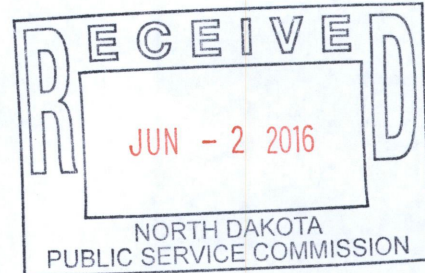


**STATE OF NORTH DAKOTA
PUBLIC SERVICE COMMISSION**

INFORMAL COMPLAINT

June 1, 2016

Oliver County,
Complainant-Petitioner,
v
Minnkota Power Cooperative, Inc.,
Respondent.



Executive Secretary
Public Service Commission
State Capitol
Bismarck, ND 58505-0480

Dear Executive Secretary:

This Informal Complaint is filed pursuant to the provisions of N.D. Admin. Code §69-02-02-01, on behalf of Oliver County ("County"), by the Board of County Commissioners of Oliver County, with representation by the Oliver County State's Attorney, John Mahoney.

Basis of Complaint

Minnkota Power Cooperative, Inc. (MPC) placed towers for a new 345-kilovolt transmission line along and parallel to about two miles of a County road approximately 33 feet from the centerline of the road, in violation of North Dakota law and without approval of the County. The County seeks an order requiring MPC to relocate the towers to appropriate setbacks.

Facts and Law

In about 2011, MPC was in the process of obtaining a transmission facility permit from the PSC, pursuant to N.D. Admin. Code Art. 69-02, for the proposed construction of a 345-kilovolt transmission line. The proposed line was to extend from MPC's electrical generation plant near Center, in Oliver County, easterly through Oliver County and ultimately to the eastern edge of North Dakota near Grand Forks. The permit was eventually granted by the PSC, and construction of the transmission line was completed in about mid 2014.

The County Commissioners were greatly alarmed to see that the towers for the transmission line were installed only 33 feet from the center line along about two miles of a County road. Specifically, these towers were placed on the south side of the east-west County road between sections 29 and 32 and sections 28 and 33, T142N-R82W, in Oliver County. The towers are literally in the ditch and the arms extend over the travelled roadway.

N.D.C.C. § 24-01-42 states as follows:

Construction of utility facility - Limitation. No person, firm, or association may construct any electrical supply or communication line, gas, oil, or water, or other pipeline parallel to and within one hundred feet [30.48 meters] of the centerline of any state highway right of way or within seventy-five feet [22.86 meters] of the centerline of any county highway right of way without first obtaining the consent of the director or board of county commissioners except that such prohibition does not apply to highways or streets located within areas platted as townsites or additions and subdivisions thereof.

MPC did not obtain the consent of the Oliver County Board of County Commissioners as required by N.D.C.C. § 24-01-42 before constructing this portion of the transmission line with far less than the seventy-five foot setback.

Further, it is clear that North Dakota law requires that an applicant comply with local land use and zoning rules, regulations, and ordinances in order to be issued a transmission facility construction permit. N.D.C.C. § 49-22-16(2) states that:

“A permit for the construction of a transmission facility within a designated corridor may supersede and preempt any local land use, zoning, or building rules, regulations, or ordinances upon a finding by the commission that such rules, regulations, or ordinances, as applied to the proposed route, are unreasonably restrictive in view of existing technology, factors of cost or economics, or needs of consumers regardless of their location. Without such a finding by the commission, no route shall be designated which violates local land use, zoning, or building rules, regulations, or ordinances.”

(N.D.C.C. § 49-22-16(2), *emphasis added*)

To the best of the County's knowledge, no finding was ever made by the PSC that the local (Oliver County) zoning "rules, regulations, or ordinances, as applied to the proposed route" were in any way "unreasonably restrictive".

MPC did obtain a conditional use permit through the local Oliver County Planning and Zoning Board and County Commission. However, the application and map submitted by Minnkota and approved by the County depicted that the proposed transmission line in this two mile stretch would be between 136 and 223 feet south of the section line (see Affidavit of John Wicklund, with accompanying Exhibit 1, attached hereto and made a part hereof by reference).

The County is gravely concerned for the safety of the residents of Oliver County and general travelling public. Since the discovery of the placement of the transmission line on the two miles of County road, the County Commissioners have met several times with MPC officials in an effort to find a resolution. MPC has offered no substantial reason as to why the transmission lines were placed as they were, contrary to North Dakota law and without the required approval of the County. The best MPC could offer was that it ran into difficulty with landowners in obtaining easements for this area. Thus it appears that MPC's decision was based entirely on economic considerations.

Economic considerations alone should not be a sufficient basis for violating state law and Administrative Rules with respect to routing of transmission lines. In fact, with regard to certain "avoidance areas", N.D. Admin. Code §69-02-08-02 specifically states that "[e]conomic considerations alone will not justify approval of these areas." Likewise, economic considerations should not serve as an excuse for ignoring the mandates of state law and administrative regulations. Indeed, MPC is empowered to exercise eminent domain, and, if necessary, could have asserted this authority to obtain a route with appropriate setbacks for these two miles.

In its discussions with the County, MPC has argued that the towers in the ditches along this 55 mph County road do not present a safety hazard. However, this assertion is contradicted by MPC's own literature. In an attachment to its County Permit Application it is stated that a 150 foot right of way is needed for this transmission line, with 75 feet on each side of the structures. (see Affidavit of John Wicklund, attachment to Exhibit 1, "*How Much ROW is Needed?*") This is obviously far broader than 33 feet setback that was actually used in the construction. It requires very little scientific analysis to conclude that this

alignment presents obvious hazards that would not be present with a 75 foot setback, not only from the virtually immovable tower structures in the immediate ditch, but also from the danger of falling ice and/or wires onto the travelled portion of the roadway.

Prayer for Relief

In reviewing the *Statement of Policy for the Energy Conversion and Transmission Facility Siting Act* (N.D.C.C. Chapter 49-22), it is clear that the lawmakers intended this Chapter to prevent situations such as this:

Statement of policy. The legislative assembly finds that the construction of energy conversion facilities and transmission facilities affects the environment and the welfare of the citizens of this state. Therefore, it is necessary to ensure that the location, construction, and operation of energy conversion facilities and transmission facilities will produce minimal adverse effects on the environment and upon the welfare of the citizens of this state by providing that no energy conversion facility or transmission facility shall be located, constructed, and operated within this state without a certificate of site compatibility or a route permit acquired pursuant to this chapter. The legislative assembly hereby declares it to be the policy of this state to site energy conversion facilities and to route transmission facilities in an orderly manner compatible with environmental preservation and the efficient use of resources. In accordance with this policy, sites and routes shall be chosen which minimize adverse human and environmental impact while ensuring continuing system reliability and integrity and ensuring that energy needs are met and fulfilled in an orderly and timely fashion.

N.D.C.C. §49-22-02 (*emphasis added*)

Pursuant to N.D.C.C. Chapter 49-22, the PSC is authorized to revoke or suspend a permit after it is issued. In particular, N.D.C.C. § 49-22-20 provides that a permit for the construction of a transmission facility may be revoked or suspended for:

1. Any material false statement in the application or in accompanying statements or studies required of the applicant.
2. Failure to comply with the certificate or permit or any terms, conditions, or modifications contained therein.
3. Violation of the provisions of this chapter or rules or regulations issued pursuant to this chapter by the commission.

4. A determination by a district court pursuant to section 49-22-16.1.
(Emphasis added)

MPC made material false statements in its application by representing to the PSC that it had obtained approval of the local zoning authority of the County to place the transmission line 33 feet from the centerline of the County road.

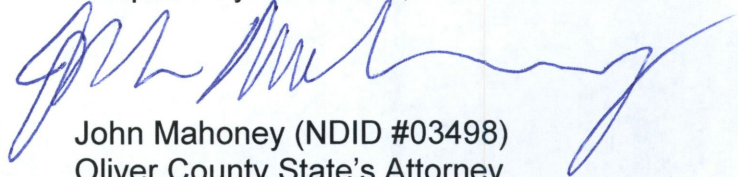
Further, pursuant to N.D.C.C. § 49-22-21(4), the PSC “may, by injunctive procedure, without bond or other undertaking, proceed against any person who willfully engages in any conduct described in subsection 3.” Subsections 3(b.) and 3(c.) include this authority for the following violations:

- b. Constructs, operates, or maintains an energy conversion facility or a transmission facility other than in compliance with the certificate or permit and any terms, conditions, or modifications contained therein.
- c. Violates any provision of this chapter or any rule adopted by the commission pursuant to this chapter.

MPC constructed its transmission facility other than in compliance with the permit and terms or conditions, in that it did not obtain approval of its route from the local zoning authority. It clearly violated the provisions of the Chapter 49-22 requiring the prior local zoning approval. Also, MPC blatantly violated state law with regard to setbacks of transmission lines.

The County respectfully requests that the PSC conduct a thorough investigation of this Complaint, and, upon a finding of violations, suspend the permit and assert injunctive relief requiring MPC to relocate its transmission lines to appropriate setbacks on the two miles of Oliver County road.

Respectfully Submitted,



John Mahoney (NDID #03498)
Oliver County State's Attorney
P.O. Box 382
Center, ND 58530
john@mahoney-legal.com

Attorney for Complainant/Petitioner

Commissioners. I did not become aware of the fact MPC was building the line 33 feet from the section line until it was well into construction. I have attached copies of my file from this matter as "Exhibit 1".

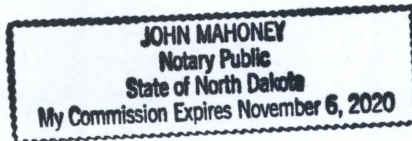
FURTHER SAYETH AFFIANT NOT.

Dated at Center, North Dakota, this 26th day of May, 2016.

John Wicklund
John Wicklund

Subscribed and sworn to before me this 26th day of May, 2016 by John Wicklund.

[Signature]
Notary Public



Subj: **Minnkota Power Co. Center - Grand Forks Transmission Line Conditional Use Permit**
Date: 12/6/2010 11:21:04 A.M. Central Standard Time
From: StonePadmani@stanleygroup.com
To: jjrw2492@aol.com

Greetings, John.

Minnkota Power Company & Stanley Consultants, Inc. representatives met with the Oliver County Commissioners' October 7th. I'm following up to confirm the process and forms needed to meet Oliver County's permitting requirements.

Barb Fleming referred me to you as Oliver County's Land Use Administrator.

Are these the steps we take?

1. We submit the Oliver County Conditional Use Permit to you 3 weeks prior to the monthly Planning & Zoning Committee Meeting (last Thursday of each month). You publish the notice in the newspaper 2 weeks prior to the meeting.
2. We appear at the Planning & Zoning Committee Meeting to answer questions.
3. After the Planning & Zoning Committee has recommended approval, we appear before the County Commissioners (1st Tuesday of each month).

Thank you for your kind assistance in this matter.

Best regards,

Padmani Stone
Administrative Assistant
Stanley Consultants, Inc.
8000 S Chester St, Ste 500
Centennial, CO 80112
303.649.7823
stonepadmani@stanleygroup.com

June 27, 2011

John Wicklund
Oliver County Planning and Zoning
Oliver County Courthouse
115 West Main, PO Box 188
Center, ND 58530-0188

RE: – Minnkota Power Conditional Use Permit Application

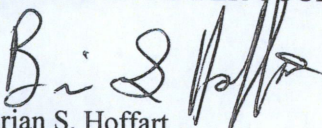
Dear Mr. Wicklund:

Minnkota Power Cooperative, Inc. (MPC) is in the design stage for the construction and operation of a 345-kilovolt (kV) transmission line from Center to Grand Forks, North Dakota. The proposed line is currently being proposed to be on property in Oliver County. I have enclosed a Conditional Use Permit, ten route maps, a list of land owners along the route, and a project detail packet for your review.

Also, if Oliver County has a Conditional Use Permit application fee, please let us know. We appreciate your help and cooperation in this matter. If you have any concerns or questions, please don't hesitate to call me at 701-795-4354.

Regards,

MINNKOTA POWER COOPERATIVE, INC.


Brian S. Hoffart
Right of Way Agent

Enclosures

OLIVER COUNTY

PERMIT NO. 626

- BUILDING PERMIT
- OCCUPANCY PERMIT
- CONDITIONAL USE PERMIT
- TEMPORARY USE PERMIT
- OUTDOOR ADVERTISING PERMIT

GRANTED TO: Minnkota Power
(APPLICANT)

FOR: 345 Kv Power Line
(USE)

LOCATION: See File

With the understanding that the applicant will satisfy all conditions set forth in the Oliver County Zoning Ordinance and the applicant will satisfy any additional conditions deemed necessary by the Board of County Commissioners. Failure of the applicant to comply with these conditions will constitute a violation of the ordinance under section 18 and all penalties under section 18.3 apply..

ISSUED BY D. Steine Helmer DATE: 8-4-11
(COUNTY COMMISSIONER)

RECEIVED BY: _____ DATE: _____
(APPLICANT SIGNATURE)

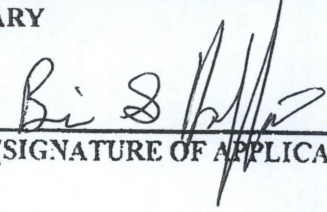
COMMENTS: Fee \$75⁰⁰ + 5⁰⁰/Acre over 10 Acres

#626

OLIVER COUNTY: CONDITIONAL USE PERMIT APPLICATION

- 1. **NAME OF APPLICANT:** MINNKOTA POWER COOPERATIVE, INC.
- 2. **MAILING ADDRESS:** P.O. BOX 13200 GRAND FORKS, ND 58208-3200
- 3. **TELEPHONE NUMBER:** 701-795-4354
- 4. **PROPERTY IS LOCATED IN SECTION** , **TOWNSHIP** ,
RANGE **AND CONTAINS** **ACRES.** SEE ATTACHED MAP
- 5. **CONDITIONAL USE REQUESTED:** THE CONSTRUCTION AND OPERATION
OF A 345-KILOVOLT (KV) TRANSMISSION LINE FROM CENTER TO GRAND FORKS, ND.
- 6. **PRESENT LAND USE:** AGRICULTURAL
- 7. **PROPOSED LAND USE:** AGRICULTURAL
- 8. **ADJACENT LANDOWNERS** **DESCRIPTION**
SEE ATTACHED SPREADSHEET _____

- 9. **ADDITIONAL INFORMATION (TO BE ATTACHED)**
 - A. MAP OF THE AREA
 - B. BOUNDARY LINE SURVEY OR ACCURATE PLAT OF SITE
 - C. DESCRIPTION OF SURROUNDING AREA
 - D. PRELIMINARY MAP SHOWING LOCATION OF STRUCTURES TO BE DEVELOPED ON THE SITE AND DISTANCES BETWEEN STRUCTURES
 - E. TOPOGRAPHICAL MAP IN FIVE (5) FOOT CONTOURS OF SITE
 - F. GENERAL SOILS OF THE SITE
 - G. LOCATION OF EXISTING UTILITIES AND PROPOSED UTILITY EXTENSIONS AND/OR ALTERATIONS
 - H. PARKING PLAN SHOWING OFF-STREET PARKING AREAS, LOADING AREAS AND/OR TRANSFER STATIONS
 - I. A TIMING SCHEDULE INDICATING ANTICIPATED STARTING AND COMPLETION DATES OF THE SITE
 - J. WRITTEN APPROVAL OF RESPECTIVE HIGHWAY AUTHORITY FOR NEW ACCESS ROADS AND/OR APPROACHES
 - K. ANY ADDITIONAL INFORMATION THE PLANNING AND ZONING COMMISSION DEEMS NECESSARY



 (SIGNATURE OF APPLICANT)

June 20, 2012

John Wicklund
Oliver County Planning and Zoning
Oliver County Courthouse
115 West Main, PO Box 188
Center, ND 58530-0188

RE: Minnkota Power Building Permit Application

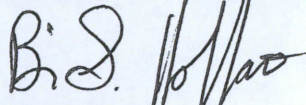
Dear Mr. Wicklund:

Minnkota Power Cooperative, Inc. (MPC) is in the design stage for the construction and operation of a 345-kilovolt (kV) transmission line from Center to Grand Forks, North Dakota. The proposed line is currently being proposed to be on property in Oliver County. I have enclosed a Building Permit Application, route map, a list of land owners along the route, a project detail packet for your review, a building permit calculation spreadsheet for .01% of construction, and a building permit check in the amount of \$10,169.40.

We appreciate your help and cooperation in this matter. We look forward to receiving the final Conditional Use Permit and Building Permit. If you have any concerns or questions, please don't hesitate to call me at 701-795-4354.

Regards,

MINNKOTA POWER COOPERATIVE, INC.



Brian S. Hoffart
Right of Way Agent

Enclosures

DATE: Jun 14, 2012

VENDOR NAME OLIVER COUNTY TREASURER

INVOICE NO	INVOICE DATE	DESCRIPTION	DISCOUNT AMOUNT	NET AMOUNT
06/07/2012	Jun 7, 2012		0.00	10,169.40

PLEASE DETACH AND RETAIN THIS STATEMENT AS YOUR RECORD OF PAYMENT.

Thank You

0.00	10,169.40
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REORDER SERIES 300

THIS CHECK IS VOID WITHOUT A SECURITY BACKGROUND AND A SIGNATURE BORDER PRINTED IN A HEAT SENSITIVE INK THAT DISAPPEARS WHEN RUBBED.

No. 620534

CHECK DATE	CHECK NUMBER	CHECK AMOUNT
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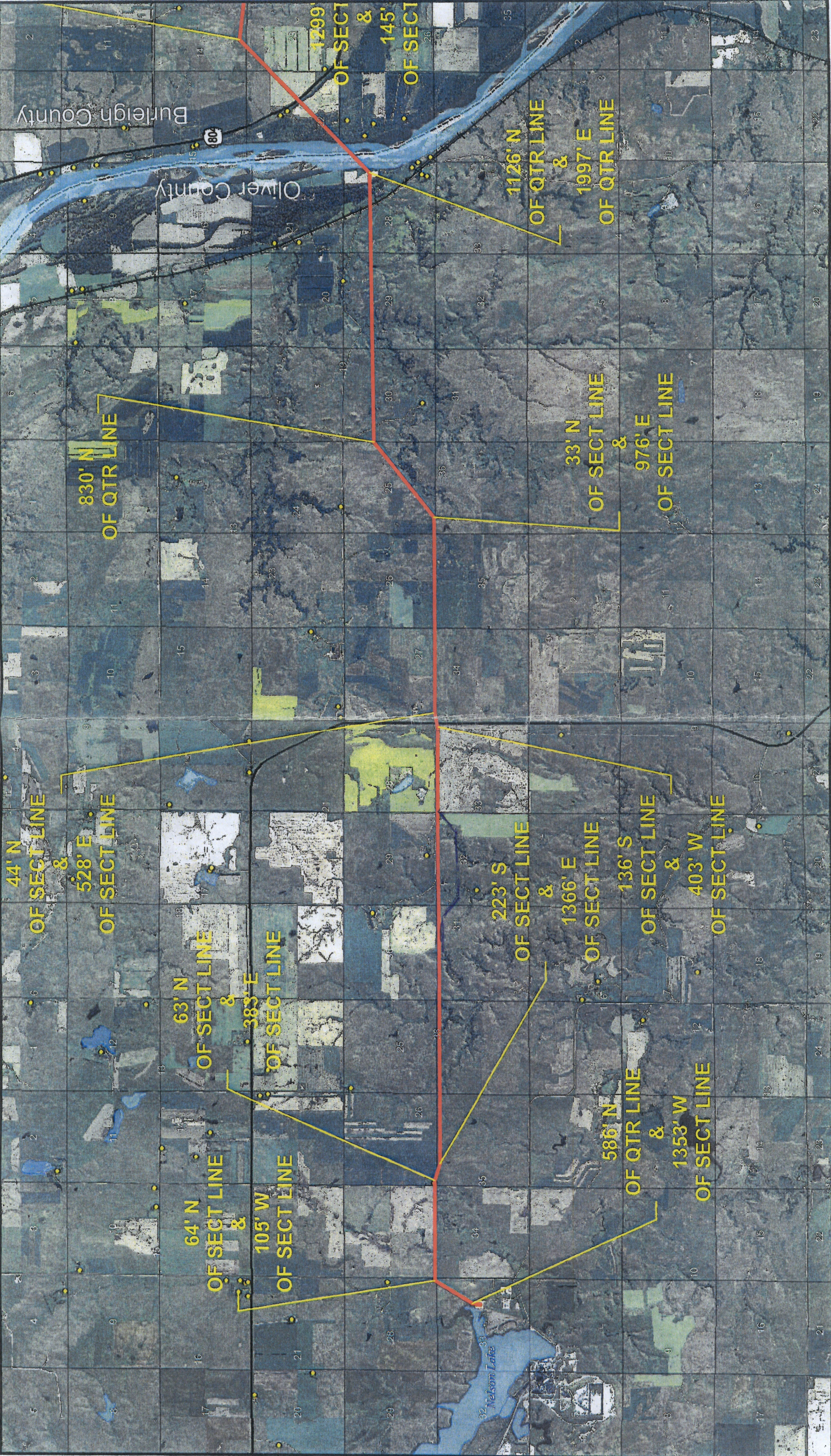
Jun 14, 2012 620534 \$*****10,169.40

PAY Ten Thousand One Hundred Sixty-Nine Dollars And Forty Cents*****

TO THE ORDER OF
 OLIVER COUNTY TREASURER
 AUDITOR
 PO BOX 188
 CENTER ND 58530

Robert M. L.
Ray E. Spulman

SIGNATURE AREA HAS A DISAPPEARING BORDER - CHECK BORDER CONTAINS MICROPRINTING

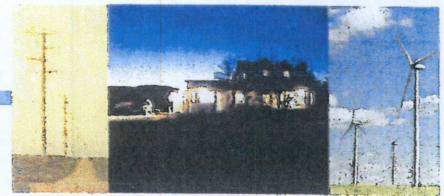


Oliver County - Property Owners

Owner	Legal	Section	Township	Range	Street	City	State	Zip
Minnkota Power	E1/2	33	142	83	PO Box 13200	Grand Forks	ND	58208
Minnkota Power	SE1/4	28	142	83	PO Box 13200	Grand Forks	ND	58208
Dale Barth	S1/2	27	142	83	2255 33rd Ave SW	Center	ND	58530
ND Game and Fish	NE1/4	34	142	83	100 North Bismarck Expw	Bismarck	ND	58501
Minnkota Power	Small Parcel SW1/4	26	142	83	PO Box 13200	Grand Forks	ND	58208
Larry Doll & Ann Doll	SW1/4 Except tract	26	142	83	3155 49th Ave NW	New Salem	ND	58540
Loren Schwalbe ETAL	SE1/4	26	142	83	3115 25th St	Center	ND	58530
Loren Schwalbe ETAL	N1/2	35	142	83	3115 25th St	Center	ND	58530
Larry Doll	S1/2	25	142	83	3155 49th Ave NW	New Salem	ND	58540
ND State Land Deprt	N1/2	36	142	83	1707 North 9th Street	Bismarck	ND	58506
Kenneth Johnson, Residuary Trust	N1/2	31	142	82	Box 343	Center	ND	58530
Jerry Weber	S1/2	30	142	82	2241 29th Ave SW	Center	ND	58530
Kenneth Johnson, Residuary Trust	SW1/4	29	142	82	Box 343	Center	ND	58530
Jacquelyn Schulte	SE1/4	29	142	82	PO Box 356	Center	ND	58530
Kenneth Johnson, Residuary Trust	NW1/4 Less Part	32	142	82	Box 343	Center	ND	58530
Jerry Weber	NE1/4 & Part of NW1/4	32	142	82	2241 29th Ave SW	Center	ND	58530
Jerry Weber	SW1/4SW1/4	28	142	82	2241 29th Ave SW	Center	ND	58530
Douglas Price	SE1/4SW1/4 & SE1/4	28	142	82	2566 9th ST SW	Center	ND	58530
Price Brothers Ranch	N1/2	33	142	82	2564 9th St SW	Hensler	ND	58530
Randall Schmidt	SW1/4	27	142	82	4817 Roughrider Circle W	Mandan	ND	58554
Frank Himmelspach	SE1/4	27	142	82	2506 South Acanthus	Mesa	AZ	85209
Diocese of Bismarck - Chruch of Annunciation	Parcel in NW1/4	34	142	82	7520 University Drive	Bismarck	ND	58504
Raymond Kautzman	NW1/4 Less Part	34	142	82	1200 2nd Avenue NW	Mandan	ND	58554
Raymond Kautzman	NE1/4	34	142	82	1200 2nd Avenue NW	Mandan	ND	58554
Joseph Schmidt	S1/2	26	142	82	3581 22nd ST SW	Center	ND	58530
Joseph Schmidt	N1/2	35	142	82	3581 22nd ST SW	Center	ND	58530
Joseph Schmidt	SW1/4 & S1/2SE1/4	25	142	82	3581 22nd ST SW	Center	ND	58530
Bruce Nelson	N1/2SE1/4	25	142	82	2360 22nd ST SW	Hensler	ND	58530
John Jr. Wicklund	NE1/4	25	142	82	1700 Four Oaks Rd #233	Eagan	MN	55121
Bair Farm	N1/2	36	142	82	901 3rd St NW	Mandan	ND	58554
Bruce Nelson	N1/2	30	142	81	2360 22nd ST SW	Hensler	ND	58530

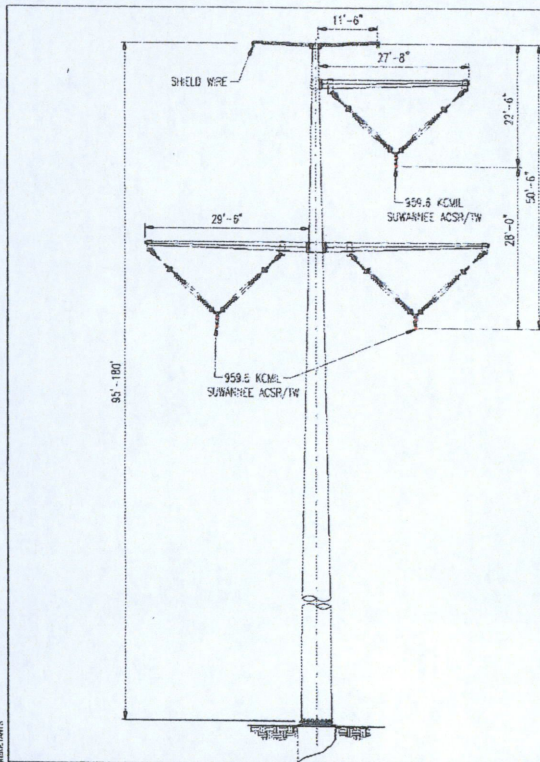
Center to Grand Forks Project

Minnkota Power
MPC COOPERATIVE, INC.



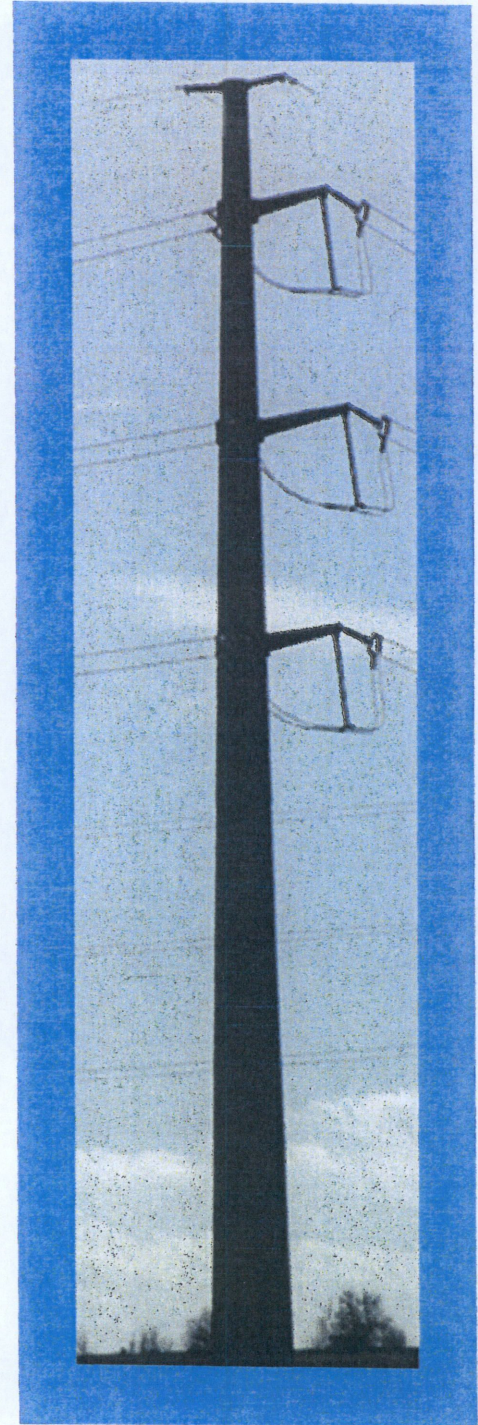
Structure Statistics

- Single-pole; self-supporting design
- Self-weathering steel structure
- Average height: 130-150 feet
- Average span (distance between structures): 1,000 feet
- Ground clearance beneath
- Conductor: 35-40 feet
- Concrete footing depth: 30-40 feet
- Concrete footing diameter: 7-10 feet
- Structures require no guy wires



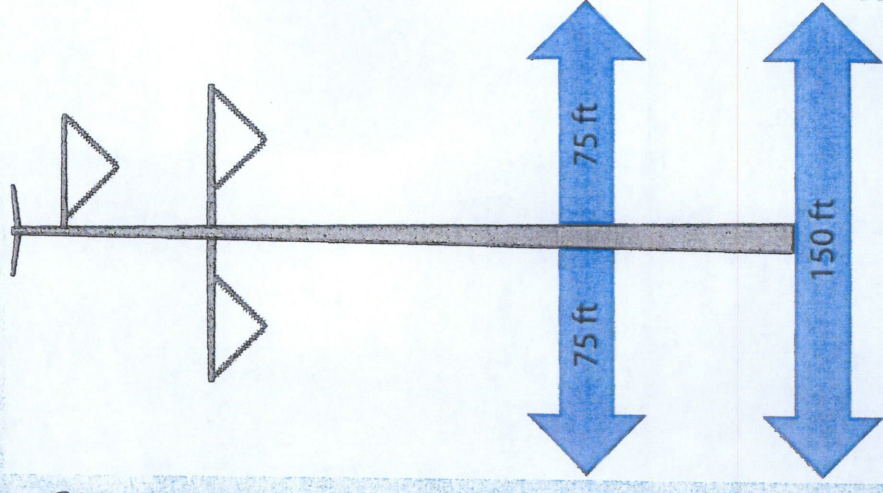
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 © STANLEY CONSULTANTS

DESIGNED	DISCH	CHKD	APVD	DATE	9000 South Chester Street, Suite 500 Centennial, Colorado 80112 www.stanleyconsultants.com
DRAWN					
CHECKED	B. CAMPBELL				MINNKOTA POWER COOPERATIVE, INC. GRAND FORKS, N.D.
APPROVED					CGF TRANSMISSION LINE 345KV, SINGLE CIRCUIT, TANGENT (PRELIMINARY)
DATE					SCALE: NTS NO. 21906 TAN2_A REV. A



How Much ROW Is Needed?

- A 150-foot-wide permanent right of way
- 75 feet on each side of the structure
- Some larger areas of ROW may be required to facilitate construction
- ROW uses
 - Surveys
 - Construction
 - Operation
 - Maintenance



Construction Planning Information

- **Clearing, Fencing Contractor (10 to 20 people)**
 - First pass thru ROW
 - Spring 2012
- **Foundation Contractor (75 to 100 people)**
 - Access crews and drilling crews
 - Road maintenance and SWPPP installation
 - Spring 2012
- **Line Construction Contractor (100 to 125 people)**
 - Steel pole setting crews and line pulling crews
 - Road maintenance and SWPPP inspection/repair
 - ROW restoration and temporary access removal
 - Summer 2012



Construction Progression

How A Typical Line Gets Built

Once the design work is complete and structure locations determined, structures are staked and reviewed with landowners to make sure that they are in satisfactory locations.

'Construction' starts with clearing crews removing trees in right-of-way, re-building or placing gates in fences, pushing topsoil to side to prevent damage or contamination, and establishing access for equipment along right-of-way.



Construction starts with auguring the holes where the foundations will be set.

All 'spoils' from hole drilling are removed by construction contractor – not left on site.

Heavy equipment is driven within the easement or right-of-way. Once construction is done in that section, ground is restored

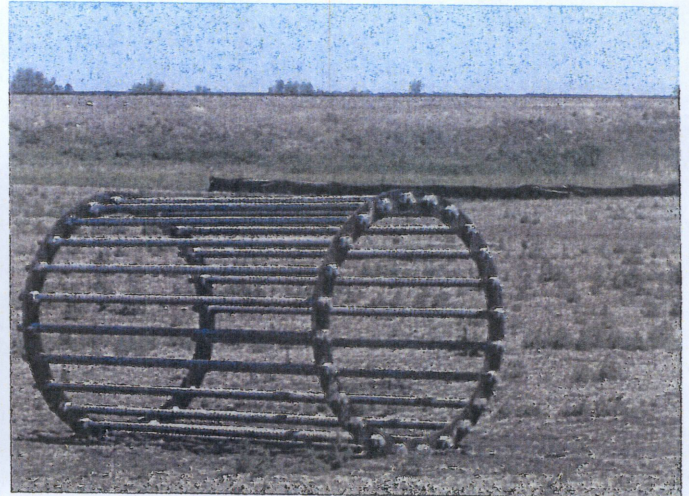
Drilled holes for foundations will typically be slightly wider than structures at base, and go 40-80 feet deep depending on soil conditions



Once hole is completed, rebar cage and anchor bolt cage are set. Rebar cage provides strength & support for concrete foundation. Anchor bolt cage is the attachment point for the steel structure.



Rebar Cage



Anchor Bolt Cage



Concrete is then poured and allowed to set for up to 28 days (depending on weather conditions) to achieve adequate strength of concrete

While the concrete is setting, steel structures are laid out near foundation and 'framed' or put together

Once the structure is assembled & concrete cured, then structures can be set in place

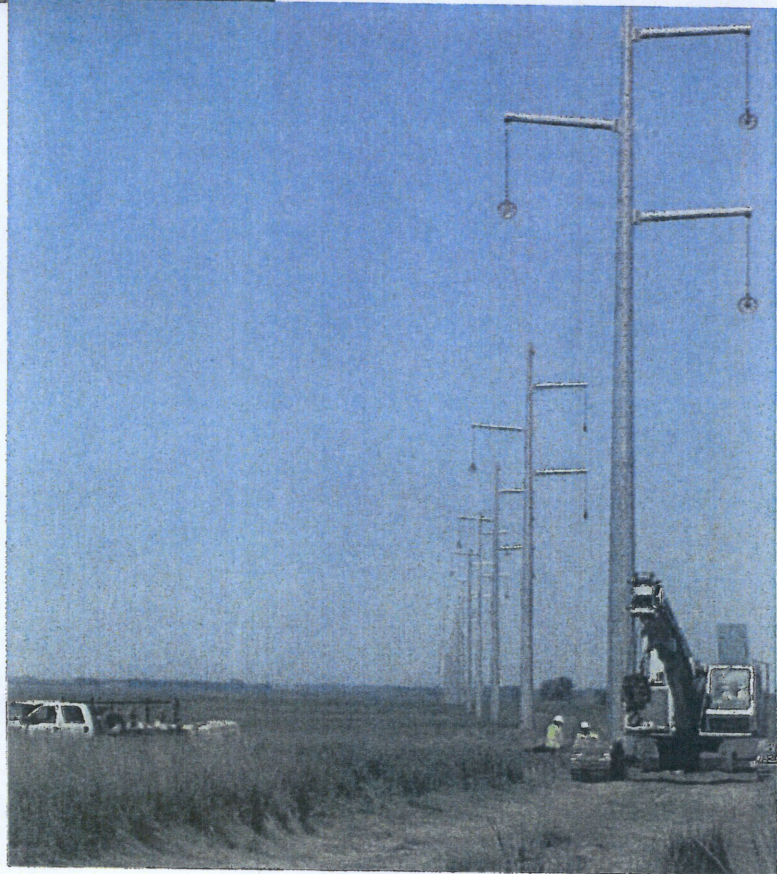




Structures are lifted into place and 'set' on the foundations

Once an entire segment of structures are in place, crews then go through and 'string' wire between poles

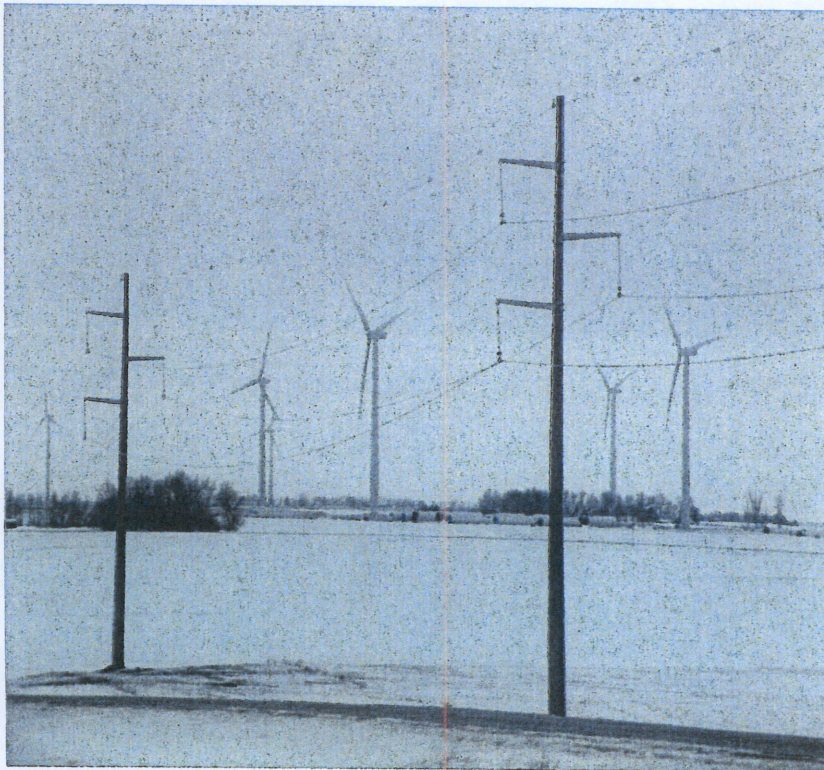
Once the wires are in place, they are set with proper tensions and clamped into place



Following the completed transmission line, crews then move along the right-of-way and restore conditions back to pre-existing by removing any excavated soils, returning good top soil, and providing for a 'deep plowing' to remove any compaction.

During restoration, ROW Agents go back out and observe what ground has been disturbed, hold discussions with land owners regarding finished result, and make calculations as to crop damage payments.

The end result is a transmission line with minimal 'footprint' on the surrounding areas, but is fully capable to transfer the power needed for our households & businesses



Other Points:

- Construction access and use of roads will be determined by 'traffic plan' which will be planned and pre-approved prior to use with local officials
- Road maintenance and repair will be responsibility of project, and verified on at least a weekly basis
- Construction contractor will utilize Landowner Liaison to communicate directly with land owners and local officials in addition to Owner's representatives

Oliver County Building Permit Fee - June 14, 2012

Oliver County	No. of Structures	Cost per Structure	Fee
Tangent Poles	53	\$77,400.00	\$4,102.20
Deadend Poles	16	\$379,200.00	\$6,067.20
Totals	69		\$10,169.40

Building Permit Fee is 0.01% of construction

STATE OF NORTH DAKOTA
PUBLIC SERVICE COMMISSION

INFORMAL COMPLAINT

Oliver County,
Complainant-Petitioner,
v
Minnkota Power Cooperative, Inc.,
Respondent.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the following documents:

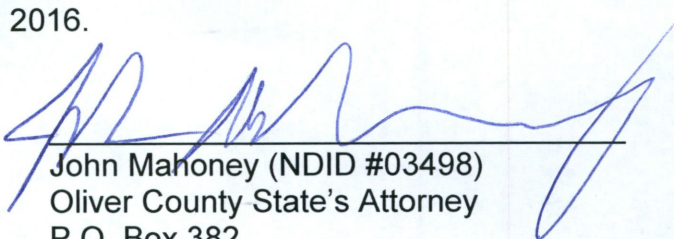
- 1) Informal Complaint;
- 2) Affidavit of John Wicklund (with attachments); and
- 3) Certificate of Service;

were served upon the following person, by placing a true and correct copy thereof in an envelope addressed as follows:

Joel L. Larson, Esq.
Minnkota Power Cooperative, Inc.
1822 Mill Road
Grand Forks, ND 58203

and depositing the same, with postage prepaid, in the United States mail at Center, North Dakota.

Dated this 1st day of June, 2016.



John Mahoney (NDID #03498)
Oliver County State's Attorney
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