



July 25, 2025

—Via Electronic Filing—

The Honorable James Mortenson
Administrative Law Judge
Minnesota Office of Administrative Hearings
P.O. Box 64620
St. Paul, MN 55164-0640

Re: Reply to EIP Staff's Comments on Applicant's Proposed Findings of Fact
*In the Matter of the Application of ITC Midwest LLC for a Route Permit
for the 161 kV Transmission Line from Forks Substation to Rost Substation
in Jackson County, Minnesota*
Docket No. ET6675/TL-24-232
OAH Docket No. 5-2500-40519

Dear Judge Mortenson,

ITC Midwest LLC (ITC Midwest or Applicant) submits for filing in the above-referenced docket its response to the Minnesota Public Utilities Commission Energy Infrastructure Permitting (EIP) Staff's comments on Applicant's proposed Findings of Fact, Conclusions of Law, and Recommendations (Findings). ITC Midwest appreciates the EIP Staff's thorough review of ITC Midwest's proposed Findings for the proposed new 161 kV transmission line from the Forks Substation to the Rost Substation in Jackson County, Minnesota (Project) and responds to the EIP Staff's comments below.

A. Maps to Visualize Route Evaluated for the Project

The EIP Staff recommended modifying Figure 1 in the Applicant's Findings to identify the Forks Switching Station and Rost Substation. EIP Staff also recommended an additional map to illustrate the locations of the Route Alternative 1, Route Alternative 2, and Route Alternative 3 that were considered, but rejected, for the Project. ITC Midwest agrees with EIP Staff and provided as Attachment A to this filing are two maps to satisfy these recommendations. The first map is a revised version of Figure 1 and the second map is labeled as Figure 2 and shows the three route alternatives that were considered but rejected.

B. Finding 171 Correction

The EIP recommended modifying Finding 171 to remove the following sentence:

171. No permanent impacts to wetlands are anticipated.¹ All wetlands will be spanned by the transmission line and no permanent impacts to wetlands will occur. ~~No permanent impacts to wetlands are not anticipated.~~² Wetland areas that may potentially be crossed for construction access that are not dry, stable, and/or frozen will be matted to reduce ground disturbance and will result in temporary impacts to vegetation.³

The Applicant supports the EIP Staff's proposed correction in Finding 171.

C. Conclusion

ITC Midwest appreciates the EIP Staff's review of its proposed Findings and respectfully requests that the Administrative Law Judge recommend, and the Commission issue, a route permit for the Project.

Please contact me at (763) 257-6821 or mrothfork@itctransco.com if you have any questions regarding this filing.

Sincerely,

Mark Rothfork

Mark Rothfork, Lead Permitting Specialist
ITC Midwest LLC
Email: mrothfork@itctransco.com

cc: Service List
Enclosures

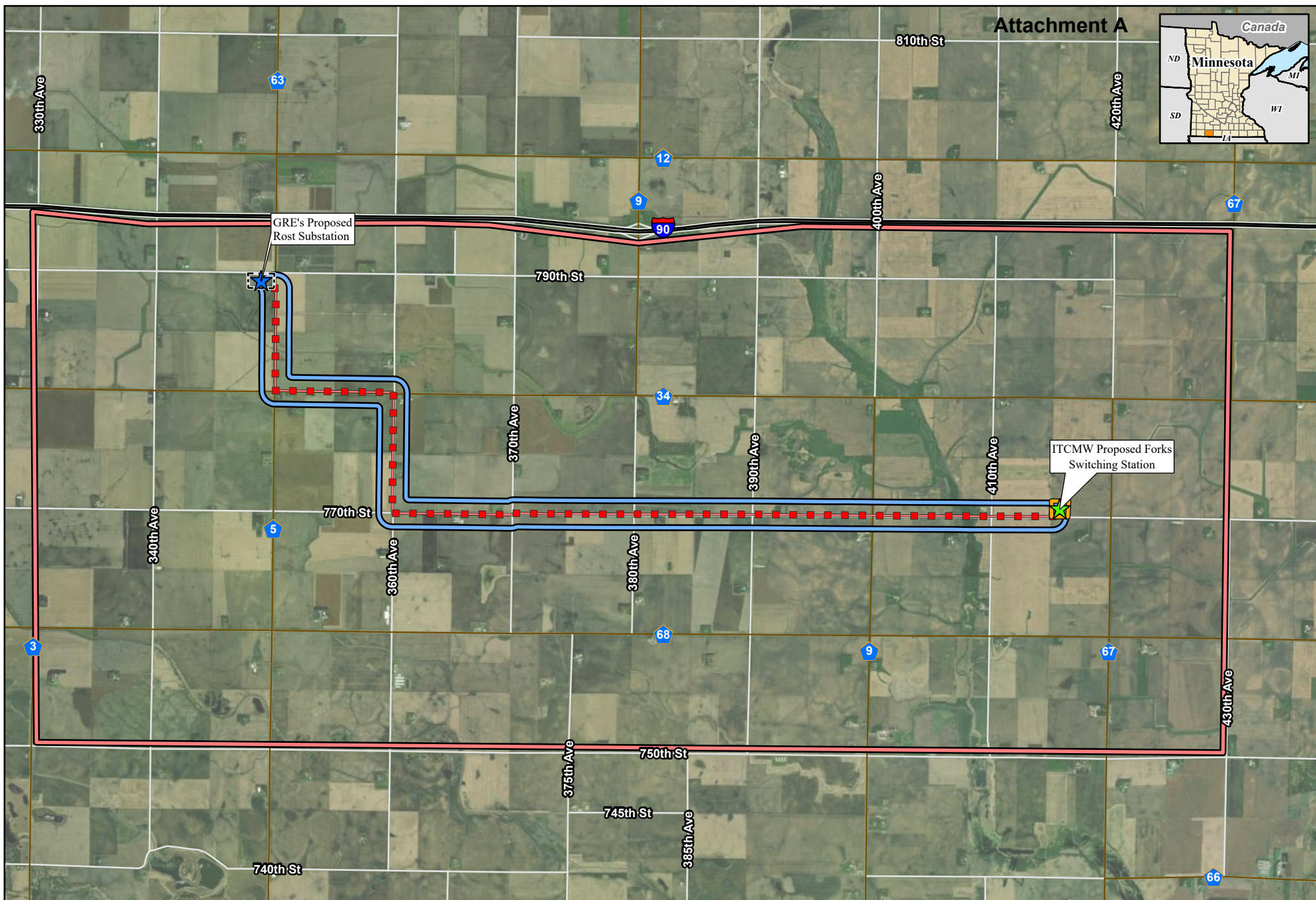


Figure 1 - Proposed Route
Forks-Rost 161 kV Project
 ITC Midwest
 Jackson County, Minnesota

- Proposed Forks Substation
- Proposed Rost Substation
- Proposed Route
- Proposed Route (width = 1,500 feet)
- Study Area
- ITCMW Proposed Forks Switching Station
- GRE's Proposed Rost Substation

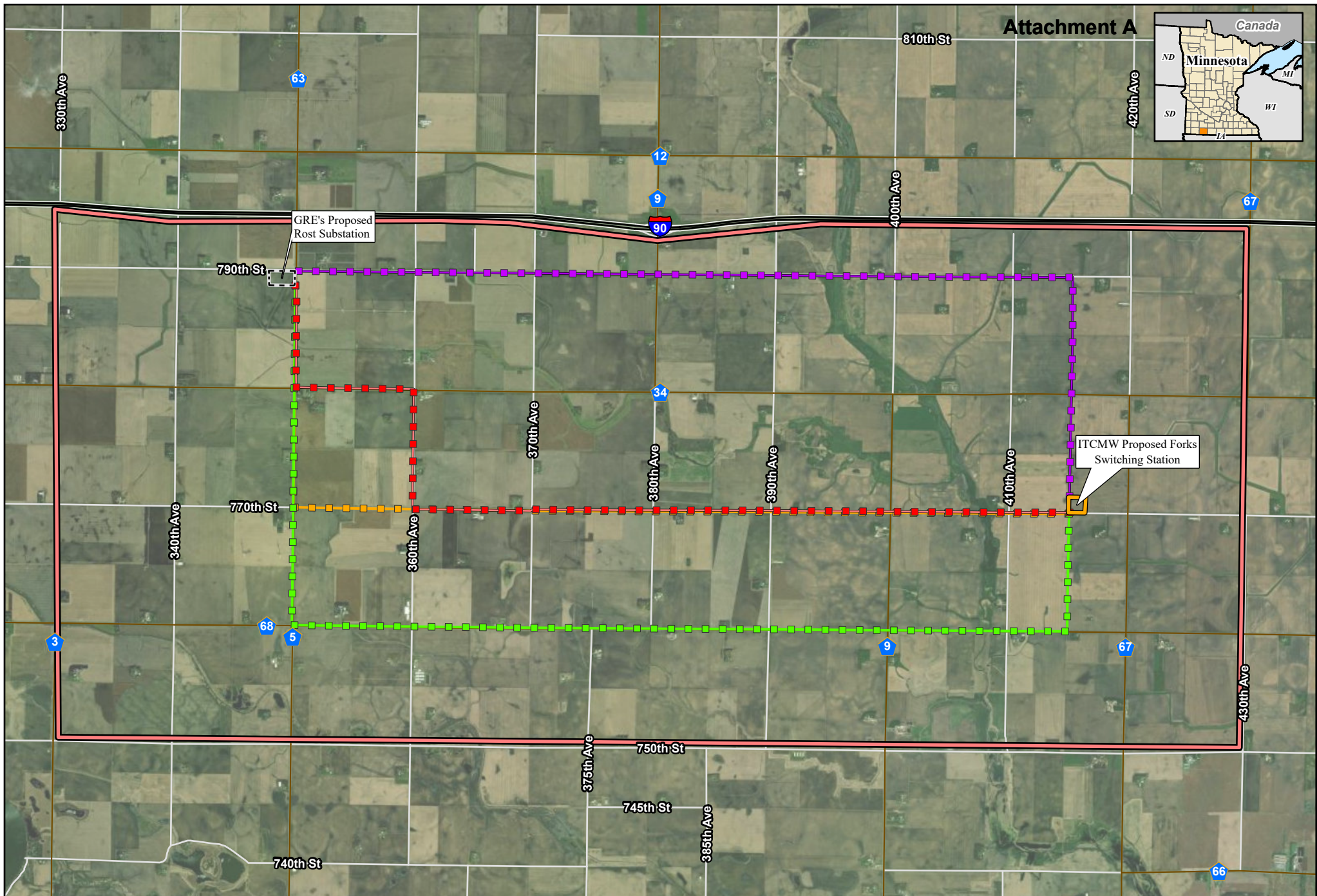


Figure 2 - Route Alternatives Considered but Rejected
Forks-Rost 161 kV Project
 ITC Midwest
 Jackson County, Minnesota



- | | |
|--|---------------------|
| Study Area | Proposed Route |
| ITCMW Proposed Forks Switching Station | Route Alternative 1 |
| GRE's Proposed Rost Substation | Route Alternative 2 |
| | Route Alternative 3 |

*In the Matter of the Application of ITC
Midwest LLC for a Route Permit for the 161
kV Transmission Line from Forks Substation
to Rost Substation in Jackson County,
Minnesota*

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CERTIFICATE OF SERVICE

Gustav Gerhardson certifies that on the 25th day of July, 2025, on behalf ITC Midwest LLC, he efiled a true and correct copy of the **Reply to EIP Staff's Comments on Applicant's Proposed Findings of Fact** by posting the same on [eDockets](#). Said filing is also served as designated on the attached Service List on file with the Minnesota Public Utilities Commission in the above-referenced docket number.

/s/ Gustav Gerhardson

Gustav Gerhardson

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Katherine	Arnold	katherine.arnold@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		No	24-232Official CC Service List
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3	Bret	Eknes	bret.eknes@state.mn.us		Public Utilities Commission	Suite 350 121 7th Place East St. Paul MN, 55101-2147 United States	Electronic Service		No	24-232Official CC Service List
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5	Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S. Eighth Street Minneapolis MN, 55402 United States	Electronic Service		No	24-232Official CC Service List
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7	James	Mortenson	james.mortenson@state.mn.us		Office of Administrative Hearings	PO BOX 64620 St. Paul MN, 55164-0620 United States	Electronic Service		Yes	24-232Official CC Service List
8	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		No	24-232Official CC Service List
9	Mark	Rothfork	mrothfork@itctransco.com	ITC Midwest LLC		100 East Grand Ave, Suite 360 Des Moines IA, 50309 United States	Electronic Service		No	24-232Official CC Service List
10	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix & Associates		7400 Lyndale Avenue South Suite 190 Richfield MN, 55423 United States	Electronic Service		Yes	24-232Official CC Service List