

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

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Meeting Date: August 11, 2016.....Agenda Item \*1

Company: ITC Midwest LLC

Docket No. ET-6675/TL-12-1337

In the Matter of the Application of ITC Midwest LLC for a Route Permit for  
the Minnesota – Iowa 345 kV Transmission Line Project in Jackson, Martin,  
and Faribault Counties, Minnesota

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 .....November 25, 2014  
Application for a Minor Alteration ..... June 27, 2016  
Application for a Minor Alteration Supplement ..... June 30, 2016  
Department of Commerce Comments .....July 12, 2016  
Minnesota Department of Transportation Comments.....July 12, 2016

**Attachments**

Figure 1 – Map Identifying Minor Alteration Request

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 ISSUES**

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

## **II. STATUTES AND RULES**

Under Minn. R. 7850.4800, no person may make a minor alteration in 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 alteration is minor. Upon receiving a minor alteration application 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 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 require a full permitting decision.

## **III. MINOR ALTERATION REQUEST**

The Commission issued a route permit to ITC Midwest for the Minnesota-Iowa transmission line project on November 25, 2014. The Minnesota-Iowa transmission line project is a new 75-mile-long 345 kilovolt (kV) transmission line located in Jackson, Martin, and Faribault counties. Specifically, the transmission line begins at the existing Lakefield Substation near the city of Lakefield in Jackson County and extends through Martin County to a new Huntley substation near the city of Winnebago in Faribault County. From the new Huntley substation the transmission line proceeds south crossing the Minnesota-Iowa border near Elmore, Minnesota, and connects with a new Ledyard substation near Ledyard, Iowa. The transmission line project also includes expanding the existing Lakefield Junction substation, decommissioning the existing Winnebago substation, and reconfiguring several existing 69 kV and 161 kV transmission lines.

For construction purposes, the project has been divided into four segments:

- Segment 1 – Lakefield Junction substation to Fox Lake substation
- Segment 2 – Fox Lake substation to Rutland substation
- Segment 3 – Rutland substation to Winnebago/Huntley substation
- Segment 4 – Winnebago/Huntley substation to Iowa border

At this time, construction is underway for Segment 1 (structures 1 to 159) and Segment 2 (structure 159 to 242) of the project.

On June 27, 2016, ITC Midwest filed an application for a minor alteration to the permitted route.<sup>1</sup> The minor alteration being requested is associated with the existing Winnebago substation located in Segment 3 of the project. Specifically, ITC Midwest is requesting an expansion of the permitted route width around the Winnebago Junction Substation to accommodate: 1) the reconfiguration of existing transmission lines to allow for continued energization of the substation during construction of the project, and 2) the replacement of the first structures out of the substation north across U.S. Highway 169 to maintain appropriate design standards (Figure 1).

As indicated in the application and supplement, the additional route width being requested totals approximately 6.7 acres. The expanded route width would involve incremental impacts to agricultural land by 1.59 acres, forested land by 0.37 acres, and grassland by 1.6 acres; cross two additional parcels; and cross U.S. Highway 169. The additional impacts are a result of the right-of-way being routed around the existing substation rather than through the substation as originally designed. ITC Midwest indicated that all landowners from whom an easement would be necessary have agreed to the alteration.

#### **IV. COMMENTS ON MINOR ALTERATION REQUEST**

On June 28, 2016, the Commission issued a notice of comment period on the minor alteration application. In addition to being electronically filed, the notice was also sent to all the landowners potentially affected by the proposed minor alteration. Comments were accepted until July 12, 2016. The Commission received comments from the Department of Commerce Energy Environmental Review and Analysis (EERA) and the Minnesota Department of Transportation (MnDOT). These were the only comments received in this matter.

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

On July 12, 2016, EERA staff provided comments and recommendations on ITC Midwest's minor alteration request. EERA staff explained that it had reviewed the information provided by ITC Midwest and evaluated whether the modification would result in significant change to the human and environmental impact of the facility relative to the routing factors found in Minn. R. 7850.4100. Based on its review, EERA staff concluded that the potential impacts of the minor alteration are similar to the project as permitted, and do not result in significant changes in the

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<sup>1</sup> ITC Midwest filed a supplement to the minor alteration application on June 30, 2016. The supplement corrected errors identified in Table 1 of the original filing that related to the lengths of the single- and double-circuit lines. The supplement also provided the approximate acreage of additional land the alteration would require.

human or environmental impacts of the project. EERA staff recommended that the Commission grant ITC Midwest's requested minor alteration.

## **B. Minnesota Department of Transportation**

On July 12, 2016, MnDOT provided comments on ITC Midwest's minor alteration request. MnDOT did not oppose the minor alteration, but indicated that a permit would be required because the alteration involves the transmission line crossing U.S. Highway 169 and possibly occupying the highway right-of-way. MnDOT requested that the applicant coordinate with its District 7A Engineering Specialist concerning additional permit requirements for the crossing of the highway should the minor alteration be granted.

## **V. STAFF DISCUSSION**

Staff has reviewed the application for a minor alteration and agrees with the EERA staff that the requested alteration is minor and does not significantly change the human or environmental impact of the facility. The existing route permit includes conditions to ensure the transmission facility is constructed in a safe and reliable manner, and that impacts are minimized or mitigated. In addition, all potentially affected landowners are in agreement with the alteration. Therefore, staff recommends that the Commission approve ITC Midwest's minor alteration request. However, because the minor alteration will involve the crossing of U.S. Highway 169, staff also recommends that the minor alteration be conditioned on ITC Midwest coordinating with MnDOT on its permit requirements for the U.S. Highway 169 crossing.

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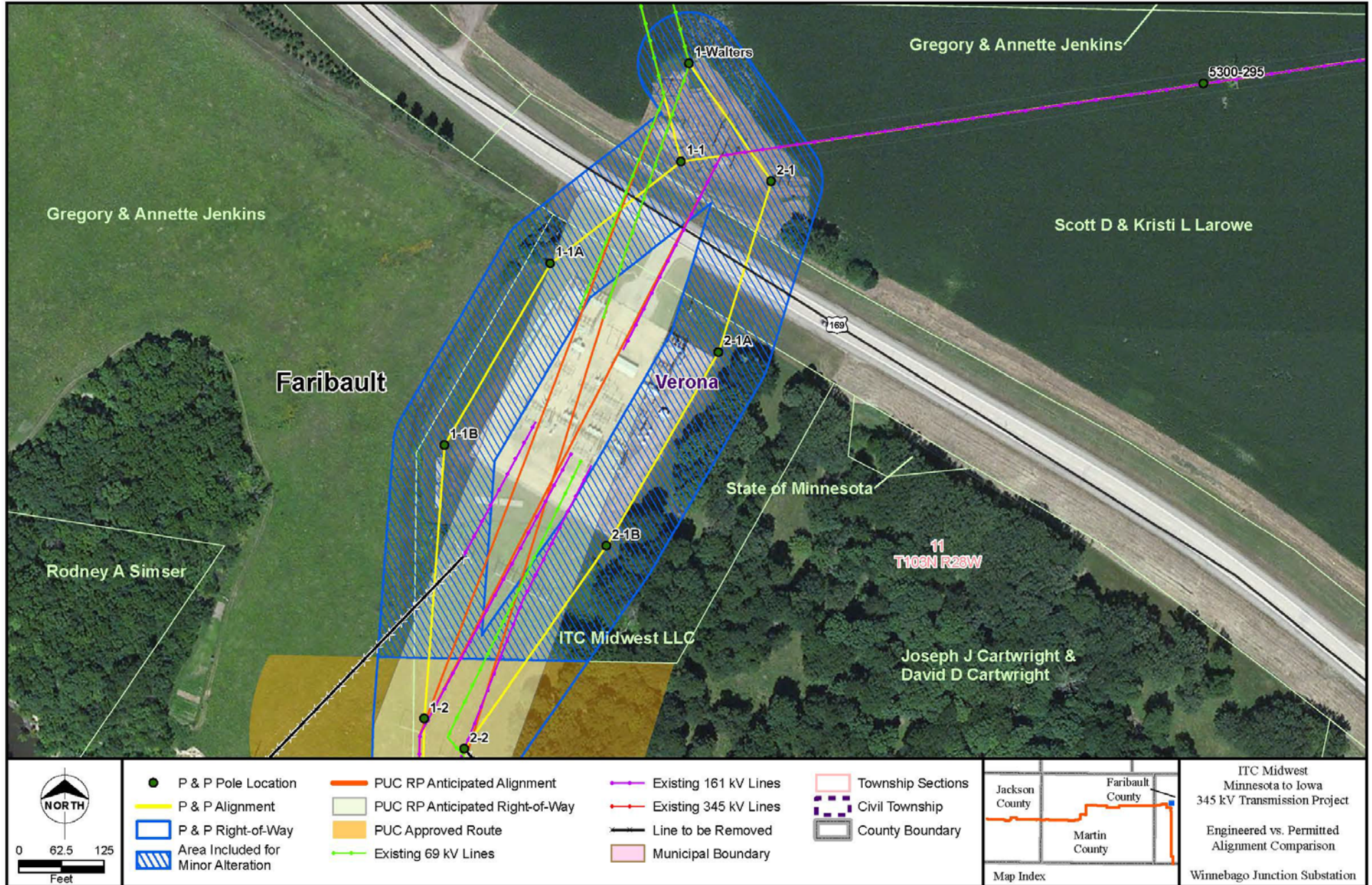
## **COMMISSION DECISION ALTERNATIVES**

- A. Authorize the minor alteration request without conditions.
- B. Authorize the minor alteration request conditioned upon ITC Midwest coordinating with the Minnesota Department of Transportation on permit requirements for the transmission facility crossing of U.S. Highway 169.
- C. Determine that the requested alteration is not minor and require a full permitting decision.
- D. Take some other action deemed appropriate.

**Staff Recommendation: B**



**Figure 1 – Map Identifying Minor Alteration Request**



Source: ITC Midwest, Application for a Minor Alteration (June 27, 2016), Document ID 20166-122672-01