STATE OF NORTH DAKOTA

PUBLIC SERVICE COMMISSION

Case No. PU-09-670

IN THE MATTER OF THE APPLICATION OF MINNKOTA POWER COOPERATIVE, INC., FOR A CERTIFICATE OF CORRIDOR COMPATIBILITY AND ROUTE PERMIT TO CONSTRUCT THE CENTER TO GRAND FORKS 345 kV TRANSMISSION LINE PROJECT IN OLIVER, MCLEAN, BURLEIGH, SHERIDAN, WELLS, EDDY, FOSTER, GRIGGS, STEELE, NELSON, AND GRAND FORKS COUNTIES, NORTH DAKOTA

AFFIDAVIT OF BRIAN HUNKER

STATE OF MINNESOTA)
) ss.
COUNTY OF HENNEPIN)

Brian Hunker, being first duly sworn upon oath, states and alleges as follows:

1. I am employed by HDR Engineering, Inc. (HDR), which has been retained by Minnkota Power Cooperative, Inc. (Minnkota), as the environmental consulting firm for the Center, North Dakota to Grand Forks, North Dakota 345 kV Transmission Line Project (Project), which is the subject of the above-captioned action.

2. I am the Environmental Consulting Project Manager for Minnkota's Project. In that role, I manage the environmental technical staff that conducts environmental field surveys, oversee the preparation of environmental reports and permit applications, and assist with agency consultations.

3. Minnkota is proposing a corridor and route modification in the NW/4 of Section 13 and the NE/4 of Section 14, Township 143 North, Range 80 West, in McLean County, North Dakota, to accommodate the landowner's route alignment adjustment request.

4. HDR, on behalf of Minnkota, has completed a Class III Cultural Resource Inventory of the proposed corridor and route modification, and no cultural resources were identified during the survey. Copies of the Class III Cultural Resource Inventory Report, as well as the State Historical Society of North Dakota, State Historic Preservation Office's concurrence letter, are attached hereto as **Exhibit A**.

5. Minnkota considered the exclusion area, avoidance area, selection, and policy criteria set forth in Sections 69-06-08-02(1)-(4) of the North Dakota Administrative Code when selecting the proposed corridor and route modification. An analysis of those criteria, as they relate to the proposed corridor and route modification, is provided in Tables 1-4 in the attached **Exhibit B**. A map depicting the location of exclusion and avoidance areas in relation to the proposed corridor and route modification is provided as Exhibit 1 to the Affidavit of Michael Hennes (Hennes Aff.).

6. No exclusion areas, as set forth in Section 69-06-08-02(1) of the North Dakota Administrative Code, are located within the proposed corridor and route modification. *See* Exhibits A and B; *see also* Hennes Aff., Exh. 1.

7. With the exception of rural water pipelines, which may be present but are not anticipated to be impacted, no avoidance areas are located within the proposed corridor and route modification. *See* Exhibits A and B; *see also* Hennes Aff., Exh. 1.

8. Clearing the right-of-way within the modified portion of the Project route outside of avian breeding and nesting seasons will enable Minnkota to minimize or avoid potential impacts to avian species.

FURTHER AFFIANT SAYETH NOT.

Brian Hunker

Subscribed and sworn to before me
this 18th day of September, 2012.

Notary Public

JUANITA R. NAMANNY
NOTARY PUBLIC-MINNESOTA
My Commission Expires Jan. 31, 2015

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STATE HISTORICAL SOCIETY OF NORTH DAKOTA

August 23, 2012

Mr. Dennis Rankin
Environmental Protection Specialist
Engineering and Environmental Staff
Rural Development-Rural Utilities Service
United States Department of Agriculture
1400 Independence Avenue SW
Mail Stop 1571 Room 2244
Washington, DC 20250-1571

NDSHPO REF.: 10-0173h USDA-RUS/PSC Center to Grand Forks 345 kV Transmission Line Project: Two addendum reports "Class III Intensive Archaeological Resources Inventory Center to Grand Forks 345 kV Line Supplemental Addendum 3 – Appendix 2" and "Class III Intensive Archaeological Resources Inventory Center to Grand Forks 345 kV Line Supplemental Addendum 3 – Appendix 1"

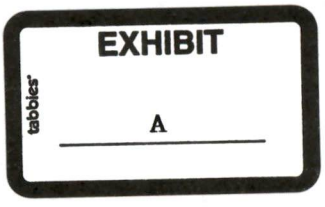
Dear Mr. Rankin:

We reviewed correspondence and documentation for NDSHPO REF.: 10-0173h USDA-RUS/PSC Center to Grand Forks 345 kV Transmission Line Project: Two addendum reports as detailed above. We concur with your *"No Historic Properties Affected"* determination provided the project is of the nature stated and that it takes in the locations plotted in the report addendums. We also look forward to the final cumulative report on this activity as discussed in teleconference call on April 26, 2012. In accordance with the executed Programmatic Agreement (PA), a phased approach to identification, evaluation, and mitigation is acceptable. Thank you for the opportunity to review the project, and we look forward to further consultation and to the review of (outstanding) project documentation on it. If you have questions please contact either Susan Quinnell at (701) 328-3576 or squinnell@nd.gov

Sincerely,

Merlan E. Paaverud, Jr.
State Historic Preservation Officer (North Dakota) and
Director, State Historical Society of North Dakota

c: Dennis Rankin, RUS, Washington, DC
c: Barry G. Williams, USFWS, Bismarck
c: Patrick Fahn, ND PSC, Bismarck
c: Brian Hunker, HDR Engineering



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Memo

To:	Dennis Rankin USDA Rural Utilities Service		
From:	Erika Eigenberger and Michelle Porwoll	Project:	Center to Grand Forks 345kV Transmission Line
cc:	Laura Dean, John Graves, Mike Hennes, and Brian Hunker		
Date:	August 2, 2012	Job No:	186001 Task 004 Department 164

Re: Class III Intensive Archaeological Resources Inventory Center to Grand Forks 345kV Line Supplemental Addendum 3 - Appendix 2

Introduction

Minnkota Power Cooperative, Inc., (Minnkota) proposes to build a 250-mile-long, 345-kilovolt (kV) Transmission Line (Project) from the Center 345-kV Substation, near Center, North Dakota, to the Prairie Substation, just west of Grand Forks (Figure 1). The U.S. Department of Agriculture Rural Utilities Service (RUS) is considering a request for funding. RUS has determined that the Project requires consultation under Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, and its implementing regulations (36 Code of Federal Regulations [CFR] Part 800). Section 106 requires federal agencies to consider the effects of undertakings within their jurisdictions on properties listed, or eligible for listing, on the National Register of Historic Places (NRHP). The Project also requires consideration of cultural resources under Section 101(b) of the National Environmental Policy Act (NEPA). RUS must complete an environmental analysis and prepare an Environmental Assessment (EA) in accordance with its Environmental Policy and Procedures for Implementing the National Environmental Policy Act (7 CFR Part 1794) before the proposed Project can be considered for financing. The draft EA was published in November 2010, prior to the completion of historic property identification studies. However, a Programmatic Agreement among the consulting parties, which includes the RUS, State Historical Society of North Dakota (SHSND), the U.S. Fish and Wildlife Service (USFWS) and Minnkota, details the specific project concerns relating to historic property identification, possible adverse effects, and treatment of historic properties.

Methods

The previous Class I inventory (HDR Engineering, Inc., 2010) provided useful information on where known sites were located, gave an indication of where previous investigations were concentrated, and which areas lacked systematic study. RUS specifies that the regulations require a good faith effort to identify historic properties and that this does not equate with identifying every possible archaeological site on the landscape. RUS contends that previous years of archaeological research have given us a fairly good idea of where on the landscape important archeological sites may be concentrated. In September 2010, at the request of Minnkota and RUS, HDR developed an initial predictive model (Justin and

Eigenberger 2011) to statistically illustrate areas of precontact archaeological site probability across the preferred alignment.

HDR has been implementing a program of intensive field work to test the model within the project corridor, to locate buried and near-surface archaeological and cultural sites within the 150-ft project right-of-way (ROW), and to guide field work as refinements in project planning identify new project areas that warrant field examinations. Field methods included pedestrian survey and shovel testing.

Pedestrian survey employed transects spaced at no greater than 15-meter (m) intervals. When surface features or artifacts were identified, additional transects were surveyed at 5 or 10 m intervals, depending on the ground surface visibility. When found, cultural materials were recorded and photographed, and GPS coordinates were collected for future mapping. Pedestrian survey also identified additional areas where subsurface testing would be recommended. These areas were recorded and photographed, and GPS coordinates were collected and added to field maps.

Subsurface testing, or shovel testing, was used in high probability areas and where the ground surface was obscured by vegetation. Shovel tests were spaced at intervals no greater than 15 m and followed the center of the transmission line corridor, or the natural landform when appropriate, to properly test the area. Tests were excavated to a maximum depth of 100 centimeters (cm), or until either a buried C horizon or two culturally sterile soil strata were encountered. All excavated soils were passed through a ¼ inch mesh hardware cloth. Artifacts identified during shovel testing were recorded, photographed if diagnostic, placed in plastic bags, and reburied at the approximate level found in the test. UTM coordinates were recorded with a Trimble GPS unit for later mapping.

Data gathered during the survey were recorded on shovel test forms and in the field notebook of the principal investigator. Items noted included the location of survey areas and individual shovel tests, the depth of each shovel test and its associated soil profile, the presence or absence of cultural materials within each test, and the excavated soil texture, inclusions, and Munsell color.

In addition, Areas of Avoidance, or features that cannot be assigned definitive cultural affiliation, were recorded during the survey. Areas of Avoidance include stone piles and alignments (likely associated with Euro-American field clearing activities), depressions, and earthen formations (such as earthen berms or field clearing piles). Areas of Avoidance were identified in the field and assigned feature numbers, however, these areas are not considered archaeological sites and will not receive an official North Dakota State Site number. Although cultural affiliation cannot be determined, it is HDR's opinion that these areas should be avoided by construction activities. Areas of Avoidance are listed with the associated Survey Segment and/or Laydown Area.

For a complete description of the Predictive Model, the Area of Potential Effects, the methods utilized for the Field Survey, and the Collection Policy, please refer to the *Class III Intensive Archaeological Resources Inventory Center to Grand Forks 345kV Line* report (Justin and Eigenberger 2011), the *Class III Intensive Archaeological Resources Inventory Center to Grand Forks 345kV Line Supplemental Addendum 1* (Justin and Eigenberger 2012a), the *Class III Intensive Archaeological Resources Inventory Center to Grand Forks 345kV Line Supplemental Addendum 2* (Justin and Eigenberger 2012b), the *Class III Intensive Archaeological Resources Inventory Center to Grand Forks 345kV Line Supplemental Addendum 3* (Eigenberger and Porwoll 2012a) and the *Class III Intensive Archaeological Resources Inventory Center to Grand Forks 345kV Line Supplemental Addendum 3 - Appendix 1* (Eigenberger and Porwoll 2012b).

Results of Investigations

Summary

Due to the size of the Project and multiple layout changes, this Class III archaeological survey was conducted over multiple mobilizations from October 3 to November 18, 2010, and from May 16 to July 1, 2011. The survey for the Class III Addendum 1 was conducted from October 31 to November 7, November 16 to 19, and December 9, 2011, and January 4 to 5, 2012.

HDR subcontracted the pedestrian survey for the Class III Addendum 2, to Kadrmas, Lee & Jackson (KLJ). The pedestrian survey was conducted February 6, 2012, by Duane Klinner and February 7, 2012, by Brian O'Donnchadha. Fieldwork for the Class III Addendum 4 was completed by KLJ on February 21, 2012, and by HDR from April 11 to April 20, 2012.

Fieldwork for the Class III Addendum 3 was completed from April 2 to 6, 2012, and included areas that were scheduled for shovel testing and could not be completed due to frozen ground and Project route changes/shifts extending beyond the original 150-ft ROW.

Fieldwork for the Class III Addendum 3 – Appendix 1 was completed on June 13, 2012, and included testing on parcels where landowner permission had been revoked.

Fieldwork for this Class III Addendum 3 – Appendix 2 was completed on July 23, 2012, and included the survey of one project re-route (Survey Segment JJJ), the expansion Laydown Areas B1 and C1, and the addition of one new laydown area (A1). Survey methods for the Class III Addendum 3 – Appendix 2 included desktop review and pedestrian survey. Survey Segments and Laydown Areas are addressed separately from west to east.

No cultural materials were identified during the fieldwork completed for the Class III Intensive Archaeological Resources Inventory Center to Grand Forks 345kV Line Supplemental Addendum 3 – Appendix 2.

Survey Segment Coverage

McLean County

Township 143N, Range 80W, Sections 13 and 14

Survey Segment JJJ

Survey Segment JJJ begins near the middle of Section 14 and extends approximately 0.90 miles northeast, transecting the northeast quarter of Section 14 and the northwest quarter of Section 15 (Figure 2, Page 2). The landscape is gently rolling and includes planted wheat and small strips of grassland adjacent to wetlands and drainages. The southwestern portion of JJJ in Section 14 appears disturbed, as many gravel piles and pits were noted during the pedestrian survey. According to the Final Center to Grand Forks Archaeological Predictive Model (FCGFAPM), Survey Segment JJJ is within a high probability zone.

Pedestrian survey of Survey Segment JJJ was conducted along four transects spaced at 15 m intervals. Visibility in the planted wheat was good, at 25 to 50 between rows. Visibility in the grassland areas was poor, at 0 percent, however multiple gopher mounds were available for examination. No cultural materials were identified within the survey segment and no areas were recommended for shovel

testing. In addition, four Areas of Avoidance (Euro-American stone piles) were identified in Section 14, and two Areas of Avoidance (Euro-American stone piles) were identified in Section 13.

Laydown Areas

Oliver County

Township 142N, Range 84W, Section 22

New Laydown Area A1

New Laydown Area A1 covers approximately 10 acres and is located in the southeast quarter of Section 22, at the intersection of ND-41 and 9th Avenue SW (Figure 2, Page 1). The laydown area is within an existing staging area that has been graded and graveled. This staging area was developed at an earlier date, independent of the Project.

Multiple vehicles, machine parts, metal debris, and one standing shed were noted on site during the visit. As New Laydown Area A1 is approximately five miles from the project ROW, it was not included in the FCGFAPM. However, due to ground disturbance the area is considered to have a low potential for cultural materials.

Pedestrian survey was not completed at New Laydown Area A1. Instead the area was photographed and previous disturbance was documented. No cultural materials were identified during the photo documentation and no areas were recommended for shovel testing. No further work is recommended.

Laydown Area B1

Currently, Laydown Area B1 covers approximately 20 acres and is located in the southeast quarter of Section 25, near the intersection of ND-41 and 409th Avenue NE (Figure 2, Page 3). During the pedestrian survey, the exact boundary of the laydown area was unknown, therefore, an additional 10 acres was surveyed to provide more flexibility for planning. A total of 30 acres were surveyed at Laydown Area B1. The laydown area is within a planted wheat field and cornfield in gently rolling topography. According to the FCGFAPM, Laydown Area B1 is within both moderate and high probability zones.

Pedestrian survey of Laydown Area B1 was completed at 15 m intervals. Ground surface visibility was good, at 50 to 75 percent. No cultural materials were identified, and no areas were recommended for shovel testing. No further work is recommended.

Laydown Area C1

Laydown Area C1 covers approximately 20 acres and is located in the northwest quarter to Section 36, near the intersection of ND-3 and 13th Street NE (Figure 2, Page 4). Over the course of the Project, three variations of Laydown Area C1 have been reviewed, all with negative results. Land use includes a cultivated field and according to the FCGFAPM, Laydown Area C1 is a low probability zone.

Since the area is within a low probability zone and multiple variations of the laydown area were previously surveyed, it was determined that additional pedestrian survey was not needed and a desktop review would suffice. No further work is recommended at Laydown Area C1.

Identified Sites

No cultural materials were identified during the fieldwork completed for the Class III Intensive Archaeological Resources Inventory Center to Grand Forks 345kV Line Supplemental Addendum 3 – Appendix 2.

Conclusions and Recommendations

This report is provided to RUS to assist with its responsibilities for compliance with Section 106 of the NHPA, as amended (36 CFR 800).

During the survey, six Areas of Avoidance (or features that can not be assigned definitive cultural affiliation) were recorded. Areas of Avoidance are assigned feature numbers; however, these areas are not considered archaeological sites and will not receive official North Dakota State Site numbers. It is HDR's opinion that these areas should be avoided by construction activities. Therefore, these areas will be flagged prior to construction activities and avoided by the construction crew.

No archaeological sites were identified during the survey for the Class III Intensive Archaeological Resources Inventory Supplemental Addendum 3 – Appendix 2. HDR recommends that construction activities proceed in these areas without further cultural resource considerations.

References

Eigenberger, Erika and Michelle Porwoll. 2012a. *Class III Intensive Archaeological Resources Inventory Center to Grand Forks 345 kV Line Supplemental Addendum 3*. Final report prepared for Minnkota Power.

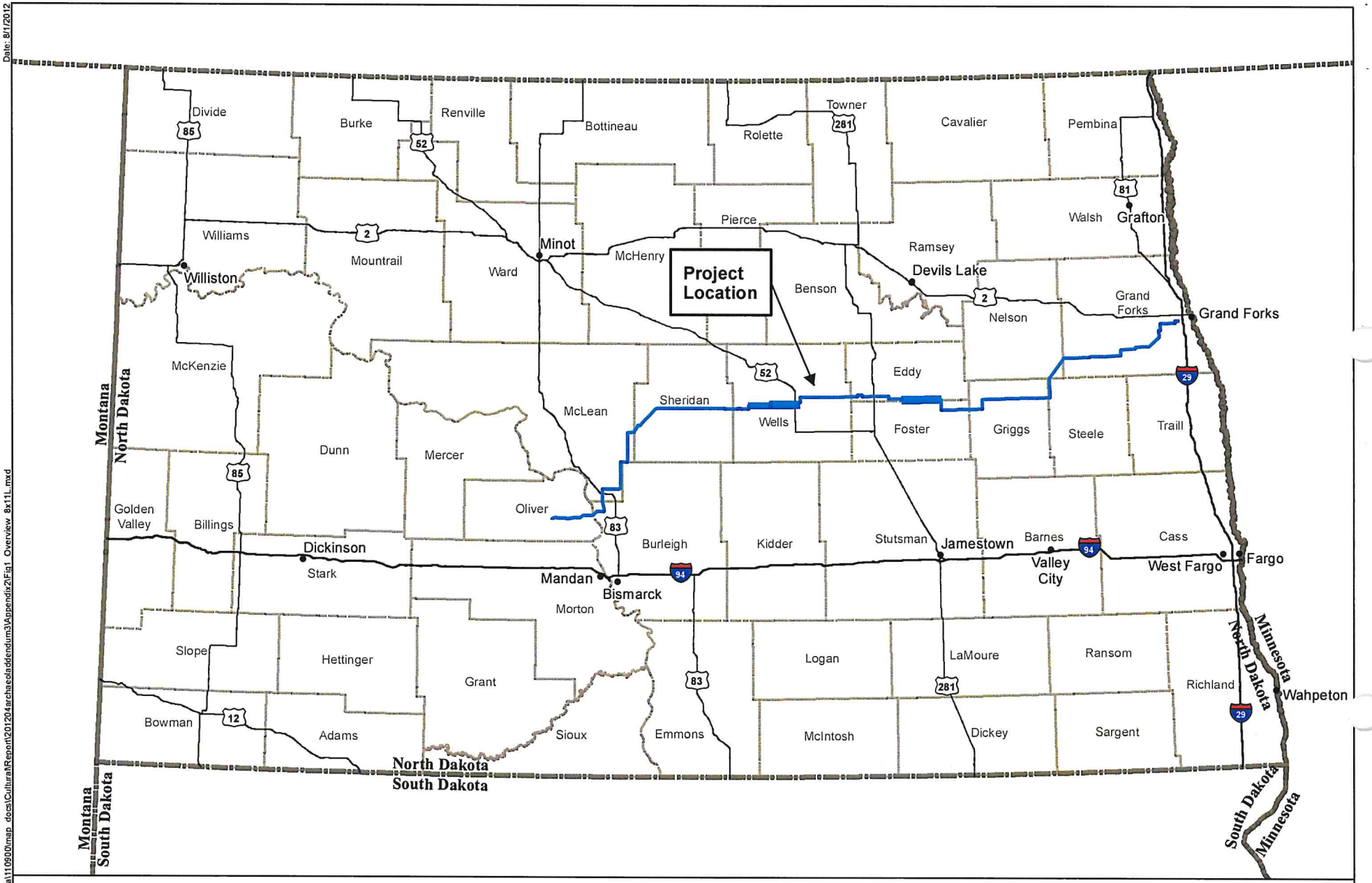
Eigenberger, Erika and Michelle Porwoll. 2012b. *Class III Intensive Archaeological Resources Inventory Center to Grand Forks 345 kV Line Supplemental Addendum 3 – Appendix 1*. Final report prepared for Minnkota Power.

HDR Engineering, Inc. 2010. *Class I Literature Search Proposed Minnkota Power Cooperative, Inc. Center to Grand Forks 345 kV Line*. Report prepared for Minnkota Power.

Justin, Michael and Erika Eigenberger. 2011. *Class III Intensive Archaeological Resources Inventory Center to Grand Forks 345 kV Line*. Final report prepared for Minnkota Power.

Justin, Michael and Erika Eigenberger. 2012a. *Class III Intensive Archaeological Resources Inventory Center to Grand Forks 345kV Line Supplemental Addendum 1.* Final report prepared for Minnkota Power.

Justin, Michael and Erika Eigenberger. 2012b. *Class III Intensive Archaeological Resources Inventory Center to Grand Forks 345kV Line Supplemental Addendum 2.* Final report prepared for Minnkota Power.



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Project Corridor

Figure 1
Project Location
Center to Grand Forks Project
Minnkota Power Cooperative, Inc.

Date: 8/1/2012

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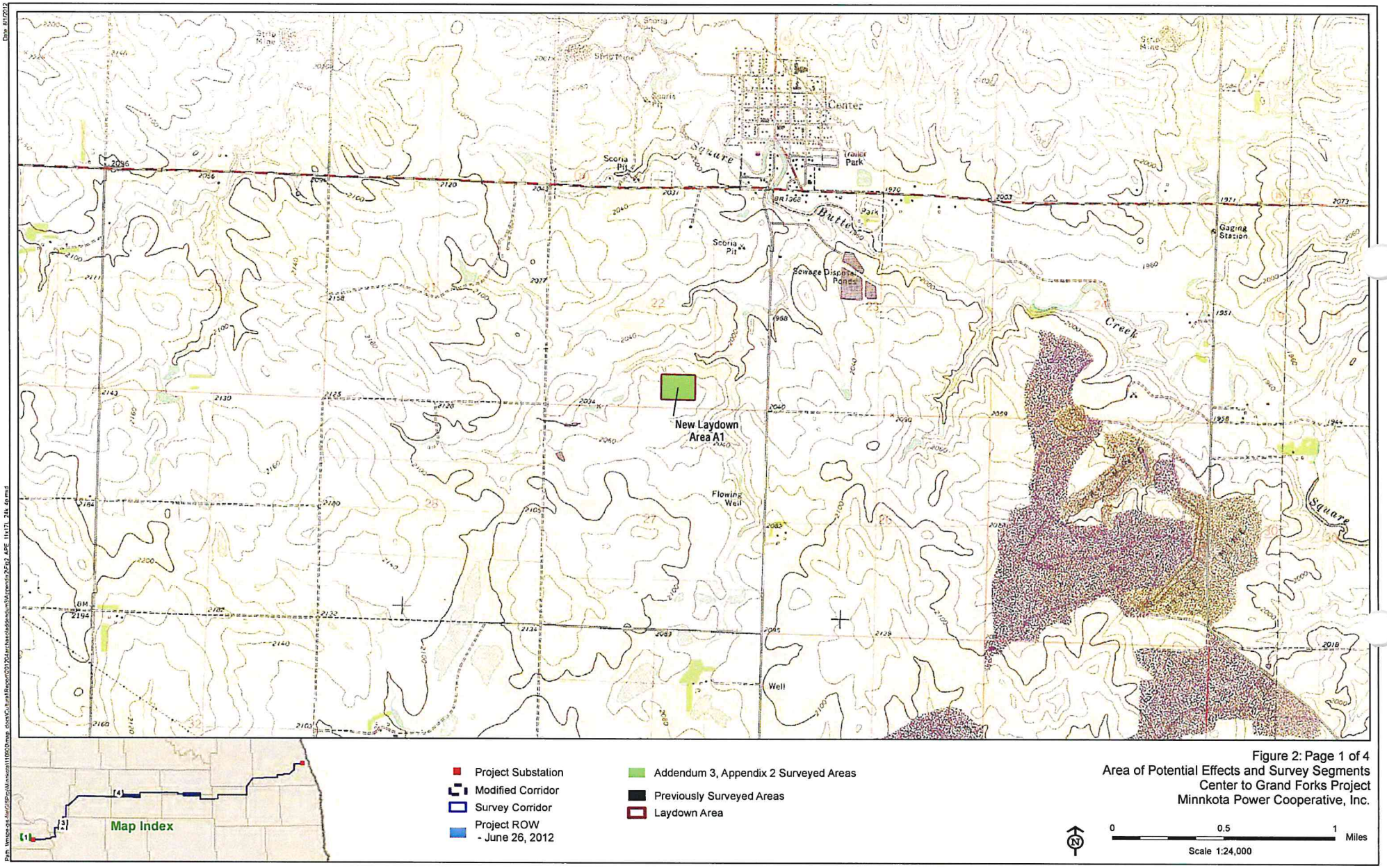

Figure 2: Page 1 of 4
Area of Potential Effects and Survey Segments
Center to Grand Forks Project
Minnkota Power Cooperative, Inc.

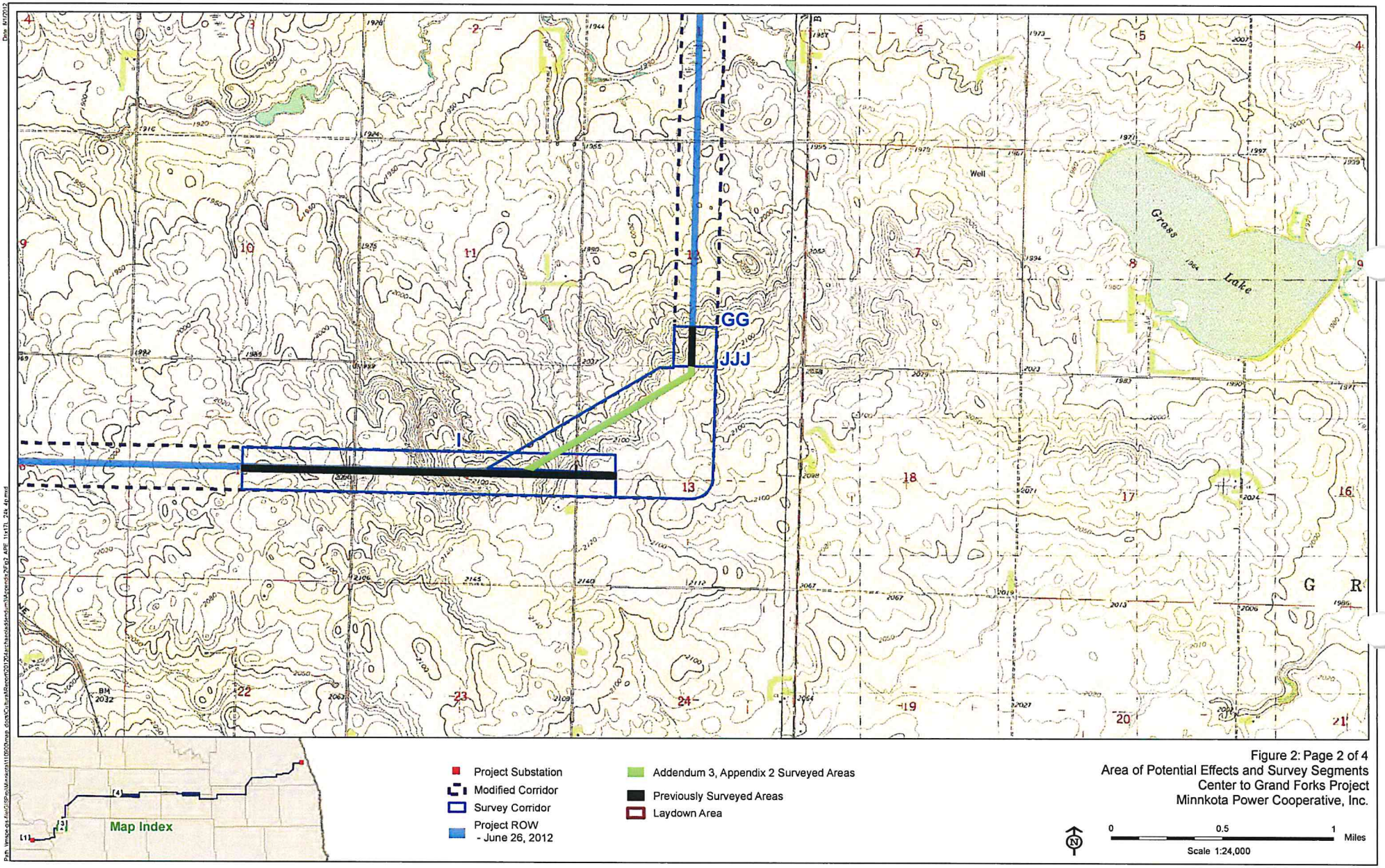

Figure 2: Page 2 of 4
Area of Potential Effects and Survey Segments
Center to Grand Forks Project
Minnkota Power Cooperative, Inc.

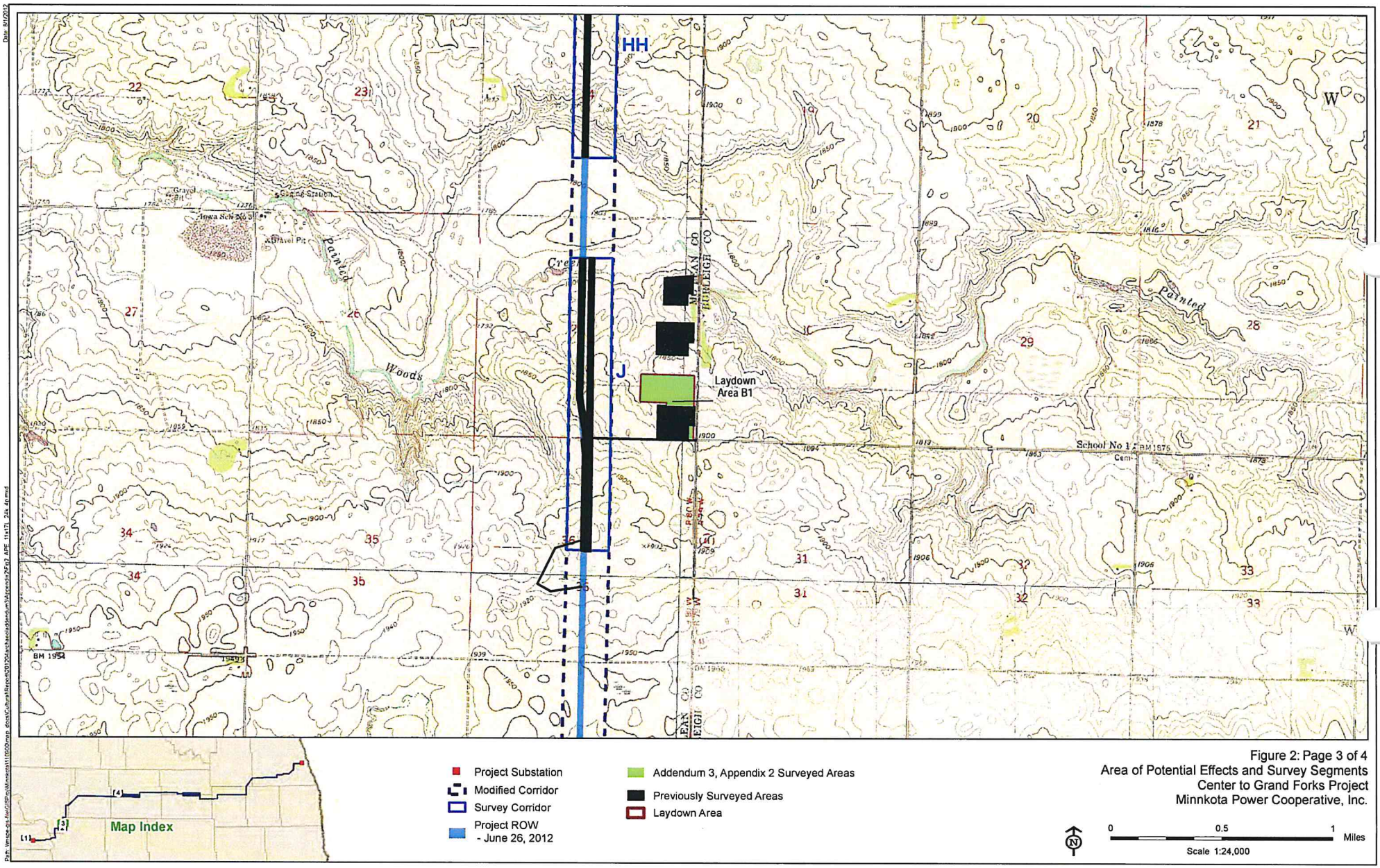

Figure 2: Page 3 of 4
Area of Potential Effects and Survey Segments
Center to Grand Forks Project
Minnkota Power Cooperative, Inc.

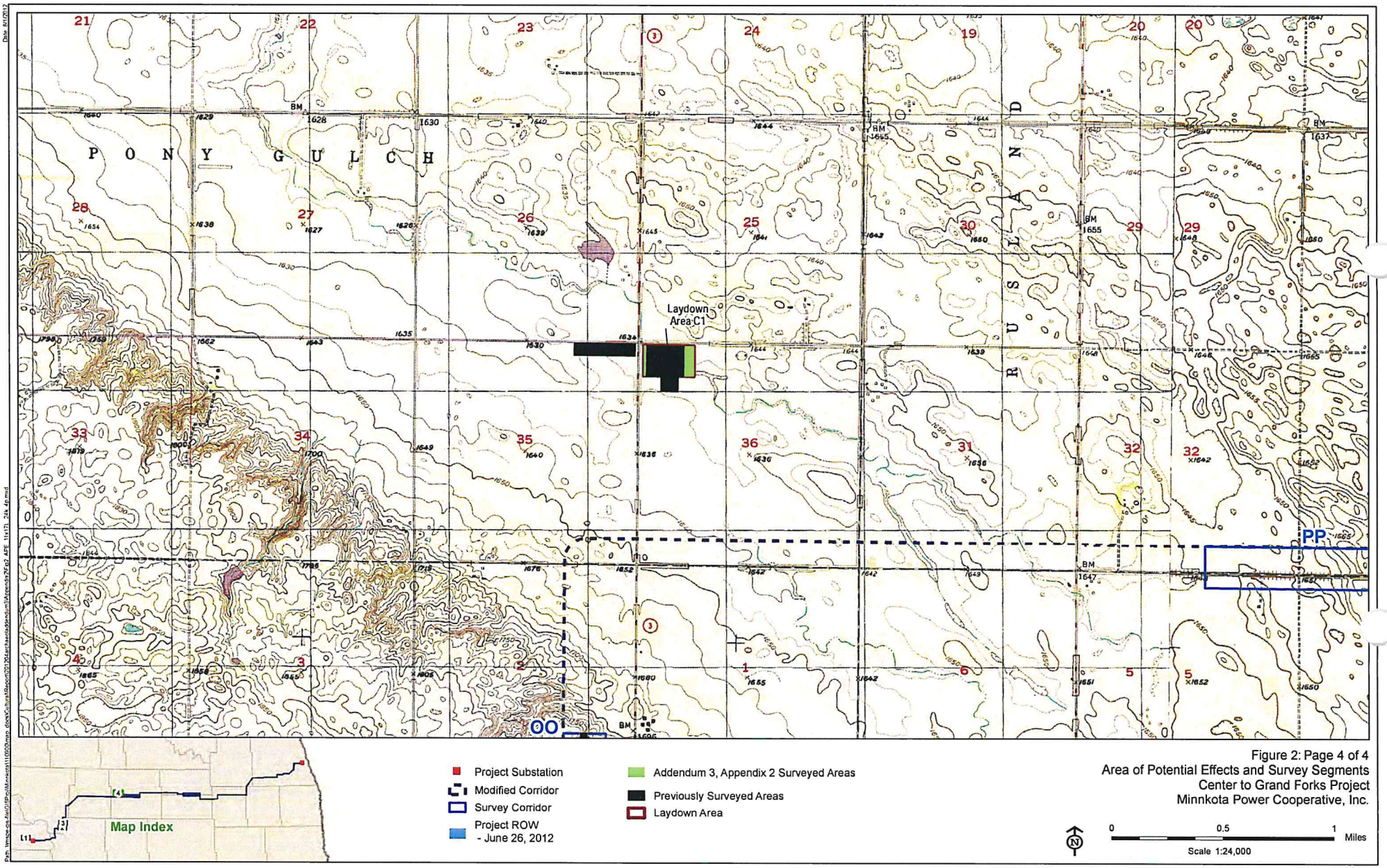

Figure 2: Page 4 of 4
Area of Potential Effects and Survey Segments
Center to Grand Forks Project
Minnkota Power Cooperative, Inc.

EXHIBIT B

Table 1. Exclusion Areas – Corridor and Route Modification

Geographic Area	Present within Modification	Proposed Buffer
Designated or registered national: parks; memorial parks; historic sites and landmarks; natural landmarks; monuments; and wilderness areas	Not present within corridor or route modification.	No impacts are anticipated and no buffer is proposed.
Designated or registered state: parks; historic sites; monuments; historical markers; archaeological sites; and nature preserves	Not present within corridor or route modification.	No impacts are anticipated and no buffer is proposed.
County parks and recreational areas; municipal parks; and parks owned or administered by other governmental subdivisions	Not present within corridor or route modification.	No impacts are anticipated and no buffer is proposed.
Areas critical to the life stages of threatened or endangered animal or plant species	Not present within corridor or route modification.	No impacts are anticipated and no buffer is proposed.
Areas where animal or plant species that are unique or rare to this state would be irreversibly damaged	Not present within corridor or route modification.	No impacts are anticipated and no buffer is proposed.

Table 2. Avoidance Areas – Corridor and Route Modification

Avoidance Area	Present within Modification	Proposed Buffer
Designated or registered national: historic districts; wildlife areas; wild, scenic or recreational rivers; wildlife refuges; and grasslands	Not present within corridor or route modification.	No impacts are anticipated and no buffer is proposed.
Designated or registered state: wild, scenic, or recreational rivers; game refuges; game management areas; management areas; forests; forest management lands; and grasslands	Not present within corridor or route modification.	No impacts are anticipated and no buffer is proposed.
Historical resources which are not specifically designated as exclusion or avoidance areas	Not present within corridor or route modification.	No impacts are anticipated and no buffer is proposed.
Areas that are geologically unstable	Not present within corridor or route modification.	No impacts are anticipated and no buffer is proposed.
Within 500 feet of a residence, school, or place of business	Not present within corridor or route modification.	No impacts are anticipated and no buffer is proposed.
Reservoirs and municipal water supplies	Not present within corridor or route modification.	No impacts are anticipated and no buffer is proposed.
Water sources for organized rural water districts	Rural water pipelines may potentially be present.	No impacts are anticipated and no buffer is proposed.
Irrigated land.	Not present within corridor or route modification.	No impacts are anticipated and no buffer is proposed.

Avoidance Area	Present within Modification	Proposed Buffer
Areas of recreational significance which are not designated as exclusion areas	Not present within corridor or route modification.	No impacts are anticipated and no buffer is proposed.

Table 3. Selection Criteria – Corridor and Route Modification

Selection Criteria	Potential Adverse Effects
The impact upon agriculture:	
Agricultural production	Permanent impacts will occur as a result of structure placement and reduced tillage in cropland; impacts are approximately 78.5 square feet per structure. Temporary construction impacts such as soil compaction and crop damage will likely occur; approximately 2,827 square feet per structure. Minnkota will work with the landowner to minimize impacts to land.
Family farms and ranches	Minnkota will work with the landowner to minimize impacts to land and farming and/or ranching operations.
Land which the owner can demonstrate has soil, topography, drainage, and an available water supply that cause the land to be economically suitable for irrigation	No irrigated lands are present within the modification. It is likely land economically suitable for irrigation is present within the route; however, Minnkota will work with the landowner to minimize impacts to land.
Surface drainage patterns and ground water flow patterns	No impacts are anticipated to rivers, streams, or drainageways. The removal of soil and groundwater at each structure location is not anticipated to impact local groundwater flow patterns due to the temporary and small-scale nature of the removal. To minimize impacts during construction, a National Pollutant Discharge Elimination System (NPDES) permit and a Storm Water Pollution Prevention Plan (SWPPP) have been prepared and a Notice of Intent (NOI) submitted to the North Dakota Department of Health. The Project will follow the sediment and erosion control best management practices (BMPs) outlined in the SWPPP.
The impact upon:	
Noise-sensitive land uses	Nearby homes may experience short-term effects during construction such as elevated noise levels and increased vehicle traffic. However, no noise impacts are anticipated during Project operation.
The visual effect on the adjacent area	The transmission line will be visible to individuals traveling on adjacent roads and to residences and landowners that live close to the transmission line and substations.
Extractive and storage resources	One previously used gravel pit is located within the Project corridor modification. The route modification does not cross this gravel pit area and impacts will be avoided.

Selection Criteria	Potential Adverse Effects
Wetlands, woodlands, and wooded areas	No wetlands or waterbodies within the proposed corridor and route modification will be permanently impacted by the Project. No tree stands are located within the route modification. Areas containing shrubs of buffalo berry and Russian olive are located within the route modification and will be cleared prior to construction. These areas will be inventoried and if the ground is disturbed where the shrubs cannot regenerate naturally, they will be replaced per the Project's replacement plan.
Radio and television reception and other communication or electronic control facilities	No communication towers are located in the modification. No impacts anticipated.
Human health and safety	Once construction is complete, the transmission line will span all roads and therefore will not impede emergency services. Minnkota conducted an analysis of electric and magnetic field (EMF) calculated levels for the Project (reference the Certificate of Corridor Compatibility application public hearing Exhibit No. 11). Results of the analysis show that calculated EMF levels for maximum operating conditions and normal operating conditions are below published guidelines. Minnkota will design the Project to meet National Electric Safety Code (NESC) standards. Safety concerns related to electric fields are sufficiently addressed by adherence to the NESC. No additional mitigation is required or anticipated.
Animal health and safety	No impacts to livestock are anticipated. Impacts to wildlife populations are expected to be minimal. Potential avian collisions may occur, but are anticipated to be relatively small. Minnkota has committed to marking the shield wires in select areas and designing the line and structures per APLIC guidelines.
Plant life	The Project area is primarily agricultural in nature. Permanent impacts to plant life will occur at structure locations and areas of tree clearing. Areas of temporary construction impacts will be restored. Impacts to individual trees would be replaced at a ratio of 2:1.

Table 4. Policy Criteria – Corridor and Route Modification

Policy Criteria	Suitable Policy or Practice of Applicant
Location and design	Minnkota's policy is to locate and design to minimize environmental impacts and utilize existing corridors.
Training and utilization of available labor in this state for the general and specialized skills required	Minnkota has discussed with construction contractors the use of local labor and will compile a listing of available local labor for use during construction.
Economies of construction and operation	Minnkota is utilizing specialty contractors with proven experience in large transmission projects. Economy is obtained by originating and terminating into existing jointly owned substation facilities.
Use of citizen coordinating committees	Minnkota is coordinating with the owner of property at issue to site the transmission line. A citizen coordinating committee is not necessary.

Policy Criteria	Suitable Policy or Practice of Applicant
A commitment of a portion of the transmitted product for use in this state	Energy transmitted by the Project will be used in Minnkota's service territory, which includes North Dakota.
Labor relations	No labor relations will be affected.
Coordination of facilities	Minnkota has coordinated and will continue to coordinate with area utilities regarding the location of the facilities to maximize benefits and minimize duplication of efforts.
Monitoring of impacts	Minnkota will monitor BMPs utilized during construction to minimize environmental impacts and will monitor construction compliance with the commitments made in its applications to the Commission and applicable permit conditions, including the Commission's Order.
Utilization of existing and proposed rights-of-way and corridors	One of the primary goals in locating the corridor was to maximize use of existing rights-of-way, corridors, and field breaks, to the extent practical.
Other existing or proposed transmission facilities	Paralleling opportunities were utilized to the extent practical.

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