

February 20, 2025

**VIA eDOCKETS**

Will Seuffert  
Executive Secretary  
Public Utilities Commission  
121 Seventh Place East, Suite 350  
Saint Paul, MN 55101-2147

RE: Minnesota Energy Connection Project  
Exceptions to ALJ Report  
Docket Nos. E-002/CN-22-131 and E-002/TL-22-132

Executive Secretary Seuffert:

On January 29, 2025, Energy Environmental Review and Analysis staff filed its *Comments Concerning Applicant's Proposed Findings* (eDockets No. 20251-214591-01) for the Minnesota Energy Connection project. On February 5, 2025, Administrative Law Judge Todnem filed her *Findings of Fact, Conclusions of Law, and Recommendations* (eDockets No. 20252214994-01).

EERA staff has reviewed Judge Todnem's report (ALJ report). Staff observes that Judge Todnem incorporated few of EERA staff's comments regarding the applicant's proposed findings. Though staff believes its comments, had they been incorporated into the ALJ report, would substantially strengthen the record, staff does not present them here again, in total, as exceptions to the ALJ report.

Staff does provide the following exceptions to the ALJ report:

**EERA Route Recommendation**

Staff recommends that the ALJ report reflect EERA's revised Summary of Recommendations; Findings 195, 501, 619, 665, 672, 674, 683 (Table 10), 692, and 693; Conclusions 12 and 13; and Recommendation regarding the route for the project. EERA staff believes that these Findings reflect the route that is most consistent with applicable statutory and rule guidance.

**Scoping Process – Public Participation**

Staff recommends that the ALJ report reflect EERA's revised Findings 200 – 202 regarding the public's participation in the public information and environmental impact statement scoping meetings for the project.

**Permit Conditions**

Staff recommends that the ALJ report reflect EERA's revised Findings 696 – 699 regarding special permit conditions for the project. EERA staff believes that these permit conditions are supported by and responsive to the record.

Staff further recommends that revised Finding 361 concerning residential properties being “boxed in” with existing transmission lines 200 kV or higher be included.

EERA appreciates the opportunity to provide these exceptions and is available to answer any questions the Commission might have.

Sincerely,

A handwritten signature in blue ink, appearing to read 'A. Levi', is positioned above the printed name.

Andrew Levi

Energy Environmental Review and Analysis