BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS AND RECOMMENDATIONS OF THE MINNESOTA DEPARTMENT OF COMMERCE ENERGY FACILITY PERMITTING STAFF

DOCKET NO. ET2, E015/TL-10-1307

Meeting Date: February 16, 2012……..…….……Agenda Item #

Company: Great River Energy and Minnesota Power

Docket No. PUC Docket Number: ET2, E015/TL-10-1307
In the Matter of the Application for a HVTL Route Permit for the Savanna 115 kV Transmission Line Project.

Issue(s): Should the Commission find that the Environmental Assessment and the record adequately address the issues identified in the Scoping Decision? Should the Commission issue a HVTL Route Permit identifying specific routes and other permit conditions for the proposed Savanna HVTL project?

EFP Staff: William Cole Storm….…….651-296-9535

Relevant Documents (in Commission Packet).

- GRE/MP's HVTL Route Permit Application….....……February 9, 2011.
- GRE Key Map Book…….September 12, 2011
- DOC's Scoping Decision…….June 10, 2011.
- Environmental Assessment……..October 21, 2011.
- ALJ's Public Hearing Summary..……December 29, 2011

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

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Documents Attached.

1. Site map illustrating the study area in which the route will be located.
2. Proposed Findings of Fact, Conclusions, Order.
3. Proposed HVTL Route Permit.

(Note: Relevant documents and additional information can be found on eDockets (E002/TL-10-1307) or the PUC Energy Facilities Permitting website

http://energyfacilities.puc.state.mn.us/Docket.html?Id=31883)

Statement of the Issue

Should the Commission find that the Environmental Assessment (EA) and the record adequately address the issues identified in the Scoping Decision? Should the Commission issue a high voltage transmission line (HVTL) route permit identifying specific routes and other permit conditions for the proposed Savanna HVTL project?

Introduction

Great River Energy (GRE) is a not-for-profit generation and transmission cooperative based in Maple Grove, Minnesota. Great River Energy provides electrical energy and related services to 28 member cooperatives, including Lake Country Power, Mille Lacs Energy Cooperative, and East Central Energy, the distribution cooperatives serving the area proposed to be supplied by the new transmission lines. Great River Energy's distribution cooperatives, in turn, supply electricity and related services to more than 639,000 residential, commercial, and industrial customers in Minnesota and Wisconsin.

Minnesota Power (MP) is an investor-owned public utility headquartered in Duluth, Minnesota. Minnesota Power supplies retail electric service to 136,000 retail customers and wholesale electric service to 16 municipalities in a 26,000-square-mile electric service territory located in northeastern Minnesota. Minnesota Power generates and delivers electric energy through a network of transmission and distribution lines and substations throughout northeastern Minnesota. Minnesota Power's transmission network is interconnected with the regional transmission grid to promote reliability and Minnesota Power is a member of the Midwest Reliability Organization and the Midwest Independent Transmission System Operator.

The Applicants applied for a high-voltage transmission line route permit to construct the new Savanna 115 kilovolt (kV) Switching Station near Floodwood, Minnesota, and to rebuild approximately 37 total miles of existing 69 kV transmission line to 115 kV specifications between:

- Lake Country Power's existing Cedar Valley Substation and the new Savanna Switching Station, and

- The Savanna Switching Station, Lake Country Power's existing Gowan Substation, and Great River Energy's existing Cromwell Substation.

Project Description

The Applicants proposed that the new lines follow the same alignment (route request is 300 feet wide, 150 feet either side of the existing transmission line centerline) that the existing Great River Energy 69 kV lines presently follow. The proposed plan includes:

- Construct the new Savanna 115 kV Switching Station in Section 32 of Van Buren Township.
- Rebuild approximately seven miles of existing Great River Energy 69 kV transmission line to single circuit 115 kV between Lake Country Power's existing Cedar Valley Substation in Cedar Valley Township and the new Savanna Switching Station.
- Rebuild approximately nine miles of existing Great River Energy 69 kV transmission line to single circuit 115 kV between the new Savanna Switching Station and Lake Country Power's existing Gowan Substation in Floodwood Township.
- Rebuild approximately 21 miles of existing Great River Energy 69 kV transmission line to double circuit 115/69 kV between the Lake Country Power Gowan Substation and Great River Energy's existing Cromwell Substation in Kalevala Township.
- Modify the Lake Country Power Cedar Valley Substation and Great River Energy Cromwell Substation to accommodate the 115 kV transmission lines.

This project will result in a new 115 kV line between the proposed Savanna Switching Station and the Cedar Valley Substation, a new 115 kV line between the Savanna Switching Station and the Cromwell Substation, and an upgraded 69 kV line between the Gowan Substation and the Cromwell Substation.

The transmission lines lie entirely in Minnesota in St. Louis and Carlton counties. Single-pole wood structures with horizontal post insulators will be used for most of the rebuild. Laminated wood poles or steel poles may be required in some locations (angle poles or areas where soil conditions are poor and guying is not practical), and two pole H-Frame structures may used in some areas. Typical pole heights will range from 60-85 feet above ground and the average span would be 350 to 400 feet for single pole structures and 600 to 800 feet for H-Frame structures. Small sections of the existing line near the two St. Louis River crossings have distribution under-build, which would be attached to the new 115 kV transmission line structures. The average span for these structures would be approximately 250 to 350 feet.

The Applicants propose that the majority of the new lines would follow the alignment of the existing 69 kV lines. A 15-foot offset from the existing pole locations may be required in some areas. The necessary easement width is 50 feet on each side of the transmission centerline; however, in areas where the line follows an existing distribution line or roadway, the easement may overlap with existing easements and/or the road right-of-way. Great River Energy has existing easements for the majority of the 69 kV line and anticipates that only minimal additional property will be required when the line is upgraded to 115 kV. Great River Energy intends to

enter into new easements or amendments of the existing easements with landowners to update the language to reflect typical provisions included in today's easements.

The project will cost approximately $29 million dollars.

Regulatory Process and Procedures

Minnesota Statutes Section 216E.03, subd. 2, provides that no person may construct a high voltage transmission line without a route permit from the Commission. An HVTL is defined as a transmission line of 100 kV or more and greater than 1,500 feet in length in Minnesota Statutes Section 216E.01, subd. 4.

The proposed transmission lines in the GRE/MP application are HVTLs and therefore a route permit is required prior to construction.

The route application was reviewed under the Alternative Permitting Process (Minn. R.7850.2800 to 7850.3900) of the Power Plant Siting Act (Minn. Stat. § 216E). The Alternative Permitting Process is shorter than the full permitting procedures and does not require the Applicant to propose alternative routes to the preferred route, but does require the Applicant to disclose rejected route alternatives and an explanation of why they were rejected.

Route Permit Application and Acceptance
On February 9, 2011, GRE/MP submitted a high voltage transmission line (HVTL) Route Permit application to the Commission for the proposed transmission line rebuild to the existing 69 kV between Cromwell and Cedar Valley. The docket number for the route proceedings is ET2, E015/TL-10-1307.

The Commission released an order on April 4, 2011, finding the route permit application to be complete and initiating the alternative review process.

Public Information and Environmental Assessment Scoping Meeting
DOC EFP staff is responsible for conducting the environmental review for route permit applications to the Commission (Minn. Rules 7850.3700). Environmental review for a project of this size requires a public information/scoping meeting, development of a *Scoping Decision* and the preparation of an environmental assessment (EA). An EA examines the potential human and environmental impacts of a proposed project, alternative routes for the project, and potential mitigative measures.

On April 21, 2011, the DOC EFP sent notice of the place, date and times of the Initial Public Information and Scoping meeting to those persons on the General List maintained by the PUC, the agency technical representatives list and the project contact list.

Notice of the public meeting was also published in the local newspapers.

On Wednesday, May 18, 2011, the DOC EFP staff held two public information/scoping meetings at the Fine Lakes Township Hall in Wright, Minnesota. The meetings included two sessions, one starting at 2:00 pm and another starting at 6:00 pm. The meeting covered and fulfilled both the CN and Routing procedural requirements. The purpose of the meeting was to provide information to the public about the proposed project, to answer questions, and to allow the public an opportunity to suggest alternatives and impacts that should be considered during preparation of the environmental review document.

Approximately 12 people attended the public information and scoping meetings; five individuals took the opportunity to speak on the record. A court reporter was present to document oral statements.

A variety of questions were asked and answered during the oral discussion; topics included: specifics on which lines and poles will be removed, and design/construction of any new poles; specifics on the proposed alignment and easement requirements; construction methods that allow for "hot" work to avoid the off-set of the right-of-way (ROW); the concepts of route width and ROW width; sources of power generation for this project; and timeline and milestones of the application review process.

Written comments were due no later than Wednesday, June 1, 2011. Nine written comments were received.

The major areas of concern for scoping expressed during the public comment period included: health and safety issues, property values, compensation for easements, avian impacts, impacts of herbicides in wetlands/public waters, and flexibility in siting the final alignment.

These items and issues, along with the typical HVTL routing impacts, have been incorporated into the proposed Order on the Environmental Assessment Scoping Decision.

Alternative routes, alternative route segments and modifications to the Applicants' proposed alignment were discussed during the scoping meeting and in comments received during the scoping comment period.

Scoping Decision

The items, issues and alternatives raised during the scoping meeting and comment period were reviewed in preparation of the proposed Order on the Environmental Assessment Scoping Decision.

Two alternative route segments/alignment modifications (the Goodell Alternative Route Segment and the Lund Alternative Route Segment), along with the typical HVTL routing impacts, were carried forward into the Scoping Decision.

EFP staff submitted an additional alternative route segment (Cedar Valley Substation to Savanna Switching Station Alternative Route Segment) for evaluation in the environmental review document.

The DOC released its EA Scoping Decision on June 15, 2011. The DOC EFP staff provided a Notice of Scoping Decision to all parties on the project contact list.

Alternatives Carried Forward

Goodell Alternative Route Segment: A resident located along the south side of Hingeley Road (County State Aid Highway 86 - CSAH) in Section 15, Township 50 north, Range 20 west, requested that an *alternative route segment* be considered in a portion of the proposed Savanna HVTL route (Applicant's Key Map Book, Map 22 and 23). The alternative route segment lies within the portion of the proposed route that includes a rebuild of approximately nine miles of existing GRE 69 kV line to double-circuit 115/69 kV line, south of Lake Country Power's Gowan Substation.

The Goodell Alternative Route Segment would modify an approximately one mile segment of the proposed route along CSAH 86 (Hingeley Road) where the road runs west from the intersection of Norlund Road (Township Road 5004) in Fine Lakes Township. The current proposal consists of utilizing the existing 69 kV ROW that runs along the south side of CSAH 86; the Goodell Alternative Route Segment would relocate this ROW so that it follows the north side of CSAH 86.

This alternative would impact five new parcels; four corporate owned (Potlatch Corporation) and one private undeveloped parcel (Hokala). The relocation of the ROW would move the line off of four private parcels, two of which are developed.

The Applicants' proposal is to rebuild the existing 69 kV line to a double-circuit 115/69 kV line transmission line.

The stated purpose of this alternative route segment is to reduce the impact to resident, developed parcels along this segment of the proposed HVTL rebuild.

An additional option included in the request is consideration of moving the Lake Country Power distribution line (which is also located along the south side of CSAH 86) to the north side of CSAH 86 as a possible distribution under build with the proposed 115 kV transmission line.

Lund alternative route segment: Several members of the Lund family, who own four forty-acre parcels along the west side of Stremel Road (County Road 192-CR) requested that an *alternative route segment* be considered in a portion of the proposed Savanna HVTL route (Applicant's Key Map Book, Map 38 and 39).

The Lund Alternative Route Segment lies within the portion of the proposed rebuild route that GRE has stated will need an "off-set" of the centerline due to the need to keep the existing 69 kV line energized; the consequence of this off-set is the creation of an addition HVTL ROW to the west of the existing ROW.

The Lund Alternative Route Segment would modify an approximately two mile segment of the proposed route along Stremel Road (CR 192), between the proposed Savanna Switching Station

north to Parantala Road (County Road 732) in Van Buren Township. The current 69 kV line runs along the west side of Stremel Road (CR 192) from the proposed switching station to Parantala Road (County Road 732); the Lund Alternative Route Segment would relocate this ROW so that it follows the east side of Stremel Road.

An additional option included in the request is consideration of so called "hot work" methods of construction (i.e., hot stick, leaning the existing poles, etc.) that would allow the new 115 kV to remain in the existing ROW.

The Lund family has established a memorial site in a stand of tamaracks to honor a deceased sibling. The memorial and tamarack stand are to the west of the existing 69 kV ROW; the concern is that this area may lie within, or very near to, the proposed new 115 kV ROW. The stated purpose of this alternative route segment or alternative construction methodology is to eliminate the impact to the tamarack stand and memorial therein.

Cedar Valley Substation to Savanna Switching Station Alternative Route Segment: GRE has stated that the section of the proposed route between the existing Cedar Valley Substation and the proposed Savanna Switching Station will be "off-set" from the existing 69 kV line ROW due to the need to keep the 69 kV line energized during construction of the new 115 kV HVTL, in essence creating a new ROW for this section of the proposed project.

The creation of new ROW or expansion of existing ROW, as proposed, makes the evaluation of similar alternatives practicable. This route alternative segment would follow the MP 115 kV 9 line east-northeast out of the proposed Savanna Switching Station for approximately one mile to the point where the MP 9 line crosses the MP 230 kV 98 line. At this point, the route alternative segment would turn northwest and follow the MP 98 line for approximately six miles to a point just (1/4 mile) east of the Cedar Valley Substation. The route then makes a short (1/4 mile) cross-country run to the west to tie into the Cedar Valley Substation (Applicant's Key Map Book, Cedar Valley-Savanna Alternative, Map 1 through 10).

A route width of 700 feet centered on the MP 9 and MP 98 line will provide adequate room to evaluate placing the new ROW on either side of the existing ROWs.

The purpose of this alternative route segment is to allow the existing 69 kV to remain energized during construction of the new 115 kV HVTL, maintain the concept of paralleling/overlapping of existing ROWs, and utilizes, to a greater degree, public lands over privately owned lands.

There was no Advisory Task Force established for this routing docket.

Environmental Assessment

Since there are two concurrent environmental reviews required for the Savanna Rebuild Transmission Line Project – one for the CN application and one for the route permit application – DOC EFP staff elected to combine the environmental review for the two applications (Minn. Rules 7849.1900). The result was a single environmental review document, an Environmental Assessment, which addresses the issues required in Minnesota Rules 7849.1500, subpart 1 and

Minnesota Rules, 7850.3700, subpart 4, and as determined in the Scoping Decision of June 14, 2011.

The DOC EFP staff released the EA on October 21, 2011.

Public Hearing
EFP staff made request to the Minnesota Office of Administrative Hearings for an administrative law judge (ALJ) to preside over the public hearing and provide a summary of testimony.

The DOC EFP staff issued a Notice of Public Hearing and Availability of the Environmental Assessment on October 21, 2011, and provided the Notice to all individuals on the project contact list. The notice of the public hearings was published on November 6, 2011, in the *Duluth News Tribune*, and on November 10, 2011, in the *Floodwood Forum*. Notice of the public hearings was also published in the *EQB Monitor* on October 31, 2011.

A combined public hearing (CN and Routing) was held on November 15, 2011, at the Fine Lakes Township Hall in Wright, Minnesota. ALJ Bruce H. Johnson presided over the hearing; the comment period was open for written comments through November 29, 2011.

Approximately 18 members of the public attended the public hearing; eleven persons took the opportunity to speak on the record. Two comment letters were submitted to the ALJ during the comment period for the public hearing.

The ALJ released a Summary of Testimony and Written Comments on December 29, 2011.

Public Hearing Comments
A variety of questions were asked and answered during the public hearing between the ALJ, staff, the Applicants and the public; topics included: which specific route segment would require an off-set from the existing 69 kV ROW; vegetation removal and management; status of current easements; the concepts of route width and ROW width; and construction schedule.

A member of the public (Nate Goodell) spoke in support of the Goodell Alternative Route Segment (described previously) and the specifics of his proposed alternative were discussed.

Mr. Roy Marlow attended the public meetings on behalf of the Marlow Trust, the Marlow Estate, and himself and proposed the *Marlow Alternative Alignment*, a request to have the alignment (ROW) for the new 115 kV line moved from the west side to the east side of Hingeley Road. Although this alignment alternative was not specifically discussed in the Department's scoping decision, or in the Environmental Assessment, the requested alignment is within the Applicant's proposed 300 foot route width.

Two state agencies filed written comments, the Minnesota Pollution Control Agency (MPCA) and the Minnesota Department of Natural Resources (MnDNR).

The MPCA commented on the need for down-stream permitting (i.e., National Pollution Discharge Elimination System/Stormwater permit, wetland permits, and crossing public waters permits), clearing of vegetation and use of herbicides, and heavy equipment management.

The MnDNR commented on the use of herbicides and avian collision with transmission lines.

Standards for Permit Issuance
The Power Plant Siting Act sets standards and criteria and outlines the factors to be considered in determining whether to issue a permit for a high voltage transmission line (Minn. Stat. § 216Eand Minn. R. 7850.4000). The law also allows the Commission to place conditions on high voltage transmission line permits (Minn. Stat. § 216E.03 and Minn. R. 7850.4600).

EFP Staff Analysis and Comments

EFP staff has prepared the attached proposed Findings of Fact, Conclusions of Law, and Order and proposed Route Permit. The Findings show that the alternative permitting process has been conducted in accordance with Minn. R. 7850.2800 to 7850.3900, identify route impacts and mitigation measures, and make conclusions of law and order. The proposed route permit includes measures to ensure the line is constructed in a safe, reliable manner and that impacts are minimized or mitigated.

In weighing the differences of the routes for the proposed project, staff was guided by the state's policy of choosing locations that minimize adverse human and environmental impact while insuring continuing electric power system reliability and integrity (Power Plant Siting Act, Minn.Stat. § 216E).

EFP staff reached its conclusions and recommendations based on the analysis in the EA and the comments received in this record.

The record supports several specific items that merit consideration relative to alternative route segments and special conditions in the HVTL Route Permit for the Savanna HVTL project.

These items include:

Goodell Alternative Route Segment. The Goodell alternative route segment modifies an approximately one mile segment of the proposed route along CSAH 86 (Hingeley Road) where the road runs west from the intersection of Norlund Road (Township Road 5004) in Fine Lakes Township. An additional option included in the request is consideration of moving the Lake Country Power distribution line (which is also located along the south side of CSAH 86) to the north side of CSAH 86 as a possible distribution under build with the proposed 115 kV transmission line

The Applicants noted at the public hearing, that Lake Country Power's (LCP) parallel distribution line on the south side of Hingeley Road is relatively new, and there is also no current need to relocate it. Additionally, the Applicants expressed concerned that building a line with all

three circuits (i.e., the double circuit 115/69 kV and the LCP distribution line) would not provide them with a system as safe as they would prefer.

Great River Energy offered to consider moving the rebuilt double circuit line northward approximately 20 to 25 feet closer to Lake Country Power's distribution line in order to reduce the overall impact on Mr. Goodell's property and other private properties

Great River Energy has stated that if the Commission adopts the Goodell Alternative Route Segment, thus requiring the 115/69 kV transmission line to be constructed along the north side of CSAH 86, GRE proposes that the new HVTL be located 3-5 feet outside of road right-of-way.

> **EFP Staff Analysis:** This alternative route segment would impact five new parcels; four corporate owned (Potlatch Corporation and Northwest Paper Company) parcels and one private, undeveloped parcel (Hokala). The relocation of the ROW would move the line off of four privately owned parcels, two of which are developed (**Applicants' Key Map Book, Goodell Alternative Route Segment Maps 1 and 2**). EFP staff believes that the Goodell Alternative Route Segment is a reasonable request since it will lessen the impact to the existing residential landowners; the estimated cost different is approximately $67,000.00.
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> The request for relocation of the LCP distribution line presents some safety concerns for installation, operation and maintenance of the HVTLs. Additionally, staff does not consider it to be mitigation from the potential impacts associated with the requested HVTL Route Permit.
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> This alternative route segment has been incorporated into the proposed HVTL Route Permit (Section 5.1).

Lund Alternative Route Segments. The Lund family has established a memorial site in a stand of tamaracks to honor a deceased sibling. The memorial and tamarack stand are to the west of the existing 69 kV ROW; this area lies close to the proposed new 115 kV ROW off-set. The off-set, as stated by the Applicants, is required to avoid taking that portion of the existing 69 kV line "out of service" during the construction of the new 115 kV line. The stated purpose of this alternative route segment or alternative construction methodology is to eliminate the impact to the tamarack stand and memorial therein.

> **EFP Staff Analysis:** This alternative would impact nine new parcels; two State of Minnesota owned and seven privately owned parcels, four of the parcels are developed. The current 69 kV line crosses 10 privately owned parcels along the subject portion of the route, two of which are developed (**Applicants' Key Map Book, Lund Alternative Route Segment Maps 1, 2 and 3**). The estimated cost different is approximately $26,000.00.

The possibility of utilizing "hot-work" in an effort to avoid the need for the off-set was evaluated in the Environmental Assessment; given the transmission structures, the unstable nature of the area soils, and single circuit configuration, these methods are not practical. The estimated cost different is approximately $563,000.00.

The proposed route with off-set, relative to Lund Memorial site, was evaluated in the Environmental Assessment (see Figure 9 in the EA). The memorial site would be approximately 157 feet from the centerline of the new 115 kV transmission if the line were to be constructed as proposed; this would leave a distance of approximately 107 feet between the memorial and the edge of the cleared ROW.

Given the relative locations of the memorial site to the proposed off-set, EFP staff does not believe that there is sufficient potential to impact the memorial site to warrant mitigation, and therefore feels that the Lund Alternative Route Segment is not reasonable alternative to the proposed route/alignment.

This option has not been incorporated into the proposed HVTL Route Permit.

Cedar Valley Substation to Savanna Switching Station Alternative Route Segment. This alternative route segment was developed to avoid the property issues (primarily the Lund property) associated with the need to "off-set" the transmission line ROW between the proposed Savanna Switching Station and the Cedar Valley Substation.

EFP Staff Analysis: This alternative would impact 23 new parcels; eight State of Minnesota owned and 15 private parcels, five of the parcels are developed. This route parallels existing HVTLs along its entire length (**Applicants' Key Map Book, Cedar Valley-Savanna Alternative Route Segment Maps 1 through 10**). The estimated cost different is approximately $2,177,000.00.

This option has not been incorporated into the proposed HVTL Route Permit.

Marlow Alternative Alignment. The Marlow Alternative Alignment was not previously discussed in the Department's scoping decision, or in the Environmental Assessment. However, the requested alignment is within the Applicant's proposed route which was evaluated in the EA; additionally, sufficient information has been added to the record during the hearing and in post-hearing comments to supplement this assessment.

Mr. Jeff Kletscher (Mayor of Floodwood), Mr. John Sederinski (St. Louis County highway foreman), and Mr. Mark Weber (Saint Louis County Resource Management Supervisor) all spoke in support of the Marlow Alternative Alignment during the public hearing process.

On November 29, 2011, GRE submitted post-hearing comments; these comments contained information relative to the Marlow Alternative Alignment. Included in these comments were: 1) aerial maps illustrating the Marlow Alternative Alignment, 2) a comparative impacts table

specifically incorporating the Marlow Alternative Alignment, and 3) documentation from Mr. Kojo indicating that he had no objections to relocating the line to his side of Hingeley Road with the understanding that he would be able to keep any timber on his property that would have to be cut.

> **EFP Staff Analysis:** This alternative would impact 3 new parcels (State of Minnesota owned) and an added portion (additional 500 feet) of a private parcel (Kenneth Kojo). This alternative alignment would follow along the east side of Hingeley Road, from GRE pole #333 southward toward the St. Louis River to GRE pole #302, just north of the river (**Applicant's Key Map Book, Map 27, 28 and 29**). The estimated cost different is negligible.
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> The affected land owner (Mr. Kenneth Kojo) and the County support this alternative alignment. EFP staff believes that the Marlow Alternative Alignment is a reasonable request since it will lessen the impact to the private land on the west side of Hingeley Road, as well as increasing the distance (from 45 feet to 103 feet) of the transmission from a residence along Hingeley Road.
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> This alternative alignment has been incorporated into the proposed HVTL Route Permit (Section 5.2).

Swan Flight Diverters. The Minnesota Department of Natural Resources (MnDNR) has expressed a desire to be consulted on the need, type and placement of swan flight diverters (SFD) along the route.

> **EFP Staff Analysis:** There are a number of rivers and streams in the project area, including the St. Louis River, Floodwood River, East Savanna River, McCarty River, Prairie River, Tamarack River, Kettle River and Heikkila Creek. The proposed transmission line will cross tributaries to the Floodwood River, the St. Louis River and tributary, McCarty River, Prairie River, Tamarack River and two drainages between lakes
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> Lakes in the project area include Prairie Lake (848 acres), Mud Lake, Blackwood Lake (34 acres), Cross Lake (104 acres), Springer Lake (8 acres), North Island Lake (113 acres), South Island Lake (319 acres), Flower Lake (12 acres) and Eagle Lake (389 acres). The route comes the closest to Cross Lake, approximately 140 feet from the riparian area and 300 feet from open water
>
> EFP staff believes that consultation with the MnDNR on the need, type and placement of SFDs along the approved route, prior to the Applicant's submittal of the final Plan and Profile to the Commission, is a reasonable request.
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> A requirement for the Applicants to consult with the MnDNR on the need, type and location SFD, including providing the agency with GIS shapefiles, has incorporated it into the proposed HVTL Route Permit (Section 5.4).

Based on the analysis above, EFP staff makes the following recommendation.

Commission Decision Options

A. Approve and adopt the Findings of Fact, Conclusions of Law and Order for the GRE/MP's Savanna HVTL project (PUC Docket No. ET2, E015/TL-10-1307) which:

1. Determines that the environmental assessment and record created at the public hearing address the issues identified in the EA Scoping Decision;

2. Designates the proposed HVTL (to include the Goodell Alternative Route Segment and Marlow Alternative Alignment) route, Savanna Switching Station, and modifications to the Cedar Valley and Cromwell Substations as the routes/sites for the construction/implementation of the Savanna HVTL project and associated facilities; and

3. Issues a HVTL Route Permit, with appropriate conditions, to GRE/MP.

B. Amend the Findings of Fact, Conclusions and Order and Route Permit as deemed appropriate.

D. Make some other decision deemed more appropriate.

EFP Staff Recommendation: Option A.

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Site Map Illustrating the Study Area

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Proposed Findings of Fact, Conclusions, Order.

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Proposed HVTL Route Permit.