OAH Docket No 21-2500-39822 attachment D PAGE 4, it stated AA4 (which kept the new transmission line on the existing lines ROW) was not preferred by the applicants because alignment alternative AA3 is a more comprehensive solution for the area to maximize co-location.

It also stated, AA6 (which diverts off the existing ROW through our property and neighborhood) is not supported by the applicants because it is located closer to residences.

It continues to clarify the "Proposed route with modifications" includes response from public and includes alignment alternative AA3. Yet this is the one that diverts through our property and neighborhood which we all have been expressing concern since day one.

The applicant's final request Docket 22-415 20249-210355 dated 9-19-2024 contradicts that. See their two maps attached.

It's the applicant's Co-location map that includes the AA3 (keeping it along the existing ROW) not their Modified proposed map (which still has it diverting off the main transmission line ROW through our property and neighborhood). Even though they say it's not a preferred route!

In one sentence they say they are proposing the Co-location maximization route, yet on the other hand they are wanting their Modified Proposed Route approved as if they are one in the same.

If the applicant is seriously planning to proceed with the Co-location Maximization Route in the Cole Lake region, why are they requesting a one mile route ROW?

If the applicant is seriously planning to proceed with the Co-location Maximization Route in the Cole Lake region, why are they needing expanded route width?

The applicants states for flexibility to avoid impact on residence and landowner comments. If it stayed on the existing ROW with Co-location, there would be no need for any additional route width.

Please look at this closely. If the Co-location route truly is preferred, then that route should be granted. If the Modified proposed route is beneficial in other areas, include stipulations to stay with the AA3 alternative in the Cole Lake Region and Co-locate.

We realize this is a 180 mile project and our area is a small portion of it. The decision of the final route on the project however, will have a significant impact on our future. The applicants seem to be saying one thing but wanting to do another and hoping you will grant them the option to do so.

Thank you for your time and consideration,

Don and Marie Boucher

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construction and maintenance concerns and costs), and deviates from following existing transmission line rights-of-way.

Alignment Alternative AA2: Alignment alternative AA2 is not supported by the Applicants due to its short length and because there are other alignment alternatives that would address the concerns raised in this area. Further, Applicants note that the modified alignment alternative AA1 included in Applicants' Modified Proposed Route and Co-location Maximization Route is intended to be responsive to the concerns of the landowner proposing alignment alternative AA2.

Cole Lake/Riverton Region:

Alignment Alternative AA4: Alignment alternative AA4 is a portion of Applicants' Cole Lake Way Alignment Alternative (alignment alternative AA3). Alignment alternative AA4 is not preferred by the Applicants as alignment alternative AA3 is a more comprehensive solution for this area to maximize co-location.¹

Alternative Alignment AA6: This alignment is not supported by the Applicants because it is located closer to residences.

Route Alternative D3: This alternative alignment was considered by the Applicants prior to filing the Application and was rejected at that time.² This route alternative would add new greenfield right-of-way when more of the existing transmission facilities in the area can be followed by the Modified Proposed Route. Additionally, this route alternative would cross through the former mining ghost town site of Manganese.

Route Alternative E2: Route alternative E2 is not supported by the Applicants, due to the impacts to public and private property from the diagonal alignment, potential impacts to a communication tower, and has additional residential impacts.

¹ Applicants' August 5, 2024 Comment Letter at Attachment 2 (eDocket No. 20248-209266-02).
² Application at Section 5.3.4.

The Sherco Solar Alignment Alternative Route exceeds the overall cost of the Project by approximately \$0.6 million.

B. Full Route Options

134-136. The full route options identified in the EA were compiled by selecting routing alternatives or alignment alternatives within each region that could be feasibly connected to one another to create a full transmission line route between the existing Iron Range Substation, a new Cuyuna Series Compensation Substation, the existing Benton County Substation, the existing Sherco Substation, and the new Big Oaks Substation. The EA analyzed seven full route options against each other to provide the opportunity to understand what impacts might look like if one of these full routes, or a similar route, were chosen for the Project.²¹¹

132-137. The Applicants' Proposed Route is the route proposed by the Applicants in the Application (See Figure 1).

133-138. The Applicants' Proposed Route with Modifications includes modifications proposed by the Applicants in response to public comments and includes routing alternatives that would further consolidate the proposed new double-circuit 345 kV transmission line with existing transmission lines, particularly in the Cole Lake-Riverton Region. This route includes alignment alternative AA3 and route alternative E1.²¹² See Map 1, Appendix 4, Attachment D.

134-139. Example Route Option 1. This route includes portions of the Applicants' Proposed Route, including some modifications proposed by the Applicants and routing alternatives proposed during the EA scoping comment period. This route includes route alternatives B, E1, H1 and alignment alternatives AA3 and AA16.²¹³ See Map 2, Appendix 4, Attachment D.

135-140. Example Route Option 2. Similar to Example Route Option 1, this route includes portions of the Applicants' Proposed Route, including some modifications

²¹¹ Ex. EERA-9, Section 7.1-7.2 (EA) (eDocket No. [20246-208129-06](#)); DOC-EERA

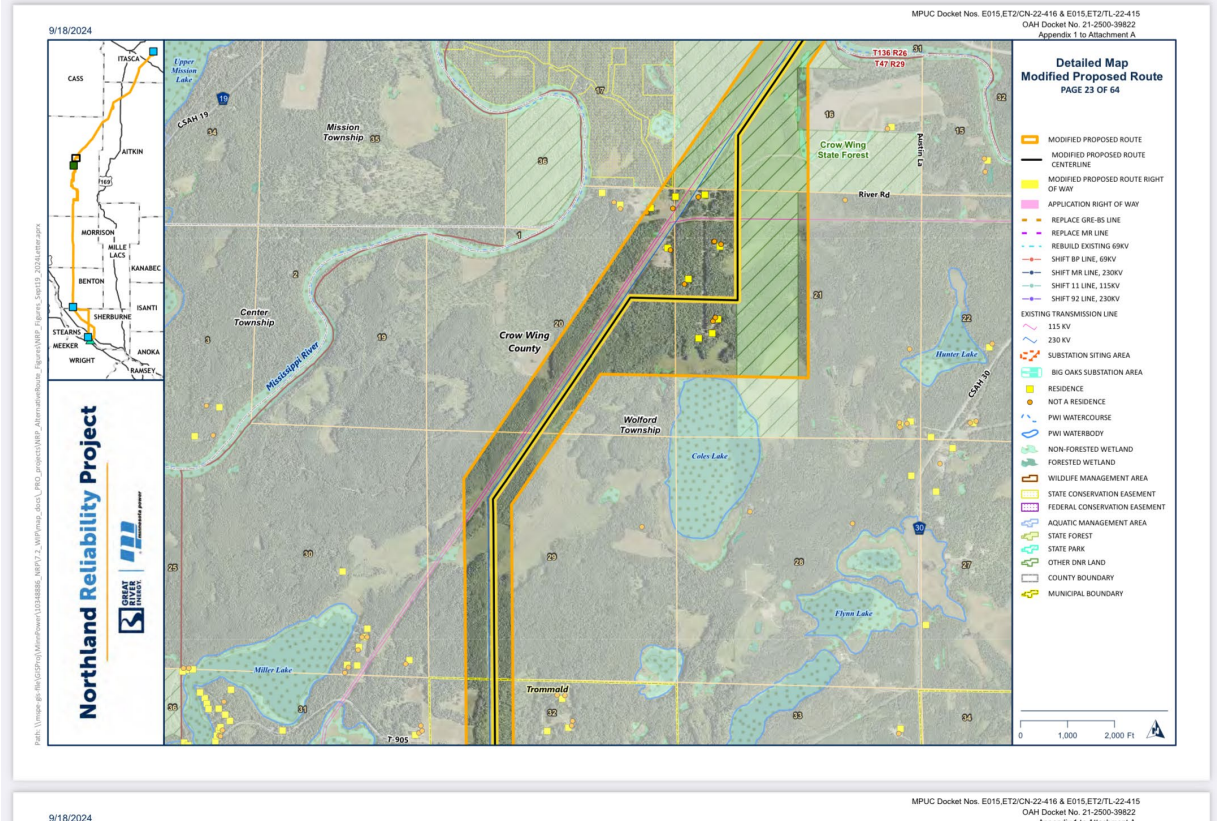
at that time as it would deviate from existing transmission line rights of way and cross through a former mining ghost town site.¹³²

101. Alignment alternative AA3 would consolidate Minnesota Power's existing 11 Line (115 kV) and 92 Line (230 kV) on the same structures for approximately five miles in Wolford Township in Crow Wing County within the Modified Proposed Route width north of the proposed Cuyuna Series Compensation Station and enable placement of the Project on the right-of-way currently used by Minnesota Power's 92 Line in this area (See Map 3b, Appendix 3, Attachment D).¹³³ The Applicants have incorporated alignment alternative AA3 into the Co-location Maximization Route.¹³⁴ Alignment alternative AA3 would increase the mid-range cost of the Project by approximately \$29.2 million.¹³⁵

97-102. Alignment alternative AA4 is a shorter version of alignment alternative AA3. Alignment alternative AA4 would double-circuit two existing transmission lines so that the Project could be constructed within existing transmission line right-of-way. Alignment alternative AA4 is approximately 0.8 miles long.¹³⁶ Alignment alternative AA4 is not preferred by the Applicants as alignment alternative AA3 is a more comprehensive solution for this area to maximize co-location with existing high-voltage transmission lines.¹³⁷

98-103. Alignment alternative AA6 is 1 mile long; it would divert from the Applicants' Proposed Route north of River Road and head due south along Cole Lake Way for approximately 0.7 miles, then turn due west for 0.3 mile. Alignment alternative AA6 does not include any right-of-way sharing, paralleling, or double-circuiting; however, it would cross one existing transmission line.¹³⁸ Alignment alternative would locate the Project closer to residences than other route and alignment options in this area.¹³⁹

¹³² Applicants' September 19, 2024 Response to Public Hearing Comments at Attachment D (Sept. 19, 2024) (eDocket No. 20249-_____-__).

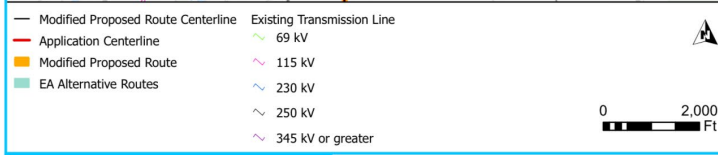
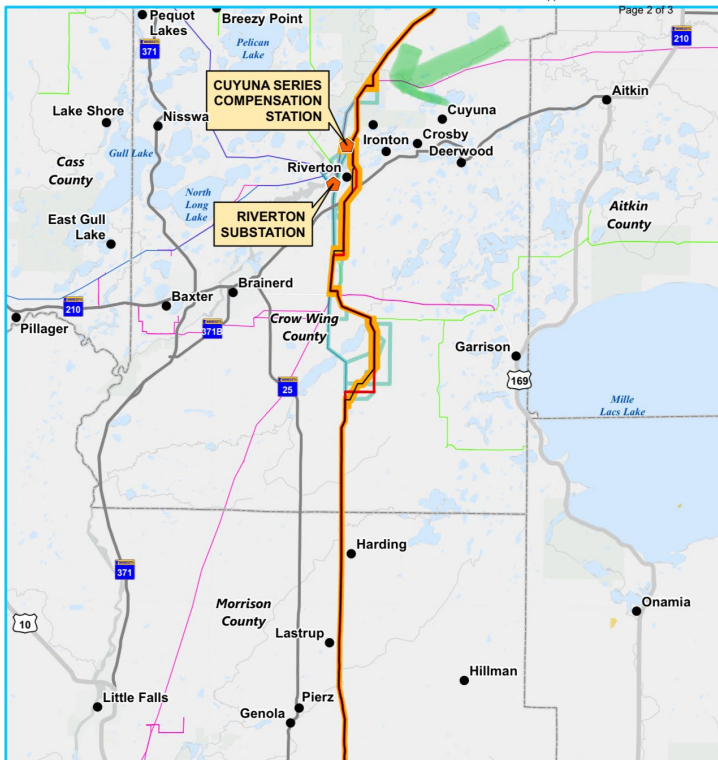


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