March 9, 2026

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

RE: IN THE MATTER OF THE APPLICATION FOR A CERTIFICATE OF NEED FOR THE GOPHER TO BADGER LINK 765 KV HIGH VOLTAGE TRANSMISSION LINE PROJECT (LRTP 26)
DOCKET NO. ET3, E002/CN-25-121

Dear Ms. Bergman:

Northern States Power Company, doing business as Xcel Energy, and Dairyland Power Cooperative respectfully submit the enclosed Supplemental Comments to the Minnesota Public Utilities Commission regarding the above-captioned docket.

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

Sincerely,

/s/ Jody Londo

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

/s/ Kathleen Galioto

Kathleen Galioto
VP/Deputy General Counsel
Dairyland Power Cooperative

STATE OF MINNESOTA
BEFORE THE
PUBLIC UTILITIES COMMISSION

Katie Sieben	Chair
Joseph K. Sullivan	Vice-Chair
Audrey Partridge	Commissioner
Hwikwon Ham	Commissioner
John Tuma	Commissioner

In the Matter of the Application for a Certificate of Need for the Gopher to Badger Link 765 kV High Voltage Transmission Line Project (LRTP 26)	Docket No. ET3, E002/CN-25-121 **APPLICANTS' SUPPLEMENTAL COMMENTS**

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, and Dairyland Power Cooperative (Dairyland) (together, Applicants), respectfully submit these Supplemental Comments in accordance with the Notice of Comment Period on Application Completeness (Notice) issued by the Minnesota Public Utilities Commission (Commission). These Supplemental Comments respond to comments submitted during the reply comment period, to the extent those comments raise issues not previously addressed in the Applicants' March 4, 2026, Reply Comments. The Applicants also respond to the comments submitted by the City of Spring Grove and U.S. Fish and Wildlife Service (USFWS) on March 5, 2026.

Because the Certificate of Need Application (Application) submitted by the Applicants for the Gopher to Badger Link 765 kilovolt (kV) Transmission Line Project (Project) contains the information required by Minnesota law, Applicants respectfully request that the Commission determine that the Application is complete. The Applicants further request that the Commission stay the Application and process it jointly with the Route Permit Application, which Applicants intend to submit this fall.

SUPPLEMENTAL COMMENTS

I. Comments Regarding Process

Commenters requested that the Commission hold joint Certificate of Need and Route Permit proceedings and/or require a contested case proceeding.[1] As detailed in Reply Comments, Applicants agree that joint proceedings would be feasible, efficient, and in the public interest for this Project because Applicants anticipate filing the Route Permit Application in Fall 2026. Because the Certificate of Need proceeding would be stayed until that time, the Applicants continue to request that the Commission defer a decision on the process to be used for the Certificate of Need until the Route Permit Application is filed.

II. Comments Regarding Merits of Certificate of Need and/or Route Permit

Most comments submitted during the reply comment period relate to the merits of the Project (Certificate of Need and Route Permit), rather than completeness. Comments discussed the need for the Project, system alternatives, routing issues, and potential human and environmental impacts.[2] The Applicants anticipate that these issues will be fully vetted during the permitting process, which will include the preparation of an environmental impact statement (EIS) and evaluation of system and route alternatives.

For example, Dale Thomforde submitted multiple comments proposing system alternatives that would include changing the endpoint of the Gopher to Badger Link Project from North Rochester to Pleasant Valley; and/or eliminating the proposed 765 kV line between Pleasant

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[1] *See, e.g.,* D. Thomforde Comments, eDockets No. 20262-228756-01 (Feb. 27, 2026); A. Ninneman Comments, eDockets No. 20263-228935-01 (Mar. 4, 2026).

[2] *See, e.g.,* Public Comments (Pederson) at 2, eDockets No. 20262-228710-02 (Feb. 26, 2026); D. Wray Comments, eDockets No. 20263-228933-01 (Mar. 4, 2026).

Valley and North Rochester. Analysis of system alternatives is an important part of the Certificate of Need process. The Commission's rules identify the types of system alternatives that must be analyzed in the Application, and the Application complies with those rules.[3] Additional system alternatives may be proposed during the process but are not required for an application to be determined complete. The Applicants are committed to carefully evaluating system alternatives proposed during scoping.

III. U.S. Fish and Wildlife Service

In its comments, USFWS discusses coordination related to protected species, route alternatives, and avoidance and minimization measures. The Applicants appreciate USFWS's comments and are committed to working with USFWS as Project routing continues to avoid and minimize potential Project impacts.

IV. City of Spring Grove

The City of Spring Grove submitted comments and a resolution on March 5, 2026, requesting that the Commission temporarily suspend proceedings to allow for additional gathering of information and public engagement. The Applicants appreciate the City's participation in this process and encourage the City to continue to engage in the Commission's permitting process. With respect to local and public engagement, the Applicants have held open houses in the Project area, and residents and local governments have been invited to attend those open houses. The Applicants also met with members of the Spring Grove City Council and staff on March 5, 2026, to share information about the Project. The Applicants will hold additional open houses this spring, prior to filing a Route Permit Application this fall. The combined Certificate of Need and Route Permit proceedings will, likewise, include multiple opportunities for additional

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

participation, as well as the preparation of an EIS to study route alternatives and potential human and environmental impacts. The Applicants anticipate that the forthcoming permitting proceedings will analyze the topics and resources identified in the City's comments.

V. Legalectric Groups

The Legalectric Groups provide reply comments that, like other comments submitted by members of the public during the reply comment period, generally relate to the merits of the Certificate of Need and/or Route Permit. The underlying merits of the Project will be developed during the forthcoming proceedings and, because the Applicants have requested joint proceedings, the Commission should defer a decision on the process to be used for the Certificate of Need until the Route Permit Application is filed. Doing so will allow the Commission to efficiently combine proceedings and minimize public confusion.

The Legalectric Groups largely do not discuss the completeness of the Application except for asserting that "[t]he information requested [by DOC-DER] should be provided before the Commission makes any finding that the application is complete."[4] The Legalectric Groups do not point to any application content requirements and otherwise provide no legal support for this assertion.

CONCLUSION

Applicants respectfully request that the Commission determine that Application to be complete. Because of the Applicants' request to stay the Application until Fall 2026, the Applicants further request that the Commission defer a decision on the process for considering the Application until after the Route Permit Application is filed to ensure consistent proceedings and reduce public confusion.

[4] Legalectric Groups Reply Comments at 9, eDockets 20262-228767-01 (Feb. 27, 2026).

Dated: March 9, 2026

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