

April 8, 2025

**VIA E-FILING**

Sam Weaver  
Environmental Planning Director  
Minnesota Department of Commerce  
85 7th Place East, Suite 280  
St. Paul, MN 55101

**Re: In the Matter of the Application for a Certificate of Need and Route Permit for the Appleton to Benson 115 Kilovolt Transmission Line Project.  
MPUC Docket Nos. ET2,E017,ET6135,E100/CN-24-263 and TL-24-264**

Dear Mr. Weaver:

Great River Energy, Otter Tail Power Company (Otter Tail Power), Western Minnesota Municipal Power Agency (Western Minnesota), Agralite Electric Cooperative (Agralite), and the City of Benson (together, Applicants) submit these responses to comments provided during the scoping comment period related to the Appleton to Benson 115-kilovolt Transmission Line Project (Project) for consideration by the Department of Commerce, Energy Environmental Review and Analysis (DOC-EERA) in its preparation of the Environmental Assessment (EA).

Public information and scoping meetings were held for the Project on March 12, 2025 (two in-person meetings in Appleton, Minnesota, and Benson, Minnesota) and March 13 (virtual). No members of the public or agencies made comments during these meetings. Three agencies submitted written comments during the scoping period: the Minnesota Indian Affairs Council (MIAC), the Minnesota Department of Transportation (MnDOT), and the Minnesota Department of Natural Resources (MDNR).

MIAC submitted written comments dated January 27, 2025.<sup>1</sup> The comments note that there are no known or suspected burial sites that may be affected by the Project, and request that the Applicants have an Inadvertent Discovery Plan in place. The comments note that there are “No Concerns” related to the Project. The Applicants appreciate MIAC’s review of the Project and comments, and anticipate that cultural resources will be evaluated in the EA. As stated in the Application, the Applicants will develop and follow an Unanticipated Discoveries Plan for the Project.

MnDOT and MDNR also submitted written scoping comments.<sup>2</sup> The Applicants have no objection to the EA studying the topics noted in MnDOT’s and MDNR’s scoping comments. The

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<sup>1</sup> See Minnesota Council of Indian Affairs Comments (Jan. 27, 2025) (eDocket No. [20252-214980-01](#)).

<sup>2</sup> See MnDOT Comments (Mar. 27, 2025) (eDocket No. [20253-216894-01](#)); MDNR Comments (Mar. 28, 2025) (eDocket No. [20253-216974-01](#)).

Mr. Sam Weaver

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Applicants appreciate MnDOT's and MDNR's review of the Project and scoping comments provided in this docket.

The Applicants appreciate DOC-EERA's review of these comments and are available to provide information to assist DOC-EERA in its preparation of the EA for this Project. A copy of this filing is also being served upon the persons as designated on the Official Service List of record. Please let me know if you have any questions regarding this filing.

Sincerely,

*/s/ Haley Waller Pitts*

Haley L. Waller Pitts

**Direct Dial:** 612.492.7443

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**In the Matter of the Application for a  
Certificate of Need and Route Permit for  
the Appleton to Benson 115 Kilovolt  
Transmission Line Project**

**CERTIFICATE OF SERVICE**

**MPUC Docket Nos.  
ET2,E017,ET6135,E100/CN-24-263 and  
TL-24-264**

Maia Martinez certifies that on the 8th day of April, 2025, she e-filed on behalf of Applicants, a true and correct copy of their Scoping Comments with the Minnesota Public Utilities Commission via eDockets ([www.edockets.state.mn.us](http://www.edockets.state.mn.us)). Said documents were also served on the Official Service Lists of record on file with the Minnesota Public Utilities Commission and as attached hereto.

Executed on: April 8, 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	Lisa	Agrimonti	lagrimonti@fredlaw.com	Fredrikson & Byron, P.A.		60 South Sixth Street Suite 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	Official 24-263
2	Cody M.	Bauer	cbauer@fredlaw.com	Fredrikson & Byron, P.A.		60 South 6th Street, Suite 1500 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-263
3	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 24-263
4	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 24-263
5	Thomas	Hoffman	thoffman@agralite.com	Agralite Electric Cooperative		320 Highway 12 SE Benson MN, 56215 United States	Electronic Service		No	Official 24-263
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7	Kris	Koch	kkoch@otpc.com	Otter Tail Power Company		215 S. Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	Official 24-263
8	Stacy	Kotch Egstad	stacy.kotch@state.mn.us	MINNESOTA DEPARTMENT OF TRANSPORTATION		395 John Ireland Blvd. St. Paul MN, 55155 United States	Electronic Service		No	Official 24-263
9	Stephen	Kowal	skowal@bensonmnlaw.com	Wilcox Law Office, P.A.		1150 Wisconsin Avenue Benson MN, 56215 United States	Electronic Service		No	Official 24-263
10	David C.	McLaughlin	dmclaughlin@fluegellaw.com	Western Minnesota Municipal Power Agency		129 2nd Street Ortonville MN, 56278 United States	Electronic Service		No	Official 24-263
11	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	Electronic Service		No	Official 24-263

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13	Mark	Strohfus	mstrohfus@greenergy.com		Great River Energy	12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	Official 24-263
14	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 24-263
15	Brian	Zavesky	brianz@mrenergy.com		Missouri River Energy Services	3724 West Avera Drive P.O. Box 88920 Sioux Falls SD, 57108-8920 United States	Electronic Service		No	Official 24-263

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3	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 24-264
4	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 24-264
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7	Kris	Koch	kkoch@otpc.com	Otter Tail Power Company		215 S. Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	Official 24-264
8	Stacy	Kotch Egstad	stacy.kotch@state.mn.us	MINNESOTA DEPARTMENT OF TRANSPORTATION		395 John Ireland Blvd. St. Paul MN, 55155 United States	Electronic Service		No	Official 24-264
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