

December 27, 2024

VIA ELECTRONIC FILING

Mr. William Seuffert
Executive Secretary
Minnesota Public Utilities
Commission 1221 Seventh Place
East, Suite 350 Saint Paul, MN
55101-2147

Re: **In the Matter of the Application of Great River Energy, Otter Tail Power Co., Western Minnesota Municipal Power Agency, Agralite Electric Coop., and the City of Benson for a Certificate of Need and Route Permit for the Appleton to Benson 115 Kilovolt Transmission Line Project**
MPUC Docket Nos. ET-2,E-017,ET-6135, E-100/CN-24-263; TL-24-264

Dear Mr. Seuffert

Great River Energy, Otter Tail Power Company, Western Minnesota Municipal Power Agency, Agralite Electric Cooperative, and the City of Benson (together, the “Applicants”) are proposing to construct approximately 29 miles of new 115-kilovolt high voltage transmission line from the City of Appleton to the City of Benson in Swift County, Minnesota (the “Project”). Applicants respectfully submit their Joint Application for a Certificate of Need and a Route Permit (“Application”) to the Minnesota Public Utilities Commission (“Commission”). The Route Permit Application is submitted under the alternative permitting procedures of Minn. R. 7850.2800 to 7850.3900.

Enclosed for filing please find the Applicants’ Joint Application for the Project in Swift County, Minnesota, with public Appendices A-H, J, and L-N, and PUBLIC and NONPUBLIC versions of Appendices I, K, and O.

In accordance with Minnesota Rules, part 7829.0500, and Minnesota Statutes Chapter 13, Applicants have designated portions of Appendix I and Appendix O as **NONPUBLIC DATA–NOT FOR PUBLIC DISCLOSURE** because they contain confidential security information, as defined by Minn. Stat. § 13.37(1)(a). The public disclosure or use of this information creates an unacceptable risk of disruption to the electrical grid. Thus, Applicants maintain this information as nonpublic pursuant to Minn. Rule 7829.0500, subp. 3. Given the need to include nonpublic information, Applicants have prepared and are electronically filing both **NONPUBLIC** and public versions of Appendix I and Appendix O. Likewise, Applicants have designated portions of Appendix K as **NONPUBLIC DATA–NOT FOR PUBLIC DISCLOSURE** because it contains sensitive cultural resource information. The Minnesota State Historic Preservation Office Manual for Archaeological Projects in Minnesota provides for restricted access to sensitive cultural

December 27, 2024

Page 2

resource information. Given the need to include nonpublic information, Applicants have prepared and are electronically filing both **NONPUBLIC** and public versions of Appendix K.

The documents referenced above have also been electronically filed today through www.edockets.state.mn.us. Applicants are also providing two hard copies of the Application to the Minnesota Department of Commerce, Energy Environmental Review and Analysis (EERA) staff. Application fees will follow under separate cover. A copy of this filing is also being served upon the persons as designated on the Official Service List of record and the general service lists, as applicable.

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

Sincerely,

/s/ Haley Waller Pitts

Haley L. Waller Pitts

Direct Dial: 612.492.7443

Email: hwallerpitts@fredlaw.com

**Notice of Intent by Great River Energy,
Otter Tail Power Company, Western
Minnesota Municipal Power Agency,
Agralite Electric Cooperative, and the
City of Benson to Submit a Route Permit
Application under the Alternative
Permitting Process for the Appleton to
Benson Transmission Line Project in
Swift County, Minnesota.**

CERTIFICATE OF SERVICE

**MPUC Docket Nos. ET-2,E-017,ET-6135,
E-100/CN-24-263; TL-24-264**

Breann L. Jurek certifies that on the 27th day of December, 2024, she e-filed on behalf of Applicants, a true and correct copy of the following documents:

1. Applicants' Joint Application for a Certificate of Need and Route Permit for the Appleton to Benson 115 Kilovolt Transmission Line Project, including Figures, Public Appendices A-O and Nonpublic Appendices I, K, and O;
2. Notice of Application; and
3. Certificate of Service,

with the Minnesota Public Utilities Commission via eDockets (www.edockets.state.mn.us). Said documents were also served on the Official Service List of record and the general service lists, as applicable, on file with the Minnesota Public Utilities Commission and as attached hereto.

Executed on: December 27, 2024

Signed: /s/ Breann L. Jurek

Fredrikson & Byron, P.A.
60 South Sixth Street
Suite 1500
Minneapolis, MN 55402

#	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	24-263CN-24-263
2	Cody M.	Bauer	cbauer@fredlaw.com	Fredrikson & Byron, P.A.		60 South 6th Street, Suite 1500 Minneapolis MN, 55402 United States	Electronic Service		No	24-263CN-24-263
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	24-263CN-24-263
4	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	24-263CN-24-263
5	Thomas	Hoffman	thoffman@agralite.com	Agralite Electric Cooperative		320 Highway 12 SE Benson MN, 56215 United States	Electronic Service		No	24-263CN-24-263
6	Breann	Jurek	bjurek@fredlaw.com	Fredrikson & Byron PA		60 S Sixth St Ste 1500 Minneapolis MN, 55402 United States	Electronic Service		No	24-263CN-24-263
7	Kris	Koch	kkoch@otpc.com	Otter Tail Power Company		215 S. Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	24-263CN-24-263
8	Stephen	Kowal	skowal@bensonmnlaw.com	Wilcox Law Office, P.A.		1150 Wisconsin Avenue Benson MN, 56215 United States	Electronic Service		No	24-263CN-24-263
9	David C.	McLaughlin	dmclaughlin@fluegellaw.com	Western Minnesota Municipal Power Agency		129 2nd Street Ortonville MN, 56278 United States	Electronic Service		No	24-263CN-24-263
10	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	24-263CN-24-263
11	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	24-263CN-24-263
12	Mark	Strohufus	mstrohufus@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-263CN-24-263
13	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	24-263CN-24-263

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
14	Brian	Zavesky	brianz@mrenergy.com	Missouri River Energy Services		3724 West Avera Drive P.O. Box 88920 Sioux Falls SD, 57108-8920 United States	Electronic Service		No	24-263CN-24-263

#	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	24-264TL-24-264
2	Cody M.	Bauer	cbauer@fredlaw.com	Fredrikson & Byron, P.A.		60 South 6th Street, Suite 1500 Minneapolis MN, 55402 United States	Electronic Service		No	24-264TL-24-264
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	24-264TL-24-264
4	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	24-264TL-24-264
5	Thomas	Hoffman	thoffman@agralite.com	Agralite Electric Cooperative		320 Highway 12 SE Benson MN, 56215 United States	Electronic Service		No	24-264TL-24-264
6	Breann	Jurek	bjurek@fredlaw.com	Fredrikson & Byron PA		60 S Sixth St Ste 1500 Minneapolis MN, 55402 United States	Electronic Service		No	24-264TL-24-264
7	Kris	Koch	kkoch@otpc.com	Otter Tail Power Company		215 S. Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	24-264TL-24-264
8	Stephen	Kowal	skowal@bensonmnlaw.com	Wilcox Law Office, P.A.		1150 Wisconsin Avenue Benson MN, 56215 United States	Electronic Service		No	24-264TL-24-264
9	David C.	McLaughlin	dmclaughlin@fluegellaw.com	Western Minnesota Municipal Power Agency		129 2nd Street Ortonville MN, 56278 United States	Electronic Service		No	24-264TL-24-264
10	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	24-264TL-24-264
11	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	24-264TL-24-264
12	Mark	Strohufus	mstrohufus@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-264TL-24-264
13	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	24-264TL-24-264

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
14	Brian	Zavesky	brianz@mrenergy.com	Missouri River Energy Services		3724 West Avera Drive P.O. Box 88920 Sioux Falls SD, 57108-8920 United States	Electronic Service		No	24-264TL-24-264

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Jay	Anderson	jaya@cmpas.org	CMPAS		7550 Corporate Way Suite 100 Eden Prairie MN, 55344 United States	Electronic Service		No	PPSA General List
2	James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	PPSA General List
3	Melissa	Birch	mbirch@umn.edu	Clean Energy Resource Teams		null null, null United States	Electronic Service		No	PPSA General List
4	David	Birkholz	david.birkholz@state.mn.us	MN Department of Commerce		Suite 500 85 7th Place East St. Paul MN, 55101-2198 United States	Electronic Service		No	PPSA General List
5	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	PPSA General List
6	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	PPSA General List
7	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	PPSA General List
8	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	PPSA General List
9	Bill	Cook	bcook@rpu.org	Rochester Public Utilities		4000 East River Road NE Rochester MN, 55906 United States	Electronic Service		No	PPSA General List
10	John	Crane	johncranefishing@gmail.com	Fishing		1250 Wee Gwaus DR SW Bemidji MN, 56601 United States	Electronic Service		No	PPSA General List
11	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	PPSA General List
12	Thomas	Davis	atdavis1972@outlook.com	-		1161 50th Ave Sherburn MN, 56171 United States	Electronic Service		No	PPSA General List
13	Mike	DellaPenna	mdellapenna@google.com			null null, null United States	Electronic Service		No	PPSA General List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
14	John	Drawz	jdrawz@fredlaw.com	Fredrikson & Byron, P.A.		Suite 1500 60 South Sixth Street Minneapolis MN, 55402-4400 United States	Electronic Service		No	PPSA General List
15	Cory	Dutcher	cory.dutcher@ge.com	GE Power and Water		1 River Rd. Bldg. 37-413 Schenectady NY, 12345 United States	Electronic Service		No	PPSA General List
16	Kristen	Eide Tollefson	healingsystems69@gmail.com	R-CURE		28477 N Lake Ave Frontenac MN, 55026-1044 United States	Electronic Service		No	PPSA General List
17	Karen A	Gebhardt	kageb1@gvtel.com			43901 253rd Ave Leonard MN, 56652-4026 United States	Electronic Service		No	PPSA General List
18	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	PPSA General List
19	Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S. Eighth Street Minneapolis MN, 55402 United States	Electronic Service		No	PPSA General List
20	Scott	Johnson	scott.johnson@ci.medina.mn.us	City of Medina		2052 County Road 24 Medina MN, 55340-9790 United States	Electronic Service		No	PPSA General List
21	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	PPSA General List
22	Tom	Karas	tomskaras@gmail.com			3171 309th Ave NW Cambridge MN, 55008 United States	Electronic Service		No	PPSA General List
23	Bruce	King	brenda@ranww.org	Realtors, Association of Northwestern WI		Suite 3 1903 Keith Street Eau Claire WI, 54701 United States	Electronic Service		No	PPSA General List
24	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	PPSA General List
25	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	PPSA General List
26	Colleen	Mueller				22186 State Hwy 4 Paynesville MN, 56362 United States	Paper Service		No	PPSA General List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
27	Dan	Nelson	dan.nelson@isginc.com	I&S Group		115 E Hickory St Ste 300 Mankato MN, 56001 United States	Electronic Service		No	PPSA General List
28	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	PPSA General List
29	Shantal	Pai	spai@fredlaw.com	Fredrikson and Byron, P.A.		60 South Sixth Street Suite 1500 Minneapolis MN, 55402 United States	Electronic Service		No	PPSA General List
30	Kevin	Peterson	kjp@ibew160.org			1109 Northway Lane NE Rochester MN, 55906 United States	Electronic Service		No	PPSA General List
31	Angela	Piner	angela.piner@hdrinc.com	HDR, Inc.		Suite 600 701 Xenia Avenue South Suite 600 Minneapolis MN, 55416 United States	Electronic Service		No	PPSA General List
32	Larry	Rebman	larryemls@hotmail.com	EMLS, Inc		PO Box 122 Appleton MN, 56208 United States	Electronic Service		No	PPSA General List
33	Margaret	Rheude	margaret_rheude@fws.gov	U.S. Fish and Wildlife Service		Twin Cities Ecological Services Field Office 4101 American Blvd. E. Bloomington MN, 55425 United States	Electronic Service		No	PPSA General List
34	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 7 Minneapolis MN, 55401-1993 United States	Electronic Service		No	PPSA General List
35	Tom	Slukich	tom@nationalconductor.com	National Conductor Constructors		18119 Hwy 371 North Braiderd MN, 56401 United States	Electronic Service		No	PPSA General List
36	Adam	Sokolski	adam.sokolski@edf-re.com	EDF Renewable Energy		10 Second Street NE Ste 400 Minneapolis MN, 55410 United States	Electronic Service		No	PPSA General List
37	Brent	Stavig	brentstavig@gmail.com			8961 490th St. Rush City MN, 55069 United States	Electronic Service		No	PPSA General List
38	Mark	Strohufus	mstrohufus@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	PPSA General List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
39	Carl	Strohm	cjsmg@sbcglobal.net	SBC Global		105 East Edgewood Ave Indianapolis IN, 46227 United States	Electronic Service		No	PPSA General List
40	Tom	Swafford	tswafford@umsi.us	Utility Mapping Services, Inc		3947 E Calvary Rd Suite 103 Duluth MN, 55803 United States	Electronic Service		No	PPSA General List
41	Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine		225 S 6th St Ste 3500 Capella Tower Minneapolis MN, 55402-4629 United States	Electronic Service		No	PPSA General List
42	Todd	Tadych	ttadych@atcllc.com	American Transmission Company LLC		5303 Fen Oak Dr Madison WI, 53718 United States	Electronic Service		No	PPSA General List
43	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	PPSA General List
44	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	PPSA General List
45	Elizabeth	Wefel	eawefel@flaherty-hood.com	Missouri River Energy Services		525 Park St Ste 470 Saint Paul MN, 55103 United States	Electronic Service		No	PPSA General List
46	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	PPSA General List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	David	Bell	david.bell@state.mn.us		Department of Health	POB 64975 St. Paul MN, 55164 United States	Electronic Service		No	Agency Reps
2	Water Programs	Coordinator	waterprograms.bwsr@state.mn.us		Minnesota Board of Water and Soil Resources	520 Lafayette Road N St. Paul MN, 55155 United States	Electronic Service		No	Agency Reps
3	Kate	Fairman	kate.fairman@state.mn.us		Department of Natural Resources	Box 32 500 Lafayette Rd St. Paul MN, 55155-4032 United States	Electronic Service		No	Agency Reps
4	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	Agency Reps
5	Chris	Green	chris.green@state.mn.us	Minnesota Pollution Control Agency		504 Fairgrounds Rd Suite 200 Marshall MN, 56258 United States	Electronic Service		No	Agency Reps
6	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	Agency Reps
7	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	Agency Reps
8	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	Agency Reps
9	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	Agency Reps
10	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	Agency Reps
11	Jayme	Trusty	execdir@swrdc.org	SWRDC		2401 Broadway Ave #1 Slayton MN, 56172 United States	Electronic Service		No	Agency Reps
12	Jen	Tyler	tyler.jennifer@epa.gov	US Environmental Protection Agency		Environmental Planning & Evaluation Unit 77 W Jackson Blvd. Mailstop B-19J Chicago IL,	Electronic Service		No	Agency Reps

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						60604-3590 United States				
13	Isaac	Weston	isaac.weston@state.mn.us			null null, null United States	Electronic Service		No	Agency Reps
14	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	Agency Reps
15	Jonathan	Wolfgram	jonathan.wolfgram@state.mn.us		Office of Pipeline Safety	445 Minnesota St Ste 147 Woodbury MN, 55125 United States	Electronic Service		No	Agency Reps