

June 2, 2025

Consumer Affairs Office  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101

RE: EERA Hearing Comments  
Laketown 115 kV Transmission Line Project  
**PUC Docket No.** ET2/TL-24-132  
**OA H Docket No.** 21-2500-40445

Dear Consumer Affairs Office:

Minnesota Department of Commerce (DOC), Energy Environmental Review and Analysis (EERA) staff offers the following comments on the Laketown 115 kV Transmission Line Project (project) proposed by Great River Energy (GRE) and Minnesota Valley Electric Cooperative (MVEC).

In these comments EERA:

- Summarizes changes between the sample route permit filed by the Minnesota Public Utilities Commission (Commission) and the proposed draft route permit (DRP) included as Appendix B of the Environmental Assessment (EA) prepared for the project,
- Responds to GRE and MVEC comments on the EA and,
- Responds to a public comment presented during the public hearings.

## Site Permit Modifications

The Commission issued a sample route permit on October 10, 2024.<sup>1</sup> EERA included a DRP as Appendix B of the EA.<sup>2</sup> The DRP indicated changes from the Commission-issued sample permit by underline and strikeout. In these comments, EERA summarizes the changes between the sample permit and EERA's DRP.

### *Updated Project Description (Cover, Sections 1, 2, and 4)*

EERA's proposed DRP updates the sample permit to include project-specific information in the cover and in sections 1, 2, and 4.

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<sup>1</sup> Public Utilities Commission, *Sample HVTL Route Permit*, October 10, 2024, eDocket No. [202410-210863-01](#).

<sup>2</sup> DOC EERA, *Laketown 115 kV Transmission Line Project Environmental Assessment*, April 8, 2025, eDocket No. [20254-217369-01](#).

### *Phase 1 Archaeological Survey (Special Condition 6.1)*

EERA recommends a special condition requiring the permittees to conduct a Phase 1 archaeological survey of the permitted route, and to submit its findings to the State Historic Preservation Office (SHPO). Additionally, the permit condition requires the permittees to implement recommendations received by SHPO pending the results of the survey and to retain records of compliance and provide them to Commission staff upon request.

## Response to GRE and MVEC Comments on the EA

On May 13, 2025, GRE and MVEC submitted comments on the EA.<sup>3</sup> In the comments, the applicants made several comments on the EA which are summarized as:

- Providing more detail on the differentiation of each route alternative and reiterating the reasons why they were originally rejected as viable alternatives,
- Providing more details and context on the topics of reliability, land use and zoning, public utilities and infrastructure, residences, vegetation, existing rights-of-way, survey lines, natural division lines, and field boundaries, wetlands, and agriculture, and
- Providing additional context for potential permits, distribution, regions of influence, zoning, tourism, rare plants, and future projects.

EERA staff has no further comments on these comments provided by GRE and MVEC for the EA.

## Response to Public Comments

On May 21, 2025, a public hearing was held in Chaska, Minnesota. During this meeting, a member of the public, Patty Eiden, commented that her land was classified as agricultural preserve land.

GRE and MVEC discuss agricultural preserve land in their application.<sup>4</sup> The applicants' discussion includes analysis of the miles of agricultural preserve land crossed by their proposed route.<sup>5</sup> Agricultural preserve land was not discussed in the EA, and EERA takes this opportunity to address Ms. Eiden's comment.

According to Minnesota Statute 473H, the Metropolitan Agricultural Preserves Act, "any agency of the state, any public benefit corporation, any local, county or regional unit of government, or any other entity possessing powers of eminent domain under chapter 117, shall follow the procedures contained in this section before ... acquiring any land or easement having a gross area over ten acres in size within

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<sup>3</sup> Great River Energy and Minnesota Valley Energy Cooperative, *Laketown - Comments on the Environmental Assessment with Attachments 1-4*, May 13, 2025, eDocket No. [20255-218880-02](#).

<sup>4</sup> Great River Energy and Minnesota Valley Energy Cooperative, *Application, Section 4.3.1*, August 19, 2025, eDocket No. [20248-2099604-02](#).

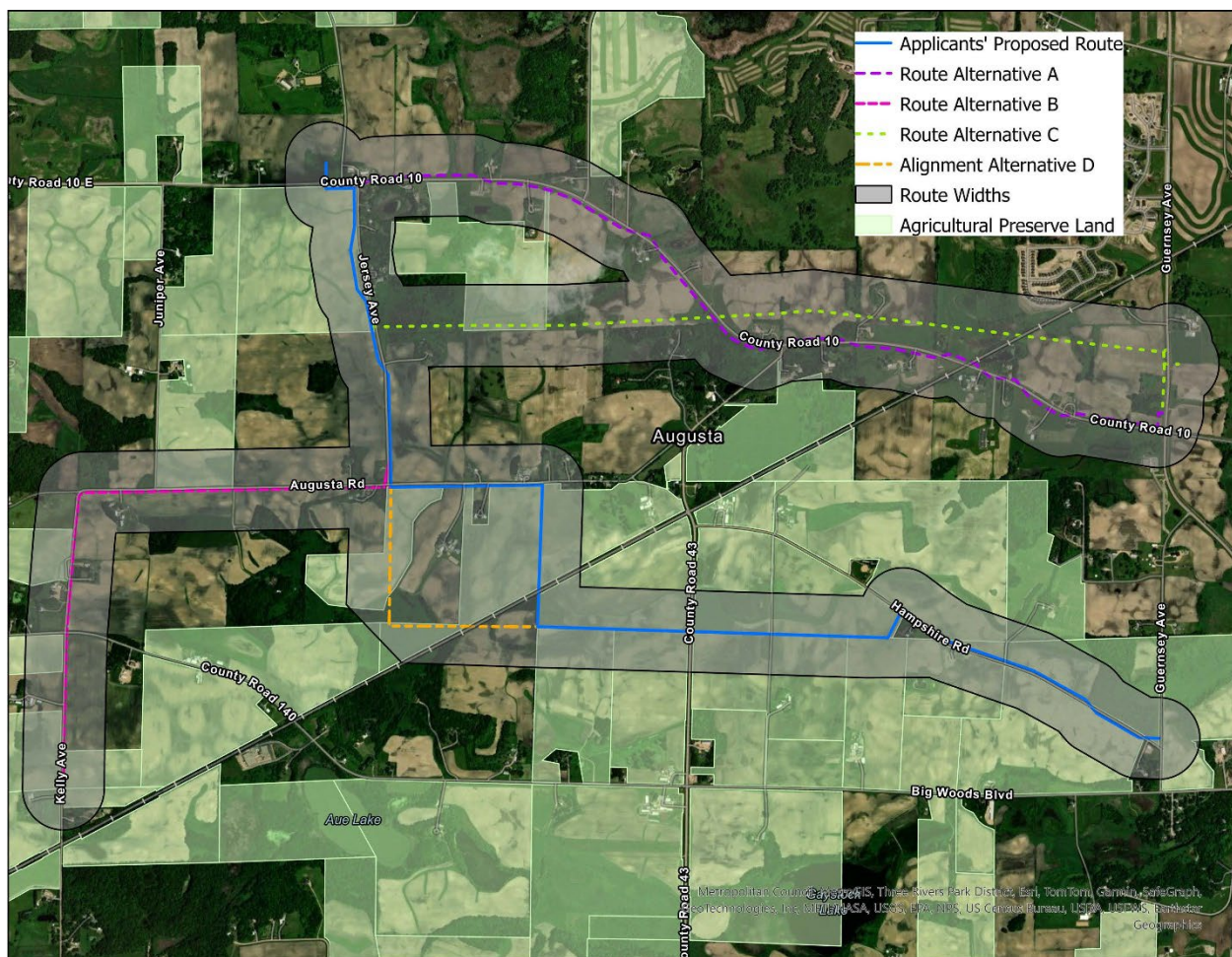
<sup>5</sup> Id.

agricultural preserves.”<sup>6</sup> The procedures are described within the statute and require an Environmental Quality Board notice and review.

Given the possibility that portions of the project may be protected under this act, a review of agricultural land was conducted to compare agricultural preserve land within the right-of-way (ROW) for each routing alternative.

Figure 1 depicts agricultural preserve land in the project area. Figure 1 was created using the Agricultural Preserves 2022 ESRI File Geodatabase, found on the Minnesota Geospatial Commons.<sup>7</sup>

**Figure 1** Agricultural Preserve Land in Project Area



<sup>6</sup> Minn. Stat. 473H.15, subd. 1.

<sup>7</sup> Minnesota Geospatial Commons, *Agricultural Preserves 2022*, December 31, 2022, <https://gisdata.mn.gov/dataset/us-mn-state-metc-agri-agricultural-preserves2022>.

Using ArcGIS, EERA staff conducted an analysis to compare the acreage of agricultural preserve land within the ROW of each routing alternative. Table 1 shows the results of the analysis.

**Table 1** Acres of Agricultural Preserve Land within the ROW of Routing Alternatives

Route	Total Acres
Applicants' Proposed Route	37.09
Route Alternative A	1.17
Route Alternative B	7.60
Route Alternative C	9.56
Applicants' Proposed Route with Alignment Alternative D	36.01

Given the results of the analysis, the Applicants' Proposed Route and the Applicants' Proposed Route with Alignment Alternative D, should either be permitted, may need to undergo the process for acquiring easements described in Minnesota Statute 473H.15, as they exceed the 10-acre qualification for the statute.

EERA appreciates the opportunity to comment on the proposed project.

Sincerely,

A handwritten signature in black ink, appearing to read "Logan Hicks", with a stylized, cursive script.

Logan Hicks  
EERA Environmental Review Manager