



June 17, 2025

—Via Electronic Filing—

The Honorable James Mortenson
Minnesota Office of Administrative Hearings
P.O. Box 64620
St. Paul, MN 55164-0640

Re: Response to Public Comments

*In the Matter of the Application of ITC Midwest LLC for a Route Permit
for the 161 kV Transmission Line from Forks Substation to Rost Substation
in Jackson County, Minnesota
Docket No. ET6675/TL-24-232
OAH Docket No. 5-2500-40519*

Dear Judge Mortenson:

In accordance with the Prehearing Order, ITC Midwest LLC (ITC Midwest or Applicant) provides this response to public comments. ITC Midwest appreciates the participation of the public and other stakeholders in this Route Permit proceeding for the Forks – Rost 161 kV Transmission Line Project (Project). During the most recent comment period, comments were filed by the Minnesota Department of Natural Resources (MnDNR) and the interagency Vegetation Management Planning Working Group (VMPWG). ITC Midwest responds to each of these comments in turn as well as a question from a member of the public that was raised at one of the scoping meetings for the Environmental Assessment.

In its June 6, 2025 comments, the MnDNR proposed five special conditions to the Route Permit regarding: (1) calcareous fen, (2) avian flight diverters, (3) facility lighting, (4) dust control, and (5) wildlife-friendly erosion control.¹ ITC Midwest has no objections to these proposed special conditions and notes that four of these special conditions were included in the draft Route permit attached as Appendix E to the EA.² The MnDNR also noted that the Project may require a MnDNR License to Cross and Water Appropriation Permit. ITC Midwest will apply for these permits, as needed, after the Commission makes its decision on the Route Permit.

The VMPWG also filed comments on June 6, 2025.³ In these comments, the VMPWG proposed numerous additions to the draft Vegetation Management Plan (VMP) that was provided as Appendix K to the Project's Route Permit Application. The VMPWG stated that these comments were being provided to help VMPWG work with ITC Midwest to finalize the VMP and that VMPWG is not asking that the Minnesota Public Utilities Commission (Commission) take any action at this time.⁴

¹ MnDNR Comment Letter at 1-3 (June 6, 2025) (eDocket No. [20256-219664-01](#)).

² The avian flight diverters condition was not included.

³ VMPWG Comment Letter (June 6, 2025) (eDocket No. [20256-219668-01](#)).

⁴ *Id.* at 1.

ITC Midwest looks forward to working with the VMPWG on finalizing the VMP for this Project. ITC Midwest agrees that certain revisions proposed by the VMPWG are appropriate and can be added to the VMP such as adding further description of the vegetation management techniques that will be used during operation and maintenance of the Project.⁵ ITC Midwest notes, however, that certain additions proposed by VMPWG seem excessive or unnecessary given this Project's scope and location. As noted in the EA, the entire length of the Proposed Route for the Project is located along road right-of-way within a primarily agricultural landscape.⁶ For instance, VMPWG's request that ITC Midwest prepare an annual monitoring report for the VMP and potentially update the VMP on an annual basis seems unnecessary. In addition, certain additions proposed by VMPWG are covered either by the Route Permit issued by the Commission or by other state-issued permits. For instance, the VMPWG requests that the VMP be updated to describe the pre-construction activities and identification of laydown areas and temporary roads.⁷ This information is already required by the Route Permit to be filed with the Commission as part of the Project's plan and profile filings.⁸ ITC Midwest appreciates the comments from the VMPWG and looks forward to working together on a final VMP that is suitable for the scope and location of the proposed Project.

Please contact me at (763) 257-6821 or mrothfork@itctransco.com if you have any questions regarding this filing.

Sincerely,

Mark Rothfork

Mark Rothfork, Lead Permitting Specialist
ITC Midwest LLC
Email: mrothfork@itctransco.com

cc: Service List

⁵ *Id.* at 4.

⁶ Environmental Assessment at 106 (April 30, 2025) (eDocket No. [20254-218381-01](#)).

⁷ VMPWG Comment Letter at 3 (eDocket No. [20256-219668-01](#)).

⁸ Environmental Assessment at Appendix E at 5.3.5 (eDocket No. [20254-218381-01](#)) ("The Permittee shall submit the location of temporary workspaces and driveways with the plan and profile pursuant to Section 9.1.").

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Midwest LLC for a Route Permit for the 161
kV Transmission Line from Forks Substation
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CERTIFICATE OF SERVICE

Gustav Gerhardson certifies that on the 17th day of June, 2025, on behalf ITC Midwest LLC, he efiled a true and correct copy of the **Response to Public Comments** by posting the same on [eDockets](#). Said filing is also served as designated on the attached Service List on file with the Minnesota Public Utilities Commission in the above-referenced docket number.

/s/ Gustav Gerhardson

Gustav Gerhardson

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Katherine	Arnold	katherine.arnold@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		No	24-232Official CC Service List
2	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		No	24-232Official CC Service List
3	Bret	Eknes	bret.eknes@state.mn.us		Public Utilities Commission	Suite 350 121 7th Place East St. Paul MN, 55101-2147 United States	Electronic Service		No	24-232Official CC Service List
4	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	24-232Official CC Service List
5	Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S. Eighth Street Minneapolis MN, 55402 United States	Electronic Service		No	24-232Official CC Service List
6	Raymond	Kirsch	raymond.kirsch@state.mn.us		Department of Commerce	85 7th Place E Ste 500 St. Paul MN, 55101 United States	Electronic Service		No	24-232Official CC Service List
7	James	Mortenson	james.mortenson@state.mn.us		Office of Administrative Hearings	PO BOX 64620 St. Paul MN, 55164-0620 United States	Electronic Service		Yes	24-232Official CC Service List
8	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		No	24-232Official CC Service List
9	Mark	Rothfork	mrothfork@itctransco.com	ITC Midwest LLC		100 East Grand Ave, Suite 360 Des Moines IA, 50309 United States	Electronic Service		No	24-232Official CC Service List
10	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		No	24-232Official 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	24-232Official CC Service List