

November 15, 2016

Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: City of Burnsville Comments to the Public Utilities Commission Concerning Xcel Energy Route Permit for the Black Dog Natural Gas Pipeline Project in Burnsville, Minnesota.

PUC Docket Number G002/GP-16-656

To Whom This May Concern:

The purpose of this letter is to provide comments from the City of Burnsville for consideration by the Public Utilities Commission for the Black Dog Gas Pipeline Project proposed by Xcel Energy. These updated comments are based on a recent review of more detailed pipeline alignment drawings submitted to the City by Xcel Energy, and feedback received from residents along the proposed pipeline corridor. The City has reviewed the proposed route map and is in support of the project provided the following items are addressed as part of the project:

1. The City supports the gas line extension down the route shown through the existing overhead transmission power corridor from TH 13 to the UP Railroad with the following conditions:
 - a. The original alternative alignment utilizing US Fish and Wildlife (USFW) property is not feasible. The City will contract the USFW to confirm that route is not feasible.
 - b. The new pipeline is constructed as close to the center of the City's property (as far from private property) as possible.
 - c. Tree removal is minimized and buffer trees along the City property lines are not removed. All proposed tree removal should be clearly identified and approved by the City and a Tree Removal Permit shall be obtained prior to removal.
 - d. All applicable safety measures are incorporated in to the design and maintenance of the proposed pipeline.
 - e. Xcel obtains an easement for the pipeline from the City of Burnsville.
2. The City would like Xcel to construct a recreational 10' wide bituminous trail down this corridor from the trail on TH 13 to the City's parking area in Black Dog Park. This will require some trail construction out of this corridor to construct from the City land where the transmission lines are to the park. The City will provide access to these areas for no compensation beyond Xcel's construction of the described recreational trail.
3. The existing trail along TH 13 will need to be replaced as the proposed route will impact our trail. The applicable right-of-way use, easements, permits for this work will need to be obtained from MnDOT and the City of Burnsville.

4. The City will need to review any wetland delineations and proposed wetland impacts associated with the project.
5. Neighborhood meeting(s) should be held by Xcel to share the plans and gather community input.
6. The proposed plans will need to be reviewed by the Burnsville Parks & Natural Resources Commission (PNRC) because part of the project impacts City park land.
7. The Xcel project design team will need to work with City staff early on to establish a trail alignment that will meet the needs of both parties.
8. Xcel will need to work with the Natural Resources Department staff to develop a landscaping plan that maximizes the use of native plants to restore the corridor after construction.
9. The City of Burnsville and Xcel Energy have a signed "Road Access Improvements/Assessment and Development Agreement" that states once the plant proceeds "with plans to repower the Plant with an approximately 600MW or greater power plant" that Xcel also will "improve Plant access by extending 12th Avenue through Black Dog Park to the Plant's southerly access". Please provide how many megawatts the plant will be operating at, in total, with the new gas powered burner addition. If it is 600 MW or more, the 12th Avenue extension is required to be built at the same time.
10. Based on the documentation submitted to date, there does not appear to be any work proposed within the floodway of the Minnesota River therefore no Conditional Use Permit will be required for the project. A FEMA Elevation Certificate and No Rise Certificate will need to be provided and "as-constructed" plans will need to be submitted to the City. In the event plans change as the project evolves, a floodplain CUP may be required if the project meets or exceeds ordinance thresholds.

The City of Burnsville and Xcel Energy have worked together in partnership for many years and we understand the need for this project to provide electric services to the City and region. The City is in support of the project and based on the items identified herein and discussed with Xcel throughout this process, we believe that there will be mutual benefits to the public and all parties associated with this project.

Thank you for the opportunity to provide comments on the proposed Black Dog Pipeline Project.

Sincerely,



Deb Garross
City Planner

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