

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. ET3, E002/CN-25-121

Dear Ms. Bergman,

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

In the Matter of the Joint Application for a Certificate of Need for the Gopher to Badger Link Project.

The petition was filed by Xcel Energy and Dairyland Power Cooperative on January 30, 2026.¹ These supplemental comments are in response to reply comments filed by the Applicants on March 4, 2026.²

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

RP/DZ/ar
Attachment

¹ *In the Matter of the Application for a Certificate of Need for the Gopher to Badger Link 765 kV High Voltage Transmission Line Project*, Xcel Energy and Dairyland Power Cooperative, Gopher to Badger Link Certificate of Need Application, February 6, 2026, Docket No. ET3, E002/CN-25-121, (eDockets) [20262-227902-02](#), (hereinafter “Petition”).

² *In the Matter of the Application for a Certificate of Need for the Gopher to Badger Link 765 kV High Voltage Transmission Line Project*, Xcel Energy and Dairyland Power Cooperative, Gopher to Badger Filing Letter with Completeness Reply Comments, March 5, 2026, Docket No. ET3, E002/CN-25-121, (eDockets) [20263-228942-01](#), (hereinafter “Applicants' Reply Comments on Completeness”).



Before the Minnesota Public Utilities Commission

Supplemental Comments of the Minnesota Department of Commerce

Docket No. ET3, E002/CN-25-121

I. INTRODUCTION

Northern States Power, doing business as Xcel Energy (Xcel), and Dairyland Power Cooperative (Dairyland) (collectively, Applicants) filed a joint application to the Minnesota Public Utilities Commission (Commission) for approval of Applicants' *Certificate of Need Application* (CN or petition) for the Gopher to Badger Link 765 kilovolt (kV) Transmission Project. The proposed project has an in-service date of 2034.

The proposed Gopher to Badger Link 765 kV transmission line (project) is comprised of two segments:

- Segment 1 is approximately 34 miles of single-circuit 765 kV high voltage transmission line (HVTL) between the existing North Rochester Substation and a point near Marion, Minnesota.
- Segment 2 is approximately 105 miles of single-circuit 765 kV /double-circuit 161 kV HVTL from near Marion, Minnesota to the Wisconsin border. Segment 2 also features a new three-circuit breaker 161 kV switching station at a location to be identified in Houston County, Minnesota, as well as minor upgrades at existing 161 kV substations to support operations of the new project facilities.

The project was studied, reviewed, and approved as part of Midcontinent Independent System Operator's (MISO) Tranche 2.1 Portfolio to serve as a backbone to the grid to increase system reliability.

MISO and the Applicants have identified the need for up to 10,000 additional megawatts of electrical transmission capacity in Minnesota.³ The transmission capacity is needed to address reliability overloads and support compliance with national electric reliability standards, meet current and future state and regional reliability, provide transmission capacity for long-term load growth, and support the energy transition.

Even though the project was first proposed 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.

³ Petition at 2.

II. PROCEDURAL BACKGROUND

February 10, 2025	The Applicants filed a Notice of Intent to Construct, Own, and Maintain the proposed project. ⁴
October 8, 2025	The Applicants filed their Exemption petition ⁵ from certain content requirements for a CN application, pursuant to Minnesota Rules 7849.0200, subp. 6. ⁶
October 8, 2025	The Applicants filed a Notice Plan petition, providing a plan to notify potentially affected members of the public about the proposed project. ⁷
December 23, 2025	The Commission ordered the approval of the Applicants' exemption petition with modifications and notice plan petition. ⁸
January 30, 2026	The Applicants filed the petition requesting approval of a CN for the proposed project. ⁹
February 9, 2026	The Commission issued a notice of comment period on the completeness of the petition. ¹⁰
February 25, 2026	The Department filed initial comments in the comment period on completeness. ¹¹
March 5, 2026	Applicants filed reply comments to the Department and other stakeholders on  completeness. ¹²

⁴ *Notice of Intent to Construct, Own, and Maintain the Minnesota Portion of the North Rochester – Columbia Transmission Line*, Northern States Power Company and Dairyland Power Cooperative, Notice petition, February 10, 2025, Docket No. ET3, E002/CN-25-121, (eDockets) [20252-215156-01](#).

⁵ *In the Matter of the Application for a Certificate of Need for the North Rochester – Columbia 765kV High Voltage Transmission Project*, Dairyland Power Cooperative and Xcel Energy, Exemption Requests, October 8, 2025, Docket No. ET3, E002/CN-25-121, (eDockets) [202510-223688-03](#).

⁶ [Minn. R. 7849.0200, subp. 6](#).

⁷ *In the Matter of the Application for a Certificate of Need for the North Rochester – Columbia 765kV High Voltage Transmission Project (LRTP 26)*, Dairyland Power Cooperative and Xcel Energy, Notice Plan Petition, October 8 2025, Docket No. ET3, E002/CN-25-121, (eDockets) [202510-223688-02](#).

⁸ *In the Matter of the Application for a Certificate of Need for the North Rochester – Columbia 765kV High Voltage Transmission Project, Order Approving Notice Plan and Exemption*, December 23, 2025, Docket No. ET3, E002/CN-25-121 (eDockets) [202512-226131-01](#).

⁹ Petition.

¹⁰ *In the Matter of the Application for a Certificate of Need for the Gopher to Badger Link 765 kV High Voltage Transmission Line Project, Notice of Comment Period*, February 11, 2026, Docket No. ET3, E002/CN-25-121, (eDockets) [20262-228041-01](#).

¹¹ *In the Matter of the Application for a Certificate of Need for the Gopher to Badger Link 765 kV High Voltage Transmission Line Project*, DOC DER, Initial Comments, February 25, 2025, Docket No. ET3, E002/CN-25-121, (eDockets) [20262-228651-01](#), (hereinafter “DOC DER Initial Comments”).

¹² Applicants' Reply Comments on Completeness.

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?

III. DEPARTMENT ANALYSIS

A. APPLICANTS' REPLY COMMENTS ON COMPLETENESS

In Applicants' reply comments on application completeness, the Applicants respond directly to the questions posed by the Department in its February 25, 2026 initial comments on completeness.¹³ The Department provides the following discussion and clarification of its initial comments.

In the “Other Issues” section, the Department asked Applicants to provide additional information about cost drivers, effect of tariffs, and other questions.¹⁴

Applicants responded to some of the Department’s inquiries relating to:

- Completeness Checklist;
- List of affected counties; and
- Clarification on the derivations in Appendix D.¹⁵

The Department appreciates the additional information Applicants provided in their reply comments, as it helps build the record and reduce confusion throughout the application process. The Department confirms the information provided above by Applicants addresses in part the Department’s questions in its initial comments.

The Department also posed questions in initial comments relating to the following:

- Conductor types proposed and study of advanced reconductoring;
- Cost estimates and risk reserves;
- Project cost estimates and effect of tariffs;
- MISO variance process;
- Workforce requirements; and

¹³ DOC DER Initial Comments.

¹⁴ DOC DER Initial Comments at 3-7.

¹⁵ *Ibid.*

- Advanced transmission technologies (ATTs) and grid-enhancing technologies (GETs) and how the Applicants plan to implement both as part of this proposed project.¹⁶

For these other questions posed by the Department, the Applicants stated in reply comments that “it is unclear to the Applicants when DOC-DER is requesting that the Applicants respond to the questions posed in DOC-DER’s comments.”¹⁷ This information is not required under Minn. R. 7849.0220, Subp. 2 for completeness determination.¹⁸ Therefore, the Department is not requesting this additional information at this time and reaffirms its initial recommendation to declare the petition substantially complete.

B. APPLICANTS' REQUEST FOR JOINT CERTIFICATE OF NEED AND ROUTE PERMIT

In Applicants' reply comments on completeness, the Applicants requested that the CN proceeding be stayed until the Applicants submit the Route Permit.¹⁹ The Applicants plan to file the route permit application in Fall 2026. Applicants state that the route permit portion of the application will go through the Major Review process, which includes a full Environmental Impact Statement (EIS).²⁰

For issuing a decision on whether to combine certificates of need and route permit proceedings, Minnesota Statutes indicate a preference for pursuing a joint proceeding for certificate of need proceedings and their associated route permits:

“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.”²¹

The Department has not identified any factors which would make pursuing a joint hearing on siting and need infeasible or less efficient. Pursuant to Minnesota Rules 7849.1900, subp. 4, the Department finds the Applicants' request to stay the CN application until the route permit application is filed is feasible, more efficient, and may further the public interest.²²

Therefore, the Department supports the Applicants' request for the Commission to hold a joint proceeding for the certificate of need and route permit applications and to stay the certificate of need application until Applicants file the associated route permit.

¹⁶ *Ibid.*

¹⁷ Applicants' Reply Comments on Completeness at 5.

¹⁸ [Minn. R. 7849.0220, subp. 2.](#)

¹⁹ *Id.*, at 3.

²⁰ *Id.*, at 4.

²¹ [Minn. Stat. § 216B.243, subd. 4](#) (2023).

²² [Minn. R. 7849.1900, subp 4.](#)

C. **PROCEEDING TYPE DETERMINATION**

The Applicants request the Commission postpone any decision on proceeding type, and whether to refer the proceeding to a contested case, until the route permit is filed.²³ This request hinges on whether the Commission chooses to hold a joint certificate of need and the route permit proceeding. Should the Commission decide to combine the two proceedings, the Department concurs with Applicants that postponing the decision on proceeding type until the route permit is filed would likely reduce public confusion.

If a joint proceeding is held, the Department recommends the Commission postpone its decision on proceeding type, until the route permit application is filed.

IV. DEPARTMENT RECOMMENDATIONS

Based on the Department's analysis of the initial petition, the information in the record, and the Department's review of the Applicants' reply comments, the Department has prepared three recommendations which are provided below.

A. **COMPLETENESS REVIEW**

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

B. **STAYING THE CERTIFICATE OF NEED PROCEEDING**

- The Department supports the Applicants' request for the Commission to hold a joint proceeding for the certificate of need and route permit applications and to stay the certificate of need application until Applicants file the associated route permit.

C. **PROCEEDING TYPE DETERMINATION**

- If the Commission holds a joint proceeding for certificate of need and route permits, The Department recommends the Commission postpone its decision on proceeding type until the route permit is filed.

²³ Applicants' Reply Comments on Completeness at 11.

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
Supplemental Comments**

Docket No. ET3, E002/CN-25-121

Dated this **9th** day of **March 2026**

/s/Sharon Ferguson

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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