



March 2, 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 Reply Comments, including Attachments A and B, to the Minnesota Public Utilities Commission regarding the above-captioned docket.

These documents have 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' REPLY 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 Reply Comments in accordance with the Notice of Comment Period on Application Completeness (Notice) issued by the Minnesota Public Utilities Commission (Commission).

As described in more detail herein, the Certificate of Need Application (Application) submitted by the Applicants for the PowerOn Midwest Project (Project) contains the information required by Minnesota law. Accordingly, Applicants respectfully request that the Commission determine that the Application is complete.

With respect to the process by which the Application should be considered, only one commenter (Carol Overland) requested a contested case. Although the Applicants do not necessarily oppose a contested case proceeding, Overland's comments do not identify contested issues of material fact under Minnesota law that would benefit from a contested case proceeding, nor do the comments identify any parties who would intervene, file testimony, and otherwise participate in a formal contested case proceeding. Without these basic prerequisites, the value of a contested case is unclear. However, the Applicants recognize the scale and significance of the

Project, and the Commission itself may determine that a contested case would be beneficial. To allow for full development of the record—whether under the informal or contested case process—and also avoid potential schedule delays in the future, the Applicants respectfully 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 in this matter to allow the Commission to resolve such requests when it considers the scope of the Environmental Report.

BACKGROUND

Prior to filing the Application, the Applicants submitted their Request for Exemption from Certain Certificate of Need Application Content Requirements (Exemption Requests), in which the Applicants identified application content requirements that were not relevant to the Project and/or for which the Applicants proposed to provide alternative information.¹ The Exemption Requests were unopposed, and the Commission approved the Exemption Requests on November 26, 2025.²

On February 3, 2026, the Applicants filed the Application.³ The Application included a completeness checklist (Appendix A) that identified where in the Application the information required by statute, rule, and/or exemption was located.⁴ Thereafter, the Commission issued the Notice requesting initial comments by February 23, 2026; reply comments by March 2, 2026; and

¹ Exemption Requests with Attachment A (October 1, 2025) (eDockets No. [202510-223482-03](#)).

² PUC Order (November 26, 2025) (eDockets No. [202511-225329-01](#)).

³ Application (February 3, 2026) (eDockets No. [20262-227787-02](#)).

⁴ Appendix A Completeness Checklist (February 3, 2026) (eDockets No. [20262-227787-03](#)).

supplemental comments by March 9, 2026.⁵ The Notice requested comments on the following topics:

- Does the Application contain the information required under Minn. R. 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 any additional issues or concerns related to this matter?

Prior to the close of the initial comment period, comments were submitted by: Leech Lake Band of Ojibwe (LLBO);⁶ Energy Infrastructure Permitting (EIP) Staff;⁷ Department of Commerce, Division of Energy Resources (DOC-DER);⁸ Midcontinent Independent System Operator, Inc. (MISO);⁹ Minnesota Center for Environmental Advocacy, Citizens Utility Board of Minnesota, Sierra Club, Clean Grid Alliance, and Fresh Energy (Joint Commenters);¹⁰ and four members of the public.¹¹ The Applicants respond to each of these comments, in turn, below.

⁵ PUC Notice of Comment Period on Application Completeness (February 9, 2026) (eDockets No. [20262-227934-01](#)).

⁶ Leech Lake Band of Ojibwe Comments (February 13, 2026) (eDockets No. [20262-228164-01](#)) (hereinafter, LLBO Comments).

⁷ PUC EIP Staff Comments (February 23, 2026) (eDockets No. [20262-228479-01](#)) (hereinafter, EIP Staff Comments).

⁸ DOC-DER Comments (February 23, 2026) (eDockets No. [20262-228520-01](#)) (hereinafter, DOC-DER Comments).

⁹ MISO Comments (February 23, 2026) (eDockets No. [20262-228451-01](#)) (hereinafter, MISO Comments).

¹⁰ Joint Commenters' Comments (February 23, 2026) (eDockets No. [20262-228517-01](#)) (hereinafter, Joint Commenters' Comments).

¹¹ C. Jessen Comments (February 12, 2026) (eDockets No. [20262-228093-01](#)) (hereinafter, Jessen Comments); D. Thomforde Notice Comments (February 17, 2026) (eDockets No. [20262-228260-01](#)) (hereinafter, Thomforde Notice Comments); D. Thomforde System Alternative Comments (February 18, 2026) (eDockets No. [20262-228287-01](#)) (hereinafter, Thomforde System Alternative Comments); K. Johnson Comments (February 23, 2026) (eDockets No. [20262-228467-01](#)) (hereinafter, Johnson Comments); Overland Comments (February 23, 2026) (eDockets No. [20262-228523-01](#)) (hereinafter, Overland Comments).

REPLY

I. LLBO

LLBO states that it does not have any recorded historic properties in the Project area and recommends that the Applicants consult with the Lower Sioux Indian Community and the Ho-Chunk Nation.¹² The Applicants appreciate LLBO's comments and participation in this docket. The Applicants have provided the Lower Sioux Indian Community with information regarding the Project and will continue to do so as Project development proceeds. The Applicants had not previously reached out to the Ho-Chunk Nation regarding the Project because the federal government's Tribal Directory Assessment Tool did not identify that Tribe as having an interest in the Project area. The Applicants have now sent correspondence to the Ho-Chunk Nation regarding the Project and will include the Tribe on the Project mailing list going forward to ensure that the Tribe is kept informed regarding the Project.

II. EIP Staff

EIP Staff concludes that the Application includes the environmental information required by Minn. R. 7849.0310.¹³ EIP Staff also requests that the Commission vary Minn. R. 7849.1200 and 7849.1400 to recognize that EIP Staff, not the Department of Commerce, will prepare the environmental report in this proceeding.¹⁴ The Applicants appreciate EIP Staff's review of the Application and agree with EIP Staff's comments, including the requested variance.

III. DOC-DER

In its initial comments, DOC-DER provides background on the Project, including its development as part of MISO's Long Range Transmission Planning (LRTP) Tranche 2.1

¹² LLBO Comments at 1.

¹³ EIP Staff Comments at 1; *see* Minn. R. 7849.0310.

¹⁴ EIP Staff Comments at 1.

Portfolio.¹⁵ With respect to completeness, DOC-DER states that it “finds the application includes information that addresses Minnesota Rule chapter 7849.0220, subp. 2 and recommends declaring the application substantially complete.”¹⁶ The Applicants appreciate DOC-DER’s review of the Application and agree with this recommendation.

Elsewhere in its initial comments, DOC-DER identifies additional questions and/or topics regarding the Project.¹⁷ It is unclear to the Applicants when DOC-DER is requesting that the Applicants respond to the questions posed in DOC-DER’s comments. The questions and topics identified by DOC-DER are not application content requirements under Minn. R. 7849.0220, subp. 2. The Applicants are committed to working with DOC-DER to continue to develop this record but note that many of the topics raised in DOC-DER’s comments would require additional substantive analysis that is not currently available. For example, DOC-DER asks Applicants to prepare and provide “an economic analysis of how the project prevents curtailment and increases revenues to counties in the form of wind production tax credits.”¹⁸ Likewise, some of the other topics/questions raised by DOC-DER go to the merits of the Application that may be developed in this record and/or issues that are better addressed in other dockets or forums.

The Applicant’s review of DOC-DER’s initial comments identified three items which it appears DOC-DER requests be provided during this completeness comment period, and Applicants provide that information with these Reply Comments.

¹⁵ DOC-DER Comments at 1.

¹⁶ DOC-DER Comments at 7.

¹⁷ DOC-DER Comments at 2.

¹⁸ DOC-DER Comments at 6. The Applicants note that Section 6.5.2 of the Application contains analysis of the Studied Projects’ reduction in renewable generation curtailment.

First, DOC-DER asks the Applicants to ensure that the completeness checklist matches the location of the information or data in the Application.¹⁹ The Applicants have reviewed the completeness checklist provided as Appendix A to the Application, and an updated version is included as **Attachment A** to these comments. The updated version includes minor corrections and clarifications (*i.e.*, more specific subsection references).

Second, DOC-DER asks the Applicants to provide “a simple table listing the counties” in the Project Notice Area. Table 1, below, lists the counties in the Project Notice Area.²⁰

Table 1 Counties in Project Notice Area²¹
Lincoln
Pipestone
Rock
Lyon
Murray
Nobles
Redwood
Cottonwood
Jackson
Martin
Faribault
Waseca
Freeborn
Steele
Mower
Dodge
Olmsted
Goodhue
Dakota

Third, DOC-DER states that Appendix D, which includes Xcel Energy’s annual revenue requirement for the Project, does not include an explanation or caption, and asks the Applicants to

¹⁹ DOC-DER Comments at 4.

²⁰ DOC-DER Comments at 6.

²¹ List includes counties entirely or partially within Project Notice Area, moving approximately from west to east.

respond to DOC-DER's comments with an updated Appendix D.²² As an initial matter, the Appendix D included in the Application is consistent with the exemption request approved by the Commission, as well as prior similar filings.²³ Regardless, to aid in the public's review of the Application, an updated cover page to Appendix D that includes explanations regarding what is depicted in each table is included as **Attachment B** to these Reply Comments.²⁴

IV. MISO

MISO's comments provide background on the development of LRTP Tranche 2.1, summarize benefits to Minnesota and the region, and indicate support for evaluation of the Application using the Commission's informal process.²⁵ The Applicants appreciate MISO's comments and agree with its recommendation.

V. Joint Commenters

Joint Commenters recommend review of the Application using the Commission's informal process, noting that the need for and benefit of the Project have been well-documented as part of the LRTP Tranche 2.1 development process.²⁶ The Applicants appreciate Joint Commenters' participation in this docket and agree with their recommendation.

²² DOC-DER Comments at 7.

²³ See *In the Matter of Mankato – Mississippi River Transmission Project Certificate of Need and Route Permit Application*, eDockets No. E002/CN-22-532 & E002/TL-23-157, Appendix J – Ratepayer Impacts (Apr. 2, 2024); *Big Stone South – Alexandria – Big Oaks 345 kV Transmission Project Certificate of Need Application*, Docket No. CN-22-538, Appendix H – Xcel Energy Rate Impacts Calculations (Sept. 9, 2023).

²⁴ The contents of Appendix D are unchanged.

²⁵ MISO Comments at 1-2.

²⁶ Joint Commenters' Comments at 2.

VI. Individual Commenters

A. Chris Jessen

Chris Jessen is a landowner near Pine Island, Minnesota, with parcel-specific questions about the potential location of the Project.²⁷ The Applicants anticipate filing route permit applications no earlier than February 2027 and are currently in the early stages of route development. The Applicants anticipate holding routing open houses in early Summer 2026 and will ensure that Jessen receives notice of those open houses and that the information provided in these comments is evaluated as part of route development.

B. Dale Thomforde

Dale Thomforde submitted comments requesting clarification regarding Project notices and indicating there may be landowners within the Notice Area who had not received notice of the Project.²⁸ The Applicants followed up with Thomforde and, as a result, added one mailing address to the notice list. The Applicants appreciate Thomforde raising this issue. As described in the Notice Plan Petition,²⁹ the Applicants obtained landowner and resident mailing addresses from county tax assessment rolls, where available, as well as the Minnesota Geospatial Commons administered by the State of Minnesota (where available), ReportAll USA, the United States Post Office, and other commercially available sources. In this instance, it appears that the county information was incomplete, and the Applicants have now updated the mailing list and made the county aware. The Applicants will continue to incorporate any updates received from landowners/residents into the Project mailing list.

²⁷ Jessen Comments at 1-2.

²⁸ Thomforde Notice Comments at 2.

²⁹ Thomforde Notice Comments at 1; *see* Notice Plan Petition with Attachments 1-6 (October 1, 2026) (eDockets No. [202510-223482-02](#)).

Thomforde also submitted comments describing a system alternative Thomforde will propose regarding the Gopher to Badger Link Project in Docket No. CN-25-121, and noted that the system alternative may also impact this Project.³⁰ The comments do not raise a completeness issue, and Applicants note that proposal and evaluation of system alternatives will be part of the forthcoming scoping process. As an initial matter, it appears that this is a system alternative with alternative endpoints for the Gopher to Badger Link Project and should thus be addressed within Docket No. CN-25-121.

C. Kyle Johnson

Kyle Johnson asserts that the Application should have considered a specific type of high-voltage direct current (HVDC) system alternative (a 525 kilovolt (kV) HVDC line).³¹ Similarly, Johnson asserts that the Application should consider an underground HVDC line and should “stay these proceedings and compel the applicants to submit a . . . analysis of an underground 525 kV alternative—specifically evaluating its co-location along existing transportation corridors—before any final determination is made.”³² The Application includes the evaluation of a 640/600 kV HVDC line because it is closest in capacity to 765 kV AC; a 525 kV HVDC line does not provide equivalent capacity. Further, the assertion that the total length of 765 kV line is at a threshold where HVDC may be cost-effective ignores that there are three termination points in Minnesota, and additional points outside of Minnesota. Each termination point connects to the AC grid and would require an AC/DC converter station.

Overall, although the comments are, at times, framed in terms of completeness, the comments generally assert that HVDC is a superior alternative to the Project. That is not a

³⁰ Thomforde System Alternative Comments at 2-3.

³¹ Johnson Comments at 3.

³² Johnson Comments at 13.

completeness issue, and the merits of the Project as compared to other alternatives will be developed as part of this record. The Commission's rules require applications to include, among other things, a discussion of the following alternatives: a DC transmission line (if the proposed facility is alternating current (AC)); and an underground transmission line (if the proposed facility is an overhead transmission line).³³ The Application analyzes both alternatives as part of its extensive alternatives analysis, including explaining why the Applicants are not proposing HVDC for the Project:

As a general rule, HVDC becomes a cost-effective alternative to AC transmission when the line length is greater than 260 miles and high transfer capability is needed. As detailed in Section 1.2.1, the Project is made up of a series of individual facilities, each providing delivery points between generation and demand. The Project's longest segment is between the Lakefield Junction Substation and the Pleasant Valley Substation. MISO estimated this segment to be 130 miles, which is much shorter than the threshold for which HVDC is cost effective.³⁴

The Application likewise discussed the Applicants' evaluation of an underground transmission line as an alternative to the Project as proposed.³⁵ If proposed during the forthcoming scoping period, an HVDC alternative (lower- or higher-voltage and above- or below-ground) may be considered further in this record, but the Applicants respectfully submit that the alternatives analysis in the Application satisfies the Commission's content requirements.

D. Carol Overland

On behalf of herself, Carol Overland submitted comments asserting that: (1) the Commission should have mailed notice of the completeness comment period to landowners in the Notice Area; (2) the Application "arguably" contains the required information, but the

³³ See Minn. R. 7849.0260.

³⁴ Application § 7.4.4.

³⁵ Application § 7.4.5.

Commission should have granted fewer or different exemptions from the content requirements; and (3) there are contested issues of fact warranting a contested case proceeding, rather than the Commission’s informal process.³⁶ The Applicants disagree on each count.

1. Mailed notice of completeness comment period.

Overland asserts that the Commission should have mailed notice of the completeness comment period to all landowners in the Notice Area.³⁷ Overland cites no legal support for this argument, and there is none. Members of the public in the Notice Area received notice of the Project through the Applicants’ implementation of their Notice Plan. That notice included information about how to subscribe to and participate in the docket.³⁸ Likewise, landowners and residents in the Notice Area will receive notice of the scoping meetings and public hearings, where substantive comments on the Project are sought.³⁹ There is no separate requirement to mail notice of the completeness comment period to all landowners.

2. Application Content & Exemptions.

Next, Overland acknowledges that the Application “arguably contains the information required as exempted by the Commission’s Order,” but asserts that the Commission should have granted fewer or different exemptions.⁴⁰ Now is not the time to argue about the application content exemptions. Rather, after the Applicants filed their Request for Exemption on October 1, 2025,

³⁶ Overland’s comments also variously refer to combined need and routing proceedings, but these comments appear to refer to the Gopher to Badger Link Project, which is being considered by the Commission in a separate docket. *See* Overland Comments at 27. Because Overland’s comments related to that project are not relevant here, the Applicants do not address them further.

³⁷ Overland Comments at 2.

³⁸ Notice Plan Filing with Attachment A-F (February 2, 2026) (eDockets No. [20262-227739-01](#)).

³⁹ Notice Plan Filing with Attachment A-F (February 2, 2026) (eDockets No. [20262-227739-01](#)).

⁴⁰ Overland Comments at 3.

the Commission opened and comment period and requested comments regarding the Request.⁴¹ The Commission accepted three rounds (initial, reply, and supplemental) of comments. If there was a dispute about the Request for Exemption, it should have been raised at that time. However, no dispute was raised, and the Request for Exemption was approved on the Commission's consent agenda on November 26, 2025.⁴² Even then, anyone disputing the approval had 10 days to file an objection to the order.⁴³ No objections were filed. It is too late to challenge the exemptions now and, as Overland notes, the exemptions do not limit the information that could further be developed in this record for the Commission's consideration.⁴⁴

3. *Contested Issues.*

Overland asserts that there are contested issues of fact warranting a contested case proceeding – primarily, whether MISO's analysis of Tranche 2.1 in 2024 remains valid today and sufficient to support the issuance of a certificate of need under Minnesota law.⁴⁵ As an initial matter, the Applicants are not necessarily opposed to a contested case, provided that actual contested issues are identified, and there are potential parties who will intervene, file testimony, and otherwise participate in a contested case. Here, however, although Overland's comments list out many topics, they do not clearly identify a material issue of contested fact related to the criteria for granting a certificate of need under Minnesota law, nor do they explain why the informal process is insufficient to address those topics. Further, Overland does not identify any potential parties to the proceeding or otherwise indicate who may intervene, provide testimony, and

⁴¹ PUC Notice of Comment Period on Notice Plan Petition and Exemption Requests (October 7, 2025) (eDockets No. [202510-223642-01](#)).

⁴² PUC Order (November 26, 2025) (eDockets No. [202511-225329-01](#)).

⁴³ PUC Order at 1 (November 26, 2025) (eDockets No. [202511-225329-01](#)).

⁴⁴ Overland comments at 3.

⁴⁵ Overland Comments at 10.

otherwise participate in a formal contested case proceeding. Regardless, the Applicants provide brief responses to the categories of topics raised by Overland below.

First, Overland argues that the Commission should carefully evaluate all projects' cost increases, including the Project. Applicants fully anticipate that the cost of the Project will be evaluated in detail in this docket.⁴⁶

Second, Overland's comments include various assertions related to MISO's analysis of Tranche 2.1, including its cost-benefit analysis and the comments of the MISO Independent Market Monitor (IMM).⁴⁷ Overland does not explain how MISO's economic analysis or the IMM are relevant to the criteria for the issuance of a certificate of need under Minnesota law and, as such, it is unclear why these topics would warrant a contested case at this time.

Next, Overland asserts that the Project's benefits along the transmission corridor is a contested issue of fact.⁴⁸ Overland then asserts that the presence of other existing and proposed transmission lines in southern Minnesota calls the Project's need into question.⁴⁹ Here again, Overland does not explain what the actual contested issue of material fact is, and why a contested case is necessary to resolve it (as compared to record development under the informal process).

Further, Overland asserts that there are system alternatives to meet the Project's need.⁵⁰ The Applicants agree that the evaluation of system alternatives is a fundamental component of this proceeding. The Application analyzes multiple system alternatives as part of its extensive

⁴⁶ Overland Comments at 18-19.

⁴⁷ Overland Comments at 17-18.

⁴⁸ Overland Comments at 12.

⁴⁹ Overland Comments at 14.

⁵⁰ Overland Comments at 17.

alternatives analysis.⁵¹ In addition, the upcoming scoping process will provide members of the public opportunity to propose system alternatives for potential study in the Environmental Report.

Overland also asserts that expected and maximum capacity, line losses, HVDC as an alternative, undergrounding as an alternative, export capability, and 345 kV lines as steady state support are contested issues warranting a contested case.⁵² However, Overland does not explain why a contested case proceeding is necessary to develop the record on these topics.

Overall, Overland's comments list out a miscellany of topics that could be evaluated as part of this Certificate of Need proceeding and then jump to the conclusion that a contested case proceeding is necessary to more fully address these topics. However, Overland does not explain why the informal process is insufficient, nor do the comments identify any parties who would seek to intervene, file testimony, provide witnesses, and more broadly participate in a formal contested case. As stated previously, although the Applicants are not, per se, opposed to a contested case proceeding, the basic prerequisites for a worthwhile and valuable contested case proceeding do not appear to be present at this time.

4. *Other Issues.*

Finally, Overland asserts there are additional issues for the Commission's consideration in this matter, including review of system alternatives and environmental analysis.⁵³ The Applicants agree that this process will include analysis of system alternatives and the preparation of an Environmental Report.

⁵¹ The entirety of Chapter 7 of the Application—nearly 40 pages—is devoted to the Applicants' analysis of alternatives.

⁵² Overland Comments at 22-26.

⁵³ Overland Comments at 27-35.

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.

Dated: March 2, 2026

/s/ Lisa M. Agrimonti

Lisa M. Agrimonti (#0272474)
Haley L. Waller Pitts (#0393470)
FREDRIKSON & BYRON, P.A.
60 South Sixth Street
Suite 1500
Minneapolis, MN 55402-4400
(612) 492-7000

lagrimonti@fredlaw.com
hwallerpitts@fredlaw.com

**Attorneys for Great River Energy &
Northern States Power Company**

/s/ Valerie T. Herring

Valerie T. Herring (#0336865)
Kodi J. Verhalen (#0391056)
Taft Stettinius & Hollister LLP
2200 IDS Center
80 S. Eighth Street
Minneapolis, MN 55402
Telephone:(612) 977-8400

vherring@taftlaw.com
kverhalen@taftlaw.com

Attorneys for ITC Midwest LLC



Appendix A

Completeness Checklist

Appendix A 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. 25-117 on October 1, 2025 eDocket No. 202510-223482-03	
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 eDocket No. 20262-227787-15	
Minn. R. 7849.0200, subp. 2	Title Page and Table of Contents	TOC	
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	

Appendix A Completeness Checklist			
AUTHORITY	REQUIRED INFORMATION	LOCATION IN APPLICATION	EXEMPTION REQUESTED
B.	Promotional activities that may have given rise to the demand for the facility; and	6.8	
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;	2.2	
(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 6.6.3
(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 2.3	
(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

Appendix A Completeness Checklist			
AUTHORITY	REQUIRED INFORMATION	LOCATION IN APPLICATION	EXEMPTION REQUESTED
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;	2.4; Ch. 7	
(2)	Service life;	3.4.3; Ch. 7	
(3)	Estimated average annual availability;	9.5	
(4)	Estimated annual O&M costs in current dollars;	2.4.2	
(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 6.6.3
(7)	Major assumptions made in subitems (1) – (6)	1.6; 2.4.1; 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 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:		

Appendix A Completeness Checklist			
AUTHORITY	REQUIRED INFORMATION	LOCATION IN APPLICATION	EXEMPTION REQUESTED
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:		
(1)	Farm;		
(2)	Irrigation and drainage pumping;		
(3)	Nonfarm residential;		
(4)	Commercial;		
(5)	Mining;		
(6)	Industrial;		
(7)	Street and highway lighting;		
(8)	Electrified transportation;		
(9)	Other (including municipal water pumping, oil/gas pipeline pumping, military, all other consumers not reported in subitems (1)-(8)); and		
(10)	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;		

Appendix A Completeness Checklist			
AUTHORITY	REQUIRED INFORMATION	LOCATION IN APPLICATION	EXEMPTION REQUESTED
(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		
(1)	Strengths and weaknesses;		
(2)	Suitability to the system;		
(3)	Cost considerations;		
(4)	Data requirements;		
(5)	Past accuracy; and		
(6)	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:		
(1)	Nature of adjustment;		
(2)	Reason for adjustment; and		
(3)	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.		

Appendix A Completeness Checklist			
AUTHORITY	REQUIRED INFORMATION	LOCATION IN APPLICATION	EXEMPTION REQUESTED
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; 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
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
(1)	Seasonal system demand;		
(2)	Annual system demand;		
(3)	Total seasonal firm purchases;		
(4)	Total seasonal firm sales;		
(5)	Seasonal adjusted net demand;		
(6)	Annual adjusted net demand;		
(7)	Net generating capacity;		
(8)	Total participation purchases;		
(9)	Total participation sales;		
(10)	Adjusted net capability;		
(11)	Net reserve capacity obligation;		
(12)	Total firm capacity obligation; and		
(13)	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

Appendix A Completeness Checklist			
AUTHORITY	REQUIRED INFORMATION	LOCATION IN APPLICATION	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
Minn. R. 7849.0290	Conservation Programs		Exemption requested; substitute information included in Chapters 5 and 7.3.6, and Appendix D 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		

Appendix A Completeness Checklist			
AUTHORITY	REQUIRED INFORMATION	LOCATION IN APPLICATION	EXEMPTION REQUESTED
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 6.7 and 7.7
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	
(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; Figure 1.6-1; 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	2.6	

Appendix A Completeness Checklist			
AUTHORITY	REQUIRED INFORMATION	LOCATION IN APPLICATION	EXEMPTION REQUESTED
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 6.7 and 7.7



Appendix A

Completeness Checklist

Attachment A

PowerOn Midwest

Application for a Certificate of Need
Appendix A: Completeness Checklist

Appendix A 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. 25-117 on October 1, 2025 eDocket No. 202510-223482-03	
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 eDocket No. 20262-227787-15	
Minn. R. 7849.0200, subp. 2	Title Page and Table of Contents	TOC	
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	
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;	2.2	
(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 6-6.46.6.3
(4)	Approximate length of the proposed line;	1.2.1	

Appendix A Completeness Checklist			
AUTHORITY	REQUIRED INFORMATION	LOCATION IN APPLICATION	EXEMPTION REQUESTED
(5)	Approximate locations of DC terminals or AC substations on a map; and	Figure 1.8-1 and Section 2.3	
(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;	2.4; Ch. 7	
(2)	Service life;	3.4.3; Ch. 7	
(3)	Estimated average annual availability;	9.5	
(4)	Estimated annual O&M costs in current dollars;	2.4.2	
(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 6-6.46 6.3
(7)	Major assumptions made in subitems (1) – (6)	1.6; 2.4.1; 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 and F

Attachment A

PowerOn Midwest

Application for a Certificate of Need
Appendix A: Completeness Checklist

Appendix A Completeness Checklist			
AUTHORITY	REQUIRED INFORMATION	LOCATION IN APPLICATION	EXEMPTION REQUESTED
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:		
(1)	Farm;		
(2)	Irrigation and drainage pumping;		
(3)	Nonfarm residential;		
(4)	Commercial;		
(5)	Mining;		
(6)	Industrial;		
(7)	Street and highway lighting;		
(8)	Electrified transportation;		
(9)	Other (including municipal water pumping, oil/gas pipeline pumping, military, all other consumers not reported in subitems (1)-(8)); and		
(10)	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		
(1)	Strengths and weaknesses;		
(2)	Suitability to the system;		
(3)	Cost considerations;		
(4)	Data requirements;		
(5)	Past accuracy; and		

Attachment A

PowerOn Midwest

Application for a Certificate of Need
Appendix A: Completeness Checklist

Appendix A Completeness Checklist			
AUTHORITY	REQUIRED INFORMATION	LOCATION IN APPLICATION	EXEMPTION REQUESTED
(6)	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:		
(1)	Nature of adjustment;		
(2)	Reason for adjustment; and		
(3)	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.	4.4.2.2 1.4.2; 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
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
(1)	Seasonal system demand;		
(2)	Annual system demand;		
(3)	Total seasonal firm purchases;		
(4)	Total seasonal firm sales;		
(5)	Seasonal adjusted net demand;		
(6)	Annual adjusted net demand;		
(7)	Net generating capacity;		
(8)	Total participation purchases;		

Attachment A

PowerOn Midwest

Application for a Certificate of Need
Appendix A: Completeness Checklist

Appendix A Completeness Checklist			
AUTHORITY	REQUIRED INFORMATION	LOCATION IN APPLICATION	EXEMPTION REQUESTED
(9)	Total participation sales;		
(10)	Adjusted net capability;		
(11)	Net reserve capacity obligation;		
(12)	Total firm capacity obligation; and		
(13)	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
Minn. R. 7849.0290	Conservation Programs		Exemption requested; substitute information included in Chapters 5 and 7.3.6 , and Appendix D 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.		

Attachment A

PowerOn Midwest

Application for a Certificate of Need
Appendix A: Completeness Checklist

Appendix A Completeness Checklist			
AUTHORITY	REQUIRED INFORMATION	LOCATION IN APPLICATION	EXEMPTION REQUESTED
Minn. R. 7849.0300	Consequence of Delay (three levels of demand)		Exemption requested; substitute information included in Chapters 6.7 and 7.7
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	
(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; Figure 1.6-1 ; 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	2.6	
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 6.7 and 7.7

Summary report:	
Litera Compare for Word 11.7.0.54 Document comparison done on 2/26/2026 2:12:21 PM	
Style name: Default Style	
Intelligent Table Comparison: Active	
Original filename: App A_Application Completeness Checklist.docx	
Modified filename: App A_Application Completeness Checklist Updated.docx	
Changes:	
<u>Add</u>	10
Delete	7
Move From	0
<u>Move To</u>	0
<u>Table Insert</u>	0
Table Delete	0
<u>Table moves to</u>	0
Table moves from	0
Embedded Graphics (Visio, ChemDraw, Images etc.)	0
Embedded Excel	0
Format changes	0
Total Changes:	17



Appendix D (Revised)

Xcel Energy Revenue Requirement

Note:

The Commission's rules require an applicant to provide the annual revenue requirements to recover the costs of a proposed project. The Applicants requested an exemption from this rule requirement and, for Xcel Energy, the Commission authorized Xcel Energy to instead provide a summary of its annual revenue requirement for the capital costs of the Project for a 20-year period. This Appendix D thus includes Xcel Energy's annual revenue requirement for the capital costs of the Project for a 20-year period, considering both the base and high costs presented in the Application.

- The tables labeled "Project Summary" depict the total "all-in" and "year-1" revenue requirement for the Project on their respective tabs. These tables include the total NSP revenue requirement, the applicable interchange allocator, the Minnesota demand allocator, and the resulting Minnesota-jurisdictional share.
- The tables labeled "Total – NSP Project Cost" depict the full year-by-year summary of the NSP revenue requirement and Minnesota-jurisdictional revenue requirement.
- The tables labeled "Rev. Req. Line" and "Rev. Req. Sub." depict the detailed annual revenue-requirement calculations for the transmission line and substation components, respectively, of the Project. Both the "Rev. Req. Line" and "Rev. Req. Sub" tabs contain full calculations of rate base, depreciation, accumulated deferred income tax, tax depreciation, property tax, return, income taxes, and total annual revenue requirement for the transmission line and substation portions, respectively.
- The tables labeled "Key Inputs" identify the inputs and/or assumptions used in the analysis.

**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

CERTIFICATE OF SERVICE

Breann L. Jurek certifies that on the 2nd of March, 2026, she e-filed a true and correct copy of the **Reply Comments, with Attachments A and B** on behalf of Great River Energy, Northern States Power Company, doing business as Xcel Energy, and ITC Midwest LLC via eDockets (www.edockets.state.mn.us).

Said documents were also served as designated on the Official Service List on file with the Minnesota Public Utilities Commission and as attached hereto.

Executed on March 2, 2026

Signed: /s/ Breann L. Jurek

Fredrikson & Byron, P.A.

60 South Sixth Street

Suite 1500

Minneapolis, MN 55402

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Lisa	Agrimonti	lagrimonti@fredlaw.com	Fredrikson & Byron, P.A.		60 South Sixth Street Suite 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	25-117 Official
2	Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP		50 S 6th St Ste 1500 Minneapolis MN, 55402-1498 United States	Electronic Service		No	25-117 Official
3	Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	25-117 Official
4	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	25-117 Official
5	Paul	Blom				49323 125th Street Bricelyn MN, 56014 United States	Paper Service		No	25-117 Official
6	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	25-117 Official
7	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	25-117 Official
8	James	Canaday	james.canaday@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota St. St. Paul MN, 55101 United States	Electronic Service		No	25-117 Official
9	Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	25-117 Official
10	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	25-117 Official
11	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	25-117 Official
12	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	25-117 Official
13	Riley	Conlin	riley.conlin@xcelenergy.com	Northern States Power Company dba		414 Nicollet Mall, 401 8th Floor	Electronic Service		No	25-117 Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Xcel Energy-Elec		Minneapolis MN, 55401 United States				
14	Hillary	Creurer	hcreurer@allete.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	25-117 Official
15	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	25-117 Official
16	Ian M.	Dobson	ian.m.dobson@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	25-117 Official
17	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	25-117 Official
18	Eric	Fehlhaber	efehlhaber@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	25-117 Official
19	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	25-117 Official
20	Ryan	Fisher	rfisher@itctransco.com	ITC Midwest LLC		3165 Edgewood Parkway SW Cedar Rapids IA, 52404 United States	Electronic Service		No	25-117 Official
21	Daryll	Fuentes	energy@usg.com	USG Corporation		550 W Adams St Chicago IL, 60661 United States	Electronic Service		No	25-117 Official
22	Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP		Suite 1750 220 South Sixth Street Minneapolis MN, 55402-1425 United States	Electronic Service		No	25-117 Official
23	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	25-117 Official
24	Annete	Henkel	mui@mnuutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	25-117 Official
25	Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S. Eighth Street Minneapolis MN, 55402 United States	Electronic Service		No	25-117 Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
26	Corey	Hintz	chintz@dakotaelectric.com	Dakota Electric Association		4300 220th Street Farmington MN, 55024-9583 United States	Electronic Service		No	25-117 Official
27	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	25-117 Official
28	Frank	Hornstein	frank.hornstein@minneapolismn.gov	City of Minneapolis		350 South 5th Street Minneapolis MN, 55415 United States	Electronic Service		No	25-117 Official
29	Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	25-117 Official
30	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	25-117 Official
31	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	25-117 Official
32	Richard	Johnson	rickjohnson@cozen.com	Cozen O'Connor		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	25-117 Official
33	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	25-117 Official
34	Breann	Jurek	bjurek@fredlaw.com	Fredrikson & Byron PA		60 S Sixth St Ste 1500 Minneapolis MN, 55402 United States	Electronic Service		No	25-117 Official
35	Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.		11 East Superior St Ste 125 Duluth MN, 55802 United States	Electronic Service		No	25-117 Official
36	Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S 8th St Minneapolis MN, 55402 United States	Electronic Service		No	25-117 Official
37	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	25-117 Official
38	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	25-117 Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
39	Dan	Leshner	dlesher@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	25-117 Official
40	Eric	Lipman	eric.lipman@state.mn.us		Office of Administrative Hearings	PO Box 64620 St. Paul MN, 55164-0620 United States	Electronic Service		No	25-117 Official
41	Jody	Londo	jody.l.londo@xcelenergy.com	Xcel Energy		414 Nicillet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	25-117 Official
42	Susan	Ludwig	sludwig@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	25-117 Official
43	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	25-117 Official
44	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	25-117 Official
45	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	25-117 Official
46	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	25-117 Official
47	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	25-117 Official
48	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	25-117 Official
49	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	25-117 Official
50	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	25-117 Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
51	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	25-117 Official
52	Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	25-117 Official
53	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		No	25-117 Official
54	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	25-117 Official
55	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	25-117 Official
56	Jennifer	Rhuppiah	jrhuppiah@itctransco.com	ITC Midwest LLC		Suite 230 Des Moines IA, 50309 United States	Electronic Service		No	25-117 Official
57	Susan	Romans	sromans@allete.com	Minnesota Power		30 West Superior Street Legal Dept Duluth MN, 55802 United States	Electronic Service		No	25-117 Official
58	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	25-117 Official
59	Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	25-117 Official
60	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	25-117 Official
61	Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	25-117 Official
62	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	25-117 Official
63	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	25-117 Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
64	Cary	Stephenson	cstephenson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	25-117 Official
65	Dusky	Terry	dterry@itctransco.com	ITC Midwest LLC			Electronic Service		No	25-117 Official
66	Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States	Electronic Service		No	25-117 Official
67	Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP		80 S 8th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	25-117 Official
68	Leonard	Wabasha	leonard.wabasha@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		2300 Tiwahe Circle Shakopee MN, 55379 United States	Electronic Service		No	25-117 Official
69	Haley	Waller Pitts	hwallerpitts@fredlaw.com	Fredrikson & Byron, P.A.		60 S Sixth St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	25-117 Official
70	Leanna	Whipple	lwhipple@itctransco.com	ITC Midwest LLC		100 East Grand Avenue, Suite 230 Des Moines IA, 50309 United States	Electronic Service		No	25-117 Official
71	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	25-117 Official
72	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	25-117 Official
73	Patrick	Zomer	pzomer@cozen.com	Cozen O'Connor		150 S. 5th Street, #1200 Minneapolis MN, 55402 United States	Electronic Service		No	25-117 Official