

November 3, 2016

Daniel P. Wolf, Executive Secretary
Minnesota Public Utilities Commission
127 7th Place East, Suite 350
St. Paul, MN 55101-2147

**Re: EERA Comment and Recommendation
GNTL Minor Alteration Request**
Minnesota Power Great Northern Transmission Line Project
Docket No. E015/TL-14-21

Dear Mr. Wolf:

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

In the Matter of Minnesota Power's Request for a Minor Alteration of the Permitted Route for the Great Northern Transmission Line Project in Koochiching County

EERA staff herein provides its Comments and Recommendation on Minnesota Power's GNTL route permit request for minor alteration within the North Black River Variation Area.

EERA staff is available to answer any questions the Commission may have.

Sincerely,

William Cole Storm, Environmental Review Manager
Energy Environmental Review and Analysis
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BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

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

DOCKET No. E015/TL-14-21

DateNovember 3, 2016
EERA Staff: William Cole Storm.....(651) 539-1844

In the Matter of Minnesota Power’s Request for a Minor Alteration of the Permitted Route for the Great Northern Transmission Line Project in Koochiching County

Issues Addressed:

- Does the request meet the definition of a minor alteration under Minnesota Rule 7850.4800?
- Should the Commission approve the minor alteration request?
- If the minor alteration is approved, should any conditions be required?

Attachments: None

Additional documents and information can be found on <http://mn.gov/commerce/energyfacilities/Docket.html?Id=33847> or on eDockets <http://www.edockets.state.mn.us/EFilin/search.jsp> (14-21).

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

Introduction and Background

On April 11, 2016, the Minnesota Public Utilities Commission issued a high-voltage transmission line route permit for the Great Northern Transmission Line Project authorizing Minnesota Power to construct and operate an approximately 229-mile, 500-kilovolt transmission line and associated facilities in the Roseau, Lake of the Woods, Beltrami, Koochiching and Itasca counties.

Minnesota Power has requested a modification to an approximately 6.5-mile segment of the approved route near the North Black River in Koochiching County in order to address environmental concerns (lowland old growth conifer forest) raised by the Minnesota Department of Natural Resources. Minnesota Power asserted that the request is reasonable and that approval is appropriate because the proposed alteration

has impacts comparable to the impacts associated with the initially approved route and anticipated alignment and, therefore, does not result in significant change in the human or environmental impact of the facility.

Under Minnesota Rule 7850.4800, a minor alteration is defined as 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. At the close of the comment period, the Commission will decide whether the requested alteration is a minor alteration, whether to authorize the minor alteration, and determine whether additional conditions are appropriate.

Description - Minor Alteration

The minor alteration request involves a portion of the HVTL route within the North Black River Variation Area.¹ There were two route alternatives studied within the EIS for the North Black River Variation Area: the Proposed Blue Route and the North Black River Variation. The Proposed Blue Route and North Black River Variation have a common start point located just west of Town Road 118 (northern portion of the North Black River Variation Area) and a common end point located north of the intersection of Sandsmark Trail and CSAH 32 (southern portion of the North Black River Variation Area).

The North Black River Variation was developed to avoid a local non-ferrous mineral resource and to promote corridor sharing with the existing 230 kV transmission line that passes through this variation area.² The proposed Blue Route through the North Black River Variation Area was selected by the Commission in its final route permit decision due to the presence of residences within close proximity to the existing 230 kV HVTL in the northern portions of the North Black River Variation Area.

The requested minor alteration would modify the approved alignment at T159N R27W Sec. 34 NW ¼ by deviating to the east for approximately ¾ of a mile to the existing 230 kV corridor (and the former North Black River alternative route), and then parallels the existing 230 kV HVTL south to the common end point of the variation area. Since the minor alteration request occurs in the southern portion of the North Black River Variation Area, it avoids the conflict with the residences that are in close proximity to the existing 230 kV HVTL in the northern portion of this variation area.

¹ Final Environmental Impact Statement, Chapter 4.3.2.4 and Map 4-11

² Id.

Regulatory Process

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 (Minn. Rule 7850.4800). Minnesota Rule 7850.4800 outlines the application, review, and public notice procedures to be used in seeking minor alteration authorization.

Minnesota Power filed a request with the Commission for minor alteration authorization for the project on October 17, 2016. On October 20, 2016, Commission staff issued a notice of application for a minor alteration and associated comment period. Comments were sought on whether the proposed project is a minor alteration, and any conditions that may be appropriate should the project be authorized as a minor alteration. The comment period closes on November 3, 2016.

The Commission may authorize the minor alteration or determine that the alteration is not minor and requires a full permitting decision (Minn. Rule 7850.4800, Subp. 3). The Commission may authorize the minor alteration but impose reasonable conditions on the approval (Minn. Rule 7850.4800, Subp. 3).

EERA Staff Analysis and Comments

Minor Alteration

Minnesota Power's request for minor alteration authorization has been reviewed by EERA staff. The request, along with data from the FEIS on the North Black River Variation, provides adequate information for staff to evaluate the requested minor alteration.

Table 1 presents a comparison of selected features between the permitted alignment and the alignment of the minor alteration.

EERA staff concludes that the project is eligible for authorization as a minor alteration.

EERA staff concludes that the proposed project would not result in significant changes in the human or environmental impacts over that identified for Minnesota Power's permitted route through this variation area.

EERA staff believes it would be appropriate to apply those conditions identified within the original HVTL route permit to the alignment contained within the requested minor alteration.

Table 1. Comparison: Permitted Alignment and Minor Alteration Alignment

Selected Feature	Units	PUC Approved Alignment (April 2016)	Minor Alteration Alignment (September 2016)
Length of Transmission Line	Miles	6.35	6.87
Length that is in or Parallel to Existing Right-of-Way	Miles	0.05	4.63
Number of Roads Crossed	Number	1	1
Number of Parcels Crossed	Number	34	31
Number of Residences Within Right-of-Way	Number	0	0
Number of Non-Residential Buildings Within the Right-of-Way	Number	0	0
Area of Agricultural Land Within the Right-of-Way	Acres	0	0
Area of Forested Land Within the Right-of-Way	Acres	1.06	1.13
Area of Mineral or Metal Mining Resources within Right-of-Way	Acres	0	1
Area of Wetlands Within the Right-of-Way	Acres	153.33	165.39
Freshwater Emergent Wetland	Acres	1.21	2.4
Freshwater Forested/Shrub Wetland	Acres	151.34	162.34
Freshwater Pond	Acres	0.59	0.52
Riverine	Acres	0.19	0.13
Area of Grassland Within the Right-of-Way	Acres	0	0
Area of Developed Land Crossed	Acres	0.23	0.19
Transmission Line Distance Across a Lake, Stream, Drainage, or other Waterway	Feet	194.25	150.23
Area of DNR-owned Land	Acres	135.34	148.25
Area of Private Land	Acres	18.09	17.97
Area of Parks, Waterfowl Production Areas, and Wildlife Management Areas within the Right-of-Way	Acres	0	0
Number and Count of Known Protected or Endangered Species Within the Right-of-Way*	Number of Species	1 species, 2 found	Unknown
Number of Archaeological Resources Within the Right-of-Way	Number	-	-
Peatland Watershed Protection Area	Miles	3.55	3.75

EERA Staff Recommendation

Commission Decision Options

- A. Authorize the minor alteration request for the GNTL within the North Black River Variation Area.
- B. Authorize the minor alteration request for the Freeborn to Hayward 161 kV transmission line rebuild with conditions A, B, and C noted above.
- C. Determine that the alteration is not minor and requires a full permitting process.
- D. Make some other decision deemed more appropriate.

DOC EERA Staff Recommendation: Option A.

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
Comments and Recommendations**

Docket No. E015/TL-14-21

Dated this 3rd day of November 2016

/s/Sharon Ferguson

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