



Minnesota Department of Transportation

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Bill Storm, Project Manager
Office of Energy Security
Minnesota Department of Commerce
85 7th Place East, Suite 500
St. Paul, MN 55101-2198

Re: In the Matter of Great River Energy and Minnesota Power's Savanna 115kV Transmission Project
MPUC Docket No. E280/TL-10-1307

Dear Mr. Storm:

On February 17, 2011, the Minnesota Office of Energy Security (OES) issued a request for public comments on the completeness of the route permit application and certificate of need by Great River Energy (GRE) and Minnesota Power for a new 115kV switching station and high voltage transmission line (HVTL) rebuild known as the Savanna Project. The Minnesota Department of Transportation (Mn/DOT) has reviewed the route permit application for the proposed transmission line project and submits the following comments in response to the Notice.

Based on our review of the application, it appears that the proposed route runs parallel to trunk highway (TH) 73 for approximately 15 miles total and may occupy a portion of the highway right of way. The HVTL will also cross over TH 73, TH 210 and US 2. Mn/DOT has adopted a formal policy and procedures for accommodation of utilities on the highway rights-of-way ("Utility Accommodation Policy"). A copy of Mn/DOT's policy can be found at <http://www.dot.state.mn.us/utility/files/pdf/appendix-b.pdf>. GRE and Minnesota Power will need to obtain permits from Mn/DOT pursuant to the Utility Accommodation Policy for any location where the HVTL will occupy a portion of the highway right-of-way.

Highway crossings by utilities generally do not pose insurmountable difficulties in issuing a permit, and Mn/DOT routinely grants such permits to a variety of types of utilities. These permits usually have conditions associated with them, such as placement of the poles so that they do not become a physical obstruction that might be struck by an errant vehicles or block the visibility of traffic. Mn/DOT also does not permit utilities to run diagonally across intersections and prefers that crossings occur as close to right angles as possible. Mn/DOT has a long history of working with utilities such as Great River Energy and Minnesota Power to establish appropriate conditions in locations where the utility seeks to cross a trunk highway.

There are no known clear zone issues presented by the existing 69kV HVTL. The application states that there may be a need to negotiate new easements with landowners as well as noting that the newly placed structures may have a 15-foot offset from where structures are currently located. Both statements are cause for concern regarding the use of existing trunk highway right-of-way. TH 73 has 75 feet of right-of-way from centerline along most of the proposed project corridor, which is predominately used for maintenance purposes. Vegetation may need to be utilized as a living snow

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fence in some areas. Mn/DOT will apply the principles in its Utility Accommodation Policy to determine an appropriate location for the HVTL along trunk highway rights-of-way.

Any HVTL construction work, including delivery or storage of structures, materials or equipment that may affect Mn/DOT right of way is of concern such that Mn/DOT should be involved in planning and coordinating such activities. If work is required within Mn/DOT right-of-way for temporary or permanent access, please coordinate with Wayne Scheer, District 1 Permits, at 218-725-2780 or Wayne.Scheer@state.mn.us.

Mn/DOT has a continuing interest in working with the OES to ensure that possible impacts to highways, airports, waterways, rail lines and the environmentally significant areas of highway right-of-way are adequately addressed. We appreciate the opportunity to provide these comments.



Stacy Kotch

Utility Transmission Route Coordinator

Minnesota Department of Transportation

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