



October 31, 2019

Steve Kahl
Director of Administration/Executive Secretary
North Dakota Public Service Commission
600 East Boulevard, Dept. 408
Bismarck, ND 58505-0480

**RE: Montana-Dakota Utilities Co. / Otter Tail Power Company 345KV Transmission Line –
Dickey County Siting Application.
Case No. PU-13-840
Summary of Tree and Shrub Mitigation Plan**

Dear Mr. Kahl:

Otter Tail Power Company and Montana-Dakota Utilities Co. (Applicants) provide the following summary of the tree and shrub mitigation plan in support of the July 10, 2014 Order, and the Supplemental Orders dated December 16, 2015 and November 29, 2017, granting Certificate of Corridor Compatibility No. 154 and Route Permit No. 166 (together with the Findings of Fact, Conclusion of Law, and Order, hereinafter referred to as the Order) by the North Dakota Public Service Commission (Commission).

On November 20, 2018, the Applicants filed Supporting Documents for the Certificate of Corridor Compatibility and Route Permit. The filing included the Natural Resources Conservation Service's (NRCS) October 5, 2018, email with the Commission. The NRCS email reported the Big Stone South to Ellendale Project's (Project) tree planting site had poor survival with about 40 percent of the trees surviving. In June 2018, the NRCS replanted trees. At that time, it was the NRCS's recommendation to install fencing around the trees to protect them from deer and rabbit browse. Following the recommendation, in the fall 2018, the Applicants installed fencing around the trees. Photos of the fenced trees was filed with the Commission on November 20, 2018.

In June 2019, Otter Tail Power Company reviewed the tree planting site and reported that only four trees survived. Subsequently, the Applicants requested the NRCS to replant trees, which they were unable to replant due to saturated soils, flooding in Dickey County that took resources, and lack of available growing season after the site dried. The NRCS plans to perform a third planting in the spring 2020.

In spring 2020, the NRCS will replant the site. If the August 5, 2019, application is approved, the Applicants will follow the new tree mitigation rules and the Applicants will monitor the planting site and file a report two years after the planting.

At the suggestion of Commission Staff, the Applicants included a Request Use of New Tree and Shrub Mitigation Specifications in the August 5, 2019, Application for a Modified Certificate of Corridor Compatibility. The request to use new tree and shrub mitigation specifications is intended to comport with more recent mitigation plans.

If you have any questions regarding this filing, please contact me at 218-739-8607 or pbeithon@otpc.com.

Sincerely,

/s/PETE BEITHON

Pete Beithon
Manager, Regulatory Recovery
Otter Tail Power Company

By electronic filing and U.S. mail
cc: Dickey County Auditor's Office
c/o Bev Kuska
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