

March 10, 2025

VIA eFILING

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

The Honorable Jim Mortenson
Office of Administrative Hearings
600 North Robert Street
P.O. Box 64620
Saint Paul, MN 55164-0620

Re: Response to Public Comments

**In the Matter of the Application of Dairyland Power Cooperative for a Route Permit to Relocate an Existing 161 kV Transmission Line in Wabasha County, Minnesota.
MPUC Docket No. ET3/TL-23-388
OAH Docket No. 5-2500-40184**

Dear Mr. Seuffert and Judge Mortenson:

Dairyland Power Cooperative (Dairyland or Applicant) submits these comments in response to the written and oral public comments made through March 3, 2025, on Dairyland's Application for a Route Permit (Application) to relocate approximately 13.3 miles of 161-kilovolt (kV) high voltage transmission line (HVTL) and construct a new substation in Wabasha County, Minnesota (Project).

Dairyland's prefiled written testimony responded to prior written comments submitted by the following agencies: the Minnesota State Historic Preservation Office (SHPO), Minnesota Department of Natural Resources (MDNR), and the Minnesota Department of Transportation (MnDOT). Public hearings were held on February 11 and 12, 2025, and approximately 27 members of the public provided oral comments at these hearings. In addition, approximately 15 written comments were received by the March 3, 2025, comment deadline. MDNR provided additional written comments on March 4, 2025. Dairyland appreciates the agency and public participation in this docket and the opportunity to offer this response to significant issues raised by commenters.

I. Response to Public Comments.

a. Comments on Route Segment Alternatives and Alignments.

Numerous public comments expressed a preference for one or more of the route alternatives, with many commenters seeking to minimize impacts to dairy farms, agricultural operations, and nearby

homes and businesses.¹ Based on further review of the Environmental Assessment (EA), public comments, and record as a whole, Dairyland reevaluated the routing recommendations included in Mr. Sage Williams' Direct Testimony and offers the following additional discussion of the route alternatives.

While Dairyland continues to find that the Applicant's Proposed Route² meets all routing criteria, as to the Group 1 alternatives,³ Dairyland recommends the Minnesota Public Utilities Commission (Commission) issue a route permit that includes RSA-AAA-2, As Modified. Many landowners in the area expressed a preference for RSA-AAA-2 because it increases the distance between the line and farmsteads and places poles along property lines, minimizing impacts to agricultural operations.⁴ Dairyland's proposed RSA-AAA-2, As Modified, further improves RSA-AAA-2, by minimizing impacts to agricultural operations by reducing the number of structures needing to be placed in open fields. Given the public comments supporting construction of the line in this area, Dairyland believes the landowner support for this alternative weighs in favor of adopting the change, despite the longer length and departure from the public right-of-way (ROW).

As to the Group 2 alternatives,⁵ landowners in the area stressed the importance of minimizing potential impacts to dairy farms to the extent practical.⁶ While there is not a consensus among

¹ See Comment by Marilyn Wallace (Feb. 18, 2025) (eDocket No. 20252-215450-01); Comment by Eric Bartsh (Feb. 24, 2025) (eDocket No. 20252-215706-01); Comment by Cindy Stamschror (Feb. 24, 2025) (eDocket No. 20252-215704-01); Comment by Linda Stamschror (Feb. 24, 2025) (eDocket No. 20252-215703-01); Comment by Toni McMillin (Feb. 24, 2025) (eDocket No. 20252-215700-01); Comment by Angie and Marty Murphy (Feb. 24, 2025) (eDocket No. 20252-215698-01); Comment by Belinda Gilsdorf (March 3, 2025) (eDocket No. 20253-215963-01); Comment by Bill Gilsdorf (March 3, 2025) (eDocket No. 20253-215963-01); Comment by Gerry Gilsdorf (March 3, 2025) (eDocket No. 20253-215963-01); Comment by Linda Stamschror (March 3, 2025) (eDocket No. 20253-215963-01); Comment by Tim Gilsdorf (March 3, 2025) (eDocket No. 20253-215963-01); and Comment by Tom Gilsdorf (March 3, 2025) (eDocket No. 20253-215963-01).

² Dairyland used the term "Proposed Alignment" in the Application to refer to the location of the transmission line and structures. The term "Applicant's Proposed Route," as used by EERA in the EA, has the same meaning as "Proposed Alignment." Dairyland uses EERA's terminology here to avoid confusion.

³ Based on the geographic proximity of the seven Route Segment Alternatives (RSA) and six alignment alternatives (AA) identified in the EA Scoping Decision, Dairyland compared the corresponding segment of the Applicant's Proposed Route, as described in the Application, to these alternatives in three groups, based on where the RSAs and AAs generally share common start and end points: Group 1 (RSA-AAA-1 and RSA-AAA-2); Group 2 (RSA-B, RSA-C, RSA-D, RSA-EAA-1, RSA-EAA-2, and RSA-F); and Group 3 (RSA-GAA-1 and RSA-GAA-2). See Direct Testimony of Sage Williams – Schedule B (Jan. 28, 2025) (eDocket No. 20251-214482-02); see also EA – Appendix B, Maps 1-8 (Jan. 31, 2025) (eDocket No. 20251-214724-01).

⁴ See Comment by Eric Bartsh (Feb. 24, 2025) (eDocket No. 20252-215706-01) and Comment by Gene Zarling (Feb. 24, 2025) (eDocket No. 20252-215701-01);

⁵ See Direct Testimony of Sage Williams – Schedule B (Jan. 28, 2025) (eDocket No. 20251-214482-02) (Williams Direct); see also EA – Appendix B, Maps 3-5 (Jan. 31, 2025) (eDocket No. 20251-214724-01).

⁶ See Comment by Marilyn Wallace (Feb. 18, 2025) (eDocket No. 20252-215450-01); Comment by Cindy Stamschror (Feb. 24, 2025) (eDocket No. 20252-215704-01); Comment by Gerry Gilsdorf (March 3, 2025) (eDocket No. 20253-215963-01); Comment by Tim Gilsdorf (March 3, 2025) (eDocket No. 20253-215963-01); and Comment by Tom Gilsdorf (March 3, 2025) (eDocket No. 20253-215963-01).

commenting landowners, Dairyland continues to find that RSA-B best minimizes the potential impacts of the Project along this segment of the Project. It is the shortest alternative under consideration, crosses the fewest waterbodies, and crosses fewer parcels than the other alternatives, while achieving the stated goal of minimizing impacts to dairy operations and residences along Highway 42 and the other alternatives.

Dairyland continues to support designating the Applicant's Proposed Route for the remaining portions of the route.⁷

Several landowners also provided comments requesting certain pole placements or alignments with the designated route.⁸ Dairyland will continue to work with landowners regarding these potential minimization measures once the Commission designates a route and issues a route permit. Prior to finalizing the route and completing the engineering design, it is difficult to commit to specific alignment shifts or pole placements. Dairyland has noted these landowner preferences and will work with the landowners to minimize impacts through the final design.

b. Stray Voltage.

Multiple public comments expressed concerns with the potential impacts of stray voltage from the Project on their homes and their livestock.^{9,10} As stated in the EA, "stray voltage" is voltage that exists between the neutral wire of the service entrance and grounded objects in buildings.¹¹ The term generally describes a voltage between two objects where no voltage difference should exist. It is a condition that can potentially occur on a property or on the electric service entrances to structures from distribution lines connected to these structures. Unlike distribution lines, which are the primary electrical system that connects to a secondary farmstead's electric system, transmission lines do not independently create stray voltage, because they do not connect to businesses or residences as distribution lines do.¹²

⁷ Williams Direct at 7:21-31 and 8:1-7.

⁸ See Comment by Marilyn Wallace (Feb. 18, 2025) (eDocket No. 20252-215450-01); Comment by Eric Bartsh (Feb. 24, 2025) (eDocket No. 20252-215706-01); Comment by Cindy Stamschror (Feb. 24, 2025) (eDocket No. 20252-215704-01); Comment by Linda Stamschror (Feb. 24, 2025) (eDocket No. 20252-215703-01); Comment by Toni McMillin (Feb. 24, 2025) (eDocket No. 20252-215700-01); and Comment by Angie and Marty Murphy (Feb. 24, 2025) (eDocket No. 20252-215698-01).

⁹ See Tom and Kay Miller and Plainview Veterinary Clinic (Feb. 13, 2025) (eDocket No. 20252-215359-01); Marilyn Wallace (Feb. 18, 2025) (eDocket No. 20252-215450-01); WebEx 12:00 p.m. Public Hearing Transcript (WebEx 12:00 p.m. Tr.) at 13-19, 28:5-13 (Nelson) (Feb. 12, 2025); WebEx 12:00 p.m. Tr. at 19-22 (Miller).

¹⁰ Ms. Jill Nelson provided lengthy comments attaching articles and studies on the effects of stray voltage on livestock. Dairyland has not separately assessed each of the studies Ms. Nelson refers to, as Dairyland believes the EA's discussion of the potential impacts of stray voltage appropriately captures the information most relevant to the Commission's routing decision. See Comment by Jill Nelson (March 3, 2025) (eDocket No. 20253-215961-01).

¹¹ EA at 58.

¹² EA at 58.

However, in some circumstances, transmission lines can induce a current on distribution lines that are parallel and directly under the transmission line. As described in Institute of Electrical and Electronics Engineers (IEEE) 1695, the magnetic fields associated with transmission system operation can induce a current in the conductive loops formed by the distribution system neutral, its connections to earth (e.g., ground rods), and the earth path between those connections. The amount of current that flows in each conductive loop and the amount of Neutral-to-Earth Voltage (NEV) created is dependent on numerous factors, including the amount of current in the transmission-phase conductors, the distance between the transmission and distribution systems, the integrity of distribution neutral and ground lead connections, and soil resistivity. Increased levels of NEV due to inductive coupling can result in increased levels of stray voltage on the distribution system.

Approximately 5.6 miles of the Applicant's Proposed Route are proposed to be collocated with area distribution lines.¹³ As noted in the Application, Dairyland currently understands that Xcel Energy and People's Energy Cooperative (People's) plan to bury the distribution lines where the Project overtakes them. Dairyland will follow the grounding and electric field requirements in Sections 5.4.1 and 5.4.2 of the Draft Route Permit (DRP), respectively. These standard conditions are routinely included in the Commission's transmission line route permits to avoid and minimize potential stray voltage, induced voltage, and electric field impacts of new transmission lines.

When following these recommended standards, Dairyland agrees with the EA's conclusion that stray voltage is not expected to occur and impacts from stray voltage are anticipated to be negligible.¹⁴ Nonetheless, Dairyland is sensitive to the area landowners' concerns, and Dairyland plans to take a proactive approach to demonstrate that the transmission line will not cause stray voltage issues at area farms. Dairyland is a local, not-for-profit generation and transmission electric cooperative based in La Crosse, Wisconsin. Dairyland provides the wholesale electrical requirements to more than 700,000 people through its local distribution cooperatives and municipal utilities. This includes People's, the distribution cooperative serving cooperative members in the area in which the Project will be located.

Based on its strong connection to rural residents in the Project area, as stated in the Application, Dairyland is committed to working with the area distribution utilities and landowners to conduct pre- and post- construction testing of dairy farms and confined animal operations (i.e., dairy cattle, goats, and swine) adjacent to the designated route to confirm that the Project is not causing induced voltage on the distribution system.¹⁵

¹³ Application at 3-1.

¹⁴ EA at 61 (Jan. 31, 2025) (eDocket No. 20251-214724-01) (EA).

¹⁵ Application at 8-23.

Tests will consist of IEEE 1695 NEV measurement at the customer service feed. Testing will be offered to dairy and confined animal operations directly adjacent¹⁶ to the route that are connected to distribution lines crossed by or parallel to the Project, as these are the areas where there is a limited risk of the transmission line inducing voltage onto the distribution system. Dairyland plans to issue a request for proposals to identify qualified contractors who can perform the pre- and post-testing.

Pre-testing will occur after distribution feeders have been re-located as part of the Project, and measurements will be taken on the neutral of distribution feeders that parallel the Project. This will capture any NEV independent of the transmission project. Measurements will be taken over a period of 24 to 48 hours to capture variation in the distribution and customer system loading. Similar post-testing will occur after the Project is in-service. If measurements determine that there are induced voltages above 0.5 volts (V) on the primary neutral of the utility service feed, mitigation will be provided. Because any induced voltage on a distribution feeder will dissipate as distances increase from the 161 kV transmission line, measurement and mitigation will only be completed on the service feeds closest to the Project.

As noted above, inclusion of RSA-AAA-2, As Modified, and RSA-B along with the Applicant's Proposed Route largely avoids known dairies and confined animal operations located adjacent to the route, particularly in locations with distribution lines running parallel or crossing the transmission line. Dairyland estimates approximately 7 dairy and confined animal operations are adjacent to the Applicant's Proposed Route, and approximately 6 dairy and confined animal operations are adjacent to the Applicant's Proposed Route with the addition of RSA-AAA-2, As Modified, and RSA-B.¹⁷

Dairyland supports the inclusion of a Special Condition 6.1 in the DRP requiring completion of pre- and post-testing for induced voltage. Dairyland proposes the following revisions to Special Condition 6.1 in the DRP:

6.1 Stray Voltage

The Permittee shall coordinate with the owners of all dairy farms, and any other ~~animal-agriculture~~ confined animal farms (i.e., dairy, goats and swine) adjacent to the route, for the purpose of explaining the energy and electrical standard effects addressed in sections 5.4.1 and 5.4.2. The Permittee shall demonstrate compliance with the consultation obligation in its pre-construction filing. The Permittee

¹⁶ Dairyland defines "adjacent" as those within 250 feet of the proposed alignment, consistent with the Region of Influence for stray voltage identified in the EA.

¹⁷ Dairyland used the Minnesota Pollution Control Agency "Feedlots in Minnesota" publicly available geospatial dataset updated on January 15, 2020 (available at <https://gisdata.mn.gov/dataset/env-feedlots>) to generate the initial list of potential feedlots on tracts that are within 250 feet of the proposed alignment. This data was further refined by Dairyland based on information provided by landowners.

shall conduct pre- and post-construction neutral-to-earth voltage measurements on the distribution neutral at service connection point for dairy and confined animal operations adjacent to the Designated Route.

c. EMF Impacts on Honeybees.

Marilyn Wallace, a homeowner in Kellogg, MN, submitted comments expressing concern about the Applicant's Proposed Route intersecting with the corner of her property. She also expressed concerns about the inability to continue beekeeping and the unknown impacts of close, long-term proximity to Electromagnetic Fields (EMF).¹⁸ Dairyland provides the following summary of research relevant to her concerns regarding potential impacts to honeybees.

In 2010, the Electric Power Research Institute (EPRI) produced a Research Paper indicating that bees use sensory and environmental cues to navigate between their hive and food sources and to communicate with other bees. In addition, they will use geomagnetic fields to communicate information. The Research Paper indicates that there is no evidence that bee navigation or communication is affected by the local electric field.¹⁹ The Research Paper concluded that the only adverse effects to beehives are when the electric field is high enough to produce conditions prone to shock.

In 2013, EPRI prepared a Technical Report to determine if the EMF produced by HVTL's has negative effects on native bee abundance, diversity, development, and behavior.²⁰ That study found no indication of negative impacts of EMF on bees and no statistically significant differences were found in floral visitation or pollination success in areas directly under the lines versus areas of similar habitat at least 100 meters away from the easements. This study also discusses the benefits of integrated vegetation management in HVTL corridors, which includes periodic cutting of tall vegetation and management of invasive species contributing to increased floral diversity and abundance and increased potential nesting habitat and therefore, higher bee abundance and species richness as compared to mowing.

The benefits of HVTL ROW on bees were further supported by 2018 EPRI study which found that, due to the linear shape of ROWs, they may serve as corridors allowing pollinators to disperse between fragmented habitats and forage through the landscape.²¹ Furthermore, ROWs are a benefit

¹⁸ Comment by Marilyn Wallace (Feb. 18, 2025) (eDocket No. 20252-215450-01).

¹⁹ EPRI. 2010. Honeybees and Power Line EMF Environments. Resource Paper – Electric Magnetic Fields (EMF) Health Assessment and Radio-Frequency Safety Program. November 2010.

²⁰ EPRI. 2013. Use of Transmission Line Easements for the Benefit of Native Bees.

²¹ EPRI. 2018. Overview of Power Companies and Pollinators. Available online at: https://xerces.org/sites/default/files/2018-07/18-017_01_Overview%20of%20powerlines%20and%20pollinators.pdf.

to pollinator populations in agricultural landscapes when they provide a natural or semi-natural habitat.²²

A 2023 study conducted in the Maule region of Chile focused on honeybees along an HVTL and mobile phone infrastructure corridor in an ephemeral herbaceous vegetation community dominated by the non-native California poppy (*Eschscholtzia californica*). The study evaluated tall structures (20 meters [m] or approximately 66 feet) that generated EMF close to 100 milligauss (mG) or 10 microtesla (μ T) recorded between 12 and 17 m (39 and 56 feet) from the base of the tower and at 25 to 30 centimeters (cm) (10 to 12 inches). For comparison, Section 8.3.4.2 of the Application identifies the maximum magnetic field under expected peak demand conditions for this 161-kV transmission line is 140 mG (XX μ T), which is on the same order as the EMF evaluated in this study. This study found that although EMF did not affect honeybee abundance in the study area, it caused honeybees to preferentially forage in areas with lower *E. californica* abundance farther away from the transmission line towers even if there was higher *E. californica* abundance near the towers. The authors attribute this to the potential decreased cognitive and motor abilities and orientation capacities associated with the exposure to EMF and concluded that decreased pollinator visitation may contribute to reduced plant reproductive success at a local scale.²³

Another study completed in 2018 assessed acute exposure of flying insects to EMF in a laboratory setting to simulate potential exposure of pollinators in the field crossing an EMF boundary of a powerline. This EMF levels in this study ranged from 200 mG to 1,000 mG (20-100 μ T) at ground level below the powerline conductors to 10,000 mG to 70,000 mG (1,000 – 7,000 μ T) within one meter of the conductors.²⁴ For comparison, this is between one and seven times higher than the maximum magnetic field under expected peak demand conditions for this 161-kV transmission line (Section 8.3.4.2 of the Application). That study found that short-term exposure (i.e., 1 minute) to EMF impacted “the cognitive abilities of bees by reducing olfactory learning acquisition, and that the magnitude was dependent upon the strength of the EMF.” Exposure also increased wingbeat frequency and reduced the number of successful foraging flights to a food source. Performance also varied depending on the hive of origin.

A 2019 study exposed honeybees to 50 Hz extremely low-frequency (ELF) EMF in a laboratory setting to investigate the potential effects of ELF EMF on aggressive learning and aggression levels. Bees in this study were exposed for 17 hours to 1,000 mG to 10,000 mG (100 to 10,000

²² Menz, M.H. et al. 2011. Reconnecting plants and pollinators: challenges in the restoration of pollination mutualisms. Available online at: https://xerces.org/sites/default/files/2018-07/18-017_01_Overview%20of%20powerlines%20and%20pollinators.pdf.

²³ Molina-Montenegro, Marco et al. May 2023. Electromagnetic fields disrupt the pollination service by honeybees. Available online at <https://www.science.org/doi/10.1126/sciadv.adh1455>.

²⁴ Shepherd, S. et al. May 2018. Extremely Low Frequency Electromagnetic Fields Impair the Cognitive and Motor Abilities of Honeybees. Available online at: <https://www.nature.com/articles/s41598-018-26185-y>.

μT).²⁵ For comparison, this is between seven and seventy times higher than the maximum magnetic field under expected peak demand conditions for this 161-kV transmission line (Section 8.3.4.2 of the Application). The results indicate that beehives placed under power lines with short-term exposure to similar levels of ELF EMF at ground level can affect honeybees in terms of their “conditioning to negative stimuli and the intensity of their aggressive behavior.” The ecological impacts may include honeybees’ latency in responding to new threats; however, increased aggression levels may allow for greater resiliency to environmental stresses and immune challenges. The study acknowledges that there are other factors in the decision-making process of how a honeybee may react to an environmental stressor and the consequences are not known at this time. It is not yet understood how the honeybees would respond to negative stimuli with exposure to ELF EMF in the field; however, it is possible that long-term chronic exposure to ELF EMFs could lead to reduced cognitive abilities.²⁶

Based on this research, it does not appear that the expected levels of EMF resulting from the Project would result in any negative impacts to honeybees within the HVTL ROW. Additionally, in recent transmission line route permit proceedings, EERA has concluded,²⁷ and the Commission has found that impacts to honeybees are not expected.²⁸

d. Response to MDNR.

On March 4, 2025, the MDNR provided comments responding to the EA and DRP.²⁹ The MDNR letter recommended special permit conditions requiring (1) a Karst Survey Plan, (2) conditions listed in Natural Heritage Reviews via the Minnesota Conservation Explorer (MCE) (MCE 2023-00935 and MCE 2024-000881); (3) development of a Calcareous Fen Management Plan (4) facility lighting; (5) dust control; (6) wildlife-friendly erosion control; and (7) water appropriation permits. Dairyland agrees with most of MDNR’s recommendations, with some modifications as discussed below.

²⁵ Shephard, S. et al. October 2019. Increased Aggression and Reduced Aversive Learning in Honeybees Exposed to Extremely Low Frequency Electromagnetic Fields. Available online at: <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0223614#pone.0223614>.

²⁶ See *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, EA at 98-100 (Dec. 28, 2023).

²⁷ See *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, EA at 102 (Dec. 28, 2023).

²⁸ See *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, Order Adopting Administrative Law Judge Report and Issuing Route Permit at ordering paragraph 2 (June 7, 2024).

²⁹ Comment by MDNR (March 4, 2025) (eDocket Nos. 20253-216053-01, 20253-216053-02, 20253-216053-03, 20253-216053-04).

Regarding item (1), Special Condition 6.4 of the DRP already includes a requirement to develop a Karst Survey Plan and coordinate with MDNR.

Regarding item (2), Ms. Britta Bergland's Direct Testimony noted Dairyland's commitment to MDNR Natural Heritage staff's recommended avoidance measures for the Blanding's turtle, wood turtle, timber rattlesnake and four state-listed plant species under MCE 2023-00935.³⁰ The MDNR referred to this commitment in its attached email. As noted in Dairyland's March 3, 2025 comments on the Draft EA and DRP, Dairyland continues to recommend that the Route Permit require a resubmittal of Natural Heritage Review and continued consultation with MDNR, since the Natural Heritage Reviews are valid for one year, and any subsequent changes could otherwise require an amendment to the Route Permit based on the specific recommendations valid prior to the start of construction. For example, the review contained within Natural Heritage Review MCE 2023-00935 expires on April 2, 2025,³¹ and the review contained within Natural Heritage Review MCE 2024-000881 expires on December 16, 2025.³² Both dates precede the date of construction of the Project. Each Natural Heritage Review states the following: "If project details change or the project has not occurred within one year, please resubmit the project for review within one year of initiating activities."³³ Including a general requirement to submit a new Natural Heritage Review closer to construction would be preferable to language referencing reviews that would not be valid at the time of construction.

Regarding items (3), (4), (5), (6) and (7), Dairyland has no objection to MDNR's recommendations regarding facility lighting, dust control, wildlife-friendly erosion control or water appropriation permits.

II. Conclusion.

Dairyland appreciates the public participation in this docket and the opportunity to respond to address issues raised during the public hearings and comment period. Dairyland respectfully requests that the ALJ recommend, and the Commission approve a route permit for the Project following a designated route that includes the Applicant's Proposed Route as modified by RSA-AAA-2, As Modified, and RSA-B. Dairyland also requests that the Route Permit reflect EERA's recommendations in the DRP included in Revised Appendix D to the EA, as modified by Dairyland's recommended changes in its March 3, 2025, comments and this response.

³⁰ Comment by MDNR at 2 (March 4, 2025) (eDocket No. 20253-216053-01).

³¹ EA at 214.

³² EA at 227.

³³ EA at 221 and 231.

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These comments have been e-filed through www.edocket.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/ Christina K. Brusven

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**In the Matter of the Application of Dairyland
Power Cooperative for a Route Permit to
Relocate an Existing 161 kV Transmission Line
in Wabasha County, Minnesota.**

**OAH Docket No. 5-2500-40184
MPUC Docket No. ET3/TL-23-388**

CERTIFICATE OF SERVICE

Maia Martinez certifies that on the 10th day of March, 2025, she e-filed a true and correct copy of the Response to Public Comments on behalf of Dairyland Power Cooperative via eDockets (www.edockets.state.mn.us):

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

Executed on: March 10, 2025

Signed: /s/ Maia Martinez

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