

STATE OF MINNESOTA  
COURT OF ADMINISTRATIVE HEARINGS

FOR THE PUBLIC UTILITIES COMMISSION

In the Matter of the Application of Great  
River Energy for a Route Permit  
Application for the Laketown 115-kV  
Transmission Line in Carver County,  
Minnesota

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**SUPPLEMENTAL FINDINGS OF FACT,  
CONCLUSIONS OF LAW, AND  
RECOMMENDATIONS**

This matter came before Administrative Law Judge Kimberly Middendorf following remand by the Minnesota Public Utilities Commission (Commission) for additional record development regarding Route Alternative B. In its October 2, 2025, Order Adopting Administrative Law Judge Report as Modified, Requiring Additional Record Development, and Remanding for Further Proceedings (the October 2025 Order), the Commission adopted the Judge's Report as modified (Commission-Adopted Report). The Commission ordered Great River Energy (GRE) and Minnesota Valley Electric Cooperative (MVEC) (together, the Applicants) to hire an independent engineering consultant to analyze Applicant's claims regarding reliability and costs of Route Alternative B. The Commission remanded the matter to the Court of Administrative Hearings to set the schedule and procedure for further record development and to issue findings, conclusions, and recommendations focused on additional comparison of the Applicants' Proposed Route and Route Alternative B.

Haley Waller Pitts, Fredrikson & Byron, P.A., appeared on behalf of the Applicants. Logan Hicks, Environmental Review Manager, participated on behalf of the Commission's Energy Infrastructure Permitting (EIP) staff.

**SUMMARY OF RECOMMENDATIONS**

The Judge recommends that the Commission grant a route permit for Route Alternative B. The difference in cost or reliability between Applicants' Proposed Route and Route Alternative B is not significant enough to outweigh the greater advantages of Route Alternative B. Route Alternative B uses existing right-of-way to a greater extent than the Proposed Route and imposes fewer burdens on communities and property owners. The Judge further recommends that the Route Permit reflects an alignment of Route Alternative B on the north side of Augusta Road.

Based on the evidence in the hearing record, the Judge makes the following:

## FINDINGS OF FACT

### I. SUPPLEMENTAL PROCEDURAL HISTORY

1. On October 2, 2025, the Commission issued the October 2025 Order, which remanded this matter to the Court of Administrative Hearings to set the schedule and procedure for further record development and to issue findings, conclusions, and recommendations focused on comparison of the Applicants' Proposed Route and Route Alternative B by obtaining:

a. Greater detail on the reliability concerns associated with Route Alternative B as compared to the Applicants' Proposed Route, the steps necessary to address the reliability concerns, and a more detailed description of the cost differential of achieving a similar level of reliability of the two route options;

b. The Applicants' response to the reliability and cost report of the independent consultant;

c. Comments from Xcel Energy regarding any concerns about the reliability and cost of Route Alternative B;

d. A reliability and cost analysis of moving the proposed alignment for Route Alternative B to the north side of Augusta Road on the existing distribution right-of-way with the distribution line either collocated on the project structures or buried; and

e. Further input from local units of government and landowners who own property within the proposed route width of either route to provide any additional comments on any of the routing factors, including reliability requirements and cost estimates, as well as possible realignment of Route Alternative B to the north side of Augusta Road, to allow for a better side-by-side comparison.

2. On October 10, 2025, Judge Middendorf issued a Notice of and Order for Prehearing Conference<sup>1</sup> and an Amended Notice of and Order for Prehearing Conference.<sup>2</sup> The Amended Notice set a prehearing conference for October 22, 2025.

3. On October 16, 2025, the Applicants filed an independent engineer and scope of review proposal with the Commission as required by Paragraph 4 of the October 2025 Order.<sup>3</sup>

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<sup>1</sup> Notice of and Order for Prehearing Conference (Oct. 10, 2025) (eDocket No. [202510-223769-01](#)).

<sup>2</sup> Amended Notice of and Order for Prehearing Conference (Oct. 10, 2025) (eDocket No. [202510-223811-01](#)).

<sup>3</sup> Proposed Independent Review and Scope (Oct. 16, 2025) (eDocket No. [202510-224008-01](#)).

4. On October 20, 2025, the Commission Executive Secretary filed a letter approving POWER Engineers, the proposed independent engineer, to conduct an independent review of the Project in accordance with Paragraph 4 of the October 2025 Order.<sup>4</sup>

5. On October 22, 2025, the Judge issued a Third Prehearing Order.<sup>5</sup>

6. On October 28, 2025, Commission EIPT staff, formerly known as EERA, filed a Supplemental Appendix C to the Environmental Assessment (EA).<sup>6</sup>

7. Also on October 28, 2025, EIP staff filed a notification of mailing of Supplemental Appendix C to the EA to the Carver County Library.<sup>7</sup>

8. On October 30, 2025, the Commission issued minutes from the September 4, 2025, Commission meeting.<sup>8</sup>

9. On November 4, 2025, Shaddix & Associates filed a transcript from the prehearing conference held on October 22, 2025.<sup>9</sup>

10. On November 10, 2025, POWER Engineers filed its Independent Review (POWER Report).<sup>10</sup>

11. On November 17, 2025, the Commission issued a Notice of Comment Period, requesting initial comments by December 16, 2025, and reply comments by December 23, 2025.<sup>11</sup>

12. On December 8, 2025, the City of Victoria submitted a written comment indicating it did not have concerns with either option.<sup>12</sup>

13. On December 15, 2025, Northern States Power Company d/b/a Xcel Energy (Xcel) submitted a written comment stating it had no preference. Xcel “has no reliability concerns regarding either Applicants’ Proposed Route or Route Alternative B. From a cost perspective, [Xcel] sees no practical difference between the two routes due to the way that the costs would be allocated by MISO.”<sup>13</sup>

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<sup>4</sup> Commission Letter Approving Independent Engineer and Scope (Oct. 20, 2025) (eDocket No. [202510-224111-01](#)).

<sup>5</sup> Third Prehearing Order (Oct. 22, 2025) (eDocket No. [202510-224203-01](#)).

<sup>6</sup> EA Supplemental Appendix C (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)).

<sup>7</sup> Notification of EA Supplemental Appendix C to Library (Oct. 28, 2025) (eDocket No. [202510-224363-01](#)).

<sup>8</sup> Minutes – September 4, 2025 Commission Meeting (Oct. 30, 2025) (eDocket No. [202510-224454-01](#)).

<sup>9</sup> Prehearing Transcript held on October 22, 2025 (Nov. 4, 2025) (eDocket No. 202511-224632-01).

<sup>10</sup> POWER Engineers Independent Review (Nov. 10, 2025) (eDocket No. [202511-224791-01](#)).

<sup>11</sup> Notice of Comment Period on Independent Consultant Report and for Additional Record Development (Nov. 17, 2025) (eDocket No. [202511-224978-01](#)).

<sup>12</sup> City of Victoria Comment (Dec. 8, 2025) (eDocket No. [202512-225603-01](#)).

<sup>13</sup> Xcel Energy Comments (Dec. 15, 2025) (eDocket No. [202512-225858-01](#)). These comments reference a switch structure. For purposes of clarity, an in- and out-configuration is currently planned, regardless of route selected.

14. United States Fish and Wildlife Service (USFWS) offered considerations intended to minimize impacts to wildlife. USFWS recommended “limiting forest clearing activities to occur outside of the migratory bird nesting season (March 1 – August 31) and summer occupancy period for Northern Long-eared Bat (April 15 – September 30).”<sup>14</sup>

15. On December 16, 2025, EIP staff filed a batch of nine comments received from members of the public.<sup>15</sup>

16. Also on December 16, 2025, the Applicants submitted initial comments.

17. On December 17, 2025, EIP staff filed additional public comments received from the City of Carver, Russell Schlegelmilch, Jo Eiden, Anthony Schuster, Patty Eiden, and Greg Boe.<sup>16</sup>

18. On December 18, 2025, EIP staff filed additional public comment from Don Schlegelmilch.<sup>17</sup>

19. On December 23, 2025, MVEC submitted reply comments in support of Route Alternative B.<sup>18</sup>

20. Also on December 23, 2025, GRE submitted reply comments in support of Route Alternative B.<sup>19</sup>

21. On December 30, 2025, GRE filed supplemental proposed findings of fact, conclusions of law, and recommendations.

22. EIP staff filed a response to the proposed findings, indicating EIP had no comment.<sup>20</sup>

## II. ROUTES FURTHER EVALUATED IN SUPPLEMENTAL PROCESS

23. This Supplemental Report is limited to the record developed during the supplemental process with respect to the Proposed Route and Route Alternative B.

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<sup>14</sup> USFWS Comments (Dec. 15, 2025) (eDocket No. [202512-225823-01](#)).

<sup>15</sup> Public Comments Batch 1 (Dec. 16, 2025) (eDocket No. [202512-225923-01](#)).

<sup>16</sup> City of Carver Comments (Dec. 17, 2025) (eDocket No. [202512-225951-01](#)); Russell Schlegelmilch Comment (Dec. 17, 2025) (eDocket No. [202512-225936-01](#)); Jo Eiden Comment (Dec. 17, 2025) (eDocket No. [202512-225940-01](#)); Anthony Schuster Comment (Dec. 17, 2025) (eDocket No. [202512-225949-01](#)); Patty Eiden Comment (Dec. 17, 2025) (eDocket No. [202512-225950-01](#)); Greg Boe Comment (Dec. 17, 2025) (eDocket No. [202512-225952-01](#)).

<sup>17</sup> Don Schlegelmilch Comment (Dec. 18, 2025) (eDocket No. [202512-225996-01](#)).

<sup>18</sup> MVEC Reply Comments (Dec. 23, 2025) (eDocket No. [202512-226136-01](#)).

<sup>19</sup> Great River Energy Reply Comments (Dec. 23, 2025) (eDocket No. [202512-226177-01](#)).

<sup>20</sup> EIP Reply Comments on Proposed Supplemental Findings of Fact (Jan. 7, 2026) (eDocket No. 20261-226600-01).

## **A. Proposed Route.**

24. The Commission-Adopted Report provides a description of the Proposed Route.<sup>21</sup> The Proposed Route did not change during the Supplemental Comment Period.

25. In the POWER Report, POWER Engineers determined the Proposed Route more evenly segments the load along the existing 115 kV W. Waconia – Scott County transmission line and allows for a circuit breaker to be placed strategically near a central location of the line, which is a cost-effective, sustainable solution and would alleviate the need for a greenfield breaker station in the future. The Proposed Route also allows for more options to restore customers through back feeding in the event of an outage, lessening outage durations.<sup>22</sup>

## **B. Route Alternative B.**

26. The Commission-Adopted Report provides a description of Route Alternative B.<sup>23</sup> The October 2025 Order also required analysis of moving the alignment for Route Alternative B to the north side of Augusta Road.<sup>24</sup>

27. Route Alternative B would meet the need for the Project and serve MVEC's load in the local area. However, Route Alternative B lacks the increased reliability benefits the Proposed Route offers. Supplemental Appendix C to the EA adopts GRE's opinion that Route Alternative B serves today's users but notes future system modifications not proposed as part of this Project would be needed if load growth continues in this area. This would include the construction and development of a greenfield breaker station at some point in the future. The greenfield breaker station would likely be built on a 20-acre site, and would be built at a location that divides the system into three separate circuits, significantly reducing exposure.<sup>25</sup>

28. Comments submitted by members of the public during the Supplemental Comment Period expressed near universal support for Route Alternative B, primarily focused on its higher percentage of right-of-way sharing and increased distance from the City of Carver.<sup>26</sup> No one opposed Route Alternative B.

29. After review of the comments filed during the initial comment period, both Applicants submitted reply comments that expressed support for Route Alternative B.<sup>27</sup>

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<sup>21</sup> Commission-Adopted Report at ¶¶ 75.

<sup>22</sup> POWER Engineers Independent Review at 2-4 (Nov. 10, 2025) (eDocket No. [202511-224791-01](#)).

<sup>23</sup> Commission-Adopted Report at ¶¶ 76-83.

<sup>24</sup> *Id.*, Order ¶ 5.

<sup>25</sup> EA Supplemental Appendix C at 2 (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)).

<sup>26</sup> City of Carver Comments (Dec. 17, 2025) (eDocket No. [202512-225951-01](#)); Public Comments Batch 1 (Dec. 16, 2025) (eDocket No. [202512-225923-01](#)); Russell Schlegelmilch Comment (Dec. 17, 2025) (eDocket No. [202512-225936-01](#)); Anthony Schuster Comment (Dec. 17, 2025) (eDocket No. [202512-225949-01](#)); Greg Boe Comment (Dec. 17, 2025) (eDocket No. [202512-225952-01](#)); Don Schlegelmilch Comment (Dec. 18, 2025) (eDocket No. [202512-225996-01](#)).

<sup>27</sup> MVEC Reply Comments (Dec. 23, 2025) (eDocket No. [202512-226136-01](#)); Great River Energy Reply Comments (Dec. 23, 2025) (eDocket No. [202512-226177-01](#)).

### III. PROJECT SCHEDULE

30. The Applicants anticipate starting construction on the Laketown Substation in spring 2027 and on the Transmission Line in fall 2027 and then energizing the Project in the summer of 2028.<sup>28</sup>

31. The Project schedule is driven by the delivery of the substation transformer, which is scheduled for August 2027. Substation site preparation work, such as substation grading, needs to be commenced in Spring 2027 to accommodate and prepare for that delivery. Delays to the Project schedule could impact the Project's ability to meet the critical need in the Project area.<sup>29</sup>

### IV. PROJECT COSTS

32. Applicants estimate the Project, if constructed on the Proposed Route, will cost approximately \$17,965,000. Of that cost, the Transmission Line will cost approximately \$11,043,500; the GRE transmission substation infrastructure will cost approximately \$2,861,500; and the Laketown Substation will cost approximately \$4,060,000.<sup>30</sup>

33. Route Alternative B is estimated to cost approximately \$15,549,987.<sup>31</sup>

34. If Route Alternative B is selected, GRE would later assess whether a new greenfield breaker station would be added between the Augusta and Victoria Substations. A breaker station is not proposed as part of this Project. The claimed need for a breaker station is based on GRE's current anticipated load growth. Other projects may otherwise alleviate the anticipated need. GRE predicts the additional breaker station would be needed within 10 to 15 years while acknowledging its timeframe is variable, and could accelerate if load growth accelerates, or occur later if load growth is slower than currently anticipated. GRE estimated the construction and installation of a greenfield breaker station needed for Route Alternative B would cost approximately \$9,475,000.<sup>32</sup> POWER Engineers reviewed these estimates and determined they were reasonable and aligned with POWER Engineers' own analysis, which estimated between \$10.3 and \$13.4 million.<sup>33</sup>

### V. PUBLIC AND LOCAL GOVERNMENT PARTICIPATION

35. The Commission-Adopted Report discusses the public, stakeholders, and local governments, and stakeholders' participation in the route permitting process.<sup>34</sup>

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<sup>28</sup> Ex. APP-2 at 3-8 (Application); Ex. APP-19 at 8 (Direct Testimony of M. Swenson).

<sup>29</sup> Applicants' Reply Comments to New and Modified Decision Options at 7-8 (Sept. 2, 2025) (eDocket No. [20259-222652-02](#)).

<sup>30</sup> Commission-Adopted Report at ¶ 99.

<sup>31</sup> Commission-Adopted Report at ¶ 292.

<sup>32</sup> EA Supplemental Appendix C at 14 (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)).

<sup>33</sup> POWER Engineers Independent Review at 5 (Nov. 10, 2025) (eDocket No. [202511-224791-01](#)).

<sup>34</sup> Commission-Adopted Report at ¶¶ 103-116.

36. GRE also sent correspondence to all landowners along the Proposed Route and Route Alternative B, as well as local government units, to inform them of the supplemental process and encourage them to participate in the current comment period and/or to contact GRE with any questions.<sup>35</sup> GRE summarized the responses it received to this correspondence in its Initial Comments.<sup>36</sup>

37. During the supplemental comment period, two local government units,<sup>37</sup> one federal agency,<sup>38</sup> one utility company,<sup>39</sup> and fifteen members of the public submitted written comments.<sup>40</sup> All comments either expressed no preference or a strong preference for Route Alternative B due to its higher percentage of right-of-way sharing and increased distance from the City of Carver. The Applicants submitted reply comments on December 23, 2025.<sup>41</sup>

## VI. FACTORS FOR A ROUTE PERMIT

38. The Power Plant Siting Act (PPSA), Minn. Stat. ch. 216E, requires that route permit determinations “be guided by the state’s goal to conserve resources, minimize environmental impacts, minimize human settlement and other land use conflicts, and ensure the state’s electric energy security through efficient, cost-effective power supply and electric transmission infrastructure.”<sup>42</sup>

39. Under the PPSA, the Commission must be guided by the following responsibilities, procedures, and considerations:

- (1) evaluation of research and investigations relating to the effects on land, water and air resources of large electric power generating plants and high-voltage transmission lines and the effects of water and air discharges and electric and magnetic fields resulting from such facilities on public health and welfare, vegetation, animals, materials and aesthetic values, including baseline studies, predictive modeling, and evaluation of new or improved methods for minimizing adverse impacts of water and air discharges and other matters pertaining to the effects of power plants on the water and air

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<sup>35</sup> Applicants’ Initial Comments at 2-4 (Dec. 16, 2025) (eDocket No. [202512-225903-01](#)).

<sup>36</sup> See Applicants’ Initial Comments (Dec. 16, 2025) (eDocket No. [202512-225903-01](#)).

<sup>37</sup> City of Carver Comments (Dec. 17, 2025) (eDocket No. [202512-225951-01](#)); City of Victoria Comments (Dec. 8, 2025) (eDocket No. [202512-225603-01](#)).

<sup>38</sup> USFWS Comments (Dec. 15, 2025) (eDocket No. [202512-225823-01](#)).

<sup>39</sup> Xcel Energy Comments (Dec. 15, 2025) (eDocket No. [202512-225858-01](#)).

<sup>40</sup> Public Comments Batch 1 (Dec. 16, 2025) (eDocket No. [202512-225923-01](#)); Russell Schlegelmilch Comment (Dec. 17, 2025) (eDocket No. [202512-225936-01](#)); Jo Eiden Comment (Dec. 17, 2025) (eDocket No. [202512-225940-01](#)); Anthony Schuster Comment (Dec. 17, 2025) (eDocket No. [202512-225949-01](#)); Patty Eiden Comment (Dec. 17, 2025) (eDocket No. [202512-225950-01](#)); Greg Boe Comment (Dec. 17, 2025) (eDocket No. [202512-225952-01](#)); Don Schlegelmilch Comment (Dec. 18, 2025) (eDocket No. [202512-225996-01](#)).

<sup>41</sup> See MVEC Reply Comments (Dec. 23, 2025) (eDocket No. [202512-226136-01](#)); Great River Energy Reply Comments (Dec. 23, 2025) (eDocket No. [202512-226177-01](#)).

<sup>42</sup> Minn. Stat. § 216E.03, subd. 7 (2024). Minn. Stat. Ch. 216I became effective on July 1, 2025. Because the Application was filed prior to July 1, 2025, Minn. Stat. Ch. 216E applies to the Application.

environment;

- (2) environmental evaluation of sites and routes proposed for future development and expansion and their relationship to the land, water, air and human resources of the state;
- (3) evaluation of the effects of new electric power generation and transmission technologies and systems related to power plants designed to minimize adverse environmental effects;
- (4) evaluation of the potential for beneficial uses of waste energy from proposed large electric power generating plants;<sup>43</sup>
- (5) analysis of the direct and indirect economic impact of proposed sites and routes including, but not limited to, productive agricultural land lost or impaired;
- (6) evaluation of adverse direct and indirect environmental effects that cannot be avoided should the proposed site and route be accepted;
- (7) evaluation of alternatives to the applicant's proposed site or route proposed pursuant to subdivisions 1 and 2;
- (8) evaluation of potential routes that would use or parallel existing railroad and highway rights-of-way;
- (9) evaluation of governmental survey lines and other natural division lines of agricultural land so as to minimize interference with agricultural operations;
- (10) evaluation of the future needs for additional high-voltage transmission lines in the same general area as any proposed route, and the advisability of ordering the construction of structures capable of expansion in transmission capacity through multiple circuiting or design modifications;
- (11) evaluation of irreversible and irretrievable commitments of resources should the proposed site or route be approved;
- (12) when appropriate, consideration of problems raised by other state and federal agencies and local entities;
- (13) evaluation of the benefits of the proposed facility with respect to (i) the protection and enhancement of environmental quality, and (ii) the

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<sup>43</sup> Factor 4 is not applicable because Applicant is not proposing to site a large electric generating plant in this docket.

reliability of state and regional energy supplies;

- (14) evaluation of the proposed facility's impact on socioeconomic factors; and
- (15) evaluation of the proposed facility's employment and economic impacts in the vicinity of the facility site and throughout Minnesota, including the quantity and quality of construction and permanent jobs and their compensation levels. The commission must consider a facility's local employment and economic impacts, and may reject or place conditions on a site or route permit based on the local employment and economic impacts.

40. In addition, Minn. Stat. § 216E.03, subd. 7(e), provides that the Commission “must make specific findings that it has considered locating a route for a high-voltage transmission line [(HVTL)] on an existing high-voltage transmission line route and the use of parallel existing highway right-of-way and, to the extent those are not used for the route, the [C]ommission must state the reasons.”<sup>44</sup>

41. In addition to the PPSA, the Commission is governed by Minn. R. 7850.4100, which mandates consideration of the following factors when determining whether to issue a route permit for a HVTL:

- A. effects on human settlement, including, but not limited to, displacement, noise, aesthetics, cultural values, recreation, and public services;
- B. effects on public health and safety;
- C. effects on land-based economies, including, but not limited to, agriculture, forestry, tourism, and mining;
- D. effects on archaeological and historic resources;
- E. effects on the natural environment, including effects on air and water quality resources and flora and fauna;
- F. effects on rare and unique natural resources;
- G. application of design options that maximize energy efficiencies, mitigate adverse environmental effects, and could accommodate expansion of transmission or generating capacity;
- H. use or paralleling of existing rights-of-way, survey lines, natural division lines, and agricultural field boundaries;

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<sup>44</sup> See Minn. Stat. § 216E.03, subd. 7(e).

- I. use of existing large electric power generating plant sites;<sup>45</sup>
- J. use of existing transportation, pipeline, and electrical transmission systems or rights-of-way;
- K. electrical system reliability;
- L. costs of constructing, operating, and maintaining the facility which are dependent on design and route;
- M. adverse human and natural environmental effects which cannot be avoided; and
- N. irreversible and irretrievable commitments of resources.<sup>46</sup>

42. There is sufficient evidence in this record to assess the Project using the criteria and factors set forth above.

## **VII. APPLICATION OF ROUTING FACTORS TO THE PROPOSED ROUTE AND ROUTE ALTERNATIVE B**

### **A. Effects on Human Settlement.**

43. Minnesota law requires consideration of the Project's effects on human settlement, including displacement of residences and businesses, noise created by construction and operation of the Project, and impacts to aesthetics, cultural values, recreation, and public services.<sup>47</sup> The Commission-Adopted Report previously discussed these factors, and the findings in this Supplemental Report are limited to a comparison of the Proposed Route and Route Alternative B, as developed during the Supplemental Comment Period.<sup>48</sup>

#### **1. Displacement.**

44. The record developed during the Supplemental Comment Period does not reflect that any existing residences or businesses will be displaced by the Proposed Route or Route Alternative B.<sup>49</sup>

45. There are no residences within 50 feet of any of the routing options. The Proposed Route has no residences within 100 feet of the alignment; and Route Alternative B has one residence within 100 feet of the alignment.<sup>50</sup> If the alignment of

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<sup>45</sup> This factor is not applicable because it applies only to power plant siting.

<sup>46</sup> See Minn. R. 7850.4100.

<sup>47</sup> Minn. Stat. § 216E.03, subd. 7(b); Minn. R. 7850.4100(A).

<sup>48</sup> Commission-Adopted Report at ¶¶ 122-185.

<sup>49</sup> See EA Supplemental Appendix C (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)).

<sup>50</sup> Ex. EERA-11 at 26 (EA).

Route Alternative B is moved from the south to the north side of Augusta Road between Kelly Avenue and Jersey Avenue, the impacted residence would be more than 100 feet from the transmission line centerline.<sup>51</sup>

## **2. Noise.**

46. No further record development regarding noise occurred during the Supplemental Comment Period, and the Commission previously determined that the Project will comply with state noise requirements, regardless of which route is selected.<sup>52</sup>

## **3. Aesthetics.**

47. Both the Proposed Route and Route Alternative B will introduce new built features—structures, conductors, and a substation—on the landscape. The Applicants should be required to work with landowners to identify concerns related to Project aesthetics regardless of which route is selected.<sup>53</sup>

48. During the Supplemental Comment Period, members of the public expressed concern about potential visual impacts of the Proposed Route.<sup>54</sup>

## **4. Land Use and Zoning.**

49. During the Supplemental Comment Period, some comments documented concern about the Proposed Route's potential impacts on agriculture, particularly in areas where it does not follow existing road right-of-way, and on future development outside the City of Carver.<sup>55</sup>

50. Agricultural impacts were addressed in Chapter 4 of the EA, and that analysis continues to reflect potential impacts on the Proposed Route and Route Alternative B.<sup>56</sup>

51. With respect to potential future development, the City of Carver reaffirmed its prior position regarding the Proposed Route, expressing concern about the Proposed Route's potential limitation on future development.<sup>57</sup> GRE considers 115 kV facilities to be common features on the landscape and typically consistent with residential, commercial, and industrial development, particularly in the future timeframe contemplated

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<sup>51</sup> See *id.*

<sup>52</sup> Commission-Adopted Report ¶¶ 136, 138.

<sup>53</sup> Ex. EERA-11 at 26-27 (EA).

<sup>54</sup> Anthony Schuster Comment (Dec. 17, 2025) (eDocket No. [202512-225949-01](#)); Public Comments Batch 1 (Dec. 16, 2025) (eDocket No. [202512-225923-01](#)).

<sup>55</sup> See City of Victoria Comments (Dec. 8, 2025) (eDocket No. 202512-225603-01), Public Comments Batch 1 (Dec. 16, 2025) (eDocket No. [202512-225923-01](#)); Russell Schlegelmilch Comment (Dec. 17, 2025) (eDocket No. [202512-225936-01](#)); Anthony Schuster Comment (Dec. 17, 2025) (eDocket No. [202512-225949-01](#)); Greg Boe Comment (Dec. 17, 2025) (eDocket No. [202512-225952-01](#)); Don Schlegelmilch Comment (Dec. 18, 2025) (eDocket No. [202512-225996-01](#)).

<sup>56</sup> Ex. EERA-11 at 52-55 (EA).

<sup>57</sup> City of Carver Comments (Dec. 17, 2025) (eDocket No. [202512-225951-01](#)).

by the City of Carver.<sup>58</sup> The record likewise reflects that the City of Carver and GRE have met and corresponded during the Supplemental Comment Period.<sup>59</sup>

## **5. Cultural Values.**

52. The record developed during the Supplemental Comment Period does not reflect that cultural values will be affected by the Proposed Route or Route Alternative B.<sup>60</sup>

## **6. Recreation.**

53. The record developed during the Supplemental Comment Period does not reflect that recreation will be affected by the Proposed Route or Route Alternative B.<sup>61</sup>

## **7. Socioeconomics.**

54. The record developed during the Supplemental Comment Period does not reflect that the Project will negatively impact socioeconomics if either the Proposed Route or Route Alternative B is selected.<sup>62</sup>

## **8. Environmental Justice.**

55. The record developed during the Supplemental Comment Period does not reflect that environmental justice will be affected by the Proposed Route or Route Alternative B.<sup>63</sup>

## **9. Public Service and Infrastructure.**

56. The record developed during the Supplemental Comment Period does not reflect that public services or infrastructure will be affected by the Proposed Route or Route Alternative B.

## **10. Electronic Interference.**

57. The record developed during the Supplemental Comment Period does not reflect that the Proposed Route or Route Alternative B will result in electronic interference.<sup>64</sup>

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<sup>58</sup> Ex. APP-17 at 3-6 (Response to Scoping Comments); Ex. APP-21 at 12-14 (Comments regarding EA); Applicants' Post-Hearing Comments at 9 (June 9, 2025) (eDocket No. [20256-219727-01](#)).

<sup>59</sup> Applicants' Initial Comments at 2-3 (Dec. 16, 2025) (eDocket No. [202512-225903-01](#)).

<sup>60</sup> See EA Supplemental Appendix C (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)).

<sup>61</sup> See EA Supplemental Appendix C (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)).

<sup>62</sup> See EA Supplemental Appendix C (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)).

<sup>63</sup> See EA Supplemental Appendix C (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)).

<sup>64</sup> Commission-Adopted Report at ¶¶ 183-185.

## **B. Effects on Public Health and Safety.**

58. Minnesota's HVTL routing factors require consideration of the Project's potential effect on health and safety.<sup>65</sup> The Commission-Adopted Report previously discussed these factors, and the findings in this Supplemental Report are limited to a comparison of the Proposed Route and Route Alternative B, as developed during the Supplemental Comment Period.<sup>66</sup>

### **1. Electromagnetic Fields (EMF).**

59. The record developed during the Supplemental Comment Period does not reflect the Proposed Route or Route Alternative B will result in impacts due to EMF.<sup>67</sup>

### **2. Stray Voltage.**

60. The record developed during the Supplemental Comment Period does not reflect that the Proposed Route or Route Alternative B will result in stray voltage impacts.<sup>68</sup>

### **3. Induced Voltage.**

61. The record developed during the Supplemental Comment Period does not reflect that either route will cause impacts due to induced voltage.<sup>69</sup>

## **C. Effects on Land-Based Economies.**

62. Minnesota's HVTL routing factors require consideration of the Project's impacts to land-based economies—specifically, agriculture, forestry, tourism, and mining.<sup>70</sup> The Commission-Adopted Report previously discussed these factors, and the findings in this Supplemental Report are limited to a comparison of the Proposed Route and Route Alternative B, as developed during the Supplemental Comment Period.<sup>71</sup>

### **1. Agriculture.**

63. The record developed during the Supplemental Comment Period does not reflect that the Proposed Route or Route Alternative B will cause significant impacts to agriculture.<sup>72</sup>

64. The Proposed Route consists of 38.8 percent of prime farmland along the route, and Route Alternative B consists of 35.1 percent. Route Alternative B impacts a

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<sup>65</sup> Minn. Stat. § 216E.03, subd. 7(b)(1); Minn. R. 7850.4100(B).

<sup>66</sup> Commission-Adopted Report at ¶¶ 186-194.

<sup>67</sup> See EA Supplemental Appendix C (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)).

<sup>68</sup> See EA Supplemental Appendix C (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)).

<sup>69</sup> See EA Supplemental Appendix C (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)).

<sup>70</sup> Minn. Stat. § 216E.03, subd. 7(b)(5); Minn. R. 7850.4100(C).

<sup>71</sup> Commission-Adopted Report at ¶¶ 195-207.

<sup>72</sup> See EA Supplemental Appendix C (Oct. 28, 2025) (eDocket No. 202510-224338-01).

higher percentage of farmland of statewide importance than the Proposed Route (22.1 percent compared to 17.4 percent, respectively).<sup>73</sup>

65. During the Supplemental Comment Period, commenters expressed concern about the Proposed Route's potential agricultural impacts, particularly where the Proposed Route deviates from existing road rights-of-way.<sup>74</sup>

## **2. Forestry.**

66. The record developed during the Supplemental Comment Period does not reflect that the Proposed Route or Route Alternative B will impact forestry operations.<sup>75</sup>

## **3. Mining.**

67. The record developed during the Supplemental Comment Period does not reflect that the Proposed Route or Route Alternative B will impact mining operations.<sup>76</sup>

## **4. Tourism.**

68. The record developed during the Supplemental Comment Period does not reflect that the Proposed Route or Route Alternative B will negatively impact tourism in the Project area.

## **D. Effects on Archaeological and Historic Resources.**

69. Minnesota Rule 7850.4100, subparagraph D, requires consideration of the effects of the Project on historic and archaeological resources.<sup>77</sup> The Commission-Adopted Report previously discussed this factor, and the findings in this Supplemental Report are limited to a comparison of the Proposed Route and Route Alternative B, as developed during the Supplemental Comment Period.<sup>78</sup>

70. Once a route is selected, Applicants should be required to follow guidance from the Minnesota State Historic Preservation Office and complete the recommended Phase 1 archaeological survey on the selected route and at the Laketown Substation location.<sup>79</sup>

## **E. Effect on Natural Environment.**

71. Minnesota's HVTL routing factors require consideration of the Project's effect on the natural environment, including effects on air and water quality resources and

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<sup>73</sup> Ex. Ex. EERA-11 at 53 (EA).

<sup>74</sup> City of Carver Comments (Dec. 17, 2025) (eDocket No. [202512-225951-01](#)); Public Comments Batch 1 (Dec. 16, 2025) (eDocket No. [202512-225923-01](#)); Greg Boe Comment (Dec. 17, 2025) (eDocket No. [202512-225952-01](#)); Anthony Schuster Comment (Dec. 17, 2025) (eDocket No. [202512-225949-01](#)).

<sup>75</sup> See EA Supplemental Appendix C (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)).

<sup>76</sup> See EA Supplemental Appendix C (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)).

<sup>77</sup> See Minn. R. 7850.4100(D).

<sup>78</sup> Commission-Adopted Report at ¶¶ 208-213.

<sup>79</sup> Commission-Adopted Report at ¶ 213.

flora and fauna.<sup>80</sup> The Commission-Adopted Report previously discussed these factors, and the findings in this Supplemental Report are limited to a comparison of the Proposed Route and Route Alternative B, as developed during the Supplemental Comment Period.<sup>81</sup>

### **1. Air Quality.**

72. The record developed during the Supplemental Comment Period does not reflect that the Proposed Route or Route Alternative B will have a long-term negative impact on air quality in the Project area.<sup>82</sup>

### **2. Greenhouse Gas Emissions (GHG).**

73. The record developed during the Supplemental Comment Period does not reflect that the Proposed Route or Route Alternative B will have a significant impact on GHG emissions in the Project area.<sup>83</sup>

### **3. Climate Change.**

74. The record developed during the Supplemental Comment Period does not reflect that the Proposed Route or Route Alternative B will impact climate change.<sup>84</sup>

### **4. Geology and Topography.**

75. The record developed during the Supplemental Comment Period does not reflect that the Proposed Route or Route Alternative B will have a negative impact on geology or topography in the Project area.<sup>85</sup>

### **5. Soils.**

76. The record developed during the Supplemental Comment Period does not reflect that the Proposed Route or Route Alternative B will negatively impact soil conditions in the Project area.<sup>86</sup>

### **6. Water Quality and Resources.**

77. The Commission-Adopted Report previously discussed these factors, and the findings in this Supplemental Report are limited to a comparison of the Proposed

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<sup>80</sup> Minn. Stat. § 216E.03, subd. 7(b)(1)–(2); Minn. R. 7850.4100(E).

<sup>81</sup> See Commission-Adopted Report at ¶¶ 214-266.

<sup>82</sup> See EA Supplemental Appendix C (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)).

<sup>83</sup> See EA Supplemental Appendix C (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)).

<sup>84</sup> See EA Supplemental Appendix C at 4 (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)).

<sup>85</sup> See EA Supplemental Appendix C (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)).

<sup>86</sup> See EA Supplemental Appendix C (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)).

Route and Route Alternative B, as developed during the Supplemental Comment Period.<sup>87</sup>

(1) *Groundwater.*

78. The record developed during the Supplemental Comment Period does not reflect that the Proposed Route or Route Alternative B will negatively impact groundwater in the Project area.<sup>88</sup>

(2) *Wells.*

79. The record developed during the Supplemental Comment Period does not reflect that the Proposed Route or Route Alternative B will impact wells in the Project area.<sup>89</sup>

(3) *Surface Water.*

80. The record developed during the Supplemental Comment Period does not reflect that the Proposed Route or Route Alternative B will negatively impact surface water in the Project area.<sup>90</sup>

(4) *Wetlands.*

81. The Proposed Route would impact 0.03 acres of wetland (all of which are riverine/pond/lake wetlands), and Route Alternative B would impact 0.0 acres of wetland.<sup>91</sup> During the Supplemental Comment Period, commenters noted increased wetland crossings of the Proposed Route as compared to Route Alternative B.<sup>92</sup>

(5) *Impaired Waters.*

82. The record developed during the Supplemental Comment Period does not reflect that the Proposed Route or Route Alternative B will negatively impact impaired waters in the Project area.<sup>93</sup>

(6) *Floodplains.*

83. The record developed during the Supplemental Comment Period does not reflect that the Proposed Route or Route Alternative B will negatively impact floodplains in the Project area.<sup>94</sup>

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<sup>87</sup> Commission-Adopted Report at ¶¶ 230-256.

<sup>88</sup> See EA Supplemental Appendix C (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)).

<sup>89</sup> See EA Supplemental Appendix C (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)).

<sup>90</sup> See EA Supplemental Appendix C (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)).

<sup>91</sup> Ex. EERA-11 at 72 (EA).

<sup>92</sup> Public Comments Batch 1 (Dec. 16, 2025) (eDocket No. [202512-225923-01](#)); Greg Boe Comment (Dec. 17, 2025) (eDocket No. [202512-225952-01](#)).

<sup>93</sup> See EA Supplemental Appendix C (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)).

<sup>94</sup> See EA Supplemental Appendix C (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)).

## **7. Flora.**

84. The record developed during the Supplemental Comment Period does not reflect that the Proposed Route or Route Alternative B will negatively impact flora in the Project area.<sup>95</sup>

85. The Applicants anticipate clearing approximately five acres of trees within the 100-foot-wide right-of-way along the Proposed Route.<sup>96</sup> Route Alternative B has almost no tall-growing vegetation within the right-of-way, so tree clearing would likely be less along Route Alternative B. During the Supplemental Comment Period, comments expressed concern about tree clearing along the Proposed Route.<sup>97</sup>

## **8. Fauna.**

86. The record developed during the Supplemental Comment Period does not reflect a greater negative impact of the Proposed Route or Route Alternative B on fauna in the Project area.<sup>98</sup> USFWS noted potential impacts from either route and suggested potential mitigation strategies.<sup>99</sup>

## **F. Rare and Unique Natural Resources.**

87. Minnesota's HVTL routing factors require consideration of the Project's effect on rare and unique natural resources.<sup>100</sup> The Commission-Adopted Report previously discussed these factors, and the findings in this Supplemental Report are limited to a comparison of the Proposed Route and Route Alternative B, as developed during the Supplemental Comment Period.<sup>101</sup>

88. The record developed during the Supplemental Comment Period does not reflect that the Proposed Route or Route Alternative B will negatively impact rare and unique natural resources in the Project area.

## **G. Application of Various Design Considerations.**

89. Minnesota's HVTL routing factors require consideration of the Project's applied design options that maximize energy efficiencies, mitigate adverse environmental effects, and could accommodate expansion of the transmission system in the area.<sup>102</sup> The Commission-Adopted Report previously discussed these factors, and the findings in

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<sup>95</sup> See EA Supplemental Appendix C (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)).

<sup>96</sup> Ex. APP-2 at 6-37 (Application).

<sup>97</sup> Public Comments Batch 1 (Dec. 16, 2025) (eDocket No. [202512-225923-01](#)); Greg Boe Comment (Dec. 17, 2025) (eDocket No. [202512-225952-01](#)); Anthony Schuster Comment (Dec. 17, 2025) (eDocket No. [202512-225949-01](#)); see USFWS Comments (Dec. 15, 2025) (eDocket No. 202512-225823-01).

<sup>98</sup> See EA Supplemental Appendix C (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)).

<sup>99</sup> USFWS Comments (Dec. 15, 2025) (eDocket No. [202512-225823-01](#)).

<sup>100</sup> Minn. Stat. § 216E.03, subd. 7(b)(1); Minn. R. 7850.4100, subp. F.

<sup>101</sup> Commission-Adopted Report at ¶¶ 267-274.

<sup>102</sup> Minn. Stat. § 216E.03, subd. 7(b)(2); Minn. R. 7850.4100, subp. G.

this Supplemental Report are limited to a comparison of the Proposed Route and Route Alternative B, as developed during the Supplemental Comment Period.<sup>103</sup>

90. The Project is intended to provide 115-kV service to the Laketown Substation to meet long-term electricity planning needs.<sup>104</sup> The Project is designed to maintain necessary reliability requirements in the area and to maximize energy efficiencies and accommodate expansion capacity.<sup>105</sup>

91. POWER Engineers concluded that the Proposed Route would lessen the likelihood of outages for local customers compared to Route Alternative B. In the future, Route Alternative B could require a new greenfield breaker substation to provide system load separation, potentially nullifying the short-term cost savings from the shorter line.<sup>106</sup>

#### **H. Use of or Paralleling of Existing Rights-of-Way, Survey Lines, Natural Division Lines, and Agricultural Field Boundaries.**

92. Minnesota's HVTL routing factors require consideration of the Project's use of paralleling of existing right-of-way, survey lines, natural division lines, and agricultural field boundaries.<sup>107</sup> The Commission-Adopted Report previously discussed these factors, and the findings in this Supplemental Report are limited to a comparison of the Proposed Route and Route Alternative B, as developed during the Supplemental Comment Period.<sup>108</sup>

93. Approximately 2.4 miles or 53.5 percent of the Proposed Route will be collocated with existing rights-of-way.<sup>109</sup> In some of these areas, the road rights-of-way are also adjacent to existing aboveground MVEC distribution lines.<sup>110</sup> The Proposed Route passes through more agricultural land than Route Alternative B.<sup>111</sup>

94. Route Alternative B is approximately 94 percent collocated with existing utility or road rights-of-way.<sup>112</sup> During the Supplemental Comment Period, members of the public highlighted Route Alternative B's much higher percentage of following road rights-of-way.<sup>113</sup>

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<sup>103</sup> Commission-Adopted Report at ¶¶ 275-277.

<sup>104</sup> EA Supplemental Appendix C at 4 (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)).

<sup>105</sup> EA Supplemental Appendix C at 4 (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)).

<sup>106</sup> POWER Engineers Independent Review at 6 (Nov. 10, 2025) (eDocket No. [202511-224791-01](#)).

<sup>107</sup> Minn. Stat. § 216E.03, subd. 7(b)(9); Minn. R. 7850.4100(H).

<sup>108</sup> Commission-Adopted Report at ¶¶ 278-281.

<sup>109</sup> Ex. APP-2 at 3-2 (Application).

<sup>110</sup> Ex. APP-2 at 3-2 (Application).

<sup>111</sup> See Ex. EERA-11 (EA).

<sup>112</sup> Ex. EERA-11 at 26 (EA).

<sup>113</sup> Public Comments Batch 1 (Dec. 16, 2025) (eDocket No. [202512-225923-01](#)); Russell Schlegelmilch Comment (Dec. 17, 2025) (eDocket No. [202512-225936-01](#)); Anthony Schuster Comment (Dec. 17, 2025) (eDocket No. [202512-225949-01](#)); Patty Eiden Comment (Dec. 17, 2025) (eDocket No. [202512-225950-01](#)); Greg Boe Comment (Dec. 17, 2025) (eDocket No. [202512-225952-01](#)); City of Carver Comment (Dec. 17, 2025) (eDocket No. [202512-225951-01](#)).

## **I. Use of Existing Transportation, Pipeline, and Electrical Transmission System Rights-of-Way.**

95. Minnesota HVTL routing factors require consideration of the Project's use of existing transportation, pipeline, and electrical transmission system rights-of-way.<sup>114</sup> The Commission-Adopted Report previously discussed these factors, and the findings in this Supplemental Report are limited to a comparison of the Proposed Route and Route Alternative B, as developed during the Supplemental Comment Period.<sup>115</sup>

96. Approximately 2.4 miles or 53.5 percent of the Proposed Route will be collocated with existing rights-of-way. Route Alternative B is approximately 94 percent collocated with existing utility or road rights-of-way.<sup>116</sup>

## **J. Electrical System Reliability.**

97. Minnesota's HVTL routing factors require consideration of the Project's impact on electrical system reliability.<sup>117</sup>

98. Applicants designed the Project to accommodate availability and reliability requirements in the area and because it is proposed at 115-kV, it is sized to accommodate future expansion if electric loads increase.<sup>118</sup>

99. Analysis of the reliability of the local electrical grid as a result of the Project indicates that the Proposed Route has increased reliability benefits over Route Alternative B.<sup>119</sup>

100. The Proposed Route would site the Laketown Substation in relation to the Transmission Line to allow for the installation of a transmission bus breaker at the substation, thereby splitting both exposure and loading evenly on the system, with two MVEC distribution substations on 13 miles of exposure on one circuit, and two MVEC distribution substations on 17 miles of exposure on a second circuit.<sup>120</sup> The purpose of the breaker is to enhance transmission reliability by sectionalizing the transmission line (i.e., minimizing the number of end users who lose service in the event of an outage).<sup>121</sup>

101. In comparison, Route Alternative B would result in approximately 12 miles of exposure for one distribution substation on one circuit (4.3 MW) and 16 miles of exposure for 3 distribution substations on a second circuit (25.7 MW), if a breaker were to be installed. Thus, if Route Alternative B is selected as the permitted route, GRE will

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<sup>114</sup> Minn. Stat. § 216E.03, subd. 7(b)(8); Minn. R. 7850.4100(J).

<sup>115</sup> Commission-Adopted Report at ¶¶ 282-284.

<sup>116</sup> Ex. Ex. EERA-11 at 26 (EA).

<sup>117</sup> Minn. R. 7850.4100(K).

<sup>118</sup> EA Supplemental Appendix C at 2 (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)).

<sup>119</sup> EA Supplemental Appendix C at 10-12 (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)); POWER Engineers Independent Review at 1, 4 (Nov. 10, 2025) (eDocket No. [202511-224791-01](#)).

<sup>120</sup> Applicants' Reply Comments to New and Modified Decision Options (Sept. 2, 2025) (eDocket No. [20259-222652-01](#); [20259-222652-02](#); [20259-222652-03](#)).

<sup>121</sup> EA Supplemental Appendix C at 4 (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)).

not install the breaker at the proposed Laketown Substation site as, due to its non-centralized location relative to the transmission system and the imbalance of load, it does not provide a beneficial gain in reliability to the system.<sup>122</sup>

102. POWER Engineers confirmed the Applicants' analysis, finding that the Proposed Route would evenly split the MVEC-specific load along the line. The Proposed Route also decreases the likelihood of power outages for customers along the line.<sup>123</sup>

103. Compared to the Proposed Route, POWER Engineers determined that Route Alternative B does not offer the same reliability benefits, as existing load would not be split evenly, and adding a bus-tie circuit breaker would be less effective in improving the reliability of the transmission line due to the uneven load separation and slightly less even lengths of the east and west circuits on each side of the potential breaker, compared to the Proposed Route.<sup>124</sup>

104. POWER Engineers concluded that if Route Alternative B was selected, a new greenfield breaker station would be required in the future to achieve similar load separation and reliability results as the proposed solution. Assuming load growth in the area occurs as anticipated, and other projects do not alter the status quo, a breaker station would be needed in 10 to 15 years.<sup>125</sup>

105. The Applicants' Proposed Route would provide improved reliability by reducing transmission exposure to the existing substations in the area and providing redundant service to the new Laketown Substation. Reliability is one of multiple factors that the Commission must consider when designating a route, and GRE acknowledged the Commission may determine that other factors weigh in favor of Route Alternative B.

#### **K. Costs of Constructing, Operating, and Maintaining the Facility.**

106. Minnesota's HVTL routing factors require consideration of the Project's cost of construction, operation, and maintenance.<sup>126</sup> The Commission-Adopted Report previously discussed this factor, and the findings in this Supplemental Report are limited to a comparison of the Proposed Route and Route Alternative B, as developed during the Supplemental Comment Period.<sup>127</sup>

107. The Applicants estimate that the total cost of the Project will be approximately \$18 million using the Proposed Route.<sup>128</sup>

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<sup>122</sup> EA Supplemental Appendix C at 2 (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)); POWER Engineers Independent Review at 3 (Nov. 10, 2025) (eDocket No. [202511-224791-01](#)).

<sup>123</sup> POWER Engineers Independent Review at 2-3 (Nov. 10, 2025) (eDocket No. [202511-224791-01](#)).

<sup>124</sup> POWER Engineers Independent Review at 3 (Nov. 10, 2025) (eDocket No. [202511-224791-01](#)).

<sup>125</sup> POWER Engineers Independent Review at 4 (Nov. 10, 2025) (eDocket No. [202511-224791-01](#)).

<sup>126</sup> Minn. R. 7850.4100(L).

<sup>127</sup> Commission-Adopted Report at ¶¶ 290-294.

<sup>128</sup> Commission-Adopted Report at ¶ 291.

108. Route Alternative B is estimated to cost approximately \$15 million.<sup>129</sup> A greenfield breaker station is not proposed as part of this project, but if a greenfield breaker station were later proposed and constructed, it is estimated to cost between \$9 and \$13 million.<sup>130</sup>

**L. Adverse Human and Natural Environmental Effects that Cannot be Avoided.**

109. Minnesota’s HVTL routing factors require consideration of the adverse human and natural environmental effects that cannot be avoided.<sup>131</sup> The Commission-Adopted Report previously discussed this factor, and the Supplemental Comment Period does not reflect additional information relevant to this factor.<sup>132</sup>

**M. Irreversible and Irretrievable Commitments of Resources.**

110. Minnesota’s HVTL routing factors require consideration of the irreversible and irretrievable commitments of resources that are necessary for the Project.<sup>133</sup> The Commission-Adopted Report previously discussed this factor, and the findings in this Supplemental Report are limited to a comparison of the Proposed Route and Route Alternative B, as developed during the Supplemental Comment Period.<sup>134</sup>

111. The record developed during the Supplemental Comment Period does not reflect the Proposed Route or Route Alternative B will require a significant amount of irreversible and irretrievable commitment of resources.

**VIII. ROUTE PERMIT CONDITIONS**

112. The EA and Draft Route Permit prepared by EIP included various recommendations and potential route permit conditions related to the Project.<sup>135</sup> The Commission-Adopted Report discusses the Draft Route Permit and various recommendations to the Draft Route Permit.<sup>136</sup> The October 2025 Order adopts these findings.<sup>137</sup>

113. The Applicants indicate they do not support one of the conditions identified in the Commission-Adopted Report. Specifically, the Commission-Adopted Report requires “Applicants conduct only winter tree-clearing for the Project.”<sup>138</sup> This condition is

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<sup>129</sup> Commission-Adopted Report at ¶ 292.

<sup>130</sup> EA Supplemental Appendix C at 14-15, (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)); POWER Engineers Independent Review at 5, Appendix B (Nov. 10, 2025) (eDocket No. [202511-224791-01](#)).

<sup>131</sup> Minn. Stat. § 216E.03, subd. 7(b)(6); Minn. R. 7850.4100(M).

<sup>132</sup> Commission-Adopted Report at ¶¶ 295-296.

<sup>133</sup> Minn. Stat. § 216E.03, subd. 7(b)(11); Minn. R. 7850.4100(N).

<sup>134</sup> Commission-Adopted Report at ¶¶ 297-298.

<sup>135</sup> Ex. EERA-11 at Appendix B (Draft Route Permit); Ex. APP-19 at 9-10 (Direct Testimony of M. Swenson).

<sup>136</sup> Commission-Adopted Report at ¶¶ 306-311.

<sup>137</sup> October 2025 Order at Order ¶ 1.

<sup>138</sup> Commission-Adopted Report at ¶ 310.

outside the scope of the supplemental process and is, in any event, supported by the record.

## **IX. NOTICE**

114. Commission staff issued the notice of comment period on the independent consultant report and for additional record development on November 17, 2025.<sup>139</sup>

115. Applicants also sent correspondence to all landowners along the Proposed Route and Route Alternative B, as well as local government units, to inform them of the supplemental process and encourage them to participate in the related comment period and to contact Great River Energy with any questions.<sup>140</sup>

## **X. COMPLETENESS OF EA**

116. The October 2025 Order also concludes that the EA and the record created at the public hearing address the issues identified in the Scoping Decision, except as to the reliability of Route Alternative B as compared to the Applicants' Proposed Route. The October 2025 Order directed the provision of this additional information.<sup>141</sup>

117. Supplemental Appendix C to the EA was filed on October 28, 2025. This filing adequately addresses the October 2025 Order and the Commission's request for additional information on the potential reliability issues of Route Alternative B compared to the Applicants' Proposed Route.<sup>142</sup>

118. The evidence in the record demonstrates that the Supplemental Appendix C to the EA adequately addresses the information requested in the October 2025 Order.<sup>143</sup>

Based on the foregoing Findings of Fact and the record in this proceeding, the Judge makes the following:

### **CONCLUSIONS OF LAW**

1. Any of the forgoing Findings of Fact more properly designated as Conclusions of Law are hereby adopted as such.

2. EIP has conducted an appropriate EA of the Project for purposes of this proceeding, which satisfies Minn. R. 7850.3700 and 7850.3900. Supplemental Appendix C to the EA provides further information in response to the Commission's October 2025 Order. Specifically, the EA, the record, and Supplemental Appendix C address the issues identified in the Scoping Decision and the October 2025 Order to a

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<sup>139</sup> Notice of Comment Period on Independent Consultant Report and for Additional Record Development (Nov. 17, 2025) (eDocket No. [202511-224978-01](#)).

<sup>140</sup> Applicants' Initial Comments at 2-3 (Dec. 16, 2025) (eDocket No. [202512-225903-01](#)).

<sup>141</sup> October 2025 Order at Order ¶ 2.

<sup>142</sup> See EA Supplemental Appendix C (Oct. 28, 2025) (eDocket No. [202510-224338-01](#)).

<sup>143</sup> Ex. EERA-6 (EA Scoping Decision).

reasonable extent considering the availability of information, and the EA includes the items required by Minn. R. 7850.3700, subp. 4, and was prepared in compliance with the procedures in Minn. R. 7850.3700.

3. Applicants gave notice of the supplemental proceeding consistent with the October 2025 Order.

4. The evidence in the record demonstrates that Route Alternative B best satisfies the Route Permit factors set forth in Minn. Stat. § 216E.04, subd. 8 (referencing Minn. Stat. § 216E.03, subd. 7), and Minn. R. 7850.4100.

5. There is no feasible and prudent alternative to the construction of the Project, and the Project is consistent with and reasonably required for the promotion of public health and welfare in light of the state's concern for the protection of its air, water, land, and other natural resources as expressed in the Minnesota Environmental Rights Act.

6. The evidence in the record demonstrates Route Alternative B is the best route for the Project based upon consideration of all required factors and particularly because of its maximization of existing right-of-way and lesser overall impact upon stakeholders.

7. Any of the foregoing Conclusions of Law which are more properly designated Findings of Fact are hereby adopted as such.

Based upon these Conclusions, the Judge makes the following:

### **RECOMMENDATION**

The Commission should issue a Route Permit for Route Alternative B with an alignment along the north side of Augusta Road to Great River Energy and Minnesota Valley Electric Cooperative to construct and operate the Project and associated facilities in Carver County.

Dated: January 28, 2026



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KIMBERLY MIDDENDORF  
Administrative Law Judge

## NOTICE

Notice is hereby given that exceptions to this Report, if any, by any party adversely affected must be filed under the time frames established in the Commission's rules of practice and procedure, Minn. R. 7829.1275, .2700 (2023), unless otherwise directed by the Commission. Exceptions should be specific and stated and numbered separately. Oral argument before a majority of the Commission will be permitted pursuant to Minn. R. 7829.2700, subp. 3. The Commission will make the final determination of the matter after the expiration of the period for filing exceptions, or after oral argument, if an oral argument is held.

The Commission may, at its own discretion, accept, modify, or reject the Administrative Law Judge's recommendations. The recommendations of the Administrative Law Judge have no legal effect unless expressly adopted by the Commission as its final order.

January 28, 2026

See Attached Service List

**Re: *In the Matter of the Application of Great River Energy for a Route Permit Application for the Laketown 115-kV Transmission Line in Carver County, Minnesota***

**CAH 21-2500-40445  
MPUC TL-24-132**

To All Persons on the Attached Service List:

Enclosed and served upon you is the Administrative Law Judge's **SUPPLEMENTAL FINDINGS OF FACT, CONCLUSIONS OF LAW, AND RECOMMENDATION** in the above-entitled matter. The Court of Administrative Hearings' file in this matter is now closed.

If you have any questions, please contact me at (651) 361-7857, [nichole.sletten@state.mn.us](mailto:nichole.sletten@state.mn.us), or via facsimile at (651) 539-0310.

Sincerely,



NICHOLE SLETTEN  
Legal Assistant

Enclosure

cc: Docket Coordinator

STATE OF MINNESOTA  
COURT OF ADMINISTRATIVE HEARINGS  
PO BOX 64620  
600 NORTH ROBERT STREET  
ST. PAUL, MINNESOTA 55164

**CERTIFICATE OF SERVICE**

In the Matter of the Application of Great River Energy for a Route Permit Application for the Laketown 115-kV Transmission Line in Carver County, Minnesota	CAH Docket No.: 21-2500-40445 MPUC TL-24-132
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On January 28, 2026, a true and correct copy of the **SUPPLEMENTAL FINDINGS OF FACT, CONCLUSIONS OF LAW, AND RECOMMENDATION** was served by eService, and United States mail, (in the manner indicated on the attached service list) to the following individuals:

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Katherine	Arnold	katherine.arnold@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		No	Official CC Service List OAH
2	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission		Electronic Service		No	Official CC Service List OAH
3	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	Official CC Service List OAH
4	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		No	Official CC Service List OAH
5	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	Official CC Service List OAH
6	Chad	Graham	chad.graham@state.mn.us		Public Utilities Commission	171 7th Place E Suite 350 Saint Paul MN, 55101 United States	Electronic Service		No	Official CC Service List OAH
7	Jacques	Harvieux	jacques.harvieux@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 Saint Paul MN, 55101-2147 United States	Electronic Service		No	Official CC Service List OAH
8	Logan	Hicks	logan.m.hicks@state.mn.us		Department of Commerce	85 7th Place East Suite 280 Saint Paul MN, 55101 United States	Electronic Service		No	Official CC Service List OAH
9	Spencer	Howe	spencerh@mvec.net	Minnesota Valley Electric Cooperative		125 Minnesota Valley Electric Dr Jordan MN, 55352 United States	Electronic Service		No	Official CC Service List OAH
10	Breann	Jurek	bjurek@fredlaw.com	Fredrikson & Byron PA		60 S Sixth St Ste 1500 Minneapolis MN, 55402 United States	Electronic Service		No	Official CC Service List OAH
11	Molly	Leisen	mleisen@fredlaw.com	Fredrikson & Byron P.A.		60 South Sixth Street Suite 1500 Minneapolis MN, 55402 United States	Electronic Service		No	Official CC Service List OAH
12	Sam	Lobby	sam.lobby@state.mn.us		Public Utilities Commission	350 Metro Square Building 121 7th Place East St. Paul MN, 55101 United States	Electronic Service		No	Official CC Service List OAH
13	Kimberly	Middendorf	kimberly.middendorf@state.mn.us		Office of Administrative Hearings	PO Box 64620 600 Robert St N	Electronic Service		Yes	Official CC Service List OAH

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Saint Paul MN, 55164- 0620 United States				
14	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		No	Official CC Service List OAH
15	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	Official CC Service List OAH
16	Michael	Swenson	mswenson@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	Official CC Service List OAH
17	Haley	Waller Pitts	hwallerpitts@fredlaw.com	Fredrikson & Byron, P.A.		60 S Sixth St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	Official CC Service List OAH