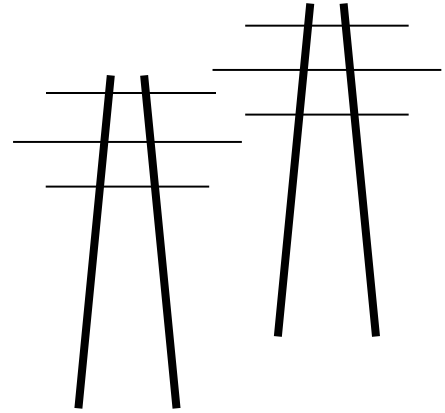


## Legalelectric, Inc.

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April 21, 2024

Will Seuffert  
Executive Secretary  
Public Utilities Commission  
121 – 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101

via eDockets & consumer.puc@state.mn.us

RE: Comment on “Topics for Comment” including Completeness, etc.  
The Prehn Family & NoCapX 2020  
Wilmarth-N Rochester-Tremval or Mankato-Mississippi Transmission Line  
PUC Dockets ECN-22-532 and TL-23-157

Dear Mr. Seuffert:

I’m filing these comments on behalf of the Prehn Family, who live along Segment 1, and on behalf of NoCapX 2020, an intervenor with local grassroots groups in three of the CapX 2020 dockets, including some areas which are again targeted with transmission.

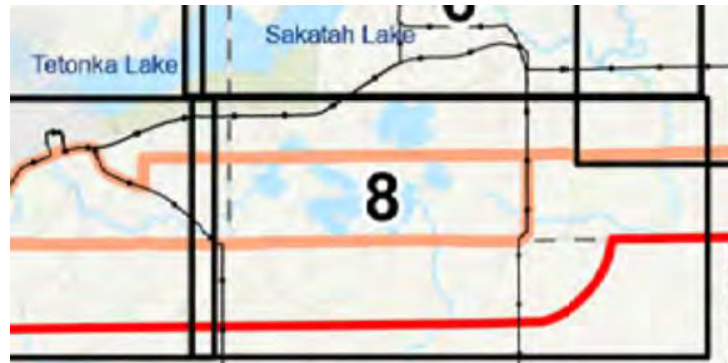
The Commission identified multiple areas open for comments, including BUT NOT LIMITED TO, “completeness.” Those topics are:

- Does the joint certificate of need and route permit application contain the information required under Minn. R. 7849.0220, subp. 2, and Minn. R. 7850.3100?
- Should the certificate of need be evaluated using the Commission’s informal process or referred to the Office of Administrative Hearings for a contested case hearing?
- Should the certificate of need and route permit proceedings be combined (*i.e.*, joint public information meetings, joint environmental review, and joint public hearings)?
- Are there any contested issues of fact with respect to the representations made in the application?
- Should an advisory task force be appointed?
- Should the Commission direct the Executive Secretary to issue an authorization to the applicant to initiate consultation with the Minnesota State Historic Preservation Office (SHPO)?
- Are there other issues or concerns related to this matter?

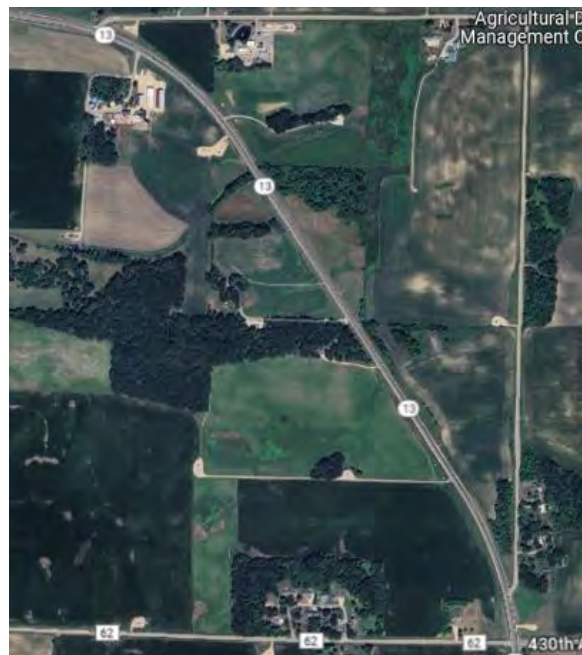
Point by point, issue by issue, beginning with **COMPLETENESS**:

**Missing from the application: A portion of “Segment 1” is proposed right over a massive natural gas storage dome and associated wells and pipelines**

There is no mention of the massive underground storage facility under 13+ square miles centered on Hwy 13 just south of Waterville, north of Waseca. **The application is incomplete because it must include identification of the portion of the proposed route and alignment that traverses a DNR permitted natural gas storage dome** in the area depicted on the Map 8 of Segment 1. Two natural gas pipelines in Segment 1 are deceptively referred to as “hydrocarbon” pipelines. P. 201. This area in Segment 1, Map 8, must be removed from consideration of the transmission route:



The Prehn family home and acreage has been in the family for over a century. It sits directly on top of the dome, across Highway 13 from the (now) CenterPoint pumping station and water treatment center. Their address is **43497 East Hwy. 13, Waseca, Minnesota 56093**, on Hwy. 13 between 430<sup>th</sup> and 440<sup>th</sup>. From the top of the map, their home is in the center between these east/west roads. Their driveway is in the woods between the 2nd and 3rd “13” on aerial map below, and a second access is seen across the north end of the field just south of their woods. **The Prehn home is not identified on Map 8 of Segment 1.**



The application is incomplete because it does not identify all homesteads and other buildings within at least one-half mile of the route, and “adjacent” must be sufficiently defined. Below is the section of Map 8 in Segment 1, and homes are missing:



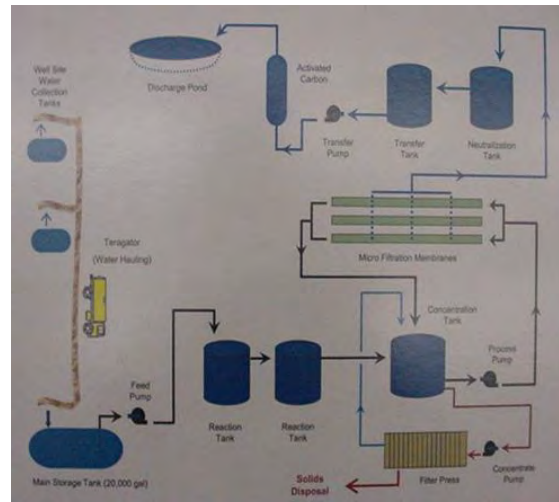
This photo is looking slightly northeast from the Prehn’s homestead across Hwy.13 over to the CenterPoint pumping and water treatment site on left edge. This is the gas pumping station for the at least 7 billion cubic foot underground gas storage facility. When it was opened, wells were added to pump out unwanted water from the gas and dumped on adjacent fields. After Nancy Prehn registered a complaint, an EAW was performed. Then collector tanks were installed and a water treatment facility built at the pumping station. Gators pull the water out of the tanks and transport it to the water treatment facility.



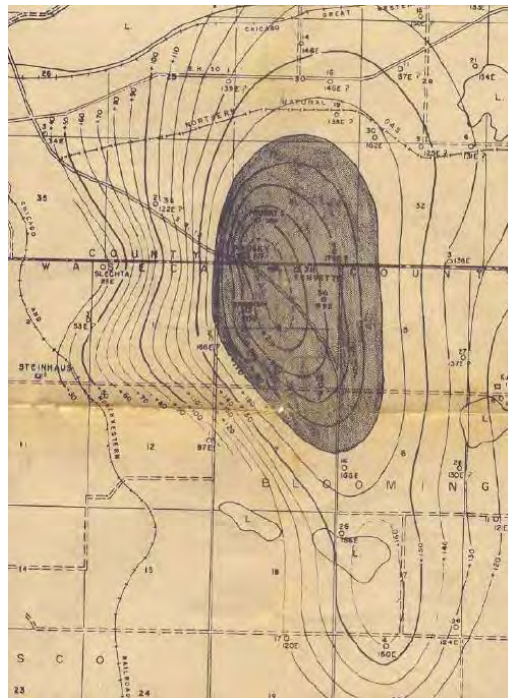
These are examples of the wells and the small buildings covering them and other equipment. The landscape above the 10+ square mile, 7 billion cubic foot natural gas storage dome is dotted with them. Removing the water is a noise process, particularly in winter. A drive through the area is eerie, because it’s impossible to forget all that gas stored below. As Nancy Prehn often says at random moments, “BOOM!” **The application must show each of these many wells on the maps and address impacts.**



This omission is major – it is the only natural gas dome in Minnesota. CenterPoint’s facilities are a primary focus of this area. Below is the water treatment facility and the process for treating the contaminated water that has been removed from gas processes.

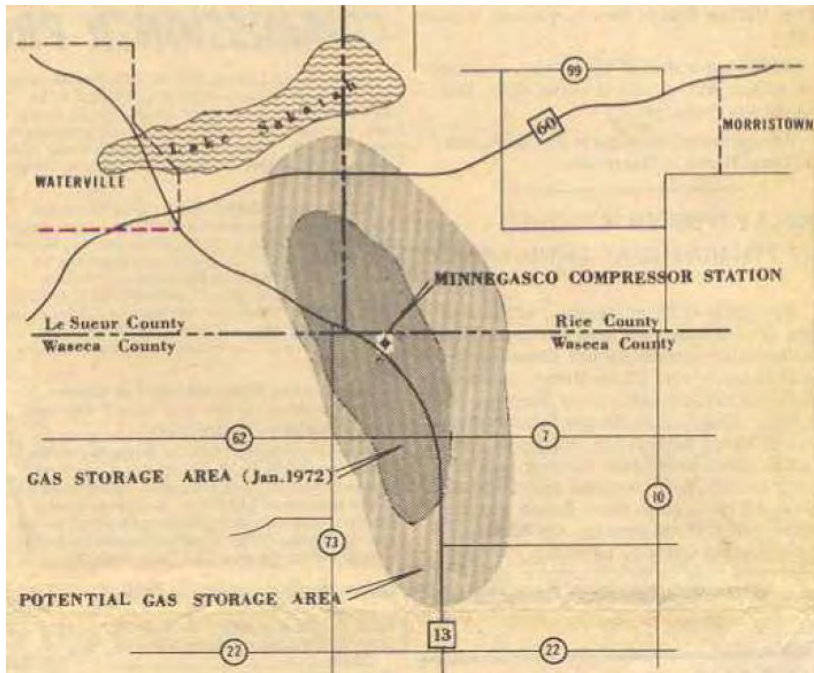


The application should document the gas dome’s current footprint. In the 1960s, was smaller than it is now -- you can see State Hwy 60 on the north, and State Hwy. 13 heading southward:

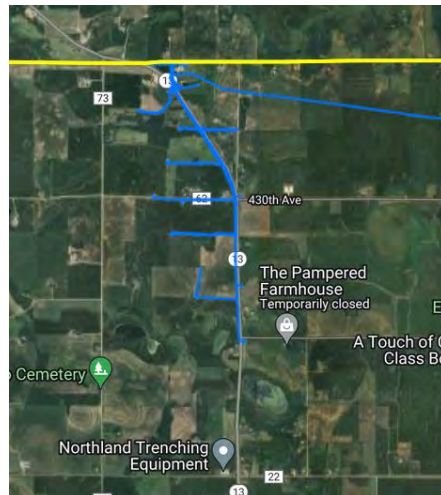


In 1972, the area was enlarged, and at the time, expansion of capacity to 20 billion cubic feet was planned. Attachment A, Minnegasco reports satisfactory operations in Waterville area. An update on capacity and area of dome will need to be obtained from the DNR, which holds the permit for the underground storage facility. In 1972, the storage was reported to be situated beneath 8,400 acres of farmland, over 13 square miles. Attachment B, Residents fume over more gas storage. Permission to drill in Lake Sakatah was granted to determine the extent of the dome. Attachment C, Gas company will drill well in Sakatah State Park. It is unknown to us the results of drilling and if natural gas is stored under the park. **The application must include**

current information on gas capacity and the physical boundaries of the natural gas dome.



From the County's gas maps online<sup>1</sup>, these are the natural gas pipelines in the area. There's a pipeline along 13, and from that, there are extensions to the east and west at the northernmost Prehn property line, with wells on each end, and there's another with two wells from Hwy. 13 to the west at the southern property boundary. **The application is incomplete because it does not show all gas pipelines in the area.**



**The application is incomplete because it does not address the documented high potential for corrosive impact of transmission lines on pipelines<sup>2</sup>.**

<sup>1</sup> Online at: <https://pvnpm.phmsa.dot.gov/PublicViewer/>

<sup>2</sup> See e.g., "Effects of electromagnetic interference and crevice on corrosion of natural gas pipelines," <https://iopscience.iop.org/article/10.1088/1755-1315/675/1/012061/pdf>

**The application is incomplete because it does not document and consider cumulative impacts of the Wilmarth-North Rochester-Tremval (Mankato-Mississippi) transmission project on top of CapX 2020.**

Many in the path of this proposed transmission projects are people who were already paying the price of CapX 2020 proposed for or routed on their property and who are very upset at the prospect of having more land taken for this project. I have heard from two client families in this project's path who have faced utility infrastructure projects previously.

**The application is incomplete because it does not document and consider cumulative impacts of the multiple transmission projects currently before the Commission.**

**The application is incomplete because it does not address the cumulative impacts of the threat of having another transmission line on property that already has one transmission threat and or a transmission easement, and the cumulative impacts of other utility infrastructure, i.e., pipeline, wells, and gas dome.**

**The application is incomplete because it does not address the extent of new easement required if it is to be routed next to "existing easement."** It is misleading to state that a project is utilizing "existing easement" implying that additional easement is not required. Some of this project is claimed to utilize "existing easement." Existing easement in this context should mean that it is to be built completely on existing easement, and not require additional easement. For example, p. 6-7 of the application:

- Segment 1 "alternative" includes "options to double-circuit with existing 115kV and 69kV transmission lines..."
- Ditto for Segment 2...
- Does Segment 3, the 2<sup>nd</sup> circuit from North Roch across the river, need additional easement?
- Segment 4 will probably require all new easements.

It's not a matter of "what's one more line," because the easement is often not set up to account for "one more line." The impact of "one line" should not be dismissed or minimized. The EIS should take into account that one more transmission line is an extreme affront to those who have been through the agonizing process of giving up their land for CapX 2020 or any other transmission line. If they went through the CapX 2020 routing process, they experienced a time consuming and exhaustive excursion through the Public Utilities Commission's process. If they were lucky, their land was avoided. If not, and "their" route was selected, in addition to the Commission's process, they've had to negotiate an easement and/or slog through an eminent domain proceeding, deal with construction and the long term impacts... and now to be confronted again... it's grossly unfair targeting. Landowners previously affected thought it was over. Both the uncertain specter of transmission with their plans, with life, put on hold for the duration; or after participation through the process, the selection of someone's land -- these are extreme impacts.

Although these impacts may not be quantifiable, they're inherent in this process, and the

impacts on landowners can reasonably be anticipated, must be disclosed, and be given great weight.

**The application is incomplete because it does not document 21<sup>st</sup> century transmission additions in the vicinity, and must document and consider impacts of the threat of transmission to landowners.**

Similarly, for those confronted with their “first” transmission line, they will need to invest significant time to learn to navigate the process, attend meetings, speak up, compose comments, to be giving their best to explain what this project would mean to them, would do to them, how it would affect their lives, their land, and raise all the impacts that would befall them and all in their environment. It’s a big job, and few can comfortably participate in this process. The EIS should address the impacts extreme burdens on landowners going through this process.

**The application is incomplete because it rejects “Reactive Power Additions (5.2.6.3) yet predicts necessity for “ancillary support.”**

Transmission lines are inherently unstable, and the longer the line, the more unstable and the more “ancillary support” is needed. Were generation built near load, “ancillary support” would not be needed. Line loss in transmission is a given, but compensatory “support” is an effort and cost that should be disclosed. **The application must address how much reactive power is necessary for this line, in addition to quantifying real power on this line.**

**Estimated line losses expressed in terms of the “system” are meaningless**

**The application is incomplete because it discusses line loss in terms of “line loss” compared against the system, without disclosing the full system of which it is a part.** Without that full number, any “x” of line loss is meaningless, as any line loss for this one project would be a very small percentage of the entire system! It’s misleading.

For example, the estimated line losses for the Xcel MN Energy CON Lyon Co. to Sherco radial transmission line is, as stated in the Commission Order:

The two lines would be located on the same set of structures (i.e., a double-circuited transmission line) and would connect at least 2,200 megawatts (MW) of generation and deliver (after losses) approximately 1,996 MW to the Sherco Substation.

Where line losses are 10-12% or more on just this one line, it’s likely it’ll be a similar percentage for a similarly spec’d line of a similar length, soooooo...

**The application is incomplete because must state the full system MW loading used for modeling in Application 4.4.**

**The application is incomplete because it separately must establish line loss solely for this project by identifying the conductor specs, and amperage at 1) low amps, 2) expected operational loading amps, and 3) at rating amps, with losses expressed in MVA for each.**



## Electric and Magnetic Fields – Calculated – do not provide sufficient information

**The application is incomplete because it does not provide the full range of electric and magnetic fields nor does it identify the inputs (amps) for the calculations resulting in mG.** The Tables 7-19, p. 160-163 and 7-19, p. 164-170, list in the left 2 columns some information, but not enough to independently perform calculations. In Table 7-19, although rows state “average loading,” and “Max loading” there are no amperages stated.

**The application must add amperages to the chart column with the “loading” claims, and verify the calculations for mG.**

**The application must include magnetic field modeling for mva up to the amps & mva of the project as designed.**

The magnetic field calculations are based on only on “average loading” and “Max. loading” and we have no way of knowing what those loading amperages are. Typically, Xcel is downplaying the modeled magnetic field levels at the right-of-way edge, and this “Calculated Magnetic Field” must to be carefully vetted. Some of the “Maximum at Edge of Row” numbers are many times over the 2-4mG recommended by NIEHS RAPID, WHO, and ICNIRP guidelines:

Compare with the NIEHS EMF RAPID study and the WHO studies, recommending a mG level of 2-4 mG. And the ICNIRP guidelines should be addressed:

The International Commission on Non-Ionizing Radiation Protection (ICNIRP) concluded that available data regarding potential long-term effects, such as increased risk of cancer, are insufficient to provide a basis for setting exposure restrictions.

The American Conference of Governmental Industrial Hygienists (ACGIH) publishes “Threshold Limit Values” (TLVs) for various physical agents. The TLVs for 60-Hz EMF shown in the table are identified as guides to control exposure; they are not intended to demarcate safe and dangerous levels.

ICNIRP Guidelines for EMF Exposure		
Exposure (60 Hz)	Electric field	Magnetic field
Occupational	8.3 kV/m	4.2 G (4,200 mG)
General Public	4.2 kV/m	0.833 G (833 mG)

International Commission on Non-Ionizing Radiation Protection (ICNIRP) is an organization of 15,000 scientists from 40 nations who specialize in radiation protection.  
Source: ICNIRP, 1998.

ACGIH Occupational Threshold Limit Values for 60-Hz EMF		
	Electric field	Magnetic field
Occupational exposure should not exceed	25 kV/m	10 G (10,000 mG)
Prudence dictates the use of protective clothing above	15 kV/m	—
Exposure of workers with cardiac pacemakers should not exceed	1 kV/m	1 G (1,000 mG)

American Conference of Governmental Industrial Hygienists (ACGIH) is a professional organization that facilitates the exchange of technical information about worker health protection. It is not a government regulatory agency.  
Source: ACGIH, 2001.

3

In the several CapX 2020 proceedings, the magnetic field modeling was consistently understating the magnetic fields. See Attachment D, Affidavit of Bruce McKay, PUC Docket TL-08-1474.

**The application is incomplete because it must address the projected high levels of magnetic fields at the right of way edge and various distances from the centerline, and it must address the potential for extreme levels of magnetic fields if the transmission line is**

<sup>3</sup> Table from *Electric and Magnetic Fields Associated with the Use of Electric Power*, online at: [https://www.niehs.nih.gov/sites/default/files/health/materials/electric\\_and\\_magnetic\\_fields\\_associated\\_with\\_the\\_use\\_of\\_electric\\_power\\_questions\\_and\\_answers\\_english\\_508.pdf](https://www.niehs.nih.gov/sites/default/files/health/materials/electric_and_magnetic_fields_associated_with_the_use_of_electric_power_questions_and_answers_english_508.pdf)



operated at higher MVA than disclosed.

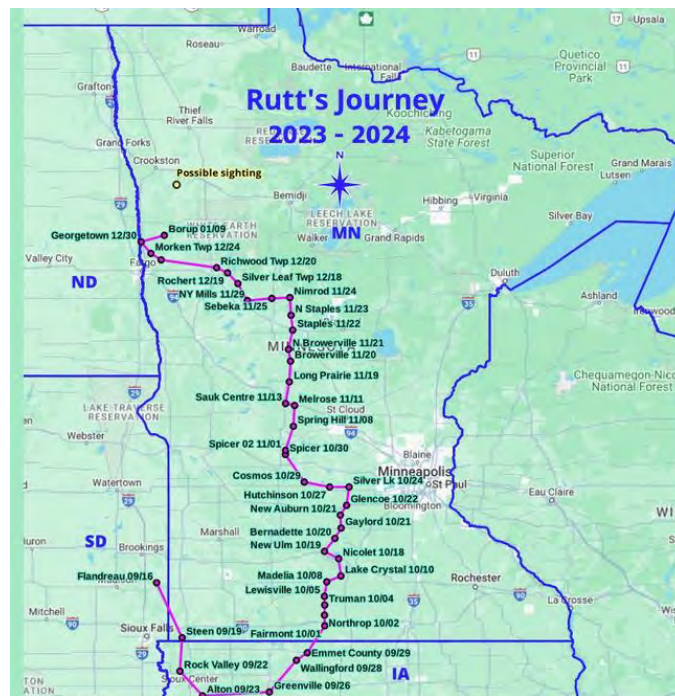
Applicants must add a sheet column in the tables showing distance from centerline at which calculated mG reaches 2-4 mG.

The application is incomplete because high capacity of this proposed project must be identified and evaluated

The application must address the rating of this line, amperage and MVA, of both of the 345 kV's 1) "bundled 2x636 kcmil 27/7 Twisted Pair ACSR "Grosbeak" conductor for the new 345kV transmission line," and 2) also the "[n]ew double bundled 954 kcmil ACSS/TW 20/7 "Cardinal" conductor ... as the second circuit..." accounting for both the "bundled" and "Twisted Pair" which result in a very high capacity conductor.

The application does not adequately disclose or consider impacts on wildlife

The application must consider the impacts of wildlife. An atypical impact not likely considered previously is that of resident and migrating wildlife, such as Rutt, the high-profile "Moose on the Loose," migrating across the area of this transmission line route. Rutt traversed the proposed routes of many of the transmission projects currently proposed in southern Minnesota.



Animals in the Cervidae family are particularly sensitive to, and avoid, ultra violet frequencies. See also Attachment D - Farmers blame livestock deaths on lead in water.

Socioeconomic impacts, positive and negative, must be fully addressed in the application

The application is incomplete because it must document and consider the socioeconomic impacts on communities.

Transmission impacts their tax base of counties, school districts, and local (city or township) through utility personal property tax revenue. **The amount of expected utility personal property tax for each jurisdiction must be disclosed.** That utility tax revenue to local governments must also be considered in relation to any local government support of this project, of any utility project, as utilities regularly appear before local governments promoting local projects, encouraging and soliciting local support, and these overt lobbying efforts should not be paid for by ratepayers!

**The application must disclose the method of calculating and the annual amount of CenterPoint utility personal property tax for the dome under the 8,400 acres of land!**

**The amount of compensation estimated to be paid to landowners for easements must also be disclosed and identified as a one-time payment or a stream of payments.** For the gas dome, back in the 1960s, landowners were given, even after a long court battle, a one-time very small payment for condemnation of land underlying most or all of their property. This matter was taken to the Minnesota Supreme Court, where landowners got no relief. All these decades later, the Prehn family, for example, receives only a \$100 check annually, while CenterPoint makes millions, perhaps billions, on natural gas stored underneath the Prehn home and acreage.

**The application must consider “Buy the Farm” payments, based on utility experience of percentages of landowners electing Buy the Farm in the CapX 2020 and other transmission proceedings.** These payments may be a benefit to landowners, and utilities which eventually sell the property, but this can be a considerable expense, and are assessed to ratepayers as a cost of building transmission.

**The application is incomplete because it should disclose the cost of undergrounding, and compare the cost of undergrounding v. cost of paying for fire damage, particularly because undergrounding would eliminate fire hazard.**

**The application is incomplete because it does not address the role of transmission related fires in Texas and California, a consideration given the large grassfire near Waseca last month, and the potential for utility liability (which could be transferred to ratepayers).**

Xcel has admitted the role of transmission in the large Texas fire, and another utility has admitted its role in a large fire in California. Just last month, in early March, there was a grass fire that burned roughly 1,700 acres near Waseca, not attributable to a utility but showing vulnerability to wildfire.<sup>4</sup>

### **THE CERTIFICATE OF NEED SHOULD BE REFERRED TO THE OFFICE OF ADMINISTRATIVE HEARINGS FOR A CONTESTED CASE HEARING**

This is a very high voltage transmission line proposal with much greenfield routing over many miles of southern Minnesota, and based on filings and comments, it is a highly contested proposal. This application should be referred to OAH for a contested case hearing. It is clearly

<sup>4</sup> Online at: [https://youtu.be/2MBuxhUaD\\_U](https://youtu.be/2MBuxhUaD_U); <https://www.keyc.com/2024/03/05/waseca-wildfire-three-injured-up-1700-acres-burned/>

not suitable for the informal process, which was designed for smaller projects that are not contested.

**THE CERTIFICATE OF NEED AND ROUTE PERMIT PROCEEDINGS COULD BE COMBINED USING JOINT PUBLIC INFORMATION MEETINGS, JOINT ENVIRONMENTAL IMPACT STATEMENT, AND JOINT PUBLIC HEARINGS.**

Because there are so many interested members of the public already participating, it would probably be better if the proceedings went forward jointly to allay confusion. It would, could, also be helpful to educate and encourage public insight and participation in the Certificate of Need side.

**THERE ARE CONTESTED ISSUES OF FACT WITH RESPECT TO THE REPRESENTATIONS MADE IN THE APPLICATION**

Yes, there are contested issues of fact, some of which are addressed above, and more of which will come out through Information Requests and the contested case.

**AN ADVISORY TASK FORCE SHOULD BE APPOINTED**

An advisory task force should be appointed. The Commission has dropped the public participation ball in failing to authorize task forces, despite many requests. This is a primary aspect of public participation in Commission proceedings, and though the legislature is currently attempting to repeal that part of the “Public Participation” statute, the current engrossment does leave intact the “Subdivision 2” mandate to the Commission:

Subd. 2. **Other public participation.** The commission shall adopt broad spectrum citizen participation as a principal of operation. The form of public participation shall not be limited to public hearings and advisory task forces and shall be consistent with the commission's rules and guidelines as provided for in section [216E.16](#).

Minn. Stat. §216E.08. In a push to rush projects through, and the words of the Commission in public meetings, “to make things easier for applicants,” “faster for the applicants,” “help the applicants get through the process more quickly,” the legislature, at the request of the Commission and its “streamlining, steamrolling effort, is now shamefully working to repeal Subdivision 1, “Advisory Task Force” and Subdivision 4, “Scientific Advisory Task Force.” However, it missed Subdivision 2, which, is proposed be retained and to move to Subdivision 1! Gutting the Power Plant Siting Act, fundamental Minnesota law, is a leap in the wrong direction, cutting many opportunities for public participation, contrary to the Commission’s public engagement mandate.

**This application is incomplete because legislation found in SF4784, and utility promotion of it, must be disclosed by all utilities, as is ALL utility lobbying.** However, this application states:

**4.7 Effect of Promotional Practices**

Xcel Energy has not conducted any promotional activities or events that have triggered the need for the Project. As discussed above, the Project is needed to address regional reliability issues across MISO’s Midwest subregion.

**THE COMMISSION SHOULD DIRECT THE EXECUTIVE SECRETARY TO ISSUE AN AUTHORIZATION TO THE APPLICANT TO INITIATE CONSULTATION WITH THE MINNESOTA STATE HISTORIC PRESERVATION OFFICE (SHPO).**

The Commission should direct the Executive Secretary to issue an authorization to the applicant to initiate consultation with the Minnesota State Historic Preservation Office (SHPO). This is the sort of no-brainer issue that should be approved in a “Consent Agenda” Order, and not procedural matters such as orders authorizing use of informal process for large contested projects..

**ARE THERE OTHER ISSUES OR CONCERNS RELATED TO THIS MATTER?**

Yes, there are issues or concerns related to this application, including, but not limited to:

**MISO IS NOT THE REGULATOR. THE COMMISSION IS THE REGULATOR.**

MISO’s “criteria” for its “approval” is very different from the Certificate of Need and Routing approval to be considered in the contested case before an ALJ and by the Commission.

The contested case, and the Commission, must not look at this project in isolation. There are other transmission line projects proposed in the area, and all must be considered to determine whether these projects, individually, or in segments, or in full, obviate the “need” for this project, and/or could serve as an alternative to this project -- specifically the Brookings-Hampton 2<sup>nd</sup> Circuit CN-23-200 and TL-08-1474; Big Stone-Alexandria-Big Oaks CN-22-538 and TL-12-159; and Xcel’s MN Energy CON Lyon Co. to Sherco 22-131 and 22-132.

**The Commission must look carefully at alternatives and combinations of alternatives, without rejecting alternatives out-of-hand as applicant does.** With batteries now an effective and reasonable alternative to transmission in some instances, batteries and solar near load could be a reasonable alternative to a segment or two, a project or two. The MISO configuration and “approval” is not a Minnesota criteria-based purpose or demonstration of “need.”

The Commission should consider alternatives that reduce the environmental impact of transmission by ELIMINATING need for much of it. An example is geothermal.

*Grid Cost and Total Emissions Reductions Through Mass Deployment of Geothermal Heat Pumps for Building Heating and Cooling Electrification in the United States<sup>5</sup>*

The abstract:

*This report presents the results of a study on the potential grid impacts of national-scale mass deployment of geothermal heat pumps (GHPs) coupled with weatherization in single-family homes (SFHs) from 2022 to 2050. GHPs are a technology readiness level 10, commercially available technology across the United States. This study is an impact analysis only; installed costs and available land areas for installing GHPs are not accounted for in determining their estimated deployment. The three scenarios studied were (1) continuing to operate the grid as it is today (the Base scenario), (2) a scenario to reach 95% grid emissions reductions by 2035 and*

<sup>5</sup> Online at: <https://info.ornl.gov/sites/publications/Files/Pub196793.pdf>



100% clean electricity by 2050 (the Grid Decarbonization scenario), and (3) a scenario in which the Grid Decarbonization scenario is expanded to include the electrification of wide portions of the economy, including building heating (the Electrification Futures Study or EFS scenario). The analysis team modeled each of these three scenarios with and without GHP deployment to a large percentage of US building floor space. In all cases, deployment of approximately 5 million GHPs per year demonstrated system cost savings on the grid, consumer fuel cost savings through eliminated fuel combustion for space heating, and CO<sub>2</sub> emission reductions from avoided on-site fuel combustion—and, in the case of the Base scenario, CO<sub>2</sub> emissions reductions from the electric power sector. GHPs have traditionally been viewed as a building energy technology. The most notable result of this study, however, is the demonstration that GHPs coupled with weatherization in SFHs are primarily a grid cost reduction tool and technology that, when deployed at a national scale, also substantially reduces CO<sub>2</sub> emissions, even in the absence of any other decarbonization policy.

See also: Renewable Energy: Distributed Generation Policies and Programs<sup>6</sup>

Distributed generation, siting generation near load, and particularly extensive rooftop solar, would also have an impact on “need” for the project. MISO is a marketing entity, and distributed generation conflicts with the MISO marketing agenda. This transmission line, as proposed, is a superhighway to Wisconsin and beyond, not needed by Minnesota and not in the public interest.

When considering alternatives, the Commission must keep in mind that a combination of alternatives may well meet the need, and must not separate out each potential alternative and base feasibility on whether an individual alternative meets the full claimed “need.”

The Commission needs to take a look at the standard environmental factors and more importantly a hard look at the Certificate of Need aspects of size, type, and timing that have an environmental impact. The mere suggestion that this project should be approved does not meet the applicant’s burden of proof, nor does the claim of “MISO approval.”

*No large energy facility shall be sited or constructed in Minnesota without the issuance of a certificate of need by the commission ... and consistent with the criteria for assessment of need.*

Minn. Stat. §216B.243, subd. 3.

A transmission project should only be approved based on the public interest regulatory definition of and criteria required to demonstrate need. It is not the job of ratepayers and landowners to shoulder the burden of fulfilling utilities’ corporate desires and wants.

Very truly yours,



Carol A. Overland

Attorney for the Prehn Family and NoCapX 2020

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<sup>6</sup> Online at: <https://www.energy.gov/scep/slsc/renewable-energy-distributed-generation-policies-and-programs>



Minnesota Lakes Region *March '72* Waterville - Le Sueur County - Minnesota

## Minnegasco Reports Satisfactory Operations In Waterville Area

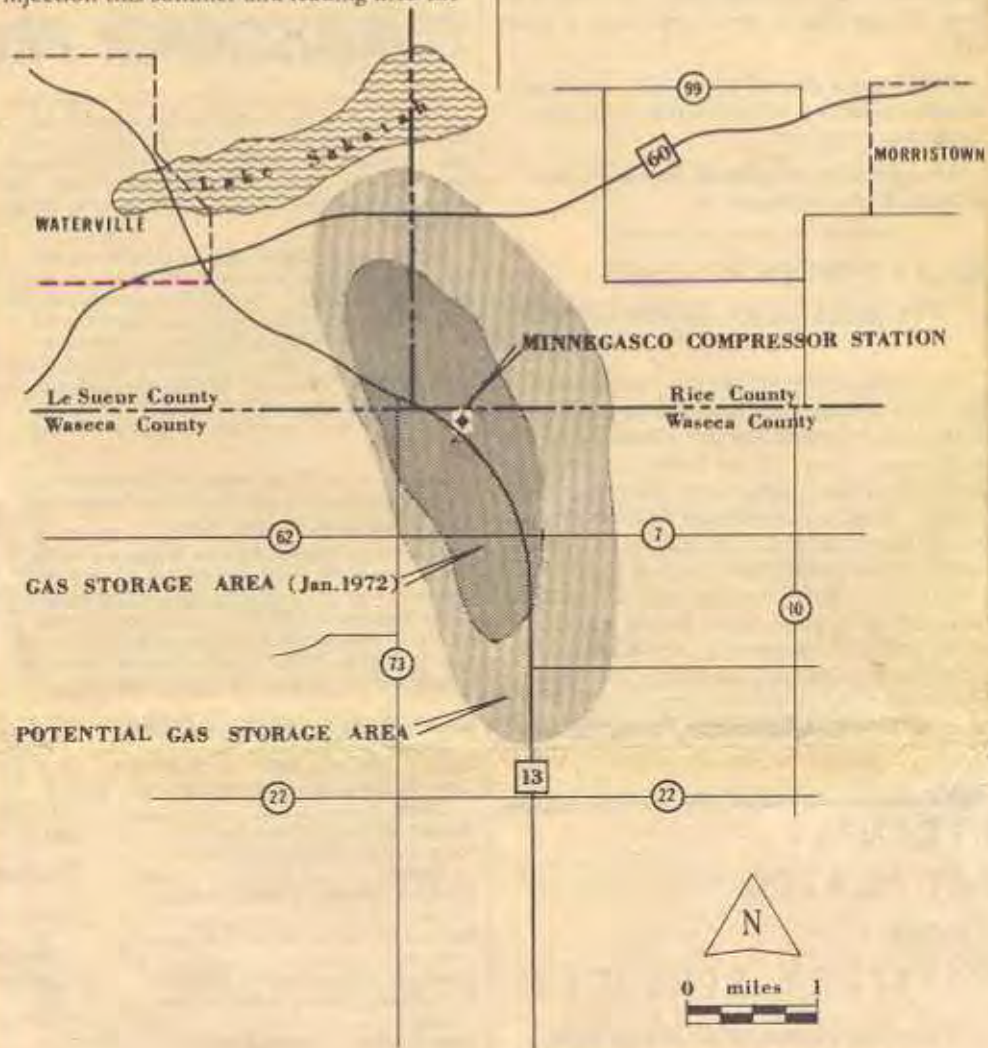
Minnegasco has withdrawn one billion cubic feet of natural gas this year from its underground storage area near Waterville.

The company has reported satisfactory operations in the first use of the underground storage area during the 1971-72 heating season.

When withdrawal operations started on January 13 the company had approximately 3.7 billion cubic feet in storage. Tentative projections call for Minnegasco to have approximately six billion in storage following injection this summer and leading into the

next heating season. Amounts injected are in accord with limits set by the Minnesota Department of Natural Resources.

The company continues to coordinate its step-by-step development of the underground area with the state agency. The accompanying drawing indicates the storage area now being utilized (inner shaded area) and also the area which represents its potential storage capacity. Total capacity of the underground area is estimated at 20 billion cubic feet.



Minneapolis Gas Company

UNDERGROUND GAS STORAGE AREA





At Minnegasco hearing

# Residents fume over more gas storage

No known health or environmental problems have been caused by Minnesota's only underground gas storage reservoir, scientists from the state and Minnegasco testified in a hearing held at the Waseca County Courthouse Thursday.

About 60 residents in the Waterville and Waseca area, however, suggested the possibility of correlation between the reservoir and water pollution, the death of livestock and even an increase of human mortality in the area.

The hearing was held in regards to an application to increase the limits of underground gas storage in the underground storage cavity north of Waseca at the Waseca-LeSueur county line.

Minnegasco is asking for an increase of 5 billion cubic feet in addition to the present 21 billion cubic feet in storage.

Gas is piped into the rock-capped reservoir year around and withdrawn during the winter when the demand is the highest. The project has been in operation about three years.

Lynn Kanne, Waseca, pointed out that the death rate in Waseca County has increased 12.2 per cent since 1968 and the death rate in Blooming Grove Township was 20 per cent higher than in 1968.

"What is wrong in Waseca County?", he asked. Kanne stated that he thought nothing should be done until the increased death rate was explained. "I'm not asking you these questions to harrass you, but I am trying to find answers," he said.

Mark Kanne, Lynn's brother, presented a sample of the water from a well near the storage area to the DNR board and questioned the purity of it.

The board appeared skeptical of Kanne's request stating that over 100 water samples had been taken from wells near the storage site, indicating that the gas was not affecting the water supply.

Kanne submitted a letter with results of a water test by the Minnesota Valley Association of New Ulm to the board showing the lead content in the water.

Kanne said that the water

test made at his well and the Sakatah Park well revealed lead content of 4.3 from the Kanne well and .64 from the Park well. He said that the most lead a person can consume is .05 parts per million, and said the lead result in his well and the park was 12 times higher than that amount.

Kanne said this was dangerous to the people's health.

Gene Hollenstein, DNR's chief hydrologist, promised Kanne that the health department would investigate the situation.

Dale Wikre, member of the Pollution Control Board told the board they will be required to get an agency permit to dispose of the water brought to the surface with the gas.

Steve Gadler, member of the Pollution Control Board speaking for himself, pointed out that the gas Minnesota residents are using is highly radioactive because the gas comes from the southwest where atomic bombs have been set off to create the gas supply.

"I think all you're doing is

polluting the public," he charged.

Gadler proposed that the DNR department hold a new hearing after this was looked into further, before more gas is introduced into the area. "It's a serious problem"

Dr. Paul Wetherspoon, DNR's consultant on the project and professor of geological engineering from the University of California at Berkely, said that the DNR exercises control over the project that is "far greater than that exercised elsewhere in the county." Dr. Wetherspoon also said that no natural gas in the United States has any man made radioactivity in it at the present time.

Gene Hollenstein, Chief Hydrologist said the hearing was not necessary but that the DNR board wanted everything to be public record and let everyone have a chance to speak on the issue.

Director of Natural Resources, Robert Herbst, said the department will hold the hearing record open for 20 days and may call another hearing upon request.

The storage area lays under 8,400 acres of farm land near Waterville.



Volume 90 - Number 20

THURSDAY, MAY 14, 1970

# Gas Company Will Drill Well In Sakatah State Park

The Division of Parks and Recreation of the Minnesota Department of Conservation has granted permission to the Minneapolis Gas Company to drill an exploration well in Sakatah Lake State Park.

The purpose of the drilling operation is to determine the contour of the substrata rock formation down to the known Jordan foundation rock formation. Drill operations will not interfere with the normal park activities and it is anticipated to be completed early in June.

The well will be cased, capped and sealed in such a manner that it can be used as a water supply well for serving future public facilities that will be developed in the park in the future.

The well will be drilled by Born Well Company of Waseca. Dr. C. Fred Quest of the Minneapolis Gas Company will be in charge of the project.





10 - WASECA, MINN., JOURNAL Wednesday, March 12, 1969



KENNETH DAHLE OF BLOOMING GROVE township stands beside a dead cow on his farm just off Highway 13. Dahle said, "Due to fact that many of the animals died, he decided to ship the rest to market." This photo was taken in January at the Dahle farm.

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## Farmers Blame Livestock Deaths on Lead in Water; Minnegasco Denies Gas Storage Is Cause

### Landowners to Continue Fight Against Pollution

Area farmers pledged themselves last week to continue the fight against the Minneapolis Gas Company. It is a fight that has been going on for several years, ever since the Minneapolis firm set out to get signed contracts at \$50 an acre for the storage of natural gas beneath 8,400 acres of Waseca, Rice and LeSueur county farm land.

The battle began first on the price offered under the contract, then it was enlarged to include the stipulation for the purchase of small tracts of land from farmers on whose land the injection wells were dug or on which test holes were sunk to measure the underground pressure at all times.

At one time some land owner objected to the perpetuity clause in the contract. This makes the contract never-ending and one owner suggested at least a 99-year termination.

### Dr. Quest Says Bentonite Doesn't Contain Lead

Minneapolis Gas Company insists that there is no danger connected with the storage of natural gas and that there could be no pollution, despite landowner charges.

Dr. C. F. Quest, geologist with Minnegasco, says that Western Bentonite has U. S. Pharmaceutical approval as an animal feed additive in the range of two to four per cent as a pelletizing agent.

While it is produced by National Lead Company and that firm has its name on the bag, Dr. Quest said that to his knowledge it has no lead in it.

"It is used by water well diggers throughout the area," he added.

Dr. Quest said that they had tested the water in wells for a distance of 14 miles out from the center of the cap and found nothing beyond the normal variations.

He also stated that the St. Peter sands produce an iron



holes were sunk to measure the underground pressure at all times.

At one time some land owner objected to the perpetuity clause in the contract. This makes the contract never-ending and one owner suggested at least a 99-year termination.

Rumors that the drillers had struck oil was not like oil on troubled waters. In fact it had the opposite result.

Last week the landowners met in the Waseca County Soil Conservation office. They had lost a court ruling to Minnegasco over the right of eminent domain. The court ruled that the firm did have that right under Minnesota law.

Gene Miller of the Soil Conservation office said that they had been tardy in taking action but pledged that they will compile all the facts they can concerning underground storage of natural gas.

Pollution of water wells is claimed by the landowners. Some have reported the loss of livestock because of this pollution. Kenneth Dahle says that he has lost 22 hogs and nine head of cattle and his uncle, Sydney Dahle, reported losses as well.

The farmers sent vital organs of their dead animals to the University of Minnesota and one farmer reported at the meeting that the diagnostic lab gave the cause of death as lead overdose.

Water samples, they said, were sent to another laboratory and the report coming back indicated a high lead content.

Dean Vik, Faribault Daily News Area Editor, said in his report of the meeting that "primary evidence to support their claim on this matter are laboratory reports which state material known as 'quick-jell' and sold under the trade name Bentonite, used for sealing drill holes, contains a high amount of harmful lead which pollutes groundwater. The farmers contend this material in many instances had been disseminating and traveling with water underground and entering farm wells."

Lee Fullerton, Rice county zoning administrator, was the principal speaker at the meeting. Don Spavin, Staff Writer of the St. Paul Pioneer Press, writes that Fullerton "has in the past indicated opposition to the gas storage idea."

Fullerton suggested a public hearing to involve the Minneapolis Gas Co., the Minnesota Department of Conservation, officials of Rice, LeSueur and Waseca counties, the Cannon River Improvement association, pollution control officials and wildlife groups.

Lynn Kanne also spoke and showed slides of the Redfield, Iowa, natural gas storage area.

gers throughout the area," he

Dr. Quest said that they had tested the water in wells for a distance of 14 miles out from the center of the cap and found nothing beyond the normal variations.

He also stated that the St. Peter sands produce an iron carrying bacteria that lives without oxygen. It attacks the well casings and when exposed to the air produces a sludge.

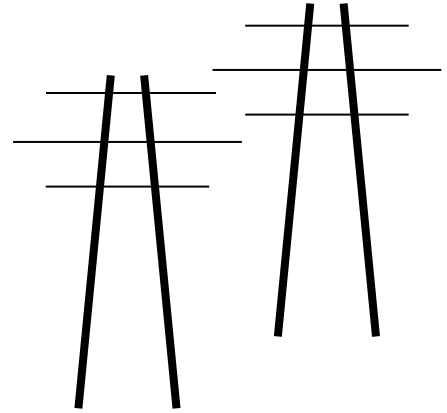
The city of Waterville, he said, had water trouble when they drew from the St. Peter level but have had better water since drilling to the Jordan sands.

Dr. Quest said that he expects to be in Waseca Thursday forenoon to confer with Soil Conservationist Joe Gablou.

## Legalelectric, Inc.

**Carol Overland** Attorney at Law, MN #254617  
Energy Consultant—Transmission, Power Plants, Nuclear Waste  
overland@legalelectric.org

1110 West Avenue  
Red Wing, Minnesota 55066  
612.227.8638



April 29, 2024

Will Seuffert  
Executive Secretary  
Public Utilities Commission  
121 – 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101

via eDockets & consumer.puc@state.mn.us

RE: The Prehn Family & NoCapX 2020 Reply Comment on Completeness, etc..  
Wilmarth-N Rochester-Tremval or Mankato-Mississippi Transmission Line  
PUC Dockets ECN-22-532 and TL-23-157

Dear Mr. Seuffert:

I'm filing these comments on behalf of the Prehn Family, who live along Segment 1, and on behalf of NoCapX 2020, an intervenor with local grassroots groups in three of the CapX 2020 dockets, including some areas which are again targeted, this time with the Wilmarth-North Rochester-Tremval transmission.

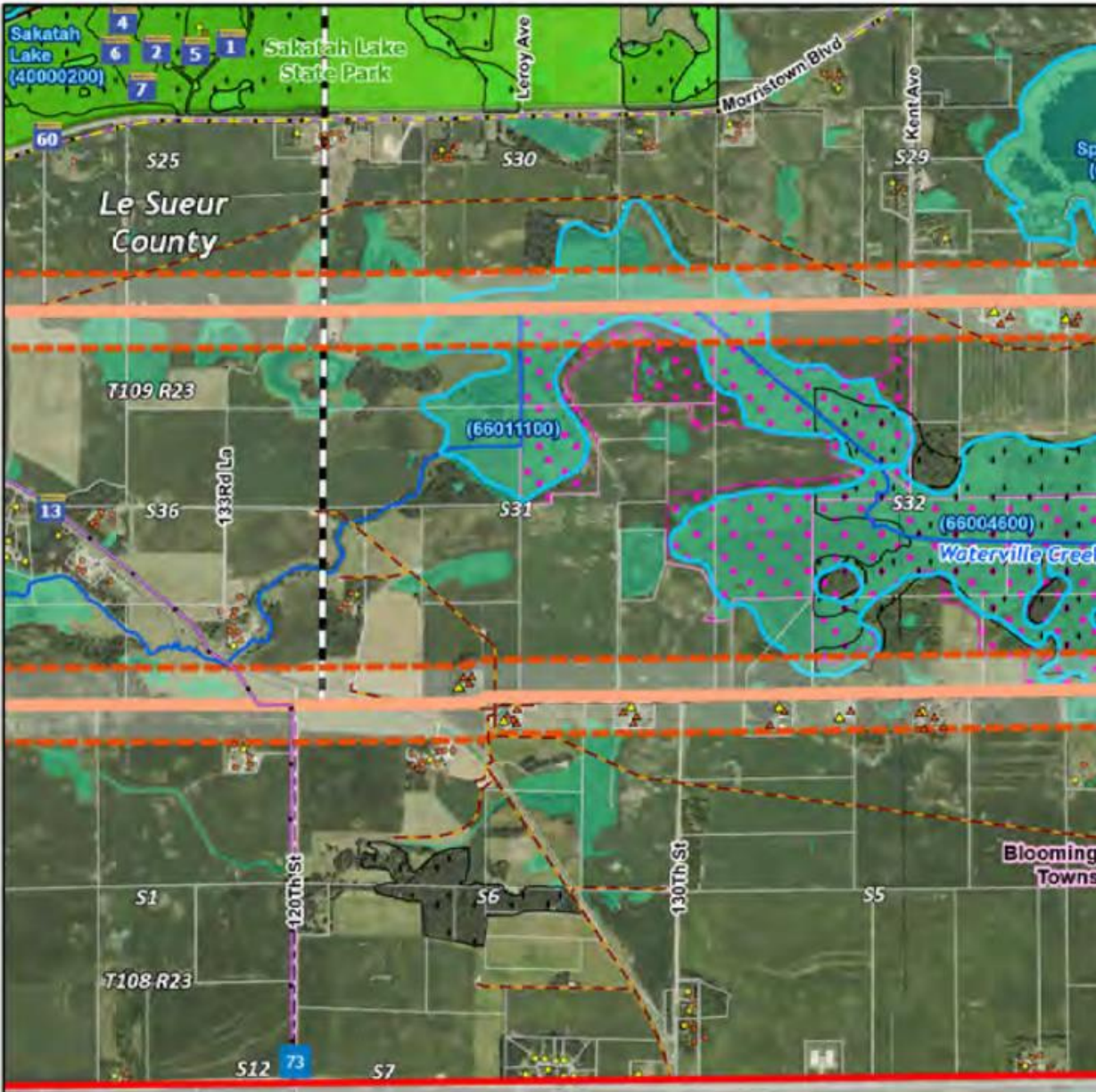
These Reply Comments are based on the Comments filed by members of the public, MISO, Operator 49 & Carpenters, and Commerce DER and EERA. In addition to these Reply Comments filed, it's as important to note who all did not file Completeness Comments. There were no filings from the usual suspects, including those that filed in CN-22-538, jointly Audubon Upper Mississippi River, Clean Grid Alliance, Center for Rural Affairs, Fresh Energy, Minnesota Center for Environmental Advocacy, Sierra Club, the Citizens' Utility Board of Minnesota, and Union of Concerned Scientists (However, note that Reply Comments were filed, though **NOT** Reply Comments.) and LIUNA. Considering the proximity of the CN-22-538 beginning at Big Stone and many of those organizations opposition to the Big Stone II transmission, this omission is odd.

I also note that the Department of Natural Resources (DNR) did not comment either. The DNR is the permit issuer for the Minnegasco, now CenterPoint, 13.25+ square mile, 7 billion+ cubic foot underground natural gas storage dome that is located in Segment 1, in the area shown in map #8 of the Segment 1 maps. There is no mention of this gas dome and its range in the application.



The portion affected is shown here:

## DETAILED MAPBOOK: SEGMENT 1

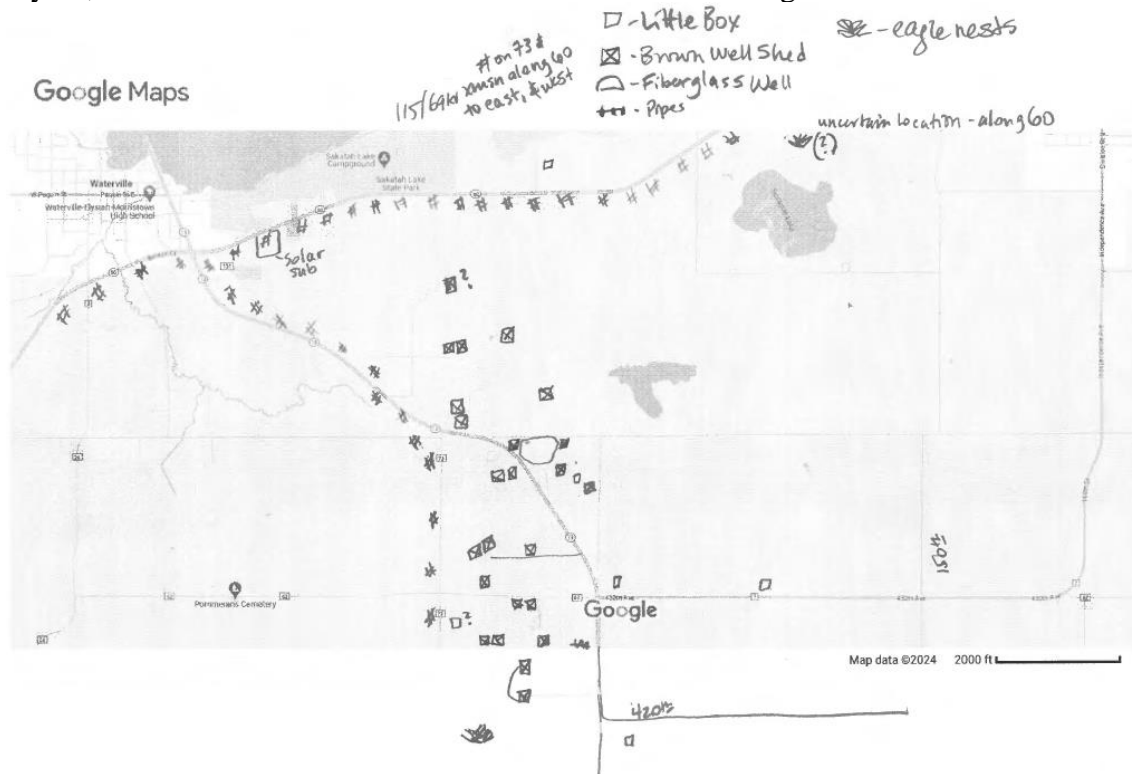


I have submitted a Data Practices Act request for information regarding the gas storage facilities, attached.

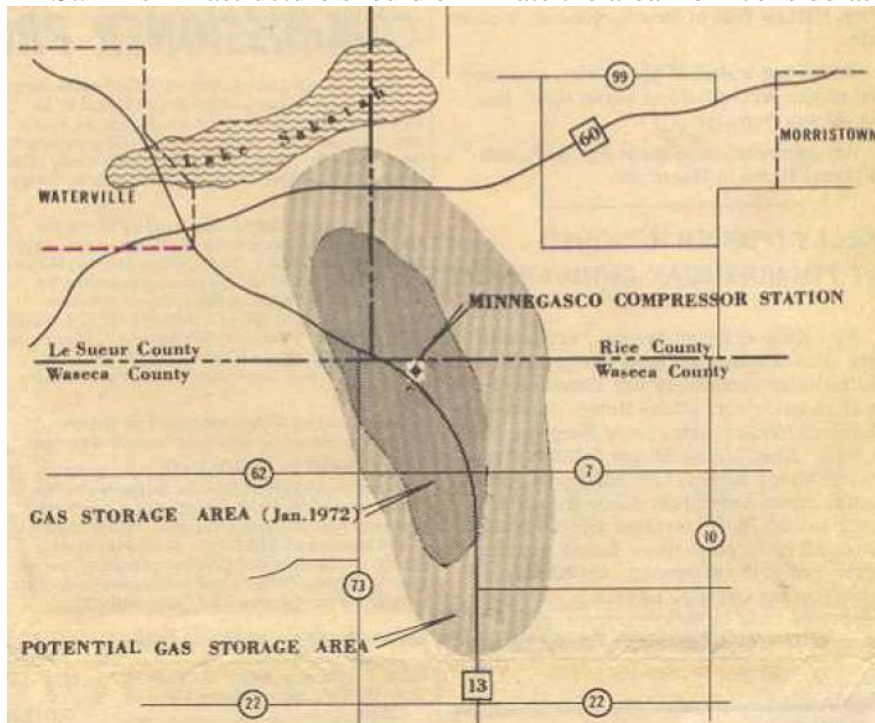
Recently, Kimber and Nancy Prehn and I made a pretty thorough investigation of this area, important to them as there are gas wells on their property, and we located the wells, gas input and water output, plus a number of smaller “monitoring” wells, though it’s not clear what they are monitoring. The map of our findings is below, with gas facilities extending from the north portion of map #8, in Sakatah State Park, to just below the southern portion of map #8, on the



south side of 42X street. The Prehns live in the center of this gas infrastructure, on the west side of Hwy 13, across and a little south from the CenterPoint building and water treatment facility:



Again, I've requested a file inspection from the DNR, and in particular seeking the map to confirm these locations and add ones that we've missed. The last known map was from the proposed expansion in 1972, which corresponds with our findings – to the north in Sakatah Park and south of 42X St. This infrastructure should eliminate the area from consideration.

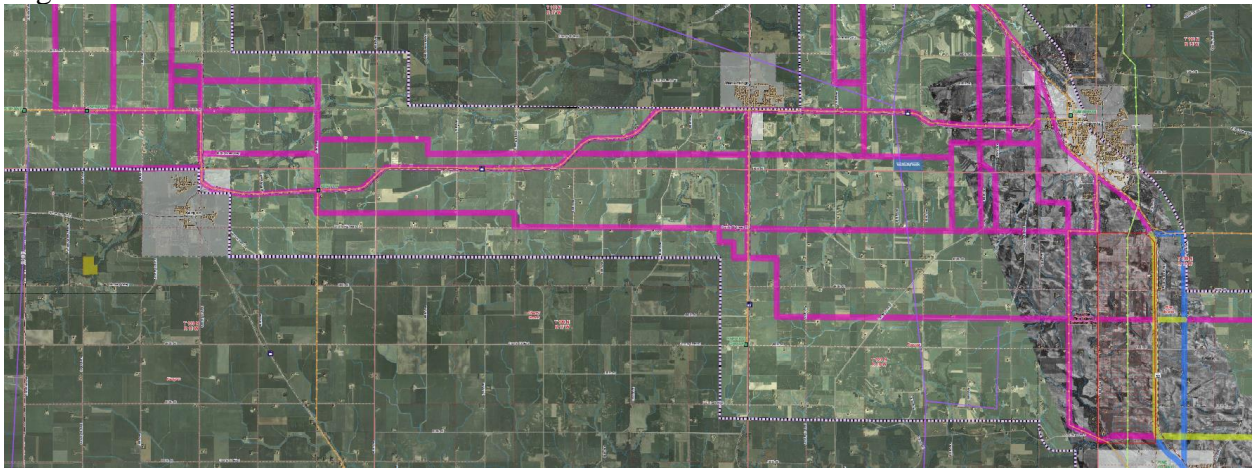


## Comments of MISO

MISO promotes use of the “informal” process<sup>1</sup>, emphasizing its role in the “open and transparent planning process” for the region<sup>2</sup>, with “stakeholder input throughout,”<sup>3</sup> and a claim of “independent assessment and perspective of the needs of the overall transmission system”<sup>4</sup> and “development of necessary transmission projects.”<sup>5</sup> These claims are far beyond a stretch.

Informal process was developed for smaller projects that are not contested. This is a project with Segments 1 with 48-54 and Segment 2 34-42 miles **completely greenfield route**. **Many along this route were confronted with CapX 2020 proposals on or near their land.** See map below. Segments 3 and 4 follow “existing transmission corridors,” or “existing transmission corridors and Highway 52 for most of its length...” or “roads, property lines and existing transmission lines.”

CapX 2020 from Hampton to La Crosse was proposed using these routes – compare with Segment 2:



See CapX 2020 sheetmaps: *TRL\_081202\_24kCorridors\_sheetmap\_2.pdf*

The claim of “existing corridors” is specious, because some are admittedly new along a highway or roads or property lines, and others along transmission corridors which presumable would require additional width to accommodate the new line routing.

“Open and transparent planning process” and “stakeholder input throughout,” Really? MISO does not allow public participation in its process. Stakeholder? Only those who can pay to become a “stakeholder” are, well, deemed a “stakeholder.” The public, and specifically this writer, this member of the public, has been prohibited from attending MISO planning meetings, despite YEARS of attendance and participation in the MAPP SPG meetings in Elk River and elsewhere. If MISO claims this is not now correct, please let me know the location, dates and

<sup>1</sup> MISO Comment, p. 1.

<sup>2</sup> MISO Comment, p. 2.

<sup>3</sup> Id., see also p. 4, “This process involves numerous evaluations of project proposals and their effectiveness, and provides multiple opportunities for **stakeholders** to review project need, design, and effectiveness.” Right...

<sup>4</sup> MISO Comment, p. 3.

<sup>5</sup> Id.



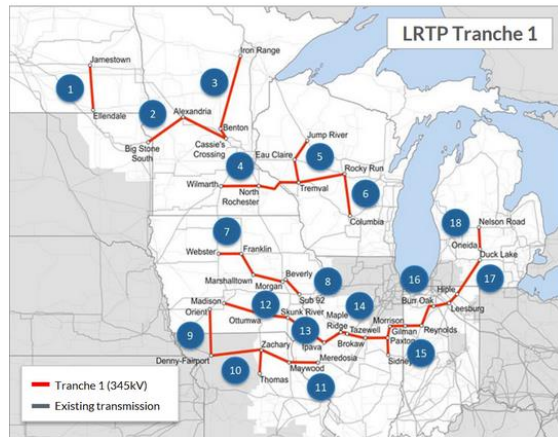
times of future meetings and this writer will attend as possible.

There are two important distinctions to be made in this and all other MISO projects:

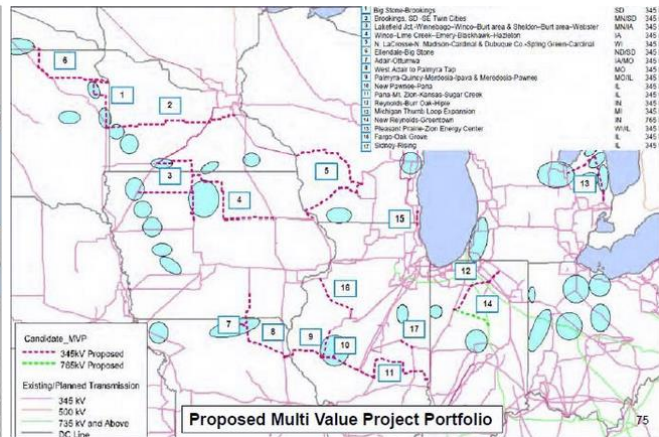
- The “benefits” touted by MISO are to the utility and transmission owning members of MISO.
- The “criteria” for development and proposal (deemed by MISO as “approval”) of a project is very different from the PUC criteria of Minn. Stat. §216B.243, and the routing criteria of Minn. Stat. ch. 216E.

MISO also advocates for this project not independently, but as a part of “MISO’s LRTP Tranche 1 portfolio” which it claims “will bring numerous benefits to the MISO Midwest Subregion<sup>6</sup>, including Minnesota.” This specific project must not be considered in a vacuum. There are numerous other projects in the area to consider, each of which would affect the “need” of the others. How much transmission do we need? Let’s see this on ONE MAP!

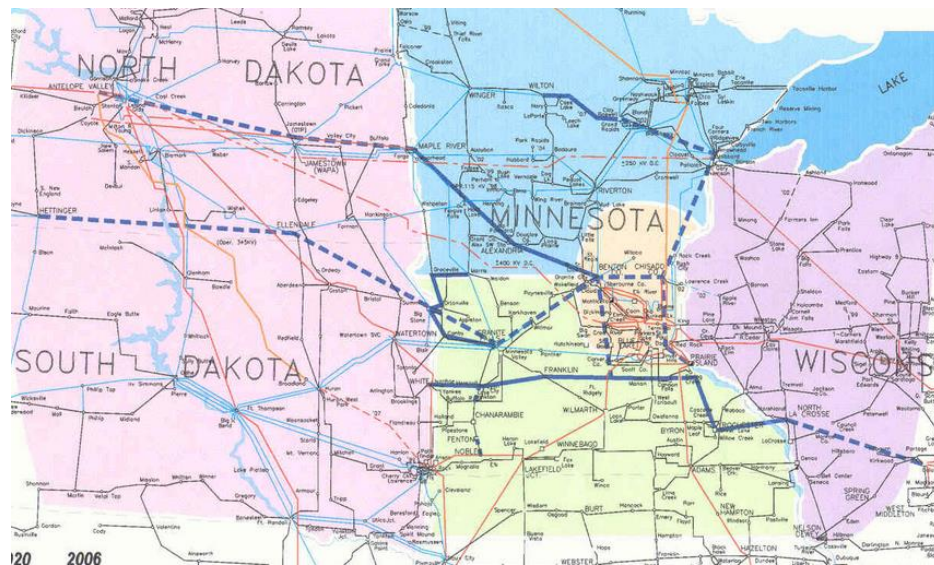
### Tranche 1



### MISO MVP Portfolio



Note how much of Tranche 1, particularly in northern Iowa and southwest Minnesota tie together? And all that’s on top of **CapX 2020**:



<sup>6</sup> “The “Midwest Subregion” refers to MISO’s Central and North Regions that begin in Missouri and extend northward.” MISO Comment, p 4.

MISO states that “The informal review process would likely help meet the earlier in-service aspirations that is closer to the 2028 in-service date contained in MISO’s MTEP planning”<sup>7</sup> and MISO then refers to the Application, fn. 16, which states, “In MTEP21, MISO listed an expected in-service date of June 1, 2028 for LRTP4.” MISO’s expectations do not bind, and are not relevant to, the Minnesota Public Commission’s review, particularly because the review of MISO and the PUC are based on different criteria, different attribution of benefits, and specifically of the role of the Commission’s mandate for the public interest and public participation.

MISO raises the specter of electrical disaster, “For example, such a disturbance took place in mid-February 2021 when unusually cold weather descended upon the middle of the continental United States.”<sup>8</sup> This reference to the Texas/ERCOT shutdown due to Texas and ERCOT’s failures. This claimed link and basis for “need” is histrionic, particularly where Minnesota gas utilities were held accountable, for failures of planning and utilization of gas storage capacity.

MISO claims that “[t]he project would provide substantial reliability, economic, and public policy benefits to Minnesota, and contribute to continued development of a reliable and economical regional transmission system.”<sup>9</sup> MISO doesn’t show benefits to “Minnesota” in its MTEP, and this reinforces that it’s all about the “regional transmission system.” MISO needs to separate out the “benefits” and clearly state the recipient of “benefits” to show how this is good for Minnesota, how this is in the public interest.

MISO also states that because “[t]he Commission has used the informal review process for other Tranche 1 projects – the Northland Reliability Project<sup>10</sup> and the Big Stone South Project<sup>11</sup>. The progress showing in those cases should be repeated in the instant proceedings.” The next sentence however is a noteworthy turn of phrase: “The Project proposed by the Applicant has a unified pedigree for its components...”<sup>12</sup>

MISO goes on to state that “the Joint Application should be considered accurate...” but omissions have been demonstrated, and need has not been demonstrated. That is the burden for the Applicant and for the Commission to determine. Further, an application for a transmission Certificate of Need and Route is not for MISO to decide, and this project is not suitable for the “informal process.” The deadline for a request for a Contested Case is the end of the Public Comment period on July 8, 2024.

### **Comments of Commerce-DER**

DER rushes through its comments and advocates for “informal process,” reverses C & D in

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<sup>7</sup> MISO Comment, p. 3.

<sup>8</sup> MISO Comment, p. 4.

<sup>9</sup> MISO Comment, p. 5.

<sup>10</sup> In re Northland Reliability Project, Docket No. E015, ET2/CN-22-416 (415 omitted by MISO).

<sup>11</sup> In re Big Stone South-Alexandria-Big Oaks 345 kV Transmission Project, Docket No. E002, E017, E015, ET10/CN-22-538. Reference to this project makes no sense as MISO doesn’t seem to recognize the current status of project and timeline – the EA is not expected to be released until May 22, Public Hearings June 13, 17 & 18, and Public Comments on both **CoN** and TL not due until July 8.

<sup>12</sup> MISO Comment, p. 5.



recommending denial of contested issues and of use of an Advisory Task Force. In recommending denial of a Task Force, it appropriately defers to EERA.

In its table, DER acquiesces to the notion of use of “system losses” rather than “Description of Facility: Line Losses.” After the clarification in the MN Energy CON docket that line losses of 10-12%, ~204 MW are expected for that 160-180 line, that reinforces of consideration of the PROJECT losses. Long transmission lines are inherently inefficient due to line losses. For that project, to receive the 1,996 MW, it will have to build and insert another 204 MW at ratepayer expense, in addition to the \$1.14 billion cost of that project. Long projects, even transmission generally, should not be exempted from disclosing project specific line losses.

Because this project traverses southern Minnesota, this project must not be considered in a vacuum. Need? The CapX 2020 Brookings line was constructed, and it was proposed through the same area as is now proposed for Segment 2. Do we need to go through that again? When there’s the Big Stone to Alex project, Brookings-Hampton 2<sup>nd</sup> circuit, the MN Energy CON, project and the recent Hunley-Wilmarth project, MISO’s MPV 3 & 4, where’s the need? The current wealth of proposed projects looks like overkill, and it is the Applicant’s burden to demonstrate need. How would this be done but for a contested case? Commerce and the Commission need to look at the big picture – perhaps drawing it all out on a map would be clarifying.

Further, this project, considered in concert with other projects in the area ongoing as we speak, and also recently permitted and constructed, should not be exempted from the “No-Facility Alternative.

### **Comments of Department of Commerce – EERA**

In Comments about the “Project Purpose,” EERA accepts the framing of Applicants, and this skews the review by EERA, as well as DER. It also essentially confirms that this project is a Minnesota pass through. How is this in the public interest? How will Minnesota benefit?

In statements about the Segments do not clarify if those parts of the Segments utilizing “existing transmission lines” or “transmission corridors” will require expansion of existing corridors. A problem we discovered during CapX2020 was that there were improper claims that field lines, property lines, and roads are “existing corridor.” EERA must assure this error will not occur again – in the application there is a statement of use of property lines and roads.

Regarding the Public Hearing, EERA also waffles without a clear recommendation. In this case, there should be a joint hearing, that parties and the public provide testimony and comments, that the public be allowed to question witnesses AS PROVIDED BY STATUTE AND RULE, that the parties make sure witnesses are available for questioning, and that question and testimony be under oath. Finally, the AL should make “a full report with findings of fact, conclusions of law, and recommendations regarding the project.

EERA waffles on Advisory Task Force. Use of Advisory Task Forces has been disfavored by the Commission, and in doing so, limit not only public participation, but disclosure and

identification of relevant environmental issues, conditions, and impacts. Also in other dockets, Commerce in appointing members of task forces have limited membership and participation to local governments. This is NOT the intent of the Advisory Task Force law, it is to further public participation, not limit it to local government participation. As EERA notes, “controversy factors weigh slightly in favor of a task force,” and that “an advisory task force might be helpful,” and then says it’s not warranted. ???

Regarding completeness, it’s not just lakes that are not included in the application. As above, the underground natural gas storage must be disclosed and considered, and the DNR must be required to provide the information about it.

EERA does not seem to recognize that those along Segment 2 have been through this before with the CapX 2020 project. The threat of transmission takes a toll on landowners, and this should be recognized as an intense impact.

**Comments of Operating Engineers Local 49 and North Central States Regional Council of Carpenters**

These labor union make no substantive comments about this particular project, particularly in light of all the other projects now ongoing. Transmission and wind projects are now solidly hiring union labor.

**Comments of members of the Public**

Comments have been received by members of the public.

Starting with Ryland Eichhorst, Mayor of Oronoco, he has expressed a routing request, an avoidance request, which does not relate to completeness, but should be considered as a route alternative.

Oronoco, as a Comment, filed this routing request, which should be considered as a route alternative:

That the City Council of the City of Oronoco supports including in the Route Permit application for the Segment 4 proposed transmission line with the Minnesota Public Utilities Commission, at least one alternative for the new single-circuit 161 kV line that includes essentially following the existing CapX2020 transmission line route from the North Rochester Substation to the Chester Junction.

Dale Thomforde of Pine Island, also a Supervisor on New Haven Town Board, though speaking as individual, requests two alternatives, both of which should be considered as a route alternative.

Trevor Scrabeck note that he was omitted from the List of Landowners Along and Adjacent to Route Alternatives, Appendix P of the Application. Scrabeck should be added and best efforts be made to assure he receives notice in the future.

The above are the Reply Comments of The Prehn Family and NoCapX 2020.

We again request a Contested Case for the Certificate of Need and Route dockets, and request an Advisory Task Force, consisting of not only local governments but local landowners and landowner groups and other public interest groups.

Thank you for the opportunity to submit comments.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Carol A. Overland".

Carol A. Overland

Attorney for the Prehn Family and NoCapX 2020



## Data Request Form

Date (mm/dd/yy):

Name: Carol A. Overland - Legalectric

Address: 1110 West Avenue

City: Red Wing

State: MN

ZIP code: 550566

Phone number: (612) 227-8638

Email: [overland@legalelectric.org](mailto:overland@legalelectric.org) (preferred)

**Note:** You do not have to provide any of the above contact information. However, we may not be able to clarify your request or provide copies without contact information. All requests must be made in writing by using this form or by sending an email or letter.

Please describe the data you are requesting in the box below and if you would like us to provide:

☒ Inspection

☐ Copies

I'm requesting a file inspection, seeking information on CenterPoint's (formerly Minneogasco) natural gas storage in the dome along Hwy 13, between Waterville & Waseca, specifically including, but not limited to:

- 1) Information on the current capacity of the dome storage;
- 2) Map of the physical location;
- 3) An accurate map of the boundaries of the dome storage showing underground and enough of roads and landmarks on surface to identify where it is;
- 4) Documentation of 1972 drilling at Lake Sakatah State Park;
- 5) Documentation of whether gas dome storage extends under Lake Sakatah State Park;
- 6) Copy of the ORIGINAL/INITIAL license/permit for the facility;
- 7) Copy of the current license/permit for the facility;
- 8) Copy of water treatment plant license/permit;
- 9) Contact info for consulting engineer --years ago Dr. Wetherspoon's health was failing and I'm guessing he's no longer on the project.

... and such other as is in the file.

Thanks,

MS § 13.03, subd.3, authorizes DNR to charge fees to recover costs to provide copies of data. Prepayment is required prior to receiving copies of data.

Submit by mail, fax, or email to:

Minnesota Department of Natural Resources  
Data Practices Compliance Official  
500 Lafayette Road  
St. Paul, MN 55155-4075  
Fax: 651.296.0902  
Email: [datarequest.dnr@state.mn.us](mailto:datarequest.dnr@state.mn.us)

For questions, call the Data Practices Compliance Official at 651.259.5345



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**Filer Information**

**Filer:** Overland, Carol  
**Company:** Legalelectric - Overland Law Office  
**Email:** overland@legalelectric.org  
**Phone Number:** 612-227-8638

**Document Information**

**Document Date:** 04/29/2024  
**Document Type:** Comments  
**On Behalf Of:** The Prehn Family and NoCapX 2020

**Service List Information**

Docket #	List Name
22-538	Official CC Service List
23-157	TL-23-157

**Existing Dockets Information**

Related Industry	Year	Number
Energy	22	538
Energy	23	157

**Uploaded Documents Information**

Selected Document	Classification	Additional Information
No CapX-Prehn Family_Reply Comment.pdf	Public	Reply Comment of The Prehn Family and NoCapx 2020

**Electronic Service**

Last Name	First Name	Email	Company Name
Ahern	Michael	ahern.michael@dorsey.com	Dorsey & Whitney, LLP
Albrecht	Steve	Steve.Albrecht@shakopeedakota.org	Shakopee Mdewakanton Sioux Community
Anderson	Kristine	kanderson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transm
Anderson	Keith	keith.anderson@shakopeedakota.org	Shakopee Mdewakanton Sioux Community
Anderson	Jay	jaya@cmpas.org	CMPAS
Arsenault	Jaime	jaime.arsenault@whiteearth-nsn.gov	White Earth
Bell	David	david.bell@state.mn.us	Department of Health
Benjamin	Melanie	melanie.benjamin@millelacsband.com	Mille Lacs Band of Ojibwe
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Birkholz	David	david.birkholz@state.mn.us	MN Department of Commerce
Bissonnette	Michelle F.	michelle.bissonnette@hdrinc.com	HDR Engineering, Inc.

# 4-29-2024 Prehn & NoCapX Reply Comment

Last Name	First Name	Email	Company Name
Boldt	Hunter	hunterboldt@redlakenation.org	Red Lake Nation
Boyd	Sheldon	sheldon.boyd@millelacsband.com	Mille Lacs Band of Ojibwe
Brown	B. Andrew	brown.andrew@dorsey.com	Dorsey & Whitney LLP
Brusven	Christina	cbrusven@fredlaw.com	Fredrikson Byron
Buchanan	Scott	ScottBuchanan@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa
Buck	Shelley	shelley.buck@piic.org	Prairie Island Indian Community
Budreau	Robert	robert.budreau@llojibwe.net	Leech Lake Band of Ojibwe
CAO	PUC	consumer.puc@state.mn.us	Public Utilities Commission
Canaday	James	james.canaday@ag.state.mn.us	Office of the Attorney General-RUD
Chavers	Cathy	cchavers@boisforte-nsn.gov	Bois Forte Band of Chippewa
Childs, Jr.	Michael	michael.childsjr@piic.org	Prairie Island Indian Community
Chilson	Cody	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transn
Choquette	Ray	rchoquette@agp.com	Ag Processing Inc.
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