

Dear Sir,

20 November 2007

In regards to the Great River Energy 345 kV transmission line from Brookings SD to Hampton MN public meetings to gather input from the public concerning the potential human and environmental impacts, I will be unable to attend. Here are my comments. We are in the proposed project corridor for the transmission line. I am writing to be certain that you are aware of the planned park in our area and the Native American burial mounds on our property. I attended the capx 2020 open House in New Prague on September 25th.

My name is Lynn Albrecht. John Hutchinson and I own 250 acres on the Minnesota River in Blakeley Township, Scott County in the area the Met Council and Scott County are planning for the future Blakeley Bluffs Regional Park Reserve. There are 30+ Native American burial mounds on our property, surveyed and mapped in 1889 by Lewis. Patrick McLoughlin, Cultural Resource Specialist with the USDA - NRCS recommended our property be considered for the National Register of Historic Places. He said the mounds are more than likely associated with a habitation component or village. The land is bluffs, ravines, river frontage and heavily wooded. We also have approximately 12 acres of native prairie grass. Our bluffs and ravines host concentrations of maple, basswood and oak forests of the Big Woods region, plant communities that have nearly disappeared. We also have a large community of birds, reptiles, amphibians and mammals, some of which are rare and may be endangered species. We are in the DNR metro conservation corridor, a regionally significant ecological area and an MCBS site of biodiversity significance.

As longtime friends of the environment, we strongly oppose the idea of a transmission line on our property. We have worked hard to maintain and preserve this natural area. This is the wrong place for a transmission line.

The Great River Energy proposed transmission line corridor is a large corridor, is there anything we can do to be sure that the transmission line will choose a route other than across a future regional park and land with historical and environmental significance? Hopefully the transmission lines can be placed in areas that are already developed with industry and not destroy what is left of our natural resources. Or better yet, why don't you focus on conservation. Teach people how to conserve energy and require tough energy star standards on all electric appliances.

the Scott County Parks Department contact person is Patricia Freeman - phone: 952-496-8496
Met Council Parks contact person is Arne Stefferud - phone: 651-602-1360
Office of the State Archaeologist has maps of Burial Mounds - phone: 612-725-2411
Patrick McLoughlin, Cultural Resource Specialist with the USDA - NRCS phone: 651-602-7907

sincerely

Lynn Albrecht & John Hutchinson
24785 Chatfield Drive
Belle Plaine MN 56011
sections 18 & 13 Blakeley Township, Scott County

Lynn Albrecht
John Hutchinson



David Birkholz

From: marilyn ampe [mari.ampe@gmail.com]
Sent: Monday, January 14, 2008 10:39 AM
To: David.Birkholz@state.mn.us
Subject: PUC docket no. CN-06-1115, CapX 2020 Certificate of Need

January 14, 2007
Via email:
david.birkholz@State.mn.us.

David Birkholz
Minnesota Department of Commerce
85 7th Place East Suite 500
St. Paul, MN 55101

Dear Sir,

In reference to the Certificate of Need permit application and Environmental Report for the CapX 2020 project (PUC docket no. CN-06-1115), we submit the following for full evaluation and consideration in determining Minnesota's future need for electrical energy.

Excessive, poorly designed, non zoned lighting wastes electricity, imperils human health and safety, disrupts natural habitats and endangers animals.

-Billions of dollars worth of energy are wasted annually by bad or unnecessary lighting such as landscape lighting, unshielded security lighting such as full illuminated car dealership lots and unused nighttime parking facilities.

-Studies have suggested that the lack of darkness can contribute to illness such as breast cancer, due to the circadian disruption of hormones, as well as common sleep disorders, decreased work performance and accident potential.

-Unshielded, poorly designed safety lighting is not as effective in protecting property or creating personal security as shielded lighting. Unshielded lighting also causes "light trespass" unintentionally adversely affecting others.

-Excessive light effects migratory birds and other animals such as sea turtles that use night light as guidance. It diminishes insect populations by drawing them out of their habitat and makes species vulnerable to accident or predators.

The projected electrical needs of the CapX 2020 project can be saved through rezoning, new lighting standards and increased public awareness of energy conservation, such as simply turning the light switch down or off. Conservation also does not contribute to global warming or ocean acidification.

It is worth noting, as a by-product of this savings, Minnesota's citizens would benefit by not creating pass-through energy corridors - corridors structured to supply electricity to the Eastern United States. Minnesota citizens would also not be subjected to the abuses and illegal tactics practiced in the recent MinnCan project.

Sincerely,

Robert J. Schestak
Mari lyn C. Ampe

Members, UCAN
United Citizens Action Network

241 Cleveland Av. S.
St. Paul, MN 55105

David Birkholz

From: marilyn ampe [mari.ampe@gmail.com]
Sent: Monday, January 14, 2008 10:39 AM
To: David.Birkholz@state.mn.us
Subject: PUC docket no. CN-06-1115, CapX 2020 Certificate of Need

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Via email:
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David Birkholz
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85 7th Place East Suite 500
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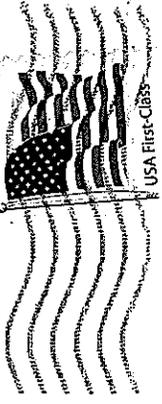
Sincerely,

Robert J. Schestak
Mari lyn C. Ampe

Members, UCAN
United Citizens Action Network

241 Cleveland Av. S.
St. Paul, MN 55105

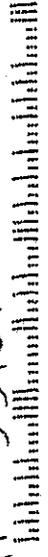
Albrecht & Hutchinson
24785 Chutfield Drive
Belle Plaine MN 56011



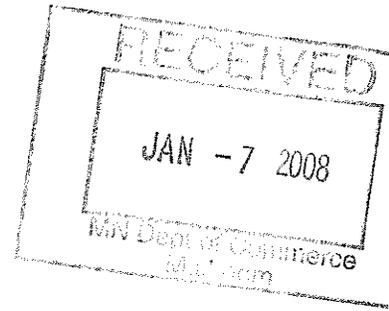
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David Birkholz
Energy Facility Permitting
Minnesota Dept. of Commerce
85 7th Place East Suite 500

St Paul MN 55101



43965 450th Street
Sauk Centre, Minn. 56378
Jan. 5, 2008



David Birkholz
Minn. Dept. of Commerce
Energy Facility Permitting
85 7th Place East, Suite 500
St. Paul, Minn. 55101-2198

RE: Cap X 2020

Dear Mr. Birkholz:

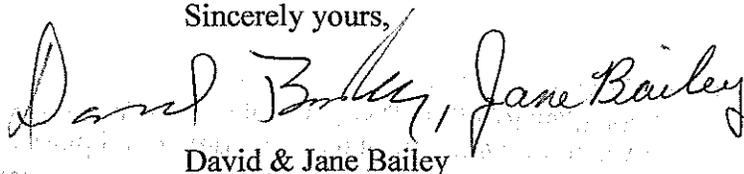
We have a few comments to make regarding the siting of the proposed Cap X 2020 powerline.

Comments were made at the Alexandria meeting to the effect that the line should be sited so as to give the greatest benefit to as many people as possible while affecting as few as possible. This simply means to put it across prime farmland. This is wrong because of the inconvenience it would put on farmers such as farming around towers and being in the way of irrigation systems. Also with less and less farmland available for crops, I think that powerlines, pipelines and other planners should realize that farmland is not a renewable resource.

The D.C. powerline went around most of the wetland area. This was wrong then and should not be considered as a factor in siting this powerline.

An ideal place for the powerline is on the old Great Northern Railroad right of way. There is plenty of room on either side of the railroad bed and it also has easy access with no wetlands to go around. The state has control of this land so this would eliminate the need for most of the easements otherwise needed. The need for eminent domain should be eliminated and the cost should be considerably less.

Sincerely yours,

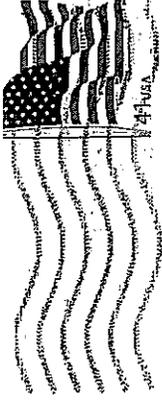

David & Jane Bailey

DB:jb

David Bailey
43965 450th St.
Sauk Centre, MN 56378

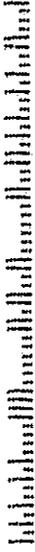
MINNEAPOLIS MN 554

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David Birkholz
Minn. Dept. of Commerce
Energy Facility Permitting
85 7th Place East, Suite 500
St. Paul, Minn. 55101-2198

55101+6013



David Birkholz

From: Annette Bair [phydev@swrdc.org]
Sent: Monday, January 14, 2008 10:07 AM
To: David.Birkholz@state.mn.us
Subject: FW: comment on Docket Number ET-2, E-002/CN-06-1115

*Annette Bair
SRDC Physical Development Director
SW CERT Coordinator
2401 Broadway Ave
Slayton, MN 56172
507.836.8547 ext 101
FAX 507.836.8866*

From: Annette Bair
Sent: Monday, January 14, 2008 10:04 AM
To: 'David.birkolz@state.mn.us'
Cc: 'Adam Sokolski'; John Shepard (jshepard@swrdc.org)
Subject: comment on Docket Number ET-2, E-002/CN-06-1115

David,

The SRDC has been assisting the Counties in SW MN in the development of their Hazard Mitigation Plans. How will potential problems (downed power lines, power outages, etc) with the 345kV lines interface with the County Hazard Mitigation Plans / Emergency response, etc?

Thank you
Sincerely
Annette Bair

*Annette Bair
SRDC Physical Development Director
SW CERT Coordinator
2401 Broadway Ave
Slayton, MN 56172
507.836.8547 ext 101
FAX 507.836 8866
phydev@swrdc.org*

David Birkholz

From: Doug Bock [webmaster@wmgallery.com]
Sent: Thursday, January 10, 2008 1:38 PM
To: David Birkholz
Subject: Re: CapX2020 comments

To: Mr. David Birkholz
 Minnesota Department of Commerce

From:
 Doug Bock
 4870 Elmore Ave
 Webster MN. 55088
webmaster@wmgallery.com

Following are my comments and concerns for the Environmental Report and Certificate of Need for the Capx 2020 345kv transmission lines.

1) The need for new transmission lines can be reduced and the money better spent by:

- Enabling residential and commercial users to do their own power generation including solar and wind.
- Maximize the use of existing corridors by increasing capacity
- Support off-peak energy programs and use of compact fluorescent bulbs

2) New power lines should be routed next to existing power lines or along major corridors like interstate highways. Routing through rural areas may reduce resistance due to lower population but the lines have a much greater impact on open spaces and break up the remaining un-crowded area that are left. The latest Scott and Rice county comprehensive plans support the protection of open spaces and should be respected.

3) Webster Township sections 5,6,7,8,17 and 18 are sensitive areas for biological reasons. This area contains many lakes, marshes, connected creeks and connected woodlands. This is also part of the U.S. Fish and Wildlife Service Big Woods Focus Area as well as the Porter Creek watershed. Many landowners are using CRP, RIM and wetland restoration to maintain the habitat and water resources. This is an investment in the future and a powerline cutting through would not be welcome or appropriate. This area is also designated as a future conservation corridor in the Scott county comprehensive plan.

4) Section 8 of Webster Township is a unique area of diverse natural resources and wildlife habitat. It is also under great pressure for future development which has pushed land values up way beyond the value for similar Ag land in other areas. Any large powerline in this area would be devastating to the property values due to its probable future use as open space design development and conservation corridors. "Normal" easement payments could never make up for the lost financial and personal value to the landowners.

5) If powerline easements are created in an area like that described above a more fair method of compensation must be found. The value of the entire property and adjoining properties is effected and should be compensated for.

----- Original Message -----

From: [David Birkholz](#)
To: [Doug Bock](#)
Sent: Thursday, January 10, 2008 11:08 AM
Subject: RE: CapX2020 comments

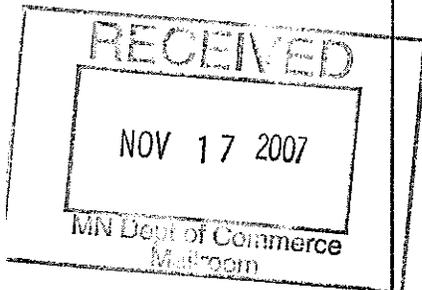
Email is perfectly acceptable. -db-

From: Doug Bock [mailto:webmaster@wmgallery.com]
Sent: Thursday, January 10, 2008 10:26 AM
To: David.Birkholz@state.mn.us
Subject: CapX2020 comments

Mr. David Birkholz,

I am a landowner in Rice county and have comments on the 345kv line Certificate of need. Is it acceptable to send comments to you by e-mail or must they be mailed in as hard copy comments? Please let me know today if possible.

Thanks and Regards,
Doug Bock



Scoping the ER Content

- Human and environmental impacts of the project due to size, type, and timing of the project, system configurations, and voltage
 - Information on alternatives to the project
 - Mitigating measures for possible adverse impacts
- (See Minnesota Rule 7849.7030)



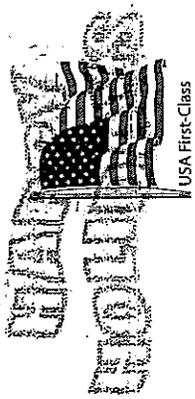
Using the above slide as a guideline, please share your ideas on issues for the Environmental Report. The report will be a part of the PUC Hearing on the CapX 2020 Project's Certificate of Need application.

(Use back of page for additional comments.)

If the need is there? I think CapX 2020 should use the same right of way whenever possible that other lines or pipelines are using. If ~~not~~ using existing right of ways CapX 2020 should pay additional money to the people giving the easements. The reliability of transmission lines seems to be so good that spacing seems insignificant in a weather event. Bob Broich 612-816-4215

Birch
9105 Mitchell Rd.
E. P. Mn. 55347

MINNEAPOLIS MN 554
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David Birkholz
Mn. Dept of Commerce
87 7th Place East Suite 500
St. Paul. Mn. 55101-2198

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Scoping the ER Content

Human and environmental impacts of the project due to size, type, and timing of the project, system configurations, and voltage

Information on alternatives to the project

Mitigating measures for possible adverse impacts

(See Minnesota Rule 7849.7030)



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MN Dept. of Commerce

Using the above slide as a guideline, please share your ideas on issues for the Environmental Report. The report will be a part of the PUC Hearing on the CapX 2020 Project's Certificate of Need application.

(Use back of page for additional comments.)

Jean Buske
6918-25 Ave SE
Rochester, MN 55904

Property at: 4131 Cty Rd 21 NE
Farmington Township

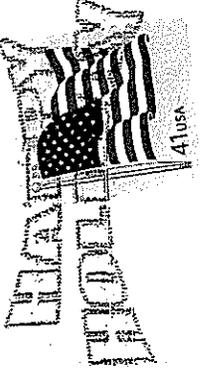
Concerns:
I have the Williams Pipeline across my property, which they do low fly across.
2nd. the well on the farm site is close to the road.
Don't believe it is within

Joan Buske
2718 25th Ave. SE
Rochester, MN 55904



PHOENIX AZ 850

07 JAN 2008 PM 1 L



Muriel Burkhalz
Mines Department of Commerce
Energy Facility Permitting
85 17th Place East, Suite 500
St Paul, MN 55101-2198

5510142198 0016





DUININCK BROS. INC.

CONSTRUCTION EXCELLENCE

PO Box 208
Prinsburg, MN 56281
Call: (320) 978-6011
Fax: (320) 978-4978

Duininck Bros. Inc.

Fax

Dept of Commerce

To: <u>David Birkholz</u>	From: <u>Vern E. Carlson, PE</u>
Fax: <u>651-297-1959</u>	Pages: <u>1</u>
Phone: <u>296-2878</u>	Date: <u>12-21-07</u>
Re: <u>Group 1 Power Lines</u>	CC:
<u>CAP-X</u>	

• Comments: David - In reply to a request for public comment on the proposed Group 1 power lines for CAP-X 2020, I would like to add my approval to the proposal; it is needed, and the sooner the better. Environmentalists & anti-everything groups will find a hundred reasons to object (none with any validity) but hopefully, common sense will prevail. Thanks for the opportunity to comment. Good Luck (we need more US oil & nuclear power).

Vern Carlson



January 14, 2008

Mr. David Birkholz
Energy Facility Permitting
Minnesota Department of Commerce
85 7th Place East, Suite 500
St. Paul, MN 55101

Subject: Sierra Club scoping comments on CAP X 2020 Project Certificate of Need (CN-06-1115)

Dear Mr. Birkholz:

Thank you for the opportunity to participate in scoping for the CAP X 2020 Project's Certificate of Need Application (Project). These comments are provided on behalf of the 25,000 members of the North Star Chapter of the Sierra Club. A central component of the Sierra Club's mission is to practice and promote the responsible use of the earth's ecosystems and resources; we also strive to educate and enlist humanity to protect and restore the quality of the natural and human environment. We offer these comments in that spirit.

The purpose of our comments is to identify potential alternatives to and impacts of the proposed Project that should be fully addressed in the Environmental Report being prepared by the Department of Commerce.

As an initial observation, the Sierra Club understands that because the Applicants intend to develop the Cap X 2020 projects with benefits provided by the US Department of Agriculture Rural Utility Service (RUS) programs, the Department of Commerce is required to prepare its Environmental Report in cooperation with the RUS's preparation of its Environmental Impact Statement required by the National Environmental Policy Act, 42 USC Sections 4321-61 (NEPA).

The Applicants' website at <http://www.capx2020.com/Regulatory/Federal/index.html> includes the following statement:

“Federal Regulatory Filings

There are primarily two permitting and approval processes that involve federal agencies for the Cap X 2020 transmission line proposals. Some of the Cap X 2020 partners will be seeking loans from the Department of Agriculture's Rural Utility Service. In addition permits are required by the U.S. Army Corps of Engineers before transmission lines can cross major Rivers. Before any permits or approvals can be granted by federal agencies, an Environmental Impact Statement is prepared.”

This statement is accordance with RUS Rule 1794.24, which clarifies that that the RUS must evaluate a proposed transmission line project greater than 220 kV and longer than 25 miles to determine whether an



EIS is required. 7 CFR 1794.24¹. Given the magnitude of the Cap X 2020 proposal, it is certain that the RUS must prepare an EIS.

Under NEPA the RUS is required to consider alternatives to energy projects, including but not limited to alternatives such as energy conservation and efficiency, renewable energy, and non-renewable energy projects, as well as alternative transmission line configurations designed to serve these power supply alternatives. This analysis is markedly similar in scope to the alternatives analysis that the Department of Commerce must include in its Environmental Report². While the State of Minnesota has determined that evaluation of project alternatives and route alternatives may be accomplished separately, the federal government has not.

Minnesota Rule 4410.3900 states the “[g]overnmental units shall cooperate with federal agencies to the fullest extent possible to reduce duplication between Minnesota Statutes, chapter 116D, and [NEPA].” Because applications for high-voltage power lines are not exempt from the requirements of Rule 4410.3900 by Rule 4410.3600, Rule 4410.3900 is applicable such that the Department of Commerce “shall cooperate with federal agencies to the fullest extent possible.” (Emphasis added.) Since this is a mandatory requirement, the Department of Commerce has no option but to cooperate with the RUS in a joint environmental review if doing so is “possible.”

It is entirely “possible” for the Department of Commerce to prepare its Environmental Report in cooperation with the RUS; therefore, Rule 4410.3900 requires that it do so. Nothing in Minnesota law prohibits consideration of all environmental impacts of high voltage transmission lines at the same time. Cooperation in environmental review at an earlier stage in project development would result in earlier review of a broader array of environmental impacts, but this would only enhance the Public Utilities Commission’s ability to consider environmental impacts in its decision about whether to grant a Certificate of Need, which for a project of this scope would be prudent.

A failure to coordinate preparation of the RUS NEPA EIS and preparation of the Department of Commerce Environmental Report would not represent cooperation with federal agencies to the fullest extent possible and therefore would appear to be a violation of Minnesota Rule 4410.3900. Such failure in cooperation would result in duplication of effort because a consideration of project alternatives such as energy conservation and efficiency, provision of power through non-transmission alternatives, and alternative transmission designs would be considered twice, first in the state Environmental Report and then in a subsequent federal EIS. Such duplication would be wasteful and could result in a substantial delay of the project.

¹ (<http://www.usda.gov/rus/water/regs/Amended%201794.pdf>.)

² See e.g., Alternative Evaluation Study prepared for Dairyland Cooperative Power as part of the EIS for the proposed construction and operation of a coal-fired electric generation facility, consisting of a single 400 Megawatt (MW) unit, at a site in Mitchell or Chickasaw Counties, Iowa. Available at <http://www.usda.gov/rus/water/ees/pdf/dairyland%20alternativetechnology.pdf>.



Although it could be argued that the RUS EIS should be coordinated with the state's subsequent route-related environmental review, the nature of this later review does not include the entire scope of the required RUS EIS with regard to alternatives and therefore the state route-related environmental review

will differ substantially from the review that will be conducted by the RUS. Moreover, to the extent that financing of Cap X 2020 is dependent on the RUS federal loan program, such federal environmental review is inevitable. Should the Cap X 2020 applicants claim that all participating utilities can participate without recourse to federal loans, the Application should clarify how this is possible and what effect alternate forms of financing would have on project viability.

The State's ability to comply with its new RES, greenhouse gas emissions law, and energy conservation laws, and the state policy related to promoting community-owned renewable energy generation and its related transmission line siting and design needs requires a greater analysis of project alternatives under MEPA by the Department of Commerce to assess global warming impacts. Precise route configuration is directly related to a transmission line's ability to facilitate renewable energy delivery to market because distance from renewable energy resources to transmission lines impacts interconnection costs that in turn can significantly impact the financial viability of renewable energy development claimed to be benefited by the Cap X 2020 proposal. The amount of renewable energy that a transmission line will facilitate has a direct effect on the line's net global climate change impacts. Therefore, the route and configuration of a transmission line bears a close relationship to its global climate change impacts. As such, a meaningful comparison of the global climate change impacts of alternatives to the project (such as alternative transmission line configurations intended to better serve renewable energy) can only be made with knowledge of preferred routes. The efficiency of bifurcating an analysis of alternatives to the project from alternatives related to route would, therefore, appear to be in doubt.

Therefore, the Sierra Club suggests that the Department of Commerce coordinate the preparation of its Environmental Report with the federal process by immediately contacting the RUS and requesting joint preparation of its Environmental Report with the RUS EIS, including joint scoping efforts. If the Cap X 2020 applicants that intend to apply for RUS loans have not already done so, as a condition of their application the Commission might require that the applicants immediately submit loan applications to the RUS so that the RUS may begin work on the federal EIS and coordinate its efforts with the Department of Commerce.

I. Alternatives that should be included in the Environmental Report

For each of the three proposed transmission lines being considered, the Environmental Report should evaluate a range of alternatives that include energy conservation measures, possible renewable energy sources, and possible fossil fuel-fired energy sources, evaluate these energy supply options in one or more alternatives with different combinations of energy supply options, and identify the combination of these sources of energy that best meet project objectives. Only after doing this analysis is it appropriate to evaluate high-voltage transmission alternatives. It may be that one or more of these energy source alternatives obviates the need for any high-voltage transmission enhancements in one or more Project areas. In such case, one or more of the Project lines would not be needed.



As it considers alternatives, the Environmental Report should also evaluate the environmental impacts of likely possible generation sources for the Project, including renewable energy, new or expanded coal-fired power plants, new or expanded nuclear power plants, and new or expanded natural gas generation. The likely mix of generation sources can be accurately predicted based on FERC open-access tariff rules and relative generation costs.

II. Impacts that should be discussed in the Environmental Report

Building nearly 700 miles of high-voltage transmission lines will have significant impacts on the human and natural environment. Although exact routes for the lines are not yet known, their impacts can still be evaluated in a generic manner and should be included in the Environmental Report.

To assist in the assessment of Project impacts, we have attached an Appendix that lists sensitive, natural or protected areas and features that are within the current Project route corridors. While many of these areas and features will be dropped as the route corridors shrink, the current list gives an idea of the kinds of impacts that could be expected overall from the Project.

The following are impacts that the North Star Chapter of the Sierra Club believes should be included in the Environmental Report being prepared by the Department of Commerce:

Impacts on Human Health

The Environmental Report should discuss the impacts of Project construction, operation, and maintenance on human health, including, but not limited to the impacts of noise, fugitive dust, exposure to contaminants or toxic materials, and exposure to electromagnetic fields. These Project impacts should be compared to impacts of alternatives to the Project.

Impacts on Environmental Justice

Regardless of the Project's exact route, there will be impacts to the Prairie Island Indian Community. There may also be impacts to the Upper Sioux and Lower Sioux Indian Communities. The Environmental Report should discuss the impacts of Project construction, operation, and maintenance on communities where low-income or minority populations are disproportionately represented. Much of the Project will cross through rural areas, which are generally home to low-income families. The Environmental Justice impacts of the Project should be compared to impacts of alternatives to the Project.

Impacts on Global Climate Change

The North Star chapter of the Sierra Club fervently hopes that if the Project is built, it will be used solely to create greater market access for renewable energy. However, renewable-energy facilities that would use the Project transmission lines are not in operation, but rather are speculative in nature. Therefore, construction of the Project may increase the use of existing coal-fired power plants and promote the construction of new or expanded coal-fired power plants. The emissions from these plants would contribute to global climate change.

To understand the potential impact of the Project on global climate change, the Environmental Report for the Project should assess the global climate change impacts of the use of the Project by both coal-fired



and renewable-energy power plants, as well as the impacts of increased generation and use of electricity. These Project impacts should be compared to impacts of alternatives to the Project.

Given the State of Minnesota's demonstrated commitment to reduce global warming gas emissions, the Environmental Report for the Project should review potential sources of electricity to be transmitted on the Project and assess the propensity of the Project to either promote or discourage the development of renewable-energy power plants, on the one hand, and the use of the Project by existing and future coal-fuel fired power plants on the other.

The State of Minnesota has also recognized that prevention of global climate change is a priority for the State and passed laws in 2007 to help in that regard. The Environmental Report for the Project should assess the Project's impact on the ability of these laws to reduce greenhouse gas emissions.

The impacts on global climate change from greenhouse gases emitted during Project construction, operations, and maintenance should also be discussed in the Environmental Report, including, but not limited to, carbon dioxide emissions and sulfur hexafluoride emissions.

Greenhouse gas emissions during high-voltage transmission line construction can be substantial. An environmental review document published earlier this month by the California Public Utilities Commission and U.S. Bureau of Land Management in regard to a 150-mile long transmission line project in California stated, "because total construction GHG emissions exceed the GHG reductions achieved due to avoided power plant emissions over 40 years of transmission line operation, the Proposed Project would cause an overall net increase in GHG emissions and a significant climate change impact."³ This was a surprise to many people who thought that because the line was said to be intended to access renewable energy resources, it would cause a net decrease in greenhouse gas emissions.

Given that this first phase of the CAP X 2020 Project would require nearly 700 miles of transmission lines to be constructed—more than four and a half times as many miles as in California—it cannot be taken for granted that the Project, even if it were to be used solely or primarily for renewable energy, would have positive global climate change impacts.

We recognize that evaluating the global climate change impacts of transmission line construction, operations, and maintenance might not be something in which Department of Commerce analysts have had many opportunities to acquire experience. The Department may find it helpful to contact the California Public Utilities Commission manager responsible for the environmental analysis of the California transmission line referenced above, to discuss methodology:

³ California Public Utilities Commission and U.S. Bureau of Land Management. *Executive Summary of the Draft Environmental Impact Report / Environmental Impact Statement and Proposed Land Use Amendment for the proposed Sunrise Powerlink transmission line project*. Published January 3, 2008. Page ES-25. Available at <http://www.cpuc.ca.gov/Environment/info/aspen/sunrise/deir/02%20Exec%20Summary.pdf>.



Ms. Billie Blanchard
Project Manager
Energy Division CEQA Unit
Public Utilities Commission

505 Van Ness Avenue
San Francisco, CA 94102-3298
bcb@cpuc.ca.gov
(415) 703-2068

Impacts of Climate Change on Project Design and Construction

The impact of changing and changed climate, temperature, storm patterns, frequency and intensity on the construction and operation of each of the three proposed 345 kV transmission lines over its lifetime needs to be evaluated. Published reports of power disruptions from storms indicate that the future of overhead power transmission needs to be reviewed. Design and construction may need to be modified. Comparing these to alternatives to the Project is necessary.

Other Impacts on Air Quality

The Environmental Report should discuss the other impacts of Project construction, operation, and maintenance on air quality, including, but not limited to, exhaust emissions and generation of dust. The Project would also utilize available limits of regulated pollutants, thus impacting other businesses and industries that may be competing for these spaces. The air quality impacts of the Project should be compared to impacts of alternatives to the Project.

Impacts of Increased Availability of Electricity

The construction of these lines is intended to make available increased electricity in Minnesota and other areas. The environmental effects of the increased generation of this electricity and the increased use thereof are reasonably foreseeable impacts of the project. NEPA and state law clearly mandate that where there are reasonably foreseeable impacts to the environment of a project, they must be identified and examined⁴.

Impacts on Agricultural Sustainability

The Project will introduce high-voltage transmission lines to agricultural areas, and impact on domestic animals including dairy, beef cattle, hogs, and others needs to be evaluated as part of the environmental impact. Further, the project has the potential to compete with sustainable energy production utilizing biodigesters on farms, cultivation of alternative biomass crops due to possible fire danger to the project, and the construction and operation of lower-voltage feeder lines. These Project impacts need to be compared to impacts of alternatives to the Project.

Impacts on Vegetation

The Environmental Report should discuss the impacts of Project construction, operation, and maintenance on vegetation, including, but not limited to, the impacts of rights-of-way, access roads, ancillary support

⁴ Mid States Coalition for Progress v. Surface Transp. Bd., 345 F.3d 520 (8th Cir.2003)



facilities, and materials mining for construction (e.g., gravel, sand, rock). These Project impacts should be compared to impacts of alternatives to the Project.

Impacts on Wildlife

The Environmental Report should discuss the impacts of Project construction, operation, and maintenance on wildlife in general, including, but not limited to, habitat reduction, alteration, or fragmentation; introduction of invasive species; injury or mortality of wildlife; erosion and runoff; fugitive dust; noise; exposure to contaminants or toxic materials; exposure to electromagnetic fields, and interference with behavioral activities. These Project impacts should be compared to impacts of alternatives to the Project.

Impacts on Avian Species

The Environmental Report should discuss the impacts of Project construction, operation, and maintenance on avian species in general, including, but not limited to, impacts of habitat reduction, alteration, or fragmentation; injury or mortality of birds or bats; erosion and runoff; fugitive dust; noise; exposure to contaminants or toxic materials; exposure to electromagnetic fields; and interference with behavioral activities. These Project impacts should be compared to impacts of alternatives to the Project.

Impacts on Aquatic Biota

The Environmental Report should assess the impacts of Project construction, operation, and maintenance on aquatic biota in general, including, but not limited to, impacts of changes in water surface flow patterns, deposition of sediment in surface water bodies, changes in water quality or temperature, loss of riparian vegetation, exposure to contaminants or toxic materials, exposure to electromagnetic fields, restrictions to fish movements, injury or mortality of aquatic biota, and changes in human access to water bodies. These Project impacts should be compared to impacts of alternatives to the Project.

Impacts on Wetlands

The Environmental Report should evaluate the impacts of Project construction, operation, and maintenance on wetlands, including, but not limited to, the impacts of rights-of-way, access roads, staging and laydown areas, substations, other ancillary support facilities, and materials mining for construction (e.g., gravel, sand, rock). The impacts to wetlands that should be assessed include, but are not limited to, hydrologic impacts, plant community impacts, soil impacts, water-quality and water-temperature impacts, biodiversity impacts, and wildlife impacts. These Project impacts should be compared to impacts of alternatives to the Project.

Impacts on Forests

The Environmental Report should assess the impacts of Project construction, operation, and maintenance on forests, including, but not limited to, the impacts of rights-of-way, access roads, staging and laydown areas, substations, other ancillary support facilities, and materials mining for construction (e.g., gravel, sand, rock). These Project impacts should be compared to impacts of alternatives to the Project.

Impacts on Native Prairie Remnants



The Environmental Report should assess the impacts of Project construction, operation, and maintenance on native prairie remnants, including, but not limited to, the impacts of rights-of-way, access roads, staging and laydown areas, substations, other ancillary support facilities, and materials mining for construction (e.g., gravel, sand, rock). These Project impacts should be compared to impacts of alternatives to the Project.

Impacts on Water Resources

The Environmental Report should assess the impacts of Project construction, operation, and maintenance on surface water resources, groundwater, aquifers, and floodplains. These Project impacts should be compared to impacts of alternatives to the Project.

Impacts on Geological Resources

Construction of the Project will require the use of sand and gravel and/or crushed rock, thus affecting geological resources. The materials are typically used in access roads, staging areas, stream banks, and other construction sites and are for concrete, gravel pads, road beds, stream bank protection, and building materials. Blasting may also be necessary for right-of-way construction. The Environmental Report should assess the impacts of Project construction, operation, and maintenance on geological resources. These Project impacts should be compared to impacts of alternatives to the Project.

Impacts on Historical and Cultural Resources

The Environmental Report should assess the impacts of Project construction, operation, and maintenance on historical and cultural resources, including, but not limited to impacts of earthmoving; ground clearing; increased vehicular and pedestrian traffic; changes in human access to historical and cultural resources; visual impacts on sacred landscapes, historic trails, or other viewsheds; and noise impacts on sacred landscapes, historic trails, or other historically or culturally important features; as well as impacts on burial sites, archeological sites, religiously or historically significant sites, traditional plant gathering areas, and habitats of culturally significant animals. These Project impacts should be compared to impacts of alternatives to the Project.

Impacts on Visual Resources

The Environmental Report should assess the impacts of Project construction, operation, and maintenance on visual resources, including, but not limited to, the visual impacts of transmission lines and equipment, access roads, staging and laydown areas, substations, other ancillary support facilities, vegetation clearing in rights-of-way, and materials mining for construction (e.g., gravel, sand, rock).. These Project impacts should be compared to impacts of alternatives to the Project.

Impacts on Recreation

The route corridors in the Project Application include lakes, rivers, trout streams, other waterways, state parks, county parks, national wildlife refuges, scientific and natural areas, wildlife management areas, and other places used by the public for recreation. Because high-voltage transmission lines can significantly adversely affect the qualities that attract people to areas used for recreation, the Environmental Report should assess the impacts of Project construction, operation, and maintenance on recreation. These Project impacts should be compared to impacts of alternatives to the Project.



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Sierra Club North Star Chapter
2327 East Franklin Avenue, Minneapolis, MN 55406
TEL: 612-659-9124 FAX: 612-659-9129 www.northstar.sierraclub.org

In addition, the North Star chapter of the Sierra Club would like to receive a hard copy of the Environmental Report when it is ready. Please address the Report to:

Clean Air and Renewable Energy Committee
North Star Chapter, Sierra Club
2327 East Franklin, Avenue
Minneapolis, MN 55406

Thank you for your consideration of our comments.

Sincerely,

Christopher Childs
Conservation Chair
North Star Chapter, Sierra Club



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Appendix:

Sensitive, natural or protected areas and features within the current CAP X 2020 route corridors



CAP X 2020: Brookings County, SD to Twin Cities line

All the areas and features below are shown in the route corridor maps filed in the CAP X 2020 project application. Areas and features that appear in **bold** are listed by name in the application narrative. Areas and features in regular font only appear on the route corridor maps. There are many additional water features that appear on the route corridor maps, but are not listed below due to time constraints.

Allsborg Wildlife Management Area
Altnow Marsh Wildlife Management Area
Altona Wildlife Management Area
Amiret Wildlife Management Area
Anderson Lake County Park
Anderson Lake Wildlife Management Area
Arlington Wildlife Management Area
Ash Lake Wildlife Management Area
Assumption Wildlife Management Area
Baker's Lake Wildlife Management Area
Bardel's Marsh Wildlife Management Area
Baylor County Park
Baylor Regional Park
Beaver Falls Wildlife Management Area
Black Rush Lake Waterfowl Production Area
Blue Devil Valley Scientific and Natural Area
Blue Wing Wildlife Management Area
Bob Gehlen Wildlife Management Area
Boerner Wildlife Management Area
Boiling Spring Creek
Boesch Wildlife Management Area
Boon Lake
Boon Lake Slough Wildlife Management Area
Boon Lake Wildlife Management Area
Boon Lake Waterfowl Production Area
Boone Slough Wildlife Management Area
Bossuyt Wildlife Management Area
Boyd Sartell Wildlife Management Area
Braake Wildlife Management Area
Bradshaw Lake Wildlife Management Area
Brawner Lake Wildlife Management Area
Bur Oak Wildlife Management Area
Camden State Park
C. and V. Schmidt Wildlife Management Area
Cannon River
Carver Creek
Cedar Mountain Scientific and Natural Area
Cedar Rock Wildlife Management Area



Chadderdon Wildlife Management Area
Chain-O-Sloughs Wildlife Management Area
Chamberlain Woods Scientific and Natural Area
Chen Bay Wildlife Management Area
Christine Wildlife Management Area
Chub Lake
Chub Lake Wildlife Management Area
Chub River
Clark Lake Wildlife Management Area
Clifton Wildlife Management Area
Collaris Wildlife Management Area
Collinson Wildlife Management Area
Coon Creek Wildlife Management Area
Coot Wildlife Management Area
Cordova Wildlife Management Area
Cottonwood Lake
County Ditch 60 (Lyon County)
Credit River
Credit River wetland
Crow River
Crow Wing River II Wildlife Management Area
Daak Wildlife Management Area
Dalton Johnson Wildlife Management Area
Daub's Lake Wildlife Management Area
Dead Coon Creek
Dead Coon Wildlife Management Area
Deer Creek (SD)
Deer Lane Wildlife Management Area
Delhi Wildlife Management Area
Deutsch Wildlife Management Area
Deutz Wildlife Management Area
Diamond Lake Wildlife Management Area
Discors Wildlife Management Area
Dorer Wildlife Management Area
Dutch Creek
Dwire Wildlife Management Area
Dybsand Wildlife Management Area
Elmer Weltz Wildlife Management Area
Emerald Wildlife Management Area
Esker Wildlife Management Area
Expectation Wildlife Management Area
Factor Wildlife Management Area
Faxon Wildlife Management Area
Faxvog Wildlife Management Area



Fickling Waterfowl Production Area
Flandreau State Park
Fort Ridgely State Park
Frank Breen Wildlife Management Area
Fritsche Creek Wildlife Management Area
Furgamme Wildlife Management Area
Gadwall Wildlife Management Area
Gales Wildlife Management Area
Garvin Wildlife Management Area
Glencoe Izaak Walton League Game Refuge
Gneiss Outcrops Scientific and Natural Area
Good Medicine Wildlife Management Area
Grandview Wildlife Management Area
Greenhead Wildlife Management Area
Green Valley Wildlife Management Area
Grundmeyer Wildlife Management Area
Halva Marsh Wildlife Management Area
Hansonville Wildlife Management Area
Happy Hollow Wildlife Management Area
Hawks Nest Wildlife Management Area
Hazel Creek
Hendricks Wildlife Management Area
Herschberger Wildlife Management Area
Hoffman Creek Wildlife Management Area
Hole in the Mt. Wildlife Management Area
Hope Wildlife Management Area
Horse Slough Wildlife Management Area
Indian Lake Wildlife Management Area
Ivanhoe Wildlife Management Area
Jacobsen Wildlife Management Area
Johnsonville Wildlife Management Area
Joseph R. Brown State Wayside Park
Katsota Prairie Scientific and Natural Area
Klabunde Wildlife Management Area
Kohl's Wildlife Management Area
Kvermo Wildlife Management Area
Karnitz Wildlife Management Area
Kujas Lake Wildlife Management Area
Lake Benton
Lake Hendricks (SD)
Lake Marion County Park
Lake Yankton Wildlife Management Area
Legacy Wildlife Management Area
Little Lake Wildlife Management Area



Luescher-Barnum Wildlife Management Area

Lyndwood Wildlife Management Area

Lyons Wildlife Management Area

Lyrock Wildlife Management Area

Lines Wildlife Management Area

Mammenga Wildlife Management Area

Mark and Ursel Smith Wildlife Management Area

Minnesota River (recreational river near the Minnesota Valley substation; also scenic river state scenic river, state canoe route, and scenic canoe trail in portions)

Mack County Park

Mahoney's Wildlife Management Area

Marsh Wildlife Management Area

McLeod County PF Wildlife Management Area

Meadow Creek Wildlife Management Area

Michel Wildlife Management Area

Milest Wildlife Management Area

Minnesota River Valley Scenic Byway

Minnesota Valley State Park

Minnesota Valley State Recreation Area (Lawrence Headquarters, Rush Creek area)

Minnesota Valley U.S. Fish and Wildlife Service easements (near the Minnesota Valley substation)

Minnesota Valley Wildlife Refuge

Minnriver Wildlife Management Area

Muldental Wildlife Management Area

Murphy Wildlife Management Area

Muskrat Junction Wildlife Management Area

Neudecker Wildlife Management Area

Norgaard Wildlife Management Area

Norwegian Grove Wildlife Management Area

Nyroca Flats Wildlife Management Area

Oak Isle Wildlife Management Area

O'Brien Wildlife Management Area

Ottawa Wildlife Management Area

Oxbow Lake

Paddy Marsh Wildlife Management Area

Pato Wildlife Management Area

Patterson Wildlife Management Area

Paulson Marsh Wildlife Management Area

Peat Bog Wildlife Management Area

Pebbles Wildlife Management Area

Penn Wildlife Management Area

PF-Module #1 Wildlife Management Area

PF-Module #3 Wildlife Management Area

Pleasant Lake

Poposki Wildlife Management Area



Pothole Wildlife Management Area
Prohels Woods Wildlife Management Area
Prairie Dell Wildlife Management Area
Prairie Heritage Wildlife Management Area
Prairie Marshes Wildlife Management Area
Prairie remnants along the VNSF Railroad tracks near Cottonwood, MN
Preston Lake
Ramsey Creek (designated trout stream)
Ras-Lynn Wildlife Management Area
Raven Wildlife Management Area
Redwood River
Revanche Wildlife Management Area
Rice Lake
Richter's Woods Park
Ringneck Ravine Wildlife Management Area
River Valley Wildlife Management Area
Robert J. Lick Wildlife Management Area
Rock Lake
Rock Lake Wildlife Management Area
Rohlik's Slough Wildlife Management Area
Rolling Hills Wildlife Management Area
Romberg Wildlife Management Area
Rooster Flats Wildlife Management Area
Rosaasen Slough Wildlife Management Area
Roseneau-Lambrecht Wildlife Management Area
Rost Wildlife Management Area
Russell Wildlife Management Area
Sacred Heart Wildlife Management Area
Salix Wildlife Management Area
Sandy Slough Wildlife Management Area
Sautter Marsh Wildlife Management Area
Schindel Wildlife Management Area
Schneewind Wildlife Management Area
Schmalz Wildlife Management Area
Shaokatan Wildlife Management Area
SE Clifton Wildlife Management Area
Severance Lake Wildlife Management Area
Sham Lake Wildlife Management Area
Sheas Wildlife Management Area
Sheas Lake Wildlife Management Area
Sheridan Wildlife Management Area
Sibley Wildlife Management Area
Sioux Lookout Wildlife Management Area
Sioux Prairie Wildlife Management Area



Sodus Wildlife Management Area
Sokota Wildlife Management Area
Somson Wildlife Management Area
South Branch Vermillion River
South Branch Yellow Medicine River
Spannaus Wildlife Management Area
Spanton Wildlife Management Area
Spartina Wildlife Management Area
Spiering Wildlife Management Area
Spring Creek
St. Patrick Wildlife Management Area
St. Thomas Lake Wildlife Management Area
Suhr Wildlife Management Area
Sumter Wildlife Management Area
Swan Lake Wildlife Management Area
Swede's Forest Scientific and Natural Area
Tangential Wildlife Management Area
Ten Sloughs Wildlife Management Area
Thostenson Wildlife Management Area
Three Mile Creek
Tiger Lake Wildlife Management Area
Tillemans Wildlife Management Area
Timms Wildlife Management Area
Two Sloughs Wildlife Management Area
Tyler Wildlife Management Area
Tyson Lake
Upper Sioux Agency State Park
Vale Wildlife Management Area
Ward Lake Wildlife Management Area
Warsaw Wildlife Management Area
Waterbury Wildlife Management Area
Weeks Lake Wildlife Management Area
Westline Wildlife Management Area
White Prairie Wildlife Management Area
Willow Lake Wildlife Management Area
Windot Wildlife Management Area
Winfield Wildlife Management Area
Vermillion River
Yellow Medicine River



CAP X 2020: Fargo to Monticello line:

All the areas and features below are listed by name in the application narrative. There are many other sensitive resources that appear on the route corridor maps but are not listed here. Because the comment period for this scoping letter was scheduled so that it fell over the winter holidays, thus limiting the public's ability to respond, there was not time to compile a more complete list similar to the Brookings County to Twin Cities list.

Birch Lake State Forest
Blair Pond Wildlife Management Area
Buffalo River
Buffalo River State Park
Cater Homestead Prairie Scientific and Natural Area
Chippewa River
Clear Lake Scientific and Natural Area
Clearwater River
Crow Wing River
Elk River
Forada Wildlife Management Area
Glacial Lakes State Park
Glacial Ridge Scenic Byway
Harry W. Cater Homestead Prairie Scientific and Natural Area
King of Trails Scenic Byway
Lake Carlos State Park
Lake Maria State Park
Long Prairie River
Mississippi River (designated scenic river north of Clearwater River)
Mustinka River
North Fork of the Crow River
Otter Tail River
Otter Trail Scenic Byway
Pomme De Terre River
Quarry Park Scientific and Natural Area
Red River
Rice Lake Savanna Scientific and Natural Area
Sand Prairie Wildlife Management Area
Sauk River
Sheyenne River
Waite Park Scientific and Natural Area
Western Wild Rice River



CAP X 2020: Twin Cities (Prairie Island) to La Crosse, WI line

All the areas and features below are listed by name in the application narrative. There are many other sensitive resources that appear on the route corridor maps but are not listed here. Because the comment period for this scoping letter was scheduled so that it fell over the winter holidays, thus limiting the public's ability to respond, there was not time to compile a more complete list similar to the Brookings County to Twin Cities list.

Amsterdam Prairie (WI)

Bell Creek

Black River (WI)

Brice Prairie (WI)

Cannon River (a scenic river that will be crossed when the line leaves the Prairie Island Indian Community and heads south toward Rochester)

Cannon River Turtle Scientific and Natural Area

Dry Run Creek

Garvin Brook

Great River Bluff State Park

Great River Road Scenic Byway

Great River Trail Prairie (WI)

Harkcom Creek

Hay Creek

Holden West Fen

Kellogg-Weaver Dunes Scientific and Natural Area

Kings and Queens Bluff Scientific and Natural Area

La Crosse River Trail Prairie (WI)

Lake Byllesby

Lake Onalaska

Lake Winona

Lake Zumbro

McCarthy Lake Wildlife Management Area

McCarthy Wildlife Management Area

Merrick State Park (WI)

Midway Railroad Prairie (WI)

Oronoco Prairie

Oronoco Prairie Scientific and Natural Area

Oxbow County Park

Perrot Ridge Trail (WI)

Perrot State Park (WI)

Pine River Creek

Plum Creek

Red Wing Fen

RJD Memorial Hardwood Forest

Root River

Silver Creek



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Tamarack Creek
Thompkins Creek
Tompkins Creek
Trempealeau National Wildlife Refuge
Trempealeau River
Upper Mississippi River Wildlife and Fish Refuge
Van Loon State Wildlife Area
Vermillion River
Waumandee River (WI)
Whitewater River
Whitewater State Park (identified as an area to avoid—other state parks in the Project route corridors are not so identified)
Whitewater Wildlife Management Area
Wisconsin Great River Road
Whitman Dam State Wildlife Area (WI)
Zumbro Lake
Zumbro River

David Birkholz

From: Cook, Jeanmarie [JCOOK@csbsju.edu]
Sent: Monday, January 14, 2008 11:03 AM
To: David.Birkholz@state.mn.us
Subject: PUC# 06-1115 - St. Cloud-Fargo concerns

Dear Mr. Birkholz:

I write to raise concerns and questions about the proposed power lines in the CAPX2020 Application. First, is the power line really necessary? I would like to see evidence that this line is necessary. Further, could the power needs of the St. Cloud area be better handled in other (less intrusive) ways?

Second, I would like to know what are the system alternatives (supply-side and demand-side) to the CAPX 2020 Proposal. The proposal information simply states the powerlines are needed, but has not explained clearly the alternatives to this proposal. I do not favor jumping to this proposal without adequately exploring or even knowing the alternatives.

Third, I oppose the use of these power lines because they will scar the landscape. The Avon and Collegeville areas have concentrations of residential areas that would be seriously harmed by this intrusive power line. Property values would be adversely affected by this proposal. Further, the natural area and bird life would be adversely affected as well.

I raise these questions and ask that your department provide us with more information and for the department to do additional study for this proposal. This proposal is using the traditional paradigm for delivering energy and one that should be challenged. I do not believe that the benefits outweigh the cost of this line. By cost I am referring to much more than the cost to the power companies – I am referring to the cost to the property owners, to the community for loss of natural beauty, and to the wildlife. The community is not being adequately compensated for those losses.

Sincerely,
Jeanne Cook
Collegeville Township, MN

North American Water Office
P.O. Box 174
Lake Elmo, MN 55042

Institute for Local Self Reliance
1313 5th St SE
Minneapolis, Minnesota 55414

January 14, 2008

Mr. David Birkholz
Minnesota Department of Commerce
85 7th Place East Suite 500
St. Paul, MN 55101

RE: Comments of the North American Water Office and the Institute for Local Self Reliance Regarding The Scope of the Environmental Review In the Matter of the Xcel Energy and Great River Energy Certificate of Need Application for Three 345 kV Transmission Lines in Minnesota

MPUC Docket ET-2, E-002/CN-06-1115
OAH Docket 15-21500-19350-2

Dear Mr. Birkholz:

Regulatory oversight of the electric utility industry entertains the possibility that public interests do not necessarily coincide with industry proposals, including the CAPX 2020 proposal. NAWO and ILSR contend that in this instance, based on overwhelming evidence, they do not. We offer these comments on the Scope of the Environmental Report (ER) with the hope that they will help guide the production of an ER that is not simply a coronation of the industry's habitual desire, but rather, one that takes seriously the requirement to examine alternatives, and helps us all search out that set of transmission infrastructure enhancements that truly does best serve rapidly evolving societal interests.

To that end, NAWO and ILSR support many of the points made in the January 13, 2008 Comments submitted by United Citizens Action Network (UCAN). In particular, we support UCAN's expressed concerns about improper and inadequate notification to affected landowners; the need for a full analysis of the economic implications on ratepayers of the CAPX 2020 projects; analysis of the environmental consequences associated with additional coal-fired electrical generation capacity that the CAPX 2020 proposal contemplates; and, issues pertaining to further expansion of the electric transmission grid to transmit much more power from west to east. We also strongly support UCAN's assertions on the treatment of project alternatives that must be addressed in the ER.

Minnesota Statutes 216B.243 subd. 3 provide a list of demand and supply-side alternatives that must be compared in the ER on a cost/benefit basis with the proposed CAPX 2020 projects. The ER must report, in transparent fashion, the results of the cost/benefit analyses for each item specified by law for each of the proposed projects, independently. Most importantly, the alternatives packages must be assembled from combinations of generation, transmission, and conservation/demand-side options deemed to be most cost-effective and responsive to the specified needs.

The set of alternatives analyzed must include a 100% Dispersed Generation Alternative. Such a comparison is especially illuminating because of the opportunities, and the potential value of those opportunities identified by the West Central Minnesota C-BED Transmission Report. The existence of these opportunities, and their value compared to the Applicants' proposal, are reinforced by the fact that the 2007 Minnesota Legislature found enough value in the West Central Study to require similar analysis state-wide. The legislation calls for a total of 1,200 MW or more of new distributed and dispersed generation capacity to be strategically located throughout the five Transmission Planning Zones, and establishes a Technical Review Committee to oversee the study.

Further, the 2007 Minnesota Legislature also required transmission planning for the Renewable Energy Standard, and called for that planning to build on the Wind Integration Study and models that incorporate distributed and dispersed generation potential. It is worth noting that the Wind Integration Study itself was able to support the conclusions it did because the generation inputs were dispersed. The examination of a Dispersed Generation Alternative is consistent with Minnesota Rules Chapter 7849.7060 subp. 1(B).

In this same vein, the ER should examine in considerable detail how much of the Renewable Energy Standard obligation can be met without building new backbone transmission. The Applicants have good reason to think that 2012 RES goals can be met without any additional very large powerlines. The ER must therefore answer the question of how much more is possible. How much more could be accomplished by 2012 with the proper set of lower voltage and substation transformer enhancements? How much more in each of the subsequent years? What would be the cost of such enhancements compared to the cost of the CAPX 2020 proposals, including a comparison of the infrastructure costs on a per megawatt of installed generation capacity basis, for mandated renewable generation capacity.

The ER should examine the economic impact of the Applicants' proposal on Minnesota rate payers, utility by utility. The analysis should cover a range of ownership percentages and include consideration of rate impacts if a Transco ends up owning some or all of the CAPX 2020 facilities.

The Application identifies specific areas of local reliability concern. The alternatives analysis of the ER must examine and compare to the Applicants' proposal, tailored Demand Side Management and Distributed Generation options capable of addressing each of those local reliability concerns. Also consistent with Minnesota Rules Chapter 7849.7060 subd. 1(B), this analysis must include using facilities of different

sizes and upgrading existing facilities in a manner capable of addressing the identified concerns regarding the performance of the electric utility system.

Minnesota Rules Chapter 7849.7030 requires the ER to contain information on the human and environmental impacts of the proposed CAPX 2020 projects compared to the alternatives. It is now firmly established by Minnesota C-BED Statutes that the value of local economic benefits to Minnesota taxpayers and ratepayers resulting from renewable energy development is greater with local ownership than is otherwise the case. Further, public policy preference in statute seeks to capture those benefits for Minnesotans whenever possible, and local C-BED ownership is strongly correlated with distributed and dispersed generation scenarios. Meanwhile, the CAPX 2020 projects will cause additional adverse environmental impacts from fossil fuel corporate owned facilities located out of state. To satisfy Minnesota Rules Chapter 7849.7030, the ER must therefore include a comparison of economic and environmental benefits that would accrue to Minnesotans with local ownership in the dispersed scenario with the costs and adverse impacts attached to the CAPX 2020 proposal. This analysis should include and clearly specify the cost of transmission in the dispersed alternative compared to the cost of transmission as proposed by the Applicants.

This analysis should be new and independent, and not based on the data in the Application. It should be quantitative in nature to the depth that a quantitative comparison, including the socio-economic impacts of the proposed projects with alternatives based on local ownership, is readily apparent in the ER.

In determining the costs and adverse impacts of fossil fueled out-of-state corporate-owned facilities made possible by the CAPX 2020 proposals, the ER must consider new greenhouse gas limits and associated costs of emissions placed on the electric industry by new session laws. The ER should provide transparency regarding the generation assumed in the Application, including size, type, location, and emissions. This information should be developed using a range of forecasts for environmental impacts that is based on an independent derivation of load growth forecasts based on past Integrated Resource Plans, impacts to growth to be expected because of new conservation directives, anticipated price increases to electric energy costs based on forecasts of fossil fuel prices, and greenhouse gas reduction programs.

The “No Build Option” does not mean “do nothing.” The ER should consider how, from a public interest perspective, to best meet the real needs, such as are determined by accurate forecasts, and not just say we can’t survive as a society in 2020 without the proposed projects. Considering the complexity and scale of the interconnected grid, and the vast array of universally recognized demand and supply-side options now capable of providing electric utility services, it is not acceptable to proceed with the Applicants and their regulators focused only on one, single solitary scenario for addressing the multiple perceived inadequacies of the system. The Department of Commerce is obligated by rule and statute, and by common sense and decency, to use the very significant resources at its disposal to produce an ER that actually does specify a comprehensive alternative option based on dispersed and distributed generation, lower voltage transmission and substation transformer enhancements, and demand-side programs. Unless the ER does a full and fair job of comparing costs and benefits of such

an alternative scenario with the costs and benefits, such as they are, of the Applicants' proposal, the legitimacy to the decision-making process will be severely diminished.

Respectfully submitted,

George Crocker, Executive Director
North American Water Office

Robert Dahse
30319 Wiscoy Ridge Road
Winona, MN 55987

January 11, 2008

David Birkholz
Minnesota Department of Commerce
Energy Facility Permitting
E-mail: david.birkholz@state.mn.us

Mr. Birkholz,

The informational meeting that the Minnesota Department of Commerce set up on December 13, 2007 in Winona on CapX2020 had a Q&A period where questions from the public were answered by both Commerce personnel and Utility representatives. At least four of the answers given to two themes of questions were either misleading or, based on published research, simply incorrect. The errors were so blatant and intentional that I wonder whether industry-centric personnel should even be allowed to represent their case.

The first category of questions dealt with possible health effects to both humans and livestock. The Arcadia farmer who spoke about negative health effects in his dairy herd from living near a utility substation had comments that were not perfectly pertinent since they dealt with “returning neutral ground currents” (“stray voltage”) on distribution lines, not transmission lines. But it was particularly surprising to hear from all of the Commerce and Utility personnel that there are no health effects on humans from transmission lines. While it may certainly be in the best interest of both the Utilities and the Department of Commerce to believe in this fallacy, a number of scientific studies and industry publications disagree.

The Institute of Electrical and Electronics Engineers (IEEE) periodically issues a document called “IEEE Standard for Safety Levels with Respect to Human Exposure to Electromagnetic Fields, 0-3 kHz,” last published as “IEEE Std. C95.6-2002.” On page 14 is “Table 4 – Environmental Electric Field MPEs (maximum permissible exposure), whole body exposure.” The highest MPE for the general public is supposed to be less than 5000 volts per meter (5 kV/m). The footnotes to this standard indicate that “at 5 kV/m induced spark discharges will be painful to approximately 7% of adults.” The proposed 345 kV transmission lines should have a level of between 3 kV/m and 4.8 kV/m directly under the lines, based on figures from the CapX2020 brochure entitled “Electric and Magnetic Fields (EMF): The Basics.” Allowing for variable tower and conductor heights to follow local topography, the actual levels could easily exceed 5 kV/m. The Cap X2020 publication also states that the safe exposure for those with implanted pacemakers or defibrillators is only 1 kV/m.

The failure of a life-sustaining medical device or painful shocks to a minority of the public seem to lead to the conclusion, in the Minnesota Department of Health’s “White Paper on Electric and Magnetic Field Policy and Mitigation Options,” that “the current body of evidence is insufficient to establish a cause and effect relationship between EMF and adverse health affects.” This self-serving conclusion, besides being contradictory to leading Industry publication, also neglects all

but the most obvious human health affects. The informational blinders placed on the general public by this effect-minimizing form of so-called “make-to-the door-toxicology” become more obvious when some of the replicated studies financed by electrical Utilities as far back as 1979 are considered. For instance:

1. Battelle Pacific Northwest Laboratories got funding for a study funded by EPRI, the Electric Power Research Institute, exposing multiple generations of rats to levels of AC power typically found under transmission lines. Among their findings were:
 - A. A “marked reduction” in the level of nighttime pineal gland melatonin after 3 weeks of exposure.
 - B. Significant changes in the neuromuscular system within 30 days of exposure.
 - C. Significantly increased incidence of fetal malformations.
2. The Polytechnic University of Brooklyn got funding for another rat study financed by the New York State Power Lines Project. Fetal and newly-born rats were exposed to low-power 60 Hz AC (powerline) fields for a brief period, then shielded from fields for 90 days. Testing of short-exposure rats versus controls showed that exposed rats learned more slowly and made significantly more mistakes in cognitive tests.
3. The New York State Department of Health funded a study showing that monkeys exposed to low-frequency, low-strength electromagnetic fields for 3 weeks had significantly decreased serotonin and dopamine. Dopamine recovered quickly with no exposure, but serotonin stayed abnormally low for several months.
4. The U.S. Navy’s “Project Henhouse,” funding 6 different laboratories in powerline-frequency chicken studies, reported (from 5 out of 6 labs) that “apparently very low-level, very low-frequency, pulsed magnetic fields contribute to increased abnormality incidences in early embryonic chicks.”
5. A non-governmental, non-industry study by Winters and Phillips at the Cancer Research and Treatment Center in San Antonio, Texas, reported that human cancer cells exposed for just 24 hours to low-level, 60 Hz fields had a permanent growth rate increase as high as 1600%, making powerline fields a potent cancer promoter, but not a direct cause.

Apparently, the WHO (World Health Organization), cited by the presenters at the public meeting, along with the Minn. Dept. of Health, do not consider hormone alterations, increased birth and learning defects, and accelerated cancer growth “adverse health affects”. And a few studies, even when they come from Industry funding, don’t constitute a “body of evidence”.

Most of the conclusions on EMF that are spoon-fed to the public are based not on science but on the far cheaper methods of statistical meta-analysis. Many government and industry sponsored meta-analyses of electromagnetic field related studies have relied on previous summaries and meta-analysis performed by industry-sponsored analysts. One well known example is Dr. John E. Moulder, PhD, Professor of Radiation Oncology at the Medical College of Wisconsin. His work with cancer skews all of his considerations toward ionizing radiation and the breaking of chemical bonds. So besides not even considering the most damning studies in his reviews (from an industry perspective), he ignores electromagnetic effects below those directly causing immediate cellular damage, and refuses to consider relevant epidemiological evidence to the contrary if there is presently no known theoretical model to account for it. This leads to

conclusions that usually begin with “the body of evidence suggests,” or “there is very little evidence to suggest,” as if the Truth was somehow just a majority opinion. Paraphrasing that position, opposing evidence can’t be seen, because “I have to believe it’s possible in order to see it, i.e. Believing is Seeing.” But as physicist Martin Rees famously said, “absence of evidence is not evidence of absence.” This sort of “reasoning” is just a deductive process warped to fit a convenient outcome: A) Develop a theory, B) Test the theory through observation, C) Ignore data that doesn’t fit the theory of the funding sponsors. But incomplete models of reality shouldn’t be confused for Reality itself. Or as physicist Richard Feynman said, “Nature cannot be fooled.” Granted, epidemiological studies are very expensive, controversial and lengthy. Why not simply look at all the evidence, including all of the anecdotal reports from the “canaries in the coal mine” who are EMF hypersensitized, and may be showing us what’s in store for an increasingly EMF exposed population at large?

Meta-analysis of Industry-sponsored analyses versus non-Industry shows a vast discrepancy in the conclusions about health-related EMF effects, depending strongly on who pays for the study. As with the FCC’s CRADA (cooperative research and development agreement) with the telecommunications industry, it’s clear that the “fox is in the henhouse” and that low-taxing governments can no longer possibly obtain funding for truly conclusive and unbiased studies that would adequately safeguard the public.

Increasingly, local governing bodies, more progressive state governments, and many governmental bodies overseas are adopting the “Precautionary Principle.” This puts the weight of evidence gathering on well-funded industries to prove safety, not on poorly-funded private or governmental commissions to prove danger. But as long as 1) the money comes from industry profits, 2) there’s a revolving door between industry and government, 3) the Utilities don’t even follow industry-published guidelines, 4) the public places convenience over safety, and 5) only the grossest effects are considered relevant, putting the terms “health” and “powerline EMF” in the same sentence is oxymoronic.

Regarding the second broad category of questions at the public hearing, the REAL reason for the expansion of transmission capacity, again, both Department of Commerce personnel and Utility representatives took great umbrage with any suggestion that the expansion was unnecessary, for whatever reason. Yet it was quite clear from their maps of existing and proposed production areas, transmission routes, and highest load zones that the biggest user is the Twin Cities Metro, and the power will be pumped through the “backyards” of those who use the least (or, in my case, not at all, since I’ve been “Off-grid” since 1980). There is plenty of blame to spread around. Consider the consumer advocates, Chambers of Commerce and energy-gobbling industries who lobby incessantly for cheap electricity. Or the Not-In-My-Backyard, relatively wealthy, Metro homeowners who think of conservation as a dirty word unless it’s socio-political. Or the coal, nuclear and wind industries who all want the most profitable locations for production (while demanding public subsidies). And of course the Utilities that collectively throw up their hands and proclaim there’s no other reasonable (read cheapest, politically painless, technologically unimaginative) means to obtain the ends.

As long as “cheap” and “NIMBY” prevail over “needs” and long-term “safety”, I’m certain the Utilities will successfully lobby for what they propose. But I still hold them primarily at fault for an obviously disingenuous PR push to portray Metro-centralized energy over-consumption of cheap, South Dakota, coal-generated and low-rent, SW Minnesota wind-generated electricity as a safe, time-tested means to a greener future grid. The grid will never be safe, efficient, or truly

reliable as long as it's ugly tendrils wave overhead, exposed to the vagaries of increasingly harsh weather, while increasingly losing power through the resistance caused by bigger loads, despite raising voltages to further endanger humans and wildlife. Living in a rural area, I have a keen sensitivity for "BS" and that's what I heard behind the self-serving "answers" at the public hearing.

Based on over 25 years of work installing solar PV and small wind turbines, utilizing PV and wind myself, troubleshooting electrical malfunctions, and helping other homeowners reduce both their consumption and their EMF exposure, I've concluded that the only REAL alternative to this puzzle that the Utilities claim they're caught in is to **Put the Production Where the Loads Are!** We don't need big transmission lines if the source is near the load. Isolating sources, consumers, and end-results is never a good idea. It makes people dumber, isolating them from their own analysis of causes and effects, and an uninformed populace leads to poor decision making. You want the Power? You get to look at it! Otherwise, the high-voltage EMF crossing through the countryside that feeds the Twin Cities is just the electronic version of "second-hand smoke". And we all know where the litigation on that went.

While taking personal responsibility for household electrical production and consumption is our choice, and while it's becoming exponentially popular worldwide, I realize it's not mainstream thinking - yet. Putting a positive spin on conservation is certainly politically easier than talking influential metropolitans into wind farms in the high-priced land of the suburbs. But let's not kid ourselves. It all has to happen if you take the "Seven Generations" viewpoint. A purely economic perspective is fine if you include all of the "externalized costs". The Greek roots of the word "economy" mean "management of a house." That house is now global. Nothing is external to it. If we're on this planet as stewards, not thieves and plunderers, to encourage less than our best, for our economy and our progeny, is irresponsible at the least, and criminal from an environmental, moral, scientific and hopefully one day, judicial viewpoint.

Sincerely,

Robert Dahse

David Birkholz

From: Neil C Franz [frandid@albanytel.com]
Sent: Sunday, January 13, 2008 9:56 PM
To: David.Birkholz@state.mn.us
Subject: PUC# 06-1115 St Cloud-Fargo Comment

My husband and I own land in Farming Township, Stearns County MN. I am writing to oppose the Certificate of Need for the proposed Fargo-Monticello line of the CapX2020 Project (the "Transmission Line").

My opposition is based upon the following:

1. Our energy policy is in a time of transition. The Certificate of Need should be denied and any future decision on the Transmission Line should be deferred for several years.

This is simply not the time to build such a huge transmission line. As the public just starts to grasp the realities of global warming, serious discussion of new energy policy is likely to ensue. The proposed Transmission Line is a major investment into what might well be an unwise, outdated approach to energy generation and distribution. We are certainly going to see major technology innovation in the next few years. Smaller and mid-sized local generation may become feasible. We need to consume energy more carefully. *Any or all of these might quickly invalidate the energy usage assumptions upon which this Transmission Line proposal is based.*

The peak energy needs of St Cloud and Alexandria have alternate resolutions, at least in the shorter term, that allow additional time to design our best energy system. (Assuming for argument that St Cloud truly needs more energy sources, the Monticello to St Cloud leg of the line alone would address this. But wouldn't enforced conservation and solar generation also do so.)

2. It is not environmentally sound to build the Transmission Line.

It is said that additional freeway lanes do not reduce traffic congestion; they simply allow more cars to use the road. In much the same way, the Transmission Line will make more energy available and will facilitate increased peak energy usage. I understand that much of the energy along this Transmission Line will come from coal. While its generation takes place outside our borders, its effects may very well be felt within our borders. Doesn't it make more sense to reduce our energy use during peak times or have local solar back-up?

3. It is not just to allow the forced construction of this Transmission Line over private property before effective conservation measures have been taken.

Our state government has sought to address energy conservation through consumer education and voluntary measures. In many cases, these have been mandates to the power companies, who can only encourage, not require, conservation. Such a voluntary approach is usually preferable to government regulation. But in the present case, the State's choice to not limit consumption by the public requires the more onerous government act of forcing an involuntary Transmission Line across private property. I understand the common good, and believe we must sometimes give up our individual rights or property for the good of others. But this should be a last resort. If the people of rural Minnesota are

asked to bear this Transmission Line running for miles across our landscape and lands, it should be after businesses have reduced bright all night lighting and signs. It should be when consumers no longer win awards for stringing thousands of Christmas lights around their homes. It should be after “phantom load” is banned from many appliances. It should be after excessively cool air conditioning is restricted. It should be after the State provides real incentives for wind generators and solar panels that would assist with summer peak loads. By failing to mandate conservation of energy and provide meaningful assistance for small energy generation, the State of Minnesota puts itself in the unjust position of taking property rights away from some to support the extravagance of others.

For these and for other reasons, please deny the Certificate of Need for the St Cloud to Fargo Transmission Line.

Sincerely,

Jean Didier 21568 300th Street Albany, MN 56307

Public comment for Environmental Report scope for certificate of need for the Cap-X phase one expansion plan, Docket No. ET-2, E-002/CN-06-1115.

Reliability of electrical supply is a socio-economic necessity. Of at least equal importance is the health and sustainability of the natural systems that supply not only the raw energy sources for our energy systems, but also serve as sinks for thermal, gas, chemical and particulate emission - waste streams. The purpose of environmental review is to analyze and balance these factors. By law, cost alone cannot justify the choice of a proposed solution.

In addition, broad, equitable opportunity for participation in emerging electricity markets is a goal of Federal transmission (FERC) policy and state energy policy. The ability for private, public, and aggregated interests to have access to transmission for development of both local and regional energy projects is a key socio-economic issue which the environmental report must address and evaluate.

I. Goals: The goal of this environmental report should be to assess, through evaluation of impacts and alternatives, a set of 'best combination' scenarios -- for local and regional infrastructure DESIGN solutions (size, type and timing &) -- that would result in a reliable, adequate, secure, safe, cost effective, equitable, and environmentally superior 'next generation' energy system.

The environmental report should establish and compare the 'carbon footprint' of each of the alternative design scenarios. This is necessary to address policy goals for reduction of CO₂ emissions and energy savings. The environmental analysis should provide the commission with tools sufficient to ensure that there is a basis for comparing the ability of the design alternatives – of size, type and timing – to meet, and to not undermine, these critical goals .

The environmental report must evaluate the environmental, social and economic effects, the benefits and issues, associated with distributed, dispersed, and central station design alternatives– that are brought forward in the application, party and public comments. It must also address the socio-economic effects of the various design solution alternatives, and examine the balance of benefits and costs, in light of state policy preferences for economic development and increased capacity for energy independence through community participation in renewable energy markets. The environmental review must address the question of how the preferred design solution of the utility (size, type and timing) will affect this policy goal relative to the critical issue of transmission access. And what alternative design solutions, and combinations of solutions would best meet policy goals.

II. Analysis: The environmental report must identify the features of transmission system infrastructure a) DESIGN and b) OPERATIONS that would make for an environmentally superior solution (see policy statement of Pawlenty administration), while serving the goals of reliability, security, safety and adequacy and meeting state policy goals. These features would create a foundation for the alternatives analysis, particularly scenario development of “..reasonable combinations of the alternatives” listed in the application under requirements 7849.0260 B, 1-7, and suggested by the parties for development. The analysis must not be limited by “peaking, intermediate, and baseload” assumptions, but consider at least:

- a) utility renewable energy standard goals & mandates;
- b) ancillary services opportunities including those providing constraint relief and demand side management services through dispersed and distributed generation design;
- c) and the application of both demand and supply side efficiency standards.

The analysis must also address potential *cumulative impacts* for the issues raised by agencies, parties and public. (See section on cumulative impacts).

III. Methodology:

The environmental report for the certificate of need must encompass consideration of effects upon social, economic and natural systems, utilizing the natural and social sciences as required by 116D.03, *and the insights and tools of dynamic systems analysis, as appropriate*. In its analysis, the Department should fully address the responsibilities of state agencies under 116D.03, and should involve relevant agencies in contributing to the analysis of issues raised in these comments, by other parties and in public comment.

The environmental report should utilize **wedge analysis** for both scenario building and carbon analysis. See background information at these two sites. University of Minnesota (IREE) and Humphrey Institute faculty are well versed in this analysis. Using scenario building and wedge analysis, the environmental report will provide to the public and parties an accessible and flexible model for advanced analysis of alternatives. Familiarity with these modeling tools will allow a broader set of participants to contribute to the development of the record. These tools, among others, are also well suited to the ability to combinations of alternatives. This is the strategy upon which a flexible, environmentally superior infrastructure design for an uncertain energy future -- can be modeled and built. http://en.wikipedia.org/wiki/Stabilization_Wedge_Game
<http://www.conservamerica.org/webreport8-06.html>

IV. Alternatives recommended for inclusion:

1. **Analyze the effects of the alternative of requiring the Cap-X utilities to move forward with providing to customers, substation by substation, such tools – which would allow them to contribute ancillary services, load management, and efficiency benefits to the system.** Digital tools can give people the means to monitor and adjust their electricity use, according to a report recently released and reviewed in the New York Times Business Day section, C1, January 10, 2008 (“Digital Tools Help Users Save Energy, Study Finds” by Steve Lohr). Research results from the Pacific northwest National Laboratory of the Energy Department, released on Wednesday January 9th, “suggest that if households have digital tools of set temperature and price preferences, the peak loads on utility grids could be trimmed by up to 15% a year”.
2. **Optimizing and integrating distributed generation.** Another recently released report discusses Germany's strategy of linking distributed generation in an operational network to optimize load management and management of intermittent resources. New approaches to integrating distributed systems in low voltage grid segments can create opportunities for maximizing and managing power quality, and target policy and operational priorities. Related link: <http://www3.interscience.wiley.com/cgi-bin/abstract/106570579/ABSTRACT>
3. **Including these 2 alternatives in a combined alternatives scenario** will provide useful information for the environmental report. This combination addresses the set of alternatives discussed most consistently by citizens in public meeting and community conversations:
 - a) empowering consumers with education, tools and incentives to directly manage load growth and peak demand – and
 - b) utilizing renewable distributed generation close to load, and for supply to grid (flexibly).

V. Environmental Review Considerations:

Uncertainty. The environmental report must assume and address the condition of uncertainty that dominates discussion of global warming. The report must also examine the relationship between uncertainty and the need for flexibility as critical infrastructure design and operating principles for uncertain futures. Uncertainty of fuel availability, cumulative effects of global warming trends, and socio-economic impacts should at least be analyzed and used in the alternatives analysis.

Irretrievable or irreversible commitment of resources: Continued use of fossil fuels will also reduce stocks available to future generations, and as such should be discussed in terms of irretrievable or irreversible commitment of resources. Discussions of resource availability that assume that we can utilize non-renewable resources until they are used up, the only question being how long it might take us, violate fundamental environmental principles involving present and future generations.

Cumulative Effects: The environmental report should evaluate the cumulative impacts associated with the development and operations of the Cap-X lines in combination with the potential impacts associated with other relevant activities that have occurred, are occurring or may occur in conjunction with the expanded infrastructure. The following framework was adapted from the federal EIS for replacement and expansion of the pipeline infrastructure in Louisiana, after Katrina.

The primary goal of cumulative impact analysis is to determine the magnitude and significance of the socio-economic and environmental consequences of the proposed project in the context of the cumulative effect of past, present and future projects. Cumulative impact analysis is required by environmental review. The definition of cumulative impacts is:

the impact on the environment which results from the incremental impact of the action when added to other past, present or reasonably foreseeable future actions regardless of what agency undertakes such actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

Impacts subject to cumulative impacts analysis should be identified by the ER, by determining the potential environmental impacts associated with the proposed Cap-X expansion plan, the geographic scope of the potential impacts, establishing the timeframe of the analysis, and identifying other past, present or future actions and effects of the expansion plan – that have or could affect the resources and areas of concern *identified by parties to the proceeding – and commenting members of the public.*

The ER analysis should identify activities in the region that have potential for interaction in time or space with the effects of the proposed Cap-X expansion plan. The geographic scope and time frame of the cumulative impacts analysis varies depending on the environmental item under consideration, planned or reasonably foreseeable projects overlapping with the proposed Cap-X expansion plan.

Construction and Operational Impacts: Cumulative impacts can stem from both construction and operations impacts. The proposed lines should be analyzed individually and collectively for their potential for cumulative impacts. The analysis should differentiate, when appropriate, between cumulative impacts associated with short-term, but overlapping, construction impacts and longer-term overlapping impacts associated with operations. The analysis should consider all related actions, past, present and future, including Federal, government and private actions.

Because the proposed powerlines extend over a wide geographic area, within and between states, the cumulative analysis should consider both specific potential impacts of the lines, and the general categories of the activities as they relate to the region as a whole, which they propose to serve. Ecological, social and economic effect analysis of potential cumulative impacts should consider the economic and environmental conditions and effects to Minnesota *identified by the parties and public comments*.

Alternatives analysis must address these potential cumulative impacts and develop a set of alternatives scenarios that optimizes system benefits, while providing environmentally superior solutions.

V. Effects on Local Governments and the public at large:

Large electric transmission lines which incent and provide capacity for central station power plant using current and new stocks of fossil fuels, will contribute significantly to the cumulative effects of global warming. The claim that the Cap-X expansion plan is “agnostic” about what kind of sources it carries to loads, has been used to represent and justify a new approach to addressing need for 'backbone' transmission infrastructure to expand transmission structure to address 'regional' as well as local load serving need. This is, in effect, a claim of 'agnosticism' about the most critical policy and public interest issue of our times.

In the Supreme Court Case of Commonwealth of Massachusetts, et al., v. United States Environmental Protection Agency, et al. (<http://www.planning.org/amicusbriefs/pdf/massachusettsvusepa.pdf>) the amicus brief in support of petitioners *of the U.S. Conference of Mayors, National Association of Counties, International Municipal Lawyers Association, American Planning Association, The city of Seattle, The City of Albuquerque, The City of Burlington, and the City and County of San Francisco* -- establishes, in detail, the effects of global warming on planning and governance duties of state and local units of government. The brief states that these effects are already upon us. The effects of the injuries of global warming, specifically CO2 emissions, are established and are themselves cumulative, due to the fact that CO2 has a residence on the atmosphere, of 50-200 years (p. 26).

'Agnosticism' as to what kind of fuel will be powering these lines, is incompatible with the preferences, goals and conditions of past and recent Minnesota state energy policy and with overwhelming environmental and public interest and concern about the effects of global warming. This is an unacceptable criteria for justification or consideration in the claims and conditions of the certificate of need. Commitment of planning, financial, and material resources to a central station infrastructure design may have irretrievable or irreversible effects.

The environmental report must not assume the utilities' 'agnosticism', in adopting the 'need claim' of the utilities. The utility must be held to the standard of 'showing' that its preferred design solution will result in an environmentally superior solution that will reduce the state's (customer) carbon footprint, reduce dependence on fossil fuels, and will not undermine the state's priority of meeting demand with 'Efficiency First'.

The environmental report must fully account for the potential environmental effects and the cumulative effects of a proposal to fill local and regional need service through investments in transmission infrastructure that sustains and *expands the central station design model and socio-economic models* that have brought us global warming. It must establish a business as usual scenario, and identify features of this infrastructure design proposal, and the alternatives, that would change the outcome.

The environmental report must also consider the *conditions of operation* of the line that will determine what kind of fuel is used in generation capacity carried by the lines. Xcel's analysis of the challenges of implementing the RES in light of MISO issues should provide baseline guidance as to how to address the first part of this question. Operational issues are more complex, that is how sources are balanced and chosen, and should be elaborated by way of information requests for the environmental report.

The environmental report should discuss the potential social, economic and environmental impacts for:

1. Transmission infrastructure design that may incent and increase use and dependence upon fossil fuels for electrical generation;
2. Transmission infrastructure design that allows for expansion of fossil fuel use, even while expanding in some percentage renewable energy capacity on the same lines. This must be analysed in detail for impacts on global warming.
3. Transmission infrastructure design that would undermine the effects of past, present and future efficiency initiatives.
4. Transmission infrastructure design that biases source access, and and may disadvantage local energy planning and project initiatives.

The environmental report should provide to the court, commission, parties and public, a set of infrastructure and energy service and efficiency design scenarios that will support effective and timely implementation of state energy policy priorities for:

- a) rural economic development,
- b) emissions reductions, and
- c) aggressive efficiency and RES initiatives.

Public expectation; establishment of public interest in local comprehensive plans and initiatives:

A number of Minnesota municipalities and institutions, have made commitments to carbon reduction and other global warming solutions. Many have integrated sustainable development into their comprehensive planning goals. These comprehensive planning goals are the result of the expectations, social and political pressures, and engagement of Minnesota citizens in the planning process. The problems created by overdependence (in MN, up to 75%) on central station fossil fuel generation and associated central station transmission infrastructure design is well understood in the public sector.

Legislation establishes public interest: The expectation is that legislative policy reflects a broad public consensus that reduction of CO₂, aggressive efficiency measures, renewable energy standards and goals, are public interest and environmental issues of primary importance. These expectations and established public interests must be applied directly to evaluation of the proposed project and project alternatives discussed in the application, party and public comments – in the environmental report. The economic and environmental effects of the central station infrastructure design model, insofar as it supports the continued and potentially expanded use of fossil fuels, is already well established. Harms to global climate stability multiply on a daily basis and are cumulative in effect.

Cap-X claims that the lines, singly or in combination, a) will not incent or afford opportunity for increasing fossil fuel capacity, b) are for the purpose of increasing renewable energy delivery capacity, or c) are necessary for the service of local loads,. These claims must be tested not only against evidence but evaluated in the environmental report. These claims are fundamental to the need claims for the lines and the effects of this commitment of resources on the environment and economy, relative to global warming realities.

To include:

The environmental report must a) list the public interest goals, mandates and requirements of state policy (in statute, including 2007) that apply, or have been claimed to apply; and b) summarize public and party comments to the scope. In addition, local (county, township and city) policies and initiatives pertaining to fossil fuels, global climate change, or sustainability, should be listed and considered as a factor in the environmental report.

Harms to process and participation:

The request for exemptions in this proceeding, under the justification that the expansion planning model is a 'new way' of doing things, has created challenges for all parties and Commission itself. This rationale has been used to drive process and information requirement changes to the certificate of need process that disadvantage public understanding, and timely and meaningful participation. The rules and laws were put in place to create accountability of need claims to Minnesota environmental laws, policy priorities, public participation requirements and the public interest – not for the convenience of utility applicants.

Ensuring adequate and equitable access to information is a prime purpose of regulation and an essential condition of meaningful public participation. Claims have been made by parties and public participants, that the exemptions granted by the public utilities commission have caused harm to the affected and interested members of the public -- in terms of access to information and ability to participate meaningfully and to affect the outcome of the decision. In addition, the burdens to process and participants of evaluating 3 lines in one proceeding, which have different need claims, potential ownership structures and alternatives -- are unreasonable.

The Court should make every effort to ensure that the burden for development of alternatives in this challenging scenario is proportionately borne, in accordance with resource capacities, first by the utilities, second by the public agencies, and only third by parties and interested members of the public. The state must play an active role in this analysis, starting with the environmental report.

I respectfully submit these comments, as a citizen, township planning commissioner.

Kristen Eide-Tollefson

HealingSystems@earthlink.net

P.O. Box 130

Frontenac, MN 55026

1-651-345-5488

612-331-1430



January 14, 2008

David Birkholz
Energy Planning Permitting
MN Department of Commerce
85 7th Place East, Suite 500
St. Paul, Minnesota
55101-2198

***East Central
Landscape Committee***

- Audubon Center of the North
- Benton County Planning & Zoning
- East Central Woodland Owners Council
- Hayland Woods Native Plant Nursery
- Isanti County Planning & Zoning
- Isanti County Parks
- Kanabec County Planning & Zoning
- Kanabec County SWCD
- Minnesota Department of Natural Resources
- Minnesota Forestry Association
- Minnesota Center for Environmental Advocacy
- Minnesota Deer Hunters Association
- Morrison County Planning & Zoning
- Petty & Sons Logging
- Private Landowners
- Pine County SWCD
- Pine County Land Department
- Sherburne County Parks
- Sierra Club
- St. Croix Coalition
- U.S. Fish & Wildlife Service
- Wright County Parks

***West Central
Landscape Committee***

- Farm Bureau
- Minnesota Agro Forestry Cooperative
- Minnesota Association of Consulting Foresters
- Minnesota Association of RC & Ds
- Minnesota Department of Natural Resources
- Minnesota Forestry Association
- Minnesota Deer Hunters Association
- Private Landowners
- Snowy Pines Forestry
- The Nature Conservancy
- Todd County SWCD
- Wadena County SWCD
- WesMin RC & D

Re: Comments - CapX2020 Project

Dear Mr. Birkholz:

On behalf of the East Central and West Central regional landscape committees, I would like to submit the following comments on the proposed CapX2020 project. The landscape committees are two of six regional committees supported by the Minnesota Forest Resources Council (MFRC), the state agency responsible for implementing the Minnesota Sustainable Forest Resources Act of 1995. The MFRC serves as the chief advisors to the Governor and Legislature on sustainable forestry matters in the state.

The two committees met on January 11, 2008, and discussed the project with respect to forest resources. One of the purposes that the MFRC and its regional landscape committees work within per Minnesota Statute 89A is to: "foster no net loss of forest land". Another purpose is to foster the productivity of the state's forest resources to provide a diversity of sustainable benefits at the site and landscape levels. As wooded areas are cleared and removed for construction activities and/or utility line corridors, the committees would encourage acre for acre replacement of forestlands or financial support efforts to replace lost forested areas, funded by the party responsible for deforestation. In addition, the committees recommend that vegetation cut during construction and maintenance for the electrical facilities be used for biomass energy or other sustainable uses.

For more information about the MFRC and the landscape program, please see the Council's website at www.frc.state.mn.us. I would be happy to discuss the comments from the committees at your convenience. You can reach me by calling (320) 256-8300. Thank you.

Sincerely,

Lindberg S. Ekola, AICP
Landscape Program Manager

c. East Central Landscape Committee
West Central Landscape Committee
Dave Zumeta, MFRC Executive Director

Mark Fjelstad
16538 Goodhue Avenue
Nerstrand, Minnesota 55053
January 10, 2008

David Birkholz
Minnesota Department of Commerce
Energy Facility Permitting
85 7th Place East, Suite 500
Saint Paul, MN 55101-2198

Mr. Birkholz:

I appreciate the opportunity to share my thoughts about one of the CapX 2020 proposed high voltage power line corridors. I own the Veblen Farmstead which is located about 1 mile east northeast of Nerstrand in Rice County. As you know one possible route proposed by the CapX 2020 group runs between Hampton and Kenyon, and my property is in the center of that north-south route.

The Veblen Farmstead is a National Historic Landmark and is on the National Register of Historical Places. I feel strongly that the State of Minnesota should protect our heritage and should avoid placing large new transmission lines near this site or any other such important sites. It is essential to remember that the Veblen Farmstead has great National and International significance. I think that the Farmstead should be considered in the Commerce Departments Environmental Report.

The proposed transmission corridor is also near the Big Woods State Park which is a couple miles West of Nerstrand. The State of Minnesota should make a strong effort to keep large power lines away from The Big Woods and all State Parks. Rice County has a Comprehensive Plan that pledges to protect natural areas including Big Woods State Park. I believe that the State of Minnesota has the responsibility to guard its Parks and take them into account in evaluating power line routes.

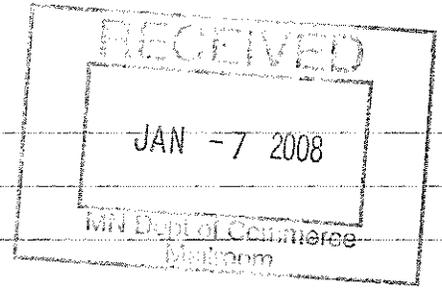
The proposed corridor also passes very close to the Nansen Agricultural Historic District which is also on the National Register of Historical Places. The District is near State Highway 56 a few miles from here in the Sogn Valley. Every effort must be made to avoid constructing large new transmission line systems near an important historic area like Nansen.

I feel strongly that if new electrical transmission capacity is absolutely necessary it should be routed through already existing power line corridors. There is no reason to create a new corridor along the Rice-Goodhue County boundary when already existing routes further east can be utilized. And as I have mentioned above, there are a number of significant natural and historic sites that should be protected, and areas that already have been disrupted could accommodate larger lines if they are needed.

I will be happy to provide more information if that might be helpful. Please feel free to call or write to me. I realize that power line routing is always controversial, but it seems good policy to continue to avoid creating new corridors especially if they would necessarily impact sensitive natural areas and historic sites.

Sincerely,

Mark Fjelstad
507-789-5156



DATE: 1-1-07
TO: DAVID BIRKHOLZ
FROM: KAREN GYNN
SUBJECT: TRANSMISSION LINE

MY FEELINGS ARE VERY MUCH AGAINST
TRANSMISSION LINES.

THERE MUST BE ANOTHER WAY TO
GET POWER. WIND, SUN, WATER LOCALLY.

LONG TERM HEALTH FACTORS ARE
AT RISK! THEY SAY NOT, BUT THEY ARE THERE.

WHY SO CLOSE TO POPULATED
AREAS. WHY NOT THRU MORE
WILD AREAS, IF THEY HAVE TO
HAVE LINES. WHICH THEY DON'T REALLY NEED.

Karen Gynn

KAREN GYNN

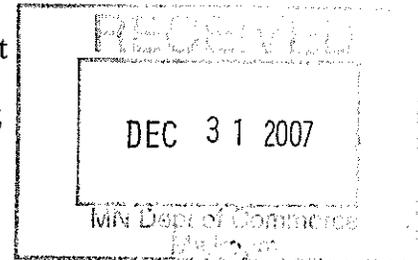
10209 RA RD #9

Eyota, MN

55934

(507) 288-7935

Christopher J. Gostout
182 Evergreen Dr NE
Rochester, Mn, 55906



Mr. David Birkholz
Energy Facility Permitting
Minnesota Department of Commerce
85 7th Place East, Suite 500
St. Paul, Mn., 55901

December 27, 2007

Dear Mr. Birkholz:

I am writing to respond to the request for input on human and environmental impacts on the proposed CapX2020 project and in specific the proposed narrowest corridor which extends across the north of Rochester in an East-West direction.

The above mentioned corridor passes through our community of 10 families. Across the Zumbro River are even more families which will be in close proximity to the proposed power lines. Our own community has young children in every family at or below the age of 10. I am concerned about long term health risk from exposure to the radiant level of electrical energy these lines will be carrying. Epidemiology studies have been performed in Europe on populations living in close proximity to power lines of similar strength. These have reported a statistically higher risk of cancer among these populations. Deflecting these lines further north or further south into more rural farm field will avoid close concentrations of people, especially children.

The proposed narrow east-west corridor in the north of Rochester also passes through the widest forested section of the Zumbro River which flows in a limestone valley. It does not make sense to target the widest forest coverage of the Zumbro River Valley when there is open farmland to the north and south of this narrow proposed corridor. From the environmental perspective, there are important issues which I believe strengthen this observation beyond the practical:

- The Zumbro River currently has problems with excessive silting. This has noticeably impacted Lake Zumbro for which there is a multimillion dollar proposal to remove the accumulated silt. Cutting a wide clearance through this forested section will in effect create a sluice for further silt washout into the river from the more tenuous forest floor on either side of the proposed right of way.
- The proposed narrow corridor will cut through forest containing mature white pine, which has been used by nesting eagles.
- It is well known that disrupting continuous forest with cuts as narrow as the length of an automobile will significantly alter the mix and numbers of bird species, reducing desirable small and unique populations of birds and replacing them with undesirable common varieties such as blackbirds and sparrows. This section of forested river valley has already been identified by the Minnesota

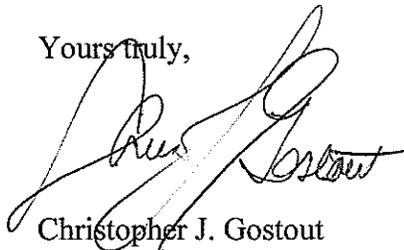
Audubon Society, as well as the Minnesota Land Trust, to contain unique and rare populations of birds.

- The margin of the forested section on the east side of the river contains natural prairie.
- The margin of the forested section on the west side of the river contains areas of protected flora identified by the DNR.

Our community has recognized the environmental value of this wide forested river valley years ago and set aside our owned portion of this land, approximately 350 acres, as a conservation easement within the Minnesota Land Trust. It actually represents one of the largest easements in the history of the Land Trust in Southern Minnesota. The proposed power line corridor will destroy a deliberate visionary community effort to protect at least a portion of this environment which will benefit Minnesota for years to come. We recognize that conservation easements are easy targets for power line right of ways, which is unfortunate. I believe, and my neighbors believe, that the above comments override any incentives to allow this potential north corridor to move forward in planning.

It has been brought to my attention that a power station has been proposed west of Rochester, in the Byron area. A power station in this location might more ideally manage alternative energy sources for power such as wind and alternative fuels. It may serve a stronger role satisfying future power needs for Rochester and at the same time obviate an appreciable amount of the entire power line right of ways and expenses being proposed in the CapX2020 planning. It would also free our wide forested corridor of the Zumbro River valley from environmental harm and eliminate our communities from long term adverse health sequelae. I request that attention is directed to the merits of this new power plant proposal.

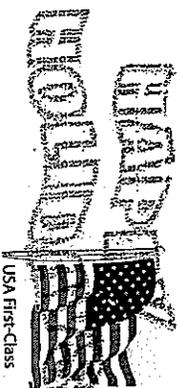
Yours truly,

A handwritten signature in black ink, appearing to read "Chris Gostout", written over a faint, larger version of the same signature.

Christopher J. Gostout

GORTOUT
142 EVERGREEN DR NE
ROCHESTER, MN 55906

ROCHESTER MN 559
28 DEC 2007 PM 2 T



Mr. David Birkholz
ENERGY FACILITY PERMITTING
MINNESOTA DEPARTMENT of COMMERCE
85 7th Place East, Suite 500
St. Paul, MN 55101

55101+2138



David Birkholz

From: Elmer Green [elgreen43@westtechwb.com]
Sent: Friday, December 21, 2007 8:26 AM
To: David.Birkholz@state.mn.us
Subject: CapX 2020

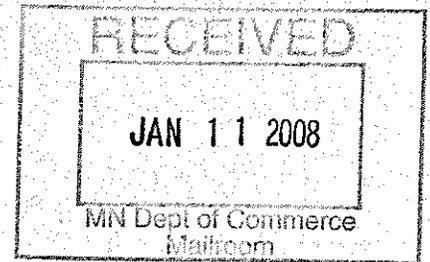
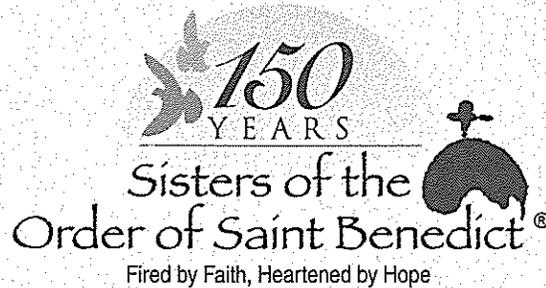
I do not question the need for the new power lines but question the proposed route of the Brookings, SD. to Marshall route.

I have lived in this area for 65 years(all my life except military years).

I'd recommend from Brookings follow US hwy. 14 thru Lake Benton which is the center and headquarters of the windpower to Mn. hwy.23 which runs to Marshall and Granite Falls. MN.; hwy.23 runs at a slant which shortens the miles of new line and it already has railroad right away; why not keep as many utilities as possible in one area?

Take a few minutes to look at a map!

Elmer Green



David Birkholz
Energy Planning Permitting
MN Department of Commerce
85 7th Place East, Suite 500
St. Paul, MN
55101-2198

January 10, 2008

Subject: CapX2020 - St. Cloud to Fargo Line - 06-1115

Dear Mr. Birkholz,

When the Sisters of the Order of Saint Benedict arrived in the St. Joseph area in 1863, they occupied part of a small agricultural village clustered around the log church that housed the Church of St. Joseph. Throughout our history in St. Joseph, the land has been increasingly integrated into a strengthened contemplative mission as well as conservation and recreational uses for the community.

The natural environment is integral to monastic life because it is necessary for contemplation and prayer, and to provide an environment for quiet and some separation from the outside world. For the Sisters of the Order of Saint Benedict, the mixed deciduous woodland at the southern edge of the convent and college property continues to be a focus of contemplation and religious observance.

Saint Benedict's Monastery owns land along Interstate 94 which may seem open and available. However, the Monastery and College of Saint Benedict provide housing for 300 sisters and 2000 students. The monastery buildings are listed on the national Register of Historic Places. Many people come to our campus for cultural and educational activities. We are concerned about the effect that a 345 kV transmission line with its 175 foot towers would have on the natural and cultural resources of our area.

We know that we too contribute to the need for power transmission. As such we also understand that we cannot trivialize or negate the need for transmission simply because we do not like the idea of tall towers in a natural landscape.

We recently attended a presentation by Darrin Lahr and his staff from CapX2020; Beth Sohlt from Wind-on-the-Wires; and George Crocker of NAWO. We learned a great deal from them but do not feel knowledgeable on the complexities of the Cap X2020 project nor are we able to offer you any concrete evidence for or against the need stated by the utilities. We trust that the Public Utilities Commission and the Department of Commerce will use their knowledge to act in the public's behalf.

The following are technical and policy issues we feel must be examined prior to any decision on this St. Cloud- Fargo section of the line.

How has the 2007 legislative requirement for 25% renewable energy changed the need?

- Has the analysis been done to see if CapX2020 would be different if had started after this 2007 mandate?

- The CPX2020 proposal was designed to meet a projected need for about 6,000 MW of additional electrical generation capacity during the forecast period. Those forecasts have since been abandoned due to changed circumstances. Considering that revised forecasts project a need for about half as much new generation capacity as the abandoned forecasts, why hasn't the CAPX 2020 Proposal been revised to reflect the new projections?

Is CapX2020 a continuation of an old-paradigm, in which a relatively few old-fashion central-station generators will get hooked up to remote loads with a relatively few extra-high voltage powerlines?

- We think that the PUC should at least look at a policy change that could guide our society toward much cheaper, quicker, less disruptive, and more new-paradigm infrastructure to optimize distributed and dispersed community-based energy development.
- If true that thousands of megawatts of new coal-fired capacity west of Minnesota are already in the Midwest Independent System Operator (MISO) Queue, and considering that existing Dakota coal capacity is already transmission-constrained, and considering the limited number of substations (which serve as "on-ramps" for energy from Minnesota-based generation capacity) along the line routes in Minnesota, what will prevent these powerlines from being used to transmit larger amounts of coal-fired electricity, and diminished amounts of C-BED electricity generated in Minnesota?
- What is the transmission infrastructure cost on a per megawatt basis, for each new megawatt of electrical generating capacity made possible by the CAPX 2020 Proposal?

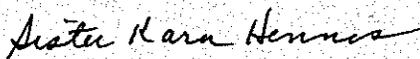
What are the alternatives to building this line?

- Considering the complexity and scale of the interconnected electrical utility system, it appears in some ways that the Applicant and the regulators are interested in considering only one, single solitary scenario for addressing multiple perceived inadequacies of the system. Why do no alternatives appear to be included in the CAPX2020 Application?
- Can dispersed generation using existing transformers at multiple locations solve the problem at a much lower cost?
- What are the system alternatives (supply-side and demand-side) to the CAPX 2020 Proposal?
- Will each proposed CAPX 2020 powerline be justified on its own merit, and not lumped together as a single package?

Saint Benedict's land lies south of Saint John's Abbey and University and the land of the Avon Hills Initiative. The sisters support the Avon Hills mission of maintaining open space and habitat in the nearly 50,000 acres of unique rolling, wooded landscape that surrounds this area.

In closing, we hope you will give careful analysis to the natural features of our landscape. But we also hope you will give careful thought to the underlying policy issues that are driving the CapX2020 issues. We want to be part of a solution that truly is forward-thinking and balances all the issues as well as possible. Please advise us if we can be of further assistance.

Respectfully,

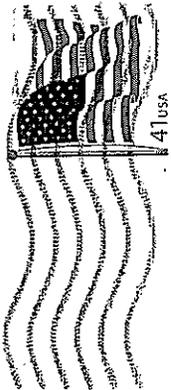


Sister Kara Hennes
Treasurer

Cc: Sister Nancy Bauer, Prioress

Sisters of the
Order of Saint Benedict®

104 Chapel Lane
St. Joseph, MN 56374-0220

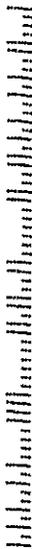


SAINT CLOUD MN 563

10 JAN 2008 PM 3 T

David Birkholz
Energy Planning Permitting
MN Department of Commerce
85 7th Place East, Suite 500
St. Paul, MN 55101-2198

55101+6013



David Birkholz

From: Ice, Richard [RICE@csbsju.edu]
Sent: Monday, January 14, 2008 9:53 AM
To: David.Birkholz@state.mn.us
Cc: Ice, Richard
Subject: RE: PUC# 06-1115 - St. Cloud-Fargo

To: David Birkholz
Energy Planning Permitting
MN Department of Commerce

From: Richard Ice
31539 County Road 50
Avon, MN 56310

RE: PUC# 06-1115 – St. Cloud-Fargo

I write to raise concerns and questions about the proposed power lines in the CAPX2020 Application. First, is the power line really necessary? I would like to see evidence that this line is necessary. Further, could the power needs of the St. Cloud area be better handled in other (less intrusive) ways?

Second, I would like to know what are the system alternatives (supply-side and demand-side) to the CAPX 2020 Proposal. The proposal information simply states the powerlines are needed, but has not explained clearly the alternatives to this proposal. I do not favor jumping to this proposal without adequately exploring or even knowing the alternatives.

Third, I oppose the use of these power lines because they will scar the landscape. The Avon and Collegeville areas have concentrations of residential areas that would be seriously harmed by this intrusive power line. Property values would be adversely affected by this proposal. Further, the natural area and bird life would be adversely affected as well.

I raise these questions and ask that your department provide us with more information and for the department to do additional study for this proposal. This proposal is using the traditional paradigm for delivering energy and one that should be challenged. I do not believe that the benefits outweigh the cost of this line. By cost I am referring to much more than the cost to the power companies – I am referring to the cost to the property owners, to the community for loss of natural beauty, and to the wildlife. The community is not being adequately compensated for those losses.

Sincerely,
Richard Ice

Scoping the ER Content

- Human and environmental impacts of the project due to size, type, and timing of the project, system configurations, and voltage
- Information on alternatives to the project
- Mitigating measures for possible adverse impacts

(See Minnesota Rule 7849.7030)



RECEIVED

DEC 14 2007

MIN Dept of Commerce
Mailroom

Using the above slide as a guideline, please share your ideas on issues for the Environmental Report. The report will be a part of the PUC Hearing on the CapX 2020 Project's Certificate of Need application.

(Use back of page for additional comments.)

Dear Sirs:

I have a "concern" About The Cap X 2020 Group 1 Transmission Project, I have a piece of Property which I have been "grooming" for the past 35 yrs in this piece of Property to be my Retirement Home and Recreation for my Remaining years. This site is between Hwy 24 and RR 44, About 1/2 mile off Hwy 94 (South of It) and 1 mile west of #24 in Lunden Township - Plum Creek Run.

Thru my Property, to the South of my Place is Dallas Lake, to the North is a County

Additional Comments:

Park, and warmer lake this area is very Minnesota like with lots of trees and lakes, streams, I love the area.

It is my hope that the line will not cross down 200 st west in Leander Township I think that coming into Clearwater from the north that the line may work better as it follows # 75 to Monticello, Mn. Please keep me informed as you get closer to the route that this line will be constructed on.

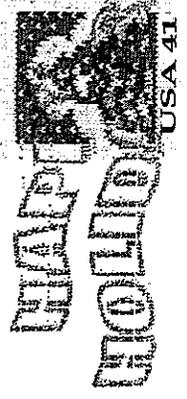
Complete and turn in today or mail by January 14, 2008 to:

David Birkholz
Minnesota Department of Commerce
Energy Facility Permitting
85 7th Place East, Suite 500
Saint Paul, MN 55101-2198

Sincerely,
Donie Job
- 511 Park St
Anoka, Mn,
55305
763-422-9198

Louie Sab
511 Park st
Anoka, MN
55303

MINNEAPOLIS MN 554
13 DEC 2007 PM 7 T



David Birkholz
Mn. Dept of Commerce
Energy Facility Permitting
85 7th Place East Suite 500
St Paul, MN 55101-2132

Date: December 12, 2007
To: David Birkholz
From: Stacy Kotch
Utility Transmission Route Coordinator
Office of Technical Support
Mailstop 678
395 John Ireland Blvd
St. Paul, MN 55155
stacy.kotch@dot.state.mn.us

Subject: CapX2020

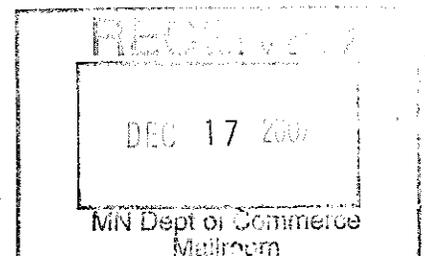
David,

As discussed, attached you will find Mn/DOTS's initial District responses to Xcel Energy's CapX2020.

Feel free to contact the District Reps or myself if you have any questions or information we should be aware of regarding this project.

Thank you,

Stacy Kotch
Utility Transmission Route Coordinator
Mn/DOT, Office of Technical Support
395 John Ireland Blvd., Mailstop 678
St. Paul, MN 55155-1899
Phone (651) 366-4635
Fax (651) 366-4769
stacy.kotch@dot.state.mn.us





Minnesota Department of Transportation

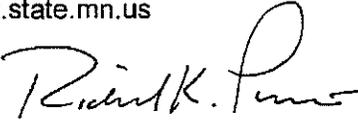
Memo

District 7 – Mankato and Windom
501 South Victory Drive
Mankato, MN 56001-5302

Office Tel: (507) 304-6100
Fax: (507) 304-6119

DATE: 10/18/2007

TO: Stacy Kotch
Utility Transmission Route Coordinator
Office of Technical Support
Mailstop 678
395 John Ireland Blvd.
St. Paul, MN 55155
stacy.kotch@dot.state.mn.us

FROM: R. Kent Purrier 
Senior Engineer
District 7 Mankato
501 S. Victory Drive
Mankato, MN 56001
richard.purrier@dot.state.mn.us

SUBJECT: Response to 9/4/07 CapX 2020 Update

Hello Stacy. District 7 has reviewed your recent update regarding the upcoming transmission projects associated with Xcel Energy's CapX 2020. We have a few initial comments regarding the location of the proposed facilities, and you will find these comments attached to this memo in the form of the project review routing sheet. If you have any questions, please contact me at 507/304-6151.

Thank you for the opportunity to comment.

Attch: District 7 "External Project" Review Routing Sheet

Cc: D7 Principals Group
Steve Schoeb
Mark Scheidel
Craig Felber

DISTRICT 7 "EXTERNAL PROJECT" REVIEW

Returned to K. Purrier
9-27-07 UTILITY
CORRIDOR
(PLANNING)

_____ PLAT _____ PERMIT _____ SITE PLANS (Zoning) _____ EAW OTHER (PLANNING)
 CONTROL SECTION OR SP VAR. T.H. 19 CORRIDOR
 LOCATION BROOKINGS, S.D. TO S.E. TWIN CITIES (T.H. 19 CORRIDOR IN DISTRICT 7)
 APPLICANT XCEL ENERGY CAPX 2020
 DATE 9/17/07 TARGET DATE 9/17/07 JOB NUMBER _____ ACTIVITY _____
 REQUESTER KENT PURRIER (when review complete - administration will return to requester)

Return to Administration between Review by each Section.

SECTION	ROUTE TO	COMMENTS	INITIAL & DATE
DESIGN	1 <i>Bob</i>	DOCUMENTS	<i>Bob</i> 9-18-07
	2 <i>Robin</i>	GEOMETRICS	
	3	HYDRAULICS <i>I'm assuming the poles will reside @ R/W line, not reflecting drainage.</i>	<i>Chris</i> 9/17/07
	4 <i>Robin</i>	PLANS <i>No comments</i>	9/19/07 Return to Admin
AGREEMENTS			Return to Admin.
LAND MANAGEMENT	MARC	RIGHT OF WAY	<i>9/18/07</i> Return to Admin.
		SURVEYS	Return to Admin.
MATERIALS			Return to Admin.
PERMITS	<i>Steve</i> <i>JIM F.</i>	<i>No sub stations on R/W. If poles on R/W permit needed</i>	<i>9-20-07</i> Return to Admin.
PLANNING	MARK	<i>No Comment</i>	<i>Mark</i> 9-20-07 Return to Admin.
TRAFFIC	MARC		<i>9/20/07</i> Return to Admin.
MOE - OPERATIONS			Return to Admin.
ADE - PROJECT DELIVERY	GREG	<i>WHO will be following the progress of this project? I would like updates and someone to attend the informational mtg. Kent have you been assigned to the project? SWANSON will also need to have a briefing on this project. GSD.</i>	9-26-07 Return to Admin.
DISTRICT ENGINEER			Return to Admin.

PLEASE REVIEW THE AVAILABLE INFORMATION AND PROVIDE ANY INITIAL CONCERNS YOU MAY HAVE AT THIS TIME. RP



Memo

DISTRICT 8
2505 Transportation Road
Willmar, MN 56201

Office Tel: 320-214-3773
Fax: 320-231-5168

September 25, 2007

To: Stacy Kotch – MS 678
Utility Transmission Route Coordinator

From: Jarrett Hubbard
Senior Transportation Planner
District 8 - Willmar

Subject: CapX 2020: Brookings, SD – Southeast Twin Cities

The District 8 Site Development Review Committee appreciates the Office of Technical Support's update on the Capx 2020 Brookings, South Dakota to the Southeast Twin Cities project for the proposed construction of a 345 kV transmission line. At this time, District 8 offers the following comments:

- District 8 has no specific concerns related to the proposed project corridor as it follows State Highway 19. The District intends to provide further detail when a more definitive route is chosen.
- There are currently plans to upgrade and improve several sections of State Highway 23 especially in the Marshall area. Project officials should contact Mn/DOT District staff, as well as, the City of Marshall and Lyon County officials concerning the details, location and timing of these projects. The same is true of the area surrounding the Marshall airport.

The District Site Development Committee appreciates the opportunity to comment on the proposed transmission line and anticipates further comments as the project and actual site specific information becomes available.

Thank you for your assistance in monitoring this project.



Minnesota Department of Transportation

Memo

Detroit Lakes District
1000 Highway 10 West
Detroit Lakes, MN 56501

Office Tel: 218/846-3600
Fax: 218/846-7979

DATE : October 11, 2007

TO : Stacy Kotch, Utility Transmission Route Coordinator

FROM : Steven Maack, District 4 PUC Contact 

SUBJECT: CapX 2020 Project Comments

District 4 has the following comments on the CapX 2020 Project. Since a route has not been determined comments are very general.

- Any work adjacent to the Interstate 94 corridor will need District coordination and involvement. It is important to work together and have clear understanding what the utility company proposes. We would like to be very involved with the utility company in their design stages to properly have this transmission line installed.
- If this project requires work to be completed on MnDOT right of way. A long permit 2525 is required for utility crossing or parallel route on Trunk Highways. This permit should be submitted to St. Paul Central Office. Allow 6 weeks for processing.
- MnDOT Permits web site <http://www.dot.state.mn.us/utility/forms/index.html> If there are questions for the District please contact Steve Maack, MnDOT Permits at 218-846-7949 for information.

GWcc: Mark Waisanen, Program Development Manager
Jody Martinson, District Planner
District 4 Permits
File

**Minnesota Department of Transportation****Memo**

Minnesota Department of Transportation - District 6
2900 48th Street N.W.
Rochester, MN 55901-5848

Office Tel: 507-280-3188
Fax: 507-285-7279
E-mail: chris.moates@dot.state.mn.us

Date: October 25, 2007

To: Stacy Kotch, Utility Transmission Route Coordinator, MS 678

From: Chris Moates, Planning Director, District 6

Chris Moates

Subject: CapX 2020 Update

I have reviewed the Certificate of Need and associated material supplied for the CapX Southeast: Twin Cities-Rochester-La Crosse 345 kV transmission line and the CapX West: Brookings, SD – Southeast Twin Cities 345 kV transmission line. As the information supplied was for a Certificate of Need, there are no specific concerns at this time. It is quite apparent from the material presented that there will be impacts concerning Mn/DOT District 6 in the form of proposed routing of these transmission lines across the interstate highways and other state highways, and work and possible placement of structures adjacent to and within Mn/DOT right of way. More specific comment will be supplied in the later stages as proposed routes become more clearly defined.

Please note that Mn/DOT's accommodation policy, which is listed online at <http://www.dot.state.mn.us/utility/files/pdf/appendix-b.pdf>, will help in linking the District's permitting process with the transmission line projects by providing the common ground by which both Mn/DOT and Xcel will operate. In relation to the interstate concerns, Mn/DOT does not allow longitudinal utilities within freeway right of way. In addition, US 52 from the north end of Rochester to I-90 should be considered freeway at this time and it should be noted the long range vision is to achieve freeway status for US 52 between I-90 and the Twin Cities.

I had conversations with Pamela Jo Rasmussen, Siting and Permitting Supervisor for Xcel Energy, and several consultants at the Northfield open house on September 26, 2007. I was pleased with the amount of information available at the open house, the number of consultants available to answer questions, and the acknowledgment that there will be additional discussions of Mn/DOT's concerns in the future as the proposals advance through the environmental reporting and EIS stages.

cc: Nelrae Succio, Greg Paulson, Mark Trogstad-Isaacson, Peter Waskiw,
Tom Streiff, Terry Condon, File
DOCS-#579474

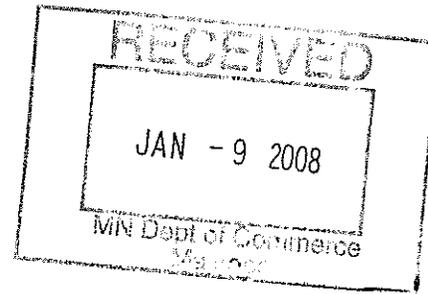
Transp...
395 John Ireland Boulevard
Saint Paul, MN 55155-1899

MS 6-18

David Birkholz
Minnesota Department of
Commerce
85 7th Place E., Suite 500, St. Paul, MN
55101-2198

02 1M
0004217102
MAILED FROM ZIP CODE 55155
500970
DEC 14 2007
PRIME/POST

Craig Kraft
717 Home Street
Kenyon, MN 55946
January 4, 2008



David Birkholz
Energy Facility Permitting
Minnesota Department of Commerce
85 7th Place East,
Suite 500
St. Paul MN 55101

Dear David Birkholz:

I am a long-time resident of Kenyon, 18 years, and I am writing to express my concern about recent discussion and the pending decision to run a corridor for electric lines through Kenyon.

I understand the need to upgrade power lines so that power is available when needed. But I am at a loss to understand why you would route these major transmission lines through a small town with no major industry. The cost of running this through residential property and the human impact does not make sense. I would assume that a smaller spur or feeder line could be brought into town if needed.

The other thing that troubles me is that no one can tell me what is being discussed, either at city hall or the utility company. I assume that you will not receive many letters on this because no one knows what the impact would be. Will the residents of Kenyon be able to see these plans before a decision is made? Will the affected land owners and adjacent land owners (in and outside of Kenyon) be informed by letter before a decision is made? I read of this in the local paper, only after my wife pointed this out. I don't know how many people even know of this.

I am looking forward to your response.

Sincerely,

Craig Kraft

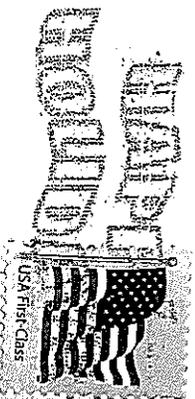


Craig Kraft
717 Home St.
Kenyon, MN 55946-1307

David Birkholz

Energy Facility Permitting
Minnesota Department of Commerce
85 7th Place East
Suite 500
St. Paul, MN 55101

ROCHESTER MN 559
08 JAN 2008 PM 2 1



25101+2154



Avon Hills Initiative

Box 377, Avon, MN 56310

January 11, 2008

Mr. David Birkholz
Energy Planning Permitting
MN Department of Commerce
85 7th Place East, Suite 500
St. Paul, MN 55101-2198

Subject: CapX2020 - St. Cloud to Fargo Line – 06-1115

Dear Sir,

The Avon Hills Initiative

The Avon Hills Initiative (AHI) is a community based organization located in Central Minnesota committed to preserving the rural and natural character of roughly 50,000 acres in Avon, Saint Joseph, Collegeville, and Saint Wendel Townships. We work through education, community organization, and local government to increase awareness of land development pressures facing the Avon Hills. We act to initiate meaningful dialogue between stakeholders relative to these pressures, in order to preserve the rich cultural history, natural beauty, and biological diversity of the Avon Hills for generations to come. We have 300 families on our mailing list.

Our mission is to:

- Preserve the rural character of our communities
- Protect the quality of our natural areas
- Maintain economic productivity in our communities while respecting landowner rights

We are concerned about the effect that a 345 kV transmission line with its 175 foot towers would have on the natural and cultural resources of our area. We are also aware that each of us contributes to the need for power transmission. As such, we understand that we cannot

trivialize the need for transmission simply because we do not like the idea of tall towers in our natural landscape.

Natural Resources in the Avon Hills

In 2004, The Avon Hills Initiative cooperated with others to complete a fairly detailed survey of the natural resources of our area. Please see the attached colored map which shows the dense collection of natural resources in such a small area. Public participation was broad and strong in this mapping exercise. The wooded hills, wetlands, and lakes of this area are a key component of the remaining natural vegetation of Stearns County. It is imperative that we do all we can to avoid cutting a 150 foot transmission line right-of-way through this unique natural habitat.

As indentified by the MN County Biological Survey, a significant proportion of the remaining natural vegetation and rare plants and animals of the entire county lie within this relatively small geographic area. The lakes are often deep and especially clean for this area of Minnesota. Four Scenic and Natural Areas (SNAs) have been established by the MN DNR in this area, some just recently.

The Stearns County Planning Commission has recommended that the County adopt a special Conservation Overlay District for the Avon Hills area as part of the new Stearns County comprehensive plan. The vote to pass this novel overlay district is Jan 22. We expect the passage followed by special ordinances to promote the preservation of open-space.

The Legislative Citizen Commission on MN Resources (LCCMR) just awarded \$337,000 to protect the landscape of the Avon Hills. Most of the funding goes for conservation easements of this sensitive landscape.

Last year, the Audubon Society named the Avon Hills area as its latest “Important Bird Area” in Minnesota. The remaining natural habitats are very important in what is otherwise a largely human-dominated and disturbed landscape. The Nature Conservancy also completed a conservation action plan for the Avon Hills in 2007. This plan carefully evaluated the resources and threats to the landscape and the analysis resulted in the Avon Hills being named a focus area for resource protection by The Nature Conservancy in MN.

Public Policy on Electric Transmission Lines and Generation

The citizens of our communities don't possess the technical knowledge to evaluate the actual need for this 345 kV line. To improve our knowledge, our organization co-sponsored a public meeting on this topic this week at Saint John's. Speakers included Darrin Lahr and his staff from CapX2020; Beth Soholt from Wind-on-the-Wires; and George Crocker of NAWO.

We trust that the Public Utilities Commission (PUC) and the Department of Commerce will use their knowledge to act in the public's best interest. While we cannot offer specific evidence concerning the need stated by the utilities we think the following technical and policy issues must be examined by the PUC prior to any decision on this St. Cloud-Fargo section of the line.

Is CapX2020 a continuation of an old-paradigm, in which relatively few old-fashion central-station generators will get hooked up to remote loads (cities) with relatively few extra-high voltage power lines?

- We think that the PUC should at least look at a policy change that could guide our society towards a cheaper, quicker, less disruptive, and newer paradigm infrastructure to optimize distributed and dispersed community-based energy development.
- If true that thousands of megawatts of new coal-fired capacity west of Minnesota are already in the Midwest Independent System Operator (MISO) Queue, considering that existing Dakota coal capacity is already transmission-constrained, and considering the limited number of substations (which serve as "on-ramps" for energy from Minnesota-based generation capacity) along the line routes in Minnesota, what will prevent these power lines from being used to transmit larger amounts of coal-fired electricity, and diminished amounts of C-BED electricity generated in Minnesota?
- What is the transmission infrastructure cost on a per megawatt basis for each new megawatt of electrical generating capacity made possible by the CapX2020 proposal?

How has the 2007 legislative requirement for 25% renewable energy changed the need? Has the analysis been done to see if CapX2020 would be different if it had started after this 2007 mandate?

- The CapX2020 proposal was designed to meet a projected need for about 6,000 MW of additional electrical generation capacity during the forecast period. Those forecasts have since changed due to changed circumstances. Considering that revised forecasts project a need for about half as much new generation capacity as the abandoned forecasts, why hasn't the CapX2020 proposal been revised to reflect the new projections?

What are the alternatives to building this line?

- Considering the complexity and scale of the interconnected electrical utility system, it appears in some ways that the applicant and the regulators are interested in considering only one scenario for addressing multiple perceived inadequacies of the system. Why do no alternatives appear to be included in the CapX2020 application?
- Can dispersed generation using existing transformers at multiple locations solve the problem at a much lower cost?

- What are the system alternatives (supply-side and demand-side) to the CapX2020 proposal?
- Will each proposed CapX2020 power line be justified on its own merit, and not lumped together as a single package?

In closing, we trust you will use this process to give careful thought to the protection of the natural features of our landscape. We also hope you will ask experts to provide the PUC with multiple perspectives on the underlying policies that are driving CapX2020. We want to be part of a solution that is as forward-thinking and light-on-the-land as possible. Please advise us if we can be of further assistance.

Respectfully,

Peter Dwyer
Chair

Enclosures

Avon Hills Conservation Vision Color Map
Avon Hills boundary map
Avon Hills located on CapX2020 map

Cc: Avon Hills Initiative Executive Committee
Darrin Lahr – CapX2020
Beth Soholt – Wind-on-the Wires
George Crocker - NAWO