Appendix D

Response to Minnesota Public Utilities Commission Draft Application Review Comments

Gopher to Badger Link Project
Response to Minnesota Public Utilities Commission Energy Infrastructure Permitting Staff's
October 8, 2026 Comments (Table 1 – Application Completeness Requirements) on the August 19, 2026 Draft Application

Topic	Statutory Requirement	Location in Document	Applicant Response
Project ownership	**216I.05, subd. 3(b)(1)**	**Section 1.4**	
Meets staff expectations. Xcel Energy will own Segment 1 and both Dairyland and Xcel will own Segment 2, in addition to GridLiance Heartland LLC, a subsidiary of NextEra Energy. The rebuilt 161 kV facilities in Segment 2 will be wholly owned by Dairyland. It would be helpful to state all the applicants/owners in full in this section.			Applicants have reviewed and incorporated suggested edits from EIP staff.
Permittee name	**216I.05, subd. 3(b)(2)**	**Section 1.5**	
Meets staff expectations.			Updates to the Xcel project contact information has been included.
Project description	**216I.05, subd. 3(b)(3)**	**Section 1.2**	
Generally meets staff expectations.			Applicants have reviewed and incorporated suggested edits from EIP staff, including defining industry terms, adding example photos of proposed structures, and inserting clarifying text.
Environmental Information, generally	**216I.05, subd. 3(b)(4) and subd. 4(a)**	**Section 6**	
Include environmental information for the proposed route as detailed in Minn. Stat. § 216I.05, subd. 4(a). See resource-specific discussion.			Applicants have reviewed and incorporated suggested edits from EIP staff or provided clarification where necessary.

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Identification of Property Owners	**216I.05, subd. 3(b)(5), as described in 216I.05, subd. 8 (3)**	**Appendix E**	
Meets staff expectations.			N/A
Maps	**216I.05, subd. 3(b)(6)**	**Included as attachments Appendix F**	
Staff recommend including additional in-text figures and diagrams that have been included in the appendix for public accessibility. Staff included specific comments and recommendations for where to include these figures. Staff also provided detailed comments and recommendations on project maps to ensure maps are readable and accessible to the public.			The Applicants have added in-text references to figures as requested by EIP staff, have embedded figures in the text and provided in-text links to figures. The Applicants have also incorporated edits to the in-text figures and the detailed maps provided in Appendix F.
Existing ROWs	**216I.05, subd. 3(b)(7)**	**Section 4.3 and Appendix F**	
Meets staff expectations. Existing ROWs have been identified in the alternative review discussion, as well as within several maps included in Appendix F. EIP staff recommends that applicants provide an illustration of how the proposed alignment and ROW would interact with existing ROWs for transportation and energy infrastructure.			The Applicants have addressed the EIP comments provided in this section. The Applicants also incorporated additional text to explain that the route alternatives consist of preliminary alignments; rights-of-way for each route alternative have not been developed due to the feasibility constraints identified further in this section. A diagram illustrating the concept of co-location with road and utility rights-of-way has also been added.

Topic	Statutory Requirement	Location in Document	Applicant Response
Project design, including required ancillary facilities	**216I.05, subd. 3(b)(8)**	**Section 3**	
Generally meets staff expectations. See specific comments in the redlined draft application.			Applicants have reviewed and incorporated suggested edits from EIP staff or provided clarification where necessary.
Project cost	**216I.05, subd. 3(b)(9)**	**Section 1 and Section 3.4**	
Meets staff expectations. Costs have been provided as a range for each segment of the project.			N/A
Design for expansion	**216I.05, subd. 3(b)(10)**	**3.3**	
Meets staff expectations. Included within the design considerations to accommodate future needs. It is noted that the Jefferson Ridge Switching Station will be designed to accommodate expansion, if needed.			N/A
ROW acquisition, construction, maintenance, & restoration	**216I.05, subd. 3(b)(11)**	**Section 5**	
Meets staff expectations. A discussion of ROW acquisition, construction, maintenance and restoration is included. Additional information about future geotechnical work related to karst would be helpful to include here, as well as additional information about foundation installation, and how spoil materials will be disposed of.			Applicants have reviewed and incorporated suggested edits from EIP staff or provided clarification where necessary. Additional information includes further details regarding future geotechnical investigations, examples of BMPs, and disposal of spoils/materials.

Topic	Statutory Requirement	Location in Document	Applicant Response
Other Permits	**216I.05, subd. 3(b)(12)**	**Section 7.1**	
Generally meets staff expectations. A discussion of anticipated permits is included in Section 7.1 and Table 7.1-1. The description of DNR permits may need updating after a response from the NHIS is received.			Applicants have reviewed and incorporated suggested edits from EIP staff, including providing additional explanations of the CN and RP proceedings and local permitting. No edits are needed to the list of potential MDNR permits based on the NHIS letter.
CN Requirement	**216I.05, subd. 3(b)(13)**	**Section 2.1**	
The project requires a certificate of need (CN). The applicants submitted a CN application on February 6, 2026 (Docket No. CN-25-121). The Commission found the application substantially complete on April 29, 2026. The applicants are encouraged to avoid references to a "Joint application" throughout the application and clarify the CN process to date by providing references to the existing docket, differentiating between that document, and the route permit.			The Applicants have reviewed the Application and removed the reference to "Joint Application" throughout.
Other sites or routes considered	**216I.05, subd. 3(b)(14)**	**Section 4.3**	
Discussion of several alternative routes, corridors and river crossings is included. If additional alternatives are considered based on NHIS information from the DNR, the applicants should discuss these alternatives in the application.			The Applicants have added discussion of an Alternative Alignment and Route Segment Alternative that have been suggested by the MDNR.
Additional information required by rule	**216I.05, subd. 3(b)(15)**	**n/a**	
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Topic	Statutory Requirement	Location in Document	Applicant Response
Tribal coordination	**216I.05, subd. 3(b)(16)**	**Section 7**	
Does not meet expectations. Staff requests that applicants reach out again to the THPOs for the Minnesota tribes who did not respond with a follow-up email and, if that is not successful, a phone call. It appears only two of the eleven recognized tribes have followed up with the applicants, and four of 25 contacts. You should make extensive efforts to coordinate with all Tribes within the state and include the results of that coordination in your application, including any Tribes contacted outside of Minnesota.			The Applicants have sent Project introduction (May 2026) and Project update (August 2026) letters to the Tribes and have called the Tribal Historic Preservation Officers associated with the designated Minnesota Tribes, as documented in the updated Table C2-2 in Appendix C.
Preapplication Coordination (LGUs)	**216I.05, subd. 5 (1)**	**Section 1.8 Section 2.3.1 Section 7 Appendix C**	
Meets staff expectations. Early coordination was complete with LGU's at the local and county level. Staff recommend applicants continue conversations with LGU's and incorporate comprehensive planning and local goals into project design where feasible.			N/A

Topic	Statutory Requirement	Location in Document	Applicant Response
Preapplication Coordination (State Technical Resource Agencies)	**216I.05, subd. 5 (3)**	**Section 1.8 Section 2.3.1 Section 7 Appendix C**	
Does not meet staff expectations. Early coordination is expected to occur with state agencies, including DNR and MDA. The most recent response from the DNR's Natural Heritage Information Review automatic system (NHIS) identified the need for additional review for the following areas: MBS Sites, RNC and WCA permitting, local conservation value, NPC's, calcareous fens and potential impacts, lakes, and protected species. The applicants are expected to complete coordination with the DNR regarding the necessary review of these categories, and incorporate recommendations from the agency into application contents, such as impacts and mitigation. Given the size and novelty of this project, along with high public interest, the Commission is unlikely to consider the application complete without a complete NHIS response by DNR, as this missing information could have a significant effect on the public's ability to meaningfully provide scoping comments and alternatives. Applicants should include information and recommendations provided by DNR through the NHIS review and their response letter in this section as well as in Appendix C. Applicants should provide updated records of coordination between all required state agencies, with the feedback woven into the application.			The MDNR provided the Applicants with their NHIS Review on October 2, 2026. The NHIS letter is consistent with information included in the Applicant's draft Route Permit Applicant that was developed using publicly available MDNR geospatial data and NHIS data available to the Applicants via a license agreement with the MDNR; therefore, there have only been minor updates to this section. The Applicants have incorporated documentation of additional coordination with the MDNR in Appendix C and summarized in Section 7.2.5. The MDNR has suggested a Route Segment Alternative and Alignment Alternative, which have been incorporated into Section 4.4.2.1 and 4.5, respectively. The Applicants have also incorporated the SHPO response to its Phase Ia Cultural Resources Literature Review, and response from MIAC. The Applicants also submitted the draft AIMP to the MDA for review.
Environmental setting	**216I.05, subd. 4(a)(1)**	**Section 6.3**	
Generally meets staff expectations. See comments on areas to include specific additional details including unique environmental settings such as Blufflands, or Oak Savanna.			Applicants have reviewed and incorporated suggested edits from EIP staff or provided clarification where necessary.

Topic	Statutory Requirement	Location in Document	Applicant Response
Human settlement, generally	**216I.05, subd. 4(2)**	**Section 6.4**	
Does not meet staff expectations. This section needs to also include a discussion of parks and recreational areas, significant landmarks, and major transportation and energy infrastructure in each respective segment study area			The Applicants provide extensive discussions of parks and recreational areas in Section 6.4.6 and major transportation and energy infrastructure in Section 6.4.4.
Public health & safety including EMF	**216I.05, subd. 11(b)(1) (Decision Criteria)**	**6.5**	
Does not meet staff expectations. Applicants should ensure the discussions for each resource have been evaluated for the correct ROI as defined. In this section, it would be the local region. In addition, this section should incorporate data from US governments and state governments regarding EMF, including the Minnesota whitepaper referenced in other PUC documents. Discussion of stray and induced voltage is also included in this section, which meets expectations.			Applicants have reviewed and incorporated suggested edits from EIP staff or provided clarification where necessary.
Displacement	**216I.05, subd. 4(a)(2)**	**6.4.3**	
Meets staff expectations. Applicants should also include a map of outbuildings.			Applicants have reviewed and incorporated suggested edits from EIP staff or provided clarification where necessary. Outbuildings (i.e., structures) are identified in the Appendix F maps; reference to this appendix has been added.

Topic	Statutory Requirement	Location in Document	Applicant Response
Noise	**216I.05, subd. 4(a)(2)**	**6.4.7**	
Overall meets staff expectations. The applicants should discuss whether a noise impact assessment has been completed for the project or will be planned in the future.			The Applicants have not conducted and are not currently planning to conduct a noise assessment for this Project considering the temporary and intermittent nature of noise that would be generated during construction, and because for operation of the Project, the Project is designed to comply with applicable MPCA noise standards at the nearest point of human activity within the applicable noise area classification.
Aesthetics	**216I.05, subd. 4(a)(2)**	**6.4.5**	
Generally meets staff expectations. Additional discussion of potential tree removal and vegetation changes that may affect viewshed should be included, in addition to discussions about existing scenic byways and viewsheds. Staff also include a general recommendation to provide images that show the existing environments and scenic areas as is, and visual simulations of the proposed project components.			The Applicants have included Appendix M, which includes visual simulations of the proposed Project structures.
Socioeconomic Impacts	**216I.05, subd. 4(a)(2); 216I.05, subd. 11(b)(14)**	**6.4.9**	
Meets staff expectations. See staff comments to include more details on local labor, full-time and part-time positions, and specific percentages on employment in the area.			Applicants have reviewed and incorporated suggested edits from EIP staff or provided clarification where necessary.

Topic	Statutory Requirement	Location in Document	Applicant Response
Environmental Justice Impacts	**216I.05, subd. 4(a)(2); 216I.05, subd. 11(a)(3)**	**6.4.8**	
Does not meet staff expectations. There is one Census tract that meets the criteria of an Environmental Justice community in the proposed route. There are also some pre-existing environmental conditions in areas of the route. The applicants should further discuss if any existing environmental conditions may interact with planned project construction within the Environmental Justice community, and how impacts of the project may affect this population in a unique way.			This section has been updated; identifying Census Tract 13 in the draft Application was an error. There are no Environmental Justice communities crossed by the Project.
Cultural Values	**216I.05, bud. 4(a) (2)**	**6.4.1**	
Does not meet staff expectations. Additional information needs to be provided. The application should discuss Comprehensive Plans related to cultural values in the general project area and identify potential consistencies and conflicts between the identified cultural values and the proposed facility.			Applicants have reviewed and incorporated suggested edits from EIP staff or provided clarification where necessary. Consistent with the *MPUC's Draft Application Guidance for Large Energy Infrastructure Facilities in Minnesota,* this section "describe[s] the Project area's history and ethnic heritage, land use, and the work and recreational pursuits of residents." Local comprehensive plans adopted by the counties crossed by the Project are discussed in Section 6.4.2.
Recreation	**216I.05, subd. 4(a)(2)**	**6.4.6**	
Does not meet staff expectations. Staff recommend the applicants include additional discussions about the existing recreational areas including the IBA, WMA's and AMAs, including updates on agency coordination as appropriate. The application should provide references to figures and project maps where applicable. Staff also recommend the applicants include additional discussion on how resources will be reviewed and avoided through alternative route analysis to mitigate or avoid impacts as described.			Applicants have reviewed and incorporated suggested edits from EIP staff or provided clarification where necessary, including the addition of in-text figure references. Because Important Bird Areas (IBAs) are relevant to wildlife habitat, they are discussed in the Wildlife and Habitat section (Section 6.8.9). Additional coordination that has occurred with

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			the MDNR and USFWS since the submittal of the draft Application has been incorporated into the Application. The MDNR has suggested a Route Segment Alternative and Alignment Alternative, which are presented in Sections 4.4.2.1 and 4.5.
Public Services	**216I.05, subd. 4(a)(2)**	**6.4.4**	
This section also includes information about transportation. Staff recommend the applicants continue conversations with MnDOT regarding scenic byways in the proposed route. Staff also recommend the applicants include a discussion of coordination with the owners of pipelines that exist in the ROW as well as the owners and operators of the solar and wind facilities. Generally, this section does not meet staff expectations. Staff left comments regarding the inclusion of future planned projects in the existing conditions section. This section should only be focused on features that currently exist in the area, future projects should be discussed in the cumulative impacts section.			Applicants have reviewed and incorporated suggested edits from EIP staff or provided clarification where necessary. Per the MnDOT process, the Applicants will submit an Early Notification Memo that provides a detailed description of where the Project crosses or shares MnDOT right-of-way to facilitate MnDOT review and scoping comments. The Applicants have included "future planned projects" because they are anticipated to be built before this Project would go to construction in 2030 and therefore are relevant to the discussion. The Applicants have included a discussion of coordination with energy facilities, where applicable.

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Land Use	**216I.05, subd. 11(a) (2)**	**6.4.2**	
Does not meet staff expectations. Additional information about the percentages of land cover types within each route needs to be included. In addition, zoning ordinances and comprehensive plans should be discussed in this section. Include additional maps for zoning.			Applicants have reviewed and incorporated suggested edits from EIP staff or provided clarification where necessary. Zoning ordinances and comprehensive plans are discussed in this section; as further described in the revised text, while the reviewed plans do not generally identify development of high-voltage transmission infrastructure as a specific planning objective, transmission infrastructure is considered within the broader context of existing and planned land uses and infrastructure needs. As described in the text and shown in the table, the majority of the Project area is zoned as agriculture; however, the Applicants have prepared a new Figure 12 based on geospatial data that is publicly available from the counties.
Land-based economics, generally	**216I.05, subd. 4(a)(3)**	**6.6**	
See resource specific discussion			Applicants have reviewed and incorporated suggested edits from EIP staff or provided clarification where necessary.

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Agriculture	**216I.05, subd. 4(3); 216I.05, subd. 11(b)(5) and (9); see also Minn. R. 7850.4400, subp. 4.**	**6.6.1**	
Does not meet staff expectations. This section needs to include an additional discussion on drainage resources and drain tile within the proposed ROW. Describe how the applicants anticipate responding to the discovery of unexpected drain tile. In addition, the applicants are recommended to develop an organic farm plan for this project, due to the presence of several known and potentially unknown organic farms within the proposed route.			The draft AIMP provided in Appendix H addressed how drain tile will be addressed and includes an organic farm plan. The AIMP has been provided to the MDA for review.
Forestry	**216I.05, subd. 4(3)**	**6.6.2**	
Generally meets staff expectations. The application should include more detail about private, state managed, or other forest lands crossed by the proposed route.			Applicants have reviewed and incorporated suggested edits from EIP staff or provided clarification where necessary. The Applicants are not aware of any private commercial forestry operations in the Project area; the only state-managed forestry land is the RJD Memorial Hardwood State Forest.
Mining	**216I.05, subd. 4(a)(3)**	**6.6.3**	
Does not meet staff expectations. The application needs to provide a discussion of DNR mining lands such as peat or mineral leases.			Applicants have reviewed and incorporated suggested edits from EIP staff or provided clarification where necessary. No MDNR mining lands, peat or mineral leases are crossed by the Project.
Tourism	**216I.05, subd. 4(a)(3)**	**6.6.4**	
Meets staff expectations. A summary of several tourist resources is provided.			Applicants have reviewed and incorporated suggested edits from EIP staff or provided clarification where necessary.

Topic	Statutory Requirement	Location in Document	Applicant Response
Archaeological & historic resources	**216I.05, subd. 4(4)**	**6.7**	
Does not meet staff expectations. Additional information needs to be provided about specific construction activities that could occur near cultural resources. Updates related to tribal engagement should be provided.			Applicants have reviewed and incorporated suggested edits from EIP staff or provided clarification where necessary. The Applicants have also incorporated the SHPO response to its Phase Ia Cultural Resources Literature Review, and response from MIAC. The Applicants have sent Project introduction (May 2026) and Project update (August 2026) letters to the Tribes and have called the Tribal Historic Preservation Officers associated with the designated Minnesota Tribes, as documented in the updated Table C2-2 in Appendix C.
Natural environment impacts - generally	**216I.05, subd. 4(5)**	**6.8**	
See resource specific discussions.			Applicants have reviewed and incorporated suggested edits from EIP staff or provided clarification where necessary.
Air quality	**216I.05, subd. 4(a)(5)**	**6.8.1**	
Generally meets staff expectations. The application should clarify the amount of time over which emission measurements were completed.			Applicants have reviewed and incorporated suggested edits from EIP staff or provided clarification where necessary. Anticipated timeline of emissions has been added.

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Geology	**216I.05, subd. 4(a)(5); 216I.05, subd. 11(b)(1)**	**6.8.4**	
Generally meets staff expectations. Discussion of karst resources should be expanded in this section. The applicants should include a discussion of coordination with DNR regarding karst investigation and geotechnical studies for the project, including future planned activities.			Applicants have reviewed and incorporated suggested edits from EIP staff or provided clarification where necessary. Section 5.2 includes a discussion of the planned geotechnical investigations, which is referenced in this section.
Groundwater	**216I.05, subd. 4(a)(5); 216I.05, subd. 11(b)(1)**	**6.8.6**	
Generally meets staff expectations. Clarify if groundwater impacts may potentially interact with surface waters and wetlands, and what regulatory programs exist. Include the discussion of a spill prevention and response plan.			Applicants have reviewed and incorporated suggested edits from EIP staff or provided clarification where necessary. Section 7.1.2.7 describes the requirements and process associated with the Wetland Conservation Act.
Soils	**216I.05, subd. 11(b)(1) and subd. 11(b)(5)**	**6.8.5**	
Generally meets staff expectations. Include a discussion of the removal of soils for foundation installation and how the applicants will manage soil spoils.			Applicants have reviewed and incorporated suggested edits from EIP staff or provided clarification where necessary.

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Surface waters (including stormwater, floodplains, and wetlands)	**216I.05, subd. 4(5); 216I.05, subd. 11(b)(1)**	**6.8.7**	
Does not meet staff expectations. The applicants should include more detailed descriptions of the wetland types that occur within the site, and include any coordination and recommendations received from DNR regarding outstanding value resource waters. A discussion of vegetative clearing in riparian areas should be included. The application should also discuss potential impacts on water temperatures, due to vegetative clearing. The discussion of calcareous fens does not meet staff expectations. DNR coordination provided in Appendix C shows the identification of calcareous fen resources that could potentially be impacted by the project. The applicants are expected to discuss the potential impacts to these resources, the appropriate coordination required with DNR for both the case impacts are expected and the case impacts are avoided.			Applicants have reviewed and incorporated suggested edits from EIP staff or provided clarification where necessary. There are no ORVWs crossed by the Project. Additional explanation of the process for evaluating calcareous fens has been incorporated.
Vegetation	**216I.05, subd. 4(5)**	**6.8.8**	
Generally meets staff expectations. This section should include more detail, provide a table that shows the acreage of vegetation impacts, breaking down the acreage to be impacted temporarily or permanently for each vegetation type and discussing the difference in impacts. Clarify if the VMP is also functioning as the noxious weed and invasive species plan, or if the applicants intend to develop a separate plan for this. Also identify if a native prairie plan will be developed for this project.			Applicants have reviewed and incorporated suggested edits from EIP staff or provided clarification where necessary. The Applicants have not included a table providing acreage of temporary vs. permanent impacts to vegetation. Additional Project design must be completed, based on the route designated by the MPUC, to identify the location of temporary workspaces, access roads, structure locations, etc. and are not available as part of this permit application to quantify permanent vs. temporary vegetation impacts. The Applicants have included a draft VMP in Appendix I, which also serves as the Invasive and Noxious Species Plan. The Applicants

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			indicate in Section 6.8.10.3 that a Prairie Protection and Management Plan will be developed if impacts to native prairie communities cannot be avoided.
Wildlife	**216I.05, subd. 4(5)**	**6.8.9**	
Does not meet staff expectations. Additional information should be provided through figures, and more examples of species present within the project area. In addition, a discussion of the removal of riparian vegetation and resulting impacts on aquatic habitat should be included. The applicants should include a discussion of how impacts to special habitat such as conservations easements and IBA's will be avoided, and what agency coordination would occur as part of that process. Stream crossing plans should also be included, including coordination with DNR.			Applicants have reviewed and incorporated suggested edits from EIP staff or provided clarification where necessary. Additional in-text figure references have been added and the Applicants have provided a list of example species that may be present in the Project area. Section 6.8.9.3 has been updated to incorporate additional coordination from the USFWS regarding wildlife habitat conservation measures and with BWSR regarding the easement process. To reduce avian impacts, Project design will be done in accordance with APLIC guidelines. Stream crossing plans would not be developed at this stage of the permitting process; the Applicants would anticipate that the MDNR would require stream crossing plans as part of the License to Cross Public Waters application based on the route designated by the Commission.

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Rare and unique resources	**subd. 4(8)**	**6.8.10**	
Does not meet staff expectations. The applicants have not completed a full natural heritage information system (NHIS) process with DNR. The NHIS information is currently still being reviewed by DNR for several identified rare and sensitive resources. The applicants are expected to complete full coordination with DNR staff as requested in the automatic response received by DNR in Appendix C. The information and recommendations provided by DNR through the NHIS review and response letter need to be incorporated into this section and provided as mitigation for potential impacts to the identified resources within the route. There should be additional information about what agencies the applicants will coordinate with to determine impacts and appropriate mitigation for protected species and resources. In addition, DNR has noted potential impacts to calcareous fens within the route in the coordination provided in Appendix C. The applicants are expected to incorporate DNR's comments and recommendations regarding calcareous fens into the application.			The MDNR provided the Applicants with their NHIS Review on October 2, 2026. The NHIS letter is consistent with information included in the Applicant's draft Route Permit Applicant that was developed using publicly available MDNR geospatial data and NHIS data available to the Applicants via a license agreement with the MDNR; therefore, there have only been minor updates to this section. The Applicants have incorporated documentation of additional coordination with the MDNR in Appendix C and summarized in Section 7.2.5. The MDNR has suggested a Route Segment Alternative and Alignment Alternative, which have been incorporated into Section 4.4.2.1 and 4.5, respectively. Calcareous fen, and the MDNR evaluation process, are further described in Section 6.8.7. Geotechnical information for the proposed structure locations based on the route designated by the Commission will be provided to the MDNR, as requested, to inform their evaluation. This will not be conducted until after the Route Permit is issued.

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Greenhouse gases	**216I.05, subd. 4(6)**	**6.8.2**	
Generally meets staff expectations. Clarify if construction GHG emissions includes all associated facilities. The GHG emissions associated with land use conversion due to tree removal needs to be included in this section as well. Discuss the total GHG tons generated per year in relation to other regulatory requirements, such as EAW requirements.			Applicants have reviewed and incorporated suggested edits from EIP staff or provided clarification where necessary.
Climate change resilience	**216I.05, subd. 4(7)**	**6.8.3**	
Does not meet staff expectations. Include analysis using FEMA tools to address resilience planning for the project and potential interactions between floodplains, extreme weather events, and climate change near the project area.			Applicants have reviewed and incorporated suggested edits from EIP staff or provided clarification where necessary.
Unavoidable Impacts	**216I.05, subd. 4(9)**	**6.9**	
Include a discussion of greenhouse gases in this section.			Applicants have reviewed and incorporated suggested edits from EIP staff or provided clarification where necessary.
Irretrievable and Irreversible Impacts	**216I.05, subd. 11(b)(11)**	**6.10**	
Generally meets staff expectations. Discuss the usage of resources such as water, fuel, and electricity, including estimates of usage and potential associated emissions.			Applicants have reviewed and incorporated suggested edits from EIP staff or provided clarification where necessary. The amount of water needed to support construction activities, such as concrete, will be estimated following the completion of the geotechnical investigations, which will inform foundation type/depth at each structure location based on the route designated by the MPUC. GHG

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			emissions are discussed and quantified in Section 6.8.2.
Cumulative Effects	**216I.05, subd. 11(a)(2) and (b)(2)**	**6.11**	
Generally meets staff expectations. The applicants reviewed Commission dockets, MISO Transmission Planning, the Environmental Quality Board, MnDOT, and local government planning and transportation improvement programs.			Applicants have reviewed and incorporated suggested edits from EIP staff or provided clarification where necessary.
Mitigation Measures	**216I.05, subd. 4(10)**		
Generally provided throughout each resource discussion. Overall, does not meet staff expectations. See staff comments on each respective section. Mitigation measures need to incorporate agency feedback and recommendations where appropriate. Mitigation should also discuss requirements in commission-issued permits, using recent project permit orders as examples for standard permit conditions. The draft application includes a brief discussion of general conditions from an unreferenced sample route permit in the mitigation section for various resources. Staff appreciates the Applicants' inclusion of permit mitigation measures but recommends that the application filed in eDockets summarize mitigation measures typically required by recent Commission permits (Big Bend HVTL Project; Otto Tap HVTL Project). Sample route permits filed by staff in individual proceedings for facilities seeking a permit under Minn. Stat. §216I are intended to inform the public engagement process, and do not reflect the Commission's ultimate decisions in these proceedings. Citing recent permits issued by the Commission more accurately reflects Commission decisions, while allowing that the conditions identified in Commission orders reflect the unique record for each project. Staff also encourages Applicants to discuss mitigation measures they intend to implement above and beyond permit requirements.			The Applicants have included a mitigation measures section with each resource that describes the mitigation measures that would be implemented for the Project, and, where available, incorporates feedback from the agencies received to date. The Applicants have added standard permit conditions that have been included in other commission-issued permits.