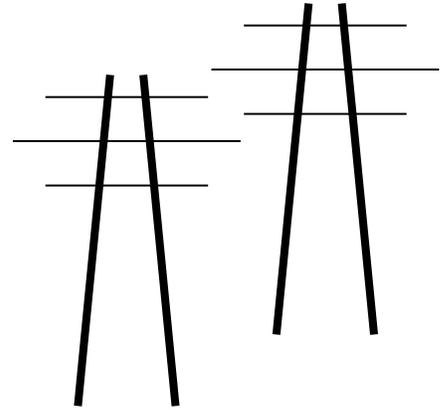


# Legalelectric, Inc.

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August 4, 2021

Will Seuffert  
Executive Secretary  
Public Utilities Commission  
121 – 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101-2147

via eDockets only

RE: Great River Energy and Nexus Laine, LLC's Joint Request for Partial Transfer of  
Legacy Construction Permit  
PUC Docket No. ET2/TL-21-434

Dear Mr. Seuffert:

Please add my name to the service list for the above-entitled docket.

On reviewing the Comments of the parties, and in consideration of the "Topic(s) Open for Comment, and also those subjects of the July 8 Notice for Comments, I offer these thoughts:

First and foremost, the transfer of the route permit should not be approved until the details of the transmission line, transformers, and conductor uprate/replacement/rehab is disclosed and opportunity is provided for public comment. Review is necessary to determine whether the transfer and imposition on ratepayers is in the public interest. That information should include, but not limited to:

- Date and cost of uprate/replacement/rehab (permit was not required)
- FERC authorized return on investment/equity
- Transformer specifications
- DC/AC conversion equipment details
- Conductor specifications including conductor, amps and MVA
- Capacity and loading details
- Transmission service revenue over previous 5 years and 2021 to date
- Maintenance costs over previous 5 years and 2021 to date

Prior to approval and transfer, given acknowledgement and knowledge of ground current issues,

Section 1.11 of the permit should be updated with more current (... sigh...) knowledge, particularly regarding impacts on pipelines.

(1.11) The ground electrode shall be designed, constructed, and operated in such a manner so as to minimize ground current effects on buried metallic structures. CPA and UPA shall, as permitted by their construction schedule, cooperate with pipeline companies prior to the commercial operation of the HVdc system in the monopolar ground return mode, so that the pipeline companies may perform such tests as they wish to determine the ground currents, if any, which might affect their facilities.

Prior to approval and transfer, the line should be monitored to assure compliance with noise requirements of Sections 2.3 and 2.4.

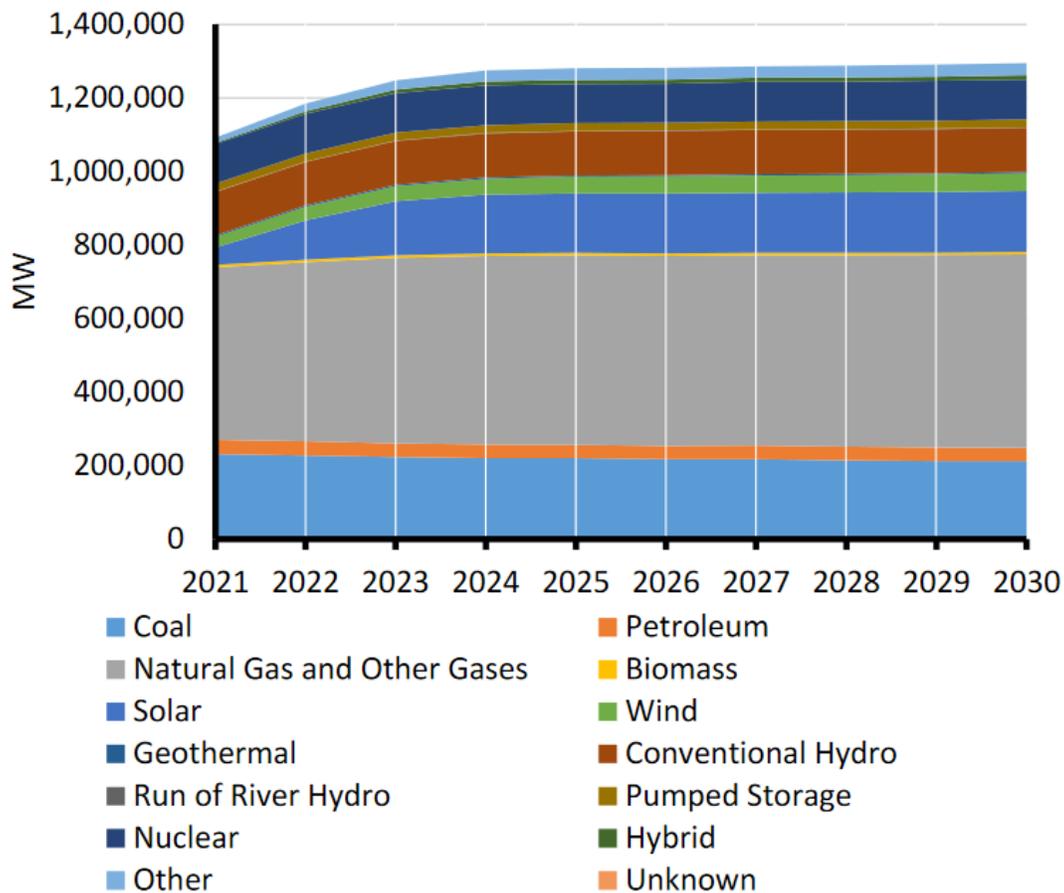
Prior to approval and transfer, Attachment C should be publicly filed in eDockets. CEII is only applicable where it has been filed with FERC. GRE's claim that "if made public, could substantially jeopardize the security of Great River Energy's facilities" is histrionic disinformation. Disclosure of Attachment C will not make this infrastructure any more vulnerable. The infrastructure is existing in the physical world, and on google earth, there for anyone to see. For example:



Regarding the Comments of MCEA:

- It would be helpful to know the details of the topics of their claimed “research.”
- The “impacts of the transfer on cooperative members and the public” should be disclosed and analyzed.
- \$130 million in upgrades in recent years includes upgrades to coal plant? Transmission?
- Cost impacts must be presented in detail, and “benefits” as well, including expected return on investment for capital cost of upgrades and revenues for provision of transmission service.
- Corporate information must be provided as requested, including ties to GRE, co-ops, lobbyists, etc.

GRE had previously pledged to close this plant, but reneged on that announcement. Meanwhile, NERC’s 2020 Long Term Reliability Assessment, p. 29<sup>1</sup>, notes that coal generation remains steady and few plants will be closing over the next 10 years:



**Figure 18: Existing, Tier 1, and Tier 2 Planned Resources Projected Through 2030**

<sup>1</sup> Online at: [https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC\\_LTRA\\_2020.pdf](https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC_LTRA_2020.pdf)

When looking at that generation chart, remember 15% reserve margins and how the massive transmission build-out was to reduce reserve margins? That's not come to pass:

The results of NERC's risk determination for all assessment areas is shown in [Table 1](#). NPCC-Ontario is identified as "Inadequate," MISO and Maritimes as "Marginal," and all other areas identified as "Adequate" through 2025.<sup>14</sup> See the [NERC Assessment Areas](#) section for demand and supply trends through 2030.

**Table 1: NERC's Risk Determination of All Assessment Areas 5-Year Projected Reserve Margins**

Assessment Area	2025 Peak Anticipated Reserve Margin	2025 Reference Margin Level	Expected Capacity Surplus or Shortfall (MW)	Assessment Results Through 2025
MISO	17.0%	18.0%	-1,161	Marginal
MRO-Manitoba	13.5%	12.0%	70	Adequate
MRO-SaskPower	31.5%	11.0%	742	Adequate
NPCC-Maritimes	20.7%	20.0%	36	Marginal (2022, 2023)
NPCC-New England	19.0%	12.7%	1,522	Adequate
NPCC-New York	17.1%	15.0%	661	Adequate
NPCC-Ontario	2.0%	15.9%	-3,236	Inadequate
NPCC-Quebec	13.5%	10.1%	1,264	Adequate
PJM	41.1%	14.8%	37,856	Adequate
SERC-C	23.6%	15.0%	3,469	Adequate
SERC-E	27.4%	15.0%	5,667	Adequate
SERC-FP	22.2%	15.0%	3,439	Adequate
SERC-SE	40.9%	15.0%	11,907	Adequate
SPP	23.4%	15.8%	4,124	Adequate
TRE-ERCOT	14.3%	13.8%	412	Adequate
WECC-AB	23.6%	14.1%	1,211	Adequate
WECC-BC	24.1%	14.1%	1,163	Adequate
WECC-CAMX	22.5%	19.1%	1,852	Adequate
WECC-NWPP-US and RMRG	20.8%	15.0%	3,764	Adequate
WECC-SRSG	15.5%	10.7%	1,315	Adequate

Id., p. 14. Look at the difference at 15% reserve margin makes on NERC projections and MISO's "marginal" assessment. Transmission is the cash cow of utilities new "business plan," and how this transfer of transmission plays into that plan deserves scrutiny.

Minnesota's Public Utilities Commission is the regulator, and has a job to do. The impacts of the transfer of the transmission route permit, which facilitates the "sale" of the coal plant, should be thoroughly considered. Transfer of the transmission permit is likely not in the public interest.

The Commission must take a hard look. That requires more information and time for analysis.

Very truly yours,



Carol A. Overland  
Attorney at Law