

June 6, 2014

Dr. Burl Haar Minnesota Public Utilities Commission 121 Seventh Place East Suite 350 St. Paul MN 55101-2147

Re: Request to Expand Route Width to Accommodate Potential Woad Hill Substation Designs

In the Matter of the Route Permit Application for the Odell Wind Farm HVTL Project in Cottonwood, Jackson, and Martin Counties
MPUC Docket No. IP6914/TL-13-591

Dear Dr. Haar:

Odell Wind Farm, LLC ("Odell") is providing supplemental information regarding potential designs of the proposed Woad Hill Substation and requests a change to the route width previously requested by Odell in its Route Permit Application filed on December 12, 2013 in the above-mentioned Docket. The change in route width is being requested to accommodate a potential new substation configuration being considered in response to new design information provided to Odell by Xcel Energy.

Odell originally proposed to construct the proposed Woad Hill Substation directly adjacent to Northern States Power Company's d/b/a Xcel Energy ("Xcel Energy") planned switchyard in the southeast quarter of the intersection of County Road 150 (230th Street) and 30th Avenue in Section 16, Township 104, Range 33, Martin County, Minnesota (the "Original Configuration"). A preliminary engineering design of the Original Configuration is provided in the attached Exhibit 1. In the Original Configuration the Woad Hill Substation and Xcel Energy switchyard would be located north of the existing Xcel Energy 345 kilovolt ("kV") electrical transmission line to which the Odell electrical transmission line would interconnect. A variation on the Original Configuration would co-locate the Woad Hill Substation and the Xcel Energy switchyard south of the existing Xcel Energy 345 kV electrical transmission line to which the Odell electrical transmission line would interconnect ("Second Configuration"). A preliminary engineering design of the Second Configuration is provided in the attached Exhibit 2. Odell designed the Original Configuration and Second Configuration using National Electric Safety Code (NESC) as well as other standards publicly available.

As a result of detailed discussions with Xcel Energy on the design of Woad Hill Substation, it was determined that the placement of the Woad Hill Substation in the Original Configuration or the Second Configuration may not be practicable due to Xcel Energy's internal design spacing 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 quarter of the intersection of County Road 150 (230th Street) and 30th Avenue in Section 16, Township 104, Range 33, Martin County, Minnesota (the "Third Configuration"). A preliminary engineering design of the Third Configuration is provided in the attached Exhibit 3. In the Third Configuration the Woad Hill Substation would be located northwest of the intersection of County Road 150 and 30th Avenue and the Xcel Energy switchyard would be located southeast of the same intersection. The Woad Hill Substation and the Xcel Energy switchyard would be connected by a new 345 kV electrical transmission line that would be less than 1,500 feet long and would be permitted by Martin County.

Odell continues to coordinate with Xcel Energy to determine whether the Original Configuration, Second Configuration, Third Configuration or some other combination thereof will be the configuration that best suits the needs of Xcel Energy and the Odell transmission line project. However, the timing of determining the best configuration is unknown at this time due to Xcel Energy's design schedule. In order to ensure the impacts of the potential designs are fully developed in the record, Odell is requesting that route be widened to include sufficient area to encompass the land that may be necessary to accommodate the Original, Second, or Third Configurations (see attached Exhibit 4). Since the originally proposed route includes enough room to accommodate the Original Configuration, the Second Configuration, and part of the Third Configuration, Odell is requesting that the proposed route width be modified only slightly to widen the area included in the northwest quadrant of the intersection of County Road 150 (230th Street) and 30th Avenue. The additional route area is approximately 480 feet wide by 950 feet long.

Similar to the route area for the Original Configuration and the Second Configuration, the new route area for the Third Configuration is also in agricultural fields and

- is not expected to create any new wetland impacts;
- is not expected to impact native prairie;
- is not expected to impact Minnesota County Biological Survey Sites; and
- is not expected to require additional tree clearing;

Moreover, Odell has contacted a landowner located at 206 230th Street, Trimont, MN 56176, that lives directly adjacent to the area that would be occupied by the Original Configuration and the Third Configuration about the three configurations described in this letter and has not received any negative comments or concerns. Odell has sufficient land rights to accommodate any of the three configurations. In addition, Martin County and Cedar Township have also been contacted about the Third Configuration and, as of the date of this letter, neither has expressed concern about any of the three configurations.

Thus, Odell respectfully requests the original route width be widened for the Third Configuration of the Woad Hill Substation as depicted in Exhibit 4. To ensure full development of the record, Odell requests that the Department of Commerce Energy Environmental Review Analysis unit consider the additional area and the three configurations described in this letter in its environmental assessment of the proposed route.

Please contact me with any questions about the proposed configurations or the additional route area.

Sincerely,

Patrick Smith

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Dir. of Environmental Planning

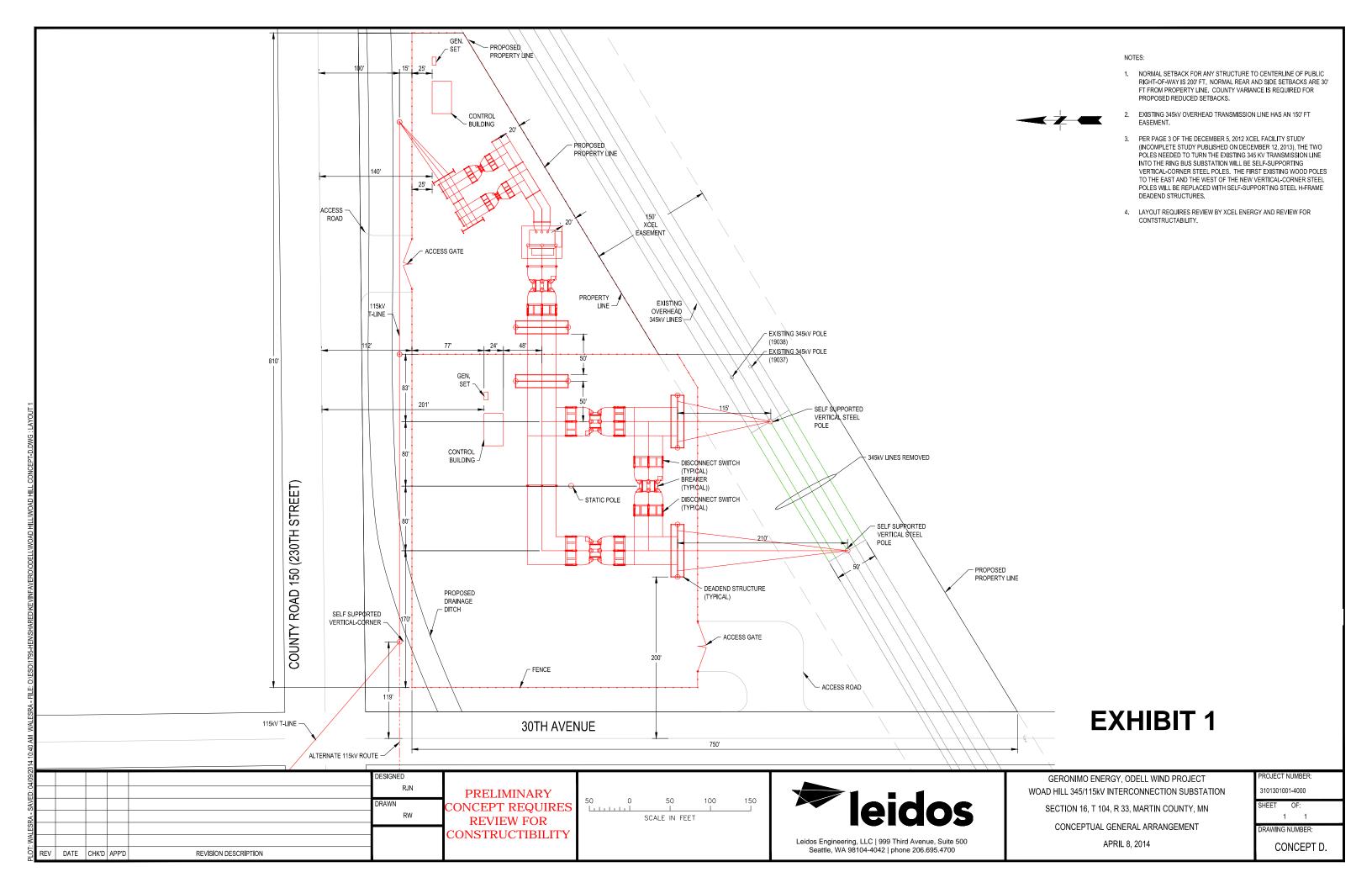
952.988.9000

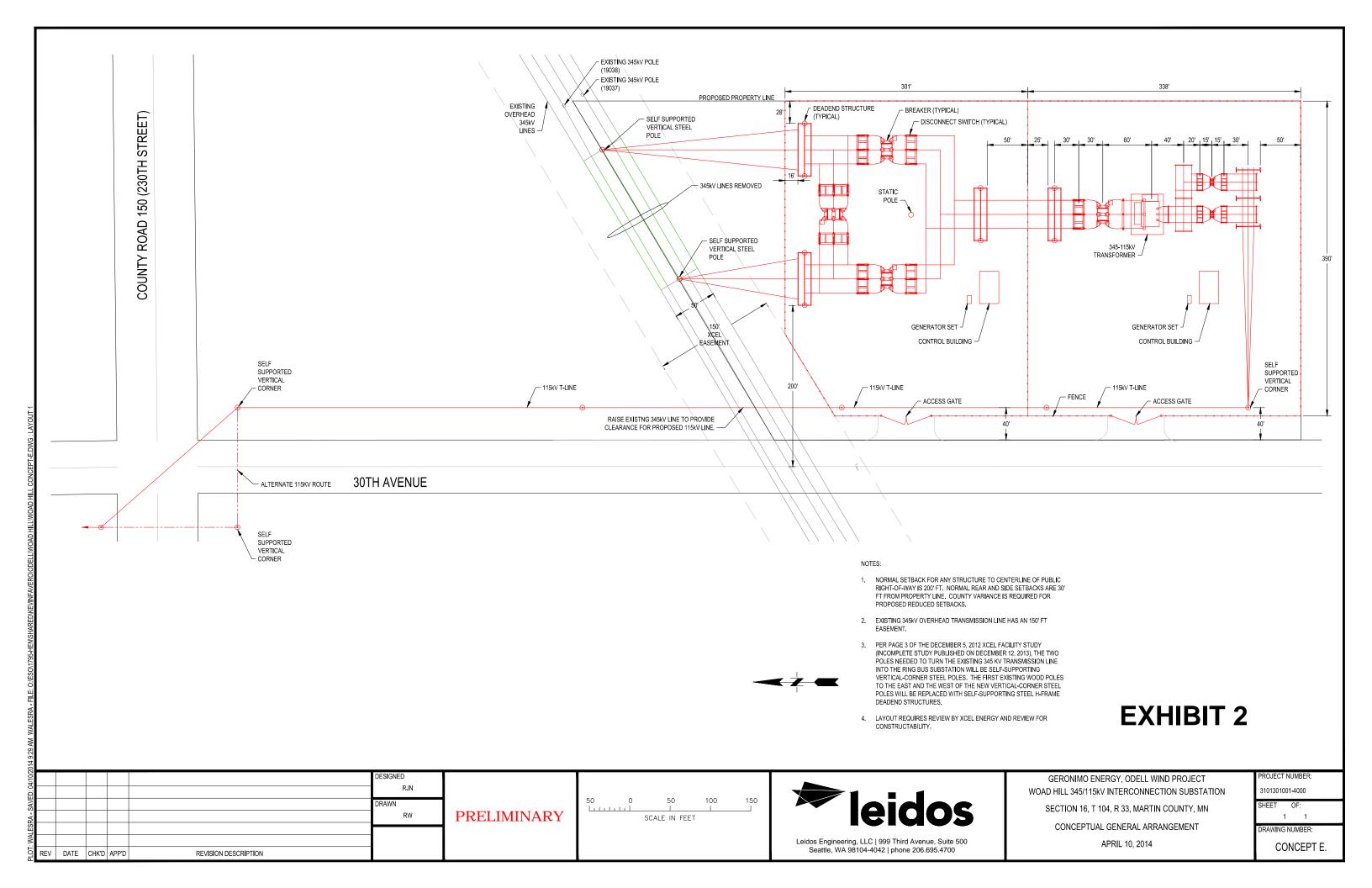
patrick@geronimowind.com

c: Ms. Deborah Pile

Mr. Richard Davis

Service List





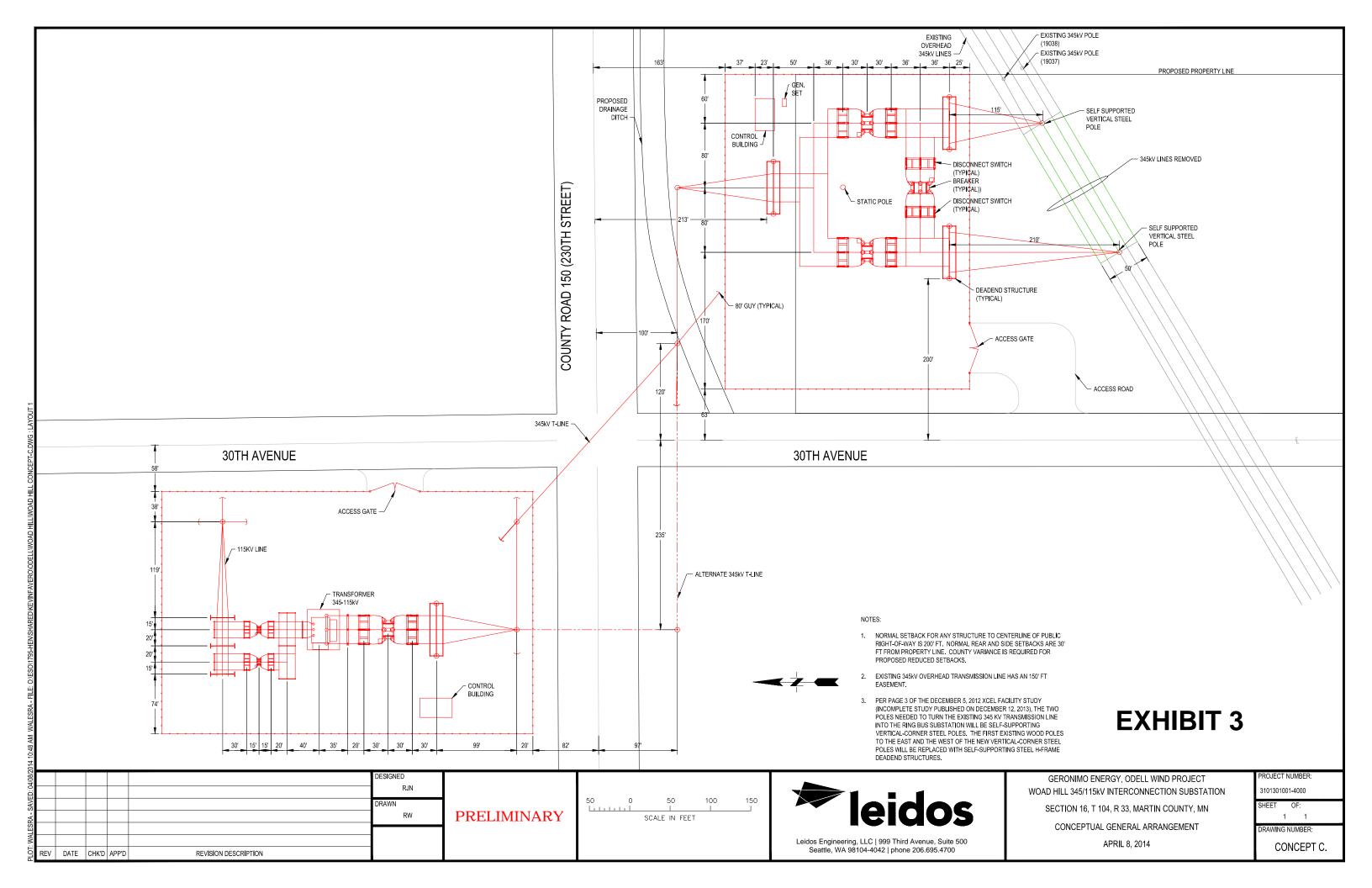
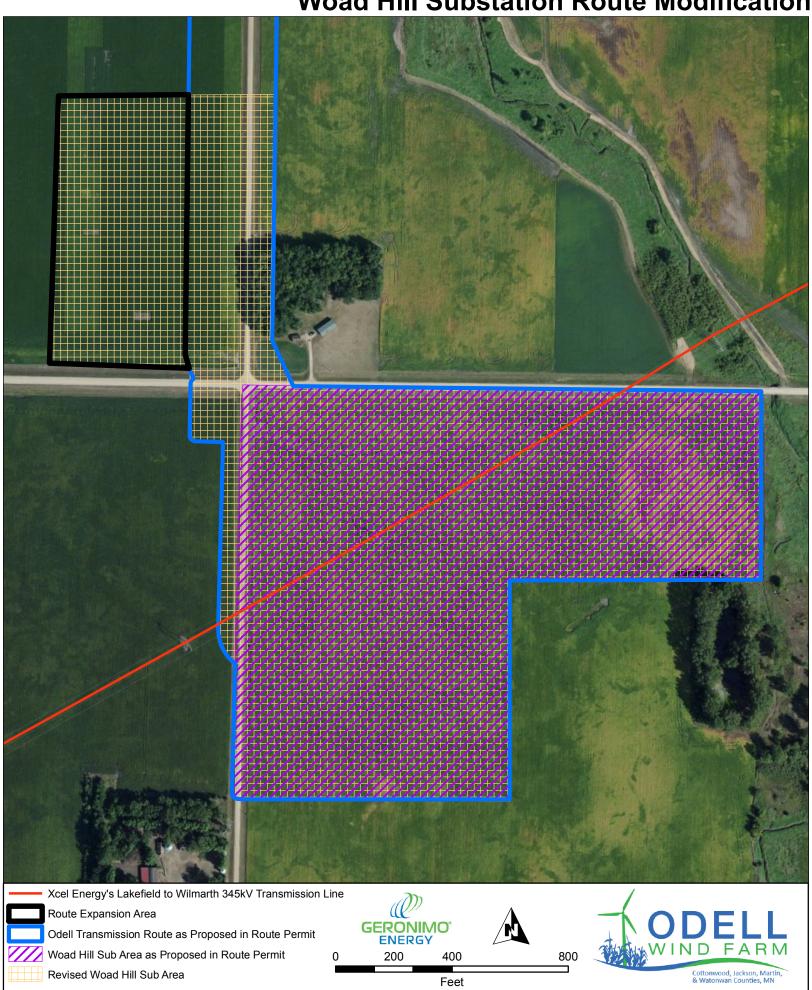


Exhibit 4
Woad Hill Substation Route Modification



AFFIDAVIT OF SERVICE

| In the Matter of Odell Wind Farm LLC's Route Permit Application for a 115 kV Transmission Line and Associated Facilities in Cottonwood, Jackson, and Martin Counties |
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| MPUC Docket No. IP6914/TL-13-591 |
| STATE OF MINNESOTA)) ss. COUNTY OF HENNEPIN) |
| Karen F. Brewer, of Minneapolis, Hennepin County, in the State of Minnesota, being duly sworn, says that on the 6 th day of June, 2014, she e-filed with the Minnesota Public Utilities Commission the following: |
| 1. Change to Previously-filed Route in Route Permit Application; and, |
| 2. Affidavit of Service. |
| A copy has also been served in accordance with the attached service list of record. |
| Karen F. Brewer |
| |
| Subscribed and sworn to before me this 6^{th} day of June, 2014. |
| (SEAL) Notary Public, Hennepin County, Minnesota My Commission Expires |
| |



50712788_1.DOC

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|----------------|-----------------------------------|---------------------------------------|---|----------------------------|-------------------|---|
| Julia | Anderson | Julia.Anderson@ag.state.m n.us | Office of the Attorney General-DOC | 1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134 | Electronic Service | Yes | OFF_SL_13-591_Official CC Service List |
| Christina | Brusven | cbrusven@fredlaw.com | Fredrikson & Byron, P.A. | 200 S 6th St Ste 4000 Minneapolis, MN 554021425 | Electronic Service | No | OFF_SL_13-591_Official CC Service List |
| Jeremy | Duehr | jduehr@fredlaw.com | Fredrikson & Byron, P.A. | 200 South Sixth Street Suite 4000 Minneapolis, Minnesota 55402-1125 | Electronic Service | No | OFF_SL_13-591_Official CC Service List |
| Sharon | Ferguson | sharon.ferguson@state.mn .us | Department of Commerce | 85 7th Place E Ste 500 Saint Paul, MN 551012198 | Electronic Service | No | OFF_SL_13-591_Official CC Service List |
| Burl W. | Haar | burl.haar@state.mn.us | Public Utilities Commission | Suite 350 121 7th Place East St. Paul, MN 551012147 | Electronic Service | Yes | OFF_SL_13-591_Official CC Service List |
| Michael | Kaluzniak | mike.kaluzniak@state.mn.u s | Public Utilities Commission | Suite 350 121 Seventh Place Ea St. Paul, MN 55101 | Electronic Service st | Yes | OFF_SL_13-591_Official CC Service List |
| John | Lindell | agorud.ecf@ag.state.mn.us | Office of the Attorney General-RUD | 1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130 | Electronic Service | Yes | OFF_SL_13-591_Official CC Service List |
| Steve | Mihalchick | steve.mihalchick@state.mn .us | Office of Administrative Hearings | PO Box 64620 St. Paul, MN 551640620 | Electronic Service | Yes | OFF_SL_13-591_Official CC Service List |
| Janet | Shaddix Elling | jshaddix@janetshaddix.co m | Shaddix And Associates | Ste 122 9100 W Bloomington Bloomington, MN 55431 | Electronic Service Frwy | Yes | OFF_SL_13-591_Official CC Service List |
| Patrick | Smith | patrick@geronimowind.co m | Geronimo Wind Energy, LLC | 7650 Edinborough Way, Ste 725 Edina, MN 55435 | Electronic Service | No | OFF_SL_13-591_Official CC Service List |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|----------------------------|---|---|--------------------|-------------------|--|
| Jonathan | Adrian | jnbadrian@frontiernet.net | | 39045 Co Rd 1 Mountain Lake, MN 56159 | Electronic Service | No | SPL_SL_13-591_Geronimo Odell TL Project Contact List |
| Aaron | Backman | abackman@windom- mn.com | EDA of Windom | 444 9th St, PO Box 38 Windom, MN 56101 | Electronic Service | No | SPL_SL_13-591_Geronimo Odell TL Project Contact List |
| Annette | Blair | N/A | Southwest Regional Development Commission | 2401 Broadway Ave #1 Slayton, MN 56172-1142 | Paper Service | No | SPL_SL_13-591_Geronimo Odell TL Project Contact List |
| Larry | Boots | larrywb@frontiernet.net | | 1967 Willow Ave Worthington, MN 56187 | Electronic Service | No | SPL_SL_13-591_Geronimo Odell TL Project Contact List |
| Wayne | Hanson | whanson@frontiernet.net | - | 66224 361 Lane Butterfield, MN 56120 | Electronic Service | No | SPL_SL_13-591_Geronimo Odell TL Project Contact List |
| James | Swanson | | | 91868 570th Avenue Mountain Lake, MN 56159 | Paper Service | No | SPL_SL_13-591_Geronimo Odell TL Project Contact List |