



August 15, 2025

—Via Electronic Filing—

Mike Bull
Acting Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: EXEMPTION REQUEST

IN THE MATTER OF THE APPLICATION FOR A CERTIFICATE OF NEED FOR THE
BISON TO ALEXANDRIA SECOND CIRCUIT 345 kV TRANSMISSION LINE
PROJECT

DOCKET No. E002, ET2, E015, E017, ET6135/CN-25-116

Dear Mr. Bull:

Northern States Power Company, doing business as Xcel Energy, Great River Energy, Minnesota Power, Otter Tail Power Company, and Western Minnesota Municipal Power Agency (collectively, the Applicants) respectfully submit this Exemption Request to the Minnesota Public Utilities Commission pursuant to Minn. R. 7849.0200, subp. 6. Please contact Jody Londo at jody.l.londo@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/ Bria Shea

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JOANN THOMPSON
VICE PRESIDENT, ASSET MANAGEMENT
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cc: Service List

**STATE OF MINNESOTA
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 FOR
A CERTIFICATE OF NEED FOR THE BISON
TO ALEXANDRIA SECOND CIRCUIT 345 kV
TRANSMISSION LINE PROJECT

Docket No. E002, ET2, E015, E017,
ET6135/CN-25-116

**REQUEST FOR EXEMPTION FROM
CERTAIN CERTIFICATE OF NEED
APPLICATION CONTENT
REQUIREMENTS**

I. INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, Great River Energy, Minnesota Power, Otter Tail Power Company, and Western Minnesota Municipal Power Agency (collectively, the Applicants) respectfully submit this request for exemptions from certain content requirements for the Certificate of Need Application for the Bison – Alexandria 345 kilovolt (kV) Transmission Project (Project) pursuant to Minn. Rule 7849.0200, subp. 6.

The Project involves adding a new 345 kV transmission circuit on existing transmission line structures from the existing Bison Substation near Fargo, North Dakota to the existing Alexandria Substation near Alexandria, Minnesota. The existing 345 kV structures were previously permitted and constructed as double-circuit capable as part of the Fargo to St. Cloud 345 kV Transmission Project.¹ The proposed 345 kV transmission line will traverse Wilkin, Otter Tail, Grant, Douglas, and Clay counties.

The Applicants believe that certain Certificate of Need Application content requirements in Minn. R. Ch. 7849 should be modified to better address the nature of the Applicants and the need for this Project. The Minnesota Public Utilities Commission (Commission) has granted similar exemptions for other transmission line

¹ *In the Matter of the Application for a Route Permit for the Fargo – St. Cloud 345 kV Transmission Project*, Docket No. E002, ET2/TL-09-1056, FINDING OF FACT, CONCLUSIONS OF LAW, AND ORDER ISSUING AN HVTL ROUTE PERMIT TO XCEL ENERGY AND GREAT RIVER ENERGY (June 24, 2011).

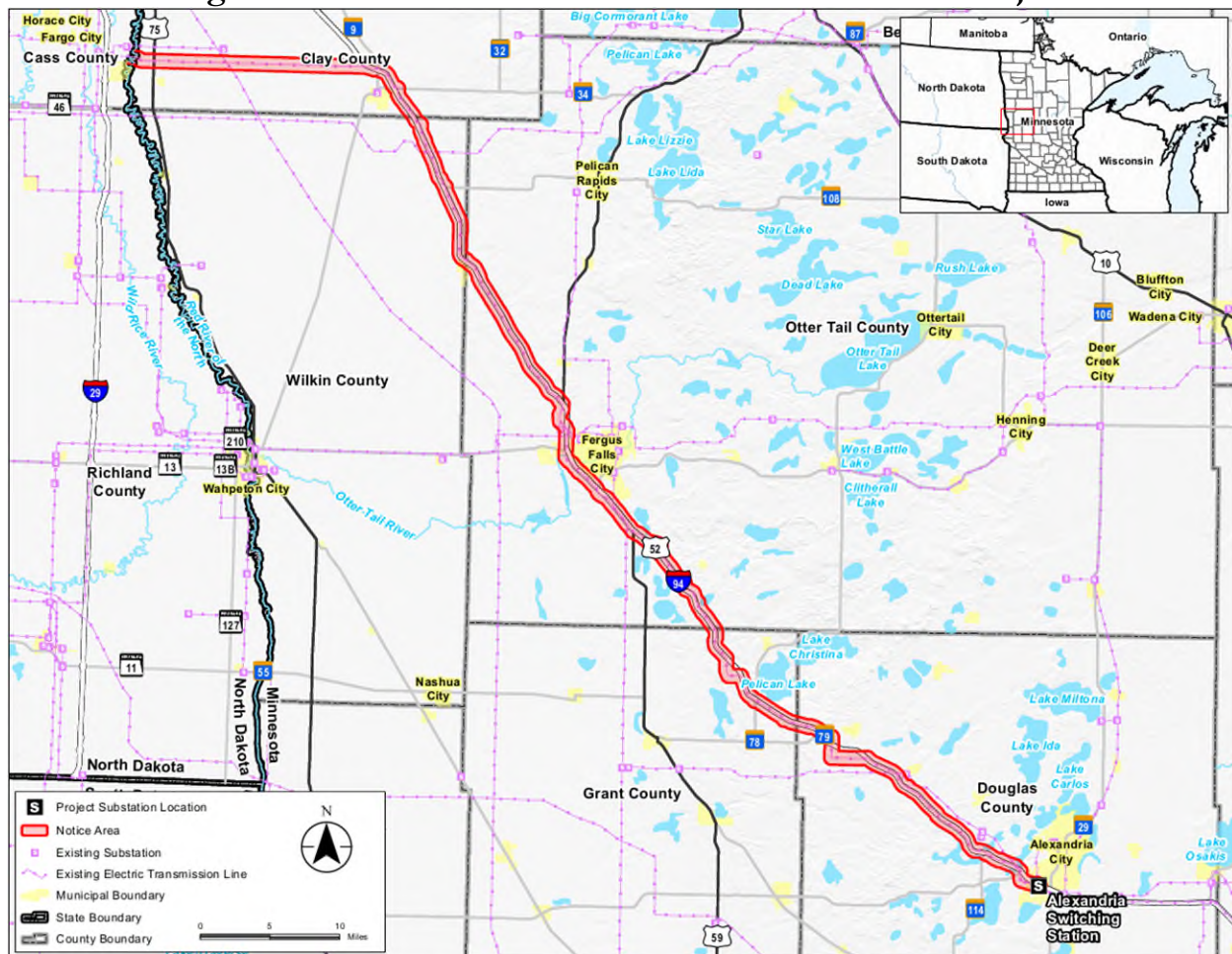
projects in the recent past.² The Applicants therefore respectfully request that the Commission grant exemptions for certain requirements as provided under Minn. R. 7849.0200, subp. 6. In lieu of some content requirements, the Applicants propose to submit alternative information that will better inform the Commission's decision regarding the need for the Project.

II. BACKGROUND

The Project is a Large Energy Facility as defined by Minn. Stat. § 216B.2421, subd. 2(2) because the Project is a 345 kV transmission line that has more than one mile in length in Minnesota. **Figure 1** below shows the endpoints for the Project as well as other existing transmission facilities of note in the area.

² See, e.g., *In the Matter of the Application Completeness Certificate of Need for Two Gen-Tie Lines from Sherburne County to Lyon County, Minnesota*, Docket No. E-002/CN-22-131, ORDER APPROVING NOTICE PLAN AND GRANTING THE VARIANCES AND EXEMPTIONS (May 2, 2023); *In the Matter of the Application for a Certificate of Need for the Big Stone South – Alexandria – Big Oaks Transmission Project*, Docket No. E-017, ET-2, E-002, ET-10, E-015/CN-22-538, ORDER APPROVING THE REQUESTED EXEMPTIONS AND THE NOTICE PLAN (April 19, 2023); *In the Matter of the Application of Minnesota Power and Great River Energy for a Certificate of Need for the Northland Reliability Project 345 kV Transmission Line*, Docket No. E015, ET2/CN-22-416, ORDER APPROVING THE REQUESTED EXEMPTIONS AND THE NOTICE PLAN (June 21, 2023)).

Figure 1. Bison – Alexandria 345 kV Transmission Project



The Project was studied, reviewed, and approved by the Midcontinent Independent System Operator, Inc. (MISO) ³ as part of its Long-Range Transmission Planning (LRTP) Tranche 2.1 portfolio of projects included in MISO's 2024 Transmission Expansion Plan (MTEP24). The LRTP Tranche 2.1 portfolio is made up of 24 projects, including project no. 19, the Bison to Alexandria 345 kV Transmission Project.⁴ The Applicants filed a notice of intent to construct, own, and maintain the Project with the Commission on February 7, 2025.⁵

The LRTP Tranche 2.1 portfolio will provide significant benefits to the Midwest subregion of the MISO footprint by facilitating more reliable, safe, and affordable

³ MISO is a member-based non-profit regional transmission organization (RTO) that is responsible for the planning and operation of transmission grid and wholesale energy market across 15 states and the Canadian province of Manitoba. MISO's members include 48 transmission owners with more than 65,800 miles of transmission lines and \$34.5 billion in transmission assets that are under MISO's functional control.

⁴ A copy of MTEP24 is available online at: <https://cdn.misoenergy.org/MTEP24%20Full%20Report658025.pdf>

⁵ See Notice of Intent to Construct, Own, and Maintain the Bison-Alexandria 345 kV Transmission Line Project, Docket No. E002, ET2, E015, E017, ET6135/CN-25-116 (Feb. 7, 2025) (eDocket No. [20252-215108-01](https://www.elsa.com/20252-215108-01)).

energy delivery. The Project is a key part of the LRTP Tranche 2.1 portfolio. The Project is needed to address reliability concerns and to increase the transmission capacity of this portion of the transmission system to provide greater generation outlet for generation resources in Western Minnesota, North Dakota, and South Dakota.

III. LEGAL STANDARD AND SUMMARY EXEMPTION

The content requirements for a Certificate of Need application for a large high-voltage transmission line (LHVTL) are specified in Minn. Rule 7849.0220, subp. 2, Minn. Rule 7849.0240, and Minn. Rules 7849.0260 to 7849.0340. The Commission has authority to grant exemptions from the requirements of Minn. Rules Chapter 7849 pursuant to Minn. Rule 7849.0200, subp. 6, which provides:

Subp. 6 Exemptions. Before submitting an application, a person is exempted from any data requirement of parts 7849.0010 to 7849.0400 if the person (1) requests an exemption from specific rules, in writing to the commission, and (2) shows that the data requirement is unnecessary to determine the need for the proposed facilities or may be satisfied by submitting another document. A request for exemption must be filed at least 45 days before submitting an application. The commission shall respond in writing to a request for exemption within 30 days of receipt and include the reasons for the decision. The commission shall file a statement of exemptions granted and reasons for granting them before beginning the hearing.

Based on the standard set forth in this rule, the Commission may grant exemptions when the data requirements: (1) are unnecessary to determine need in a specific case; or (2) can be satisfied by submitting documents other than those required by the rules.⁶

The Applicants specifically request that the Commission grant exemptions from the following rules as they are either unnecessary to determine the need for the Project or can be satisfied by submitting alternative data:

⁶ *In the Matter of the Application for a Certificate of Need for the Appleton – Canby 115 kV Line*, Docket No. E-017/CN-06-0677, ORDER GRANTING EXEMPTIONS AND APPROVING NOTICE PLAN (Aug. 1, 2006).

Minn. Rule	Scope of Exemption
Minn. Rule 7849.0260 (A)(3) and C(6) (Losses)	Request exemption from providing line-specific loss information. The Applicants propose to provide substitute data in the form of overall system losses.
Minn. R. 7849.0260 (B)(4) and (8) (Transmission Lines with Different Terminals or Substations)	Request an exemption from providing a discussion on the availability of alternative transmission lines with different terminals or substations. The Commission must not require evaluation of alternative end points for a high-voltage transmission line qualifying as a large energy facility unless the alternative end points are (i) consistent with end points identified in a federally registered planning authority transmission plan, or (ii) otherwise agreed to for further evaluation by the applicant. ⁷
Minn. R. 7849.0260 (C)(5) (Effect on Rates Systemwide and in Minnesota)	Request an exemption from providing estimate of effect on rates systemwide and in Minnesota. The Applicants propose to instead provide estimated Project costs, information regarding how the costs for LRTP projects are shared within the MISO footprint, and Xcel Energy will provide an annual revenue requirement impact for the capital costs of the Project for a 20-year period.
Minn. Rule 7849.0270, subps. (1) through (6) (Forecasting)	Request exemption from providing specific forecasting and capacity information. The Applicants propose to provide substitute forecast information used in analyzing the need for the Project.

⁷ See Minn. Stat. § 216B.243, subd. 3(6).

Minn. Rule 7849.0270, subp. 2(E) (Annual Revenue Requirements)	Request exemption from providing annual revenue requirements for the Project. The Applicants propose to provide information regarding how the costs for LRTP projects are shared within the MISO footprint and Xcel Energy will provide an annual revenue requirement impact for the capital costs of the Project for a 20-year period.
Minn. Rule 7849.0280, subps. (B) through (I) (System Capacity)	Request full exemption from providing a discussion of the ability of the existing system to meet the forecasted demand for electrical energy identified in response to Minn. Rule 7849.0270.
Minn. Rule 7849.0290 (Conservation)	Request exemption from discussing conservation programs and their effect on the forecast information required by Minn. Rule 7849.0270. The Applicants propose to provide substitute information related either to their conservation programs or to the conservation programs that are available to their members ⁸ serving load in Minnesota. The Applicants will also provide information regarding how conservation and energy efficiency was considered by MISO in its evaluation of the Project.
Minn. Rule 7849.0300 (Consequences of Delay); Minn. Rule 7849.0340 (No Facility Alternative)	Request to be exempt from providing analysis using three confidence levels. The Applicants propose to provide substitute data regarding potential impacts caused by delay or by not building the Project.

⁸ Western Minnesota Municipal Power Agency owns generation and transmission facilities, the capacity and output of which are sold to Missouri River Energy Services. Missouri River Energy Services provides energy and energy services to its 61 member municipal utilities, including conservation program services.

Attachment A to this filing summarizes all of the Certificate of Need content requirements and identifies the requirements for which an exemption is being requested and whether the Applicants intend to provide substitute data. Each of these exemption requests is discussed in more detail below. This request is being made at least 45 days prior to submitting an application for a Certificate of Need as required by Minn. Rule 7849.0200, subp. 6.

IV. EXEMPTIONS REQUESTED

A. Minn. Rules 7849.0260(A)(3) and C(6) – Losses

Minn. Rule 7849.0260(A)(3) requires the applicant to provide the expected losses “under projected maximum loading and under projected average loading in the length of the transmission line and at the terminals or substations.” Subpart C(6) of the rule requires similar information (efficiency of proposed system under maximum and average loading along the length of the line). The electrical grid operates as a single, integrated system, which prevents electricity from being “directed” along a particular line or set of lines. Consequently, losses take place across the entire transmission system and is not isolated to a few transmission lines within the integrated regional electric grid. It is necessary, therefore, to calculate losses across the system affected by the addition of new transmission lines, rather than the losses attributable to the transmission addition itself.

The Applicants request an exemption from Minn. Rules 7849.0260(A)(3)) and C(6) and propose to provide system losses in lieu of line-specific losses required by the rules. Our proposal is consistent with the approach previously approved by the Commission in several other Certificate of Need transmission line dockets.⁹

B. Minn. Rule 7849.0260(B)(4) and B(8) – Transmission Lines with Different Terminals or Substations

Minnesota Rule 7849.0260(B)(4) requires a discussion of “transmission lines with different terminals or substations.” Likewise, subpart (B)(8) of that rule requires a discussion of “any reasonable combination of the alternatives” listed in, among

⁹ *In the Matter of the Application for a Certificate of Need for the Big Stone South – Alexandria – Big Oaks Transmission Project*, Docket No. E-017, ET-2, E-002, ET-10, E-015/CN-22-538, ORDER GRANTING CERTIFICATE OF NEED AND ISSUING ROUTE PERMIT (Oct. 30, 2024); *In the Matter of the Application of Xcel Energy for a Certificate of Need for Two Gen-Tie Lines From Sherburne County to Lyon County, Minnesota*, Docket No. E002/CN-22-131, ORDER (June 28, 2022); *In the Matter of the Application of Xcel Energy and ITC Midwest, LLC for the Huntley - Wilmarth 345 KV Transmission Line Project*, Docket No. E002,ET-6675/CN-17-184, ORDER (September 1, 2017); *In the Matter of the Application of Northern States Power Company d/ b/ a Xcel Energy for a Certificate of Need for the Upgrade of the Southwest Twin Cities Bluff Creek – Westgate Area 69 kV Transmission Line to 115 kV Capacity*, Docket No. E002/CN-11-332, ORDER GRANTING APPLICANT’S EXEMPTION REQUEST (Nov. 16, 2011).

others, subpart (B)(4). Minn. Stat. § 216B.243, subd. 3(6), however, states that “the [C]ommission must not require evaluation of alternative end points for a high-voltage transmission line qualifying as a large energy facility unless the alternative end points are (i) consistent with end points identified in a federally registered planning authority transmission plan, or (ii) otherwise agreed to for further evaluation by the applicant.” The only end points identified in the MISO MTEP24 definition for the Project are those proposed by the Applicants, and the Applicants have not agreed to an evaluation of an alternative. Thus, the Applicants request an exemption from analyzing alternative endpoints for the Project consistent with Minn. Stat. § 216B.243, subd. 3(6).

C. Minn. R. 7849.0260(C)(5) – Effect on Rates Systemwide and in Minnesota

Minn. Rule 7849.0260(C)(5) requires the applicant to provide for the proposed facility and each alternative “an estimate of its effect on rates systemwide and in Minnesota, assuming a test year beginning with the proposed in-service date.” The Applicants request an exemption from this rule and propose instead to provide estimated costs for the Project, general information regarding how the costs for LRTP projects are allocated across the MISO footprint, and Xcel Energy will provide an annual revenue requirement impact for the capital costs of the Project for a 20-year period. This substitute information will provide the Commission with the necessary information on the costs of the Project and how these costs will be allocated to Minnesota. This is similar to the information that was provided in other recent Certificate of Need proceedings.¹⁰

D. Minn. Rules 7849.0270, subps. 1 through 6 – Forecasting

The Applicants seek an exemption from the content requirements of Minn. Rule 7849.0270, subps. 1-6 which concerns forecasting information. Instead, the Utilities propose to provide substitute forecast information that was used by MISO and the Applicants in studying, planning, and analyzing the Project. This data will include the PROMOD analyses MISO used in the MTEP24. This substitute data will better inform the record than the specific forecast data identified in this Rule.

¹⁰ *In the Matter of the Application for a Certificate of Need for the Big Stone South – Alexandria – Big Oaks Transmission Project*, Docket No. E-017, ET-2, E-002, ET-10, E-015/CN-22-538, CERTIFICATE OF NEED APPLICATION at 31 (Sept. 29, 2023) (“Minn. R. 7849.0260, subp. C(5), requires Applicants to provide an estimate of the Project’s effect on rates system wide and in Minnesota. To fulfill this requirement, the Applicants are also providing the annual revenue requirement impact for the capital costs of the Project for a 20-year period for Xcel Energy customers starting with the MISO approved in-service date of June 1, 2030. While the rate impact for customers of other utilities would be different, this analysis provides an estimate of effect of the Project on rates.”).

The Commission's rules addressing Certificate of Need content requirements were designed decades ago at a time when the transmission improvements under consideration were typically driven by growing demand for electricity and linked directly to a specific generator proposed to meet that need. Consequently, the rules were designed around the concept that a utility provide detailed forecasts of power demand and electricity consumption to demonstrate the need for a specific generating plant that, in turn, justified the need for the proposed transmission capacity.

The Project is needed for multiple reasons including addressing thermal and voltage issues and to provide additional transmission capacity to integrate renewable generation in the region. Rather than providing the forecasting information required by Minn. Rule 7849.0270, the Applicants will provide information regarding the forecasts used by MISO and the Applicants to assess the need for the Project which will better inform the record in this proceeding.

The Commission has previously granted the same exemption request for a similar transmission line project.¹¹

E. Minn. Rules 7849.0270, subp. 2(E) – Annual Revenue Requirements

Minn. Rule 7849.0270, subp. 2(E) requires an estimate of the “annual revenue requirement per kilowatt-hour for the system in current dollars.” The Applicants request an exemption from this rule and propose instead to provide general information regarding how the costs for LRTP projects are shared within the MISO footprint and Xcel Energy will provide an annual revenue requirement impact for the capital costs of the Project for a 20-year period. This substitute information will better inform the record regarding the need and cost of the entire LRTP Tranche 2.1 portfolio.

The Commission has previously granted the same exemption request for a similar transmission line project.¹²

F. Minn. Rule 7849.0280, subps. (B) through (I) – System Capacity

Minn. Rule 7849.0280, subps. (B) through (I) pertain to system capacity and generation data. The general purpose of this section is to provide a discussion of the ability of the existing system to meet the forecasted demand for electrical energy in response to Minn. Rule 7849.0270. However, Minn. Rule 7849.0270, subps. (B) through (I) pertain to an examination of generation adequacy and do not address transmission planning

¹¹ *In the Matter of the Application for a Certificate of Need for the Big Stone South – Alexandria – Big Oaks Transmission Project*, Docket No. E-017, ET-2, E-002, ET-10, E-015/CN-22-538, ORDER APPROVING THE REQUESTED EXEMPTIONS AND THE NOTICE PLAN (April 19, 2023).

¹² *Id.*

considerations. The Applicants request that the Commission grant an exemption to Minn. Rule 7849.0280, subps. (B) through (I). The Commission has previously granted exemption requests from Minn. Rule 7849.0280, subps. (B) through (I) in several other transmission line Certificate of Need dockets where, as here, issues of transmission adequacy, rather than generation adequacy, were at issue.¹³

G. Minn. Rule 7849.0290 – Conservation Programs

Minn. Rule 7849.0290 requires a Certificate of Need application to provide information related to conservation programs the applicant has in place and their effect on the forecast information required by Minn. Rule 7849.0270. The Applicants request an exemption from Minn. Rule 7849.0290 and instead will provide substitute information related either to their conservation programs or to the conservation programs that are available to their members serving load in Minnesota. The Applicants will also provide information regarding how conservation and energy efficiency was considered by MISO in its evaluation of the Project. This information will better inform the record as to the need for the Project.

The Commission has previously granted the same exemption request for a similar project.¹⁴

H. Minn. Rule 7849.0300 – Consequences of Delay and Minn. Rule 7849.0340 – No Facility Alternative

Minn. Rule 7849.0300 requires detailed information regarding the consequences of delay on three specific statistically-based levels of demand and energy consumption. Minn. Rule 7849.0340 requires a discussion of the impact on existing generation and transmission facilities at the three levels of demand specified in Minn. Rule 7849.0300 for the no-build alternative. Such a discussion is an important element of a determination of the need for new transmission infrastructure. While the Applicants will evaluate the consequences of delay and a no build alternative, the Applicants request a variance from the portions of these rules that require the examination to incorporate the three specific levels of demand required by Minn. Rule 7849.0300. The same or similar requests for exemptions from the requirements of Minn. Rules

¹³ *Id.* See also *In the Matter of the Application of Xcel Energy for a Certificate of Need for Two Gen-Tie Lines From Sherburne County to Lyon County, Minnesota*, Docket No. E002/CN-22-131, ORDER APPROVING NOTICE PLAN AND GRANTING THE VARIANCES AND EXEMPTIONS (May 2, 2023); *In the Matter of the Application of Minnesota Power for a Certificate of Need for the HVDC Modernization Project*, Docket No. E015/CN-22-607, ORDER (Feb. 1, 2023) (approving applicant's exemption requests through the Commission's consent agenda).

¹⁴ *In the Matter of the Application for a Certificate of Need for the Big Stone South – Alexandria – Big Oaks Transmission Project*, Docket No. E-017, ET-2, E-002, ET-10, E-015/CN-22-538, ORDER APPROVING THE REQUESTED EXEMPTIONS AND THE NOTICE PLAN (April 19, 2023).

7849.0300 and 7849.0340 were approved by the Commission in other recent transmission line Certificate of Need dockets.¹⁵

V. CONCLUSION

The Applicants respectfully request that the Commission grant the exemptions requested herein so that the Certificate of Need application provides focused information to evaluate the need for the proposed Project.

¹⁵ *Id.*; See also *In the Matter of the Application of Xcel Energy for a Certificate of Need for Two Gen-Tie Lines From Sherburne County to Lyon County, Minnesota*, Docket No. E002/CN-22-131, ORDER APPROVING NOTICE PLAN AND GRANTING THE VARIANCES AND EXEMPTIONS (May 2, 2023); *In the Matter of the Application of Minnesota Power for a Certificate of Need for the HVDC Modernization Project*, Docket No. E015/CN-22-607, ORDER (Feb. 1, 2023) (approving applicant's exemption requests through the Commission's consent agenda).

Dated: August 15, 2025

Respectfully submitted,

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**WESTERN MINNESOTA MUNICIPAL
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Certificate of Need Application Completeness Checklist

AUTHORITY	REQUIRED INFORMATION	EXEMPTION REQUESTED?
Minn. R. 7829.2500, subp. 2	Brief summary of filing on separate page sufficient to apprise potentially interested parties of its nature and general content	No
Minn. R. 7849.0200, subp. 2	Title Page and Table of Contents	No
Minn. R. 7849.0200, subp. 4	Cover Letter	No
Minn. R. 7849.0220, subp. 3	Joint Ownership and Multiparty use	No
Minn. R. 7849.0240	Need summary and additional considerations	No
subp. 1	Summary of the major factors that justify the need for the proposed facility	No
subp. 2	Relationship of the proposed facility to the following socioeconomic considerations:	–
A.	Socially beneficial uses of the output of the facility	No
B.	Promotional activities that may have given rise to the demand for the facility	No
C.	Effects of the facility in inducing future development	No
Minn. R. 7849.0260	Proposed LHVTL and Alternatives	–
A.	A description of the type and general location of the proposed line, including:	–
(1)	Design voltage	No
(2)	Number, sizes and types of conductors	No

Attachment A

AUTHORITY	REQUIRED INFORMATION	EXEMPTION REQUESTED?
(3)	Expected losses under projected maximum loading and under projected average loading in the length of the line and at terminals or substations	Exemption Requested The Applicants request to be exempt from providing line-specific loss information. The Applicants propose to provide substitute data in the form of overall system losses.
(4)	Approximate length of the proposed line	No
(5)	Approximate locations of DC terminals or AC substations on a map	No
(6)	List of likely affected counties	No
B.	Discussion of the available alternatives including:	–
(1)	New generation	No
(2)	Upgrading existing transmission lines	No
(3)	Transmission lines with different voltages or conductor arrays	No
(4)	Transmission lines with different terminals or substations	Exemption Requested The Applicants request to be exempt from discussing the availability of alternative transmission lines with different terminals or substations. ¹⁶
(5)	Double circuiting of existing transmission lines	No
(6)	If facility for DC (AC) transmission, an AC (DC) transmission line	No
(7)	If proposed facility is for overhead (underground) transmission, an underground (overhead) transmission line	No
(8)	Any reasonable combination of alternatives (1) – (7)	Exemption Requested The Applicants request to be exempt from discussing the availability of alternative

¹⁶ See Minn. Stat. § 216B.243, subd. 3(6).

Attachment A

AUTHORITY	REQUIRED INFORMATION	EXEMPTION REQUESTED?
		transmission lines with different terminals or substations. ¹⁷
C.	For the facility and for each alternative in B, a discussion of:	–
(1)	Total cost in current dollars	No
(2)	Service life	No
(3)	Estimated average annual availability	No
(4)	Estimated annual O&M costs in current dollars	No
(5)	Estimate of its effect on rates system wide and in Minnesota	Exemption Requested The Applicants propose to provide Project cost information, general information regarding how the costs for LRTP projects are shared within the MISO footprint, and Xcel Energy will provide an annual revenue requirement impact for the capital costs of the Project for a 20-year period.
(6)	Efficiency	Exemption Requested The Applicants request to be exempt from providing line-specific loss information. The Applicants propose to provide substitute data in the form of overall system losses.
(7)	Major assumptions made in subitems (1) – (6)	No
D.	A map (of appropriate scale) showing the applicant's system or load center to be served by the proposed LHVTL	No
E.	Such other information about the proposed facility and each alternative as may be relevant to determination of need.	No
Minn. R. 7849.0270	Content of Forecast	–

¹⁷ See Minn. Stat. § 216B.243, subd. 3(6).

Attachment A

AUTHORITY	REQUIRED INFORMATION	EXEMPTION REQUESTED?
Minn. R. 7849.0270, subp. 1	Peak demand and annual consumption data	Exemption Requested The Applicants request to be exempt from providing specific forecasting and capacity information. The Applicants propose to provide substitute forecast information used in analyzing the need for the Project.
Minn. R. 7849.0270, subp. 2	For each forecast year the following data:	—
A.	Minnesota forecast data	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
B.	Estimates of the number of ultimate consumers and annual electrical consumption by those consumers:	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
(1)	Farm, excluding irrigation and drainage pumping	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
(2)	Irrigation and drainage pumping	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
(3)	Nonfarm residential	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
(4)	Commercial	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
(5)	Mining	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
(6)	Industrial	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
(7)	Street and highway lighting	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
(8)	Electrified transportation ¹⁸	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
(9)	Other	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
(10)	Sum of subitems (1) – (9)	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1

¹⁸ Electrified transportation is included in the column labeled “other.”

Attachment A

AUTHORITY	REQUIRED INFORMATION	EXEMPTION REQUESTED?
C.	Estimate of the demand for power in system at the time of annual system peak demand	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
D.	System peak demand by month	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
E.	Estimated annual revenue requirement per kWh in current dollars	Exemption Requested The Applicants request to be exempt from providing annual revenue requirements for the Project. The Applicants propose to provide general information regarding how the costs for LRTP projects are shared within the MISO footprint and Xcel Energy will provide an annual revenue requirement impact for the capital costs of the Project for a 20-year period.
F.	Estimated average weekday load factor by month	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
Minn. R. 7849.0270, subp. 3	Forecast Methodology	—
	Detail of forecast methodology including:	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
A.	Overall methodological framework used	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
B.	Specific analytical used	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
C.	Manner in which specific techniques are related in producing the forecast	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
D.	Where statistical techniques are used:	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
(1)	Purpose of the technique	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
(2)	Typical computations	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
(3)	Results of statistical tests	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1

Attachment A

AUTHORITY	REQUIRED INFORMATION	EXEMPTION REQUESTED?
E.	Forecast confidence levels for annual peak demand and annual electrical consumption	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
F.	Brief analysis of methodology including:	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
(1)	Strengths and weaknesses	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
(2)	Suitability to the system	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
(3)	Cost considerations	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
(4)	Data requirements	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
(5)	Past accuracy	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
(6)	Other significant factors	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
G.	Explanation of discrepancies	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
Minn. R. 7849.0270, subp. 4	Discussion of data base used for forecasts including:	—
A.	List of data sets including a brief description of each	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
B.	Identification of adjustments made to raw data including nature, reason and magnitude	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
Minn. R. 7849.0270, subp. 5	Assumptions and Special Information	—
	Discussion of each essential assumption including need and nature of assumption and sensitivity of forecast results to assumptions	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
	Discussion of assumptions regarding:	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
A.	Availability of alternative sources of energy	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1

Attachment A

AUTHORITY	REQUIRED INFORMATION	EXEMPTION REQUESTED?
B.	Expected conversion from other fuels to electricity or vice versa	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
C.	Future prices for customers and their effect on demand	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
D.	Data requested in subp. 2 not historically available or generated by applicant for demand forecast	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
E.	Effect of energy conservation programs on long term demand	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
F.	Other factors considered when preparing forecast	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
Minn. R. 7849.0270, subp. 6	Coordination of Forecasts with Other Systems	—
A.	Extent of coordination of load forecasts with those of other systems	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
B.	Description of the manner in which those forecasts are coordinated	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
Minn. R. 7849.0280	System Capacity	—
	Description of ability of existing system to meet demand forecast including:	—
A.	Power planning programs	No
B.	Seasonal firm purchases and sales	Exemption Requested
C.	Seasonal participation purchases and sales	Exemption Requested
D.	For each forecast year load and generating capacity for:	Exemption Requested
(1)	Seasonal system demand	Exemption Requested
(2)	Annual system demand	Exemption Requested

Attachment A

AUTHORITY	REQUIRED INFORMATION	EXEMPTION REQUESTED?
(3)	Total seasonal firm purchases	Exemption Requested
(4)	Total seasonal firm sales	Exemption Requested
(5)	Seasonal adjusted net demand	Exemption Requested
(6)	Annual adjusted net demand	Exemption Requested
(7)	Net generating capacity	Exemption Requested
(8)	Total participation purchases	Exemption Requested
(9)	Total participation sales	Exemption Requested
(10)	Adjusted net capability	Exemption Requested
(11)	Net reserve capacity obligation	Exemption Requested
(12)	Total firm capacity obligation	Exemption Requested
(13)	Surplus or deficit capacity	Exemption Requested
E.	Summer and winter season load generation and capacity in years subsequent to application contingent on proposed facility	Exemption Requested
F.	Summer and winter season load generation and capacity including all projected purchases, sales and generation in years subsequent to application	Exemption Requested
G.	List of proposed additions and retirements in generating capacity for each forecast year subsequent to application	Exemption Requested
H.	Graph of monthly adjusted net demand and capability with difference between capability and maintenance outages plotted	Exemption Requested
I.	Appropriateness and method of determining system reserve margins	Exemption Requested

Attachment A

AUTHORITY	REQUIRED INFORMATION	EXEMPTION REQUESTED?
Minn. R. 7849.0290	Conservation Programs	—
A.	Persons responsible for energy conservation and efficiency programs	Exemption Requested The Applicants request to be exempt from discussing conservation programs and their effect on the forecast information required by Minn. R. 7849.0270. The Applicants propose to provide substitute information related either to their conservation programs or to the conservation programs that are available to their members serving load in Minnesota. The Applicants will also provide information regarding how conservation and energy efficiency was considered by MISO in its evaluation of the Project.
B.	List of energy conservation and efficiency goals and objectives	Exemption Requested
C.	Description of programs considered, implemented and rejected	Exemption Requested
D.	Description of major accomplishments in conservation and efficiency	Exemption Requested
E.	Description of future plans with respect to conservation and efficiency	Exemption Requested
F.	Quantification of the manner by which these programs impact the forecast	Exemption Requested
Minn. R. 7849.0300	Consequence of Delay	Exemption Requested The Applicants request to be exempt from providing analysis using three confidence levels. The Applicants propose to provide substitute data regarding potential impacts caused by delay in building the Project.
Minn. R. 7849.0310	Required Environmental Information	No

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AUTHORITY	REQUIRED INFORMATION	EXEMPTION REQUESTED?
Minn. R. 7849.0330	Transmission Facilities	—
	Data for each alternative that would require LHVTL construction including:	—
A.	For overhead transmission lines	—
(1)	Schematics showing dimensions of support structures	No
(2)	Discussion of electric fields	No
(3)	Discussion of ozone and nitrogen oxide emissions	No
(4)	Discussion of radio and television interference	No
(5)	Discussion of audible noise	No
B.	For underground transmission facilities:	N/A
(1)	Types and dimensions of cable systems	N/A
(2)	Types and qualities of cable system materials	N/A
(3)	Heat released in kW per foot of cable	N/A
C.	Estimated right-of-way required for the facility	No
D.	Description of construction practices	No
E.	Description of O&M practices	No
F.	Estimated workforce required for construction and O&M	No

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AUTHORITY	REQUIRED INFORMATION	EXEMPTION REQUESTED?
G.	Description of region between endpoints in likely area for routes emphasizing a three-mile radius of endpoints including:	No
(1)	Hydrological features	No
(2)	Vegetation and wildlife	No
(3)	Physiographic regions	No
(4)	Land use types	No
Minn. R. 7849.0340	No-Facility Alternative	Exemption Requested The Applicants request to be exempt from providing analysis using three confidence levels. The Applicants propose to provide substitute data regarding potential impacts caused by not building the Project.

*IN THE MATTER OF THE APPLICATION FOR
A CERTIFICATE OF NEED FOR THE BISON TO
ALEXANDRIA SECOND CIRCUIT 345 kV
TRANSMISSION LINE PROJECT*

DOCKET NO. E002, ET2, E015, E017,
ET6135/CN-25-116

CERTIFICATE OF SERVICE

Gustav Gerhardson certifies that on the 15th day of August, 2025, on behalf of Northern States Power Company, doing business as Xcel Energy, Great River Energy, Minnesota Power, Otter Tail Power Company, and Western Minnesota Municipal Power Agency, he efiled a true and correct copy of the **EXEMPTION REQUEST** by posting the same on [eDockets](#). Said filing is also served via email or U.S. Mail as designated on the attached Service List on file with the Minnesota Public Utilities Commission in the above-referenced docket number.

/s/ Gustav Gerhardson

Gustav Gerhardson

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