

January 26, 2026

**VIA E-FILING**

Ms. Sasha Bergman  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
Saint Paul, MN 55101-2147

**Re: In Matter of the Application of Big Bend Wind, LLC and Great River Energy for a Route Permit for a 161-kV high voltage transmission line and associated facilities in Martin County**

**MPUC Docket No. IP7013/TL-25-389**

Dear Ms. Bergman:

Big Bend Wind, LLC (Big Bend Wind) and Great River Energy (collectively, the Applicants) respectfully submit these reply comments in response to the oral comments offered during the Route Permit Application (Application) and Environmental Assessment (EA) Public Information Meetings and the written comments received during the public scoping comment period pursuant to the Minnesota Public Utilities Commission's (Commission) Notice of Comment Period dated December 30, 2025.<sup>1</sup>

Two individuals offered comments during the January 13, 2026, public information meeting regarding the proposed Transmission Line Extension Project in Martin County, Minnesota (Project). Mr. Bob Ewart expressed strong support for the Project.<sup>2</sup> Ms. Dana Scholl suggested a route segment alternative (the Scholl Alternative) to minimize aesthetic impacts to the Cedar Lutheran Cemetery (Cemetery).<sup>3</sup> The Scholl Alternative departs from the proposed route along 40<sup>th</sup> Avenue and heads west along the quarter section line between 230<sup>th</sup> and 240<sup>th</sup> Streets until it reaches the existing 345 kV transmission line, where it turns southwest following the existing transmission line right-of-way to the west side of County Road 103 (20<sup>th</sup> Avenue), turning south and following County Road 103 (20<sup>th</sup> Avenue), and returning back to the proposed route on the south side of 220<sup>th</sup> Street.

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<sup>1</sup> See PUC Notice of Complete Route Permit Application and Public Information Meetings (Dec. 30, 2025) (eDocket No. 202512-226288-01). Note: Big Bend Wind is submitting these comments concurrently with the scoping comment period ending on January 26, 2026, and has not had a chance to review all comments submitted through the end of the comment period.

<sup>2</sup> See Windom 6:00 p.m. Public Information Meeting Transcript (Windom 6:00 p.m. Tr.) at 26-27 (Jan. 13, 2026).

<sup>3</sup> Windom 6:00 p.m. Tr. at 23-24 (Jan. 13, 2026).

Big Bend Wind appreciates these comments and offers the following response to the Scholl Alternative.

Minn. Stat. § 216I.07, subd. 3(b), requires the Commission to prepare an addendum to the EA if Commission staff identifies other routes or potential impacts for review. The addendum must evaluate the human and environmental impacts of the alternative route and additional mitigation measures. Before accepting an alternative for study, the Commission typically evaluates whether the alternative is likely to have significant environmental benefit compared to the project as proposed, or if the environmental benefits are similar, whether the alternative would have substantially less adverse economic, employment, or sociological impacts.<sup>4</sup>

The EA studied aesthetic impacts. Page 35 stated:

Views of the transmission line will generally be screened at residences due to the existence of existing windbreaks and outbuildings, for example, sheds and barns. Nevertheless, the transmission line will be visible along township roads, in fields, and other locations within the Local Vicinity. Because there is other existing infrastructure within one mile of the Extension Project, including wind turbines and other transmission lines which are taller than the proposed Extension Project, potential impacts associated with the new transmission line are expected to be incremental and minimal.

Ms. Scholl's recommendation to move the route farther from the Cemetery to minimize aesthetic impacts on the Cemetery does not minimize human and environmental impacts from the Project and should not be accepted for study as a route alternative in an EA Addendum. Big Bend Wind already designed the Project to minimize impacts, including aesthetic impacts, in this area. There is existing vegetative screening abutting the Cemetery, running perpendicularly and parallel to 220<sup>th</sup> Street, that mitigates aesthetic impacts from the Project (see Figure 1). Additionally, Big Bend Wind has minimized the number of transmission structures in this area as an additional mitigation measure. The transmission structures will be placed next to road rights-of-ways, which already disrupt viewsheds.

Figure 1. Existing Vegetative Screening at the Cemetery

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<sup>4</sup> See, e.g., Minn. Stat. § 4410.2300(G) (providing a general standard for evaluating alternatives under the Minnesota Environmental Policy Act).



Additionally, Big Bend Wind minimized aesthetic impacts by choosing an Application Alignment<sup>5</sup> that follows road right-of-way, avoiding structure placement directly in front of residences, and minimizing damage to vegetation near the transmission line to the greatest extent possible. Given the location of the Cemetery adjacent to the road, locating the transmission line along the road would most likely have resulted in conductors overhanging burial sites. As such, Big Bend Wind worked with an adjacent landowner and developed the Application Alignment to avoid the Cedar Lutheran Church and Cemetery while keeping structure locations along field edges.

The 2025 Sample Route Permit contains conditions related to aesthetics in Section 5.3.7. These conditions include considering landowner input when placing structures and preserving the natural landscape to the extent possible by not unnecessarily destroying the natural surroundings. Additionally, transmission structures are required to be placed to minimize the loss of agricultural land, forests and wetlands, and to avoid homes and farmsteads, among other conditions. Many other provisions in the 2025 Sample Route Permit also indirectly mitigate aesthetic impacts. For example, Section 5.3.10 Vegetation Management requires the permittee to minimize the number of trees removed and to preserve windbreaks to the maximum extent practicable.<sup>6</sup>

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<sup>5</sup> Big Bend Wind has developed its "Application Alignment" within the Proposed Route to minimize the overall potential impacts of the transmission line based on the routing factors identified in Minn. Stat. § 216I.05, subd. 11. The Application Alignment is shown on the detailed maps in Appendix B of the Application. *See* Application and EA for a 161-Kv Transmission Line in Martin County, Minnesota at 18 and Appendix B (Dec. 19, 2025) (eDocket No. 202512-225711-02).

<sup>6</sup> *See generally* Sample Route Permit (Jan. 15, 2026) (eDocket No. 20261-226969-01).

The Scholl Alternative does not minimize impacts associated with the Project. Instead, the suggested alternative route shifts potential impacts onto landowners' parcels situated on the north side of 220<sup>th</sup> Street with whom Big Bend Wind does not have existing voluntary easement agreements. The suggested alternative route would require the Applicants to run the transmission along property lines north of 220<sup>th</sup> Street where a number of trees are currently planted. These trees would need to be removed to facilitate construction equipment access and ensure safe clearances between vegetation and the transmission line, increasing the aesthetic impacts of Project on those parcels. The Scholl Alternative would require the Applicants to offset the transmission line from property lines and further into agricultural fields where it would have greater impacts on agricultural operations. Neither of these options would achieve the goal of minimizing potential human and environmental impacts associated with the Project.

Additionally, the Scholl Alternative would parallel the existing 345-kV transmission line when heading southwest towards to the west side of County Road 103 (20<sup>th</sup> Avenue). As stated in the Application, Big Bend Wind considered an Alternative Route that parallels the existing 345-kV transmission line to maximize co-location with existing utility rights-of-way. This Alternative Route was dismissed for the following reasons: 1) it would require a 125-foot offset from the existing transmission line alignment requiring the Application Alignment to be further into agricultural fields at a staggered angle not conducive to agricultural equipment; 2) the new 161-kV transmission structures would be located at different span lengths than the existing 345-kV transmission structures, increasing the impact on farming operations; 3) it would require additional travel along the right-of-way due to its location in agricultural fields and away from road right-of-way; 4) Big Bend Wind was unable to acquire voluntary easements from private landowners given the increased impacts on agricultural operations, and 5) routing the Project on the south side of the 345-kV transmission line would put the Extension Project too close to existing residences (within 200 feet of farmsteads and not across a road) and too close to existing and operating wind turbines (within 500 feet and 1.1 times tip height).<sup>7</sup> For these same reasons, the Scholl Alternative should be rejected.

Construction and operation of the Project as proposed will have minimal, incremental impacts. As proposed, the Scholl Alternative will not provide significant environmental benefit as compared to the Project, as it simply shifts the impacts away from the Cemetery onto other parcels where additional tree clearing would likely be necessary. Lastly, the Scholl Alternative would create a larger impact to agricultural land and operations. As such, the Applicants respectfully request that the Commission find that an EA Addendum is not necessary for the Project.

These comments have been electronically filed today through [www.edockets.state.mn.us](http://www.edockets.state.mn.us). A copy of this filing is also being served upon the persons on the Official Service Lists of record. Please let me know if you have any questions regarding this filing.

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<sup>7</sup> Application at 27 (Dec. 10, 2026) (eDocket No. 202512-225711-02).

Ms. Sasha Bergman  
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Sincerely,

FREDRIKSON & BYRON, P.A.

A handwritten signature in black ink, appearing to read 'CKB' followed by a long horizontal flourish.

Christina K. Brusven  
**Direct Dial:** (612) 492-7412  
**Email:** [cbrusven@fredlaw.com](mailto:cbrusven@fredlaw.com)

**In Matter of the Application of Big Bend Wind, LLC and Great River Energy for a Route Permit for a 161-kV high voltage transmission line and associated facilities in Martin County**

**MPUC Docket No. IP7013/TL-25-389**

***CERTIFICATE OF SERVICE***

Maia Martinez certifies that on the 26th day of January, 2026, she e-filed true and correct copy of scoping comments on behalf of Big Bend Wind, LLC and Great River Energy via eDockets ([www.edockets.state.mn.us](http://www.edockets.state.mn.us)).

Said document was also served as designated on the Official Service Lists on file with the Minnesota Public Utilities Commission and as attached hereto.

Executed on: January 26, 2026

*Signed: /s/ Maia Martinez*

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Fredrikson & Byron, P.A.

60 South Sixth Street

Suite 1500

Minneapolis, MN 55402

| <b>First # Name</b> | <b>Last Name</b>               | <b>Email</b>                         | <b>Organization</b>     | <b>Agency</b>   | <b>Address</b>   | <b>Delivery Method</b> | <b>Alternate Delivery Method</b> | <b>View Trade Secret</b> | <b>Service List Name</b> |
|---------------------|--------------------------------|--------------------------------------|-------------------------|---|--|------------------------|----------------------------------|--------------------------|--------------------------|
| 1 Brie              | Anderson                       | brie.anderson@apexcleanenergy.com    | Apex Clean Energy, Inc. |   | 8665 Hudson Boulevard North, Suite 200 Lake Elmo MN, 55402 United States | Electronic Service     |                                  | No                       | TL-25-389                |
| 2 Sasha             | Bergman                        | sasha.bergman@state.mn.us            |                         | Public Utilities Commission                                     | 121 7th PI E Ste 350 St. Paul MN, 55101 United States                    | Electronic Service     |                                  | Yes                      | TL-25-389                |
| 3 Christina         | Brusven                        | cbrusven@fredlaw.com                 | Fredrikson Byron        |   | 60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States            | Electronic Service     |                                  | Yes                      | TL-25-389                |
| 4 Mike              | Bull                           | mike.bull@state.mn.us                |                         | Public Utilities Commission                                     | 121 7th Place East, Suite 350 St. Paul MN, 55101 United States           | Electronic Service     |                                  | Yes                      | TL-25-389                |
| 5 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     |                                  | Yes                      | TL-25-389                |
| 6 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                       | TL-25-389                |
| 7 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     |                                  | Yes                      | TL-25-389                |
| 8 Mark              | Strohfus                       | mstrohfus@greenergy.com              | Great River Energy      |   | 12300 Elm Creek Blvd Maple Grove MN, 55369 United States                 | Electronic Service     |                                  | No                       | TL-25-389                |