



414 Nicollet Mall
Minneapolis, Minnesota 55401

February 27, 2012

VIA ELECTRONIC FILING

Dr. Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
350 Metro Square Building
121 Seventh Place East
St. Paul, MN 55101

**Re: In the Matter of the Application of Northern States Power Company, a Minnesota corporation, and Great River Energy, a not-for-profit cooperative, for a Route Permit for the Hollydale 115 kV Transmission Line Project in the Cities of Plymouth and Medina, Hennepin County, Minnesota
PUC Docket No. E002/TL-11-152**

Dear Dr. Haar:

Northern States Power Company, a Minnesota corporation (“Xcel Energy”) and Great River Energy, a not-for-profit cooperative (collectively, the “Applicants”) are electronically filing the enclosed Petition to Convert the Route Permit Proceeding from an Alternative Permitting Process to a Full Permitting Process.

Please call me at 612-330-6435 if you have any questions regarding this filing.

Sincerely,

s/ Joseph G. Sedarski

Joseph G. Sedarski

Enclosures
cc: Service List

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

Phyllis Reha	Vice Chair
David Boyd	Commissioner
J. Dennis O'Brien	Commissioner
Betsy Wergin	Commissioner

IN THE MATTER OF THE APPLICATION OF
NORTHERN STATES POWER COMPANY, A
MINNESOTA CORPORATION, AND GREAT
RIVER ENERGY, A NOT-FOR-PROFIT
COOPERATIVE, FOR A ROUTE PERMIT FOR
THE HOLLYDALE 115 kV TRANSMISSION
LINE PROJECT IN THE CITIES OF
PLYMOUTH AND MEDINA, HENNEPIN
COUNTY, MINNESOTA

MPUC Docket No. E002/TL-152

**PETITION TO CONVERT ROUTE
PERMIT PROCEEDING FROM AN
ALTERNATIVE PERMITTING PROCESS
TO A FULL PERMITTING PROCESS**

I. INTRODUCTION

Northern States Power Company, a Minnesota corporation (“Xcel Energy”), and Great River Energy, a not-for-profit cooperative (“GRE”) (collectively, “Applicants”) respectfully submit this Petition to the Minnesota Public Utilities Commission (“Commission”) requesting that the Commission convert the pending route permit proceeding for the Hollydale Project from the alternative permitting process to the full permitting process as requested by certain landowners within the project area.

II. DISCUSSION

The Hollydale Project consists of rebuilding approximately 8 miles of existing 69 kilovolt (“kV”) transmission line to 115 kV capacity along existing right-of-way, constructing approximately 0.8 miles of new 115 kV transmission line, constructing a new 115 kV substation (Pomerleau Lake Substation) at Applicants’ preferred Substation Site A, and modifying associated transmission facilities located in the cities of Medina and Plymouth, Hennepin County, Minnesota (“Project”). The Project is needed to provide increased distribution capacity and avoid feeder circuit overloads in the Plymouth area distribution delivery system. This includes increased distribution capacity in the Plymouth and Medina areas to better serve current customers and expected load growth. Additionally, system reliability will be enhanced by supplying the existing Hollydale Substation with a redundant 115 kV connection.

On June 30, 2011, Applicants filed a route permit application (the “Application”) for the Project under the alternative permitting process prescribed by Minnesota Rules 7850.2800 to 7850.3900. The Project is eligible for the alternative permitting process as it involves a high voltage transmission line between 100 kV and 200 kV.¹

On February 6, 2012, landowners from Plymouth filed a petition with the Commission, requesting that either the full permitting process be utilized for this proceeding or that the alternative process be extended to provide greater opportunities for public participation (“Plymouth Petition”).² On February 13, 2012, a petition signed by 763 landowners from Plymouth and Medina was filed requesting: (1) conversion to the full permitting process, (2) preparation of an Environmental Impact Statement (“EIS”), (3) that a contested case hearing be held, (4) that the route permit require specific electric and magnetic field (“EMF”) mitigation measures, and (5) that a Certificate of Need be generated (“Plymouth/Medina Petition”).³

Prior to and after submitting the Application, Applicants have sought to facilitate landowner and stakeholder involvement. Before filing the Application, Applicants hosted two public outreach meetings to answer questions and gather comments on the Project. Applicants utilized the comments and concerns expressed during these outreach meetings to develop alternative routes to be considered in the Application. During this proceeding, Applicants have also responded to numerous landowner questions and comments via telephone conferences, email, and written correspondence. Some of Applicants’ responses to landowner questions have been e-filed to this docket so that other interested parties can view these responses.⁴ Applicants have also met with individual landowners on several occasions to address specific concerns.

While the alternative permitting process is adequate for record development, based upon the level of interest in this Project and the recent landowner petitions, Applicants support converting this proceeding to the full permitting process. Applicants believe that converting the proceeding to a full permitting process at this stage and moving forward would provide even greater opportunities for landowner and stakeholder participation. As requested by the Plymouth Petition and Plymouth/Medina Petition, the full permitting process allows for a contested case proceeding, with the opportunity for parties to intervene and submit testimony on

¹ Minn. Stat. § 216E.04, subd. 2(3); Minn. R. 7850.2800, subp. 1(C).

² Plymouth Petition, eDocket Document No. 20122-71234-01.

³ Plymouth/Medina Petition, eDocket Document No. 20122-71474-01, 20122-71474-03, 20122-71474-05, and 20122-71474-07. Applicants note that they have filed a Notice Plan and Exemption Request in the event that a Certificate of Need is required for this Project. *See* Docket No. 12-113.

⁴ *See* eDocket Document Nos. 20122-71170-01 and 20118-65077-01.

disputed factual issues.⁵ The full permitting process also includes the preparation of an Environmental Impact Statement (“EIS”), which was requested by the Plymouth/Medina Petition, and an additional public hearing on the draft EIS.⁶ The increased opportunity for landowner and stakeholder participation within the full permitting process will provide a more complete record for the Commission to consider when making its route determination for this Project.⁷

Given that the Project is still in the initial stages of review, Applicants believe that converting to the full permitting process can be done at this point in the proceeding based on all of the information already in the docket and without the necessity of repeating steps already undertaken. As an initial matter, the Application includes all of the information required for the full permitting process because it contains data for the proposed route as well as data for several route alternatives.⁸ The reason for the Applicants’ identification of the proposed route as the preferred route is also stated in the Application.⁹ The Department of Commerce Energy Facility Permitting staff (“EFP”) has also completed a robust scoping process for the Project that resulted in 26 routes being included in the Scoping Decision for the Environmental Assessment for the Project. In fact, in the Scoping Decision EFP staff included all alternative routes that were proposed by stakeholders during the EA scoping process. This same exhaustive Scoping Decision can be used to guide development of an EIS.

III. CONCLUSION

Applicants appreciate that this Project has garnered considerable landowner and stakeholder interest and Applicants support converting to the full permitting process. Therefore, Applicants respectfully request that the Commission order that this proceeding be converted to a full permitting process and expeditiously issue a notice of hearing referring this matter to the Office of Administrative Hearings for a contested case proceeding under the full permitting process.¹⁰

⁵ Minn. R. 7850.2600; Minn. R. 1405.0900.

⁶ Minn. 7850.2500.

⁷ The Plymouth/Medina Petition also requests that the route permit include specific EMF mitigation measures. This issue will be addressed during the route permit proceeding.

⁸ The only difference between the content requirements is that under the alternative review process, an applicant need not propose any alternative routes to the preferred route. Minn. R. 7850.3100.

⁹ Minn. R. 7850.1800, Subp. 2(C).

¹⁰ Minn. R. 1405.0500.

Dated: February 27, 2012

Respectfully submitted,

Northern States Power Company, a Minnesota corporation

By: /s/ Joseph Sedarski

Joseph Sedarski

Senior Permitting Analyst

Great River Energy, a not-for-profit cooperative

By: /s/ Marsha Parlow

Marsha Parlow

Transmission Permitting Analyst

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**IN THE MATTER OF THE APPLICATION OF
NORTHERN STATES POWER COMPANY, A
MINNESOTA CORPORATION (“XCEL ENERGY”)
AND GREAT RIVER ENERGY FOR A ROUTE
PERMIT FOR THE HOLLYDALE PROJECT**

**CERTIFICATE OF SERVICE
MPUC Docket No. E002/TL-11-152**

Val Herring certifies that on the 27th day of February, 2012, she filed a true and correct copy of **Petition to Convert the Route Permit Proceeding from an Alternative Permitting Process to a Full Permitting Process** by posting the same on www.edockets.state.mn.us. Said Petition has also served via U.S. Mail or e-mail as designated on the Official Service List on file with the Minnesota Public Utilities Commission in the above-referenced docket.

/s/ Val Herring
Val Herring

Service List Member Information

Electronic Service Member(s)

Last Name	First Name	Email	Company Name	Delivery Method	View Trade Secret
Agrimonti	Lisa	lagrimonti@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
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
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.ecf@ag.state.mn.us	Office of the Attorney General-RUD	Electronic Service	Yes
Parlow	Marsha	mparlow@greenergy.com	Great River Energy	Electronic Service	No
Sedarski	Joseph G.	joseph.g.sedarski@xcelenergy.com	Xcel Energy	Electronic Service	No