

Direct Testimony and Schedules
Thomas G. Hillstrom

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

IN THE MATTER OF THE APPLICATION Docket No. E002, ET6675/CN-17-184
OF NORTHERN STATES POWER
COMPANY AND ITC MIDWEST LLC OAH Docket No. 82-2500-35157
FOR A CERTIFICATE OF NEED FOR THE
HUNTLEY-WILMARTH 345 kV
TRANSMISSION LINE PROJECT

IN THE MATTER OF THE APPLICATION Docket No. E002, ET6675/RP-17-185
TO THE MINNESOTA PUBLIC UTILITIES
COMMISSION FOR A ROUTE PERMIT OAH Docket No. 82-2500-35157
FOR THE HUNTLEY-WILMARTH 345 kV
TRANSMISSION LINE PROJECT

DIRECT TESTIMONY OF

THOMAS G. HILLSTROM

On Behalf of

NORTHERN STATES POWER COMPANY,
A MINNESOTA CORPORATION

and

ITC MIDWEST LLC

September 6, 2018

Exhibit ____ (TGH-1)

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Schedules

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I. INTRODUCTION

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Thomas G. Hillstrom, and my business address is 414 Nicollet Mall, Minneapolis, Minnesota 55401.

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

A. I am employed as a Principal Permitting Agent by Xcel Energy Services Inc., the service company provider for Northern States Power Company, doing business as Xcel Energy (Xcel Energy). In my current position, I am responsible for the federal, state, and local permitting for the Huntley – Wilmarth 345 kilovolt (kV) Transmission Line Project (Huntley – Wilmarth Project or Project).

Q. PLEASE SUMMARIZE YOUR QUALIFICATIONS AND EXPERIENCE.

A. I earned a Bachelor of Science degree in biology from the University of Minnesota and have worked in the environmental field for the past 28 years. For the most recent 13 years, I have worked as an employee of Xcel Energy and as an independent contractor for the utility industry. During this time, I have gained extensive experience in developing routes for transmission line projects and analyzing potential environmental impacts of such projects. My resume is attached as Exhibit____(TGH-1), Schedule 1.

1 Q. FOR WHOM ARE YOU TESTIFYING?

2 A. I am testifying on behalf of Xcel Energy and ITC Midwest LLC (ITC
3 Midwest) (collectively, the Applicants) for a Certificate of Need and Route
4 Permit for the Huntley – Wilmarth Project.

5
6 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?

7 A. The purpose of my testimony is to provide an overview of the routing
8 efforts undertaken by the Applicants prior to filing the Route Permit
9 Application (Application) for the Project, describe further routing efforts
10 undertaken by the Applicants since filing the Application, and provide
11 information on the environmental considerations for the various routes
12 under consideration for the Huntley – Wilmarth Project. I will also discuss
13 feedback that the Applicants have received from federal, state, and local
14 units of government on the proposed routes. Finally, I will discuss the
15 public outreach that the Applicants have conducted since filing the
16 Application.

17
18 Q. WHAT SCHEDULES ARE ATTACHED TO YOUR TESTIMONY?

19 A. The following schedules are attached to my testimony:

20 Schedule 1: Resume of Tom Hillstrom;

21 Schedule 2: Map of Applicants' Proposed Routes and Alternatives
22 Proposed During Scoping;

23 Schedule 3: Applicants' March 16, 2018, Blue Route Realignment Letter;

24 Schedule 4: Applicants' May 18, 2018, Scoping Comment Letter; and

25 Schedule 5: Applicants' April 2018 and September 2018 Mailings.

26

1 Q. ARE YOU AVAILABLE TO PROVIDE TESTIMONY IN SUPPORT OF PARTICULAR
2 SECTIONS OF THE CERTIFICATE OF NEED AND ROUTE PERMIT
3 APPLICATIONS?

4 A. Yes. I am testifying in support of the following sections of the Certificate of
5 Need Application: Section 1.5 (Potential Environmental Impacts); Section
6 1.6 (Public Involvement); Section 2.2 (Applicants' Proposed Routes); and
7 Chapter 8 (Environmental Information). I am also testifying in support of
8 the following sections of the Route Permit Application: Section 2.2
9 (Proposed Routes); Section 2.3 (State Park Crossing); Section 2.4 (Route
10 Width); Section 2.6 (Transmission Line Right-of-Way); Chapter 3 (Route
11 Selection Process); Chapter 4 (Description of Proposed Routes); Section 5.1
12 (Right-of-Way Acquisition); Chapter 6 (Environmental Information: All
13 Routes); Chapter 7 (Federal and State Agency, Local Government, and
14 Public Involvement); and Chapter 8 (Required Permits, Approvals, and
15 Consultations).

17 II. APPLICANTS' PROPOSED ROUTE AND DESIGN OPTIONS

19 Q. PLEASE PROVIDE A GENERAL DESCRIPTION OF THE PROJECT.

20 A. Applicants propose to construct a new 345 kV transmission line,
21 approximately 50 miles in length, between the existing Wilmarth Substation,
22 located in northern Mankato and the existing Huntley Substation, located
23 south of Winnebago. In examining potential routes for the new 345 kV
24 transmission line between these two substations, there are both routing
25 opportunities, such as existing transmission lines, as well as routing

constraints, such as population centers, environmentally sensitive areas, federal wildlife protection areas, and Minneopa State Park.

Q. WHAT ROUTES DID THE APPLICANTS PRESENT FOR THE PROJECT IN THE ROUTE PERMIT APPLICATION (APPLICATION)?

A. The Applicants presented four routes in the Application. The routes are identified (from west to east) as Purple, Green, Red, and Blue. Six route segment alternatives were also included in the Application. These segments are labeled A through F. These routes and route segment alternatives are shown in Exhibit____(TGH-1), Schedule 2 to my Direct Testimony.

Q. HOW DID THE APPLICANTS DEVELOP THE FOUR ROUTES PRESENTED IN THE APPLICATION?

A. Applicants have extensive experience routing transmission lines in multiple states and we followed a well-established process that has been developed over the course of several transmission line routing projects. This process is guided by the routing criteria set forth in Minnesota law¹ and involved months of careful study, including extensive landowner and stakeholder outreach.

Applicants first developed a Project Study Area (36 miles long and 29 miles wide) between the two substation endpoints. Using mapping data, Applicants identified routing constraints (i.e., areas to avoid) as well as existing linear features that may be followed, including infrastructure corridors and property lines.

¹ Minn. Stat. § 216E.03, subd. 3; Minn. R. 7850.1900, subp. 2(C).

1
2 In early 2017, with that information in hand, the Applicants identified a
3 network of potential route segments that could be pieced together to form
4 end-to-end routes. Applicants began field visits at this early stage to confirm
5 mapping data and gain a better understanding of the Project Study Area.
6 Concurrently, Applicants met with local government units and federal and
7 state agencies. Public meetings were held in mid-2017 to inform the public
8 of the Project and to gather feedback on the initial routes. Applicants then
9 evaluated and refined the end-to-end routes, ultimately developing the four
10 routes (Purple, Green, Red and Blue) presented in the Application, along
11 with different design options for each of these routes.
12

13 Q. EXPLAIN WHY THE APPLICANTS PRESENTED DIFFERENT DESIGN OPTIONS
14 FOR CERTAIN ROUTES.

15 A. The economic need for the Project, as discussed in Applicants' Certificate of
16 Need Application and in the Direct Testimony of Applicants' witness Mr.
17 Andrew Siebenaler, is based, in part, on a benefit-to-cost ratio formula. As a
18 result, the costs for the Project impact the net economic benefits of the
19 Project. Applicants, therefore, presented not only costs for each route in the
20 Application, but four different structure designs for each route to provide
21 other parties, the Administrative Law Judge, the public, and the Minnesota
22 Public Utilities Commission (Commission) with the information necessary to
23 fully evaluate costs related to both design and route considerations.
24

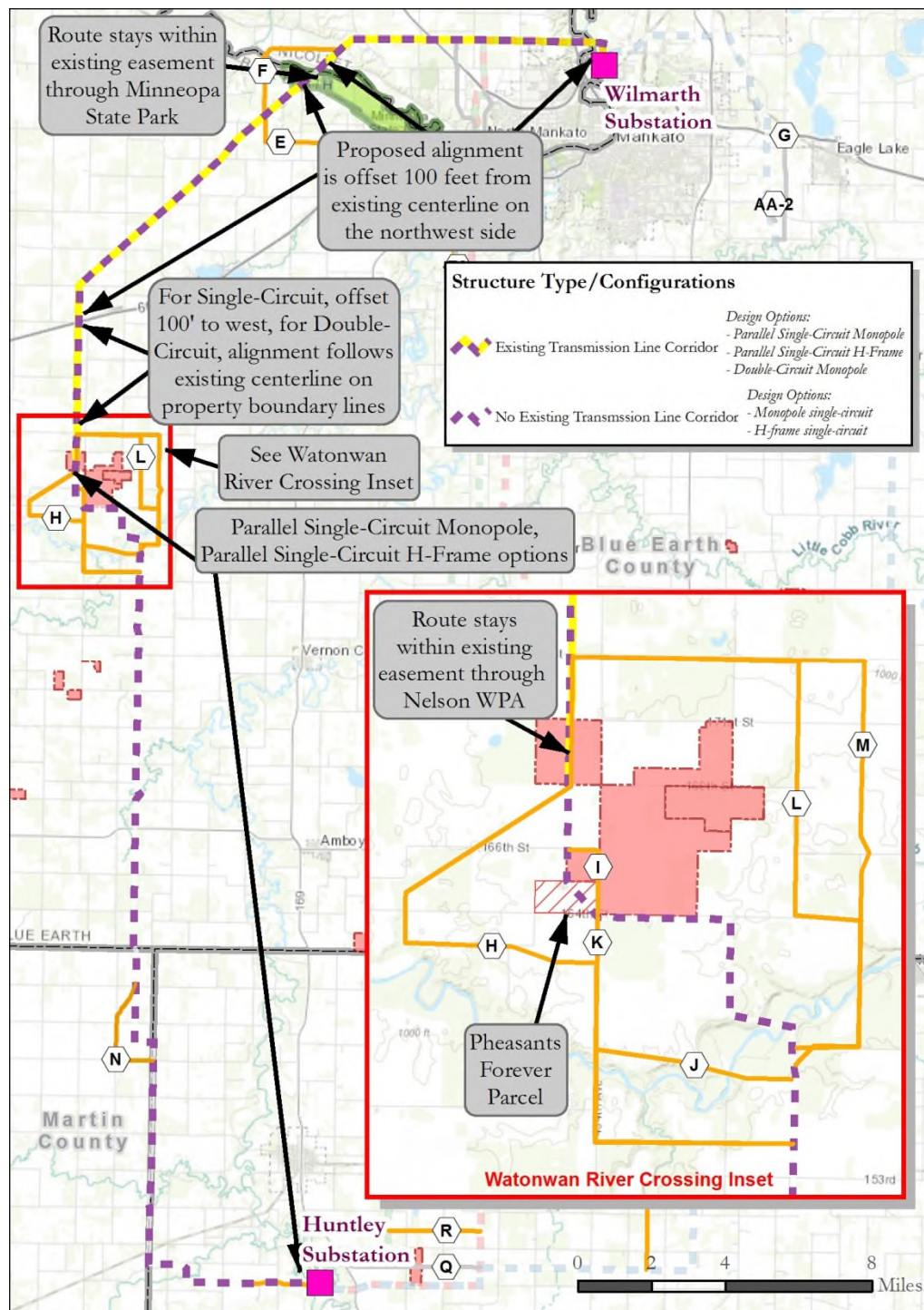
1 Q. CAN YOU DESCRIBE HOW STRUCTURE DESIGN IMPACTS COSTS?

2 A. Yes. While Applicants' witness Mr. Grant Stevenson discusses costs in
3 greater detail, generally speaking, certain types of structures are more
4 expensive than others. For instance, H-frame structures are generally the
5 least expensive type of structures followed by single-pole, single-circuit
6 structures and then single-pole, double-circuit structures. However, while
7 H-frame structures are less expensive they may also have greater impacts to
8 agricultural land due to their two-pole as opposed to single-pole design.
9

10 Q. DESCRIBE THE PURPLE ROUTE.

11 A. The Purple Route is the westernmost route. Starting at the Wilmarth
12 Substation at the north end of the Project, the Purple Route follows an
13 existing 345 kV transmission line for approximately 23 miles of its 52-mile
14 length. After leaving the existing 345 kV transmission line east of the City of
15 Madelia, the Purple Route continues to the south for approximately
16 22 miles, to a point southwest of the City of Huntley, where the Purple
17 Route turns and continues east for five miles to the Huntley Substation. The
18 Purple Route is depicted below in **Figure 1**.
19

Figure 1
Purple Route



1 Q. WHAT ARE THE DESIGN OPTIONS FOR THE PURPLE ROUTE?

2 A. Applicants studied three design options for the Purple Route. Two of the
3 options would construct a new single-circuit line using either H-frame or
4 single pole structures. These options would construct the new line adjacent
5 to the existing transmission line for 22.5 miles except at two discrete
6 locations where double-circuit configuration would be necessary: (1) for
7 approximately one mile of length across the statutory boundary of Minneopa
8 State Park, and (2) across a U.S. Fish and Wildlife Service (USFWS)
9 Waterfowl Production Area (WPA) in section 27, Lincoln Township, Blue
10 Earth County (Lincoln WPA). The third option is a combination of double-
11 circuit and single-circuit monopoles. In this third option, the double-circuit
12 structures would be used for the 23 miles of the Purple Route where it
13 follows the existing 345 kV transmission line. Single-circuit structures would
14 then be constructed under this option from near the City of Madelia to the
15 Huntley Substation.

16
17 Q. ALONG THE PORTIONS OF THE PURPLE ROUTE THAT FOLLOW EXISTING
18 TRANSMISSION LINES, WILL THE NEW LINE BE LOCATED IN THE SAME PLACE
19 AS THE EXISTING LINE?

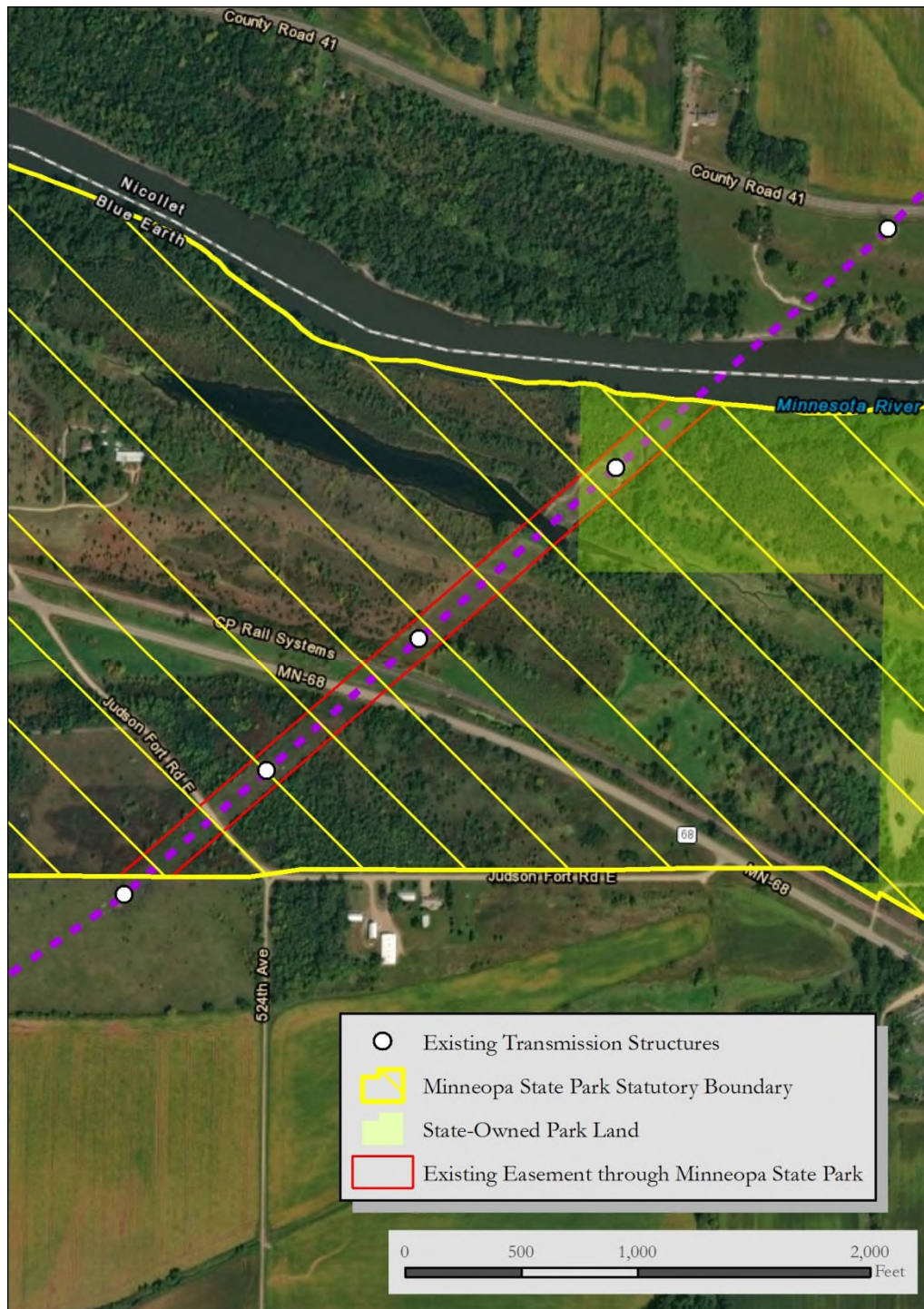
20 A. As shown in **Figure 1** above, in certain locations the alignment for the
21 Project will be offset from the current transmission line alignment. For the
22 northern portion of this route, the Applicants propose to build the new 345
23 kV transmission line adjacent to the existing line on the north and west side.
24 The new 345 kV line would be offset approximately 100 feet from the
25 existing line, measured from centerline-to-centerline. For the double-circuit
26 configuration, the existing line would then be removed when the new line is

1 completed. Because the existing Lakefield Junction – Wilmarth 345 kV
2 transmission line was constructed cross country in the middle of fields,
3 building adjacent to the existing line (and then removing the old line) would
4 not increase permanent impacts to agriculture and allows the new line to be
5 constructed while the existing line remains in service.

6
7 Q. CAN YOU DESCRIBE THE PURPLE ROUTE’S CROSSING MINNEOPA STATE
8 PARK?

9 A. Yes. The Purple Route follows an existing 345 kV transmission line
10 (Lakefield Junction – Wilmarth) through the Minnesota River Valley and
11 crosses 650 feet of Minneopa State Park land and 2,500 feet of private
12 property within the statutory boundary of the state park. The easement for
13 the existing 345 kV transmission line across the Minnesota River Valley pre-
14 dates establishment of Minneopa State Park and provides sufficient rights to
15 construct another 345 kV circuit within its bounds, consistent with the
16 Purple Route proposed by Applicants. Where the Purple Route passes
17 through existing state-owned park land, all construction activities and
18 permanent structures would be contained within this existing 150-foot
19 easement. **Figure 2** below shows the Minneopa State Park crossing for the
20 Purple Route.
21

Figure 2
Minneopa State Park



1 Q. HOW DOES THE DESIGN PROPOSED BY THE APPLICANTS FOR THE MINNEOPA
2 STATE PARK CROSSING MINIMIZE IMPACTS TO THE PARK?

3 A. As I noted above, the new 345 kV line would be co-located with the existing
4 345 kV line on single-pole, double-circuit structures. Only one structure is
5 currently present within the 650 feet of state-owned park land. This existing
6 lattice tower would be replaced with a single pole structure, thereby reducing
7 the footprint within the park. While the new structures within the statutory
8 boundaries of the park (beyond the 650 feet of state-owned park land) will
9 be approximately 35 to 60 feet taller than the existing structures, Applicants
10 plan to install bird diverters along this section of the line to minimize the risk
11 of avian interaction with the new line.

12
13 Q. HAS THE MINNESOTA DEPARTMENT OF NATURAL RESOURCES (MNDNR)
14 REVIEWED THE PURPLE ROUTE'S PROPOSED CROSSING OF MINNEOPA STATE
15 PARK LAND?

16 A. Yes. Based on Applicants discussions with MnDNR and their May 18, 2018,
17 letter, our understanding is that the MnDNR agrees that no License to Cross
18 Public Land would be required for crossing Minneopa State Park land in this
19 location because the Project would utilize an existing unrestricted utility
20 easement acquired in 1971, which predates establishment of the park in this
21 area. However, the Purple Route would require MnDNR to issue a License
22 to Cross Public Waters for the crossing of the Minnesota River. MnDNR
23 recognizes that combining a new line with an existing line rather than
24 creating a new river crossing is an effective way of minimizing impacts to the
25 Minnesota River corridor. MnDNR staff provided a list of conditions in

1 their May 18, 2018, letter that it would recommend if the Commission were
2 to issue a Route Permit for the Purple Route.

3
4 Q. WHAT ARE THE MNDNR'S RECOMMENDED CONDITIONS?

5 A. The MnDNR outlined the following conditions it recommends for inclusion
6 in the Route Permit:

- 7 • Develop a new vegetation management plan detailing how Applicants
- 8 will maintain vegetation within the existing 150-foot easement;
- 9 • Provide an option to cross or use the existing easement for a future
- 10 park trail segment; and
- 11 • Require Applicants to coordinate with the USFWS regarding a bald
- 12 eagle nest near the existing easement and the Minnesota River.

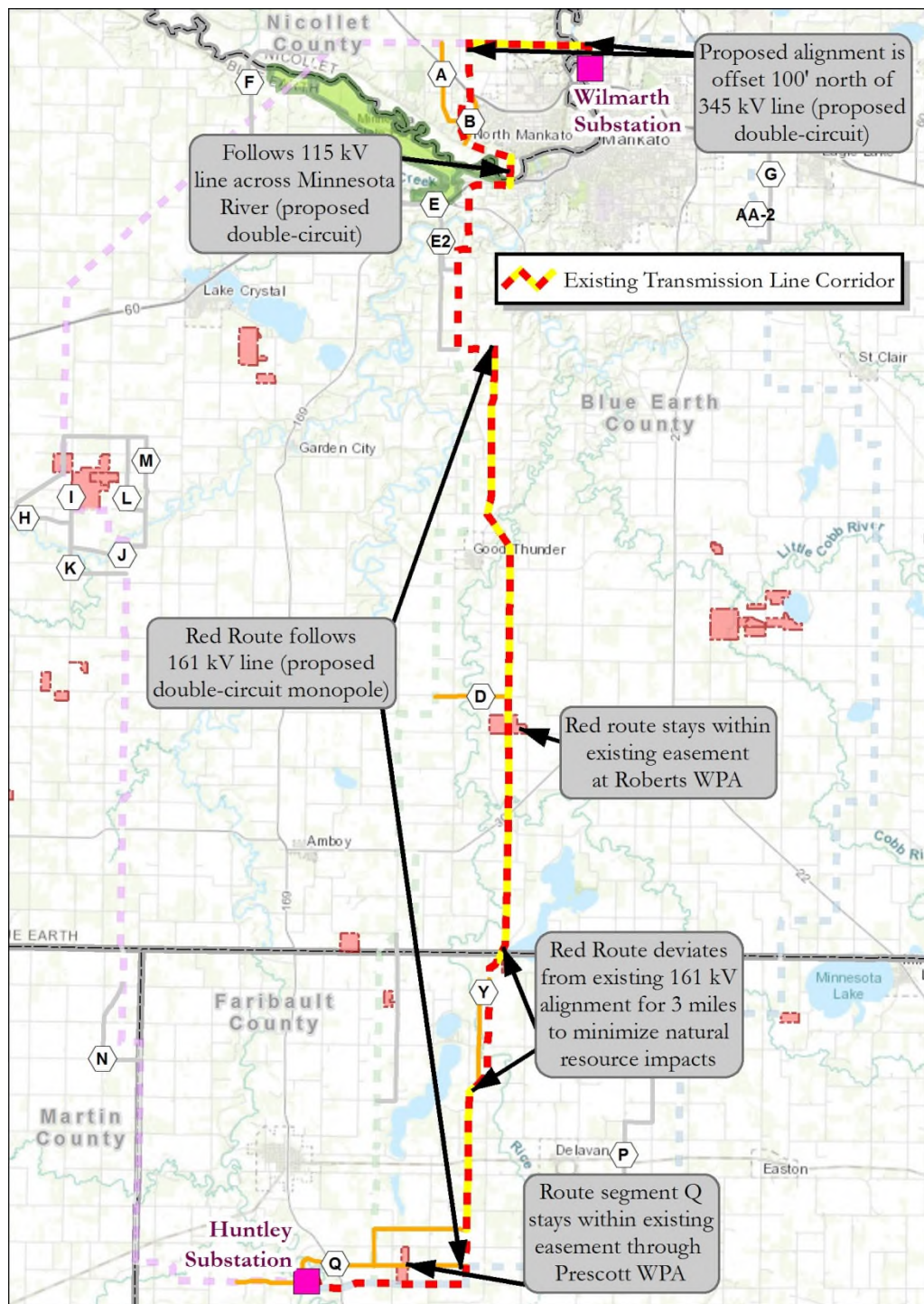
13 The Applicants do not object to any of these conditions.

14
15 Q. DESCRIBE THE RED ROUTE AND THE DESIGN OPTIONS PROPOSED FOR THIS
16 ROUTE.

17 A. The Red Route is approximately 47 miles in length. It exits the Wilmarth
18 Substation and follows the Purple Route (and the existing 345 kV
19 transmission line) for its northernmost four miles. The Red Route turns
20 south around the west side of North Mankato for approximately three miles
21 where it turns east for 1.3 miles along a Minnesota River bluff terrace. This
22 route was developed for purposes of providing a routing alternative that
23 could provide the most direct path to the south while avoiding a crossing of
24 Minneopa State Park. The Red Route crosses the Minnesota River Valley
25 along an existing 115 kV transmission line corridor.

1 At the southern end of the Minnesota River crossing, the Red Route turns
2 west along Highway 169 for approximately one mile where it turns south for
3 approximately 4.5 miles. The Red Route connects with an existing 161 kV
4 transmission line corridor in northern Rapidan Township. The Red Route
5 follows the existing 161 kV line for approximately 28 miles where it then
6 continues south and west for the remaining 2.5 miles into the Huntley
7 Substation. **Figure 3** below depicts the Red Route.
8

Figure 3
Red Route



1 Q. WHAT ARE THE DESIGN OPTIONS FOR THE RED ROUTE?

2 A. Applicants proposed the Red Route to be constructed as a double-circuit
3 configuration where it follows existing transmission lines. There are three
4 segments of the Red Route that follow existing transmission lines: (1) the
5 four northernmost miles where it follows an existing 345 kV transmission
6 line; (2) the Minnesota River Valley crossing where it follows an existing
7 115 kV transmission line; and (3) the southern 28 miles where it follows an
8 existing 161 kV transmission line.

9
10 Q. WHY DID THE APPLICANTS NOT PROPOSE A SINGLE-CIRCUIT
11 CONFIGURATION FOR THE RED ROUTE THAT WAS ADJACENT TO THE
12 EXISTING 28 MILES OF 161 kV LINE?

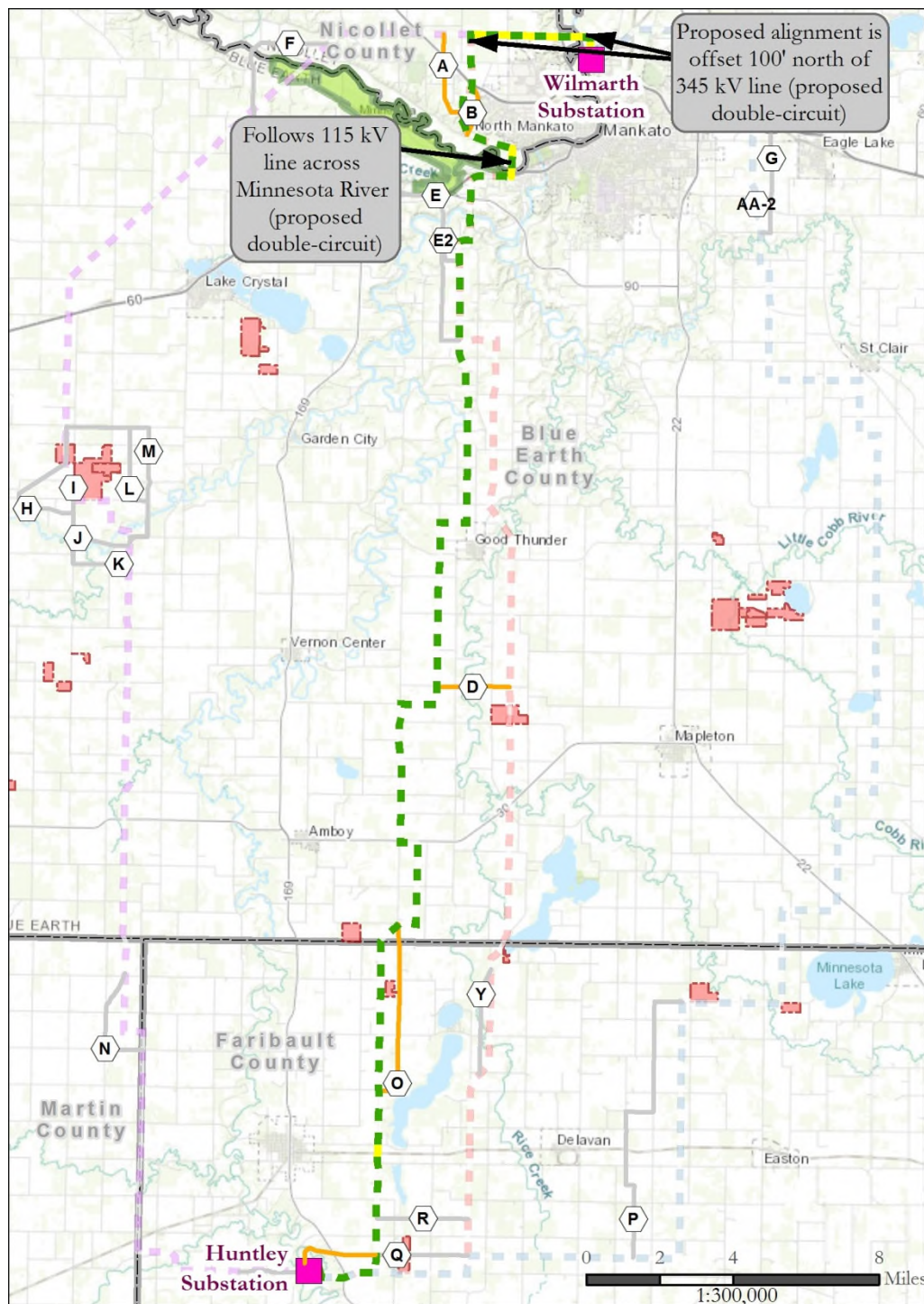
13 A. The existing 161 kV line predominantly follows property lines. An adjacent
14 line would necessarily be placed offset from property lines thereby increasing
15 impacts to agriculture fields. Rather than proposing this configuration,
16 Applicants developed the Green Route which provides a single-circuit route
17 in this same area that can be placed on property lines.

18
19 Q. DESCRIBE THE GREEN ROUTE AND THE DESIGN OPTIONS PROPOSED FOR
20 THIS ROUTE.

21 A. For the first four miles from the Wilmarth Substation, the Green Route is
22 proposed as a single-circuit 345 kV route adjacent to the existing 345 kV
23 Lakefield Junction line. The Green Route then follows the same path as the
24 Red Route for the next 11 miles in the North Mankato, Belgrade Township
25 and South Bend Township areas. The Green Route separates from the Red
26 Route near Rapidan Township and continues southward for 28 miles where

1 it joins up again with the Red Route to the east of the Huntley Substation.
2 The Green Route is depicted below in **Figure 4**.
3

Figure 4
Green Route



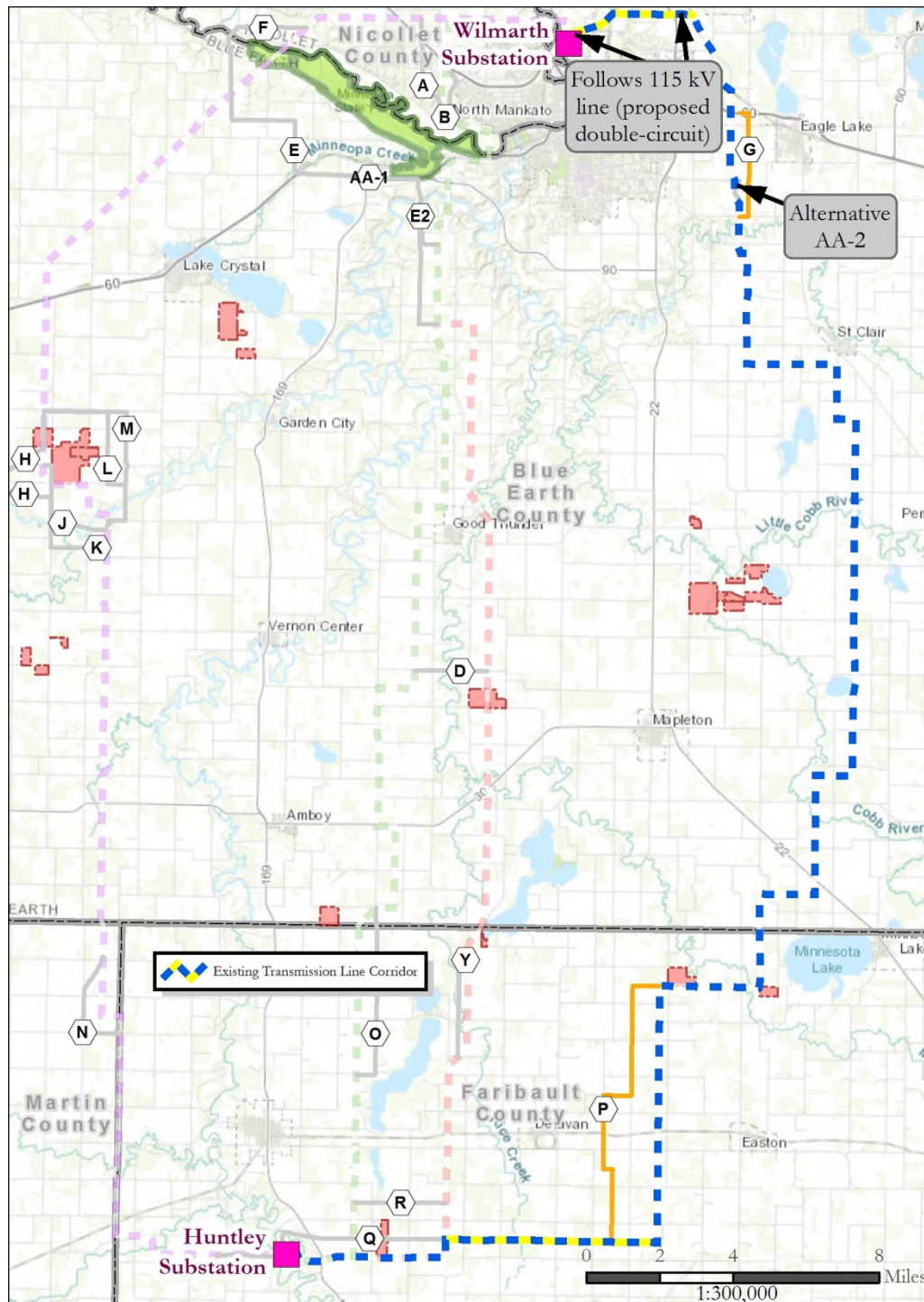
1 Q. WHAT ARE THE DESIGN OPTIONS FOR THE GREEN ROUTE?

2 A. For the Green Route, Applicants proposed two design options: single-
3 circuit, H-frame structures or single-circuit, monopole structures.
4 Applicants proposed single-circuit construction for the Green Route, except
5 where the Green Route crosses the Minnesota River Valley. At this
6 crossing, Applicants proposed double-circuit construction with the existing
7 115 kV transmission line to avoid a new crossing of the Minnesota River.
8

9 Q. DESCRIBE THE BLUE ROUTE.

10 A. The Blue Route is the easternmost route and is approximately 57 miles long.
11 The Blue Route exits the Wilmarth Substation and continues east around the
12 City of Mankato. The Blue Route primarily follows field division lines as it
13 continues south to Barber Township, Faribault County where the Blue
14 Route follows an existing 161 kV transmission line for approximately six
15 miles. The Blue Route then joins the Red Route to the Huntley Substation.
16 Due to its easterly location, the Blue Route avoids crossing the Minnesota
17 River. The Blue Route is depicted below in **Figure 5**.
18

Figure 5
Blue Route



1 Q. WHAT ARE THE DESIGN OPTIONS FOR THE BLUE ROUTE?

2 A. For the Blue Route, Applicants proposed two different design options where
3 it does not follow an existing transmission line: (1) a single-circuit, H-frame;
4 and (2) a single-circuit, monopole. A 3.7-mile segment near the Wilmarth
5 Substation is proposed to be constructed as double-circuit monopole with an
6 existing 115 kV transmission line and a 5.8 mile segment east of the Huntley
7 Substation is proposed to be constructed as double-circuit monopole with an
8 existing 161 kV transmission line.

9
10 Q. DID THE APPLICANTS PROPOSE ANY CHANGES TO THE BLUE ROUTE AFTER
11 THE APPLICATION WAS SUBMITTED?

12 A. Yes, in a March 16, 2018, letter, the Applicants revised the alignment for the
13 Blue Route to avoid a wooded wetland complex east of the City of Mankato.
14 Following submission of the Application, Applicants learned that this
15 wetland is protected by a deed restriction on vegetation removal. Such a
16 restriction is problematic as certain vegetation removal is necessary for the
17 safe construction and operation of the proposed transmission line. Due to
18 this deed restriction, Applicants adjusted the alignment for the Blue Route
19 approximately ¼ mile to the west. A copy of the Applicants' March 16,
20 2018, letter is attached as Exhibit____(TGH-1), Schedule 3, and this revised
21 alignment is shown in **Figure 5** above.

22

1 Q. DID APPLICANTS PROPOSE ANY ADDITIONAL ROUTE ALTERNATIVES IN THE
2 APPLICATION?

3 A. In addition to the four routes I already discussed, Applicants developed six
4 route segment alternatives that provide additional routing options to address
5 major routing constraints in the Project Study Area.
6

7 Q. PLEASE DESCRIBE THE ROUTE SEGMENT ALTERNATIVES INCLUDED IN THE
8 APPLICATION.

9 A. Alternative Segments A and B are route segment alternatives proposed to
10 address issues related to residential proximity and future development raised
11 by the City of North Mankato and Belgrade Township. These route
12 segment alternatives relate to the Green and Red routes. The Green and
13 Red routes, as proposed above, avoid crossing Minneopa State Park but are
14 near the west and south sides of the City of North Mankato in areas pending
15 annexation in Belgrade Township for future residential development.
16 Alternative Segments A and B were proposed to provide routing options for
17 consideration in these areas.
18

19 Alternative Segment C also relates to the Green and Red routes. The route
20 segment alternative reduces land use impacts east of Minneopa State Park
21 and reduces overall Green and Red route length, but would require a new
22 crossing of Minneopa State Park. Given this new crossing, Applicants
23 coordinated with the MnDNR before including this route segment
24 alternative in the Application. The MnDNR was amenable to Applicants
25 including this route segment alternative in the Application, but indicated that
26 it needed more analysis to determine whether it was permissible. In their

1 May 18, 2018, letter, the MnDNR indicated that Alternative Segment C
2 would not be permittable. Based on this determination by the MnDNR, the
3 Minnesota Department of Commerce - Energy Environmental Review and
4 Analysis (DOC-EERA) did not include Alternative Segment C in its scope
5 of analysis for the environmental impact statement (EIS) and the Alternative
6 Segment C has been removed from further consideration.

7
8 Alternative Segment D is an approximately two-mile long segment
9 connecting the Red and Green routes near their midpoint. This connection
10 would allow the use of a combination of Red and Green routes for the
11 Project.

12
13 Alternative Segment E connects the Purple Route, south of the Minnesota
14 River Valley crossing to the Red or Green route. This segment avoids the
15 area west of the City of North Mankato, and would allow the use of a
16 combination of the southern portion of the Red or Green routes with the
17 northern portions of the Purple Route for the Project.

18
19 Alternative Segment F is an alternative segment for the Purple Route that
20 avoids crossing the Minnesota River Valley within the Minneopa State Park
21 by deviating from the existing 345 kV transmission line and creating a new
22 transmission line corridor to the west.

23
24 The route segment alternatives are illustrated on **Figure 1** through **Figure 5**,
25 above.

III. ROUTE ALTERNATIVES INCLUDED IN EIS

Q. WERE ADDITIONAL ROUTE ALTERNATIVES PROPOSED DURING THE SCOPING PROCESS FOR THE EIS?

A. Yes. The Commission's July 17, 2018, scoping decision includes one additional end-to-end route for consideration, as well as 13 route segment alternatives and three alignment alternatives. A map showing all of these alternatives is attached as Exhibit____(TGH-1), Schedule 2.

Q. CAN YOU DESCRIBE THE NEW END-TO-END ROUTE?

A. Yes. This new route is a combination of the Purple and Red routes that are connected by Route Segment E. This new route has been labeled the "Purple-E-Red Route." This route combination was not specifically studied by the Applicants in the Application. However, this route utilizes portions of the Purple Route, Red Route, and Alternative Segment E, all of which were included in the Application. This route begins along the Purple Route, exiting the Wilmarth Substation and then south of the Minnesota River crossing, the route follows Alternative Segment E to the Red Route. The Purple-E-Red Route utilizes the portions of the Purple and Red routes that follow existing transmission line corridors. As a result, this route is the most expensive route under consideration because of the large portion of the route that includes a double-circuit design.

1 Q. CAN YOU DESCRIBE THE NEW ROUTE SEGMENT AND ALIGNMENT
2 ALTERNATIVES FOR THE PURPLE ROUTE?

3 A. Yes. Seven of the route segment alternatives and one of the alignment
4 alternatives contained in the scoping decision are for the Purple Route. Six
5 of the route segment alternatives relate to the area near the Purple Route's
6 crossing of the Watonwan River.

7
8 Q. WHY ARE THERE SIX NEW ROUTE SEGMENT ALTERNATIVES FOR THE PURPLE
9 ROUTE NEAR THE WATONWAN RIVER?

10 A. There are two separate issues that resulted in the addition of these new
11 segments: (1) the area near the Watonwan River contains high value wildlife
12 habitat and (2) there is a parcel of land that is currently owned by Pheasants
13 Forever, and this parcel is in the process of being transferred to USFWS to
14 be added to the existing WPA. The current proposed route for the Purple
15 Route traverses this Pheasants Forever property and is adjacent to the
16 southern boundary of an existing WPA. As the Applicants may be unable to
17 obtain a new transmission line easement across the Pheasants Forever
18 parcel, additional route segment alternatives are proposed for this area. The
19 six new segments provide alternatives to avoid current and future WPA land
20 and cross the Watonwan River at locations that minimize effects to the
21 Watonwan River valley.

22
23 Q. HOW WERE THESE SIX ROUTE SEGMENT ALTERNATIVES RELATED TO THE
24 WATONWAN RIVER DEVELOPED?

25 A. Some of the segment alternatives were proposed during public scoping.
26 Route segments H-M were developed as a result of a field visit conducted by

1 the Applicants and MnDNR in consultation with DOC-EERA. These
2 segments provide different crossing options for the Watonwan River and
3 some avoid crossing the Pheasants Forever parcel.
4

5 Q. HAVE USFWS OR PHEASANTS FOREVER PROVIDED FEEDBACK ON THE
6 FEASIBILITY OF CROSSING THE PHEASANTS FOREVER PARCEL?

7 A. USFWS staff have indicated that they would not support a route through the
8 Pheasants Forever parcel. Applicants understand that USFWS will provide
9 formal comments during the permitting process.
10

11 Q. DO THE APPLICANTS HAVE A PREFERENCE AMONG THESE SIX ROUTE
12 ALTERNATIVES?

13 A. Not at this time. While Applicants no longer support the original Purple
14 Route in this area given the difficulty of obtaining the necessary land rights,
15 each of these six route alternatives is a viable route. These six route
16 segments avoid the Pheasants Forever parcel and also cross the Watonwan
17 River in low-impact areas along a road or at a narrow area of the river valley.
18

19 Q. WHAT OTHER ROUTE SEGMENT ALTERNATIVES ARE PROPOSED FOR THE
20 PURPLE ROUTE?

21 A. On the southern half of the Purple Route, Route Segment N was proposed
22 during scoping to minimize impacts to farmland and follows a drainage
23 ditch. Applicants note that this segment adds approximately 0.6 miles of
24 length, thereby increasing costs, and passes by two additional residences than
25 the comparative portion of the Purple Route.
26

1 Q. WHAT ALTERNATIVE ALIGNMENT WAS PROPOSED FOR THE PURPLE ROUTE?

2 A. Near the Huntley Substation, the Purple Route parallels the new Minnesota
3 to Iowa 345/161 kV line. A landowner proposed Alignment Alternative
4 AA-3 that would triple-circuit the new 345 kV line with the existing
5 345/161 kV line or move the alignment to the south side of 160th Street.
6 Applicants note that the engineering of the Purple Route approach to the
7 Huntley Substation is complex due to a number of existing lines in this area.

8
9 Q. PLEASE DESCRIBE THE NEW ROUTE SEGMENT ALTERNATIVES FOR THE
10 GREEN ROUTE.

11 A. There is only one new segment alternative for the Green Route: Route
12 Segment O. Route Segment O is a five-mile modification of the Green
13 Route to follow County Road 107 rather than property lines. Applicants
14 believe this modification is worthy of study in the EIS and believe that by
15 following a road where there are few residences, the segment provides a
16 good routing option in this area.

17
18 Q. PLEASE DESCRIBE THE NEW ROUTE SEGMENT ALTERNATIVES FOR THE RED
19 ROUTE.

20 A. There is one new segment alternative for the Red Route: Route Segment Y.
21 Route Segment Y was added by the Commission and moves the Red Route
22 to the west to follow an existing 161 kV transmission line corridor in the
23 vicinity of 405th Avenue.

24

1 Q. PLEASE DESCRIBE THE NEW ROUTE SEGMENT ALTERNATIVES AND
2 ALIGNMENT ALTERNATIVES FOR THE BLUE ROUTE.

3 A. There are two route segment alternatives and one alignment alternative for
4 the Blue Route included in the scoping decision. The first route segment
5 alternative is Route Segment G. This segment was suggested by the City of
6 Mankato due to concerns over potential impacts of the proposed
7 transmission line to the Eastwood solar facility. The Blue Route is on the
8 facility's eastern property line and would not have any direct effect on the
9 facility. Route Segment G however follows a segment of County Road 86
10 where approximately 13 homes are present.

11
12 Q. HAVE THE APPLICANTS DISCUSSED THE POTENTIAL FOR IMPACTS WITH THE
13 OWNER OF THE SOLAR FACILITY?

14 A. Yes, Xcel Energy has discussed the original Blue Route alignment with Enel
15 Green Power North America, Inc. (Enel Green Power), the owner of the
16 solar farm facility. Enel Green Power is currently assessing whether
17 shadowing from the proposed transmission structures would have any effect
18 on the facility's production.

19
20 Q. WHAT OTHER ROUTE SEGMENT ALTERNATIVE WAS PROPOSED FOR THE BLUE
21 ROUTE?

22 A. Route Segment P is an alternative near the southern end of the Blue Route
23 and was proposed by a landowner to minimize agricultural impacts. Route
24 Segment P was also suggested to the Applicants prior to filing the
25 Application. This segment was analyzed in the Application (see Appendix E,
26 Page 21). Applicants did not propose this segment because it is a half mile

1 longer and has four houses within 500 feet while the comparable Blue Route
2 Segment has none. The segment also adds four angle structures, thereby
3 increasing cost. The segment does, however, lessen agricultural impacts by
4 following more roads and field divisions.

5
6 Q. DESCRIBE THE ALIGNMENT ALTERNATIVE PROPOSED FOR THE BLUE ROUTE.

7 A. Near the southeast side of the City of Mankato, a landowner proposed a new
8 alignment (Alignment Alternative AA-2) to shift the Blue Route to the west
9 to minimize agricultural and residential impacts.

10
11 Q. DID THE APPLICANTS PROPOSE ANY ROUTE SEGMENT OR ALIGNMENT
12 ALTERNATIVES TO BE STUDIED IN THE EIS?

13 A. Yes. In response to inquiries at task force meetings, the Applicants
14 developed two route segment alternatives (Route Segment Q and Route
15 Segment R) east of the Huntley Substation that could be used for the Green,
16 Red, or Blue routes. These segments, presented in our May 18, 2018,
17 comment letter on the scope of the EIS, provide alternatives for the Red,
18 Green and Blue routes to connect to the Huntley Substation on existing
19 transmission corridors.

20
21 Route Segment Q follows an existing 161 kV line through a WPA.
22 Applicants' assessment of the existing easement is that it is sufficient for the
23 additional line. USFWS staff, however, have informally stated that they do
24 not prefer this route segment. Route Segment R would avoid going through
25 the WPA but could only be used with the Red Route. Both of these

1 segments follow existing transmission lines for the southernmost four to five
2 miles of these routes.

3
4 The Applicants also recommended study of Route Segment E2 as an
5 alternative to Route Segment E that could minimize impacts to residences.
6 Route Segment E2 connects the Red and Green routes at a more northerly
7 location as compared to Route Segment E.

8
9 The Applicants also proposed a route segment to the Purple Route to avoid
10 the Pheasants Forever parcel but this alternative was not included in the
11 scoping decision, as the alternatives that I described above are superior.

12
13 A copy of Applicants' scoping comment letter is attached to my Direct
14 Testimony as Exhibit____(TGH-1), Schedule 4.

15
16 Q. BASED ON THE APPLICANTS' CURRENT ANALYSIS OF THE ROUTES UNDER
17 CONSIDERATION, DO THE APPLICANTS HAVE A PREFERRED ROUTE AT THIS
18 TIME?

19 A. No, the Applicants do not have a route preference at this time. Applicants
20 note that the permitting process is still in its early stages. The EIS has not
21 yet been issued and there are two additional rounds of public comments
22 remaining to be heard. That said, the four route alternatives are each
23 different in terms of their geographic location and their impacts on existing
24 resources and land uses. I will describe the key characteristics of each route
25 and the trade-offs between different types of impacts that each route
26 provides below.

1
2 The most direct routes (Red and Green) must navigate circuitously around
3 the east side of Minneopa State Park resulting in potential impacts to areas
4 planned for development in North Mankato and/or existing residential and
5 agricultural areas of Belgrade Township. South of the Minnesota River, the
6 Red and Green routes provide a choice to consolidate with an existing
7 161 kV line or establish a new corridor. The Red Route provides the
8 opportunity to reduce impacts to agricultural land use from the existing
9 condition because the longer spans of the assumed double-circuit structures
10 would result in fewer structures acting as obstacles for farm equipment.

11
12 The Purple Route provides an opportunity to follow an existing 345 kV
13 transmission line to the west around the Mankato metropolitan area. The
14 Purple Route follows the existing line across the Minnesota River at two
15 locations. The second (western) crossing follows the existing easement
16 through the west end of Minneopa State Park. For the southern 30 miles,
17 the Purple Route would establish a new corridor mostly along property lines
18 in agricultural land. While the majority of the Purple Route would be a new
19 corridor, impacts to farmland would be moderate if the northern portion
20 were double-circuited with the existing line (approximately 75 new structures
21 in fields). If the new line were built as a parallel single-circuit adjacent to the
22 existing line, agricultural impacts would increase (up to 215 new structures in
23 fields).

24
25 The Blue Route travels east around Mankato and therefore avoids the need
26 to cross the Minnesota River. The other three routes must cross the river

1 twice. The Blue Route has impacts to the developed and developing eastern
2 fringe of Mankato including developments that have already been approved.
3 While structure heights would comply with existing limitations of the
4 Mankato Airport, the Blue Route is near the airport and may conflict with
5 future expansion of the airport. The Blue Route would also have a relatively
6 high impact on farmland with as many as 240 new structures placed in farm
7 fields.

8
9 Q. DO THE APPLICANTS HAVE A PREFERRED DESIGN AT THIS TIME?

10 A. No. As noted above, we are still early in the permitting process and the
11 tradeoffs between costs and land use impacts will continue to be studied and
12 commented on as the process moves forward. Applicants will continue to
13 analyze stakeholder input and design information as to the routes and
14 structure designs under consideration.

15
16 **IV. AGRICULTURAL IMPACT MITIGATION PLAN**

17
18 Q. HAVE THE APPLICANTS COORDINATED WITH THE MINNESOTA
19 DEPARTMENT OF AGRICULTURE ON AN AGRICULTURAL MITIGATION PLAN
20 FOR THE PROJECT?

21 A. Yes, Applicants held a meeting with the Department of Agriculture and
22 prepared a draft Agriculture Impact Mitigation Plan. This plan is currently
23 being reviewed by Department of Agriculture Staff, and Applicants plan to
24 provide an update on this plan in Rebuttal Testimony.

1 **V. PUBLIC OUTREACH**

2
3 Q. HAVE THE APPLICANTS CONTINUED PUBLIC OUTREACH SINCE FILING THE
4 APPLICATION?

5 A. Yes, Applicants maintain a notice list of approximately 20,000 landowners
6 and residents in the Project area. Applicants sent a mailing to this list on
7 April 2, 2018, to notify people of the DOC-EERA scoping meetings and to
8 provide a general update on the status of the Project. This mailing was not
9 required and was in addition to the required notice carried out by the DOC-
10 EERA. Applicants also sent a mailing on September 5, 2018 to update
11 landowners and residents about the issuance of the scoping decision and to
12 provide other Project updates. Copies of these two mailings are attached as
13 Exhibit____(TGH-1), Schedule 5.
14

15 Q. DO THE APPLICANTS CONDUCT ANY OTHER TYPES OF PUBLIC OUTREACH?

16 A. Yes. Applicants also maintain a Project website, e-mail address, and phone
17 line. The email and phone line allow the Applicants to continue to be
18 available to members of the public to answer questions about the Project.
19 Since the Application was filed, Applicants have also directed people to the
20 DOC-EERA and Commission staff to submit comments about the Project
21 into the record.
22

23 **VI. CONCLUSION**

24
25 Q. DOES THIS CONCLUDE YOUR PRE-FILED DIRECT TESTIMONY?

26 A. Yes.

Thomas G. Hillstrom

Principal Permitting Agent

Xcel Energy

414 Nicollet Mall, 6th Floor

Minneapolis, Minnesota

Phone (612) 330-5835

thomas.hillstrom@xcelenergy.com

Summary

Experienced Permitting and Siting Professional recognized for effectiveness in rapidly changing and challenging environments. Known for demonstrated problem-solving, project management, communication skills, innovative and progressive approaches, and integrity. Proven track record of successfully completed major projects

Areas of expertise:

- Leadership and teamwork
- Communications
- Electric Transmission Design
- Multi State Regulatory Expertise
- Project Management
- Reporting and Presentation

Professional Experience

Principal Permitting Agent, Xcel Energy

February, 2016 to Present

- Lead siting and permitting efforts for new high voltage transmission lines in Minnesota, South Dakota and North Dakota. Facilitate team oriented strategy development for large siting projects. Provide expertise in constructability, scheduling and regulatory issues. Present complex technical information to stakeholders with varying levels of industry knowledge. Prepare presentations, status reports and present updates to project team, stakeholders and executive leadership.

Sparrow Consulting, LLC (Self-Employed)

April, 2013 to February, 2016

- Consulted for Utility Companies on electric transmission projects. Managed siting and permitting efforts for new high voltage transmission lines including a proposed 345 kV transmission line in South Dakota, providing project guidance for an Iowa/Wisconsin 345kV project and managing compliance for another 345 kV transmission line in Minnesota/North Dakota.

Environmental Manager, Metropolitan Council

August, 2012 to April, 2013

- Managed environmental review process for the Southwest Light Rail Project. Oversaw competitive solicitation process for various consultants and contractors. Provided environmental permitting feasibility input to design team.

Permitting Supervisor, Xcel Energy

2004 to August, 2012

- Led siting and permitting efforts for new high voltage transmission lines. Acted as the lead permitting manager and spokesperson for the CapX 2020 Hampton-Rochester-La Crosse 150 mile 345kV interstate transmission project. Appeared as permitting and siting witness in contested case hearings. Developed public and agency outreach strategy and acted as primary contact point for all agency and public interactions. Worked with regulatory and legislative staff to assess state policy direction and identify rule and statute challenges in implementing proposed projects.

Associate, SRF Consulting Group

1997 to 2004

- **Project Facilitation** – Coordinated environmental review and permitting for transportation projects including Federal EIS preparation. Prepared proposals including cost estimates, scope and methods. Presented results of technical studies to regulatory agencies and project proposers. Organized and attended meetings, presented and interpreted results of environmental studies. Applied for permits and negotiated permit conditions with regulatory agencies.
- **Management** – Supervised staff of environmental scientists. Prepared proposals, prepared and monitored budgets, assigned and scheduled work. Reviewed documents for quality control.
- **Environmental Studies** – Analyzed environmental impacts resulting from proposed projects.

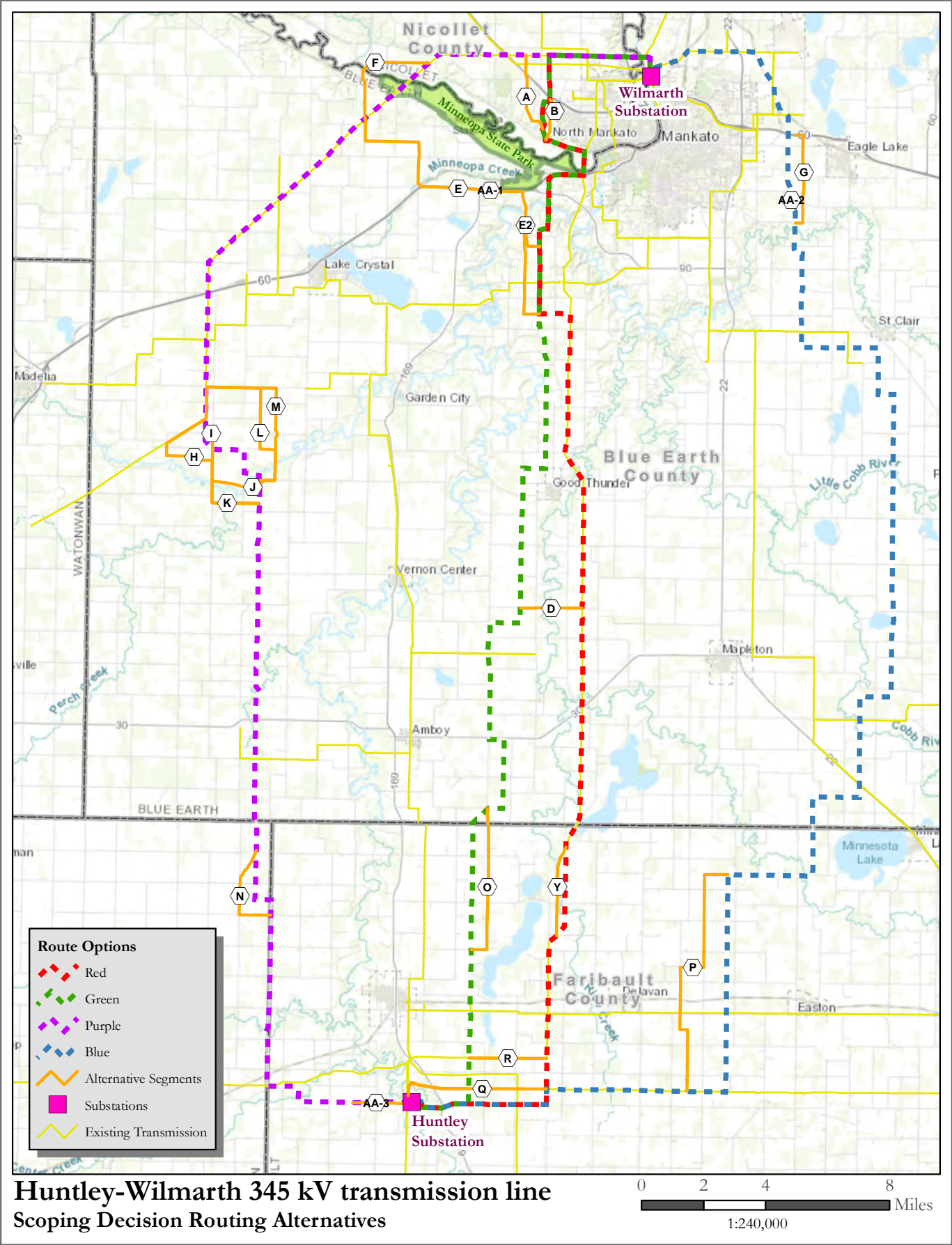
Project Manager, Nova Environmental Services

1993 to 1997

- **Site Investigation and Remediation** – Managed projects involving soil and ground water investigation and clean-up. Designed and implemented corrective action plans. Supervised staff of field technicians. Prepared project budgets, proposals and safety plans. Hired and administered subcontractors. Acted as client liaison to regulatory agencies.
- **Wetlands** – Performed wetland delineations and prepared wetland mitigation plans.
- **Health And Safety** – Prepared and instructed hazardous waste operations training course.

Education

- Bachelors of Science, Biology, University of Minnesota
- Ongoing Career Development
 - Planned and participated in trade group seminars
 - Week-long training in Brooks Act competitive procurement process
 - Self-directed study of teamwork and social psychology
- Technical learning through Independent Study and Courses in Electric Utilities and Electric Transmission





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March 16, 2018

--Via Electronic Filing--

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 APPLICATION TO THE MINNESOTA PUBLIC UTILITIES
COMMISSION FOR A ROUTE PERMIT FOR THE HUNTLEY-WILMARTH 345 kV
TRANSMISSION LINE PROJECT
DOCKET NO. E002, ET6675/TL-17-185
Blue Route Alignment

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, and ITC Midwest LLC (collectively, Applicants) respectfully make this filing to notify the Minnesota Public Utilities Commission, the Department of Commerce, and impacted landowners of Applicants' request to include an additional alignment for the Blue Route for consideration and study in the Environmental Impact Statement (EIS). The Blue Route was one of the four routes proposed by the Applicants in their Route Permit Application for the Huntley-Wilmarth 345 kV Transmission Line Project filed on January 22, 2018.

After the filing of the Route Permit Application, Applicants learned that the wetland crossed by the proposed alignment for the Blue Route east of the City of Mankato has special protections (see Figure 1). Both the Minnesota Department of Transportation (MNDOT) and the City of Mankato have indicated that this wetland is protected by a deed restriction that prohibits any vegetation removal. Such a restriction is problematic as certain vegetation removal is necessary for the safe construction and

operation of the proposed transmission line. While Applicants are still in the process of verifying the specific terms and conditions of this deed restriction, based on the information provided by MNDOT and the City of Mankato, Applicants believe that the Blue Route original alignment presented in the Route Permit Application is incompatible with the vegetation restrictions on this wetland area.

In addition to wetland impacts, the City of Mankato also expressed concerns regarding the impacts of the Blue Route's original alignment on proposed developments and the Eastwood solar facility (shown on Figure 1). To avoid the wetland area and proximity to these planned developments, Applicants developed a new alignment that is ¼ mile to the west of the original alignment. The new alignment is mostly within the proposed route width but would require a small expansion of the Blue Route. The proposed new alignment and expanded route width are also shown on Figure 1.

Applicants request that this new alignment within an expanded Blue Route be studied in the EIS and have provided a summary routing criteria analysis for this new alignment as compared to the original alignment in Attachment A.

A copy of this letter is being mailed to the affected landowners whose property is within 500 feet of this new alignment.

If you have questions or need additional information, please contact either Tom Hillstrom, Principal Permitting Agent, at thomas.g.hillstrom@xcelenergy.com or 612-330-5835, or Tim Tessier, Manager-Regulatory Strategy, at ttessier@itctransco.com or 515-282-5300 ext. 455.

SINCERELY,

/s/

TOM HILLSTROM
PRINCIPAL PERMITTING AGENT
NORTHERN STATES POWER COMPANY
DBA XCEL ENERGY

/s/

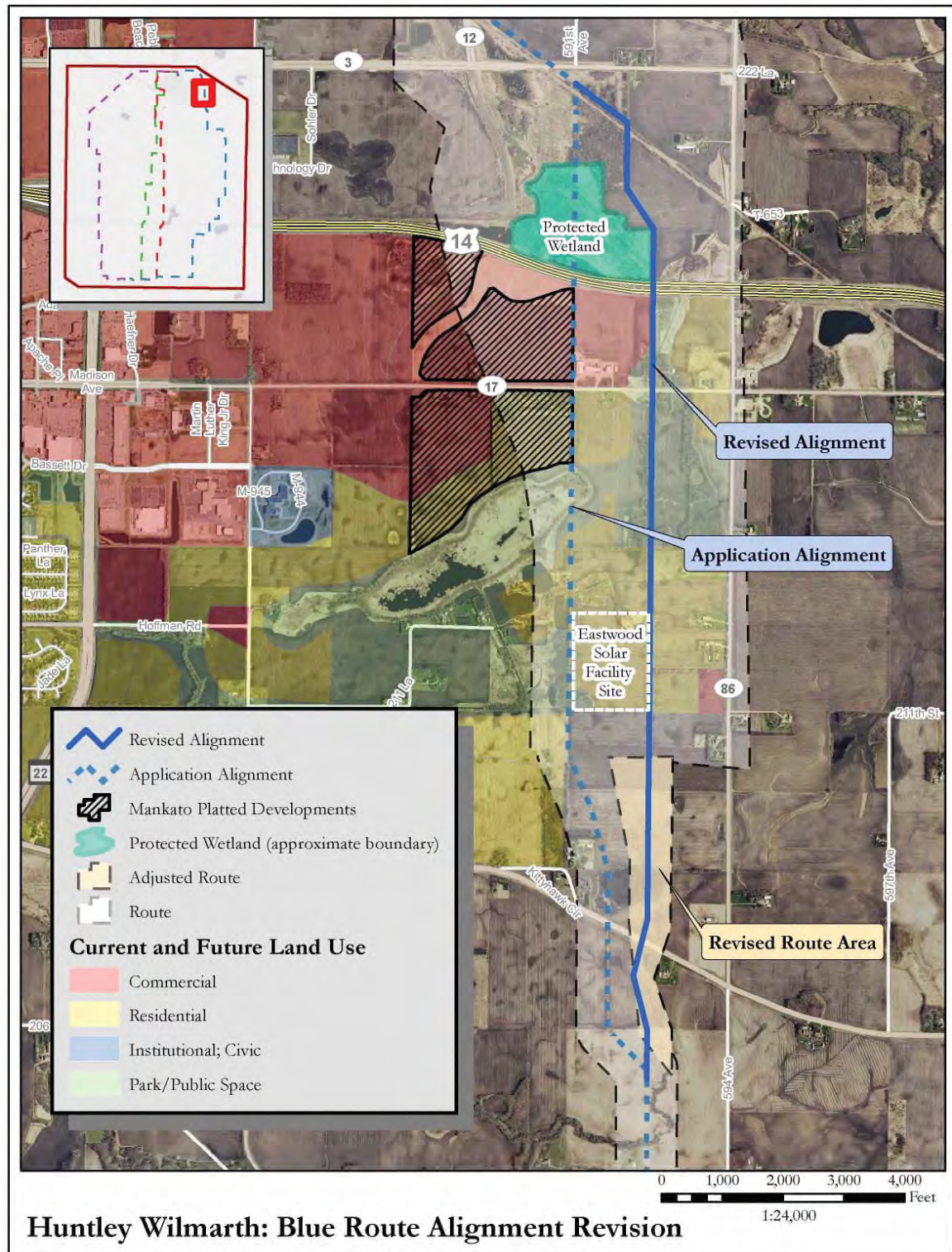
TIM TESSIER
MANAGER-REGULATORY STRATEGY
ITC MIDWEST LLC

cc: Service List
Affected Landowners
Trisha DeBleeckere, Minnesota Public Utilities Commission
Ray Kirsch, Department of Commerce

Attachment A: Blue Route Adjustment Comparison

Criterion	Blue Route - Application Alignment	Blue Route- New Alignment
Total Route Length (miles)	3.18	3.22
Agricultural Impact – range of new structures placed in agricultural fields (approximate number)	2 (monopole)- 13 (H-frame)	4 (monopole)- 15 (H-frame)
Length through Future Development (miles)	Industrial: 0.41 Commercial: 0.31 Open Space: 1.4 Park: 0.42 Residential: 0.7	Industrial: 0.16 Commercial: 0.13 Open Space: 1.6 Park: 0.63 Residential: 0.51
Residences within 300 feet (number)	0	1
Railroad Corridor Sharing (percent)	0	6.25%
Parks, Native Plant Communities, and Sites of High Biodiversity Significance crossed (number)	1 (protected wetland)	0
Waterbodies Crossed (number)	1	2
Structures within Wetlands (number)	6	5
Upland Forest in ROW (acres)	2.0	0.6
Wetland Forest in ROW (acres)	5.7	11

FIGURE 1



CERTIFICATE OF SERVICE

I, Lynnette Sweet, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

Docket Nos. E002, ET6675/TL-17-185

Dated this 16th day of March 2018

/s/

Lynnette Sweet
Regulatory Administrator

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New Blue Route Alignment Landowners

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ALLIANCE PIPELINE INC	800 605-5 AVENUE SW	CALGARY	AB	T2P 3-H500	
BLUE EARTH COUNTY	PO BOX 8608	MANKATO	MN	56002	8608
BOHNERT RODNEY W & JULIE A	21260 594TH AVE	MANKATO	MN	56001	8533
BORGMEIER ROGER R & PATRICIA E TRUSTS	23195 583RD AVE	MANKATO	MN	56001	7523
BORGMEIER ROGER R & PATRICIA E TRUSTS	23195 583RD AVE	MANKATO	MN	56001	7523
BRENNER DALE H	22875 STATE HIGHWAY 22	MANKATO	MN	56001	7525
BRENNER ODELLA A	22875 STATE HIGHWAY 22	MANKATO	MN	56001	7525
DAKOTA, MN & EASTERN RR CO	120 S 6TH ST	MINNEAPOLIS	MN	55402	1803
GOETTL FAMILY REVOCABLE LIV TR	21208 594TH AVE	MANKATO	MN	56001	8533
GOETTL JAMES F	22054 594TH AVE	MANKATO	MN	56001	8505
GOETTL JOSEPH R & VICTORIA L REV TRUSTS	18995 JASMINE RD	MANKATO	MN	56001	6664
GOETTL LAVERN F & JOAN MARY	59223 N VICTORY DR	MANKATO	MN	56001	8551
GOETTL RALPH F & RITA V (LE)	18995 JASMINE RD	MANKATO	MN	56001	6664
GOETTL TERRY & BLOCK CATHERINE	124 TYLER AVE	NORTH MANKATO	MN	56003	2246
GROH FAMILY LTD PARTNERSHIP	1135 W 6TH ST	LOVELAND	CO	80537	5344
HINIKER DANIEL G & KAROLYNN B	22418 LYNX RD	MANKATO	MN	56001	8546
HOPKINS LAYNE V & KAREN L	21052 594TH AVE	MANKATO	MN	56001	8543
JAVENS JEAN E	20009 589TH AVE	MANKATO	MN	56001	8479
JAVENS KENNETH L & JODY J	23544 589TH AVE	MANKATO	MN	56001	7509
JAVENS PROPERTIES LLC	20009 589TH AVE	MANKATO	MN	56001	8479
MANGULIS MATTHEW G & JENNIFER	21304 594TH AVE	MANKATO	MN	56001	8528
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SEIFERT TIMOTHY N & LISA A	58989 211TH LN	MANKATO	MN	56001	8517
SHANKLIN THOMAS J & SUSAN G	59172 KITTYHAWK CIR	MANKATO	MN	56001	8509
STATE OF MINNESOTA	500 LAFAYETTE RD N	SAINT PAUL	MN	55155	4002
TACHENY CLETUS & CHRISTINE TRUST	10044 POWERS LAKE CIR	WOODBURY	MN	55129	8579
TACHENY THOMAS J & LAURIE A (CFD)	59122 KITTYHAWK CIR	MANKATO	MN	56001	8509
TURTLE FAMILY TRUST FUND	18 MCINTOSH DR	NEW ULM	MN	56073	3352
WEAVER GEORGE & MARGARET	47580 STATE HWY 13	WATERVILLE	MN	56096	
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May 18, 2018

VIA E-FILING AND U.S. MAIL

Ray Kirsch, Environmental Review Manager
Minnesota Department of Commerce
85 7th Place East, Suite 500
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

DOCKET NOS. E-002,ET-6675/CN-17-184 AND
E-002,ET-6675/TL-17-185

ENVIRONMENTAL IMPACT STATEMENT SCOPING COMMENTS

Dear Mr. Kirsch:

Northern States Power Company, doing business as Xcel Energy, and ITC Midwest LLC (collectively, Applicants) provide the following comments on the scope of the Environmental Impact Statement (EIS) being prepared for the Huntley – Wilmarth 345 kV Transmission Line Project (Project).

Applicants propose four additional route segments. These new route segments are shown on **Figures 1-3** that are attached to this letter. The Applicants request that these alternative route segments be included in the scope of the EIS for further study and evaluation.

1. Purple Route – Alternative Route Segment to Avoid Potential Federal Refuge

Applicants recently learned that a parcel crossed by the Purple Route is currently owned by Pheasants Forever and is in the process of becoming a Waterfowl Production Area (WPA) within the Minnesota Valley Federal Refuge system. If the

Purple Route were approved and this land transferred to Federal ownership (i.e., United States Fish and Wildlife Service (USFWS)), prior to construction of the Project, it would be unlikely that Applicants could acquire a new right-of-way across this parcel. Applicants therefore request that an alternative route segment be added to the Purple Route to avoid this parcel if necessary. This proposed alternative route segment is shown on **Figure 1** attached to this letter. Applicants will be approaching Pheasants Forever and USFWS to discuss obtaining an easement option on the Pheasants Forever parcel prior to transfer to the USFWS.

2. Red, Green, and Blue Routes – Two Alternative Route Segments East of Huntley Substation

Based on inquiries during the advisory task force meetings, Applicants re-examined routing alternatives heading east from the Huntley Substation. Based on this re-examination, Applicants propose two alternative route segments near the Huntley Substation.

The first proposed alternative route segment exits the Huntley Substation to the north and follows an existing 161 kV transmission line east. Applicants did not include this segment in the Route Permit Application because of the congested corridor north of the Huntley Substation (five transmission circuits already in place here) and a preference to avoid the WPA in this area. Applicants recently re-examined the transmission corridor exiting the Huntley Substation to the north and believe this corridor could be expanded with a sixth circuit for 1/3 of a mile north where the new segment would turn east and follow an existing 161 kV line for approximately 4.5 miles. This proposed alternative route segment includes a crossing of a WPA if it is used for either the Blue or Red Route. ITC Midwest has an existing easement across the WPA property for transmission line purposes that predates the establishment of the WPA. Applicants are evaluating the scope of the easement and intend to consult with USFWS to fully assess whether the easement will allow replacement and construction of larger structures for the Huntley-Wilmarth 345 kV line. Applicants will provide additional information into the record when that analysis is complete.

Applicants also propose an additional route segment alternative that avoids the WPA if the Red Route were approved. This second alternative route segment follows an existing 161 kV connecting the Red Route to the Green Route to avoid the WPA. Both of the proposed alternative route segments near the Huntley Substation are shown on **Figure 2** attached to this letter.

3. Alternative Segment E – Alternative Route Segment

Applicants propose a new alternative route segment to Alternative Segment E to allow a different route option that would provide the opportunity to maximize the distance between the proposed transmission line and residences and to accommodate landowner preferences. If Alternative Segment E is included in an approved route, Applicants would work with landowners in the new route area to determine a proposed alignment to connect this new alternative route segment to the Red and Green Routes. Applicants request that this new alternative route segment shown in **Figure 3** attached to this letter be included in the scope of the EIS for further analysis.

If you have questions or need additional information, please contact either Tom Hillstrom, Principal Permitting Agent, at thomas.g.hillstrom@xcelenergy.com or 612-330-5835, or Tim Tessier, Manager-Regulatory Strategy, at ttessier@itctransco.com or 515-639-3327.

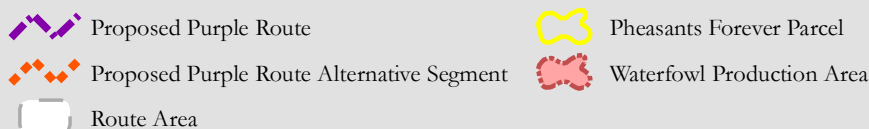
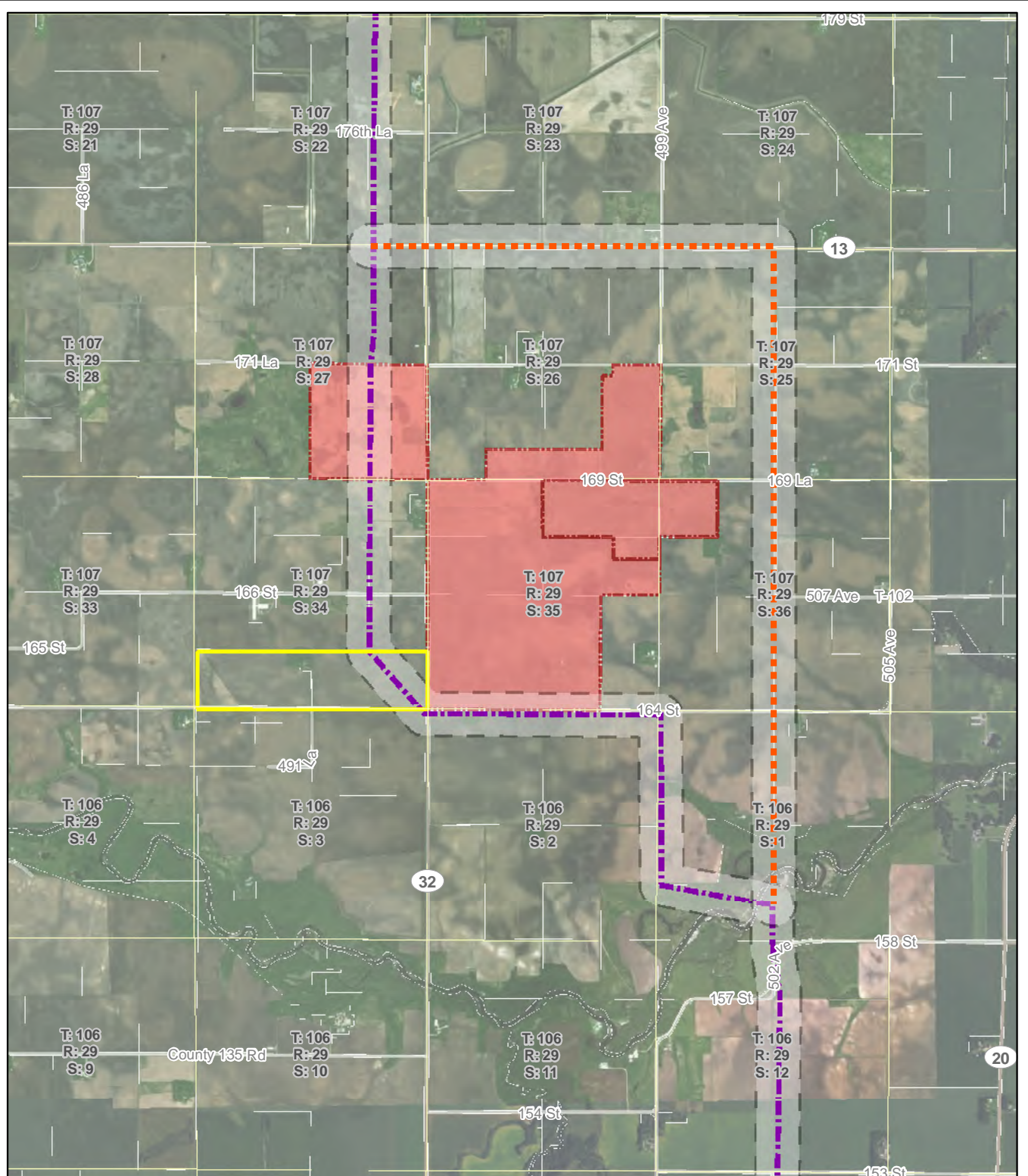
SINCERELY,

/s/

TOM HILLSTROM
PRINCIPAL PERMITTING AGENT
NORTHERN STATES POWER COMPANY
DBA XCEL ENERGY

/s/

TIM TESSIER
MANAGER-REGULATORY STRATEGY
ITC MIDWEST LLC



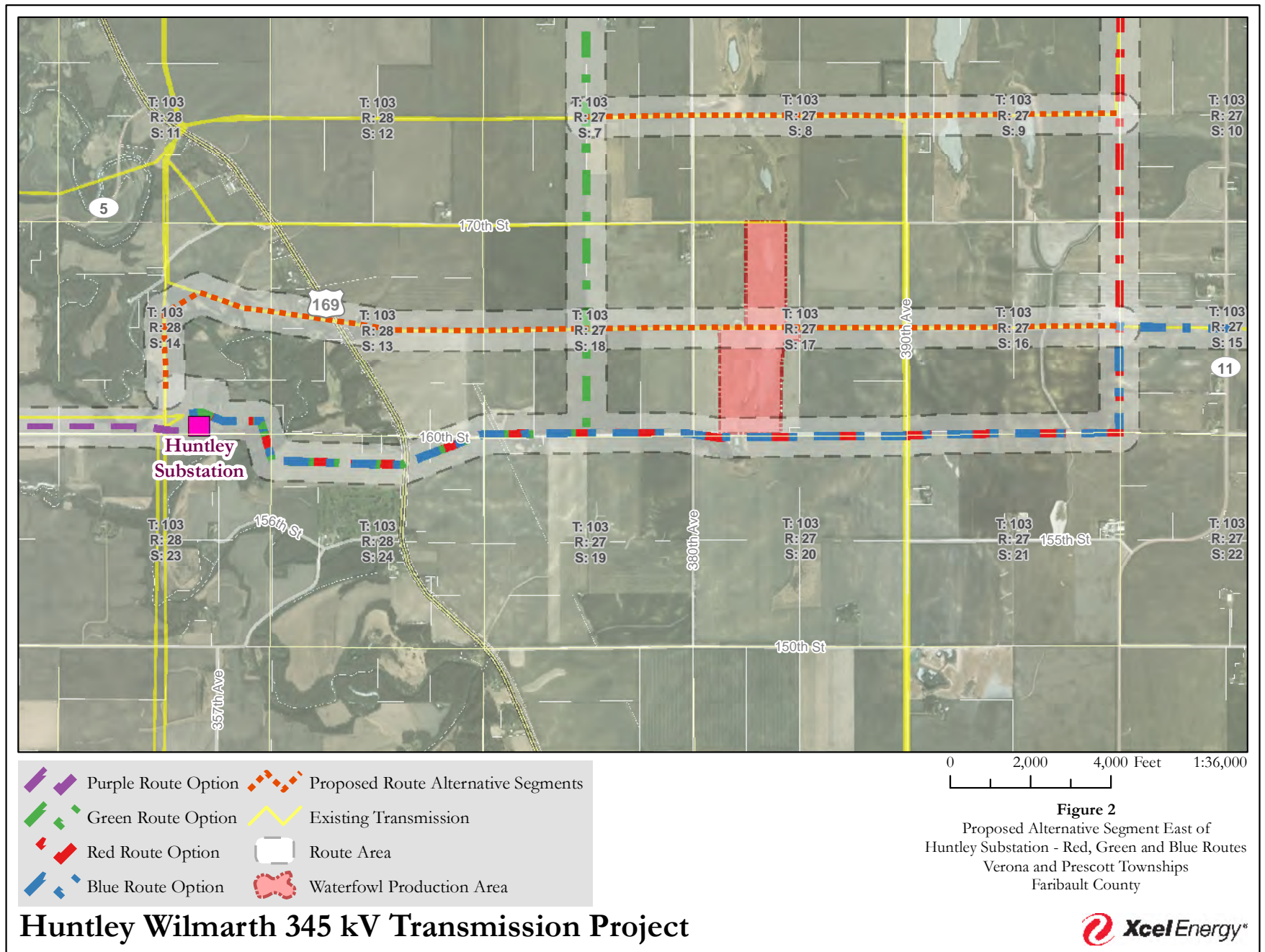
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Figure 1

Proposed Purple Route Alternative Segment
 Lincoln and Ceresco Townships
 Blue Earth County

Huntley Wilmarth 345 kV Transmission Project







CERTIFICATE OF SERVICE

I, Carl Cronin, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

Docket Nos. E002, ET6675/CN-17-184, and E002,ET6675/TL-17-185

Dated this 18th day of May 2018

/s/

Carl Cronin
Regulatory Administrator

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Byron E.	Starns	byron.starns@stinson.com	Stinson Leonard Street LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-184_Official Service List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Todd	Tadych	ttadych@atdlc.com	American Transmission Company LLC	5303 Fen Oak Dr Madison, WI 53718	Electronic Service	No	OFF_SL_17-184_Official Service List
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Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_17-185_Official Service List
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Todd	Tadych	ttadych@atdlc.com	American Transmission Company LLC	5303 Fen Oak Dr Madison, WI 53718	Electronic Service	No	OFF_SL_17-185_Official Service List
Steve	Thompson	stevet@cmpasgroup.org	Central Minnesota Municipal Power Agency	459 S Grove St Blue Earth, MN 56013-2629	Electronic Service	No	OFF_SL_17-185_Official Service List
Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_17-185_Official Service List
Paul	Vogel	pvogel@mankatomn.gov	City of Mankato, MN	10 Civic Center Plaza Mankato, MN 56001	Electronic Service	No	OFF_SL_17-185_Official Service List
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Huntley-Wilmarth 345 kilovolt transmission line project update

State Agencies to Hold Public Meetings on April 17 and 18

Xcel Energy and ITC Midwest LLC are proposing to build a 345 kilovolt (kV) transmission line in southern Minnesota. The transmission line would connect Xcel Energy’s Wilmarth Substation, north of Mankato, and ITC Midwest’s Huntley Substation, south of Winnebago (view map on back). The Minnesota/Iowa border is one of the most congested areas in the region’s electric system. The Huntley-Wilmarth project is needed to relieve this congestion and enable low-cost electric generation to reach customers in the region. If approved, the projected in-service date for the project is the end of 2021. The Minnesota Public Utilities Commission and Minnesota Department of Commerce are hosting public scoping meetings on April 17 and 18. More details on the time and locations are included below.

Contact Us

To learn more about the project and view detailed maps, please visit our project website at huntleywilmarth.com. You can contact us by calling our toll-free number 1.855.839.8865 or by sending an email to huntleywilmarth@xcelenergy.com.



Project Benefits

The Huntley-Wilmarth project will provide several local and regional benefits including:

- Relieving congestion on the transmission grid
- Increasing transmission capacity to deliver low-cost energy to customers
- Supporting new generation development, including renewable energy
- Increasing property tax revenues for local governments

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Minneapolis, MN 55401

State Public Scoping Meetings

April 17

1 PM & 6 PM
Courtyard by Marriott Event Center
901 Raintree Road
Mankato, MN 56001

April 18

1 PM
Winnebago Municipal Center
140 Main Street South
Winnebago, MN 56098

April 18

6 PM
Maple River High School (gym)
101 6th Avenue Northeast
Mapleton, MN 56065

State Permitting

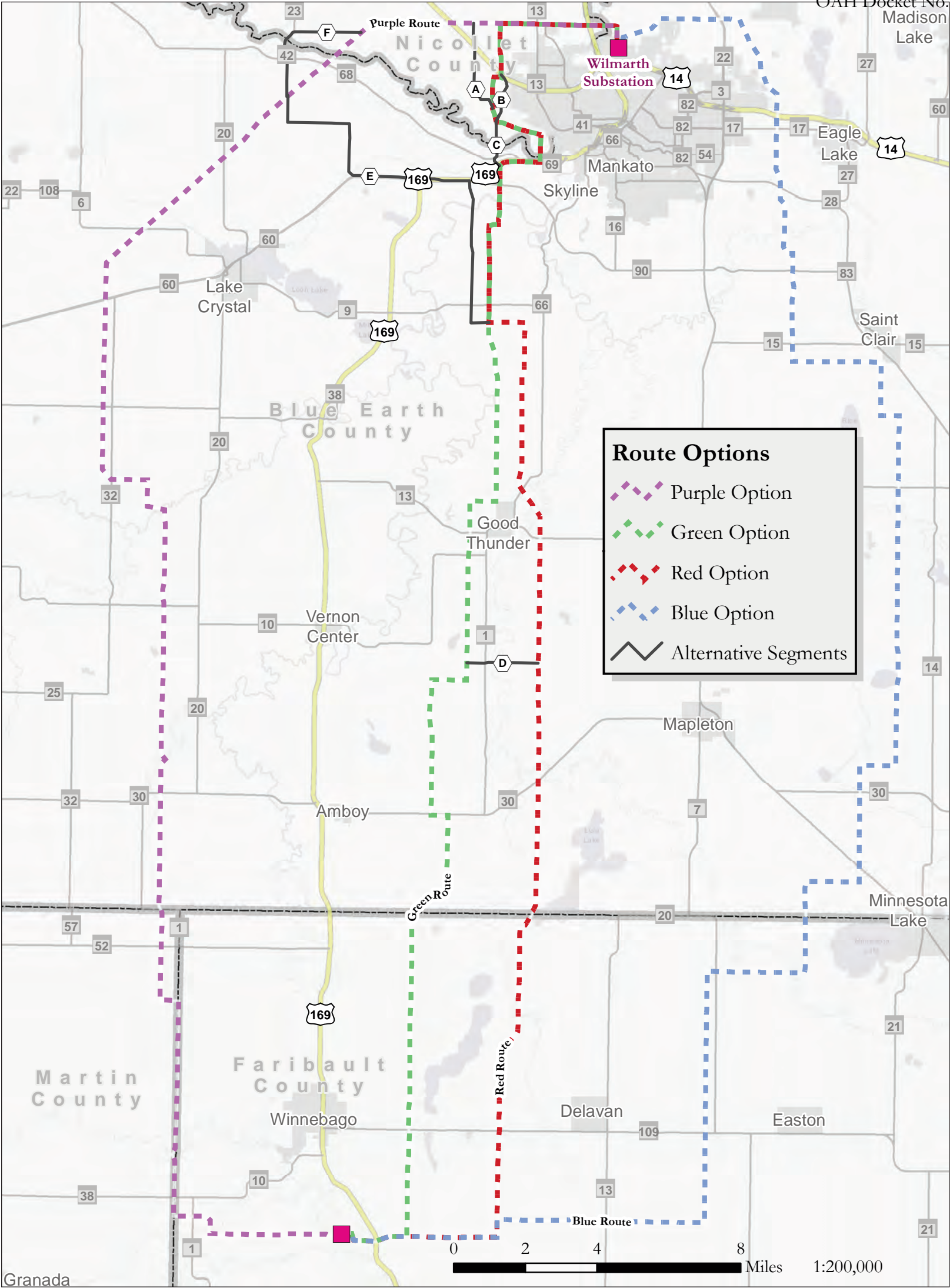
The Huntley-Wilmarth project requires two approvals from the Minnesota Public Utilities Commission (Commission) – a Certificate of Need and a Route Permit. Both applications were filed with the Commission in January 2018, and the Commission voted to find the applications complete in March 2018.

The Commission will determine whether the project is needed and, if it is needed, the route for the project. To help the Commission make these decisions, there will be several opportunities for public comment and dialogue, including public meetings and public hearings.

The Commission and the Minnesota Department of Commerce (Department) are hosting public information and scoping meetings on April 17 and 18. The purpose of these meetings is to provide citizens with information about the state permitting process and the project, and to gather comments on the impacts and mitigation measures that should be studied in the environmental impact statement (EIS) that will be prepared by the Department. The meetings will include a short presentation and time for citizens to ask questions and provide comments. The same information will be presented at all meetings. Public comments will be accepted by the Department through May 4, 2018. For more information on how to comment, see the public meeting notice on the Department’s website: <http://mn.gov/commerce/energyfacilities>.



Huntley-Wilmarth Preliminary Route Options



Permitting Schedule (subject to change)

Certificate of need and route permit applications submitted to Commission	January 2018
Informational and scoping meetings (public meetings and comment period)	April 2018
Draft environmental impact statement issued (public meetings and comment period)	Middle 2018
Public hearings (public hearings and comment period)	Second Half 2018
Commission decision	First Half 2019

Contact Us

To learn more about the project and view detailed maps, please visit our project website at huntleywilmarth.com. You can contact us by calling our toll-free number 1.855.839.8865 or by sending an email to huntleywilmarth@xcelenergy.com.

Huntley-Wilmarth Transmission Line Project Update

SEPTEMBER 2018 MAILING
Exhibit____(TGH-1) Schedule 5
MPUC Docket No. E-002, ET6675/CN-17-184
MPUC Docket No. E-002, ET6675/TL-17-185
OAH Docket No. 82-2500-35157
Page 3 of 4

SCOPING DECISION ISSUED – ADDITIONAL ROUTE SEGMENTS ADDED

On July 17, 2018, the Minnesota Department of Commerce issued the scoping decision for the environmental impact statement (EIS) that will be prepared for the Huntley-Wilmarth project. The scoping decision describes the routing alternatives that will be analyzed in the EIS. The scoping decision is based on public comments received at the four public meetings held in the project area in the spring and a public comment period.

The map inside depicts the routing alternatives being studied in the EIS. You can view more detailed maps on the project website: huntleywilmarth.com. You can also view detailed maps on the Department of Commerce’s website: mn.gov/commerce/energyfacilities.

Permitting Process – Public Involvement

There will be several more opportunities for public comment and dialogue, including public meetings and public hearings. The draft EIS will be published

in December 2018. Public meetings concerning the draft EIS will be held in January 2019. Public hearings will also be held in the project area in early 2019. Landowners will receive notice of public meetings and hearings when the dates are finalized. The Huntley-Wilmarth project requires two approvals from the Minnesota Public Utilities Commission (Commission), a certificate of need and a route permit. The Commission will determine whether the project is needed and, if it is needed, the route for the project. Commission decisions on the project are anticipated in summer 2019.

All project documents are available on the Commission’s eDockets website: <https://www.edockets.state.mn.us/EFiling/search.jsp>. Select “17” in the year field and enter “184” in the number field for the certificate of need or “185” in the number field for the Route Permit. Then click on “search.” Project documents are also available on the Department of Commerce’s website: mn.gov/commerce/energyfacilities.



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Huntley-Wilmarth Transmission Line Project Background

Xcel Energy and ITC Midwest LLC are proposing to build the Huntley-Wilmarth project, an approximately 50-mile, 345 kilovolt (kV) transmission line in southern Minnesota. The transmission line would connect Xcel Energy’s Wilmarth Substation, north of Mankato, and ITC’s Huntley Substation, south of Winnebago. The Huntley-Wilmarth project will reduce congestion on the transmission grid in southern Minnesota and northern Iowa and deliver low-cost electricity from generation facilities, including wind farms in the area, to consumers. View a map of proposed routes inside, and updated information on the project above.

Project Benefits

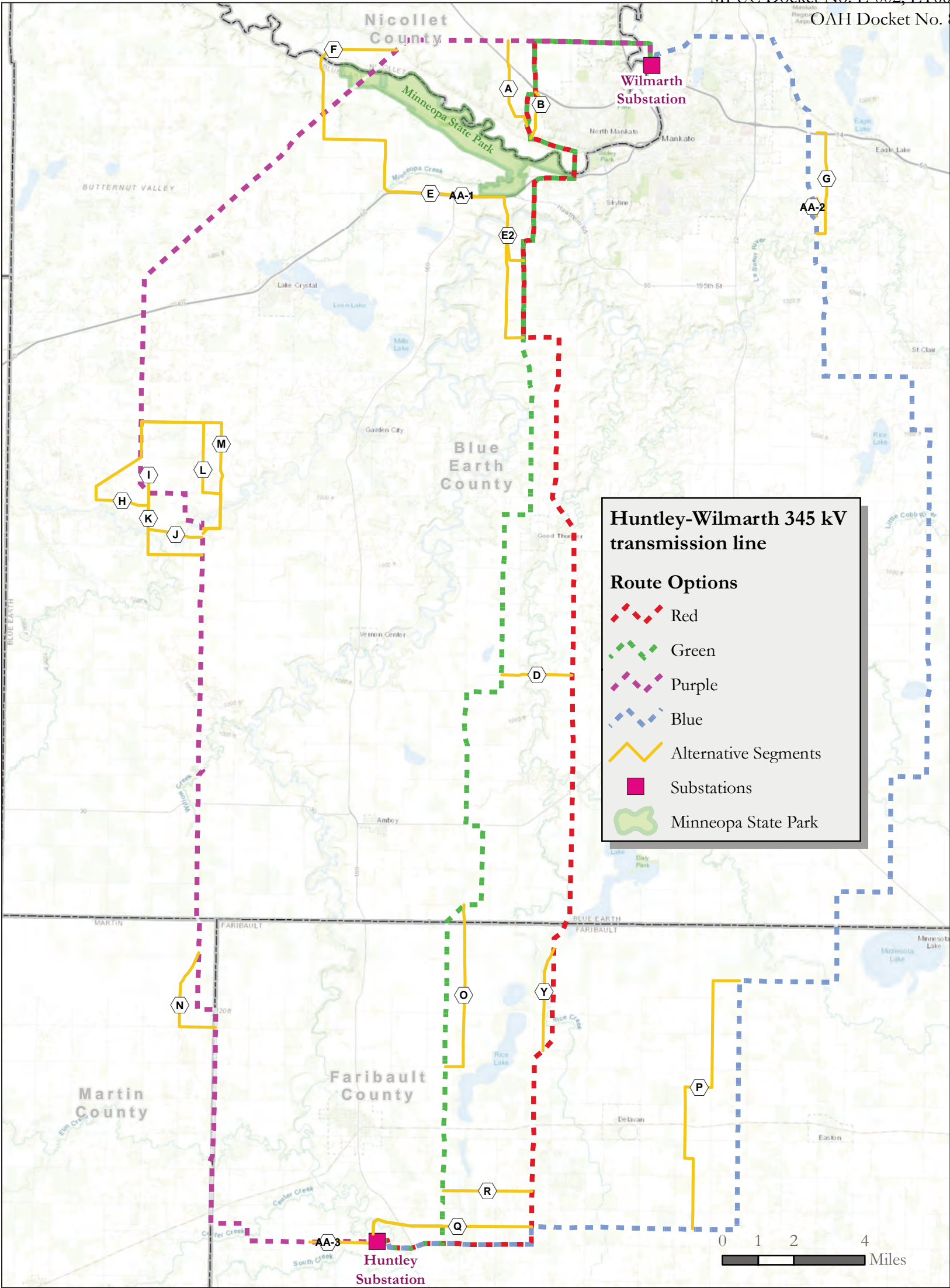
The Huntley-Wilmarth project will provide several local and regional benefits including:

- Relieving congestion on the transmission grid
- Increasing transmission capacity to deliver low-cost energy to customers
- Supporting new generation development, including renewable energy
- Increasing property tax revenues for local governments



Huntley-Wilmarth 345 kV transmission line proposed routes

Exhibit____(TGH-1) Schedule 5
MPUC Docket No. E-002, ET6675/CN-17-184
MPUC Docket No. E-002, ET6675/TL-17-185
OAH Docket No. 82-2500-35157
Page 4 of 4



Comments and Questions

If you have questions or comments about the project please contact:

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651-539-1841

Charley Bruce
Minnesota Public Utilities Commission
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You can also view detailed project maps at huntleywilmarth.com. You can reach Xcel Energy and ITC project representatives by calling our toll-free number 1.855.839.8865 or by sending an email to huntleywilmarth@xcelenergy.com.

Permitting Schedule (subject to change)

Certificate of need and route permit applications filed with Commission	January 2018
Informational and scoping meetings (public meetings and comment period)	Spring 2018
Draft environmental impact statement issued	December 2018
Public meetings on draft environmental impact statement (public meetings and comment period)	January 2019
Public hearings (public hearings and comment period)	January/February 2019
Anticipated Commission decisions	Summer 2019