

Certificate of Need Application  
Hollydale 115 kV Transmission Line Project  
Plymouth and Medina, Minnesota  
PUC Docket E-002, ET-2/CN-12-113

Late-Filed Comments

Comments received after the comment deadline of 4:30 pm, November 16, 2012

## Senator Terri Bonoff

Senate District 43  
State Office Building, Room 133  
100 Rev. Dr. Martin Luther King Jr. Blvd.  
St. Paul, MN 55155-1206



Suzanne Steinhauer  
State Permit Manager  
Minnesota Department of Commerce  
85 7th Place East, Suite 500  
St. Paul, Minnesota, 55101-2198

RE: In the Matter of the Application of Northern States Power doing business as Xcel Energy, and Great River Energy for a Certificate of Need and Route Permit Application for the Hollydale 115 kV Transmission Line Project in the Cities of Medina and Plymouth  
Docket Nos. E-002/TL-11-152 and E002, ET2/CN-12-113

Dear. Ms. Steinhauer:

I currently represent District 43 in the Minnesota Senate, which includes much of Plymouth. Beginning in January, I will represent District 44, which will then include additional sections of northern and western Plymouth.

As I was knocking on doors and talking with Plymouth residents during the interim, I heard from hundreds of constituents about their concerns regarding the proposed Hollydale 115 kV high voltage transmission line project. The people in my community are concerned about the public health risks, the potential property devaluation and the aesthetic harm this proposal brings to their neighborhoods. I spoke of all this during the public hearings that took place late October in Plymouth. I was joined by 150 attendees, many of whom spoke quite eloquently, bringing the aforementioned concerns to light. In addition, they specifically identified the Xcel proposal identified as "2A" as an alternative distribution solution to the proposed transmission line. It was said that a high voltage transmission line is not needed to solve local energy distribution problems, that this solution causes greater harm to neighborhood property values and aesthetics, and that it creates greater risks than a lower voltage distribution system solution. They also said that the route chosen by the utilities did not consider the best way to avoid homes and would place a 115 kV power line very close to hundreds of families.

Given the controversial nature of this project, and given that it is detrimental to so many members of my community, I am requesting that the Public Utilities Commission explore all reasonable alternatives before proceeding with the current 115kV High Voltage Transmission Line proposal. Only a full fact-finding hearing will allow the PUC to determine whether there are other alternatives that can provide reliable energy with less harm to the community.

In the event that the result of the contested case hearing leads to a finding that there is no feasible and prudent alternative other than a 115kV high voltage transmission line, I would ask that the Commission consider under-grounding the portion of the line that has direct impact on homeowners. The aftermath of Hurricane Sandy leaves us all with a keen sense of just how vulnerable and antiquated our grid truly is. Under-grounding this portion of the route may be in fact the best solution not only for this problem but for the overall security of our energy needs.

Finally, I have requested that Commissioner Rothman follow this closely given the outpouring of concern expressed by my community.

Thank you for your consideration of my requests.

Sincerely,

A handwritten signature in cursive script that reads "Terri Bonoff".

Senator Terri Bonoff

**From:** [Janet B. C.](#)  
**To:** [Steinhauer, Suzanne \(COMM\)](#)  
**Subject:** PUC Docket No. CN-12-113  
**Date:** Friday, November 16, 2012 9:35:07 PM  
**Attachments:** [2012-11-16 letter for PUC CN-12-113.doc](#)

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Also see same letter attached

Suzanne Steinhauer  
State Permit Manager  
85 - 7th Place East, Suite 500  
St. Paul, Minnesota, 55101-2198

Dear Ms Steinhauer:

I am a homeowner in Holly Creek Townhomes in Plymouth. I am concerned about the Certificate of Need for the Hollydale 115kV HVTL, PUC Docket No. CN-12-113.

Please consider the following points:

- a. **Require Xcel to prove it has re-calculated need based on the most current demand projections as of November 2012.** November 2, 2012 a Star Tribune news article covering Xcel's request to increase rates stated, "...No. 2 reason is that electricity sales have fallen nearly 4 percent since its 2011 rate hike." A similar story about Great River Energy(GRE), which owns the route Xcel is seeking to upgrade, stated, "...the cooperative forecasts only a 1.2 percent annual growth in peak demand over the next 15 years, compared with annual growth rates of 2 to 3 percent in the past..." (Star Tribune on-line, 11/3/2012). The demand for electricity has decreased since Xcel initiated this project. **A certificate of need should not be based on out-of-date data.**
  
- b. **The 115kV line on 70-90 foot metal poles would create a new precedent in Plymouth residential neighborhoods.** The original Application asserts that the "Existing transmission lines are common throughout the viewshed of the Project area." (Section 6.2.6, p. 87). This statement is misleading and inaccurate. The CON Application skirts the issue saying, "The visual effect will depend largely on the perceptions of the observers." (pg 135-6) The City of Plymouth in City Code 735.01, states that it wants to eliminate over head wires, acknowledging that it does not control lines of 15,000 volts or more. Our association and a large portion of the middle of Plymouth where this line would be routed have all lines underground. This undergrounding added additional cost to the homes in this area. This was done despite

the 69kV line above ground. The existing 69kV line is an anomaly not a precedent. Existing transmission lines on metal poles follow major roads or railroad right-of-ways in Plymouth; they do not dissect neighborhoods between homes. The exception is a 115kV line on wooden H poles south of Hwy 55 that eventually runs south on Hwy 101. However, those are short wooden poles, further from homes, along a wide right-of-way that allows for trees to camouflage the poles. There are no 115kV metal poles between homes in Plymouth.

We implore you look closely at other public comments that have viable alternatives.

Thank you.

Sincerely,

Janet B. Clarke  
Plymouth, MN

Suzanne Steinhauer  
State Permit Manager  
85 - 7th Place East, Suite 500  
St. Paul, Minnesota, 55101-2198

Dear Ms Steinhauer:

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Please consider the following points:

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- b. **The 115kV line on 70-90 foot metal poles would create a new precedent in Plymouth residential neighborhoods.** The original Application asserts that the "Existing transmission lines are common throughout the viewshed of the Project area." (Section 6.2.6, p. 87). This statement is misleading and inaccurate. The CON Application skirts the issue saying, "The visual effect will depend largely on the perceptions of the observers." (pg 135-6) The City of Plymouth in City Code 735.01, states that it wants to eliminate over head wires, acknowledging that it does not control lines of 15,000 volts or more. Our association and a large portion of the middle of Plymouth where this line would be routed have all lines underground. This undergrounding added additional cost to the homes in this area. This was done despite the 69kV line above ground. The existing 69kV line is an anomaly not a precedent. Existing transmission lines on metal poles follow major roads or railroad right-of-ways in Plymouth; they do not dissect neighborhoods between homes. The exception is a 115kV line on wooden H poles south of Hwy 55 that eventually runs south on Hwy 101. However, those are short wooden poles, further from homes, along a wide right-of-way that allows for trees to camouflage the poles. There are no 115kV metal poles between homes in Plymouth.

We implore you look closely at other public comments that have viable alternatives.

Thank you.

Sincerely,

Janet B. Clarke  
Plymouth, MN

**From:** [Udai Raj](#)  
**To:** [Steinhauer, Suzanne \(COMM\)](#)  
**Subject:** PUC Docket No. CN-12-113  
**Date:** Friday, November 16, 2012 5:09:35 PM

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Dear Ms. Steinhauer:

I am a homeowner in Holly Creek Townhomes in Plymouth. I am very concerned about the Certificate of Need (CON) for the Hollydale 115kV HVTL, PUC Docket No. CN-12-113.

Please require Xcel to prove it has re-calculated need based on the most current demand projections as of November 2012. News stories in the Star Tribune on Nov. 2 and Nov. 9, 2012 indicate that demand has fallen in the last several years since Xcel filed their original request. A certificate of need should not be based on out-of-date data.

I am also concerned with aesthetics and setting precedents. The original route chosen for the 69kV line was not regulated by the city or state because of the lower voltage. The line was installed before any of the current housing developments were built. Saying this unregulated route sets a precedent for upgrading to a regulated route is unreasonable in this case.

No neighborhoods in Plymouth have 115 kV 70-90 foot metal transmission poles between homes. This is a new, dramatic and unnecessary precedent to set in Plymouth. The current precedent in Plymouth is that metal transmission poles are relegated to railroad right-of-ways or major highways. Highway routes are available. Because this is a contested case, Xcel needs to justify why it should set this new precedent, beyond the convenience of using an existing route.

We trust that you will consider all the public comments submitted and help to find a reasonable resolution. Thank you.

Sincerely,

Udai Dommaraju

Sangeetha Balasubramanyam

Address

3925 Everest Lane N

Plymouth MN 55446