

## **OES EFP Staff Guidance Statement to the AFT**

The Hiawatha HVTL project is a routing docket. In a routing docket the PUC's decision points are: (1) adequacy of the EIS, (2) should a route permit be granted and (3) if so, the selection of a route and a determination of permit conditions. Basically, granting a HVTL route permit or NOT.

The PUC will not be selecting an alternative means of meeting the selected need.

In a Routing proceeding, the OES conducts environmental review and produces a document termed an Environmental Impact Statement. The EIS evaluates the proposed project's potential environmental impacts and possible mitigative measures. It also evaluates the potential environmental impacts and possible mitigative measures for alternative routes (and/or route segments) that meet the stated need. This evaluation includes specific descriptions of the environmental impacts associated with the preferred and selected (i.e., scoping decision) alternative routes.

The Hiawatha HVTL project is below the threshold (10 miles) for needing a determination of need; therefore there is no statutory requirement for a CON docket.

In a CON docket the PUC's decision point is, is the requested power/capacity/support needed and is the proposed facility the best means of meeting the stated need considering economic and environmental factors.

In a CON proceeding, the OES conducts environmental review and produces a document termed an Environmental Report. The ER evaluates the proposed project's potential environmental impacts and possible mitigative measures. It also evaluates the potential environmental impacts and possible mitigative measures for alternative "types" of facilities that may meet the stated need. This evaluation includes generic descriptions of the environmental impacts typically associated with the various types of alternatives (i.e., hydro, solar, fossil-fuel, etc.) as well as, an evaluation of specific hypothetical scenarios (i.e., a 164 MW Nat'l gas CT alternative to a proposed 164 MW uprate at an existing nuclear facility).

For the Hiawatha HVTL project, the EIS will contain a review and limited discussion of the need for the project and potential alternative means or "types" (i.e., DSM/conservation, DG, Transmission/distribution upgrades, etc.) of facilities to meet the stated need so as to place the proposed project into context. However, the EIS will not contain an analysis of specific alternative proposals (i.e., a XX MW solar array placed at the load or a XX MW CHP facility in a local commercial/industrial establishment). If members of the public or LUGs feel that the proposed project, even with mitigative measures, has unacceptable environmental impacts or is not compatible with local land use plans their position (relative to the PUC's final decision) would be a denial of the HVTL Route Permit. They would best be served by:

1. Making sure that the EIS (via the scoping process) Scoping Decision contains a complete inventory of the potential environmental impacts;
2. Making sure that the EIS contains accurate data on local land use plans;
3. Participate in the DEIS review and public comment period to ensure that their impacts have been included;
4. Participate in the contested case hearing and voicing their opinion;
5. Participate in the PUC's final decision meeting/hearing.