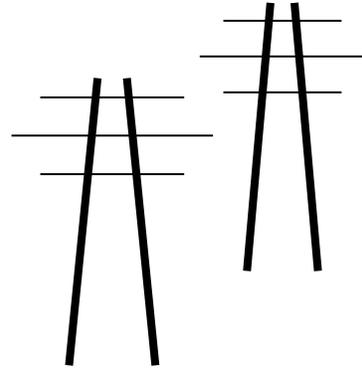


Legalelectric, Inc.

Carol Overland Attorney at Law, MN #254617
Energy Consultant—Transmission, Power Plants, Nuclear Waste
overland@legalelectric.org

1110 West Avenue
Red Wing, Minnesota 55066
612.227.8638



March 3, 2026

Sasha Bergman
Executive Secretary
Public Utilities Commission
121 – 7th Place East
St. Paul, MN 55101

via eFiling only

RE: Reply Comment – Completeness and Process
Donna J. Andersen and Curtis Andersen, and Donna's Acres, LLC
PUC Docket E015/CN-25-109

Dear Ms. Bergman:

On behalf of Donna J. Andersen and Curtis Andersen, attached please find Reply Comment, Certificate of Service, and Notice of Appearance.

Please add to the Commission's email Service List:

Donna J. Andersen
1300 East County Road E
Vadnais Heights, MN 55127

donnajandersen@gmail.com

Thanks for your attention to this matter.

Very truly yours,

Carol A. Overland
Attorney at Law

cc: Donna J. Andersen

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

**Katie J. Sieben
Hwikwon Ham
Audrey C. Partridge
Joseph K. Sullivan
John A. Tuma**

**Chair
Commissioner
Commissioner
Commissioner
Commissioner**

In the Matter of the Application of Minnesota Power, Great River Energy, and Otter Tail Power Company for a Certificate of Need for the Maple River – Cuyuna 345kV Transmission Line Project.

DOCKET No. ET-3,E-002/CN-25-109

**CERTIFICATE OF SERVICE
COMMENT OF
DONNA J. ANDERSEN AND CURTIS ANDERSEN, AND DONNA’S ACRES, LLC**

I, Carol A. Overland, hereby certify that on March 3, 2026, I served a true and correct copy of the Reply Comment of Donna J. Andersen and Curtis Andersen, and Donna’s Acres, LLC, to all persons at the email addresses on the Public Utilities Commission eDockets service list by eFiling and eService.



March 3, 2026

Carol A. Overland MN #254617
Attorney for Donna J. Andersen and Curtis
Andersen and Donna’s Acres, LLC
Legaletric – Overland Law Office
1110 West Avenue
Red Wing, MN 55066
(612) 227-8638
overland@legaletric.org

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

**Katie J. Sieben
Hwikwon Ham
Audrey C. Partridge
Joseph K. Sullivan
John A. Tuma**

**Chair
Commissioner
Commissioner
Commissioner
Commissioner**

In the Matter of the Application of Minnesota Power, Great River Energy, and Otter Tail Power Company for a Certificate of Need for the Maple River – Cuyuna 345kV Transmission Line Project.

DOCKET No. E015, ET2/CN-25-109

NOTICE OF APPEARANCE

DONNA J. ANDERSEN AND CURTIS ANDERSEN, AND DONNA’S ACRES, LLC

Please take notice that the undersigned hereby appear as counsel for Donna J. Andersen and Curtis Andersen, and Donna’s Acres, LLC, in the above-captioned docket. Please serve all further documents and correspondence pertaining to this docket on the following:

Carol A. Overland
Legalelectric
1110 West Avenue
Red Wing, MN 55066

(612) 227-8638
overland@legalelectric.org



March 3, 2026

Carol A. Overland MN #254617
Attorney for Donna J. Andersen and Curtis Andersen, and Donna's Acres, LLC
Legalelectric – Overland Law Office
1110 West Avenue
Red Wing, MN 55066
(612) 27-8638
overland@legalelectric.org

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

| | |
|----------------------------|---------------------|
| Katie J. Sieben | Chair |
| Hwikwon Ham | Commissioner |
| Audrey C. Partridge | Commissioner |
| Joseph K. Sullivan | Commissioner |
| John A. Tuma | Commissioner |

In the Matter of the Application of Minnesota Power, Great River Energy, and Otter Tail Power Company for a Certificate of Need for the Maple River – Cuyuna 345kV Transmission Line Project. DOCKET No. ET-3,E-002/CN-25-109

**REPLY COMMENT OF
DONNA J. ANDERSEN AND CURTIS ANDERSEN, AND DONNA’S ACRES, LLC**

On February 11, 2026, the Public Utilities Commission issued a Notice of Comment Period for the above-captioned Certificate of Need transmission line application.

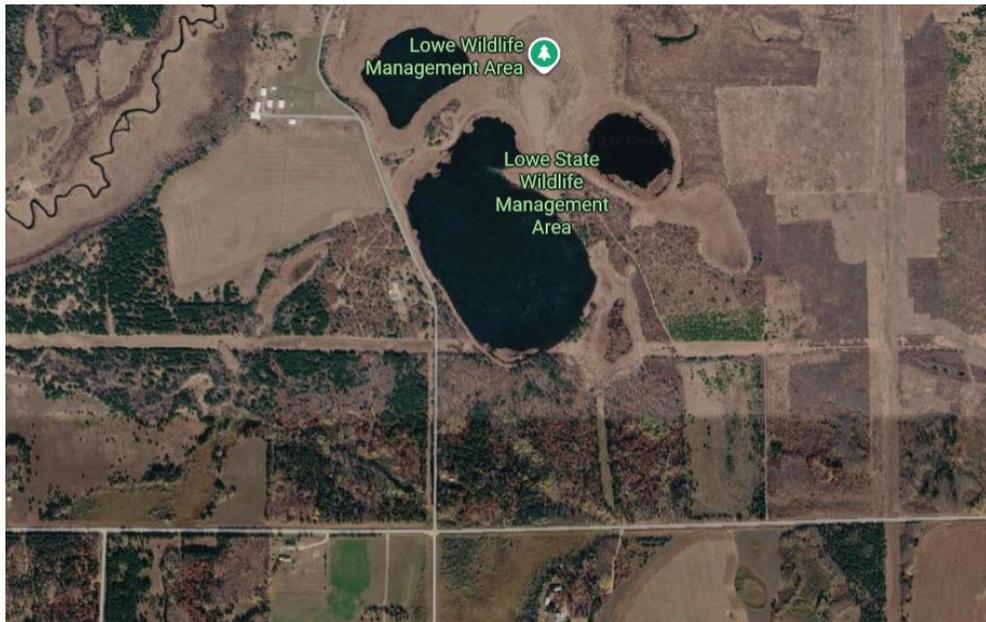
Donna J. Andersen and Curtis Andersen, and Donna’s Acres, LLC, formerly the Donna J. Andersen Trust, Donna J. Andersen, Trustee (hereinafter “Andersen”) filed Initial Comments, and offer the following Reply Comments.

Andersen’s property is on the route proposed in a narrow pinch point¹ surrounded on the east and south sides by roads and the north and south sides by transmission and to the east, a pipeline, and strive to participate in every way possible because of the extreme impacts that this proposed transmission line would have on their painstakingly reforested property through a

¹ Application, Appendix D, p. 15 of 20.

Department of Natural Resources Woodland Stewardship Plan.²

On Google earth, the aerial view shows the Andersen property on the northeast corner of the intersection of Hubbard County Road and the Becker County line; Andersen is below the southern end of Lowe State Wildlife Management Area with a transmission line as shown on that southern edge of the WMA and Andersen property to the south; there is a pipeline to the east; and their home is built near the road separating Hubbard and Becker counties.



The Menahga project³ is a transmission line that was proposed in 2014 and was built in the same corridor as is now proposed for this transmission project, through this pinchpoint encompassing the Andersen property. The Andersen property was rejected as location for that route by the Commission, and it was built in the potato field to the south, across Hubbard County Line Road, the transmission line not yet showing on google earth.

This Maple River to Cuyuna transmission project is again proposed over a corridor including the Andersen property in this pinchpoint that already has two high voltage transmission

² Initial Comment, Attachment A.

³ Menahga Transmission Project, PUC Dockets CN-14-787 and TL-14-797.

lines running east/west to the north and south of Andersens. An alignment through the Andersen property should again be rejected in favor of locating the new 345kV transmission line across Hubbard County Line Road to the south.

In our Initial Comments, it was important to register that the application maps do not show the Andersen property well, if at all.⁴ The Public Outreach Materials have a different set of maps, likely the ones used at utility open houses, and are not referenced in the Application as a source for better maps. Because the Public Outreach materials, specifically maps HU-1, WA-1, and BE-8,⁵ do not show the Andersen property, the maps for the Route Application should do a better job displaying this pinch-point and be incorporated into the body of the Application.⁶

A map is needed that is clearly focused on the Andersen property showing the forest, the WMA, the two transmission lines at the north and south of the Andersen property, and the pipeline to the east – a map showing these features must be entered in the record – the maps in the application have insufficient detail.⁷

The Andersen property was rejected for routing of the Menahga 115kV project. It should be rejected again in favor of the existing transmission corridor on the south side of Hubbard County Road, with a 115kV underbuild, or on the south side of the 115kV transmission line.

I. THE CERTIFICATE OF NEED PROCEEDING IS WHERE SYSTEM ALTERNATIVES ARE TO BE EVALUATED

This Certificate of Need docket is the procedural step where system alternatives are to be

⁴ Application, Appendix D, Detailed maps.

⁵ All in Application, Appendix M Part 1.

⁶ Public Outreach Maps HU-1 (p. 341 of 416), WA-1 (p. 344 of 416), and BE-8 (344 of 416) https://mrctransmissionproject.com/wp-content/uploads/2026/02/13_Appendix-M-Public-Outreach-Materials_Part1.pdf

⁷ This is being raised early in the process because the Menahga Project maps also did not show the infrastructure surrounding the Andersen property, and when Andersen wanted to enter the Applicant generated map into the record, the ALJ would not allow it, declaring it duplicative, and in the summary stating that though there was testimony of a 2nd transmission line, the record did not show that line! This time we're working to assure that information is clearly demonstrated in the record.

initially raised and evaluated, and the best entry point to receive consideration. In the Route docket, only route alternatives will be considered. Alternatives raised in our Initial Comment that should be considered include, but are not limited to, building the 345kV structures with the existing 115kV line on an underbuild in the existing corridor south of County Line Road. This and Alternative Transmission Solutions such as batteries; upgrading old existing transmission with high capacity conductors; evaluation of available capacity due to retirement of fossil generation freeing up capacity on existing transmission; directed siting of new distributed generation where there is transmission capacity or near load, were also raised in our Initial Comment. Much has changed in energy generation and delivery, conservation and efficiency -- new technologies -- alternative and non-transmission focused, could demonstrate that this line is not needed, or may even be outdated before construction is completed.

II. AS REQUESTED BY THE APPLICANTS, THE COMMISSION SHOULD STAY THE CERTIFICATE OF NEED AND REFER THE CERTIFICATE OF NEED TO THE COURT OF ADMINISTRATIVE HEARINGS FOR JOINT CERTIFICATE OF NEED AND ROUTE CONTESTED CASE PROCEEDINGS.

The Applicants have requested that the Commission stay the Certificate of Need application until filing of the Route Application, and Andersen agrees that this should be a joint proceeding with the Routing docket with a Commission referral to the Court of Administrative Hearings. Even MISO and Commerce agree!

The Commission has a statutory directive to refer this application to the Court of Administrative Hearings for a joint Certificate of Need and Route proceeding.

Unless the commission determines that a joint hearing on siting and need under this subdivision and chapter 216I is not feasible or more efficient, or otherwise not in the public interest, a joint hearing under this subdivision and chapter 216I must be held.

Minn. Stat. §216B.243, Subd. 4. The Applicants take this mandate seriously.

For the Maple River-Cuyuna 345kV transmission project, Applicants request a joint proceeding and all parties agree that this is the best approach. During that time period waiting for the Route application, the Applicants and Commission could further update landowners about the status of the application and the process going forward to encourage public participation and timing of opportunities. Minn. Stat. §216I.16, Subd. 1.

III. CONCLUSION – STAY CERTIFICATE OF NEED AND JOIN DOCKETS

The Commission should follow the requests of the Applicants and commenting parties, and the letter and spirit of the law, and join these two dockets for thorough and less confusing substantive and environmental review.



Dated: March 3, 2026

Carol A. Overland MN Lic. 254617
Attorney at Law
Attorney for Donna J. Andersen and Curtis
Andersen, and Donna's Acres, LLC,
formerly the Donna J. Andersen Trust,
Donna J. Andersen, Trustee
1110 West Avenue
Red Wing, MN 55066
(612) 227-8638
overland@legalelectric.org