

# **APPENDIX A**

## **Early Outreach to Stakeholders**

Postcard Invitation to Open House

Example Local Governmental Unit Example Letter

Example Landowner Letter Identifying East Route Option

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# Public Information Open House

## Motley 115 kV transmission line project

4 – 7 p.m.

Tuesday, September 23, 2014

Motley United Methodist Church

847 3rd Avenue South

Motley, Minnesota

***No formal presentation is planned – come  
anytime during the hours indicated above***

Great River Energy and Crow Wing Power will host an open house meeting to collect public input on the proposed construction of a 14-mile-long 115 kilovolt transmission line located in the Motley area (see map at right).

If you have any questions regarding this proposed project, please contact:

Rick Heuring

Great River Energy

763-445-5979

1-888-521-0130, ext. 763-445-5979

A project fact sheet and updates can be  
found at [greatriverenergy.com/motley](http://greatriverenergy.com/motley)



**Back of Postcard  
(6 inches x 8 inches)**





12300 Elm Creek Blvd • Maple Grove, Minnesota 55369-4718 • 763-445-5000 • Fax 763-445-5050 • [www.GreatRiverEnergy.com](http://www.GreatRiverEnergy.com)

September 9, 2014

Motley Area 115 kV  
WO #202972

<LGU ADDRESS>

SUBJECT: Proposed Motley Area 115 kV Transmission Project

You are receiving this letter and the enclosed project fact sheet because you are an elected official or a government agency representative who may want to know more about a proposed 115 kilovolt electric transmission project in the Motley area. Great River Energy and Crow Wing Power will host a project information open house from 4:00 p.m. to 7:00 p.m. on Tuesday, September 23<sup>rd</sup> at the Motley United Methodist Church, 847 3<sup>rd</sup> Avenue South, Motley, MN. Meeting notifications will be mailed to all property owners located within 500 feet of the project area. There will also be public meeting notices published in three Motley-area newspapers around September 13<sup>th</sup>.

*If you are an agency such as the Corps of Engineers or the DNR, this notice is of a general nature and you may or may not have an interest in this project. Our environmental department will be contacting you with details of the project and if permits are needed from your agency a formal application will be submitted.*

This project requires approval by the Minnesota Public Utilities Commission (PUC). The permitting process will begin early in 2015 and affected property owners and other interested parties will be notified by State Department of Commerce or PUC staff and are encouraged to participate in the permitting process.

If you have any questions regarding the project or the open house meeting, please contact me directly by phone or email, or visit our project website at [greatriverenergy.com/motley](http://greatriverenergy.com/motley).

Sincerely,  
GREAT RIVER ENERGY

Rick Heuring  
Sr. Field Representative

Enclosure

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12900 Elm Creek Blvd • Maple Grove, Minnesota 55369-4718 • 763-445-5000 • Fax 763-445-5050 • [www.GreatRiverEnergy.com](http://www.GreatRiverEnergy.com)

November 12, 2014

Motley Area 115 kV Project  
WO #202972

<LANDOWNER ADDRESS>

SUBJECT: Motley Area 115 kV Transmission Project Update  
PUC Docket No. ET2, E015/CN-14-853

Dear <LANDOWNER>:

You are receiving this letter along with a project fact sheet because you may reside at or own property (based on public tax records) in proximity of a proposed 115 kV transmission line project in the Motley area. Great River Energy and Crow Wing Power (CWP) hosted an early project open house on September 23, 2014, at the Motley United Methodist Church in Motley, MN. Approximately 20 interested citizens attended that meeting. Since that time, Great River Energy has continued to receive feedback from other interested citizens who did not attend the open house meeting.

Following the September meeting, we have continued our efforts in evaluating other viable route options for this project, and have identified a second route option for the eastern segment of this important project. Please refer to the enclosed fact sheet map that depicts two proposed route alternatives (identified as the west and east options), both extending from the Minnesota Power "24" Line to CWP's Motley Substation. While the east route option is approximately one mile longer, and thus more expensive, the new transmission line could jointly share Minnesota Power's existing 34.5 kV power line crossing over the Crow Wing River in proximity of 380<sup>th</sup> Street and Red River Trail. Conversely, the west route option would necessitate an entirely new crossing over the river. Fewer power line crossings over a river can minimize potential impacts to birds that use the river for navigation and feeding.

Before the project can be constructed, the project requires approval by the Minnesota Public Utilities Commission (PUC). Early in 2015, Great River Energy will submit both the west and east route alternatives in our application to the PUC, which will begin an approximate one-year-long state permitting process. You and other interested parties will be notified by Minnesota Department of Commerce or PUC staff of details of public meetings and how to participate in the State's permitting process. We encourage you to stay engaged in the process, as public input is an important factor in how the PUC considers and ultimately approves a single route for the project.

Direct Dial (763) 445-5979

E-Mail [rheuring@greenergy.com](mailto:rheuring@greenergy.com)

FAX (763) 445-6779

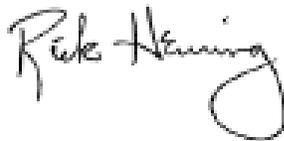
November 12, 2014

Page 2

If you have any questions or would like additional information regarding this project, please contact me by phone or email, or visit our project website at [greatriverenergy.com/motley](http://greatriverenergy.com/motley). Because the east route option was not identified prior to the September open house meeting, we would be happy to meet with you and discuss the project and the state review process in further detail.

Sincerely,

**GREAT RIVER ENERGY**

A handwritten signature in black ink that reads "Rick Heuring". The signature is written in a cursive style with a large, looping "H" and "G".

**Rick Heuring**  
Sr. Field Representative

Enclosure

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Direct Dial (763) 443-3979

E-Mail [rheuring@greenergy.com](mailto:rheuring@greenergy.com)

FAX (763) 443-6779

# **APPENDIX B**

## Exemption and Notice Plan Approval Order

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BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger  
David C. Boyd  
Nancy Lange  
Dan Lipschultz  
Betsy Wergin

Chair  
Commissioner  
Commissioner  
Commissioner  
Commissioner

In the Matter of the Application of Great River Energy and Minnesota Power for a Certificate of Need for the Motley Area 115 kV Transmission Line Project in Morrison, Cass, and Todd Counties

ISSUE DATE: January 30, 2015

DOCKET NO. ET-2, E-015/CN-14-853

ORDER APPROVING NOTICE PLAN,  
APPROVING EXEMPTION REQUEST,  
AND GRANTING VARIANCES

**PROCEDURAL HISTORY**

On October 1, 2014, Great River Energy and Minnesota Power (the Applicants) filed a notice plan petition for their proposed 115 kV transmission line project in Morrison, Cass, and Todd Counties (the project). On October 17, 2014, Applicants filed supplemental information in support of their request for a variance to Minn. R. 7829.2500, subp. 5, Publication in Newspapers.

On October 21, 2014, the Minnesota Department of Commerce, Division of Energy Environmental Review and Analysis (EERA) filed comments and proposed certain minor modifications to the notice plan to 1) complete and correct notices that will be distributed via the plan, and 2) expand the distribution of notices to governmental entities.

Also on October 21, 2014, the Minnesota Department of Commerce, Division of Energy Resources (the Department), filed comments recommending that the Commission approve the Applicants' notice plan with the modifications recommended by the EERA. The Department also recommended that the Commission grant a variance to the rule requiring that a notice plan be implemented within 30 days of Commission approval. Finally, the Department recommended that the Commission accept the Applicants' request for a variance of the rule requiring additional newspaper notification of the certificate of need application upon filing of the application.

On October 30, 2014, Applicants filed a request for exemption from certain data requirements under Minn. R. 7849.0200, subp. 6, in connection with an anticipated certificate of need application.<sup>1</sup>

On November 3, 2014, the Commission issued a notice soliciting comments on Applicants' exemption request.

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<sup>1</sup> Applicants intend to file a combined certificate of need and route permit application for their proposed project.

On November 10, 2014, Applicants filed reply comments in response to the EERA's and the Department's comments.

On November 14, 2014, the Department filed comments on Applicants' exemption requests. The Department recommended that the Commission approve the requests for exemption from the required data conditioned upon the provision of certain proposed alternative data.

On January 22, 2015, the Commission met to consider the matter.

## FINDINGS AND CONCLUSIONS

### **I. Proposed Project**

Applicants have proposed to construct an approximately 14-mile 115 kV transmission line in the Motley Area in Morrison, Cass, and Todd counties, and to construct and modify certain substations. The project entails: 1) construction of approximately 14 miles of north-south single circuit 115 kV line; 2) construction of a breaker station and approximately one-half mile of 115 kV transmission line at Minnesota Power's Dog Lake substation; 3) conversion of the existing Crow Wing Power Motley substation from 34.5 kV to 115 kV; and 4) construction of a proposed Crow Wing Power Fish Trap Lake Superior substation on Minnesota Pipeline Company's pumping station property near US Highway 10 and Holt Road.

### **II. Proposed Notice Plan**

The EERA and the Department coordinated their review of the Applicants' notice plan.

The agencies reviewed the Applicants' notice plan under Minn. R. 7829.2550, subp. 3, which requires an applicant to file a proposed notice plan designed to notify all persons reasonably likely to be affected by the proposed line. The rule requires such plans to include direct mail notice to landowners, tribal governments, local governments, and other governmental entities, as well as to all mailing addresses within the area reasonably likely to be affected by the line. The rule also requires newspaper notice to members of the public in areas reasonably likely to be affected by the proposed line. The notice must contain information regarding the project, including a map of the proposed line and other existing facilities, as well as a statement that the line cannot be constructed unless the Commission certifies that it is needed.

The EERA reviewed the proposed notice plan and found that, in general, the plan is consistent with the requirements of Minn. R. 7829.2550. The EERA recommended certain modifications to the notice plan to 1) complete and correct notices that will be distributed under the plan, and 2) expand the distribution of notices to governmental entities.<sup>2</sup>

The Department agreed with the EERA's proposed modifications to the notice plan. With those modifications, the Department recommended its approval.

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<sup>2</sup> The EERA's recommended revisions to the notice plan are located in Attachment 1 ("EERA Edits to Notice Content") to the EERA's October 21, 2014 comments in this docket.

In their November 10, 2014 comments, the Applicants agreed to make the changes recommended by the EERA. Applicants also provided an additional viable route option and modified the example letter accordingly.<sup>3</sup>

Having considered the Applicants' proposed notice plan, the Commission concurs with the EERA and the Department that the plan meets the requirements contained in Minn. R. 7829.2550, with the modifications recommended by the EERA and the additional route option identified by the Applicants in their reply comments. Accordingly, the Commission approves the notice plan with these modifications.

Finally, the Commission will require that the proposed notice letter include Hwikwon Ham, Energy Facilities Planner, as the Commission contact.<sup>4</sup>

### III. Rule Variances

The Applicants requested that the Commission grant variances to Minn. R. 7829.2500, subp. 5 and Minn. R. 7829.2550, subp. 6.

#### A. Minn. R. 7829.2550, subp. 6

Minn. R. 7829.2550, subp. 6 requires the applicant to implement the proposed notice plan within 30 days of approval by the Commission. Applicants requested that the Commission direct the notices identified in this notice plan to occur no more than 60 days prior to the filing of the certificate of need application to allow the notice to more closely coincide with the certificate of need filing.

The Department noted that the Commission has ordered a similar approach in other certificate of need dockets, and recommended that the Commission approve the request and grant a variance to Minn. R. 7829.2550, subp. 6 to allow implementation of the notice plan no more than 60 days prior to the filing of the certificate of need application.

#### B. Minn. R. 7829.2500, subp. 5

Applicants also requested that the Commission vary Minn. R. 7829.2500, subp. 5, which requires a person filing a certificate of need application to publish notice of the filing in newspapers of general circulation throughout the state at the time the certificate of need application is filed. Applicants stated that they will publish newspaper notice of the certificate of need filing as part of the notice plan implementation no more than 60 days before a joint need/route application is filed in newspapers of local, regional, and statewide circulation.

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<sup>3</sup> The additional route option interconnects with the Minnesota Power "24" Line approximately one and one-half miles southeast of the previously proposed interconnection. Applicants indicated they will send a voluntary project notification so indicating to new landowners along the new option and a project update to all stakeholders.

<sup>4</sup> Hwikwon Ham, Senior Energy Facilities Planner, Minnesota Public Utilities Commission, 121 7<sup>th</sup> Place East, Suite 350, St. Paul, Minnesota 55101-2147, (651) 201-2253, by fax at (651) 297-7073 and by e-mail at [hwikwon.ham@state.mn.us](mailto:hwikwon.ham@state.mn.us).

In comments filed October 21, 2014, the Department agreed that in this case, since the certificate of need and route permit applications will be filed simultaneously, a single notice informing the public of both applications could fulfill both rule requirements. The Department recommended that the Commission grant the Applicants' request for a variance to Minn. R. 7829.2500, subp. 5 to eliminate the need for potentially redundant newspaper notification of the certificate of need application upon its filing.

### C. Commission Action

Under Minn. R. 7829.3200, the Commission is authorized to vary any of its rules upon making the following findings:

- 1) enforcing the rule would impose an excessive burden upon the applicant or others affected by the rule;
- 2) granting the variance would not adversely affect the public interest; and
- 3) granting the variance would not conflict with standards imposed by law.

The Commission concurs with the parties and will vary the 30-day timeline of Minn. R. 7829.2550, subp. 6. The Commission will also vary the requirement of Minn. R. 7829.2500, subp. 5 that an applicant publish a separate newspaper notice upon the filing of a certificate of need application, instead authorizing the newspaper notices for the certificate of need and the route permit application to be combined. In granting these variances, the Commission makes the following findings:

- 1) Enforcing the rules would impose an excessive burden upon the public and upon parties to the proceeding by separating the delivery of the notice from the start of the certificate of need proceeding;
- 2) Granting the variances would not adversely affect the public interest and would in fact serve the public interest since implementation of the notice would more closely coincide with the beginning of the certificate of need process; and
- 3) Varying the 30-day timeline would not conflict with any other standards imposed by law.

## IV. Exemption Requests

### A. In General

Commission rules list the types of information that might be useful for evaluating the need for a large energy facility, and direct utilities to file this information with their certificate of need applications. But not every type of information listed is relevant or appropriate to every type of large energy facility. Consequently, the rules provide for applicants to seek exemptions from these rules whenever the data requirement is unnecessary to determine the need for the proposed facility.<sup>5</sup> In this manner, the certificate of need filing requirements are tailored to the circumstances of each proposal.

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<sup>5</sup> Minn. R. 7849.0200, subp. 6.

## **B. Applicants' Request**

Applicants requested exemption from providing data requested under the following portions of Minnesota Rules:

- Minn. R. 7849.0260, subps. A(3) and C(6), Line Losses.
- Minn. R. 7849.0270, subps. 1 and 2, System-Wide Data.
- Minn. R. 7849.0270, subps. 2(B) and 2(C), Customer Class Information.
- Minn. R. 7849.0270, subp. 2(C), Annual Peak Demand.
- Minn. R. 7849.0270, subp. 2(D), Monthly Peak Demand.
- Minn. R. 7849.0270, subp. 2(E), Revenue Requirements.
- Minn. R. 7849.0270, subp. 2(F), Weekday Load Factor.
- Minn. R. 7849.0270, subps. 3-5, Forecast Methodology.
- Minn. R. 7849.0280 (A) and (H), System Capacity.
- Minn. R. 7849.0280 (B) through (I), System Capacity.
- Minn. R. 7849.0290, Conservation.
- Minn. R. 7849.0300, Consequences of Delay, 7849.0340, Alternative of No Facility.

Applicants stated that in accordance with Minn. R. 7849.0200, subp. 6, the Commission could grant an exemption from providing certain information as part of a certificate of need application if the applicant requested an exemption in writing that showed that the data requirement was either unnecessary to determine the need for the proposed facility or that the requirement could be satisfied by submitting another document. With respect to each rule from which they seek exemption, Applicants have undertaken to make such a showing.<sup>6</sup>

## **C. The Department's Comments and Recommendations**

The Department submitted a detailed analysis of each of the Applicants' exemption requests on November 14, 2014. The Department concluded that the Commission should grant the requested exemptions upon the provision of the proposed alternative data.

## **D. Commission Action**

Minn. R. 7849.0200, subp. 6 states:

Before submitting an application, a person is exempted from any data requirement [of this chapter] if the person (1) requests an exemption from specified rules, in writing to the commission, and (2) shows that the data requirement is unnecessary to determine the need for the proposed facility or may be satisfied by submitting another document.

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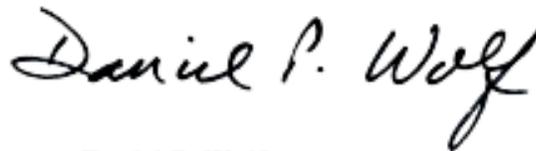
<sup>6</sup> The Applicants' proposed alternative data is set forth in their October 30, 2014 comments and summarized in Attachment A hereto.

The Commission has reviewed the Department's detailed examination of Applicants' exemption requests, and concurs in its analysis and grants the requests, conditioned upon the provision of the proposed alternative data.

### ORDER

1. The Commission approves the proposed notice plan as modified by the Applicants in their reply comments, and with the addition of the Commission contact information listed in footnote 4 herein.
2. The Commission varies Minn. R. 7829.2500, subp. 5, and permits Applicants to combine publishing the newspaper notices for the certificate of need and the route permit upon filing a joint application.
3. The Commission varies Minn. R. 7829.2550, subp. 6, and authorizes Applicants to implement the notice plan no more than 60 days prior to the filing of the certificate of need application.
4. The Commission grants the Applicants' exemption requests from Minn. R. 7849 as set forth herein and as reflected in Attachment A hereto, subject to Applicants providing the alternative data as specified.
5. This order shall become effective immediately.

BY ORDER OF THE COMMISSION



Daniel P. Wolf  
Executive Secretary



This document can be made available in alternative formats (e.g., large print or audio) by calling 651.296.0406 (voice). Persons with hearing loss or speech disabilities may call us through their preferred Telecommunications Relay Service.

## Applicants' Exemption Request

Minnesota Rule	Scope of Exemption
Minnesota Rule 7849.0260, Subps. A(3) and C(6), Line Losses.	Request to provide overall system loss data in lieu of line loss data.
Minnesota Rule 7849.0270, Subps. 1 and 2, System-Wide Data.	Request to provide data for the affected load area for Subps. 1 and 2.
Minnesota Rule 7849.0270, Subps. 2(B) and 2(C), Customer Class Information.	Request to provide customer class information only as it relates to the proposed MPL pumping station.
Minnesota Rule 7849.0270, Subp. 2(C), Annual Peak Demand.	Request to provide data for the affected load area on an annual coincident peak basis.
Minnesota Rule 7849.0270, Subp. 2(D), Monthly Peak Demand.	Request to provide Minnesota Power substation and Great River Energy member cooperative substation demand data within the affected load area.
Minnesota Rule 7849.0270, Subp. 2(E), Revenue Requirements.	Request to provide a description of the general financial effect of the Project on Great River Energy member cooperatives and on Minnesota Power.
Minnesota Rule 7849.0270, Subp. 2(F), Weekday Load Factor.	Full exemption requested.
Minnesota Rule 7849.0270, Subps. 3-5, Forecast Methodology.	Request to provide forecast methodology for affected load area substations as reflected in the requests for certain exemptions from Minnesota Rule 7849.0270, Subpart 2.
Minnesota Rule 7849.0280(A) and (H), System Capacity.	Request to provide data for (A) and (H) for the affected load area.
Minnesota Rule 7849.0280(B) through (I), System Capacity.	Full exemption requested.
Minnesota Rule 7849.0290, Conservation.	Request to provide data on Minnesota Power programs and programs that Great River Energy makes available to member cooperatives serving the affected load area.
Minnesota Rules 7849.0300, Consequences of Delay, 7849.0340, Alternative of No Facility.	Exemption requested from requirement to provide analysis using three confidence levels. Request to provide data regarding potential impacts caused by delay and no build alternative on community service reliability in the affected load area.

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# **APPENDIX C**

## **Certificate of Need Application Requirements Completeness Checklist**

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### Certificate of Need Application Completeness Checklist

Authority	Required Information	Location in Application
Minn. R. 7849.0120 A	Showing that denial would adversely affect adequacy, reliability and efficiency	
1	Demand forecast for type of energy supplied by proposed facility is accurate	§ 5.6
2	Effects of Applicants' conservation program and state and federal conservation programs	§ 5.8; Appendix H
3	Effects of Applicants' promotional practices on energy demand	§ 5.10
4	Ability of current facilities and facilities not requiring CON to meet future demand	§§ 5.1; 6.4.1
5	Effect of proposed facility in making efficient use of resources	§§ 4.1; 5.7
Minn. R. 7849.0120 B	A more reasonable and prudent alternative has not been demonstrated	
1	Facility is appropriate size, type and timing compared to reasonable alternatives	§ 4.1; Chapter 6
2	Cost of facility and of its energy compared to reasonable alternatives	§ 4.2; Chapter 6
3	Effects of the proposed facility upon the natural and socio-economic environment compared to the effects of reasonable alternatives	Chapters 6 and 9
4	Expected reliability of facility compared to reasonable alternatives	§ 4.1; Chapter 6
Minn. R. 7849.0120 C	Project will provide benefit to society:	
1	Relationship of facility to overall state energy needs	§ 5.2
2	Effects of facility on natural and socio-economic environment compared to not building facility	§ 6.10; Chapter 9
3	Effects of facility inducing future development	§§ 5.1; 8.1.2
4	Socially beneficial uses of the output of the facility, including its uses to protect or enhance environmental quality	§ 5.1; Chapter 9
Minn. R. 7849.0120 D	Project will comply with relevant policies and regulations of other state and federal agencies and local governments	§§ 2.5; 4.6; 8.4; Chapter 9
Minn. R. 7849.0200, Subp. 2	Title Page	Title Page
Minn. R. 7849.0200, Subp. 2	Table of Contents	Pages i – viii

Authority	Required Information	Location in Application
Minn. R. 7849.0200, Subp. 4	Cover Letter	Cover Letter
7849.0210	Filing Fee	Cover Letter
Minn. R. 7849.0220, Subp. 3	Joint Ownership and Multiparty Use	§ 3.1
Minn. R. 7849.0230	Draft Environmental Report	Not required
Minn. R. 7849.0240	Need Summary and Additional Considerations	
Minn. R. 7849.0240, Subp. 1	Major factors that justify need for facility	5.1
Minn. R. 7849.0240, Subp. 2(A)	Socially beneficial uses of facility output, including uses to protect or enhance environmental quality	§ 5.1; Chapter 9
Minn. R. 7849.0240, Subp. 2(B)	Promotional activities that may have given rise to demand	§ 5.10
Minn. R. 7849.0240, Subp. 2(C)	Effects of the facility in inducing future development	§§ 5.1; 8.1.2
Minn. R. 7849.0260	Proposed LHVTL and Alternatives	
Minn. R. 7849.0260 A	Type and location of proposed line, including:	
1	Design voltage	§ 4.1
2	Number, sizes and types of conductors	§ 4.1
3	Expected losses under maximum and average loading in lines and terminals or substations <i>Exemption: Provide total system losses.</i>	§ 4.5
4	Length of line and portion in Minnesota	§ 4.1
5	Location of DC terminals or AC substations on map	§ 4.1; Figures 1-3 and 1-4; Appendix F
6	List of counties affected by construction and operation	§ 4.1

Authority	Required Information	Location in Application
Minn. R. 7849.0260 B	Availability of alternatives, including:	
1	New generation of various technologies, sizes, fuel types	§ 6.2
2	Upgrade of existing lines or generating facilities	§ 6.3
3	Transmission with different voltages or conductor arrays	§§ 6.4; 6.5
4	Transmission lines with different terminals or substations	§ 6.6
5	Double circuiting of existing transmission lines	§ 6.7
6	If facility for DC (AC) transmission, an AC (DC) transmission line	§ 6.8
7	If facility for overhead (underground) transmission, an underground (overhead) transmission line	§ 6.9
8	Any reasonable combination of alternatives (1) – (7)	Chapter 6
Minn. R. 7849.0260 C	For facility and for each alternative, discuss:	
1	Total cost in current dollars	§ 4.2; Chapter 6
2	Service life	§ 4.1.1; Chapter 6
3	Estimated average annual availability	§ 4.1.1; Chapter 6
4	Estimated annual operating and maintenance costs in current dollars	§§ 4.2.2; 8.6; Chapter 6
5	Estimate of its effect on rates system-wide and in Minnesota	§ 4.3
6	Efficiency Exemption: <i>Provide system totals.</i>	§§ 4.5; 5.7; Chapter 6
7	Major assumptions made in sub items (1) – (6)	See above
Minn. R. 7849.0260 D	Scaled map showing the system or load center to be served	Figures 1-3; 1-4; 3-1
Minn. R. 7849.0260 E	Any other relevant information about the proposed facility and each alternative	Seriatim
Minn. R. 7849.0270	Content of Forecast	
Minn. R. 7849.0270, Subp. 1	Pertinent data concerning peak demand and annual electrical consumption Exemption: <i>Provide cooperative-owned and non-cooperative-owned substation data.</i>	§ 5.5
Minn. R. 7849.0270, Subp. 2	Forecast data Exemption: <i>Provide cooperative-owned and non-cooperative-owned substation data.</i>	§ 5.6
Minn. R. 7849.0270, Subp. 3	Detail of the forecast methodology employed in Subp.2 Exemption: <i>Provide cooperative and non-cooperative load.</i>	§ 5.6.1

Authority	Required Information	Location in Application
Minn. R. 7849.0270, Subp. 4	Discussion of the data base used in current forecasting Exemption: <i>Provide cooperative and non-cooperative load.</i>	§ 5.6
Minn. R. 7849.0270, Subp. 5	Discussion of assumptions made in forecast preparation Exemption: <i>Provide cooperative and non-cooperative load.</i>	§ 5.6
Minn. R. 7849.0270, Subp. 6	Coordination of forecasts	§ 5.6
Minn. R. 7849.0280	Description of system capacity Exemption: <i>Provide cooperative and non-cooperative load.</i>	§ 5.6
Minn. R. 7849.0290	Conservation Programs	§ 5.8; Appendix H
Minn. R. 7849.0300	Consequences of delay Exemption: <i>Threshold peak demand.</i>	§ 5.9
Minn. R. 7849.0310	Environmental Information	Chapter 9; Appendix F; Appendix J
Minn. R. 7849.0330	Provide data for each alternative that would require LHVTL construction	§ 4.1.1; Chapter 6; Chapter 8; Chapter 9
Minn. R. 7849.0340	No-Facility Alternative Exemption: <i>Threshold peak demand.</i>	§§ 5.9; 6.10
Minn. R. 7849.0340 C	Description of possible methods of reducing environmental impact	Chapter 9
Minn. R. 7829.2500, Subp. 2	Single Page Summary for Interested Parties	Filing Summary

# **APPENDIX D**

## **Notice of Intent to File Under Alternate Permitting Process**

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12300 Elm Creek Blvd • Maple Grove, Minnesota 55389-4718 • 763-445-5000 • Fax 763-445-5050

March 5, 2015

Mr. Daniel P. Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101

eFiled March 5, 2015

**RE: Notice of Intent by Great River Energy and Minnesota Power to Submit a Route Permit Application under the Alternative Permitting Process  
Motley Area 115 kV Project, ET2, E015/TL-15-204**

Dear Mr. Wolf:

On behalf of Great River Energy and Minnesota Power (Applicants), pursuant to Minn. Rules 7850.2800, subp. 2, Great River Energy submits this notice to the Minnesota Public Utilities Commission (Commission) that Applicants intend to submit a Route Permit application for the Motley Area 115 kV Project in Morrison, Cass and Todd counties, Minnesota under the Alternative Permitting processes of Minn. Rules 7850.2800 to 7850.3900.

Applicants intend to submit a combined Certificate of Need/Route Permit application to the Commission in March 2015. The Commission has assigned Docket No. ET2, E015/CN-14-853 to the Certificate of Need proceeding.

Please feel free to call me at 763-445-5210 if you have any questions regarding this notice.

Sincerely,

GREAT RIVER ENERGY

Mark Strohfus  
Environmental Project Lead

c: Deborah Pile, EERA

S:\Transmission\Capital Projects\202987 - Motley Area 115 kV Project\202972 - Fish Trap Pumping Station 115 kV Line (20 mi)\LR-ENV\Environmental\Cert of Need\Alternative Process Notification 03-05-15.docx

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# **APPENDIX E**

## **Route Permit Application Requirements Completeness Checklist**

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## Route Permit Application – Alternative Process Completeness Checklist

Authority	Required Information	Location in Application
Minn. Stat. § 216E.04, subd. 2(3)	<b>Alternative Review of Applications.</b> Alternative review is available for high voltage transmission lines of between 100 and 200 kV	§ 2.2
Minn. Stat. § 216E.04, subd. 4; Minn. R. 7850.2800, Subp. 1(C)	Subpart 1. <b>Eligible Projects.</b> An applicant for a site permit or a route permit for one of the following projects may elect to follow the procedures of parts 7850.2800 to 7850.3900 instead of the full permitting procedures in parts 7850.1700 to 7850.2700: <b>high voltage transmission lines of between 100 and 200 kilovolts</b>	Appendix D
Minn. R. 7850.2800, Subp. 2.	Subpart 2. <b>Notice to PUC.</b> An applicant for a permit for one of the qualifying projects in subpart 1, who intends to follow the procedures of parts 7850.2800 to 7850.3700, shall notify the PUC of such intent, in writing, at least ten days before submitting an application for the project	Appendix D
Minn. R. 7850.3100	<b>Contents of Application</b> (alternative permitting process) The applicant shall include in the application the same information required in part 7850.1900, except the applicant need not propose any alternative sites or routes to the preferred site or route. If the applicant has rejected alternative sites or routes, the applicant shall include in the application the identity of the rejected sites or routes and an explanation of the reasons for rejecting them	This document.
Minn. R. 7850.1900, Subp. 2 (applicable per Minn. R. 7850.3100)	<b>Route Permit for HVTL</b> A. a statement of proposed ownership of the facility at the time of filing the application and after commercial operation	§ 3.1
	B. the precise name of any person or organization to be initially named as permittee or permittees and the name of any other person to whom the permit may be transferred if transfer of the permit is contemplated	§ 3.1
	C. rejected alternative routes and the reasons for rejecting	§ 7.2
	D. a description of the proposed high voltage transmission line and all associated facilities including the size and type of the high voltage transmission line	§ 4.1
	E. the environmental information required under 7850.1900, Subp. 3	Chapter 9
	F. identification of land uses and environmental conditions along the proposed routes	§§ 9.1; 9.8
	G. the names of each owner whose property is within any of the proposed routes for the high voltage transmission line	Appendix H

Authority	Required Information	Location in Application
	H. United States Geological Survey topographical maps or other maps acceptable to the chair showing the entire length of the high voltage transmission line on all proposed routes	Figure 1-3; Appendix F
	I. identification of existing utility and public rights-of-way along or parallel to the proposed routes that have the potential to share right-of-way with the proposed line	§ 8.2
	J. the engineering and operational design concepts for the proposed high voltage transmission line, including information on the electric and magnetic fields of the transmission line	§§ 4.1; 8.7
	K. cost analysis of each route, including the costs of constructing, operating, and maintaining the high voltage transmission line that are dependent on design and route	§ 4.2
	L. a description of possible design options to accommodate expansion of the high voltage transmission line in the future	§ 8.1.2
	M. the procedures and practices proposed for the acquisition and restoration of the right-of-way, construction, and maintenance of the high voltage transmission line	§§ 8.3; 8.4; 8.5; 8.6
	N. a listing and brief description of federal, state, and local permits that may be required for the proposed high voltage transmission line	§ 2.5; Table 2-1
	O. a copy of the Certificate of Need or the certified HVTL list containing the proposed high voltage transmission line or documentation that an application for a Certificate of Need has been submitted or is not required	This document
Minn. R. 7850.1900, Subp. 3	<b>Environmental Information</b>	
	A. a description of the environmental setting for each site or route	§ 9.1
	B. a description of the effects of construction and operation of the facility on human settlement, including, but not limited to, public health and safety, displacement, noise, aesthetics, socioeconomic impacts, cultural values, recreation, and public services	§ 9.2
	C. a description of the effects of the facility on land-based economies, including, but not limited to, agriculture, forestry, tourism, and mining	§ 9.3
	D. a description of the effects of the facility on archaeological and historic resources	§ 9.4
	E. a description of the effects of the facility on the natural environment, including effects on air and water quality resources and flora and fauna	§ 9.5
	F. a description of the effects of the facility on rare and unique natural resources	§ 9.6

Authority	Required Information	Location in Application
	G. identification of human and natural environmental effects that cannot be avoided if the facility is approved at a specific site or route	Chapter 9
	H. a description of measures that might be implemented to mitigate the potential human and environmental impacts identified in items A to G and the estimated costs of such mitigative measures	Chapter 9
Minn. R. 7850.2100, Subp. 2 (applicable per Minn. R. 7850.3300)	<b>Notice of Project</b> Notification to persons on PUC's general list, to local officials, and to property owners	To be provided
Minn. R. 7850.2100, Subp 4	Publication of notice in a legal newspaper of general circulation in each county in which the route is proposed to be located.	To be published
Minn. R. 7850.2100, Subp. 5	Confirmation of notice by affidavits of mailing and publication with copies of the notices	Submit when available
Minn. R. 7850.4100	<b>Factors to be Considered in Permitting a HVTL</b> A. effects on human settlement, including, but not limited to, displacement, noise, aesthetics, cultural values, recreation, and public services	§ 9.2
	B. effects on public health and safety	§ 9.2
	C. effects on land-based economies, including, but not limited to, agriculture, forestry, tourism, and mining	§ 9.3
	D. effects on archaeological and historic resources	§ 9.4
	E. effects on the natural environment, including effects on air and water quality resources and flora and fauna	§ 9.5
	F. effects on rare and unique natural resources	§ 9.6
	G. application of design options that maximize energy efficiencies, mitigate adverse environmental effects, and could accommodate expansion of transmission or generating capacity	§§ 4.1; 8.1.2
	H. use or paralleling of existing rights-of-way, survey lines, natural division lines, and agricultural field boundaries	§§ 4.1; 8.2
	I. use of existing large electric power generating plant sites	Not applicable
	J. use of existing transportation, pipeline, and electrical transmission systems or rights-of-way	§ 8.2
	K. electrical system reliability	§§ 5.1; 5.9
	L. costs of constructing, operating, and maintaining the facility which are dependent on design and route	§ 4.2
	M. adverse human and natural environmental effects which cannot be avoided	Chapter 9

Authority	Required Information	Location in Application
	N. irreversible and irretrievable commitments of resources	§ 9.9
Minn. R. 7850.4300, Subps. 1 and 2	<b>Prohibited Routes</b> <b>Wilderness areas.</b> No high voltage transmission line may be routed through state or national wilderness areas <b>Parks and natural areas.</b> No high voltage transmission line may be routed through state or national parks or state scientific and natural areas unless the transmission line would not materially damage or impair the purpose for which the area was designated and no feasible and prudent alternative exists. Economic considerations alone do not justify use of these areas for a high voltage transmission line	No wilderness areas or parks are crossed
Minn. Stat. §216E.03, Subd.7 (applicable per Minn. Stat. §216E.04, Subd. 8)	<b>Considerations in designating sites and routes</b> (1) Evaluation of research and investigations relating to the effects on land, water and air resources of large electric power generating plants and high voltage transmission lines and the effects of water and air discharges and electric and magnetic fields resulting from such facilities on public health and welfare, vegetation, animals, materials and aesthetic values, including base line studies, predictive modeling, and evaluation of new or improved methods for minimizing adverse impacts of water and air discharges and other matters pertaining to the effects of power plants on the water and air environment	Chapter 9
	(2) Environmental evaluation of sites and routes proposed for future development and expansion and their relationship to the land, water, air and human resources of the state	§ 8.1.2
	(3) Evaluation of the effects of new electric power generation and transmission technologies and systems related to power plants designed to minimize adverse environmental effects	Not applicable
	(4) Evaluation of the potential for beneficial uses of waste energy from proposed large electric power generating plants	Not Applicable
	(5) Analysis of the direct and indirect economic impact of proposed sites and routes including, but not limited to, productive agricultural land lost or impaired	§ 9.3
	(6) Evaluation of adverse direct and indirect environmental effects that cannot be avoided should the proposed site and route be accepted	Chapter 9
	(7) Evaluation of alternatives to the applicant's proposed site or route proposed pursuant to subdivisions 1 and 2	Chapter 7
	(8) Evaluation of potential routes that would use or parallel existing railroad and highway rights-of way	§ 8.2; Chapter 9
	(9) Evaluation of governmental survey lines and other natural division lines of agricultural land so as to minimize interference with agricultural operations	§§ 8.2; 9.3.1
	(10) Evaluation of the future needs for additional high voltage transmission lines in the same general area as any proposed route, and the advisability of ordering the construction of structures capable of expansion in transmission capacity through	§§ 6.3; 6.6; 8.1.2

Authority	Required Information	Location in Application
	multiple circuiting or design modifications	
	(11) Evaluation of irreversible and irretrievable commitments of resources should the proposed site or route be approved	Chapter 9
	(12) When appropriate, consideration of problems raised by other state and federal agencies and local entities	Not applicable

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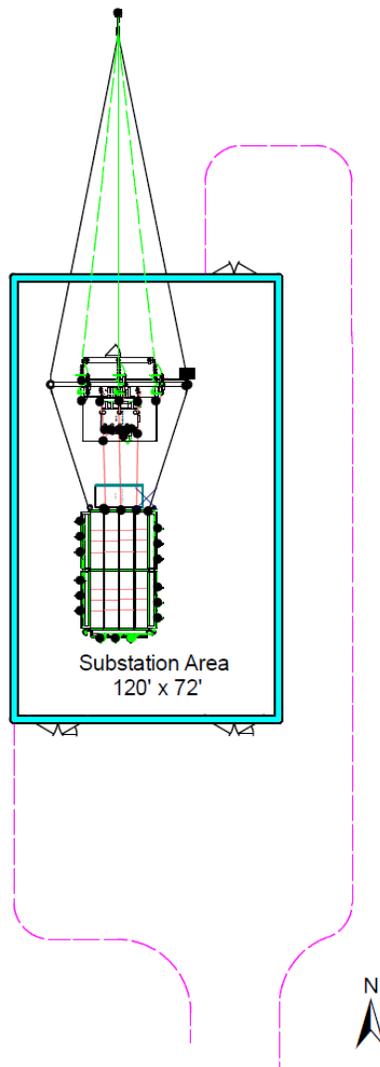
# **APPENDIX G**

## **Substation Plot Plans (Preliminary)**

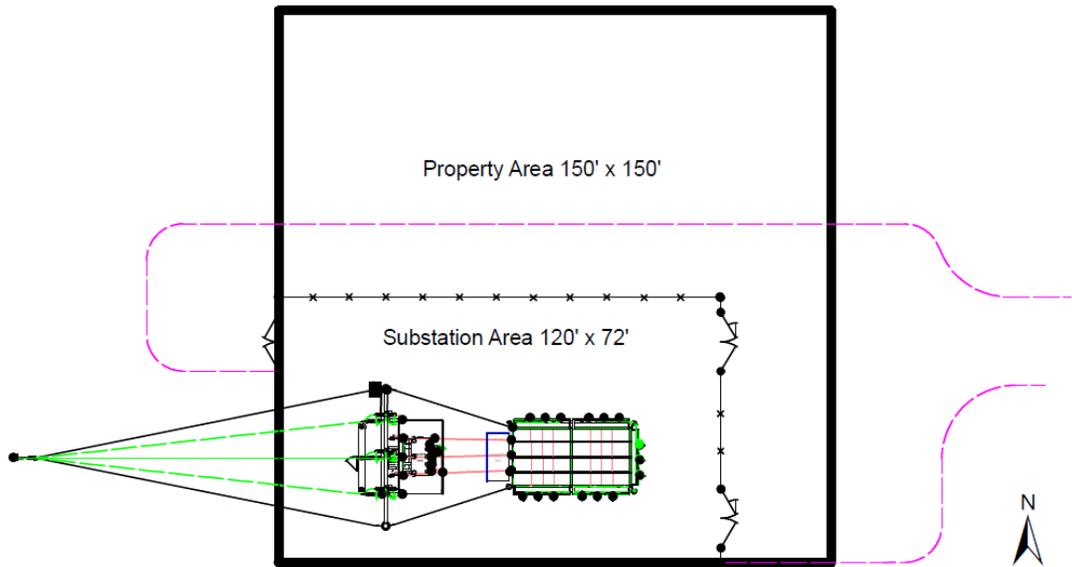
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Motley Substation  
Typical layout design



Fish Trap Lake Substation  
Typical layout design



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# **APPENDIX H**

## **Great River Energy Demand Side Management Programs**

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## **GREAT RIVER ENERGY DEMAND SIDE MANAGEMENT PROGRAMS**

### **A. The name of the committee, department, or individual responsible for the applicants energy conservation and efficiency programs, including load management;**

Great River Energy's Membership and Energy Markets Division is responsible for energy conservation and load management programs.

### **B. A list of the applicant's energy conservation and efficiency goals and objectives;**

- Per Minnesota Statute 216B.241, Subd. 1c. Great River Energy's 2014 energy conservation goal for its member cooperatives is equal to 165,055,348 kWh at the generator. This figure represents 1.5% of Great River Energy's members average weather normalized sales for 2011-2012, less sales to customers that have received formal CIP exemptions from the Minnesota Department of Commerce. The Minnesota Department of Commerce, Division of Energy Resources has approved Great River Energy's 2015 program plan, which includes a broad array of programs that cover the residential, commercial, industrial and agricultural sectors.
- Per Great River Energy's load management programs, the goal is to maximize the value of current load management programs by identifying new revenue streams available in a FERC approved ISO market. Opportunities include load management as market energy, regulation and/or reserves.

### **A description of the specific energy conservation and efficiency programs that the applicant has considered, a list of those that have been implemented and the reasons why the other programs have not been implemented;**

Great River Energy periodically conducts feasibility studies on potential programs. Programs with verifiable energy reductions and no market barriers that are found to be cost effective are implemented. Programs that are difficult to quantify with significant market barriers, or are not cost effective are not added to the program portfolio.

A brief description of each program, by program type, that allows Great River Energy to achieve its strategic conservation and load management goals is provided below.

## **INDIRECT CONSERVATION PROGRAMS**

### Energy Education

Member cooperatives assist residential and commercial/industrial customers to help make them aware of the available energy conservation and energy efficiency programs through brochures, bill inserts, radio advertisements, newsletters, workshops, fairs, trade shows, and one-on-one consultation.

### Residential Electrical Evaluation and Consultation

The residential electrical evaluation and consultation program is targeted at customers who contact their member cooperative and express concern over their electrical usage. When a customer contacts their cooperative representative, the representative reviews general appliance usage and costs with the customer. The review provides an overview of the customer's energy usage and provides suggestions on various means by which the customer can conserve energy.

## **DIRECT CONSERVATION PROGRAMS - RESIDENTIAL**

### Energy Assessments/Audits

Members offer free or reduced cost energy audits for residential and commercial customers. Cooperatives have staff specifically trained to conduct basic audits. In addition to the basic audits, participating members work with local Community Action Programs (CAP) agencies to target low-income households that could benefit from energy conservation education.

Commercial consumers are provided with either a walk-through energy audit performed by cooperative staff or a more comprehensive audit performed by a professional consultant. Costs for the comprehensive audit are typically shared 50 percent by Great River Energy, through the distribution cooperative, and 50 percent by the customer.

### Residential Cooling

Residential air conditioning is a critical load to Great River Energy and its member distribution cooperatives. High-efficiency air conditioners improve system load factor, reduce peak capacity requirements, improve system efficiencies, and lower customer's cooling costs. Great River Energy, through its member cooperatives, provides a rebate for central air conditioners that have a Seasonal Energy Efficiency Ratio (SEER) of 14 or greater. This increased efficiency results in energy and demand savings during Great River Energy's critical summer period.

### Residential Air Source Heat Pump (ASHP)

ASHPs provide summer cooling and spring/fall heating in residential or commercial installations. ASHPs are sized for cooling. In the cooling mode, the ASHP functions as a central air conditioner and is load managed during the summer per Great River Energy's cycled air conditioning control strategy. In the heating mode, the ASHP provides very efficient space heating to a temperature of approximately 20 degrees F. At this temperature the ASHP automatically shuts off and the secondary heating system (typically a natural gas or liquid propane furnace) heats the home. If conditions should require load control, Great River Energy also has the ability to control ASHPs during the heating season. ASHPs help Great River Energy improve load factor, reduce peak capacity requirements, and improve system efficiencies.

### Quality Installation Program for Central Air Conditioners and Air Source Heat Pumps

In addition to offering equipment rebates, Great River Energy and its member cooperatives provide additional incentives for quality installation of high-efficient central air conditioners and air-source heat pumps. In order to generate maximum electric energy savings, it is essential that the equipment is installed correctly and according to manufacturer's specifications. The quality installation program seeks to validate four components of the installation:

- 1) Air flow
- 2) Duct Sealing
- 3) Proper sizing
- 4) Refrigerant charge

New central air conditioners and air source heat pumps with an overall efficiency of 13 SEER or higher are eligible. The system must be matched, which means the outdoor condenser unit and the indoor evaporator coil are designed by the manufacturer to work together to provide top performance and maximum efficiency.

### Residential HVAC Tune-Up

Rebates are available to members who hire a registered and/or professional Heating Ventilation and Air Conditioning (HVAC) contractor to perform a tune-up of an existing, working Cycled Air Conditioner (CAC) or ASHP. This program is designed to improve the efficiency and maintain the operation of CACs and ASHPs.

### Residential Cycled Air Conditioning and ASHP

The cycled air conditioning program provides customers with an incentive to allow Great River Energy to cycle (15 minutes on, 15 minutes off) their central air conditioner during periods of high peak demand. The cycling provides approximately one kilowatt (kW) of demand reduction per air conditioner. Air conditioning is a critical load to the member distribution cooperatives and to Great River Energy. The program helps improve system load factor, reduce peak capacity requirements, and improve system efficiencies.

### Residential Geothermal

Ground Source Heat Pumps (GSHPs) have proven to be one of the most efficient space conditioning options with the added potential of significant energy savings. Acceptance of this technology continues to grow nationwide. GSHPs use the latent heat in the earth as a heat sink and a heat source. By utilizing a series of buried heavy-duty plastic pipes filled with a food-grade antifreeze solution as the heat transfer medium, GSHPs are highly efficient in both heating and cooling modes. This high efficiency results in reduced kWh usage in the cooling season and can also significantly reduce the total energy used to heat a home when compared to alternative heating systems. Along with the kilowatt hour (kWh) savings, there is capacity savings when the GSHP is part of the load management program.

### Income Eligible: AC Tune-UP

Participating member distribution cooperatives offer air conditioning tune-ups to low-income customers in conjunction with local CAP agencies. The role of a CAP agency is to help identify customers that would benefit from this service and to provide instruction to local HVAC service vendors authorized under this program to provide tune-ups. The tune-up service includes:

- Cleaning condenser coil
- Checking Freon level and pressures
- Checking indoor filter
- Testing all controls
- Blowing out drain line
- Visually inspecting the entire system
- Educating homeowner on operation

The low-income air conditioner tune-up program improves air conditioner efficiency, which in turn lowers the customer's energy bill.

### Income Eligible

Participating member distribution cooperatives provide renters or rental property owners with help to improve the energy efficiency of the property. Programs include high efficiency space heating and cooling, lighting retrofit, appliance replacement, energy saving water kits, Habitat for Humanity, and air conditioner tune-ups.

### Residential Lighting

Lighting makes up ten percent of a typical home's electricity consumption. The home lighting program is an energy conservation program in the form of a rebate that encourages the conversion from incandescent lighting to more energy efficient lighting – particularly compact fluorescent lighting (CFLs) and light emitting diodes (LEDs). Promotions are also offered throughout the year at major retailers for instant in-store savings (Wal-Mart and Target).

### Bulb Recycling

This program is designed to support Minn. Stat. §115A.932 to encourage residential members to properly recycle CFLs. Great River Energy offers \$0.50 per lamp rebate through local retailers. Free recycling was available in 2008-2009 through participating Menards stores.

### High Efficiency Water Heat

Customers replacing old inefficient electric water heaters with new high efficiency electric water heaters receive a cash rebate from a participating distribution cooperative. The minimum acceptable water heater has insulation of R16 or greater, and an energy efficiency factor of 0.92. The average water heater replaced has an efficiency factor of 0.82 or less.

### Residential Dual Fuel and Pool Heat

Dual fuel space heating is a heating option for the conditioned living space in residential customers' homes that use only electric heat as the primary heat source. Cooperative members must have a backup heat source (propane or fuel oil) to provide heat to the entire living area or pool. Member incentives may include all or a portion of the costs to install load controls on equipment.

### Hot Water Savings

This program offers an opportunity for residential members to purchase and install a variety of energy saving water equipment at a significantly reduced price. The kit includes shower head, kitchen aerator, bathroom aerators, hot water temperature card, and teflon tape to assist with the installation. Kits are provided at no cost to income-eligible members and CAP agencies for installation in income-eligible properties.

### Electric Vehicle and ChargeWise<sup>SM</sup>

Great River Energy provides a specific rate for charging on and off-road electric vehicles such as Plug-in Hybrid Electric Vehicles (PHEV), golf carts, forklifts, etc., which can operate "around-the-clock" from a nightly eight hour charge. Great River Energy will rebate up to \$500 of the installation cost for the ChargeWise<sup>SM</sup> kit. The ChargeWise<sup>SM</sup> program requires the program participant be a residential customer of an all requirements member.

## **DIRECT CONSERVATION PROGRAMS – COMMERCIAL, INDUSTRIAL, and AGRICULTURE (CI&A)**

### Agriculture

Agricultural prescriptive and custom rebates are available to members for the installation of various types of high efficiency agricultural equipment. Rebates are offered for the following applications:

- Ventilation
- Dairy-Free Heater
- Dairy Plate Cooler
- Hog Farrowing
- Compressor Heat Recovery Systems
- Scroll Compressors for Bulk Tank
- Low Pressure Irrigation Systems
- Livestock Water Heaters

### Compressed Air

This program rebates members for installing compressed air systems, equipment updates or system improvements that result in lower energy usage.

### Custom

The CI&A energy grant and rebate program provides cash incentives to qualified applicants for energy efficiency improvements to their business, industry, or farm. Interested customers must complete a grant application form, which describes the intended energy efficiency improvement measures and calculates the expected energy and demand savings. The individual member cooperative evaluates the proposal for viability and cost effectiveness, and those that rank the highest are awarded grants to help offset the cost of their project. Grant funds are typically used for the installation of high efficiency lighting, motors, adjustable speed drives, refrigeration compressors, high efficiency air conditioning, and other energy-conserving equipment. The program also includes a New Construction Rebate for Lighting and Motors. This rebate is on a per fixture basis or on the horsepower rating of the motor.

### Energy Assessments/Audits

Members offer free or reduced cost energy audits for residential and commercial customers. Cooperatives have staff specifically trained to conduct basic audits. In addition to the basic audits, participating members work with local CAP agencies to target low-income households that could benefit from energy conservation education.

Commercial consumers are provided with either a walk-through energy audit performed by cooperative staff or a more comprehensive audit performed by a professional consultant. Costs for the comprehensive audit are typically shared 50 percent by Great River Energy, through the distribution cooperative, and 50 percent by the customer.

## **COMMERCIAL HEATING VENTILATION AND AIR CONDITIONING (HVAC)**

Program rebates are offered to members for qualifying commercial cooling equipment installation. Only new and complete central air conditioning units and remote condensing unit retrofits qualify.

### Commercial GSHPs

GSHPs have proven to be one of the most efficient space conditioning options with the added potential of significant energy savings. This high efficiency results in the reduction of kWh usage in the cooling season and can also significantly reduce the total energy used to heat a building when compared to alternative heating systems. A number of building types are able to

take advantage of the benefits of heating and cooling with GSHPs and the program targets schools, churches, and other commercial and industrial buildings where appropriate.

#### Commercial New Construction Lighting

Prescriptive and custom rebates are available for lighting projects in retrofit, new construction and LED traffic signal retrofit applications. Specific dollar amounts, per fixture, vary based on the type of luminaries installed, lamp wattage, length and number of lamps per fixture.

#### Commercial Retrofit Lighting

Rebates are offered for retrofit lighting projects in existing structures. They are determined individually, based on equipment being removed and replaced with more efficient lighting or controls. For projects not covered by the prescriptive rebate application form, a custom rebate will calculate the energy savings and determine the rebate amount.

#### Commercial Motors and Drives

This program offers rebates for new or existing retail businesses. Rebates are determined on an individual basis using the prescriptive rebate forms for the motors and drives being installed. Motors that meet the National Electrical Manufacturers Association (NEMA) Premium Efficiency Motor Standards for retrofit applications are eligible.

#### Commercial Whole Building Energy Efficiency

Member cooperatives provide energy efficient educational materials and speakers for little or no cost to members at community meetings, key account meetings and other public informational gatherings. Member cooperatives also offer design assistance, building commissioning, building recommissioning, and audits that are specific for the commercial, industrial, or agricultural members needs.

#### Vending Controls

Rebates are available for control devices that are either occupancy or moisture sensor-based installed on beverage vending machines, glass-front beverage machine coolers or glass-front refrigerated display case doors.

### **DIRECT LOAD CONTROL PROGRAMS**

#### Interruptible CI&A Loads

The Interruptible CI&A Loads Program provides a reduced electric rate to CI&A customers that can reduce their demand by a minimum of 25 kW during periods of high demand.

#### Interruptible Air Conditioning

The interruptible air conditioning program is available to residential, commercial, and industrial members annually from May through September. During these months members agree to have their air conditioning systems interrupted for up to six (6) hours on event days.

#### Interruptible Irrigation

Interruptible commercial irrigation systems, generally agricultural, turf growers, or golf courses, can be interrupted once per day for up to four hours.

### Dual Fuel Space Heating

Dual fuel space heating systems are a combination of interruptible electric and non-electric space heating. Both the primary and secondary heating systems are sized for the entire heating load of the home. During periods of high electric demand, the interruptible electric heating system is shut off and the secondary (non-electric) heating system heats the home.

### Electric Thermal Storage (ETS) Space Heating

The ETS space heating program uses off-peak electric energy to provide 100% of a home's heating requirements. During the nightly eight-hour ETS charge time, heat is stored in a water or ceramic medium. There are three commonly available storage heating configurations: central furnaces, room or dispersed heaters, and slab. Customers receive a special off-peak rate in return for allowing Great River Energy to control their systems each day during the on-peak hours.

### Electric Thermal Storage (ETS) Water Heating

The ETS water heating program uses off-peak electric energy coupled with a high efficient water heater with sufficient storage capacity to supply the user's hot water needs. The water heaters are charged between 11:00 pm and 7:00 am each evening.

### Interruptible Water Heating

Interruptible water heaters can be interrupted during periods of high electric demand for up to eight hours per day. Customers receive a special interruptible rate in return for allowing Great River Energy to control their water heaters during peak periods.

### Electric Thermal Storage (ETS) Pool Heating

The ETS pool heating program uses off-peak electric energy to heat water for swimming pools. Swimming pools can be sufficiently heated during the nightly eight-hour off-peak charge time. Member distribution cooperatives provide participants a reduced electric rate for the ability to interrupt this load during the on-peak hours.

### Off Peak Electric Vehicles and "ChargeWise<sup>SM</sup>"

The Electric Vehicle and "ChargeWise<sup>SM</sup>" program charges electric vehicle batteries using only off-peak energy between 11:00 pm and 7:00 am nightly. Examples of qualifying vehicles are electric forklifts, golf carts, and residential PHEVs and EVs.

## **WELLSPRING RENEWABLE ENERGY PROGRAM**

The Wellspring renewable wind energy program is a voluntary "green pricing" program that offers wind-generated electricity to cooperative members. Great River Energy was the first utility in the five-state region to offer such a program. Green pricing is a voluntary service that allows members the opportunity to purchase 100 kWh blocks of renewable energy and pay a premium on their electric bill to cover the incremental cost.

## **EVALUATED PROGRAMS**

### Pool Pump

The Pool Pump program is currently available on a pilot basis. The program is available to members that have an in-ground swimming pool. Members replacing an old inefficient pump with a new high efficiency pump can receive a rebate from their participating distribution cooperative.

### PC Power Management

Connexus Energy, Dakota Electric, and Minnesota Valley Electric Cooperative are currently evaluating PC Power Management based on the recommendations provided in a report titled,

“Electricity Savings Opportunities for Home Electronics and Other Plug-In Devices in Minnesota Homes”. The report was completed in 2010 by the Energy Center of Wisconsin. The program allows a member to download an internet application that manages the energy used by a home PC based on an energy use profile that automatically switches the computer to a hibernate mode when it is not used for a predetermined length of time.

#### Data Centers

Data center rebates are not a specific program, rather they are covered under the custom grant program or by individual measures done at the site (HVAC, Lighting, Controls, etc.)

#### Battery Energy Storage

The intent of the program was to store off-peak energy in lead acid batteries to be discharged during the on-peak hours. Great River Energy’s analysis showed that the cost of the units and the kWh capacity was not able to yield a positive return on investment, via energy arbitrage, over the life of the unit.

#### Ice Energy Storage

The potential to store off-peak energy in large insulated vessels to be discharged during on-peak hours was investigated. The units are deployed in conjunction with existing commercially packaged HVAC rooftop units. When the HVAC unit calls for cooling, a pump circulates coolant through coils in the ice and transfers the cold fluid to a separate condenser installed in the HVAC unit. The program was not found to be cost effective.

### **C. A description of the major accomplishments that have been made by the applicant with respect to energy conservation and efficiency; Conservation and Efficiency**

Great River Energy has met the CIP goals outlined since 2010 when the legislation regarding the Minnesota Energy Conservation Goals took effect. Prior to 2010, Great River Energy successfully met the internally established goals for 2008 and 2009. Additional information on the success of the conservation and load management programs is provided in the tables on the following pages.

**2008:** 78,000,000 kWhs saved (0.7% of member sales)

**2009:** 94,000,000 kWhs saved (0.85% of member sales)

**2010 All Requirements Members\*:** 117,226,945 kWh saved at the generator equaling 1.34% of member sales.

**2011 All Requirements Members:** 110,152,388 kWh saved at the generator equaling 1.27% of member sales.

**2012 All Requirements Members:** 83,744,605 kWh saved at the generator equaling 1.0% of member sales.

**2013 All Requirements Members:** 99,134,162 kWh saved at the generator equaling 1.17% of member sales.

\* Twenty (20) all-requirements members purchase all of the power and energy needed to satisfy their electricity sales from Great River Energy, with limited exceptions for amounts historically supplied by the Western Area Power Administration (“WAPA”) or from renewable generation facilities directly interconnected at a distribution level. Great River Energy has the responsibility and obligation to plan for and supply all of the future power and energy needs of the all-requirements member rate class.

Eight (8) fixed members purchase a finite contractual amount of power and energy from Great River Energy that does not change based on their current actual use or need. As such, the energy conservation savings achieved by the fixed members does not reduce Great River Energy’s power supply obligations or impact its need for future generation resources. Some fixed members purchase power and energy historically supplied by WAPA or from renewable generation facilities directly interconnected at the distribution level. The fixed members have made arrangements for other wholesale suppliers to assume responsibility and obligation to plan for and supply all of their future power and energy needs.

Total kWh saved does not include kWh savings generated through supply side investments. In 2010 Great River Energy and its member cooperatives realized an additional 431,900,000 kWh in savings associated with improvements to generation and cooperatives distribution assets.

Generator kWh savings add 11.5% to the energy savings that are realized at the end use member. This amount is an average reflecting the line-losses that occur through the Transmission and Distribution of electricity to end use members.

<b>CIP Savings and Expenditures – All Requirements Members Only Great River Energy 2008-2013</b>						
<b>CIP Year</b>	<b>Annual kWh</b>	<b>Lifetime kWh (based on average measure lifetime)</b>	<b>Annual KW</b>	<b>Aggregate KW</b>	<b>Annual CIP Spending</b>	<b>Aggregate CIP Spending</b>
<b>2008</b>	70,432,275	880,403,438	125,825	125,825	\$16,248,830	\$16,248,830
<b>2009</b>	79,467,727	998,114,651	77,418	203,243	\$18,759,091	\$35,007,921
<b>2010</b>	117,226,945	1,441,891,424	41,634	244,877	\$20,598,092	\$55,606,013
<b>2011</b>	110,152,388	1,371,764,400	35,400	280,277	\$18,306,921	\$73,912,934
<b>2012</b>	83,744,605	1,042,899,483	20,189	300,466	\$16,274,707	\$90,187,638
<b>2013</b>	99,134,162	1,524,683,411	38,598	339,064	\$15,575,524	\$105,763,162
<b>Total</b>	<b>560,158,102</b>	<b>7,259,756,807</b>	<b>339,064</b>	<b>339,064</b>	<b>\$105,763,162</b>	<b>\$105,763,162</b>

\*

## Demand Side Management

Additional Controlled Load Great River Energy 2011-2013			
Additional Controlled Load Installed by Customer Class (kW)			
	2011	2012	2013
<b>Residential</b>	9,000	8,700	9,000
<b>Commercial</b>	1,000	6,000	1,000
<b>Total*</b>	<b>10,000</b>	<b>14,700</b>	<b>12,013</b>
Total Controlled Load Installed by Load Type (MW)			
	2011	2012	2013
<b>Dual Fuel</b>	137	140	143
<b>Cycled Air Conditioning</b>	104	106	108
<b>Interruptible Water Heating</b>	38	39	36
<b>Irrigation</b>	31	31	30
<b>Interruptible C&amp;I</b>	165	170	176
<b>Total MW</b>	<b>475</b>	<b>486</b>	<b>493</b>

\* The effect of energy conservation and load management programs on load is implicit in Great River Energy's forecasts. The forecast is calculated using raw load data, and does not make any adjustments that attempt to measure the impact of energy efficiency or load management activities. DSM and conservation programs do have a significant effect in reducing the need for new resource additions. In aggregate, Great River Energy's load management programs are capable of reducing summer and winter peak loads by 15%.

### **D. A description of the applicant's future plans through the forecast years with respect to energy conservation and efficiency.**

Great River Energy and its Members have developed a robust portfolio of energy efficiency programs that provide measureable value for member-consumers in Minnesota. These programs are a dynamic and active part of Great River Energy's planning and daily operations and provide member-consumers with options for managing their energy use and associated costs.

The key to maintaining success hinges on the ability to promote current programs while developing new programs that find a sustainable balance between reducing energy and maintaining member-consumer satisfaction. Success can be seen not only in the achievement of conservation goals but also in the creation of new programs. An ongoing goal at Great River Energy is to create new programs that provide more opportunities for member-consumer

participation. On average, Great River Energy creates two new energy efficiency programs each year. Recent goals have been achieved by reaching out and partnering with large retailers such as Wal-Mart and Target. Continuing to reach out to local retailers and others across the industry will enable Great River Energy to identify new opportunities that will lead to successful achievement of its strategic conservation goals.

**E. A quantification of the manner by which these programs affect or help determine the forecast provided in response to part 7849.0270 subpart 2, a list of their total costs by programs, and a discussion of their expected effects in reducing the need for new generation and transmission facilities.**

<b>Energy Conservation and Demand Side Management Budgets 2014-2016</b>			
	<b>2014 Approved Budget</b>	<b>2015 Proposed</b>	<b>2016 Proposed</b>
<b>Energy Conservation</b>			
Residential	\$6,394,148	\$5,894,148	\$5,894,148
Commercial	\$2,605,852	\$2,605,852	\$2,605,852
Income Eligible	\$1,189,076	\$1,189,076	\$1,189,076
<b>Total</b>	<b>\$10,189,076</b>	<b>\$9,689,076</b>	<b>\$9,689,076</b>
<b>Demand Side Management</b>			
Residential	\$6,178,798	\$5,569,688	\$5,569,688
Commercial	\$388,839	\$288,839	\$288,839
<b>Total</b>	<b>\$6,567,638</b>	<b>\$5,858,527</b>	<b>\$5,858,527</b>
<b>Total Budget*</b>	<b>\$16,756,714</b>	<b>\$15,547,603</b>	<b>\$15,547,603</b>

\*2014-2016 Budget projections are based on the statutory mandated spending requirements and will change with changes in subsequent annual revenues. Currently Minnesota Statutes §216B.241, Subd. 1b. requires that cooperative associations spend a minimum of 1.5% of their gross operating revenues from service provided in the state, excluding gross operating revenues from service provided to large electric customer facilities indirectly through a distribution cooperative electric association. Cooperatives are allowed to use 50% of this minimum spending requirement on load management program expenditures.

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# **APPENDIX I**

## **List of Landowners within Proposed Route**

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ROBERT L ANDERSON  
290387000

MICHAEL & ELAINE TRUST AUGER  
290183000

MICHAEL & ELAINE TRUST AUGER  
290183000

DONALD E AUSLAND  
24-370-0160

DONALD E AUSLAND  
24-370-0160

WENDY & ATHONY, SR BANKER  
24-015-2300, 24-016-1001

ALICE M BARKER  
180072000

JENE & LAURIE BARTHEL  
180125000

MICHAEL M BECKER  
180149000

MELVIN R & SHARON L BELL  
180076000

BERNON & ELLEN BENSON  
180136000

NATHAN BETTIS  
180144000, 180145000

MARKAL L & SUSAN M BETTIS  
180051001

STANLEY BETTIS  
180051000

MARK L JR & VANESSA L BETTIS  
180034000

SARA-CLAIRE & RALPH M  
BIRKHOLTZ  
24-370-0180, 24-370-0140,  
24-370-0150

RALPH BIRKHOLTZ  
24-011-1200, 24-011-1300,  
24-002-3400

CHAD M BIRKHOLTZ  
180109000, 180110000

KRISTIN LEE BJERGA  
03-026-3301

MIKKEL D & JUDITH BJERGA  
03-035-3300, 03-034-1100

KRISTEN BLANN  
08-0026200

KARL H & JOYCE E BRAUN  
290051000

WALTER G BRAUNWORTH  
24-016-1102

LONNIE BRICHACEK  
290197000

LONNIE BRICHACEK  
290197000

STEVEN L & ROSEMARY M BROWN  
24-370-0170

KEVIN R & PHYLLIS L BROWN  
290035002

KEVIN R & PHYLLIS L BROWN  
290035002

RAYMOND BRUESKE  
290029000

CHARLES B & KIMBERLY S CARLSON  
290051001

JOYCE CARLSON  
24-023-2100

STEVEN D & CARLSON  
24-023-2300

JASON W & ALLISON E CARRY  
180031000

JOHN R CHENOWETH  
03-026-3303

KENNETH B & CLEVELAND  
03-027-1401, 03-027-1402

ROBERT A & ROXANNE R COKLEY  
180102001

DAVID M CRIDER  
03-026-3302

CHADD & DEANNA DANIELSON  
180063004

CHADD & DEANNA DANIELSON  
180063002

CHADD & DEANNA DANIELSON  
180063003

LISA DEGEEST  
180102000

DANIEL P & BARBARA J DONAHUE  
24-022-2200

RICHARD D & ARBUTUS F  
DVORAK WAYNE J & JOAN E  
DVORAK  
C/O KEVIN DVORAK  
08-0035900

RICHARD D & ARBUTUS F DVORAK,  
& WAYNE J & JOAN E DVORAK  
C/O KEVIN DVORAK  
08-0035900

BRUCE A EKERT  
180160001

BRUCE A EKERT  
180160001

JUNE ETZLER  
290072000

STEPHEN J FARR  
180113000

STEPHEN J FARR  
180113000

KEITH R & DEBBIE L FERDON  
24-015-3301

RICHARD M & PATRICIA FLANSBURG  
180134000

KEVIN D FLANSBURG  
180161000

MICHAEL & JOSHUA FLEISCHACKER  
24-011-4300

ELIZABETH FORD  
290793000, 290794000

ELIZABETH FORD  
290794000

MARK D FRISK  
180155001

MARK D & SHERRY L FRISK  
180166000, 180155000

GREG & SHERRY FRISK  
180034001

MARK D FRISK  
180154000, 180151000,  
180155001

GREG & SHERRY FRISK  
180034001

MARC R & LORENA M GABIGER  
180138000

MARC R & LORENA M GABIGER  
180138000

JEFFREY J & NATALIE T GALLATI  
290220000

TROY GALLICKSON  
24-016-0008

AARON & HANNAH GIGLEY  
180139000

ANGELINE A GILLSON  
24-014-3400

ANGELINE A GILLSON  
24-014-3400

RITA GLEBE  
290401000

RITA GLEBE  
290387002, 290401000

LARRY L & SHIRLEY G  
GODEJOHN  
290349000

LARRY L & SHIRLEY G GODEJOHN  
290349000

JANE A GODFREY  
24-401-0110

JANE A GODFREY  
24-401-0110

JAMES GOFF  
290198000

TROY A & NEVA M GULLICKSON  
24-016-1100

SHARON A HARRISON, TRUSTEE  
24-016-1401, 24-015-2301

SUSAN HEALY  
24-023-3300

PHILIP L HEXOM  
08-0025800

JERRY LEE HICKS  
24-002-4401

JAY HICKS, TRUSTEE  
24-002-1200

BRIAN L & SUSAN M HOEMBERG  
290026000

GERALD & CATHERINE HOLKER  
180026000

GERALD & CATHERINE HOLKER  
180026000

ROGER L HOWELL  
24-016-4401, 24-021-1104

PATRICK & LAURIE HUMPHREY,  
TRSTEEES  
24-014-4301

SHIRLEY J & JOHN HYNES  
24-023-2101

JOHN JACKLITCH  
290199000

SHERIE LYNN JANSEN  
180096000

SHERIE LYNN JANSEN  
180097000

ROBIN ELAINE JOHNSON  
180032000

DEAN L & JILL C JOHNSON  
24-009-1100, 24-004-4400, 24-  
003-1100

ROBIN ELAINE JOHNSON  
180032000

DANIEL JOHNSON  
LORRAINE ANDREWS  
24-023-3200

JERRY JOSLIN  
290026001

JERRY JOSLIN  
290026001

JOHN E KERN  
180073000

CRAIG D & DONNA L KLIMEK  
24-010-3001, 24-010-3202

MARK A KNOSALLA  
180133000

RAYMOND & WANDA KNOSALLA  
180137000

JAMES J & FRANCES L KUNKEL  
24-016-1103

KIMBERLEY LEWIS  
KYLE D & SHERRI A LEWIS  
24-016-1402

KIMBERLEY LEWIS  
KYLE D & SHERRI A LEWIS  
24-016-1402

RICHARD A & SHARON L  
LUNDORFF  
290189001

WILLIAM O MACHEEL  
180063001

WILLIAM J & DOROTHY J MACHEEL  
180065000

HARVEY L MACHEEL  
180061000

SHAE L MACHEEL  
180061001

JANICE A MARCEAU  
290182000

ROBERT F MCGREE  
180087000

DONALD & MAUREEN MILLESS  
24-015-3201, 24-015-3300

DONALD K & MAUREEN A MILLESS  
24-021-1101

DONALD K & MAUREEN A  
MILLESS  
24-021-1101

MARGARET E MONTGOMERY  
24-009-4300

MARGARET E MONTGOMERY  
24-009-4300

DARYL S MOON  
24-004-1100, 24-004-1400

JEREMIAH A & MELISSA E  
MOULTON  
180166001

JEREMIAH A & MELISSA E MOULTON  
180166001

JAMES A NELSON  
180163000, 180165000

JAMES A NELSON  
180165000

CAROLE J NICHOLS  
180075000

JOHN, ETAL NOVOTNY  
03-026-2200

DAVID M ODDEN  
03-027-4401

SHIRLEY OLSON  
180070000

MARVIN THEODORE  
OSTROWSKI  
03-026-3304

GERALDINE J & DICK S PAVLACKY  
24-011-4200

GERALDINE J & DICK S PAVLACKY  
24-011-4200, 24-011-3400

ROGER M & MARGIE A PEDLEY  
292771000, 292770000

VERDE L & FAYE MARIE PEPIN  
180114000

VERDE L PEPIN  
180092000

RONALD & SUSAN PETERSON  
180056000, 180060000,  
180059000, 180063000,  
180058000, 180068000,  
180057000

DALE W & EMILIE C PETERSON  
180104000

DAVID M & KAREN T POGREBA  
08-0024500

DAVID M & KAREN T POGREBA  
08-0024500

MARK R & MELINDA J POSNER  
180066000, 180067000

MARTIN & LIANNE RARDIN  
180140000

JOHN F & DIANA RARDIN  
180135000

TERESA J RASSLER  
24-022-0003

TERESA J RASSLER  
24-022-0003

TERESA JOY RINGLE  
24-022-4102

MARY K RUDOLPH  
180074000

KERMIT W SEVERSON, REVOC TRUST  
290792000

EDWARD R SHEQUEN  
180161003

RODNEY D SMITH  
180071000

KIM K SMITH  
24-016-1104

EDWARD & ETHEL SMITH, REV  
TRUST  
290196000

EDWARD & ETHEL SMITH, REV  
TRUST  
290196000

KIMBERLY R SOBIECH  
08-0024400

VICTOR & AMY SOFIE  
24-014-3401

JOHN A & BARBARA J SORENSON  
24-010-2300, 24-010-2301

DENNIS J & ELAINE STANEK  
290050000

KYLE & JENNIFER STRICKLAND  
03-027-4001

JENNIFER & JESSICA SULLIVAN  
24-022-1100, 24-022-1200

THEODORE J & BECKY L SULLIVAN  
24-015-4400

MARK S SWEHLA  
24-010-2100

ROBERT D & ELENA M THIEDE  
180049000

SEAN & STEVE TINGUM  
03-027-4400

RONALD D & NANCY F  
TOWNSEND  
180129000

RONALD D & NANCY F TOWNSEND  
180142000, 180129000

LAVONNE R & BRADLEY A VAN  
VICKLE  
24-014-3101

DEVIN V & LANAE M VEIT  
290223004

DOUGLAS A & JACQUELINE M  
VOGEL  
180161002

DOUGLAS A & JACQUELINE M  
VOGEL  
180161002

RANDY WALTER  
180164000

CHARLES F & CAROLYN B WALTERS  
290414000

STEVEN WEIHRACH  
180122000

AUSTIN C WHITFORD  
24-016-1101

ROGER A WIELINSKI  
08-0024600

GARY A WINDSCHITL  
24-015-2210

RON & NANCY WINTERS  
290223000

RON & NANCY WINTERS  
290223000

KENNETH F & CONSTANCE M ZETAH  
290052001

A & K OLDENBURG LIVING  
TRUST  
290224001

AUGER FAMILY REV LIVING TRUST  
290194000

BURLINGTON NORTHERN RAILROAD  
24-022-0001, 24-016-0001,  
290473001, 08-0024701

CASS COUNTY  
24-014-4302

ERIC QUALE  
CROW WING POWER  
180103000

DEGEEST REVOC TRUST  
180050000

FRISK FAMILY TRUST  
180147000, 180146000,  
180033000, 180034002

FRISK FAMILY TRUST  
180034002

GALLATI FAMILY JOINT REV TRUS  
292903000, 292904000, 290226000,  
290221000, 292901000, 292902000,  
292905000, 290224000,  
29.0220.001

GRAND VIEW RANCH, LLC  
24-014-1200, 24-014-4300,  
24-014-1300, 24-023-1100,  
24-014-4200

LINCOLN GAS & BAIT INC  
290223001

MAPLE GROVE FARMS  
24-011-3100

MAPLE GROVE FARMS  
24-011-3100, 24-011-2400,  
24-014-2200, 24-014-2100

MILLER JAMES E & KELLY N REV  
TRUST  
290349001

MILLER JAMES E & KELLY N REV  
TRUST  
290349001

DAN MCCOURTNEY  
MINN POWER & LIGHT CO  
24-026-1400, 03-026-2302

MOTLEY TOWNSHIP  
180068002

MOTLEY TOWNSHIP  
180068002

POGREBA FAMILY 2005 REV  
TRUST  
290223003

POGREBA FAMILY 2005 REV TRUST  
290223003

ROSEWOOD ACRES, LLC  
03-035-2200

RURAL CELLULAR  
CORPORATION  
290035001

SHILLOCK-CLARK FAMILY TRUST  
180055005

SHILLOCK-CLARK FAMILY TRUST  
180055005

STANLEY & JOANA BETTIS TRUST  
290215000

STATE OF MINNESOTA  
180095000, 290020000

STATE OF MINNESOTA  
08-4000700, 08-4000600, 08-  
4000800, 08-4000900, 08-4002100,  
08-4002200, 08-4002300

STEINBRECHER DERALD L &  
NITA K REV TRUST  
180143000

SWECKER FAMILY 2005 REV TRUST  
180025001, 180031001

SWECKER FAMILY 2005 REV TRUST  
180025001

SWECKER FAMILY 2005 REV  
TRUST  
180031001

ZETAH FAMILY REV LIVING TRUST  
290052000, 290035000,  
290034000, 290027000

ZETAH FAMILY TRUST  
290187000, 290198001

ZETAH FAMILY TRUST  
290198001

ZETAH THOMAS S REVOC TRUST  
290188000

ZETAH THOMAS S REVOC TRUST  
290188000

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# **APPENDIX J**

## **Agency Correspondences**

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GREAT RIVER  
ENERGY®  
A Johnson Energy Company

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

September 16, 2014

Mr. Robert Maroney  
US Army Corps of Engineers  
St. Paul District  
180 5<sup>th</sup> Street East, Suite 700  
St. Paul, MN 55101-1678

**RE: Proposed Motley Area 115 kV Transmission Project  
Morrison, Cass and Todd Counties**

Dear Mr. Maroney:

Great River Energy is currently gathering data to be used in preparation of regulatory applications necessary to obtain approvals and permits for the construction of the proposed Motley Area 115 kilovolt (kV) Transmission Project in Cass, Todd and Morrison counties (see enclosed fact sheet and map). Great River Energy and Minnesota Power intend to seek a Certificate of Need and a Route Permit for the Project from the Minnesota Public Utilities Commission (Commission).

The proposed electric transmission improvement project in the Motley area will serve four primary purposes:

- Strengthen the electric transmission system in the Motley area, as the existing 34.5 kV system serving the area is becoming outdated and is reaching its maximum capacity.
- Provide electric service to the proposed new Crow Wing Power (CWP) Fish Trap Lake distribution substation that would provide electric power to a new pipeline pumping station proposed by Minnesota Pipe Line Company (MPL).
- Allow CWP to convert its existing Motley 34.5 kV distribution substation to operate at 115 kV due to the close proximity of the new 115 kV line to the existing substation.
- Prepare the transmission system for a future CWP distribution substation, which CWP anticipates needing in the Shamineau Lake area. This future substation could not be adequately served by the existing 34.5 kV transmission system in this area.

The Project will primarily be single circuit 115 kV transmission line with distribution underbuild in some areas. The enclosed project fact sheet includes more details on the project design.

If you would like to learn more about the project, a public open house meeting for the project will be held on:

**September 23, 2014, 4-7 p.m.**

at:

**Motley United Methodist Church  
847 3rd Avenue South  
Motley, Minnesota 56466**

Great River Energy is requesting information on the possible effects of the proposed project on floodplains, wetlands, and other important natural resources that occur in the project area. The transmission line will span several DNR public waters (see enclosed maps). Great River Energy will apply to the DNR Division of Lands and Minerals for a license to cross those waters.

The project will cross a number of NWI wetlands (see enclosed maps), many of which will be spanned. Great River Energy will work with the Corps and the counties to address impacts once design details are available.

A literature survey of cultural resources in the project area will also be conducted by Merjent.

We would appreciate receiving any written comments from your office by Friday, October 17, 2014. If you have any questions about this proposed project, please contact me at (763) 445-5210. If you wish to respond by e-mail, my address is [MStrohfus@GREnergy.com](mailto:MStrohfus@GREnergy.com).

Thank you for your attention to this important project.

Sincerely,  
GREAT RIVER ENERGY



Mark Strohfus  
Environmental Project Lead  
(763) 445-5210

Enclosures: Fact Sheet/Project Map, PWI/NWI Maps

S:\Legal\Environmental\Transmission\Projects\202972 Motley\Agencies\USACE\USACE Ltr - Motley.docx

# Motley Area 115 kV Transmission Project



Great River Energy  
12300 Elm Creek Blvd  
Maple Grove, MN 55369  
1-888-521-0130  
www.greatriverenergy.com



Crow Wing Power  
PO Box 507  
Brainerd, MN 56401  
1-800-648-9401  
www.cwpower.com

## Project Need

Great River Energy proposes to build and operate approximately 14 miles of new 115 kilovolt (kV) overhead transmission line in southern Cass County, eastern Todd County, and northern Morrison County to ensure the reliability of electric service to the members of Crow Wing Power (CWP). The project would:

- Strengthen the electric transmission system in the Motley area, as the existing 34.5 kV system serving the area is becoming outdated and is reaching its maximum capacity.
- Provide electric service to the proposed new CWP Fish Trap Lake distribution substation that would provide electric power to a new pipeline pumping station proposed by Minnesota Pipe Line Company (MPL).
- Allow CWP to convert its existing Motley 34.5 kV distribution substation to operate at 115 kV due to the close proximity of the new 115 kV line to the existing substation.
- Prepare the transmission system for a future CWP distribution substation, which CWP anticipates needing in the Shamineau Lake area. This future substation could not be adequately served by the existing 34.5 kV transmission system in this area.

As a component of this project, additional circuit breakers will be added to the existing Dog Lake Substation along with 1/2 mile of new 115 kV transmission line for system reliability.

## Project Description

The proposed project (see back for a map of the preliminary transmission line route) would connect to the existing Minnesota Power 115 kV "24" transmission line at Cass County Road 35, approximately 1-3/4 miles north of Highway 210. At this location Great River Energy would install a three-way switch structure. From the switch structure, the new 115 kV overhead transmission line would extend southerly approximately 14 miles to serve the new CWP Fish Trap Lake distribution substation on MPL's pipeline pumping station property at U.S. Hwy. 10 and Holt Road. The new transmission line would require a 100-foot-wide right of way, 50 feet on each side of the centerline. Some segments of the transmission line would carry lower-voltage distribution lines as underbuild. In most cases, single round wood poles ranging in height from 60 - 90 feet above ground would be used (see photo at right). The typical distance between poles would range from 250 - 400 feet.



Typical 115 kV Wood Transmission Line Structure

## Permitting

The Minnesota Public Utilities Commission (Commission) must issue a Certificate of Need (CON) and a Route Permit before the project can proceed. Great River Energy will submit a combined CON/Route Permit application containing relevant information that will help the Commission determine if there is sufficient need for the project and evaluate the proposed route and any alternative routes brought forth by the public. At the conclusion of the permitting process, the Commission will determine the final location of the proposed transmission facilities.

The public and regulatory agencies will have numerous opportunities to provide input during the CON and Route Permitting process, which is conducted and facilitated by Commission and Minnesota Department of Commerce (DOC) staff. Public meetings will be held and other opportunities will be provided for collecting comments and responses. The DOC will prepare an Environmental Assessment document for the project.

## Tree Removal

Removal of trees and certain vegetation along the transmission line right-of-way will be necessary for safety, construction and maintenance purposes. Landowners will be contacted prior to tree removal activities.

## Project Schedule

Project notification and open house	Fall 2014
Permitting	Late 2014 – late 2015
Easement acquisition	2016
Transmission line design	2016
Environmental permits	2016
Transmission line construction	2017
Logization	Late 2017

**For project updates and information, visit [greatriverenergy.com/Motley](http://greatriverenergy.com/Motley) or contact:**

Rick Heuring  
Sr. Field Representative  
Great River Energy - Land Rights Department  
(763) 445-5979  
rheuring@grenergy.com

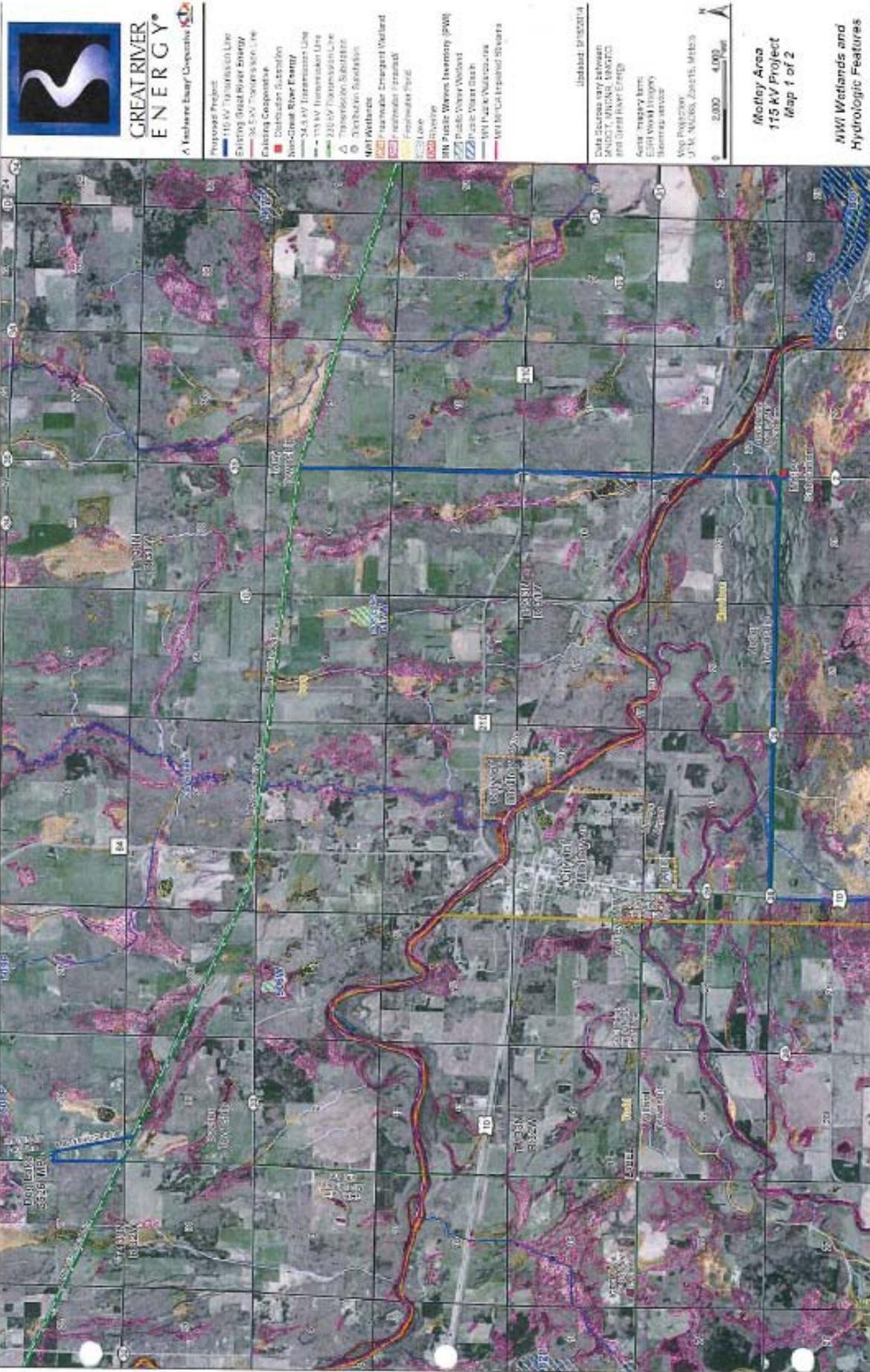
Mark Strohfus  
Environmental Project Lead  
Great River Energy - Environmental Services Department  
763-445-5210  
mstrohfus@grenergy.com

Date last revised: 8/26/2014

# Preliminary Project Study Area









DEPARTMENT OF THE ARMY  
ST. PAUL DISTRICT, CORPS OF ENGINEERS  
180 FIFTH STREET EAST, SUITE 700  
ST. PAUL MINNESOTA 55101-1678

21 November 2014

REPLY TO  
ATTENTION

Operations  
Regulatory (2014-03149-RQM)

Mr. Mark Strohfus  
Great River Energy  
12300 Elm Creek Blvd  
Maple Grove, Minnesota 55369

Dear Mr. Strohfus:

We have received a copy of the document entitled "Proposed Motley Area 115kV Transmission Project Morrison, Cass and Todd Counties" dated September 16, 2014 from Great River Energy. The location of this project covers portions of Morrison, Cass and Todd counties, Minnesota. Due to limited staff and resources, it is unlikely that U.S. Army Corps of Engineers Regulatory staff will review or comment on this document unless we receive a jurisdictional determination request and/or a permit application. In lieu of a specific response, please consider the following general information concerning our regulatory program that may apply to the proposed project.

If the proposal involves activity in navigable waters of the United States, it may be subject to the Corps of Engineers' jurisdiction under Section 10 of the Rivers and Harbors Act of 1899 (Section 10). Section 10 prohibits the construction, excavation, or deposition of materials in, over, or under navigable waters of the United States, or any work that would affect the course, location, condition, or capacity of those waters, unless the work has been authorized by a Department of the Army permit.

If the proposal involves deposition of dredged or fill material into waters of the United States, including discharges associated with mechanical land clearing, it may be subject to the Corps of Engineers' jurisdiction under Section 404 of the Clean Water Act (CWA Section 404). Waters of the United States include navigable waters, their tributaries, and adjacent wetlands (33 CFR § 328.3). CWA Section 301(a) prohibits discharges of dredged or fill material into waters of the United States, unless the work has been authorized by a Department of the Army permit under Section 404. Information about the Corps permitting process can be obtained online at <http://www.mvp.usace.army.mil/regulatory>.

The Corps' evaluation of a Section 10 and/or a Section 404 permit application involves multiple analyses, including (1) evaluating the proposal's impacts in accordance with the National Environmental Policy Act (NEPA) (33 CFR part 325), (2) determining whether the proposal is contrary to the public interest (33 CFR § 320.4), and (3) in the case of a Section 404 permit, determining whether the proposal complies with the Section 404(b)(1) Guidelines (Guidelines) (40 CFR part 230).

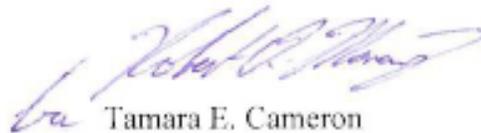


If the proposal requires a Section 404 permit application, the Guidelines specifically require that "no discharge of dredged or fill material shall be permitted if there is a practicable alternative to the proposed discharge which would have less adverse impact on the aquatic ecosystem, so long as the alternative does not have other significant adverse environmental consequences" (40 CFR § 230.10(a)). Time and money spent on the proposal prior to receiving a Section 404 permit cannot be factored into the Corps' decision whether there is a less damaging practicable alternative to the proposal.

If an application for a Corps permit has not yet been submitted, the project proposer may request a pre-application consultation meeting with the Corps to obtain information regarding the data, studies or other information that will be necessary for the permit evaluation process. A pre-application consultation meeting is strongly recommended if the proposal has substantial impacts to waters of the United States, or if it is a large or controversial project.

For further information or to request a pre-application consultation meeting, please contact Rob Maroney at 651-290-5766, the Corps' project manager for Morrison and Todd counties in which this proposal is located.

Sincerely,



Tamara E. Cameron  
Chief, Regulatory Branch



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

September 16, 2014

Ms. Lisa Joyal  
Minnesota Department of Natural Resources  
Natural Heritage and Nongame Research Program  
500 Lafayette Road, Box 25  
St. Paul, MN 55155

**RE: Proposed Motley Area 115 kV Transmission Project  
Morrison, Cass and Todd Counties**

Dear Ms. Joyal:

Great River Energy is currently gathering data to be used in preparation of regulatory applications necessary to obtain approvals and permits for the construction of the proposed Motley Area 115 kilovolt (kV) Transmission Project in Morrison, Cass and Todd counties (see enclosed fact sheet and map). Great River Energy and Minnesota Power intend to seek a Certificate of Need and a Route Permit for the Project from the Minnesota Public Utilities Commission (Commission).

The proposed electric transmission improvement project in the Motley area will serve four primary purposes:

- Strengthen the electric transmission system in the Motley area, as the existing 34.5 kV system serving the area is becoming outdated and is reaching its maximum capacity.
- Provide electric service to the proposed new Crow Wing Power (CWP) Fish Trap Lake distribution substation that would provide electric power to a new pipeline pumping station proposed by Minnesota Pipe Line Company (MPL).
- Allow CWP to convert its existing Motley 34.5 kV distribution substation to operate at 115 kV due to the close proximity of the new 115 kV line to the existing substation.
- Prepare the transmission system for a future CWP distribution substation, which CWP anticipates needing in the Shamineau Lake area. This future substation could not be adequately served by the existing 34.5 kV transmission system in this area.

The Project will primarily be single circuit 115 kV transmission line with distribution underbuild in some areas. The enclosed project fact sheet includes more details on the project design.

If you would like to learn more about the project, a public open house meeting for the project will be held on:

**September 23, 2014, 4-7 p.m.**

at:

**Motley United Methodist Church  
847 3rd Avenue South  
Motley, Minnesota 56466**

The proposed transmission line will span several DNR public waters (see attached maps). Great River Energy will apply to the DNR Division of Lands and Minerals for a license to cross those waters.

The rare features identified in the project area are Northern Barrens Tiger Beetle, Red Shouldered Hawks, and beach heather (see attached maps). These features will be evaluated in detail once a route is permitted.

Great River Energy is requesting information on the possible effects of the proposed project on these features and other important natural resources that occur in the project area. Please advise if there is specific guidance relative to the rare features in the area.

We would appreciate receiving any written comments from your office by Friday, October 17, 2014.

If you have any questions about this proposed project, please contact me at (763) 445-5210. If you wish to respond by e-mail, my address is [MStrohfus@GREnergy.com](mailto:MStrohfus@GREnergy.com).

Thank you for your attention to this important project.

Sincerely,  
GREAT RIVER ENERGY



Mark Strohfus  
Environmental Project Lead

Enclosures: Fact Sheet/Project Map, PWI Maps, Rare Features Map -

S:\Legal\Environmental\Transmission\Projects\202972 Motley\Agencies\DNR\DNR Ltr - Motley.docx

# Motley Area 115 kV Transmission Project



Great River Energy  
12300 Elm Creek Blvd  
Maple Grove, MN 55369  
1-888-621-0130  
www.greatriverenergy.com



Crow Wing Power  
PO Box 507  
Brainerd, MN 56401  
1-800-648-9401  
www.cwpower.com

## Project Need

Great River Energy proposes to build and operate approximately 14 miles of new 115 kilovolt (kV) overhead transmission line in southern Cass County, eastern Todd County, and northern Morrison County to ensure the reliability of electric service to the members of Crow Wing Power (CWP). The project would:

- Strengthen the electric transmission system in the Motley area, as the existing 34.5 kV system serving the area is becoming outdated and is reaching its maximum capacity.
- Provide electric service to the proposed new CWP Fish Trap Lake distribution substation that would provide electric power to a new pipeline pumping station proposed by Minnesota Pipe Line Company (MPL).
- Allow CWP to convert its existing Motley 34.5 kV distribution substation to operate at 115 kV due to the close proximity of the new 115 kV line to the existing substation.
- Prepare the transmission system for a future CWP distribution substation, which CWP anticipates needing in the Shamaineau Lake area. This future substation could not be adequately served by the existing 34.5 kV transmission system in this area.

As a component of this project, additional circuit breakers will be added to the existing Dog Lake Substation along with 16 miles of new 115 kV transmission line for system reliability.

## Project Description

The proposed project (see back for a map of the preliminary transmission line route) would connect to the existing Minnesota Power 115 kV "24" transmission line at Cass County Road 35, approximately 1-3/4 miles north of Highway 210. At this location Great River Energy would install a three-way switch structure. From the switch structure, the new 115 kV overhead transmission line would extend southerly approximately 14 miles to serve the new CWP Fish Trap Lake distribution substation on MPL's pipeline pumping station property at U.S. Hwy. 10 and Holt Road. The new transmission line would require a 100-foot-wide right of way, 50 feet on each side of the centerline. Some segments of the transmission line would carry lower-voltage distribution lines as underbuild. In most cases, single round wood poles ranging in height from 60 - 90 feet above ground would be used (see photo at right). The typical distance between poles would range from 250 - 400 feet.



Typical 115 kV Wood Transmission Line Structure

## Permitting

The Minnesota Public Utilities Commission (Commission) must issue a Certificate of Need (CON) and a Route Permit before the project can proceed. Great River Energy will submit a combined CON/Route Permit application containing relevant information that will help the Commission determine if there is sufficient need for the project and evaluate the proposed route and any alternative routes brought forth by the public. At the conclusion of the permitting process, the Commission will determine the final location of the proposed transmission facilities.

The public and regulatory agencies will have numerous opportunities to provide input during the CON and Route Permitting process, which is conducted and facilitated by Commission and Minnesota Department of Commerce (DOC) staff. Public meetings will be held and other opportunities will be provided for collecting comments and responses. The DOC will prepare an Environmental Assessment document for the project.

## Tree Removal

Removal of trees and certain vegetation along the transmission line right-of-way will be necessary for safety, construction and maintenance purposes. Landowners will be contacted prior to tree removal activities.

## Project Schedule

Project notification and open house	Fall 2014
Permitting	Late 2014 - late 2015
Easement acquisition	2016
Transmission line design	2016
Environmental permits	2016
Transmission line construction	2017
Vegetation management	Late 2017

**For project updates and information, visit [greatriverenergy.com/Motley](http://greatriverenergy.com/Motley) or contact:**

Rick Heuring  
Sr. Field Representative  
Great River Energy - Land Rights Department  
(763) 445-6979  
rheuring@greenergy.com

Mark Strohlus  
Environmental Project Lead  
Great River Energy - Environmental Services Department  
763-445-6210  
mstrohlus@greenergy.com

Date last revised: 8/20/2014

# Preliminary Project Study Area



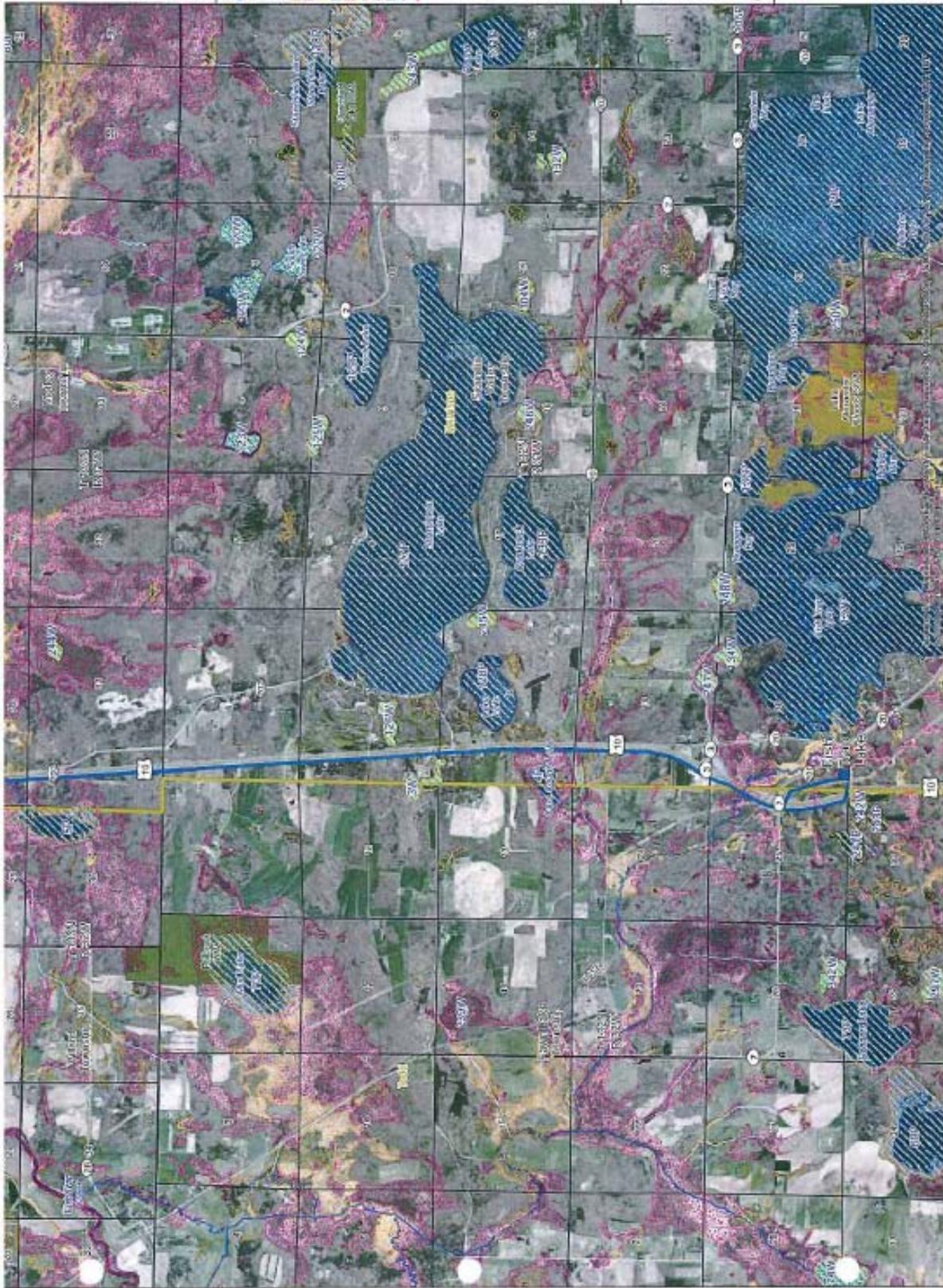




**GREAT RIVER ENERGY**

A Tallgrass Energy Company

- Proposed Project
- 115 kV Transmission Line
- Proposed Substation
- Distribution Substation
- Wetlands
- Proposed Emergent Wetland
- Proposed Forested Wetland
- Proposed Pond
- Wetlands
- Public Water Inventory (PWI)
- Public Water Wetland
- Public Water Basin
- Public Water
- Public Water
- Public Water



Update: 01/15/2014

Data Sources: Very Incentive  
MWDOT, AWDMS, MNGCD  
and Great River File-Bit

Area: Highways, Water  
ESRI, ESRI, ESRI  
Basemap: ArcGIS

Map Projection:  
UTM, NAD83, Zone 15, Meters

Scale:  
0 2,000 4,000 Feet

North Arrow

Motley Area  
115 kV Project  
Map 2 of 2

Wetlands and  
Hydrologic Features





## Strohfus, Mark GRE-MG

---

**From:** Joyal, Lisa (DNR) [Lisa.Joyal@state.mn.us]  
**Sent:** Monday, September 22, 2014 4:39 PM  
**To:** Strohfus, Mark GRE-MG  
**Subject:** Motley Area 115 kV Transmission  
**Attachments:** 2012 NHIS Form and Instructions.pdf

Hi Mark,

I received the information that you sent regarding the above project. If you would like me to review the project for potential impacts to rare features, please submit the attached form. There is a fee for this service (typically \$100-\$150). Alternatively, you can conduct your own assessment of potential impacts and send it to me for concurrence. Please note that I am not concurring on the list of rare features in the area but rather on the potential effects to these rare features. If I need to spend a lot of time responding to your assessment then there may be a fee as well.

Thank you,

*Lisa Joyal*

---

Lisa Joyal  
Endangered Species Review Coordinator  
NHIS Data Distribution Coordinator  
Division of Ecological and Water Resources  
Minnesota Department of Natural Resources  
100 Lafayette Road, Box 25  
St. Paul, MN 55155

phone: 651-259-5109  
[lisa.joyal@state.mn.us](mailto:lisa.joyal@state.mn.us)  
[www.mndnr.gov/eco](http://www.mndnr.gov/eco)

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

September 16, 2014

Ms. Sarah Beimers, Manager  
Government Programs and Compliance  
Minnesota State Historic Preservation Office  
345 Kellogg Boulevard West  
St. Paul, MN 55102-1906

**RE: Proposed Motley Area 115 kV Transmission Project  
Morrison, Cass and Todd Counties**

Dear Ms. Beimers:

Great River Energy is currently gathering data to be used in preparation of regulatory applications necessary to obtain approvals and permits for the construction of the proposed Motley Area 115 kilovolt (kV) Transmission Project in Morrison, Cass and Todd counties (see enclosed fact sheet and map). Great River Energy and Minnesota Power intend to seek a Certificate of Need and a Route Permit for the Project from the Minnesota Public Utilities Commission (Commission).

The proposed electric transmission improvement project in the Motley area will serve four primary purposes:

- Strengthen the electric transmission system in the Motley area, as the existing 34.5 kV system serving the area is becoming outdated and is reaching its maximum capacity.
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The Project will primarily be single circuit 115 kV transmission line with distribution underbuild in some areas. The enclosed project fact sheet includes more details on the project design.

Ms. Sarah Beimers  
September 16, 2014  
Page 2

If you would like to learn more about the project, a public open house meeting for the project will be held on:

**September 23, 2014, 4-7 p.m.**

at:

**Motley United Methodist Church  
847 3rd Avenue South  
Motley, Minnesota 56466**

The project may require a Section 404 permit from the US Army Corps of Engineers (COE). If a permit is required, we understand the COE will initiate the Section 106 requirements and consult with the SHPO under your joint Programmatic Agreement. As a preliminary step, we will have Merjent complete a Cultural Resource Literature Review of the project area.

We would appreciate receiving any written comments from your office by Friday, October 17, 2014.

If you have any questions about this proposed project, please contact me at (763) 445-5210. If you wish to respond by e-mail, my address is [MStrohfus@GREnergy.com](mailto:MStrohfus@GREnergy.com).

Thank you for your attention to this important project.

Sincerely,  
GREAT RIVER ENERGY



Mark Strohfus  
Environmental Project Lead

Enclosures: Fact Sheet/Project Map

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# Motley Area 115 kV Transmission Project



Great River Energy  
12300 Elm Creek Blvd  
Maple Grove, MN 55369  
1-888-521-0130  
www.greatriverenergy.com



Crow Wing Power  
PO Box 507  
Brainerd, MN 56401  
1-800-648-9401  
www.cwppower.com

## Project Need

Great River Energy proposes to build and operate approximately 14 miles of new 115 kilovolt (kV) overhead transmission line in southern Cass County, eastern Todd County, and northern Morrison County to ensure the reliability of electric service to the members of Crow Wing Power (CWP). The project would:

- Strengthen the electric transmission system in the Motley area, as the existing 34.5 kV system serving the area is becoming **outdated and is reaching its maximum capacity**.
- Provide electric service to the proposed new CWP Fish Trap Lake distribution substation that would provide electric power to a new pipeline pumping station proposed by Minnesota Pipe Line Company (MPL).
- Allow CWP to convert its existing Motley 34.5 kV distribution substation to operate at 115 kV due to the close proximity of the new 115 kV line to the existing substation.
- Prepare the transmission system for a future CWP distribution substation, which CWP anticipates needing in the Shambeau Lake area. This future substation could not be adequately served by the existing 34.5 kV transmission system in this area.

As a component of this project, additional circuit breakers will be added to the existing Dog Lake Substation along with ½ mile of new 115 kV transmission line for system reliability.

## Project Description

The proposed project (see back for a map of the preliminary transmission line route) would connect to the existing Minnesota Power 115 kV "24" transmission line at Cass County Road 35, approximately 1-3/4 miles north of Highway 210. At this location Great River Energy would install a three-way switch structure. From the switch structure, the new 115 kV overhead transmission line would extend southerly approximately 14 miles to serve the new CWP Fish Trap Lake distribution substation on MPL's pipeline pumping station property at U.S. Hwy. 10 and Holt Road. The new transmission line would require a 100-foot-wide right of way, 50 feet on each side of the centerline. Some segments of the transmission line would carry lower-voltage distribution lines as underbuild. In most cases, single round wood poles ranging in height from 60 - 90 feet above ground would be used (see photo at right). The typical distance between poles would range from 250 - 400 feet.



Typical 115 kV Wood Transmission Line Structure

## Permitting

The Minnesota Public Utilities Commission (Commission) must issue a Certificate of Need (CON) and a Route Permit before the project can proceed. Great River Energy will submit a combined CON/Route Permit application containing relevant information that will help the Commission determine if there is sufficient need for the project and evaluate the proposed route and any alternative routes brought forth by the public. At the conclusion of the permitting process, the Commission will determine the final location of the proposed transmission facilities.

The public and regulatory agencies will have numerous opportunities to provide input during the CON and Route Permitting process, which is conducted and facilitated by Commission and Minnesota Department of Commerce (DOC) staff. Public meetings will be held and other opportunities will be provided for collecting comments and responses. The DOC will prepare an Environmental Assessment document for the project.

## Tree Removal

Removal of trees and certain vegetation along the transmission line right-of-way will be necessary for safety, construction and maintenance purposes. Landowners will be contacted prior to tree removal activities.

## Project Schedule

Project notification and open house	Fall 2014
Permitting	Late 2014 – late 2015
Easement acquisition	2016
Transmission line design	2016
Environmental permits	2016
Transmission line construction	2017
Vegetation	Late 2017

**For project updates and information, visit [greatriverenergy.com/Motley](http://greatriverenergy.com/Motley) or contact:**

Rick Heuring  
Sr. Field Representative  
Great River Energy - Land Rights Department  
(763) 445-5979  
rheuring@greenergy.com

Mark Strohus  
Environmental Project Lead  
Great River Energy - Environmental Services Department  
763-445-5210  
mstrohus@greenergy.com

Date last revised: 5/25/2014

# Preliminary Project Study Area



RECEIVED OCT 17 2014



Using the Power of History to Transform Lives  
PRESERVING • SHARING • CONNECTING

October 16, 2014

Mark Strohfus  
Great River Energy  
12300 Elm Creek Blvd.  
Maple Grove, MN 55369-4718

RE: Motley Area 115 kV Transmission Line Project  
Morrison, Cass, and Todd Counties  
SHPO Number: 2015-0009

Dear Mr. Strohfus:

Thank you for the opportunity to comment on the above project. It is being reviewed pursuant to the responsibilities given to the Minnesota Historical Society by the Minnesota Historic Sites Act and the Minnesota Field Archaeology Act.

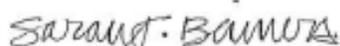
Due to the nature and location of the proposed project, we recommend that a Phase I archaeological survey be completed. The survey must meet the requirements of the Secretary of the Interior's Standards for Identification and Evaluation, and should include an evaluation of National Register eligibility for any properties that are identified. For a list of consultants who have expressed an interest in undertaking such surveys, please visit the website [preservationdirectory.mnhs.org](http://preservationdirectory.mnhs.org), and select "Archaeologists" in the "Search by Specialties" box.

We will reconsider the need for survey if the project area can be documented as previously surveyed or disturbed. Any previous survey work must meet contemporary standards. **Note:** plowed areas and right-of-way are not automatically considered disturbed. Archaeological sites can remain intact beneath the plow zone and in undisturbed portions of the right-of-way.

Please note that this comment letter does not address the requirements of Section 106 of the National Historic Preservation Act of 1966 and 36CFR800, procedures of the Advisory Council on Historic Preservation for the protection of historic properties. If this project is considered for federal assistance, or requires a federal license or permit, it should be submitted to our office by the responsible federal agency.

If you have any questions regarding our review of this project, please contact Kelly Gragg-Johnson at (651) 259-3455.

Sincerely,



Sarah J. Beimers, Manager  
Government Programs and Compliance

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January 27, 2015

Mark Strohfus  
Environmental Project Lead  
Great River Energy  
12300 Elm Creek Boulevard  
Maple Grove, MN 55369-4718

**Re: Phase IA Cultural Resources Assessment of the proposed Motley Area 115 kV Transmission Project, East and West Options, Cass, Todd, and Morrison Counties.**

Dear Mark:

Merjent was contacted in September 2014 by Great River Energy to conduct a Phase IA Cultural Resources Assessment in support of the proposed **Motley Area 115 kV Transmission Project (Project), Cass, Todd, and Morrison Counties**, Minnesota. Merjent completed a Phase IA Cultural Resources Assessment and provided a report dated September 19, 2014. Merjent was contacted again in January 2015 by Great River Energy requesting an expanded Phase IA on a newly identified route option. This report addresses the entire proposed Project including the original route identified in September (the West Route Option) and the subsequently identified route (the East Route Option).

The proposed Project will upgrade existing infrastructure in the vicinity of the existing Dog Lake Substation; strengthen the electric transmission system in the Motley area by upgrading the existing 34.5 kilovolt ( kV) system to 115 kV; provide electric service to the proposed new Crow Wing Power Fish Trap Lake distribution substation; support the ability of Crow Wing Power to convert its existing Motley 34.5 kV distribution substation to operate at 115 kV; and prepare the local transmission system for a future Crow Wing Power distribution substation in the Shamineau Lake area.

**Project Description:**

The Project would consist of:

- Construction of a 115kV transmission line to connect the existing Minnesota Power 115 kV “24” (MP 24) transmission line to the existing Motley Substation. The connection point of the proposed 115 kV line to the existing Minnesota Power line will be established on one of two potential locations:
  - The west option would consist of 3.8 miles of new overhead 115 kV transmission line extending northerly from the Motley Distribution Substation to an intersection with MP 24.
  - The east option would consist of 4.8 miles of new overhead 115 kV transmission line extending east from the Motley Distribution Substation one mile then extending northerly to an intersection with MP 24.

- From the Motley Substation, the new 115 kV overhead transmission line would continue westerly approximately 3.3 miles and then southerly approximately 7.2 miles to serve the new CWP Fish Trap Lake distribution substation, which is proposed to be constructed on Minnesota Pipe Lines (MPL) pipeline pump station property located at U.S. Hwy. 10 and Holt Road.
- The new transmission line would require a 100-foot-wide right of way, 50 feet on each side of the centerline. Some segments of the transmission line would carry lower-voltage distribution lines as underbuild.
- In most cases, single round wood poles ranging in height from 60 - 90 feet above ground would be used. The typical distance between poles would range from 250 - 400 feet.
- A corollary component of this Project is the placement of additional circuit breakers to Minnesota Power's existing Dog Lake Substation, requiring construction of approximately 0.5 miles of new 115 kV transmission line for system reliability.

Proposed Project activities may occur in the following counties and legal locations, which, in addition to a one mile buffer, served as the Phase IA study area:

County	Township	Range	Sections
Cass	134N	32W	26-27, 34-35
Cass	133N	31W	2-4, 9-11, 14-16, 21-23
Morrison	133N	31W	19-22, 26-31
Morrison	132N	31W	6-7, 18-19, 30-31
Todd	132N	32W	25, 36

#### Literature Review:

The main objective in reviewing the cultural resources literature is to identify the recorded cultural sites and assess the potential for unrecorded sites within the study area. The standard for considering a cultural property as significant is whether it meets the criteria for listing on the National Register of Historic Places (NRHP). The initial criterion for such listing is an age of 50 or more years. Beyond age, a property must retain integrity and be associated with significant historic trends, historic persons, building styles and craftsmanship, or the property must have the potential to provide significant information about the past.

Merjent reviewed and followed the published guidelines for conducting cultural resources literature reviews in Minnesota. The Minnesota State Historic Preservation Office (SHPO), located in the Minnesota History Center in St. Paul, maintains the state's prehistoric and historic archaeological site files, historic standing structure inventory files, and field survey reports. In September 2014 and January 2015 Merjent Cultural Resource Specialists Dan Born and Dean Sather examined site files maintained at SHPO.

#### Previously Recorded Archaeological Resources

Merjent identified 24 previously recorded archaeological sites within one mile of the study area. Many of the sites are associated with the Crow Wing River. The proposed transmission line would cross the Crow Wing River via either the West Route Option or the East Route Option.

Site Number/Site Name/Site Type	County, Location (T/R/S)	Site Significance	Location to Project
21CA0239/John and Lina Nygren Farm, a.k.a. Deer Site East/Pre-contact Lithic Scatter and Historic Foundations	Cass, 133N/31W/26	Unevaluated	Southeast of East Route Option
21CA0240/Deer Site West/ Pre-contact Lithic Scatter and Historic Artifact Scatter	Cass, 133N/31W/26	Unevaluated	Southeast of East Route Option
21CA0241/Fisherman's Pines/Pre-contact Artifact Scatter	Cass, 133N/31W/26	Unevaluated	East of East Route Option
21CA0242/Access Ford/Pre-contact Lithic Scatter	Cass, 133N/31W/23	Unevaluated	East of East Route Option
21CA0243/Turn-Around/Pre-contact Artifact Scatter	Cass, 133N/31W/23	Unevaluated	East of East Route Option
21CA0244/Lot 3, Wheelock Shores/Pre-contact artifact scatter	Cass, 133N/31W/22	Unknown	North and West of East Route Option
21CA0245/Lot 7, Wheelock Shores/Pre-contact lithic scatter	Cass, 133N/31W/22	Unknown	North and West of East Route Option
21CA0246/Siesta Islands/Pre-contact lithic scatter, earthworks	Cass, 133N/31W/22	Unknown	Between West and East Route Options
21CA0247/Donahue Find Spot II/Pre-contact single artifact	Cass, 133N/31W/21	Unknown	West Route Option may intersect
21CA0248/Creek Crossing/Pre-contact lithic scatter	Cass, 133N/31W/21	Unknown	West of West Route Option
21CA0249/Belden/Pre-contact lithic scatter	Cass, 133N/31W/21	Unknown	West of West Route Option
21MO0013/Morey/Pre-contact artifact scatter, earthworks	Morrison, 133N/31W/20	Unknown	North of project
21MO0015/Steinbrecher/Pre-contact Lithic Scatter and Historic Artifact Scatter	Morrison, 133N/31W/20	Unknown	North and West of Project
21MO0104/unnamed/Earthwork	Morrison, 133N/31W/20	Unknown	North and West of Project
21MO0129/Twin Pines/Pre-contact lithic scatter	Morrison, 133N/31W/21	Unknown	West of West Route Option
21MO0130/Pre-contact single artifact	Morrison, 133N/31W/21	Unknown	West of West Route Option
21MO0131/Peterson/Pre-contact artifact scatter	Morrison, 133N/31W/21&22	Unknown	East of West Route Option
21MO0132/Brad Macheel/Pre-contact lithic scatter	Morrison, 133N/31W/22	Unknown	East of West Route Option
21MO0133/Shay's Camp/Pre-contact and historic-period artifact scatters	Morrison, 133N/31W/22	Unknown	North and West of East Route Option
21MO0134/Pepin Point/Pre-contact Artifact Scatter	Morrison, 133N/31W/26	Unknown	Southeast of East Route Option
21MO0135/Rohl/Pre-contact Lithic Scatter	Morrison, 133N/31W/26	Unknown	Southeast of East Route Option
21MO0136/unnamed/Pre-contact Lithic Scatter	Morrison, 133N/31W/26	Unknown	North of proposed Fish Trap Lake Substation
21MOw/Historic-period structural ruin	Morrison, 133N/31W/21	Unknown	North of proposed Fish Trap Lake Substation
21TO0031/unnamed/Pre-contact Lithic Find Spot	Todd, 132N/32W/25	Ineligible	North of proposed Fish Trap Lake Substation

Eleven of the archaeological sites are in Cass County. Twelve of the archaeological sites are in Morrison County, and one is in Todd County. Twenty sites are situated along the river within Sections 21, 22, 23 and 26, in both Cass and Morrison counties on either side of the Crow Wing River. The West Route Option of the Project may intersect one of these sites (21CA0247) or be very near its recorded location.

The available information suggests that the locales crossed by the proposed Project, in particular the crossing options of the Crow Wing River, have a high potential to intersect currently non-recorded pre-contact archaeological sites, including artifact scatters and earthworks. Such resources are general considered to have a greater potential to be significant; in addition, pre-contact earthworks are almost always protected under the Minnesota Private Cemeteries Act (MN 307.08). Extant sites are also more likely in areas not disturbed by historic and modern (non-agricultural) development.

### Previously Recorded Standing Historic Structures

Merjent identified 4 previously recorded historic structures in the study area.

Site Number/Site Name/Site Type	County, Location (TRS)	Site Significance	Likely Location to Project
CA-MAY-002/Fort Ripley Military Road	Cass, 133N/31W/24	Unevaluated	East of Project
CA-MAY-003/Fort Ripley Military Road	Cass, 133N/31W/23	Ineligible	East of Project
MO-MOT-001/District 120 School, Motley Town Hall	Morrison, 133N/31W/22	Unknown	Project may intersect
TO-FAW-005/Northern Pacific Railway	Todd, 132N/32W/25	Ineligible	West of Project

The military road features in Cass County were inventoried in 1991 in concert with the documentation of multiple military road properties. While site CA-MAY-002 has not been evaluated for National Register eligibility, site CA-AY-003 has been recommended as ineligible. Neither of these sites will be impacted by the Project.

Structure MO-MOT-001 is the District 120 School House and Motley Town Hall building. This structure was inventoried during a 1985 county survey. Its current status is not clear but has likely not been evaluated for National Register eligibility. While proximal to the Project, it is located in a segment of the Project area containing existing transmission infrastructure. It is unlikely that the Project would significantly impact the site.

Structure TO-FAW-005 consists of a portion of the Northern Pacific Railroad. This structure was inventoried during a 2002 survey. It has been recommended as ineligible for the National Register. Because it is unlikely that other structures in the vicinity have become notable since that time, additional inventory along the Project alignment is not warranted.

### Conclusions

Merjent recommends that there may be adverse impacts on known or suspected cultural resources as a result of this Project. Merjent recommends that Great River Energy sponsor a Phase I Archaeological Reconnaissance Survey to locate previously recorded archaeological sites and identify significant sites

heretofore unknown, as well as any protected under MN 307.08 that could represent a delay to the project permitting or construction schedule. This inventory should include enough information to support site-specific significance assessments and inform location-specific routing decisions. Merjent believes that SHPO will share this opinion given the relatively high archaeological site density in the vicinity, particularly in the vicinity of the Crow Wing River.

Given public and private development over the 30-year period since the 1985 survey, it is unlikely that additional historic structures would be identified. In addition, if the known structure was truly significant, it is likely that previous public and private developers over the past 30 years would have been tasked with evaluating the potential adverse effects of their projects. Merjent recommends that no architectural review is appropriate for this Project.

Merjent recommends that if construction plans are altered to affect areas that were not previously surveyed or disturbed, these locations should be examined for cultural resources. Further, if human remains are encountered during construction activities, all ground disturbing activity must cease and local law enforcement must be notified per MN 307.08.

Please contact me at 612.924.3984 if you have questions.

Sincerely,  
Merjent, Inc.



Dean T. Sather, MA, RPA  
Sr. Cultural Resource Specialist





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

September 16, 2014

Mr. Andrew Horton, Habitat Conservation Biologist  
United States Department of the Interior  
Fish and Wildlife Service  
Twin Cities Field Office  
4101 American Blvd. East  
Bloomington, MN 55425-1665

**RE: Proposed Motley Area 115 kV Transmission Project  
Cass, Todd and Morrison Counties**

Dear Mr. Horton:

Great River Energy is currently gathering data to be used in preparation of regulatory applications necessary to obtain approvals and permits for the construction of the proposed Motley Area 115 kilovolt (kV) Transmission Project in Cass, Todd and Morrison counties (see enclosed fact sheet and map). Great River Energy and Minnesota Power intend to seek a Certificate of Need and a Route Permit for the Project from the Minnesota Public Utilities Commission (Commission).

The proposed electric transmission improvement project in the Motley area will serve four primary purposes:

- Strengthen the electric transmission system in the Motley area, as the existing 34.5 kV system serving the area is becoming outdated and is reaching its maximum capacity.
- Provide electric service to the proposed new Crow Wing Power (CWP) Fish Trap Lake distribution substation that would provide electric power to a new pipeline pumping station proposed by Minnesota Pipe Line Company (MPL).
- Allow CWP to convert its existing Motley 34.5 kV distribution substation to operate at 115 kV due to the close proximity of the new 115 kV line to the existing substation.
- Prepare the transmission system for a future CWP distribution substation, which CWP anticipates needing in the Shamineau Lake area. This future substation could not be adequately served by the existing 34.5 kV transmission system in this area.

The Project will primarily be single circuit 115 kV transmission line with distribution underbuild in some areas. The enclosed project fact sheet includes more details on the project design.

If you would like to learn more about the project, a public open house meeting for the project will be held on:

**September 23, 2014, 4-7 p.m.**

at:

**Motley United Methodist Church  
847 3rd Avenue South  
Motley, Minnesota**

The Fish and Wildlife Service website list for threatened and endangered species identifies the Canada Lynx (threatened) in Cass county and the Northern long-eared bat (proposed as endangered) in all three counties. These species will be evaluated further once a route is permitted, but we do not anticipate impacts to these species from construction of the project. If the Northern long-eared bat is listed, guidance associated with the bat will be considered.

The DNR Rare features database indicates the presence of the Northern Barrens Tiger Beetle, Red Shouldered Hawks, and beach heather in the project area (see attached maps). These species will be evaluated further once a route is permitted, but we do not anticipate impacts to these species from construction of the project.

Great River Energy is requesting concurrence or information on the possible effects of the proposed project on any listed or proposed threatened or endangered species and designated or proposed critical habitat that may be present in the project area.

We would appreciate receiving any written comments from your office by October 14, 2014. If you have any questions about this proposed project, please contact me at (763) 445-5210. If you wish to respond by e-mail, my address is MStrohfus@GREnergy.com. Thank you for your attention to this important project.

Sincerely,

GREAT RIVER ENERGY



Mark Strohfus  
Environmental Project Lead

Enclosures: Fact Sheet/Project Map, Rare Features Maps

# Preliminary Project Study Area



# Motley Area 115 kV Transmission Project



Great River Energy  
12300 Elm Creek Blvd  
Maple Grove, MN 55369  
1-888-521-0130  
www.greatriverenergy.com



Crow Wing Power  
PO Box 507  
Brainerd, MN 55401  
1-800-648-9401  
www.cwpower.com

## Project Need

Great River Energy proposes to build and operate approximately 14 miles of new 115 kilovolt (kV) overhead transmission line in southern Cass County, eastern Todd County, and northern Morrison County to ensure the reliability of electric service to the members of Crow Wing Power (CWP). The project would:

- Strengthen the electric transmission system in the Motley area, as the existing 34.5 kV system serving the area is becoming outdated and is reaching its maximum capacity.
- Provide electric service to the proposed new CWP Fish Trap Lake distribution substation that would provide electric power to a new pipeline pumping station proposed by Minnesota Pipe Line Company (MPL).
- Allow CWP to convert its existing Motley 34.5 kV distribution substation to operate at 115 kV due to the close proximity of the new 115 kV line to the existing substation.
- Prepare the transmission system for a future CWP distribution substation, which CWP anticipates needing in the Shaminnau Lake area. This future substation could not be adequately served by the existing 34.5 kV transmission system in this area.

As a component of this project, additional circuit breakers will be added to the existing Dag Lake Substation along with 1/2 mile of new 115 kV transmission line for system reliability.

## Project Description

The proposed project (see back for a map of the preliminary transmission line route) would connect to the existing Minnesota Power 115 kV "24" transmission line at Cass County Road 35, approximately 1-3/4 miles north of Highway 210. At this location Great River Energy would install a three-way switch structure. From the switch structure, the new 115 kV overhead transmission line would extend southerly approximately 14 miles to serve the new CWP Fish Trap Lake distribution substation on MPL's pipeline pumping station property at U.S. Hwy. 10 and Holt Road. The new transmission line would require a 100-foot-wide right of way, 50 feet on each side of the centerline. Some segments of the transmission line would carry lower-voltage distribution lines as underbuild. In most cases, single round wood poles ranging in height from 60 - 90 feet above ground would be used (see photo at right). The typical distance between poles would range from 250 - 400 feet.



Typical 115 kV Wood Transmission Line Structure

## Permitting

The Minnesota Public Utilities Commission (Commission) must issue a Certificate of Need (CON) and a Route Permit before the project can proceed. Great River Energy will submit a combined CON/Route Permit application containing relevant information that will help the Commission determine if there is sufficient need for the project and evaluate the proposed route and any alternative routes brought forth by the public. At the conclusion of the permitting process, the Commission will determine the final location of the proposed transmission facilities.

The public and regulatory agencies will have numerous opportunities to provide input during the CON and Route Permitting process, which is conducted and facilitated by Commission and Minnesota Department of Commerce (DOC) staff. Public meetings will be held and other opportunities will be provided for collecting comments and responses. The DOC will prepare an Environmental Assessment document for the project.

## Tree Removal

Removal of trees and certain vegetation along the transmission line right-of-way will be necessary for safety, construction and maintenance purposes. Landowners will be contacted prior to tree removal activities.

## Project Schedule

Project notification and open house	Fall 2014
Permitting	Late 2014 - late 2015
Easement acquisition	2016
Transmission line design	2016
Environmental permits	2016
Transmission line construction	2017
nergization	Late 2017

**For project updates and information, visit [greatriverenergy.com/Motley](http://greatriverenergy.com/Motley) or contact:**

Rick Heuring  
Sr. Field Representative  
Great River Energy - Land Rights Department  
(763) 445-5979  
rheuring@greenergy.com

Mark Strohfus  
Environmental Project Lead  
Great River Energy - Environmental Services Department  
763-445-5210  
mstrohfus@greenergy.com

Date last revised: 8/28/2014





## Strohfus, Mark GRE-MG

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**From:** Horton, Andrew [andrew\_horton@fws.gov]  
**Sent:** Wednesday, October 15, 2014 11:35 AM  
**To:** Strohfus, Mark GRE-MG  
**Subject:** Motley Area 115 kV Transmission Project

Mr. Strohfus,

I have reviewed the proposed transmission line located in Cass, Morrison and Todd Counties, Minnesota. You have correctly identified the listed and proposed to be listed species in those counties, however, we have no known occurrence records in close proximity to the proposed action area. Summer roosting habitat may be present for the northern long-eared bat (*Myotis septentrionalis*) and if removal of suitable habitat is anticipated after final listing and between April 1 and September 30, consultation may be necessary.

If project plans change, additional information on listed or proposed species becomes available, or new species are listed that may be affected by the project, consultation should be reinitiated. This concludes our review of the proposed construction at the above location. If you have any further endangered species questions, please contact me at (612) 725-3548 x2208.

Andrew Horton  
Twin Cities Ecological Services Field Office  
U.S. Fish and Wildlife Service  
4101 American Blvd East  
Bloomington, MN 55425-1665  
(612) 725-3548 ext. 2208

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## Strohfus, Mark GRE-MG

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**From:** Strohfus, Mark GRE-MG  
**Sent:** Thursday, January 29, 2015 12:58 PM  
**To:** 'Horton, Andrew'  
**Subject:** RE: Motley Area 115 kV Transmission Project  
**Attachments:** MotleyArea115kVTransmissionProjectFactsheet\_20141110.pdf

Andrew,

I'm sending this email message to update you on the Motley 115 kV Project and to ask about your northern long-eared bat (NLEB) recommendations in light of the Jan 16, 2015 FR Notice.

Great River Energy has identified an additional route option to the project. The attached project Fact Sheet shows the location of the additional route option called the "East Option". This additional route option does not alter the counties from what was indicated in our initial letter of September 16, 2014. Therefore, it doesn't alter the threatened and endangered species (Canada lynx and proposed NLEB) within the project counties.

With regards to the NLEB, your message of October 15 (below) implies that consultation may be necessary if the project would involve tree clearing between April 1 and September 30. The USFWS's reopening of its proposed listing of the NLEB now proposes conservation plans the following conservation plans:

*For purposes of this proposed 4(d) rule, coordination with the local Service Ecological Services field office is recommended to determine whether specific locations fall within the WNS buffer zone. For more information about the current known extent of WNS and 150-mile (241-km) buffer, please see <http://www.fws.gov/midwest/endangered/mammals/nlba/>.*

### *Conservation measures*

*The Service proposes that take incidental to certain activities conducted in accordance with the following habitat conservation measures, as applicable, will not be prohibited (i.e., excepted from the prohibitions):*

- (i) Occur more than 0.25 mile (0.4 km) from a known, occupied hibernacula;*
- (ii) Avoid cutting or destroying known, occupied maternity roost trees during the pup season (June 1–July 31); and*
- (iii) Avoid clear cuts within 0.25 (0.4 km) mile of known, occupied maternity roost trees during the pup season (June 1–July 31).*

*Note that activities that may cause take of northern long-eared bat that do not use these conservation measures may still be done, but only after consultation with the Service. This means that, while the resulting take from such activities is not excepted by this rule, the take maybe authorized through other means provided in the Act (i.e., section 7 consultation or an incidental take permit).*

*For purposes of this proposed rule and the conservation measures listed above, coordination with the local Service Ecological Services field office is recommended to determine the specific locations of the "known hibernacula" and "known maternity roosts." These locations will be informed by records in each State's Natural Heritage database, Service records, other databases, or other survey efforts. Hibernacula are generally defined as locations where one or more northern long-eared bats have been detected during hibernation or outside during staging or swarming. Similarly, maternity roosts are generally defined through roost records in each State's*

*Natural Heritage database, Service records, other databases, or other survey efforts for northern long-eared bat or other bat species.*

Based on the proposed rule, we would work with you on the buffer zone determination. My rough estimates from the USFWS's online map shows the project somewhere around 150 miles from the northern MN border detection location.

If the Project were to be within the buffer zone, would you agree that restrictions on tree clearing April 1 - May 31 and August 1 – Sept 30 would no longer apply?

If the Project were to be fall outside the buffer zone and we are >0.25 mile from any know hibernacula or maternity roost trees, would you agree that the conservation plan suggests that there are no restrictions on tree clearing?

Do you have more information on known hibernacula or roost sites?

Feel free to call me if you'd like to discuss this further.

Thank You,  
**Mark Strohfus**  
**Environmental Project Lead**  
Great River Energy  
12300 Elm Creek Boulevard  
Maple Grove, MN 55369-4718  
Tel: 763-445-5210 | Cell: 612-961-9820  
MStrohfus@GREnergy.com

The project appears to be somewhere between 140 and 175 miles from the known listed

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**From:** Horton, Andrew [mailto:andrew\_horton@fws.gov]  
**Sent:** Wednesday, October 15, 2014 11:35 AM  
**To:** Strohfus, Mark GRE-MG  
**Subject:** Motley Area 115 kV Transmission Project

Mr. Strohfus,

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Andrew Horton  
Twin Cities Ecological Services Field Office