

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben  
Valerie Means  
Matthew Schuerger  
Joseph K. Sullivan  
John A. Tuma

Chair  
Commissioner  
Commissioner  
Commissioner  
Commissioner

In the Matter of the Great River Energy  
Application for a HVTL Route Permit for the  
Cedar Lake Reroute Project in Scott and Rice  
Counties

SERVICE DATE: July 5, 2023

DOCKET NO. ET-2/TL-23-170

The above entitled matter has been considered by the Commission and the following disposition made:

- 1. Accepted the HVTL Route Permit Applications for the Cedar Lake Reroute Project as substantially complete.**
- 2. Took no action on an advisory task force at this time.**
- 3. Requested a full ALJ report for the project.**

**This decision is issued by the Commission's consent calendar subcommittee, under a delegation of authority granted under Minn. Stat. § 216A.03, subd. 8 (a). Unless a party, a participant, or a Commissioner files an objection to this decision within ten days of receiving it, it will become the Order of the full Commission under Minn. Stat. § 216A.03, subd. 8 (b).**

The Commission agrees with and adopts the recommendations of the Department of Commerce, which are attached and hereby incorporated into the Order.

BY ORDER OF THE COMMISSION

*William C. Brthke for*

Will Seuffert  
Executive Secretary



To request this document in another format such as large print or audio, call 651.296.0406 (voice). Persons with a hearing or speech impairment may call using their preferred Telecommunications Relay Service or email [consumer.puc@state.mn.us](mailto:consumer.puc@state.mn.us) for assistance.



## BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

### ENERGY ENVIRONMENTAL REVIEW AND ANALYSIS COMMENTS AND RECOMMENDATIONS

#### In the Matter of the Great River Energy Application for a HVTL Route Permit for the Cedar Lake Reroute Project in Scott and Rice Counties Docket No. ET2/TL-23-170

---

**Date:** June 15, 2023

**Staff:** William Cole Storm | [bill.storm@state.mn.us](mailto:bill.storm@state.mn.us) | 651-539-1844

**Issues Addressed:**

These comments and recommendations address the completeness of the HVTL Route Permit Application submitted for the project, whether there is a need for an advisory task force, if there are any potential disputed issues, and a recommendation on the review process.

**Figures and Tables:**

Figure 1: Project Overview Map

Table 1: Process Timing and Milestones

Table 2: Application Completeness Checklist

Additional documents and information can be found on eDockets <https://www.edockets.state.mn.us/EFiling/search.jsp> (year="23" and either number "170")

This document can be made available in alternative formats, i.e., large print or audio tape by calling 651-539-1530.

---

## Introduction and Background

On June 7, 2023, Great River Energy (Applicant) submitted a high voltage transmission line (HVTL) Route Permit Application (RPA) to the Minnesota Public Utilities Commission (Commission).<sup>1</sup> The RPA is submitted under the alternative review process (Minnesota Statute 216E.04; Minnesota Rule 7850.2800-3900).

---

<sup>1</sup> Great River Energy Cedar Lake Reroute Application, pp. 1-1 through 1-7. June 7, 2023. eDocket No. 20236-196404-02.

## Project Purpose and Description

The Project is being done to make room for a second 345-kV circuit to be attached to the existing CapX2020 Brookings to Hampton transmission structures, which run along County Road 2 in the Project area. The Project will include construction of a new approximately 6.3-mile 115-kV transmission line. The transmission line will connect at GRE's existing MV-EVX 115-kV transmission line near the intersection of County Road 23 and Minnesota Highway 19 and extend to the existing Cedar Lake Substation south of County Road 2. The Project will initially operate at 69 kV; designing to 115-kV standards will simplify operating the regional transmission system at 115 kV as electrification and load development increases in the area. Once the transmission line is constructed and connected to the substation, GRE's existing 4.5-mile MV-CDT 115-kV transmission circuit, which is co-located in part on the CapX2020 345-kV transmission structures along County Road 2, will be removed (**Figure 1**).

## Regulatory Process and Procedures (Certificate of Need)

A Certificate of Need (CN) from the Public Utilities Commission is required for all "large energy facilities," unless the facility falls within a statutory exemption from the CN requirements.<sup>2</sup> A large energy facility is defined as "any high-voltage transmission line with a capacity of 100 kV or more with more than ten miles of its length in Minnesota or that crosses a state line."<sup>3</sup>

The proposed Project is less than ten miles in length and does not cross a state line; therefore, a Certificate of Need is not required.

## Regulatory Process and Procedures (HVTL Route Permit)

The Cedar Lake Reroute Project requires an HVTL route permit from the Commission.<sup>4</sup> The Project qualifies for review under the alternative permitting process authorized by Minnesota Statutes § 216E.04, subd. 2(3) and Minnesota Rules 7850.2800, Subp. 1(C) because the proposed transmission line, which is rated at 115 kV, lies between the regulatory threshold of 100 to 200kV.

Applicants must provide the commission with written notice of their intent to file an application under the alternative permitting process,<sup>5</sup> which was provided on May 3, 2023.<sup>6</sup>

## Application and Acceptance

Route permit applications must provide specific information.<sup>7</sup> This includes, but is not limited to, information about the applicant, descriptions of the project and site, and discussion of potential human and environmental impacts and possible mitigation measures.<sup>8</sup> Under the alternative permitting process

---

<sup>2</sup> Minn. Stat. 216B.243, subd. 2; Minn. Stat. 216B.2421, subd. 2(1 and 2).

<sup>3</sup> Minn. Stat. § 216B.2421, subd. 2(3) (2006).

<sup>4</sup> Minn. Stat. 216E.03, subd. 1 and 2.

<sup>5</sup> Minn. R. 7850.2800, subp. 2.

<sup>6</sup> Great river Energy, Notice of Intent to File Route Permits Under the Alternative Process, May 3, 2023. eDocket No. 20235-195541-01.

<sup>7</sup> Minn. Stat. 216E.04, subd. 3; Minn. R. 7850.3100.

<sup>8</sup> Ibid.

an applicant is not required to propose alternative sites or routes; however, if alternatives were evaluated and rejected, the application must describe these and the reasons for rejecting them.<sup>9</sup>

Upon receiving a HVTL route permit application, the Commission may accept it as complete, reject it and advise the applicant of its deficiencies, or accept it as complete but require the applicant submit additional information.<sup>10</sup>

Once the Commission determines an application is complete, the formal environmental review process can begin.

## Public Advisor

Upon acceptance of a route permit application the Commission must designate a public advisor.<sup>11</sup> The public advisor answers questions about the permitting process but cannot provide legal advice or act as an advocate for any person.

## Advisory Task Force

The Commission may appoint an advisory task force to aid in the environmental review process.<sup>12</sup> An advisory task force would assist EERA staff in identifying additional routes or particular impacts to evaluate in the EA prepared for the project.<sup>13</sup> If appointed, an advisory task force must include certain local government representatives.<sup>14</sup> The advisory task force expires upon completion of its charge or issuance of the scoping decision.<sup>15</sup>

Appointment of an advisory task force is not required at the time of application acceptance; in the event no advisory task force is appointed citizens may request one be created.<sup>16</sup> If such a request is made, the commission must make this determination at its next scheduled agenda meeting.<sup>17</sup>

The decision whether to appoint an advisory task force, does not need to be made at this time; however, a decision should be made as soon as practicable to ensure an advisory task force could complete its charge prior to issuance of the scoping decision.

## Environmental Review

Route permit applications are also subject to environmental review. The alternative permitting process requires completion of an EA, which is prepared by EERA staff.<sup>18</sup> An EA contains an overview of the resources affected by the project and discusses potential human and environmental impacts and

---

<sup>9</sup> Ibid.

<sup>10</sup> Minn. R. 7850.3200.

<sup>11</sup> Minn. R. 7850.3400.

<sup>12</sup> Minn. Stat. 216E.08, subd. 1; Minn. R. 7850.3600, subp. 1.

<sup>13</sup> Minn. R. 7850.2400, subp. 3.

<sup>14</sup> Minn. Stat. 216E.08, subd. 1.

<sup>15</sup> Minn. R. 7850.2400, subp. 4.

<sup>16</sup> Minn. R. 7850.2400, at subp. 2.

<sup>17</sup> Ibid.

<sup>18</sup> Minn. Stat. 216E.04, subd. 5; Minn. R. 7850.3700, subp. 1.

mitigation measures.<sup>19</sup> Under the alternative permitting process an EA is the only required state environmental review document.<sup>20</sup>

EERA conducts necessary public scoping meetings in conjunction with a public comment period to inform the content of the EA (i.e., scoping).<sup>21</sup> The commissioner of the Department issues the scope of the EA,<sup>22</sup> and may include alternative routes suggested during the scoping process if they would aid the Commission in making a permit decision.<sup>23</sup>

## Public Hearing

The alternative permitting process requires a public hearing be held in the project area upon completion of the EA<sup>24</sup> in accordance with the procedures outlined in Minnesota Rule 7850.3800, subpart 3.

The hearing is typically presided over by an ALJ from the OAH. The Commission may request that the ALJ provide solely a summary of public testimony. Alternately, the Commission may request that the ALJ provide a full report with findings of fact, conclusions of law, and recommendations regarding the project.

## Final Decision

The Commission is required to make an HVTL route permit decision within six months from the date an application is accepted.<sup>25</sup> This time limit may be extended up to three months for just cause or upon agreement of the applicant.<sup>26</sup>

# EERA Staff Analysis and Comments

## Application Completeness

EERA staff has reviewed and provided comments to the Applicant on a draft RPA prior to the June 7, 2023, submittal date. Generally, EERA staff consults with applicants during the preparation of a draft application. In this case, staff made a number of comments on the draft document. Staff has subsequently fully evaluated the submitted HVTL Route Permit Application against the application completeness requirements of Minnesota Rule 7850.3100 (see **Table 2. Application Completeness Checklist**).

Staff finds that the application contains appropriate and complete information with respect to these requirements, including descriptions of the proposed Project, potential environmental impacts and mitigation measures, and any federal, state, and local approvals that might be required for the Project.

---

<sup>19</sup> Minn. Stat. 216E.04, subd. 5; Minn. R. 7850.3700, subp. 4.

<sup>20</sup> Minn. Stat. 216E.04, subd. 5.

<sup>21</sup> Minn. R. 7850.3700, subp. 2.

<sup>22</sup> Id. at subp. 3.

<sup>23</sup> Id. at subp. 2.

<sup>24</sup> Minn. R. 7850.3800, subp. 1.

<sup>25</sup> Minn. R. 7850.3900, subp. 1.

<sup>26</sup> Ibid.

EERA concludes that the Application meets the content requirements of Minnesota Rule 7850.3100 and is substantially complete. Application acceptance allows initiation of the public participation and environmental review processes. EERA requests that the Applicant continue to supply further information as necessary during preparation of the Environmental Assessment.

## Contested Issues of Fact

At this time, staff is unaware of contested issues of fact with respect to the HVTL Route Permit Application.

## Advisory Task Force

EERA staff has analyzed the merits of establishing an advisory task force for the Cedar Lake Reroute project. In analyzing the need for an advisory task force, EERA staff considered four characteristics: project size, project complexity, known or anticipated controversy, and sensitive resources.

- **Project Size.** The size of this project, in terms of length and voltage (approximately 6.3 miles and 115 kV), would be considered small in comparison to recent projects that have come before the Commission. This fact weights against the establishment of a task force.
- **Project Complexity.** The Cedar Lake Reroute Project in and of itself does not have many parts or much complexity; however, it is a necessary step in the development of a much larger project, the CapX2020 second 345-kV circuit. The existing GRE 115-kV line is currently installed in the second circuit position on the CapX2020 structures 044 through 068 in the Helena to Chub Lake segment of the Brookings project. Great River Energy is now required to relocate this existing 115-kV line to allow the CapX2020 owners to construct the remaining Brookings project's second circuit lines. These facts weights against the establishment of a task force.
- **Known or Anticipated Controversy.** To date, staff has not been contacted about the project, nor received comments on this docket regarding specific concerns or issues from stakeholders.

The public will have opportunities to raise concerns and issues during the scoping process. As it has previously, EERA will assist citizens and governmental units in understanding the environmental review process and how to best identify issues to be addressed and considered in the EA.

EERA staff attended an Open House held by GRE at the American Legion Park Ballroom in New Prague, Minnesota on March 29, 2023. Significant opposition to the Project is not anticipated.

These facts weights against the establishment of a task force.

- **Sensitive Resources.** The Project is located in Scott and Rice Counties, Minnesota within the Big Woods Subsection of the Eastern Broadleaf Forest Province, according to the MDNR Ecological Classification System. The environmental setting of the Project Area includes several hydrologic features, such as wetlands, ponds, streams, and lakes, including Cedar Lake, Mud Lake, and Sand Creek. Land use within the Project Area is primarily agricultural and rural residential areas, with pockets of industrial/commercial development.

Preliminary review of the information contained in the RPA did not identify any resource issues uncommon in routing linear projects in rural Minnesota. Given that much of the Project is proposed to be routed along existing utility, pipeline, and road ROWs, the potential impacts to sensitive ecological resources are anticipated to be minimal.

These facts weights against the establishment of a task force.

## EERA Staff Recommendations

EERA staff recommends that the Commission accept the HVTL Route Permit Applications for the Cedar Lake Reroute Project as substantially complete.

EERA staff also recommends that the Commission take no action on an advisory task force at this time.

EERA staff recommends that the Commission request a full ALJ report for the project. EERA staff believes that a full ALJ report with recommendations provides an unbiased, efficient, and transparent method to air and resolve any issues that may emerge as the record is developed. Requiring a full ALJ report reduces the burden on Commission staff and helps to ensure that the Commission has a robust record on which to base its decision. Additionally, a full ALJ report does not significantly lengthen the site permitting process. EERA staff has provided a draft schedule concept for the permitting process, which includes a comparison of potential hearing work products and schedules – i.e. a summary of public testimony vs. a full ALJ report with findings, conclusions, and recommendations. **Table 1** provides a hypothetical comparison of schedules between the two processes.<sup>27</sup>

---

<sup>27</sup> This schedule is provided for comparison purposes only. Selecting one process over the other does not mean the corresponding schedule applies.

**Figure 1. Project Overview Map**









**Table 1. Process Timing and Tentative Schedule**

Approximate Date	Project Day	Alternative Review Process Step	Responsible Party
March 22, 2021		10-day Notice	Applicant
April 20, 2021		Application Filed	Applicant
May 18, 2021		Application Completeness Comments	Agencies/Public
May 25, 2021		Reply Comments	Applicant/Public
TBD		Consideration of Application Acceptance	Commission
Acceptance through Environmental Assessment			
	0	Application Acceptance Order	Commission
		Public/Scoping Meeting Notice	EERA/Commission
	30	Public Information/Scoping Meeting	EERA/Commission
	45	Scoping Comment Period Closes	EERA
	60	Scoping Summary to Commission	EERA
	85	Commission Review of Alternatives	Commission
	95	Scoping Decision Issued	Commerce
	185	Environmental Assessment Issued	EERA
		Public Hearing Notice	Commission
Summary of Public Testimony*			
	200	Public Hearing	OAH
	215	Comment Period Closes	OAH
	220	ALJ Submits Transcript and Comments	OAH
	225	Draft Findings of Fact (FOF)	Applicant
	240	Comments on Draft FOF/Technical Analysis	EERA
		Response to Hearing Comments	Applicant
		ALJ Submits Summary Report	OAH
	270	Consideration of Route Permit Issuance	Commission
Full ALJ Report with Findings, Conclusions, and Recommendations			
	200	Public Hearing	OAH
	215	Comment Period Closes	OAH
	220	ALJ Submits Transcript and Comments	OAH

	225	Draft FOF	Applicant
	240	Comments on Draft FOF/Technical Analysis	EERA
		Response to Hearing Comments	Applicant
	270	ALJ Issues FOF and Recommendation	OAH
	285	Exceptions to ALJ Report	EERA/Applicant
	315	Consideration of Route Permit Issuance	Commission

\* **A Summary of Public Testimony** includes:

- The hearing process consists of a public hearing (or multiple hearings depending on the project) and one comment period (closing at least 10 days after the last public hearing).
- An ALJ presides over the public hearing.
- ALJ provides a summary of the public hearing and comments only.
- Applicant provides proposed findings of fact, conclusions and a recommendation.
- EERA responds to comments on the EA; provide technical analysis; and responds to the applicant proposed findings.
- No exception period is provided.

\*\***A Full ALJ Report with Findings, Conclusions and Recommendations** includes:

- The hearing process is identical to the summary report process.
- An ALJ presides over the public hearing.
- Applicant provides proposed findings of fact, conclusions and a recommendation.
- EERA responds to comments on the EA; provides technical analysis; and responds to the applicant's proposed findings.
- The ALJ provides a summary and findings of fact, conclusions and recommendations on alternatives and permit conditions
- An exception period pursuant to Minnesota Rule 7829.2700 is provided.

**Table 2. Application Completeness Checklist**

Authority	Required Information	Location in Application
Minn. Stat. § 216E.04, subd. 2(3)	<b>Alternative Review of Applications.</b> Alternative review is available for high voltage transmission lines (HVTL) of between 100 and 200 kV	2.2
Minn. Stat. § 216E.04, subd. 4; Minn. R. 7850.2800, Subp. 1(C)	Subpart 1. <b>Eligible Projects.</b> An applicant for a site permit or a route permit for one of the following projects may elect to follow the procedures of parts 7850.2800 to 7850.3900 instead of the full permitting procedures in parts 7850.1700 to 7850.2700: <b>high voltage transmission lines of between 100 and 200 kilovolt (kV)</b>	Appendix C
Minn. R. 7850.2800, Subp. 2.	Subpart 2. <b>Notice to Minnesota Public Utilities Commission (Commission).</b> An applicant for a permit for one of the qualifying projects in subpart 1, who intends to follow the procedures of parts 7850.2800 to 7850.3700, shall notify the Commission of such intent, in writing, at least ten days before submitting an application for the project	Appendix C
Minn. R. 7850.3100	<b>Contents of Application</b> (alternative permitting process) The applicant shall include in the application the same information required in part 7850.1900, except the applicant need not propose any alternative sites or routes to the preferred site or route. If the applicant has rejected alternative sites or routes, the applicant shall include in the application the identity of the rejected sites or routes and an explanation of the reasons for rejecting them	This document.
Minn. R. 7850.1900, Subp. 2 (as applicable per Minn. R. 7850.3100)	<b>Route Permit for HVTL</b> A. a statement of proposed ownership of the facility at the time of filing the application and after commercial operation	3.3
	B. the precise name of any person or organization to be initially named as permittee or permittees and the name of any other person to whom the permit may be transferred if transfer of the permit is contemplated	3.3
	C. rejected alternative routes and the reasons for rejecting	Chapter 4
	D. a description of the proposed high voltage transmission line and all associated facilities including the size and type of the high voltage transmission line	3.1; 3.2
	E. the environmental information required under 7850.1900, Subp. 3	Chapter 6
	F. identification of land uses and environmental conditions along the proposed routes	Chapter 6
	G. the names of each owner whose property is within any of the proposed routes for the high voltage transmission line	Appendix E

Authority	Required Information	Location in Application
	H. United States Geological Survey topographical maps or other maps acceptable to the chair showing the entire length of the high voltage transmission line on all proposed routes	Figure 1-2; Figure 3-1; Appendix A
	I. identification of existing utility and public rights-of-way along or parallel to the proposed routes that have the potential to share right-of-way (ROW) with the proposed line	5.3
	J. the engineering and operational design concepts for the proposed high voltage transmission line, including information on the electric and magnetic fields of the transmission line	3.2; 6.3.1
	K. cost analysis of each route, including the costs of constructing, operating, and maintaining the high voltage transmission line that are dependent on design and route	3.5; 5.7
	L. a description of possible design options to accommodate expansion of the high voltage transmission line in the future	5.2
	M. the procedures and practices proposed for the acquisition and restoration of the ROW, construction, and maintenance of the high voltage transmission line	5.4; 5.5; 5.6; 5.7
	N. a listing and brief description of federal, state, and local permits that may be required for the proposed high voltage transmission line	2.3; Table 2-1
	O. a copy of the Certificate of Need or the certified HVTL list containing the proposed high voltage transmission line or documentation that an application for a Certificate of Need has been submitted or is not required	2.1
Minn. R. 7850.1900, Subp. 3	<b>Environmental Information</b>	
	A. a description of the environmental setting for each site or route	6.1
	B. a description of the effects of construction and operation of the facility on human settlement, including, but not limited to, public health and safety, displacement, noise, aesthetics, socioeconomic impacts, cultural values, recreation, and public services	6.2; 6.3
	C. a description of the effects of the facility on land-based economies, including, but not limited to, agriculture, forestry, tourism, and mining	6.5
	D. a description of the effects of the facility on archaeological and historic resources	6.6
	E. a description of the effects of the facility on the natural environment, including effects on air and water quality resources and flora and fauna	6.7
	F. a description of the effects of the facility on rare and unique natural resources	6.7.5

Authority	Required Information	Location in Application
	G. identification of human and natural environmental effects that cannot be avoided if the facility is approved at a specific site or route	6.10
	H. a description of measures that might be implemented to mitigate the potential human and environmental impacts identified in items A to G and the estimated costs of such mitigative measures	3.5; Chapter 6
Minn. R. 7850.2100, Subp. 2 (applicable per Minn. R. 7850.3300)	<b>Notice of Project</b> Notification to persons on the Commission's general list, to local officials, and to property owners	To be provided
Minn. R. 7850.2100, Subp 4	Publication of notice in a legal newspaper of general circulation in each county in which the route is proposed to be located.	To be published
Minn. R. 7850.2100. Subp. 5	Confirmation of notice by affidavits of mailing and publication with copies of the notices	Submit when available
Minn. R. 7850.4100	<b>Factors to be Considered in Permitting a HVTL</b> A. effects on human settlement, including, but not limited to, displacement, noise, aesthetics, cultural values, recreation, and public services	6.2
	B. effects on public health and safety	6.3
	C. effects on land-based economies, including, but not limited to, agriculture, forestry, tourism, and mining	6.5
	D. effects on archaeological and historic resources	6.6
	E. effects on the natural environment, including effects on air and water quality resources and flora and fauna	6.7
	F. effects on rare and unique natural resources	6.7.5
	G. application of design options that maximize energy efficiencies, mitigate adverse environmental effects, and could accommodate expansion of transmission or generating capacity	3.2; 5.2
	H. use or paralleling of existing rights-of-way, survey lines, natural division lines, and agricultural field boundaries	3.2; 5.3
	I. use of existing large electric power generating plant sites	Not applicable
	J. use of existing transportation, pipeline, and electrical transmission systems or rights-of-way	5.3
	K. electrical system reliability	1.5; 7.1
	L. costs of constructing, operating, and maintaining the facility which are dependent on design and route	3.5
	M. adverse human and natural environmental effects which cannot be avoided	6.10
	N. irreversible and irretrievable commitments of resources	6.10



Authority	Required Information	Location in Application
Minn. R. 7850.4300, Subps. 1 and 2	<p>Prohibited Routes</p> <p><b>Wilderness areas.</b> No high voltage transmission line may be routed through state or national wilderness areas</p> <p><b>Parks and natural areas.</b> No high voltage transmission line may be routed through state or national parks or state scientific and natural areas unless the transmission line would not materially damage or impair the purpose for which the area was designated, and no feasible and prudent alternative exists. Economic considerations alone do not justify use of these areas for a high voltage transmission line</p>	No wilderness areas or parks are crossed
Minn. Stat. §216E.03, Subd.7 (applicable per Minn. Stat. §216E.04, Subd. 8), House File 7 amendments (2023)	<p><b>Considerations in designating sites and routes</b></p> <p>(1) Evaluation of research and investigations relating to the effects on land, water and air resources of large electric power generating plants and high voltage transmission lines and the effects of water and air discharges and electric and magnetic fields resulting from such facilities on public health and welfare, vegetation, animals, materials and aesthetic values, including base line studies, predictive modeling, and evaluation of new or improved methods for minimizing adverse impacts of water and air discharges and other matters pertaining to the effects of power plants on the water and air environment</p>	Chapter 6
	(2) Environmental evaluation of sites and routes proposed for future development and expansion and their relationship to the land, water, air, and human resources of the state	5.2
	(3) Evaluation of the effects of new electric power generation and transmission technologies and systems related to power plants designed to minimize adverse environmental effects	Not applicable
	(4) Evaluation of the potential for beneficial uses of waste energy from proposed large electric power generating plants	Not Applicable
	(5) Analysis of the direct and indirect economic impact of proposed sites and routes including, but not limited to, productive agricultural land lost or impaired	6.4; 6.5
	(6) Evaluation of adverse direct and indirect environmental effects that cannot be avoided should the proposed site and route be accepted	Chapter 6
	(7) Evaluation of alternatives to the applicant's proposed site or route proposed pursuant to subdivisions 1 and 2	Chapter 4
	(8) Evaluation of potential routes that would use or parallel existing railroad and highway rights-of way	5.3; Chapter 6
	(9) Evaluation of governmental survey lines and other natural division lines of agricultural land to minimize interference with agricultural operations	5.3; 6.5.1

Authority	Required Information	Location in Application
	(10) Evaluation of the future needs for additional high voltage transmission lines in the same general area as any proposed route, and the advisability of ordering the construction of structures capable of expansion in transmission capacity through multiple circuiting or design modifications	5.2
	(11) Evaluation of irreversible and irretrievable commitments of resources should the proposed site or route be approved	6.10
	(12) When appropriate, consideration of problems raised by other state and federal agencies and local entities	Not applicable
	(13) Evaluation of the benefits of the proposed facility with respect to (i) the protection and enhancement of environmental quality, and (ii) the reliability of state and regional energy supplies	Chapter 7; 1.5
	(14) evaluation of the proposed facility's impact on socioeconomic factors	6.2.4
	(15) evaluation of the proposed facility's employment and economic impacts in the vicinity of the facility site and throughout Minnesota, including the quantity and quality of construction and permanent jobs and their compensation levels. The commission must consider a facility's local employment and economic impacts and may reject or place conditions on a site or route permit based on the local employment and economic impacts.	3.7

## **CERTIFICATE OF SERVICE**

I, Robin Benson, hereby certify that I have this day, served a true and correct copy of the following document to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States mail at St. Paul, Minnesota.

### **Minnesota Public Utilities Commission ORDER**

Docket Number: **ET-2/TL-23-170**

Dated this **5th** day of **July, 2023**

/s/ Robin Benson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jon	Brekke	jbrekke@grenergy.com	Great River Energy	12300 Elm Creek Boulevard  Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_23-170_TL-23-170
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_23-170_TL-23-170
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_23-170_TL-23-170
Breann	Jurek	bjurek@fredlaw.com	Fredrikson & Byron PA	60 S Sixth St Ste 1500  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-170_TL-23-170
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_23-170_TL-23-170
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_23-170_TL-23-170
Mark	Strohfus	mstrohfus@grenergy.com	Great River Energy	12300 Elm Creek Boulevard  Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_23-170_TL-23-170
Haley	Waller Pitts	hwallerpitts@fredlaw.com	Fredrikson & Byron, P.A.	60 S Sixth St Ste 1500  Minneapolis, MN 55402-4400	Electronic Service	No	OFF_SL_23-170_TL-23-170