



**BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

**COMMENTS AND RECOMMENDATIONS OF THE  
MINNESOTA OFFICE OF ENERGY SECURITY  
ENERGY FACILITY PERMITTING STAFF**

**DOCKET NO. ET2/TL-10-86**

Meeting Date: March 25, 2010 ..... Agenda Item # 2

Company: Great River Energy

Docket No: **ET2/TL-10-86**

**In the Matter of the Route Permit Application for the Potato Lake 115 kV  
Transmission Line and Substation in Park Rapids, Minnesota.**

Issue(s): Should the Minnesota Public Utilities Commission accept the application as complete?

EFP Staff: Scott E. Ek

**RELEVANT DOCUMENTS**

Notice of Intent Letter.....January 28, 2010  
Route Permit Application .....February 26, 2010

The enclosed materials are work papers of the Office of Energy Security (OES) Energy Facility Permitting (EFP) staff. They are intended for use by the Minnesota Public Utilities Commission (Commission) and are based on information already in the record unless otherwise noted.

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## DOCUMENTS ATTACHED

- Figure 1 – Proposed Project
- Draft Potato Lake 115 kV Project Decision, Structure and Charge
- Letters Requesting an Advisory Task Force (6 letters)

*Note:* Relevant documents and additional information can be found on eDockets (Docket 10-86) or the PUC's Energy Facilities Siting and Routing website at:  
<http://energyfacilities.puc.state.mn.us/Docket.html?Id=26124>.

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## STATEMENT OF THE ISSUES

Should the Minnesota Public Utilities Commission accept the application as complete? If accepted, should the Minnesota Public Utilities Commission authorize the Office of Energy Security to appoint a public advisor and an advisory task force?

## INTRODUCTION

Great River Energy (GRE) is a not-for-profit generation and transmission cooperative based in Maple Grove, Minnesota. GRE provides electrical energy and related services to 28 member cooperatives, including Itasca-Mantrap Cooperative Electrical Association (Itasca-Mantrap), the distribution cooperative serving the area to be supplied by this proposed transmission line project.

On February 26, 2010, GRE filed a route permit application under the alternative permitting process for 7.25 miles of 115 KV transmission line and a newly proposed substation. Great River Energy would be named as permittee for the proposed project and would own the approximately 7.25 miles of 115 kV overhead transmission line. Itasca-Mantrap would own the proposed Potato Lake Substation, and has purchased 3.2 acres of land on which to construct the new facility. In addition, Itasca-Mantrap would own and operate all the associated low-voltage distribution facilities.

GRE indicates in the route permit application that the existing 34.5 kV Itasca-Mantrap distribution system serving the area has reached its capacity limit based on continuous growth of electric demand averaging six percent per year for the past seven years. GRE has determined that the existing 34.5 kV system serving the area will eventually be unable to support the area electric load, and a higher voltage will be required to provide adequate system support, thus the reason for proposing the Potato Lake 115 kV transmission project.

## PROJECT DESCRIPTION

The proposed 115 kV Potato Lake transmission project would be located north of the city of Park Rapids in Hubbard County, Minnesota. The project would specifically be located in sections of Arago, Lake Emma, Todd, and Henrietta townships (see Figure 1).

The project as described in GRE's route permit application would consist of the following:

- Construction of a new 115 kV Potato Lake Substation that would initially be operated at 34.5 kV until conversion to 115 kV is necessary.

- Construction of approximately 7.25 miles of new overhead 115 kV transmission line between the new Potato Lake Substation in section 21 of Arago Township and a tap point on GRE's existing Mantrap Sub Tap 34.5 kV line ("PM Line") in Lake Emma Township. The newly proposed transmission line would initially be operated at 34.5 kV until the surrounding transmission system is converted to 115 kV.
- Approximately 2.25 miles of existing 12.5 kV distribution line owned by Itasca-Mantrap would be removed, upgraded and attached/underbuilt to the proposed 115 kV structures along U.S. Highway 71 between the new Potato Lake Substation and 230<sup>th</sup> Street/Northern Pine Road.
- Installation/underbuild of new 12.5 kV distribution lines on the proposed 115 kV structures along 230<sup>th</sup> Street/Northern Pine Road and 141<sup>st</sup> Avenue up to the intersection with County Highway 18.

GRE has identified a proposed and an alternate route in their application. The proposed 115 kV transmission line route would exit the new Potato Lake Substation and proceed south paralleling U.S. Highway 71 for approximately 1.5 miles to 230<sup>th</sup> Street/Northern Pine Road, east along 230<sup>th</sup> Street/Northern Pine Road for approximately 1.5 miles to 141<sup>st</sup> Avenue, south approximately 1 mile along 141<sup>st</sup> Avenue to County Highway 18, then east paralleling County Highway 18 for approximately 3.25 miles to County Highway 4 and the proposed 3-way switch on the existing PM Line (see Figure 1).

The alternate route identified in the application would exit the new Potato Lake Substation proceed south paralleling U.S. Highway 71 for approximately 1.5 miles to 230<sup>th</sup> Street/Northern Pine Road, east along 230<sup>th</sup> Street/Northern Pine Road for approximately 2 miles, south approximately 1 mile following the boundary between sections 35 and 36 (Arago Township) to County Highway 18, then east paralleling County Highway 18 for approximately 2.75 miles to County Highway 4 and the proposed 3-way switch on the existing PM Line (see Figure 1).

GRE is requesting a 300 foot route width that extends 150 feet on either side of the road centerlines (or section lines) for the entirety of the route(s).

## **REGULATORY PROCESS AND PROCEDURES**

In Minnesota, no person may construct a high-voltage transmission line without a route permit from the Commission (Minnesota Statute 216E.03, subdivision 2). A high-voltage transmission line is defined as a conductor of electric energy designed for and capable of operation at a voltage of 100 kV or more and is greater than 1,500 feet in length (Minnesota Statute 216E.01, subdivision 4). The project as proposed would consist of approximately 7.25 miles of new 115 kV transmission line and would therefore require a route permit from the Commission.

Because the proposed project transmission line capacity is under 200 kV, less than ten miles in length, and does not cross a state border, a certificate of need is not required (Minnesota Statute 216B.2421, subdivision 2).

### **Route Permit Application and Acceptance**

In accordance with Minnesota Rule 7850.2800, subpart 2, applicants are required to provide a 10-day advance notice of intent to the Commission before submitting a route permit application. On January 28, 2010, GRE filed a letter with the Commission indicating their intent to submit a route permit application for the project under the alternative permitting process.

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On February 26, 2010, GRE filed a route permit application under the alternative permitting process for a new 7.25-mile 115 KV transmission line and substation. The project is eligible for consideration under the alternative permitting process as the transmission line voltage would be between 100 and 200 kilovolts (Minnesota Rules 7850.2800, subpart 2B).

Route permit applications for high-voltage transmission lines reviewed under the alternative permitting process must provide specific information about the proposed project including, but not limited to, applicant information, route description, environmental impacts and mitigation measures as defined in Minnesota Rule 7850.3100. Review under the alternative permitting process does not require the applicant to propose any alternative sites or routes in the permit application. However, if the applicant has rejected alternative sites or routes they must include the rejected routes and reasons for rejecting them in the route permit application (Minnesota Rule 7850.3100).

The Commission may accept an application as complete, reject an application and require additional information to be submitted, or accept an application as complete upon filing of supplemental information. The environmental review process begins on the date the Commission determines that a route permit application is complete (Minnesota Rule 7850.3200) and the Commission has six months to reach a final route permit decision from the date an application is accepted (Minnesota Rule 7850.3900).

### **Public Advisor**

Upon acceptance of an application for a route permit, the Commission must designate a staff person to act as the public advisor on the project (Minnesota Rule 7850.3400). The public advisor is someone who is available to answer questions from the public about the permitting process. In this role, the public advisor may not act as an advocate on behalf of any person. The Commission can authorize the OES to name a member from the EFP staff as the public advisor or assign a Commission staff member.

### **Advisory Task Force**

The Commission has the authority to appoint an advisory task force (ATF) pursuant to Minnesota Statute 216E.08, subd. 1 and Minnesota Rule 7850.3600. An ATF may include interested local persons, but requires at least one representative from each of the following local governmental units: regional development commissions, counties and municipal corporations, and one town board member from each county in which a route is proposed to be located (Minnesota Statute 216E.08, subd. 1). An ATF can be charged with identifying additional routes or specific impacts that could be included in the scoping decision document and evaluated in the environmental assessment. The ATF terminates upon completion of its charge, upon designation by the director of the OES of alternative sites or routes to be included in the environmental assessment, or upon the specific date identified by the Commission in the charge, whichever occurs first.

The Commission is not required to assign an ATF for every project. If the Commission does not name an ATF, the rules allow members of the public to request appointment of an ATF (Minnesota Rule 7850.3600). The Commission would then need to determine if an ATF should be appointed or not.

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## **Environmental Review**

An application for a high-voltage transmission line route permit is subject to environmental review conducted by EFP staff. The staff will provide notice and conduct a public information and environmental assessment scoping meeting to solicit public comments on the scope of the environmental assessment. The director of the OES may include a suggested alternative site or route in the scope of the environmental assessment only if the director determines that evaluation of the proposed site or route will assist in the Commission's ultimate decision on the route permit. Any person may also suggest specific human or environmental impacts that should be included in the environmental assessment. The environmental assessment will be completed and made available prior to the public hearing (Minnesota Rule 7850.3700).

## **Public Hearing**

Applications for high-voltage transmission line route permits under the alternative permitting process require a public hearing upon completion of the environmental assessment. The hearing is held in the area where the proposed project would be located and is conducted in accordance with Minnesota Rule 7850.3800.

## **STAFF ANALYSIS AND COMMENTS**

The EFP staff conducted a completeness review of the route permit application. Staff concludes that GRE has met the procedural requirement of Minnesota Rule 7850.2800, subp. 2, by providing the Commission written notice of its intent to submit a route permit application under the alternative permitting process at least 10 days prior to submitting the application. Staff also concludes that the proposed project is eligible for the alternative permitting process and that the application meets the content requirements of Minnesota Rule 7850.3100. The Commission's acceptance of the application will allow EFP staff to commence and conduct the public participation and environmental review processes. The applicant has indicated that any additional information deemed necessary for processing the application can and will be provided in a prompt manner.

### **Advisory Task Force**

In analyzing the merits of establishing an ATF for the project, staff considered four characteristics: project size, complexity, known or anticipated controversy, and sensitive resources.

#### Project Size

At approximately 7.25 miles, the project is relatively short. The requested route width for the entirety of the project is 150 feet on each side of the route centerline (300 foot total route width) with a 100 foot required right-of-way.

#### Complexity

The proposed route is simple and straight forward. Approximately 31 percent of the route would be constructed along an existing 12.5 kV distribution alignment that will be removed and co-located on the proposed 115 kV structures. The remaining 69 percent of the route would parallel existing road rights-of-way.

#### Known or Anticipated Controversy

The route permit indicates that GRE attended township board meetings in the proposed project area to describe the project to township board members.

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It is GRE's understanding that all township boards recognize the need for additional electric capacity in the area. GRE also held its own public information meeting on October 22, 2009. GRE has provided documentation of the comments it received from government agency consultation in Appendix A.

There appears to be some early public interest and concern for this proposed project, as indicated by 16 comment letters already efiled on the eDockets website. This includes six letters submitted to the Commission requesting that an ATF be established for the proposed project.

### Sensitive Resources

At this early stage of the process, EFP staff has not identified any sensitive resources that would be potentially impacted by the proposed project. Nor does staff believe the project would require any irreversible or irretrievable commitment of resources at this time.

As a result of the letters requesting appointment of an ATF and the early interest shown by a number of potentially affected landowners within the proposed project area EFP staff believes that an ATF would be appropriate in this case. Although the proposed project is relatively short and straightforward, an ATF may further assist local governmental units and landowners in understanding the siting and routing process and also ensure that conflicts with, or issues relative to regional and local planning are identified for consideration.

As stated above, the Commission has the authority to appoint an ATF pursuant to Minnesota Rule 7850.3600. An ATF may include interested local persons, but requires at least one representative from each of the following local governmental units: regional development commissions, counties and municipal corporations, and one town board member from each county in which a route is proposed to be located.

EFP staff has developed a suggested structure and charge for an ATF (attached) to assist in the scoping of the environmental assessment for the proposed Potato Lake 115 kV transmission line project.

The Commission is not required to assign an ATF for every project. If the Commission does not name an ATF, the rules allow members of the public to request appointment of an ATF (Minnesota Rule 7850.3600). The Commission would then need to determine if an ATF should be appointed or not.

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## COMMISSION DECISION OPTIONS

### A. Application Acceptance

1. Accept the Great River Energy route permit application for the Potato Lake 115 kV transmission line and substation project as complete, and authorize the OES EFP staff to process the application under the alternative permitting process pursuant to Minnesota Rules 7850.2800 to 7850.3900.
2. Reject the route permit application as incomplete and issue an order indicating the specific deficiencies to be remedied before the application can be accepted.
3. Find the route permit application complete upon the submission of supplementary information.
4. Make another decision deemed more appropriate.

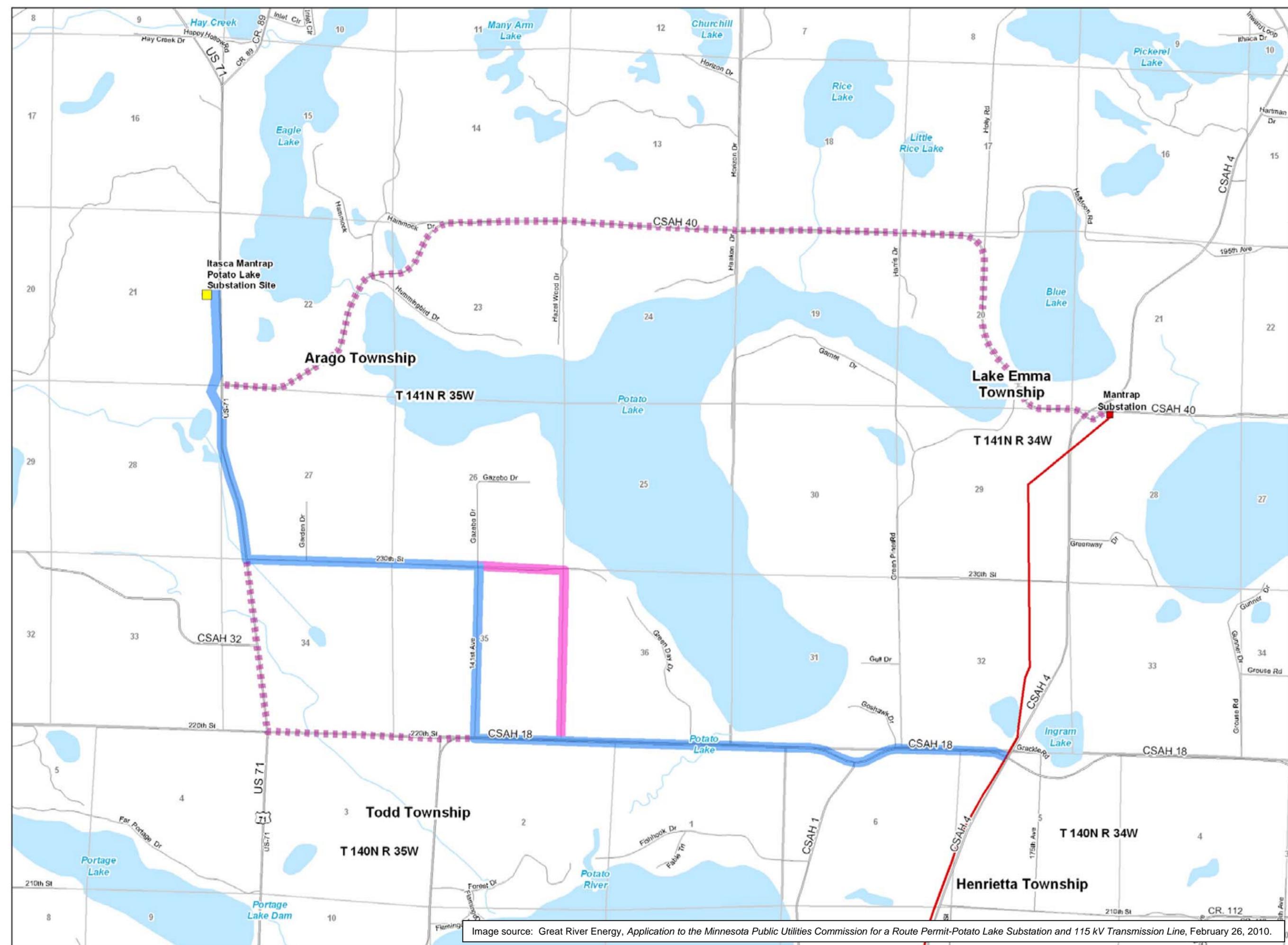
### B. Public Advisor

1. Authorize OES EFP staff to name a public advisor in this case.
2. Appoint a Commission staff person as public advisor.
3. Make another decision deemed more appropriate.

### C. Advisory Task Force

1. Authorize EFP staff to establish an advisory task force and issue the attached draft decision, structure and charge.
2. Take no action on an advisory task force at this time.
3. Determine that an advisory task force is not necessary.
4. Make another decision deemed more appropriate.

**EFP Staff Recommendation:** Options A1, B1, and C1.



- Proposed Itasca-Mantrap (IM)
- Distribution Substation
- Existing Itasca-Mantrap
- Distribution Substation
- Proposed Great River Energy (GRE)
- 115 kV Transmission Line Route
- Alternate Route
- Rejected Alternative Routes
- Existing Great River Energy
- 34.5 kV Transmission Line
- Existing Minnesota Power (MP)
- 34.5 kV Transmission Line
- Land Base Features
- Road Centerline
- Lakes and Rivers
- PLS Section Lines

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Updated: Feb 18, 2010

0 2,000 4,000 Feet

Data Sources Vary Between  
MNDOT, MNDNR, MNGEO  
and Great River Energy

Map Projection:  
UTM, NAD83, Zone15, Meters

**FIGURE 1  
PROPOSED PROJECT**

Potato Lake 115 kV  
Transmission Line and  
Substation Project

ET2/TL-10-86

Image source: Great River Energy, Application to the Minnesota Public Utilities Commission for a Route Permit-Potato Lake Substation and 115 kV Transmission Line, February 26, 2010.



In the Matter of the Route Permit Application for the Potato Lake 115 kV Transmission Line and Substation in Park Rapids, Minnesota.

**POTATO LAKE 115 kV PROJECT  
DECISION, STRUCTURE AND CHARGE  
PUC DOCKET NO. ET2/TL-10-86**

The above-entitled matter came before the director of the Department of Commerce Office of Energy Security (OES) for a decision on the appointment of an advisory task force (ATF) to advise the Minnesota Public Utilities Commission (Commission) on the route permit application by Great River Energy (applicant) for the proposed 115 kV transmission line project in Park Rapids, Minnesota.

**WHEREAS**, the applicant submitted a route permit application for the proposed Potato Lake 115 kV transmission line project on February 26, 2010.

**WHEREAS**, the Commission, under Minnesota Statute 216E.08, may establish an ATF to assist it in carrying out its duties. Under the statute the Commission shall provide guidance to the ATF in the form of a charge.

**WHEREAS**, an ATF shall be comprised of at least one representative from each of the following: regional development commissions, counties and municipal corporations, and one town board member from each county in which a route is proposed to be located. This statute further stipulates that no officer, agent, or employee of the applicant shall serve on the advisory task force.

**WHEREAS**, the ATF terminates upon completion of its charge, upon designation by the director of the OES of alternative sites or routes to be included in the environmental assessment, or upon the specific date identified by the Commission in the charge, whichever occurs first.

**WHEREAS**, on March 25, 2010, the Commission authorized the OES to establish an ATF with the structure and charge herein noted.

**THEREFORE**, having reviewed this information, the OES makes the following determination with regard to the need for and charge to an ATF relating to this matter.

**POTATO LAKE ADVISORY TASK FORCE AUTHORIZATION**

As authorized by the Commission, the OES establishes an ATF to assist in identifying impacts and route alternatives to be evaluated in the environmental assessment to be prepared by OES Energy Facilities Permitting (EFP) staff for the proposed Potato Lake 115 kV transmission line project. The Potato Lake ATF members will be solicited, as required by Minnesota Statute 216E.08, subpart 1, from the following governmental units:

- Headwaters Regional Development Commission (Region 2)
- Hubbard County
- City of Park Rapids
- Arago Township
- Henrietta Township
- Lake Emma Township
- Todd Township
- Leech Lake Band of Ojibwe

In addition, the ATF will include two private citizens, who live, work, or own property on or near the proposed project

The ATF will comprise no more than ten members.

The OES charges the Potato Lake ATF as follows:

1. ATF members will assist the EFP staff in identifying specific impacts and issues of local concern that may be included in the scoping decision document and evaluated in the environmental assessment, particularly regarding potential conflicts with local planning and zoning.
2. ATF members will assist the EFP staff in identifying potential alternative transmission line routes or route segments and alignments that may maximize positive impacts and minimize or avoid negative impacts of the project in the specific area of concern and may be included in the scoping decision document and evaluated in the environmental assessment.

The following issues will not be addressed in the scope of environmental review:

- A no-build alternative.
- Issues related project need, size, type, or timing.
- Routes segments or alternatives that would be unpractical or unreasonable, or would not meet the stated need of the proposed project.

ATF members are expected to participate with EFP staff in up to two meetings and to assist staff with the development of a summary of the task force's work including their preferences or recommendations, if any. Meetings will be facilitated by EFP staff or a facilitator engaged by OES staff.

The ATF will expire upon completion of its charge or upon release of the environmental assessment scoping decision by the director of the OES, whichever occurs first.

EFP staff is directed to appoint, as appropriate, members of the ATF and to begin work on the above-noted charge.

Signed this \_\_\_\_ day of \_\_\_\_\_, 2009

STATE OF MINNESOTA  
DEPARTMENT OF COMMERCE  
OFFICE OF ENERGY SECURITY

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William Glahn, Director

Sandra Stugelmeyer  
604 N. State St.  
New Ulm, MN 56073

March 17, 2010

Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place E. Suite 350  
St. Paul, MN 55101

Re: PUC Docket TL-10-86, proposed transmission line, Park Rapids

Dear Commissioners:

I am writing to request that you assign an Advisory Task Force for this project so that the public in Park Rapids, MN, will have better opportunities to understand the project and to voice their concerns. You have already received filings from several land owners along the route. Many other owners are interested in participating in public comment, however, they are wintering away from their Park Rapids homes at the present time. I believe this project is controversial enough to warrant the inclusion of a means for property owners to take part in the conversation.

Sincerely,

Sandra Stugelmeyer  
507-359-7879  
On behalf of my parents, Muggs and Neva Schield

Elizabeth I. Shaw  
15410 County 18  
Park Rapids, MN 56470

March 17, 2010

**CASE # 53884-TS  
DOCKET # TL-10-86**

Minnesota Public Utilities Commission  
121-7<sup>th</sup> Place E. Suite 350  
St. Paul, MN 55101-2147

Dear Commission Members:

I would like the Commission to note that my husband, Gary, and I plan to attend your meeting with Great River Energy at 9:30 a.m. Thursday, March 25. Decisions to be made in regard to the proposed Potato Lake transmission line route could greatly affect our family, many neighbors, and wildlife in the area.

I have stated in an earlier letter that we are opposed to this proposed route. There are many circumstances we would like your Commission to know about. For instance, did you know that the river on which we live is open all year? Trumpeter swans, as many as 20 or 30 at a time, have been known to spend their winters here. The river is the swan's flight path to land in this location. If the proposed transmission line were to be built without special mitigation, it could do harm to the trumpeters and eagles that use this flight path to land and hunt. (Yes, eagles hunt ducks and swans from the sky. It's amazing to watch.)

**I am asking the Public Utilities Commission to set up an Advisory Task Force so there can be input from local representatives.** There is much left to be discussed. Only recently have we gotten the chance to review Great River Energy's application. This is lake country, different from many places in the state. Homes have to be built on certain setbacks from lakes and rivers pushing them closer to the road. These lines, if erected, essentially walk right over peoples' homes. Our home. Our neighbors' homes. A task force would prove beneficial to many.

Thank you.

Liz Shaw  
Property owner  
218-732-9835 (H)  
garyliz@unitelc.com

Leon and Sandra Stugelmeyer  
604 N. State  
New Ulm, MN 56073

March 19, 2010

Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place E. Suite 350  
St. Paul, MN 55101-2147

Re: Case 53884-TS, Docket TL-10-86, your meeting on March 25th

Dear Commissioners:

You will be meeting March 25<sup>th</sup> at 9:30 a.m. to decide whether or not Great River Energy's Application is complete. We think it may not be complete for the following reasons:

- 1) Great River Energy has not adequately addressed the damage the High Voltage Transmission Line will cause to the property owners most adversely affected – those along the south end of Potato Lake on CSAH 18. Although these owners' concerns were expressed at the informational meeting in October, GRE has not offered an alternate route to avoid the front yards of these families. (See Maps 5 & 6 on pages 5-9 and 5-10 of the application). On page 11-5 under "Adverse human and natural environmental effects which cannot be avoided," the application fails to even mention the effect on the human beings living along the route and they recognize no environmental effects other than those during construction. We assure you, there are human beings whose lives will be greatly impacted by the proposed project and there will be permanent environmental effects that need to be mitigated. To state otherwise is simply ignoring those effects. They need to recognize these effects and offer mitigation strategies such as an alternate route.
- 2) The application says that the project "will not result in displacement of existing residences." While that may be true currently, what they have not considered are the dreams and plans of the property owners and their families. We have been helping Sandy's parents, Muggs and Neva Schield, care for their home at 15338 CSAH 18 for the 15 years they have lived there. Three years ago we contacted a surveyor, and more recently, the county zoning office regarding the possibility of building on that land and being able to care for my parents as they age. Both sources have stated that it appears likely that such a project would be feasible. If the HVTL goes through that land, it will take away that possibility because we would need the land closest to the road for the building site.

The Krautkremers have also written to you explaining the dreams and plans they have to build on their property; plans that will not be possible with the HVTL taking buildable land away from them. (See letter from the Krautkremers, 3/3/10.) I have spoken with others who have not yet voiced their concerns, but who also have plans to build. So technically, the HVTL may not displace current structures but it will preclude current plans for structures and displace the dreams of these families. Great River needs to complete their application by recognizing these concerns and looking for a way to mitigate these human settlement effects.

- 3) The application says that the proposed project "will have minimal aesthetic effects" on the land. (See page 11-1). This is certainly not true in the area along CSAH 18. This stretch of country driving is lovely, especially in the fall when all those deciduous trees are in full color. Behind the deciduous groves close to the road are towering Norway and White Pines. These trees are one of the aesthetic

effects so enjoyed by people who have chosen to live there and by others who vacation near Park Rapids. The application says that the 60-85 foot poles would be 2-5 feet into the private property and would necessitate clearing at least 50 linear feet of forestation and possibly more if the trees beyond that point are tall enough to affect the HVTL. (See pages 8-1 through 8-3.) There are some tall pines in this area. To lose them would not be minimal to those who have invested in the good stewardship of their properties. Nor is it minimal to the general public who are finding it increasingly more difficult to drive the country roads and find aesthetically pleasing views. Please envision one of the 85 foot poles in your front yard next to your driveway. (See the picture Liz Shaw sent to you on 2-6-10).

To mitigate the damage to the aesthetic beauty of this stretch of the project, Great River Energy needs to consider an alternate route. GRE needs encouragement from you to work on such alternatives.

- 4) The application does not address the issue of cultural values adequately. On page 6-12 the application names the major values within the region as "individualism and appreciation of natural resources." Then on the very same page GRE states: "No negative impacts to cultural values are anticipated; therefore, no mitigation is necessary or proposed." In other words, the individualism and appreciation of natural resources expressed by the property owners along CSAH 18 are not being considered by GRE. We know that there will be negative impacts to the cultural values of those property owners. There already have been. To say otherwise is failing to recognize the stewardship of the very people who have cared for that land for years. By claiming "no negative impacts" GRE is merely saying that they are not recognizing the negative impacts and, thus, do not need to mitigate them. In October, 2009, several property owners expressed that they felt their cultural values were in being assaulted by the proposed transmission line project.

Again, to reduce the negative impacts to the cultural values of the people most affected by this HVTL, we ask you to tell GRE that this application is not complete until they have considered all of the alternative routes away from CSAH 18.

- 5) The GRE application is not complete regarding the environmental impact the HVTL will have on the Potato River area. You have letters from the property owners describing the trumpeter swans and other wildlife and water fowl that make their homes in the area or frequent it daily. We have counted as many as 34 swans at one time on the Potato River in front of the Schield cabin near the dam. (See the attached pictures of the Potato River in the Winter). These swans fly north from the south end of the river near Fish Hook Lake, and as they near the dam they reduce their altitude. Neva Schield has spoken with a DNR representative about the impact of the high voltage lines strung across the river on one side of the dam or the other. His response was that there'd probably be some dead swans. He has seen these swans and done winter counting at the Schield cabin. The river runs swiftly there and stays open all winter so the swans, geese, and ducks are frequent visitors there, not to mention beaver, otter, Pileated woodpeckers, and many other species. The eagles fly the river quite frequently as well.

The application says on page 6-29 that "avian collisions are a possibility after the completion of the transmission line and could potentially increase as a result of the proposed line. Waterfowl are typically more susceptible to transmission line collision..." If the proposed HVTL is allowed to cross the Potato River at the dam site, the lines will be right in their flight pattern as they descend to feed north of the dam. We don't believe flight diverters will sufficiently protect the large population of swans, geese, ducks and raptors that fly the river daily and descend in area of the dam.

In addition to the loss of wildlife, stringing those electric lines across the river at the dam will certainly affect the recreational value of that site. People fish from that dam. Are we going to see lures hanging from the wires? People bring their boats down the river to the dam and enjoy the scenery. Do we

really need to ruin that? Again, Great River Energy needs to consider an alternative route that would mitigate the environmental impact of their project on humans and wildlife that enjoy the Potato River.

- 6) For those property owners whose homes are close to CSAH 18, the loss of 50 to 100 feet of trees and shrubs not only changes their view and damages the curb appeal of their homes, but it also reduces the noise buffer between their homes and the road. GRE's application does not address the increased noise the property owners will endure due to the clear cutting of their groves. Page 6-3, Table 6-1 of the application shows the sound level in units of decibels A-weighted dB(A). The GRE information indicates that even "a 10 dB(A) change in noise level is perceived as a doubling of noise loudness." How much more highway noise will be heard in the homes and yards along Potato Lake once 55 to 100 feet of forest is razed?

And yet GRE states on page 6-6 that "no [noise] impacts are anticipated." We disagree. There are noise impacts. Great River Energy should recognize that fact and tell how they plan to mitigate it in their application. They need to find a better route for the transmission line than the one along CSAH 18 that tears up the front yards of their fellow citizens, removing visual and auditory buffers between their homes and the roadway.

- 7) Another reason we believe this application is incomplete is because of the timing of the permit process. GRE says on page 11-1 that "the role of the Commission is to determine the best route to follow.... and to determine what mitigation efforts Great River Energy should employ to reduce any human settlement or environmental consequences." The timing is a "human settlement" issue. Thus far, many of the property owners have been at winter homes and unavailable to protect their interests and those of their neighbors. They have had no opportunity to discuss their concerns at a public meeting or to hear how GRE intends to mitigate the damages to their properties. (See the letter from Tony and Dorothy Platz dated 3-1-10). I hope that the Commission will not allow GRE to rush acceptance of this project before the snowbirds have a chance to defend their nests.

We also hope that the Commissioners will appoint a Citizen Advisory Task Force to meet with the property owners who have had no opportunity to be heard in a public meeting.

- 8) Has the application truly set forth the need for this project? On page 1-1 the application states that "the existing electrical system is approaching its physical limit to reliably deliver electricity to the area consumers." Also, that Great River Energy is planning for future load growth with a 115kV system for satisfying the long-term needs of the area. Are these *need* statements or *want* statements? We ask that the Commission request a thorough search into the need for this project. We understand that the length of the transmission line is 2.75 miles short of triggering an automatic requirement of a Certificate of Need. However, the proposed system will not be whole until the current 34.5 kV line along CSAH 4 is converted to 115 kV. So, in truth, the whole project is a much longer system, only split into two phases. From the Mantrap Substation to the Long Lake Substation is about 5.5 miles. So now we have a project that will actually be closer to 13 miles long if that entire existing line must be changed. Does that warrant a Certificate of Need?

Is there truly a need so pressing that GRE must build an oversized line on monster poles so that in five, or maybe more, years they can develop areas further to the north? On page 2-3 they state that the line would be run at 34.5 kV for 4-5 years before converting to 115 kV. Will it even be that soon? And then the 115 kV loop wouldn't be developed for 10 – 15 years. If this project is basically about preparing for future development north of the currently developed Park Rapids area, as several residents have said it is, then why not build the project north? Why not build the line ahead of the development in the area to be developed? And, perhaps something on a smaller scale would meet the actual needs of the

existing customers and be less intrusive. Perhaps additional capacity for the developed area around Potato Lake could be obtained in a less damaging and less costly manner.

In these hard economic times should the energy company be spending \$4,421,492 if it is not imminently necessary? (See page 3-4). They say it will help bring more reliable energy to 821 customers. That's \$5,385.50 per customer. On page 2-4 GRE gives the historical and projected peak winter demand in MW measure for the Mantrap and Long Lake Substations. In the historical numbers are two years of significant growth – the last two years of the infamous housing bubble. Now that the bubble has burst, we wonder if Park Rapids will experience even the 3% projected growth built into GRE's projections of need.

According to the permit department at the Hubbard County Offices, the building permits for all new and remodel projects in 2009 were 30.5% fewer than in 2005. There has been a steady decline of building for the last five years. Perhaps it will level out in 2010, and perhaps it will continue to decline. The point is, if people can't maintain mortgages on their first home, they certainly won't be building or buying a cabin near Park Rapids.

- 9) Finally, is the application complete if GRE has not offered alternate routes that would spare the currently developed areas and the homes of its current customers? We urge that consideration be given to placing the transmission line along the north side of Emma Lake and Arago townships through unsettled land. Now that would be a truly long range idea and it would place those monster poles out in unsettled land before development starts. Why not lead the development rather than tear it up after people have invested their lives in making it beautiful?

We urge GRE to reconsider the County Road 40 option. It is a shorter, more direct route, and it would run directly from substation to substation. We think there would be fewer homes affected by the lines on County Road 40 than on CSAH 18.

Or go south. There is unsettled land just south of CSAH 18 parallel to the proposed route. Liz Shaw has submitted a map to you showing the possible alternative that could be used to save the front yards of the Potato Lake property owners. See her letter and map dated 2/6/10. She has also sent this map to Michelle Lommel of Great River Energy. The property owners may not be opposed to the HVTL running behind their homes because it would save their front yards. GRE would rather use roadways because of convenience for construction and repair, however, there are transmission lines through many forests and fields all over the state. Better to deal with a little inconvenience now than to ruin the aesthetic value of the roadway, the river, the dam, and the properties forever.

There are alternatives that need to be considered more seriously.

For all these reasons we believe there is a lot more homework to do on this application.

Sincerely,

Leon and Sandra Stugelmeyer  
507-359-7879  
[lgssls@newulmtel.net](mailto:lgssls@newulmtel.net)

cc: Representatives Brita Sailer and David Bly

The Potato River in the winter, just north of the dam on CSAH 18.



March 19, 2010

Holly Krautkremer  
15003 County 18  
Park Rapids, MN 56470

**CASE # 5384-TS**  
**DOCKET # TL-10-86**

Minnesota Public Utilities Commission  
121-7th Place E. Suite 350  
St. Paul, MN 55101-2147

Dear Commission Members,

My husband and I are unable to attend the meeting scheduled for March 25, 2010 with Great River Energy in regards to the high-voltage transmission line. We are opposed to the proposed route as stated before in our previous letters to the Public Utilities Commission.

Do to our inability to attended, I ask the Public Utilities Commission to set up an Advisory Task Force so there can be input from the ones that are directly affected by this project. There are a lot of unresolved issues that need be addressed. This need is further compounded by the fact that the meetings are being held several hours of commute away from the ones that this directly affects. Not everyone involved is able to travel that distance, therefore again, I am requesting that the Public Utilities Commission set up an Advisory Task Force; our interests and those of our neighbor's need to be taken into consideration as well.

Thank you,

Holly Krautkremer  
Property Owner  
(218) 237-1980  
Catrules97@yahoo.com

March 19, 2010

Jamie Krautkremer  
15003 County 18  
Park Rapids, MN 56470

**CASE # 5384-TS**  
**DOCKET # TL-10-86**

Minnesota Public Utilities Commission  
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Thank you,

Jamie Krautkremer  
Property Owner  
(218) 237-1980  
Jamez\_k@hotmail.com

M.L. and B.J. Schield  
15338 County Rd 18  
Park Rapids, MN 56470

March 20, 2010

Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place E. Suite 350  
St. Paul, MN 55101

Re: PUC Docket TL-10-86, proposed transmission line, Park Rapids

Dear Commissioners:

We are writing to request a Citizen Advisory Task Force for the proposed transmission line project noted above. Many land owners are very concerned about the environmental, financial, aesthetic and potential health impact of this project. We need the opportunity to understand more fully and express our concerns about the impact of this project to our property and our community.

Several land owners are away from Park Rapids for the winter and have not had the opportunity to participate in the discussions regarding this project. Please assign a Citizen Advisory Task Force so all those impacted by this project can have a voice in the process.

Sincerely,  
M.L. and B.J. Schield  
218-732-3356