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June 6, 2019

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VIA ELECTRONIC FILING AND U.S. MAIL

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

**Re: In the Matter of the Applications of Xcel Energy and ITC Midwest for a
Certificate of Need and a Route Permit for the Huntley-Wilmarth 345 kV
Transmission Line Project
MPUC Docket Nos. E002,ET6675/CN-17-184 and E002,ET6675/TL-17-185
OAH Docket No. 82-2500-35157**

Dear Mr. Wolf:

Enclosed for filing on behalf of Northern States Power Company, doing business as Xcel Energy, and ITC Midwest LLC (collectively, the Applicants), please find the Applicants' Exceptions to the Administrative Law Judge's Report.

By copy of this letter, I am providing service to those on the service list on file with Commission. Please feel free to contact me with any questions regarding this filing.

Sincerely,

Valerie T. Herring

VTH:jy
Enclosures
cc: Official Service Lists

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

Katie Sieben	Chair
Dan Lipschultz	Commissioner
Matthew Schuerger	Commissioner
John Tuma	Commissioner
Valerie Means	Commissioner

IN THE MATTER OF THE APPLICATION
OF XCEL ENERGY AND ITC MIDWEST
FOR A CERTIFICATE OF NEED FOR THE
HUNTLEY-WILMARTH 345 kV
TRANSMISSION LINE PROJECT

DOCKET NO. E002, ET6675/CN-17-184
OAH DOCKET NO. 82-2500-35157

IN THE MATTER OF THE APPLICATION
TO THE MINNESOTA PUBLIC UTILITIES
COMMISSION FOR A ROUTE PERMIT FOR
THE HUNTLEY-WILMARTH 345 kV
TRANSMISSION LINE PROJECT

DOCKET NOS. E002, ET6675/TL-17-185
OAH DOCKET NO. 82-2500-35157

**APPLICANTS' EXCEPTIONS TO THE
ADMINISTRATIVE LAW JUDGE'S REPORT**

I. INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, and ITC Midwest LLC (ITC Midwest) (together, the Applicants) respectfully submit the following exceptions to the Findings of Fact, Conclusions, and Recommendation (Report) issued by the Administrative Law Judge (ALJ) for the proposed Huntley – Wilmarth Transmission Line Project (Huntley – Wilmarth Project or Project). The Applicants appreciate the comprehensive and thorough analysis of the record evidence and the applicable statutory and rule criteria contained in the ALJ Report. While the Applicants generally take no issue with the ALJ's findings and

recommendations, the Applicants seek to clarify one aspect of the ALJ's Report related to the inclusion of Alignment Alternative AA-3b as part of the ALJ's overall recommendation of the "Purple-BB-L-AA3b Route." Specifically, the Applicants request that the Commission's order note that inclusion of this alignment alternative denotes only that Alignment Alternative AA-3b is the anticipated alignment, among the three possible alignment alternatives, for this portion of the route. To document this clarification, the Applicants request that Finding No. 506 be modified as follows:

The record evidence supports ~~the addition of~~ Alignment Alternative AA-3b as the anticipated alignment for the Purple-BB-L Route. Alignment Alternative AA-3b avoids the displacement of a seasonal residence near the Huntley substation and minimizes impacts to forest habitat associated with the Blue Earth River.¹

This clarification is important because an anticipated alignment affords the Applicants the flexibility to work with impacted landowners and the Minnesota Department of Natural Resources (MnDNR) within the 1,000 foot route width to determine a final alignment. Similar to all other portions of the route, any change between the anticipated alignment and the final alignment within the route width is then documented by the Applicants in a "plan and profile" filing which is reviewed by Commission staff.

Such flexibility is needed for this one mile portion of the Purple-BB-L Route west of the Huntley Substation as there are routing constraints on both the north and

¹ Ex. EERA-21 at 7-72 to 7-65 (Final EIS)(eDocket No. 20194-151655-18); MnDNR Comments (Mar. 14, 2019) (eDocket No. 20193-151077-01).

south side of 160th Street. On the north side of the road, there is a seasonal trailer² and potential impacts to the forested habitat near the Blue Earth River; however, due to the number existing transmission facilities in this area, routing on the south side of the road would require two additional crossings of existing transmission lines.

Attachment 1 to these exceptions documents the Applicants' proposed change to Finding No. 506, as well as other minor proposed corrections, in redline format, along with a short explanation for these corrections. Further, the Applicants have reviewed and agree with the changes proposed in the Department of Commerce, Energy Environmental Review and Analysis's (DOC EERA) June 4, 2019 exceptions filing.³ Accordingly, the Applicants request that in its final order, the Commission adopt all of the Applicants' proposed changes outlined in Attachment 1 as well as the changes proposed in DOC EERA's exceptions filing.

II. DISCUSSION

When the Commission issues a route permit, it approves a route, a route width, and an anticipated alignment with that route width.⁴ The requested route width, in this case 1,000 feet, is wider than the actual right-of-way, here 150 feet, needed for the construction, operation, and maintenance of the transmission line.⁵ This additional width provides flexibility in designing and constructing the line to allow the permittee

² This seasonal trailer used sporadically during the year and is not currently connected to a well or septic system. Ex. EERA-20B at 2-3 (Applicants' Comments on the Draft EIS) (eDocket No. 20192-150008-03).

³ Department of Commerce, Energy Environmental Review and Analysis Exceptions to the ALJ Report (June 4, 2019)(eDocket Nos. 20196-153351-01 and 20196-153352-01).

⁴ Ex. EERA-21 at 3-25 (Final EIS) (eDocket No. 20194-151655-08).

⁵ Ex. EERA-21 at 3-25 to 3-26 (Final EIS) (eDocket No. 20194-151655-08).

the ability to work with landowners to address their concerns (e.g., drain tiles in fields) and to adjust for any engineering or soil issues encountered during final design.⁶

Within the route width, an anticipated alignment is designated which is the expected placement of the centerline of the transmission line.⁷ After working with landowners and completing final design, the permittee establishes the final alignment within the route width.⁸ This final alignment is submitted to the Commission as part of a plan and profile filing.⁹ In areas where the final alignment diverges from the anticipated alignment, the route permit provides that Applicants will specifically identify and document these changes in the plan and profile filing.¹⁰ In addition, any modification to the anticipated alignment must have comparable overall impacts relative to the factors in Minn. R. 7850.4100.¹¹ The Commission has 30 days to review these plan and profile submissions to ensure they are consistent with the route permit.¹²

Three different alignments were proposed for the approximately one mile segment of the Purple-BB-L Route west of the Huntley Substation along 160th Street. These three alignment alternatives are: (1) the original Purple Route alignment on the north side of 160th Street and north of ITC Midwest's existing Minnesota – Iowa

⁶ Ex. EERA-21 at 3-25 (Final EIS) (eDocket No. 20194-151655-08).

⁷ Ex. EERA-21 at 3-27 (Final EIS) (eDocket No. 20194-151655-08).

⁸ Ex. EERA-21 at 3-27 (Final EIS) (eDocket No. 20194-151655-08).

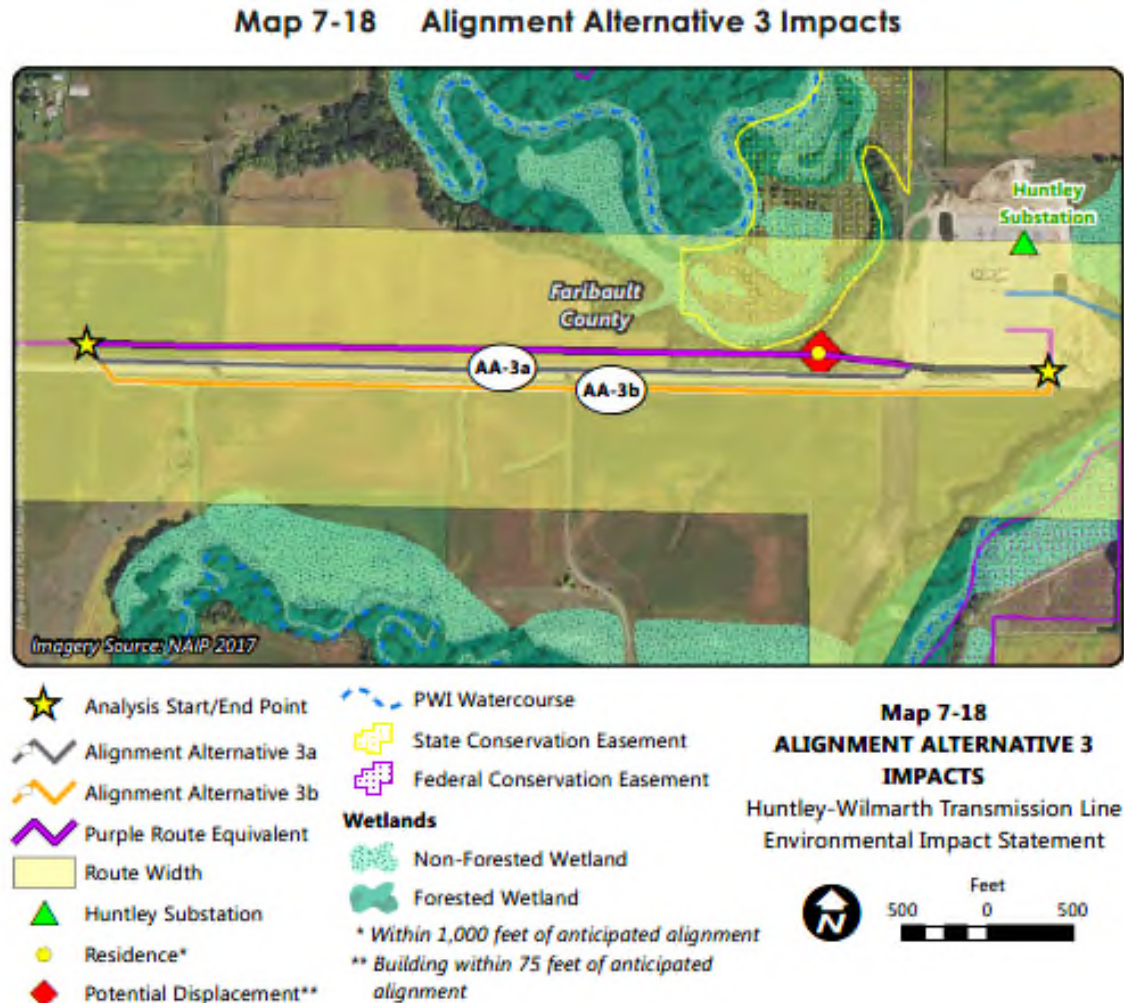
⁹ Ex. EERA-21 at 3-27 (Final EIS) (eDocket No. 20194-151655-08).

¹⁰ Commission HVTL Permit Template at 2 (Aug. 2, 2018) (eDocket No. 20188-145486-01).

¹¹ Commission HVTL Permit Template at 2 (Aug. 2, 2018) (eDocket No. 20188-145486-01).

¹² Commission HVTL Permit Template at 12 (Aug. 2, 2018) (eDocket No. 20188-145486-01).

345/161 kV transmission line (MN-IA Line); (2) Alignment Alternative AA-3a which would triple-circuit the 345 kV line with existing MN-IA Line; and (3) Alignment Alternative AA-3b on the south side of 160th Street. These alignments are shown below in map 7-18 from the Final Environmental Impact Statement (Final EIS).¹³



There is a seasonal trailer on the north side of 160th Street and the owner of this trailer is opposed to both alignments (original Purple and AA3-a) across her

¹³ Ex. EERA-21 at 7-62 (Final EIS)(eDocket No. 20194-151655-18).

property.¹⁴ The landowner on the south side of 160th Street did not provide comments into the hearing record. There is also forested habitat on the north side of 160th Street and the MnDNR prefers Alignment Alternative AA-3a and Alignment Alternative AA-3b over the original Purple Route alignment due to reduced impacts to this habitat.¹⁵

Routing in this area is further complicated by ITC Midwest's existing MN/IA Line located on the north side of 160th Street. Utilizing Alignment Alternative AA-3b on the south side of the road will require the proposed 345 kV line to cross the MN/IA Line two additional times. Preliminary design shows these crossings require two H-frame structures at each crossing. These four additional foundations add additional impacts to agriculture and increase aesthetic impacts in a congested area. Both alignment alternatives are more expensive than the original Purple Route alignment. The triple-circuit design of the Alternative Alignment AA-3a adds approximately \$2.64 million (2016\$) and Alignment Alternative AA-3b adds approximately \$700,000 to the cost of the Purple Route.¹⁶

As stated in Applicants' comments on the Draft EIS, all three alignments in this area are feasible and constructible.¹⁷ However, the Applicants prefer to avoid the

¹⁴ Mankato 1:00 p.m. Pub. Hrg. Tr. at 31 (Davis) (Feb. 27, 2019).

¹⁵ MnDNR Comments (Mar. 14, 2019) (eDocket No. 20193-151077-01).

¹⁶ Ex. EERA-21 at 7-63, Table 7-16 (Final EIS) (eDocket No. 20194-151655-18).

¹⁷ Ex. XC-26 at 4-5 (Stevenson Rebuttal) (eDocket No. 201812-148564-04).

triple-circuit design required by Alignment Alternative AA-3a due to operational concerns and safety concerns during maintenance.¹⁸

The ALJ recommended selection of Alignment Alternative AA-3b because this alignment avoids potential displacement of the seasonal trailer and minimizes impacts to forest habitat near the Blue Earth River.¹⁹ However, the Applicants believe that impacts to the seasonal trailer from the original Purple Route alignment can be avoided through the use of alternative structure and conductor designs or by moving the trailer slightly.²⁰ In addition, the Applicants intend to work with the MnDNR to mitigate impacts on the forested habitat by proposing to plant a pollinator friendly prairie habitat in place of existing forest habitat.

To allow the Applicants the ability to work with the impacted landowners on both the north and south side of 160th Street and the MnDNR on a final alignment in this area, the Applicants request that the Commission's order clarify that Alignment Alternative AA-3b is the anticipated alignment for this portion of the route. The Applicants will then work with landowners on both the north and south side of 160th Street and the MnDNR to determine an appropriate alignment within the 1,000 foot route width in this area. The final selected alignment will then be documented and explained as part of the Applicants' plan and profile filing for this segment.

¹⁸ Ex. XC-26 at 5 (Stevenson Rebuttal) (eDocket No. 201812-148564-04). Triple-circuiting would also require removal and replacement of the structures for MN/IA Line which are less a year old. Ex. XC-26 at 4 (Stevenson Rebuttal) (eDocket No. 201812-148564-04).

¹⁹ ALJ Report at Finding 506 at p. 175.

²⁰ Ex. XC-26 at 4-5 (Stevenson Rebuttal) (eDocket No. 201812-148564-04).

III. CONCLUSION

The Applicants respectfully request that the Commission adopt the ALJ Report in its entirety with the exception of the requested modifications outlined in Attachment 1.

Dated: June 6, 2019

Respectfully submitted,

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Table of Applicants' Proposed Exceptions to ALJ Report

CERTIFICATE OF NEED FINDINGS OF FACT, CONCLUSIONS OF LAW, AND RECOMMENDATION		
Citation to ALJ Report	Applicants' Proposed Modification	Reason for Modification
Finding No. 120 at p. 23	Ideally, an Xcel Energy or ITC Midwest customer would always be supplied electricity produced at the lowest cost possible at the time. For this to occur, the output of the lowest cost generator, which may not be one of Xcel Energy's generators , must be transmitted to Xcel Energy substations and from there to its customers. Transmission lines have finite capacities to deliver electricity. As new generators are constructed and as economic development and growth change the quantities and locations where electricity is consumed, the existing transmission system may be unable to deliver all of the low-cost power available; that is, the transmission system is congested. ²¹	As customers throughout the MISO footprint benefit from reduced transmission congestion, the Applicants propose to modify this finding so that it is not limited to Xcel Energy and ITC Midwest customers.
Finding No. 125 at p. 25	Transmission system congestion <u>affects both the cost of energy, deliverability of energy, and the efficiency of the electrical system.</u> also reduces the reliability of the electric system. ²² The Applicants, as well as MISO and the CEOs, assert that the Project will "relieve congestion on the electrical transmission grid in southern Minnesota and northern Iowa" and "increase market access to lower-cost energy, provide economic benefits, strengthen the regional grid, and reduce curtailments of wind generators in the region." ²³	Transmission system congestion typically does not impact reliability. The Applicants' proposed modification outlines the primary impacts of congestion.
Finding No. 165 at Table 3 on p 37.	Cost for Purple-E-AA1-Red-Q Route on the last row, second column of Table 3 should be listed as \$160.2 million (2016\$) rather than \$159.7 million (2016\$). ²⁴	Applicants made an errata filing on April 3, 2019 that corrected the cost for Purple-E-AA1-Red-Q that was contained in the Applicants' proposed Findings of Fact, Conclusions of Law, and Recommendation.
Finding No. 194 at p. 45	As a MEP, the Project's <u>revenue requirements</u> costs will ultimately be shared within the region such that Xcel Energy's NSP Companies' load will pay 16.96	Applicants proposed modification to more precisely detail the category of

²¹ Ex. CEOs-1 at 4 (Goggin Direct); Ex. XC-6 at 6 (Certificate of Need Application).

²² Ex. XC-6 at Appendix G at 1 (Applicants Summary of MISO Study Process).

²³ Ex. EERA-13 at 4-1 (Draft EIS); see also Ex. XC-6 at 1-2 (Certificate of Need Application); CEOs-1 at 2-4, 11-12 (Goggin Direct).

²⁴ Applicants' Errata Filing (Apr. 3, 2019) (eDocket No. 20194-151666-01 and 20194-151666-02).

	percent of the year one revenue requirement total monetary costs. ²⁵ Customers from outside of Xcel's service territory in Minnesota will benefit from the Project and absorb, through their serving utilities, some of the Project's revenue requirements costs. The Applicants calculate that, depending on the route and segment and design alternatives chosen, that the <u>allocation of the MISO Attachment GG year one revenue requirement for the Project to the state of Minnesota load would be jurisdiction will ultimately pay between \$4.1 and \$5.3 million, of the Project's cost.</u> ²⁶ However, because ITC Midwest does not have any load in the region, it will not be allocated any of the Project's costs. ²⁷	costs discussed in this finding.
ROUTE PERMIT FINDINGS OF FACT, CONCLUSIONS OF LAW, AND RECOMMENDATION		
Citation to ALJ Report	Applicants' Proposed Modification	Reason for Modification
Finding No. 190 at p. 123	The Applicants again met with MnDNR staff on May 23, 2017, to discuss potential crossing of Minneopa State Park. The MnDNR requested additional descriptions of park impacts, and the Applicants followed up with a preliminary design <u>for Segment Alternative C</u> that showed that no poles would be placed in parkland and that structures could be designed to keep energized lines above existing tree height to minimize tree clearing in the park. ²⁸	This text relates to the proposed design for Segment Alternative C. The design for the Purple-BB-L Route would require the placement of one structure within state-owned parkland. ²⁹
Finding No. 506 at p. 175	The record evidence supports the addition of Alignment Alternative AA-3b <u>as the anticipated alignment for</u> the Purple-BB-L Route. Alignment Alternative AA-3b avoids the displacement of a seasonal residence near the Huntley substation and minimizes impacts to forest habitat associated with the Blue Earth River. ³⁰	Modification proposed to allow the Applicants flexibility to work with landowners on an appropriate alignment for the Purple-BB-L Route near the Huntley Substation.

²⁵ Ex. XC-6 at Appendix J (Cost Allocation Information).

²⁶ Ex. XC-6 at Appendix J (Cost Allocation Information).

²⁷ Ex. DER-1 at 7 (Johnson Direct).

²⁸ Ex. XC-7 at 177 (Route Permit Application).

²⁹ Ex. XC-19 at 11 (Hillstrom Direct).

³⁰ Ex. EERA-21 at 7-72 to 7-65 (Final EIS); MnDNR Comments (Mar. 14, 2019).

Attachment 1

Finding No. 508 at p. 175-176	The Purple-BB-L-AA3b Route also is among the higher cost (\$140.8 million (2016\$)) routes and has a benefit-to-cost ratio well above 1.0 (about 4.63 1.62 under MTEP17 and 4.28 1.27 under MTEP18). As the estimated costs for the Purple-BB-L-AA3b Route are more than 25 percent greater than the MISO baseline cost estimate, selection of the Purple-BB-L-AA3b Route would trigger the MISO variance process.	The benefit-to-cost ratios provided by the Applicants were for the Purple-BB-L Route that has a cost of \$140.1 million (2016\$). The benefit-to-cost ratios for the Purple-BB-L-AA3b Route that has a cost of \$140.8 million (2016\$) are slightly lower due to the higher cost.
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IN THE MATTER OF THE APPLICATION OF
XCEL ENERGY AND ITC MIDWEST FOR A
CERTIFICATE OF NEED AND A ROUTE
PERMIT FOR THE HUNTLEY-WILMARTH
345 kV TRANSMISSION LINE PROJECT

MPUC DOCKET No. E-002, ET-6675/CN-17-184
MPUC DOCKET No. E-002, ET-6675/TL-17-185

OAH DOCKET No. 82-2500-35157

Roshelle L. Herstein certifies that on the 6th day of June, 2019, she filed a true and correct copy of **Applicants' Exceptions to the Administrative Law Judge's Report**, by posting the same on www.edockets.state.mn.us. Said document has also been served via U.S. Mail or e-mail as designated on the attached Official Service Lists on file with the Minnesota Public Utilities Commission in the above-referenced dockets.

/s/ Roshelle L. Herstein
Roshelle L. Herstein

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