

December 30, 2025

VIA EFILING

Sasha Bergman
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint 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**

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

Dear Ms. Bergman:

Great River Energy submits the attached Supplemental Proposed Findings of Fact, Conclusions of Law, and Recommendations in the above-referenced docket. A copy of this filing is also being served as designated on the Official Service List on file with the Minnesota Public Utilities Commission.

Please let me know if you have any questions regarding this filing.

Sincerely,

FREDRIKSON & BYRON, P.A.

/s/ Haley L. Waller Pitts

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**STATE OF MINNESOTA
OFFICE OF ADMINISTRATIVE HEARINGS
FOR THE PUBLIC UTILITIES COMMISSION**

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

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**GREAT RIVER ENERGY'S
SUPPLEMENTAL PROPOSED
FINDINGS OF FACT, CONCLUSIONS
OF LAW, AND RECOMMENDATIONS**

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**In the Matter of the Application of Great
River Energy for a Route
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kV Transmission Line in Carver County,
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**GREAT RIVER ENERGY'S
SUPPLEMENTAL PROPOSED
FINDINGS OF FACT, CONCLUSIONS
OF LAW, AND RECOMMENDATIONS**

This matter was previously assigned to Administrative Law Judge Kimberly Middendorf to conduct a public hearing and prepare findings of fact and conclusions of law on the Route Permit Application (MPUC Docket No. ET2/TL-24-132) (Application) of Great River Energy and Minnesota Valley Electric Cooperative (MVEC) (together, the Applicants) to build a new 115-kilovolt (kV) double-circuit high voltage transmission line (HVTL) (Transmission Line) and new MVEC substation (the Laketown Substation) in Laketown and Dahlgren Townships in Carver County, Minnesota, referred to as the Laketown 115-kV Transmission Line Project (Project).

Public hearings on the Application were held on May 21, 2025 (in-person) and May 22, 2025 (remote-access). The factual record remained open until June 2, 2025, for the receipt of written public comments. On July 17, 2025, the Administrative Law Judge issued Findings of Fact, Conclusions of Law, and Recommendations (Report), and, on September 4, 2025, the matter came before the Minnesota Public Utilities Commission (Commission). In its October 2, 2025, Order adopting Administrative Law Judge Report as Modified, Requiring Additional Record Development, and Remanding for Further Proceedings (the October 2025 Order), the Commission adopted the Administrative Law Judge's Report as modified (Commission-Adopted Report), and remanded the matter to the Court of Administrative Hearings to set the schedule and procedure for further record development and to issue findings, conclusions, and recommendations focused on comparison of the Applicants' Proposed Route and Route Alternative B.

These Supplemental Findings of Fact, Conclusions of Law, and Recommendations (Supplemental Report) are intended to supplement the Commission-Adopted Report to reflect the record further developed in this proceeding since the issuance of the Commission's October 2025 Order and is limited to those topics identified in the Commission's November 17, 2025, Notice of Comment Period.

SUMMARY OF RECOMMENDATIONS

The Administrative Law Judge recommends that the Commission grant a route permit for Route Alternative B, and further recommends that the Route Permit reflects an alignment of Route Alternative B on the north side of Augusta Road.

Based on the evidence in the hearing record, the Administrative Law Judge makes the following:

FINDINGS OF FACT

I. APPLICANTS

1. Great River Energy is a not-for-profit wholesale electric power cooperative based in Maple Grove, Minnesota. Great River Energy provides electricity and related services to approximately 1.7 million people through its 27 member-owner cooperatives and customers. Through its member-owners, including MVEC, Great River Energy serves two-thirds of Minnesota and parts of Wisconsin.¹

2. MVEC is the distribution cooperative serving the area in which the Project will be located. It is one of Great River Energy's transmission customers, and it will be the owner of the proposed Laketown Substation. MVEC provides electric service to a 968-square-mile service area which includes all or parts of nine Minnesota counties: Blue Earth, Carver, Dakota, Hennepin, Le Sueur, Rice, Scott, Sibley, and Waseca. MVEC does not generate power; rather, MVEC delivers electric energy supplied and transmitted by Great River Energy to their substations. MVEC then distributes that energy to homes and businesses through their distribution system.²

II. SUPPLEMENTAL PROCEDURAL HISTORY

3. On October 2, 2025, the Commission issued the October 2025 Order, which remanded this matter to the Court of Administrative Hearings to set the schedule and procedure for further record development and to issue findings, conclusions, and recommendations focused on comparison of the Applicants' Proposed Route and Route Alternative B by obtaining:

- a. Greater detail on the reliability concerns associated with Route Alternative B as compared to the Applicants' Proposed Route, the steps necessary to address the reliability concerns, and a more detailed description of the cost differential of achieving a similar level of reliability of the two route options;
- b. The Applicants' response to the reliability and cost report of the independent consultant;
- c. Comments from Xcel Energy regarding any concerns about the reliability and cost of Route Alternative B;
- d. A reliability and cost analysis of moving the proposed alignment for Route Alternative B to the north side of Augusta Road on the existing distribution right-of-way with the distribution line either collocated on the project structures or buried; and
- e. Further input from local units of government and landowners who own property within the proposed route width of either route to provide any additional comments on any of the routing factors,

¹ Ex. APP-2 at 1-1 (Application).

² Ex. APP-2 at 1-1 (Application).

including reliability requirements and cost estimates, as well as possible realignment of Route Alternative B to the north side of Augusta Road, to allow for a better side-by-side comparison.

4. On October 10, 2025, the Administrative Law Judge issued a Notice of and Order for Prehearing Conference³ and an Amended Notice of and Order for Prehearing Conference.⁴ The Amended Notice set a prehearing conference for October 22, 2025.

5. On October 16, 2025, the Applicants filed an independent engineer and scope of review proposal in accordance with Paragraph 4 of the October 2025 Order.⁵

6. On October 20, 2025, the Commission Executive Secretary filed a letter approving POWER Engineers, the proposed independent engineer, to conduct an independent review of the Project in accordance with Paragraph 4 of the October 2025 Order.⁶

7. On October 22, 2025, the Administrative Law Judge issued a Third Prehearing Order.⁷

8. On October 28, 2025, Commission Energy Infrastructure Permitting (EIP) staff, formerly known as EERA, filed a Supplemental Appendix C to the Environmental Assessment (EA).⁸

9. Also on October 28, 2025, EIP staff filed a notification of mailing of Supplemental Appendix C to the EA to the Carver County Library.⁹

10. On October 30, 2025, the Commission issued minutes from the September 4, 2025, Commission meeting.¹⁰

11. On November 4, 2025, Shaddix & Associates filed a transcript from the prehearing conference held on October 22, 2025.¹¹

³ Notice of and Order for Prehearing Conference (Oct. 10, 2025) (eDocket No. [202510-223769-01](#)).

⁴ Amended Notice of and Order for Prehearing Conference (Oct. 10, 2025) (eDocket No. [202510-223811-01](#)).

⁵ Proposed Independent Review and Scope (Oct. 16, 2025) (eDocket No. [202510-224008-01](#)).

⁶ Commission Letter Approving Independent Engineer and Scope (Oct. 20, 2025) (eDocket No. [202510-224111-01](#)).

⁷ Third Prehearing Order (Oct. 22, 2025) (eDocket No. [202510-224203-01](#)).

⁸ EA Supplemental Appendix C (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)).

⁹ Notification of EA Supplemental Appendix C to Library (Oct. 28, 2025) (eDocket No. [202510-224363-01](#)).

¹⁰ Minutes – September 4, 2025 Commission Meeting (Oct. 30, 2025) (eDocket No. [202510-224454-01](#)).

¹¹ Prehearing Transcript held on October 22, 2025 (Nov. 4, 2025) (eDocket No. 202511-224632-01).

12. On November 10, 2025, POWER Engineers filed its Independent Review (Independent Report).¹²

13. On November 17, 2025, the Commission issued a Notice of Comment Period, requesting initial comments by December 16, 2025, and reply comments by December 23, 2025.¹³

14. On December 8, 2025, the City of Victoria submitted a written comment.¹⁴

15. On December 15, 2025, Northern States Power Company d/b/a Xcel Energy (Xcel Energy) submitted a written comment.¹⁵

16. Also on December 15, 2025, EIP staff filed a comment received from the United States Fish and Wildlife Service (USFWS).¹⁶

17. On December 16, 2025, EIP staff filed a batch of nine comments received from members of the public.¹⁷

18. Also on December 16, 2025, the Applicants submitted initial comments.

19. On December 17, 2025, EIP staff filed additional public comments received from the City of Carver, Russell Schlegelmilch, Jo Eiden, Anthony Schuster, Patty Eiden, and Greg Boe.¹⁸

20. On December 18, 2025, EIP staff filed additional public comment from Don Schlegelmilch.¹⁹

21. On December 23, 2025, MVEC submitted reply comments in support of Route Alternative B.²⁰

¹² POWER Engineers Independent Review (Nov. 10, 2025) (eDocket No. [202511-224791-01](#)).

¹³ Notice of Comment Period on Independent Consultant Report and for Additional Record Development (Nov. 17, 2025) (eDocket No. [202511-224978-01](#)).

¹⁴ City of Victoria Comment (Dec. 8, 2025) (eDocket No. [202512-225603-01](#)).

¹⁵ Xcel Energy Comments (Dec. 15, 2025) (eDocket No. [202512-225858-01](#)). These comments reference a switch structure. For purposes of clarity, an in- and out-configuration is currently planned, regardless of route selected.

¹⁶ USFWS Comments (Dec. 15, 2025) (eDocket No. [202512-225823-01](#)).

¹⁷ Public Comments Batch 1 (Dec. 16, 2025) (eDocket No. [202512-225923-01](#)).

¹⁸ City of Carver Comments (Dec. 17, 2025) (eDocket No. [202512-225951-01](#)); Russell Schlegelmilch Comment (Dec. 17, 2025) (eDocket No. [202512-225936-01](#)); Jo Eiden Comment (Dec. 17, 2025) (eDocket No. [202512-225940-01](#)); Anthony Schuster Comment (Dec. 17, 2025) (eDocket No. [202512-225949-01](#)); Patty Eiden Comment (Dec. 17, 2025) (eDocket No. [202512-225950-01](#)); Greg Boe Comment (Dec. 17, 2025) (eDocket No. [202512-225952-01](#)).

¹⁹ Don Schlegelmilch Comment (Dec. 18, 2025) (eDocket No. [202512-225996-01](#)).

²⁰ MVEC Reply Comments (Dec. 23, 2025) (eDocket No. [202512-226136-01](#)).

22. Also on December 23, 2025, Great River Energy submitted reply comments in support of Route Alternative B.²¹

23. On December 30, 2025, Great River Energy filed supplemental proposed findings of fact, conclusions of law, and recommendations.

III. DESCRIPTION OF THE PROJECT

24. The Commission-Adopted Report contains a description of the Project, the Proposed Route, and Route Alternative B.²² This Supplemental Report does not repeat those findings, which are incorporated herein by reference. The scope of the Project did not change during the Supplemental Comment Period.

IV. NEED OVERVIEW

25. The Project is needed to provide electric energy to the new Laketown Substation. The Laketown Substation will provide service to end users within MVEC's service territory. The Project is needed to provide reliable electrical service to current and future end-use customers in the rapidly growing area near the Project. The ability to operate at the 115-kV voltage will ensure there is sufficient electrical capability to serve increased electrical demand in the future.²³

26. Because of the voltage (115kV) and length (less than 10 miles) of the Project, a Certificate of Need is not required for the Project.²⁴

V. ROUTES EVALUATED IN SUPPLEMENTAL PROCESS

27. The Commission-Adopted Report discusses the Applicants' route development and evaluation process, including its coordination and outreach with stakeholders, local government units, and landowners.²⁵ This Supplemental Report is limited to record developed during the supplemental process with respect to the Proposed Route and Route Alternative B.

A. Proposed Route.

28. The Commission-Adopted Report provides a description of the Proposed Route.²⁶ The Proposed Route did not change during the Supplemental Comment Period.

29. As described in Supplemental Appendix C to the EA, the Proposed Route was developed in an effort to serve today's users and while also being well-positioned to serve future load growth. In identifying the Proposed Route for the Project, Great River Energy considered how a route would relate to the rest of the existing system, and ultimately proposed a route that would enhance overall local system reliability (minimizing loss of load) with a bus-tie breaker

²¹ Great River Energy Reply Comments (Dec. 23, 2025) (eDocket No. [202512-226177-01](#)).

²² Commission-Adopted Report at ¶¶ 62-70.

²³ Commission-Adopted Report at ¶ 71.

²⁴ Commission-Adopted Report at ¶ 72.

²⁵ Commission-Adopted Report at ¶¶ 73-83.

²⁶ Commission-Adopted Report at ¶ 75.

within the proposed Laketown Substation. The Proposed Route offers reliability benefits because it minimizes the impact of outages to end user and more evenly splits local load.²⁷

30. In the Independent Report, POWER Engineers determined that the Proposed Route more evenly segments the load along the existing 115 kV W. Waconia – Scott County transmission line and allows for a circuit breaker to be placed strategically near a central location of the line, which is a cost-effective, sustainable solution which would alleviate the need for greenfield breaker station in the future. The Proposed Route also allows for more options to restore customers through back feeding in the event of an outage, lessening outage durations.²⁸

B. Route Alternative B.

31. The Commission-Adopted Report provides a description of Route Alternative B.²⁹ The October 2025 Order also requested analysis of moving the alignment for Route Alternative B to the north side of Augusta Road.

32. Route Alternative B would meet the need for the Project and serve MVEC's load in the local area. However, Route Alternative B lacks the increased reliability benefits that the Proposed Route offers. As described in Supplemental Appendix C to the EA, Route Alternative B serves today's users, but future system modifications not proposed as part of this Project would be needed if and as load growth continues in this area. This would include the construction and development of a greenfield breaker station at some point in the future. The greenfield breaker station would likely be built on a 20-acre site, and would be built at a location that divides the system into three separate circuits, significantly reducing exposure.³⁰

33. Comments submitted by members of the public during the Supplemental Comment Period expressed near universal support for Route Alternative B, primarily focused on its higher percentage of right-of-way sharing and increased distance from the City of Carver.³¹

34. After review of the comments filed during the initial comment period, both Applicants submitted reply comments that expressed support for Route Alternative B.³²

²⁷ EA Supplemental Appendix C at 2 (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)).

²⁸ POWER Engineers Independent Review at 2-4 (Nov. 10, 2025) (eDocket No. [202511-224791-01](#)).

²⁹ Commission-Adopted Report at ¶¶ 76-83.

³⁰ EA Supplemental Appendix C at 2 (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)).

³¹ *See, e.g.*, City of Carver Comments (Dec. 17, 2025) (eDocket No. [202512-225951-01](#)); Public Comments Batch 1 (Dec. 16, 2025) (eDocket No. [202512-225923-01](#)); Russell Schlegelmilch Comment (Dec. 17, 2025) (eDocket No. [202512-225936-01](#)); Anthony Schuster Comment (Dec. 17, 2025) (eDocket No. [202512-225949-01](#)); Greg Boe Comment (Dec. 17, 2025) (eDocket No. [202512-225952-01](#)); Don Schlegelmilch Comment (Dec. 18, 2025) (eDocket No. [202512-225996-01](#)).

³² MVEC Reply Comments (Dec. 23, 2025) (eDocket No. [202512-226136-01](#)); Great River Energy Reply Comments (Dec. 23, 2025) (eDocket No. [202512-226177-01](#)).

VI. PROJECT SCHEDULE

35. The Applicants anticipate starting construction on the Laketown Substation in spring 2027 and on the Transmission Line in fall 2027 and energizing the Project in the summer of 2028.³³

36. The Project schedule is driven by the delivery of the substation transformer, which is scheduled for August 2027. Substation site preparation work, such as substation grading, needs to be commenced in Spring 2027 to accommodate and prepare for that delivery. Delays to the Project schedule could impact the Project's ability to meet the critical need in the Project area.³⁴

VII. PROJECT COSTS

37. Applicants estimate that the Project, if constructed on the Proposed Route, will cost approximately \$17,965,000. Of that cost, the Transmission Line will cost approximately \$11,043,500; the Great River Energy transmission substation infrastructure will cost approximately \$2,861,500; and the Laketown Substation will cost approximately \$4,060,000.³⁵

38. Route Alternative B is estimated to cost approximately \$15,549,987.³⁶

39. If Route Alternative B is selected, Great River Energy would later assess whether a new greenfield breaker station would be added between Augusta and Victoria Substations. A breaker station is not proposed as part of this Project. Based on current anticipated load growth, absent another project that otherwise alleviates the need, the additional breaker station would be needed within 10-15 years. That timeframe is variable, however, and could accelerate if load growth accelerates, or occur later if load growth is slower than currently anticipated. Great River Energy estimated that the construction and installation of a greenfield breaker station needed for Route Alternative B would cost approximately \$9,475,000.³⁷ POWER Engineers reviewed these estimates and determined they were reasonable and aligned with POWER Engineers' own analysis, which estimated between \$10.3 and \$13.4 million.³⁸

VIII. PUBLIC AND LOCAL GOVERNMENT PARTICIPATION

40. The Commission-Adopted Report discusses the Applicants' coordination with the public, stakeholders, and local governments, and stakeholders' participation in the route permitting process.³⁹

41. Great River Energy also sent correspondence to all landowners along the Proposed Route and Route Alternative B, as well as local government units, to inform them of the

³³ Ex. APP-2 at 3-8 (Application); Ex. APP-19 at 8 (Direct Testimony of M. Swenson).

³⁴ Applicants' Reply Comments to New and Modified Decision Options at 7-8 (Sept. 2, 2025) (eDocket No. [20259-222652-02](#)).

³⁵ Commission-Adopted Report at ¶ 99.

³⁶ Commission-Adopted Report at ¶ 292.

³⁷ EA Supplemental Appendix C at 14 (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)).

³⁸ POWER Engineers Independent Review at 5 (Nov. 10, 2025) (eDocket No. [202511-224791-01](#)).

³⁹ Commission-Adopted Report at ¶¶ 103-116.

supplemental process and encourage them to participate in the current comment period and/or to contact Great River Energy with any questions.⁴⁰ Great River Energy summarized the responses it received to this correspondence in its Initial Comments.⁴¹

42. During the supplemental comment period, two local government units,⁴² one federal agency,⁴³ one utility company,⁴⁴ and fifteen members of the public submitted written comments.⁴⁵ The comments discussed the Project, with the majority of comments supporting Route Alternative B due to its higher percentage of right-of-way sharing and increased distance from the City of Carver. The Applicants submitted reply comments on December 23, 2025.⁴⁶

IX. FACTORS FOR A ROUTE PERMIT

43. The Power Plant Siting Act (PPSA), Minn. Stat. ch. 216E, requires that route permit determinations “be guided by the state’s goal to conserve resources, minimize environmental impacts, minimize human settlement and other land use conflicts, and ensure the state’s electric energy security through efficient, cost-effective power supply and electric transmission infrastructure.”⁴⁷

44. Under the PPSA, the Commission must be guided by the following responsibilities, procedures, and considerations:

- (1) evaluation of research and investigations relating to the effects on land, water and air resources of large electric power generating plants and high-voltage transmission lines and the effects of water and air discharges and electric and magnetic fields resulting from such facilities on public health and welfare, vegetation, animals, materials and aesthetic values, including baseline studies, predictive modeling, and evaluation of new or improved methods for minimizing adverse impacts of water and air discharges and other matters pertaining to the effects of

⁴⁰ Applicants’ Initial Comments at 2-4 (Dec. 16, 2025) (eDocket No. [202512-225903-01](#)).

⁴¹ See Applicants’ Initial Comments (Dec. 16, 2025) (eDocket No. [202512-225903-01](#)).

⁴² City of Carver Comments (Dec. 17, 2025) (eDocket No. [202512-225951-01](#)); City of Victoria Comments (Dec. 8, 2025) (eDocket No. [202512-225603-01](#)).

⁴³ USFWS Comments (Dec. 15, 2025) (eDocket No. [202512-225823-01](#)).

⁴⁴ Xcel Energy Comments (Dec. 15, 2025) (eDocket No. [202512-225858-01](#)).

⁴⁵ Public Comments Batch 1 (Dec. 16, 2025) (eDocket No. [202512-225923-01](#)); Russell Schlegelmilch Comment (Dec. 17, 2025) (eDocket No. [202512-225936-01](#)); Jo Eiden Comment (Dec. 17, 2025) (eDocket No. [202512-225940-01](#)); Anthony Schuster Comment (Dec. 17, 2025) (eDocket No. [202512-225949-01](#)); Patty Eiden Comment (Dec. 17, 2025) (eDocket No. [202512-225950-01](#)); Greg Boe Comment (Dec. 17, 2025) (eDocket No. [202512-225952-01](#)); Don Schlegelmilch Comment (Dec. 18, 2025) (eDocket No. [202512-225996-01](#)).

⁴⁶ See MVEC Reply Comments (Dec. 23, 2025) (eDocket No. [202512-226136-01](#)); Great River Energy Reply Comments (Dec. 23, 2025) (eDocket No. [202512-226177-01](#)).

⁴⁷ Minn. Stat. § 216E.03, subd. 7. Minn. Stat. Ch. 216I becomes effective on July 1, 2025. Because the Application was filed prior to July 1, 2025, Minn. Stat. Ch. 216E applies to the Application.

power plants on the water and air environment;

- (2) environmental evaluation of sites and routes proposed for future development and expansion and their relationship to the land, water, air and human resources of the state;
- (3) evaluation of the effects of new electric power generation and transmission technologies and systems related to power plants designed to minimize adverse environmental effects;
- (4) evaluation of the potential for beneficial uses of waste energy from proposed large electric power generating plants;⁴⁸
- (5) analysis of the direct and indirect economic impact of proposed sites and routes including, but not limited to, productive agricultural land lost or impaired;
- (6) evaluation of adverse direct and indirect environmental effects that cannot be avoided should the proposed site and route be accepted;
- (7) evaluation of alternatives to the applicant's proposed site or route proposed pursuant to subdivisions 1 and 2;
- (8) evaluation of potential routes that would use or parallel existing railroad and highway rights-of-way;
- (9) evaluation of governmental survey lines and other natural division lines of agricultural land so as to minimize interference with agricultural operations;
- (10) evaluation of the future needs for additional high-voltage transmission lines in the same general area as any proposed route, and the advisability of ordering the construction of structures capable of expansion in transmission capacity through multiple circuiting or design modifications;
- (11) evaluation of irreversible and irretrievable commitments of resources should the proposed site or route be approved;

⁴⁸ Factor 4 is not applicable because Applicant is not proposing to site a large electric generating plant in this docket.

- (12) when appropriate, consideration of problems raised by other state and federal agencies and local entities;
- (13) evaluation of the benefits of the proposed facility with respect to (i) the protection and enhancement of environmental quality, and (ii) the reliability of state and regional energy supplies;
- (14) evaluation of the proposed facility's impact on socioeconomic factors; and
- (15) evaluation of the proposed facility's employment and economic impacts in the vicinity of the facility site and throughout Minnesota, including the quantity and quality of construction and permanent jobs and their compensation levels. The commission must consider a facility's local employment and economic impacts, and may reject or place conditions on a site or route permit based on the local employment and economic impacts.

45. In addition, Minn. Stat. § 216E.03, subd. 7(e), provides that the Commission “must make specific findings that it has considered locating a route for a high-voltage transmission line on an existing high-voltage transmission line route and the use of parallel existing highway right-of-way and, to the extent those are not used for the route, the [C]ommission must state the reasons.”⁴⁹

46. In addition to the PPSA, the Commission is governed by Minn. R. 7850.4100, which mandates consideration of the following factors when determining whether to issue a route permit for a HVTL:

- A. effects on human settlement, including, but not limited to, displacement, noise, aesthetics, cultural values, recreation, and public services;
- B. effects on public health and safety;
- C. effects on land-based economies, including, but not limited to, agriculture, forestry, tourism, and mining;
- D. effects on archaeological and historic resources;
- E. effects on the natural environment, including effects on air and water quality resources and flora and fauna;
- F. effects on rare and unique natural resources;

⁴⁹ See Minn. Stat. § 216E.03, subd. 7(e).

- G. application of design options that maximize energy efficiencies, mitigate adverse environmental effects, and could accommodate expansion of transmission or generating capacity;
- H. use or paralleling of existing rights-of-way, survey lines, natural division lines, and agricultural field boundaries;
- I. use of existing large electric power generating plant sites;⁵⁰
- J. use of existing transportation, pipeline, and electrical transmission systems or rights-of-way;
- K. electrical system reliability;
- L. costs of constructing, operating, and maintaining the facility which are dependent on design and route;
- M. adverse human and natural environmental effects which cannot be avoided; and
- N. irreversible and irretrievable commitments of resources.⁵¹

47. There is sufficient evidence in this record to assess the Project using the criteria and factors set forth above.

X. APPLICATION OF ROUTING FACTORS TO THE PROPOSED ROUTE AND ROUTE ALTERNATIVE B

A. Effects on Human Settlement.

48. Minnesota law requires consideration of the Project's effects on human settlement, including displacement of residences and businesses, noise created by construction and operation of the Project, and impacts to aesthetics, cultural values, recreation, and public services.⁵² The Commission-Adopted Report previously discussed these factors, and the findings in this Supplemental Report are limited to a comparison of the Proposed Route and Route Alternative B, as developed during the Supplemental Comment Period.⁵³

⁵⁰ This factor is not applicable because it applies only to power plant siting.

⁵¹ See Minn. R. 7850.4100.

⁵² Minn. Stat. § 216E.03, subd. 7(b); Minn. R. 7850.4100, subp. A.

⁵³ Commission-Adopted Report at ¶¶ 122-185.

1. Displacement.

49. The record developed during the Supplemental Comment Period does not reflect that any existing residences or businesses will be displaced by the Proposed Route or Route Alternative B.

50. There are no residences within 50 feet of any of the routing options. The Proposed Route has no residences within 100 feet of the alignment; and Route Alternative B has one residence within 100 feet of the alignment.⁵⁴ If the alignment of Route Alternative B is moved from the south to the north side of Augusta Road between Kelly Avenue and Jersey Avenue, the impacted residence would be more than 100 feet from the transmission line centerline.

2. Noise.

51. No further record development regarding noise occurred during the Supplemental Comment Period, and the Commission previously determined that the Project will comply with state noise requirements, regardless of which route is selected.⁵⁵

3. Aesthetics.

52. Both the Proposed Route and Route Alternative B will introduce new built features—structures, conductors, and a substation—on the landscape. The Applicants have committed to working with landowners to identify concerns related to Project aesthetics regardless of which route is selected.⁵⁶

53. During the Supplemental Comment Period, members of the public expressed concern about potential visual impacts of the Proposed Route.⁵⁷

4. Land Use and Zoning.

54. The EA previously concluded that “impacts are anticipated to be minimal, if it all, since HVTL does not have a large potential to change underlying land use,” and also that “[i]nterference with county zoning ordinances is not expected.”⁵⁸

55. During the Supplemental Comment Period, comments expressed concern about the Proposed Route’s potential impacts on agriculture, particularly in areas where it does not follow existing road right-of-way, and on future development outside the City of Carver.

56. Agricultural impacts were addressed in Chapter 4 of the EA, and that analysis continues to reflect potential impacts on the Proposed Route and Route Alternative B.⁵⁹

⁵⁴ Ex. EERA-11 at 26 (EA).

⁵⁵ Commission-Adopted Report ¶¶ 136, 138.

⁵⁶ Ex. EERA-11 at 26-27 (EA).

⁵⁷ Anthony Schuster Comment (Dec. 17, 2025) (eDocket No. [202512-225949-01](#)); Public Comments Batch 1 (Dec. 16, 2025) (eDocket No. [202512-225923-01](#)).

⁵⁸ Ex. EERA-11 at IV (EA).

⁵⁹ Ex. EERA-11 at 52-55 (EA).

57. With respect to potential future development, the City of Carver reaffirmed its prior position regarding the Proposed Route, expressing concern about the Proposed Route’s potential limitation on future development.⁶⁰ Likewise, Great River Energy’s responses are reflected in detail in the record, with Applicants explaining that 115 kV facilities are common features on the landscape and typically consistent with residential, commercial, and industrial development, particularly in the future timeframe contemplated by the City of Carver.⁶¹ The record likewise reflects that the City of Carver and Great River Energy have met and corresponded throughout the course of this proceeding.⁶²

5. Cultural Values.

58. The record developed during the Supplemental Comment Period does not reflect that cultural values will be affected by the Proposed Route or Route Alternative B.

6. Recreation.

59. The record developed during the Supplemental Comment Period does not reflect that recreation will be affected by the Proposed Route or Route Alternative B.

7. Socioeconomics.

60. The record developed during the Supplemental Comment Period does not reflect that the Project will negatively impact socioeconomics if either the Proposed Route or Route Alternative B is selected.

8. Environmental Justice.

61. The record developed during the Supplemental Comment Period does not reflect that environmental justice will be affected by the Proposed Route or Route Alternative B.

9. Public Service and Infrastructure.

62. The record developed during the Supplemental Comment Period does not reflect that public services or infrastructure will be affected by the Proposed Route or Route Alternative B.

⁶⁰ City of Carver Comments (Dec. 17, 2025) (eDocket No. [202512-225951-01](#)).

⁶¹ Ex. APP-17 at 3-6 (Response to Scoping Comments); Ex. APP-21 at 12-14 (Comments regarding EA); Applicants’ Post-Hearing Comments at 9 (June 9, 2025) (eDocket No. [20256-219727-01](#)).

⁶² Applicants’ Initial Comments at 2-3 (Dec. 16, 2025) (eDocket No. [202512-225903-01](#)); Ex. APP-17 at 2 (Response to Scoping Comments); Ex. APP-21 at 13 (Comments regarding EA, with Attachments 1-4); Applicants’ Post-Hearing Comments at 7 (June 9, 2025) (eDocket No. [20256-219727-01](#)); Applicants’ Exceptions to Report at 7, 10 (July 30, 2025) (eDocket No. [20257-221553-01](#)).

10. Electronic Interference.

63. The record developed during the Supplemental Comment Period does not reflect the Proposed Route or Route Alternative B will result in electronic interference.⁶³

B. Effects on Public Health and Safety.

64. Minnesota's HVTL routing factors require consideration of the Project's potential effect on health and safety.⁶⁴ The Commission-Adopted Report previously discussed these factors, and the findings in this Supplemental Report are limited to a comparison of the Proposed Route and Route Alternative B, as developed during the Supplemental Comment Period.⁶⁵

1. Electromagnetic Fields (EMF).

65. The record developed during the Supplemental Comment Period does not reflect the Proposed Route or Route Alternative B will result in impacts due to EMF.

2. Stray Voltage.

66. The record developed during the Supplemental Comment Period does not reflect the Proposed Route or Route Alternative B will result in stray voltage impacts.

3. Induced Voltage.

67. The record developed during the Supplemental Comment Period does not reflect the Proposed Route or Route Alternative B will cause impacts due to induced voltage.

C. Effects on Land-Based Economies.

68. Minnesota's HVTL routing factors require consideration of the Project's impacts to land-based economies—specifically, agriculture, forestry, tourism, and mining.⁶⁶ The Commission-Adopted Report previously discussed these factors, and the findings in this Supplemental Report are limited to a comparison of the Proposed Route and Route Alternative B, as developed during the Supplemental Comment Period.⁶⁷

1. Agriculture.

69. The record developed during the Supplemental Comment Period does not reflect the Proposed Route or Route Alternative B will cause significant impacts to agriculture.

70. The Proposed Route consists of 38.8 percent of prime farmland along the route, and Route Alternative B consists of 35.1 percent. Route Alternative B impacts a higher percentage of

⁶³ Commission-Adopted Report at ¶¶ 183-185.

⁶⁴ Minn. Stat. § 216E.03, subd. 7(b)(1); Minn. R. 7850.4100, subp. B.

⁶⁵ Commission-Adopted Report at ¶¶ 186-194.

⁶⁶ Minn. Stat. § 216E.03, subd. 7(b)(5); Minn. R. 7850.4100, subp. C.

⁶⁷ Commission-Adopted Report at ¶¶ 195-207.

farmland of statewide importance than the Proposed Route (22.1 percent compared to 17.4 percent, respectively).⁶⁸

71. During the Supplemental Comment Period, commenters expressed concern about the Proposed Route’s potential agricultural impacts, particularly where the Proposed Route deviates from existing road rights-of-way.⁶⁹ The EA determined that “[i]mpacts to agriculture are expected to be minimal for all routing options.”⁷⁰

2. Forestry.

72. The record developed during the Supplemental Comment Period does not reflect the Proposed Route or Route Alternative B will impact forestry operations.

3. Mining.

73. The record developed during the Supplemental Comment Period does not reflect the Proposed Route or Route Alternative B will impact mining operations.

4. Tourism.

74. The record developed during the Supplemental Comment Period does not reflect the Proposed Route or Route Alternative B will negatively impact tourism in the Project area.

D. Effects on Archaeological and Historic Resources.

75. Minnesota Rule 7850.4100, subparagraph D, requires consideration of the effects of the Project on historic and archaeological resources.⁷¹ The Commission-Adopted Report previously discussed this factor, and the findings in this Supplemental Report are limited to a comparison of the Proposed Route and Route Alternative B, as developed during the Supplemental Comment Period.⁷²

76. Once a route is selected, Great River Energy will follow guidance from the Minnesota State Historic Preservation Office and complete the recommended Phase 1 archaeological survey on the selected route and at the Laketown Substation location.⁷³

E. Effect on Natural Environment.

77. Minnesota’s HVTL routing factors require consideration of the Project’s effect on the natural environment, including effects on air and water quality resources and flora and fauna.⁷⁴

⁶⁸ Ex. Ex. EERA-11 at 53 (EA).

⁶⁹ City of Carver Comments (Dec. 17, 2025) (eDocket No. [202512-225951-01](#)); Public Comments Batch 1 (Dec. 16, 2025) (eDocket No. [202512-225923-01](#)); Greg Boe Comment (Dec. 17, 2025) (eDocket No. [202512-225952-01](#)); Anthony Schuster Comment (Dec. 17, 2025) (eDocket No. [202512-225949-01](#)).

⁷⁰ Ex. EERA-11 at 97 (EA).

⁷¹ See Minn. R. 7850.4100, subp. D.

⁷² Commission-Adopted Report at ¶¶ 208-213.

⁷³ Commission-Adopted Report at ¶ 213.

⁷⁴ Minn. Stat. § 216E.03, subd. 7(b)(1)–(2); Minn. R. 7850.4100, subp. E.

The Commission-Adopted Report previously discussed these factors, and the findings in this Supplemental Report are limited to a comparison of the Proposed Route and Route Alternative B, as developed during the Supplemental Comment Period.⁷⁵

1. Air Quality.

78. The record developed during the Supplemental Comment Period does not reflect the Proposed Route or Route Alternative B will have a long-term negative impact on air quality in the Project area.

2. Greenhouse Gas Emissions (GHG).

79. The record developed during the Supplemental Comment Period does not reflect the Proposed Route or Route Alternative B will have a significant impact on GHG emissions in the Project area.

3. Climate Change.

80. The record developed during the Supplemental Comment Period does not reflect the Proposed Route or Route Alternative B will impact climate change.⁷⁶

4. Geology and Topography.

81. The record developed during the Supplemental Comment Period does not reflect the Proposed Route or Route Alternative B will have a negative impact on geology or topography in the Project area.

5. Soils.

82. The record developed during the Supplemental Comment Period does not reflect the Proposed Route or Route Alternative B will negatively impact soil conditions in the Project area.

6. Water Quality and Resources.

83. The Commission-Adopted Report previously discussed these factors, and the findings in this Supplemental Report are limited to a comparison of the Proposed Route and Route Alternative B, as developed during the Supplemental Comment Period.⁷⁷

(1) Groundwater.

84. The record developed during the Supplemental Comment Period does not reflect the Proposed Route or Route Alternative B will negatively impact groundwater in the Project area

⁷⁵ Commission-Adopted Report at ¶¶ 214-266.

⁷⁶ EA Supplemental Appendix C at 4 (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)).

⁷⁷ Commission-Adopted Report at ¶¶ 230-256.

(2) *Wells.*

85. The record developed during the Supplemental Comment Period does not reflect the Proposed Route or Route Alternative B will impact wells in the Project area.

(3) *Surface Water.*

86. The record developed during the Supplemental Comment Period does not reflect the Proposed Route or Route Alternative B will negatively impact surface water in the Project area.

(4) *Wetlands.*

87. The record developed during the Supplemental Comment Period does not reflect the Proposed Route or Route Alternative B will negatively impact wetlands in the Project area.

88. The Proposed Route would impact 0.03 acres of wetland (all of which are riverine/pond/lake wetlands), and Route Alternative B would impact 0.0 acres of wetland.⁷⁸ During the Supplemental Comment Period, commenters noted increased wetland crossings of the Proposed Route as compared to Route Alternative B.⁷⁹

(5) *Impaired Waters.*

89. The record developed during the Supplemental Comment Period does not reflect the Proposed Route or Route Alternative B will negatively impact impaired waters in the Project area.

(6) *Floodplains.*

90. The record developed during the Supplemental Comment Period does not reflect the Proposed Route or Route Alternative B will negatively impact floodplains in the Project area.

7. Flora.

91. The record developed during the Supplemental Comment Period does not reflect the Proposed Route or Route Alternative B will negatively impact flora in the Project area.

92. The Applicants anticipate clearing approximately five acres of trees within the 100-foot-wide right-of-way along the Proposed Route.⁸⁰ Route Alternative B has approximately 0 acres of tall growing vegetation within the right-of-way, so tree clearing would likely be less along Route

⁷⁸ Ex. EERA-11 at 72 (EA).

⁷⁹ Public Comments Batch 1 (Dec. 16, 2025) (eDocket No. [202512-225923-01](#)); Greg Boe Comment (Dec. 17, 2025) (eDocket No. [202512-225952-01](#)).

⁸⁰ Ex. APP-2 at 6-37 (Application).

Alternative B. During the Supplemental Comment Period, comments expressed concern about tree clearing along the Proposed Route.⁸¹

8. Fauna.

93. The record developed during the Supplemental Comment Period does not reflect the Proposed Route or Route Alternative B will negatively impact fauna in the Project area.

F. Rare and Unique Natural Resources.

94. Minnesota's HVTL routing factors require consideration of the Project's effect on rare and unique natural resources.⁸² The Commission-Adopted Report previously discussed these factors, and the findings in this Supplemental Report are limited to a comparison of the Proposed Route and Route Alternative B, as developed during the Supplemental Comment Period.⁸³

95. The record developed during the Supplemental Comment Period does not reflect the Proposed Route or Route Alternative B will negatively impact rare and unique natural resources in the Project area.

G. Application of Various Design Considerations.

96. Minnesota's HVTL routing factors require consideration of the Project's applied design options that maximize energy efficiencies, mitigate adverse environmental effects, and could accommodate expansion of the transmission system in the area.⁸⁴ The Commission-Adopted Report previously discussed these factors, and the findings in this Supplemental Report are limited to a comparison of the Proposed Route and Route Alternative B, as developed during the Supplemental Comment Period.⁸⁵

97. The Project enables Great River Energy to provide 115-kV service to the Laketown Substation to meet long-term electricity planning needs.⁸⁶ The Project is designed to maintain necessary reliability requirements in the area and is designed to maximize energy efficiencies and accommodate expansion capacity.⁸⁷

98. POWER Engineers determined that the Proposed Route would lessen the likelihood of outages for local customers compared to Route Alternative B. In the future, Route Alternative B could require a costly new greenfield breaker substation to provide system load separation similar to the proposed route, nullifying any short-term cost savings from the shorter line.⁸⁸

⁸¹ Public Comments Batch 1 (Dec. 16, 2025) (eDocket No. [202512-225923-01](#)); Greg Boe Comment (Dec. 17, 2025) (eDocket No. [202512-225952-01](#)); Anthony Schuster Comment (Dec. 17, 2025) (eDocket No. [202512-225949-01](#)).

⁸² Minn. Stat. § 216E.03, subd. 7(b)(1); Minn. R. 7850.4100, subp. F.

⁸³ Commission-Adopted Report at ¶¶ 267-274.

⁸⁴ Minn. Stat. § 216E.03, subd. 7(b)(2); Minn. R. 7850.4100, subp. G.

⁸⁵ Commission-Adopted Report at ¶ 275-277.

⁸⁶ EA Supplemental Appendix C at 4 (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)).

⁸⁷ EA Supplemental Appendix C at 4 (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)).

⁸⁸ POWER Engineers Independent Review at 6 (Nov. 10, 2025) (eDocket No. [202511-224791-01](#)).

H. Use of or Paralleling of Existing Rights-of-Way, Survey Lines, Natural Division Lines, and Agricultural Field Boundaries.

99. Minnesota's HVTL routing factors require consideration of the Project's use of paralleling of existing right-of-way, survey lines, natural division lines, and agricultural field boundaries.⁸⁹ The Commission-Adopted Report previously discussed these factors, and the findings in this Supplemental Report are limited to a comparison of the Proposed Route and Route Alternative B, as developed during the Supplemental Comment Period.⁹⁰

100. Approximately 2.4 miles, or 53.5 percent of the Proposed Route will be collocated with existing right-of-way.⁹¹ In some of these areas, the road rights-of-way are also adjacent to existing aboveground MVEC distribution lines.⁹² During the public hearing, a member of the public noted a concern about the Project passing through farm fields.⁹³ Great River Energy noted during the public hearing that the construction of the Project would generally follow property lines (to increase distances from homes) where not already following a roadway.⁹⁴

101. Route Alternative B is approximately 94 percent collocated with existing utility or road right-of-way.⁹⁵ Similarly, during the Supplemental Comment Period, members of the public highlighted Route Alternative B's higher percentage of following road rights-of-way.⁹⁶

I. Use of Existing Transportation, Pipeline, and Electrical Transmission System Rights-of-Way.

102. Minnesota HVTL routing factors require consideration of the Project's use of existing transportation, pipeline, and electrical transmission system rights-of-way.⁹⁷ The Commission-Adopted Report previously discussed these factors, and the findings in this Supplemental Report are limited to a comparison of the Proposed Route and Route Alternative B, as developed during the Supplemental Comment Period.⁹⁸

103. Approximately 2.4 miles, or 53.5 percent of the Proposed Route will be collocated with existing right-of-way. Route Alternative B is approximately 94 percent collocated with existing utility or road right-of-way.⁹⁹

⁸⁹ Minn. Stat. § 216E.03, subd. 7(b)(9); Minn. R. 7850.4100, subp. H.

⁹⁰ Commission-Adopted Report at ¶¶ 278-281.

⁹¹ Ex. APP-2 at 3-2 (Application).

⁹² Ex. APP-2 at 3-2 (Application).

⁹³ Public Hearing Transcript at 40-43 (May 21, 2025).

⁹⁴ Public Hearing Transcript at 15 (May 21, 2025).

⁹⁵ Ex. Ex. EERA-11 at 26 (EA).

⁹⁶ Public Comments Batch 1 (Dec. 16, 2025) (eDocket No. [202512-225923-01](#)); Russell Schlegelmilch Comment (Dec. 17, 2025) (eDocket No. [202512-225936-01](#)); Anthony Schuster Comment (Dec. 17, 2025) (eDocket No. [202512-225949-01](#)); Patty Eiden Comment (Dec. 17, 2025) (eDocket No. [202512-225950-01](#)); Greg Boe Comment (Dec. 17, 2025) (eDocket No. [202512-225952-01](#)); City of Carver Comment (Dec. 17, 2025) (eDocket No. [202512-225951-01](#)).

⁹⁷ Minn. Stat. § 216E.03, subd. 7(b)(8); Minn. R. 7850.4100, subp. J.

⁹⁸ Commission-Adopted Report at ¶¶ 282-284.

⁹⁹ Ex. Ex. EERA-11 at 26 (EA).

J. Electrical System Reliability.

104. Minnesota's HVTL routing factors require consideration of the Project's impact on electrical system reliability.¹⁰⁰

105. Great River Energy designed the Project to accommodate availability and reliability requirements in the area and, because it is proposed at 115-kV, it is sized to accommodate future expansion when electric loads increase.¹⁰¹

106. Analysis of the reliability of the local electrical grid as a result of the Project, conducted by the Applicants as well as the independent POWER Engineers, concludes that the Proposed Route has increased reliability benefits over Route Alternative B.¹⁰²

107. The Proposed Route would optimally site the Laketown Substation in relation to the Transmission Line to allow for the installation of a transmission bus breaker at the substation, thereby splitting both exposure and loading evenly on the system with two MVEC distribution substations on 13 miles of exposure on one circuit and two MVEC distribution substations on 17 miles of exposure on a second circuit.¹⁰³ The purpose of the breaker is to enhance transmission reliability by sectionalizing the transmission line (i.e., minimizing the number of end users who lose service in the event of an outage).¹⁰⁴

108. In comparison, Route Alternative B would result in approximately 12 miles of exposure for one distribution substation on one circuit (4.3 MW) and 16 miles of exposure for 3 distribution substations on a second circuit (25.7 MW), if a breaker were to be installed. Thus, if Route Alternative B is selected as the permitted route, Great River Energy will not install the breaker at the proposed Laketown Substation site as, due to its non-centralized location relative to the transmission system and the imbalance of load, it does not provide a beneficial gain in reliability to the system.¹⁰⁵

109. In the Independent Report, POWER Engineers confirmed the Applicants' analysis, finding that the Proposed Route would evenly split the MVEC-specific load along the line. The Proposed Route also decreases the likelihood of power outages for customers along the line.¹⁰⁶

110. Compared to the Proposed Route, POWER Engineers determined that Route Alternative B does not offer the same reliability benefits, as existing load would not be split evenly, and adding a bus-tie circuit breaker would be less effective in improving the reliability of the

¹⁰⁰ Minn. R. 7850.4100, subp. K.

¹⁰¹ EA Supplemental Appendix C at 2 (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)).

¹⁰² EA Supplemental Appendix C at 10-12 (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)); POWER Engineers Independent Review at 1, 4 (Nov. 10, 2025) (eDocket No. [202511-224791-01](#)).

¹⁰³ Applicants' Reply Comments to New and Modified Decision Options (Sept. 2, 2025) (eDocket No. [20259-222652-01](#); [20259-222652-02](#); [20259-222652-03](#)).

¹⁰⁴ EA Supplemental Appendix C at 4 (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)).

¹⁰⁵ EA Supplemental Appendix C at 2 (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)); POWER Engineers Independent Review at 3 (Nov. 10, 2025) (eDocket No. [202511-224791-01](#)).

¹⁰⁶ POWER Engineers Independent Review at 2-3 (Nov. 10, 2025) (eDocket No. [202511-224791-01](#)).

transmission line due to the very uneven load separation and slightly less even lengths of the east and west circuits on each side of the potential breaker, compared to the proposed route.¹⁰⁷

111. POWER Engineers also agreed with Great River Energy’s analysis that if Route Alternative B was selected, a new greenfield breaker station would be required in the future to achieve similar load separation and reliability results as the proposed solution. Assuming load growth in the area occurs as anticipated, a breaker station would be needed in 10-15 years, and is a “very costly and inefficient solution compared to the proposed route and configuration.”¹⁰⁸

112. The Applicants’ Proposed Route would provide improved reliability by reducing transmission exposure to the existing substations in the area and providing redundant service to the new Laketown Substation. Reliability is one of multiple factors that the Commission must consider when designating a route, and Great River Energy acknowledged that the Commission may determine that other factors weigh in favor of Route Alternative B.

K. Costs of Constructing, Operating, and Maintaining the Facility.

113. Minnesota’s HVTL routing factors require consideration of the Project’s cost of construction, operation, and maintenance.¹⁰⁹ The Commission-Adopted Report previously discussed this factor, and the findings in this Supplemental Report are limited to a comparison of the Proposed Route and Route Alternative B, as developed during the Supplemental Comment Period.¹¹⁰

114. The Applicants estimate that the total cost of the Project will be approximately \$18 million using the Proposed Route.¹¹¹

115. Route Alternative B is estimated to cost approximately \$15,549,987.¹¹² A greenfield breaker station is not proposed as part of this project, but if a greenfield breaker station were later proposed and constructed, it is estimated to cost between \$9-13 million.¹¹³

L. Adverse Human and Natural Environmental Effects that Cannot be Avoided.

116. Minnesota’s HVTL routing factors require consideration of the adverse human and natural environmental effects that cannot be avoided.¹¹⁴ The Commission-Adopted Report

¹⁰⁷ POWER Engineers Independent Review at 3 (Nov. 10, 2025) (eDocket No. [202511-224791-01](#)).

¹⁰⁸ POWER Engineers Independent Review at 4 (Nov. 10, 2025) (eDocket No. [202511-224791-01](#)).

¹⁰⁹ Minn. R. 7850.4100, subp. L.

¹¹⁰ Commission-Adopted Report at ¶¶ 290-294.

¹¹¹ Commission-Adopted Report at ¶ 291.

¹¹² Commission-Adopted Report at ¶ 292.

¹¹³ EA Supplemental Appendix C at 14-15, (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)); POWER Engineers Independent Review at 5, Appendix B (Nov. 10, 2025) (eDocket No. [202511-224791-01](#)).

¹¹⁴ Minn. Stat. § 216E.03, subd. 7(b)(6); Minn. R. 7850.4100, subp. M.

previously discussed this factor, and the Supplemental Comment Period does not reflect additional information relevant to this factor.¹¹⁵

M. Irreversible and Irretrievable Commitments of Resources.

117. Minnesota’s HVTL routing factors require consideration of the irreversible and irretrievable commitments of resources that are necessary for the Project.¹¹⁶ The Commission-Adopted Report previously discussed this factor, and the findings in this Supplemental Report are limited to a comparison of the Proposed Route and Route Alternative B, as developed during the Supplemental Comment Period.¹¹⁷

118. The record developed during the Supplemental Comment Period does not reflect the Proposed Route or Route Alternative B will require a significant amount of irreversible and irretrievable commitment of resources.

XI. ROUTE PERMIT CONDITIONS

119. The EA and Draft Route Permit prepared by EERA included various recommendations and potential route permit conditions related to the Project, to which Great River Energy responded in Direct Testimony.¹¹⁸ The Commission-Adopted Report discusses the Draft Route Permit and various recommendations to the Draft Route Permit.¹¹⁹ The October 2025 Order adopts these findings.¹²⁰

120. The Applicants indicate that they do not support one of the conditions identified in the Commission-Adopted Report. Specifically, the Commission-Adopted Report recommended that the Commission require that “Applicants conduct only winter tree-clearing for the Project.”¹²¹ In Post-Hearing Comments, the Applicants addressed this recommendation in detail. There, the Applicants committed to 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. The Applicants also stated that this proposed condition is broader than typically required by the Commission and not necessitated by this Project, especially in light of the Minnesota Department of Natural Resources’ MCE review, MCE-23-00902, which indicated that no state-listed endangered or threatened species, including bats, have been documented within the vicinity of the 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.” Finally, 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

¹¹⁵ Commission-Adopted Report at ¶¶ 295-296.

¹¹⁶ Minn. Stat. § 216E.03, subd. 7(b)(11); Minn. R. 7850.4100, subp. N.

¹¹⁷ Commission-Adopted Report at ¶¶ 297-298.

¹¹⁸ Ex. EERA-11 at Appendix B (Draft Route Permit); Ex. APP-19 at 9-10 (Direct Testimony of M. Swenson).

¹¹⁹ Commission-Adopted Report at ¶¶ 306-311.

¹²⁰ October 2025 Order at Ordering ¶ 1.

¹²¹ Commission-Adopted Report at ¶ 310.

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.¹²²

121. The Applicants maintain that that the record does not support such a stringent condition here, is inconsistent with prior Commission requirements, and should not be included in the issuance of a route permit for the Project for either the Proposed Route or Route Alternative B.¹²³

122. With this additional comment by the Applicants, the record does not support a condition requiring winter-only tree clearing for the Project.

XII. NOTICE

123. The October 2025 Order finds that all requisite notice was appropriately given pursuant to Minn. Stat. § 216E.04, subd. 4; Minn. R. 7850.2100, subp. 2; and Minn. R. 7850.2100, subp. 4.¹²⁴

124. Commission staff issued notice of comment period on the independent consultant report and for additional record development on November 17, 2025.¹²⁵

125. Great River Energy also sent correspondence to all landowners along the Proposed Route and Route Alternative B, as well as local government units, to inform them of the supplemental process and encourage them to participate in the current comment period and/or to contact Great River Energy with any questions.¹²⁶

XIII. COMPLETENESS OF EA

126. The October 2025 Order also concludes that the EA and the record created at the public hearing address the issues identified in the Scoping Decision, except as the EA relates to the details on the reliability concerns of Route Alternative B as compared to the Applicants' Proposed Route. The October 2025 Order directed the Applicants to supplement their response at Appendix C of the EA to provide this additional information.¹²⁷

127. Supplemental Appendix C to the EA was filed on October 28, 2025. This filing adequately addresses the October 2025 Order and the Commission's request for additional information on the potential reliability issues of Route Alternative B compared to the Applicants' Proposed Route.¹²⁸

¹²² Applicants' Post-Hearing Comments at 3-4 (June 9, 2025) (eDocket No. [20256-219727-01](#)).

¹²³ Applicants' Initial Comments at 4-5 (Dec. 16, 2025) (eDocket No. [202512-225903-01](#)).

¹²⁴ October 2025 Order at ¶ 1.

¹²⁵ Notice of Comment Period on Independent Consultant Report and for Additional Record Development (Nov. 17, 2025) (eDocket No. [202511-224978-01](#)).

¹²⁶ Applicants' Initial Comments at 2-3 (Dec. 16, 2025) (eDocket No. [202512-225903-01](#)).

¹²⁷ October 2025 Order at Ordering ¶ 2.

¹²⁸ See EA Supplemental Appendix C (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)).

128. The evidence in the record demonstrates that the Supplemental Appendix C to the EA adequately addresses the information requested in the October 2025 Order.¹²⁹

Based on the foregoing Findings of Fact and the record in this proceeding, the Commission makes the following:

CONCLUSIONS OF LAW

1. Any of the forgoing Findings of Fact more properly designated as Conclusions of Law are hereby adopted as such.

2. The Commission has jurisdiction to consider the Application.

3. The Commission determined that the Application was substantially complete and accepted the Application on October 1, 2024.¹³⁰

4. EERA has conducted an appropriate EA of the Project for purposes of this proceeding, and which satisfies Minn. R. 7850.3700 and 7850.3900. Supplemental Appendix C to the EA provided further information in response to the Commission's October 2025 Order. Specifically, the EA, the record, and Supplemental Appendix C address the issues identified in the Scoping Decision and the October 2025 Order to a reasonable extent considering the availability of information, and the EA includes the items required by Minn. R. 7850.3700, subp. 4, and was prepared in compliance with the procedures in Minn. R. 7850.3700.

5. Applicants gave notice as required by Minn. Stat. § 216E.04, subd. 4; Minn. R. 7850.2100, subp. 2; and Minn. R. 7850.2100, subp. 4.

6. A public hearing was conducted near the Proposed Route. Proper notice of the public hearing was provided, as required by Minn. Stat. § 216E.04, subd. 6, and the public was given the opportunity to speak at the hearing and to submit written comments. All procedural requirements for the Route Permit were met.

7. The evidence in the record demonstrates that Route Alternative B satisfies the Route Permit factors set forth in Minn. Stat. § 216E.04, subd. 8 (referencing Minn. Stat. § 216E.03, subd. 7) and Minn. R. 7850.4100.

8. There is no feasible and prudent alternative to the construction of the Project, and the Project is consistent with and reasonably required for the promotion of public health and welfare in light of the state's concern for the protection of its air, water, land, and other natural resources as expressed in the Minnesota Environmental Rights Act.

9. The evidence in the record demonstrates that Route Alternative B is the best route for the Project.

¹²⁹ Ex. EERA-6 (EA Scoping Decision).

¹³⁰ Ex. PUC-2 (Order Accepting Application as Complete).

10. The evidence in the record demonstrates that the general Route Permit conditions are appropriate for the Project, with the revisions and clarifications proposed by the Applicants.¹³¹

11. The evidence in the record demonstrates that the special condition identified in Section XI, above, is appropriate for the Project.

12. Any of the foregoing Conclusions of Law which are more properly designated Findings of Fact are hereby adopted as such.

Based upon these Conclusions, the Administrative Law Judge makes the following:

RECOMMENDATION

Based upon these Conclusions, the Administrative Law Judge recommends that the Commission issue a Route Permit for Route Alternative B with an alignment along the north side of Augusta Road to Great River Energy and Minnesota Valley Electric Cooperative to construct and operate the Project and associated facilities in Carver County.

THIS REPORT IS NOT AN ORDER AND NO AUTHORITY IS GRANTED HEREIN. THE MINNESOTA PUBLIC UTILITIES COMMISSION WILL ISSUE THE ORDER THAT MAY ADOPT OR DIFFER FROM THE PRECEDING RECOMMENDATION.

Dated: _____

KIMBERLY MIDDENDORF
Administrative Law Judge

¹³¹ See Ex. APP-21 (Comments regarding EA); Ex. APP-19 (Direct Testimony of M. Swenson); Ex. APP-20 (Direct Testimony of N. Goater).

**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

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

Breann L. Jurek certifies that on the 30th day of December 2025, she e-filed on behalf of Great River Energy, a true and correct copy of the Supplemental Proposed Findings of Fact, Conclusions of Law, and Recommendations with the Minnesota Public Utilities Commission via eDockets (www.edockets.state.mn.us). Said document was also served on the Official Service List on file with the Minnesota Public Utilities Commission and as attached hereto.

Executed on: December 30, 2025

Signed: /s/ Breann L. Jurek

Fredrikson & Byron, P.A.

60 South Sixth Street

Suite 1500

Minneapolis, MN 55402

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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	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		Yes	Official CC Service List OAH
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9	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
10	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
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14	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	Official CC Service List OAH
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