

Gary Shaw  
15410 County 18  
Park Rapids, MN 56470

May 31, 2010

Office of Energy Security  
Scott Ek, State Permit Manager  
85 7<sup>th</sup> Place East, Suite 500  
St. Paul, MN 55101-2198

Re: Docket TL-10-86

Dear Mr. Ek:

I kind of get the feeling that when Great River Energy (GRE) submitted their application fee for a transmission route and substation permit, they might have thought they were buying one.

The reason I think that is because here in Park Rapids, the “proposed” substation site had already been staked and developed. It was a though the cart were placed before the horse. That Saturday before the first Advisory Task Force meeting, we got a newsletter from Itasca-Mantrap (I-M) announcing the upgrade and explaining how GRE was going to permit, route and build this line and where it was going to be placed.

Apparently assumptions were made. “It’s a done deal,” we heard time after time. These statements have proven to be intimidating and misleading and created plenty of confusion for property owners along the proposed route. I-M purchased and develop the site in preparation of the substation even though a permit has not been issued. Purchasing could be seen as wise on their part, yet to develop it to such an extent could be misconstrued as something entirely different.

Why this has become an issue, when a citizens’ Northern Route started to become an option after the March 25 hearing with the Minnesota Public Utilities Commission, it made only good sense to locate the substation approximately three or more miles north and in good proximity of GRE future plans to head west to the Pine Point Substation located west of Two Inlets.

The Northern Route comes with two options, and links the Highway 71 34.5 kV distribution line with the line near 280<sup>th</sup> Street near CSAH 4. This is a favorable route made up of five miles of county and state land. It is largely undeveloped and could also be utilized as a site for a substation. This gets both the line and substation out of eye’s view and protect homes and businesses along Highway 71, and Counties 18 and 40. It would protect a major lake chain from impact and mitigate danger to a hotbed of threatened species in Potato River.

Also, the proposed line would run a 115 kV line (for use as a 34.5 kV line) from the proposed Potato Lake substation to a tap point located on the CSAH 4 existing 34.5 kV

line. This tapping doesn't improve reliability; rather it reduces current voltage for users on the Mantrap substation. Tapping into lines doesn't strengthen service for anyone: rather, it weakens reliability for customers beyond the tap point.

GRE showed a level of disrespect to the people of this area when they put in their 2009 line along Highway 34 as you enter Park Rapids. We don't want more damage done to the beauty of Counties 18 and 40 where distribution lines are already buried. Further, Highway 71 is a vital artery to the tourism industry as the gateway to Itasca State Park.

For these reasons I would propose the line run on the Northern Route as the PUC deems fit. It could run only from Highway 71 to Emmaville at this time. If the PUC sees the line needing to continue to the Mantrap substation, then let GRE get a certificate of need. Of course, another solution would be to have GRE put that line in when they are ready to complete a line from the Long Lake substation to Mantrap. The line could be extended to under 10 miles at that time and private property owners on CSAH 4 would have a chance to be heard. It's only fair.

Another option, as a unified voice is calling to let new technologies in burying the lines. It is time to press utility companies into stop their practice of "business as usual." They should be driven to do better as an act of good will to do what's best for the state of Minnesota. They have enough talent with their engineering staff to come up with innovative just as they are doing in other parts of the country. I understand a 115 kV is small compared to the 500 kV lines that are going underground in Tokyo, Denmark and other sites. Even 230 kV-lines being buried is becoming a new standard. I'm not saying it would be easy to transition to a new standard of thinking, but I'm sure they have the brainpower to get it done if urged to do so.

It's interesting to note in Michael Monsrud's CEO Report to I-M customers this month:

*"The slow economy and reduction I use of electricity due to energy conservation leaves Great River Energy with excess electricity. The record low market price for electricity combined with the higher prices paid by Great River Energy for wind power through binding contract, is causing our wholesale cost of power to increase."*

So where is the need? Can someone explain to me why we are being asked to carry the burden for I-M and GRE? The economy slowed in the Park Rapids region as well. New construction is down. One new home was built in Park Rapids last year. County building permits were down last year.

If there needs to be a line, put that line and substation along the Northern Route.

If there is no other way to construct a line other than put one on County 18, I would kindly ask the PUC to put some mandate in writing into the permit, but please understand we are only requesting this if there is no better solution available:

1) Keep the poles on County 18 at 400-foot increments where possible. A GRE engineer told us that is what is likely to happen on 18 since the lines wouldn't have to carry distribution lines. We would like that in writing.

2) We also understand pole height won't have to be as tall since there is no distributions lines to carry. We would request the poles be at minimum height and still be in safety guidelines: 60 or 65 feet would be better than 70 or 80 feet.

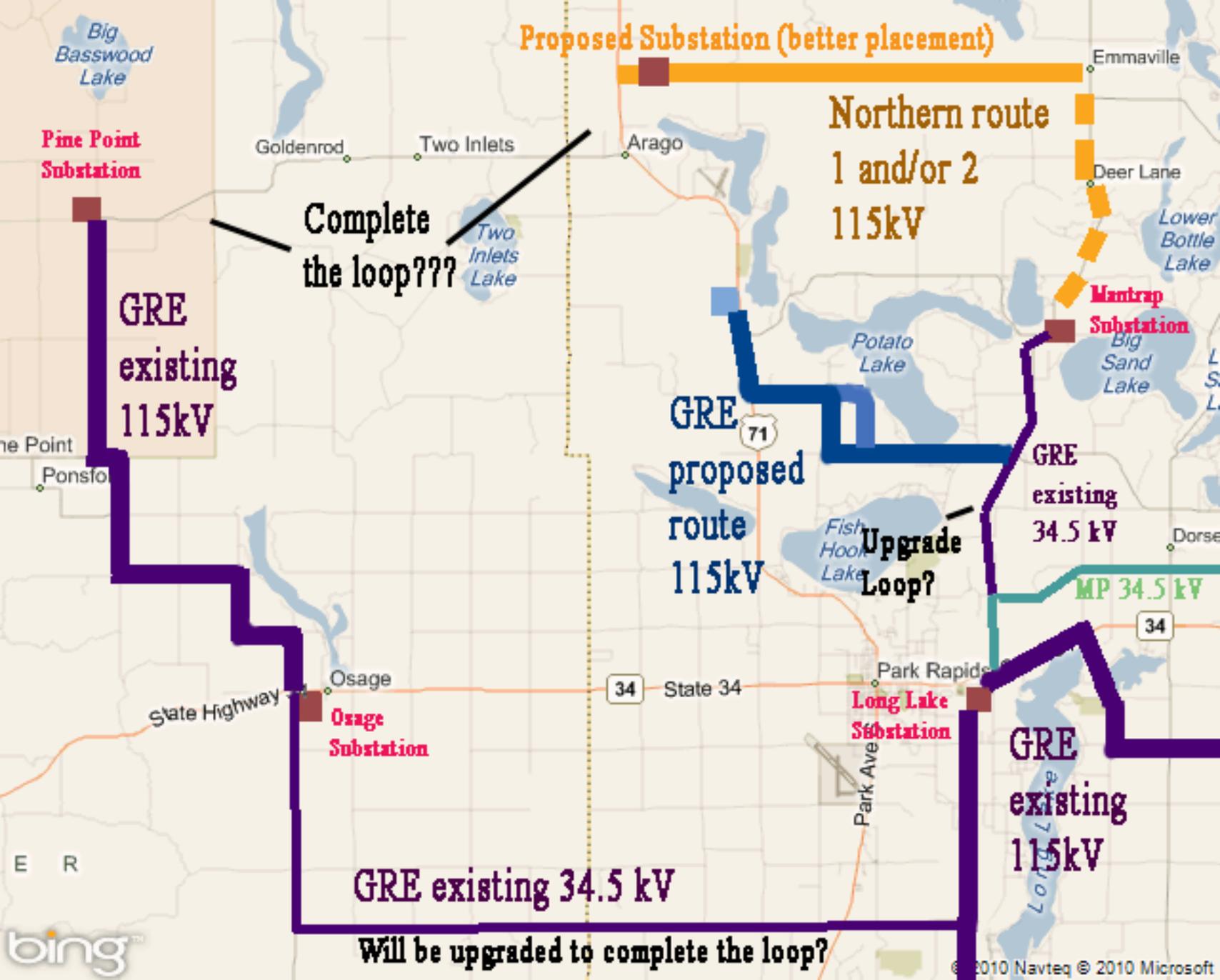
3) Limit clearcut to only what is necessary. This would have to be written into the permit based on past practices by GRE's line in 2009.

4) To place lines a minimum distance from the center line, especially at difficult locations along the route. GRE is asking for 50 feet. Could it be closer to 40 or 35 feet. On Sunday we measured a pole they have on the line that stretches from the Osage substation to the Pine Point substation. It was only 35 feet from the road and nicely spared a farmer from having it placed on his farmland. Also, keep easement requests of GRE to the bare minimum.

5) Place poles located in "poinchpoint" sites at 35 feet from the center line and put it in writing in the permit if this is possible. One example would be on County 18 at our home. Our neighbor across the road is 92-feet from the center line. Our garage is within 150 feet of the center line. We understand that we and the Schields next door may have to put a pole at our property line if the proposed route would be located on County 18. Please spare us anything you could give if this were to be the case. It's a tight spot.

Thank you for the job you are doing. Thank you for hearing our concerns.

Gary Shaw  
County 18 property owner



Proposed Substation (better placement)

Pine Point Substation

Complete the loop???

Northern route  
1 and/or 2  
115kV

Mantrap Substation

GRE proposed route  
115kV

Upgrade Loop?

GRE existing  
34.5 kV

MP 34.5 kV

GRE existing  
115kV

Osage Substation

Long Lake Substation

GRE existing  
115kV

GRE existing 34.5 kV

Will be upgraded to complete the loop?

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

May 24, 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:

At the PUC meeting on March 25, 2010, I was able to participate in a discussion with you concerning the determination of need for the TL-10-86 HVTL and Substation project. It was disheartening to hear that the issue of need might not be a legitimate topic of conversation for the PUC because of the Alternative Permitting process being used by GRE. However, it appears that the PUC really is not precluded from discussing need, according to the public advisor. The citizens of Park Rapids, have raised the question of need and introduced it in the record, so that opens it up for the Commission to consider.

I ask you to bring in objective experts who will scrutinize the most current data to determine whether this project is needed at this time. There have been many alarming statements made by GRE representatives regarding when the 115 kV might be needed. Since they have divided the entire 115 kV project into two phases, the length of the current phase was kept under ten miles, thus precluding the requirement for a Certificate of Need. Is this the right way to go about building utility projects? Is this happening as a matter of course in other parts of the state? Regardless, the PUC can still discuss need and bring in objective experts to prove or disprove this issue.

If it is determined that a need truly exists, I ask that the project will be accomplished using public lands rather than private property. It is puzzling to me that the county and state lands from Emmaville straight west to Highway 71 were not considered as the first choice for a public service project. Since there are already poles and lines along CSAH 4 and Highway 71, getting to and from the public lands might not require any more easements. GRE may say that the project would be bigger and too costly. However, who will put a price tag on the loss of a scenic drive to resorts, homes, cabins, the Logging Camp restaurant, and public boat access points? Once that aesthetically inviting scene is gone, it is gone forever. At what cost to our children for generations to come?

And what might be saved if the project were put where Itasca-Mantrap and GRE can do it the most conveniently? I heard that this was a \$4,400,000 project. I asked an Itasca-Mantrap representative if that wasn't a little expensive for the customers who would benefit. He said there were 821 customers but that they would not bear the cost alone. Rather, the 28 cooperatives with roughly 15,000 customers each would share in the cost. So that's 420,000 customers. And he said this would be spread over 40 years. So then, \$4,400,000 divided by 420,000 is \$10.48 per customer, divided by 40 years is \$0.26 per customer per year. So then, even if the project cost doubled in order to do the right thing for the environment and for the culture and the aesthetics of the lake country, the most it would cost GRE's customers would be an extra \$0.26 per year. Is this correct?

Thank you for considering my thoughts,

Sandra Stugelmeyer  
For the beauty of the lake country of Minnesota.  
507-359-7879

Sandra Stugelmeyer  
604 N State St  
New Ulm, MN 56073

May 31, 2010

Mr. Scott Ek  
Office of Energy Security  
85 7<sup>th</sup> Place East, Suite 500  
St. Paul, MN 55101-2198

Re: TL-10-86 Proposed Transmission Line and Substation north of Park Rapids

Dear Mr. Ek,

Leon and I were visiting my folks again this past weekend at their home on CSAH 18 north of Park Rapids. Our son Levi also joined us. I was reminded again of the value of the scenic lake country that draws many to vacation around Park Rapids. As we drove along CSAH 18 enjoying the trees on either side of the road, I envisioned the ugliness that would be there if the TL-10-86 high voltage transmission line project is allowed to proceed on that route.

One day we drove east out of Park Rapids along Highway 34 where a new transmission line was recently placed by GRE. It just doesn't look like the north woods there anymore. When will the citizens and the citizens' representatives stop this indiscriminate destruction of the beauty of our land? There has to be a way to provide power without taking away the aesthetic scenery of the lake country which is an integral part of the culture of a people. When Levi brings his children to the "cabin" will they experience the beauty we now enjoy? Or will every roadway be filled with poles and lines and all the trees gone or topped?

I urge you to consider the route proposed by citizens that would run north along CSAH 4 where utility lines already exist, then west from Emmaville to Highway 71. I also urge you to put the substation on the east side of Highway 71 at the west end of that route. If the substation is placed where Itasca-Mantrap suggests, it will require those huge 85' poles to be run along Highway 71 and destroy the beauty of a major access road to Itasca State Park and the Headwaters of the Mississippi. People come from all over the world to the Headwaters and Highway 71 is the road they take. Do we have to make that road ugly?

If the far northern route is chosen and the substation site is placed further north, then the three major roadways through the lake country north of Park Rapids – Highway 71, CSAH 40, and CSAH 18 – would be spared from devastation to their scenic value. As the GRE application states: "The main attraction for tourists coming on the rail (railroad) was Itasca State Park, Minnesota's first state park. Tourism remains central to the regional economy. The residents in the Project area likely value the natural environment and the opportunities natural resource-based industries bring to the region." (Page 6-12) Yes, the residents value the natural

environment and the Headwaters – so does the world. Let's keep Highway 71 scenic and beautiful.

I also drove from Highway 71 to the Pine Point Substation and then to the Osage Substation and back to Park Rapids this weekend. On page 2-3 of the GRE application it says that GRE's long range plans may include a "looped 115 kV transmission system" in the future. On March 25<sup>th</sup>, I asked GRE representatives what that meant and I was told it was a future line from this project to the Pine Point Substation. If that happens in the future, then placing the TL-10-86 substation further north would facilitate a shorter and less expensive "loop" to the Pine Point Substation. In fact, the "loop" would then encircle the entire lake country region, offering great electrical capacity without devastating the scenic value of the three major roadways tourists and residents travel – Highway 71, CSAH 18, and CSAH 40.

I have heard recently that running the transmission line from Emmaville west to Hwy 71 could also provide a much needed fire break for that part of Hubbard County.

Thank you for considering my suggestions on behalf of our scenic roadways and inviting natural resources in the lake country of Minnesota.

Sincerely,

Sandra Stugelmeyer



## United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Twin Cities Field Office  
4101 American Blvd E.  
Bloomington, Minnesota 55425-1665

June 1, 2010

Office of Energy Security  
Energy Facility Permitting  
85 7th Place East, Suite 500  
St. Paul, Minnesota 55101-2198

Dear Mr. Ek,

Thank you for involving the Fish and Wildlife Service (the Service) in the planning phases of Great River Energy's (GRE) Potato Lake 115 kv substation and transmission line in Hubbard county. This letter is in response to your inquiry regarding potential effects of this project on bald eagles (*Haliaeetus leucocephalus*) and other migratory birds during the construction of the line and its subsequent long-term use. Although the bald eagle was delisted pursuant to the Endangered Species Act on August 8, 2007, it remains protected from harassment and disturbance under the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act (Eagle Act). The Eagle Act (1940) defines "disturb" as, "to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, 1) injury to an eagle, 2) decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or 3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior." The Service has generated The National Bald Eagle Management Guidelines (<http://www.fws.gov/midwest/eagle/guidelines/guidelines.html>), which are intended to help landowners and project proponents minimize disturbance to bald eagles, thereby benefiting bald eagles and protecting landowners. The Service strongly encourages adherence to these guidelines.

As GRE begins its Environmental Assessment (EA) of this project, we ask that special attention be paid to Important Eagle Use Areas. This is defined under 50 CFR §22.3 as

"an eagle nest, foraging area, or communal roost site that eagles rely on for breeding, sheltering, or feeding, and the landscape features surrounding such a nest, foraging area, or roost site that are essential for the continued viability of the site for breeding, feeding, or sheltering eagles."

Disturbance or landscape alteration around Important Eagle Use Areas (including indirect effects) could result in take or disturbance of eagles. The EA needs to examine effects on eagles of the construction phase, as well as the long-term impact of the transmission line. The Service recommends siting potentially lethal infrastructure (such as transmission lines) away from nests, foraging areas, and communal roost sites. A typical bald eagle home range is two miles. We recommend the following actions be undertaken for the EA:

- Complete an eagle nest survey within two miles of any potential line placement or upgrade. Historic nest sites should be visited to determine if the nest is still present. Because data in the Minnesota Department of Natural Resources (MN DNR) database might not be current for Hubbard County, surveys should be done for any new nests. Nest surveys are most easily done when foliage is absent (fall, winter, or early spring). Nests of other migratory birds should also be noted, such as other raptors and colonial nesting birds (herons, egrets, cormorants, etc).

**Known bald eagle nests**  
(information current as of 2007)

North side of Island Lake (1 nest)  
North side of Potato Lake (3 nests)  
Vicinity of Fishhook Lake (3 nests)  
South side of Big Sand Lake (1 nest)  
South side of Lower Bottle Lake (1 nest)

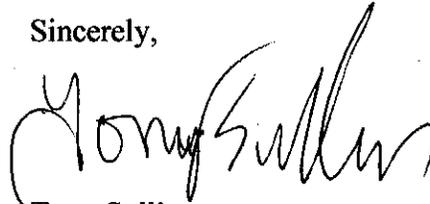
- Nests are only one component of Important Eagle Use Areas. We recommend surveys be completed for foraging, roosting, or wintering areas within two miles of all potential line placements. Because use of these locations can change throughout the year, we recommend a fall (pre-water freeze) and a winter (post-freeze) survey to determine use and location. Activity of other migratory birds should also be noted at this time, including waterfowl and water bird concentration areas (especially during spring and fall migration).
- GRE can request the help of the Service, MN DNR, local birding groups, and private citizens to supply information on likely nests and other Important Eagle Use Areas. These can be compiled into likely locations to streamline surveys.
- We recommend GRE examine the feasibility of constructing transmission lines at the same height as surrounding vegetation to reduce avian collisions.
- Transmission poles should be designed to discourage raptor nesting.
- In areas where eagles and migratory birds are present, line markers and diverters should be used. We recommend GRE examine the type and efficacy of different markers and diverters, as well as documented responses of surveyed bird species to these markers.
- The Advisory Task Force (ATF) has proposed an alternate northern route located west of Emmaville that runs a straight line directly from County Highway 4 to Highway 71. When looking at alternate line locations, we recommend GRE compare the environmental costs of placing a line through a roadless area versus an existing right-of-way.

- The ATF has expressed concern regarding preservative-treated transmission poles and possible effects on wetland and limnic ecosystems. We recommend this concern be researched and possible alternatives explored.
- Construction timetables should be designed to do much of the work outside the eagle and migratory bird nesting season. One consideration to this recommendation is if a winter use area is found near the preferred route.

Once potential routes have been chosen and bird use of these areas is verified, the Service will work with GRE to determine if an eagle disturbance permit (for construction or long-term line use) is necessary. The Service will also be able to advise GRE on any appropriate minimization or mitigation measures at that time.

Again, thank you for including the US Fish and Wildlife Service in the planning phase of Great River Energy's project. If you have any questions regarding our recommendations, please contact Margaret Rheude at (612)-725-3548, extension 2-202.

Sincerely,

A handwritten signature in black ink, appearing to read "Tony Sullins". The signature is fluid and cursive, with a large initial "T" and "S".

Tony Sullins  
Field Supervisor

cc: (email) Katie Haws, MN DNR  
Elizabeth Shaw, Potato Lake Advisory Task Force

To: Scott Ek  
Office of Energy Security, Energy Facility Permitting  
85 7<sup>th</sup> Place East, Ste 500 St Paul MN 55115

From: Dick and Florence Witkop  
14758 County 18, Park Rapids MN 56470  
[fwitkop@gmail.com](mailto:fwitkop@gmail.com)

**Regarding the Great River Energy-Potato Lake 115 kV Transmission Line and Substation Project (PUC No. ET2/TL-10-86)**

We live on County 18 and could have a high-voltage line in our front yard if this project goes through. We accept that such lines must go somewhere.... but.....

**We believe this particular line should not have been proposed in the first place:**

- \*GRE and Itasca Mantrap do not offer convincing evidence that this project is needed.
- \* If it ever does become necessary, they indicate that need could be 30 to 40 years in the future, when technology could have improved to the extent that this proposed system could be obsolete.
- \*The several alternate routes GRE and Itasca Mantrap have considered do not appear to us to lead to the same area, causing us to wonder whether they have thought through the ultimate potential customers to be served by this project.
- \*It's expensive. No matter how small the final cost seems when spread among all the members of the GRE coop, it's still a lot of money. Hey, have you noticed that money is short these days?!! Why spend money you don't have to spend on a project that definitely isn't needed now and may never be needed?

**If GRE does proceed with this project, we believe it should go through the woods:**

- \*There is no reason not to put a line through the wilderness and many reasons for placing one there. Having owned a resort with a transmission line that went through the wilderness portion of our property and straight on to our resort buildings, in the fifteen years we owned and operated that resort we observed no destruction to the wilderness or to the animals, birds, etc. living in that wilderness. The only thing we noticed was how nice it was to walk along the highline in the evening and how hunters and animals used the cleared path to ease their way through the woods.
- \*According to Steve Ek at the public meeting in Park Rapids, today's utility lines do not harm the environment. They are carefully designed and constructed for minimal to no impact on the environment at all.
- \*A high-voltage utility line along roads and over the houses and heads of the people living in those houses does pose a potential health risk, especially if the lines eventually carry higher-than-stated voltage, which is a possibility given the easement GRE is asking for.
- \*The scenic detriment the proposed line will cause to this area cannot be understated. Today there are no utility lines in view at all through this area

because they were buried by Itasca Mantrap. At the time, we were told that part of the reason for burying the lines was Itasca Mantrap's concern for the pristine look of this wilderness area.

\*It is impossible to understate the problems that will be created by the loss of property values if the line is built near homes. The larger the voltage, the taller the poles, the greater the loss of value to nearby homes and businesses. The proposed voltage is sufficient to noticeably impact the value of property in the area. If that voltage is later increased, which seems a reasonable expectation, property will be devalued even more, leading to drastic loss of investment in homes and businesses. Many people in this area simply cannot afford such a loss. This loss should not happen because of a project that GRE says may become useful 30 to 40 years in the future, if ever.