

Notice of Environmental Assessment Scoping Decision

In the Matter of the Joint Application of Midwater BESS, LLC for a Site Permit and Route Permit for the up to 150 MW Midwater Energy Storage Project and Associated 161 kV Transmission Line in Freeborn County, Minnesota

Docket Nos. IP-7138/ESS-24-294; IP-7138/TL-24-295

Issued: December 4, 2025

PLEASE TAKE NOTICE that the Minnesota Public Utilities Commission (Commission) has issued the scoping decision for the environmental assessment (EA) that will be prepared for the proposed Midwater Battery Energy Storage System (BESS) project in Freeborn County, Minnesota.

The EA will be prepared by the Commission's Energy Infrastructure Permitting (EIP) environmental review staff and will address the potential human and environmental impacts of the project. The scoping decision identifies those issues that will be studied, as well as those that will not be addressed.

The scoping decision and other relevant documents are available:

- On the Commission's website: <https://puc.eip.mn.gov/web/project/15971> and
- On the State of Minnesota's eDockets system: <https://www.edockets.state.mn.us/documents> (enter either of the docket numbers "24-294" or "24-295").

The EA is scheduled to be completed in the first quarter of 2026. A public hearing will be held in the project area after the EA is complete and available for review.

If you would like more information or if you have questions, please contact Commission staff: Jim Sullivan (jim.sullivan@state.mn.us) (651) 539-1064 or Jacques Harvieux (jacques.harvieux@state.mn.us) (651) 201-2233.

To place your name on the project mailing list, email docketing.puc@state.mn.us or call Leesa Norton at (651) 201-2246 with the docket numbers (24-294; 24-295), your name, email address, and mailing address. Please indicate how you would like to receive notices, delivered either by email or U.S. mail. Placing your name on the project mailing list ensures that you receive the most up-to-date information about the project.

This notice and the scoping decision can be made available in alternative formats, i.e., large print or audio, by calling (651) 296-0406 (voice).

In the Matter of the Joint Application of Midwater BESS, LLC for a Site Permit and Route Permit for the up to 150 MW Midwater Energy Storage Project and Associated 161 kV Transmission Line in Freeborn County, Minnesota

**ENVIRONMENTAL ASSESSMENT
SCOPING DECISION**

**DOCKET NOS. IP-7138/ESS-24-294
IP-7138/TL-24-295**

The above matter has come before the Executive Secretary of the Minnesota Public Utilities Commission (Commission) for a decision on the scope of the environmental assessment (EA) to be prepared for the Midwater battery energy storage system (BESS) project (project) in Freeborn County, Minnesota. The Commission is reviewing this application under [Minnesota Statute 216E \(2023\)](#) and [Minnesota Rule Chapter 7850](#).

Project Description

Midwater BESS, LLC (Midwater), a wholly owned subsidiary of Spearmint Energy, proposes to construct and operate a BESS with a nominal power rating of up to 150 MW alternating current (AC) with approximately 600 megawatt-hours (MWh) of energy capacity on a site of approximately 17 acres in Shell Rock Township, Freeborn County, Minnesota.¹

In addition to battery energy storage enclosures, the facility will also include inverters and transformers, electrical feeder lines, a project substation, stormwater drainage basins, storage and parking areas, and fencing surrounding the perimeter of the facility. Midwater will construct an operations and maintenance facility at the site to house operations and maintenance materials. The facility will connect to the electric grid through a 161 kV tap line of approximately 2,668 feet in length between the project substation and the adjacent Glenworth Substation owned and operated by ITC Midwest.² Midwater anticipates that project construction will begin in early 2027 and that operation will commence in late 2027.

Midwater indicates that the project will help meet the growing demand for renewable energy and will assist Minnesota in reaching its renewable energy objectives by allowing wind and solar resources to continue producing energy at times when they would otherwise be curtailed due to low demand.³ Midwater anticipates entering into a tolling agreement with an affiliated merchant energy business or other third part market participant, rather than a long-term power purchase agreement more typical of renewable projects.⁴ Alternatively, Midwater may sell the project to a utility or operate under a different revenue structure.⁵

¹ Midwater Application, Section 2.1, 24.

² *Ibid*, 24.

³ Midwater Application, Section 1.1, 15.

⁴ *Ibid*, 16.

⁵ Midwater Application, Section 1.1.3, 18.

Project Purpose

The project will provide up to 150 MW of grid-connected battery energy storage for up to four hours, supporting around 100,000 households during peak demand.⁶ Battery energy storage systems play a role in enabling a low-cost, reliable, and carbon-free electric grid by storing excess electricity during low demand and discharging it during high demand. This project will help integrate more renewable energy, particularly wind and solar, by reducing the need to curtail production during off-peak times (e.g., windy nights) and instead storing that energy for daytime use. This shift also decreases reliance on fossil fuel generation and increases production tax benefits for renewable facilities.⁷

Beyond energy shifting, the project will provide voltage and frequency regulation to maintain grid stability. Currently, such services are mainly provided by natural gas plants.⁸ A BESS can deliver stored energy more efficiently and at a lower cost, reducing the need for fossil fuel use. The project enhances grid resilience, supports storm recovery, and reduces energy waste. It also provides indirect benefits to ratepayers by stabilizing the grid without requiring costly new transmission infrastructure.

Regulatory Background

In Minnesota, no person may construct an energy storage system (ESS), defined as a facility capable of operating at a capacity of 10 MW or more, without a site permit from the Commission. Midwater's proposed project will have a nominal power rating of up to 150 MW AC and therefore requires a site permit from the Commission. As an ESS facility, the site permit application qualifies for Commission review under the alternative permitting process described in Minnesota Statute 216E.04. The Midwater 161 kV tap line will require a route permit based on its length and voltage. The project does not require a certificate of need from the Commission because the Project is exempt under Minn. Stat. 216B.243, subd. 8(9).

Midwater filed a combined application for a site and route permit on October 7, 2024. The Commission accepted the combined application as substantially complete in its order dated November 19, 2024. Commission Energy Infrastructure Permitting (EIP) staff are responsible for conducting environmental review for the site and route permit application. An EA will be prepared to meet the applicable environmental review requirements for the application.

Scoping Process

Scoping is the first step in the development of the EA for the project. The scoping process has two primary purposes: (1) to gather public input as to the impacts and mitigation measures to study in the EA, and (2) to focus the EA on those impacts and mitigation measures that will aid in the Commission's decisions on the site and route permit. The EA scoping comment period was open from February 7, 2025, through April 21, 2025. During the comment period and three public meetings, EIP staff received written and oral comments from the public, state and local units of government, a professional union, and the applicant.⁹

⁶ Midwater Application, Section 1.1, 15-16.

⁷ *Ibid.*

⁸ *Ibid.*

⁹ Written comments from the public received on the Scope of the Environmental Assessment, eDockets Nos. [20253-216746-01](#) (Batch 1); [20253-216747-01](#) (Batch 2); [20254-218151-01](#) (Batch 3); [20254-218408-01](#) (Batch 4). Oral comments received on the Scope of the Environmental Assessment, eDockets Nos. [20253-216765-01](#) (Albert Lea Meeting); [20253-216766-01](#) (Virtual Meeting); [20254-218333-01](#) (Glenville Meeting); [20255-218578-01](#) (Batch 5 - Written comments and materials submitted by the public at the Glenville Meeting). Written comments from state and local units of government included: Minnesota

Public Meeting Comments

Three public meetings for the project were held beginning with an in-person event in Albert Lea, Minnesota, on February 18, 2025, followed by a virtual meeting held on February 19, 2025, and an additional in-person meeting in Glenville, Minnesota, on April 7, 2025.

February 19, 2025, Albert Lea, Minnesota

Approximately twenty community members participated in the Albert Lea meeting.¹⁰ Meeting participants commented that the public meeting should have been held at Glenville High School and maintained that the Albert Lea site reflected poor coordination and limited transparency. Additionally, many questioned the project need, claiming that area power outages are rare. They also expressed skepticism about the local necessity for additional energy storage, given current grid reliability and usage patterns.

Meeting participants also presented comments on potential project-related environmental and public health risks, highlighting the site's proximity to the Shell Rock River, raising concerns about groundwater pollution, stormwater runoff, and cross-state watershed impacts. Attendees also questioned the site's suitability due to its proximity to wetlands, wildlife habitat, a nearby school, and residential areas. The region's historical cancer rates were cited, along with concerns about facility fire risk, particularly the release of toxic smoke and whether the local fire department could adequately respond to a battery fire. Many commenters emphasized long-term risks to land use, future homebuilding, and the potential disturbance of Native American cultural resources.

Several residents expressed concerns that construction labor would likely come from outside the area, limiting local economic benefit. They called for project-related job opportunities to support the Glenville economy. A representative from the International Union of Operating Engineers (IUOE) emphasized the value of infrastructure projects like BESS for their members in Minnesota and the Dakotas. The IUOE requested that the EA include labor considerations and local union hiring impacts.

February 20, 2025, Virtual Meeting

Approximately ten community members raised concerns pertaining to project location, particularly its proximity to Glenville-Emmons High School, and the nearby Shell Rock River.¹¹ A representative of the Glenville-Emmons School Board expressed concern about potential environmental and safety impacts, especially given the area's sandy soil and the river's importance. One commenter also questioned whether downstream communities had been informed. Additional concerns included the site's proximity to an anhydrous ammonia storage facility and potential impacts on school enrollment if families feel unsafe. Fire safety was also raised during the virtual meeting, specifically, emergency planning in the event of thermal runaway. Meeting participants requested that future meetings be held in Glenville to ensure greater local access and involvement.

Department of Transportation ([20253-216207-01](#)); Minnesota Department of Natural Resources ([20253-216145-01](#) and [20253-216145-02](#)); Minnesota Pollution Control Agency ([20254-217720-01](#)); Freeborn County, Minnesota ([20254-217825-01](#)); Butler County, Iowa ([20254-217701-01](#)); Shell Rock Lake Township ([20254-217456-01](#)); and the Shell Rock River Watershed District ([20254-218094-01](#)). Written comments were also provided by the IUOE Local 49 and NCSRC of Carpenters ([20254-217919-01](#)) and the Applicant ([20254-217951-01](#)).

¹⁰ Midwater BESS Albert Lea Scoping Meeting, February 19, 2025, transcripts, eDocket no. [20253-216765-01](#)

¹¹ Midwater BESS Virtual Scoping Meeting, February 20, 2025, transcript, eDocket no. [20253-216766-01](#)

April 7, 2025, Glenville, Minnesota

Approximately 80 community members participated in the Glenville, Minnesota meeting.¹² Many commenters focused on the transparency of the site selection process, questioning why the Glenville site was chosen and urged a more thorough review of alternative locations, including other substations. Residents also raised concerns about thermal runaway risks, coolant leaks, and potential contamination of groundwater and the Shell Rock River, especially in the event of fire or system failure. Additionally, commenters expressed concern over stormwater management, flood risk, and the project's cumulative environmental impact, particularly given existing exposures from the nearby ethanol plant, agricultural chemicals, highways, and railroads.

Operational and technical concerns were presented by the public that included the BESS system's functionality, resilience during power outages or cooling system failures, battery lifespan, recycling plans, and decommissioning and waste removal. Comments were also received that sought clarity on emergency monitoring, local response capabilities, and ongoing noise pollution.

Community members commented on tax revenue, levies, the site's tax status, and potential liability and ownership issues, emphasizing the need for local job creation and expressed a strong preference for union labor and local workforce involvement. The use of public subsidies, energy market implications, and the absence of finalized power purchase agreements were also points of concern.

Written Public Comments

The Commission received 335 written comments from citizens during the public comment period.¹³ A common theme among nearly all the written comments focused on inappropriate project siting due to its proximity to sensitive areas, including the Shell Rock River, a public school, daycares, and residential neighborhoods. Many questioned why an industrial energy project is proposed so close to vulnerable populations and critical natural resources.

Several commenters mentioned the risk of thermal runaway fires, which commenters maintained is substantial for lithium-ion batteries. Residents fear such an event could release toxic smoke, require evacuations, and overwhelm the local volunteer fire department. Several commenters asked the developer to fund emergency preparedness, equipment, and training for such a situation.

The Shell Rock River and its watershed were repeatedly identified as vital ecological, recreational, and economic resources, with many comments emphasizing the area's vulnerability to flooding, high water table, and permeable soils. Commenters also speculated that these conditions could worsen contamination impacts in the event of a fire or chemical leak. Many feared a single project failure could undo decades of restoration work and jeopardize wildlife, agriculture, and drinking water downstream.

Commenters also expressed concern over air and water pollution, loss of farmland, and reduced property values. Many argued that the project provides no local economic benefit, with risks far outweighing potential rewards. Requests were made for a \$25 million bond to cover damages and for Glenville to receive a majority share of any tax revenue.

¹² Midwater BESS Albert Lea Scoping Meeting, February 19, 2025, transcripts, eDocket no. [20254-218333-01](#)

¹³ Written comments from the public received on the Scope of the Environmental Assessment, eDockets Nos. [20253-216746-01](#) (Batch 1); [20253-216747-01](#) (Batch 2); [20254-218151-01](#) (Batch 3); [20254-218408-01](#) (Batch 4).

Additionally, commenters criticized the lack of transparency and community engagement. Many said they only recently learned of the project and felt excluded from decisions.

Agency Comments

The Commission received three written comments from state agencies:

Minnesota Department of Transportation

The Minnesota Department of Transportation (MnDOT) reviewed the project and provided comments focused on safety and permitting, emphasizing the importance of minimizing new access points onto the state highways to reduce crash risks.¹⁴ They recommended the applicant use or upgrade existing access northwest of the proposed site rather than creating new direct access from US 65. MnDOT may require turn lanes to improve safety if access from the highway is necessary.

Although the applicant indicated the transmission line would not encroach on MnDOT's highway right-of-way (ROW), MnDOT noted that any future shifts in alignment toward the ROW would require permits and additional consultation.

MnDOT also requested that project boundary maps clearly exclude highway ROW areas where the applicant does not have land rights, showing accurate lease and ownership details. If the project permit is approved, MnDOT expects ongoing coordination regarding permits, traffic control, and construction, with MnDOT staff involved in pre-construction meetings affecting state property.

Minnesota Department of Natural Resources

The Minnesota Department of Natural Resources (DNR) reviewed the combined site and route permit application for the project.¹⁵ The DNR provided several recommendations to minimize environmental and wildlife impacts in the environmental assessment (EA).

The DNR advised increasing the security fence height to at least 10 feet to prevent deer and large wildlife from entering and recommended avoiding barbed wire due to injury risks. Lighting should be shielded and downward-facing, with low blue light emissions to reduce harm to wildlife. The EA should identify any construction dewatering activities, noting that a water appropriation permit is required for withdrawals exceeding 10,000 gallons per day or one million gallons annually.

The DNR also cautioned against using chloride-based dust suppression agents due to toxicity risks and encouraged the EA to detail dust control plans. For erosion control, wildlife-friendly materials like bio-netting are preferred, avoiding plastic mesh products that can harm small animals or pollute nearby waterways. Coordination with vegetation management groups is encouraged to develop native, pollinator-friendly seed mixes for site restoration, avoiding invasive non-native species. The vegetation plan should include wetland features in water storage basins to reduce erosion and support habitat.

Given the project's location in a riparian corridor important for migratory and breeding waterfowl, avian flight diverters must be installed on transmission lines to reduce bird collisions and electrocution

¹⁴ Stacy Kotch Egstad, Minnesota Department of Transportation, to James Sullivan, Minnesota Public Utilities Commission, March 10, 2025, eDocket no. [20253-216207-01](#)

¹⁵ Martine Donovan, Minnesota Department of Natural Resources, to James Sullivan, Minnesota Public Utilities Commission, March 10, 2025, eDocket no. [20253-216145-01](#)

risks. The DNR requested that the EA should address avian interactions and incorporate relevant design standards to protect local bird populations.

Minnesota Pollution Control Agency

Minnesota Pollution Control Agency (MPCA) staff had no comments on the project.¹⁶

Local Government Comments

The Commission received four written comments from local units of government:

Butler County Board of Supervisors (Iowa)

The Butler County Board of Supervisors provided written comment in its role as part of the Shell Rock River Watershed Management Coalition, where the county collaborates with neighboring counties and cities to protect and improve water quality for recreation and environmental health.¹⁷ Butler County illustrated their reliance on the Shell Rock River for tourism and recreational use, noting that it is home to four county-run campgrounds and relies heavily on the river's boating and fishing opportunities. While not opposed to development, Butler County is deeply concerned about projects near the river that could undermine these water quality efforts. Their primary worry is the risk of heavy metal contamination from a potential fire at the proposed facility. Firefighting efforts could wash hazardous chemicals into the river, posing a serious threat to the ecosystem and recreational uses downstream.

Shell Rock River Watershed District

The Shell Rock River Watershed District (District), a local government entity guided by state-approved water management plans, emphasized its commitment to improving water quality and preventing degradation.¹⁸ In reference to the proposed project, the District cites its rules dated February 13, 2007, which require water quality treatment for sites subject to NPDES Phase II regulations. Key requirements include proper maintenance of stormwater facilities to ensure they meet original design performance standards, with settled materials removed as needed and a maintenance plan specifying responsible parties and intervals. The District also mandates that water quality pond designs follow the guidelines outlined in the MPCA's manual *Protecting Water Quality in Urban Areas* (2000 or revised). Treatment must demonstrate removal of total suspended solids and limit discharge to 5.66 cubic feet per second per acre for a 1.25-inch storm event or meet the Nationwide Urban Runoff Program (NURP) treatment volume. Given the BESS site's proximity to the Shell Rock River, the District requests adherence to the more stringent 5.66 cubic feet per second (cfs) design criterion and recommends the installation of skimmers to enhance water treatment before discharge.

Freeborn County Board of Commissioners

The Freeborn County Board of Commissioners provided their Resolution 25-139 as a written comment to formally oppose the proposed project.¹⁹ While recognizing Minnesota's energy goals and the importance of grid reliability, the Board expressed serious concerns about the project's potential

¹⁶ Chris Green, Minnesota Pollution Control Agency, to James Sullivan, Minnesota Public Utilities Commission, April 15, 2025, eDocket no. [20254-217720-01](#)

¹⁷ Wayne Dralle, Rusty Eddy, and Greg Barnett, Butler County Board of Supervisors, Iowa, to James Sullivan, Minnesota Public Utilities Commission, April 15, 2025, eDocket no. [20254-217701-01](#)

¹⁸ Andy Heschele, Shell Rock River Watershed District, to James Sullivan, Minnesota Public Utilities Commission, April 18, 2025, eDocket no. [20254-218094-01](#)

¹⁹ Freeborn County Board of Commissioners Resolution 25-139, submitted to James Sullivan, Minnesota Public Utilities Commission, eDocket no. [20254-217825-01](#)

adverse impacts on public health, safety, welfare, the local community, wildlife, and the environment. Specific risks cited include toxic emissions, fire hazards such as thermal runaway, explosions, and challenges to emergency response capabilities due to the facility's scale and proximity to residences, the Shell Rock River, and sensitive environmental areas. The Board also raised concerns about continuous noise emissions affecting residents and wildlife, and the site's vulnerability to severe weather events that could increase hazardous runoff into the Shell Rock River Watershed. Given these issues, the Board found that the project is inconsistent with the County's goals for public safety and compatible land use.

Shell Rock Township

During the public comment period, the Shell Rock Township Board (Shell Rock) passed a resolution (Resolution # 2025-04-08-1) that formally opposes the proposed project.²⁰ The resolution was provided to the Commission as a formal comment. Shell Rock cites serious concerns over potential environmental and public health risks, including chemical leaks, hazardous material spills, disruption to wildlife habitats, contamination of soil, river, and aquifers, and noise pollution. Emphasizing the importance of protecting the township's environmental integrity and quality of life, Shell Rock calls on relevant authorities and stakeholders to seek alternative solutions that do not endanger the health, safety, or well-being of the community.

Labor Unions

Operating Engineers Local 49 and North Central States Regional Council of Carpenters, representing construction workers, support the proposed project, recognizing its importance in backing up the electric grid when renewable sources aren't producing.²¹ They advocate for a balanced, reasonable environmental review process that doesn't overly burden the applicant or regulators, emphasizing the project's potential to create high-quality, local jobs and contribute to the state's energy goals without discouraging future similar developments.

Applicant

Midwater BESS, LLC submitted a response to comments made by the Shell Rock Township Board and Freeborn County Board of Commissioners, who passed resolutions opposing the project.²² Midwater emphasized that the purpose of the environmental review process is to study impacts based on facts and data and urged stakeholders to wait for the EA before forming conclusions regarding the project. The applicant noted it had actively engaged with local stakeholders, including government officials, agencies, and landowners, since submitting its permit application.

Citizen Advisory Task Force

In response to concerns voiced about the project, the Commission authorized a Citizen Advisory Task Force (ATF) on June 2, 2025, to identify project issues and impacts of local concern and to identify ways

²⁰ Shell Rock Lake Township, Freeborn County, Resolution # 2025-04-0801, submitted to James Sullivan, Minnesota Public Utilities Commission, eDocket no. [20254-217456-01](#)

²¹ Nathan Runke and Richard Kolodziejski, IUOE Local 49 and NCSRC of Carpenters, submitted to Will Seuffert, Minnesota Public Utilities Commission, April 21, 2025, eDocket no. [20254-217919-01](#) and Jeremy P. Duehr, Frederickson & Byron, on behalf of Midwater BESS, Inc., April 21, 2025, eDocket no. [20254-217951-01](#).

²² Midwater BESS, Inc., eDocket no. [20254-217951-01](#)

to avoid, minimize, or mitigate those impacts.²³ In accordance with the Commission's order, Commission EIP staff solicited task force members and facilitated three ATF meetings.²⁴

While task force consensus was not required, the ATF recommendations emphasized environmental protection, fire safety, community involvement, and long-term financial safeguards as essential conditions for the project's approval. Through their deliberations, the task force identified areas of importance for the Commission to consider as they address community concerns in their project permitting decision:²⁵

1. *Water Protection:* The Shell Rock River, its watershed, and state water trail are high-priority concerns. The ATF noted that strong project stormwater management and pollution prevention measures are essential permit conditions and suggested stormwater practices, including stormwater retention basin design modifications and water quality monitoring, to address these concerns.
2. *Wildlife Impacts:* The proximity of the project to a DNR Wildlife Management Area raises wildlife habitat concerns, as the project site would be ineligible for conservation programs.
3. *Fire Safety and Thermal Events:* ATF members supported the use of lithium-iron battery technology but emphasized the need for local firefighter training and firefighting equipment upgrades as permit conditions.
4. *Local Involvement:* ATF members were critical of the limited local notice and input during the application and scoping process and cited community opposition, particularly due to the site's environmental sensitivity. They also expressed concern about the lack of local control.
5. *Cleanup and Decommissioning:* The task force called for clear, enforceable permit requirements to ensure the developer, rather than the local taxpayers, bears any cleanup or decommissioning costs.
6. *Ongoing Collaboration:* Members want continued communication between local officials and site operators on emergency response, contamination, and decommissioning plans.

Two potential alternative sites were considered; however, the ATF was unable to conclude that these sites were viable alternatives for the project.²⁶

HAVING REVIEWED THE MATTER, consulted with EIP staff, and in accordance with Minnesota Rule 7850.3700, I hereby make the following scoping decision:

²³ Minnesota Public Utilities Commission Advisory Task Force Order, service date, June 2, 2025, eDocket no. [20256-219493-01](#) and Minnesota Department of Commerce, Advisory Task Force Establishment, Charge, and Order, June 18, 2025, eDocket no. [20256-220015-01](#)

²⁴ Midwater Energy Storage Project, Minnesota Public Utilities Commission, November, 2025, eDocket no. Task Force Report [202511-224951-01](#)

²⁵ *Ibid.* eDocket no. [202511-224951-01](#)

²⁶ *Ibid.* eDocket no. [202511-224951-01](#)

MATTERS TO BE ADDRESSED

The EA for the proposed project will include a description and analysis of the human and environmental impacts of the project required by Minnesota Rule 7850. It will provide information on the potential impacts of the project as they relate to the topics outlined in this scoping decision and possible mitigation measures. It will identify impacts that cannot be avoided and irretrievable commitments of resources, as well as permits from other government entities that may be required for the project. The EA will discuss the relative merits of the proposed project site with respect to the siting factors in Minnesota Rule 7850.4100.

GENERAL DESCRIPTION OF THE PROJECT

- A. Project Description
- B. Project Purpose
- C. Project Schedule
- D. Project Costs

REGULATORY FRAMEWORK

- A. Site Permit
- B. Route Permit
- C. Environmental Review
- D. Public Hearing
- E. Permit Decisions
- F. Other Permits and Approvals

PROJECT DESIGN, CONSTRUCTION, & OPERATION

- A. Project description (batteries, enclosures, inverters, transformers, substation and transmission intertie, roads, fencing)
- B. Construction
- C. Restoration
- D. Operation and maintenance
- E. Decommissioning

AFFECTED ENVIRONMENT, POTENTIAL IMPACTS AND MITIGATIVE MEASURES

The EA will analyze the human and environmental impacts and potential mitigation measures associated with the proposed project. Potential project impacts, both positive and negative, will be described. Based on the identified impacts, the EA will outline reasonable mitigation measures to reduce or eliminate those impacts. The EA will describe any unavoidable impacts resulting from implementation of the proposed project.

Data and analyses will be commensurate with the level of impact for a given resource and the relevance of the information to consider mitigation measures. EIP staff will evaluate the cost of data and analyses in relation to the relevance and importance of the information to determine the appropriate level of detail for the EA. Less important material may be summarized, consolidated, or simply referenced.

If relevant information cannot be obtained within timelines prescribed by statute and rule, the costs of obtaining such information is excessive, or the means to obtain it is unknown, EIP staff will include a statement in the EA that such information is incomplete or unavailable and the relevance of the information in evaluating potential impacts or alternatives.

- A. Impacts to Human Settlements (typical and atypical operating conditions)
 - 1. Noise
 - 2. Aesthetics (lighting, appearance of project components, fencing)
 - 3. Displacement
 - 4. Socioeconomic impacts (local revenues, taxes, employment)
 - 5. Cultural values
 - 6. Zoning and land use compatibility
 - 7. Property values
 - 8. Public services
 - 9. Communication and electronic interference
 - 10. Public health and safety (worker and public safety)
 - 11. Environmental justice
- B. Impacts to Land Based Economies (typical and atypical operating conditions)
 - 1. Agriculture
 - 2. Forestry
 - 3. Mining
 - 4. Recreation and tourism
- C. Impacts to Archaeological and Historic Resources (typical and atypical operating conditions)
- D. Impacts to the Natural Environment (typical and atypical operating conditions)
 - 1. Air quality
 - 2. Vegetation
 - 3. Wildlife

4. Geology and soils
 5. Water resources (surface water, groundwater, wetlands)
 6. Rare and unique natural resources
- E. Greenhouse Gas Emissions
 - F. Climate Change and Design for Resilience
 - G. Electric System Reliability
 - H. Adverse Impacts that Cannot be Avoided
 - I. Irreversible and Irretrievable Commitments of Resources
 - J. Cumulative Potential Effects

ISSUES OUTSIDE THE SCOPE OF THE EA

The EA will not address the following topics:

- A. The need for the project, including questions of size, type, timing, and alternative system configurations.
- B. Any site or route for the project other than the site and route proposed by Midwater in its combined application.
- C. Any impacts related to the manufacture of the elements of the project including batteries, concrete, fuel used for construction vehicles, etc.
- D. The manner in which landowners are compensated for the project.

SCHEDULE

The EA is anticipated to be completed and issued in the first quarter of 2026. Upon completion, it will be noticed and made available for review. A public hearing will be held after the EA has been issued. Comments on the EA may be submitted into the hearing record.

Signed this 3rd day of DEC 2025

STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION



Sasha Bergman, Executive Secretary

