

Memo

To: Commissioner Kalk

From: Sara Cardwell,^{SC} Public Utility Analyst

Date: April 13, 2016

**Re: Allete, Inc.
230 kV Transmission Line – Morton/Oliver Counties
Siting Application
Case No. PU-09-587**

On January 28, 2016, a work session was held to discuss Tree and Shrub mitigation issues. One of the outcomes of the work session was that Staff should make recommendations to the Commissioner with the portfolio regarding next steps for cases where the Company has made multiple efforts but has had less than satisfactory results with their tree and shrub mitigation efforts. The case discussed below provides an example of a case where the Company planted trees and shrubs multiple times but has not been successful in achieving a 75 percent survival rate.

Recommendation: Find that Allete, Inc. has made good faith efforts to grow replacement trees and shrubs in Case No. PU-09-587 and should not have to continue with further shrub and tree mitigation/reporting efforts.

Background:

In this case, Allete constructed approximately 22 miles of 230 kV Transmission Line in South Central North Dakota to serve as a generator outlet for the Bison 1 Wind Project in Oliver and Morton Counties.

On September 6, 2011, the Company filed a tree and shrub mitigation plan applicable to both the Bison 1 Wind Project (PU-09-151) and the associated transmission line. The Company stated that during construction it removed 376 trees and shrubs. The Company decided to do a 3:1 planting resulting in the planting of 1128 trees and shrubs to ensure better survivability. The trees and shrubs were planted in the spring of 2011 and checked in the fall of 2011. The Company reported that it had greater than 100 percent survivability because of using the 3:1 ratio. In the Company's 2012 and 2013 reports, they stated that the trees and tall shrubs still showed greater than 100 percent survivability but that they would be replanting low shrubs again as part of their mitigation efforts for the Bison 3 (PU-11-162) Project. As a result, the Company planted 127 trees

and 990 shrubs in 2013. In the fall of 2013 and 2014, the Company reported good survivability. In the Company's 2015 fall report, it indicated that it believed the shrub survivability requirements had been met.

Because of the combined plantings and lack of detail beyond the terms trees and tall shrubs versus low shrubs, it has been difficult to track the Company's progress. However, in light of the Company's efforts to ensure survivability by initially planting a 3:1 ratio and its additional plants, the Company has worked to meet the Commission's requirements.