

**APPENDIX F**  
**Minnesota Public Utilities Commission**  
**Comments on the Draft Application**

November 26, 2025

Brie Anderson  
Senior Director of Project Permitting  
Apex Clean Energy Holdings, LLC  
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RE: Draft Application Review  
Big Bend Wind – GRE Transmission Line Extension Project  
Docket No. IP7013/TL-25-389

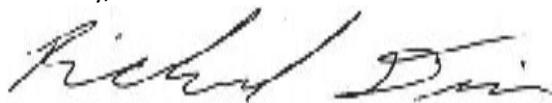
Dear Ms. Anderson

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 October 13, 2025, Big Bend Wind, LLC, on behalf of itself and co-applicant Great River Energy (GRE) (collectively, Applicants) provided Commission Energy Infrastructure Permitting (EIP) staff with a draft of the route permit application for the Big Bend Wind – GRE Transmission Line Extension Project, a 4.5 mile 161 kV transmission line, a new Big Bend step-up substation, and a new GRE interconnection substation in Martin County.

Attached are EIP staff comments on the draft application and a copy of the HVTL sample permit. 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,



Richard Davis  
Environmental Review Manager

## Draft Application Review

**Project:** Big Bend Wind – GRE Transmission Line Extension Project

**Docket:** IP7013/TL-25-389

**Date:** November 26, 2025

Big Bend Wind, LLC, on behalf of itself and co-applicant Great River Energy (GRE) (collectively, Applicants) provided a draft route permit application for the Big Bend Wind – GRE Transmission Line Extension Project (Project) on October 13, 2025. The project consists of an approximately 4.5 mile 161 kV transmission line, a new Big Bend step-up substation, and a new GRE interconnection substation in Martin County.

The 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 the final application filed in eDockets incorporate several revisions to clarify the proposed project, 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 summarized 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.
- Clarify specific mitigation measures that the applicants will commit to employing, avoid simply stating an impact will be mitigated and not identifying the mitigation action(s).
- Where appropriate, include a discussion of the Project’s design elements and configuration (e.g., following road rights-of-way or use of single poles rather than a horizontal configuration) that mitigate potential impacts.

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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>

<b>Topic</b>	<b>Statutory Requirement</b>	<b>Location in Document</b>
<b>Project ownership</b>	<b>216I.05, subd. 3(b)(1)</b>	<b>Section 1.4</b>
Meets EIP staff expectations. Big Bend will own and operate the 161 kV transmission line and the new 161/345 kV step-up substation. Great River Energy will own the 345 kV interconnection substation and the 345 kV conductor between the step-up and interconnection substations.		
<b>Permittee name</b>	<b>216I.05, subd. 3(b)(2)</b>	<b>Section 1.4 and</b>
Meets staff expectations. Big Bend and Great River Energy will each receive a permit, and the route permit will identify the components each permittee is responsible for.		
<b>Project description</b>	<b>216I.05, subd. 3(b)(3)</b>	<b>Sections 1 and 3</b>
EIP staff provided some comments for clarity in the redline. EIP staff recommends the following modifications to clarify the Project: <ul style="list-style-type: none"> <li>• Provide discussion as to why this project isn't be handled as an amendment to the existing Big Bend Wind transmission line route permit.</li> <li>• Provide clarification on the interconnection substation.</li> <li>• Edit proposed project figure (map) and provide another figure/map to show the currently permitted wind and transmission facilities and the proposed extension.</li> </ul>		
<b>Environmental Information, generally</b>	<b>216I.05, subd. 3(b)(4) and subd. 4(a)</b>	<b>Section 5</b>
See discussion in specific resource areas in the redline copy of the application. Generally, make sure that discussion of potential impacts and possible mitigation for each resource area captures the transmission line and the substations. Some resource area discussions don't specifically identify the substations, so it isn't clear if they are included in the general discussion with the transmission line or if they are not included. 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.		
<b>Identification of Property Owners</b>	<b>216I.05, subd. 3(b)(5), as described in 216I.05, subd. 8 (3)</b>	<b>Appendix I</b>
Meets staff expectations.		
<b>Maps</b>	<b>216I.05, subd. 3(b)(6)</b>	<b>Throughout Text and Appendix B</b>
Generally, meets staff expectations, reference Project description section above.		
<b>Existing ROWs</b>	<b>216I.05, subd. 3(b)(7)</b>	<b>3.1.1, 3.1.2, 3.1.3, and Appendix B</b>
Meets staff expectations.		
<b>Project design, including required ancillary facilities</b>	<b>216I.05, subd. 3(b)(8)</b>	<b>3.1, 3.2.1, and 3.3.1</b>

Topic	Statutory Requirement	Location in Document
Meets staff expectations.		
<b>Project cost</b>	<b>216I.05, subd. 3(b)(9)</b>	<b>3.8</b>
Meets staff expectations.		
<b>Design for expansion</b>	<b>216I.05, subd. 3(b)(10)</b>	<b>3.7</b>
Meets staff expectations.		
<b>Site or ROW acquisition, construction, maintenance, &amp; restoration</b>	<b>216I.05, subd. 3(b)(11)</b>	<b>3.2, 3.2.1, 3.2.2, 3.2.3, 3.2.4, 3.2.5, 3.2.6, 3.2.7, 3.3, 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.5</b>
Meets staff expectation.		
<b>Other Permits</b>	<b>216I.05, subd. 3(b)(12)</b>	<b>2.3</b>
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>4.1</b>
Meets staff expectation.		
<b>Additional information required by rule</b>	<b>216I.05, subd. 3(b)(15)</b>	<b>n/a</b>
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>Section 1.5 and Appendix D</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>		

Topic	Statutory Requirement	Location in Document
<p>As discussed in the Commission’s Tribal guidance, a single email or postal letter about a project does not suffice as coordination. A reasonable effort must be documented that the applicants attempted 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 E</b>
<p>Local Governmental Units were properly notified on September 10, 2025, via email as denoted in Appendix E.</p>		
<b>Preapplication Coordination (State Technical Resource Agencies)</b>	<b>216I.05, subd. 5 (3)</b>	<b>Appendix E</b>
<p>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. There appear to be a number of agencies that did not respond to outreach, this should be updated prior to filing the application in eDockets.</p>		
<b>Environmental setting</b>	<b>216I.05, subd. 4(a)(1)</b>	<b>5.3</b>
<p>Meets staff expectations.</p>		
<b>Human settlement, generally</b>	<b>216I.05, subd. 4(2)</b>	<b>5.4</b>
<p>See comments on specific resource section.</p>		
<b>Public health &amp; safety including EMF</b>	<b>216I.05, subd. 11(b)(1) (Decision Criteria)</b>	<b>5.5, 5.5.1, and 5.5.4</b>
<p>See comments on specific resource section.</p>		
<b>Displacement</b>	<b>216I.05, subd. 4(a)(2)</b>	<b>5.4.3</b>
<p>See comments on specific resource section.</p>		
<b>Noise</b>	<b>216I.05, subd. 4(a)(2)</b>	<b>5.4.7</b>
<p>See comments on specific resource section.</p>		
<b>Aesthetics</b>	<b>216I.05, subd. 4(a)(2) 216I.19 (turbine lighting)</b>	<b>5.4.1</b>
<p>See comments on specific resource section.</p>		

<b>Topic</b>	<b>Statutory Requirement</b>	<b>Location in Document</b>
<b>Socioeconomic Impacts</b>	<b>216I.05, subd. 4(a)(2); 216I.05, subd. 11(b)(14)</b>	<b>5.4.10</b>
See comments on specific resource section.		
<b>Environmental Justice Impacts</b>	<b>216I.05, subd. 4(a)(2); 216I.05, subd. 11(a)(3)</b>	<b>5.4.5</b>
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).		
<b>Cultural Values</b>	<b>216I.05, bud. 4(a) (2)</b>	<b>5.4.2</b>
See comments on specific resource section.		
<b>Recreation</b>	<b>216I..05, subd. 4(a)(2)</b>	<b>5.4.9</b>
See comments on specific resource section.		
<b>Public Services</b>	<b>216I..05, subd. 4(a)(2)</b>	<b>5.4.8, 5.5.2, and 5.5.3</b>
See comments on specific resource section.		
<b>Land Use</b>	<b>216I.05, subd. 11(a) (2)</b>	<b>5.4.6</b>
See comments on specific resource section.		
<b>Land-based economics, generally</b>	<b>216I.05, subd. 4(a)(3)</b>	<b>5.6</b>
See comments on specific resource section.		
<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>5.6.1</b>
See comments on specific resource section.		
<b>Forestry</b>	<b>216I.05, subd. 4(3)</b>	<b>5.6.2</b>
Meets staff expectations, the project is not expected to impact forestry.		
<b>Mining</b>	<b>216I.05, subd. 4(a)(3)</b>	<b>5.6.3</b>

<b>Topic</b>	<b>Statutory Requirement</b>	<b>Location in Document</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>5.6.4</b>
See comments on specific resource section.		
<b>Archaeological &amp; historic resources</b>	<b>216I.05, subd. 4(4)</b>	<b>5.7</b>
See comments on specific resource section.		
<b>Natural environment impacts - generally</b>	<b>216I.05, subd. 4(5)</b>	<b>5.8</b>
Meets staff expectations.		
<b>Air quality</b>	<b>216I.05, subd. 4(a)(5)</b>	<b>5.8.1</b>
See comments on specific resource section.		
<b>Geology and Groundwater</b>	<b>216I.05, subd. 4(a)(5); 216I.05, subd. 11(b)(1)</b>	<b>5.8.4, 5.8.9</b>
See comments on specific resource section.		
<b>Soils</b>	<b>216I.05, subd. 11(b)(1) and subd. 11(b)(5)</b>	<b>5.8.7</b>
See comments on specific resource section.		
<b>Surface waters (including stormwater, floodplains, and wetlands)</b>	<b>216I.05, subd. 4(5); 216I.05, subd. 11(b)(1)</b>	<b>5.8.9</b>
See comments on specific resource section.		
<b>Vegetation</b>	<b>216I.05, subd. 4(5)</b>	<b>5.8.8</b>
See comments on specific resource section.		
<b>Wildlife</b>	<b>216I.05, subd. 4(5)</b>	<b>5.8.10</b>
See comments on specific resource section.		

<b>Topic</b>	<b>Statutory Requirement</b>	<b>Location in Document</b>
<b>Rare &amp; unique resources</b>	<b>subd. 4(8)</b>	<b>5.8.6</b>
See comments on specific resource section.		
<b>Greenhouse gases</b>	<b>216I.05, subd. 4(6)</b>	<b>5.8.3</b>
See comments on specific resource section.		
<b>Climate change resilience</b>	<b>216I.05, subd. 4(7)</b>	<b>5.8.2</b>
See comments on specific resource section.		
<b>Unavoidable Impacts</b>	<b>216I.05, subd. 4(9)</b>	<b>5.9</b>
See comments on specific resource section.		
<b>Irretrievable and Irreversible Impacts</b>	<b>216I.05, subd. 11(b)(11)</b>	<b>5.10</b>
Meets staff expectations.		
<b>Cumulative Potential Effects</b>	<b>216I.05, subd. 11(a)(2) and (b)(2)</b>	<b>5.11</b>
See comments on specific resource section.		
<b>Mitigation Measures</b>	<b>216I.05, subd. 4(10)</b>	<b>Throughout Section 5</b>
See comments provided by staff on specific resource sections.		

**Big Bend and Great River Energy Extension Line Project**  
 Response to Minnesota Public Utilities Commission  
 Energy Infrastructure Permitting Draft Application Comments

<b>Topic</b>	<b>Statutory Requirement</b>	<b>Location in Document</b>	<b>Response</b>
<b>Project ownership</b>	<b>216I.05, subd. 3(b)(1)</b>	<b>Section 1.4</b>	
Meets EIP staff expectations. Big Bend will own and operate the 161 kV transmission line and the new 161/345 kV step-up substation. Great River Energy will own the 345 kV interconnection substation and the 345 kV conductor between the step-up and interconnection substations.			N/A
<b>Permittee name</b>	<b>216I.05, subd. 3(b)(2)</b>	<b>Section 1.4 and (sic)</b>	
Meets staff expectations. Big Bend and Great River Energy will each receive a permit, and the route permit will identify the components each permittee is responsible for.			N/A
<b>Project description</b>	<b>216I.05, subd. 3(b)(3)</b>	<b>Sections 1 and 3</b>	
EIP staff provided some comments for clarity in the redline. EIP staff recommends the following modifications to clarify the Project: <ul style="list-style-type: none"> <li>• Provide discussion as to why this project isn't be handled as an amendment to the existing Big Bend Wind transmission line route permit.</li> <li>• Provide clarification on the interconnection substation.</li> <li>• Edit proposed project figure (map) and provide another figure/map to show the currently permitted wind and transmission facilities and the proposed extension.</li> </ul>			Applicants have incorporated comments as appropriate. <ul style="list-style-type: none"> <li>• Permit amendment discussed.</li> <li>• Clarification about Interconnection Substation provided.</li> <li>• Map showing Extension Project and wind farm provided.</li> </ul>
<b>Environmental Information, generally</b>	<b>216I.05, subd. 3(b)(4) and subd. 4(a)</b>	<b>Section 5</b>	
See discussion in specific resource areas in the redline copy of the application. Generally, make sure that discussion of potential impacts and possible mitigation for each resource area captures the transmission line and the substations. Some resource area discussions don't specifically identify the substations, so it isn't clear if they are included in the general discussion with the transmission line or if they are not included. 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.			Applicants have added discussion concerning transmission line/substation impacts and mitigation as appropriate.  Applicants have provided a reference chapter.
<b>Identification of Property Owners</b>	<b>216I.05, subd. 3(b)(5), as described in 216I.05, subd. 8 (3)</b>	<b>Appendix I</b>	
Meets staff expectations.			N/A
<b>Maps</b>	<b>216I.05, subd. 3(b)(6)</b>	<b>Throughout Text and Appendix B</b>	
Generally, meets staff expectations, reference Project description section above.			Addressed. See above.

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<b>Topic</b>	<b>Statutory Requirement</b>	<b>Location in Document</b>	<b>Response</b>
<b>Existing ROWs</b>	<b>216I.05, subd. 3(b)(7)</b>	<b>3.1.1, 3.1.2, 3.1.3, and Appendix B</b>	
Meets staff expectations.			N/A
<b>Project design, including required ancillary facilities</b>	<b>216I.05, subd. 3(b)(8)</b>	<b>3.1, 3.2.1, and 3.3.1</b>	
Meets staff expectations.			N/A
<b>Project cost</b>	<b>216I.05, subd. 3(b)(9)</b>	<b>3.8</b>	
Meets staff expectations.			N/A
<b>Design for expansion</b>	<b>216I.05, subd. 3(b)(10)</b>	<b>3.7</b>	
Meets staff expectations.			N/A
<b>Site or ROW acquisition, construction, maintenance, &amp; restoration</b>	<b>216I.05, subd. 3(b)(11)</b>	<b>3.2, 3.2.1, 3.2.2, 3.2.3, 3.2.4, 3.2.5, 3.2.6, 3.2.7, 3.3, 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.5</b>	
Meets staff expectation.			N/A
<b>Other Permits</b>	<b>216I.05, subd. 3(b)(12)</b>	<b>2.3</b>	
Meets staff expectations.			N/A
<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.			N/A
<b>Other sites or routes considered</b>	<b>216I.05, subd. 3(b)(14)</b>	<b>4.1</b>	
Meets staff expectation.			N/A
<b>Additional information required by rule</b>	<b>216I.05, subd. 3(b)(15)</b>	<b>n/a</b>	
Staff recommends the applicants clarify whether the project avoids the prohibited routes identified in Minn. R. 7850.4300.			Discussion of these resources already occurred in Section 5.8.5. A specific citation to Minn. R. 7850.4300 has been added.

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Topic	Statutory Requirement	Location in Document	Response
<b>Tribal coordination</b>	<b>216I.05, subd. 3(b)(16)</b>	<b>Section 1.5 and Appendix D</b>	
<p>The Commission's July 2025 Guidance for Successful Tribal Engagement (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. A reasonable effort must be documented that the applicants attempted 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>			<p>Applicants have added additional details about coordination with Tribes, including additional outreach activities.</p>
<b>Preapplication Coordination (LGUs)</b>	<b>216I.05, subd. 5 (1)</b>	<b>Appendix E</b>	
<p>Local Governmental Units were properly notified on September 10, 2025, via email as denoted in Appendix E.</p>			<p>N/A</p>

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<b>Topic</b>	<b>Statutory Requirement</b>	<b>Location in Document</b>	<b>Response</b>
<b>Preapplication Coordination (State Technical Resource Agencies)</b>	<b>216I.05, subd. 5 (3)</b>	<b>Appendix E</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. There appear to be a number of agencies that did not respond to outreach, this should be updated prior to filing the application in eDockets.			Applicants have reviewed the Agency Reps service list. The state agencies on this list have been contacted.  Applicants have updated the Application to indicate a no response from technical resource agencies as appropriate.
<b>Environmental setting</b>	<b>216I.05, subd. 4(a)(1)</b>	<b>5.3</b>	
Meets staff expectations.			N/A
<b>Human settlement, generally</b>	<b>216I.05, subd. 4(2)</b>	<b>5.4</b>	
See comments on specific resource section.			Applicants have reviewed all redlines 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>5.5, 5.5.1, and 5.5.4</b>	
See comments on specific resource section.			Applicants have reviewed all redlines and have incorporated redlines as appropriate.
<b>Displacement</b>	<b>216I.05, subd. 4(a)(2)</b>	<b>5.4.3</b>	
See comments on specific resource section.			Applicants have reviewed all redlines and have incorporated redlines as appropriate.
<b>Noise</b>	<b>216I.05, subd. 4(a)(2)</b>	<b>5.4.7</b>	
See comments on specific resource section.			Applicants have reviewed all redlines and have incorporated redlines as appropriate.

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<b>Topic</b>	<b>Statutory Requirement</b>	<b>Location in Document</b>	<b>Response</b>
<b>Aesthetics</b>	<b>216I.05, subd. 4(a)(2) 216I.19 (turbine lighting)</b>	<b>5.4.1</b>	
See comments on specific resource section.			Applicants have reviewed all redlines and have incorporated redlines as appropriate.
<b>Socioeconomic Impacts</b>	<b>216I.05, subd. 4(a)(2); 216I.05, subd. 11(b)(14)</b>	<b>5.4.10</b>	
See comments on specific resource section.			Applicants have reviewed all redlines and have incorporated redlines as appropriate.
<b>Environmental Justice Impacts</b>	<b>216I.05, subd. 4(a)(2); 216I.05, subd. 11(a)(3)</b>	<b>5.4.5</b>	
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>	<b>216I.05, bud. 4(a) (2)</b>	<b>5.4.2</b>	
See comments on specific resource section.			Applicants have reviewed all redlines and have incorporated redlines as appropriate.
<b>Recreation</b>	<b>216I..05, subd. 4(a)(2)</b>	<b>5.4.9</b>	
See comments on specific resource section.			Applicants have reviewed all redlines and have incorporated redlines as appropriate.
<b>Public Services</b>	<b>216I..05, subd. 4(a)(2)</b>	<b>5.4.8, 5.5.2, and 5.5.3</b>	
See comments on specific resource section.			Applicants have reviewed all redlines and have incorporated redlines as appropriate.
<b>Land Use</b>	<b>216I.05, subd. 11(a) (2)</b>	<b>5.4.6</b>	
See comments on specific resource section.			Applicants have reviewed all redlines and have incorporated redlines as appropriate.
<b>Land-based economics, generally</b>	<b>216I.05, subd. 4(a)(3)</b>	<b>5.6</b>	
See comments on specific resource section.			Applicants have reviewed all redlines and have incorporated redlines as appropriate.

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 Energy Infrastructure Permitting Draft Application Comments

<b>Topic</b>	<b>Statutory Requirement</b>	<b>Location in Document</b>	<b>Response</b>
<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>5.6.1</b>	
See comments on specific resource section.			Applicants have reviewed all redlines and have incorporated redlines as appropriate.
<b>Forestry</b>	<b>216I.05, subd. 4(3)</b>	<b>5.6.2</b>	
Meets staff expectations, the project is not expected to impact forestry.			N/A
<b>Mining</b>	<b>216I.05, subd. 4(a)(3)</b>	<b>5.6.3</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>5.6.4</b>	
See comments on specific resource section.			Applicants have reviewed all redlines and have incorporated redlines as appropriate.
<b>Archaeological &amp; historic resources</b>	<b>216I.05, subd. 4(4)</b>	<b>5.7</b>	
See comments on specific resource section.			Applicants have reviewed all redlines and have incorporated redlines as appropriate.
<b>Natural environment impacts - generally</b>	<b>216I.05, subd. 4(5)</b>	<b>5.8</b>	
Meets staff expectations.			N/A
<b>Air quality</b>	<b>216I.05, subd. 4(a)(5)</b>	<b>5.8.1</b>	
See comments on specific resource section.			Applicants have reviewed all redlines and have incorporated redlines as appropriate.
<b>Geology and Groundwater</b>	<b>216I.05, subd. 4(a)(5); 216I.05, subd. 11(b)(1)</b>	<b>5.8.4, 5.8.9</b>	
See comments on specific resource section.			Applicants have reviewed all redlines and have incorporated redlines as appropriate.

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<b>Soils</b>	<b>216I.05, subd. 11(b)(1) and subd. 11(b)(5)</b>	<b>5.8.7</b>	
See comments on specific resource section.			Applicants have reviewed all redlines and have incorporated redlines as appropriate.
<b>Surface waters (including stormwater, floodplains, and wetlands)</b>	<b>216I.05, subd. 4(5); 216I.05, subd. 11(b)(1)</b>	<b>5.8.9</b>	
See comments on specific resource section.			Applicants have reviewed all redlines and have incorporated redlines as appropriate.
<b>Vegetation</b>	<b>216I.05, subd. 4(5)</b>	<b>5.8.8</b>	
See comments on specific resource section.			Applicants have reviewed all redlines and have incorporated redlines as appropriate.
<b>Wildlife</b>	<b>216I.05, subd. 4(5)</b>	<b>5.8.10</b>	
See comments on specific resource section.			Applicants have reviewed all redlines and have incorporated redlines as appropriate.
<b>Rare &amp; unique resources</b>	<b>subd. 4(8)</b>	<b>5.8.6</b>	
See comments on specific resource section.			Applicants have reviewed all redlines and have incorporated redlines as appropriate.
<b>Greenhouse gases</b>	<b>216I.05, subd. 4(6)</b>	<b>5.8.3</b>	
See comments on specific resource section.			Applicants have reviewed all redlines and have incorporated redlines as appropriate.
<b>Climate change resilience</b>	<b>216I.05, subd. 4(7)</b>	<b>5.8.2</b>	
See comments on specific resource section.			Applicants have reviewed all redlines and have incorporated redlines as appropriate.

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<b>Topic</b>	<b>Statutory Requirement</b>	<b>Location in Document</b>	<b>Response</b>
<b>Unavoidable Impacts</b>	<b>216I.05, subd. 4(9)</b>	<b>5.9</b>	
See comments on specific resource section.			Applicants have reviewed all redlines and have incorporated redlines as appropriate.
<b>Irretrievable and Irreversible Impacts</b>	<b>216I.05, subd. 11(b)(11)</b>	<b>5.10</b>	
Meets staff expectations.			N/A
<b>Cumulative Potential Effects</b>	<b>216I.05, subd. 11(a)(2) and (b)(2)</b>	<b>5.11</b>	
See comments on specific resource section.			Applicants have reviewed all redlines and have incorporated redlines as appropriate.
<b>Mitigation Measures</b>	<b>216I.05, subd. 4(10)</b>	<b>Throughout Section 5</b>	
See comments provided by staff on specific resource sections.			Applicants have reviewed all redlines and have incorporated redlines as appropriate.