

March 9, 2026

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

RE: Supplemental Comments of the Minnesota Department of Commerce  
Docket No. E002, ET2, ET6675/CN-25-117

Dear Ms. Bergman,

Attached are the supplemental 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 PowerOn Midwest 765 kV and 345 kV High Voltage Transmission Line Project.*

The petition was filed by Great River Energy, ITC Midwest, and Xcel on February 3, 2026.<sup>1</sup> These supplemental comments are in response to reply comments filed by the Applicants on March 2, 2026.<sup>2</sup>

The Department continues to recommend **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/ar  
Attachment

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<sup>1</sup> *In the Matter of the Application for a Certificate of Need for the PowerOn Midwest 765 kV and 345 kV High Voltage Transmission Line Project*, GRE, ITC Midwest, and Xcel, Initial Filing, February 9, 2026, Docket No. E002, ET2, ET6675/CN-25-117, (eDockets) [20262-227787-02](#), (hereinafter “Petition”).

<sup>2</sup> *In the Matter of the Application for a Certificate of Need for the PowerOn Midwest 765 kV and 345 kV High Voltage Transmission Line Project*, GRE, ITC Midwest, and Xcel, Reply Comments on Completeness, March 2, 2026, Docket No. E002, ET2, ET6675/CN-25-117, (eDockets) [20263-228830-01](#), (hereinafter “Applicant’s Reply Comments”).



## Before the Minnesota Public Utilities Commission

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### Supplemental Comments of the Minnesota Department of Commerce

Docket No. E002, ET2, ET6675/CN-25-117

#### I. INTRODUCTION

Northern States Power Company, doing business as Xcel Energy (Xcel), Great River Energy (GRE), and ITC Midwest LLC, (collectively, the Applicants) submitted to the Minnesota Public Utilities Commission (Commission) the Applicants' *Certificate of Need* (CN or petition) for the proposed PowerOn Midwest 765 kilovolt (kV) and 345 kV Transmission Project.<sup>3</sup> PowerOn Midwest is the first 765 kV transmission line proposed in Minnesota and would provide transmission infrastructure from the South Dakota/Minnesota border to North Rochester. The proposed 345 kV portion of the project has an in-service date of 2032, and the proposed 765 kV portion has an in-service date of 2034.

The proposed PowerOn Midwest transmission line (project) consists of:

- A new 92-mile-long 765 kV transmission line from the South Dakota/Minnesota state border to the Lakefield Junction Substation in Jackson County, Minnesota.
- A new 18-mile-long 765 kV transmission line from the Iowa/Minnesota state border to the Lakefield Junction Substation in Jackson County, Minnesota.
- A new 130-mile-long 765 kV transmission line from the Lakefield Junction Substation in Jackson County, Minnesota to the Pleasant Valley Substation in Mower County, Minnesota.
- A new 31-mile-long 765 kV transmission line from the Pleasant Valley Substation in Mower County, Minnesota to the North Rochester Substation in Goodhue County, Minnesota.
- A new 31-mile-long 345 kV circuit from the Pleasant Valley Substation in Mower County, Minnesota to the North Rochester Substation in Goodhue County, Minnesota that replaces existing single-circuit structures with new double-circuit capable structures.
- A new 38-mile-long 345 kV circuit from the North Rochester Substation in Goodhue County, Minnesota to the Hampton Substation in Dakota County, Minnesota that uses the existing double-circuit capable structures.
- Expansions and upgrades at Lakefield Junction, Pleasant Valley, North Rochester, and Hampton Substations.

The project was studied, reviewed, and approved as part of the Midcontinent Independent System Operator, Inc.'s (MISO) Tranche 2.1 Portfolio to serve as a backbone to the grid to increase system reliability. Even though the project was approved at the regional level, reviewing the Applicants' petition through the CN process gives the Commission the opportunity to weigh in on behalf of Minnesota's ratepayers. It is essential that the Commission and other state agencies have the authority to advocate for Minnesota's ratepayers.

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<sup>3</sup> Petition.

As demand for electricity increases and the type and amount of generating resources interconnecting to the grid grows, customer demand must continue to be served reliably. The Applicants believe the project is necessary to maintain system reliability to meet future energy needs, meet growing electricity demand cost-effectively, and support the transition to a carbon-free Minnesota.

## II. PROCEDURAL BACKGROUND

February 7, 2025	The Applicants filed a Notice of Intent to Construct the proposed project. <sup>4</sup>
October 1, 2025	The Applicants filed a petition requesting approval of exemptions to data requirements for a future CN petition for the proposed project. <sup>5</sup>
October 1, 2025	The Applicants filed a Notice Plan petition, providing a plan to notify potentially affected members of the public about the proposed project. <sup>6</sup>
November 26, 2025	The Commission ordered the approval of the Applicants' Exemption Request with modifications and Notice Plan Petition. <sup>7</sup>
February 3, 2026	The Applicants filed the petition requesting approval of a CN for the proposed project. <sup>8</sup>
February 9, 2026	The Commission issued a notice of comment period on the completeness of the petition. <sup>9</sup>
February 23, 2026	The Department filed comments on completeness. <sup>10</sup>
March 2, 2026	The Applicants filed reply comments on completeness. <sup>11</sup>

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<sup>4</sup> *Notice of Intent to Construct, Own, and Maintain the Brookings County – Lakefield Junction 765 kV Transmission Line Project*, Xcel and ITC Midwest, Initial Filing, February 7, 2025, Docket No. E002, ET2, ET6675/CN-25-117, (eDockets) [20252-215101-01](#).

<sup>5</sup> *In the Matter of the Application for a Certificate of Need for the PowerOn Midwest 765 kV and 345 kV High Voltage Transmission Line Project*, GRE, ITC Midwest, and Xcel, Exemption Request, October 1, 2025, Docket No. E002, ET2, ET6675/CN-25-117, (eDockets) [202510-223482-03](#).

<sup>6</sup> *In the Matter of the Application for a Certificate of Need for the PowerOn Midwest 765 kV and 345 kV High Voltage Transmission Line Project*, GRE, ITC Midwest, and Xcel, Notice Plan Petition, October 1, 2025, Docket No. E002, ET2, ET6675/CN-25-117, (eDockets) [202510-223482-02](#).

<sup>7</sup> *In the Matter of the Application for a Certificate of Need for the PowerOn Midwest 765 kV and 345 kV High Voltage Transmission Line Project, Order*, November 26, 2025, Docket No. E002, ET2, ET6675/CN-25-117, (eDockets) [202511-225329-01](#).

<sup>8</sup> Petition.

<sup>9</sup> *In the Matter of the Application for a Certificate of Need for the PowerOn Midwest 765 kV and 345 kV High Voltage Transmission Line Project, Notice of Comment Period*, February 9, 2026, Docket No. E002, ET2, ET6675/CN-25-117, (eDockets) [20262-227934-01](#).

<sup>10</sup> *In the Matter of the Application for a Certificate of Need for the PowerOn Midwest 765 kV and 345 kV High Voltage Transmission Line Project*, DOC DER, February 23, 2026, Docket No. E002, ET2, ET6675/CN-25-117, (eDockets) [20262-228520-01](#) (hereinafter "DOC DER Initial Comments").

<sup>11</sup> Applicant's Reply Comments.

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 application be evaluated using the Commission’s informal process or referred to the Court of Administrative Hearings for contested case proceedings?
- Are there other issues or concerns related to this matter?

The Department provides supplemental comments below in response to the Applicants’ reply comments on completeness.

### **III. DEPARTMENT ANALYSIS**

*A. The Applicants write: “It is unclear to the Applicants when DOC-DER is requesting that the Applicants respond to the questions posed in DOC-DER’s comments.”<sup>12</sup>*

This statement by the Applicants is in response to the questions and comments in the “Other Issues” section listed in the Department’s initial comments filed on February 23, 2026.<sup>13</sup> In reviewing the Applicants’ petition to determine completeness, the Department found items that may be erroneous, unclear or lacking, but that are not required to be remedied to determine application completeness. Thus, the Department is not requesting the Applicants provide the information at this time.

Including comments and questions in the “other issues” section of the Department’s initial comments builds the public record and allows the Department to highlight specific issues and concerns to the Applicants at the earliest possible time. As noted by the Applicants, the Department recommended declaring the application substantially complete in initial comments.

### **IV. DEPARTMENT RECOMMENDATIONS**

Based on the Departments analysis of the application and the information in the record, the Department has prepared one recommendation which is provided below.

#### *A. COMPLETENESS REVIEW*

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<sup>12</sup> Applicant’s Reply Comments at 5.

<sup>13</sup> DOC DER Initial Comments at 4-7.

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