

February 25, 2026

VIA eFILING

Ms. Sasha Bergman
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

The Honorable Joseph Meyer
Court of Administrative Hearings
600 North Robert Street
P.O. Box 64620
St. Paul, MN 55164-0620

Re: In the Matter of Application of Great River Energy and Lake Region Electric Cooperative for a Route Permit for the Otto Tap 115-kV Transmission Line Project in Otter Tail County, Minnesota

MPUC Docket No. ET2/TL-25-269

CAH Docket No. 28-2500-41458

Dear Ms. Bergman and Judge Meyer:

Great River Energy respectfully submits these comments in response to written comments submitted during the public hearing comment period ending February 19, 2026, on the Application for a Route Permit (Application) for the Otto Tap 115-kV Transmission Line Project in Otter Tail County, Minnesota (Project) filed with the Minnesota Public Utilities Commission (Commission).¹ During the comment period, written comments were submitted by the Minnesota Interagency Vegetation Management Planning Working Group (VMPWG)² and the Minnesota Department of Natural Resources (MDNR).³ Great River Energy appreciates the opportunity to offer this response. With these comments, Great River Energy also provides Proposed Findings of Fact and Conclusions of Law for the convenience of Commission staff in reviewing this docket.

1. VMPWG

The VMPWG submitted comments on the Project's Vegetation Management Plan (VMP) on February 19, 2026. Great River Energy appreciates the VMPWG's feedback and will work with the VMPWG regarding the Project's VMP.

¹ No comments were submitted during the in-person or virtual public hearings on February 2 and 3, respectively.

² VMPWG Public Hearing Comments (Feb. 19, 2026) (eDocket No. [20262-228389-01](#)).

³ MDNR Public Hearing Comments (Feb. 19, 2026) (eDocket No. [20262-228385-01](#)).

2. MDNR

MDNR submitted comments on February 19, 2026, regarding avian protection, tree clearing timing, the VMP, facility lighting, dust control, wildlife-friendly erosion control, public waters, and water appropriation.⁴ Great River Energy generally does not object to MDNR's comments, with the exception of MDNR's recommendation regarding tree clearing. Specifically, MDNR recommends including a special permit condition requiring the Applicants to avoid tree removal from June 1 through August 15.⁵ Great River Energy does not support this recommendation because it is broader than typically required by the Commission and is not necessitated by this Project.⁶ Rather, Applicants will comply with applicable regulations and U.S. Fish and Wildlife Service (USFWS) requirements related to tree clearing and will continue to coordinate with the USFWS prior to construction of the Project. To the extent the Commission seeks to impose a special permit condition related to the timing of tree clearing, Great River Energy respectfully requests that the Commission impose the following condition, which is consistent with other dockets:

The Permittees will coordinate with the U.S. Fish and Wildlife Service regarding the timing of tree clearing and any other conservation measures to mitigate impacts to Northern Long-Eared Bat. The Permittees shall keep records of compliance with this section and provide them upon the request of Commission staff.⁷

To the extent MDNR has concerns about state-listed species in the Project area, Great River Energy does not object to the following condition, which is consistent with a condition recently imposed in MPUC Docket No. 24-264:

State Listed Species: Prior to the start of construction, the Permittees shall resubmit a Natural Heritage Review and continue to consult

⁴ See generally MDNR Public Hearing Comments (Feb. 19, 2026) (eDocket No. [20262-228385-01](#)).

⁵ See MDNR Public Hearing Comments at 1 (Feb. 19, 2026) (eDocket No. [20262-228385-01](#)).

⁶ See e.g., Order Issuing Route Permit at Section 5.10 (Northern Long Eared Bat), *In the Matter of the Joint Application of Minnesota Power for a Site and Route Permit for the 85-megawatt Boswell Solar Project and Associated 2.45-mile, 230-kilovolt Transmission Line in Itasca County, Minnesota*, MPUC Docket No. E-015/GS-24-425; E-015/TL-24-426 (Jan. 28, 2026); Order Issuing Route Permit at Section 6.2 (North Long-Eared Bats) *In the Matter of the Application of Dairyland Power Cooperative for a Route Permit for a 161 kV Transmission Line in Fillmore County, Minnesota*, MPUC Docket No. ET-3/TL-24-95 (Sept. 22, 2025).

⁷ See Order Adopting Administrative Law Judge Report and Issuing Route Permit at Special Condition 6.1, *In the Matter of the Application of Great River Energy for a Route Permit for the Reroute of the 115-kV Cedar Lake Transmission Line Project in Scott and Rice Counties*, MPUC Docket No. ET-2/TL-23-170 (June 7, 2024); see also Order Adopting Administrative Law Judge Report and Issuing Route Permit at Special Condition 6.2, *In the Matter of the Application of Great River Energy for a Route Permit to Rebuild the Existing 69 kV ST-WW Transmission Line to 115 kV in Stearns County, Minnesota*, MPUC Docket No. ET-2/TL-22-235 (Oct. 23, 2023).

February 25, 2026
Page 3

with the MDNR regarding implementation of avoidance measures for state-protected threatened and endangered species. The Permittees will comply with applicable Minnesota Department of Natural Resources requirements related to state-listed endangered and threatened species in accordance with Minnesota's Endangered Species Statute (Minnesota Statutes, section 84.0895) and associated Rules (Minnesota Rules, parts 6212.1800 to 6212.2300 and 6134). The Permittees shall keep records of compliance with this section and provide them upon the request of Commission staff.

These comments have been e-filed today through www.edockets.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.

/s/ Haley L. Waller Pitts

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

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Cooperative for a Route Permit for the Otto
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TABLE OF CONTENTS

STATEMENT OF ISSUES	1
SUMMARY	1
FINDINGS OF FACT.....	1
I. APPLICANTS	1
II. PROCEDURAL HISTORY	2
III. DESCRIPTION OF THE PROJECT	4
IV. NEED OVERVIEW	4
V. ROUTES EVALUATED.....	4
A. Routes Evaluated by Applicants.	4
VI. TRANSMISSION LINE STRUCTURE TYPES AND SPANS	5
VII. TRANSMISSION LINE CONDUCTORS	5
VIII. TRANSMISSION LINE ROUTE WIDTHS	6
IX. TRANSMISSION LINE RIGHT-OF-WAY	6
X. PROJECT SCHEDULE.....	6
XI. PROJECT COSTS	6
XII. PERMITTEES	7
XIII. PUBLIC AND LOCAL GOVERNMENT PARTICIPATION	7
XIV. FACTORS FOR A ROUTE PERMIT	7
XV. APPLICATION OF ROUTING FACTORS TO THE PROPOSED ROUTE	10
A. Effects on Human Settlement.	10
B. Effects on Public Health and Safety.	15
C. Effects on Land-Based Economies.	17
D. Effects on Archaeological and Historic Resources.....	19
E. Effect on Natural Environment.	20
F. Use of or Paralleling of Existing Railroad and Highway Rights-of- Way, Survey and Division Lines, and Existing High-Voltage Transmission Rights-of-Way.....	27
G. Electrical System Reliability.....	27

H.	Costs of Constructing, Operating, and Maintaining the Facility.	27
I.	Adverse Human and Natural Environmental Effects that Cannot be Avoided.....	27
J.	Irreversible and Irrecoverable Commitments of Resources.	28
K.	CUMULATIVE IMPACTS.....	28
XVI.	ROUTE PERMIT CONDITIONS	29
XVII.	NOTICE.....	29
XVIII.	COMPLETENESS OF EA	29
CONCLUSIONS OF LAW		30

**STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION**

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

Great River Energy and Lake Region Electric Cooperative (LREC) (together, the Applicants) have applied for a Route Permit (Application) to build a new 115 kilovolt (kV) single-circuit high voltage transmission line (HVTL) (Transmission Line) in Otto and Pine Lake Townships in Otter Tail County, Minnesota, referred to as the Otto Tap 115 kV Transmission Line Project (Project). The Project will be approximately 2.9 miles long and includes construction of a new Otto Substation (or Substation) that will replace the existing Otto Substation.

Public hearings on the Application were held on February 2, 2026 (in-person), and February 3, 2026 (remote-access). The factual record remained open until February 19, 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 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. APPLICANTS

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

¹ eDocket ID No. 202511-224627-02 at 1.1 (Application).

2. LREC is the distribution cooperative serving the area in which the Project will be located. It is one of Great River Energy's transmission customers, and it will be the owner of the proposed new Otto Substation. LREC is based in Pelican Rapids, Minnesota and provides electric service to a 3,200-square-mile service area which includes portions of seven Minnesota counties: Becker, Clay, Douglas, Grant, Todd, Wadena, and Wilkin.²

II. PROCEDURAL HISTORY

3. On November 3, 2025, the Applicants submitted the Application.³ Applicants stated that they intended to use the Standard Review Process pursuant to Minn. Stat. § 216I.07.⁴

4. On November 18, 2025, the Commission accepted the Application as sufficiently complete to proceed with the public information meeting in accordance with Minn. Stat. § 216I.05.⁵

5. On November 18, 2025, the Commission filed a Notice of Complete Route Permit Application and Public Information Meetings.⁶ The Notice set virtual and in-person public information and scoping meetings on the Project for December 3 and 4, 2025, respectively.⁷

6. The Notice of Complete Route Permit Application and Public Information Meetings was also published in the Perham Focus on November 18, 2025, the New York Mills Dispatch on November 19, 2025, and the Minnesota Environmental Quality Board (EQB) bulletin November 25, 2025.⁸

7. On November 18, 2025, the Commission filed a Sample HVTL Permit for the Project.⁹

8. On December 2, 2025, and pursuant to the Commission's request for supplemental information in the Commission's November 18, 2025, Application Completeness Determination, Applicants submitted a supplemental filing.¹⁰

9. On December 3, 2025, the Commission held a remote public information and scoping meeting via Webex.¹¹ No members of the public provided comments at this meeting.

² Application at 1.1.

³ Application and eDocket ID No. 202511-224627-01 (Application Letter).

⁴ Application Letter at 1.

⁵ eDocket ID No. 202511-225019-01 at 2 (Application Completeness Determination).

⁶ eDocket ID No. 202511-225028-01 at 1 (Notice of Completeness and Public Meetings).

⁷ Notice of Completeness and Public Meetings at 1-2.

⁸ eDocket ID Nos. 202512-225990-01 (New York Mills Dispatch Notice) and 202512-225469-01 at 3-4 (EQB Notice).

⁹ eDocket ID No. 202511-225134-01 (Sample Permit).

¹⁰ eDocket ID No. 202512-225448-01 (Supplemental Completeness Filing).

¹¹ eDocket ID No. 202512-225980-01 (Virtual Scoping Hearing Transcript).

10. On December 4, 2025, the Commission held an in-person public information and scoping meeting.¹² One member of the public submitted an oral comment at the hearing.¹³ The written public comment period remained open through December 18, 2025.

11. On December 17, 2025, Otter Tail County provided written comments on the Project.¹⁴

12. On January 7, 2026, Commission Energy Infrastructure Permitting Staff (EIP) submitted a Scoping Summary and Recommendations, finding that an environmental assessment (EA) addendum is not required for the Project, recommending that the Draft Route Permit prepared by EIP be issued, including special permit conditions, and requesting that an Administrative Law Judge from the Court of Administrative Hearings (CAH) conduct public hearings for the Project and prepare a summary of public testimony.¹⁵

13. On January 7, 2026, Administrative Law Judge Meyer issued an Order for Prehearing Conference, setting the conference date for January 9, 2026.¹⁶

14. On January 8, 2026, the Commission issued proposed consent items.¹⁷

15. On January 13, 2026, Administrative Law Judge Meyer issued a First Prehearing Order establishing a schedule for the proceedings.¹⁸

16. On January 16, 2026, the Commission issued a Notice of Public Hearings and Availability of Draft Permit.¹⁹

17. The Commission held public hearings on the Project on February 2, 2026 (in-person) and February 3, 2026 (virtual). No members of the public commented at either hearing. The public comment period was open until February 19, 2026.²⁰

18. On February 18, 2026, Great River Energy filed comments regarding the Draft Route Permit.²¹

19. On February 19, 2026, comments were filed by the Minnesota Department of Natural Resources (MDNR) and the Minnesota Interagency Vegetation Management Planning Working Group (VMPWG).²²

¹² eDocket ID No. 202512-225980-02 (In-Person Scoping Hearing Transcript).

¹³ In-Person Scoping Hearing Transcript at 8:25-10:4.

¹⁴ eDocket No. 202512-226032-01 (Otter Tail December 17, 2025 Comment).

¹⁵ eDocket ID No. 20261-226587-01 (EIP Summary and Recommendations).

¹⁶ eDocket ID No. 20261-226581-01 (Order for Prehearing Conference).

¹⁷ eDocket ID No. 20261-226615-01 (Proposed Consent Items).

¹⁸ eDocket ID No. 20261-226806-01 (First Prehearing Order).

¹⁹ eDocket ID No. 20261-227007-01 (Notice Public Hearings and Permit Availability).

²⁰ Notice Public Hearings and Permit Availability at 3.

²¹ eDocket ID No. 20262-228277-01 (Great River Energy Comment).

²² eDocket ID Nos. 20262-228385-01 (MDNR Comment) and 20262-228389-01 (VMPWG Comment).

20. On February 25, 2026, Great River Energy submitted its Response to Hearing Comments and Proposed Findings of Fact and Conclusions of Law.

III. DESCRIPTION OF THE PROJECT

21. The Project consists of a new 2.9-mile 115 kV single-circuit HVTL in Otto and Pine Lake Townships in Otter Tail County, Minnesota. The Project also includes construction of a replacement Substation for the existing Otto Substation.²³

22. The Project includes a tap line from Great River Energy's 115 kV Perham to Rush Lake (LR-PR) transmission line to LREC's Otto Substation Parcel where the new Otto Substation will be constructed to receive 115 kV service. The Project will enable LREC to continue to provide reliable service by upgrading the Otto Substation with a connection to the 115 kV transmission system. The Transmission Line will be constructed and owned by Great River Energy; the Otto Substation will be constructed and owned by LREC.²⁴

23. The existing Otto Substation footprint is approximately 0.1 acre. LREC intends to locate the new Otto Substation 115 kV infrastructure directly south of the existing substation – to the south of 390th Street and west of 470th Avenue. The new footprint will be approximately 60 feet by 140 feet (8,400 square feet or approximately 0.02 acre).²⁵

IV. NEED OVERVIEW

24. The proposed Transmission Line is needed to improve regional electrical reliability by providing the Otto Substation with a new connection to the 115 kV transmission system.²⁶ The existing Otto Substation is aging and, due to its conditions, needs to be replaced.²⁷

25. Because the proposed HVTL is less than 10 miles in length, a Certificate of Need is not required for the Project.²⁸

V. ROUTES EVALUATED

A. Routes Evaluated by Applicants.

1. Applicants' Proposed Route.

26. The Applicants' Proposed Route begins at the junction of Highway 10 and 410th Street. It then runs parallel to 410th Street for approximately 4,500 feet. It then turns south, following parallel to 470th Avenue for approximately two miles at which point it reaches the connection point with the Otto Substation.²⁹

²³ Application at 1.

²⁴ Application at 1.

²⁵ Application at Figure 1 & 3.2.1.

²⁶ Application at 1.6.

²⁷ Application at 1.6.

²⁸ Minn. Stat. § 216B.2421; Minn. Stat. § 216B.24; Application at 2.1.

²⁹ Application at Figure 1.

2. Other Routes Considered and Rejected by Applicants.

27. Minn. Stat. § 216I.05, subd. 3(b)(14), requires an applicant to identify any alternative routes that were considered and rejected for the Project.

28. Applicants evaluated an alternative that would tap the LR-PR 115 kV line near U.S. Highway 10 and 470th Avenue (around structure LR-PR-34), add a new three-way switch south of the BNSF railroad right-of-way, cross U.S. 10, and then run south along 470th Avenue about 2.7 miles to the Otto Substation, crossing 410th Street and 390th Street. The primary concern with the rejected route was the tight spacing north of U.S. 10 between the switch, the BNSF rail line, and the highway; this co-location constraint is not present at the Proposed Route's tap location near 410th Street.³⁰

29. The alternative was ultimately rejected in favor of the Proposed Route. Great River Energy did not consider any other existing rights-of-way as alternatives because the Proposed Alignment is collocated with existing rights-of-way for 2.9 miles, or 97 percent, of its length. Other rights-of-way are farther from the Project and would have resulted in longer alignments.³¹

30. Applicants also concluded that the rejected alignment posed human and environmental impacts comparable to the Proposed Route. Unlike the rejected alternative, the Proposed Alignment also avoided coming within 100 feet of a residence.³²

VI. TRANSMISSION LINE STRUCTURE TYPES AND SPANS

31. Great River Energy will construct the Project primarily with direct-embedded single-pole wood or steel structures, 70 to 90 feet above ground and placed 350 to 400 feet apart.³³

32. The footprint of the existing Otto Substation is approximately 0.1 acres. The new Otto Substation footprint will be approximately 0.02 acres (8,400 square feet). Distribution level components within the Substation will include a 115/12.47 kV transformer, 8-foot by 8-foot electrical equipment enclosure, switch gear, and bus work. The "high-side" 115 kV structure (the last structure before the conductors interconnect to Substation equipment) will be located within the Substation footprint.³⁴

VII. TRANSMISSION LINE CONDUCTORS

33. The single circuit structures will have three phase wires and one shield wire. It is anticipated that the phase wires will be 477 thousand circular millimeter aluminum-conductor steel reinforced (477 ACSR) or a conductor with similar capacity.³⁵

³⁰ Application at 4.2.

³¹ Application at 4.1.

³² Application at 4.3.

³³ Application at 3.1.5.

³⁴ Application at 3.2.1.

³⁵ Application at 5.1.2.

34. The shield wire will be 0.555 optical ground wire.³⁶

VIII. TRANSMISSION LINE ROUTE WIDTHS

35. Applicants generally request a 200-foot-wide Proposed Route centered on existing road centerlines; Great River Energy is also requesting varied widths for two portions of the Proposed Route to account for existing infrastructure, mitigate potential engineering challenges, and facilitate potential realignments to connect to the Otto Substation:

- Approximately 750 feet by 260 feet where the Proposed Route crosses U.S. Highway 10 at 410th Street; and
- Approximately 300 feet by 300 feet to encompass transmission line alignment options into the new Otto Substation that includes the entire 1-acre parcel.³⁷

IX. TRANSMISSION LINE RIGHT-OF-WAY

36. Great River Energy will require a new 100-foot-wide right-of-way (50 feet on each side of the Transmission Line) for construction and maintenance of the Project. Great River Energy's easement can overlap with road and other rights-of-way through permits or other agreements, which can reduce the amount of easement areas acquired from landowners. Where a transmission line of this size parallels roads, structures are typically installed two to seven feet outside of road right-of-way, resulting in approximately 55 feet of right-of-way being needed from landowners outside of road right-of-way. Great River Energy representatives will work directly with individual landowners to acquire the necessary easements and other land rights for the construction, operation, and maintenance of the Project once the final route and alignment are determined.³⁸

37. LREC owns the land on which the new Otto Substation will be located.³⁹

X. PROJECT SCHEDULE

38. The Applicants anticipate starting construction of the Project in fall 2027 and energizing the Project in the summer of 2028.⁴⁰

XI. PROJECT COSTS

39. Applicants estimate that the Project as proposed will cost approximately \$6,700,000. Of that cost, the Transmission Line will cost approximately \$4,400,000; the new Otto Substation will cost approximately \$2,300,000, which includes costs to decommission and remove

³⁶ Application at 5.1.2.

³⁷ Application at 3.1.1.

³⁸ Application at 5.1.3.

³⁹ Application at 5.1.6.

⁴⁰ Application at 3.4.

the existing substation components. Costs may vary depending upon, among other things, the cost of material and labor.⁴¹

40. All capital costs for the Transmission Line infrastructure will be borne by Great River Energy. Costs related to the new Otto Substation will primarily be borne by LREC.⁴²

XII. PERMITTEES

41. The Permittees for the Project are Great River Energy and LREC.⁴³

XIII. PUBLIC AND LOCAL GOVERNMENT PARTICIPATION

42. Prior to submission of the Application, Great River Energy initiated, and has continued, individual outreach with all fourteen of the potentially affected landowners since December 2024.⁴⁴

43. Minn. Stat. § 216I.05 requires applicants to provide notice to each local unit of government within the Route, Minnesota Tribal governments, and state technical resource agencies.

44. In May 2025, Great River Energy sent initial notification letters to federal, state, and local agencies regarding the Project. These letters stated that Great River Energy intended to file a route permit application for the Project. Great River Energy also sent notification letters to additional agencies on the Agency Representatives Service List maintained by the Commission in September 2025.⁴⁵

45. Also in May 2025, Great River Energy sent notification letters to Tribal governments. These letters stated that Great River Energy intended to file a route permit application for the Project. Great River Energy then sent follow-up notification letters to the Tribal Historic Preservation Officers who did not respond to the May 2025 letter in September 2025. Great River Energy also sent notification letters to individuals on the Tribal Government Contacts Service List maintained by the Commission in September 2025.⁴⁶

XIV. FACTORS FOR A ROUTE PERMIT

46. The Minnesota Energy Infrastructure Permitting Act (MEIPA) provides that no person may construct a HVTL without a route permit from the Commission.⁴⁷ Under the statute, an HVTL includes a transmission line that is 100 kV or more and is greater than 1,500 feet in

⁴¹ Application at 3.3.

⁴² Application at 3.3.

⁴³ eDocket ID No. 202511-224627-01 (Application Filing Letter); and Application at 1.0.

⁴⁴ Application at 1.8.1.

⁴⁵ Application at 1.8.2.

⁴⁶ Application at 1.8.2, Appendix D.

⁴⁷ Minn. Stat. § 216I.05, subd. 3.

length.⁴⁸ The proposed 115 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.⁴⁹

47. MEIPA requires that route permit determinations must:

(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.⁵⁰

48. The Commissions determinations of whether to issue a permit under the MEIPA must include at minimum:

(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 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;

⁴⁸ Minn. Stat. § 216I.02, subd. 8.

⁴⁹ Application at 2.2.

⁵⁰ Minn. Stat. § 216I.05, subd. 11(a).

(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.⁵¹

49. 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.”⁵²

⁵¹ Minn. Stat. § 216I.05, subd. 11(b).

⁵² Minn. Stat. § 216I.05, subd. 11(e).

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

XV. APPLICATION OF ROUTING FACTORS TO THE PROPOSED ROUTE

A. Effects on Human Settlement.

51. Minnesota law requires consideration 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.⁵³

1. Displacement.

52. No residences or businesses will be displaced by the Project on the Proposed Route.⁵⁴

53. There are no residences, outbuildings, or structures associated with businesses within 100 feet of the Project. The structure nearest to the Transmission Line is a residence located 149 feet from the Proposed Alignment. The closest residence to the center of the new Otto Substation is approximately 700 feet to the northeast across 470th Avenue.⁵⁵

54. The Project routing and Substation location avoid displacement of residences, buildings, and businesses; therefore, no mitigation is proposed.⁵⁶

2. Noise.

55. The Minnesota Pollution Control Agency (MPCA) has established standards for the regulation of noise levels. The most restrictive MPCA noise limits are 60–65 A-weighted decibels (dBA) during the daytime and 50–55 dBA during the nighttime.⁵⁷

56. The primary noise receptors within the vicinity of the Project are residences and farmsteads.⁵⁸

57. Construction noise is expected to occur during daytime hours as the result of heavy equipment operation and increased vehicle traffic. Occasionally, construction noise may occur outside these hours or on a weekend if Great River Energy or LREC must work around customer schedules, line outages, or if the schedule has been significantly impacted due to delays or other factors.⁵⁹

⁵³ Minn. Stat. § 216I.05, subd. 4(a)(2).

⁵⁴ Application at 6.4.3.

⁵⁵ Application at 6.4.3.

⁵⁶ Application at 6.4.3.

⁵⁷ Minn. R. 7030.0040.

⁵⁸ Application at 6.4.6.1.

⁵⁹ Application at 6.4.6.1.

58. Construction activities will be performed with standard heavy equipment such as backhoes, cranes, boom trucks, and assorted small vehicles.⁶⁰

59. Noise associated with construction of the Project will be short term (ceasing upon completion of construction) and minimal.⁶¹

60. During operation, transmission lines can generate a small amount of sound energy from the corona effect—a small electrical discharge caused by the localized electric fields (EF) near energized components and conductors that ionize the surrounding air molecules. Corona noise from a transmission line occurs under foggy, damp, or rainy weather conditions and can create a crackling sound. Audible noise from the transmission lines is highest when exposed to heavy rain, defined as one inch per hour. During these events, however, the sound of the rain is typically greater than noise created by the corona effect. As a result, people do not normally hear noise from a transmission line during heavy rain.⁶²

61. Operational noise impacts are not anticipated because of the new Otto Substation. Noise levels from the Otto Substation will attenuate to 50 dBA before the LREC property boundary. Noise levels will be below 30 dBA at the nearest residence, well below Noise Area Classification (NAC) 1 noise standards, and even prior to accounting for, additional environmental mitigating factors between the Substation and the residence, such as vegetation or buildings.⁶³

62. Great River Energy will require its employees and contractors to equip heavy equipment with sound attenuation devices such as mufflers to minimize the daytime noise levels. To mitigate noise impacts, work will generally be limited to daytime hours between 7 a.m. and 9 p.m. on weekdays. Applicants will work with landowners in the event construction becomes necessary outside of these hours. Once operational, the Project is not anticipated to contribute to an exceedance of noise standards.⁶⁴

63. Section 5.3.6 in the Draft Route Permit addresses noise from the Project.

3. Aesthetics.

64. The Project will introduce new built features—structures, conductors, and a Substation—on the landscape.⁶⁵

65. The proposed Transmission Line and Otto Substation will be visible along the Proposed Route like other distribution and transmission lines, as well as the existing Otto Substation. The Project follows existing distribution lines for its entire length along 410th Street and 470th Avenue.⁶⁶

⁶⁰ Application at 6.4.6.1.

⁶¹ Application at 6.4.6.1.

⁶² Application at 6.4.6.1.

⁶³ Application at 6.4.6.1.

⁶⁴ Application at 6.4.6.2.

⁶⁵ Application at 6.4.1.1.

⁶⁶ Application at 6.4.1.1.

66. The new Otto Substation will replace the existing Otto Substation just south of the existing location within LREC's existing property. Although the structures and Otto Substation will be new, and they will vary in size and scope as compared to what is presently on site, they will not be materially different than the existing features.⁶⁷

67. The presence of transmission and distribution lines are a common occurrence in rural residential areas and are compatible with rural residential aesthetics. The viewshed will remain similar to existing conditions. Although distribution lines currently exist in the viewshed, the visual contrast added by the taller transmission structures and lines might be perceived as a visual disruption for some individuals.⁶⁸

68. The Applicants will work with landowners to identify concerns related to Project aesthetics and compensate landowners for removal of trees and vegetation based on easement agreements.⁶⁹

4. Socioeconomics.

69. Anticipated socioeconomic impacts related to the Project are expected to be positive, but minimal. Impacts will be small and occur over the long and short term.⁷⁰

70. During construction, there may be short-term positive impacts to the nearby communities, including a potential increase in local revenue may occur for businesses, such as hotels, grocery stores, gas stations and restaurants to support utility personnel and contractors. Some materials might be purchased locally, such as concrete. Generally, landowners will receive one-time payments for new easements.⁷¹

71. Long-term benefits of the Project include the ongoing reliable electrical services and the ability to serve existing and new local load growth. The benefits apply to the local community regardless of economic status, race, and personal identification.⁷²

5. Environmental Justice.

72. Minnesota Statute § 216B.1691, subdivision 1(e) defines environmental justice area as an area that meets one or more of the following criteria: (1) 40 percent or more nonwhite populations; (2) 35 percent or more households with income ≤ 200 percent of the poverty level; (3) 40 percent or more residents with limited English proficiency; or (4) Indian country as defined by 18 U.S.C. § 1151.⁷³

⁶⁷ Application at 6.4.1.

⁶⁸ Application at 6.4.1.1.

⁶⁹ Application at 6.4.1.2.

⁷⁰ Application at 6.4.9.1.

⁷¹ Application at 6.4.9.1.

⁷² Application at 6.4.9.1.

⁷³ Application at 6.4.4.

73. Census tracts that intersect with the Proposed Route were analyzed for environmental justice areas. No census tracts within the Project Area are considered environmental justice communities under the definition provided in Minn. Stat. § 216B.1691, subd. 1(e).⁷⁴

74. Because there are no statutorily defined environmental justice communities impacted by the Project, no mitigation is proposed.⁷⁵

1. Cultural Values.

75. Construction of the Project is not expected to conflict with work, leisure, or cultural pursuits in the Project Area. The Project will support Otter Tail County, both now and into the future, by increasing electrical reliability. Given that existing electric transmission and distribution lines already exist in the Project Area and that the Project will use existing distribution line right-of-way and construct a new Substation immediately adjacent to an existing substation that will be removed, the Project is not expected to interfere with the sense of place in the Project Area.⁷⁶

2. Recreation.

76. Recreational opportunities in Otter Tail County include fishing, boating, water sports, swimming, biking, hiking, hunting, cross-country skiing, and snowmobiling. There are no state, federal, or county parks, forests, refuges, or designated trails within the Local Vicinity, and the Proposed Route does not cross state or national wilderness areas or national parks. Recreation in the Local Vicinity likely occurs on private lands. The Otter Tail River State Water Trail runs about 0.5 miles west of the line; the nearest access is on Rush Lake, 2.5 miles southeast. The nearest snowmobile trail is one mile south of the Otto Substation, and Project activities would not affect off-trail riding along 410th Street and 470th Avenue.⁷⁷

77. The proposed Project avoids established recreational resources. Impacts to recreation are not anticipated; therefore, no mitigation is proposed.⁷⁸

3. Public Services and Transportation.

78. Private landowners in the Project Area have their own private wells and individual septic systems. Residents access other utility services from various providers, including waste collection, natural gas/propane, television, and telephone.⁷⁹

79. Local internet is provided by Park Region, Arvig, Spectrum/Charter Communications, and Century Link. Satellite internet is available from companies such as

⁷⁴ Application at 6.4.4.

⁷⁵ Application at 6.4.4.1-2.

⁷⁶ Application at 6.4.2.1.

⁷⁷ Application at 6.4.8.

⁷⁸ Application at 6.4.8.1.

⁷⁹ Application at 6.4.7.

Starlink. Local telephone service is provided by East Otter Tail Telephone Company. Mobile telephone companies also provide internet service.⁸⁰

80. Roads in the Project Area include U.S. Highway 10 and township roads. The Proposed Right-of-Way is collocated with road right-of-way for approximately 97 percent of its length. Perham Municipal Airport is 5.5 miles northwest (general aviation; 24 based aircraft; 7,169 take-offs/landings forecast 2028), and Wadena Municipal Airport is 16.5 miles southeast.⁸¹

81. Several existing overhead transmission and distribution lines are in the Project Area: Great River Energy maintains the LR-PR 115 kV line paralleling the north side of U.S. Highway 10; LREC provides electrical service, with distribution lines along 410th Street and 470th Avenue; the Proposed Right-of-Way follows these easements; and the OTP169 41.6 kV distribution follows the north side of 390th Street at the Otto Substation.⁸²

82. A 24-inch natural gas pipeline operated by Viking Gas Transmission Company crosses the Proposed Right-of-Way between mileposts (MPs) 1.3 and 1.4 on 470th Avenue. BNSF operates a railway northeast of the Project. U.S. Highway 10 generally parallels this railway but deviates from the railway near the Project. LREC will not bury distribution lines near the existing natural gas line and instead will construct the distribution lines overhead in this location.⁸³

83. During construction, short-term, minimal, and intermittent impacts will occur. Operational impacts are anticipated to be negligible. The Transmission Line and new Otto Substation are not expected to alter the condition or function of existing public services or transportation networks. Potential impacts will be temporary, small, and will not affect unique resources.⁸⁴

84. Sections 5.3.4 and 5.3.14 of the Draft Route Permit address utilities and infrastructure.

4. Land Use and Zoning.

85. The Project is not expected to alter current and future land use. Short-term agricultural impacts might occur during construction, which will be mitigated through restoration and compensatory payments.⁸⁵

86. The new Transmission Line structures will be along the outside edge of where existing agricultural fields are seeded and are not expected to interfere with existing or future agricultural practices.⁸⁶

⁸⁰ Application at 6.4.7.

⁸¹ Application at 6.4.7.

⁸² Application at 6.4.7.

⁸³ Application at 6.4.7.

⁸⁴ Application at 6.4.7.1.

⁸⁵ Application at 6.4.5.1.

⁸⁶ Application at 6.4.5.1.

87. The new Otto Substation will be located on land already owned by LREC.⁸⁷

88. The Project is not located in a Shoreland District (Otter Tail County, 2025a) and Otter Tail County does not have a county-wide zoning ordinance; therefore, the Project will not impact current zoning.⁸⁸

B. Effects on Public Health and Safety.

89. Minnesota's HVTL routing factors require consideration of the Project's potential effect on health and safety.⁸⁹

90. Impacts to human health and safety are assessed by looking at four main issues: interference, electric and magnetic fields, emergency services, and public worker safety.⁹⁰

1. Electronic Interference.

91. The likelihood of radio and television interference from the Project is minimal because the likelihood of significant corona formation on the Project is minimal. Great River Energy is unaware of any complaints related to radio or television interference resulting from the operation of any of its existing 115 kV facilities and does not expect radio and television interference to be an issue along the Proposed Route.⁹¹

92. Section 5.4.3 of the Draft Route Permit addresses electronic interference.

2. Electric and Magnetic Fields (EMF).

93. As it pertains to the Project, the term "EMF" refers to the extremely low frequency (ELF) decoupled EF and magnetic fields (MF) that are present around any electrical device or conductor.⁹²

94. There is no state or federal standard for transmission line EF levels. The EQB, however, developed a standard of a maximum EF limit of eight kV/m at one meter (3.28 feet) above ground; the Commission has adopted this standard.⁹³

95. There are no federal or Minnesota exposure standards for MFs. The EQB and the Commission have recognized Florida (a 150-mG limit) and New York (a 200-mG limit) state standards. Both state standards are calculated at the edge of right-of-way.⁹⁴

96. Applicants calculated EF associated with the Project. These calculations are based on the maximum operating voltage of the Transmission Line (126.5 kV). The Applicants indicate

⁸⁷ Application at 6.4.5.1.

⁸⁸ Application at 6.4.5.1.

⁸⁹ Minn. Stat. § 216I.05, subd. 4(a)(2).

⁹⁰ Application at 6.5- 6.5.4.

⁹¹ Application at 6.5.1.

⁹² Application at 6.5.2.

⁹³ Application at 6.5.2.

⁹⁴ Application at 6.5.2.

that “because the magnitude of the voltage on a transmission line is near-constant (ideally within +/- five percent of design voltage), the magnitude of the electric field will be near-constant regardless of the power flowing on the line.” The maximum electric field is approximately 1.55 kV/m. This field strength is well below the Commission permit standard of 8.0 kV/m.⁹⁵

97. The Project will comply with local and state codes, the National Electrical Safety Code (NESC), and Great River Energy/LREC standards for clearances, materials, and right-of-way widths. The Otto Substation will have protective breakers and relays to de-energize the line when needed, and will be secured with locked, barbed-wire fencing and hazard signage listing the owner and contact number. Applicants will meet safety requirements during construction and operation; guard structures will be used when stringing across roads or railroads to minimize traffic delays and protect the public. Great River Energy will also work with landowners on induced current and stray voltage concerns, coordinating with the customer’s service provider for technical review or on-site investigation.⁹⁶

98. Because electric and magnetic fields are not expected to be an issue along the Proposed Route, no additional EMF-specific mitigation is proposed.⁹⁷

3. Emergency Services.

99. Emergency services near the Project are provided by the Otter Tail County Sheriff’s Office, Perham Police Department, and New York Mills Police Department for law enforcement; the Perham and New York Mills Fire Departments for fire protection; and Perham Area Emergency Medical Services (EMS) for ambulance service. The New York Mills Fire Department has four trained EMTs. The nearest emergency room is Sanford Perham Health Clinic, with an additional ER at Astera Health in Wadena. Nearby Detroit Lakes (Becker County) also offers care at Essentia Health St. Mary’s-Detroit Lakes Hospital and Sanford Health Detroit Lakes Clinic. Detroit Lakes lies approximately 20 miles north on U.S. Highway 10.⁹⁸

100. Construction could affect emergency services by requiring responses to incidents or temporarily hindering access. Great River Energy will prioritize emergency response over construction and ensure responders can access work areas. U.S. Highway 10 will be briefly closed during conductor stringing; the closure and detour will be coordinated with local road authorities and emergency responders. With these measures, construction is not expected to adversely affect emergency services.⁹⁹

101. Because the Applicants anticipate that impacts to emergency services will be negligible, no mitigation is proposed.¹⁰⁰

⁹⁵ Application at 6.5.2 – 6.5.2.1, and Table 20.

⁹⁶ Application at 6.5.2 – 6.5.2.2.

⁹⁷ Application at 6.5.2 – 6.5.2.2.

⁹⁸ Application at 6.5.3.

⁹⁹ Application at 6.5.3.1.

¹⁰⁰ Application at 6.5.3.2.

4. Public and Worker Safety.

102. Potential worker hazards present at a transmission line or substation construction site are similar to those at most large construction sites. Generally, safety concerns include electrocution, falls, confined spaces, fires and explosions, sprains, strains, fractures, and environmental stress. Transportation-related accidents are also a significant risk for all industries.¹⁰¹

103. 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.¹⁰²

104. The new Otto Substation will be fenced, gated, and locked.¹⁰³

105. Applicants will meet or exceed the design, construction, and operational requirements of the NESC, North American Electric Reliability Corporation requirements, state and local codes¹⁰⁴

106. The Applicants or their contractor will provide or require necessary safety equipment, including fall arrest equipment, and provide daily “tailgate” safety trainings. All work must comply with Occupational Safety and Health Administration requirements. Downed transmission lines are deenergized either automatically by breakers or manually by switches and other safety equipment in substations.¹⁰⁵

C. Effects on Land-Based Economies.

107. Minnesota’s HVTL routing factors require consideration of the Project’s impacts to land-based economies—specifically, agriculture, forestry, tourism, and mining.¹⁰⁶

1. Agriculture.

108. Otter Tail County has 2,497 individual farms with an average farm size of 309 acres and covering approximately 770,922 acres (about 61 percent) of the county. Approximately \$551 million was generated from crop and livestock sales in 2022.¹⁰⁷

109. The Proposed Route consists of about 22 acres of cultivated cropland and five acres of pasture/hay lands.¹⁰⁸

110. Potential impacts to agriculture are anticipated to be short term and minimal. There will be no impacts to prime farmland. The Proposed Right-of-Way is consistent for use as pasture, hay, or other crop cultivation. The new Otto Substation is on private land owned by LREC that is

¹⁰¹ Application at 6.5.4.

¹⁰² Application at 6.5.4.1.

¹⁰³ Application at 6.5.4.1.

¹⁰⁴ Application at 6.5.4.2.

¹⁰⁵ Application at 6.5.4.2.

¹⁰⁶ Minn. Stat. § 216I.05, subd. 4(a)(3).

¹⁰⁷ Application at 6.6.1.

¹⁰⁸ Application at 6.6.1.

not in agricultural production; therefore, no impacts to agricultural production from the Substation are anticipated.¹⁰⁹

111. If drain tile is present in the disturbance area it could be damaged when augering holes for structures; however, irrigated fields, like the ones present along the Proposed Route, typically do not have drain tiles.¹¹⁰

112. Agricultural land could be taken out of production during construction of the Transmission Line; however, farming would resume after restoration is complete. Only structure locations would be precluded from future farming activities.¹¹¹

113. The Proposed Alignment will cross along the outer edges of 800 feet of center-pivot irrigated fields. Center-pivot irrigation is generally compatible with transmission lines on its outer edges. In some situations where an end gun sprayer is in use, the sprayer may need to be adjusted to prevent spraying directly onto the Transmission Line. Great River Energy coordinates with landowners regarding any modifications required on the irrigation system.¹¹²

114. The Applicants are committed to working with landowners “to minimize impacts to agricultural activities,” compensating landowners “for any crop damage/loss and soil compaction that may occur during construction,” and repairing and restoring areas disturbed during construction to pre-construction condition.¹¹³

2. Forestry.

115. Some forested areas exist in association with the wetland complex that is bisected by 470th Avenue, but none of the areas crossed by the Proposed Route are currently in commercial forestry operation.¹¹⁴

116. The Project will not result in any impact on commercial forestry operations; therefore, no mitigation is proposed.¹¹⁵

3. Mining.

117. There are no mapped MDNR identified gravel pits within the Proposed Route. The Applicants confirmed this through desktop aerial imagery analysis. Additionally, there are no MDNR active mineral leases within the Proposed Route. Mining operations are not present in the Proposed Route; therefore, impacts will not occur. No mitigation is proposed.¹¹⁶

¹⁰⁹ Application at 6.6.1.1.

¹¹⁰ Application at 6.6.1.1.

¹¹¹ Application at 6.6.1.1.

¹¹² Application at 6.6.1.1.

¹¹³ Application at 6.6.1.1.

¹¹⁴ Application at 6.6.2, 6.6.2.1.

¹¹⁵ Application at 6.6.2.2.

¹¹⁶ Application at 6.6.3.

4. Tourism.

118. Tourism associated with outdoor recreational opportunities is most associated with publicly accessible lands and waters.¹¹⁷

119. There are no public lands or regional or community events in the Local Vicinity. As such, potential impacts are not expected to occur. No mitigation is proposed.¹¹⁸

D. Effects on Archaeological and Historic Resources.

120. Minnesota law requires consideration of the effects of the Project on historic and archaeological resources.¹¹⁹

121. The Applicants retained a consultant, Merjent, Inc. (Merjent) to evaluate the potential presence of cultural resources in and near the Project Area. Merjent conducted a cultural resource literature review of a 1-mile-wide buffer centered on the Proposed Alignment and Otto Substation referred to in this section as the Study Area. This literature review and Merjent's evaluation of the possible effects of the proposed Project on historic properties in the Study Area was provided to the Minnesota State Historic Preservation Office (SHPO) in a letter dated June 24, 2025.¹²⁰

122. Applicants requested feedback on the Project from the 11 federally recognized Tribes with geography within Minnesota, the 1854 Treaty Authority, MIAC, and Tribes outside of Minnesota with interest in the Project Area in its Project notification letters sent in May 2025. To date, three Tribes, along with MIAC, have responded.¹²¹

123. Three archaeological sites, six historic structures, and three potential historic cemeteries were identified within the Study Area. One archaeological site intersects the Project, but it has been destroyed due to road construction. Two historic cemeteries potentially overlap the Project according to historic documents. One historic structure intersects the Project, but it has already been determined Not Eligible for listing on the National Register of Historic Places.¹²²

124. Given that the Project is proposed within an already disturbed right-of-way, there is a low potential for intact archaeological sites. The existing Otto Substation has had ground disturbance associated with the installation of the Substation, the gravel lot, and the fence surrounding the Substation. Ground disturbing work for the new Otto Substation will occur in the same area, immediately south of the existing substation.¹²³

125. Finally, the precise location of a cemetery (the Cole Cemetery) identified by Merjent was not located during review of historic aerials, historic atlases, and topographic maps.

¹¹⁷ Application at 6.6.4.

¹¹⁸ Application at 6.6.4.

¹¹⁹ Minn. Stat. 216I.05, subd. 4(a)(4).

¹²⁰ Application at 6.7.

¹²¹ Application at 6.7, Appendix D.

¹²² Application at 6.7.1.

¹²³ Application at 6.7.1.

As a result, there is potential for the new Otto Substation to overlap with the Cole Cemetery as both are located within T135N, R38W, Section 7.¹²⁴

126. SHPO confirmed Merjent's recommendation for a field survey and requested an evaluation of a precontact campsite previously noted as destroyed by the construction and widening of both U.S. Highway 10 and 410th Street. The Applicants will complete a Phase I Archaeological Survey for the Project prior to construction. As part of this work, the Applicants will perform a survey of the Cole Cemetery to confirm that there is no evidence of the Cole Cemetery within the Project Area.¹²⁵

127. If any archaeological sites are identified during placement of the poles along the permitted Route, construction work will be stopped and SHPO staff consulted as to how to proceed. If human remains are encountered during construction activities, all ground disturbing activity will cease, and local law enforcement will be notified.¹²⁶

128. If a resource is encountered, the Permittee shall consult with the SHPO and the State Archaeologist. Where feasible, avoidance of the resource is required. Where not feasible, mitigation must include an effort to minimize project impacts on the resource consistent with SHPO and State Archaeologist requirements. Prior to construction, the Permittee shall train workers about the need to avoid cultural properties, how to identify cultural properties, and procedures to follow if undocumented cultural properties, including gravesites, are found during construction. If human remains are encountered during construction, the Permittee shall immediately halt construction and promptly notify local law enforcement and the State Archaeologist. The Permittee shall not resume construction at such location until authorized by local law enforcement or the State Archaeologist.¹²⁷

E. Effect on Natural Environment.

129. Minnesota's HVTL routing factors require consideration of the Project's effect on the natural environment, including effects on air and water quality resources and flora and fauna.¹²⁸

1. Air Quality.

130. 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.¹²⁹

¹²⁴ Application at 6.7.1.

¹²⁵ Application at 6.7.2.

¹²⁶ Application at 6.7.2.

¹²⁷ Application at 6.7.2.

¹²⁸ Minn. Stat. 216I.05, subd. 4(a)(5).

¹²⁹ Application at 6.8.1.1.

131. During construction of the Transmission Line and the new Otto Substation, temporary air emissions will occur from the operation of construction equipment, vehicular traffic, and soil disturbance. Construction activities will be performed with standard heavy equipment such as backhoes, cranes, boom trucks, and assorted small vehicles.¹³⁰

132. During operation, power lines produce ozone and nitrous oxide through the corona effect—the ionization of air molecules surrounding the conductor. Ozone production from a conductor is proportional to temperature and sunlight and inversely proportional to humidity.¹³¹

133. Corona-induced ozone and nitrogen oxides (NOX) are typically not a concern for transmission lines with operating voltages below 161 kV, like the Project, because the EF intensity is too low to produce significant corona. Ozone and NOX concentrations associated with the Project are anticipated to be negligible, and well below all federal standards. There would be no operational emissions from the Otto Substation.¹³²

134. The Applicants will use appropriate measures to minimize fugitive dust emissions during construction.¹³³

135. At the completion of construction activities, all construction-related air impacts would cease.¹³⁴

2. Surface Waters and Wetlands.

136. No floodplains are mapped within the Proposed Route. The Proposed Route crosses two ponds associated with the wetland complex that is crossed by 470th Avenue. These unnamed ponds are approximately 0.5 acre in size. The ponds are spaced such that they can be spanned to avoid direct impacts during construction.¹³⁵

137. The Project will not impact impaired waters and will not cause a water to be newly listed as impaired.¹³⁶

138. Construction of the Project largely avoids wetlands, except for a 9-foot crossing at MP 0.0, a 164-foot crossing near MP 0.1, and a 152-foot crossing near MP 2.6. Based on the Proposed Alignment, Great River Energy does not anticipate pole placement within wetlands. If the final Transmission Line route design cannot enable the Project to span discrete wetland segments, permanent impacts to wetlands will occur where a structure is in the wetland (approximately 18 to 60 inches in diameter of permanent impact per structure). The Proposed

¹³⁰ Application at 6.8.1.1.

¹³¹ Application at 6.8.1.

¹³² Application at 6.8.1.1.

¹³³ Application at 6.8.1.2.

¹³⁴ Application at 6.8.1.2.

¹³⁵ Application at 6.8.8, 6.8.8.1.

¹³⁶ Application at 6.8.8, 6.8.8.1.

Right-of-Way crosses 0.24 acres of forested wetland that could require clearing; therefore, limited conversion of wetland type could occur. These impacts are generally considered permanent.¹³⁷

139. Wetland impact avoidance measures that will be implemented during design and construction of the Transmission Line include spacing and placing the pole structures at variable distances to span and avoid all wetlands. Soil compaction within wetlands is not expected but would be mitigated by construction during frozen conditions or installation of construction mats.¹³⁸

140. The Applicants and their contractors will employ erosion and sediment control BMPs near the wetland crossing under 470th Avenue to minimize runoff during construction and could include but are not limited to the installation of sediment barriers (silt fence, straw bales, bio-logs), filter socks, mulch, upslope diversions, and slope breakers.¹³⁹

3. Groundwater.

141. The Project is within the Central Groundwater Province, which is characterized by buried sand aquifers and relatively extensive surficial sand plains, part of a thick layer of sediment deposited by glaciers overlying the bedrock.¹⁴⁰

142. The County Well Index indicates that there are two wells located within the Proposed Route; one well is within the Proposed Right-of-Way. The nearest well is 8.5 feet away from the Proposed Right-of-Way. This well is a monitor well owned by the MDNR.¹⁴¹

143. It is possible that pole installation or substation site preparation will encounter groundwater. Excavations may therefore require construction dewatering. Any effects on water tables would be localized and short term and would not result in significant impacts to hydrologic resources.¹⁴²

144. Applicants will coordinate with landowners regarding well locations and access, should it be necessary.¹⁴³

4. Wildlife and Habitat.

145. There are no MDNR Wildlife Management Areas or Aquatic Management Areas (MDNR, 2025o) crossed by the Proposed Route. There are no MDNR-designated Lakes of Biological Significance, Wild Rice Lakes, Trout Lakes, Trout Streams, Outstanding Resource Waters or Priority Shallow Lakes within the Proposed Route. Designated important bird areas do not exist with the Proposed Route.¹⁴⁴

¹³⁷ Application at 6.8.8.1.

¹³⁸ Application at 6.8.8.2.

¹³⁹ Application at 6.8.8.2.

¹⁴⁰ Application at 6.8.9.

¹⁴¹ Application at 6.8.9.

¹⁴² Application at 6.8.9.1.

¹⁴³ Application at 6.8.9.2.

¹⁴⁴ Application at 6.8.10.

146. Construction of the Project poses minimal risk of permanent wildlife displacement or habitat loss. Wildlife in natural areas along the Proposed Route may experience short-term, localized disturbance during construction. Displacement distances will vary by species. Affected animals are typical of agricultural settings and are not expected to experience population-level effects from construction.¹⁴⁵

147. The Proposed Right-of-Way will parallel existing road right-of-way and follow distribution line right-of-way for about 97 percent of its length; therefore, there will be minimal impacts related to habitat fragmentation and habitat loss.¹⁴⁶

148. Raptors, waterfowl, and other bird species might be affected by the construction and placement of the Transmission Line. Avian collisions could occur during operation of the Transmission Line.¹⁴⁷

149. Any eagle nests discovered during survey of the Transmission Line or in the land acquisition process will be reported, as applicable, to the USFWS and Great River Energy will adhere to the guidance provided. USFWS recommended that bird diverters be placed along the Transmission Line near Albert Lake. No additional mitigation measures are proposed.¹⁴⁸

5. Geology and Topography.

150. Bedrock depth in this subregion varies from 100 to 500 feet. Depth to bedrock along the Project Route varies from approximately 330 to 380 feet.¹⁴⁹

151. Given the depth to bedrock along the Project Route, transmission line structures or their foundations, as well as substation foundations, will not impact subsurface geologic features.¹⁵⁰

152. Construction of the Project will not alter the geology and topography along the Proposed Right-of-Way; therefore, no mitigation is proposed.¹⁵¹

6. Soils.

153. Potential impacts include soil compaction associated with construction equipment traffic and exposing soil to wind and water erosion. Ground disturbance and soil exposure would be primarily limited to the structure locations, which would typically consist of a hole 10 to 20 feet deep and 36 to 60 inches in diameter for each structure and footers for substation equipment. Long-term impacts are not expected.¹⁵²

¹⁴⁵ Application at 6.8.10.1.

¹⁴⁶ Application at 6.8.10.1.

¹⁴⁷ Application at 6.8.10.1.

¹⁴⁸ Application at 6.8.10.2.

¹⁴⁹ Application at 6.8.4.

¹⁵⁰ Application at 6.8.4.1.

¹⁵¹ Application at 6.8.4.2.

¹⁵² Application at 6.8.6.1.

154. Applicants will take measures to alleviate soil compaction; and exposed soil will be revegetated as soon as possible to minimize erosion.¹⁵³

155. Potential impacts to soils can be mitigated by using best management practices (BMPs) and standard construction practices. A variety of methods can be employed to minimize soil erosion, including the prompt revegetation of disturbed soils. Additionally, Section 5.3.8 of the Draft Route Permit has requirements that the permittee must follow to mitigate impacts to soil.¹⁵⁴

7. Greenhouse Gas Emissions (GHG).

156. Greenhouse gases (GHG) are gaseous emissions that trap heat in the atmosphere. The most common GHGs emitted from human activities include carbon dioxide, methane, and nitrous oxide.¹⁵⁵

157. Sulfur hexafluoride (SF₆), a GHG, is used as an insulating material in substation breakers. Under normal operations and with adequate routine maintenance, the SF₆ remains contained in the breakers and is not released to the atmosphere.¹⁵⁶

158. Construction of the Transmission Line and the new Otto Substation will result in a temporary increase of GHG emissions from fuel combustion in construction equipment and associated vehicles. No new greenfield right-of-way will be cleared; therefore, no GHG emissions related to land use change were calculated and impacts from deforestation are negligible.¹⁵⁷

159. GHG emissions associated with operation of the Project include vehicle and equipment emissions related to inspections and maintenance activities. Impacts from operation of the Project will be intermittent and short term.¹⁵⁸

160. Minnesota Rule 4410.4300, Subpart 15, Part B, establishes a mandatory category requiring preparation of an EA Worksheet for stationary source facilities generating 100,000 tons of GHGs per year. Accordingly, the preliminary estimate of Project GHG emissions, when compared to statewide levels and to the regulatory requirement for additional study for projects based on GHGs, would be negligible.¹⁵⁹

161. The Applicants will mitigate vehicle emissions by ensuring its construction contractor keeps equipment in good working order and limits vehicle idling. Applicants will monitor the 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

¹⁵³ Application at 6.8.6.2.

¹⁵⁴ Application at 6.8.6.2.

¹⁵⁵ Application at 6.8.3.

¹⁵⁶ Application at 6.8.3.

¹⁵⁷ Application at 6.8.3.1

¹⁵⁸ Application at 6.8.3.1

¹⁵⁹ Application at 6.8.3.1, Table 23.

breaker to be repaired. Any gas collected from decommissioned breakers is shipped offsite for recycling. No additional mitigation is proposed.¹⁶⁰

8. Climate Change Resilience.

162. Climate resilience is the capacity of a community or environment to anticipate and manage climate impacts, minimize their damage, and recover and transform as needed after the initial shock. Potential impacts are anticipated to be long term, of a small size, and not affect a unique resource. While total precipitation is expected to increase as well as the intensity of future storms, models indicate that precipitation totals over one inch are not expected to increase significantly over current levels. Therefore, increased risks associated with flooding are not anticipated.¹⁶¹

163. Models show that more electricity will be needed to cool homes. The Project helps to maintain the resiliency of the electrical grid in Otter Tail County, helping to protect LREC customers from extreme heat events. This impact will be long term and positive.¹⁶²

164. Climate change could result in an increased risk of flooding in the Project Area, increased temperatures, extreme weather events such as high winds, and excessive rainfall. The Project as proposed will be designed to withstand these changes and will increase reliability in the Project Area.¹⁶³

165. Transmission lines and substations are designed with extreme weather in mind, mitigating potential effects from the chance of increased number and intensity of severe storms. Applicants do not propose additional mitigative measures specific to climate change.¹⁶⁴

9. Rare and Unique Natural Resources.

(1) State-Listed Species.

166. Applicants submitted a formal Natural Heritage Review Request on April 15, 2025, through the MDNR. Review concluded the MDNR “[does] not believe the proposed project will negatively affect any known occurrences of rare features.”¹⁶⁵

(2) Federally-Listed Species.

167. Based on the official species list provided by the United States Fish and Wildlife Service (USFWS), one species federally listed under Endangered Species Act and three candidate species have been previously documented within the Project Vicinity. No federally designated

¹⁶⁰ Application at 6.8.3.1, Table 23.

¹⁶¹ Application at 6.8.2.1.

¹⁶² Application at 6.8.2.1.

¹⁶³ Application at 6.8.2.1.

¹⁶⁴ Application at 6.8.2.2.

¹⁶⁵ Application at 6.8.5.

critical habitat is present within the Project Area. Those species are the gray wolf, monarch butterfly, Suckley’s cuckoo bumble bee, and the western regal Fritillary.¹⁶⁶

(3) Potential Impacts.

168. The Project does not cross High Conservation Value Forest, Minnesota Biological Survey (MBS) Native Plant Communities (including native prairie), MBS Sites of Biodiversity Significance, or Scientific and Natural Areas. Potential impacts to these resources are not expected to occur.¹⁶⁷

169. MDNR also confirmed that the Project “will not negatively affect any known occurrences of rare features...”¹⁶⁸

170. Gray wolves are habitat generalists. Should wolves be present along the Proposed Route they would be displaced during construction but would return once construction is complete. Therefore, impacts to the gray wolf, if they occur, are anticipated to be minimal.¹⁶⁹

171. Constructing adjacent to existing distribution line right-of-way and across agricultural fields minimizes impacts to suitable habitat for the monarch butterfly and Suckley’s cuckoo bumble bee. Long-term impacts to suitable habitat are not anticipated.¹⁷⁰

172. The western regal fritillary uses native prairie habitat. No native prairie habitat is present within the Proposed Route. If USFWS determines the any of these species should be listed, and protections for the species coincide with the Project, the Applicants will review Project activities for potential impacts and develop appropriate avoidance and mitigation.¹⁷¹

173. The Applicants reviewed aerial imagery and determined that suitable habitat for bald eagle activity, foraging areas, nests, and winter roost areas is present within two miles of the Project. The Applicants will comply with the requirements of the federal Bald and Golden Eagle Protection Act (BGEPA).¹⁷²

174. The Applicants will continue to coordinate with the MDNR and USFWS to avoid and minimize impacts on sensitive species.¹⁷³

¹⁶⁶ Application at 6.8.5, Appendix C.

¹⁶⁷ Application at 6.8.5.1.

¹⁶⁸ Application at 6.8.5.1.

¹⁶⁹ Application at 6.8.5.1.

¹⁷⁰ Application at 6.8.5.1.

¹⁷¹ Application at 6.8.5.1.

¹⁷² Application at 6.8.5.1.

¹⁷³ Application at 6.8.5.2.

F. Use of or Paralleling of Existing Railroad and Highway Rights-of-Way, Survey and Division Lines, and Existing High-Voltage Transmission Rights-of-Way.

175. Minnesota's HVTL routing factors require consideration of the Project's use of or paralleling of existing right-of-way, survey lines, and natural division lines.¹⁷⁴

176. Approximately 2.9 miles, or 97 percent, of the Project will be collocated within existing road and utility right-of-way. Where the Project does not collocate with existing right-of-way, it is within existing road right-of-way (the U.S. Highway 10 crossing).¹⁷⁵

G. Electrical System Reliability.

177. Minnesota's HVTL routing factors require consideration of the Project's impact on electrical system reliability.¹⁷⁶

178. The Project is designed to operate at 115 kV to serve increased electrical demand into the future and help to ensure electric reliability in Otter Tail County. An average 115 kV transmission line is expected to be available approximately 99.9 percent of the year. Great River Energy expects that this Transmission Line should not be out of service for any extended period, other than the rare times when scheduled maintenance is required or when an event, such as a tornado, thunderstorm, ice storm, or a vehicle or heavy equipment collides with a structure causes an outage.¹⁷⁷

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

179. Minnesota's HVTL routing factors require consideration of the Project's cost of construction, operation, and maintenance.¹⁷⁸

180. Applicants estimate that the Project as proposed will cost approximately \$6,700,000. Of that cost, the Transmission Line will cost approximately \$4,400,000; the new Otto Substation will cost approximately \$2,300,000, which includes costs to decommission and remove the existing substation components. Costs may vary depending upon, among other things, the cost of material and labor. Applicants currently anticipate that costs may vary \pm 30 percent.¹⁷⁹

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

181. Minnesota's HVTL routing factors require consideration of the adverse human and natural environmental effects that cannot be avoided.¹⁸⁰

¹⁷⁴ Minn. Stat. § 216I.05, subd. 3(7) and subd. 11(b)(8)-(9) & (e).

¹⁷⁵ Application at 3.1.2.

¹⁷⁶ Minn. Stat. § 216I.05, subd. 11(b)(13).

¹⁷⁷ Application at 3.1.11-12.

¹⁷⁸ Minn. Stat. § 216I.05, subd. 3(b)(9).

¹⁷⁹ Application at 3.3.

¹⁸⁰ Minn. Stat. § 216I.05, subds. 4(a)(9), 11(b)(6).

182. Unavoidable adverse impacts due to construction of the Project include: fugitive dust emissions on and near gravel roads; greenhouse gas emissions; incremental vegetative clearing; minimal amounts of habitat loss; noise disturbances and visual impacts; soil compaction and erosion; short-term traffic delays; temporary construction dewatering; and temporary disturbance and displacement of wildlife, including impacts to individual wildlife.¹⁸¹

183. Unavoidable adverse impacts due to the operation of the Project include: continued maintenance of tall growing woody vegetation; conversion of agricultural land at structure locations and maintained grasslands at the new Otto Substation location; increased EMF on the landscape; potential impacts from EMF are minimal and not expected to impact human health; incremental increase in the potential for avian collisions or electrocution; interference with AM radio signals; limited GHG emissions; incremental visual changes to the landscape.¹⁸²

J. Irreversible and Irrecoverable Commitments of Resources.

184. Minnesota's HVTL routing factors require consideration of the irreversible and irrecoverable commitments of resources that are necessary for the Project.¹⁸³

185. Irreversible resource commitments associated with the Project will include the land use associated with the new Otto Substation and Transmission Line components. While the land underlying the Otto Substation could be restored to agricultural use or some other function, tall growing woody vegetation could revegetate within the Proposed Right-of-Way, and certain Project components could be reused or recycled, this is unlikely to happen in the reasonably foreseeable future.¹⁸⁴

186. Irrecoverable 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 irrecoverable. Funding could be irrecoverable in part.¹⁸⁵

K. CUMULATIVE IMPACTS

187. Cumulative effects are defined as "effect on the environment that results from the incremental effects of a project in addition to other projects in the environmentally relevant area that might reasonably be expected to affect the same environmental resources, including future projects actually planned or for which a basis of expectation has been laid, regardless of what person undertakes the other projects or what jurisdictions have authority over the projects."¹⁸⁶

188. The Applicants searched for reasonably foreseeable projects in both temporal and spatial proximity to the Proposed Project. No projects were identified. The Minnesota Department of Transportation (MnDOT) is planning to resurface U.S. Highway 10 from Bluffton west to New York Mills in 2027. This Project is about eight road miles from where the Proposed Project will

¹⁸¹ Application at 6.9.

¹⁸² Application at 6.9.

¹⁸³ Minn. Stat. § 216I.05, subd. 11(b)(11).

¹⁸⁴ Application at 6.10.

¹⁸⁵ Application at 6.10.

¹⁸⁶ Minn. R. 4410.0200, subd. 11(a).

intersect U.S. Highway 10. Otter Tail County road work plans do not extend beyond 2025 on the county website.¹⁸⁷

XVI. ROUTE PERMIT CONDITIONS

189. The Draft Route Permit filed by EIP Staff on January 7, 2026, includes standard permit conditions and three special permit conditions specific to the Project.

190. In comments filed on February 19, 2026, Great River Energy proposed limited revisions to Sections 2.2 and 3 of the Draft Route Permit to reflect Project-specific details. Great River Energy also proposed revisions to Conditions 5.1, 5.3.9, 5.3.16, 6.1, 6.3, 9.2, and 9.3. The proposed revisions are generally minor clarifications and are supported by the record. Great River Energy also requested the addition of two permit conditions – one related to vegetation clearing, and one related to substation construction.¹⁸⁸ Both conditions are supported by the record and consistent with other recent permits issued by the Commission.

XVII. NOTICE

191. Minnesota statutes and rules require an Applicant to provide certain notice to the public and local governments regarding a route permit process.¹⁸⁹

192. The Applicants provided notice to the public and local governments in satisfaction of Minnesota statutory and rule requirements.¹⁹⁰

193. EIP Staff likewise provided notices in satisfaction of Minnesota statutes and rules.¹⁹¹

XVIII. COMPLETENESS OF EA

194. The EA process is the alternative environmental review approved for HVTLs pursuant to the Standard Review Process.¹⁹²

195. The evidence in the record demonstrates that the EA is adequate. On January 7, 2026, and following the December 3 and 4, 2025, public information and scoping meetings, Commission EIP Staff submitted a Scoping Summary and Recommendations, finding that an EA addendum is not required for the Project.¹⁹³

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

¹⁸⁷ Minn. R. 4410.0200, subd. 11(a).

¹⁸⁸ Great River Energy Comment.

¹⁸⁹ Minn. Stat. § 216I.05, subd. 5.

¹⁹⁰ Application at 1.8.2, 2.3.2, Appendices C-D.

¹⁹¹ Notice of Completeness and Public Meetings; of Public Hearings and Draft Route Permit.

¹⁹² Minn. Stat. § 216I.07, subd. 3.

¹⁹³ EIP Summary and Recommendations.

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 November 18, 2025.¹⁹⁴
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 the revisions discussed in Section XVI, above.
12. Any of the foregoing Conclusions of Law which are more properly designated Findings of Fact are hereby adopted as such.

¹⁹⁴ Notice of Completeness and Public Meetings.

**In the Matter of Application of Great
River Energy and Lake Region Electric
Cooperative for a Route Permit for the
Otto Tap 115-kV Transmission Line
Project in Otter Tail County, Minnesota**

CERTIFICATE OF SERVICE

MPUC Docket No. ET2/TL-25-269

Breann L. Jurek certifies that on the 25th day of February 2026, she e-filed on behalf of Great River Energy, with the Minnesota Public Utilities Commission via eDockets (www.edockets.state.mn.us), a true and correct copy of this Response to Public Hearing Comments and Proposed Findings of Fact and Conclusions of Law.

Said documents were also served on the Official Service List of record on file with the Minnesota Public Utilities Commission and as attached hereto.

Executed on: February 25, 2026

Signed: /s/ Breann L. Jurek

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	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	25-269 Official CC Service List
2	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	25-269 Official CC Service List
3	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	25-269 Official 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	25-269 Official CC Service List
5	Craig	Janezich	craig.janezich@state.mn.us		Public Utilities Commission	121 7th PI E #350 St. Paul MN, 55101 United States	Electronic Service		No	25-269 Official CC Service List
6	Breann	Jurek	bjurek@fredlaw.com	Fredrikson & Byron PA		60 S Sixth St Ste 1500 Minneapolis MN, 55402 United States	Electronic Service		No	25-269 Official CC Service List
7	Joseph	Meyer	joseph.c.meyer@state.mn.us		Office of Administrative Hearings	PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		Yes	25-269 Official 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		Yes	25-269 Official CC Service List
9	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	25-269 Official CC Service List
10	Suzanne	Steinhauer	suzanne.steinhauer@state.mn.us		Public Utilities Commission	121 7th Place E, Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	25-269 Official CC Service List
11	Mark	Strohfus	mstrohfus@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	25-269 Official CC Service List
12	Haley	Waller Pitts	hwallerpitts@fredlaw.com	Fredrikson & Byron, P.A.		60 S Sixth St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	25-269 Official CC Service List