

October 16, 2025

VIA E-FILING

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

**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**

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

Dear Ms. Bergman:

On October 2, 2025, the Minnesota Public Utilities Commission issued its Order Adopting Administrative Law Judge Report as Modified, Requiring Additional Record Development, and Remanding for Further Proceedings (Order) in the above-referenced matter. In accordance with Paragraph 4 of the Order, Great River Energy proposes to retain POWER Engineers to prepare a report consistent with the enclosed scope, to be submitted directly to the Executive Secretary and the Administrative Law Judge. Great River Energy respectfully requests the Executive Secretary's approval of the selection of POWER and the proposed scope.

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



3900 S. WADSWORTH BLVD. LAKEWOOD, CO 80235 | 303-716-8900
WWW.POWERENG.COM

October 10, 2025

Patrick Ludwig
Manager, Supply Management Services
Great River Energy
12300 Elm Creek Blvd | Maple Grove, MN 55369-4718

Dear Patrick,

Thank you for the opportunity to present a proposal from POWER Engineers (POWER) for an independent review of the 115 kV Laketown Transmission Line reliability assessment of the considered options under MPUC Docket No. ET2/TL-24-132. POWER understands that the MPUC would like an independent assessment of the reliability considerations and cost estimates for the Proposed Route and Route Alternative B under consideration. Given the schedule and the scope of work, POWER proposes to provide an impartial and independent review of the study results and materials from Great River Energy (GRE) to provide its own conclusions on the relative impact to reliability from each of the options under consideration along with estimates costs for alternative route options.

RFP DOCUMENTS FOR THIS WORK PLAN

This work plan is based on information received from Great River Energy and the following documents related to:

- » GRE - PUC - Route Option RFP
- » Appendix C - GRE Reliability Review

CONTRACT TERMS & CONDITIONS

POWER proposes to execute a new Professional Services Agreement, between POWER Engineers, Inc. and Great River Energy to be negotiated and executed following submittal of this proposal. Execution of this work is intended to be completed based on Time and Materials with an estimated cost and our pricing provided in this proposal is dependent on Terms and Conditions that align with "Exhibit A - 2025 PEI Schedule of Charges" utilized to derive budget for this proposal.

Attachments as follows:

- » Exhibit A - 2025 PEI Schedule of Charges

PROJECT UNDERSTANDING

The understanding of the scope of the project between what is written in the RFP and what was discussed during the Q&A session is as follows:

POWER will work with GRE to obtain copies of the study reports, model case files, and analysis setups used by GRE for the reliability assessment. Descriptions of the alternative routes in addition to the original route will be provided. From these, POWER will review the study report, check the modeling results, and assess independently whether POWER agrees with all conclusions and recommendations or whether alternative considerations and/or conclusions could be made. A report summarizing these findings will be provided to the MPUC to support the request by MPUC for an independent review. A report summarizing cost assumptions will be provided to the MPUC to support the request by MPUC for an independent review.

PROJECT WORK PLAN

Task 0 Project Management and Administration

POWER has included project management and administration time for managing the project, interfacing with the GRE team, and associated work.

Task 1 Data Collection and Review

POWER will work with GRE to obtain copies of the modeling case files, all analysis setups, and study reports. These will be reviewed by POWER and compared to each route options.

Task 2 Independent Review and Report

POWER will provide a report documenting the review of the GRE reliability assessment of the 115 kV Laketown Transmission line. Key impacts to reliability will be noted. POWER will make new recommendations if appropriate and state whether it agrees with the original recommendations from GRE. This report will be intended for public use and for submission to the MPUC. In addition, POWER will be available to support one (1) virtual meeting with the MPUC to discuss the report if requested.

Task 3 Transmission & Substation Estimates Creation and Report

POWER to develop an estimate for transmission line costs for Proposed Route and Route Alternative B identified and a cost estimate for the greenfield breaker station alone using POWER internal tools and costs library. POWER internal 115 kV project would be used for reference unless otherwise directed.

Develop an estimate for a three terminal 115 kV ring bus using POWER internal tools and costs library. POWER internal 115 kV project would be used for reference unless otherwise directed.

Create a final report including estimates into one document overviewing what would be required for Alternative Route options.

Assumption(s):

- Detailed descriptions of each route option will be provided to POWER.
- POWER estimate templates will be utilized unless directed otherwise.
- Transmission line and substation standards, key considerations, and reliability requirements used by GRE will be provided to POWER.
- GRE will provide their full analysis setups, and all supporting files needed for POWER to effectively replicate and analyze the report results and recommendations.

Deliverable(s):

- Provide a cost-per-mile comparison of the two routes
- Cost estimate for greenfield 115kV breaker station
- Reliability Study Review & Estimate Report
- One (1) virtual meeting with MPUC if needed to review the report

SCHEDULE

The schedule for deliverables described in the work plan will be as timely as possible to meet the needs of GRE and MPUC's request.

BUDGET

POWER developed the below proposal budget based on our understanding of this project's scope of work and our experience with similar projects. The table, broken down by work order as requested, summarizes the budget for services to be provided on a Time and Materials with an estimated cost of \$78,360.00. This proposal is valid for 30 days.

We have included our rate sheet, for reference:

- Exhibit A - 2025 PEI Schedule of Charges.

BUDGET ESTIMATE		
#	Task	BUDGET
0	<i>Project Management</i>	\$2,840.00
1	<i>Data Collection and Review</i>	\$10,680.00
2	<i>Independent Review and Report</i>	\$24,920.00
3	<i>Facility Estimates and Report</i>	\$39,920.00
	<i>Total</i>	\$78,360.00

We appreciate the opportunity to support this important project. If you have any questions, please contact me at (218) 770-4884 or paul.hennen@powereng.com.

Sincerely,



Paul Hennen, PMP
Project Manager

**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.**

CERTIFICATE OF SERVICE

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

Maia Martinez certifies that on the 16th day of October, she e-filed on behalf of Great River Energy and Minnesota Valley Electric Cooperative, a true and correct copy of this filing 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: October 16, 2025

Signed: /s/ Maia Martinez

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	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission		Electronic Service		No	Official CC Service List OAH
3	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	Official CC Service List OAH
4	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
5	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
6	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
7	Logan	Hicks	logan.m.hicks@state.mn.us		Department of Commerce	85 7th Place East Suite 280 Saint Paul MN, 55101 United States	Electronic Service		No	Official CC Service List OAH
8	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
9	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
10	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
11	Sam	Lobby	sam.lobby@state.mn.us		Public Utilities Commission	350 Metro Square Building 121 7th Place East St. Paul MN, 55101 United States	Electronic Service		No	Official CC Service List OAH
12	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
13	Generic Notice	Residential Utilities	residential.utilities@ag.state.mn.us		Office of the Attorney	1400 BRM Tower	Electronic Service		No	Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
		Division			General - Residential Utilities Division	445 Minnesota St St. Paul MN, 55101-2131 United States				OAH
14	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
15	Michael	Swenson	mswenson@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	Official CC Service List OAH
16	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