



January 25, 2021

Via e-Filing

Mr. Will Seuffert, Executive Secretary
Minnesota Public Utilities Commission
127 Seventh Place East, Suite 350
Saint Paul, MN 55101-2147

**RE: PFC Response to Comments and Recommendations on Application
Completeness, Pipeline Routing Permit for the Pine Bend Pipeline Project
Docket No. IP-7042/PPL-20-872**

Dear Mr. Seuffert,

Pursuant to the Minnesota Public Utilities Commission's (Commission) January 6, 2021 Notice of Comment Period, Premium Fuels Company (PFC) respectfully files brief responses to the Comments submitted by the Minnesota Department of Commerce, Energy Environmental Review and Analysis (EERA), the Minnesota Department of Natural Resources (DNR) and the Laborer's International Union of North America (LIUNA) regarding the Completeness of the PFC's Application for a Pipeline Route Permit. PFC provides its response to each party below and requests that the Commission find its Application complete such that review can move forward in an expeditious manner.

Response to EERA

In its Comments, EERA notes that it performed a thorough review of the Application and outlined the process for a Pipeline Routing Permit. EERA recommends that the Commission accept the Application as complete upon PFC filing Figure 10 of the Application, which was inadvertently omitted with the original Application filing.

PFC appreciates the Department's review and has attached to these comments the missing Figure 10, showing the current site plan for the FMG Renewable Gas Processing Facility. With the filing of Figure 10, PFC agrees with EERA that the Commission should find the Application complete.

Since the filing of EERA's Comments, EERA and PFC's representative, WSB, also discussed the project scope, including whether the Renewable Natural Gas Processing Facility that would process landfill gas to PFC's proposed pipeline for transport should be considered an "associated facility" of the pipeline. To ensure clarity in the record and address any questions that may arise, the Processing Facility is not an associated facility of the proposed pipeline.

First, the gas to be transported through PFC's pipeline is renewable natural gas refined from landfill gas by the FORTISTAR Methane Group (FMG). FMG, not PFC, will own the Processing Facility. The ownership of PFC and FMG is completely separate; FMG has contracted with PFC to provide gas transportation services through the pipeline to be permitted in the instant proceeding from FMG's Processing Facility to an injection point into the Northern States Power Company's pipeline system.

Second, the Processing Facility is subject to separate state and local permitting, including air permitting from the Minnesota Pollution Control Agency and a conditional use permit from City of Inver Grove Heights.¹ In this respect, the Processing Facility is (1) owned by another entity; (2) subject to separate permitting; and (3) not part of the pipeline project before the Commission in this proceeding.²

Response to DNR

In its Comments, DNR reviewed the Application and made recommendations regarding 3 species of birds, which may be present within a mile of the proposed pipeline route, along with recommendations regarding timing for clearing of portions of the route that include trees which may host nests. DNR also recommended the use of BWSR-approved native weed-free seed mixes for restoration.

PFC appreciates DNR's Comments and notes that PFC anticipated that construction could begin in May, 2021 (during the April – July nesting season). If PFC is able to begin construction prior to the April time frame for nesting, PFC will endeavor to clear the areas of concern prior to the nesting period; if that is not feasible, PFC will work with DNR to perform a study/survey of those areas to determine if nesting would be impacted by planned activities. Finally, PFC will ensure that only seed mixes meeting the DNR recommendations are used for the restoration phase of the project.

Response to LIUNA

LIUNA submitted a letter recommending that the Application be accepted as complete, emphasizing the quality of pipeline construction jobs and the environmental advantages of renewable natural gas as reasons to support this project. PFC appreciates LIUNA's support and notes that LIUNA is one of the Trades that are commonly used for pipeline construction.

¹ Other permitting includes building and electrical permits, drive way access permits and discharge permits.

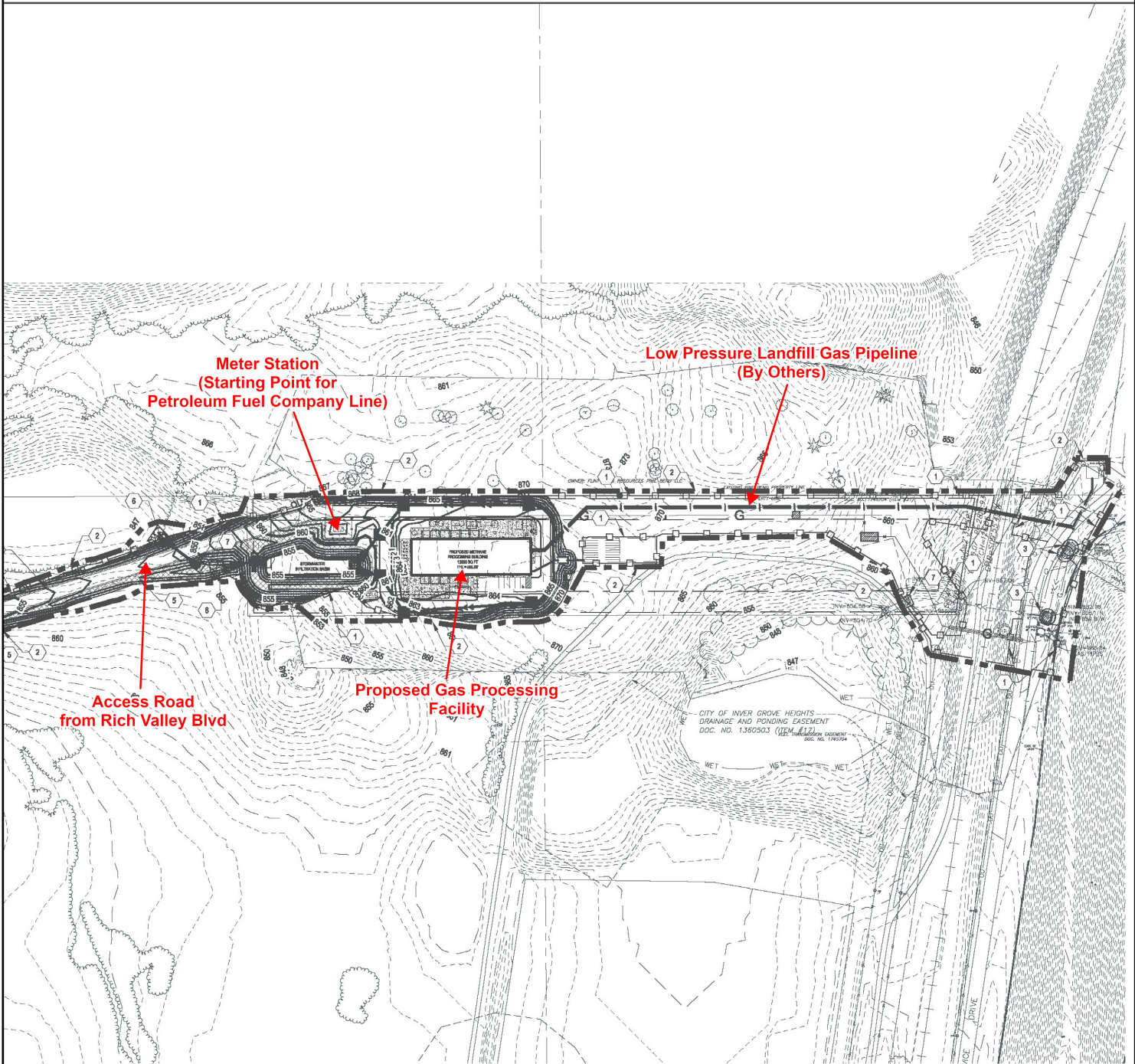
² PFC notes that Minn. Stat. § 216G.01 defines "pipeline" for which a route permit is required as limited to "a pipeline located in this state which is used to transport natural or synthetic gas at a pressure of more than 90 pounds per square inch, or to transport crude petroleum or petroleum fuels or oil or their derivatives, coal, anhydrous ammonia or any mineral slurry to a distribution center or storage facility which is located within or outside of this state." Further, a Processing Facility owned by a separate entity is not included within the definition of "associated facility" in Minn. R. § 7852.0100, Subp. 7.

PFC and WSB appreciate the constructive comments and recommendations filed by EERA, DNR and LIUNA. We look forward to satisfying any additional questions and concerns raised during the remainder of the process.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tim Johnston', written in a cursive style.

Tim Johnston, P.E.
Director of Pipeline Engineering
WSB



WARNING:
THE CONTRACTOR SHALL BE RESPONSIBLE FOR COOPERATING WITH ALL UTILITIES.
THE CONTRACTOR SHALL CONTACT ALL UTILITIES FOR THE LOCATIONS OF ALL UNRECORDED BURIED STRUCTURES BEFORE DIGGING DURING CONSTRUCTION AT NO LESS THAN 48 HOURS BEFORE THE START OF WORK.
CALL BEFORE YOU DIG
GOPHER STATE
TWIN CITIES
TOLL FREE

Figure 10 - Low Pressure Landfill Gas Line and Renewable Natural Gas Processing Facility



Pine Bend Pipeline
PFC
Docket No. IP-7042/PPL-20-872



**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

In the Matter of the Application of PFC) Docket No. IP-7042/PPL-20-872
Midstream for a Pipeline Route Permit for the)
Pine Bend Landfill Gas project) **CERTIFICATE OF SERVICE**
)

The undersigned hereby certifies that a true and correct copy of **PFC's Responses to Comments**, has been served today by e-mail and/or U.S. Mail to the following:

Name	Email/Address	Delivery Method
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Dated this 25th day of January, 2021

/s/ Tammy J. Krause

Tammy J. Krause