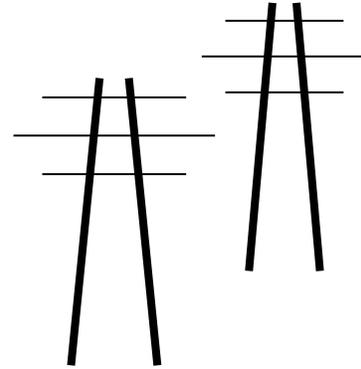


Legalelectric, Inc.

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1110 West Avenue
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March 4, 2026

Sasha Bergman
Executive Secretary
Public Utilities Commission
121 – 7th Place East
St. Paul, MN 55101

via eFiling only

RE: Reply Comment – Completeness and Process
Gopher-Badger/Maribell Transmission Line
PUC Docket E015/CN-25-121

Dear Ms. Bergman:

On behalf of the North Route Group and NO765LINE, attached please find Initial Comments on Completeness and Commission Process.

Please add to the Commission's Service List:

Suzanne Tomek
North Route Group
59419 – 400th Avenue
Zumbro Falls, MN 55991

John Pugleasa
NO765MN
3795 County 14
Caledonia, MN 55923

Bscape57@gmail.com

jjpugleasa@gmail.com

Thanks for your attention to this procedural matter.

Very truly yours,

A handwritten signature in cursive script that reads "Carol A. Overland". The signature is written in black ink and is positioned above the printed name.

Carol A. Overland
Attorney at Law

cc: North Route Group
NO765MN

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

**Katie J. Sieben
Hwikwon Ham
Audrey C. Partridge
Joseph K. Sullivan
John A. Tuma**

**Chair
Commissioner
Commissioner
Commissioner
Commissioner**

In the Matter of the Application for a Certificate
of Need for the Gopher to Badger Link
765kVHigh Voltage Transmission Line Project

DOCKET NO. ET3, E002/CN-25-121

CERTIFICATE OF SERVICE

REPLY COMMENT OF NORTH ROUTE GROUP AND NO765MN

I, Carol A. Overland, hereby certify that I have this day served a true and correct copy of the attached North Route Group and NO765MN Cover, Certificate of Service, Notice of Appearance, and Reply Comment to all persons at the email addresses on the Public Utilities Commission eDockets service list by eFiling and eService.



March 4, 2026

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BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

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In the Matter of the Application for a Certificate
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Docket No. ET3, E002/CN-25-121

**NOTICE OF APPEARANCE
NORTH ROUTE GROUP AND NO765MN**

Please take notice that the undersigned hereby appear as counsel for the North Route Group and NO765MN in the above-captioned docket. Please serve all further documents and correspondence pertaining to this docket on the following:

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March 4, 2026

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REPLY COMMENTS

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BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

**Katie J. Sieben
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In the Matter of the Application for a Certificate
of Need for the Gopher to Badger Link
765kVHigh Voltage Transmission Line Project

DOCKET NO. ET3, E002/CN-25-121

REPLY COMMENTS OF NORTH ROUTE GROUP AND NO765MN

The North Route Group and NO765MN offer the following Reply Comments on the several Initial Comments filed in this docket. As Reply Comments there is not much to say as those frequent intervenors Commenting, MISO, “Joint Commenters” and Commerce, had little to say other than “there are no contested issues of fact,” and “use the Commission’s informal process,” neither of which are credible positions. Other Commenters raised specific concerns that should be taken into account by the Commission.

I. MISO COMMENTS DEMONSTRATE ITS SELF-INTEREST IN ITS MARKET BASED “APPROVAL” OUTSIDE OF REGULATORY REVIEW AND SUPPORTS USE OF AN “INFORMAL PROCESS” TO AVOID A CONTESTED CASE.

MISO’s Initial Comments repeatedly toots its own horn promoting its “approval” of the MTEP24 Tranche 2.1 portfolio of 24 projects at a cost of \$21.868 BILLION, and appears to express entitlement based on “approval” of Tranche 2.1. The above-captioned project is a part of MISO’s project “26” from North Rochester substation north of Pine Island, Minnesota to Columbia substation, south of Portage, Wisconsin. In Minnesota, the project is two segments

totaling approximately 140 miles, and in Wisconsin from the River to the Columbia substation, roughly another 110 miles.

A. MISO SEEKS “AN EVALUATION BY THE COMMISSION RECOGNIZING THERE ARE NO CONTESTED ISSUES OF FACT.”

MISO’s unilateral presumption, stated twice, that there are “no contested issues of fact” is premature and presumptuous and even preposterous. This is the initial round of comments on completeness and process, and a statement that there are no contested issues of fact is without basis. Further, on examination of issues of fact raised in comments, it would seem this statement is not true. That is for the Commission to decide.

B. MISO STATES THAT THE APPLICATION SHOULD BE EVALUATED USING THE COMMISSION’S INFORMAL PROCESS.

MISO states three times that this Certificate of Need application should be evaluated using the Commission’s informal process. What “informal process” might this be? MISO offers no citation. The only “informal process” found in the Commission’s rules is Minn. R. 7829.1200, which is inapplicable. MISO should produce a citation for this “informal process.”

Equally important, the notion that an “informal process” should be used for a 765kV transmission project, of the first of its kind in Minnesota, running approximately 140 miles through the state and Driftless area across the Mississippi and then through Wisconsin for another 110 miles, based on MISO’s private planning process is misplaced. The Minnesota Public Utilities Commission is the regulator, not MISO, and this project deserves the Commission’s mandated scrutiny.

C. MISO CLAIMS “TRANSPARENT PLANNING PRINCIPLES,” “STAKEHOLDER INPUT THROUGHOUT,” AND “MULTIPLE OPPORTUNITIES FOR STAKEHOLDERS TO REVIEW NEED.”

MISO inserts the word “stakeholder” into its comment four times to encourage Tranche

2.1 approval by the Commission, as if, together with the “informal process,” the project does not warrant thorough Commission and/or public review. Who are these stakeholders? Are they non-profit organizations devoted to promotion of transmission “for renewables?” Are members of the public welcome to participate in planning meetings, or are they prohibited by dubious CEII restrictions? Is anyone, any entity, a stakeholder participating in this planning process that is not invested in expansion of and profit from transmission?

D. COST OF THE PROJECT IS A PRIMARY, MATERIAL, AND CONTESTED ISSUE OF FACT.

There are contested issues of fact. As an issue, cost plays out in two ways. First, there is the estimated cost of the line, and second is the use of that cost in MISO’s cost-benefit analysis that is used to justify promotion of the individual projects and Tranche 2.1 as a whole.

As noted in our Initial Comment, economics in the U.S. have changed dramatically from 2024 to the present, and in the last year, have notably changed for the worse, with tariffs and procurement difficulties making any cost estimate based on 2024 dollars invalid. Worse yet, the 1A Futures Report,¹ on which Tranche 2.1 is based, is from **November 1, 2023** using information developed prior to that time. The issue of material cost increases, the outdated cost estimates, and whether the project makes economic sense in 2026 cannot be ignored.

The cost increase of the project is a material fact because MISO “approval” and bringing forth Tranche 2.1 is based not only on the cost, but on the benefit-cost analysis using those cost estimates, used to show that Tranche 2.1, region by region, is economically sound. Cost increase has become a regulatory issue for one of the Tranche 1 projects, where MISO is requiring a “Variability Analysis” for project due to sharp increases in project cost. Another project, the Huntley-Wilmarth line, required a “Variability Analysis” due to delays in construction. As a

¹¹ Application, Appendix E.2, the MTEP24 Series 1A Futures Report, Series 1A, Published November 1, 2023.

result of the economic conditions since 2025, it's likely that a "Variability Analysis" is due for all Tranche 2.1 projects, and quite possibly Tranche 1 as well.

The cost of the Gopher to Badger line, in Minnesota only, is estimated at \$979 million to \$1.373 billion, and this was estimated for the Application using what year dollars? The MISO cost estimate, for the full "project 26,"² from North Rochester extending to Columbia, is \$1.924 billion in 2024 dollars. In Minnesota, the project is two sections totaling approximately 140 miles, and in Wisconsin from the River to the Columbia substation, roughly 110 miles. Looking at a cost ratio of 14:11 and doing simple math, it is likely costs have increased when the two sections are put together. How much of an increase?

What is the cost estimate in 2026 dollars of the roughly 140 miles of the Minnesota portion, and the 2026 cost estimate from the River to Bell Creek and from Bell Creek to Columbia, the roughly 110 mile remainder of project 26? This project may have cost increases sufficient to trigger a MISO Tariff FF variance analysis. MISO's "approval" of the project is dependent on the cost-benefit ratio, therefore the cost estimate. The Commission needs an updated cost estimate and updated cost/benefit analysis. MISO likely must complete a variance analysis for this project and reconsider ... should this project be approved?

E. MISO CLAIMS TIMELY REVIEW WILL FACILITATE FLOW OF BENEFITS TO MINNESOTA.

Benefits are also an issue of fact as benefits claimed in MISO's cost-benefit analysis are difficult to attribute to a particular project – MISO presents them only for the entire Tranche 2.1

² MISO Tranche 2.1 in southern Minnesota are broken into segments, and it's impossible to determine costs. This "Project" is broken into Segment 1 and 2 in Minnesota at about 140 miles, and in Wisconsin, from the Mississippi River to Bell Center to Columbia, another roughly 110 miles. To the West, Commission dockets CN-25-117 also contains consolidated CN-25-118, CN-25-119, and CN-25-120, which the MISO projects includes segments in South Dakota and Iowa. The costs of each of these segments needs to be clarified and compared with the Tranche 2.1 cost estimates in 2024 dollars.

portfolio of projects.³

Benefits accrue to members of MISO, not the ratepayers or public. Will benefits claimed benefit “Minnesota” or utilities in Minnesota? What is the “timely review” that MISO seeks? When considered with an in-service date estimated for the end of 2034, why is there more of a hurry for permitting review for this project than, for example, the Maple River-Cuyuna project⁴ with an in-service date of 2031-2033, where Applicants and MISO support waiting for the Route Permit Application to facilitate joint review?

This application for this Gopher to Badger transmission project, and each of the MISO Tranche 2.1 projects in Minnesota, are deserving of thorough independent review of need.

II. “JOINT COMMENTERS” MIRROR MISO SUPPORT FOR USE OF “INFORMAL PROCESS,” AND ALSO STATE THAT THEY HAVE NOT IDENTIFIED ANY CONTESTED ISSUES FOR REFERRAL FOR CONTESTED CASE.

The only two issues raised by “Joint Commenters” in their initial comments are also that there are no contested issues of fact and that the “Commission’s informal process” should be used. For a project of this environmental and economic magnitude, part of the first 765kV transmission that will cross the entire state of Minnesota, the “Joint Commenters” as environmental, energy, and economic advocacy organizations, offer little showing of concern of environmental and economic issues.

A. JOINT COMMENTERS STATE THERE ARE NO CONTESTED ISSUES OF FACT.

In the initial round of comments, no comments have come before. How would Joint Commenters know if there are contested issues of fact, and whether there are issues of fact likely to be raised at this time? This argument is premature.

³ MTEP24, Benefits, p. 161- 163

⁴ Maple River – Cuyuna Transmission Project, MISO 20, PUC Docket CN-25-109.

Joint Commenters also state that the “informal process” will provide opportunity to sufficiently inform the record. Without a contested case, without intervention, which includes submission of Information Requests, how will the missing necessary information be obtained?

B. WHAT IS THIS “INFORMAL PROCESS” REFERRED TO IN THE COMMENTS?

Joint Commenters, like MISO, claim that the Commission’s informal process should be used to review this Certificate of Need application. The final substantive paragraph, arguing for “informal process” of just Initial and Reply comments is a non-sensical wholesale dismissal of the public’s reasonable expectation of participation available in a Contested Case:

Given the amount of public engagement already generated by the proposed project, we believe utilizing the informal process is appropriate, as it **would allow the Joint Commenters and the public to more fully and effectively participate in Commission proceedings.**

Comment, p. 2 (emphasis added).

Given the Office of Legislative Auditor’s Report on **Public Utilities Commission’s Public Participation Process**,⁵ the public should be encouraged, not limited. How would an “informal process” allow the public to more fully and effectively participate? How is an “informal process” consistent with the Commission’s public participation mandate? Minn. Stat. §216I.16, Subd. 1.

C. THE 765kV TRANSMISSION PROJECT IS LIKELY TO HAVE EXTREME ENVIRONMENTAL IMPACTS

The environmental, energy, and economic advocacy organizations making up the “Joint Commenters” oddly do not show concern about the likely impacts of this first in Minnesota 765kV line heading 140 miles to the southeast across the fields and forests of southern

⁵ Office of Legislative Auditor’s **Public Utilities Commission’s Public Participation Process**
<https://www.auditor.leg.state.mn.us/ped/pedrep/puc2020.pdf>

Minnesota; through the Richard J. Dorer Memorial Hardwood Forest;⁶ extensive karst features;⁷ the Rochester Plateau and Blufflands;⁸ the Driftless⁹ region; over the protected Zumbro River¹⁰ and over the Mississippi River,¹¹ over the Mississippi River’s Upper Mississippi Fish and Wildlife Refuge, one of the most important flyways stopovers in North America, for example every season hosting tens of thousands of swans as they migrate; calcareous fens; Reno Bottoms Habitat Rehabilitation and Enhancement Project;¹² an area of DNR designated Wild Rice Water¹³; the Genoa National Fish Hatchery;¹⁴ the Great River Road,¹⁵ and on through Wisconsin to the Columbia substation.

D. THIS 765kV TRANSMISSION PROJECT IS LIKELY TO HAVE EXTENSIVE ECONOMIC IMPACTS

The “Joint Commenters” claim to be ratepayer advocates. The Gopher-Badger section of MISO’s Tranche 2.1 project 20 is bound to have extensive economic impacts. As above, the project in Minnesota is estimated to cost from \$979 million to \$1.373 billion, and estimated using likely 2024 dollars. The MISO cost estimate, for the full “project 26,”¹⁶ from North Rochester extending to Columbia, has a cost estimate of \$1.924 billion, and Tranche 2.1 is estimated at nearly \$22 billion, all in 2024 dollars.

⁶ https://www.dnr.state.mn.us/state_forests/forest.html?id=sft00033#homepage

⁷ https://mnatlas.org/gis-tool/?id=k_0555

⁸ <https://www.dnr.state.mn.us/woodlands/rochester-blufflands.html>

⁹ <https://eaglebluffmn.org/driftless/>

¹⁰ <https://www.dnr.state.mn.us/watertrails/zumbroriver/index.html>

¹¹ <https://www.fws.gov/refuge/upper-mississippi-river/map>

¹² <https://www.mvr.usace.army.mil/Missions/Environmental-Stewardship/Upper-Mississippi-River-Restoration/Habitat-Restoration/St-Paul-District/Reno-Bottoms/>

¹³ <https://mnatlas.org/resources/wild-rice-mn-dnr/>

¹⁴ <https://www.fws.gov/rivers/fish-hatchery/genoa/visit-us/locations/genoa-national-fish-hatchery>

¹⁵ <https://www.dot.state.mn.us/scenicbyways/great-river-road.html>

¹⁶ MISO Tranche 2.1 projects in southern Minnesota are broken into segments, and it’s impossible to determine individual costs. This “Gopher to Badger” project is broken into Segment 1 and 2 in Minnesota at about 140 miles, and in Wisconsin, from the Mississippi River to Bell Center to Columbia, another roughly 110 miles. To the West, Commission dockets CN-25-117 also contains consolidated CN-25-118, CN-25-119, and CN-25-120, which the MISO projects include segments in South Dakota and Iowa. The costs of each of these segments needs to be clarified and compared with the Tranche 2.1 cost estimates in 2023-2024 dollars.

MISO's Schedule 26A¹⁷ lists the apportionment for Tranche 2.1, and the amount the "Local Balancing Authorities" will be assessed, and how that will be passed on to ratepayers in Minnesota. The "Joint Commenters" should be advocating for full disclosure of impacts to ratepayers.

III. THE DEPARTMENT OF COMMERCE RECOMMENDS THE APPLICANTS PROVIDE ADDITIONAL INFORMATION

Commerce DER found the application "substantially complete," and has recommended that there is no need for a referral to the Court of Administrative Hearings and suggested additional information be provided, with a detailed list of requests.

A. COMMERCE-DER SEES NO CONTESTED OR PROCEDURAL ISSUES

The Department of Commerce encouragingly notes the Commission exercise its authority:

Even though the project was first proposed at the regional level, reviewing the Applicant's petition through the CN process gives the Commission the opportunity to weigh in on behalf of the Minnesota's ratepayers. It is essential that the Commission and other state agencies have the authority to advocate for Minnesota's ratepayers.

DER Commerce, Comments, p. 1.

However, DER Commerce states, like MISO and the "Joint Intervenors," a claim that:

The Department is not aware of any contested issues or procedural concerns that would merit referring the petition to the Court of Administrative Hearings for contested case proceedings at this time.

DER Commerce, Comments, p. 3.

Once again, such a statement is premature at this point in time in this process.

B. COMMERCE DER HAS REQUESTED MUCH ADDITIONAL INFORMATION BE PROVIDED BY APPLICANTS DESPITE A DECLARATION THAT THE APPLICATION IS SUBSTANTIALLY

¹⁷ Parked on Legalelectric: https://legalelectric.org/f/2026/02/Schedule-26A-Indicative-Annual-Charges106365_posted-9-30-2025.xlsx

COMPLETE.

Commerce DER has a number of good questions and requests for more information. Comment, pps. 3-8. Though not all inclusive, the information requested would be helpful. The information requested should be provided before the Commission makes any finding that the application is complete.

C. COMMERCE EIP HAD LITTLE TO SAY

Commerce Energy Infrastructure Permitting had very little to say other than the environmental information in the application is substantially complete. There were no EIP comments about whether there were contested issues of fact or what review process should be used.

EIP also argued logically that due to a recent change in law, some of the language and process was unworkable and that a variance was consistent with the intent of the law. The legislature did direct the Commission to embark on rulemaking, which is long overdue.¹⁸ It's time the Commission do the legislatively mandated work and update the rules.

IV. COMMENTS OF LOCAL GOVERNMENTS

Houston County, Viola Township, and Zumbro Township have filed comments in this docket, opposing the project, requesting more information, and/or requesting environmental information and an Environmental Impact Statement. Although the Commission has sole jurisdiction over need certification and routing of lines, the Commission must take into account local governments positions, because if permitted, the line will traverse and impact these communities.

A. HOUSTON COUNTY HAS PASSED A DETAILED RESOLUTION OPPOSING THE PROJECT AND REQUESTING ADDITIONAL INFORMATION

¹⁸ See PUC's 7849 and 7850 Rulemaking Docket R-12-1246.

Houston County heard from many residents about this Gopher to Badger transmission project, and has filed its Resolution 26-08 with the Commission as its Initial Comment.¹⁹ The County has four priorities it exercises in its Land Use Plan:

- Agricultural land preservation
- Scenic and environmental protection
- Sustainable tourism development
- Protection of rural character

Houston County Cover letter and Resolution No. 26-08.

In its Resolution, Houston County has process requests and information requests. The County's process requests are:

1. A full Environmental Impact Statement (EIS) and mitigation plan with local review that includes Houston County-specific agricultural, karst, groundwater, wildlife, scenic, tourism, and property value analyses.
2. Detailed modeling of EMF, audible noise, and corona discharge at residential setbacks.
3. Independent Agricultural Impact Assessment specific to Blufflands soils and topography.
4. Full disclosure of anticipated right-of-way acquisition impacts within the County.
5. Early sharing of the Route Permit Application prior to formal filing.

Resolution 26-08, p. 3.

The information the County requests, on or before April 30, 2026:

1. A breakdown of cost allocation by state and rate class.
2. Documentation of Minnesota residential rate impacts resulting from this project projected over 1, 10, and 20 years.
3. A list of specific quantified economic benefits projected for Houston County.
4. Detailed alternative route analysis considered for Houston County.
5. Documentation of distributed energy resource assumptions used in load forecasts (Years 1, 10, and 20).
6. A list of prior combined 765 kV / 161 kV double-circuit installations constructed by the Applicants.
7. Detailed site criteria and footprint for the proposed Houston County switching station.
8. Road use agreements, construction practices, and infrastructure protection commitments to minimize risk and damages.
9. A clear explanation of eminent domain authority and compensation standards.

Resolution 26-08, p. 3.

¹⁹ Filed in eDockets February 24, 2026 [20262-228539-01](#).

As a good neighbor, the Applicants should quickly share the requested information with the County, and as a regulator, the Commission should encourage County participation in both the Certificate of Need and Routing dockets.

B. ZUMBRO TOWNSHIP REQUESTS CONSIDERATION AND AVOIDANCE OF IMPACTS TO ITS NATURAL ENVIRONMENT.

Zumbro Township has filed an Initial Comment²⁰ with the Commission with three primary concerns:

- Prioritizing use of existing infrastructure corridors to avoid impact to natural environments and farmland.
- Protection of the Richard J. Dorer Memorial Hardwood State Forest by avoiding routing through forested land.
- Protection of the Zumbro River, designated as a State Water Trail, by minimizing impacts to land use, and to aesthetic, visual, wildlife habitat, and aquatic resources.

Zumbro Township's interest in preserving the township's environmental and agricultural resources should be carefully considered by the Commission.

C. VIOLA TOWNSHIP FILED ITS RESOLUTION URGING COMPLIANCE WITH MERA AND AVOIDANCE OF CUMULATIVE IMPACTS OF TRANSMISSION IN AGRICULTURAL AREAS

Viola Township passed a resolution²¹ focused on protection of its farmland, thus protection of the township's economy, character, and long-term viability. In essence, Viola Townships requests Commission thorough and thoughtful review:

²⁰ Zumbro Township comment, filed in eDockets February 10, 2026, [20262-227995-03](#).

²¹ Viola Township comment, filed in eDockets February 26, 2026 [20262-228696-01](#).

The cumulative siting of transmission lines, large-scale solar, and wind infrastructure within a concentrated rural agricultural area raises serious concerns regarding equitable burden, long-term land-use sustainability, and compliance with both Minnesota agricultural policy and MERA's substantive protections.

Viola Township supports responsible energy development. However, responsible development must: 1) demonstrably avoid prime agricultural soils wherever feasible, 2) fully evaluate less disruptive routing alternatives, 3) comply with Minnesota's agricultural preservation policy and 4) satisfy MERA's high standard requiring no feasible and prudent alternative.

22

Viola Township is seeking protection of agricultural land and adherence to Minnesota law prioritizing preservation.

V. DALE THOMFORDE HAS OFFERED FEASIBLE AND PRUDENT SYSTEM ALTERNATIVES

The Comments of Dale Thomforde in this docket and the western segments of this 765kV project offer reasonable, feasible, and prudent system alternatives.

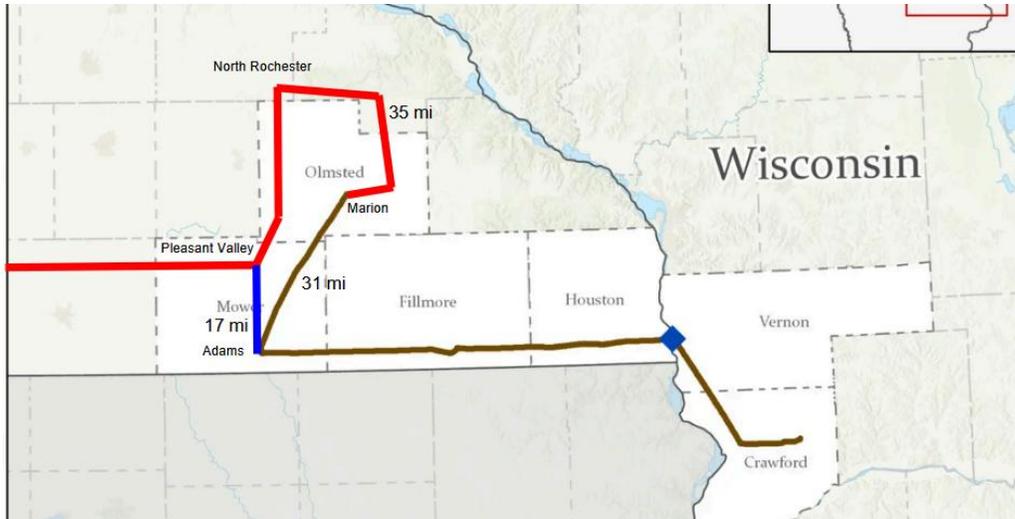
Very early on, just after the November 24, 2025²³ open house held by Applicants, Thomforde suggested, based on the connections, start, and end points, of the 765kV projects, that the 765kV circuit run directly from Pleasant Valley to Adams, skipping the expense of the distance to and from and expansion of the North Rochester and Marion substations. The proposal would cut the distance, by Thomforde's estimate 71 miles, and likely eliminate the need for the additional substations, cutting costs significantly.

Thomforde later submitted a comment²⁴ with an estimate of cost savings of his system alternative proposal at potentially \$392 million, and would also reduce impacts to landowners, residences, and the environment. From that comment, his proposal mapped out:

²² Id.

²³ Thomforde Comment, filed November 24, 2025 [202511-225223-01](#).

²⁴ Thomforde Comment, filed January 15, 2026 [20261-226957-01](#).



Thomforde’s system alternatives should be considered by the Commission.

VI. KYLE JOHNSON SUBMITTED A COMMENT WITH EXTENSIVE INFORMATION SUPPORTING DIRECT CURRENT AND DC UNDERGROUND AS A FEASIBLE AND PRUDENT ALTERNATIVE.

Kyle Johnson filed detailed comments showing the technical and regulatory changes that make direct current, underground, a feasible and prudent system alternative that the Commission should evaluate. In his comments of January 23, 2026,²⁵ he showed that the Applicants dismissed DC underground by “evaluating” an expensive 640DC “alternative” that was doomed to be unworkable and ignored the 525kV DC industry standard that has been gaining traction in the U.S. He also found that the utilities’ use of “burying a 765kV AC line” was a false alternative because burying such a high voltage AC line is not standard practice.

As system alternatives, Johnson proposed DC underground noting the high efficiency of DC transmission with associated decrease in line loss and corona discharge, lower magnetic fields, smaller right of way requirements, better suited to voltage volatility of renewable generation, a reduction in public opposition, and encouraged in Minnesota through legislation

²⁵ Kyle Johnson, Comment January 23, 2026 [20262-228473-01](#)

providing for use of highway and rail right of ways.

DC lines are becoming more frequent in the U.S. and worldwide, particularly as technology changes.²⁶ The SOO Green line was permitted in Iowa in the first of a kind sharing of railway right-of-way, and the SOO Green initially had an alternative route along railroad right-of-way in southeast Minnesota. Substation/Converter station technology has changed and the cost has dropped, and are essentially the same as a 765kV AC substation.²⁷

Benefits of DC's reduced line losses are ratepayer savings in both line loss and decreased need for replacement power with new generation and the cost of series compensation stations along the route. The avoided generation costs touted in MISO's cost-benefit chart would be greater with use of DC transmission.

In sum, Applicants' rejection of DC was based on flawed evaluation:

1. Oversizing of DC alternative to 600/640kV DC
2. Lack of consideration and quantification of environmental costs
3. Overestimation of DC/AC converter technology
4. Costs of 765 kV transformer facilities are not considered by applicant when compared to DC converters
5. Savings by DC efficiency and significant line loss in AC option
6. Costs of land acquisition and right of way expansion
7. Vulnerability of aboveground 765 kV to weather and external damage
8. Decreased resiliency of grid by consolidating a large percent of GW transmission into one line rather than a distributed grid

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Johnson points out that DC underground would provide significant benefits for an underground crossing of the protected Mississippi River, a crossing not necessarily feasible with such a large high voltage overhead transmission line:

²⁶ Id., p. 6.

²⁷ Id., p. 7.

²⁸ Id., p. 10.

Feature	765 kV AC (Above Ground)	525 kV HVDC (Underground)
Bird Collision Risk	High; involves multiple wire levels and shield wires	Zero; all infrastructure is below grade
Noise Impact	Audible corona hum/crackling	Silent
ROW Width	Massive (250 feet)	Compact (approx. 20% of AC width) Does not require expansion
Weather Resilience	Vulnerable to wind, ice, and storms	Highly Resilient
EMF Exposure	Large, fluctuating electromagnetic fields extending well beyond the ROW.	Static magnetic fields (like the Earth's) contained by shielding and burial depth.
Visual Blight	Towers will exceed 150-199 feet, impacting property values and landscapes.	Invisible

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Johnson argues for an accurate assessment of 525kV DC, and an accurate comparison of the cost and feasibility of underground, and that without it, the project Application is not complete.

VII. DR. JOHNSON’S NOISE COMMENTS REFLECT APPLICANTS’ ACKNOWLEDGEMENT OF NOISE OF 765Kv LINES

In his Comments, W. Ben Johnson makes a deep dive into noise issues in light of the Minnesota noise standards.³⁰ Noise has an undeniable impact on human health, a dangerous impact. The Commission doesn't have a complete understanding of noise, evidenced by the Bent Tree settlements, and must address the impacts of noise for the application to be complete.³¹

The Applicants acknowledge that noise is an issue with large transmission lines – a search of the application shows 71 instances where “noise” is found in the Application narrative.

Applicants have listed noise as the first factor when discussing structure heights and proposed right-of-way:

Audible noise compliance and reduced conductor sags and conductor blowout were most impactful to the selection to help minimize structure heights and maximize use of the proposed right-of-way.

²⁹ Id., p. 12.

³⁰ Minn. R. 7030.0040.

³¹ See Bent Tree Wind Project noise settlements and landowner buyouts, PUC Docket WS-08-573. Commission Order online at https://legalelectric.org/f/2018/06/18-05908-573-DW_ORDER.pdf

Application, p. 25. Noise was the factor eliminating one of the conductor configurations for Segment 1:

The Applicants initially studied both four-conductor bundle and six-conductor bundle conductor configurations. However, the four-conductor bundle configuration was immediately determined to not to be an acceptable option due to its higher noise profile.

Application, p. 145.

Due to the propensity of noise associated with transmission, particularly 765kV lines, the applicants' awareness of noise and minimization of noise as a design objective, the Commission should take noise of transmission seriously and make noise minimization and strict adherence to noise standards a condition of permitting.

VIII. CONCLUSION

The comments of MISO, Joint Commenters, and Commerce that state that the application is complete, that there are no contested issues of fact, and which recommend the non-existent "Commission informal process" for the first of its kind 765kV transmission line across southern Minnesota and crossing the Mississippi River into Wisconsin have no basis in fact and are without merit.

Multiple comments, even those of Commerce-DER, have pointed out information that should be provided by Applicants, and issues of fact have been raised by other commenters in this docket and in the connected "Power on Minnesota" docket. A contested case and intervention is necessary to give intervenors the opportunity to submit Information Requests to obtain the missing information and then enter that information into the record.

Should the Commission find the Application complete, the Certificate of Need should be stayed until the Route application is filed, a full Environmental Impact Statement Ordered, the CoN and Route Applications referred to the Court of Administrative Hearings for a Contested

Case, and the dockets move forward in a joint proceeding as directed by statute. Minn. Stat. §216B.243, Subd. 4.

Thank you for the opportunity to file these Reply Comments in the Gopher to Badger transmission line docket.



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