



**BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**  
**ENERGY ENVIRONMENTAL REVIEW AND ANALYSIS**  
**COMMENTS AND RECOMMENDATIONS**

**LAKETOWN 115 kV TRANSMISSION LINE PROJECT**  
**DOCKET No. E015, ET2/TL-24-132**

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**Date:** December 12, 2024

**EERA Staff:** Logan Hicks | 651.539.2712 | [logan.m.hicks@state.mn.us](mailto:logan.m.hicks@state.mn.us)

**In the Matter of Great River Energy's Application for a Route Permit for a 115 kV Transmission Line and Associated Facilities Project in Carver County, Minnesota.**

**Issues Addressed:** These comments and recommendations address the environmental assessment (EA) scoping process, the routing alternatives proposed during the scoping process, and those alternatives which Department of Commerce (Department), Energy Environmental Review and Analysis staff (EERA) recommends for inclusion in the EA scope.

**Documents Attached:**

(1) Routing Alternatives Map

Additional documents and information can be found on eDockets:

<https://www.edockets.state.mn.us/documents> (Docket # 24-132) and on the Department's website: <https://apps.commerce.state.mn.us/web/project/15657>

This document can be made available in alternative formats (i.e., large print or audio) by calling 651-296-0391 (voice).

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## **Introduction and Background**

On August 19, 2024, Great River Energy (GRE) and Minnesota Valley Electric Cooperative (MVEC) (applicants) filed a route permit application to construct and operate approximately 4.3 miles of new 115 kilovolt (kV) transmission line. The project would connect a new substation in Laketown Township, Minnesota, to an existing 115 kV transmission line in Dahlgren Township, Minnesota.<sup>1</sup>

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<sup>1</sup> Route Permit Application for the Laketown 115 kV Transmission Line Project, Great River Energy, August 19, 2024, eDockets Numbers – Filing Letter [20248-209604-01](#); Application [20248-209604-02](#); Figures [20248-209604-03](#), [20248-209604-04](#), [20248-209604-05](#); Appendix A [20248-209604-06](#), [20248-209604-07](#); Appendix B [20248-209604-08](#), [20248-209604-09](#); Appendix C [20248-209604-10](#); Appendix D [20248-209605-01](#); Appendix E [20248-209605-02](#), [20248-209605-03](#); Appendix F [20248-209606-01](#); Appendix G [20248-209606-02](#); Appendix H [20248-209606-03](#) [hereinafter Application].

On October 1, 2024, the Minnesota Public Utilities Commission (Commission) accepted the application as complete.<sup>2</sup>

The subsequent comments detail the scoping process and route alternatives proposed during scoping. Following the Commission's review of these alternatives, and based on any Commission input, the Department will finalize and issue the environmental assessment scoping decision for the project.

## Proposed Project

The applicants propose to construct approximately 4.3 miles of new, GRE-owned, double-circuit 115 kV HVTL connecting an existing GRE 115 kV transmission line to a new MVEC-owned substation in Laketown Township, Carver County.<sup>3</sup> The new line is proposed to be located within existing road right-of-way (ROW) for approximately half of its length and to follow, in part, existing distribution lines owned by MVEC.<sup>4</sup>

## Project Purpose

The applicants indicate that the proposed project will provide electric service to end users within Carver, Sibley, Scott, Rice and LeSueur counties.<sup>5</sup> The applicants note that the project will provide reliable electric service to current and future end-use customers in this rapidly growing region and will ensure sufficient electrical capability for increased electric demand in the future.<sup>6</sup>

The project is anticipated to be in service by summer 2028.

## Regulatory Process and Procedures

The proposed project requires a route permit. Accordingly, EERA staff is preparing an environmental assessment (EA) that will inform Commission decisions on the applicants' permit application. The first step in preparing the EA is scoping. The purpose of scoping is to provide citizens, local governments, tribal governments, and agencies an opportunity to focus the EA on those issues and alternatives that are relevant to the proposed project.<sup>7</sup>

## Scoping Process Summary

Commission and EERA staff held two public information and EA scoping meetings. One of the meetings was virtual, and one meeting was held in person. The virtual meeting was held on October 23, 2024, and had three attendees. The in-person meeting was held on October 28, 2024, and had eight attendees. Comments were received from four persons at the in-person meeting, who expressed concern on a variety of potential impacts associated with the project, including impacts to property value and land use, changes in the local aesthetic, and loss of habitat and wildlife.<sup>8</sup>

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<sup>2</sup> Commission Order Accepting Applications as Complete, October 1, 2023, eDockets numbers 202410-210617-01 .

<sup>3</sup> Application, Section 1.5.

<sup>4</sup> Application, Section 3.1.1.

<sup>5</sup> Application, Section 1.5.

<sup>6</sup> Id.

<sup>7</sup> Minnesota Rules, part 7850.3700, subpart 2.

<sup>8</sup> Oral Comments on the Scope of Environmental Assessment, eDocket number 202411-212355-01.

A comment period, which closed on November 12, 2024, provided the public an opportunity to submit comments to EERA staff on potential impacts and mitigation measures for consideration during the EA scope development process. Comments were received from one state agency,<sup>9</sup> one Tribal government, two local governments, and four citizens.<sup>10</sup> Three of these comments proposed specific routing alternatives for consideration in the EA.

After close of the comment period, EERA staff conferred with the applicant on proposed routing alternatives for study in the EA. On December 4, 2024, the applicant filed responses to public comments received during the scoping process.<sup>11</sup>

## EERA Staff Analysis and Comments

When reviewing routing alternatives proposed during the scoping process, the Department is charged with including in the EA scope those alternatives which will “assist in the [Commission’s] decision on the [route] permit application.”<sup>12</sup> EERA staff initially analyzes proposed routing alternatives using five criteria:

1. Was the alternative submitted in a timely manner, i.e., prior to the end of the public comment period for scoping?
2. Does the alternative contain an explanation of why the route should be included in the EA?<sup>13</sup> EERA staff interprets this criterion to require that route alternatives, to be included in the scope of the EA, must mitigate a potential impact of the proposed project, and this mitigation must be, in general terms, explained by the proposer of the alternative.
3. Is the alternative outside of areas prohibited in Minnesota Rule 7850.4300 (e.g., state and national parks)?
4. Does the alternative meet the applicants’ stated need for the project?
5. Is the alternative feasible? Can the alternative be constructed and is it permissible by state and federal agencies with authority for construction or operation of the project?

After utilizing these criteria, EERA staff then analyzes the remaining alternatives to determine if including them in the EA would aid in the Commission’s decision on the route permit application. EERA staff compares each proposed alternative to other alternatives, if any, that could also avoid or mitigate the impact(s) described by the proposer. If the proposed alternative impacts relatively more human and environmental resources, it is likely that the proposed alternative would not aid in the Commission’s decision on the route permit application.

EERA staff applied the criteria listed above to analyze routing alternatives proposed during the

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<sup>9</sup> Minnesota Department of Natural Resources, eDocket numbers [202411-211858-01](#) and [202411-211858-02](#)

<sup>10</sup> Written Comments on the Scope of Environmental Assessment, eDocket number [202411-212355-02](#).

<sup>11</sup> Applicants’ Response Comments on EA Scope, eDocket number [202412-212706-01](#).

<sup>12</sup> Minnesota Rule 7850.3700, Subpart 2, Item B.

<sup>13</sup> Minnesota Rule 7850.3700, Subpart 7.

scoping process. All proposed alternatives are indicated on the attached maps (see Attachment 1) and discussed here. During the public scoping process, three routing alternatives were identified for the project. In addition to the three routing alternatives identified by the public, EERA determined one additional routing alternative for the project.

All the proposed routing alternatives were timely received (with exceptions noted), provided adequate explanation of the mitigated impact(s), are outside the areas prohibited in Minnesota Rule 7850.4300, meet the stated need for the project, and are feasible.

As discussed further here, EERA staff recommends the following routing alternatives for inclusion in the EA scope:

- Route Alternative A (CSAH 10).
- Route Alternative B.
- Route Alternative C (230 kV transmission line).
- Alignment Alternative D.

The proposed routing alternatives are summarized and presented in Table 1, with a visual overview provided in the Attachment 1 Map.

**Table 1. Routing Alternatives Recommend for Inclusion in the Scope of the EA**

Routing Alternatives	Source
Route Alternative A (CSAH 10)	Public
Route Alternative B	Public
Route Alternative C (230 kV Line)	EERA
Alignment Alternative D	Public

## Alternatives Recommended for Inclusion in the Scope of the EA

### Route Alternative A (CSAH 10)

Route alternative A generally follows County State Aid Highway 10 (CSAH 10) (Attachment 1). The applicants initially considered this route alternative and rejected it.<sup>14</sup> The applicants state that they have corresponded with Carver County and avoided this route to mitigate interference with plans to widen CSAH 10 in the next 5 to 10 years. Carver County submitted a written comment supporting the applicants' proposed route for the same reasons.

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<sup>14</sup> Application, Section 4.3.

In a public comment, the CSAH 10 route was suggested as a better alternative than the applicants' proposed route, due to the use of existing infrastructure and the mitigation of impacts to private land.<sup>15</sup> Data in the route permit application indicates that the CSAH 10 route alternative would improve the percentage of collocation with existing infrastructure, relative to the proposed route, by 42 percent.<sup>16</sup> In their response to public comments, the applicants reiterated that they do not believe route alternative A (CSAH 10) is the best route for the project. They also stated that if EERA added this route alternative to the scope of the environmental assessment, then EERA should include a robust analysis of potential conflicts with Carver County's plans for CSAH 10.<sup>17</sup>

Based on record to date and the potential to mitigate impacts to private land, EERA recommends this route alternative be carried forward for further study in the EA.

## Route Alternative B

Route alternative B would follow the applicants' proposed route from the new Laketown substation south down Jersey Avenue, but instead of going east along Augusta Road, it would extend west and then south along Kelly Avenue, and tie into an Xcel Energy line along County Road 140 (Attachment 1). This route alternative would allow for collocation with roads for the entirety of the line and shorten the overall length of the line as well.

The applicants initially considered connecting with the Xcel Energy line but did not consider it further due to reliability issues.<sup>18</sup> The applicants' response to public comments reiterated this explanation and expressed that they do not support the study of this alternative in the EA.<sup>19</sup>

Based on the record to date, EERA recommends this route alternative be carried forward for further study in the EA.

## Route Alternative C (230 kV Line)

Route alternative C generally follow an existing Xcel Energy 230 kV transmission line (Attachment 1). The applicants considered this alternative but rejected it primarily due to correspondence with the City of Victoria, which stated that the land on the eastern portion of the transmission line will eventually become part of the City of Victoria. The land in question is planned to become zoned for commercial and industrial use.<sup>20</sup>

This route alternative is recommended by EERA, as it would be collated with an existing transmission line for 97 percent of its length.<sup>21</sup> Given the state's interest in utilizing existing infrastructure ROW for new transmission lines (see, Minnesota Statute 216E.03 subd. 7(15)(e) and the Minnesota Rule

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<sup>15</sup> Written Comments on the Scope of Environmental Assessment, General Public Section, eDocket number [202411-212355-02](#).

<sup>16</sup> Application, Section 4.3.

<sup>17</sup> Applicants' Response Comments on EA Scope, eDocket number [202412-212706-01](#).

<sup>18</sup> Application, Section 4.2.

<sup>19</sup> Applicants' Response Comments on EA Scope, eDocket number [202412-212706-01](#).

<sup>20</sup> Application, Section 4.3.

<sup>21</sup> Id.

7850.4100), EERA staff believes this route alternative should be carried forward for further study in the EA.<sup>22</sup>

## Alignment Alternative D

Alignment alternative D was suggested to mitigate construction impacts along Augusta Road, which a commenter stated was recently repaved and mostly paid for by the residents of Augusta Road.<sup>23</sup> The alignment alternative would not proceed along Augusta Road, but further south into private land before turning eastward and rejoining the applicants' proposed route (Attachment 1).

The applicants indicated that they do not have any objections to this alignment alternative, but they did note that this is greenfield route that may impact wetlands.<sup>24</sup>

EERA recommends this alignment alternative be carried forward for further study in the EA.

## EERA Staff Recommendations

EERA staff recommends that the applicants' proposed route and the routing alternatives noted in Table 1 (above) be included in the EA scoping decision.

To EERA staff's understanding, if the Commission concurs or takes no action, the Department will proceed to finalize and issue an EA scoping decision as described herein. If the Commission takes an action other than concurring and modifies the Department's recommendations, the Department will incorporate the Commission's input and will finalize and issue an EA scoping decision that reflects this input.

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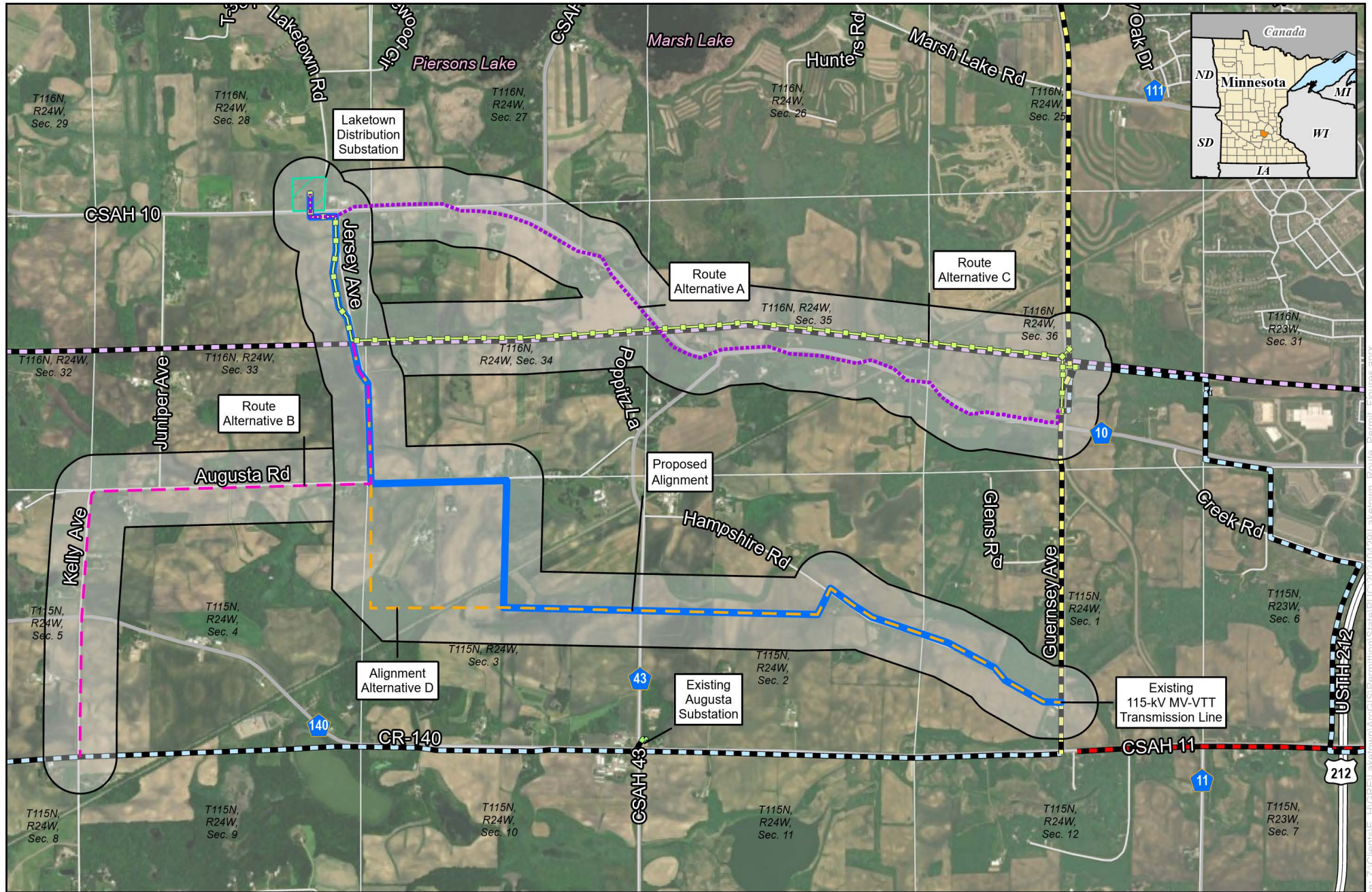
<sup>22</sup> Minnesota Statue 216E.03, Subd. 7 ("The commission must make specific findings that it has considered locating a route for a high-voltage transmission line on an existing high-voltage transmission route and the use of parallel existing highway right-of-way and, to the extent those are not used for the route, the commission must state the reasons").

<sup>23</sup> Written Comments on the Scope of Environmental Assessment, General Public Section, eDocket number [202411-212355-02](#).

<sup>24</sup> Applicants' Response Comments on EA Scope, eDocket number [202412-212706-01](#).



# Attachment 1. Routing Alternatives Map



0 1,250 2,500  
Feet  
1 inch = 2,500 feet



## Laketown 115-kV Transmission Line Project Route Alternatives Overview Carver County, Minnesota

- |                            |                                 |                          |
|----------------------------|---------------------------------|--------------------------|
| Great River Energy         | MV-AUT 115-kV Transmission Line | Non-GRE Transmission     |
| Proposed Alignment         | MV-VTT 115-kV Transmission Line | 69-kV Transmission Line  |
| Route Alternative A        |                                 | 115-kV Transmission Line |
| Route Alternative B        |                                 | 230-kV Transmission Line |
| Route Alternative C        |                                 | Section Boundary         |
| Alignment Alternative D    |                                 |                          |
| Substation Parcel Boundary |                                 |                          |
| Route Width                |                                 |                          |