

Date 5/24/2010

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 am in favor of locating Great River Energy's 115 kV transmission line along the northern alternative route located west of Emmaville from CSAH 4 to Highway 71. If the substation were to also be located at this vicinity, it would be a preferred site for future growth needs.

This route is better than CSAH 18 or CSAH 40 because it is primarily county and state land, affecting as few private properties as possible while preserving the aesthetics of our lake sensitive area, wetlands and tourism industry.

Thank you.

Warren Meyer  
Name

6980 Lora Lee Lane  
Address

Eden Prairie, MN  
City, State  
55346

*30 years I own  
land on both  
sides along  
18. I do Not  
want it on the  
Lake <sup>south</sup> Side,  
of course,  
I would rather  
Not have it  
at all. →*

we want  
to build &  
move there -  
into our lake property  
we will have no lake side  
left! No privacy. No  
Resale value!! We have  
a difficult lot to build  
on anyway now it will  
be even worse. The  
County may not let us  
with this easement!

(Your name) Bonnie Miller  
(Your address) 19059 Grouse Road, Park Rapids, MN 56470

(Date) May 4, 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 am in favor of locating Great River Energy's 115 kV transmission line along the northern alternative route located west of Emmaville from CSAH 4 to Highway 71. If the substation were to also be located at this vicinity, it would be a preferred site for future growth needs.

This route is made up of primarily county and state land, affecting as few private properties as possible while preserving the aesthetics of our lake sensitive region and tourism industry.

Thank you for your consideration.

(Name/signature)

Bonnie Miller

BONNIE MILLER

Scott Ek

Office of Energy Security, Energy Facility Permitting

85 7th Place East, Suite 500 | St. Paul, MN | 55115

Email: [scott.ek@state.mn.us](mailto:scott.ek@state.mn.us) | Facsimile: 651-297-7891

In response to Great River Energy's (GRE) Potato Lake 115kv Transmission Line and Substation Project  
PUC No. ET2/TL-10-86

Project Purpose (To me this is the number one problem).

The final destination of the project is known to be Pine Point, which in its finality becomes a much longer than 10 mile high voltage transmission line. The current project proposal states that the line will not be used at 115k for four or five years. This leads me and many others to believe that this is when GRE has planned completion of the build to Pine Point to junction with existing lines there. I believe the purpose, planning and intent of this project has been mischaracterized and designed to skirt the laws that requires high voltage transmission lines over 10 miles to have a comprehensive environmental impact study and additional requirements required to obtain a certificate of need. The current plans also allow for a divide and conquer scenario. Approaching this build as they are, GRE does not have to confront as many residents, who in turn could be much more able to produce a stronger opposition than they can divided. I submit that GRE's current approach has been taken to avoid the more thorough study, including the aforementioned comprehensive environmental impact study, and a much stronger opposition. Shouldn't the residents along the route to Pine Point when finalized be informed now? I have seen those who may be in the next phase told there is absolutely no such plans. This resembles how we were informed at the last public meeting this plan has been around since 2002 but none of use in the current affected area has ever been made aware of such until now.

It is my opinion that by GRE pursuing in this fashion, it creates a position that misrepresents the total impact to residents, the environment, and protected wildlife to the overseeing government officials. This seems contrary to reasons these laws were created, and thus should be considered as an attempt to circumvent these laws.

Aesthetics, recreation, and unique environment

The current project as GRE has proposed will destroy one a most pristine and visually appealing areas the Park Rapids area is famous for. Park Rapids survives primarily as a tourist town prized in large part because of this kind of scenery and unique character. The Logging Camp is one addition to this character, along with generations of people enjoying the yearly fishing and gorgeous scenery while frolicking in the waters at the damn/bridge not far down the road from the Logging Camp. The farther people will have to leave Park Rapids to enjoy this, the less likely Park Rapids will enjoy the fame of its beauty and remain the tourist hotspot it is. Golden and bald eagles nest just a naked eye shot south of 141<sup>st</sup> avenue in a wetland area. I have witnessed at least 5 years of hatchlings. When I was young I rarely caught glimpse of any form of eagles anywhere near Park Rapids, now I see them flying over my home daily. I worry for these birds as I have seen a new power line in Bemidji kill off an established nesting area despite all the precautions that were supposed to protect these birds. Some died from ordinary accidental contact electrocutions at poles. And in one case, a nest was built right on a pole, even resulting in a successful egg hatch, only for the entire nest to catch fire one day from something creating an arc to the power lines before the young birds could fly. As far as I know there are no longer eagles nesting in that area. I have not lived or have frequented the area in many years now but from what I see in rare passing there are no signs of such.

Damages/Proximity to residents, and future development.

As proposed GRE's power line will intrude directly in front of or in some cases possibly right OVER houses, and decimate the privacy and beauty which is exactly why most of us live here. This could completely stop planned additions and development of property for many involved. I have heard of at least two of these cases, where the entire purpose to purchase the affected land was to develop. My primary concern and example is 141<sup>st</sup> avenue as I live on this road. One of my properties on this road will no longer be developable as planned *if at all*. If the power lines are to follow on either side of this road it will be perilously near or over the houses on one side or the other, my mother's house could be one of these depending on the side of the road the lines follow.

At one of the first public meetings I introduced an alternative route of almost exact distance to a GRE representative that will bypass at least 13 housing units on 141<sup>st</sup> and part of CR18. This alternative route is the one included with GRE's proposal. Although the alternative route does involve small low lying areas and possibly more wood-land, much of this area has been routinely logged or is currently a small road or trail. Choosing this alternative route represents a dramatically lessened impact to local housing and the adverse affects. This route should not create much challenge for line maintenance once completed. An additional benefit could be that almost the entire neighborhood's residents are avid deer watchers and environmentally responsible hunters. Opening a path such as this may help encourage deer travel along this corridor and it may be possible the deer population could benefit from this. The alternative route will also help distance the nesting areas I mentioned previously, however I am not an expert on the nature and habits of eagles and cannot say how far the lines would need to be to prevent interaction. I will venture to guess that it should help. It may also be possible (if the Safratowiches agree) to lessen the visual impact more by following the road west from the alternative paths north eastern corner deeper into their north field which makes it farther from the roadway leading to Northern Pine Lodge allowing a tree line to help cover the view, then crossing the Northern Pine road north across a current opening *before* intersecting with 141<sup>st</sup>av. From there continuing west crossing the road that continues from 141<sup>st</sup> ave to what used to be referred to as "Shipwreck", into Potlatche's land and on. Unfortunately I have no particular ideas from that point or beyond that may help minimize impact or avoid the particularly deep and marshy swamplands that exist past this point. Overall I strongly believe and wish to convey that this alternative route should be a much more cost effective and much less damaging route for GRE and the residents it will bypass. (image at the end)

Another idea for routing

To bypass more residents it could be possible to cross existing clear fields that run from CR4 to CR18. This will eliminate the affects to the people it excludes and may be almost non-intrusive. With this routing primarily crossing grazing land, there are few negatives I can think of, with exception of periodic maintenance to the lines. Nobody would live extremely near these lines, and a much lessened amount of trees and privacy would be affected. This may even reduce the total distance of this transmission line. Considering the value held for sanctity, privacy and security are in fact the very reason we live where we do despite the lack of the conveniences of larger cities. Any way to minimize damages to as many residents as possible should be considered, even if it's not a "normal" standard.

I have attached an image at the end of this letter to better illustrate this possible route.

Yet another alternative route

I have been made aware at the last public meeting to yet another alternative route has been proposed by others of the Potato Lake Association. It seems this proposed route would bypass the entire existing proposed route, sticking to already widely cleared area following CR4 towards Emmaville, and then through a large area of state owned land. It was said this would have less residential impacted, and of these, most will have a lesser impact because the road has a large existing clearing. I will leave this to those others to promote as I do not have a great enough understanding of that area to make any informed additions. However I strongly hope any alternatives to bypass this scenic area as currently proposed is carefully studied and considered.

EMF/Safety

As many times as it's been researched there are still many conflicting results on how the corona of high voltage power lines affects those living near them. I have been informed recently my mother, Judy Miller, has concluded she will not risk these possibilities and has started to consider a move somewhere away from these lines if they are built on her (our) side of the road, and possibly even if they are built on the opposite side and not built on an alternative route. These lines will be extremely close to her house, and she will lose the privacy of the current trees. In fact her plans will be to leave Park Rapids entirely if this happens to her home. I have recently also heard similar comments from others living in the affected area. Not only will these homes be abandoned, they will be *very* hard to sell at a reasonable value for the seller. This transmission line could add to current recession created losses of tourism, as the area's attractions, beauty, and uses diminish. Along with the current reduction in property values, this could create an additional reduction of part time vacationers seeking vacation homes, adding to the reduction in amount of taxable value, equating to compounded lost revenue for the county/city.

In conclusion

I am the third generation that has owned, lived on, and enjoyed this land, my children are the forth. Additionally my neighbors have their fourth generation enjoying the beauty and peacefulness of their land. It is heart wrenching to think of the impact these proposed transmission lines will have on the area. I am also worried how these power lines will affect my communications and shortwave radio equipment as I am an avid enthusiast.

Thank you for your willingness and patience to consider comments,

Particularly letters as long as this.

Sincerely

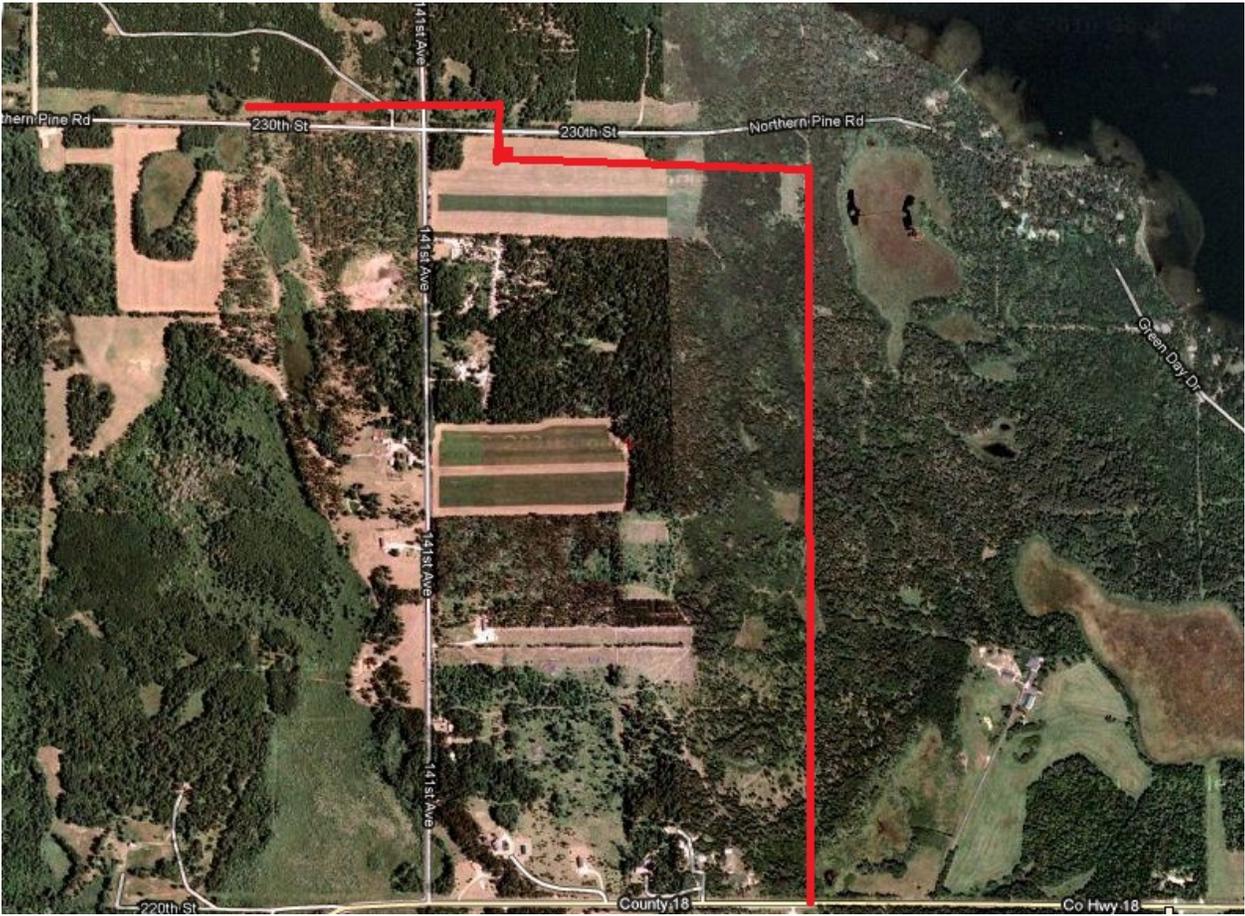
Cory Miller.

Could you *please* reply to me to acknowledge receipt of this e-mail?

If I can clarify or for any additional input I may help with please call me anytime at:

218-366-0422 (this rings both my home, and cell phone)

Or e-mail me @ [wolvenar@wolvenar.com](mailto:wolvenar@wolvenar.com) or reply to this message.



(Your name) Sheila Moe  
(Your address) 22344 County 80  
Nevis, MN 56463  
(Date) May 12, 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 am in favor of locating Great River Energy's 115 kV transmission line along the northern alternative route located west of Emmaville from CSAH 4 to Highway 71. If the substation were to also be located at this vicinity, it would be a preferred site for future growth needs.

This route is made up of primarily county and state land, affecting as few private properties as possible while preserving the aesthetics of our lake sensitive region and tourism industry.

Thank you for your consideration.

(Name/signature)

Sheila Moe

## Ek, Scott (COMM)

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**From:** Melodee Monicken [mmonicken@gmail.com]  
**Sent:** Tuesday, June 01, 2010 1:27 PM  
**To:** Ek, Scott (COMM)  
**Subject:** Re: Potato Lake

Mr. Ek,

After studying the possible and alternate routes, I am in favor of Great River Energy's route permit application--the one that requests a route which goes south on Hubbard County Road 4, then west on County Highway 18. Other routes seem more environmentally destructive. This is the best route, particularly with the portion that will be underground.

Thank you for your consideration of my comment.

Melodee Monicken

June 1, 2010



**Via Electronic Filing**

Dr. Burl W. Haar  
Minnesota Public Utilities Commission  
121 Seventh Place East, Suite 350  
St. Paul, MN 55101-2147

Re: In the Matter of the Route Permit Application by Great River Energy for its Potato Lake 115 kV Substation and High Voltage Transmission Line  
MPUC Docket No. ET2/TL-10-86

Dear Dr. Haar:

Enclosed by e-filing is a copy of Great River Energy's Comments on Scope of Environmental Assessment in connection with the above entitled Docket. Also enclosed is an Affidavit of Service.

Sincerely,

Dan Lipschultz  
Attorney At Law  
612-877-5306  
LipschultzD@moss-barnett.com

DL/cm  
Enclosures  
cc: All parties of record

1604580v1

**STATE OF MINNESOTA  
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

David Boyd  
J. Dennis O'Brien  
Thomas Pugh  
Phyllis Reha  
Betsy Wergin

Chair  
Commissioner  
Commissioner  
Commissioner  
Commissioner

In the Matter of the Route Permit Application by  
Great River Energy for its Potato Lake 115 kV  
Substation and High Voltage Transmission Line

MPUC Docket No. ET2/TL-10-86

**GREAT RIVER ENERGY COMMENTS ON  
SCOPE OF ENVIRONMENTAL ASSESSMENT**

**INTRODUCTION**

Pursuant to Minnesota Rules, part 7850.3700, Great River Energy respectfully submits these comments regarding the scope of the Environmental Assessment ("EA") for the proposed Potato Lake 115 kV substation and transmission line ("Potato Lake Project" or "Project").

Great River Energy filed a Route Permit Application for the Potato Lake Project on February 26, 2010 ("Application"). The Public Utilities Commission ("Commission") subsequently issued its Order accepting Great River Energy's Application on April 16, 2010 ("Order"). As a project subject to the alternative permitting process in Minnesota Rules, parts 7850.2800 to 7850.3900, the Potato Lake Project requires an EA prepared by the Minnesota Office of Energy Security ("OES"). Before preparing the EA, the OES must first determine its scope under the scoping process set forth in the Commission's rules. As required by Minnesota Rules, part 7850.3700, the OES held a public meeting on May 18, 2010 to allow public participation in the development of the scope ("Scoping Meeting"). Representatives of Great River Energy attended the Scoping Meeting and listened to the range of concerns and questions raised by residents.

Great River Energy takes very seriously both the concerns expressed at that meeting and its obligation to its members to ensure safe, reliable electric power. Great River Energy also recognizes the importance of the EA in evaluating Great River Energy's proposed route for the Project. These comments are not intended to address each and every issue raised at the Scoping Meeting, but are instead submitted to address and clarify two general matters discussed on May 18, 2010 as they relate to the scope of the EA: (1) the need for the Project; and (2) the viability of the alternative route suggested by the Advisory Task Force ("ATF").

## DISCUSSION

### I. PROJECT NEED.

#### A. NEED CANNOT BE PART OF THE EA

While Great River Energy understands and appreciates the interest expressed by many in exploring the need for the Project, the Commission made it clear in its Order accepting the Application that need cannot be part of the EA. As the Commission stated:

First, as to the subjects identified in the first two bulleted items (*a no-build option* and issues related to *project need*, size, type or timing of the project), the Commission agrees with the OES that these subjects *cannot be part of* the OES's environmental review.<sup>1</sup>  
(Emphasis added).

The Commission's clear direction to exclude need from consideration reflects the legislative mandate to exclude need from an EA. Specifically regarding site and route selection, Minnesota Statutes, Section 216E.02, subd. 2, provides that:

*Questions of need*, including size, type and timing; alternative system configurations; and voltage *must not be included* in the scope of the environmental review conducted under this chapter.<sup>2</sup> (Emphasis added).

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<sup>1</sup> Order at p. 6.

<sup>2</sup> Minn. Stat. § 216E.02, subd. 2.

This statutory mandate to exclude need from consideration in an EA is neither uncertain nor ambiguous. There are no exceptions, qualifications or caveats. An EA is intended to “describe the human and environmental impacts of a proposed large electric power generating plant or high voltage transmission line ... and methods to mitigate such impacts.”<sup>3</sup> To the extent there are alternative routes or sites, then the EA may address the environmental impacts of those routes or sites as well. However, the purpose or scope of an EA simply does not include the issue of need.

## **B. THE PROJECT IS NEEDED**

Although the issue of need cannot be part of the EA, Great River Energy will nevertheless address this issue generally in response to the extensive discussion at the Scoping Meeting. First, as a preliminary matter, it is important to note that the need for the Project has two components: (1) the need for a new substation as part of the Itasca-Mantrap Cooperative Electrical Association (“Itasca-Mantrap”) local distribution system serving the area; and (2) the need for a new transmission line to connect the new substation to the transmission system. Itasca-Mantrap determined the need for the new substation, thereby creating the need for a new transmission line. Second, even though need cannot be considered in the EA, residents will still have a forum for addressing need directly with Itasca-Mantrap. Specifically, Itasca-Mantrap has committed to holding a special meeting of its members to address this issue.

### **1. Need for Potato Lake Substation**

Itasca-Mantrap has proposed the new Potato Lake Substation to meet a current system need created by a more than 6 percent annual increase in electric demand in the area over the

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<sup>3</sup> Minn. Rules, part 7850.1000, subp. 7.

past seven years.<sup>4</sup> As a result of this demand growth, the local distribution system in the area, currently served by the Mantrap Substation, faces a serious risk of brownouts, voltage drops that can damage customer appliances, and outages caused by overloaded utility equipment in the Mantrap Substation.<sup>5</sup> These risks are not speculative. In fact, voltages on the system have already reached critical level outside accepted parameters.<sup>6</sup> Therefore, the need for the Project is driven by the need for the new Potato Lake Substation to meet the demand growth in the area that has already occurred.

## **2. Need for Transmission Line**

As explained in the Application, the new transmission line is needed to connect the new Potato Lake Substation to the transmission system. Great River Energy has determined that a 115 kV line is appropriate to ensure that the line can be integrated into the overall system in the area if that system is eventually converted to 115 kV in the future. Nevertheless, a transmission line would still be constructed to serve the new substation even if Great River Energy concluded that a lower voltage capacity -- 34 kV line -- was appropriate. Therefore, a “no-build” alternative is not an option because the new Potato Lake Substation will have to be connected to the transmission system. It is simply a matter of whether the line should be built at a 34 kV or 115 kV capacity.

Although the current load in the area would only require a 34 kV capacity line, long-range forecasts show a potential need to increase the overall transmission system capacity in the area to 115 kV at some point in the future, perhaps as early as five years from now, but possibly later. Transmission lines are not built to last 5 - 10 years; they are built to last 30 - 50 years. As

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<sup>4</sup> See Application, pp. 2-1 through 2-5.

<sup>5</sup> *Id.* at p. 2-3.

<sup>6</sup> Specifically, the January 2009 metered peak load at the Mantrap substation resulted in an overload condition of 130% on the 7500 kVA substation transformer.

a result, Great River Energy believes it is more appropriate to build a 115 kV line to ensure the necessary longevity and avoid the need for reconstruction of the line in the future if the surrounding system is ultimately converted to a 115 kV capacity.

The concerns expressed by residents regarding a 115 kV transmission line would likely apply to a 34 kV line. As in the case of the proposed 115 kV line, a 34 kV transmission line would consist of (i) essentially the same number of nearly identical wooden poles, only 5 - 10 feet shorter; (ii) similar wires strung from pole to pole; (iii) similar tree clearing; and (iv) essentially identical construction activity. Therefore, building a 34 kV rather than a 115 kV line would not appear to have any significant benefits for residents. To the contrary, residents might face a second round of construction to replace the 34 kV line with a 115 kV line in the event a conversion to a higher voltage capacity becomes necessary. Moreover, a 34 kV line is not subject to the route permit requirement.

**II. THE ALTERNATIVE ROUTE PROPOSED BY THE ADVISORY TASK FORCE SHOULD NOT BE INCLUDED IN THE EA.**

The ATF has proposed an alternative route (ATF Alternative) that would (i) place the proposed substation approximately 4.3 miles northwest of the proposed site; and (ii) re-route the transmission line west from the substation through approximately eight miles of currently undeveloped, undisturbed forest, and then south for approximately 4.7 miles along CSAH 4.<sup>7</sup>

While a number of residents near the proposed route spoke in favor of the ATF Alternative at the Scoping Meeting, others spoke in opposition. The ATF Alternative should be excluded from the EA as an unreasonable and impractical proposal that would fail to meet the need that the Project is intended to address.

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<sup>7</sup> See Exhibit A (Map showing ATF Route).

Great River Energy recognizes that it is appropriate for the OES to consider alternatives to the proposed route in its EA even if Great River Energy believes its proposed route is substantially better than any of those alternatives. For example, the EA could appropriately consider the alternative route along CSAH 40 that some property owners in the area had previously suggested, even though Great River Energy believes that alternative would be substantially less desirable than the proposed route for a number of reasons. The Commission expressly recognized that alternative as appropriate for the EA. Moreover, that alternative would follow existing road rights-of-way.

In contrast, the ATF Alternative fails to meet the minimum thresholds for consideration in the EA under the Commission Order and should, therefore, be excluded. The Commission Order authorizing an ATF for this Project provides that the EA will not include “[r]outes, segments or alternatives that would be unpractical or unreasonable or would not meet the stated need of the proposed project.”<sup>8</sup> The ATF Alternative discussed at the Scoping Meeting would fail to meet the stated need for the Project and, even if it did meet the need, it would be impractical and unreasonable.

**A. THE ATF ALTERNATIVE FAILS TO MEET THE STATED NEED**

Itasca-Mantrap has proposed the new substation in response to increased electric demand in the immediate vicinity of Potato Lake. The proposed site for the new substation places it where the demand growth has occurred and, therefore, meets Itasca-Mantrap’s need to ensure the reliable delivery of power to its members. The ATF Alternative would place the proposed new substation approximately 4.3 miles northwest of the proposed site. As a result, the substation

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<sup>8</sup> Commission Order at p. 5.

would not meet the need it is intended to serve, defeating the purpose of the substation.

Therefore, the ATF Alternative is not appropriate for consideration in the EA.

**B. THE ATF ALTERNATIVE CONFLICTS WITH THE STATE'S NONPROLIFERATION POLICY AND STRONG PREFERENCE FOR USING EXISTING RIGHTS-OF-WAY**

The ATF Alternative would be unreasonable inasmuch as it would conflict with Minnesota's nonproliferation policy, which calls for the use of existing rights-of-way for new transmission lines when those lines would materially impact the environment. As the Minnesota Supreme Court observed in its seminal *PEER* decision regarding the siting of transmission lines,<sup>9</sup> "the legislature explicitly expressed its commitment to the principle of nonproliferation in its 1977 revision of the PPSA [Power Plant Siting Act]," requiring the Commission to "consider the *utilization of existing railroad and highway rights-of-way ...*"<sup>10</sup> (Emphasis added).

More recently, the 2010 Legislature further emphasized the State's nonproliferation policy by amending the PPSA to require specific findings that the Commission has "considered locating a route for a high-voltage transmission line on an existing high-voltage transmission route and the *use of parallel existing highway right-of-way ...*" (Emphasis added).<sup>11</sup> To the extent the Commission chooses not to site a line along an existing highway right-of-way, the new PPSA amendment requires that the Commission "must state the reasons." Therefore, although a number of factors apply to the selection of an appropriate route for a high voltage transmission line, the legislature has clearly given special weight to the policy against the proliferation of new rights-of-way.

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<sup>9</sup> See *People for Environmental Enlightenment and Responsibility ("PEER), Inc., et al., v. Minnesota Environmental Quality Council, etc.*, 266 N.W. 2d 858 (1978) ("PEER").

<sup>10</sup> *PEER* at p. 868.

<sup>11</sup> Exhibit B (Session Laws, Minnesota 2010 Regular Session, Chapter 288).

The State's nonproliferation policy renders the ATF's suggested route an unreasonable and impractical alternative for consideration here. The ATF Alternative would require Great River Energy to establish eight miles of new right-of-way through currently undisturbed, dense forest, rather than use the existing highway rights-of-way along the proposed route. Even a high level analysis shows the substantial environmental impact associated with the ATF Alternative, which would involve construction and creation of a new right-of-way, including access roads, through approximately 90 acres of forested land and at least 12 riparian acres.<sup>12</sup> The comments of Clay Township's representative, Norman Leistikow, vividly illustrate the environmental impact associated with the ATF Alternative. In describing the impact of the ATF Alternative, Mr. Leistikow referred to the affected wildlife that "are well protected by acres and acres and miles of trees, wetlands, streams, and lakes."<sup>13</sup> Those lakes include a "number of little pothole lakes there" that may be unmapped but are nevertheless part of the natural environment that would be disturbed by the creation of a new right-of-way in that area.

This type of impact on largely undisturbed natural resources is precisely what the State's nonproliferation policy is intended to avoid. In this context, the use of an existing right-of-way becomes an imperative and not simply a factor. Great River Energy has proposed a route that follows existing highway rights-of-way. And while departures from existing rights-of-way may be appropriate for limited segments to help avoid or mitigate certain unwanted impacts, the ATF's proposal to build the transmission line through nearly eight miles of undeveloped forested land, far from any existing right-of-way, cannot be considered a reasonable alternative.

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<sup>12</sup> Exhibit C.

<sup>13</sup> Transcript of Public Comments, Scoping Meeting (May 18, 2010) (Scoping Meeting Transcript), p. 27.

**C. THE ATF ALTERNATIVE COULD CREATE SIGNIFICANT MAINTENANCE AND REPAIR PROBLEMS**

In addition to conflicting with the State's nonproliferation policy, the ATF Alternative would also be impractical from a maintenance and repair standpoint. Locating the line through eight miles of largely undeveloped terrain without existing rights-of-way would potentially present serious maintenance and repair issues. As Mr. Leistikow noted, the ATF Alternative would require the construction of access roads needed to maintain and repair the line. In addition to the environmental impact of building new access roads, the need to create access where no such access exists foreshadows significant maintenance and repair issues potentially associated with the ATF Alternative. As Mr. Leistikow indicated, the terrain in that area includes swampland that has stranded multiple vehicles attempting to travel there.<sup>14</sup>

In Great River Energy's experience, locating a line in a heavily forested area without an existing road right-of-way complicates maintenance and can seriously impede its ability to make timely repairs. The need to repair a line rarely arises in ideal circumstances. Instead, the need for repairs typically arises in rain, snow and ice storms -- events that can make difficult terrain more difficult to access and potentially impassable. At a minimum, the repair and maintenance of line that is not built along a major existing road right-of-way will tend to be less timely and more difficult. Given the heavily forested, wetland areas identified on the area map and described by Mr. Leistikow, the ATF Alternative would likely present maintenance and repair challenges that render the alternative an impractical one and not appropriate for consideration in the EA.

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<sup>14</sup> Scoping Meeting Transcript, pp. 27-30.

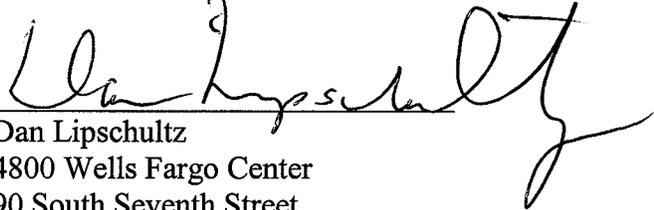
**CONCLUSION**

As discussed herein, State law and the Commission Order preclude consideration of need in the EA. In addition, Great River Energy recommends that the OES exclude the ATF Alternative from the EA as an impractical and unreasonable alternative that fails to meet the stated need for the Project consistent with the Commission Order. To the extent that the OES concludes that the ATF Alternative should nonetheless be included in the EA, Great River Energy urges the OES to incorporate the State's nonproliferation policy regarding new rights-of-way into its analysis.

Dated: June 1, 2010

Respectfully submitted,

MOSS & BARNETT  
A Professional Association



Dan Lipschultz  
4800 Wells Fargo Center  
90 South Seventh Street  
Minneapolis, Minnesota 55402  
Telephone: 612-887-5306

Attorneys on Behalf of Great River Energy

**EXHIBIT A**



**GREAT RIVER ENERGY**  
A Touchstone Energy Cooperative

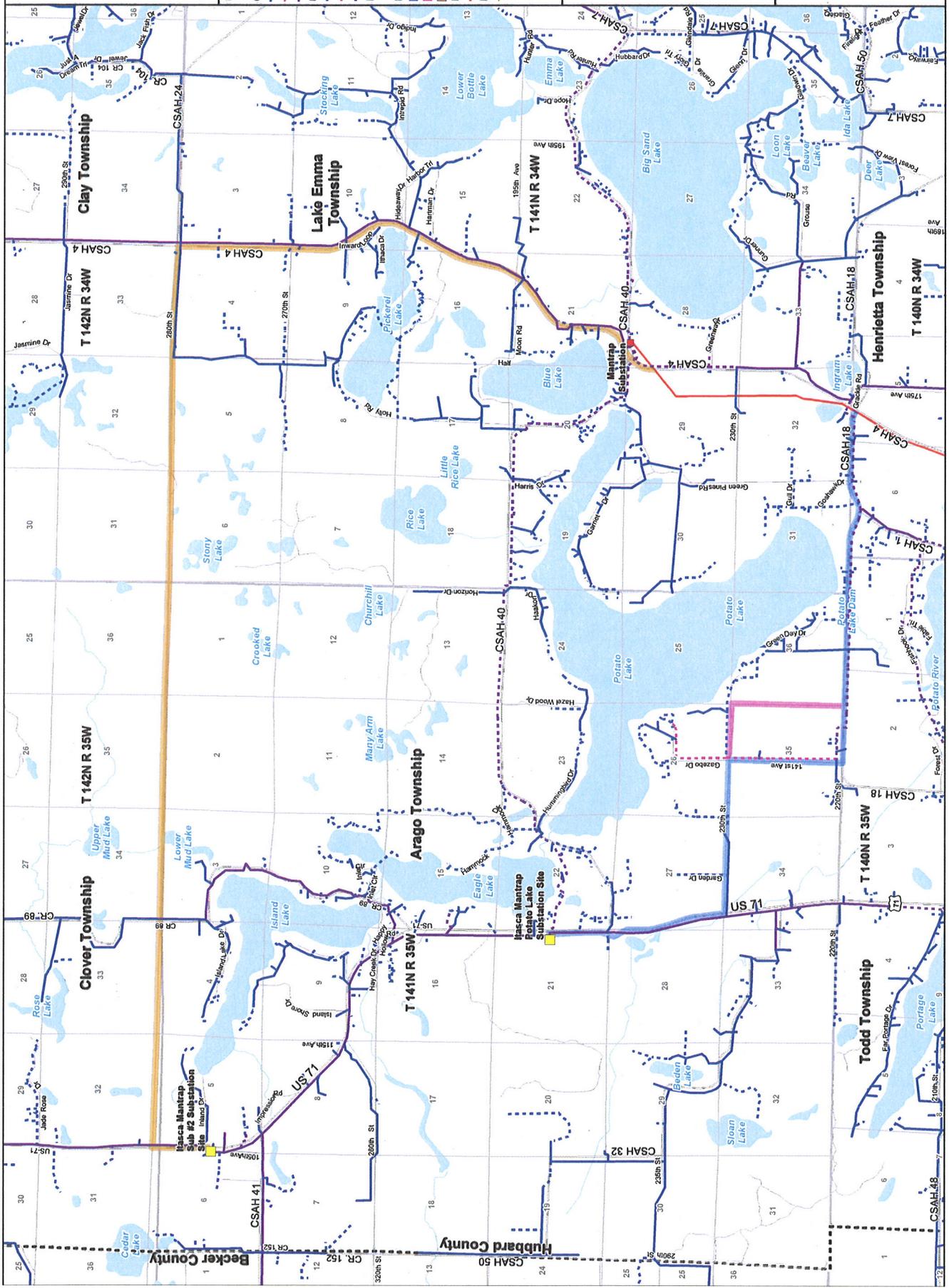
- Proposed Itasca-Mantrap (IM)
- Overhead Distribution
- Single Phase Line
- V Phase Line
- Three Phase Line
- Underground Distribution
- Single Phase Line
- V Phase Line
- Three Phase Line
- Existing Itasca-Mantrap
- Distribution Substation
- Proposed Great River Energy (GRE)
- Proposed 115 kV Transmission Line Route
- Alternate Route
- Existing Great River Energy
- ATF Route Segment 1
- Existing Minnesota Power (MP)
- Existing 34.5 kV Transmission Line
- Existing 34.5 kV Transmission Line



Updated: May 28, 2010  
0 2,000 4,000 Feet

Data Sources Vary Between MNDOT, MNDNR, MINGEO and Great River Energy  
Distribution data from Itasca-Mantrap Cooperative Electrical Association  
Map Projection: UTM, NAD83, Zone 15, Meters

**Potato Lake  
115 kV Transmission  
Line & Substation  
Project:**  
**Distribution Lines**



**EXHIBIT B**

# Minnesota Session Laws

Search

Key: (1) ~~language to be deleted~~ (2) new language

## 2010, Regular Session

This document represents the act as presented to the governor. The version passed by the legislature is the final engrossment. It does not represent the official 2010 session law, which will be available here summer 2010.

### CHAPTER 288--H.F.No. 1182

An act

relating to eminent domain; clarifying use of eminent domain authority by public service corporations; regulating the granting of route permits for high-voltage transmission lines; requiring a report; amending Minnesota Statutes 2008, sections 117.225; 216E.03, subdivision 7; Minnesota Statutes 2009 Supplement, section 117.189.

BE IT ENACTED BY THE LEGISLATURE OF THE STATE OF MINNESOTA:

Section 1. Minnesota Statutes 2009 Supplement, section 117.189, is amended to read:  
**117.189 PUBLIC SERVICE CORPORATION EXCEPTIONS.**

Sections 117.031; 117.036; 117.055, subdivision 2, paragraph (b); 117.186; 117.187; 117.188; and 117.52, subdivisions 1a and 4, do not apply to the use of eminent domain authority by public service corporations for any purpose other than construction or expansion of:

(1) a high-voltage transmission line of 100 kilovolts or more, or ancillary substations; or

(2) a natural gas, petroleum, or petroleum products pipeline, or ancillary compressor stations or pumping stations.

For purposes of an award of appraisal fees under section 117.085, the fees awarded may not exceed \$1,500 for all types of property except for a public service corporation's use of eminent domain for a high-voltage transmission line, where the award may not exceed \$3,000.

For purposes of this section, "pipeline" does not include a natural gas distribution line transporting gas to an end user.

**EFFECTIVE DATE.** This section is effective the day following final enactment and applies to eminent domain proceedings or actions commenced on or after that date. "Commenced" means when service of notice of the petition under Minnesota Statutes, section 117.055, is made.

Sec. 2. Minnesota Statutes 2008, section 117.225, is amended to read:  
**117.225 EASEMENT DISCHARGE.**

Whenever claiming that an easement acquired by condemnation is not being used for the purposes for which it was acquired, the underlying fee owner may apply to the district court of the county in which the land is situated for an order discharging the easement,

upon such terms as are just and equitable. Due notice of said application shall be given to all interested parties. Provided, however, this section shall not apply to easements acquired by condemnation by a public service corporation now or hereafter doing business in the state of Minnesota for any purpose other than construction or expansion of:

(1) a high-voltage transmission line of 100 kilovolts or more, including ancillary substations; or

(2) a natural gas, petroleum, or petroleum products pipeline, including ancillary compressor stations or pumping stations.

For purposes of this section, "pipeline" does not include a natural gas distribution line transporting gas to an end user.

**EFFECTIVE DATE.** This section is effective the day following final enactment and applies to eminent domain proceedings or actions commenced on or after that date. "Commenced" means when service of notice of the petition under Minnesota Statutes, section 117.055, is made.

Sec. 3. Minnesota Statutes 2008, section 216E.03, subdivision 7, is amended to read:

Subd. 7. **Considerations in designating sites and routes.** (a) The commission's site and route permit determinations must be guided by the state's goals to conserve resources, minimize environmental impacts, minimize human settlement and other land use conflicts, and ensure the state's electric energy security through efficient, cost-effective power supply and electric transmission infrastructure.

(b) To facilitate the study, research, evaluation, and designation of sites and routes, the commission shall be guided by, but not limited to, the following considerations:

(1) evaluation of research and investigations relating to the effects on land, water and air resources of large electric power generating plants and high-voltage transmission lines and the effects of water and air discharges and electric and magnetic fields resulting from such facilities on public health and welfare, vegetation, animals, materials and aesthetic values, including baseline studies, predictive modeling, and evaluation of new or improved methods for minimizing adverse impacts of water and air discharges and other matters pertaining to the effects of power plants on the water and air environment;

(2) environmental evaluation of sites and routes proposed for future development and expansion and their relationship to the land, water, air and human resources of the state;

(3) evaluation of the effects of new electric power generation and transmission technologies and systems related to power plants designed to minimize adverse environmental effects;

(4) evaluation of the potential for beneficial uses of waste energy from proposed large electric power generating plants;

(5) analysis of the direct and indirect economic impact of proposed sites and routes including, but not limited to, productive agricultural land lost or impaired;

(6) evaluation of adverse direct and indirect environmental effects that cannot be avoided should the proposed site and route be accepted;

(7) evaluation of alternatives to the applicant's proposed site or route proposed pursuant to subdivisions 1 and 2;

(8) evaluation of potential routes that would use or parallel existing railroad and highway rights-of-way;

(9) evaluation of governmental survey lines and other natural division lines of agricultural land so as to minimize interference with agricultural operations;

(10) evaluation of the future needs for additional high-voltage transmission lines in the same general area as any proposed route, and the advisability of ordering the construction of structures capable of expansion in transmission capacity through multiple circuiting or design modifications;

(11) evaluation of irreversible and irretrievable commitments of resources should the proposed site or route be approved; and

(12) when appropriate, consideration of problems raised by other state and federal agencies and local entities.

(c) If the commission's rules are substantially similar to existing regulations of a federal agency to which the utility in the state is subject, the federal regulations must be applied by the commission.

(d) No site or route shall be designated which violates state agency rules.

(e) The commission must make specific findings that it has considered locating a route for a high-voltage transmission line on an existing high-voltage transmission route and the use of parallel existing highway right-of-way and, to the extent those are not used for the route, the commission must state the reasons.

**EFFECTIVE DATE.** This section is effective the day following final enactment and applies to route applications filed on and after that date.

#### Sec. 4. **TRANSMISSION LINE ROUTING.**

(a) The Public Utilities Commission and the commissioner of transportation must cooperate to implement the policy in Minnesota Statutes, section 216E.03, subdivision 7, paragraph (e).

(b) The commission must report any statutory amendments required for the implementation of Minnesota Statutes, section 216E.03, subdivision 7, paragraph (e) to the chairs and ranking minority members of the energy and transportation policy committees of the legislature by January 15, 2011.

**EFFECTIVE DATE.** This section is effective the day following final enactment.

**EXHIBIT C**

Route	Total Project Costs	Number of Houses within			Number of Houses within 500 Feet from Road Centerline	Hay, Pasture, Grassland Percentage	Cultivated Percentage	Number of Water Crossings	Total Forested Acres	Total Wetland Acres	Total Riparian Acres	Closest Mileage to a Lake	Miles of Existing ROW (Road ROW, Existing Distribution Lines, etc.)
		100 Feet from Road Centerline	300 Feet from Road Centerline	500 Feet from Road Centerline									
Proposed Route (7.25 miles)	\$4,421,492	2	29	51	35.18%	1.11%	2	21 - 25	23.15	0.38	0.16	7.25	
Alternate Route (7.25 miles)	\$4,461,492	2	20	39	27.58%	0.04%	2	30 - 34	24.93	0.38	0.16	6.25	

Please note:

Some house counts were incorrect in the Route Permit Application (RPA) :  
 500 feet - 50 instead of 51 for proposed route  
 300 feet - 21 instead of 20 for alternate route

For both routes, the closest distance to the lake (Potato) was re-calculated and it is actually .08 miles.

Rare features were not added to the table because both routes have the same features.

The total cleared right of way acreage was not mentioned in the RPA - the acreages are 48.23 for proposed and 54.45 for the alternate (this does not include the road surfaces).

Route	Total Project Costs	Number of Houses within			Number of Houses within 500 Feet from Centerline	Hay, Pasture, Grassland Percentage	Cultivated Percentage	Number of Water Crossings	Total Forested Acres	Total Wetland Acres	Total Riparian Acres	Closest Mileage to a Lake	Miles of Existing ROW (Road ROW, Existing Distribution Lines, etc.)
		100 Feet from Centerline	300 Feet from Centerline	500 Feet from Centerline									
ATF Route (13.2 miles)	\$10,703,890	3	31	42	16.98%	6.32%	3	90.57	18.19	11.99	0	7.23	

**Proposed Route with Proposed Substation**

Task	Pre Const	Const	Post Const
Planning	\$165,393		\$30,433
Design	\$134,633	\$2,501,534 Const + Ease	\$165,000 Restoration
Tree Clearing	\$200,000		
Engineering			
SW	\$18,251	\$116,248	
Meter	\$10,000	\$50,000	
Dist Underbuild		\$180,000	
Dist Deconstruct			\$195,433
	\$528,277	\$2,847,782	
		\$3,571,492	
		<b>\$4,421,492 with Substation Cost</b>	

**\$850,000 Substation Cost**

7.25 Route miles  
23 Acres forested

2 Unbuild miles - 2 miles 3 phase

Note: Additional \$40,000 was added to the Alternate route for additional Tree Trimming

**ATF Route with ATF Substation**

Task	Pre Const	Const	Post Const
Planning	\$427,000		\$30,433
Design	\$134,633	\$6,705,600 Const + Ease	\$303,600 Restoration
Tree Clearing	\$787,565		
Engineering		\$670,560	
SW	\$18,251	\$116,248	
Meter	\$10,000	\$50,000	
Dist Underbuild		\$400,000	
Dist Deconstruct		\$200,000	\$334,033
	\$1,377,449	\$8,142,408	
		\$9,853,890	
		<b>\$10,703,890 with Substation Cost</b>	

13.2 Route miles  
90.57 Acres forested

5 Unbuild miles - 4 miles 3 phase, 1 mile 1 phase.

Note: Additional Planning Costs due to CON process.

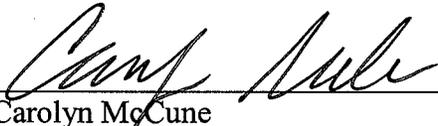
**AFFIDAVIT OF SERVICE**

STATE OF MINNESOTA    )  
                                  )ss.  
COUNTY OF HENNEPIN    )

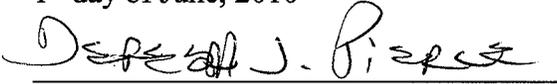
In the Matter of the Route Permit Application by  
Great River Energy for its Potato Lake 115 kV  
Substation and High Voltage Transmission Line

MPUC Docket No. ET2/TL-10-86

Carolyn McCune, being first duly sworn on oath, deposes and states that on the 1<sup>st</sup> day of June, 2010, a copy of Great River Energy's Comments on Scope of Environmental Assessment in the above-referenced matter were electronically or mailed by United States first class mail, postage prepaid thereon, as designated on the Official Service List on file with the Minnesota Public Utilities Commission.

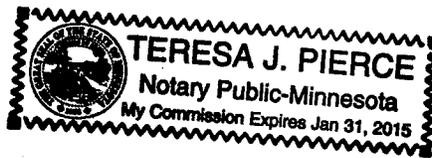
  
\_\_\_\_\_  
Carolyn McCune

SWORN TO BEFORE ME this  
1<sup>st</sup> day of June, 2010

  
\_\_\_\_\_

NOTARY PUBLIC

1604574v1



Tay Odor  
15694 Explorer Circle  
Park Rapids, MN 56470

March 15, 2010

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

Re: PUC Docket TL-10-86, proposed transmission line by Great River Energy, CSAH 18, Park Rapids

Dear Public Utilities Board,

I am writing on behalf of my parents, M.L. and B.J. Schield, in reference to the Potato Lake 115 KV Substation and Transmission Line that Great River Energy is proposing along County Road 18 in Hubbard County. They live on County Road 18 and the proposed power lines will have a significant impact on their property value and the beauty of their property. They have worked hard their whole lives in underground construction, raised 8 children and live a simple, non-extravagant life. The river home they live in on County Road 18 is the last home they will own and when the time comes for them to move into assisted living or a nursing home, the monetary value they gain from their home will, in large part, determine the level of care they can afford.

The proposed power lines could take between 60 to 100 feet of an easement on their property. The easement will greatly impact the value of their property since it will strip a good portion of the trees reducing the beauty of their property. They had potential plans of a second lot where one of their children could build and live close at hand so they can stay in their home as long as possible. The easement will take too much of the second lot preventing them from using it for that purpose. Beyond those issues, the reduced tree coverage will expose their home to the elements likely causing higher fuel bills to heat and cool their home. The financial burden for our parents alone will be more than what can be asked for the common good. But they aren't the only ones that will be adversely affected by the proposed route.

The entire neighborhood stands to lose significant property value. One of the reasons these people have chosen to live here is because of the beautiful north woods. The power lines would strip the whole of County 18 of its beauty replacing it with high voltage power lines and barren land. All of which will cause the residents to lose property value and own land which is useless to them.

Residents have asked them to consider underground lines, going through the woods rather than along their road and considering another route to the north of Potato Lake which is shorter. Great River is reluctant to consider these options because they believe those routes are more cost prohibitive. My

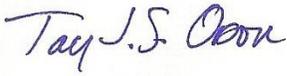
question is cost prohibitive to whom? Please do not allow this company to build their profit off the backs of honest working folks, many of whom do not have the time in life to recoup the kind of loss they will incur by this.

Great River has indicated the installation of this power line is for the common good. However, the current residents do not stand to gain anything by this power line and the current need for this power line is questionable. Great Rivers and Itasca-Mantrap Electric stand to gain greatly by adding this power line as it will position them to be the electric company available for any growth into the area north of Park Rapids.

I ask that you investigate whether this power line is truly needed and if so, I ask that another route with less impact to the residents and the environment be considered. Please hold Great River Energy to the highest standard when dealing with land owners and do not allow them to gain their profits off the back of honest, law-abiding elderly citizens.

Thank you for your time and your consideration.

Sincerely,

A handwritten signature in blue ink that reads "Tay J. S. Odor". The signature is written in a cursive style with a clear first and last name and a middle initial.

Tay Odor

218-237-3605

tayandlarry@unitelc.com

Tay Odor  
15694 Explorer Circle  
Park Rapids, MN 56470

5/8/10

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 am in favor of locating Great River Energy's 115 kV transmission line along the northern alternative route located west of Emmaville from CSAH 4 to Highway 71. If the substation were to also be located at this vicinity, it would be a preferred site for future growth needs.

This route is made up of primarily county and state land, affecting as few private properties as possible while preserving the aesthetics of our lake sensitive region and tourism industry.

Thank you for your consideration.

A handwritten signature in blue ink that reads "Tay J. S. Odor". The signature is written in a cursive, flowing style.

Tay Odor  
Park Rapids Resident

Josiah Odor (and Tay Odor)  
15694 Explorer Circle  
Park Rapids, MN 56470

March 23, 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:

Josiah Odor is the seven year old grandson of Merwin and Berneva Schield who live on CSAH 18 in Park Rapids, MN. Josiah and his brother, Jordan (4 yrs old), have the rare opportunity to grow up enjoying and playing in the beauty and wonder of nature in the woods at Grandma and Grandpa's house. It is there that they enjoy running through the leaves and the trees without care. It is there that they have watched the reaction of the ducks to the sudden appearance of a mink along the shore. It is there they have heard the slap of a beaver's tail against the water. It is there that they have witnessed more than 35 Trumpeter Swans floating and interacting in the river at one time. It is there that they have learned the beauty and the fragility of creation. And it is there that they have their "fort" in the woods where their imaginations run wild as their hearts run free.

Author, child advocate and columnist, Richard Louv, in his ground-breaking work, "Last Child in the Woods," directly links the absence of nature in the lives of today's wired generation to some of the most disturbing childhood trends including the rise of obesity, attention disorders and depression. Luckily, for Josiah and Jordan, because they have Grandparents who have chosen to live in God's great outdoors, they have not known those kinds of deficits due to a lack of interaction with nature.

Both Josiah and Jordan have expressed heartfelt concern over the power lines that could strip some of their woods away and potentially hurt the wildlife they love. Today Josiah asked if he could write a letter to you to help you understand his concerns. That letter is attached. Thank you for your consideration.

On Josiah, Jordan and Merwin and Berneva Schield's behalf,

Tay Odor

To the P.U.C.,

Please find a  
different route so  
my fort isn't ruined.

Josiah Odon  
(7 yrs. old)

Tay Odor  
15694 Explorer Circle  
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:

As a concerned citizen of Park Rapids, I request a Citizen Advisory Task Force for the TL10-86 proposed transmission line project. This project has a significant potential impact on County Road 18 property owners, their families, their investments, the wildlife and the environment. It also has the potential to significantly impact the beauty of our area. I kindly ask you to assign a Citizen Advisory Task Force so we have the opportunity to participate in the conversations about this project.

I also ask for the opportunity to address the PUC at the March 25th meeting at 9:30 a.m. on behalf of the property owners along CSAH 18.

Sincerely,

Tay Odor  
218-237-3605

Dave and Cindy Peckat  
9940 260<sup>th</sup> St.  
Park Rapids, MN 56470

May 11, 2010  
Minnesota Public Utilities Commission  
121 7th Place E. Suite 350  
St. Paul, MN 55101-2147  
Docket TL-10-86

Attention Commission Members:

We are writing to you in regards of Docket #TL-10-86. It has been brought to our attention that Great River Energy wants to run a High Voltage Transmission Line down county rd 18. This proposed line will run past our daughter and son in-laws home (Jamie and Holly Krautkremer). It will destroy the value of their property, also the beauty and privacy of their home as well. As concerned parents not only are we concerned about the hardship finically this will place upon them we are also concerned about what health effects this will also have upon them. If this line is run by their home, these treated poles will be within 40 feet of their drinking well. The treatments used on these poles can and have caused cancer and other health issues. We plead with the commission members to please find an alternative route that will not harm and affect less people.

Thank you for your time and help in regards to this matter.

Concerned Parents of Jamie and Holly Krautkremer,  
Dave and Cindy Peckat

(Your name) Jerry Pederson  
(Your address) 14279 Hummingbird Dr.  
Park Rapids MN, 56470  
(Date) 4/15/10

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

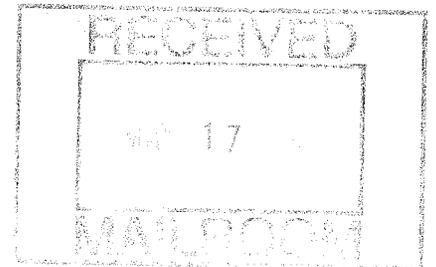
Dear Mr. Ek:

I am in favor of locating Great River Energy's 115 kV transmission line along the northern alternative route located west of Emmaville from CSAH 4 to Highway 71. If the substation were to also be located at this vicinity, it would be a preferred site for future growth needs.

This route is made up of primarily county and state land, affecting as few private properties as possible while preserving the aesthetics of our lake sensitive region and tourism industry.

Thank you for your consideration.

(Name/signature) Jerry Pederson  
Margaret Pederson



**Bill Persinger  
905 Quail Hollow Circle  
Dakota Dunes, SD 57049**

May 31, 2010

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

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

Commissioners:

My wife and I are property owners along County 18 in Park Rapids. The proposed transmission line will go over a significant amount of our property. We are writing today to encourage you to use an alternate route and to bury the proposed transmission line wherever it is routed. The charm of the lake country is its beautiful scenery. This draws tourists to the area which is a key ingredient of the local economy. We are concerned that the proposed transmission line will ruin the aesthetics of the area thereby impacting tourism and the value of our property. Please take a long term view and do not allow an ugly transmission line ruin the beautiful lake country.

Thank You

Bill & Lynn Persinger

**Ek, Scott (COMM)**

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**From:** Chad Peterson [chady100@hotmail.com]  
**Sent:** Tuesday, May 11, 2010 8:18 AM  
**To:** Ek, Scott (COMM)  
**Subject:** Help Save our Property from TL-10-86

To whom it may concern,

I have just learned of "TL-10-86," the proposed power line rout that will absolutely **decimate** the property value/natural beauty of many of the Lake homes in Hubbard County MN. As a Minnesota tax payer and a person who stands to inherit my parents lake home on Potato Lake (county Rd. 18) I strongly urge you to help change the rout of these lines that will leave a scar through individuals private property thus dropping property value.

There is an alternative rout that will affect **NO ONE**, #4 to Hwy 71 going west from Emmaville, MN. This path takes the lines out of the lakes and lake homes area altogether. Please help stand up for interests of the citizens of MN in Hubbard County whose lives will be affected by these power lines (TL-10-86). Thank you.

Chad Peterson

15610 County Road 18  
Park Rapids MN

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The New Busy is not the too busy. Combine all your e-mail accounts with Hotmail. [Get busy.](#)

**Ek, Scott (COMM)**

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**From:** Tom Peterson [tdpete75@hotmail.com]  
**Sent:** Monday, May 10, 2010 9:25 PM  
**To:** Ek, Scott (COMM)  
**Subject:** Comments Regarding TL-10-86

Dear Scott--

First of all, I would like to be included on the OES emailing list to receive information regarding TL-10-86.

I do have some comments regarding the proposed routing of the high power line in TL-10-86. I'm having trouble comprehending the decision to adversely affect so many people and the property values along the proposed route of the high voltage power line along Hwy 40 and Hwy 18. Any lake property, especially along Potato Lake on the south side, has significant property value which will be greatly decreased should this power line pass over the top of them. For some of the older folks who have lived on Hwy 18 near Potato Lake almost all of their adult lives, this is the only valuable asset they have. The other property owners have put in considerable resources and work to enhance their property and ensure the its market value remains high. Our property at 15610 County Rd 18 on Potato Lake is no exception. It appears to be a very callous, lowest cost regardless of the consequences solution.

This is particularly troubling when there is an alternative route which will have extremely low impact on personal property. This route, although slightly longer, is across undeveloped land from #4 to Hwy 71 going west from Emmaville, MN. Most of the land is county or state owned as I understand it. To disturb the pristine landscape of Hwy 18 would be unacceptable and extremely un-Minnesotan.

The small additional cost would be covered by all the users, only for a few more months than originally planned--just as we property owners have helped finance other projects for other users.

For myself and my family, this proposed route along Hwy 40 and Hwy 18 is absolutely unacceptable. The negative impact on us is immense. This is especially true since there is a viable alternative route. My serious question is this (and I doubt I would get an honest answer) -- For those voters on the board, if they owned property on the lake or anywhere along this proposed route, would they vote the same way to intentionally diminish the value of their own property?

Please enter this email into any official file regarding TL-10-86.

Sincerely,

Tom Peterson

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The New Busy is not the too busy. Combine all your e-mail accounts with Hotmail. [Get busy.](#)

# Comment Form



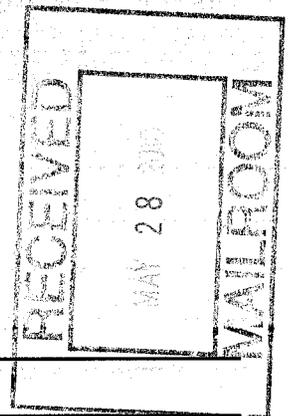
## Public Information and Scoping Meeting Comment Form

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

We need your input. Please take a few minutes to provide your comments or questions for the Minnesota Public Utilities Commission high-voltage transmission line routing and environmental review process. You are welcome to use this form or your own correspondence.

**Please check the following issues that are important to you for the siting of this proposed transmission line project.**

- Project Purpose *Need?*
- Visual and Aesthetics *Towers and line too big for our small area.*
- Proximity to Residences/Businesses *Too close to our house!*
- Land Use (zoning and future planning)
- Public Health and Safety (EMF, stray voltage, implantable devices) *Major worries about health and safety issues!*
- Interference (radio, television, satellite, GPS)
- Water Resource (lakes, rivers, wetlands, groundwater, floodplains)
- Biological Resources (flora, fauna, habitat)
- Endangered/Threatened Resources
- Historic and Cultural Sites
- Noise *once again too close to our house.*
- Recreational Resources
- Other – Please explain: \_\_\_\_\_



**Please expand upon or provide more specifics with respect to the issues you checked above.**

*Our home sits only 200' off of 141st Avenue, this is way too close for health and safety issues! Also noise.*  
*There are 6 other homes along 141st Ave and they to all have short driveways like we do. None of us want this line to come through!*

Continued on reverse side

# Comment Form



**Reasonable alternative routes, route segments or alignments.** If the proposed route is not your preferred route, please suggest reasonable route/segment/construction alternatives that may be included in the scoping decision document and evaluated in the environmental assessment.

We suggest that the North Emmeroville route be taken as it would impact a lot less families, or not to build it at all.

**Additional information and comments.** Please identify relevant site-specific information for the environmental analysis. In your opinion, what are the most sensitive resources (biological, historical, recreational, land/water, etc.) in the project area and why? *Additional space is provided on the last page of this form.*

# Comment Form



**Additional information and comments.** Please identify relevant site-specific information for the environmental analysis along the proposed and alternative routes. In your opinion, what are the most sensitive resources (biological, historical, recreational, land/water, etc.) in the project area and why? *Additional space is provided on the back of this sheet.*

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**THANK YOU FOR TAKING THE TIME TO PARTICIPATE.**  
**Please submit comments by the following means:**

- Leave this form at the meeting tonight.
- Mail, email or fax the form or a letter to the following address:

Scott Ek  
Office of Energy Security, Energy Facility Permitting  
85 7<sup>th</sup> Place East, Suite 500 | St. Paul, MN | 55115  
Email: [scott.ek@state.mn.us](mailto:scott.ek@state.mn.us) | Facsimile: 651-297-7891

- Electronically at: <http://energyfacilities.puc.state.mn.us/publicComments.html>

**PLEASE SUBMIT YOUR COMMENTS BY 4:30PM, TUESDAY, JUNE 1, 2010**

NAME: Victor & Kathy Pickett

REPRESENTING (Optional): \_\_\_\_\_

ADDRESS: 22854 141<sup>st</sup> Ave

CITY: Park Rapids STATE: MN ZIP: 56470

EMAIL: \_\_\_\_\_

Completing this form will automatically add you to our project mailing list. If you prefer to not be on the mailing list, please check the box below.

I do not wish to be on the project mailing list.

Visit <http://energyfacilities.puc.state.mn.us/Docket.html?Id=26124> for more information.

Dorothy P. Platz  
15576 County 18  
Park Rapids, MN 56470

March 23, 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:

My husband, Tony, and I will not be able to attend your meeting with Great River Energy on March 25. However, we want to stress the importance of how decisions regarding the proposed Potato Lake transmission line route will affect our neighborhood and Park Rapids at large.

Park Rapids with its many lakes has been a popular tourist area for many years and the reason many of us have chosen it for our home. The proposed route for this transmission line will greatly change the beautiful area surrounding Potato Lake...the change in foliage along County 18, wildlife in our wooded area, fowl in the river/lake.

We feel there must be alternate ways to solve the need for additional transmission lines and ask that an Advisory Task Force be established to address the situation.

Thank you for listening to our concern.

Dorothy Platz  
Property owner  
218-252-8029  
218-732-8029  
tdplatz@wcta.net

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



Commissioner

This letter is to comment on PUC Docket # TL-10-86 (Great River proposed line, Park Rapids, MN). Let me go on record opposed the County Road 18 proposed site for a high-voltage transmission line. It will ruin the natural beauty of this country road. It will also affect many cabin owners on the south shores of Potato Lake, Hubbard County. Other less intrusive routes on the north end of the lake are available to the utility company. Actually and better route would be a direct line through the woods from the new transfer station on US Highway 71 North of Park Rapids, MN.

Their proposed route will affect at least 11 of my neighbors who own shoreline along this route. Several of us already are faced with nonconforming lake lots and now will have more land taken from us through easements forced upon us. Once again undesirable development along Minnesota lake shore will be permitted if Great River is given permission to proceed. This is all in the name of big business and what best suites them verses the little person like me. It is my homesteaded piece of property that I have invested over \$500,000 in. This transmission line easement on my property will only decrease its value. When home prices are already falling I don't need this added financial burden placed upon me and my family. I am retired and on a fixed income as a senior citizen.

It was interesting that Great River waited until many of us had left our lake homes for the season then notified us through the mail that this line was being proposed and a meeting would be held to address our concerns. Some of us live in Florida, Iowa, Nebraska, and other far away places off season making it impossible to attend this informational meeting. I for one did not receive the letter until after the meeting had already been held. Naturally I was invited to comment after the fact when I would rather have been there in person to question and voice my thoughts.

There are other routes that can be taken that would be less destructive to the beauty of the land and would cause less devastation to property owners. Great River admitted to me in a telephone conversation they were interested in only the County Road 18 route because it was less costly—not the shortest. Great River and Itasca Mantrap Electric Cooperative need to come up with a better plan. Only your commission can make that happen!

Thank you,

Anthony and Dorothy Platz  
(Signed 3/01/2010)

**Ek, Scott (COMM)**

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**From:** Dorothy Platz [tdplatz@wcta.net]

**Sent:** Monday, May 10, 2010 9:42 PM

**To:** Ek, Scott (COMM)

**Subject:** TL-10-86

Mr. Ek Please note that I attended the task force hearing held in Park Rapids, MN, last Tuesday. Concerning the Potato Lake substation and proposed Great River Energy 115 kV transmission line. I favor locating the line along the northern alternative route located west of Emmaville from CSAH 4 to US highway 71. Because the line is to provide for future growth in that area it makes sense to locate it there. Thank you. Tony Platz (lake lot/homeowner county road 18)

May 25, 2010



MINNESOTA PUBLIC UTILITIES COMMISSION  
121—7<sup>TH</sup> PLACE EAST  
SUITE 350  
ST PAUL, MN 55101-2147

Re: Great River Energy—In the Matter of the Route Permit Application for the Potato Lake 115kV Transmission Line and Substation in Park Rapids, MN.  
Docket No. ET2/TL-10-86

Dear Commissioners:

I am writing this letter following the public informational meeting of May 18, 2010, in Park Rapids, Minnesota, regarding the above project.

At this meeting data was given regarding the issues of this proposed line. The transmission line is a corporation/cooperative proposal that is not sensitive to Premier Lakes/Wetlands/Landowners/Wildlife/Fisheries and the complete Mississippi River Watershed.

For over 30 years I have worked with the Potato Lake Association to protect this major watershed area and will continue to fight for it. I feel the applicant has not submitted sufficient relevant information regarding the route description, ENVIRONMENTAL IMPACTS and mitigation measures. This should render a complete rejection of the application in its entirety.

The proposed GRE routes affect over 50 property owners, many having a significant investment in property, homes, farms, investment acreage, resorts and other businesses. Several are over a million dollars. In a few cases taking property away from the lake home owners would make their lots nonconforming with the shore land ordinances.

I personally believe ongoing research points us to a revolution in how energy is generated, transmitted and distributed. Clean technological companies are spending millions of dollars to solve our energy issues and cutting the capital cost of solar energy (power). Developing new power, new transmitting methods and distributing energy is in the very near future.

A question remains as to whether power demand increased or decreased for Itasca Mantrap Cooperative which buys wholesale power from GRE. I believe this project can be delayed until new technologies are developed. We've seen what happens when our US Auto Industries and Banking/Financial Corporations do business as usual. I ask that Great River Energy/Itasca Mantrap Cooperative not do business as usual. Look for a better solution!

I am upset with GRE's finished project on Highway 34 East of Park Rapids. Their track record is not good. It shows their lack of sensitive to our beautiful Park Rapids Lakes and Tourism Area. Please deny them the right to do this type of development and destruction on anymore of the natural resources in our area.

GRE's application mentions needs based into the future for 5+ years, 7+years and 20-30+years for the total powering of this transmission line. (What is the REAL NEED? And when does it really happen?) GRE, by their own application, seems to hedge on the needs issue and skirts around it using their own timelines. A good plan of action would be to wait until our economy has stabilized to better project future demand and needed development.

As the PUC you have the power, right (and maybe obligation) to reject this application and require additional information to be submitted, or accept the application as complete upon filing of supplemental information.

In closing I raise a final concern as to GRE's methods of developing substations and transmission lines. GRE has completed several projects in the Park Rapids Area. I questions how these projects are usually (always) under 10 miles in length. Is it because they know a Certificate of Need is not a requirement for less than 10 miles? It doesn't seem to pass the smell test!

Thank you for taking the time to read this letter and submit it to your file on Docket No. ET2/TL-10-86. Hopefully this application will not be rubberstamped by the PUC.

Sincerely,

A handwritten signature in cursive script, appearing to read "Tony and Dorothy Platz". The signature is written in dark ink and is positioned above the typed name.

Tony and Dorothy Platz  
15576 Co Rd #18  
Park Rapids, MN 56470

**Ek, Scott (COMM)**

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**From:** sarah platz [sarah-lynn-platz@hotmail.com]  
**Sent:** Thursday, May 13, 2010 9:35 PM  
**To:** Ek, Scott (COMM)  
**Subject:** Docket TL-10-86

Sarah Platz  
15576 County 18  
Park Rapids, MN 56470

05-13-10

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

Re: Docket TL-10-86

Dear Mr. Ek:

I am in favor of locating Great River Energy's 115 kV transmission line along the northern alternative route located west of Emmaville from CSAH 4 to Highway 71. If the substation were to also be located at this vicinity, it would be a preferred site for future growth needs.

This route is made up of primarily county and state land, affecting as few private properties as possible while preserving the aesthetics of our lake sensitive area and tourism industry.

Thank you for your time.

Sarah Lynn Platz

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The New Busy is not the old busy. Search, chat and e-mail from your inbox. [Get started.](#)

Rapid River Logging Camp  
Kenneth Pritchett  
21305 Fox Haven Trl.  
Park Rapids, MN 56470

May 11, 2010

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



Re: Docket TL-10-86

Dear Commissioners:

The Rapid River Logging Camp has been a restaurant for 56 years. What we have to sell is the natural beauty of the area. It would be very detrimental to the business to destroy this theme. Therefore I am very much opposed to this power line crossing the Rapid River Logging Camp property. Some of the trees that would have to be removed are older than a hundred years. We would then look like any other restaurant. We would like the commission to consider an alternate route.

Sincerely,

A handwritten signature in black ink, appearing to read "Kenneth Pritchett", written over a horizontal line.

Kenneth Pritchett

## Fact Sheet on Chemically Treated Wood Utility Poles

- Wood preservatives used to chemically treat wood utility poles contain dangerous chemicals, including dioxins, which harm human health and the environment. The last legal remaining use of pentachlorophenol (penta) is as a wood preservative in utility poles.
- There are approximately 135 million chemically treated wood utility poles in the U.S. Three percent of these poles are replaced annually.
- Wood preservatives account for nearly one-third of the 2.4 billion pounds of pesticides annually used in the U.S. Nearly 600 million cubic feet of wood poles (approx. four million poles) are treated with these chemicals each year.
- The three major chemical wood preservatives are pentachlorophenol (penta), creosote, and arsenicals (copper chromium arsenate, or CCA). A fourth, copper naphthenate, is considered an alternative.
- Chemical treating of wood poles is one of the last remaining uses of penta and creosote – 43% of all poles are treated with penta; 42% of all poles are treated with arsenic; and 13% are still treated with creosote.
- The use of penta is prohibited in 26 countries around the world, but not in the United States.
- Penta and its contaminants, dioxin, furans, and hexochlorobenzene are considered the United Nations Environmental Program to be persistent organic pollutants (POPs). These contaminants are restricted under the Stockholm Convention on Persistent Organic Pollutants signed by the United States in 2001.
- Wood preservatives are ranked among the most potent cancer agents. They are also promoters of birth defects, reproductive problems and nervous system toxicants. The Environmental Protection Agency (EPA) assigned a cancer risk 3.4 million times higher than acceptable for people that apply penta to poles in the field, according to EPA's draft science chapter on penta that was released in 1999.
- There are at least 795 wood preserving plants in the U.S. whose operations and waste products are not adequately regulated.
- In 1984, EPA issued a standard to limit dioxin contamination in penta to 1 part per million (ppm). In 1986, under pressure from the chemical industry, lead by the sole producer of penta in the U.S., Vulcan Chemical Co., EPA agreed to raise the dioxin levels by 4 times to 4 ppm. in some cases. This issue has not been revisited since 1986.
- The wood preserving industries strive to deny and avoid the cost and potential liability of the disposal of treated poles. A Beyond Pesticides/NCAMP study found that more than 60% of utilities regularly give away poles taken out of service. Given EPA's concern for residential exposure this practice may have to stop.
- Poles made of alternative materials, such as recycled steel, concrete, composite, or the burying of lines, are all alternatives to wood poles that currently are used. The salvage value of steel poles contrasts sharply with the disposal costs of treated wood utility poles.
- In 2001, the European Union severely restricted the sales and use of creosote after an EU scientific committee concluded from a recent study that creosote has a greater potential to cause cancer than previously thought.
- In February 2002, EPA released for comment a preliminary agreement with the three major manufactures of CCA to end manufacturing of wood preserved with CCA for residential use by the end of December 2003. As of February 2003 the final agreement had not been released.
- January 2003, the European Union announced a ban on all but a restricted number of industrial uses of CCA.
- In February 2003, the U.S. Consumer Product Safety Commission announced that it found that that some children may face an increased risk of developing lung or bladder cancer over their lifetime from playing on playground equipment made from CCA pressure-treated wood. This risk is in addition to the risk of getting cancer due to other factors over one's lifetime.

**Beyond Pesticides/National Coalition Against the Misuse of Pesticides**  
**701 E Street, SE, Suite 200, Washington, DC 20003**  
[www.beyondpesticides.org](http://www.beyondpesticides.org)