COMMERCE DEPARTMENT

February 25, 2026

Sasha Bergman
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: Comments of the Minnesota Department of Commerce
Docket No. ET3, E002/CN-25-121

Dear Ms. Bergman:

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

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

The petition was filed by Northern States Power Company doing business as Xcel Energy (Xcel) and Dairyland Power Cooperative (Dairyland) (collectively, Applicants) on February 6, 2026.

The Department recommends **the petition be declared substantially complete** and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Dr. SYDNIE LIEB
Assistant Commissioner of Regulatory Analysis

RP/DZ
Attachment

COMMERCE DEPARTMENT

Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

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

I. INTRODUCTION

Northern States Power, doing business as Xcel Energy (Xcel), and Dairyland Power Cooperative (Dairyland) (collectively, Applicants) filed a joint application to the Minnesota Public Utilities Commission (Commission) for approval of Applicant's *Certificate of Need Application* (CN or petition) for the Gopher to Badger Link 765 kilovolt (kV) transmission project (project). The proposed project has an in-service date of 2034. A map of the project is included as Attachment 2.

The project is comprised of two segments:

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

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

MISO and the Applicants have identified the need for up to 10,000 additional megawatts of electrical transmission capacity in Minnesota.[1] The transmission capacity is needed to address reliability overloads and support compliance with national electric reliability standards, meet current and future state and regional reliability, provide transmission capacity for long-term load growth, and support the energy transition.

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

II. PROCEDURAL BACKGROUND

[1] *In the Matter of the Application for a Certificate of Need for the Gopher to Badger Link 765 kV High Voltage Transmission Line Project,* Xcel Energy and Dairyland Power Cooperative, Gopher to Badger Link Certificate of Need Application, February 6, 2026, Docket No. ET3, E002/CN-25-121, (eDockets) 20262-227902-02 (hereinafter "Initial Petition") at 2.

February 10, 2025	The Applicants filed a Notice of Intent to Construct, Own, and Maintain the proposed project.[2]
October 8, 2025	The Applicants filed their Exemption petition[3] from certain content requirements for a CN application, pursuant to Minnesota Rules 7849.0200, subp. 6.[4]
October 8, 2025	The Applicants filed a Notice Plan petition, providing a plan to notify potentially affected members of the public about the proposed project.[5]
December 23, 2025	The Commission ordered the approval of the Applicants' exemption petition with modifications and notice plan petition.[6]
January 30, 2026	The Applicants filed the petition requesting approval of a CN for the proposed project.[7]
February 9, 2026	The Commission issued a notice of comment period on the completeness of the petition.[8]

Topics open for comment:

- Does the Certificate of Need application contain the information required by Minnesota Rule chapter 7849.0220, Subp. 2?
- Are there any contested issues of fact with respect to the representations made in the application?
- Should the application be evaluated using the Commission's informal process or referred to the Court of Administrative Hearings for contested case proceedings?
- Are there other issues or concerns related to this matter?

III. DEPARTMENT ANALYSIS

A. COMPLETENESS REVIEW

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

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

[4] Minn. R. 7849.0200 subp. 6.

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

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

[7] Initial Petition.

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

The first notice topic is "Does the Certificate of Need petition contains the information required by Minnesota Rule chapter 7849.0220, Subp. 2?"

Minnesota Rules 7849.0220, Subp. 2, states that each CN petition for large high voltage transmission lines (LHVTL) "shall include all of the information required by parts 7849.0240 and 7849.0260 to 7849.0340." However, Minnesota Rules 7849.0200, Subp. 6, allows for exemptions from any of the content requirements of CN petitions if the applicant demonstrates that the requirement is not necessary for determining whether the facility is needed. As noted in the Exemption Order, the Commission approved the Applicants' Exemption petition with modifications.

The Department reviewed the petition for completeness considering the rule requirements and the Exemption Order. Attached is a table that summarizes the Department's completeness review of the official filing of the project petition to the Commission. The table indicates what data and information is required by Minnesota Rules, the location of that data and information in the petition, the location of alternative data if the Applicant was granted an exemption to the applicable Minnesota Rule, and whether the petition contained the relevant data and information.

The Department finds that the Applicants' petition is substantially complete. This finding only addresses completeness, an administrative determination of the information provided.

B. CONTESTED ISSUES OF FACT

The second notice topic asks if there are any "contested issues of fact with respect to the representations made in the petition?"

The Department is not aware of any contested issues of fact in this proceeding as it relates to the Department's CN analysis.

C. INFORMAL PROCESS OR CONTESTED CASE

The third notice topic is "Should the application be evaluated using the Commission's informal process or referred to the Court of Administrative Hearings for contested case proceedings?"

Contested cases are generally recommended when there are contested issues of fact, procedural concerns, or other significant unresolved issues for an Administrative Law Judge to address. 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.

D. OTHER ISSUES

The fourth notice topic is "Are there other issues or concerns related to this matter?"

In reviewing the petition for completeness, the Department found items that may be lacking in context, explanation, or alternate information. The Department identifies the following Minnesota

Rules and corresponding sections of the petition and requests that the Applicant includes the following additional information:

- Completeness Checklist (Appendix A):

    1. The Department recommends that Applicants ensure that the completeness checklist matches the location of the information or data in the petition. This allows for more efficient review by the Department, and better information for the public. Please review the Department's Attachment 1 for instances where section numbering may not match up with content.

- Minn. R. 7849.0260 item A(2):

    1. The Applicants state that the project will use different conductors for different segments. Segment 1 will feature a six-conductor bundle of 1192.5 thousand circular mil (kcmil) 45/7 aluminum conductor steel reinforced (ACSR) Bunting conductor, while the Segment 2 will use a six-conductor bundle of 795 kcmil 30/19 ACSR Mallard conductor for the double-circuit 765 kV circuit and two-conductor bundles of 795 kcmil 30/19 ACSR Mallard conductors for the 161 kV circuit.

    2. The petition states that "Xcel Energy identified the 1192.5 45/7 Bunting as appropriate for the project based on a study of 17 conductors."[9] The Department would appreciate a review of costs and benefits to ratepayers from enabling more transmission capacity from advanced conductor technologies, beyond ACSR. This could include how various additional transmission components, such as line sag, temperature, and weather conditions, affect transmission line output.

    3. The Department recommends supplying additional information on how the Applicants decided to use these ACSR conductors, and whether any advanced conductors were included in that study, in Applicant's reply comments.

- Minn. R. 7849.0260 item A(6):

[9] Petition at 25.

1. The affected counties are mentioned several times throughout the petition, but a simple table listing the affected counties would be helpful.

- Minn. R. 7849.0260(B)(3):

    1. The petition lists the transmission lines studied as the 765 kV voltage. The Applicants, however, could elaborate further on different types of conductors. The Department recommends that Applicants discuss how they decided on conductor arrays, type and size. The Department also recommends discussing other types and technologies for conductors, such as advanced conductors.

- Minn. R. 7849.0260 item (B)(5):

    1. The 765 kV high voltage transmission lines are proposed as single-circuit, due to reliability contingencies that emerge when 765 kV lines are double-circuited. However, the 161 kV portion of Segment 2 will be double-circuited.

       The Department recommends Applicants clarify that "double-circuit" modifies the 161 kV, not the 765 kV portion of the line in future filings. For clarity, the Department recommends that the petition read "single circuit 765 kV/double circuit 161 kV HVTL."

- Minn. R. 7849.0260 item C(1):

    1. The project cost estimates are proposed to be between $979 million (low-range) to $1.273 billion (high-range). The Department recommends that Applicants add more details of how the project components cost estimates were calculated and what portion is related to risk reserves.

    2. The Department likewise recommends Applicants provide more details on project cost assumptions and how they are affected with section 232 tariffs for steel, copper and aluminum, in addition to any other potential cost drivers.

    3. What changes, if any, do Applicants envision to cost estimates, following the Supreme Court's decision declaring the International Emergency Economic Powers Act (IEEPA) tariffs unconstitutional?

4. The Department recommends providing additional information as to how the proposed project's cost estimates with risk reserves relate to the LRTP and Multi-Value Project (MVP) variance analysis process.

- Minn. R. 7849.0260(C)(4):

1. The Applicants estimate that the annual costs of operations and maintenance for the proposed project will be $3,200 - $4,500 per mile. For Segment 1 of the proposed project, which totals 34 miles, the annual O&M costs would be an estimated $108,00 - $153,000. The 105-mile stretch comprising Segment 2 would cost an estimated $336,000 - $472,500 per year.

   Based on these costs for O&M expenses, the Department recommends that Applicants provide more details of the assumptions underpinning these O&M cost estimates. For example, do the cost estimates feature an escalator to account for inflation? It is likely that costs near the end of the useful lifespan of the proposed project will require more maintenance than in early years. The Department recommends Applicants provide their cost escalator, if used.

- Minn. R. 7849.0270(6)(A):

1. Applicants provided a discussion of load forecasts, and the extent to which the Applicant coordinates its load forecasts with those of other systems. Applicants discussed the MISO Transmission Expansion Plan 2024 (MTEP24) process in Chapter 5 and Appendix F, respectively.

   The petition should provide additional details about how involved they were in planning assumptions in MTEP and Futures planning. For example, what data did Applicants provide to MISO beyond integrated resource plan data and state policy language, if any? How much did MISO consult Dairyland and Xcel as transmission owners (TOs), versus consulting with TOs across the MISO North region?

- Minn R. 7849.0270(2)(E):

1. Appendix D of the Applicant's petition features a list of Xcel's revenue requirements. On pg. 2, Xcel lists its all-in project revenue requirement as $1.518 billion, with a net cost to MN jurisdiction as

$1.112 billion.[10] However, on page 9 of Appendix D, the Applicants then list that the all-in project revenue requirement is $1.971 billion, with a net cost to the MN jurisdiction as $1.444 billion.[11] The Department recommends the Applicants provide their derivations of these numbers.

2. The Department recommends that Applicants provide more details and calculations for coming to these numbers in Appendix D, including how the different dollar amounts for 'Total Project Costs' relate to each other. Applicants should also explain how these numbers relate to the overall costs of the project as reported in Section 2.5 of the initial petition?[12]

- Minn R. 7849.0330(F):

1. In Section 2.7, Applicants discuss the workforce requirements for construction of the proposed project, estimating that more than 800 personnel may be needed to construct the proposed project.

   The Department recommends that the Applicants discuss whether southeastern Minnesota currently has the workforce capable of providing 800 personnel with sufficient experience and training to construct this project. If the workforce is not sufficient, Applicants should discuss any workforce development programs that may be needed.

- Figure 6.4-2 Map of Congested Areas:

1. The Department appreciates the Applicant's attention to congestion mitigation, and the associated cost benefits to ratepayers from addressing congestion and the curtailment of low-cost resources.

2. The Department notes that the Minnesota Transmission Owners (MTO) highlighted binding congestion constraints in the Grid Enhancing Technologies (GETs) Report they filed for approval on October 31, 2025.[13] Xcel Energy, one of the co-Applicants for this petition, is also a Minnesota Transmission Owner.

[10] Appendix D at pg. 2.
[11] Ibid. at pg. 9.
[12] Petition at 26.
[13] *In the Matter of the 2025 Minnesota Biennial Transmission Projects Report.* Minnesota Transmission Owners, Grid Enhancing Technologies Study Report, October 31, 2025, Docket No. E999/M-25-99, (eDockets) 202510-224474-04 at Appendix B (hereinafter "GETs Report").

The GETs Report identified binding constraints in the state of Minnesota. The Department recommends the Applicant provide more insight into which, if any, of the binding constraints in Figure 6.4-2 also appear in the GETs Report.

This includes information about how the proposed project will implement FERC Order 881, requiring all transmission owners to implement ambient-adjusted ratings (AAR) on their transmission lines. Additionally, FERC Order 1920 requires transmission owners to consider implementation of advanced transmission technologies (ATTs), such as grid enhancing hardware and software, such as dynamic line rating, advanced power flow control, advanced conductor materials and other innovations. The Department recommends the Applicant provide more detail as to how the Applicants could comply with the aforementioned FERC Orders, which mandate consideration of ATTs, in its petition.

3. The Department recommends Applicants provide additional information for how Applicants plan to implement AAR and other advanced transmission technologies (ATTs) as part of the proposed project as required by FERC Order 881 and FERC Order 1920, respectively.

IV. DEPARTMENT RECOMMENDATIONS

Based on the Department's analysis of the petition, the information in the record, and the Department's review of the draft petition, the Department has prepared one recommendation which is provided below.

A. COMPLETENESS REVIEW

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

Attachment 1 – Completeness Checklist

Attachment 2 – Project Map

Figure 1: Gopher to Badger Link Project Notice Area[14]

[14] Initial Application at 20. Map copied from Applicant's petition for clarity.

Minnesota Rule	Short Description	Rule Text	Location (if exempt, note alternative data)	Complete?	Comments and Questions
Not a rule	Pre Application Checklist	In table form, a pre application checklist that includes the rule, text, and where we can find it in application.	Attachment A	Yes	1. Ensure that the completeness checklist matches the location of the information or data in the petition. This allows for more efficient review by the Department, and better information for the public. Please review the Department's Attachment 1 for instances where section numbering may not match up with content.
7849.0240 (1)	Need Summary	An application must contain a summary of the major factors that justify the need for the proposed facility. This summary must not exceed, without the approval of the commission, 15 pages in length, including text, tables, graphs, and figures.	1.1 and 1.4, 1.5	Yes	
7849.0240(2)	Additional Considerations	Each application shall contain an explanation of the relationship of the proposed facility to each of the following socioeconomic considerations:			
7849.0240(2)(A)	Socially Beneficial Uses	socially beneficial uses of the output of the facility, including its uses to protect or enhance environmental quality;	6.5.3	Yes	
7849.0240(2)(B)	Promotional Activities	promotional activities that may have given rise to the demand for the facility;	6.8	Yes	
7849.0240(2)(C)	Future Development	the effects of the facility in inducing future development.	6.9	Yes	
7849.0260	Project Description	Each application for a proposed LHVTL must include:			
7849.0260(A)	Description of Facility	a description of the type and general location of the proposed line, including:			
7849.0260(A)(1)	Design Voltage	the design voltage;	2.1	yes	
7849.0260(A)(2)	Conductors	the number, the sizes, and the types of conductors;	2.2.3	yes	1. The Applicants state that the project will use different conductors for different segments. Segment 1 will feature a six-conductor bundle of 1192.5 thousand circular mil (kcmil) 45/7 aluminum conductor steel reinforced (ACSR) Bunting conductor, while the Segment 2 will use a six-conductor bundle of 795 kcmil 30/19 ACSR Mallard conductor for the double-circuit 765 kV circuit and two-conductor bundles of 795 kcmil 30/19 ACSR Mallard conductors for the 161 kV circuit. 2. The petition states that "Xcel Energy identified the 1192.5 45/7 Bunting as appropriate for the project based on a study of 17 conductors." The Department would appreciate a review of costs and benefits to ratepayers from enabling more transmission capacity from advanced conductor technologies, beyond ACSR. This could include how various additional transmission components, such as line sag, temperature, and weather conditions, affect transmission line output. 3. The Department requests additional information on how the Applicants decided to use these ACSR conductors, as well as whether any advanced conductors were included in that study, in Applicant's reply comments.
7849.0260(A)(3)	Line Losses	the expected losses under projected maximum loading and under projected average loading in the length of the transmission line and at the terminals or substations;	Alternative Data provided in 6.6.3 (Completeness Appendix mistakenly says 6.6.4)	yes	
7849.0260(A)(4)	Length	the approximate length of the proposed transmission line and the portion of that length in Minnesota;	1.2.1 Project Facilities	Yes	
7849.0260(A)(5)	Terminal Location	the approximate location of DC terminals or AC substations, which information shall be on a map of appropriate scale;	Figure 1.8-1 and sections 1.2.1.3 and 2.4	yes	
7849.0260(A)(6)	Affected Counties	a list of all counties reasonably likely to be affected by construction and operation of the proposed line;	Figure 1.8-1 has visual with likely affected counties. Mistakenly lists information as in 1.2, mistakenly lists 2.0.	No	Segment 2 has construction of new 161 kV three-circuit breaker switching station in Houston county, Minnesota. Figure 1.8-1 shows map of proposed project area. Applicants could consider adding a succinct list of all affected counties in future communications. Information is present in figure 1.8-1, but a list would make the document searchable.
7849.0260(B)	Description of Alternatives	a discussion of the availability of alternatives to the facility, including but not limited to:			

Minnesota Rule	Short Description	Rule Text	Location (if exempt, note alternative data)	Complete?	Comments and Questions
7849.0260(B)(1)	New Generation	new generation of various technologies, sizes, and fuel types;	7.3, table 1.6-1 also has generation and NWA that were investigated.	Yes	Applicants looked at adding local generation as a direct alternative to the proposed project. Adding local capacity does not increase generation outlet capacity or transfer capability, addresses energy adequacy at local level. Peaking generation to meet NERC steady state reliability needs = 5,172 MW, cost of roughly $4.4 - $6.45 billion, with 56 different transmission upgrades. Renewable generation would need multstate geographic diversity across all hours of the year to ensure reliability. Battery storage (or co-located with renewables) would be 7,527 MW w/ total capital cost of $12.879 Billion. Studied projects are $5.919 billion when looking at capital cost of alternatives. The Project "proactively enable load growth beyond the base forecast" (127). There is also a typo in Table 7.3-3, 8 hour batteries are not $2626 billion, but should be "$26." Are projects identified for peaking or renewables or battery storage all in Minnesota, or across the MISO North grid? The Applicants have said the total cost will be between $920 million-$1.3 billion. Please explain how the capital costs of $5.919 billion relate to the project costs.
7849.0260(B)(2)	Upgrade Existing Facility	upgrading of existing transmission lines or existing generating facilities;	7.4.1	Yes	
7849.0260(B)(3)	Different Voltages & Conductors	transmission lines with different design voltages or with different numbers, sizes, and types of conductors;	7.2	Partial	
7849.0260(B)(4)	Different Endpoints	transmission lines with different terminals or substations;	Discussed in 7.4.2 and Exemption Order	Yes	
7849.0260(B)(5)	Double Circuit Existing Lines	double circuiting of existing transmission lines;	7.4.3	Yes	1. The 765 kV high voltage transmission lines are proposed as single-circuit, due to reliability contingencies that emerge when 765 kV lines are double-circuited. However, the 161 kV portion of Segment 2 will be double-circuited. 2. Can Applicants clarify that “double-circuit” modifies the 161 kV, not the 765 kV portion of the line in future filings? For clarity, the Department recommends that the petition read "single circuit 765 kV/double circuit 161 kV HVTL."
7849.0260(B)(6)	DC transmission line	if the proposed facility is for DC (AC) transmission, an AC (DC) transmission line;	7.4.4	Yes	
7849.0260(B)(7)	Underground LIne	if the proposed facility is for overhead (underground) transmission, an underground (overhead) transmission line;	7.4.5	Yes	
7849.0260(B)(8)	Reasonable Combinations	any reasonable combinations of the alternatives listed in subitems (1) to (7);	N/A	Yes	
7849.0260(C)	Alternatives Details	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:			
7849.0260(C)(1)	Cost in Current Dollars	its total cost in current dollars;	2.5	Yes	Project Cost is estimated at $979 - $1.273 billion in 2024 dollars. 1.The project cost estimates are proposed to be between $979 million (low-range) to $1.273 billion (high-range). The Department requests that Applicants add more details of how the project components cost estimates were calculated and what portion is related to risk reserves. 2.The Department likewise requests more details of project costs and how they are affected with section 232 tariffs for steel, copper and aluminum, in addition to any other potential cost drivers. 3.What changes, if any, do Applicants envision to cost estimates, following the Supreme Court’s decision declaring the International Emergency Economic Powers Act (IEEPA) tariffs unconstitutional? 4.Additionally, the Department requests additional information as to how the proposed project’s cost estimates with risk reserves relate to the LRTP and Multi-Value project (MVP) variance analysis process.
7849.0260(C)(2)	Service Life	its service life;	3.4.3	Yes	
7849.0260(C)(3)	Average Annual Availability	its estimated average annual availability;	9.5	Yes	

Minnesota Rule	Short Description	Rule Text	Location (if exempt, note alternative data)	Complete?	Comments and Questions
7849.0260(C)(4)	O & M Costs	its estimated annual operating and maintenance costs in current dollars;	2.5.2	Yes	1. The Applicants estimate that the annual costs of operations and maintenance for the proposed project will be $3,200 - $4,500 per mile. For Segment 1 of the proposed project, which totals 34 miles, the annual O&M costs would be an estimated $108,00 - $153,000. The 105-mile stretch comprising Segment 2 would cost an estimated $336,000 - $472,500 per year. Based on these costs for O&M expenses, the Department requests more details of the assumptions underpinning these O&M cost estimates. For example, do the cost estimates feature an escalator to account for inflation? It is likely that costs near the end of the useful lifespan of the proposed project will require more maintenance than in early years. Can Applicants provide their cost escalator, if used?
7849.0260(C)(5)	Effect on Rates	an estimate of its effect on rates systemwide and in Minnesota, assuming a test year beginning with the proposed in-service date;	Exemption Granted: Substitute material discussed in chapter 2.6.2 and 2.6.3	Partial	
7849.0260(C)(6)	Losses	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, or expressed for a generating facility as the estimated heat rate;	Exemption Granted: alternate info in 6.6.3	Yes	Typo: petition said that this would be in 6.6.4, but that section doesn't exist. Found in 6.6.3
7849.0260(C)(7)	Major Assumptions	the major assumptions made in providing the information in subitems (1) to (6);	1.6; 2.5; 6.2.1; 7.1	Yes	
7849.0260(D)	System Map	a map (of appropriate scale) showing the applicant's system or load center to be served by the proposed LHVTL	1.8-1	Yes	
7849.0260(E)	Other Relevant Information	such other information about the proposed facility and each alternative as may be relevant to determination of need.	Petition	Yes	
7849.0270(1)	Forecast: Scope	Each application shall contain pertinent data concerning peak demand and annual electrical consumption within the applicant's service area and system, as provided in part 7849.0220, including but not limited to the data requested in subpart 2, item B. When recorded data is not available, or when the applicant does not use the required data in preparing its own forecast, the applicant shall use an estimate and indicate in the forecast justification section in subparts 3 to 6 the procedures used in deriving the estimate. The application shall clearly indicate which data are historical and which are projected. It is expected that data provided by the applicant should be reasonable and internally consistent.	Exemption Granted: Alternative info included in Ch 1,2,5,6, and Appendices D, E, and F.	Yes	
7849.0270(2)	Forecast Content	For each forecast year, the following data must be provided:			
7849.0270(2)(A)	Annual Consumption	when the applicant's service area includes areas other than Minnesota, annual electrical consumption by ultimate consumers within the applicant's Minnesota service area;	Exemption Granted: substitute info in Ch 1,2,5,6, and Appendices D,E, and F	Yes	1. Applicants provided a discussion of load forecasts, and the extent to which the Applicant coordinates its load forecasts with those of other systems. Applicants discussed the MISO Transmission Expansion Plan 2024 (MTEP24) process in Chapter 5 and Appendix F, respectively. Can Applicants provide additional detail around how involved they were in planning assumptions in MTEP and Futures planning? For example, what data did Applicants provide to MISO beyond integrated resource plan data and state policy language, if any? How much did MISO consult DCP and Xcel as transmission owners (TOs), versus consulting with TOs across the MISO North region?
7849.0270(2)(B)	Number of Customers by Class	for each of the following categories, estimates of the number of ultimate consumers within the applicant's system and annual electrical consumption by those consumers: (1) farm, excluding irrigation and drainage pumping; (2) irrigation and drainage pumping; (3) nonfarm residential; (4) commercial; (5) mining; (6) industrial; (7) street and highway lighting; (8) electrified transportation; (9) other (this category shall include municipal water pumping facilities, oil and gas pipeline pumping facilities, military camps and bases, and all other consumers not reported in subitems (1) to (8)); and (10) the sum of subitems (1) to (9);	Exemption Granted: substitute info provided as AFRs from DPC and Xcel in Appendix E	Yes	
7849.0270(2)(C)	Peak Demand by Class	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;	Exemption Granted: substitute info provided as AFRs from DPC and Xcel in Appendix E	Yes	

Minnesota Rule	Short Description	Rule Text	Location (if exempt, note alternative data)	Complete?	Comments and Questions
7849.0270(2)(D)	Monthly Peak Demand	the applicant's system peak demand by month;	Exemption Granted: substitute info provided as AFRs from DPC and Xcel in Appendix E	Yes	
7849.0270(2)(E)	Revenue Req.	the estimated annual revenue requirement per kilowatt hour for the system in current dollars;	Exemption Granted: substitute info provided as AFRs from DPC and Xcel in Appendix E	Yes	1. Appendix D of the Applicant's petition features a list of Xcel's revenue requirements. On pg. 2, Xcel lists its all-in project revenue requirement as $1.518 billion, with a net cost to MN jurisdiction as $1.112 billion. However, on page 9 of Appendix D, the Applicants then list that the all-in project revenue requirement is $1.971 billion, with a net cost to the MN jurisdiction as $1.444 billion. 2. Can Applicants explain their derivations of these numbers? The Department requests that Applicants provide more details and calculations for coming to these numbers in Appendix D, including how the different dollar amounts for 'Total Project Costs' relate to each other. Additionally, can Applicants explain how these numbers relate to the overall costs of the project as reported in Section 2.5 of the initial Application?
7849.0270(2)(F)	Forecast: Content, Load Factor	the applicant's estimated average system weekday load factor by month; in other words, for each month, the estimated average of the individual load factors for each weekday in the month.	Exemption Granted: substitute info provided as AFRs from DPC and Xcel in Appendix E	Yes	
7849.0270(3)	Forecast Methodology	An applicant may use a forecast methodology of its own choosing, with due consideration given to cost, staffing requirements, and data availability. However, forecast data provided by the applicant is subject to tests of accuracy, reasonableness, and consistency. The applicant shall detail the forecast methodology employed to obtain the forecasts provided under subpart 2, including:			
7849.0270(3)(A)	Overall Framework	A. the overall methodological framework that is used;	Exemption Granted: AFRs from DPC and Xcel in Appendix E	Yes	
7849.0270(3)(B)	Analytical Techniques	the specific analytical techniques which are used, their purpose, and the components of the forecast to which they have been applied;	Exemption Granted: AFRs from DPC and Xcel in Appendix E	Yes	
7849.0270(3)(C)	Relation of Techniques	the manner in which these specific techniques are related in producing the forecast;	Exemption Granted: AFRs from DPC and Xcel in Appendix E	Yes	
7849.0270(3)(D)	Statistical Tests	where statistical techniques have been used: (1) the purpose of the technique; (2) typical computations (e.g., computer printouts, formulas used), specifying variables and data; and (3) the results of appropriate statistical tests;	Exemption Granted: AFRs from DPC and Xcel in Appendix E	Yes	
7849.0270(3)(E)	Confidence Levels	forecast confidence levels or ranges of accuracy for annual peak demand and annual electrical consumption, as well as a description of their derivation;	Exemption Granted: AFRs from DPC and Xcel in Appendix E	Yes	
7849.0270(3)(F)	Analysis of Methodology	a brief analysis of the methodology used, including: (1) its strengths and weaknesses; (2) its suitability to the system; (3) cost considerations; (4) data requirements; (5) past accuracy; and (6) other factors considered significant by the applicant;	Exemption Granted: AFRs from DPC and Xcel in Appendix E	Yes	
7849.0270(3)(G)	Discrepencies	an explanation of discrepancies that appear between the forecasts presented in the application and the forecasts submitted under chapter 7610 or in the applicant's previous certificate of need proceedings.	Exemption Granted: AFRs from DPC and Xcel in Appendix E	Yes	
7849.0270(4)	Forecast Data Bases: List	The applicant shall discuss the data base used in arriving at the forecast presented in its application, including:			
7849.0270(4)(A)	Forecast Data Bases: List	a complete list of all data sets used in making the forecast, including a brief description of each data set and an explanation of how each was obtained, (e.g., monthly observations, billing data, consumer survey, etc.) or a citation to the source (e.g., population projection from the state demographer's office);	Exemption Granted: AFRs from DPC and Xcel in Appendix E	Yes	

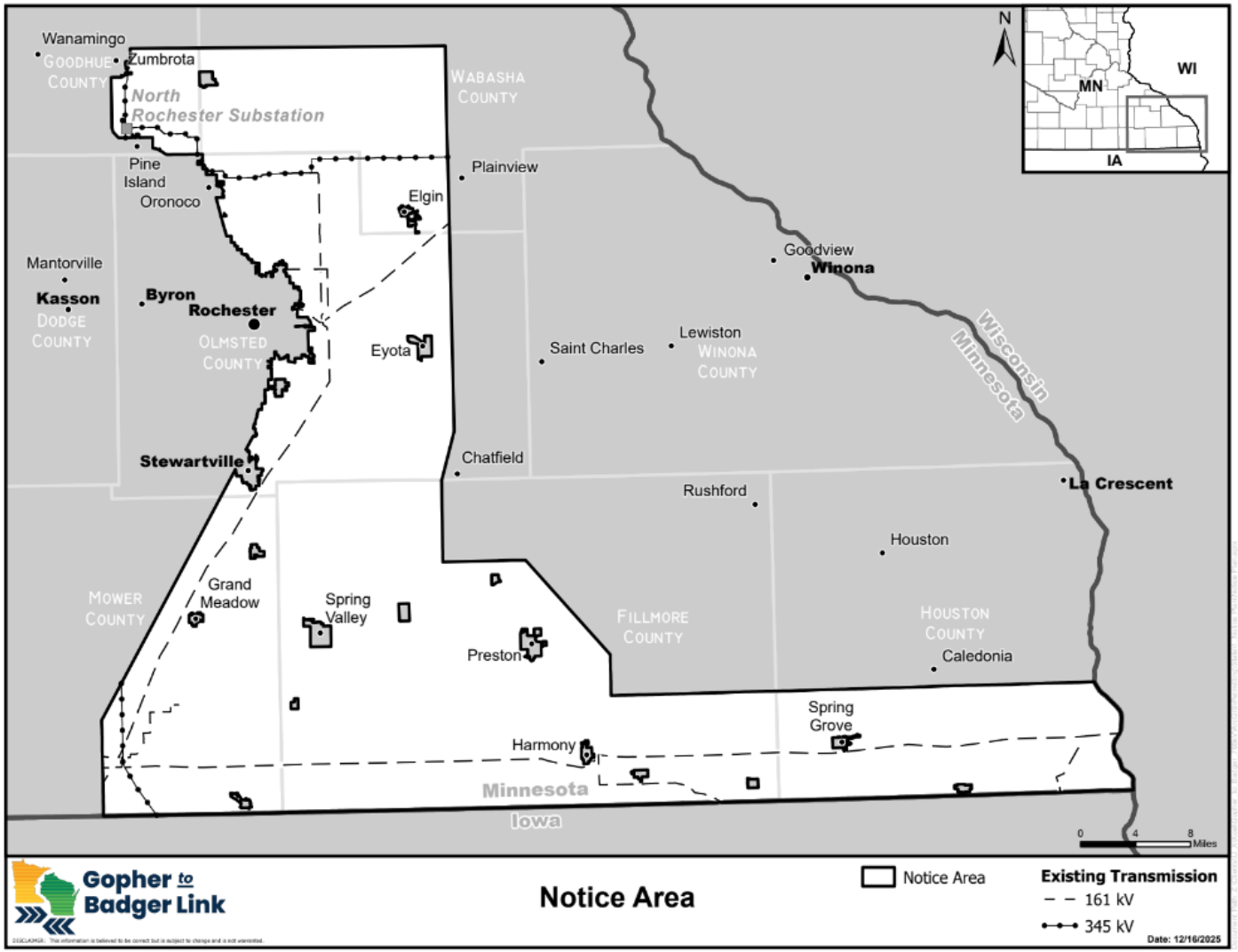
Minnesota Rule	Short Description	Rule Text	Location (if exempt, note alternative data)	Complete?	Comments and Questions
7849.0270(4)(B)	Forecast Data Bases: Adjustments	a clear identification of any adjustments made to raw data in order to adapt them for use in forecasts, including: (1) the nature of the adjustment; (2) the reason for the adjustment; and (3) the magnitude of the adjustment. The applicant shall provide to the commission or the administrative law judge on demand copies of the data sets used in making the forecasts, including both raw and adjusted data, input and output data.	Exemption Granted: AFRs from DPC and Xcel in Appendix E	Yes	
7849.0270(5)	Forecast Assumptions	The applicant shall discuss each essential assumption made in preparing the forecast, including the need for the assumption, the nature of the assumption, and the sensitivity of forecast results to variations in the essential assumptions. The applicant shall discuss the assumptions made regarding:			
7849.0270(5)(A)	Energy Sources	the availability of alternate sources of energy;	Exemption Granted: AFRs from DPC and Xcel in Appendix E	Yes	
7849.0270(5)(B)	Fuel Switching	the expected conversion from other fuels to electricity or vice versa;	Exemption Granted: AFRs from DPC and Xcel in Appendix E	Yes	
7849.0270(5)(C)	Energy Prices	future prices of electricity for customers in the applicant's system and the effect that such price changes will likely have on the applicant's system demand;	Exemption Granted: AFRs from DPC and Xcel in Appendix E	Yes	
7849.0270(5)(D)	Data Availability	the data requested in subpart 2 that is not available historically or not generated by the applicant in preparing its own internal forecast;	Exemption Granted: AFRs from DPC and Xcel in Appendix E	Yes	
7849.0270(5)(E)	Conservation	the effect of energy conservation programs on long-term electrical demand	Exemption Granted: AFRs from DPC and Xcel in Appendix E	Yes	
7849.0270(5)(F)	Other Factors	any other factor considered by the applicant in preparing the forecast.	Exemption Granted: AFRs from DPC and Xcel in Appendix E	Yes	
7849.0270(6)	Forecast Coordination	The applicant shall provide:			
7849.0270(6)(A)	Forecast Coordination: Extent	a description of the extent to which the applicant coordinates its load forecasts with those of other systems, such as neighboring systems and associate systems in a power pool or coordinating organization;	Ch5, Appendix F	Partial	MTEP 24 process discussed for MISO's grid planning initiatives. **Can DPC and Xcel discuss how involved they were in planning assumptions in MTEP and Futures? How much did MISO consult DPC and Xcel as TOs while planning MTEP, versus TOs across the MISO North region?**
7849.0270(6)(B)	Forecast Coordination: Manner	a description of the manner in which such forecasts are coordinated, and any problems experienced in efforts to coordinate load forecasts.	Ch 5, Appendix F	Yes	
7849.0280	System Capacity	The applicant shall describe the ability of its existing system to meet the demand for electrical energy forecast in response to part 7849.0270 and the extent to which the proposed facility will increase this capability. In preparing this description, the applicant shall present the following information:			
7849.0280(A)	Power Planning Programs	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;	1.4,2.2,5.1-5.3,6.2.1,6.6	Yes	
7849.0280(B)	Firm Transactions	the applicant's seasonal firm purchases and seasonal firm sales for each utility involved in each transaction for each of the forecast years;	Exemption Granted	Exempt	
7849.0280(C)	Participation Transactions	the applicant's seasonal participation purchases and seasonal participation sales for each utility involved in each transaction for each of the forecast years;	Exemption Granted	Exempt	

Minnesota Rule	Short Description	Rule Text	Location (if exempt, note alternative data)	Complete?	Comments and Questions
7849.0280(D)	Load and Capability Table, Existing System	for the summer season and for the winter season corresponding to each forecast year, the load and generation capacity data requested in subitems (1) to (13), including the anticipated purchases, sales, capacity retirements, and capacity additions, except those that depend on certificates of need not yet issued by the commission: (1) seasonal system demand; (2) annual system demand; (3) total seasonal firm purchases; (4) total seasonal firm sales; (5) seasonal adjusted net demand (subitem (1) minus subitem (3) plus subitem (4)); (6) annual adjusted net demand (subitem (2) minus subitem (3) plus subitem (4)); (7) net generating capacity; (8) total participation purchases; (9) total participation sales; (10) adjusted net capability (subitem (7) plus subitem (8) minus subitem (9)); (11) net reserve capacity obligation; (12) total firm capacity obligation (subitem (5) plus subitem (11)); and (13) surplus or deficit (-) capacity (subitem (10) minus subitem (12));	Exemption Granted	Exempt	
7849.0280(E)	Load and Capability Table, With Proposed Facility	for the summer season and for the winter season corresponding to each forecast year subsequent to the year of application, the load and generation capacity data requested in item D, subitems (1) to (13), including purchases, sales, and generating capability contingent on the proposed facility;	Exemption Granted	Exempt	
7849.0280(F)	Load and Capability Table, With All Future Generation	for the summer season and for the winter season corresponding to each forecast year subsequent to the year of application, the load and generation capacity data requested in item D, subitems (1) to (13), including all projected purchases, sales, and generating capability;	Exemption Granted	Exempt	
7849.0280(G)	Proposed Additions and Retirments	for each of the forecast years subsequent to the year of application, a list of proposed additions and retirements in net generating capability, including the probable date of application for any addition that is expected to require a certificate of need;	Exemption Granted	Exempt	
7849.0280(H)	Monthly Data	for the previous calendar year, the current year, the first full calendar year before the proposed facility is expected to be in operation and the first full calendar year of operation of the proposed facility, a graph of monthly adjusted net demand and monthly adjusted net capability, as well as a plot on the same graph of the difference between the adjusted net capability and actual, planned, or estimated maintenance outages of generation and transmission facilities; and	Exemption Granted	Exempt	
7849.0280(I)	Reserve Margin Discussion	a discussion of the appropriateness of and the method of determining system reserve margins, considering the probability of forced outages of generating units, deviation from load forecasts, scheduled maintenance outages of generation and transmission facilities, power exchange arrangements as they affect reserve requirements, and transfer capabilities.	Exemption Granted	Exempt	
7849.0290	Conservation Programs	An application must include:			
7849.0290(A)	Conservation Programs	the name of the committee, department, or individual responsible for the applicant's energy conservation and efficiency programs, including load management;	Exemption Granted: alternative info in Chapters 5 and 7, appendices G and E	Yes	
7849.0290(B)	Conservation Programs: Goals	a list of the applicant's energy conservation and efficiency goals and objectives;	Exemption Granted: alternative info in Chapters 5 and 7, appendices G and E	Yes	
7849.0290(C)	Conservation Programs: List	a description of the specific energy conservation and efficiency programs the applicant has considered, a list of those that have been implemented, and the reasons why the other programs have not been implemented;	Exemption Granted: alternative info in Chapters 5 and 7, appendices G and E	Yes	
7849.0290(D)	Conservation Programs: Accomplisments	a description of the major accomplishments that have been made by the applicant with respect to energy conservation and efficiency;	Exemption Granted: alternative info in Chapters 5 and 7, appendices G and E	Yes	
7849.0290(E)	Conservation Programs: Plans	a description of the applicant's future plans through the forecast years with respect to energy conservation and efficiency;	Exemption Granted: alternative info in Chapters 5 and 7, appendices G and E	Yes	
7849.0290(F)	Conservation Programs: Quantification	a quantification of the manner by which these programs affect or help determine the forecast provided in response to part 7849.0270, subpart 2, a list of their total costs by program, and a discussion of their expected effects in reducing the need for new generation and transmission facilities.	Exemption Granted: alternative info in Chapters 5 and 7, appendices G and E	Yes	
7849.0300	Consequences of Delay	The applicant shall present a discussion of anticipated consequences to its system, neighboring systems, and the power pool should the proposed facility be delayed one, two, and three years, or postponed indefinitely. This information must be provided for the following three levels of demand: the expected demand provided in response to part 7849.0270, subpart 2, and the upper and lower confidence levels provided in response to part 7849.0270, subpart 3, item E.	Exemption Granted: alternative info in Chapters 5 and 7, appendices G and E	Yes	

Minnesota Rule	Short Description	Rule Text	Location (if exempt, note alternative data)	Complete?	Comments and Questions
7849.0310	Environmental Info Reqired	Each applicant shall provide environmental data for the proposed facility and for each alternative considered in detail in response to part 7849.0250, item C or 7849.0260, item C. Information relating to construction and operation of each of these alternatives shall be provided as indicated in parts 7849.0320 to 7849.0340, to the extent that such information is reasonably available to the applicant and applicable to the particular alternative. Where appropriate, the applicant shall submit data for a range of possible facility designs. Major assumptions should be stated, and references should be cited where appropriate.	chapter 10	Yes	
7849.0320	Generator Alternative Info	The applicant shall provide the following information for each alternative that would involve construction of an LEGF:			
7849.0320(A)	Land Required	the estimated range of land requirements for the facility with a discussion of assumptions on land requirements for water storage, cooling systems, and solid waste storage;	N/A	N/A	
7849.0320(B)	Traffic	the estimated amount of vehicular, rail, and barge traffic generated by construction and operation of the facility;	N/A	N/A	
7849.0320(C)	Fossil Fuel Information	for fossil-fueled facilities:	N/A	N/A	
7849.0320(C)(1)	Fuel Sources	the expected regional sources of fuel for the facility;	N/A	N/A	
7849.0320(C)(2)	Fuel Requirement	the typical fuel requirement (in tons per hour, gallons per hour, or thousands of cubic feet per hour) during operation at rated capacity and the expected annual fuel requirement at the expected capacity factor;	N/A	N/A	
7849.0320(C)(3)	Heat Rate	the expected rate of heat input for the facility in Btu per hour during operation at rated capacity;	N/A	N/A	
7849.0320(C)(4)	Heat Value	the typical range of the heat value of the fuel (in Btu per pound, Btu per gallon, or Btu per 1,000 cubic feet) and the typical average heat value of the fuel;	N/A	N/A	
7849.0320(C)(5)	Fuel Content	the typical ranges of sulfur, ash, and moisture content of the fuel;	N/A	N/A	
7849.0320(D)	Fossil Fuel Information	for fossil fueled facilities:	N/A	N/A	
7849.0320(D)(1)	Trace Elements	the estimated range of trace element emissions and the maximum emissions of sulfur dioxide, nitrogen oxides, and particulates in pounds per hour during operation at rated capacity; and	N/A	N/A	
7849.0320(D)(2)	Emission Concentrations	the estimated range of maximum contributions to 24-hour average ground level concentrations at specified distances from the stack of sulfur dioxide, nitrogen oxides, and particulates in micrograms per cubic meter during operation at rated capacity and assuming generalized worst-case meteorological conditions;	N/A	N/A	
7849.0320(E)	Water Use	water use by the facility for alternate cooling systems, including: (1) the estimated maximum use, including the groundwater pumping rate in gallons per minute and surface water appropriation in cubic feet per second; (2) the estimated groundwater appropriation in million gallons per year; and (3) the annual consumption in acre-feet;	N/A	N/A	
7849.0320(E)	Water Use	water use by the facility for alternate cooling systems, including:			
7849.0320(E)(1)	Water Use	the estimated maximum use, including the groundwater pumping rate in gallons per minute and surface water appropriation in cubic feet per second;	N/A	N/A	
7849.0320(E)(2)	Water Use	(2) the estimated groundwater appropriation in million gallons per year;	N/A	N/A	
7849.0320(E)(3)	Water Use	the annual consumption in acre-feet;	N/A	N/A	
7849.0320(F)	Discharges	the potential sources and types of discharges to water attributable to operation of the facility;	N/A	N/A	
7849.0320(G)	Radioactive Releases	radioactive releases, including:	N/A	N/A	
7849.0320(G)(1)	Nuclear Facilities	for nuclear facilities, the typical types and amounts of radionuclides released by the facility in curies per year for alternate facility designs and levels of waste treatment;	N/A	N/A	
7849.0320(G)(2)	Fossil Fuel Facilities	for fossil-fueled facilities, the estimated range of radioactivity released by the facility in curies per year;	N/A	N/A	
7849.0320(H)	Solid Wastes	the potential types and quantities of solid wastes produced by the facility in tons per year at the expected capacity factor;	N/A	N/A	
7849.0320(I)	Noise	the potential sources and types of audible noise attributable to operation of the facility;	N/A	N/A	
7849.0320(J)	Work Force	the estimated work force required for construction and operation of the facility;	N/A	N/A	
7849.0320(K)	Transmission	the minimum number and size of transmission facilities required to provide a reliable outlet for the generating facility.	N/A	N/A	
7849.0330	Transmission Facilities	The applicant shall provide data for each alternative that would involve construction of an LHVTL. The following information must be included:			
7849.0330(A)	Overhead Transmission	for overhead transmission facilities:			
7849.0330(A)(1)	Overhead Transmission: Structure/Conductor Diagram	schematic diagrams that show the dimensions of the support structures and conductor configurations for each type of support structure that may be used;	2.2.2, Appendix C	Yes	
7849.0330(A)(2)	Overhead Transmission: Electric Fields	a 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	Yes	
7849.0330(A)(3)	Overhead Transmission: Ozone and Nitrogen Oxide	a discussion of ozone and nitrogen oxide emissions attributable to the transmission facility;	8.2	Yes	
7849.0330(A)(4)	Overhead Transmission: Radio and TV Interference	a discussion of radio and television interference attributable to the transmission facility;	8.4	Yes	
7849.0330(A)(5)	Overhead Transmission: Audible Noise	a discussion of the characteristics and estimated maximum and typical levels of audible noise attributable to the transmission facilities;	8.3	Yes	
7849.0330(B)	Underground Transmission	for underground transmission facilities:			

Minnesota Rule	Short Description	Rule Text	Location (if exempt, note alternative data)	Complete?	Comments and Questions
7849.0330(B)(1)	Cable Types	the types and dimensions of the cable systems and associated facilities that would be used;	N/A	N/A	
7849.0330(B)(2)	Cable Materials	the types and quantities of materials required for the cable system, including materials required for insulation and cooling of the cable;	N/A	N/A	
7849.0330(B)(3)	Cable Heat	the amount of heat released by the cable system in kilowatts per foot of cable length;	N/A	N/A	
7849.0330(C)	Right-of-Way	the estimated width of the right-of-way required for the transmission facility;	1.2.1 and 9.2	Yes	
7849.0330(D)	Construction Practices	a description of construction practices for the transmission facility;	9.3,9.4	Yes	
7849.0330(E)	O & M Practices	a description of operation and maintenance practices for the transmission facility;	9.5,9.6	Yes	
7849.0330(F)	Work Force	the estimated work force required for construction and for operation and maintenance of the transmission facility;	2.5.2	Yes	1. In Section 2.7, Applicants discuss the workforce requirements for construction of the proposed project, estimating that more than 800 personnel may be needed to construct the proposed project. 2. Can the Applicants discuss whether Southeastern Minnesota currently has the workforce capable of providing 800 personnel with sufficient experience and training to construct this project? If not, can Applicants discuss any workforce development programs that may be needed?
7849.0330(G)	Description of Region	a narrative description of the major features of the region between the endpoints of the transmission facility. The region shall encompass the likely area for routes between the endpoints. The description should emphasize the area within three miles of the endpoints. The following information shall be described where applicable:			
7849.0330(G)(1)	Hydrologic Features	hydrologic features including lakes, rivers, streams, and wetlands;	Exemption Granted: alternative info in Ch 10	Yes	
7849.0330(G)(2)	Vegetation & Wildlife	natural vegetation and associated wildlife;	Exemption Granted: alternative info in Ch 11	yes	
7849.0330(G)(3)	Physiographic Regions	physiographic regions;	Exemption Granted: alternative info in Ch 12	yes	
7849.0330(G)(4)	Land Use	land-use types, including human settlement, recreation, agricultural production, forestry production, and mineral extraction.	Exemption Granted: alternative info in Ch 13	yes	
7849.0340	No-facility Alternative	For each of the three levels of demand specified in part 7849.0300, the applicant shall provide the following information for the alternative of no facility:			
7849.0340(A)	Existing System Impact	a description of the expected operation of existing and committed generating and transmission facilities;	Exemption Granted: alternative info in 7.7	Yes	
7849.0340(B)	Resource Requirements & Emissions	a description of the changes in resource requirements and wastes produced by facilities discussed in response to item A, including: (1) the amount of land required; (2) induced traffic; (3) fuel requirements; (4) airborne emissions; (5) water appropriation and consumption; (6) discharges to water; (7) reject heat; (8) radioactive releases; (9) solid waste production; (10) audible noise; and (11) labor requirements;	Exemption Granted: alternative info in 7.8	Yes	
7849.0340(C)	Reducing Impacts	a description of equipment and measures that may be used to reduce the environmental impact of the alternative of no facility.	Exemption Granted: alternative info in 7.9	Yes	

Figure 1.8-1: Gopher to Badger Link Project Notice Area



CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of people by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Comments

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

Dated this **25th** day of **February 2026**

/s/Sharon Ferguson

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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	Official 25-121
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15	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	Official 25-121
16	Eric	Fehlhaber	efehlhaber@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	Official 25-121
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22	Corey	Hintz	chintz@dakotaelectric.com	Dakota Electric Association		4300 220th Street Farmington MN, 55024-9583 United States	Electronic Service		No	Official 25-121
23	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	Official 25-121
24	Frank	Hornstein	frank.hornstein@minneapolismn.gov	City of Minneapolis		350 South 5th Street Minneapolis MN, 55415 United States	Electronic Service		No	Official 25-121
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#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
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37	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	Official 25-121
38	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	Official 25-121

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
39	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	Official 25-121
40	Max	Meyer	mmeyer@misoenergy.org	Midcontinent Independent System Operator, Inc.		2985 Ames Crossing Road Eagan MN, 55121 United States	Electronic Service		No	Official 25-121
41	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-121
42	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-121
43	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	Official 25-121
44	Matthew	Olsen	molsen@otpco.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	Official 25-121
45	Carol A.	Overland	overland@legalectric.org	Legalectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	Official 25-121
46	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	Official 25-121
47	Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	Official 25-121
48	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		No	Official 25-121
49	Benjamin L.	Porath	ben.porath@dairylandpower.com	Dairyland Power Cooperative		3200 East Ave S PO Box 817 La Crosse WI, 54602-0817 United States	Electronic Service		No	Official 25-121
50	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,	Electronic Service		Yes	Official 25-121

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55101-2131 United States				
51	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	Official 25-121
52	Susan	Romans	sromans@allete.com	Minnesota Power		30 West Superior Street Legal Dept Duulth MN, 55802 United States	Electronic Service		No	Official 25-121
53	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-121
54	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	Official 25-121
55	Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-121
56	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-121
57	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-121
58	Cary	Stephenson	cstephenson@otpco.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	Official 25-121
59	Stuart	Tommerdahl	stommerdahl@otpco.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States	Electronic Service		No	Official 25-121
60	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	Official 25-121
61	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-121
62	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	Official 25-121

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
63	Patrick	Zomer	pzomer@cozen.com	Cozen O'Connor		150 S. 5th Street, #1200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-121

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	David	Bell	david.bell@state.mn.us		Department of Health	POB 64975 St. Paul MN, 55164 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
2	Water Programs	Coordinator	waterprograms.bwsr@state.mn.us		Minnesota Board of Water and Soil Resources	520 Lafayette Road N St. Paul MN, 55155 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
3	Randall	Doneen	randall.doneen@state.mn.us		Department of Natural Resources	500 Lafayette Rd, PO Box 25 Saint Paul MN, 55155 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
4	Kate	Fairman	kate.fairman@state.mn.us		Department of Natural Resources	Box 32 500 Lafayette Rd St. Paul MN, 55155-4032 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
5	Annie	Felix Gerth	annie.felix-gerth@state.mn.us			Board of Water & Soil Resources 520 Lafayette Rd Saint Paul MN, 55155 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
6	Kari	Howe	kari.howe@state.mn.us		DEED	332 Minnesota St, #E200 1ST National Bank Bldg St. Paul MN, 55101 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
7	Dean	Hunter	dean.hunter@state.mn.us		Minnesota Department of Labor & Industry	443 Lafayette Rd N St. Paul MN, 55155-4341 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
8	Raymond	Kirsch	raymond.kirsch@state.mn.us		Public Utilities Commission	121 7th Place E, Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
9	Chad	Konickson	chad.konickson@usace.army.mil	U.S.Army Corps of Engineers		332 Minnesota St. Suite E1500 Saint Paul MN, 55101 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
10	Stacy	Kotch Egstad	stacy.kotch@state.mn.us		MINNESOTA DEPARTMENT OF TRANSPORTATION	395 John Ireland Blvd. St. Paul MN, 55155 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
11	Dawn S	Marsh	dawn_marsh@fws.gov	U.S. Fish & Wildlife Service		Minnesota-Wisconsin Field Offices 4101 American Blvd E Bloomington MN, 55425 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
12	Stephan	Roos	stephan.roos@state.mn.us		Minnesota Department of Agriculture	625 Robert St N Saint Paul MN, 55155-2538 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS

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13	Jayme	Trusty	execdir@swrdc.org	SWRDC		2401 Broadway Ave #1 Slayton MN, 56172 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
14	Jen	Tyler	tyler.jennifer@epa.gov	US Environmental Protection Agency		Environmental Planning & Evaluation Unit 77 W Jackson Blvd. Mailstop B-19J Chicago IL, 60604-3590 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
15	Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources		500 Lafayette Road Box 25 St. Paul MN, 55155-4040 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
16	Alan	Whipple	sa.property@state.mn.us		Minnesota Department Of Revenue	Property Tax Division 600 N. Robert Street St. Paul MN, 55146-3340 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
17	Jonathan	Wolfgram	jonathan.wolfgram@state.mn.us		Office of Pipeline Safety	445 Minnesota St Ste 147 Woodbury MN, 55125 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS