

December 23, 2025

VIA EFILING

Sasha Bergman
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, MN 55101-2147

**Re: In the Matter of the Application for a Route Permit for a 115-kV Laketown
Transmission Line and Associated Facilities Project in Carver County, Minnesota**

**MPUC Docket No. ET-2/TL-24-132
CAH Docket No. 21-2500-40445**

Dear Ms. Bergman:

Great River Energy submits the attached Reply Comments, in the above-referenced docket. A copy of this filing is also being served as designated on the Official Service List on file with the Minnesota Public Utilities Commission.

Please let me know if you have any questions regarding this filing.

Sincerely,

FREDRIKSON & BYRON, P.A.

/s/ Haley L. Waller Pitts

Haley L. Waller Pitts
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**STATE OF MINNESOTA
BEFORE THE
PUBLIC UTILITIES COMMISSION**

Katie Sieben
Hwikwon Ham
Audrey C. Partridge
Joseph K. Sullivan
John A. Tuma

Chair
Commissioner
Commissioner
Commissioner
Commissioner

**In the Matter of the Application for a
Route Permit Application for the
Laketown 115-kV Transmission Line in
Carver County, Minnesota**

Docket No. ET2/TL-24-132
CAH Docket No. 21-2500-40445

REPLY COMMENTS

INTRODUCTION

Great River Energy submits these reply comments in accordance with the Minnesota Public Utilities Commission's (Commission) November 17, 2025, Notice of Comment Period on Independent Consultant Report and for Additional Record Development (Notice). The Project is a less than 5-mile long 115 kilovolt (kV) transmission line that is needed to serve local load. Although the Proposed Route offers reliability benefits as compared to Route Alternative B, the further record development in this matter has demonstrated that interested members of the public almost universally support Route Alternative B as compared to the Proposed Route. In addition, considering member input, the local cooperative (Minnesota Valley Electric Cooperative (MVEC), a co-applicant in this proceeding) has recently expressed support for Route Alternative B. Because both routes serve the immediate need for the Project, Great River Energy requests a route permit for Route Alternative B.

BACKGROUND

During the Initial Comment Period, comments were submitted by:

- City of Carver;¹
- City of Victoria;²
- United States Fish and Wildlife Service (USFWS);³
- Northern States Power Company d/b/a Xcel Energy (Xcel Energy);⁴ and
- Fifteen members of the public, including Bruce Meuleners, David Sorrentino, Deb Erickson, Jeff Thompson, Jim Holasek, Peter Nordang, Carla Gestach, Stephen Gestach, Trudy Vogel,⁵ Russell Schlegelmilch,⁶ Jo Eiden,⁷ Anthony Schuster,⁸ Patty Eiden,⁹ and Greg Boe,¹⁰ and Don Schlegelmilch.¹¹

Great River Energy responds to topics raised in these comments below. As an initial matter, and as noted above, this Project is needed to serve increasing local load. When developing this Project, Great River Energy staff applied their expertise, incorporated input and feedback from stakeholders, applied the Commission's routing criteria, and designed a Project which Great River Energy determined met the load serving need consistent with statutory requirements and with additional reliability benefits. Great River Energy understands that some commenters do not support the Proposed Route and acknowledges that, as in any energy infrastructure project, there are trade-offs depending on which route is selected. Based on the further public involvement in this docket, those trade-offs now appear to weigh in favor of Route Alternative B. Regardless of

¹ City of Carver Comments (Dec. 17, 2025) (eDocket No. [202512-225951-01](#)).

² City of Victoria Comments (Dec. 8, 2025) (eDocket No. [202512-225603-01](#)).

³ USFWS Comments (Dec. 15, 2025) (eDocket No. [202512-225823-01](#)).

⁴ Xcel Energy Comments (Dec. 15, 2025) (eDocket No. [202512-225858-01](#)). These comments reference a switch structure. For purposes of clarity, an in- and out-configuration is currently planned, regardless of route selected.

⁵ Public Comments Batch 1 (Dec. 16, 2025) (eDocket No. [202512-225923-01](#)).

⁶ Russell Schlegelmilch Comment (Dec. 17, 2025) (eDocket No. [202512-225936-01](#)).

⁷ Jo Eiden Comment (Dec. 17, 2025) (eDocket No. [202512-225940-01](#)).

⁸ Anthony Schuster Comment (Dec. 17, 2025) (eDocket No. [202512-225949-01](#)).

⁹ Patty Eiden Comment (Dec. 17, 2025) (eDocket No. [202512-225950-01](#)).

¹⁰ Greg Boe Comment (Dec. 17, 2025) (eDocket No. [202512-225952-01](#)).

¹¹ Don Schlegelmilch Comment (Dec. 18, 2025) (eDocket No. [202512-225996-01](#)).

the route selected by the Commission, Great River Energy will construct the Project because it is needed to serve local load.

I. REPLY COMMENTS

A. Following Existing Rights-of-Way.

Some comments support Route Alternative B because it follows more existing rights-of-way than the Proposed Route.¹² Route Alternative B follows existing utility or road right-of-way for a higher percentage of its length than the Proposed Route (94 percent vs 53.5 percent).¹³ The Proposed Route deviates from existing right-of-way to increase distance from residences, in which case it then follows parcel lines.

B. Environmental Considerations.

Several comments raise concerns regarding the Project's environmental and human impact, including land use/future zoning, wetlands, property values, and agricultural impacts, generally in support of Route Alternative B.¹⁴ The Department of Commerce, Energy Environmental Analysis Review unit (EERA) studied these impacts for each route option in the environmental assessment (EA). The Commission's October 2025 Order concluded that the EA and the record created at the public hearing address the issues identified in the Scoping Decision, except as the EA relates to the details on the reliability concerns of Route Alternative B as compared to the Proposed Route.¹⁵ A supplemental Appendix C to the EA was filed on October

¹² Public Comments Batch 1 (Dec. 16, 2025) (eDocket No. [202512-225923-01](#)); Russell Schlegelmilch Comment (Dec. 17, 2025) (eDocket No. [202512-225936-01](#)); Anthony Schuster Comment (Dec. 17, 2025) (eDocket No. [202512-225949-01](#)); Patty Eiden Comment (Dec. 17, 2025) (eDocket No. [202512-225950-01](#)); Greg Boe Comment (Dec. 17, 2025) (eDocket No. [202512-225952-01](#)); City of Carver Comment (Dec. 17, 2025) (eDocket No. [202512-225951-01](#)); Don Schlegelmilch Comment (Dec. 18, 2025) (eDocket No. [202512-225996-01](#)).

¹³ Ex. Ex. EERA-11 at 26 (EA).

¹⁴ Anthony Schuster Comment (Dec. 17, 2025) (eDocket No. [202512-225949-01](#)); Patty Eiden Comment (Dec. 17, 2025) (eDocket No. [202512-225950-01](#)); City of Carver Comment (Dec. 17, 2025) (eDocket No. [202512-225951-01](#)); Greg Boe Comment (Dec. 17, 2025) (eDocket No. [202512-225952-01](#)); Public Comments Batch 1 (Dec. 16, 2025) (eDocket No. [202512-225923-01](#)).

¹⁵ Order Adopting Administrative Law Judge Report as Modified, Requiring Additional Record Development, and Remanding for Further Proceedings (Oct. 2, 2025) (eDocket No. [202510-223519-01](#)).

28, 2025.¹⁶ The EA analyzes these considerations and the measures the Applicants will employ to minimize these impacts. In general, anticipated impacts are consistent with those of a short 115-kV transmission line, and Great River Energy will implement applicable avoidance and minimization measures regardless of which route the Commission selects.

C. Reliability Considerations.

Multiple comments discuss the reliability of the Proposed Route compared to Route Alternative B.¹⁷ POWER Engineers drafted an Independent Report that is consistent with Great River Energy's own planning analysis and internal cost estimation.¹⁸ The analysis reflected in the Independent Report continues to be accurate. Reliability is one of multiple factors the Commission must consider when designating a route, and the Commission may determine that other factors weigh in favor of selecting Route Alternative B.

D. Ongoing Outreach and Coordination.

Some comments suggest that Great River Energy had not been engaged in stakeholder discussion and community outreach.¹⁹ Stakeholder outreach efforts, including in the time prior to filing the Route Permit Application, were summarized in Initial Comments and have been described in more detail elsewhere in this record.²⁰ Although Great River Energy understands that some stakeholders do not support the Proposed Route and/or the Project, that does not negate the substantial outreach that has occurred, and which will continue to occur on this and other projects.

¹⁶ EA Supplemental Appendix C (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)).

¹⁷ City of Carver Comments (Dec. 17, 2025) (eDocket No. [202512-225951-01](#)); Public Comments Batch 1 (Dec. 16, 2025) (eDocket No. [202512-225923-01](#)).

¹⁸ POWER Engineers Independent Review (Nov. 10, 2025) (eDocket No. [202511-224791-01](#)).

¹⁹ Anthony Schuster Comment (Dec. 17, 2025) (eDocket No. [202512-225949-01](#)); City of Carver Comment (Dec. 17, 2025) (eDocket No. [202512-225951-01](#)); Public Comments Batch 1 (Dec. 16, 2025) (eDocket No. [202512-225923-01](#)).

²⁰ See, e.g., Applicants' Initial Comments (Dec. 16, 2025) (eDocket No. [202512-225903-0](#)); Ex. APP-2 at 1-4-1-6(Application); Ex. APP-17 at 2 (Response to Scoping Comments); Ex. APP-21 at 13 (Comments regarding EA, with Attachments 1- 4); Applicants' Post-Hearing Comments at 7 (June 9, 2025) (eDocket No. 20256-219727-01); Applicants' Exceptions to Report at 7, 10 (July 30, 2025) (eDocket No. 20257-221553-01).

E. Route Alternative B Alignment.

The Notice also requested comments concerning the most appropriate alignment for Route Alternative B along Augusta Road. If the Commission selects Route Alternative B, Great River Energy submits that the most appropriate alignment is on the north side of Augusta Road. Although the alternative proposed during scoping and identified in the scoping decision placed the alignment on the south side of Augusta Road,²¹ an alignment on the north side of the road was included within the scope of the route width studied in the EA and would have the benefit of increasing distances from two residences on the south side of the road.²²

CONCLUSION

Great River Energy appreciates the comments and participation from stakeholders throughout this proceeding. As with any energy infrastructure project, there are multiple factors for the Commission to balance when designating a route. Here, the Proposed Route offers reliability benefits as compared to Route Alternative B, but commenter engagement in this record reflects that commenters generally prefer Route Alternative B. Great River Energy takes this engagement seriously, and Great River Energy understands that the Commission will also consider those concerns. If the Commission selects Route Alternative B, Great River Energy submits that an anticipated alignment on the north side of August Road is most appropriate.

²¹ Ex. EERA-6 (EA Scoping Decision).

²² See Ex. EERA-11 at Appendix D, Route Alternative B Maps 2 and 3 (EA, Maps).

Dated: December 23, 2025

Respectfully submitted,

s/ Haley Waller Pitts

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CERTIFICATE OF SERVICE

**MPUC Docket No. ET-2/TL-24-132
OAH Docket No. 21-2500-40445**

Breann L. Jurek certifies that on the 23rd day of December 2025, she e-filed on behalf of Great River Energy, a true and correct copy of the Reply Comments with the Minnesota Public Utilities Commission via eDockets (www.edockets.state.mn.us). Said document was also served on the Official Service List on file with the Minnesota Public Utilities Commission and as attached hereto.

Executed on: December 23, 2025

Signed: /s/ Breann L. Jurek

Fredrikson & Byron, P.A.

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14	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	Official CC Service List OAH
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