STINSON

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August 22, 2022

Via Electronic Filing

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101-2147

Re: ***In the Matter of the Application of Dodge County Wind, LLC for a Certificate of Need, a Site Permit and a Route Permit for the up to 259 MW Large Wind Energy Conversion System and associated 161 kV Transmission Line in Dodge, Mower and Steele Counties, Minnesota*****, Docket Nos. IP6981/CN-20-865, IP6981/WS-20-866, and IP6981/TL-20-867**

Response of Dodge County Wind, LLC

Dear Mr. Seuffert:

On August 3, 2022, the Department of Commerce, Energy Environmental Review and Analysis (EERA) provided comments in response to Dodge County Wind, LLC's (DCW) July 29, 2022 filing that proposed alternative route segments for consideration in the Environmental Assessment to be prepared by EERA. In reply, EERA submitted comments requesting additional information on the alternative route segments. DCW's comments herein respond to EERA's requests for additional information.

1. Route width(s) for the new alternate route segments.

Response: DCW has modified the Route widths of the proposed alternative route segments consistent with the requirements of Minnesota Statutes Section 216E.01, subd. 8, which allows a route to have a variable width of up to 1.25 miles. Figures 1, 2, and 3 attached hereto illustrate the revised Route for the alternate segments. In addition, Figure 4 also attached shows the relationship of the Proposed Route provided in the January 14, 2022 Amended Route Application and the newly proposed alternate route segments. Alternate Segment A is proposed to have a Route width of 0.77 miles for the first 2.3 miles and 1.25 miles for the remainder of the segment. Alternate Segments B and C are proposed to have a Route width of 1.25 miles. The Route width selected for these alternate segments is intended to optimize the ability of the transmission line and structures to be placed within private easements, including allowance for accommodating landowner preferences. For instance, while some landowners may prefer the transmission line structures be placed on their property parallel and adjacent to road right-of-way (ROW), other landowners may prefer the

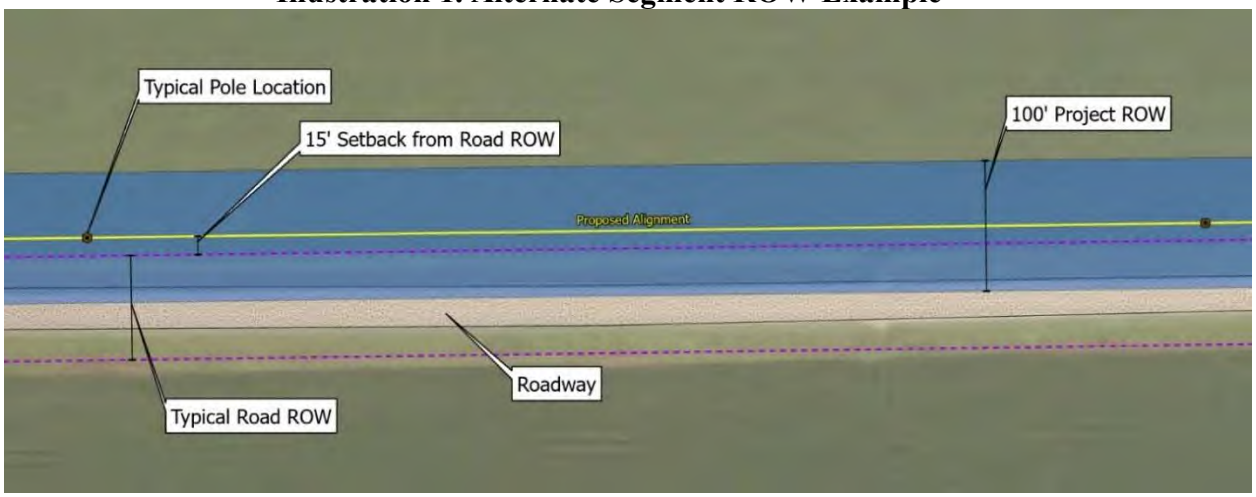
structures be placed elsewhere on their property. A wider Route width will allow DCW to accommodate landowner preferences.

Consistent with the proposed Route along alternate segments, DCW proposes to widen the Proposed Alignment's Route of originally proposed Segment 4 along 220th Avenue between 720th Street and 740th Street to 1.25 miles. In the Amended Route Application filed January 14, 2022, Section 2.2, DCW had requested a 450-foot-wide Route along most of the Proposed Alignment, including Segment 4 along 220th Avenue. However, as seen in the attached figures, Segment 4 is situated between Alternate Segment B and Alternate Segment C, and, therefore, to optimize the ability of the transmission line and structures to be placed within private easements for the alternate segments, DCW proposes a 1.25-mile-wide Route for Proposed Alignment Route Segment 4 to allow additional flexibility and input from landowners regarding structure placement on their property.

2. Anticipated ROW requirements for the proposed alternative route segments.

Response: DCW proposes to have ROW of 100 feet for the alternate route segments. As much of the new alternate segments will be located just outside of road ROW, Illustration 1 below shows how the Project ROW would be configured when the transmission line and structures are placed on private property just outside of road ROW. The alternate segment proposed alignment is approximately 15 feet away from the edge of road ROW.

Illustration 1. Alternate Segment ROW Example



3. Status of landowner agreements.

Response: Table 1, below, provides a status of landowner agreements. DCW currently has 20 miles of overhang easements, transmission placement easement, and co-located transmission agreements for the 26.8-mile length of the proposed alignment set forth in DCW's Amended Route Application filed January 14, 2022 (Application Alignment) and 4.1 miles of the 13.9-mile length of the proposed alternate route segments. DCW is confident that additional landowners targeted to provide easements for the alternative route segments will be amendable to executing easements to place the route segments outside of road ROW due to pre-existing relationships with many of the

landowners. Outreach activities and negotiations are currently underway with these landowners. DCW will file a map indicating the status of the execution of easements with these landowners as part of its Direct Testimony filed in this proceeding.

Table 1. Private ROW secured for each proposed segment.

Route Segment	Length targeted to acquire full transmission easement (miles)[1]	Length for full transmission easement agreement (miles)[2]	Length for overhang easement (miles)	Length co-located with GRE and no agreement (miles) [3]	Total Segment Length (miles)
Application Alignment Segment 1	0	2.6	0	n/a	2.6
Application Alignment Segment 2	4.4	0	2.9	n/a	7.3
Application Alignment Segment 3	0.6	0	3.4	n/a	4
Application Alignment Segment 4	0	0	2	n/a	2
Application Alignment Segment 5	0.7	0	2.3	n/a	3
Application Alignment Segment 6	0.8	0	4.6	2.5	7.9
Total Application Alignment	**6.5**	**2.6**	**15.2**	**2.5**	**26.8**
New Alternate Segment A	2.8	2.1	2	-	6.9
New Alternate Segment B	3.9	0	0	-	3.9
New Alternate Segment C	3.1	0	0	-	3.1
Total Alternate Segment	**9.8**	**2.1**	**2**	**0**	**13.9**

1. *Length targeted to acquire full transmission easement agreements, and where no final agreements have been negotiated to date. Targeted lengths include landowners who have been contacted and not yet contacted.*
2. *Full Transmission Easement Agreement indicates authority to place transmission poles on private property and approximately 15 ft from road ROW.*
3. *Transmission line co-located with GRE for 2.5 miles between 660 Ave and 680 Ave along 310th St. to the Great River Energy Pleasant Valley Substation.*

4. Additional information regarding the alternative route segments following more county roads rather than narrower township roads and the locations relative to the road ROW.

As previously noted, Illustration 1 above, shows how the Transmission Project may be located on private lands just adjacent, and parallel to, road ROW. For any portion of the alternative route segments that a landowner(s) decides not to execute an easement, DCW will show that placement of the transmission line in road ROW meets applicable safety requirements.

The identified alternate route segments are proposed to parallel both township (approx. 66 ft ROW) and county (approx. 90-100 ft ROW) roads, as set forth in Table 2, below, and displayed in Figure 5 attached hereto. Alternate Segment A parallels outside of township roads ROW for 5.2 miles and after the intersection at 690th Street and Highway 65, the alignment moves away from a township road to parallel the road for 1.7 miles. Alternate Segment B and C parallel county roads for 3.9 miles and 3.1 miles, respectively (Table 2). The county roads along the alternate route segments have wider road ROW to allow additional space for transmission structures with regard to traffic safety, drainage ditches within road ROW, and other road ROW functions.

Table 2. Length of Proposed Alignment and Alternate Segment Route ROW paralleling County and Township roads

Route Segment	Length paralleling County Road (miles)	Length paralleling Township Road (miles)	Length under no road authority (mile)	Total Segment Length
Road ROW Width	*Approx. 90-100 ft*	*Approx. 66 ft*	-	-
Proposed Application Alignment	11.2	13.5	2.1	26.8
Total Application Alignment	**11.2**	**13.5**	**2.1**	**26.8**
New Alternate Segment A	-	5.2	1.7	6.9
New Alternate Segment B	3.9	-	-	3.9
New Alternate Segment C	3.1	-	-	3.1
Total Alternate Segment	**7**	**5.2**	**1.7**	**13.9**

5. Authority to use eminent domain for the transmission line.

Response: DCW is not seeking the authority to use eminent domain for this Project.

6. Pros and Cons of undergrounding the Transmission Project.

Response: DCW is not proposing to underground the 161 kV transmission line. While an underground line, properly tested during commissioning, would have fewer expected outages than an overhead option due to weather events, the challenge with determining and resolving (*i.e.,* place back into service) an underground fault can prolong the outage when compared to resolving an above ground fault (*e.g.,* resolution time for underground transmission can take weeks versus resolution of above ground faults can typically be accomplished in a few hours or days).

The construction process for an underground line also involves installing a continuous duct bank as well as installing large concrete access structures every 2,000 to 2,500 feet. Underground environmental impacts can include altering vegetation management on the surface to avoid interferences with systems along the lines, which, in turn, might temporarily fracture habitats and leave landscape scarred. Impacts also include an increased risk of encountering archeological sites. Alternatively, undergrounding reduces visual impacts of a transmission line and further reduces the potential for avian collisions. Due to the digging during construction and the need to maintain around the access structures, an underground line in a rural area such as Dodge and Mower Counties would impact more agricultural land. However, an underground line will have less of an impact on agricultural spraying operations.

Importantly, due to the specialized equipment and labor, longer construction timeline, and greater requirements for materials like concrete, underground 161 kV transmission lines are estimated to be 6-8 times more expensive than an overhead option in rural areas. For DCW, this could increase the estimated transmission project costs, provided in Table 2.5 of the Amended Route Permit Application, from $35 - $45 million to $210 - $360 million. Given the increased costs and other disadvantages of undergrounding, DCW is requesting a Route Permit for an overhead 161 kV transmission line and is not proposing to underground the 161 kV transmission line.

DCW appreciates the opportunity to provide this additional information in response to EERA's comments.

Thank you for your attention to this Filing.

Respectfully Submitted,

Stinson LLP

/s/ Brian M. Meloy

Brian M. Meloy

Figure 1

Dodge County Wind, LLC

Figure 1 - Alternate Route Segments Overview

Dodge and Mower Counties, Minnesota

Issue Date:
8/18/2022

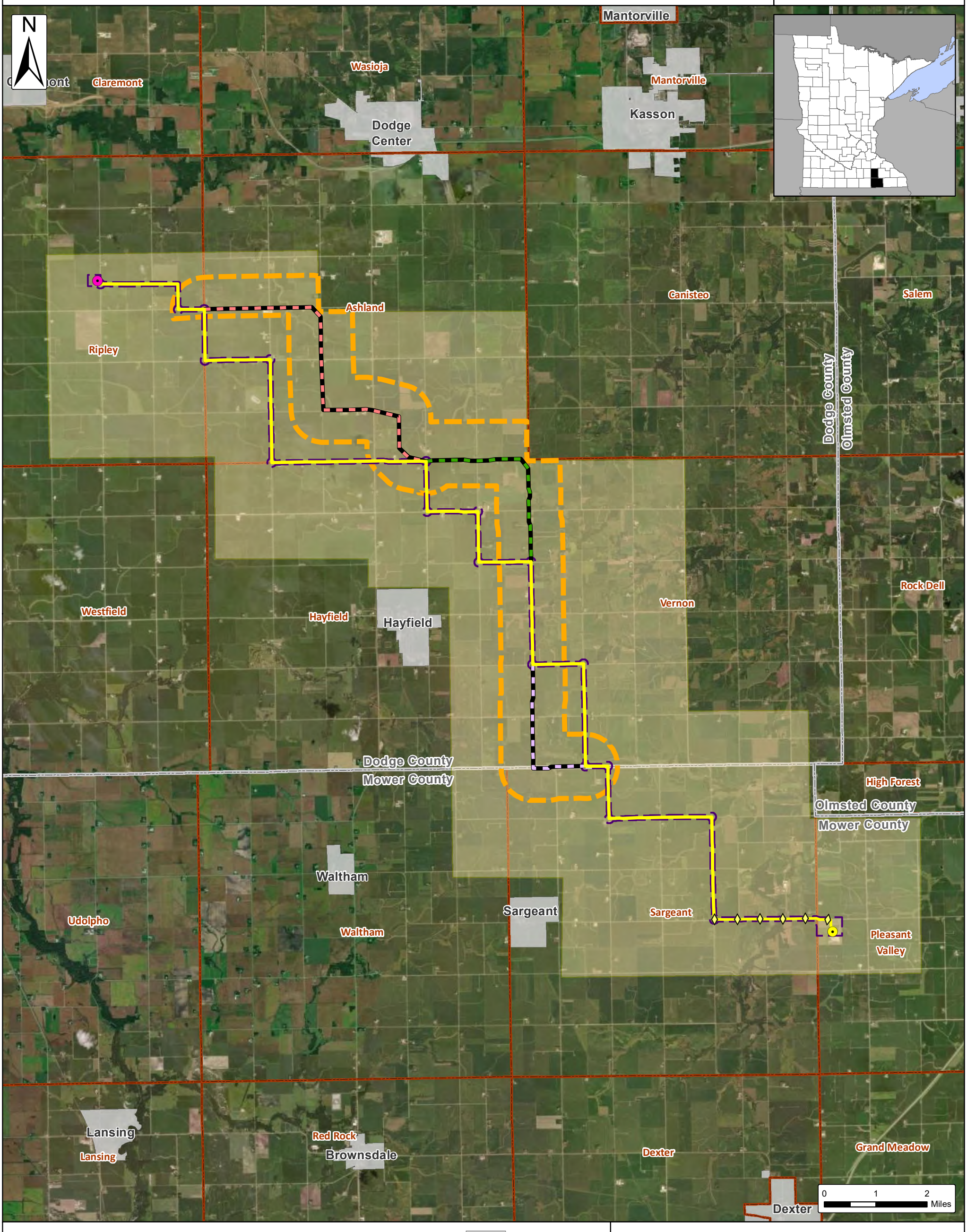


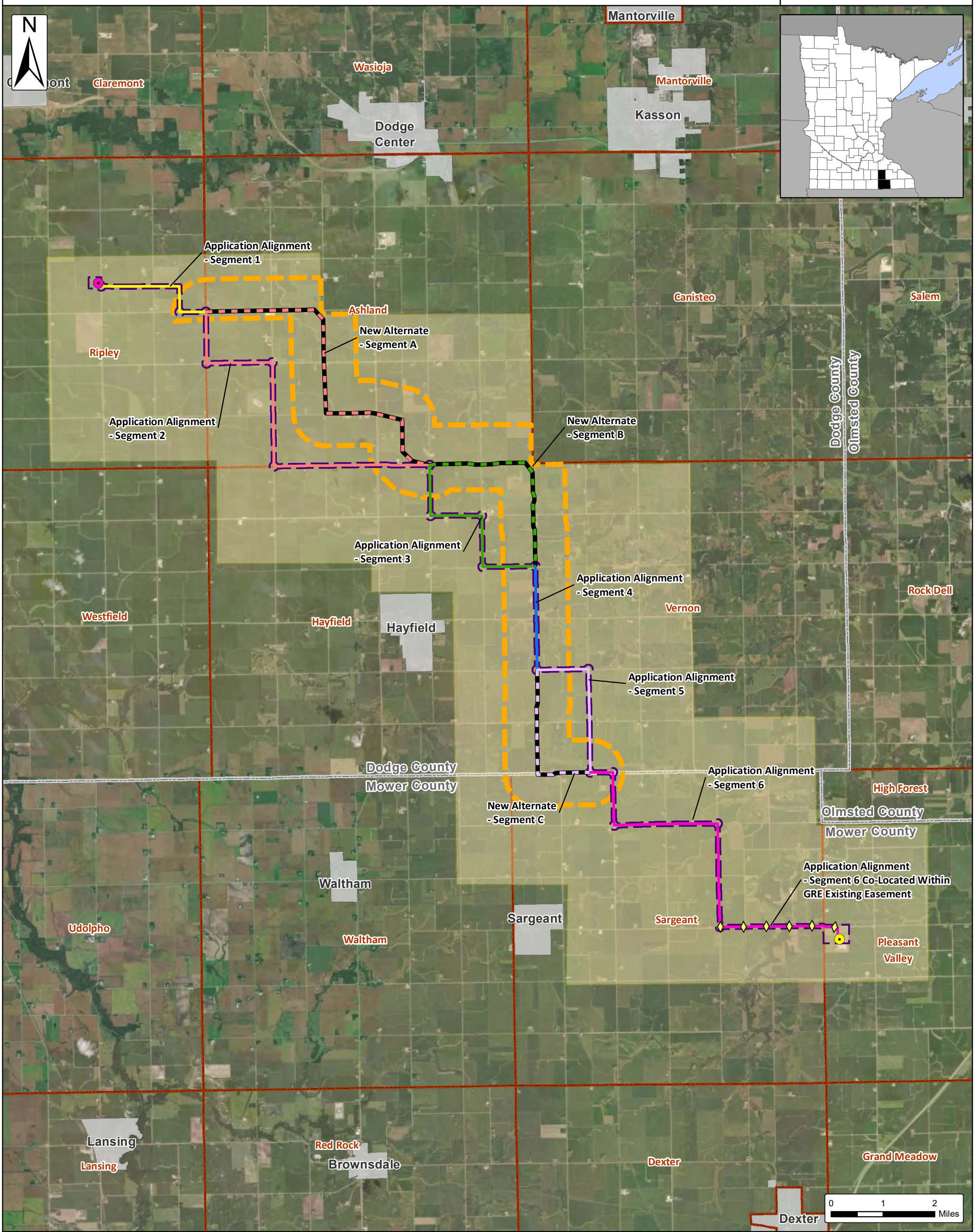
Figure 2

Dodge County Wind, LLC

Figure 2 - Newly Proposed Alternate Segments

Dodge and Mower Counties, Minnesota

Issue Date:
8/18/2022



DCW Collection Substation
GRE Pleasant Valley Substation
New Alternate Segment
New Alternate Segment B
New Alternate Segment C
Application Alignment - Segment
Application Alignment - Segment
Application Alignment - Segment
Application Alignment - Segment
Application Alignment - Segment
Application Alignment - Segment 6 Co-Located Within GRE Existing Easement
New Alternate Segment Route
Application Route Width
Transmission Line Notice
City/Village
Townships
Counties

ATWELL

Figure 3

N

Application Alignment - Segment 1

New Alternate Segment A

670th St

170th Ave

180th Ave

MNTH 56

Application Alignment - Segment 2

680th St

Ripley

Ashland

160th Ave

0 1,900 3,800 Feet

Dodge County Wind, LLC

Figure 3 - Alternate Segment Detailed Review

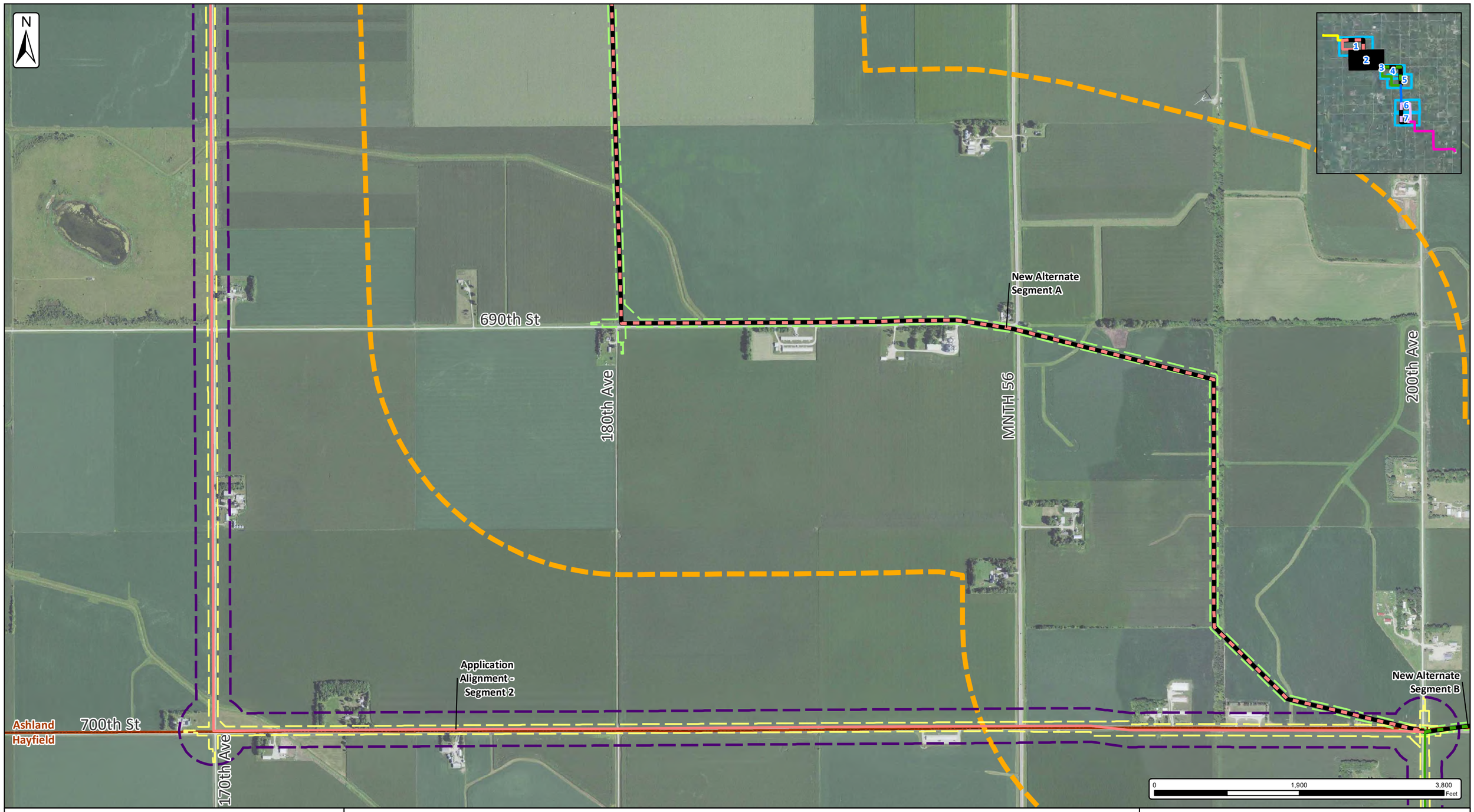
Dodge and Mower County, Minnesota

Date: 8/18/2022

Page 1. Application Alignment - Segment 2 being compared to New Alternate - Segment A

- New Alternate Segment A
- Application Alignment - Segment 1
- Application Alignment - Segment 2
- Application Route Width
- New Alternate Right-of-Way
- Application Right-of-Way
- New Alternate Segment Route Width
- Counties
- Township

ATWELL



Dodge County Wind, LLC

Figure 3 - Alternate Segment Detailed Review

Dodge and Mower County, Minnesota

Date: 8/18/2022

Page 1. Application Alignment - Segment 2 being compared to New Alternate - Segment A

- New Alternate Segment A
- New Alternate Segment B
- Application Alignment - Segment 2
- Application Alignment - Segment 3
- Application Route Width
- New Alternate Right-of-Way
- Application Right-of-Way
- New Alternate Segment Route Width
- Counties
- Township

ATWELL

N

New Alternate Segment A

Application Alignment - Segment 2

New Alternate Segment B

Ashland

Hayfield

700th St

200th Ave

Application Alignment - Segment 3

0 130 260 Feet

Dodge County Wind, LLC

Figure 3 - Alternate Segment Detailed Review

Dodge and Mower County, Minnesota

Date: 8/18/2022

Page 3. New Alternate - Segments A and B

- New Alternate Segment A
- New Alternate Segment B
- Application Alignment - Segment 2
- Application Alignment - Segment 3
- Application Route Width
- New Alternate Right-of-Way
- Application Right-of-Way
- New Alternate Segment Route Width
- Counties
- Township

ATWELL

N

New Alternate Segment A

Application Alignment - Segment 2

Ashland

Hayfield

New Alternate Segment B

700th St

Ashland

Canisteo

210th Ave

220th Ave

Hayfield

Vernon

Application Alignment - Segment 3

710th St

200th Ave

0 1,300 2,600 Feet

Dodge County Wind, LLC

Figure 3 - Alternate Segment Detailed Review

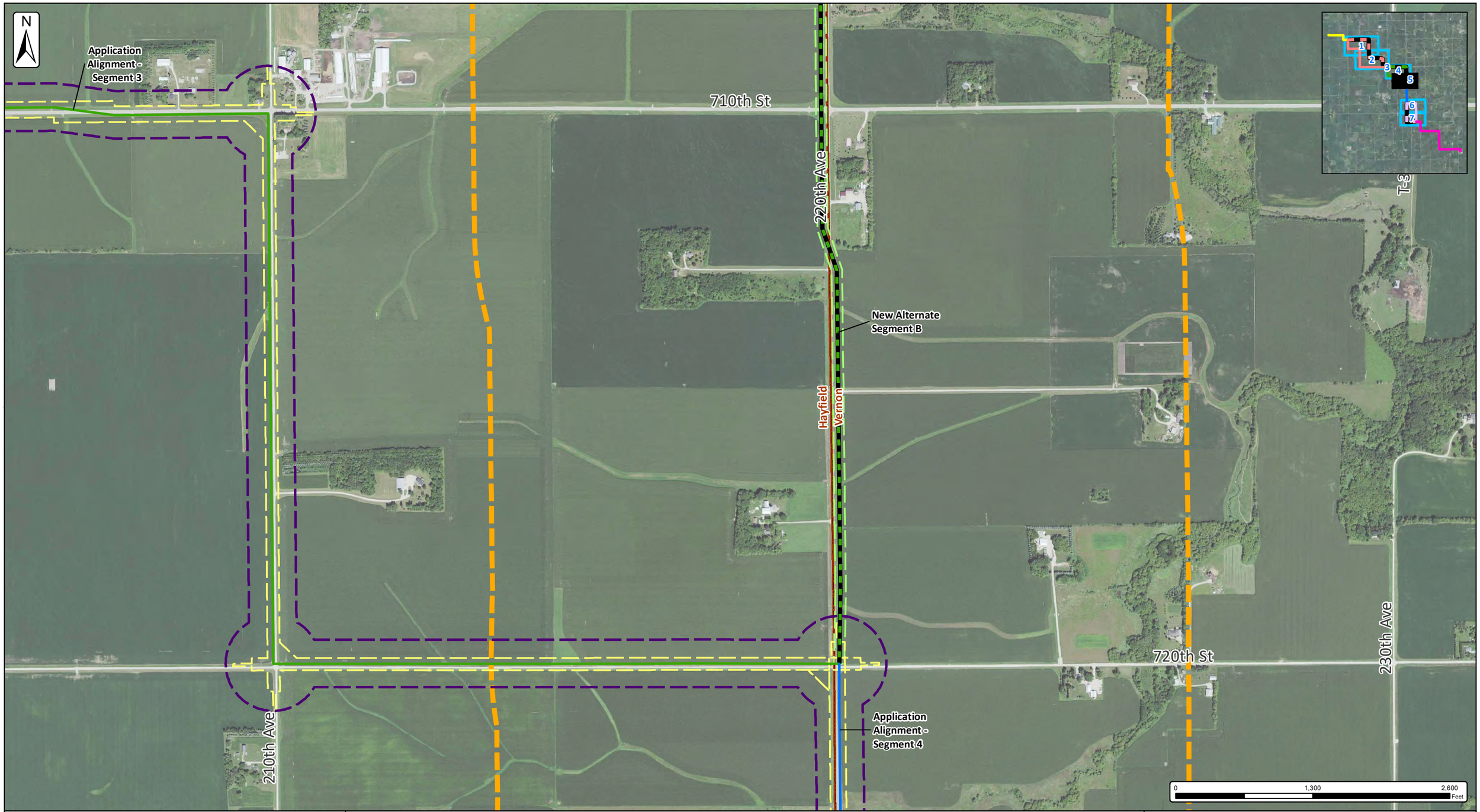
Dodge and Mower County, Minnesota

Date: 8/18/2022

Page 4. Application Alignment - Segment 3 being compared to New Alternate - Segment B

- New Alternate Segment A
- New Alternate Segment B
- Application Alignment - Segment 2
- Application Alignment - Segment 3
- Application Route Width
- New Alternate Right-of-Way
- Application Right-of-Way
- New Alternate Segment Route Width
- Counties
- Township

ATWELL



Dodge County Wind, LLC

Figure 3 - Alternate Segment Detailed Review

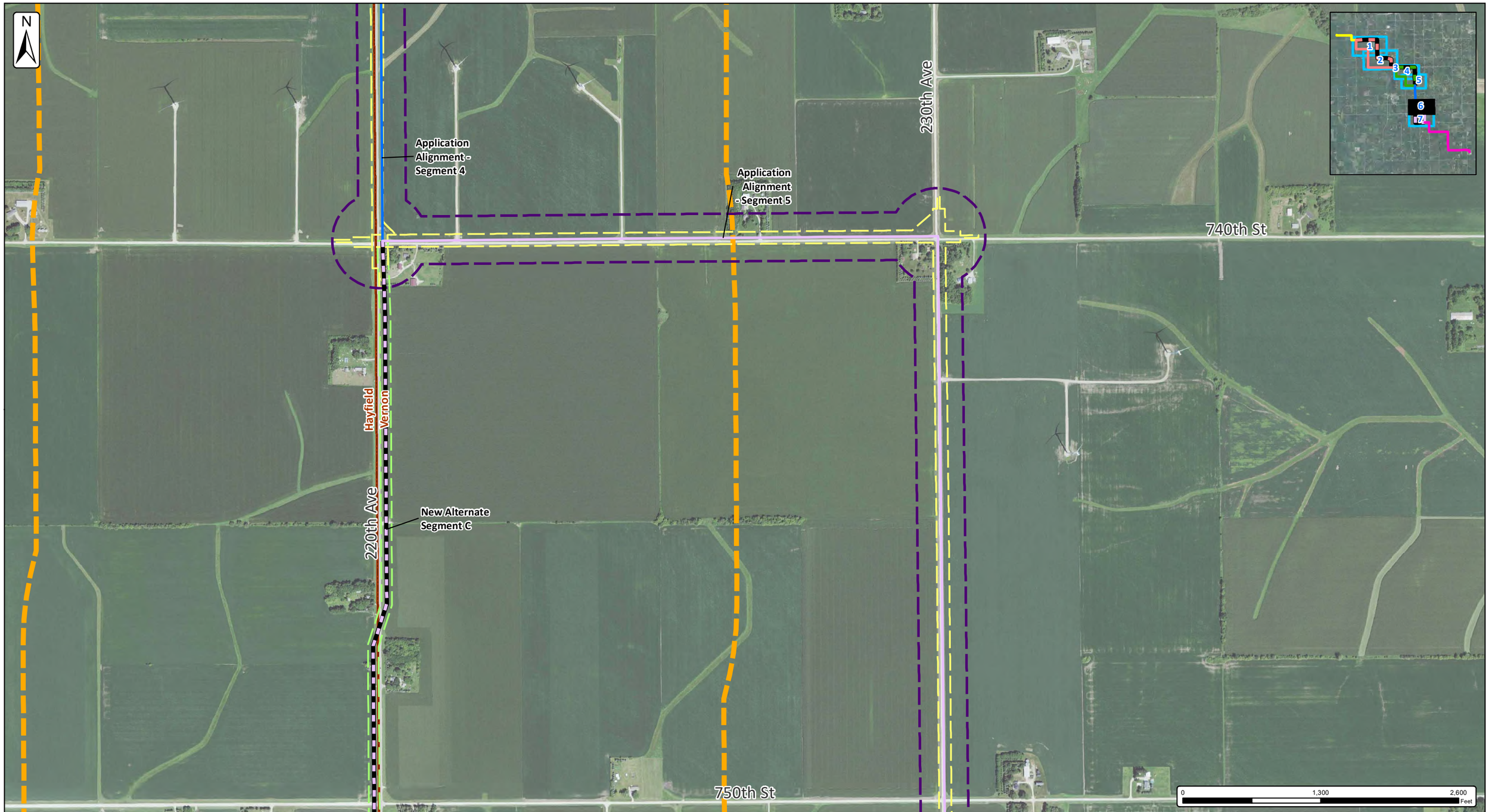
Dodge and Mower County, Minnesota

Date: 8/18/2022

Page 5. Application Alignment - Segment 3 being compared to New Alternate - Segment B

- New Alternate Segment B
- Application Alignment - Segment 3
- Application Alignment - Segment 4
- Application Route Width
- New Alternate Right-of-Way
- Application Right-of-Way
- New Alternate Segment Route Width
- Counties
- Township

ATWELL



Dodge County Wind, LLC

Figure 3 - Alternate Segment Detailed Review

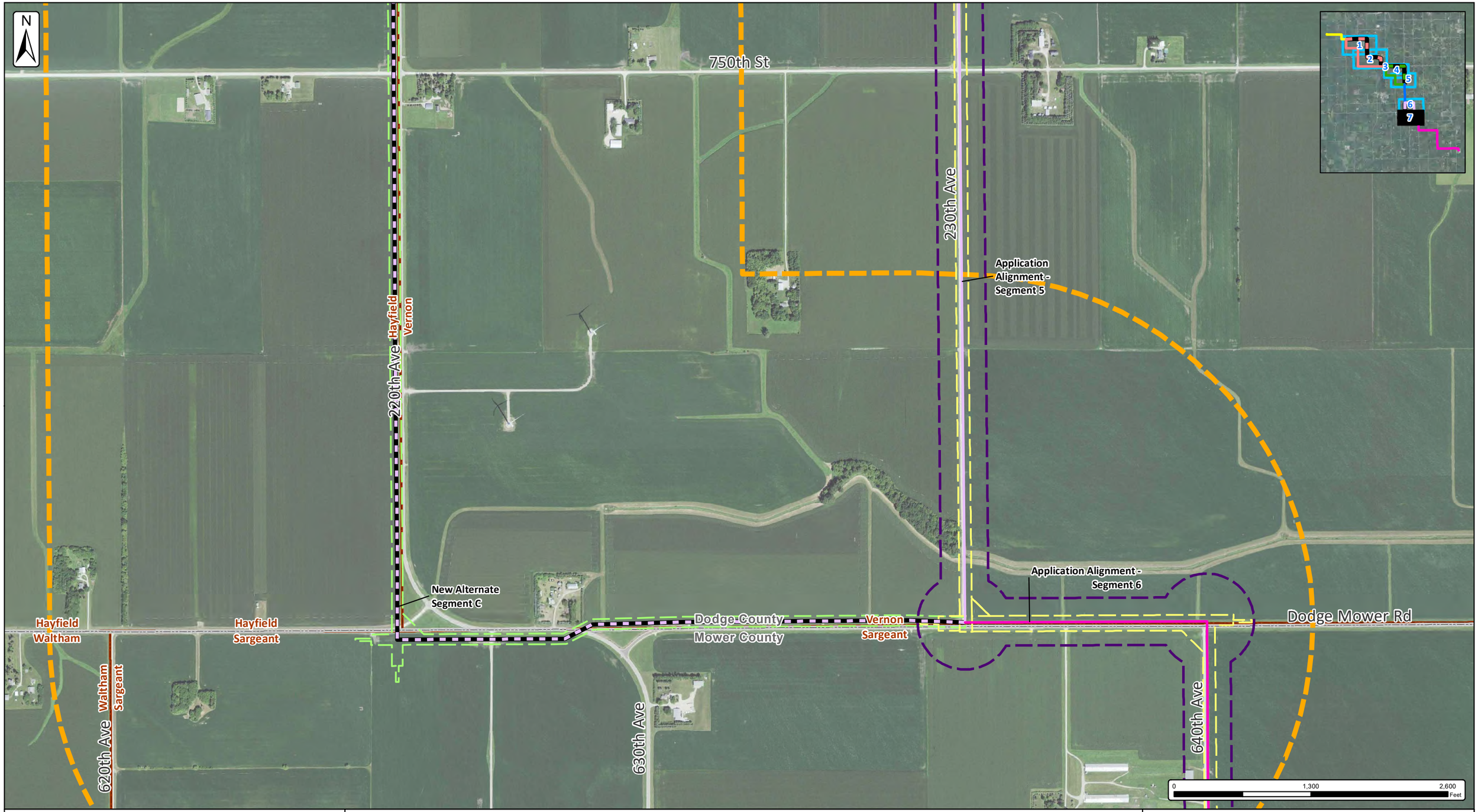
Dodge and Mower County, Minnesota

Date: 8/18/2022

Page 6. Application Alignment - Segment 5 being compared to New Alternate - Segment C

- New Alternate Segment C
- Application Alignment - Segment 4
- Application Alignment - Segment 5
- Application Route Width
- New Alternate Right-of-Way
- Application Right-of-Way
- New Alternate Segment Route Width
- Counties
- Township

ATWELL



Dodge County Wind, LLC

Figure 3 - Alternate Segment Detailed Review

Dodge and Mower County, Minnesota

Date: 8/18/2022

Page 7. Application Alignment - Segment 5 being compared to New Alternate - Segment C

- New Alternate Segment C
- Application Alignment - Segment 5
- Application Alignment - Segment 6
- Application Route Width
- New Alternate Right-of-Way
- Application Right-of-Way
- New Alternate Segment Route Width
- Counties
- Township

ATWELL

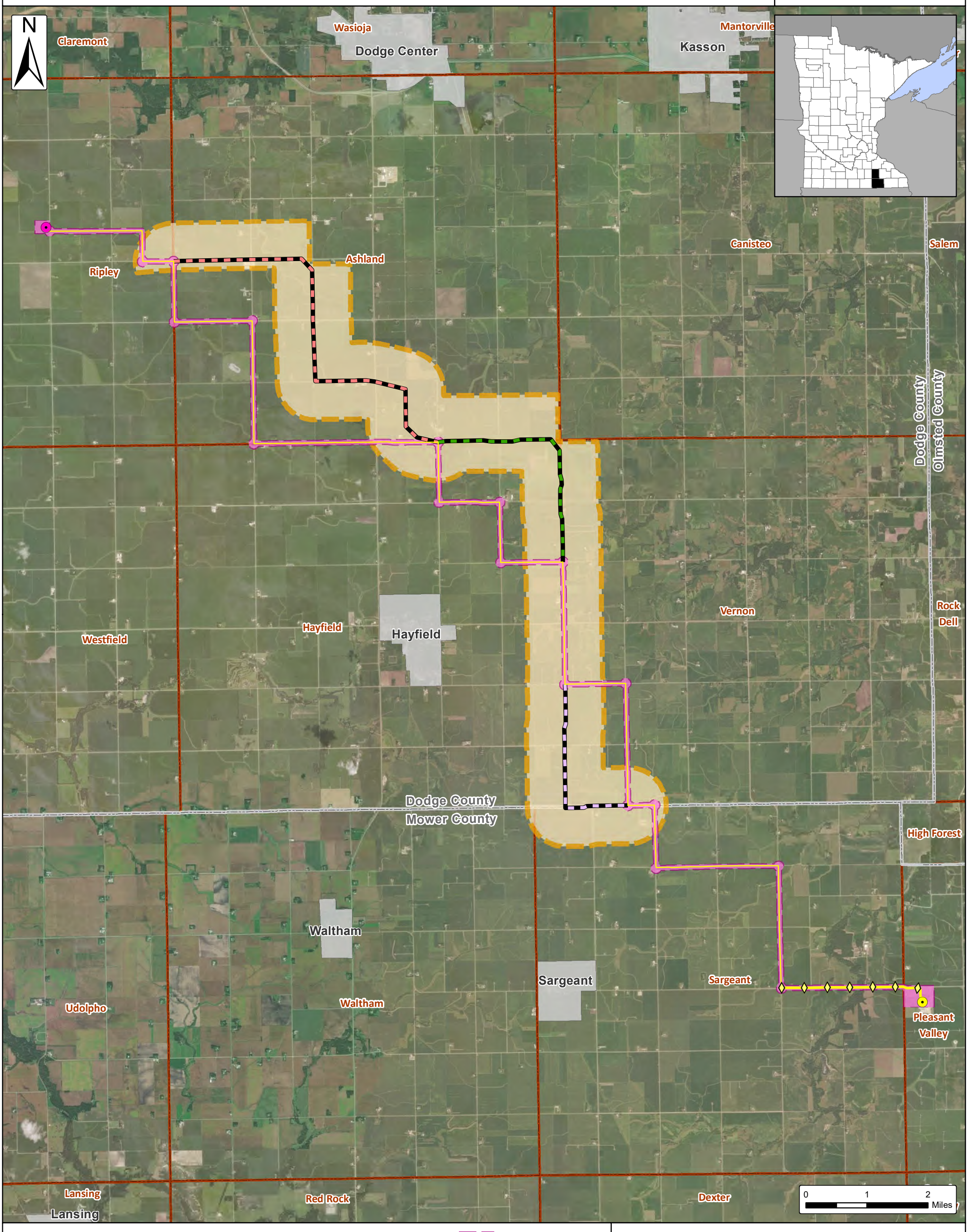
Figure 4

Dodge County Wind, LLC

Figure 4 - Route Comparison

Dodge and Mower Counties, Minnesota

Issue Date:
8/18/2022



DCW Collection Substation
GRE Pleasant Valley Substation
Application Alignment
Co-Located Within GRE Existing Easement
New Alternate Segment A
New Alternate Segment B
New Alternate Segment C
New Alternate Segment Route Width
Application Route Width
City/Village
Townships
Counties

ATWELL

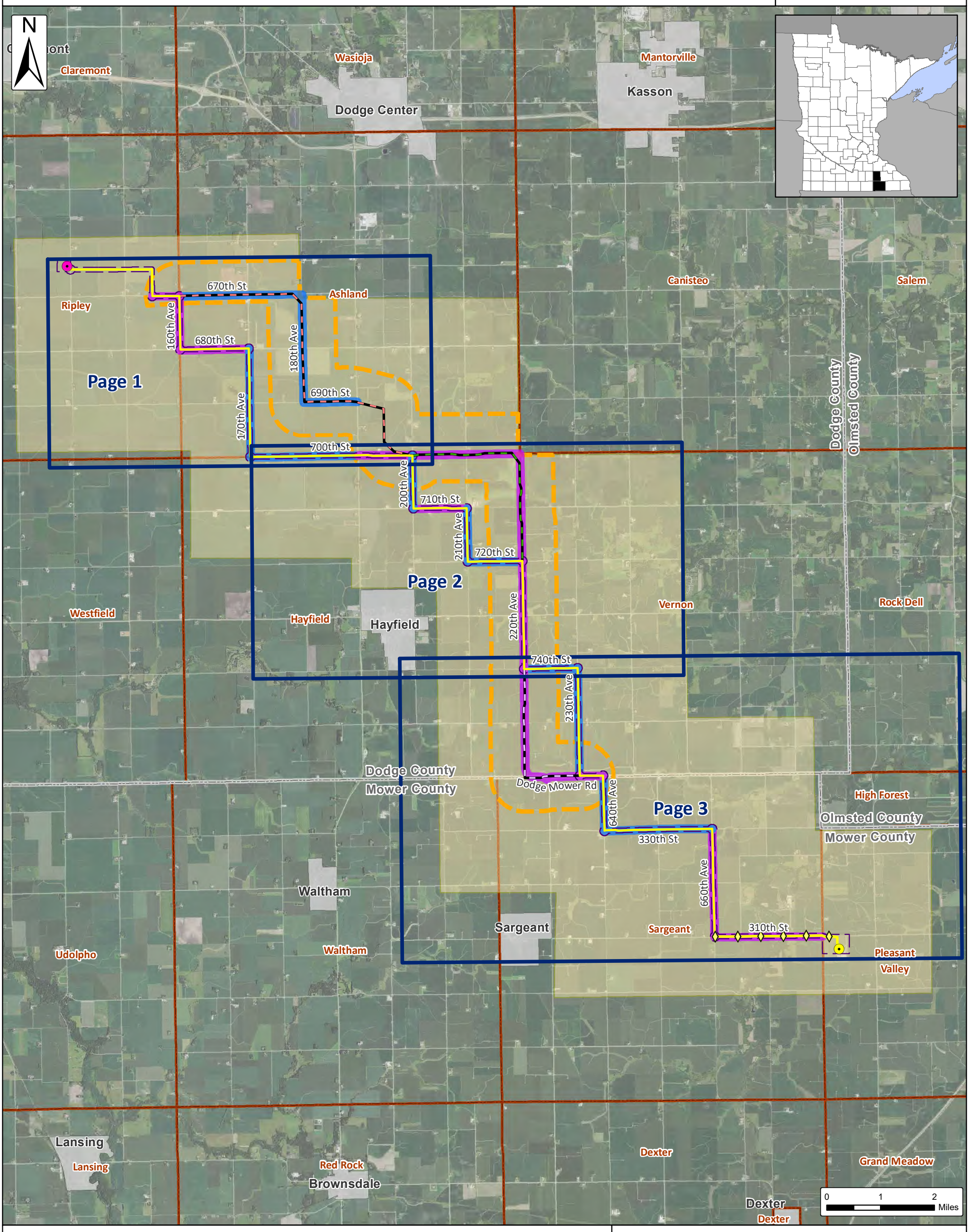
Figure 5

Dodge County Wind, LLC

Figure 5 - Dodge and Mower Road Right of Way Width

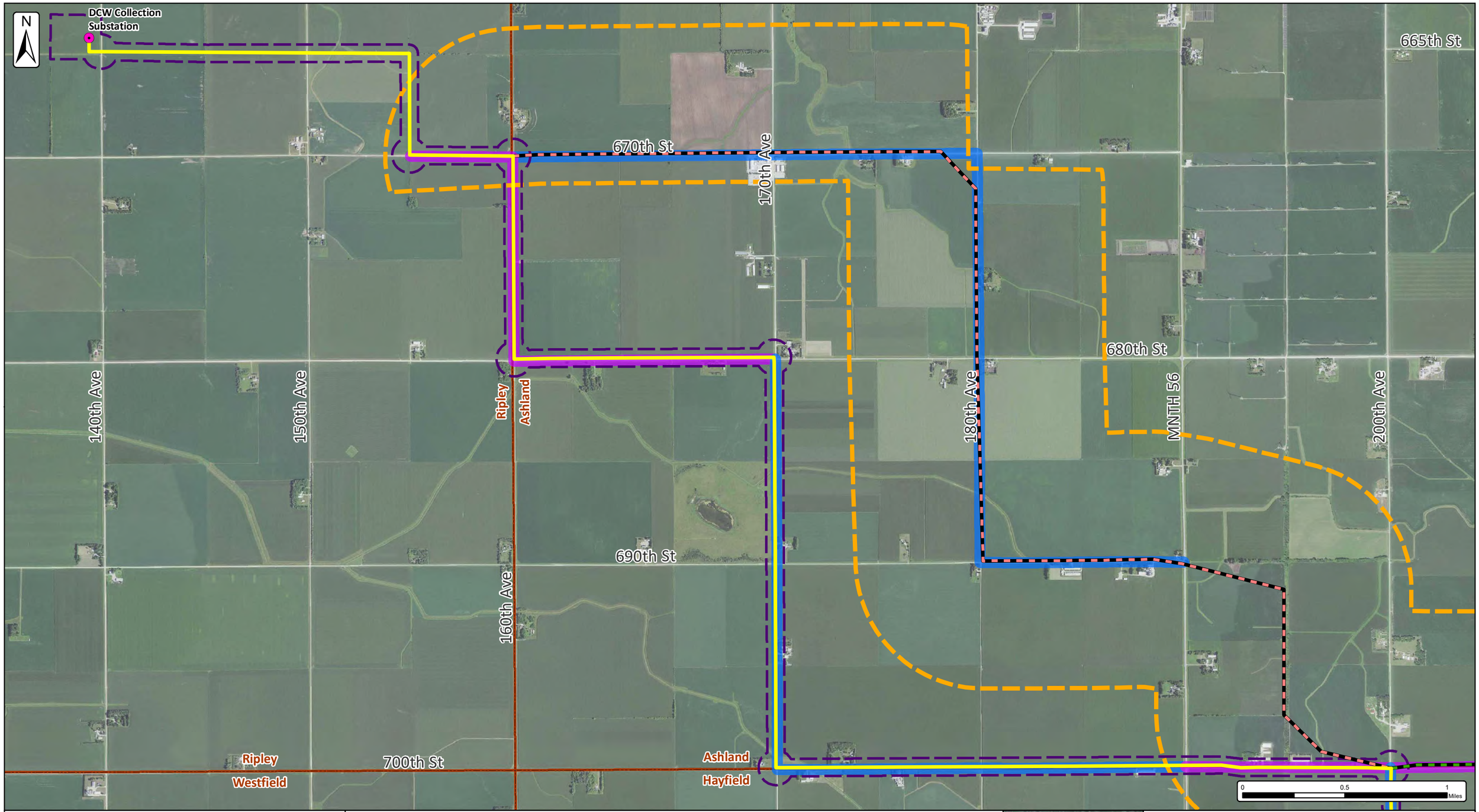
Dodge and Mower Counties, Minnesota

Issue Date:
8/19/2022



DCW Collection Substation
GRE Pleasant Valley Substation
Application Alignment
Co-Located Within GRE Existing Easement
New Alternate Segment A
New Alternate Segment B
New Alternate Segment C
New Alternate Segment Route Width
Application Route Width
Transmission Line Notice Area
Road Authority
County (Approx. 90-100 ft. ROW)
Township (Approx. 66 ft. ROW)
Mapbook Page
City/Village
Townships
Counties

ATWELL



Dodge County Wind, LLC

Figure 5 - Dodge and Mower Road Right of Way Width Page 1 of 3

Dodge and Mower County, Minnesota

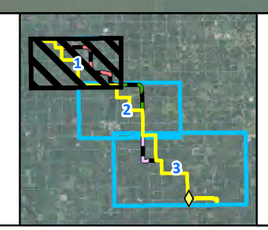
Date: 8/19/2022

- DCW Collection Substation
- Application Alignment
- New Alternate Segment A
- New Alternate Segment B
- Application Route Width
- New Alternate Segment Route Width

Road Authority

- County (Approx. 90-100 ft. ROW)
- Township (Approx. 66 ft. ROW)

- Counties
- Township



ATWELL

N

Ashland
Hayfield
700th St
Canisteo
Vernon
180th Ave
220th Ave
230th Ave
710th St
T-359
200th Ave
250th Ave
170th Ave
720th St
MNTH 56
Hayfield
Vernon
720th St
240th Ave
6th Ave
5th St N
4th St NW
3rd St NE
2nd St N
2nd Ave NW
1st St N
MNTH 30
1st St SE
M-48
Center Ave S
1st Ave E
Hayfield
210th Ave
MNTH 30
230th Ave
180th Ave
6th Ave SE
7th St SE
9th St SE
740th St
0 0.5 1 Miles

Dodge County Wind, LLC

Figure 5 - Dodge and Mower Road Right of Way Width Page 2 of 3

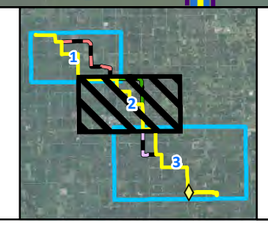
Dodge and Mower County, Minnesota

Date: 8/19/2022

- Application Alignment
- New Alternate Segment A
- New Alternate Segment B
- New Alternate Segment C
- Application Route Width
- New Alternate Segment Route Width

Road Authority
- County (Approx. 90-100 ft. ROW)
- Township (Approx. 66 ft. ROW)

- Counties
- Township



ATWELL

Dodge County Wind, LLC

Figure 5 - Dodge and Mower Road Right of Way Width Page 3 of 3

Dodge and Mower County, Minnesota

Date: 8/19/2022

GRE Pleasant Valley Substation

Application Alignment

Co-Located Within GRE Existing Easement

New Alternate Segment C

Application Route Width

New Alternate Segment Route Width

Road Authority

County (Approx. 90-100 ft. ROW)

Township (Approx. 66 ft. ROW)

Counties

Township

ATWELL

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

In the Matter of the Application of Dodge County Wind, LLC for a Certificate of Need, a Site Permit and a Route Permit for the up to 259 MW Large Wind Energy Conversion System and associated 161 kV Transmission Line in Dodge, Mower and Steele Counties, Minnesota	)	Docket Nos. IP6981/CN-20-865 IP6981/WS-20-866 IP6981/TL-20-867 **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the **Response of Dodge County Wind to EERA's requests for additional information** has been served today by e-mail and/or U.S. Mail to the following:

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Dated this 22nd day of August, 2022

/s/ Joshua Feit
Joshua Feit