

State of Minnesota
Court of Administrative Hearings
For the Public Utilities Commission

In the Matter of the Application for a Certificate of Need for the PowerOn Midwest 765 kV and
345 kV High Voltage Transmission Line Project

MPUC Docket No. E002, ET2, ET6675/CN-25-117

CAH Docket No.: 28-2500-41617

Direct Testimony of Britta Bergland

August 13, 2026

1 **I. INTRODUCTION AND QUALIFICATIONS**

2

3 **Q. Please state your name and business address.**

4 A. My name is Britta Bergland. My business address is 1 Main Street SE Suite 300,
5 Minneapolis, MN 55414.
6

7 **Q. By whom are you employed and in what capacity?**

8 A. I am employed as a Senior Consultant with Merjent, Inc. (Merjent). Merjent is an
9 environmental consulting firm based in Minneapolis, Minnesota that works primarily
10 within the energy industry. Merjent provides permitting, engineering, survey, construction,
11 and restoration support for electric transmission, pipeline, power generation, and other
12 similar projects across the United States, including in Minnesota.
13

14 **Q. Please briefly describe your educational background and professional experience.**

15 A. I have a Bachelor of Arts from Gustavus Adolphus College, where I majored in
16 Environmental Studies and English and minored in Geography. I have over 20 years of
17 experience in the environmental field. As an environmental consultant, I have supported
18 environmental review, permitting, and compliance efforts for projects in the power
19 generation, electric transmission, pipeline, biofuels, and mining industries.
20

21 **Q. What are your responsibilities as a Senior Consultant at Merjent?**

22 A. In my role as Senior Consultant, I manage permitting and environmental review efforts for
23 energy projects.
24

25 **Q. For whom are you testifying?**

26 A. I am testifying on behalf of Great River Energy; Northern States Power Company, doing
27 business as Xcel Energy; and ITC Midwest LLC (collectively, Applicants), in support of
28 their Joint Certificate of Need Application (Application) to the Minnesota Public Utilities
29 Commission (Commission) for the PowerOn Midwest Project (Project).

1 **Q. What is your role with respect to the Project?**

2 A. Merjent is providing environmental permitting support for the Project. I supervised and
3 assisted with development of the environmental portions of the Application.
4

5 **II. TESTIMONY OVERVIEW**

6

7 **Q. How is your Direct Testimony organized?**

8 A. My Direct Testimony is organized as follows:

- 9 • Section III: Notice Area
- 10 • Section IV: Application Environmental Information
- 11 • Section V: Agricultural Impact Analysis
- 12

13 **Q. What schedules are attached to your Direct Testimony?**

14 A. The following schedule is attached to my Direct Testimony:

- 15 • **Schedule 1**: Statement of Qualifications
- 16

17 **Q. Are you sponsoring any sections of the Application?**

18 A. Yes, I am sponsoring the following sections of the Application:

- 19 • Section 1.8 – Public Input and Involvement and Notice Area (*portion related to Notice*
20 *Area*)
- 21 • Section 1.9 – Potential Environmental Impacts
- 22 • Chapter 10 – Environmental Information
- 23

24 **III. NOTICE AREA**

25

26 **Q. Did the Applicants develop a Notice Area for this proceeding?**

27 A. Yes. The Notice Area includes all or portions of the following counties: Lincoln, Pipestone,
28 Rock, Lyon, Murray, Nobles, Redwood, Cottonwood, Jackson, Martin, Faribault, Waseca,
29 Freeborn, Steele, Mower, Dodge, Olmsted, Goodhue, and Dakota. The Applicants

designed the Notice Area to be broad enough to encompass potential future routing corridors, but exclude areas where future routing is unlikely, either because of the presence of routing constraints, and/or because of the Project's geographic requirements.

Q. How was the Notice Area developed?

A. As described in Section 1.8 of the Application, the Applicants first identified a larger "study area" that would encompass the designated endpoints for the Project and then refined the study area to exclude portions of counties where routing was unlikely due to known constraints or because of the Project's geographic requirements. Once the exterior boundaries of the Notice Area were established, the Applicants generally excluded municipalities with populations exceeding 200 persons from the Notice Area because routing the Project within such municipalities is unlikely. There were some exceptions to this approach if there were existing road or utility corridors within those municipal boundaries, or other potential routing opportunities, which could be considered for Project routing.

Q. Is the Notice Area also the Study Area described in Chapter 10 of the Application?

A. Yes. The Notice Area also represents the Project's Study Area for the purposes of the analysis in Chapter 10 of the Application.

IV. ENVIRONMENTAL INFORMATION

Q. What environmental information is included in the Application?

A. In Chapter 10, the Application includes a discussion of the following topics/resources within the Study Area: physiographic regions; hydrologic features; natural vegetation and wildlife; land use; human settlement; aesthetics; and archaeological and historical resources, as well as the likely permits and approvals needed for the Project.

1 **Q. Why was the selected environmental information included in the Application?**

2 A. The selected environmental information was included to provide the Commission,
3 members of the public, and local, state, and federal agency and Tribal government staff
4 with information regarding the resources present within the Study Area and to comply with
5 the requirements of Minn. R. 7849.0330(G).
6

7 **Q. Why does Chapter 10 of the Application not include calculations of potential Project**
8 **impacts?**

9 A. Chapter 10 includes information regarding human and environmental resources that are
10 present within the Study Area, but it does not calculate impacts because, to calculate
11 impacts, it is necessary to have a route on which to base those calculations. Potential
12 impacts will be calculated in forthcoming route permit applications.
13

14 **Q. Does the landscape of the Study Area change from west to east?**

15 A. Generally, yes. As described in Section 10.1 of the Application, the landscape across the
16 Study Area transitions from the northwest to the southeast due to historical glacial
17 processes. These variations are reflected in the changing patterns of hydrology, vegetation,
18 wildlife, land use, and human settlement. Level topography, prairie remnants, and
19 agricultural fields dominate the western portions of the Study Area. Progressing east, the
20 terrain transitions to predominantly level to slightly undulating landforms. In the south-
21 central portion of the Study Area, the landscape is characterized by a higher density of
22 lakes and wetlands. The eastern portion of the Study Area is characterized by an increase
23 in areas of hardwood forests, bedrock outcrops, and rolling topography.
24

25 **Q. Please discuss the land uses prevalent within the Study Area.**

26 A. Most of the Study Area is rural, with scattered small municipalities and farmsteads
27 throughout. Generally, population density is greater in the eastern counties within the Study
28 Area. Based on review of the USGS National Land Cover Database, the predominant land
29 use category throughout the Study Area is cultivated crops, followed by developed land.

1 The western portion of the Study Area has a higher percentage of cultivated cropland than
2 the eastern portion of the Study Area, whereas the eastern portion of the Study Area has a
3 higher percentage of forest, open water, and developed land use types than the western
4 portion of the Study Area.

5
6 **Q. Will the Project require additional permits and approvals?**

7 A. The Project will require additional permits and approvals from various federal, state, and
8 local agencies. Table 10.8-1 of the Application identifies the permits and approvals that
9 will potentially be required for the Project. Some of the identified permits and approvals
10 will depend on the final approved routes and conditions encountered during construction.

11
12 **Q. Will additional environmental analyses be conducted before the Project is
13 constructed?**

14 A. Yes. As I mentioned above, the route permit applications that the Applicants will submit
15 for the Project will include route-specific environmental information and potential impact
16 calculations, primarily based upon desktop analysis. I understand that the Commission will
17 conduct route-specific environmental review as part of the route permit processes. Further,
18 prior to construction, the Applicants will conduct field survey and study as needed along
19 the approved routes to identify and/or quantify specific resources. Surveys could include
20 those for wetlands, cultural resources, and protected species, as examples.

21
22 **V. AGRICULTURAL IMPACT ANALYSIS**
23

24 **Q. The Commission required the Applicants to “[p]rovide the best technical literature
25 on the best ways to modify agricultural practices” around 765 kilovolt (kV)
26 transmission structures. Did the Applicants provide this literature?**

27 A. Yes. With their May 29, 2026, Response to Scoping Comments, the Applicants provided
28 a bibliography containing citations to potentially relevant literature. Merjent prepared the
29 bibliography. The Applicants’ filing also described the methodology that Merjent used to

1 identify potentially relevant literature. In general, we attempted to identify literature that
2 was responsive to the question of how to modify agricultural practices around 765 kV
3 structures, and, to avoid potential “cherry-picking,” we included the resulting sources in
4 the bibliography, regardless of Merjent’s impression of the accuracy or validity of the
5 source.

6
7 **Q. Have you reviewed the literature included in the bibliography prepared by the**
8 **Applicants?**

9 A. Yes.

10
11 **Q. Were there any common themes among the articles?**

12 A. Most of the potentially relevant publications regarding lattice-specific research are from
13 the 1970s-1980s. Common themes include that land beneath structures is typically
14 unplanted and unharvested once structures are installed. The loss of productive agricultural
15 land is independent of crop type and is permanent in nature while the structure is in place.
16 The presence of structures increases machinery maneuvering time, and the placement of
17 towers can have an impact on farmers’ ability to maneuver equipment within the field.

18 **Q. The Commission also required the Applicants to “estimate the number of agricultural**
19 **acres per mile that would be lost to production when best management practices are**
20 **used” for three different structure types. Did the Applicants provide these**
21 **calculations?**

22 A. Yes. Merjent prepared the calculations based on inputs received from the Applicants and
23 the Applicants provided these calculations with their May 29, 2026, Response to Scoping
24 Comments. In his Direct Testimony, Mr. Daniel Lesher provides an update regarding
25 additional analysis since conducted by the Applicants. My Direct Testimony focuses on
26 the conceptual analysis presented in the Applicants’ Response to Scoping Comments.

1 **Q. How did Merjent prepare the agricultural impact calculations?**

2 A. For the purposes of the calculations, to provide an apples-to-apples comparison among
3 structure types, we assumed that the transmission line would be within (not on the edge of)
4 an agricultural field. Based on structure dimensions provided by the Applicants, we
5 calculated the footprint for each structure type and then added a two-foot-wide “halo”
6 around each to account for the fact that farmers will not farm immediately to the edge of
7 the structure. We then multiplied the structure footprint (including the halo) by the average
8 anticipated structures per mile for each structure type. This calculation resulted in a total
9 acres per mile taken out of agricultural production for each structure type.

10
11 **Q. How should the agricultural impact calculations provided by the Applicants be used**
12 **in this docket?**

13 A. The calculations are a proxy of the potential impacts to allow for a high-level comparison
14 among structure types in a generic setting. However, they do not account for site- and route-
15 specific impacts. For example, the Applicants are developing routes based on Minnesota’s
16 routing criteria, which directs applicants to first consider routes along existing
17 infrastructure (high voltage transmission lines, roads, etc.), property lines, and field lines.
18 The potential agricultural impacts will differ based on how the transmission line is routed
19 on any individual field, the ultimate size of the unique structure footprints, the span lengths
20 between structures, how an individual operating agricultural equipment chooses to
21 maneuver around a given structure, and where each structure is placed on any individual
22 field. The Applicants will site each structure as part of final engineering design, and during
23 this process, will seek to minimize and avoid potential impacts on each property where
24 possible. The increased span length between the lattice structures, as compared to the span
25 length between hypothetical monopole and H-frame structures results in fewer structures
26 per mile. This could also decrease the number of landowners who will host structure
27 foundations. Further, as explained by Mr. Kyle Oraskovich in more detail, the calculations
28 also do not reflect engineering considerations – for example, the fact that lattice structures

1 would be needed periodically along the line for high loading, even if the majority of the
2 Project were constructed using monopole or H-frame structures.

3
4 **VI. CONCLUSION**

5
6 **Q. Does this conclude your Direct Testimony?**

7 **A. Yes.**



BRITTA BERGLAND

PROFESSIONAL EXPERIENCE

Britta Bergland is a Senior Consultant at Merjent, with over 20 years of experience working in the environmental industry. Prior to joining Merjent, she worked for another environmental consulting firm, as well as for an operator of Midwest nuclear power plants.

She specializes in permitting and environmental review of large-scale energy projects in Minnesota and has worked for project proposers and as a third-party consultant.

SELECT PROJECT EXPERIENCE

Multiple Clients, PowerOn Midwest

Project Manager for environmental support for new single circuit 765-kV transmission lines and a second-circuit 345-kV transmission line in Minnesota.

Dairyland Power Cooperative, Wabasha Relocation Project

Deputy Project Manager and Minnesota Permitting Lead for a new 161-kV transmission line in Minnesota.

Great River Energy, Multiple Transmission Line Projects

Project Manager and Deputy Project Manager for new 69- to 115-kV transmission lines in Minnesota.

Xcel Energy – Prairie Island Nuclear Generating Plant

Project Manager for development of environmental portions of the applications to renew the federal licenses of a nuclear power plant and a nuclear fuel storage facility, as well as a separate project to expand a nuclear fuel storage facility in Minnesota.

Xcel Energy – Monticello Nuclear Generating Plant

Project Manager for development of environmental portions of an extended power uprate application for a nuclear power facility in Minnesota. Deputy Project Manager for expansion of a spent-fuel storage facility. Supported license renewal of the plant as an employee of the plant operator.

Summit Carbon Solutions, Midwest Carbon Express Project

Minnesota permitting lead for a new carbon dioxide pipeline in Minnesota.

Confidential Client – Line 3 Deactivation Project

Minnesota State Permitting Lead for activities to support deactivation of an oil pipeline.

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APP-___ (Bergland)

Direct Schedule 1



Confidential Client – Line 3 Replacement Project

Minnesota State Permitting Lead for a crude oil replacement pipeline in North Dakota, Minnesota, and Wisconsin.

American Peat Technology – APT's P.E.A.T. Project in McGrath

Project Manager for a proposed peat mine in Aitkin County, Minnesota.

Confidential Client – Sandpiper Pipeline Project

Minnesota State Permitting Lead for a new crude oil pipeline in North Dakota, Minnesota, and Wisconsin.

Questar Pipeline Company – ML 41 Compression Project (7c Application)

Deputy Project Manager and Resource Report author (Geology, Soils, Socioeconomics, and Land Use) for a Federal Energy Regulatory Commission (FERC) 7(c) Environmental Report for a natural gas pipeline replacement project in Utah.

Questar Pipeline Company, ML 104 Extension to Fidler Project (7c Application and Applicant-prepared EA)

Resource Report author for Socioeconomics and Land Use for a FERC 7(c) Environmental Report for a new natural gas pipeline in Utah.

Dominion, Atlantic Coast Pipeline Project (FERC third-party EIS)

Co-authored the Alternatives Analysis for a FERC EIS for a new natural gas pipeline in Pennsylvania, West Virginia, Virginia, and North Carolina.

NEXUS Gas Transmission -Nexus Gas Transmission Project and Texas Eastern Appalachian Lease Project (FERC third-party EIS)

Supported a FERC third-party EIS for a natural gas pipeline in Ohio and Michigan.

El Paso, Ruby Pipeline L.L.C. (a Kinder Morgan entity) – Ruby Pipeline Project (FERC third-party EIS)

Supported a FERC third-party EIS and Biological Assessment (BA) for a natural gas pipeline in Wyoming, Utah, Nevada, and Oregon.

TransCanada and ExxonMobil – Alaska Pipeline Project

Resource Report author (Reliability and Safety) and Document Specialist for a FERC 7(c) Environmental Report application for a natural gas pipeline from the North Slope of Alaska to the U.S.-Canada border.

EDUCATION

B.A., Environmental Studies and English, Geography Minor; Gustavus Adolphus College.

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Direct Schedule 1

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Merjent, Inc.*

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