

December 29, 2025

VIA eFILING

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

**Re: *Completeness Supplemental Comments*
In Matter of the Application of Big Bend Wind, LLC and Great River Energy for a
Route Permit for a 161-kV high voltage transmission line and associated facilities in
Martin County**

MPUC Docket No. IP7013/TL-25-389

Dear Ms. Bergman:

Big Bend Wind, LLC (Big Bend) and Great River Energy (GRE) (collectively, the Applicants) submit these supplemental comments regarding the completeness of its Application for a Route Permit (Application) for a 161 kilovolt (kV) high voltage transmission line (HVTL) and associated facilities in Martin County, Minnesota (Project), in the above-captioned docket.

The Minnesota Public Utilities Commission (Commission or PUC) issued an Application Completeness Determination Letter on December 24, 2025.¹ The Letter stated that the Commission Energy Infrastructure Permitting (EIP) Staff found the Application largely satisfies the Application content requirements of Minnesota Statutes § 216I.05, but requested a supplemental filing containing additional review and analysis of the Project's potential impacts on property values and possible mitigation measures that could be utilized to avoid or minimize the Project's potential impacts to property values.

As discussed on page 57 of the Application, property value impacts from transmission lines are difficult to measure because of the multiple factors that can impact a property's value. While potential impacts vary, HVTLs generally have "no significant impact or a slight negative impact on residential properties."²

¹ See Letter on Application Completeness Determination (December 24, 2025) (eDocket No. 202512-226198-01).

² Pitts, Jennifer M. and Jackson, Thomas O, PhD, MA1. 2024. Power Lines and Property Values Revisited. The Appraisal Journal, Fall 2024. Available online at: <https://rpa-inc.com/wp-content/uploads/2020/03/Power-Lines-and-Property-Values-Revisited.pdf>. Accessed September 2025.).

The impact on property values from the presence of a HVTL is influenced by a complex interaction of factors. Most of these factors are parcel-specific: condition, size, improvements, acreage, and neighborhood characteristics; the proximity to schools, parks, and other amenities; and the presence of existing infrastructure (e.g., highways, railways, power lines). In addition to property-specific factors, local and national market trends, as well as interest rates can affect all three measures. Thus, impacts from HVTLs on property values depend upon “many factors, including market condition, location, and personal preference.”³ The presence of a HVTL becomes one of many interacting factors that could affect a specific property value.

As noted in Table 7 of the Application, the region of influence for property values is the Local Vicinity. Impacts to property values could occur; however, specific changes to a property’s value are difficult to predict. Impacts, if they occur, are expected to decrease over time. Property value impacts fall off rapidly with distance; therefore, impacts are anticipated to be localized. Long-term impacts might or might not occur.

Impacts on property values can be mitigated by reducing aesthetic impacts and encumbrances to future land use. Collocating the transmission line with existing infrastructure may reduce aesthetic impacts and potential land use conflicts, and landowners will be compensated for any easements. The Extension Project is collocated with existing roadways, and landowners have signed voluntary easements for 100% of the proposed route. In addition, the 2025 Sample Route Permit contains a number of standard conditions that may help mitigate aesthetic impacts and future land use encumbrances, which may mitigate potential property values impacts. These standard conditions include:

- Section 5.3.7 - Aesthetics. This condition requires the Applicants to consider landowner input when placing structures and preserving the natural landscape to the extent possible by not unnecessarily destroying the natural surroundings. Additionally, transmission structures shall be placed to minimize the loss of agricultural land, forests and wetlands, and to avoid homes and farmsteads, among other conditions.⁴
- Section 5.3.10 - Vegetation Management. This condition requires Applicants to 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.⁵

³ *Id.*

⁴ Application at 35 (December 10, 2025) (eDockets No. 202512-225711-02); Appendix J at 5-6 (December 10, 2025) (eDockets No. 202512-225711-13).

⁵ Appendix J at 7 (December 10, 2025) (eDockets No. 202512-225711-13).

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- Section 5.3.8 – Soil Erosion and Sediment Control – This condition requires the Applicants to 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.⁶
- Section 5.3.19 – Cleanup – This condition requires the Applicants to 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.⁷

The Applicants do not propose additional mitigative measures specific to property values.

With this additional information regarding potential impacts and mitigation related to property values, the Applicants respectfully request that the Commission accept the Application as substantially complete.

These supplemental completeness comments have been e-filed through www.edocket.state.mn.us. A copy of this filing is also being served upon the persons on the Official Service List of record.

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

Sincerely,

FREDRIKSON & BYRON, P.A.

A handwritten signature in black ink, appearing to read 'CKB', with a long horizontal flourish extending to the right.

Christina K. Brusven

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⁶ Appendix J at 10 (December 10, 2025) (eDockets No. 202512-225711-13).

⁷ Appendix J at 10 (December 10, 2025) (eDockets No. 202512-225711-13).

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CERTIFICATE OF SERVICE

Maia Martinez certifies that on the 29th day of December, 2025, she e-filed true and correct copy of the Completeness Supplemental Comments on behalf of Big Bend Wind, LLC and Great River Energy via eDockets (www.edockets.state.mn.us):

Said documents were also served as designated on the Official Service Lists on file with the Minnesota Public Utilities Commission and as attached hereto.

Executed on: December 29, 2025

Signed: /s/ Maia Martinez

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	Brie	Anderson	brie.anderson@apexcleanenergy.com	Apex Clean Energy, Inc.		8665 Hudson Boulevard North, Suite 200 Lake Elmo MN, 55402 United States	Electronic Service		No	TL-25-389
2	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	TL-25-389
3	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		Yes	TL-25-389
4	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	TL-25-389
5	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	TL-25-389
6	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	TL-25-389
7	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	TL-25-389
8	Mark	Strohfus	mstrohfus@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	TL-25-389