

January 5, 2025

Will Seuffert, Executive Secretary

Minnesota Public Utilities Commission

121 7th Place East, Suite 350

St Paul, MN 55101-2147

Re: In the Matter of the Application for a route permit for the Northland Reliability Project 345kV Transmission Line

Docket Number: 22-415

First and foremost, we want it documented again, we oppose the applicant's Original Proposed Route segment in our area. The Cole Lake Way segment of the Proposed Route that deviates east off the existing transmission line ROW. The applicant proposed two options, both cut thru our property East of the existing transmission line. One continues north along Cole Lake Way (AA6), the other continues across Cole Lake Way through our neighbor's property before cutting north through wetlands (Original Proposed Route) then reconnecting with the existing transmission line ROW just south of the Mississippi River.

The Routes AA6 and Original Proposed Route places the Project within 500 ft of more residences than the Co-Location Maximization Route (AA3 or AA4 route). The residents impacted by either of these routes currently do not have a transmission line within that proximity. There has been consistent opposition to Route AA6 and the Original Proposed Route during public hearings and in the written comments by landowners who would be impacted.

Additionally, Route AA6 and applicants Original Proposed Route would require new rights of way for the Project and result in significantly greater impact to residential properties and wetlands. Selecting either of these routes would construct the Project on a new ROW corridor, leaving the existing transmission lines in their current location. Doing so, results in **two** transmission line corridors, and blocks several residences between those corridors. The Co-location Maximization

Route (AA3) would place the Project in the same corridor as the existing transmission lines, negating any new impact on the environment and residents.

The records indicate the EERA and DNR both support the Co-Location Maximization route in this segment of the Project, shown in EERA Appendix 3 to attachment D, Pg 7 of 19 OAH docket no. 21-2500-39822 and DNR docket no. 20241-21236601.

In OAH docket no. 21-2500-39822 Appendix 3 to attachment D, page 7 of 19 the EERA modified the applicants modified route (pink) to remain on existing transmission line ROW (green), as opposed to creating new transmission line corridors. The Cole Lake Way area is similar to the Elk River area in that both had residences opposing deviating off the existing transmission line ROW. In the Elk River area, the applicant found ways to support the opposition by consolidating lines. How is it any different in the Cole Lake Way area? The only difference is we are a smaller group of residences. Why can't the applicant choose to satisfy the opposing residents in the Cole Lake Way area, choose to do the right thing and stop their proposed route from deviating off the existing transmission line ROW? (See attached map)

The applicant states, in response to many public comments, the concern of the high voltage power line decreasing property values is not supported by their research. In our area of Cole Lake Way, the addition of high voltage power lines through the middle of our property would definitely handicap our property. It would affect the curb appeal and the salability thus affecting the overall market value.

The applicant is willing to negatively impact on an entire neighborhood when it is perfectly feasible to remain on the existing transmission line ROW. "Co-Location Maximization route best satisfies route permit criteria set forth in Minnesota Statute 216E.303" as stated by the ALJ. In fact, staying on the existing line ROW is preferred by the ALJ, EERA, DNR, local residences and is in fact the lowest cost to construct. The higher costs are attributed to consolidating the existing lines. Would this not be an investment in future reliability, safety, and maintenance of those lines?

Conclusion:

- 1 – Support Co-Location Maximization Route in the Cole Lake Way region.
- 2 – Oppose applicants Original Proposed Route in Cole Lake Way region where line deviates east from existing transmission lines impacting more residences.
- 3 – “Co-Location Maximization Route best satisfies route permit criteria” per ALJ
- 4 – Co-Location Maximization Route is preferred by the EERA
- 5 – Co-Location Maximization Route is preferred by the DNR

Applicant has the opportunity to do this right the first time, lets ensure it's the proper investment into the future of the transmission lines over all – not just for Applicants single 345kV transmission line project.

Questions for the Applicant

1. If Co-Location Maximization Route is approved, is the new 3000 foot route ROW as requested still necessary? If so, why?
2. If Applicant can support consolidating lines in other areas because of residential opposition, why can't the Applicant also support consolidating lines in the Cole Lake Way area?

Thank you for your consideration.

Don and Marie Boucher

