

Eric Douglas 2-11-14 Rosau  
1st speaker

Notice of Public Information and Environmental Report Scoping Meetings

PUC Docket Number E-015/CN-12-1163

To whom it may concern,

I am opposed to Minnesota Power's Great Northern Transmission Line and question several aspects of this project.

First, while the project was initiated in 2011 with proposed routes included, it was not until mid-September of 2013 that our local "alternate" routes were disclosed and public hearing held. It came as a great surprise that our area is now the primary route. The reasons for this change have not been discussed, making the decision appear arbitrary and not well thought out. This sudden shift is sloppy at best. Why was so much time spent investigating other routes and then at the 11<sup>th</sup> hour shift to a new area?

Second, one of the stated goals is to compliment and "store" wind generated power from the Bison Wind Farm in North Dakota. If that is the case, a more direct approach would be to route straight to the Bison wind farm and use the existing DC line for transmission to the Iron Range which can transport more energy over longer distances with less line loss than AC lines.

A substantial portion of Manitoba Hydro's annual generation can already be exported over the tie to Minnesota with existing lines. In 2003, a line was completed to the United States (the Harvey-Glenboro 230kV line). Manitoba Hydro's largest interconnection is the Dorsey-Forbes-Chisago 500KV (AC) line that begins at the Dorsey substation near Winnipeg and travels south into the United States to the Forbes Substation northwest of Duluth, Minnesota and from there goes south to the Chisago substation located just north of St. Paul, Minnesota. ([http://en.wikipedia.org/wiki/Manitoba\\_Hydro](http://en.wikipedia.org/wiki/Manitoba_Hydro)) Why can't the existing infrastructure be used? This route is already established and already runs to the stated destination.

Manitoba Hydro is also in the process of seeking program approval and route definition for this project, however their timeline is lagging the US timeline considerably. Manitoba Hydro just recently completed the first round of comments on routes and border crossings with a second round to be completed in the Spring of 2014. They anticipate sharing the preferred route in late 2014. This is a full year later than the US schedule. Once Manitoba Hydro has a preferred route, they need to file the project's Environmental Impact Statement for regulatory approval and include input from First Nations, the Manitoba Metis Federation, local municipalities, stakeholder groups, government departments, local land owners, and the general public. ([www.hydro.mb.ca/projects/mb\\_mn\\_transmission/public.shtml](http://www.hydro.mb.ca/projects/mb_mn_transmission/public.shtml)) Finally, Manitoba Hydro plans to file an application with the National Energy Board and submit an Environmental Impact statement to Manitoba Conservation and Water Stewardship in 2015.

([www.hydro.mb.ca/projects/mb\\_mn\\_transmission/environment\\_assessment.shtml](http://www.hydro.mb.ca/projects/mb_mn_transmission/environment_assessment.shtml)) It is premature for Minnesota Power to finalize their route when Manitoba Hydro is just beginning the process.

According to Manitoba Hydro, income from the US sales is used to keep Canadian electric rates low. Wholesale electricity sold to US customers is currently priced 50% higher than what industrial customers in Manitoba pay. ([www.hydro.mb.ca/corporate/electricity\\_exports.shtml](http://www.hydro.mb.ca/corporate/electricity_exports.shtml)) Proceeds from this transmission line agreement will be used to fund expansion of Canadian hydroelectric generating stations and infrastructure improvements. As the U.S. seeks energy independence, I believe we should invest in US based electrical generation and infrastructure improvements, not foreign based sources.

Additionally, Manitoba Hydro views this agreement as "an interim outlet for surplus electricity as the province's usage catches up." ([www.hydro.mb.ca/corporate/electricity\\_exports.shtml](http://www.hydro.mb.ca/corporate/electricity_exports.shtml)) What happens to our needs when that occurs? What happens if there is a drought? Who will be cut off first? The Canadian domestic market or the "surplus" export? The export of electrical energy is regulated in Canada. The National Energy Board licenses exports, based on the criteria that the exports are surplus to domestic need and that the price charged is reasonable and in the Canadian public interest. I believe a better course is to expand our domestic capacity and not be held hostage to availability, weather, or market forces in Canada.

This project is designed not to help our local area, but instead we are simply the conduit. We bear the burden of giving up property and tolerating an eye sore in an otherwise picturesque natural environment. The proposed route cuts across farmland and prime hunting land. It cuts through the Agassiz Lowlands and affects Lost River State Forest, Pine Creek Peat Land Scientific and Natural Area, and Sprague Creek Peat Land Scientific and Natural Area. I chose to live where I do for the very fact that I do not want to raise my family around congested highways, large populations, or monstrous power lines.

Geologically, the proposed route crosses the Agassiz Lowlands Subsection which is characterized by flat poorly drained lake plain, including bog and peat lands. ([www.dnr.state.mn.us/ecs/212Mb/index.html](http://www.dnr.state.mn.us/ecs/212Mb/index.html)) The route borders what is locally known as the "lake bottom" which can viewed on satellite images as a circular area northwest of the city of Roseau. This area captures spring runoff as well as excess rain during the summer months. Water can reach depths of 10 feet or more and persist for several weeks at a time. The proposed route goes directly through areas that flood every spring and careful consideration would be needed prior to any construction that may affect grade or elevation. Soils are predominantly organic. About 75% of the soils are peat in this area. Peat depths can exceed 15 feet so tower construction techniques need to be carefully considered. The risk of fire in peat land is also a concern and would need to be understood. ([www.dnr.state.mn.us/ecs/212Mb/index.html](http://www.dnr.state.mn.us/ecs/212Mb/index.html))

According to "Tomorrow's Habitat for the Wild and Rare: Agassiz Lowlands Subsection Profile" published by Minnesota DNR, the proposed route goes through an area that contains 88 Species in Greatest Conservation Need. These Species in Greatest Conservation Need include 28 species that are federal or state endangered, threatened, or of special concern. One example is the Boreal Chickadee, a Federally protected migratory bird. The study goes on to state that when a Species Problem Analysis was conducted, habitat loss and degradation were the most significant challenges facing Species in Greatest Conservation Need. 90% of these species are vulnerable or in decline because of habitat degradation. A 500kv power line along the proposed route constitutes habitat degradation. Finally, the DNR study

discusses 10 year goals for the area. Goal #1: Stabilize and increase populations of Species in Greatest Conservation Need. The strategy for this is priority Conservation Actions to Maintain, Enhance, and Protect Key Habitats. The proposed route for the Great Northern High Voltage Transmission Line directly contradicts the 10 year plan laid out by Minnesota DNR.

In conclusion, this project not well thought out, as evident with the last minute route changes and lack of consideration for use of existing infrastructure. It is not well coordinated, as can be seen by the Manitoba Hydro project timing discrepancies. It is also a step backwards in energy independence by funding foreign power plant expansion and by subsidizing Canadian customers at the expense of U.S. customers. This project negatively impacts not one, but three environmentally sensitive areas locally and directly conflicts with stated Minnesota DNR goals.

I respectfully submit that this project is not needed at this time. It should be halted and more sensible alternatives considered if a true need is demonstrated in the future.

A handwritten signature in cursive script that reads "Eric Douglas". The signature is written in black ink and is positioned above the printed name.

Eric Douglas

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