

**BEFORE THE MINNESOTA OFFICE OF
ADMINISTRATIVE HEARINGS
FOR THE
MINNESOTA ENVIRONMENTAL QUALITY BOARD**

In the matter of Xcel Energy's Application
To the Minnesota Environmental Quality Board
For a Route Permit for a 345kV Transmission
Line from the Split Rock Substation to Lakefield
Junction Substation and a 115kV Transmission
Line from Nobles County Substation to
Chanarambie Substation and the Nobles County
Substation

**PETITION TO
INTERVENE**

Public Intervenors Network, hereinafter "PIN," hereby petitions to intervene in the above proceeding. Xcel Energy has submitted an application to the Environmental Quality Board for a Route Permit for a 345kV transmission line from the Split Rock substation to Lakefield Junction substation and a 115kV Transmission Line from Nobles County Substation to Chanarambie Substation and the Nobles County Substation. PIN is an organization organized in the state of Minnesota that has members in Minnesota and Wisconsin who live near and have extensively participated in the Arrowhead transmission line proceedings in Minnesota and Wisconsin, the Chisago transmission line proceedings in Minnesota and Wisconsin, and in the Florence Township nuclear waste permitting proceedings in Minnesota and before the federal Nuclear Regulatory Commission. PIN has Intervened as a full party in the SW Minnesota Docket before the PUC¹.

PIN's interests are not adequately represented by one or more parties participating in this case. Minn. R. 7829.0800, Subp. 2, and PIN can best represent those interests. At this time, there are no parties

¹ OAH Docket No. 15-2500-14699-2; MPUC Docket No. E-002/CN-01-1958

participating in this case as the two other parties that submitted late intervention Petitions have not appeared yet in the hearings. No party has raised the reliability issues regarding double circuiting costs and engineering considerations that PIN plans to raise.

PIN has the advantage of the record, expert engineering review, and prior participation in the PUC docket to help us evaluate the criteria of the EQB's analysis, including displacement of landowners along the route and substation noise, (Minn. R. 4400.3150 A); effects on land based economics including agricultural losses due to route selection and placement of structures (Minn. R. 4400.3150 C); application of design options that maximize energy efficiencies such as double circuiting, conductor size and redundancy, mitigate adverse environmental effects, and could accommodate expansion of transmission or generating capacity in the area that is wind specific or other generation (Minn. R. 3150 G); use or paralleling of existing rights-of-way whether owned by Xcel or other utilities, and review of survey lines, natural division lines, and agricultural field boundaries as above in Subpart C (Minn. R. 3150 H); use of existing electrical transmission systems or rights-of-way, specifically Alliant v. separate route (Minn. R. 3150 J); electrical system reliability provided by the line as proposed and through construction (Minn. R. 3150 K). There is a glaring dearth of Intervenor and participants in this proceeding, and at this admittedly late date, PIN respectfully requests that it be granted leave to intervene as a party.

PIN requests that all correspondence, notices, comments, pleadings and orders, be served to PIN at the following address:

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