

Minnesota Public Utilities Commission
Staff Briefing Papers

Meeting Date: October 2, 2014.....Agenda Item *_

Company: Odell Wind Farm, LLC

Docket No. IP-6914/TL-13-591

In the Matter of the Application of Odell Wind Farm, LLC for a Route Permit
for the Odell Wind Farm High Voltage Transmission Line Project in
Cottonwood, Jackson, and Martin Counties

Issue(s): Should the Commission find that the environmental assessment and the record created at the public hearing adequately address the issues identified in the scoping decision? Should the Commission adopt the Administrative Law Judge Report? Should the Commission issue a route permit identifying a specific route and permit conditions for the Odell Wind Farm High Voltage Transmission Line Project?

Staff: Michael Kaluzniak | 651-201-2257 | mike.kaluzniak@statate.mn.us

Relevant Documents

Odell Wind Farm, LLC Application for a Route Permit	December 12, 2013
EERA Scoping Decision	April 17, 2014
Odell Wind Farm, LLC Change to Route in Permit Application	June 6, 2014
EERA Environmental Assessment Report.....	July 1, 2014
Odell Wind Farm, LLC Testimony of Jordan Burmeister	July 8, 2014
Odell Wind Farm, LLC Proposed Findings of Fact	July 23, 2014
Department of Natural Resources Comments	July 23, 2014
EERA Comments and Analysis	August 13, 2014
Odell Wind Farm, LLC Revised Proposed Findings & Recommendations	August 13, 2014
ALJ Report	August 25, 2014
Odell Wind Farm, LLC Exceptions to ALJ Report	September 4, 2014
EERA Exceptions to ALJ Report	September 15, 2014

Attached Documents

Attachment A – Proposed Exceptions to ALJ Report
Proposed High Voltage Transmission Line Route Permit

The attached materials are work papers of the Commission staff. They are intended for use by the Minnesota Public Utilities Commission and are based upon information already in the record unless noted otherwise.

Statement of the Issues

Should the Commission find that the environmental assessment and the record created at the public hearing adequately address the issues identified in the scoping decision? Should the Commission adopt the Administrative Law Judge Report? Should the Commission issue a route permit identifying a specific route and permit conditions for the Odell Wind Farm High Voltage Transmission Line Project?

Project Overview

The applicant has requested a route permit to construct a new 9.5-mile 115 kV high voltage transmission line and associated facilities in Cottonwood, Jackson, and Martin Counties, Minnesota, from the planned Odell Wind Farm Substation in Cottonwood County to the proposed Woad Hill Substation in Martin County (the Project).

The Project will facilitate interconnection to the 200-megawatt (MW) Odell Wind Farm located in Cottonwood, Jackson, Watonwan, and Martin counties.¹ The new transmission line would be constructed on private land adjacent to existing public road rights-of way (ROW). The Odell Wind Farm will deliver energy via underground 34.5 kV collector lines from the Odell Wind Farm turbines to the Odell Wind Farm substation. The collector system voltage will then be stepped up from 34.5 kV to 115 kV and transmitted on the Project's 115 kV transmission line to the new 345/115kV Woad Hill Substation.

¹ The Commission granted a site permit for the Odell Wind Farm on July 17, 2014 in Docket Number IP-6914/WS-13-843.

Procedural History

On December 12, 2013, Odell Wind Farm, LLC (Odell) filed a route permit application under the alternative permitting process for a 115 kV High Voltage Transmission Line Project in Cottonwood, Jackson, and Martin Counties.²

On February 4, 2014, the Commission issued its Order Finding Application Complete and Referring the Matter to the Office of Administrative Hearings for summary proceedings under Minn. R. 7850.3800, to develop the record. The Commission also authorized Commission staff to name a public advisor and determined that an advisory task force was not necessary at that time.

On February 10, 2014, a public information and environmental assessment scoping meeting was held at the Community Center in Windom, Minnesota.

On April 17, 2014, the deputy commissioner of the Department of Commerce issued the scoping decision for the environmental assessment.

On June 16, 2014, Odell filed a Change to Route Permit Application with the Commission.

On July 1, 2014, the Department of Commerce Energy Facility Permitting (Department EERA) filed its environmental assessment on the project.

On July 9, 2014, a public hearing was held before an administrative law judge (ALJ) at the Community Center in Windom, Minnesota.

On August 25, 2014, the Office of Administrative Hearings filed the ALJ's Findings of Fact, Conclusions of Law and Recommendation.

Exceptions to the ALJ Report were received from Odell on September 4, 2014.

Late-filed exceptions to the ALJ Report were received from the Department EERA on September 15, 2014.

Statutes and Rules

Under Minn. Stat. § 216E.03, subd. 1, "No person may construct a high-voltage transmission line without a route permit from the commission. A high-voltage transmission line may be constructed only along a route approved by the commission."

² Minn. Stat. § 216E.04; Minn. R. 7850.2800 to 7850.3900.

Minn. Stat. § 216E.01, subd. 4, defines a high-voltage transmission line as “...a conductor of electric energy and associated facilities designed for and capable of operation at a nominal voltage of 100 kilovolts or more and is greater than 1,500 feet in length.”

The project, as proposed by Odell Wind Farm, LLC would consist of an approximately 9.5-mile long 115,000 kilovolt (115 kV) transmission line between the proposed 115/34.5 kV project substation for the Odell Wind Farm and the proposed Woad Hill Substation (the “HVTL Project”), and therefore requires a route permit from the Commission.

The proposed project qualifies for alternative review under Minn. Stat. § 216E.03 because it meets the requirements of Minnesota Rule 7850.2800, subp. 1(C), which allows for permitting under the alternative process if the HVTL project is capable of operating between 100 kV and 200 kV but less than five miles in length. The alternate review process is a six month process that does not require the applicant to propose alternative routes.

The proposed project is subject to Minn. Stat. § 216E which requires that high-voltage transmission lines be routed consistent with state policy and in a manner that “minimizes adverse human and environmental impact while insuring continuing electric power system reliability and integrity and insuring that electric energy needs are met and fulfilled in an orderly and timely fashion.” The statute also grants the Commission the authority to specify the design, routing, right-of-way preparation, and facility construction it deems necessary, along with any other appropriate conditions when issuing a permit for a high-voltage transmission line.

Minn. Stat. § 216E.04, subd. 5 requires the commissioner of the Department of Commerce to prepare an environmental assessment on proposed high-voltage transmission lines. The environmental assessment must contain information on the potential human and environmental impacts of a proposed project and of alternative sites or routes considered and must address mitigation measures for identified impacts.

Under Minn. Stat. § 216B.243, subd. 2, “No large energy facility shall be sited or constructed in Minnesota without the issuance of a certificate of need by the commission...” Because the proposed 115 kV transmission line is less than ten miles in length, and does not cross a state border, a certificate of need is not required.

Environmental Assessment

On April 17, 2014, the Department EERA filed the environmental assessment scoping decision in accordance with Minn. R. 7850.3700. The scoping decision identified the issues to be addressed including routes; specific potential project impacts; and a schedule for completion of the environmental assessment.

On July 1, 2104, the Department EERA filed the environmental assessment on the proposed project in accordance with Minn. R. 7850.3700. The environmental assessment contained a comprehensive description of the proposed project; a discussion of potential impacts of the project on the human and natural environment; reasonable mitigation measures that could be implemented to minimize any identified adverse impacts; and required permits and approvals.

Public Hearing

Administrative Law Judge Steven Mihalchick with the Office of Administrative Hearings presided over a public hearing conducted on July 9, 2014, at the Community Center in Windom, Minnesota.

The hearing procedures included a brief presentation to describe the proposed project; an explanation of the process to be followed; introduction of documents to be included in the record; and an opportunity for any person to present comments and to ask questions of the applicant, the Department EERA, and commission staff. A court reporter was present to transcribe the public hearing.

Members of the public who spoke at the public hearing supported the project. Following the public hearing, a comment period for submission of written comments into the record was open until July 23, 2014.

Administrative Law Judge Report

On August 25, 2014 the ALJ filed his Findings of Fact, Conclusions of Law and Recommendation (ALJ Report). The ALJ concluded that the environmental assessment prepared by the Department EERA was appropriate and satisfied the requirements of Minn. R. 7850.3900. The ALJ recommended that the Commission issue a Route Permit for the proposed HVTL including the additional route area proposed by Odell near the Woad Hill Substation.

The ALJ stated that the Route Permit should include a condition that Odell obtain a DNR License to Cross Public Lands and Waters for the two crossings of Cedar Creek. Additionally, the ALJ recommended that the Route Permit should require Odell to obtain all required local, state, and federal permits and licenses, to comply with the terms of those permits or license, and to comply with all applicable rules and regulations.

Exceptions to ALJ Report

On September 4, 2014, Odell filed exceptions to the ALJ Report. The exceptions proposed altered several Findings of Fact and Recommendations to incorporate the changes in the geographic location of the Woad Hill Substation.

The Department EERA filed their exceptions to the ALJ Report on Monday, September 15, 2014. The exceptions indicated agreement with Odell's proposed changes in relation to the location of the Woad Hill Substation.

Staff Discussion

Commission staff has reviewed the record including Odell Wind Farm, LLC's route permit application, the Environmental Assessment, comments and briefs, as well as the report of the administrative law judge. Staff agrees with the recommendations of the ALJ, the Applicant and the Department EERA with the minor modifications discussed below.

A. Environmental Assessment Completeness

Staff has reviewed the environmental assessment and agrees with the ALJ that the Department EERA has conducted an appropriate environmental analysis of the project for purposes of this route permit proceeding and that the environmental assessment satisfies Minn. R. 7850.3700, subp. 4. Specifically, the environmental assessment and the record created at the public hearing addresses the issues identified in the scoping decision.

B. Exceptions to ALJ Report

Staff reviewed the application focusing on the requirements under statute, rule and pertinent Commission Orders. Staff has enclosed analyses of the exceptions as Attachment A.

Commission Decision Alternatives

A. Environmental Assessment

1. Determine that the environmental assessment and the record created at the public hearing addresses the issues identified in the environmental assessment scoping decision.
2. Take some other action deemed appropriate.

B. Findings of Fact, Conclusions of Law and Recommendation

1. Approve and adopt the ALJ's Findings of Fact, Conclusions of Law and Recommendation for Odell Wind Farm High Voltage Transmission Line Project in Cottonwood, Jackson, and Martin counties.
2. Approve and adopt the ALJ's Findings of Fact, Conclusions of Law and Recommendation for Odell Wind Farm High Voltage Transmission Line Project in Cottonwood, Jackson, and Martin Counties as modified by the Applicant's proposed exceptions (see Attachment A).
3. Take some other action deemed appropriate.

C. Transmission Line Route Permit

1. Issue a high-voltage transmission line route permit to Odell Wind Farm, LLC identifying a specific route and permit conditions for the Odell Wind Farm High Voltage Transmission Line Project.
2. Take some other action deemed appropriate.

Staff Recommendation: A1, B2, and C1

Staff Recommendations on Exceptions to the 8/25/14 ALJ Report

Attachment A

Type/Number	Sponsor	Proposed Language	Incorporated by Staff	Reason for Accepting or Rejecting Change
Conclusion 2	Odell	<p>2. The Commission should grant Odell Wind Farm, LLC, a route permit to construct approximately 9.5 miles of new overhead 115 kV transmission line between the proposed project substation for the Odell Wind Farm and the proposed Woad Hill Substation and to construct the Woad Hill Substation.</p> <p>a. Approximately 9.5 miles of new overhead 115 kV transmission line between the proposed project substation for the Odell Wind Farm and the proposed Woad Hill Substation. The Project will extend from the new Odell Wind Farm Substation, located in Section 32 of Mountain Lake Township in Cottonwood County, to the new Woad Hill Substation, in Section 8 or Section 16 of Cedar Township in Martin County. The HVTL line originates at the Odell Wind Farm Substation and heads east along County Highway 17 to Jackson County Highway 85/600th Avenue. The Project then turns to run south for approximately one mile. The Project then turns to run east along Jackson County's 930th Street where, after approximately one mile, it crosses into Martin County and continues east along 240th Street for approximately two miles until the intersection of 240th Street and 30th Avenue. The Project turns South for the final time on 30th Avenue, ending approximately one and a half miles south at the proposed Woad Hill Substation at the intersection of 30th Avenue and 230th Street in Martin County. The route width for the transmission line is between 150 and 600 feet. For the majority of the Proposed Route, the route width is 150 feet extending from the road centerline. In Sections 1 and 12 of T104 R34 in Jackson County, the route width is 300 feet, 150 feet on each side of the road centerline. In Sections 6 and 7 of T104 R33 in Martin County, the route width is 600 feet; and,</p>	Yes	<p>The northwest quadrant of the intersection of 230th Street and 30th Avenue is in Section 8 and the proposed Woad Hill Substation may be located in Section 8 or Section 16 depending upon discussions with Xcel Energy. Changes clarify the potential locations of the proposed Woad Hill Substation in Cedar Township, Martin County.</p>

Staff Recommendations on Exceptions to the 8/25/14 ALJ Report

Attachment A

		<p>b. The Woad Hill Substation, which will be a 345/115 kV substation on the Lakefield Generation-Fieldon segment of Xcel Energy's Lakefield Junction- Wilmarth 345 kV transmission line. The Woad Hill Substation will be located in Section 8 or Section 16 of Cedar Township in Martin County at the intersection of 230th Street and 30th Avenue with the final configuration determined during discussions and negotiations between the Applicant and Xcel Energy.</p>		
Finding 3	Odell	<p>3. The Proposed Route of the Project extends from the new Odell Wind Farm substation located in Section 32 of Mountain Lake Township in Cottonwood County and heads east along County Highway 17 to Jackson County Highway 85/600th Avenue. The Proposed Route then turns to run south for approximately one mile. The Proposed Route then turns to run east along Jackson County's 930th Street where, after approximately one mile, it crosses into Martin County and continues east along 240th Street for approximately two miles until the intersection of 240th Street and 30th Avenue. The Proposed Route turns south for the final time on 30th Avenue, ending approximately one and a half miles south at the proposed Woad Hill Substation at the intersection of 30th Avenue and 230th Street in Section 8 or Section 16 of Cedar Township in Martin County.</p>	Yes	As above.
Finding 4	Odell	<p>4. The Woad Hill Substation was originally proposed for the southeast corner of the intersection of 230th Street and 30th Avenue in Section 16 of Cedar Township. In design discussions with Xcel Energy, which owns the transmission line to which the Woad Hill Substation will connect, it was determined that the placement of the Woad Hill Substation in the southeast corner of the intersection of 230th Street and 30th Avenue may not be practicable due to Xcel Energy's internal design spacing</p>	Yes, upon further modification	On June 6, 2014, Odell Wind Farm, LLC requested a slight modification of the route to accommodate the option of locating the Woad Hill Substation at this location; but did not provide alternative

Staff Recommendations on Exceptions to the 8/25/14 ALJ Report

Attachment A

		requirements for substations and switchyards. Ongoing discussions between Odell and Xcel Energy have resulted in the need for Odell to investigate the option of locating the Woad Hill Substation in the northwest quadrant of the intersection of 230 th Street and 30th Avenue in Section 16 <u>8</u> . Odell submitted a request to the Commission to modify the route slightly to accommodate the option of locating the Woad Hill Substation there instead.		language.
Finding 54	Odell	54. Mr. Davis of EERA testified at the public hearing that the option presented by Odell to locate the Woad Hill Substation in the northwest quadrant of the intersection of 230th Street and 30th Avenue in Section 16 <u>8</u> would address the DNR's request to keep the Woad Hill Substation as far from Cedar Creek as practicable. 57	Yes	As above in items 2, 3 & 4.

Proposed text to be added is indicated in blue underlined text.

Proposed deletion of text is indicated in ~~red stricken text~~.

In addition, Staff's recommended additions are included in green underlined text.

For purposes of brevity, not all footnotes to the findings are included.

Minor irregularities in numbering caused by software editing should be considered de minimis.

STATE OF MINNESOTA PUBLIC UTILITIES COMMISSION

**ROUTE PERMIT FOR CONSTRUCTION OF A HIGH-VOLTAGE TRANSMISSION
LINE AND ASSOCIATED FACILITIES**

**IN
COTTONWOOD, JACKSON AND MARTIN COUNTIES**

**ISSUED TO
ODELL WIND FARM, LLC**

PUC DOCKET NUMBER IP-6914/TL-13-591

In accordance with the requirements of Minnesota Statutes Chapter 216E and Minnesota Rules Chapter 7850 this route permit is hereby issued to:

ODELL WIND FARM, LLC

Odell Wind Farm, LLC is authorized by this route permit to construct 9.5 miles of single circuit overhead 115 kilovolt (kV) High Voltage Transmission Line, up to 1,500 feet of a single 345 kV High Voltage Transmission Line, the Woad Hill Substation in Martin County, and associated facilities.

The transmission line and associated facilities shall be built within the route identified in this permit and as portrayed on the official route maps, and in compliance with the conditions specified in this permit.

Approved and adopted this ____ day of October, 2014

BY ORDER OF THE COMMISSION

Burl W. Haar,
Executive Secretary

CONTENTS

1.0	ROUTE PERMIT	3
1.1	Pre-emption	3
2.0	PROJECT DESCRIPTION	3
2.1	Project Location	3
2.2	Associated Facilities.....	3
2.2.1	Substations	4
2.2.2	Structures.....	4
2.2.3	Conductors	5
3.0	DESIGNATED ROUTE	5
3.1	Right-of-Way	6
4.0	GENERAL CONDITIONS.....	6
4.1	Notification to Landowners.....	6
4.2	Construction Practices.....	7
4.2.1	Field Representative.....	7
4.2.2	Employee Training and Education of Permit Terms and Conditions	7
4.2.3	Public Services, Public Utilities, and Existing Easements.....	7
4.2.4	Temporary Work Space	8
4.2.5	Noise.....	8
4.2.6	Aesthetics	8
4.2.7	Vegetation Removal and Protection.....	9
4.2.8	Application of Herbicides	9
4.2.9	Noxious Weeds	9
4.2.10	Site Sediment and Erosion Control	9
4.2.11	Wetlands and Water Resources.....	10
4.2.12	Archaeological and Historic Resources	11
4.2.13	Avian Mitigation	11
4.2.14	Restoration	11
4.2.15	Cleanup.....	12
4.2.16	Pollution and Hazardous Wastes.....	12
4.2.17	Damages	12
4.3	Electrical Performance Standards	12
4.3.1	Grounding.....	12
4.3.2	Electric Field	12
4.3.3	Interference with Communication Devices.....	13
4.4	Other Requirements.....	13
4.4.1	Applicable Codes	13
4.4.2	Other Permits and Regulations.....	13
5.0	SPECIAL CONDITIONS	13

5.1	Wildlife-Friendly Erosion Control Materials	13
5.2	Rare and Unique Resources	14
6.0	DELAY IN CONSTRUCTION	14
7.0	COMPLAINT PROCEDURES	14
8.0	COMPLIANCE REQUIREMENTS	14
8.1	Plan and Profile	15
8.2	Periodic Status Reports	15
8.3	Completion of Construction	15
8.3.1	Notification to Commission	15
8.3.2	As-Built Plans and Specifications	15
8.3.3	GPS Data	16
9.0	PERMIT AMENDMENT	16
10.0	TRANSFER OF PERMIT	16
11.0	REVOCAION OR SUSPENSION OF PERMIT	16

FIGURES

Route Maps

ATTACHMENTS

Attachment A – Complaint Procedures for High-Voltage Transmission Lines

Attachment B – Compliance Filing Procedure for Permitted Energy Facilities

1.0 ROUTE PERMIT

The Minnesota Public Utilities Commission (Commission) hereby issues this route permit to Odell Wind Farm, LLC (Permittee) pursuant to Minnesota Statutes Chapter 216E and Minnesota Rules Chapter 7850. This permit authorizes the Odell Wind Farm, LLC to construct up to 9.5 miles of single circuit overhead 115 kilovolt (kV) High Voltage Transmission Line (HVTL) and up to 1,500 feet of a single 345 kV High Voltage Transmission Line, and as identified in the attached route permit maps, hereby incorporated into this permit.

1.1 Pre-emption

Pursuant to Minn. Stat. § 216E.10, this route permit shall be the sole approval required to be obtained by the Permittee for construction of the transmission facilities and this permit shall supersede and preempt all zoning, building, or land use rules, regulations, or ordinances promulgated by regional, county, local and special purpose governments.

2.0 PROJECT DESCRIPTION

The Project includes construction of approximately 9.5 miles of 115 kV high voltage transmission line, and associated facilities, including a 1,500-foot 345 kV HVTL, in Cottonwood, Jackson, and Martin counties, Minnesota, beginning at the planned Odell Wind Farm Substation in Cottonwood County to the proposed Woad Hill Substation in Martin County (the Project). The Project will provide interconnection to the 200-megawatt (MW) Odell Wind Farm located in Cottonwood, Jackson, Watonwan, and Martin Counties.

2.1 Project Location

The Project area includes the following locations:

County	Township Name	Township	Range	Section
Cottonwood	Mountain Lake	105N	34W	32,33,34,35,36
Jackson	Kimball	104N	34W	1,2,3,4,5,11,12
Martin	Cedar	104N	34W	4,5,6,7,8,9,16,17

2.2 Associated Facilities

The transmission line and associated facilities shall be designed to meet or exceed all relevant local and state codes, the National Electric Safety Code (NESC), and North American Electric Reliability Corporation (NERC) requirements.

This includes standards relating to clearances to ground, clearance to crossing utilities, clearance to buildings, strength of materials, clearances over roadways, right-of-way widths, and permit requirements. The transmission line shall be equipped with protective devices to safeguard the public if an accident occurs.

2.2.1 Substations

The new Woad Hill Substation will be constructed east of 30th Avenue and south of 230th Street in Section 8 or Section 16 of Cedar Township in Martin County. The substation will consist of supporting structures for high voltage electrical structures, breakers, transformers, lightning protection, and control equipment. The area around the substation will be fenced with driveway access from the east and north. The ground within the substation will be graded and secondary containment areas for the transformer will be installed as necessary. Gravel will be placed on the surface of the ground in and around the substation to assist with weed control. The Woad Hill Substation will take up approximately 10 acres of land.

2.2.2 Structures

The Permittee will use wood and/or T steel structures capable of handling a single-circuit load by constructing the single-circuit transmission line on wood and/or steel monopole structures, direct-embedded in approximately 3-foot diameter holes augured to a depth of approximately fourteen percent of the total structure height, or approximately 9 to 14 feet. Pole structures will be located approximately 350 to 400 feet apart.

Final design and geotechnical investigations may warrant the use of special structures to avoid sensitive areas or to accommodate special engineering circumstances. Structure installations may require special engineering techniques in some locations, due to hydric soils, near and above surface bedrock, and other subsurface conditions. The near and above surface bedrock design and construction would typically involve using specialized drilling equipment to bore a hole directly into the bedrock. The need for self-supporting angle and dead-end or atypical structures will be determined during final design.

The table below identifies the structure types as presented in the route permit application.

Line Type	Conductor	Structure		Foundation	Approximate Height	Approximate Span
		Type	Material			
115 kV	1272 kcmil ACSR	Monopole	Wood	Direct embed	65-70 feet	400 feet
		Self-Supporting	Steel	Drilled Pier Concrete Foundation ¹		

2.2.3 Conductors

The conductor for each of the three phases of the 115 kV line will be 1272 kcmil (one thousand circular mils) ACSR (Aluminum Conductor Steel Reinforced) “Bittern” transmission line.

3.0 DESIGNATED ROUTE

The route designated by the Commission in this permit is the route described below and shown on the route maps attached to this permit. The route is generally described as follows:

The Project will connect the Odell Wind Farm Substation, extend approximately four miles to the east adjacent to County Highway 17, turn south and extend south into Jackson County for approximately one mile adjacent to County Road 85, then extend east for approximately three miles adjacent to 240th Street in Martin County, and turn south adjacent to 30th Avenue for approximately 1.5 miles ultimately terminating at the proposed Woad Hill Substation in Section 8 or Section 16 of Cedar Township in Martin County. The proposed Woad Hill Substation will be a new 345/115 kV substation on Northern States Power’s Lakefield Junction-Wilmarth 345 kV transmission line.

The Project will utilize a variable 150 to 600 foot route width. The majority of the Route will be 150 feet wide extending from the road centerline. The route width in Sections 1 and 12 of Kimball Township in Jackson County will be 300 feet, extending 150 feet on both sides of the road centerline in order to provide flexibility to accommodate distances from home. The route width in Sections 6 and 7 of Cedar Township in Martine County will be 600 feet to allow flexibility to work around a known easement title issues.

¹ Drilled pier concrete foundations will be used for steel corner/dead-end structures if guying is not possible.

The identified route widths will provide the Permittee with flexibility for minor adjustments of the specific alignment or right-of-way to accommodate landowner requests and unforeseen conditions. The final alignment (i.e., permanent and maintained rights-of-way) will be located within this designated route unless otherwise authorized below.

3.1 Right-of-Way

The approved right-of-way for the project is up to 130 feet. The transmission easements for the Project include a strip of land that is 80 feet wide parallel and adjacent to the existing road right-of-way, and a strip of land comprising one-half of the existing road right-of-way. The road rights-of-way are generally 66 feet for township roads or 100 feet for county roads. The total easement width is 113 feet along township roads and 130 feet along county roads.

This permit anticipates that the right-of-way will generally conform to the anticipated alignment as noted on the attached route permit maps unless changes are requested by individual landowners and agreed to by Permittee or for unforeseen conditions that are encountered or are otherwise provided for by this permit.

Any right-of-way modifications within the designated route shall be located so as to have comparable overall impacts relative to the factors in Minn. R. 7850.4100, as does the right-of-way identified in this permit, and shall be specifically identified and documented in and approved as part of the plan and profile submitted pursuant to Section 8.1 of this permit.

Where the transmission line route parallels existing highway and other road rights-of-way, the transmission line right-of-way shall occupy and utilize the existing right-of-way to the maximum extent possible, consistent with the criteria in Minn. R. 7850.4100, the other requirements of this permit, and for highways under the jurisdiction of the Minnesota Department of Transportation (Mn/DOT) rules, policies, and procedures for accommodating utilities in trunk highway rights-of-way.

4.0 GENERAL CONDITIONS

The Permittee shall comply with the following conditions during construction of the transmission line and associated facilities over the life of this permit.

4.1 Notification to Landowners

The Permittee shall provide all affected landowners with a copy of this permit and, as a separate information piece, the complaint procedures at the time of the first contact with the landowners after issuance of this permit.

The Permittee shall contact landowners prior to entering the property or conducting maintenance along the route.

The Permittee shall work with landowners to locate the high-voltage transmission line to minimize the loss of agricultural land, forest, and wetlands, and to avoid homes and farmsteads.

4.2 Construction Practices

The Permittee shall follow those specific construction practices and material specifications described in the Odell Wind Farm, LLC Application to the Commission for a route permit for the Odell Wind Farm, dated December 12, 2013, as amended by the June 6, 2014 Request for Route Width Expansion unless this permit establishes a different requirement in which case this permit shall prevail.

4.2.1 Field Representative

At least 14 days prior to commencing construction, the Permittee shall advise the Commission in writing of the person or persons designated to be the field representative for the Permittee with the responsibility to oversee compliance with the conditions of this permit during construction. This person shall be accessible by telephone during normal business hours throughout right-of-way preparation, construction, cleanup, and restoration.

The field representative's address, phone number, emergency phone number, and email shall be provided to the Commission and to affected landowners, residents, public officials and other interested persons. The Permittee may change the field representative at any time upon notice to landowners and the Commission.

4.2.2 Employee Training and Education of Permit Terms and Conditions

The Permittee shall inform all employees, contractors, and other persons involved in the transmission line construction of the terms and conditions of this permit.

4.2.3 Public Services, Public Utilities, and Existing Easements

During construction, the Permittee shall minimize any disruption to public services or public utilities. To the extent disruptions to public services or public utilities occur these would be temporary and the Permittee will restore service promptly. Where any impacts to utilities have the potential to occur the Permittee will work with both landowners and local agencies to determine the most appropriate transmission structure placement.

The Permittee shall work with the landowners, townships, cities, and counties along the route to accommodate concerns regarding tree clearing, distance from existing structures, drain tiles, pole depth and placement in relationship to existing roads and road expansion plans.

The Permittee shall cooperate with county and city road authorities to develop appropriate signage and traffic management during construction.

4.2.4 Temporary Work Space

The Permittee shall limit temporary easements to special construction access needs and additional staging or lay-down areas required outside of the authorized right-of-way. Temporary space shall be selected to limit the removal and impacts to vegetation. Temporary easements outside of the authorized transmission line right-of-way will be obtained from affected landowners through rental agreements and are not provided for in this permit.

Temporary driveways may be constructed between the roadway and the structures to minimize impact using the shortest route possible. Construction mats should also be used to minimize impacts on access paths and construction areas.

4.2.5 Noise

Construction and routine maintenance activities shall be limited to daytime working hours, as defined in Minn. R. 7030.0200, to ensure nighttime noise level standards will not be exceeded.

4.2.6 Aesthetics

The Permittee shall consider input pertaining to visual impacts from landowners or land management agencies prior to final location of structures, rights-of-way, and other areas with the potential for visual disturbance. Care shall be used to preserve the natural landscape, minimize tree removal and prevent any unnecessary destruction of the natural surroundings in the vicinity of the project during construction and maintenance.

Structures shall be placed at a distance, consistent with sound engineering principles and system reliability criteria, from intersecting roads, highway, or trail crossings and could cross roads to minimize or avoid impacts.

4.2.7 Vegetation Removal and Protection

The Permittee shall minimize the number of trees to be removed in selecting the right-of-way specifically preserving to the maximum extent practicable windbreaks, shelterbelts, living snow fences, and vegetation in areas such as trail and stream crossings where vegetative screening may minimize aesthetic impacts, to the extent that such actions do not violate sound engineering principles or system reliability criteria.

Tall growing species located within the transmission line right-of-way that endanger the safe and reliable operation of the transmission facility will be removed by the Permittee.

The Permittee shall leave undisturbed, to the extent possible, existing low growing species in the right-of-way or replant such species in the right-of-way to blend the difference between the right-of-way and adjacent areas, to the extent that the low growing vegetation that will not pose a threat to the transmission facility or impede construction.

4.2.8 Application of Herbicides

The Permittee shall restrict herbicide use to those herbicides and methods of application approved by the Minnesota Department of Agriculture and the U.S. Environmental Protection Agency. Selective foliage or basal application shall be used when practicable. The Permittee shall contact the landowner or his designee to obtain approval for the use of herbicide prior to any application on their property. The landowner may request that there be no application of herbicides on any part of the right-of-way within the landowner's property. All herbicides shall be applied in a safe and cautious manner so as not to damage crops, orchards, tree farms, or gardens.

4.2.9 Noxious Weeds

The Permittee shall take all reasonable precautions against the spread of noxious weeds during all phases of construction. When utilizing seed to establish temporary and permanent vegetative cover on exposed soil, the Permittee shall select site appropriate seed certified to be free of noxious weeds. To the extent possible, the Permittee shall use native seed mixes. The Permittee shall consult with landowners on the selection and use of seed for replanting.

4.2.10 Site Sediment and Erosion Control

The Permittee shall implement those erosion prevention and sediment control practices recommended by the Minnesota Pollution Control Agency (MPCA) Construction Stormwater Program.

The Permittee shall implement reasonable measures to minimize erosion and sedimentation during construction and shall employ perimeter sediment controls, protect exposed soil by promptly planting, seeding, using erosion control blankets and turf reinforcement mats, stabilizing slopes, protecting storm drain inlets, protecting soil stockpiles, and controlling vehicle tracking. Contours shall be graded as required so that all surfaces provide for proper drainage, blend with the natural terrain, and are left in a condition that will facilitate re-vegetation and prevent erosion. All areas disturbed during construction of the facilities shall be returned to pre-construction conditions.

Where larger areas of one acre or more are disturbed or other areas designated by the MPCA, the Permittee shall obtain a National Pollutant Discharge Elimination System (NPDES)/State Disposal System (SDS) Construction Stormwater permit from the MPCA.

4.2.11 Wetlands and Water Resources

Wetland impact avoidance measures that shall be implemented during design and construction of the transmission line will include spacing and placing the power poles at variable distances to span and avoid wetlands, watercourses, and floodplains. Unavoidable wetland impacts as a result of the placement of poles shall be limited to the immediate area around the poles. To minimize impacts, construction in wetland areas shall occur during frozen ground conditions. When construction during winter is not possible, wooden or composite mats shall be used to protect wetland vegetation. Soil excavated from the wetlands and riparian areas shall be contained and not placed back into the wetland or riparian area.

Wetlands and riparian areas shall be accessed using the shortest route possible in order to minimize travel through wetland areas and prevent unnecessary impacts. No staging or stringing set up areas shall be placed within or adjacent to wetlands or water resources, as practicable. Power pole structures shall be assembled on upland areas before they are brought to the site for installation.

Areas disturbed by construction activities shall be restored to pre-construction conditions. Restoration of the wetlands will be performed by Permittee in accordance with the requirements of applicable state and federal permits or laws and landowner agreements.

All requirements of the U.S. Army Corps of Engineers (wetlands under federal jurisdiction), Minnesota Department of Natural Resources (Public Waters/Wetlands), and County (wetlands under the jurisdiction of the Minnesota Wetland Conservation Act) shall be met.

4.2.12 Archaeological and Historic Resources

The Permittee shall make every effort to avoid impacts to identified archaeological and historic resources when installing the high-voltage transmission line on the approved route. The Permittee shall consult with the Minnesota State Historic Preservation Office (SHPO) prior to commencing construction to determine whether an archaeological survey will be necessary for any length of the transmission line route.

In the event that a resource is encountered, the Permittee shall contact and consult with SHPO. The Permittee shall not excavate at such locations until authorization is provided by SHPO. Where feasible, avoidance of the resource is required. Where not feasible, mitigation must include an effort to minimize project impacts on the resource consistent with SHPO and State Archaeologist requirements. If human remains are encountered during construction, the Permittee shall immediately halt construction at that location and promptly notify local law enforcement authorities and the State Archaeologist.

Prior to construction, workers shall be trained about the need to avoid cultural properties, how to identify cultural properties, and procedures to follow if undocumented cultural properties, including gravesites, are found during construction.

4.2.13 Avian Mitigation

The Permittee's standard transmission design shall incorporate adequate spacing of conductors and grounding devices in accordance with Avian Power Line Interaction Committee standards to eliminate the risk of electrocution to raptors with larger wingspans that may simultaneously come in contact with a conductor and grounding devices. The Permittee will consult with the Minnesota Department of Natural Resources regarding type and placement of bird diverters.

4.2.14 Restoration

The Permittee shall restore the right-of-way, temporary work spaces, access roads, abandoned right-of-way, and other public or private lands affected by construction of the transmission line. Restoration within the right-of-way must be compatible with the safe operation, maintenance, and inspection of the transmission line. Within 60 days after completion of all restoration activities, the Permittee shall advise the Commission in writing of the completion of such activities.

4.2.15 Cleanup

All waste and scrap that is the product of construction shall be removed from the right-of-way and all premises on which construction activities were conducted and properly disposed of upon completion of each task. Personal litter, including bottles, cans, and paper from construction activities shall be removed on a daily basis.

4.2.16 Pollution and Hazardous Wastes

All appropriate precautions to protect against pollution of the environment must be taken by the Permittee. The Permittee shall be responsible for compliance with all laws applicable to the generation, storage, transportation, clean up and disposal of all wastes generated during construction and restoration of the right-of-way.

4.2.17 Damages

The Permittee shall fairly compensate landowners for damage to crops, fences, private roads and lanes, landscaping, drain tile, or other damages sustained during construction.

4.3 Electrical Performance Standards

4.3.1 Grounding

The Permittee shall design, construct, and operate the transmission line in a manner so that the maximum induced steady-state short-circuit current shall be limited to five milliamperes root mean square (rms) alternating current between the ground and any non-stationary object within the right-of-way, including but not limited to large motor vehicles and agricultural equipment. All fixed metallic objects on or off the right-of-way, except electric fences that parallel or cross the right-of-way, shall be grounded to the extent necessary to limit the induced short-circuit current between ground and the object so as not to exceed one milliamperes rms under steady state conditions of the transmission line and to comply with the ground fault conditions specified in the NESC. The Permittee shall address and rectify any induced current problems that arise during transmission line operation.

4.3.2 Electric Field

The transmission line shall be designed, constructed, and operated in such a manner that the electric field measured one meter above ground level immediately below the transmission line shall not exceed 8.0 kV/m rms.

4.3.3 Interference with Communication Devices

If interference with radio or television, satellite, wireless internet, GPS-based agriculture navigation systems or other communication devices is caused by the presence or operation of the transmission line, the Permittee shall take whatever action is feasible to restore or provide reception equivalent to reception levels in the immediate area just prior to the construction of the line.

4.4 Other Requirements

4.4.1 Applicable Codes

The Permittee shall comply with applicable NERC planning standards and requirements of the NESC including clearances to ground, clearance to crossing utilities, clearance to buildings, right-of way widths, erecting power poles, and stringing of transmission line conductors.

4.4.2 Other Permits and Regulations

The Permittee shall comply with all applicable state rules and statutes. The Permittee shall obtain all required permits for the project and comply with the conditions of these permits. A list of the permits known to be required is included in the permit application. The Permittee shall submit a copy of such permits to the Commission upon request.

5.0 SPECIAL CONDITIONS

The Permittee shall provide a report to the Commission as part of the plan and profile submission that describes the actions taken and mitigative measures developed regarding the project and the following special conditions. Special conditions shall take precedence over other conditions of this permit should there be a conflict.

5.1 Wildlife-Friendly Erosion Control Materials

The Permittee, in cooperation with the Minnesota Department of Natural Resources, shall use wildlife-friendly erosion control materials in areas known to be inhabited by wildlife species (birds, small mammals, reptiles, and amphibians) susceptible to entanglement in plastic netting.²

² <http://files.dnr.state.mn.us/eco/nongame/wildlife-friendly-erosion-control.pdf>

5.2 Rare and Unique Resources

The Permittee shall follow measures and recommendations for avoiding and minimizing impacts to Blanding's turtle populations as outlined in the Minnesota Department of Natural Resources Environmental Review Fact Sheet Series for the Blanding's Turtle.³ Construction and maintenance personnel will be made aware of rare resources and plant communities during pre-construction meetings to minimize potential disturbance. The Permittee shall avoid impacts to State-listed endangered, threatened, and special concern species in all areas of the project including temporary workspaces associated with the project.

6.0 DELAY IN CONSTRUCTION

If the Permittee has not commenced construction or improvement of the route within four years after the date of issuance of this permit the Permittee shall file a report on the failure to construct and the Commission shall consider suspension of the permit in accordance with Minn. R. 7850.4700.

7.0 COMPLAINT PROCEDURES

Prior to the start of construction, the Permittee shall submit to the Commission the procedures that will be used to receive and respond to complaints. The procedures shall be in accordance with the requirements of Minn. R. 7829.1500 or Minn. R. 7829.1700, and as set forth in the complaint procedures attached to this permit.

Upon request, the Permittee shall assist the Commission with the disposition of unresolved or longstanding complaints. This assistance shall include, but is not limited to, the submittal of complaint correspondence and complaint resolution efforts.

8.0 COMPLIANCE REQUIREMENTS

Failure to timely and properly make compliance filings required by this permit is a failure to comply with the conditions of this permit. Compliance filings must be electronically filed with the Commission.

³ http://files.dnr.state.mn.us/natural_resources/animals/reptiles_amphibians/turtles/blandings_turtle/factsheet.pdf

8.1 Plan and Profile

At least 30 calendar days before right-of-way preparation for construction begins on any segment or portion of the project, the Permittee shall provide the Commission with a plan and profile of the right-of-way and the specifications and drawings for right-of-way preparation, construction, structure specifications and locations, cleanup, and restoration for the transmission line.

The documentation shall include maps depicting the plan and profile including the right-of-way, alignment, and structures in relation to the route and alignment approved per this permit.

The Permittee may not commence construction until the 30 days has expired or until the Commission has advised the Permittee in writing that it has completed its review of the documents and determined that the planned construction is consistent with this permit. If the Permittee intends to make any significant changes in its plan and profile or the specifications and drawings after submission to the Commission, the Permittee shall notify the Commission at least five days before implementing the changes. No changes shall be made that would be in violation of any of the terms of this permit.

8.2 Periodic Status Reports

The Permittee shall report to the Commission on progress regarding finalization of the route, design of structures, and construction of the transmission line. The Permittee need not report more frequently than monthly.

8.3 Completion of Construction

8.3.1 Notification to Commission

At least three days before the line is to be placed into service, the Permittee shall notify the Commission of the date on which the line will be placed into service and the date on which construction was complete.

8.3.2 As-Built Plans and Specifications

Within 60 days after completion of construction, the Permittee shall submit copies of all final as-built plans and specifications developed during the project.

8.3.3 GPS Data

Within 60 days after completion of construction, the Permittee shall submit to the Commission, in the format requested by the Commission, geo-spatial information (e.g., ArcGIS compatible map files, GPS coordinates, associated database of characteristics) for all structures associated with the transmission line and each substation connected.

9.0 PERMIT AMENDMENT

This permit may be amended at any time by the Commission. Any person may request an amendment of the conditions of this permit by submitting a request to the Commission in writing describing the amendment sought and the reasons for the amendment. The Commission will mail notice of receipt of the request to the Permittee. The Commission may amend the conditions after affording the Permittee and interested persons such process as is required.

10.0 TRANSFER OF PERMIT

The Permittee may request at any time that the Commission transfer this permit to another person or entity. The Permittee shall provide the name and description of the person or entity to whom the permit is requested to be transferred, the reasons for the transfer, a description of the facilities affected, and the proposed effective date of the transfer.













The person to whom the permit is to be transferred shall provide the Commission with such information as the Commission shall require to determine whether the new Permittee can comply with the conditions of the permit. The Commission may authorize transfer of the permit after affording the Permittee, the new Permittee, and interested persons such process as is required.

11.0 REVOCATION OR SUSPENSION OF PERMIT

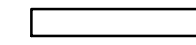
The Commission may initiate action to revoke or suspend this permit at any time. The Commission shall act in accordance with the requirements of Minn. R. 7850.5100, to revoke or suspend the permit.

FIGURE 1.1 Proposed Route Overview

LEGEND

-  Odell Wind Farm Substation
-  Woad Hill Substation Area
-  Proposed Route
-  Private Airstrips
-  Existing HVTL
-  Pipeline - Field Verified
-  US Highway
-  State Highway
-  County Highway
-  County Road
-  Other Roads
-  County Boundary

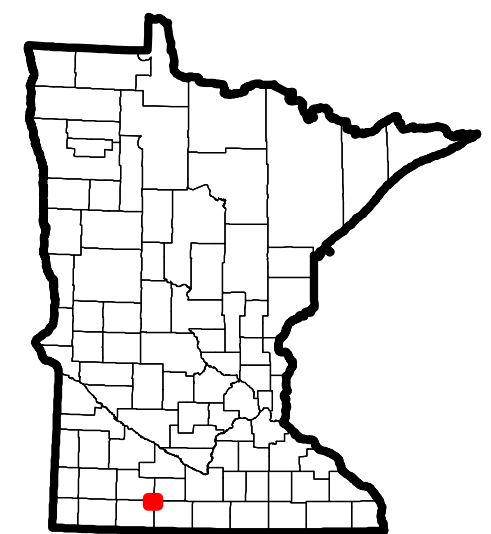
0.5



Miles



NAD 1983 UTM Zone 15N



SOURCES:
Geronimo Energy,
Ventyx, USGS,
MNDNR

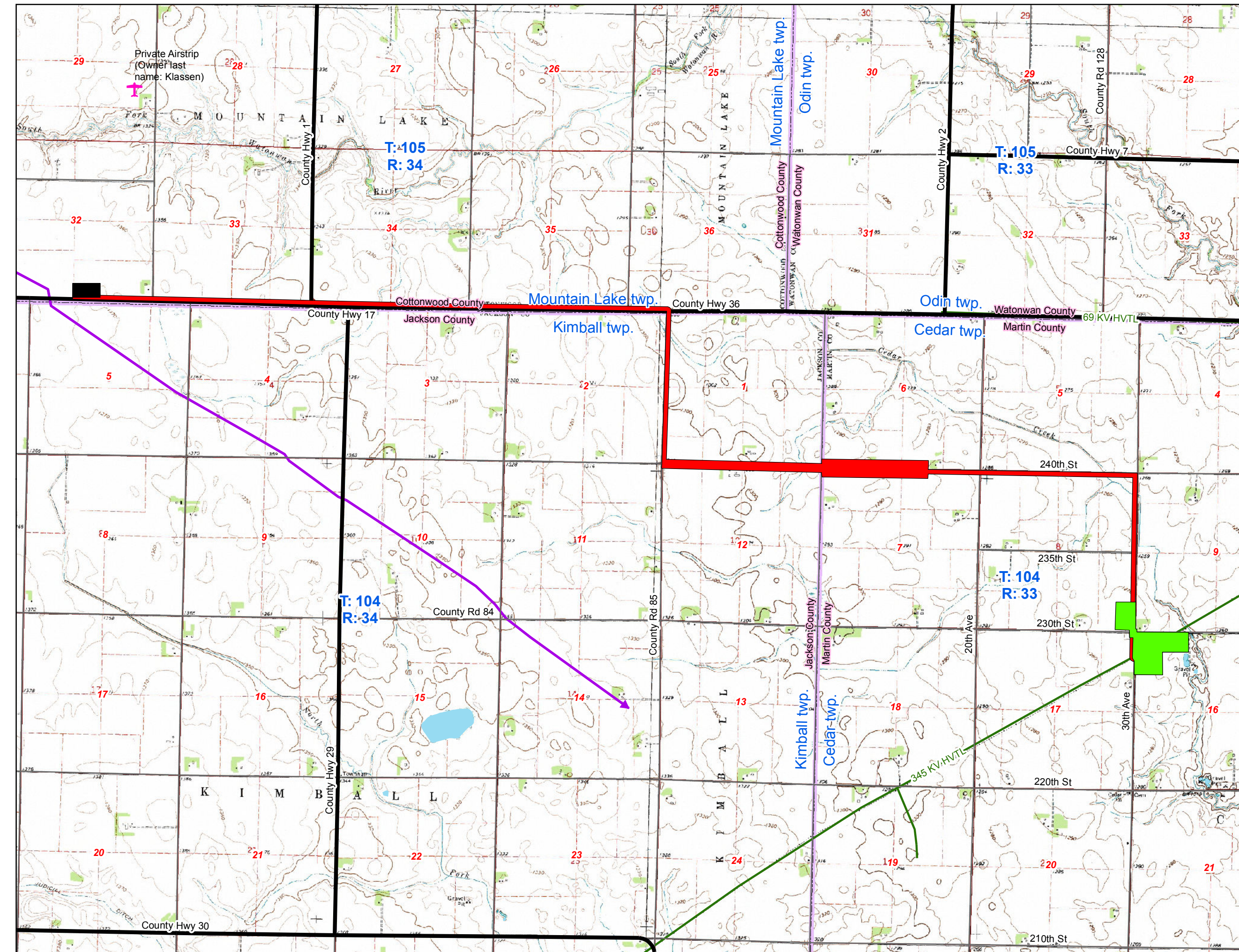


FIGURE 5.2 (a)
Locations of
Residences or
Farmsteads

LEGEND

- Residence/Farmstead
- Anticipated Alignment
- Woad Hill Substation
- Proposed Route
- Odell Wind Farm Substation

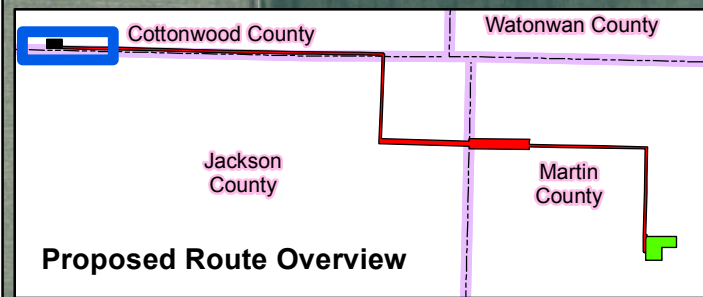
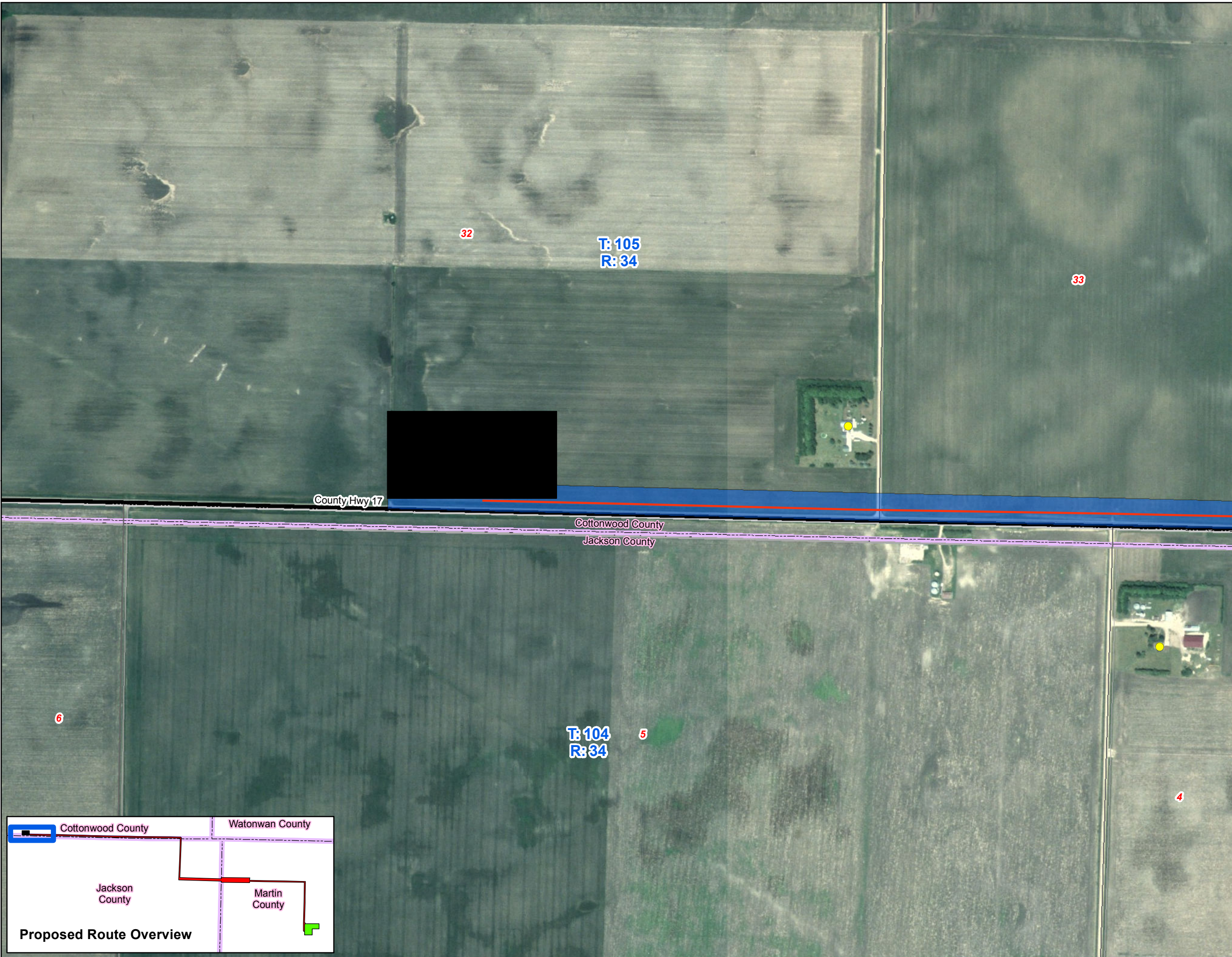
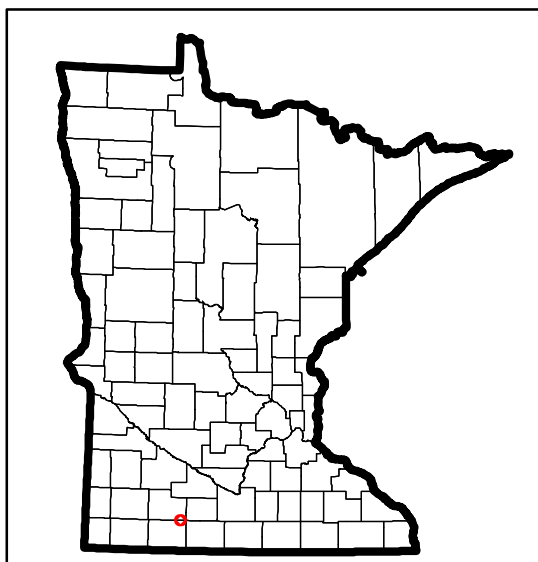
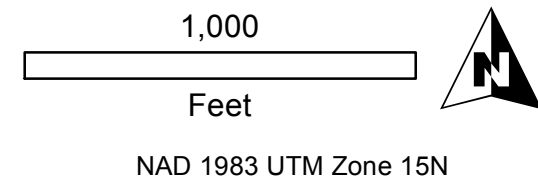







FIGURE 5.2 (b)
Locations of
Residences or
Farmsteads

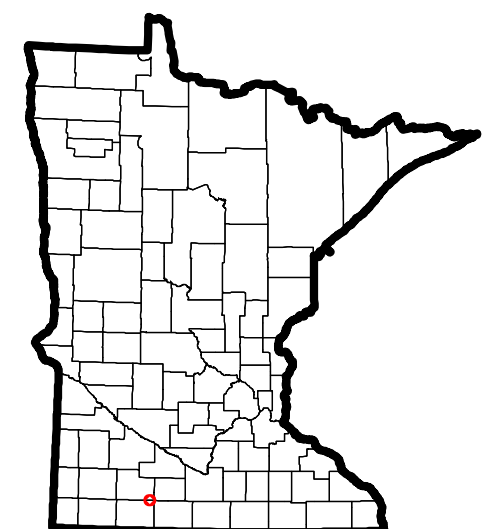
LEGEND

-  Residence/Farmstead
-  Anticipated Alignment
-  Woad Hill Substation
-  Proposed Route
-  Odell Wind Farm Substation

1,000

Feet

NAD 1983 UTM Zone 15N



SOURCES:
Geronimo Energy,
Ventyx, NAIP,
WSB, PWI

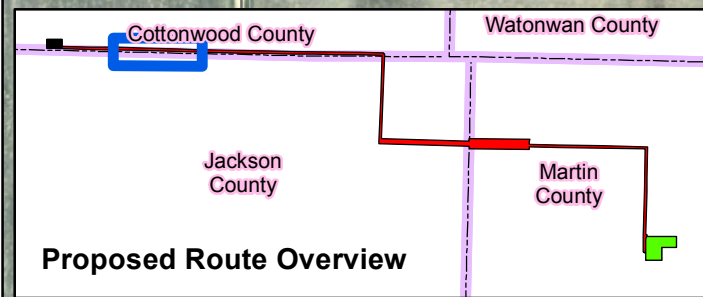







FIGURE 5.2 (c)
Locations of
Residences or
Farmsteads

LEGEND

-  Residence/Farmstead
-  Anticipated Alignment
-  Woad Hill Substation
-  Proposed Route
-  Odell Wind Farm Substation

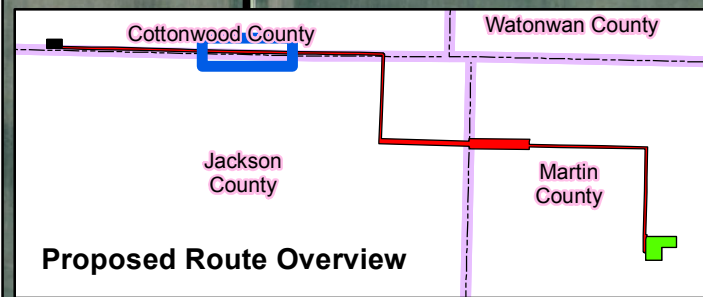
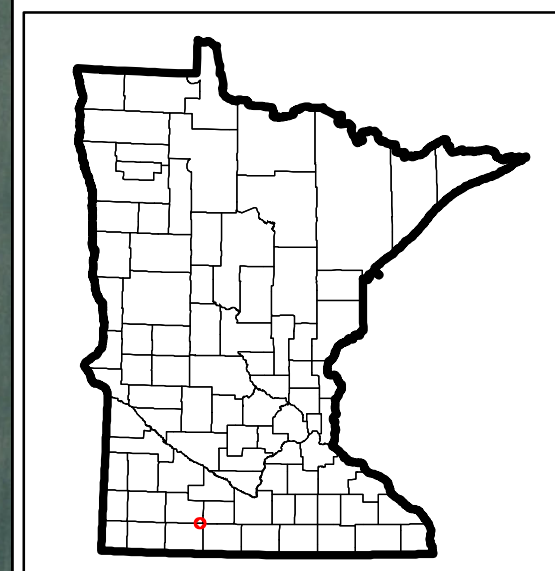
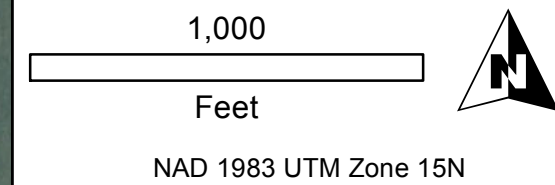
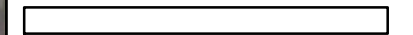


FIGURE 5.2 (d)
Locations of
Residences or
Farmsteads

LEGEND

- Residence/Farmstead
- Anticipated Alignment
- Woad Hill Substation
- Proposed Route
- Odell Wind Farm Substation

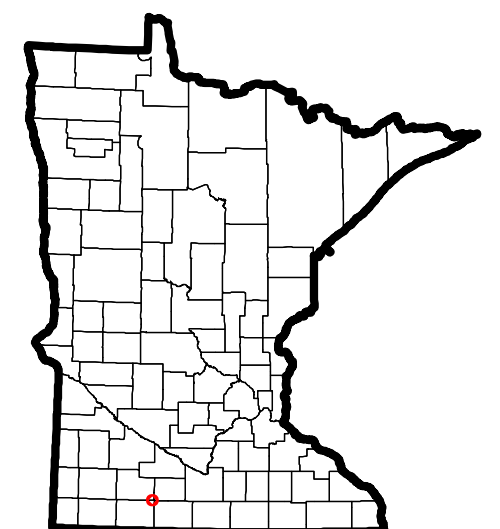
1,000



Feet



NAD 1983 UTM Zone 15N



SOURCES:
Geronimo Energy,
Ventyx, NAIP,
WSB, PWI

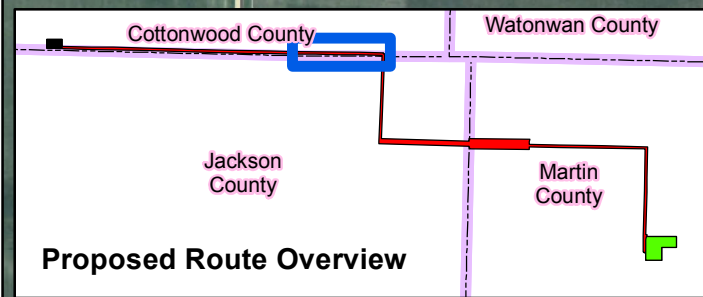


FIGURE 5.2 (e)
Locations of
Residences or
Farmsteads

LEGEND

- Residence/Farmstead
- Anticipated Alignment
- Woad Hill Substation
- Proposed Route
- Odell Wind Farm Substation

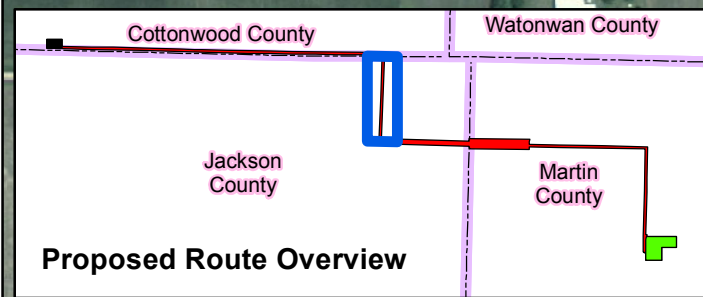
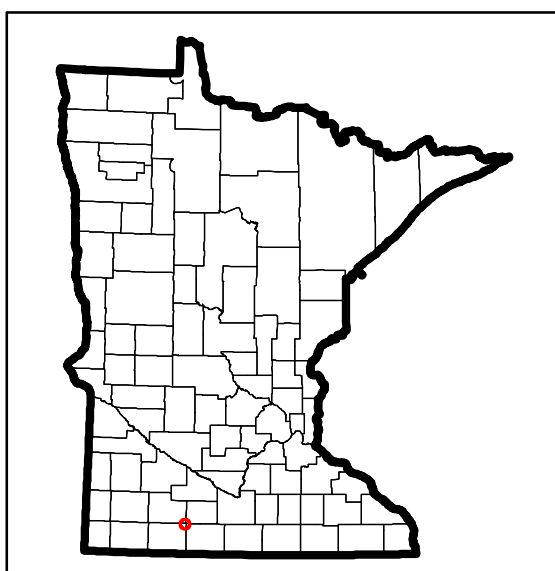
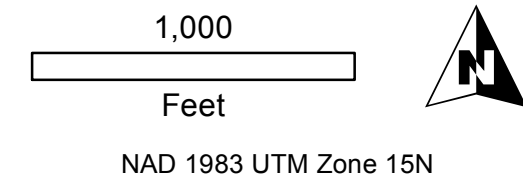







FIGURE 5.2 (f)
Locations of
Residences or
Farmsteads

LEGEND

-  Residence/Farmstead
-  Anticipated Alignment
-  Woad Hill Substation
-  Proposed Route
-  Odell Wind Farm Substation

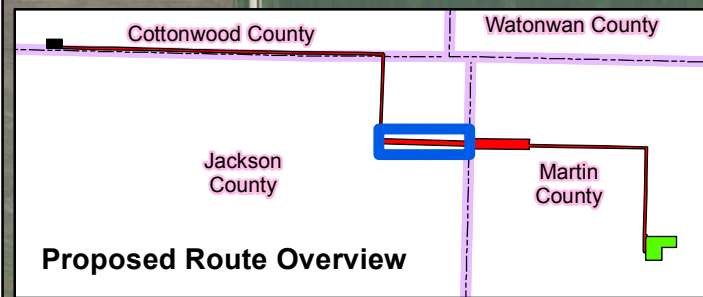
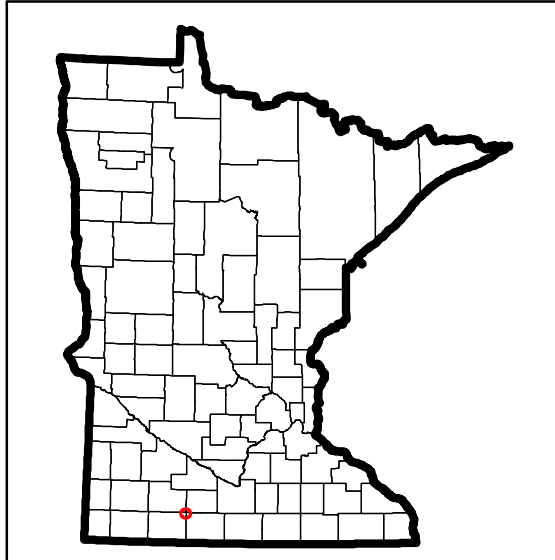
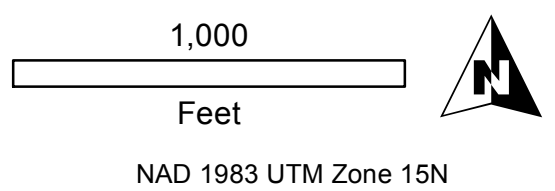





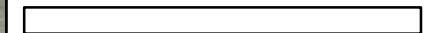


FIGURE 5.2 (g)
Locations of
Residences or
Farmsteads

LEGEND

-  Residence/Farmstead
-  Anticipated Alignment
-  Woad Hill Substation
-  Proposed Route
-  Odell Wind Farm Substation

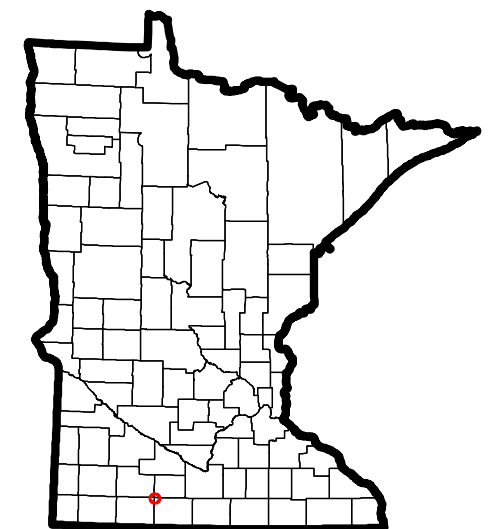
1,000



Feet



NAD 1983 UTM Zone 15N



SOURCES:
Geronimo Energy,
Ventyx, NAIP,
WSB, PWI

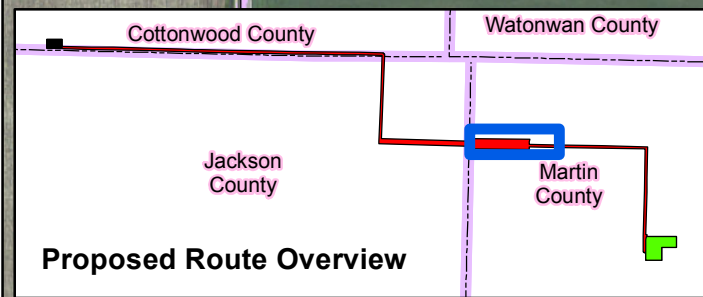
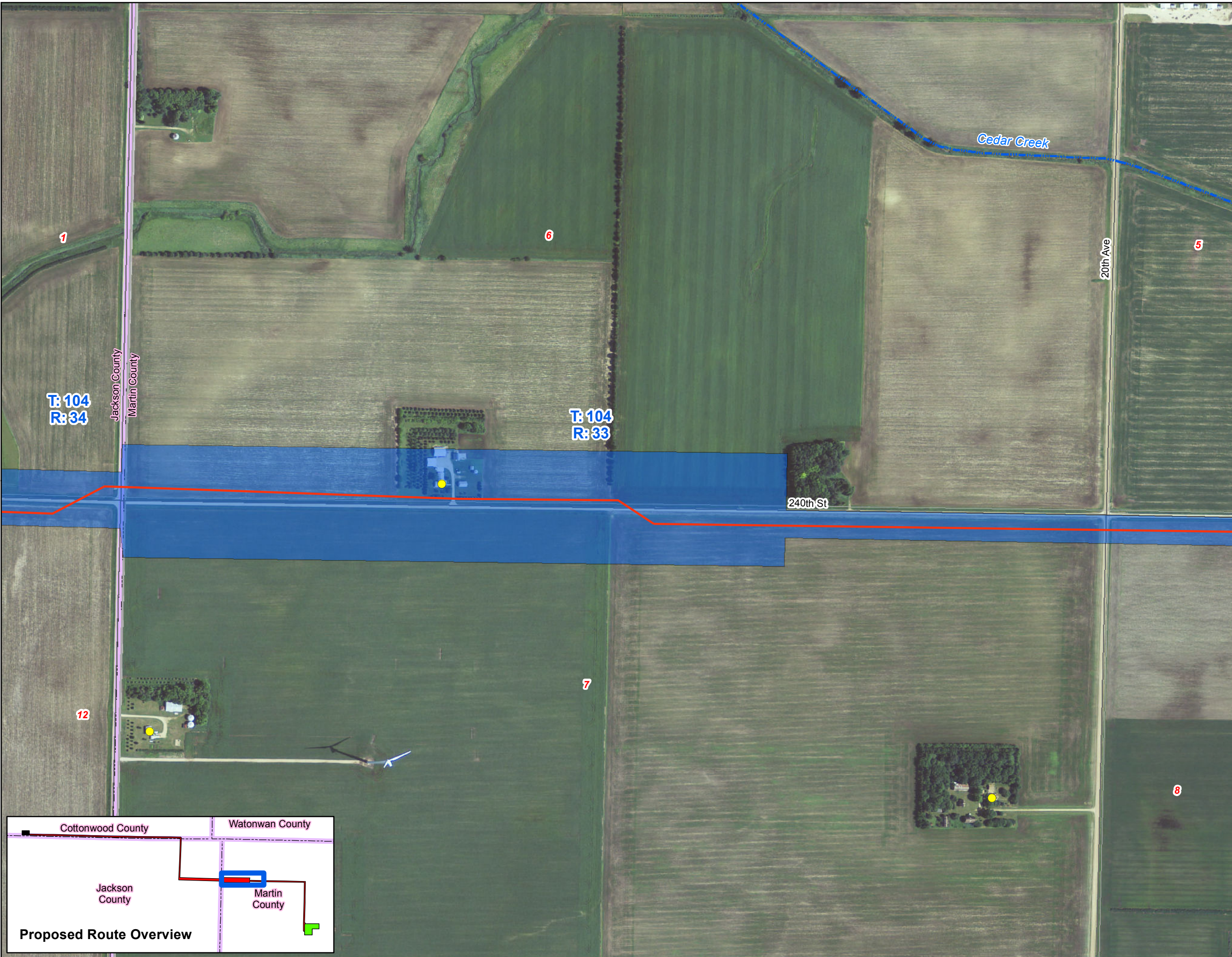





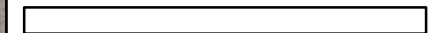


FIGURE 5.2 (h)
Locations of
Residences or
Farmsteads

LEGEND

-  Residence/Farmstead
-  Anticipated Alignment
-  Woad Hill Substation
-  Proposed Route
-  Odell Wind Farm Substation

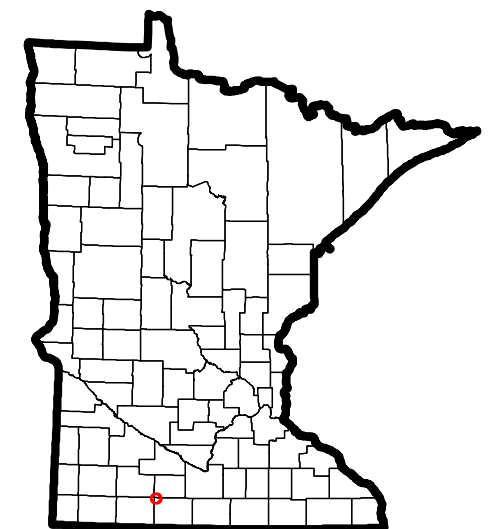
1,000



Feet



NAD 1983 UTM Zone 15N



SOURCES:
Geronimo Energy,
Ventyx, NAIP,
WSB, PWI

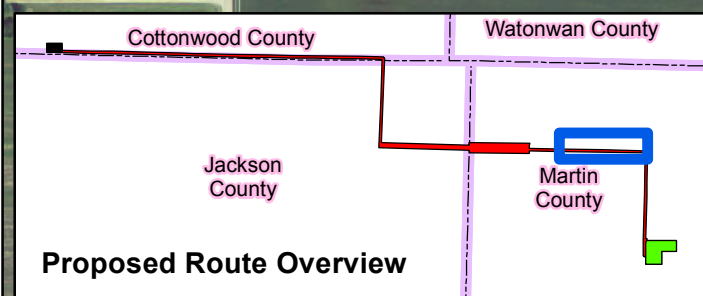
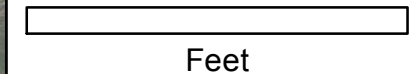


FIGURE 5.2 (i)
Locations of
Residences or
Farmsteads

LEGEND

- Residence/Farmstead
- Anticipated Alignment
- Woad Hill Substation Area
- Proposed Route
- Odell Wind Farm Substation

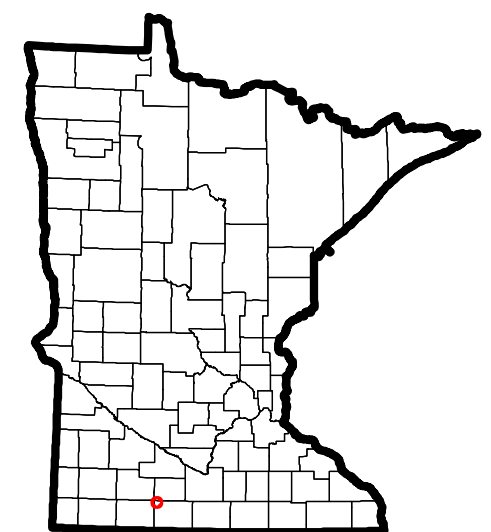
1,250



Feet



NAD 1983 UTM Zone 15N



SOURCES:
Geronimo Energy,
Ventyx, NAIP,
WSB, PWI

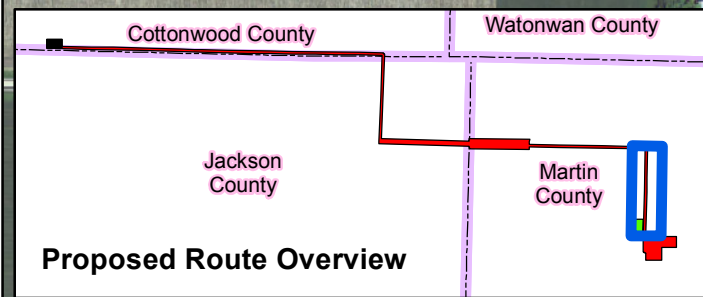
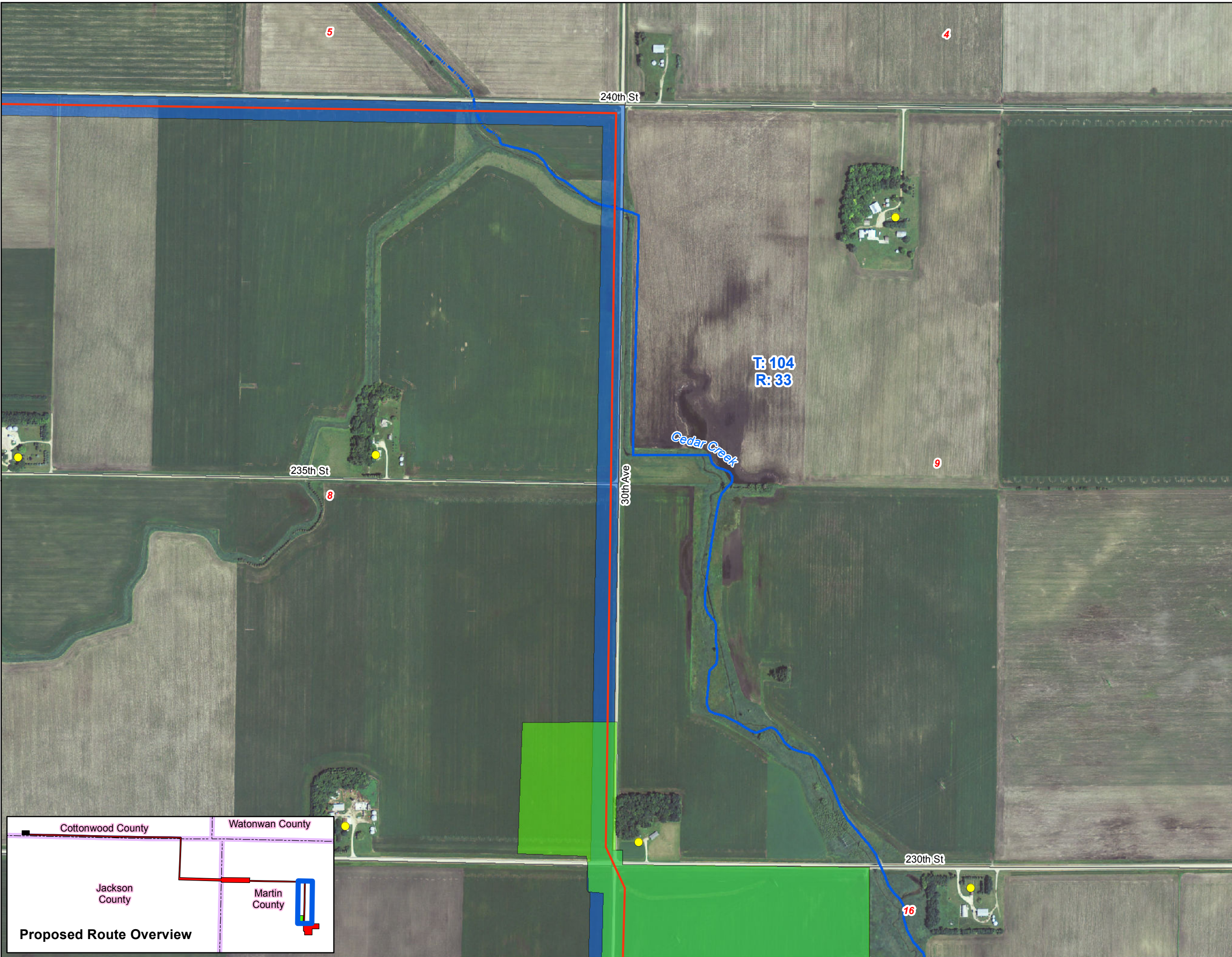





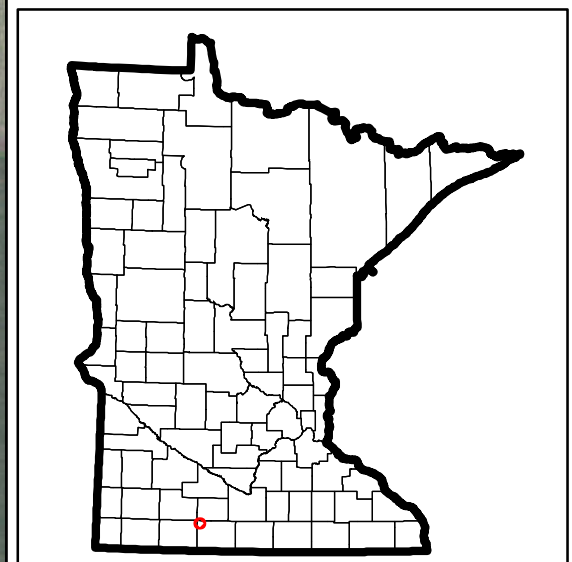
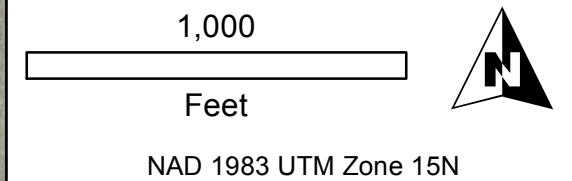


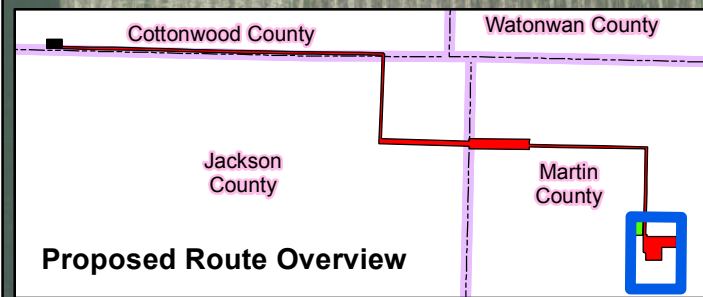
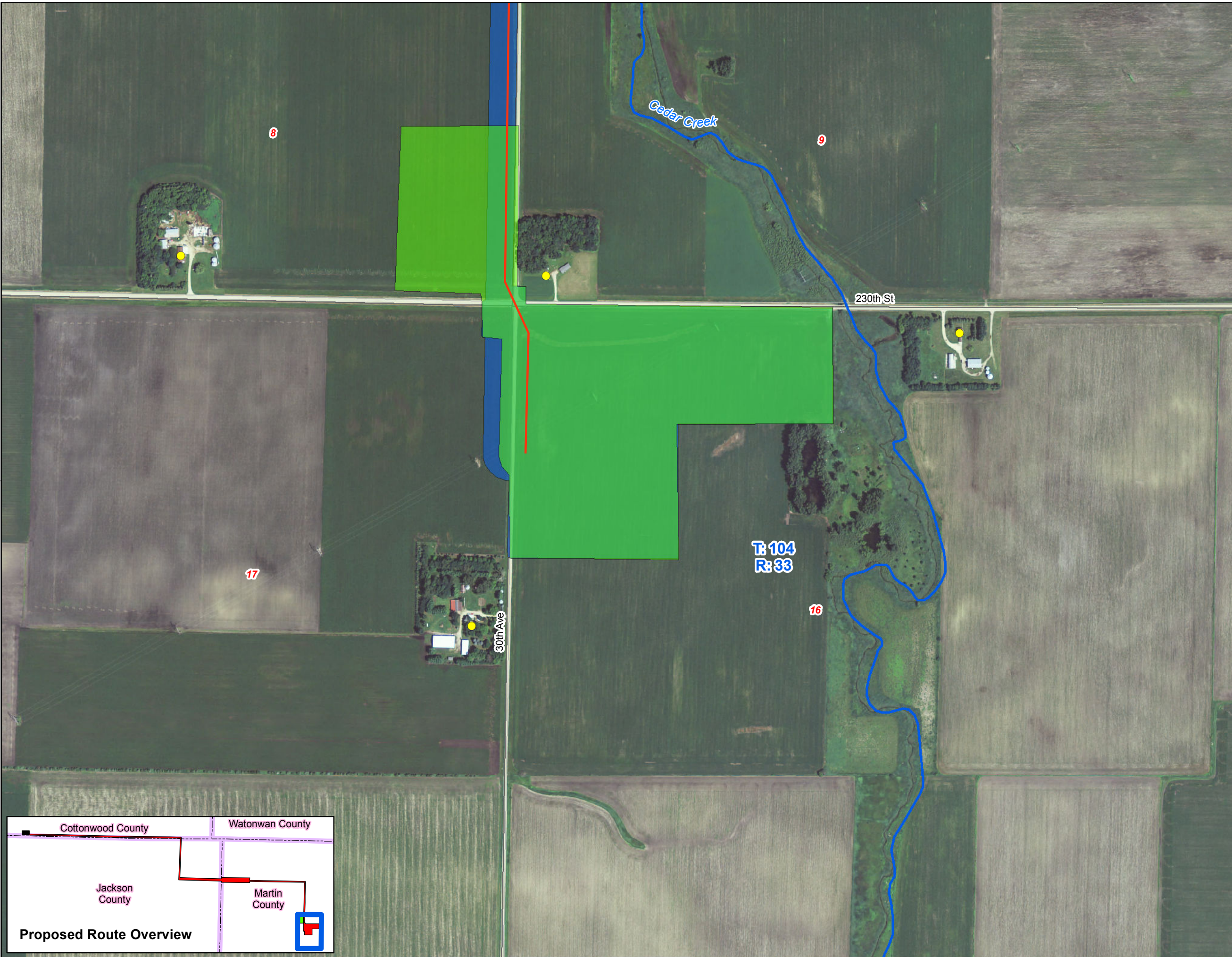
FIGURE 5.2 (j)
Locations of
Residences or
Farmsteads

LEGEND

-  Residence/Farmstead
-  Anticipated Alignment
-  Woad Hill Substation Area
-  Proposed Route
-  Odell Wind Farm Substation



SOURCES:
Geronimo Energy,
Ventyx, NAIP,
WSB, PWI



**MINNESOTA PUBLIC UTILITIES COMMISSION
COMPLAINT HANDLING PROCEDURES FOR
HIGH-VOLTAGE TRANSMISSION LINES**

A. Purpose

To establish a uniform and timely method of reporting complaints received by the permittee concerning permit conditions for site preparation, construction, cleanup and restoration, operation, and resolution of such complaints.

B. Scope

This document describes complaint reporting procedures and frequency.

C. Applicability

The procedures shall be used for all complaints received by the permittee and all complaints received by the Minnesota Public Utilities Commission (Commission) under Minn. R. 7829.1500 or Minn. R. 7829.1700 relevant to this permit.

D. Definitions

Complaint: A verbal or written statement presented to the permittees by a person expressing dissatisfaction or concern regarding site preparation, cleanup or restoration or other route and associated facilities permit conditions. Complaints do not include requests, inquiries, questions or general comments.

Substantial Complaint: A written complaint alleging a violation of a specific permit condition that, if substantiated, could result in permit modification or suspension pursuant to the applicable regulations.

Unresolved Complaint: A complaint which, despite the good faith efforts of the permittee and a person, remains to both or one of the parties unresolved or unsatisfactorily resolved.

Person: An individual, partnership, joint venture, private or public corporation, association, firm, public service company, cooperative, political subdivision, municipal corporation, government agency, public utility district, or any other entity, public or private, however organized.

E. Complaint Documentation and Processing

1. The permittee shall designate an individual to summarize complaints for the Commission. This person's name, phone number and email address shall accompany all complaint submittals.
2. A person presenting the complaint should to the extent possible, include the following information in their communications:
 - a. name, address, phone number, and email address;
 - b. date of complaint;
 - c. tract or parcel number; and
 - d. whether the complaint relates to a permit matter or a compliance issue.
3. The permittee shall document all complaints by maintaining a record of all applicable information concerning the complaint, including the following:
 - a. docket number and project name;
 - b. name of complainant, address, phone number and email address;
 - c. precise description of property or parcel number;
 - d. name of permittee representative receiving complaint and date of receipt;
 - e. nature of complaint and the applicable permit condition(s);
 - f. activities undertaken to resolve the complaint; and
 - g. final disposition of the complaint.

F. Reporting Requirements

The permittee shall commence complaint reporting at the beginning of project construction and continue through the term of the permit. The permittee shall report all complaints to the Commission according to the following schedule:

Immediate Reports: All substantial complaints shall be reported to the Commission the same day received, or on the following working day for complaints received after working hours. Such reports are to be directed to the Commission's Consumer Affairs Office at 1-800-657-3782 (voice messages are acceptable) or consumer.puc@state.mn.us. For e-mail reporting, the email subject line should read "PUC EFP Complaint" and include the appropriate project docket number.

Monthly Reports: By the 15th of each month, a summary of all complaints, including substantial complaints received or resolved during the preceding month, shall be filed to Dr. Burl W. Haar, Executive Secretary, Public Utilities Commission, using the eDockets system. The eDockets system is located at: <https://www.edockets.state.mn.us/EFiling/home.jsp>

If no complaints were received during the preceding month, the permittee shall file a summary indicating that no complaints were received.

G. Complaints Received by the Commission

Complaints received directly by the Commission from aggrieved persons regarding site preparation, construction, cleanup, restoration, operation and maintenance shall be promptly sent to the permittee.

H. Commission Process for Unresolved Complaints

Commission staff shall perform an initial evaluation of unresolved complaints submitted to the Commission. Complaints raising substantial permit issues shall be processed and resolved by the Commission. Staff shall notify the permittee and appropriate persons if it determines that the complaint is a substantial complaint. With respect to such complaints, each party shall submit a written summary of its position to the Commission no later than ten (10) days after receipt of the staff notification. The complaint will be presented to the Commission for a decision as soon as practicable.

I. Permittee Contacts for Complaints and Complaint Reporting

Complaints may be filed by mail or email to:

Patrick Smith
Odell Wind Farm, LLC
7650 Edinborough Way, Suite 725
Edina, MN 55435
952-988-9000
Patrick@geronimoenergy.com

This information shall be maintained current by informing the Commission of any changes by eFiling, as they become effective.

**MINNESOTA PUBLIC UTILITIES COMMISSION
COMPLIANCE FILING PROCEDURE FOR
PERMITTED ENERGY FACILITIES**

A. Purpose

To establish a uniform and timely method of submitting information required by the Commission energy facility permits.

B. Scope and Applicability

This procedure encompasses all compliance filings required by permit.

C. Definitions

Compliance Filing: A filing of information to the Commission, where the information is required by a Commission site or route permit.

D. Responsibilities

1. The permittee shall eFile all compliance filings with Dr. Burl W. Haar, Executive Secretary, Public Utilities Commission, through the eDockets system. The eDockets system is located at: <https://www.edockets.state.mn.us/EFiling/home.jsp>

General instructions are provided on the eDockets website. Permittees must register on the website to eFile documents.

2. All filings must have a cover sheet that includes:
 - a. Date
 - b. Name of submitter/permittee
 - c. Type of permit (site or route)
 - d. Project location
 - e. Project docket number
 - f. Permit section under which the filing is made
 - g. Short description of the filing

3. Filings that are graphic intensive (e.g., maps, engineered drawings) must, in addition to being eFiled, be submitted as paper copies and on CD. Paper copies and CDs should be sent to: 1) Dr. Burl W. Haar, Executive Secretary, Minnesota Public Utilities Commission, 121 7th Place East, Suite 350, St. Paul, MN 55101-2147, and 2) Department of Commerce, Energy Environmental Review and Analysis, 85 7th Place East, Suite 500, St. Paul, MN 55101-2198.

The Commission may request a paper copy of any eFiled document.

PERMIT COMPLIANCE FILINGS¹

PERMITTEE:

PERMIT TYPE:

PROJECT LOCATION:

PUC DOCKET NUMBER:

Filing Number	Permit Section	Description of Filing	Due Date
	8.1	Plan and profile of right-of-way	30 days before right-of-way preparation for construction
	4.2.1	Contact information for field representative	14 days prior to construction
	4.2.14	Restoration complete	60 days after completion of all restoration activities
	8.2	Periodic status reports	Monthly
	7.0	Complaint procedures	Prior to construction
	Attachment B	Complaint reports	By the 15 th of each month
	4.1	Notification to landowners	First contact with landowners after permit issuance
	8.3.1	Notice of completion and date of placement in service	Three days prior to energizing
	8.3.2	Provide as-built plans and specifications	Within 60 days after completion of construction
	8.3.3	Provide GPS data	Within 60 days after completion of construction
	4.2.12	Notification of previously unrecorded archaeological sites	Upon discovery

¹ This compilation of permit compliance filings is provided for the convenience of the permittee and the Commission. It is not a substitute for the permit; the language of the permit controls.