



Appendix A

Completeness Checklist

Gopher to Badger Link Transmission Line Project
Certificate of Need Application
Completeness Checklist

Authority	Required Information	Location in Application	Exemption Requested
Minn. R. 7849.0200, subp. 6	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 specified rules, in writing to the commission, and (2) shows that the data requirement is unnecessary to determine the need for the proposed facility or may be satisfied by submitting another document. A request for exemption must be filed at least 45 days before submitting an application.	Filed in Docket no. 25-121 on October 8, 2025 eDocket No. 202510-223688-03	
Minn. R. 7849.0220, Subp. 2	Each application for a certificate of need for an LHVTL shall include all of the information required by parts 7849.0240 and 7849.0260 to 7849.0340.	This Application	
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.	One-page summary	
Minn. R. 7849.0200, subp. 2	Title Page and Table of Contents	Table of Contents	
Minn. R. 7849.0200, subp. 4	Cover Letter	Cover Letter	
Minn. R. 7849.0220, subp. 3	Joint Ownership and Multiparty use	1.1; 1.3	
Minn. R. 7849.0230	Designation of certain information included in a Certificate of Need application be considered a "Draft environmental report"		Exemption requested; Applicants comply with the environmental review process set forth in Minn. R. 7849.1000-.2100
Minn. R. 7849.0240	Need summary and additional considerations	—	
Subp. 1	Summary of the major factors that justify the need for the proposed facility	1.4; 1.5	
Subp. 2	Relationship of the proposed facility to the following socioeconomic considerations:	—	
A.	Socially beneficial uses of the output of the facility, including its uses to protect or enhance environmental quality;	6.5.3	
B.	Promotional activities that may have given rise to the demand for the facility; and	6.8	

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C.	Effects of the facility in inducing future development.	6.9	
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;	2.1	
(2)	Number, sizes and types of conductors;	2.2.3	
(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; substitute information included in Section 6.6.4
(4)	Approximate length of the proposed line;	1.2.1	
(5)	Approximate locations of DC terminals or AC substations on a map; and	Figure 1.8-1 and Section 2.4	
(6)	List of likely affected counties.	1.2; 2.0	
B.	Discussion of the available alternatives including:	—	
(1)	New generation of various technologies, sizes, and fuel types;	7.3	
(2)	Upgrading existing transmission lines;	7.4.1	
(3)	Transmission lines with different voltages or conductor arrays;	7.2	
(4)	Transmission lines with different terminals or substations;		Full exemption requested
(5)	Double circuiting of existing transmission lines;	7.4.3	
(6)	If facility for DC (AC) transmission, an AC (DC) transmission line;	7.4.4	
(7)	If proposed facility is for overhead (underground) transmission, an underground (overhead) transmission line; and	7.4.5	
(8)	Any reasonable combination of alternatives (1) – (7).	7.5	Exemption requested from analysis of transmission lines with end points different than those identified by MISO
C.	For the proposed facility and for each of the alternatives provided in response to item B that could provide electric power at the asserted level of need, a discussion of:	—	
(1)	Total cost in current dollars;	2.5; Ch. 7	
(2)	Service life;	3.4.3; Ch. 7	
(3)	Estimated average annual availability;	9.5	

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(4)	Estimated annual O&M costs in current dollars;	2.5.2	
(5)	Estimate of its effect on rates system wide and in Minnesota assuming a test year beginning with the proposed in-service date;		Exemption requested; substitute information included in Chapter 2
(6)	Its efficiency, expressed for a transmission facility as the estimated losses under projected maximum loading and under projected average loading in the length of the transmission line and at the terminals or substations; and		Exemption requested; substitute information included in Section 6.6.4
(7)	Major assumptions made in subitems (1) – (6)	1.6; 2.5; 6.2.1; 7.1	
D.	A map (of appropriate scale) showing the applicant's system or load center to be served by the proposed LHVTL.		Exemption requested; substitute information included in Figure 1.8-1
E.	Such other information about the proposed facility and each alternative as may be relevant to determination of need.	This Application	
Minn. R. 7849.0270	Peak Demand and Annual Consumption Forecasts		Exemption requested; substitute information included in Chapters 1, 2, 5, 6, and Appendices D, E, and F
Subp. 1	Peak demand and annual consumption data within the applicant's service area and system		
Subp. 2	The following data for each forecast year:		
A.	Annual consumption by ultimate consumers within applicants' Minnesota service area;		
B.	Estimates of total ultimate consumers and their annual consumption for each of the following consumer categories:		
	Farm;		
	Irrigation and drainage pumping;		
	Nonfarm residential;		
	Commercial;		

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	Mining;		
	Industrial;		
	Street and highway lighting;		
	Electrified transportation;		
	Other (including municipal water pumping, oil/gas pipeline pumping, military, all other consumers not reported in subitems (1)-(8)); and		
	Sum of subitems (1)-(9);		
C.	An estimate of the demand for power in the applicant's system at the time of annual system peak demand, including an estimated breakdown of the demand into the consumer categories listed in item B;		
D.	Applicant's system peak demand by month;		
E.	Estimated annual revenue requirement/kWh for system in current dollars; and		
F.	Applicant's estimated average system weekday load factor by month;		
Subp. 3	Detail of forecast methodology employed, including:		
A.	Overall methodological framework that is used;		
B.	Specific analytical techniques used, their purpose, and components to which they were applied;		
C.	Manner in which specific techniques relate to forecast;		
D.	Where statistical techniques have been used:		
(1)	Purpose of technique;		
(2)	Typical computations, specifying variables and data; and		
(3)	Results of appropriate statistical tests;		
E.	Forecast confidence levels/ranges of accuracy for annual peak demand and consumption, and description of their derivation;		
F.	Brief analysis of methodology used, including		
	Strengths and weaknesses;		
	Suitability to the system;		
	Cost considerations;		
	Data requirements;		

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	Past accuracy; and		
	Other significant factors.		
G.	Explanation of discrepancies between application's forecast and applicant forecasts in other proceedings.		
Subp. 4	Data base used in forecast, including:		
A.	Complete list of all data used in forecast, including a brief description of each and how it was obtained;		
B.	Clear identification of any adjustments to raw data to adapt them for use in forecasting, including:		
	Nature of adjustment;		
	Reason for adjustment; and		
	Magnitude of adjustment		
Subp. 5	Essential forecast assumptions made regarding:		
A.	Availability of alternate sources of energy;		
B.	Expected conversion from other fuels to electricity or vice versa;		
C.	Future electricity prices in applicant's system and their effect on system demand;		
D.	Subpart 2 data that is not available historically nor created by applicant for forecast;		
E.	Effect of conservation programs on long-term demand; and		
F.	Any factor considered in preparing forecast.		
Subp. 6	Coordination of Forecasts		
A.	Extent of coordination of load forecasts with those of other systems	Ch. 5; Appendix F	
B.	Description of the manner in which those forecasts are coordinated	Ch. 5; Appendix F	
Minn. R. 7849.0280	System Capacity Description		
A.	A brief discussion of power planning programs, including criteria, applied to the applicant's system and to the power pool or area within which the applicant's planning studies are based.	1.4.2.2; 5.1; 5.2; 5.3; 6.2.1; 6.6	
B.	Brief discussion of power planning programs applied to applicant's system;		Full exemption requested
C.	Applicant's seasonal firm participation purchases/sales for each utility involved in each transaction for each forecast year;		Full exemption requested

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D.	Load and generation capacity data for sub-items below for summer and winter seasons for each forecast year, including anticipated purchases, sales, and capacity retirements/additions:		Full exemption requested
	Seasonal system demand;		
	Annual system demand;		
	Total seasonal firm purchases;		
	Total seasonal firm sales;		
	Seasonal adjusted net demand;		
	Annual adjusted net demand;		
	Net generating capacity;		
	Total participation purchases;		
	Total participation sales;		
	Adjusted net capability;		
	Net reserve capacity obligation;		
	Total firm capacity obligation; and		
	Surplus or deficit capacity.		
E.	Load and generation capacity data requested in item D/sub-items (1)-(13) for summer and winter seasons for each forecast year subsequent to the year of application, including purchases, sales, and generating capability contingent on the proposed facility;		Full exemption requested
F.	Load and generation capacity data requested in item D/sub-items (1)-(13) for summer and winter seasons for each forecast year subsequent to the year of application, including all projected purchases, sales, and generating capability;		Full exemption requested
G.	List of proposed additions/retirements in net generating capability for each forecast year subsequent to the year of application;		Full exemption requested
H.	Graph showing monthly adjusted net demand, monthly adjusted net capability, and difference between adjusted net capability and actual, planned, or estimated maintenance outages of generation/ transmission for specified time periods; and		Full exemption requested
I.	Discussion of method and appropriateness of determining system reserve margins.		Full exemption requested

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Minn. R. 7849.0290	Conservation Programs		Exemption requested; substitute information included in Chapters 5 and 7, and Appendix E and G
A.	Name of committee, department, individual responsible for applicant's energy conservation/efficiency programs, including load management;		
B.	List of applicant's conservation/efficiency goals and objectives;		
C.	Description of specific energy conservation/efficiency programs considered, a list of those implemented, and reasons why other programs have not been implemented;		
D.	Description of major energy conservation/efficiency accomplishments by applicant;		
E.	Description of applicant's energy conservation/efficiency plans through the forecast years; and		
F.	Quantification of how energy conservation/efficiency programs affect the 7849.0270, subp. 2 forecast, a list of total program costs, and discussion of expected program effects in reducing need for new generation and transmission.		
Minn. R. 7849.0300	Consequence of Delay (three levels of demand)		Exemption requested; substitute information included in Chapters 6 and 7
Minn. R. 7849.0310	Required Environmental Information	Chapter 10	
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 and conductor configurations for each type of support structure that may be used;	2.2.2; Appendix C	

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(2)	Discussion of the strength and distribution of the electric field attributable to the transmission facility, including the contribution of air ions if appropriate;	8.6	
(3)	Discussion of ozone and nitrogen oxide emissions;	8.2	
(4)	Discussion of radio and television interference; and	8.4	
(5)	Discussion of audible noise;	8.3	
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	1.2.1; 9.2	
D.	Description of construction practices	9.3; 9.4	
E.	Description of O&M practices	9.5; 9.6	
F.	Estimated workforce required for construction and O&M	2.5.2	
G.	Description of region between endpoints in likely area for routes emphasizing a three mile radius of endpoints including:		Exemption requested; substitute information included in Chapter 10
(1)	Hydrological features		
(2)	Vegetation and wildlife		
(3)	Physiographic regions		
(4)	Land use types		
Minn. R. 7849.0340	No-Facility Alternative (three levels of demand)		Exemption requested; substitute information included in Section 7.7