

## 3.0 No Action Alternative

Federal National Environmental Policy Act (NEPA) implementing regulations require an analysis of the No Action alternative as a baseline for analyzing and comparing potential environmental impacts from U.S. Department of Energy's (DOE) proposed Federal action.<sup>56</sup>

contingency on the existing 500 kV transmission line to reduce loading and improve performance.<sup>59</sup>

**Under the No Action Alternative, DOE would not issue a Presidential permit and the proposed Project would not be built.** In general, if the proposed Project was not permitted, the environmental impacts associated with the proposed Project as described in Chapter 5 and Chapter 6 of this EIS would not occur. Along with the project-specific environmental impacts related to this proposal, there are other considerations related to the No Action alternative.

If the proposed Project were not constructed, future wind generation could be adversely impacted. According to the Midcontinent Independent System Operator (MISO) Manitoba Hydro Wind Synergy Study<sup>57</sup>, the proposed new 500 kV interconnection with Manitoba would provide "significant benefits" to the entire MISO footprint, including substantial reductions in wind curtailments and better utilization of both wind and hydro resources, meaning increased efficiency of the energy supply system as a whole. Over a 20-year time frame, these benefits were valued at approximately \$1.6 billion in 2012 dollars for the northern MISO region.<sup>58</sup>

In addition, if the proposed Project were not constructed, the Applicant would not take delivery from Manitoba Hydro under the MN PUC-approved 250 MW power purchase agreement and the 133 MW Renewable Optimization Agreements. According to the MN PUC findings in its certificate of need proceeding, the Applicant's current facilities are not likely to be sufficient to meet future electrical demand on its system. Therefore, if the proposed Project were not constructed, the Applicant would have to implement one or more other options to meet future demand. Also, the proposed Project would not be available during a

<sup>56</sup> 40 Code of Federal Regulations (CFR) 1502.14(d).

<sup>57</sup> Available at: [https://www.google.com/url?sa=t&rct=j&q=&esrc=s&frm=1&source=web&cd=1&ved=0CB4QFjAAahUKewj\\_h5XtIMPIAhULxoAKHeAHDhM&url=https%3A%2F%2Fwww.misoenergy.org%2Flayouts%2FMISO%2FECM%2FDownload.aspx%3FID%3D160821&usq=AFQjCNGZxZvRrDELHEJKJ1nnNoKh\\_hWTRA&sig2=U83nVSqD5Xe9rC7\\_n2qJQw](https://www.google.com/url?sa=t&rct=j&q=&esrc=s&frm=1&source=web&cd=1&ved=0CB4QFjAAahUKewj_h5XtIMPIAhULxoAKHeAHDhM&url=https%3A%2F%2Fwww.misoenergy.org%2Flayouts%2FMISO%2FECM%2FDownload.aspx%3FID%3D160821&usq=AFQjCNGZxZvRrDELHEJKJ1nnNoKh_hWTRA&sig2=U83nVSqD5Xe9rC7_n2qJQw).

<sup>58</sup> Ex. 19 in CN docket, Hoberg Direct, (Midcontinent Independent System Operator (MISO) Hydro Wind Synergy Study).

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