



12300 Elm Creek Blvd • Maple Grove, Minnesota 55369-4718 • 763-445-5000 • Fax 763-445-5050

15 October 2013

David Birkholz
Minnesota Department of Commerce
85 7th Place East, Suite 500
St. Paul, MN 55101

Re: *In the Matter of the Application of Great River Energy for a Route Permit for its 115 kV Transmission Line Project in the Elko New Market and Cleary Lake Areas in Scott and Rice Counties, Minnesota*

MPUC Docket No. ET2/TL-12-1245

Comments: Environmental Assessment Scoping Comments

Dear Mr. Birkholz:

Great River Energy provides these comments for consideration during the Environmental Assessment (EA) scoping period for the combined Certificate of Need and Route Permit application (Application) for the Elko New Market and Cleary Lakes Area Transmission Project, located in Scott and Rice counties, Minnesota (Project). Based on additional analysis of the routes proposed in the Application and on comments received during the scoping period, Great River Energy respectfully requests that the EA include an analysis of an expanded route width for certain areas described below.

Since filing the Application, Great River Energy has continued to evaluate the routes proposed in the Application. Our engineering staff has indicated that additional route width would be needed where we may intersect the new CapX Brookings to Hampton 345 kV line to accommodate design around this 345 kV line in the southern part of the Project. Additionally, Great River Energy has received comments from several landowners in this area through both written comments and comments made at the October 1, 2013 Public Information and Scoping Meetings that expanded route widths should be considered south of the intersection of 250th Street and Texas Avenue. Based on those comments and further evaluation, Great River Energy requests that the EA for this Project include expanded route widths, with proposed alignments, in the following areas (**Figure 1**):

- Any route intersecting the Brookings to Hampton 345 kV Transmission Line (250 foot radius at the intersection - **Figures 2-3**);
- East Option - route south of the intersection of 250th Street and Texas Avenue (additional 250 feet either side, total route width of 800 feet for a length of approximately 2200 feet - **Figure 4**).

Mr. David Birkholz
October 15, 2013
Page 2

While Great River Energy continues to support the routes proposed in its Application for the Project, we believe that these expanded route widths provide options for designing around new infrastructure and for addressing concerns that have been expressed to date by landowners in these areas (providing greater distance between homes and the transmission line while not resulting in additional impacts to human settlement or the environment).

In the area south of the intersection of 250th Street and Texas Avenue (**Figure 4**), Great River Energy requests that the EA include both the expanded route width and the additional alignment within the route width to address concerns raised by landowners during the Public Information and Scoping Meetings regarding farm buildings located on the west side of Texas Avenue.

Great River Energy also requests that should any route alternative be presented in scoping comments that parallels the Brookings to Hampton 345 kV Transmission line, a total route width of 500 feet be used for analysis in the EA.

A copy of this letter and enclosed maps will be mailed concurrently with the filing of this letter on eDockets to the landowners whose property falls within any of the expanded route widths requested for inclusion in the EA.

Please feel free to call me at 763-445-5214 if you have any questions regarding this letter.

Sincerely,

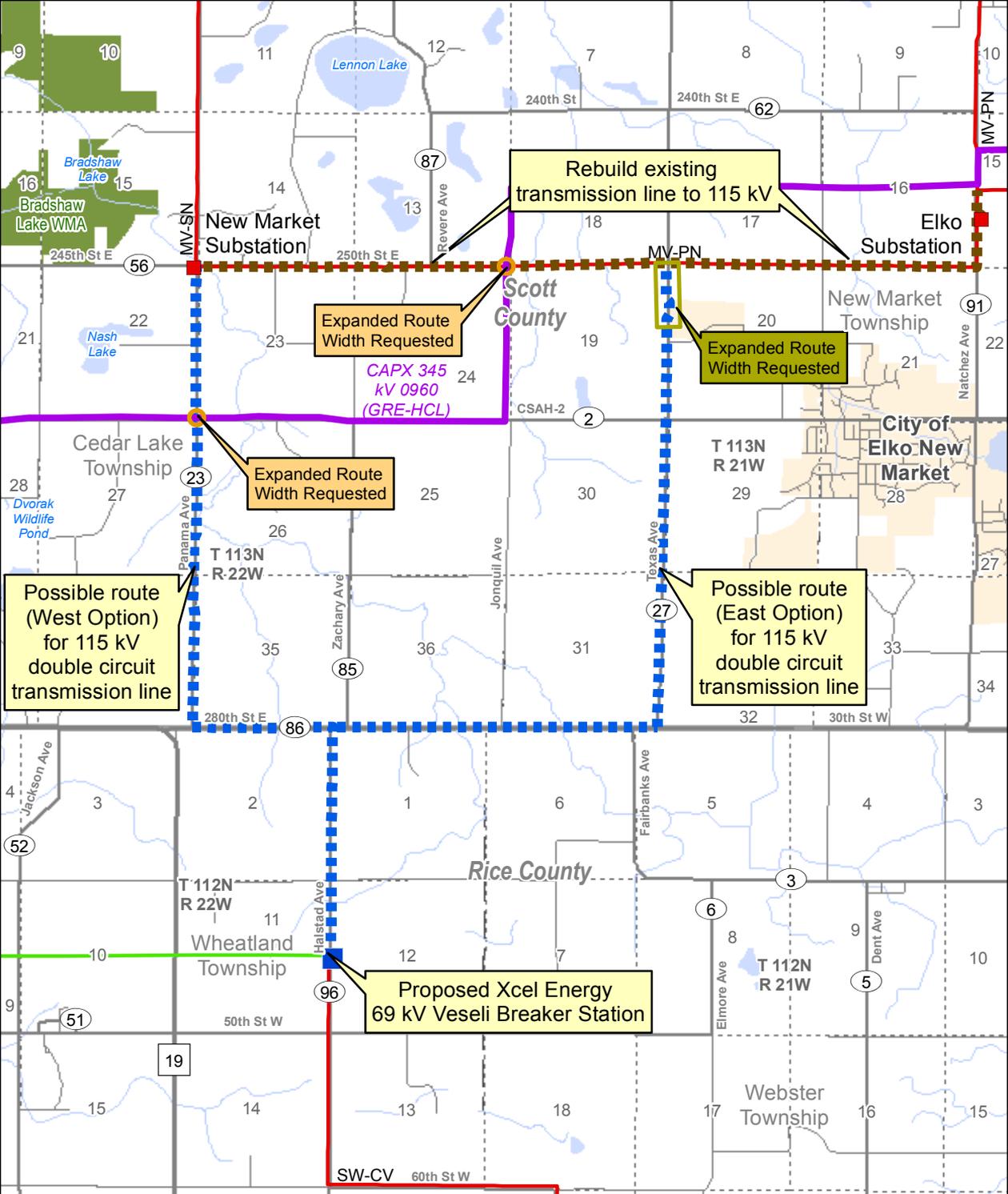
GREAT RIVER ENERGY



Carole L. Schmidt
Supervisor, Transmission Permitting and Compliance

Enclosures

cc: Service List (Docket No. ET2/TL-12-1245)
Landowner List (within requested route width)

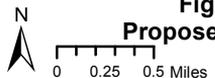


Proposed Great River Energy
 115 kV Transmission Line
 Possible New Route
 Rebuild Route
 Existing Cooperative
 Distribution Substation

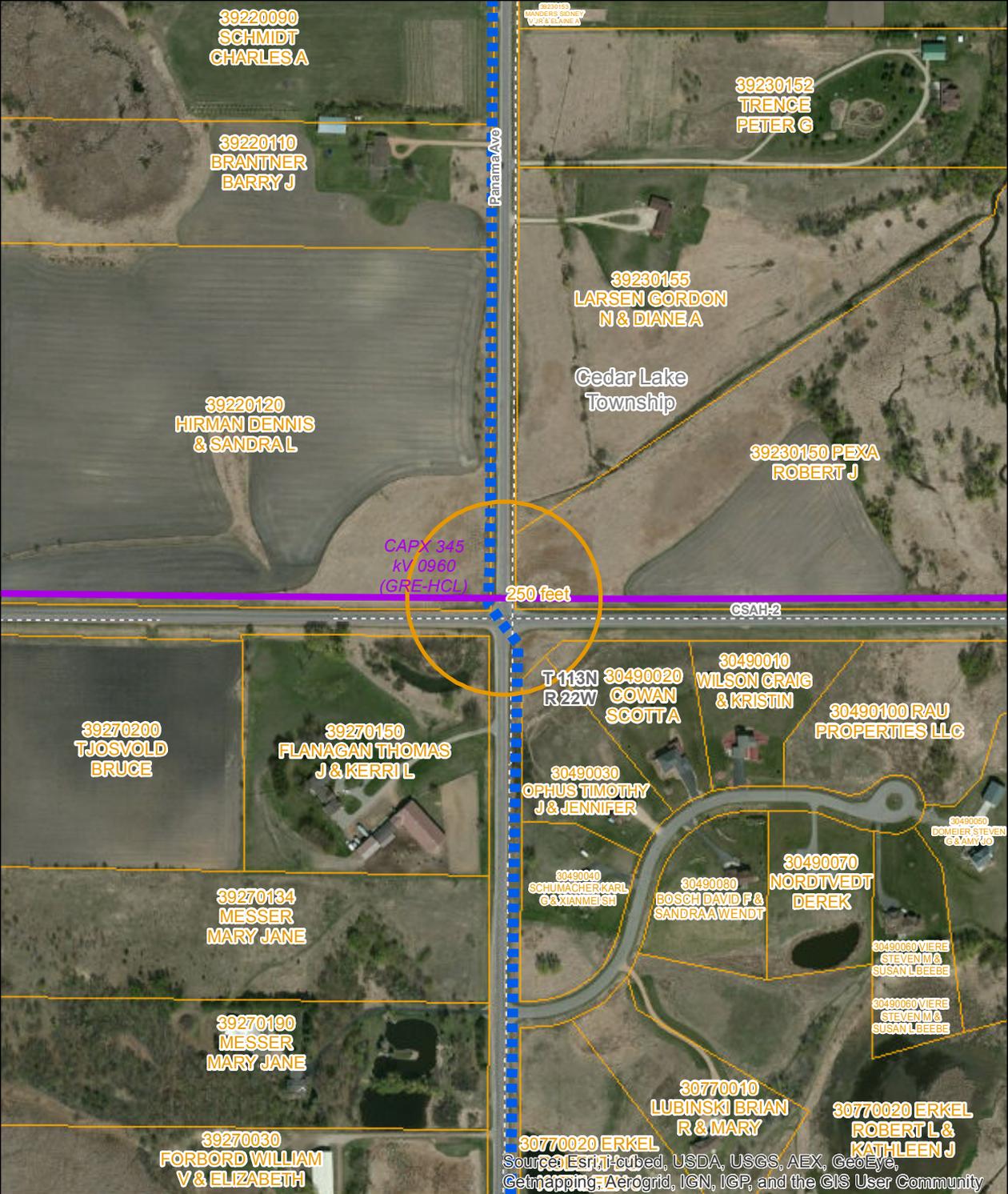
Existing Great River Energy
 69 kV Transmission Line
 Proposed Xcel Energy
 69 kV Breaker Station

Existing Xcel Energy
 69 kV Transmission Line
 Distribution Substation
Additional Corridor Required
 Crossings (250 feet)
 Pinch Point (800' total width)
 CapX Transmission Line

**Elko New Market and
 Cleary Lake Areas Project
 Additional Corridor**
**Figure 1
 Proposed Project**



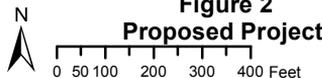
GIS Data sources include: MNGEO, MNDNR, MNDOT, and Great River Energy



Proposed Great River Energy
 115 kV Transmission Line
 ■ Possible New Route
 Additional Corridor Required
 □ Crossings (250 feet)
 — CapX Transmission Line

**Elko New Market and
 Cleary Lake Areas Project
 Additional Corridor**

**Figure 2
 Proposed Project**



GIS Data sources include: MNGEO, MNDNR, MNDOT, and Great River Energy

Sources: Esri, Intel, USDA, USGS, AEX, GeoEye, GeoMapping, AeroGrid, IGN, IGP, and the GIS User Community



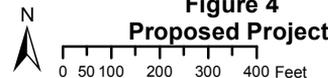
Source: Esri, i-cubed, USDA, USGS, AEX, GeoEye, Getmapping, Aerogrid, IGN, IGP, and the GIS User Community

- | | |
|---|--|
| Proposed Great River Energy
115 kV Transmission Line | Existing Great River Energy
69 kV Transmission Line |
| ■ Possible New Route | ■ Additional Corridor Required |
| ■ Rebuild Route | ■ Pinch Point (800' total width, 1200' length) |

Elko New Market and Cleary Lake Areas Project
Additional Corridor

Figure 4

Proposed Project



GREAT RIVER ENERGY
 A Touchstone Energy Cooperative



AFFIDAVIT OF MAILING

STATE OF MINNESOTA)
) ss.
COUNTY OF HENNEPIN)

RE: Environmental Assessment
 Scoping Comments
 Great River Energy
 Elko New Market and Cleary Lake Areas
 115 kV Project

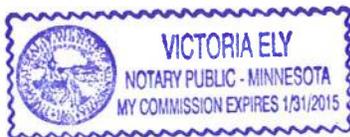
Docket No.: ET-2/TL-12-1245

Cheri J. Finseth, being first duly sworn on oath, deposes and states that on the 15th day of October, 2013, a copy of Great River Energy's Environmental Assessment Scoping Comment Letter (and accompanying figures) for the Elko New Market and Cleary Lake Areas 115 kV Project was mailed via United States first class mail, postage prepaid thereon, to each of the parties on the attached Service List (Landowners within Requested Route Width).

Cheri J. Finseth

SWORN TO BEFORE ME this
15th day of October, 2013.

Victoria Ely
NOTARY PUBLIC



Landowners Within Requested Route Width

VICTORY FIELDS LLC
25235 TEXAS AVE
ELKO, MN 55020

PHILIP A TENNEY LIVING TRUST
6081 250 ST E
ELKO, MN 55020

SCOTT A COWAN
4090 HUNTERS LN
WEBSTER, MN 55088

THOMAS J & KERRI L FLANAGAN
26076 PANAMA AVE
WEBSTER, MN 55088

SCOTT J & LYNETTE M HENRY
25281 TEXAS AVE
ELKO, MN 55020

DENNIS & SANDRA L HIRMAN
1840 DEER POND CIR
EAGAN, MN 55122

GORDON N & DIANE A LARSEN
25795 PANAMA AVE
WEBSTER, MN 55088

GORDON N & DIANE A LARSEN
24245 NATCHEZ AVE
LAKEVILLE, MN 55044

TIMOTHY J & JENNIFER OPHUS
4060 HUNTERS LN
WEBSTER, MN 55088

ROBERT J PEXA
4350 260 ST E
WEBSTER, MN 55088

ROBERT J PEXA
915 270 ST W
NEW PRAGUE, MN 56071

DARIN L WAGNER
25226 TEXAS AVE
ELKO, MN 55020

DARIN L WAGNER
509 DOGWOOD ST NE
LONSDALE, MN 55046

LEON & JUDITH ZWEBER
5775 250 ST E
ELKO, MN 55020

BENJAMIN M & MARY C ZWEBER
6896 250 ST E
ELKO, MN 55020