

**STATE OF MINNESOTA
BEFORE THE OFFICE OF ADMINISTRATIVE HEARINGS
FOR THE MINNESOTA PUBLIC UTILITIES COMMISSION**

In the Matter of the Application of
Minnesota Power for a Certificate of Need for
the HVDC Modernization Project in
Hermantown, Saint Louis County;

In the Matter of the Application of
Minnesota Power for a Route Permit for a
High Voltage Transmission Line for the
HVDC Modernization Project in
Hermantown, Saint Louis County.

**OAH 5-2500-39600
MPUC E-015/CN-22-607
MPUC E-015/TL-22-611**

REBUTTAL TESTIMONY OF MICHAEL BRADLEY

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I. INTRODUCTION

3 **Q. Please state your name, employer, title, and business address.**

4 A. My name is Michael Bradley. I am employed by ATC Management, Inc., the corporate
5 manager of American Transmission Company LLC (collectively, ATC). My job title is
6 Consultant Transmission Line Engineer, and my business address is 2485 Rinden Road,
7 Cottage Grove, WI 53527.

8 **Q. Are you the same Michael Bradley who filed direct testimony in this proceeding on**
9 **behalf of ATC in support of its Arrowhead Substation Alternative?**

10 A. Yes.

11 **Q. What is the purpose of your rebuttal testimony?**

12 A. My rebuttal testimony responds to the direct testimony filed by Minnesota Power (MP).
13 Specifically, my rebuttal testimony:

- 14 • Addresses concerns raised by MP regarding the crossing of existing
15 transmission lines associated with the Arrowhead Substation Alternative;

- Responds to issues raised by MP regarding the socioeconomic impacts associated with the Arrowhead Substation Alternative; and
- Addresses MP's concerns regarding outreach to permitting agencies and landowners about the revised Arrowhead Substation Alternative.

II. ROUTE PLANNING AND IMPACTS

Q. How do you respond to MP witness Mr. Winter's assertion at pp. 79-81 of his direct testimony that there is additional construction risk involved with the Arrowhead Substation Alternative because it would require that the new double-circuited 345 kV line cross the existing 250 kV HVDC Line and the Arrowhead-Bear Creek 230 kV line?

A. The planned line crossings involved in the Arrowhead Substation Alternative are neither complicated nor uncommon. The Arrowhead Substation Alternative double-circuited 345kV line will cross over the existing HVDC Line at one location and over the Arrowhead-Bear Creek line at one location. Such line crossings are common around substations, and any additional construction risk associated with those line crossings would be minimal. While the existing lines would undergo a short outage to pull in the conductors to facilitate the crossings, these short outages can easily be planned for and accommodated. It is also normal that the 345kV line (the higher voltage) would cross over the lower voltage lines.

Q. How do you respond to MP witness Mr. Gunderson's concern at p. 26 of his direct testimony that the alignment for the double-circuited 345kV transmission line included in the Arrowhead Substation Alternative changed during the planning process?

1 A. ATC revised the proposed route alignment to avoid multiple crossings of the West Rocky
2 Run Creek and to avoid a cultural resource. It is not unusual—in fact, it can sometimes be
3 completely prudent—to modify an alignment for a proposed transmission in response to
4 new or additional information. ATC’s initial route was conceptual and was submitted to
5 show there was a viable alternative route that would allow the Project to connect to the
6 existing ATC 345/230 kV Arrowhead Substation. After ATC received feedback that the
7 initial route alignment crossed the West Rocky Run Creek in several places and learned
8 about the nearby cultural resource, ATC submitted a modified route that crossed the creek
9 only once and avoided the cultural resource. As the Department of Commerce, Energy
10 Environmental Review and Analysis unit (“DOC-EERA”) noted in the Environmental
11 Assessment (“EA”) Revised Scoping Decision, the revised alignment is entirely within the
12 route width identified for the Arrowhead Substation Alternative in the original November
13 30, 2023 Scoping Decision. ATC’s proposal of a revised route alignment based on relevant
14 feedback is not an unusual occurrence in the routing process. MP witness Mr. Gunderson’s
15 concern about ATC’s proposed revised alignment is also surprising given that MP has
16 similarly proposed alterations to its Project to reduce the number of crossings of the West
17 Rocky Run Creek in light of feedback from the Minnesota Department of Natural
18 Resources, as discussed by MP witness Mr. McCourtney. Simply put, the route permitting
19 process is working as intended, and has allowed for ATC to consider and respond to
20 relevant feedback by revising the route alignment to address concerns.

21 **Q. Have there been any changes to the anticipated socioeconomic impacts of the MP**
22 **Project and the Arrowhead Substation Alternative?**

1 A. Yes. MP witness Mr. McCourtney explained in his Direct Testimony at p. 6 that MP has
2 acquired ownership of all required parcels for the MP Project. As such, it appears that those
3 residents within the Project Study Area will relocate regardless of whether the Commission
4 chooses the Arrowhead Substation Alternative or the MP Project.
5 While ATC has not performed an independent study of the socioeconomic impacts of the
6 Arrowhead Substation Alternative, according to the analysis provided in Schedule 1 to Mr.
7 McCourtney's Direct Testimony, the Arrowhead Substation Alternative will impact fewer
8 acres of Farmland of Statewide Importance and fewer acres of not prime farmland as
9 compared to MP's proposal.

10 III. PERMITTING AND OUTREACH

11 **Q. Can you explain why ATC did not reach out to agencies or local landowners and why**
12 **it is appropriate to rely on MP's prior outreach efforts?**

13 A. The Arrowhead Substation Alternative is located entirely within the Study Area that MP
14 developed for the Project. Further, as discussed in my Direct Testimony and the Direct
15 Testimony of ATC witness Ms. Lee, the impacts associated with the Arrowhead Substation
16 Alternative will be of a substantially similar type to those of the MP Project, but fewer in
17 number or of a lesser extent. As such, the studies, permitting, and outreach MP conducted
18 for the MP Project are applicable to the Arrowhead Substation Alternative. Additionally,
19 ATC is not proposing to own or construct any transmission line associated with the Project.
20 ATC is instead proposing an alternative means of interconnecting the Project that MP has
21 proposed to the transmission system. Under the Arrowhead Substation Alternative, MP
22 would not need to construct a new substation, ATC anticipates that MP would build the
23 new transmission lines and the converter station, and ATC would perform the work

1 required within the Arrowhead Substation to connect to the new converter station. The
2 work that would be done by ATC—work within the Arrowhead substation—would not
3 require any permitting and would not affect any nearby landowners. It would make little
4 sense for ATC to reach out to permitting agencies or landowners regarding work that would
5 be conducted outside the ATC Arrowhead Substation by MP rather than ATC.

6 **Q. Does ATC plan to discuss the modified route alignment with residents, landowners,**
7 **and local government officials?**

8 A. No. Such discussions between ATC and others are not necessary and could be confusing
9 to residents and other stakeholders. As I noted above, the only work that would actually
10 be conducted by ATC would be within its existing substation. In any event, the revised
11 alignment proposed by ATC is discussed in DOC-EERA's EA, which is publicly available
12 to both local landowners and permitting agencies. I also note that, according to the EA
13 completed by DOC-EERA, the Arrowhead Substation Alternative does not locate a
14 transmission line closer to residences, but in fact would locate infrastructure further from
15 residences. The EA concludes that while MP's proposed project would lead to "moderate"
16 cultural impacts, similar impacts from the Arrowhead Substation Alternative would be
17 "minimal," and would not require mitigation.

18 **Q. Does this conclude your rebuttal testimony?**

19 A. Yes.