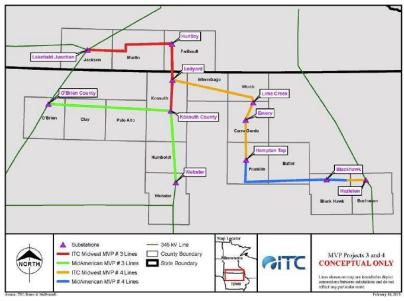
### How is "need" defined and determined?

The Minnesota Public Utilities Commission will determine whether this ITC Midwest transmission proposal is needed, and <u>IF</u> it is determined that it is needed, then the PUC will determine where the route will be located. This is a two docket process, one for "need" and one for "route." The DEIS is the environmental review for both dockets in MN.

What is "need" for this project? It is proposed by ITC Midwest, a transmission only company, which buys, builds and operates transmission for profit. It is NOT a utility, NOT a public service corporation, does NOT provide an essential public service, does NOT have service territory or retail customers. It's for ITC benefit/profit and for the benefit of those who generate, market, and buy electricity.

It's classified as a a Multi Value Project "MVP" project, to aid marketing electricity for **private profit**, one of 17 "MVP" projects **which <u>together</u>**, **as a <u>package</u>**, provide benefits. The economic benefit modeling includes <u>ALL 17 PROJECTS</u>, and not just ITC's MN/IA line. Costs of <u>ALL</u> 17 MVP projects must be considered too! This map shows MVP 3 and 4:



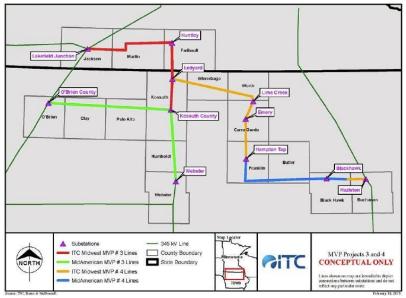
What does this project do for Minnesotans?

#### How is "need" defined and determined?

The Minnesota Public Utilities Commission will determine whether this ITC Midwest transmission proposal is needed, and <u>IF</u> it is determined that it is needed, then the PUC will determine where the route will be located. This is a two docket process, one for "need" and one for "route." The DEIS is the environmental review for both dockets in MN.

What is "need" for this project? It is proposed by ITC Midwest, a transmission only company, which buys, builds and operates transmission for profit. It is NOT a utility, NOT a public service corporation, does NOT provide an essential public service, does NOT have service territory or retail customers. It's for ITC benefit/profit and for the benefit of those who generate, market, and buy electricity.

It's classified as a a Multi Value Project "MVP" project, to aid marketing electricity for **private profit**, one of 17 "MVP" projects **which <u>together</u>**, **as a <u>package</u>**, provide benefits. The economic benefit modeling includes <u>ALL 17 PROJECTS</u>, and not just ITC's MN/IA line. Costs of <u>ALL</u> 17 MVP projects must be considered too!



What does this project do for Minnesotans?

# Be sure to send in your DEIS Comments Tell them what's missing, what they need to address!

The DEIS is misleading to the extent that it parrots ITC's claim of need. The DEIS should define "need," and disclose who is receiving benefits. What are the socioeconomic considerations, what policies are promoted, what's the balance in the cost/benefit analysis of the DEIS?

- ITC benefits through more transmission for profit.
- Generators putting electricity into the grid benefit by receiving more for electricity, because prices are higher further east.
- Generators also benefit because they can market surplus generation, and now reach those higher priced markets.
- Recipients further east benefit because pay less for electricity, electricity that would otherwise be sold here.
- Where's the benefit to Minnesota ratepayers?

System Alternatives? Request that the Commission consider all alternatives, <u>individually and in combination</u> -- efficiency and conservation, demand side management, and distributed generation including on site solar.

Phased and connected actions – connects to the Split Rock-Lkfld Jct line! Cumulative impacts? What's the impact of a 17 project MVP package?

Make them disclose the high capacity of the line! Report EMF levels for full capacity? What about corona/ultra violet emissions and cancer?

How will a private non-utility obtain any land to expand the right of way? A private purpose doesn't qualify for eminent domain!

### DEIS Comments due 4:30 p.m. on May 9, 2014 Send comments to raymond.kirsch@state.mn.us

To see the DEIS, go to eDockets, www.puc.state.mn.us, then click blue "Search eDockets," enter the year "12" and the docket number, either "1053" or "1337" and click "Search." To get notice of all filings, subscribe. At the docket page, click a box in the "Subscribe" column, click "Subscribe" and follow directions with email and docket.

Carol A. Overland, Attorney at Law, overland@legalectric.org, representing

Citizens Energy Task Force and No CapX2020

Visit www.cetf.us and www.nocapx2020.info

# Be sure to send in your DEIS Comments Tell them what's missing, what they need to address!

The DEIS is misleading to the extent that it parrots ITC's claim of need. The DEIS should define "need," and disclose who is receiving benefits. What are the socioeconomic considerations, what policies are promoted, what's the balance in the cost/benefit analysis of the DEIS?

- ITC benefits through more transmission for profit.
- Generators putting electricity into the grid benefit by receiving more for electricity, because prices are higher further east.
- Generators also benefit because they can market surplus generation, and now reach those higher priced markets.
- Recipients further east benefit because pay less for electricity, electricity that would otherwise be sold here.
- Where's the benefit to Minnesota ratepayers?

System Alternatives? Request that the Commission consider all alternatives, <u>individually and in combination</u> -- efficiency and conservation, demand side management, and distributed generation including on site solar.

Phased and connected actions – connects to the Split Rock-Lkfld Jct line! Cumulative impacts? What's the impact of a MVP 17 project package?

Make them disclose the high capacity of the line! Report EMF levels for full capacity? What about corona/ultra violet emissions and cancer?

How will a private non-utility obtain any land to expand the right of way? A private purpose doesn't qualify for eminent domain!

## DEIS Comments due 4:30 p.m. on May 9, 2014 Send comments to <a href="mailto:raymond.kirsch@state.mn.us">raymond.kirsch@state.mn.us</a>

To see the DEIS, go to eDockets, www.puc.state.mn.us, then click blue "Search eDockets," enter the year "12" and the docket number, either "1053" or "1337" and click "Search." To get notice of all filings, subscribe. At the docket page, click a box in the "Subscribe" column, click "Subscribe" and follow directions with email and docket.

Carol A. Overland, Attorney at Law, overland@legalectric.org, representing

Citizens Energy Task Force and No CapX2020

Visit www.cetf.us and www.nocapx2020.info