COMMERCE DEPARTMENT

February 24, 2026

Sasha Bergman
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: Comments of the Minnesota Department of Commerce
Docket No. E015, ET2, E017/CN-25-109

Dear Ms. Bergman:

Attached are the comments of the Minnesota Department of Commerce (Department) in the following matter:

In the Matter of the Application for a Certificate of Need for the Maple River to Cuyuna 345 kV Transmission Line Project.

The petition was filed by Minnesota Power, Great River Energy, and Otter Tail Power Company on January 30, 2026.

The Department recommends **the petition be declared substantially complete** and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Dr. SYDNIE LIEB
Assistant Commissioner of Regulatory Analysis

DZ/RP
Attachment

COMMERCE DEPARTMENT

Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. E015, ET2, E017/CN-25-109

I. INTRODUCTION

Minnesota Power, Great River Energy, and Otter Tail Power Company (collectively, the Applicants) submitted to the Minnesota Public Utilities Commission (Commission) the Applicants' *Certificate of Need* (CN or petition) for the proposed Maple River to Cuyuna 345 kilovolt (kV) Transmission Project.[1] The proposed project is expected to be in service no later than 2033. A map of the project is included as Attachment 2.

The proposed Maple River to Cuyuna 345 kV Transmission Line (project) consists of:

- A new, approximately 160-to-180-mile, 345 kV double-circuit transmission line, operated initially as a single-circuit transmission line, connecting Minnesota Power's Cuyuna Substation in Crow Wing County Minnesota to Otter Tail Power Company's Maple River Substation in Cass County, North Dakota.

II. PROCEDURAL BACKGROUND

February 7, 2025	The Applicants filed a Notice of Intent to Construct the proposed project.[2]
August 27, 2025	The Applicants filed a petition requesting approval of its Exemption Plan relating to exemptions to data requirements for a future CN petition for the proposed project.[3]
August 27, 2025	The Applicants filed a Notice Plan petition, providing a plan to notify potentially affected members of the public about the proposed project.[4]

[1] *In the Matter of the Application for a Certificate of Need for the Maple River to Cuyuna 345 kV Transmission Line Project*, Minnesota Power, Great River Energy, Otter Tail Power Company, Initial Filing, January 30, 2026, Docket No. E015, ET2, E017/CN-25-109, (eDockets) 20261-227645-02, (hereinafter "Petition").

[2] *Notice of Intent to Construct, Own, and Maintain the Maple River to Cuyuna 345 kV Transmission Project LRTP Project #20*, Minnesota Power, Great River Energy, Otter Tail Power Company, Notice, February 7, 2025, Docket No. E015, ET2, E017/CN-25-109, (eDockets) 20252-215111-01.

[3] *In the Matter of the Application for a Certificate of Need for the Maple River to Cuyuna 345 kV Transmission Line Project,* Minnesota Power, Great River Energy, Otter Tail Power Company, Exemption Request, August 27, 2025, Docket No. E015, ET2, E017/CN-25-109, (eDockets) 20258-222473-01, (hereinafter "Exemption Request").

[4] *In the Matter of the Application for a Certificate of Need for the Maple River to Cuyuna 345 kV Transmission Line Project,* Minnesota Power, Great River Energy, Otter Tail Power Company, Notice Plan Petition, August 27, 2025, Docket No. E015, ET2, E017/CN-25-109, (eDockets) 20258-222474-01.

October 21, 2025	The Commission ordered the approval of the Applicants' Exemption Petition with modifications and Notice Plan petition.[5]
January 30, 2026	The Applicants filed the petition requesting approval of a CN for the proposed project.[6]
February 9, 2026	The Commission issued a notice of comment period on the completeness of the petition.[7]

Topics open for comment:

- Does the Certificate of Need application contain the information required by Minnesota Rule chapter 7849.0220, Subp. 2?
- Are there any contested issues of fact with respect to the representations made in the application?
- Should the Commission stay the Certificate of Need application, so that it can be reviewed in a joint proceeding with the route permit application?
- Are there other issues or concerns related to this matter?

III. DEPARTMENT ANALYSIS

A. COMPLETENESS REVIEW

The first notice topic asks if the "Certificate of Need application contains the information required by Minnesota Rule chapter 7849.0220, Subp. 2?"

Minnesota Rules 7849.0220, Subp. 2, states that each CN application for large high voltage transmission lines (LHVTL) "shall include all of the information required by parts 7849.0240 and 7849.0260 to 7849.0340." However, Minnesota Rules 7849.0200, Subp. 6, allows for exemptions from any of the content requirements of CN applications if the applicant demonstrates that the requirement is not necessary for determining whether the facility is needed. Applicants filed an exemption request on August 27, 2025.[8] The Commission approved the Applicants' Exemption Petition with modifications.[9]

The Applicants provided the Department with a draft version of the petition to review as a courtesy to the Applicants before the official filing to the Commission on January 30, 2026. In review of the draft petition, the Department found information and data missing. Some of these deficiencies were

[5] *In the Matter of the Application for a Certificate of Need for the Maple River to Cuyuna 345 kV Transmission Line Project,* Order, October 21, Docket No. E015, ET2, E017/CN-25-109, (eDockets) 202510-224125-01, (hereinafter "Exemption and Notice Plan Order").
[6] Petition.
[7] *In the Matter of the Application for a Certificate of Need for the Maple River to Cuyuna 345 kV Transmission Line Project, Notice of Comment* Period, February 9, 2026, Docket No. E015, ET2, E017/CN-25-109, (eDockets) 20262-227936-01.
[8] Exemption Request.
[9] Exemption and Notice Plan Order.

addressed in the official filing. The data and information that was not addressed in the official filing, along with other comments and questions that the Department uncovered in reviewing the official filing, are addressed in Section D "Other Issues." Although the Applicants did not address all questions and comments from the courtesy review, the points the Applicants did address allows the Department to deem the official petition substantially complete.

Attached is a table summarizing the Department's completeness review of the *draft* version of the CN petition shared with the Department before the official filing to the Commission (Attachment 1). The table indicates information required by Minnesota Rules, the location of data and information in the petition, the location of alternative data if the Applicant was granted an exemption to the applicable Minnesota Rule, and whether the petition contains the relevant data and information

The Department concludes that the Applicants' petition is **substantially complete**. This conclusion only addresses completeness, an administrative determination of the information provided.

B. CONTESTED ISSUES OF FACT

The second notice topic asks if there are any "contested issues of fact with respect to the representations made in the application?"

The Department is unaware of any contested issues of fact pertaining to completeness of the petition. The Department believes the Commission's informal process of comments and reply comments will be sufficient to develop and address issues in this proceeding.

C. JOINT PROCEEDING WITH ROUTE PERMIT

The third notice topic asks if the Commission should "stay the Certificate of Need application, so that it can be reviewed in a joint proceeding with the route permit application?"

Minn. Stat. 216B.243 subd. 4 states that "unless the commission determines that a joint hearing on siting and need under this subdivision and chapter 216I is not feasible or more efficient, or otherwise not in the public interest, a joint hearing under this subdivision and Chapter 216I must be held."[10] Minnesota Rules 7849.1900 likewise indicates preference for holding joint hearings for certificate of need proceedings and routing and siting determinations.[11]

The Department finds the Applicants request to suspend the CN application until the route permit application has been filed is reasonable, based on the applicable guidance laid out in Minnesota Statutes and Minnesota Rules for pursuing jointly the certificate of need determinations and route determinations.

[10] Minn. Stat. § 216B.243 subd. 4. (2024).
[11] Minn.R. 7849.1900.

The Department recommends staying the CN proceeding, following any determination from the Commission on completeness, until the Applicants file the route permit for the project.

D. OTHER ISSUES

The fourth notice topic asks if there "are any other issues or concerns related to this matter?"

In reviewing the application for completeness, the Department found items that may be erroneous, unclear, or lacking. Some of the following comments and questions were provided to the applicant during a courtesy pre-application review and are still relevant to the filed application, and some comments and questions are in response to the official filing.

- Minn. R. 7849.0260 item B(5):

    1. The Applicants state that "the Project was studied and approved by MISO as a single circuit 345 kV transmission line, but heavy utilization of the new 345 kV line observed in LRTP study models led MISO to include the following additional requirements in the Project definition." This includes being designed to be capable of delivering a "surge impedance loading (SIL) of 550 MW, which is higher than the SIL rating of a typical 345 kV structure in Minnesota."

        The Applicants should elaborate on why MISO deemed it necessary to increase the SIL impedance on the double circuit capable line yet still approve it to operate as a single circuit. The petition should address the tradeoffs of this approach versus the following:

        a. Single-circuiting the line and following with a double-circuit once approved by MISO and the Commission.

        b. Double-circuiting the line now and operating it as a double-circuit line with the higher impedance.

        The Applicants should provide work papers, communications, or collaborations with MISO on this topic.

    2. The Applicants should provide more in-depth cost estimates of building the double circuit line relative to costs of building a double-circuit capable structure with an initial single-circuit and provide quantitative and qualitative reasoning on the cost savings of both approaches.

- Minn. R. 7849.0260 item C(1):

1. Can the Applicants provide more details of how the project components cost estimates were calculated and what portion is related to risk reserves?

2. Can the Applicants provide more details of project costs and how they are affected with section 232 tariffs for steel, copper and aluminum, in addition to any other potential cost drivers?

3. The original cost estimate approved by MISO for the project was $907.8 million. The cost estimate was then increased to a range of $1,108.4 million to $1,332.8 million. The Applicants should provide further detail as to why the cost increased. The Applicants note the project was further developed after MISO approved it. The Applicants should specify which components were added after MISO already approved the project.

4. At the higher $1,332.8 million cost, does the project still meet the benefit/cost ratio of 1.25?

5. The threshold for triggering a variance analysis at MISO is 25%. The lower end, $1,108.4 million, would still be within 25%, but the higher end, $1,332.8 million would not. Are the Applicants aware that the higher cost would trigger a variance analysis?

- Minn. R. 7849.0260 item C(5):

    1. Will the project be classified as a retail or a wholesale line for ratemaking purposes?

        a. If retail, can the Applicants commit that all related revenues be included with costs in future cost recovery?

        b. If wholesale, can the Applicants ensure all costs (besides keeping related revenues) are tracked and paid for by the wholesale?

IV. DEPARTMENT RECOMMENDATIONS

Based on the Departments analysis of the petition, the information in the record, and the Department's review of the draft petition, the Department has prepared two recommendations which are provided below.

A. COMPLETENESS REVIEW

- The Department finds the application includes information that addresses Minnesota Rule chapter 7849.0220, Subp.2 and recommends declaring the application substantially complete.

C. JOINT PROCEEDING WITH ROUTE PERMIT

- The Department recommends staying the CN proceeding, following any determination from the Commission on completeness, until the Applicants file the route permit for the project.

Attachment 1 – *Draft* Application Completeness Checklist

Attachment 2 – Project Map[12]

[12] Petition at Appendix D.

Misc. comments:
1. Please include the pre-application checklist as an appendix. We are aware that last time we asked for it to be part of the application, but we found it more helpful to have a separate appendix during the review process. Apologies for the confusion.
2. There are several instances where the location in the pre-application checklist does not match the actual location of information. For example, your checklist says conductor information can be found in 2.1, but it is actually found in 2.2.2. Please ensure accurate and matching information. Our goal is to get this back to you as fast as possible.
3. In section 1.8, the Applicants explain they want a joint proceeding for the CN and route permit, but that the route permit will not be submitted until August. Why was the route permit not submitted jointly with the CN?
4. There is some text highlighted in yellow; we assume this means it will be complete for the actual filing.

Minnesota Rule	Short Description	Rule Text	Location in Pre App	Complete?	Comments
7849.0240 (1)	Need Summary	An application must contain a summary of the major factors that justify the need for the proposed facility. This summary must not exceed, without the approval of the commission, 15 pages in length, including text, tables, graphs, and figures.	1.3, 3.2, 3.3, 3.4	Yes	
7849.0240(2)	Additional Considerations	Each application shall contain an explanation of the relationship of the proposed facility to each of the following socioeconomic considerations:			
7849.0240(2)(A)	Socially Beneficial Uses	socially beneficial uses of the output of the facility, including its uses to protect or enhance environmental quality;	3.10	Yes	
7849.0240(2)(B)	Promotional Activities	promotional activities that may have given rise to the demand for the facility;	3.8	Yes	
7849.0240(2)(C)	Future Development	the effects of the facility in inducing future development.	3.9	Yes	
7849.0260	Project Description	Each application for a proposed LHVTL must include:			
7849.0260(A)	Description of Facility	a description of the type and general location of the proposed line, including:			
7849.0260(A)(1)	Design Voltage	the design voltage;	2.1	Yes	
7849.0260(A)(2)	Conductors	the number, the sizes, and the types of conductors;	2.2.2	Yes	
7849.0260(A)(3)	Line Losses	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;	3.6	Yes	
7849.0260(A)(4)	Length	the approximate length of the proposed transmission line and the portion of that length in Minnesota;	1.2, 4.1, 4.8	Yes	
7849.0260(A)(5)	Terminal Location	the approximate location of DC terminals or AC substations, which information shall be on a map of appropriate scale;	Appendix D Map 1	Yes	
7849.0260(A)(6)	Affected Counties	a list of all counties reasonably likely to be affected by construction and operation of the proposed line;	8.4.1	Yes	
7849.0260(B)	Description of Alternatives	a discussion of the availability of alternatives to the facility, including but not limited to:			
7849.0260(B)(1)	New Generation	new generation of various technologies, sizes, and fuel types;	4.2	Yes	
7849.0260(B)(2)	Upgrade Existing Facility	upgrading of existing transmission lines or existing generating facilities;	4.3	Yes	
7849.0260(B)(3)	Different Voltages & Conductors	transmission lines with different design voltages or with different numbers, sizes, and types of conductors;	4.4, 4.7	Yes	
7849.0260(B)(4)	Different Endpoints	transmission lines with different terminals or substations;	N/A	Yes	
7849.0260(B)(5)	Double Circuit Existing Lines	double circuiting of existing transmission lines;	4.6	Partial	Applicants state that "the Project was studied and approved by MISO as a single circuit 345 kV transmission line, but heavy utilization of the new 345 kV line observed in LRTP study models led MISO to include the following additional requirements in the Project definition." This includes being designed to be capable of delivering a "surge impedance loading (SIL) of 550 MW, which is higher than the SIL rating of a typical 345 kV structure in Minnesota." Can Applicants elaborate on why MISO deemed it necessary to increase the surge impedance loading (SIL) on the double circuit capable line, yet still approve it to operate as a single circuit? What is the benefit of this approach, versus single-circuiting the line and following with a double-circuit once MISO approves the double circuit in the future, or of double-circuiting the line now and operating it as a double-circuit line? Can applicants provide any further working papers, communications, or collaboration with MISO on this topic?
7849.0260(B)(6)	DC transmission line	if the proposed facility is for DC (AC) transmission, an AC (DC) transmission line;	4.8	Yes	
7849.0260(B)(7)	Underground LIne	if the proposed facility is for overhead (underground) transmission, an underground (overhead) transmission line;	4.9	Yes	
7849.0260(B)(8)	Reasonable Combinations	any reasonable combinations of the alternatives listed in subitems (1) to (7);	N/A	Yes	
7849.0260(C)	Alternatives Details	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:			
7849.0260(C)(1)	Cost in Current Dollars	its total cost in current dollars;	1.4, 2.4	Partial	Sections 2.2.4 and 2.4: add more details of how the project component cost estimates were calculated and what portion is related to risk reserves.
7849.0260(C)(2)	Service Life	its service life;	5.4.1	Yes	

7849.0260(C)(3)	Average Annual Availability	its estimated average annual availability;	5.4.1	Yes	
7849.0260(C)(4)	O & M Costs	its estimated annual operating and maintenance costs in current dollars;	2.4.2	N/A	
7849.0260(C)(5)	Effect on Rates	an estimate of its effect on rates systemwide and in Minnesota, assuming a test year beginning with the proposed in-service date;	2.4.3	Partial	Part of this rule is addressed in 2.4.3, but the Applicants have incomplete information pertaining to the project's effect on rates for each utility customer in Minnesota (systemwide rate impacts are completed). Why is OTP's estimated retail rate impact trade secret but MP's is not? We like Table 8 (given MP completes it) as it is important to see the effect on different rate classes. Can OTP complete a table like this as well?
7849.0260(C)(6)	Losses	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, or expressed for a generating facility as the estimated heat rate;	3.6	Yes	
7849.0260(C)(7)	Major Assumptions	the major assumptions made in providing the information in subitems (1) to (6);	2, 3, 5	Yes	
7849.0260(D)	System Map	a map (of appropriate scale) showing the applicant's system or load center to be served by the proposed LHVTL	1.1, 3.3.8	Yes	
7849.0260(E)	Other Relevant Information	such other information about the proposed facility and each alternative as may be relevant to determination of need.	4	Yes	
7849.0270(1)	Forecast: Scope	Each application shall contain pertinent data concerning peak demand and annual electrical consumption within the applicant's service area and system, as provided in part 7849.0220, including but not limited to the data requested in subpart 2, item B. When recorded data is not available, or when the applicant does not use the required data in preparing its own forecast, the applicant shall use an estimate and indicate in the forecast justification section in subparts 3 to 6 the procedures used in deriving the estimate. The application shall clearly indicate which data are historical and which are projected. It is expected that data provided by the applicant should be reasonable and internally consistent.	Appendix G	Partial	Applicants sought and received exemption from Minn. Rule 7849.0270 subparts 1-6 (Forecasting), provided the Applicants provided alternative data, which applicants supplemented with Annual Electric Utility Forecast Report (AFR) and any forecast used by the Applicants or MISO in analyzing the need for this proposed Project. Applicants provided AFR forecasts in Appendix G, with additional discussions of project analysis from MISO in Chapter 3. For clarity, Applicants could consider listing specific locations of material in the cover letter for Appendix G by utility, such that the Department's reviewers can quickly identify the relevant forecasting methodologies, and the specific location of alternative data provided for the exemption.
7849.0270(2)	Forecast Content	For each forecast year, the following data must be provided:			
7849.0270(2)(A)	Annual Consumption	when the applicant's service area includes areas other than Minnesota, annual electrical consumption by ultimate consumers within the applicant's Minnesota service area;	Appendix G	Yes	
7849.0270(2)(B)	Number of Customers by Class	for each of the following categories, estimates of the number of ultimate consumers within the applicant's system and annual electrical consumption by those consumers: (1) farm, excluding irrigation and drainage pumping; (2) irrigation and drainage pumping; (3) nonfarm residential; (4) commercial; (5) mining; (6) industrial; (7) street and highway lighting; (8) electrified transportation; (9) other (this category shall include municipal water pumping facilities, oil and gas pipeline pumping facilities, military camps and bases, and all other consumers not reported in subitems (1) to (8)); and (10) the sum of subitems (1) to (9);	Appendix G	Yes	
7849.0270(2)(C)	Peak Demand by Class	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;	Appendix G	Yes	
7849.0270(2)(D)	Monthly Peak Demand	the applicant's system peak demand by month;	Appendix G	Yes	
7849.0270(2)(E)	Revenue Req.	the estimated annual revenue requirement per kilowatt hour for the system in current dollars;	2.4.3	Yes	
7849.0270(2)(F)	Forecast: Content, Load Factor	the applicant's estimated average system weekday load factor by month; in other words, for each month, the estimated average of the individual load factors for each weekday in the month.	N/A	Yes	
7849.0270(3)	Forecast Methodology	An applicant may use a forecast methodology of its own choosing, with due consideration given to cost, staffing requirements, and data availability. However, forecast data provided by the applicant is subject to tests of accuracy, reasonableness, and consistency. The applicant shall detail the forecast methodology employed to obtain the forecasts provided under subpart 2, including:			
7849.0270(3)(A)	Overall Framework	A. the overall methodological framework that is used;	Chapter 3, Appendix G	Yes	

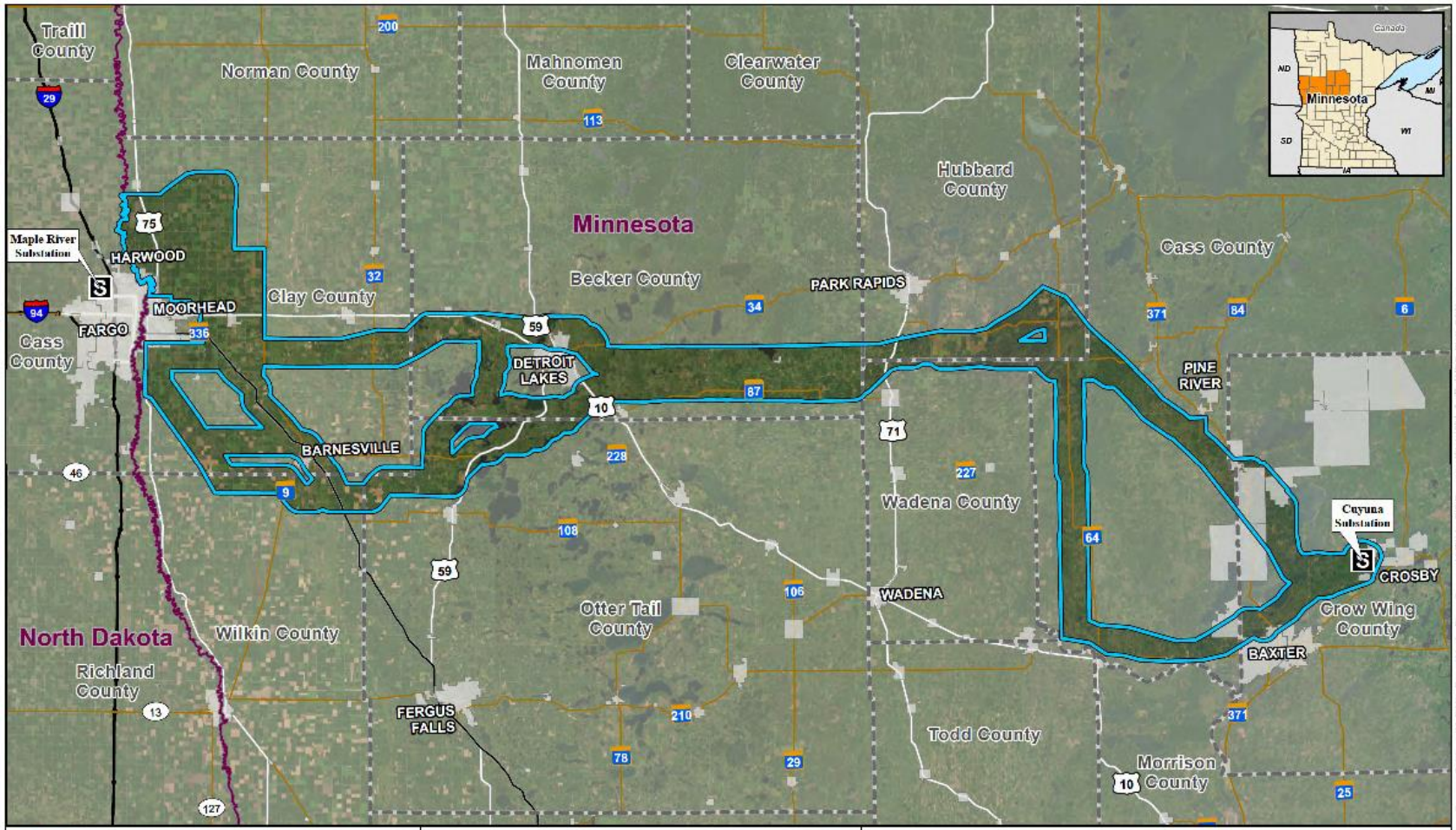
7849.0270(3)(B)	Analytical Techniques	the specific analytical techniques which are used, their purpose, and the components of the forecast to which they have been applied;	Chapter 3, Appendix G	Yes	
7849.0270(3)(C)	Relation of Techniques	the manner in which these specific techniques are related in producing the forecast;	Chapter 3, Appendix G	Yes	
7849.0270(3)(D)	Statistical Tests	where statistical techniques have been used: (1) the purpose of the technique; (2) typical computations (e.g., computer printouts, formulas used), specifying variables and data; and (3) the results of appropriate statistical tests;	Chapter 3, Appendix G	Yes	
7849.0270(3)(E)	Confidence Levels	forecast confidence levels or ranges of accuracy for annual peak demand and annual electrical consumption, as well as a description of their derivation;	Chapter 3, Appendix G	Yes	
7849.0270(3)(F)	Analysis of Methodology	a brief analysis of the methodology used, including: (1) its strengths and weaknesses; (2) its suitability to the system; (3) cost considerations; (4) data requirements; (5) past accuracy; and (6) other factors considered significant by the applicant;	Chapter 3, Appendix G	Yes	
7849.0270(3)(G)	Discrepancies	an explanation of discrepancies that appear between the forecasts presented in the application and the forecasts submitted under chapter 7610 or in the applicant's previous certificate of need proceedings.	Chapter 3, Appendix G	Yes	
7849.0270(4)	Forecast Data Bases: List	The applicant shall discuss the data base used in arriving at the forecast presented in its application, including:			
7849.0270(4)(A)	Forecast Data Bases: List	a complete list of all data sets used in making the forecast, including a brief description of each data set and an explanation of how each was obtained, (e.g., monthly observations, billing data, consumer survey, etc.) or a citation to the source (e.g., population projection from the state demographer's office);	Chapter 3, Appendix G	Yes	
7849.0270(4)(B)	Forecast Data Bases: Adjustments	a clear identification of any adjustments made to raw data in order to adapt them for use in forecasts, including: (1) the nature of the adjustment; (2) the reason for the adjustment; and (3) the magnitude of the adjustment. The applicant shall provide to the commission or the administrative law judge on demand copies of the data sets used in making the forecasts, including both raw and adjusted data, input and output data.	Chapter 3, Appendix G	Yes	
7849.0270(5)	Forecast Assumptions	The applicant shall discuss each essential assumption made in preparing the forecast, including the need for the assumption, the nature of the assumption, and the sensitivity of forecast results to variations in the essential assumptions. The applicant shall discuss the assumptions made regarding:	Chapter 3, Appendix G	Yes	
7849.0270(5)(A)	Energy Sources	the availability of alternate sources of energy;	Chapter 3, Appendix G	Yes	
7849.0270(5)(B)	Fuel Switching	the expected conversion from other fuels to electricity or vice versa;	Chapter 3, Appendix G	Yes	
7849.0270(5)(C)	Energy Prices	future prices of electricity for customers in the applicant's system and the effect that such price changes will likely have on the applicant's system demand;	Chapter 3, Appendix G	Yes	
7849.0270(5)(D)	Data Availability	the data requested in subpart 2 that is not available historically or not generated by the applicant in preparing its own internal forecast;	Chapter 3, Appendix G	Yes	
7849.0270(5)(E)	Conservation	the effect of energy conservation programs on long-term electrical demand	Chapter 3, Appendix G	Yes	
7849.0270(5)(F)	Other Factors	any other factor considered by the applicant in preparing the forecast.	Chapter 3, Appendix G	Yes	
7849.0270(6)	Forecast Coordination	The applicant shall provide:	Chapter 3, Appendix G	Yes	
7849.0270(6)(A)	Forecast Coordination: Extent	a description of the extent to which the applicant coordinates its load forecasts with those of other systems, such as neighboring systems and associate systems in a power pool or coordinating organization;	Chapter 3, Appendix G	Yes	
7849.0270(6)(B)	Forecast Coordination: Manner	a description of the manner in which such forecasts are coordinated, and any problems experienced in efforts to coordinate load forecasts.	Chapter 3, Appendix G	Yes	
7849.0280	System Capacity	The applicant shall describe the ability of its existing system to meet the demand for electrical energy forecast in response to part 7849.0270 and the extent to which the proposed facility will increase this capability. In preparing this description, the applicant shall present the following information:	Chapter 3, Appendix G	Yes	

7849.0280(A)	Power Planning Programs	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;	Appendix G	Yes	
7849.0280(B)	Firm Transactions	the applicant's seasonal firm purchases and seasonal firm sales for each utility involved in each transaction for each of the forecast years;	N/A	Yes	
7849.0280(C)	Participation Transactions	the applicant's seasonal participation purchases and seasonal participation sales for each utility involved in each transaction for each of the forecast years;	N/A	Yes	
7849.0280(D)	Load and Capability Table, Existing System	for the summer season and for the winter season corresponding to each forecast year, the load and generation capacity data requested in subitems (1) to (13), including the anticipated purchases, sales, capacity retirements, and capacity additions, except those that depend on certificates of need not yet issued by the commission: (1) seasonal system demand; (2) annual system demand; (3) total seasonal firm purchases; (4) total seasonal firm sales; (5) seasonal adjusted net demand (subitem (1) minus subitem (3) plus subitem (4)); (6) annual adjusted net demand (subitem (2) minus subitem (3) plus subitem (4)); (7) net generating capacity; (8) total participation purchases; (9) total participation sales; (10) adjusted net capability (subitem (7) plus subitem (8) minus subitem (9)); (11) net reserve capacity obligation; (12) total firm capacity obligation (subitem (5) plus subitem (11)); and (13) surplus or deficit (-) capacity (subitem (10) minus subitem (12));	N/A	Yes	
7849.0280(E)	Load and Capability Table, With Proposed Facility	for the summer season and for the winter season corresponding to each forecast year subsequent to the year of application, the load and generation capacity data requested in item D, subitems (1) to (13), including purchases, sales, and generating capability contingent on the proposed facility;	N/A	Yes	
7849.0280(F)	Load and Capability Table, With All Future Generation	for the summer season and for the winter season corresponding to each forecast year subsequent to the year of application, the load and generation capacity data requested in item D, subitems (1) to (13), including all projected purchases, sales, and generating capability;	N/A	Yes	
7849.0280(G)	Proposed Additions and Retirments	for each of the forecast years subsequent to the year of application, a list of proposed additions and retirements in net generating capability, including the probable date of application for any addition that is expected to require a certificate of need;	N/A	Yes	
7849.0280(H)	Monthly Data	for the previous calendar year, the current year, the first full calendar year before the proposed facility is expected to be in operation and the first full calendar year of operation of the proposed facility, a graph of monthly adjusted net demand and monthly adjusted net capability, as well as a plot on the same graph of the difference between the adjusted net capability and actual, planned, or estimated maintenance outages of generation and transmission facilities; and	N/A	Yes	
7849.0280(I)	Reserve Margin Discussion	a discussion of the appropriateness of and the method of determining system reserve margins, considering the probability of forced outages of generating units, deviation from load forecasts, scheduled maintenance outages of generation and transmission facilities, power exchange arrangements as they affect reserve requirements, and transfer capabilities.	N/A	Yes	
7849.0290	Conservation Programs	An application must include:			
7849.0290(A)	Conservation Programs	the name of the committee, department, or individual responsible for the applicant's energy conservation and efficiency programs, including load management;	Appendix H	Yes	
7849.0290(B)	Conservation Programs: Goals	a list of the applicant's energy conservation and efficiency goals and objectives;	Appendix H	Yes	
7849.0290(C)	Conservation Programs: List	a description of the specific energy conservation and efficiency programs the applicant has considered, a list of those that have been implemented, and the reasons why the other programs have not been implemented;	Appendix H	Yes	
7849.0290(D)	Conservation Programs: Accomplisments	a description of the major accomplishments that have been made by the applicant with respect to energy conservation and efficiency;	Appendix H	Yes	

7849.0290(E)	Conservation Programs: Plans	a description of the applicant's future plans through the forecast years with respect to energy conservation and efficiency;	Appendix H	Yes	
7849.0290(F)	Conservation Programs: Quantification	a quantification of the manner by which these programs affect or help determine the forecast provided in response to part 7849.0270, subpart 2, a list of their total costs by program, and a discussion of their expected effects in reducing the need for new generation and transmission facilities.	Appendix H	Yes	
7849.0300	Consequences of Delay	The applicant shall present a discussion of anticipated consequences to its system, neighboring systems, and the power pool should the proposed facility be delayed one, two, and three years, or postponed indefinitely. This information must be provided for the following three levels of demand: the expected demand provided in response to part 7849.0270, subpart 2, and the upper and lower confidence levels provided in response to part 7849.0270, subpart 3, item E.	4.10	Yes	
7849.0310	Environmental Info Reqired	Each applicant shall provide environmental data for the proposed facility and for each alternative considered in detail in response to part 7849.0250, item C or 7849.0260, item C. Information relating to construction and operation of each of these alternatives shall be provided as indicated in parts 7849.0320 to 7849.0340, to the extent that such information is reasonably available to the applicant and applicable to the particular alternative. Where appropriate, the applicant shall submit data for a range of possible facility designs. Major assumptions should be stated, and references should be cited where appropriate.	6	Yes	
7849.0320	Generator Alterative Info	The applicant shall provide the following information for each alternative that would involve construction of an LEGF:	N/A	N/A	
7849.0320(A)	Land Required	the estimated range of land requirements for the facility with a discussion of assumptions on land requirements for water storage, cooling systems, and solid waste storage;	N/A	N/A	
7849.0320(B)	Traffic	the estimated amount of vehicular, rail, and barge traffic generated by construction and operation of the facility;	N/A	N/A	
7849.0320(C)	Fossil Fuel Information	for fossil-fueled facilities:	N/A	N/A	
7849.0320(C)(1)	Fuel Sources	the expected regional sources of fuel for the facility;	N/A	N/A	
7849.0320(C)(2)	Fuel Requirement	the typical fuel requirement (in tons per hour, gallons per hour, or thousands of cubic feet per hour) during operation at rated capacity and the expected annual fuel requirement at the expected capacity factor;	N/A	N/A	
7849.0320(C)(3)	Heat Rate	the expected rate of heat input for the facility in Btu per hour during operation at rated capacity;	N/A	N/A	
7849.0320(C)(4)	Heat Value	the typical range of the heat value of the fuel (in Btu per pound, Btu per gallon, or Btu per 1,000 cubic feet) and the typical average heat value of the fuel;	N/A	N/A	
7849.0320(C)(5)	Fuel Content	the typical ranges of sulfur, ash, and moisture content of the fuel;	N/A	N/A	
7849.0320(D)	Fossil Fuel Information	for fossil fueled facilities:	N/A	N/A	
7849.0320(D)(1)	Trace Elements	the estimated range of trace element emissions and the maximum emissions of sulfur dioxide, nitrogen oxides, and particulates in pounds per hour during operation at rated capacity; and	N/A	N/A	
7849.0320(D)(2)	Emission Concentrations	the estimated range of maximum contributions to 24-hour average ground level concentrations at specified distances from the stack of sulfur dioxide, nitrogen oxides, and particulates in micrograms per cubic meter during operation at rated capacity and assuming generalized worst-case meteorological conditions;	N/A	N/A	
7849.0320(E)	Water Use	water use by the facility for alternate cooling systems, including: (1) the estimated maximum use, including the groundwater pumping rate in gallons per minute and surface water appropriation in cubic feet per second; (2) the estimated groundwater appropriation in million gallons per year; and (3) the annual consumption in acre-feet;	N/A	N/A	
7849.0320(E)	Water Use	water use by the facility for alternate cooling systems, including:	N/A	N/A	
7849.0320(E)(1)	Water Use	the estimated maximum use, including the groundwater pumping rate in gallons per minute and surface water appropriation in cubic feet per second;	N/A	N/A	
7849.0320(E)(2)	Water Use	(2) the estimated groundwater appropriation in million gallons per year;	N/A	N/A	
7849.0320(E)(3)	Water Use	the annual consumption in acre-feet;	N/A	N/A	

7849.0320(F)	Discharges	the potential sources and types of discharges to water attributable to operation of the facility;	N/A	N/A	
7849.0320(G)	Radioactive Releases	radioactive releases, including:	N/A	N/A	
7849.0320(G)(1)	Nuclear Facilities	for nuclear facilities, the typical types and amounts of radionuclides released by the facility in curies per year for alternate facility designs and levels of waste treatment;	N/A	N/A	
7849.0320(G)(2)	Fossil Fuel Facilities	for fossil-fueled facilities, the estimated range of radioactivity released by the facility in curies per year;	N/A	N/A	
7849.0320(H)	Solid Wastes	the potential types and quantities of solid wastes produced by the facility in tons per year at the expected capacity factor;	N/A	N/A	
7849.0320(I)	Noise	the potential sources and types of audible noise attributable to operation of the facility;	N/A	N/A	
7849.0320(J)	Work Force	the estimated work force required for construction and operation of the facility;	N/A	N/A	
7849.0320(K)	Transmission	the minimum number and size of transmission facilities required to provide a reliable outlet for the generating facility.	N/A	N/A	
7849.0330	Transmission Facilities	The applicant shall provide data for each alternative that would involve construction of an LHVTL. The following information must be included:			
7849.0330(A)	Overhead Transmission	for overhead transmission facilities:			
7849.0330(A)(1)	Overhead Transmission: Structure/Conductor Diagram	schematic diagrams that show the dimensions of the support structures and conductor configurations for each type of support structure that may be used;	2.2.2, Appendix E	Yes	
7849.0330(A)(2)	Overhead Transmission: Electric Fields	a discussion of the strength and distribution of the electric field attributable to the transmission facility, including the contribution of air ions if appropriate;	5.5.1, Appendix I	Yes	
7849.0330(A)(3)	Overhead Transmission: Ozone and Nitrogen Oxide	a discussion of ozone and nitrogen oxide emissions attributable to the transmission facility;	5.7	Yes	
7849.0330(A)(4)	Overhead Transmission: Radio and TV Interference	a discussion of radio and television interference attributable to the transmission facility;	5.8	Yes	
7849.0330(A)(5)	Overhead Transmission: Audible Noise	a discussion of the characteristics and estimated maximum and typical levels of audible noise attributable to the transmission facilities;	5.9, 6.5.3	Yes	
7849.0330(B)	Underground Transmission	for underground transmission facilities:			
7849.0330(B)(1)	Cable Types	the types and dimensions of the cable systems and associated facilities that would be used;	N/A	N/A	
7849.0330(B)(2)	Cable Materials	the types and quantities of materials required for the cable system, including materials required for insulation and cooling of the cable;	N/A	N/A	
7849.0330(B)(3)	Cable Heat	the amount of heat released by the cable system in kilowatts per foot of cable length;	N/A	N/A	
7849.0330(C)	Right-of-Way	the estimated width of the right-of-way required for the transmission facility;	5.1	Yes	
7849.0330(D)	Construction Practices	a description of construction practices for the transmission facility;	5.2	Yes	
7849.0330(E)	O & M Practices	a description of operation and maintenance practices for the transmission facility;	5.4	Yes	
7849.0330(F)	Work Force	the estimated work force required for construction and for operation and maintenance of the transmission facility;	5.2.3, 5.4.3	Yes	
7849.0330(G)	Description of Region	a narrative description of the major features of the region between the endpoints of the transmission facility. The region shall encompass the likely area for routes between the endpoints. The description should emphasize the area within three miles of the endpoints. The following information shall be described where applicable:			
7849.0330(G)(1)	Hydrologic Features	hydrologic features including lakes, rivers, streams, and wetlands;	6.2, 6.8	Yes	
7849.0330(G)(2)	Vegetation & Wildlife	natural vegetation and associated wildlife;	6.2, 6.9	Yes	
7849.0330(G)(3)	Physiographic Regions	physiographic regions;	6.2, 6.3	Yes	
7849.0330(G)(4)	Land Use	land-use types, including human settlement, recreation, agricultural production, forestry production, and mineral extraction.	6.2, 6.4	Yes	
7849.0340	No-facility Alternative	For each of the three levels of demand specified in part 7849.0300, the applicant shall provide the following information for the alternative of no facility:			
7849.0340(A)	Existing System Impact	a description of the expected operation of existing and committed generating and transmission facilities;	4.10	Yes	

7849.0340(B)	Resource Requirements & Emissions	a description of the changes in resource requirements and wastes produced by facilities discussed in response to item A, including: (1) the amount of land required; (2) induced traffic; (3) fuel requirements; (4) airborne emissions; (5) water appropriation and consumption; (6) discharges to water; (7) reject heat; (8) radioactive releases; (9) solid waste production; (10) audible noise; and (11) labor requirements;	4.10	Yes	
7849.0340(C)	Reducing Impacts	a description of equipment and measures that may be used to reduce the environmental impact of the alternative of no facility.	4.10	Yes	


Traill County
Norman County
Mahnomen County
Clearwater County
Hubbard County
Minnesota
Becker County
Clay County
Cass County
Wilkin County
Otter Tail County
Wadena County
Todd County
Morrison County
Crow Wing County
Richland County
North Dakota
Maple River Substation
HARWOOD
MOORHEAD
FARGO
DETROIT LAKES
PARK RAPIDS
PINE RIVER
BARNESVILLE
WADENA
CROSBY
BAXTER
FERGUS FALLS
Cuyuna Substation
Map 1
Maple River - Cuyuna 345 kV Transmission Project
Project Study Area/Project Overview
page 1 of 9
Project Substation
Project Study Area
City Boundary
County Boundary
State Boundary
For Environmental Review Purposes Only
Miles

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of people by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Comments

Docket No. E015, ET2, E017/CN-25-109

Dated this **24th** day of **February 2026**

/s/Sharon Ferguson

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38	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	CN-25-109
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43	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	CN-25-109
44	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	CN-25-109
45	Brian	Meloy	bmeloy@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	CN-25-109
46	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN, 55101-2131 United States	Electronic Service		No	CN-25-109
47	Hannah	Mitchell	hmitchell@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	CN-25-109
48	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	CN-25-109
49	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	CN-25-109
50	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	CN-25-109
51	Matthew	Olsen	molsen@otpco.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	CN-25-109
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54	Priti	Patel	ppatel@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369-4718 United States	Electronic Service		No	CN-25-109
55	Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	CN-25-109
56	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		No	CN-25-109
57	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	CN-25-109
58	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	CN-25-109
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70	Stuart	Tommerdahl	stommerdahl@otpco.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States	Electronic Service		No	CN-25-109
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5	Annie	Felix Gerth	annie.felix-gerth@state.mn.us			Board of Water & Soil Resources 520 Lafayette Rd Saint Paul MN, 55155 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
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7	Dean	Hunter	dean.hunter@state.mn.us		Minnesota Department of Labor & Industry	443 Lafayette Rd N St. Paul MN, 55155-4341 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
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9	Chad	Konickson	chad.konickson@usace.army.mil	U.S.Army Corps of Engineers		332 Minnesota St. Suite E1500 Saint Paul MN, 55101 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
10	Stacy	Kotch Egstad	stacy.kotch@state.mn.us		MINNESOTA DEPARTMENT OF TRANSPORTATION	395 John Ireland Blvd. St. Paul MN, 55155 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
11	Dawn S	Marsh	dawn_marsh@fws.gov	U.S. Fish & Wildlife Service		Minnesota-Wisconsin Field Offices 4101 American Blvd E Bloomington MN, 55425 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
12	Stephan	Roos	stephan.roos@state.mn.us		Minnesota Department of Agriculture	625 Robert St N Saint Paul MN, 55155-2538 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
13	Jayme	Trusty	execdir@swrdc.org	SWRDC		2401 Broadway Ave #1 Slayton MN, 56172 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
14	Jen	Tyler	tyler.jennifer@epa.gov	US Environmental Protection Agency		Environmental Planning & Evaluation Unit 77 W Jackson Blvd. Mailstop B-19J Chicago IL, 60604-3590 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
15	Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources		500 Lafayette Road Box 25 St. Paul MN, 55155-4040 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
16	Alan	Whipple	sa.property@state.mn.us		Minnesota Department Of Revenue	Property Tax Division 600 N. Robert Street St. Paul MN, 55146-3340 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
17	Jonathan	Wolfgram	jonathan.wolfgram@state.mn.us		Office of Pipeline Safety	445 Minnesota St Ste 147 Woodbury MN, 55125 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS