

APPENDIX C

AGENCY COORESPONDENCE

Appendix C is organized as follows:

Table 1. Agency Mailing List

These are the individuals that were the primary addressees or copied on agency letters. All correspondence was sent via email.

Sample Letter

A single sample letter is provided. All unique letters are provided in the corresponding subsection. The U.S. Army Corps of Engineers received a unique letter.

Table 2. Agency Correspondence Archive

Provides a summary of correspondence sent and received.

Agency Correspondence

Provides correspondence sent to and received by agencies. Emails are provided; however, given a sample letter is included herein, individual letters are excluded.

Table 1. Agency Mailing List

Agency or Organization	Contact Name	Address	Email	Letter
Burlington Northern – Sante Fe Railway Company	Sean Jordan	2650 Lou Menk Dr; MOB2; Fort Worth, TX 76131	sean.jordan@jll.com	Primary addressee
East Otter Tail Soil and Water Conservation District	Darren Newville	801 Jenny Ave SW; Perham, MN 56573	darren.newville@eot.mnswcd.org	Primary addressee
Federal Aviation Administration	Marla Duchatellier	10101 Hillwood Parkway; Fort Worth, TX 76177	marla.duchatellier@faa.gov	Primary addressee
Federal Aviation Administration	Brian Oliver	N/A	brian.oliver@faa.gov	Copied
Minnesota Board of Water and Soil Resources	Water Program Coordinator	520 Lafayette RD N; St. Paul, MN 55155	waterprograms.bwsr@state.mn.us	Primary addressee
Minnesota Department of Agriculture	Stephan Roos	625 Robert St N; St. Paul, MN 55155	stephan.roos@state.mn.us	Primary addressee
Minnesota Department of Commerce	Chase Christopherson	85 7 th Place E, Ste 280; St. Paul, MN 55101	chase.christopherson@state.mn.us	Primary addressee
Minnesota Department of Health	David Bell	PO Box 64975; St. Paul, MN 55164	david.bell@state.mn.us	Primary addressee
Minnesota Department of Health	Dan Disrud	N/A	dan.disrud@state.mn.us	Copied
Minnesota Department of Health	Luke Pickman	N/A	luke.pickman@state.mn.us	Copied
Minnesota Department of Health	Dereck Richter	N/A	dereck.richter@state.mn.us	Copied
Minnesota Department of Health	Danielle Luzinski	N/A	danielle.luzinski@state.mn.us	Copied
Minnesota Department of Natural Resources	Kate Fairman	Box 32; 500 Lafayette Rd; St. Paul, MN 55155	kate.fairman@state.mn.us	Primary addressee
Minnesota Department of Natural Resources	Samantha Bump	Box 32; 500 Lafayette Rd; St. Paul, MN 55155	samantha.bump@state.mn.us	Primary addressee
Minnesota Department of Revenue	Alan Whipple	600 N Robert St; St. Paul, MN 55146	sa.property@state.mn.us	Primary addressee
Minnesota Department of Transportation	Stacy Kotch Egstad	395 John Ireland Blvd; St. Paul, MN 55155	stacy.kotch@state.mn.us	Primary addressee
Minnesota Indian Affairs Council	Shannon Geshick	161 St. Anthony Ave; Suite 919; St. Paul, MN 55103	shannon.geshick@state.mn.us	Primary addressee
Minnesota Indian Affairs Council	George J. Goggeye, Jr.	161 St. Anthony Ave; Suite 919; St. Paul, MN 55103	george.goggeye@state.mn.us	Primary addressee
Minnesota Office of Pipeline Safety	Jonathon Wolfgram	445 Minnesota St, Ste 147; Woodbury, MN 55125	jonathan.wolfgram@state.mn.us	Primary addressee
Minnesota Pollution Control Agency	Chris Green	504 Fairgrounds Rd; Suite 200; Marshall, MN 56258	chris.green@state.mn.us	Primary addressee
Minnesota State Historic Preservation Office				
Office of the State Archaeologist	Amanda Gronhovd	328 W. Kellogg Blvd; St. Paul, MN 55102	amanda.gronhovd@state.mn.us	Primary addressee
Otter Tail County	Krysten Foster	505 South Court St; Fergus Falls, MN 56537	hwy@ottertailcounty.gov; kfoster@ottertailcounty.gov	Primary addressee
Otter Tail County	Kevin Felbaum	505 South Court St; Fergus Falls, MN 56537	kfellbaum@ottertailcounty.gov	Primary addressee
Otter Tail County	Nicole Hansen	520 W Fir Ave; Fergus Falls, MN 56537	nhansen@ottertailcounty.gov	Primary addressee
Otter Tail County	Courtney Roth	540 W Fir Ave; Fergus Falls, MN 56537	croth@ottertailcounty.gov	Primary addressee

PUBLIC DOCUMENT - NOT PUBLIC DATA HAS BEEN EXCISED

Agency or Organization	Contact Name	Address	Email	Letter
Minnesota Board of Soil and Water Resources	Steve Hofstad	N/A	steve.hofstad@state.mn.us	Copied
Otter Tail County Board of Commissioners	Dan Bucholz	45227 N Little Pine Rd; Perham, MN 56573	dbucholz@ottertailcounty.gov	Primary addressee
Otter Tail County Board of Commissioners	Robert Lahman	12166 595th Ave; Fergus Falls, MN 56537	rlahman@ottertailcounty.gov	Primary addressee
Otter Tail County Historical Society	N/A	1110 West Lincoln; Fergus Falls, MN 56537	otchs@prtel.com	Primary addressee
Otto Township	Derek Geiser	50571 390th St; New York Mills, MN 56567	derek.geiser@arvig.com	Primary addressee
Otto Township	Troy Salo	48465 380 St; New York Mills, MN 56567	troy.salo@arvig.com	Primary addressee
Otto Township	Jordan Vaughan	34252 500th Ave; New York Mills, MN 56567	jordan@hci-mn.com	Primary addressee
Otto Township	Conrad Mack	37003 477th Ave; New York Mills, MN 56567	cjsmack@arvig.net	Copied
Otto Township	Jon Carlson	47308 371st St; New York Mills, MN 56567	carlson2426@gmail.com	Copied
Pine Lake Township	Pete Snortum	48584 428th St; Perham, MN 56573	N/A	Primary addressee
Pine Lake Township	Al Starzl	48356 428th St; Perham, MN 56573	N/A	Primary addressee
Pine Lake Township	Robert Sieling	41691 County Hwy 53; Perham, MN 56573	N/A	Primary addressee
Pine Lake Township	Susan Schmid	44331 Mosquito Heights Rd; Perham, MN 56573	N/A	Copied
Pine Lake Township	Kenneth Guck	44431 Mosquito Heights Rd; Perham, MN 56573	N/A	Copied
Southwest Regional Development Commission	Jayne Trusty	2401 Broadway Ave, #1; Slayton, MN 56172	execdir@swrdc.org	Primary addressee
U.S. Army Corps of Engineers (unique letter)	Benjamin Orne	332 Minnesota St; Suite E1500; St. Paul, MN 55101	benjamin.g.orne@usace.army.mil	Primary addressee
U.S. Department of Agriculture	Mitch Neitge	801 Jenney Ave; Perham, MN 56573	mitch.neitge@usda.gov	Primary addressee
U.S. Fish and Wildlife Service	Robert Tawes	3815 American Blvd E; Bloomington, MN 55425	robert_tawes@fws.gov	Primary addressee
West Central Initiative	N/A	PO Box 318; Fergus Falls, MN 56538	wci@wcif.org	Primary addressee



12300 Elm Creek Boulevard
Maple Grove, Minnesota 55369-4718
763-445-5000
greatriverenergy.com

May 12, 2025

[name]
[address]
[address]
[address]
[email]

**Subject: Great River Energy
Otto Tap 115 kV Transmission Line Project in Otter Tail County, Minnesota**

Dear [name]:

Great River Energy, wholesale electric provider to Lake Region Electric Cooperative (LREC), is planning to build approximately 2.9 miles of new 115-kilovolt (kV) high voltage transmission line (HVTL) in Otto and Pine Lake Townships, in Otter Tail County, referred to as the Otto Tap 115-kV Transmission Line Project (Project). Great River Energy intends to submit a Route Permit application to the Minnesota Public Utilities Commission for the Project in August 2025. Great River Energy anticipates starting construction in Spring/Fall 2028 and energizing the Project in 2028 after the receipt of all necessary approvals and authorizations.

As shown on the enclosed Fact Sheet, the Project will consist of a new tap line from Great River Energy's existing 115-kV Perham to Rush Lake transmission line to LREC's existing Otto Substation. By upgrading the Otto Substation with a new connection to the 115-kV transmission system, this Project will enable LREC to continue to provide reliable service to its customers in the region. The new 115-kV transmission line will be constructed and owned by Great River Energy.

The Project will primarily use direct-buried single-pole wood or steel structures. Larger laminate poles with guying or steel poles on concrete foundations may be needed for angles. Typical pole heights will range from 70 to 90 feet above ground and spans between poles will generally range from 350 to 400 feet. Final design, which will occur after the Minnesota Public Utilities Commission issues a Route Permit, will determine the final span distances, as well as the need for specialty poles (for example, laminate poles or steel poles on foundations). Construction will generally occur within a 100-foot-wide right-of-way (ROW) easement that Great River Energy will obtain to construct, operate and maintain the transmission line. The 100-foot-wide ROW easement will be centered on the transmission line and reach 50 feet on either side of the pole line.

[name]

May 12, 2025

Page 2

Great River Energy would appreciate any comments that you may have on the Project. Please contact me at 763-445-5210 or MStrohfus@GREnergy.com should you need additional information.

Sincerely,

GREAT RIVER ENERGY



Mark Strohfus

Project Manager, Transmission Permitting

Encl: Project Fact Sheet

cc: Andrew Levi, Merjent



GREAT RIVER ENERGY

Great River Energy
 12300 Elm Creek Blvd
 Maple Grove, MN 55369
 763-445-5000
 grenergy.com



Lake Region Electric Cooperative
 1401 S Broadway
 Pelican Rapids, MN 56572
 1800-552-7658
 lrec.coop

Otto Substation transmission tap line

Great River Energy, wholesale electric provider to Lake Region Electric Cooperative, is planning to build approximately 2.9 miles of new 115,000-volt (115-kilovolt or 115-kV) overhead transmission line in Otto and Pine Lake Townships, in Ottertail County. A transmission tap to the existing Perham–Rush Lake (LR-PR) 115-kV line is necessary to support Lake Region Electric Cooperative’s upgrade of the Otto Substation. This will ensure continued reliable service by connecting the new substation to the regional 115-kV transmission system.

Overview

This project will include the construction of approximately 2.9 miles of transmission line between the existing Otto Substation and Great River Energy’s existing LR-PR 115-kV transmission line located on the northeast side of US Highway 10. See map on back. From the Otto Substation, the proposed route would follow 470th Avenue north. At 410th Street it will turn east until it crosses over US Highway 10 to a new switch to be installed on the existing 115-kV line. LREC will likely bury most of their existing distribution lines where they are overtaken by the new 115-kV transmission line.

Permits

The project will require a route permit from the Minnesota Public Utilities Commission prior to any construction commencing. There will be several opportunities for any interested party to provide comments during the state’s permitting process.



Typical 115-kV single circuit structure and 115-kV deadend

In addition, Great River Energy will work with other state, county, townships and local authorities to acquire all approvals necessary to complete the work.

Public involvement and easements

Great River Energy will be contacting landowners to talk with them about the project. Easements will be needed to provide adequate land rights for construction, operation and maintenance of the new line.

Landowners will be presented with a copy of the route permit, easement and compensation settlement offer. Information will also be provided on the proposed design and pole locations, tree removal, construction access, settlement of damages and restoration of the right-of-way.

Schedule

Notifications	Winter 2024
Project permitting	2025 – Fall 2026
Survey/design	Winter 2027 – Winter 2028
Easements/ Environmental permits	Spring – Fall 2027
Transmission line construction	Fall 2027 – Fall 2028
Energization	Fall 2028

Quick facts

- Length** – Approximately 2.9 miles
- Voltage** – 115 kV
- Structures** – Direct-embedded wood or steel poles; steel on concrete foundations at corners
- Spans** – 350 to 400 feet apart
- Right of way** – 100-foot-wide (50 feet each side of center of pole line)

Table 2 Agency Correspondence Archive

Agency or Organization	Action	Description	Date
Burlington Northern – Sante Fe Railway Company	Correspondence sent	Introduction email, letter and factsheet (no response)	May 12, 2025
East Otter Tail Soil and Water Conservation District	Correspondence sent	Introduction email, letter and factsheet (no response)	May 12, 2025
Federal Aviation Administration	Correspondence sent	Introduction email, letter and factsheet	May 12, 2025
	Correspondence received	Utilize the Notice Criteria tool	May 12, 2025
	Correspondence received	No Hazard letter	September 9, 2025
Minnesota Board of Water and Soil Resources	Correspondence sent	Introduction email, letter and factsheet (no response)	May 12, 2025
	Correspondence sent	Introduction email, letter and factsheet (no response)	September 11, 2025
Minnesota Department of Agriculture	Correspondence sent	Introduction email, letter and factsheet	May 12, 2025
	Correspondence received	AIMP and induced voltage discussion	May 19, 2025
	Correspondence sent	Follow up on AIMP and induced voltage	July 14, 2025
	Correspondence sent	Follow up on July 14 email	October 3, 2025
	Correspondence sent	Additional follow up	October 8, 2025
	Correspondence received	No requirement for Ag Monitor from MDA	October 10, 2025
Minnesota Department of Commerce	Correspondence sent	Introduction email, letter and factsheet (no response)	September 11, 2025
Minnesota Department of Health	Correspondence sent	Introduction email, letter and factsheet (no response)	May 12, 2025
Minnesota Department of Natural Resources	Correspondence sent	Introduction email, letter and factsheet (no response)	May 12, 2025
Natural Heritage Review	Correspondence received	Natural Heritage Review	May 20, 2025
Minnesota Department of Revenue	Correspondence sent	Introduction email, letter and factsheet	September 11, 2025
	Correspondence received	Questions about nature of contact	September 12, 2025
	Correspondence sent	Answered questions	September 12, 2025
	Correspondence received	No concerns	September 12, 2025
Minnesota Department of Transportation	Correspondence sent	Introduction email, letter and factsheet	May 12, 2025
	Correspondence received	Reviewed materials; shared observations; requested meeting	May 30, 2025
	Correspondence sent	Accepted meeting request; scheduling	May 30, 2025
	Correspondence received	Meeting scheduling	June 2, 2025
	Meeting	Discussion of the Project	June 18, 2025
	Correspondence sent	Draft meeting notes	July 24, 2025
	Correspondence received	Comments on draft meeting notes; notes finalized	July 29, 2025

PUBLIC DOCUMENT - NOT PUBLIC DATA HAS BEEN EXCISED

Agency or Organization	Action	Description	Date
Minnesota Indian Affairs Council	Correspondence sent	Introduction email, letter and factsheet	May 12, 2025
	Correspondence received	Use MIAC review form	May 12, 2025
	Correspondence sent	Form sent to MIAC.culturalresources@state.mn.us (no response)	June 30, 2025
Minnesota Office of Pipeline Safety	Correspondence sent	Introduction email, letter and factsheet (no response)	September 11, 2025
Minnesota Pollution Control Agency	Correspondence sent	Introduction email, letter and factsheet	May 12, 2025
	Correspondence received	Look forward to reviewing associated EA	May 18, 2025
	Correspondence sent	Thank you	May 23, 2025
Minnesota State Historic Preservation Office	Correspondence sent	Phase Ia Cultural Assessment letter	June 24, 2025
	Correspondence received	Concurrence letter	August 1, 2025
Office of the State Archaeologist	Correspondence sent	Introduction email, letter and factsheet (no response)	May 12, 2025
Otter Tail County	Correspondence sent	Introduction email, letter and factsheet	May 12, 2025
	Correspondence received	Defer to staff on County Ditch 58	May 12, 2025
	Correspondence received	No issue so long as pole is not in ditch	May 13, 2025
	Correspondence sent	Thank you	May 13, 2025
	Correspondence sent	Additional information about typical pole locations	May 13, 2025
	Correspondence received	No county permit required	May 13, 2025
	Correspondence sent	Can stay outside of County Ditch 58	May 13, 2025
	Correspondence received	Township road contacts provided	May 13, 2025
	Correspondence received	County states no concerns	May 13, 2025
Minnesota Board of Soil and Water Resources	Correspondence sent	Introduction email, letter and factsheet (no response)	May 12, 2025
Otter Tail County Board of Commissioners	Correspondence sent	Introduction email, letter and factsheet (no response)	May 12, 2025
Otter Tail County Historical Society	Correspondence sent	Introduction email, letter and factsheet (no response)	May 12, 2025
Otto Township	Correspondence sent	Introduction email, letter and factsheet (no response)	May 12, 2025
Pine Lake Township	Correspondence sent	Introduction email, letter and factsheet (no response)	May 12, 2025
Southwest Regional Development Commission	Correspondence sent	Introduction email, letter and factsheet (no response)	May 12, 2025
U.S. Army Corps of Engineers (unique letter)	Correspondence sent	Introduction email, letter and factsheet	May 12, 2025
	Telephone call received	Question concerning timing	May 14, 2025
	Correspondence sent	Response to timing question	May 16, 2025
U.S. Department of Agriculture	Correspondence sent	Introduction email, letter and factsheet (no response)	May 12, 2025

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Agency or Organization	Action	Description	Date
U.S. Fish and Wildlife Service	Correspondence sent	Introduction email, letter and factsheet	May 12, 2025
	Correspondence received	Visit IPaC; bird diverters	May 13, 2025
	Correspondence sent	Thank you	May 14, 2025
Information for Planning and Consultation (IPaC)	Correspondence received	IPaC Species List	April 23, 2025
	Correspondence received	Determination Key	May 5, 2025
West Central Initiative	Correspondence sent	Introduction email, letter and factsheet (no response)	May 12, 2025

Burlington Northern – Sante Fe Railway Company

From: [Andrew Levi](#)
To: sean.jordan@jll.com
Cc: [Strohfus, Mark GRE-MG](#)
Subject: Great River Energy -- Otto Tap 115 kV Transmission Line Project
Date: Tuesday, May 13, 2025 12:19:00 PM
Attachments: [image001.png](#)
[Otto Tap Transmission Line Fact Sheet.pdf](#)
[GRE OttoTap_BNSF_Intro_Letter_Final.pdf](#)

Dear Sean Jordan,

Great River Energy is proposing to construct approximately 2.9 miles of new single-circuit, 115-kilovolt high voltage transmission line within Otto and Pine Lake Townships in Otter Tail County, Minnesota (the Project). As part of the Project, Great River Energy will upgrade the existing Lake Region Electric Cooperative-owned Otto Substation. More information about the Project, along with a map, is available in the attached letter and fact sheet.

Great River Energy is planning to submit a Route Permit Application to the Minnesota Public Utilities Commission in late summer of 2025. Great River Energy would appreciate any comments you might have about the Project. Please reach out to Mark Strohfus with Great River Energy at 763-445-5210 or MStrohfus@GREnergy.com with questions, written comments, or a request for a meeting.

Thank you,

Andrew Levi [on behalf of Mark Strohfus, Great River Energy]

Andrew Levi

612.354.4280 direct

612-246-8581 mobile

andrew.levi@merjent.com



1 Main Street SE, Suite 300

Minneapolis, MN 55414

612.746.3660 main

www.merjent.com

East Otter Tail Soil and Water Conservation District

From: [Andrew Levi](#)
To: darren.newville@eot.mnswcd.org
Cc: [Strohfus, Mark GRE-MG](#)
Subject: Great River Energy -- Otto Tap 115 kV Transmission Line Project
Date: Monday, May 12, 2025 11:04:00 AM
Attachments: [image001.png](#)
[Otto Tap Transmission Line Fact Sheet.pdf](#)
[GRE_OttoTap_EastOtterTailSoilandWtrConsDist_Intro_Letter_Final.pdf](#)

Dear Darren Newville,

Great River Energy is proposing to construct approximately 2.9 miles of new single-circuit, 115-kilovolt high voltage transmission line within Otto and Pine Lake Townships in Otter Tail County, Minnesota (the Project). As part of the Project, Great River Energy will upgrade the existing Lake Region Electric Cooperative-owned Otto Substation. More information about the Project, along with a map, is available in the attached letter and fact sheet.

Great River Energy is planning to submit a Route Permit Application to the Minnesota Public Utilities Commission in late summer of 2025. Great River Energy would appreciate any comments you might have about the Project. Please reach out to Mark Strohfus with Great River Energy at 763-445-5210 or MStrohfus@GREnergy.com with questions, written comments, or a request for a meeting.

Thank you,

Andrew Levi [on behalf of Mark Strohfus, Great River Energy]

Andrew Levi

612.354.4280 direct

612-246-8581 mobile

andrew.levi@merjent.com



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Federal Aviation Administration



Mail Processing Center
Federal Aviation Administration
Southwest Regional Office
Obstruction Evaluation Group
10101 Hillwood Parkway
Fort Worth, TX 76177

Aeronautical Study No.
2025-AGL-10494-OE

Issued Date: 09/04/2025

MARK STROHFUS
GREAT RIVER ENERGY
12300 Elm Creek Boulevard North
Maple Grove, MN 55369

**** DETERMINATION OF NO HAZARD TO AIR NAVIGATION ****

The Federal Aviation Administration has conducted an aeronautical study under the provisions of 49 U.S.C., Section 44718 and if applicable Title 14 of the Code of Federal Regulations, part 77, concerning:

Structure: Utility Pole Otto Tap new switch
County, State: Otter Tail, Minnesota

Collected Point(s):

Label	Latitude	Longitude	SE	DET AGL	AMSL
pt-1	46-33-26.17N	95-29-35.97W	1362 Ft	110 Ft	1472 Ft

In accordance with the provisions of 49 U.S.C., Section 44718 and as applicable Title 10 of the Code of Federal Regulations, part 183a, this aeronautical study was sent to the Military Aviation and Installation Assurance Clearinghouse established by the Secretary of Defense for review. The results of that review resulted in a finding of no risk to national security.

This aeronautical study revealed that the structure does not exceed obstruction standards and would not be a hazard to air navigation provided the following condition(s), if any, is(are) met:

It is required that FAA Form 7460-2, Notice of Actual Construction or Alteration, be e-filed any time the project is abandoned or:

- At least 10 days prior to start of construction (7460-2, Part 1)
- Within 5 days after the construction reaches its greatest height (7460-2, Part 2)

Based on this evaluation, marking and lighting are not necessary for aviation safety. However, if marking/lighting are accomplished on a voluntary basis, we recommend it be installed in accordance with FAA Advisory circular 70/7460-1 M Change 1.

This determination expires on 03/04/2027 unless:

- (a) the construction is started (not necessarily completed) and FAA Form 7460-2, Notice of Actual Construction or Alteration, is received by this office.
- (b) extended, revised, or terminated by the issuing office.

- (c) the construction is subject to the licensing authority of the Federal Communications Commission (FCC) and an application for a construction permit has been filed, as required by the FCC, within 6 months of the date of this determination. In such case, the determination expires on the date prescribed by the FCC for completion of construction, or the date the FCC denies the application.

NOTE: REQUEST FOR EXTENSION OF THE EFFECTIVE PERIOD OF THIS DETERMINATION MUST BE E-FILED AT LEAST 15 DAYS PRIOR TO THE EXPIRATION DATE. AFTER RE-EVALUATION OF CURRENT OPERATIONS IN THE AREA OF THE STRUCTURE TO DETERMINE THAT NO SIGNIFICANT AERONAUTICAL CHANGES HAVE OCCURRED, YOUR DETERMINATION MAY BE ELIGIBLE FOR ONE EXTENSION OF THE EFFECTIVE PERIOD.

This determination is based, in part, on the foregoing description which includes specific coordinates, heights, frequency(ies) and power. Any changes in coordinates, heights, and frequencies or use of greater power, except those frequencies specified in the Colo Void Clause Coalition; Antenna System Co-Location; Voluntary Best Practices, will void this determination. Any future construction or alteration, including increase to heights, power, or the addition of other transmitters, requires separate notice to the FAA. This determination includes all previously filed frequencies and power for this structure.

If construction or alteration is dismantled or destroyed, you must submit notice to the FAA within 5 days after the construction or alteration is dismantled or destroyed.

This determination does include temporary construction equipment such as cranes, derricks, etc., which may be used during actual construction of the structure. However, this equipment shall not exceed the overall heights as indicated above. Equipment which has a height greater than the studied structure requires separate notice to the FAA.

This determination concerns the effect of this structure on the safe and efficient use of navigable airspace by aircraft and does not relieve the sponsor of compliance responsibilities relating to any law, ordinance, or regulation of any Federal, State, or local government body.

A copy of this determination will be forwarded to the Federal Communications Commission (FCC) because the structure is subject to their licensing authority.

If we can be of further assistance, please contact our office at 1-817-222-5323, or Marla.Duchatellier@faa.gov. On any future correspondence concerning this matter, please refer to Aeronautical Study Number 2025-AGL-10494-OE.

Signature Control No: 670070037-675932337
marla.duchatellier@faa.gov
Technician

(DNE)

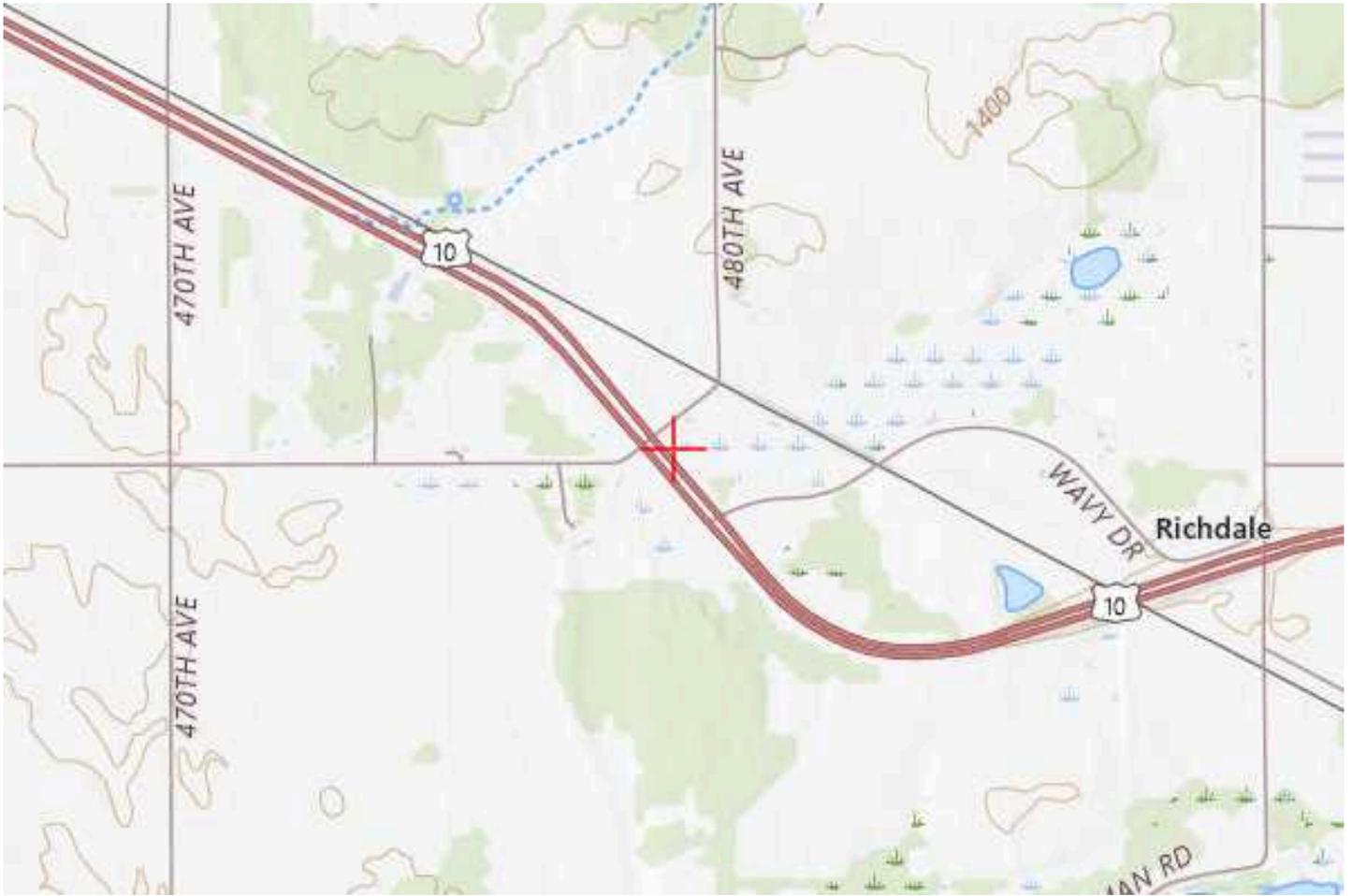
Attachment(s)
Frequency Data
Map(s)

cc: FCC

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Frequency Data for ASN 2025-AGL-10494-OE

LOW FREQUENCY	HIGH FREQUENCY	FREQUENCY UNIT	ERP	ERP UNIT
2496	2690	MHz	500	W





From: [Duchatellier, Marla \(FAA\)](#)
To: [Andrew Levi](#)
Cc: [Strohfus, Mark GRE-MG](#)
Subject: EXTERNAL: RE: Great River Energy -- Otto Tap 115 kV Transmission Line Project
Date: Monday, May 12, 2025 12:12:34 PM
Attachments: [image002.png](#)
[image003.png](#)

CAUTION: This email originated from outside of Merjent.

Hi Andrew,

The Notice Criteria Tool informs you if you have to e-file for a pole, crane and etc.

There are no fees associated with any part of an aeronautical study or obtaining a determination from the FAA.

Please click on the Notice Criteria link below to find out if you need to file.

<https://oeaaa.faa.gov/oeaaa/external/gisTools/gisAction.jsp?action=showNoNoticeRequiredToolForm>

Peace & Love,

Marla Duchatellier

OE Technician: Alabama, Arizona, Kansas, Minnesota, and Nebraska State
Obstruction Evaluation Group (OEG), AJV-A520

Office: 817-222-5323

Marla.Duchatellier@faa.gov

<https://oeaaa.faa.gov>



1) To see if your structure is required to file with FAA, please go to:

<https://oeaaa.faa.gov/oeaaa/external/gisTools/gisAction.jsp?action=showNoNoticeRequiredToolForm>

2) OEAAA.faa.gov Filing Instructions:

<https://oeaaa.faa.gov/oeaaa/external/content/instructions.jsp>

3) General FAQs: <https://oeaaa.faa.gov/oeaaa/external/searchAction.jsp?action=generalFAQs>

4) DOT/FAA Obstruction Marking & Lighting Advisory Circular (AC 70/7460-1M):

https://www.faa.gov/regulations_policies/advisory_circulars/index.cfm/go/document.information/documentID/1030047

5) Light Outage Reporting:

<https://oeaaa.faa.gov/oeaaa/external/content/lightOutageReporting.jsp>

6) Helpdesk (System Issues/Support): 202-580-7500/Email: oeaaa_helpdesk@cghtech.com

From: Andrew Levi <andrew.levi@merjent.com>
Sent: Monday, May 12, 2025 11:11 AM
To: Duchatellier, Marla (FAA) <Marla.Duchatellier@faa.gov>
Cc: Brian.Oliver@faa.gov; Strohfus, Mark GRE-MG <MStrohfu@GREnergy.com>
Subject: Great River Energy -- Otto Tap 115 kV Transmission Line Project

CAUTION: This email originated from outside of the Federal Aviation Administration (FAA). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Marla Duchatellier,

Great River Energy is proposing to construct approximately 2.9 miles of new single-circuit, 115-kilovolt high voltage transmission line within Otto and Pine Lake Townships in Otter Tail County, Minnesota (the Project). As part of the Project, Great River Energy will upgrade the existing Lake Region Electric Cooperative-owned Otto Substation. More information about the Project, along with a map, is available in the attached letter and fact sheet.

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Thank you,

Andrew Levi [on behalf of Mark Strohfus, Great River Energy]

Andrew Levi
612.354.4280 direct
andrew.levi@merjent.com



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612.746.3660 main
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Minnesota Board of Water and Soil Resources

From: [Andrew Levi](#)
To: waterprograms.bwsr@state.mn.us
Cc: [Strohfus, Mark GRE-MG](#)
Subject: Great River Energy Otto Tap 115 kV Transmission Line Project
Date: Thursday, September 11, 2025 2:01:00 PM
Attachments: [GRE_OttoTap_WaterProgramsCoordinator_20250910.pdf](#)
[image001.png](#)

Dear Water Programs Coordinator,

Great River Energy is proposing to construct approximately 2.9 miles of new single-circuit, 115- kilovolt high voltage transmission line within Otto and Pine Lake Townships in Otter Tail County, Minnesota (the Project). As part of the Project, Great River Energy will replace the existing Lake Region Electric Cooperative-owned Otto Substation. More information about the Project, along with a map, is available in the attached letter and fact sheet.

Great River Energy is planning to submit a Route Permit Application to the Minnesota Public Utilities Commission in late summer of 2025. Great River Energy would appreciate any comments you might have about the Project. Please reach out to Mark Strohfus with Great River Energy at 763-445-5210 or MStrohfus@GREnergy.com with questions, written comments, or a request for a meeting.

Thank you,

Andrew Levi [on behalf of Mark Strohfus, Great River Energy]

Andrew Levi

612.354.4280 direct

612-246-8581 mobile

andrew.levi@merjent.com



1 Main Street SE, Suite 300

Minneapolis, MN 55414

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Minnesota Department of Agriculture

From: [Roos, Stephan \(MDA\)](#)
To: [Strohfus, Mark GRE-MG](#)
Subject: RE: Otto Tap 115kV Transmission Line Project [MDA]
Date: Friday, October 10, 2025 1:51:23 PM
Attachments: [image007.png](#)
[image008.png](#)
[image009.png](#)
[image010.png](#)
[image011.png](#)
[image001.png](#)

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Sorry, I should have discussed the Ag Monitor requirement.

For the most part, the Ag/Environmental Monitor is becoming a legacy requirement. Over the last few years I've been working with PUC staff (formerly EERA staff) to streamline the monitoring process for projects. In the 'olden days' the ag monitor was often the only monitor required for the agricultural portions of projects and we built in the requirement due to cases where the construction teams got really sloppy and caused a lot of damage to ag fields (you can thank the pipeline contingent mostly).

It's become more standard that the PUC will require a third party monitor as a permit condition and I've worked with them to make sure that the monitors they require will have the proper qualifications to assess the work done on ag land. I made the case that we, wholistically, can define the scope of work thoroughly enough that a single environmental firm should be able to accomplish everything that needs oversight. Rather than each agency having their own monitor overlapping with other monitors at the same time on a construction site, a single firm under a monitoring contract can get appropriate staff to a site at the correct time. The idea is to simplify the process for project developers and make it more cost effective. All that said, I still require the language in an AIMP, mostly to remind PUC staff to arrange for a monitor with the right qualifications.

In the case of the Otto Tap project, I'm not sure if the PUC will require a third party monitor or a route permit for that matter. I'm not inclined to require a monitor specifically for MDA.

As we discussed earlier this week, I'm thinking that including the text from an AIMP in your project portfolio(?) would be adequate. You could leave the Ag/Environmental Monitor language out for the time being until I get a chance to talk to Suzanne on Tuesday. We should be able to get you clarification and a decision by that afternoon or Wednesday at the latest.

Hope this helps,

Steve

Steve Roos

Environmental Planner

Agricultural Marketing and Development Division

625 Robert Street North

Saint Paul, MN 55155-2538

O: 651-201-6631

C: 612-968-7208

From: [Strohfus, Mark GRE-MG](#)
To: [Roos, Stephan \(MDA\)](#)
Cc: [Andrew Levi](#)
Subject: EXTERNAL: RE: Otto Tap 115kV Transmission Line Project [MDA]
Date: Wednesday, October 8, 2025 11:12:18 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[MN Statutes 216B.243 AIMP.pdf](#)

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Hello Steve,

Thanks for the call this morning. Your explanations were very helpful.

I was able to find the legislation regarding AIMPs, which I have attached. The relevant parts are Subd. 2 and Subd. 7 (b), which I've highlighted below.

I'd like to point out that this statute only applies to projects that require a Certificate of Need from the PUC. Our proposed Otto 115kV line is not required to obtain a Certificate of Need under Mn Statutes 216B.243 Subd. 2 and Mn Statutes 216B.2421. As you mentioned during our call, MDA has historically focused on higher voltage lines than 115kV. These statutes somewhat explain why that was the case in that a 115kV line needs to have more than 10 miles of its length in MN. The Otto project is less than 10 miles in length.

I don't know that this necessarily changes your plans we discussed for moving forward on this project. I just thought that it might be some helpful background for you, and it will definitely be helpful to me for future projects I may work on.

Thanks Again!
Mark Strohfus
Project Manager – Transmission Permitting
Great River Energy
12300 Elm Creek Boulevard
Maple Grove, MN 55369
Direct: 763-445-5210 | Cell: 612-961-9820
www.GreatRiverEnergy.com

216B.243 CERTIFICATE OF NEED FOR LARGE ENERGY FACILITY.

....

Subd. 2. Certificate required.

No large energy facility shall be sited or constructed in Minnesota without the issuance of a certificate of need by the commission pursuant to sections [216C.05](#) to [216C.30](#) and this

section and consistent with the criteria for assessment of need. (emphasis added)

....

Subd. 7. **Participation by other agency or political subdivision.** (a) Other state agencies authorized to issue permits for siting, construction or operation of large energy facilities, and those state agencies authorized to participate in matters before the commission involving utility rates and adequacy of utility services, shall present their position regarding need and participate in the public hearing process prior to the issuance or denial of a certificate of need. Issuance or denial of certificates of need shall be the sole and exclusive prerogative of the commission and these determinations and certificates shall be binding upon other state departments and agencies, regional, county, and local governments and special purpose government districts except as provided in sections 116C.01 to 116C.08 and 116D.04, subdivision 9.

(b) An applicant for a certificate of need shall notify the commissioner of agriculture if the proposed project will impact cultivated agricultural land, as that term is defined in section 216G.01, subdivision 4. The commissioner may participate in any proceeding on the application and advise the commission as to whether to grant the certificate of need, and the best options for mitigating adverse impacts to agricultural lands if the certificate is granted. The Department of Agriculture shall be the lead agency on the development of any agricultural mitigation plan required for the project. (emphasis added)

A "large energy facility" is defined by

216B.2421 DEFINITION OF LARGE ENERGY FACILITY.

Subdivision 1. **Applicability.** The definition in this section applies to this section and sections 216B.2422 and 216B.243.

Subd. 2. **Large energy facility.** "Large energy facility" means:

(1) any electric power generating plant or combination of plants at a single site with a combined capacity of 50,000 kilowatts or more and transmission lines directly associated with the plant that are necessary to interconnect the plant to the transmission system;

(2) any high-voltage transmission line with a capacity of 300 kilovolts or more and greater than one mile in length in Minnesota;

(3) any high-voltage transmission line with a capacity of 100 kilovolts or more with more than ten miles of its length in Minnesota; (emphasis added)

From: Strohfus, Mark GRE-MG

Sent: Friday, October 3, 2025 8:24 AM

To: Roos, Stephan (MDA) <stephan.roos@state.mn.us>

Cc: andrew.levi@merjent.com

Subject: RE: Otto Tap 115kV Transmission Line Project [MDA]

Good Morning Steve,

I'm requesting affirmation from you that you don't think that an AIMP will be necessary for Otto Transmission line project in Perham and Pine Lake Township. See my recap of our conversation back in July below.

The PUC is asking for a response from you on this conversation in order for them to consider our Route Permit Application to be complete.

I realize that this conversation was a while ago, so please feel free to give me a call and I can quickly summarize the project for you.

Much Appreciated!

Mark Strohfus

Project Manager – Transmission Permitting

Great River Energy

12300 Elm Creek Boulevard

Maple Grove, MN 55369

Direct: 763-445-5210 | Cell: 612-961-9820

www.GreatRiverEnergy.com

From: Strohfus, Mark GRE-MG

Sent: Monday, July 14, 2025 8:52 AM

To: Roos, Stephan (MDA) <stephan.roos@state.mn.us>

Cc: andrew.levi@merjent.com

Subject: RE: Otto Tap 115kV Transmission Line Project [MDA]

Hello Steve,

Just reaching out to remind you of our telephone conversation a while back on this project and provide a status update.

We are proposing to construct the new transmission line typically about 5 feet outside of the road ROW to minimize potential impacts to the landowners along 470th Ave and 410th St.

We have three landowners with farming operations affected by our proposed project and have been having ongoing conversations with them about their irrigation systems. Those conversations have been going well.

Induced voltage is typically not a problem with 115kV transmission lines. In the rare event that a landowner was to experience induction on a fence, we would come out and fix the issue, typically with grounding. Electric fences are a little more involved but nevertheless are mitigable. However, I'm not aware of any ongoing livestock operations along the route.

Based on our conversation, you had thought that an AIMP would not be necessary. Please let us know at any time if you think we should in fact prepare one.

We anticipate filing our Route Permit Application with the Public Utilities Commission in August, and we're expecting them to hold a scoping and information meeting regarding the project in September.

If you have any additional questions, please feel free to reach out to me or Andrew.

Thanks,

Mark Strohfus

Project Manager – Transmission Permitting

Great River Energy

12300 Elm Creek Boulevard

Maple Grove, MN 55369

Direct: 763-445-5210 | Cell: 612-961-9820

www.GreatRiverEnergy.com

From: Roos, Stephan (MDA) <stephan.roos@state.mn.us>

Sent: Monday, May 19, 2025 2:39 PM

To: andrew.levi@merjent.com

Cc: Strohfus, Mark GRE-MG <MStrohfus@GREnergy.com>

Subject: Otto Tap 115kV Transmission Line Project [MDA]

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Hi Andrew,

Thank you for reaching out to me about the Otto Tap transmission line project. I'd be happy to work with you on the Agricultural Impact Mitigation Plan for the project. The majority of the route travels through irrigated agricultural land and the MDA and the PUC have become aware of concerns with transmission lines in proximity to irrigation equipment. Based on the aerial image of the proposed route you provided it looks as though you plan to use, or parallel, the ROW of 470th Ave. and 410th Street. If this is true there likely won't be problems with interfering with irrigation equipment operation. However, we're aware that induced voltage might be a concern and require additional grounding of nearby irrigation systems. I'm not sure to the extent of this potential problem for lower voltage transmission lines such as the 115kV line you're proposing, but I'm happy to work with you on developing an appropriate AIMP for your project.

Feel free to reach out to me to set up a meeting to discuss your project.

Thanks again,

Steve

Steve Roos

Environmental Planner

Agricultural Marketing and Development Division

625 Robert Street North

Saint Paul, MN 55155-2538

O: 651-201-6631

C: 612-968-7208



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216B.243 CERTIFICATE OF NEED FOR LARGE ENERGY FACILITY.

Subdivision 1. **Assessment of need criteria.** The commission shall, pursuant to chapter 14 and sections 216C.05 to 216C.30 and this section, adopt assessment of need criteria to be used in the determination of need for large energy facilities pursuant to this section.

Subd. 2. **Certificate required.** No large energy facility shall be sited or constructed in Minnesota without the issuance of a certificate of need by the commission pursuant to sections 216C.05 to 216C.30 and this section and consistent with the criteria for assessment of need.

Subd. 3. **Showing required for construction.** No proposed large energy facility shall be certified for construction unless the applicant can show that demand for electricity cannot be met more cost effectively through energy conservation and load-management measures and unless the applicant has otherwise justified its need. In assessing need, the commission shall evaluate:

(1) the accuracy of the long-range energy demand forecasts on which the necessity for the facility is based;

(2) the effect of existing or possible energy conservation programs under sections 216C.05 to 216C.30 and this section or other federal or state legislation on long-term energy demand;

(3) the relationship of the proposed facility to overall state energy needs, as described in the most recent state energy policy and conservation report prepared under section 216C.18, or, in the case of a high-voltage transmission line, the relationship of the proposed line to regional energy needs, as presented in the transmission plan submitted under section 216B.2425;

(4) promotional activities that may have given rise to the demand for this facility;

(5) benefits of this facility, including its uses to protect or enhance environmental quality, and to increase reliability of energy supply in Minnesota and the region;

(6) possible alternatives for satisfying the energy demand or transmission needs including but not limited to potential for increased efficiency and upgrading of existing energy generation and transmission facilities, load-management programs, and distributed generation, except that the commission must not require evaluation of alternative end points for a high-voltage transmission line qualifying as a large energy facility unless the alternative end points are (i) consistent with end points identified in a federally registered planning authority transmission plan, or (ii) otherwise agreed to for further evaluation by the applicant;

(7) the policies, rules, and regulations of other state and federal agencies and local governments;

(8) any feasible combination of energy conservation improvements, required under section 216B.241, that can (i) replace part or all of the energy to be provided by the proposed facility, and (ii) compete with it economically;

(9) with respect to a high-voltage transmission line, the benefits of enhanced regional reliability, access, or deliverability to the extent these factors improve the robustness of the transmission system or lower costs for electric consumers in Minnesota;

(10) whether the applicant or applicants are in compliance with applicable provisions of sections 216B.1691 and 216B.2425, subdivision 7, and have filed or will file by a date certain an application for certificate of need under this section or for certification as a priority electric transmission project under section 216B.2425 for any transmission facilities or upgrades identified under section 216B.2425, subdivision 7;

(11) whether the applicant has made the demonstrations required under subdivision 3a; and

(12) if the applicant is proposing a nonrenewable generating plant, the applicant's assessment of the risk of environmental costs and regulation on that proposed facility over the expected useful life of the plant, including a proposed means of allocating costs associated with that risk.

Subd. 3a. Use of renewable resource. The commission may not issue a certificate of need under this section for a large energy facility that generates electric power by means of a nonrenewable energy source, unless the applicant for the certificate has demonstrated to the commission's satisfaction that it has explored the possibility of generating power by means of renewable energy sources and has demonstrated that the alternative selected is less expensive, including environmental costs, than power generated by a renewable energy source. For purposes of this subdivision, "renewable energy source" includes hydro, wind, solar, and geothermal energy and the use of trees or other vegetation as fuel.

Subd. 3b. Nuclear power plant; new construction prohibited; relicensing. (a) The commission may not issue a certificate of need for the construction of a new nuclear-powered electric generating plant.

(b) Any certificate of need for additional storage of spent nuclear fuel for a facility seeking a license extension shall address the impacts of continued operations over the period for which approval is sought.

Subd. 4. Application for certificate; hearing. Any person proposing to construct a large energy facility shall apply for a certificate of need and for a site or route permit under chapter 216I prior to construction of the facility. The application shall be on forms and in a manner established by the commission. In reviewing each application the commission shall hold at least one public hearing pursuant to chapter 14. The public hearing shall be held at a location and hour reasonably calculated to be convenient for the public. An objective of the public hearing shall be to obtain public opinion on the necessity of granting a certificate of need and, if a joint hearing is held, a site or route permit. The commission shall designate a commission employee whose duty shall be to facilitate citizen participation in the hearing process. Unless the commission determines that a joint hearing on siting and need under this subdivision and chapter 216I is not feasible or more efficient, or otherwise not in the public interest, a joint hearing under this subdivision and chapter 216I must be held.

[See Note.]

Subd. 5. Approval, denial, or modification. Within 12 months of the submission of an application, the commission shall approve or deny a certificate of need for the facility. Approval or denial of the certificate shall be accompanied by a statement of the reasons for the decision. Issuance of the certificate may be made contingent upon modifications required by the commission. If the commission has not issued an order on the application within the 12 months provided, the commission may extend the time period upon receiving the consent of the parties or on its own motion, for good cause, by issuing an order explaining the good cause justification for extension.

Subd. 6. Application fees; rules. Any application for a certificate of need shall be accompanied by the application fee required pursuant to this subdivision. The application fee is to be applied toward the total costs reasonably necessary to complete the evaluation of need for the proposed facility. The maximum application fee shall be \$50,000, except for an application for an electric power generating plant as defined in section 216B.2421, subdivision 2, clause (1), or a high-voltage transmission line as defined in section 216B.2421, subdivision 2, clause (2), for which the maximum application fee shall be \$100,000. Costs exceeding the application fee and reasonably necessary to complete the evaluation of need for the proposed facility shall be recovered from the applicant. If the applicant is a public utility, a cooperative electric association, a generation and transmission cooperative electric association, a municipal power agency, a municipal electric utility, or a transmission company, the recovery shall be done pursuant to section 216B.62.

The commission shall establish by rule pursuant to chapter 14 and sections 216C.05 to 216C.30 and this section, a schedule of fees based on the output or capacity of the facility and the difficulty of assessment of need. Money collected in this manner shall be credited to the general fund of the state treasury.

Subd. 7. Participation by other agency or political subdivision. (a) Other state agencies authorized to issue permits for siting, construction or operation of large energy facilities, and those state agencies authorized to participate in matters before the commission involving utility rates and adequacy of utility services, shall present their position regarding need and participate in the public hearing process prior to the issuance or denial of a certificate of need. Issuance or denial of certificates of need shall be the sole and exclusive prerogative of the commission and these determinations and certificates shall be binding upon other state departments and agencies, regional, county, and local governments and special purpose government districts except as provided in sections 116C.01 to 116C.08 and 116D.04, subdivision 9.

(b) An applicant for a certificate of need shall notify the commissioner of agriculture if the proposed project will impact cultivated agricultural land, as that term is defined in section 216G.01, subdivision 4. The commissioner may participate in any proceeding on the application and advise the commission as to whether to grant the certificate of need, and the best options for mitigating adverse impacts to agricultural lands if the certificate is granted. The Department of Agriculture shall be the lead agency on the development of any agricultural mitigation plan required for the project.

Subd. 8. Exemptions. (a) This section does not apply to:

(1) cogeneration or small power production facilities as defined in the Federal Power Act, United States Code, title 16, section 796, paragraph (17), subparagraph (A), and paragraph (18), subparagraph (A), and having a combined capacity at a single site of less than 80,000 kilowatts; plants or facilities for the production of ethanol or fuel alcohol; or any case where the commission has determined after being advised by the attorney general that its application has been preempted by federal law;

(2) a high-voltage transmission line proposed primarily to distribute electricity to serve the demand of a single customer at a single location, unless the applicant opts to request that the commission determine need under this section or section 216B.2425;

(3) the upgrade to a higher voltage of an existing transmission line that serves the demand of a single customer that primarily uses existing rights-of-way, unless the applicant opts to request that the commission determine need under this section or section 216B.2425;

(4) a high-voltage transmission line of one mile or less required to connect a new or upgraded substation to an existing, new, or upgraded high-voltage transmission line;

(5) conversion of the fuel source of an existing electric generating plant to using natural gas;

(6) the modification of an existing electric generating plant to increase efficiency, as long as the capacity of the plant is not increased more than ten percent or more than 100 megawatts, whichever is greater;

(7) a large wind energy conversion system, as defined in section 216I.02, subdivision 12, or a solar energy generating system, as defined in section 216I.02, subdivision 18, for which a site permit application is submitted by an independent power producer under chapter 216I;

(8) a large wind energy conversion system, as defined in section 216I.02, subdivision 12, or a solar energy generating system, as defined in section 216I.02, subdivision 18, engaging in a repowering project that:

(i) will not result in the system exceeding the nameplate capacity under its most recent interconnection agreement; or

(ii) will result in the system exceeding the nameplate capacity under its most recent interconnection agreement, provided that the Midcontinent Independent System Operator has provided a signed generator interconnection agreement that reflects the expected net power increase;

(9) energy storage systems, as defined in section 216I.02, subdivision 6;

(10) transmission lines that directly interconnect large wind energy conversion systems, solar energy generating systems, or energy storage systems to the transmission system; or

(11) relocation of an existing high voltage transmission line to new right-of-way, provided that any new structures that are installed are not designed for and capable of operation at higher voltage.

(b) For the purpose of this subdivision, "repowering project" means:

(1) modifying a large wind energy conversion system or a solar energy generating system that is a large energy facility to increase its efficiency without increasing its nameplate capacity;

(2) replacing turbines in a large wind energy conversion system without increasing the nameplate capacity of the system; or

(3) increasing the nameplate capacity of a large wind energy conversion system.

[See Note.]

Subd. 9. **Renewable energy standard and carbon-free energy standard facilities.** This section does not apply to a wind energy conversion system or a solar electric generation facility that is intended to be used to meet the obligations of section 216B.1691, subdivision 2a or 2g; provided that, after notice and comment, the commission determines that the facility is a reasonable and prudent approach to meeting a utility's obligations under that section. When making this determination, the commission must consider:

(1) the size of the facility relative to a utility's total need for renewable resources;

(2) alternative approaches for supplying the renewable energy to be supplied by the proposed facility;

(3) the facility's ability to promote economic development, as required under section 216B.1691, subdivision 9;

(4) the facility's ability to maintain electric system reliability;

(5) impacts on ratepayers; and

(6) other criteria as the commission may determine are relevant.

History: 1974 c 307 s 13; 1975 c 170 s 3,4; 1977 c 381 s 19; Ex1979 c 2 s 32; 1980 c 579 s 10,11; 1980 c 614 s 123; 1981 c 356 s 159,248; 1982 c 424 s 130; 1982 c 561 s 2; 1983 c 289 s 46,115 subd 2; 1984 c 558 art 4 s 10; 1984 c 655 art 1 s 22,23; 1985 c 304 s 1; 1987 c 312 art 1 s 10 subd 1; 1991 c 235 art 4 s 1; art 6 s 2; 1994 c 641 art 2 s 2; 2001 c 212 art 7 s 31-33; 2002 c 398 s 4; 1Sp2003 c 11 art 1 s 4; 2005 c 97 art 1 s 5,6; art 2 s 4; art 3 s 13-15; 2008 c 296 art 1 s 13; 2009 c 110 s 23,24; 2014 c 254 s 13; 2016 c 189 art 6 s 8; 2023 c 7 s 23; 2023 c 60 art 12 s 22; 2024 c 126 art 8 s 2-6; 2024 c 127 art 44 s 2-6

NOTE: The amendments to subdivision 4 by Laws 2024, chapter 126, article 8, section 4, and Laws 2024, chapter 127, article 44, section 4, are effective July 1, 2025. Laws 2024, chapter 126, article 8, section 4, and Laws 2024, chapter 127, article 44, section 4, the effective dates.

NOTE: The amendments to subdivision 8, paragraph (a), clause (7), as added by Laws 2024, chapter 126, article 8, section 5, and Laws 2024, chapter 127, article 44, section 5, are effective July 1, 2025. Laws 2024, chapter 126, article 8, section 5, and Laws 2025, chapter 127, article 44, section 5, the effective dates.

NOTE: The reference to Minnesota Statutes, section 216I.02, subdivision 7, in paragraph (a), clause (9), as added by Laws 2024, chapter 126, article 8, section 5, and Laws 2024, chapter 127, article 44, section 5, is effective July 1, 2025. Prior to July 1, 2025, the definition of "energy storage system" in Minnesota Statutes, section 216E.01, subdivision 3a, applies. Laws 2024, chapter 126, article 8, section 5, and Laws 2024, chapter 127, article 44, section 5, the effective dates.

From: [Strohfus, Mark GRE-MG](#)
To: [Roos, Stephan \(MDA\)](#)
Cc: [Andrew Levi](#)
Subject: EXTERNAL: RE: Otto Tap 115kV Transmission Line Project [MDA]
Date: Monday, July 14, 2025 8:51:40 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

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We have three landowners with farming operations affected by our proposed project and have been having ongoing conversations with them about their irrigation systems. Those conversations have been going well.

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We anticipate filing our Route Permit Application with the Public Utilities Commission in August, and we're expecting them to hold a scoping and information meeting regarding the project in September.

If you have any additional questions, please feel free to reach out to me or Andrew.

Thanks,
Mark Strohfus
Project Manager – Transmission Permitting
Great River Energy
12300 Elm Creek Boulevard
Maple Grove, MN 55369
Direct: 763-445-5210 | Cell: 612-961-9820
www.GreatRiverEnergy.com

From: Roos, Stephan (MDA) <stephan.roos@state.mn.us>
Sent: Monday, May 19, 2025 2:39 PM
To: andrew.levi@merjent.com
Cc: Strohfus, Mark GRE-MG <MStrohfu@GREnergy.com>
Subject: Otto Tap 115kV Transmission Line Project [MDA]

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Hi Andrew,

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Feel free to reach out to me to set up a meeting to discuss your project.

Thanks again,
Steve

Steve Roos

Environmental Planner

Agricultural Marketing and Development Division

625 Robert Street North

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message.

Minnesota Department of Commerce

From: [Andrew Levi](#)
To: [Christopherson, Chase \(He/Him/His\) \(COMM\)](#)
Cc: [Strohfus, Mark GRE-MG](#)
Subject: Great River Energy Otto Tap 115 kV Transmission Line Project
Date: Thursday, September 11, 2025 2:01:00 PM
Attachments: [image001.png](#)
[GRE_OttoTap_ChaseChristopherson_20250910.pdf](#)

Dear Chase Christopherson,

Great River Energy is proposing to construct approximately 2.9 miles of new single-circuit, 115-kilovolt high voltage transmission line within Otto and Pine Lake Townships in Otter Tail County, Minnesota (the Project). As part of the Project, Great River Energy will replace the existing Lake Region Electric Cooperative-owned Otto Substation. More information about the Project, along with a map, is available in the attached letter and fact sheet.

Great River Energy is planning to submit a Route Permit Application to the Minnesota Public Utilities Commission in late summer of 2025. Great River Energy would appreciate any comments you might have about the Project. Please reach out to Mark Strohfus with Great River Energy at 763-445-5210 or MStrohfus@GREnergy.com with questions, written comments, or a request for a meeting.

Thank you,

Andrew Levi [on behalf of Mark Strohfus, Great River Energy]

Andrew Levi

612.354.4280 direct

andrew.levi@merjent.com



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Minneapolis, MN 55414

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Minnesota Department of Health

From: [Andrew Levi](#)
To: david.bell@state.mn.us
Cc: dan_disrud@state.mn.us; luke.pickman@state.mn.us; dereck.richter@state.mn.us; danielle.luzinski@state.mn.us; [Strohfus, Mark GRE-MG](#)
Subject: Great River Energy -- Otto Tap 115 kV Transmission Line Project
Date: Monday, May 12, 2025 11:04:00 AM
Attachments: [image001.png](#)
[Otto Tap Transmission Line Fact Sheet.pdf](#)
[GRE_OttoTap_MDH_Intro_Letter_Final_cc.pdf](#)

Dear David Bell,

Great River Energy is proposing to construct approximately 2.9 miles of new single-circuit, 115-kilovolt high voltage transmission line within Otto and Pine Lake Townships in Otter Tail County, Minnesota (the Project). As part of the Project, Great River Energy will upgrade the existing Lake Region Electric Cooperative-owned Otto Substation. More information about the Project, along with a map, is available in the attached letter and fact sheet.

Great River Energy is planning to submit a Route Permit Application to the Minnesota Public Utilities Commission in late summer of 2025. Great River Energy would appreciate any comments you might have about the Project. Please reach out to Mark Strohfus with Great River Energy at 763-445-5210 or MStrohfus@GREnergy.com with questions, written comments, or a request for a meeting.

Thank you,

Andrew Levi [on behalf of Mark Strohfus, Great River Energy]

Andrew Levi

612.354.4280 direct

612-246-8581 mobile

andrew.levi@merjent.com



1 Main Street SE, Suite 300

Minneapolis, MN 55414

612.746.3660 main

www.merjent.com

Minnesota Department of Natural Resources

From: [Andrew Levi](#)
To: kate.fairman@state.mn.us; samantha.bump@state.mn.us
Cc: [Strohfus, Mark GRE-MG](#)
Subject: Great River Energy -- Otto Tap 115 kV Transmission Line Project
Date: Monday, May 12, 2025 11:08:00 AM
Attachments: [image001.png](#)
[Otto Tap Transmission Line Fact Sheet.pdf](#)
[GRE OttoTap_DNR_Intro_Letter_Final.pdf](#)

Dear Kate Fairman and Samantha Bump,

Great River Energy is proposing to construct approximately 2.9 miles of new single-circuit, 115-kilovolt high voltage transmission line within Otto and Pine Lake Townships in Otter Tail County, Minnesota (the Project). As part of the Project, Great River Energy will upgrade the existing Lake Region Electric Cooperative-owned Otto Substation. More information about the Project, along with a map, is available in the attached letter and fact sheet.

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Thank you,

Andrew Levi [on behalf of Mark Strohfus, Great River Energy]

Andrew Levi

612.354.4280 direct
612-246-8581 mobile
andrew.levi@merjent.com



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Minneapolis, MN 55414
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Minnesota Department of Natural Resources
Natural Heritage Review



Minnesota Department of Natural Resources
Division of Ecological & Water Resources
500 Lafayette Road, Box 25
St. Paul, MN 55155-4025

May 20, 2025

Mandy Bohnenblust
Merjent, Inc.

RE: Natural Heritage Review of the proposed **Otto Tline**,
T135N R38W Sections 5-8, T136N R38W Sections 29-32; Otter Tail County

Dear Mandy Bohnenblust,

For all correspondence regarding the Natural Heritage Review of this project please include the project ID **MCE-2025-00113** in the email subject line.

As requested, the [Minnesota Natural Heritage Information System](#) has been reviewed to determine if the proposed project has the potential to impact any rare species or other significant natural features. **Based on the project details provided with the request, I do not believe the proposed project will negatively affect any known occurrences of rare features.** To ensure compliance with federal law, conduct a federal regulatory review using the U.S. Fish and Wildlife Service's (USFWS) online [Information for Planning and Consultation \(IPaC\) tool](#).

The Natural Heritage Information System (NHIS), a collection of databases that contains information about Minnesota's rare natural features, is maintained by the Division of Ecological and Water Resources, Department of Natural Resources. The NHIS is continually updated as new information becomes available and is the most complete source of data on Minnesota's native plant communities, rare species, and other rare features. However, the NHIS is not an exhaustive inventory and does not contain the locations of all rare features in the state. Therefore, ecologically significant features for which we have no records may exist within the project area. If additional information becomes available regarding rare features in the vicinity of the project, further review may be necessary.

For environmental review purposes, the results of this Natural Heritage Review are valid for one year; the results are only valid for the project location and project description provided with the request. **If project details change or the project has not occurred within one year, please resubmit the project for review within one year of initiating project activities.** Resubmit by selecting *Clone Project as Draft* on the project page in MCE.

The Natural Heritage Review does not constitute project approval by the Department of Natural Resources. Instead, it identifies issues regarding known occurrences of rare features and potential impacts to these rare features. Visit [Natural Heritage Review](#) for additional information regarding this process, survey guidance, and

other related information. For information on the environmental review process or other natural resource concerns, please contact your [DNR Regional Environmental Assessment Ecologist](#).

Please include a copy of this letter and the MCE-generated Final Project Report in any state or local license or permit application. Thank you for consulting us on this matter, and for your interest in preserving Minnesota's rare natural resources.

Sincerely,

Molly Barrett

Natural Heritage Review Specialist

molly.barrett@state.mn.us

Minnesota Department of Revenue

From: [MN_MDOR_Sa Property](#)
To: [Andrew Levi](#)
Cc: [Strohfus, Mark GRE-MG](#)
Subject: RE: EXTERNAL: RE: Great River Energy Otto Tap 115 kV Transmission Line Project
Date: Friday, September 12, 2025 12:51:30 PM
Attachments: [image002.png](#)
[image009.png](#)

Thank you for the background.

To confirm, the State Assessed Property Section does not have any comments or concerns regarding the project.

Have a great weekend.

Holly Soderbeck

State Assessed Property Section Supervisor
Property Tax Division
Phone: 651-556-6105

Minnesota Department of Revenue

www.revenue.state.mn.us

Working together to fund the future for all of Minnesota.



From: Andrew Levi <andrew.levi@merjent.com>
Sent: Friday, September 12, 2025 12:40 PM
To: MN_MDOR_Sa Property <sa.property@state.mn.us>
Cc: Strohfus, Mark GRE-MG <MStrohfu@GREnergy.com>
Subject: RE: EXTERNAL: RE: Great River Energy Otto Tap 115 kV Transmission Line Project

You don't often get email from andrew.levi@merjent.com. [Learn why this is important](#)

Hello Holly,

Thank you for your email. The Otto Tap Transmission Line Project is regulated by the Minnesota Public Utilities Commission (MPUC). The MPUC recommends that applicants provide notification to those agencies listed on their state agency technical representative list. That is why we contacted you.

To answer your question, there is no state land associated with this project.

Thank you,

Andrew Levi

612.354.4280 direct
612-246-8581 mobile
andrew.levi@merjent.com



1 Main Street SE, Suite 300
Minneapolis, MN 55414
612.746.3660 main
www.merjent.com

From: MN_MDOR_Sa Property <sa.property@state.mn.us>
Sent: Friday, September 12, 2025 10:35 AM
To: Andrew Levi <andrew.levi@merjent.com>
Cc: Strohfus, Mark GRE-MG <MStrohfu@GREnergy.com>
Subject: EXTERNAL: RE: Great River Energy Otto Tap 115 kV Transmission Line Project

CAUTION: This email originated from outside of Merjent.

Hi Andrew and Mark,

Are you contacting us as the assessing authority (we assess the operating property of electric generation, transmission, and distribution systems) of this project or are you contacting us because the state is a landowner (not sure the state is a landowner) in the project area?

If you are contacting us as the assessing authority, we do not have any comments or concerns.

If you are contacting us because the State of Minnesota is a landowner in the project area, we will have to do some research to identify the correct state agency for this information.

Thank you,

Holly Soderbeck

State Assessed Property Section Supervisor
Property Tax Division
Phone: 651-556-6105

Minnesota Department of Revenue

www.revenue.state.mn.us

Working together to fund the future for all of Minnesota.



From: Andrew Levi <andrew.levi@merjent.com>
Sent: Thursday, September 11, 2025 2:01 PM
To: MN_MDOR_Sa Property <sa.property@state.mn.us>
Cc: Strohfus, Mark GRE-MG <MStrohfus@GREnergy.com>
Subject: Great River Energy Otto Tap 115 kV Transmission Line Project

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Dear Alan Whipple,

Great River Energy is proposing to construct approximately 2.9 miles of new single-circuit, 115- kilovolt high voltage transmission line within Otto and Pine Lake Townships in Otter Tail County, Minnesota (the Project). As part of the Project, Great River Energy will replace the existing Lake Region Electric Cooperative-owned Otto Substation. More information about the Project, along with a map, is available in the attached letter and fact sheet.

Great River Energy is planning to submit a Route Permit Application to the Minnesota Public Utilities Commission in late summer of 2025. Great River Energy would appreciate any comments you might have about the Project. Please reach out to Mark Strohfus with Great River Energy at 763-445-5210 or MStrohfus@GREnergy.com with questions, written comments, or a request for a meeting.

Thank you,

Andrew Levi [on behalf of Mark Strohfus, Great River Energy]

Andrew Levi

612.354.4280 direct
andrew.levi@merjent.com



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Minneapolis, MN 55414
612.746.3660 main
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Minnesota Department of Transportation

From: Hogan, Karissa (She/Her/Hers) (DOT)
To: Andrew Levi; Stroffus, Mark GRE-MG
Cc: Kotch Egstad, Stacy (DOT)
Subject: EXTERNAL: RE: Great River Energy -- Otto Tap 115 kV Transmission Line Project
Date: Friday, May 30, 2025 8:06:21 AM
Attachments: image001.png
image003.png

CAUTION: This email originated from outside of Merjent.

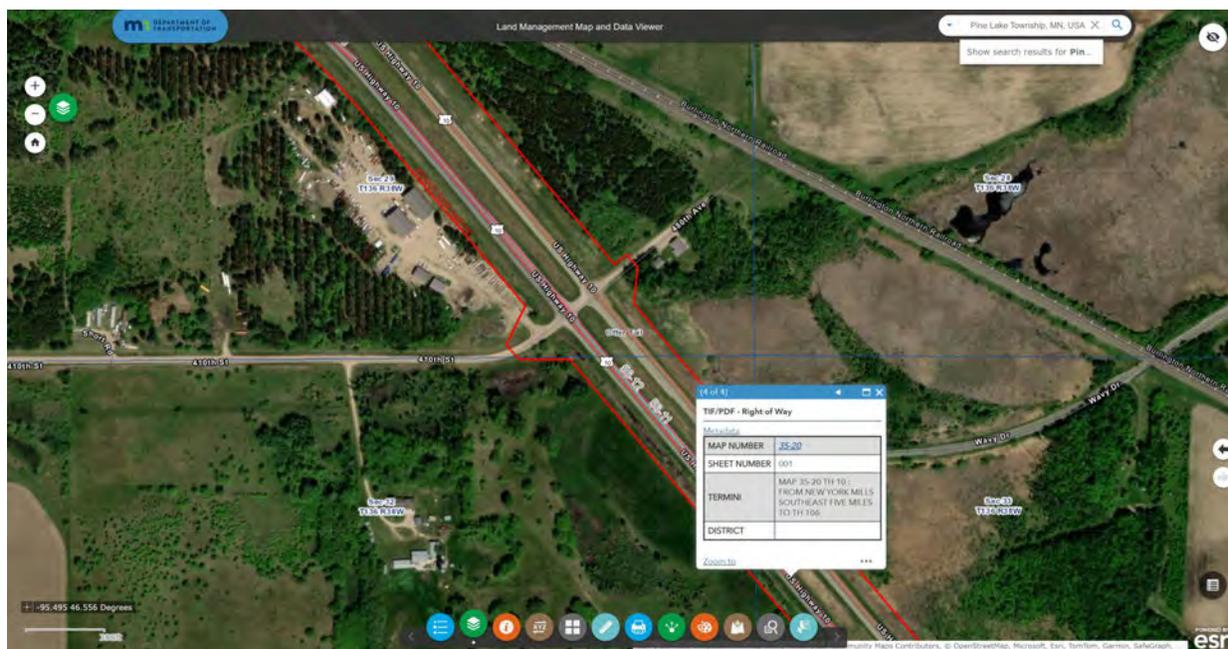
Hi Mark and Andrew,

Thank you for providing the introductory letter and fact sheet for the Otto Tap 115 kV Transmission Line Project in Otter Tail County. We've reviewed the materials and would like to share a few observations regarding potential implications for MnDOT.

The proposed project includes an aerial crossing of US Highway 10, which is under MnDOT's jurisdiction. This crossing will require coordination with MnDOT to obtain the appropriate utility permit(s). Review will include vertical and horizontal clearance standards, construction safety, and any potential impacts to MnDOT right-of-way (ROW). Because the proposed project intersects an area within the TH ROW showing Cultural Resources locations, MnDOT requests clarification of pole locations. If poles are expected to occupy TH ROW, a Utility Early Notification Memo (ENM) will need to be completed to evaluate potential impacts to archaeological or historic resources, among other potential MnDOT resource group impacts.

Although the majority of the proposed route follows township or private property, we recommend early engagement with MnDOT if any construction activities, pole placements, or access needs are anticipated within or adjacent to MnDOT ROW. This includes confirming final alignment and any specialty structure locations. That said, MnDOT encourages ongoing coordination to ensure all requirements are addressed. If you are interested in hosting a brief project introduction meeting with Stacy Kotch Egstad, district, and OES staff to discuss perceived or actual impacts to the TH ROW, please contact me with date/time options and I'll work to find openings on my side.

Finally, as an FYI, the snippet below shows MnDOT's "approximate ROW limits" in the impacted area.



MnDOT District 4 current construction projects:

- [MnDOT D4 Current Construction Map](#)
- [MnDOT D4 Current STIP Map](#)

Thank you again for initiating early consultation and review of this project,

Karissa Hogan
Documents & Utility Permits Coordinator
Office of Land Management
Minnesota Department of Transportation
karissa.hogan@state.mn.us | www.mndot.gov



From: Andrew Levi <andrew.levi@merjent.com>
Sent: Monday, May 12, 2025 11:10 AM
To: Kotch Egstad, Stacy (DOT) <stacy.kotch@state.mn.us>
Cc: Strohfus, Mark GRE-MG <MStrohfu@GREnergy.com>
Subject: Great River Energy -- Otto Tap 115 kV Transmission Line Project

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Dear Stacy Kotch Egstad,

Great River Energy is proposing to construct approximately 2.9 miles of new single-circuit, 115-kilovolt high voltage transmission line within Otto and Pine Lake Townships in Otter Tail County, Minnesota (the Project). As part of the Project, Great River Energy will upgrade the existing Lake Region Electric Cooperative-owned Otto Substation. More information about the Project, along with a map, is available in the attached letter and fact sheet.

Great River Energy is planning to submit a Route Permit Application to the Minnesota Public Utilities Commission in late summer of 2025. Great River Energy would appreciate any comments you might have about the Project. Please reach out to Mark Strohfus with Great River Energy at 763-445-5210 or MStrohfu@GREnergy.com with questions, written comments, or a request for a meeting.

Thank you,

Andrew Levi [on behalf of Mark Strohfus, Great River Energy]

Andrew Levi
612.354.4280 direct
612-246-8581 mobile
andrew.levi@merjent.com



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Minneapolis, MN 55414
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From: [Andrew Levi](#)
To: [Hogan, Karissa \(She/Her/Hers\) \(DOT\)](#); [Strohfus, Mark GRE-MG](#)
Cc: [Kotch Egstad, Stacy \(DOT\)](#); [Britta Bergland](#)
Subject: RE: EXTERNAL: RE: Great River Energy -- Otto Tap 115 kV Transmission Line Project
Date: Friday, May 30, 2025 4:14:00 PM
Attachments: [image001.png](#)
[image003.png](#)

Karissa,

Thank you for your email and the information you've shared. We would be happy to meet with you about the project. Given our schedules, it looks like we can be available the week of June 16. Do you have any availability that week?

Thanks, again. Enjoy the weekend!

--Andrew

Andrew Levi
612.354.4280 direct
612.246.8581 mobile
andrew.levi@merjent.com



1 Main Street SE, Suite 300
Minneapolis, MN 55414
612.746.3660 main
www.merjent.com

From: Hogan, Karissa (She/Her/Hers) (DOT) <Karissa.Hogan@state.mn.us>
Sent: Friday, May 30, 2025 8:06 AM
To: Andrew Levi <andrew.levi@merjent.com>; Strohfus, Mark GRE-MG <MStrohfu@GREnergy.com>
Cc: Kotch Egstad, Stacy (DOT) <stacy.kotch@state.mn.us>
Subject: EXTERNAL: RE: Great River Energy -- Otto Tap 115 kV Transmission Line Project

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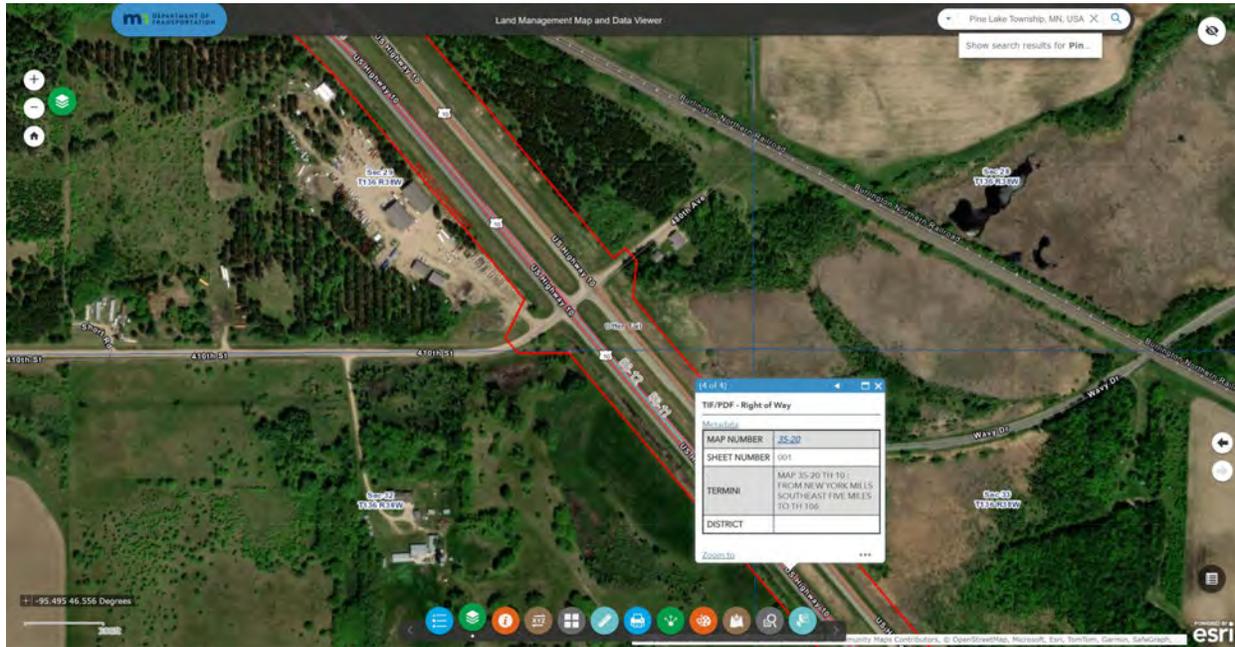
Hi Mark and Andrew,

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Finally, as an FYI, the snippet below shows MnDOT's "approximate ROW limits" in the impacted area.



MnDOT District 4 current construction projects:

[MnDOT D4 Current Construction Map](#)

[MnDOT D4 Current STIP Map](#)

Thank you again for initiating early consultation and review of this project,

Karissa Hogan

Documents & Utility Permits Coordinator
Office of Land Management
Minnesota Department of Transportation
karissa.hogan@state.mn.us | www.mndot.gov



From: Andrew Levi <andrew.levi@merjent.com>
Sent: Monday, May 12, 2025 11:10 AM
To: Kotch Egstad, Stacy (DOT) <stacy.kotch@state.mn.us>
Cc: Strohfus, Mark GRE-MG <MStrohfus@GREnergy.com>
Subject: Great River Energy – Otto Tap 115 kV Transmission Line Project

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Dear Stacy Kotch Egstad,

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Thank you,

Andrew Levi [on behalf of Mark Strohfus, Great River Energy]

Andrew Levi

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612-246-8581 mobile
andrew.levi@merjent.com



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From: [Hogan, Karissa \(She/Her/Hers\) \(DOT\)](#)
To: [Andrew Levi](#); [Strohfus, Mark GRE-MG](#)
Cc: [Kotch Egstad, Stacy \(DOT\)](#); [Britta Bergland](#)
Subject: RE: EXTERNAL: RE: Great River Energy -- Otto Tap 115 kV Transmission Line Project
Date: Monday, June 2, 2025 11:26:27 AM
Attachments: [image001.png](#)
[image003.png](#)

Hi Andrew,

Thanks for getting back to me. I'm glad to hear you're open to meeting. It looks like everyone on our team (Stacy, Tara Carson at tara.carson@state.mn.us, John Gildersleeve at john.gildersleeve@state.mn.us, Jeremy Flatau at jeremy.flatau@state.mn.us, and myself) has wide availability on Wednesday, June 18, between 8:30 a.m. and 1:30 p.m. If a time during that window works for you, feel free to send over a calendar invite and meeting link.

Looking forward to the conversation!

Karissa Hogan

Documents & Utility Permits Coordinator
Office of Land Management
Minnesota Department of Transportation
karissa.hogan@state.mn.us | www.mndot.gov



From: Andrew Levi <andrew.levi@merjent.com>
Sent: Friday, May 30, 2025 4:15 PM
To: Hogan, Karissa (She/Her/Hers) (DOT) <Karissa.Hogan@state.mn.us>; Strohfus, Mark GRE-MG <MStrohfu@GREnergy.com>
Cc: Kotch Egstad, Stacy (DOT) <stacy.kotch@state.mn.us>; Britta Bergland <britta.bergland@merjent.com>
Subject: RE: EXTERNAL: RE: Great River Energy -- Otto Tap 115 kV Transmission Line Project

Karissa,

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Thanks, again. Enjoy the weekend!

--Andrew

Andrew Levi
612.354.4280 direct
612-246-8581 mobile
andrew.levi@merjent.com


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Minneapolis, MN 55414
612.746.3660 main
www.merjent.com

From: Hogan, Karissa (She/Her/Hers) (DOT) <Karissa.Hogan@state.mn.us>
Sent: Friday, May 30, 2025 8:06 AM
To: Andrew Levi <andrew.levi@merjent.com>; Strohfus, Mark GRE-MG <MStrohfu@GREnergy.com>
Cc: Kotch Egstad, Stacy (DOT) <stacy.kotch@state.mn.us>
Subject: EXTERNAL: RE: Great River Energy -- Otto Tap 115 kV Transmission Line Project

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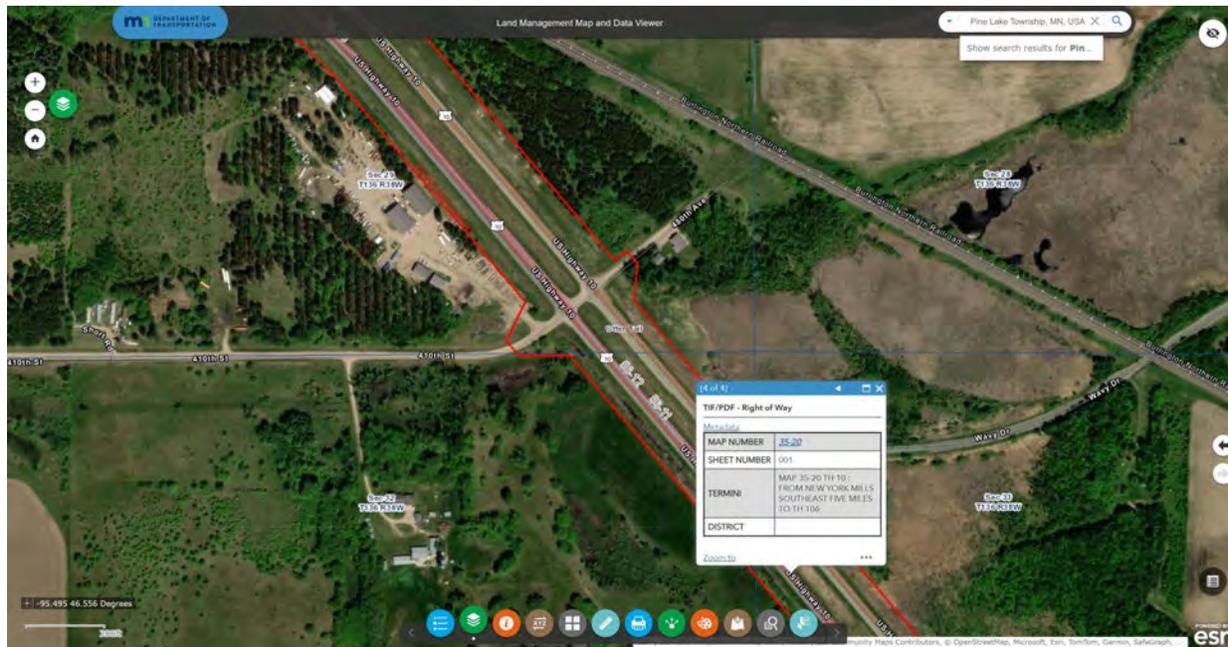
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- [MnDOT D4 Current STIP Map](#)

Thank you again for initiating early consultation and review of this project,

Karissa Hogan
Documents & Utility Permits Coordinator
Office of Land Management
Minnesota Department of Transportation
karissa.hogan@state.mn.us | www.mndot.gov



From: Andrew Levi <andrew.levi@merjent.com>
Sent: Monday, May 12, 2025 11:10 AM
To: Kotch Egstad, Stacy (DOT) <stacy.kotch@state.mn.us>
Cc: Strohfus, Mark GRE-MG <MStrohfu@GREnergy.com>
Subject: Great River Energy -- Otto Tap 115 kV Transmission Line Project

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Dear Stacy Kotch Egstad,

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Thank you,

Andrew Levi [on behalf of Mark Strohfus, Great River Energy]

Andrew Levi
612.354.4280 direct
612.246.8581 mobile
andrew.levi@merjent.com



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From: [Andrew Levi](#)
To: [Karissa.Hogan@state.mn.us](#); [Kotch.Egstad.Stacy \(DOT\)](#); [tara.carson@state.mn.us](#);
[john.gildersleeve@state.mn.us](#); [jeremy.flatau@state.mn.us](#); [Strohfus, Mark GRE-MG](#); [Britta Bergland](#)
Subject: Otto Tap Transmission Line
Start: Wednesday, June 18, 2025 9:00:00 AM
End: Wednesday, June 18, 2025 10:00:00 AM
Location: Microsoft Teams Meeting

Karissa,

Thank you for getting this set up. We look forward to meeting with you all later this month.

--Andrew

Microsoft Teams Need help? <<https://aka.ms/JoinTeamsMeeting?omkt=en-US>>

Join the meeting now <https://teams.microsoft.com/l/meetup-join/19%3ameeting_NWU0NjM4MTEtOTk5NC00NjA2LWFiNjAtMDkzZDgwMDBIN2Zh%40thread.v2/0?context=%7b%22Tid%22%3a%221cc8bd10-ce8b-4c0a-b3f7-bcd338132bc0%22%2c%22Oid%22%3a%22f53189ba-9cd0-4719-8f30-3fba677b5c4%22%7d>

Meeting ID: 297 393 282 120 1

Passcode: WU2RU2wt

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(833) 659-5701,,97216134# <tel:8336595701,,97216134> United States (Toll-free)

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From: [Andrew Levi](#)
To: [Kotch Egstad, Stacy \(DOT\)](#)
Cc: [Strohfus, Mark GRE-MG](#)
Subject: Otto Tap Transmission Line Meeting Notes
Date: Thursday, July 24, 2025 2:36:00 PM
Attachments: [image001.png](#)
[OttoTap_MnDOTENM_MeetingNotes_Draft_20250724.docx](#)
[BassLakeSub115kV1.pdf](#)

Hello Stacy,

I trust my note finds you well.

Attached are draft notes from our June 18 discussion concerning the Otto Tap Transmission Line Project. Neither Mark nor I caught Kyle's last name. If you could provide that along with any other comments you might have, we'd greatly appreciate it.

Also attached is a photo of GRE's switch pole at the Bass Lake Substation in Maple Grove. GRE expects the pole for the Project will be larger in diameter since the span across Highway 10 will be greater than 300 feet.

Let me know if you have any questions.

Thanks,

Andrew Levi

612.354.4280 direct

612-246-8581 mobile

andrew.levi@merjent.com



1 Main Street SE, Suite 300

Minneapolis, MN 55414

612.746.3660 main

www.merjent.com

Otto Tap Transmission Line Project
MnDOT Early Notification Memo Meeting
June 18, 2025
Virtual

Attendees: Stacy Kotch Egstad (MnDOT), Karissa Hogan (MnDOT), Jeremy Flatau (MnDOT), Kyle, Tara Carson (MnDOT), Mark Strohfus (GRE), Andrew Levi (Merjent)

Action items: 1) Mark to provide representative photo of 3-way switch to MnDOT staff. 2) Stacey to provide GRE response concerning level of detail needed when providing buried utilities information. 3) Ongoing communication as needed.

Mark provided an overview of the Project, and the reasons behind the need to shift the alignment from the north/south alignment previously reviewed by MnDOT (railroad licensing concerns and an unreachable landowner). Mark indicated that deadend structures will be placed on private property outside of MnDOT ROW. Cultural resources near the crossing have been previously disturbed and this has been confirmed by Tribes. Cultural resource studies and surveys will take place within the project area as necessary and in coordination with SHPO. No landowner concerns have been identified to date. Mark acknowledged that GRE would need to obtain a Crossing License and Temporary Use Permit to construct the Project.

Stacy stated that MnDOT's concern was related to whether the structures were going to be placed in MnDOT ROW. Given they will not be in MnDOT ROW, and the Project consists of a single perpendicular crossing, no Early Notification Memo (ENM) is required for the Project. Stacy asked for a representative graphic of a 3-way switch.

Mark asked if ENMs can be expected in the future. Stacey stated that early communication is important. The ENM process facilitates that communication, and it isn't going away. MnDOT recognizes the work is duplicative of Public Utilities Commission permitting but intends that the information required can be drawn from material already prepared in the draft route permit application. The idea is not to delay any downstream permitting and the ENM process also facilitates those processes.

Mark asked about buried utilities and the requirements for reporting. Mark asked if it is possible to provide the identity and number of utilities within a certain distance of the structure locations given the need to rely on Gopher One Call locates to identify buried utility locations. Stacy is going to speak with Anne and provide a response to Mark.

Several questions were asked about the Project such as its voltage and where it will interconnect. Mark answered those questions (115 kV, existing 115 kV line and substation/distribution system). The existing 41.6 kV is 1990 vintage. It was unknown if an existing permit is filed for that line. Mark provided more detail on cultural resources stating that a survey will occur to identify any cemeteries given their presence on historic documents. Jeremy asked GRE to confirm MnDOT ROW maps to ensure pole placement. Mark indicated that GRE had done that.



From: [Kotch Egstad, Stacy \(DOT\)](#)
To: [Andrew Levi](#)
Cc: [Strohfus, Mark GRE-MG](#)
Subject: EXTERNAL: RE: Otto Tap Transmission Line Meeting Notes
Date: Tuesday, July 29, 2025 11:12:42 AM
Attachments: [image002.png](#)
[image003.png](#)
[OttoTap_MnDOTENM_MeetingNotes_Draft_20250724_\(002\).docx](#)

CAUTION: This email originated from outside of Merjent.

Thank you for the draft meeting notes and example switch pole visual.

I've attached my edited meeting notes. Should be all up to date on MnDOT action items???
Please let me know if I missed anything or if you'd like to have further discussions.

Thank you all again,

Stacy Kotch Egstad

Utility Routing & Siting Coordinator | Office of Land Management

Minnesota Department of Transportation

395 John Ireland Blvd Mailstop 678

St. Paul, MN. 55155

651-358-0786



From: Andrew Levi <andrew.levi@merjent.com>
Sent: Thursday, July 24, 2025 2:36 PM
To: Kotch Egstad, Stacy (DOT) <stacy.kotch@state.mn.us>
Cc: Strohfus, Mark GRE-MG <MStrohfu@GREnergy.com>
Subject: Otto Tap Transmission Line Meeting Notes

This message may be from an external email source.

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

Hello Stacy,

I trust my note finds you well.

Attached are draft notes from our June 18 discussion concerning the Otto Tap Transmission Line Project. Neither Mark nor I caught Kyle's last name. If you could provide that along with any other comments you might have, we'd greatly appreciate it.

Also attached is a photo of GRE's switch pole at the Bass Lake Substation in Maple Grove. GRE expects the pole for the Project will be larger in diameter since the span across Highway 10 will be greater than 300 feet.

Let me know if you have any questions.

Thanks,

Andrew Levi

612.354.4280 direct

612-246-8581 mobile

andrew.levi@merjent.com



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Otto Tap Transmission Line Project
MnDOT Early Notification Memo Meeting
June 18, 2025
Virtual

Attendees: Stacy Kotch Egstad (MnDOT), Karissa Hogan (MnDOT), Jeremy Flatau (MnDOT), Daryn Minske (MnDOT), Tara Carson (MnDOT), Mark Strohfus (GRE), Andrew Levi (Merjent)

Action items: 1) Mark to provide representative photo of 3-way switch to MnDOT staff. 2) Stacy to provide GRE response concerning level of detail needed when providing buried utilities information – see below. 3) Ongoing communication as needed.

Mark provided an overview of the Project, and the reasons behind the need to shift the alignment from the north/south alignment previously reviewed by MnDOT (railroad licensing concerns and an unreachable landowner). Mark indicated that deadend structures will be placed on private property outside of MnDOT ROW. Cultural resources near the crossing have been previously disturbed and this has been confirmed by Tribes. Cultural resource studies and surveys will take place within the project area as necessary and in coordination with SHPO. No landowner concerns have been identified to date. Mark acknowledged that GRE would need to obtain a Crossing License and Temporary Use Permit to construct the Project.

Stacy stated that MnDOT's concern was related to whether the structures were going to be placed in MnDOT ROW. Given they will not be in MnDOT ROW, and the Project consists of a single perpendicular crossing, no Early Notification Memo (ENM) is required for the Project. Stacy asked for a representative graphic of a 3-way switch.

Mark asked if ENMs can be expected in the future. Stacy stated that early communication is important. The ENM process facilitates that communication, and it isn't going away. MnDOT recognizes the work is duplicative of Public Utilities Commission permitting but intends that the information required can be drawn from material already prepared in the draft route permit application. The idea is not to delay any downstream permitting and the ENM process also facilitates those processes.

Mark asked about buried utilities and the requirements for reporting. Mark asked if it is possible to provide the identity and number of utilities within a certain distance of the structure locations given the need to rely on Gopher One Call locates to identify buried utility locations. Stacy is going to speak with Anne and provide a response to Mark. 2) If the pole foundations will not occupy TH ROW, AND temporary construction activities will not take place in TH ROW, then no buried GSOC locates will be required.

Several questions were asked about the Project such as its voltage and where it will interconnect. Mark answered those questions (115 kV, existing 115 kV line and substation/distribution system). The existing 41.6 kV is 1990 vintage. It was unknown if an existing permit is filed for that line. Mark provided more detail on cultural resources stating that a survey will occur to identify any cemeteries given their presence on historic documents. Jeremy asked GRE to confirm MnDOT ROW maps to ensure pole placement. Mark indicated that GRE had done that.

Minnesota Indian Affairs Council

From: [Goggleye Jr, George J \(MIAC\)](#)
To: [Andrew Levi](#)
Cc: [Strohfus, Mark GRE-MG](#); [Geraghty, Lilly \(She/Her/Hers\) \(MIAC\)](#); [Weston, Isaac \(He/Him/His\) \(MIAC\)](#); [Geshick, Shannon \(MIAC\)](#)
Subject: EXTERNAL: RE: Great River Energy -- Otto Tap 115 kV Transmission Line Project
Date: Monday, May 12, 2025 12:10:12 PM
Attachments: [image003.png](#)
[Review Form - MIAC.docx](#)

CAUTION: This email originated from outside of Merjent.

Good afternoon,

I am providing word document form that MIAC requires for review requests from entities such as Great River Energy. Please follow the instructions provided in the document and send back to the email address listed.

Have any questions please feel free to contact MIAC at your convenience.

Kind regards.

George Goggleye Jr
Cultural Resource Manager
Minnesota Indian Affairs Council (MIAC)
616 America Ave Suite 170
Bemidji, MN 56601
Cell: 612-456-8028

To protect the sovereignty of the tribal nations who share geography with the state of Mni Sota and ensure the well being of all American Indian citizens throughout the state.

mn.gov/indianaffairs



From: Andrew Levi <andrew.levi@merjent.com>
Sent: Monday, May 12, 2025 11:16 AM
To: Geshick, Shannon (MIAC) <shannon.geshick@state.mn.us>; Goggleye Jr, George J (MIAC) <George.Goggleye@state.mn.us>
Cc: Strohfus, Mark GRE-MG <MStrohfu@GREnergy.com>
Subject: Great River Energy -- Otto Tap 115 kV Transmission Line Project

Some people who received this message don't often get email from andrew.levi@merjent.com. [Learn why this is important](#)

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Dear Shannon Geshick and George J. Goggeye, Jr.,

Great River Energy is proposing to construct approximately 2.9 miles of new single-circuit, 115-kilovolt high voltage transmission line within Otto and Pine Lake Townships in Otter Tail County, Minnesota (the Project). As part of the Project, Great River Energy will upgrade the existing Lake Region Electric Cooperative-owned Otto Substation. More information about the Project, along with a map, is available in the attached letter and fact sheet.

Great River Energy is planning to submit a Route Permit Application to the Minnesota Public Utilities Commission in late summer of 2025. Great River Energy would appreciate any comments you might have about the Project. Please reach out to Mark Strohfus with Great River Energy at 763-445-5210 or MStrohfus@GREnergy.com with questions, written comments, or a request for a meeting.

Thank you,

Andrew Levi [on behalf of Mark Strohfus, Great River Energy]

Andrew Levi

612.354.4280 direct

612-246-8581 mobile

andrew.levi@merjent.com



1 Main Street SE, Suite 300

Minneapolis, MN 55414

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PROJECT REVIEW FORM

Instructions to complete the form –

Please ensure that all the fields listed with an asterisk (*) are completed before you submit your request as they are mandatory and comprise the minimum information needed for us to fulfill your request.

This is a fillable document. After completing this form, you can either save it and send it to us electronically, or you can print it, and then scan the completed form and send it to us electronically.

When you are about to send us the completed form, please feel free to add additional attachments like photos, documents etc. that are complimentary to this request.

After completing this form please send your request to: MIAC.culturalresources@state.mn.us

Data Dictionary of the form fields

Project Name – The user can add a project name for the requested review. Example: Mounds Review, Historic Property Review etc.

Project ID – The user can create a unique identifier by which MIAC &/or OSA can communicate back to the user regarding their submitted request. Example: Mounds123, HPP789 etc.

Reason for Review – The user can add the reason they are submitting the review request.

Review Type – What is the type of review you are requesting.

Funding – If there is any funding attached to your request, please mark the appropriate selection.

Organization Name – If you are associated with an organization on whose behalf you are sending this request.

Submitting Organization Type – Please select the organization type you are associated with.

Project Description – Please write a detailed description of the project you would like reviewed.

Site Numbers – If you consulted the [State Archaeologist portal](#) and your proposed project intersected any sites add the site numbers as part of your request.

County – Please add the County(s) where the project is located.

Background Research Done – If you consulted any of the systems before sending this request.

Known Resources Adjacent to Review Area – If you are aware of any known cultural resources adjacent to your project area, please mark the selection(s) appropriately.

Additional Information – If there is any other additional information, you want us to know for us to work on your request.

Location Information (PLSS) – Please add the Township, Range, Range Direction, Section for the project you are wanting us to review [Complete this or Location Information (Project Address) if PLSS is not known].

Location Information (Project Address) – If PLSS is not known for your project, enter the project's address here.

Requested By – Name of the person submitting this request [this will be used for communication purposes only].

Requestor's Email Address – Valid email of the person submitting the request [this will be used for communication purposes only].

Requestor's Phone Number – Phone number of the person submitting the request [this will be used for communication purposes only].

Requestor's Physical Address – Physical address of the person submitting the request [this will be used for communication purposes only].

Attachments - Please add any pertinent photos, maps, documents etc. to accompany your request.

REVIEW INFORMATION

1. **PROJECT NAME*:** Click or tap here to enter text.
2. **PROJECT ID:** Click or tap here to enter text.
3. **REASON FOR REVIEW*:** Click or tap here to enter text.
4. **REVIEW TYPE*:** Choose an item.
5. **FUNDING*:** Choose an item.
6. **ORGANIZATION NAME:** Click or tap here to enter text.
7. **SUBMITTING ORGANIZATION TYPE:** Choose an item.

PROJECT INFORMATION

8. **PROJECT DESCRIPTION*:** Click or tap here to enter text.
9. **SITE NUMBERS** (Can add multiples by separating numbers out with a comma): Click or tap here to enter text.
10. **COUNTY***(Add multiples by separating names out with a comma): Click or tap here to enter text.
11. **BACKGROUND RESEARCH DONE:**
 - OSA Portal Query
 - MnDOT GIS
 - MnModel
 - Legacy Historic cemeteries
12. **KNOWN RESOURCES ADJACENT TO REVIEW AREA:**
 - Cemeteries
 - Burials
 - Archaeological Sites
13. **ADDITIONAL INFORMATION:** Click or tap here to enter text.

LOCATION INFORMATION* (If there are additional PLSS entries, please add a continuation sheet)

14. LOCATION INFORMATION (Complete this or Project Address if PLSS is not known):

PLSS - Township:	Range:	Range Direction (E or W):	Section:
PLSS - Township:	Range:	Range Direction (E or W):	Section:
PLSS - Township:	Range:	Range Direction (E or W):	Section:
PLSS - Township:	Range:	Range Direction (E or W):	Section:
PLSS - Township:	Range:	Range Direction (E or W):	Section:
PLSS - Township:	Range:	Range Direction (E or W):	Section:
PLSS - Township:	Range:	Range Direction (E or W):	Section:
PLSS - Township:	Range:	Range Direction (E or W):	Section:
PLSS - Township:	Range:	Range Direction (E or W):	Section:
PLSS - Township:	Range:	Range Direction (E or W):	Section:
PLSS - Township:	Range:	Range Direction (E or W):	Section:

15. ADDRESS (if PLSS is not known, please enter your project address):

- Address Line 1: Click or tap here to enter text.
- Address Line 2: Click or tap here to enter text.
- City: Click or tap here to enter text.
- State: Click or tap here to enter text.
- Zip Code: Click or tap here to enter text.

REQUESTOR INFORMATION

- 16. REQUESTED BY*:** Click or tap here to enter text.
- 17. REQUESTOR'S EMAIL ADDRESS*:** Click or tap here to enter text.
- 18. REQUESTOR'S PHONE NUMBER:** Click or tap here to enter text.
- 19. REQUESTOR'S PHYSICAL ADDRESS:**
 - Address Line 1: Click or tap here to enter text.
 - Address Line 2: Click or tap here to enter text.
 - City: Click or tap here to enter text.
 - State: Click or tap here to enter text.
 - Zip Code: Click or tap here to enter text.

ATTACHMENTS

Please add any pertinent photos, maps, or documents that are complimentary to the request which would assist us in fulfilling your request.

You can add attachments when you send this request electronically.

From: [Andrew Levi](#)
To: MIAC.culturalresources@state.mn.us
Cc: [Strohfus, Mark GRE-MG](#)
Subject: Otto Tap Transmission Line Project
Date: Monday, June 30, 2025 2:04:00 PM
Attachments: [image001.png](#)
[Review Form MIAC OttoTap 20250630.docx](#)
[01_GRE_Otto_Phase IA Letter Report 20250624.pdf](#)
[Otto Substation Fact Sheet 20250425.pdf](#)

Good day,

Great River Energy is proposing to construct approximately 2.9 miles of new single-circuit, 115-kilovolt high voltage transmission line within Otto and Pine Lake Townships in Otter Tail County, Minnesota (the Project). As part of the Project, Great River Energy will upgrade the existing Lake Region Electric Cooperative-owned Otto Substation. More information about the Project, along with a map, is available in the attached letter and fact sheet.

Great River Energy is planning to submit a Route Permit Application to the Minnesota Public Utilities Commission in late summer of 2025. Great River Energy would appreciate any comments you might have about the Project. Please reach out to Mark Strohfus with Great River Energy at 763-445-5210 or MStrohfus@GREnergy.com with questions, written comments, or a request for a meeting.

Thank you,

Andrew Levi [on behalf of Mark Strohfus, Great River Energy]

Andrew Levi

612.354.4280 direct

612-246-8581 mobile

andrew.levi@merjent.com



1 Main Street SE, Suite 300

Minneapolis, MN 55414

612.746.3660 main

www.merjent.com

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This is a fillable document. After completing this form, you can either save it and send it to us electronically, or you can print it, and then scan the completed form and send it to us electronically.

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Reason for Review – The user can add the reason they are submitting the review request.

Review Type – What is the type of review you are requesting.

Funding – If there is any funding attached to your request, please mark the appropriate selection.

Organization Name – If you are associated with an organization on whose behalf you are sending this request.

Submitting Organization Type – Please select the organization type you are associated with.

Project Description – Please write a detailed description of the project you would like reviewed.

Site Numbers – If you consulted the [State Archaeologist portal](#) and your proposed project intersected any sites add the site numbers as part of your request.

County – Please add the County(s) where the project is located.

Background Research Done – If you consulted any of the systems before sending this request.

Known Resources Adjacent to Review Area – If you are aware of any known cultural resources adjacent to your project area, please mark the selection(s) appropriately.

Additional Information – If there is any other additional information, you want us to know for us to work on your request.

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Requestor's Physical Address – Physical address of the person submitting the request [this will be used for communication purposes only].

Attachments - Please add any pertinent photos, maps, documents etc. to accompany your request.

REVIEW INFORMATION

1. PROJECT NAME*: Otto Tap Transmission Line Project
2. PROJECT ID: OttoTap
3. REASON FOR REVIEW*: Great River Energy is planning to submit a Route Permit Application to the Minnesota Public Utilities Commission in late summer of 2025. Great River Energy would appreciate any comments you might have about the Project.
4. REVIEW TYPE*: Review Request
5. FUNDING*: Private
6. ORGANIZATION NAME: Great River Energy
7. SUBMITTING ORGANIZATION TYPE: Private

PROJECT INFORMATION

8. PROJECT DESCRIPTION*: Great River Energy is proposing to construct approximately 2.9 miles of new single-circuit, 115-kilovolt high voltage transmission line within Otto and Pine Lake Townships in Otter Tail County, Minnesota (the Project). As part of the Project, Lake Region Electric Cooperative will upgrade its existing Otto Substation to receive 115-kV service. More information about the Project, along with a map, is available in the attached letter and fact sheet.

[NONPUBLIC DATA BEGINS HERE]

9. SITE NUMBERS (Can add multiples by separating numbers out with a comma): Site 21OT0049, Site 21OT0135, and Site 21OT0015 are located 

[NONPUBLIC DATA ENDS HERE]

10. COUNTY*(Add multiples by separating names out with a comma): Otter Tail

11. BACKGROUND RESEARCH DONE:

- OSA Portal Query
- MnDOT GIS
- MnModel

Legacy Historic cemeteries

12. KNOWN RESOURCES ADJACENT TO REVIEW AREA:

Cemeteries

Burials

Archaeological Sites

13. ADDITIONAL INFORMATION: The Otto Substation location was reviewed by Isaac Weston, Cultural Resource Manager, on January 27, 2025. At that time there were no known or suspected burial sites that might be affected by the substation expansion. On June 24, 2025, Merjent submitted a Phase Ia Cultural Resources Assessment to the Minnesota State Historic Preservation Office’s (SHPO) for the Otto Substation and the proposed transmission line. SHPO’s response to this letter is pending. The letter is attached to assist with your review.

LOCATION INFORMATION* (If there are additional PLSS entries, please add a continuation sheet)

14. LOCATION INFORMATION (Complete this or Project Address if PLSS is not known):

PLSS - Township:135	Range:38	Range Direction (E or W):W	Section:29
PLSS - Township:135	Range:38	Range Direction (E or W):W	Section:30
PLSS - Township:135	Range:38	Range Direction (E or W):W	Section:31
PLSS - Township:135	Range:38	Range Direction (E or W):W	Section:32
PLSS - Township:136	Range:38	Range Direction (E or W):W	Section:5
PLSS - Township:136	Range:38	Range Direction (E or W):W	Section:6
PLSS - Township:136	Range:38	Range Direction (E or W):W	Section:7
PLSS - Township:	Range:	Range Direction (E or W):	Section:
PLSS - Township:	Range:	Range Direction (E or W):	Section:
PLSS - Township:	Range:	Range Direction (E or W):	Section:

15. ADDRESS (if PLSS is not known, please enter your project address):

Address Line 1: Click or tap here to enter text.
 Address Line 2: Click or tap here to enter text.
 City: Click or tap here to enter text.
 State: Click or tap here to enter text.
 Zip Code: Click or tap here to enter text.

16.

REQUESTOR INFORMATION

17. REQUESTED BY*: Great River Energy

18. REQUESTOR's EMAIL ADDRESS*: andrew.levi@merjent.com

19. REQUESTOR's PHONE NUMBER: 612-354-4280

20. REQUESTOR's PHYSICAL ADDRESS:

Address Line 1: Merjent

Address Line 2: 1 Main Street SE, Suite 300

City: Minneapolis

State: MN

Zip Code: 55414

21.

ATTACHMENTS

Please add any pertinent photos, maps, or documents that are complimentary to the request which would assist us in fulfilling your request.

You can add attachments when you send this request electronically.

On June 24, 2025, Merjent submitted a Phase Ia Cultural Resources Assessment to the Minnesota State Historic Preservation Office (SHPO) for review. SHPO's response to this letter is pending. The letter is attached to assist with your review. A project fact sheet is also attached.



1 Main Street SE ■ Suite 300 ■ Minneapolis, Minnesota ■ 55414

June 24, 2025

Leslie Coburn
 Minnesota State Historic Preservation Office
 Administration Building #203
 50 Sherburne Ave.
 St. Paul, MN 55155
leslie.coburn@state.mn.us

Re: Great River Energy
 Otto Tap 115-kV Transmission Line Project
 Phase Ia Cultural Resources Assessment

Dear Ms. Coburn:

This letter presents the results of a file search completed in support of the Otto Tap 115 kilovolt (kV) Transmission Line Project (Project) in Otter Tail County, Minnesota. Great River Energy (GRE) proposes to construct a new tap line from its 115-kV Perham to Rush Lake (LR-PR) transmission line to Lake Region Electric Cooperative's (LREC) existing Otto Substation. LREC will then upgrade the Otto Substation to receive 115-kV service. This Project is needed to enable LREC to continue to provide reliable service by upgrading the Otto Substation with a connection to the 115-kV transmission system.

With this letter, Merjent, Inc., GRE's environmental consultant, is submitting the Phase Ia Cultural Resources Assessment for your review and comment. In order to adequately address resources that may be affected by the Project, a larger Study Area was created to establish context and understand nearby archaeological site density. The Study Area includes the Project Area plus an additional 1-mile buffer on each side of the transmission line and substation. The Study Area includes all or part of the following sections:

Table 1			
Sections included in the Project Study Area			
County	Township	Range	Sections
Otter Tail	136N	38W	19, 20, 29-33
Otter Tail	135N	38W	5-8

The Project route is collocated within existing distribution line right-of-way and immediately adjacent to disturbed township road right-of-way for approximately 2.9 miles in Otter Tail County.

REGULATORY FRAMEWORK

The Project, as a regulated high-voltage transmission line, requires a Route Permit from the Minnesota Public Utilities Commission. When Project development proceeds, we expect that the Minnesota Field Archaeology Act (Minn. Stat § 138.31-138.42) will apply to the Project. Regardless of specific permits required prior to construction, the Private Cemeteries Act (Minn. Stat § 307.08) will apply.

The Minnesota Field Archaeology Act (Minn. Stat § 138.32-138.42) establishes the Office of the State Archaeologist (OSA); requires licenses to engage in archaeology on nonfederal public land; establishes ownership, custody, and use of objects and data recovered during survey; and requires state agencies to submit development plans to the OSA, Minnesota State Historic Preservation Office (SHPO), and the Minnesota Indian Affairs Council for review when there are known or suspected archaeological sites in the area.

Minnesota's Private Cemeteries Act (Minn. Stat § 307.08) affords all human burial grounds and remains older than 50 years and located outside of platted or identified cemeteries protection from unauthorized disturbance. This statute applies to burials on either public or private lands or waters and includes prehistoric Indian burial mounds as well as historic cemeteries.

LITERATURE REVIEW

On February 12, 2025, Merjent reviewed previous survey reports on file at the SHPO office in St. Paul, Minnesota and on April 16, 2025, Merjent retrieved cultural resources site information (archaeological sites and historic structures) located on the online OSA Portal and the online Minnesota Historic Inventory Portal. Additionally, Merjent reviewed the General Land Office (GLO) maps and available historical aerial photography accessed online through the OSA Portal.¹ Enclosed Figures 1 and 2 show the features discussed below identified during this review.

[NONPUBLIC DATE BEGINS HERE]

Previously Recorded Archaeological Resources

According to the OSA Portal, there are three previously recorded archaeological sites within the Study Area. One recorded archaeological site intersects the Project. Site 21OT0049 is described [REDACTED]. This site has not been evaluated for the NRHP, however according to OSA records it was destroyed by [REDACTED] construction and the widening [REDACTED].

Two additional recorded archaeological sites are within the Study Area but are not crossed by the Project. Site 21OT0135 consists of a [REDACTED]. The site is located approximately [REDACTED] of the transmission line near where it enters the Otto Substation. This site remains Unevaluated for listing on the NRHP [REDACTED]. Site 21OT0015 consists of [REDACTED]. The site is located approximately [REDACTED] of the Project and is also Unevaluated for listing on the NRHP. Both of these sites will not be impacted due to distance.

Previously Recorded Archaeological Surveys

Merjent identified one previously conducted archaeological survey within the Study Area. Survey 96-0627² was conducted in support of a bridge replacement and associated road improvements

¹ OSA Portal. 2023. <https://osa.gisdata.mn.gov/OSAportal>. Accessed April 16, 2025.

² Blikre, Lowell R. and David G Stanley. 1996. A Phase I Cultural Resource Survey for the Proposed Bridge L0946 Replacement, and Associated Otto Township Road T-173 Improvements, Otter Tail County, Minnesota

in [REDACTED]. According to the SHPO files, the Project area has not been previously surveyed.

Historic Cemeteries

Merjent’s review of the OSA Portal identified records of three potential historic cemeteries within the Study Area (see Figure 1, page 2 of 2, and Table 2). These cemeteries were identified in historic records as being within [REDACTED]; however, their precise location has not been verified. If historic cemeteries contain extant headstones, fences, or other infrastructure they are identifiable on aerial photos as well as topographic maps.

Review of aerial photographs and topographic maps identified the precise location of one of the three potential cemeteries. The St. Lawrence Catholic Church Cemetery, [REDACTED], is located outside of the Study Area [REDACTED].

The precise locations of the other two potential cemeteries – the Cole Cemetery and Our Lady of Miracles Cemetery – were not identified during review of historic aerials, historic atlases, and topographic maps. The transmission line will enter the Otto Substation in the upper northeast corner of T135N, R38W, Section 7; therefore, it has the potential to overlap with the Cole Cemetery and Our Lady of Miracles Cemetery, which have not been located within [REDACTED].

[NONPUBLIC DATA ENDS HERE]

The Otto Substation is an existing substation which resulted in ground disturbance associated with the construction of the substation, the gravel lot, and the fence surrounding the substation. Ground disturbing work for the substation upgrade will occur within the property owned by LREC, and immediately south of the existing substation infrastructure. A new security fence will also be installed. Because the Cole Cemetery and Our Lady of Miracles Cemetery were not able to be located using desktop data, survey should be conducted to determine if either cemetery is located within this area of ground disturbance.

Table 2 Historic Cemeteries within the Project Study Area	
Cemetery Number	Cemetery Name
23049	Cole Cemetery
23050	Our Lady of Miracles Cemetery
22849	St. Lawrence Church Cemetery

Previously Recorded Standing Historic Buildings and Structures

Merjent’s review of the OSA Portal identified records of six historic structures within the Study Area, one of which overlaps the Project Area. Trunk Highway 10/US Highway 10 (Property Number XX-ROD-00040) intersects the northern end of the Project and has been determined not eligible for listing in the NRHP (Figure 1, page 1 of 2).

The remaining five structures are within the Study Area, but do not overlap the Project. These structures will not be impacted due to distance.



- The Main Line/Northern Pacific Railway Corridor Historic District (Property Number XX-RRD-NPR-0007/XX-RRD-NPR021) runs perpendicular and just north of the northern end of the Project (Figure 1, page 1 of 2). This structure is eligible for listing in the NRHP.
- Bridge No. 4748 (Property Number OT-PLT-00005) is located more than 0.4-mile north of the Project at the intersection of the Burlington Northern Railroad and Wavy Dr (Figure 1, page 1 of 2). This structure has not been evaluated for listing in the NRHP.
- Two structures are located more than 0.9-mile east of the Project at the intersection of Burlington Northern Railroad and US Highway 10. Both Bridge No. 56012 (Property Number OT-PLT-00004) and Bridge No. 56011 (Property Number OT-PLT-00003) have both been determined Not Eligible for listing in the NRHP. (Figure 1, page 1 of 2).
- Bridge No. L0946 (Property Number OT-OTO-00003) is located approximately 1 mile to the west of the Project (Figure 1, page 2 of 2). This structure remains Unevaluated for listing in the NRHP.

Property Number	Property Name	Type	NRHP Status
XX-ROD-00040	Trunk Highway 10	Road	Not Eligible
XX-RRD-NPR0007/XX-RRD-NPR021	Main Line/Northern Pacific Railway Corridor Historic District	Railroad District	Eligible
OT-PLT-00005	Bridge No. 4748	Bridge	Unevaluated
OT-PLT-00004	Bridge No. 56012	Bridge	Not Eligible
OT-PLT-00003	Bridge No. 56011	Bridge	Not Eligible
OT-OTO-00003	Bridge No. L0946	Bridge	Unevaluated

General Land Office and Aerial Photo Review

Merjent reviewed nineteenth-century GLO maps and notes on file with the Bureau of Land Management³. The GLO map of the Project Area illustrated conditions in 1870 as being prairie, with several lakes and/or wetlands and connecting streams and rivers. No historic features were identified within the Project area. An unnamed linear feature, presumably a road or trail is present along the east bank of the Otter Tail River, approximately 1 mile to the west of the Project. Aerial photographs from 1939, 1963, and the present all show that the current road system, the aforementioned railroad (The Main Line/Northern Pacific Railway Corridor Historic District), and farms have been established, with agricultural fields dominating the landscape. There is no trace of the GLO road or trail on historic aerials; by 1939 it had been overtaken by agricultural fields. Subsequent historic and modern aerial photographs following 1963 show that the landscape of the Project area has remained largely unchanged.

SUMMARY AND RECOMMENDATIONS

Three previously recorded archaeological sites, three potential historic cemeteries, and six historic structures were identified within the Study Area. One archaeological site intersects the

³ Bureau of Land Management General Land Office Records. 2024. <https://glorerecords.blm.gov/>

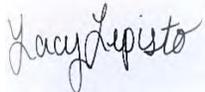
Project, but it has been destroyed due to road construction. Two historic cemeteries potentially overlap the Project according to historic documents but could not be located using desktop resources. Survey should occur in the area of disturbance to confirm that neither potential cemetery is within the Project Area. One historic structure intersects the Project, but it has already been determined Not Eligible for listing on the NRHP.

There is potential for precontact and historic-period sites within the Project Area; however, given that the Project is proposed within already disturbed road and utility rights-of-way, there is a low potential for intact archaeological sites. Mn Model4 indicates that the Project and surrounding area has unknown archaeological site potential, suggesting that the low recorded site density of the area may be due to the lack of previous survey. Given there is potential for unrecorded archaeological sites and historic cemeteries within the Project, and because the Project consists of a newly constructed aboveground transmission line and substation upgrades, Merjent recommends that a Phase I Archaeological Survey be completed for the Project. This work should comply with the *State Archaeologist's Manual for Archaeological Projects in Minnesota* (Anfinson 2011) and the *Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation* (National Park Service 1983).

If human remains are encountered during construction activities, all ground disturbing activity must cease, and local law enforcement must be notified per Minn. Stat § 307.08. GRE will also develop an Unanticipated Discoveries Plan for the Project.

If you have any questions regarding this memorandum, please do not hesitate to contact me at lacy.lepisto@merjent.com.

Sincerely,



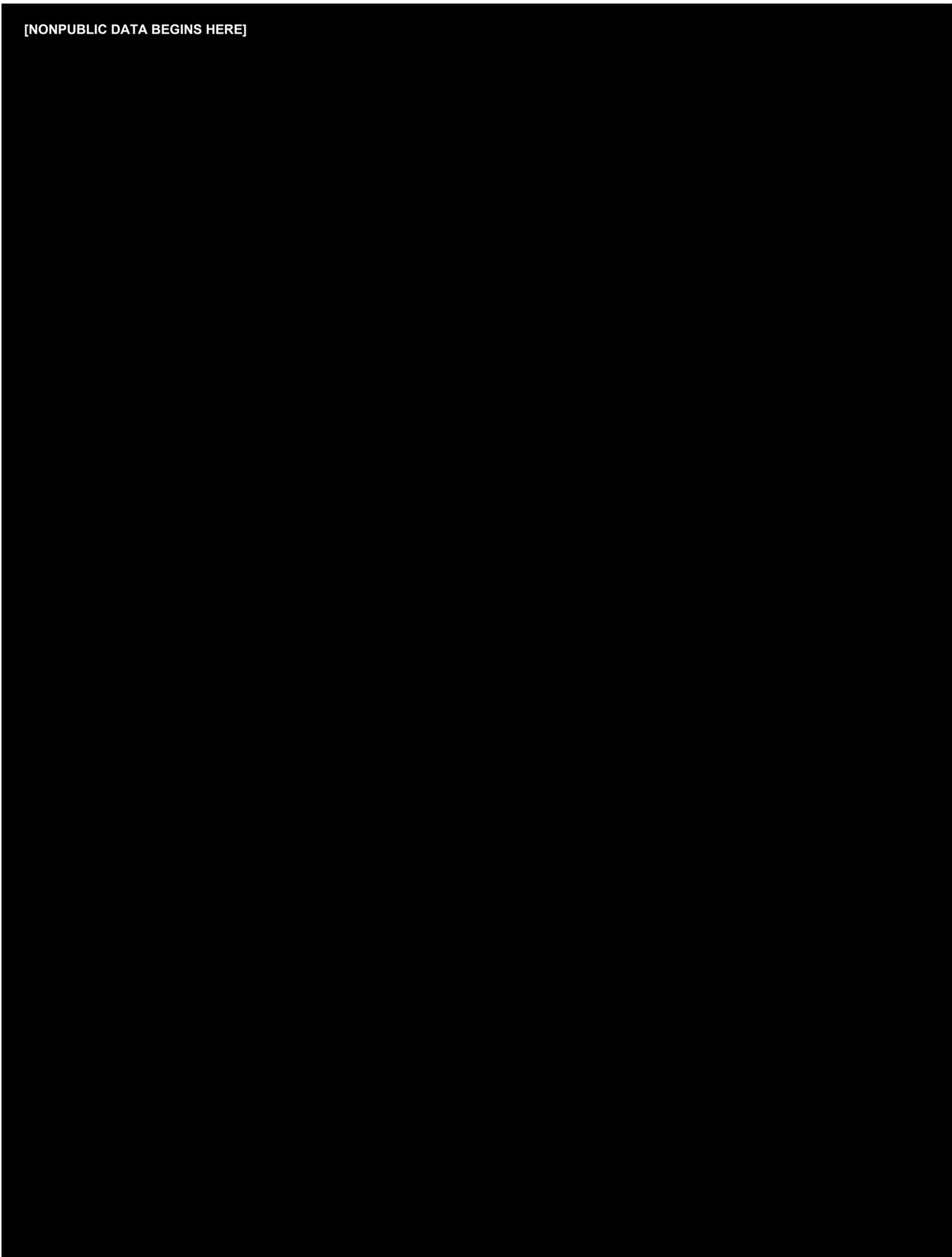
Lacy Lepisto
Cultural Resource Specialist
Merjent, Inc.

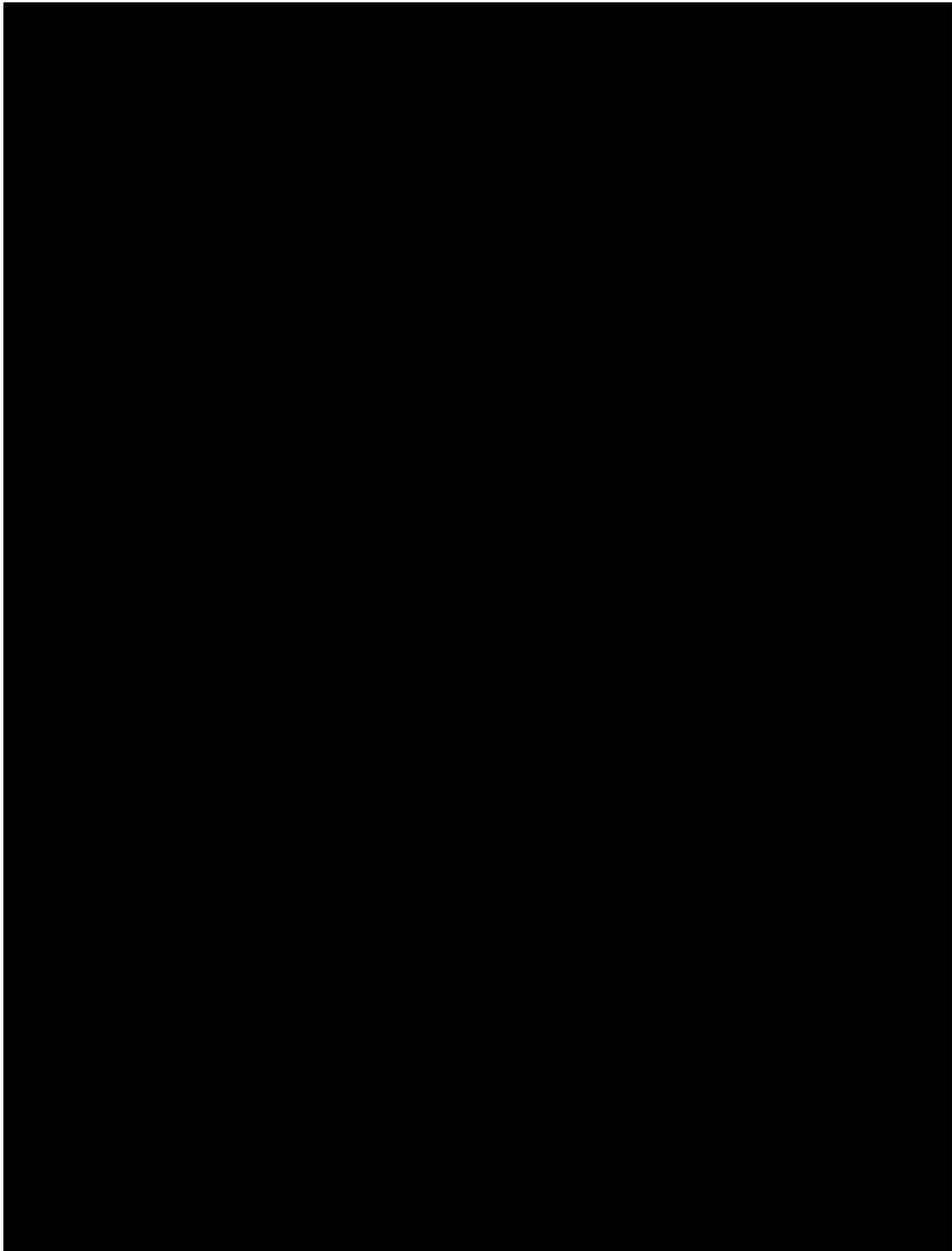
Enclosed:

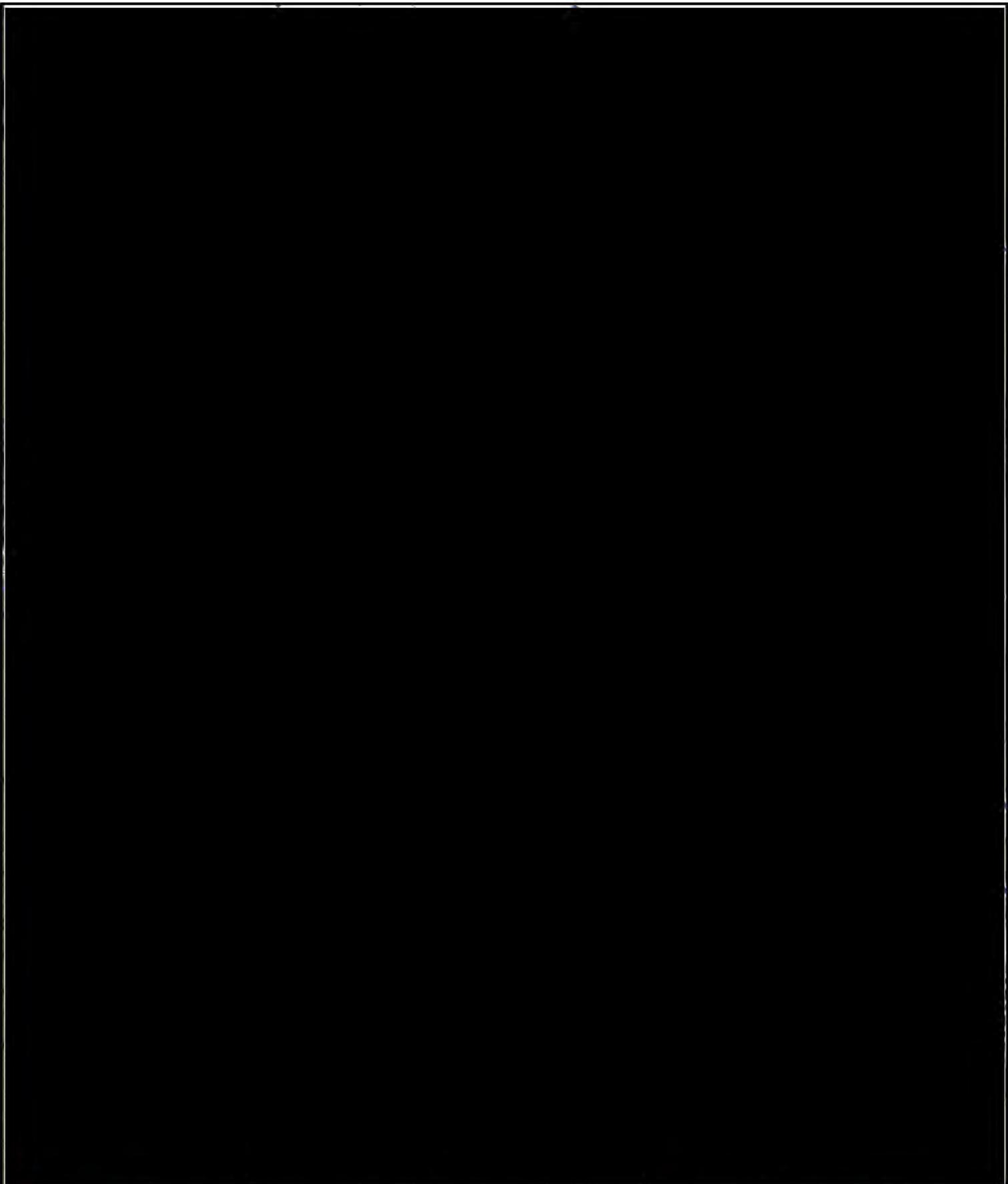
Figure 1 Topographic Map (*Contains Confidential and Privileged Information*)
Figure 2 Aerial Map (*Contains Confidential and Privileged Information*)

cc: Mark Strohfus, Great River Energy
 Andrew Levi, Merjent
 Bill Harding, Merjent

[NONPUBLIC DATA BEGINS HERE]







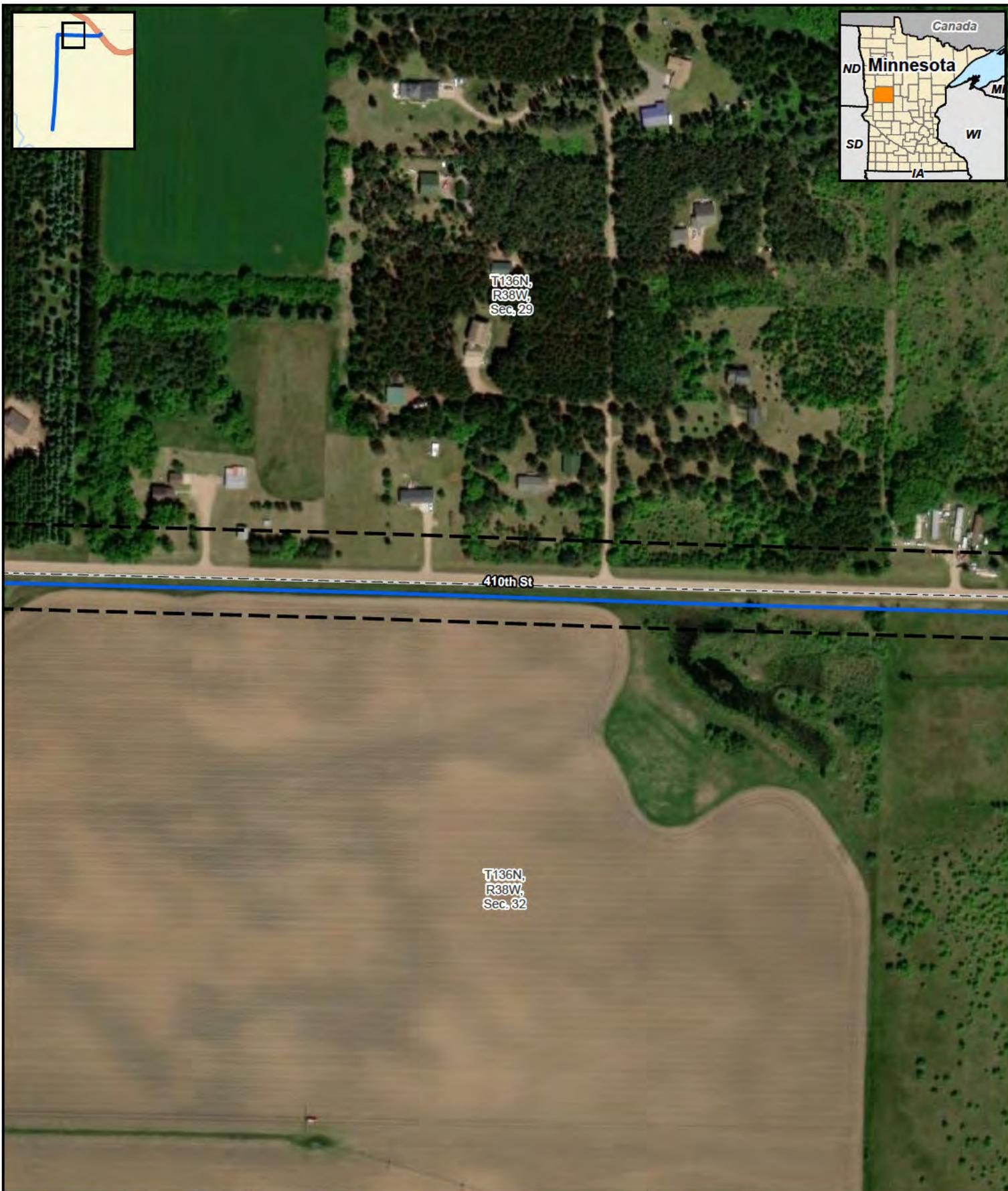
0 150 300 Feet
1:3,600

For Environmental Review Purposes Only

Figure 2: Project Detail
Great River Energy
Otto Tap 115-kV Transmission Line Project
Otter Tail County, Minnesota
Page 1 of 6

-  Proposed 115-kV Transmission Line
-  Route Width
-  Great River Energy Transmission Line
-  Historic Site
-  [Redacted]
-  Section Boundary

Drawing: 19-00000001-001



T136N,
R38W,
Sec. 29

410th St

T136N,
R38W,
Sec. 32



0 150 300 Feet
1:3,600



For Environmental Review Purposes Only

Figure 2: Project Detail
Great River Energy
Otto Tap 115-kV Transmission Line Project
Otter Tail County, Minnesota
Page 2 of 6

Proposed 115-kV
Transmission Line

Route Width
Section Boundary

Source: (02/20/2025)

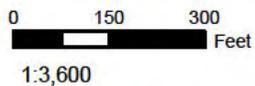
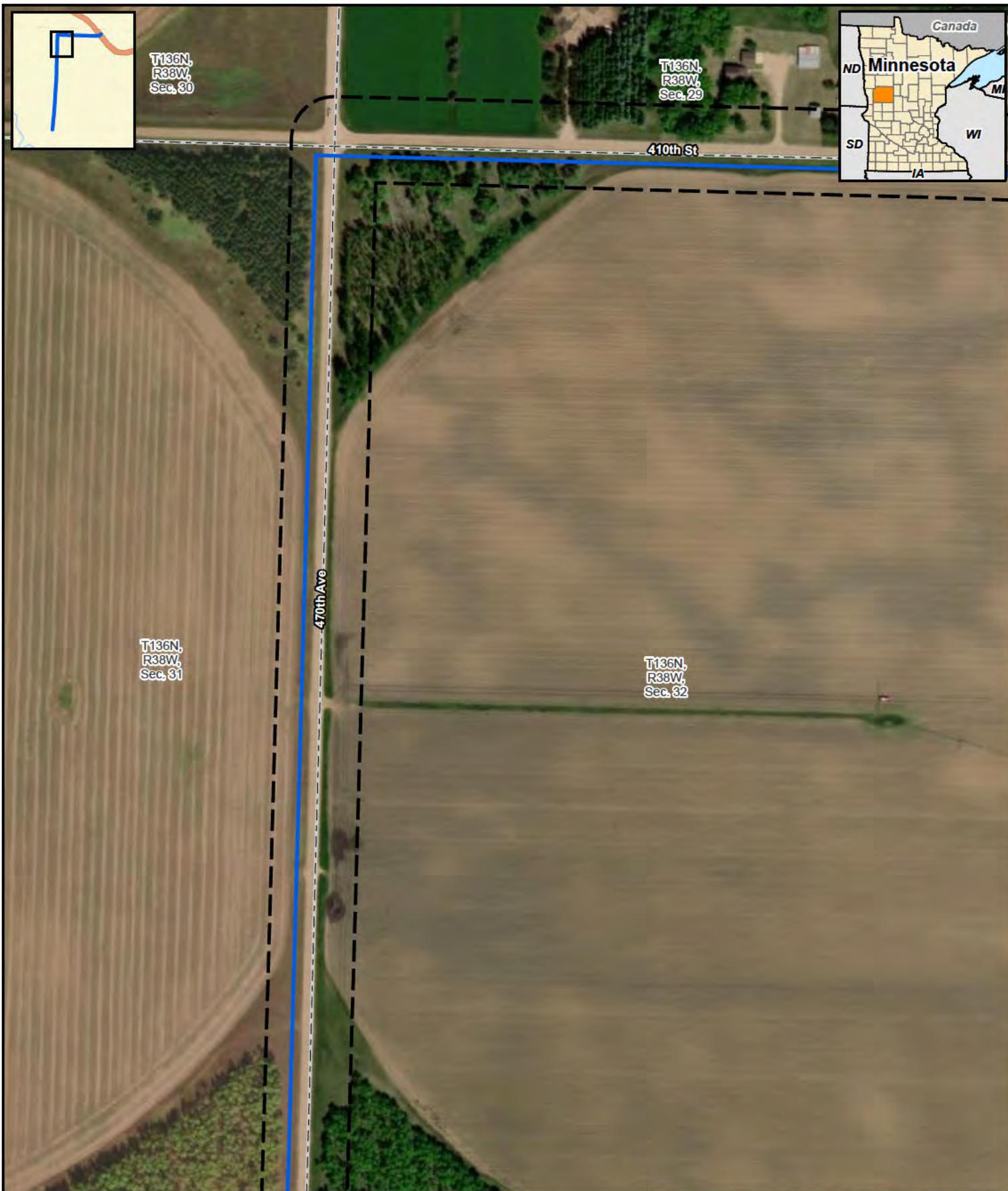


Figure 2: Project Detail
Great River Energy
Otto Tap 115-kV Transmission Line Project
 Otter Tail County, Minnesota
 Page 3 of 6

Proposed 115-kV
Transmission Line

Route Width
Section Boundary



merjent.

0 150 300 Feet

1:3,600

For Environmental Review Purposes Only

Figure 2: Project Detail
Great River Energy
Otto Tap 115-kV Transmission Line Project
Otter Tail County, Minnesota
Page 4 of 6

— Proposed 115-kV Transmission Line

— Route Width

— Section Boundary

Date: 02/20/2025 Source:



0 150 300 Feet

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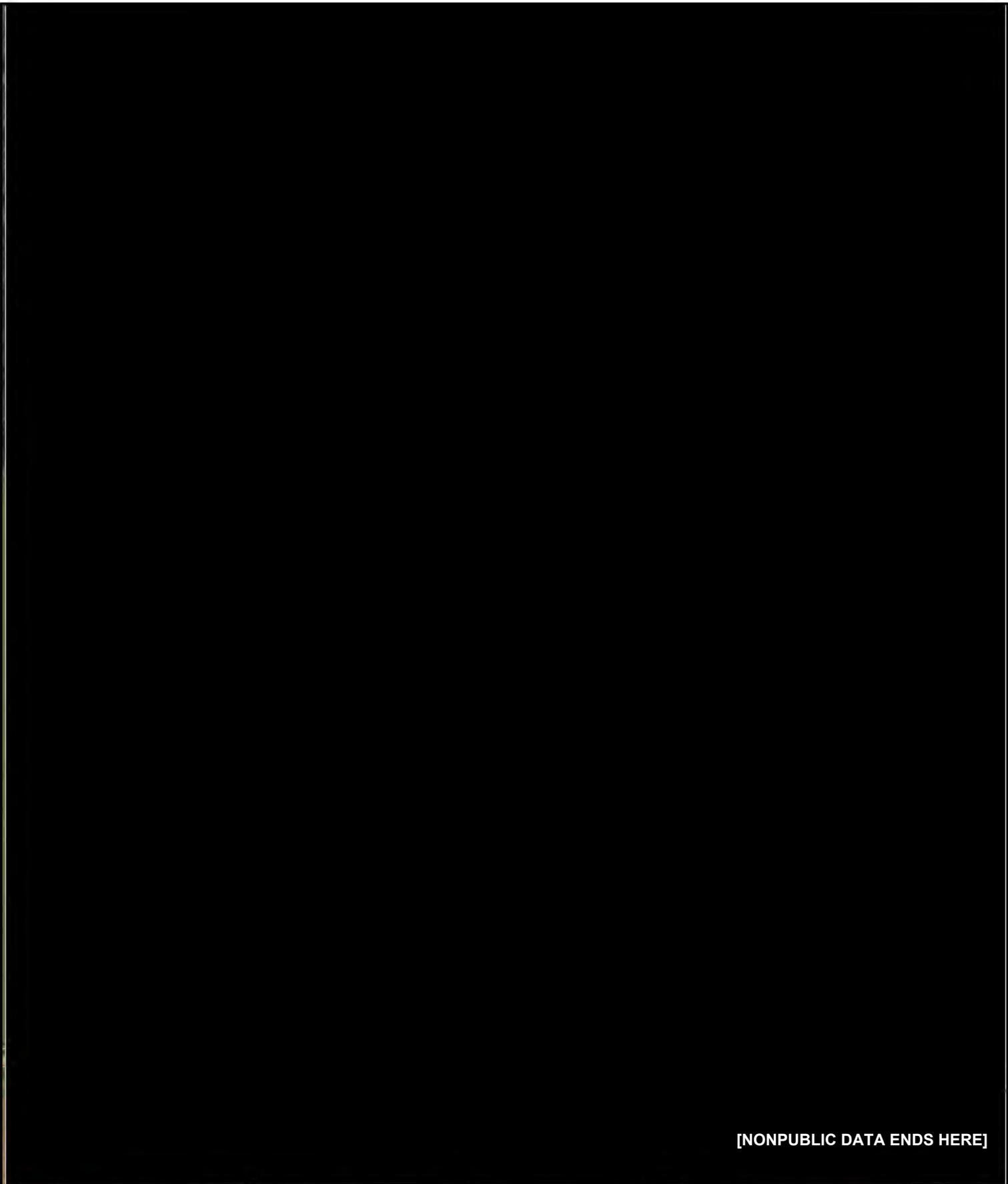
For Environmental Review Purposes Only

Figure 2: Project Detail
 Great River Energy
 Otto Tap 115-kV Transmission Line Project
 Otter Tail County, Minnesota
 Page 5 of 6

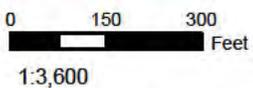
Proposed 115-kV
 Transmission Line

Route Width
 Section Boundary

Date: 02/20/2025 Source:



[NONPUBLIC DATA ENDS HERE]



For Environmental Review Purposes Only

Figure 2: Project Detail
Great River Energy
Otto Tap 115-kV Transmission Line Project
Otter Tail County, Minnesota
Page 6 of 6

- Substation
- Proposed 115-kV Transmission Line
- Proposed Substation Footprint
- Route Width
- Great River Energy Transmission Line
- Foreign Transmission Line

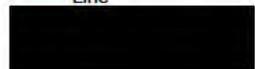


Figure 2: Project Detail



GREAT RIVER ENERGY

Great River Energy
 12300 Elm Creek Blvd
 Maple Grove, MN 55369
 763-445-5000
 grenergy.com



Lake Region Electric Cooperative
 1401 S Broadway
 Pelican Rapids, MN 56572
 1800-552-7658
 lrec.coop

Otto Substation transmission tap line

Great River Energy, wholesale electric provider to Lake Region Electric Cooperative, is planning to build approximately 2.9 miles of new 115,000-volt (115-kilovolt or 115-kV) overhead transmission line in Otto and Pine Lake Townships, in Ottertail County. A transmission tap to the existing Perham–Rush Lake (LR-PR) 115-kV line is necessary to support Lake Region Electric Cooperative’s upgrade of the Otto Substation. This will ensure continued reliable service by connecting the new substation to the regional 115-kV transmission system.

Overview

This project will include the construction of approximately 2.9 miles of transmission line between the existing Otto Substation and Great River Energy’s existing LR-PR 115-kV transmission line located on the northeast side of US Highway 10. See map on back. From the Otto Substation, the proposed route would follow 470th Avenue north. At 410th Street it will turn east until it crosses over US Highway 10 to a new switch to be installed on the existing 115-kV line. LREC will likely bury most of their existing distribution lines where they are overtaken by the new 115-kV transmission line.

Permits

The project will require a route permit from the Minnesota Public Utilities Commission prior to any construction commencing. There will be several opportunities for any interested party to provide comments during the state’s permitting process.



Typical 115-kV single circuit structure and 115-kV deadend

In addition, Great River Energy will work with other state, county, townships and local authorities to acquire all approvals necessary to complete the work.

Public involvement and easements

Great River Energy will be contacting landowners to talk with them about the project. Easements will be needed to provide adequate land rights for construction, operation and maintenance of the new line.

Landowners will be presented with a copy of the route permit, easement and compensation settlement offer. Information will also be provided on the proposed design and pole locations, tree removal, construction access, settlement of damages and restoration of the right-of-way.

Schedule

Notifications	Winter 2024
Project permitting	2025 – Fall 2026
Survey/design	Winter 2027 – Winter 2028
Easements/ Environmental permits	Spring – Fall 2027
Transmission line construction	Fall 2027 – Fall 2028
Energization	Fall 2028

Quick facts

- Length** – Approximately 2.9 miles
- Voltage** – 115 kV
- Structures** – Direct-embedded wood or steel poles; steel on concrete foundations at corners
- Spans** – 350 to 400 feet apart
- Right of way** – 100-foot-wide (50 feet each side of center of pole line)

Minnesota Office of Pipeline Safety

From: [Andrew Levi](#)
To: jonathan.wolfgram@state.mn.us
Cc: [Strohfus, Mark GRE-MG](#)
Subject: Great River Energy Otto Tap 115 kV Transmission Line Project
Date: Thursday, September 11, 2025 2:00:00 PM
Attachments: [GRE_OttoTap_JonathanWolfgram_20250910.pdf](#)
[image001.png](#)

Dear Jonathan Wolfgram,

Great River Energy is proposing to construct approximately 2.9 miles of new single-circuit, 115- kilovolt high voltage transmission line within Otto and Pine Lake Townships in Otter Tail County, Minnesota (the Project). As part of the Project, Great River Energy will replace the existing Lake Region Electric Cooperative-owned Otto Substation. More information about the Project, along with a map, is available in the attached letter and fact sheet.

Great River Energy is planning to submit a Route Permit Application to the Minnesota Public Utilities Commission in late summer of 2025. Great River Energy would appreciate any comments you might have about the Project. Please reach out to Mark Strohfus with Great River Energy at 763-445-5210 or MStrohfus@GREnergy.com with questions, written comments, or a request for a meeting.

Thank you,

Andrew Levi [on behalf of Mark Strohfus, Great River Energy]

Andrew Levi

612.354.4280 direct

612-246-8581 mobile

andrew.levi@merjent.com



1 Main Street SE, Suite 300

Minneapolis, MN 55414

612.746.3660 main

www.merjent.com

Minnesota Pollution Control Agency

From: [Andrew Levi](#)
To: [Green, Chris \(MPCA\)](#)
Cc: [Strohfus, Mark GRE-MG](#)
Subject: RE: EXTERNAL: RE: Great River Energy -- Otto Tap 115 kV Transmission Line Project
Date: Friday, May 23, 2025 10:23:00 AM
Attachments: [image001.png](#)

Chris,

Thank you for your email. We look forward to your review and comment at a later date.

--Andrew

Andrew Levi

612.354.4280 direct
612-246-8581 mobile
andrew.levi@merjent.com



1 Main Street SE, Suite 300
Minneapolis, MN 55414
612.746.3660 main
www.merjent.com

From: Green, Chris (MPCA) <chris.green@state.mn.us>
Sent: Sunday, May 18, 2025 8:40 PM
To: Andrew Levi <andrew.levi@merjent.com>
Cc: Strohfus, Mark GRE-MG <MStrohfu@GREnergy.com>
Subject: EXTERNAL: RE: Great River Energy -- Otto Tap 115 kV Transmission Line Project

CAUTION: This email originated from outside of Merjent.

Hi Andrew,

Thank you for the heads up. We typically do not comment/review projects until they have an associated project document, such as an EA/EAW/EIS/etc.

We look forward to those documents should they arise. If you have any questions or concerns, feel free to reach out,

Chris Green

Project Manager
Environmental Review
Minnesota Pollution Control Agency
504 Fairgrounds Rd Suite 200
Marshall MN 56258-1688
Office: 507-476-4258
Cell: 507-696-9718
Chris.Green@state.mn.us

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From: Andrew Levi <andrew.levi@merjent.com>
Sent: Monday, May 12, 2025 11:02 AM
To: Green, Chris (MPCA) <chris.green@state.mn.us>
Cc: Strohfus, Mark GRE-MG <MStrohfu@GREnergy.com>
Subject: Great River Energy -- Otto Tap 115 kV Transmission Line Project

You don't often get email from andrew.levi@merjent.com. [Learn why this is important](#)

This message may be from an external email source.

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

Dear Chris Green,

Great River Energy is proposing to construct approximately 2.9 miles of new single-circuit, 115-kilovolt high voltage transmission line within Otto and Pine Lake Townships in Otter Tail County, Minnesota (the Project). As part of the Project, Great River Energy will upgrade the existing Lake Region Electric Cooperative-owned Otto Substation. More information about the Project, along with a map, is available in the attached letter and fact sheet.

Great River Energy is planning to submit a Route Permit Application to the Minnesota Public Utilities Commission in late summer of 2025. Great River Energy would appreciate any comments you might have about the Project. Please reach out to Mark Strohfus with Great River Energy at 763-445-5210 or MStrohfu@GREnergy.com with questions, written comments, or a request for a meeting.

Thank you,

Andrew Levi [on behalf of Mark Strohfus, Great River Energy]

Andrew Levi

612.354.4280 direct

612-246-8581 mobile

andrew.levi@merjent.com



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Minneapolis, MN 55414
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Minnesota State Historic Preservation Office



August 1, 2025

Lacy Lepisto
Cultural Resource Specialist
Merjent, Inc.
lacy.lepisto@merjent.com

RE: Great River Energy Otto Tap 115 kV Transmission Line Project
Otter Tail County
SHPO Number: 2025-1377

Dear Lacy Lepisto:

Thank you for the opportunity to comment on the above referenced project. We understand that this project will require a Minnesota Public Utilities Commission route permit. Therefore, the submitted information has been reviewed pursuant to the responsibilities given the State Historic Preservation Office by the Minnesota Historic Sites Act (138.665-666). If this project will be located on non-federal public land, the project will also be subject to review under the Minnesota Field Archaeology Act.

According to your correspondence, Great River Energy is proposing to construct a new tap line from its 115 kV Perham to Rush Lake (LR-PR) transmission line to Lake Region Electric Cooperative's existing Otto Substation. The project route is collocated within existing distribution line right-of-way and immediately adjacent to township road right-of-way.

We have reviewed the Phase Ia Cultural Resources Assessment letter report (June 24, 2025) as prepared by Merjent, Inc. Based on a review of available information we agree with Merjent's recommendation that an archaeological survey should be completed. The report states that the proposed project crosses through archaeological site [REDACTED] which has been reported destroyed in a site form in the Office of the State Archaeologist's Portal. The report of the site's destruction does not appear to be dated and does not appear to be associated with an archaeological survey report; therefore, the site's destruction has not been verified. We recommend that the survey include an evaluation of this site. The survey must meet the requirements of the Secretary of the Interior's Standards for Identification and Evaluation and should include an evaluation of National Register eligibility for any properties that are identified.

Please note that this comment letter does not address the requirements of Section 106 of the National Historic Preservation Act of 1966 and 36 CFR § 800. If this project is considered for federal financial assistance, or requires a federal permit or license, then review and consultation with our office will need to be initiated by the lead federal agency. Be advised that comments and recommendations provided by our office for this state-level review may differ from findings and determinations made by the federal agency as part of review and consultation under Section 106.

If you have any general questions regarding our review of this project, please contact me at 651-201-3285 or kelly.graggjohnson@state.mn.us. For questions regarding archaeology, please contact Lucy Harrington, Environmental Review Archaeologist, at (651) 201-3283 or lucy.harrington@state.mn.us.

Sincerely,

Kelly Gragg-Johnson

Kelly Gragg-Johnson
Environmental Review Specialist

MINNESOTA STATE HISTORIC PRESERVATION OFFICE

50 Sherburne Avenue ■ Administration Building 203 ■ Saint Paul, Minnesota 55155 ■ 651-201-3287 mn.gov/admin/shpo ■ mnshpo@state.mn.us

AN EQUAL OPPORTUNITY AND SERVICE PROVIDER

From: [Lacy Lepisto](#)
To: [MN_ADM_ENV_Review_SHPO](#)
Cc: [Andrew Levi](#); [Bill Harding](#); [Strohfus, Mark GRE-MG](#)
Subject: Otto Tap 115-kV Transmission Line Project Submittal
Date: Tuesday, June 24, 2025 11:18:19 AM
Attachments: [01_GRE_Otto_Phase_IA_Letter_Report_20250624.pdf](#)
[image001.png](#)

Hello,

I have attached the Phase Ia letter report of the abovementioned project for your review.

Respectfully,

Lacy Lepisto (she/her)
612.924.3983 direct
319.759.3261 mobile
lacy.lepisto@merjent.com



1 Main Street SE, Suite 300
Minneapolis, MN 55414
612.746.3660 main
www.merjent.com



1 Main Street SE ■ Suite 300 ■ Minneapolis, Minnesota ■ 55414

June 24, 2025

Leslie Coburn
 Minnesota State Historic Preservation Office
 Administration Building #203
 50 Sherburne Ave.
 St. Paul, MN 55155
leslie.coburn@state.mn.us

Re: Great River Energy
 Otto Tap 115-kV Transmission Line Project
 Phase Ia Cultural Resources Assessment

Dear Ms. Coburn:

This letter presents the results of a file search completed in support of the Otto Tap 115 kilovolt (kV) Transmission Line Project (Project) in Otter Tail County, Minnesota. Great River Energy (GRE) proposes to construct a new tap line from its 115-kV Perham to Rush Lake (LR-PR) transmission line to Lake Region Electric Cooperative’s (LREC) existing Otto Substation. LREC will then upgrade the Otto Substation to receive 115-kV service. This Project is needed to enable LREC to continue to provide reliable service by upgrading the Otto Substation with a connection to the 115-kV transmission system.

With this letter, Merjent, Inc., GRE’s environmental consultant, is submitting the Phase Ia Cultural Resources Assessment for your review and comment. In order to adequately address resources that may be affected by the Project, a larger Study Area was created to establish context and understand nearby archaeological site density. The Study Area includes the Project Area plus an additional 1-mile buffer on each side of the transmission line and substation. The Study Area includes all or part of the following sections:

Table 1			
Sections included in the Project Study Area			
County	Township	Range	Sections
Otter Tail	136N	38W	19, 20, 29-33
Otter Tail	135N	38W	5-8

The Project route is collocated within existing distribution line right-of-way and immediately adjacent to disturbed township road right-of-way for approximately 2.9 miles in Otter Tail County.

REGULATORY FRAMEWORK

The Project, as a regulated high-voltage transmission line, requires a Route Permit from the Minnesota Public Utilities Commission. When Project development proceeds, we expect that the Minnesota Field Archaeology Act (Minn. Stat § 138.31-138.42) will apply to the Project. Regardless of specific permits required prior to construction, the Private Cemeteries Act (Minn. Stat § 307.08) will apply.

The Minnesota Field Archaeology Act (Minn. Stat § 138.32-138.42) establishes the Office of the State Archaeologist (OSA); requires licenses to engage in archaeology on nonfederal public land; establishes ownership, custody, and use of objects and data recovered during survey; and requires state agencies to submit development plans to the OSA, Minnesota State Historic Preservation Office (SHPO), and the Minnesota Indian Affairs Council for review when there are known or suspected archaeological sites in the area.

Minnesota's Private Cemeteries Act (Minn. Stat § 307.08) affords all human burial grounds and remains older than 50 years and located outside of platted or identified cemeteries protection from unauthorized disturbance. This statute applies to burials on either public or private lands or waters and includes prehistoric Indian burial mounds as well as historic cemeteries.

LITERATURE REVIEW

On February 12, 2025, Merjent reviewed previous survey reports on file at the SHPO office in St. Paul, Minnesota and on April 16, 2025, Merjent retrieved cultural resources site information (archaeological sites and historic structures) located on the online OSA Portal and the online Minnesota Historic Inventory Portal. Additionally, Merjent reviewed the General Land Office (GLO) maps and available historical aerial photography accessed online through the OSA Portal.¹ Enclosed Figures 1 and 2 show the features discussed below identified during this review.

[NONPUBLIC DATE BEGINS HERE]

Previously Recorded Archaeological Resources

According to the OSA Portal, there are three previously recorded archaeological sites within the Study Area. One recorded archaeological site intersects the Project. Site 21OT0049 is described [REDACTED]. This site has not been evaluated for the NRHP, however according to OSA records it was destroyed by [REDACTED] construction and the widening [REDACTED].

Two additional recorded archaeological sites are within the Study Area but are not crossed by the Project. Site 21OT0135 consists of a [REDACTED]. The site is located approximately [REDACTED] of the transmission line near where it enters the Otto Substation. This site remains Unevaluated for listing on the NRHP [REDACTED]. Site 21OT0015 consists of [REDACTED]. The site is located approximately [REDACTED] of the Project and is also Unevaluated for listing on the NRHP. Both of these sites will not be impacted due to distance.

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² Blikre, Lowell R. and David G Stanley. 1996. A Phase I Cultural Resource Survey for the Proposed Bridge L0946 Replacement, and Associated Otto Township Road T-173 Improvements, Otter Tail County, Minnesota

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Merjent's review of the OSA Portal identified records of three potential historic cemeteries within the Study Area (see Figure 1, page 2 of 2, and Table 2). These cemeteries were identified in historic records as being within [REDACTED]; however, their precise location has not been verified. If historic cemeteries contain extant headstones, fences, or other infrastructure they are identifiable on aerial photos as well as topographic maps.

Review of aerial photographs and topographic maps identified the precise location of one of the three potential cemeteries. The St. Lawrence Catholic Church Cemetery, [REDACTED], is located outside of the Study Area [REDACTED].

The precise locations of the other two potential cemeteries – the Cole Cemetery and Our Lady of Miracles Cemetery – were not identified during review of historic aerials, historic atlases, and topographic maps. The transmission line will enter the Otto Substation in the upper northeast corner of T135N, R38W, Section 7; therefore, it has the potential to overlap with the Cole Cemetery and Our Lady of Miracles Cemetery, which have not been located within [REDACTED].

[NONPUBLIC DATA ENDS HERE]

The Otto Substation is an existing substation which resulted in ground disturbance associated with the construction of the substation, the gravel lot, and the fence surrounding the substation. Ground disturbing work for the substation upgrade will occur within the property owned by LREC, and immediately south of the existing substation infrastructure. A new security fence will also be installed. Because the Cole Cemetery and Our Lady of Miracles Cemetery were not able to be located using desktop data, survey should be conducted to determine if either cemetery is located within this area of ground disturbance.

Cemetery Number	Cemetery Name
23049	Cole Cemetery
23050	Our Lady of Miracles Cemetery
22849	St. Lawrence Church Cemetery

Previously Recorded Standing Historic Buildings and Structures

Merjent's review of the OSA Portal identified records of six historic structures within the Study Area, one of which overlaps the Project Area. Trunk Highway 10/US Highway 10 (Property Number XX-ROD-00040) intersects the northern end of the Project and has been determined not eligible for listing in the NRHP (Figure 1, page 1 of 2).

The remaining five structures are within the Study Area, but do not overlap the Project. These structures will not be impacted due to distance.

- The Main Line/Northern Pacific Railway Corridor Historic District (Property Number XX-RRD-NPR-0007/XX-RRD-NPR021) runs perpendicular and just north of the northern end of the Project (Figure 1, page 1 of 2). This structure is eligible for listing in the NRHP.
- Bridge No. 4748 (Property Number OT-PLT-00005) is located more than 0.4-mile north of the Project at the intersection of the Burlington Northern Railroad and Wavy Dr (Figure 1, page 1 of 2). This structure has not been evaluated for listing in the NRHP.
- Two structures are located more than 0.9-mile east of the Project at the intersection of Burlington Northern Railroad and US Highway 10. Both Bridge No. 56012 (Property Number OT-PLT-00004) and Bridge No. 56011 (Property Number OT-PLT-00003) have both been determined Not Eligible for listing in the NRHP. (Figure 1, page 1 of 2).
- Bridge No. L0946 (Property Number OT-OTO-00003) is located approximately 1 mile to the west of the Project (Figure 1, page 2 of 2). This structure remains Unevaluated for listing in the NRHP.

Property Number	Property Name	Type	NRHP Status
XX-ROD-00040	Trunk Highway 10	Road	Not Eligible
XX-RRD-NPR0007/XX-RRD-NPR021	Main Line/Northern Pacific Railway Corridor Historic District	Railroad District	Eligible
OT-PLT-00005	Bridge No. 4748	Bridge	Unevaluated
OT-PLT-00004	Bridge No. 56012	Bridge	Not Eligible
OT-PLT-00003	Bridge No. 56011	Bridge	Not Eligible
OT-OTO-00003	Bridge No. L0946	Bridge	Unevaluated

General Land Office and Aerial Photo Review

Merjent reviewed nineteenth-century GLO maps and notes on file with the Bureau of Land Management³. The GLO map of the Project Area illustrated conditions in 1870 as being prairie, with several lakes and/or wetlands and connecting streams and rivers. No historic features were identified within the Project area. An unnamed linear feature, presumably a road or trail is present along the east bank of the Otter Tail River, approximately 1 mile to the west of the Project. Aerial photographs from 1939, 1963, and the present all show that the current road system, the aforementioned railroad (The Main Line/Northern Pacific Railway Corridor Historic District), and farms have been established, with agricultural fields dominating the landscape. There is no trace of the GLO road or trail on historic aerials; by 1939 it had been overtaken by agricultural fields. Subsequent historic and modern aerial photographs following 1963 show that the landscape of the Project area has remained largely unchanged.

SUMMARY AND RECOMMENDATIONS

Three previously recorded archaeological sites, three potential historic cemeteries, and six historic structures were identified within the Study Area. One archaeological site intersects the

³ Bureau of Land Management General Land Office Records. 2024. <https://glorerecords.blm.gov/>

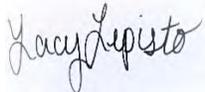
Project, but it has been destroyed due to road construction. Two historic cemeteries potentially overlap the Project according to historic documents but could not be located using desktop resources. Survey should occur in the area of disturbance to confirm that neither potential cemetery is within the Project Area. One historic structure intersects the Project, but it has already been determined Not Eligible for listing on the NRHP.

There is potential for precontact and historic-period sites within the Project Area; however, given that the Project is proposed within already disturbed road and utility rights-of-way, there is a low potential for intact archaeological sites. Mn Model4 indicates that the Project and surrounding area has unknown archaeological site potential, suggesting that the low recorded site density of the area may be due to the lack of previous survey. Given there is potential for unrecorded archaeological sites and historic cemeteries within the Project, and because the Project consists of a newly constructed aboveground transmission line and substation upgrades, Merjent recommends that a Phase I Archaeological Survey be completed for the Project. This work should comply with the *State Archaeologist's Manual for Archaeological Projects in Minnesota* (Anfinson 2011) and the *Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation* (National Park Service 1983).

If human remains are encountered during construction activities, all ground disturbing activity must cease, and local law enforcement must be notified per Minn. Stat § 307.08. GRE will also develop an Unanticipated Discoveries Plan for the Project.

If you have any questions regarding this memorandum, please do not hesitate to contact me at lacy.lepisto@merjent.com.

Sincerely,



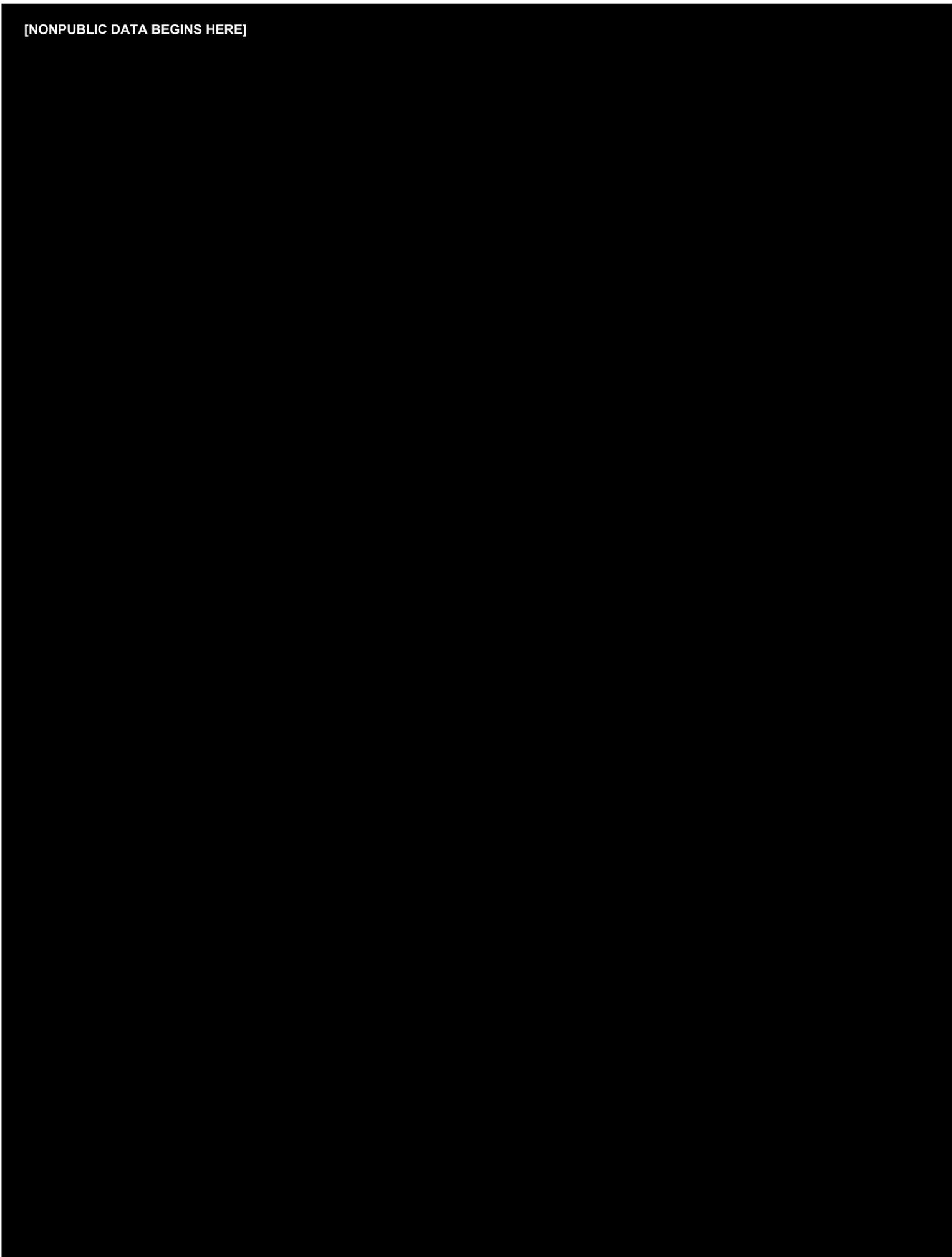
Lacy Lepisto
Cultural Resource Specialist
Merjent, Inc.

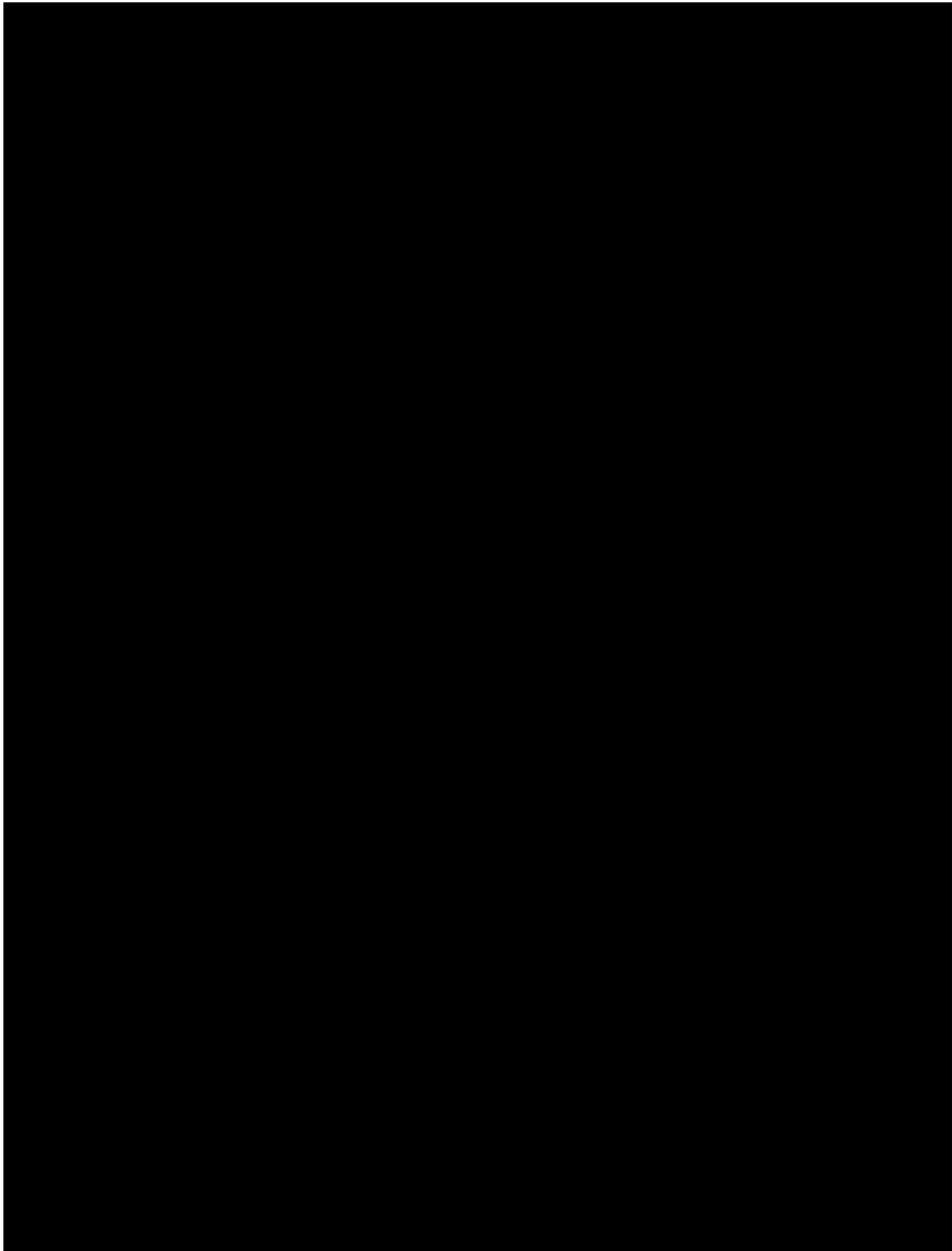
Enclosed:

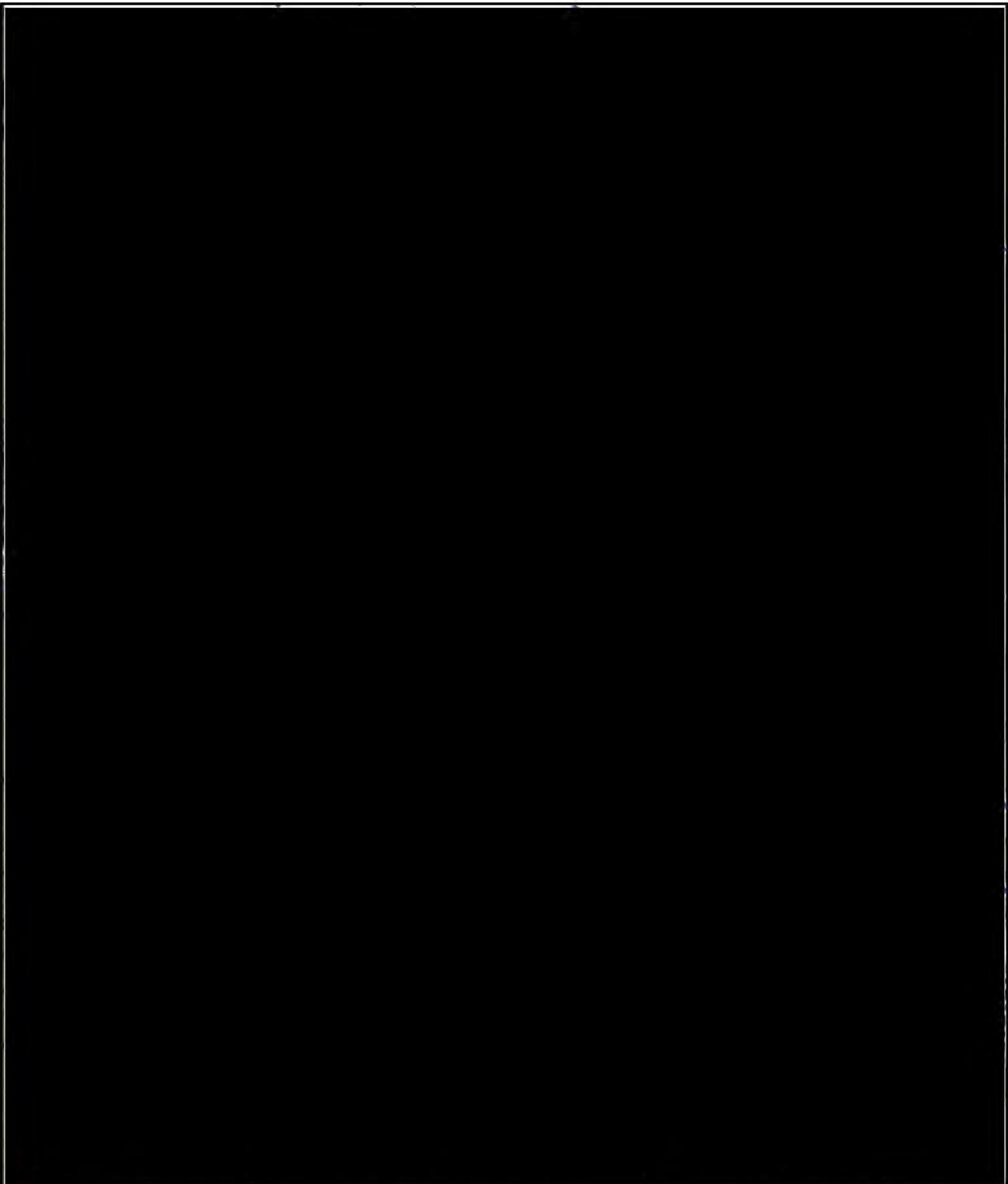
Figure 1 Topographic Map (*Contains Confidential and Privileged Information*)
Figure 2 Aerial Map (*Contains Confidential and Privileged Information*)

cc: Mark Strohfus, Great River Energy
 Andrew Levi, Merjent
 Bill Harding, Merjent

[NONPUBLIC DATA BEGINS HERE]







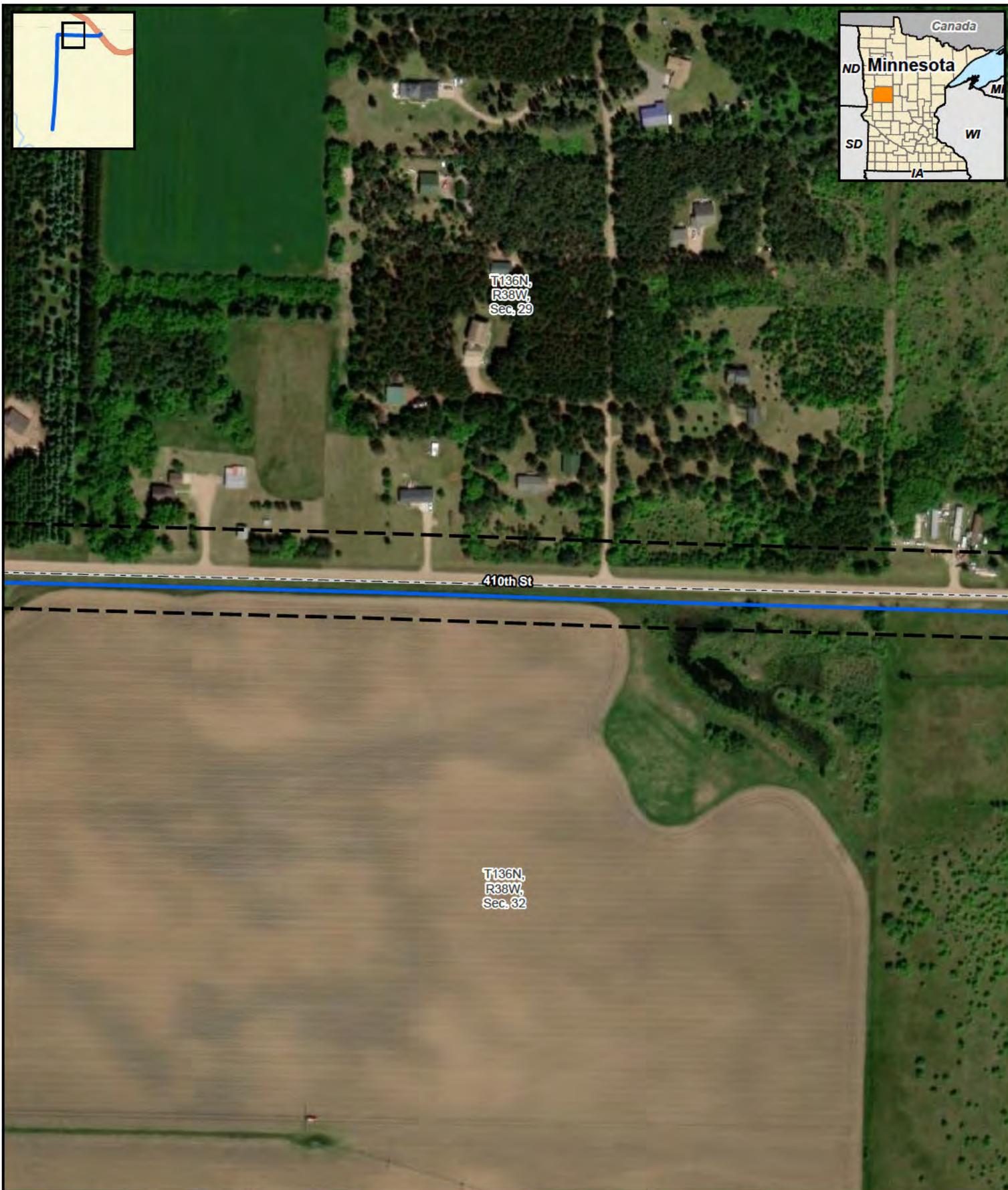
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1:3,600

For Environmental Review Purposes Only

Figure 2: Project Detail
Great River Energy
Otto Tap 115-kV Transmission Line Project
Otter Tail County, Minnesota
Page 1 of 6

-  Proposed 115-kV Transmission Line
-  Route Width
-  Great River Energy Transmission Line
-  Historic Site
-  [Redacted]
-  Section Boundary

Drawing: 19-00000001-001



T136N,
R38W,
Sec. 29

410th St

T136N,
R38W,
Sec. 32



0 150 300 Feet
1:3,600



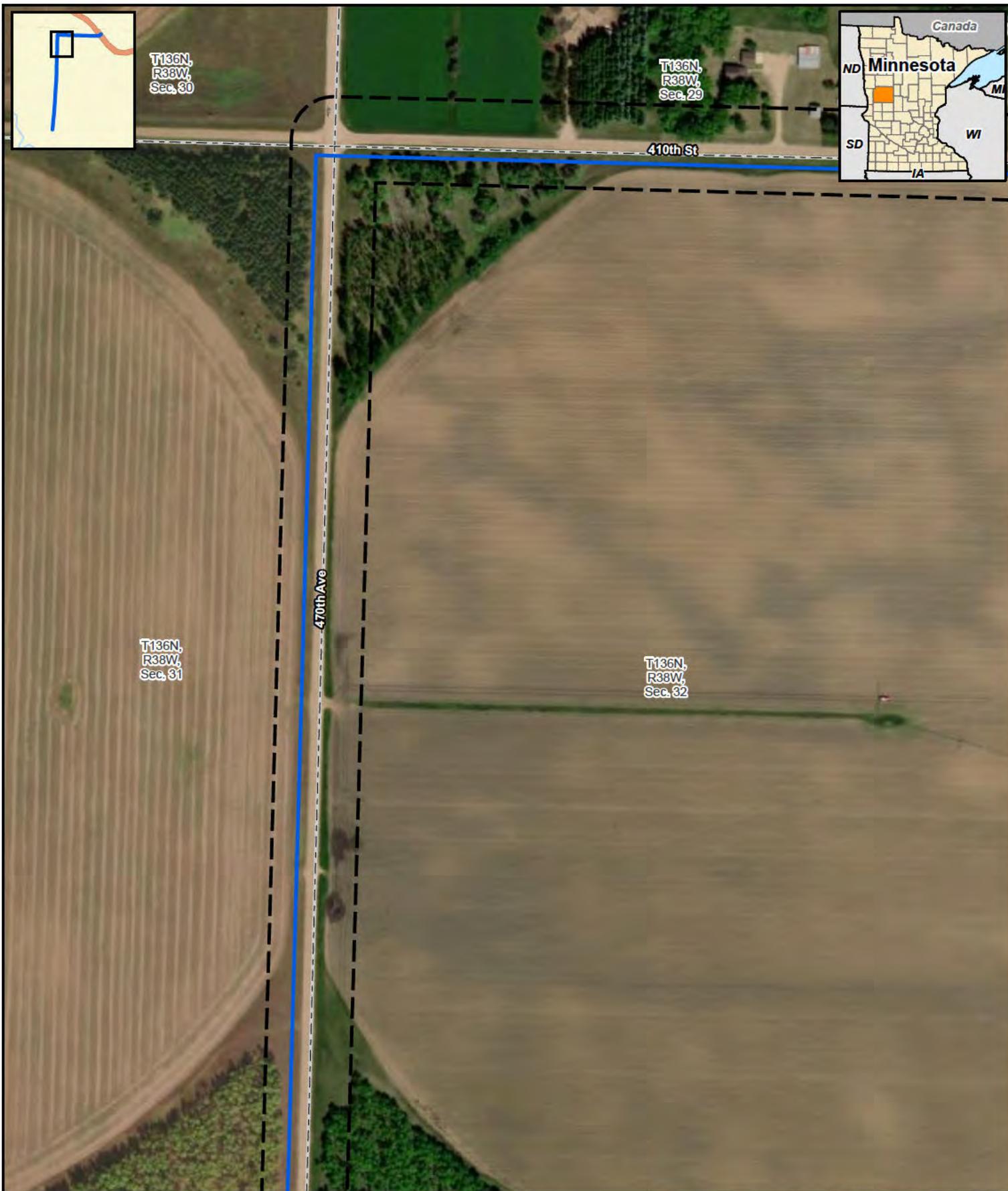
For Environmental Review Purposes Only

Figure 2: Project Detail
Great River Energy
Otto Tap 115-kV Transmission Line Project
Otter Tail County, Minnesota
Page 2 of 6

Proposed 115-kV
Transmission Line

Route Width
Section Boundary

Source: (02/20/2025)



0 150 300 Feet

1:3,600



Figure 2: Project Detail
Great River Energy
Otto Tap 115-kV Transmission Line Project
 Otter Tail County, Minnesota
 Page 3 of 6

Proposed 115-kV
Transmission Line

Route Width
Section Boundary



merjent.

0 150 300 Feet

1:3,600

For Environmental Review Purposes Only

Figure 2: Project Detail
Great River Energy
Otto Tap 115-kV Transmission Line Project
Otter Tail County, Minnesota
Page 4 of 6

Proposed 115-kV Transmission Line

Route Width

Section Boundary

Date: 02/20/2025 Source:



0 150 300 Feet

1:3,600



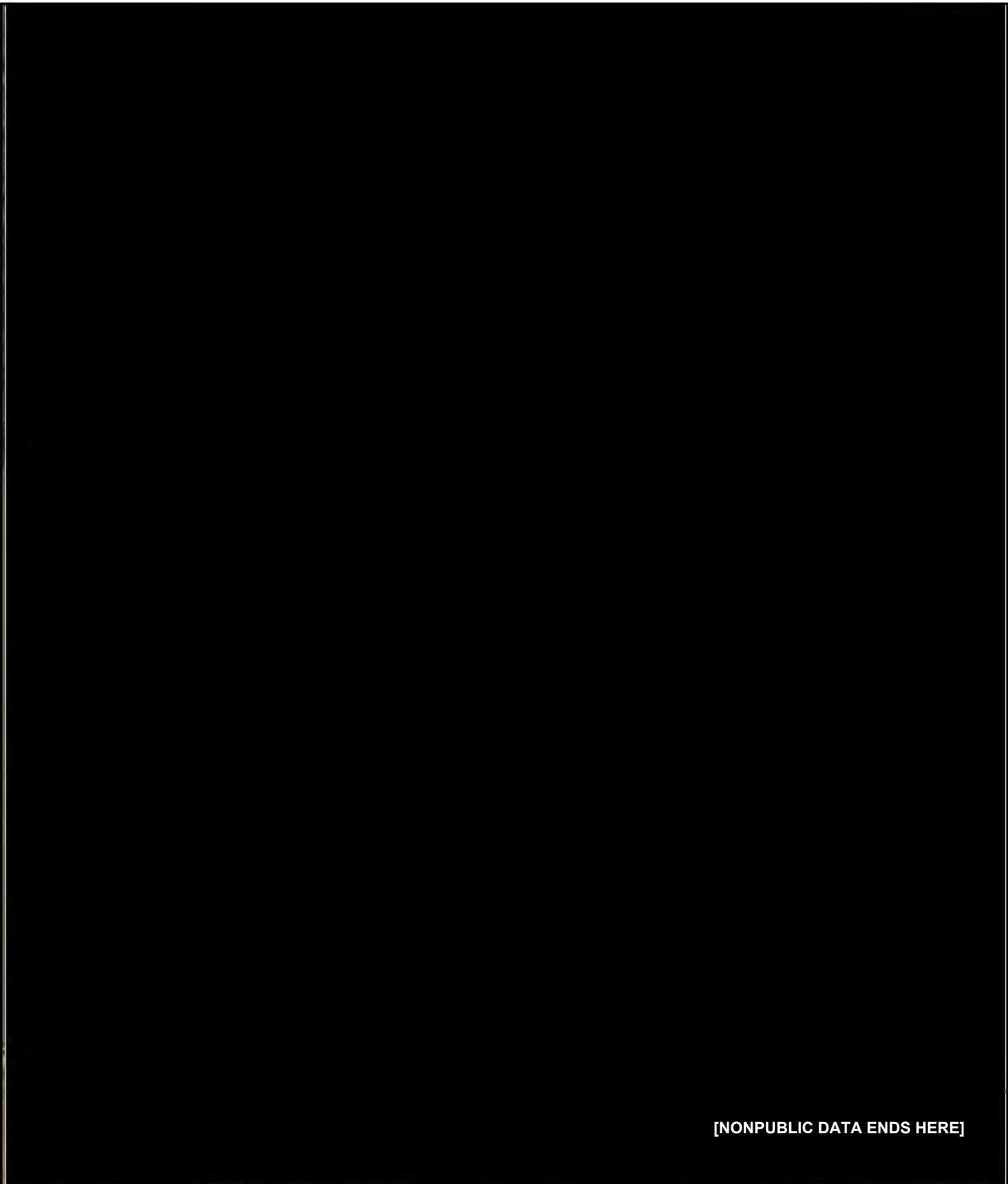
For Environmental Review Purposes Only

Figure 2: Project Detail
Great River Energy
Otto Tap 115-kV Transmission Line Project
Otter Tail County, Minnesota
Page 5 of 6

Proposed 115-kV
Transmission Line

Route Width
Section Boundary

Date: 02/20/2025 Source:



[NONPUBLIC DATA ENDS HERE]

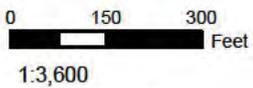


Figure 2: Project Detail
Great River Energy
Otto Tap 115-kV Transmission Line Project
Otter Tail County, Minnesota
Page 6 of 6

- Substation
- Proposed 115-kV Transmission Line
- Proposed Substation Footprint
- Route Width
- Great River Energy Transmission Line
- Foreign Transmission Line

Otter Tail County

From: [Andrew Levi](#)
To: [Colby Palmersheim](#); [Krysten Foster](#); [Kevin Fellbaum](#)
Cc: [Strohfus, Mark GRE-MG](#)
Subject: RE: EXTERNAL: RE: Great River Energy -- Otto Tap 115 kV Transmission Line Project
Date: Tuesday, May 13, 2025 12:20:00 PM
Attachments: [image001.png](#)

Colby,

Thank you for your review of the project.

Have a good day!

--Andrew

Andrew Levi

612.354.4280 direct

612-246-8581 mobile

andrew.levi@merjent.com



1 Main Street SE, Suite 300

Minneapolis, MN 55414

612.746.3660 main

www.merjent.com

From: Colby Palmersheim <cpalmersheim@ottertailcounty.gov>
Sent: Tuesday, May 13, 2025 10:55 AM
To: Krysten Foster <kfoster@ottertailcounty.gov>; Andrew Levi <andrew.levi@merjent.com>;
Strohfus, Mark GRE-MG <MStrohfu@GREnergy.com>
Cc: Kevin Fellbaum <kfellbaum@ottertailcounty.gov>
Subject: EXTERNAL: RE: Great River Energy -- Otto Tap 115 kV Transmission Line Project

CAUTION: This email originated from outside of Merjent.

Thanks for keeping the ditches in mind. I see no issue with this as long as a pole is not placed within the ditch itself.

Colby Palmersheim

Asset Management Supervisor

From: Krysten Foster <kfoster@ottertailcounty.gov>
Sent: Monday, May 12, 2025 2:15 PM
To: andrew.levi@merjent.com; MStrohfu@GREnergy.com
Cc: Colby Palmersheim <cpalmersheim@ottertailcounty.gov>; Kevin Fellbaum

<kfellbaum@ottertailcounty.gov>

Subject: FW: Great River Energy -- Otto Tap 115 kV Transmission Line Project

Mark/Andrew, I'll refer your message to Colby Palmersheim for any questions related to County Ditch 58, which is north of 390th St.

Colby Palmersheim

Asset Management Supervisor

Highway Department

505 South Court Street, Suite 1

Fergus Falls, MN 56537

Direct: 218-998-8473 | Office: 218-998-8470

Mobile: 218-770-7481

From: Andrew Levi <andrew.levi@merjent.com>

Sent: Monday, May 12, 2025 11:14 AM

To: Nicole Hansen <nhansen@ottertailcounty.gov>; Krysten Foster <kfoster@ottertailcounty.gov>; Otter Tail County Hwy <hw@ottertailcounty.gov>; Kevin Fellbaum <kfellbaum@ottertailcounty.gov>

Cc: Strohfus, Mark GRE-MG <MStrohfus@GREnergy.com>

Subject: Great River Energy -- Otto Tap 115 kV Transmission Line Project

Some people who received this message don't often get email from andrew.levi@merjent.com. [Learn why this is important](#)

Dear Nicole Hansen, Krysten Foster and Kevin Felbaum,

Great River Energy is proposing to construct approximately 2.9 miles of new single-circuit, 115-kilovolt high voltage transmission line within Otto and Pine Lake Townships in Otter Tail County, Minnesota (the Project). As part of the Project, Great River Energy will upgrade the existing Lake Region Electric Cooperative-owned Otto Substation. More information about the Project, along with a map, is available in the attached letter and fact sheet.

Great River Energy is planning to submit a Route Permit Application to the Minnesota Public Utilities Commission in late summer of 2025. Great River Energy would appreciate any comments you might have about the Project. Please reach out to Mark Strohfus with Great River Energy at 763-445-5210 or MStrohfus@GREnergy.com with questions, written comments, or a request for a meeting.

Thank you,

Andrew Levi [on behalf of Mark Strohfus, Great River Energy]

Andrew Levi

612.354.4280 direct

612-246-8581 mobile

andrew.levi@merjent.com



1 Main Street SE, Suite 300

Minneapolis, MN 55414

612.746.3660 main

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From: [Strohfus, Mark GRE-MG](#)
To: [Colby Palmersheim](#); [Krysten Foster](#); [Andrew Levi](#)
Cc: [Kevin Fellbaum](#)
Subject: EXTERNAL: RE: Great River Energy -- Otto Tap 115 kV Transmission Line Project [Otter Tail County Roads]
Date: Tuesday, May 13, 2025 1:10:40 PM
Attachments: [image001.png](#)

CAUTION: This email originated from outside of Merjent.

Hi Colby,

We typically place our structures outside of road ROW, so we shouldn't have any in the ditch.

Does the county require a work permit for any of these roads? We will also have an overhead crossing of 470th Ave.

We have already reached out to MnDOT regarding our crossing of Hwy 10.

Thanks,

Mark Strohfus
Project Manager – Transmission Permitting
Great River Energy
12300 Elm Creek Boulevard
Maple Grove, MN 55369
Direct: 763-445-5210 | Cell: 612-961-9820
www.GreatRiverEnergy.com

From: Colby Palmersheim <cpalmersheim@ottertailcounty.gov>
Sent: Tuesday, May 13, 2025 10:55 AM
To: Krysten Foster <kfoster@ottertailcounty.gov>; andrew.levi@merjent.com; Strohfus, Mark GRE-MG <MStrohfu@GREnergy.com>
Cc: Kevin Fellbaum <kfellbaum@ottertailcounty.gov>
Subject: RE: Great River Energy -- Otto Tap 115 kV Transmission Line Project

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Thanks for keeping the ditches in mind. I see no issue with this as long as a pole is not placed within the ditch itself.

Colby Palmersheim
Asset Management Supervisor

From: Krysten Foster <kfoster@ottertailcounty.gov>

Sent: Monday, May 12, 2025 2:15 PM

To: andrew.levi@merjent.com; MStrohfu@GREnergy.com

Cc: Colby Palmersheim <cpalmersheim@ottertailcounty.gov>; Kevin Fellbaum <kfellbaum@ottertailcounty.gov>

Subject: FW: Great River Energy -- Otto Tap 115 kV Transmission Line Project

Mark/Andrew, I'll refer your message to Colby Palmersheim for any questions related to County Ditch 58, which is north of 390th St.

Colby Palmersheim

Asset Management Supervisor

Highway Department

505 South Court Street, Suite 1

Fergus Falls, MN 56537

Direct: 218-998-8473 | Office: 218-998-8470

Mobile: 218-770-7481

From: Andrew Levi <andrew.levi@merjent.com>

Sent: Monday, May 12, 2025 11:14 AM

To: Nicole Hansen <nhansen@ottertailcounty.gov>; Krysten Foster <kfoster@ottertailcounty.gov>; Otter Tail County Hwy <hw@ottertailcounty.gov>; Kevin Fellbaum <kfellbaum@ottertailcounty.gov>

Cc: Strohfus, Mark GRE-MG <MStrohfu@GREnergy.com>

Subject: Great River Energy -- Otto Tap 115 kV Transmission Line Project

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Thank you,

Andrew Levi [on behalf of Mark Strohfus, Great River Energy]

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612.354.4280 direct

612-246-8581 mobile

andrew.levi@merjent.com



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Minneapolis, MN 55414

612.746.3660 main

www.merjent.com

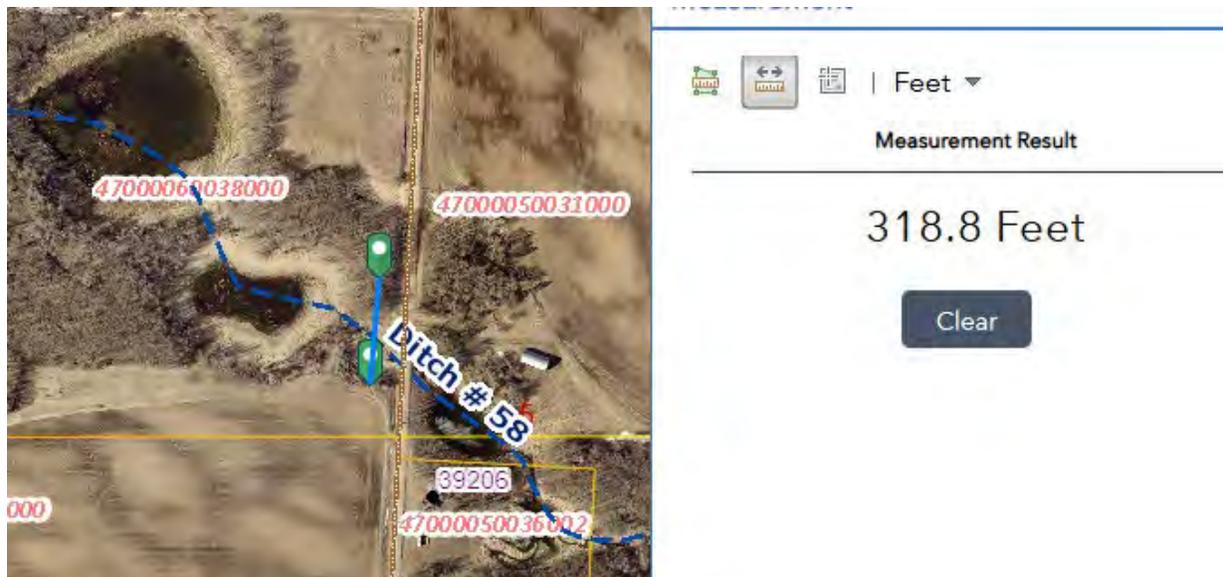
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From: [Strohfus, Mark GRE-MG](#)
To: [Colby Palmersheim](#); [Krysten Foster](#); [Andrew Levi](#)
Subject: EXTERNAL: RE: Great River Energy -- Otto Tap 115 kV Transmission Line Project [Otter Tail County Roads]
Date: Tuesday, May 13, 2025 1:25:19 PM
Attachments: [image003.png](#)
[image004.png](#)
[image005.png](#)

CAUTION: This email originated from outside of Merjent.

We typically have 300 – 500 feet spans between our structures, so we won't have any problems staying out of the ditch.



Thanks,
Mark Strohfus
Project Manager – Transmission Permitting
Great River Energy
12300 Elm Creek Boulevard
Maple Grove, MN 55369
Direct: 763-445-5210 | Cell: 612-961-9820
www.GreatRiverEnergy.com

From: Colby Palmersheim <cpalmersheim@ottertailcounty.gov>
Sent: Tuesday, May 13, 2025 1:15 PM
To: Strohfus, Mark GRE-MG <MStrohfu@GREnergy.com>; Krysten Foster <kfoster@ottertailcounty.gov>; andrew.levi@merjent.com
Subject: RE: Great River Energy -- Otto Tap 115 kV Transmission Line Project [Otter Tail County Roads]

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The ditch in reference is a drainage ditch that runs East to West, where the culvert just north of 390th street is.

There is not county permit needed as there are no county roads this will cross.



Colby Palmersheim
Asset Management Supervisor

From: Strohfus, Mark GRE-MG <MStrohfu@GREnergy.com>
Sent: Tuesday, May 13, 2025 1:11 PM
To: Colby Palmersheim <cpalmersheim@ottertailcounty.gov>; Krysten Foster <kfoster@ottertailcounty.gov>;

andrew.levi@merjent.com

Cc: Kevin Fellbaum <kfellbaum@ottertailcounty.gov>

Subject: RE: Great River Energy -- Otto Tap 115 kV Transmission Line Project [Otter Tail County Roads]

Hi Colby,

We typically place our structures outside of road ROW, so we shouldn't have any in the ditch.

Does the county require a work permit for any of these roads? We will also have an overhead crossing of 470th Ave.

We have already reached out to MnDOT regarding our crossing of Hwy 10.

Thanks,

Mark Strohfus

Project Manager – Transmission Permitting

Great River Energy

12300 Elm Creek Boulevard

Maple Grove, MN 55369

Direct: 763-445-5210 | Cell: 612-961-9820

www.GreatRiverEnergy.com

From: Colby Palmersheim <cpalmersheim@ottertailcounty.gov>

Sent: Tuesday, May 13, 2025 10:55 AM

To: Krysten Foster <kfoster@ottertailcounty.gov>; andrew.levi@merjent.com; Strohfus, Mark GRE-MG <MStrohfus@GREnergy.com>

Cc: Kevin Fellbaum <kfellbaum@ottertailcounty.gov>

Subject: RE: Great River Energy -- Otto Tap 115 kV Transmission Line Project

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Colby Palmersheim

Asset Management Supervisor

From: Krysten Foster <kfoster@ottertailcounty.gov>

Sent: Monday, May 12, 2025 2:15 PM

To: andrew.levi@merjent.com; MStrohfus@GREnergy.com

Cc: Colby Palmersheim <cpalmersheim@ottertailcounty.gov>; Kevin Fellbaum <kfellbaum@ottertailcounty.gov>

Subject: FW: Great River Energy -- Otto Tap 115 kV Transmission Line Project

Mark/Andrew, I'll refer your message to Colby Palmersheim for any questions related to County Ditch

58, which is north of 390th St.

Colby Palmersheim

Asset Management Supervisor
Highway Department
505 South Court Street, Suite 1
Fergus Falls, MN 56537
Direct: 218-998-8473 | Office: 218-998-8470
Mobile: 218-770-7481

From: Andrew Levi <andrew.levi@merjent.com>
Sent: Monday, May 12, 2025 11:14 AM
To: Nicole Hansen <nhansen@ottertailcounty.gov>; Krysten Foster <kfoster@ottertailcounty.gov>; Otter Tail County Hwy <hwy@ottertailcounty.gov>; Kevin Fellbaum <kfellbaum@ottertailcounty.gov>
Cc: Strohfus, Mark GRE-MG <MStrohfu@GREnergy.com>
Subject: Great River Energy -- Otto Tap 115 kV Transmission Line Project

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Andrew Levi [on behalf of Mark Strohfus, Great River Energy]

Andrew Levi
612.354.4280 direct
612-246-8581 mobile
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1 Main Street SE, Suite 300
Minneapolis, MN 55414
612.746.3660 main
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From: [Krysten Foster](#)
To: [Strohfus, Mark GRE-MG](#); [Andrew Levi](#)
Cc: [Gildersleeve, John \(DOT\)](#)
Subject: EXTERNAL: RE: Great River Energy -- Otto Tap 115 kV Transmission Line Project [Otter Tail County Roads]
Date: Tuesday, May 13, 2025 1:43:27 PM
Attachments: [image001.png](#)

CAUTION: This email originated from outside of Merjent.

Here are the road authority contacts for 470th Ave. (between 390th at 400th):

John Carlson, Otto Township – Clerk
Mailing Address: 47308 371ST ST
New York Mills, MN 56567
Phone: 218-298-1519
Email: carlson2426@gmail.com

And 410th St:
Susan Schmid, Pine Lake Township – Clerk
Mailing Address: 44331 MOSQUITO HTS RD
Perham, MN 56573
Phone: 218-298-0671
Email: shmidsusan54@gmail.com

I'm not sure if the townships require a right-of-way permit – Each township is different.

From: Strohfus, Mark GRE-MG <MStrohfu@GREnergy.com>
Sent: Tuesday, May 13, 2025 1:11 PM
To: Colby Palmersheim <cpalmersheim@ottertailcounty.gov>; Krysten Foster <kfoster@ottertailcounty.gov>; andrew.levi@merjent.com
Cc: Kevin Fellbaum <kfellbaum@ottertailcounty.gov>
Subject: RE: Great River Energy -- Otto Tap 115 kV Transmission Line Project [Otter Tail County Roads]

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Mark Strohfus
Project Manager – Transmission Permitting
Great River Energy
12300 Elm Creek Boulevard
Maple Grove, MN 55369
Direct: 763-445-5210 | Cell: 612-961-9820
www.GreatRiverEnergy.com

From: Colby Palmersheim <cpalmersheim@ottertailcounty.gov>
Sent: Tuesday, May 13, 2025 10:55 AM
To: Krysten Foster <kfoster@ottertailcounty.gov>; andrew.levi@merjent.com; Strohfus, Mark GRE-MG <MStrohfu@GREnergy.com>
Cc: Kevin Fellbaum <kfellbaum@ottertailcounty.gov>
Subject: RE: Great River Energy -- Otto Tap 115 kV Transmission Line Project

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Thanks for keeping the ditches in mind. I see no issue with this as long as a pole is not placed within the ditch itself.

Colby Palmersheim
Asset Management Supervisor

From: Krysten Foster <kfoster@ottertailcounty.gov>
Sent: Monday, May 12, 2025 2:15 PM
To: andrew.levi@merjent.com; MStrohfu@GREnergy.com
Cc: Colby Palmersheim <cpalmersheim@ottertailcounty.gov>; Kevin Fellbaum <kfellbaum@ottertailcounty.gov>
Subject: FW: Great River Energy -- Otto Tap 115 kV Transmission Line Project

Mark/Andrew, I'll refer your message to Colby Palmersheim for any questions related to County Ditch 58, which is north of 390th St.

Colby Palmersheim
Asset Management Supervisor
Highway Department
505 South Court Street, Suite 1
Fergus Falls, MN 56537
Direct: 218-998-8473 | Office: 218-998-8470
Mobile: 218-770-7481

From: Andrew Levi <andrew.levi@merjent.com>
Sent: Monday, May 12, 2025 11:14 AM
To: Nicole Hansen <nhansen@ottertailcounty.gov>; Krysten Foster <kfoster@ottertailcounty.gov>; Otter Tail County Hwy <hwy@ottertailcounty.gov>; Kevin Fellbaum <kfellbaum@ottertailcounty.gov>
Cc: Strohfus, Mark GRE-MG <MStrohfu@GREnergy.com>
Subject: Great River Energy -- Otto Tap 115 kV Transmission Line Project

Some people who received this message don't often get email from andrew.levi@merjent.com. [Learn why this is important](#)

Dear Nicole Hansen, Krysten Foster and Kevin Felbaum,

Great River Energy is proposing to construct approximately 2.9 miles of new single-circuit, 115-kilovolt high voltage transmission line within Otto and Pine Lake Townships in Otter Tail County, Minnesota (the Project). As part of the Project, Great River Energy will upgrade the existing Lake Region Electric Cooperative-owned Otto Substation. More information about the Project, along with a map, is available in the attached letter and fact sheet.

Great River Energy is planning to submit a Route Permit Application to the Minnesota Public Utilities Commission in late summer of 2025. Great River Energy would appreciate any comments you might have about the Project. Please reach out to Mark Strohfus with Great River Energy at 763-445-5210 or MStrohfu@GREnergy.com with questions, written comments, or a request for a meeting.

Thank you,

Andrew Levi [on behalf of Mark Strohfus, Great River Energy]

Andrew Levi
612.354.4280 direct
612-246-8581 mobile
andrew.levi@merjent.com



1 Main Street SE, Suite 300
Minneapolis, MN 55414
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From: [Colby Palmersheim](#)
To: [Strohfus, Mark GRE-MG](#); [Krysten Foster](#); [Andrew Levi](#)
Subject: EXTERNAL: RE: Great River Energy -- Otto Tap 115 kV Transmission Line Project [Otter Tail County Roads]
Date: Tuesday, May 13, 2025 1:53:48 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

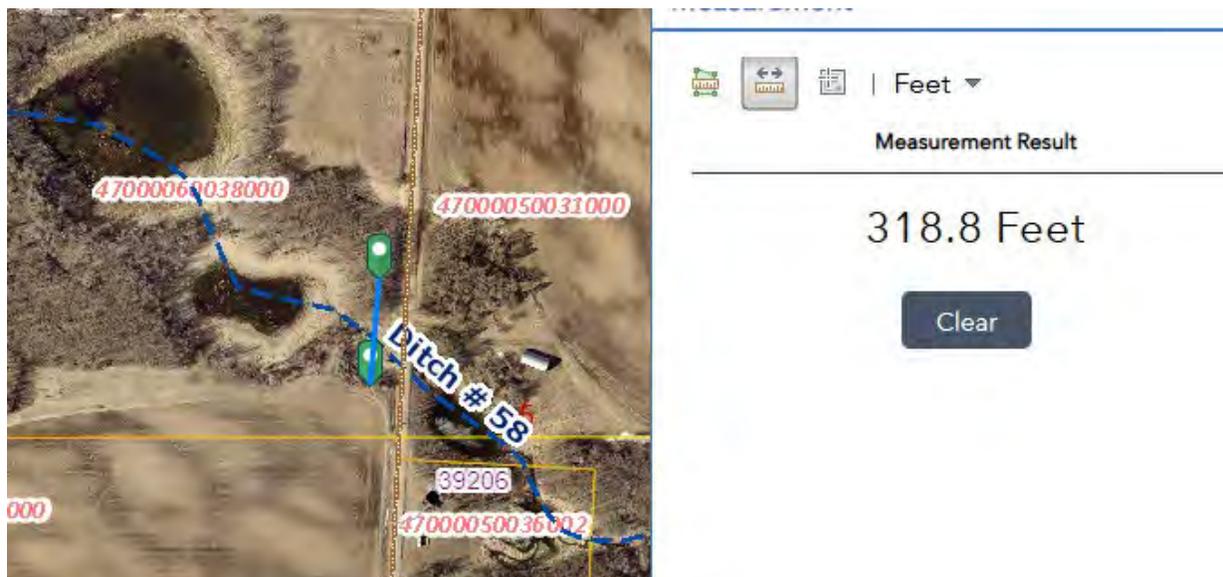
CAUTION: This email originated from outside of Merjent.

Sounds good. I think you're good to go on the County side.

Colby Palmersheim
Asset Management Supervisor

From: Strohfus, Mark GRE-MG <MStrohfu@GREnergy.com>
Sent: Tuesday, May 13, 2025 1:25 PM
To: Colby Palmersheim <cpalmersheim@ottertailcounty.gov>; Krysten Foster <kfoster@ottertailcounty.gov>; andrew.levi@merjent.com
Subject: RE: Great River Energy -- Otto Tap 115 kV Transmission Line Project [Otter Tail County Roads]

We typically have 300 – 500 feet spans between our structures, so we won't have any problems staying out of the ditch.



Thanks,
Mark Strohfus
Project Manager – Transmission Permitting
Great River Energy
12300 Elm Creek Boulevard
Maple Grove, MN 55369
Direct: 763-445-5210 | Cell: 612-961-9820
www.GreatRiverEnergy.com

From: Colby Palmersheim <cpalmersheim@ottertailcounty.gov>

Sent: Tuesday, May 13, 2025 1:15 PM

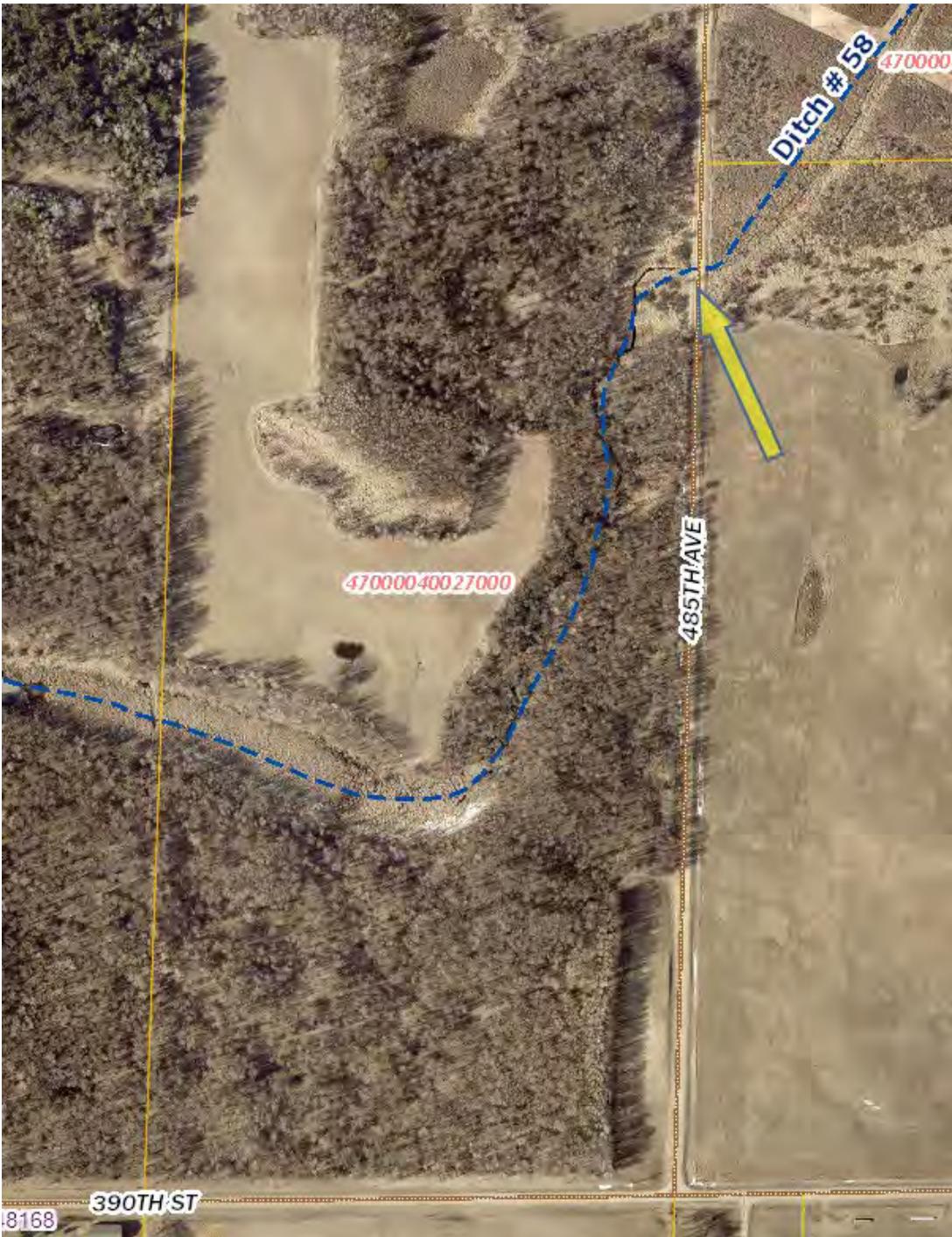
To: Strohfus, Mark GRE-MG <MStrohfu@GREnergy.com>; Krysten Foster <kfoster@ottertailcounty.gov>; andrew.levi@merjent.com

Subject: RE: Great River Energy -- Otto Tap 115 kV Transmission Line Project [Otter Tail County Roads]

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The ditch in reference is a drainage ditch that runs East to West, where the culvert just north of 390th street is.

There is not county permit needed as there are no county roads this will cross.



Colby Palmersheim
Asset Management Supervisor

From: Strohfus, Mark GRE-MG <MStrohfu@GREnergy.com>
Sent: Tuesday, May 13, 2025 1:11 PM
To: Colby Palmersheim <cpalmersheim@ottertailcounty.gov>; Krysten Foster <kfoster@ottertailcounty.gov>;
andrew.levi@merjent.com
Cc: Kevin Fellbaum <kfellbaum@ottertailcounty.gov>

Subject: RE: Great River Energy -- Otto Tap 115 kV Transmission Line Project [Otter Tail County Roads]

Hi Colby,

We typically place our structures outside of road ROW, so we shouldn't have any in the ditch.

Does the county require a work permit for any of these roads? We will also have an overhead crossing of 470th Ave.

We have already reached out to MnDOT regarding our crossing of Hwy 10.

Thanks,

Mark Strohfus
Project Manager – Transmission Permitting

Great River Energy
12300 Elm Creek Boulevard
Maple Grove, MN 55369
Direct: 763-445-5210 | Cell: 612-961-9820

www.GreatRiverEnergy.com

From: Colby Palmersheim <cpalmersheim@ottertailcounty.gov>

Sent: Tuesday, May 13, 2025 10:55 AM

To: Krysten Foster <kfoster@ottertailcounty.gov>; andrew.levi@merjent.com; Strohfus, Mark GRE-MG <MStrohfu@GREnergy.com>

Cc: Kevin Fellbaum <kfellbaum@ottertailcounty.gov>

Subject: RE: Great River Energy -- Otto Tap 115 kV Transmission Line Project

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Colby Palmersheim

Asset Management Supervisor

From: Krysten Foster <kfoster@ottertailcounty.gov>

Sent: Monday, May 12, 2025 2:15 PM

To: andrew.levi@merjent.com; MStrohfu@GREnergy.com

Cc: Colby Palmersheim <cpalmersheim@ottertailcounty.gov>; Kevin Fellbaum <kfellbaum@ottertailcounty.gov>

Subject: FW: Great River Energy -- Otto Tap 115 kV Transmission Line Project

Mark/Andrew, I'll refer your message to Colby Palmersheim for any questions related to County Ditch 58, which is north of 390th St.

Colby Palmersheim

Asset Management Supervisor
Highway Department
505 South Court Street, Suite 1
Fergus Falls, MN 56537
Direct: 218-998-8473 | Office: 218-998-8470
Mobile: 218-770-7481

From: Andrew Levi <andrew.levi@merjent.com>

Sent: Monday, May 12, 2025 11:14 AM

To: Nicole Hansen <nhansen@ottertailcounty.gov>; Krysten Foster <kfoster@ottertailcounty.gov>; Otter Tail County Hwy <hwy@ottertailcounty.gov>; Kevin Fellbaum <kfellbaum@ottertailcounty.gov>

Cc: Strohfus, Mark GRE-MG <MStrohfus@GREnergy.com>

Subject: Great River Energy -- Otto Tap 115 kV Transmission Line Project

Some people who received this message don't often get email from andrew.levi@merjent.com. [Learn why this is important](#)

Dear Nicole Hansen, Krysten Foster and Kevin Felbaum,

Great River Energy is proposing to construct approximately 2.9 miles of new single-circuit, 115-kilovolt high voltage transmission line within Otto and Pine Lake Townships in Otter Tail County, Minnesota (the Project). As part of the Project, Great River Energy will upgrade the existing Lake Region Electric Cooperative-owned Otto Substation. More information about the Project, along with a map, is available in the attached letter and fact sheet.

Great River Energy is planning to submit a Route Permit Application to the Minnesota Public Utilities Commission in late summer of 2025. Great River Energy would appreciate any comments you might have about the Project. Please reach out to Mark Strohfus with Great River Energy at 763-445-5210 or MStrohfus@GREnergy.com with questions, written comments, or a request for a meeting.

Thank you,

Andrew Levi [on behalf of Mark Strohfus, Great River Energy]

Andrew Levi

612.354.4280 direct
612-246-8581 mobile
andrew.levi@merjent.com



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Otter Tail County
Wetland Conservation Act

From: [Andrew Levi](#)
To: croth@ottertailcounty.gov
Cc: steve.hofstad@state.mn.us; [Strohfus, Mark GRE-MG](#)
Subject: Great River Energy -- Otto Tap 115 kV Transmission Line Project
Date: Monday, May 12, 2025 11:03:00 AM
Attachments: [image001.png](#)
[Otto Tap Transmission Line Fact Sheet.pdf](#)
[GRE OttoTap WetlandConservationAct Intro Letter Final.pdf](#)

Dear Courtney Roth,

Great River Energy is proposing to construct approximately 2.9 miles of new single-circuit, 115-kilovolt high voltage transmission line within Otto and Pine Lake Townships in Otter Tail County, Minnesota (the Project). As part of the Project, Great River Energy will upgrade the existing Lake Region Electric Cooperative-owned Otto Substation. More information about the Project, along with a map, is available in the attached letter and fact sheet.

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Thank you,

Andrew Levi [on behalf of Mark Strohfus, Great River Energy]

Andrew Levi

612.354.4280 direct

612-246-8581 mobile

andrew.levi@merjent.com



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Minneapolis, MN 55414

612.746.3660 main

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Otter Tail County Board of Commissioners

From: [Andrew Levi](#)
To: dbucholz@ottertailcounty.gov; rlahman@ottertailcounty.gov
Cc: [Strohfus, Mark GRE-MG](#)
Subject: Great River Energy -- Otto Tap 115 kV Transmission Line Project
Date: Monday, May 12, 2025 11:05:00 AM
Attachments: [image001.png](#)
[Otto Tap Transmission Line Fact Sheet.pdf](#)
[GRE_OttoTap_OtterTailCountyCommissioners_Intro_Letter_Final.pdf](#)

Dear Dan Bucholz and Robert Lahman,

Great River Energy is proposing to construct approximately 2.9 miles of new single-circuit, 115-kilovolt high voltage transmission line within Otto and Pine Lake Townships in Otter Tail County, Minnesota (the Project). As part of the Project, Great River Energy will upgrade the existing Lake Region Electric Cooperative-owned Otto Substation. More information about the Project, along with a map, is available in the attached letter and fact sheet.

Great River Energy is planning to submit a Route Permit Application to the Minnesota Public Utilities Commission in late summer of 2025. Great River Energy would appreciate any comments you might have about the Project. Please reach out to Mark Strohfus with Great River Energy at 763-445-5210 or MStrohfus@GREnergy.com with questions, written comments, or a request for a meeting.

Thank you,

Andrew Levi [on behalf of Mark Strohfus, Great River Energy]

Andrew Levi

612.354.4280 direct

612-246-8581 mobile

andrew.levi@merjent.com



1 Main Street SE, Suite 300

Minneapolis, MN 55414

612.746.3660 main

www.merjent.com

Otter Tail County Historical Society

From: [Andrew Levi](#)
To: otchs@prtcl.com
Cc: [Strohfus, Mark GRE-MG](#)
Subject: Great River Energy -- Otto Tap 115 kV Transmission Line Project
Date: Monday, May 12, 2025 11:14:00 AM
Attachments: [image001.png](#)
[Otto Tap Transmission Line Fact Sheet.pdf](#)
[GRE OttoTap HistoricalSociety Intro Letter Final.pdf](#)

Greetings,

Great River Energy is proposing to construct approximately 2.9 miles of new single-circuit, 115-kilovolt high voltage transmission line within Otto and Pine Lake Townships in Otter Tail County, Minnesota (the Project). As part of the Project, Great River Energy will upgrade the existing Lake Region Electric Cooperative-owned Otto Substation. More information about the Project, along with a map, is available in the attached letter and fact sheet.

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Thank you,

Andrew Levi [on behalf of Mark Strohfus, Great River Energy]

Andrew Levi

612.354.4280 direct

612-246-8581 mobile

andrew.levi@merjent.com



1 Main Street SE, Suite 300

Minneapolis, MN 55414

612.746.3660 main

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Otto Township

From: [Andrew Levi](#)
To: troy.salo@arvig.com; derek.geiser@arvig.com; jordan@hci-mn.com
Cc: cjsmack@arvig.net; carlson2426@gmail.com; [Strohfus, Mark GRE-MG](#)
Subject: Great River Energy -- Otto Tap 115 kV Transmission Line Project
Date: Monday, May 12, 2025 11:17:00 AM
Attachments: [image001.png](#)
[Otto Tap Transmission Line Fact Sheet.pdf](#)
[GRE OttoTap_OttoTownship_Intro_Letter_Final_cc.pdf](#)

Dear Troy Salo, Derek Geiser and Jordan Vaughan,

Great River Energy is proposing to construct approximately 2.9 miles of new single-circuit, 115-kilovolt high voltage transmission line within Otto and Pine Lake Townships in Otter Tail County, Minnesota (the Project). As part of the Project, Great River Energy will upgrade the existing Lake Region Electric Cooperative-owned Otto Substation. More information about the Project, along with a map, is available in the attached letter and fact sheet.

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Thank you,

Andrew Levi [on behalf of Mark Strohfus, Great River Energy]

Andrew Levi

612.354.4280 direct

612-246-8581 mobile

andrew.levi@merjent.com



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<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00

Postage \$0.73
Total Postage and Fees \$9.68

Sent To Kenneth Brock
Street and Apt. No., or PO Box No. 44431 Mosquito Hts Rd
City, State, ZIP+4® Perham MN 56573

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<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00

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Sent To AI Starz Pine Lake Township
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<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00

Postage \$0.73
Total Postage and Fees \$9.68

Sent To Susan Schmid
Street and Apt. No., or PO Box No. 44331 Mosquito Hts Rd
City, State, ZIP+4® Perham MN 56573

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Southwest Regional Development Commission

From: [Andrew Levi](#)
To: execdir@swrdc.org
Cc: [Strohfus, Mark GRE-MG](#)
Subject: Great River Energy Otto Tap 115 kV Transmission Line Project
Date: Thursday, September 11, 2025 2:01:00 PM
Attachments: [GRE_OttoTap_JaymeTrusty_20250910.pdf](#)
[image001.png](#)

Dear Jayme Trusty,

Great River Energy is proposing to construct approximately 2.9 miles of new single-circuit, 115- kilovolt high voltage transmission line within Otto and Pine Lake Townships in Otter Tail County, Minnesota (the Project). As part of the Project, Great River Energy will replace the existing Lake Region Electric Cooperative-owned Otto Substation. More information about the Project, along with a map, is available in the attached letter and fact sheet.

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Thank you,

Andrew Levi [on behalf of Mark Strohfus, Great River Energy]

Andrew Levi

612.354.4280 direct

612-246-8581 mobile

andrew.levi@merjent.com



1 Main Street SE, Suite 300

Minneapolis, MN 55414

612.746.3660 main

www.merjent.com

U.S. Army Corps of Engineers

From: [Andrew Levi](#)
To: tom.j.hayek@usace.army.mil
Subject: Otto Tap Project
Date: Friday, May 16, 2025 1:39:00 PM
Attachments: [image001.png](#)

Tom,

Thank you for your voicemail and your review of the proposed project. We are in the initial project planning phase of the project; therefore, Great River Energy has not finalized its plans near this wetland. We expect impacts to be minimal but have not completed a permitting review. We will, of course, keep you apprised as the project moves forward.

Have a good weekend!

--Andrew

Andrew Levi

612.354.4280 direct
612-246-8581 mobile
andrew.levi@merjent.com



1 Main Street SE, Suite 300
Minneapolis, MN 55414
612.746.3660 main
www.merjent.com

From: +1 651-290-5344 (Unverified) <+16512905344>
Sent: Wednesday, May 14, 2025 11:15 AM
To: Andrew Levi <andrew.levi@merjent.com>
Subject: EXTERNAL: Voice Mail (56 seconds)

CAUTION: This email originated from outside of Merjent.

Hi, good morning, Andrew. This is Tom Hayek with the US Army Corps of Engineers calling about a project that we were sent over on Monday, the Auto Tap 115 Covert Transmission line project, and just had a quick question. See what the project timeline was for permitting. I saw on the fact sheet that was included in the e-mail that project permitting was scheduled 2025 to fall 2026. I wanted to see if you were planning on submitting an application to the core in that time frame. So if you could give me a call back, I could be reached at 651-290-5344 or by e-mail at Tom dot J dot Hayek. Hayek at US A/C E dot army dot mail. Thank you. Have a good day.

You received a voice mail from [+1 651-290-5344](tel:+16512905344).

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From: [+1 651-290-5344 \(Unverified\)](#)
To: [Andrew Levi](#)
Subject: EXTERNAL: Voice Mail (56 seconds)
Date: Wednesday, May 14, 2025 11:15:19 AM
Attachments: [audio.mp3](#)

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Hi, good morning, Andrew. This is Tom Hayek with the US Army Corps of Engineers calling about a project that we were sent over on Monday, the Auto Tap 115 Covert Transmission line project, and just had a quick question. See what the project timeline was for permitting. I saw on the fact sheet that was included in the e-mail that project permitting was scheduled 2025 to fall 2026. I wanted to see if you were planning on submitting an application to the core in that time frame. So if you could give me a call back, I could be reached at 651-290-5344 or by e-mail at Tom dot J dot Hayek. Hayek at US A/C E dot army dot mail. Thank you. Have a good day.

You received a voice mail from [+1 651-290-5344](#).

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[Set Up Voice Mail](#)

From: [Andrew Levi](#)
To: usace_requests_mn@usace.army.mil; benjamin.g.orne@usace.army.mil
Cc: [Strohfus, Mark GRE-MG](#)
Subject: Great River Energy -- Otto Tap 115 kV Transmission Line Project
Date: Monday, May 12, 2025 11:17:00 AM
Attachments: [image001.png](#)
[Otto Tap Transmission Line Fact Sheet.pdf](#)
[GRE OttoTap USACE Intro Letter Final.pdf](#)

Dear Benjamin Orne,

Great River Energy is proposing to construct approximately 2.9 miles of new single-circuit, 115-kilovolt high voltage transmission line within Otto and Pine Lake Townships in Otter Tail County, Minnesota (the Project). As part of the Project, Great River Energy will upgrade the existing Lake Region Electric Cooperative-owned Otto Substation. More information about the Project, along with a map, is available in the attached letter and fact sheet.

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Thank you,

Andrew Levi [on behalf of Mark Strohfus, Great River Energy]

Andrew Levi

612.354.4280 direct
612-246-8581 mobile
andrew.levi@merjent.com



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Maple Grove, Minnesota 55369-4718
763-445-5000
greatriverenergy.com

May 12, 2025

Benjamin Orne
US Army Corps of Engineers
332 Minnesota St., Ste. E1500
St. Paul, MN 55101
usace_requests_mn@usace.army.mil
benjamin.g.orne@usace.army.mil

**Subject: Great River Energy
Otto Tap 115 kV Transmission Line Project in Otter Tail County, Minnesota
WO# 210575**

Dear Benjamin Orne:

Great River Energy, wholesale electric provider to Lake Region Electric Cooperative (LREC), is planning to build approximately 2.9 miles of new 115-kilovolt (kV) high voltage transmission line (HVTL) in Otto and Pine Lake Townships, in Otter Tail County, referred to as the Otto Tap 115-kV Transmission Line Project (Project). Great River Energy intends to submit a Route Permit application to the Minnesota Public Utilities Commission for the Project in August 2025. Great River Energy anticipates starting construction in Spring/Fall 2028 and energizing the Project in 2028 after the receipt of all necessary approvals and authorizations.

As shown on the enclosed Fact Sheet, the Project will consist of a new tap line from Great River Energy's existing 115-kV Perham to Rush Lake transmission line to LREC's existing Otto Substation. By upgrading the Otto Substation with a new connection to the 115-kV transmission system, this Project will enable LREC to continue to provide reliable service to its customers in the region. The new 115-kV transmission line will be constructed and owned by Great River Energy.

The Project will primarily use direct-buried single-pole wood or steel structures. Larger laminate poles with guying or steel poles on concrete foundations may be needed for angles. Typical pole heights will range from 70 to 90 feet above ground and spans between poles will generally range from 350 to 400 feet. Final design, which will occur after the Minnesota Public Utilities Commission issues a Route Permit, will determine the final span distances, as well as the need for specialty poles (for example, laminate poles or steel poles on foundations). Construction will generally occur within a 100-foot-wide right-of-way (ROW) easement that Great River Energy will obtain to construct, operate and maintain the transmission line. The 100-foot-wide ROW easement will be centered on the transmission line and reach 50 feet on either side of the pole line.

[name]

May 12, 2025

Page 2

Great River Energy would appreciate any comments that you may have on the Project. Please contact me at 763-445-5210 or MStrohfus@GREnergy.com should you need additional information.

Sincerely,

GREAT RIVER ENERGY

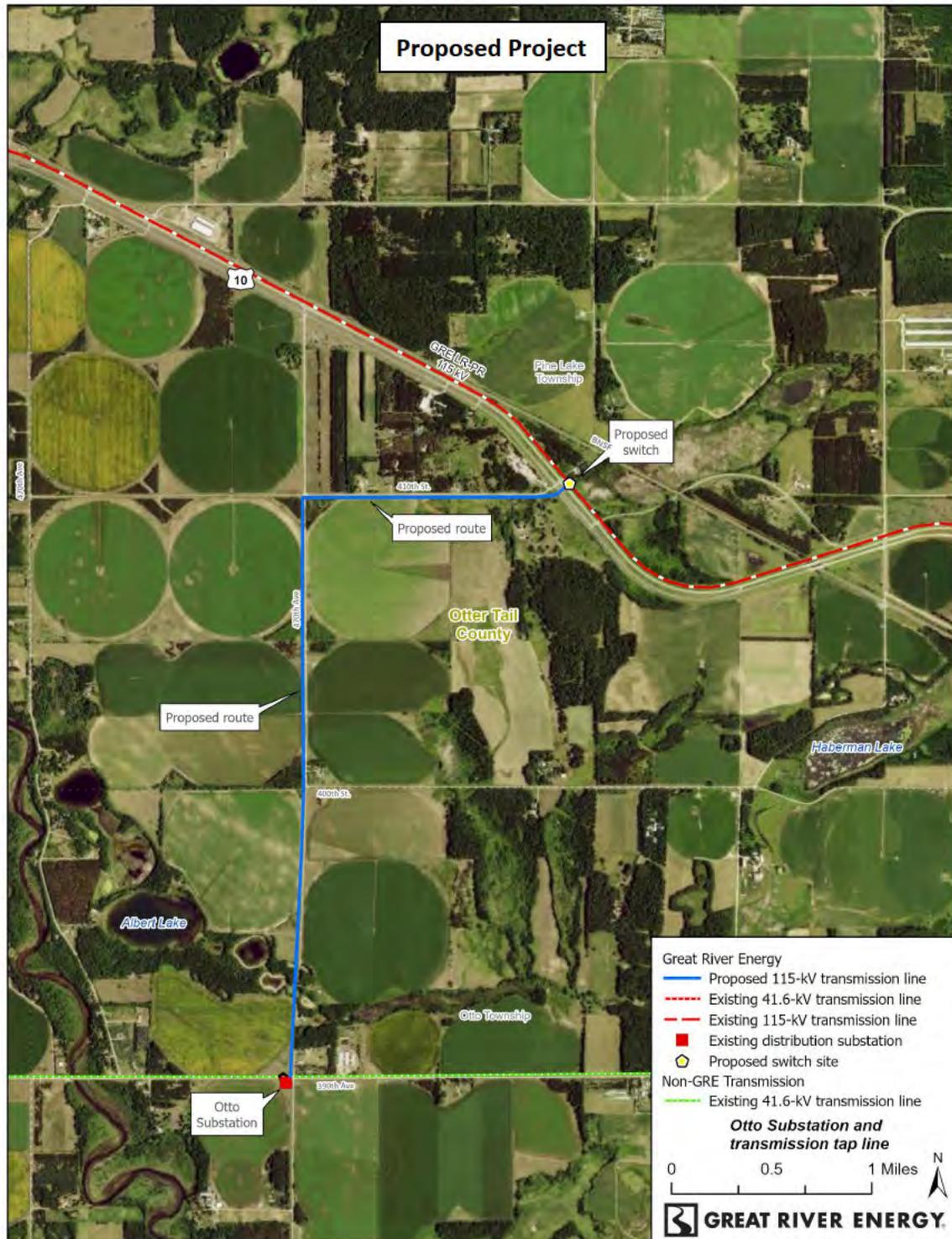


Mark Strohfus

Project Manager, Transmission Permitting

Encl: Project Fact Sheet

cc: Andrew Levi, Merjent



About Great River Energy

Great River Energy is a not-for-profit wholesale electric power cooperative which provides electricity to approximately 1.7 million people through its member-owner cooperatives and customers. Through our member-owners, we serve two-thirds of Minnesota geographically and parts of Wisconsin.

Great River Energy representatives

For project updates and information, contact:

Madalynn Brendon
 Field Representative | Land Rights
 763-445-5987 | mbrendon@greenergy.com

Mark Strohfus
 Project Manager | Permitting
 763-445-5210 | mstrohfus@greenergy.com

U.S. Department of Agriculture

From: [Andrew Levi](#)
To: "mitch.neitge@usda.gov"
Cc: [Strohfus, Mark GRE-MG](#)
Subject: Great River Energy -- Otto Tap 115 kV Transmission Line Project
Date: Monday, May 12, 2025 11:13:00 AM
Attachments: [image001.png](#)
[Otto Tap Transmission Line Fact Sheet.pdf](#)
[GRE OttoTap_NRCS_Intro_Letter_Final.pdf](#)

Dear Mitch Neitge,

Great River Energy is proposing to construct approximately 2.9 miles of new single-circuit, 115-kilovolt high voltage transmission line within Otto and Pine Lake Townships in Otter Tail County, Minnesota (the Project). As part of the Project, Great River Energy will upgrade the existing Lake Region Electric Cooperative-owned Otto Substation. More information about the Project, along with a map, is available in the attached letter and fact sheet.

Great River Energy is planning to submit a Route Permit Application to the Minnesota Public Utilities Commission in late summer of 2025. Great River Energy would appreciate any comments you might have about the Project. Please reach out to Mark Strohfus with Great River Energy at 763-445-5210 or MStrohfus@GREnergy.com with questions, written comments, or a request for a meeting.

Thank you,

Andrew Levi [on behalf of Mark Strohfus, Great River Energy]

Andrew Levi

612.354.4280 direct

612-246-8581 mobile

andrew.levi@merjent.com



1 Main Street SE, Suite 300

Minneapolis, MN 55414

612.746.3660 main

www.merjent.com

U.S. Fish and Wildlife Service

From: [Andrew Levi](#)
To: [Tawes, Robert](#)
Cc: [Strohfus, Mark GRE-MG](#)
Subject: RE: EXTERNAL: Re: [EXTERNAL] Great River Energy -- Otto Tap 115 kV Transmission Line Project
Date: Wednesday, May 14, 2025 2:08:00 PM
Attachments: [image001.png](#)
[image002.png](#)

Robert,

Good afternoon. Thank you for your review of the project. We are incorporating results from an IPaC review into the route permit application. In addition, we appreciate the recommendation for bird diverters near 470th Avenue near Albert Lake and the associated wetlands there and will reflect this recommendation in the route permit application materials. We will continue to coordinate with you as the project progresses.

Have a good day!

--Andrew

Andrew Levi

612.354.4280 direct
612-246-8581 mobile
andrew.levi@merjent.com



1 Main Street SE, Suite 300
Minneapolis, MN 55414
612.746.3660 main
www.merjent.com

From: Tawes, Robert <robert_tawes@fws.gov>
Sent: Tuesday, May 13, 2025 9:34 AM
To: Andrew Levi <andrew.levi@merjent.com>
Cc: Strohfus, Mark GRE-MG <MStrohfu@GREnergy.com>
Subject: EXTERNAL: Re: [EXTERNAL] Great River Energy -- Otto Tap 115 kV Transmission Line Project

CAUTION: This email originated from outside of Merjent.

Good morning Andrew. Thank you for the early notification. It appears the proposed line would follow existing road rights of way which minimizes habitat fragmentation. I would encourage you to visit our IPaC site <https://ipac.ecosphere.fws.gov/> where you can generate species lists and get additional technical assistance information. There may

be waterfowl and other migratory bird use of that wooded drainage area (the one with lakes near Albert Lake) on the southern end of the project, near the intersection of 470th and 390th. While current interpretation of the Migratory Bird Treaty Act is that there is no incidental take, voluntary installation of bird diverters on the line in that area could help reduce collision mortality.

	<p>IPaC: Home</p> <p>If you have a project that could potentially affect USFWS trust resources, such as migratory birds, species and critical habitat proposed or listed under the Endangered Species Act, inter-jurisdictional fishes, certain marine mammals, wetlands, coastal</p> <p>ipac.ecosphere.fws.gov</p>
---	---

Thanks for the early check in on the project. Rob

Rob Tawes | Field Supervisor
U.S. Fish and Wildlife Service
Minnesota-Wisconsin Ecological Services Field Office

3815 American Blvd. East, Bloomington, MN 55425-1665

Mobile: (651) 895-5433

Email: robert_tawes@fws.gov

Offices: **Bloomington | Green Bay | Madison**



<https://www.fws.gov/office/minnesota-wisconsin-ecological-services>

From: Andrew Levi <andrew.levi@merjent.com>
Sent: Monday, May 12, 2025 11:15 AM
To: Tawes, Robert <robert_tawes@fws.gov>
Cc: Strohfus, Mark GRE-MG <MStrohfus@GREnergy.com>
Subject: [EXTERNAL] Great River Energy -- Otto Tap 115 kV Transmission Line Project

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Robert Tawes,

Great River Energy is proposing to construct approximately 2.9 miles of new single-circuit, 115-kilovolt high voltage transmission line within Otto and Pine Lake Townships in Otter Tail County, Minnesota (the Project). As part of the Project, Great River Energy will upgrade the existing Lake Region Electric Cooperative-owned Otto Substation. More information about the Project, along with a map, is available in the attached letter and fact sheet.

Great River Energy is planning to submit a Route Permit Application to the Minnesota Public Utilities Commission in late summer of 2025. Great River Energy would appreciate any comments you might have about the Project. Please reach out to Mark Strohfus with Great River Energy at 763-445-5210 or MStrohfus@GREnergy.com with questions, written comments, or a request for a meeting.

Thank you,

Andrew Levi [on behalf of Mark Strohfus, Great River Energy]

Andrew Levi

612.354.4280 direct

612-246-8581 mobile

andrew.levi@merjent.com



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Minneapolis, MN 55414

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U.S. Fish and Wildlife Service
Information for Planning and Consultation (IPaC)



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Minnesota-Wisconsin Ecological Services Field Office
3815 American Blvd East
Bloomington, MN 55425-1659
Phone: (952) 858-0793

In Reply Refer To:
Project Code: 2025-0051732
Project Name: Otto Transmission Line

04/23/2025 19:36:50 UTC

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

This response has been generated by the Information, Planning, and Conservation (IPaC) system to provide information on natural resources that could be affected by your project. The U.S. Fish and Wildlife Service (Service) provides this response under the authority of the Endangered Species Act of 1973 (16 U.S.C. 1531-1543), the Bald and Golden Eagle Protection Act (16 U.S.C. 668-668d), the Migratory Bird Treaty Act (16 U.S.C. 703-712), and the Fish and Wildlife Coordination Act (16 U.S.C. 661 *et seq.*).

Threatened and Endangered Species

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and may be affected by your proposed project. The species list fulfills the requirement for obtaining a Technical Assistance Letter from the U.S. Fish and Wildlife Service under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

Consultation Technical Assistance

Please refer to our [Section 7 website](#) for guidance and technical assistance, including [step-by-step instructions](#) for making effects determinations for each species that might be present and for specific guidance on the following types of projects: projects in developed areas, HUD, CDBG, EDA, USDA Rural Development projects, pipelines, buried utilities, telecommunications, and requests for a Conditional Letter of Map Revision (CLOMR) from FEMA.

We recommend running the project (if it qualifies) through our **Minnesota-Wisconsin Federal Endangered Species Determination Key (Minnesota-Wisconsin ("D-key"))**. A [demonstration video](#) showing how-to access and use the determination key is available. Please note that the Minnesota-Wisconsin D-key is the third option of 3 available d-keys. D-keys are tools to help Federal agencies and other project proponents determine if their proposed action has the potential to adversely affect federally listed species and designated critical habitat. The Minnesota-Wisconsin D-key includes a structured set of questions that assists a project proponent in determining whether a proposed project qualifies for a certain predetermined consultation outcome for all federally listed species found in Minnesota and Wisconsin (except for the northern long-eared bat- see below), which includes determinations of "no effect" or "may affect, not likely to adversely affect." In each case, the Service has compiled and analyzed the best available information on the species' biology and the impacts of certain activities to support these determinations.

If your completed d-key output letter shows a "No Effect" (NE) determination for all listed species, print your IPaC output letter for your files to document your compliance with the Endangered Species Act.

For Federal projects with a "Not Likely to Adversely Affect" (NLAA) determination, our concurrence becomes valid if you do not hear otherwise from us after a 30-day review period, as indicated in your letter.

If your d-key output letter indicates additional coordination with the Minnesota-Wisconsin Ecological Services Field Office is necessary (i.e., you get a "May Affect" determination), you will be provided additional guidance on contacting the Service to continue ESA coordination outside of the key; ESA compliance cannot be concluded using the key for "May Affect" determinations unless otherwise indicated in your output letter.

Note: Once you obtain your official species list, you are not required to continue in IPaC with d-keys, although in most cases these tools should expedite your review. If you choose to make an effects determination on your own, you may do so. If the project is a Federal Action, you may want to review our section 7 step-by-step instructions before making your determinations.

Using the IPaC Official Species List to Make No Effect and May Affect Determinations for Listed Species

1. If IPaC returns a result of "There are no listed species found within the vicinity of the project," then project proponents can conclude the proposed activities will have **no effect** on any federally listed species under Service jurisdiction. Concurrence from the Service is not required for **no effect** determinations. No further consultation or coordination is required. Attach this letter to the dated IPaC species list report for your records.
2. If IPaC returns one or more federally listed, proposed, or candidate species as potentially present in the action area of the proposed project – other than bats (see below) – then project proponents must determine if proposed activities will have **no effect** on or **may affect** those species. For assistance in determining if suitable habitat for listed, candidate, or proposed species occurs within your project area or if species may be affected by project activities, you can obtain [Life History Information for Listed and Candidate Species](#) on our office website. If no impacts will occur to a species on the IPaC species list (e.g., there is no habitat present in the project area), the appropriate determination is **no effect**. No further consultation or coordination is required. Attach this letter to the dated IPaC species list report for your records.

3. Should you determine that project activities **may affect** any federally listed, please contact our office for further coordination. Letters with requests for consultation or correspondence about your project should include the Consultation Tracking Number in the header. Electronic submission is preferred.

Northern Long-Eared Bats

Northern long-eared bats occur throughout Minnesota and Wisconsin and the information below may help in determining if your project may affect these species.

Suitable summer habitat for northern long-eared bats consists of a wide variety of forested/wooded habitats where they roost, forage, and travel and may also include some adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, old fields and pastures. This includes forests and woodlots containing potential roosts (i.e., live trees and/or snags ≥ 3 inches dbh for northern long-eared bat that have exfoliating bark, cracks, crevices, and/or hollows), as well as linear features such as fencerows, riparian forests, and other wooded corridors. These wooded areas may be dense or loose aggregates of trees with variable amounts of canopy closure. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet (305 meters) of forested/wooded habitat. Northern long-eared bats have also been observed roosting in human-made structures, such as buildings, barns, bridges, and bat houses; therefore, these structures should also be considered potential summer habitat and evaluated for use by bats. If your project will impact caves or mines or will involve clearing forest or woodland habitat containing suitable roosting habitat, northern long-eared bats could be affected. For bat activity dates, please review Appendix L in the [Range-wide Indiana Bat and Northern Long-Eared Bat Survey Guidelines](#).

Examples of unsuitable habitat include:

- Individual trees that are greater than 1,000 feet from forested or wooded areas,
- Trees found in highly developed urban areas (e.g., street trees, downtown areas),
- A pure stand of less than 3-inch dbh trees that are not mixed with larger trees, and
- A monoculture stand of shrubby vegetation with no potential roost trees.

If IPaC returns a result that northern long-eared bats are potentially present in the action area of the proposed project, project proponents can conclude the proposed activities **may affect** this species **IF** one or more of the following activities are proposed:

- Clearing or disturbing suitable roosting habitat, as defined above, at any time of year,
- Any activity in or near the entrance to a cave or mine,
- Mining, deep excavation, or underground work within 0.25 miles of a cave or mine,
- Construction of one or more wind turbines, or
- Demolition or reconstruction of human-made structures that are known to be used by bats based on observations of roosting bats, bats emerging at dusk, or guano deposits or stains.

If none of the above activities are proposed, project proponents can conclude the proposed activities will have **no effect** on the northern long-eared bat. Concurrence from the Service is not required for **No Effect** determinations. No further consultation or coordination is required. Attach this letter to the dated IPaC

species list report for your records.

If any of the above activities are proposed, and the northern long-eared bat appears on the user's species list, the federal project user will be directed to either the northern long-eared bat and tricolored bat range-wide D-key or the Federal Highways Administration, Federal Railways Administration, and Federal Transit Administration Indiana bat/Northern long-eared bat D-key, depending on the type of project and federal agency involvement. Similar to the Minnesota-Wisconsin D-key, these d-keys help to determine if prohibited take might occur and, if not, will generate an automated verification letter. Additional information about available tools can be found on the Service's [northern long-eared bat website](#).

Whooping Crane

Whooping crane is designated as a non-essential experimental population in Wisconsin and consultation under Section 7(a)(2) of the Endangered Species Act is only required if project activities will occur within a National Wildlife Refuge or National Park. If project activities are proposed on lands outside of a National Wildlife Refuge or National Park, then you are not required to consult. For additional information on this designation and consultation requirements, please review "[Establishment of a Nonessential Experimental Population of Whooping Cranes in the Eastern United States](#)."

Other Trust Resources and Activities

Bald and Golden Eagles - Although the bald eagle has been removed from the endangered species list, this species and the golden eagle are protected by the Bald and Golden Eagle Act and the Migratory Bird Treaty Act. It is the responsibility of the project proponent to survey the area for any migratory bird nests. If there is an eagle nest on-site while work is on-going, eagles may be disturbed. We recommend avoiding and minimizing disturbance to eagles whenever practicable. If you cannot avoid eagle disturbance, you may seek a [permit](#). A [nest take permit](#) is always required for removal, relocation, or obstruction of an eagle nest. For communication and wind energy projects, please refer to additional guidelines below.

Migratory Birds - The Migratory Bird Treaty Act (MBTA) prohibits the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests, except when specifically authorized by the Service. The Service has the responsibility under the MBTA to proactively prevent the mortality of migratory birds whenever possible and we encourage implementation of [recommendations that minimize potential impacts to migratory birds](#). Such measures include clearing forested habitat outside the nesting season (generally March 1 to August 31) or conducting nest surveys prior to clearing to avoid injury to eggs or nestlings.

Communication Towers - Construction of new communications towers (including radio, television, cellular, and microwave) creates a potentially significant impact on migratory birds, especially some 350 species of night-migrating birds. However, the Service has developed [voluntary guidelines for minimizing impacts](#).

Transmission Lines - Migratory birds, especially large species with long wingspans, heavy bodies, and poor maneuverability can also collide with power lines. In addition, mortality can occur when birds, particularly hawks, eagles, kites, falcons, and owls, attempt to perch on uninsulated or unguarded power poles. To minimize these risks, please refer to [guidelines](#) developed by the Avian Power Line Interaction Committee and the Service. Implementation of these measures is especially important along sections of lines adjacent to wetlands or other areas that support large numbers of raptors and migratory birds.

Wind Energy - To minimize impacts to migratory birds and bats, wind energy projects should follow the Service's [Wind Energy Guidelines](#). In addition, please refer to the Service's [Eagle Conservation Plan Guidance](#), which provides guidance for conserving bald and golden eagles in the course of siting, constructing, and operating wind energy facilities.

State Department of Natural Resources Coordination

While it is not required for your Federal section 7 consultation, please note that additional state endangered or threatened species may also have the potential to be impacted. **Please contact the Minnesota or Wisconsin Department of Natural Resources for information on state listed species that may be present in your proposed project area.**

Minnesota

[Minnesota Department of Natural Resources - Endangered Resources Review Homepage](#)

Email: Review.NHIS@state.mn.us

Wisconsin

[Wisconsin Department of Natural Resources - Endangered Resources Review Homepage](#)

Email: DNRERReview@wi.gov

We appreciate your concern for threatened and endangered species. Please feel free to contact our office with questions or for additional information.

Attachment(s):

- Official Species List
- USFWS National Wildlife Refuges and Fish Hatcheries
- Bald & Golden Eagles
- Migratory Birds
- Wetlands

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Minnesota-Wisconsin Ecological Services Field Office

3815 American Blvd East

Bloomington, MN 55425-1659

(952) 858-0793

PROJECT SUMMARY

Project Code: 2025-0051732

Project Name: Otto Transmission Line

Project Type: Distribution Line - New Construction - Above Ground

Project Description: Transmission Line

Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@46.5464866,-95.51275349444768,14z>



Counties: Otter Tail County, Minnesota

ENDANGERED SPECIES ACT SPECIES

There is a total of 4 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

-
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

MAMMALS

NAME	STATUS
Gray Wolf <i>Canis lupus</i> Population: MN There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/4488	Threatened

INSECTS

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> There is proposed critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9743	Proposed Threatened
Suckley's Cuckoo Bumble Bee <i>Bombus suckleyi</i> Population: No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/10885	Proposed Endangered
Western Regal Fritillary <i>Argynnis idalia occidentalis</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/12017	Proposed Threatened

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

BALD & GOLDEN EAGLES

Bald and Golden Eagles are protected under the Bald and Golden Eagle Protection Act ² and the Migratory Bird Treaty Act (MBTA) ¹. Any person or organization who plans or conducts activities that may result in impacts to Bald or Golden Eagles, or their habitats, should follow

appropriate regulations and consider implementing appropriate avoidance and minimization measures, as described in the various links on this page.

1. The [Bald and Golden Eagle Protection Act](#) of 1940.
2. The [Migratory Birds Treaty Act](#) of 1918.
3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

There are Bald Eagles and/or Golden Eagles in your [project](#) area.

Measures for Proactively Minimizing Eagle Impacts

For information on how to best avoid and minimize disturbance to nesting bald eagles, please review the [National Bald Eagle Management Guidelines](#). You may employ the timing and activity-specific distance recommendations in this document when designing your project/activity to avoid and minimize eagle impacts. For bald eagle information specific to Alaska, please refer to [Bald Eagle Nesting and Sensitivity to Human Activity](#).

The FWS does not currently have guidelines for avoiding and minimizing disturbance to nesting Golden Eagles. For site-specific recommendations regarding nesting Golden Eagles, please consult with the appropriate Regional [Migratory Bird Office](#) or [Ecological Services Field Office](#).

If disturbance or take of eagles cannot be avoided, an [incidental take permit](#) may be available to authorize any take that results from, but is not the purpose of, an otherwise lawful activity. For assistance making this determination for Bald Eagles, visit the [Do I Need A Permit Tool](#). For assistance making this determination for golden eagles, please consult with the appropriate Regional [Migratory Bird Office](#) or [Ecological Services Field Office](#).

Ensure Your Eagle List is Accurate and Complete

If your project area is in a poorly surveyed area in IPaC, your list may not be complete and you may need to rely on other resources to determine what species may be present (e.g. your local FWS field office, state surveys, your own surveys). Please review the [Supplemental Information on Migratory Birds and Eagles](#), to help you properly interpret the report for your specified location, including determining if there is sufficient data to ensure your list is accurate.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to bald or golden eagles on your list, see the "Probability of Presence Summary" below to see when these bald or golden eagles are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Bald Eagle <i>Haliaeetus leucocephalus</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626	Breeds Dec 1 to Aug 31

PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "[Supplemental Information on Migratory Birds and Eagles](#)", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Green bars; the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during that week of the year.

Breeding Season (■)

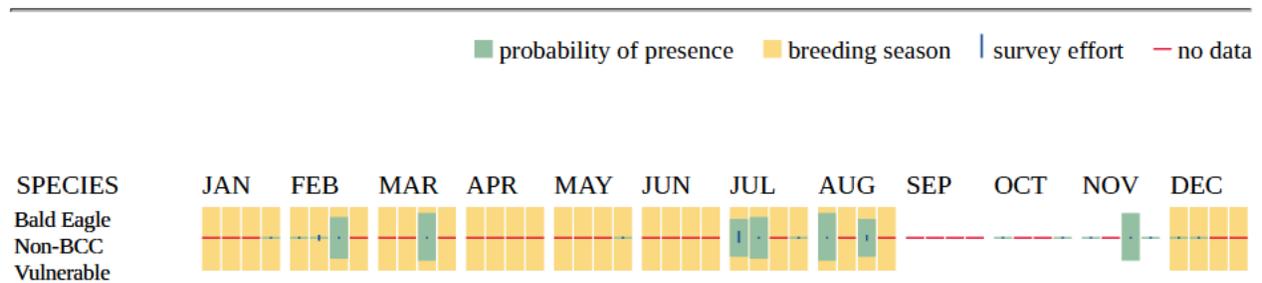
Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

Survey Effort (|)

Vertical black lines; the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data (-)

A week is marked as having no data if there were no survey events for that week.



Additional information can be found using the following links:

- Eagle Management <https://www.fws.gov/program/eagle-management>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incident-take-migratory-birds>
- Nationwide avoidance and minimization measures for birds <https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf>
- Supplemental Information for Migratory Birds and Eagles in IPaC <https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action>

MIGRATORY BIRDS

The Migratory Bird Treaty Act (MBTA) ¹ prohibits the take (including killing, capturing, selling, trading, and transport) of protected migratory bird species without prior authorization by the Department of Interior U.S. Fish and Wildlife Service (Service). The incidental take of migratory birds is the injury or death of birds that results from, but is not the purpose, of an activity. The Service interprets the MBTA to prohibit incidental take.

1. The [Migratory Birds Treaty Act](#) of 1918.
2. The [Bald and Golden Eagle Protection Act](#) of 1940.
3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, see the "Probability of Presence Summary" below to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Bald Eagle <i>Haliaeetus leucocephalus</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626	Breeds Dec 1 to Aug 31
Bobolink <i>Dolichonyx oryzivorus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9454	Breeds May 20 to Jul 31

PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "[Supplemental Information on Migratory Birds and Eagles](#)", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Green bars; the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during that week of the year.

Breeding Season (■)

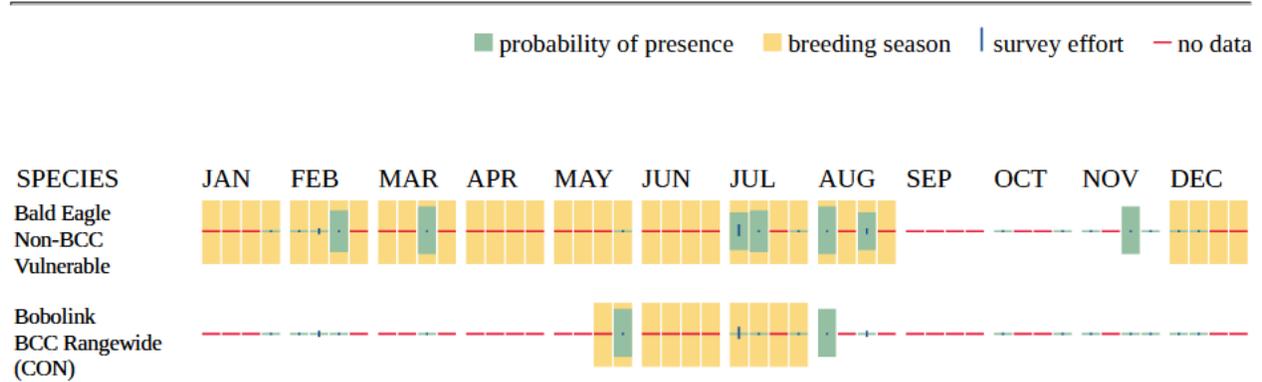
Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

Survey Effort (|)

Vertical black lines; the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data (-)

A week is marked as having no data if there were no survey events for that week.



Additional information can be found using the following links:

- Eagle Management <https://www.fws.gov/program/eagle-management>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incident-take-migratory-birds>
- Nationwide avoidance and minimization measures for birds
- Supplemental Information for Migratory Birds and Eagles in IPaC <https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action>

WETLANDS

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

FRESHWATER POND

- PUBH
- PABH

FRESHWATER EMERGENT WETLAND

- PEM1Cd
- PEM1Ad

FRESHWATER FORESTED/SHRUB WETLAND

- PFO1Ad

IPAC USER CONTACT INFORMATION

Agency: Private Entity
Name: Mandy Bohnenblust
Address: 1 Main St SE, Suite 300
City: Minneapolis
State: MN
Zip: 55414
Email: mandy.bohnenblust@merjent.com
Phone: 6127463677



United States Department of the Interior



FISH AND WILDLIFE SERVICE
 Minnesota-Wisconsin Ecological Services Field Office
 3815 American Blvd East
 Bloomington, MN 55425-1659
 Phone: (952) 858-0793

In Reply Refer To:
 Project code: 2025-0051732
 Project Name: Otto Transmission Line

05/05/2025 14:14:00 UTC

Subject: Technical Assistance letter for 'Otto Transmission Line' for specified threatened and endangered species that may occur in your proposed project location consistent with the Minnesota-Wisconsin Endangered Species Determination Key (Minnesota-Wisconsin DKey).

Dear Mandy Bohnenblust:

The U.S. Fish and Wildlife Service (Service) received on **May 05, 2025** your effect determination(s) for the 'Otto Transmission Line' (Action) using the Minnesota-Wisconsin DKey within the Information for Planning and Consultation (IPaC) system. You have submitted this key to satisfy requirements under Section 7(a)(2). The Service developed this system in accordance of with the Endangered Species Act of 1973 (ESA) (87 Stat. 884, as amended; 16 U.S.C 1531 et seq.).

Based on your answers and the assistance of the Service’s Minnesota-Wisconsin DKey, you made the following effect determination(s) for the proposed Action:

Species	Listing Status	Determination
Gray Wolf (<i>Canis lupus</i>)	Threatened	NLAA
Monarch Butterfly (<i>Danaus plexippus</i>)	Proposed Threatened	No effect

Determination Information

Thank you for informing the Service of your “NLAA” determination(s). No further coordination is necessary for the species you determined may be affected, but not likely to be adversely affected, by the Action.

Additional Information

Sufficient project details: Please provide sufficient project details on your project homepage in IPaC (Define Project, Project Description) to support your conclusions. Failure to disclose important aspects of your project that would influence the outcome of your effects determinations may negate your determinations and invalidate this letter. If you have site-specific information that leads you to believe a different determination is more appropriate for your

project than what the Dkey concludes, you can and should proceed based on the best available information.

Future project changes: The Service recommends that you contact the Minnesota-Wisconsin Ecological Services Field Office or re-evaluate the project in IPaC if: 1) the scope or location of the proposed Action is changed; 2) new information reveals that the action may affect listed species or designated critical habitat in a manner or to an extent not previously considered; 3) the Action is modified in a manner that causes effects to listed species or designated critical habitat; or 4) a new species is listed or critical habitat designated. If any of the above conditions occurs, additional consultation with the Service should take place before project changes are final or resources committed.

For non-Federal representatives: Please note that when a project requires consultation under section 7 of the Act, the Service must consult directly with the Federal action agency unless that agency formally designates a non-Federal representative (50 CFR 402.08). Non-Federal representatives may prepare analyses or conduct informal consultations; however, the ultimate responsibility for section 7 compliance under the Act remains with the Federal agency. Please include the Federal action agency in additional correspondence regarding this project.

Species-specific information

Gray Wolf: Please notify the Service if there is observed gray wolf activity during project implementation that could indicate a den or rendezvous site in close proximity (e.g., multiple wolves observed).

Bald and Golden Eagles: Bald eagles, golden eagles, and their nests are protected under the Bald and Golden Eagle Protection Act (54 Stat. 250, as amended, 16 U.S.C. 668a-d) (Eagle Act). The Eagle Act prohibits, except when authorized by an Eagle Act permit, the “taking” of bald and golden eagles and defines “take” as “pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb.” The Eagle Act’s implementing regulations define disturb as “... to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, (1) injury to an eagle, (2) a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or (3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior.”

The following species and/or critical habitats may also occur in your project area and **are not** covered by this conclusion:

- Suckley's Cuckoo Bumble Bee *Bombus suckleyi* Proposed Endangered
- Western Regal Fritillary *Argynnis idalia occidentalis* Proposed Threatened

Coordination with the Service is not complete if additional coordination is advised above for any species.

Action Description

You provided to IPaC the following name and description for the subject Action.

1. Name

Otto Transmission Line

2. Description

The following description was provided for the project 'Otto Transmission Line':

Transmission Line

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@46.5464866,-95.51275349444768,14z>



QUALIFICATION INTERVIEW

1. This determination key is intended to assist the user in evaluating the effects of their actions on Federally listed species in Minnesota and Wisconsin. It does not cover other prohibited activities under the Endangered Species Act (e.g., for wildlife: import/export, Interstate or foreign commerce, possession of illegally taken wildlife, etc.; for plants: import/export, reduce to possession, malicious destruction on Federal lands, commercial sale, etc.) or other statutes. Additionally, this key DOES NOT cover wind development, purposeful take (e.g., for research or surveys), communication towers that have guy wires or are over 450 feet in height, aerial or other large-scale application of any chemical (such as insecticide or herbicide), and approval of long-term permits or plans (e.g., FERC licenses, HCP's).

Click **YES** to acknowledge that you must consider other prohibitions of the ESA or other statutes outside of this determination key.

Yes

2. Is the action being funded, authorized, or carried out by a Federal agency?

No

3. Are you the Federal agency or designated non-federal representative?

No

4. Does the action involve the installation or operation of wind turbines?

No

5. Does the action involve purposeful take of a listed animal?

No

6. Does the action involve a new communications tower?

No

7. Does the activity involve aerial or other large-scale application of ANY chemical, including pesticides (insecticide, herbicide, fungicide, rodenticide, etc.)?

No

8. Will your action permanently affect local hydrology?

No

9. Will your action temporarily affect local hydrology?

No

10. Will your project have any direct impacts to a stream or river (e.g., Horizontal Directional Drilling (HDD), hydrostatic testing, stream/road crossings, new stormwater outfall discharge, dams, other in-stream work, etc.)?

No

11. Does your project have the potential to impact the riparian zone or indirectly impact a stream/river (e.g., cut and fill; horizontal directional drilling; construction; vegetation removal; pesticide or fertilizer application; discharge; runoff of sediment or pollutants; increase in erosion, etc.)?

Note: Consider all potential effects of the action, including those that may happen later in time and outside and downstream of the immediate area involved in the action.

Endangered Species Act regulation defines "effects of the action" to include all consequences to listed species or critical habitat that are caused by the proposed action, including the consequences of other activities that are caused by the proposed action. A consequence is caused by the proposed action if it would not occur but for the proposed action and it is reasonably certain to occur. Effects of the action may occur later in time and may include consequences occurring outside the immediate area involved in the action. (50 CFR 402.02).

No

12. Will your action disturb the ground or existing vegetation?

Note: This includes any off-road vehicle access, soil compaction (enough to collapse a rodent burrow), digging, seismic survey, directional drilling, heavy equipment, grading, trenching, placement of fill, pesticide application (herbicide, fungicide), vegetation management (including removal or maintenance using equipment or prescribed fire), cultivation, development, etc.

Yes

13. Will your action include spraying insecticides?

No

14. Does your action area occur entirely within an already developed area?

Note: Already developed areas are already paved, covered by existing structures, manicured lawns, industrial sites, or cultivated cropland, AND do not contain trees that could be roosting habitat. Be aware that listed species may occur in areas with natural, or semi-natural, vegetation immediately adjacent to existing utilities (e.g. roadways, railways) or within utility rights-of-way such as overhead transmission line corridors, and can utilize suitable trees, bridges, or culverts for roosting even in urban dominated landscapes (so these are not considered "already developed areas" for the purposes of this question). If unsure, select NO..

No

15. Is there any potential for the action to harm wolves directly (e.g., mammal trapping, poison bait), or indirectly (e.g., increasing vehicle use that may result in vehicle strikes, exposure to potential human persecution)?

No

16. [Hidden Semantic] Does the action area intersect the Threatened gray wolf AOI?

Automatically answered

Yes

17. [Hidden Semantic] Does the action area intersect the monarch butterfly species list area?

Automatically answered

Yes

18. Under the ESA, monarchs remain warranted but precluded by listing actions of higher priority. The monarch is a candidate for listing at this time. The Endangered Species Act does not establish protections or consultation requirements for candidate species. Some Federal and State agencies may have policy requirements to consider candidate species in planning. We encourage implementing measures that will remove or reduce threats to these species and possibly make listing unnecessary.

If your project will have no effect on monarch butterflies (for example, if your project won't affect their habitat or individuals), then you can make a "no effect" determination for this project.

Are you making a "no effect" determination for monarch?

Yes

IPAC USER CONTACT INFORMATION

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Phone: 6127463677

West Central Initiative

From: [Andrew Levi](#)
To: wci@wci.org
Cc: [Strohfus, Mark GRE-MG](#)
Subject: Great River Energy -- Otto Tap 115 kV Transmission Line Project
Date: Monday, May 12, 2025 11:18:00 AM
Attachments: [image001.png](#)
[Otto Tap Transmission Line Fact Sheet.pdf](#)
[GRE OttoTap_WCI_Intro_Letter_Final.pdf](#)

Greetings,

Great River Energy is proposing to construct approximately 2.9 miles of new single-circuit, 115-kilovolt high voltage transmission line within Otto and Pine Lake Townships in Otter Tail County, Minnesota (the Project). As part of the Project, Great River Energy will upgrade the existing Lake Region Electric Cooperative-owned Otto Substation. More information about the Project, along with a map, is available in the attached letter and fact sheet.

Great River Energy is planning to submit a Route Permit Application to the Minnesota Public Utilities Commission in late summer of 2025. Great River Energy would appreciate any comments you might have about the Project. Please reach out to Mark Strohfus with Great River Energy at 763-445-5210 or MStrohfus@GREnergy.com with questions, written comments, or a request for a meeting.

Thank you,

Andrew Levi [on behalf of Mark Strohfus, Great River Energy]

Andrew Levi

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