

BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION  
STATE OF MINNESOTA

In the Matter of the Application of Great River Energy, Otter Tail Power Co., Western Minnesota Municipal Power Agency, Agralite Electric Coop., and the City of Benson for a Certificate of Need and Route Permit for the Appleton to Benson 115 Kilovolt Transmission Line Project

MPUC DOCKET NO. ET-2, E-017, ET-6135, E-100/ CN-24-263; and  
ET-2, E-017, ET-6135, E-100/TL-24-264  
OAH DOCKET NO. 23-2500-40748

DIRECT TESTIMONY OF MARK STROHFUS

August 14, 2025

## I. INTRODUCTIONS AND QUALIFICATIONS

**Please state your name, employer, and business address.**

My name is Mark Strohfus. I am a Transmission Permitting, Project Manager, with Great River Energy. My business address is 12300 Elm Creek Boulevard, Maple Grove, Minnesota 55369.

**Please briefly describe your educational and professional background and experience.**

I have a BS in Pulp & Paper Science and Engineering from the University of Minnesota. In my 25 years at Great River Energy, I have worked as an environmental policy analyst, an environmental project lead, and currently as a project manager in the transmission permitting and land rights department. In my role as environmental project lead, I was responsible for managing and obtaining all environmental permits, including permits from the Minnesota Public Utilities Commission (Commission) for large electric generating facilities. In my current role as project manager, I am responsible for managing all aspects of environmental permitting, including Commission route permits for transmission projects, and advising Great River Energy staff on environmental and permitting implications during the early project planning phases. I had 12 years of experience as an environmental consultant prior to joining Great River Energy.

**What is your role with respect to the Appleton to Benson 115 kilovolt (kV) transmission line project (Project)?**

My role is to assist in selecting the Project route; assist with stakeholder outreach and community relations for the Project; coordinate and assist all Project Applicants in obtaining all necessary permits, licenses, and approvals for the construction and operation of the Project; coordinate and assist all Applicants' compliance with Route Permit Conditions; and ensure compliance with permit and license conditions through the construction and energization of the Project.

## What is the purpose of your Direct Testimony?

The purpose of my Direct Testimony is to provide a description of the Project, describe Great River Energy's and Agralite Electric Cooperative's (Agralite) (one of Great River Energy's member-owners) roles in the Project, discuss the Project schedule, provide updates regarding the Project, describe the Applicants' coordination and consultation with the Minnesota State Historic Preservation Office (SHPO), and briefly address the Environmental Assessment (EA) and Draft Route Permit prepared by the Commission Energy Infrastructure Permitting (EIP) Staff.

## Are other witnesses providing testimony in support of the Application?

Yes, the following witnesses are also providing direct testimony:

- Nick Goater discusses the need for the Project and the planning and need analysis presented in the Application.
- George Vinson discusses Otter Tail Power Company's (Otter Tail Power) role with respect to the Project.
- Brian Zavesky discusses the roles of Western Minnesota Municipal Power Agency (Western Minnesota)/Missouri River Energy Services (MRES) and the City of Benson with respect to the Project.

## II. THE PROJECT

**Please provide a summary of the Project.**

Great River Energy, Otter Tail Power, Western Minnesota through its agent MRES, Agralite, and the City of Benson are proposing to construct approximately 29 miles of new 115-kV high voltage transmission line (HVTL) from the City of Appleton to the City of Benson in Swift County, Minnesota. The Project also includes upgrading, rebuilding, reconductoring, and/or constructing new transmission lines between the following substations: Appleton, Shible Lake, Moyer, Danvers, Benson, and Benson Municipal Substations. The Shible Lake, Benson, and Benson Municipal Substations are existing substations that will be modified and/or

1 expanded to accommodate the Project's 115-kV connection. The Project also  
2 includes the construction of new Appleton substations. The Moyer and Danvers  
3 Substations will be expanded or relocated to accommodate connection to the  
4 Project.

5

6 **Q. Please provide an overview of Great River Energy and Agralite.**

7 A. Great River Energy is a not-for-profit wholesale electric power cooperative based  
8 in Maple Grove, Minnesota. Great River Energy provides electricity and related  
9 services to approximately 1.7 million people through its 27 member-owner  
10 cooperatives and customers. Through its member owners, Great River Energy  
11 serves two-thirds of Minnesota geographically and parts of Wisconsin. This  
12 includes Agralite, a distribution cooperative serving some of the area in which the  
13 Project will be located, and other transmission customers. Great River Energy's  
14 electric system is interconnected directly with neighboring suppliers and is a  
15 member of the Midwest Reliability Organization and the Midcontinent Independent  
16 System Operator.

17 Agralite, a member owner of Great River Energy, is an electric utility  
18 headquartered in Benson, Minnesota, which serves customers in west central  
19 Minnesota. Agralite serves members in the state's west central area from Swift  
20 County, most of Stevens and Big Stone Counties, and the southern part of Pope  
21 County. Agralite has present membership of more than 5,400 consumers, along  
22 with over 2,400 miles of distribution lines in service and 19 substations.

23

24 **Q. Describe the proposed route for the Project.**

25 A. The Project will include two route segments. The first Proposed Route segment  
26 will follow an approximately 27-mile route starting near the Western Minnesota-  
27 owned Appleton Substation in the City of Appleton and extend northeast  
28 connecting to the Great River Energy-owned Benson Substation, near the City of  
29 Benson. This route segment will involve upgrading approximately 18.3 miles of  
30 existing 41.6-kV transmission lines to 115-kV, rebuilding or reconductoring of 1.0  
31 mile of an existing 115-kV transmission line, and constructing 7.8 miles of new

1 115-kV line. This route segment and end point substation will connect with the  
2 following substations:

- 3 1. A new Appleton Transmission Substation (owned by Western Minnesota)
- 4 2. A new Appleton Distribution Substation, with a 115-kV connection to the  
5 new Appleton Transmission Substation (owned by Otter Tail Power)
- 6 3. Existing Shible Lake Substation (owned by Agralite)
- 7 4. Existing or new Moyer Substation (owned by Agralite)
- 8 5. Existing or new Danvers Substation (owned by Otter Tail Power)
- 9 6. Existing Benson Transmission Substation (owned by Great River Energy)
- 10 7. Existing Benson Municipal Substation (owned by the City of Benson)

11  
12 The second Proposed Route segment will be a new approximately 1.7-mile 115-  
13 kV transmission line between the existing Benson Municipal Substation and Great  
14 River Energy's existing AG-BK 115-kV transmission line.

15  
16 **Q. Will the Project generally follow existing transmission line right-of-way?**

17 A. Generally, yes. Approximately 67 percent of the Project will be constructed within  
18 existing transmission line right-of-way (ROW), and the Project will be co-located  
19 with existing road ROW for 68 percent of the Proposed Route. 8.0 miles of new  
20 construction is proposed. For the portions of the Project that will be upgraded,  
21 rebuilt, and/or reconductored, the Project will replace 41.6-kV and 115-kV facilities.

22  
23 **Q. Describe the work proposed to be performed at the Shible Lake Substation.**

24 A. The Shible Lake Substation is a distribution substation owned by Agralite. As part  
25 of the Project, it will be improved and modified to allow for connection to the 115-  
26 kV line. The improvement area of the substation will be approximately one acre,  
27 and the Applicants are requesting an approximately 9-acre route width around the  
28 Shible Lake Substation to accommodate potential modifications to the existing  
29 substation.

1   **Q.   Describe the work proposed to be performed at the Moyer Substation.**

2   A.   The Moyer Substation is also a distribution substation owned by Agralite. Agralite

3   has proposed to modify and expand the existing Moyer Substation or relocate the

4   Moyer Substation and decommission the existing substation. The improvement

5   area of the substation will be approximately 1-5 acres, and the Applicants are

6   requesting a 450-foot-wide route width near the existing Moyer Substation to

7   accommodate potential modifications to the substation.

8  
9     **Q. Does Great River Energy propose any modifications to its existing Benson**  
10     **Transmission Substation as part of the Project?**

11 A. The Benson Transmission Substation will be improved with facilities to allow for  
12 the connection of the 115-kV line.

### III. PROJECT SCHEDULE

16 Q. Section 3.5 of the Application states that the Project is expected to begin  
17 construction in 2028 and be energized in early 2030. Is that still the plan?

18 A. Yes. The final construction schedule is dependent on multiple factors, including  
19 the receipt of all required permits, but the Applicants plan to begin construction in  
20 2028 and energize the Project in 2030. The Project is expected to be constructed  
21 in separate phases to avoid extended outages on the distribution systems. The  
22 route permitting schedule, a primary permit in driving the Project's overall  
23 schedule, was included in Table 3.5-1 of the Application and is reproduced for  
24 convenience below.

**Table 3.5-1. Anticipated Permitting Schedule**

Certificate of Need / Route Permit Joint Application filed	December 2024
Scoping meeting	February 2025
Public hearing	August 2025
Commission meeting	November 2025
Written order issued	December 2025

1   **Q. Is Great River Energy requesting that a route permit issued by the**  
2   **Commission for the Project reflect the planned phased construction?**

3   A. Yes. Great River Energy requests discrete updates to the typical route permit to  
4   account for the planned phased construction. Applicants will address these  
5   updates in forthcoming comments on the EA and Draft Route Permit.

6

#### 7                   **IV. ROUTE DEVELOPMENT**

8

9   **Q. Please describe how the Applicants developed the Proposed Route.**

10   A. The Applicants used a multi-stage, interactive routing process to identify the  
11   Proposed Route that focused on the use of existing transmission/distribution lines  
12   or other utility and transportation ROWs. This process was intended to identify a  
13   Proposed Route that meets the objectives of the Project along with minimizing  
14   impacts to the environment in conformance with Minnesota's routing  
15   considerations. The iterative process started with development of an initial area for  
16   evaluation for the Project, which included routes that would connect the  
17   substations that I identified above.

18

19   **Q. Did the Applicants consider other routes as a result of this routing process?**

20   A. Yes. The initial review resulted in a more detailed study of five potential routing  
21   options – one of which ultimately became the Proposed Route, and four of which  
22   were considered but ultimately rejected. All options benefited from the presence of  
23   existing transmission lines, distribution lines, and road ROWs with which a  
24   potential route could co-locate. These other options are discussed in Section 5.2  
25   of the Application. The Applicants determined that the Proposed Route best  
26   balances the Commission's routing criteria, results in fewer wetland impacts,  
27   avoids impacts to land managed by the Minnesota Department of Natural  
28   Resources (MDNR), and satisfies other MDNR recommendations.

**Did the Applicants work with stakeholders in developing the Proposed Route and accept feedback on the Proposed Rout?**

Yes. The Applicants presented an initial route at open houses held in November 2023, and during meetings with agency stakeholders. Some additional refinements to the Proposed Route were made following these meetings and consultations with stakeholders. The Applicants also hosted open houses before the public information and scoping meetings in March 2025, where stakeholders and community members could ask questions of the Applicants regarding the Project.

## Were any other alternative routes proposed through the scoping process?

No, there were no other routes proposed during the scoping process.

## V. PROJECT UPDATES

## Are there any updates to the Project route?

Yes. As it concerns the alignment within the City of Benson, the Applicants have been evaluating the possibility of overtaking the existing Benson Municipal 115-kV line that follows the BNSF railroad tracks and constructing the Project as a double circuit line. This evaluation is ongoing.

**Please describe updates to the substation construction/expansion plans.**

At the time the Application was submitted, Applicants were evaluating three separate parcels upon which to locate a new Western Minnesota Appleton Transmission Substation and a new Otter Tail Power Appleton Distribution Substation. See Application Section 3.2. We have been working with the landowner of the site option located directly north of the existing Appleton Substation and believe that an agreeable purchase agreement will be reached.

## VI. SHPO STATUS UPDATE

Q. The Commission authorized the Applicants to initiate consultation with SHPO related to the Project and directed the Applicants to inform the Commission of the status of that consultation. Are you aware of that authorization?

A. Yes. In this section of my Direct Testimony, I will provide an update regarding our coordination with SHPO regarding the Project. I will also describe our coordination with Tribal Nations regarding the Project.

**Q. Please describe the cultural resources analysis the Applicants have conducted for the Project.**

A. As discussed in Sections 2.4.2.2 and 7.5 of the Application, the Applicants submitted a literature review of archaeological and historic properties in the Project area to the Minnesota SHPO in a letter dated October 22, 2024. SHPO provided a response to this letter on November 26, 2024, and recommended archaeological surveys based on the location and nature of the Project. This correspondence is included as Appendix K to the Application. The Applicants intend to conduct an archaeological survey on the selected route.

**Q. Do you have updates regarding SHPO coordination since the Application was filed?**

A. No, not at this time. As I noted, once the Commission selects a route for the Project, the Applicants will conduct the archaeological survey recommended by SHPO and submit the results of that survey for SHPO review and concurrence.

**Q. Have the Applicants requested input from Tribal Nations regarding the Project?**

A. Yes. The Applicants requested feedback on the Project from the 11 federally recognized Tribes with geography within Minnesota and the Minnesota Indian Affairs Council (MIAC) in its Project notification letters sent in September 2024.

1 The Applicants have received a response from the Leech Lake Band of Ojibwe  
2 Tribal Historic Preservation Officer (THPO) confirming that the Leech Lake Band  
3 of Ojibwe does not have any recorded historic properties within the Project area.  
4 On October 23, 2024, the Applicants sent a notification to the THPOs associated  
5 with the 11 federal recognized Tribes to offer a copy of the literature review  
6 submitted to the SHPO. The Shakopee Mdewakanton Sioux Community THPO  
7 and the Upper Sioux Community THPO requested a copy, which was provided on  
8 October 23, 2024. The Shakopee Mdewakanton Sioux Community THPO  
9 responded that because no burials were identified as being impacted by the  
10 proposed Project and because an Unanticipated Discoveries Plan will be  
11 developed for the Project, the THPO has no concerns with the Project. This  
12 correspondence is included as Appendix K to the Application. The Applicants will  
13 continue to keep Tribes updated regarding the Project.

14

## 15 **VII. ENVIRONMENTAL ASSESSMENT & DRAFT ROUTE PERMIT**

16

17 **Q. Have you reviewed the EA and Draft Route Permit prepared by the EIP Staff  
18 for the Project?**

19 A. Yes, I have reviewed these documents. EIP Staff filed the EA on July 31, 2025,  
20 and included with the EA was a Draft Route Permit.

21

22 **Q. Do the Applicants have any response or clarifying comments to the EA and  
23 Route Permit?**

24 A. Yes. The Applicants appreciate EIP Staff's thorough review of the Project, and the  
25 EA generally captures the potential impacts of the Project. The Applicants will be  
26 providing responses to the EA and the Route Permit which will be submitted as  
27 part of the Applicants' forthcoming comments.

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29

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## **VIII. CONCLUSION**

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**3 Q. Does this conclude your Direct Testimony?**

4 A. Yes.

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