

From: [Laura Lawrence](#)
To: [Steinhauer, Suzanne \(COMM\)](#)
Subject: PUC Docket No. CN-12-113
Date: Monday, November 12, 2012 10:45:41 PM

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 A certificate of need should not be based on out-of-date data.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 purchased my town home with a de-energized line in hopes that my son would have a small yard to play in. There is no park within walking distance, and I am a working single mother who needs a yard available for my very active 6-year-old son. We already have no front yard to speak of since I don't want my son playing close to the access case for the buried utilities or the street.

I am very concerned about my son's health if this new 115 kV line is going to be put in our backyard. Not only would my son be playing outdoors underneath this new line, but we have a second level bedroom that would also back right up to it. I already have a family history of cancer, which includes two sisters. I have found information that indicates that an increased electromagnetic field can increase the risk of childhood leukemia. My home and yard would average out to more than 3 mG exposure, which increases the health risks for my son. In addition to the childhood leukemia, an increased electromagnetic field could result in additional sleep issues.

My home value is significantly less compared to when I purchased it, so selling at this time is not an option for me. That is why I am writing this note to request your help and to please use the alternative path available along highways 55 and 494. Please keep our neighborhood a place where we know our children aren't being exposed to unnecessary risks and can remain healthy and safe.

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

Sincerely,
Laura Lawrence
17028 39th Ct N
Plymouth, MN 55446

From: [Madeleine Linck](#)
To: [Steinhauer, Suzanne \(COMM\)](#)
Cc: raelynn.asah@excelenergy.com
Subject: Hollydale Project
Date: Sunday, November 04, 2012 1:04:28 PM

Hello,

We have a few comments to submit about the proposed Hollydale Project since we were unable to attend the recent meeting at Plymouth Creek Center. We live quite close to one of the proposed routes for the upgrade.

We understand that increased development requires additional energy (although we personally live in a small house and require minimal energy which we obtain through Wright Hennepin Cooperative), but we would like to see that alternative measures are looked at that might lessen the impact on neighborhoods.

Upgraded power lines should be kept to the larger, more highly traveled county roads or state highways as much as possible. Going through smaller neighborhoods as in Medina should be avoided, even it means higher costs which could be passed on to consumers. Perhaps there is a way to purchase additional easements from other already existing utilities. While burying lines underground is expensive, there might be some landowners willing to bear the additional costs to keep their neighborhoods free of such high voltage lines. Certainly power lines are buried in certain subdivisions within Minnesota and within development in Europe. Larger homes and developments that use more electricity should be required to pay more cost for energy.

Would it not be possible for a large store such as Target on Highway 55 in Medina to invest in its own generator to alleviate its occasional power shortages rather than disrupt neighborhoods? Certainly other businesses along that corridor could be approached.

As a society, we should be looking at creative ways to reduce our energy use and its impact. Upgraded lines will mean more people, senior housing units and businesses will simply keep using more power rather than conserving or considering alternative power sources such as wind or solar.

We are very much opposed to running such large upgraded power lines along Morgan and Medina roads in Medina even if easements have been in place prior to development. Several of our neighbors feel strongly the same way. No doubt any neighborhood would be opposed, but larger county roads would be more appropriate even with higher costs.

Thank you for considering our comments.

Sincerely,

Madeleine and Richard Linck
1762 Morgan Rd.
Long Lake (Medina) 55356
madeleine.linck@gmail.com

From: [Nate Lukecart](#)
To: [Steinhauer, Suzanne \(COMM\)](#)
Subject: PUC Docket No. CN-12-113
Date: Thursday, November 15, 2012 12:20:53 PM

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,

Nathan Lukecart

From: [Nate Lukecart](#)
To: [Steinhauer, Suzanne \(COMM\)](#)
Subject: PUC Docket No. CN-12-113
Date: Friday, November 16, 2012 9:49:13 AM

Dear Ms. Steinhauer:

My family lives in the 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. Below are some questions and comments that I would like to be considered in the ER.

1. Impact to property values
 - What are the short term impacts?
 - What are the long term impacts?

1. Long term impact to community esthetics
 - What will be the expected level and audible perception of ongoing noise pollution, i.e. electrical buzzing?
 - What will be the visible distance and lines of sight of new construction?

1. Impact to human health and human safety
 - What is the latest health research on the impacts of EMF on human health?
 - Specifically focused on the health and development of children and pregnant women?
 - Is there enough good information to understand the long term exposure impact over a lifetime?
 - Please pay specific attention to who has funded the research due to known impacts of research bias and publication bias when research is funded
 - How will EMF impact the day to day lives of people who live or visit others near t any new construction routing with acute health issues, for example, with pacemakers.

1. Impact to the environment and wildlife
 - Impact to wetlands in the course of construction and ongoing maintenance?
 - Impact to habitat formation, maintenance, and migratory patterns of the many species of animals that inhabit the routes?

1. Precedent for future development
 - Based on whether or how this project advances what will be the future consequences?
 - Will this result in similarly contested projects for future expansion?

Additional Comments

- This process by the utility companies has appeared to be a quick and dirty reaction to an immediate demand issue at the time, but has not appeared to be part of any longer term vision or plan. The impact of such a project, especially being such a large and ugly visual impact to the housing and to the community, will have consequences in the extremely long term. This project will probably impact the community for the next 50 years and as such, it is reasonable that we should expect that the utility companies are considering such impactful projects in this proper context and not in a "short term fix" mentality. With that in mind:
 1. How does this fit into a 50 year plan?
 2. What is the greater vision for the western side of the twin cities well into the future?
 3. If some kind of project is ultimately advanced what would be next and when?
 4. Does this project make sense considering population and economic growth for the long term?
 5. If so, has it been demonstrated that this is the optimized solution for the long term?
- Any project based on new construction should be a last resort.
- This project has the potential to fundamentally change my desire to live in Plymouth in the future.
 - If the large metal poles are installed along a number of the proposed routes, they will be highly visible from my home. Whereas I live near some current low voltage lines, they are not visible but the larger poles would be an eyesore from my home. I expect that my property values would plummet even lower than they already have over the last 5 years.
 - With three young children I would have no choice but to seriously considering moving from my home

over concerns for their long term health. I have seen enough studies on the potential impacts of high EMF to be extremely concerned. In the same way that industries for tobacco, asbestos, chlorofluorocarbon based chemicals, and other industrial groups claimed no harmful impact for decades I believe that the impact of high EMF exposure will follow a similar path. It is therefore difficult to place any trust in industry funded research on the subject of safety.

I am highly opposed to this project, and have been very disappointed in how the utility companies have so thoughtlessly created such a contentious community issue.

Regards,

Nathan Lukecart & Family

From: [Maria Maag](#)
To: [Steinhauer, Suzanne \(COMM\)](#)
Subject: Re: Powerlines
Date: Monday, November 05, 2012 2:26:07 AM

I live on 16242 50 th Ave N, Plymouth MN 55446

I chose that piece of land for my townhome, before anything was build, it took me 3 years to find this beautiful land, where they build the townhomes.

The reason was I did not want any powerlines near me, I am old and have allergies and I was told powerlines are bad for my health. this is my retirement home, that I love very much.

Please, please consider an alternative route.

Thank you very much for your consideration.

Maria Maag

From: [Mis](#)
To: [Steinhauer, Suzanne \(COMM\)](#)
Subject: Hollydale Environmental Review
Date: Thursday, November 15, 2012 2:34:02 PM

To Whom It May Concern:

As residents of Medina whose property will be affected by the proposed Hollydale HVTL project, we appreciate the opportunity to comment on the project and the need for a full environmental impact report.

Without commenting on whether the communities actually need or will need increased power supply, we are concerned about the proposed expansion/upgrade for several reasons:

- 1) what will be the impact on the health of residents living along the prospective route(s) of the high transmission lines**
- 2) what will be the impact on the property values of homes located on the prospective route(s) because of the answer to item #1**
- 3) will the very high poles detract from the visual appeal of rural Medina**

Given the current densities of the neighborhoods through which the project will pass, it seems prudent to require burial of the lines to a sufficient depth to protect the health of citizens and to guard against damage from new development or weather events. Perhaps cities should be willing to share in the added to cost to bury lines.

Presuming that upgrades to handle increasing power demands are needed (and that is still to be ascertained), then suggestions such as distributed power -- using more but smaller substations and smaller poles or buried lines -- would be a satisfactory solution that balanced future power needs with the health and vitality of our neighbors and neighborhoods.

Thank you.

**Judy and Chris Mallett
2492 Willow Drive
Medina MN 55340**

From: [Craig Mattson](#)
To: [Steinhauer, Suzanne \(COMM\)](#)
Subject: Hollydale 115kV HVTL Certificate of Need
Date: Friday, November 16, 2012 4:00:01 PM

Suzanne Steinhauer

Thank you for the opportunity to comment on the Hollydale 115kV HVTL Certificate of Need. I would ask that the Department of Commerce closely examine the document provided by Excel and Great Plains. I believe they have not clearly defined the reason for the need. They have not provided adequate documentation of the increased need. They have also stated that the growth in demand is in northern Plymouth and the impact of the proposed line is in central and western Plymouth. There seems to be a disconnect on what and why they are asking for more capacity and how they want to solve the 'problem'. It is also not clear why existing lines need to be upgraded when they are not even being used today to transmit.

Also they have not adequately considered the effects of electromagnetic force ("EMF") on human health with specific focus on children - as at least two educational institutions may be directly affected, socioeconomic effects with specific focus on direct and indirect property devaluation and corresponding loss of revenue to the cities, safety, aesthetic and noise effects, effect on wetlands, etc.

I also want the Department of Commerce to make them consider burying lines if they MUST be built.

Thank you

Craig Mattson
18690 34th Avenue North
Plymouth, MN 55447
763-476-9376

Prime Therapeutics made the following annotations

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ENERGY FACILITY PERMITTING
ENVIRONMENTAL REPORT
SCOPING COMMENT FORM

Hollydale 115 kV HVTL Project
PUC Docket: E002, ET2/CN-12-113

Name: RON MIELKE
Address: 4510 KIMBERLY CT. N.
City: PLYMOUTH State: MN ZIP: 55446

Please share your comments and suggestions on the potential issues, impacts, and alternatives that should be considered in the Environmental Report to be prepared for the Certificate of Need for the proposed Hollydale 115 kV HVTL Project. Suggestions can be directed toward alternative means meeting the stated need for the Project.

You may turn in this form tonight or mail it to the address provided (use additional sheets as necessary). You may email comments to Suzanne Steinhauer, State Permit Manager, at suzanne.steinhauer@state.mn.us or fax to (651) 296-2888, with CN-12-113 in the subject line. Comments must be received no later than 4:30 PM, Friday, November 16, 2012.

^{SOMETHING} JUST DON'T MAKE SENSE HERE. AN ARTICLE IN THE NOV 3RD NEWSPAPER PLUS OTHER ARTICLES I'VE READ STATES LESS USEAGE AND PLUS AN INCREASE IN RATES OF 10% TO THE USERS. AND THIS HIGH VOLTAGE LINE TO POSSABLY GOING ^{THROUGH} A NICE RESIDENTIAL OF PLYMOUTH AND DECREASING THE PROPERTY VALUES AND UN SIGHTLY VIEW OF THESE LINES ARE STEPPING ON PEOPLES TOES.

WHY CAN'T THEY PUT THEM UNDER GROUND AND USING HIGHWAY 55 AND 494 WITH STRUCTURES ALREADY IN PLACE? SOMEONE AT A MEETING I ATTENDED SAID THAT MNDOT WAS HARD TO WORK WITH. WELL I KNOW THEY ARENT. WE'VE WORKED WITH THEM THROUGH THE CITY OF MPLS. ON THE OLSEN HWY PROJECT (HWY 55) AND THE HIAWATHA CORRIDOR PROJECTS AND MADE THINGS WORK OUT JUST FINE. WE JUST DON'T WANT OVERHEAD LINES.

Signature:

Date:

NOV. 3, 2012

From: [Morris, Jane](#)
To: [Steinhauer, Suzanne \(COMM\)](#)
Cc: [Morris, Jane](#)
Subject: PUC Docket No. CN-12-113
Date: Thursday, October 25, 2012 8:12:02 AM

Good morning Suzanne,

My name is Jane Morris and my parents currently live where the proposed Power Line would go right through their backyard. I grew up in the house where this proposed powerline will go over and eventually want to buy back this house from my parents. I will be very honest in telling you that why would I ever buy a house that has a HUGE powerline going through it? If I am their own daughter and won't buy the house if the proposed line goes through, why would anyone else? Their house is a beautiful house and I know that their house will go down in property value if this goes in.

Trust me, I am in Retail and know how important it is to make money but in the long run with all the people that are against this line going through so many neighborhoods, I think that Xcel could take the \$400-600k hit and make it so it does not go through the neighborhoods.

Thank you for taking the time in reading this email and I hope this project is a success in getting what everyone wants which is to get the lines out of the neighborhoods.

My parent's address is:

18375 37th Place North
Plymouth, MN
55446

The power line would literally go right over their house.

Jane Morris
Associate Demand Planning Manager
Home Essentials
Best Buy Co.
Work: (612) 291-9370
Cell: (612) 807- 0401

From: [The Napiers](#)
To: [Steinhauer, Suzanne \(COMM\)](#)
Cc: [Kaluzniak, Mike \(PUC\)](#); [Lipman, Eric \(OAH\)](#)
Subject: MPUC No. E-002/CN-12-113
Date: Wednesday, November 14, 2012 9:24:34 PM

To:
Suzanne Steinhauer
State Permit Manager
Minnesota Department of Commerce
85 7th Place East, Suite 500
St. Paul, Minnesota, 55101-2198
suzanne.steinhauer@state.mn.us

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

-
Mike Kaluzniak
Facilities Planner
121 7th Place East
Suite 350
St. Paul, Minnesota 55101-2147
mike.kaluzniak@state.mn.us

**In the Matter of Certificate of Need Application for the Hollydale 115 kV
Transmission
Line Project in the Cities of Plymouth and Medina, Hennepin County
MPUC No. E-002/CN-12-113
OAH Docket No. 8-2500-23147-2 (CN)**

Ms. Steinhauer,

Please consider the following in your review of the Certificate of Need (CoN) for the Hollydale 115kV Transmission Line Project CN-12-113.

Cost of the Project:

Speaking to cost of High Voltage lines the World Health Organization (WHO) makes very clear that all costs should be considered:

“From a utilitarian perspective, policy decisions cannot be made without a consideration of costs and these costs must be placed in context with the benefits. The costs and benefits of policy options should be considered at the broadest level and also presented in such a way that the costs and possible benefits to various stakeholders can be understood. All costs should be included, whether borne by industry, consumers or others.”

*(WORLD HEALTH ORGANIZATION
INTERNATIONAL AGENCY FOR RESEARCH ON
CANCER;
IARC MONOGRAPHS ON THE EVALUATION OF
CARCINOGENIC RISKS TO HUMANS; VOLUME 80
NON-IONIZING RADIATION, PART 1: STATIC AND
EXTREMELY LOW-FREQUENCY (ELF) ELECTRIC
AND MAGNETIC FIELDS;
page 45)*

Note that costs borne by the consumer should be considered. These should include health costs due to EMF and the association with childhood leukemia, impairment of real estate value, restoration of existing structures/landscaping, and others.

Consideration of all costs is imperative as the CoN, as submitted, analyzes alternatives at least partially on cost. Without a complete picture of costs the analysis is flawed and useless. Perhaps more to the point, analysis of the favored approach by the applicants without a complete cost estimate is misleading.

The impact of power lines on resale value of real estate values has been studied widely. The dollar impact has been estimated to be 10% to 40% plus an accompanying impact on time to sell:

“For example, Susan Coveny, President of RE/MAX-Prestige in Illinois, reports that sale prices of home located near power lines are at least 10 percent lower than comparable homes without power lines. Ms Coveny also noted that it took more than twice as long to sell a home located near a power line.”

*The Impact of Electromagnetic Fields on Property
Value,
Morgan Lewis & Bockius,
at page 3.*

Costs submitted as comparisons by the applicants simply don't pass the smell test. In Appendix B, pages 56-63 the applicant summarizes costs for what the applicant plainly states fill the need, but are rejected primarily on the basis of cost.

Can one really believe that a shorter, low voltage alternative (A2) can be twice the cost of a longer, high voltage base case (A1)? The comparison is silly. Adding insult to injury, Alternative A3 which has two feeder lines, each of which is longer than the one line in A2 is also stated to be more expensive than A2.

In the public hearing on October 25, 2012 at the Plymouth Creek Center, Michael Kaluzniak stated that the onus is on citizens to point out shortcomings in the application. **All the costs in the application for the Certificate of Need are flawed and should be re-evaluated.**

I would be happy to work with a non-aligned party to develop what I believe are examples of intentionally misleading cost calculations.

EMF impact on public health:

EMF is a Group 2B carcinogen.

“Extremely low-frequency magnetic fields are possibly carcinogenic to humans (Group 2B)”

*International Labour Organization, the International Commission on Non-Ionizing Radiation Protection, and the World Health Organization
Environmental Health Criteria 238 EXTREMELY LOW FREQUENCY FIELDS,
page 256.*

The WHO further states that an association exists between EMF and childhood leukemia.

“The association between childhood leukaemia and residential ELF magnetic fields, first identified by Wertheimer & Leeper (1979) and subsequently found in a number of epidemiological studies, has driven experimental and epidemiological research and risk assessment forwards in this area and led to the classification of ELF magnetic fields by the International Agency for Research on Cancer (IARC) as a “possible human carcinogen” (IARC, 2002). This evaluation of the carcinogenicity of EMFs is of particular relevance to this Environmental Health Criteria document.”

*International Labour Organization, the International Commission on Non-Ionizing Radiation Protection, and the World Health Organization
Environmental Health Criteria 238 EXTREMELY LOW FREQUENCY FIELDS,
page 255.*

Given that the preferred route, established as the basis of all cost and feasibility studies, is within 200 feet of at least 300 dwellings, the recommendation of the WHO of “prudent avoidance” should be heeded.

It is worth noting that in the CoN as filed by the applicants, the applicant cites the final report of the National Institute of Environmental Health Sciences final report “Health Effects from Exposure to Power-Line Frequency Electric and Magnetic Fields” as recommending public education on reducing exposure. The full text makes an additional responsibility that changes entirely the meaning of the paragraph. In the full quote the responsibility is also on the regulated industry to reduce exposure, which of course the recommended solution does not provide as effectively as the alternatives. For convenience the full citation:

Xcel version:

In 1999, the National Institute of Environmental Health Sciences (“NIEHS”) issued its final report on “Health Effects from Exposure to Power-Line Frequency Electric and Magnetic Fields” in response to the Energy Policy Act of 1992. The NIEHS concluded that the scientific evidence linking MF exposure with health risks is weak and that this finding does not warrant aggressive regulatory concern. However, because of the weak scientific evidence that supports some association between MFs and health effects, passive regulatory action, such as providing public education on reducing exposures, is warranted.

NIEHS report version: (underline added for emphasis)

The NIEHS concludes that ELF-EMF exposure cannot be recognized as entirely safe because of weak scientific evidence that exposure may pose a leukemia hazard. In our opinion, this finding is insufficient to warrant aggressive regulatory concern. However, because virtually everyone in the United States uses electricity

and therefore is routinely exposed to ELF-EMF, *passive regulatory action is warranted such as a continued emphasis on educating both the public and the regulated community on means aimed at reducing exposures.*

Again, to Mr. Kaluzniak's statement that citizens are solely responsible for pointing out deficiencies in the application – **the health claims and citations offered by the applicant as to the health effects of EMF radiation are intentionally distorted to minimize the proven negative impact associated with EMF radiation and to minimize WHO recommendations to mitigate those impacts.**

PUC and Department of Commerce role in the CoN:

I have done a cursory inspection of dozens of CoN applications on the Department of Commerce, eDockets search site. I found none that were declined or even had major modifications to the applications. It is inconceivable to me that honest consideration is given to both sides of contested cases and that the applicant prevailed in 100% of the cases.

In this case the criteria for a CoN is clearly spelled out in Minnesota Administrative Rules 7849.0120 – Criteria. Specifically:

a more reasonable and prudent alternative to the proposed facility has not been demonstrated by a preponderance of the evidence on the record, considering:

(1) *the appropriateness of the size, the type, and the timing of the proposed facility compared to those of reasonable alternatives;*

High voltage lines through densely populated areas is clearly NOT appropriate. Lower voltage alternatives A2 and A3 are more appropriate.

(2) *the cost of the proposed facility and the cost of energy to be supplied by the proposed facility compared to the costs of reasonable alternatives and the cost of energy that would be supplied by reasonable alternatives;*

Costs as presented by the applicant are simply wrong, Prima Facie. Further examination is imperative. Certainly no cost advantage can be assumed to be by a preponderance of the evidence on record.

(3) *the effects of the proposed facility upon the natural and socioeconomic environments compared to the effects of reasonable alternatives; and*

High voltage lines in residential areas, loss of real estate value, EMF impacts, all are vastly higher in A1 than in either A2 or A3, not even considering the alternative routes proposed in the routing case.

(4) *the expected reliability of the proposed facility compared to the expected reliability of reasonable alternatives;*

By the applicants own statements, A1, A2 and A3 are reasonable alternatives with similar reliability.

I ask the Commission and the Department of Commerce how, specifically, one can submit evidence on the record as the Commission has ruled to refute the faulty information in the application?

Alan Napier.

Alan and Nancy Napier
Home: 763.557.9398
The-Napiers@comcast.net

From: [Marikay Newberg](#)
To: [Steinhauer, Suzanne \(COMM\)](#)
Date: Tuesday, November 13, 2012 7:45:19 AM

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,

Marikay Newberg
16900 39th Ave N
Plymouth, MN 55446

From: [Gary Novotny](#)
To: [Steinhauer, Suzanne \(COMM\)](#)
Subject: PUC Docket No. CN-12-113
Date: Tuesday, November 13, 2012 11:58:36 PM

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.

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

Sincerely,
Gary Novotny
3937 Everest Lane North
Plymouth, MN 55446

From: [Jennie Nyren](#)
To: [Steinhauer, Suzanne \(COMM\)](#)
Cc: [Jennie Nyren](#)
Subject: Fwd: PUC Docket No. E002, ET2/CN-12-113 - Hollydale 115kV HVTL - CoN Comments
Date: Monday, November 12, 2012 5:27:19 PM

Hi Suzanne,

See the comments I submitted previously below.

Best Regards,
Jennie

----- Forwarded message -----

From: **Jennie Nyren** <jhnyren@gmail.com>
Date: Sat, Jul 28, 2012 at 9:40 AM
Subject: PUC Docket No. E002, ET2/CN-12-113 - Hollydale 115kV HVTL - CoN Comments
To: publiccomments.puc@state.mn.us
Cc: Rodrigo Fuentes <rodrigo.c.fuentes@gmail.com>, Jennie Nyren <jhnyren@gmail.com>

To Whom It May Concern,

I am writing to inform you that we strongly support the distribution alternatives listed in the main Certificate Of Need (CoN) Application, ie to supply the energy required by means of distribution upgrades rather than a transmission line project.

Furthermore, since the CoN Application does not make a clear case for additional energy demand, but instead indicates that the demand in the focused study area has consistently and significantly been declining since the 2006 load peak, we also question whether there is really a need for supplying additional energy to the area in the first place. The decline in energy demand between 2006 and 2009 cannot be explained by colder weather as the area has not experienced a statistically significant cooling trend during that timeframe.

Additionally, we also question why data is not provided through 2011.

Finally, the CoN claims that a decision has been made to no longer expand the 34.5kV system in this area. Would converting the 13.8kV feeder circuits to 34.5kV not solve the problem? Why was the decision made to no longer expand the 34.5kV system?

Best Regards,

Jennie Nyren & Rodrigo Fuentes
4355 Niagara Lane N, Plymouth, MN 55446

From: [Kristi Olafson](#)
To: [Steinhauer, Suzanne \(COMM\)](#)
Cc: [Kristi Olafson](#)
Subject: PUC Docket No. CN-12-113
Date: Tuesday, November 13, 2012 10:28:58 AM

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.

I am also very concerned about the impact of high voltage proposed to be so close to homes, the impact on health of residents especially children.

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

Sincerely,

Kristi Olafson

16768 39th Avenue North

Plymouth, MN 55446

From: erik@cshbuilder.com
To: [Steinhauer, Suzanne \(COMM\)](#)
Subject: PUC Docket No. CN-12-113
Date: Tuesday, November 13, 2012 2:31:10 PM

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.

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

Sincerely,

Erik Olsen

16929 39th Ave N. Plymouth, MN

From: [Anna Ostrov](#)
To: [Steinhauer, Suzanne \(COMM\)](#)
Subject: PUC Docket No. CN-12-113
Date: Monday, November 12, 2012 12:55:13 PM

Dear Ms. Steinhauer:

We are a homeowners in Holly Creek Townhomes in Plymouth. We are 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.

We are 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,

Anna Ostrovskiy
Gene Ostrovskiy
Alex Ostrovsky

3932 Everest Ln N
Plymouth, MN 55446
anoostrov@yahoo.com

We are Anna and Gene Ostrovsky anostrov@comcast.net (3932 Everest Ln N, Plymouth, MN 55446), homeowners of Holly Creek Townhome Development since June 1999. We support every word in Barb Comments, and Would like to tell you, please take these comments to your consideration.
Per **Barbara Fontaine**, pages 11-14 from 11-152_Scoping_Comments_4.pdf

I am a homeowner in the Holly Creek Homes Development AND a former homeowner in the Holly Creek Townhome Development, so I urge you to weigh what I feel is the primary reason Xcel is supporting the proposed path versus the alternate paths – COST. While the submitted documents have tables and rationale that would indicate cost is just “one of the factors considered in their decision”, if you take a hard look at each data element, the rationale for the “preferred route” is not supported by the data provided. As a matter of fact, if we truly look at the full table contained in the attached Appendix H and compare all of the data elements, Alternate Route Segment D and Alternate Route Segment B have the LEAST impact in all areas except farmland (impacted in Alternate Route Segment B). Since the preferred Substation Site appears to be Site A and the push is to use Routes A and C, I would like to focus on those areas and ask that Xcel document clear answers to the following questions given their data and associated rationale before these segments are approved. In my view, the data and rationale given for the “preferred routes A & C” do not make sense given the increased property and human impacts associated with these routes.

Let's look at **Preferred Segment C compared to Alternate Segment C** as an example: (The arguments for Segment A are similar)

From a simple visual glance given the maps in the attached appendix C, it is clear that there are far more “yellow dots” within as few as 20ft from the proposed path. Every one of those dots represents a family that will be clearly impacted both from a financial and health perspective by the proposed route. If you look at the Alternate Route C, you see FAR FEWER yellow dots. It's not 0, so clearly there will still be some impact, but let's look at the facts. As a reference, I have copied the table of data provided by Xcel in the application for Segment C:

I won't even attempt to argue the medial impacts of power lines because each side can find a study to debate either side, but the list below includes just a few of the many studies that are difficult to simply dismiss, so one would argue there is very good reason for health concerns and given this alone, why wouldn't we select a path that minimizes this potential impact if there is no other compelling reason?

List of Studies for Reference:

· According to a study in the **Internal Medicine Journal** September 2007;– People who lived **within 328 yards of a power line up to the age of five were five times more likely to develop cancer. Those who lived within the same range to a power line at any point during their first 15 years were three times more likely to develop cancer as an adult.**

The **California Health Department** issued their final report on power frequency EMF

in **October, 2002**. This 7-year, \$9 million study concluded EMFs can cause some degree of increased risk of childhood leukemia, adult brain cancer, Lou Gehrig's Disease, and miscarriage. The Evaluation further concludes that magnetic fields may cause suicide and adult leukemia. This study used a standard of **causation**, which is a more rigorous test than the more common standard that seeks to demonstrate of an *association* between EMF and many of these diseases.

A major new study which appeared in the **June 2005 British Medical Journal**, concludes there is a **statistical link between EMF from power lines and leukemia**. More specifically, this study found that children whose birth address was within **200 meters of an overhead power line had a 70% increased risk of leukemia.**(MY FAMILY is located within this measurement) **Children**

living 200 to 600 meters away from power lines had a 20% increased risk.

Most European countries, including the UK and Germany have prohibited the construction of transmission power lines near homes for many years.

The State of Connecticut passed by overwhelming margins in early May 2004 a law that requires power lines to be buried if they pass near residences, schools, hospitals and other sensitive facilities. As a follow-up, the Connecticut Council study showed that burying long lines is feasible

So what are the "other compelling reasons" for the "preferred segment C"? Xcel documented the following points for their rationale and I have added my commentary on each point:

Topic 1 - The route permit application indicates the proposed route is preferable to the Alternate because it maximizes the use of existing utility right of way and minimizes use of new right of way. I am struggling to understand this conclusion since Table 8 suggests that there is no real differential between the proposed route C and the Alternate route C when it comes to right of way. Yes the current route would use an existing transmission right of way, but the alternate route parallels existing highway right of way for 95% of the length. I do not consider either of these "preferred" for this attribute" since they both have right of way access, hence this is not a compelling reason to disrupt more families in my view.

Topic 2 – Impact to Nature - The wet lands impacted with the Alternate route is also marginally smaller. Xcel notes a "negative impact to snowmobile trails" with the alternate route, but this is ridiculous. The "snowmobile trail" is simply the ditch along the highway and since you cannot snowmobile through neighborhoods on either side

what snowmobilers would be impacted? (Just for reference, I am an avid snowmobiler and I would LOVE to use this "trail" but tell me – do I part my truck along HWY 55 to unload my sled and so I can access it?? The "sport impact" is not a valid argument for not utilizing the alternate route. Again – NOT a compelling reason for the "preferred" Segment C.

The Application's conclusion versus my conclusion:

On page 33 of the application, it **clearly notes the greater residence impact with the "preferred" versus alternate route C**, but this is offset with the comment that "no new impacts to these residences would occur from using the proposed route segment C". I am frankly insulted by this comment and take great exception to this conclusion. The existing 69kV lines are wood and while I didn't physically measure one, I suspect they fall into the standard 50-70 ft. height. The new poles will be

nearly twice the height (75-105 ft), have a larger concrete base and be made of steel. In addition, the EMF values will be different. So I absolutely cannot agree that there is "no new impact". Would you want a 105ft steel pole 20 feet from your back door? Would you consider this "no new impact" on your home? The only real advantage I can see for the proposed route C versus the alternate route C is cost (\$8 versus \$8.67 million) and this differential should NOT be the driving factor in the disruption of **68** homes versus **19** homes. As an additional point of reference, as I estimate distances looking at the photos in appendix B it would appear that 6 of the 19 homes on the alternate path would be impacted in either route. As a matter of fact, the costs associated with the various routes to Site A per Xcel are as follows:

Proposed Route to Preferred Substation Site A \$8.00

Alternate Route Segment A to Preferred Substation Site A \$8.20

Alternate Route Segment B to Preferred Substation Site A \$9.48

Alternate Route Segment C to Preferred Substation Site A \$8.67

Alternate Route Segment D to Preferred Substation Site A \$8.23

Given the fact that the "preferred" route is the "cheapest" route, is there ANY doubt

Given the fact that the "preferred" route is the "cheapest" route, is there ANY doubt that the REAL reason for its preference/selection, is cost?

Certainly business revenue is important, but since I can see no viable reason other than cost for Xcel to select the "preferred" segments C and A. Are we truly willing as a society to accept this rationale and look the impacted families in the eye and say - saving Xcel money is more important than their potential future health or home value? Is reasonable to say "we shouldn't make Xcel spend more on this project", given the fact that the **Chairman & CEO of Xcel, Mr. Richard Kelly. Has a total compensation in 2010 of \$7,024,885? (Per the Star & Tribune, April 2010) Is it more**

important to put the profits of Xcel above the health and well being of the very people

paying for the services of Xcel? As our government leaders, I urge you to really take

each data point used for selecting the preferred paths and ask yourself – is this

REALLY a reason to impact the health and well being of MORE families. I feel

strongly that if the data elements are evaluated without the cost bias, you will see that the alternate routes are actually the ones that impact the future financial and health well being of FAR FEWER families and hence should be chosen as the "preferred

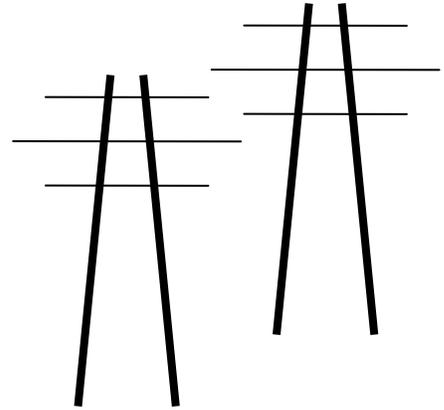
routes" for this project.

Legalelectric, Inc.

Carol Overland Attorney at Law, MN #254617
Energy Consultant—Transmission, Power Plants, Nuclear Waste
overland@legalelectric.org

1110 West Avenue
Red Wing, Minnesota 55066
612.227.8638

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



November 16, 2012

Suzanne Steinhauer
Energy Facilities Permitting
Dept of Commerce
85 – 7th Place East, Suite 500
St. Paul, MN 55101

via email – Suzanne.steinhauer@state.mn.us
eFiled & eServed

RE: Scoping Comments for Certificate of Need Environmental Review
Hollydale Project System Alternatives for Analysis
PUC Docket No.: E002/CN-12-113

Dear Ms. Steinhauer:

I am sending this EA Systems Alternatives Comment as an individual, not representing any party, and am making this comment as one with knowledge of many things electrical including this and other transmission dockets. This is a reworking of prior comments. The information provided has been submitted previously in this dockets but I'm not seeing that it's been taken into account, and the only opportunity for systems alternatives to be evaluated is in the Certificate of Need docket.

First, demand is way down, and the alternatives to this project should reflect options possible due to the slower rate of demand. The studies in Appendix B of the CoN Application are outdated, focused on 2006 and 2009 information, when more current information should be incorporated. New information would significantly alter the analysis. Xcel Energy has filed at least two "Notice of Changed Circumstances" in which it states that demand has dropped so significantly that projects which have been deemed "needed" should be reassessed due to a now forecasted 0.5% peak demand:

We now expect 0.7% annual demand growth and 0.5% annual energy growth over the Resource Plan horizon, down from 1.1% and 0.9%, respectively, included in our initial filing. The magnitude of the reduced forecast is such that it prompts us to reconsider some components of our Five Year Action Plan.

Notice of Changed Circumstances, p. 6, Integrated Resource Plan PUC Docket 10-825; see also Notice of Changed Circumstances, Prairie Island Uprate, 08-509. This information should be incorporated into the forecasts that serve as the basis for this project.

Second, as did Hiawatha, this project proposes a transmission solution yet presents a distribution problem:

The demand for power in this area has increased beyond the capability of the current electrical distribution system...

CoN Application p. 1. Distribution solutions must be considered as systems alternatives.

The “need” for the project is set forth in Chapter 3 of the Application, entitled “Distribution Load Serving Need Analysis” summarized in the introduction:

In Chapter 3, we explain why we are proposing the Project. This is referred to as “the need” for the Project. We cover how the current distribution and transmission facilities provide electric service to our customers and how the current facilities are not enough to support current and future demand for electricity in the area...

Id., p. 4.

Applicants state that there are 13 feeders in the project’s Focused Study Area, 2 of which are 34.5 kV and 11 of which are 13.8 kV. Application, Appendix B, p. 11, Plymouth Area Load Serving Study Because there are only two 34.5 kV feeders, they can only be operated at 50% of capacity due to reliability issues. Id. p. 33. Addition of just one 34.5kV feeder circuit in 2003-2004 shows approximately 17 MW increase in capacity. Id., Figure 4.5. Applicants also state that their study “demonstrates a capacity need on the 13.8 kV distribution system within the Focused Study Area. Id. p. 34. The 13.8 kV system is old, and cannot handle increased loads – it is the weak link in the system, and should be upgraded.

Logically, system alternatives to be addressed must specifically include:

- Impact of decreased demand, using Xcel Energy’s forecasted 0.7% peak demand increase and 0.5% energy increase.
- Energy efficiency as means to reduce load, individually **AND/OR** in combination with other measures.
- Peak shifting to reduce peak demand in area **AND/OR** in combination with other measures.
- Analysis of both coincident peak and non-coincident peak.
- Conservation including and in addition to mandated load reduction measures.
- Use of solar on big boxes along Interstates 494, 694, and 394, and State Hwy. 55 as a means for peak reduction.
- Upgrade of project area 13.8 kV system to 34.5 kV system (conductors, transformers, etc.).

- Increase of 34.5 kV feeders beyond the existing 2 feeders to increase available capacity beyond the restricted 50%.
- Cooperative/joint service with non-Xcel utilities in the area.

In addition, the EA should analyze the full range of “potential to emit” Magnetic Field (MF) levels, conceptually similar to that found in air permit analysis. The MF values in the CoN Application’s Table 12 grossly understate potential magnetic field levels. For purposes of environmental review, the narrative regarding MF should reflect that the Current (Amps) could be much higher with the configurations and line specifications proposed by the Applicants, and modeling for the higher values should be performed and incorporated. See Attached Affidavit of Bruce McKay, P.E., entered in Hiawatha Project docket for 115 kV single and double circuit lines, which is the same 115kV configuration and specification as for this project.

McKay’s calculations of potential magnetic fields, from Exhibit D attached:

THIS TABLE CONTAINS DATA SCALED FROM THE TABLE ABOVE USING CURRENTS CALCULATED IN STEP 3														
Figure 41: CALCULATED MAGNETIC FLUX DENSITY (MILLIGAUSSS) FOR PROPOSED 115KV TRANSMISSION LINE DESIGNS (1 METER OR 3.28 FEET ABOVE GROUND)														
Route	Structure Type	System Condition	Current (Amps)	Distance to Proposed Centerline										
				-200'	-100'	-75'	-50'	-25'	0'	25'	50'	75'	100'	200'
B & C	Horizontal Post 115kV Single Circuit	Peak	965.07	2.81	9.40	14.69	25.47	50.81	109.77	110.14	51.11	25.60	14.73	3.61
		Average	723.80	2.20	7.40	11.54	20.04	40.02	86.49	86.75	40.28	20.14	11.59	2.83
A	Davit Arm 115KV/115kV Steel Pole Double Circuit	Peak	1930.13	1.85	12.50	26.27	66.13	193.27	322.58	191.08	64.87	25.60	12.08	1.76
		Average	1447.60	1.36	9.44	18.78	49.62	144.97	241.90	143.29	48.67	18.04	9.13	1.36

These potential magnetic fields are much higher than those levels offered in the Application. To be accurate and to fully disclose, environmental review for this project must include:

- A range of Magnetic Field levels for Current (Amps) ranging in amps from 965 amps for a single circuit to 1930 amps for a double circuit, ranging in distance from 0 feet to as many feet as it takes to drop to 2mG, including modeling at a 37.5 feet edge of right of way distance, and extend outward until levels modeled drop to 2mG.

Thank you for the opportunity to submit Scoping comments.

Very truly yours,



Carol A. Overland
Attorney at Law

**STATE OF MINNESOTA
OFFICE OF ADMINISTRATIVE HEARINGS
FOR THE PUBLIC UTILITIES COMMISSION**

In the Matter of the Northern States Power Company
Certificate of Need Application for Two 115kV High
Voltage Transmission Lines known as the
Hiawatha Project

OAH DOCKET NO. _____
PUC DOCKET NO. E002/CN-10-694

AFFIDAVIT OF BRUCE McKAY, P.E.

Bruce McKay, P.E., after affirming or being duly sworn on oath, states and deposes as follows:

1. My name is Bruce McKay. I am an electrical engineer, and licensed Professional Engineer, in the state of Minnesota.
2. My experience is primarily in the areas of industrial power distribution and industrial automation and control. I have 16 years experience in these areas as a licensed Master Electrician, followed by 14 years as a licensed Professional Engineer to date.
3. I am a landowner near Henderson, MN, and therefore am not directly affected by the proposed Hiawatha Project transmission line.
4. I am filing this scoping comment for the Hiawatha Project Transmission Line to request that the Environmental Report address the full range of potential magnetic fields.
5. Attached as Exhibit A is a true and correct copy of the line configurations and specifications found on p. 15-27 of the Certificate of Need Application for the Hiawatha Project.
6. Attached as Exhibit B is a true and correct copy of Direct Testimony of Larry L. Schedin, Attachment J, showing the Summer Thermal Ampacity Rating and Summer Thermal MVA Rating for various conductor specifications, including, at the top of the chart on p. 3, Single 795 kcm 26/7 ACSR, 115 KV (963 amps and 192 MVA) and on pages 4-5, Winter Ratings (1286 amps and 256 VMA). For the purposes of this Affidavit, I am using the lower summer ratings, but it should be noted that winter ratings are approximately an additional 30%, and the magnetic field levels presented are not the higher potential winter levels.
7. The first purpose of this statement is to point out the fact that the Hiawatha Project Magnetic Field tables and charts that I've seen in Hiawatha Project documents all fail to address the full potential Magnetic Field along the transmission lines. Each table and chart that I've seen displays Magnetic Field data calculated from estimated Peak and estimated Average System Conditions (Current (Amps)) rather than from transmission line design capacities. An example of such a table is presented in the attached Exhibit C, a true and correct copy of Hiawatha Project Figure 41- Calculated Magnetic Flux Density Chart, which is from the Hiawatha Project Certificate of Need Application, page 102.
8. The second purpose of this statement is to point out the fact that a table such as this underestimates the Magnetic Field that would be created if the transmission line was utilized

to its full potential capacity, or 75% of its full potential capacity. The attached Exhibit D is a true and correct copy of "McKay Magnetic Field Calculations" which presents an example of Magnetic Field calculations for the A, B and C Route options based on estimated transmission line currents as compared to Magnetic Field calculations based on future potential (design) transmission line currents. By following through STEPS 1, 2, 3, and 4 in Exhibit D, you can see that for Route A, Double-Circuited, the Calculated PEAK MAGNETIC FIELDS increase by 839% and the Calculated AVERAGE MAGNETIC FIELDS increase by 1049%. For Routes B and C, both single circuit, the Calculated PEAK MAGNETIC FIELDS increase by 419% and the Calculated AVERAGE MAGNETIC FIELDS increase by 524% when design capacities are used for the calculations rather than using estimated load currents. (Please Note: Exhibit D is presented as a conceptual example. Actual design capacities and associated Magnetic Field calculations would need to be and should be provided by the Applicants.)

- 9. The third purpose of this statement is to point out the fact that no calculations were presented for modeled magnetic field levels at the same distances from centerline but higher off the ground to represent second or third floor locations of apartment buildings or condos that the proposed transmission lines would be passing near.
- 10. The fourth purpose of this statement is to stress that right-of-way widths to protect the health and safety of those along the proposed transmission line need to be based on Calculated Magnetic Field's derived from design capacities, NOT on Calculated Magnetic Field's derived from estimated transmission line currents. A right-of-way based on the Applicant's low transmission line current estimates does not sufficiently protect people near the transmission lines.
- 11. Please feel free to contact me with any comments or questions you have.

Further your affiant sayeth naught.

Dated: April 6, 2011

Bruce McKay

 Bruce McKay, PE
 e-mail: bmckay.aces@gmail.com
 cell: 612-386-5983

Signed and sworn to before me this 6 day of April, 2011.

Walter Giesen

 Notary Public

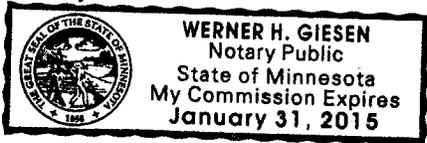


EXHIBIT A

Line Configurations and Specifications

Certificate of Need Application
Section 2.0 Project Description
p. 15-27

2.0 PROJECT DESCRIPTION

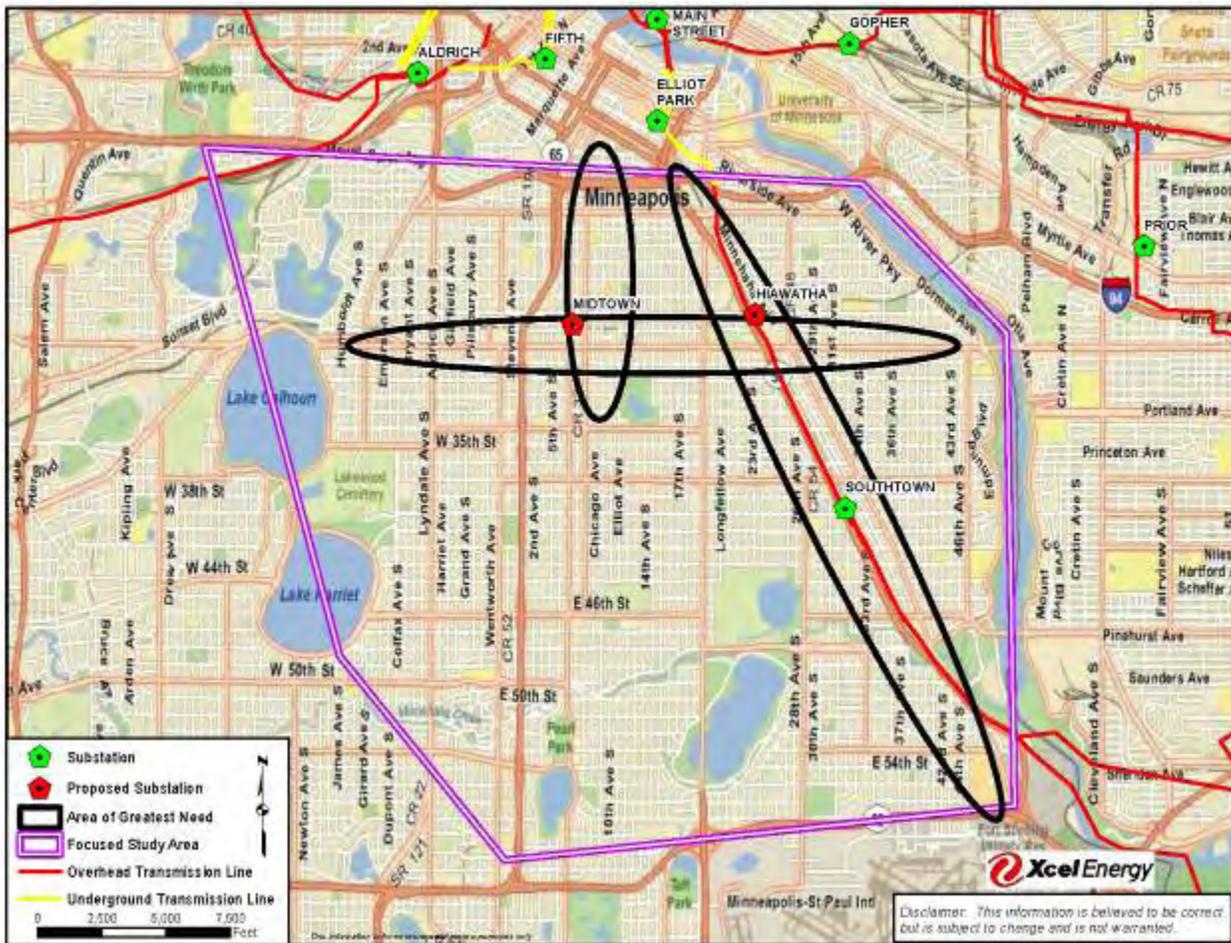
The Project includes two new substations, a Midtown Substation and a Hiawatha Substation, and two 115 kV transmission line connections between the two substations. Xcel Energy's proposal is to construct the transmission lines along Route A, build the Midtown Substation at the Midtown North site and the Hiawatha Substation at the Hiawatha West location. This double circuit design maximizes efficiencies and reduces overall right-of-way requirements. Detailed descriptions of the Project components and transmission line characteristics are provided in this chapter. This chapter also includes information regarding schedule, costs and rate impact.

2.1 FACILITIES TO BE CONSTRUCTED

2.1.1 SUBSTATIONS

The Company identified a need for additional sources in the Project Area, specifically in the areas of high load concentrations along Hiawatha Avenue, Lake Street and along Chicago Avenue and Park Avenue corridors. To address this need the two new substations are proposed to be located in the concentrated load areas, as shown in Figure 4.

Figure 4: Substation Locations Within Concentrated Load Areas



On the west end, the Midtown Substation is proposed to be located on the northwest corner of the intersection of Oakland Avenue and the Midtown Greenway. It is proposed to be a high profile design of approximately three quarters of an acre. Equipment at the substation would include:

Two 115 kV transmission line steel box structures and related substation equipment and structures;

One 70 MVA, 118-14.4 kV, LTC distribution transformer;
and

One electrical equipment enclosure containing 13.8 kV distribution feeder equipment, electrical controls, protective relaying, and auxiliary equipment for the operation of the substation.

The Midtown Substation alternatives will be surrounded by an architecturally-designed, decorative wall which will aid in mitigating noise generated by the operation of the substation. In addition, the Company plans to install lower noise transformers, sound absorbing materials for the transformer fire walls and rubber matting under the substation transformers.

A new Hiawatha Substation is proposed on the east end of the Project. The Hiawatha Substation is proposed as a low profile design, approximately two (2) acres in size. The Hiawatha Substation would initially consist of the following equipment:

115 kV transmission line dead-end structures and related substation equipment and structures.

One 13.8 kV transformer termination structure;

One 50 MVA, 118-14.4 kV, Load Tap Changer (“LTC”) distribution transformer;

One switchgear enclosure containing 13.8 kV distribution equipment; and

One electrical equipment enclosure containing electrical controls, protective relaying, and auxiliary equipment for the operation of the substation.

Conceptual layouts for the Midtown Substation and the Hiawatha Substation are provided in Appendix D.

2.1.2 TRANSMISSION LINES

2.1.2.1 ROUTE A

Xcel Energy proposes to construct two 115 kV transmission lines along Route A. There are three potential alignments along Route A. Alignment A1 follows 29th Street and consists of two overhead 115 kV transmission lines on double circuit structures. Alignment A2 is an underground design along 29th Street, parallel to the Midtown Greenway. Alignment A3 is an underground design on an alignment under the bike/walking path along the north edge of the Midtown Greenway.

For Route A—Alignment A1, Xcel Energy proposes to use galvanized, self-weathering/rust-colored steel double circuit structures with davit arms. For areas where the Project will cross existing and future light rail, auto, and pedestrian paths, custom designed structures will be used.

The right-of-way required would be 50 feet, 25 feet on each side of the pole, and located in public streets and the Midtown Greenway. Average spans between structures will be approximately 500 feet. However, span lengths may vary between structures from as short as 300 feet to as long as 1,000 feet to accommodate future plans for the area, such as future transit within the Midtown Greenway. The proposed conductor is 795 kcmil Aluminum Conductor Steel Reinforced (“ACSR”) 26/7 or conductor of comparable capacity per phase (“kcmil” is a unit of measure representing “thousand circular mils”).

The poles would be approximately 75-feet tall. Depictions of typical tangent and dead-end double circuit structures are shown in Figure 5 and Figure 6. At several locations the lines would cross existing and future light rail, auto and pedestrian paths. There will be custom designed structures for the current and future light rail corridors based on the field requirements at each location. These custom structures would be similar to the dead end structures depicted below with an additional arm to support crossings eliminating the need for an additional structure. These structures have not been designed at the time of filing, but will be designed once Commission approvals are obtained.

Figure 5: Double Circuit Tangent Structure

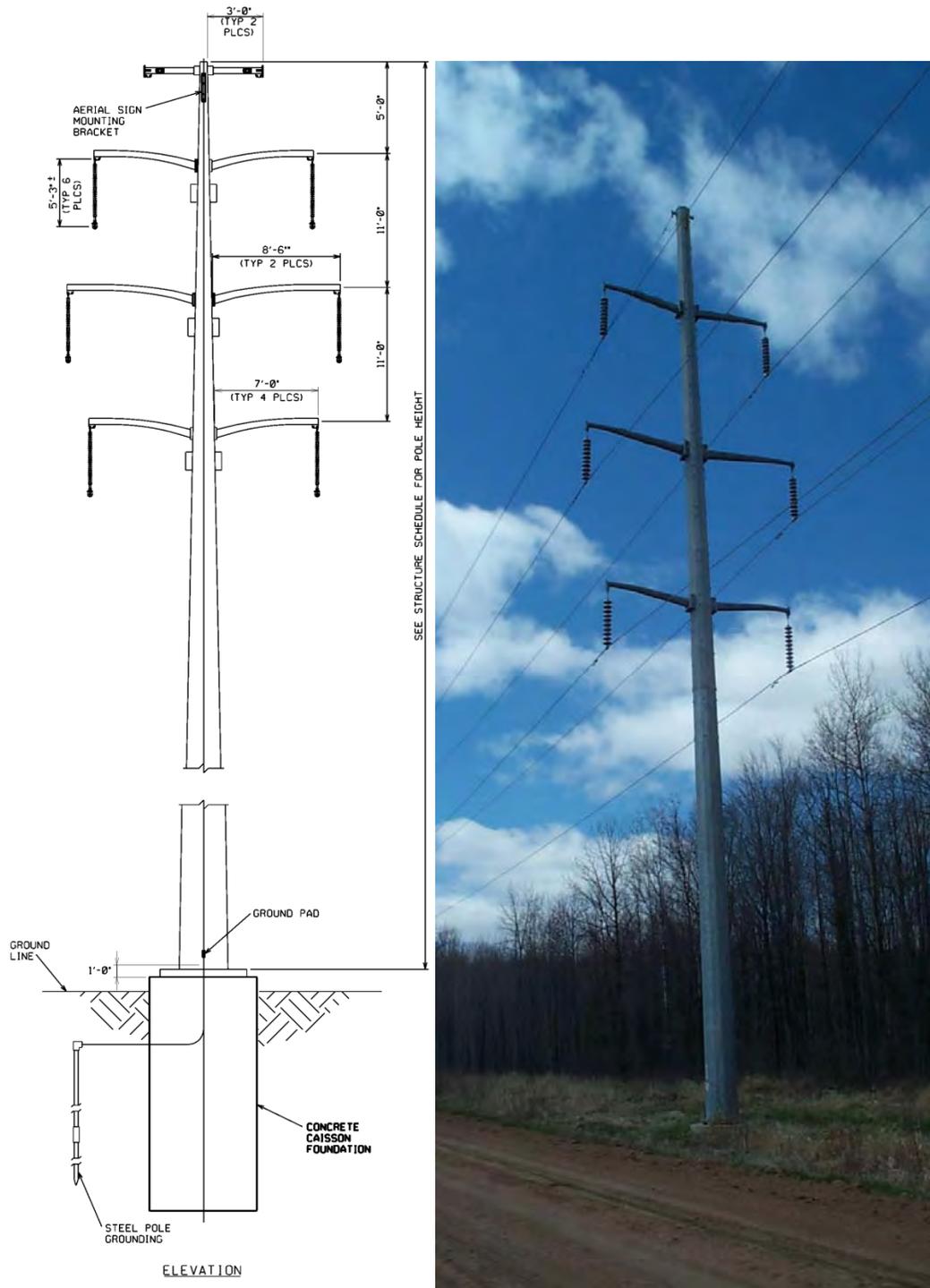


Figure 6: Double Circuit Dead-End Structure

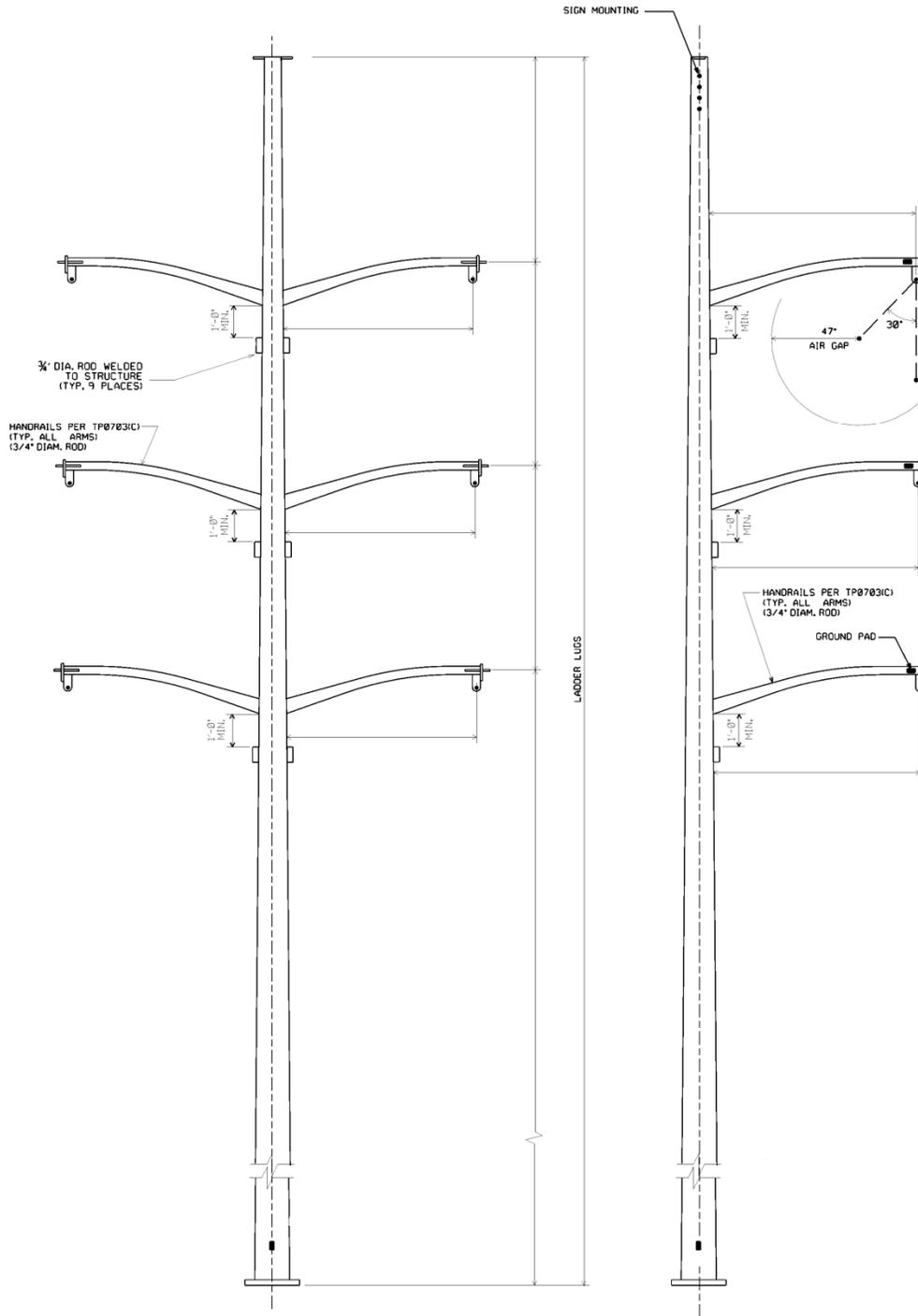


Figure 7 summarizes the structure designs and foundation for Route A.

Figure 7: Route A—Alignment 1 Double Circuit Structure Design Summary

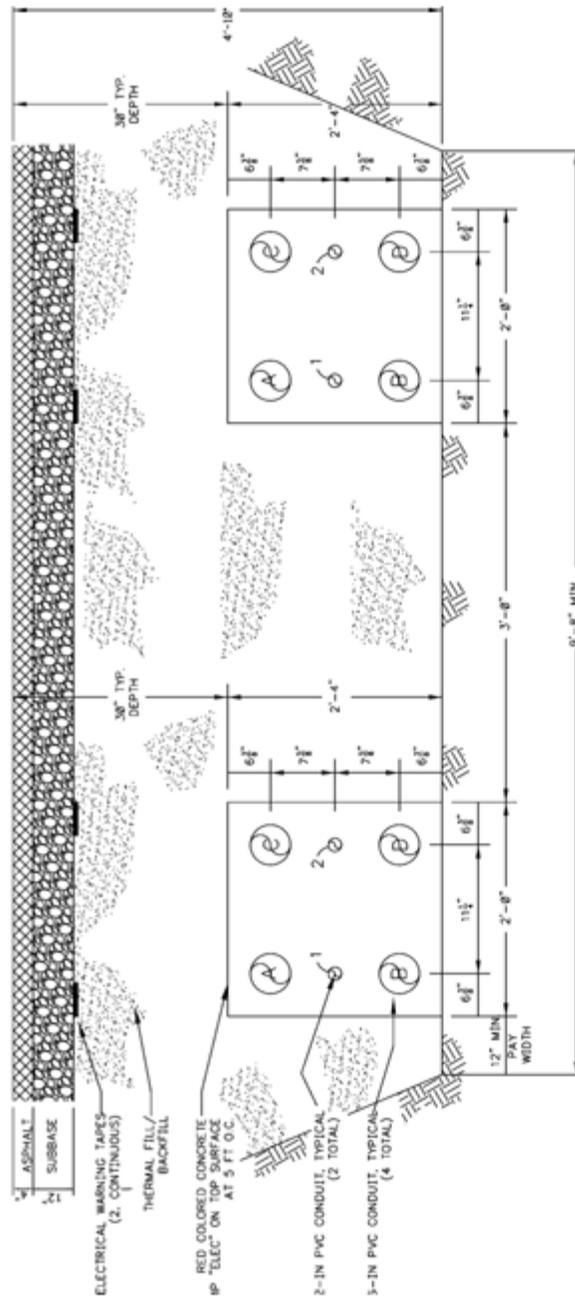
Project Component	Line Voltage	Structure Type	Pole Type	Conductor	Foundation	Average Span Length	Average Height	Maximum Height
Tangent	115 kV	Typical	Steel	795 kcmil 26/7 ACSR	Drilled Pier	500 feet	75 feet	110 feet
Dead-End	115 kV	Crossing	Steel	795 kcmil 26/7 ACSR	Drilled Pier and/or Driven Pile	500 feet	80 feet	115 feet

For the underground alignments on Route A—Alignment A2 and Alignment A3, Xcel Energy proposes to install two identical concrete duct banks containing four 6-inch polyvinyl chloride (“PVC”) conduits for the transmission circuits, and two 2-inch PVC conduits for ground continuity and communication needs. The duct banks are anticipated to be installed adjacent to each other in the same trench unless a different design is dictated by the physical limitations of the route. Cable vaults with manhole access will be required approximately every 1,500 feet and at major changes in direction in the route to facilitate the installation of the cable as well as for future inspection and repairs. The amount of right-of-way required for the underground design for Route A—Alignment A2 and Alignment A3 is 30 feet, or 15 feet on each side of the transmission line centerline.

The proposed cable is a high voltage extruded dielectric (“HVED”) cable, 3000 kcmil. HVED cable consists of stranded copper conductor surrounded by a solid electrostatic conductor shield and insulation. The outermost layers consist of an insulation shield and moisture block and cable shield covered by a layer of polyethylene protective jacket.

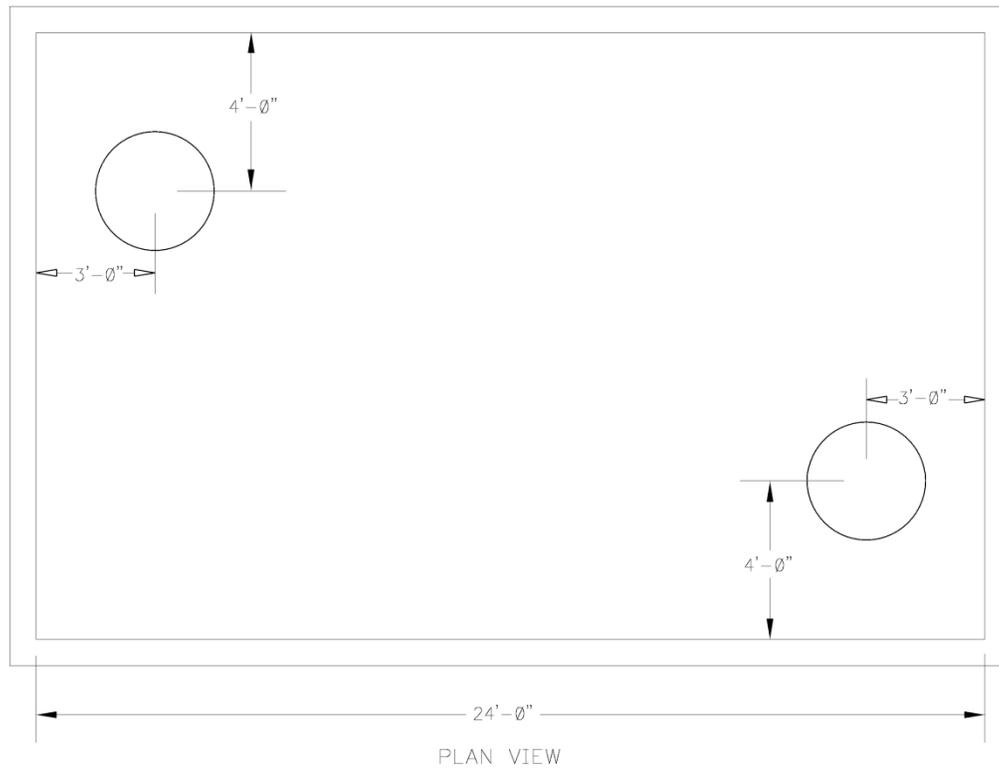
Figure 8 and Figure 9 illustrate underground ducts and vaults.

Figure 8: Underground Duct Section



NOTES:
 1. USE 2" PVC CONDUITS WITH PLASTIC SPACERS
 AT 5" MAXIMUM SPACING OF DOUBLE CIRCUIT LINE
 SECTION SHOWN TYPICAL OF DOUBLE CIRCUIT LINE
 MIN. & TYPICAL SPACING SHOW SUBJECT TO
 CHANGE DEPENDENT ON SOIL CONDITIONS.

XCEL TRANSMISSION LINE
 TYPICAL DUCT BANK SECTION
 NO SCALE

Figure 9: Underground Cable Vault

STREET MANHOLE
 (14' WIDE X 24' LONG X 7'-6" HIGH)
 NO SCALE

Details regarding construction techniques for underground transmission facilities are provided in Chapter 6.

2.1.2.2 OTHER ROUTES EVALUATED IN ROUTE PERMIT PROCEEDING

Overhead Design Single Circuit Route B and Route C

Routes B and C are street routes for two single circuit overhead 115 kV transmission lines. Route B follows 26th Street (1.8 miles) and 28th Street (1.5 miles). Route C follows 28th Street (1.5 miles) and 31st Street (2.3 miles). The same transmission line design for the facilities is proposed along both routes.

For Route B or Route C, a cantilever design is proposed. This design would require the installation of a single pole transmission structure with all davit arms and conductors installed on the side of the pole overhanging the public road or public

right-of-way. The National Electric Safety Code (“NESC”) clearance requirements dictate a 25-foot right-of-way clearance on the side of the pole with the installed davit arms. There is no NESC safety clearance minimum required for the side of the pole without the cantilevered arms and conductors. Xcel Energy will seek 25-feet of right-of-way on the street side and may seek to acquire a right-of-way on the non-arm side of the poles for access and maintenance of the structures up to 25 feet where feasible. Xcel Energy will work to minimize the right-of-way needed from private landowners to the extent possible.

The poles would be approximately 75-feet tall and typical spans will be 500 feet. The proposed conductor is 795 kcmil, 26/7 ACSR, or conductor of similar capacity.

Figure 10: Single Circuit Tangent Structure

(Also depicts direct embedded steel pole installation)

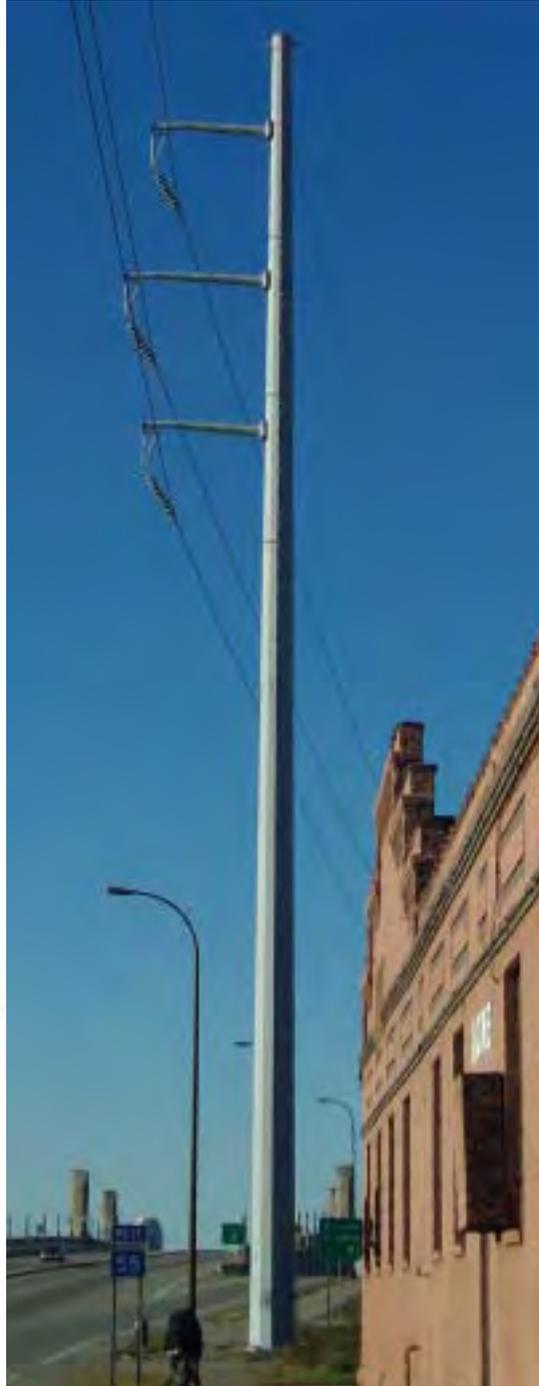
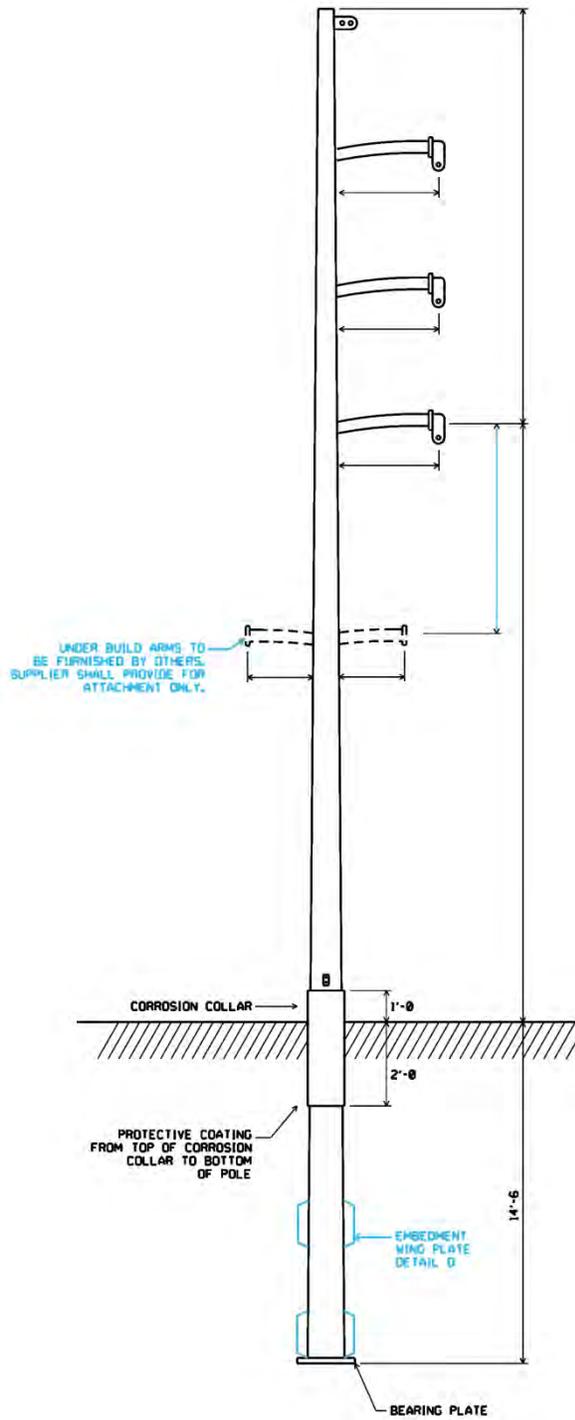


Figure 11: Single Circuit Dead-End 90 Degree Corner Structure

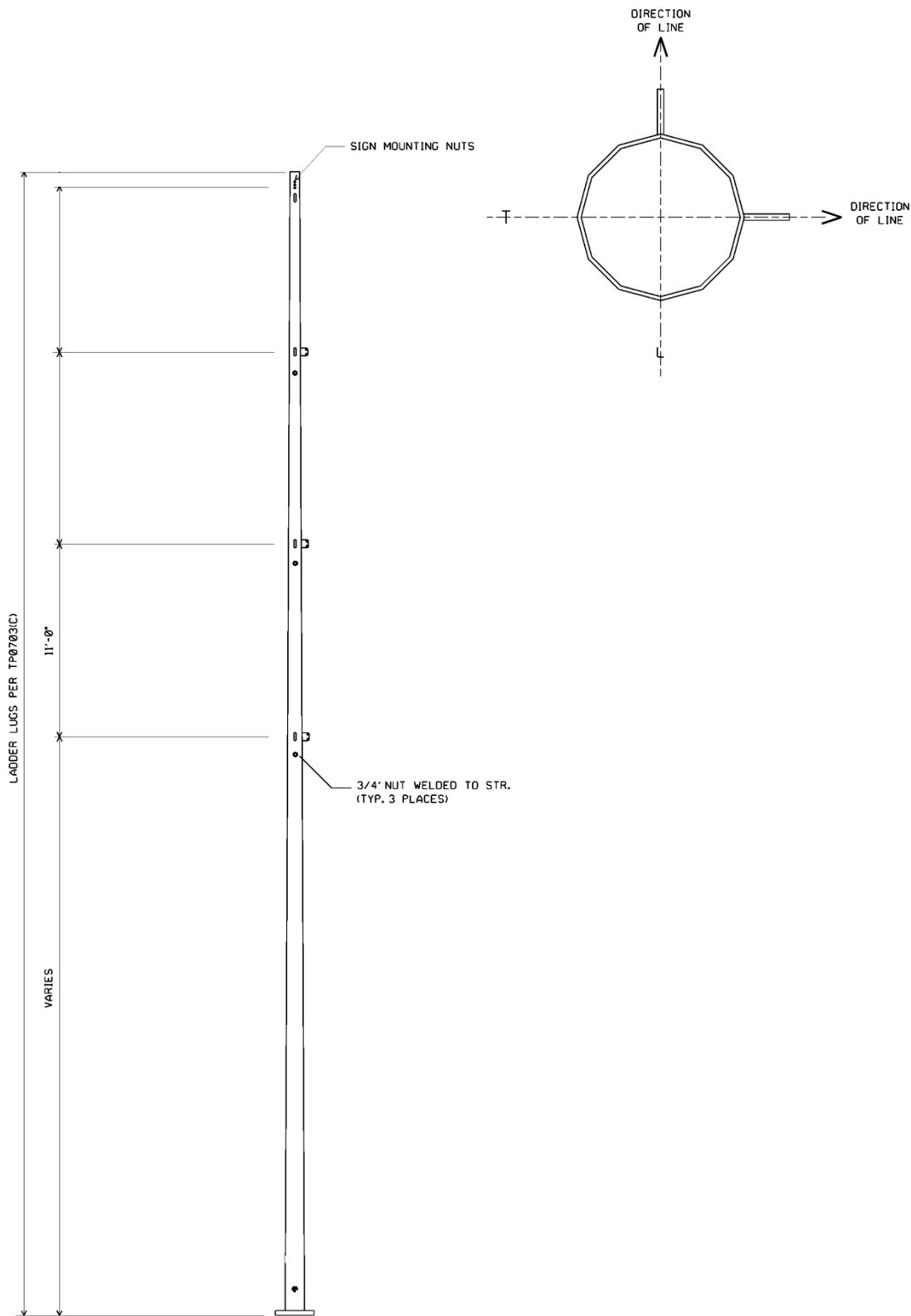


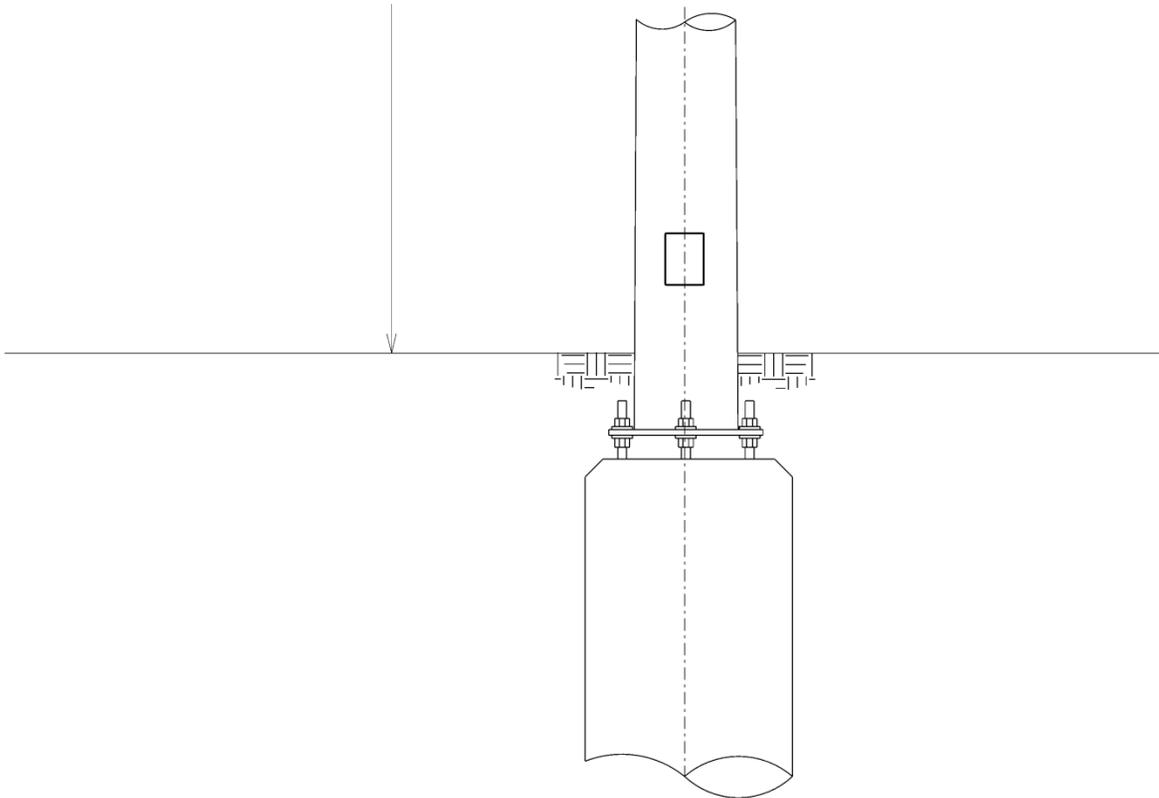
Figure 12: Subgrade Foundation

Figure 13 summarizes the structure and foundation designs for the line if constructed along Route B or Route C:

Figure 13: Route B and Route C, Single Circuit Structure Design Summary

Project Component	Line Voltage	Structure Type	Pole Type	Conductor	Foundation	Average Span Length	Average Height
Tangent	115 kV	Typical	Steel	795 kcmil 26/7 ACSR	Drilled Pier or Direct Imbed	500 feet	75 feet
Dead-End	115 kV	Crossing	Steel	795 kcmil 26/7 ACSR	Drilled Pier	500 feet	100 – 110 feet

EXHIBIT B

Amps and MVA for Line Configurations and Specifications

Direct Testimony of Larry L. Schedin, Attachment J
CapX 2020 Certificate of Need
PUC Docket E002, ET2/CN-06-1115

Response:

The thermal ratings of the requested conductors and voltages are noted in the table below. Conductor ratings are based on the “IEEE Standard for calculation of Bare Overhead Conductor Temperature and Ampacity Under Steady-State Conditions,” ANSI/IEEE Standard 738. Alcoa SAG10 Ratekit was used to calculate conductor ratings.

A regulatory authority does not set the conductor steady state thermal rating variables. The CapX2020 Member Utilities Transmission Line Standards Committee (“Committee”) developed the conductor steady state thermal rating variables for summer ratings based upon member utilities’ standard of practice..

The summer steady state thermal rating variables are as follows:

- Conductor orientation relative to north: 90 degrees
- Atmosphere: Clear
- Air Temperature: 40 degrees C for Summer
- Wind Speed: 2 ft/sec
- Wind angle relative to conductor: 90 degrees
- Elevation above sea level: 1000 ft
- Latitude: 45 degrees N
- Date: July 8
- Solar time: 12 hours
- Coefficient of emissivity: 0.7
- Coefficient of absorption: 0.9
- 200 degrees C maximum operating temperature for ACSS
- 100 degrees C maximum operating temperature for ACSR

The Committee defined the Emergency Line Rating as equal to the steady state thermal rating.

The Committee specified that conductors meet minimum clearances to ground based upon voltage and nature of surface under the conductor (*i.e.*, roads, interstate highway, railroads, etc.). The minimum specified clearances were chosen to assure that the final constructed lines meet or exceed the National Electrical Safety Code (“NESC”) minimum clearances. Conductor sags are to be calculated based upon conductor size, conductor temperature, span length, design tension, structure heights and loading conditions. Vertical clearances shall be applied to the greatest sag resulting from either the maximum operating temperature of 200°C (for the ACSS

conductor) and 100°C (for the ACSR conductor) or the maximum loaded condition (ice plus wind).

<u>Conductor</u>	<u>Summer Thermal Ampacity Rating</u>	<u>Summer Thermal MVA Rating</u>
Single 795 kcm 26/7 ACSR, 115 KV	965 amps	192 MVA
Single 795 kcm 26/7 ACSS, 115 KV	1655 amps	330 MVA
Twin bundled 795 kcm 26/7 ACSR, 115 KV	1930 amps	384 MVA
Twin bundled 795 kcm 26/7 ACSS, 115 KV	3310 amps	659 MVA
Single 954 kcm 54/19 ACSS, 115 KV	1850 amps	368 MVA
Single 795 kcm 26/7 ACSS, 161 KV	1655 amps	462 MVA
Single 954 kcm 54/19 ACSS, 161 KV	1850 amps	516 MVA
Single 795 kcm 26/7 ACSR, 230 KV	965 amps	384 MVA
Single 795 kcm 26/7 ACSS, 230 KV	1655 amps	659 MVA
Single 954 kcm 54/19 ACSS, 230 KV	1850 amps	737 MVA
Twin bundled 795 kcm 26/7 ACSR, 345 KV	1930 amps	1153 MVA
Twin bundled 954 kcm 54/19 ACSS, 345 KV	3700 amps	2211 MVA
Triple bundled 954 kcm 54/19 ACSS, 500 KV	5550 amps	4806 MVA
Triple bundled conductor as used on the Forbes – Chisago 500 KV line (Triple bundled 1192.5 kcm 45/7 ACSR)	3648 amps	3159 MVA

The Committee did not develop steady state thermal rating variables for winter ratings. Xcel Energy – NSP Operating Territory uses 0°C for the winter rating air temperature for calculating the rating during the winter operating season of November 1 to April 30. The April 30 date produces the lowest allowable line rating of the winter rating period, so it is used in the following table. The April 30 date and 0°C air temperature were used in conjunction with the other steady state thermal

rating variables developed by the Committee to develop the following winter rating table.

The winter steady state thermal rating variables used for the following Xcel Energy – NSP Operating Territory/ CAPX2020 Member Utilities Transmission Line Standards Committee rating table are as follows:

- Conductor orientation relative to north: 90 degrees
- Atmosphere: Clear
- Air Temperature: 0 degrees C for Winter
- Wind Speed: 2 ft/sec
- Wind angle relative to conductor: 90 degrees
- Elevation above sea level: 1000 ft
- Latitude: 45 degrees N
- Date: April 30
- Solar time: 12 hours
- Coefficient of emissivity: 0.7
- Coefficient of absorption: 0.9
- 200 degrees C maximum operating temperature for ACSS
- 100 degrees C maximum operating temperature for ACSR

<u>Conductor</u>	<u>Winter (April 30) Thermal Ampacity Rating</u>	<u>Winter (April 30) Thermal MVA Rating</u>
Single 795 kcm 26/7 ACSR, 115 KV	1286 amps	256 MVA
Single 795 kcm 26/7 ACSS, 115 KV	1819 amps	362 MVA
Twin bundled 795 kcm 26/7 ACSR, 115 KV	2572 amps	512 MVA
Twin bundled 795 kcm 26/7 ACSS, 115 KV	3638 amps	725 MVA
Single 954 kcm 54/7 ACSS, 115 KV	2032 amps	405 MVA
Single 795 kcm 26/7 ACSS, 161 KV	1819 amps	507 MVA
Single 954 kcm 54/7 ACSS, 161 KV	2032 amps	567 MVA
Single 795 kcm 26/7 ACSR, 230 KV	1286 amps	512 MVA

<u>Conductor</u>	<u>Winter (April 30) Thermal Ampacity Rating</u>	<u>Winter (April 30) Thermal MVA Rating</u>
Single 795 kcm 26/7 ACSS, 230 KV	1819 amps	725 MVA
Single 954 kcm 54/7 ACSS, 230 KV	2032 amps	809 MVA
Twin bundled 795 kcm 26/7 ACSR, 345 KV	2572 amps	1537 MVA
Twin bundled 954 kcm 54/7 ACSS, 345 KV	4064 amps	2428 MVA
Triple bundled 954 kcm 54/7 ACSS, 500 KV	6096 amps	5279 MVA
Triple bundled conductor as used on the Forbes – Chisago 500 KV line (Triple bundled 1192.5 kcm 45/7 ACSR)	4875 amps	4222 MVA

Surge Impedance

The following table shows typical ranges of surge impedances found on the CapX2020 member systems. Designs for the proposed CapX2020 transmission lines are not far enough along to provide more accurate surge impedances for these lines.

Conductor Configuration

Surge Impedance

Single Bundled Conductor – 115, 161 & 230 KV Configurations a, b, f & h	350 – 375 Ohms
Twin bundled Conductor - 115 KV Configurations c & d	250 - 300 Ohms
Twin bundled Conductor - 345 KV Configurations k & l	270 –285 Ohms
Triple bundled Conductor - 500 KV Configuration n	250 – 300 Ohms
Configurations e, g, i, j and m	Not Used

Response By: Brad Hill/David K. Olson
Title: Principal Specialty Engineer
Department: Transmission Engineering/Substation Engineering
Company: Xcel Energy
Telephone: 612-330-6826/612-330-5909
Date: April 21, 2008

2157846v1

EXHIBIT C

Applicant Magnetic Field Calculations

Figure 41: Calculated Magnetic Flux Density for Proposed 115 kV Transmission Line Designs
Hiawatha Project Certificate of Need Application

Figure 41: Calculated Magnetic Flux Density (milligauss) for Proposed 115 kV Transmission Line Designs (1 meter or 3.28 feet above ground)

Route	Structure Type	System Condition	Current (Amps)	Distance to Proposed Centerline										
				-200'	-100'	-75'	-50'	-25'	0'	25'	50'	75'	100'	200'
B & C	Horizontal Post 115kV Single Circuit	Peak	230	0.67	2.24	3.50	6.07	12.11	26.16	26.25	12.18	6.10	3.51	0.86
		Average	138	0.42	1.41	2.20	3.82	7.63	16.49	16.54	7.68	3.84	2.21	0.54
A	Davit Arm 115kV/115kV Steel Pole Double Circuit	Peak	230	0.22	1.49	3.13	7.88	23.03	38.44	22.77	7.73	3.05	1.44	0.21
		Average	138	0.13	0.90	1.79	4.73	13.82	23.06	13.66	4.64	1.72	0.87	0.13
A & D (3000 kcmil)	Transmission Duct Bank 115kV/115kV Under ground Double Circuit	Peak	230	0.00	0.01	0.03	0.11	0.84	13.08	0.85	0.11	0.03	0.01	0.00
		Average	138	0.00	0.01	0.02	0.07	0.51	7.85	0.51	0.07	0.02	0.01	0.00
A & D (1250 kcmil)	Transmission Duct Bank 115kV/115kV Under ground Double Circuit	Peak	230	0.00	0.01	0.02	0.05	0.37	19.67	0.37	0.05	0.01	0.01	0.00
		Average	138	0.00	0.00	0.01	0.03	0.22	11.80	0.22	0.03	0.01	0.00	0.00

EXHIBIT D

McKay Magnetic Field Calculations

\Calculated Magnetic Field Tables for Proposed 115 kV Transmission Line Designs

STEP 1														
THIS TABLE CONTAINS THE COLUMN HEADINGS AND DATA FROM THE TOP ENTRIES IN THE TABLE FROM EXHIBIT C														
Figure 41: CALCULATED MAGNETIC FLUX DENSITY (MILLIGAUSS) FOR PROPOSED 115KV TRANSMISSION LINE DESIGNS (1 METER OR 3.28 FEET ABOVE GROUND)														
Route	Structure Type	System Condition	Current (Amps)	Distance to Proposed Centerline										
				-200'	-100'	-75'	-50'	-25'	0'	25'	50'	75'	100'	200'
B & C	Horizontal Post 115kV Single Circuit	Peak	230.00	0.67	2.24	3.50	6.07	12.11	26.16	26.25	12.18	6.10	3.51	0.86
		Average	138.00	0.42	1.41	2.20	3.82	7.63	16.49	16.54	7.68	3.84	2.21	0.54
A	Davit Arm 115kV/115kV Steel Pole Double Circuit	Peak	230.00	0.22	1.49	3.13	7.88	23.03	38.44	22.77	7.73	3.05	1.44	0.21
		Average	138.00	0.13	0.90	1.79	4.73	13.82	23.06	13.66	4.64	1.72	0.87	0.13

STEP 2- Routes B & C	
MVA CALCULATED FROM THE CURRENTS IN TABLE Figure 41:	
115.00 kV	230.00 Amps PEAK ESTIMATED
1.73 3 Phase	45.76 MVA PEAK CALCULATED
115.00 kV	138.00 Amps AVERAGE ESTIMATED
1.73 3 Phase	27.46 MVA AVERAGE CALCULATED

STEP 2- Route A	
MVA CALCULATED FROM THE CURRENTS IN TABLE Figure 41:	
115.00 kV	230.00 Amps PEAK ESTIMATED
1.73 3 Phase	45.76 MVA PEAK CALCULATED
115.00 kV	138.00 Amps AVERAGE ESTIMATED
1.73 3 Phase	27.46 MVA AVERAGE CALCULATED

STEP 4														
THIS TABLE CONTAINS DATA SCALED FROM THE TABLE ABOVE USING CURRENTS CALCULATED IN STEP 3														
Figure 41: CALCULATED MAGNETIC FLUX DENSITY (MILLIGAUSS) FOR PROPOSED 115KV TRANSMISSION LINE DESIGNS (1 METER OR 3.28 FEET ABOVE GROUND)														
Route	Structure Type	System Condition	Current (Amps)	Distance to Proposed Centerline										
				-200'	-100'	-75'	-50'	-25'	0'	25'	50'	75'	100'	200'
B & C	Horizontal Post 115kV Single Circuit	Peak	965.07	2.81	9.40	14.69	25.47	50.81	109.77	110.14	51.11	25.60	14.73	3.61
		Average	723.80	2.20	7.40	11.54	20.04	40.02	86.49	86.75	40.28	20.14	11.59	2.83
A	Davit Arm 115kV/115kV Steel Pole Double Circuit	Peak	1930.13	1.85	12.50	26.27	66.13	193.27	322.58	191.08	64.87	25.60	12.08	1.76
		Average	1447.60	1.36	9.44	18.78	49.62	144.97	241.90	143.29	48.67	18.04	9.13	1.36

STEP 3- Routes B & C	
CURRENT CALCULATED FROM MVA DESIGN CAPACITY:	
115.00 kV	192.00 *MVA PEAK DESIGN
1.73 3 Phase	965.07 Amps PEAK CALCULATED
115.00 kV	144.00 **MVA AVERAGE DESIGN
1.73 3 Phase	723.80 Amps AVERAGE CALCULATED

STEP 3- Route A	
CURRENT CALCULATED FROM MVA DESIGN CAPACITY:	
115.00 kV	384.00 *MVA PEAK DESIGN
1.73 3 Phase	1930.13 Amps PEAK CALCULATED
115.00 kV	288.00 **MVA AVERAGE DESIGN
1.73 3 Phase	1447.60 Amps AVERAGE CALCULATED

- NOTES: 1. $MVA = (kV * Amps * 1.73) / 1000$
 2. $Amps = (MVA * 1000) / (kV * 1.73)$
 3. For a given physical and electrical configuration, milligauss at one location is proportional to current (Amps) (for example, double the current and the milligauss level also doubles).
 4. For a given physical and electrical configuration and constant current, the milligauss level changes as the inverse square of the distance from away from the source (for example, move 2 times as far away and the milligauss level decreases to 1/4 of what it was).
 *. MVA PEAK DESIGN CAPACITY IS FROM A COMBINATION OF THE DATA PRESENTED IN EXHIBITS A, B, AND C.
 **. MVA AVERAGE DESIGN CAPACITY WAS CHOSEN TO BE ABOUT 75% OF PEAK DESIGN CAPACITY

From: [LLOYD](#)
To: [Steinhauer, Suzanne \(COMM\)](#)
Subject: PUC Docket No. CN-12-113
Date: Monday, November 12, 2012 7:18:48 PM

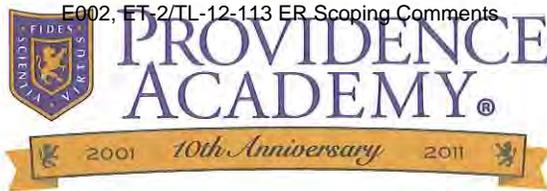
Dear Ms. Steinhauer,

We have been homeowners in Plymouth for 20 years at 15110 44th Ave. N. We have been notified of the proposed installation of high voltage power lines to replace the existing power lines. The proposed 90 foot steel poles will carry 115 kV of power which should not be located in a densely populated residential neighborhood. In the materials and map we received from Excel Energy in July, it is apparent that there are alternative routes for the high voltage power lines that do not go directly through a residential area, wetlands and Turtle Lake Park. These alternative routes are along the 494 freeway, County Rd. 9 and Schmitt Lake Rd. These alternative routes require additional construction and thus result in higher costs to Excel Energy and Great River Energy.

We are concerned about the possible health hazards of the proposed installation of high power lines in our neighborhood and the adjacent Turtle Lake Park and wetlands. We are also concerned about the potential negative impact on property values if the proposed installation of these 90 foot steel poles with 115kV of power occurs in our neighborhood.

Best Regards,

Lloyd Peterson



RECEIVED

NOV 16 2012

MAILROOM

November 14, 2012

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

RE: The Minnesota Department of Commerce Energy Facility Permitting Unit's request for public comments regarding the Certificate of Need application submitted by Northern States Power Company (Xcel Energy) and Great River Energy dated July 2, 2012.

Dear Ms. Steinhauer,

Providence Academy is located on Schmidt Lake Road in Plymouth's first ward. Providence is a K-12 College Prep School with over 900 students. Our interest in the Hollydale project stems from the fact that the current transmission line proposed to be upgraded runs directly through the east side of our 41 acre campus. In fact, there are currently 5 poles located on campus (please see the attached photographs). It is our understanding that the current structures would be replaced with taller, wider poles. Even more concerning, is the fact that the lines would be upgraded from 69kV to 115kV.

Since we opened our doors in 2000, we continue to expand our campus and improve our infrastructure in order to attract new families not only to our school, but to our community. In fact, our future expansion includes a chapel located next to the proposed line. This expansion is difficult with the current structures in place, let alone the proposed upgrade. Providence Academy parents, families and faculty are concerned about the impact the expansion will have on our community of students.

It is our belief that the Northern States Power Company (Xcel Energy) and Great River Energy (Applicants) have failed to meet the criteria outlined in Minnesota Rule 7849.0120 as it relates a certificate of need. Specifically, the accuracy of the applicant's forecast of demand must be called into question based upon a decline in the number of

building permits, along with underperforming population and household projections in the load study area.

Underperforming Population and Household Projections

The Applicants have stated that the purpose of the Hollydale Project is to meet the electrical needs of the Plymouth and Medina areas and provide support for future demand growth in the area until at least 2030. In the Certificate of Need application the Applicants demographic projections are based upon data provided by the Metropolitan Council to the year 2030. This information can be found in Appendix F of the Certificate of Need application.

The Applicants cited projections show an overall population growth in the load study area of 11.79 percent between 2010 and 2020 and 8.24 percent between 2020 and 2030. Moreover, the overall household projected growth is 11.74 percent and 9.95 percent during the same time periods. These projections are illustrated in Table 1 below. The projections call for population increases in 10 of the 13 cities located in the load study area in 2020 and 9 of the 13 cities in 2030.

Table 1: Projected Growth – Entire Load Study Area

	2010 Actual	2020 Projected	Projected Increase between 2010 and 2020	2030 Projected	Projected Increase between 2020 and 2030
Population	173,361	193,805	11.79%	211,200	8.24%
Households	72,377	80,875	11.74%	89,815	9.95%

Source: Appendix F of the Certificate of Need Application

Upon a closer review of the demographic projection data, we discern that between 2000 and 2010 actual population has decreased in 10 of the 13 cities included in the load study area. Moreover, Table 2 further calls into question the reliability of projection data used in the Certificate of Need application. As summarized in Table 2, between 2000 and 2010, the population growth projection data by city was higher than the actual

population growth in every city. Overall actual population growth, between 2000 and 2010, in the load study area was 1.85 percent compared to the overall projected population growth of 6.38 percent.

CITY	2010 Projected	2010 Actual	Difference
Corcoran	5,800	5,379	(421)
Deephaven	3,900	3,642	(258)
Hopkins	17,900	17,591	(309)
Long Lake	2,100	1,768	(332)
Medicine Lake	400	371	(29)
Medina	5,200	4,892	(308)
Minnetonka	51,500	49,734	(1,766)
Minnetonka Beach	610	539	(71)
Orono	8,300	7,437	(863)
Plymouth	73,000	70,576	(2,424)
Shorewood	7,850	7,307	(543)
Wayzata	4,300	3,688	(612)
Woodland	500	437	(63)
	181,060	173,361	(7,699)

Source: Appendix F of the Certificate of Need Application

The same trends hold true for the household data by city. Table 3 illustrates that projected household data by city was higher than the actual household data in every city. Overall actual household growth, between 2000 and 2010, in the load study area was 7.32 percent compared to the overall projected household growth of 10.33 percent.

CITY	2010 Projected	2010 Actual	Difference
Corcoran	1,900	1,867	(33)
Deephaven	1,450	1,337	(113)
Hopkins	8,500	8,366	(134)
Long Lake	900	732	(168)
Medicine Lake	170	160	(10)

Medina	1,760	1,702	(58)
Minnetonka	22,300	21,901	(399)
Minnetonka Beach	230	201	(29)
Orono	3,200	2,862	(338)
Plymouth	29,000	28,663	(337)
Shorewood	2,750	2,658	(92)
Wayzata	2,100	1,795	(305)
Woodland	180	169	(11)
	74,404	72,377	(2,027)

Source: Appendix F of the Certificate of Need Application

Table 4 compares the actual growth between 2000 and 2010 with the projected growth between 2010 and 2030. The magnitude of the discrepancy between the actual increase and the projected increase between 2000 and 2010 calls into question the Applicants projected demand for need beyond 2010. It is our opinion that the projections included in the Certificate of Need application are outdated and underperforming. In turn, the Applicants have failed to establish need based upon the projections included in the application.

	Projected Increase between 2000 and 2010	Actual Increase between 2000 and 2010	Projected Increase between 2010 and 2020	Projected Increase between 2020 and 2030
Population	6.38%	1.85%	11.79%	8.24%
Households	10.33%	7.32%	11.74%	9.95%

Source: Appendix F of the Certificate of Need Application

Building Permit Decline

Another factor to be considered when discussing projected population growth is the number of building permits. Between 2003 and 2010, there were a total of 257 non-residential building permits in the load study area. Of those permits, 83 percent were

issued between 2003 and 2007. Moreover, in 2010 there were a total of seven non-residential building permits. This represents an eight year low.

Not only are non-residential building permits trending lower, residential building permits are also on a downward projection. Of the 5,881 residential building permits between 2002 and 2010, 88 percent came between 2002 and 2007. Five of the 13 cities located in the load study area were at an all-time low for residential building permits in 2010. The decline in permits also coincides with the economic downturn that occurred in 2008.

	2002-2007	2008-2010
Non-residential*	214	43
Residential	5,144	737

Source: Appendix F of the Certificate of Need Application.
*Non-residential permit numbers are from 2003.

Once again the accuracy of the applicant's forecast of demand must be called into question based upon the following factors: 1.) underperforming population and household projections, 2.) building permit decline. Moreover, the entire load study area is made up of western Minneapolis suburbs and for the first time in more than 100 years, census data shows that cities are growing faster than the suburbs, which calls into question the need for the entire project as proposed.

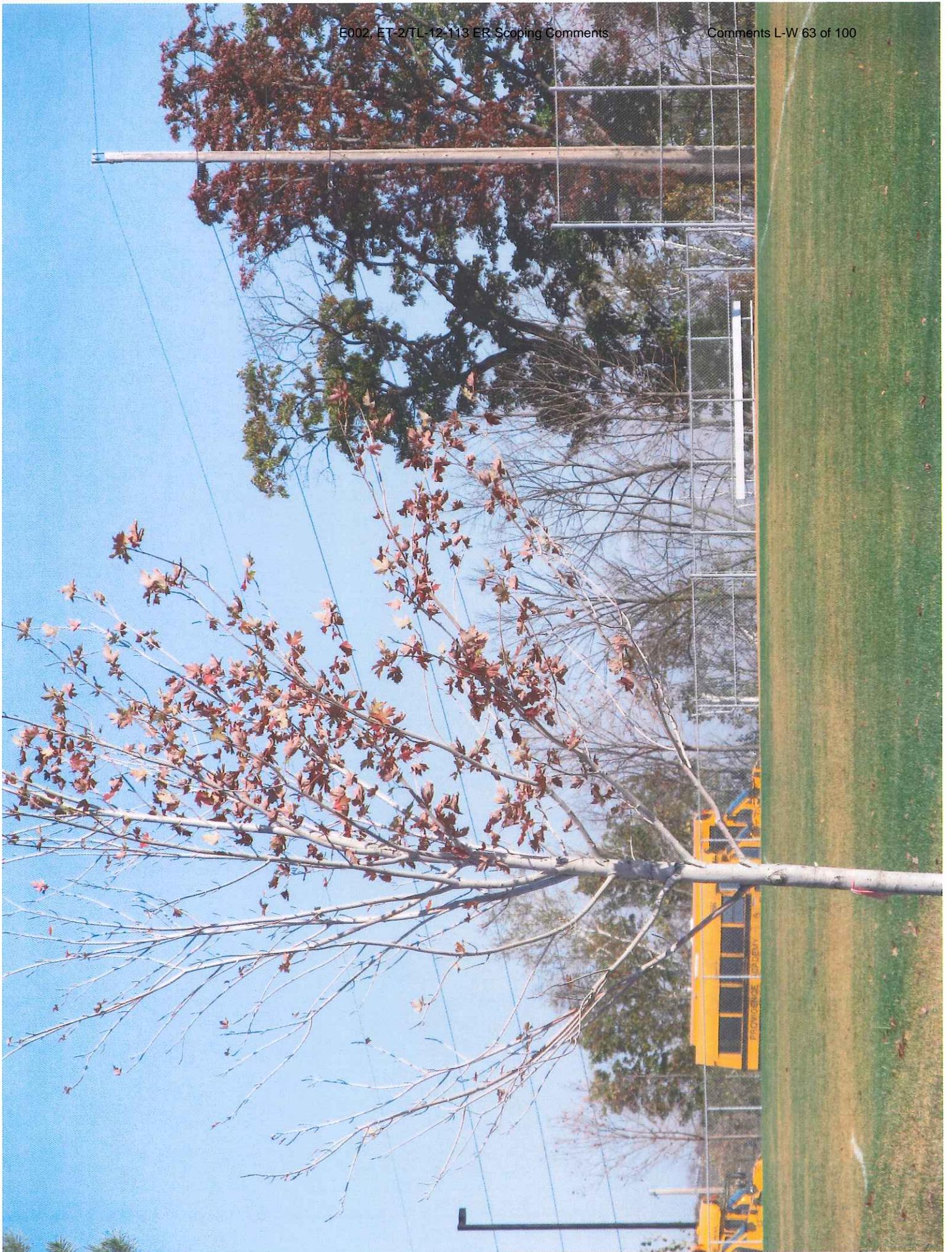
Thank you for your time and consideration. We look forward to working with all interested parties to achieve a commonly desired outcome.

Sincerely,

Patricia O'Donnell
Director of Buildings and Grounds

:enclosure











From: [Carolin Raber](#)
To: [Steinhauer, Suzanne \(COMM\)](#)
Subject: Hollydale 115kV HVTL
Date: Thursday, November 01, 2012 8:44:34 PM

We MUST keep in mind what is best for Plymouth residents. To have these huge power lines in the neighborhood, will greatly reduce the property value where it is running, but also the entire Plymouth area surrounding this monster. I frankly do not understand why it is even thought of to put these wires above ground, when it would benefit everyone to bury the lines. I know that the cost is more. However, in the long run it will cost no more than the revenue the city of Plymouth will lose if the lines are put above ground. I think by now it is very clear that no one wants these high voltage lines in their back yard not only would their homes be impossible to sell, add the health risks this causes. Does the city want to lose all of these tax dollars you now are receiving? or the health issues that will arrive from having these electrical wires so close to one's home, or schools?? We moved to this city, because of the beauty of the city, the good schools, and just a safe place to live. I pray that you will consider long and hard as to what is best for the city of Plymouth and your residents who trust you to do the right thing and protect us from financial ruin and huge health issues that will harm the residents of all ages of the city of Plymouth.

Sincerely,

Carolin and Rod Raber

16245 38th Place North

From: kranallo@comcast.net
To: [Steinhauer, Suzanne \(COMM\)](#)
Subject: Hollydale 115 kv Project
Date: Sunday, November 04, 2012 11:36:21 AM

To Suzanne Steinhauer:

I have attended all of the public hearings regarding the Hollydale 115 kv Project and I am writing to you regarding the Certificate of Need and other solutions.

My first suggestion is to forget this project as I have read recently Xcel Energy will be asking for rate increases because of lack of demand. Your department has stated all along that these power lines are needed to meet the demands of our community. I do not feel that this is true, especially with the recent news articles. It is stated in these articles that the rate increase is partly due to keep the two Minnesota nuclear power plants operating. This has nothing to do with the Hollydale 115 kv Project, therefore I cannot connect the dots and am trying to understand why this additional power is needed. I don't believe there is a need for it.

In another article it is stated that Great River Energy is expecting tepid growth in electrical demand. It is also stated that the collapse of the housing market pulled the plug on demand for more electricity. Existing generating capacity can meet future need, also quoted by Great River Energy.

You will have a difficult time proving to me that there is a need with these quotes directly from the energy companies.

We have 69 kv power lines running through our backyard that are not in use. Please take these down. It is ridiculous the lengths the energy companies go to to try to pull the wool over consumers eyes. We are a smart community and will keep up with your every move. We do not feel these 115 kv lines are necessary and do not want them.

At the very least, any new lines should be put underground for aesthetics and for safety and health concerns of the community.

Kathy Ranallo
16215 38th Place North
Plymouth, MN 55446

763-553-9442

From: [Becky Reinemann](#)
To: [Steinhauer, Suzanne \(COMM\)](#)
Subject: Stop the Hollydale 115kV HVTL
Date: Tuesday, November 13, 2012 4:22:42 PM

Dear Suzanne Steinhauer,

I live in Plymouth near the proposed site of the Hollydale 115kV High Voltage Transmission Line. I am writing to express my concern with the proposed path for this line. The portion near me is an area that contains single family homes and marshes. I can't imagine a power line of this level cutting through our neighborhood. There are many children in the area as well as a school. I have concerns about the EMF – electromagnetic force for those living near the lines as well as children playing or adults walking or biking near them. I also have concerns about property values and the overall appeal of our neighborhood. It will have a negative impact on the aesthetics of the neighborhood as well as the wetlands.

I am not familiar with city planning, but it seems to me this level of a power line would be better placed away from residential housing. It seems that this type of a line would be better placed next to a major road like Hwy 55 where there is less residential impact.

Thank you for accepting my input.

Sincerely,
Becky Reinemann
18940 33rd Ave N
Plymouth, MN 55447

From: [Barbara Reis](#)
To: [Steinhauer, Suzanne \(COMM\)](#)
Subject: Environmental concerns regarding Holly Creek
Date: Thursday, November 15, 2012 1:30:22 PM

To whom it may concern:

With regards to the proposed transmission lines in Plymouth, MN, specifically the Holly Creek neighborhood, we wish to weigh in with several concerns and a solution that will address them: specifically, to bury the power lines.

Point number one is that science is taking notice and evidence is accumulating knowledge that link magnetic fields from power lines to adverse effects on human health. Since the area is heavily populated with single family homes and townhomes and there are two elementary schools also in the area MANY children and adults will be adversely affected.

Point number two is with respect to our latest super storm (Sandy) in the northeast--in areas where the power lines are buried, there was little or no disruption of power to the communities. This option is a win-win, for the homeowners and businesses who were able to carry on, and for the power companies who could muster their manpower and mobilize them to areas with overhead lines that needed extensive repair.

In this day and age--knowledge of the detrimental effects of electropollution as well as more potential violent weather (think blizzards and tornadoes in MN), we must be forward thinking. Therefore, the option to route the electrical lines down Hwy 55 and underground are the most reasonable and logical method to use.

Thank you.

Barbara Reis
Jack Reis

Bny topic you would like included in the scope of the ER: effects of electromagnetic force ("EMF") on human health with specific focus on children - as at least two educational institutions may be directly affected, socioeconomic effects with specific focus on direct and indirect property devaluation and corresponding loss of revenue to the cities, safety, aesthetic and noise effects, effect on wetlands, etc



ENERGY FACILITY PERMITTING ENVIRONMENTAL REPORT SCOPING COMMENT FORM

Hollydale 115 kV HVTL Project PUC Docket: E002, ET2/CN-12-113

Name: Jean W. Scheu Address: 1170 No Evergreen Ln City: Plymouth State: MN ZIP: 55441

Please share your comments and suggestions on the potential issues, impacts, and alternatives that should be considered in the Environmental Report to be prepared for the Certificate of Need for the proposed Hollydale 115 kV HVTL Project.

You may turn in this form tonight or mail it to the address provided (use additional sheets as necessary). You may email comments to Suzanne Steinhauer, State Permit Manager, at suzanne.steinhauer@state.mn.us or fax to (651) 296-2888, with CN-12-113 in the subject line. Comments must be received no later than 4:30 PM, Friday, November 16, 2012.

November 3, 2012

RECEIVED

Mn Dept of Commerce Energy Facility Permitting Environmental Report Scoping Comment Form

NOV 6 2012

MAILROOM

Hollydale 115 KV HVTL Project PUC Docket : E002, ET2/CN-12-113

I have attended three meetings where this project was discussed. After listening to all sides, it is apparent to me and I hope to the Dept of Commerce that the new power lines should be along Highways 494 and 55 and they should be buried. The 69 V power lines which now travel through many back yards should be removed. This is the gist of the testimony which was repeated many times. It may change the whole project into a different category but that may be what should occur.

Thank you for your attention to this opinion.

Sincerely,

Jean W. Scheu (handwritten signature)

Jean W. Scheu 1170 North Evergreen Lane, Plymouth, MN 55441-4834

Date: 11-3-12 (handwritten signature and date)

From: [Nancy](#)
To: [Steinhauer, Suzanne \(COMM\)](#)
Subject: PUC Docket No. CN-12-113
Date: Wednesday, November 14, 2012 9:27:41 AM

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,

Nancy Setzler

3913 Everest Ln N, Plymouth, MN 55446

From: [Nancy](#)
To: [Steinhauer, Suzanne \(COMM\)](#)
Subject: Hollydale 115kV
Date: Friday, November 02, 2012 6:18:50 AM

Hi,

I want to express there has been a lot of factual documentation showing the negative health impact from power lines to near residents, including cancer.

The health impact is of the main importance, but it also affects home values; anyone who is in the know about this will not buy.

Nancy Setzler
3913 Everest Lane
Plymouth, MN 55446

From: [Dale Stover](#)
To: [Steinhauer, Suzanne \(COMM\)](#)
Subject: Hollydale 115kV HVTL
Date: Friday, November 02, 2012 11:26:27 AM

Hello Suzanne,

My name is Dale Stover. I live in Plymouth and have many concerns about the future placement of the Hollydale power line and the affects it may have on the citizens of Plymouth.

The biggest concern I have is in regards to the health issues it may or will cause down the road, mainly to our children. I believe where there is smoke there usually is fire, and with the studies that have and are being done on the human health risk from power lines that it will be just a matter of time before this become a bigger health risk. As you know, studies take time and it's unfortunate that people are usually the Guinea pigs. I know sometimes it the only choice we have to meet the growing needs of the people but when we start to see potential issues, we need to do everything we can to help eliminate the risk.

The current line runs through my back yard right now and if this line stays in place and are upgraded to the bigger lines it will force me to sell, I cannot take the risk of what it could do to my family. When I bought my home I did research on the current line and from what I found, the studies that were being done were on the higher voltage power lines and that the lower voltage power line had very little or no impact to health issues. I also was told that the line was not in use all the time and that it was used only when higher peaks came along.

Since there is the opportunity to run the lines where it would not affect property values and potential health options, I cannot begin to imagine why you would not place them in that location.

Thank you for listening, and I hope you truly consider routing this line along the highways for everybody's wellbeing.

Thank You and Take Care,

Dale Stover
763-550-9768

This electronic message including any attachments ("Message") may contain information that is privileged, confidential and/or exempt from disclosure under trade secret and other applicable law. If you are not the intended recipient, notify the sender immediately, permanently delete all copies of this Message, and be aware that examination, use, dissemination, duplication or disclosure of this Message is strictly prohibited.

November 12, 2012

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

RE: Hollydale Transmission 115kV Power Line – Certificate of Need

Dear Ms. Steinhauer,

My name is Victoria (Vicki) Swisher and I am a 13-year resident of 4155 Minnesota Lane North in the beautiful Kingsview Heights neighborhood located in the heart of the national award-winning city of Plymouth.

In the case of the applicants' Certificate of Need submission, while I will not weigh in on specifics around level of usage, energy shortfalls or the like, I would urge the PUC to consider solving for these kinds of energy issues from a broader perspective. It is 2012 and well past the time to default to the easy, 'cheap', short-term solution for energy issues. How "need" is determined and how alternatives are evaluated must be viewed with a new lens, a broader perspective than simply to exploit existing right-of-ways on old, 69KV lines. Proceeding with the standard, traditional solution in this instance, when there is so much opposition based on the significant detriment to quality of life for hundreds of residents, should not be the default but rather the last resort.

In the case of the Hollydale project in particular, the equity in proceeding in a 'business as usual' way is untenable for the following reasons (among others that fellow citizens have already voiced).

This project represents:

- **Unprecedented** infringement on residential property for the City of Plymouth. According to a September 2011 report provided by Xcel Energy which detailed the Land Use of Residential versus Non-Residential (in mileage) of 115kV lines in the 7 county metro area, 115kV lines through residential areas account for just 84.3 miles as compared to 522.6 miles for Non-Residential areas. These figures constitute a **6:1 ratio** of Non-Residential to Residential 115kV transmission lines currently. In contrast, the Hollydale Project "Proposed Route", should it be adopted, would constitute close to a **1:1** ratio since approximately **50%** of the transmission lines would run directly through residential neighborhoods. Further, the structural figure examples that Xcel provided in its application and fact sheet for residents (which show examples of the steel pole structures), **only** show these poles placed on roadways, rural roads, or highways.

- **Significant property value losses** for hundreds of Plymouth and Medina residents. In Plymouth alone, conservation estimates due to cumulative **\$8 million** loss in home value for 400 directly impacted homes (based on estimated minimum 10% home value decrease. Further, Xcel Energy provided maps of other neighborhoods in Hennepin County with 115kV lines. It is noteworthy that **all** of these neighborhoods are A. significantly older and B. of lower average home value than those along either the proposed or alternate routes for the Hollydale project. **NOTE:** Some residents concerned with alternative routes being considered have speculated that the citizens with homes along the existing, largely inert 69KV line “knew the risks, knew what they were getting into” or “paid a discounted price for their homes so property value loss is already accounted for.” It is important to note that, as one of those homeowners and from many conversations with neighbors in similar circumstances, these speculative comments are unfounded. I purchased my home in 1999. The easement was secured in either 1969 or 1971 for a 69 kV line. Nowhere in that document was it set forth that the purchased easement covered potential upgrades to a more high voltage line. My fellow neighbors and I did not pay a discounted price for our homes. In short, my family and others directly impacted did not sign up for a 115kv or other high voltage line, when we purchased our property.
- **Environmental, Aesthetic, and Cultural Value degradation** to directly impacted areas and immediate surrounding areas.
- **Health Risks** to Plymouth citizens caused by prolonged and close exposure to EMF. While groups with vested interest in disproving the health risks certainly will detract from these assertions, there is nevertheless persistent evidence of these risks that cannot be ignored.

Summarily, Xcel is operating in the interest of expediency and cost control. Both are short-term perspectives. Should this project be allowed to proceed, hundreds of citizens and the cities in which they reside will suffer from long-term, ongoing negative impact in service to this short-term perspective.

Minnesota as a leader in environmental solutions should be at the forefront of innovation. Xcel and GRE and the PUC should support nothing less than vigorous exploration of alternative, innovative solutions in this case. The same old way will only perpetuate corporate stereotypes. The applicants have a rare opportunity to distinguish themselves as forward-thinking, broad minded, fellow citizens - balancing short-term profits with what is without question the right thing to do, both short-term and long-term.

Thank you.

Sincerely,



Victoria Verrico Swisher

From: [Andy Swisher](#)
To: [Steinhauer, Suzanne \(COMM\)](#)
Subject: Hollydale Transmission Line Project - Certificate of Need
Date: Thursday, November 15, 2012 11:36:30 AM

Hello,

My name is Andrew Swisher. I'm 16 years old and have lived at [4155 Minnesota Ln N](#) since I was 2 years old. The Application for a high voltage power line brought by Xcel Energy would in effect run right through my back yard.

If this project is approved it will decrease significantly the value of our home. The outcome would ultimately lead to us leaving our home and leaving all of the great memories of my childhood. Other kids like me have moved around at least once or twice but for me that just isn't the case. When I think of home I imagine the house I have come to love. Please find alternate ways to solve this energy issue. If Powerlines are the only option, keep them away from houses or bury them underground so that no one has to leave their home.

Sincerely,

Andrew Swisher

" it's not the house we love, it's the life we live within it."

Greetings,

My name is Katelin Swisher. I am writing in response and rebuttal to the proposed Holy Dale project introduced by Xcel Energy. My place of residence- my home, my treasure, and my foundation- is the big blue house on the top of the hill, 4155 Minnesota Lane N, Plymouth. I have been living in this house since I was 6 years old and I am currently 19 years old. This has been my home for 13 years of my life. I have never moved from this house and hardly remember my houses before this one. Therefore, this is the only true home I know. If put into effect, the Holy Dale project would be tragic for the dozens of families living in the targeted area. Any and every family would be affected- the senior couple who has lived in their home for 40 years, the new couple who finally found that perfect house to raise their child in, or even that hard-working man who prides himself in his beautiful backyard garden. If these new power lines were put into place, not only would these homes lose their property value, the value of the lives lived and the memories made in these homes would be lost as well. I can remember sledding down our huge backyard hill and then running inside with a wet nose and rosy cheeks to slurp down my hot chocolate. I can remember burying my gerbil, Snowflake, by the marsh behind our home. I can remember playing basketball on my driveway and inviting the neighbors over to share in our good time. I can remember when we remodeled our basement into a game room. I can remember saying goodbye to my dog Licorice in the kitchen. I can remember coming off the school bus my last day of 5th grade, 8th grade, and driving home on the last day of school when I finished 12th grade. This is the home I grew up in. This is the home where I found myself. To do this to anyone, no matter what the cause or reason, is ridiculously unkind and unfair. If such power lines must be introduced into these already charming and family-filled neighborhoods, then I suggest we use a different method of approach. One such example would be spreading the power lines across Highway 55. Another would be to build these powerlines underground. Don't destroy the properties of people's homes. Work to find another solution. Let the homes that created the joyous memories for every 2, 17, 45, and 73 year old stay beautiful and untampered with forever.

From: [Matthew Varas](#)
To: [Steinhauer, Suzanne \(COMM\)](#)
Subject: PUC Docket No. CN-12-113
Date: Monday, November 12, 2012 5:36:20 PM

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,
Matthew Varas
3957 Garland Lane North
Plymouth, MN 55446

From: thomas.vertes@usbank.com
To: [Steinhauer, Suzanne \(COMM\)](#)
Subject: Xcel Energy Hollydale Project
Date: Monday, October 29, 2012 12:37:58 PM

Dear Ms. Steinhauer;

Unfortunately, I was unable to attend the meeting at the Plymouth Creek Center due to my work commitments, however I would like to address the issue with my comments.

Basing my concern from the location of my home, I still strongly suggest that the alternative route from Schmidt Lake Road south on Hwy. 494 to the intersection of Hwy. 494 and Hwy. 55 and then turning west following Hwy. 55.

I feel that this would be the best solution both esthetically and economically (since the minimally additional cost would be recovered fairly quickly by Xcel in a short time-span) It would also eliminate a large population of concerns especially when it is related to residential and environmental areas, and the health of the effected population.

I attached my previous letter for your review:

June 15, 2011

From: Tom Vertes
4710 Orchid Lane North
Plymouth, MN 55446

RE: PUC Docket No. E002/TL-11-152

I would like to state that I am for the Hollydale Project if it is for the betterment of the Plymouth community and back the Hwy. 494 and Hwy. 55 route as was unanimously recommended at the meeting.

Without restating the various health related issues that have been addressed in previous letters and comments from effected residents in the neighborhoods (refer to PUC edocket #11-152) and which all agree upon, my focused concern is the esthetic and valuation of the properties when a clearly acceptable alternative route is available.

The proposed route labeled "Route E" as I understood from the meeting would run along an existing highways and by commercial properties that have power-lines in there vicinity, and would not adversely effect their operations in either an economic, visual or operational manor.

The new poles according Mr. Sedarski, Permitting for Xcel, would be 90" steel and would need an 8' excavation per pole to set a concrete footing/base. I have only seen these poles by highways and railroad tracks, never in residential areas. These are the same poles that are at the north-east corner of the intersection of Interstate 494 and County Road 9 by the super-Target. In addition, the easement would increase to 38' from center to possible as much as 100', depending on the area, this change is significantly greater than the current allowable right-of-way.

Reviewing Xcel's own comparison of the proposals there would be at least 90 homes effected. Xcel has stated that it promotes an effort to maintain good community and public relations it would be in their best interest to plan a route with minimal environmental, public and visual impacts.

Also, I have recently spoke with a number of realtors regarding the marketability of a home with a high voltage power line running beside it and was shocked that valuations would decline 10% to 20% of fair market pricing. Translating the costs in a very conservative manor as follows, using the base of 90 homes being affected at an average fair market price of \$250,000. $\$250,000 \times 15\% = \$37,500$ for a total of \$3,375,000. This would significantly effect the Plymouth tax base.

 Follow-up letter

RE: Hollydale Project 2011

The main point of this communication is to make yourselves aware of the effects that Xcel's Proposed Line Segment A will do to the Orchid Lane North, Minnesota Lane North and Niagara Lane North neighborhoods.

Xcel has submitted Proposed Route Segment A as their main line through the area with a alternative designated as Alternate Route Segment A both would connect at County Road 9 to their Proposed Route Segment B. Looking at this map it would appear that the Proposed Segment A runs through a residential area, whereas the Alternate Route Segment A runs parallel to a highway. Which makes more sense?

The new poles according Joseph Sedarski, Permitting for Xcel, would use the existing pole locations if the preferred route is used. However, in reading the project outline the new poles (90" steel) will need an 8' excavation per pole to set a concrete footing/base. If Xcel needs to re-drill the holes, remove the old poles and restring the lines it again would make more sense to run the line by the interstate (494). I have only seen these poles by highways and railroad tracks, never in residential areas. These are the same poles that are at the north-east corner of the intersection of Interstate 494 and County Road 9 by Target.

In addition, the easement would increase to 38' from center to possible as much as 100', depending on the area, this change is significantly greater than the current allowable right-of-way. Reviewing Xcel's own comparison of the Proposed and Alternate A's the effected household are 3 times greater (90 vs. 30). If Xcel promotes an effort to maintain good community relations would it not be to their betterment to plan a route with minimal opposition.

Finally, using the cost basis that Xcel submitted through Briggs and Morgan the difference in using Alternate Route Segment A is only \$200,000, which is approximately 2 1/2% of the total project cost. Based on Xcel's historical billings and the longevity of the project this could be recovered quickly.

Summary, I have spoken a few of the City of Plymouth departments (planning and development) and they inferred that the City in general does not get involved with such matters. However, I feel that they should be aware of issues affecting the citizens of

Plymouth and the individual communities.

I have recently spoke with a number of realtors regarding the marketability of a home with a high voltage power line running beside it and was shocked that valuations would decline 10% to 20% of fair market pricing.

Translating the costs as follows:

- 1) Using the base of 60 homes being effected at an average fair market price of \$250,000.
\$250,000 x 10% (or 20%) = \$25,000 to \$50,000.
- 2) The cost differential for Xcel using Alternate Route Segment A vs. Preferred Route Segment A is \$200,000. \$200,000/60 homes = \$3,333.
- 3) Difference per home \$25,000 to \$50,000 versus \$3,333.

Conclusion:

How would this effect the City of Plymouth?

- 1) Lower home values would decline on homes on Orchid Lane North, Minnesota Lane North and Niagara Lane North creating less tax revenues.
- 2) Lower home prices would lower taxes received by the City of Plymouth and Hennepin County.
- 3) Homes in the immediate proximity of these lanes would also receive a cascading effect of the lowered prices.
- 4) Numerous unhappy residents.

Thank you in advance for reading this letter and reviewing the attached information. I would appreciate your feedback and comments.

Thank you,

Tom Vertes
4710 Orchid Lane North
Plymouth, MN 55446

U.S. BANCORP made the following annotations

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From: apache@web.lmic.state.mn.us
To: [Steinhauer, Suzanne \(COMM\)](#)
Subject: Waaraniemi Thu Nov 15 18:26:51 2012 E002, ET2/CN-12-113
Date: Thursday, November 15, 2012 6:27:55 PM

This public comment has been sent via the form at:
mn.gov/commerce/energyfacilities/publicComments.html

You are receiving it because you are listed as the contact for this project.

Project Name: Hollydale 115 kV Transmission Line Certificate of Need Docket

Docket number: E002, ET2/CN-12-113

User Name: Paul Waaraniemi

County: Hennepin County

City: Plymouth

Email: pwaaraniemi@gmail.com

Phone: 7632452335

Impact: As a longtime Plymouth resident who lives along the current route of the unused 67Kv power line that Excel proposes to boost to 115Kv through a populated neighborhood, my neighbors and I demand an exhaustive EIS that addresses the following areas of negative impact: homes/yards, schools, playgrounds, sportsfields, walking trails/paths, parks, wetlands, flora and fauna, but most of all children and people in general. The fact that the current power line has sat unused for 8 years calls into question the stated need that Excel cites.

Mitigation: While I dispute the purported "need," the first concern to mitigate impacts in any such project is to locate any above ground power line in non-residential areas. Routing along highways, railroad beds, over open fields, etc. are obviously preferred. If any segment of a needed power line must go through high voltage areas, power lines in residential areas must be buried. Please decipher what was hidden by footer.

Submission date: Thu Nov 15 18:26:51 2012

This information has also been entered into a centralized database for future analysis.

For questions about the database or the functioning of this tool, contact:

Andrew Koebrick
andrew.koebrick@state.mn.us

From: [Laura Warner](#)
To: [Steinhauer, Suzanne \(COMM\)](#)
Subject: Xcel Energy's Hollydale Project
Date: Sunday, November 04, 2012 7:55:57 PM

Dear Ms. Steinhauer,

I am a resident of Plymouth. I was unable to attend the public scoping meeting regarding the Xcel Energy's Hollydale Project. I have attended multiple public information meetings about this project, and I am very concerned about the proposed route. The projected line is extremely close to my home. I am concerned about unknown health risks to my family, friends, and pets. I am concerned about the value of my home if this project were to be implemented. I am disturbed as to the potential impact to my backyard that has a beautiful wetland, nice trees, and numerous animals. I recently saw a deer pass by my home.

Why should this Line pass through an area that is densely populated in several places (i.e. the power lines would run extremely close to homes and townhomes) and may present a health threat to humans and pets? The citizens of Plymouth have spoken and are against the proposed line and are generally in agreement with the alternative route (more or less follow along Highway 55 and avoid excessively close passage by homes and townhomes). I also understand that the City of Plymouth is in support of these citizen concerns and also supports the alternative route. I respectfully ask that you view these comments in the spirit in which they are intended and representative of a consensus of citizens who live in the area.

Please see attached photos reflecting how close the line would be to my home as reflected from the walk out, deck, and upstairs windows.

Thank you for your consideration.







Laura Warner
Home - 763-383-1240
Cell - 612-203-1149

Please visit my LinkedIn account at:
www.linkedin.com/in/lauradwarner

From: [Laura Warner](#)
To: [Steinhauer, Suzanne \(COMM\)](#)
Subject: PUC Docket No. CN-12-113
Date: Tuesday, November 13, 2012 11:08:25 AM

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.

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

Sincerely,

Laura Warner

Home - 763-383-1240

From: pjwarosh@mombrands.com
To: [Steinhauer, Suzanne \(COMM\)](#)
Subject: Holydale 115K volt Project
Date: Friday, November 16, 2012 10:46:18 AM

Suzanne,

I am sending my concerns and what should be included in the environmental review study for need pertaining to the proposed Holydale 115K volt project:

- 1) Effect of electromagnetic force (EMF) on human health of children and aging adults. Adults with compromised immune systems, pacemakers, cancer treatment, ect.
- 2) Proposed route goes across two school playgrounds and a long pathway, long term effects on children that go to these schools or use the pathway.
- 3) Increased noise pollution.
- 4) How many homes are effected and how close they are to homes. Property value of homes, damage to homes from power lines. Will trees on current property have to be removed to install new power lines. My back property lines are filled with mature trees that I am afraid I will loose if this goes thru.
- 5) Impact to nature, wetlands, ect

Thanksm

Paul & Angela Warosh
4720 Orchid Lane N
Plymouth, MN 55446
763-559-5241

From: [Erik Wegener](#)
To: [Steinhauer, Suzanne \(COMM\)](#)
Subject: PUC Docket No. CN-12-113
Date: Monday, November 12, 2012 4:24:58 PM

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.

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

Sincerely,

Erik Wegener

From: [Laura Wegener](#)
To: [Steinhauer, Suzanne \(COMM\)](#)
Subject: PUC Docket No. CN-12-113
Date: Monday, November 12, 2012 4:23:53 PM

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.

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

Sincerely,

Laura Wegener

From: [Elizabeth Weir](#)
To: [Steinhauer, Suzanne \(COMM\)](#)
Subject: Hollydale Scoping Comment Form
Date: Tuesday, November 13, 2012 11:32:00 AM

November 13, 2012

<!--[if !supportEmptyParas]--> <!--[endif]-->

Suzanne Steinhauer

State Permit Manager

Minnesota Department of Commerce

85 7th Place East, Suite 500

St. Paul, MN 55101-2198

<!--[if !supportEmptyParas]--> <!--[endif]-->

Re: PUC Docket No. CN-12-113 – Hollydale 115Kv Transmission Line Project

<!--[if !supportEmptyParas]--> <!--[endif]-->

Ms. Steinhauer,

<!--[if !supportEmptyParas]--> <!--[endif]-->

This letter is in reference to the Environmental Report Scoping Comments for the Hollydale 115 Kv Transmission Line Project in Medina.

<!--[if !supportEmptyParas]--> <!--[endif]-->

Firstly, I wish to support the need for some degree of an upgrade in electricity to supply reliable power for our businesses and high-density residents on the east end of Highway 55 in the City of Medina. While campaigning, I learned that the elevators are unreliable in our 87-unit, three story-high, retirement cooperative, Gramercy, due to electrical outages. These same outages affect Target in Medina, where fresh produce has to be dumped due to loss of refrigeration. Highway 55 Rental reports loss of business due to outages.

<!--[if !supportEmptyParas]--> <!--[endif]-->

Secondly, I support the City of Medina's letter to you that addresses the concerns of residents along the utility line as follows:

<!--[if !supportEmptyParas]--> <!--[endif]-->

To alleviate health risks associated with proximity to electromagnetic field exposure (EMF) due to the proximity of the Hollydale transmission line to some Medina homes, and to help preserve the property values of those homes, the Medina City Council at their November 7, 2012, meeting directed staff to send a letter advocating that the Public Utilities Commission (PUC) should:

<!--[if !supportEmptyParas]--> <!--[endif]-->

- bury the transmission lines underground if they are within 300 feet of residences at the cost of the utility, or shift the easement to avoid such proximity;
- bury the lines where future, high density residential development is probable on the eastern end of the line through Medina;
- install single pylon poles to support the transmission lines through the City of Medina, in order to limit future upgrades to no more than 115

Kv;

- insulate the lines to reduce the impact of electromagnetic fields on residents and property, if this is possible;
- explore alternatives, which permit use of the installed infrastructure but that would carry a lower additional voltage than the proposed 115 Kv.

<!--[if !supportEmptyParas]--> <!--[endif]-->

The Medina City Council supports these recommendations to make the Hollydale project as safe as possible for our residents.

<!--[if !supportEmptyParas]--> <!--[endif]-->

The Council also acknowledges the need for a reliable supply of power to our businesses on Highway 55 and to the 87-unit Gramercy housing cooperative on Highway 55.

<!--[if !supportEmptyParas]--> <!--[endif]-->

Thank you for your outreach on this important issue.

<!--[if !supportEmptyParas]--> <!--[endif]-->

<!--[if !supportEmptyParas]--> <!--[endif]-->

Elizabeth Weir,

City Council Member,

1262, Hunter Drive,

Medina, MN 55391



ENERGY FACILITY PERMITTING
ENVIRONMENTAL REPORT
SCOPING COMMENT FORM

Hollydale 115 kV HVTL Project
PUC Docket: E002, ET2/CN-12-113

Name: DRK WEITZEL
Address: _____
City: _____ State: _____ ZIP: _____

Please share your comments and suggestions on the potential issues, impacts, and alternatives that should be considered in the Environmental Report to be prepared for the Certificate of Need for the proposed Hollydale 115 kV HVTL Project. Suggestions can be directed toward alternative means meeting the stated need for the Project.

You may turn in this form tonight or mail it to the address provided (use additional sheets as necessary). You may email comments to Suzanne Steinhauer, State Permit Manager, at suzanne.steinhauer@state.mn.us or fax to (651) 296-2888, with CN-12-113 in the subject line. Comments must be received no later than 4:30 PM, Friday, November 16, 2012.

WHY NOT BUILD A ~~SUPPLEMENTARY~~^{EN}
SUPPLEMENTARY LINE WITH 1/2 THE
POWER* OF THE PROPOSED LINE?
* (OR ANOTHER 69 KV LINE)

DUE TO THE POSSIBLE DETRIMENTS
OF THE LARGER 115 KV LINE.

Signature: Date: 10/26/12

From: [Jessica Wells](#)
To: [Steinhauer, Suzanne \(COMM\)](#)
Subject: PUC Docket No. CN-12-113
Date: Thursday, November 15, 2012 11:22:10 AM

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.

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

Sincerely,

Jessica Wells
16817 39th Ave N
Plymouth MN 55446

From: [Patrick White](#)
To: [Steinhauer, Suzanne \(COMM\)](#)
Cc: patmplsmn@live.com
Subject: PUC Docket No. CN-12-113
Date: Friday, November 09, 2012 9:36:40 PM

Dear Ms. Steinhauer:

We've been told by Xcel Energy for many months that the Hollydale 115kV high voltage power line is needed to fix a distribution problem in the Plymouth area. We were never presented any options other than route options, and were continually told that "no build" was off the table and could not even be discussed. Now we very recently learned at the public meeting on October 26 that there ARE very low voltage solutions, less than 14 kV, that will fix the supposed distribution problem and run along established major highways passing commercial development. A low voltage feeder system seems like a wise and cost effective solution, and it sounds like the way distribution problems should be fixed. We wonder why this alternative was buried and only by the due diligence of nearby residents were these alternatives uncovered. These are listed as Alternatives A2 and A3 in document number 20127-76388-02 starting on page 58.

Also, the simultaneous scheduling of the Certificate of Need and the routing process doesn't make any sense to us either. It seems like this belittles the Certificate of Need process and that the conclusion to this process is somehow predetermined to show need for a 115 kV power line.

Now we've just read a cover story in the newspaper which notes Xcel's request for a rate increase, in part to make up for slack demand, with electricity revenues DOWN 4% since their last rate hike (Star Tribune, Saturday, November 3, page 1). If overall demand is actually down, not up, why is any kind of new line needed in the first place?

Why should our concerns matter in this issue? We are the residents at 3961 Garland Lane North in Plymouth. An Xcel representative showed us their survey of the right-of-way of the current line they want to replace, at a November 23, 2010 open house. It indicated that the closest dwelling to the line is that of our next-door neighbor, on the other side of the line at 3963 Garland Lane North—at a length of 20 feet. However, the side of our neighbor's dwelling closest to the line is actually their 3-car garage. We'll note that as far as actual living spaces go, ours is by far the one most likely to be the closest on the entire right-of-way—at a length of only 30 feet! If we want to look at the actual wires we can't look out...we have to look UP to see them. They are THAT close to our kitchen and family room.

Of course we knew the line was there when we moved in as our townhome's first and only owners in 1999 after it was built. We also knew that it was a LOW voltage power line, like many others that run through residential neighborhoods. Never in our wildest dreams could we imagine that Xcel would possibly want to, and heaven forbid could possibly have the right to, replace it with a HIGH voltage power line. We assumed that by the dawn of the 21st century the applicable government agencies (the PUC and the city and county housing authorities) created to protect citizens like us actually worked together to do just that. Under that assumption, the regulatory agencies either wouldn't allow voltage levels to be increased along this path to such a large degree, or wouldn't have even allowed our building and all the other residential dwellings around here to be built where they are, given the still-uncertain effects of high-voltage EMFs at this point in time. To assume otherwise is to assume a major failure of state and local governments to do their job. At the November 23, 2010 open house we were told that the right-of-way for this line should be no less than 70 feet between buildings, but again, by us it is actually about 50 feet.

At the two open houses Xcel held in the fall of 2010, we asked their reps several other questions about the proposed line, getting less than satisfying answers. We asked at the first one about the

design of the poles. They confirmed that the poles contained five-foot arms on each side, which would move the line wires even closer to our house. At the second open house the pole design had changed, moving the wires back closer to the poles, but they couldn't confirm which design would ultimately be used. We asked about line buzzing. The answer given was that it is a strong possibility! We also specifically asked about EMF and the closeness of the line to our home. The rep responded with disgust that the question was even asked and then side-stepped it altogether.

At the later public comment meeting we attended, only upon direct questioning by another attendee did Xcel address the issue of EMFs. Their representative that night cavalierly stated that no EMF activity can be detected at a length of 300 feet from a high-voltage power line. That may be of some comfort for those who live beyond that distance. But for the countless residents like us in Plymouth who live much closer to the line, the fact is that we obviously would be exposed to some EMF activity. And a speaker at the meeting, a physician, completely refuted Xcel's claim that EMFs have no effects on people. One of us has had significant health issues indicative of a body that is very sensitive to its surrounding environment, and neither of us wants to take any chances with our lives at this point. If the high-voltage line is allowed to be built we've decided we will have no choice but to move. And we'll no doubt have to sell our home, which represents a huge chunk of our life savings, at a very substantial loss. We've heard considerable testimony at these meetings of the many real estate studies documenting such home value losses under similar situations.

There is ample evidence that this new line proposal is a poor and shortsighted one. It is of highly questionable need and will have a severely negative impact on dozens and dozens, if not hundreds, of hapless Plymouth residents.

Jeffrey A Hechsel & Patrick M White

From: wiles3@comcast.net
To: [Steinhauer, Suzanne \(COMM\)](#)
Subject: PUC Docket No. CN-12-113
Date: Thursday, November 15, 2012 10:11:09 PM

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.

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

Sincerely,

Ron and Sheila Wiles
16767 39th Ave N
Plymouth 55446

From: john.wilinski
To: [Steinhauer, Suzanne \(COMM\)](mailto:Steinhauer.Suzanne.COMM)
Cc: monicawilinski@gmail.com
Subject: Certificate of Need
Date: Wednesday, November 14, 2012 7:44:46 AM

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.

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Sincerely,

John and Monica Wilinski
16801 39th Ave. N.
Plymouth, MN 55446