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Julie A. Smith  
Christopher Lawrence  
Office of Electricity Delivery and Energy Reliability  
Mail Code: OE-20  
United States Department of Energy  
1000 Independence Avenue, SW  
Washington, DC 20585

**RE: Minnesota Power's Comments  
Department of Energy – Improving Performance of Federal Permitting  
and Review of Infrastructure Projects  
Request for Information, 78 Fed. Reg. 53,436 (August 29, 2013)**

Dear Ms. Smith and Mr. Lawrence:

Minnesota Power hereby provides comments in response to the Department of Energy's ("DOE") Request for Information ("RFI") in the above-referenced Federal Register publication. Minnesota Power has been working closely with the DOE and other state and federal agencies in developing its Great Northern Transmission Line ("GNTL" or "Project") that will be a 500 kV transmission line between the province of Manitoba and Minnesota Power's service territory in northern Minnesota. Since this Project crosses an international border, a Presidential Permit will be required from the DOE.

Minnesota Power believes the process we have undertaken since January 2012 to actively develop the Project through extensive voluntary outreach, including numerous meetings with landowners, federal, state, and local agencies and other invited stakeholders such as tribal governments and non-governmental organizations is a great example of efforts already underway to improve the pre-application process. As discussed in the RFI, the DOE's draft Integrated, Interagency Preapplication ("IIP") Process may be a means "to improve the efficiency, effectiveness and predictability of transmission siting, permitting and

review processes, in part through increasing interagency coordination and transparency.” 78 Fed. Reg. 53,437.

As demonstrated below in describing the Project and the routing process, Minnesota Power believes a robust and flexible pre-application process is key to a successful project. Each transmission project is unique and will necessitate tailoring each pre-application process to the regulatory and geographic realities of each project. In particular, the GNTL highlights the need for close coordination between federal and state agencies and recognition that requirements and schedules may differ and that an agreed upon schedule is critical to facilitating timely review and approval by applicable agencies.

## **PROJECT OVERVIEW AND BENEFITS**

The Project includes high voltage connections between the province of Manitoba in Canada and the Blackberry Substation in Itasca County, Minnesota to enable additional deliveries from Manitoba Hydro to meet existing and future energy needs for Minnesota Power and its customers and for other utilities in the region. The Project brings a host of benefits, while enabling Minnesota Power to meet its customers’ need for power. Those benefits include, but are not limited to: enabling Minnesota Power to diversify its baseload generation portfolio and reduce the overall emissions associated with its electric supply portfolio; increasing transmission system reliability for a broad region of the upper Midwest as shown through regional reliability studies; and supporting recent and planned industrial growth on Minnesota’s Iron Range. In addition, the Project provides economic benefits in the form of property tax revenue, construction and maintenance jobs and increased business for hotels, restaurants, and other services along the final route.

Minnesota Power proposes to construct a 500 kV transmission line from the border that would terminate at the Blackberry Substation in Itasca County (approximately 225 to 300 miles). The Great Northern Transmission Line will provide delivery and access to power generated by Manitoba Hydro’s hydroelectric stations in Manitoba, Canada. Minnesota Power needs this line to deliver at least 250 MW of energy and capacity by June 1, 2020 under a Power Purchase Agreement (“PPA”) approved by the Minnesota Public Utilities Commission in MPUC Docket No. E-015/M-11-938. The Project is intended to facilitate increased imports from Manitoba of up to 750 MW to serve load in the upper Midwest and to support the regional transmission system. Of course, due to the interconnected nature of the regional electric grid, the line will transmit electricity generated

by a variety of sources. However, the primary effect of the Project will be to provide increased access to hydropower. Additionally, the Project facilitates an innovative wind storage provision in the PPA that leverages the flexible and responsive nature of hydropower to improve the value of Minnesota Power's significant wind energy investments.

## **VOLUNTARY STAKEHOLDER AND AGENCY OUTREACH**

To date, Minnesota Power has held four rounds of open house meetings in various locations around northern Minnesota. Local landowners, tribal governments and non-governmental organizations and other potential stakeholders were invited to attend. The first round of meetings, held in August 2012, was intended to discuss the Project, notify stakeholders early in the process and gather input from stakeholders to identify opportunities and constraints within a broad preliminary study area. The second round of meetings, held in October and November 2012, gathered input from the public to be considered when developing potential routes for the transmission line. Attendees were invited to learn about the Project, provide feedback, and speak with the Project team. The third round of open houses, held in April 2013, gathered input from the public to be considered when developing the proposed route alternatives for the transmission line. The fourth round of open houses, held in September 2013, requested specific feedback on specific route alternatives. Minnesota Power has also hosted online open houses at the Project website: <http://www.greatnortherntransmissionline.com>.

Minnesota Power has also been meeting with federal, state and local agency officials to begin to understand their environmental review requirements, permitting and potential mitigation strategies, and to discuss the Project's schedule and process as relevant to that agency. The table below lists the agencies that Minnesota Power met with between June 2012 and September 2013. An all agency meeting was held in December 2012 at the request of DOE to provide an update and to begin the inter-agency discussions for the Project. In all, 16 government agencies have attended at least one Project meeting. In addition, Minnesota Power has collaborated with agency officials about the routing process and the methods by which stakeholder and agency feedback would be incorporated into that process.

## Summary of Agency Meetings through September 2013

Agency	Meeting Date(s)
Advisory Council on Historic Preservation	December 11, 2012
MN Public Utilities Commission	June 6, 2012, December 11, 2012, and June 14, 2013
MN Department of Transportation	June 20, 2012 & December 11, 2012
MN Department of Natural Resources	June 26, 2012, December 11, 2012, March 21, 2013 and August 30, 2013
MN Department of Commerce	July 12, 2012, September 4, 2012, December 11, 2012, June 14, 2013 and September 16, 2013
MN Department of Agriculture	September 5, 2012
MN Pollution Control Agency	September 4, 2012
MN State Historic Preservation Office	October 2, 2012
US Department of Energy	December 11, 2012 and September 16-19, 2013
US Army Corps of Engineers	June 7 and December 11, 2012, April 22, August 8, 2013 and September 17, 2013
US Fish and Wildlife Service	June 20, 2012 and December 11, 2012
US Forest Service - Chippewa National Forest	October 30, 2012 and December 11, 2012
US Department of Agriculture – Natural Resources Conservation Services	December 11, 2012
US Environmental Protection Agency	December 11, 2012
US Bureau of Indian Affairs	October 2, 2012

### SUMMARY OF THE GNTL ROUTING PROCESS

In addition, Minnesota Power has collaborated with agency officials about the routing process and the methods by which stakeholder and agency feedback would be incorporated into that process. One of the important phases of development of the GNTL is routing of the transmission line. Minnesota Power has developed a routing process which allows it to offer early engagement consistent with federal guidance and the opportunity to evaluate possible routing options. The process is iterative and involves identification of a Study Area, corridors and potential route alternatives that incorporate stakeholder and agency feedback

from public outreach and agency meetings. Using the work performed during this process, Minnesota Power anticipates development of practicable route alternatives for submission to the agencies in the Presidential Permit and state route permit applications. Below is a high level summary description of the routing process to date.

**Study Area:** With input from the agencies and other stakeholders concerning the GNTL project, Minnesota Power developed a broad preliminary Study Area for the Project.

**Corridors:** Within the Study Area, Minnesota Power developed project corridors by considering a number of factors, including but not limited to:

- US/Canadian border
- Population density
- Protected natural and recreational areas
- Mining and industrial development
- Existing transmission lines and transportation corridors
- Unsuitable conditions for construction (poor soils, floodplains, etc.)
- Large bodies of water

Minnesota Power gathered input from public/stakeholder open houses and local, state, and federal agencies to identify areas of opportunities and areas of constraint within the Study Area. Examples of the opportunities and constraints criteria used to narrow down the Study Area to broad 10-20 mile corridors are below:

<b>Opportunities</b>	<b>Constraints</b>
<p><b>Infrastructure</b> Existing transmission lines, pipelines.</p>	<p><b>Land Use</b> Community &amp; industry development, public &amp; NGO lands, conservation areas, existing infrastructure.</p>
<p><b>Transportation</b> Roadways, railways.</p>	<p><b>Environmental</b> Species, habitat, &amp; natural resources, cultural, historical, &amp; visual resources.</p>
<p><b>Land division</b> Property lines, public land survey lines.</p>	<p><b>Engineering</b> Reliability, constructability (poor soils), cost.</p>

**Stakeholder and Agency Input:** One of the purposes of the open houses was to provide the landowners, tribal governments and non-governmental organizations, and the public with an opportunity to look at detailed maps of their area and provide feedback on the selection of potential routes. Minnesota Power refined the study corridors into broad route

alternatives based on engineering and regulatory guidelines, data analysis, and agency and stakeholder feedback. At this point, route alternatives are wider than the required right-of-way. The additional width allows the flexibility to make adjustments based on landowner, other stakeholder and agency feedback received on our website, via email, and at public and agency meetings.

At the Route Alternative public open house meetings, Minnesota Power collected hundreds of comments from the public, either directly during the meetings, or via on-line, phone calls, email or mail. These comments can generally be categorized into the following groups:

**Feature-specific:** These comments provide new or updated information on existing datasets. Example: unmapped home or airstrip.

**Location-specific:** These comments provide a broader scope of information for an area. Example: “wild rice patty farming area; aerial spraying is heavily used.”

**General:** These comments might reinforce best practices or may not be tied to a single area/attribute. Example: “Do not go diagonal through agricultural lands,” or, “Cultural resources related to the reservation generally located in this county.”

**Routing Criteria:** There tends to be fewer comments in this group but typically, these comments are in regards to contract-based land areas or other unique features that were not previously considered in the earlier routing analysis. These new routing criteria are added to our list and analyzed during future steps of the routing process. Example: state managed forest incentive act parcels.

Feature-specific and location-specific comments are entered into the Project’s GIS database. Each comment is given a category, such as; ‘Agriculture,’ ‘Natural Resources,’ or ‘Home/Structure,’ as well as a type: ‘Opportunity,’ ‘Constraint,’ ‘Both,’ or ‘Neither.’

During the subsequent routing process, Minnesota Power will consider these comments, along with any additional data collected, to more closely define and select the practicable route alternatives to be carried forward into the Presidential Permit and state route permit applications.

Minnesota Power looks forward to continuing the early engagement for the Great Northern Transmission Line project and welcomes further advancement of the DOE's integrated, inter-agency process.

Yours truly,

A handwritten signature in black ink that reads "David R. Moeller". The signature is written in a cursive, flowing style.

David R. Moeller