



June 16, 2026

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

RE: IN THE MATTER OF THE APPLICATION FOR A CERTIFICATE OF NEED FOR THE POWERON MIDWEST
765 kV AND 345 kV HIGH VOLTAGE TRANSMISSION LINE PROJECT
DOCKET No. E002, ET2, ET6675/CN-25-117
CAH Docket No 28-2500-41617

Dear Ms. Bergman:

Great River Energy, Northern States Power Company, doing business as Xcel Energy, and ITC Midwest LLC (collectively, Applicants) respectfully submit the enclosed Applicants' Request for Clarification and/or Objection to June 9, 2026 Order and Scoping Decision, to the Minnesota Public Utilities Commission regarding the above-captioned docket.

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

Sincerely,

/s/ Dan Leshner

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





/s/ Jody L. Londo

Jody L. Londo

Regional Vice President, Regulatory Planning and Policy
Northern States Power Company

/s/ Margaret Kristian

Margaret Kristian

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COURT OF ADMINISTRATIVE HEARINGS
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**In the Matter of the Application for a
Certificate of Need for the PowerOn
Midwest 765 kV and 345 kV High Voltage
Transmission Line Project**

Docket No. E002, ET2, ET6675/CN-25-117
CAH Docket No. 28-2500-41617

**APPLICANTS' REQUEST FOR
CLARIFICATION AND/OR OBJECTION
TO JUNE 9, 2026, ORDER AND SCOPING
DECISION**

Great River Energy, Northern States Power Company, doing business as Xcel Energy, and ITC Midwest LLC (collectively, Applicants) submit this Request for Clarification and/or Objection to the Minnesota Public Utilities Commission's (Commission) June 9, 2026 Order and the related Environmental Report Scoping Decision (Scoping Decision) for the proposed PowerOn Midwest Project (Project). The issue raised in this Request/Objection is narrow and relates to one system alternative identified in the Scoping Decision. As such, the Applicants anticipate that this Request/Objection can be resolved without delays to the dates identified in the First Prehearing Order.

The Scoping Decision states that the Environmental Report will evaluate transmission alternatives including "partial-build or delayed-build alternatives for the Pleasant Valley-to-North Rochester 765-kV segment."¹ Elsewhere, the Scoping Decision states that "[a]lternatives with different endpoints than those identified for the proposed project, except where such endpoints are

¹ Order Approving the Proposed Environmental Report Scoping Decision, p. 7 (June 9, 2026) (eDocket No. [20266-232674-01](#)) (hereafter cited as "Scoping Decision").

consistent with Minn. Stat. § 216B.243, subd. 3(6)” will not be studied in the Environmental Report.²

The Applicants request clarification regarding the intended evaluation of the partial/delayed build alternative because such evaluation is inconsistent with Minn. Stat. § 216B.243, subd. 3(6), which limits the Commission’s evaluation of alternative endpoints to only two circumstances, neither of which is present here:

the commission must not require evaluation of alternative end points for a high-voltage transmission line qualifying as a large energy facility unless the alternative end points are (i) consistent with end points identified in a federally registered planning authority transmission plan, or (ii) otherwise agreed to for further evaluation by the applicant.

First, as the Applicants explained in their May 29, 2026 Response to Scoping Comments, the partial/delayed build for Pleasant Valley to North Rochester would result in a change in endpoints to LRTP 24, as approved by the Midcontinent Independent System Operator, Inc. (MISO).³ Specifically, LRTP 24 is a 765 kV line with endpoints at the Lakefield, Pleasant Valley, and North Rochester substations.⁴ The partial/delayed build alternative would change the endpoints for LRTP 24 because it would remove LRTP 24’s endpoint at the North Rochester Substation.

Second, the Applicants do not agree to further evaluation of these alternatives in the docket. For ease of reference, the Applicants summarize portions of their prior comments in the paragraphs below.

² Scoping Decision, p. 10.

³ Applicants’ Response to Scoping Comments, pp. 14-15, 18-20 (May 29, 2026) (eDocket No. [20265-232324-01](#)).

⁴ Joint Application to the Minnesota Public Utilities Commission for a Certificate of Need, p. 110 (Feb. 3, 2026) (eDocket No. [20262-227787-02](#)) (hereafter cited as “Application”).

Each Project component is needed and necessary because the LRTP Tranche 2.1 projects work together to address system needs. LRTP 24, with endpoints at Lakefield, Pleasant Valley, and North Rochester, is the primary “artery” for the Studied Projects⁵ – connecting Minnesota’s high voltage hubs to both generation sources and load sinks as described in the Application.⁶ The North Rochester 765 kV termination is thus intentional and essential. The North Rochester Substation has been a key component in each of MISO’s regional transmission plans going back to 2011. To date, there have been three regional portfolios that included projects connecting to the North Rochester Substation.⁷ The North Rochester Substation is a hub connecting Rochester, the Twin Cities, Mankato, and western Wisconsin and is an “on and off ramp” for power to flow to and from destinations to and well beyond Rochester on the high voltage and lower voltage systems.

The Applicants do not consent to further evaluation, given the exhaustive analysis MISO undertook and the role of the Project as part of a regional portfolio of projects designed and optimized to work together as Multi-Value Projects (MVPs) eligible for regional cost sharing under the MISO Open Access Transmission, Energy and Operating Reserve Markets Tariff. Given the critical nature of the North Rochester Substation hub, MISO designed the portfolio to have two transmission lines connecting at North Rochester, so that if one of the 765 kV lines is out of service, the substation could still be served by the other.⁸ A change in endpoint that eliminates North Rochester not only has implications to the Project, but would impact the broader MISO LRTP

⁵ The Studied Projects include the entirety of MISO designated LRTPs 22 through 26 from South Dakota to Wisconsin.

⁶ *See, e.g.*, Application, p. 110.

⁷ In Tranche 1, MISO approved the Mankato-Mississippi River Transmission Project. In the first MVP portfolio, MISO approved the Twin Cities-Rochester-La Crosse 345 kV Project.

⁸ MISO Comments, p. 4 (May 20, 2026) (eDocket No. [20265-232019-01](#)).

Tranche 2.1 portfolio. In addition, the delayed/partial build alternatives would be a new project and not eligible for cost sharing unless it also qualified as an MVP.⁹

In summary, a delayed/partial build for Pleasant Valley to North Rochester would change the end point of LRTP 24, as studied and approved by MISO. Applicants do not agree to the Environmental Report evaluating alternative endpoints to LRTP 24. Thus, Minn. Stat. § 216B.243, subd. 3(6) precludes consideration of the proposed alternative. The Scoping Decision states that end points that are inconsistent with the statute will not be studied, and the Applicants request that the Scoping Decision be clarified to avoid potential later public confusion.¹⁰ To the extent the Commission intends to study the delayed/partial build of LRTP 24, contrary to Minn. Stat. § 216B.243, subd. 3(6), the Applicants object to the June 9, 2026 Order.

Dated: June 16, 2026

/s/ Lisa M. Agrimonti

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⁹ MISO Comments, p. 3 (May 20, 2026) (eDocket No. [20265-232019-01](#)).

¹⁰ Scoping Decision, p. 10.

**IN THE MATTER OF THE APPLICATION FOR A
CERTIFICATE OF NEED FOR THE POWERON
MIDWEST 765 kV AND 345 kV HIGH VOLTAGE
TRANSMISSION LINE PROJECT**

**DOCKET NO. E002, ET2, ET6675/CN-25-117
CAH DOCKET No 28-2500-41617**

CERTIFICATE OF SERVICE

Breann L. Jurek certifies that on the 16th of June, 2026, she e-filed a true and correct copy of the **Applicants' Request for Clarification and/or Objection to June 9, 2026 Order and Scoping Decision**, on behalf of Great River Energy, Northern States Power Company, doing business as Xcel Energy, and ITC Midwest LLC via eDockets (www.edockets.state.mn.us).

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

Executed on June 16, 2026

Signed: /s/ Breann L. Jurek

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