

# As-Built Inspection Report

Northern Divide Wind Energy Center 345 kV Transmission Line

Northern Divide Wind, LLC

ND PSC Case No. PU-19-377

## Prepared for:

North Dakota Public Service Commission  
Public Utilities Division  
State Capitol  
600 East Boulevard – Dept. 408  
Bismarck, ND 58505-0480

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As-Built Inspection Report  
Keitu Engineers & Consultants, Inc.

## Table of Contents

EXECUTIVE SUMMARY .....	1
INTRODUCTION .....	2
PURPOSE AND SCOPE OF INSPECTION .....	2
ORDERS .....	3
CERTIFICATION .....	4
CONCLUSIONS .....	14
MANAGEMENT REVIEW .....	15

## Executive Summary

The State of North Dakota, acting through its North Dakota Public Service Commission (Commission), Division of Public Utilities, has contracted Keitu Engineers & Consultants, Inc. (Keitu) to perform consulting services for an As-Built Siting Inspection. This report addresses the Orders established by the Commission and issues established in Case No. PU-19-377.

The Northern Divide Wind Energy 345kV Transmission Line Project (Project) is approximately 41 miles in length, with approximately 23 miles located in Burke County and approximately 18 miles located in Mountrail County. The Project begins with a connection to the associated Northern Divide Wind Energy Center collection substation in Burke County, North Dakota and terminates at the interconnection point at the Tande Substation in Mountrail County, North Dakota. The Project Route consisting of a 150-foot wide corridor totals 100.5 acres. The purpose of the As-Built Inspection was to ensure the Project was constructed in compliance with the siting laws, rules, and the applicable Commission Order for the Project. Prior to the inspection, Keitu reviewed all Project documents to verify any and all aspects requiring site verification.

The site was visually inspected on September 28, 2021 by Keitu staff. The Project was well-maintained, secured, and in good condition. During the As-Built Inspection, the areas appeared to have been properly restored. Vegetation had not be reestablished in all areas due to construction being completed in the fall and will be seeded next spring. Overall, the Project appeared to be constructed as planned with numerous efforts to minimize impacts and to stay in compliance with the siting laws, siting rules, and Commission Orders.

## Introduction

The Project was approved in June, 2020 and construction began in July, 2020. Construction for the Project was completed in the spring of 2021 and is operated by NextEra Energy Resources, LLC. The Project is a 345-kilovolt (“kV”) transmission line and associated facilities. Northern Divide Wind also constructed a Wind Project, which has a nameplate capacity of up to 200 megawatts (“MW”). The Project will convey power from the planned Wind Project substation to the point of interconnection to the grid at the existing Basin Electric Power Cooperative Tande 345kV Substation (“Tande Substation”). Northern Divide Wind submitted a separate application to the Commission for a Certificate of Site Compatibility for the proposed Wind Project.

The transmission line was constructed using steel monopole structures with an average height of 120 feet and average spans of 775 feet. Guyed structures were required at approximately 43 locations, with up to 8 guy wires per structure. The Project includes a shield wire strung at the top of the structures to provide lightning protection. Bird flight diverters were mounted to the shield wire per Avian Power Line Interaction Committee guidelines.

The Project is under the jurisdiction of the North Dakota Public Service Commission, which issued its Certificate Corridor Compatibility No. 217 for Case No. PU-19-377 on June 10, 2020.

## Purpose and Scope of Inspection

The North Dakota Energy Conversion and Transmission Facility Act (North Dakota Century Code Chapter 49-22) authorizes the Public Service Commission to determine that the location, construction, and operation of jurisdictional energy conversion and transmission facilities will produce minimal adverse effects on the environment and welfare of the citizens of North Dakota. Construction Inspections ensure the Project is constructed in compliance with siting laws, rules, and the applicable Commission Order Amending Certificate and Permit (Order).

The Commission retained Keitu Engineers & Consultants, Inc. (Keitu) to complete an As-Built Construction Inspection of the Project. The inspection process included a review of the Consolidated Application for Certificate of Corridor Compatibility and Route Permit (Application), Order, Certification Relating to Order Provisions (Certification), and other applicable documents to determine Project-specific siting and construction requirements; a site visit and inspection of facilities; documentation of compliance; and a report summarizing findings. This report includes, but is not limited to, site visit observations, documentation of compliance deficiencies, and a summary of issues that should be addressed for the Project to be considered complete and in full compliance.

## Methods

Keitu reviewed North Dakota siting laws and rules, the Application, Certification, and the Order for the Project to identify what Project-specific documentation was required for compliance.

Keitu then reviewed Project documents in the PSC Online Case Search to identify those siting laws, rules, and Application and Order assertions that already had written verification, those that still required documentation, and those that required physical site verification.

Keitu Staff visited the Project area on September 28, 2021 to visually inspect the site. Digital photographs were taken showing typical Project infrastructure. The Project was in operation at the time of visit.

## Orders

The following section includes discussion of a list of components of the Project that were asserted in the Order which could be documented during the As-Built Inspection to verify compliance with siting laws, rules and the Order for the Project, via either written documentation or physical site verification. Included are detailed findings and observations from Keitu personnel involved in the As-Built Inspection for the Project.

On February 19, 2020, the Commission deemed the applications for both the Wind Project and associated Transmission Project (PU-19-377) complete and issued a Notice of Filings and Consolidated Hearing. A public hearing was scheduled for April 17, 2020 at 9:30 a.m. CDT, at Memorial Hall, 100 Main Street NW, Bowbells, North Dakota 58721.

Due to the public health crisis result from the novel coronavirus, the North Dakota Governor declared a state of emergency and public gatherings were restricted. As a result, on April 9, 2020, the Commission issued Amended Notice of Filings and Consolidated Hearing amending the location of the April 17, 2020 9:30 a.m. CDT public hearing to be held via remote means ("Amended Notice"). The Amended Notice provided as follows:

A consolidated Public Hearing on the applications in Case No. PU-19-376 and Case No. PU-19-377 was noticed to be located at Memorial hall, 100 Main Street NW Bowbells, ND 58721. Due to the state of emergency, the Public Hearing will be held remotely to begin April 17, 2020 at 9:30 a.m. CDT. The public is encouraged to view the hearing electronically via <http://psc.nd.gov/public/meetings/live.php> or listen telephonically via 1-888-585-9008 with room code 259-316-322.

- 1. Certificate of Corridor Compatibility No. 217 is issued to Northern Divide Wind designating a corridor area 150 to 200 feet wide centered on the Transmission Line Project route for the construction, operation, and maintenance of the Northern Divide Wind 345 kV transmission line and associated facilities in Burke and Mountrail Counties, North Dakota. The approved corridor is identified as the "Northern Divide 345-kV Transmission Line Right-of-Way" on Map 1 of 18 to 18 of 18 in Appendix D of Exhibit #2.**

On June 10, 2020, the Commission issued Certificate of Corridor Compatibility No. 217 to Northern Divide Wind for the Project. Order #1 is complete.

2. **Route Permit No. 227 is issued to Northern Divide Wind designating a route in Burke and Mountrail Counties, North Dakota, for the construction and operation of an approximately 41-mile 345-kV transmission line. The designated route for this purpose is identified as the “Northern Divide 345-kV Transmission Line Project Route” on Map 1 of 18 to 18 of 18 in Appendix D of Exhibit #2.**

Route Permit No. 227 was issued to Northern Divide Wind on June 10, 2020. Order #2 was followed.

3. **The Transmission Project Certification Relating to Order Provisions with accompanying Tree and Shrub Mitigation Specifications admitted as Exhibit #5 is incorporated by reference and attached to this Order.**

Order #3 was followed.

4. **To the extent there are any conflicts or inconsistencies between Northern Divide Wind’s Transmission Line Project application and the Certification, the Certification provisions control.**

Order #4 was followed.

5. **If modifications are made to the Transmission Line Project, Northern Divide Wind shall complete a Class III Cultural Resource Survey for any previously un-surveyed portions of the designated site affected by construction activities, in accordance with SHPO guidance, and shall submit cultural resource finds to SHPO for review, and file a copy of SHPO’s response with the Commission prior to beginning construction in said areas. Additionally, Northern Divide Wind shall consult with NDGFD. A Copy of correspondence with NDGFD and the NDGFD’s response, if any, must be filed with the Commission.**

Order #5 was followed.

## Certification

The following section includes discussion of relevant items included in the Certification attached by reference to original Order. All certification points relevant to the As-Built Inspection Report are included.

1. **Company understands and agrees that the Certificate of Corridor Compatibility or Route Permit issued by the Commission will be subject to the conditions and criteria set forth in Chapter 49-22 of the North Dakota Century Code and Chapter 69-06-08 of the North Dakota Administrative Code, and that Company shall be responsible for**

**compliance with this order and conditions and criteria set forth in the applicable laws and rules.**

Certification Point #1 was followed.

- 2. Company agrees to comply with the rules and regulations of all other agencies having jurisdiction over any phase of the proposed energy conversion facility including all city, township, and county zoning regulations.**

Based on available information, it is Keitu’s opinion that Certification Point #2 was followed.

- 3. Company understands and agrees that it shall obtain all other necessary licenses and permits, and shall provide copies of all licenses and permits to the Commission prior to construction activity associated with the transmission facility that requires said license or permit.**

Based on available information, it is Keitu’s opinion that Certification Point #3 was followed.

- 4. Company understands and agrees that any Certificate of Corridor Compatibility or Route Permit issued by the Commission is subject to suspension or revocation and may, in an appropriate and proper case, be suspended or revoked for failure to comply with the Commission’s order, the conditions and criteria of the certificate or subsequent modification, or failure to comply with the applicable statutes, rules, regulations, standards, and permits of other state or federal agencies.**

Certification Point #4 was followed.

- 5. Company agrees to maintain records that will demonstrate that it has complied with the requirements of the Commission’s order issuing a Certificate of Corridor Compatibility or Route Permit, and that it will preserve these records for Commission inspection at any reasonable time upon reasonable notice.**

Based on available information, it is Keitu’s opinion is that Certification Point #5 was followed.

- 6. Company understands and agrees that the authorizations granted by any Certificate of Corridor Compatibility or Route Permit issued by the Commission for the transmission facility are subject to modification by order of the Commission if deemed necessary to protect further the public or the environment.**

Certification Point #6 as followed.

- 7. Company agrees to hold a preconstruction conference prior to commencement of any construction, which must include a Company representative, its construction supervisor, and a representative of Commission Staff, to ensure that Company fully understands the conditions set forth in the Commission's order.**

A preconstruction conference call was held on June 15, 2020. Company representatives, the construction supervisor, Commission Staff, and the Commission's third-party construction inspectors were in attendance. Certification Point #7 was followed.

- 8. Company understands and agrees that all cultural resource mitigation plans must be submitted to the North Dakota State Historic Preservation Office and approved prior to the start of any fieldwork and construction activity in the affected area.**

On February 24, 2020, ND SHPO notified the Company that they had reviewed the reports for the Project (ND SHPO Ref.: 19-0490) entitled *Northern Divide Wind Energy Center: A Class III Cultural Resource Inventory in Burke County, North Dakota* and concurred with the determination of "No Historic Properties Affected" for the Project provided it takes place in the location and in the manner described in the documentation. Certification Point #8 was followed.

- 9. Company understands and agrees that topsoil removal will begin when the Commission's third-party construction inspector is present at the Project site to observe that topsoil is properly removed and kept segregated from subsoil until replacement occurs. Company shall establish the date and time for the Commission's third-party construction inspector's topsoil removal oversight in the preconstruction conference.**

Keitu was present on-site for topsoil removal on July 27, 2020 and determined that the topsoil was properly removed and segregated from subsoil. Certification Point #9 was followed.

- 10. Company agrees to inform the Commission and the Commission's third-party construction inspector of its intent to start construction on the transmission facility prior to the commencement of construction. Once construction has started, Company shall keep the Commission and the Commission's third-party construction inspector updated on construction activities on a monthly basis.**

Northern Divide Wind, LLC notified the Commission and Keitu, the Commission's third-party construction inspector of their intent to start construction on the transmission facility during the preconstruction conference held on June 15, 2020. Construction inspection reports were not filed monthly July 2020 through October 2020. On January 13, 2021, construction reports for July 2020 through November 2020 were filed with the commission, reports were filed monthly thereafter.

11. **Company understands and agrees that all topsoil, up to 12 inches, or topsoil to the depth of cultivation, whichever is greater, over and along trench areas where cuts will be made, must be carefully stripped and segregated from the subsoil. Any area on which excavated subsoil will be placed must also be stripped of topsoil. The stripped topsoil must not be stockpiled in natural drainages, and must be protected from water erosion. Care must be taken to protect topsoil from unnecessary compaction by heavy machinery. Unless otherwise approved by the Commission, topsoil must be removed before topsoil freezes in the late fall/early winter to the point that frost inhibits proper soil segregation. After backfilling with subsoil is completed, any excess subsoil must be placed over the excavation area, blending the grade into existing topography. Topsoil must be replaced over areas from which it was stripped only after the subsoil is replaced.**

Keitu conducted a topsoil inspection when construction activities commenced for the project and observed topsoil removal during the construction inspection on July 27, 2020 and found topsoil removal activities to be in compliance with the Commission’s Order. Certification Point #11 was followed.

12. **Company understands and agrees that all buried facility crossings of graded roads must be bored unless the responsible governing agency specifically permits the Company to open cut the road.**

Based on available information, Keitu’s opinion is that Certification Point #12 was followed.

13. **Company understands and agrees that staging areas or equipment shall not be located on land owned by a person other than Company unless otherwise negotiated with landowners.**

Based on available information, it is Keitu’s opinion that Certification Point #13 was followed.

14. **Company understands and agrees that if any cultural resource, paleontological site, archeological site, historical site, or grave site is discovered during construction, it must be marked, preserved and protected from further disturbances until a professional examination can be made and a report of such examination is filed with the Commission and the State Historical Society.**

Based on available information, Keitu’s opinion is that Certification Point #14 was followed.

15. **Company understands and agrees that construction must be suspended when weather conditions are such that construction activities will cause irreparable damage to roads or land, unless adequate protection measures are taken by Company.**

Based on available information, it is Keitu’s opinion Certification Point #15 was followed.

- 16. Company understands and agrees that the Commission has authority to stop Project construction activities in the event of a probable violation of the siting laws, siting rules, or applicable Commission Orders if, in the opinion of the Commission, construction activities are likely to result in irreparable or significant harm.**

Certification Point 16 was followed.

- 17. Company understands and agrees that it shall, as soon as practicable upon the completion of the construction of the transmission facility, restore the area affected by the activities to as near as is practicable to the condition as it existed prior to the beginning of construction.**

It is Keitu’s opinion is that Certification Point #17 has been followed.

- 18. Company understands and agrees that all pre-existing township and county roads and lanes used during construction must be repaired or restored to a condition that is equal to or better than the condition prior to the construction of the transmission facility and that will accommodate their previous use, and that areas used as temporary roads or working areas during construction must be restored to their original condition.**

Based on available information, it is Keitu’s opinion that Certification Point #18 has been followed.

- 19. Company understands and agrees that reclamation, fertilization, and reseeding is to be done according to the Natural Resources Conservation Service recommendations, unless otherwise specified by the landowner and approved by the Commission.**

Based on available information, it is Keitu’s opinion that Certification Point #19 has been followed.

- 20. Company will fulfill its obligation for reclamation and maintenance of the approved transmission facility right-of-way, transmission facility, and associated facilities continuing throughout the life of the transmission facility.**

Based on available information, Keitu’s opinion is that Certification Point #20 has been followed.

- 21. Company will repair all fences and gates removed or damaged during all phases of construction and operation of the transmission facility.**

Based on available information, Keitu’s opinion is that Certification Point #21 has been followed.

- 22. Company will repair or replace all drainage tile broken or damaged as a result of construction and operation of the transmission facility.**

Based on available information, Keitu’s opinion is that Certification Point #22 was followed.

- 23. Company agrees to comply with the Tree and Shrub Mitigation Specifications, attached.**

Based on available information, Keitu’s opinion is that Certification Point #23 was followed.

- 24. Company understands and agrees that it shall work with landowners and residents to mitigate any increase in television and residential radio interference that results from the construction of the transmission facility.**

Based on available information, Keitu’s opinion is that Certification Point #24 was followed.

- 25. Company understands and agrees that it shall remove all waste that is a product of construction and operation, restoration, and maintenance of the site, and properly dispose of it on a regular basis.**

Based on available information, Keitu’s opinion is that Certification Point #25 was followed.

- 26. Company understands and agrees that it shall provide any necessary safety measures for traffic control or to restrict public access to the transmission facility.**

Based on available information, Keitu’s opinion is that Certification Point #26 was followed.

- 27. Company understands and agrees that, prior to beginning construction of the transmission facility at a location, it shall send a letter to each landowner with whom an easement was executed for that location specifying the name and phone number of the company representative who is responsible for receiving and resolving landowner issues for the life of the easement.**

Based on available information, Keitu’s opinion is that Certification Point #27 was followed.

- 28. Company understands and agrees that it will file with the commission the name and phone number of the current company representative who is responsible for receiving and resolving landowner issues for the transmission facility. The company will update this information whenever there is a change to the current company representative for the life of all easements for the transmission facility.**

Based on available information, it is Keitu’s opinion that Certification Point #28 has been followed.

**29. Upon request, Company agrees to provide the Commission with engineering design drawings of the transmission facility prior to construction.**

Based on available information, Keitu’s opinion is that Certification Point #29 was followed.

**30. Company understands and agrees that it shall advise the Commission as soon as reasonably possible of any extraordinary events which take place at the site of the transmission facility, including injuries to any person.**

Based on available information, Keitu’s opinion is that Certification Point #30 was followed.

**31. Company agrees to report to the Commission, as soon as reasonably possible, the presence in the permit area of any critical habitat or threatened or endangered species of which Company becomes aware and which were not previously reported to the Commission.**

Based on available information, Keitu’s opinion is that Certification Point #31 was followed.

**32. Company understands and agrees that it shall inform the Commission in writing of any plans to modify the transmission facility or of any plans to modify the site plan for the transmission facility.**

Based on available information, Keitu’s opinion is that Certification Point #32 was followed.

**33. Company agrees to provide the Commission with both an electronic and a paper copy of the corridor approved by the Commission and the facility design specifications for the construction of the transmission facility showing the location of the transmission facility as built, and will provide this information within 3 months of the completion of the construction. Company also agrees to provide an electronic version of the corridor approved by the Commission and the facility design specifications for the construction of the transmission facility showing the location of the transmission facility as built that can be imported into ESRI GIS mapping software within 3 months of the completion of the construction. This electronic map data must be referenced to the North Dakota coordinate system of 1983, North and/or South zones US Survey feet (NAD 83) UTM Zone 13N or 14N feet (NAD 83), or geographic coordinate system (WGS 84) feet. The vertical data must be in the appropriate vertical datum for the coordinate system used. All submissions must specify the datum in which the data was developed.**

Certification Point #33 was followed.

- 34. Company shall notify the Commission as soon as reasonably possible if any damage, as defined by North Dakota Century Code Chapter 49-23, occurs to underground facilities during construction conducted under the certificate or permit issued in this proceeding. In the event of any damage to underground facilities, Company shall suspend construction in the vicinity of the damage until compliance with One-Call Excavation Notice System requirements under North Dakota Century Code Chapter 49-23 has been determined.**

Based on available information, Keitu’s opinion is that Certification Point #34 was followed.

- 35. Company agrees to utilize the following procedures if Company seeks a route adjustment before or during construction of the transmission line.**

Certification Point #35 was followed.

- 36. Company will file the name and contact information for a key contact person for the purposes of notice and communication during the adjustment application.**

Certification Point #36 was followed.

- 37. ROUTE ADJUSTMENT WITHIN DESIGNATED CORRIDOR, NO AVOIDANCE AREA AFFECTED: Before conducting any construction activities for any adjustment to the designated route within the designated corridor, the Company will file:**
- a. Certification and supporting documentation affirming that construction activities will be within the designated corridor, will not affect any known exclusion or avoidance areas within the designated corridor;**
  - b. Certification and supporting documentation, including a map meeting the requirements of N.D. Admin. Code § 69-06-04-01(2)(n) identifying the designated corridor, route and the route adjustment;**
  - c. Certification that Company will comply with the Commission’s order, law and rules designating the corridor and route.**

Based on available information, it is Keitu’s opinion that Certification Point #37 has been followed.

- 38. ROUTE ADJUSTMENT WITHIN DESIGNATED CORRIDOR, AVOIDANCE AREA AFFECTED: Before adjusting the route of an electric transmission line within the designated corridor that may affect an avoidance area, and before conducting any construction**

**activities for any adjustment to the designated route within the designated corridor, the Company will file:**

- a. **A specific description of the avoidance area expected to be impacted, including a map meeting the requirements N.D. Admin. Code § 69-06-04-01(2)(n) identifying:**
  - i. **The designated corridor, route and the route adjustment;**
  - ii. **All exclusion and avoidance areas within the portion of the designated corridor containing the route adjustment.**
- b. **Certification and supporting documentation affirming:**
  - i. **That construction activities will be within the designated corridor**
  - ii. **That construction activities will not affect any known exclusion area**
- c. **All field studies performed on the portion of the designated corridor containing the route adjustment;**
- d. **Specific information about any mitigation measures Company will take within the adjustment area;**
- e. **Certification that each owner of real property on which the adjustment is to be located and any applicable governmental entity with an interest in the same adjustment area do not oppose the adjustment;**
- f. **Certification that unless the Commission previously authorized the impact to the same avoidance area, that the utility has good cause and a specific reason to impact the avoidance area and a reasonable alternative does not exist;**
- g. **Certification that Company will comply with the Commission’s order, law and rules designated the corridor and route.**

Based on available information, Keitu’s opinion is that Certification Point #38 has been followed.

**39. ROUTE ADJUSTMENT OUTSIDE DESIGNATED CORRIDOR, NO AVOIDANCE AREA AFFECTED:** Before adjusting the route of an electric transmission line outside the designated corridor and not affecting any exclusion and avoidance area, before conducting any construction activities for any adjustment to the designated route outside the designated corridor, the Company will file:

- a. **Certification and supporting documentation affirming that construction activities will not affect any known exclusion or avoidance areas,**
- b. **Certification and supporting documents stating the length of the proposed route outside of the corridor and a map meeting the requirements of N.D. Admin. Code § 69-06-04-01(2)(n) identifying the designated corridor, corridor adjustment, designated route and the route adjustment;**

- c. **Certification that each owner of real property on which the adjustment is to be located and any applicable governmental entity with an interest in the same adjustment area do not oppose the adjustment; and**
- d. **Detailed field studies indicating exclusion and avoidance areas for the proposed adjustment area; and**
- e. **Certification that Company will comply with the Commission's order, law and rules designating the corridor and route.**

On July 24, 2020, Northern Divide Wind LLC submitted written notice of one minor proposed modification to the Project route located in Burke County that occurred outside of adjacent to the Commission designated corridor. To accommodate a landowner request, Northern Divide Wind proposed minor shifts to the Project route and five accompanying pole structures 072 to 076. The route modification occurred within areas previously surveyed for wildlife and avian species. Additional surveys for wetlands and cultural and tribal resources were completed in June, 2020 for areas extending outside the previously surveyed areas. No additional cultural or tribal resources were identified within the area of the proposed corridor modification.

As a result of the modification, the Project route avoids directly spanning a majority of the wetland located between structures 075 and 076. The wetland feature identified between modified pole structure 073 and 074 will be avoided during construction. No known Exclusion or Avoidances are located within the adjustment area.

On August 17, 2020, the Commission notified Northern Divide Wind, LLC that the modification between 072 and 076 and certified that:

- 1) The construction activities will not affect any known exclusion or avoidance area as defined under the North Dakota Administrative Code chapter 69-06-08.
- 2) The route modification was requested by the landowner and extends approximately 2,620 feet outside of and adjacent to the designated corridor.
- 3) The Project will comply with all applicable conditions and protections in applicable North Dakota siting laws and rules and Commission orders previously issued for any part of the facilities.

Based on available information, Keitu's opinion is that Certification Point #39 has been followed.

**40. ROUTE ADJUSTMENT OUTSIDE DESIGNATED CORRIDOR, AVOIDANCE AREA AFFECTED: Before adjusting the route of an electric transmission line outside the designated corridor that may affect an avoidance area, and before conducting any construction activities for any adjustment to the designated route outside the designated corridor, the Company will file:**

- a. **A specific description of the avoidance area expected to be impacted, including a map meeting the requirements of N.D. Admin. Code § 69-06-04-01(2)(n) identifying:**

- i. The designated corridor, corridor adjustment, route and the route adjustment;
- ii. All exclusion and avoidance areas within the adjustment area
- b. Certification that construction activities will not affect any known exclusion area;
- c. Certification that the utility has good cause and a specific reason to impact the avoidance area and a reasonable alternative does not exist within the designated corridor and route;
- d. Certification that each owner of real property on which the adjustment is to be located and any applicable governmental entity with an interest in the same adjustment area do not oppose the adjustment;
- e. Provide specific information about any mitigation measures Company will take within the adjustment area;
- f. Detailed field studies indicating exclusion and avoidance areas for the proposed adjustment area; and
- g. Certification that Company will comply with the Commission’s order, law and rules designating the corridor and route.

Company acknowledges and agrees that:

- 41. When applicable, Company may submit the field studies from the original application for the corridor and route provided they cover the adjustment area.**

Certification Point #41 was followed.

- 42. Company acknowledges and agrees that written authorization from the Commission for impacting the avoidance area is necessary prior to commencement of construction activity.**

Certification Point #42 was followed.

## Conclusions

Overall, the Project appeared to be constructed as designed with minimal impacts to the surrounding environment. The Project site was in good condition, well maintained, and appeared to be constructed in compliance with the siting laws, siting rules, and applicable Commission Orders.

Northern Divide Wind, LLC notified the Commission and Keitu, the Commission’s third-party construction inspector of their intent to start construction on the transmission facility during the preconstruction conference held on June 15, 2020. Construction inspection reports were not filed

monthly July 2020 through October 2020. On January 13, 2021, construction reports for July 2020 through November 2020 were filed with the commission, reports were filed monthly thereafter.

## Management Review

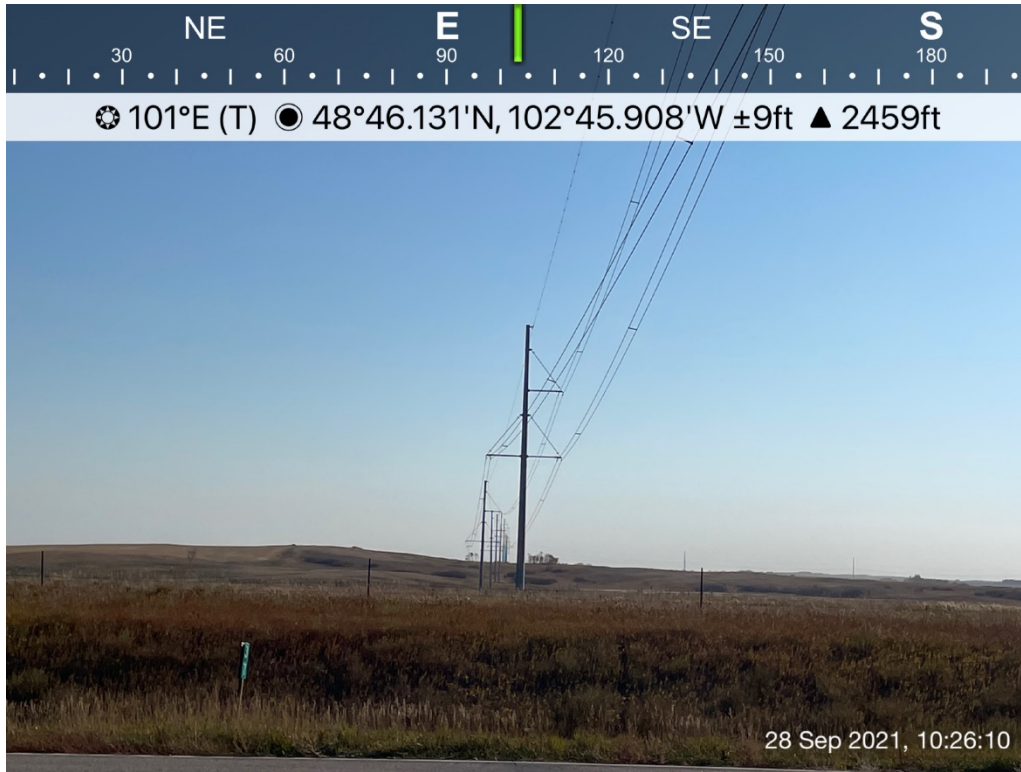
The services performed by Keitu and its staff for this project have been conducted in a manner consistent with the degree of care and technical skill appropriately exercised by professionals currently practicing in this area under similar time and budget constraints.

Recommendations and findings contained in this report represent our professional judgment and are based upon available information and technically accepted practices at the present time and location. Other than this, no warranty is implied or expressed.

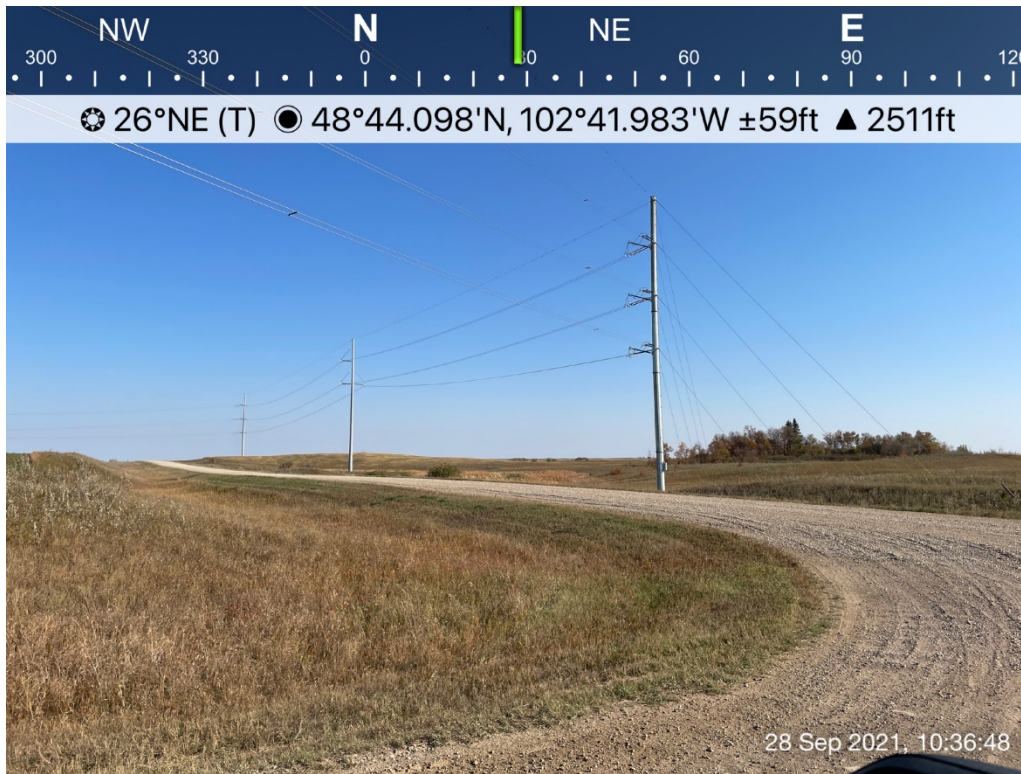
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Jaimee Antognazzi, Operations Manager

**Report Photo #1: North End Monopole Structures**



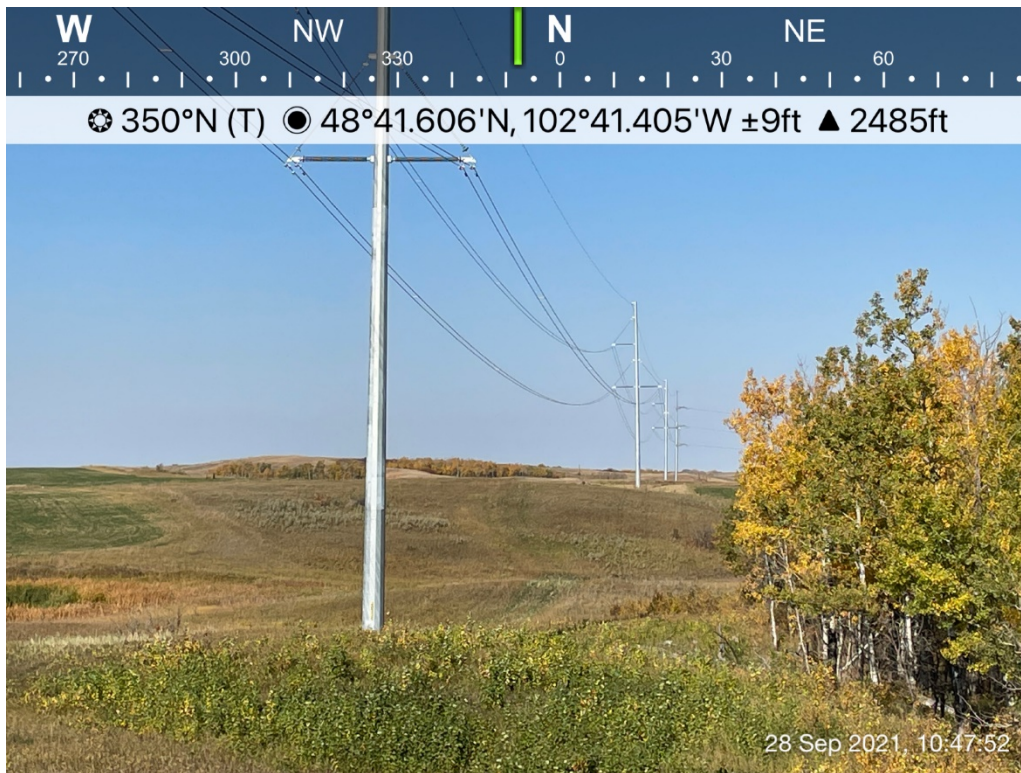
**Report Photo #2: Guyed Structure**



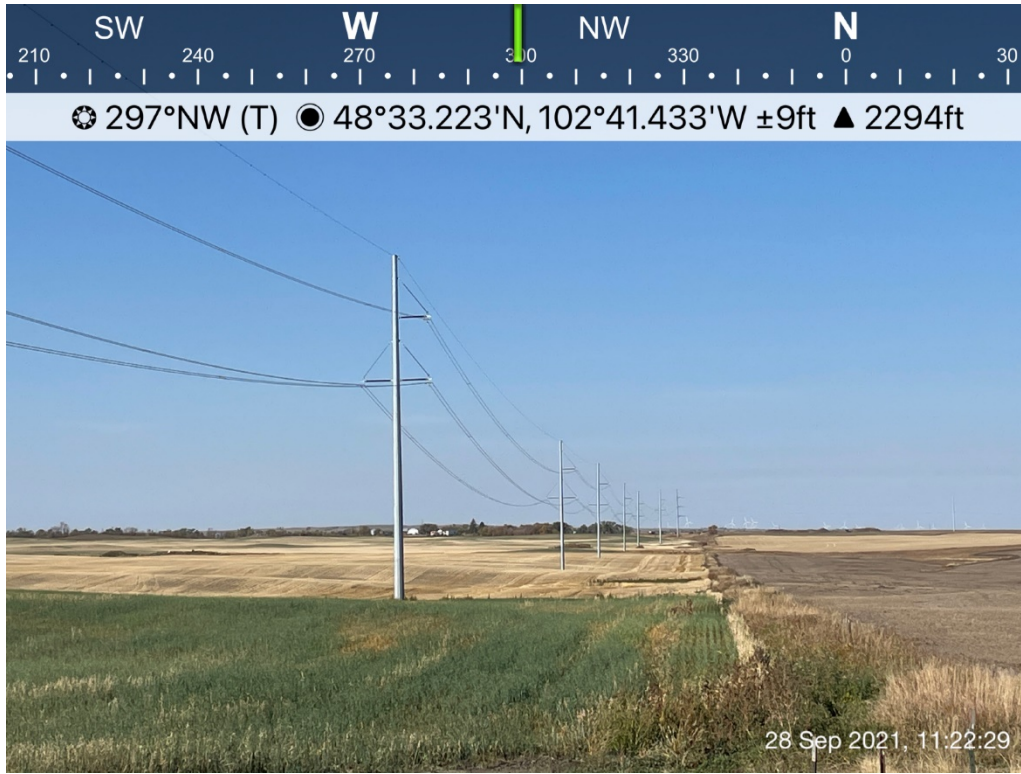
**Report Photo #3: Guyed Structure near Wetland**



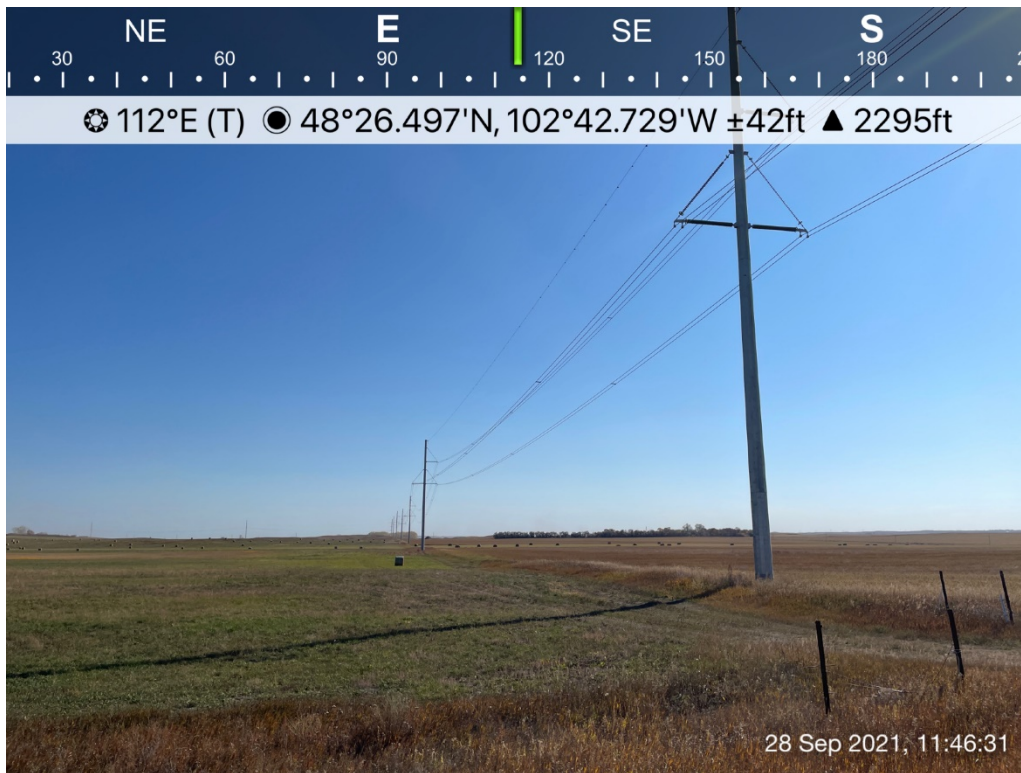
**Report Photo #4: Monopole Structures in Pastureland**



**Report Photo #5: Monopole Structures in Cropland**



**Report Photo #6: Monopole Structures along Section Line**



**Report Photo #7: Monopole Structures in Valley**

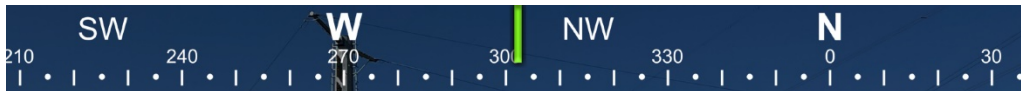


☉ 283°W (T) ☉ 48°25.626'N, 102°44.575'W ±39ft ▲ 2285ft



28 Sep 2021, 11:55:43

**Report Photo #8: Connection at Tande Substation**



☉ 301°NW (T) ☉ 48°23.877'N, 102°50.737'W ±13ft ▲ 2209ft



28 Sep 2021, 12:38:57

**Project Map:**

