

November 18, 2025

Mark Strohfus
Great River Energy
12300 Elm Creek Blvd.
Maple Grove, MN 55369

RE: Application Completeness Determination
Otto Tap 115 kV Transmission Line Project – Route Permit Application
Docket No. ET2/TL-25-269

Dear Mr. Strohfus,

On November 3, 2025, Great River Energy and Lake Region Electric Cooperative (collectively, applicants) filed a route permit application with the Minnesota Public Utilities Commission (Commission) for the Otto Tap 115 kV Transmission Line Project (project). As required by Minnesota Statute §216I.05, subd. 7, the Commission must determine whether an application is complete and advise applicants of any deficiencies within ten working days of the date an application is received.

On August 5, 2025, Great River Energy provided Commission Energy Infrastructure Permitting (EIP) staff with a draft of the route permit application for preapplication review as required in Minnesota Statute §216I.05, subd. 6. EIP staff responded to the applicant on September 25, 2025, with recommendations focused on completeness and clarifications that may assist the commission's review of the application.

The Commission may accept an application as complete, reject an application, or accept an application as complete if missing information is not essential to provide adequate notice and may be obtained from the applicant prior to the initial public meeting.¹

Commission EIP staff have reviewed the filed application for consistency with Minnesota Statute §216I.05. Staff conclude that the route application filed on November 3, 2025, largely satisfies the application content requirements of Minnesota Statute §216I.05, but requests applicants make a supplemental filing no later than December 2, 2025, that includes:

- Documentation of follow-up phone calls with the Tribal Historic Preservation Offices from the seven tribes that have not responded to previous e-mail and US mail contact.
- Documentation that applicants provided project and applicant contact information to four members of the “Agency Reps” service list in eDockets not indicated in Appendix C.
- Additional resources (e.g. local governments, MISO Queue, EQB Database) applicants reviewed when developing the section on cumulative potential effects.

¹ Minnesota Statute §216I.05, subd. 7

Based on review of the submissions filed in this matter, Commission EIP staff have advised me, and I agree, that the route permit application submitted by the applicants is sufficiently complete in accordance with Minnesota Statute §216I.05 to proceed with the public information meeting.

Please contact the EIP project managers, Suzanne Steinhauer at suzanne.steinhauer@state.mn.us, 651-201-2253 or Craig Janezich at craig.janezich@state.mn.us, 651-201-2203, if you have questions or would like to discuss further.

Sincerely,

A handwritten signature in black ink that reads "Sasha Bergman". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Sasha Bergman
Executive Secretary

APPLICATION COMPLETENESS FILING REVIEW

Otto Tap 115 kV Transmission Project

DOCKET NO. ET2/TL-25-269

On November 3, 2025, Great River Energy and Lake Region Electric Cooperative filed a route permit application for the Otto Tap 115 kV transmission line project with the Minnesota Public Utilities Commission (Commission). As required by Minnesota Statute §216I.05, subd. 7, the Commission must determine whether an application is complete and advise applicants of any deficiencies within ten working days of the date an application is received.

This application completeness review addresses the completeness of the route permit application and requests that an administrative law judge from the Court of Administrative Hearings conduct the public hearings for the project and prepare a report.²

Documents Attached:

- (1) Figure 1. Project Overview Map
- (2) Table 1. Application Completeness Requirements

Introduction and Background

On November 3, 2025, Great River Energy and Lake Region Electric Cooperative (collectively, applicants) filed a route permit application to construct and operate the Otto Tap project, a 2.9 mile 115 kV transmission line and new substation in Otto and Pine Lake Townships in Otter Tail County, Minnesota (project).³

² Minnesota Statute §216I.07, subd. 4 (c) states the commission must conduct the public hearing under procedures established by the commission and may request that an administrative law judge from the [Court] of Administrative Hearings conduct the hearing and prepare a report.

³ Great River Energy and Lake Region Electric Cooperative, *Application for a Route Permit for the Otto Tap 115 kV Transmission Line Project in Otter Tail County, Minnesota*, June 30, 2025, eDockets Number [202511-224627-02](#) (herein after Route Permit Application or RPA). The filing also included a cover letter [202511-224627-01](#); and appendices [202511-224627-03](#), [202511-224627-04](#), [202511-224627-05](#), 202511-224627-06 (non-public), [202511-224627-07](#), [202511-224627-08](#), [202511-224627-09](#), [202511-224627-10](#), [202511-224627-11](#), [202511-224627-12](#), [202511-224627-13](#), and [202511-224627-14](#).

Project Purpose

The applicants state that the project is needed to ensure continued reliability for Lake Region Electric Cooperative customers in the area by providing a new 115 kV connection to the Otto Substation.⁴

Project Description

The applicants propose constructing a new 2.9-mile 115-kV single-circuit transmission line between Great River Energy's existing Perham to Rush Lake 115-kV transmission line and the new replacement Otto Substation (Figure 1, attached). They seek 100 feet of right-of-way within a route width of 200-feet in most places, with a wider route width of up to 750 feet around the substation and where the proposed route crosses U.S. Highway 10. The poles utilized for the project will be wood or steel, 70 to 90 feet tall, and placed 350 to 400 feet apart. The applicants anticipate construction to begin in the fall of 2027 with an in-service date of summer 2028.

Regulatory Process and Procedures

In Minnesota, no person may construct a high voltage transmission line without a route permit issued by the Commission.⁵ Because the proposed project is designed for and capable of operating at a nominal voltage of 115 kV and is 2.9 miles long, it meets the statutory definition of a high voltage transmission line under the Minnesota Energy Infrastructure Permitting Act and therefore requires a route permit from the Commission.⁶ Because the project is a high voltage transmission line with a capacity between 100 and 300 kV, the route permit application qualifies for Commission review under the Standard Review process described in Minnesota Statute §216I.07.

The project does not require a certificate of need from the Commission because the project is not a large energy facility as defined in Minn. Stat. §216B.2421, subd. 2.

Route Permit Application

Route permit applications for large electric power facilities must provide information about the project such as project ownership, a description of the project and associated facilities, environmental information, and maps.⁷ **Table 1** provides a comprehensive list of information required by statute. Review under the Minnesota Statute 216I Energy Infrastructure Permitting process does not require applicants to propose alternative routes in their permit application. However, if applicants have evaluated and rejected alternative routes, they must describe these rejected alternatives and the reasons for rejecting them in their application.⁸

The Commission must determine whether an application is complete and advise the applicant of any deficiencies within ten working days of the date the application is received.⁹ The Commission may accept an application as complete, reject an application, or accept an application as complete if

⁴ RPA, p. 7

⁵ Minnesota Statute 216I.05, subd. 2.

⁶ Minnesota Statute §216I.02, subd. 8

⁷ Minnesota Statute §216I.05, subd. 3

⁸ Minnesota Statute §216I.05, subd. 3 (14)

⁹ Minnesota Statute §216I.05, subd. 7

unincluded information is not essential to provide adequate notice and may be obtained from the applicant prior to the initial public meeting.¹⁰ The permitting process begins when the Commission determines that a permit application is complete; the Commission has six months (or nine months, with just cause) from the date of this determination to reach a permit decision.¹¹

The route permit application must contain an Environmental Assessment (EA) prepared by the applicant. An EA is a document which describes the potential human and environmental impacts of a proposed project and possible mitigation measures. An EA is the only state environmental review document that must be prepared for the proposed project under the standard review process.¹² Minnesota Statute Chapter 216I outlines the environmental information required in the EA.¹³

Public Information Meeting and Comment Period

Following a determination of whether the application is complete, the Commission must hold at least one public meeting near the proposed project location to explain the permitting process, present major issues, accept public comments on the need for and scope of an addendum to the EA and respond to questions raised by the public. In practice, the Commission holds a remote access meeting in addition to the public meeting near the proposed project. Written comments must be accepted for no less than 10 days after the date of the last public meeting and the Commission must accept comments on potential impacts, alternative routes to be considered, and permit conditions.¹⁴

Draft Permit and EA Addendum

Following the close of the public comment period, the Commission must prepare a draft route permit including proposed permit conditions. The draft permit does not authorize a person to construct the project.¹⁵

The Commission must also determine whether an addendum to the EA is required and, if an addendum is required, must identify the scope of the addendum.¹⁶ The Commission must prepare an addendum if the Commission identifies other routes or potential impacts for review following the public information meeting and associated comment period.¹⁷ The public may provide comments on the EA and any addendum to the EA at the public hearing and comment period required under Minnesota Statute 216I.07, subd 4.¹⁸

¹⁰ Ibid.

¹¹ Minnesota Statute §216I.07, subd. 5

¹² Minnesota Statute §216I.07, subd. 3

¹³ Minnesota Statute §216I.05, subd. 4

¹⁴ Minnesota Statute §216I.05, subd. 9

¹⁵ Minnesota Statute §216I.05, subd. 10(1)

¹⁶ Minnesota Statute §216I.05, subd. 10(2)

¹⁷ Minnesota Statute 216I.07, subd. 3 (b).

¹⁸ Minnesota Statute 216I.07, subd. 4.

Public Hearing

The Commission must hold a public hearing in the area where the project is proposed after a draft permit is issued, and any EA addendum if prepared.¹⁹ The hearing is typically presided over by an administrative law judge (ALJ) from the Court of Administrative Hearings. The Commission may request that the ALJ provide a full report with a summary of public testimony and comments, findings of fact, conclusions of law, and recommendations regarding the project.²⁰

Staff Review

Staff recommend the Commission find the application complete and recommends a full ALJ report for the project and the public hearing.

Application Completeness

On August 5, 2025, Great River Energy provided Commission staff with a draft of the route permit application for preapplication review as required in Minnesota Statute §216I.05, subd. 6. EIP staff responded to the applicant with recommendations focused on completeness and clarifications that may assist the Commission's review of the application on September 25, 2025. The applicants summarized their responses to EIP comments in Appendix E of the filed route permit application.

Staff have reviewed the application and believes that its comments on the draft application and supporting materials were generally addressed in the application filed on November 3, 2025. Staff recommend that applicants make a supplemental filing no later than December 2, 2025, that includes:

- Documentation of follow-up phone calls with the Tribal Historic Preservation Offices from the seven tribes that have not responded to previous e-mail and US mail contact.
- Documentation that applicants provided project and applicant contact information to four members of the “Agency Reps” service list in eDockets not indicated in Appendix C.
- Additional resources (e.g. local governments, MISO Queue, EQB Database) applicants reviewed when developing the section on cumulative potential effects.

Administrative Law Judge Report

Staff recommends that the Commission request a full ALJ report with findings, conclusions, and recommendations for the project’s public hearing. Staff believe that a full ALJ report with recommendations provides an unbiased, efficient, and transparent method to voice and resolve any issues that may emerge as the record is developed. Requiring a full ALJ report reduces the burden on staff and helps ensure that the Commission has a robust record on which to base its decision.

¹⁹ Minnesota Statute 216I.07, subd. 4.

²⁰ Minnesota Statute 216I.07, subd. 4 (c) states the commission must conduct the public hearing under procedures established by the commission and may request that an administrative law judge from the [Court] of Administrative Hearings conduct the hearing and prepare a report.

EIP Staff Recommendations

Staff recommend that:

- The Commission find the application sufficiently complete in accordance with Minnesota Statute §216I.05 to proceed with the public information meeting, but that the applicants make a supplemental filing no later than December 2, 2025, that includes:
 - Documentation of follow-up phone calls with the Tribal Historic Preservation Offices from the seven tribes that have not responded to previous e-mail and US mail contact.
 - Documentation that applicants provided project and applicant contact information to four members of the “Agency Reps” service list in eDockets not indicated in Appendix C.
 - Additional resources (e.g. local governments, MISO Queue, EQB Database) applicants reviewed when developing the section on cumulative potential effects.
- The Commission request a full ALJ report with findings, conclusions, and recommendations for the project’s public hearing.

Figure 1. Otto Tap Project – Overview Map



Table 1. Application Completeness Requirements

Topic	Statutory Requirement	Location in Document
Project ownership	216I.05, subd. 3(b)(1)	1.2
Meets staff expectations. The project will be jointly owned by Great River Energy and Lake Region Electric Cooperative. Respective ownerships of the project components are identified in Section 1.2 of the application.		
Permittee name	216I.05, subd. 3(b)(2)	1.3
Meets staff expectations. Great River Energy and Lake Region Electric Cooperative will both be permittees.		
Project description	216I.05, subd. 3(b)(3)	1.5, 3.1, 3.2
Meets staff expectations. Applicants incorporated EIP staff recommendations for clarifying the project description.		
Environmental information, generally	216I.05, subd. 3(b)(4) and subd. 4(a)	Section 6
Staff find the applicants incorporated staff recommendations to include environmental information for the proposed route as detailed in Minn. Stat. 216I.05, subd. 4(a). See resource-specific discussions.		
Identification of Property Owners	216I.05, subd. 3(b)(5), as described in 216I.05, subd. 8 (3)	Appendix F
Meets staff expectations; Appendix F provides a list of landowners.		
Maps	216I.05, subd. 3(b)(6)	Figures 1, 2, 3, 7, 10, and 11; Appendix B
Meets staff expectations. Applicants incorporated relevant maps into the body of the application. Staff believes that maps in the body of the application and in Appendix B are legible and provide useful illustrations of the proposed project and the alternative route considered.		
Existing ROWs	216I.05, subd. 3(b)(7)	3.1.2, 4.2, 5.1.3, Figure 5
Meets staff expectations. Applicants incorporated staff recommendations to provide additional details, including an illustration, regarding co-location with existing public rights-of-way.		

Topic	Statutory Requirement	Location in Document
Project design, including required ancillary facilities	216I.05, subd. 3(b)(8)	3.1, 3.2, 5.1, 5.2
Meets staff expectations. Applicants addressed staff's questions about the new Otto Substation and provided additional information, including illustrations, about project design.		
Project cost	216I.05, subd. 3(b)(9)	3.3
Meets staff expectations. Applicants included decommissioning costs for the existing Otto Substation in the cost estimate.		
Design for expansion	216I.05, subd. 3(b)(10)	3.1.12
Meets staff expectations.		
Site or ROW acquisition, construction, maintenance, & restoration	216I.05, subd. 3(b)(11)	5.1 and 5.2
Meets staff expectations. Applicants clarified information on land acquisition, construction, maintenance, and restoration in response to staff questions and comments.		
Other Permits	216I.05, subd. 3(b)(12)	2.4
Meets staff expectations. Applicants responded to staff questions about permitting requirements for access to the substation and tap location in Section 2.4 and 3.1.5 and Appendix E.		
Certificate of Need Requirement	216I.05, subd. 3(b)(13)	2.1
Meets staff expectations; a Certificate of Need is not required for the project.		
Other sites or routes considered	216I.05, subd. 3(b)(14)	4.0
Meets staff expectations. Applicants added additional information about the differences between the proposed route and a route alternative along 470 th Avenue that was considered but ultimately rejected.		
Additional information required by rule	216I.05, subd. 3(b)(15)	6.4.5.1
Meets staff expectations. Applicants provided information clarifying that the project avoids the prohibited routes identified in Minn. R. 7850.4300.		
Tribal coordination	216I.05, subd. 3(b)(16)	Appendix D and 1.8.2

Topic	Statutory Requirement	Location in Document
<p>Does not meet staff expectations. Prior to providing staff with a draft application, the applicants contacted Tribal government officials and Tribal Historic Preservation Officers (THPOs) from all 11 Minnesota Tribal governments.</p> <p>In its comments on the draft application, staff requested that applicants reach out again to the THPOs for the eight Minnesota tribes who did not respond with a follow up email and, if that is not successful, a phone call, and that applicants document its outreach and responses in the filed application. The recommendation is consistent with the Commission’s July 2025 Guidance for Successful Tribal Engagement (Tribal guidance).</p> <p>The Applicants followed up with all eight THPOs that did not respond to initial emails by sending follow up emails and received a response from one additional THPO. Applicants did not provide documentation of follow-up calls to the seven THPOs that did not respond. Consistent with staff recommendations on the draft application, staff request the Applicants place phone calls to the seven THPOs directly that have not responded to initial and follow up emails and document these attempts in a supplemental filing no later than December 2, 2025.</p>		
Preapplication Coordination (LGUs)	216I.05, subd. 5 (1)	Appendix C
<p>Meets staff expectations. Local Governmental Units were properly notified on May 12, 2025, via email as documented in Appendix C.</p>		
Preapplication Coordination (State Technical Resource Agencies)	216I.05, subd. 5 (3)	Appendix C and 1.8.2
<p>Does not meet staff expectations. Prior to providing staff with a draft application, the applicants contacted state and federal agencies. In its comments on the draft application, staff requested that applicants ensure that notice was provided to the “Agency Reps” service list in eDockets. Based on the information provided in Appendix C, it appears the applicants provided additional follow-up with many, but not all, agency contacts on the “Agency Reps” service list.</p> <p>Staff recommends use of the “Agency Reps” contact list to ensure consistency for both applicants and agencies across projects. As noted in staff comments on the draft permit, each State Technical Resource Agency identified in this service list will determine its preapplication coordination procedures.</p> <p>Staff request the applicants provide documentation in a supplemental filing no later than December 2, 2025, that project and applicant contact information is provided to the following members of the “Agency Reps” service list in eDockets:</p> <ul style="list-style-type: none"> • chad.konickson@usace.army.mil (US Army Corps of Engineers); • isaac.weston@state.mn.us (Minnesota Indian Affairs Council); • twincities@fws.gov (US Fish and Wildlife Service); and • dean.hunter@state.mn.us (Minnesota Department of Labor and Industry). 		
Environmental setting	216I.05, subd. 4(a)(1)	6.3

Topic	Statutory Requirement	Location in Document
Meets staff expectations. Applicants made minor modifications to this section to improve clarity.		
Human settlement, generally	216I.05, subd. 4(2)	6.4
See resource-specific discussions.		
Aesthetics	216I.05, subd. 4(a)(2)	6.4.1
Meets staff expectations. Applicants have modified this section from the proposed draft to clarify potential impacts and mitigation measures.		
Cultural Values	216I.05, bud. 4(a) (2)	6.4.2
Meets staff expectations. Applicants have made minor modifications to this section to clarify potential impacts and mitigation measures.		
Displacement	216I.05, subd. 4(a)(2)	6.4.3
Meets staff expectations. The project will not require displacement of any homes or businesses. Applicants made minor modifications to this section to improve clarity.		
Environmental Justice Impacts	216I.05, subd. 4(a)(2); 216I.05, subd. 11(a)(3)	6.4.4
Meets staff expectations. The project is not located in an a statutorily defined environmental justice area.		
Land Use and Zoning	216I.05, subd. 11(a) (2)	6.4.5
Meets staff expectations. Applicants have modified this section from the proposed draft to discuss mitigation measures that minimize land use impacts and conflicts.		
Noise	216I.05, subd. 4(a)(2)	6.4.6
Meets staff expectations. Applicants have modified this section from the proposed draft to clarify potential impacts, mitigation measures, and resources used to develop this information.		
Public Services and Transportation	216I..05, subd. 4(a)(2)	6.4.7
Meets staff expectations. Applicants have modified this section from the proposed draft to clarify potential impacts and mitigation measures.		
Recreation	216I..05, subd. 4(a)(2)	6.4.8

Topic	Statutory Requirement	Location in Document
Meets staff expectations. Applicants have modified this section from the proposed draft to clarify potential impacts and mitigation measures.		
Socioeconomic Impacts	216I.05, subd. 4(a)(2); 216I.05, subd. 11(b)(14)	6.4.9
Meets staff expectations. Applicants have modified this section from the proposed draft to clarify potential impacts and mitigation measures.		
Property Values	216I.05, subd. 4(a)(2); 216I.05, subd. 11(b)(14)	6.4.10
Meets staff expectations. While impacts to the value of individual properties are influenced by a complex interaction of factors and cannot be predicted, applicants have added information summarizing studies on potential impacts to property values from transmission lines and provided a discussion of mitigation measures.		
Public health & safety including EMF	216I.05, subd. 11(b)(1) (Decision Criteria)	6.5 and 3.1.7
Meets staff expectations. Applicants have modified this section from the proposed draft to clarify potential impacts and mitigation measures.		
Land-based economics, generally	216I.05, subd. 4(a)(3)	6.6
See resource-specific discussions.		
Agriculture	216I.05, subd. 4(3); 216I.05, subd. 11(b)(5) and (9); see also Minn. R. 7850.4400, subp. 4.	6.6.1
Meets staff expectations. Applicants have modified this section from the proposed draft to clarify potential impacts and mitigation measures.		
Forestry	216I.05, subd. 4(3)	6.6.2
Meets staff expectations. The project will not impact commercial forestry. Applicants made minor modifications to this section to improve clarity.		
Mining	216I.05, subd. 4(a)(3)	6.6.3
Meets staff expectations. The project will not impact mining operations.		
Tourism	216I.05, subd. 4(a)(3)	6.6.4

Topic	Statutory Requirement	Location in Document
Meets staff expectations. The project is not expected to impact tourism resources.		
Archaeological & historic resources	216I.05, subd. 4(4)	6.7
Meets staff expectations. Applicants have modified this section from the proposed draft to clarify potential impacts and mitigation measures.		
Natural environment impacts - generally	216I.05, subd. 4(5)	6.8
See resource-specific discussions.		
Air quality	216I.05, subd. 4(a)(5)	6.8.1
Meets staff expectations. Applicants have modified this section from the proposed draft to clarify potential impacts and mitigation measures.		
Geology and Groundwater	216I.05, subd. 4(a)(5); 216I.05, subd. 11(b)(1)	6.8.4, 6.8.8
Meets staff expectations. The project is not anticipated to impact subsurface geology or topography. Mitigation measures required by the Commission's sample permit are discussed.		
Soils	216I.05, subd. 11(b)(1) and subd. 11(b)(5)	6.8.6
Meets staff expectations. Applicants have modified this section from the proposed draft to clarify potential impacts and mitigation measures.		
Surface waters (including stormwater, floodplains, and wetlands)	216I.05, subd. 4(5); 216I.05, subd. 11(b)(1)	6.8.8
Meets staff expectations. Applicants have modified this section from the proposed draft to clarify potential impacts and mitigation measures.		
Vegetation	216I.05, subd. 4(5)	6.8.7
Meets staff expectations. Applicants have modified this section from the proposed draft to clarify potential impacts and mitigation measures.		
Wildlife	216I.05, subd. 4(5)	6.8.9
Meets staff expectations. Applicants have modified this section from the proposed draft to clarify potential impacts and mitigation measures.		
Rare and unique resources	subd. 4(8)	6.8.5

Topic	Statutory Requirement	Location in Document
Meets staff expectations. Applicants have modified this section from the proposed draft to clarify potential impacts and mitigation measures.		
Greenhouse gases	216I.05, subd. 4(6)	6.8.3 and Appendix H
Meets staff expectations. Applicants have modified this section from the proposed draft to clarify potential impacts and mitigation measures.		
Climate change resilience	216I.05, subd. 4(7)	6.8.2
Meets staff expectations. Information was added for the applicants' ongoing transmission resilience improvement projects.		
Unavoidable Impacts	216I.05, subd. 4(9)	6.9
Meets staff expectations.		
Irretrievable and Irreversible Impacts	216I.05, subd. 11(b)(11)	6.10
Meets staff expectations.		
Cumulative Potential Effects	216I.05, subd. 11(a)(2) and (b)(2)	6.11
Does not fully meet staff expectations. Applicants did add a discussion about cumulative potential effects, but the text only refers to upcoming Minnesota Department of Transportation (MnDOT) and Otter Tail County projects.		
Staff request the applicants make a supplemental filing no later than December 2, 2025, clarifying additional resources (e.g. local governments, MISO Queue, EQB Database) they reviewed when developing this section.		
Mitigation Measures	216I.05, subd. 4(10)	Section 6
See resource-specific discussions. Mitigation measures were added throughout the various resource sections.		