



12300 Elm Creek Boulevard
Maple Grove, Minnesota 55369-4718
763-445-5000
greatriverenergy.com

August 26, 2022

Mr. Will Seuffert
Executive Secretary Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: Route Permit Condition 6.6 – Showy Lady’s Slippers
Great River Energy & Otter Tail Power’s Frazee to Erie 115-kV Transmission Project in Becker and
Otter Tail counties
Docket No. ET2/TL-20-423

Dear Mr. Seuffert:

On December 17, 2021, the Minnesota Public Utilities Commission (“Commission”) granted Great River Energy and Otter Tail Power (“Permittees”) a Route Permit (“Route Permit”) for their Frazee to Erie 115-kV Transmission Project (“Project”) in Becker and Otter Tail counties, Minnesota. Section 6.6 of the Route Permit requires the Permittees to coordinate with landowners regarding the showy lady’s slipper, including to avoid or transplant such plants if they are identified in the Project right-of-way:

Permittees must coordinate with landowners regarding the identification of any showy lady’s slipper. To the extent showy lady’s slipper is identified, Permittees will coordinate with landowners to avoid or transplant plants. At least 14 days prior to submitting the plan and profile, the Permittees must file with the Commission documentation of landowner coordination that includes the location of identified showy lady’s slipper and negotiated avoidance measures.

On May 9, 2022, Great River Energy sent a letter to all landowners requesting that they contact Mark Strohfus at Great River Energy if they had any Lady’s Slipper plants on their property. During the week of July 18, 2022, Peter Schaub, Great River Energy land rights senior field representative, met with Mr. Charles Rohloff to discuss an easement for the Project. Mr. Rohloff indicated that there were Showy Lady’s Slippers on his and his neighbor’s (Mr. Kenneth Hoehne) properties, and Mr. Rohloff expressed concern that clearing the right-of-way would eliminate the shade needed for the plants to thrive.

During subsequent coordination with Great River Energy, Mr. Rohloff identified a well-defined plan to transplant the Showy Lady’s Slipper to other locations around the City of Frazee, which would allow others in the community to also appreciate the plants. Mr. Rohloff indicated he was working with a Minnesota Department of Natural Resources (DNR) ecologist and the local high school agricultural studies teacher/Future Farmers of America chapter leader, to involve local students in soil testing and transplanting.

Mr. Will Seuffert
Executive Secretary Minnesota Public Utilities Commission
Page 2

On August 10, 2022, Great River Energy met with Mr. Rohloff and the DNR ecologist to mark the location of the plants and to review potential transplant sites. Approximately 75 plants were located on the two properties. DNR explained that it is important when transplanting to be sure to take a large cut of native soils with the plants because a soil enzyme was necessary for the plants to survive. DNR suggested using a small excavator or Bob Cat to dig out and transplant the plants. DNR also indicated that the work should be done in the third or fourth week in September.

Given the large number of plants and the limited, viable public properties on which to transplant, the landowners agreed that some plants may need to be transplanted just outside of Great River Energy's right-of-way. To implement DNR's recommendation to use a small excavator or similar equipment to ensure that native soils will be included in the transplant, it is necessary to clear the right-of-way (see enclosed figure) in this area in mid-September. Great River Energy has conferred with the landowner and DNR and understands that all parties agree with this proposed plan.

Accordingly, after consultation with Commerce and Commission staff, Great River Energy requests confirmation from the Commission that the work associated with transplanting the Showy Lady's Slipper is authorized under the Route Permit. This request results in nominal impacts and is undertaken in a good faith effort to comply with Section 6.6 of the Route Permit. Any vegetation clearing will be limited to the right-of-way, as shown on the enclosed map. Great River Energy will coordinate with the Department of Commerce, Energy Environmental Review and Analysis, concerning this work, and will submit an update in this docket once the work is completed. Separately, Great River Energy currently anticipates that it will commence construction of its portion of the Project in the first half of 2023 and will submit the required compliance filings, consistent with that timeframe.

If you have any questions about these Lady's Slipper activities, please contact me at 763-445-5210 or mstrohfus@greenergy.com.

Sincerely,

GREAT RIVER ENERGY



Mark Strohfus
Project Manager, Transmission Permitting

Enclosure



Purple shading indicates the approximate area where trees may be cleared to facilitate the transplanting of Lady's Slipper plants. The area will be surveyed and staked prior to tree clearing.

PROPOSED TREE CLEARING