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January 28, 2019

Valerie T. Herring
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VIA ELECTRONIC FILING AND U.S. MAIL

The Honorable Barbara Case
Administrative Law Judge
State of Minnesota Office of Administrative Hearings
600 North Robert Street
PO Box 64620
St. Paul, MN 55164-0620

**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 Judge Case:

Enclosed, please find the Surrebuttal Testimony and Schedule of Thomas Hillstrom, filed on behalf of Northern States Power Company, doing business as Xcel Energy, and ITC Midwest LLC (collectively, Applicants).

Please feel free to contact me with any questions regarding this filing.

Sincerely,

/s/ Valerie T. Herring

Valerie T. Herring

Enclosure

cc: Official Service List

Surrebuttal Testimony and Schedule
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/TL-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

SURREBUTTAL TESTIMONY OF

THOMAS G. HILLSTROM

On Behalf of

**NORTHERN STATES POWER COMPANY,
A MINNESOTA CORPORATION**

and

ITC MIDWEST LLC

January 28, 2019

Exhibit ____ (TGH-3)

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Schedule

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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. HAVE YOU PREVIOUSLY PROVIDED TESTIMONY IN THIS PROCEEDING?

A. Yes. I filed Direct Testimony and Rebuttal Testimony on behalf of Xcel Energy (Xcel Energy) and ITC Midwest LLC (ITC Midwest) (collectively, Applicants) for a Certificate of Need and Route Permit for the Huntley – Wilmarth Project (Project).

Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY?

A. Consistent with commitments made in my Rebuttal Testimony, the purpose of my Surrebuttal Testimony is to provide Applicants' comments on the Draft Environmental Impact Statement (DEIS) that was issued by the Department of Commerce – Energy and Environmental Review and Analysis on December 7, 2018.

Q. ARE THERE ANY SCHEDULES ATTACHED TO YOUR SURREBUTTAL TESTIMONY?

A. Yes. The following schedule is attached to my Surrebuttal Testimony:

Schedule 1: Applicants' January 25, 2019, DEIS Comments

1 **II. DRAFT ENVIRONMENTAL IMPACT STATEMENT COMMENTS**

2
3 Q. WHAT DID YOU STATE IN YOUR REBUTTAL TESTIMONY WITH RESPECT TO
4 THE DEIS THAT WAS ISSUED FOR THE HUNTLEY-WILMARTH PROJECT ON
5 DECEMBER 7, 2018?

6 A. In my Rebuttal Testimony, I explained that Applicants were in the process
7 of reviewing the DEIS and would file Applicants' comments on the DEIS in
8 January 2019 in both the Certificate of Need docket (Docket No.
9 E002/ET6675/CN-17-184) and the Route Permit docket (Docket No.
10 E002/ET-6675/TL-17-185). I also stated that I would attach a copy of
11 these comments to my January 28, 2019, Surrebuttal Testimony.

12
13 Q. HAVE APPLICANTS FILED THEIR DEIS COMMENTS?

14 A. Yes. On January 25, 2019, Applicants filed their DEIS comments.
15

16 Q. ARE APPLICANTS' DEIS COMMENTS ATTACHED TO THIS SURREBUTTAL
17 TESTIMONY?

18 A. Yes. Consistent with the commitment made in my Rebuttal Testimony,
19 Schedule 1 to this Surrebuttal Testimony is a copy of Applicants' DEIS
20 comments.
21

22 **III. CONCLUSION**

23
24 Q. DOES THIS CONCLUDE YOUR PRE-FILED SURREBUTTAL TESTIMONY?

25 A. Yes.



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100 East Grand Avenue, Suite 230, Des Moines, IA 50309
515.282.5300, itc-holdings.com

January 25, 2019

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
**COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT
STATEMENT**

Dear Mr. Kirsch:

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

Applicants appreciate the work of the Department of Commerce, Energy Environmental Review and Analysis (EERA) in preparing the DEIS. The document provides a comprehensive review of the Project and routes under consideration for its construction, allowing for a thorough analysis of the potential impacts of the Project. Applicants provide EERA with limited comments to clarify certain items in the DEIS and to provide additional information.

Applicants have provided a table with this letter summarizing the changes we believe should be made to the Final Environmental Impact Statement (FEIS) to correct

errors in the DEIS. Most of these changes are minor word changes, deletions, or clarifications. There are two areas of the DEIS, that Applicants believe are aided by additional context, and these are discussed below.

Classification of the Project as a Market Efficiency Project (MEP)

At pages S-5 and 4-10, the DEIS states the following regarding the classification of the Project by the Midcontinent Independent System Operator, Inc. (MISO) as an MEP:

Per MISO, to qualify as an MEP, the benefit-to-cost ratio for the project must meet or exceed 1.25. That is, there must be an economic benefit in reduced energy costs that clearly exceeds the cost of building the project. If the benefit-to-cost ratio is greater than 1.25 and the project qualifies as an MEP, costs for the project are spread throughout the states and provinces in the MISO footprint. However, if the ratio is less than 1.25 and the project does not qualify as an MEP, costs for the project would be borne solely by Minnesota ratepayers.

The text seems to imply that MISO only approves two types of projects: MEPs and non-MEPs. Instead, there are six different project classifications in the MISO Tariff with different cost allocation methodologies.

While the text is correct that the costs for MEPs are shared, the allocation methodology is more complex than the text suggests. For MEPs, the MISO Tariff provides that 20 percent of the Project's costs are allocated to each pricing zone in the MISO Classic area based on load share ratio. The remaining 80 percent of the costs of an MEP are allocated to pricing zones based on the distribution of positive Adjusted Production Cost savings to the Local Resource Zones. The discussion in the DEIS should be revised to reflect these nuances in the FEIS.

In addition, the text suggests that the MEP designation can be revoked if a benefit-to-cost ratio drops below 1.25. Rather, once a project is approved by MISO as an MEP, a project maintains that designation. Applicants, therefore, recommend deleting the sentence that begins: "However, if the ratio is less than 1.25 . . . ," to avoid including an incorrect statement in the FEIS.

Non-Residential Buildings Along Routes

At page 5-11, the DEIS discusses potential displacement by the Project. Specifically, the DEIS states that a seasonal residence and non-residential buildings "could be displaced by the [P]roject." Applicants have previously reviewed all the buildings referred to in this statement. Applicants, first, note that the "seasonal residence" is a

hunting trailer located approximately 500 feet west of the Huntley Substation. This trailer is used sporadically during the year, is not currently connected to a well or septic system, and is in close proximity (approximately 30 feet) to an existing 345 kV/161 kV transmission line right-of-way. During one of the public meetings on the DEIS, the owners of this land stated that they plan to build a permanent home on this parcel and that there is not enough buildable land to accommodate an additional transmission line easement and a new home.

Applicants believe that both the original Purple Route alignment and both alignment Alternatives AA-3 remain feasible options. If the Purple Route is approved, Applicants would work with the property owner to determine whether landowner concerns could be addressed by reducing the need for additional right-of-way through the use of alternative structure designs, moving the trailer slightly, or other options for this short segment of the Purple Route. If Applicants cannot find a solution that is acceptable to the landowner, Applicants would either pursue a design that is contained in the existing ITC Midwest right-of-way or will utilize the south side of 160th Street along Alternative Alignment AA-3. Each of these alignment options are within the Applicants' proposed route width at this location.

As to the other non-residential buildings referred to in this statement, Applicants can avoid any structure being located within the transmission line right-of-way by pole placement within the designated route width, use of specialty structures, or modifying the right-of-way width. Applicants are committed to working with landowners to implement additional design or mitigation measures as necessary to ensure adequate clearances and to address landowner concerns in these instances. Applicants respectfully request that these additional details be included in the FEIS.

Finally, as it relates to non-residential buildings discussed in the DEIS, there appears to be a discrepancy between page 5-11 ("18 non-residential buildings") and page 6-7 ("13 non-residential structures"). These two pages should be reviewed to ensure consistency in the number and terminology before issuance of the FEIS.

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

Attachment

cc: Service Lists
Judge Barbara Case
Tricia DeBleeckere

Page Number	DEIS Text or Map	Applicants' Proposed Revisions and Discussion
S-1 and 1.1	"The Perceived Problem: Congestion on the Electric Transmission Grid"	Applicants recommend deleting the term "perceived" as this term implies that the congestion problem is not a proven fact. The problem is real and well documented. MISO has identified and documented congestion along the Minnesota and Iowa border since 2009. As noted on page 69 of the Certificate of Need Application, MISO studies first publicly reported congestion as a problem in the border area of Minnesota/Iowa in 2009 in the MTEP08 Regional Generation Outlet Study (RGOS).
S-5 and 4.1.4	"The Huntley to Wilmarth project has been proposed by MISO as a market efficiency project (MEP)."	The word "proposed" should be changed to "approved." MISO approved the Project as an MEP in MTEP16.
S-11	"Land-use impacts can be minimized by use of the purple and purple-E-red routes. The red and green routes significantly impact North Mankato's land-use and development plans."	The word "significantly" should be stricken from this sentence given the speculative nature of the development plans in this area and that most of this area has not yet been annexed by the City of North Mankato for development purposes.
S-11	"Impacts to public services can be minimized by selecting a route other than the blue route. The blue route has the potential to impact the Eastwood solar farm and possible future expansions of the Mankato Regional Airport."	A sentence should be added to the end of this paragraph as follows, consistent with the descriptions in Chapter 6 (pages 6-12 to 6-13): <u>"Any impacts to these two features are anticipated to be minimal and can be further minimized through the design process with the use of specialty structures or pole placement and, in the case of the airport, compliance with FAA, MnDOT, and airport guidelines."</u>

Page Number	DEIS Text or Map	Applicants' Proposed Revisions and Discussion
2-9	“The Commission’s route permit supersedes local planning and zoning regulations and ordinances. However, permittees must obtain local approvals necessary for proper local government functioning—e.g., the safe use of local roads.”	The second sentence of this section does not accurately reflect the preemptive effect of a route permit. Local governments retain authority to require certain approvals for use of their right-of-way based on their land rights. Therefore, Applicants suggest that the second sentence be deleted and replaced as follows: “However, permittees must obtain local approvals necessary for proper local government functioning—e.g., the safe use of local roads. Local <u>units of government retain the authority to regulate the use of their public right-of-ways and the Applicants will obtain necessary permits for road use and occupation, as identified in Table 2-1 for construction and operation of the Project.”</u>
3-9	Map 3-6 of Route Segments E and E-2	Map 3-6 shows an incorrect alignment for Segment E in the one half mile section where Segment E turns south from the Highway 169 right-of-way. The proposed alignment for this section of Segment E should go around the pond rather than over it.
3-28	“. . . ; thus, this statute would likely apply to properties crossed by the proposed Huntley to Wilmarth 345 kV transmission line.”	Applicants suggest the following clarifying language be added to ensure that readers understand that the application of the statute is not, necessarily, to all properties crossed by the proposed transmission line. “. . . ; thus, this statute would likely apply to <u>many of the</u> properties crossed by the proposed Huntley to Wilmarth 345 kV transmission line.”
4-1	“Electrical transmission congestion occurs when energy that needs to flow across a transmission line to meet electrical demand cannot be transmitted.”	The term “congestion” more accurately refers to the situation where a generation resource is not able to export its entire generation output into the transmission grid due to the amount of electricity flowing on the transmission line relative to the transmission line’s capacity, thereby necessitating a generation resource to turn down, or “curtail” its output.

Page Number	DEIS Text or Map	Applicants' Proposed Revisions and Discussion
4-6	<p>“During periods of severe grid congestion, wind generators are curtailed (turned off), meaning low-cost energy never makes it onto the transmission system at all.”</p>	<p>The term “curtailed” can also mean that a generators’ production is ramped down and as a result is not the same as “turned off.”</p> <p>This paragraph should be replaced with the following: <u>“During periods of severe congestion, low-cost wind energy cannot flow freely along the transmission system. As a result, more expensive generators are ordered to operate or increase output (dispatched) to replace the low-cost wind energy that could not be delivered to the end user. Predictably, this re-dispatch due to transmission congestion increases the price of electricity for both wholesale and retail customers.”</u></p>

Page Number	DEIS Text or Map	Applicants' Proposed Revisions and Discussion
4-12	<p>“There are 161 kV lines in the project area. These lines are electrically similar to 230 kV and 138 kV lines and would not require substation upgrades. That is, substations in the project area are already configured to commute, switch, and transform electricity at 161 kV.”</p>	<p>This sentence is not accurate as substation upgrades would be required to accommodate a new 161 kV line. While it is correct that there are 161 kV lines in the vicinity of the project area, the Wilmarth Substation does not currently have any 161 kV line terminations or 161 kV equipment. Adding a new 161 kV line to the Wilmarth Substation would require physical expansion of the substation and rearrangement of its current configuration to accommodate this new voltage. The Huntley Substation would require, at minimum, a new line terminal to accommodate the new 161 kV line.</p> <p>Applicants recommend that following edits: “<u>There are 161 kV lines in the project area. These lines are electrically similar to 230 kV and 138 kV lines and would not but would require substation upgrades. That is, substations in the project area are already configured to commute, switch, and transform electricity at 161 kV. Adding a new 161 kV line to the Wilmarth Substation would require physical expansion of the substation and rearrangement of its current configuration to accommodate this new voltage. The Huntley Substation would require, at minimum, a new line terminal to accommodate the new 161 kV line.</u>”</p>
4-17	Map 4-4	<p>The typo in the map title should be corrected to “Studied.”</p>

Page Number	DEIS Text or Map	Applicants' Proposed Revisions and Discussion
4-27 and 4-28	Table 4-7 includes green circles in the “relieves congestion and improves access to low-cost electrical generation” in the rows for “Transmission Line Voltages = 345 with Different Endpoints” and “Upgrading Existing Facilities.”	<p>These green circles indicate that these alternatives are “consistent” with the statement that the alternative “relieves congestion and improves access to low-cost electrical generation.” Based on Applicants’ analysis, these circles should be yellow.</p> <p>For “Transmission Line Voltages with Different Endpoints,” as stated on page 113 of the Certificate of Need Application “in the case of the Huntley-Wilmarth Project, the outage element as well as the congested transmission path are electrically very similar. Due to this unique combination, and as it has been shown throughout the development of this Project, an alternative transmission line with end points other than that of the constraint and outage element would be unlikely to provide the same level of congestion relief as a transmission line directly connecting those end points.” As such, this alternative should be marked with a yellow circle indicating that is “somewhat consistent or consistent in part.”</p> <p>For “Upgrading Existing Facilities” as stated on page 114 of the Certificate of Need Application, “MISO analyzed reconductoring the existing 161 kV transmission line connecting Huntley (Winnebago) to Blue Earth, and from Blue Earth to South Bend and then adding a new 161 kV circuit between South Bend to Wilmarth as project I-15 in MTEP16. MISO’s analysis determined that this solution provides some market benefits, but the benefit-to-cost ratio is lower than the proposed 345 kV Project and the 161 kV alternative would not fully address the identified congestion along the Minnesota/Iowa border.” As such, this alternative should be marked with a yellow circle indicating that is “somewhat consistent or consistent in part.”</p>

Page Number	DEIS Text or Map	Applicants' Proposed Revisions and Discussion
5-11	"There is one seasonal residence and 18 non-residential buildings (e.g., agricultural outbuildings or animal production structures) within the rights-of-way of routing alternatives for the project. These buildings could be displaced by the project."	There is a discrepancy in the DEIS as page 5-11 refers to 18 buildings but page 6-7 refers to 13 structures. The number should be reviewed and either "buildings" or "structures" should be consistently used.
5-15	"Impacts could also be mitigated by using the protections of Minnesota Statute 216E.12, subdivision 4 (commonly known as the "Buy the Farm" statute), where available, to move residents away from potential property value impacts."	"Impacts could also be mitigated by using <u>Owners of many of the properties could potentially use</u> the protections of Minnesota Statute 216E.12, subdivision 4 (commonly known as the "Buy the Farm" statute), where available, to move residents away from potential property value impacts."
5-28	"Severe weather, including high winds, ice, and snow storms and tornadoes, could possibly create safety hazards on any roadways located within the designed fall distance of an overhead transmission line. Snow and ice accumulation and high winds could increase a structure's weight, making it more susceptible to failure or collapse."	This paragraph should be supplemented with the following addition at the end: <u>Applicants' design standards exceed the National Electric Safety Code requirements for safe design and operation of transmission lines. These standards include designing transmission lines to withstand severe winds from summer storms and withstand the combination of ice and strong winds from winter weather. This ensures that impacts are minimized in the remote event that a transmission structure fails or collapses.</u>
5-34	"(Appendix G)"	This should be revised to "(Appendix F)", the appendix titled "Electric and Magnetic Fields Supplement."

Page Number	DEIS Text or Map	Applicants' Proposed Revisions and Discussion
5-34	<p>“In general, these studies concur that: . . .</p> <ul style="list-style-type: none"> ○ A need for a prudent avoidance approach in the design and use of all electrical devices, including transmission lines.” 	<p>The “prudent avoidance” principle sets forth that reasonable efforts to minimize potential risks should be taken when the actual magnitude of the risks is unknown. As stated in Appendix F to the DEIS, in 2007, the World Health Organization, which completed an in-depth analysis of the body of scientific research on exposure to magnetic fields and provided recommendations regarding such exposure concluded that a “precautionary approach” was warranted. Therefore, Applicants suggest the following revision:</p> <p>“In general, these studies concur that: . . .</p> <ul style="list-style-type: none"> ○ A need for a prudent avoidance <u>precautionary</u> approach in the design and use of all electrical devices, including transmission lines.”
6-9	Map 6-1	<p>While this map includes the development plans provided by the City of North Mankato and clarifies that the areas of the Red and Green Routes are “conceptual” developments, the map does not show that the area of the Red and Green Routes is also not within the current municipal boundaries of the City of North Mankato.</p>
6-7	<p>“However, there is one seasonal residence and 13 non-residential structures (e.g., agricultural outbuildings or animal production structures) within the rights-of-way of route alternatives (Table 6-1 and Table 6-3).”</p>	<p>There is a discrepancy in the DEIS as page 5-11 refers to 18 buildings but page 6-7 refers to 13 structures. The number should be reviewed and either “buildings” or “structures” should be consistently used.</p>

Page Number	DEIS Text or Map	Applicants' Proposed Revisions and Discussion
6-8	<p>“Impacts to North Mankato’s planned future development due to the red and green routes are anticipated to be significant. This is particularly true for residential development. The transmission line would have a significant impact on past, current, and future investments and on future tax revenues. It would adversely influence residential growth in this area of the city.”</p>	<p>The word “significant” should be stricken from these sentences given the speculative and “conceptual” nature of the development plans in this area. Further, this area has not yet been annexed by the City of North Mankato for development purposes.</p>
6-31 and 6-32	Table 6-9	Table is referenced, but appears to be missing.
7-55 and Table 7-13	<p>“However, because route segment Y is double-circuited with an existing 161 kV line for its entire length, it places fewer monopole structures (-9 structures) in agricultural land than the red route (12 structures) (Table 7-13). Route segment Y actually reduces the total number of structures in agricultural land, as H-frame structures will be removed as part of the double-circuiting, and the new monopole structures will have relatively longer spans. Thus, route segment Y best minimizes agricultural impacts in this area of the project.”</p>	<p>The Red Route is also double-circuited in this location. The comparison between the agricultural impacts of Segment Y and the Red Route are: Segment Y places 0 additional monopole structures in agricultural land and the comparable segment of the Red Route places 1 additional structure in agricultural land.</p>

Page Number	DEIS Text or Map	Applicants' Proposed Revisions and Discussion
7-56	<p>“Route segment Y, at a cost of \$9.31 million, is more expensive than the red route (\$8.87 million) (Table 7-13). This is primarily because route segment Y is double-circuited for its entire length and the red route is a single-circuit.”</p>	<p>The Red Route is also double-circuited in this location. The text should be revised as follows: Route segment Y, at a cost of \$9.31 million, is more expensive than the red route (\$8.87 million) (Table 7-13). This is primarily because <u>the north end of route segment Y has more angle structures and would also require foundations in or near a wetland.</u> <u>Both route segment Y and the comparable Red Route segment would be constructed as 345 kV/161 kV is-double-circuited for its entire length and the red route is a single circuit.</u></p>

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

Jill N. Yeaman certifies that on the 28th day of January 2019, she filed a true and correct copy of **Surrebuttal Testimony and Schedule of Thomas G. Hillstrom**, 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/ Jill N. Yeaman

Jill N. Yeaman

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