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July 12, 2016

Daniel Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

RE: EERA Comments and Recommendations
ITC Midwest LLC Proposed Minor Alteration of Associated Facilities at the Winnebago
Junction Substation
Minnesota to Iowa 345 kV Transmission Line Project
Docket No. ET6675/TL-12-1337

Dear Mr. Wolf,

Attached are comments and recommendations of Department of Commerce, Energy
Environmental Review and Analysis (EERA) staff in the above matter.

ITC Midwest LLC has requested approval of a minor alteration of the route permit for the
Minnesota to Iowa 345 kV transmission line project. ITC Midwest LLC is seeking approval to
relocate existing transmission lines at the Winnebago Junction substation in a manner that
facilitates continued operation of the substation during construction of the project. The minor
alteration application was filed on June 27, 2016, by:

David Grover
ITC Midwest LLC
901 Marquette Ave., Suite 1950
Minneapolis, MN 55402

These comments are based on EERA staff's review of the minor alteration application and the
record to date. Staff is available to answer any questions the Commission may have.

Sincerely,

A handwritten signature in black ink, appearing to read "Ray Kirsch". The signature is fluid and cursive, with the first name "Ray" being more prominent.

Ray Kirsch
EERA Staff

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BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**COMMENTS AND RECOMMENDATIONS OF
MINNESOTA DEPARTMENT OF COMMERCE
ENERGY ENVIRONMENTAL REVIEW AND ANALYSIS**

DOCKET No. ET6675/TL-12-1337

Date: July 12, 2016

EERA Staff: Ray Kirsch.....651-539-1841

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

Issues Addressed: These comments address whether the Commission should authorize a minor alteration of the route permit to relocate existing transmission lines at the Winnebago Junction substation in a manner that facilitates continued operation of the substation during project construction.

Documents Attached: (A) Map of associated facilities at Winnebago Junction and Huntley substations.

Additional documents and information can be found on
eDockets: <https://www.edockets.state.mn.us/EFiling/search.jsp> (12-1337) and on the Department's website: <http://mn.gov/commerce/energyfacilities/Docket.html?Id=33080>.

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

Introduction and Background

On November 25, 2014, the Commission issued a route permit to ITC Midwest LLC (ITCM) for the Minnesota to Iowa 345 kV transmission line project.¹ On June 27, 2016, ITCM applied to the Commission for approval of a minor alteration of the route permit.² ITCM subsequently supplemented

¹ Order Issuing a Route Permit, November 25, 2015; Route Permit for Construction of a High-Voltage Transmission Line and Associated Facilities in Jackson, Martin and Faribault Counties Issued to ITC Midwest LLC, November 25, 2014, Docket No. ET6675/TL-12-1337, eDockets Number [201411-104935-01](#) [hereinafter Route Permit].

² Request for Minor Alteration of Associated Facilities, June 27, 2016, Docket No. ET6675/TL-12-1337, eDockets Number [20166-133672-01](#) [hereinafter Minor Alteration Request].

their request.³

ITCM is seeking approval to relocate existing transmission lines at the Winnebago Junction substation in a manner that facilities continued operation of the substation during project construction.⁴ Several existing transmission lines currently connect to the Winnebago Junction substation. As part of the project, this substation is being removed and replaced with a new substation – the Huntley substation – approximately one mile south of the existing Winnebago Junction substation. All existing transmission lines (referred to in the permitting process as “associated facilities”) must be relocated and rebuilt such that they connect at the new Huntley substation (see attached associated facilities map).⁵ ITCM’s request seeks to affect this relocation and rebuilding while maintaining the continued operation of the Winnebago Junction substation.

ITCM is seeking approval to relocate two existing transmission lines around the Winnebago Junction substation rather than through the substation. Going around the substation allows the substation to remain in operation during construction. ITCM requests that the existing single circuit 69 kV “Walters” transmission line be routed along the eastern edge of the Winnebago Junction substation.⁶ ITCM requests that the existing double circuit 161/69 kV “N.B.E.I.” transmission line be routed along the western edge of the substation.⁷ ITCM notes that new transmission line structures north of U.S. Highway 169 will be required to facilitate the transmission lines going around the substation.⁸

ITCM’s requested “going around the substation” approach requires right-of-way that would be outside of the route permitted by the Commission.⁹ ITCM indicates that all landowners from whom an easement would be necessary to go around the Winnebago Junction substation with the two existing transmission lines are agreeable to ITCM’s proposal.¹⁰

On June 28, 2016, the Commission issued a notice soliciting comments on whether ITCM’s proposed relocation of two existing transmission lines at the Winnebago Junction substation is a minor alteration that should be approved by the Commission.¹¹

Regulatory Process and Procedures

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.”¹²

³ Supplement to Request for Minor Alteration of Associated Facilities, June 30, 2016, Docket No. ET6675/TL-12-1337, eDockets Number [20166-122888-01](#) [hereinafter Minor Alteration Request Supplement].

⁴ Minor Alteration Request.

⁵ Route Permit, Modified Route A, Faribault County, Sheet 2A of 12.

⁶ Minor Alteration Request.

⁷ Id.

⁸ Id.

⁹ Id. The area required to accommodate the right-of-way is approximately seven acres (see Minor Alteration Request Supplement).

¹⁰ Minor Alteration Request.

¹¹ Notice of Comment Period on Minor Alteration Application, June 28, 2016, Docket No. ET6675/TL-12-1337, eDockets Number [20166-122672-01](#).

¹² Minnesota Rule 7850.4800.

The Commission has interpreted a minor alteration to be available for existing facilities and for those which have been permitted by the Commission but not yet constructed.¹³

The Commission may authorize the minor alteration or determine that the alteration is not minor and requires a full permitting decision.¹⁴ The Commission may authorize the minor alteration but impose reasonable conditions on the approval.¹⁵

EERA Staff Analysis and Comments

Department of Commerce, Energy Environmental Review and Analysis (EERA) staff has reviewed ITCM's minor alteration application and the record to date. Based on this review, EERA staff believes that ITCM's proposed relocation of two existing transmission lines at the Winnebago Junction substation will not result in significant changes in the human or environmental impacts of the project and is eligible for authorization as a minor alteration.

Minnesota Rule 7850.4800 provides a succinct standard for evaluating minor alteration applications – whether the proposed project will result in significant changes in the human and environment impacts of the project. To flesh out this standard, EERA staff utilized the routing factors of Minnesota Rule 7850.4100. These are the factors considered by the Commission in permitting a new high voltage transmission line. These factors provide appropriate detail for evaluating the significance of potential human and environmental impacts.

EERA staff believes that the potential impacts of ITCM's proposed relocation are similar to the impacts of the project as permitted (see Table 1). Relocating the two existing transmission lines will impact approximately 1.6 additional acres of agricultural land. The relocation will also impact approximately 0.4 additional acres of forested land. On whole, EERA staff finds that the proposed relocation does not result in significant changes in the human or environmental impacts of the project.

Table 1. Changes in Potential Impacts with Respect to Routing Factors

Routing Factor	EERA Comments
A. Human Settlements	No significant change.
B. Public Health and Safety	No change.

¹³ See Commission Order Approving Minor Alteration and Issuing a Route Permit Amendment, January 9, 2013, Docket No. E-002, ET-2/TL-09-1056, eDockets Number [20121-70082-01](#).

¹⁴ Minnesota Rule 7850.4800, Subp. 3.

¹⁵ Id.

Routing Factor	EERA Comments
C. Land-Based Economies	No significant change. The proposed relocation will impact approximately 1.6 additional acres of agricultural land. ¹⁶
D. Archaeological and Historic Resources	No change.
E. Natural Environment	No significant change. The proposed relocation will impact approximately 0.4 additional acres of forested land. ¹⁷
F. Rare and Unique Natural Resources	No change.
G. Design Options that Maximize Energy Efficiencies, Mitigate Adverse Environmental Impacts, and Accommodate Expansion	No change.
H. Use or Paralleling of Existing Right-of-Way	No significant change.
I. Use of Existing Large Electric Power Generating Plant Sites	Not applicable.
J. Use of Existing Transportation, Pipeline, and Electrical Transmission Right-of-Way	No significant change. The proposed relocation will not utilize the existing right-of-way through the Winnebago Junction substation.
K. Electrical System Reliability	No change.
L. Costs	No significant change.

¹⁶ Id.
¹⁷ Id.

EERA Staff Recommendation

EERA staff recommends that the Commission approve ITCM's request to relocate existing transmission lines at the Winnebago Junction substation and authorize a minor alteration of the route permit for the Minnesota to Iowa 345 kV transmission line project.