



Energy Environmental Review and Analysis
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November 7, 2014

Burl W. Haar, Executive Secretary
Minnesota Public Utilities Commission
127 7th Place East, Suite 350
St. Paul, MN 55101-2147

**Re: Great River Energy Application for Minor
Alteration of the Savanna 115 kV Transmission Line
Docket No. ET2, E015/TL-10-1307**

Dear Dr. Haar:

Attached are the review and comments of the Minnesota Department of Commerce Energy Environmental Review and Analysis (EERA) staff in the below matter:

In the Matter of Great River Energy's Application for a Minor Alteration to the Savanna 115 kV Transmission Line in St. Louis and Carlton Counties

Great River Energy has submitted an application pursuant to Minnesota Rule 7850.4800 for approval of a minor alteration to make a modification to the approved route east of Structures 27 through 30 to address a stakeholder/landowner concern.

This filing was made on September 24, 2014, by:

Carole L. Schmidt
Supervisor, Transmission Permitting and Compliance
12300 Elm Creek Blvd.
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EERA staff is available to answer any questions the Commission may have.

Sincerely,

William Cole Storm, EERA Staff

DOC – EERA Comments & Recommendations
GRE Request for a Minor Alteration
Savanna 115 kV Transmission Line
ET2, E015/TL-10-1307

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BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

**COMMENTS AND RECOMMENDATIONS OF
MINNESOTA DEPARTMENT OF COMMERCE
ENERGY ENVIRONMENTAL REVIEW AND ANALYSIS**

DOCKET NO. ET2, E015/TL-10-1307

Date: November 7, 2014

EERA Staff: William Cole Storm651-539-1844

In the Matter of Great River Energy's Application for a Minor Alteration to the Savanna 115 kV Transmission Line in St. Louis and Carlton Counties

Issue(s) Addressed: These comments address the definition of a minor alteration and whether the requested modifications are minor.

Additional documents and information can be found on
<http://mn.gov/commerce/energyfacilities/Docket.html?Id=31883> or on eDockets
<https://www.edockets.state.mn.us/EFiling/search.jsp> (Year "10" and Number "1307")

This document can be made available in alternative formats; i.e. large print or audio tape by calling (651) 539-1530.

INTRODUCTION AND BACKGROUND

Great River Energy (GRE) filed an application¹ with the Public Utilities Commission (Commission) for a minor alteration on September 24, 2014 to modify the approved route east of Structures 27 through 30 along the proposed Savanna 115 kV transmission line.

GRE states the modification is needed to accommodate a stakeholder/landowner request to relocate the transmission line behind some buildings of concern in the area. The identified area

¹ "Minor Alteration Request" (Application), Great River Energy, [20149-103277-01](#), September 24, 2014

that would need to be outside the permitted route involves Structures 27A, 28, 28A, 29, and 29A as illustrated in GRE’s submittal.

REGULATORY PROCESS AND PROCEDURE

GRE has filed a Minor Alteration request under Minnesota Rule 7850.4800, subp. 2. The rule states:

The application shall be in writing and shall describe the alteration in the large electric power generating plant or high voltage transmission line to be made and the explanation why the alteration is minor.

In subp. 1, the same rule states:

A minor alteration is a change in a large electric power generating plant or high voltage transmission line that does not result in significant changes in the human or environmental impact of the facility.

Subpart 3 explains the Commission's role in the proceeding is to determine whether or not the requested changes are minor, whether or not to authorize the alteration and whether or not to apply reasonable conditions on the action. The Commission may also determine the alteration is not minor and needs to be considered under the full permitting process.

EERA ANALYSIS AND COMMENTS

EERA staff has reviewed GRE's minor alteration application. Based on this record, EERA staff believes that the proposed modification to the project would not result in significant changes in the human or environmental impacts to the area over those anticipated with the permitted route and is eligible for authorization as a minor alteration.

Minor Alteration

Minnesota Rule 7850.4800 provides a rather succinct standard for evaluating minor alteration applications – whether the proposed project will result in significant changes in the human and environment impacts of the existing facility. To flesh out this standard, EERA staff uses the routing factors of Minn. Rule 7850.4100. These are the issues considered by the Commission when it permitted this high voltage transmission line. These factors provide appropriate detail for evaluating the significance of potential human and environmental impacts. For example, Minn. Rule 7850.4100 subp. A notes that an evaluation of impacts to human settlements should include impacts related to displacement, noise, aesthetics, cultural values, recreation, and public services.²

² Minnesota Rule 7850.4100, <https://www.revisor.mn.gov/rules/?id=7850.4100>

The Application contains tables summarizing the requests, comparing the human and environmental impacts between the proposed modification and the permitted route and assessing the impacts based on analysis of the factors in Minn. Rule 7850.4100. These data and analysis provide EERA and, eventually the Commission, with the information necessary to evaluate if the modifications requested result in significant changes to the impacts of the facility.

Factors to Consider

EERA staff believes that for most all of the factors in Minn. Rule 7850.4100, the anticipated impacts of GRE’s proposed project modification will be similar or lessened compared to the permitted route. These factors, and elements thereof, address impacts related to:

- Human settlements (displacement, noise, cultural values, recreation, public services). The modified route would result in a decrease in the number of residences within 150 feet of the transmission line and decrease the number of parcels crossed.
- Public health and safety.
- Land-based economies (forestry, tourism, and mining).
- Archaeological and historic resources.
- Natural environment (air quality, flora, fauna, wetlands).
- Rare and unique natural resources.
- Electrical system reliability.

EERA staff understands that there are factors in Minn. Rule 7850.4100 for which the requested modification may result in a slight increase in the potential impacts anticipated with the permitted route. These differences are not believed to be significant. Those criteria are:

- Land-based economies (agriculture). The modified route would result in an estimated additional loss of 0.94 acres of crop/grass land.
- Natural environment (flora). The modified route would result in an estimated additional loss of 0.17 acres of upland deciduous forest.
- Use or paralleling or existing rights-of-way, survey lines, natural division lines, and agricultural field boundaries. The modified transmission line, once installed, will not continue to parallel close to the existing right-of-way; however, it will be sited along property lines where practical.
- Use of existing transportation, pipeline, and electrical transmission systems or rights-of-way. The modified route would cause the loss of the opportunity to utilize the existing 69kV right-of-way (i.e., rebuild), resulting in approximately 924 feet of new right-of-way.

GRE has indicated that it has met with landowners and that they concur with the route modification as proposed. This concurrence may be considered an indication of how landowners perceive the significance of the incremental impacts of the modified route and its benefits. Landowners have received copies of this application and notice period.

EERA CONCLUSIONS AND RECOMMENDATION

EERA concludes the requested alterations do not significantly change the human or environmental impact of the project and are, therefore, minor.

EERA recommends the Commission approve GRE's request to modify the permitted route for the Savanna 115 kV transmission line as proposed.

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Review and Comments**

Docket No. ET2, E015/TL-10-1307

Dated this 7th day of November 2014

/s/Sharon Ferguson

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