



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

February 20, 2015

VIA ELECTRONIC FILING

Mr. Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
350 Metro Square Building
121 Seventh Place East
St. Paul, MN 55101

Re: *In the Matter of the Route Permit Application by Great River Energy and Xcel Energy for a 345 kV Transmission Line from Brookings County, South Dakota to Hampton, Minnesota - Docket No. ET-2/TL-08-1474 – Request for Minor Alteration Determination.*

Dear Mr. Wolf:

On September 14, 2010, and March 1, 2011, the Minnesota Public Utilities Commission (“Commission”) granted Great River Energy, a Minnesota cooperative corporation, and Northern States Power Company, a Minnesota corporation (“Permittees,” on behalf of Great River Energy, Northern States Power Company, Central Minnesota Municipal Power Agency, Otter Tail Power Company, and Western Minnesota Municipal Power Agency, together, “Brookings Project Owners”) a Route Permit for the Brookings County-Hampton 345 kV Transmission Line Project pursuant to Minnesota Rule 7850.4800. The Brookings County-Hampton 345 kV Transmission Project is referred to herein as the “Brookings Transmission Line.”

Great River Energy respectfully requests that the Commission approve a minor alteration in the Route Permit for the Brookings Transmission Line. Specifically, Great River Energy requests that the Commission approve temporary use of the open position on the double circuit capable structures on a portion of the Helena to Chub Lake Segment (between Structures #044 and #068) of the Brookings Transmission Line for an approximate 4.2 mile new 115 kV transmission line needed to serve the proposed Cedar Lake Substation (the new 115 kV transmission line and the Cedar Lake Substation are referred to herein as the “Cedar Lake Project”), which will in turn serve the new St. Patrick Pump Station proposed by Minnesota Pipe Line Company (“MPL”) as part of the Minnesota Pipe Line Reliability Project. The MPL System is operated and maintained by Koch Pipeline Company, L.P. MPL submitted a Certificate of Need application for the Minnesota Pipe Line Reliability Project on July 25, 2014 (Docket No. PL-5/CN-14-320).

The open position is the result of the Certificate of Need granted by the Commission for the Brookings Transmission Line (Docket No. ET-2, E-002 *et al.*/CN-06-115). The Commission authorized Permittees to construct the “Upsized Alternative,” meaning that the Commission authorized construction of transmission towers with sufficient capacity to bear two 345 kV lines, even where there are no plans to install a second line. The terms and conditions of Great River Energy’s temporary use of the open second circuit position for the Cedar Lake 115 kV line, including the manner in which the temporary use can be terminated, will be specified in a formal agreement between the other Brookings Project Owners and Great River Energy.

If the minor alteration is approved as requested herein, the temporary use of the open circuit position on the Brookings Transmission Line by the Cedar Lake 115 kV transmission line will commence in 2017 and extend no longer than the time when the open position is needed for a new permanent transmission circuit. Upon receipt of notice from the Brookings Project Owners that the second circuit position being used by the Cedar Lake 115 kV line is needed, Great River Energy will be required to develop alternative facilities for the 115 kV facilities on this portion of the Brookings Transmission Line in the Helena to Chub Lake Segment, including seeking the required approvals for such alternative facilities.

Co-locating the new 115 kV transmission line with the existing 345 kV circuit will reduce human and environmental impact through the use of an existing transmission corridor and structures. A minor alteration approval, at this time, is appropriate because the requested change has impacts comparable to the impacts associated with the initially approved alignment, does not result in significant change in the human or environmental impact of the facility, and would have significantly less human and environmental impacts than a longer (approximately 6-8 miles) new transmission line corridor that would otherwise be needed to serve the pump station.

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 Plant Siting Act, Minnesota Statutes Chapter 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.

The Alteration

The Cedar Lake Project involves tapping the new 115 kV transmission line between New Market and Veseli (construction of this portion of the Elko New Market and Cleary Lake Areas Project (Docket ET2, TL-12-1245) will begin in summer 2015) with a 3-way switch located in the NW¼, NW¼ of Section 26, T113N, R22W. If this minor alteration is approved, this switch would be constructed as part of the New Market to Veseli line (Structure 76) in fall 2015, earlier than the rest of the Cedar Lake Project, for efficiency and cost-saving purposes. The Cedar Lake 115 kV transmission line would extend from the new 3-way switch to Brookings Transmission Line Structure #068 and would occupy the existing open position on the Brookings Transmission Line

to Structure #044, which is located approximately 4.2 miles west of Structure #068. At this point the Cedar Lake 115 kV transmission line would exit the Brookings Transmission Line and run south to Minnesota Valley Electric Cooperative’s proposed new Cedar Lake Substation. The route is depicted in the attached **Exhibit A**.

The Cedar Lake Project would be located either within the CapX 1000-foot permitted route, or on property owned by MPL. The portion of the Cedar Lake Project that would be located on MPL property (the proposed Cedar Lake Substation and a short tap line less than 1500 feet in length) would require a conditional use permit from Scott County.

The routing factors identified in Minn. Rule 7850.4100 are discussed in **Table 1**.

Table 1. Routing Factors

Minn. R. 7850.4100	
A. Human settlement	The majority of the Cedar Lake 115 kV transmission line would be strung on the open position of CapX structures that are already in place; there are no homes located within the right-of-way and no displacement would be required. On the west end of the Cedar Lake Project, new facilities outside the CapX 1000-foot permitted route would include a short tap line and new substation, on property owned by MPL (for whom the Cedar Lake Project would be built). The east end of the Cedar Lake Project would terminate on a switch structure (Structure 76), a larger structure than would have been in that location as part of the separate Great River Energy Elko New Market and Cleary Lake Areas Project (construction scheduled to begin in summer 2015).
B. Effects on public health and safety	No impacts on public health and safety are anticipated for the proposed minor alteration.
C. Effects on land-based economies	The only additional effect the Cedar Lake Project would have on land-based economies would be minor loss of agricultural land on the west end for the new substation. No anticipated effects on mining, forestry, or tourism.
D. Effects on archaeological and historic resources	Cultural resources in this area were evaluated under the CapX docket. There were three Areas of Potential Effect (based on poles in wetlands) in this portion of the Helena to Chub Lake segment. One lithic flake was discovered during the pedestrian survey, and no buildings/structures were recommended as eligible for listing on the NRHP. No effects on cultural resources are anticipated.

E. Natural environment	The only additional effect of the Cedar Lake Project on natural resources would be one new pole at the edge of a wetland on the east end of the Cedar Lake Project (NE ¼, NE ¼, Section 27, T113N, R22W) and a short span across that wetland. The CapX line crosses two public waters (unnamed tributaries of Porter Creek - near Structures 57 and 60); Great River Energy will work with the DNR to amend the crossing license if necessary.
F. Effects on rare and unique natural resources	Rare and unique resources were evaluated as part of the CapX docket; none were identified in the minor alteration area.
G. Design options that maximize energy efficiencies, mitigate adverse environmental effects and accommodate expansion	The design option to utilize existing transmission structures for the majority of the Cedar Lake Project maximizes energy efficiencies and mitigates adverse environmental effects by avoiding building an approximate 6-8 mile transmission line (that would likely terminate further south on the new New Market to Veseli 115 kV transmission line) in brand new ROW.
H. Use or paralleling of existing rights-of-way, survey lines, natural division lines, and agricultural field boundaries	Approximately 92 % of the Cedar Lake Project would use an existing transmission line ROW that is along an existing road.
I. Use of existing large electric power generating plant sites	Not applicable
J. Use of existing transmission line rights-of-way	Approximately 92 % of the Cedar Lake Project would use an existing transmission line ROW.
K. Electrical system reliability	The Cedar Lake Project would ensure electrical system reliability for the proposed MPL pump station.
L. Costs	The estimated cost to permit and build the Cedar Lake Project as proposed is approximately \$2 million. The estimated cost to permit and build the Cedar Lake Project as a new, approximately 6-8 mile 115 kV line in brand new ROW is approximately \$5.8 to \$7.4 million.

Affected Landowners List

A list identifying the landowners that would be affected by this Minor Alteration (in both spreadsheet and Word formats) is attached as **Exhibit B**.

Conclusion

Permittees respectfully request that the Commission approve the requested minor alteration to temporarily accommodate approximately 4.2 miles of 115 kV transmission line on the CapX Brookings County to Hampton transmission line between Structures #068 and #044 (all facilities within the CapX 1000-foot permitted route shown on Exhibit A) to serve a new substation that will in turn serve a new pump station proposed by MPL.

Please contact me at (763) 445-5214 if you have any questions regarding this filing.

Sincerely,

GREAT RIVER ENERGY

Carole L. Schmidt

Carole L. Schmidt
Supervisor, Transmission Permitting and Compliance

Attachments: **Exhibit A** – Map Showing Minor Alteration Request
Exhibit B – Affected Landowner List

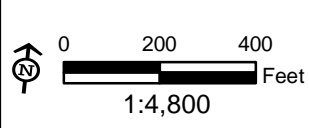
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CapX2020

Delivering electricity you can rely on



Date: 1/28/2015

Proposed Substation and Cedar Lake transmission structure locations are approximate. Final locations are subject to revisions based on engineering design.



- Proposed Pole Location
- Proposed Cedar Lake Line
- ▭ Proposed Cedar Lake Substation
- Pole Location
- Centerline
- ▭ 150 ft. ROW

- Pole Location
- Veseli to New Market 115 kV Line
- Existing Transmission Lines
- 69 kV
- 115 kV
- 345 kV

- PWI Class
- Lake
 - Wetland

- Lake
- Wetland
- PWI Stream
- Stream/River

- Railroad
- Section
- Township
- County

Exhibit A
CapX Minor Alteration
to Accommodate
Cedar Lake Project

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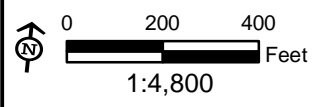
Brookings County to Hampton
345 kV Transmission Line



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- | | | | | |
|----------------------------------|------------------------------------|----------------|----------------|------------|
| ● Proposed Pole Location | ● Pole Location | PWI Class | ● Lake | — Railroad |
| — Proposed Cedar Lake Line | — Veseli to New Market 115 kV Line | ● Lake | ● Wetland | — Section |
| □ Proposed Cedar Lake Substation | Existing Transmission Lines | ● Wetland | — PWI Stream | □ Township |
| ● Pole Location | — 69 kV | — Stream/River | — Stream/River | □ County |
| — Centerline | — 115 kV | | | |
| □ 150 ft. ROW | — 345 kV | | | |

Exhibit A
CapX Minor Alteration
to Accommodate
Cedar Lake Project

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*Brookings County to Hampton
345 kV Transmission Line*



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Exhibit A
CapX Minor Alteration
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Cedar Lake Project
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*Brookings County to Hampton
345 kV Transmission Line*



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Exhibit A
CapX Minor Alteration
to Accommodate
Cedar Lake Project

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*Brookings County to Hampton
345 kV Transmission Line*



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Exhibit A
CapX Minor Alteration
to Accommodate
Cedar Lake Project

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*Brookings County to Hampton
345 kV Transmission Line*

Exhibit B

Tract #	Last Name	First Name	Address1	City	State	Zip	Pole #
CapX-HCL 0320	Minnesota Pipe Line Company		13775 Clark Road	Rosemount	MN	55068	0960-043 0960-044
CapX-HCL 0330	Hendricks	Jon & Mary	880 260th Street W	New Prague	MN	56071	
CapX-HCL 0340	Novotny	George	825 260th Street W	New Prague	MN	56071	0960-045
CapX-HCL 0350	Pomije Farms LLC	(Ken Pomije)	25815 Cedar Lane	New Prague	MN	56071	0960-046, 0960-047, 0960-048
CapX-HCL 0370	Hendricks Family LP	Mark Hendricks	42770 State Highway 28	Morris	MN	56267	0960-049 0960-050 0960-051
CapX-HCL 0381	Jenkins	David	1086 260th Street E	New Prague	MN	56071	
CapX-HCL 0382	Sampson	Christopher & Julie	1090 260th Street E	New Prague	MN	56071	
CapX-HCL 0390	Tupy	Roger & Joyce	26445 Langford Avenue	New Prague	MN	56071	0960-052 0960-053 0960-054
CapX-HCL 0391	Polson	Bruce & Teri	1405 260th Street E	New Prague	MN	56071	
CapX-HCL 0400	Ploumen	Keith	25981 Freeborn Avenue	New Prague	MN	56071	0960-055
CapX-HCL 0410	Solheit	Robert	1730 260th Street E	New Prague	MN	56071	0960-056
CapX-HCL 0420	Logue	Bryan & Kelly	1800 260th Street E	New Prague	MN	56071	
CapX-HCL 0430	Reese	Teresa	1771 260th Street E	New Prague	MN	56071	
CapX-HCL 0440	Tupy	Allen	1951 260th Street E	New Prague	MN	56071	0960-057
CapX-HCL 0450	Tupy	Bernice	1404 3rd Street SE	New Prague	MN	56071	0960-058
CapX-HCL 0460	Tupy	Ronald & Susan	26242 Vergus Avenue	New Prague	MN	56071	0960-059
CapX-HCL 0470	Stratton	Daniel & Rebecca	24346 East Cedar Lake Drive	New Prague	MN	56071	0960-059
CapX-HCL 0480	Bank of America		400 Countrywide Way	Simi Valley	CA	93065	
CapX-HCL 0490	Pickit	David	26071 Prairie Rose Court	Webster	MN	55088	
CapX-HCL 0500	Sirek, Jr.	Mathias	2591 260th Street E	Webster	MN	55088	0960-061 0960-062
CapX-HCL 0520	Sirek	John	25800 Fairlawn Avenue	Webster	MN	55088	0960-063 0960-064 0960-065
CapX-HCL 0530	Call	Kayland Evan	3600 260th Street E	Webster	MN	55088	0960-066 0960-067
CapX-HCL 0540	Hirman	Dennis & Sandra	1840 Deer Pond Circle	Eagan	MN	55122	0960-068
CapX-HCL 0550	Pexa	Robert & Karen	915 West 270th Street	New Prague	MN	56071	0960-069 0960-070 0960-071
	Ophus	Timothy & Jennifer	4060 Hunters Lane	Webster	MN	55088	
	Flanagan	Thomas & Kerri	26076 Panama Avenue	Webster	MN	55088	

Exhibit B

Minnesota Pipe Line Company 13775 Clark Road Rosemoutn, MN 55068	Jon & Mary Hendricks 880 260th Street W New Prague, MN 56071	George Novotny 825 260th Street W New Prague, MN 56071
(Ken Pomije) Pomije Farms LLC 25815 Cedar Lane New Prague, MN 56071	Mark Hendricks Hendricks Family LP 42770 State Highway 28 Morris, MN 56267	David Jenkins 1086 260th Street E New Prague, MN 56071
Christopher & Julie Sampson 1090 260th Street E New Prague, MN 56071	Roger & Joyce Tupy 26445 Langford Avenue New Prague, MN 56071	Bruce & Teri Polson 1405 260th Street E New Prague, MN 56071
Keith Ploumen 25981 Freeborn Avenue New Prague, MN 56071	Robert Solheit 1730 260th Street E New Prague, MN 56071	Bryan & Kelly Logue 1800 260th Street E New Prague, MN 56071
Teresa Reese 1771 260th Street E New Prague, MN 56071	Allen Tupy 1951 260th Street E New Prague, MN 56071	Bernice Tupy 1404 3rd Street SE New Prague, MN 56071
Ronald & Susan Tupy 26242 Vergus Avenue New Prague, MN 56071	Daniel & Rebecca Stratton 24346 East Cedar Lake Drive New Prague, MN 56071	Bank of America 400 Countrywide Way Simi Valley, CA 93065
David Pickit 26071 Prairie Rose Court Webster, MN 55088	Mathias Sirek, Jr. 2591 260th Street E Webster, MN 55088	John Sirek 25800 Fairlawn Avenue Webster, MN 55088
Kayland Evan Call 3600 260th Street E Webster, MN 55088	Dennis & Sandra Hirman 1840 Deer Pond Circle Eagan, MN 55122	Robert & Karen Pexa 915 West 270th Street New Prague, MN 56071
Timothy & Jennifer Ophus 4060 Hunters Lane Webster, MN 55088	Thomas & Kerri Flanagan 26076 Panama Avenue Webster, MN 55088	