

Staff Briefing Papers

Meeting Date February 26, 2026 **ALJ:** Kimberly Middendorf **Agenda Item 3****

Company Great River Energy and Minnesota Valley Electric Co-op

Docket No. ET-2/TL-24-132

In the Matter of the Application for a Route Permit for a 115-kV Laketown Transmission Line and Associated Facilities Project in Carver County, Minnesota.

- Issues**
- Should the Commission adopt the supplemental administrative law judge’s findings of fact, conclusions of law, and recommendation?
 - Should the Commission determine that the Appendix C supplement to the Environmental Assessment adequately addresses the October 2025 *Order Adopting Administrative Law Judge Report as Modified, Requiring Additional Record Development, and Remanding For Further Proceedings?*
 - Should the Commission grant a route permit for GRE’s Laketown transmission Project?
 - Are there other issues or concerns related to this matter?

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 Relevant Documents	Date
PUC – <i>Order Adopting ALJ Report as Modified, Requiring Additional Record Development, and Remanding for Further Proceedings</i>	10/02/2025
GRE – Proposed Independent Selection and Scope	10/16/2025
PUC – Letter – Independent Consultant	10/20/2025
CAH – Third Prehearing Order Establishing Procedural Schedule	10/22/2025
PUC EIP – Laketown EA Appendix C (3 parts)	10/28/2025
POWER Engineers Report – Route reliability Assessment	11/10/2025

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The attached materials are work papers of the Commission Staff. They are intended for use by the Public Utilities Commission and are based upon information already in the record unless noted otherwise.

✓ Relevant Documents	Date
PUC – Notice of Comment Period on Independent Consultant Report and for Additional Record Development	11/17/2025
City of Victoria – Public Comment	12/08/2025
Xcel Energy – Comments on GRE’s Route Permit for Laketown	12/15/2025
US Fish and Wildlife Service – Public Comments	12/15/2025
Public Comments – 17 public comments received	12/15-17/2025
GRE – Initial Comments	12/16/2025
GRE – Reply Comments	12/23/2025
Minnesota Valley Electric Cooperative – Reply Comments	12/23/2025
Public Comment – Patty Eiden, received outside comment period	12/30/2025
GRE – Proposed Findings of Fact, Conclusions of Law, and Recommendations	12/30/2025
PUC EIP Reply Comments – Response to Supplemental Findings	01/07/2026
Public Comment – Jack Worm, received outside comment period	01/07/2026
CAH – Supplemental Findings of Fact, Conclusions of Law, and Recommendation	01/28/2026
PUC EIP – Letter, Exceptions to Supplemental ALJ Report	02/03/2026
GRE – Letter, Exceptions to Supplemental ALJ Report	02/05/2026

STATEMENT OF THE ISSUES

- Should the Commission adopt the supplemental administrative law judge’s findings of fact, conclusions of law, and recommendation?
- Should the Commission determine that the Appendix C supplement to the Environmental Assessment adequately addresses the October 2025 *Order Adopting Administrative Law Judge Report as Modified, Requiring Additional Record Development, and Remanding For Further Proceedings*?
- Should the Commission grant a route permit for GRE’s Laketown transmission Project?
- Are there other issues or concerns related to this matter?

PROJECT DESCRIPTION

The Laketown 115-kilovolt (kV) high voltage transmission line (HVTL) project in Carver County, Minnesota is proposed by Great River Energy (GRE) and Minnesota Valley Electric Cooperative (MVEC)¹. The project, as proposed in the Applicant Proposed route (APR), includes construction of approximately 4.3 miles of new 115-kV transmission line and a new substation (Laketown substation). The Laketown project would be located between the existing GRE 115-kV MV-VTT transmission line and the proposed substation owned by MVEC and located within Laketown Township. An alternative to the APR, Route Alternative B (RA-B), would also include the construction of a new 115-kV transmission line and a new substation in Laketown Township but would instead follow mostly existing ROW and connect with an Xcel owned 115-kV transmission line. Both routes can be seen on the maps below.

On September 4, 2025, this matter came before the Minnesota Public Utilities Commission (Commission) for a route permit decision. The Commission determined that the record necessary for making a permit decision was incomplete and remanded the matter to the Court of Administrative Hearings for further record development. To this end, and in accordance with the Commission’s October 2, 2025, Order²:

- The Applicants supplemented their reliability and cost analysis contained in Appendix C of the environmental assessment (EA) for the project.
- An independent engineering consultant, Power Engineers, Inc, (Independent Consultant) submitted a reliability and cost analysis of the Applicant Proposed Route (APR) and Route Alternative B (RA-B).
- An additional public comment period was established to allow, among others, local units

¹ Applicants – Initial Filing of Application (21 parts) (08/19/2024): [20248-209604-02](#)

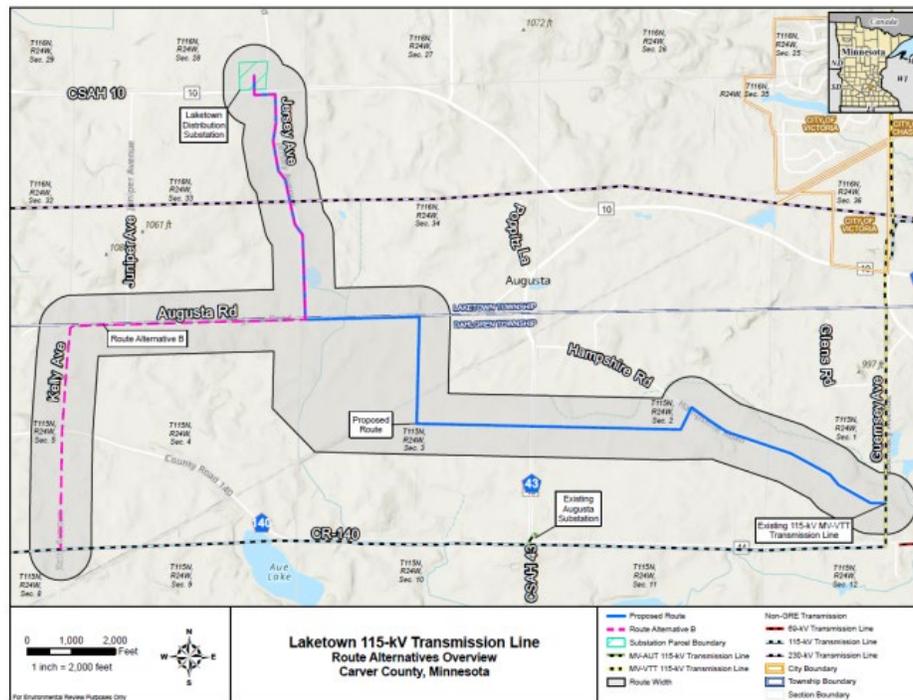
² PUC – October 2, 2025 Order (10/02/2025): [202510-223519-01](#)

of government and landowners who have property within and along the proposed routes to provide additional comments on the independent consultant's report, the supplement to the Environmental Assessment and the routing factors for permitting either the APR or alternative RA-B.

The Applicants submitted a supplement to Appendix C of the EA to the PUC EIP³. The Applicants also retained an Independent Consultant to perform a reliability and cost analysis, which was submitted into the record on November 10, 2025⁴. Following the filing of the Independent Consultant's report, the Commission filed a Notice of Comment on the Independent Consultant's Report and for Additional Record Development⁵. During the comment period, many members of the public submitted comments. Most of the comments indicated support for RA-B. On December 23, 2025, the Applicants, GRE and MVEC, respectively, filed separate comments into the docket indicating they had changed their preference from the APR to RA-B.

PROJECT OVERVIEW MAPS⁶

Map 1



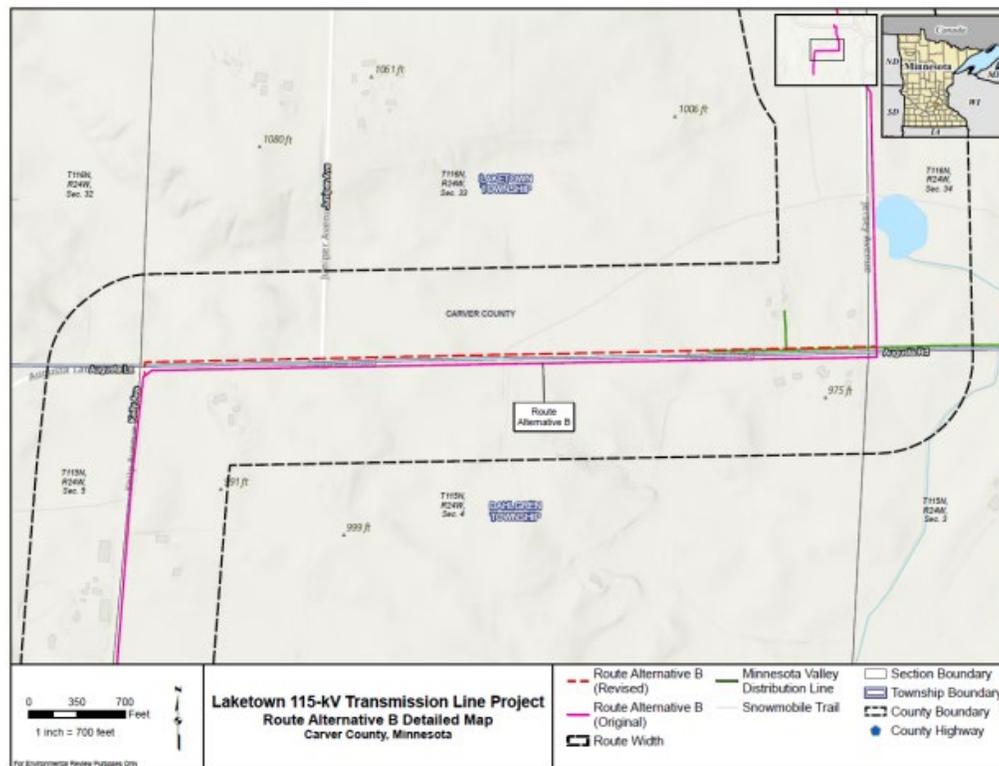
³ PUC EIP – Laketown Environmental Assessment Appendix C Supplement (10/28/2025): [202510-224363-01](#)

⁴ POWER Engineers Report – Independent Reliability and Cost Review (11/10/2025): [202511-224791-01](#)

⁵ PUC – Notice of Comment Period on Independent Consultant Report and for Additional Record Development (11/17/2025): [202511-224978-01](#)

⁶ PUC – Notice of Comment Period on Independent Consultant Report and for Additional Record Development (11/17/2025): [202511-224978-01](#)

Map 2



STATUTES AND RULES

Route Permit

Under Minn. Stat. § 216E.03, subd. 2 the Commission must issue a route permit before a high voltage transmission line may be constructed in Minnesota. The proposed project requires a route permit because it meets the definition of a high-voltage transmission line, as it is a transmission line with a capacity greater than 100kV and a length greater than 1,500 feet.

In deciding whether to issue a permit for a high-voltage transmission line the Commission must consider the factors under Minn. R. 7850.4100.

Environmental Document

Under Minn. Stat. § 216E.04 *Alternative Review of Applications*, the Commissioner of the Department of Commerce is required to prepare an environmental assessment (EA) on proposed high-voltage transmission lines on behalf of the Commission. The environmental assessment must contain information on the potential human and environmental impacts of a proposed project and of alternative sites or routes considered and must address mitigation measures for identified impacts. PUC EIP,⁷ developed and filed an environmental assessment of the project on April 8, 2025.

⁷ Formerly the Department of Commerce Energy Environmental Review and Analysis Unit.

PROCEDURAL HISTORY

On October 2, 2025, the Commission issued its *Order Adopting Administrative Law Judge Report as Modified, Requiring Additional Record Development, and Remanding For Further Proceedings*.

On October 16, 2025, the Applicants filed their proposed scope for the independent engineers report on route reliability.

On October 20, 2025, the Commission's Executive Secretary issued a letter approving the scope of the independent engineers' report.

On October 22, 2025, the Administrative Law Judge (ALJ) submitted her Third Prehearing Order establishing the procedural schedule for the remanded proceeding on the Project.

On October 28, 2025, PUC EIP filed the additional information provided by the Applicants into Appendix C of the Environmental Assessment.

On November 10, 2025, The Independent Consultant filed their report on reliability and cost review of the APR and RA-B route alternatives.

On November 17, 2025, the Commission issued a Notice of Comment Period on Independent Consultant Report and for Additional Record Development, which solicited comments from members of the public impacted by the proposed alternative routes.

On December 8, 2025, the City of Victoria filed their comments stating they are not opposed to the Applicant Proposed Route or RA-B.

On December 15, 2025, Xcel Energy, as required by the October 2025 Order filed comments into the record regarding the reliability of Route Alternative B.

On December 15, 2025, the US Fish and Wildlife Service filed comments regarding their review of the Project.

On December 16, the Applicants submitted their initial comments.

Between December 15 and December 18, 2025, 17 public comments were filed into the record with the vast majority of commenters supporting RA-B. Comments were received from: Bruce Muelenrs, David Sorrentino, Deb Erickson, Jeff Thompson, Jim Holasek, Peter Nordang, Carla Gestach, Stephen Gestach, Trudy Vogel, Greg Boe, the City of Carver, Patty Eiden, Anthony Shuster, Jo Eiden, Russell Schlegelmilch, and Don Schlegelmilch.

On December 23, 2025, both GRE and MVEC filed comments into the record indicating they had

changed their preferred route to RA-B based on public comments.

On December 30, 2025, Patty Eiden filed comments into the record outside of the comment period.

On December 30, 2025, the Applicants filed their proposed supplemental findings of fact, conclusions of law, and recommendations.

On January 7, 2026, PUC EIP filed their response to the Applicants proposed findings.

Jack Worm filed a public comment into the record.

On January 28, 2026, the ALJ filed her Supplemental Findings of Fact, Conclusions of Law, and Recommendation.

On February 3, 2026, PUC EIP filed their Exceptions to the Supplemental ALJ Report.

On February 5, 2026, the Applicants filed their Exceptions to the Supplemental ALJ Report.

PUBLIC COMMENTS

On November 17, 2025, the Commission issued a Notice of Comment Period on Independent Consultant Report and For Additional Record Development. The initial comment period closed on December 16, 2025, and the reply comment period closed on December 23, 2025.

On December 8, 2025⁸, the City of Victoria filed comments stating that they do not oppose either the APR or RA-B, as it has minimal impacts on the City's 2040 Comprehensive Plan.

On December 15, 2025⁹, Xcel Energy filed comments into the record stating that they reviewed both the APR and RA-B and that they have no reliability concerns regarding either route. They further stated that from their perspective, there is no practical difference in cost between the two routes because of how MISO allocates costs, and either route would require about \$300,000 for the Applicants to connect to the grid.

Also on December 15, 2025¹⁰, the US Fish and Wildlife Service submitted comments in accordance with the Endangered Species Act, the Migratory Bird Treaty Act, and the Bald and golden Eagle Protection Act. The letter makes recommendations about how the Applicants can comply with the above stated laws for the Laketown Transmission Line.

⁸ City of Victoria (12/08/2025) – Comments: [202512-225603-01](#)

⁹ Xcel Energy (12/15/2025) – Comments: [202512-225858-01](#)

¹⁰ US Fish and Wildlife Service (12/15/2025) – Comments: [202512-225823-01](#)

Beginning on December 16, 2025, through December 18, 2025, there were 17 public comments submitted¹¹, with the vast majority expressing support for RA-B. Each of those comments is briefly summarized below:

- Bruce Meuleners – Requested that the line follow existing roadways and not go through farmland.
- David Sorrentino – Stated that he lives on Jersey Avenue and is concerned about property values decreasing due to the 90’ poles along Jersey Avenue and visual and health impacts.
- Deb Erickson – Expressed support for RA-B because she did not want to see the line cut through farmland or wildlife areas.
- Jeff Thompson, Dahlgren Township Supervisor – On behalf of Dahlgren Township, the Township Supervisor expressed support for RA-B, which does not establish new Right-of-Way (ROW) across private land.
- Jim Holasek – Owner and President of Holasek Land Management, stated his land would be impacted by the APR, and expressed support for RA-B. He noted that the EA stated that RA-B stays within existing ROW and reduces the amount of land leased or sold to the Applicant. He commented on the reliability of the different routes from his perspective. He also stated that if RA-B is chosen, he believes the line should go on the North side of Augusta Road because it would do the least amount of damage to land and impact fewer landowners. He further expressed that he does not have faith in GRE to work cooperatively with landowners.
- Peter Nordang – Stated that he has professional experience with highway/industrial construction, has carefully reviewed the record, and is of the opinion that RA-B would be the most ideal route for the Laketown Project.
- Carla Gestach – Stated that she is concerned about the APR because it would cross through productive farm fields, and she prefers that the transmission line be routed along existing ROW’s.
- Trudy Vogel – Stated her opposition to the APR because it would break up farmland. She stated that if the line goes along existing ROW it will be more accessible for repairs and therefore more reliable. She expressed support for RA-B and that she prefers that the transmission line go on the North side of the road.
- Tim Eiden – Expressed extreme frustration with the Applicant and does not trust them. He requested that both the APR and RA-B be denied and that they start over to “do it right” and go along the new CR 10.
- Greg Boe – Expressed support for RA-B and stated that he does not think the APR is appropriate because it cuts through farmland.
- City of Carver – The City of Carver continued to oppose the APR and expressed that if the Applicants approached them early on, similar to coordination efforts with the City of

¹¹ Public Comments: (Bruce Meuleners, David Sorrentino, Deb Erickson, Jeff Thompson, Jim Holasek, Peter Nordang, Carla Gestach, Stephen Gestach, Trudy Vogel) [202512-225923-01](#); Greg Boe [202512-225952-01](#); City of Carver [202512-225951-01](#); Patty Eiden [202512-225950-01](#); Anthony Shuster [202512-225949-01](#); Jo Eiden [202512-225940-01](#); Russell Schlegelmilch [202512-225936-01](#); Don Schlegelmilch [202512-225996-01](#)

Victoria, RA-B would have been selected by the Applicants as their preferred route. The City stated that they understood the cost to the Applicant would be greater following RA-B, but suggested that the APR would have similarly significant impacts on the City of Carver.

- Patty Eiden – Expressed opposition to the APR that would go through her farmland and encouraged the Commission to select a route that goes along existing roadways.
- Anthony Shuster – Expressed opposition to the APR stating that there are already two 115-kV lines in the area and questioned why a third would be needed. He stated his support for RA-B for several reasons, including that RA-B follows existing ROW.
- Jo Eiden – Stated that she is extremely nervous about a power line being routed along Kelly Avenue, where she lives, and hopes a route that includes Kelly Avenue (RA-B) isn't chosen.
- Russel Schlegelmilch – Stated that he does not want the APR to be chosen since it impacts his land and expressed support for RA-B because it has fewer impacts to landowners.
- Don Schlegelmilch – Expressed opposition to the APR and support for RA-B because it would not break up farmland and has fewer impacts to residents by following existing ROW.

On December 23, 2025, both GRE and MVEC¹² separately submitted comments stating that, based on public input, they now prefer route alternative RA-B.

On December 30, 2025¹³, Patty Eiden filed comments outside the comment period suggesting a new proposed route for consideration and stating that she would prefer to see the line routed North along Juniper Avenue instead of going North on Jersey Avenue. She further explained it would eliminate the need for large corner poles and would not impact the Lindgren and Greg Eiden homes. She requested that if RA-B is chosen, the Commission modify it as requested.

On January 7, 2026¹⁴, Jack Worm filed public comments outside the comment period stating that he is opposed to the APR, and that he would prefer to see the line go on Kelly Avenue to Augusta Road, then North on Juniper to County Road 10, then east to the new Laketown Substation.

ALJ REPORT

In its October 2, 2025, Order, the Commission requested that an ALJ preside over the public hearings and provide a Report with findings of fact, conclusions of law, and recommendations. The matter came before the Commission on September 4, 2025, where it was decided that the record lacked the information necessary to make a final decision and the project was remanded

¹² Applicants – Reply Comments (12/23/2025): [202512-226177-01](#); [202512-226136-01](#)

¹³ Patty Eiden – Comments (12/30/2025): [202512-226345-01](#)

¹⁴ Jack Worm – Comments (01/07/2026): [20261-226594-01](#)

back to the Court of Administrative Hearings for additional record development. The issues related to the remand were set out in a PUC Order on October 2, 2025. On January 28, 2026¹⁵, Judge Middendorf filed her supplemental findings of fact, conclusions of law, and recommendations into the record. The Report contains 118 findings of fact, 7 conclusions of law, and a recommendation.

Route Permit Conditions

The ALJ indicated that “The EA and Draft Route Permit prepared by EIP included various recommendations and potential route permit conditions related to the Project. The Commission-Adopted ALJ Report discussed the Draft Route Permit and various recommendations for the Final Route Permit. The October 2025 Order adopted those findings.” The Commission-Adopted Report also noted that the Applicant opposed Special Condition 6.3 Vegetation Removal (Winter Tree Clearing) in the route permit.

Notice

The Supplemental ALJ Report indicated that Commission staff issued a Notice of Comment Period on November 17, 2025, to solicit comments and provide additional record development. The Report also stated that the Applicants sent correspondence to all landowners along the APR and RA-B, as well as to local government units.

Completeness of Environmental Assessment

The Supplemental ALJ Report stated that “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.” The Report goes on to state that the PUC EIP filing of Supplemental Appendix C to the EA adequately addresses the October 2025 Order.

Conclusions of Law

The ALJ stated that:

- PUC EIP appropriately conducted the EA for the Project in satisfaction of Minn. R. 7850.3700 and 7850.3900, and that the Supplemental Appendix C added to the EA addresses the Commission’s October 2025 Order.
- Applicants properly provided notice of the supplemental proceeding in accordance with the October 2025 Order.
- 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.
- There is no feasible or prudent alternative to the construction of the Project and the Project is consistent with and reasonably required for promotion and protection of the public and the State’s environmental health and welfare.

¹⁵ CAH – ALJ Report (01/28/2026): [20261-227517-01](#)

- The record demonstrates the best route for the Project is Route Alternative B because it maximizes existing ROW and lessens impacts on local landowners.

Recommendation

The ALJ stated in her report that “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.”

EXCEPTIONS TO THE ALJ REPORT

PUC EIP

On February 3rd, 2026¹⁶, PUC EIP filed their Exceptions to Supplemental ALJ Report and stated that they did not have any exceptions to the Report.

Applicants

On February 5, 2026¹⁷, the Applicants filed their Supplemental Findings and stated that they did not have any exceptions to the Supplemental Report.

STAFF ANALYSIS

Based on the supplemental record development that was completed in accordance with the Commission’s October 2025 Order, staff recommend that the Commission find that the supplemented record addresses questions of reliability and cost between the Applicant Proposed Route and Route Alternative B, and issue a permit to the applicants for Route Alternative B.

The following issues are before the Commission:

- Whether to adopt the ALJ Report.
- Whether the supplement to the EA is adequate.
- Whether to grant a route permit for the Laketown Project and identify a route and approve any additional permit conditions, as necessary.

Based on information in the route permit application, the analysis performed by the Independent Consultant, the supplemented EA, public comments, the applicant’s response, and the supplemental ALJ Report, and other evidence in the record, staff provides this discussion.

¹⁶ PUC EIP – Exceptions (02/03/2026): [20262-227797-01](#)

¹⁷ Applicants – Exceptions (02/05/2025): [20262-227888-01](#)

ALJ Report

Staff agrees with the findings, conclusions, and recommendations reached by the ALJ in her supplemental Report. Staff finds that the supplemental ALJ Report is a sound, comprehensive, and common sense ruling that is reflective of the case record and supplemental information developed in the route permit proceeding. The supplemental ALJ Report documents that the procedural requirements were followed and provides findings of fact for each of the decision criteria that must be met for a route permit for a high-voltage transmission line.

Public participation was of critical importance in determining a feasible route for the Project. Members of the public helped to initially identify that the City of Carver had not meaningfully participated in the development of potential routes. Once the matter was remanded back to the Court of Administrative Hearings, there was substantial public input during the subsequent comment period stating a near unanimous preference for Route Alternative B. The level of public involvement in this proceeding helped to identify critical local issues and resulted in a better route proposal for the area.

Concerning Route Permit Conditions, the Supplemental ALJ Report states that “The EA and Draft Route Permit prepared by EIP included various recommendations and potential route permit conditions related to the Project. The Commission-Adopted Report discusses the Draft Route Permit and various recommendations to the Draft Route Permit. The October 2025 Order adopts these findings.”

Route Selection

Staff agrees with the recommendation of the ALJ that alternative route RA-B is consistent with the Commission’s routing criteria and best balances and minimizes impacts overall.

Exceptions to the Supplemental ALJ Report

Neither the applicant nor PUC EIP proposed any exceptions to the supplemental ALJ Report.

Additional Route Permit Conditions

Staff has proposed the following new permit condition for inclusion in the attached proposed permit:

6.7 – Tree Replacement Plan

The Permittee in coordination with impacted landowners, the DNR and the affected counties shall develop a plan to replace any trees that are removed for construction of the project by planting new seedling or sapling trees first on impacted landowner property or if that's not practical in the affected counties near the project area, and file the plan with the Commission at least 14 days before the pre-construction meeting. At least 45 days prior to the preconstruction

meeting, the Applicant shall make a tree replacement plan compliance filing including an estimate of costs for that construction segment.

The Tree Replacement Plan may include an alternative proposal to fund tree replacements by and through DNR Forestry Programs or other similar public programs. Plantings shall be prioritized in counties through which the line crosses.

DECISION OPTIONS

ALJ Report

1. Adopt the ALJ's Supplemental Findings of Fact, Conclusions of Law, and Recommendations. (ALJ, Staff)

Or

2. Adopt the Supplemental ALJ Report with the following modifications.

Or

3. Do not adopt the Supplemental ALJ Report, and require further record development.

Environmental Assessment

4. Find that the supplement to Appendix C of the EA sufficiently addresses the deficiencies identified in the Commission's October 2, 2025 Order, and that the supplemented EA and the record address the issues identified in the Scoping Decision. (ALJ, Staff)

Or

5. Find that the supplement to Appendix C of the EA does not sufficiently address the deficiencies identified in the Commission's October 2, 2025 Order and must be further supplemented.

Route Permit

6. Issue a Route Permit to Great River Energy authorizing Route Alternative B as recommended by the ALJ for the Laketown 115-kV Transmission Line Project with the conditions recommended by the ALJ. (ALJ, Applicant, Staff)
 - a. Exclude the ALJ recommended condition related to Winter Tree Clearing. (Applicant)
 - i. "The Permittee shall disturb or clear vegetation within the Designated Site only from November 1 to April 1 to the extent necessary to assure the safe construction, operation, and maintenance of the Project. The Permittee shall minimize the number of trees removed within the Designated Site specifically preserving to the maximum extent practicable windbreaks, shelterbelts, and living snow fences."
 - b. Add Staff Recommended Special Condition 6.7 – Tree Replacement Plan. (Staff)
 - i. "The Permittee in coordination with impacted landowners, the DNR and

the affected counties shall develop a plan to replace any trees that are removed for construction of the project by planting new seedling or sapling trees first on impacted landowner property or if that's not practical in the affected counties near the project area, and file the plan with the Commission at least 14 days before the pre-construction meeting. At least 45 days prior to the preconstruction meeting, the Applicant shall make a tree replacement plan compliance filing including an estimate of costs for that construction segment.

The Tree Replacement Plan may include an alternative proposal to fund tree replacements by and through DNR Forestry Programs or other similar public programs. Plantings shall be prioritized in counties through which the line crosses.”

7. Deny a route permit for the Laketown 115-kV Transmission Line Project.

Administrative

8. Delegate authority to the Executive Secretary to modify the Findings of Fact and Conclusions of Law and Route Permit to correct any typographic and formatting errors, to reflect recent changes in energy infrastructure permitting law as applicable, and ensure consistency with the Commission’s order. (Staff)

STATE OF MINNESOTA PUBLIC UTILITIES COMMISSION

**ROUTE PERMIT FOR
LAKETOWN 115 KV TRANSMISSION LINE PROJECT**

A HIGH-VOLTAGE TRANSMISSION LINE AND ASSOCIATED FACILITIES

**IN
CARVER COUNTY**

**ISSUED TO
GREAT RIVER ENERGY AND
MINNESOTA VALLEY ELECTRIC COOPERATIVE**

PUC DOCKET NO. ET2/TL-24-132

In accordance with the requirements of Minnesota Statutes Chapter 216E and Minnesota Rules Chapter 7850 this route permit is hereby issued to:

[Permittee]

Great River Energy is authorized by this route permit to construct and operate the 115 kV Transmission Line Project.

The high-voltage transmission line shall be constructed within the route identified in this route permit and in compliance with the conditions specified in this route permit.

Approved and adopted this ____ day of [Month, Year]

BY ORDER OF THE COMMISSION

Will Seuffert,
Executive Secretary

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ATTACHMENTS

Attachment 1 – Complaint Handling Procedures for Permitted Energy Facilities

Attachment 2 – Compliance Filing Procedures for Permitted Energy Facilities

Attachment 3 – Route Permit Maps

1 ROUTE PERMIT

The Minnesota Public Utilities Commission (Commission) hereby issues this route permit to Great River Energy (Permittee) pursuant to Minnesota Statutes Chapter 216E and Minnesota Rules Chapter 7850. This route permit authorizes the Permittee to construct and operate the Laketown 115 Kilovolt kV Transmission Line Project, henceforth known as Transmission Facility). The high-voltage transmission line shall be constructed within the route identified in this route permit and in compliance with the conditions specified in this route permit.

1.1 Pre-emption

Pursuant to Minn. Stat. § 216E.10, this route permit shall be the sole route approval required for construction of the transmission facilities and this route permit shall supersede and preempt all zoning, building, or land use rules, regulations, or ordinances promulgated by regional, county, local and special purpose governments.

2 TRANSMISSION FACILITY DESCRIPTION

[Provide a description of the Transmission Facility as authorized by the Commission]

The Transmission Facility is located in the following:

County	Township Name	Township	Range	Section
Carver	Laketown	116	24	

2.1 Structures

The structures will consist primarily of direct-embedded steel monopoles, 70 to 95 feet above ground and placed 300 to 450 feet apart. Direct-embed steel structures or steel structures on concrete foundations would be approximately 30 inches in diameter.

Steel structures on concrete foundations may be needed for angled structures; the size of these structures is dependent on the tension on the line, and/or the angle of deflection the structure location causes on the Transmission Line. Specific sizing of these structures will be determined after a route permit is issued and detailed engineering design is initiated.

Multi-pole (e.g., 3-pole deadend) and/or H-frame structures are designed in a horizontal configuration, which maintains the transmission line conductors parallel to the ground. Horizontal configuration is sometimes desirable where the proposed transmission line crosses under other existing high voltage transmission lines.

A deadend structure is used to change direction and/or wire tension on a transmission line. Deadend structures can use wood, wood laminate, direct steel embedded, or steel on concrete foundation structures and can have a larger cross section than the typical structures.

2.2 Conductors

The double circuit structures will have six single-conductor phase wires (three conductors per circuit) and one shield wire. It is anticipated that the phase wires will be 795 thousand circular mil aluminum-clad steel supported (795 ACSS) or a conductor with similar capacity. The shield wire will be 0.528 optical ground wire.

The table below details specifics on the various structure and conductor types as presented in the route permit application.

Line Type	Conductor	Structure		Foundation	Height	Span
		Type	Material			
115 kV	795 ACSS	Monopole with horizontal post or braced post	Steel	Direct embed or concrete	70 – 95 feet	300 – 400 feet
115 kV	795 ACSS	H-Frame	Steel	Direct embed or concrete	70 – 90 feet	350 – 800 feet
115 kV	795 ACSS	Three-Pole	Steel	Direct embed or concrete	70 – 90 feet	350 – 800 feet

2.3 Substations and Associated Facilities

A new Laketown Substation will be built at the northwest corner of County State Aid Highway 10 and Jersey Avenue. The substation will require installation of new bus work, new breakers, and new control equipment.

3 DESIGNATED ROUTE

The route designated by the Commission is depicted on the route maps attached to this route permit (Designated Route). The Designated Route is generally described as follows:

[Provide detailed description of the authorized route including the route widths and any other specifics relevant to each segment. Also include a reference to the relevant route map to be attached to the route permit.]

The Designed Route includes an anticipated alignment and a right-of-way. The right-of-way is the physical land needed for the safe operation of the transmission line. The Permittee shall locate the alignment and associated right-of-way within the Designated Route unless otherwise authorized by this route permit or the Commission. The Designated Route provides the Permittee with flexibility for minor adjustments of the alignment and right-of-way to accommodate landowner requests and unforeseen conditions.

Any modifications to the Designated Route or modifications that would result in right-of-way placement outside the Designated Route shall be specifically reviewed by the Commission in accordance with Minn. R. 7850.4900 and Section 10 of this route permit.

4 RIGHT-OF-WAY

This route permit authorizes the Permittee to obtain a new permanent right-of-way for the transmission line up to 100 feet in width. The permanent right-of-way is typically 50 feet on both sides of the transmission line measured from its centerline or alignment.

The anticipated alignment is intended to minimize potential impacts relative to the criteria identified in Minn. R. 7850.4100. The final alignment must generally conform to the anticipated alignment identified on the route maps unless changes are requested by individual landowners and agreed to by the Permittee or for unforeseen conditions that are encountered or as otherwise provided for by this route permit.

Any right-of-way or alignment modifications within the Designated Route shall be located so as to have comparable overall impacts relative to the factors in Minn. R. 7850.4100, as does the right-of-way and alignment identified in this route permit, and shall be specifically identified and documented in and approved as part of the plan and profile submitted pursuant to Section 9.1 of this route permit.

Where the transmission line parallels existing highway and other road rights-of-way, the transmission line right-of-way shall occupy and utilize the existing right-of-way to the maximum extent possible; consistent with the criteria in Minn. R. 7850.4100, and the other requirements of this route permit; and for highways under the jurisdiction of the Minnesota Department of Transportation (MnDOT), the procedures for accommodating utilities in trunk highway rights-of-way.

5 GENERAL CONDITIONS

The Permittee shall comply with the following conditions during construction and operation of the Transmission Facility over the life of this route permit.

5.1 Route Permit Distribution

Within 30 days of issuance of this route permit, the Permittee shall provide all affected landowners with a copy of this route permit and the complaint procedures. An affected landowner is any landowner or designee that is within or adjacent to the Designated Route. In no case shall a landowner receive this route permit and complaint procedures less than five days prior to the start of construction on their property. The Permittee shall also provide a copy of this route permit and the complaint procedures to the applicable regional development commissions, county environmental offices, and city and township clerks. The Permittee shall file with the Commission an affidavit of its route permit and complaint procedures distribution within 30 days of issuance of this route permit.

5.2 Access to Property

The Permittee shall notify landowners prior to entering or conducting maintenance within their property, unless otherwise negotiated with the landowner. The Permittee shall keep records of compliance with this section and provide them upon the request of the Minnesota Department of Commerce (Department of Commerce) staff or Commission staff.

5.3 Construction and Operation Practices

The Permittee shall comply with the construction practices, operation and maintenance practices, and material specifications described in the permitting record for this Transmission Facility unless this route permit establishes a different requirement in which case this route permit shall prevail.

5.3.1 Field Representative

The Permittee shall designate a field representative responsible for overseeing compliance with the conditions of this route permit during construction of the Transmission Facility. This person shall be accessible by telephone or other means during normal business hours throughout site preparation, construction, cleanup, and restoration.

The Permittee shall file with the Commission the name, address, email, phone number, and emergency phone number of the field representative at least 14 days prior to the pre-

construction meeting. The Permittee shall provide the field representative's contact information to affected landowners, local government units and other interested persons at least 14 days prior to the pre-construction meeting. The Permittee may change the field representative at any time upon notice to the Commission, affected landowners, local government units and other interested persons. The Permittee shall file with the Commission an affidavit of distribution of its field representative's contact information at least 14 days prior to the pre-construction meeting and upon changes to the field representative.

5.3.2 Employee Training - Route Permit Terms and Conditions

The Permittee shall train all employees, contractors, and other persons involved in the Transmission Facility construction regarding the terms and conditions of this route permit. The Permittee shall keep records of compliance with this section and provide them upon the request of Department of Commerce staff or Commission staff.

5.3.3 Independent Third-Party Monitoring

Prior to any construction, the Permittee shall propose a scope of work and identify an independent third-party monitor to conduct construction monitoring on behalf of the Department of Commerce. The scope of work shall be developed in consultation with and approved by the Department of Commerce. This third-party monitor will report directly to and will be under the control of the Department of Commerce with costs borne by the Permittee. Department of Commerce staff shall keep records of compliance with this section and will ensure that status reports detailing the construction monitoring are filed with the Commission in accordance with scope of work approved by the Department of Commerce.

5.3.4 Public Services, Public Utilities, and Existing Easements

During Transmission Facility construction, the Permittee shall minimize any disruption to public services or public utilities. To the extent disruptions to public services or public utilities occur these shall be temporary, and the Permittee shall restore service promptly. Where any impacts to utilities have the potential to occur the Permittee shall work with both landowners and local entities to determine the most appropriate mitigation measures if not already considered as part of this route permit.

The Permittee shall cooperate with county and city road authorities to develop appropriate signage and traffic management during construction. The Permittee shall keep records of compliance with this section and provide them upon the request of Department of Commerce staff or Commission staff.

5.3.5 Temporary Workspace

The Permittee shall limit temporary easements to special construction access needs and additional staging or lay-down areas required outside of the authorized right-of-way. Temporary space shall be selected to limit the removal and impacts to vegetation. The Permittee shall obtain temporary easements outside of the authorized transmission line right-of-way from affected landowners through rental agreements. Temporary easements are not provided for in this route permit.

The Permittee may construct temporary driveways between the roadway and the structures to minimize impact using the shortest route feasible. The Permittee shall use construction mats to minimize impacts on access paths and construction areas. The Permittee shall submit the location of temporary workspaces and driveways with the plan and profile pursuant to Section 9.1.

5.3.6 Noise

The Permittee shall comply with noise standards established under Minn. R. 7030.0010 to 7030.0080. The Permittee shall limit construction and maintenance activities to daytime working hours to the extent practicable.

5.3.7 Aesthetics

The Permittee shall consider input pertaining to visual impacts from landowners or land management agencies prior to final location of structures, rights-of-way, and other areas with the potential for visual disturbance. The Permittee shall use care to preserve the natural landscape, minimize tree removal and prevent any unnecessary destruction of the natural surroundings in the vicinity of the Transmission Facility during construction and maintenance. The Permittee shall work with landowners to locate the high-voltage transmission line to minimize the loss of agricultural land, forest, and wetlands, and to avoid homes and farmsteads. The Permittee shall place structures at a distance, consistent with sound engineering principles and system reliability criteria, from intersecting roads, highways, or trail crossings.

5.3.8 Soil Erosion and Sediment Control

The Permittee shall implement those erosion prevention and sediment control practices recommended by the Minnesota Pollution Control Agency (MPCA) Construction Stormwater Program. If construction of the Transmission Facility disturbs more than one acre of land or is sited in an area designated by the MPCA as having potential for impacts to water resources, the Permittee shall obtain a National Pollutant Discharge Elimination System/State Disposal System

Construction Stormwater Permit from the MPCA that provides for the development of a Stormwater Pollution Prevention Plan that describes methods to control erosion and runoff.

The Permittee shall implement reasonable measures to minimize erosion and sedimentation during construction and shall employ perimeter sediment controls, protect exposed soil by promptly planting, seeding, using erosion control blankets and turf reinforcement mats, stabilizing slopes, protecting storm drain inlets, protecting soil stockpiles, and controlling vehicle tracking. Contours shall be graded as required so that all surfaces provide for proper drainage, blend with the natural terrain, and are left in a condition that will facilitate re-vegetation and prevent erosion. All areas disturbed during construction of the Transmission Facility shall be returned to pre-construction conditions.

5.3.9 Wetlands and Water Resources

The Permittee shall develop wetland impact avoidance measures and implement them during construction of the Transmission Facility. Measures shall include spacing and placing the power poles at variable distances to span and avoid wetlands, watercourses, and floodplains. Unavoidable wetland impacts as a result of the placement of poles shall be limited to the immediate area around the poles. To minimize impacts, the Permittee shall construct in wetland areas during frozen ground conditions where practicable and according to permit requirements by the applicable permitting authority. When construction during winter is not possible, the Permittee shall use wooden or composite mats to protect wetland vegetation.

The Permittee shall contain soil excavated from the wetlands and riparian areas and not place it back into the wetland or riparian area. The Permittee shall access wetlands and riparian areas using the shortest route possible in order to minimize travel through wetland areas and prevent unnecessary impacts. The Permittee shall not place staging or stringing set up areas within or adjacent to wetlands or water resources, as practicable. The Permittee shall assemble power pole structures on upland areas before they are brought to the site for installation.

The Permittee shall restore wetland and water resource areas disturbed by construction activities to pre-construction conditions in accordance with the requirements of applicable state and federal permits or laws and landowner agreements. The Permittee shall meet the USACE, Minnesota Department of Natural Resources (DNR), Minnesota Board of Water and Soil Resources, and local units of government wetland and water resource requirements.

5.3.10 Vegetation Management

The Permittee shall minimize the number of trees to be removed in selecting the right-of-way specifically preserving to the maximum extent practicable windbreaks, shelterbelts, living snow fences, and vegetation in areas such as trail and stream crossings where vegetative screening

may minimize aesthetic impacts, to the extent that such actions do not violate sound engineering principles or system reliability criteria.

The Permittee shall remove tall growing species located within the transmission line right-of-way that endanger the safe and reliable operation of the transmission line. The Permittee shall leave undisturbed, to the extent possible, existing low growing species in the right-of-way or replant such species in the right-of-way to blend the difference between the right-of-way and adjacent areas, to the extent that the low growing vegetation that will not pose a threat to the transmission line or impede construction.

5.3.11 Application of Pesticides

The Permittee shall restrict pesticide use to those pesticides and methods of application approved by the Minnesota Department of Agriculture (MDA), DNR, and the U.S. Environmental Protection Agency (EPA). Selective foliage or basal application shall be used when practicable. All pesticides shall be applied in a safe and cautious manner so as not to damage adjacent properties including crops, orchards, tree farms, apiaries, or gardens. The Permittee shall contact the landowner at least 14 days prior to pesticide application on their property. The Permittee may not apply any pesticide if the landowner requests that there be no application of pesticides within the landowner's property. The Permittee shall provide notice of pesticide application to landowners and beekeepers operating known apiaries within three miles of the pesticide application area at least 14 days prior to such application. The Permittee shall keep pesticide communication and application records and provide them upon the request of Department of Commerce staff or Commission staff.

5.3.12 Invasive Species

The Permittee shall employ best management practices to avoid the potential introduction and spread of invasive species on lands disturbed by Transmission Facility construction activities. The Permittee shall develop an Invasive Species Prevention Plan and file it with the Commission at least 14 days prior to the pre-construction meeting. The Permittee shall comply with the most recently filed Invasive Species Prevention Plan.

5.3.13 Noxious Weeds

The Permittee shall take all reasonable precautions against the spread of noxious weeds during all phases of construction. When utilizing seed to establish temporary and permanent vegetative cover on exposed soil the Permittee shall select site appropriate seed certified to be free of noxious weeds. To the extent possible, the Permittee shall use native seed mixes. The Permittee shall keep records of compliance with this section and provide them upon the request of Department of Commerce staff or Commission staff.

5.3.14 Roads

The Permittee shall advise the appropriate governing bodies having jurisdiction over all state, county, city, or township roads that will be used during the construction phase of the Transmission Facility. Where practical, existing roadways shall be used for all activities associated with construction of the Transmission Facility. Oversize or overweight loads associated with the Transmission Facility shall not be hauled across public roads without required permits and approvals.

The Permittee shall construct the fewest number of site access roads required. Access roads shall not be constructed across streams and drainage ways without the required permits and approvals. Access roads shall be constructed in accordance with all necessary township, county or state road requirements and permits.

The Permittee shall promptly repair private roads or lanes damaged when moving equipment or when accessing construction workspace, unless otherwise negotiated with the affected landowner.

5.3.15 Archaeological and Historic Resources

The Permittee shall make every effort to avoid impacts to archaeological and historic resources when constructing the Transmission Facility. In the event that a resource is encountered, the Permittee shall consult with the State Historic Preservation Office and the State Archaeologist. Where feasible, avoidance of the resource is required. Where not feasible, mitigation must include an effort to minimize Transmission Facility impacts on the resource consistent with State Historic Preservation Office and State Archaeologist requirements.

Prior to construction, the Permittee shall train workers about the need to avoid cultural properties, how to identify cultural properties, and procedures to follow if undocumented cultural properties, including gravesites, are found during construction. If human remains are encountered during construction, the Permittee shall immediately halt construction and promptly notify local law enforcement and the State Archaeologist. The Permittee shall not resume construction at such location until authorized by local law enforcement or the State Archaeologist. The Permittee shall keep records of compliance with this section and provide them upon the request of Department of Commerce staff or Commission staff.

5.3.16 Avian Protection

The Permittee in cooperation with the DNR shall identify areas of the transmission line where bird flight diverters will be incorporated into the transmission line design to prevent large avian

collisions attributed to visibility issues. Standard transmission design shall incorporate adequate spacing of conductors and grounding devices in accordance with Avian Power Line Interaction Committee standards to eliminate the risk of electrocution to raptors with larger wingspans that may simultaneously come in contact with a conductor and grounding devices. The Permittee shall submit documentation of its avian protection coordination with the plan and profile pursuant to Section 9.2.

5.3.17 Drainage Tiles

The Permittee shall avoid, promptly repair, or replace all drainage tiles broken or damaged during all phases of the Transmission Facility's life unless otherwise negotiated with the affected landowner. The Permittee shall keep records of compliance with this section and provide them upon the request of Department of Commerce staff or Commission staff.

5.3.18 Restoration

The Permittee shall restore the right-of-way, temporary workspaces, access roads, abandoned right-of-way, and other public or private lands affected by construction of the Transmission Facility. Restoration within the right-of-way must be compatible with the safe operation, maintenance, and inspection of the transmission line. Within 60 days after completion of all restoration activities, the Permittee shall file with the Commission a Notice of Restoration Completion.

5.3.19 Cleanup

The Permittee shall remove and properly dispose of all construction waste and scrap from the right-of-way and all premises on which construction activities were conducted upon completion of each task. The Permittee shall remove and properly dispose of all personal litter, including bottles, cans, and paper from construction activities daily.

5.3.20 Pollution and Hazardous Wastes

The Permittee shall take all appropriate precautions to protect against pollution of the environment. The Permittee shall be responsible for compliance with all laws applicable to the generation, storage, transportation, clean up and disposal of all waste generated during construction and restoration of the Transmission Facility.

5.3.21 Damages

The Permittee shall fairly restore or compensate landowners for damage to crops, fences, private roads and lanes, landscaping, drain tile, or other damages sustained during construction. The Permittee shall keep records of compliance with this section and provide them upon the request of Department of Commerce staff or Commission staff.

5.4 Electrical Performance Standards

5.4.1 Grounding

The Permittee shall design, construct, and operate the transmission line in a manner so that the maximum induced steady-state short-circuit current shall be limited to five milliamperes root mean square (rms) alternating current between the ground and any non-stationary object within the right-of-way, including but not limited to large motor vehicles and agricultural equipment. All fixed metallic objects on or off the right-of-way, except electric fences that parallel or cross the right-of-way, shall be grounded to the extent necessary to limit the induced short-circuit current between ground and the object so as not to exceed one milliamperes rms under steady state conditions of the transmission line and to comply with the ground fault conditions specified in the National Electric Safety Code. The Permittee shall address and rectify any induced current problems that arise during transmission line operation.

5.4.2 Electric Field

The Permittee shall design, construct, and operate the transmission line in such a manner that the electric field measured one meter above ground level immediately below the transmission line shall not exceed 8.0 kV/m rms.

5.4.3 Interference with Communication Devices

If interference with radio or television, satellite, wireless internet, GPS-based agriculture navigation systems or other communication devices is caused by the presence or operation of the Transmission Facility, the Permittee shall take whatever action is necessary to restore or provide reception equivalent to reception levels in the immediate area just prior to the construction of the Transmission Facility. The Permittee shall keep records of compliance with this section and provide them upon the request of Department of Commerce staff or Commission staff.

5.5 Other Requirements

5.5.1 Safety Codes and Design Requirements

The Permittee shall design the transmission line and associated facilities to meet or exceed all relevant local and state codes, the National Electric Safety Code, and North American Electric Reliability Corporation requirements. This includes standards relating to clearances to ground, clearance to crossing utilities, clearance to buildings, strength of materials, clearances over roadways, right-of-way widths, and permit requirements.

5.5.2 Other Permits and Regulations

The Permittee shall comply with all applicable state statutes and rules. The Permittee shall obtain all required permits for the Transmission Facility and comply with the conditions of those permits unless those permits conflict with or are preempted by federal or state permits and regulations.

At least 14 days prior to the pre-construction meeting, the Permittee shall file with the Commission an Other Permits and Regulations Submittal that contains a detailed status of all permits, authorizations, and approvals that have been applied for specific to the Transmission Facility. The Other Permits and Regulations Submittal shall also include the permitting agency name; the name of the permit, authorization, or approval being sought; contact person and contact information for the permitting agency or authority; brief description of why the permit, authorization, or approval is needed; application submittal date; and the date the permit, authorization, or approval was issued or is anticipated to be issued.

The Permittee shall demonstrate that it has obtained all necessary permits, authorizations, and approvals by filing an affidavit stating as such and an updated Other Permits and Regulations Submittal prior to commencing construction. The Permittee shall provide a copy of any such permits, authorizations, and approvals at the request of Department of Commerce staff or Commission staff.

6 SPECIAL CONDITIONS

The special conditions shall take precedence over other conditions of this permit should there be a conflict.

6.1 Phase 1 Archaeological Survey

The Permittee shall conduct a Phase 1 archeological survey of the permitted route. The Permittee shall share the results of the survey with the State Historic Preservation Office (SHPO). The Permittee shall implement any recommendations received from SHPO resulting

from the survey. The Permittee shall keep records of compliance with this section and provide them upon the request of Commission staff.

6.2 Calcareous Fens

Should any calcareous fens be identified within the project area, the Permittees must work with DNR to determine if any impacts will occur during any phase of the Project. If the Project is anticipated to impact any calcareous fens, the Permittees must develop a Calcareous Fen Management Plan in coordination with the DNR, as specified in Minn. Stat. § 103G.223. Should a Calcareous Fen Management Plan be required, the approved plan must be submitted concurrently with the plan and profile required in Section 9.2 of the Permit.

6.3 Vegetation Removal (Winter Tree Clearing)

The Permittee shall disturb or clear vegetation within the Designated Site only from November 1 to April 1 to the extent necessary to assure the safe construction, operation, and maintenance of the Project. The Permittee shall minimize the number of trees removed within the Designated Site specifically preserving to the maximum extent practicable windbreaks, shelterbelts, and living snow fences.

6.4 Facility Lighting

The Permittees must use shielded and downward facing lighting and LED lighting that minimizes blue hue for all new project substation and compensation station facilities. Downward facing lighting must be clearly visible on the plan and profile(s) submitted for the project.

6.5 Dust Control

The Permittees shall utilize non-chloride products for dust control during construction.

6.6 Wildlife-Friendly Erosion Control

The Permittees shall use only “bio-netting” or “natural netting” types and mulch products without synthetic (plastic) fiber additives.

6.7 Tree Replacement Plan

The Permittee in coordination with impacted landowners, the DNR and the affected counties shall develop a plan to replace any trees that are removed for construction of the project by planting new seedling or sapling trees first on impacted landowner property or if that's not practical in the affected counties near the project area, and file the plan with the Commission at least 14 days before the pre-

construction meeting. At least 45 days prior to the preconstruction meeting, the Applicant shall make a tree replacement plan compliance filing including an estimate of costs for that construction segment.

The Tree Replacement Plan may include an alternative proposal to fund tree replacements by and through DNR Forestry Programs or other similar public programs. Plantings shall be prioritized in counties through which the line crosses.

7 DELAY IN CONSTRUCTION

If the Permittee has not commenced construction or improvement of the route within four years after the date of issuance of this route permit the Permittee shall file a Failure to Construct Report and the Commission shall consider suspension of this route permit in accordance with Minn. R. 7850.4700.

8 COMPLAINT PROCEDURES

At least 14 days prior to the pre-construction meeting, the Permittee shall file with the Commission the complaint procedures that will be used to receive and respond to complaints. The complaint procedures shall be in accordance with the requirements of Minn. R. 7829.1500 or Minn. R. 7829.1700, and as set forth in the complaint procedures attached to this route permit.

Upon request, the Permittee shall assist Department of Commerce staff or Commission staff with the disposition of unresolved or longstanding complaints. This assistance shall include, but is not limited to, the submittal of complaint correspondence and complaint resolution efforts.

9 COMPLIANCE REQUIREMENTS

Failure to timely and properly make compliance filings required by this route permit is a failure to comply with the conditions of this route permit. Compliance filings must be electronically filed with the Commission.

9.1 Pre-Construction Meeting

Prior to the start of construction, the Permittee shall participate in a pre-construction meeting with Department of Commerce and Commission staff to review pre-construction filing requirements, scheduling, and to coordinate monitoring of construction and site restoration activities. Within 14 days following the pre-construction meeting, the Permittee shall file with the Commission a summary of the topics reviewed and discussed and a list of attendees. The Permittee shall indicate in the filing the anticipated construction start date.

9.2 Plan and Profile

At least 14 days prior to the pre-construction meeting, the Permittee shall file with the Commission, and provide the Department of Commerce, and the counties where the Transmission Facility, or portion of the Transmission Facility, will be constructed with a plan and profile of the right-of-way and the specifications and drawings for right-of-way preparation, construction, structure specifications and locations, cleanup, and restoration for the Transmission Facility. The documentation shall include maps depicting the plan and profile including the right-of-way, alignment, and structures in relation to the route and alignment approved per this route permit.

The Permittee may not commence construction until the earlier of (i) 30 days after the pre-construction meeting or (ii) or until the Commission staff has notified the Permittee in writing that it has completed its review of the documents and determined that the planned construction is consistent with this route permit.

If the Commission notifies the Permittee in writing within 30 days after the pre-construction meeting that it has completed its review of the documents and planned construction, and finds that the planned construction is not consistent with this route permit, the Permittee may submit additional and/or revised documentation and may not commence construction until the Commission has notified the Permittee in writing that it has determined that the planned construction is consistent with this route permit.

If the Permittee intends to make any significant changes in its plan and profile or the specifications and drawings after submission to the Commission, the Permittee shall notify the Commission, the Department of Commerce, and county staff at least five days before implementing the changes. No changes shall be made that would be in violation of any of the terms of this route permit.

9.3 Status Reports

The Permittee shall file with the Commission monthly Construction Status Reports beginning with the pre-construction meeting and until completion of restoration. Construction Status Reports shall describe construction activities and progress, activities undertaken in compliance with this route permit, and shall include text and photographs.

If the Permittee does not commence construction of the Transmission Facility within six months of this route permit issuance, the Permittee shall file with the Commission Pre-Construction

Status Reports on the anticipated timing of construction every six months beginning with the issuance of this route permit until the pre-construction meeting.

9.4 In-Service Date

At least three days before the Transmission Facility is to be placed into service, the Permittee shall notify the Commission of the date on which the Transmission Facility will be placed into service and the date on which construction was completed.

9.5 As-Builts

Within 90 days after completion of construction, the Permittee shall submit to the Commission copies of all final as-built plans and specifications developed during the Transmission Facility construction.

9.6 GPS Data

Within 90 days after completion of construction, the Permittee shall submit to the Commission, in the format requested by the Commission, geo-spatial information (*e.g.*, ArcGIS compatible map files, GPS coordinates, associated database of characteristics) for all structures associated with the Transmission Facility and each substation connected.

9.7 Right of Entry

The Permittee shall allow Commission designated representatives to perform the following, upon reasonable notice, upon presentation of credentials and at all times in compliance with the Permittee's site safety standards:

- (a) To enter upon the facilities easement of the property for the purpose of obtaining information, examining records, and conducting surveys or investigations.
- (b) To bring such equipment upon the facilities easement of the property as is necessary to conduct such surveys and investigations.
- (c) To sample and monitor upon the facilities easement of the property.
To examine and copy any documents pertaining to compliance with the conditions of this route permit.

10 ROUTE PERMIT AMENDMENT

This route permit may be amended at any time by the Commission. Any person may request an amendment of the conditions of this route permit by submitting a request to the Commission in

writing describing the amendment sought and the reasons for the amendment. The Commission will mail notice of receipt of the request to the Permittee. The Commission may amend the conditions after affording the Permittee and interested persons such process as is required under Minn. R. 7850.4900.

11 TRANSFER OF ROUTE PERMIT

The Permittee may request at any time that the Commission transfer this route permit to another person or entity (transferee). In its request, the Permittee must provide the Commission with:

- (a) the name and description of the transferee;
- (b) the reasons for the transfer;
- (c) a description of the facilities affected; and
- (d) the proposed effective date of the transfer.

The transferee must provide the Commission with a certification that it has read, understands and is able to comply with the plans and procedures filed for the Transmission Facility and all conditions of this route permit. The Commission may authorize transfer of the route permit after affording the Permittee, the transferee, and interested persons such process as is required under Minn. R. 7850.5000.

12 REVOCATION OR SUSPENSION OF ROUTE PERMIT

The Commission may initiate action to revoke or suspend this route permit at any time. The Commission shall act in accordance with the requirements of Minn. R. 7850.5100, to revoke or suspend this route permit.