



October 29, 2021

Steve Kahl
Executive Director
North Dakota Public Service Commission
600 East Boulevard; Department 408
Bismarck, ND 58505-0480

Re: PU-11-696 - Basin Electric Power Cooperative - 345 kV Transmission Line - Mercer,
Dunn, and McKenzie Counties

AND

PU-14-813 - Basin Electric Power Cooperative - North Killdeer Loop Phase I 345-kV
Transmission Line

Dear Mr. Kahl:

The purpose of this letter is to provide a final report regarding Basin Electric Power Cooperative's (**Basin Electric's**) tree and shrub replacement efforts for the Antelope Valley Station to Neset 345-kV and North Killdeer Loop Phase I 345-kV Transmission Line Projects (**Projects**) and to request that tree and shrub mitigation efforts for Case No. PU-11-696 and Case No. PU-14-813 be deemed complete. The tree and shrub replacement efforts for the two transmission lines were combined because the Projects were occurring contemporaneously and in the same general area. In September 2021, the North Dakota Public Service Commission (**PSC**) approved Basin Electric's request to comply with the PSC's updated (March 2019) Tree and Shrub Mitigation Specifications.

The initial tree and shrub replacement plan for the project was approved by the PSC in 2017 and included planting plans for an estimated 4,192 trees and shrubs at Hoffland Bay in Williams County and the City of Stanley in Mountrail County. An update to the plan was approved by the PSC in 2018, amounting to an estimated 17,463 trees and shrubs, including a Pheasants Forever planting in Williams County, North Dakota Game and Fish Department (**NDGF**) plantings at Beulah Mine and Harmony Lake in Mercer County, and several North Dakota Department of Transportation (**NDDoT**) plantings in Stark County. The approved plan also included an estimated 11,224 trees and shrubs to be replaced on individual landowner parcels.

The Williams and Mercer County plantings occurred in 2018, while the Stark County plantings occurred during 2019. The Stark County planting included an additional NDGF planting of approximately 3,250 trees and shrubs at the Raab Wildlife Management Area. Landowner plantings were also completed.

Table 1 provides details on the number, year, and type (public or landowner) of plantings completed. It should be noted that plantings are typically adjusted for field conditions, i.e., there are either a few more or few less plantings than the estimates included in the tree and shrub planting plan updates previously approved by the PSC.

Table 1. Tree and shrub summary.

County	Public Plantings	Landowner Plantings	Planting Dates (Year)	Notes
McKenzie	0	7,117	2017, 2018, 2019	1,606 replants 2018/2019
Mercer	4,529	2,194	2016, 2018, 2021	1 new landowner planting and 892 replants in 2021
Mountrail	622	0	2018	City of Stanley Park
Stark	16,540	0	2019	1,000 replants 2020 and 2,000 replants 2021
Williams	5,097	1,513	2017, 2018, 2019	1,750 replants 2021
Totals	26,788	10,824		

As shown in Table 1 above, a total of approximately 37,612 trees and shrubs have been planted on behalf of the Projects, while a minimum of 37,078 were required at a 2:1 replacement ratio. County Soil Conservation Districts (SCDs) have conducted survivability monitoring and replanting efforts since the initial plantings. As noted above, approximately 1,606 replants were completed in McKenzie County during 2018 and 2019 and 1,000 replants were completed in Stark County in 2020. Replants in 2021 included approximately 2,000 in Stark County, 1,750 for the NDGF Hoffland Bay planting in Williams County, and 892 replants in Mercer County. One additional small landowner planting, amounting to 65 trees and shrubs, was also completed in Mercer County during 2021.

Table 2 below illustrates the estimated survival rate for plantings by county. County SCDs have conducted fall survivability inspections which in turn drive the following year's replanting efforts. Even with the drought conditions experienced over much of North Dakota during 2021, survival percentages are fairly high, due to the replanting efforts in previous years.

Table 2. Tree and Shrub Survival Information

County	Public Plantings	Landowner Plantings	Totals	2021 Survival Rate
McKenzie	0	7,117	7,117	84.3%
Mercer	4,529	2,194	6,723	90.8%
Mountrail	622	0	662	80.0%
Stark	16,540	0	16,540	85.7%
Williams	5,097	1,513	6,610	72.8%
Totals	26,788	10,824	37,612	84.0%

Basin Electric believes the significant planting (and replanting) efforts undertaken since 2017 would meet the intent of and purpose of the NDPSC's updated Tree and Shrub Mitigation Specifications. Landowner plantings totaling 10,824 provide local beautification, wind and visual

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screening, and wildlife habitat. Public planting including those for the City of Stanley, NDGF, NDDoT, Pheasants Forever and others have enhanced the local landscape and have provided wildlife habitat. Further, Basin Electric has a commitment with the NDFG to complete additional replants at Hoffland Bay in future years if needed. Basin Electric believes its tree and shrub mitigation efforts have provided a long-term benefit to landowners, farmers and ranchers, the community, wildlife, and the environment. Finally, the overall survival rate for 2021 is approximately 84.0%, which speaks to Basin Electric's efforts to maintain and enhance the original plantings. We request that tree and shrub mitigation efforts for Case No. PU-11-696 and Case No. PU-14-813 be deemed complete.

Please contact me at ksolie@bepc.com or 701.202.5096 if you have any questions or require additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kevin L. Solie".

Kevin L. Solie, P.E.
Senior Environmental Compliance Administrator

/kls

cc: Casey Jacobson