City of North Mankato
Memorandum

To: huntleywilmarth@xcelenergy.com
From: John D. Harrenstein, City Administrator
Subject: Alternative routes for Huntley Wilmarth proposal
Date: September 11, 2017

The purpose of this memo is to provide North Mankato’s response to the updated proposed routes associated with the Huntley Wilmarth 345 kilovolt transmission line project. The City received Xcel’s mailer regarding updates to the proposed routes. This mailer included two maps described as the “Belgrade Inset” and the “St. Clair Inset.” The “Belgrade Inset” has been added to a map prepared by the City as an attachment to this memo and is labeled “Xcel Energy Proposed Alternative Route – Sept 2017.”

As Xcel Energy and ITC were already informed, the City of North Mankato adopted Resolution 47-17 requesting XCEL remove seven segments from consideration prior to applying to the Minnesota Public Utilities Commission for a permit (see attached). Resolution 47-17 continues to be the City of North Mankato’s official position on the matter of the Huntley Wilmarth 345 kilovolt transmission line project.

In regards to the alternatives proposed by Xcel in the mailer received by the city and displayed on the attached map, the following observations can be informed by Resolution 47-17:

1. All of the alternatives utilize segment 20 and North Mankato has requested this segment be removed from any application to the Minnesota Public Utilities Commission.

2. Alternative 3&4 utilize segment 20 and will result in environmental, economic, and societal detriments to the future service areas of North Mankato. The City requests Xcel and ITC completely avoid these areas. All configurations of alternatives 3&4 are unacceptable to the City of North Mankato.

3. Alternative one continues to utilize segment 20 and avoids future service areas as requested by North Mankato. Concern regarding Alternative one is lessened because it moves westward before reaching the bluff abutting Judson Bottom road and does not ascend the bluff until it is west of the City’s future service areas identified on the map attached to this memo.

4. Alternative 2 is an extension of Alternative 1 (See comments above) and borders future service areas of the city.

Cc: North Mankato City Council
RESOLUTION REQUESTING XCEL ENERGY REMOVE SEGMENTS 20, 47, 48, 49, 50, 51, and 53 OF THE HUNTELEY-WILMARTH 345 KILOVOLT TRANSMISSION LINE PROJECT FROM ANY APPLICATION TO THE MINNESOTA PUBLIC UTILITIES COMMISSION

WHEREAS, Xcel Energy and ITC have proposed construction of a 345 Kilovolt Transmission line connecting the Huntley and Wilmarth Substations; and

WHEREAS, segments 20, 47, 48, 49, 50, 51, and 53 of the Huntley-Wilmarth 345 Kilovolt Transmission Line Project will negatively impact existing and future homeowners, the economy, the environment, and the quality of life in the City of North Mankato; and

WHEREAS, segments 20, 47, 48, 49, 50, 51, and 53 of the Huntley-Wilmarth 345 Kilovolt Transmission Line do not take into consideration the Future Land Use Map and Comprehensive Land Use Plan of the City of North Mankato provided to Xcel energy before the beginning of the public hearing process; and

WHEREAS, the City Council of North Mankato agrees an efficient energy grid system is important to its residents; and

WHEREAS an efficient energy grid can be achieved without segments 20, 47, 48, 49, 50, 51, and 53 being included in Xcel Energy’s application to the Minnesota Public Utilities Commission for the Huntley-Wilmarth 345 Kilovolt Transmission.

NOW, THEREFORE, BE IT RESOLVED BY THE COUNCIL OF THE CITY OF NORTH MANKATO, MINNESOTA:


Adopted by the City Council this 2nd day of August 2017.

Mayor

ATTEST:

City Clerk
City of North Mankato Meeting (8/21/17)

Attendees:

- City of North Mankato – John Harrenstein (City Administrator) Kevin McCann (City Finance Director)
- Utilities - Trisha Rosenfeld, Tom Hillstrom

Positions/Interests:

Xcel requested the meeting to discuss an upcoming mailing to inform landowners of new segments being considered west of Rockford Road.

Discussion topics:

We presented maps of new segments west of Rockford Road (three options) and a draft landowner mailing we plan to send. We indicated that we need to notify public that we are considering new segments. The purpose of adding these segments is to accommodate Pleasant View neighborhood, developer and City concerns by minimizing impacts to future development and increase the distance of the new route from the Pleasant View neighborhood.

City Feedback:

John referred to the City’s resolution and memo and expressed his opposition to the added segments. He understood our need to keep these segments in consideration at least until they are public presented and commented on. He particularly opposed routes within the City’s future development areas. He did not object to the draft mailing that was reviewed at the meeting.
Memorandum

To: huntleywilmarth@celenergy.com
From: John Harrenstein, North Mankato City Administrator
Subject: Huntley-Wilmarth 345 Kilovolt Transmission Line Project
Date: August 7, 2017

Background
The purpose of this memo is to outline concerns regarding segments 20, 47, 48, 49, 50, 51, and 53 of the Huntley-Wilmarth 345 Kilovolt Transmission Line Project proposed by Xcel Energy and ITC Midwest. The City of North Mankato agrees an efficient energy grid system is important and understands a new transmission line is needed to provide more low-cost electric generation to reach customers in our region. However, segments 20, 47, 48, 49, 50, 51, and 53 proposed as options for the route will impede existing, short-term, and long-term development in North Mankato’s growth areas as identified in the Comprehensive Land Use Plan adopted by the City Council and Planning Commission in 2015. Among Xcel’s proposed routes, there are a number of potential routes west of future planned service areas for development in North Mankato (see attached map) that accomplish the goal of bringing more low-cost energy to the region without impeding development in North Mankato. In addition, a number of easterly routes also exist with no impact to development. North Mankato specifically requests Xcel remove from consideration all proposals to the Minnesota Public Utilities Commission that include segments 20, 48, 49, 50, 51, and 53 of the Huntley-Wilmarth 345 Kilovolt Transmission Line Project and a failure to do so will result in the city exercising all legal means available to it to oppose construction of segments 20, 47, 48, 49, 50, 51, and 53 should they be submitted as part the application.

Overview of Concerns with Segments 20, 47, 48, 49, 50, 51, and 53 of the proposed route
Attachment A to this memo is a map titled, “Preliminary Route Concerns” that identifies portions of the Future Land Use map of the City of North Mankato adopted by the City Council and the Planning Commission in 2015. As demonstrated on the attachment, routes 20, 48, 49, 50, 51, and 53 traverse within 500 feet of existing development, less than 100 feet from future development, and will eliminate the marketability for future demand of housing in one of the two primary growth areas for housing in the community.

The map attached to this memo also identifies conflicts with existing and planned development in the North Ridge subdivision development. This area has been developing since the 1990’s and has been planned for future housing development. Of the proposed route options, specifically segments 20, 48, 50, 51, and 53 will impact existing homes, future homes, and curtail future growth of this area. As demonstrated on the map, this area is guided for future residential growth of North Mankato and is critical to the continued development of the municipality. Proposed segments 20 and 48 in this area do not follow an existing route of transmission. While proposed segment 53 does follow an existing route, the transmission line is
owned by the BENCO rural electric cooperative and currently is a single 7200 volt line that is planned to be buried when residential development reaches it.

The map attached to this memo also identifies an area of potential single family development on the southern boundary of the community. Specifically, proposed segments 48, 49, 50, and 51 will render this property undevelopable. These proposed segments do not follow an existing transmission route.

The map attached to this memo displays the impact of route 53 on the planned expansion of the North Port Industrial park. The City of North Mankato and the BENCO rural electric cooperative have partnered since 1991 on developing the North Port Industrial park. One 115 Kilovolt transmission line already traverses through portions of the park and proposed segment 53 will impede future economic development efforts the City has relied upon to diversify the property tax base to balance collections between homeowners and industrial users. This segment does also does not follow an existing transmission route.

Finally, the map attached to this memo displays a planned sanitary sewer service area identified as “industrial park lift station area” that will service industrial uses north of Highway 14 and residential uses south of the Highway 14. The area described as “Industrial park lift station area” is anticipated to be constructed in the next two years and any proposed route option should avoid this future service area.

**North Mankato’s recommendations for Huntley-Wilmarth 345 Kilovolt Line**

Following a discussion with city staff and landowners on July 19th, Xcel energy submitted a map and summary comments from the meeting to the City of North Mankato (attached). Included on the map is an alternative route represented with a blue line described as Xcel Energy Proposed Alternative Route. This route was submitted by a property owner at the open house meeting when asked to recommend a proposal at the meeting. The proposed route does not represent a recommendation of the City of North Mankato or reflect any discussion the City has had with Xcel or ITC Midwest. This alternative route does not meet the expectations of the City or the Comprehensive Land Use Plan adopted by the City Council and Planning Commission in 2015 as it still traverses future developable area in the proposed North Port Industrial Park as well as residential areas that will be serviced by City sewer following installation of the lift station west of Carlson Drive along Highway 14.

As mentioned above, any route west of planned service areas will avoid the concerns mentioned above or an easterly route that completely avoids the North Mankato will resolve any potential impact to the City. North Mankato recommends segments 20, 47, 48, 49, 50, 51, and 53 be removed from any application Xcel includes to the Minnesota Public Utilities Commission and that a more westerly or easterly route around the community be utilized that follows existing
transmission service to minimize the impact to society, environment, and future economic growth of the North Mankato community.

**Timeline of discussions with XCEL and ITC**

January 31st – North Mankato City Administrator and Community Development Director meet with Trisha Rosenfeld and Tim Carlsgaard regarding Xcel Energy’s proposed 40-50 mile 345 kilovolt transmission line from the Huntley substation to the Wilmarth substation. At the meeting, staff discussed the need to route a northern line away from the boundary of the city.

June 19th – Energy Presentation Trisha Rosenfeld and Tom Hillstrom from Xcel Energy appeared before Council and presented information concerning a joint project between Xcel and the Midcontinent Independent System Operator (MISO). The proposed project is the construction of a 345 KV Transmission Line to support a growing need for transmission of energy and enabling additional low-cost electric generation to reach customers. Ms. Rosenfeld indicated open houses would be conducted along with direct mailings informing customers in the affected area, which included North Mankato and Nicollet County, of the proposed line construction. Xcel wanted to inform the City before the open houses began. Included in the proposal are segments 20, 47, 48, 49, 50, 51, and 53.

June 21st – ITC Midwest and XCEL Energy host open house in Mankato regarding the proposed 345 KV Line. Several residents from North Mankato attend the open house and raise concerns about segment 53 of the proposed route.

July 6th – City Administrator places call to Tim Carlsgaard at Xcel to discuss the city’s opposition to segment 53 and requests the date of the application submission as well as the contact information for the decision make at Xcel regarding who will submit the proposal to the PUC. Specifically, North Mankato requested segment 53 be removed from the proposed options given to the PUC for consideration.

July 19th – City Administrator, Community Development Director, Bill Marks (property owner/developer), Steve & Kathleen Burnett (property/developer owner), Randy King (property owner/resident) met with Trisha Rosenfeld, Tom Hillstrom, Tim Carlsgaard, and Lori Broghammer (ITC) regarding the Huntley Wilmarth proposal. Specific concerns were discussed about Segments 20, 47, 48, 49, 50, 51, and 53. Specific questions were asked about the process and the decision making authority for the project. No concrete feedback was given to this group by Xcel other than they would take our comments under consideration and desired to continue the community conversation regarding this route.

August 7th – North Mankato City Council approved Resolution requesting segments 20, 47, 48, 49, 50, 51, and 53 be removed from any application to the Minnesota Public Utilities Commission.
Cc:

Tom Hillstrom, XCEL Energy
Tim Calsgaard, XCEL Energy
Lori Broghammer, ITC Midwest
Trisha Rosenfeld, Xcel Energy
Bill Marks, Property Owner
Randy King, North Mankato Resident
Steve Burnett, Property Owner
Bret Eknes, Public Utilities Commission
Dan Wolf, Public Utilities Commission
Deb Roby, Jennings Strouss
Preliminary Route Concerns
Hunley-Wilmart 345kV Transmission Preliminary Route Options

August, 2017

If A Western Route is Selected North Mankato Recommends A Transmission Route West of Planned Service Areas

Legend

Future Land Use (Adopted 3/2/2015)

- General Commercial
- Neighborhood Commercial
- Commercial/Industrial
- Mixed Use
- Heavy Industrial
- High Density Residential
- Medium Density Residential
- Low Density Residential
- Institutional
- Open Space/Park

Preliminary Route is Within 500' of Homes in Existing Development

Conflict with North Ridge Future Residential Development

Conflict with South Boundary Future Residential Development

Conflict with North Port Industrial Park Expansion
Future Development and Alternative Segments Discussed at 7/19/17 Meeting
City of North Mankato Meeting (7/19/17)

Attendees:

City of North Mankato – Mike Fischer (City Planner), John Harrenstein (City Administrator) Kevin McCann (City Finance Director)
Landowners - Randy King, (Pleasant View neighborhood spokesperson and resident); Bill Marks, (landowner/developer south of Pleasant View neighborhood) Steve and Kathy Burnett, (landowner and developer of land on both sides and north of Rockford Road) Shannon Gullickson (daughter of Steve and Kathy and resident on Rockford Road).
Attorneys - City attorney was on the phone for a short while at the beginning and Bill Mark’s attorney was on phone for a short while.
Utilities - Trisha Rosenfeld, Lori Broghammer, Tim Carlsgaard, Tom Hillstrom

Positions/Interests:

The City of North Mankato called the meeting with the specific purpose of requesting that Utilities remove segments along Rockford Road. City staff strongly supported all three landowners and recommended removing routes through both Mr. Burnett’s and Mr. Marks land.

Pleasant View Neighborhood - Randy indicated that the neighborhood was against the route along Rockford Road siting a broad consensus of the neighborhood that the lines would harm the neighborhood setting.

Burnett Family – Own much land along Rockford Road with plans to develop residential lots. They believe any routes through this land would make the development untenable. The Burnetts provided a map of a future development north of Hwy 14 and west of Rockford Road. They also described development all along Rockford Road from Hwy 14 to Judson Bottom Road. The Burnetts also indicated that they had provided an alternate route farther to the west of Rockford Road. This route was discussed and Utilities agreed to take another look at the route and possibly change it to avoid the waterfall park at Judson Bottom Road.

Mr. Marks – recently purchased land on bluff south of Pleasant View neighborhood. Two potential routes go through this land. Mr. Marks believed that either of these routes would make his development plans untenable.

A map of the two development areas and routes discussed is attached to this document.

Discussion topics:

Route selection Process – Utilities responded to questions about how routes were selected. Utilities explained Pre- application utility process of outreach, routing criteria and systematic comparison of options. We also explained Post – application MPUC/DOC process / intervention / open / contested case / PUC decision. Utilities committed to open communication as process proceeds.

Will we remove routes as City requested? – Utilities did not commit to removing any routes at this point explaining that all routes will be subject to a data comparison process. We listened to concerns and indicated that we will examine new routes farther to the west and would have to inform any newly affected landowners prior to making any route decisions. We offered to meet with City / landowners at any time as the process goes on.

Ongoing communication – Utilities indicated that we would keep all parties informed as we refine our routing options. We offered another meeting with the Pleasant view neighborhood but it was not considered necessary at this time.
City of North Mankato Meeting

When: 1/31/17 @ 9:30AM

Attendees

- Xcel Energy: Tom Hillstrom, Siting & Land Rights; Trisha Rosenfeld, Community Relations; Sarah Gedrose, Communications
- North Mankato: John Harrenstein, City Administrator; Michael Fischer, City Planner

Topic: Xcel Energy briefed officials on the upcoming Huntley-Wilmarth project and looked for feedback in routing options.

Notes

- The 115 kV line (blue line, east of Wilmarth Substation) area, just west of the MN River, is marked as a future residential area, along with the existing 345kV line north of the future city boundaries.
- Mike is sending their future land use map. They asked if we could plan the new line around the future city boundaries.
- N. Mankato asked if we could build on the existing 345 circuit. We said we were checking into it, but that it could affect reliability
- N. Mankato brought up the idea of going east around Mankato toward Eagle Lake
- We mentioned we need to refine State Park boundaries
- N. Mankato mentioned there is a middle school by a new highway extension and a new roadway planned in the area of Blue Earth County
- N. Mankato asked about health concerns of living near a power line. We explained that EMF is a common concern, but there are no scientific studies to prove adverse health effects.
- N. Mankato asked about how many lines (wires) would be on the 345 structures if we added another line, we explained that each circuit is made up of three conductors and that conductors can consist of multiple wires (2 or 3).
- N. Mankato said if possible they would rather have the new line go east to avoid their planned new development in the area. They said if we have to build a new 345 line, a possible option may be ¼ mile north of the existing 345kV line.
- N. Mankato asked about the economic effect of the proposed new line and if it would increase reliability and redundancy to any of the areas we serve in their community.
Belgrade Township
The meeting with the Belgrade Township Board took place at 2070 Howard Drive West in North Mankato on Tuesday, January 9, 2018 at 7pm. We were asked by the (now) Township Chair, Mary Milbrath, to attend the meeting to provide an update to the routing process.

Grant and I attended the meeting on behalf of the project team. Approximately 40 people were in attendance, including the board members. Our portion of the meeting lasted about one hour. Highlights of the comments and questions as they relate to the project are as follows:

- Watershed issues are a concern throughout the township. We mentioned we will need to do a SWWWW with the MPCA for the project.
- Property value decrease due to the new transmission line was a concern.
- Is this a money making project for the company?
- Ensure all public comments are included in the application.
- After route application is submitted, how are public comments submitted to the Company provided to the PUC?
- Provide comment cards at all public meetings for those that do not want to speak up. We did mention the website with the email address for comments to be submitted, however it was stated that some people don’t use email.
- EMF was a concern and was questioned. We indicated it is a factor used when the route is decided by the MPUC, but did not speak much about it.
- What will the electrical bills be when the project is assumed? What is the ROI?
- The Township board mentioned they would be okay with using the existing lines as the preferred location for the new line.
- The Township Board members prefer to see the eastern route, with an additional route along State Highway 22.
- The Township Board members said there will be many court battles if the route going through Belgrade Township is used.
- Mary Milbrath commented on EMF and CEDS (Community and Environmental Defense Services) on the east coast. She said they were a regulatory body that denied new transmission routes in the eastern states and asked why we don’t have that type of regulatory body here.
- It was important to everyone in attendance that they are notified of the route application submittal and where they can submit public comments. We mentioned there will be a mailing along with the project website clearly updated with this information for the MPUC.
RESOLUTION REQUESTING XCEL ENERGY TO REMOVE THE BELGRAD INSET OF THE HUNTLEY-WILMARTH 345 KILOVOLT TRANSMISSION LINE PROJECT FROM ANY APPLICATION TO THE MINNESOTA PUBLIC UTILITIES COMMISSION

WHEREAS, Xcel Energy and ITC have proposed construction of a 345 Kilovolt Transmission line connecting the Huntley and Wilmarth Substations; and

WHEREAS, the Belgrade Inset proposal of the Huntley-Wilmarth 345 Kilovolt Transmission Line Project will negatively impact existing homeowners and property owners along the proposed Belgrade Inset; and

WHEREAS, the Belgrade Inset proposal of the Huntley-Wilmarth 345 Kilovolt Transmission Line Project does not take into considerations the environmental and economic impacts in comparison to other possible routes; and

WHEREAS, the Belgrade Township agrees an efficient energy grid system is important to its constituents; and

WHEREAS, an efficient energy grid can be achieved without the addition or consideration of the Belgrade Inset being considered by Xcel Energy and should not be included into Xcel Energy’s application to the Minnesota Public Utilities Commission for the Huntley-Wilmarth 345 Kilovolt Transmission.

NOW, THEREFORE, BE IT RESOLVED BY THE BELGRADE TOWNSHIP BOARD:

1.) The Belgrade Township Board requests Xcel Energy, and ITC to re-evaluate its currently proposed Belgrade Inset and supports use of previously defined routes along with utilizing existing infrastructure routes for the Huntley-Wilmarth 345 Kilovolt Transmission Line in their application to the Minnesota Public Utilities Commission.

Adopted by the Belgrade Township Board this ___ day of Sept., 2017.

Chair

ATTEST:

Township Clerk

[Signature]
October 10, 2017

As a resident of Belgrade Township, Nicollet County, Minnesota, I am demanding the withdrawal of the purposed Huntley Wilmarth 345kV transmission line through Belgrade Township.

Date ___ SIGNATURE/NAME ______ ADDRESS ______________________ PHONE# ______
1    Mike Mierustain  57472 Larry St. N. Mankato MN 56003
2    Karen Smith      41296 Judson Bottom Rd, North Mankato MN 56003
3    Jason Joe        52825 409th Ave No. Mankato, MN 56003
4    Lisa Lee         52885 409th Ave No. Mankato, MN 56003
5    Patricia Lee     52825 409th Ave IV Mankato, MN 56003
6    Susan Wolff      41116 Judson Bottom Road 507-995-0434
7    Walter Wolff     
8    Mary Lee         
9    Rhonda Lee       
10   Jeff              
11   Cheryl            
12   Jennifer          
13   Tim               41112 Judson Bottom Rd, North Mankato, MN 56003
14   Marily Frederick  38305 490th St, St. Peter, MN 56082
15   Andy Frederick   38305 490th St St. Peter, MN 56082
16   Andrew Frederick  41396 526th St North Mankato, MN 56003
17   Julie             40967 Jackson Bottom Rd. N. Mankato, MN 56003
18   Bob Lee           Belgrade resident
19   Doug Smith       Belgrade Township 41296 Judson Bottom Rd North Mankato
20   Jessica Smith    41355 Judson Bottom Rd N. Mankato MN 56003
21   Crabita Smith Jr 41355 Judson Bottom Rd N. Mankato MN 56003
22   Crabita Smith Jr
October 3, 2017

Thomas Hillstrom
Excel Energy
414 Nicollet Mall
Minneapolis, MN 55401

RE: 345 kV Huntley to Wilmarth Transmission Line Project
Blue Earth, Faribault, Nicollet and Martin Counties
SHPO No. 2017-3011

Dear Mr. Hillstrom:

Thank you for the opportunity to comment on the above project. Information received in our office on 5 September 2017 has been reviewed pursuant to the responsibilities given the Minnesota Historical Society by the Minnesota Historic Sites Act and the Minnesota Field Archaeology Act.

Due to the nature and location of the above project, we recommend that a Phase IA literature review and archaeological assessment be completed for the various route alternatives to assess the potential for intact archaeological sites in the project areas. If, as a result of this assessment, a Phase I archaeological survey is recommended for the preferred route, this Phase I survey should 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 this type of research and archaeological surveys, please visit the website http://www.mnhs.org/shpo/preservation-directory, and select "Archaeologists, Contract" in the "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 36 CFR § 800. If this project is considered for federal financial assistance, or requires a federal permit or license, then review and consultation with our office will need to be initiated by the lead federal agency. Be advised that comments and recommendations provided by our office for this state-level review may differ from findings and determinations made by the federal agency as part of review and consultation under Section 106.

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

Sincerely,

Sarah J. Beimers, Manager
Government Programs and Compliance
Butternut Township
October 8th, 2017

To: Xcel Energy

Re: Huntley-Wilmarth Transmission Line Project

The Board of Supervisors of the Butternut Valley Township in rural Blue Earth County requested that I send a letter stating that we, as a board and representing the citizens of our township, would only approve of the proposed upgrading of the Huntley-Wilmarth Transmission line project IF the current transmission line poles are removed and replaced with a single pole structure that is capable of handling both the current low energy lines and the proposed high energy lines. It appears the current transmission line poles are around 40 years old and they are susceptible to blow over by high winds over their current lifetime and it’s time for them to be replaced by a single pole structure. Also if they are not removed and more poles are added for the new transmission line, we can only imagine the difficulty of trying to farm around them in our township.

If you have any questions, please let me know at 507-276-9027 or jone0602@gmail.com

Sincerely,

Adam Jones, Clerk
Aaron Jones, Supervisor
Jon Stordahl, Supervisor
William Davis, Supervisor
Kristine Visher, Treasurer