



March 9, 2026

Sasha Bergman, *Executive Secretary*
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: 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
DOCKET No. E002, ET2, ET6675/CN-25-117

Dear Ms. Bergman:

Great River Energy, Northern States Power Company, doing business as Xcel Energy, and ITC Midwest LLC (collectively, Utilities) respectfully submit the enclosed Supplement Comments to the Minnesota Public Utilities Commission regarding the above-captioned docket.

This document has been e-filed today through www.edockets.state.mn.us. A copy of this filing is also being served upon the persons on the attached Service List. If you have any questions or need additional information, please contact Dan Lesher at dlesher@greenergy.com, Jody Londo at jody.l.londo@xcelenergy.com, or Margaret Kristian at mkristian@itctransco.com.

Sincerely,

/s/ Dan Lesher

Dan Lesher
Manager, Transmission Permitting & Land Rights
Great River Energy





/s/ Jody Londo

Jody Londo
Director, Regulatory and Strategic Analysis
Northern States Power Company

/s/ Margaret Kristian

Margaret Kristian
Manager-Regulatory Strategy
ITC Midwest LLC



**STATE OF MINNESOTA
BEFORE THE
PUBLIC UTILITIES COMMISSION**

Katie Sieben
Joseph K. Sullivan
Audrey Partridge
Hwikwon Ham
John Tuma

Chair
Vice-Chair
Commissioner
Commissioner
Commissioner

**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**

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

**APPLICANTS' SUPPLEMENTAL
COMMENTS**

INTRODUCTION

Great River Energy, ITC Midwest LLC (ITC Midwest), and Northern States Power Company, doing business as Xcel Energy (together, Applicants), respectfully submit these Supplemental Comments in accordance with the Notice of Comment Period on Application Completeness (Notice) issued by the Minnesota Public Utilities Commission (Commission).

The Applicants submit these Supplemental Comments to address the reply comments submitted by Dale Thomforde and Carol Overland.¹ The Applicants continue to request that the Commission determine that the Application is complete and decline to order a contested case proceeding at this time, instead requesting that any further contested case requests be submitted with a petition to intervene and before the close of the scoping comment period in this matter such that the Commission can decide whether to order a contested case as part of its scoping decision.

¹ The reply comments raised many of the same issues as initial comments and Applicants responded to these issues in their reply comments. In these Supplemental Comments, the Applicants address the Thomforde and Overland reply comments only to the extent they raise different or additional issues than the initial comments.

SUPPLEMENTAL COMMENTS

I. Dale Thomforde

Dale Thomforde’s reply comments provide additional discussion of a system alternative he titles, “No Build Pleasant Valley to North Rochester.”² The comments do not raise a completeness issue, and evaluation of system alternatives will be part of the forthcoming scoping process. Evaluation of system alternatives is a critical component of the Certificate of Need process, and the Application included an entire chapter—more than 40 pages—dedicated to this analysis. The Commission’s rules identify the types of system alternatives that must be analyzed in the Application, and the Application complies with those rules.³ Additional system alternatives may be proposed during the process but are not required for an application to be determined complete. The Applicants will carefully evaluate each system alternative proposed in this proceeding, and the Commission will do the same.

Based on the Applicants’ review of Thomforde’s comments, his system alternatives would include: changing the endpoint of the Gopher to Badger Link Project from North Rochester to Pleasant Valley; and/or eliminating the proposed 765 kV line between Pleasant Valley and North Rochester. Either proposal results in a different configuration with modified end points. As an initial matter, a system alternative with alternative endpoints would not be studied under Minnesota law for this Project absent the Applicants’ consent because it is not consistent with the end points identified in the applicable federally registered planning authority transmission plan.⁴ Further, the Applicants understand that, when studying Tranche 2.1, the Midcontinent Independent System Operator, Inc. (MISO) determined that both the North Rochester and the Pleasant Valley

² D. Thomforde Reply Comments (February 27, 2026) (eDockets No. [20262-228755-01](#)).

³ Minn. R. 7849.0330; Application Ch. 7.

⁴ See Minn. Stat. § 216B.243, subd. 3(6).

Substations should have two 765 kilovolt (kV) line sources to ensure a robust and resilient design. The alternative proposed by Thomforde does not do this. To the extent this alternative is proposed during scoping for this Project, the Applicants will provide a more detailed response to this and other system alternatives in forthcoming comment periods.

II. Carol Overland

On behalf of herself, Carol Overland submitted two sets of reply comments. The February 27, 2026, reply comments discuss Xcel Energy's peak demand from Securities and Exchange Commission filings.⁵ The March 2, 2026, reply comments reiterate issues related to Overland's request for a contested case and other procedural issues.⁶ Applicants address both sets of reply comments, in turn.

First, Overland's February 27 reply comments make assertions regarding Xcel Energy's historical peak demands and then conclude that a contested case is warranted. However, the Application discusses the need for the Project and the Tranche 2.1 Portfolio at length, and both the Applicants' and MISO's analysis is focused in forecasted peak demand rather than historical demand and is also broader than one utility's peak demand.⁷ Overland's comments do not undermine the analysis in the Application nor, again, do they identify any entity or person who wishes to intervene, present testimony, and otherwise more broadly participate in a contested case proceeding.

Second, with respect to process, Overland asserts that "there is no informal process," and that the Certificate of Need Application should be stayed and processed jointly with a route permit application. The Applicants disagree on both counts. Minnesota Rule 7829.1200 provides for the

⁵ C. Overland Reply Comments (February 27, 2026) (eDockets No. [20262-228767-01](#)).

⁶ C. Overland Reply Comments (March 2, 2026) (eDockets No. [20263-228848-01](#)).

⁷ See Application §§ 4-7 and Appendix E.

Commission’s informal process, and the Commission has used this process regularly in other dockets while also allowing for substantial public participation.⁸ Regarding a joint hearing, the Applicants filed the Certificate of Need Application in February 2026 and plan to file three separate route permit applications beginning in approximately February 2027. Given that there will be an entire year between the filing of the Certificate of Need Application and the first route permit application submittal, joint hearings would not be “feasible or more efficient.” Likewise, joint hearings are not in the public interest because individual route permit proceedings will allow for robust public participation and record development for each route under consideration.

CONCLUSION

Applicants respectfully request that the Commission determine that the Application is complete. The Applicants further request that the Commission decline to order a contested case proceeding at this time and request that further contested case requests be submitted with a petition to intervene and before the close of the scoping comment period.

⁸ See *In the Matter of the Application of Xcel Energy for a Certificate of Need for the Minnesota Energy Connection Project in Sherburne, Stearns, Kandiyohi, Wright, Meeker, Chippewa, Yellow Medicine, Renville, Redwood, and Lyon counties in Minnesota*, eDockets No. E-002/CN-22-131; *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*, eDockets No. E-015, ET-2/CN-22-416.

Dated: March 9, 2026

/s/ Lisa M. Agrimonti

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