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April 22, 2016

**VIA ELECTRONIC FILING**

Mr. Daniel P. Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
121 Seventh Place East, Suite 350  
Saint Paul, MN 55101-2147

**Re: In the Matter of the Application of Great River Energy for a Route Permit for the Bull Moose 115 kV Project in Cass County, Minnesota  
MPUC Docket No. ET2/TL-15-628**

Dear Mr. Wolf:

Great River Energy (“Applicant”) submits the following recommended revisions to the Route Permit Template for the proposed Bull Moose 115 kV transmission project in Cass County (the “Project”) previously filed in the above-referenced docket. The following recommended revisions are consistent with Applicant’s comments concerning the route permits for the Menahga (Docket No. 14-787) and Motley (Docket No. 15-204) projects.

**Recommended Revisions**

**Section 5.2.5.** To the extent practicable, cConstruction and routine maintenance activities shall be limited to daytime working hours, as defined in Minn. R. 7030.0200, to ensure nighttime noise level standards are not exceeded.

*Reason for change:* Construction activities will primarily occur during normal daytime working hours. However, some activities may need to be conducted outside of normal daytime working hours due to agency or electrical system requirements. For example, the Minnesota Department of Transportation may require that any road closure necessary for stringing conductors across the road occurs after normal business hours. Lastly, future emergency maintenance activities are done as expeditiously as possible in order to restore electrical services. If a line were damaged by a storm, Applicant is committed to repair the line and return it to service even if the work requires nighttime activities. This revision is consistent with a similar provision in the Motley Route Permit.

**Section 5.2.17.** The Permittee shall fairly restore or compensate landowners for damage to crops, fences, private roads and lanes . .

*Reason for change:* Applicant proposes this change to provide flexibility to landowners and Applicants in resolving damages arising from construction of the Project. This revision was incorporated into the Menahga Permit.

**Section 9.4.** Within ~~60~~ 90 days after completion of construction, the Permittee shall submit copies of all final as-built plans and specifications developed during the Project.

*Reason for change:* Applicant suggests this change to be consistent with the Menahga Permit. In that proceeding, Applicant suggested that this provision be revised to allow 180 days to file as-built plans, but a 90 day requirement was placed in the permit. Applicant continues to believe that a 90 day requirement is not generally reasonably feasible, but propose this change to conform to the Menahga Permit.

**Section 9.5.** Within ~~60~~ 90 days after completion of construction, the Permittee shall submit to the Commission, in the format requested by the Commission, geo-spatial information . . . .

*Reason for change:* While GPS data can sometimes be obtained within 60 days of Project completion, GPS and as-built plans and specifications are typically submitted jointly, and Applicant requests it be allowed to do so here. As noted above, Applicant continues to believe that a 90 day requirement is not feasible, but propose this change to conform to the Menahga Permit.

### **Closing**

Applicant appreciates the opportunity to submit these comments on the Route Permit Template. Should you have any questions, please contact me at (763) 445-5214. A copy of this filing is also being served upon the persons on the Official Service List of record.

Sincerely,

GREAT RIVER ENERGY



Carole L. Schmidt  
Supervisor, Transmission Permitting and Compliance