

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE APPLICATION OF
MINNESOTA POWER AND GREAT RIVER
ENERGY FOR A CERTIFICATE OF NEED AND
ROUTE PERMIT FOR THE NORTHLAND
RELIABILITY PROJECT 345-kV
TRANSMISSION LINE

MPUC Docket Nos. E015,ET2/TL-22-415
E015,ET2/CN-22-416
OAH Docket No. 21-2500-39822

**MINNESOTA POWER AND GREAT RIVER ENERGY'S
EXCEPTIONS TO THE FINDINGS OF FACT,
CONCLUSIONS OF LAW,
AND RECOMMENDATIONS OF
THE ADMINISTRATIVE LAW JUDGE**

November 25, 2024

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I. INTRODUCTION

Minnesota Power and Great River Energy (the “Applicants”) respectfully submit the following exceptions and clarifications to the Administrative Law Judge’s (“ALJ”) Findings of Fact, Conclusions of Law, and Recommendations (“ALJ Report”) for the Northland Reliability Project (“Project”). The Applicants appreciate the comprehensive and thorough analysis of the record evidence and the applicable statutory and rule criteria contained in the ALJ Report. The Applicants also agree with and appreciate the ALJ’s recommendation that the Minnesota Public Utilities Commission (“Commission”) grant a route permit for the Project.

The Applicants take exception to the ALJ’s recommendation that several modifications be incorporated into the Co-location Maximization Route, including inferior alternatives A3, E4 or E5, H1, and J2.¹ The Applicants took, very seriously, the Commission’s clear direction to fully evaluate how the Project could maximize co-location with existing facilities and developed the Co-location Maximization Route. The record demonstrates that the Co-location Maximization Route meets the state routing criteria and maximizes co-location with existing facilities, as the Commission requested. If the Commission seeks to follow the state routing criteria and prioritize maximizing co-location with existing facilities, the Applicants request that the Commission select the Co-location Maximization Route (as proposed by the Applicants and without further modification). However, if the Commission seeks to follow the state routing criteria and approve a lower cost route without prioritizing maximizing co-location with existing facilities, the Applicants

¹ To the extent the Commission selects the Modified Proposed Route, the Applicants likewise object to alternatives A3, H1, and J2 being incorporated into that route, for the reasons discussed in this filing.

request that the Commission select the Modified Proposed Route (as proposed by the Applicants and without further modification).

The Applicants' detailed exceptions and clarifications regarding the routing analysis and the ALJ's overall recommendation for the Project route are provided below. The Applicants also take exception to the ALJ Report because it does not include standard permit conditions and special permit conditions supported by the Applicants and the record in this proceeding. Finally, Applicants propose clarifications to the Report.

Pursuant to Minn. R. 7829.2700, subp. 3, and Minn. Stat. § 14.61, the Applicants respectfully request the opportunity to present oral argument ahead of the Commission's deliberations and decision.

II. EXCEPTIONS AND CLARIFICATIONS TO ALJ REPORT

A. Exceptions

The Applicants developed two route options based on a careful evaluation of the record, including public comments. The Modified Proposed Route is the original route proposed by the Applicants in the Combined Application with the following modifications: modified alignment alternative AA1, the Swatara Route Width Expansion, the Moose River Alignment Alternative, alignment alternative AA9, alignment alternative AA10, modified route alternative H4/H7,² and modified alignment alternative AA17.³ The Applicants' proposed Co-location Maximization Route includes the Modified Proposed Route and is further modified by alignment alternative AA16 (near Split Hand Lake), route

² Please note that this developed alternative includes portions of the original route alternative H4 and route alternative H7 and was referred to in Applicants' September 19, 2024 Response to Public Hearing Comments as "modified route alternative H4 and H7." To clarify the record, this will be referred to as "modified route alternative H4/H7" in these Exceptions and Clarifications.

³ Applicants' September 19, 2024 Response to Public Hearing Comments at Attachment A (September 19, 2024) (eDocket No. [20249-210355-04](#)).

alternative E1 (Riverton Area Alternative Corridor), alignment alternative AA3 (Cole Lake Way Alignment Alternative), and the Elk River Alignment Alternative to allow for additional opportunities to co-locate the Project with existing transmission lines.⁴

In the ALJ Report, the ALJ concluded that the Applicants' proposed Co-location Maximization Route meets the routing criteria,⁵ but should be modified. The ALJ recommended incorporating route alternative A3 in the Iron Range Substation Region, route alternative E4 or route alternative E5 in the Cole Lake to Riverton Region, route alternative H1 in the Long Lake Region, and route alternative J2 in the Benton County Elk River Region. While the Applicants agree with the ALJ that the record demonstrates that the Co-location Maximization Route, developed in response to the Commission's directive to examine opportunities for transmission line infrastructure stacking along with support from Project stakeholders, satisfies the state routing criteria and is constructible, the record does not support that route alternatives A3, E4, E5, H1, or J2 should be incorporated into the final route for the Project.

1. *Project Route Options by Region*

a. **Iron Range Substation Region — ALJ Report Recommended Route Alternative A3**

The ALJ Report determined that “[r]oute alternative A3 strikes the most reasonable balance between the various competing policy objectives and concerns of stakeholders.”⁶ and “minimizes impacts to sensitive natural resources and habitat.”⁷

⁴ Applicants' September 19, 2024 Response to Public Hearing Comments at Attachment B September 19, 2024) (eDocket No. [20249-210359-01](#)).

⁵ See Section II.A for a discussion on exceptions to the ALJ's ranking of the Modified Proposed Route and the Co-location Maximization Route.

⁶ ALJ Report at Finding 97 (Nov. 8, 2024) (eDocket No. [202411-211770-02](#)).

⁷ ALJ Report at Finding 718 (Nov. 8, 2024) (eDocket No. [202411-211770-02](#)).

However, the factual findings in the ALJ Report and the broader record do not support this conclusion.

Both the Co-location Maximization Route and route alternative A3 require a crossing of the Swan River, have the same number of sites of biodiversity within the right-of-way, have nearly the same total wetlands and forested wetlands within the right-of-way, and nearly the same number of acres of agricultural land within the right-of-way.⁸ Further, finding 717 states the following: “In the Iron Range Substation Region, the . . . Co-location Maximization Route is most consistent with the Commission’s routing criteria.” Finding 703 identifies that route alternative A3 would require two transmission line crossings, introducing an increased reliability risk, instead of the zero transmission line crossings necessary for the Co-location Maximization Route.⁹ Route alternative A3 is also in closer proximity to more residences than the Co-location Maximization Route.¹⁰ Finally, as identified in the EA, route alternative A3 would place a residence between two high-voltage transmission lines, and within 200 feet of each line.¹¹

Therefore, the Applicants propose the following modifications to the ALJ Report’s findings for the Iron Range Substation Region:

Finding 97. Route alternative A3 is 1.4 miles long and diverges from the Applicants’ Proposed Route just west of County Road 10. From that point, route alternative A3 continues west for 0.5 mile, then turns southwest

⁸ Ex. EERA-9 at Table 6-6 (EA) (eDocket No. [20246-208129-10](#)).

⁹ ALJ Report at Finding 703 (Nov. 8, 2024) (eDocket No. [202411-211770-02](#)).

¹⁰ ALJ Report at Finding 512 (Nov. 8, 2024) (eDocket No. [202411-211770-02](#)). There are no residences within 0-250 feet, 2 residences within 250-500 feet, and 4 residences within 500-1,000 feet of the Co-location Maximization Route. There are no residences within 0-75 feet, 1 residence within 75-250 feet, 2 residences within 250-500 feet, and 7 residences within 500-1,000 feet of route alternative A. Therefore, there are 6 residences within 1,000 feet of the Co-location Maximization Route and 10 residences within 1,000 feet of the Co-location Maximization Route. Ex. EERA-9 at Table 6-6 (eDocket No. [20246-208129-10](#)).

¹¹ Ex. EERA-9 at Table 7-1 (EA) (eDocket No. [20246-208129-14](#)).

after crossing County Road 434, where it continues for approximately 0.85 mile, crossing the Swan River at a previously disturbed bridge location. Route alternative A3 would cross an existing transmission line in two locations (once to cross over the existing transmission line and once to cross back). It does not include any transmission line right-of-way sharing, paralleling, or double-circuiting.^[1] Route alternative A3 ~~would not greatly increase~~ impacts to residences, ~~although it follows less existing high-voltage transmission lines,~~ and increases the number of crossings of the existing 230 kV 92 Line.^[1] ~~Route alternative A3 strikes the most reasonable balance between the various competing policy objectives and concerns of stakeholders.~~

Finding 98. Route alternative A4 is 3.7 miles long and diverts from the Applicants' Proposed Route near County Road 10, where it turns south for approximately 1.75 miles and then turns west for approximately two miles.^[1] Route alternative A4 does not follow any existing high-voltage transmission lines and has the potential for greater impacts to residences.^[1] ~~Route alternative A4~~ ~~it nevertheless minimizes environmental impacts and~~ has fewer ~~of the~~ crossings of existing transmission lines than other route alternatives in this area ~~Applicants prefer to avoid.~~^[1]

Finding 717. In the Iron Range Substation Region,^[1] the Applicants' Modified Proposed Route, which in this region is the same as the Co-Location Maximization Route, is ~~most~~ consistent with the Commission's routing criteria. In the EA, EERA compared the Applicants' Proposed Route with alternative routes A1 through A4.^[1]

Finding 718. EERA included A2 in Example Full Route Options 2, 4, and 5 because A2 maximizes the use of existing transmission lines and rights-of-way. In Example Full Route Options 1 and 3, EERA included the Applicants' Proposed Route as it avoids potential impacts to cultural resources and offers a balance to potential natural resource and agricultural land use impacts.^[1] Route alternative A3, as noted above, ~~minimizes~~ minimally reduces impacts to certain sensitive natural resources and habitat, while placing the Project in closer proximity to residences and requiring additional crossings of existing transmission lines.¹²

¹² Ex. EERA-9 at Table 6-6 (EA) (eDocket No. [20246-208129-10](#)).

b. Hill City to Little Pine Region

The following modification to the ALJ Report is proposed to clarify that both the Modified Proposed Route and the Co-location Maximization Route are consistent with the Commission's routing criteria:

Finding 720. In the Hill City to Little Pine Region,^[1] the Applicants' Modified Proposed Route and Co-location Maximization Route ~~are is most~~ consistent with the Commission's routing criteria. EERA compared the Applicants' Proposed Route to route alternatives B and C, as well as ~~A~~alignment ~~A~~alternatives 1, 2, and 16.^[1]

c. Cole Lake to Riverton Region — ALJ Report Recommended Route Alternative E4 or E5

The ALJ Report concluded that route alternative E4 and route alternative E5 in the Cole Lake to Riverton Region satisfy the routing criteria and recommended that the Project be constructed on one of these route alternatives.¹³ The ALJ Report determined that route alternative E4 “impacts far fewer natural resources and residences, effecting the most reasonable balance between competing interests”¹⁴ and that route alternatives E4 and E5 “do not impact Little Rabbit Lake and various recreational and forest resources.”¹⁵

Finding that route alternative E4 and route alternative E5 should be selected is not supported by the record. First, the two routes are not constructible as proposed because both cross directly over the Riverton Substation.¹⁶ The modifications necessary to make

¹³ ALJ Report at Finding 730 and 738 (Nov. 8, 2024) (eDocket No. [202411-211770-02](#)).

¹⁴ ALJ Report at Finding 116 (Nov. 8, 2024) (eDocket No. [202411-211770-02](#)).

¹⁵ ALJ Report at Finding 725 (Nov. 8, 2024) (eDocket No. [202411-211770-02](#)).

¹⁶ EERA's September 5, 2024 Comments at Attachment A at Table 6-7 (Sep. 5, 2024) (eDocket No. [20249-210005-04](#)); Applicant's September 19, 2024 Comments at Attachment D at 4 (Sep. 19, 2024) (eDocket No. [20249-210359-05](#)).

route alternatives E4 and E5 feasible would likely result in residential displacement and the costly relocation of the Riverton Substation; the cost estimates of residential displacement and to relocate the Riverton Substation have not been developed. Further, even as proposed in the record, route alternatives E4 and E5 would each require *two crossings of the Mississippi River*, whereas neither the Co-location Maximization Route nor the Modified Proposed Route cross the Mississippi River.¹⁷ Additionally, route alternatives E4 and E5 have three homes within 0-75 feet (within the Project right-of-way) of the alignments and are likely to result in displacement, whereas the Modified Proposed Route and Co-location Maximization Route would have no displacement of residences.¹⁸ Finally, although the ALJ Report indicates that route alternative E4 and E5 have lower costs than the Co-location Maximization Route, the cost estimates in the Environmental Assessment (“EA”) for route alternatives E4 and E5 do not include the costs associated with the identified residential displacement or to relocate the Riverton Substation to accommodate these route alternatives, as these route alternatives are not constructable as proposed.¹⁹

The Applicants previously provided a detailed discussion of constraints in the Riverton Substation area which render the proposed alignments of route alternatives E4 and E5, within the evaluated route widths, infeasible through this area. Besides the existing Riverton Substation, this area is further constrained by substation access roads, buildings on private property, between four and five additional existing transmission line

¹⁷ ALJ Report at Finding 645 (Nov. 8, 2024) (eDocket No. [202411-211770-02](#)).

¹⁸ Ex. EERA-9 at Table 6-62; ALJ Report at Finding 515 (Nov. 8, 2024) (eDocket No. [202411-211770-02](#)).

¹⁹ EERA’s September 5, 2024 Comments at Attachment A at Table 6-7; Applicant’s September 19, 2024 Comments at Attachment D at 4 (Sep. 5, 2024) (eDocket No. [20249-210005-04](#)).

crossings, the Cuyuna Country State Recreation Area, the Mississippi River, and Minnesota Power's planned expansion of the Riverton Substation to construct a static synchronous compensator ("STATCOM") system to provide steady state and dynamic voltage support for the local and regional 230 kV network.²⁰

The ALJ Report acknowledges that the existing features around the substation prevent routing around the Riverton Substation within the routes evaluated in the EA.²¹ Route alternative E4 and route alternative E5 would also require additional crossings of up to six existing transmission lines in the area, resulting in potential impacts to transmission reliability. Additionally, both route alternative E4 and route alternative E5 would require establishing new rights-of-way, as only 89 and 83 percent of the route alternatives, respectively, follow existing rights-of-way, and, these route alternatives would not fully replace any existing line on existing right-of-way.

In contrast, the Co-location Maximization Route (route alternative E1) follows existing transmission line rights-of-way for 100 percent of its length and allows for construction of the Project largely on these existing rights-of-way by relocating and reconfiguring existing transmission lines to accommodate the Project, resulting in only minimal additional right-of-way width necessary for construction.²² While the Co-location Maximization Route does cross a portion of Little Rabbit Lake, it is where existing transmission lines already cross the lake and those lines will be consolidated and relocated with the Co-location Maximization Route to allow the Project to use the existing,

²⁰ Applicants' September 19, 2024 Response to Public Hearing Comments at Attachment E at 15-17 (Sep. 19, 2024) (eDocket No. [20249-210359-05](#)).

²¹ ALJ Report at Finding 116 (Nov. 8, 2024) (eDocket No. [202411-211770-02](#)).

²² EX. EERA-9 at Table 6-62 (EA) (eDocket No. [20246-208129-12](#)); ALJ Report at Findings 113, 116, and 117 (Nov. 8, 2024) (eDocket No. [202411-211770-02](#)).

and slightly expanded, right-of-way across the lake.²³ The existing 69 kV, 115 kV, and 230 kV transmission lines along the Co-location Maximization Route would remain crossing Little Rabbit Lake if route alternative E4 or route alternative E5 were selected for the Project. The record and the findings in the ALJ Report do not support the selection of route alternative E4 or route alternative E5 for the Project.

Therefore, the Applicants propose the following modifications to the ALJ's findings for the Cole Lake to Riverton Region:

Finding 116. Route alternative E4 is 11 miles long. Approximately 1 mile north of Miller Lake Road route alternative E4 heads southwest of the Applicants' Proposed Route and west of the town of Riverton, where it begins a route edging west around Hay Lake, with two Mississippi River crossings. Route alternative E4 then heads due south for approximately 4.5 miles. Route alternative E4 would share existing transmission line right-of-way for approximately 8 of its 11 miles. Route alternative E4 would cross six existing transmission lines and would require at least two additional heavy-angle structures to accommodate 90-degree and angled turns along the route.^[1] In addition to requiring two crossings of the Mississippi River, route alternative E4 would require placement of the Project near residences (including three residences within 0-75 feet, which may result in displacement). Further, the proposed alignment for route alternative E4 crosses directly over the existing Riverton Substation, rendering the proposed alignment infeasible. Existing features around the substation prevent routing around the substation within the route widths evaluated in the EA.^[1] The ~~Applicant contends that the~~ Modified Proposed Route and the Co-location Maximization Route provide feasible and comprehensive routing alternatives through this area.^[1] ~~Route alternative E4 impacts far fewer natural resources and residences, effecting the most reasonable balance between competing interests.~~

Finding 117. Route alternative E5 is 8.1 miles long and was proposed as a shorter alternative to route alternative E4. It would share existing transmission line right-of-way for approximately 6.3 miles and would also cross the Mississippi River two times. Route alternative E5 would cross six existing transmission lines and would require at least two additional heavy-angle structures to accommodate 90-degree and angled turns along the route.^[1] In addition to requiring two crossings of the Mississippi River, route alternative E5 would require placement of the Project near residences

²³ Ex. EERA-9 at Map 6-14 (EA) (eDocket No. [20246-208129-12](#)).

(including three residences within 0-75 feet, [the width of the Project right-of-way, which may result in displacement](#)). Further, the proposed alignment for route alternative E5 crosses directly over the existing Riverton substation, [rendering the proposed alignment infeasible](#). Existing features around the substation prevent routing around the substation within the route widths evaluated in the EA^[1]. ~~Route alternative E4, t~~The Modified Proposed Route and the Co-location Maximization Route provide more reasonable routing alternatives through this area.^[1]

Finding 121. Alignment alternative AA8 is 1.5 miles long and diverts from the Applicants' Proposed Route where it crosses County Road 128. Alignment alternative AA8 heads southwest along the east side of County Road 128 and then follows the east side of County Road 59 due south around the Cuyuna Recreational Area to just south of State Highway 210. Alignment alternative AA8 does not include any transmission line right-of-way sharing, paralleling, or double-circuiting.^[1] This alignment alternative is unnecessary given its proximity to a residence (within approximately 100 feet) and the incorporation of alignment alternative AA9 into the Modified Proposed Route and route alternative E1 ~~or E4~~ into the Co-location Maximization Route.^[1]

Finding 560. As described in the EA, ~~R~~route ~~A~~alternatives E4 and E5 would both cross a WMA [and result in two crossings of the Mississippi River](#); the corresponding segment of the Proposed Route does not.^[1] [The Co-location Maximization Route would cross a WMA in the same location as Route Alternatives E4 and E5 \(where existing transmission lines are located\) and would not have any crossings of the Mississippi River. Further, selecting either route alternative E4 or route alternative E5 for the Project would result in two transmission line corridors in close proximity: \(1\) a new transmission line corridor for route alternative E4 or route alternative E5 for the Project and \(2\) the existing transmission line corridor that crosses the WMA and Little Rabbit Lake. This will result in greater overall impact when compared to the Co-Location Maximization Route, which will consolidate the Project into the same corridor as the existing transmission lines.](#)

Finding 724. In the Cole Lake to Riverton Region,^[1] the [Applicants' Modified Proposed Route and Co-Location Maximization Route](#) ~~are~~ **is most** consistent with the Commission's routing criteria. In this region, the EA compared the Applicants' Proposed Route to ~~A~~alignment ~~A~~alternative 3 (AA3), ~~R~~route ~~A~~alternatives E1 through E5, ~~A~~alignment ~~A~~alternatives 8, 9, and 10 (AA8, AA9, and AA10), and ~~R~~route ~~A~~alternative G.^[1]

d. **Long Lake Region — ALJ Report Recommended Route Alternative H1 or Modified Route Alternative H4/H7**

The ALJ Report concluded that the Co-location Maximization Route using modified route alternative H4/H7 or route alternative H1 in the Long Lake Region satisfies the routing criteria.²⁴ The ALJ determined that the Co-location Maximization Route (utilizing modified route alternative [H4/H7])²⁵ or route alternative H1 “is most consistent with the Commission’s Routing criteria,”²⁶ and route alternative H1 “minimizes impacts on natural resources including the Wolvert Aquatic Management Area.”²⁷ The Applicants propose to use modified route alternative H4/H7 for the Project. The evidence on the record does not support the use of route alternative H1.

Route alternative H1 is in closer proximity to more residences than the Co-location Maximization Route (which is the same as the Modified Proposed Route in the Long Lake Region).²⁸ The Applicants’ initial outreach did not identify material concerns among landowners along modified route alternative H4/H7. Route alternative H1 will result in impacts to landowners who do not support that route alternative.²⁹ Further, route

²⁴ ALJ Report at Finding 726 and 738 (Nov. 8, 2024) (eDocket No. [202411-211770-02](#)).

²⁵ A map of this modified route alternative H4/H7 is attached to the Applicants’ September 19, 2024 Response to Public Hearing Comments at Attachment A, Appendix 2 (September 19, 2024) (eDocket No. [20249-210355-04](#)).

²⁶ ALJ Report at Finding 726 (Nov. 8, 2024) (eDocket No. [202411-211770-02](#)).

²⁷ ALJ Report at Finding 726 (Nov. 8, 2024) (eDocket No. [202411-211770-02](#)).

²⁸ Ex. EERA-9 at Table 6-97 (EA) (eDocket No. [20246-208129-14](#)); Applicants’ September 19, 2019 Response to Public Hearing Comments at Attachment A at Appendix 3 (September 19, 2024) (eDocket No. [20249-210355-04](#)). The Co-location Maximization Route (which includes modified route alternative H4/H7) has no residences within 0-75 feet, 1 residence within 75-250 feet, 2 residences within 250-500 feet, and 8 residences within 500-1,000 feet, resulting in 11 residences within 0-1,000 feet. Route alternative H1 has no residences within 0-75 feet, 4 residences within 75-250 feet, 7 residences within 250-500 feet, and 25 residences within 500-1,000 feet, resulting in 36 residences within 0-1,000 feet. Ex. EERA-9 at Table 6-97; **Attachment A**.

²⁹ ALJ Report at Findings 230 and 232 (Nov. 8, 2024) (eDocket No. [202411-211770-02](#)).

alternative H1 would result in impacts to a vineyard property that would be avoided by the Co-location Maximization Route. Finally, the Applicants developed modified route alternative H4/H7 in response to public comments to provide a route that maximizes the Project distance from residences, minimizes impacts on private land, and makes the greatest use of tax forfeited land compared to other route alternatives in the area. Modified route alternative H4/H7 has been discussed with the landowners whose property would be crossed by the Co-location Maximization Route and developed based on specific feedback from those landowners. The record does not support inclusion of route alternative H1 in the final Project route.

Therefore, the Applicants propose the following modifications to the ALJ's findings for the Long Lake Region:

Finding 125. Route alternative H1 is 6 miles long and diverts eastward of the Applicants' Proposed Route just north of County Road 24 and heads south for 2 miles around an Aquatic Management Area (AMA). Route alternative H1 then turns southwest for just under 2 miles before turning due south for 1.8 miles where it would parallel an existing transmission line right-of-way to south of County Road 22.^[1] In this area of the Project, the Applicants developed a modification of route alternatives H4 and H7 ([modified route alternative H4/H7](#)) to address many of the comments received from landowners in this area to increase distances between the Project and residences, minimize use of privately-owned lands, and make the greatest use of tax forfeited lands. The Applicants have incorporated modified route alternative H4 ~~and~~ H7 into the Modified Proposed Route and Co-location Maximization Route.^[1] [Modified route alternative H4/H7 provides a more reasonable route for the Project that better conforms to the state routing criteria than route alternatives H1, H2, H3, H4, H5, H6, H7, and K.](#)

Finding 132. Modified route alternatives H4 ~~and~~ H7 [is](#) ~~are~~ approximately 2.9 miles in length and was developed by the Applicants in response to comments received during the public hearings and public hearing comment period. This route alternative maximizes the use of properties owned by Crow Wing County and has been discussed with the county and landowners in this area with no significant concerns raised to date. The Applicants request a route width of approximately 2,000 feet to

allow for flexibility in placement of the HVTL to allow use of property lines along privately-owned parcels and selective placement on properties in this area through cooperation with the private landowners and the county.¹ Modified route alternative H4~~and~~/H7 would decrease the mid-range cost of the Project by approximately \$2.0 million. Route alternative H1 is closer to more residences in the area than H4~~and~~/H7; however, while this difference is due primarily to residences along existing transmission lines that H1 would parallel, route alternative H1 would impact a greater number of residences compared to alternatives. An updated comparison of the modified route alternatives H4 ~~and~~ /H7 is found in Table 1, Appendix 3, Attachment D.¹

Finding 516. There is one residence within 75 feet of route alternative H2, as compared to zero for the corresponding segment of the Proposed Route; in general, route alternatives H1 and H2 have more residences in closer proximity than the Proposed Route.¹

Finding 726. In the Long Lake Region¹ the Applicants' Modified Proposed Route~~route alternative H1 or~~ and the Co-Location Maximization Route are is most consistent with the Commission's routing criteria. In this region, the EA compared the Applicants' Proposed Route to route alternatives H1 through H7, route alternative K, and Aalignment Aalternative 17 (AA17). DOC-EERA included route alternative H1 in Example Full Route Options 1, 2, and 5. Route H1 offers greater paralleling of existing transmission line right-of-way and minimizes impacts on natural resources including the Wolvert Aquatic Management Area¹, but would require construction of the Project through a vineyard.³⁰ Modified route alternative H4/H7, as incorporated into the Modified Proposed Route and the Co-location Maximization Route was developed through careful coordination between the Applicants' and the landowners, including Crow Wing County, whose property is crossed by this alternative. The use of modified route alternative H4/H7 provides a more reasonable route for the Project that conforms to the state routing criteria than route alternative H1.

e. Benton County Elk River Region—ALJ Report Recommended Alternative J2

The ALJ Report concluded that the Co-location Maximization Route and route alternative J2 in the Benton County Elk River Region satisfy the routing criteria.³¹ The ALJ Report determined that route alternative J2 “would avoid Elk River impacts, however,

³⁰ ALJ Report at Finding 257 (Nov. 8, 2024) (eDocket No. [202411-211770-02](#)).

³¹ ALJ Report at Finding 730 and 738 (Nov. 8, 2024) (eDocket No. [202411-211770-02](#)).

they present greater impacts to human settlements in the region.”³² The ALJ Report also noted that the Minnesota Department of Natural Resources (“MnDNR”) supports the use of route alternative J2.³³ The evidence on the record does not support the use of route alternative J2 for the Project.

Route alternative J2 deviates from the existing 69 kV and 230 kV transmission lines along the Elk River and places the Project within 500 feet of more residences that currently do not have a transmission line within that proximity than the Co-location Maximization Route (using the Elk River Alignment Alternative).³⁴ There was consistent opposition to route alternative J2 during the public hearings and in written comments by landowners who would be impacted by that new right-of-way during the public hearing comment period.³⁵

Additionally, route alternative J2 would require new rights-of-way for the Project and result in significantly greater impacts to residential properties and agricultural lands including potential impacts to center-pivot irrigation systems. Selecting route alternative J2 would construct the Project on this new right-of-way while leaving the existing transmission lines in their current location along the Elk River, resulting in two transmission corridors in this area. The Co-location Maximization Route would place the Project in the same corridor as the existing transmission lines, allowing for additional consolidation and co-location opportunities.

³² ALJ Report at Finding 732 (Nov. 8, 2024) (eDocket No. [202411-211770-02](#)).

³³ ALJ Report at Finding 732 (Nov. 8, 2024) (eDocket No. [202411-211770-02](#)).

³⁴ ALJ Report at Finding 518 (Nov. 8, 2024) (eDocket No. [202411-211770-02](#)).

³⁵ ALJ Report at Findings 261, 263, 267, 307, and 308 (Nov. 8, 2024) (eDocket No. [202411-211770-02](#)); see *also* Sauk Rapids Tr. (Aug. 15, 2024) (eDocket no. 20248-209514-14).

In response to questions from the public about potentially combining rights-of-way in the Elk River area, the Applicants developed the Elk River Alignment Alternative, which is incorporated into the Co-location Maximization Route and would combine a portion of the existing Great River Energy 69 kV and 230 kV transmission lines that do not serve a common purpose onto a common structure and place the Project along the existing right-of-way. However, the Applicants determined that further relocation of existing 69 kV and 230 kV transmission lines that do serve a common purpose in the area immediately north of the Benton County Substation cannot be combined for reliability reasons, which makes the relocation of lines along the entire length in the Elk River area not feasible. The record evidence and the ALJ Report support selection of the Elk River Alignment Alternative for the Project and does not support selection of route alternative J2 for the Project.³⁶

Therefore, the Applicants propose the following modifications to the ALJ's findings for the Benton County Elk River Region:

Finding 140. The Applicants' Proposed Route moves generally south throughout the Benton County Elk River region, paralleling the MR Line starting near 75th Street Northeast and ending at the Benton County Substation. This portion of the route is approximately 5 miles in length, crossing roads, agricultural fields, forested areas, and rivers. Although the Applicants' Proposed Route parallels existing transmission lines, this route generally follows the Elk River. Due to the meandering nature of the Elk River, the Applicants' Proposed Route would have multiple river crossings in addition to locating portions of the right-of-way in the river's 100-year floodplain, [where the existing 230 kV and 69 kV transmission lines are located.](#)^[1]

[New Finding 143a. More than ten landowners spoke at the public hearings and provided written comments in opposition to the J route alternatives.](#)^[1]

³⁶ ALJ Report at Findings 261, 263, 267, 307, 308, and 518 (Nov. 8, 2024) (eDocket No. [202411-211770-02](#)).

Finding 730. In the Benton County Elk River Region,^[1] ~~Route Alternative J2~~ the Modified Proposed Route or the Co-Location Maximization Route ~~are~~ is most consistent with the Commission's routing criteria. In this region, the EA compared the Applicants' proposed route to Route Alternatives J1, J2, and J3.^[1]

Finding 731. The Elk River Alignment Alternative, included in the Applicants' Co-location Maximization Route, provides for both consolidation and paralleling of existing transmission lines, which makes this option ~~more~~ consistent with the Commission's routing criteria, more so than the J2 Alternative; the Project would still exist within the Elk River corridor, potentially impacting floodplains, wetlands, vegetation, and wildlife.^[1]

Finding 732. The EA compared the Applicants' proposed route to Route Alternatives J1, J2, and J3, including at least one of the route alternatives in each of the five Example Full Route Options. The J route alternatives would avoid Elk River impacts; however, they present greater impacts to human settlements in the region.^[1] The MnDNR supports the use of either route alternative J2 or a combination of route alternatives J1 and J3 in this region.^[1] Construction along any of the J alternatives would result in two transmission corridors in close proximity: one for the Project and one for the existing 230 kV and 69 kV transmission lines along the Elk River.

2. *Project Routes*

As discussed above, in light of the record in this proceeding and concerns discussed above, the following Findings and Conclusions of Law should be revised:

Finding 736. The record demonstrates that the Applicants' Modified Proposed Route and Co-location Maximization Route, ~~as modified, best~~ satisfies the routing factors in Minn. Stat. § 216E.03, subd. 7 and Minn. R. 7850.4000 and 7850.4100.

Finding 737. The record demonstrates that the Applicants' Modified Proposed Route and Co-location Maximization Route appropriately balances the routing standards and criteria ~~but should be modified to include route alternatives A3 and E4 or E5~~. The Modified Proposed Route is estimated to cost approximately \$173.7 million less than the Co-location Maximization Route using the mid-range estimate. The Co-location Maximization Route will require fewer new transmission line rights-of-way than the Modified Proposed Route.

Finding 738. The record demonstrates that the Applicants' Co-location Maximization Route ~~(1) in the Long Lake region, utilizing route alternatives H4 and H7 or route alternative H1 and (2) in the Benton County~~

~~Elk River region utilizing the Applicant's Co-location Maximization Route or route alternative J2~~ is most consistent with the Commission's ~~routing factors~~ order point to identify additional opportunities for the Project to be co-located with existing high-voltage transmission lines.

Conclusion 9. The record evidence demonstrates that the Modified Proposed Route ~~minimally~~ satisfies the Route Permit criteria set forth in Minn. Stat. § 216E.03, subd. 7(a) and Minn. R. 7850.4100 based on the factors in Minn. Stat. § 216E.03, subd. 7 and Minn. R. 7850.4000.

Conclusion 10. The record evidence demonstrates that the Co-location Maximization Route, ~~as modified herein, best~~ satisfies the Route Permit criteria set forth in Minn. Stat. § 216E.03, subd. 7(a) and Minn. R. 7850.4100 based on the factors in Minn. Stat. § 216E.03, subd. 7 and Minn. R. 7850.4000. The Co-location Maximization Route is shown in **Attachment B**.

Conclusion 11. The record evidence demonstrates that ~~the Co-location Maximization Route (1) in the Iron Range Substation Region, utilizing route alternative A3, (2) in the Cole Lake Riverton Region, using route alternative E4 or E5, (3) in the Long Lake region, utilizing route alternatives H4 and H7 (as proposed by the Applicants) or route alternative H1 and (4) in the Benton County Elk River region utilizing the applicant's Co-location Maximization route or route alternative J2~~ satisfies the Route Permit criteria set forth in Minn. Stat. § 216E.03, subd. 7(a) and Minn. R. 7850.4100 based on the factors in Minn. Stat. § 216E.03, subd. 7 and Minn. R. 7850.4000. constructing the Project along the Modified Proposed Route does not present a potential for significant environmental effects pursuant to the Minnesota Environmental Rights Acts, Minn. Stat. §§ 116B.01-116B.13, and the Minnesota Environmental Policy Act, Minn. Stat. §§ 116D.01-116D.11.

Conclusion 12. The record evidence demonstrates that constructing the Project along the Co-location Maximization Route ~~as modified~~ does not present a potential for significant environmental effects pursuant to the Minnesota Environmental Rights Acts, Minn. Stat. §§ 116B.01-116B.13, and the Minnesota Environmental Policy Act, Minn. Stat. §§ 116D.01-116D.11.

Conclusion 14. The evidence on the record demonstrates that the Co-location Maximization Route ~~utilizing route alternative A3 in the Iron Range Substation region, E4 or E5 in the Cole Lake Riverton region, H1 in the Long Lake region and/or route alternative J2 in the Benton County Elk River region~~ provides a reasonable and prudent route for the Project.

Based on the record in this proceeding, these revisions should be incorporated into any final order of the Commission for the Project.

3. *Project Conclusions*

In her report, the ALJ reached the following Conclusions of Law regarding routing of the Project:

Conclusion 9. The record evidence demonstrates that the Modified Proposed Route minimally satisfies the Route Permit criteria set forth in Minn. Stat. § 216E.03, subd. 7(a) and Minn. R. 7850.4100 based on the factors in Minn. Stat. § 216E.03, subd. 7 and Minn. R. 7850.4000.

Conclusion 10. The record evidence demonstrates that the Co-location Maximization Route, as modified herein, best satisfies the Route Permit criteria set forth in Minn. Stat. § 216E.03, subd. 7(a) and Minn. R. 7850.4100 based on the factors in Minn. Stat. § 216E.03, subd. 7 and Minn. R. 7850.4000, although the estimated cost is approximately \$173.7 million more than the Modified Proposed Route using the mid-range estimate. The Co-location Maximization Route is shown in **Attachment B**.

Conclusion 11. The record evidence demonstrates that the Co-location Maximization Route (1) in the Iron Range Substation Region, utilizing route alternative A3, (2) in the Cole Lake Riverton Region, using route alternative E4 or E5, (3) in the Long Lake region, utilizing route alternative[] [H4/H7] (as proposed by the Applicants) or route alternative H1 and (4) in the Benton County Elk River region utilizing the applicant's Co-Location Maximization route or route alternative J2 satisfies the Route Permit criteria set forth in Minn. Stat. § 216E.03, subd. 7(a) and Minn. R. 7850.4100 based on the factors in Minn. Stat. § 216E.03, subd. 7 and Minn. R. 7850.4000.

In Conclusion of Law 9, the ALJ concluded that the Modified Proposed Route “minimally satisfies” the criteria that the Commission must consider in deciding on a route for a route permit proceeding. There is nothing in Minnesota Statutes or Minnesota Rules that uses the term “minimally” when directing the Commission to make a routing determination. Instead, a route will either meet the routing criteria or not meet the routing

criteria.³⁷ The Modified Proposed Route meets the routing criteria in Minn. Stat. § 216E.03, subd. 7 and Minn. R. 7850.4000 and does not violate any of the routing prohibitions that exist in Minnesota law or Commission rules. Therefore, Conclusion of Law 9 should be revised as follows:

Conclusion 9. The record evidence demonstrates that the Modified Proposed Route **minimally** satisfies the Route Permit criteria set forth in Minn. Stat. § 216E.03, subd. 7(a) and Minn. R. 7850.4100 based on the factors in Minn. Stat. § 216E.03, subd. 7 and Minn. R. 7850.4000.

In Conclusion of Law 10, the ALJ Report states that the Co-location Maximization Route should be modified as outlined in Conclusion of Law 11. However, the cost estimate provided in the ALJ Report was for the Co-location Maximization Route without the ALJ's recommended modifications. Applying the mid-range estimate of the costs provided by the Applicants in this record to the Co-location Maximization Route, as modified by the ALJ would result in a minimum total mid-range cost of \$1,289.1 to \$1,305.3 million, depending on which combination of the ALJ's recommended route alternatives is included.³⁸ However, as noted in the Applicants' previous comments and discussed further below, no costs have been included in these estimates for relocating the Riverton Substation or displacing residences as required to accommodate route alternative E4 or E5.³⁹ Based on the Applicants' detailed evaluation of route alternative E1, which includes modifications to the Riverton Substation and other transmission facilities in the area, the added cost of relocating the Riverton Substation is likely to make the final cost for route

³⁷ Minn. Stat. § 216E.03, subd. 7 and Minn. R. 7850.4000.

³⁸ Applicant's September 19, 2024 Comments at Attachment C at Appendix 4 (Sep. 19, 2024) (eDocket No. [20249-210359-05](#)).

³⁹ Applicants' September 19, 2024 Response to Public Hearing Comments at Attachment D at 4 and Attachment E at 14-19 (Sep. 19, 2024) (eDocket No. [20249-210359-05](#)).

alternative E4 or route alternative E5 equivalent to or higher than the estimate for route alternative E1. As a result, the ALJ's recommended modifications in this area are likely to result in a total Project cost similar to or higher than the Co-Location Maximization Route.

Therefore, Conclusion of Law 10 should be revised as follows:

Conclusion 10. The record evidence demonstrates that the Co-location Maximization Route, ~~as modified herein, best~~ satisfies the Route Permit criteria set forth in Minn. Stat. § 216E.03, subd. 7(a) and Minn. R. 7850.4100 based on the factors in Minn. Stat. § 216E.03, subd. 7 and Minn. R. 7850.4000, ~~although t~~The estimated cost of the Co-location Maximization Route, as proposed by the Applicants, is approximately \$173.7 million more than the Modified Proposed Route using the mid-range estimate. The estimated cost of the Co-location Maximization Route, as modified herein, is at least \$94.9 to \$111.1 million more than the Modified Proposed Route using the mid-range estimate, and likely much more when the full costs of relocating the Riverton Substation for Route Alternatives E4 or E5 are included. The Co-location Maximization Route is shown in **Attachment B**.

Conclusion of Law 11 includes several typographical errors that should be corrected, if the Commission were to adopt this conclusion. In Section II.A.1, the Applicants discuss why Conclusion of Law 11 is inconsistent with the record and with the findings in the ALJ Report. Accordingly, the Applicants request that the Conclusion of Law 11 be deleted from the Report. To the extent the Commission, instead, adopts the ALJ Report in its entirety, the Applicants provide these suggested revisions to Conclusion of Law 11 for purposes of clarity:

Conclusion 11. The record evidence demonstrates that the Co-location Maximization Route (1) in the Iron Range Substation Region, utilizing route alternative A3, (2) in the Cole Lake Riverton Region, using route alternative E4 or E5, (3) in the Long Lake region, utilizing ~~route alternatives H4 and H7 (as proposed by the Applicants)~~ modified route alternative H4/H7 or route alternative H1 and (4) in the Benton County Elk River ~~R~~region utilizing the ~~applicant's~~ Applicants' Co-Location Maximization ~~R~~route or route alternative J2 satisfies the Route Permit criteria set forth in Minn. Stat. § 216E.03, subd. 7(a) and Minn. R. 7850.4100 based on the factors in Minn. Stat. § 216E.03, subd. 7 and Minn. R. 7850.4000.

B. Route Permit, Including Standard Permit Conditions Modifications

1. Draft Route Permit Revisions

In their September 19, 2024 Response to Public Hearing Comments, the Applicants proposed revisions to the following standard following standard permit conditions in the Draft Route Permit: 1, 2.1, 2.2, 3, 4, 5, 5.2, 5.3.1, 5.3.8, 5.3.10, 5.3.11, 5.3.21, 9.1, and 9.2. The Applicants also identified specific permit conditions 6.1 through 6.7. In its October 3, 2024 comments, DOC-EERA agreed with some of the Applicants' proposed revisions and objected to others. Specifically, DOC-EERA stated that it agreed with or did not object to the Applicants' proposed standard conditions in Sections 1, 2, 4, 5.3.1, 5.3.11, 5.3.21, and 9.1 of the Draft Route Permit, and proposed special conditions in Sections 6.3, 6.4, 6.5, 6.6, and 6.7. Findings 739 and 740 of the ALJ Report recommend that the Commission adopt DOC-EERA's recommendations. Upon further review, the Applicants do not object to DOC-EERA's position on Sections 3,⁴⁰ 5.2, 5.3.8, 5.3.10, and 9.2 of the Draft Route Permit. Because the ALJ Report does not go into detail regarding the draft permit conditions, to aid in the Commission's consideration of these issues, the Applicants provide further detail in this filing regarding the Applicants' position concerning the permit conditions for which there is not currently agreement among the Applicants and DOC-EERA – specifically, Sections 5, 6.1, and 6.2. The Applicants are also providing

⁴⁰ As noted in Applicants' September 19, 2024 Response to Public Hearing Comments, revisions to Section 3 of the Route Permit were requested to specify that the Plan and Profile filing will specify the final substation footprints. As discussed in Applicants' prior filings, the specific location of these facilities will depend upon further landowner coordination and the final route selected by the Commission. DOC-EERA believes that this revision is "unnecessary." Given DOC-EERA's position that the Applicants' requested revisions are not needed, the Applicants do not object to DOC-EERA's position on Section 3, understanding that the specific footprints have not yet been identified for each substation site, but that they will be so identified in the Plan and Profile filing.

more detailed findings related to permit conditions at **Attachment B** of this filing. The Applicants request that these findings replace Findings 739 and 740 in the ALJ Report.

2. *Draft Route Permit Section 5*

The Applicants proposed the addition of the following text to Section 5 of the Draft Route Permit: “The Permittees may, but are not required, to submit any compliance filings required under this route permit immediately after the Commission’s oral decision regarding the route permit and prior to the Commission’s written decision.”⁴¹ In support of this revision, the Applicants noted that the clarification is consistent with recently-enacted Minnesota law,⁴² which specifies that “the applicant may submit to commission staff for review preconstruction compliance filings” prior to the issuance of a written order. DOC-EERA recommended that the Applicants’ proposed addition to Section 5 not be incorporated because it “is unnecessary,” explaining that there is no statute or rule prohibiting early compliance filings, but that DOC-EERA “must have a written Commission order and permit” to review compliance filings. The Applicants request that DOC-EERA staff consider this position more closely, given that new Minn. Stat. § 216I.05, subd. 12(e) specifically recognizes that review can commence pre-order: “the applicant may submit to commission staff *for review* preconstruction compliance filings” prior to the issuance of a written order. The Applicants understand that approval of those filings could not occur until a written order has issued and are willing to coordinate with DOC-EERA regarding a process for such review going forward.

⁴¹ New Findings for the Draft Route Permit is attached to the Applicants’ November 25, 2024 Exceptions to the Findings of Fact, Conclusions of Law, and Recommendations of the Administrative Law Judge at **Attachment B**.

⁴² Minn. Stat. § 216I.05, subd. 12(e).

C. Special Permit Conditions

The ALJ recommended that the special permit condition revisions proposed by the Applicants, as modified by DOC-EERA in its reply comments, should be incorporated into the Route Permit.⁴³ In particular, these conditions relate to the Vegetation Management Plan (“VMP”) and the Agricultural Impact Mitigation Plan (“AIMP”) for the Project. The Applicants continue to support the appropriateness of their proposed special permit conditions for the VMP and AIMP for the Project and respectfully request the Commission include them in the Route Permit for the reasons described herein. The Applicants recommend the following modifications to the ALJ Report related to the VMP and AIMP:

Finding 740. In its Draft Route Permit, DOC-EERA recommended certain special conditions.^[1] The Applicants provided multiple revisions to the Draft Route Permit, including special conditions.^[1] The MnDNR also recommended several topics for special conditions.^[1] The revisions proposed by the Applicants^[1] ~~as modified by EERA in its reply comments~~ are reasonable and should be incorporated into the Route Permit along with the following special conditions:

- Vegetation Management Plan: The Permittees filed with their Application a vegetation management plan (VMP) for review and comment by all interested persons, including EERA and the MnDNR. The Permittees shall revise the VMP to include the following revisions:
 - Avoidance plans should be incorporated into the VMP as appropriate.
 - Any conditions related to vegetation management associated with any permits issued by a state or federal agency for the Permitted Route that have been identified as of the date the VMP is filed with the Commission prior to commencing Project vegetation clearing or construction, with the understanding that the VMP shall also include a condition that any additional vegetation management conditions necessary for compliance with any state or federal permit issued for the Project not

⁴³ ALJ Report at Finding. 740 (Nov. 8, 2024) (eDocket No. [202411-211770-02](#)).

explicitly identified in the VMP at the time of filing will be incorporated by reference.^[1]

The Permittees shall file the VMP with these revisions incorporated with the Commission, as applicable, with the plan for vegetation clearing under Section 6.1.6 required under this permit or with the plan and profile required under Section 9.2 of this permit. The Permittees shall provide all landowners along the route with copies of the VMP and an electronic copy (including by website address shall be sufficient). The Permittees shall file an affidavit of its distribution of the VMP to landowners with the Commission no later than, as applicable, with the filing of plan for vegetation clearing or the compliance filing required under Section 5.3.1 of this Permit. Such notice to landowners may be provided for only those portions of the Project that are the subject of the plan for vegetation clearing for each phase of the Project.

- **Agricultural Impact Mitigation Plan:** The Permittee developed an agricultural impact mitigation plan (AIMP) in coordination with the MDA that includes all revisions requested by the MDA. The Permittees shall provide all affected landowners with a copy of the plan.

The Applicants' intent with including a draft VMP and AIMP with its Combined Application for a Certificate of Need and Route Permit was to proactively present such plans for the Commission's and stakeholders' consideration to more efficiently navigate the permitting process for the Project and allow for transparent coordination regarding these plans. While DOC-EERA states in its October 3, 2024 Reply Comments that it "believes that the applicants are suggesting that since they provided a draft VMP with their application and there have been limited comments to date in the record regarding the VMP that no further consultation with EERA or the Minnesota Department of Natural Resources (DNR) is necessary,"⁴⁴ it was not the Applicants' intent to limit consultation with DOC-EERA or the MnDNR. Rather, given that both DOC-EERA and MnDNR are

⁴⁴ DOC-EERA Response to Comments on the EA at 11(Oct. 3, 2024) (eDocket No. [202410-210700-01](#))

active participants in the Commission’s permitting process, Applicants had anticipated active engagement and input regarding those plans would have occurred as part of the permitting process, just as state agencies regularly provide input on other minimization and mitigation measures during this process.⁴⁵ DOC-EERA stated a similar concern regarding the AIMP, but otherwise did not identify any particular modifications that were necessary. Notably, the draft VMP and AIMP have been filed publicly in this docket since August 2023. The AIMP has been reviewed by the Minnesota Department of Agriculture and all comments received have been incorporated in the AIMP.⁴⁶ DOC-EERA also stated that “staff is unaware of any route permit issued by the Commission that. . . does not require post-permit consultation with EERA and DNR.” Applicants note, however, that the requirement for a VMP is relatively new and has been implemented on only a few transmission line projects. Applicants propose these revisions to make this condition more consistent with the balance of the compliance process and to eliminate unnecessary post-permit delays that have real schedule impacts. In particular, the post-permit coordination on the VMP with EERA and MnDNR is not currently subject to any specific timelines or deadlines, which introduces significant schedule uncertainty. The Applicants will identify any changes made to the VMP and AIMP that are necessary to reflect the final Commission-approved route with the Commission as a compliance filing.

The Applicants also proposed to file the VMP at the same time as the plan and profile compliance filings. Currently, the draft route permit requires the VMP to be submitted at least 14 days prior to the plan and profile compliance filings. DOC-EERA’s

⁴⁵ Minn. Stat. § 216E.10, subd. 3(a).

⁴⁶ The revised AIMP was filed as Direct Schedule 7 to the Direct Testimony of Minnesota Power witness Zach Golkowski. Ex. APP-34 at 16 (Golkowski Direct) (eDocket No. [20247-208392-02](#)).

comments did not address the Applicants' request to align these filing deadlines (although elsewhere DOC-EERA has not objected to this revision), and the Applicants are not aware of any justification for requiring that the VMP be filed two weeks before the plan and profile filing, and DOC-EERA has agreed to this alignment in other proceedings.⁴⁷ In practice, these disparate deadlines impact project schedules. The Applicants respectfully request that they be allowed to submit the VMP at the same time as the plan and profile and other related compliance filings.

D. The Draft Route Permit

The Applicants prepared a redlined version of the Draft Route Permit that reflects the changes to conditions and additional special conditions that are discussed in these Exceptions and Clarifications. The Draft Route Permit is provided as **Attachment C**⁴⁸ to this filing.

E. Clarifications

1. Revisions to Findings

There are a few locations in the ALJ Report where clarifications are proposed by the Applicants for consistency. The Applicants propose the following revisions:

Finding 160. ~~Should~~ Depending on the final route selected by the Commission ~~select the Modified Proposed Route~~, there may be various locations along it where the existing transmission lines will need to be realigned, relocated, reconfigured, or replaced. The structure types to be used at these locations include, but are not limited to, typical wood or steel and typical monopole or H-frame structure types. The structure designs will

⁴⁷ EERA Reply Comments, *In the Matter of the Application of Great River Energy for a Route Permit for the 115-kV Pilot Knob to Burnsville Rebuild and Upgrade Project in Dakota County, Minnesota*, Docket ET2/TL-23-410 (Sept. 23, 2024).

⁴⁸ Attachment C is provided in two parts: (1) Attachment C-1 is a complete draft of the Route Permit that reflects the revisions previously agreed to between the Applicants and DOC-EERA; (2) Attachment C-2 is a file that provides a comparison of Attachment C-1 against the Draft Route Permit included by DOC-EERA in the EA.

be driven by an effort to minimize impacts to landowners to the extent practicable.^[1]

Finding 592. Impacts to agricultural properties may vary by route. For example, route alternative G would cross more acres of agriculture than the Proposed Route (38 acres compared to 7 acres) [and impact center pivot irrigation systems.](#)^[1]

Finding 721. Route alternative B was included in Example Full Route Options 1, 2, 4, and 5, as it maximizes paralleling of existing transmission lines and rights-of-way, while minimizing impacts on cultural resources and residences. However, route alternative B would impact more forested vegetation, native plant communities, and candidate old-growth areas, while the Applicants' Proposed Route would affect more Sites of Biodiversity Significance, native plant communities, and pass through a ~~WMA Wildlife Management Area.~~^[1] [Further, route alternative B is not constructable because of height restrictions for the Hill City Airport in this area and, even if the Project could be constructed at the limited height, the Federal Aviation Administration would need to approve any construction in this area.](#)⁴⁹

2. *New Recommendation*

The Applicants propose a new recommendation to be incorporated into the order granting a Certificate of Need for the Project that would expressly permit the Applicants to submit a compliance filing with updated costs based upon the Commission's final determination as to the route for the Project. Overall cost estimates for the Project may need to be updated based upon the final route chosen by the Commission for the Project, which is necessary to have appropriate baseline cost estimates for future cost recovery requests.

[\[NEW RECOMMENDATION\] The cost of the Modified Proposed Route is anticipated to be in the range of \\$980 Million to \\$1,366.9 Million in 2022 dollars. The cost of the Co-location Maximization Route, as proposed by the Applicants, is anticipated to be in the range of \\$1,122.5 Million to](#)

⁴⁹ Applicants' Comments on the EA and Additional Information Requested at Public Hearings, Attachment 1 at 1-2 (Aug. 5, 2024) (eDocket No. [20248-209266-02](#)). Applicants determined that pole heights adjacent to the Hill City-Quadna Mountain Airport would need to be no taller than 80 feet. Consultants, Capital Airspace Group, advised that much of Route Alternative B would require structure heights between 36-feet to 67-feet due to FAA rules.

\$1,565.8 Million in 2022 dollars. Should any revisions be made to either of these routes, costs are anticipated to change. If the Commission approves a route for the Project that differs from either of these routes, the Applicants should be permitted to make a compliance filing within 60 days of the Commission's written order to revise the Project cost estimates in 2022 dollars. Additionally, Minnesota Power bears the burden of proof in any future regulatory proceeding related to the recovery of costs above cost estimates provided in any compliance filing.

III. CONCLUSION

The Applicants respectfully recommend that the Commission adopt the Applicants' exceptions and clarifications to the ALJ Report for the Project.

Dated: November 25, 2024

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| Resource | Element | Route Alternative H1 | Modified H4/H7 Alternative* |
|------------------|--|----------------------|-----------------------------|
| Human Settlement | Residences within 0-75 feet (count) | 0 | 0 |
| | Residences within 75-250 feet (count) | 4 | 1 |
| | Residences within 250-500 feet (count) | 7 | 2 |
| | Residences within 500-1,000 feet (count) | 25 | 8 |

* Residence counts differ from the Applicant's filing on September 19, 2024 (Appendix 3 to Attachment A) due to different lengths of route being analyzed. Route lengths compared above are consistent with the Environmental Assessment.

Route Permit Conditions – Proposed Findings to be added

1. The Applicants proposed revisions to the following standard permit conditions in the Draft Route Permit: 2.1, 2.2, 3, 4, 5, 5.2, 5.3.1, 5.3.8, 5.3.10, 5.3.11, 5.3.21, 9.1, and 9.2. The Applicants also proposed various revisions and clarifications throughout the Draft Route Permit, including Section 1, regarding the Project description and details.

2. In its October 3, 2024 comments, DOC-EERA stated that it agreed with or did not object to the Applicants' proposed revisions in Sections 1, 2, 4, 5.3.1, 5.3.11, 5.3.21, and 9.1 of the Draft Route Permit.

3. In their November 25, 2024 filing, the Applicants stated that they did not object to DOC-EERA's position on Sections 3, 5.2, 5.3.8, 5.3.10, and 9.2 of the Draft Route Permit. With respect to Section 3, specifically, the Applicants did not object to DOC-EERA's position given DOC-EERA's comments that the Applicants' requested revisions were not necessary.

4. The record supports the Applicants' proposed revisions to Sections 1, 2, 4, 5.3.11, 5.3.21, and 9.1 of the Draft Route Permit, as also agreed or not objected to by DOC-EERA. The record further supports that the Applicants have not objected to DOC-EERA's position on Sections 3, 5.2, 5.3.8, 5.3.10, and 9.2 of the Draft Route Permit.

5. The Applicants proposed the addition of the following text to Section 5 of the Draft Route Permit: "The Permittees may, but are not required, to submit any compliance filings required under this route permit immediately after the Commission's oral decision regarding the route permit and prior to the Commission's written decision." In support of this revision, the Applicants noted that the clarification is consistent with recently-enacted Minnesota law, which specifies that "the applicant may submit to commission staff *for review* preconstruction compliance filings" prior to the issuance of a written order.¹ The Applicants are willing to coordinate with EERA regarding a process for such review going forward, and understand that approval of the compliance filings will not occur until after a written order has issued.

6. DOC-EERA recommended that the Applicants' proposed addition to Section 5 not be incorporated because it "is unnecessary," explaining that there is no statute or rule prohibiting early compliance filings, but that DOC-EERA "must have a written Commission order and permit" to review compliance filings.

7. The record supports the Applicants' proposed Section 5 revisions because it is consistent with newly-enacted Minnesota law, which specifies that, in the future, compliance filings may be submitted for staff review prior to the issuance of a written order.

¹ Minn. Stat. § 2161.05, subd. 12(e).

8. The Applicants proposed seven special permit conditions in the Draft Route Permit (Sections 6.1 through 6.7). DOC-EERA stated that it agreed with the Applicants' proposed conditions in Sections 6.3, 6.4, 6.5, 6.6, and 6.7.

9. The record supports the conditions in Sections 6.3, 6.4, 6.5, 6.6, and 6.7 of the Draft Route Permit, as agreed upon by the Applicants and DOC-EERA.

10. The Applicants proposed the following Section 6.1 to the Route Permit:

Vegetation Management Plan: The Permittees filed with their Application a vegetation management plan (VMP) for review and comment by all interested persons, including EERA and the MnDNR. The Permittees shall revise the VMP to include the following revisions:

Avoidance plans should be incorporated into the VMP as appropriate.

Any conditions related to vegetation management associated with any permits issued by a state or federal agency for the Permitted Route that have been identified as of the date the VMP is filed with the Commission prior to commencing Project vegetation clearing or construction, with the understanding that the VMP shall also include a condition that any additional vegetation management conditions necessary for compliance with any state or federal permit issued for the Project not explicitly identified in the VMP at the time of filing will be incorporated by reference.

The Permittees shall file the VMP with these revisions incorporated with the Commission, as applicable, with the plan for vegetation clearing under Section 6.1.6 required under this permit or with the plan and profile required under Section 9.2 of this permit. The Permittees shall provide all landowners along the route with copies of the VMP and an electronic copy (including by website address shall be sufficient). The Permittees shall file an affidavit of its distribution of the VMP to landowners with the Commission no later than, as applicable, with the filing of plan for vegetation clearing or the compliance filing required under Section 5.3.1 of this Permit. Such notice to landowners may be provided for only those portions of the Project that are the subject of the plan for vegetation clearing for each phase of the Project.

11. Regarding Section 6.1, the Applicants explained that they carefully developed a draft VMP for filing with the Application to allow for review by any interested

person, including state agencies, and comment during the route permit proceeding to ensure timely review of its contents. To date, no comments have been received on the VMP and the items originally listed that must be included in the VMP have already been included in the draft filed with the Application. The revisions to this special condition also contemplate that the Project may not be constructed all at the same time and may occur in phases. Further, the Applicants proposed that the VMP could be filed at the same time as the plan and profile compliance filings to consolidate the timing of compliance filings.

12. DOC-EERA opposed Applicants' proposed Section 6.1, stating other route permits issued by the Commission require post-permit consultation with DOC-EERA and MnDNR, and that the content of the VMP may depend upon the route selected for the Project.

13. The record supports the Applicants' proposed Section 6.1 for the reasons described by the Applicants. This proposed Section 6.1 also allows for transparent coordination regarding the VMP, acknowledges that DOC-EERA and MnDNR are already active participants in the Commission's permitting process, and reduces schedule uncertainty regarding the post-permit compliance process.

14. The Applicants proposed the following Section 6.2:

Agricultural Impact Mitigation Plan: The Permittee developed an agricultural impact mitigation plan (AIMP) in coordination with the MDA that includes all revisions requested by the MDA. The Permittees shall provide all affected landowners with a copy of the plan.

15. Regarding Section 6.2, the Applicants stated that Applicants worked with the Minnesota Department of Agriculture on an agricultural impact mitigation plan, incorporated all revisions requested by the Minnesota Department of Agriculture, and provided a copy of that revised plan to the Minnesota Department of Agriculture. A copy of that plan was provided with the Applicants' Direct Testimony.² Therefore, the Applicants believe it would be appropriate for this condition to reflect the final plan.

16. DOC-EERA opposed Applicants' proposed Section 6.2 for the same reasons it provided with respect to the Section 6.1, regarding the VMP.

17. The record supports the Applicants' proposed Section 6.2 for the reasons identified by the Applicants.

² The revised AIMP was filed as Direct Schedule 7 to the Direct Testimony of Minnesota Power witness Zach Golkowski. Ex. APP-34 at 16 (Golkowski Direct) (eDocket No. [20247-208392-02](#)).

STATE OF MINNESOTA PUBLIC UTILITIES COMMISSION

**ROUTE PERMIT FOR THE
NORTHLAND RELIABILITY PROJECT**

A HIGH-VOLTAGE TRANSMISSION LINE AND ASSOCIATED FACILITIES

IN

AITKIN, BENTON, CROW WING, ITASCA, MORRISON, AND SHERBURNE COUNTIES

ISSUED TO

MINNESOTA POWER AND GREAT RIVER ENERGY

PUC DOCKET NO. 22-415

In accordance with the requirements of Minnesota Statutes Chapter 216E and Minnesota Rules Chapter 7850 this route permit is hereby issued to:

MINNESOTA POWER AND GREAT RIVER ENERGY

Minnesota Power and Greater River Energy are authorized by this route permit to construct and operate an approximately 180-mile 345 kV double-circuit transmission line in Aitkin, Benton, Crow Wing, Itasca, Morrison, and Sherburne Counties, Minnesota.

The high-voltage transmission line shall be constructed within the route identified in this route permit and in compliance with the conditions specified in this route permit.

Approved and adopted this ____ day of _____, 2024

BY ORDER OF THE COMMISSION

Will Seuffert,
Executive Secretary

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ATTACHMENTS

Attachment 1 – Complaint Handling Procedures for Permitted Energy Facilities

Attachment 2 – Compliance Filing Procedures for Permitted Energy Facilities

Attachment 3 – Route Permit Maps

1 ROUTE PERMIT

The Minnesota Public Utilities Commission (Commission) hereby issues this route permit to Minnesota Power and Great River Energy (Permittees) pursuant to Minnesota Statutes Chapter 216E and Minnesota Rules Chapter 7850. This route permit authorizes the Permittees to construct and operate an approximately 180-mile double-circuit 345 kV transmission line and associated facilities in Aitkin, Benton, Crow Wing, Itasca, Morrison, and Sherburne Counties, Minnesota (Northland Reliability Project, henceforth known as Transmission Facility or Project). The high-voltage transmission line shall be constructed within the route identified in this route permit and in compliance with the conditions specified in this route permit.

1.1 Pre-emption

Pursuant to Minn. Stat. § 216E.10, this route permit shall be the sole route approval required for construction of the transmission facilities and this route permit shall supersede and preempt all zoning, building, or land use rules, regulations, or ordinances promulgated by regional, county, local and special purpose governments.

2 TRANSMISSION FACILITY DESCRIPTION

Minnesota Power and Great River Energy will construct and co-own an approximately 180-mile 345 kV double-circuit transmission line that consists of two segments:

- 1) Segment 1: construction of a new, approximately 140-mile long, double-circuit 345 kilovolt (“kV”) transmission line connecting the expanded Iron Range Substation, a new Cuyuna Series Compensation Station (described below), and the new Cherry Park Substation; and
- 2) Segment 2: replacement of two existing high-voltage transmission lines.
 - a) Replace an approximately 20-mile 230 kV line with two 345 kV circuits from the Cherry Park Substation to the new Xcel Energy Big Oaks Substation along existing high-voltage transmission right-of-way on double-circuit 345 kV structures; and
 - b) Replace an approximately 20-mile 345 kV line from the Cherry Park Substation to the existing Xcel Energy Sherco Substation in Sherburne County along existing high-voltage transmission right-of-way using double-circuit 345 kV structures.

The Transmission Facility is located in the following: *[to be completed after designation of route by Commission]*

| County | Township Name | Township | Range | Section |
|--------|---------------|----------|-------|---------|
| Aitkin | | | | |
| Benton | | | | |

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| | | | | |
|-----------|--|--|--|--|
| | | | | |
| Crow Wing | | | | |
| Itasca | | | | |
| Morrison | | | | |
| Sherburne | | | | |

2.1 Structures

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The transmission line will primarily consist of double-circuit, tubular steel monopole structures with V-string insulators. These structures will be approximately 130 to 170 feet above ground and spaced 800 to 1,000 feet apart depending upon the terrain and environmental constraints. The average diameter of the monopole foundations will be 7 to 10 feet, with specialty structures, including double pole structures, having wider foundation diameters. The diameter of each monopole will be narrower than the diameter of each foundation.

Portions of the Transmission Facility in Sherburne County will consist of triple-circuit, tubular steel monopole structures with a 69 kV underbuild position to accommodate an existing 69-kV transmission line. These monopoles will include V-string and I-string insulators for the 345 kV and 69 kV conductors, respectively. Structures will be approximately 140 to 180 feet above ground and spaced 600 to 800 apart.

Where existing transmission lines will be realigned, relocated, reconfigured, or replaced, the structure types will include, but are not limited to, typical wood or steel monopole or H-frame structures. These structures will be approximately 60 to 180 feet above ground and spaced 300 feet to 1,000 feet apart, depending on the structure type used.

2.2 Conductors

The Permittees will use two different conductor types for the project: a bundled twisted pair-type aluminum conductor steel reinforced (T2-ACSR) or similar type and a bundled aluminum conductor steel supported (ACSS) or similar type.

The table below details specifics on the various structure and conductor types as presented in the route permit application.

| Line Type | Conductor ^[3] | Structure | | Foundation | Approx. Height (feet) | Approx. Span (feet) |
|--|--------------------------|-----------|----------|--------------------------------|-----------------------|---------------------|
| | | Type | Material | | | |
| Double-Circuit 345/345 kV | T2-ACSR or ACSS | Monopole | Steel | Concrete Pier | 130-170 | 800-1,000 |
| Single-Circuit 230 kV | T2-ACSR or ACSS | H-frame | Wood | Direct Embed ^[1] | 65-90 | 700-900 |
| Single-Circuit 115 kV | T2-ACSR or ACSS | H-frame | Wood | Direct Embed | 60-80 | 600-800 |
| Single-Circuit 69 kV Rebuild ^[2] | T2-ACSR or ACSS | Monopole | Wood | Direct Embed | 60-80 | 300-500 |
| Triple-Circuit 345/345/69 kV | T2-ACSR or ACSS | Monopole | Steel | Concrete Pier | 140-180 | 600-800 |

Note: The values in the table are typical values expected for the majority of tangent structures based on similar facilities. Actual values may vary.

[1] Certain specialty or storm structures may be necessary. These structures may be concrete pier foundations instead of direct embed.

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- [2] Single-circuit 69 kV transmission line, and associated switch structures, will be replaced in Sherburne County for the Great River Energy's existing 69 kV transmission line (EW Line) from West Becker Switch and West End Substation, where the EW Line will be built to 115 kV capable. There is approximately 1,345 feet of single-circuit 69 kV replacement to 115 kV capable within the uncrossing area between the Cherry Park Substation to Big Oaks Substation line (also known to as the MR Line) and the Cherry Park Substation to Sherco Substation line (also known as the GRE-BS Line). GRE's 69 kV EW Line easement width varies from 70 to 100 feet in width.
- [3] T2-ACSR = horizontally bundled twisted pair-type aluminum conductor steel reinforced type conductor. ACSS = a horizontally bundled aluminum conductor steel supported type conductor.

2.3 Substations and Associated Facilities

The project will involve expansion and/or construction of the following substations:

- Expansion of the existing Iron Range Substation, located near Grand Rapids;
- Expansion of the existing Benton County Substation, located near St. Cloud (to be called the Cherry Park Substation);
- Construction of a new Cuyuna Series Compensation Station near the existing Riverton Substation.

3 DESIGNATED ROUTE

The route designated by the Commission is depicted on the route maps attached to this route permit (Designated Route). The Designated Route is generally described as follows:

[To be completed after designation of route by Commission]

The Designated Route includes an anticipated alignment and a right-of-way. The right-of-way is the physical land needed for the safe operation of the transmission line. The Permittees shall locate the alignment and associated right-of-way within the Designated Route unless otherwise authorized by this route permit or the Commission. The Designated Route provides the Permittees with flexibility for minor adjustments of the alignment and right-of-way to accommodate landowner requests and unforeseen conditions.

Any modifications to the Designated Route or modifications that would result in right-of-way placement outside the Designated Route shall be specifically reviewed by the Commission in accordance with Minn. R. 7850.4900 and Section 10 of this route permit.

4 RIGHT-OF-WAY

This route permit authorizes the Permittees to obtain a new permanent right-of-way for the transmission lines authorized by this Route Permit of approximately 150 feet in width for each line. The permanent right-of-way is typically 75 feet on both sides of the transmission line measured from its centerline or alignment. Some areas of the Transmission Facility may require wider rights-of-way based on actual design conditions.

The anticipated alignment is intended to minimize potential impacts relative to the criteria identified in Minn. R. 7850.4100. The final alignment must generally conform to the anticipated alignment identified on the route maps unless changes are requested by individual landowners and agreed to by the Permittees or for unforeseen conditions that are encountered or as otherwise provided for by this route permit.

Any right-of-way or alignment modifications within the Designated Route shall be located so as to have comparable overall impacts relative to the factors in Minn. R. 7850.4100, as does the right-of-way and alignment identified in this route permit, and shall be specifically identified and documented in and approved as part of the plan and profile submitted pursuant to Section 9.2 of this route permit.

Where the transmission line parallels existing highway and other road rights-of-way, the transmission line right-of-way shall occupy and utilize the existing right-of-way to the maximum extent possible; consistent with the criteria in Minn. R. 7850.4100, and the other requirements of this route permit; and for highways under the jurisdiction of the Minnesota Department of Transportation (MnDOT), the procedures for accommodating utilities in trunk highway rights-of-way.

5 GENERAL CONDITIONS

The Permittees shall comply with the following conditions during construction and operation of the Transmission Facility over the life of this route permit. The Permittees may, but are not required, to submit any compliance filings required under this route permit immediately after the Commission's oral decision regarding the route permit and prior to the Commission's written decision.

5.1 Route Permit Distribution

Within 30 days of issuance of this route permit, the Permittees shall provide all affected landowners with a copy of this route permit and the complaint procedures. An affected landowner is any landowner or designee that is within or adjacent to the Designated Route. In no case shall a landowner receive this route permit and complaint procedures less than five days prior to the start of construction on their property. The Permittees shall also provide a copy of this route permit and the complaint procedures to the applicable regional development

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commissions, county environmental offices, and city and township clerks. The Permittees shall file with the Commission an affidavit of its route permit and complaint procedures distribution within 30 days of issuance of this route permit.

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5.2 Access to Property

The Permittees shall notify landowners prior to entering or conducting maintenance within their property, unless otherwise negotiated with the landowner. The Permittees shall keep records of compliance with this section and provide them upon the request of the Minnesota Department of Commerce (Department of Commerce) staff or Commission staff.

5.3 Construction and Operation Practices

The Permittees shall comply with the construction practices, operation and maintenance practices, and material specifications described in the permitting record for this Transmission Facility unless this route permit establishes a different requirement in which case this route permit shall prevail.

5.3.1 Field Representative

The Permittees shall designate a field representative responsible for overseeing compliance with the conditions of this route permit during construction of the Transmission Facility. This person shall be accessible by telephone or other means during normal business hours throughout site preparation, construction, cleanup, and restoration.

The Permittees shall file with the Commission the name, address, email, phone number, and emergency phone number (if different) of the field representative at least 14 days prior to the pre-construction meeting. The Permittees shall provide the field representative's contact information to affected landowners, local government units and other interested persons at least 14 days prior to the pre-construction meeting. The Permittees need to only provide the field representative's contact information to those landowners that are the subject of the Permittees' vegetation clearing or plan and profile submission and additional landowners may be notified separately when the Permittees are ready to proceed with a vegetation clearing or plan and profile filing for other Transmission Facility areas. The Permittees may change the field representative at any time upon notice to the Commission, affected landowners, local government units and other interested persons. The Permittees shall file with the Commission an affidavit of distribution of its field representative's contact information at least five days prior to the pre-construction meeting and upon changes to the field representative.

5.3.2 Employee Training - Route Permit Terms and Conditions

The Permittees shall train all employees, contractors, and other persons involved in the Transmission Facility construction regarding the terms and conditions of this route permit. The Permittees shall keep records of compliance with this section and provide them upon the request of Department of Commerce staff or Commission staff.

5.3.3 Independent Third-Party Monitoring

Prior to construction, the Permittees shall propose a scope of work and identify an independent third-party monitor to conduct construction monitoring on behalf of the Department of Commerce. The scope of work shall be developed in consultation with and approved by the Department of Commerce. This third-party monitor will report directly to and will be under the control of the Department of Commerce with costs borne by the Permittees. Department of Commerce staff shall keep records of compliance with this section and will ensure that status reports detailing the construction monitoring are filed with the Commission in accordance with scope of work approved by the Department of Commerce.

5.3.4 Public Services, Public Utilities, and Existing Easements

During Transmission Facility construction, the Permittees shall minimize any disruption to public services or public utilities. To the extent disruptions to public services or public utilities occur these shall be temporary, and the Permittees shall restore service promptly. Where any impacts to utilities have the potential to occur the Permittees shall work with both landowners and local entities to determine the most appropriate mitigation measures if not already considered as part of this route permit.

The Permittees shall cooperate with county and city road authorities to develop appropriate signage and traffic management during construction. The Permittees shall keep records of compliance with this section and provide them upon the request of Department of Commerce staff or Commission staff.

5.3.5 Temporary Workspace

The Permittees shall limit temporary easements to special construction access needs and additional staging or lay-down areas required outside of the authorized right-of-way. Temporary space shall be selected to limit the removal and impacts to vegetation. The Permittees shall obtain temporary easements outside of the authorized transmission line right-of-way from affected landowners through rental agreements. Temporary easements are not provided for in this route permit.

The Permittees may construct temporary driveways between the roadway and the structures to minimize impact using the shortest route feasible. The Permittees shall use construction mats to minimize impacts on access paths and construction areas. The Permittees shall submit the location of temporary workspaces and driveways with the plan and profile pursuant to Section 9.1.

5.3.6 Noise

The Permittees shall comply with noise standards established under Minn. R. 7030.0010 to 7030.0080. The Permittees shall limit construction and maintenance activities to daytime working hours to the extent practicable.

5.3.7 Aesthetics

The Permittees shall consider input pertaining to visual impacts from landowners or land management agencies prior to final location of structures, rights-of-way, and other areas with the potential for visual disturbance. The Permittees shall use care to preserve the natural landscape, minimize tree removal and prevent any unnecessary destruction of the natural surroundings in the vicinity of the Transmission Facility during construction and maintenance. The Permittees shall work with landowners to locate the high-voltage transmission line to minimize the loss of agricultural land, forest, and wetlands, and to avoid homes and farmsteads. The Permittees shall place structures at a distance, consistent with sound engineering principles and system reliability criteria, from intersecting roads, highways, or trail crossings.

5.3.8 Soil Erosion and Sediment Control

The Permittees shall implement those erosion prevention and sediment control practices recommended by the Minnesota Pollution Control Agency (MPCA) Construction Stormwater Program. If construction of the Transmission Facility disturbs more than one acre of land or is sited in an area designated by the MPCA as having potential for impacts to water resources, the Permittees shall obtain a National Pollutant Discharge Elimination System/State Disposal System Construction Stormwater Permit from the MPCA that provides for the development of a Stormwater Pollution Prevention Plan that describes methods to control erosion and runoff.

The Permittees shall implement reasonable measures to minimize erosion and sedimentation during construction and shall employ perimeter sediment controls, protect exposed soil by promptly planting, seeding, using erosion control blankets and turf reinforcement mats, stabilizing slopes, protecting storm drain inlets, protecting soil stockpiles, and controlling vehicle tracking. Contours shall be graded as required so that all surfaces provide for proper drainage, blend with the natural terrain, and are left in a condition that will facilitate re-vegetation and prevent erosion. All areas disturbed during construction of the Transmission Facility shall be returned to pre-construction conditions.

5.3.9 Wetlands and Water Resources

The Permittees shall develop wetland impact avoidance measures and implement them during construction of the Transmission Facility. Measures shall include spacing and placing the power poles at variable distances to span and avoid wetlands, watercourses, and floodplains. Unavoidable wetland impacts as a result of the placement of poles shall be limited to the immediate area around the poles. To minimize impacts, the Permittees shall construct in wetland areas during frozen ground conditions where practicable and according to permit requirements by the applicable permitting authority. When construction during winter is not possible, the Permittees shall use wooden or composite mats to protect wetland vegetation.

The Permittees shall contain soil excavated from the wetlands and riparian areas and not place it back into the wetland or riparian area. The Permittees shall access wetlands and riparian areas using the shortest route possible in order to minimize travel through wetland areas and prevent unnecessary impacts. The Permittees shall not place staging or stringing set up areas within or adjacent to wetlands or water resources, as practicable. The Permittees shall assemble power pole structures on upland areas before they are brought to the site for installation.

The Permittees shall restore wetland and water resource areas disturbed by construction activities to pre-construction conditions in accordance with the requirements of applicable state and federal permits or laws and landowner agreements. The Permittees shall meet the USACE, Minnesota Department of Natural Resources (DNR), Minnesota Board of Water and Soil Resources, and local units of government wetland and water resource requirements.

5.3.10 Vegetation Management

The Permittees shall minimize the number of trees to be removed in selecting the right-of-way specifically preserving to the maximum extent practicable windbreaks, shelterbelts, living snow fences, and vegetation in areas such as trail and stream crossings where vegetative screening may minimize aesthetic impacts, to the extent that such action do not violate sound engineering principles or system reliability criteria.

The Permittees shall remove tall growing species located within the transmission line right-of-way that endanger the safe and reliable operation of the transmission line. The Permittees shall leave undisturbed, to the extent possible, existing low growing species in the right-of-way or replant such species in the right-of-way to blend the difference between the right-of-way and adjacent areas, to the extent that the low growing vegetation will not pose a threat to the transmission line or impede construction.

5.3.11 Application of Pesticides

The Permittees shall restrict pesticide use to those pesticides and methods of application approved by the Minnesota Department of Agriculture (MDA), DNR, and the U.S. Environmental Protection Agency (EPA). Selective foliage or basal application shall be used when practicable. All pesticides shall be applied in a safe and cautious manner so as not to damage adjacent properties including crops, orchards, tree farms, apiaries, or gardens. The Permittees shall contact the landowner at least 14 days prior to pesticide application on their property. The Permittees may not apply any pesticide if the landowner requests that there be no application of pesticides within the landowner's property. The Permittees shall provide notice of pesticide application to landowners and beekeepers operating Minnesota Department of Agriculture registered apiaries within three miles of the pesticide application area at least 14 days prior to such application. The Permittees shall use the Minnesota Department of Agriculture's Apiary Registry (<https://mn.beecheck.org/map>) to identify apiaries for purposes of compliance with this condition. The Permittees shall keep pesticide communication and application records and provide them upon the request of Department of Commerce staff or Commission staff.

5.3.12 Invasive Species

The Permittees shall employ best management practices to avoid the potential introduction and spread of invasive species on lands disturbed by Transmission Facility construction activities. The Permittees shall develop an Invasive Species Prevention Plan and file it with the Commission at least 14 days prior to the pre-construction meeting. The Permittees shall comply with the most recently filed Invasive Species Prevention Plan.

5.3.13 Noxious Weeds

The Permittees shall take all reasonable precautions against the spread of noxious weeds during all phases of construction. When utilizing seed to establish temporary and permanent vegetative cover on exposed soil the Permittees shall select site appropriate seed certified to be free of noxious weeds. To the extent possible, the Permittees shall use native seed mixes. The Permittees shall keep records of compliance with this section and provide them upon the request of Department of Commerce staff or Commission staff.

5.3.14 Roads

The Permittees shall advise the appropriate governing bodies having jurisdiction over all state, county, city, or township roads that will be used during the construction phase of the Transmission Facility. Where practical, existing roadways shall be used for all activities associated with construction of the Transmission Facility. Oversize or overweight loads associated with the Transmission Facility shall not be hauled across public roads without required permits and approvals.

The Permittees shall construct the fewest number of site access roads required. Access roads shall not be constructed across streams and drainage ways without the required permits and approvals. Access roads shall be constructed in accordance with all necessary township, county or state road requirements and permits.

The Permittees shall promptly repair private roads or lanes damaged when moving equipment or when accessing construction workspace, unless otherwise negotiated with the affected landowner.

5.3.15 Archaeological and Historic Resources

The Permittees shall make every effort to avoid impacts to archaeological and historic resources when constructing the Transmission Facility. In the event that a resource is encountered, the Permittees shall consult with the State Historic Preservation Office and the State Archaeologist. Where feasible, avoidance of the resource is required. Where not feasible, mitigation must include an effort to minimize Transmission Facility impacts on the resource consistent with State Historic Preservation Office and State Archaeologist requirements.

Prior to construction, the Permittees shall train workers about the need to avoid cultural properties, how to identify cultural properties, and procedures to follow if undocumented cultural properties, including gravesites, are found during construction. If human remains are encountered during construction, the Permittees shall immediately halt construction and promptly notify local law enforcement and the State Archaeologist. The Permittees shall not resume construction at such location until authorized by local law enforcement or the State Archaeologist. The Permittees shall keep records of compliance with this section and provide them upon the request of Department of Commerce staff or Commission staff.

5.3.16 Avian Protection

The Permittees in cooperation with the DNR shall identify areas of the transmission line where bird flight diverters will be incorporated into the transmission line design to prevent large avian collisions attributed to visibility issues. Standard transmission design shall incorporate adequate spacing of conductors and grounding devices in accordance with Avian Power Line Interaction Committee standards to eliminate the risk of electrocution to raptors with larger wingspans that may simultaneously come in contact with a conductor and grounding devices. The Permittees shall submit documentation of its avian protection coordination with the plan and profile pursuant to Section 9.2.

5.3.17 Drainage Tiles

The Permittees shall avoid, promptly repair, or replace all drainage tiles broken or damaged during all phases of the Transmission Facility's life unless otherwise negotiated with the

affected landowner. The Permittees shall keep records of compliance with this section and provide them upon the request of Department of Commerce staff or Commission staff.

5.3.18 Restoration

The Permittees shall restore the right-of-way, temporary workspaces, access roads, abandoned right-of-way, and other public or private lands affected by construction of the Transmission Facility. Restoration within the right-of-way must be compatible with the safe operation, maintenance, and inspection of the transmission line. Within 60 days after completion of all restoration activities, the Permittees shall file with the Commission a Notice of Restoration Completion.

5.3.19 Cleanup

The Permittees shall remove and properly dispose of all construction waste and scrap from the right-of-way and all premises on which construction activities were conducted upon completion of each task. The Permittees shall remove and properly dispose of all personal litter, including bottles, cans, and paper from construction activities daily.

5.3.20 Pollution and Hazardous Wastes

The Permittees shall take all appropriate precautions to protect against pollution of the environment. The Permittees shall be responsible for compliance with all laws applicable to the generation, storage, transportation, clean up and disposal of all waste generated during construction and restoration of the Transmission Facility.

5.3.21 Damages

The Permittees shall fairly restore or compensate landowners for damage to crops, fences, private roads and lanes, landscaping, drain tile, or other damages sustained during construction. The Permittees shall keep records of compliance with this section that includes the date the Permittees were notified of the damages and when the restoration or compensation was completed and provide them upon the request of Department of Commerce staff or Commission staff.

5.4 Electrical Performance Standards

5.4.1 Grounding

The Permittees shall design, construct, and operate the transmission line in a manner so that the maximum induced steady-state short-circuit current shall be limited to five milliamperes root mean square (rms) alternating current between the ground and any non-stationary object within the right-of-way, including but not limited to large motor vehicles and agricultural

equipment. All fixed metallic objects on or off the right-of-way, except electric fences that parallel or cross the right-of-way, shall be grounded to the extent necessary to limit the induced short-circuit current between ground and the object so as not to exceed one milliampere rms under steady state conditions of the transmission line and to comply with the ground fault conditions specified in the National Electric Safety Code. The Permittees shall address and rectify any induced current problems that arise during transmission line operation.

5.4.2 Electric Field

The Permittees shall design, construct, and operate the transmission line in such a manner that the electric field measured one meter above ground level immediately below the transmission line shall not exceed 8.0 kV/m rms.

5.4.3 Interference with Communication Devices

If interference with radio or television, satellite, wireless internet, GPS-based agriculture navigation systems or other communication devices is caused by the presence or operation of the Transmission Facility, the Permittees shall take whatever action is necessary to restore or provide reception equivalent to reception levels in the immediate area just prior to the construction of the Transmission Facility. The Permittees shall keep records of compliance with this section and provide them upon the request of Department of Commerce staff or Commission staff.

5.5 Other Requirements

5.5.1 Safety Codes and Design Requirements

The Permittees shall design the transmission line and associated facilities to meet or exceed all relevant local and state codes, the National Electric Safety Code, and North American Electric Reliability Corporation requirements. This includes standards relating to clearances to ground, clearance to crossing utilities, clearance to buildings, strength of materials, clearances over roadways, right-of-way widths, and permit requirements.

5.5.2 Other Permits and Regulations

The Permittees shall comply with all applicable state statutes and rules. The Permittees shall obtain all required permits for the Transmission Facility and comply with the conditions of those permits unless those permits conflict with or are preempted by federal or state permits and regulations.

At least 14 days prior to the pre-construction meeting, the Permittees shall file with the Commission an Other Permits and Regulations Submittal that contains a detailed status of all permits, authorizations, and approvals that have been applied for specific to the Transmission

Facility. The Other Permits and Regulations Submittal shall also include the permitting agency name; the name of the permit, authorization, or approval being sought; contact person and contact information for the permitting agency or authority; brief description of why the permit, authorization, or approval is needed; application submittal date; and the date the permit, authorization, or approval was issued or is anticipated to be issued.

The Permittees shall demonstrate that it has obtained necessary permits, authorizations, and approvals by filing an affidavit stating as such and an updated Other Permits and Regulations Submittal prior to commencing construction. The Permittees shall provide a copy of any such permits, authorizations, and approvals at the request of Department of Commerce staff or Commission staff.

6 SPECIAL CONDITIONS

The special conditions shall take precedence over other conditions of this permit should there be a conflict.

6.1 Vegetation Management Plan

The Permittees filed with their Application a vegetation management plan (VMP) for review and comment by all interested persons, including EERA and the MnDNR. The Permittees shall revise the VMP to include the following revisions identified by EERA and the MnDNR during this proceeding:

- Avoidance plans should be incorporated into the VMP as appropriate.
- Any conditions related to vegetation management associated with any permits issued by a state or federal agency for the Permitted Route that have been identified as of the date the VMP is filed with the Commission prior to commencing Project vegetation clearing or construction, with the understanding that the VMP shall also include a condition that any additional vegetation management conditions necessary for compliance with any state or federal permit issued for the Project not explicitly identified in the VMP at the time of filing will be incorporated by reference

[to date, no comments have been received]

The Permittees shall file the VMP with these revisions incorporated with the Commission, as applicable, with the plan for vegetation clearing under Section 6.1.6 required under this permit or with the plan and profile required under Section 9.2 of this permit. The Permittees shall provide all landowners along the route with copies of the VMP and an electronic copy (including by website address) shall be sufficient. The Permittees shall file an affidavit of its distribution of the VMP to landowners with the Commission no later than, as applicable, with the filing of plan for vegetation clearing or the compliance filing required under Section 5.3.1 of this Permit. Such notice to landowners may be provided for only those portions of the Project that are the subject of the plan for vegetation clearing for each phase of the Project.

6.2 Agricultural Impact Mitigation Plan

The Permittee developed an agricultural impact mitigation plan (AIMP) in coordination with the MDA that includes all revisions requested by the MDA. The Permittees shall provide all affected landowners with a copy of the plan.

6.3 Dust Control

The Permittees shall utilize non-chloride products for dust control during construction.

6.4 Wildlife-Friendly Erosion Control

The Permittees shall use only “bio-netting” or “natural netting” types and mulch products without synthetic (plastic) fiber additives.

6.5 Project Lighting

The Permittees must use shielded and downward facing lighting and LED lighting that minimizes blue hue for all new project substation and compensation station facilities. Downward facing lighting must be clearly visible on the plan and profile(s) submitted for the project.

6.6 Vegetation Clearing Before Construction

If the Permittees will clear vegetation for any portion of the Transmission Facility prior to completion of the design necessary to provide a plan and profile contemplated under Section 9, the Permittees shall file with the Commission at least 14 days prior to such vegetation clearing activities:

- The Vegetation Management Plan contemplated under Section 6.1 of this Route Permit that is applicable to any portion of the Transmission Facility being proposed for vegetation clearing;
- A map showing the area proposed for vegetation removal and its location within the Designated Route and compared to the right-of-way identified in this route permit;
- A statement of confirmation that the Permittees have obtained, or will obtain before commencing, necessary land rights and agency permits for the vegetation removal in this area;
- The Permittees’ plan for notification of Field Representative for landowners in the identified area; and
- If the Permittees have made any modifications to the right-of-way or alignment within the Designated Route from that identified in this route permit, the Permittee shall demonstrate that the right-of-way to be cleared of vegetation will be located so as to have comparable overall impacts relative to the factors in

Minn. R. 7850.4100, as does the right-of-way and alignment identified in this route permit.

6.7 Substation Construction

Notwithstanding any other requirement in this Permit, Permittees may commence construction of the substations identified in Section 2.3 of this Permit, provided that Permittees comply, as applicable, with Sections 9.1 and 9.2 of this Permit with respect to the specific scope of the construction activities sought to be conducted by Permittees.

7 DELAY IN CONSTRUCTION

If the Permittees has not commenced construction or improvement of the route within four years after the date of issuance of this route permit the Permittees shall file a Failure to Construct Report and the Commission shall consider suspension of this route permit in accordance with Minn. R. 7850.4700.

8 COMPLAINT PROCEDURES

At least 14 days prior to the pre-construction meeting, the Permittees shall file with the Commission the complaint procedures that will be used to receive and respond to complaints. The complaint procedures shall be in accordance with the requirements of Minn. R. 7829.1500 or Minn. R. 7829.1700, and as set forth in the complaint procedures attached to this route permit.

Upon request, the Permittees shall assist Department of Commerce staff or Commission staff with the disposition of unresolved or longstanding complaints. This assistance shall include, but is not limited to, the submittal of complaint correspondence and complaint resolution efforts.

9 COMPLIANCE REQUIREMENTS

Failure to timely and properly make compliance filings required by this route permit is a failure to comply with the conditions of this route permit. Compliance filings must be electronically filed with the Commission.

9.1 Pre-Construction Meeting

Prior to the start of construction, the Permittees shall participate in a pre-construction meeting with Department of Commerce and Commission staff to review pre-construction filing requirements, scheduling, and to coordinate monitoring of construction and site restoration activities. Because the Project may be constructed in segments, multiple pre-construction

meetings and submissions under Section 9.2 are allowed. Within 14 days following the pre-construction meeting, the Permittees shall file with the Commission a summary of the topics reviewed and discussed and a list of attendees. The Permittees shall indicate in the filing the anticipated construction start date.

9.2 Plan and Profile

At least 14 days prior to the pre-construction meeting, the Permittees shall file with the Commission, and provide the Department of Commerce, and the counties where the Transmission Facility, or portion of the Transmission Facility, will be constructed with a plan and profile of the right-of-way and the specifications and drawings for right-of-way preparation, construction, structure specifications and locations, cleanup, and restoration for the Transmission Facility. The documentation shall include maps depicting the plan and profile including the right-of-way, alignment, and structures in relation to the route and alignment approved per this route permit.

The Permittees may not commence construction until the earlier of (i) 30 days after the pre-construction meeting or (ii) or until the Commission staff has notified the Permittees in writing that it has completed its review of the documents and determined that the planned construction is consistent with this route permit.

If the Commission notifies the Permittees in writing within 30 days after the pre-construction meeting that it has completed its review of the documents and planned construction, and finds that the planned construction is not consistent with this route permit, the Permittees may submit additional and/or revised documentation and may not commence construction until the Commission has notified the Permittees in writing that it has determined that the planned construction is consistent with this route permit.

If the Permittees intends to make any significant changes in its plan and profile or the specifications and drawings after submission to the Commission, the Permittees shall notify the Commission, the Department of Commerce, and county staff at least five days before implementing the changes. No changes shall be made that would be in violation of any of the terms of this route permit.

9.3 Status Reports

The Permittees shall file with the Commission monthly Construction Status Reports beginning with the pre-construction meeting and until completion of restoration. Construction Status Reports shall describe construction activities and progress, activities undertaken in compliance with this route permit, and shall include text and photographs.

If the Permittees does not commence construction of the Transmission Facility within six months of this route permit issuance, the Permittees shall file with the Commission Pre-

Construction Status Reports on the anticipated timing of construction every six months beginning with the issuance of this route permit until the pre-construction meeting.

9.4 In-Service Date

At least three days before the Transmission Facility is to be placed into service, the Permittees shall notify the Commission of the date on which the Transmission Facility will be placed into service and the date on which construction was completed.

9.5 As-Builts

Within 90 days after completion of construction, the Permittees shall submit to the Commission copies of all final as-built plans and specifications developed during the Transmission Facility construction.

9.6 GPS Data

Within 90 days after completion of construction, the Permittees shall submit to the Commission, in the format requested by the Commission, geo-spatial information (*e.g.*, ArcGIS compatible map files, GPS coordinates, associated database of characteristics) for all structures associated with the Transmission Facility and each substation connected.

9.7 Right of Entry

The Permittees shall allow Commission designated representatives to perform the following, upon reasonable notice, upon presentation of credentials and at all times in compliance with the Permittees' site safety standards:

- (a) To enter upon the facilities easement of the property for the purpose of obtaining information, examining records, and conducting surveys or investigations.
- (b) To bring such equipment upon the facilities easement of the property as is necessary to conduct such surveys and investigations.
- (c) To sample and monitor upon the facilities easement of the property.
To examine and copy any documents pertaining to compliance with the conditions of this route permit.

10 ROUTE PERMIT AMENDMENT

This route permit may be amended at any time by the Commission. Any person may request an amendment of the conditions of this route permit by submitting a request to the Commission in writing describing the amendment sought and the reasons for the amendment. The Commission will mail notice of receipt of the request to the Permittees. The Commission may amend the conditions after affording the Permittees and interested persons such process as is

required under Minn. R. 7850.4900.

11 TRANSFER OF ROUTE PERMIT

The Permittees may request at any time that the Commission transfer this route permit to another person or entity (transferee). In its request, the Permittees must provide the Commission with:

- (a) the name and description of the transferee;
- (b) the reasons for the transfer;
- (c) a description of the facilities affected; and
- (d) the proposed effective date of the transfer.

The transferee must provide the Commission with a certification that it has read, understands and is able to comply with the plans and procedures filed for the Transmission Facility and all conditions of this route permit. The Commission may authorize transfer of the route permit after affording the Permittees, the transferee, and interested persons such process as is required under Minn. R. 7850.5000.

12 REVOCATION OR SUSPENSION OF ROUTE PERMIT

The Commission may initiate action to revoke or suspend this route permit at any time. The Commission shall act in accordance with the requirements of Minn. R. 7850.5100, to revoke or suspend this route permit.

STATE OF MINNESOTA PUBLIC UTILITIES COMMISSION

ROUTE PERMIT FOR THE
NORTHLAND RELIABILITY PROJECT

A HIGH-VOLTAGE TRANSMISSION LINE AND ASSOCIATED

FACILITIES IN
AITKIN, BENTON, ~~CASS~~, CROW WING, ITASCA, MORRISON, AND SHERBURNE
COUNTIES

ISSUED TO
MINNESOTA POWER AND GREAT RIVER ENERGY

PUC DOCKET NO. ~~[Docket Number]~~ [22-415](#)

In accordance with the requirements of Minnesota Statutes Chapter 216E and Minnesota Rules Chapter 7850 this route permit is hereby issued to:

MINNESOTA POWER AND GREAT RIVER ENERGY

Minnesota Power and Greater River Energy are authorized by this route permit to construct and operate ~~a~~ [an approximately](#) 180-mile 345 kV double-circuit transmission line in Aitkin, Benton, ~~Cass~~, Crow Wing, Itasca, Morrison, and Sherburne Counties, Minnesota.

The high-voltage transmission line shall be constructed within the route identified in this route permit and in compliance with the conditions specified in this route permit.

Approved and adopted this ____ day of _____, 2024

BY ORDER OF THE COMMISSION

Will Seuffert,
Executive Secretary

To request this document in another format such as large print or audio, call 651-296-0406 or 800-657-3782 (voice). Persons with a hearing or speech impairment may call using their preferred Telecommunications Relay Service or email consumer.puc@state.mn.us for assistance.

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ATTACHMENTS

Attachment 1 – Complaint Handling Procedures for Permitted Energy Facilities

Attachment 2 – Compliance Filing Procedures for Permitted Energy Facilities

Attachment 3 – Route Permit Maps

1 ROUTE PERMIT

The Minnesota Public Utilities Commission (Commission) hereby issues this route permit to Minnesota Power and Great River Energy (Permittees) pursuant to Minnesota Statutes Chapter 216E and Minnesota Rules Chapter 7850. This route permit authorizes the Permittees to construct and operate an approximately 180-mile double-circuit 345 kV transmission line and associated facilities in Aitkin, Benton, ~~Cass~~, Crow Wing, Itasca, Morrison, and Sherburne Counties, Minnesota (Northland Reliability Project, henceforth known as Transmission Facility or Project). The high-voltage transmission line shall be constructed within the route identified in this route permit and in compliance with the conditions specified in this route permit.

1.1 Pre-emption

Pursuant to Minn. Stat. § 216E.10, this route permit shall be the sole route approval required for construction of the transmission facilities and this route permit shall supersede and preempt all zoning, building, or land use rules, regulations, or ordinances promulgated by regional, county, local and special purpose governments.

2 TRANSMISSION FACILITY DESCRIPTION

Minnesota Power and Great River Energy will construct and co-own an approximately 180-mile 345 kV double-circuit transmission lines ~~Benton County~~ between line that consists of two segments:

~~the~~ 1) Segment 1: construction of a new, approximately 140-mile long, double-circuit 345 kilovolt ("kV") transmission line connecting the expanded Iron Range Substation, ~~the~~ a new Cuyuna Series Compensation Station (described below), and the ~~Benton County~~ new Cherry Park Substation. ~~Great River Energy will own the Benton County Substation expansion and the two transmission lines to be replaced between the Benton County Substation and the Big Oaks and Sherco substations.; and~~

2) Segment 2: replacement of two existing high-voltage transmission lines.

a) Replace an approximately 20-mile 230 kV line with two 345 kV circuits from the Cherry Park Substation to the new Xcel Energy Big Oaks Substation along existing high-voltage transmission right-of-way on double-circuit 345 kV structures; and

b) Replace an approximately 20-mile 345 kV line from the Cherry Park Substation to the existing Xcel Energy Sherco Substation in Sherburne County along existing high-voltage transmission right-of-way using double-circuit 345 kV structures.

The Transmission Facility is located in the following: [to be completed after designation of route by Commission]

Northland Reliability Project, PUC Docket No. E015, ET2/CN-22-416 and E002, E015, ET2/TL-22-415

| County | Township Name | Township | Range | Section |
|-----------|---------------|----------|-------|---------|
| Aitkin | | | | |
| Benton | | | | |
| Cass | | | | |
| Crow Wing | | | | |
| Itasca | | | | |
| Morrison | | | | |
| Sherburne | | | | |

2.1 Structures

Northland Reliability Project, PUC Docket No. E015, ET2/CN-22-416 and E002, E015, ET2/TL-22-415

The transmission line will primarily consist of double-circuit, tubular steel monopole structures with V-string insulators. These structures will be approximately 130 to 170 feet above ground and spaced 800 to 1,000 feet apart depending upon the terrain and environmental constraints. The average diameter of the ~~monopoles~~ monopole foundations will be 7 to 10 ~~inches~~ specialty-
having feet, with specialty structures, including double pole structures, having wider
foundation diameters. The diameter of each monopole will be narrower than the diameter of
each foundation.

Portions of the ~~project in Sherburne~~ Transmission Facility in Sherburne County will ~~consists~~ consist of triple-circuit, tubular steel monopole structures with a 69 kV underbuild position to accommodate an existing 69-kV transmission line. These monopoles will include V-string and I-string insulators for the 345 kV and 69 kV conductors, respectively. Structures will be approximately 140 to 180 feet above ground and spaced 600 to 800 apart.

Where ~~the~~ existing transmission lines will be realigned, relocated, reconfigured, or replaced, the structure types will include, but are not limited to, typical wood or steel monopole or H-frame structures. These structures will be approximately 60 to 180 feet above ground and spaced 300 feet to 1,000 feet apart, depending on the structure type used.

2.2 Conductors

The Permittees will use two different conductor types for the project: a ~~horizontally~~ bundled twisted pair-type aluminum conductor steel reinforced (T2-ACSR) or similar type and a ~~horizontally~~ bundled aluminum conductor steel supported (ACSS) or similar type.

The table below details specifics on the various structure and conductor types as presented in the route permit application.

| Line Type | Conductor ^[3] | Structure | | Foundation | Approx. Height (feet) | Approx. Span (feet) |
|--|--------------------------|-----------|----------|--------------------------------|-----------------------|---------------------|
| | | Type | Material | | | |
| Double-Circuit 345/345 kV | T2-ACSR or ACSS | Monopole | Steel | Concrete Pier | 130-170 | 800-1,000 |
| Single-Circuit 230 kV | T2-ACSR or ACSS | H-frame | Wood | Direct Embed ^[1] | 65-90 | 700-900 |
| Single-Circuit 115 kV | T2-ACSR or ACSS | H-frame | Wood | Direct Embed | 60-80 | 600-800 |
| Single-Circuit 69 kV Rebuild ^[2] | T2-ACSR or ACSS | Monopole | Wood | Direct Embed | 60-80 | 300-500 |
| Triple-Circuit 345/345/69 kV | T2-ACSR or ACSS | Monopole | Steel | Concrete Pier | 140-180 | 600-800 |

Note: The values in the table are typical values expected for the majority of tangent structures based on similar facilities. Actual values may vary.

[1] Certain specialty or storm structures may be necessary. These structures may be concrete pier foundations instead of

direct embed.

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Northland Reliability Project, PUC Docket No. E015, ET2/CN-22-416 and E002, E015, ET2/TL-22-415

- [2] Single-circuit 69 kV transmission line, and associated switch structures, will be replaced in Sherburne County for the Great River Energy's existing 69 kV transmission line (EW Line) from West Becker Switch and West End Substation, where the FWEW Line will be built to 115 kV capable. There is approximately 1,345 feet of single-circuit 69 kV replacement to 115 kV capable within the uncrossing area between the Benton County Cherry Park Substation to Big Oaks Substation line (also known to as the MR Line) and the Benton County Cherry Park Substation to Sherco Substation line (also known as the GRE-BS Line). GRE's 69 kV EW Line easement width varies from 70 to 100 feet in width.
- [3] T2-ACSR = horizontally bundled twisted pair-type aluminum conductor steel reinforced type conductor. ACSS = a horizontally bundled aluminum conductor steel supported type conductor.

2.3 Substations and Associated Facilities

The project will involve expansion and/or construction of the following ~~improvements to the power grid~~ substations:

- Expansion of the existing Iron Range Substation, located near Grand Rapids, ~~expansion~~ :
- Expansion of the existing Benton County Substation, located near St. Cloud, ~~and rerouting existing transmission lines at the Iron Range and Benton County substations~~ (to be called the Cherry Park Substation);
- Construction of a new Cuyuna Series Compensation Station near the existing Riverton Substation ~~and rerouting an existing transmission line in the Riverton area.~~

3 DESIGNATED ROUTE

The route designated by the Commission is depicted on the route maps attached to this route permit (Designated Route). The Designated Route is generally described as follows:

[To be completed after designation of route by Commission]

~~[Provide detailed description of the authorized route including the route widths and any other specifics relevant to each segment. Also include a reference to the relevant route map to be attached to the route permit.]~~

The ~~Designated~~ Designated Route includes an anticipated alignment and a right-of-way. The right-of-way is the physical land needed for the safe operation of the transmission line. The Permittees shall locate the alignment and associated right-of-way within the Designated Route unless otherwise authorized by this route permit or the Commission. The Designated Route provides the Permittees with flexibility for minor adjustments of the alignment and right-of-way to accommodate landowner requests and unforeseen conditions.

Any modifications to the Designated Route or modifications that would result in right-of-way placement outside the Designated Route shall be specifically reviewed by the Commission in accordance with Minn. R. 7850.4900 and Section 10 of this route permit.

4 RIGHT-OF-WAY

This route permit authorizes the Permittees to obtain a new permanent right-of-way for the transmission ~~line up to [number]~~ lines authorized by this Route Permit of approximately 150 feet in width for each line. The permanent right-of-way is typically ~~[number]~~ 75 feet on both sides of the transmission line measured from its centerline or alignment. Some areas of the Transmission Facility may require wider rights-of-way based on actual design conditions.

The anticipated alignment is intended to minimize potential impacts relative to the criteria identified in Minn. R. 7850.4100. The final alignment must generally conform to the anticipated alignment identified on the route maps unless changes are requested by individual landowners and agreed to by the Permittees or for unforeseen conditions that are encountered or as otherwise provided for by this route permit.

Any right-of-way or alignment modifications within the Designated Route shall be located so as to have comparable overall impacts relative to the factors in Minn. R. 7850.4100, as does the right-of-way and alignment identified in this route permit, and shall be specifically identified and documented in and approved as part of the plan and profile submitted pursuant to ~~Section~~ Section 9.2 9.1 of this route permit.

Where the transmission line parallels existing highway and other road rights-of-way, the transmission line right-of-way shall occupy and utilize the existing right-of-way to the maximum extent possible; consistent with the criteria in Minn. R. 7850.4100, and the other requirements of this route permit; and for highways under the jurisdiction of the Minnesota Department of Transportation (MnDOT), the procedures for accommodating utilities in trunk highway rights-of-way.

5 GENERAL CONDITIONS

The Permittees shall comply with the following conditions during construction and operation of the Transmission Facility over the life of this route permit. The Permittees may, but are not required, to submit any compliance filings required under this route permit immediately after the Commission's oral decision regarding the route permit and prior to the Commission's written decision.

5.1 Route Permit Distribution

Within 30 days of issuance of this route permit, the Permittees shall provide all affected landowners with a copy of this route permit and the complaint procedures. An affected landowner is any landowner or designee that is within or adjacent to the Designated Route. In no case shall a landowner receive this route permit and complaint procedures less than five

Northland Reliability Project, PUC Docket No. E015, ET2/CN-22-416 and E002, E015, ET2/TL-22-415

days prior to the start of construction on their property. The Permittees shall also provide a copy of this route permit and the complaint procedures to the applicable regional development commissions, county environmental offices, and city and township clerks. The Permittees shall file with the Commission an affidavit of its route permit and complaint procedures distribution within 30 days of issuance of this route permit.

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5.2 Access to Property

The Permittees shall notify landowners prior to entering or conducting maintenance within their property, unless otherwise negotiated with the landowner. The Permittees shall keep records of compliance with this section and provide them upon the request of the Minnesota Department of Commerce (Department of Commerce) staff or Commission staff.

5.3 Construction and Operation Practices

The Permittees shall comply with the construction practices, operation and maintenance practices, and material specifications described in the permitting record for this Transmission Facility unless this route permit establishes a different requirement in which case this route permit shall prevail.

5.3.1 Field Representative

The Permittees shall designate a field representative responsible for overseeing compliance with the conditions of this route permit during construction of the Transmission Facility. This person shall be accessible by telephone or other means during normal business hours throughout site preparation, construction, cleanup, and restoration.

The Permittees shall file with the Commission the name, address, email, phone number, and emergency phone number (if different) of the field representative at least 14 days prior to the pre- construction meeting. The Permittees shall provide the field representative's contact information to affected landowners, local government units and other interested persons at least 14 days prior to the pre-construction meeting. The Permittees need to only provide the field representative's contact information to those landowners that are the subject of the Permittees' vegetation clearing or plan and profile submission and additional landowners may be notified separately when the Permittees are ready to proceed with a vegetation clearing or plan and profile filing for other Transmission Facility areas. The Permittees may change the field representative at any time upon notice to the Commission, affected landowners, local government units and other interested persons. The Permittees shall file with the Commission an affidavit of distribution of its field representative's contact information at least ~~14~~five days prior to the pre-construction meeting and upon changes to the field representative.

5.3.2 Employee Training - Route Permit Terms and Conditions

The Permittees shall train all employees, contractors, and other persons involved in the Transmission Facility construction regarding the terms and conditions of this route permit. The Permittees shall keep records of compliance with this section and provide them upon the request of Department of Commerce staff or Commission staff.

5.3.3 Independent Third-Party Monitoring

Prior to ~~any~~ construction, the Permittees shall propose a scope of work and identify an independent third-party monitor to conduct construction monitoring on behalf of the Department of Commerce. The scope of work shall be developed in consultation with and approved by the Department of Commerce. This third-party monitor will report directly to and will be under the control of the Department of Commerce with costs borne by the Permittees. Department of Commerce staff shall keep records of compliance with this section and will ensure that status reports detailing the construction monitoring are filed with the Commission in accordance with scope of work approved by the Department of Commerce.

5.3.4 Public Services, Public Utilities, and Existing Easements

During Transmission Facility construction, the Permittees shall minimize any disruption to public services or public utilities. To the extent disruptions to public services or public utilities occur these shall be temporary, and the Permittees shall restore service promptly. Where any impacts to utilities have the potential to occur the Permittees shall work with both landowners and local entities to determine the most appropriate mitigation measures if not already considered as part of this route permit.

The Permittees shall cooperate with county and city road authorities to develop appropriate signage and traffic management during construction. The Permittees shall keep records of compliance with this section and provide them upon the request of Department of Commerce staff or Commission staff.

5.3.5 Temporary Workspace

The Permittees shall limit temporary easements to special construction access needs and additional staging or lay-down areas required outside of the authorized right-of-way. Temporary space shall be selected to limit the removal and impacts to vegetation. The Permittees shall obtain temporary easements outside of the authorized transmission line right-of-way from affected landowners through rental agreements. Temporary easements are not provided for in this route permit.

The Permittees may construct temporary driveways between the roadway and the structures to minimize impact using the shortest route feasible. The Permittees shall use construction mats to minimize impacts on access paths and construction areas. The Permittees shall submit the location of temporary workspaces and driveways with the plan and profile pursuant to Section 9.1.

5.3.6 Noise

The Permittees shall comply with noise standards established under Minn. R. 7030.0010 to 7030.0080. The Permittees shall limit construction and maintenance activities to daytime working hours to the extent practicable.

5.3.7 Aesthetics

The Permittees shall consider input pertaining to visual impacts from landowners or land management agencies prior to final location of structures, rights-of-way, and other areas with the potential for visual disturbance. The Permittees shall use care to preserve the natural landscape, minimize tree removal and prevent any unnecessary destruction of the natural surroundings in the vicinity of the Transmission Facility during construction and maintenance. The Permittees shall work with landowners to locate the high-voltage transmission line to minimize the loss of agricultural land, forest, and wetlands, and to avoid homes and farmsteads. The Permittees shall place structures at a distance, consistent with sound engineering principles and system reliability criteria, from intersecting roads, highways, or trail crossings.

5.3.8 Soil Erosion and Sediment Control

The Permittees shall implement those erosion prevention and sediment control practices recommended by the Minnesota Pollution Control Agency (MPCA) Construction Stormwater Program. If construction of the Transmission Facility disturbs more than one acre of land or is sited in an area designated by the MPCA as having potential for impacts to water resources, the Permittees shall obtain a National Pollutant Discharge Elimination System/State Disposal System Construction Stormwater Permit from the MPCA that provides for the development of a Stormwater Pollution Prevention Plan that describes methods to control erosion and runoff.

The Permittees shall implement reasonable measures to minimize erosion and sedimentation during construction and shall employ perimeter sediment controls, protect exposed soil by promptly planting, seeding, using erosion control blankets and turf reinforcement mats, stabilizing slopes, protecting storm drain inlets, protecting soil stockpiles, and controlling vehicle tracking. Contours shall be graded as required so that all surfaces provide for proper drainage, blend with the natural terrain, and are left in a condition that will facilitate re-vegetation and prevent erosion. All areas disturbed during construction of the Transmission Facility shall be returned to pre-construction conditions.

5.3.9 Wetlands and Water Resources

The Permittees shall develop wetland impact avoidance measures and implement them during construction of the Transmission Facility. Measures shall include spacing and placing the power poles at variable distances to span and avoid wetlands, watercourses, and floodplains.

Unavoidable wetland impacts as a result of the placement of poles shall be limited to the immediate area around the poles. To minimize impacts, the Permittees shall construct in wetland areas during frozen ground conditions where practicable and according to permit requirements by the applicable permitting authority. When construction during winter is not possible, the Permittees shall use wooden or composite mats to protect wetland vegetation.

The Permittees shall contain soil excavated from the wetlands and riparian areas and not place it back into the wetland or riparian area. The Permittees shall access wetlands and riparian areas using the shortest route possible in order to minimize travel through wetland areas and prevent unnecessary impacts. The Permittees shall not place staging or stringing set up areas within or adjacent to wetlands or water resources, as practicable. The Permittees shall assemble power pole structures on upland areas before they are brought to the site for installation.

The Permittees shall restore wetland and water resource areas disturbed by construction activities to pre-construction conditions in accordance with the requirements of applicable state and federal permits or laws and landowner agreements. The Permittees shall meet the USACE, Minnesota Department of Natural Resources (DNR), Minnesota Board of Water and Soil Resources, and local units of government wetland and water resource requirements.

5.3.10 Vegetation Management

The Permittees shall minimize the number of trees to be removed in selecting the right-of-way specifically preserving to the maximum extent practicable windbreaks, shelterbelts, living snow fences, and vegetation in areas such as trail and stream crossings where vegetative screening may minimize aesthetic impacts, to the extent that such ~~actions~~action do not violate sound engineering principles or system reliability criteria.

The Permittees shall remove tall growing species located within the transmission line ~~right-of-way~~right-of-way that endanger the safe and reliable operation of the transmission line. The Permittees shall leave undisturbed, to the extent possible, existing low growing species in the right-of-way or replant such species in the right-of-way to blend the difference between the right-of-way and adjacent areas, to the extent that the low growing vegetation ~~that~~ will not pose a threat to the transmission line or impede construction.

5.3.11 Application of Pesticides

The Permittees shall restrict pesticide use to those pesticides and methods of application approved by the Minnesota Department of Agriculture (MDA), DNR, and the U.S. Environmental Protection Agency (EPA). Selective foliage or basal application shall be used when practicable. All pesticides shall be applied in a safe and cautious manner so as not to damage adjacent properties including crops, orchards, tree farms, apiaries, or gardens. The Permittees shall contact the landowner at least 14 days prior to pesticide application on their property. The Permittees may not apply any pesticide if the landowner requests that there be no application of pesticides within the landowner's property. The Permittees shall provide notice of pesticide application to landowners and beekeepers operating [Minnesota Department of Agriculture registered](#) apiaries within three miles of the pesticide application area at least 14 days prior to such application. [The Permittees shall use the Minnesota Department of Agriculture's Apiary Registry \(<https://mn.beecheck.org/map>\) to identify apiaries for purposes of compliance with this condition.](#) The Permittees shall keep pesticide communication and application records and provide them upon the request of Department of Commerce staff or Commission staff.

5.3.12 Invasive Species

The Permittees shall employ best management practices to avoid the potential introduction and spread of invasive species on lands disturbed by Transmission Facility construction activities. The Permittees shall develop an Invasive Species Prevention Plan and file it with the Commission at least 14 days prior to the pre-construction meeting. The Permittees shall comply with the most recently filed Invasive Species Prevention Plan.

5.3.13 Noxious Weeds

The Permittees shall take all reasonable precautions against the spread of noxious weeds during all phases of construction. When utilizing seed to establish temporary and permanent vegetative cover on exposed soil the Permittees shall select site appropriate seed certified to be free of noxious weeds. To the extent possible, the Permittees shall use native seed mixes. The Permittees shall keep records of compliance with this section and provide them upon the request of Department of Commerce staff or Commission staff.

5.3.14 Roads

The Permittees shall advise the appropriate governing bodies having jurisdiction over all state, county, city, or township roads that will be used during the construction phase of the Transmission Facility. Where practical, existing roadways shall be used for all activities associated with construction of the Transmission Facility. Oversize or overweight loads associated with the Transmission Facility shall not be hauled across public roads without required permits and approvals.

The Permittees shall construct the fewest number of site access roads required. Access roads shall not be constructed across streams and drainage ways without the required permits and approvals. Access roads shall be constructed in accordance with all necessary township, county or state road requirements and permits.

The Permittees shall promptly repair private roads or lanes damaged when moving equipment or when accessing construction workspace, unless otherwise negotiated with the affected landowner.

5.3.15 Archaeological and Historic Resources

The Permittees shall make every effort to avoid impacts to archaeological and historic resources when constructing the Transmission Facility. In the event that a resource is encountered, the Permittees shall consult with the State Historic Preservation Office and the State Archaeologist. Where feasible, avoidance of the resource is required. Where not feasible, mitigation must include an effort to minimize Transmission Facility impacts on the resource consistent with State Historic Preservation Office and State Archaeologist requirements.

Prior to construction, the Permittees shall train workers about the need to avoid cultural properties, how to identify cultural properties, and procedures to follow if undocumented cultural properties, including gravesites, are found during construction. If human remains are encountered during construction, the Permittees shall immediately halt construction and promptly notify local law enforcement and the State Archaeologist. The Permittees shall not resume construction at such location until authorized by local law enforcement or the State Archaeologist. The Permittees shall keep records of compliance with this section and provide them upon the request of Department of Commerce staff or Commission staff.

5.3.16 Avian Protection

The Permittees in cooperation with the DNR shall identify areas of the transmission line where bird flight diverters will be incorporated into the transmission line design to prevent large avian collisions attributed to visibility issues. Standard transmission design shall incorporate adequate spacing of conductors and grounding devices in accordance with Avian Power Line Interaction Committee standards to eliminate the risk of electrocution to raptors with larger wingspans that may simultaneously come in contact with a conductor and grounding devices. The Permittees shall submit documentation of its avian protection coordination with the plan and profile pursuant to Section [9-19.2](#).

5.3.17 Drainage Tiles

The Permittees shall avoid, promptly repair, or replace all drainage tiles broken or damaged

during all phases of the Transmission Facility's life unless otherwise negotiated with the affected landowner. The Permittees shall keep records of compliance with this section and provide them upon the request of Department of Commerce staff or Commission staff.

5.3.18 Restoration

The Permittees shall restore the right-of-way, temporary workspaces, access roads, abandoned right-of-way, and other public or private lands affected by construction of the Transmission Facility. Restoration within the right-of-way must be compatible with the safe operation, maintenance, and inspection of the transmission line. Within 60 days after completion of all restoration activities, the Permittees shall file with the Commission a Notice of Restoration Completion.

5.3.19 Cleanup

The Permittees shall remove and properly dispose of all construction waste and scrap from the right-of-way and all premises on which construction activities were conducted upon completion of each task. The Permittees shall remove and properly dispose of all personal litter, including bottles, cans, and paper from construction activities daily.

5.3.20 Pollution and Hazardous Wastes

The Permittees shall take all appropriate precautions to protect against pollution of the environment. The Permittees shall be responsible for compliance with all laws applicable to the generation, storage, transportation, clean up and disposal of all waste generated during construction and restoration of the Transmission Facility.

5.3.21 Damages

The Permittees shall fairly restore or compensate landowners for damage to crops, fences, private roads and lanes, landscaping, drain tile, or other damages sustained during construction. The Permittees shall keep records of compliance with this section [that includes the date the Permittees were notified of the damages and when the restoration or compensation was completed](#) and provide them upon the request of Department of Commerce staff or Commission staff.

5.4 Electrical Performance Standards

5.4.1 Grounding

The Permittees shall design, construct, and operate the transmission line in a manner so that the maximum induced steady-state short-circuit current shall be limited to five milliamperes root mean square (rms) alternating current between the ground and any non-stationary object

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within the right-of-way, including but not limited to large motor vehicles and agricultural equipment. All fixed metallic objects on or off the right-of-way, except electric fences that parallel or cross the right-of-way, shall be grounded to the extent necessary to limit the induced short-circuit current between ground and the object so as not to exceed one milliampere rms under steady state conditions of the transmission line and to comply with the ground fault conditions specified in the National Electric Safety Code. The Permittees shall address and rectify any induced current problems that arise during transmission line operation.

5.4.2 Electric Field

The Permittees shall design, construct, and operate the transmission line in such a manner that the electric field measured one meter above ground level immediately below the transmission line shall not exceed 8.0 kV/m rms.

5.4.3 Interference with Communication Devices

If interference with radio or television, satellite, wireless internet, GPS-based agriculture navigation systems or other communication devices is caused by the presence or operation of the Transmission Facility, the Permittees shall take whatever action is necessary to restore or provide reception equivalent to reception levels in the immediate area just prior to the construction of the Transmission Facility. The Permittees shall keep records of compliance with this section and provide them upon the request of Department of Commerce staff or Commission staff.

5.5 Other Requirements

5.4.45.5.1 Safety Codes and Design Requirements

The Permittees shall design the transmission line and associated facilities to meet or exceed all relevant local and state codes, the National Electric Safety Code, and North American Electric Reliability Corporation requirements. This includes standards relating to clearances to ground, clearance to crossing utilities, clearance to buildings, strength of materials, clearances over roadways, right-of-way widths, and permit requirements.

5.4.55.5.2 Other Permits and Regulations

The Permittees shall comply with all applicable state statutes and rules. The Permittees shall obtain all required permits for the Transmission Facility and comply with the conditions of those permits unless those permits conflict with or are preempted by federal or state permits and regulations.

At least 14 days prior to the pre-construction meeting, the Permittees shall file with the Commission an Other Permits and Regulations Submittal that contains a detailed status of all

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permits, authorizations, and approvals that have been applied for specific to the Transmission Facility. The Other Permits and Regulations Submittal shall also include the permitting agency name; the name of the permit, authorization, or approval being sought; contact person and contact information for the permitting agency or authority; brief description of why the permit, authorization, or approval is needed; application submittal date; and the date the permit, authorization, or approval was issued or is anticipated to be issued.

The Permittees shall demonstrate that it has obtained ~~all~~ necessary permits, authorizations, and approvals by filing an affidavit stating as such and an updated Other Permits and Regulations Submittal prior to commencing construction. The Permittees shall provide a copy of any such permits, authorizations, and approvals at the request of Department of Commerce staff or Commission staff.

6 SPECIAL CONDITIONS

The special conditions shall take precedence over other conditions of this permit should there be a conflict.

6.1 Vegetation Management Plan

The Permittees ~~shall develop~~ filed with their Application a vegetation management plan ~~in coordination with Department of Commerce, Energy Environmental Review and Analysis (EERA) and DNR. The vegetation management plan and documentation of the coordination efforts between the permittees and the coordinating agencies shall be filed at least 14 days prior to the plan and profile for the project. The Permittee shall provide all affected landowners with a copy of the plan.~~ (VMP) for review and comment by all interested persons, including EERA and the MnDNR. The Permittees shall revise the VMP to include the following revisions identified by EERA and the MnDNR during this proceeding:

- Avoidance plans should be incorporated into the VMP as appropriate.
- Any conditions related to vegetation management associated with any permits issued by a state or federal agency for the Permitted Route that have been identified as of the date the VMP is filed with the Commission prior to commencing Project vegetation clearing or construction, with the understanding that the VMP shall also include a condition that any additional vegetation management conditions necessary for compliance with any state or federal permit issued for the Project not explicitly identified in the VMP at the time of filing will be incorporated by reference

[to date, no comments have been received]

~~The vegetation management plan must include the following:~~

The Permittees shall file the VMP with these revisions incorporated with the Commission, as applicable, with the plan for vegetation clearing under Section 6.1.6 required under this permit or with the plan and profile required under Section 9.2 of this permit. The Permittees shall provide all landowners along the route with copies of the VMP and an electronic copy (including by website

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address) shall be sufficient. The Permittees shall file an affidavit of its distribution of the VMP to landowners with the Commission no later than, as applicable, with the filing of plan for vegetation clearing or the compliance filing required under Section 5.3.1 of this Permit. Such notice to landowners may be provided for only those portions of the Project that are the subject of the plan for vegetation clearing for each phase of the Project.

~~Management objectives addressing short term goals (seeding and establishment) and long term goals (life of the project).~~

~~A description of planned restoration and vegetation management activities, including how the route will be prepared, timing of activities, how seeding will occur (broadcast, drilling, etc.), and the types of seed mixes to be used.~~

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~~A description of tree removal/planting activities and the timing of such activities.
A description of how the route will be monitored and evaluated to meet management goals.
A description of the management tools used to maintain vegetation (e.g., mowing, spot spraying, hand removal, fire, grazing, etc.), including the timing and frequency of maintenance activities.~~

6.2 Agricultural Impact Mitigation Plan

~~In coordination with the MDA, the Permittees shall prepare~~ The Permittee developed an agricultural impact mitigation plan (AIMP). ~~The AIMP shall be filed at least 14 days prior to the pre-construction meeting in coordination with the MDA that includes all revisions requested by the MDA.~~ The Permittees shall provide all affected landowners with a copy of the plan.

6.3 Dust Control

The Permittees shall utilize non-chloride products for dust control during construction.

6.4 Wildlife-Friendly Erosion Control

The Permittees shall use only “bio-netting” or “natural netting” types and mulch products without synthetic (plastic) fiber additives.

6.5 Project Lighting

The Permittees must use shielded and downward facing lighting and LED lighting that minimizes blue hue for all new project substation and compensation station facilities. Downward facing lighting must be clearly visible on the plan and profile(s) submitted for the project.

6.6 Vegetation Clearing Before Construction

If the Permittees will clear vegetation for any portion of the Transmission Facility prior to completion of the design necessary to provide a plan and profile contemplated under Section 9, the Permittees shall file with the Commission at least 14 days prior to such vegetation clearing activities:

- The Vegetation Management Plan contemplated under Section 6.1 of this Route Permit that is applicable to any portion of the Transmission Facility being proposed for vegetation clearing;
- A map showing the area proposed for vegetation removal and its location within the Designated Route and compared to the right-of-way identified in this route permit;
- A statement of confirmation that the Permittees have obtained, or will obtain before commencing, necessary land rights and agency permits for the vegetation removal in this area;

- The Permittees' plan for notification of Field Representative for landowners in the identified area; and
- If the Permittees have made any modifications to the right-of-way or alignment within the Designated Route from that identified in this route permit, the Permittee shall demonstrate that the right-of-way to be cleared of vegetation will be located so as to have comparable overall impacts relative to the factors in Minn. R. 7850.4100, as does the right-of-way and alignment identified in this route permit.

6.7 Substation Construction

Notwithstanding any other requirement in this Permit, Permittees may commence construction of the substations identified in Section 2.3 of this Permit, provided that Permittees comply, as applicable, with Sections 9.1 and 9.2 of this Permit with respect to the specific scope of the construction activities sought to be conducted by Permittees.

7 DELAY IN CONSTRUCTION

If the Permittees has not commenced construction or improvement of the route within four years after the date of issuance of this route permit the Permittees shall file a Failure to Construct Report and the Commission shall consider suspension of this route permit in accordance with Minn. R. 7850.4700.

8 COMPLAINT PROCEDURES

At least 14 days prior to the pre-construction meeting, the Permittees shall file with the Commission the complaint procedures that will be used to receive and respond to complaints. The complaint procedures shall be in accordance with the requirements of Minn. R. 7829.1500 or Minn. R. 7829.1700, and as set forth in the complaint procedures attached to this route permit.

Upon request, the Permittees shall assist Department of Commerce staff or Commission staff with the disposition of unresolved or longstanding complaints. This assistance shall include, but is not limited to, the submittal of complaint correspondence and complaint resolution efforts.

9 COMPLIANCE REQUIREMENTS

Failure to timely and properly make compliance filings required by this route permit is a failure to comply with the conditions of this route permit. Compliance filings must be electronically filed with the Commission.

9.1 Pre-Construction Meeting

Prior to the start of construction, the Permittees shall participate in a pre-construction meeting with Department of Commerce and Commission staff to review pre-construction filing requirements, scheduling, and to coordinate monitoring of construction and site restoration activities. [Because the Project may be constructed in segments, multiple pre-construction meetings and submissions under Section 9.2 are allowed.](#) Within 14 days following the pre-construction meeting, the Permittees shall file with the Commission a summary of the topics reviewed and discussed and a list of attendees. The Permittees shall indicate in the filing the anticipated construction start date.

9.2 Plan and Profile

At least 14 days prior to the pre-construction meeting, the Permittees shall file with the Commission, and provide the Department of Commerce, and the counties where the Transmission Facility, or portion of the Transmission Facility, will be constructed with a plan and profile of the right-of-way and the specifications and drawings for right-of-way preparation, construction, structure specifications and locations, cleanup, and restoration for the Transmission Facility. The documentation shall include maps depicting the plan and profile including the right-of-way, alignment, and structures in relation to the route and alignment approved per this route permit.

The Permittees may not commence construction until the earlier of (i) 30 days after the pre-construction meeting or (ii) or until the Commission staff has notified the Permittees in writing that it has completed its review of the documents and determined that the planned construction is consistent with this route permit.

If the Commission notifies the Permittees in writing within 30 days after the pre-construction meeting that it has completed its review of the documents and planned construction, and finds that the planned construction is not consistent with this route permit, the Permittees may submit additional and/or revised documentation and may not commence construction until the Commission has notified the Permittees in writing that it has determined that the planned construction is consistent with this route permit.

If the Permittees intends to make any significant changes in its plan and profile or the specifications and drawings after submission to the Commission, the Permittees shall notify the Commission, the Department of Commerce, and county staff at least five days before implementing the changes. No changes shall be made that would be in violation of any of the terms of this route permit.

9.3 Status Reports

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The Permittees shall file with the Commission monthly Construction Status Reports beginning with the pre-construction meeting and until completion of restoration. Construction Status Reports shall describe construction activities and progress, activities undertaken in compliance with this route permit, and shall include text and photographs.

If the Permittees does not commence construction of the Transmission Facility within six months of this route permit issuance, the Permittees shall file with the Commission Pre-Construction Status Reports on the anticipated timing of construction every six months beginning with the issuance of this route permit until the pre-construction meeting.

9.4 In-Service Date

At least three days before the Transmission Facility is to be placed into service, the Permittees shall notify the Commission of the date on which the Transmission Facility will be placed into service and the date on which construction was completed.

9.5 As-Builts

Within 90 days after completion of construction, the Permittees shall submit to the Commission copies of all final as-built plans and specifications developed during the Transmission Facility construction.

9.6 GPS Data

Within 90 days after completion of construction, the Permittees shall submit to the Commission, in the format requested by the Commission, geo-spatial information (*e.g.*, ArcGIS compatible map files, GPS coordinates, associated database of characteristics) for all structures associated with the Transmission Facility and each substation connected.

9.7 Right of Entry

The Permittees shall allow Commission designated representatives to perform the following, upon reasonable notice, upon presentation of credentials and at all times in compliance with the Permittees' site safety standards:

- (a) To enter upon the facilities easement of the property for the purpose of obtaining information, examining records, and conducting surveys or investigations.
- (b) To bring such equipment upon the facilities easement of the property as is necessary to conduct such surveys and investigations.
- (c) To sample and monitor upon the facilities easement of the property.
To examine and copy any documents pertaining to compliance with the conditions of this route permit.

10 ROUTE PERMIT AMENDMENT

This route permit may be amended at any time by the Commission. Any person may request an amendment of the conditions of this route permit by submitting a request to the Commission in writing describing the amendment sought and the reasons for the amendment. The Commission will mail notice of receipt of the request to the Permittees. The Commission may amend the conditions after affording the Permittees and interested persons such process as is required under Minn. R. 7850.4900.

11 TRANSFER OF ROUTE PERMIT

The Permittees may request at any time that the Commission transfer this route permit to another person or entity (transferee). In its request, the Permittees must provide the Commission with:

- (a) the name and description of the transferee;
- (b) the reasons for the transfer;
- (c) a description of the facilities affected; and
- (d) the proposed effective date of the transfer.

The transferee must provide the Commission with a certification that it has read, understands and is able to comply with the plans and procedures filed for the Transmission Facility and all conditions of this route permit. The Commission may authorize transfer of the route permit after affording the Permittees, the transferee, and interested persons such process as is required under Minn. R. 7850.5000.

12 REVOCATION OR SUSPENSION OF ROUTE PERMIT

The Commission may initiate action to revoke or suspend this route permit at any time. The Commission shall act in accordance with the requirements of Minn. R. 7850.5100, to revoke or suspend this route permit.

IN THE MATTER OF THE APPLICATION OF
MINNESOTA POWER AND GREAT RIVER
ENERGY FOR A CERTIFICATE OF NEED AND
ROUTE PERMIT FOR THE NORTHLAND
RELIABILITY PROJECT 345 kV
TRANSMISSION LINE

MPUC DOCKET Nos. E015,ET2/CN-22-415
AND E015,ET2/TL-22-416

OAH DOCKET No. 21-2500-39822

CERTIFICATE OF SERVICE

Carly Krause certifies that on the 25th day of November, 2024, on behalf of Minnesota Power and Great River Energy, she efiled a true and correct copy of the **Exceptions to the Administrative Law Judge's Findings of Fact, Conclusions of Law, and Recommendations** via [eDockets](#). Said document was also served via U.S. Mail or email as designated on the attached Service Lists on file with the Minnesota Public Utilities Commission in the above-referenced dockets.

/s/ Carly Krause

Carly Krause

| # | First Name | Last Name | Email | Organization | Agency | Address | Delivery Method | Alternate Delivery Method | View Trade Secret | Service List Name |
|----|---------------|--------------------|------------------------------------|---|---|---|--------------------|---------------------------|-------------------|-------------------|
| 1 | Lisa | Agrimonti | lagrimonti@fredlaw.com | Fredrikson & Byron, P.A. | | 60 South Sixth Street Suite 1500 Minneapolis MN, 55402-4400 United States | Electronic Service | | No | 22-415Official |
| 2 | Jim | Atkinson | jbatkinson@allete.com | Minnesota Power | | 30 West Superior Street Duluth MN, 55802 United States | Electronic Service | | No | 22-415Official |
| 3 | Generic | Commerce Attorneys | commerce.attorneys@ag.state.mn.us | | Office of the Attorney General - Department of Commerce | 445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States | Electronic Service | | Yes | 22-415Official |
| 4 | MP Regulatory | Compliance | mpregulatorycompliance@mnpower.com | Minnesota Power | | 30 W Superior St. Duluth MN, 55802 United States | Electronic Service | | No | 22-415Official |
| 5 | Brandon | Crawford | brandonc@cubminnesota.org | Citizens Utility Board of Minnesota | | 332 Minnesota St Ste W1360 St. Paul MN, 55101 United States | Electronic Service | | No | 22-415Official |
| 6 | Richard | Dornfeld | richard.dornfeld@ag.state.mn.us | | Office of the Attorney General - Department of Commerce | Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul MN, 55101 United States | Electronic Service | | No | 22-415Official |
| 7 | Adam | Duininck | aduininck@ncsrcc.org | North Central States Regional Council of Carpenters | | 700 Olive Street St. Paul MN, 55130 United States | Electronic Service | | No | 22-415Official |
| 8 | Bret | Eknes | bret.eknes@state.mn.us | | Public Utilities Commission | Suite 350 121 7th Place East St. Paul MN, 55101-2147 United States | Electronic Service | | No | 22-415Official |
| 9 | Sharon | Ferguson | sharon.ferguson@state.mn.us | | Department of Commerce | 85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States | Electronic Service | | No | 22-415Official |
| 10 | Zachary | Golkowski | zgolkowski@mnpower.com | Minnesota Power | | 30 W. Superior Street Duluth MN, 55802 United States | Electronic Service | | No | 22-415Official |

| # | First Name | Last Name | Email | Organization | Agency | Address | Delivery Method | Alternate Delivery Method | View Trade Secret | Service List Name |
|----|------------|--------------|------------------------------|---|--|---|--------------------|---------------------------|-------------------|-------------------|
| 11 | Abigail | Hencheck | ahencheck@mncenter.org | Minnesota Center for Environmental Advocacy | | 1919 University Ave W Suite 515 St. Paul MN, 55104 United States | Electronic Service | | No | 22-415Official |
| 12 | Valerie | Herring | vherring@taftlaw.com | Taft Stettinius & Hollister LLP | | 2200 IDS Center 80 S. Eighth Street Minneapolis MN, 55402 United States | Electronic Service | | No | 22-415Official |
| 13 | Brian | Hunker | bhunker@greenergy.com | Great River Energy | | 12300 Elm Creek Blvd Maple Grove MN, 55369 United States | Electronic Service | | No | 22-415Official |
| 14 | Craig | Janezich | craig.janezich@state.mn.us | | Public Utilities Commission | 121 7th Pl E #350 St. Paul MN, 55101 United States | Electronic Service | | No | 22-415Official |
| 15 | Raymond | Kirsch | raymond.kirsch@state.mn.us | | Department of Commerce | 85 7th Place E Ste 500 St. Paul MN, 55101 United States | Electronic Service | | No | 22-415Official |
| 16 | Stacy | Kotch Egstad | stacy.kotch@state.mn.us | | MINNESOTA DEPARTMENT OF TRANSPORTATION | 395 John Ireland Blvd, St. Paul MN, 55155 United States | Electronic Service | | No | 22-415Official |
| 17 | Jennifer | Kuklenski | jkuklenski@mnpower.com | Minnesota Power | | 30 West Superior Street Duluth MN, 55082 United States | Electronic Service | | No | 22-415Official |
| 18 | Dan | Leshner | dlesher@greenergy.com | Great River Energy | | 12300 Elm Creek Blvd Maple Grove MN, 55369 United States | Electronic Service | | No | 22-415Official |
| 19 | Discovery | Manager | discoverymanager@mnpower.com | Minnesota Power | | 30 W Superior St Duluth MN, 55802 United States | Electronic Service | | No | 22-415Official |
| 20 | John | McElfresh | john@bvgassistedliving.com | | | 18323 County Road 22 Brainerd MN, 56401 United States | Electronic Service | | No | 22-415Official |
| 21 | Brian | Meloy | bmeloy@greenergy.com | Great River Energy | | 12300 Elm Creek Blvd Maple Grove MN, 55369 United States | Electronic Service | | No | 22-415Official |

| # | First Name | Last Name | Email | Organization | Agency | Address | Delivery Method | Alternate Delivery Method | View Trade Secret | Service List Name |
|----|----------------|--------------------------------|--------------------------------------|---|---|--|--------------------|---------------------------|-------------------|-------------------|
| 22 | Kimberly | Middendorf | kimberly.middendorf@state.mn.us | | Office of Administrative Hearings | PO Box 64620 600 Robert St N Saint Paul MN, 55164-0620 United States | Electronic Service | | No | 22-415Official |
| 23 | David | Moeller | dmoeller@allete.com | Minnesota Power | | | Electronic Service | | No | 22-415Official |
| 24 | Carol A. | Overland | overland@legalelectric.org | Legalelectric - Overland Law Office | | 1110 West Avenue Red Wing MN, 55066 United States | Electronic Service | | No | 22-415Official |
| 25 | Andre | Porter | misolegal@misoenergy.org | MISO | | 720 City Center Drive Carmel IN, 46032 United States | Electronic Service | | No | 22-415Official |
| 26 | Kevin | Pranis | kpranis@liunagro.com | Laborers' District Council of MN and ND | | 81 E Little Canada Road St. Paul MN, 55117 United States | Electronic Service | | No | 22-415Official |
| 27 | Generic Notice | Residential Utilities Division | residential.utilities@ag.state.mn.us | | Office of the Attorney General - Residential Utilities Division | 1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States | Electronic Service | | Yes | 22-415Official |
| 28 | Nathaniel | Runke | nrunke@local49.org | | | 611 28th St. NW Rochester MN, 55901 United States | Electronic Service | | No | 22-415Official |
| 29 | Will | Seuffert | will.seuffert@state.mn.us | | Public Utilities Commission | 121 7th Pl E Ste 350 Saint Paul MN, 55101 United States | Electronic Service | | Yes | 22-415Official |
| 30 | Janet | Shaddix Elling | jshaddix@janetshaddix.com | Shaddix And Associates | | 7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States | Electronic Service | | No | 22-415Official |
| 31 | Kodi | Verhalen | kverhalen@taftlaw.com | Taft Stettinius & Hollister LLP | | 80 S 8th St Ste 2200 Minneapolis MN, 55402 United States | Electronic Service | | No | 22-415Official |
| 32 | Haley | Waller Pitts | hwallerpitts@fredlaw.com | Fredrikson & Byron, P.A. | | 60 S Sixth St Ste 1500 Minneapolis MN, 55402-4400 United States | Electronic Service | | No | 22-415Official |
| 33 | Cynthia | Warzecha | cynthia.warzecha@state.mn.us | Minnesota Department of | | 500 Lafayette Road | Electronic Service | | No | 22-415Official |

| # | First Name | Last Name | Email | Organization | Agency | Address | Delivery Method | Alternate Delivery Method | View Trade Secret | Service List Name |
|---|------------|-----------|-------|-------------------|--------|---|-----------------|---------------------------|-------------------|-------------------|
| | | | | Natural Resources | | Box 25 St. Paul MN, 55155-4040 United States | | | | |

| # | First Name | Last Name | Email | Organization | Agency | Address | Delivery Method | Alternate Delivery Method | View Trade Secret | Service List Name |
|----|------------|-----------|------------------------------------|--|----------------------|---|--------------------|---------------------------|-------------------|-------------------|
| 1 | Lisa | Agrimonti | lagrimonti@fredlaw.com | Fredrikson & Byron, P.A. | | 60 South Sixth Street Suite 1500 Minneapolis MN, 55402-4400 United States | Electronic Service | | No | 22-416Official |
| 2 | Michael | Ahern | ahern.michael@dorsey.com | Dorsey & Whitney, LLP | | 50 S 6th St Ste 1500 Minneapolis MN, 55402-1498 United States | Electronic Service | | No | 22-416Official |
| 3 | Steve | Albrecht | steve.albrecht@shakopeedakota.org | Shakopee Mdewakanton Sioux Community | | Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States | Electronic Service | | No | 22-416Official |
| 4 | Jay | Anderson | jaya@cmpas.org | CMPAS | | 7550 Corporate Way Suite 100 Eden Prairie MN, 55344 United States | Electronic Service | | No | 22-416Official |
| 5 | Keith | Anderson | keith.anderson@shakopeedakota.org | Shakopee Mdewakanton Sioux Community | | Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States | Electronic Service | | No | 22-416Official |
| 6 | Kristine | Anderson | kanderson@greatermngas.com | Greater Minnesota Gas, Inc. | | 1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States | Electronic Service | | No | 22-416Official |
| 7 | Jaime | Arsenault | jaime.arsenault@whiteearth-nsn.gov | White Earth | | PO BOX 418 White Earth MN, 56591 United States | Electronic Service | | No | 22-416Official |
| 8 | Jim | Atkinson | jbatkinson@allete.com | Minnesota Power | | 30 West Superior Street Duluth MN, 55802 United States | Electronic Service | | No | 22-416Official |
| 9 | David | Bell | david.bell@state.mn.us | | Department of Health | POB 64975 St. Paul MN, 55164 United States | Electronic Service | | No | 22-416Official |
| 10 | Melanie | Benjamin | melanie.benjamin@millelacsband.com | | | 43408 Oodena Drive Onamia MN, 56359 United States | Electronic Service | | No | 22-416Official |
| 11 | James J. | Bertrand | james.bertrand@stinson.com | STINSON LLP | | 50 S 6th St Ste 2600 Minneapolis MN, 55402 United States | Electronic Service | | No | 22-416Official |
| 12 | Seth | Bichler | sethbichler@fdlrez.com | Fond du Lac Band of Lake Superior Chippewa | | 1720 Big Lake Rd Cloquet MN, 55720 United States | Electronic Service | | No | 22-416Official |
| 13 | David | Birkholz | david.birkholz@state.mn.us | MN Department of Commerce | | Suite 500 85 7th Place East St. Paul MN, | Electronic Service | | No | 22-416Official |

| # | First Name | Last Name | Email | Organization | Agency | Address | Delivery Method | Alternate Delivery Method | View Trade Secret | Service List Name |
|----|-------------|-------------|---------------------------------|--|---|---|--------------------|---------------------------|-------------------|-------------------|
| | | | | | | 55101-2198 United States | | | | |
| 14 | Michelle F. | Bissonnette | michelle.bissonnette@hdrinc.com | HDR Engineering, Inc. | | Golden Hills Office Center 701 Xenia Ave S Ste 600 Minneapolis MN, 55416 United States | Electronic Service | | No | 22-416Official |
| 15 | Hunter | Boldt | hunterboldt@redlakenation.org | Red Lake Nation | | 15484 Migizi Drive Red Lake MN, 56671 United States | Electronic Service | | No | 22-416Official |
| 16 | Sheldon | Boyd | sheldon.boyd@millelacsband.com | Mille Lacs Band of Ojibwe | | 43408 Oodena Drive Onamia MN, 56359 United States | Electronic Service | | No | 22-416Official |
| 17 | B. Andrew | Brown | brown.andrew@dorsey.com | Dorsey & Whitney LLP | | Suite 1500 50 South Sixth Street Minneapolis MN, 55402-1498 United States | Electronic Service | | No | 22-416Official |
| 18 | Christina | Brusven | cbrusven@fredlaw.com | Fredrikson Byron | | 60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States | Electronic Service | | No | 22-416Official |
| 19 | Scott | Buchanan | scottbuchanan@fdlrez.com | Fond du Lac Band of Lake Superior Chippewa | | 1720 Big Lake Road Cloquet MN, 55720 United States | Electronic Service | | No | 22-416Official |
| 20 | Shelley | Buck | shelley.buck@piic.org | Prairie Island Indian Community | | Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States | Electronic Service | | No | 22-416Official |
| 21 | Robert | Budreau | robert.budreau@llojibwe.net | Leech Lake Band of Ojibwe | | 190 SailStar Drive NW Cass Lake MN, 56633 United States | Paper Service | | No | 22-416Official |
| 22 | James | Canaday | james.canaday@ag.state.mn.us | | Office of the Attorney General - Residential Utilities Division | Suite 1400 445 Minnesota St. St. Paul MN, 55101 United States | Electronic Service | | No | 22-416Official |
| 23 | PUC | CAO | consumer.puc@state.mn.us | | Public Utilities Commission | Consumer Affairs Office 121 7th Place E Suite 350 St. Paul MN, 55101 United States | Electronic Service | | No | 22-416Official |
| 24 | Cathy | Chavers | cchavers@boisforte-nsn.gov | Bois Forte Band of Chippewa | | Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States | Electronic Service | | No | 22-416Official |
| 25 | Michael | Childs, Jr. | michael.childsjr@piic.org | Prairie Island Indian Community | | Prairie Island Indian Community 5636 Sturgeon | Electronic Service | | No | 22-416Official |

| # | First Name | Last Name | Email | Organization | Agency | Address | Delivery Method | Alternate Delivery Method | View Trade Secret | Service List Name |
|----|------------|--------------------|--|--|---|--|--------------------|---------------------------|-------------------|-------------------|
| | | | | | | Lake Road Welch MN, 55089 United States | | | | |
| 26 | Cody | Chilson | cchilson@greatermngas.com | Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC | | 1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States | Electronic Service | | No | 22-416Official |
| 27 | Ray | Choquette | rchoquette@agp.com | Ag Processing Inc. | | 12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States | Electronic Service | | No | 22-416Official |
| 28 | John | Coffman | john@johncoffman.net | AARP | | 871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States | Electronic Service | | No | 22-416Official |
| 29 | Generic | Commerce Attorneys | commerce.attorneys@ag.state.mn.us | | Office of the Attorney General - Department of Commerce | 445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States | Electronic Service | | Yes | 22-416Official |
| 30 | Bill | Cook | bcook@rpu.org | Rochester Public Utilities | | 4000 East River Road NE Rochester MN, 55906 United States | Electronic Service | | No | 22-416Official |
| 31 | John | Crane | johncranefishing@gmail.com | Fishing | | 1250 Wee Gwaus DR SW Bemidji MN, 56601 United States | Electronic Service | | No | 22-416Official |
| 32 | Brandon | Crawford | brandonc@cubminnesota.org | Citizens Utility Board of Minnesota | | 332 Minnesota St Ste W1360 St. Paul MN, 55101 United States | Electronic Service | | No | 22-416Official |
| 33 | Hillary | Creurer | hcreurer@allete.com | Minnesota Power | | 30 W Superior St Duluth MN, 55802 United States | Electronic Service | | No | 22-416Official |
| 34 | George | Crocker | gwillc@nawo.org | North American Water Office | | 5093 Keats Avenue Lake Elmo MN, 55042 United States | Electronic Service | | No | 22-416Official |
| 35 | Rebecca | Crooks Stratton | rebecca_crooks-stratton@shakopeedakota.org | Shakopee Mdewakanton Sioux Community | | Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States | Electronic Service | | No | 22-416Official |
| 36 | Miyah | Danielson | miyahdanielson@fdlrez.com | Fond du Lac Band of Lake Superior Chippewa | | 1720 Big Lake Road Cloquet MN, 55720 United States | Electronic Service | | No | 22-416Official |
| 37 | Thomas | Davis | atdavis1972@outlook.com | - | | 1161 50th Ave Sherburn MN, 56171 United States | Electronic Service | | No | 22-416Official |
| 38 | Jason | Decker | jason.decker@llojibwe.net | Leech Lake Band of Ojibwe | | 190 Sailstar Drive NW Cass Lake | Electronic Service | | No | 22-416Official |

| # | First Name | Last Name | Email | Organization | Agency | Address | Delivery Method | Alternate Delivery Method | View Trade Secret | Service List Name |
|----|------------|----------------|--------------------------------------|---|---------------------------------|--|--------------------|---------------------------|-------------------|-------------------|
| | | | | | | MN, 56633 United States | | | | |
| 39 | Bobby | Deschampe | robertdeschampe@grandportage.com | Grand Portage Band of Lake Superior Chippewa | | PO Box 428 Grand Portage MN, 55605 United States | Electronic Service | | No | 22-416Official |
| 40 | Randall | Doneen | randall.doneen@state.mn.us | | Department of Natural Resources | 500 Lafayette Rd, PO Box 25 Saint Paul MN, 55155 United States | Electronic Service | | No | 22-416Official |
| 41 | John | Drawz | jdrawz@fredlaw.com | Fredrikson & Byron, P.A. | | Suite 1500 60 South Sixth Street Minneapolis MN, 55402-4400 United States | Electronic Service | | No | 22-416Official |
| 42 | Shane | Drift | sdrift@boisforte-nsn.gov | Bois Forte Band of Chippewa | | Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States | Electronic Service | | No | 22-416Official |
| 43 | Adam | Duininck | aduininck@ncsrcc.org | North Central States Regional Council of Carpenters | | 700 Olive Street St. Paul MN, 55130 United States | Electronic Service | | No | 22-416Official |
| 44 | Wally | Dupuis | wallydupuis@fdlband.org | Fond du Lac Band of Lake Superior Chippewa | | 1720 Big Lake Road Cloquet MN, 55720 United States | Electronic Service | | No | 22-416Official |
| 45 | Kevin | Dupuis, Sr. | kevindupuis@fdlrez.com | | | Reservation Business Committee 1720 Big Lake Rd Cloquet MN, 55720 United States | Electronic Service | | No | 22-416Official |
| 46 | Cory | Dutcher | cory.dutcher@ge.com | GE Power and Water | | 1 River Rd, Bldg. 37-413 Schenectady NY, 12345 United States | Electronic Service | | No | 22-416Official |
| 47 | Jamie | Edwards | jamie.edwards@millelacsband.com | Mille Lacs Band of Ojibwe | | 43408 Oodena Drive Onamia MN, 56358 United States | Electronic Service | | No | 22-416Official |
| 48 | Kristen | Eide Tollefson | healingsystems69@gmail.com | R-CURE | | 28477 N Lake Ave Frontenac MN, 55026-1044 United States | Electronic Service | | No | 22-416Official |
| 49 | Matthew | Ellis | mellis@grenergy.com | Great River Energy | | null null, null United States | Electronic Service | | No | 22-416Official |
| 50 | Kyle | Fairbanks | kyle.fairbanks@llojibwe.net | Leech Lake Band of Ojibwe | | 190 Sailstar Drive NW Cass Lake MN, 56633 United States | Electronic Service | | No | 22-416Official |
| 51 | Michael | Fairbanks | michael.fairbanks@whiteearth-nsn.gov | White Earth Reservation Business Committee | | PO Box 418 White Earth MN, 56591 United States | Electronic Service | | No | 22-416Official |
| 52 | Kate | Fairman | kate.fairman@state.mn.us | | Department of Natural Resources | Box 32 500 Lafayette | Electronic Service | | No | 22-416Official |

| # | First Name | Last Name | Email | Organization | Agency | Address | Delivery Method | Alternate Delivery Method | View Trade Secret | Service List Name |
|----|------------|-------------|-------------------------------|--|---------------------------|---|-----------------------|---------------------------|-------------------|--------------------|
| | | | | | | Rd St. Paul MN, 55155-4032 United States | | | | |
| 53 | John | Farrell | jfarrell@ilsr.org | Institute for Local Self- Reliance | | 2720 E. 22nd St Institute for Local Self- Reliance Minneapolis MN, 55406 United States | Electronic Service | | No | 22- 416Official |
| 54 | Eric | Fehlhaber | efehlhaber@dakotaelectric.com | Dakota Electric Association | | 4300 220th St W Farmington MN, 55024 United States | Electronic Service | | No | 22- 416Official |
| 55 | Annie | Felix Gerth | annie.felix-gerth@state.mn.us | | | Board of Water & Soil Resources 520 Lafayette Rd Saint Paul MN, 55155 United States | Electronic Service | | No | 22- 416Official |
| 56 | Sharon | Ferguson | sharon.ferguson@state.mn.us | | Department of Commerce | 85 7th Place E Ste 280 Saint Paul MN, 55101- 2198 United States | Electronic Service | | No | 22- 416Official |
| 57 | Kade | Ferris | kade.ferris@redlakenation.org | Red Lake Region | | PO Box 274 Red Lake MN, 56671 United States | Electronic Service | | No | 22- 416Official |
| 58 | Leonard | Fineday | leonard.fineday@llojibwe.net | Leech Lake Bank of Ojibwe | | 190 Sailstar Drive NW Cass Lake MN, 56633 United States | Electronic Service | | No | 22- 416Official |
| 59 | Terri | Finn | terri.goggleye@llojibwe.net | | | null null, null United States | Electronic Service | | No | 22- 416Official |
| 60 | Henry | Fox | henry.fox@whiteearth-nsn.gov | White Earth Nation | | PO Box 418 White Earth MN, 56569 United States | Electronic Service | | No | 22- 416Official |
| 61 | Gary | Frazer | gfrazier@mnchippewatribe.org | Minnesota Chippewa Tribe | | PO Box 217 Cass Lake MN, 56633 United States | Electronic Service | | No | 22- 416Official |
| 62 | Docketing | Fredlaw | docketing@fredlaw.com | Fredrickson & Byron | | 200 S 6th St, Suite 4000 Minneapolis MN, 55402 United States | Electronic Service | | No | 22- 416Official |
| 63 | Daryll | Fuentes | energy@usg.com | USG Corporation | | 550 W Adams St Chicago IL, 60661 United States | Electronic Service | | No | 22- 416Official |
| 64 | Mary Ann | Gagnon | maryann@grandportage.com | Grand Portage Band of Ojibwe | | PO Box 428 Grand Portage MN, 55605 United States | Electronic Service | | No | 22- 416Official |
| 65 | Karen A | Gebhardt | kageb1@gvtel.com | | | 43901 253rd Ave Leonard MN, 56652-4026 United States | Electronic Service | | No | 22- 416Official |
| 66 | Shannon | Geshick | shannon.geshick@state.mn.us | Minnesota Indian Affairs Council (MIAC) | | null null, null United States | Electronic Service | | No | 22- 416Official |

| # | First Name | Last Name | Email | Organization | Agency | Address | Delivery Method | Alternate Delivery Method | View Trade Secret | Service List Name |
|----|------------|-----------|---------------------------------------|---|--|---|--------------------|---------------------------|-------------------|-------------------|
| 67 | Tara | Geshick | | Bois Forte Band of Chippewa Tribal Government | | 5344 Lakeshore Drive Nett Lake MN, 55772 United States | Paper Service | | No | 22-416Official |
| 68 | Todd | Green | todd.a.green@state.mn.us | | Minnesota Department of Labor & Industry | 443 Lafayette Rd N St. Paul MN, 55155-4341 United States | Electronic Service | | No | 22-416Official |
| 69 | Todd J. | Guerrero | todd.guerrero@kutakrock.com | Kutak Rock LLP | | Suite 1750 220 South Sixth Street Minneapolis MN, 55402-1425 United States | Electronic Service | | No | 22-416Official |
| 70 | Jeremy | Hamilton | jhamilton@uppersiouxcommunity-nsn.gov | Upper Sioux Community | | Upper Sioux Community PO Box 147 Granite Falls MN, 56241 United States | Electronic Service | | No | 22-416Official |
| 71 | Ashley | Harrison | ashley.harrison@llojibwe.net | Leech Lake Band of Ojibwe | | 190 Sailstar Dr NW Cass Lake MN, 56633 United States | Electronic Service | | No | 22-416Official |
| 72 | Larry | Hartman | larry.hartman@state.mn.us | | Department of Commerce | 85 7th Place East, Suite 280 St. Paul MN, 55101 United States | Electronic Service | | No | 22-416Official |
| 73 | Amy | Hastings | amyh@uppersiouxcommunity-nsn.gov | Upper Sioux Community | | 5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States | Electronic Service | | No | 22-416Official |
| 74 | Adam | Heinen | aheinen@dakotaelectric.com | Dakota Electric Association | | 4300 220th St W Farmington MN, 55024 United States | Electronic Service | | No | 22-416Official |
| 75 | Annete | Henkel | mui@mnuutilityinvestors.org | Minnesota Utility Investors | | 413 Wacouta Street #230 St.Paul MN, 55101 United States | Electronic Service | | No | 22-416Official |
| 76 | Valerie | Herring | vherring@taftlaw.com | Taft Stettinius & Hollister LLP | | 2200 IDS Center 80 S. Eighth Street Minneapolis MN, 55402 United States | Electronic Service | | No | 22-416Official |
| 77 | Corey | Hintz | chintz@dakotaelectric.com | Dakota Electric Association | | 4300 220th Street Farmington MN, 55024-9583 United States | Electronic Service | | No | 22-416Official |
| 78 | Michael | Hoppe | lu23@ibew23.org | Local Union 23, I.B.E.W. | | 445 Etna Street Ste. 61 St. Paul MN, 55106 United States | Electronic Service | | No | 22-416Official |
| 79 | Kari | Howe | kari.howe@state.mn.us | | DEED | 332 Minnesota St, #E200 1ST National Bank Bldg St. Paul MN, | Electronic Service | | No | 22-416Official |

| # | First Name | Last Name | Email | Organization | Agency | Address | Delivery Method | Alternate Delivery Method | View Trade Secret | Service List Name |
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| | | | | | | 55101 United States | | | | |
| 80 | Lori | Hoyum | lhoyum@mnpower.com | Minnesota Power | | 30 West Superior Street Duluth MN, 55802 United States | Electronic Service | | No | 22-416Official |
| 81 | Annie | Jackson | cheryl.jackson@whiteearth-nsn.gov | White Earth Nation | | White Earth Tribal Headquarters 35500 Eagle View Road Ogemo MN, 56569 United States | Electronic Service | | No | 22-416Official |
| 82 | Faron | Jackson, Sr. | faron.jackson@llojbwe.net | | | 190 Sailstar Drive NW Cass Lake MN, 56633 United States | Electronic Service | | No | 22-416Official |
| 83 | Travis | Jacobson | travis.jacobson@mdu.com | Great Plains Natural Gas Company | | 400 N 4th St Bismarck ND, 58501 United States | Electronic Service | | No | 22-416Official |
| 84 | Craig | Janezich | craig.janezich@state.mn.us | | Public Utilities Commission | 121 7th PI E #350 St. Paul MN, 55101 United States | Electronic Service | | No | 22-416Official |
| 85 | Alan | Jenkins | aj@jenkinsatlaw.com | Jenkins at Law | | 2950 Yellowtail Ave. Marathon FL, 33050 United States | Electronic Service | | No | 22-416Official |
| 86 | Kevin | Jensvold | kevinj@uppersiouxcommunity-nsn.gov | Upper Sioux Community | | PO Box 147 Granite Falls MN, 56241-0147 United States | Electronic Service | | No | 22-416Official |
| 87 | Jody | Johnson | jody.johnson@piic.org | Prairie Island Indian Community | | 5636 Sturgeon Lake Rd Welch MN, 55089 United States | Electronic Service | | No | 22-416Official |
| 88 | Johnny | Johnson | johnny.johnson@piic.org | Prairie Island Indian Community | | 5636 Sturgeon Lake Road Welch MN, 55089 United States | Electronic Service | | No | 22-416Official |
| 89 | Richard | Johnson | rick.johnson@lawmoss.com | Moss & Barnett | | 150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States | Electronic Service | | No | 22-416Official |
| 90 | Scott | Johnson | scott.johnson@ci.medina.mn.us | City of Medina | | 2052 County Road 24 Medina MN, 55340-9790 United States | Electronic Service | | No | 22-416Official |
| 91 | Sarah | Johnson Phillips | sjphillips@stoel.com | Stoel Rives LLP | | 33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States | Electronic Service | | No | 22-416Official |
| 92 | Michael | Kaluzniak | mike.kaluzniak@state.mn.us | | Public Utilities Commission | Suite 350 121 Seventh Place East St. Paul MN, 55101 United States | Electronic Service | | No | 22-416Official |
| 93 | Nick | Kaneski | nick.kaneski@enbridge.com | Enbridge Energy | | 11 East Superior St | Electronic Service | | No | 22-416Official |

| # | First Name | Last Name | Email | Organization | Agency | Address | Delivery Method | Alternate Delivery Method | View Trade Secret | Service List Name |
|-----|------------|-----------------|----------------------------------|---|--|---|-----------------------|---------------------------|-------------------|--------------------|
| | | | | Company, Inc. | | Ste 125 Duluth MN, 55802 United States | | | | |
| 94 | Tom | Karas | tomskaras@gmail.com | | | 3171 309th Ave NW Cambridge MN, 55008 United States | Electronic Service | | No | 22- 416Official |
| 95 | Bruce | King | brenda@ranww.org | Realtors, Association of Northwestern WI | | Suite 3 1903 Keith Street Eau Claire WI, 54701 United States | Electronic Service | | No | 22- 416Official |
| 96 | Raymond | Kirsch | raymond.kirsch@state.mn.us | | Department of Commerce | 85 7th Place E Ste 500 St. Paul MN, 55101 United States | Electronic Service | | No | 22- 416Official |
| 97 | Chad | Konickson | chad.konickson@usace.army.mil | U.S.Army Corps of Engineers | | 332 Minnesota St. Suite E1500 Saint Paul MN, 55101 United States | Electronic Service | | No | 22- 416Official |
| 98 | Stacy | Kotch Egstad | stacy.kotch@state.mn.us | | MINNESOTA DEPARTMENT OF TRANSPORTATION | 395 John Ireland Blvd. St. Paul MN, 55155 United States | Electronic Service | | No | 22- 416Official |
| 99 | Michael | Krikava | mkrikava@taftlaw.com | Taft Stettinius & Hollister LLP | | 2200 IDS Center 80 S 8th St Minneapolis MN, 55402 United States | Electronic Service | | No | 22- 416Official |
| 100 | Nicolle | Kupser | nkupser@greatermngas.com | Greater Minnesota Gas, Inc. | | 1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States | Electronic Service | | No | 22- 416Official |
| 101 | Mike | Laroque | mike.laroque@whiteearth-nsn.gov | White Earth Nation | | PO Box 418 White Earth MN, 56591 United States | Electronic Service | | No | 22- 416Official |
| 102 | Robert L | Larsen | robert.larsen@lowersioux.com | Lower Sioux Indian Community | | PO Box 308 39527 Reservation Highway 1 Morton MN, 56270 United States | Electronic Service | | No | 22- 416Official |
| 103 | James D. | Larson | james.larson@avantenergy.com | Avant Energy Services | | 220 S 6th St Ste 1300 Minneapolis MN, 55402 United States | Electronic Service | | No | 22- 416Official |
| 104 | Peder | Larson | plarson@larkinhoffman.com | Larkin Hoffman Daly & Lindgren, Ltd. | | 8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States | Electronic Service | | No | 22- 416Official |
| 105 | Dan | Leshner | dlesher@greenergy.com | Great River Energy | | 12300 Elm Creek Blvd Maple Grove MN, 55369 United States | Electronic Service | | No | 22- 416Official |
| 106 | Eric | Lipman | eric.lipman@state.mn.us | | Office of Administrative Hearings | PO Box 64620 St. Paul MN, 55164-0620 United States | Electronic Service | | No | 22- 416Official |
| 107 | Jason | Loos | jason.loos@centerpointenergy.com | CenterPoint Energy | | 505 Nicollet Mall | Electronic Service | | No | 22- 416Official |

| # | First Name | Last Name | Email | Organization | Agency | Address | Delivery Method | Alternate Delivery Method | View Trade Secret | Service List Name |
|-----|------------|------------|------------------------------------|--|---|--|--------------------|---------------------------|-------------------|-------------------|
| | | | | Resources Corp. | | 3rd Floor Minneapolis MN, 55402 United States | | | | |
| 108 | Susan | Ludwig | sludwig@mnpower.com | Minnesota Power | | 30 West Superior Street Duluth MN, 55802 United States | Electronic Service | | No | 22-416Official |
| 109 | Vernelle | Lussier | vernelle.lussier@redlakenation.org | Red Lake Nation | | 15484 Migizi Drive Red Lake MN, 56671 United States | Electronic Service | | No | 22-416Official |
| 110 | Kavita | Maini | kmaini@wi.rr.com | KM Energy Consulting, LLC | | 961 N Lost Woods Rd Oconomowoc WI, 53066 United States | Electronic Service | | No | 22-416Official |
| 111 | Dawn S | Marsh | dawn_marsh@fws.gov | U.S. Fish & Wildlife Service | | Minnesota-Wisconsin Field Offices 4101 American Blvd E Bloomington MN, 55425 United States | Electronic Service | | No | 22-416Official |
| 112 | Shena | Matrious | shena.matrious@millelacsband.com | Mille Lacs Band of Ojibwe | | 43408 Oodena Drive Onamia MN, 56349 United States | Electronic Service | | No | 22-416Official |
| 113 | April | McCormick | aprilm@grandportage.com | Grand Portage Band of Lake Superior Chippewa | | PO Box 428 Grand Portage MN, 55605 United States | Electronic Service | | No | 22-416Official |
| 114 | Brian | Meloy | bmeloy@grenergy.com | Great River Energy | | 12300 Elm Creek Blvd Maple Grove MN, 55369 United States | Electronic Service | | No | 22-416Official |
| 115 | Joseph | Meyer | joseph.meyer@ag.state.mn.us | | Office of the Attorney General - Residential Utilities Division | Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN, 55101-2131 United States | Electronic Service | | No | 22-416Official |
| 116 | Valentina | Mgeni | valentina.mgeni@piic.org | Prairie Island Indian Community | | Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States | Electronic Service | | No | 22-416Official |
| 117 | Kimberly | Middendorf | kimberly.middendorf@state.mn.us | | Office of Administrative Hearings | PO Box 64620 600 Robert St N Saint Paul MN, 55164-0620 United States | Electronic Service | | Yes | 22-416Official |
| 118 | Cole W. | Miller | cole.miller@shakopeedakota.org | Shakopee Mdewakanton Sioux Community | | Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States | Electronic Service | | No | 22-416Official |

| # | First Name | Last Name | Email | Organization | Agency | Address | Delivery Method | Alternate Delivery Method | View Trade Secret | Service List Name |
|-----|------------|------------|---------------------------------------|---|--------|--|--------------------|---------------------------|-------------------|-------------------|
| 119 | Stacy | Miller | stacy.miller@minneapolismn.gov | City of Minneapolis | | 350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States | Electronic Service | | No | 22-416Official |
| 120 | David | Moeller | dmoeller@allete.com | Minnesota Power | | | Electronic Service | | No | 22-416Official |
| 121 | Andrew | Moratzka | andrew.moratzka@stoel.com | Stoel Rives LLP | | 33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States | Electronic Service | | No | 22-416Official |
| 122 | Travis | Morrison | travis.morrison@boisforte-nsn.gov | Bois Forte Band of Chippewa | | Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States | Electronic Service | | No | 22-416Official |
| 123 | Robert | Moyer, Jr. | rmoyer@boisforte-nsn.gov | Bois Forte Band of Chippewa Tribal Government | | 5344 Lakeshore Drive Nett Lake MN, 55772 United States | Electronic Service | | No | 22-416Official |
| 124 | Colleen | Mueller | | | | 22186 State Hwy 4 Paynesville MN, 56362 United States | Paper Service | | No | 22-416Official |
| 125 | Sonny | Myers | smyers@1854treatyauthority.org | 1854 Treaty Authority | | 4428 Haines Rd Duluth MN, 55811-1524 United States | Electronic Service | | No | 22-416Official |
| 126 | Dan | Nelson | dan.nelson@isginc.com | I&S Group | | 115 E Hickory St Ste 300 Mankato MN, 56001 United States | Electronic Service | | No | 22-416Official |
| 127 | David | Niles | david.niles@avantenergy.com | Minnesota Municipal Power Agency | | 220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States | Electronic Service | | No | 22-416Official |
| 128 | Samantha | Norris | samanthanorris@alliantenergy.com | Interstate Power and Light Company | | 200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States | Electronic Service | | No | 22-416Official |
| 129 | Joseph | O'Brien | joey.obrien@lowersioux.com | | | 39527 Highway 1 Morton MN, 56270 United States | Electronic Service | | No | 22-416Official |
| 130 | Samantha | Odegard | samanthao@uppersiouxcommunity-nsn.gov | | | PO Box 147 Granite Falls MN, 56241 United States | Electronic Service | | No | 22-416Official |
| 131 | Matthew | Olsen | molsen@otpc.com | Otter Tail Power Company | | 215 South Cascade Street Fergus Falls MN, 56537 United States | Electronic Service | | No | 22-416Official |
| 132 | Carol A. | Overland | overland@legalelectric.org | Legalelectric - Overland Law Office | | 1110 West Avenue Red Wing MN, 55066 United States | Electronic Service | | No | 22-416Official |

| # | First Name | Last Name | Email | Organization | Agency | Address | Delivery Method | Alternate Delivery Method | View Trade Secret | Service List Name |
|-----|----------------|--------------------------------|---------------------------------------|---|---|--|--------------------|---------------------------|-------------------|-------------------|
| 133 | Greg | Palmer | gpalmer@greatermngas.com | Greater Minnesota Gas, Inc. | | 1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States | Electronic Service | | No | 22-416Official |
| 134 | Earl | Pendleton | earl.pendleton@lowersioux.com | Lower Sioux Indian Community | | 39527 Highway 1 Morton MN, 56270 United States | Electronic Service | | No | 22-416Official |
| 135 | Jennifer | Peterson | jjpeterson@mnpower.com | Minnesota Power | | 30 West Superior Street Duluth MN, 55802 United States | Electronic Service | | No | 22-416Official |
| 136 | Kevin | Peterson | kjp@ibew160.org | | | 1109 Northway Lane NE Rochester MN, 55906 United States | Electronic Service | | No | 22-416Official |
| 137 | Catherine | Phillips | catherine.phillips@wecenergygroup.com | Minnesota Energy Resources | | 231 West Michigan St Milwaukee WI, 53203 United States | Electronic Service | | No | 22-416Official |
| 138 | Angela | Piner | angela.piner@hdrinc.com | HDR, Inc. | | Suite 600 701 Xenia Avenue South Suite 600 Minneapolis MN, 55416 United States | Electronic Service | | No | 22-416Official |
| 139 | Joe | Plumer | joe.plumer@redlakenation.org | Red Lake Nation | | 15484 Migizi Drive Red Lake MN, 56671 United States | Electronic Service | | No | 22-416Official |
| 140 | Andre | Porter | misolegal@misoenergy.org | MISO | | 720 City Center Drive Carmel IN, 46032 United States | Electronic Service | | No | 22-416Official |
| 141 | Kevin | Pranis | kpranis@liunagroc.com | Laborers' District Council of MN and ND | | 81 E Little Canada Road St. Paul MN, 55117 United States | Electronic Service | | No | 22-416Official |
| 142 | Robert | Prescott | bob.prescott@lowersioux.com | Lower Sioux Indian Community | | 39527 Highway 1 Morton MN, 56270 United States | Electronic Service | | No | 22-416Official |
| 143 | Larry | Rebman | larryemls@hotmail.com | EMLS, Inc | | PO Box 122 Appleton MN, 56208 United States | Electronic Service | | No | 22-416Official |
| 144 | Generic Notice | Residential Utilities Division | residential.utilities@ag.state.mn.us | | Office of the Attorney General - Residential Utilities Division | 1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States | Electronic Service | | Yes | 22-416Official |
| 145 | Kevin | Reuther | kreuther@mncenter.org | MN Center for Environmental Advocacy | | 26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States | Electronic Service | | No | 22-416Official |
| 146 | Margaret | Rheude | margaret_rheude@fws.gov | U.S. Fish and Wildlife Service | | Twin Cities Ecological Services Field Office 4101 | Electronic Service | | No | 22-416Official |

| # | First Name | Last Name | Email | Organization | Agency | Address | Delivery Method | Alternate Delivery Method | View Trade Secret | Service List Name |
|-----|------------|----------------|-----------------------------------|-------------------------------------|-------------------------------------|--|--------------------|---------------------------|-------------------|-------------------|
| | | | | | | American Blvd. E. Bloomington MN, 55425 United States | | | | |
| 147 | Susan | Romans | sromans@allete.com | Minnesota Power | | 30 West Superior Street Legal Dept Duulth MN, 55802 United States | Electronic Service | | No | 22-416Official |
| 148 | Stephan | Roos | stephan.roos@state.mn.us | | Minnesota Department of Agriculture | 625 Robert St N Saint Paul MN, 55155-2538 United States | Electronic Service | | No | 22-416Official |
| 149 | Bill | Rudnicki | bill.rudnicki@shakopeedakota.org | Shakopee Mdwakanton Sioux Community | | Shakopee Mdwakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States | Electronic Service | | No | 22-416Official |
| 150 | Nathaniel | Runke | nrunke@local49.org | | | 611 28th St. NW Rochester MN, 55901 United States | Electronic Service | | No | 22-416Official |
| 151 | Miranda | Sam | miranda.sam@lowersioux.com | Lower Sioux Indian Community | | 39527 Reservation Highway 1 PO Box 308 Morton MN, 56270 United States | Electronic Service | | No | 22-416Official |
| 152 | Adam | Savariego | adams@uppersiouxcommunity-nsn.gov | Upper Sioux Community | | 5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States | Electronic Service | | No | 22-416Official |
| 153 | Elizabeth | Schmiesing | eschmiesing@winthrop.com | Winthrop & Weinstine, P.A. | | 225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States | Electronic Service | | No | 22-416Official |
| 154 | Christine | Schwartz | regulatory.records@xcelenergy.com | Xcel Energy | | 414 Nicollet Mall FL 7 Minneapolis MN, 55401-1993 United States | Electronic Service | | No | 22-416Official |
| 155 | Jessie | Seim | jessie.seim@piic.org | Prairie Island Indian Community | | 5636 Sturgeon Lake Rd Welch MN, 55089 United States | Electronic Service | | No | 22-416Official |
| 156 | Darrell | Seki, Sr. | dseki@redlakenation.org | | | 15484 Migizi Drive Red Lake MN, 56671 United States | Electronic Service | | No | 22-416Official |
| 157 | Will | Seuffert | will.seuffert@state.mn.us | | Public Utilities Commission | 121 7th PI E Ste 350 Saint Paul MN, 55101 United States | Electronic Service | | Yes | 22-416Official |
| 158 | Janet | Shaddix Elling | jshaddix@janetshaddix.com | Shaddix And Associates | | 7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States | Electronic Service | | Yes | 22-416Official |

| # | First Name | Last Name | Email | Organization | Agency | Address | Delivery Method | Alternate Delivery Method | View Trade Secret | Service List Name |
|-----|------------|-----------------------|-----------------------------------|--|--------|---|--------------------|---------------------------|-------------------|-------------------|
| 159 | Tom | Slukich | tom@nationalconductor.com | National Conductor Constructors | | 18119 Hwy 371 North Braiderd MN, 56401 United States | Electronic Service | | No | 22-416Official |
| 160 | Joel | Smith | jsmith@mnchippewatribe.org | Minnesota Chippewa Tribe | | PO Box 217 Cass Lake MN, 56633 United States | Electronic Service | | No | 22-416Official |
| 161 | Ken | Smith | ken.smith@districtenergy.com | District Energy St. Paul Inc. | | 76 W Kellogg Blvd St. Paul MN, 55102 United States | Electronic Service | | No | 22-416Official |
| 162 | Nizhoni | Smith | nizhoni.smith@lowersioux.com | Lower Sioux Indian Community | | PO Box 308 39527 Reservation Highway 1 Morton MN, 56270 United States | Electronic Service | | No | 22-416Official |
| 163 | Roger | Smith, Sr. | rogermsmithsr@fdlrez.com | | | 1720 Big Lake Road Cloquet MN, 55720 United States | Electronic Service | | No | 22-416Official |
| 164 | Adam | Sokolski | adam.sokolski@edf-re.com | EDF Renewable Energy | | 10 Second Street NE Ste 400 Minneapolis MN, 55410 United States | Electronic Service | | No | 22-416Official |
| 165 | Eugene | Sommers | eugene.sommers@whiteearth-nsn.gov | White Earth Nation | | PO BOX 418 White Earth MN, 56591 United States | Electronic Service | | No | 22-416Official |
| 166 | Peggy | Sorum | peggy.sorum@centerpointenergy.com | CenterPoint Energy | | 505 Nicollet Mall Minneapolis MN, 55402 United States | Electronic Service | | No | 22-416Official |
| 167 | Marie | Spry | mariespry@grandportage.com | | | PO Box 428 Grand Portage MN, 55605 United States | Electronic Service | | No | 22-416Official |
| 168 | Cheyenne | St. John | cheyanne.stjohn@lowersioux.com | Lower Sioux Tribal Community | | 39527 Reservation Hwy 1 Morton MN, 56270 United States | Electronic Service | | No | 22-416Official |
| 169 | LeRoy | Staples Fairbanks III | leroy.fairbanks@llojibwe.net | Leech Lake Band of Ojibwe | | 190 Sailstar Drive NW Cass Lake MN, 56633 United States | Electronic Service | | No | 22-416Official |
| 170 | Byron E. | Starns | byron.starns@stinson.com | STINSON LLP | | 50 S 6th St Ste 2600 Minneapolis MN, 55402 United States | Electronic Service | | No | 22-416Official |
| 171 | Kristin | Stastny | kstastny@taftlaw.com | Taft Stettinius & Hollister LLP | | 2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States | Electronic Service | | No | 22-416Official |
| 172 | Toby | Stephens | tobys@grandportage.com | Grand Portage Band of Lake Superior Chippewa | | PO BOX 428 Grand Portage MN, 55605 United States | Electronic Service | | No | 22-416Official |

| # | First Name | Last Name | Email | Organization | Agency | Address | Delivery Method | Alternate Delivery Method | View Trade Secret | Service List Name |
|-----|------------|------------|------------------------------------|------------------------------------|--------|---|--------------------|---------------------------|-------------------|-------------------|
| 173 | Cary | Stephenson | cstephenson@otpc.com | Otter Tail Power Company | | 215 South Cascade Street Fergus Falls MN, 56537 United States | Electronic Service | | No | 22-416Official |
| 174 | Mark | Strohfus | mstrohfus@greenergy.com | Great River Energy | | 12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States | Electronic Service | | No | 22-416Official |
| 175 | Carl | Stroh | cjsmg@sbcglobal.net | SBC Global | | 105 East Edgewood Ave Indianapolis IN, 46227 United States | Electronic Service | | No | 22-416Official |
| 176 | James M | Strommen | jstrommen@kennedy-graven.com | Kennedy & Graven, Chartered | | 150 S 5th St Ste 700 Minneapolis MN, 55402 United States | Electronic Service | | No | 22-416Official |
| 177 | Samuel | Strong | sam.strong@redlakenation.org | Red Lake Nation | | 15484 Migizi Drive Red Lake MN, 56671 United States | Electronic Service | | No | 22-416Official |
| 178 | Tom | Swafford | tswafford@umsi.us | Utility Mapping Services, Inc | | 3947 E Calvary Rd Suite 103 Duluth MN, 55803 United States | Electronic Service | | No | 22-416Official |
| 179 | Eric | Swanson | eswanson@winthrop.com | Winthrop & Weinstine | | 225 S 6th St Ste 3500 Capella Tower Minneapolis MN, 55402-4629 United States | Electronic Service | | No | 22-416Official |
| 180 | Todd | Tadych | ttadych@atcllc.com | American Transmission Company LLC | | 5303 Fen Oak Dr Madison WI, 53718 United States | Electronic Service | | No | 22-416Official |
| 181 | Camille | Tanhoff | kamip@uppersiouxcommunity-nsn.gov | Upper Sioux Community | | 5722 Travers Lane PO BOX 147 Granite Falls MN, 56241 United States | Electronic Service | | No | 22-416Official |
| 182 | Stuart | Tommerdahl | stommerdahl@otpc.com | Otter Tail Power Company | | 215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States | Electronic Service | | No | 22-416Official |
| 183 | Jayne | Trusty | execdir@swrdc.org | SWRDC | | 2401 Broadway Ave #1 Slayton MN, 56172 United States | Electronic Service | | No | 22-416Official |
| 184 | Caralyn | Trutna | carrie@uppersiouxcommunity-nsn.gov | Upper Sioux Community | | Upper Sioux Community P.O. Box 147 Granite Falls MN, 55372 United States | Electronic Service | | No | 22-416Official |
| 185 | Jen | Tyler | tyler,jennifer@epa.gov | US Environmental Protection Agency | | Environmental Planning & Evaluation Unit 77 W Jackson Blvd. Mailstop B-19J | Electronic Service | | No | 22-416Official |

| # | First Name | Last Name | Email | Organization | Agency | Address | Delivery Method | Alternate Delivery Method | View Trade Secret | Service List Name |
|-----|------------|--------------|------------------------------------|---|---------------------------------|---|--------------------|---------------------------|-------------------|-------------------|
| | | | | | | Chicago IL, 60604-3590 United States | | | | |
| 186 | Kodi | Verhalen | kverhalen@taftlaw.com | Taft Stettinius & Hollister LLP | | 80 S 8th St Ste 2200 Minneapolis MN, 55402 United States | Electronic Service | | No | 22-416Official |
| 187 | Leonard | Wabasha | leonard.wabasha@shakopeedakota.org | Shakopee Mdwakanton Sioux Community | | 2300 Tiwahe Circle Shakopee MN, 55379 United States | Electronic Service | | No | 22-416Official |
| 188 | Haley | Waller Pitts | hwallerpitts@fredlaw.com | Fredrikson & Byron, P.A. | | 60 S Sixth St Ste 1500 Minneapolis MN, 55402-4400 United States | Electronic Service | | No | 22-416Official |
| 189 | Caren | Warner | caren.warner@state.mn.us | | Department of Commerce | 85 7th Place East Suite 280 St. Paul MN, 55101-2198 United States | Electronic Service | | No | 22-416Official |
| 190 | Luke | Warnsholz | lwarnsholz@boisforte-nsn.gov | Bois Forte Band of Chippewa | | Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States | Electronic Service | | No | 22-416Official |
| 191 | Cynthia | Warzecha | cynthia.warzecha@state.mn.us | Minnesota Department of Natural Resources | | 500 Lafayette Road Box 25 St. Paul MN, 55155-4040 United States | Electronic Service | | No | 22-416Official |
| 192 | Elizabeth | Wefel | eawefel@flaherty-hood.com | Missouri River Energy Services | | 525 Park St Ste 470 Saint Paul MN, 55103 United States | Electronic Service | | No | 22-416Official |
| 193 | Heather | Westra | heather.westra@piic.org | Prairie Island Indian Community | | 5636 Sturgeon Lake Rd Welch MN, 55089 United States | Electronic Service | | No | 22-416Official |
| 194 | Alan | Whipple | sa.property@state.mn.us | | Minnesota Department Of Revenue | Property Tax Division 600 N. Robert Street St. Paul MN, 55146-3340 United States | Electronic Service | | No | 22-416Official |
| 195 | Deanna | White | mncwa@cleanwater.org | Clean Water Action & Water Fund of MN | | 330 S 2nd Ave Ste 420 Minneapolis MN, 55401 United States | Electronic Service | | No | 22-416Official |
| 196 | Noah | White | noah.white@piic.org | Prairie Island Indian Community | | 5636 Sturgeon Lake Road Welch MN, 55089 United States | Electronic Service | | No | 22-416Official |
| 197 | Steve | White | steve.white@llojibwe.net | Leech Lake Band of Ojibwe | | 190 Sailstar Drive NW Cass Lake MN, 56633 United States | Electronic Service | | No | 22-416Official |
| 198 | Cody | Whitebear | cody.whitebear@piic.org | Prairie Island Indian Community | | 5636 Sturgeon Lake Road Welch MN, | Electronic Service | | No | 22-416Official |

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|-----|------------|-----------|--------------------------------|--|---------------------------|---|--------------------|---------------------------|-------------------|-------------------|
| | | | | | | 55089 United States | | | | |
| 199 | Mike | Wilson | mike.wilson@millelacsband.com | Mille Lacs Band of Ojibwe | | 43408 Oodena Dr Onamia MN, 56359 United States | Electronic Service | | No | 22-416Official |
| 200 | Virgil | Wind | virgil.wind@millelacsband.com | Mille Lacs Band of Ojibwe | | 43408 Oodena Drive Onamia MN, 56359 United States | Electronic Service | | No | 22-416Official |
| 201 | Joseph | Windler | jwindler@winthrop.com | Winthrop & Weinstine | | 225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States | Electronic Service | | No | 22-416Official |
| 202 | Jonathan | Wolfgram | jonathan.wolfgram@state.mn.us | | Office of Pipeline Safety | 445 Minnesota St Ste 147 Woodbury MN, 55125 United States | Electronic Service | | No | 22-416Official |
| 203 | Laurie | York | laurie.york@whiteearth-nsn.gov | White Earth Reservation Business Committee | | PO Box 418 White Earth MN, 56591 United States | Electronic Service | | No | 22-416Official |
| 204 | Kurt | Zimmerman | kwz@ibew160.org | Local Union #160, IBEW | | 2909 Anthony Ln St Anthony Village MN, 55418-3238 United States | Electronic Service | | No | 22-416Official |
| 205 | Patrick | Zomer | pat.zomer@lawmoss.com | Moss & Barnett PA | | 150 S 5th St #1200 Minneapolis MN, 55402 United States | Electronic Service | | No | 22-416Official |