

June 27, 2016

VIA ELECTRONIC FILING AND U.S. MAIL

Mr. Daniel P. Wolf Minnesota Public Utilities Commission 350 Metro Square Building 121 Seventh Place East St. Paul, MN 55101-2147

Request for Minor Alteration (Minnesota Rule 7850.4800) - Associated Facilities Re: Minnesota - Iowa 345 kV Transmission Project and Associated Facilities in Jackson, Martin, and Faribault Counties Docket No. ET6675/TL-12-1337

Dear Mr. Wolf,

On November 25, 2014, the Minnesota Public Utilities Commission ("Commission") issued a Route Permit for ITC Midwest LLC ("ITC Midwest") to construct the Minnesota - Iowa 345 kV Transmission Project and Associated Facilities in Jackson, Martin, and Faribault Counties ("Project"). On August 5, 2015, ITC Midwest filed its Plan and Profile for Segment 1, from the Lakefield Junction Substation to Structure 159. ITC Midwest filed its Plan and Profile for Segment 2 (from Structure 159 to 242) on April 29, 2016. ITC Midwest continues design work for Segment 3, Segment 4, and the Associated Facilities. ITC Midwest respectfully requests the Commission approve a minor alteration for the Associated Facilities around the Winnebago **Junction Substation.**

ITC Midwest requests this minor alteration to provide sufficient route width to accommodate configuration of the Associated Facilities in a way that would allow for the Winnebago Junction Substation to remain energized throughout construction. Additionally, during detailed design, ITC Midwest engineers identified the need to replace the first structures out of the Winnebago Junction Substation north across US Highway 169 to maintain appropriate design standards. This minor alteration is requested to accommodate alignments and rights-of-way for the Walters - Winnebago Junction 69 kV transmission line (built to 161 kV standards but operated at 69 kV) and the co-located 161 kV N.B.E.I. - Winnebago Junction/69 kV Winnebago Local - Winnebago Junction transmission line (built to 161 kV/161 kV standards but operated at 161 kV/69 kV).

All landowners from whom an easement would be necessary to accommodate these new alignments around the Winnebago Junction Substation have agreed to this alignment. A copy of Mr. Daniel P. Wolf June 27, 2016 Page 2

this filing has been provided to the landowners from whom easements to accommodate this change have been obtained.

Attachment 1 includes additional information on the requested minor alteration. **Attachment 2** illustrates the requested minor alteration and the route and alignment as identified in the Route Permit issued by the Commission.

As required by Attachment B to the Route Permit for the Project, in addition to this letter and enclosures being eFiled, ITC Midwest has mailed a paper copy and CD of this filing to the Executive Secretary of the Commission. Please contact me at dgrover@itctransco.com or 612.332.2511 if you have any questions regarding this filing.

Sincerely,

David B. Grover

Director, RTO Affairs (MISO)

David B. Hrover

Enclosures

cc: Service List

Landowner List (via US Mail)

Scott Ek, Minnesota Public Utilities Commission (via US Mail)

Ray Kirsch, Minnesota Department of Commerce, Energy Environmental Review and Analysis (via US Mail)

Attachment 1

Minor Alteration Request for Minnesota – Iowa 345 kV Transmission Line Project and Associated Facilities in Jackson, Martin, and Faribault Counties: North of US Highway 169 to South of the Winnebago Junction Substation

Background and Summary of Request

On November 25, 2014, the Minnesota Public Utilities commission ("Commission") issued a Route Permit for ITC Midwest LLC ("ITC Midwest") to construct the Minnesota – Iowa 345 kV Transmission Project and Associated Facilities in Jackson, Martin, and Faribault Counties ("Project"). ITC Midwest submits this application to the Commission for approval of a minor alteration of the route approved for the Project for the Associated Facilities around the Winnebago Junction Substation in Faribault County pursuant to Minnesota Rule 7850.4800. This minor alteration is proposed and described below.

ITC Midwest requests this minor alteration to provide additional route width to accommodate configuration of the Associated Facilities in a way that would allow for the Winnebago Junction Substation to remain energized throughout construction. Although this minor alternation would place the Associated Facilities around the perimeter of the Winnebago Junction Substation and the structures would be installed on property owned by ITC Midwest, the right-of-way along the north edge would reach onto the adjacent property as shown in Attachment 2 (page 2 of Attachment 2 provides a more detailed view of the requested minor alteration). Additionally, during detailed design, ITC Midwest engineers identified the need to replace the first structures out of the Winnebago Junction Substation north across US Highway 169 to maintain appropriate design standards. Specifically, this minor alteration is requested to accommodate revised alignments and rights-of-way for the Walters - Winnebago Junction 69 kV transmission line (built to 161 kV standards but operated at 69 kV) and the co-located 161 kV N.B.E.I. - Winnebago Junction/69 kV Winnebago Local -Winnebago Junction transmission line (built to 161 kV/161 kV standards but operated at 161 kV/69 kV). All landowners from whom an easement would be necessary to accommodate these new alignments around the Winnebago Junction Substation have agreed to this alignment.

Table 1. Summary of Requested Alignment Change

Structures Identifying Beginning and End of the Segment for the Change Requests	Distance Between Structure that Mark the End Points of the Segment	How Many Landowners are Affected	Describe the Requested Change and the Reason for the Change
North of US Highway 169 to South of the Winnebago Junction Substation Beginning: 1-Walters, 1-1, and 2-1 End: 1-2 and 2-2	2,266 feet Double-circuit: 1,096 feet Single-circuit: 1,170 feet	4 parcels, 4 landowners	The change is requested to ensure that the Winnebago Junction Substation and associated transmission lines can remain energized while the Associated Facilities circuits and Huntley Substation are constructed.

Minor Alteration Standard

A minor alteration is a change in a high voltage transmission line that does not result in significant changes in the human or environmental impact of the facility subject to the Power Plant Siting Act, Minnesota Statutes Chapter 216E. Permittees requesting a minor alteration must submit the application to the Commission. Minn. R. 7850.4800. The Commission is authorized to approve a minor alteration after providing "at least a tenday period for interested persons to submit comments on the application or to request that the matter be brought to the [C]ommission for consideration." Minn. R. 7850.4800, subp. 2.

As demonstrated below, the proposed minor alteration does not result in significant changes in the human or environmental impact of the facility. Tables showing the impacts of the Project if constructed along approved alignment compared to the proposed alignment are included below.

<u>Proposed Minor Alteration for Associated Facilities – North of US Highway 169 to South of the Winnebago Junction Substation</u>

The minor alteration request pertains to the Associated Facilities to the north and west of the Winnebago Junction Substation. This minor alteration is requested to accommodate revised alignments and rights-of-way for the Walters – Winnebago Junction 69 kV transmission line (built to 161 kV standards but operated at 69 kV) and the co-located 161 kV N.B.E.I. – Winnebago Junction/69 kV Winnebago Local – Winnebago Junction transmission line (built to 161 kV/161 kV standards but operated at 161 kV/69 kV). (Attachment 1).

ITC Midwest requests this minor alteration to provide sufficient route width to accommodate configuration of the Associated Facilities in a way that would allow for the Winnebago Junction Substation to remain energized throughout construction.

ATTACHMENT 1

Additionally, during detailed design, ITC Midwest engineers identified the need to replace the first structures out of the Winnebago Junction Substation north across US Highway 169 to maintain appropriate design standards. All landowners within the area of the minor alteration request are agreeable to the minor alteration and have already provided ITC Midwest with the necessary land rights to construct the Associated Facilities as proposed in this request.

The proposed alignment change will increase agricultural impacts by 1.59 acres, acres of forested land impacts by approximately 0.37 acres, and acres of grassland impacts by approximately 1.6 acres. These increases are primarily due to the fact that the permitted alignment for the circuits crossed the Winnebago Junction Substation itself whereas the proposed minor alteration follows the perimeter. Additionally, the permitted alignment and route did not extend north of US Highway 169, whereas the proposed minor alteration allows for the affected circuits to be co-located north of the highway. This will allow for the replacement of existing H-frame structures in this area with single pole structures. Impacts of the proposed minor alteration are comparable for most of the routing factors set forth in Minnesota Rule 7859.4100. Details for the requested alignment change are shown in Tables 2 and 3 below.

Table 2. Criteria and Data to Assess Impacts of Requested Route Adjustment: North of US Highway 169 to

South of the Winnebago Junction Substation

Criteria	Units	Permitted Alignment	Proposed Alignment	Other Information Important to this Request
Length of the Transmission Line	feet	2,521 ¹	2,266	
Length that is In or Parallel to Existing Right-of-Way	feet	2,521	2,266	
Number of Roads Crossed	number	0	1	US Highway 169
Number of Parcels Crossed	number	2	4	
Number of Residences Within the Right-of Way	number	0	0	

3

¹ The length of the Permitted Alignment is longer than the Proposed Alignment because the Permitted Alignment included several circuits on separate rights-of-way whereas the Proposed Alignment colocates circuits on combined rights-of-way.

ATTACHMENT 1

Criteria	Units	Permitted Alignment	Proposed Alignment	Other Information Important to this Request
Number of Non- Residential Buildings Within the Right- of- Way	number	0	0	
Area of Agricultural Land Within the Right- of-Way	acres	0.01	1.6	Permitted alignment crossed substation gravel/fenced area
Area of Forested Land Within the Right-of- Way	acres	0.001	0.37	Permitted alignment crossed substation gravel/fenced area
Area of Mineral or Metal Mining Resources within Right- of-Way	acres	0	0	No mineral or metal mining resources were identified in this area
Area of Wetlands Within the Right-of- Way	acres	0	0	Includes NWI & PWI
Area of Grassland Within the Right-of- Way	acres	4.0	5.6	Permitted alignment crossed substation gravel/fenced area
Area of Developed Land Crossed	acres	0	0	
Transmission Line Distance Across a Lake, Stream, Drainage, or other Waterway	feet	0	0	
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, count within species	0	0	
Number of Archaeological Resources Within the Right-of-Way	number	0	0	

ATTACHMENT 1

Table 3. Assessment of Impacts of Requested Alignment or Right-of-Way Change: North of US Highway 169 to South of the Winnebago Junction Substation

Routing Factor Minn. Rules 7850.1900 subp. 3. and Minn. Rules 7850.4100	Impact Regarding Alignment and Right-of-Way Change Requested
Effects on human settlement, including, but not limited to displacement, noise, aesthetics, cultural values, recreation and public services	No Change
Effects on public health and safety	No Change
Effects on land-based economies, including, but not limited to agriculture, forestry, tourism and mining	No Significant Change - additional 1.59 acres of agricultural land in ROW
Effects on archeological and historic resources	No Change
Effects on the natural environment, including effects on air and water quality resources and flora and fauna	No Significant Change - additional 0.37 acres of woodland in ROW; additional 1.6 acres of grassland in ROW
Effects on rare and unique natural resources	No Change
Application of design options that maximize energy efficiencies, mitigate adverse environmental effects, and could accommodate expansion of transmission or generating capacity	No Change
Use or paralleling of existing rights-of-way, survey lines, natural division lines, and agricultural field boundaries	No Significant Change
Use of existing large electric power generating plant sites	No Change
Use of existing transportation, pipeline, and electrical transmission systems or rights-of-way	No Significant Change
Electrical system reliability	No Significant Change
Cost of constructing, operation and maintenance which are dependent on design and route	No Significant Change
Human and natural environmental effects that cannot be avoided	No Change
Irreversible and irretrievable commitments of resources	No Change
Measures that might be implemented to mitigate the potential human and environmental impacts identified above and the estimated costs of the mitigative measures	No Change
Wilderness Areas: No high voltage transmission line may be routed through state or national wilderness areas (Prohibition, Minn. Rules 7850.4300)	No Change

Routing Factor Minn. Rules 7850.1900 subp. 3. and	Impact Regarding Alignment and Right-of-Way
Minn. Rules 7850.4100	Change Requested
Parks and Natural Areas: No high voltage transmission line may be routed through state or national parks or state scientific and natural areas unless the transmission line would not materially damage or impair the purpose for which the area was designated and no feasible and prudent alternative exists. Economic considerations alone do not justify use of these areas for a high voltage transmission line (Prohibition, Minn. Rules 7850.4300)	No Change

Landowner Notice and Comment Requirements

This minor alteration requires easements from two landowners and they are in agreement with the requested minor alteration. ITC Midwest is a property owner affected by this request but no easement is required. The Minnesota Department of Transportation ("MnDOT") owns the right-of-way for US Highway 169 and if the Commission approves the requested minor alteration, ITC Midwest will obtain the necessary approvals from MnDOT to cross the highway. The requested minor alteration will cross US Highway 169 in nearly the same location as the existing crossings of the three transmission line circuits and will co-locate facilities in this area. ITC Midwest is copying the landowners from whom easements are necessary for the proposed new alignment (Table 4) on this filing. Minnesota Rule 7850.4800, subpart 2, states that the Commission shall mail notice of receipt of this minor alteration request to those persons on the general list and to those persons on the project contact list. The Commission shall provide at least a 10-day period for interested persons to submit comments on the minor alteration request or to request the matter be brought to the Commission for consideration.

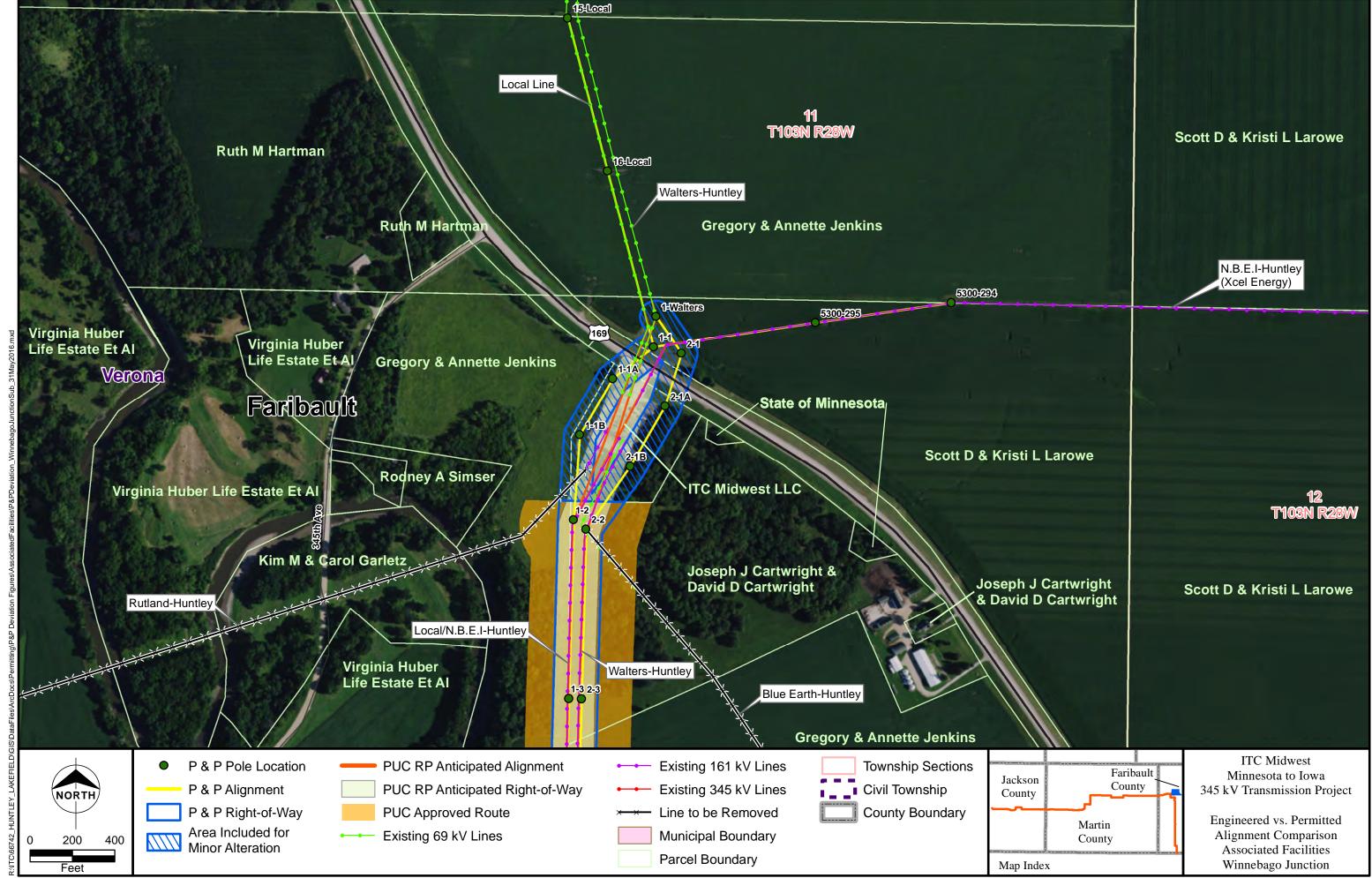
Table 4 Landowners of Property that Alteration Request Crosses

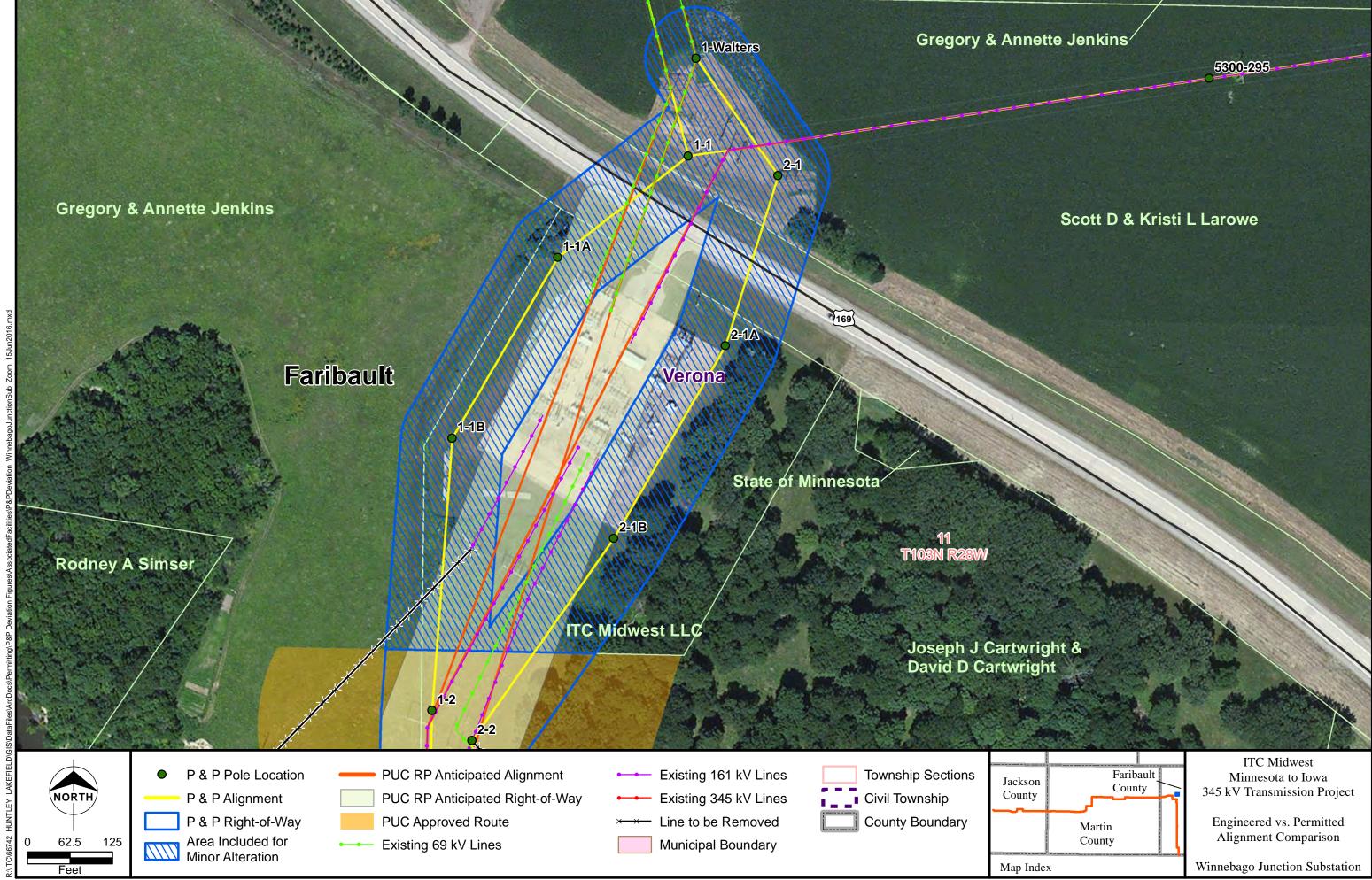
Name	PIN	Address	City	State	Zip
Scott & Kristi Larowe	180110902	31925 Lakeway Dr. NE	Cambridge	MN	55008
Gregory & Annette Jenkins	180110800	35481 – 170 th St	Winnebago	MN	56098
MnDOT	180110901	395 John Ireland Blvd	St Paul	MN	55155
ITC Midwest	180110800	27175 Energy Way	Novi	MI	48377

Conclusion

ITC Midwest respectfully requests that the Commission approve this proposed minor alteration.

Attachment 2





IN THE MATTER OF THE APPLICATION OF ITC MIDWEST LLC TO THE MINNESOTA PUBLIC UTILITIES COMMISSION FOR A ROUTE PERMIT FOR THE MINNESOTA – IOWA 345 KV TRANSMISSION LINE AND ASSOCIATED FACILITIES IN JACKSON, MARTIN, AND FARIBAULT COUNTIES

MPUC Docket No. ET6675/TL-12-1337

CERTIFICATE OF SERVICE

Jill N. Yeaman certifies that on the 27th day of June, 2016, she efiled a true and correct copy of ITC Midwest LLC's **REQUEST FOR MINOR ALTERATION** (**MINNESOTA RULE 7850.4800**) – **WINNEBAGO JUNCTION SUBSTATION** via eDockets (<u>www.edockets.state.mn.us</u>) and served the same on individuals named in the attached Landowner Mailing List and the Official Service List on file with the Minnesota Public Utilities Commission for Docket No. ET6675/TL-12-1337.

/s/ Jill N. Yeaman
Jill N. Yeaman

Landowner Mailing List

Name	PIN	Address	City	State	Zip
Scott & Kristi Larowe	180110902	31925 Lakeway Dr. NE	Cambridge	MN	55008
Gregory & Annette Jenkins	180110800	35481 – 170 th St	Winnebago	MN	56098
MnDOT	180110901	395 John Ireland Blvd	St Paul	MN	55155
ITC Midwest	180110800	27175 Energy Way	Novi	MI	48377

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Henry and Viola	Aberson Revok. Living Trust	N/A		1314 80th St. SE Rochester, MN 55904	Paper Service	No	OFF_SL_12-1337_Officia
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_12-1337_Official
Jeanne	Archie	jarchie@itctransco.com	ITC Midwest	123 5th ST SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_12-1337_Official
Duane	Behrens	porkb@yourstarnet.net		1692 160th Ave Fairmont, MN 56031	Electronic Service	No	OFF_SL_12-1337_Official
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000 Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_12-1337_Official
Richard	Caldecott	richardcaldecott@caldecott andforro.com		4669 White Bear Pkwy White Bear Lake, MN 55110	Paper Service	No	OFF_SL_12-1337_Official
Matthew S.	Carstens	mcarstens@itctransco.com	ITC Holdings Corp.	123 5th Street SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_12-1337_Official
Todd	Chadwell	Todd.Chadwell@powereng .com	Power Engineers	10640 Lyndale Ave S, Ste 1 Bloomington, MN 55420	Electronic Service	No	OFF_SL_12-1337_Official
Katie	Clark Sieben	katie.clark.sieben@state.m n.us	DEED	332 Minnesota St, #E200 1st National Bank Bld Saint Paul, MN 55101	Electronic Service	No	OFF_SL_12-1337_Official
Warren J	Day	warren@warrendaylaw.co m	Attorney-At-Law	2010 Hawkinson Rd Oregon, WI 53575	Electronic Service	No	OFF_SL_12-1337_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Randall	Doneen	randall.doneen@state.mn.u s	Department of Natural Resources	500 Lafayette Rd, PO Box 25	Electronic Service	No	OFF_SL_12-1337_Official
				Saint Paul, MN 55155			
Scott	Ek	scott.ek@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_12-1337_Official
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_12-1337_Official
Travis	Germundson	travis.germundson@state. mn.us		Board of Water & Soil Resources 520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	OFF_SL_12-1337_Official
David	Grover	dgrover@itctransco.com	ITC Midwest	901 Marquette Avenue Suite 1950 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_12-1337_Official
Timothy	lannettoni	tiannettoni@itctransco.com	ITC Trans Co	123 Fifth Street SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_12-1337_Official
Maynard	Jagodzinske	N/A		1506 120th Ave Welcome, MN 56181-1380	Paper Service	No	OFF_SL_12-1337_Official
Sarah	Jagodzinske Rohman	sjago@hotmail.com		1126 150th St Welcome, MN 56181	Electronic Service	No	OFF_SL_12-1337_Official
Linda	Jensen	linda.s.jensen@ag.state.m n.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134	Electronic Service	No	OFF_SL_12-1337_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ray	Kirsch	Raymond.Kirsch@state.mn .us	Department of Commerce	85 7th Place E Ste 500 St. Paul, MN 55101	Electronic Service	No	OFF_SL_12-1337_Official
Stacy	Kotch	Stacy.Kotch@state.mn.us	MINNESOTA DEPARTMENT OF TRANSPORTATION	395 John Ireland Blvd. St. Paul, MN 55155	Electronic Service	No	OFF_SL_12-1337_Official
Karen	Kromar	karen.kromar@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	OFF_SL_12-1337_Official
James	LaFave	james.lafave@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 55164-0620	Electronic Service	No	OFF_SL_12-1337_Official
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_12-1337_Official
Susan	Medhaug	Susan.medhaug@state.mn .us	Department of Commerce	Suite 500, 85 Seventh Place East St. Paul, MN 551012198	Electronic Service	No	OFF_SL_12-1337_Official
Carol A.	Overland	overland@legalectric.org	Legalectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_12-1337_Official
Bob	Patton	bob.patton@state.mn.us	MN Department of Agriculture	625 Robert St N Saint Paul, MN 55155-2538	Electronic Service	No	OFF_SL_12-1337_Official
Jeffrey	Small	jsmall@misoenergy.org		MISO P.O. Box 4202 Carmel, Indiana 46082-4202	Electronic Service	No	OFF_SL_12-1337_Official
Kodi	Verhalen	kverhalen@briggs.com	Briggs & Morgan	2200 IDS Center 80 South Eighth Stree Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_12-1337_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_12-1337_Official