

November 7, 2024

VIA E-FILING

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

**Re: 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
MPUC Docket No. ET-2/TL-23-410**

Dear Mr. Seuffert:

Great River Energy respectfully submits these comments regarding the Administrative Law Judge's Findings of Fact, Conclusions of Law, and Recommendations ("Report"). The Report recommends that the Minnesota Public Utilities Commission ("Commission") grant a route permit for the Pilot Knob to Burnsville Rebuild and Upgrade Project ("Project"), with certain conditions. Great River Energy appreciates the Administrative Law Judge's thorough review of the record and recommendation to grant a route permit for the Project.

Great River Energy provides one clarification regarding the Report's description of the proposed conductors to be used for the Project. Specifically, Great River Energy requests that Paragraph 57 of the Report be revised to include the underlined language below:

Single circuit structures would have three phases of bundled conductor wires and one shield wire. Double circuit structures would have six phases of bundled conductor wires and up to two shield wires. It is anticipated that the phase wires would be 795 thousand circular mil aluminum-clad steel supported (795 ACSS) or a conductor with similar capacity.¹

This revision is consistent with the record and the Report, in that the Report elsewhere recommended incorporating Great River Energy's revisions to Section 2.2 of the Draft Route Permit, which included the text above.²

¹ See Great River Energy's Comments on EA and Draft Site Permit, Attachment A-2 at 2 (Sept. 3, 2024) (eDocket No. 20249-209943-01); see also Great River Energy's Proposed Findings of Fact, Conclusions of Law, and Recommendations at ¶ 58 (Sept. 10, 2024) (eDocket No. 20249-210094-01).

² See Report at ¶ 185.

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Separately, with respect to proposed permit conditions, the Report generally recommends that the Commission include the permit conditions proposed by Great River Energy and further revised by the Department of Commerce, Energy Environmental Review and Analysis (“EERA”). Great River Energy appreciates EERA’s coordination regarding the proposed permit conditions and respectfully submits that the proposed conditions identified in the Report resulting from that coordination are workable and avoid and minimize potential Project impacts.

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

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**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**

**MPUC Docket No. ET-2/TL-23-410
OAH Docket No. 5-2500-39898**

CERTIFICATE OF SERVICE

Breann L. Jurek certifies that on the 7th day of November, 2024, she e-filed a true and correct copy of the following documents on behalf of Great River Energy via eDockets (www.edockets.state.mn.us):

1. Exceptions to the Administrative Law Judge Report; and
2. Certificate of Service.

Said documents were also served as designated on the Official Service List on file with the Minnesota Public Utilities Commission and as attached hereto.

Executed on: November 7, 2024

Signed: /s/ Breann L. Jurek

Breann L. Jurek
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Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	SPL_SL_23-410_23-410
Brock	FLUEGGE	brock@lakesideins.com	Lakeside Insurance Brokers	11979 County Rd 11 Ste 270 Burnsville, MN 55337	Electronic Service	No	SPL_SL_23-410_23-410
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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 55101-2131	Electronic Service	Yes	SPL_SL_23-410_23-410
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