

Dear Advisory Committee Members,

Due to a work conflict, I will be unable to attend the 12-1246 Rulemaking Advisory Committee meeting this Wednesday, June 26. I will have someone sit at the table in my place.

I would like to comment on the following.

I. Identified Issues- May 29, 2013 meeting.

*Though it has been suggested that processes be appropriate to the size of the projects, it cannot be overlooked that even smaller projects are considered High Voltage if 100 kV or greater. And according to MN Statute 216E.03, subd. 7, (e), this means a transmission corridor. The rash of distribution lines being converted to 115 kV is being done without the landowners fully understanding the consequences of this "change".

*I do not recall discussion regarding simplification of property acquisition. Please expand.

*The word "streamline" is of concern. The process is, for good reason, tedious. I fear that streamline may eliminate, overlook or minimize public understanding and participation.

*Omitted from the identified issues is the discussion regarding the public interest and concern with respect to "need".

II. Change to the Working Draft.

*Definitions. Please consider inclusion of "summer peak" and "winter peak", since "summer season" and "winter season" have been omitted.

*Subpart4, item B. The change in language to "within *one half mile of* the project footprint". I would like to suggest that it be broadened to *1 mile or 1 section*, and with reference to wind, *2 miles or 2 sections*. If we consider the many changes made during siting and routing, and the United States Fish and Wildlife Service (USFWS) clear recommendation of setback between a bald eagle nest and a wind turbine of two (2) miles. this would draw attention to potential problems often cited by landowners early in the process.

*7849.0130, Subp 2. G. *each county, incorporated municipality, township, and regional development commission within ~~ten miles of~~ a proposed project*. This should not be stricken, or languages should be at least this inclusive. This alerts communities, and increases public participation.

*7849.0130, Subp. 8. Good Faith sufficient. The reference to "substantial compliance" with any commission orders is vague, and allows for "inadvertent" notice omissions. Orders are orders. It is the responsibility of the applicant to "get it right". Please discuss.

*7849.0130, Subp 9. Press release. This subsection should be included. This increases public awareness and participation.

*7849.0130, Subp. 11. Affidavit of press release within seven days should remain included.

JUNE 26 MEETING: Additional sections:

*7849.0230- Environmental Report. Please discuss why this is being deleted.

*7849.0215, Subp. 4, Public Hearing. I suggest inclusion of Statute language clarifying that opinion is being obtained on "*the necessity of granting a certificate of need, and if a joint hearing is held, a site or route permit*" as in MN Statute 216B.243, Subd. 4. The public needs consistent and explicative language.

Thank you for your consideration. I am hopeful for a productive meeting for you all.

Sincerely yours,

Suzanne Rohlfing

North Route Group