

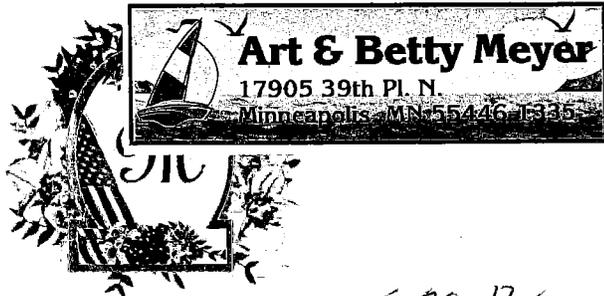
Joan Slifka
3935 Ranier Ln N - Plymouth, MA 01946
May 31, 2012

Dear Mr. Korman,

It is our understanding that the proposed route for the Hollydale line is to follow the existing line adjacent to our properties. We very much oppose this. It is our understanding that no structure shall be within 35 feet of the line. We have homes close to this limit. Our properties may potentially drop in value. There are other concerns as well. Please approve an alternate route for this project - a safe zone.

Sincerely,
Joan Slifka
3935 Ranier Ln N
Plymouth, MA 01946

RECEIVED
MAY 31 AM 7:09
ADMINISTRATIVE
HEARINGS



Dear Mr. Lipman

5-30-12

We believe the new heavy duty proposed line, Hollydale line, is to follow the existing line in our back yard.

Our property value has made one but, and I could hardly stand another drop in value because of your project.

The alternative proposal, made to you, would be less intrusive, affecting far fewer homes.

Please give it strong consideration as we all have much opposition to running it thru our yards as your crew has proposed.

Thank You

Arthur & Betty
Meyer

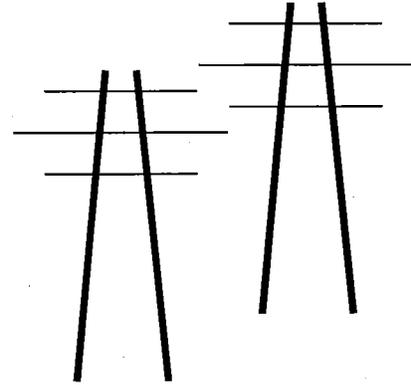


Legalelectric, Inc.

Carol Overland Attorney at Law, MN #254617
Energy Consultant—Transmission, Power Plants, Nuclear Waste
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612.227.8638

P.O. Box 69
Port Penn, Delaware 19731
302.834.3466



May 30, 2012

Eric Lipman
Administrative Law Judge
Office of Administrative Hearings
P.O. Box 64620
St. Paul, MN 55164-0620

eFiled & emailed: eric.lipman@state.mn.us

RE: Comment for Prehearing Conference and Draft Scoping Document
Comments of Carol A. Overland
OAH Docket: 8-2500-22806-2PUC Docket E002/TL-11-152; E002/CN-12-113

Dear Judge Lipman (and eFiling list for above-listed dockets):

Attached please find Staff Briefing Papers regarding the Scott Co. – Westgate project docket E002/CN-11-332. Please note tie-in to the Hollydale Project docket on page 4. Attached also please find Commerce Comments in the Scott Co. – Westgate project docket, p. 3, which contains similar reference and footnote.

I am filing this comment as an independent individual frequently before the Commission, with knowledge of transmission and process issues. I am not making this Comment in the course of representation of any party. I don't plan to attend the Prehearing Conference and hope this Comment is sufficient to raise this issue for scheduling and process discussion.

The Draft Scoping Document for the Hollydale Project (11-152 and 12-113) that is the subject of the Prehearing Conference has just been eFiled today, and tomorrow the Commission will address the Scott Co. – Westgate Certificate of Need and make a determination of whether the Application is complete.

Why does the Scott Co. – Westgate Certificate of Need matter in the Hollydale docket? In the Scott Co. – Westgate docket, Commerce has proposed a “higher voltage solution,” for three dockets in the western metro area¹, but has not disclosed any specifics. In their comment in that docket, Commerce stated:

¹ Scott Co. – Westgate CN-11-332 and TL-11-948; Hollydale CN-12-133 and TL-11-142; Chaska CN-11-826 and TL-??-???

However, the Department notes that Xcel currently has several on-going proceedings regarding new and/or upgraded 115 kV transmission in the west metro area. **There may be a single, more efficient, higher voltage solution to these issues in the west metro. The Department will provide an update on this issue in the Department's comments later in this docket.**

Commerce Comments, p. 3 (emphasis added). This proposal was also noted by PUC staff in the Briefing Papers for tomorrow's Commission meeting.

This is important to this Hollydale routing docket because at this time, the "higher voltage solution" that affects the Hollydale docket has not yet been disclosed and is not known whether the Commerce "higher voltage solution" will be under consideration. If it is under consideration, if it is an option that the Commission may choose, it must be included in the Contested Case. It is very important for those along the line, for parties, and for you to be aware of as this possibility docket moves forward.

In addition, earlier this month in the Scott. Co. - Westgate routing docket (11-948) companion to the above Certificate of Need, the Commission instituted an additional step in Scoping, where the Scoping Document is brought before the Commission for review and approval. This step is important because it assures that last minute changes will not be proposed and put before the Commission, as occurred in the CapX 2020 Brookings-Hampton (Myrick Route) which was remanded, and Hampton-Rochester-LaCrosse (Cannon Falls "blue line" alternative), now pending. Commission review would hopefully assure that Commerce initiatives regarding the size and type of project will not be inserted, such as the Commerce initiated "upsizing" of the CapX 2020 project. The Commission's process should prevent surprises.

It is my hope that the Dept. of Commerce will disclose its "update" at the Prehearing Conference, and if none is disclosed, that they will be prohibited from altering the project proposal without notice to parties, landowners, nearby residents, and interested parties; that the Scoping Document amended and returned to the Commission for Comment and review, and that opportunities to Comment and Intervene extended in fairness to all. Failure to disclose at the outset would cause significant delays to afford due process. Everyone needs to know exactly what is proposed and what impacts it may have.

Thank you for the opportunity to submit this Comment.

Very truly yours,



Carol A. Overland
Attorney at Law

Minnesota Public Utilities Commission

Staff Briefing Papers

Meeting Date: **May 31, 2012** Agenda Item #1

Company: Northern States Power Company, d/b/a Xcel Energy

Docket No. E-002/CN-11-332

In the Matter of the Application of Xcel Energy for a Certificate of Need for the Scott County - Structure #57 115/115kV Conversion and Structure #57 - Westgate Upgrade in Hennepin and Carver Counties

Issue(s): Should the Commission accept the Application as complete?

Staff: Michael Kaluzniak(651) 201-2257

Relevant Documents

Certificate of Need Petition March 9, 2012
Compliance Filing – Notice Plan March 21, 2012
Department of Commerce Comments May 3, 2012
Xcel Energy Reply Comments May 17, 2012

The attached materials are work papers of the Commission Staff. They are intended for use by the Public Utilities Commission and are based upon information already in the record unless otherwise noted.

This document can be made available in alternative formats (i.e., large print or audio) by calling 651.296.0406 (voice). Persons with hearing or speech disabilities may call us through Minnesota Relay at 1.800.627.3529 or by dialing 711.

Laws and Rules

The proposed facilities constitutes a large energy facility pursuant to Minnesota Statutes §216B.2421, subd. 2 (3) since more than 10 miles of facilities with 100 kilovolt (kV) or greater capacity would be created. Minnesota Statute §216B.243, subd. 2 requires that the proposed project obtain a Certificate of Need (CN). Minnesota Rules part 7849 includes the filing requirements for a CN for an electric transmission facility.

The required CN for the proposed project will be reviewed under Minn. Stat. §§ 216B.2421, 216B.243 and Minn. Rules Chapter 7849. For the immediate proceeding, completeness of the Application will be reviewed pursuant to Minnesota Rule 7849.0220, subp. 2.

The Commission is also being asked to make a determination on the appropriate review process for the proposed project. Under Minnesota Rule 7829.1000, the Commission may elect to refer the matter to the Office of Administrative Hearings (OAH) for a contested case proceeding, or the Commission may authorize the use of the informal review process as described in Minnesota Rule 7829.1200.

Background

The proposed project includes the upgrading up approximately 14 miles of 69 kV transmission line to 115 kV operating capacity in Carver and Hennepin Counties, in or near the cities of Chanhassen, Shorewood, Excelsior, Deephaven, Greenwood, Minnetonka, and Eden Prairie, Minnesota. The proposed project includes the following upgrades and additions:

- Converting approximately 3.6 miles of 69 kV transmission line to 115 kV transmission line between the Bluff Creek and Excelsior Substations
- Converting approximately 3 miles of 69 kV transmission line to 115 kV capacity between the Excelsior and Deephaven Substations
- Converting approximately 7.5 miles of 69 kV transmission line to 115 kV capacity between the Deephaven and Westgate Substations
- Upgrading the Excelsior and Deephaven Substations to 115 kV capacity

The Applicant states that the proposed Project would eliminate the overloads on the Scott County Substation transformer and 69 kV lines. The proposed upgraded 115 kV lines is designed to prevent potential future overloads on the 115 kV lines near Scott County Substation as the proposed Project would provide a parallel 115 kV path from the Scott County Substation to the Westgate Substation. This Project is also designed to meet the near and long-term transmission needs for the area. The Applicants states that based on the current load forecasts, the proposed Project will meet the area's needs until 2023. The Applicant anticipates an in-service date of 2014 for the project.

Position of the Parties

Xcel Energy

The Applicant states that its proposal satisfies the criteria of Minn. Stat § 216B.243 and Minnesota Rule 7849.0120 necessary to grant a CN as quoted below¹.

1) Denial of the Project would have an adverse effect upon the future adequacy, reliability, or efficiency of energy supply to the Applicants' customers

- Denial of a Certificate of Need for this Project would result in adverse effects upon present and future adequacy, reliability, and efficiency because of low voltage conditions and overloading in the area. Low voltage conditions can damage customer equipment such as process controls, motor drive controls and automated machines. Overload on transmission facilities reduce the life, or damage the transmission equipment. To remedy this condition, the transmission operators will be forced to curtail service to customers. This would result in outages for residential, retail, commercial and industrial customers. Outages can be extremely costly and inconvenient.

2) A more reasonable and prudent alternative to the proposed facility has not been demonstrated by a preponderance of the evidence

- The Study considered costs, system losses, technical performance, and other factors. The proposed transmission upgrades, including the size, type, and timing, were identified in the Study as the best performing option among alternatives reviewed.

3) The proposed transmission lines will provide benefits to society in a manner compatible with protecting the natural and socioeconomic environments

- The proposed Project will provide electric reliability and allow additional load to be added to the area grid.
- The Project upgrades will utilize existing rights-of-way to the maximum extent possible, thereby reducing the impact to the natural and socioeconomic environments.

4) The proposed transmission lines will comply with relevant policies, rules, and regulations of other state and federal agencies and local governments

- Applicant will secure all necessary permits and authorizations prior to commencing construction of the Project.
- The Project will comport with State of Minnesota policies of providing safe and reliable electric service to all customers.

¹ Certificate of Need Application, pages 8-10, March 9, 2012, Document ID #20123-72419-01.

Minnesota Department of Commerce

The Minnesota Department of Commerce (Department) Energy Regulation & Planning Unit (ERP) filed its comment on the Application on May 3, 2012. The Department does not have any disputes as to material facts and did not request that the Commission order a contested-case proceeding.

The Department ERP, however, stated that there may be a single, more efficient, higher voltage solution in the western Twin Cities area to the issues cited in the Application. Development of such an alternative in multiple dockets may be facilitated by a contested case. ERP intends to provide an update on this issue in its comments on the merits later in this docket. Also, the Department ERP recommended that the Commission review the comments and reply comments of other parties, assess the explanation for any request for a contested case, and order a contested case if the petition provides reasonable grounds to do so.

The Department ERP recommended that in reply comments, Xcel provide or otherwise indicate the location in the Application of a discussion of alternative conductors, and a discussion of demand management in the local area.

ERP recommends that the Commission determine that the Applicant's petition is substantially complete upon clarification of the above two items; and order a contested case if a request provided reasonable grounds to do so.

Xcel Energy - Reply

Xcel Energy filed reply comments on May 17, 2012. In its reply, the Applicant agreed with the Department's review and conclusions. Xcel agreed to supplement its Application with the requested additional data.

The Applicant also noted that while there are two additional pending CN Applications for 115 kV transmission upgrade projects in this area, combining these projects into one contested case hearing is unlikely to allow for a more efficient regulatory review. Xcel requests that the Commission find the Application complete.

Staff Analysis

A. Completeness Review

Staff agrees with the review and analysis of the Department. Staff recommends that the Commission determine the Application to be substantially complete upon submittal of the supplemental information as identified.

B. Review Process

Staff agrees with the Department's recommendation that the Commission direct the use of the informal review process at this time and only order a contested case upon consideration of a petition for one.

The informal review process consists of using initial and reply comments to develop the record in a proceeding rather than the more formal contested case procedures. The informal review process has been utilized for processing need applications on projects such as wind generation proposals and for some transmission line projects. The informal review process has been successfully to develop a record on which the Commission can make the necessary determinations under law and rule.

The informal review process allows for substantive comments on the merits of a need application, while providing the same opportunities for members of the public to express their concerns without the more formal requirements of a contested case procedure. The informal review process allows participants to review the record, offer their opinions and suggestions without the requirement of hiring witnesses, developing testimony or preparing for cross examination. In addition, the informal review process also allows for the public to participate at public hearings administered by an Administrative Law Judge

The informal review process allows for participation on a more limited basis while still allowing entities to question the company through information requests and to indicate, through comment, to evaluate the need of the proposed project.

The informal review process also provides an opportunity for the identification of contested issues of fact requiring a formal process. When an informal review process is initiated by the Commission, a *Notice of Comments* on the merits is issued. The Notice specifically requests the identification of questions of fact associated with an application. The process allows for contested issues to be raised through the reply comment process.

Staff recommends that the Commission direct the use of the informal review process to examine the merits of Xcel's application. If a contested issue is identified during the informal process, staff will bring the question to the Commission for a determination. Staff also recommends the Commission adopt the Administrative Responsibilities identified below.

C. Alignment with the Routing Proceeding

The corresponding Route Permit Application (RPA) for the proposed project is Commission Docket No. E002/TL11-948.²

The decisions in CN and RPA dockets focus upon separate objectives. Certificate of need dockets examine questions of size, type, timing of the proposal and the reasonableness of the proposed project. The RPA proceeding evaluates the impacts of various routes and the possible

² The Order finding the route permit application for Docket No. E002/TL-11-948 complete is scheduled to issue on May 24, 2012.

mitigation of those impacts. Both processes look at human and environmental impacts, cost and the public interest generally. Neither process determines the prudence or cost allocation of the project.

Generally, certificate of need applications are received and evaluated for completeness prior to or simultaneous with the submission of route permit applications. In this case, the CN Application was not accepted when the RPA was evaluated for completeness, therefore the question of a Joint Proceeding as per Minnesota Rule 7850.1600 was not addressed at the May 10, 2012 Agenda Meeting. Therefore, it is appropriate to evaluate a joint proceeding for the two dockets at this time.

The Department of Commerce Energy Facilities Permitting Unit (EFP) is required to prepare an Environmental Report (ER) on proposed large electric power generating plants that come before the Commission for a determination of need. The ER must contain information on the human and environmental impacts of the proposed project associated with the size, type, and timing of the project, system configurations, and voltage. The environmental report must also contain information on alternatives to the proposed project and address mitigating measures for anticipated adverse impacts.

Minnesota Rule 7849.1900, Subpart 1, provides that in the event an applicant for a certificate of need for a high-voltage transmission line applies to the Commission for a route permit prior to the time the EFP completes the environmental report, the Department EFP may elect to prepare an environmental assessment (EA) in lieu of the required environmental report. If combining the processes would delay completion of the environmental review, the applicant and the Commission must agree to the combination. If the documents are combined, EFP includes in the EA the analysis of alternatives required by part 7849.7060, but is not required to prepare an environmental report under part 7849.7030.

Minnesota Statutes § 216B.243, Subdivision 4, require a public hearing be held for the certificate of need to obtain public comments on the necessity of the project. Informal or expedited proceedings (i.e., non-contested) may be used when there are no material facts in dispute (Minnesota Rule 7829.1200). Staff maintains that further efficiencies may be achieved by combining the required hearings in the CN and route permit process.

Staff has concluded that combining the ER and EA into a single environmental review document is warranted in this case. The route permit application was filed prior to the CN Application and the CN was filed prior to the scoping process for the EA was concluded. Thus, preparing an EA in combination with the ER will achieve process efficiencies. It will enable staff to solicit comments pertinent to the scoping of both the CN Environmental Report and the RPA Environmental Assessment at a single public informational meeting. The Department would then develop one scoping document and one environmental document for both applications. Combining the processes will not likely delay completion of the environmental review.

Because the route permit application was filed before the CN Application, efficiencies could also be gained by coordinating the public hearing of the CN proceeding with the public hearing required in the Alternative Review process.

D. Administrative Responsibilities

To facilitate the review process, staff suggests the Commission delegate administrative authority to the Executive Secretary and adopt the following additional items:

- the name, telephone number, and e-mail address of the Commission employee designated to facilitate citizen participation in the process;
- request that the Department continue to study issues and indicate during the hearing process its position on the reasonableness of granting a certificate to the Applicant;
- a requirement that the Applicant facilitate in every reasonable way the continued examination of the issues by the Department of Commerce and Commission staff;
- a request that the Applicant place a CD or hard copy of the Application for review in one or more Government Center(s) and/or Public Library(ies) in the vicinity of the project;
- a directive that Commission staff work with the Administrative Law Judge and the staff of the Department of Commerce in selecting suitable locations for a public hearing on the application; and
- a directive that the Applicant work with staff of the Commission to arrange for publication of the notice of hearings in newspapers of general circulation at least ten (10) days prior to the hearings, that such notice be in the form of visible display ads, and proofs of publication of such ads be obtained from the newspapers selected.

Decision Alternatives

With respect to the Project Application, the Commission could:

A. Completeness Determination

1. Accept the Application as complete as filed on March 9, 2012.
2. Accept the Application as complete upon filing of a Supplement in response to the Department's recommendation.
3. Find the Application incomplete and specify the information deficiencies.
4. Make some other decision deemed more appropriate.

B. Review Process

1. Direct the use of the informal review process of comment and reply; delegate administrative authority to the Executive Secretary.
2. Direct the use of the contested case review process.
3. Make some other decision deemed more appropriate.

C. Joint Proceeding with the Project Route Permit Application

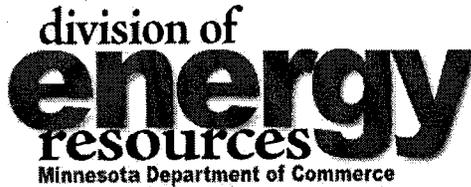
1. Request the Department of Commerce Energy Facilities Permitting staff to prepare an environmental assessment for the certificate of need and route permit applications jointly in lieu two separate environmental reviews.
2. Request the Department Energy Facilities Permitting staff to jointly conduct the public meetings for the certificate of need and route permit applications.
3. Make some other decision deemed more appropriate.

D. Delegation of Administrative Responsibilities

1. Delegate administrative authority to the Executive Secretary for the Additional Items identified in Part D, above.
2. Make some other decision deemed more appropriate.

Staff Recommendation

Staff recommends alternatives A.2., B.1., C.1 & C.2 and D.1



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May 3, 2012

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Petition for Certificate of Need**
Docket No. E002/CN-11-332

Dear Dr. Haar:

Attached are the comments of the Minnesota Department of Commerce-Division of Energy Resources (Department) in the following matter:

Application to the Minnesota Public Utilities Commission for a Certificate of Need for the Scott County—Structure #57 115/115 kV Conversion and Structure #5—Westgate 115 kV Upgrade.

The petitioner is:

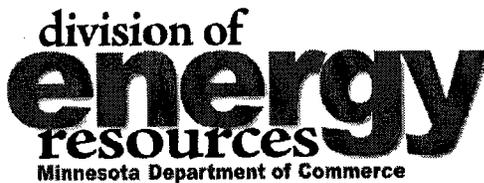
Mark Suel
Government & Regulatory Affairs
Xcel Energy
414 Nicollet Mall
Minneapolis, Minnesota 55401

The Department recommends **Xcel provide clarification in reply comments** and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ STEVE RAKOW
Rates Analyst

SR/jl
Attachment



BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE
DIVISION OF ENERGY RESOURCES

DOCKET No. E002/CN-11-332

I. BACKGROUND

A. NOTICE PLAN

On April 19, 2011 Northern States Power Company, a Minnesota corporation (Xcel or the Company) submitted the Company's *Notice Plan: Southwest Twin Cities Bluff Creek—Westgate Transmission Line Upgrade from 69 kV to 115 kV Capacity* (Notice Petition). The Notice Petition provided a plan to notify potentially affected members of the public as required under Minnesota Rules part 7829.2550.

On May 9, 2011 comments regarding the Notice Petition were filed by the Minnesota Department of Commerce-Division of Energy Resources (Department). On May 13, 2011 reply comments were filed by Xcel. On August 8, 2011 the Commission issued an Order approving the Notice Petition.

B. EXEMPTION REQUEST

On June 17, 2011 Xcel submitted the Company's *Request for Exemption Request: Southwest Twin Cities Bluff Creek—Westgate Transmission Line Upgrade from 69 kV to 115 kV Capacity* (Exemption Petition) in order to obtain exemption from certain data requirements of Minnesota Rules part 7849.

On July 18, 2011 comments regarding the Exemption Petition were filed by the Department. Subsequently, on November 16, 2011 the Commission issued an Order approving the Exemption Petition.

C. CN PETITION

On March 9, 2012 Xcel filed the Company's *Application to the Minnesota Public Utilities Commission for a Certificate of Need for the Scott County—Structure #57 115/115 kV Conversion and Structure #5—Westgate 115 kV Upgrade* (Petition). The Petition requested the Commission approve a certificate of need (CN) for conversions and upgrades to about 20 miles of existing 69 kV transmission line to 115 kV capacity. The project is located in Scott, Carver, and Hennepin Counties.

In response to Xcel's filing, on April 13, 2012 the Commission issued its *Second Revised Notice Soliciting Comments* (Notice). The Notice states that comments on completeness are due May 3, 2012 and reply comments on completeness are due May 17 2012.

Below are the comments of the Department regarding the completeness of the Petition.

II. DEPARTMENT ANALYSIS

A. BACKGROUND

Xcel proposes to upgrade about 20 miles of existing 69 kV transmission line to 115 kV capacity in the Southwest Twin Cities area. According to the Company, the proposed project consists of the following elements:

- Converting the voltage of approximately 5.3 miles of 115/69 kV transmission line to 115/115 kV transmission line between the Scott County substation and Structure #57;
- rebuilding approximately 4.2 miles of existing 69 kV transmission line to 115 kV transmission line between Structure #57 and the Excelsior substation;
- rebuilding approximately 3.0 miles of existing 69 kV transmission line to 115 kV transmission line between the Excelsior and Deephaven Substations;
- rebuilding approximately 7.4 miles of existing 69 kV transmission line to 115 kV transmission line between the Deephaven and Westgate Substations;
- modifying the Scott County and Westgate substations; and
- upgrading the Excelsior and Deephaven Substations to 115 kV capacity.

Since greater than 10 miles of facilities with 100 kV capacity would be created, the proposed facilities qualify as large energy facility (LEF) under Minnesota Statutes §216B.2421, subd. 2 (3). Minnesota Statute §216B.243, subd. 2 requires that LEFs obtain a Certificate of Need (CN). Minnesota Rules part 7849 includes the filing requirements for a CN for an electric transmission facility.

B. COMPLETENESS REVIEW

The Department reviewed the Petition for completeness under Minnesota Rules. The Department concludes that the Company met the completeness requirements with the exceptions noted below.

The Department's review did not find any items that the Department considered incomplete. However, the Department notes that Minnesota Rules 7849.0260 B (3) requires a discussion of "transmission lines with different... types of conductors." It was not clear to the Department if Xcel's discussion of alternatives included consideration of different conductors. Therefore, the Department recommends that Xcel clarify in reply comments where the discussion of alternative conductors is located in the Petition or provide a discussion.

Second, Minnesota Rules 7849.0290 requires a discussion of conservation. This rule was modified by the Commission's approval of the Exemption Petition to require a discussion of "demand management programs used by Xcel Energy to manage peak loads and how these programs affect the substation loads in the specific project area." How the conservation data provided in Appendix D of the Petition applies to the local area was not completely clear as well. Therefore, the Department recommends that Xcel clarify in reply comments where the discussion of demand management programs in the local area is located in the Petition or provide a discussion.

C. PROCESS REVIEW

During the completeness review process the Department also makes a recommendation regarding the proper process to use for the CN proceeding. At this time, Department does not have any disputes as to material facts. Thus, in these completeness comments the Department does not request the Commission to order a contested-case proceeding. However, the Department notes that Xcel currently has several on-going proceedings regarding new and/or upgraded 115 kV transmission in the west metro area.¹ There may be a single, more efficient, higher voltage solution to these issues in the west metro. Development of such an alternative in multiple dockets may be facilitated by a contested case. The Department will provide an update on this issue in the Department's comments later in this docket. Also, the Department recommends that the Commission review the comments and reply comments of other parties, assess the explanation for any request for a contested case, and order a contested case if a party requests such a proceeding and provides reasonable grounds to do so.

¹ See Docket Nos. E002/CN-12-113 for the Hollydale project in Medina and Plymouth, E002/CN-11-826 for the Chaska Area 69 kV transmission in addition to the instant proceeding.

Docket No. E002/CN-11-332
Analyst assigned: Steve Rakow
Page 4

III. DEPARTMENT RECOMMENDATION

The Department recommends that in reply comments, Xcel provide, or indicate the existing location of a discussion of:

- alternative conductors; and
- demand management in the local area.

The Department recommends that the Commission:

- determine that the Company's petition is substantially complete upon clarification of the above two items; and
- order a contested case if a party requests such a proceeding and provides reasonable grounds to do so.

/jl

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Submission Information

Submission Number: 20125-75110
 Submission Date/Time: 05/30/2012 12:04 PM

Filer Information

Filer: Overland, Carol
 Company: Legalelectric - Overland Law Office
 Email: overland@legalelectric.org
 Phone Number: 612-227-8638

Document Information

Document Date: 05/30/2012
 Document Type: Comments
 On Behalf Of: Carol A. Overland

Service List Information

Docket #	List Name
11-152	Official CC Service List

Existing Dockets Information

Related Industry	Year	Number
Energy	11	152

Uploaded Documents Information

Selected Document	Classification	Additional Information
OverlandComment_PHC_DraftScoping_5-30-12.pdf	Public	Comment for Prehearing Conference and Draft Scoping

Electronic Service

Last Name	First Name	Email	Company Name	Delivery Method	View Trade Secret
Agrimont	Lisa	lagrimont@briggs.com	Briggs And Morgan, P.A.	Electronic Service	No
Anderson	Julia	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	Electronic Service	Yes
Carpenter	Tami	tamicarp@comcast.net	N/A	Electronic Service	No
Ferguson	Sharon	sharon.ferguson@state.mn.us	Department of Commerce	Electronic Service	No
Haar	Burl W.	burl.haar@state.mn.us	Public Utilities Commission	Electronic Service	Yes
Hammel	Karen Finstad	Karen.Hammel@ag.state.mn.us	Office of the Attorney General-DOC	Electronic Service	No
Herring	Valerie	vherring@briggs.com	Briggs and Morgan, P.A.	Electronic Service	No
Kotch	Stacy	Stacy.Kotch@state.mn.us	MINNESOTA DEPARTMENT OF TRANSPORTATION	Electronic Service	No
Lindell	John	agorud.ecl@ag.state.mn.us	Office of the Attorney General-RUD	Electronic Service	Yes
McBride	Katherine	kmcbride@meagher.com	Meagher & Gear	Electronic Service	No
Parlow	Marsha	mparlow@greenergy.com	Great River Energy	Electronic Service	No
Sedarski	Joseph G.	joseph.g.sedarski@xcelenergy.com	Xcel Energy	Electronic Service	No
Thompson	SaGonna	Regulatory.Records@xcelenergy.com	Xcel Energy	Electronic Service	No

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Paper Service

Last Name	First Name	Company Name	Address	Delivery Method	View Trade Secret
Lipman	Eric	Office of Administrative Hearings	PO Box 64620, St. Paul, MN - 551640620	Paper Service	Yes

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Collins, Denise (OAH)

From: DebbiStage@aol.com
Sent: Thursday, June 07, 2012 4:25 PM
To: Lipman, Eric (OAH)
Subject: Hollydale 115k Transmission Line
Attachments: xcel final.pdf

Judge Lipman:

Please carefully consider the attached request for buried lines. They're safer, easier to maintain, pose no health risks, don't devalue property, and they don't lose \$100s of thousands of dollars in electric transmission losses. Over time they cost less than unsightly, dangerous, high maintenance, unreliable overhead lines.

Thank you for your consideration. I will be at the meeting tonight as well.
-deb stage

Brian and Debra Stage
17010 41st Place N
Plymouth, MN 55446
June 7, 2012

Dear Judge Lipman,

My husband and I submitted a letter on June 4th stating we hoped Xcel would select Route C as it would impact the least number of residents. However, we never had a clear understanding as to why the lines can't be buried thereby removing all risks from everyone.

The more we have researched it; we believe the option of burying these lines makes more sense than haggling over the routing of suspended lines. It appears that although the initial cost is higher, it is cancelled out by the benefits and there are compelling reasons to pursue this option, including financial benefits to the utility. We wonder why Xcel is not pursuing this approach for locating transmission lines not only in Plymouth but throughout the state.

This letter supersedes our previous letter and expresses our very strong opinion in favor of burying the high voltage lines, because quite frankly **THERE ISN'T A GOOD REASON NOT TO.**

Minnesota has ranked in the top ten states for quality of life/education/industry and healthcare for over a decade. Why are we even considering antiquated, dangerous, high maintenance and unsightly overhead lines?

The technology has been available for several decades. Since 1980 lines carrying voltages as high as 500 kilovolts have been buried in Australia, Austria, Belgium, Canada, Denmark, Finland, France, Germany, Greece, Ireland, Italy, Japan, The Netherlands, Portugal, Spain, Sweden, Britain and South Korea. Within the US, more and more states are passing laws that require all new lines to be buried. **Why would Minnesota, a leader in technology and quality of life elect to go backwards??!!**

Underground cables are much safer than overhead lines.

- No electric fields(EMFs) are emitted from buried lines and magnetic fields are greatly reduced in intensity by being underground vs. overhead
- Health risks are removed along with the removal of EMF exposure
- Buried lines are not subject to damage or DOWNTIME from wind/hurricane/tornados/snow storms/ lightning or vehicular damage (ie truck or car accidents)

Environmental benefits are greater with buried lines

- The greater efficiency translates to less transmission loss and that translates to a lower carbon footprint
- Land can be used for other purposes
- There isn't a visual impact. We can still see Minnesota - land of lakes, trees, parks, scenic highways and blue skies vs. 10,000 power lines

SECURITY and RELIABILITY:

- **Underground cables are much more secure** from environmental hazards, vandalism, acts of terrorism or sabotage.
- **Failures are significantly less** than overhead lines. This gives everyone **more reliable and improved performance** [Consider the downtime to residences and businesses after Hurricane Hugo or the week long outage in New England when the October snowstorm took down miles of lines and trees]

HEALTH ISSUES:

- Study after study shows a much higher incidence of cancer/leukemia/miscarriages/brain tumors/ MS/non-Hodgkin's lymphoma and a multitude of other health issues far exceeding the norm in residents living near high power lines. Even those who dispute the "direct cause" agree that it also cannot be discounted due to the higher percentages/correlation.
- **INTENTIONAL vs. UNINTENTIONAL HARM:** In the past, overhead lines were constructed without knowledge of the health risks. Given today's option of buried lines which emit no EMFs and therefore pose no health risk, **XCEL would INTENTIONALLY be putting residents at risk by not burying the lines.**

COST

- Though the initial cost is greater **this is canceled out by the higher, more costly electric transmission losses escaping from overhead lines which can range from 50-67%.** This cost savings is substantial over the 60 year life of a high voltage power line. [A study in Canada estimated a 1 yr transmission loss was \$220 million!]
- **Maintenance issues are much lower as buried lines are virtually maintenance/hazard free.** Overhead lines incur the additional costs of downed trees, lines and often require support from service crews brought in from other states/countries at great expense. [The New England storm required crews from Canada.] When all the debris was finally removed several months later, all that was left were tree stumps and barren roadways lined with poles and power lines.]
- **Property devaluation must be factored into cost considerations.** Homeowners should not be subject to devaluations ranging from 14% - 30% when there is a better alternative. That is not good for residents of Plymouth or any other community in Minnesota.

Quite simply the cost argument doesn't hold up for the long term. If you combine the reduced maintenance issues, the transmission loss costs over the life of the lines, the downtime for residential and commercial establishments, as well as health risks and home value devaluation, buried lines probably cost less.

Studies in Canada and Europe have shown the cost to be approximately \$1 for every \$1 billion spent (or \$.10 per \$100 million dollars spent) This impacted the average residential consumer bills by \$.05- \$.15 per month. Everyone was willing to accommodate this cost. [Black & Veatch stated that in the U.S., it typically costs \$10 - \$13 million per mile to bury a 345-kilovolt line. The line proposed for the Hollydale project is only 115k.]

In conclusion, we feel most residents would happily pay an additional \$.10 - \$ 3.00 per month to have the lines buried underground.

Minnesota needs to join the other states that have recognized the importance of buried lines for the sake of health risks, security, maintenance costs, reliability and downtime, and they must factor in the damage to homeowners in terms of property devaluation.

There really isn't any other acceptable option and we hope you will give this serious consideration and endorsement.
Sincerely,

Brian & Debra Stage

Brian and Debra Stage

Collins, Denise (OAH)

From: CHARLES CAROLE EIDEM <eidem6@msn.com>
Sent: Sunday, June 10, 2012 11:12 AM
To: Lipman, Eric (OAH)
Subject: OAH Docket No. 8-2500-22806-2

June 10,2012

Dear Mr. Lipman,

We are writing to ask your help in preventing Xcel Energy from using the Hollydale Line to increase the current capacity from 69 KV to 115 KV. When the current lines went in this area was farm land and not neighborhoods where people have invested their time, energy and money into building homes. It is morally wrong to take the right of way and not consider the people who have bought this land and now we are raising our families here. We paid a premium because we look out on a pond and wetlands. The power lines will dramatically decrease our home value as well as our peace of mind as to the safety of living so close to the lines.

We feel the lines should run along major highways NOT neighborhoods. We also have an elementary school right across Medina Road from us. Many hundreds of children go there daily and will be exposed. They say the long term effects of this high EMF exposure is "inconclusive" but their are obvious health hazards. There is a reason they have been banned in Europe.

The best plan would be to bury the lines. Cost should NOT be the major concern. We would like an independent study for health,safety , noise and home value. Who is responsible for the health and potential lives that could be lost due to exposure? No one wants to expose their family to potential danger and yet that is what Excel energy is asking us to do.

Please do the right thing-- STOP the lines from coming through our neighborhood.

You,
and Carole Eidem
39th Ave. North
h, MN. 55446

Thank
Charles
18240
Plymouth

Collins, Denise (OAH)

From: krisscotte@comcast.net
Sent: Saturday, June 09, 2012 2:25 PM
To: Lipman, Eric (OAH)
Cc: krisscotte@comcast.net
Subject: OAH Docket No. 8-2500-22806-2

To:
Judge Eric L. Lipman,
Office of Administrative Hearings

From:
Scott & Kristine Erickson
4815 Cheshire Lane N
Plymouth, MN 55446

Judge Lipman:

I would like to voice my opposition to:

1. The location of Substation Site A
2. The proposed route of new transmission line. Specifically, the proposed route that follows Cheshire Lane to Schmidt Lake Road .

After attending the public information meeting on Thursday, June 7, 2012, I wanted to reiterate my opposition to the above statements. In addition, I wanted to add a few comments that became clear to me after my attendance:

1. When we built our home, we were aware of the power lines on 494 and determined that our home was geographically far enough away that we were not significantly concerned with the EMFs associated with the power line. We were also aware of noise pollution from the current humming of the power lines, traffic noise from 494, and from Fluidyne/Aerodyne Industries that is located between our neighborhood and 494. We even needed to attend a sound check of the wind tunnel testing facility before we could purchase our lot. After seventeen years of being in our home, we did not feel the need to worry about a new high voltage substation located within 1200 feet of our home being built on land that the City of Plymouth had proposed building ball playfields when we built our home.
2. Along with the changes, like everybody in Plymouth that is situated near the power lines, we are concerned primarily with the health risks associated with the high voltage lines and in particular, the risk of the actual substation being located within 1200 feet to our property and even closer to other properties in our 46-home development of Savannah.
3. Minimizing the risk to people must be the first concern. Being that there are several alternatives to the proposed route, I implore the MN Department of Commerce, Xcel Energy and Great River Energy to put the residents of Plymouth first and minimize the impact. Please consider the alternatives, in particular, Substation Site B, and if it maintains that Substation Site A is the only alternative, then it needs to follow Alternate Route E and not submit our neighborhood to the risk of Substation A and additional power poles just to make the project cheaper.
4. Finally, with the location of proposed Substation Site A and the proposed location of the lines on the corner of Cheshire Lane and Schmidt Lake Road, affecting our neighborhood with the health risks and unsightly poles and building, we are very much concerned about the ability to maintain our home value in addition to our neighbor's home values which we all would invariably suffer.

I have additional questions that I have not researched as of yet and were not addressed by the experts in attendance. These questions are:

1. What are the known health effects of living so close to not only the power lines, but the substation? A review of the literature, not supplied by Xcel/GRE, would be extremely beneficial.
2. By burying lines, does that eliminate or reduce the EMFs associated with high voltage lines? Does it affect the EMFs as it comes into/leaves the substation? Again, a review of the literature, not supplied by Xcel/GRE, would be helpful.

Thank you for adding these comments into the public record.

Scott & Kristine Erickson

Collins, Denise (OAH)

From: Lasky, Stuart <Stuart.Lasky@anoka.k12.mn.us>
Sent: Friday, June 08, 2012 7:46 AM
To: Lipman, Eric (OAH)
Subject: OAH Docket No. 8-2500-22806-2

Dear Your Honor:

I was in attendance at the *Hollydale Transmission Line Project* public information meeting last evening at Wayzata High School. Since I am not one to comfortably speak in public, I appreciate the opportunity to contact you by email. I am a cancer survivor on the verge of retirement. Though I came away from the meeting unsure as to the true health impact of EMF (possible carcinogen), I have read enough articles and seen enough news reports to convince me that EMF may very well represent a real threat to me. My guess is it may be years before any definitive research becomes available. In the meantime, however, if the proposed route for the *Hollydale Transmission Line Project* (which literally cuts right through my backyard) proceeds, I will spend the rest of my life in fear for my health. Since my home has already lost value due to the weak housing market and I would have to disclose details of the project to any potential buyer, moving away from the area is not an option.

I recognize I am only one person and have little to no clout/leverage with a company the size of Xcel Energy, but I am afraid and truly hope an alternative solution to this issue can be found. Thank you for your time.

Stuart M. Lasky
18025 39th Place North
Plymouth, MN 55446
(763) 478-8145

Collins, Denise (OAH)

From: Kevin Remde <Kevin@Remde.net>
Sent: Friday, June 08, 2012 6:58 AM
To: Lipman, Eric (OAH)
Cc: Nancy Remde; 'Paul Ablack'; 'ksmcbride@comcast.net'
Subject: OAH Docket No. 8-2500-22806-2

Your Honor,

Thank you, again, for your facilitation of the meeting on June 7th. As suggested, I am writing to you to add a request for consideration to the Hollydale 115 KV Transmission Line Project.

My request –

Like many at the meeting, I was frustrated by what appeared to be the power company's minimal-effort, least-cost solution – mainly because it does appear that they didn't even bother to consider other alternatives.

I feel it's fair to ask Xcel to propose their own choice of a route that is NOT solely based on the existing power line paths; a path that, as mentioned many times at the meeting, was determined back when much of this land was open farmland. Instead, they should simply be required to show a route based on current as well as projected populations, based on current zoning, so that their line would impact as few homes as possible. **It's simple: Let's all pretend for a moment that there is not any existing power line between the Hollydale and Medina substations. What would the best path be?**

I certainly understand that any business is going to do whatever they can to save some money. But I'm very glad for this process that is allowing people to speak out and bring up issues that also need to be considered. Health risks, line noise, and property value impact need to be considered as a NEW route is created.

Thank you,

Kevin and Nancy Remde
18700 37th Ave. N.
Plymouth, MN 55446

Collins, Denise (OAH)

From: alek buzmaker <pgn960@hotmail.com>
Sent: Sunday, June 10, 2012 4:45 PM
To: Lipman, Eric (OAH)
Subject: OAH Docket No. 8-2500-22806-2

To:
Judge Eric L. Lipman,
Office of Administrative Hearings

From:
Alek and Bella Buzhaker
14045 48th Ave N
Plymouth, MN 55446

Judge Lipman:

I would like to voice my opposition to:

1. The location of Substation Site A
2. The proposed route of new transmission line. Specifically, the proposed route that follows Cheshire Lane to Schmidt Lake Road .

After attending the public information meeting on Thursday, June 7, 2012, I wanted to reiterate my opposition to the above statements. In addition, I wanted to add a few comments that became clear to me after my attendance:

1. When we bought our home 12 years ago, we were aware of the power lines on 494 and determined that our home was geographically far enough away that we were not significantly concerned with the EMFs associated with the power line. We were also aware of noise pollution from the current humming of the power lines, traffic noise from 494, and from Fluidyne/Aerodyne Industries that is located between our neighborhood and 494. We even needed to attend a sound check of the wind tunnel testing facility before we could sign up our purchase agreement. We did not expect that in addition to all that, we would have to worry now about a new high voltage substation located within 1000 feet of our home being built on land that the City of Plymouth had proposed originally for ball playfields.
2. Along with the changes, like everybody in Plymouth that is situated near the power lines, we are concerned primarily with the health risks associated with the high voltage lines and in particular, the risk of the actual substation being located within 1000 feet to our property and even closer to other properties in our 46-home development of Savannah.
3. Minimizing the risk to people must be the first concern. Being that there are several alternatives to the proposed route, we strongly encourage the MN Department of Commerce, Xcel Energy and Great River Energy to explore other options and not subject the residents of Plymouth to additional risks and/or minimize the impact. Please consider the alternatives, in particular, Substation Site B, and if it maintains that Substation Site A is the only alternative, then it needs to follow Alternate Route E and not submit our neighborhood to the risk of Substation A and additional power poles just to make the project cheaper. It seems we pay enough taxes to the City of Plymouth to step in and, if all is riding on the cost of the project, chip in so that the risks and impact to the residents is minimized.
4. Finally, with the location of proposed Substation Site A and the proposed location of the lines on the corner of Cheshire Lane and Schmidt Lake Road, affecting our neighborhood with the health risks and unsightly poles and building, we are very much concerned about the ability to maintain our home value in addition to our neighbor's home values which we all would invariably suffer. It does not seem fair that our particular development has to experience the inconvenience, health risks, and financial impact from the new substation.

We hope you will be able to help us resolve this situation and find a better solution.

Alek and Bella Buzhaker

Thank you for adding these comments into the public record.

Scott & Kristine Erickson

Collins, Denise (OAH)

From: Maria Maag <post2maria@yahoo.com>
Sent: Sunday, June 03, 2012 9:20 AM
To: Lipman, Eric (OAH)
Subject: Re: the Hollydale 115 transmission line project

The Honorable Eric L. Lipman

My name is Maria Maag, I live on 16242 50th Ave N. Plymouth, MN 55446

I picked out my lot where I live now in 2003 and bought the townhome Sept 29 2004.

It took me 3 years to find my retirement lot, when I saw there were no powerlines or heavy traffic going through this area.

I was so taken with this place, because all it had is a pond and wildlife around me.

Now after all my savings are put into this place I find out the transmission line project wants to start building power lines.

I am very upset and sad, that this beautiful side of townhomes is going to be destroyed by powerlines.

Please consider other places where you can build.

Thank you for your consideration.

Maria Maag

Debra and Brian Stage
17010 41st Place North
Plymouth, Minnesota 55446

June 4, 2012

The Honorable Eric L. Lipman
Office of Administrative Hearings
P.O. Box 64620, 600 North Robert Street
St. Paul, Minnesota, 55164-0620
Re: Proposed Power Line

Dear Judge Lipman,

We own a home in the Holly Creek development west of Dunkirk Lane and north of Hwy 55 in Plymouth. We want to express our concerns with the Xcel's proposed route of a high-power line which would run along the southern border of our development.

For the record, our position on this issue is the following:

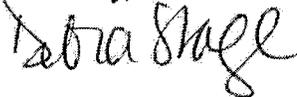
While we acknowledge that increased demand for electrical power drives the need for increased capacity, Transmission lines must be routed to minimize the impact on communities through which they run. To minimize these impacts on Plymouth residents we urgently request that the proposed option designated as Alternate Route Segment C on the attached map be adopted as part of the re-routing plan for the line.

1. This will allow the line to be routed along existing roads.
2. This plan would have a much lower impact on housing developments. We stand to see the value of our homes decrease by up to 40% based on the findings of licensed real estate agents who presented at previous public meetings.
3. The alternative route would not cause the concerns we have regarding the medical consequences of constant exposure to heightened levels of EMF that come with proximity to high-power lines. Based on the studies mentioned at the meeting, the level of EMF output generated by the lines, running that close to homes, would present a risk for increased incidents of a variety of medical conditions that are now known to be associated with power lines. Placement of power lines in earlier times was done without the knowledge of the health impacts on those living nearby. Those impacts were unintentional given the available scientific data at the time. Now, however, with better data to guide them, Xcel would intentionally ignore the health impacts on people living near the lines by placing them as they have proposed.
4. We are concerned with the personal safety of our families knowing there would be increased risk from downed lines as the result of storms, fires, or other hazards from lines that run through the midst of housing developments as opposed to the Alternate Route Segment C which would be along an existing roadway farther from, and affecting fewer, Plymouth residents..

With an available option that lessens these risks considerably, Xcel's primary routing choice is unacceptable to us.

Thank you for your consideration of our concerns. If there is anything else we can do to advocate our position, please let us know.

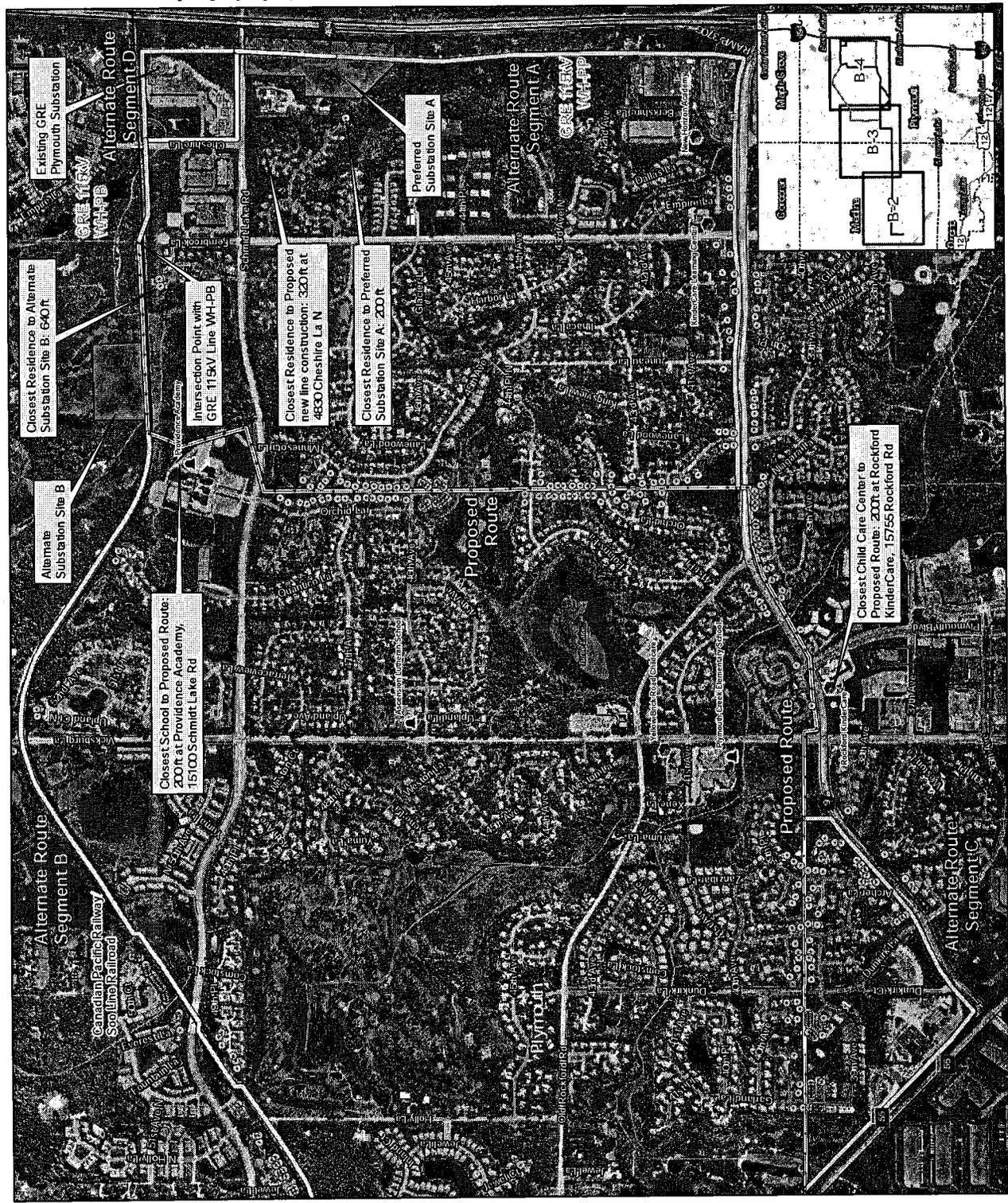
Sincerely,



Debra Stage



Brian Stage



- Existing GRE Substation
- ▭ Municipality
- ▭ Preferred Substation Site A
- ▭ Alternate Substation Site B
- ▭ Canadian Pacific / Soo Line Railroad
- ▭ Proposed Route
- ▭ (Existing Transmission Corridor)
- ▭ Alternate Route Segment A
- ▭ Alternate Route Segment B
- ▭ Alternate Route Segment C
- ▭ Alternate Route Segment D
- Residence within Approximately 200ft of Proposed Route or Alternate Route Segment (Barr, 2010)
- Non-Residential Building within Approximately 200ft of Proposed Route or Alternate Route Segment (Barr, 2010)
- Child Care Center within 1/2 mile of Proposed Route or Alternate Route Segment (Barr, 2010)
- School within 1/2 mile of Proposed Route or Alternate Route Segment (Barr, 2010)
- ▭ Existing Xcel Energy Transmission Line
- ▭ 345KV
- ▭ Existing GRE Transmission Line
- ▭ 69KV
- ▭ 115KV

Data Source: Xcel Energy, GRE, MNDOT, USGS, Aerials Express 2009

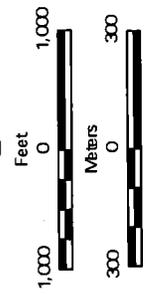


Figure B-4

PROJECT LOCATION -
EAST PORTION OF PROJECT
Hollydale Project



6/7/2012

The Honorable Eric L. Lipman
Office of Administrative Hearings
PO Box 64620, 600 North Robert Street
St. Paul, MN 55164-0620

RECEIVED
12 JUN 11 AM 7:49
ADMINISTRATIVE
HEARINGS

Dear Mr. Lipman,

My wife and I are residents of Plymouth with property immediately adjacent to the current 69 kilovolt Hollydale transmission line that Excel wants to increase to 115kV. This project, as proposed, will cause immediate, substantial, and irreparable harm to our quality of life at that property. I cannot believe that our rights to quiet enjoyment will be preserved when sitting under the hum and hiss of a 115kV power line. We feel betrayed by the mere suggestion that this project will be approved.

The increased size of the towers planned to loom over our house will forever change the appearance of the lot. We ourselves will be unwilling to sit on our deck under those lines and certainly no friends, relatives or other visitors will be foolish enough to do so, nor could we, in good conscience, ask them to. Who would be foolish enough to use the hiking/biking trails immediately underneath those lines, much less play in a backyard under those lines? Power lines like these behemoths simply scare people away, and people should and do fear being near them.

I mentioned betrayal. We are not inexperienced property owners – we have owned homes in four previous states. When we, in 1993, purchased 18825 37th Avenue in Plymouth we were reasonably assured of what the area would be like. The plots were established, the builders known, the neighborhood profile clearly platted. We knew the neighborhood included a 69kV line; we knew the City required recreational investments like our hiking and biking trails when developed; we had reasonable expectations of what the neighborhood would be then and now. Our lot and the free traverse of our neighborhood was why we bought in the suburbs. The planned increase in the size of this transmission line changes everything – our hiking and biking trail will be useless, property values will plummet, most of us will move away from the power lines, the neighborhood will devalue. This is bad for the neighborhood and the community and not something we bargained for.

We didn't raise five children in Plymouth and I didn't survive cancer to spend the rest of my years sitting alone under 115,000 volts. I am confident that the impact these larger lines present can be avoided and that our neighborhoods can be preserved without suffering an increase in transmission voltages. We ask that that another solution be found and that the negative impact to our lives be mitigated.

Thank you for your time and consideration,



Douglas and Karen Nauth

Homeowners at both 18825 37th Avenue (Bridlewood Farm) and 19025 31st Place N. (Churchill Farms)

RECEIVED
12 JUN -4 PM 3:07
ADMINISTRATIVE
HEARINGS

May 31, 2012

The Honorable Eric L. Lipman
Office of Administrative Hearings
P.O. Box 64620, 600 North Robert Street
St. Paul, MN 55164

Re: Hollydale 115KV Transmission Line

Dear Mr. Lipman:

It is our understanding that the proposed route for the Hollydale Line is to follow the existing line adjacent to our properties. We are very much in opposition to this.

It is our understanding that no structure shall be within 35 feet of the line. We have homes very close to that limit. We are also aware that our properties will potentially drop in value.

We have other concerns as well, such as radio interference on AM stations, etc. We would request you approve an alternate route for this project.

We will plan to be at the July 7 or 8 meeting. Thank you for your considerations.

Sincerely,



Kenneth & Elaine Johnson
17930 39th Place North
Plymouth, MN 55446

June 2, 2012

RECEIVED
12 JUN -5 AM 7:08
ADMINISTRATIVE
HEARINGS

The Honorable Eric L. Lipman
Office of Administration Hearings
P.O. Box 64620, 600 North Robert Street
St. Paul, MN 55164-0620

Re: Hollydale 115KV Transmission Line

Dear Mr. Lipman,

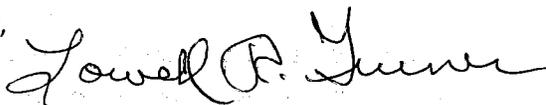
I would like to reiterate my concern about the possibility of building a new power line nearly on my property. After reviewing the new information sent to me, along with the previous information, the proposed power line represents both a health risk to me, personally, but will also devalue all homes to have such a large structure with heavy-duty power lines within just a few feet from our property lines.

More specifically, let me express my biggest concerns:

- A pacemaker manufactured by Medtronic USA, Inc. was implanted with leads to my heart earlier this year. I respectfully request written confirmation that the proposed power line will not pose a health risk to me. Information received from Medtronic including a Table of Maximum Allowable Field Strengths is enclosed for reference.
- If the proposed power line is approved, please confirm exactly where the power poles will be placed. We would like confirmation that the poles would not be placed directly behind any of the homes in our neighborhood or obstruct the views to the ponds and natural wetlands.
- Our home is positioned within 20 feet of the proposed route A. Can the route be changed so that the line would be positioned with the required right-of-way or 37'6" from the centerline of the proposed structure?
- If the route cannot be changed, how will this affect our property? Please clarify what is meant by eminent domain.
- If the proposed power lines are approved, will the current power lines that are placed directly behind our home be removed so that there is only one set of power lines located behind our home?
- Our preference would be that the proposed power lines do not run through any of the neighborhoods.

Most importantly we are concerned about our safety as well as the safety of our neighbors. We sincerely appreciate your attention to this matter.

Respectfully,



Lowell Turner
18130 39th Ave N
Plymouth, MN 55446-6800
(763) 478-6425
e-mail: dleuer@prestonkelly.com



Medtronic

2-14-12-

Medtronic USA, Inc.
Cardiac Rhythm Disease Management
Patient Services – MVS14
8200 Coral Sea St. NE
Mounds View, MN 55112
www.medtronic.com

Dear Patient,

tel 800.551.5544
fax 763.367.5809

Many individuals with a Medtronic implanted heart device (pacemaker or defibrillator) have questions about whether electrical interference from certain electrical tools, appliances, and other equipment will affect their heart device. We are providing this technical information relevant to your Medtronic implanted heart device to help you determine whether you may safely use such equipment, or safely be in an environment where such equipment is in use. There may also be other conditions about your health that may limit how you may use such equipment. Therefore, we encourage you to discuss all related factors with your physician.

Background Information

Medtronic implantable heart devices are designed to operate normally when you are in the majority of work and home environments or while using most electrical tools, appliances or other equipment. While effects are unlikely and are typically temporary, sources for potential effects to the heart device can include:

- “Conducted electric currents” flowing through the body. They are felt as an electrical shock. Sources of conducted electric currents may include:
 - Electrical equipment that is poorly maintained, improperly grounded, or connected to a faulty outlet.
 - Improper electrical safety practices such as working on “live” wires.

Low level current leaks from electrical equipment or improper wiring may be detected by a heart device even when it is not felt by the patient. If a stronger current leak is present, an electric shock from the power source is felt. Conducted currents should be avoided. Your Medtronic heart device is not likely to be damaged or reprogrammed in the event that you do receive a minor electrical shock.

- “Radiated electric/magnetic fields” are invisible energy fields that spread through space. These fields are very common in most environments. Common sources of radiated electromagnetic fields include high-voltage power lines, radio transmission towers, electric motors, cell phones, security gates, or two-way radios.
- “Static magnetic fields” are primarily created by magnets. A static magnetic field is also created around any conductor carrying direct current (DC). Common sources are permanent magnets, DC electromagnets, or certain electric motors.

A Medtronic heart device will operate normally in fields that are below the established field intensity limits. These limits (also referred to as levels of susceptibility) are listed on page 4 of this document. Limits are established by using national and international standards. These standards are developed as a result of collaboration between manufacturers, regulators, and physicians. You should contact your physician if you have exposed your heart device to fields that exceed the recommended limits and are concerned or not feeling well.

Potential Heart Device Interaction

If you are in direct contact with an electric current (conducted current), or if your Medtronic heart

device senses an electromagnetic field that exceeds its established limits, the normal function of the heart device could be affected. The heart device could temporarily 1) withhold therapy that is needed, or 2) deliver therapy that is not needed (for example, a defibrillator could deliver an unnecessary shock). It is unlikely to cause damage or adjustments to the programming (settings) of your Medtronic heart device. Your heart device should return to normal operation after the interference has ceased.

If you feel dizzy, feel rapid or irregular heartbeats, or suspect your heart device is being affected, move away from the source of interference and/or turn the item off. If your symptoms continue or do not improve, contact your doctor.

General Rules

To reduce the risk of permanent or temporary effects to your implanted heart device, we recommend that you:

- Follow all established electrical safety precautions.
- Use battery powered tools, appliances, and equipment when practical.
- Protect yourself from electrical current that may leak from improperly grounded electrical items. Make sure that all electrical items are well maintained and properly grounded to avoid an electrical shock. The use of a ground-fault-interrupt [GFI] outlet is a good safety measure.
- Do not enter an area that has posted warning signs.
- Maintain the minimum distance from certain electrical tools, appliances, and other equipment as mentioned in the patient manual you received with your heart device.
- In some situations it may be best to conduct a worksite survey to measure the fields present in your work environment. Observe the maximum allowable field strengths listed in the table on page 4 of this document. Individuals doing the testing will need to know these maximum allowable field strengths in order to select appropriate test equipment and to map safe distances.

Guidelines

Determining whether you can safely use certain electrical tools, appliances or other equipment, or safely be in an environment where such equipment is in use depends on many factors. It is not possible for Medtronic to know the specific conditions which apply in your specific situation, thus Medtronic can not guarantee our information is applicable to your specific situation. Most items are safe to use, and some should be kept a minimum distance from your heart device. The following guidelines may be referenced for safe use with your implanted heart device and are some of the common questions patients have. You may be able to apply this information to other items or situations you encounter that are not referenced in this letter. Please contact Medtronic Patient Services for further assistance.

Maintain a distance of at least 6 inches between your heart device and:

- ◆ Electric powered and battery powered home and garden equipment such as hedge clippers, leaf blowers, and weed trimmers
- ◆ Electric powered and battery powered tools such as drills, circular saws, routers, sanders, and screwdrivers
- ◆ Electronic Article Surveillance (EAS) towers (located in store entrance/exit). Walk through these areas as you normally would. Do not stand or linger around the detection equipment.
- ◆ Hand-held airport security screening wands
- ◆ Soldering guns

Maintain a distance of at least 12 inches between your heart device and:

- ◆ Car battery chargers of 100 amps or less
- ◆ Portable gas or diesel generators of 20 kW (or 20 kVA) or less
- ◆ Components of gasoline ignition systems as found in gasoline powered tools and equipment including lawn mowers, snow blowers, automobiles, and gasoline/propane/compressed natural gas forklift engines while the motor is running

Maintain a distance of at least 2 feet between your heart device and:

- ◆ Electric motors that are up to 400 horsepower including those associated with bench mounted tools, air compressors, and electric powered forklifts while the motor is running
- ◆ Jumper cables (at the moment the vehicle is being started)
- ◆ Electronic Article Surveillance (EAS) deactivators (located at the registers in stores usually by the price scanners).

Radio Equipment - Determining a safe distance from the antenna of a radio transmitter depends on many factors such as transmitter power, frequency and the antenna type. The following guidelines are suggestions for safe use of radio equipment. However, if the antenna transmits in a very directional pattern, it may be necessary to maintain a farther distance from the antenna at the strongest part of the pattern.

Maintain a distance of at least 6 inches between your heart device and:

- ◆ Antennas of cellular phones, amateur radios, ham radios, walkie talkies of 3 watts or less.

Maintain a distance of at least 12 inches between your heart device and:

- ◆ Antennas of amateur radios, ham radios, marine radios, walkie talkies, citizens band (CB), of 3-15 watts

Maintain a distance of at least 2 feet between your heart device and:

- ◆ Antennas of amateur radios, ham radios, marine radios, walkie talkies of 15-30 watts

Maintain a distance of at least 3 feet between your heart device and:

- ◆ Antennas of commercial and government dispatch radio equipment of 30-50 watts

Maintain a distance of at least 6 feet between your heart device and:

- ◆ Antennas of commercial and government dispatch radio equipment of 50-125 watts

Additional Notes

- ◆ Diesel engines with mechanical injectors do not affect an implanted heart device. There are no distance precautions to maintain as they do not have an electrical ignition system.
- ◆ The use of chainsaws and welding equipment is not recommended. If required to use, you may obtain guidelines to help make these activities safer by going to our website, www.medtronic.com, or by contacting Medtronic Patient Services for guidelines (800-551-5544 x41835).
- ◆ Locations in power plants can exceed the field intensity limits and may be discussed with the plant's safety officer. Typical locations may be:
 - in the immediate vicinity of the generators (which is normally fenced off)
 - in the areas around the main power bus or transmission lines (which is normally fenced off)
 - in the area near the large pump motors associated with the turbines
 - in the area near the large positive draft motors associated with conventional power plants
 - below the transmission lines leaving a substation (which is normally fenced off)

Lastly, while Medtronic is not in a position to provide on-site environmental testing, we can serve as a resource for your physician, site surveyor, or employer to help determine the level of site evaluation or testing that may be required. Medtronic is available to assist in reviewing the results of a site survey. The decision to return to work is one that must be made by the patient, employer, and physician. We are also available to discuss any other device-related questions you may have. If we can provide further assistance, we invite you to contact us.

Regards,

CRDM Patient Services Department
Medtronic USA, Inc.
800-551-5544, ext. 41835

2-14-12

Table of Maximum Allowable Field Strengths

In cases where a worksite is being evaluated for actual leakage currents and fields, the following table lists the maximum allowable field strengths for Medtronic heart devices:

Electromagnetic Source	Maximum Allowable Field Strength
Electric Field – 50/60 Hz AC Power Frequency Sources such as: power lines, electric service panels, transformers, power plants, electrical substations	Medtronic pacemakers/defibrillators are designed to operate normally in electric fields measuring: 6,000 volts per meter
Electric Field - High Frequency 150 kHz and up Radio Frequency (RF) Sources such as: radio transmitter antennas, television transmitter antennas, cellular telephone antennas, RF welding equipment, dielectric heaters, radar	Medtronic pacemakers/defibrillators are designed to operate normally in electric fields measuring: 100 volts per meter Note: Medtronic pacemakers and defibrillators are designed to operate normally within RF levels that meet the government Maximum Permissible Exposure (MPE) limits.
Modulated Magnetic Field – 50/60 Hz AC Power Frequency Sources such as: motors, generators, transformers, metal detectors, store security gates, AC/DC welding equipment, and power tools	Medtronic pacemakers/defibrillators are designed to operate normally in modulated magnetic fields: 1 gauss (or <0.1 millitesla or <80 amps per meter) for frequencies up to 10 kilohertz (kHz)
Modulated Magnetic Field - High Frequencies above 10kHz Sources such as: radio transmitter antennas, television transmitter antennas, cellular telephone antennas, RF welding equipment, dielectric heaters, radar	Medtronic pacemakers/defibrillators are designed to operate normally in modulated magnetic fields: 1 amp per meter (or <12.5 milligauss) for frequencies greater than 10 kilohertz (kHz)
Static Magnetic Field (DC) Sources such as: permanent magnets, DC electromagnets, battery powered tools, DC welding equipment, uninterrupted power supply equipment	Medtronic pacemakers/defibrillators are designed to operate normally in static magnetic fields measuring: 5 gauss

Measuring an Electromagnetic Field

A survey or measurement of the electromagnetic fields around a source or in a work area can identify the strength of a field. Various meters can be used to survey a field, such as:

1. An extremely low frequency (ELF) meter – measures the AC electric fields at power frequency 50 Hz/60Hz
2. A radio frequency (RF) meter - measures high frequency electric fields of radio and microwave fields
3. A gauss meter - measures AC and/or DC magnetic field strengths
4. An extremely low frequency (ELF) gauss meter – measures AC magnetic field strengths at power frequencies of 50Hz/60 Hz/400Hz

In some cases, a doctor may arrange for a heart device patient to wear an ambulatory heart monitor as a means to assess his/her heart activity while in their work environment.

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12 JUN -5 AM 11 37
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June 2, 2012

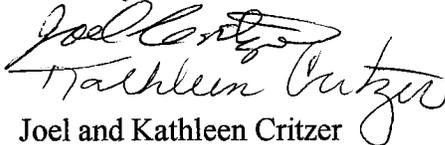
The Honorable Eric L. Lipman
Office of Administrative Hearings
P.O. Box 64620, 600 North Robert Street
St. Paul, MN 55164

Re: Hollydale 115KV Transmission Line

Dear Honorable Lipman:

We understand that the Hollydale proposed Line is to follow the existing line that is very close to our property. For some property owners, this is even closer than ours. We have other concerns as well, such as our property values, and possible health concerns. We would like to express our opposition to this plan. We would request you approve an alternate route for this project. Thank you for your consideration.

Sincerely



Joel and Kathleen Critzer
18095 39th Place N.
Plymouth, MN 55446

June 8, 2012

RECEIVED
12 JUN - 8 AM 7:42
ADMINISTRATIVE
HEARINGS

**The Honorable Eric L. Lipman
Office of Administrative Hearings
P.O. Box 64620, 600 North Robert Street
St. Paul, Minnesota, 55164-0620**

Re: Hollydale 115 KV Transmission Line

Dear Mr. Lipman,

I am writing to ask your help in preventing Xcel Energy from using the Hollydale Line to increase the current capacity from 69KV to 115 KV.

We are all aware of other proposed routes that could be implemented which would greatly reduce the negative economic and environmental impact of this project to our communities.

The obvious concerns that we who live in this highly populated impacted area are property devaluation, EMF, noise, aesthetics, health issues, and many others.

We would not have purchased our home in Walnut Grove Pond if this project had been in place at that time in 2006. Just imagine the decline in our home values and the reduced desirability of our community based on this project going forward. We even have three or four homes that may have to be removed because of this. Shame on Excel!!

Please work with our elected officials to put an end to this proposal.

With great appreciation for your services, many thanks.

**William K. Whitmore
18110 39th. Ave. No.
Plymouth, MN. 55446
Ph. 763-478-3506**



May 30, 2012

The Honorable Eric L. Lipman
Office of Administrative Hearings
P. O. Box 64620, 600 North Robert Street
St. Paul, MN 55164

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12 JUN -4 PM 7:48
ADMINISTRATIVE
HEARINGS

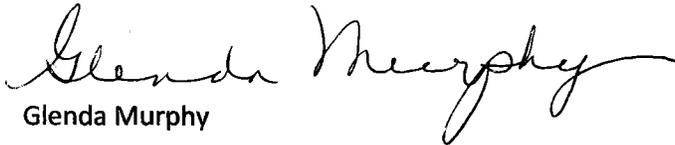
Re: Hollydale 115KV Transmission Line

Dear Mr. Lipman:

We understand the proposed route for the Hollydale Line is to follow the existing line adjacent to our property. It is our understanding that no structure shall be within 35 feet of the line. Our home is very close to that limit. We have also been told this may impact the value of our property. We are requesting that you approve an alternate route for this project.

Thank you for your consideration of our request.

Sincerely,



Glenda Murphy

17935 39th Place North

Plymouth, MN 55446

Cell: (612) 940-0863



Michael Murphy

17935 39th Place North

Plymouth, MN 55446

Cell: (612) 308-5691

Mr. Stuart M. Lasky

18025 39th Place North

Plymouth, MN 55446

(763) 478-8145

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12 JUN -6 AM 11:02

ADMINISTRATIVE
HEARINGS

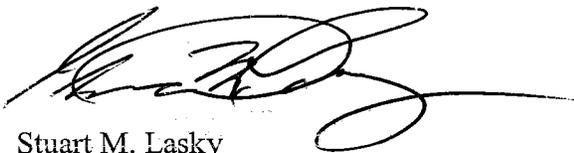
May 30, 2012

The Honorable Eric L. Lipman
Office of Administrative Hearings
P.O. Box 64620
600 North Robert Street
St. Paul, MN 55164

Dear Mr. Lipman:

It is my understanding that the proposed route for the *Hollydale Power Line* is to follow the existing line which is adjacent/very close to my property. As a result, I wish to express my strong opposition to this route. Since no structure should be within 35 feet of the line and my home is extremely close to that limit, I am very concerned that the *Hollydale Line* will have a serious negative impact on the value of my home and property. Given the state of the housing market, we need to hold on to every dollar of value we can. Therefore, I implore you to approve an alternative route for this project. Thank you.

Very truly yours,



Stuart M. Lasky
Homeowner

Ms. Debbie L. Tucker

18025 39th Place North
Plymouth, MN 55446
(763) 478-8145

RECEIVED
12 JUN -4 AM 11:01
ADMINISTRATIVE
HEARINGS

May 30, 2012

The Honorable Eric L. Lipman
Office of Administrative Hearings
P.O. Box 64620
600 North Robert Street
St. Paul, MN 55164

Dear Mr. Lipman:

It is my understanding that the proposed route for the *Hollydale Power Line* is to follow the existing line which is adjacent/very close to my property. As a result, I wish to express my strong opposition to this route. Since no structure should be within 35 feet of the line and my home is extremely close to that limit, I am very concerned that the *Hollydale Line* will have a serious negative impact on the value of my home and property. Given the state of the housing market, we need to hold on to every dollar of value we can. Therefore, I implore you to approve an alternative route for this project. Thank you.

Very truly yours,



Debbie Tucker
Homeowner

18120 39th Avenue N.
Plymouth, Minnesota
55446 USA

.....
Barry J. Altman

May 29, 2012

The Honorable Eric L. Lipman
Office of Administrative Hearings
P.O. Box 64620
600 North Robert Street
St. Paul, MN 55164-0620

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12 MAY 31 AM 7:41
ADMINISTRATIVE
HEARINGS

Dear Mr. Lipman:

I wish to express my concerns regarding this project.

Currently, there is a 69Kv Transmission Line approximately 20' from my house. The existing easement is 33' from centerline. While this distance is unusually short, it did not affect the placement of my house. The new proposed easement ranges from 37' to 200' from centerline, depending on what material is being read.

I wish to know the specific plans Excel Energy has for accommodating the close proximity of my home and the new proposed power line.

Further, I wish to have some solid scientific evidence that states that a 115Kv line, 20' from my home will not cause any health risks and the electromagnetic fields generated will not adversely affect our personal electronics and our Federally licensed radio transmitters and receivers.

Alternatively, since the 69Kv line already exists, why doesn't Excel energy utilize the existing line and bring another 69Kv line to their substation utilizing a less disruptive or possibly underground route.

If it is inevitable that this project goes through, I wish to state for the record now, that the transmission tower immediately to the West of my property, be moved North, midway between our development, Walnut Grove Ponds, and our neighbors to the North, The Orchards, to increase the distance of the power lines to our homes.

Respectfully,



Barry J. Altman

☎ 1-763-478-4770

☒ 1-202-207-0403

baltman@beta-tech.us

.....

May 30, 2012

The Honorable Eric L. Lipman
Office of Administrative Hearings
P.O.Box 64620, 600 North Robert Street
St.Paul, Minnesota 55164-0620

Re:Hollydale 115KV Transmission Line

Dear Mr. Lipman.

We Live at 18130 39th Avenue North which is 20 feet from the existing power line. I wear a Medtronic pace maker which would be affected by a power line of this magnetude. My understanding is that no structure should be within 35 feet of the line.

We are hoping that an alternate route will be approved.

I will attend the meeting at Wayzata High School on June 7.

Sincerely,



Lowell Turner
18130 39th Ave. N.
Plymouth, MN 55446-6800
Ph.763-478-6425

Enclosure: Information from Medtronics

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12 MAY 31 AM 7:09
ADMINISTRATIVE
HEARINGS

Maintain a distance of at least 2 feet between your heart device and:

- ◆ Electric motors that are up to 400 horsepower including those associated with bench mounted tools, air compressors, and electric powered forklifts while the motor is running
- ◆ Jumper cables (at the moment the vehicle is being started)
- ◆ Electronic Article Surveillance (EAS) deactivators (located at the registers in stores usually by the price scanners).

Radio Equipment - Determining a safe distance from the antenna of a radio transmitter depends on many factors such as transmitter power, frequency and the antenna type. The following guidelines are suggestions for safe use of radio equipment. However, if the antenna transmits in a very directional pattern, it may be necessary to maintain a farther distance from the antenna at the strongest part of the pattern.

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Maintain a distance of at least 12 inches between your heart device and:

- ◆ Antennas of amateur radios, ham radios, marine radios, walkie talkies, citizens band (CB), of 3-15 watts

Maintain a distance of at least 2 feet between your heart device and:

- ◆ Antennas of amateur radios, ham radios, marine radios, walkie talkies of 15-30 watts

Maintain a distance of at least 3 feet between your heart device and:

- ◆ Antennas of commercial and government dispatch radio equipment of 30-50 watts

Maintain a distance of at least 6 feet between your heart device and:

- ◆ Antennas of commercial and government dispatch radio equipment of 50-125 watts

Additional Notes

- ◆ Diesel engines with mechanical injectors do not affect an implanted heart device. There are no distance precautions to maintain as they do not have an electrical ignition system.
- ◆ The use of chainsaws and welding equipment is not recommended. If required to use, you may obtain guidelines to help make these activities safer by going to our website, www.medtronic.com, or by contacting Medtronic Patient Services for guidelines (800-551-5544 x41835).
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 - below the transmission lines leaving a substation (which is normally fenced off)

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Regards,

CRDM Patient Services Department
Medtronic USA, Inc.
800-551-5544, ext. 41835

May 25, 2012

RECEIVED
12 MAY 29 AM 11 47
ADMINISTRATIVE
HEARINGS

The Honorable Eric L. Lipman
Office of Administrative Hearings
P.O. Box 64620, 600 North Robert Street
St. Paul Minnesota, 55164-0620

Re: Hollydale 115 KV Transmission Line

Dear Mr. Lipman,

It is my understanding that the proposed route for the Hollydale Line is to follow the existing line adjacent to our properties. We are very much in opposition to this. My understanding is that no structure shall be within 35 feet of the line. We have two homes at 18120 39th Ave N. and 18130 39th Ave N. which are 20 feet from the existing line. I have a row of beautiful mature Black Walnut Trees which are 20 feet from the line. Several of our other homeowners will also be affected.

We are hoping that an alternate route will be approved.

I will attend the meeting at Wayzata High School on June 7.

Sincerely,



Verne Palmberg
18140 39th Ave. N.
Plymouth MN 55446-6800
Ph. 763-478-6280