

June 26, 2026

Power On Midwest
5115 Excelsior Blvd #113
St. Louis Park, MN 55416

VIA EMAIL ONLY
(connect@poweronmidwest.com)

Re: Elk Township Comments on Preliminary Route

Dear Project Team:

This firm represents Elk Township, Nobles County, Minnesota (“Town”) and I am writing on the Town’s behalf to encourage Power On Midwest (“Company”) to eliminate the proposed route corridors through the Town. The Town appreciates the opportunity to comment directly to the Company on this issue and to point out the following reasons the Company should avoid pursuing routes through the Town. The Town desires to fully engage in this process in ensure its residents are protected.

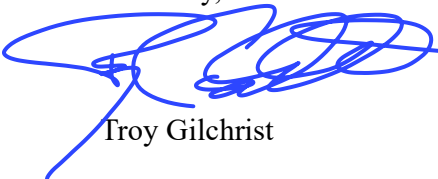
Interference with Airport Operations. The Town is located immediately north of the Worthington Airport. Both runways are oriented so that aircraft approaching or departing the airport fly through the Town. It is at the very least prudent to avoid placing transmission lines in the vicinity of the airport and aircraft operation areas.

Interference with Aerial Spraying Operations. Several large farming operations within the Town rely on aerial spraying as a critical part of their operations. There can be as many as five planes operating throughout the day serving various agricultural businesses within the Town. The installation of transmission lines will directly interfere with the continuation of those operations and force unwanted and costly changes to their agricultural businesses.

Interference with Agricultural Operations and Drain Tiles. The Town is fortunate to have extremely productive farmland with mostly square, unobstructed fields. To make the most of the land, farmers have needed to invest heavily in tile to drain the soil. Construction activities and the placement of towers will interfere with that critical infrastructure and undermine the investment the farmers have made in those systems.

The Town understands the Minnesota Public Utilities Commission is the permitting authority over the project, but the Town encourages the Company to take into account the Town’s concerns and to select proposed routes for the project that avoid the Town. The Town’s supervisors would be happy to discuss their concerns in greater detail if the Company would like to reach out to them.

Sincerely,



Troy Gilchrist

cc: Elk Township

July 7, 2026

Troy Gilchrist, Attorney
troy@townlawcenter.com
Town Law Center PLLP
1250 Wayzata Blvd E
Unit #1065
Wayzata, MN 55391

RE: PowerOn Midwest – Elk Township Comments on Preliminary Route

Dear Mr. Gilchrist:

We represent Xcel Energy and ITC Midwest LLC (collectively, Utilities), the utilities who will co-own the proposed PowerOn Midwest 765 kilovolt transmission line between the South Dakota border and the Lakefield Substation (Project). This letter responds to your June 26, 2026 letter sent on behalf of Elk Township (Township), which is located in the Project area.

The Township's comments and other comments provided during the route development process will help inform the route that the Utilities propose in the route permit process before the Minnesota Public Utilities Commission (Commission). The Project Team expects to file a route permit application with the Commission no earlier than the first quarter of 2027. At that time, the Commission will evaluate potential routes for the Project in accordance with Minn. Stat. Ch. 216I.

Worthington Airport

The Township raises concerns related to the Project's potential impact on the Worthington Airport. The Project Team, as part of the route development process, has specifically evaluated the protected airspace around the Worthington Airport and will comply with all applicable Federal Aviation Administration regulations. As a result, no impacts to aviation are anticipated.

Aerial Spraying

Your letter also states concerns regarding aerial spraying. Once constructed, the transmission structures and lines will be new obstacles on the landscape. Based on our experience with transmission lines, aerial applicators should be able to parallel new transmission infrastructure similar to how they work with existing infrastructure today. Some adjustments to aerial applicator flights may be necessary based on the line's orientation along fields.

Agricultural Operations and Drain Tile

The Project Team considered the impact on agricultural operations in evaluating potential structures for the Project. The Project Team rejected a guyed structure design due to the risk that guy wires present to agricultural equipment. Instead, the Project Team designed a self-supporting lattice structure that does not require guy wire support. The Project Team is also seeking to minimize agricultural impacts during the route development process.

Prior to construction, the Project Team will work with the Minnesota Department of Agriculture to develop an Agricultural Impact Mitigation Plan to identify measures the Project Team will take to avoid, mitigate, repair and/or provide compensation for impacts that may result from the construction of the Project on agricultural land.

Prior to and during construction, the Project Team will work with landowners to minimize impacts to drain tile. To do so, the Project will employ multiple techniques, including:

- Coordination with landowners during final design and prior to start of construction to identify drain tile systems and avoid them to the extent practicable.
- When practicable, construction will be scheduled during frozen ground conditions.
- When construction during frozen conditions is not practicable, construction mats will be used where wetlands and other sensitive areas would be impacted.
- Equipment fueling and other maintenance will occur away from environmentally sensitive areas and waterways. These construction practices

help prevent soil erosion and ensure that fuel and lubricants do not enter waterways or impact environmentally sensitive areas.

- Various best management practices (BMPs) will be identified in the Project's Stormwater Pollution Prevention Plan, including the use of silt fences, bio logs, erosion control blankets with embedded seeds, hydromulch, and other sound water and soil conservation practices to protect topsoil and adjacent water resources and to minimize soil erosion.

Where drain tile is impacted as a result of the Project, the Project Team will coordinate with the respective landowner(s) to ensure proper repairs are performed at the Project's expense.

Once the Project is operational, farming activities will generally be allowed to continue within the right-of-way.

Conclusion

The Project Team appreciates the Township's comments and is committed to ongoing engagement with potentially affected local governments, like the Township. We encourage the Township to remain involved in the routing process and to submit additional comments prior to the filing of the route permit application to the Project Team. Once the route permit application is filed, comments should be submitted to the Commission as part of the route permit proceeding. Please feel free to contact the undersigned if you have any questions.

Sincerely,

/s/ Lisa Agrimonti

Lisa Agrimonti
Attorney
Fredrikson & Byron, P.A.

/s/ Valerie Herring

Valerie Herring
Attorney
Taft Stettinius & Hollister LLP

October 26, 2026

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VIA EMAIL ONLY
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Re: Elk Township Comments on Preliminary Route

Dear Counsel:

I am writing in response to your letter dated July 7, 2026 to supplement the public comments submitted by Elk Township, Nobles County, Minnesota (“Town”) and to encourage Power On Midwest to eliminate the proposed route corridors through the Town.

Aerial Spraying. The proposed route would position the new 765kV transmission lines in close proximity to the existing 345kV transmission line. The proposed A110 line will be within two miles of the 345kV line. The proposed route would leave much of the Town’s farmland situated between two major transmission lines, creating a narrow corridor that makes aerial application difficult. As you noted, aerial applicators can usually work around one large line, but adding another parallel line in the same vicinity introduces risks that many operators may not take. Without aerial spraying, yields will almost certainly suffer. The new 765 kV line should be placed further away or routed alongside existing infrastructure so that application remains feasible and farms stay productive.

Interference with Agricultural Operations and Drain Tiles. The 765 kV transmission towers will require a substantial base footprint, ranging from 35 feet by 35 feet up to 50 feet by 50 feet. Under the proposed route, these structures would be placed directly within active farm fields, removing productive acreage and creating new hazards for farmers and their equipment. Their size and placement would disrupt field operations, limit maneuverability, and increase the risk of collisions or equipment damage.

The greatest risk to local farming comes from the installation and ongoing maintenance of the towers themselves. This project spans hundreds of miles of transmission line, and not all installation can realistically be confined to frozen-ground conditions. Construction of 150- to 175-foot towers with foundations reaching 25 to 65 feet deep requires heavy machinery. Drain tile and soil are extremely sensitive to weight and moving that equipment across active fields carries a real possibility of long-term soil damage. It is far safer and more practical to place these towers along existing roads, such as Interstates, highways, or railroads where heavy equipment can be moved and operated without causing lasting damage to farmland.

After the towers are built, they will still need regular service, and that work will not be limited to winter months. Problems with transmission lines are inevitable, and some will occur during the growing season. If towers sit in the middle of farm fields, every maintenance visit during that period will require clearing access paths through crops for heavy equipment, disrupting field operations, creating safety concerns, and reducing yields. This outcome is predictable and avoidable. Routing the line along existing right of ways, rather than through the center of productive fields, would prevent these impacts.

Elk Township contains the most productive farmland within the southwest region of the State with an average Crop Production Index (CPI) rating of 93.14 – higher than any other township within the proposed route. Any route that diminishes crop production should be avoided, particularly where feasible alternatives exist. *See People for Env't Enlightenment & Resp. (PEER), Inc. v. Minnesota Env't Quality Council*, 266 N.W.2d 858, 864 (Minn. 1978) (A high voltage transmission line route “that impairs, pollutes, or destroys protected natural resources cannot be approved if there is a prudent and feasible alternative route available.”). In this case, viable alternative routes along existing roads and established corridors (such as I-90) are available and would substantially reduce impacts on farmland while still meeting the project’s transmission objectives.

If following an existing corridor is not feasible, Power On Midwest and the Commission should select the shortest possible route, with the fewest corners or deviations, to minimize interference with agricultural operations. Property lines should not be treated as potential corridors because they do not provide access to continuous, navigable routes. When no true corridor exists and passage through farmland is unavoidable, the route should be streamlined to minimize the overall impact on the farmland land it traverses.

For these reasons, the Town respectfully requests that Power On Midwest reevaluate the effects the proposed route would have on Elk Township’s residents and farming operations and shift the corridor to existing roads or established transmission routes rather than placing new infrastructure through the Town’s productive farmland. If such a route is not feasible, the Town respectfully requests that Power On Midwest takes the most direct route to minimize the negative impacts on farmland.

Sincerely,

/s/ Troy Gilchrist

Troy Gilchrist

cc: Elk Township



October 27, 2026

VIA EMAIL ONLY

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Re: Elk Township October 26, 2026 Comments on Preliminary Route

Dear Mr. Gilchrist:

Thank you for your letter dated October 26, 2026 on behalf of Elk Township regarding the PowerOn Midwest South Dakota border to Lakefield Substation 765 kilovolt transmission line project (Project). The letter emphasizes the concerns noted in your firm's June 26, 2026 letter regarding aerial spraying and agricultural impacts.

The utilities who will co-own the proposed Project, Xcel Energy and ITC Midwest LLC, encourage Elk Township to participate in the route permit proceeding that will commence in 2027.

Sincerely,

/s/ Lisa M. Agrimonti

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/s/ Valerie T. Herring

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