

414 Nicollet Mall Minneapolis, MN 55401

November 4, 2019

-Via Electronic Filing-

Mr. Daniel P. Wolf Executive Secretary Minnesota Public Utilities Commission 121 7<sup>th</sup> Place East, Suite 350 St. Paul, MN 55101-2147

#### Re: APPLICATION FOR A MINOR ALTERATION OF XCEL ENERGY'S 115KV TRANSMISSION LINE 0881 IN COTTAGE GROVE, MINNESOTA

Dear Mr. Wolf:

Northern States Power Company, a Minnesota Corporation (Xcel Energy) is filing this request to the Minnesota Public Utilities Commission (MPUC or Commission) for a minor alteration authorization in compliance with Minnesota Rule 7850.4800. The minor alteration consists of a 0.58-mile extension of Xcel Energy's existing 115kV Line #0881 and a new distribution substation in Cottage Grove, Minnesota, Washington County. This in-and-out tap line will directly support the operation of an industrial gas manufacturing facility, owned and operated by Airgas, LLC. Project construction would begin in Spring 2020, and the facilities energized in Fall 2020.

# A. Applicable Law and Analysis

The existing Xcel Energy 115 kV transmission line (Line #0881) was constructed in the 1970s, prior to MPUC permitting authority. Under Minn. R. 7850.4800, subp. 1, the MPUC permitting authority is extended to those high voltage transmission lines not previously permitted by the MPUC. A minor alteration is a change in a high voltage transmission line that does not result in significant modifications to the human or environmental impacts of the facility that are subject to the Power Plant Siting Act (Minnesota Statutes Chapter 216E). An entity requesting a minor alteration is required to submit an application for the proposed action to the Commission (Minn. R. 7850.4800, Subp. 2). Per Minn. Stat. 216B.243, Subd. 8.(4), this project is exempt from the Certificate of Need approval process as it is "a high-voltage transmission line of one mile or less required to connect a new or upgraded substation to an existing, new, or upgraded highvoltage transmission line." 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 Commission for consideration" (Minn. R. 7850.4800, Subp.2).

# **B. Project Description**

The proposed minor alteration consists of an in-and-out 115kV tap line extending 3,045 linear feet (0.58 miles) westward from Xcel Energy's existing Line #0881 adjacent public road right-of-way (ROW) in the City of Cottage Grove. The proposed alignment is shown on Project Area Map 1 as attached to this Application, and has an associated 125-foot ROW to operate and maintain the line. To reduce the amount of new ROW required for the project, the transmission line ROW and public road ROW would overlap 27.5 feet as shown in the attached Typical Drawing. Both the property owner (3M Corporation) and road authority (City of Cottage Grove) are aware and approve of this alignment. If geotechnical investigations or other final engineering necessitate a shift of this alignment, Xcel Energy is requesting the Commission's approval of a 250-foot Route Width for this project, as shown on the attached maps. Any impacts associated with a shift in an alignment to the south would need to be approved by the landowner, and Commission staff as part of pre-construction review of final plan and profiles.

The northwest terminus of the proposed tap line will be the southern portion of the proposed 115kV/13.8kV Jamaica Substation, and the southeastern terminus will be connected to the existing 115 kV Transmission Line #0881. By length and width, the proposed transmission line right-of-way (ROW) occupies 8.79 acres, and the fenced area of the substation would occupy 0.67 acres. While some tree clearing would be required, the majority of the proposed transmission line ROW is low-growing vegetation that would be retained so that the only permanent vegetative and soil disturbance would occur at the six pairs of transmission structure foundations (See Map 2: Land Cover/Use.)

The proposed transmission line ROW traverses property owned by 3M Corporation, and ends on property owned by Airgas LLC. Both 3M and Airgas have given approval to place transmission line ROW on their land parcels. One crossing of public road right-of-way will be required at 100<sup>th</sup> Street South. The road authority – City of Cottage Grove – is aware of the crossing and approves of the crossing location. The tap line begins at existing Transmission Structure 0881-127 and extends to the west/northwest traversing an agricultural field, upland old

fields, and spans wetland areas between Structures #4 and #5. The location of the substation, which was previously in row crop agriculture, is on property owned by Airgas, LLC. (Map 1.)

Xcel Energy will use self-weathering steel or a combination of wood and steel poles for the transmission line extension. The in-and-out tap will consist of one, 115kV single circuit connecting into the substation from existing line #0881, and one, 115kV single circuit connecting out of the substation back to line #0881. The two single circuit alignments will be on separate transmission structure set fifty feet apart for operation and maintenance purposes, as depicted in the attached structure typical. The separate poles allow for future maintenance flexibility, allowing one part of the circuit serving the Jamaica Substation to be de-energized for maintenance while serving the substation from the adjacent poles. Spans between structures will vary between 400 to 800 feet. Structures will be 80 to 100 feet in height above grade. The transmission line will be designed to meet or exceed local and state codes, the National Electric Safety Code (NESC), and North American Electric Reliability Corporation (NERC) requirements. This includes standards relating to clearance to ground, clearance to crossing utilities, clearance to buildings, clearance to vegetation, strength of materials, clearances over roadways, ROW widths, and permit requirements.

# C. Landowners

The proposed tap line and substation will affect a total of three individual parcels. The parcels affected include 3M Corporation, Airgas, LLC and the City of Cottage Grove. Xcel Energy has worked with all three entities in designing the proposed alignment.

The 3M property located within the project area is part of 3M's Cottage Grove facility. The property covers about 1,700 acres but only about 200 acres on the southern portion are industrialized. In May 2007, the Minnesota Pollution Control Agency (MPCA) and 3M signed a Settlement Agreement and Consent Order governing the investigation and cleanup of the three 3M perfluorochemicals (PFC) disposal sites (i.e., Oakdale, Cottage Grove, and Woodbury). As part of the agreement, 3M completed a Remedial Investigation and Feasibility Study for the Cottage Grove site to identify any remaining risks to public health or the environment from releases of PFCs. According to the 3M Cottage Grove Site Feasibility Study, the project area is located outside of the area identified as being contaminated with PFCs. Monitoring wells in the transmission project vicinity are upgradient from the known contamination area, and downgradient from the

#### Application for a Minor Alteration of XCel Energy's 115kV Transmission Line 0881 in Cottage Grove, Minnesota

proposed transmission foundations. Well testing in the feasibility study did not detect any quantifiable levels of PFCs near the project area (Weston Solutions, 2008).

The City of Cottage Grove owns the road easement along 100<sup>th</sup> Street South. This local road would be crossed with overhead wires as part of the proposed tap line. Transmission structure foundations would be located outside of road ROW.

WAG Farms formerly owned the parcel identified for substation construction which was upland previously used for row crop agriculture. This property was purchased and is now owned by Airgas LLC, which has obtained all regulatory approvals for construction and operation of their industrial gas manufacturing facility.

#### D. Impacts

Table 1 provides a summary of the environmental impacts of the proposed minor alteration. A discussion of these impacts follows.

Criteria	Units	New Alignment and ROW (125 feet)	Additional Information	Source
Proposed Infrastruct	ure			
Length of Transmission Line	Feet (miles)	3,045 (0.58)	No additional information.	Xcel Energy 2019
Length that is in or Parallel to Existing Right-of-Way	Feet (miles)	3,045 (0.58)	The line is designed to follow and share the existing 80-foot city road ROW before ending at the substation.	Xcel Energy 2019
Number of Roads Crossed	Number	1	100 Street South	MnDOT 2019
Number of Parcels Crossed	Number	3	3M Company, City of Cottage Grove, Airgas.	Xcel Energy and Washington County 2019
Structures				
Number of Residences within 1000 feet	Number	0	No additional information.	Google Earth Aerial Imagery and Field Assessment 2019
Number of Non- Residential Buildings Within 1000 feet	Number	0	No additional information.	Google Earth Aerial Imagery and Field Assessment 2019

#### Table 1: Project Impact Summary

## Application for a Minor Alteration of XCel Energy's 115kV Transmission Line 0881 in Cottage Grove, Minnesota

Land CoverArea of Agricultural Land CrossedAction		(125 feet)		
	cres	2.2	Currently row cropped	MLCCS, Google Earth Aerial Imagery, and Field Assessment 2019
Area of Forested Land Crossed	cres	0.9	Upland Woodland	MLCCS, Google Earth Aerial Imagery and Field Assessment 2019
Area of Open Land Crossed	cres	3.1	Old fields	MLCCS, Google Earth Aerial Imagery and Field Assessment 2019
Area of Developed Land Crossed	cres	0.2	Roadways	MLCCS, Google Earth Aerial Imagery and Field Assessment 2019
		0.5	Deep Marsh	Field Assessment 2019
Area of Wetlands	cres	0.1	Shallow Marsh	Field Assessment 2019
Crossed	Crossed		Shrub Swamp	Field Assessment 2019
		1.1	Wet Meadow Degraded	Field Assessment 2019
Transmission Line Distance across a Lake, Stream, Fe Drainage, or Other Waterway	eet	0	During field visit and wetland determination, no waterway was found in the ROW. Historic drainage pattern has been altered by road grade and culvert.	MnDNR Public Water Inventory (2019), Google Earth Aerial Imagery
Conservation and Recrea	ation Lands			
Areas	.cres	0	No additional information.	MnDNR 2019
Refuges	.cres	0	No additional information.	USFWS 2019
Production Areas	.cres	0	No additional information.	USFWS 2019
Retuges	.cres	0	No additional information.	MnDNR 2019
Trails	cres	0	No additional information.	Washington County 2019
Mineral Resources				
	cres	0	No additional information.	MnDOT ASIS 2013
Resources	cres	0	No additional information.	MnDNR 2011
Sensitive Natural Resour	rces			
Communities	cres	1.9	Deep Marsh, Shallow Marsh, Shrub Swamp, Upland Woodland, Wet Meadow Degraded	
Railroad Right-of- Way Prairie Ad	.cres	0	No additional information.	

Criteria	Units	New Alignment and ROW (125 feet)	Additional Information	Source
Sites of Biodiversity Significance	Acres	0	A site outside of the project area to the north of 100 <sup>th</sup> Street is identified as below the minimum biodiversity significance threshold.	MnDNR
Number and Count of Known Protected or Endangered Species	Number of Species, Count within species	1	One state special concern species was identified during July 2019 survey, however, will be avoided due to timing of construction activities.	
Known Cultural Reso	ources			
National Register Properties	Number	0	No additional information.	SHPO 2019
Inventoried Historic Resources	Number	0	No additional information.	SHPO 2019
Inventoried Archeological Sites	Number	0	No additional information.	SHPO/OSA 2019

The proposed infrastructure of the tap line will include 3,045 linear feet (0.58 miles) of 115 kV transmission tap line connecting the existing 0881 Transmission Line with the proposed Jamaica Substation.

100<sup>th</sup> Street South is crossed by the proposed tap line. As mentioned above, a total of three individual parcels will be affected. All three parcels already contain infrastructure features associated with previously constructed transmission facilities (i.e., roads, poles, or transmission lines).

No residential structures are located within 1,000 feet of the proposed tap line nor the substation.

Land cover data were derived from the 2018 Minnesota Land Cover Classification System (MLCCS), a 16-class land cover dataset for the conterminous United States at a spatial resolution of 30 meters. This dataset is commonly used to quantify land cover, although because of its date of coverage and spatial resolution, is best used as an estimate and land cover should be field verified for current conditions and accuracy. In addition, certified ecologists conducted a field survey in July 2019 to verify natural communities and potential habitat on site. A total of approximately 9.5 acres of land are included in the proposed tap line ROW and the new substation footprint. Of this total, 5.1 acres (56.0 % of total project acreage) are classified as wetland. Forested land comprises 0.9 acre (9.9 % of total project acreage). A total of 0.2 acre (2.2 % of total project acreage) is classified as

medium intensity developed land. A small amount of tree clearing will be necessary along portions of the transmission line route. Xcel Energy will re-establish low growing vegetation in these cleared areas during restoration activities in consultation with the landowner (3M.)

While the NWI dataset classifies 1.9 acres of emergent herbaceous wetland in the project area (15% of total project area), 1.6 acres of freshwater emergent wetland (17.6% of project area), and 0.2 acres of freshwater forested wetland (2.2% of project area), hydrography specific datasets indicate there are no water features in the project area. No trout streams or Wild and Scenic Rivers are mapped in the project area. The project area contains one Public Waters Inventory (PWI) watercourse draining an adjacent water basin (82-86 W – see Map 3: Project Area Resources.) Public Water Inventory maps show this drainage extending south of 100<sup>th</sup> Street South. Xcel Energy has designed the project to span this feature, and not place any permanent structures in the unnamed creek. Nevertheless, Xcel Energy will need the approval of the Minnesota Department of Natural Resources for a Utility Crossing License (per the attached agency correspondence.) Xcel Energy will apply for that License following the Commission's review of the Minor Alteration Application.

There are no Wildlife Management Areas, National Wildlife Refuges, Waterfowl Production Areas, State Wildlife Areas, or County Parks and Trails located within the proposed tap line ROW. There are also no mineral or metal mining resources documented within the ROW.

According to the Minnesota Biological Survey for Washington County, there are no records of Native Plant Communities or Railroad Right-of-Way prairies within the project area. The parcel located to the north of 100<sup>th</sup> Street South is identified as a Site of Biodiversity Significance by the MDNR. However, it is classified as "below the minimum biodiversity threshold," and is not crossed by the transmission line (Map 3.)

A review of Xcel Energy's licensed NHIS dataset identified records of potential threatened and endangered species or other rare features near the project area. Historic occurrences of these species exist for the Rusty Patched Bumble Bee, Bell's Vireo, and Loggerhead Shrike.

Rusty patched bumble bee require nesting habitat, floral resources, and overwintering habitat. This species typically nests in open areas where it is not heavily forested and not too wet (USFWS, 2018). Overwintering habitat is often in

or near woodlands or woodland edges that contain spring blooming herbaceous plants, shrubs, and trees, which allows proximity to woodland spring blooming flowers, particularly spring ephemeral wildflowers, a critical early spring food source. Solitary queens mate in the fall and overwinter roughly from mid-October through mid-March (USFWS, 2018). According to USFWS mapping available in June 2019, the project is located in the low-potential zone for Rusty Patched Bumble Bee. As a result, the species is considered unlikely to be present, and therefore requires no additional avoidance or consultation with U.S. Fish and Wildlife Service.

The Bell's Vireo is a small State-special concern songbird with short, rounded wings and a short, stout bill. This species relies on grassland habitats with some component of shrubs and small trees. Upland habitats are preferred but this species has also been known to nest in wet or riparian habitats as well. ROW corridors attract this songbird due to the presence of small to medium growing shrub species. To avoid impacts to this species, ROW clearing activities in areas of suitable habitat would be conducted during the winter to avoid any potential for impacts during nesting season, which begins in April. In addition, a larger amount of contiguous and higher quality habitat exists in the vicinity of the project area, but outside of the project corridor.

The Loggerhead Shrike is a State-endangered songbird. It is has a gray back, black wings and light colored breast and tail. This white bird has a slim, black tail, large head, hooked black beak and distinctive black mask. Preferred habitat for the shrike includes open, grassy country with scattered shrubs or small trees. The proposed construction schedule anticipated would avoid the active nesting period required for this species. Similar to the impact avoidance measures for the Bell's Vireo, ROW clearing activities in areas of suitable habitat would be conducted during the winter to avoid any potential for impacts during nesting season, which begins in April. In addition, a larger amount of contiguous and higher quality habitat exists in the vicinity of the project area, but outside of the project corridor.

Four structures and one historic landscape feature were mapped within the project area; however, aerial imagery review by an archaeologist indicated that none of these structures were still extant. Very few of the structures associated with the historic landscape feature appear to be extant and those that do are outside of the project area. Portions of three other historic landscape features also likely traverse portions of the project area, which are historic transportation corridors but are unlikely to be affected by the project. While there are identified archaeological resources within one mile of the proposed project, based on an archaeological review, they will not be affected by the proposed project.

The maximum electric field, measured at one meter above ground, associated with the Project is calculated to be 1.25 kV/m which is below the Commission's 8 kV/m threshold. The calculated electric fields for the Project are provided in Table 2. No residences or non-residential structures will need to be relocated due to construction and operation of the tap line.

# Table 2: Calculated Electric Fields (Kv/M) For Proposed 115/115 kV Design (3.28 Feet Above Ground)

	Maximum	Distance to Proposed Centerline						
Structure Type	Operating Voltage (kV)	-75'	-50'	-25	0'	25	50'	75'
Steel 115kV/115kV Single Poles, Single Circuit	115/115	0.31	0.74	0.80	1.25	0.80	0.74	0.31

The magnetic field profiles for each structure configuration being considered for the Project are shown in Table 3. The peak magnetic field values are calculated at a point directly under the proposed transmission line and where the conductor is closest to the ground. The same method is used to calculate the magnetic field at the edge of the right-of-way. The calculated magnetic fields show that field levels decrease rapidly as the distance from the centerline increases.

# Table 3: Calculated Magnetic Flux Density (MILLIGAUSS) For Proposed 115/115 kV Transmission Line Design (3.28 Feet Above Ground)

0	Syste Distance to Proposed Centerline							
Segment	m Condi tion	-75 <b>'</b>	-50'	-25	0'	25	50'	75 <b>'</b>
Steel 115kV/115kV Single Poles, Single Circuit	Peak	21.8	43.5	67.6	62.4	67.6	43.5	21.8

Noise levels produced by the two, 115kV single circuits are generally less than outdoor background levels and are therefore not usually audible. Calculated audible noise levels from the proposed distribution substation transformer are shown in Table 4 below. The project will comply with daytime and nighttime noise standards established by the Minnesota Pollution Control Agency, and will not be greater than existing ambient noise levels in the area at a distance of 500 feet from the noise source. There are no sensitive receptors in the project area closer than 1800 feet from the noise source.

# Table 4: Calculated Audible Noise (Db) For Proposed 115kV/13.8kV Jamaica Substation

		Distance to Proposed Transformer (feet)							
Sound pressure source	-500'	-250'	-100	0'	100'	250'	500'		
Jamaica Substation 115kV/13.8kV Transformer (Maximum L50 dBA)	50.0	50.18	51.26	69.0	50.68	50.1	50.0		

# E. Assessment of Project Impacts

Xcel Energy has designed the project to not result in significant changes to the human and environmental impacts of Transmission Line #0881. An evaluation of the impacts of the project relative to the routing factors found in Minnesota Rules Chapter 7850.4100 can be found in Table 5 below.

#### Table 5: Assessment of Impacts of Requested Alignment.

Routing Factor: Minnesota Rules 7850.1900 subp. 3 and Minnesota Rules 7850.4100	Impact Regarding Alignment and Right-of- Way Change Requested
Effects on human settlement, including, but not limited to displacement, noise, aesthetics, cultural values, recreation and public services.	No impacts to human settlement will occur as a result of the project construction nor operation. There are no residences within 1,000 feet of the tap line. No displacement will be required. Noise levels will be below state standards. No recreation facilities or public services will be impacted. Any incremental effects to cultural values and aesthetics are minimized by aligning right-of-way with an existing roadside (100 <sup>th</sup> Street South).
Effects on Public Health and Safety	No impacts to public health and safety are anticipated. The calculated electric field levels are below state standards. No safety concerns exist with the construction or operation of this tap line.

# Application for a Minor Alteration of XCel Energy's 115kV Transmission Line 0881 in Cottage Grove, Minnesota

Routing Factor: Minnesota Rules 7850.1900 subp. 3 and Minnesota Rules 7850.4100	Impact Regarding Alignment and Right-of- Way Change Requested
Effects on land-based economies, including, but not limited to agriculture, forestry, tourism and mining.	No impacts to land-based economies are anticipated. Based on project design, effects to agricultural activities will be minimal.
Effects on archaeological and historic resources.	Archaeological and architectural resources mapped within the project area are unlikely to be affected by the project. No impacts are anticipated.
Effects on the natural environment, including effects on air and water quality resources and flora and fauna.	No impacts to the natural environment are anticipated. See Table 1 for natural resource impact information.
Effects on rare and unique natural resources.	One state special concern species was found within the edge of the project area, however, work will occur to avoid impacts to this species. Any clearing of habitat will be selectively localized, and occur outside of the nesting period. No impacts are anticipated.
Application of design options that maximize energy efficiencies, mitigate adverse environmental effects, and could accommodate expansion of transmission or generating capacity.	The project has been designed to maximize energy efficiencies, and avoid any environmental effects. No mitigation will be required. The project is designed to provide energy directly to a single customer.
Use or paralleling of existing right-of-way, survey lines, natural division lines, and agricultural field boundaries.	The proposed route shares a portion of its route with adjacent roadsides.
Use of existing large electric power generating plant sites. Use of existing transportation, pipeline, and electrical transmission systems rights-of-way.	Not applicable to current project. The proposed route shares a portion of its ROW with adjacent public road ROW.
Electrical system reliability.	The proposed project will support reliable transmission of electricity.
Cost of constructing, operation and maintenance which are dependent on design and route.	The anticipated costs to construct and operate the project are approximately \$6.75 million.
Human and natural environmental effects that cannot be avoided.	Any minimal human and environmental effects associated with the project are described in Table 1, and are not significant in nature.
Irreversible and irretrievable commitments of resources.	No irreversible or irretrievable commitments of resources are anticipated as part of this project.
Measures that might be implemented to mitigate the potential human and environmental impacts identified above and the estimated cost of the mitigative measures.	No mitigative measures are needed for this project. The project has been designed to minimize any impacts to human and environmental factors.
Wilderness Areas: No high voltage transmission line may be routed through state or national wilderness areas (Prohibition, Minn. Rules 7850.4300).	The proposed project does not include crossings of any state or national wilderness areas.
Parks and Natural Areas: No high voltage transmission line may be routed through state or national parks or state scientific and natural areas unless the transmission line would not materially damage or impair the purpose for which the area was designated and feasible and prudent alternative exists. Economic considerations alone do not justify use of these areas for high voltage transmission line (Minn. Rules 7850.4300).	The proposed project does not include crossings of any state or national parks or state scientific and natural areas.

#### E. Project Need, Schedule and Cost

Airgas, LLC, is an air products manufacturer that produces liquefied and compressed air products for industrial use. Airgas has begun construction on their property in Cottage Grove, MN, and has requested electric service from Xcel Energy on or before September 1, 2020. The nature of the Airgas facility requires a 115 kV / 13.8 kV substation be constructed at their facility in order to start their large motors that power the facilities compressor. Service from distribution feeders would not meet the Airgas power requirements driving the need to take service directly from a 115 kV / 13.8 kV transformer located on their property.

To meet this customer's schedule, Xcel Energy proposes the following project schedule.

Activity	Schedule
State permitting	October 2019-January 2020
Order long lead materials	November 2019
Substation electrical construction	February - August 2020
Vegetation clearing	February 2020
Transmission line construction	March - August 2020
Construction complete, project in service	September 1, 2020

The project has an estimated cost of \$6.75 million.

#### F. Conclusion

Based on the information included in this minor alteration application, Xcel Energy believes the proposed 115 kV Transmission Tap Line and Substation project does not represent a significant change in the human or natural environment, and therefore qualifies as a Minor Alteration as defined by Minnesota Statute and Rule. Xcel Energy respectfully requests that the Commission approve the proposed minor alteration.

If there are any questions regarding this filing, please feel free to contact Matt Langan, Xcel Energy, at (612) 330-6954 or <u>Matthew.A.Langan@xcelenergy.com</u>.

Sincerely,

allmussen

PAMELA J. RASMUSSEN SENIOR MANAGER, SITING & LAND RIGHTS XCEL ENERGY

Enclosures cc: Service List

#### Works Cited

Weston Solutions. (2008). *Feasibility Study: Cottage Grove Site, Cottage Grove, Minnesota*. St. Paul, Minnesota: 3M Company.











#### Langan, Matthew A

From:	Warzecha, Cynthia (DNR) <cynthia.warzecha@state.mn.us></cynthia.warzecha@state.mn.us>
Sent:	Friday, October 04, 2019 1:55 PM
То:	Langan, Matthew A
Cc:	Horton, Becky (DNR); Joyal, Lisa (DNR)
Subject:	RE: Cottage Grove 115kV Tap Line Project

#### CAUTION EXTERNAL SENDER: Stop and consider before you click links or open attachments. Report suspicious email using the 'Report Phishing/Spam' button in Outlook.

Hi Matt,

The DNR appreciates the opportunity to review the Cottage Grove 115kV Tap Line Project. Based on the project summary and the maps provided, it appears that Xcel has done a nice job avoiding sensitive resources. We are providing a few reminders, of which you are likely familiar.

- The project appears to cross an unnamed stream, which is a DNR public water. As a reminder, the DNR
  Division of Lands & Minerals is responsible for granting permission to companies that propose to cross
  public lands and waters with utility infrastructure projects; a utility license will be required from the
  DNR. Information can be found at the <u>DNR Utility Crossing website</u>. Bird diverters may be required as
  part of the License application upon review by Region staff.
- As described, current designs have poles #4 and #5 spanning the NWI wetland to avoid impacts to the water feature. Should plans change and poles be moved or work be proposed to occur below the ordinary high water level (OHWL) of the unnamed stream that would alter the course, current or cross section of the public water, a public waters work permit may also be required.
- A water use permit is required for all water users in Minnesota withdrawing more than 10,000 gallons of water per day, from surface or groundwater, or one million gallons per year. Permit information and permit application forms can be found on the <u>MDNR website</u> should this activity apply to this project.

Please coordinate directly with Lisa Joyal, Endangered Species Review Coordinator, to ensure that the project avoids impacts to Bell's vireo and the loggerheaded shrike.

Thanks again for reaching out early to discuss the project.

Best regards,

Cynthia

From: Langan, Matthew A [mailto:Matthew.A.Langan@xcelenergy.com]
Sent: Wednesday, October 2, 2019 11:13 AM
To: Warzecha, Cynthia (DNR) < cynthia.warzecha@state.mn.us
Subject: Cottage Grove 115kV Tap Line Project</pre>

#### Cynthia –

Please find attached two maps and associated shapefiles (.zip) representing our final project design. We very much appreciate DNR's review prior to our Minor Alteration Application filing with the Public Utilities Commission.

Recall that minor alterations should not significantly change the human or environmental impacts associated with the existing 115kV line. After our review of the project area, and developing the design, we believe this project represents a minor alteration. We will be interested to know if you agree. As you are aware, I will also be separately reaching out to Lisa Joyal with MDNR's Natural Heritage Program with a Request for Concurrence on our database search, in-field surveys, and impact avoidance measures for listed species.

As a recap of the project: Xcel Energy is proposing a 3000-foot extension of Line 0881 in Cottage Grove, Washington County, MN to tap into a distribution substation to serve a single customer – Airgas, LLC. The substation site is located on 0.67 acres of land owned by Airgas, which is upland previously used for row-crop agriculture. The 125-foot tap line right-of-way follows the northern border of land owned by 3M, and shares public road right-of-way owned by the City of Cottage Grove. The line is routed on the south side of 100<sup>th</sup> Street South to avoid a Public Water Wetland, and Site of Biodiversity Significance (below the threshold,) north of the road. [See Map 1 for tap line alignment and natural resource features.] Additionally, we have designed the project to span the NWI wetland on 3M property between structures #4 and #5 to avoid impacts to that water feature. [See Map 2 for land cover information.]

Once you've had a chance to review the maps and shapefiles, please let me know if you need any additional information or would like to discuss the final design any further. As part of the Commission's Minor Alteration review process, there will of course be another opportunity for your agency to provide comments, but we appreciate your review and any comments you can offer in advance of our filing.

Sincerely, Matt Langan

#### Matt Langan

Xcel Energy | Responsible By Nature Principal Agent, Siting and Land Rights 414 Nicollet Mall, 414-6A, Minneapolis, MN 55401 P: 612.330.6954 F: 612 330-6357 E: matthew.a.langan@xcelenergy.com