

Rebuttal Testimony

Grant Stevenson

STATE OF MINNESOTA

**OFFICE OF ADMINISTRATIVE HEARINGS
FOR THE PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE ROUTE PERMIT
APPLICATION FOR THE CAPX2020
HAMPTON – ROCHESTER – LA CROSSE
345 KV TRANSMISSION LINE

PUC DOCKET No. E002/TL-09-1448
OAH DOCKET No. 7-2500-20283-2

REBUTTAL TESTIMONY OF

GRANT STEVENSON

On Behalf of

APPLICANT

NORTHERN STATES POWER COMPANY, A MINNESOTA CORPORATION

May 27, 2011

Exhibit _____

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1 I. INTRODUCTION

2

3 Q. PLEASE STATE YOUR NAME.

4 A. My name is Grant Stevenson.

5

6 Q. HAVE YOU PREVIOUSLY PROVIDED TESTIMONY IN THIS PROCEEDING?

7 A. Yes. I provided direct testimony on behalf of Xcel Energy.

8

9 Q. HAVE YOU REVIEWED THE DIRECT TESTIMONY OF OTHER PARTIES IN THIS
10 PROCEEDING FILED ON OR ABOUT MAY 20, 2011?

11 A. Yes I have.

12

13 Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

14 A. I am providing rebuttal testimony to respond to the direct testimony provided
15 by Oronoco Township witness Jeffrey Broberg, specifically his statements
16 regarding Federal Aviation Administration (“FAA”) rules. In addition, I offer
17 testimony regarding the cost of undergrounding at an alternative Mississippi
18 River location in response to comments made by the Minnesota Department of
19 Natural Resources (“Mn/DNR”) on the Draft Environmental Statement
20 (“DEIS”).

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II. ORONOCO TOWNSHIP

Q. MR. BROBERG RAISES CONCERNS REGARDING FAA REQUIREMENTS IN THE ZUMBRO RIVER AREA. ARE YOU FAMILIAR WITH FAA GUIDELINES RELATIVE TO THE CONSTRUCTION OF TRANSMISSION LINES?

A. Yes. Transmission line facilities, such as those proposed here, must comply with FAA requirements, including lighting requirements and height restrictions near airports. As project manager on multiple transmission projects, I have assisted in evaluating these requirements and ensuring compliance.

Q. HAVE YOU ASSESSED THE FAA REQUIREMENTS FOR LIGHTING STRUCTURES WITH RESPECT TO THE HAMPTON – ROCHESTER – LA CROSSE 345 kV PROJECT?

A. Yes.

Q. WHAT IS YOUR RESPONSE TO MR. BROBERG’S ASSERTION THAT POLES WOULD BE OF SUCH A HEIGHT AT THE WHITE BRIDGE CROSSING OF THE ZUMBRO RIVER (MODIFIED PREFERRED ROUTE) THAT POLE LIGHTING WOULD BE REQUIRED?

A. Mr. Broberg asserts that the transmission poles using the White Bridge crossing would be more than 200 feet “above the bridge” and “above the water” and therefore must be lighted. (Broberg, p. 24.) I believe that Mr. Broberg misapplied the FAA regulations set forth in 14 CFR part 77. The FAA regulations relate to poles 200 feet above “ground level” “at its site”. *See* 14 CFR part 77.13 (requiring notice to FAA of “any construction or alteration of more than 200 feet in height above the ground level at its site”). None of the

1 poles proposed for the Project will exceed 200 feet; therefore the requirements
2 would not apply. Even if Mr. Broberg's interpretation of the FAA regulations
3 were correct, it would not be a differentiating factor between the three Zumbro
4 River crossings. Assuming these regulations required lighting if pole tops were
5 located 200 feet above the river, the other two crossings would also be
6 impacted because they would place poles at an even greater height above the
7 river.

8 9 III. COSTS OF UNDERGROUNDING

10
11 **Q. THE MN/DNR HAS SUGGESTED THAT OTHER LOCATIONS ALONG THE**
12 **MISSISSIPPI RIVER SHOULD BE CONSIDERED FOR UNDERGROUNDING. THE**
13 **COMPANY ANALYZED THREE DIFFERENT LOCATION, ALMA, WINONA AND**
14 **LA CRESCENT AND PREPARED A COST ESTIMATE FOR AN UNDERGROUND**
15 **ALMA CROSSING. HOW WOULD THE COST OF UNDERGROUNDING COMPARE**
16 **AT THE WINONA AND LA CRESCENT LOCATIONS?**

17 A. Underground construction cost estimates for the Winona and La Crescent
18 crossings were not prepared. However, the crossing at La Crescent is at least
19 8,200 feet or 1.2 times the length of the crossing at Alma. The Winona
20 crossing is 17,000 feet or 2.5 times the length of the crossing at Alma.
21 Construction costs for the La Crescent and Winona crossings would be higher
22 than Alma by approximately these same ratios. Furthermore, the Winona
23 crossing is unlikely to be technically feasible because the entire 17,000 feet
24 would require horizontal directional drilling and therefore a 17,000 foot long
25 cable. Alma and La Crescent would be a combination of open trench and

1 horizontal directional drilling which would allow for splicing manholes and
2 shorter cable lengths.

3

4

IV. CONCLUSION

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6 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

7 A. Yes.

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