

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben  
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John A. Tuma

Chair  
Commissioner  
Commissioner  
Commissioner  
Commissioner

In the Matter of the Application of Great  
River Energy for a Route Permit to Rebuild  
the Existing 69 kV ST-WW Transmission  
Line to 115 kV in Stearns County, Minnesota

ISSUE DATE: October 23, 2023

DOCKET NO. ET-2/TL-22-235

ORDER ADOPTING  
ADMINISTRATIVE LAW JUDGE  
REPORT AND ISSUING ROUTE  
PERMIT

**PROCEDURAL HISTORY**

On August 25, 2022, Great River Energy (GRE or the Applicant) filed an application for a route permit to rebuild 3.2 miles of an existing 69-kilovolt (kV) transmission line in Stearns County (the Project). The line would be reconstructed as a 115-kV transmission line.

On November 21, 2022, the Commission issued an order finding GRE's application complete, authorizing use of the alternative permitting process, and referring the matter to the Office of Administrative Hearings with a request that an administrative law judge (ALJ) preside over the proceedings and issue a report of their findings and recommendations.<sup>1</sup> The Commission also issued a Notice of Public Information and Environmental Assessment Scoping Meeting.

On January 31, 2023, EERA filed a decision on the scope of the environmental assessment to be prepared for the Project.

On May 2, 2023, EERA filed the environmental assessment and draft route permit for the Project.

On May 17 & 18, 2023, ALJ Suzanne Todnem held public hearings in person in St. Joseph, Minnesota, and remotely via WebEx, respectively.

On June 1, 2023, EERA filed an amended draft route permit for the Project.

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<sup>1</sup> Order Finding Application Complete and Referring the Matter for Summary Proceedings (Nov. 21, 2022). Because the Project is a high-voltage transmission line between 100 and 200 kV, it qualified for the alternative permitting process in Minn. Stat. § 216E.04 and Minn. R. 7850.2900-.3900, which offers a more simplified and streamlined procedure.

On August 4, 2023, ALJ Todnem filed her Findings of Fact, Conclusions of Law, and Recommendations (ALJ Report).

On August 11, 2023, EERA and GRE filed letters indicating that they had no exceptions to the ALJ Report.

On September 7, 2023, the Commission met to consider the matter.

## **FINDINGS AND CONCLUSIONS**

### **I. The Project**

GRE is a generation and transmission cooperative that provides electrical energy and related services to 28 distribution cooperatives and transmission customers serving more than 720,000 retail customers in Minnesota and Wisconsin.

GRE applied to rebuild approximately 3.2 miles of an existing transmission line in Stearns County and convert it from 69 kV to 115 kV. GRE stated that the Project would complete the conversion of the regional transmission system to 115-kV service, which will improve service reliability and resiliency. GRE estimates that the Project will cost approximately \$6.4 million.

GRE proposed to remove the existing transmission line and structures and replace those facilities with an overhead 115-kV transmission line and structures, following the alignment of the existing transmission line to the extent possible after stakeholder engagement. GRE also proposed to extend the line approximately 170 feet northwesterly near the existing Le Sauk Substation to tap into a new 115-kV switch on an existing GRE transmission line, along with installing new equipment at the West St. Cloud, Westwood, and Le Sauk substations.

### **II. Environmental Review**

An environmental assessment is required for environmental review under the alternative permitting process for high-voltage transmission lines.<sup>2</sup> The environmental assessment must contain information on the human and environmental impacts of the proposed project and address mitigating measures for all sites or routes considered. EERA defined the scope of and prepared the environmental assessment after receiving input from other agencies and GRE.

The ALJ determined that the environmental assessment is complete because it addressed the issues and alternatives raised in the scoping decision, as required by Minn. R. 7850.3900, subp. 2. The Commission agrees with the ALJ that the environmental assessment adequately addressed the issues raised in the scoping decision.

### **III. Route Permit Criteria**

The Commission's route permit determinations are guided by Minnesota's "goals to conserve resources, minimize environmental impacts, minimize human settlement and other land use

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<sup>2</sup> Minn. Stat. § 216E.04, subd. 5.

conflicts, and ensure the state's electric energy security through efficient, cost-effective power supply and electric transmission infrastructure.”<sup>3</sup>

Minn. Stat. § 216E.03 contains a non-exclusive list of factors for the Commission to consider in evaluating a route permit:

- (1) evaluation of research and investigations relating to the effects on land, water and air resources of large electric power generating plants and high-voltage transmission lines and the effects of water and air discharges and electric and magnetic fields resulting from such facilities on public health and welfare, vegetation, animals, materials and aesthetic values, including baseline studies, predictive modeling, and evaluation of new or improved methods for minimizing adverse impacts of water and air discharges and other matters pertaining to the effects of power plants on the water and air environment;
- (2) environmental evaluation of sites and routes proposed for future development and expansion and their relationship to the land, water, air and human resources of the state;
- (3) evaluation of the effects of new electric power generation and transmission technologies and systems related to power plants designed to minimize adverse environmental effects;
- (4) evaluation of the potential for beneficial uses of waste energy from proposed large electric power generating plants;
- (5) analysis of the direct and indirect economic impact of proposed sites and routes including, but not limited to, productive agricultural land lost or impaired;
- (6) evaluation of adverse direct and indirect environmental effects that cannot be avoided should the proposed site and route be accepted;
- (7) evaluation of alternatives to the applicant's proposed site or route proposed pursuant to subdivisions 1 and 2;
- (8) evaluation of potential routes that would use or parallel existing railroad and highway rights-of-way;
- (9) evaluation of governmental survey lines and other natural division lines of agricultural land so as to minimize interference with agricultural operations;

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<sup>3</sup> Minn. Stat. § 216E.03, subd. 7(a).

(10) evaluation of the future needs for additional high-voltage transmission lines in the same general area as any proposed route, and the advisability of ordering the construction of structures capable of expansion in transmission capacity through multiple circuiting or design modifications;

(11) evaluation of irreversible and irretrievable commitments of resources should the proposed site or route be approved; and

(12) when appropriate, consideration of problems raised by other state and federal agencies and local entities.<sup>4</sup>

The Commission must also make specific findings that it has considered locating a route for a high-voltage transmission line on an existing high-voltage transmission route and the use of parallel existing highway right-of-way and, to the extent those are not used for the route, the commission must state the reasons.<sup>5</sup>

Minn. R. 7850.4100 requires that the Commission also consider the following factors:

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

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<sup>4</sup> Minn. Stat. § 216E.03, subd. 7(b).

<sup>5</sup> *Id.*, subd. 7(e).

- J. use of existing transportation, pipeline, and electrical transmission systems or rights-of-way;
- K. electrical system reliability;
- L. costs of constructing, operating, and maintaining the facility which are dependent on design and route;
- M. adverse human and natural environmental effects which cannot be avoided; and
- N. irreversible and irretrievable commitments of resources.

#### **IV. ALJ Report**

The ALJ held an in-person public hearing in St. Joseph on May 17, 2023, and held a remote public hearing via WebEx on May 18, 2023. At the in-person public hearing, two individuals asked about the land acquisition process for the Project, and GRE provided responses. There were no comments from the public at the remote public hearing.

The Department of Natural Resources (DNR) submitted written comments recommending two special conditions for the route permit regarding dust control and wildlife-friendly erosion control. EERA submitted comments opposing most of GRE's proposed changes to the draft site permit but supporting the change regarding route width variations. EERA proposed special conditions in Section 6 of the route permit regarding an independent third-party monitor, the northern long-eared bat, a vegetation management plan, and coordination with the Cities of St. Joseph and St. Cloud. GRE did not oppose EERA's special conditions but recommended an amendment to the vegetation management plan condition recognizing landowner preference. EERA responded that landowner preference is appropriate as a vegetation management goal but not as a permit condition.

The ALJ recommended that the Commission issue GRE a route permit for the proposed route to construct and operate the Project and associated facilities in Stearns County, and that the permit include the recommended draft permit conditions set forth in the ALJ Report.

The ALJ Report is well-reasoned, comprehensive, and thorough. The Commission has examined the record and concurs with the ALJ's findings, conclusions, and recommendations, and will therefore adopt the ALJ Report consistent with the decisions herein.

#### **V. Route Permit Issuance**

The Project would rebuild and upgrade an existing transmission line in its current right-of-way for nearly the entire route and therefore satisfies Minn. Stat. § 216E.03, subd. 7(e). By increasing the voltage to 115 kV, the Project will improve service reliability and resiliency in the area. The Commission agrees with the ALJ that a route permit should be issued for the proposed route. The Commission also concurs with the ALJ's recommended special conditions. The Commission will therefore issue the attached route permit for the Project.

## ORDER

1. The Commission adopts the Administrative Law Judge Report to the extent it is consistent with the Commission's final decisions.
2. The Commission find that the environmental assessment and the record created at the public hearing address the issues identified in the scoping decision.
3. The Commission issues the attached route permit that identifies the route proposed by Great River Energy for its 115-kV St. Joseph Area Transmission Line Project that includes specific requirements and conditions.
4. The Commission authorizes Commission staff to modify the ALJ Report and the proposed route permit to correct typographic and formatting errors, improve consistency, and ensure agreement with the Commission's final order in this matter.
5. This order shall become effective immediately.

BY ORDER OF THE COMMISSION



Will Seuffert  
Executive Secretary



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**STATE OF MINNESOTA PUBLIC UTILITIES COMMISSION**

**ROUTE PERMIT FOR A**

**HIGH-VOLTAGE TRANSMISSION LINE AND ASSOCIATED FACILITIES**

**IN**

**STEARNS COUNTY**

**ISSUED TO**

**GREAT RIVER ENERGY**

**PUC DOCKET NO. ET2/TL-22-235**

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

**Great River Energy**

Great River Energy is authorized by this route permit to construct and operate approximately 3.2 miles of 115-kilovolt (kV) transmission line and associated facilities in St. Joseph Township, the City of St. Joseph, and St. Wendell Township in Stearns County, Minnesota.

The high-voltage transmission line and associated facilities shall be built within the route identified in this permit and as portrayed on the route maps and in compliance with the conditions specified in this permit.

Approved and adopted this 23rd day of October, 2023

BY ORDER OF THE COMMISSION



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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 permit authorizes the Great River Energy to construct and operate an approximately 3.2 mile 115-kilovolt (kV) transmission line and associated facilities in St. Joseph Township, the City of St. Joseph, and St. Wendell Township in Stearns County, Minnesota (Project), and as identified in the attached Route Maps, hereby incorporated into this document as Attachment 3.

### 1.1 Pre-emption

Pursuant to Minn. Stat. § 216E.10, this permit shall be the sole route approval required to be obtained by the Permittee for construction of the transmission facilities and this 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 PROJECT DESCRIPTION

The Project includes: (1) construction of approximately 3.2 miles of 115-kV transmission line and structures between the existing West St. Cloud, Westwood, and Le Sauk Substations; (2) extension of the transmission line approximately 170 feet northwesterly near the existing Le Sauk Substation to tap into a new 115-kV switch on Great River Energy's existing ST-FPT transmission line; (3) installation of an additional 115-kV breaker and associated equipment at the existing West St. Cloud Substation, which will require an approximately 6,500-square-foot expansion of the substation; and (4) installation of two 115-kV line switches: one for the tap feeding the existing Westwood Substation, and one north of the existing Le Sauk Substation.

### 2.1 Project Location

The Project is located entirely in Stearns County, Minnesota, in the City of St. Joseph, the Township of St. Joseph and a small section of St. Wendell Township.

County	City/Township Name	Township	Range	Section
Stearns	St. Joseph Township	124N	29W	12
Stearns	City of St. Joseph	124N	29W	1, 12
Stearns	St. Wendell Township	125N	29W	36

## 2.2 Substations and Associated Facilities

Substations and associated facilities include installation of:

- An additional 115-kV breaker and associated equipment at the existing West St. Cloud Substation, which will require an approximately 6,500-square-foot expansion of the substation;
- Two 115-kV line switches: one for the tap feeding the existing Westwood Substation, and one north of the existing Le Sauk Substation.

## 2.3 Structures

Most of the rebuilt 115-kV line will consist of single circuit, monopole wood structures spaced approximately 300 to 400 feet apart. Transmission structures will typically range in height from 70 to 90 feet above ground, depending upon the terrain and environmental constraints. The average diameter of the wood structures at ground level is 20 inches.

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

Structure Type	Material	Approximate Height Above Ground (feet)	Structure Base Diameter (inches)	Span Between Distances (feet)
Monopole with horizontal post or braced post	Wood, steel or ductile iron	70 - 90	18 - 36	300 – 400
H-Frame	Wood, steel or ductile iron	40 - 60	18 - 60	300 - 400
Dead-end	Wood, steel	70 - 90	18 - 60	300 - 400

Laminated wood structures or steel structures may be needed for switches and angled structures; the size of these structures is dependent on the weight of the switch material, the tension on the line, and/or the angle of deflection the pole location causes on the transmission line.

Multi-pole (3-pole dead-end) and/or H-frame structures may be used to cross underneath the existing Xcel Energy 115-kV line located between Ridgewood Road and 304th Street.

## **2.4 Conductors**

The three single-conductor phase wires will be 795 ACSS (Aluminum Conductor Steel Supported) or a conductor of similar capacity. A shield wire will be installed above the conductors for lightning protection.

## **3 DESIGNATED ROUTE**

The route designated by the Commission in this permit is the route described below and shown on the Route Maps in Attachment 3 of this permit. The route is generally described as follows:

The designated route exits the West St. Cloud substation and runs east on Ridgewood Road for approximately one-half mile to an upgraded switch and tap line for Stearns Electric Association's Westwood Substation. From the Westwood Substation, the designated route continues east for 1,100 feet along Ridgewood Road before turning north for approximately 1.4 miles to Mullen Road, then westerly along Mullen Road for approximately 0.9 miles where the existing 69-kV line terminates along County State Aid Highway (CSAH) 133. The 115-kV line will then extend approximately 170 feet northwest on new ROW, crossing over Mullen Road and CSAH 133, to a new switch pole on Great River Energy's existing ST-FPT 115-kV line.

The final alignment must be located within this designated route. The identified route widths on the attached route maps provide the Permittee with flexibility for minor adjustments of the alignment or right-of-way to accommodate landowner requests and unforeseen conditions. The final alignment (i.e., permanent and maintained rights-of-way) will be located within this designated route unless otherwise authorized by this permit or the Commission.

## **4 RIGHT-OF-WAY**

This 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 35 feet on both sides of the transmission line measured from its centerline. If guy wires are needed to support a structure, a 200-foot box right-of-way around such structures to accommodate guy wires and anchors are authorized.

The Project's anticipated alignment is intended to minimize potential impacts relative to criteria identified in Minn. R. 7850.4100. The actual right-of-way will 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 permit.

Any right-of-way modifications within the designated route shall be located to have comparable overall impacts relative to the factors in Minn. R. 7850.4100, as does the right-of-way identified in this permit, and shall be specifically identified, documented and approved as part of the plan and profile submitted pursuant to Section 9.1 of this 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 permit; and for highways under the jurisdiction of the Minnesota Department of Transportation, the procedures for accommodating utilities in trunk highway rights-of-way.

#### **4.1 ROUTE WIDTH VARIATIONS**

Route width variations may be allowed to accommodate the potential site-specific constraints listed below. These constraints may arise from any of the following:

1. Unforeseen circumstances encountered during the detailed engineering and design process.
2. Federal or state agency requirements.
3. Existing infrastructure within the route, including but not limited to railroads, natural gas and liquid pipelines, high voltage electric transmission lines, or sewer and water lines.

Any alignment modifications arising from these site-specific constraints that would result in right-of-way placement outside of the designated route shall be specifically reviewed by the Commission under Minn. R. 7850.4900.

### **5 GENERAL CONDITIONS**

The Permittee shall comply with the following conditions during construction and operation of the transmission line and associated facilities over the life of this permit.

#### **5.1 Permit Distribution**

Within 30 days of permit issuance, the Permittee shall provide all affected landowners with a copy of this permit and the complaint procedures. In no case shall the landowner receive this route permit and complaint procedures less than five days prior to the start of construction on their property. An affected landowner is any landowner or designee that is within or adjacent to the permitted route.

At the time of first contact, the Permittee shall also provide all affected landowners with a copy of the Department of Commerce's Rights-of-Way and Easements for Energy Facility Construction and Operation fact sheet.<sup>1</sup>

## **5.2 Access to Property**

The Permittee shall notify landowners or their designee at least 14 days in advance but not greater than 60 days in advance of entering the property, unless otherwise negotiated with the affected landowner.

## **5.3 Construction and Operation Practices**

The Permittee shall follow those specific construction practices and material specifications described in Great River Energy's Application for a route permit for the Rebuild of Existing 69-kV ST-WW Transmission Line to 115-kV, dated August 25, 2022, and the record of the proceedings unless this permit establishes a different requirement in which case this permit shall prevail.

### **5.3.1 Field Representative**

The Permittee shall designate a field representative responsible for overseeing compliance with the conditions of this permit during construction of the project. 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 14 days prior to commencing construction. The Permittee shall provide the field representative's contact information to affected landowners, residents, local government units and other interested persons 14 days prior to commencing construction. The Permittee may change the field representative at any time upon notice to the Commission, affected landowners, residents, local government units and other interested persons.

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<sup>1</sup> [http://mn.gov/commerce/energyfacilities/documents/Easements%20Fact%20Sheet\\_08.05.14.pdf](http://mn.gov/commerce/energyfacilities/documents/Easements%20Fact%20Sheet_08.05.14.pdf)

### **5.3.2 Employee Training and Education of Permit Terms and Conditions**

The Permittee shall inform and educate all employees, contractors, and other persons involved in the construction and ongoing operation of the transmission line of the terms and conditions of this permit.

### **5.3.3 Public Services, Public Utilities, and Existing Easements**

During construction, the Permittee shall minimize any disruption to public services or public utilities. To the extent disruptions to public services or public utilities do occur these occurrences will be temporary, and the Permittee will restore service promptly. Where any impacts to utilities have the potential to occur the Permittee will work with both landowners and local agencies to determine the most appropriate transmission structure placement.

The Permittee shall consult with landowners, townships, cities, and counties along the route and consider concerns regarding tree clearing, distance from existing structures, drain tiles, pole depth and placement in relationship to existing roads and road expansion plans.

The Permittee shall cooperate with county and city road authorities to develop appropriate signage and traffic management during construction.

### **5.3.4 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. Temporary easements outside of the authorized transmission line right-of-way will be obtained from affected landowners through rental agreements and are not provided for in this permit.

Temporary driveways may be constructed between the roadway and the structures to minimize impact using the shortest route possible. Construction mats should be used to minimize impacts on access paths and construction areas.

### **5.3.5 Noise**

The Permittee shall comply with noise standards established under Minn. R. 7030.0010 to 7030.0080. Construction and maintenance activities shall be limited to daytime working hours to the extent practicable to ensure nighttime noise level standards will not be exceeded.

### **5.3.6 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. Care shall be used to preserve the natural landscape, minimize tree removal and prevent any unnecessary destruction of the natural surroundings in the vicinity of the project 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. Structures shall be placed at a distance, consistent with sound engineering principles and system reliability criteria, from intersecting roads, highways, or trail crossings.

### **5.3.7 Soil Erosion and Sediment Control**

The Permittee shall implement those erosion prevention and sediment control practices recommended by the Minnesota Pollution Control Agency Construction Stormwater Program.

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 facilities shall be returned to pre-construction conditions.

In accordance with Minnesota Pollution Control Agency requirements, the Permittee shall obtain a National Pollutant Discharge Elimination System (NPDES)/State Disposal System (SDS) Construction Stormwater permit from the Minnesota Pollution Control Agency.

### **5.3.8 Wetlands and Water Resources**

Wetland impact avoidance measures that shall be implemented during the design and construction of the transmission line and will include spacing and placing of power poles at variable distances to span and avoid wetlands, watercourses, and floodplains. Unavoidable wetland impacts because of the placement of poles shall be limited to the immediate area around the poles. To minimize impacts, construction in wetland areas shall occur during frozen ground conditions where practicable and shall be according to permit requirements by the



applicable permitting authority. When construction during winter is not possible, wooden, or composite mats shall be used to protect wetland vegetation. Soil excavated from the wetlands and riparian areas shall be contained and not placed back into the wetland or riparian area. Wetlands and riparian areas shall be accessed using the shortest route possible to minimize travel through wetland areas and prevent unnecessary impacts. No staging or stringing set up areas shall be placed within or adjacent to wetlands or water resources, as practicable. Power pole structures shall be assembled on upland areas before they are brought to the site for installation.

Areas disturbed by construction activities shall be restored to pre-construction conditions. Restoration of the wetlands will be performed by the Permittee in accordance with the requirements of applicable state and federal permits or laws and landowner agreements.

All requirements of the U.S. Army Corps of Engineers (wetlands under federal jurisdiction), Minnesota Department of Natural Resources (Public Waters/Wetlands), and affected Counties (wetlands under the jurisdiction of the Minnesota Wetland Conservation Act) shall be met.

#### **5.3.9 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.

Tall growing species located within the transmission line right-of-way that endanger the safe and reliable operation of the transmission facility will be removed by the Permittee. 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 will not pose a threat to the transmission facility or impede construction.

#### **5.3.10 Application of Pesticides**

The Permittee shall restrict pesticide use to those pesticides and methods of application approved by the Minnesota Department of Agriculture, Minnesota Department of Natural Resources, and the U.S. Environmental Protection Agency. 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 or designee to obtain approval for the use of pesticide at least 14 days prior to any application on their property. The landowner may request that there be no application of pesticides on any part of the site within the landowner's property. The Permittee shall provide notice of pesticide application to affected landowners and known beekeepers operating apiaries within three miles of the project site at least 14 days prior to such application.

#### **5.3.11 Invasive Species**

The Permittee shall employ best management practices to avoid the potential spread of invasive species on lands disturbed by project construction activities.

#### **5.3.12 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 consult with landowners on the selection and use of seed for replanting.

#### **5.3.13 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 project. Where practical, existing roadways shall be used for all activities associated with construction of the facility. Oversize or overweight loads associated with the facility shall not be hauled across public roads without required permits and approvals.

The Permittee shall construct the least number of site access roads as possible. 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.

#### **5.3.14 Archaeological and Historic Resources**

The Permittee shall make every effort to avoid impacts to identified archaeological and historic resources when constructing the transmission facility. If a resource is encountered, the Permittee shall contact and 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 project impacts on the resource consistent with State Historic Preservation Office and State Archaeologist requirements.

Prior to construction, workers shall be trained 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. Construction at such location shall not proceed until authorized by local law enforcement or the State Archaeologist.

#### **5.3.15 Avian Protection**

The Permittee in cooperation with the Minnesota Department of Natural Resources shall identify areas of the project 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.

#### **5.3.16 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 line. 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 advise the Commission in writing of the completion of such activities.

### **5.3.17 Cleanup**

All waste and scrap that is the product of construction shall be removed from the right-of-way and all premises on which construction activities were conducted and properly disposed of upon completion of each task. Personal litter, including bottles, cans, and paper from construction activities shall be removed daily.

### **5.3.18 Pollution and Hazardous Wastes**

All appropriate precautions to protect against pollution of the environment must be taken by the Permittee. The Permittee shall be responsible for compliance with all laws applicable to the generation, storage, transportation, clean up and disposal of all wastes generated during construction and restoration of the right-of-way.

### **5.3.19 Damages**

The Permittee shall restore or fairly compensate landowners for damage to crops, fences, private roads and lanes, landscaping, drain tile, or other damages sustained during construction.

## **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 transmission line shall be designed, constructed, and operated 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 line, 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 line.

### **5.5 Other Requirements**

#### **5.5.1 Safety Codes and Design Requirements**

The transmission line and associated facilities shall be designed 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 rules and statutes. The Permittee shall obtain all required permits for the project and comply with the conditions of those permits unless those permits conflict with or are preempted by federal or state permits and regulations. A list of the permits known to be required is included in the permit application. The Permittee shall submit a copy of such permits to the Commission upon request.

## **6 SPECIAL CONDITIONS**

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

### **6.1 Independent Third-Party Monitor**

Prior to any construction, the Permittee shall propose a scope of work and identify an independent third-party monitor to conduct Project 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.

The Permittee shall file with the Commission the scope of work and the name, address, email, and telephone number of the third party-monitor at least 30 days prior to commencing any construction or right-of-way preparation and upon any change in contact information that may occur during construction of the Project and restoration of the right-of-way.

### **6.2 Northern Long-Eared Bat**

The Permittee will coordinate with the U.S. Fish and Wildlife Service regarding the timing of tree-clearing and any other construction or restoration actions that may impact Northern Long-Eared Bat in vicinity of the project.

### **6.3 Vegetation Management Plan**

Permittee shall develop a vegetation management plan in coordination with EERA and DNR. The vegetation management plan and documentation of the coordination efforts between the permittee and the coordinating agencies shall be filed at least 14 days prior to the plan and profile for the project. The Permittee shall provide all affected landowners with copies of the plan.

The vegetation management plan must include the following:

- Management objectives addressing short term (seeding and establishment) and long-term goals (life of the project).
- A description of planned restoration and vegetation management activities, including how the site will be prepared, timing of activities, how seeding will occur (broadcast, drilling, etc.), and the types of seed mixes to be used.
- A description of tree removal/planting activities and the timing of such activities.
- A description of how the site will be monitored and evaluated to meet management goals.

- A description of the management tools used to maintain vegetation (*e.g.*, mowing, spotspraying, hand removal, fire, grazing, etc.), including the timing and frequency of maintenance activities.

#### **6.4 Coordination with Cities of St. Joseph and St. Cloud**

At least 30 days prior to commencing construction, Great River Energy shall file documentation of the coordination regarding the Project which has occurred after the issuance of the route permit with the City of St. Joseph, the City of St. Cloud, and St. Wendell Township.

#### **6.5 Dust Control**

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

#### **6.6 Wildlife-Friendly Erosion Control**

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

### **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 permit the Permittee shall file a report on the failure to construct and the Commission shall consider suspension of the permit in accordance with Minn. R. 7850.4700.

### **8 COMPLAINT PROCEDURES**

Prior to the start of construction, the Permittee shall submit to the Commission the procedures that will be used to receive and respond to complaints. The 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 permit.

Upon request, the Permittee shall assist the Commission 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 permit is a failure to comply with the conditions of this permit. Compliance filings must be electronically filed with the Commission.

### **9.1 Plan and Profile**

At least 30 days before right-of-way preparation for construction begins on any segment or portion of the project, the Permittee shall provide the Commission 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 line. 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 permit.

The Permittee may not commence construction until the 30 days has expired or until the Commission has advised the Permittee in writing that it has completed its review of the documents and determined that the planned construction is consistent with this 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 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 permit.

### **9.2 Status Reports**

The Permittee shall report to the Commission on progress during finalization of the route, design of structures, and construction of the transmission line. The Permittee need not report more frequently than monthly. Reports shall begin with the submittal of the plan and profile for the project and continue until completion of restoration.

### **9.3 Notification to Commission**

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



#### **9.4 As-Builts**

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

#### **9.5 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 line and each substation connected.

#### **9.6 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.
- (d) To examine and copy any documents pertaining to compliance with the conditions of this route permit.

### **10 PERMIT AMENDMENT**

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

### **11 TRANSFER OF PERMIT**

The Permittee may request at any time that the Commission transfer this permit to another person or entity. The Permittee shall provide the name and description of the person or entity

to whom the permit is requested to be transferred, the reasons for the transfer, a description of the facilities affected, and the proposed effective date of the transfer.

The person to whom the permit is to be transferred shall provide the Commission with such information as the Commission shall require to determine whether the new Permittee can comply with the conditions of the permit. The Commission may authorize transfer of the permit after affording the Permittee, the new Permittee, and interested persons such process as is required.

## **12 REVOCATION OR SUSPENSION OF THE PERMIT**

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

**ATTACHMENT 1**

**Complaint Handling Procedures for Permitted Energy Facilities**

**MINNESOTA PUBLIC UTILITIES COMMISSION  
COMPLAINT HANDLING PROCEDURES FOR  
PERMITTED ENERGY FACILITIES**

**A. Purpose**

To establish a uniform and timely method of reporting and resolving complaints received by the permittee concerning permit conditions for site or route preparation, construction, cleanup, restoration, operation, and maintenance.

**B. Scope**

This document describes complaint reporting procedures and frequency.

**C. Applicability**

The procedures shall be used for all complaints received by the permittee and all complaints received by the Minnesota Public Utilities Commission (Commission) under Minn. R. 7829.1500 or Minn. R. 7829.1700 relevant to this permit.

**D. Definitions**

**Complaint:** A verbal or written statement presented to the permittee by a person expressing dissatisfaction or concern regarding site or route preparation, cleanup or restoration, or other permit conditions. Complaints do not include requests, inquiries, questions or general comments.

**Substantial Complaint:** A written complaint alleging a violation of a specific permit condition that, if substantiated, could result in permit modification or suspension pursuant to the applicable regulations.

**Unresolved Complaint:** A complaint which, despite the good faith efforts of the permittee and a person, remains unresolved or unsatisfactorily resolved to one or both of the parties.

**Person:** An individual, partnership, joint venture, private or public corporation, association, firm, public service company, cooperative, political subdivision, municipal corporation, government agency, public utility district, or any other entity, public or private; however organized.

## **E. Complaint Documentation and Processing**

1. The permittee shall designate a representative responsible for filing complaints to the Commission's eDocket system. This person's name, phone number and email address shall accompany all complaint submittals. The name and contact information for the representative shall be kept current in eDockets.
2. A person presenting the complaint should, to the extent possible, include the following information in their communications:
  - a. name, address, phone number, and email address;
  - b. initial date of the complaint;
  - c. tract, parcel number, or address of the complaint;
  - d. a summary of the complaint; and
  - e. whether the complaint relates to a permit violation, a construction practice issue, or other type of complaint.
3. The permittee shall document all complaints by maintaining a record of all applicable information concerning the complaint, including the following:
  - a. docket number and project name;
  - b. name of complainant, address, phone number and email address;
  - c. precise description of property or parcel number;
  - d. name of permittee representative receiving complaint and date of receipt;
  - e. nature of complaint and the applicable permit condition(s);
  - f. summary of activities undertaken to resolve the complaint; and
  - g. a statement on the final disposition of the complaint.

## **F. Reporting Requirements**

The permittee shall commence complaint reporting at the beginning of project construction and continue through the term of the permit, unless otherwise required below. The permittee shall report all complaints to the Commission according to the following schedule:

**Immediate Reports:** All substantial complaints shall be reported to the Commission the same day received, or on the following working day for complaints received after working hours. Such reports are to be directed to the Commission's Public Advisor at 1-800-657-3782 (voice messages are acceptable) or [publicadvisor.puc@state.mn.us](mailto:publicadvisor.puc@state.mn.us). For e-mail reporting, the email subject line should read "PUC EFP Complaint" and include the appropriate project docket number.

**Monthly Reports:** During project construction, restoration, and operation, a summary of all complaints, including substantial complaints received or resolved during the preceding month, shall be filed by the 15th of each month to Will Seuffert, Executive Secretary, Public Utilities

Commission, using the eDockets system. The eDockets system is located at: <https://www.edockets.state.mn.us/EFiling/home.jsp>. If no complaints were received during the preceding month, the permittee shall file a summary indicating that no complaints were received.

If a project has submitted twelve consecutive months of complaint reports with no complaints, monthly reports can terminate by a letter to eDockets notifying the Commission of such action. If a substantial complaint is received (by the company or the Commission) following termination of the monthly complaint report, as noted above, the monthly reporting should commence for a period of one year following the most recent complaint or upon resolution of all pending complaints.

If a permittee is found to be in violation of this section, the Commission may reinstate monthly complaint reporting for the remaining permit term or enact some other commensurate requirement via notification by the Executive Secretary or some other action as decided by the Commission.

#### **G. Complaints Received by the Commission**

Complaints received directly by the Commission from aggrieved persons regarding the permit or issues related to site or route preparation, construction, cleanup, restoration, or operation and maintenance will be promptly sent to the permittee.

The permittee shall notify the Commission when the issue has been resolved. The permittee will add the complaint to the monthly reports of all complaints. If the permittee is unable to find resolution, the Commission will use the process outlined in the Unresolved Complaints Section to process the issue.

#### **H. Commission Process for Unresolved Complaints**

Complaints raising substantial and unresolved permit issues will be investigated by the Commission. Staff will notify the permittee and appropriate persons if it determines that the complaint is a substantial complaint. With respect to such complaints, the permittee and complainant shall be required to submit a written summary of the complaint and its current position on the issues to the Commission. Staff will set a deadline for comments. As necessary, the complaint will be presented to the Commission for consideration.

#### **I. Permittee Contacts for Complaints and Complaint Reporting**

Complaints may be filed by mail or email to the permittee's designated complaint representative, or to the Commission's Public Advisor at 1-800-657-3782 or [publicadvisor.puc@state.mn.us](mailto:publicadvisor.puc@state.mn.us). The name and contact information for the permittee's designated complaint representative shall be kept current in the Commission's eDocket system.

## **ATTACHMENT 2**

### **Compliance Filing Procedures for Permitted Energy Facilities**

**MINNESOTA PUBLIC UTILITIES COMMISSION  
COMPLIANCE FILING PROCEDURE FOR  
PERMITTED ENERGY FACILITIES**

**A. Purpose**

To establish a uniform and timely method of submitting information required by Commission energy facility permits.

**B. Scope and Applicability**

This procedure encompasses all known compliance filings required by permit.

**C. Definitions**

**Compliance Filing:** A filing of information to the Commission, where the information is required by a Commission site or route permit.

**D. Responsibilities**

1. The Permittee shall file all compliance filings with Will Seuffert, Executive Secretary, Public Utilities Commission, through the eDockets system. The eDockets system is located at:  
<https://www.edockets.state.mn.us/EFiling/home.jsp>

General instructions are provided on the eDockets website. Permittees must register on the website to file documents.

2. All filings must have a cover sheet that includes:
  - a. Date
  - b. Name of submitter/permittee
  - c. Type of permit (site or route)
  - d. Project location
  - e. Project docket number
  - f. Permit section under which the filing is made
  - g. Short description of the filing



3. Filings that are graphic intensive (e.g., maps, engineered drawings) must, in addition to being electronically filed, be submitted as paper copies and on CD. Paper copies and CDs should be sent to: 1) Will Seuffert, Executive Secretary, Minnesota Public Utilities Commission, 121 7th Place East, Suite 350, St. Paul, MN 55101-2147, and 2) Department of Commerce, Energy Environmental Review and Analysis, 85 7th Place East, Suite 500, St. Paul, MN 55101-2198.

The Commission may request a paper copy of any electronically filed document.

## PERMIT COMPLIANCE FILINGS<sup>1</sup>

PERMITTEE: Great River Energy

PERMIT TYPE: High-Voltage Transmission Line Route

PROJECT LOCATION: St. Joseph, St. Joseph Township and St. Wendell Township, Stearns County, MN.

PUC DOCKET NUMBER: ET2/TL-22-235

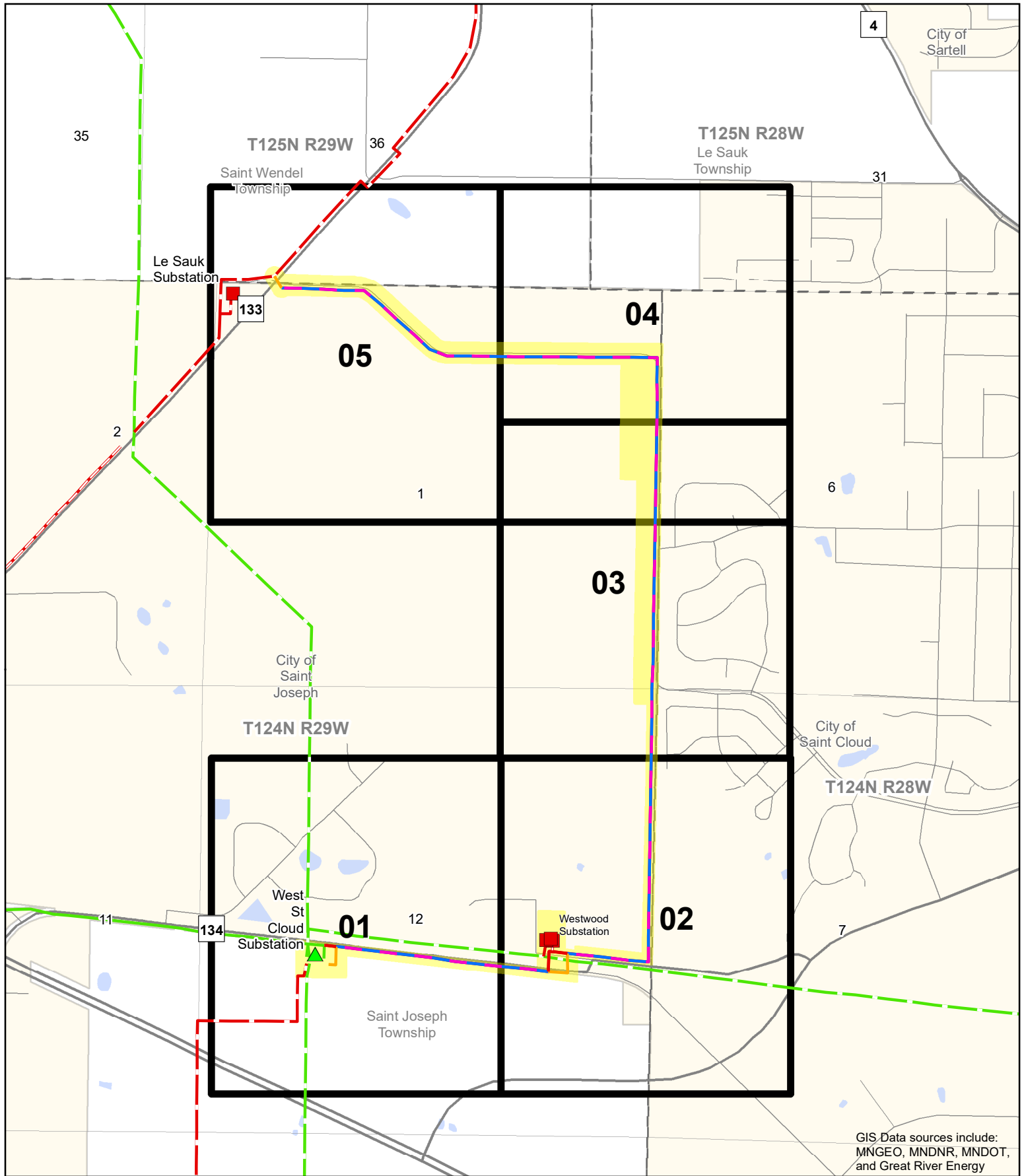
Filing Number	Permit Section	Description of Compliance Filing	Due Date
1.	5.1	Permit Distribution	30 days after permit issuance
2.	5.2	Access to Property	14 days in advance but not more than 60 days
3.	5.3.1	Field Representative	14 days prior to commencing construction
4.	5.3.10	Application of Pesticides	Notice 14 days prior to application
5.	5.3.16	Site Restoration Report	60 days after completion of all restoration activities
6.	5.5.2	List of Other Required Permits	Upon request
7.	6.1	Independent Third-Party Monitor	30 days prior to construction
8.	6.3	Vegetation Management Plan	At least 14 days prior to submitting the plan and profile
9.	6.4	Coordination with St. Joseph and St. Cloud	30 days prior to construction

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<sup>1</sup> This compilation of permit compliance filings is provided for the convenience of the permittee and the Commission. It is not a substitute for the permit; the language of the permit controls.

Filing Number	Permit Section	Description of Compliance Filing	Due Date
10.	7	Delay in Construction	Four years after permit issuance, as necessary
11.	8	Complaint Procedures	Prior to commencing construction
12.	9.1	Plan and Profile	30 days prior to commencing construction
13.	9.2	Status Reports	Monthly through restoration
14.	9.3	Notification to Commission	Three days prior to service
15.	9.4	As-Builts	90 days after construction is complete
16.	9.5	GPS Data	90 days after construction is complete
17.	Complaint Reporting	Monthly Complaint Reports	See Route Permit Attachment 1
18.	Complaint Reporting	Immediate Complaint Reports	By the following day throughout the life of the permit

**ATTACHMENT 3**  
Route Permit Maps



GIS Data sources include:  
MNGEO, MNDNR, MNDOT,  
and Great River Energy

#### Great River Energy

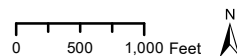
- Proposed 115-kV transmission line replacing existing 69-kV transmission line
- Proposed 115-kV transmission line
- Existing 69-kV transmission line to be removed
- - Existing de-energized 69-kV transmission line
- - Existing 115-kV transmission line

- ▲ Existing transmission substation
- Existing distribution substation
- Project route

#### Non-GRE Transmission

- Existing 69-kV transmission line
- - Existing 115-kV transmission line

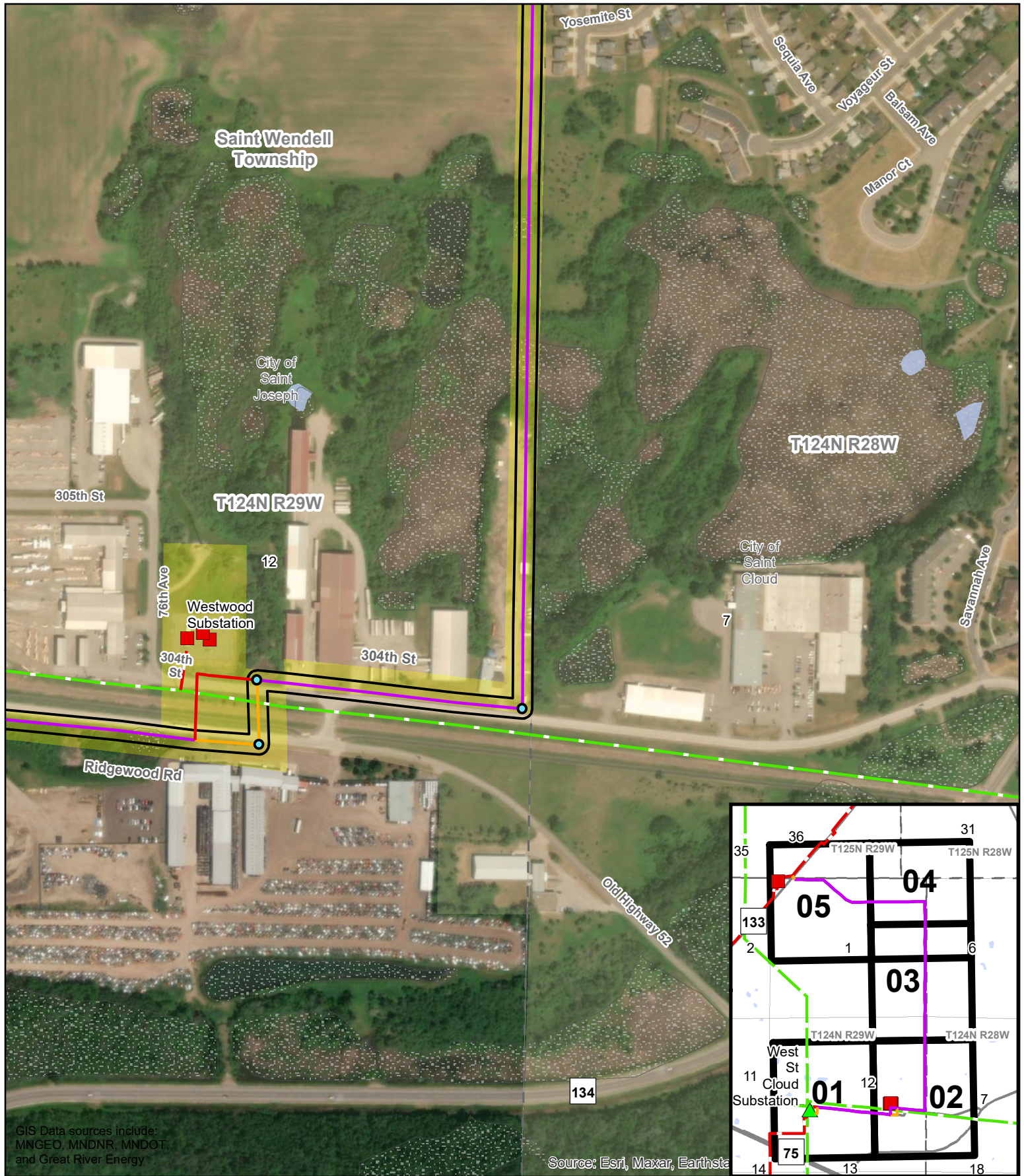
#### ST-WW 69-kV to 115-kV Conversion



**GREAT  
RIVER  
ENERGY**







#### Great River Energy

- Proposed 115-kV transmission line replacing existing 69-kV transmission line
- Proposed 115-kV transmission line
- Existing 69-kV transmission line to be removed
- Existing 115-kV transmission line
- Existing distribution substation
- Potential deadend structure

Project route

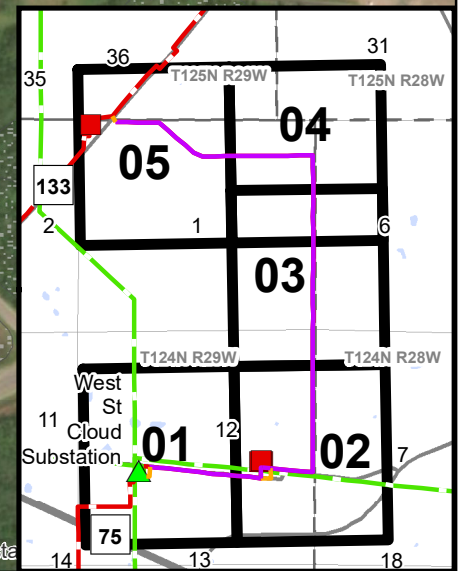
Proposed right-of-way

#### Non-GRE Transmission

— Existing 115-kV transmission line

#### NWI Wetlands

Wetlands



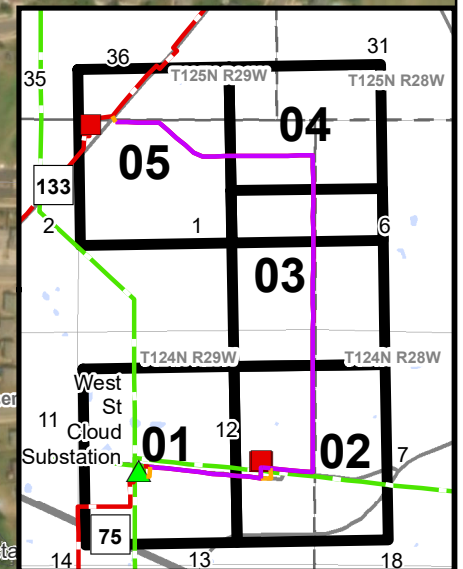
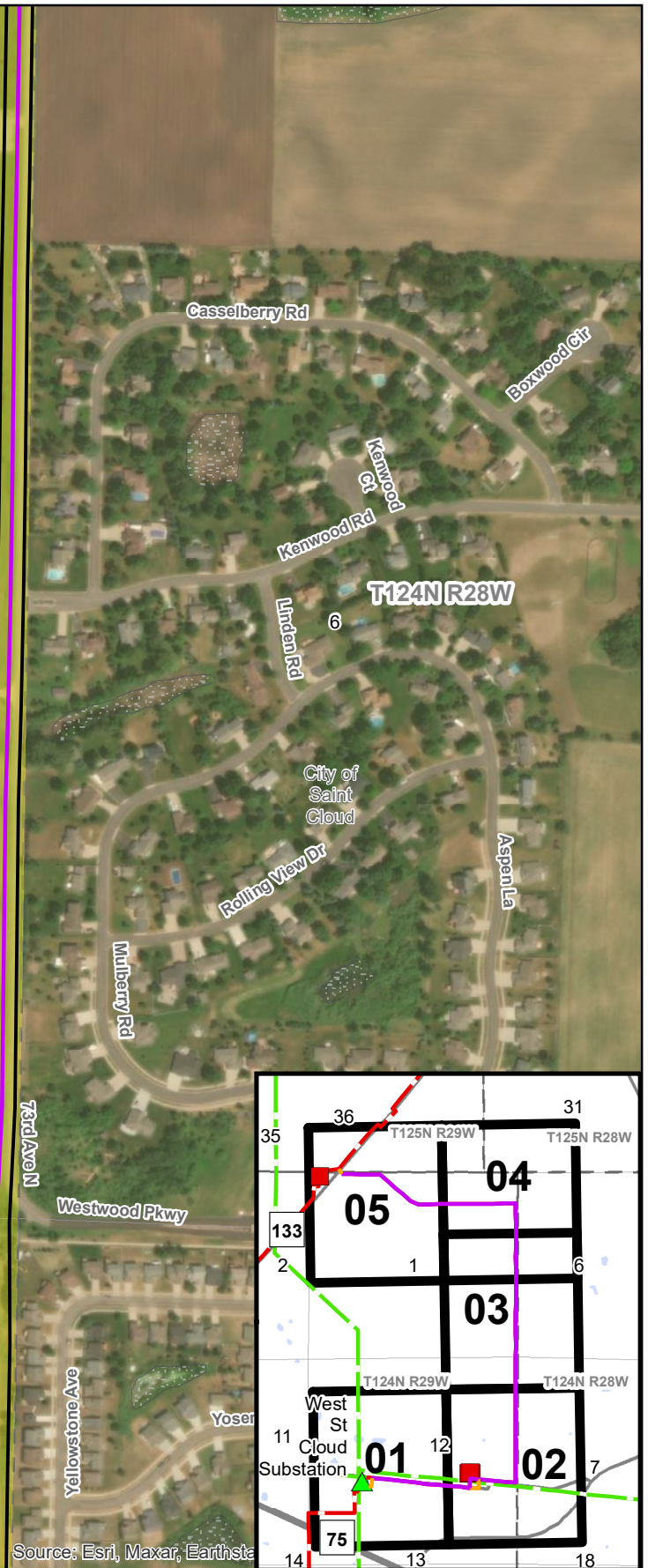
#### ST-WW 69-kV to 115-kV Conversion

Page 2 of 5

0 250 500 Feet







#### Great River Energy

- Proposed 115-kV transmission line replacing existing 69-kV transmission line
- Project route
- Proposed right-of-way

#### NWI Wetlands

- Wetlands

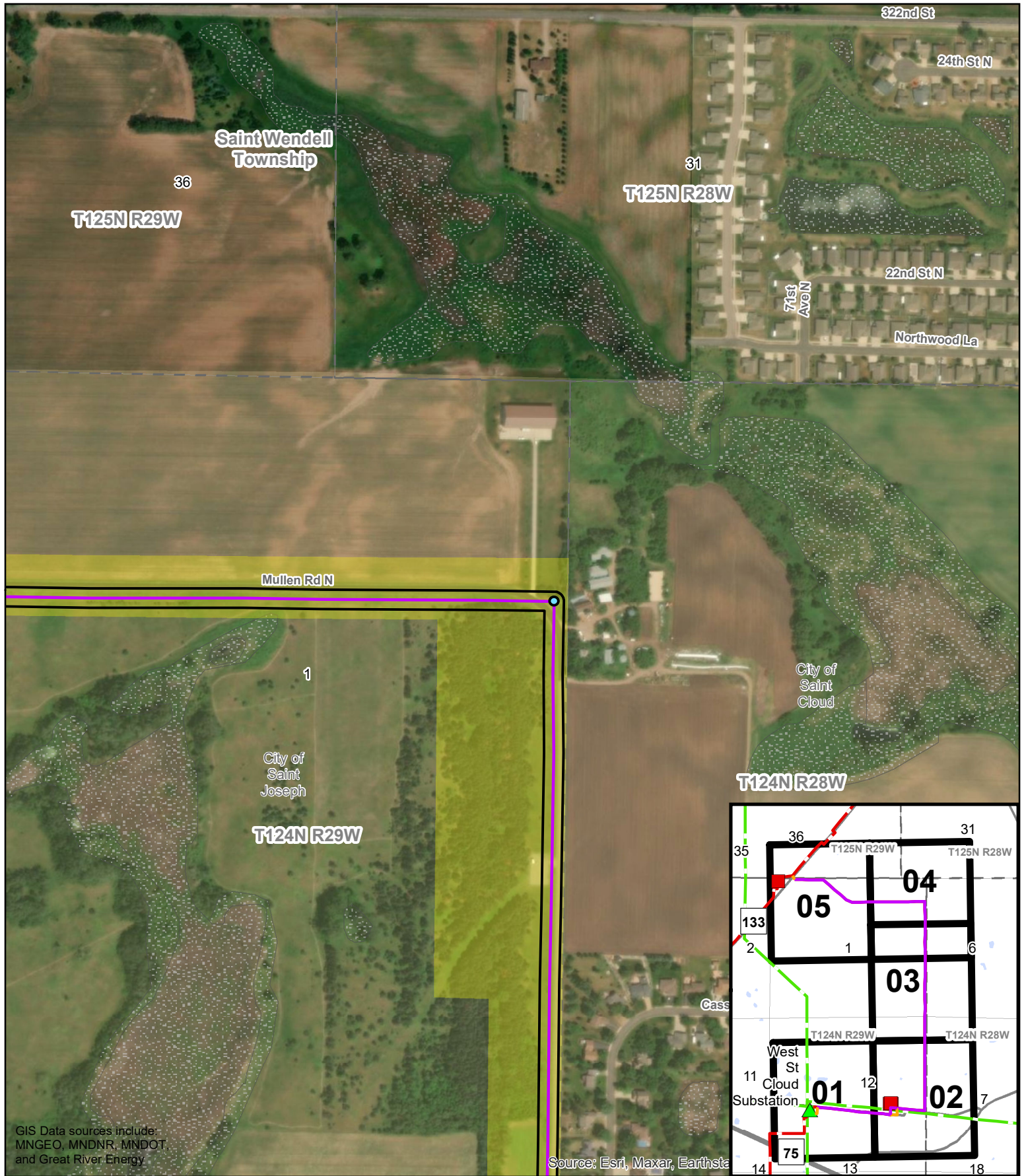
#### ST-WW 69-kV to 115-kV Conversion

Page 3 of 5

0 250 500 Feet







#### Great River Energy

- Proposed 115-kV transmission line replacing existing 69-kV transmission line
- Potential deadend structure
- Project route
- Proposed right-of-way

#### NWI Wetlands

- Wetlands

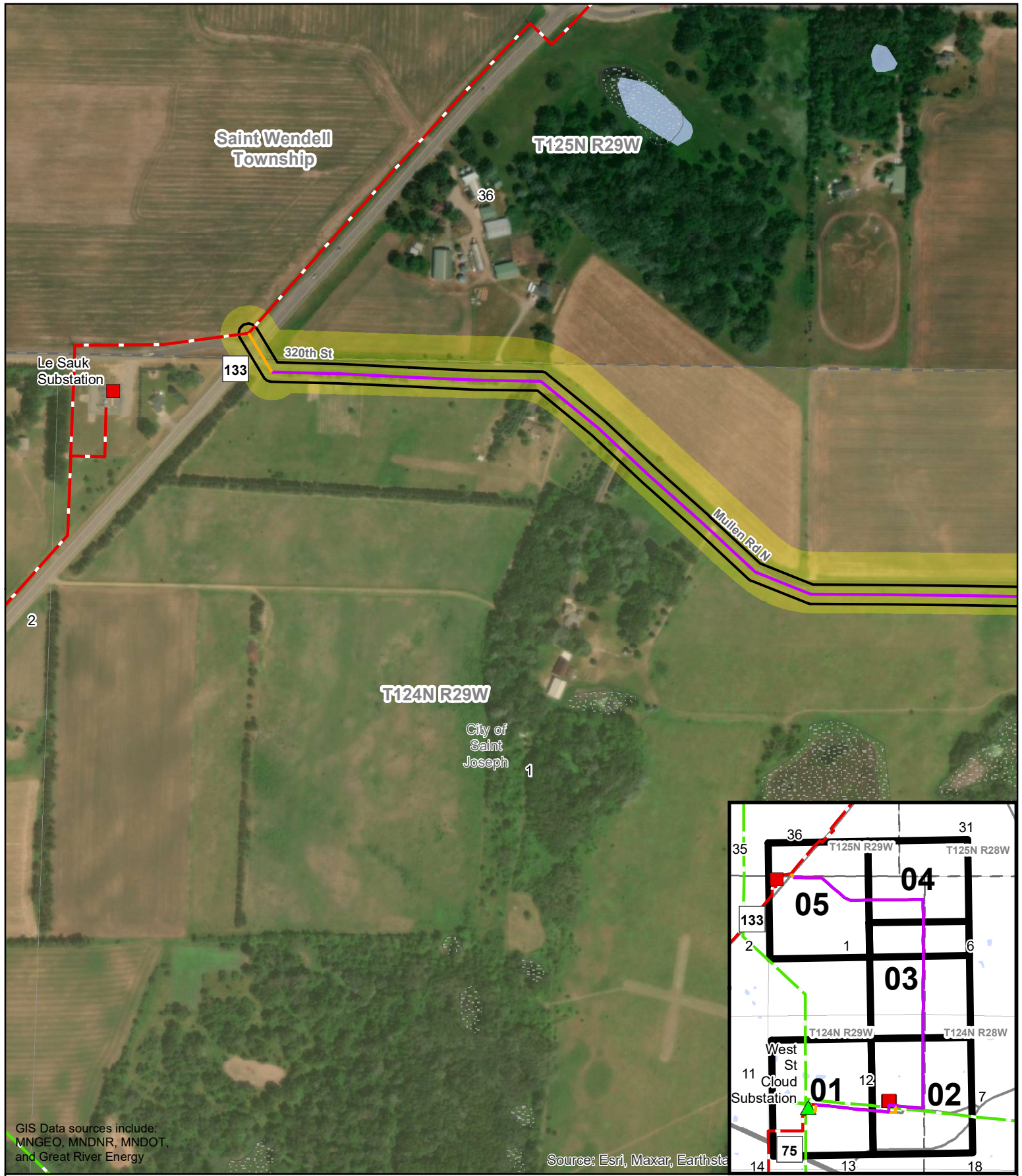
#### ST-WW 69-kV to 115-kV Conversion

Page 4 of 5

0 250 500 Feet







GIS Data sources include:  
MNGEO, MNDNR, MNDOT,  
and Great River Energy

Source: Esri, Maxar, Earthstar

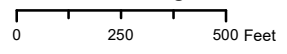
**Great River Energy**

- Proposed 115-kV transmission line replacing existing 69-kV transmission line
- Proposed 115-kV transmission line
- Existing 115-kV transmission line
- Existing distribution substation
- Project route
- Proposed right-of-way

**Non-GRE Transmission**

- Existing 115-kV transmission line
- NWI Wetlands**
- Wetlands

**ST-WW 69-kV to 115-kV Conversion**  
Page 5 of 5



## **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 ADOPTING ADMINISTRATIVE LAW JUDGE REPORT AND ISSUING  
ROUTE PERMIT**

Docket Numbers: **ET-2/TL-22-235**

Dated this **23rd** day of **October, 2023**

/s/ Robin Benson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_22-235_Official List
Richard	Dornfeld	Richard.Dornfeld@ag.state.mn.us	Office of the Attorney General-DOC	Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_22-235_Official List
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_22-235_Official List
Breann	Jurek	bjurek@fredlaw.com	Fredrikson & Byron PA	60 S Sixth St Ste 1500  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-235_Official List
Stacy	Kotch Egstad	Stacy.Kotch@state.mn.us	MINNESOTA DEPARTMENT OF TRANSPORTATION	395 John Ireland Blvd.  St. Paul, MN 55155	Electronic Service	No	OFF_SL_22-235_Official List
Jamie	MacAlister	jamie.macalister@state.mn.us	Department of Commerce	85 7th Place East, Ste. 500  St. Paul, MN 55101	Electronic Service	No	OFF_SL_22-235_Official List
Jenna	Ness	jenna.ness@state.mn.us	Department of Commerce	85 7th place east  St. Paul, MN 55101	Electronic Service	No	OFF_SL_22-235_Official List
Cezar	Panait	Cezar.Panait@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 55101	Electronic Service	No	OFF_SL_22-235_Official List
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_22-235_Official List
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_22-235_Official List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190  Richfield, MN 55423	Electronic Service	Yes	OFF_SL_22-235_Official List
Mark	Strohfus	mstrohfus@greenergy.com	Great River Energy	12300 Elm Creek Boulevard  Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_22-235_Official List
Suzanne	Todnem	suzanne.todnem@state.mn.us	Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul, MN 55164	Electronic Service	Yes	OFF_SL_22-235_Official List
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