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March 14, 2014

Bill Storm
Environmental Review Manager
Minnesota Dept. of Commerce
85 – 7th Place East, Suite 500
St. Paul, MN 55101

via email: bill.storm@state.mn.us

RE: Scoping Comments – Environmental Review
Not-So-Great Northern Transmission Line
PUC Docket E-015/CN-12-1163

Dear Mr. Storm:

I am submitting these comments for Residents and Ratepayers Against Not-so-Great Northern Transmission (RRANT).

Because of the magnitude of this line, so many miles long and such high capacity, an Environmental Impact Statement should be completed, not just an Environmental Report .

The Minnesota Environmental Policy Act, Minn. Stat. ch. 116D, requires an Environmental Impact Statement. There is no provision for an "Environmental Report" as an environmental review document.

Most importantly, the Environmental Report should clearly describe and characterize the "need" for this project, because it is that particularized need that the Alternatives will be measured against.

This project is a transmission line, a small but integral and necessary part of a much larger project in the U.S. and Canada which is currently under NFAT review in Canada. The Environmental Review must consider cumulative impacts of the entire project including the dam and transmission proposed in Canada. But for those, this project would not have been proposed.

The environmental information for the Canadian part of this project should be considered (again,

but for the Canadian part, this project would not be proposed) and incorporated into the environmental review:

- Macro Environmental Considerations – MNP
  - Errata Summary
  - Macro Environmental Considerations UPDATED

The Environmental Report should describe and analyze:

- The purpose of the project, transmission for a small Power Purchase Agreement, and transmission for a much larger amount of export.

- The purpose of the project, weighing its purpose as both a public or private purpose.

- The environmental and policy impacts of building transmission through Minnesota for export.

- The design of this project, specifically the voltage, size of conductor (1192 Bunting?), and number of conductors bundled, and the maximum and projected peak ampacity and MVA.

- The total acreage of Right-of-Way required, and types of land (fields, interior curtilage, shared right-of-way with other infrastructure, lake and river crossings, wetlands, etc.)..

- Alternatives will be analyzed — but what alternatives — alternatives to what? This is a project "needed" to transmit a nominal amount of electricity under a PPA between Minnesota Power and Manitoba Hydro, and the rest is for export. So given that "need" claim, what alternatives are there? This is transmission for profit. Is the search on for another revenue stream for them? Are there alternatives to satisfy this "want" that pretends to be a need? The ER should independently address alternatives to the stated need, that of the 250 MW PPA, and the "need" for export capacity.

- The type of project, as if it is a transmission line for export, it cannot accomplish export if the project's line goes only to the Blackberry substation.

- The timing of this project, as proposed, must be considered, both for purposes of the 250 MW PPA, the potential 133 MW PPA, and for purposes of export, which cannot be accomplished if the project's line goes only to the Blackberry substation.

- Demand side management should be analyzed as an alternative, both within the Minnesota Power system and in Minnesota.

- The inherent inefficiency of transmission over long distances must be quantified and the line loss of the length of transmission from the generation source to the Blackberry substation must be determined.

- The ER should consider reconductoring and/or double circuiting the existing lines from Manitoba to the US.

- The size of this, meaning both the voltage and conductor configuration, should be balanced against the claim of need for this project.

- If the western route connecting into CapX is considered as an alternative, the ability of that alternative to address Minnesota Power's "need" for transmission for its PPA and its agreement to build transmission in associated with that PPA.

- Cultural resources affected by the construction of another dam in Manitoba as a part of this project.

- Cumulative impacts of this transmission project on landowners with other infrastructure, balanced with the state's policy of non-proliferation.

- The full range of potential electric and magnetic fields must be addressed, not just a minimal number that's a small percentage of potential capacity, meaning the fields must be calculated for the 1,024 and 2,000 amps stated on p. 45, and the 4,000-5,000 or more amps of potential conductor ampacity for this conductor configuration.

- The impacts of UV release associated with corona, and the health impacts to humans and animals.

Thank you for the opportunity to submit these Comments.

Very truly yours,

Carol A. Overland
Attorney at Law