

**Appendix E - Minnesota Public Utilities Commission  
September 25, 2025 Draft Application Review  
Comments and Applicants' Response**



September 25, 2025

Mark Strohfus  
Project Manager, Transmission Permitting  
Great River Energy  
12300 Elm Creek Blvd.  
Maple Grove, MN 55369

MStrohfus@GREnergy.com

RE: Draft Application Review  
Otto Tap 115 kV Transmission Line Project  
Docket No. ET2/TL-25-269

Dear Mr. Strohfus

As required by Minn. Stat. 216I.05, subd. 6, applicants requesting a site or route permit from the Minnesota Public Utilities Commission (Commission) must provide a draft of the application, including the required environmental assessment information, to Commission staff prior to filing the application. On August 5, 2025, Great River Energy, on behalf of itself and co-applicant Lake Region Electric Cooperative (collectively, Applicants) provided Commission Energy Infrastructure Permitting (EIP) staff with a draft of the route permit application for the Otto Tap 115 kV Transmission Line Project, a 2.9 mile 115 kV transmission line and a new Otto Tap Substation in Otter Tail County.

Attached are EIP staff comments on the draft application and a copy of the Commission's sample permit for high voltage transmission lines. As required by Minn. Stat. 211.05, subd. 6(b), EIP staff's comments are focused on the completeness of the application and clarifications that may assist the Commission's review of the application. EIP staff's review of the draft application is informed by *Commission's Draft Application Guidance for Large Energy Infrastructure Facilities in Minnesota*, available on the Commission's website (<https://puc.eip.mn.gov/>).

Please let me know if you have questions or would like to discuss these comments further.

Sincerely,

A handwritten signature in cursive script that reads 'Suzanne Steinhauer'.

Suzanne Steinhauer  
Environmental Review Manager

## Draft Application Review

**Project:** Otto Tap 115 kV Transmission Line Project

**Docket:** ET2/25-269

**Date:** September 25, 2025

Great River Energy, on behalf of itself and co-applicant Lake Region Electric Cooperative (collectively, Applicants) provided a draft application for the Otto Tap 115 kV Transmission Project (Project) on August 5, 2025. The Project consists of approximately 2.9 miles of 115 kV high voltage transmission line and a new Otto Tap Substation in Otter Tail County, Minnesota.

Minnesota Public Utilities Commission (Commission) Environmental Infrastructure Permitting (EIP) staff appreciates the opportunity to review the draft application. EIP staff's review of the application is guided by the Commission's Draft Application Guidance.<sup>1</sup>

Although the draft included much of the information required by Minnesota Statute §216I, and Minnesota Rules, Chapter 7850, EIP staff recommends when you file the application in eDockets that you incorporate several revisions to clarify the project proposed, the potential impacts, and potential mitigation measures to avoid, minimize, and otherwise mitigate impacts. These clarifications are intended to assist the Commission's review of the application, including the environmental assessment. More detail on recommendations is included in a redline that accompanies this letter and in the following table. General recommendations that apply to the document as a whole include:

- Include figures and maps in the application to help readers understand the proposed project.
- Organize the discussion of potential impacts that will occur from the project followed by a discussion of potential mitigation measures with document headers that are navigable in the PDF document.
- Use active language to clarify who will be taking what actions. For example, instead of "Ruts that are hazardous to agricultural operations will be repaired or compensation will be provided as an alternative if the landowner desires" clarify who will be responsible by using active voice language, e.g. "Great River Energy or its contractors will repair ruts or provide compensation to the landowner depending upon landowner preferences."
- Clarify mitigation measures required by standard conditions in the Commission's sample route permit. Follow these with a discussion of any additional mitigation measures that the applicants will commit to employing beyond the required mitigation measures. Staff has included a sample high voltage transmission line permit for the applicants' use in identifying standard permit conditions.

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<sup>1</sup> Minnesota Public Utility Commission, *Draft Application Guidance for Large Energy Infrastructure Facilities in Minnesota: Minnesota Public Utilities Commission Guidance for Preparing Site and Route Permit Applications for Large Energy Infrastructure Facilities*, April 2025, <https://puc.eip.mn.gov/node/12606>

- Where appropriate, include a discussion of the Project’s design elements (e.g., following road rights-of-way or use of single poles rather than a horizontal configuration) that mitigate potential impacts.
- Ensure the appendices are named the same in the documents (table of contents and text) as they are in the covers.

Minn. Stat. § 216I.05, subd. 11 addresses the factors the Commission must consider in determining whether to issue a permit. Chapter 7 of the draft application addresses the application of routing criteria within Minn. Stat. § 216I.05, subd. 11 and asserts that the Project meets the statutory routing criteria. The responsibility for determining whether a proposed facility meets the statutory routing criteria lies with the Commission, not with the applicants.

In the draft application, the applicants’ assertion that the Project meets the routing criteria immediately follows the environmental assessment portion of the document. The environmental assessment is intended to be an objective analysis of the project, so the placement of this assertion immediately following the environmental assessment portion of the application is confusing and could be read as the Commission’s assessment of the project. Staff recommends that the application filed in eDockets either remove this section or place the applicants’ analysis of consistency with the routing factors in a different location before the environmental assessment.

**Table 1. Application Completeness Requirements**

Topic	Statutory Requirement	Location in Document
<b>Project ownership</b>	<b>216I.05, subd. 3(b)(1)</b>	<b>1.2</b>
EIP staff provided some edits for clarity in the redline but generally meets staff expectations. The Project will be jointly owned by Great River Energy and Lake Region Electric Cooperative. Respective ownerships of project components are identified in Section 1.2		
<b>Permittee name</b>	<b>216I.05, subd. 3(b)(2)</b>	<b>1.3</b>
Meets staff expectations. Great River Energy and Lake Region Electric Cooperative will both be permittees.		
<b>Project description</b>	<b>216I.05, subd. 3(b)(3)</b>	<b>1.5, 3.1, 3.2</b>
EIP staff provided some edits for clarity in the redline. EIP staff recommends the following modifications to clarify the Project: <ul style="list-style-type: none"> <li>• Include a map in the introduction, either in Section 1 or 1.4.</li> <li>• Define the route and right-of-way widths earlier in the document.</li> <li>• Include graphics to illustrate alignment, ROW, and route concepts.</li> <li>• Clarify the relationship between the “new Otto Substation” and the existing Otto Substation. Reviewers were unclear as to whether the new substation will replace the existing substation or whether the existing substation would continue to operate adjacent to the new substation.</li> </ul>		

Topic	Statutory Requirement	Location in Document
<b>Environmental Information, generally</b>	<b>216I.05, subd. 3(b)(4) and subd. 4(a)</b>	<b>Section 6</b>
<p>See discussion in specific resource areas in the redline copy of the application. Staff requests the application filed in eDockets include a chapter of references that includes the sources used in footnotes as well as other sources used to prepare the application.</p>		
<b>Identification of Property Owners</b>	<b>216I.05, subd. 3(b)(5), as described in 216I.05, subd. 8 (3)</b>	<b>Appendix C</b>
<p>Although Appendix C identifies property owners along the 470<sup>th</sup> Avenue Route alternative, it is unclear whether these are the same landowners along the proposed route. Staff recommends identifying the property owners in a separate appendix from the agency and tribal coordination appendices.</p>		
<b>Maps</b>	<b>216I.05, subd. 3(b)(6)</b>	<b>Unlabeled Appendix</b>
<p>Staff provides detailed comments on individual maps in the redline copy of the application. Additionally, staff recommends the application filed in eDockets:</p> <ul style="list-style-type: none"> <li>• Embed maps in the application to help readers understand and visualize the project and its alternatives.             <ul style="list-style-type: none"> <li>○ Include maps illustrating the project (similar to maps 1 and 3) early in the document (Sections 1 or 1.4) and</li> <li>○ Include a map for the route alternative considered but rejected in Section 4 of the application. This map should show only the rejected route – it’s confusing to also include the proposed project. As it’s currently mapped (Map 4), it’s difficult to see the different route widths when there are two alignments overlapping.</li> </ul> </li> <li>• Check the resolution on the maps, both the embedded maps and those in appendices. This main map of the project location should have better resolution, so the legend items are legible.</li> <li>• Use “anticipated alignment” rather than “centerline” in map labels. Centerline implies that the alignment is always in the center of the route width, which is not true in this case.</li> <li>• Make the GRE LR-OTT 41.6 kV line more visible (e.g., using a callout box, different symbology or line weight, etc.).</li> <li>• Ensure it is clear in Map 3 whether the new Otto Sub is an expansion of an existing sub or whether there would be two substations.</li> <li>• Include overview and resource maps in an appendix separate from the detailed route maps.</li> </ul>		
<b>Existing ROWs</b>	<b>216I.05, subd. 3(b)(7)</b>	<b>3.1.3</b>
<p>EIP staff does not believe this section as drafted fully addresses the statutory requirement that the application contain a document identifying existing utility and public rights-of-way along or near large energy facilities.</p> <p>EIP staff recommends the application filed in eDockets provide a more general discussion of the utility and public ROWs (e.g. road ROWs in the area vary between 66 feet on township roads and 150 feet for US Highway 10) in the area considered for the route either here or in Chapter 4 (Route Alternatives).</p>		

Topic	Statutory Requirement	Location in Document
Following a general discussion of utility and public ROWs, discuss how the Project’s alignment and ROW interacts with road ROWs and include a figure to illustrate this.		
<b>Project design, including required ancillary facilities</b>	<b>216I.05, subd. 3(b)(8)</b>	<b>3.1, 3.2, 5.1, 5.2</b>
<p>The draft application is generally consistent with EIP staff expectations, but EIP staff recommends the application filed in eDockets include:</p> <ul style="list-style-type: none"> <li>• Clarify the relationship between the new Otto Substation and the existing Otto Substation. Some sections in the draft application are unclear about whether the new substation will replace the existing substation, or whether the new substation will be built adjacent to the existing substation and both will continue operation.</li> <li>• An illustration of a transmission structure with underbuilt distribution in the body of the application.</li> <li>• An illustration of alignment, right-of-way, and route in the body of the application.</li> <li>• Describe in greater detail how the Project’s alignment and ROW interacts with road ROWs with an illustration in the body of the application.</li> </ul>		
<b>Project cost</b>	<b>216I.05, subd. 3(b)(9)</b>	<b>3.3</b>
If the existing Otto Substation will be decommissioned, clarify whether the Project cost estimate includes the cost for decommissioning. Otherwise meets staff expectations.		
<b>Design for expansion</b>	<b>216I.05, subd. 3(b)(10)</b>	<b>3.1.12</b>
Meets staff expectations.		
<b>Site or ROW acquisition, construction, maintenance, &amp; restoration</b>	<b>216I.05, subd. 3(b)(11)</b>	<b>5.1 and 5.2</b>
EIP staff provided some edits for clarity in the redline copy of the application, otherwise the discussion meets staff expectations.		
<b>Other Permits</b>	<b>216I.05, subd. 3(b)(12)</b>	<b>2.4</b>
Clarify whether a driveway permit to the tap location is required from the Minnesota Department of Transportation and whether the revised Otto Substation will require a new driveway/access point or will use the existing access off 390 <sup>th</sup> Street. Otherwise meets staff expectations.		
<b>CN Requirement</b>	<b>216I.05, subd. 3(b)(13)</b>	<b>2.1</b>
Meets staff expectations; a Certificate of Need is not required for the Project.		
<b>Other sites or routes considered</b>	<b>216I.05, subd. 3(b)(14)</b>	<b>4.0</b>

Topic	Statutory Requirement	Location in Document
Staff recommends additional clarification about the differences between the 470 <sup>th</sup> Avenue Route Alternative and the Proposed Route and the reasons the applicants prefer the Proposed Route, particularly in relation to the switch near the railroad.		
<b>Additional information required by rule</b>	<b>216I.05, subd. 3(b)(15)</b>	n/a
Staff recommends the applicants clarify whether the project avoids the prohibited routes identified in Minn. R. 7850.4300.		
<b>Tribal coordination</b>	<b>216I.05, subd. 3(b)(16)</b>	<b>Appendix C</b>
<p>The Commission’s July 2025 <a href="#">Guidance for Successful Tribal Engagement</a> (Tribal guidance) is on the Commission’s website. Staff requests the applicant provide notification to those listed in the eDockets service lists "Tribal Government Contacts" and "Tribal Historic Preservation Officers," as recommended in the Commission’s Tribal guidance. This standard will promote consistency for applicants and is the best way to ensure contacts that are used are up to date. The draft application indicates the applicants have initiated coordination with all 11 Minnesota Tribal Governments and have had further correspondence with three of these tribes at the time of the draft.</p> <p>As discussed in the Commission’s Tribal guidance, a single email or postal letter about a project does not suffice as coordination. Applicants must document that they have made reasonable efforts to coordinate with each tribe with multiple methods and attempts when a response isn’t received. Staff requests the applicants reach out again to the Tribal Historic Preservation Officers for the eight Minnesota tribes who did not respond with a follow up email and, if that is not successful, a phone call. Document these attempts for inclusion in the filed application.</p>		
<b>Preapplication Coordination (LGUs)</b>	<b>216I.05, subd. 5 (1)</b>	<b>Appendix C</b>
<b>Local Governmental Units were properly notified on May 12, 2025, via email as denoted in Appendix C.</b>		
<b>Preapplication Coordination (State Technical Resource Agencies)</b>	<b>216I.05, subd. 5 (3)</b>	<b>Appendix C</b>
Staff requests the applicants ensure that notice is provided to the “Agency Reps” service list in eDockets. Each State Technical Resource Agency identified in this service list will determine its preapplication coordination procedures.		
<b>Environmental setting</b>	<b>216I.05, subd. 4(a)(1)</b>	<b>6.3</b>
Staff provided technical edits in the redline copy of the application to improve clarity. Otherwise meets staff expectations.		
<b>Human settlement, generally</b>	<b>216I.05, subd. 4(2)</b>	<b>6.4</b>
See comments on specific resource sections.		

Topic	Statutory Requirement	Location in Document
<b>Public health &amp; safety including EMF</b>	<b>216I.05, subd. 11(b)(1) (Decision Criteria)</b>	<b>3.1.7; 6.5; 6.5.2</b>
<p>Staff recommends the applicants clarify the responsible party implementing health and safety measures and provide examples of safety measures the applicants will employ to ensure public safety in Section 3.16/3.17 (Safety Equipment and Plans).</p>		
<b>Displacement</b>	<b>216I.05, subd. 4(a)(2)</b>	<b>6.4.3</b>
<p>Staff provided technical edits in the redline copy of the application to improve clarity of this section. Otherwise, the section meets staff expectations.</p>		
<b>Noise</b>	<b>216I.05, subd. 4(a)(2)</b>	<b>6.4.6</b>
<p>Staff provided technical edits and comments in the redline copy of the application to improve the clarity of this section. Staff recommends the application filed in eDockets include complete footnotes for the sources of information on which the assessment is based.</p>		
<p>Staff also recommends the application filed in eDockets discuss mitigation measures required by the Commission’s sample permit as well as mitigation measures permittees will implement above and beyond the sample permit’s requirements.</p>		
<b>Aesthetics</b>	<b>216I.05, subd. 4(a)(2) 216I.19 (turbine lighting)</b>	<b>6.4.1</b>
<p>Staff provided technical edits and comments in the redline copy of the application to improve the clarity of this section.</p>		
<p>Staff recommends the application filed in eDockets discuss mitigation measures required by the Commission’s sample permit as well as mitigation measures permittees will implement above and beyond the sample permit’s requirements.</p>		
<b>Socioeconomic Impacts</b>	<b>216I.05, subd. 4(a)(2); 216I.05, subd. 11(b)(14)</b>	<b>6.4.9</b>
<p>Staff provided technical edits and comments in the redline copy of the application to improve the clarity of this section</p>		
<p>Staff recommends the applicants make a separate section to discuss property values and provided links to a recent compilation of the research and literature concerning transmission line impacts to property values.</p>		
<p>Staff also recommends the application filed in eDockets discuss mitigation measures required by Commission permits as well as mitigation measures permittees will implement above and beyond permit requirements.</p>		
<b>Environmental Justice Impacts</b>	<b>216I.05, subd. 4(a)(2); 216I.05, subd. 11(a)(3)</b>	<b>6.4.4</b>
<p>Meets staff expectations. None of the census tracts within the project area are considered environmental justice communities under the definition provided in Minn. Stat. § 216B.1691, subd. 1(e).</p>		

Topic	Statutory Requirement	Location in Document
<b>Cultural Values</b>	<b>216I.05, bud. 4(a) (2)</b>	<b>6.4.2</b>
<p>Staff provided technical edits and comments in the redline copy of the application to improve the clarity of this section</p> <p>Staff recommends the application filed in eDockets discuss mitigation measures required by the Commission’s sample permit as well as mitigation measures permittees will implement above and beyond the sample permit’s requirements</p>		
<b>Recreation</b>	<b>216I..05, subd. 4(a)(2)</b>	<b>6.4.8</b>
<p>Staff provided technical edits and comments in the redline copy of the application to improve the clarity of this section</p> <p>Staff recommends the application filed in eDockets identify whether the proposed route crosses any snowmobile trails.</p> <p>Staff recommends the application filed in eDockets discuss mitigation measures required by the Commission’s sample permit as well as mitigation measures permittees will implement above and beyond the sample permit’s requirements</p>		
<b>Public Services</b>	<b>216I..05, subd. 4(a)(2)</b>	<b>6.4.7</b>
<p>Staff provided technical edits and comments in the redline copy of the application to improve the clarity of this section.</p> <p>Staff recommends the application filed in eDockets discuss mitigation measures required by the Commission’s sample permit as well as mitigation measures permittees will implement above and beyond the sample permit’s requirements.</p>		
<b>Land Use</b>	<b>216I.05, subd. 11(a) (2)</b>	<b>6.4.5</b>
<p>Staff provided technical edits and comments in the redline copy of the application to improve the clarity of this section Staff recommends relocating the brief section “Public and Designated Lands” to the land use section.</p> <p>Staff recommends the application filed in eDockets expand its discussion of mitigation measures that minimize land use conflicts.</p>		
<b>Land-based economics, generally</b>	<b>216I.05, subd. 4(a)(3)</b>	<b>6.6</b>
<p>See comments on specific resource sections in the redline copy of the application.</p>		
<b>Agriculture</b>	<b>216I.05, subd. 4(3); 216I.05, subd. 11(b)(5) and (9); see also Minn. R. 7850.4400, subp. 4.</b>	<b>6.6.1</b>

Topic	Statutory Requirement	Location in Document
Staff recommends applicants add additional discussion of the potential for induction between the Project and the irrigation systems and mitigation measures to avoid this potential impact.		
<b>Forestry</b>	<b>216I.05, subd. 4(3)</b>	<b>6.6.2</b>
Staff provided technical edits and comments in the redline copy of the application to improve the clarity of this section		
Staff recommends the application filed in eDockets clarify that, although the project may result in some tree clearing, the project will not impact commercial forestry.		
<b>Mining</b>	<b>216I.05, subd. 4(a)(3)</b>	<b>6.6.3</b>
Meets staff expectations, the project is not expected to impact mining operations.		
<b>Tourism</b>	<b>216I.05, subd. 4(a)(3)</b>	<b>6.6.4</b>
Meets staff expectations, the project is not expected to materially impact tourism in the project area.		
<b>Archaeological &amp; historic resources</b>	<b>216I.05, subd. 4(4)</b>	<b>6.7</b>
Staff provided technical edits and comments in the redline copy of the application to improve the clarity of this section.		
Staff recommends the application filed in eDockets discuss mitigation measures required by the Commission’s sample permit as well as mitigation measures permittees will implement above and beyond the sample permit’s requirements.		
<b>Natural environment impacts - generally</b>	<b>216I.05, subd. 4(5)</b>	<b>6.8</b>
See resource-specific discussions.		
<b>Air quality</b>	<b>216I.05, subd. 4(a)(5)</b>	<b>6.8.1</b>
Staff provided technical edits and comments in the redline copy of the application to improve the clarity of this section and documentation.		
Staff recommends the application filed in eDockets discuss mitigation measures required by the Commission’s sample permit as well as mitigation measures permittees will implement above and beyond the sample permit’s requirements.		
<b>Geology and Groundwater</b>	<b>216I.05, subd. 4(a)(5); 216I.05, subd. 11(b)(1)</b>	<b>6.8.4, 6.8.8</b>
The discussion of geology and topography meets staff expectations; the project is not anticipated to impact subsurface geology or topography.		

Topic	Statutory Requirement	Location in Document
<p>Staff provided technical edits and comments in the redline copy of the application to improve the clarity of the groundwater section. Staff recommends the water resource section (including groundwater) be reorganized by resource (e.g. groundwater resource description, impacts, and mitigation) rather than the organization in the draft application which separates the resource descriptions from the impacts and mitigation discussion.</p> <p>Staff recommends the application filed in eDockets discuss mitigation measures required by the Commission’s sample permit as well as mitigation measures permittees will implement above and beyond the sample permit’s requirements.</p>		
<b>Soils</b>	<b>216I.05, subd. 11(b)(1) and subd. 11(b)(5)</b>	<b>6.8.6</b>
<p>Staff provided technical edits and comments in the redline copy of the application to improve the clarity of this section.</p> <p>Staff recommends the application filed in eDockets discuss mitigation measures required by the Commission’s sample permit as well as mitigation measures permittees will implement above and beyond the sample permit’s requirements.</p>		
<b>Surface waters (including stormwater, floodplains, and wetlands)</b>	<b>216I.05, subd. 4(5); 216I.05, subd. 11(b)(1)</b>	<b>6.8.8</b>
<p>Staff provided technical edits and comments in the redline copy of the application to improve the clarity of this section Staff recommends the water resource section (including groundwater) be reorganized by resource (e.g. surface waters resource description, impacts, and mitigation) rather than the organization in the draft application which separates the resource descriptions from the impacts and mitigation discussion.</p> <p>Staff recommends the application filed in eDockets discuss mitigation measures required by the Commission’s sample permit as well as mitigation measures permittees will implement above and beyond the sample permit’s requirements.</p>		
<b>Vegetation</b>	<b>216I.05, subd. 4(5)</b>	<b>6.8.7</b>
<p>Staff provided technical edits and comments in the redline copy of the application to improve the clarity of this section</p> <p>Staff recommends the application filed in eDockets discuss mitigation measures required by the Commission’s sample permit as well as mitigation measures permittees will implement above and beyond the sample permit’s requirements.</p>		
<b>Wildlife</b>	<b>216I.05, subd. 4(5)</b>	<b>6.8.9</b>
<p>Staff provided technical edits and comments in the redline copy of the application to improve the clarity of this section. Staff recommends that the final application include a brief discussion on the potential for habitat fragmentation.</p>		

Topic	Statutory Requirement	Location in Document
<p>Staff recommends the application filed in eDockets discuss mitigation measures required by the Commission’s sample permit as well as mitigation measures permittees will implement above and beyond the sample permit’s requirements.</p>		
<b>Rare and unique resources</b>	<b>subd. 4(8)</b>	<b>6.8.5</b>
<p>Staff provided technical edits and comments to improve the clarity of this section.</p> <p>Staff recommends the application filed in eDockets discuss mitigation measures required by the Commission’s sample permit as well as mitigation measures permittees will implement above and beyond the sample permit’s requirements.</p>		
<b>Greenhouse gases</b>	<b>216I.05, subd. 4(6)</b>	<b>6.8.3</b>
<p>Staff provided technical edits and comments in the redline copy of the application to improve the clarity of this section</p> <p>Staff recommends the application filed in eDockets discuss mitigation measures required by the Commission’s sample permit as well as mitigation measures permittees will implement above and beyond the sample permit’s requirements.</p>		
<b>Climate change resilience</b>	<b>216I.05, subd. 4(7)</b>	<b>6.8.2</b>
<p>Staff provided technical edits and comments in the redline copy of the application to improve the clarity of this section</p> <p>Staff recommends the application filed in eDockets discuss mitigation measures required by the Commission’s sample permit as well as mitigation measures permittees will implement above and beyond the sample permit’s requirements. Staff also recommends the final application expand on the discussion of Great River Energy’s ongoing transmission resilience improvements in the mitigation discussion.</p>		
<b>Unavoidable Impacts</b>	<b>216I.05, subd. 4(9)</b>	<b>6.9</b>
<p>Staff provided technical edits and comments in the redline copy of the application to improve the clarity of this section</p> <p>Staff recommends the application filed in eDockets discuss mitigation measures required by the Commission’s sample permit as well as mitigation measures permittees will implement above and beyond the sample permit’s requirements.</p>		
<b>Irretrievable and Irreversible Impacts</b>	<b>216I.05, subd. 11(b)(11)</b>	<b>6.10</b>
<p>Staff provided technical edits and comments in the redline copy of the application to improve the clarity of this section.</p>		

Topic	Statutory Requirement	Location in Document
<p>Staff recommends the application filed in eDockets discuss mitigation measures required by the Commission’s sample permit as well as mitigation measures permittees will implement above and beyond the sample permit’s requirements.</p>		
<b>Cumulative Potential Effects</b>	<b>216I.05, subd. 11(a)(2) and (b)(2)</b>	n/a
<p>The Commission is charged with evaluating the potential human and environmental impacts of sites and routes including impacts related to possible future development or expansion in the project area. Staff interprets this charge to be an evaluation of cumulative potential effects associated with the Project. The draft application does not include a discussion of cumulative potential effects</p> <p>EIP staff recommends the application filed in eDockets discuss reasonably foreseeable projects in the vicinity of the Project and the potential interactions between the Project and other reasonably foreseeable projects with respect to human and environmental impacts.</p>		
<b>Mitigation Measures</b>	<b>216I.05, subd. 4(10)</b>	<b>Section 6</b>
<p>Staff provided comments on mitigation in each resource sections in the redline copy of the application. In general, staff recommends that the application filed in eDockets discuss mitigation measures typically required by Commission permits as well as mitigation measures permittees will implement above and beyond permit requirements.</p>		

**Great River Energy – Otto Tap 115 kV Transmission Line Project**  
 Response to Minnesota Public Utilities Commission Energy Infrastructure Permitting Staff’s  
 September 25, 2025 Comments (Table 1 - Application Completeness Requirements) on the August 5, 2025 Draft Application

Topic	Statutory Requirement	Location in Document	App. Response
<b>Project ownership</b>	<b>216I.05, subd. 3(b)(1)</b>	<b>1.2</b>	
EIP staff provided some edits for clarity in the redline but generally meets staff expectations. The Project will be jointly owned by Great River Energy and Lake Region Electric Cooperative. Respective ownerships of project components are identified in Section 1.2.			Applicants have reviewed all redline comments and have incorporated redlines as appropriate.
<b>Permittee name</b>	<b>216I.05, subd. 3(b)(2)</b>	<b>1.3</b>	
Meets staff expectations. Great River Energy and Lake Region Electric Cooperative will both be permittees.			N/A
<b>Project description</b>	<b>216I.05, subd. 3(b)(3)</b>	<b>1.5, 3.1, 3.2</b>	
<p>EIP staff provided some edits for clarity in the redline. EIP staff recommends the following modifications to clarify the Project:</p> <ul style="list-style-type: none"> <li>• Include a map in the introduction, either in Section 1 or 1.4.</li> <li>• Define the route and right-of-way widths earlier in the document.</li> <li>• Include graphics to illustrate alignment, ROW, and route concepts.</li> <li>• Clarify the relationship between the “new Otto Substation” and the existing Otto Substation. Reviewers were unclear as to whether the new substation will replace the existing substation or whether the existing substation would continue to operate adjacent to the new substation.</li> </ul>			<p>Applicants have reviewed all redline comments and have incorporated redlines as appropriate.</p> <ul style="list-style-type: none"> <li>• Figure 1 is now introduced in Section 1.1.</li> <li>• Route and right-of-way widths are introduced in Section 1.5.</li> <li>• The new Figures 4 and 5 are illustrative of alignment, right-of-way, and route concepts.</li> <li>• Clarity regarding the new Otto Substation was included throughout the document.</li> </ul>
<b>Environmental Information, generally</b>	<b>216I.05, subd. 3(b)(4) and subd. 4(a)</b>	<b>Section 6</b>	
See discussion in specific resource areas in the redline copy of the application. Staff requests the application filed in eDockets include a chapter of references that includes the sources used in footnotes as well as other sources used to prepare the application.			Applicant has moved the references out of the footnotes and into a new Chapter 7.

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<b>Identification of Property Owners</b>	<b>216I.05, subd. 3(b)(5)</b> , as described in 216I.05, subd. 8 (3)	<b>Appendix C</b>	
Although Appendix C identifies property owners along the 470 <sup>th</sup> Avenue Route alternative, it is unclear whether these are the same landowners along the proposed route. Staff recommends identifying the property owners in a separate appendix from the agency and tribal coordination appendices.			Property owners are now presented in Appendix F, separate from information on agency and Tribal coordination in Appendices C and D, respectively.
<b>Maps</b>	<b>216I.05, subd. 3(b)(6)</b>	<b>Unlabeled Appendix</b>	
<p>Staff provides detailed comments on individual maps in the redline copy of the application. Additionally, staff recommends the application filed in eDockets:</p> <ul style="list-style-type: none"> <li>• Embed maps in the application to help readers understand and visualize the project and its alternatives.               <ul style="list-style-type: none"> <li>○ Include maps illustrating the project (similar to maps 1 and 3) early in the document (Sections 1 or 1.4) and</li> <li>○ Include a map for the route alternative considered but rejected in Section 4 of the application. This map should show only the rejected route – it’s confusing to also include the proposed project. As it’s currently mapped (Map 4), it’s difficult to see the different route widths when there are two alignments overlapping.</li> </ul> </li> <li>• Check the resolution on the maps, both the embedded maps and those in appendices. This main map of the project location should have better resolution, so the legend items are legible.</li> <li>• Use “anticipated alignment” rather than “centerline” in map labels. Centerline implies that the alignment is always in the center of the route width, which is not true in this case.</li> <li>• Make the GRE LR-OTT 41.6 kV line more visible (e.g., using a callout box, different symbology or line weight, etc.).</li> <li>• Ensure it is clear in Map 3 whether the new Otto Sub is an expansion of an existing sub or whether there would be two substations.</li> </ul> <p>Include overview and resource maps in an appendix separate from the detailed route maps.</p>			<p>Applicant addressed map comments provided in the redline.</p> <ul style="list-style-type: none"> <li>• Maps have been embedded in the application</li> <li>• The project introduction map is presented as Figure 1 in Section 1.1.</li> <li>• Figure 7 in Section 4 now only shows the Rejected Route Alternative.</li> <li>• Maps have been checked for legibility.</li> <li>• The term “centerline” has been removed, and “alignment” is used.</li> <li>• The GRE LR-OTT 41.6 kV uses a different symbology.</li> <li>• Figure 3 clarifies that the old substation will be removed, and a new substation will be built.</li> </ul> <p>The first bullet comment in this row asked for maps to be embedded in the application, therefore the Applicant did not prepare an Appendix for overview and resource maps due to the relatively short length of this line. Detailed route maps are separate, in Appendix B.</p>
<b>Existing ROWs</b>	<b>216I.05, subd. 3(b)(7)</b>	<b>3.1.3</b>	

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<p>EIP staff does not believe this section as drafted fully addresses the statutory requirement that the application contain a document identifying existing utility and public rights-of-way along or near large energy facilities. EIP staff recommends the application filed in eDockets provide a more general discussion of the utility and public ROWs (e.g. road ROWs in the area vary between 66 feet on township roads and 150 feet for US Highway 10) in the area considered for the route either here or in Chapter 4 (Route Alternatives). Following a general discussion of utility and public ROWs, discuss how the Project’s alignment and ROW interacts with road ROWs and include a figure to illustrate this.</p>			<p>The Applicant has added additional details regarding collocation with public rights of way. See Sections 3.1.2, 4.2.1, and 5.1.3. Detailed route maps in Appendix B have been zoomed in to more clearly show the Project’s relationship to existing roads.</p> <p>The Applicant has created Figure 5 to present a conceptual arrangement of the 100-foot-wide ROW and transmission line alignment relative to road right-of-way.</p>
<b>Project design, including required ancillary facilities</b>	<b>216I.05, subd. 3(b)(8)</b>	<b>3.1, 3.2, 5.1, 5.2</b>	
<p>The draft application is generally consistent with EIP staff expectations, but EIP staff recommends the application filed in eDockets include:</p> <ul style="list-style-type: none"> <li>• Clarify the relationship between the new Otto Substation and the existing Otto Substation. Some sections in the draft application are unclear about whether the new substation will replace the existing substation, or whether the new substation will be built adjacent to the existing substation and both will continue operation.</li> <li>• An illustration of a transmission structure with underbuilt distribution in the body of the application.</li> <li>• An illustration of alignment, right-of-way, and route in the body of the application.</li> <li>• Describe in greater detail how the Project’s alignment and ROW interacts with road ROWs with an illustration in the body of the application.</li> </ul>			<ul style="list-style-type: none"> <li>• Clarity regarding the new Otto Substation was included throughout the document.</li> <li>• Figure 6 depicts a 115 kV transmission structure with three phase distribution underbuild.</li> <li>• Figure 4 presents an illustration of alignment, right-of-way, and route.</li> <li>• The Applicant has created Figure 5 to present a conceptual arrangement of the 100-foot-wide ROW and transmission line alignment relative to road right-of-way.</li> <li>• The Applicant has added additional details regarding collocation with public rights of way. See Sections 3.1.2, 4.2.1, and 5.1.3.</li> </ul>
<b>Project cost</b>	<b>216I.05, subd. 3(b)(9)</b>	<b>3.3</b>	
<p>If the existing Otto Substation will be decommissioned, clarify whether the Project cost estimate includes the cost for decommissioning. Otherwise meets staff expectations.</p>			<p>The costs include decommissioning. Text has been added to Section 3.3.</p>

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Design for expansion	216I.05, subd. 3(b)(10)	3.1.12	
Meets staff expectations.			N/A
Site or ROW acquisition, construction, maintenance, & restoration	216I.05, subd. 3(b)(11)	5.1 and 5.2	
EIP staff provided some edits for clarity in the redline copy of the application, otherwise the discussion meets staff expectations.			Applicants have reviewed all redline comments and have incorporated redlines as appropriate.
Other Permits	216I.05, subd. 3(b)(12)	2.4	
Clarify whether a driveway permit to the tap location is required from the Minnesota Department of Transportation and whether the revised Otto Substation will require a new driveway/access point or will use the existing access off 390 <sup>th</sup> Street. Otherwise meets staff expectations.			Access to the switch will be off 480 <sup>th</sup> Avenue; a MnDOT driveway permit would not be required. See discussion in Section 3.1.5.  The new Otto Substation will not require a driveway access permit; the same access will be used. See Section 3.2.1.
CN Requirement	216I.05, subd. 3(b)(13)	2.1	
Meets staff expectations; a Certificate of Need is not required for the Project.			N/A
Other sites or routes considered	216I.05, subd. 3(b)(14)	4.0	
Staff recommends additional clarification about the differences between the 470 <sup>th</sup> Avenue Route Alternative and the Proposed Route and the reasons the applicants prefer the Proposed Route, particularly in relation to the switch near the railroad.			The Applicant added additional text to Section 4.2 and 4.3.

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<b>Additional information required by rule</b>	<b>216I.05, subd. 3(b)(15)</b>		n/a	
Staff recommends the applicants clarify whether the project avoids the prohibited routes identified in Minn. R. 7850.4300.				The Applicant added additional text to Section 6.4.5.1.
<b>Tribal coordination</b>	<b>216I.05, subd. 3(b)(16)</b>		<b>Appendix C</b>	
<p>The Commission’s July 2025 <a href="#">Guidance for Successful Tribal Engagement</a> (Tribal guidance) is on the Commission’s website. Staff requests the applicant provide notification to those listed in the eDockets service lists "Tribal Government Contacts" and "Tribal Historic Preservation Officers," as recommended in the Commission’s Tribal guidance. This standard will promote consistency for applicants and is the best way to ensure contacts that are used are up to date. The draft application indicates the applicants have initiated coordination with all 11 Minnesota Tribal Governments and have had further correspondence with three of these tribes at the time of the draft. As discussed in the Commission’s Tribal guidance, a single email or postal letter about a project does not suffice as coordination. Applicants must document that they have made reasonable efforts to coordinate with each tribe with multiple methods and attempts when a response isn’t received. Staff requests the applicants reach out again to the Tribal Historic Preservation Officers for the eight Minnesota tribes who did not respond with a follow up email and, if that is not successful, a phone call. Document these attempts for inclusion in the filed application.</p>				The Applicant has provided additional details about coordination with Tribes, including additional outreach since submittal of the draft application. See discussion in Section 1.8.2 and Appendix D.
<b>Preapplication Coordination (LGUs)</b>	<b>216I.05, subd. 5 (1)</b>		<b>Appendix C</b>	
Local Governmental Units were properly notified on May 12, 2025, via email as denoted in Appendix C.				N/A
<b>Preapplication Coordination (State Technical Resource Agencies)</b>	<b>216I.05, subd. 5 (3)</b>		<b>Appendix C</b>	

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Staff requests the applicants ensure that notice is provided to the “Agency Reps” service list in eDockets. Each State Technical Resource Agency identified in this service list will determine its preapplication coordination procedures.			The Applicant has provided additional details about coordination with Agency Reps, including additional outreach since submitting the draft application. See discussions in Section 1.8.2 and Appendix C.
<b>Environmental setting</b>	<b>216I.05, subd. 4(a)(1)</b>	<b>6.3</b>	
Staff provided technical edits in the redline copy of the application to improve clarity. Otherwise meets staff expectations.			Applicants have reviewed all redline comments and have incorporated redlines as appropriate.
<b>Human settlement, generally</b>	<b>216I.05, subd. 4(2)</b>	<b>6.4</b>	
See comments on specific resource sections.			Applicants have reviewed all redline comments and have incorporated redlines as appropriate.
<b>Public health &amp; safety including EMF</b>	<b>216I.05, subd. 11(b)(1) (Decision Criteria)</b>	<b>3.1.7; 6.5; 6.5.2</b>	
Staff recommends the applicants clarify the responsible party implementing health and safety measures and provide examples of safety measures the applicants will employ to ensure public safety in Section 3.16/3.17 (Safety Equipment and Plans).			Applicants have clarified responsibilities in the newly-numbered Section 3.1.7 (Safety Equipment and Plans).
<b>Displacement</b>	<b>216I.05, subd. 4(a)(2)</b>	<b>6.4.3</b>	
Staff provided technical edits in the redline copy of the application to improve clarity of this section. Otherwise, the section meets staff expectations.			Applicants have reviewed all redline comments and have incorporated redlines as appropriate.
<b>Noise</b>	<b>216I.05, subd. 4(a)(2)</b>	<b>6.4.6</b>	

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<p>Staff provided technical edits and comments in the redline copy of the application to improve the clarity of this section. Staff recommends the application filed in eDockets include complete footnotes for the sources of information on which the assessment is based.</p> <p>Staff also recommends the application filed in eDockets discuss mitigation measures required by the Commission’s sample permit as well as mitigation measures permittees will implement above and beyond the sample permit’s requirements.</p>			<p>Applicants have reviewed all redline comments and have incorporated redlines as appropriate.</p> <p>Great River Energy revised this section and is no longer relying on the footnote referenced in EIP staff comments. Table 16 includes anticipated noise levels calculated by Great River Energy.</p> <p>Mitigation measures and sample route permit conditions are described in Section 6.4.6.2.</p>
<p><b>Aesthetics</b></p>	<p><b>2161.05, subd. 4(a)(2) 2161.19 (turbine lighting)</b></p>	<p><b>6.4.1</b></p>	
<p>Staff provided technical edits and comments in the redline copy of the application to improve the clarity of this section.</p> <p>Staff recommends the application filed in eDockets discuss mitigation measures required by the Commission’s sample permit as well as mitigation measures permittees will implement above and beyond the sample permit’s requirements.</p>			<p>Applicants have reviewed all redline comments and have incorporated redlines as appropriate.</p> <p>Mitigation measures and sample route permit conditions are described in Section 6.4.1.2.</p>
<p><b>Socioeconomic Impacts</b></p>	<p><b>2161.05, subd. 4(a)(2); 2161.05, subd. 11(b)(14)</b></p>	<p><b>6.4.9</b></p>	
<p>Staff provided technical edits and comments in the redline copy of the application to improve the clarity of this section</p> <p>Staff recommends the applicants make a separate section to discuss property values and provided links to a recent compilation of the research and literature concerning transmission line impacts to property values.</p> <p>Staff also recommends the application filed in eDockets discuss mitigation measures required by Commission permits as well as mitigation measures permittees will implement above and beyond permit requirements.</p>			<p>Applicants have reviewed all redline comments and have incorporated redlines as appropriate.</p> <p>Applicants have added a discussion of property values in Section 6.4.10, including references and links where appropriate.</p> <p>Mitigation measures and sample route permit conditions are described in Section 6.4.9.2.</p>

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<b>Environmental Justice Impacts</b>	216I.05, subd. 4(a)(2); 216I.05, subd. 11(a)(3)	6.4.4	
Meets staff expectations. None of the census tracts within the project area are considered environmental justice communities under the definition provided in Minn. Stat. § 216B.1691, subd. 1(e).			N/A
<b>Cultural Values</b>	216I.05, bud. 4(a) (2)	6.4.2	
Staff provided technical edits and comments in the redline copy of the application to improve the clarity of this section Staff recommends the application filed in eDockets discuss mitigation measures required by the Commission’s sample permit as well as mitigation measures permittees will implement above and beyond the sample permit’s requirements.			Applicants have reviewed all redline comments and have incorporated redlines as appropriate.  Mitigation measures and sample route permit conditions are described in Section 6.4.2.2.
<b>Recreation</b>	216I..05, subd. 4(a)(2)	6.4.8	
Staff provided technical edits and comments in the redline copy of the application to improve the clarity of this section Staff recommends the application filed in eDockets identify whether the proposed route crosses any snowmobile trails.  Staff recommends the application filed in eDockets discuss mitigation measures required by the Commission’s sample permit as well as mitigation measures permittees will implement above and beyond the sample permit’s requirements.			Applicants have reviewed all redline comments and have incorporated redlines as appropriate.  The Project does not cross snowmobile trails; this statement has been added to Section 6.4.8.  Mitigation measures and sample route permit conditions are described in Section 6.4.8.2.
<b>Public Services</b>	216I..05, subd. 4(a)(2)	6.4.7	

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<p>Staff provided technical edits and comments in the redline copy of the application to improve the clarity of this section.</p> <p>Staff recommends the application filed in eDockets discuss mitigation measures required by the Commission’s sample permit as well as mitigation measures permittees will implement above and beyond the sample permit’s requirements.</p>			<p>Applicants have reviewed all redline comments and have incorporated redlines as appropriate.</p> <p>Mitigation measures and sample route permit conditions are described in Section 6.4.7.2.</p>
<b>Land Use</b>	<b>216I.05, subd. 11(a) (2)</b>	<b>6.4.5</b>	
<p>Staff provided technical edits and comments in the redline copy of the application to improve the clarity of this section Staff recommends relocating the brief section “Public and Designated Lands” to the land use section.</p> <p>Staff recommends the application filed in eDockets expand its discussion of mitigation measures that minimize land use conflicts.</p>			<p>Applicants have reviewed all redline comments and have incorporated redlines as appropriate.</p> <p>Public and designated lands are now addressed in Section 6.4.5.1.</p> <p>Mitigation measures and sample route permit conditions are described in Section 6.4.5.2.</p>
<b>Land-based economics, generally</b>	<b>216I.05, subd. 4(a)(3)</b>	<b>6.6</b>	
<p>See comments on specific resource sections in the redline copy of the application.</p>			<p>Applicants have reviewed all redline comments and have incorporated redlines as appropriate.</p>
<b>Agriculture</b>	<b>216I.05, subd. 4(3); 216I.05, subd. 11(b)(5) and (9); see also Minn. R. 7850.4400, subp. 4.</b>	<b>6.6.1</b>	
<p>Staff recommends applicants add additional discussion of the potential for induction between the Project and the irrigation systems and mitigation measures to avoid this potential impact.</p>			<p>Applicant has added discussion of induction near irrigation systems in Section 6.6.1.1.</p>
<b>Forestry</b>	<b>216I.05, subd. 4(3)</b>	<b>6.6.2</b>	

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<p>Staff provided technical edits and comments in the redline copy of the application to improve the clarity of this section            Staff recommends the application filed in eDockets clarify that, although the project may result in some tree clearing, the project will not impact commercial forestry.</p>			<p>Applicants have reviewed all redline comments and have incorporated redlines as appropriate.</p> <p>Language regarding avoidance of commercial forestry is in Section 6.6.2.</p>
<b>Mining</b>	<b>216I.05, subd. 4(a)(3)</b>	<b>6.6.3</b>	
Meets staff expectations, the project is not expected to impact mining operations.			N/A
<b>Tourism</b>	<b>216I.05, subd. 4(a)(3)</b>	<b>6.6.4</b>	
Meets staff expectations, the project is not expected to materially impact tourism in the project area.			N/A
<b>Archaeological &amp; historic resources</b>	<b>216I.05, subd. 4(4)</b>	<b>6.7</b>	
<p>Staff provided technical edits and comments in the redline copy of the application to improve the clarity of this section.            Staff recommends the application filed in eDockets discuss mitigation measures required by the Commission’s sample permit as well as mitigation measures permittees will implement above and beyond the sample permit’s requirements.</p>			<p>Applicants have reviewed all redline comments and have incorporated redlines as appropriate.</p> <p>Mitigation measures and sample route permit conditions are described in Section 6.7.2.</p>
<b>Natural environment impacts - generally</b>	<b>216I.05, subd. 4(5)</b>	<b>6.8</b>	
See resource-specific discussions.			N/A

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<b>Air quality</b>		<b>216I.05, subd. 4(a)(5)</b>	<b>6.8.1</b>	
<p>Staff provided technical edits and comments in the redline copy of the application to improve the clarity of this section and documentation.</p> <p>Staff recommends the application filed in eDockets discuss mitigation measures required by the Commission’s sample permit as well as mitigation measures permittees will implement above and beyond the sample permit’s requirements.</p>				<p>Applicants have reviewed all redline comments and have incorporated redlines as appropriate.</p> <p>Mitigation measures and sample route permit conditions are described in Section 6.8.1.2.</p>
<b>Geology and Groundwater</b>		<b>216I.05, subd. 4(a)(5); 216I.05, subd. 11(b)(1)</b>	<b>6.8.4, 6.8.8</b>	
<p>The discussion of geology and topography meets staff expectations; the project is not anticipated to impact subsurface geology or topography.</p>				N/A
<p>Staff provided technical edits and comments in the redline copy of the application to improve the clarity of the groundwater section. Staff recommends the water resource section (including groundwater) be reorganized by resource (e.g. groundwater resource description, impacts, and mitigation) rather than the organization in the draft application which separates the resource descriptions from the impacts and mitigation discussion.</p> <p>Staff recommends the application filed in eDockets discuss mitigation measures required by the Commission’s sample permit as well as mitigation measures permittees will implement above and beyond the sample permit’s requirements.</p>				<p>Applicants have reviewed all redline comments and have incorporated redlines as appropriate.</p> <p>The water resource section has been reorganized by surface water and groundwater resources so that each resource has its own impacts and mitigation section.</p> <p>Mitigation measures and sample route permit conditions are described in Section 6.8.9.2.</p>
<b>Soils</b>		<b>216I.05, subd. 11(b)(1) and subd. 11(b)(5)</b>	<b>6.8.6</b>	
<p>Staff provided technical edits and comments in the redline copy of the application to improve the clarity of this section.</p> <p>Staff recommends the application filed in eDockets discuss mitigation measures required by the Commission’s sample permit as well as mitigation measures permittees will implement above and beyond the sample permit’s requirements.</p>				<p>Applicants have reviewed all redline comments and have incorporated redlines as appropriate.</p> <p>Mitigation measures and sample route permit conditions are described in Section 6.8.6.2.</p>

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<b>Surface waters (including stormwater, floodplains, and wetlands)</b>	<b>216I.05, subd. 4(5); 216I.05, subd. 11(b)(1)</b>	<b>6.8.8</b>	
<p>Staff provided technical edits and comments in the redline copy of the application to improve the clarity of this section Staff recommends the water resource section (including groundwater) be reorganized by resource (e.g. surface waters resource description, impacts, and mitigation) rather than the organization in the draft application which separates the resource descriptions from the impacts and mitigation discussion.</p> <p>Staff recommends the application filed in eDockets discuss mitigation measures required by the Commission’s sample permit as well as mitigation measures permittees will implement above and beyond the sample permit’s requirements.</p>			<p>Applicants have reviewed all redline comments and have incorporated redlines as appropriate.</p> <p>The water resource section has been reorganized by surface water and groundwater resources so that each resource has its own impacts and mitigation section.</p> <p>Mitigation measures and sample route permit conditions are described in Section 6.8.8.2.</p>
<b>Vegetation</b>	<b>216I.05, subd. 4(5)</b>	<b>6.8.7</b>	
<p>Staff provided technical edits and comments in the redline copy of the application to improve the clarity of this section</p> <p>Staff recommends the application filed in eDockets discuss mitigation measures required by the Commission’s sample permit as well as mitigation measures permittees will implement above and beyond the sample permit’s requirements.</p>			<p>Applicants have reviewed all redline comments and have incorporated redlines as appropriate.</p> <p>Mitigation measures and sample route permit conditions are described in Section 6.8.7.2.</p>
<b>Wildlife</b>	<b>216I.05, subd. 4(5)</b>	<b>6.8.9</b>	
<p>Staff provided technical edits and comments in the redline copy of the application to improve the clarity of this section. Staff recommends that the final application include a brief discussion on the potential for habitat fragmentation.</p> <p>Staff recommends the application filed in eDockets discuss mitigation measures required by the Commission’s sample permit as well as mitigation measures permittees will implement above and beyond the sample permit’s requirements.</p>			<p>Applicants have reviewed all redline comments and have incorporated redlines as appropriate.</p> <p>Habitat fragmentation is discussed in Section 6.8.10.1.</p> <p>Mitigation measures and sample route permit conditions are described in Section 6.8.10.2.</p>

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Rare and unique resources	subd. 4(8)	6.8.5	
<p>Staff provided technical edits and comments to improve the clarity of this section.</p> <p>Staff recommends the application filed in eDockets discuss mitigation measures required by the Commission’s sample permit as well as mitigation measures permittees will implement above and beyond the sample permit’s requirements.</p>			<p>Applicants have reviewed all redline comments and have incorporated redlines as appropriate.</p> <p>Mitigation measures and sample route permit conditions are described in Section 6.8.5.2.</p>
Greenhouse gases	216I.05, subd. 4(6)	6.8.3	
<p>Staff provided technical edits and comments in the redline copy of the application to improve the clarity of this section</p> <p>Staff recommends the application filed in eDockets discuss mitigation measures required by the Commission’s sample permit as well as mitigation measures permittees will implement above and beyond the sample permit’s requirements.</p>			<p>Applicants have reviewed all redline comments and have incorporated redlines as appropriate.</p> <p>Mitigation measures and sample route permit conditions are described in Section 6.8.3.2.</p>
Climate change resilience	216I.05, subd. 4(7)	6.8.2	
<p>Staff provided technical edits and comments in the redline copy of the application to improve the clarity of this section</p> <p>Staff recommends the application filed in eDockets discuss mitigation measures required by the Commission’s sample permit as well as mitigation measures permittees will implement above and beyond the sample permit’s requirements. Staff also recommends the final application expand on the discussion of Great River Energy’s ongoing transmission resilience improvements in the mitigation discussion.</p>			<p>Applicants have reviewed all redline comments and have incorporated redlines as appropriate.</p> <p>Mitigation measures and sample route permit conditions are described in Section 6.8.3.2.</p> <p>Additional information on resiliency projects is presented in Section 6.8.2.2.</p>
Unavoidable Impacts	216I.05, subd. 4(9)	6.9	

**Great River Energy – Otto Tap 115 kV Transmission Line Project**  
 Response to Minnesota Public Utilities Commission Energy Infrastructure Permitting Staff’s  
 September 25, 2025 Comments (Table 1 - Application Completeness Requirements) on the August 5, 2025 Draft Application

Topic	Statutory Requirement	Location in Document	App. Response
<p>Staff provided technical edits and comments in the redline copy of the application to improve the clarity of this section                      Staff recommends the application filed in eDockets discuss mitigation measures required by the Commission’s sample permit as well as mitigation measures permittees will implement above and beyond the sample permit’s requirements.</p>			<p>Applicants have reviewed all redline comments and have incorporated redlines as appropriate.</p> <p>There are no mitigation measures and sample route permit conditions applicable to Unavoidable Impacts.</p>
<b>Irretrievable and Irreversible Impacts</b>	<b>216I.05, subd. 11(b)(11)</b>	<b>6.10</b>	
<p>Staff provided technical edits and comments in the redline copy of the application to improve the clarity of this section.</p> <p>Staff recommends the application filed in eDockets discuss mitigation measures required by the Commission’s sample permit as well as mitigation measures permittees will implement above and beyond the sample permit’s requirements.</p>			<p>Applicants have reviewed all redline comments and have incorporated redlines as appropriate.</p> <p>There are no mitigation measures and sample route permit conditions applicable to Irreversible and Irretrievable Impacts.</p>
<b>Cumulative Potential Effects</b>	<b>216I.05, subd. 11(a)(2) and (b)(2)</b>	<b>n/a</b>	
<p>The Commission is charged with evaluating the potential human and environmental impacts of sites and routes including impacts related to possible future development or expansion in the project area. Staff interprets this charge to be an evaluation of cumulative potential effects associated with the Project. The draft application does not include a discussion of cumulative potential effects                      EIP staff recommends the application filed in eDockets discuss reasonably foreseeable projects in the vicinity of the Project and the potential interactions between the Project and other reasonably foreseeable projects with respect to human and environmental impacts.</p>			<p>The Applicants have added Section 6.11, Cumulative Impacts, to the application.</p>
<b>Mitigation Measures</b>	<b>216I.05, subd. 4(10)</b>	<b>Section 6</b>	
<p>Staff provided comments on mitigation in each resource sections in the redline copy of the application. In general, staff recommends that the application filed in eDockets discuss mitigation measures typically required by Commission permits as well as mitigation measures permittees will implement above and beyond permit requirements.</p>			<p>Applicants have reviewed all redline comments and have incorporated redlines as appropriate.</p> <p>Mitigation measures were added throughout the various resource sections.</p>