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April 27, 2026

VIA E-FILING
Sasha Bergman
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, MN 55101-2147

Re: In Matter of the Application of Big Bend Wind, LLC and Great River Energy for a Route Permit for a 161-kV high voltage transmission line and associated facilities in Martin County
MPUC Docket No. IP7013/TL-25-389
CAH Docket Number: 22-2500-41594

Dear Ms. Bergman:

Big Bend Wind, LLC (Big Bend) and Great River Energy (the Applicants) respectfully submit these comments in response to written comments submitted during the public hearing comment period ending on April 20, 2026, on the Application for a Route Permit (Application) for the proposed 4.5 mile 161 kilovolt (kV) high voltage transmission line (HVTL) and associated facilities in Martin County, Minnesota (Project) filed with the Minnesota Public Utilities Commission (Commission).[1] During the comment period, written comments were submitted by the Minnesota Department of Natural Resources (DNR)[2] and Mr. Brian Hansen.[3] The Applicants appreciate the opportunity to offer this response as well as to highlight one update noted during the public hearing relative to the Cedar Lutheran Cemetery. With these comments, the Applicants also provide Proposed Findings of Fact and Conclusions of Law for the convenience of Commission staff in reviewing this docket.

1. DNR.

The DNR filed public hearing comments on the Project on April 20, 2026. In its public hearing comments, the DNR stated that it had reviewed the route permit application for the proposed Project and confirmed the agency's concurrence with the draft route permit language. The DNR indicated that it has no additional comments or recommendations beyond those already reflected in the draft permit and expressed appreciation for the opportunity to provide input on the construction and operation of the Project.[4]

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[1] No comments were submitted during the in-person or virtual public hearings on April 7 and 8, 2026 respectively.
[2] DNR Public Hearing Comments (April 20, 2026) (eDocket No. 20264-230702-01).
[3] Public Comment by Brian K. Hansen (April 9, 2026) (eDocket No. 20264-230200-01).
[4] DNR Public Hearing Comments (April 20, 2026) (eDocket No. 20264-230702-01).

The Applicants appreciate DNR's comments and the agency's support of the draft route permit language. The Applicants will continue to coordinate with the DNR on the Project's VMP and the applicable DNR permits for water appropriation, work in public waters, and crossings of public waters and state lands.

2. Mr. Brian Hansen.

Mr. Brian K. Hansen submitted a public hearing comment on April 9, 2026, stating that he is a participating landowner in the Project area and supports the proposed Big Bend and Great River Energy 161-kV transmission line extension in Martin County. He explains that he has been actively engaged with Big Bend during route development and emphasized his preference that transmission line poles be located along existing road right-of-way to minimize impacts to his farming operations. Mr. Hansen noted that an early routing option along the northern edge of one of his parcels—similar to an alternative suggested by another commenter—was not acceptable to him, and that he instead strongly favored a route farther south along 220th Avenue. He affirms that the route ultimately proposed in the permit application aligns with his preference and has his full support. Mr. Hansen also noted that he has family members buried at the Cedar Lutheran Cemetery and states that he has no objection to the transmission line being routed around the cemetery.[5]

The Applicants appreciate Mr. Hansen's comments and his support of the Project.

3. Screening Agreement with Cedar Lutheran Cemetery.

Ahead of route permit issuance, Big Bend has taken steps to comply with the Commission's Energy Infrastructure Permitting (EIP) Staff's recommended Draft Route Permit Special Permit Condition 6.3 (Cemetery Screening) by beginning coordination with the manager(s) of the Cedar Lutheran Cemetery regarding additional tree plantings that could minimize aesthetic impacts of the transmission line on individuals visiting the cemetery.

At the April 7, 2026, in-person public hearing in Windom, Minnesota, Big Bend announced that it had executed a screening agreement with the Cedar Lutheran Cemetery to help mitigate the visual impacts of routing the transmission line around the cemetery's parcel.[6]

4. Corrected Redlined Draft Route Permit for Big Bend Wind, LLC.

On April 1, 2026, the Applicants mistakenly submitted the redlined draft route permit for Great River Energy as Schedules C and D to Brie Anderson's Direct Testimony. Schedule C was intended to include a redline of the Big Bend Route Permit. Here, the Applicants provide the corrected Schedule C with redlines of the Draft Route Permit filed by EIP Staff which specifically

[5] Public Comment by Brian K. Hansen (April 9, 2026) (eDocket No. 20264-230200-01).
[6] *See* Windom 6:00 P.M. Public Hearing Transcript at 12:7-12 (April 7, 2026) (Windom 6:00 PM Pub. Hrg. Tr.)

reflect the portions of the Project that will be owned and operated by Big Bend.

As stated in Section 2.2 of the Application, Big Bend Wind and Great River Energy are co-applicants for this Application and request that the Commission grant separate route permits for each applicant, reflecting the respective portions of the Project that will be owned by each. Big Bend Wind will own the 161-kV transmission line and Step-up Substation. Great River Energy will own the Interconnection Substation and the 345-kV conductors between the Step-up Substation, Interconnection Substation, and the existing Lakefield Generating Substation. Issuing separate permits to the Applicants will allow for greater transparency with regard to future compliance with each respective permit.

The Applicants respectfully ask the Commission to issue the attached redlined draft route permit to Big Bend for the Project and separately issue Great River Energy the redlined draft route permit provided in Schedule D of Brie Anderson's direct testimony[7] on April 1, 2026.

These comments have 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.

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[7] *See* Brie Anderson Direct Testimony - Schedule D (April 1, 2026) (eDocket No. 20264-229908-06).

STATE OF MINNESOTA
BEFORE THE
PUBLIC UTILITIES COMMISSION

In Matter of the Application of Big Bend Wind, LLC and Great River Energy for a Route Permit for a 161-kV high voltage transmission line and associated facilities in Martin County

CAH Docket Number: 22-2500-41594
MPUC Docket No. IP7013/TL-25-389

BIG BEND WIND, LLC AND GREAT RIVER ENERGY PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW

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STATE OF MINNESOTA

PUBLIC UTILITIES COMMISSION

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CAH Docket Number: 22-2500-41594
MPUC Docket No. IP7013/TL-25-389

BIG BEND WIND, LLC AND GREAT RIVER ENERGY PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW

Big Bend Wind, LLC (Big Bend) and Great River Energy (collectively, the Applicants) have applied for a Route Permit (Application) to construct and operate a 161 kilovolt (kV) high voltage transmission line (HVTL) and associated facilities in Martin County, Minnesota (Project).

Public hearings on the Application were held on April 7, 2026 (in-person) and April 8, 2026 (remote-access). The factual record remained open until April 20, 2026, for the receipt of written public comments.

STATEMENT OF ISSUES

Have the Applicants satisfied the criteria established in Minn. Stat. Ch. 216I for a route permit for the Project?

SUMMARY

Applicants have satisfied the applicable legal requirements and, accordingly, the Minnesota Public Utilities Commission (Commission) GRANTs a route permit to each Applicant for the Project, subject to the conditions discussed below.

Based on the evidence in the hearing record, the Commission makes the following:

FINDINGS OF FACT

I. THE APPLICANTS

1. Big Bend and Great River Energy are the Applicants.[1]

2. Big Bend is developing an approximately 311.1 megawatts (MW) wind project and associated facilities in portions of Cottonwood, Watonwan, and Martin Counties. The wind project is more fully described in Big Bend's Site Permit Application and related filings in MPUC Docket Number IP-7013/WS 19-619. The Commission issued Big Bend a site permit for the wind project

[1] *See* Route Permit Application at 1 (Dec. 10, 2025) (eDocket No. 202512-225711-02) (Application).

in September 2022, extended the site permit in December 2024, and issued an amended site permit on February 25, 2026.[2]

3. Founded in 2009, Apex is a full-service renewable energy company that develops, constructs, and operates utility-scale generation and associated transmission facilities across the United States. Driven by a team of more than 400 professionals and headquartered in Charlottesville, Virginia; Apex has developed more than 45 projects totaling over eight gigawatts of capacity. In 2024 alone, Apex constructed eight projects across the country: three solar projects, three wind projects, and two energy storage projects.[3]

4. Great River Energy provides electricity and related services to approximately 1.7 million people and serves two-thirds of Minnesota and parts of Wisconsin. Great River Energy's electric system is interconnected directly with neighboring suppliers and is a member of the Midwest Reliability Organization (MRO) and Midcontinent Independent System Operator (MISO).[4]

5. Great River Energy's mission is to safely provide affordable, reliable energy in harmony with a sustainable environment. Great River Energy owns and operates more than 5,100 miles of transmission line (69-kV or higher) and owns more than 100 substations in Minnesota, North Dakota, South Dakota, and Wisconsin. Great River Energy designs and maintains a portfolio of power generation facilities and transmission resources to deliver reliable and affordable wholesale electricity to the regional electricity market.[5]

II. PROCEDURAL HISTORY

6. On December 10, 2025, the Applicants filed the Application.[6]

7. On December 24, 2025, the Commission filed the Application Completeness Determination finding that the Application was sufficiently complete and requested the Applicants submit a supplemental filing on property values.[7]

8. On December 29, 2025, the Applicants filed supplemental comments regarding the Application and the Commission's request for additional review and analysis of the Project's potential impacts on property values and possible mitigation measures.[8]

9. On December 30, 2025, the Commission issued the Notice of Complete Route Permit Application and Public Information Meetings scheduling an in-person public meeting in Windom, Minnesota for January 13, 2026, and a virtual public meeting for January 14, 2026. The

[2] Application at 1; PUC Order (February 25, 2026) (eDocket No. 20262-228618-01).
[3] Application at 1.
[4] Application at 1.
[5] Application at 1.
[6] *See generally* Application.
[7] PUC Application Completeness Determination (Dec. 24, 2025) (eDocket No. 202512-226198-01).
[8] Applicants Completeness Supplemental Comments (Dec. 29, 2025) (eDocket No. 202512-226243-01).

Commission also requested that the public submit comments regarding the Application by January 26, 2026.[9]

10. On January 15, 2026, the Commission filed the sample route permit for the Project.[10]

11. On January 26, 2026, the Minnesota Department of Natural Resources (DNR) filed comments regarding the Application and recommended several impact mitigation measures for the Project.[11] The Applicants filed an Environmental Assessment (EA) addendum scoping comments.[12] The Commission published the public meeting transcripts.[13] Ms. Dana Scholl filed a public comment recommending a route alternative.[14]

12. On January 27, 2026, the Commission filed a public comment submitted by Cory Ebeling.[15]

13. On February 18, 2026, the Commission's Energy Infrastructure Permitting (EIP) Staff filed a summary of the public information and scoping meetings, public comments, a draft route permit for the Project, and also provided recommendations to the Commission on whether an EA addendum is required for the Project.[16]

14. On February 26, 2026, the Commission filed information requests 1-4, requesting the Applicants' response by March 4, 2026.[17]

15. On February 27, 2026, the Commission filed the notice of the March 12, 2026, Agenda Meeting for the Project.[18]

16. On March 4, 2026, the Applicants filed responses to the Commission's Information Requests 1-4.19 The Commission filed the Staff Briefing Papers for the March 12, 2026, Agenda Meeting.[20]

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[9] Notice of Complete Route Permit Application and Public Information Meetings (Dec. 30, 2025) (eDocket No. 202512-226288-01).
[10] Sample Route Permit (. 15, 2026) (eDocket No. 20261-226969-01).
[11] DNR Comments (Jan. 26, 2026) (eDocket No. 20261-227416-01).
[12] Big Bend Wind and Great River Energy – EA Addendum Scoping Comments (Jan. 26, 2026) (eDocket No. 20261-227398-01).
[13] PUC Public Information Meeting Minutes 1-13-26 (Jan. 26, 2026) (eDocket No. 20261-227391-02) and PUC Public Information Meeting Minutes 1-14-26 (Jan. 26, 2026) (eDocket No. 20261-227391-03).
[14] Scholl Comment and Alternative Map 1-13-26 (Jan. 26, 2026), eDocket No. 20261-227391-01).
[15] Cory Ebeling Public Comment (Jan. 27, 2026) (eDocket No. 20261-227431-01).
[16] EIP Staff Scoping Summary and Draft Route Permit (Feb. 18, 2026) (eDocket No. 20262-228314-01).
[17] PUC Information Requests 1-4 (Feb. 26, 2026) (eDocket No. 20262-228675-01).
[18] PUC Notice of Commission Meeting (Feb. 27, 2026) (eDocket No. 20262-228608-01).
[19] Big Bend Wind and Great River Energy – Response to PUC IRs 1-4 (March 4, 2026) (eDocket No. 20263-228948-01).
[20] PUC Staff Briefing Papers (March 4, 2026) (eDocket No.

17. On March 11, 2026, the Commission filed Commissioner Tuma's Decision Options for the March 12, 2026, Agenda Meeting.[21]

18. On March 23, 2026, the Court of Administrative Hearings issued an order for prehearing conference with Administrative Law Judge Christa L. Moseng for March 23, 2026.[22]

19. On March 24, 2026, the Administrative Law Judge issued an order for public hearings scheduling an in-person public hearing for April 7, 2026, in Windom, Minnesota and a virtual public hearing for April 8, 2026.[23]

20. Also on March 24, 2026, The Commission issued an order finding that an EA addendum is not required for the Project, issuing a draft route permit for the Project, and requesting that an Administrative Law Judge conduct the public hearing and prepare a summary of public testimony.[24] The Commission also published the notice of public hearings and availability of draft permit, scheduling an in-person public hearing for April 7, 2026, in Windom, Minnesota and a virtual public hearing for April 8, 2026. The Commission requested that members of the public submit written comments by April 20, 2026, on the following topics: (1) whether the Commission should grant a route permit for the proposed 161 kV Transmission Line Project, and (2) if granted, what additional conditions or requirements should be included in the route permit?[25]

21. On April 1, 2026, the Applicants filed Brie Anderson's direct testimony and Schedules A-E.[26]

22. On April 9, 2026, the Commission submitted a public comment from Brian K. Hansen.[27]

23. On April 15, 2026, the Commission filed the publication of the Notice of Complete Route Permit Application and Public Information Meetings in the Minnesota Environmental Quality Board (EQB) Monitor.[28]

24. On April 20, 2026, the DNR filed public hearing comments regarding the Project.[29]

III. THE PROPOSED PROJECT

A. Project Summary

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[21] PUC Briefing Papers – Commissioner Tuma Decision Options (March 11, 2026) (eDocket No. 20263-229162-01).
[22] Order for Prehearing Conference (March 23, 2026) (eDocket No. 20263-229558-01).
[23] Order for Public Hearing (March 24, 2026) (eDocket No. 20263-229599-01).
[24] PUC Order (March 24, 2026) (eDocket No. 20263-229587-01).
[25] PUC Notice of Public Hearings and Availability of Draft Permit (March 24, 2026) (eDocket No. 20263-229581-01).
[26] Brie Anderson Direct Testimony and Schedules A-E (April 1, 2026) (eDocket Nos. 20264-229908-01, 20264-229908-02, 20264-229908-03, 20264-229908-04, 20264-229908-05, 20264-229908-06, 20264-229908-07) (Anderson Direct).
[27] Public Comment by Brian K. Hansen (April 9, 2026) (eDocket No. 20264-230200-01).
[28] EQB Monitor (April 15, 2026) (eDocket No. 20264-230444-01).
[29] DNR Public Hearing Comments (April 20, 2026) (eDocket No. 20264-230702-01).

25. The Applicants propose to construct and operate a 4.5-mile 161 kV transmission line and associated facilities, including new substations, that will connect the Project to the existing Lakefield Generating Substation in Martin County, Minnesota. The proposed Project extends the approximately 18-mile 161 kV transmission line and associated facilities previously permitted by the Commission in Docket Number IP-7013/TL-19-621.[30]

26. The Proposed Route is in Cedar Township in Martin County.[31] The transmission line departs from the previously permitted route at Structure 144 which is east of 40th Avenue, south of 240th Street and north of 230th Street, approximately 9.5 miles southeast of Mountain Lake. It will travel approximately 4.5 miles south/southwest to a new Big Bend-owned substation located adjacent to Great River Energy's existing Lakefield Junction Station. This new substation, referred to as the Step-up Substation, will convert the electricity from 161-kV to 345-kV. The Step-up Substation will interconnect to a new GRE-owned substation referred to as the Interconnection Substation, which then interconnects to the existing Lakefield Generating Substation.

27. Big Bend proposes to use 70- to 120-foot-tall steel or laminate wood structures with spans of approximately 600 to 800 feet. Longer spans might be used to accommodate landowner requests and/or design around features such as stream crossings and the Cedar Lutheran Cemetery. Generally, Big Bend has obtained a 100-foot-wide easement when the transmission line follows parcel lines and a 150-foot-wide easement when adjacent to road right-of-way. To avoid the Cedar Lutheran Cemetery while also minimizing transmission structure placement in the middle of agricultural fields, Big Bend has coordinated with a private landowner to acquire an approximately 200-foot easement to accommodate a longer span length between structures in the vicinity of the cemetery. Big Bend has secured 100 percent of the private easements from landowners for the Proposed Right-of-Way required for the Project. The Proposed Right-of-Way is the necessary right-of-way for the safe construction and operation of the transmission line.[32]

28. Big Bend will construct a new 161-/345-kV Step-up Substation that will interconnect to a new Interconnection Substation to be constructed by Great River Energy. These substations will be constructed on the same pad. The pad will be sized to accommodate an additional substation. This area, referred to as the Substation Development Area, comprises approximately 6.5 acres immediately adjacent to the existing Great River Energy-owned Lakefield Junction Station.[33]

29. A short, less than 100-foot 345-kV transmission line, to be owned by Great River Energy, will link the Step-up Substation and Interconnection Substation. A similar transmission line, approximately 300 feet in length, will connect the Interconnection Substation with the Lakefield Generating Substation. Breakers and switches will be installed to ensure safe and reliable operation of the transmission line. Great River Energy owns the property where the Substation

[30] Application at 1.
[31] Application at 1 and 36.
[32] Anderson Direct at 3:14-28.
[33] Application at 23.

Development Area is located. The Substation Development Area is completely within the Proposed Route.[34]

30. Generally, Big Bend has obtained a 100-foot-wide easement when the transmission line follows parcel lines and a 150-foot-wide easement when adjacent to road right-of-way. To avoid the Cedar Lutheran Cemetery while also minimizing transmission structure placement in the middle of agricultural fields, Big Bend has coordinated with a private landowner to acquire an approximately 200-foot easement to accommodate a longer span length between structures in the vicinity of the cemetery.[35]

31. Big Bend has, through voluntary negotiations, acquired all the private land rights necessary to construct the Project. The Proposed Route is well suited for development because it follows existing roads and/or parcel lines to the extent practicable, avoids residences, and minimizes impacts on the environment and the typical farming practices of the affected landowners for which Big Bend has voluntary easements.[36]

32. The Applicants anticipate construction to begin in third quarter 2026 with an anticipated commercial operation date of first quarter 2028.[37]

33. The proposed 161-kV transmission line will be designed to meet or surpass all relevant local and state codes, North American Electric Reliability Corporation (NERC) standards, and the National Electrical Safety Code (NESC). Appropriate standards will be met for construction and installation, and applicable safety procedures will be followed during and after installation.[38]

B. Need Overview

34. The Project is needed to interconnect Big Bend's approximately 311.1 MW wind project to the transmission grid.[39]

35. The Interconnection Substation is needed because the wind project is a surplus generation interconnect, which must be located on the generation side at the point of interconnection. Currently the Lakefield Generating Substation has three positions on the generation side, all of which are occupied by existing natural gas turbines.[40]

36. Because the Project directly interconnects a wind energy conversion system to the transmission grid, no certificate of need is required.[41]

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[34] Anderson Direct at 4:1-14; Application at 1-2
[35] Application at 2.
[36] Anderson Direct at 4:18-24; and Application at 2 and 19.
[37] Application at 26; and Anderson Direct at 5-6.
[38] Application at 18.
[39] Application at 1.
[40] Application at 1.
[41] Minn. Stat. § 216B.243, subd. 8(10).

C. Transmission Line Structures and Conductors

37. Big Bend proposes to use 70- to 120-foot-tall steel or laminate wood structures with spans of approximately 600 to 800 feet. Longer spans might be used to accommodate landowner requests and/or design around features such as stream crossings and the Cedar Lutheran Cemetery.[42]

38. The Project may use three types of structures:

- Dead end: used at 90-degree turns and within the step-up and interconnection substations;
- Angle: used in locations where the alignment turns; and
- Tangent: for in-line (straight) segments.[43]

39. For the short length of the transmission line routed parallel to the existing 345-kV transmission line and around the cemetery (200-foot right-of-way) and in coordination with the landowners to minimize structures in agricultural fields, the span lengths will be closer to 1,100 feet. Structures would be directly embedded into the ground, unless poor soil or geotechnical conditions necessitate concrete foundations. The wood poles have a diameter of approximately 30 inches. Drilled pier foundations may vary from approximately three to six feet in diameter and 20 to 30 feet or more in depth, depending on soil conditions.[44]

D. Right-of-Way and Route Width

40. New right-of-way is required for the Project. Big Bend has, through voluntary negotiations, acquired all the private land rights necessary to construct the Project.[45]

E. Substation and Associated Facilities

41. As mentioned above, Big Bend will construct a new 161-/345-kV Step-up Substation that will interconnect to a new Interconnection Substation to be constructed by Great River Energy. These substations will be constructed on the same pad. The pad will be sized to accommodate an additional substation. This area, referred to as the Substation Development Area, comprises approximately 6.5 acres immediately adjacent to the existing Great River Energy-owned Lakefield Junction Station. This area will include a 5.8-acre substation pad. The remainder is temporary workspace. The substation pad will be fenced. Within this substation pad, Big Bend will have a 161-/345-kV Step-up Substation (approximately 185 feet by 370 feet; 1.6 acres) and Great River Energy will have an Interconnection Substation (approximately 465 feet by 170 feet; 1.8 acres). The remaining 2.4 acres will be set aside for future expansion for Great River Energy (approximately 280 feet by 370 feet; 2.4 acres). Each individual substation will be fenced and be

[42] Anderson Direct at 3:14-18.
[43] Application at 18.
[44] Application at 18.
[45] Application at 19.

properly grounded. The future expansion area will be graded and graveled, but no other work will be completed in this area. A stormwater retention pond may be constructed adjacent to the Substation Development Area depending on final design.[46]

42. A short, less than 100-foot 345-kV transmission line, to be owned by Great River Energy, will link the Step-up Substation and Interconnection Substation. A similar transmission line, approximately 300 feet in length, will connect the Interconnection Substation with the Lakefield Generating Substation. Breakers and switches will be installed to ensure safe and reliable operation of the transmission line. Great River Energy owns the property where the Substation Development Area is located. The Substation Development Area is completely within the Proposed Route.[47]

F. Project Schedule

43. Following the necessary permits and approvals, Big Bend anticipates that construction on the Project will commence in the third quarter of 2026, and the Project will be in-service in the first quarter of 2028. The Project In-Service date is dependent on full construction of the Big Bend Wind Project; the Project will not take the full duration from start of construction to in-service to build. Big Bend and Great River Energy anticipate construction of the transmission line will last approximately four months and both substations up to nine months.[48]

G. Project Costs

44. The Project is expected to cost approximately $50.5 million dollars. Costs will likely vary depending on several factors, including material and labor costs. The Applicants currently estimate that costs could vary +/- 20 percent.[49]

45. Costs associated with operation and maintenance of the transmission line are expected to be approximately $1,500 per mile annually. Actual costs will depend on the age of the transmission line, storm damage, etc. Costs associated with operating and maintaining the substations are expected to be approximately $10,000 to $20,000 per substation per year.[50]

H. Permittee

46. Big Bend will own and operate the 161-kV transmission line and the new 161/345-kV step-up substation. Great River Energy will own the new 345-kV Interconnection Substation. Big Bend and Great River Energy will own the structures within their respective substations; however, the 345-kV conductor traveling between these substations will be owned by Great River Energy.[51]

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[46] Application at 23.
[47] Application at 2.
[48] Application at 26.
[49] Application at 25.
[50] Application at 24.
[51] Application at 2.

IV. PUBLIC AND LOCAL GOVERNMENT PARTICIPATION

A. Applicants' Outreach

47. In September 2025, Big Bend provided notification letters to 126 individuals at the Tribal Nations, agencies and organizations. Consistent with Minn. Stat. § 216I.05, subdivision 5, these letters provided information about the Project, requested comments, and provided recipients the opportunity to request a pre-application coordination meeting.[52]

48. There are four private landowners that own ten parcels along the Proposed Route, along with the Great River Energy-owned parcel at the terminus of the Project. Big Bend has coordinated with each of these private landowners to route the transmission line across the parcels in such a way that minimizes impacts to the landowner's use of their property. The result of this coordination is executed easement agreements.[53]

B. Participation in Route Permit Docket

49. The public information and scoping meetings were held on January 13 and 14, 2026, with a written comment period open until January 26, 2026. Two persons spoke at the public meetings – Ms. Dana Scholl and Mr. Bob Ewert. Ms. Scholl noted potential aesthetic impacts on a local cemetery. Mr. Ewert indicated his support for the Project.[54] Two written comments were filed by members of the public regarding the Project. Ms. Scholl reiterated her concerns regarding potential impacts to a cemetery and suggested a potential alternative route for the Project (the Scholl Alternative).[55] Mr. Cory Ebeling indicated his support for the Project and noted that he had no objection to the Project passing near the Cedar Lutheran Cemetery.[56]

50. The DNR submitted scoping comments and provided several recommendations. The DNR recommended a special permit condition prohibiting tree removal between June 1 and August 15 to protect bats, including the federally endangered northern long-eared bat, during the maternity roosting season. The DNR supported continued coordination with the Vegetation Management Plan Working Group (VMPWG) to refine the Project's Vegetation Management Plan (VMP), emphasizing careful timing of vegetation removal, preservation of floodplain vegetation where feasible, responsible herbicide use, and minimization of impacts to sensitive areas, and it recommended that the finalized plan and documentation of coordination be filed with the Commission. The DNR also expressed support for the standard permit conditions addressing lighting, dust control, and wildlife-friendly erosion control. Finally, the DNR noted that the Project will require applicable DNR permits for water appropriation, work in public waters, and crossings of public waters and state lands, which must be obtained through established DNR permitting processes.[57]

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[52] Application at 3.
[53] Application at 3.
[54] *See generally* Windom 6:00 P.M Public Information and Scoping Meeting Transcript (Jan. 13, 2026) (Windom 6:00 P.M Tr.)
[55] Scholl Comment and Alternative Map 1-13-26 (Jan. 26, 2026), eDocket No. 20261-227391-01).
[56] Cory Ebeling Public Comment (Jan. 27, 2026) (eDocket No. 20261-227431-01).
[57] DNR Scoping Comments (Jan. 26, 2026) (eDocket No. 20261-227416-01).

51. EIP Staff submitted comments summarizing the scoping meetings and public comment period and also made recommendations to the Commission. EIP Staff found that the Application, initially filed in December 2025 and later supplemented with analysis of potential property value impacts, to be complete. Based on public meetings, written comments, and agency input, Staff concluded that concerns raised about aesthetic impacts to the Cedar Lutheran Cemetery and an alternative route (the Scholl Alternative) did not warrant further environmental review because the alternative would largely shift impacts to other landowners, increase impacts to agricultural land and trees, and is not constructible due to the inability to obtain voluntary easements. Accordingly, EIP Staff recommended that no EA addendum be prepared. Staff further recommended that the Commission issue a draft route permit that incorporates standard conditions and three special conditions: prohibiting tree removal from June 1 through August 15, requiring coordination with DNR and Martin County on a tree replacement plan, and coordinating with the Cedar Lutheran Cemetery to provide additional vegetative screening to mitigate visual impacts. Finally, EIP Staff recommended that the Commission request an administrative law judge to conduct a public hearing and prepare a summary of public testimony.[58]

52. As part of Commission's decision at the March 12, 2026, Agenda Meeting to not require the preparation of an EA addendum to study the Scholl Alternative, Big Bend was required to have additional conversations with landowners in the Project Area[59] regarding the Scholl Alternative and the Commission's decision to not study the alternative.[60]

53. Big Bend's development team spoke with a local landowner, Mr. Jeffrey Scholl, on March 18, 2026. Mr. Jeffrey Scholl is Ms. Dana Scholl's husband and represented her interests during the call. Big Bend explained to Mr. Scholl that the Commission considered the Scholl Alternative but ultimately chose not to require an EA addendum that would include the route alternative proposed by Ms. Dana Scholl. Mr. Scholl asked several questions about Big Bend's route development activities, to which Big Bend provided additional information. Big Bend also relayed to Mr. Scholl that it is working with the Cedar Lutheran Cemetery Association (Association) to plant trees to provide some screening to minimize the aesthetic impacts due to the transmission line.[61]

54. Big Bend spoke with Mr. Steven Scholl on March 20, 2026. Mr. Steven Scholl said that he is aware of the Project and does not have any comments at this time. Mr. Steven Scholl stated that he refers any comments on the Project to his nephew Jeffrey Scholl who manages the property. Big Bend informed Mr. Steven Scholl about the upcoming public hearings for the Project and the opportunity for him, Jeffrey, and/or Dana Scholl to attend. Mr. Steven Scholl acknowledged and said that he was appreciative of the call.[62]

55. At the March 12, 2026, Agenda Meeting, the Commission also requested that Big Bend coordinate with the Association on vegetative screening to mitigate potential visual impacts

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[58] EIP Staff Scoping Summary and Draft Route Permit (Feb. 18, 2026) (eDocket No. 20262-228314-01).
[59] The "Project Area" is the general area within an approximate 1-mile radius of the Extension Project. *See* Application at vi.
[60] Order (March 24, 2026) (eDocket No. 20263-229587-01).
[61] Anderson Direct at 9-10.
[62] Anderson Direct at 10.

from the proposed transmission line. Pursuant to the Commission's request, Big Bend spoke with Mr. Everett Garlisch (member of the Association) on March 18, 2026. During that conversation, Big Bend discussed the Scholl Alternative that was proposed by Ms. Dana Scholl at the EA Addendum Scoping Meeting and subsequently rejected by the Commission at the March 12, 2026, Agenda Meeting. Big Bend also discussed the special permit condition requiring Big Bend to coordinate with the Association on vegetative screening around the cemetery to reduce the aesthetic impacts. Big Bend raised the possibility of entering into a screening agreement with the Association. Mr. Garlisch requested that Big Bend send him a summary of the screening proposal in an email and a draft of the screening agreement so that he can circulate the draft to the Association at their April meeting for review and approval. Big Bend provided a Cemetery Screening Agreement to Mr. Garlisch on March 30, 2026, for the Association's consideration.[63]

56. The public hearings for the Project were held on April 7 and 8, 2026, with an open comment period remaining open until April 20, 2026. No members of the public spoke at either of the in-person or virtual public hearings.[64]

57. Mr. Brian K. Hansen submitted a public hearing comment on April 9, 2026, stating that he is a participating landowner in the Project Area and supports the proposed Big Bend and Great River Energy 161-kV transmission line extension in Martin County. He explains that he has been actively engaged with Big Bend during route development and emphasized his preference that transmission line poles be located along existing road right-of-way to minimize impacts to his farming operations. Mr. Hansen noted that an early routing option along the northern edge of one of his parcels—similar to an alternative suggested by another commenter—was not acceptable to him, and that he instead strongly favored a route farther south along 220th Avenue. He affirms that the route ultimately proposed in the permit application aligns with his preference and has his full support. Mr. Hansen also noted that he has family members buried at the Cedar Lutheran Cemetery and states that he has no objection to the transmission line being routed around the cemetery.[65]

58. The DNR filed public hearing comments on the Project on April 20, 2026. In its public hearing comments, the DNR stated that it had reviewed the route permit application for the proposed Project and confirmed the agency's concurrence with the draft route permit language. The DNR indicated that it has no additional comments or recommendations beyond those already reflected in the draft permit and expressed appreciation for the opportunity to provide input on the construction and operation of the Project.[66]

V. ROUTES EVALUATED FOR PROJECT

A. Applicants' Proposed Route

59. The proposed the transmission line departs from the previously permitted route at Structure 144 which is east of 40th Avenue, south of 240th Street and north of 230th Street,

[63] Anderson Direct at 11.
[64] *See generally* Windom 6:00 P.M. Public Hearing Transcript (April 7, 2026) (Windom 6:00 PM Pub. Hrg. Tr.) and WebEx 6:00 P.M. Public Hearing Transcript (April 8, 2026) (WebEx 6:00 P.M. Pub. Hrg. Tr.).
[65] Public Comment by Brian K. Hansen (April 9, 2026) (eDocket No. 20264-230200-01).
[66] DNR Public Hearing Comments (April 20, 2026) (eDocket No. 20264-230702-01).

approximately 9.5 miles southeast of Mountain Lake. The line then travels approximately 4.5 miles south/southwest to a new Big Bend-owned substation located adjacent to Great River Energy's existing Lakefield Junction Station.[67]

60. Big Bend requests a variable route width of 200 to 635 feet along the transmission line route and an expanded route width of up to 1,711 to 1,731 feet on Great River Energy-owned property to allow flexibility to route the 161-kV transmission line to the Step-up Substation given other existing transmission lines on the parcel.[68]

61. Big Bend anticipates constructing the new single-circuit 161-kV transmission line and structures using a design and span lengths that require a variable right-of-way. When paralleling existing road rights-of-way, Big Bend will utilize a right-of-way width of 150 feet, 50 feet wide on the roadside and 100-feet wide on the non-roadside of the alignment. Big Bend proposes to place poles on private property, approximately five to 15 feet outside of the existing road right-of-way. These pole placements allow the transmission line right-of-way to share existing road rights-of-way to the greatest extent feasible for existing overhangs and will reduce the overall size of the easement required from the private landowner along roads. Pole placement and offset distances may vary in areas such as intersections due to road design requirements and in areas of planned future road expansion. Where the transmission line is not parallel to existing road rights-of-way, Big Bend will generally utilize a right-of-way width of 100 feet. In cooperation with the affected private landowner, Big Bend is proposing an approximately 200-foot right-of-way to accommodate longer spans between structures near the Cedar Lutheran Cemetery while also minimizing transmission structure placement in the middle of agricultural fields.[69]

B. Route Alternatives Evaluated

62. Big Bend considered an Alternative Route Segment that continued along 220th Street to maximize right-of-way sharing. In addition to maximizing co-location with existing road rights-of-way, it would also minimize potential impacts on agricultural operations. Big Bend rejected Alternative Route 1 because it would cross the Cedar Lutheran Cemetery and be in close proximity to the Cedar Lutheran Church. Given the location of the cemetery adjacent to the road, locating the transmission line along the road would most likely result in conductors overhanging burial sites. After consulting with the Minnesota Office of State Archeologist (OSA) and reviewing records for the cemetery, Big Bend concluded that such a route was impracticable. Working with the adjacent landowner, Big Bend was able to develop an Application Alignment[70] that avoids the church and cemetery while keeping structure locations along field edges. Therefore, this alternative was rejected.[71]

63. Big Bend also considered an Alternative Route that parallels an existing 345-kV transmission line from the eastern end point southwest to Great River Energy's Lakefield Junction

[67] Application at 1.
[68] Application at 16.
[69] Application at 16.
[70] "Application Alignment" is the proposed alignment the proposed transmission line will follow. *See* Application at iv and 18.
[71] Application at 27.

Station to maximize co-location with existing utility rights-of-way. This Alternative Route 2 was dismissed for the following reasons: 1) it would require a 125-foot offset from the existing transmission line alignment requiring the Application Alignment to be further into agricultural fields at a staggered angle not conducive to agricultural equipment; 2) the new 161-kV transmission structures would be located at different span lengths than the existing 345-kV transmission structures, increasing the impact on farming operations; 3) it would require additional travel along the right-of-way due to its location in agricultural fields and away from road right-of-way; 4) Big Bend was unable to acquire voluntary easements from private landowners given the increased impacts on agricultural operations, and 5) routing the Project on the south side of the 345-kV transmission line would put the Project too close to existing residences (within 200 feet of farmsteads and not across a road) and too close to existing and operating wind turbines (within 500 feet). Therefore, this alternative was rejected.[72]

VI. FACTORS FOR A ROUTE PERMIT

64. The Minnesota Energy Infrastructure Permitting Act (MEIPA) provides that no person may construct a HVTL without a route permit from the Commission.[73] Under the statute, an HVTL includes a transmission line that is 100-kV or more and is greater than 1,500 feet in length.[74] The proposed 161-kV Transmission Line is an HVTL greater than 1,500 feet in length and, therefore, a route permit is required from the Commission prior to construction.[75]

65. MEIPA, or Minn. Stat. Ch. 216I, requires that route permit determinations be "(1) be guided by the state's goals to conserve resources; (2) minimize environmental impacts, and minimize human settlement and other land use conflicts; (3) consider impacts to environmental justice areas, as defined in section 216B.1691, subdivision 1, paragraph (e), including cumulative impacts, as defined in section 116.065, to environmental justice areas; and (4) ensure the state's energy security through efficient, cost-effective energy supply and infrastructure."[76]

66. Under the MEIPA, the Commission must be guided by the following responsibilities, procedures, and considerations:

> (1) evaluating research and investigations relating to: (i) large energy infrastructure facilities' effects on land, water, and air resources; and (ii) the effects water and air discharges and electric and magnetic fields resulting from large energy infrastructure facilities have on public health and welfare, vegetation, animals, materials, and aesthetic values, including baseline studies, predictive modeling, and evaluating new or improved methods to minimize adverse impacts of water and air discharges and other matters

[72] Application at 27.
[73] Minn. Stat. § 216I.05, subd. 3.
[74] Minn. Stat. § 216I.02, subd. 8.
[75] Application at 10.
[76] Minn. Stat. § 216I.05, subd. 11(a).

pertaining to large energy infrastructure facilities' effects on the water and air environment;

(2) conducting environmental evaluation of sites and routes that are proposed for future development and expansion, and the relationship of proposed sites and routes for future development and expansion to Minnesota's land, water, air, and human resources;

(3) evaluating the effects of measures designed to minimize adverse environmental effects;

(4) evaluating the potential for beneficial uses of waste energy from proposed large electric power generating plants;

(5) analyzing the direct and indirect economic impact of proposed sites and routes, including but not limited to productive agricultural land lost or impaired;

(6) evaluating adverse direct and indirect environmental effects that are unavoidable should the proposed site and route be accepted;

(7) evaluating alternatives to the applicant's proposed site or route, if applicable;

(8) when appropriate, evaluating potential routes that would use or parallel existing railroad and highway rights-of-way;

(9) evaluating governmental survey lines and other natural division lines of agricultural land to minimize interference with agricultural operations;

(10) evaluating the future needs for large energy infrastructure facilities in the same general area as any proposed site or route;

(11) evaluating irreversible and irretrievable commitments of resources if the proposed site or route is approved;

(12) when appropriate, considering the potential impacts raised by other state and federal agencies and local entities;

(13) evaluating 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) evaluating the proposed facility's impact on socioeconomic factors; and

(15) evaluating the proposed facility's employment and economic impacts in the facility site's vicinity and throughout Minnesota, including the quantity, quality, and compensation level of construction and permanent jobs. 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.

67. In addition, Minn. Stat. § 216I.05, subd. 11(e) provides that the Commission "must make a specific finding that the commission considered locating a route for a high-voltage transmission line on an existing high-voltage transmission route and using parallel existing highway right-of-way. To the extent an existing high-voltage transmission route or parallel existing right-of-way is not used for the route, the commission must state the reasons."

68. The Commission is also governed by Minn. Stat. § 216I.05, subd. 4, which mandates consideration of the following factors when determining whether to issue a route permit for a HVTL:

(1) a description of each site or route's environmental setting;

(2) a description of the effects the facility's construction and operation has on human settlement, including but not limited to public health and safety, displacement, noise, aesthetics, socioeconomic impacts, environmental justice impacts, cultural values, recreation, and public services;

(3) a description of the facility's effects on land-based economies, including but not limited to agriculture, forestry, tourism, and mining;

(4) a description of the facility's effects on archaeological and historic resources;

(5) a description of the facility's effects on the natural environment, including effects on air and water quality resources, flora, and fauna;

(6) a description of the greenhouse gas emissions associated with constructing and operating the facility;

(7) a description of the facility's climate change resilience;

(8) a description of the facility's effects on rare and unique natural resources;

(9) a list that identifies human and natural environmental effects that are unavoidable if the facility is approved at a specific site or route; and

(10) a description of (i) measures that might be implemented to mitigate the potential human and environmental impacts identified in clauses (1) to (7), and (ii) the estimated costs of the potential mitigative measures.

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

VII. APPLICATION OF ROUTING FACTORS

A. Regions of Influence

70. Potential impacts on human and environmental resources are analyzed within specific geographic areas called regions of influence (ROI). The ROI is the geographic area where the Project might exert some influence and is used as the basis for assessing potential impacts. The EA for the Project uses the following ROIs:

- Proposed Right-of-Way:
  - 100-foot-wide right-of-way where not co-located with existing rights-of-way; generally, 50 feet on each side of Application Alignment
  - 150-foot-wide right-of-way where co-located with road rights-of-way; generally, 50 feet on the road side of the transmission line Application Alignment and 100 feet on the non-road side of the Application Alignment
  - 200-foot-wide right-of-way along an approximately 2,100-foot segment of the Application Alignment around Cedar Lutheran Cemetery
  - Substation Development Area
- Local Vicinity: 1,000 feet on either side of the Application Alignment
- Project Area: one mile on either side of the Application Alignment
- Census Tract: census tracts crossed by the Application Alignment and substation locations[77]

[77] Application at 31-32.

71. ROIs are based on a distance from the Application Alignment and extend on both sides of the centerline.[78]

B. Environmental Setting

72. Generally, the townships within one mile of the Application Alignment are sparsely populated rural areas with farmsteads located along roads, and away from major population centers. The municipality nearest to the Project is Trimont, about 4.5 miles southeast along State Highway 4. Infrastructure is part of the landscape, including grain silos, wind turbines, transmission lines and the Great River Energy's Lakefield Junction Station—a natural gas electrical generating plant.[79]

C. Human Settlement

73. Minnesota's HVTL routing factors require consideration of the Project's effect on human settlement, including but not limited to public health and safety, displacement, noise, aesthetics, socioeconomic impacts, environmental justice impacts, cultural values, recreation, and public services.[80]

74. Human settlement in the Local Vicinity includes residences and farmsteads scattered along rural county roads. Built features include highways and county roads, grain silos, transmission lines and wind turbines. Wind turbines are the tallest and most visible features on the landscape. The Project is routed through the Trimont Area Wind Farm, which consists of 67 turbines that are 125.6 meters (412 feet) tall. While the Trimont Area Wind Farm is the dominant visual element on the landscape, the existing Great River Energy Lakefield Junction Station and existing 345-kV transmission lines are also prominent visual features.[81]

i. Aesthetics

75. The topography along the Proposed Route is generally flat and the vegetation cover is uniformly low, except for windbreak areas near homes and farmsteads, making the topography vulnerable to visual disruptions. Viewsheds in this area are broad with small, scattered areas defined by trees or topography, but interrupted by existing infrastructure.[82]

76. One residence is located within 150 feet of the Application Alignment.[83]

77. The Project will alter the current viewshed through construction of the transmission line. Seventy- to 120-foot poles as well as conductors and an optical ground wire will be added to the landscape. Views of the transmission line will generally be screened at residences due to the existence of existing windbreaks and outbuildings, for example, sheds and barns. Nevertheless, the transmission line will be visible along township roads, in fields, and other locations within the

[78] Application at 31-32.
[79] Application at 33.
[80] Minn. Stat. § 216I.05, subd. 4(2).
[81] Application at 33.
[82] Application at 34.
[83] Application at 34.

Local Vicinity. Because there is other existing infrastructure within one mile of the Project, including wind turbines and other transmission lines which are taller than the proposed Project, potential impacts associated with the new transmission line are expected to be incremental and minimal.[84]

78. Construction of the substations within an existing industrial area will cause incremental and minimal impacts to an already industrialized area due to the presence of the existing substation facility and the existing natural gas turbines.[85]

79. Big Bend has minimized aesthetic impacts by choosing an Application Alignment that follows road right-of-way except where it deviates to avoid the Cedar Lutheran Cemetery. Other measures include avoiding structure placement directly in front of residences and using construction methods that minimize damage to vegetation near the transmission line to the greatest extent possible. The substations will be lit with down-shielded lighting. Constructing substations within an existing industrial area also mitigates potential impacts.[86]

80. At the April 7, 2026, in-person public hearing, Big Bend announced that it had executed a screening agreement with the Cedar Lutheran Cemetery to help mitigate the visual impacts of routing the transmission line around the cemetery's parcel.[87]

81. The Draft Route Permit contains conditions related to aesthetics in Section 5.3.7. These conditions include considering landowner input when placing structures and preserving the natural landscape to the extent possible by not unnecessarily destroying the natural surroundings. Additionally, transmission structures shall be placed to minimize the loss of agricultural land, forests and wetlands, and to avoid homes and farmsteads, among other conditions. Many other provisions in the Draft Route Permit also indirectly mitigate aesthetic impacts. For example, Section 5.3.10 Vegetation Management requires Big Bend to minimize the number of trees removed and to preserve windbreaks to the maximum extent practicable. General conditions can also mitigate aesthetic impacts, such as Section 5.3.18 Restoration and 5.3.19 Cleanup.[88]

ii. Cultural Values

82. The Project is in Cedar Township, a rural portion of Martin County. The communities within Martin County primarily have cultural values tied to agricultural production, light industry, and recreational activities such as hunting and fishing. Farm-related businesses play an important role in the regional economy, and the area has a diversified agricultural mix of crops and livestock production.[89]

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[84] Application at 35.
[85] Application at 35.
[86] Application at 35.
[87] *See* Windom 6:00 P.M. Pub. Hrg. Tr. at 12:7-12.
[88] Application at 35.
[89] Application at 36.

83. The Jeffers Petroglyphs Historic Site, a culturally important site for many Tribes, is over 20 miles northwest of Lakefield Junction Station. The Project will not be visible from the petroglyphs.[90]

84. The ROI[91] for cultural values is Martin County. Potential impacts on cultural values are not anticipated. The Project will not interfere with the work and leisure pursuits of residents. Mitigation is not proposed.[92]

85. The presence of the Project will have negligible impacts on land use activities within the Local Vicinity. Agricultural practices will be allowed to continue within the right-of-way after construction of the Project is complete. Substations are located on Great River Energy-owned property that is not used for agricultural production. The existing work and leisure pursuits in the Project Area are not expected to change because of construction of the Project. For example, the Project will not impact access to public hunting or fishing areas; therefore, impacts on recreational fishing or hunting are not anticipated.[93]

86. Big Bend will work with landowners to minimize disruptions to agricultural operations during construction of the transmission line to the extent possible. Because impacts on cultural values are not anticipated, no mitigative measures specific to cultural values are proposed.[94]

87. As aforementioned, Big Bend rejected an alternative route segment because it would cross the Cedar Lutheran Cemetery and be in close proximity to the Cedar Lutheran Church. After consulting with the Minnesota OSA and reviewing records for the cemetery, Big Bend concluded that such a route was impracticable.[95]

88. There are no conditions in the Draft Route Permit that address cultural values. No additional mitigation is proposed.[96]

iii. Displacement

89. The ROI for displacement is the Proposed Right-of-Way.[97]

90. The Application Alignment crosses a rural area that is primarily used for agricultural and energy production. There are no residences or buildings located within the

[90] Application at 36.
[91] The ROI is the geographic area where the project might exert some influence and is used as the basis for assessing potential impacts. ROIs vary by resource.
[92] Application at 37.
[93] Application at 37.
[94] Application at 37.
[95] Application at 37.
[96] Application at 37.
[97] Application at 38.

Proposed Right-of-Way. The Applicants will site substations on property already owned by Great River Energy. As such, displacement will not occur. [98]

91. To limit proximity to residences and other buildings, Big Bend designed a route and alignment that is co-located with existing roadways. If a residence is present, Big Bend avoided it by routing the Application Alignment across the road from the residence. Because no homes or buildings are within the Proposed Right-of-Way, no additional mitigation is proposed.[99]

92. Section 5.5.1 of the Draft Route Permit requires Big Bend to design the Project to meet or exceed all relevant local and state codes, and the NESC and NERC requirements including standards relating to clearance to buildings.[100]

iv. Electronic Interference

93. Corona, which is the manifestation of energy loss along the transmission line, as well as spark discharge, from transmission line conductors can generate electromagnetic "noise" at the same frequencies that some radio, television, cellular, and GPS signals are transmitted. Electromagnetic noise can interfere with the reception of these signals, depending on the frequency and overall strength of the signal. Line of sight communication signals could also be blocked by a structure also referred to as shadowing.[101]

94. There are numerous AM and FM radio broadcasting stations such as KNSW (91.7 FM), KKCK (94.7 FM), KUSQ (95.1 FM), KBEW (98.1 FM), KUXX (105.7 FM), KWOA (730 AM), KNUJ (860 AM), KKOJ (1190 AM), and KMHL (1400 AM) that operate or can be heard near the Project. AM radio operates at frequencies between 530 kilohertz to 1.6 megahertz (MHz), while FM radio operates at frequencies between 88.1 and 107.9 MHz. There are no communication towers, including AM radio towers, within the Project Area.[102]

95. There are more than 30 digital channels broadcast in and around the Project; these channels would be received from cities including Redwood Falls, Mankato, Jackson, and Worthington, Minnesota.[103]

96. Several cellular phone service providers operate in the vicinity of the Project, including large carriers like Verizon, AT&T, Sprint, T-Mobile, Virgin Mobile, Boost Mobile, Cricket, Straight Talk, and Republic Wireless.[104]

97. The ROI for electrical interference is the Local Vicinity. Impacts on radio, television, cellular phones, or GPS units are not expected from construction or operation of the

[98] Application at 38.
[99] Application at 38.
[100] Application at 38.
[101] Application at 38.
[102] Application at 38.
[103] Application at 38.
[104] Application at 39.

Project. Should they occur, impacts will be of a small size, short term, not affect a unique resource and can be mitigated.[105]

98. AM radio frequencies are most commonly affected by corona-generated noise. AM radio frequency interference typically occurs immediately under a transmission line and dissipates rapidly within the right-of-way to either side.[106]

99. Television broadcast frequencies are typically high enough that they are not affected by corona generated noise. In particular, digital and satellite television transmissions are not affected by corona-generated noise because they are dependent on packets of binary information or transmitted in the Ku band of radio frequencies (12,000-18,000 MHz), respectively. Digital and satellite transmissions are more likely to be affected by multi-path reflections (shadowing) generated by line-of-sight interference from a transmission line structure should the location of the structure come between the transmission and the receiver. Interference to digital and satellite signals because of the Project is not anticipated.[107]

100. Cellular phone signals use an ultra-high frequency, generally around 900 MHz, which is significantly higher than the range of electromagnetic noise generated by transmission line conductors. GPS signals also operate at a higher frequency, within the range of 1,225 to 1,575 MHz Because both cellular phone signals and GPS operate at frequencies outside the range of electromagnetic noise generated by transmission line conductors, the risk of interference is negligible.[108]

101. If radio interference from transmission line corona does occur, satisfactory reception from AM radio stations previously providing good reception can be restored by appropriate modification of (or addition to) the receiving antenna system. Interference from a spark discharge source along the transmission line can be found and corrected.[109]

102. The use of shielded coaxial cable for cable television transmittals generally makes them insusceptible to interference from electromagnetic noise. If interference to digital and satellite signals were to occur from shadowing, such interference can be mitigated by use of an outdoor antenna to improve digital signals or by moving the affected satellite antenna to a slightly different location.[110]

103. Section 5.4.3 of the Draft Route Permit addresses electrical interference. "If interference with radio or television, satellite, wireless internet, GPS-based agriculture navigation systems or other communication devices is caused by the presence or operation of the Transmission Facility, the Permittee shall take whatever action is necessary to restore or provide

[105] Application at 39.
[106] Application at 39.
[107] Application at 39.
[108] Application at 39.
[109] Application at 39.
[110] Application at 39-40.

reception equivalent to reception levels in the immediate area just prior to the construction of the Transmission Facility."[111]

v. Environmental Justice

104. Minn. Stat. § 216B.1691, subd. 1(e), defines "environmental justice" as "an area in Minnesota that, based on the most recent data published by the United States Census Bureau, meets one or more of the following criteria: (1) 40 percent or more of the area's total population is nonwhite; (2) 35 percent or more of households in the area have an income that is at or below 200 percent of the federal poverty level; (3) 40 percent or more of the area's residents over the age of five have limited English proficiency; or (4) the area is located within Indian country, as defined in United State Code, title 18, section 1151."[112]

105. The ROI for Environmental Justice is the census tract crossed by the Project.[113]

106. The Project is in Census Tract 7901 Block Group 1. This census tract includes the northern quarter of Martin County.[114]

107. The Applicants reviewed the Minnesota Pollution Control Agency (MPCA) What's in My Neighborhood database. This database shows potentially contaminated sites and an inventory of businesses that have applied for environmental permits and registrations from the agency. Just because a site is listed in the database does not necessarily imply a threat to the environment. Thirteen sites are within the Local Vicinity, including: four feedlots, two construction stormwater sites, one industrial wastewater site. Lakefield Junction Station is associated with multiple sites, including aboveground tanks, air quality, hazardous waste, minimal quantity generator, and industrial stormwater and wastewater.[115]

108. According to the MPCA MNRISKS model and shown on the MPCA Map of Environmental Justice Areas web viewer, Census Tract 7901 Block Group 1 has an air score of 0.10. This means the air scores in the census tract are in the lowest 20 percent of air scores in Minnesota and the air quality is better than 80 percent of the state. Additionally, air scores are below health benchmarks. A health benchmark is "an amount of air pollution that is unlikely to result in health effects in sensitive populations after a lifetime of exposure." According to the MPCA, contributing emission sources in the census tract include agriculture and farm equipment (66 percent of emissions), permitted facilities (22 percent of emissions) and recreational vehicles and boating (2 percent of emissions).[116]

109. There are no statutorily defined environmental justice communities crossed by the Project. No mitigation is proposed. [117]

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[111] Application at 40.
[112] Application at 40.
[113] Application at 42.
[114] Application at 40.
[115] Application at 41.
[116] Application at 41-42.
[117] Application at 42.

vi. Land Use and Zoning

110. The Project lies within the Martin County Agriculture District though portions of the transmission line would be within the Shoreland District along Cedar Creek, specifically Shoreland Special Protection—SL-1.[118]

111. The ROI for land use and zoning is the Project Area. Potential impacts are anticipated to be both short and long term but minimal.[119]

112. Construction and operation of the Project is not expected to impact current land use or future growth in Martin County. However, existing land uses along the Application Alignment will experience short-term impacts during construction. Potential impacts can be mitigated through easement agreements.[120]

113. No long-term impacts are anticipated from the Project, however, mitigation efforts will still take place. Big Bend sited the Application Alignment along road rights-of-way for most of its length to minimize impacts on non-developed areas. When transmission line construction is complete, Big Bend will restore the right-of-way and land uses will be allowed to continue as before with limited exceptions. No additional mitigation measures are proposed.[121]

114. No areas zoned as residential, commercial or industrial are crossed by the Application Alignment. Based on Big Bend's review of the zoning information, the likelihood of future residential, commercial, or industrial development within the Proposed Route is low. Should future industrial development occur, it would likely occur on the property owned by Great River Energy.[122]

115. Based on preliminary design, up to four transmission line poles might be placed within the SL-1 District. Cedar Creek meanders on both sides of 220th Avenue along the Application Alignment. Because Big Bend is maximizing co-location with existing road right-of-way as well as routing the transmission line to avoid impacts on agricultural production, pole placement within the SL-1 District is unavoidable. Given the purpose of the SL-1 District to ensure sparse development for urban expansion areas until annexation and city services are available, potential impacts to Martin County zoning are not anticipated.[123]

116. Big Bend has routed the transmission line through predominately agricultural areas and has sited transmission structures in coordination with landowners to minimize impacts to their agricultural operations. Big Bend has minimized structure placement in the SL-1 district to the extent practicable. Furthermore, structures within the SL-1 district are prioritized on existing row cropped areas. No additional mitigation measures are proposed.[124]

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[118] Application at 44.
[119]
[120] Application at 47.
[121] Application at 47.
[122] Application at 47.
[123] Application at 47.
[124] Application at 48.

vii. Noise

117. A transmission line can generate a small amount of sound due to corona activity. Corona is the manifestation of energy loss along the transmission line, and this energy loss can produce sound, such as buzzing or crackling. This noise can be greater in rainy or foggy conditions. During heavy rains, the sound of the rain is generally greater than the noise emitted from the transmission line and thus the transmission line noise is not noticeable. Corona noise levels are low until the transmission line operating voltage exceeds 345- to 500-kV.[125]

118. Substation noise may result from the transformers, which is perceived as a humming sound. Transformers and transmission lines are equipped with circuit breakers which open to de-energize the transformers and transmission lines for fault conditions and for maintenance. Circuit breakers are rarely opened and closed, at which time there is sound associated with the mechanical operation of the breakers. Substation circuit breakers do not emit a humming sound during normal operation.[126]

119. The MPCA has promulgated noise standards in Minn. R. ch. 7030. Noise standards are not dictated by local zoning. Instead, noise standards are based on noise area classifications (NAC) determined at the location of the person who hears the noise. Residences are in the most restrictive NAC and are classified as NAC 1, business areas are classified as NAC 2, and industrial/agricultural areas are classified as NAC 3. A fourth area, NAC 4, is defined as undeveloped and unused land, but no noise standards apply to this land class. The noise standards specify the maximum allowable noise levels at a receptor and cannot be exceeded for more than 10 percent of an hour (L10) or 50 percent of an hour (L50).[127]

120. The ROI for noise is the Local Vicinity. Construction-related impacts are expected to be short term and minimal. Operational impacts are anticipated to be of a small size, long term, and not impact unique resources. Potential impacts will be negligible to minimal.[128]

121. The Project is in a rural area. Ambient noise levels in these locations are generally between 35 and 40 A-weighted decibel (dBA) during daytime hours. Ambient noise levels will increase sporadically with passing vehicle traffic, high winds, or use of farm equipment, all-terrain vehicles, or snowmobiles. The primary noise receptors within the Local Vicinity are residences and farmsteads.[129]

122. Construction of the transmission line is expected to cause minimal, short-term noise impacts. Big Bend will minimize these unavoidable impacts to the extent possible. Noise impacts related to substation construction will be similar, except that, due to the location of these facilities, potential impacts are anticipated to be negligible to minimal.[130]

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[125] Application at 48.
[126] Application at 48.
[127] Application at 48.
[128] Application at 49.
[129] Application at 49.
[130] Application at 49.

123. Vehicles and equipment will emit noise during construction. The amount of noise will vary depending on the type of activity occurring. Noise-producing activities are associated with clearing, grading (at substation locations, if necessary along the transmission line), material delivery, auguring foundation holes, setting foundations and structures, stringing conductors, and installing substation equipment. Noise from heavy equipment and increased vehicle traffic will be intermittent and will occur during daytime hours.[131]

124. Along the transmission line, construction activity would be present at a particular location for a few days, but on multiple occasions throughout the period between right-of-way clearing and restoration. As a result, construction noise will be highly intermittent in discrete locations. Noise from construction of the substations will be concentrated at the Substation Development Area. The closest residence is about 0.75 miles to the south. Construction will typically occur between 7 a.m. and 7 p.m. Monday through Friday.[132]

125. The Draft Route Permit, Section 5.3.6 Noise, requires compliance, "with noise standards established under [Minn. R.] 7030.0100 to 7030.0080. The Permittee shall limit construction and maintenance activities to daytime working hours to the extent practicable". Big Bend and Great River Energy will use sound-control devices on vehicles and equipment (mufflers), will comply with noise standards, will conduct construction activities during daylight hours, and will not run vehicles and equipment unnecessarily.[133]

126. During fair conditions, noise from the transmission line is anticipated to be inaudible. The transmission line may produce noise during rainy conditions due to the corona effect, a type of electrical conduction that occurs in the atmosphere near the conductor that may result in an audible hissing and cracking sound. It is likely, however, that most of the time when climatic conditions result in corona, the noise levels of falling rain would exceed the corona noise making the transmission line inaudible. Given the distance and existing natural gas turbines, substation noise will also be inaudible at the closest residence.[134]

127. The Draft Route Permit, Section 5.3.6 Noise, requires compliance, "with noise standards established under [Minn. R.] 7030.0100 to 7030.0080. The Permittee shall limit construction and maintenance activities to daytime working hours to the extent practicable." The Applicants will comply with the noise standards and will limit maintenance activities to daytime working hours to the extent practicable.[135]

viii. Public Services

1) Water and Wastewater Services

128. Based on the Minnesota Department of Health's (MDH) Source Water Protection Web Map Viewer, most rural residences in Martin County are supplied with water by wells and

[131] Application at 50.
[132] Application at 50.
[133] Application at 50.
[134] Application at 52.
[135] Application at 52.

are assumed to have private septic systems or drain fields. The closest wellhead protection area is southwest of Trimont.[136]

129. The Project does not cross any domestic wells. Based on a review of aerial imagery, the Proposed Right-of-Way is distant from homes and does not overtake septic systems. According to the Department of Health, Drinking Water Protection Section, there are no drinking water supply management areas within the Route.[137]

2) Utilities

130. South Central Electric Association provides local distribution electrical service and Minnesota Energy Resources provides natural gas service in that portion of Martin County occupied by the Project. The Project is routed through the Trimont Area Wind Farm. An existing 345-kV transmission line and Lakefield Junction Station are within the Local Vicinity for portions of the transmission line route as well as the new Substation Area. Review of the National Pipeline Mapping System indicates there is a natural gas transmission pipeline near the Project that feeds Lakefield Junction Station. The Application Alignment does not cross the pipeline.[138]

131. No impacts to existing distribution lines are expected. The transmission line will cross the existing 345-kV transmission line before reaching the Step-Up Substation. Big Bend will coordinate with Xcel Energy when crossing the existing 345-kV transmission line. Based on preliminary design, Big Bend plans to cross under this 345-kV line at a perpendicular angle on the Great River Energy-owned parcel. Big Bend and Great River Energy will also coordinate when constructing and interconnecting the Step-up and Interconnection Substations. Should an outage at the existing Lakefield Generating Substation be necessary, Great River Energy will coordinate with MISO and NERC to address any impacts to the electrical grid.[139]

132. Should outages be necessary along existing distribution lines, Big Bend and Great River Energy will coordinate with South Central Electric Association.[140]

3) Other Public Services

133. Other public services within Martin County are located primarily within municipalities. For example, public works and utility departments design, build, and maintain streets and sidewalks, sanitary sewers, water mains, and public landscaping. These occur within the Local Vicinity.[141]

134. The ROI for public services is the Project Area. Generally, potential impacts are anticipated to be minimal, of a small size, not effect a unique resource and can be mitigated.[142]

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[136] Application at 52.
[137] Application at 53.
[138] Application at 52-53.
[139] Application at 53.
[140] Application at 54.
[141] Application at 53.
[142] Application at 53.

135. Prior to any land disturbance activities, the Big Bend and Great River Energy will locate and mark underground utilities using the Gopher State One-Call system. If the Applicants need to cross an underground utility or other underground infrastructure with heavy equipment, they will employ best management practices (BMPs), such as construction matting, to protect the infrastructure if necessary. No additional mitigation is proposed.[143]

ix. Recreation

136. Recreational opportunities in Martin County include fishing, boating, water sports, swimming, biking, bird watching, hiking, hunting and snowmobiling among other activities. There are no state lands within the Local Vicinity of the Project including state parks, state forests, state trails, wildlife management areas, aquatic management areas, or scientific and natural areas. No federal or county parks, or federal forests or refuges are within the Local Vicinity. There are no mapped snowmobile trails in the Local Vicinity; however, snowmobiling might occur along road ditches. Recreational activities in the Local Vicinity of the Project occur on private lands.[144]

137. The ROI for recreation is the Local Vicinity. Potential impacts are anticipated to be short and long term, of a small size, and not affect unique resources. Overall, potential impacts are anticipated to be minimal. Should impacts occur, they would be mostly associated with construction activities. Potential impacts can be mitigated.[145]

138. Construction of the Project will not affect public access to nearby recreational opportunities. Moreover, construction is not anticipated to limit recreational opportunities on private land. The Substation Development Area is located on Great River Energy-owned property.[146]

139. Temporary disruptions to snowmobile use along road ditches could occur if construction of the transmission line occurs during the winter months and there is adequate snow cover. Given there are no designated snowmobile trails in the area, users would be expected to use the ditch on the opposite side of the roadway. Any disruptions would be minimal, short term, and would resolve with the completion of construction.[147]

140. If construction occurs during an open hunting season, the increased activity could temporarily disturb wildlife and change movement patterns, indirectly affecting hunting activities. However, given the extent of agricultural activity and the prevalence of habitat in the Local Vicinity, wildlife such as deer and upland game birds would not be expected to relocate.[148]

141. Long term impacts include aesthetic changes to the landscape that might be visible to individuals recreating on private lands. Given the extent of electrical infrastructure already

[143] Application at 54.
[144] Application at 54.
[145] Application at 54.
[146] Application at 55.
[147] Application at 55.
[148] Application at 55.

present, including the Trimont Wind Farm, any impact to recreational activities would be incremental and negligible.[149]

142. There are no conditions in the Draft Route Permit that specifically address recreation. However, mitigating direct impacts to certain resources also mitigates indirect impacts to recreational resources.[150]

143. The Draft Route Permit contains conditions related to aesthetics in Section 5.3.7. These conditions include considering landowner input when placing structures and preserving the natural landscape to the extent possible by not unnecessarily destroying the natural surroundings. Additionally, transmission structures shall be placed to minimize the loss of agricultural land, forests and wetlands, and to avoid homes and farmsteads, among other conditions. Many other provisions in the Draft Route Permit also indirectly mitigate aesthetic impacts. For example, Section 5.3.10 Vegetation Management requires Big Bend to minimize the number of trees removed and to preserve windbreaks to the maximum extent practicable. General conditions can also mitigate aesthetic impacts, such as Section 5.3.18 Restoration and 5.3.19 Cleanup.[151]

x. Socioeconomic

144. The ROI for socioeconomics is Martin County.[152]

145. Martin County has a very small population compared to the State of Minnesota as a whole, comprising less than one-tenth of Minnesota's total population. In Martin County the percentage of persons who identify as white only, not Hispanic or Latino, is higher than the state level. According to the United States Census Bureau, the top three industries of employment in the State of Minnesota are education, health, and social services at 26.1 percent, manufacturing at 12.8 percent, and retail trade at 11 percent.[153]

146. Potential impacts are anticipated to be short term, of a small size, and not affect a unique resource. Impacts are expected to be positive. Mitigation is not proposed.[154]

147. Construction of the Project would have minimal, short-term impacts on the existing socioeconomic conditions in Martin County. The Project would not result in long-term or significant changes in the population size or demographics, or significantly affect employment or income. Construction and operation of the Project is not anticipated to create or remove jobs or result in the permanent relocation of individuals to or from the area.[155]

148. The communities near the Project will likely experience short-term positive economic impacts related to the increase in expenditures during construction. Construction of the Project would take approximately nine months, and the construction workforce would be

[149] Application at 55.
[150] Application at 55.
[151] Application at 55.
[152] Application at 56.
[153] Application at 56.
[154] Application at 56.
[155] Application at 56.

approximately 50 workers. Construction personnel would likely commute to the Project on a daily or weekly basis instead of relocating to the area. The influx of additional construction personnel in the area will have a small positive impact on the local economy from construction crew expenditures in the local community (for example, lodging, fuel, food). Construction materials (for example, lumber, concrete, aggregate) might be purchased from local vendors when feasible.[156]

149. No additional permanent staff will be necessary for operation and maintenance of the Project. Therefore, the Project is not expected to have a long-term effect on population trends, economic conditions, or employment. However, the Project will have a long-term beneficial impact on the local tax base from the incremental increase in revenues generated by utility property taxes.[157]

150. As the overall socioeconomic impact of the Project is anticipated to be positive, no mitigation is proposed. Section 9.5 of the Draft Route Permit requires permittees, its contractors, and subcontractors to pay no less than the prevailing wage rate as defined in Minn. Stat. § 177.42. Additionally, these entities are subject to the requirements and enforcement provisions under Minn. Stat. §§ 177.27, 177.30, 177.32, 177.41 to 177.435, and 177.45.[158]

151. Property value impacts from transmission lines are difficult to measure because of the multiple factors that can impact a property's value. While potential impacts vary, HVTLs generally have "no significant impact or a slight negative impact on residential properties."[159]

152. Impacts from HVTLs on property values depend upon many factors, including market condition, location, and personal preference. The presence of a HVTL becomes one of many interacting factors that could affect a specific property value.[160]

153. The ROI for property values is the Local Vicinity. Impacts to property values could occur; however, specific changes to a property's value are difficult to predict. Impacts, if they occur, are expected to decrease over time. Property value impacts fall off rapidly with distance; therefore, impacts are anticipated to be localized. Long-term impacts might or might not occur.[161]

154. The Draft Route Permit contains a number of conditions, including Conditions 5.3.7 (Aesthetics), 5.3.10 (Vegetation Management), 5.3.8 (Soil Erosion and Sediment Control) and Section 5.3.19 (Cleanup) that may help mitigate aesthetic impacts and future land use encumbrances, which may mitigate potential property values impacts.

xi. Transportation

[156] Application at 56-57.
[157] Application at 57.
[158] Application at 57.
[159] Application at 55.
[160] Supplemental Completeness Comments (December 29, 2025) at 2 (eDockets ID 202512-226243-01) (internal citations omitted).
[161] Supplemental Completeness Comments (December 29, 2025) at 2 (eDockets ID 202512-226243-01).

155. The Project follows and crosses township and county roads. These roads are graveled; not paved.[162]

156. The Application Alignment does not cross a railroad. The nearest railroad is over three miles east of the Project at its closest point.[163]

157. There are no public-use airports or heliports operating within one mile of the Project. No private air strips were identified within one mile of the Application Alignment.[164]

158. The ROI for transportation is the Proposed Right-of-Way, except for airports, which is the Project Area. Potential impacts are associated with construction of the Project. Impacts are anticipated to be short term, of a small size, and not affect a unique resource. Potential impacts can be mitigated.[165]

159. Construction of the Project could create minor traffic increases along local roadways from construction vehicles and material and equipment delivery. This increase would be temporary and traffic volumes would return to normal after construction activities are complete.[166]

160. Temporary road or lane closures could occur during construction to ensure the safety of construction crews and the traveling public. Temporary closings would be communicated in advance and might cause traffic delays given the need to detour traffic.[167]

161. After the completion of construction, the Applicants will ensure that county and township roads used during construction are returned to pre-construction conditions. The Applicants will meet with township road supervisors or county highway departments to address any issues that arise during construction with roadways to ensure the roads are adequately restored, if necessary, after construction is complete.[168]

162. Section 5.3.14 of the Draft Route Permit addresses public roads. The Applicants will be required to notify road authorities of the roads that will be used during construction of the Project as well as acquire all necessary permits for oversize or overweight loads. The Applicants are also required to promptly repair any damage to roads, among other provisions.[169]

163. There are no railroads within the Proposed Right-of-Way. Impacts will not occur and no mitigation is proposed.[170]

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[162] Application at 57.
[163] Application at 57.
[164] Application at 57.
[165] Application at 58.
[166] Application at 59.
[167] Application at 59.
[168] Application at 59.
[169] Application at 59.
[170] Application at 59.

164. There are no airports within the Project Area. Impacts will not occur and no mitigation is proposed.[171]

D. Public Health and Safety

165. Minnesota's HVTL routing factors require consideration of the Project's potential effect on health and safety.[172]

i. Electric and Magnetic Fields

166. Electric fields and magnetic fields (EMF) arise from the electrical potential (voltage) and the movement of an electrical charge (current) associated with the transmission and use of electricity.[173]

167. Although there is no state or federal standard for transmission line electric field exposures, the EQB developed a standard of a maximum electric field limit of 8-kV/m at one meter (3.28 feet) above ground; this standard has been regularly applied by the Commission.[174]

168. The Applicants referred to MPUC Docket TL-23-388 for estimated magnetic field strengths. The table below summarizes the magnetic fields calculated for that proposed transmission line configuration with power flow at historic average loading, historic peak loading, and the electrical limit for the transmission line. The maximum magnetic field at the electrical limit is 199.06 milligauss (mG). Magnetic field strengths would be lower than 80 mG at the edge of the 100-foot right-of-way, which is well below the Minnesota recognized standards.[175]

Table 1

TL-23-388 Historic and Estimated Magnetic Fields (mG)

Voltage	Line Current (Amperes)	Magnetic Field (mG) at Distance (ft) from Proposed Alignment						
		-100	-50	-25	Max	25	50	100
161-kV Average Load	541	6.33	17.32	30.83	43.67	34.62	19.43	6.85
161-kV Historic Peak	1,115	13.16	36.38	65.64	94.17	74.02	40.91	14.23

[171] Application at 59.
[172] Minn. Stat. § 216I.05, subd. 4(a)(2).
[173] Application at 59.
[174] Application at 60.
[175] Application at 61.

161-kV Electrical Limit	2,000	24.22	69.66	132.10	199.06	151.31	78.83	78.83

169. The ROI for EMF is the Proposed Right-of-Way. As mentioned above, the levels of EMF from the Project are below acceptable Minnesota limits for EMF.[176]

170. Section 5.4.2 (Electric Field) of the Draft Route Permit, requires the transmission line to be "designed, constructed, and operated in such a manner that the electric field measured one meter above ground level immediately below the transmission line shall not exceed 8.0 kV/m rms [root mean square]."[177]

171. Electric fields may interfere with a pacemaker's ability to sense normal electrical activity in the heart. However, modern "bipolar" cardiac devices are much less susceptible to interactions with electric fields. Medtronic and Guidant, manufacturers of pacemakers and other implantable medical devices, have indicated that electric fields below 7 kV/m are unlikely to cause interactions affecting operation of most of their devices. The electric fields for the Project are well below levels at which modern bipolar devices are susceptible to interaction with the fields. In the unlikely event that a pacemaker is impacted, the effect is typically a temporary asynchronous pacing (commonly referred to as reversion mode or fixed rate pacing). The pacemaker will return to its normal operation when the person moves away from the source of the interference.[178]

ii. Emergency Services

172. Public emergency services within the County are provided by local law enforcement and emergency response agencies located in nearby communities. The Martin County Sheriff's Office provides law enforcement to communities near the Project. Fire service is provided by the Trimont Fire Department. Ambulance response is provided by regional and local ambulance services. The city of Trimont provides ambulance services. Trimont is less than 10 miles from Lakefield Junction Station by road.[179]

173. Nearby hospitals include Windom Area Health in Windom (Cottonwood County), the Sanford Jackson Medical Center in Jackson (Jackson County) and the Fairmont Medical Center in Fairmont (Martin County). Smaller medical clinics or medical centers in the area include Sanford Health Mountain Lake Clinic in Mountain Lake, Mayo Clinic Health System in St. James and Fairmont, and various eye clinics, dental offices, and chiropractors.[180]

174. Temporary road or lane closures during construction could slow emergency response.[181]

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[176] Application at 61.
[177] Application at 62.
[178] Application at 63.
[179] Application at 63.
[180] Application at 63.
[181] Application at 64.

175. The Allied Radio Matrix for Emergency Response (ARMER) system is a radio communication system that is utilized by first responders across Minnesota.[182] Broadcast frequencies are above 700 MHz. Radio frequency noise, should it occur, would be below this range; therefore, the ARMER system will not be impacted. ARMER towers vary in height but are generally over 330 feet tall. As such, the Project is not expected to cause line-of-sight concerns.[183]

176. The ROI for emergency services is the County. Potential impacts will be short term, of a small size and minimal. Impacts can be mitigated. Long-term impacts are not anticipated.[184]

177. Big Bend will coordinate any closures and detours with emergency responders. Should an accident occur during construction, it would be handled through local ambulance services. Injured persons would be taken to the nearest hospital or clinic depending on the severity of their injury.[185]

iii. Public and Worker Safety

178. There are risks associated with construction and operation of a transmission line. Construction presents the potential for injuries such as falls and slips, equipment-use related injuries, or electrocution. Operation of a transmission line presents a potential risk to public safety if the transmission line or structures are damaged by inclement weather or by unauthorized entry to the substations. Unauthorized entry to the substations would expose the public to electrocution risks. A potential for electrocution exists should individuals approach the energized lines. Individuals can also be exposed to electrocution if they contact the transmission line from the ground whether in machinery or other means. This event is most often associated with distribution lines. Overall, construction and operation of the Project is not expected to have a negative impact on public health or safety.[186]

179. The ROI for public and worker safety is the Proposed Right-of-Way. Potential impacts are anticipated to be short- and long-term, of a small size, and can be mitigated. Overall impacts are expected to be minimal.[187]

180. As required by Section 5.5.1 of the Draft Route Permit, the Project will meet or exceed NESC standards. The substations will be equipped with protective devices (circuit breakers and relays located in substations where transmission lines terminate) to safeguard the public in the event of an accident, or if a structure or conductor falls to the ground. The protective equipment will de-energize the transmission line should such an event occur. In addition, the substations will be fenced and accessible only by authorized personnel. Signage around the substations will warn the public of the safety risks associated with the energized equipment. Substations will be fenced, gated, and locked. The Applicants or their contractor will provide or require necessary safety

[182] Application at 63.
[183] Application at 64.
[184] Application at 63.
[185] Application at 64.
[186] Application at 64-65.
[187] Application at 64.

equipment, including fall arrest equipment, and provide daily "tailgate" safety trainings. All work must comply with the Occupational Safety and Health Administration (OSHA) requirements.[188]

iv. Induced Voltage and Stray Voltage

181. The ROI for induced and stray voltage is the Proposed Right-of-Way. Potential impacts will be minimal and can be mitigated.[189]

182. To ensure the safety of people in the proximity of HVTLs, the NESC requires that any discharge be less than five milliamperes root mean square (mA rms). The Applicants would ensure that any fixed conductive object in close proximity or parallel to the Project, such as a fence or other permanent conductive fixture, would be grounded so any discharge would be less than the five mA rms NESC limit.[190]

183. Section 5.4.1 (Grounding) of the Draft Route Permit, requires that the transmission line be designed, constructed, and operated "in a manner so that the maximum induced steady-state short-circuit current shall be limited to five milliamperes root mean square (rms) alternating current between the ground and any non-stationary object within the right-of-way, including but not limited to large motor vehicles and agricultural equipment. All fixed metallic objects on or off the right-of-way, except electric fences that parallel or cross the right-of-way, shall be grounded to the extent necessary to limit the induced short-circuit current between ground and the object so as not to exceed one [mA] rms under steady state conditions of the transmission line and to comply with the ground fault conditions specified in the [NESC]." Additionally, the Applicants would be required by this section of the Draft Route Permit to "address and rectify any induced current problems that arise during transmission line operation."[191]

184. Appropriate measures, such as proper grounding, will be taken to prevent stray voltage problems. To ensure the safety of persons in the proximity of HVTLs the NESC requires that any discharge be less than five mA rms, and the eight kV/m limit ensures that this level is not exceeded. If a landowner has stray voltage concerns on their property, the Applicants suggest they contact their electric service provider to discuss the situation with technical staff, including the possibility of an on-site investigation.[192]

185. Additionally, 5.5.1 (Safety Codes and Design Requirements), requires the Applicants to "meet or exceed all relevant local and state codes, the NESC, and [NERC] requirements."[193]

E. Land-based Economies

i. Agriculture

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[188] Application at 65.
[189] Application at 65.
[190] Application at 66.
[191] Application at 66.
[192] Application at 66.
[193] Application at 66.

186. The majority of the land crossed by the transmission line is classified as cultivated cropland. The Substation Development Area is on land owned by Great River Energy and is within an industrial facility outside of agricultural production despite the National Laboratory Directors' Council (NLCD) indicating the area is pasture/hay agricultural land.[194]

187. The ROI for agriculture is the Proposed Right-of-Way. Construction of the transmission line could cause short term impacts during construction. Long term impacts will also occur; these impacts will be of a small size and not affect a unique resource. Substation construction and operation will not impact agriculture given their location within the existing Lakefield Junction Station on Great River Energy-owned property not used for agricultural production. Substation impacts will be negligible. Potential impacts can be mitigated.[195]

188. Impacts from transmission line construction would be mitigated through the proper use and installation of BMPs, such as minimizing the number of vehicles in the right-of-way, protecting topsoil, and reducing compaction, erosion, and spread of invasive plants or noxious weeds. Big Bend will coordinate with landowners or farm operators regarding construction timing. Big Bend will attempt to avoid crop losses by constructing the transmission line before spring planting or after harvest. If this is not possible, or if crop losses occur from maintenance or repair of the transmission line, Big Bend will compensate the landowner or farm operator for crop damages. Big Bend will work with landowners to identify drain tile locations. Restoration efforts will include decompacting soils and restoring temporary access modifications, as further discussed in the draft VMP.[196]

189. The Application Alignment does not cross CRP or CREP easements. However, if these easements are identified during the easement and title clearance process and final transmission line design requires structures to be placed on parcels enrolled in Conservation Reserve Program (CRP) or Conservation Reserve Enhancement Program (CREP) programs, Big Bend will work with landowners and the Farm Service Agency to address potential impacts and fully compensate landowners for lost CRP or CREP revenue resulting from the Project.[197]

190. Big Bend proposes to minimize impacts on agricultural land by placing structures along field edges, as closely as feasible (within 15 feet) from the edge of road rights-of-way or parcel lines. Furthermore, Big Bend will make reasonable efforts to work with landowners to finalize structure locations.[198]

191. Big Bend has minimized impacts to agricultural land by routing the transmission line in coordination with landowners and siting structures to minimize impacts to agricultural land. For example, the Route generally follows roads at the edge of agricultural fields. In the two instances where the route traverses fields (at the northeast portion of the Route and around the

[194] Application at 66-67.
[195] Application at 68.
[196] Application at 69.
[197] Application at 69.
[198] Application at 69.

cemetery), Big Bend is proposing longer spans to avoid structures in the middle of agricultural fields.[199]

192. The final spacing and location of structures will be designed to accommodate the movement of farm equipment within agricultural fields while still maintaining safety and design standards. Long term impacts from the placement of structures or guying can be mitigated through easement agreements.[200]

193. The Draft Route Permit addresses mitigating impacts to agricultural production. Soil and erosion control measures are required by Section 5.3.8. Section 5.3.11 requires that landowners be notified at least 14 days prior to the application of pesticides. Section 5.3.12 requires Big Bend to avoid the spread of invasive species by developing an Invasive Species Prevention Plan. Big Bend must also take "all reasonable precautions" to avoid the spread of noxious weeds as required by Section 5.3.13. Section 5.3.21 requires Big Bend to fairly restore or compensate landowners for damages, including damages to crops or drain tile.[201]

ii. Forestry

194. There are no forestry operations along the Proposed Right-of-Way. Wooded areas near the Project consist of shelter belts or wind breaks surrounding farmsteads or areas of trees near riparian areas along Cedar Creek. These areas might be used for personal use timber harvest. Big Bend made every effort to develop an Application Alignment that minimizes tree clearing. Based on the Application Alignment and associated Proposed Right-of-Way, approximate three acres would be cleared for construction and operations of the Project.[202]

195. The ROI for forestry is the Proposed Right-of-Way.[203]

196. No forestry operations are present; therefore, no impacts will occur and no mitigation is proposed.[204]

iii. Mining

197. Mining is not a major industry in Martin County. Gravel operations are found throughout the county; however, based on Minnesota Department of Transportation's (MnDOT) Aggregate Source Information System there are no gravel pits within the Proposed Right-of-Way. According to the United States Geological Service there is one prospect mine located in the Proposed Route. Review of 1991 aerial imagery in this location shows grassland but no mining operation. The area has been cultivated cropland since 2015.[205]

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[199] Application at 69.
[200] Application at 69.
[201] Application at 69-70.
[202] Application at 70.
[203] Application at 70.
[204] Application at 70.
[205] Application at 70.

198. The ROI for mining is the Proposed Right-of-Way. Potential impacts are not expected to occur; therefore, no mitigation is proposed.[206]

199. The Substation Development Area is owned by Great River Energy, and no mining operations will occur on this property. Future mining operations would be precluded from the transmission line right-of-way.[207]

iv. Tourism

200. Tourism near the Project would center around the outdoor recreational opportunities.[208]

201. The ROI for tourism is the Local Vicinity. Potential impacts are not expected to occur; therefore, no mitigation is proposed.[209]

202. Direct impacts to recreation can cause indirect impacts to tourism. Similarly, measures to mitigate direct impacts to recreation can indirectly mitigate impacts to tourism. The Applicants have minimized impacts on tourism by routing the transmission line and siting the substations to avoid public recreational areas and municipalities where tourism is most prevalent. The Project does not cross public lands or regional or community event sites. As such, impacts on tourism are not expected.[210]

F. Archaeological and Historic Resources

203. Big Bend hired Tetra Tech, Inc. to conduct a Phase Ia Literature Review for the Project. The Project Area was investigated through a review of Minnesota's Statewide Historic Inventory Portal (architectural resources and inventory forms) and through a review of the OSA Site Portal (archaeological resources, previous cultural resource investigations, and site forms). These reviews were conducted on August 26, 2025. An onsite review of previous cultural resource investigations was also conducted at the SHPO on September 2, 2025.[211]

204. No previously documented archaeological resources were identified within the Proposed Route during the file review. However, one previously documented archaeological resource (21MR0075) was identified within the Project Area. Site 21MR0075 consists of a Precontact lithic isolated find. The site is currently unevaluated for listing in the National Register of Historic Places (NRHP).[212]

205. Three previously inventoried architectural resources were identified within the Proposed Route. Two resources are currently unevaluated for listing in the NRHP, and one has been determined not eligible for listing in the NRHP. An additional 29 previously inventoried

[206] Application at 70.
[207] Application at 70.
[208] Application at 71.
[209] Application at 71.
[210] Application at 71.
[211] Application at 71.
[212] Application at 72.

architectural resources were identified within the Project Area. Of these 29 architectural resources, 26 resources are unevaluated for listing in the NRHP and three resources are not eligible for listing in the NRHP.[213]

206. Tetra Tech recommended the completion of a Phase I Archaeological Investigation for the 79 acres of unsurveyed portions of the Proposed Route, which would include a pedestrian survey and reporting on those results. Big Bend provided the Phase Ia Cultural Resources Investigation to the SHPO for review on September 22, 2025.[214] On November 14, SHPO provided comments on the report and requested certain revisions. On November 24, 2025, Big Bend re-submitted the report to SHPO with the requested edits. On November 25, 2025, SHPO acknowledge receipt of the revised report.[215] On January 9, 2026, Big Bend received a response from SHPO. In its response, SHPO commented that it reviewed the revised report and agreed with the survey recommendations. Big Bend will complete the field surveys when field conditions are appropriate in Spring 2026.[216]

207. The ROI, or area of potential effect (APE) for archaeological resources is the Proposed Right-of-Way. Impacts to archeological resources are not anticipated. Impacts to architectural resources are unavoidable but can be mitigated in part. The visual APE associated with historic resources is one-half mile from the Application Alignment, based on the height of the proposed structures. The Project's transmission line structures and conductors would create new aesthetic impacts that could detract from historic architectural structures; however, given the presence of existing electrical infrastructure any impact would be incremental and minimal.[217]

208. Big Bend will conduct field surveys within the APE, if deemed necessary based on coordination with SHPO, that could host previously unrecorded cultural resources. If archaeological or historic architectural resources that are considered potentially eligible for listing on the NRHP are identified as a result of field surveys, Big Bend will work with SHPO to identify measures to avoid, minimize or mitigate any effects to these resources. Additionally, should any Tribal Nation request to participate in field surveys, Big Bend will accommodate this request.[218]

209. If previously unidentified archaeological resources are discovered during construction, measures will be implemented in accordance with the Project's Unanticipated Discoveries Plan.[219]

210. Section 5.3.15 of the Draft Route Permit addresses impacts to archaeological and historic resources. The section requires workers to be trained about the need to avoid cultural properties and requires that every effort must be made to avoid impacts to identified archaeological and historic resources.[220]

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[213] Application at 72.
[214] Application at 72.
[215] *See* Application at 72 and Appendix E.
[216] Anderson Direct at 7:1-5.
[217] Application at 72-73.
[218] Application at 73.
[219] Application at 73.
[220] Application at 73.

G. Natural Environment

i. Air Quality

211. The ROI for Air Quality is the County. Potential impacts during construction are expected to be short-term, of a small size, and not affect a unique resource. Temporary and localized air quality impacts caused by construction vehicle emissions and fugitive dust from clearing and construction are expected to occur. Exhaust emissions from diesel equipment will vary during construction but will be minimal and temporary. The magnitude of emissions is influenced heavily by weather conditions and the specific construction activity taking place.[221]

212. Air emissions from construction equipment would include carbon dioxide, ozone (O3), particulate matter with a diameter of 2.5 micrometers (PM2.5), sulfur dioxide (SO2), nitrogen dioxide (NO2), and carbon monoxide (CO). Emissions would be dependent on weather conditions, the number and type of equipment operating at any given location, and the period of operation required for construction at that location. Emissions from construction would be similar to those from agricultural activities common in the County and would only occur for short periods of time in localized areas.[222]

213. During operation of the transmission line, air emissions would be minimal. An insignificant amount of ozone is created due to corona from the operation of transmission lines.[223]

214. During construction, the amount of dust generated would be a function of construction activity, soil type, soil moisture content, wind speed, precipitation, vehicle traffic, vehicle types, and road surface characteristics. Dust emissions would be greater during dry periods and in areas where fine-textured soils are subject to surface activity. If construction activities generate problematic dust levels, Big Bend may employ construction-related practices to control fugitive dust such as application of non-chlorinated water or other commercially available dust control agents on unpaved areas subject to frequent vehicle traffic, reducing the speed of vehicular traffic on unpaved roads, and covering open-bodied haul trucks.[224]

215. The emission of ozone from the operation of a transmission line of the voltages proposed for the Project is not anticipated to have a significant impact on air quality and no mitigation is proposed.[225]

216. Section 5.3.23 of the Draft Route Permit addresses mitigating impacts to air quality. This section requires the permittee to use non-chloride products for onsite dust control during construction.[226]

ii. Climate Change and Resilience

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[221] Application at 75.
[222] Application at 75.
[223] Application at 76.
[224] Application at 76.
[225] Application at 76.
[226] Application at 76.

217. The ROI for climate change and resilience is the County. Potential impacts are anticipated to be long-term, of a small size, and not affect a unique resource.[227]

218. The Project will not have a measurable impact on climate change. Factors contributing to climate change include land use conversion, water usage, and greenhouse gas emissions. The Project will convert a small area of land on the Great River Energy parcel listed on NLCD as agricultural to gravel for the substations. The small size of this converted area will not have an impact on the local climate. During regular operation, the Project will not require any water.[228]

219. In general, Big Bend will locate structures in upland areas and will span areas with hydric soils, wetland features, and other areas that are subject to long periods of increased moisture to the greatest extent practicable. This will prevent structures and footings from long-term exposure to standing water and will ensure that facilities are structurally sound for the lifetime of the Project. Big Bend will engineer the structures and footings for the specific soil types and geotechnical conditions at each structure location. Depending on the conditions at each structure location, either wood or steel monopoles will be used, and each structure will either be directly embedded in the ground or installed in concrete foundations. Therefore, increased risks to the Project associated with flooding are not anticipated.[229]

220. The structures and wires will be designed to meet modern wind-resistance and elevated temperature standards set by current electrical codes and Big Bend design standards. Big Bend will proactively manage vegetation along the transmission line to reduce the possibility of trees or tree limbs impacting the conductors.[230]

221. After completion of construction, Big Bend will revegetate the disturbed non-row-cropped areas according to the VMP, this revegetation will stabilize the land disturbed by construction activities.[231]

iii. Greenhouse Gas Emissions

222. The ROI for greenhouse gases is the County.[232]

223. Construction of the Project will result in greenhouse gas emissions from fuel combustion in construction equipment, commuter vehicles, and delivery trucks. However, the Project's preliminary estimate of greenhouse gas emissions, when compared to statewide levels, would be negligible.[233]

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[227] Application at 77.
[228] Application at 77-78.
[229] Application at 78.
[230] Application at 78.
[231] Application at 78.
[232] Application at 79.
[233] Application at 79.

224. Big Bend will reduce the amount of greenhouse gas emissions from construction equipment by maintaining the equipment in good condition according to manufacturer's recommendations and by reducing idling time.[234]

225. During operations, the Applicants will monitor the sulfur hexafluoride (SF6) gas levels in the substation breakers as part of routine monitoring of substation equipment. Should a loss of SF6 be detected, the SF6 is extracted to a separate tank to allow the breaker to be repaired. Any gas collected from decommissioned breakers is shipped offsite for recycling. Indirect impacts are associated with consumption of the electricity provided by the transmission line. No additional mitigation is proposed.[235]

226. Direct impacts from operation of the Project are limited to inspection and maintenance activities, which will be intermittent and short term.[236]

iv. Geology and Topography

227. According to the Minnesota Geological Survey, depth to bedrock in the Proposed Right-of-Way is over 150 feet deep.[237]

228. The ROI for geology and topography is the Proposed Right-of-Way. Potential impacts will be long term and negligible.[238]

229. Based on the anticipated depth of transmission line and substation foundations, bedrock will not be impacted by the Project. Construction of the Project will not impact topography. The transmission line and substations will be constructed at existing grade. If grading does occur it will be limited to structure and substation locations.[239]

230. Once constructed, the area would then be graded to blend with existing topography and drainage patterns. Abrupt elevation changes will not be created. While abrupt elevation changes and significant grading will not occur along the transmission line, Section 5.3.8 of the Draft Route Permit, requires that contours be graded so that all surfaces blend with the natural terrain.[240]

v. Public and Designated Lands

231. The ROI for public and designated lands is the Proposed Right-of-Way.[241]

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[234] Application at 80.
[235] Application at 80.
[236] Application at 79.
[237] Application at 80.
[238] Application at 81.
[239] Application at 81.
[240] Application at 81.
[241] Application at 81.

232. The Project does not cross public or designated lands. This includes state or national designated wilderness areas; state or national parks; and state scientific and natural areas (Minn. R. 7850.4300).[242] Therefore, impacts will not occur and no mitigation is proposed.[243]

vi. Rare and Unique Natural Resources

233. The U.S. Fish and Wildlife Service (USFWS) Information for Planning and Conservation (IPaC) website was reviewed to obtain an unofficial list for federally listed endangered and threatened species, proposed species, candidate species, and designated critical habitat that may occur in the vicinity of the Proposed Route. Merjent, Inc., on behalf of Big Bend, submitted a formal Natural Heritage Review Request (2025-00796) on September 19, 2025, through DNR's Minnesota Conservation Explorer (MCE) system and a response was received on September 19, 2025.[244]

234. Based on the species list provided by the USFWS, one federally threatened species and two proposed species have been previously documented within the vicinity of the Project. Species proposed for listing are not legally protected under the federal Endangered Species Act. No federally designated critical habitat is present within the Proposed Route.[245]

235. Based on the MCE response from the DNR, there were no state-listed species or state species of special concern with documented occurrences, or ecologically significant areas within the Project Area.[246]

236. The extent of remaining populations of prairie bush clover is well-known in Minnesota; these are present in the Project Area within the Inner Coteau, Coteau Moraines, Minnesota River Prairie, Oak Savanna, and Rochester Plateau subsections. Suitable habitat may be present near Cedar Creek. A field assessment to determine if the federally listed prairie bush clover (Lespedeza leptostachya) is present within the Proposed Route was completed by a DNR-certified listed species surveyor for plants from Midwest Natural Resources on October 6, 2025. Results of the assessment confirmed that the species is not present within the Proposed Route. Therefore, no mitigation is proposed.[247]

237. Suitable habitat for monarchs (federally proposed for listing as threatened) may be present within the Proposed Right-of-Way and Proposed Route. Construction of the Project will result in short-term adverse impacts on suitable habitat, including localized physical disturbance and compaction. Construction activities involving establishment and use of access roads, staging, and stringing areas would also have short-term impacts on suitable habitat by concentrating surface disturbance and equipment use. The movement of construction equipment to, from, and between various work sites has the potential to introduce or spread invasive species.[248]

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[242] Application at 81.
[243] Application at 81.
[244] Application at 82.
[245] Application at 82.
[246] Application at 84.
[247] Application at 84.
[248] Application at 84.

238. The Applicants will restore the Proposed Right-of-Way in accordance with the draft VMP. The Applicants will allow for and encourage native species to naturally re-establish in temporarily disturbed areas that are not actively cropped. Permanent seed mixes include native seed varieties commonly found and available from local seed distributors. The permanent seed mixes are designed to augment the natural colonization of bare ground by local, native seed sources. The Applicants will also manage documented occurrences of terrestrial plant invasive and noxious species as further described in the draft VMP. If the USFWS determines the species should be listed and protections for the species will coincide with the Project's planning, permitting, and/or construction, the Applicants will review these activities for potential impacts to the species, develop appropriate avoidance and mitigation measures, and coordinate with the USFWS as appropriate. No additional mitigation is proposed. [249]

239. Suitable habitat for the Western Regal Fritillary (federally proposed for listing as threatened) may be present within the Proposed Right-of-Way and Proposed Route. Construction of the Project will result in short-term adverse impacts on suitable habitat, including localized physical disturbance and compaction. Construction activities involving establishment and use of access roads, staging, and stringing areas would also have short-term impacts on suitable habitat by concentrating surface disturbance and equipment use. The movement of construction equipment to, from, and between various work sites has the potential to introduce or spread invasive species.[250]

240. The Applicants will restore the Proposed Right-of-Way in accordance with the draft VMP. The Applicants will allow for and encourage native species to naturally re-establish in temporarily disturbed areas that are not actively cropped. Permanent seed mixes include native seed varieties commonly found and available from local seed distributors. The permanent seed mixes are designed to augment the natural colonization of bare ground by local, native seed sources. The Applicants will also manage documented occurrences of terrestrial plant invasive and noxious species as further described in the draft VMP. If the USFWS determines the species should be listed and protections for the species will coincide with Project planning, permitting, and/or construction, the Applicants will review the Project's activities for potential impacts to the species, develop appropriate avoidance and mitigation measures, and coordinate with the USFWS as appropriate. No additional mitigation is proposed.[251]

241. The Applicants do not anticipate impacts to bald eagles or bald eagle nests during construction or operations of the Project. If eagle nests are identified prior to or during construction, the Applicants will record their location and comply with the requirements of the Bald and Golden Eagle Protection Act (BGEPA) to ensure regulatory compliance. No additional mitigation is proposed.[252]

242. There are no DNR Wildlife Management Areas or Aquatic Management Areas crossed by the Proposed Right-of-Way or Proposed Route. There are no DNR-designated Lakes of Biological Significance, Wild Rice Lakes, Trout Lakes, Trout Streams, Outstanding Resource

[249] Application at 84.
[250] Application at 85.
[251] Application at 85.
[252] Application at 85.

Waters or Priority Shallow Lakes within the Proposed Right-of-Way or Proposed Route. Designated important bird areas do not exist with the Proposed Route. There are no DNR Native Prairies, DNR Native Plant Communities, or Minnesota Biological Survey Sites of Biodiversity Significance within the Proposed Right-of-Way or Proposed Route. In addition, there are no calcareous fens within five miles of the Project. Thus, no mitigation is proposed. [253]

vii. Soils

243. The Applicants reviewed Soil Survey Geographic Database (SSURGO) data to identify wind or water erodible soils, hydric soils, soils with revegetation concerns, and soils prone to compaction. There are 48.9 acres of soils within the Proposed Right-of-Way that are classified as hydric. There are 61.6 acres of compaction prone soils within the Proposed Right-of-Way.[254]

244. The ROI for soils is the Proposed Right-of-Way. Potential impacts are anticipated to be of a small size, short-term, and not affect a unique resource within Martin County. Impacts can be mitigated.[255]

245. During construction, soil compaction, rutting and localized soil erosion may occur during clearing and grading of work areas, travel along the right-of-way, and erecting structures and stringing conductors. Similar impacts can occur when constructing the substations. In addition, potential soil impacts might result from excavation, stockpiling, and redistribution of soils. Ground disturbance and soil exposure would be primarily limited to the structure locations. Construction of the substation will result in a new impervious surface. Until permanent stormwater controls are in place, this could lead to increased erosion through stormwater runoff. Soils at the substation locations will be covered with gravel. Compaction will occur in these areas.[256]

246. Compaction-prone soils, particularly within agricultural fields, may require additional mitigation measures during construction to minimize compaction and/or additional protocols during restoration of Project workspaces. The draft VMP provides additional details on the decompaction process during restoration.[257]

247. Impacts to soils would be mitigated through the proper use and installation of BMPs, such as minimizing the number of vehicle trips within the right-of-way to reduce compaction and protection and maintenance of topsoil, during construction of the transmission line. Should significant compaction occur in agricultural areas, it can be mitigated by implementing the decompaction methods outlined in the draft VMP.[258]

248. Big Bend will also develop a Stormwater Pollution Prevention Plan (SWPPP) that complies with the MPCA State Disposal System (SDS) Construction Stormwater (CSW) Permit;

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[253] Application at 85.
[254] Application at 86-88.
[255] Application at 88.
[256] Application at 88.
[257] Application at 88.
[258] Application at 89.

implementation of the SWPPP will minimize the potential for soil erosion during construction. Landowners will be compensated accordingly for any localized soil compaction that might occur.

249. Section 5.3.8 of the Draft Route Permit addresses mitigation of soil erosion and sediment control. This section requires the Applicants to "implement reasonable measures to minimize erosion and sedimentation during construction" among other requirements.[259]

viii. Vegetation

250. The Proposed Route is in the Minnesota River Prairie subsection of the North Central Glaciated Plains Section in the Prairie Parkland Province, as defined by the Ecological Classification System (ECS) of Minnesota. Current land use in the Minnesota River Prairie subsection is now dominated by agriculture, primarily active row crop fields with some pasture. Other current land uses include small amounts of forest, wetlands, open water, and developed areas.[260]

251. The ROI for vegetation is the Proposed Right-of-Way. Potential impacts along the transmission line are anticipated to be short and long term, of a small size and not affect a unique resource. Construction of the substations will result in permanent removal of a maintained grassland vegetation type. Potential impacts are unavoidable but can be mitigated in part.[261]

252. Impacts on vegetation from the transmission line will primarily be associated with cultivated crop areas. Construction of the Project will result in short-term adverse impacts on existing vegetation, including localized physical disturbance and compaction. Construction activities involving establishment and use of access roads, staging, and stringing areas would also have short-term impacts on vegetation by concentrating surface disturbance and equipment use. Construction would also result in long-term impacts on vegetation by permanently removing vegetation at each structure location and maintaining the operational right-of-way free of tall trees and shrubs during the life of the Project. Approximately three acres of trees and shrubs would be cleared from the Proposed Right-of-Way during construction.[262]

253. Big Bend has designed the Application Alignment to minimize tree clearing by co-locating with existing infrastructure rights-of-way to the extent practicable. The Applicants will restore the Proposed Right-of-Way in accordance with the draft VMP. The Applicants will allow for and encourage native species to naturally re-establish temporarily disturbed areas that are not actively cropped. Permanent seed mixes include native seed varieties commonly found and available from local seed distributors. The permanent seed mixes are designed to augment the natural colonization of bare ground by local, native seed sources.[263]

254. The Applicants will manage documented occurrences of terrestrial plant invasive and noxious species that are listed as "eradicate" or "control" under the "Prohibited Noxious

[259] Application at 89.
[260] Application at 89.
[261] Application at 89.
[262] Application at 90.
[263] Application at 90.

Weed" category by the MDA. Further, the Applicants will adhere to the conditions set forth by the DNR Utility License to Cross Public Waters for the crossing of Cedar Creek.[264]

255. The Applicants will implement the BMPs identified in the draft VMP during construction of the Project construction to minimize impacts to vegetation and the potential for the introduction or spread of terrestrial plant invasive and noxious species. Examples include:

- All construction equipment will be clean prior to entering the work site.
- The Applicants will adhere to the requirements of the MPCA SDS CSW Permit, including stabilization, and implementation, maintenance and repair of erosion and sediment control BMPs. Certified weed-free straw or weed-free hay will be used for erosion and sediment control BMPs.
- Limiting grading and excavation to areas surrounding structure foundations, and only as needed along access roads and workspace areas for a level and safe working area.
- Where temporary grading is required, the Applicants will protect topsoil and replace topsoil and will stabilize and restore soil as described in the VMP.
- Minimally disturbed areas will be allowed to restore naturally. Where supplemental seeding is required, seed mixes labelled "Noxious Weeds; None Found" will be used in accordance with regulations and will utilize yellow tag seed when available.
- Infestations of MDA-listed eradicate or control species will be manually, mechanically, or chemically managed.
- Collected invasive materials will be secured and disposed of at an offsite location to avoid dispersal.[265]

256. The Applicants will not conduct activities within waterbodies; therefore, no mitigation to manage aquatic invasive and noxious species are proposed.[266]

257. The Draft Route Permit addresses vegetation, invasive species, and noxious weeds. Section 5.3.10 requires that the minimum number of trees be removed and that low growing species will be left undisturbed, to the extent possible, in the right-of-way, among other requirements. Sections 5.3.12 and 5.3.13 state Big Bend must employ BMPs to avoid the potential introduction and spread of invasive species on lands disturbed by Project construction activities

[264] Application at 90.
[265] Application at 91.
[266] Application at 91.

and take all reasonable precautions against the spread of noxious weeds during all phases of construction.[267]

ix. Water Resources

258. The Project is located within the Blue Earth Watershed within the Minnesota River Basin.[268]

259. The DNR National Hydrography Dataset indicates that three rivers and streams are crossed by the Proposed Route a total of nine times. In Minnesota, rivers, streams, and lakes may be designated as Public Waters and included in the DNR's Public Waters Inventory (PWI) if they meet the criteria set forth in Minn. Stat. § 103G.005, subd. 15. These waters are listed in the PWI and meet the criteria set forth in statute. A license from the DNR is required to cross PWI waters with an electric transmission line (Minn. Stat. § 84.415). The DNR PWI was reviewed to identify Public Waters crossed by the Proposed Route; the Proposed Route crosses Cedar Creek (Cedar Run Creek), a perennial Public Watercourse, four times.[269] Due to the way Cedar Creek meanders in this location, there are more crossings within the Proposed Right-of-Way than within the Proposed Route.[270]

260. The Proposed Right-of-Way crosses the Federal Emergency Management Agency (FEMA)-designated 100-year floodplain areas along Cedar Creek. There are no 500-year floodplain areas crossed by the Proposed Route or within the Substation Area.[271]

261. The Project is not located within the boundaries of any Drinking Water Supply Management Areas or Wellhead Protection Areas.[272] The County Well Index (CWI) is a database that contains subsurface information for over 533,000 water wells drilled in Minnesota. The CWI indicates that there is one functioning well within the Proposed Route. Well ID 734597 is 213 feet deep. Several sealed wells are also shown in the Proposed Route along with test wells. The sealed well is 342 feet deep. There are no wells within the right-of-way.[273]

262. The Applicants reviewed the DNR PWI -- Basins dataset; there are no records of PWI wetlands within the Proposed Route.[274]

263. Based on the review of the DNR's Calcareous Fen geospatial dataset, there are no fens within five miles of the Project.[275]

264. The ROI for water resources is the Proposed Right-of-Way. As surface waters will be spanned and wetlands will be avoided, potential impacts are anticipated to be negligible. If

[267] Application at 91.
[268] Application at 91.
[269] Application at 93.
[270] Application at 93.
[271] Application at 94.
[272] Application at 94.
[273] Application at 95.
[274] Application at 95.
[275] Application at 96.

impacts do occur, they will be short term, of a small size, and not affect a unique resource. Impacts can be mitigated.[276]

265. Section 5.3.9 of the Draft Route Permit addresses mitigating impacts to wetlands. The section requires a variety of measures to mitigate potential impacts to wetlands, waterbodies, and floodplains. This includes spacing structure locations to span and avoid these resources, accessing these areas in a way that minimizes travel through them, and constructing during frozen ground conditions to the extent possible, among other requirements.[277]

266. The Project will have minor, mostly short-term effects on surface water resources. Surface water features will be spanned by the transmission line, and no structures will be installed in those water resources.

267. The Applicants will obtain an NPDES/SDS CSW permit from the MPCA for construction of the Project. The Applicants will utilize erosion and sediment control BMPs (e.g., silt fencing) to mitigate the potential for sediment to reach receiving surface waters. Big Bend does not currently anticipate installing temporary bridges across streams during construction to access structure locations. During Project operations, the Proposed Right-of-Way along Cedar Creek will be maintained in a permanently vegetated state. Additionally, Big Bend has received as-built drawings of drainage facilities from Martin County and will design structure locations to avoid these County facilities. Following completion of construction activities, the Applicants will restore the Proposed Right-of-Way as described in the draft VMP. No permanent impacts on surface water resources are anticipated.[278]

268. The reach of Cedar Creek that is crossed by the Proposed Right-of-Way is impaired for dissolved oxygen and fecal coliform. The Project would not contribute to the impairment of fecal coliform. Potential impacts associated with construction activities could include increased sedimentation and turbidity associated with stormwater runoff from adjacent exposed soils during rainstorm events. Increased turbidity and localized sedimentation can contribute to decreased dissolved oxygen.[279].

269. As mentioned above, the Applicants will apply for coverage under the MPCA NPDES/SDS CSW permit from the MPCA and will develop an SWPPP that will identify BMPs to be implemented during construction to minimize erosion and sedimentation impacts to surface waters.[280]

270. The Project crosses the 100-year floodplain. This might require transmission line structures to be placed within floodplain. The placement of transmission line structures in floodplains is not anticipated to alter the flood storage capacity of the floodplain based on the minimal size and cross section of individual transmission line structures. Big Bend will construct

[276] Application at 96.
[277] Application at 96.
[278] Application at 96.
[279] Application at 96-97.
[280] Application at 97.

structures within the floodplain in accordance with the standards provided in Minn. R. ch. 6120.5800, Subps. 3D and 4E.[281]

271. There are no verified wells in the Proposed Right-of-Way. The Project does not cross a Wellhead Protection Area or Drinking Water Supply Management Area, which was confirmed by Department of Health staff on September 12, 2025. Due to the shallow groundwater table, it is possible that structure installation or substation site preparation will encounter groundwater.[282]

272. A water use permit from the DNR is required for all uses withdrawing more than 10,000 gallons of water per day or one million gallons per year. While this is not expected, the Applicants would obtain coverage under the DNR's Temporary Projects General Permit No 1997-0005, which authorizes temporary water appropriation for construction dewatering, as necessary.[283]

273. The Proposed Right-of-Way crosses 3.51 acres NWI mapped wetlands. Prior to construction, Big Bend will conduct a wetland delineation to confirm wetland boundaries along the permitted route. None of the crossed wetlands are classified as PWI wetlands.[284]

274. Prior to construction, Big Bend will conduct a wetland delineation to confirm wetland boundaries along the permitted route. Furthermore, Big Bend will conduct clearing in wetlands using low ground pressure equipment, working on construction mats, and/or during frozen ground conditions. Staging or stringing setup areas will not be placed within or adjacent to water resources to the extent practicable. The substation upgrades will not be sited in wetlands. The maximum span distance between structures is approximately 800 to 1,100 feet. Based on the current Application Alignment, all wetlands can be spanned by the transmission line. During the final design process, Big Bend will minimize wetland impacts by placing the structures to span and avoid wetlands, to the extent practicable.[285]

275. Once construction of the Project is completed, disturbed soil will be restored to previous conditions to the extent possible, and areas will be reseeded with vegetation similar to that which was removed with a seed mixture certified as free of noxious or invasive weeds.[286]

276. Should impacts to wetlands occur, Big Bend will comply with the CWA and the Minnesota Wetland Conservation Act processes as required and necessary.[287]

277. Section 5.3.9 of the Draft Route Permit addresses mitigating impacts to Wetland and Water Resources. The section requires wetlands to be avoided and, when wetlands cannot be avoided, potential impacts should be limited to the area immediately adjacent to structure locations, among other requirements. "The Permittee shall restore wetland and water resource

[281] Application at 97.
[282] Application at 97.
[283] Application at 97.
[284] Application at 97.
[285] Application at 98.
[286] Application at 99.
[287] Application at 99.

areas disturbed by construction activities to pre-construction conditions in accordance with the requirements of applicable state and federal permits or laws and landowner agreements."[288]

x. Wildlife and Habitat

278. The wildlife species that inhabit the Proposed Right-of-Way are typical of those found in agricultural and grassland-prairie complexes. Wildlife species that occur in wetland and riparian areas might also be present in the Proposed Right-of-Way.[289]

279. There are no DNR-designated Lakes of Biological Significance, Wild Rice Lakes, Trout Lakes, Trout Streams, Outstanding Resource Waters or Priority Shallow Lakes within the Proposed Right-of-Way. Designated important bird areas do not exist with the Proposed Route.[290]

280. The ROI for wildlife and their habitat is the Proposed Right-of-Way, except that the ROI for birds is the Local Vicinity. There is minimal potential for the permanent displacement of wildlife, loss of habitat or habitat fragmentation from construction of the Project.[291]

281. Potential impacts on wildlife during construction would be primarily related to temporary disturbance and displacement; wildlife may be acclimated to human activity due to the agricultural activity within the Local Vicinity.[292]

282. The Applicants will restore the Proposed Right-of-Way in accordance with the draft VMP and will allow for and encourage native species to naturally re-establish temporarily disturbed areas.[293]

H. Unavoidable Impacts

283. The Project will be designed, constructed, and operated in manner that mitigates potential impacts to the greatest extent possible. However, even with mitigation measures, there will be impacts that cannot be avoided. Unavoidable impacts associated with construction could include:

- Fugitive dust emissions on and near gravel roads.
- Greenhouse gas emissions.
- Vegetative clearing at substation locations.
- Minor amounts of habitat loss.

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[288] Application at 99.
[289] Application at 99.
[290] Application at 100.
[291] Application at 100.
[292] Application at 100.
[293] Application at 100.

- Noise disturbances and visual impacts.
- Soil compaction.
- Short-term traffic delays.
- Temporary construction dewatering.
- Temporary disturbance and displacement of wildlife; impacts on individuals.[294]

284. Unavoidable impacts associated with operation could include:

- Continued maintenance of tall growing woody vegetation.
- Conversion of agricultural land at structure locations and maintained grasslands in the Substation Development Area.
- Increased EMF on the landscape. (Potential impacts from EMF are minimal and are not expected to impact human health.)
- Incremental increase in the potential for avian collisions or electrocution.
- Potential interference with AM radio signals.
- Limited greenhouse gas emissions from maintenance activities.
- Incremental visual changes to the landscape.[295]

I. Irreversible and Irretrievable Impacts

285. Minn. Stat. § 216I.05, subd. 11(b)(11), requires the Commission to consider "irreversible and irretrievable commitments of resources" when determining whether to issue Route Permit.

286. Irreversible resource commitments associated with the Project will include the land use associated with the transmission line structures and the substations.

287. The estimated service life of the proposed Project is approximately 40 years. However, it is anticipated that there will continue to be a need for the transmission line and associated substation after 40 years and that infrastructure would likely be replaced or upgraded to extend its useful life. Therefore, while the Project could be decommissioned after 40 years of service, and the area occupied by the transmission line and substations could be restored to an agricultural or other use and transmission line and substation components, such as conductors and

[294] Application at 101.
[295] Application at 101.

transformers, could be repurposed or recycled, this is unlikely to happen in the reasonably foreseeable future because the need for the Project will likely persist.[296]

288. Irretrievable resource commitments associated with the Project are related to construction activities. The use of aggregate, concrete, fuel, human labor, steel, water, wood, and other consumable resources is irretrievable. Funding could be irretrievable in part.[297]

J. Cumulative Potential Effects

289. The Applicants reviewed the list of current and reasonably future projects and determined that the projects will not occur within the environmentally relevant area or are otherwise complete.[298]

290. The Applicants reviewed local government unit's websites, including Martin County and Trimont, the EQB and MPUC interactive project viewers. The MPUC project database was reviewed. Martin County and MnDOT road projects were identified. No MnDOT projects are proposed in the environmentally relevant area. Martin County plans to conduct work on County Highway 38 east of Trimont. This Project is on the "Years 5-10" horizon; therefore, it is not reasonably foreseeable for the purposes of this analysis.[299]

291. The Big Bend and Red Rock Solar EA, prepared by the Minnesota Department of Commerce Energy and Environmental Analysis Unit in 2022, concluded "there is potential for impact to transportation routes [the Applicants] and their contractor will use for accessing the Project Area or getting equipment and materials to the Project Area."[300]

VIII. DRAFT ROUTE PERMIT

292. The Draft Route Permit filed by EIP Staff on February 18, 2026, includes standard permit conditions and three special permit conditions specific to the Project in Sections 6.1, 6.2, and 6.3 of the Draft Route Permit. [301] Section 6.1 would require the Applicants avoid tree removal from June 1 through August 15. Section 6.2 would require the Applicants to coordinate with DNR and Martin County on a tree replacement plan for the Project. Section 6.3 would require the Applicants to coordinate with the manager of the Cedar Lutheran Cemetery regarding additional tree plantings that could minimize aesthetic impacts of the transmission line on individuals visiting the cemetery. Any plantings could be coordinated with proposed Section 6.2 to meet a portion of the tree replacement requirements.[302]

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[296] Application at 102.
[297] Application at 102.
[298] Application at 103.
[299] Application at 103.
[300] *See* Application at 104; *see also* Big Bend Wind and Red Rock Solar Environmental Assessment (2022) at 365, available online at: https://puc.eip.mn.gov/node/7341 (last accessed April 2026).
[301] EIP Staff Scoping Summary and Draft Route Permit (Feb. 18, 2026) (eDocket No. 20262-228314-01).
[302] *See* EIP Scoping Summary at 3-4 (Feb. 18, 2026) (eDocket No. 20262-228314-01).

293. In Brie Anderson's Direct Testimony, filed on April 1, 2026, the Applicants noted that they did not object to the three special permit conditions recommended by EIP Staff.[303] In the testimony, the Applicants reiterated their request for the Commission to issue separate route permits to each applicant, reflecting the respective portions of the Project that will be owned by each. The Applicants provided a redline of the Draft Route Permit filed by EIP Staff that specifically reflected the portions of the Project that will be owned and operated by Big Bend and Great River Energy.[304]

294. The permit conditions contained in the redline permits filed by the Applicants are supported by the record and consistent with other recent permits issued by the Commission.

IX. NOTICE

295. Minnesota statutes and rules require an Applicant to provide certain notice to the public and local governments regarding a route permit process.[305]

296. The Applicants provided notice to the public and local governments in satisfaction of Minnesota statutory and rule requirements.[306]

297. EIP Staff likewise provided notices in satisfaction of Minnesota statutes and rules.[307]

X. COMPLETENESS OF EA

298. The EA process is the alternative environmental review approved for HVTLs pursuant to the Standard Review Process.[308]

299. The evidence in the record demonstrates that the EA is adequate. On February 18, 2026, and following the January 13 and 14, 2026, public information and scoping meetings, Commission EIP Staff submitted a Scoping Summary and Recommendations, recommending that the Commission find an EA addendum is not required for the Project.[309] On March 24, 2026, the Commission issued an order finding that an EA addendum is not required for the Project.[310]

300. The record further establishes that the EA otherwise meets the criteria and contains information prescribed by Minn. Stat. §§ 216I.05, subd.4 and 216I.07, subd. 3.

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[303] Anderson Direct at 8:12-22.
[304] Anderson Direct at 9:1-10 and Schedules C-D. *See also*, Response to Public Comments (April 27, 2026) providing corrected redline of requested Big Bend Route Permit.
[305] Minn. Stat. § 216I.05, subd. 5.
[306] Application at 3-9 and Appendices D-E.
[307] *See* Notice of Complete Route Permit Application and Public Information Meetings (Dec. 30, 2025) (eDocket No. 202512-226288-01); *see also* PUC Notice of Public Hearings and Availability of Draft Permit (March 24, 2026) (eDocket No. 20263-229581-01).
[308] Minn. Stat. § 216I.07, subd. 3.
[309] EIP Staff Scoping Summary and Draft Route Permit (Feb. 18, 2026) (eDocket No. 20262-228314-01).
[310] PUC Order (March 24, 2026) (eDocket No. 20263-229587-01).

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 December 30, 2025.[311]

4. Applicants have prepared an appropriate EA of the Project for purposes of this proceeding, and which satisfies the requirements of Minn. Stat. §§ 216I.05, subd. 4, and 216I.07, subd. 3.

5. Commission appropriately concluded that no addendum to the EA should be prepared.

6. Applicants and the Commission gave notice as required by Minn. Stat. Ch. 216I.

7. A public hearing was conducted near the Proposed Route. Proper notice of the public hearing was provided, as required by Minn. Stat. §§ 216I.05, subd. 9, and 216I.07, subd. 4, 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.

8. The evidence in the record demonstrates that the Proposed Route satisfies the Route Permit factors set forth in Minn. Stat. § 216I.05, subd. 11.

9. 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.

10. The evidence in the record demonstrates that the Proposed Route is the best route for the Project.

11. The evidence in the record demonstrates that the general Route Permit conditions are appropriate for the Project, with a separate route permit being issued to each applicant, reflecting the respective portions of the Project that will be owned by each.

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

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[311] Notice of Complete Route Permit Application and Public Information Meetings (Dec. 30, 2025) (eDocket No. 202512-226288-01).

In Matter of the Application of Big Bend Wind, LLC and Great River Energy for a Route Permit for a 161-kV high voltage transmission line and associated facilities in Martin County	**MPUC Docket No. IP7013/TL-25-389** **CAH Docket Number: 22-2500-41594**

CERTIFICATE OF SERVICE

Maia Martinez certifies that on the 27th day of April, 2026, she e-filed true and correct copy of the Response to Public Hearing Comments, the Proposed Findings of Fact and Conclusions of Law, and the Revised Schedule C to Brie Anderson's Direct Testimony on behalf of Big Bend Wind, LLC and Great River Energy via eDockets (www.edockets.state.mn.us).

Said document was also served as designated on the Official Service Lists on file with the Minnesota Public Utilities Commission and as attached hereto.

Executed on: April 27, 2026

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	Brie	Anderson	brie.anderson@apexcleanenergy.com	Apex Clean Energy, Inc.		8665 Hudson Boulevard North, Suite 200 Lake Elmo MN, 55402 United States	Electronic Service		No	25-389Official CC Service List
2	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	25-389Official CC Service List
3	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	25-389Official CC Service List
4	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	25-389Official CC Service List
5	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		Yes	25-389Official CC Service List
6	Richard	Davis	richard.davis@state.mn.us		Public Utilities Commission	121 7th Place E, Suite 350 Saint Paul MN, 55101 United States	Electronic Service		No	25-389Official CC Service List
7	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	25-389Official CC Service List
8	Christa	Moseng	christa.moseng@state.mn.us		Office of Administrative Hearings	P.O. Box 64620 Saint Paul MN, 55164-0620 United States	Electronic Service		Yes	25-389Official CC Service List
9	Cezar	Panait	cezar.panait@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	25-389Official CC Service List
10	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	25-389Official CC Service List
11	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix & Associates		7400 Lyndale Avenue South Suite 190 Richfield MN, 55423 United States	Electronic Service		Yes	25-389Official CC Service List
12	Mark	Strohfus	mstrohfus@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	25-389Official CC Service List