



Fredrikson & Byron, P.A.
Attorneys and Advisors

60 South Sixth Street, Suite 1500
Minneapolis, MN 55402-4400
Main: 612.492.7000
fredlaw.com

June 9, 2025

VIA E-FILING

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

The Honorable Kimberly Middendorf
Office of Administrative Hearings
600 North Robert Street
P.O. Box 64620
St. Paul, MN 55164-0620

**Re: In the Matter of the Application for a Route Permit for a 115-kV Laketown
Transmission Line and Associated Facilities Project in Carver County, Minnesota
OAH Docket No. 21-2500-40445
MPUC Docket No. ET-2/TL-24-132**

Dear Mr. Seuffert and Judge Middendorf:

Great River Energy and Minnesota Valley Electric Cooperative (Applicants) respectfully submit these comments in response to the oral comments made at the public hearings held on May 21 and 22, 2025, and to the written comments submitted during the public comment period ending June 2, 2025, related to the Applicants' Application for a Route Permit (Application) for an approximately 4.3-mile, 115-kilovolt (kV) transmission line and proposed new Laketown Substation in Carver County, Minnesota (the Project).

During the comment period, written comments were submitted by the Department of Commerce, Energy Environmental Review & Analysis (EERA), the interagency Vegetation Management Planning Working Group (VMPWG), the Minnesota Department of Natural Resources (MDNR), local units of government consisting of Carver County Public Works, the City of Carver, and the City of Victoria, and members of the public. Comments generally focused on the Proposed Route, Route Alternative A, and Route Alternative C. No comments were provided in support of Route Alternative B or Alternative Alignment D.

The Applicants appreciate the engagement and interest of the public and local governments in this process and the Project. The level of engagement reflected in this record highlights both that the Project is needed to support the area's continued growth and development, and also that the transitional nature of the broader area (i.e., transitioning from rural agricultural to developed) can present unique considerations for routing new energy infrastructure. From the beginning, the

Applicants were aware of those considerations, as reflected in the detailed routing analysis in the Application—both for the Proposed Route and alternative routes. The Applicants understand there are competing considerations, and the Minnesota Public Utilities Commission (Commission) will ultimately select the route that it determines best balances its routing criteria. The Applicants respectfully submit that the Proposed Route has been thoughtfully designed and routed to avoid and/or minimize human and environmental impacts to the greatest extent practicable. The Project makes efficient use of available land while minimizing adverse human and environmental impacts, and, overall, the Project complies with the Commission’s routing criteria. Accordingly, the Applicants continue to support the Proposed Route for the Project, as discussed further here and elsewhere in this record.

I. RESPONSE TO AGENCY COMMENTS.

A. EERA

EERA filed comments on June 2, 2025.¹ EERA proposes revisions to the Draft Route Permit to include Project-specific information, as well as reiterates a proposed Special Condition 6.1 regarding a Phase I archaeological survey and submission to the State Historic Preservation Office (SHPO). As stated previously, the Applicants have no objection to the Special Condition, and Great River Energy will conduct a Phase I archaeological survey of the route selected by the Commission and the Laketown Substation and adhere to the requirements of Draft Route Permit Special Condition Section 6.1.² EERA also states that it has no further comments on the Applicants’ comments on the EA, submitted on May 13, 2025. The Applicants appreciate EERA’s review of their comments.

EERA further responds to an oral comment made during the public hearing regarding the Proposed Route’s crossing of land enrolled in the Metropolitan Agricultural Preserves Program (MAPP) and subject to Minn. Stat. Ch. 473H. As discussed in the Application, the Proposed Route crosses 3.8 miles of land that is enrolled in MAPP. This program was established in 1980 to encourage and preserve areas planned and zoned for long-term agricultural use within the seven-county metropolitan area. The purpose of the statute is to encourage the use and improvement of the metropolitan area’s agricultural lands for producing food and other agricultural commodities. It establishes a local planning process to designate agricultural areas as a long-term land use and provides benefits to maintain viable, productive farm operations. Moreover, Minn. Stat. § 473H.11 puts limitations on certain public projects that are inconsistent with agricultural uses. Transmission lines, such as the Project, are generally compatible with continued agricultural uses, and the Laketown Substation is not sited on property subject to MAPP.³ As such, the Applicants do not anticipate that any restrictions included in MAPP will apply to the Project.⁴

¹ EERA Post-Hearing Comments (June 2, 2025) (eDocket No. [20256-219470-01](#)).

² Ex. APP-21 at 10 (Direct Testimony of M. Swenson).

³ Ex. APP-21 at 6-21 (Application).

⁴ Even if the MAPP restrictions did apply to transmission lines, none of the easements obtained for the Proposed Route on lands enrolled in MAPP are anticipated to be greater than 10 acres.

B. VMPWG

The VMPWG submitted comments on the Project's Vegetation Management Plan (VMP) on June 2, 2025.⁵ The Applicants appreciate the VMPWG's feedback and will work with the VMPWG regarding the Project's VMP.

C. MDNR

MDNR filed comments on June 2, 2025, regarding a natural heritage review, vegetation removal, avian flight diverters, facility lighting, dust control, wildlife-friendly erosion control, public waters, and water appropriation.⁶

1. Natural Heritage Review

MDNR recommends inclusion of a special condition that the Applicants comply with applicable requirements related to state-listed endangered and threatened species in accordance with Minnesota's Endangered Species Statute. Applicants will follow applicable state statute in constructing the Project.

MDNR also recommends a special condition, included in a previously issued route permit by the Commission that the Applicants work with MDNR to determine if any impacts will occur to a calcareous fen in the vicinity of the Project.⁷ As stated in the Application, once a final route has been selected, the Applicants will further coordinate with the MDNR to ensure that ground disturbance activities, such as pole placement, do not disrupt potential groundwater hydrology associated with the calcareous fen.⁸ Applicants do not anticipate that the Proposed Route and Project will impact this calcareous fen, but do not object to the inclusion of this condition in the Route Permit and ongoing consultation with MDNR.

2. Vegetation Removal

MDNR recommends inclusion of a special condition that the Applicants conduct winter tree clearing for the Project to minimize impacts to nesting birds and roosting bats. Applicants will comply with applicable regulations and U. S. Fish and Wildlife Service (USFWS) requirements related to tree clearing and will continue to coordinate with the USFWS prior to construction of the Project. Applicants do not support MDNR's recommendation because it is broader than typically required by the Commission and not necessitated by this Project. The MDNR's MCE review MCE-23-00902, referenced in these June 2, 2025, comments, indicated that no state-listed endangered or threatened species, including bats, have been documented within the vicinity of the

⁵ Minnesota Interagency Vegetation Management Planning Working Group Public Comment (June 2, 2025) (eDocket No. [20256-219479-01](#)).

⁶ MDNR Comment (June 2, 2025) (eDocket Nos. [20256-219508-01](#); [20256-219508-02](#)).

⁷ *In the Matter of the Application for a Route Permit for the Alexandria to Big Oaks 345 kV Transmission Project in Central Minnesota*, Order Granting Certificate of Need and Issuing Route Permit (Oct. 30, 2024) (Docket No. TL-23-159; CN-22-538).

⁸ Ex. APP-21 at 6-36 (Application).

Project. In addition, the USFWS Determination Key completed by the Applicants and provided as an appendix to the Application indicated that “the action area is not located within 0.5-miles of a known northern long-eared bat hibernaculum” and “the Project does not intersect known sensitive areas for northern long-eared bats.”

Further, limiting tree clearing to the winter months is not always feasible or practical. Applicants have already committed to taking measures to minimize the impact of vegetation clearing on birds and wildlife, including the use of best management practices and conducting clearing in wetlands when the ground and wetlands are frozen, or using construction mats to minimize impacts to vegetation.⁹

3. *Avian Flight Diverters*

MDNR recommends inclusion of a special permit condition included in a previously issued route permit by the Commission regarding installation of avian flight diverters.¹⁰ Applicants do not object to the proposed condition and note that it is already included in Section 5.3.16 of the Draft Route Permit.

4. *Facility Lighting*

MDNR recommends adding a special permit condition included in a previously issued route permit by the Commission regarding facility lighting.¹¹ Applicants do not object to the inclusion of this condition in the Route Permit.

5. *Dust Control*

MDNR recommends adding a special permit condition included in a previously issued route permit by the Commission regarding avoiding use of certain products for dust control.¹² Applicants do not object to the inclusion of this condition in the Route Permit.

6. *Wildlife-Friendly Erosion Control*

MDNR recommends adding a special permit condition included in a previously issued route permit by the Commission regarding use of wildlife-friendly erosion control.¹³ Applicants do not object to the inclusion of this condition in the Route Permit.

⁹ Ex. APP-2 at 5-3; 6-43 – 6-44 (Application).

¹⁰ The route permit and docket referenced by MDNR is *In the Matter of the Application of Minnesota Power and Great River Energy for a Certificate of Need and Route Permit for an Approximately 180-mile, Double Circuit 345- kV Transmission Line*, Order Granting Certificate of Need and Issuing Route Permit (Feb. 28, 2025) (TL-22-415; CN-22-416) (hereafter cited as “Docket No. 22-415”).

¹¹ See Docket No. 22-415.

¹² See Docket No. 22-415.

¹³ See Docket No. 22-415.

7. *Public Waters*

MDNR notes that Route Alternative C and Alternative Alignment D cross a public water watercourse and that certain MDNR approvals may be required, and that the MDNR supports an alternative that avoids crossing or working within these waters. The Applicants will obtain necessary permits and approvals from MDNR for the route selected by the Commission.

8. *Water Appropriation*

MDNR also provides information related to a water appropriation permit. Dewatering is not expected for the Project.¹⁴ If dewatering is necessary and requires a water appropriation permit from MDNR, the Applicants will obtain such a permit.

II. RESPONSE TO LOCAL UNITS OF GOVERNMENT.

A. Carver County Public Works

Carver County Public Works (or, County) submitted written comments dated May 13, 2025.¹⁵ The County states that it “supports GRE’s proposed alignment of the proposed transmission line, as it will have the least impact on current and future County highways,” and that it opposes the CSAH 10 route alternative—Route Alternative A as studied in the Environmental Assessment (EA)—due to conflict with the future realignment and reconstruction of CSAH 10.¹⁶

The Applicants agree that the Proposed Route will have the least impact on County highways. As noted in the Application, Great River Energy considered but rejected Route Alternative A due to greater impact on existing residences located directly along CSAH 10, and a greater number of road crossings needed to avoid impacting existing structures and provide proper setbacks along CSAH 10.¹⁷ In addition, as noted in the County’s comments and reflected in the record, Route Alternative A would impact the County’s long-standing and detailed plans for the reconstruction/realignment and expansion of CSAH 10.¹⁸ The current conceptual plan for that realignment/expansion was provided in earlier comments, and a more detailed map is included in **Attachment 1** here. Great River Energy understands that the County intends for the new CSAH 10 to have a 220-foot right-of-way, which is wider than the current 120-foot right-of-way.

¹⁴ Ex. APP-2 at 6-34 (Application).

¹⁵ Carver County Public Works Comments (May 13, 2025) (eDocket No. [20255-218997-01](#)).

¹⁶ With respect to Route Alternative A, the EA studies an alignment that includes one crossing of Xcel Energy’s existing 230-kV line. For Route Alternative C, the EA studies an alignment that travels on the north side of the existing 230-kV line. No alternatives to these alignments were supported in any comments during the public comment period, and the Applicants have not studied any such alternative alignments. However, as the Commission is aware, increased line crossings can present reliability concerns and also involve additional specialty structures and construction techniques, which could increase impacts.

¹⁷ Ex. APP-2 at 4-8 (Application).

¹⁸ Ex. APP-2 at 4-9 (Application); Ex. APP-19 at 6-7 (Direct Testimony of M. Swenson).

Great River Energy also analyzed a variation of Route Alternative A to determine whether it would be possible to design an alignment for the Project that would follow, today, the potential future realignment and widening of CSAH 10, based on the information that Carver County has prepared to date. As an initial matter, however, such an alignment would be speculative because the design and right-of-way needs of CSAH 10 have not been finalized. Great River Energy has continued coordination with the County throughout this process and met with Carver County Public Works on June 5, 2025. At the meeting, Carver County stated that they anticipate constructing the CSAH 10 project in 2029, although no specific plans have been finalized. As shown on the detailed map set included in Attachment 1, there are several existing residences that may be displaced by the CSAH 10 project. With the current level of information and planning available, the Project cannot assume which residences, if any, would be displaced by the CSAH 10 project, or what ultimate alignment the redesigned CSAH 10 would follow. If the alignment of Route Alternative A were modified to follow the preliminary CSAH 10 design, the Project would be placed farther into properties potentially closer to existing residences or further away from CSAH 10 into agricultural fields, including by going behind homes. However, even this preliminary alignment is subject to change. In short, if Route Alternative A is selected and the Project were to follow the existing CSAH 10, it would be in proximity to more homes and would later need to be relocated to accommodate the road project, with additional costs and environmental impacts. If, instead, the Project were to follow the potential future expanded and realigned CSAH 10, the Project would be farther into properties and fields, closer to homes, and could result in the displacement of homes that is not otherwise required for the needs of the Project.

B. City of Carver

The City of Carver submitted comments dated May 20, 2025, and May 22, 2025,¹⁹ and Mayor Courtney Johnson submitted comments dated June 2, 2025.²⁰ Members of the City Council and the Mayor also spoke at the public hearings.²¹ The City of Carver reiterated prior comments that it should have been engaged earlier in the routing process, and expressed concern that the Proposed Route would impact its plans for future development on land presently located outside the City of Carver, but within Dahlgren Township. The City of Carver representatives did not express an official preference for another route; members of the City Council and the Mayor stated individually that they preferred, instead, a route along a 230-kV powerline through the City of Victoria (Route Alternative C) or Route Alternative A, along CSAH 10, also through the City of Victoria.²²

¹⁹ City of Carver Comments (May 20, 2025) (eDocket No. [20255-219148-01](#)); City of Carver Comments (May 22, 2025) (eDocket No. [20255-219194-02](#)). The May 22, 2025 comments were the same as previously filed, and attached an additional figure.

²⁰ Mayor Courtney Johnson Written Comment (June 2, 2025) (eDocket No. [20256-219581-01](#)).

²¹ See WebEx 6:00 p.m. Public Hearing Transcript (WebEx 6:00 p.m. Tr.) at 23-30 (May 22, 2025); Chaska Public Hearing Transcript (Chaska 6:00 p.m. Tr.) at 22-24, 37-40, 47-51 (May 21, 2025).

²² In separate written comments, the City of Carver Mayor expressed her view that Project staff were not appropriately receptive to questions and comments during the public open house. The Applicants are

As an initial matter, because the Project is not within or immediately adjacent to the City of Carver, the Applicants did not directly consult the City of Carver as part of its initial Project development.²³ However, because the Project was proposed to cross Dahlgren Township, the Applicants met with Dahlgren Township on July 8, 2024, prior to submittal of the Application. No annexation agreement between Dahlgren Township and the City of Carver was mentioned as a concern relative to the Project²⁴ Following the submission of the City of Carver's scoping comments, and once the Applicants were aware of the level of concern, the Applicants met with the City of Carver initially on November 1, 2024, and again on May 7, 2025. During these meetings the Applicants discussed the Project routing process along with the state permitting process and committed to ensuring the City of Carver was kept informed of the Project moving forward. More recently, Great River Energy again offered to meet with City representatives or present to the City Council. See **Attachment 2**. The City invited Great River Energy to attend a July 2025 City Council meeting.

Specific to the Project, approximately 3.1 miles of the Proposed Route is within Dahlgren Township between mileposts (MPs) 0.0 to 3.1; at its closest, the Proposed Route at MP 0.0 is approximately 0.5 mile north of the City of Carver boundary, in an agricultural area. The Proposed Route then travels away from the City of Carver.²⁵

According to an August 2018 map provided by the City of Carver, the Project would cross 1.7 miles of land that is presently outside the city and within the City of Carver's "ultimate growth boundary," 1.5 miles of which is identified with the future land use type of "low density residential" and 0.2 mile of which is along Hampshire Road, identified with the future land use type of "commercial/industrial." This land has not yet been annexed and remains outside City boundaries. In this area, the Proposed Route follows an existing road and property lines. Despite the presence of this area within the City of Carver's Orderly Annexation Agreement, no specific plans for annexation or development in this area have been identified by the City of Carver, and the area remains in agricultural use. To provide context, photographs from June 2025 of the location where the Proposed Route crosses the portion of this area along Hampshire Road are included in **Attachment 3**:

- Photo 3-A depicts Guernsey Avenue, traveling southbound. Great River Energy's existing 115 kV MV-VTT line is on the western edge of the road.
- Photo 3-B depicts the intersection of Guernsey Avenue and Hampshire Road, facing west.

disappointed in this feedback, as numerous Project staff were on-site to engage with interested attendees, and Project staff had detailed and cordial conversations about the Project with open house attendees.

²³ Ex. APP-17 at 2 (Response to Scoping Comments).

²⁴ Ex. APP-17 at 3 (Response to Scoping Comments).

²⁵ Ex. APP-17 at 3 (Response to Scoping Comments).

- Photo 3-C depicts Hampshire Road, facing northwest, near the beginning of the Project.
- Photo 3-D depicts Hampshire Road, facing northwest.
- Attachment 3-E depicts Hampshire Road, facing northwest. The existing MVEC distribution line is alongside the north edge of the road.

Furthermore, the Project as proposed is compatible with all current and future land use types considered by the City of Carver for potential future annexation in this area, including agriculture, low density residential, and/or commercial/industrial. 115-kV systems commonly exist in areas with similar zoning. Great River Energy's existing 115-kV MV-VTT line shown on Photo 3-A is also within the area considered under the City of Carver's Orderly Annexation Agreement, from the point where the Project connects to it, north to CSAH 11. These areas are marked on the City of Carver's August 2018 as low density residential, high density residential, and commercial. The presence of this existing line will not preclude development along Guernsey Road to CSAH 11.

Should these areas be annexed in the future, the Proposed Route would not preclude future development within the area considered by the City of Carver for future annexation. Rather, the timing of the Project (now) and potential future development (approximately 15 years in the future, based on the 2040 Comprehensive Plan's post-2040 growth timeline for this area) is compatible, such that the timing and placement of the Project's Proposed Route does not interfere with identified planned developments. 115-kV service is critical to reliable service, and should the areas considered by the City of Carver be annexed for growth and development down the road, the 115-kV system put in place as part of the Project will support that growth.

Based on other existing 115-kV systems, residential and commercial development can and will proceed around the transmission line. For example, the Commission recently approved Great River Energy's application to rebuild a transmission line in Burnsville, Eagan, Apple Valley; commercial and residential development had grown up substantially around the line, and there was no indication in the record that the line had at all inhibited growth.²⁶ Here, too, the Proposed Route does not inhibit future growth—instead, it supports it.

C. City of Victoria

The City of Victoria submitted comments dated May 22, 2025.²⁷ A representative from the City of Victoria also spoke at both the in-person and virtual public hearings.²⁸ The City of Victoria

²⁶ See *In the Matter of the Application of Great River Energy for a Route Permit for the 115-kV Pilot Knob to Burnsville Rebuild and Upgrade Project in Dakota County, Minnesota*, Docket No. TL-23-410, Environmental Assessment at 29 (Aug. 2024) (noting that “[l]and cover along the transmission line route is predominantly developed”).

²⁷ City of Victoria Comments (May 22, 2025) (eDocket No. [20255-219194-01](#)).

²⁸ See WebEx 6:00 p.m. Public Hearing Transcript (WebEx 6:00 p.m. Tr.) at 28-30 (May 22, 2025); Chaska Public Hearing Transcript (Chaska 6:00 p.m. Tr.) at 22-24, 37-40, 50-51 (May 21, 2025).

opposes the Xcel Energy transmission line alternative, studied as Route Alternative C in the EA. The City explains that many properties within Route Alternative C “reside in our future commercial and flex-employment growth areas for the city. Development of these properties is in our current comprehensive plan and has been highly anticipated for the last few decades.” The City of Victoria acknowledges the need for the Project, but reiterates that Route Alternative C would impact existing and ongoing development plans. The representative from the City Victoria also noted at the public meeting that groundbreaking on a new Kwik Trip gas station was directly underneath this alternative.

Great River Energy also considered but rejected Route Alternative C in the Application.²⁹ Since submittal of the Application, this area has experienced annexation into the City of Victoria and construction projects are actively being built along the alignment of the alternative. Route Alternative C would cross directly over the southern portion of a Kwik Trip gas station that is currently under construction, including two new roads, associated tree plantings along the road, and near gas pumps.³⁰ Photos 3-F, 3-G, and 3-H from June 2025 depicting this development are included in **Attachment 3**.

Adjustment of the Route Alternative C to avoid the Kwik Trip would likely interfere with future development plans on this parcel submitted by the developer to the City of Victoria, including building collector roadways, utilities, and potential future commercial/retail, dining, and high-density residential and senior living facilities.³¹ A new residential development (West Creek Village, a residential development that presently includes 56 row townhomes, 18 twinhomes; and 36 single-family homes) has been proposed and is seeking City approval farther to the west of the Kwik Trip parcel. Finally, because the existing 230-kV line is cross-country (does not follow a road), placing another right-of-way along that existing line would increase the magnitude of potential impact.³² The development occurring along the 230-kV does indicate that commercial and residential development can occur alongside transmission lines; however, the timing of the placement of the transmission line is important relative to that development (i.e., it is preferable that it comes first).

The development within the City of Victoria is presently occurring, and placement of a 115-kV transmission line in this area would certainly disrupt a business that is currently under construction and a residential development currently seeking approval from the City.

²⁹ Ex. APP-2 at 4-9 (Application).

³⁰ Ex. APP-21 at 7-8 (Comments Regarding EA).

³¹ Ex. APP-21 at 8 (Comments Regarding EA).

³² Ex. APP-19 at 8 (Direct Testimony of M. Swenson).

III. RESPONSE TO OTHER COMMENTS.

A. Response to Comments at Public Hearings.

Members of the public made oral comments and asked questions during the in-person public hearing on May 21, 2025, and the virtual public hearing on May 22, 2025.³³ Where appropriate, Great River Energy provided responses to questions and comments during the public hearings. Most of the public hearing comments related to the Proposed Route and route alternatives, and those issues are discussed above in these comments.

In addition, members of the public along the Proposed Route in Dahlgren Township between Hampshire Road and Augusta Road expressed concern that the route in that area did not follow a road.³⁴ Although Great River Energy initially considered routing along Hampshire Road until its intersection with Augusta Road to maximize collocation with existing infrastructure, there are existing residences on that portion of the road and in close proximity to the road. Great River Energy sought to distance the project from this concentrated development. Thus, instead, the Proposed Route follows property lines between Hampshire Road and Augusta Road to limit residential impacts. Given agricultural activities in this area, Great River Energy specifically designed the Proposed Route to follow these property lines (rather than traversing through fields) to avoid and limit potential impacts to agricultural operations.

B. Response to Other Written Comments.

1. Pierson Lake, LLC

Cathy Brunkow submitted written comments dated May 30, 2025, on behalf of Pierson Lake, LLC.³⁵ Pierson Lake, LLC is a family entity that owns 150 acres of land on CSAH 10. Pierson Lake, LLC opposes Route Alternative A due to impact on property and effect on residences. The Applicants agree that Route Alternative A, which is also opposed by Carver County, would have a greater impact on residences, as the Project's alignment would need to be shifted closer to 13 existing homes that are located within 200 feet following Carver County's realignment and expansion project along CSAH 10.³⁶ Moreover, the density of residential homes and businesses on either side of the highway would require that Great River Energy make 12 crossings of the road to avoid impacting existing structures and provide proper setbacks.³⁷ For these reasons, the Applicants maintain that the Proposed Route is preferable and less impactful than Route Alternative A.

³³ See WebEx 6:00 p.m. Public Hearing Transcript (WebEx 6:00 p.m. Tr.) at 23-30 (May 22, 2025); Chaska Public Hearing Transcript (Chaska 6:00 p.m. Tr.) at 22-55 (May 21, 2025).

³⁴ Chaska Public Hearing Transcript (Chaska 6:00 p.m. Tr.) at 53 (May 21, 2025).

³⁵ Pierson Lake, LLC Written Comment (June 2, 2025) (eDocket No. [20256-219463-01](#)).

³⁶ Ex. APP-21 at 15 (Comments Regarding EA).

³⁷ Ex. APP-21 at 18 (Comments Regarding EA).

2. *Tim & Patty Eiden*

Tim and Patty Eiden submitted written comments on May 31 and June 3, 2025. The Eidens submitted photographs of their property near the Proposed Route. The Eidens also invited agency staff to tour their property, stating that a tour would “offer a clearer understanding of the potential environmental and community impact.” The Proposed Route in this area is within Dahlgren Township and follows Hampshire Road before then following property lines to increase proximity from existing homes. Great River Energy staff met with the Eidens on November 7, 2024 and toured their property. Great River Energy appreciates this prior invitation from the Eidens and looks forward to continued coordination if the Proposed Route is selected. Great River Energy understands that portions of agricultural fields may be wet after rainfall events, but does not anticipate that the conditions in this area would preclude safe and reliable construction and operation of the Project.

IV. CONCLUSION.

The Applicants appreciate this opportunity to reply to the oral comments at the public hearings and the written comments submitted during the public comment period. Because the record supports doing so, the Applicants respectfully request that the Administrative Law Judge recommend that the Commission issue a route permit for the Project along the Proposed Route.

This document has been e-filed through www.edocket.state.mn.us. A copy of this filing is also being served upon the persons on the Official Service List of record. Please let me know if you have any questions regarding this filing.

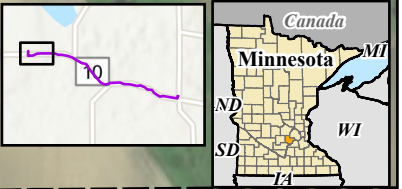
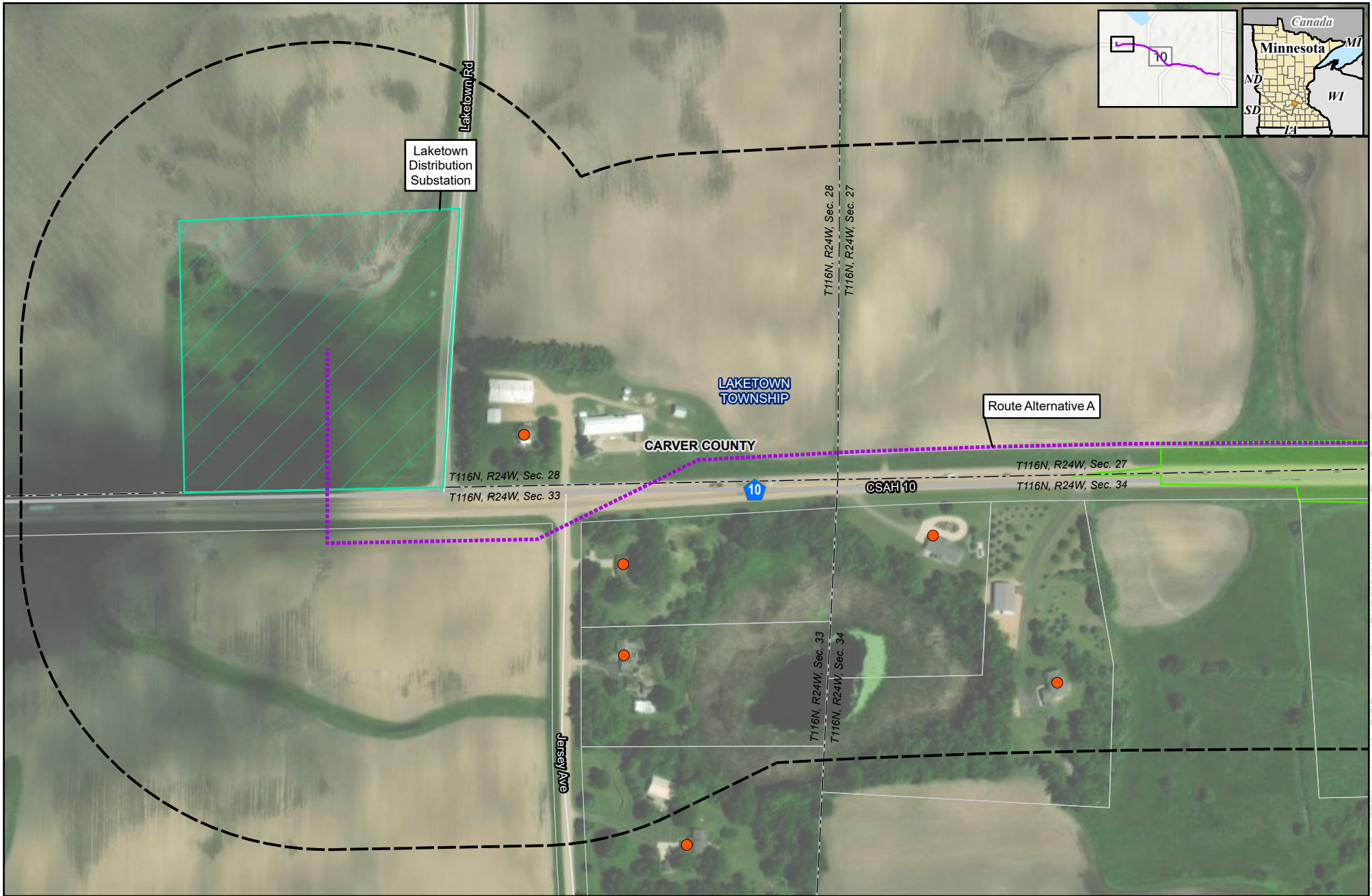
Sincerely,

FREDRIKSON & BYRON, P.A.

/s/ Haley Waller Pitts

Haley L. Waller Pitts

Direct Dial: (612) 492-7443
Email: hwallerpitts@fredlaw.com



0 150 300 Feet
1 inch = 300 feet



**Laketown 115-kV Transmission Line Project
Attachment 1
Carver County, Minnesota
Page 1 of 6**

- Route Alternative A
- Substation Parcel Boundary
- Route Width
- Improvement: Highway 10 Western Subarea – West
- Residence
- Parcel Boundary
- Section Boundary
- Township Boundary
- County Boundary



0 150 300 Feet
1 inch = 300 feet

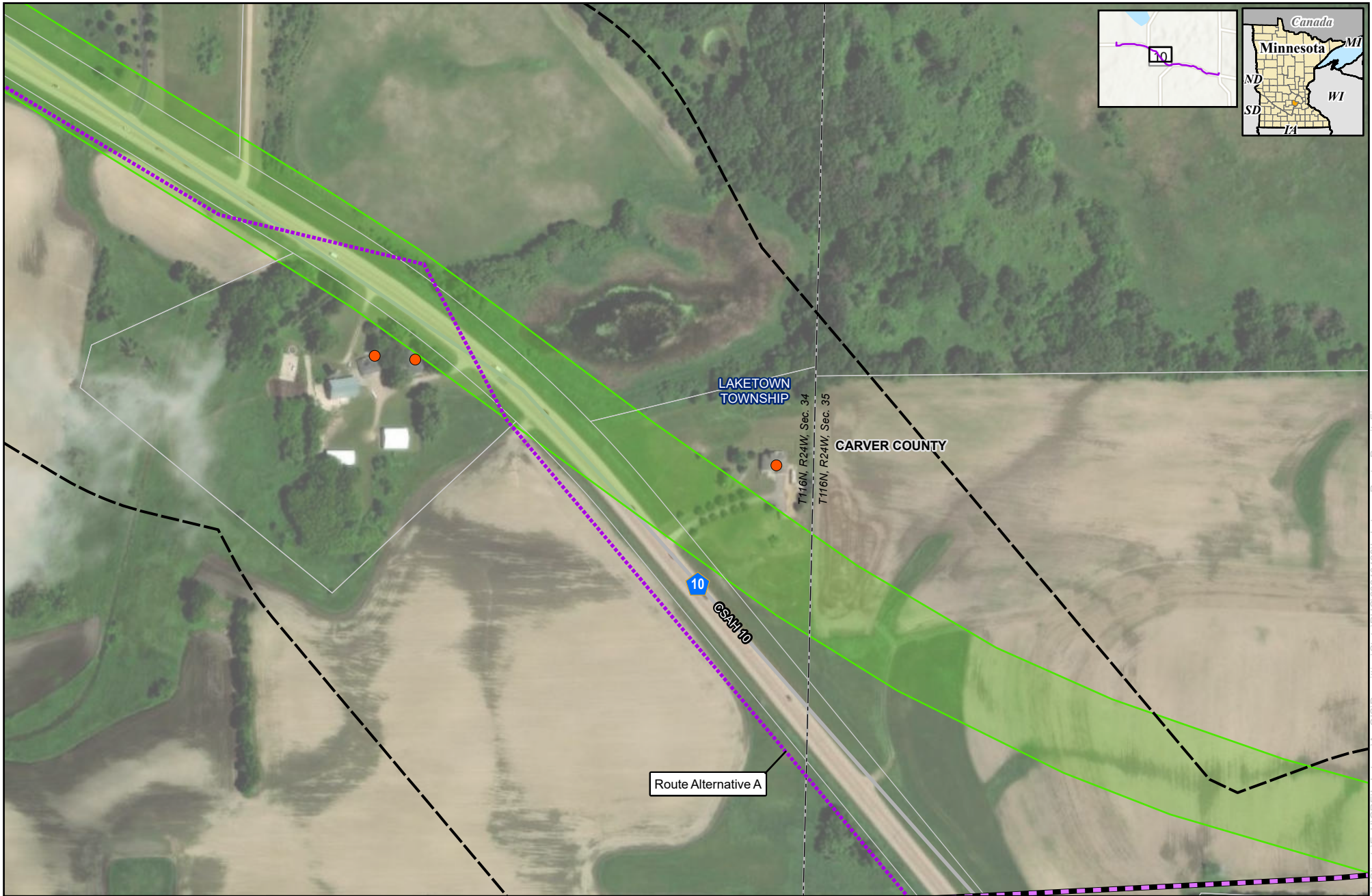


**Laketown 115-kV Transmission Line Project
Attachment 1
Carver County, Minnesota
Page 2 of 6**

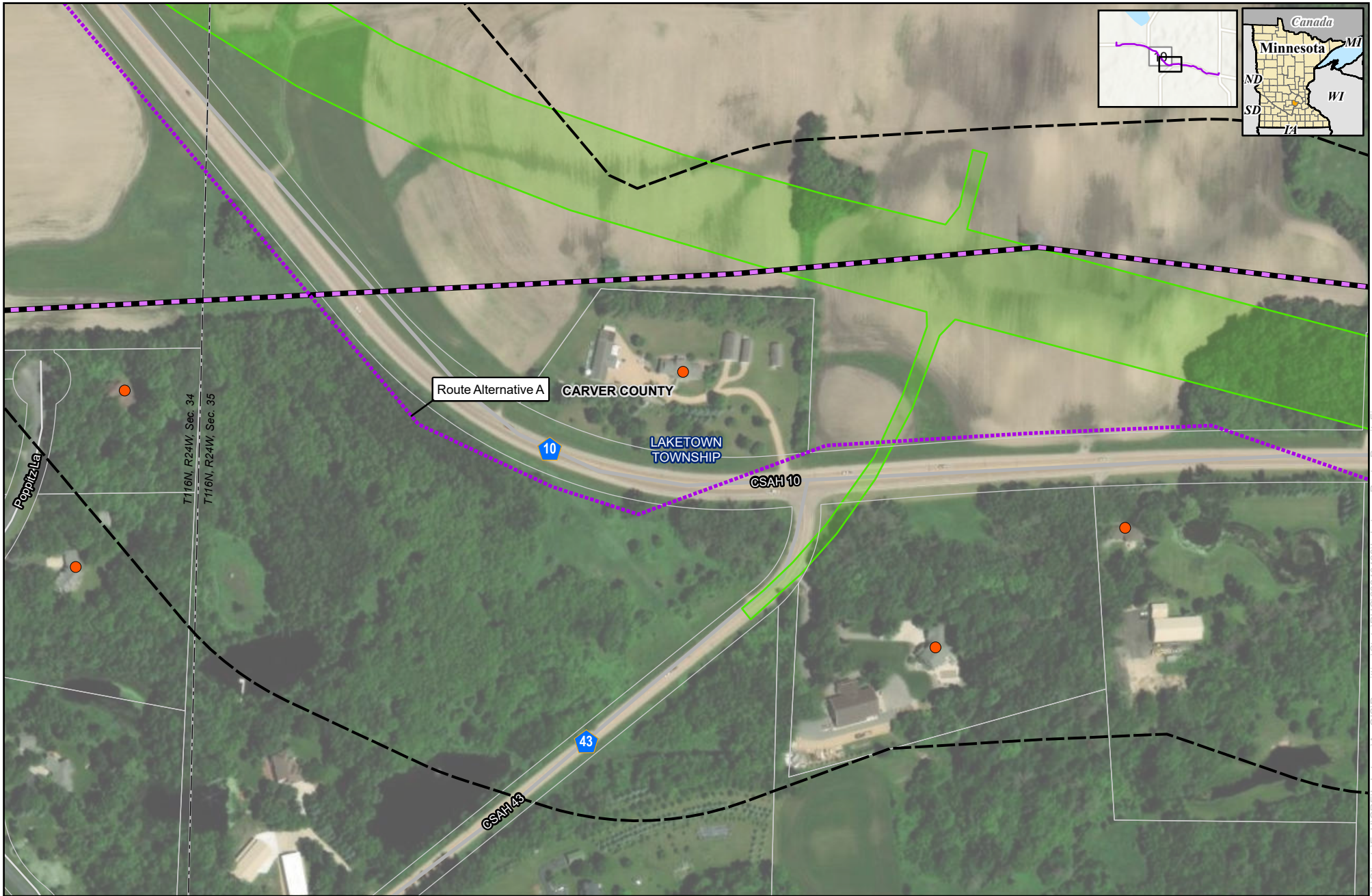
Route Alternative A
Route Width

Improvement: Highway 10
Western Subarea - West

Residence
Parcel Boundary
Section Boundary
Township Boundary
County Boundary



<p>0 150 300 Feet</p> <p>1 inch = 300 feet</p> <p>For Environmental Review Purposes Only</p>	<p>Laketown 115-kV Transmission Line Project</p> <p>Attachment 1</p> <p>Carver County, Minnesota</p> <p>Page 3 of 6</p>	<p>Route Alternative A</p> <p>Route Width</p>	<p>Non-GRE Transmission</p> <p>230-kV Transmission Line</p> <p>Improvement: Highway 10</p> <p>Western Subarea – West</p>	<p>Residence</p> <p>Parcel Boundary</p> <p>Section Boundary</p> <p>Township Boundary</p> <p>County Boundary</p>
--	---	---	--	---



0 150 300 Feet
1 inch = 300 feet

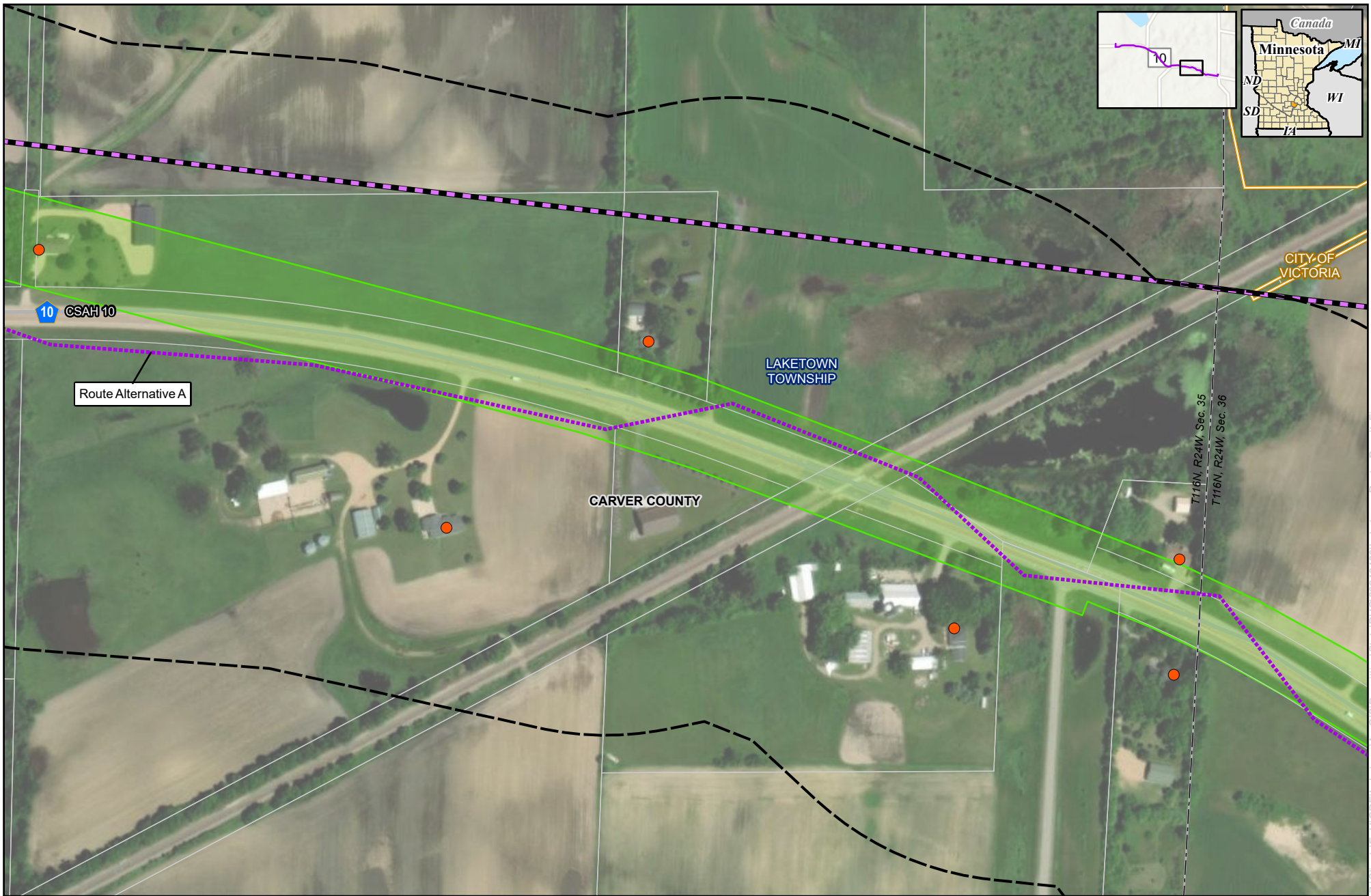


**Laketown 115-kV Transmission Line Project
Attachment 1
Carver County, Minnesota
Page 4 of 6**

Route Alternative A
Route Width

Non-GRE Transmission
230-kV Transmission Line
Improvement: Highway 10
Western Subarea – West

Residence
Parcel Boundary
Section Boundary
Township Boundary
County Boundary



<p>0 150 300 Feet</p> <p>1 inch = 300 feet</p> <p>For Environmental Review Purposes Only</p>	<p>Laketown 115-kV Transmission Line Project</p> <p>Attachment 1</p> <p>Carver County, Minnesota</p> <p>Page 5 of 6</p>	<p>Route Alternative A</p> <p>Route Width</p>	<p>Non-GRE Transmission</p> <p>230-kV Transmission Line</p> <p>Improvement: Highway 10 Western Subarea – West</p>	<p>Residence</p> <p>Parcel Boundary</p> <p>Section Boundary</p> <p>City Boundary</p> <p>Township Boundary</p> <p>County Boundary</p>
--	---	---	---	--

Source: Z:\Client\B_Laketown\GIS\Permitting\State\UC\2024\0429\Laketown_Route_Permit_Figures.aprx Date: (6/5/2025)



0 150 300 Feet
1 inch = 300 feet



Laketown 115-kV Transmission Line Project **Attachment 1** Carver County, Minnesota Page 6 of 6

Route Alternative A
Route Width
MV-VTT 115-kV Transmission Line

Non-GRE Transmission
115-kV Transmission Line
230-kV Transmission Line
Improvement: Highway 10
Western Subarea – West

Residence
Parcel Boundary
Section Boundary
City Boundary
Township Boundary
County Boundary



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

June 6, 2025

VIA E-MAIL & U.S. MAIL

Mayor Courtney Johnson
City of Carver
316 Broadway
Carver, MN 55315

Re: Proposed Laketown 115-kV Transmission Line & Substation

Dear Mayor Johnson:

As you know, Great River Energy and Minnesota Valley Electric Cooperative (MVEC) are proposing an approximately 4.3-mile 115-kilovolt (kV) transmission line and substation in Carver County, Minnesota (Project). I am writing in response to participation by City of Carver representatives' participation in the recent public hearings and comment period on the Project and the route proposed by Great River Energy (Proposed Route), to provide an update on the Project, and to hopefully resolve what may be some misunderstandings on the size, scope, and impacts of the Project.

We understand that City of Carver representatives have concerns regarding the potential impacts of the Proposed Route on land within Dahlgren Township that may be annexed into the City of Carver in the future—specifically, between Guernsey Avenue and County State Aid Highway (CSAH) 43. In particular, City representatives have: (1) questioned why the City was not involved earlier in the routing process; and (2) expressed concern about impacts on future development if the Proposed Route is permitted and constructed.

With respect to Great River Energy's engagement with the City of Carver, as you note, we were initially unaware of the annexation agreement with Dahlgren Township. We met with Dahlgren Township on July 8, 2024, as we met with other jurisdictions crossed by the Proposed Route and other route alternatives initially under consideration. The annexation agreement was not raised as part of that coordination. City of Carver representatives have expressed the belief that Great River Energy prioritized the City of Victoria over the City of Carver regarding coordination and routing, but I can assure you this is not the case. We were informed of the annexation agreement between Laketown Township and the City of Victoria in January 2024, we later met with the City of Victoria. Regardless of that coordination, our own independent analysis determined that there were approved development plans directly next to the existing 230-kV line in the City of Victoria that would render routing the Project there impossible without traveling directly over businesses; this would mean displacing the business. As you may have heard during the public hearings, that area has been annexed into the City of Victoria while these proceedings have been pending, and there is currently a Kwik Trip being constructed directly next to the existing 230-kV line and directly under where Route Alternative C would traverse. For 115-kV projects like this, we almost universally try to

avoid displacing homes and businesses. Consistent with that approach, then, we have not supported Route Alternative C because it would require displacing business(es).¹ Relatedly, however, the development that has sprung up around the existing 230-kV line highlights that residential, commercial, and industrial development often occurs in close proximity to transmission lines. Note, too, that the Project will be a lower-voltage line than the 230-kV line, and will be monopole structures rather than the lattice towers. A few pictures to compare are below.

Existing 230-kV Line



¹ For the same reason, we have not supported Route Alternative A along CSAH 10. As you may have heard during the public hearings, Carver County has future plans to widen and realign CSAH 10. If the Project were constructed along the current alignment of CSAH 10, there are more homes in close proximity to the Project, and the Project would likely need to be moved at the County's expense when the road project occurs. If the Project were constructed on what we think the future alignment of CSAH 10 may be, the Project would likely displace existing homes, assuming that the conceptual realignment and expansion is what ultimately gets constructed.

115-kV Structures

Left: Typical 115-kV structure Right: Typical 115-kV structure with distribution underbuild



As you know, since we learned of the annexation agreement between the City of Carver and Dahlgren Township, we have met and spoken with City officials on multiple occasions. Specifically, we met with City staff on November 1, 2024 during the environmental assessment scoping process and again on May 7, 2025 after the publication of the environmental assessment. We understand there may still be questions and concerns about the Project and the Proposed Route. We strongly believe that continued engagement will be helpful and informative to lessen the City's concerns, and my team is available to meet with City representatives individually and/or attend a City Council meeting at your convenience. Please let us know your preference.

In advance of further meetings, I would also like to provide some consolidated information regarding the Project. I understand that the Minnesota Public Utilities Commission permitting process can be dense, and hope that the information below could help resolve what may be misunderstandings regarding the size, scope, and potential impacts of the Project. The information below focuses on the Proposed Route between Guernsey Avenue and CSAH 43 in Dahlgren Township.

The Project is a 115-kV transmission line; 115-kV lines are the lowest voltage "high-voltage" lines in Minnesota, and they are common features throughout the state in both rural and urban areas. The Project will primarily use steel, direct-embedded monopoles (single structures) that will be approximately 70-95 feet above ground and 300-450 feet apart.

The Project will have a right-of-way of 100 feet (50 feet on either side of the structure). Where the Project parallels a road, the right-of-way on private land will typically be approximately 55 feet wide. That means that the approximately one-mile stretch of the Proposed Route that follows Hampshire Road will likely have approximately 55-feet of right-of-way on private land. Where there is an existing distribution line on Hampshire Road along the Proposed Route, the distribution will either be underbuilt or buried. I highlight this information to distinguish the right-of-way from the

“route width” that is much wider—the “route width” is part of the state’s review process, but the actual impacts of the Project will be far narrower.

Where the Proposed Route departs Hampshire Road, it follows property lines. We anticipate that the Project would be constructed relatively close to those property lines to limit agricultural impacts; on this Project, we have heard repeatedly from landowners in this area about their desire to continue agricultural uses and limit impacts to farming. Although we do generally prefer to follow existing roads and other rights-of-way where possible, sometimes that increases impacts. Here, we determined that continuing to follow Hampshire Road would, in fact, increase impacts, because of existing homes on Hampshire Road and where Hampshire Road and Augusta Road meet. The number one issue we hear from landowners is to increase proximity from homes. We take that feedback seriously for every project, and the Proposed Route attempts to do that.

As I understand it, the City of Carver’s primary concern regarding the Proposed Route is the potential to impact future development if that portion of Dahlgren Township is annexed into the City. We have reviewed both the City’s Comprehensive Plan, which includes Figure L-5 (titled Future Land Use) and the map dated August 2018 provided separately by the City of Carver. The City’s February 2020 Comprehensive Plan identifies the area between Guernsey Avenue and CSAH 43 as within its “2040 Ultimate Growth Boundary”, and the majority of the parcels crossed by the Proposed Route as classified as Agriculture; one parcel with an existing home is classified as Low Density Residential. Separately, the August 2018 map included in the City’s comments identifies the parcels crossed by the Proposed Route as low density residential, medium density residential, and commercial/industrial. It would be helpful to understand why there are differences between the two maps, and why the City’s comments highlight the earlier map, rather than the 2020 map publicly included in the Comprehensive Plan.

Regardless, however, the land uses identified in both maps are entirely consistent with a 115-kV line. Indeed, most land uses are consistent with a 115-kV line when there is orderly development, as the City contemplates here. As noted above, a 115-kV line has a smaller right-of-way than higher voltage lines, a more limited footprint, and is generally less visible on the landscape than higher voltage lines. Like other utilities, Great River Energy owns and operates 115-kV lines throughout the state, and we consistently see residential, commercial, and industrial development grow up around those lines. For example, we recently received a permit to rebuild a transmission line that goes through Burnsville, Eagan, and Apple Valley. Since the line was initially constructed, single-family residential development occurred in close proximity to the line, as did commercial development. We did not hear any concerns from city officials during that process about limiting development. We are happy to provide more detail about our experience on that project during a future meeting. Overall, based on our experience, the Proposed Route is not at all inconsistent with the City’s potential future plans for this area. In fact, the Project is intended to support the very development contemplated by the City and will directly serve MVEC members, including residents of the City of Carver and Dahlgren Township.

As I noted above, we strongly believe that continued engagement will be helpful and informative to lessen the City’s concerns. Great River Energy is available to meet with City representatives individually and/or attend a City Council meeting at your convenience. We look forward to hearing from you.

Sincerely,
GREAT RIVER ENERGY

A handwritten signature in black ink, appearing to read "Michael Swenson", written in a cursive style.

Michael Swenson
Transmission Permitting Specialist

cc: Brent Mareck, City of Carver City Manager
Erin Smith, City of Carver Community Development Director
Joe Green, Minnesota Valley Electric Cooperative

Photo 3-A: Guernsey Avenue, Southbound.
Great River Energy's existing 115-kV MV-VTT line is on the western edge of the road.



Photo 3-B. The intersection of Guernsey Avenue and Hampshire Road, facing west.



Photo 3-C. Hampshire Road, facing northwest, near the beginning of the Project.



Photo 3-D. Hampshire Road, facing northwest.



Photo 3-E. Hampshire Road, facing northwest.
The existing MVEC distribution line is alongside the north edge of the road.



Photo 3-F. Facing southwest along CSAH 11. View of the existing Xcel Energy 230-kV transmission line and the adjacent Kwik Trip development in active construction.



Photo 3-G. Facing west along CSAH 11. View of the existing Xcel Energy 230-kV transmission line and the adjacent Kwik Trip development in active construction.



Photo 3-H. Facing northwest along CSAH 11. View of the existing Xcel Energy 230-kV transmission line and the adjacent Kwik Trip development in active construction.



**In the Matter of the Application for a Route
Permit for a 115-kV Laketown Transmission
Line and Associated Facilities Project in Carver
County, Minnesota**

**OAH Docket No. 21-2500-40445
MPUC Docket No. ET-2/TL-24-132**

CERTIFICATE OF SERVICE

Breann L. Jurek certifies that on the 9th day of June 2025, she e-filed on behalf of Great River Energy and Minnesota Valley Electric Cooperative, a true and correct copy of their Post Hearing Comments with the Minnesota Public Utilities Commission via eDockets (www.edockets.state.mn.us). Said document was also served on the Official Service List of record on file with the Minnesota Public Utilities Commission and as attached hereto.

Executed on: June 9, 2025

Signed: /s/ Breann L. Jurek

Fredrikson & Byron, P.A.
60 South Sixth Street
Suite 1500
Minneapolis, MN 55402

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	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	Official CC Service List OAH
2	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		No	Official CC Service List OAH
3	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	Official CC Service List OAH
4	Jacques	Harvieux	jacques.harvieux@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 Saint Paul MN, 55101-2147 United States	Electronic Service		No	Official CC Service List OAH
5	Spencer	Howe	spencerh@mvec.net	Minnesota Valley Electric Cooperative		125 Minnesota Valley Electric Dr Jordan MN, 55352 United States	Electronic Service		No	Official CC Service List OAH
6	Breann	Jurek	bjurek@fredlaw.com	Fredrikson & Byron PA		60 S Sixth St Ste 1500 Minneapolis MN, 55402 United States	Electronic Service		No	Official CC Service List OAH
7	Molly	Leisen	mleisen@fredlaw.com	Fredrikson & Byron P.A.		60 South Sixth Street Suite 1500 Minneapolis MN, 55402 United States	Electronic Service		No	Official CC Service List OAH
8	Kimberly	Middendorf	kimberly.middendorf@state.mn.us		Office of Administrative Hearings	PO Box 64620 600 Robert St N Saint Paul MN, 55164-0620 United States	Electronic Service		Yes	Official CC Service List OAH
9	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	Official CC Service List OAH
10	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	Official CC Service List OAH
11	Michael	Swenson	mswenson@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	Official CC Service List OAH
12	Haley	Waller Pitts	hwallerpitts@fredlaw.com	Fredrikson & Byron, P.A.		60 S Sixth St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	Official CC Service List OAH