

**Minnesota Public Utilities Commission**  
*Staff Briefing Papers*

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Meeting Date: May 19, 2016 .....Agenda Item \*3

Company: Great River Energy

Docket No. ET2, E015/TL-14-797

In the Matter of the Application of Great River Energy and Minnesota Power  
for a Route Permit for the Menahga Area 115 kV Transmission Line Project in  
Hubbard, Wadena, and Becker Counties, Minnesota– Request for Minor  
Alteration

Issues:                   ▪   Should the Commission authorize the minor alteration request?  
                              ▪   If the minor alteration is approved, should any conditions be required?

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**Relevant Documents**

Order Issuing Route Permit .....March 14, 2016  
Great River Energy Application for a Minor Alteration..... March 31, 2016  
Department of Commerce Comments and Recommendations ..... April 26, 2016

**Attachments**

Exhibits A, B, C – Maps identifying minor alteration requests

The attached materials are work papers of the Commission staff. They are intended for use by the Minnesota Public Utilities Commission and are based upon information already in the record unless noted otherwise.

## **I. STATEMENT OF THE ISSUES**

- Should the Commission authorize the minor alteration request?
- If the minor alteration is approved, should any conditions be required?

## **II. PROJECT OVERVIEW**

The current permitted project consists of 22.5 miles of new 115 kV high voltage transmission line from the existing Hubbard substation in Hubbard Township westward to a new Straight River substation in the SE ¼ of SW ¼ of Straight River Township, then southward to a new Blueberry substation near the city of Menahga and to a new Red Eye substation approximately 3 miles north of Sebeka, MN. The transmission line project also includes construction of three transmission substations, relocation of an existing distribution substation, and modifications of two existing substations to accommodate the new transmission line.

## **III. PROCEDURAL HISTORY**

On March 14, 2016, the Commission issued a route permit to Great River Energy and Minnesota Power (the Applicants) to construct and operate a new 115 kV transmission line in Hubbard, Wadena, and Becker counties (the Menahga Area Project).

On March 31, 2016, Great River Energy filed an application requesting approval of two route modifications in the Blueberry substation to Red Eye substation segment of the project, which is a part of the project under the ownership of Great River Energy.

On April 12, 2016, the Commission issued a notice soliciting comments on the minor alteration requests by April 26, 2016.

On April 26, 2016, the Department of Commerce Energy Environmental Review and Analysis (EERA) filed comments and recommendations on the minor alteration application.

## **IV. STATUTES AND RULES**

Under Minn. R. 7850.4800, no person may make a minor alteration to a large electric power generating plant or high-voltage transmission line without approval from the Commission. 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. A permittee requesting a minor alteration must submit an application to the Commission describing the alteration to be made and an explanation why the alternation is minor. Upon receiving a minor alteration request the Commission is required to provide at least a 10-day period for interested persons to submit comments on the request. After close of the

the comment period, the Commission must decide whether to authorize the minor alteration and impose reasonable conditions, as necessary, or determine that the alteration is not minor and requires a full permitting decision.

## V. MINOR ALTERATION REQUEST

On March 31, 2016, Great River Energy applied to the Commission for two minor alterations to the approved transmission line route. The minor alterations require approval for two route/segment modifications to the Permitted Route in the Blueberry Substation to Red Eye Substation segment in Wadena County to address landowners concerns as shown in **Exhibit A**.

**Minor Alteration 1:** Reroute the transmission line segment between the points where it joins the pipeline corridor and intersection of 350th St. with 119th Ave to instead follow the existing 34.5 kV corridor east to 119th Ave and then run south following the 119th Ave until it meets with the permitted route starting at 350th St and 119th Ave as shown in **Exhibit B**.

GRE indicated this alteration is the result of an affected landowner who indicated the line as currently proposed will impact a pond along the pipeline corridor and it will also impact his business and home along 350<sup>th</sup> Street, even if the transmission line were to be located on the opposite side of 350<sup>th</sup> Street. The affected landowner had offered that the transmission line be routed entirely on his property, but on a different part, namely on the north and east sides of his property. GRE reviewed the proposed relocation of the line and determined that it is constructible and reasonable.

**Minor Alteration 2:** Along the original 119th Avenue alignment between 350th Street and County State Aid Highway 13, the transmission line comes within approximately 275 feet of a home in Section 4, T137N, R35W. During the January 28, 2016 meeting in which the Commission approved the Certificate of Need and Route Permit, the Commission directed Great River Energy to work with this landowner on the alignment near his house to minimize impacts to his property. The landowner has requested that the alignment be modified as shown in **Exhibit C**.

GRE reviewed the proposed relocation of the line and determined that it is constructible and reasonable.

## VI. COMMENTS ON MINOR ALTERATION REQUEST

On April 12, 2016, the Commission issued a notice of comment period on the minor alteration application requesting comments by April 26, 2016. In addition to being electronically filed, the notice was also sent to all the landowners potentially affected by the proposed minor

alterations. The Commission received comments from the Department of Commerce Energy Environmental Review and Analysis (EERA) staff. These were the only comments received during the prescribed comment period.

#### **A. Department of Commerce**

On April 26, 2016, the EERA staff provided comments and analysis on GRE's minor alterations request. EERA staff explained that it had reviewed the information provided by GRE and evaluated whether the modifications would result in significant change to the human and environmental impact of the transmission line relative to the routing factors found in Minn. R. 7850.4100. Based on its review, EERA staff concluded that the "two proposed route modifications will not result in significant changes in the human or environmental impacts of the project and are eligible for authorization as a minor alteration".

In general, EERA staff found that there are two routing factors for which the relative impacts of the route modification are anticipated to be positive – (1) impacts on human settlements and (2) impacts on land-based economies. The route modification places the line at a greater distance from a residence. The route modification crosses relatively fewer agricultural acres. In addition, EERA identified two routing factors for which the relative impacts of the route modifications are anticipated to be negative: 1) Impacts on the natural environment; 2) The utilization of the existing infrastructure right-of-way (ROW).

For the route alteration 1, the modification impacts more forested wetlands (approx. 2.4 acres) than the permitted route and proceeds cross country and away from infrastructure ROW, but in doing so, it will impact relatively fewer agricultural acres (approx. 2.8 acres), thus minimizing the agricultural impacts. On whole, EERA found that route modification 1, though its impacts differ from the permitted route, it does not result in significant changes in the human or environmental impacts of the project.

For route alteration 2, EERA found that the potential impacts are similar to the impacts of the permitted route, and it presents two factors for which the relative impacts of the route modification are anticipated to be positive: 1) Impacts on human settlement, and 2) Impacts on land-based economies. The route modification places the line at a greater distance from a residence, moving the transmission line structures from within an agricultural field to a field boundary. In addition, EERA identified two routing factors for which the relative impacts are anticipated to be negative: 1) Impacts to the natural environment, and 2) The utilization of less existing infrastructure ROW than the permitted route. Similar with modification 1 conclusion, EERA concluded that route modification 2 does not result in significant changes in the human or environmental impacts of the project.

EERA staff recommended that the Commission approve GRE's minor alterations request.

## **VII. STAFF DISCUSSION**

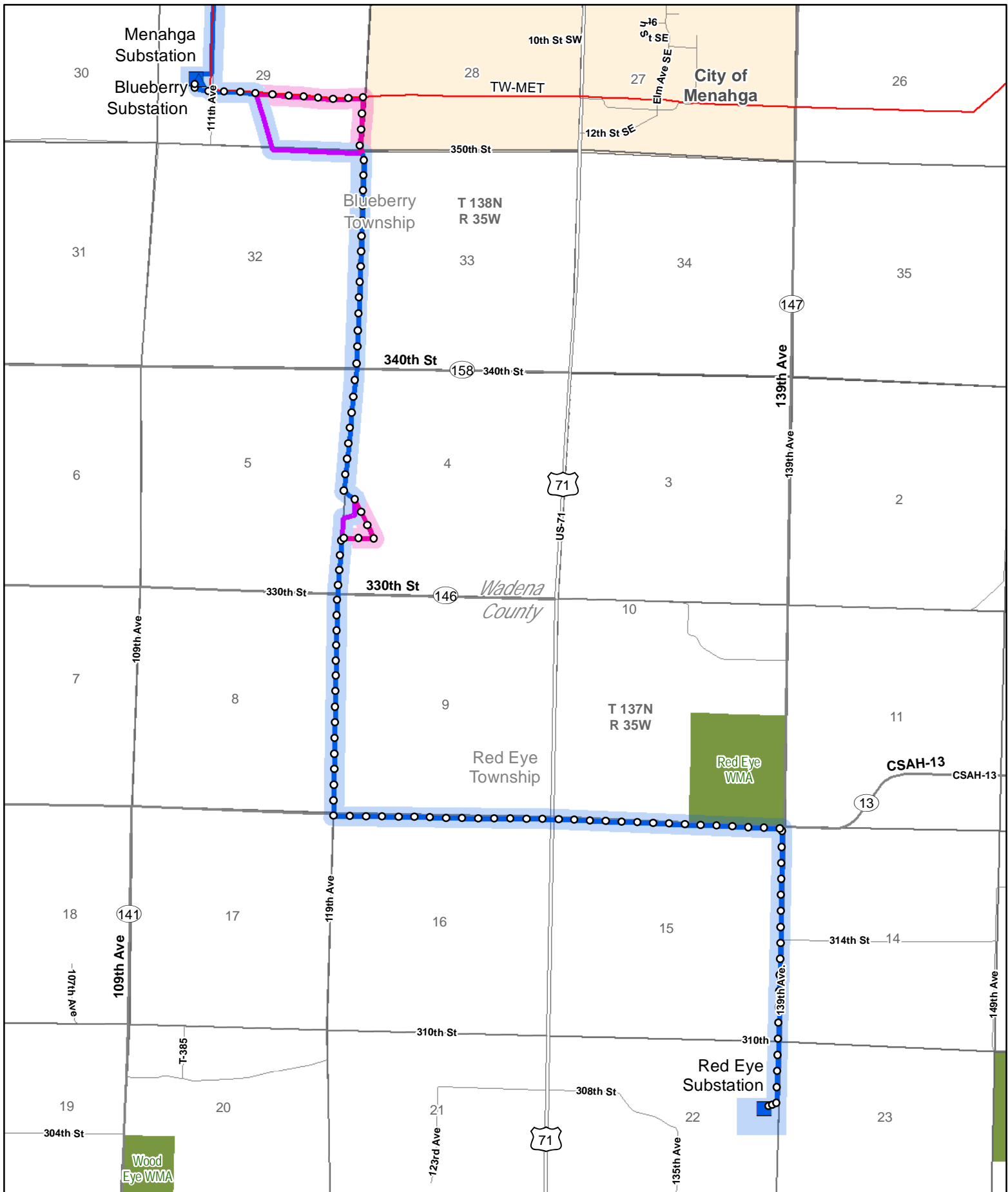
Staff has reviewed the application for a minor alteration and agrees with the EERA staff that the requested alterations are minor and do not significantly change the human or environmental impact of the project. The existing route permit includes conditions to ensure the transmission line is built in a safe and reliable manner, and that impacts are minimized or mitigated. In addition, the minor alterations are made at the request of landowners and all of those potentially affected landowners are in agreement with the alterations. Therefore, staff recommends that the Commission approve GRE's minor alterations request with no additional conditions.

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## **COMMISSION DECISION ALTERNATIVES**

- A. Authorize the minor alterations request without conditions.
- B. Authorize the minor alteration request with additional conditions.
- C. Determine that the requested alteration is not minor and require a full permitting decision.
- D. Take some other action deemed appropriate.

**Staff Recommendation:** A



#### Great River Energy

- Anticipated alignment 115 kV transmission line
- Original alignment
- Proposed minor alteration alignment
- Structure location
- ▲ Proposed transmission substation

#### Todd-Wadena

- Permitted route (500 feet)
  - Alteration route (500 feet)
  - Proposed distribution substation
- GIS Data sources include:  
MNGEO, MNDNR, MNDOT, and Great River Energy.  
Aerial Imagery from ESRI web service

0 500 Feet

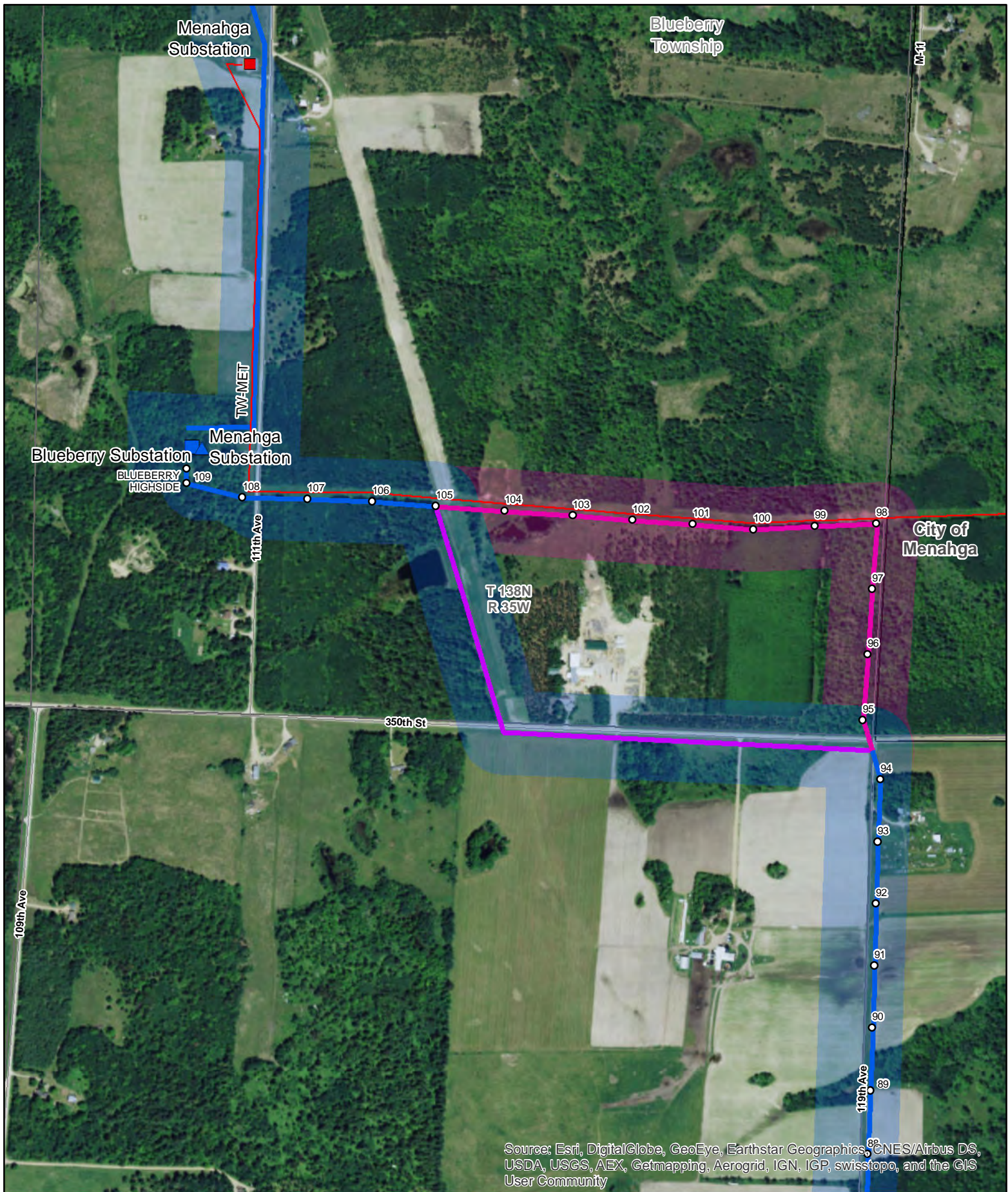


Updated: 3/25/2016



## Menahga Area 115 kV Project Route Permit Minor Alterations Exhibit A





Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

#### Great River Energy

- Anticipated alignment 115 kV transmission line
- Original alignment
- Proposed minor alteration alignment
- Structure location
- ▲ Proposed transmission substation

#### Todd-Wadena

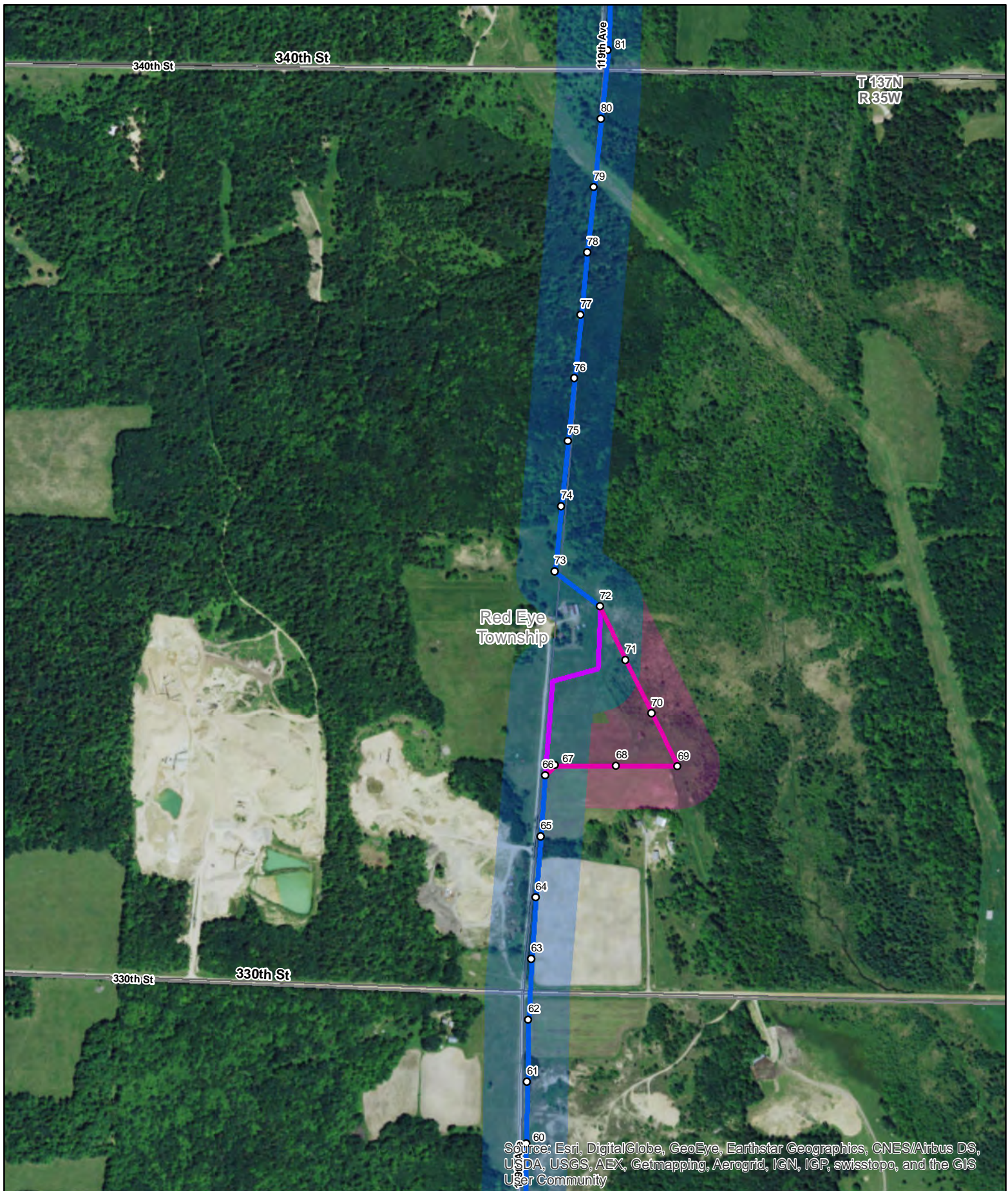
- Permitted route (500 feet)
  - Alteration route (500 feet)
  - Proposed distribution substation
- GIS Data sources include:  
MNGEO, MNDNR, MNDOT, and Great River Energy.  
Aerial Imagery from ESRI web service

0 500 Feet

Updated: 3/25/2016

### Menahga Area 115 kV Project Route Permit Minor Alterations Exhibit B



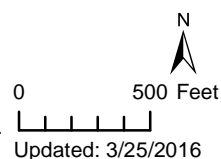


#### Great River Energy

- Anticipated alignment 115 kV transmission line
- Original alignment
- Proposed minor alteration alignment
- Structure location

- Permitted route (500 feet)
- Alteration route (500 feet)

GIS Data sources include:  
MNGEO, MNDNR, MNDOT, and Great River Energy.  
Aerial Imagery from ESRI web service



### Menahga Area 115 kV Project Route Permit Minor Alterations Exhibit C