

August 11, 2023

VIA ELECTRONIC FILING

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

Re: 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, MN
MPUC Docket No. ET2/TL-22-235

Dear Mr. Seuffert:

Great River Energy has reviewed the Findings of Fact, Conclusions of Law, and Recommendations (“Report”) filed by the Administrative Law Judge on August 4, 2023, in the above-captioned matter. Great River Energy appreciates the Administrative Law Judge’s thorough Report and the recommendation that a route permit be issued for the Project. Great River Energy does not have any exceptions to the Report.

Previously, Great River Energy and the Department of Commerce, Energy Environmental Review and Analysis (“DOC-EERA”) disagreed regarding whether Condition 6.3 of the Route Permit (regarding a vegetation management plan) should explicitly acknowledge that landowner preferences would be part of the vegetation management plan. Great River Energy believed that Condition 6.3 should specifically recognize that landowner preferences would be included in the vegetation management plan.¹ In response, DOC-EERA stated: “EERA believes that building landowner goals and associated objectives into the VMP allows GRE to meet their goal of accommodating landowner requests for site restoration along the transmission route while preserving the technical function of the vegetation management plan.”² In the Report, the Administrative Law Judge recommended that the Minnesota Public Utilities Commission (“Commission”) approve Condition 6.3, as written by DOC-EERA, stating: “The Administrative Law Judge agrees with EERA that landowner preference is appropriate as a vegetation

¹ Supplemental Direct Testimony of Mark Strohfus, at 5-6 (May 5, 2023); Great River Energy Comments, at 2-3 (June 6, 2023).

² DOC-EERA Comments, at 2 (June 16, 2023).

management plan goal and recommends not including recognition of landowner preferences in the route permit.”³

For the reasons previously explained in this record, Great River Energy continues to believe that it is important that any vegetation management plan acknowledge and accommodate landowner preferences.⁴ Because DOC-EERA’s comments and the Report reflect agreement on this point, Great River Energy believes that the record in this matter is clear that landowner preferences may be included in the Project’s vegetation management plan and, accordingly, does not submit exceptions to the Report.

Sincerely,

FREDRIKSON & BYRON, P.A.

s/ Haley Waller Pitts

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³ Report, at ¶ 190.

⁴ Supplemental Direct Testimony of Mark Strohfus, at 5-6 (May 5, 2023); Great River Energy Comments, at 2-3 (June 6, 2023).

CERTIFICATE OF SERVICE

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, MN

MPUC Docket No. ET2/TL-22-235

Breann Jurek certifies that on the 11th day of August 2023, she e-filed on behalf of Great River Energy true and correct copies of the following documents:

1. Great River Energy's Correspondence concerning Administrative Law Judge's Findings of Fact, Conclusions of Law, and Recommendations; and
2. Certificate of Service.

A copy has also been served on the individuals listed on the attached service list.

Executed on: August 11, 2023

Signed: /s/ Breann L. Jurek

Fredrikson & Byron, P.A.
60 South Sixth Street
Suite 1500
Minneapolis, MN 55401

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_22-235_Official CC Service List
Richard	Dornfeld	Richard.Dornfeld@ag.state.mn.us	Office of the Attorney General-DOC	Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul, Minnesota 55101	Electronic Service	No	OFF_SL_22-235_Official CC Service List
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_22-235_Official CC Service List
Breann	Jurek	bjurek@fredlaw.com	Fredrikson & Byron PA	60 S Sixth St Ste 1500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-235_Official CC Service List
Jamie	MacAlister	jamie.macalister@state.mn.us	Department of Commerce	85 7th Place East, Ste. 500 St. Paul, MN 55101	Electronic Service	No	OFF_SL_22-235_Official CC Service List
Jenna	Ness	jenna.ness@state.mn.us	Department of Commerce	85 7th place east St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_22-235_Official CC Service List
Cezar	Panait	Cezar.Panait@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 55101	Electronic Service	No	OFF_SL_22-235_Official CC Service List
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_22-235_Official CC Service List
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_22-235_Official CC Service List
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_22-235_Official CC Service List

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Mark	Strohfus	mstrohfus@grenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_22-235_Official CC Service List
Suzanne	Todnem	suzanne.todnem@state.mn.us	Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul, Minnesota 55164	Electronic Service	Yes	OFF_SL_22-235_Official CC Service List
Haley	Waller Pitts	hwallerpitts@fredlaw.com	Fredrikson & Byron, P.A.	60 S Sixth St Ste 1500 Minneapolis, MN 55402-4400	Electronic Service	No	OFF_SL_22-235_Official CC Service List