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September 20, 2022

Consumer Affairs Office
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

Re: In the Matter of the Application of Great River Energy for a Route Permit to Rebuild the Existing 69kV ST-WW Transmission Line to 115kV in Stearns County, Minnesota
PUC Docket Numbers: ET-2/TL-22-235

Dear Consumer Affairs Staff,

On September 6th, 2022, the Minnesota Public Utilities Commission (PUC) issued a Notice of Comment Period on Application Completeness for the Application in the above-mentioned matter. The Minnesota Department of Transportation (MnDOT) has reviewed the application regarding the proposed project and submits the following comments in response to the Notice.

On the topics open for comment, MnDOT would like to offer information on the following:

Are there any additional procedural requirements that should be considered?

Yes. In the past, Great River Energy (Applicant) has been impressively proactive in coordinating with our agency prior to submitting applications to the Minnesota Public Utilities Commission. This has not been the case with this project. Aside from the general NOI mailing, which listed my address incorrectly, I was not contacted directly to discuss potential project impacts as shown for other agencies in Appendix E. While it has been noted that this project does not plan to intersect with state trunk highway right-of-way, there are other aspects of planning and construction that could affect the Applicant's work or, at the very least, information from our agency that could be useful to the Applicant throughout this process.

The Applicant correctly states the need for OSOW permits on this project. While there *may* not be a need for any additional MnDOT permits on this project, MnDOT has right-of-way near the project area. As stated in the letter submitted by the City of St. Cloud, specifically the Southwest Beltline Corridor Study, MnDOT has future projects that could affect the timing and planned delivery routes for this project.

It is understood that the level of agency impact varies by project. However, an elevated standard of state agency outreach, regardless of perceived impacts, should be considered. Early coordination with state agencies is a beneficial process for both parties because it serves as a useful informational exchange as well as a tool in helping to avoid future issues in all permitting processes.

Thank you for the opportunity to provide these comments.

Sincerely,

Stacy Kotch Egstad

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Equal Opportunity Employer