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October 23, 2015

**VIA EFILING**

The Honorable Judge Jeanne Cochran  
Minnesota Office of Administrative Hearings  
P.O. Box 64620  
St. Paul, MN 55164-0620

**Re: Public Hearing Comments**  
***In the Matter of the Application of Minnesota Power for a Route Permit for the***  
***16 Line Reroute Project in St. Louis County***  
**PUC Docket No. E015/TL-14-977**  
**OAH Docket No. 68-2500-32500**

Dear Judge Cochran:

Minnesota Power respectfully submits these public hearing comments regarding Minnesota Power's 3.0-mile 16 Line Reroute Project in St. Louis County, Minnesota ("Project"). These comments are provided to ensure a fully developed and clear record for the Project.

**Conductor**

In its Application for a Route Permit for the Project ("Application"), Minnesota Power included calculations for electric and magnetic fields. These calculations were based on the conductor that Minnesota Power intends to use for the Project. In the Application, Minnesota Power did not explicitly identify that conductor, although the technical operational capabilities were identified. For the Project, Minnesota Power intends to use 336.4 kcmil aluminum conductor steel reinforced conductor.

**Land Rights for Existing 16 Line to be Removed**

The portion of the 16 Line that was identified for removal in Minnesota Power's Application for the Project will allow United Taconite to expand its tailings basin for needs identified at this time and in the future. The 16 Line in its current location in Section 17, Township 56 North, Range 17 West is there by license agreement with United Taconite executed in 1997. That license agreement requires Minnesota Power to remove the transmission line from this portion of real property within two years of receipt of written notice from United Taconite. The license specifically provides that only if the notice for removal is provided prior to October 1, 2006 is United Taconite required to pay the cost of relocation. That license agreement was executed in response to a request, by the mine owner at the time, to relocate the 16 Line to its current location. At that time, the mine owner paid 50 percent of the relocation and executed the previously-discussed license agreement.

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The existing 16 Line location in Sections 20 and 29, Township 56 North, Range 17 West is located by permissions granted through easements, condemnations, and State licenses dating back to 1937.

Conclusion

Minnesota Power appreciates the opportunity to submit comments during the public hearing comment period to ensure a clear and fully developed record regarding the Project.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel McCartney", with a stylized flourish at the end.

Daniel McCartney  
Siting and Permitting

cc: Service List

IN THE MATTER OF MINNESOTA POWER'S  
16 LINE REROUTE PROJECT – ST. LOUIS  
COUNTY, MINNESOTA

MPUC DOCKET No. E015/TL-14-977  
OAH DOCKET No. 68-2500-32500

**CERTIFICATE OF SERVICE**

Theresa Senart certifies that on the 23rd day of October, 2015, she filed a true and correct copy of **Minnesota Power's Public Hearing Comments** by posting the same on eDockets ([www.edockets.state.mn.us](http://www.edockets.state.mn.us)). Said document is also served via U.S. Mail or email as designated on the attached Service List and Project Contact List on file with the Minnesota Public Utilities Commission in the above referenced docket.

*/s/ Theresa Senart*  
\_\_\_\_\_  
Theresa Senart

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