



March 4, 2026

Sasha Bergman  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> 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 Reply Comments, including Attachments A and B, to the Minnesota Public Utilities Commission regarding the above-captioned docket.

This document has been e-filed today through [www.edockets.state.mn.us](http://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](mailto:jody.l.londo@xcelenergy.com) or Kathleen Galioto at [kathleen.galioto@dairylandpower.com](mailto: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  
Joseph K. Sullivan  
Audrey Partridge  
Hwikwon Ham  
John Tuma

Chair  
Vice-Chair  
Commissioner  
Commissioner  
Commissioner

**In the Matter of the Application for a  
Certificate of Need for the Gopher to  
Badger Link 765 kV High Voltage  
Transmission Line Project (LRTP 26)**

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

**APPLICANTS' REPLY COMMENTS**

**INTRODUCTION**

Northern States Power Company, doing business as Xcel Energy, and Dairyland Power Cooperative (Dairyland) (together, Applicants), respectfully submit these Reply Comments in accordance with the Notice of Comment Period on Application Completeness (Notice) issued by the Minnesota Public Utilities Commission (Commission).

As described in more detail herein, the Certificate of Need Application (Application) submitted by the Applicants for the Gopher to Badger Link 765 kilovolt (kV) Transmission Line Project (Project) contains the information required by Minnesota law. Accordingly, Applicants respectfully request that the Commission determine that the Application is complete. With respect to the process by which the Application should be considered, as discussed in Section I below, the Applicants request that the Commission stay the Certificate of Need Application and process it jointly with the Route Permit Application, which Applicants intend to submit this fall.

**BACKGROUND**

Prior to filing the Application, the Applicants submitted their Request for Exemption from Certain Certificate of Need Application Content Requirements (Exemption Requests), in which the Applicants identified application content requirements that were not relevant to the Project

and/or for which the Applicants proposed to provide alternative information.<sup>1</sup> The Exemption Requests were unopposed, and the Commission approved the Exemption Requests on December 23, 2025.<sup>2</sup>

On February 6, 2026, the Applicants filed the Application.<sup>3</sup> The Application included a completeness checklist (Appendix A) that identified where in the Application the information required by statute, rule, and/or exemption was located.<sup>4</sup> Thereafter, the Commission issued the Notice requesting initial comments by February 25, 2026; reply comments by March 4, 2026; and supplemental comments by March 9, 2026.<sup>5</sup> The Notice requested comments on the following topics:

- Does the Application contain the information required under Minn. R. 7849.0220, subp. 2?
- Are there any contested issues of fact with respect to the representations made in the Application?
- Should the Application be evaluated using the Commission’s informal process or referred to the Court of Administrative Hearings for contested case proceedings?
- Are there any additional issues or concerns related to this matter?

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<sup>1</sup> Request for Exemption from Certain Certificate of Need Application Content Requirements, eDockets No. [202510-223688-03](#) (Oct. 8, 2025).

<sup>2</sup> Order Approving Exemption Requests and Notice Plan, eDockets No. [202512-226131-01](#) (Dec. 23, 2025).

<sup>3</sup> Certificate of Need Application, Appendices A-H, and Summary of Application (Application), eDockets Nos. [20262-227902-02](#), [20262-227902-03](#), [20262-227902-04](#), [20262-227902-05](#), [20262-227902-06](#), [20262-227902-07](#), [20262-227902-08](#), [20262-227902-09](#), [20262-227902-10](#), [20262-227902-11](#), [20262-227902-12](#), [20262-227902-13](#), [20262-227902-14](#), [20262-227902-15](#) (Feb. 6, 2026).

<sup>4</sup> Application, Appendix A – Completeness Checklist, [20262-227902-03](#) (Feb. 6, 2026).

<sup>5</sup> Notice of Comment Period on Application Completeness, [20262-228041-01](#) (Feb. 11, 2026).

Prior to the close of the initial comment period, comments were submitted by: Energy Infrastructure Permitting (EIP) Staff;<sup>6</sup> Department of Commerce, Division of Energy Resources (DOC-DER);<sup>7</sup> Houston County Board of Commissioners (Houston County);<sup>8</sup> Zumbro Township;<sup>9</sup> Viola Township;<sup>10</sup> Midcontinent Independent System Operator, Inc. (MISO);<sup>11</sup> Minnesota Center for Environmental Advocacy, Citizens Utility Board of Minnesota, Sierra Club, Clean Grid Alliance, and Fresh Energy (Joint Commenters);<sup>12</sup> North Route Group and NO765Line (Legalelectric Groups);<sup>13</sup> and members of the public. The Applicants respond to these comments below.

## **REPLY**

### **I. Joint Processing of Certificate of Need & Route Permit Applications**

Some commenters requested that the Commission conduct joint proceedings for the Certificate of Need Application and forthcoming Route Permit Application. The Applicants intend to file a Route Permit Application in Fall 2026. Given this timing, the Applicants agree that a joint

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<sup>6</sup> EIP Staff Comments on Application Completeness and Rule Variance, eDockets No. [20262-228571-01](#) (Feb. 24, 2026) (hereinafter, EIP Staff Comments).

<sup>7</sup> DOC-DER Comments on Application Completeness, eDockets No. [20262-228651-01](#) (Feb. 25, 2026) (hereinafter, DOC-DER Comments).

<sup>8</sup> Houston County Board of Commissioners' Comments, eDockets No. [20262-228539-01](#) (Feb. 24, 2026) (hereinafter, Houston County Comments).

<sup>9</sup> Zumbro Township Board Comments, eDockets No. [20262-227995-03](#) (Feb. 10, 2026) (hereinafter, Zumbro Township Comments).

<sup>10</sup> Viola Township Board Comments, eDockets No. [20262-228696-01](#) (Feb. 26, 2026) (hereinafter, Viola Township Board Comments).

<sup>11</sup> MISO Comments on Application Completeness, eDockets No. [20262-228623-01](#) (Feb. 25, 2026) (hereinafter, MISO Comments).

<sup>12</sup> Joint Commenters' Comments on Application Completeness, eDockets No. [20262-228647-01](#) (Feb. 25, 2026) (hereinafter, Joint Commenters' Comments).

<sup>13</sup> Legalelectric Groups Comments on Application Completeness, eDockets No. [20262-228609-01](#) (Feb. 25, 2026) (hereinafter, Legalelectric Groups Comments).

hearing is feasible and efficient and request that the Commission hold a joint hearing pursuant to Minn. Stat. § 216B.243, subd. 4.

Because the Certificate of Need Application will be stayed until Fall 2026, the Applicants respectfully submit that it is not necessary for the Commission to decide at this time whether the Certificate of Need will proceed under the informal process or be referred to a contested case. Rather, such a decision should be made after the Route Permit Application is filed to ensure consistent proceedings and reduce public confusion. In any event, the Route Permit Application will proceed under the Major Review process and will allow ample opportunity for public participation, record development regarding route alternatives, and the preparation of an Environmental Impact Statement (EIS) – the topics which appear to be of primary interest to members of the public at this time.

## **II. EIP Staff**

EIP Staff concludes that the Application includes the environmental information required by Minn. R. 7849.0310.<sup>14</sup> EIP Staff also requests that the Commission vary Minn. R. 7849.1200 and 7849.1400 to recognize that EIP Staff, not the Department of Commerce, will prepare the environmental report in this proceeding.<sup>15</sup> The Applicants appreciate EIP Staff’s review of the Application and agree with EIP Staff’s comments, including the requested variance.

## **III. DOC-DER**

In its initial comments, DOC-DER provides background on the Project, including its development as part of MISO’s Long Range Transmission Planning (LRTP) Tranche 2.1 Portfolio.<sup>16</sup> With respect to completeness, DOC-DER states that it “finds the petition includes

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<sup>14</sup> EIP Staff Comments at 1, eDockets No. [20262-228571-01](#) (Feb. 24, 2026).

<sup>15</sup> EIP Staff Comments at 1-2, eDockets No. [20262-228571-01](#) (Feb. 24, 2026).

<sup>16</sup> DOC-DER Comments at 2-3, eDockets No. [20262-228651-01](#) (Feb. 25, 2026).

information that addresses Minnesota Rule chapter 7849.0220, Subp. 2 and recommends declaring the application substantially complete.”<sup>17</sup> The Applicants appreciate DOC-DER’s review of the Application and agree with this recommendation.

Elsewhere in its initial comments, DOC-DER identifies additional questions and/or topics regarding the Project.<sup>18</sup> It is unclear to the Applicants when DOC-DER is requesting that the Applicants respond to the questions posed in DOC-DER’s comments. The questions and topics identified by DOC-DER are not application content requirements under Minn. R. 7849.0220, subp. 2. The Applicants are committed to working with DOC-DER to continue to develop this record but note that many of the topics raised in DOC-DER’s comments would require additional substantive analysis that is not currently available. For example, DOC-DER asks Applicant, “[w]hat 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?”<sup>19</sup> Likewise, some of the other topics/questions raised by DOC-DER go to the merits of the Application that may be developed in this record and/or issues that are better addressed in other dockets or forums.

The Applicant’s review of DOC-DER’s initial comments identified three items which it appears DOC-DER requests be provided during this completeness comment period, and Applicants provide that information with these Reply Comments.<sup>20</sup>

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<sup>17</sup> DOC-DER Comments at 9, eDockets No. [20262-228651-01](#) (Feb. 25, 2026).

<sup>18</sup> DOC-DER Comments at 4-9, eDockets No. [20262-228651-01](#) (Feb. 25, 2026).

<sup>19</sup> DOC-DER Comments at 6, eDockets No. [20262-228651-01](#) (Feb. 25, 2026).

<sup>20</sup> In addition, DOC-ER recommended that Applicants “clarify that ‘double-circuit’ modifies the 161 kv, not the 765 kV portion of the line.” (DOC-DER Comments at 6.) This is inaccurate. As described in Section 2.1 and depicted in Appendix C.2 of the Application and elsewhere, Segment 2 of the Project is proposed as double-circuit 765 kV/161 kV, not 765 kV and double-circuit 161 kV/161 kV.

First, DOC-DER asks the Applicants to ensure that the completeness checklist matches the location of the information or data in the Application.<sup>21</sup> The Applicants have reviewed the completeness checklist provided as Appendix A to the Application, and an updated version is included as **Attachment A** to these comments. The updated version includes minor corrections and clarifications (*i.e.*, more specific subsection references).

Second, DOC-DER asks the Applicants to provide “a simple table listing the counties” in the Project Notice Area. Table 1, below, lists the counties in the Project Notice Area.<sup>22</sup>

<b>Table 1 Counties in Project Notice Area<sup>23</sup></b>
Goodhue
Wabasha
Olmsted
Mower
Fillmore
Houston

Third, DOC-DER requests certain clarifications regarding Appendix D, which includes Xcel Energy’s annual revenue requirement for the Project.<sup>24</sup> As an initial matter, the Appendix D included in the Application is consistent with the Exemption Requests approved by the Commission, as well as prior similar filings.<sup>25</sup> Regardless, to aid in the public’s review of the Application, an updated cover page to Appendix D that includes explanations regarding what is

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<sup>21</sup> DOC-DER Comments at 5, eDockets No. [20262-228651-01](#) (Feb. 25, 2026).

<sup>22</sup> DOC-DER Comments at 6, eDockets No. [20262-228651-01](#) (Feb. 25, 2026).

<sup>23</sup> List includes counties entirely or partially within Project Notice Area, moving approximately from northwest to southeast.

<sup>24</sup> DOC-DER Comments at 7-8, eDockets No. [20262-228651-01](#) (Feb. 25, 2026).

<sup>25</sup> See *In the Matter of Mankato – Mississippi River Transmission Project Certificate of Need and Route Permit Application*, eDockets No. E002/CN-22-532 & E002/TL-23-157, Appendix J – Ratepayer Impacts (Apr. 2, 2024); *Big Stone South – Alexandria – Big Oaks 345 kV Transmission Project Certificate of Need Application*, eDocket No. CN-22-538, Appendix H – Xcel Energy Rate Impacts Calculations (Sept. 29, 2023).

depicted in each table is included as **Attachment B** to these Reply Comments.<sup>26</sup> With respect to DOC-DER’s request for clarification on the “derivations of these numbers” and how the revenue requirement costs included in Appendix D related to the costs presented in Section 2.5 of the Application, as an initial matter, there are two values presented in Appendix D—the low (Appendix D, page 2) and the high (Appendix D, page 9) capital cost scenarios for the Project, consistent with how Xcel Energy presents cost ranges in Certificate of Need filings. The revenue requirement model applies the same methodology, financial assumptions, depreciation lives, jurisdictional allocators, and tax inputs to both scenarios. Only the initial capital cost inputs differ. Further, the revenue requirement figures reflect the present value of the costs recovered through rates including utility-owned assets, depreciation, operations and maintenance, and carrying cost. The overall Project cost, however, represents the total nominal investment for the full initiative. Because the revenue requirement is a present-value calculation of only recoverable costs, the values in Appendix D will not match the Project costs presented in Section 2.5 of the Application.

#### **IV. Local Government Units**

##### **A. Houston County**

The Houston County Board of Commissioners submitted comments and a resolution expressing opposition to the Project and requesting an EIS, detailed evaluation of alternatives, opportunity for local government participation, and analysis of local benefits.<sup>27</sup> The Applicants appreciate Houston County’s participation in this proceeding and anticipate that the topics and issues raised in the County’s comments and resolution will be evaluated as part of the

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<sup>26</sup> The contents of Appendix D are unchanged.

<sup>27</sup> Houston County Comments, eDockets No. [20262-228539-01](#) (Feb. 24, 2026).

Commission's consideration of the Project. The Applicants will continue to coordinate with the County during route development, permitting, and beyond.<sup>28</sup>

#### **B. Zumbro Township & Viola Township**

Zumbro Township and Viola Township provide comments regarding the routing of the Project.<sup>29</sup> The Applicants appreciate the Townships' participation in this docket and will consider the Townships' comments in the Applicants' route development process.

#### **V. MISO**

MISO's comments provide background on the development of LRTP Tranche 2.1, summarize benefits to Minnesota and the region, and indicate support for evaluation of the Application using the Commission's informal process.<sup>30</sup> The Applicants appreciate MISO's comments and agree with its discussion of the merits of Tranche 2.1.

#### **VI. Joint Commenters**

Joint Commenters recommend review of the Application using the Commission's informal process, noting that the need for and benefit of the Project have been well-documented as part of the LRTP Tranche 2.1 development process.<sup>31</sup> The Applicants appreciate Joint Commenters' participation in this docket and recognition of the merits of the Project.

#### **VII. Legalectric Groups**

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<sup>28</sup> Section 3 of Houston County's resolution requested that the Applicants provide certain detailed and substantive information to the County related to a variety of topics by April 30, 2026. The factual record related to this Project will be developed in the Commission proceedings. To maintain the integrity of this record and avoid later confusion, the Applicants encourage Houston County to continue to participate in the Commission's docket, as the County has indicated it will do.

<sup>29</sup> Zumbro Township Comments, eDockets No. [20262-227995-03](#) (Feb. 10, 2026); Viola Township Comments, eDockets No. [20262-228696-01](#) (Feb. 26, 2026).

<sup>30</sup> MISO Comments, eDockets No. [20262-228623-01](#) (Feb. 25, 2026).

<sup>31</sup> Joint Commenters' Comments, eDockets No. [20262-228647-01](#) (Feb. 25, 2026).

The Legalectric Groups<sup>32</sup> submitted comments asserting that: (1) the Commission should have mailed notice of the completeness comment period to landowners in the Notice Area; (2) the Application “arguably” contains the required information, but the Commission should have granted fewer or different exemptions from the content requirements; and (3) there are contested issues of fact warranting a contested case proceeding, rather than the Commission’s informal process.<sup>33</sup> The Applicants address each argument in turn below.

*1. Mailed Notice of Completeness Comment Period.*

The Legalectric Groups assert that the Commission should have mailed notice of the completeness comment period to all landowners in the Notice Area.<sup>34</sup> The Legalectric Groups cite no support for this argument, and there is none. Members of the public in the Notice Area received notice of the Project through the Applicants’ implementation of their Notice Plan. That notice included information about how to subscribe to and participate in the docket.<sup>35</sup> Likewise, landowners and residents in the Notice Area will receive notice of the scoping meetings and public hearings, where substantive comments on the Project are sought. There is no separate requirement to mail notice of the completeness comment period.

Separately, the Legalectric Groups complain about the newspapers in which the Applicants’ Notice Plan notice was published, asserting that notice should also have been

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<sup>32</sup> The representative for the North Route Group is identified as Suzanne Tomek, who also submitted comments on her own behalf. Because Tomek’s comments address largely the same issues as those discussed in the Legalectric Groups’ comments, the Applicants do not discuss them separately.

<sup>33</sup> Legalectric Groups Comments, eDockets No. [20262-228609-01](#) (Feb. 25, 2026).

<sup>34</sup> Legalectric Groups Comments at 8, eDockets No. [20262-228609-01](#) (Feb. 25, 2026). Other commenters also expressed concern about not receiving direct mail notice of the completeness comment period, and the Applicants do not separately respond to those comments.

<sup>35</sup> Notice Plan Compliance Filing at 7, eDockets No. [20262-227889-01](#) (Feb. 5, 2026). *See also*, Notice Plan Compliance Filing – Corrected Attachment B, eDockets No. [20262-228535-01](#) (Feb. 24, 2026).

published in the Zumbrota News-Record and the Red Wing Republican Eagle.<sup>36</sup> This argument is untimely. The Applicants filed their Notice Plan Petition on October 8, 2025, and the Commission opened a comment period and requested three rounds of comments on the Petition.<sup>37</sup> No objections to the Petition were raised, and it was approved on the Commission’s consent agenda on December 23, 2025.<sup>38</sup> Likewise, thereafter, no objections were raised within the 10-day timeframe in which to do so. There is no dispute that this Project and proceeding have been well-publicized, and it is now too late to nitpick the Notice Plan newspaper list.<sup>39</sup>

## 2. *Application Content & Exemptions.*

Next, the Legalectric Groups acknowledge that the Application “arguably contains the information required as exempted by the Commission’s Order,” but assert that the Commission should have granted fewer or different exemptions.<sup>40</sup> Arguments challenging the granted exemptions, too, are untimely. After the Applicants filed their Exemption Requests on October 8, 2025, the Commission opened a comment period and requested comments regarding the Exemption Requests.<sup>41</sup> The Commission accepted three rounds of comments (initial, reply, and supplemental). If there was a dispute about the Exemption Requests, it should have been raised at

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<sup>36</sup> Legalectric Groups Comments at 8, eDockets No. [20262-228609-01](#) (Feb. 25, 2026).

<sup>37</sup> Notice of Comment Period on Notice Plan Petition and Exemption Request for Exemption from Certain Certificate of Need Application Content Requirements, eDockets No. [202510-223937-01](#) (Oct. 15, 2025) (hereinafter Notice of Comment Period on Notice Plan and Exemption Request).

<sup>38</sup> Order Approving Exemption Requests and Notice Plan, eDockets No. [202512-226131-01](#) (Dec. 23, 2025).

<sup>39</sup> The Legalectric Groups also discuss the Notice Plan landowner mailing list. The Applicants filed a corrected and complete landowner mailing list on February 24, 2026. Although the previously-filed version of the compliance filing mailing list had inadvertently excluded recipients, this was a filing error, and the Applicants sent notice to the complete landowner mailing list prior to filing the Application.

<sup>40</sup> Legalectric Groups Comments at 8-10, eDockets No. [20262-228609-01](#) (Feb. 25, 2026).

<sup>41</sup> Notice of Comment Period on Notice Plan and Exemption Request, eDockets No. [202510-223937-01](#) (Oct. 15, 2025).

that time. However, no dispute was raised, and the Exemption Requests were approved on the Commission's consent agenda on December 23, 2025.<sup>42</sup> Even then, anyone disputing the approval had 10 days to file an objection to the order.<sup>43</sup> No objections were filed. It is too late to challenge the exemptions now and, as the Legalectric Groups note, the exemptions do not limit the information that could further be developed in this record for the Commission's consideration.<sup>44</sup>

### 3. *Contested Issues.*

The Legalectric Groups assert that there are contested issues of fact warranting a contested case proceeding.<sup>45</sup> As discussed previously, because this proceeding will be stayed until the Applicants submit a Route Permit Application in Fall 2026, the Applicants request that the Commission defer a decision on the procedural treatment of the Certificate of Need until that time. This will ensure consistency between the proceedings and reduce public confusion.

### 4. *Other Issues.*

Finally, the Legalectric Groups assert there are additional issues for the Commission's consideration in this matter, including review of system alternatives and environmental analysis.<sup>46</sup> The Applicants agree that this process will include analysis of system alternatives and environmental review.

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<sup>42</sup> Order Approving Exemption Requests and Notice Plan, eDockets No. [202512-226131-01](#) (Dec. 23, 2025).

<sup>43</sup> Order Approving Exemption Requests and Notice Plan at 2, eDockets No. [202512-226131-01](#) (Dec. 23, 2025).

<sup>44</sup> Legalectric Groups Comments at 10, eDockets No. [20262-228609-01](#) (Feb. 25, 2026).

<sup>45</sup> Legalectric Groups Comments at 15-16, eDockets No. [20262-228609-01](#) (Feb. 25, 2026).

<sup>46</sup> Legalectric Groups Comments at 35, eDockets No. [20262-228609-01](#) (Feb. 25, 2026).

## VIII. Individual Commenters

### A. Public Comments Regarding Merits of the Project

The majority of the comments submitted by members of the public were related to the merits of the Project, rather than completeness. More specifically, for example, members of the public submitted comments regarding:

- System alternatives;<sup>47</sup>
- Project routing and consideration of route alternatives;<sup>48</sup>
- The underlying need for the Project;<sup>49</sup>
- Sound<sup>50</sup> and electric and magnetic fields;<sup>51</sup> and
- Potential human and environmental impacts of the Project.<sup>52</sup>

The Applicants understand there is a high level of public interest in the Project, and the merits of the Project with respect to both need and routing will be further developed as this proceeding progresses.

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<sup>47</sup> See, e.g., Houston County Comments, eDockets No. [20262-228539-01](#) (Feb. 24, 2026); C. Weckwerth Comments, eDockets No. [20262-228629-01](#) (Feb. 25, 2026).

<sup>48</sup> See, e.g., Corrected North Route Group Comments, eDockets No. [20262-228660-01](#) (Feb. 25, 2026); K. Hammel Comments, eDockets No. [20262-228151-01](#) (Feb. 13, 2026).

<sup>49</sup> See, e.g., D. Ballinger Comments, eDockets No. [20262-228574-01](#) (Feb. 24, 20-26); Public Comments (Vrieze) at 4, eDockets No. [20262-228282-01](#) (Feb. 18, 2026); Public Comments (Heberlein) at 13, eDockets No. [20262-228222-01](#) (Feb. 17, 2026).

<sup>50</sup> See, e.g., W. Ben Johnson, M.D. Comments, eDockets No. [20262-228606-01](#) (Feb. 25, 2026). While these comments are extensive, they do not identify a completeness issue, but rather, seem to request that EIP Staff consider Project sound in scoping and environmental review. The comments also purport to include interrogatories under Minn. R. 1405.0800; however, that rule relates to siting and routing proceedings and is not applicable at this time. The Applicants will, of course, respond to valid discovery requests in the future in the Route Permit proceeding.

<sup>51</sup> See, e.g., C. Beckjord Comments, eDockets No. [20262-228578-03](#) (Feb. 24, 2026); Public Comments (Meyer) at 7-8, eDockets No. [20262-228222-02](#) (Feb. 17, 2026).

<sup>52</sup> See, e.g., T. Schmidt Comments, eDockets No. [20262-228480-01](#) (Feb. 23, 2026); Public Comments (Becker) at 12, eDockets No. [20262-228222-02](#) (Feb. 17, 2026); Public Comments (Treptow) at 9, eDockets No. [20262-228549-01](#) (Feb. 24, 2026).

**B. Dale Thomforde**

Dale Thomforde submitted comments describing a system alternative that would result in a radial line extending south from the North Rochester Substation.<sup>53</sup> The comments do not raise a completeness issue, and Applicants note that evaluation of system alternatives will be part of the forthcoming scoping process. As an initial matter, it appears that this is a system alternative with alternative endpoints and thus would not be studied under Minnesota law for this Project absent the Applicants' consent.<sup>54</sup> Further, the Applicants understand that, when studying Tranche 2.1, MISO determined that both the North Rochester and the Pleasant Valley Substations should have two 765 kV line sources to ensure a robust and resilient design. The alternative proposed by Thomforde does not do this. The Applicants anticipate providing a more detailed response to this and other system alternatives proposed during the scoping process in forthcoming comment periods.

**C. Kyle Johnson**

Kyle Johnson asserts that the Application should have considered a specific type of high-voltage direct current (HVDC) system alternative (a 525 kV HVDC line).<sup>55</sup> Similarly, Johnson asserts that the Application should consider an underground HVDC line and should “stay these proceedings and compel the applicants to submit a . . . analysis of an underground 525 kV alternative—specifically evaluating its co-location along existing transportation corridors—before any final determination is made.”<sup>56</sup>

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<sup>53</sup> Thomforde System Alternative Comments, eDockets No. [20262-227942-01](#) (Feb. 9, 2026).

<sup>54</sup> See Minn. Stat. § 216B.243, subd. 3(6).

<sup>55</sup> K. Johnson Comments at 1, eDockets No. [20262-228473-01](#) (Feb. 23, 2026).

<sup>56</sup> K. Johnson Comments at 13, eDockets No. [20262-228473-01](#) (Feb. 23, 2026).

Although the comments are, at times, framed in terms of completeness, the comments overall assert that HVDC is a superior alternative to the Project. That is not a completeness issue, and the merits of the Project as compared to other alternatives will be developed as part of this record. The Commission's rules require applications to include, among other things, a discussion of the following alternatives: a DC transmission line (if the proposed facility is alternating current (AC)); and an underground transmission line (if the proposed facility is an overhead transmission line).<sup>57</sup> The Application analyzes both alternatives as part of its extensive alternatives analysis, including explaining why the Applicants are not proposing HVDC for the Project:

As a general rule, HVDC becomes a cost-effective alternative to AC transmission when the line length is greater than 260 miles and high transfer capability is needed. As detailed in Section 1.2.1, the Studied Projects is made up of a series of individual facilities, each providing delivery points between generation and demand. The Studied Project's longest line, between the Lakefield Junction Substation and the Pleasant Valley Substation, is 130 miles, which is much shorter than the threshold for which HVDC is cost effective.<sup>58</sup>

The Application likewise discussed the Applicants' evaluation of an underground transmission line as an alternative to the Project as proposed.<sup>59</sup> If proposed during the forthcoming scoping period, an HVDC alternative (lower- or higher-voltage and above- or below-ground) may be considered further in this record, but the Applicants respectfully submit that the alternatives analysis in the Application satisfies the Commission's content requirements.

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<sup>57</sup> Minn. R. 7849.0260.

<sup>58</sup> Application § 7.4.4, eDockets No. [20262-227902-02](#) (Feb. 23, 2026).

<sup>59</sup> Application § 7.4.5, eDockets No. [20262-227902-02](#) (Feb. 23, 2026).

**D. Craig Weckwerth<sup>60</sup>**

Craig Weckwerth submitted comments asserting that the Application is incomplete for multiple reasons.<sup>61</sup> Although the Applicants appreciate Weckwerth’s detailed review of the Application, the Applicants disagree that the Application is incomplete, as detailed below.

<b>Comment</b>	<b>Applicants’ Response</b>
Application “does not include a map of all existing high-voltage lines in Minnesota and the affected region. Such a map should include generation sources and power flows.” <sup>62</sup>	The Application was required to include a map depicting high voltage transmission lines within the Notice Area. That map was included as Figure 10.6-1 in the Application.
“It does not address the possibility of closing coal plants and the effect on transmission capacity.” <sup>63</sup>	This is not a completeness requirement and, regardless, the analysis conducted by MISO and the Applicants did take into consideration planned generator retirements. <sup>64</sup>
“It does not consider likely advances in distributive generation that will occur prior to the construction of transmission lines. Placing power sources close to the consumption of that power would reduce transmission loss, and distributive generation would prevent the concentration of risk in the proposed high-voltage lines.” <sup>65</sup>	Pursuant to Minn. R. 7849.0260(B)(1), the Application was required to discuss the alternative of “new generation of various technologies, sizes, and fuel types.” Consistent with that requirement, Section 7.3 of the Application evaluated generation and non-wire alternatives, including distributed generation.
“It does not demonstrate that new transmission lines are necessary instead of upgrading existing lines.” <sup>66</sup>	Consistent with Minn. R. 7849.0260(B)(2), Section 7.4.1 of the Application evaluated existing system upgrades.
“It does not adequately examine the possibility of underground DC lines vs overhead AC transmission.” <sup>67</sup>	See response to Kyle Johnson comments, above.

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<sup>60</sup> C. Weckwerth Comments, eDockets No. [20262-228440-01](#) (Feb. 23, 2026).

<sup>61</sup> Comments filed by Devon Ballinger raised substantially similar issues, and, as such, the Applicants do not address those comments separately.

<sup>62</sup> C. Weckwerth Comments, eDockets No. [20262-228440-01](#) (Feb. 23, 2026).

<sup>63</sup> C. Weckwerth Comments, eDockets No. [20262-228440-01](#) (Feb. 23, 2026).

<sup>64</sup> Application § 5.2, eDockets No. [20262-227902-02](#) (Feb. 23, 2026).

<sup>65</sup> C. Weckwerth Comments, eDockets No. [20262-228440-01](#) (Feb. 23, 2026).

<sup>66</sup> C. Weckwerth Comments, eDockets No. [20262-228440-01](#) (Feb. 23, 2026).

<sup>67</sup> C. Weckwerth Comments, eDockets No. [20262-228440-01](#) (Feb. 23, 2026).

Comment	Applicants' Response
"The application does not adequately consider the impact on wildlife." <sup>68</sup>	Minn. R. 7849.0330(G) identifies the required environmental information, and Section 10.4 of the Application discusses vegetation and wildlife. Additional environmental analysis will occur on specific route(s) during the Route Permit proceeding.

In short, Weckwerth's comments generally express disagreement with the conclusions presented in the Application, rather than identifying missing required information in the Application. The completeness determination is the beginning of this process, and the Applicants anticipate that issues related to the merits of the Project will be subject to full record development.

Weckwerth also expresses concern that initial notices about the Project did not identify proposed routes.<sup>69</sup> The notices provided were consistent with the Commission-approved Notice Plan, and future notices related to the Route Permit Application will include additional information about Project routing.

**E. Peter Kalvoda**

Peter Kalvoda asserts that the Application is incomplete because: (1) "a strong need case hasn't been made for Minnesota;" (2) the number of properties within the right-of-way was not included in the Application; and (3) additional information about right-of-way acquisition should be provided.<sup>70</sup> The comments do not identify any missing application content requirements, and issues identified by Kalvoda are not completeness issues and instead relate to the merits of the Project. These topics will be developed further as the Certificate of Need and Route Permit Application proceedings progress. In particular, the Applicants understand that issues related to

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<sup>68</sup> C. Weckwerth Comments, eDockets No. [20262-228627-01](#) (Feb. 25, 2026).

<sup>69</sup> C. Weckwerth Comment, eDockets No. [20262-228631-01](#) (Feb. 25, 2026).

<sup>70</sup> P. Kalvoda Comments at 27-30, eDockets No. [20262-228710-01](#) (Feb. 26, 2026).

easement acquisition and compensation are of interest and concern to landowners, and the Applicants are committed to regular and continuing communications with potentially affected landowners as part of the routing process.

**CONCLUSION**

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

Dated: March 4, 2026

*/s/ Lisa Agrimonti*

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Gopher to Badger Link Transmission Line Project  
Certificate of Need Application  
Completeness Checklist

Authority	Required Information	Location in Application	Exemption Requested
Minn. R. 7849.0200, subp. 6	Before submitting an application, a person is exempted from any data requirement of parts 7849.0010 to 7849.0400 if the person (1) requests an exemption from specified rules, in writing to the commission, and (2) shows that the data requirement is unnecessary to determine the need for the proposed facility or may be satisfied by submitting another document. A request for exemption must be filed at least 45 days before submitting an application.	Filed in Docket no. 25-121 on October 8, 2025  eDocket No. 202510-223688-03	
Minn. R. 7849.0220, Subp. 2	Each application for a certificate of need for an LHVTL shall include all of the information required by parts 7849.0240 and 7849.0260 to 7849.0340.	This Application	
Minn. R. 7829.2500, subp. 2	Brief summary of filing on separate page sufficient to apprise potentially interested parties of its nature and general content.	One-page summary	
Minn. R. 7849.0200, subp. 2	Title Page and Table of Contents	Table of Contents	
Minn. R. 7849.0200, subp. 4	Cover Letter	Cover Letter	
Minn. R. 7849.0220, subp. 3	Joint Ownership and Multiparty use	1.1; 1.3	
Minn. R. 7849.0230	Designation of certain information included in a Certificate of Need application be considered a "Draft environmental report"		Exemption requested; Applicants comply with the environmental review process set forth in Minn. R. 7849.1000-.2100
Minn. R. 7849.0240	Need summary and additional considerations	—	
Subp. 1	Summary of the major factors that justify the need for the proposed facility	1.4; 1.5	
Subp. 2	Relationship of the proposed facility to the following socioeconomic considerations:	—	
A.	Socially beneficial uses of the output of the facility, including its uses to protect or enhance environmental quality;	1.5.3; 6.5.3	
B.	Promotional activities that may have given rise to the demand for the facility; and	6.8	

Authority	Required Information	Location in Application	Exemption Requested
C.	Effects of the facility in inducing future development.	6.9	
Minn. R. 7849.0260	Proposed LHVTL and Alternatives	—	
A.	A description of the type and general location of the proposed line, including:	—	
(1)	Design voltage;	2.1	
(2)	Number, sizes and types of conductors;	2.2.3	
(3)	Expected losses under projected maximum loading and under projected average loading in the length of the line and at terminals or substations;		Exemption requested; substitute information included in Section 6.6.3
(4)	Approximate length of the proposed line;	1.2.1	
(5)	Approximate locations of DC terminals or AC substations on a map; and	Figure 1.8-1 and Section 2.4	
(6)	List of likely affected counties.	Figure 1.8-1; 10.1	
B.	Discussion of the available alternatives including:	—	
(1)	New generation of various technologies, sizes, and fuel types;	7.3; Table 1.6-1	
(2)	Upgrading existing transmission lines;	7.4.1	
(3)	Transmission lines with different voltages or conductor arrays;	7.2	
(4)	Transmission lines with different terminals or substations;		Full exemption requested
(5)	Double circuiting of existing transmission lines;	7.4.3	
(6)	If facility for DC (AC) transmission, an AC (DC) transmission line;	7.4.4	
(7)	If proposed facility is for overhead (underground) transmission, an underground (overhead) transmission line; and	7.4.5	
(8)	Any reasonable combination of alternatives (1) – (7).	7.5	Exemption requested from analysis of transmission lines with end points different than those identified by MISO
C.	For the proposed facility and for each of the alternatives provided in response to item B that could provide electric power at the asserted level of need, a discussion of:	—	
(1)	Total cost in current dollars;	2.5; Ch. 7	
(2)	Service life;	3.4.3; Ch. 7	

Authority	Required Information	Location in Application	Exemption Requested
(3)	Estimated average annual availability;	9.5	
(4)	Estimated annual O&M costs in current dollars;	2.5.2	
(5)	Estimate of its effect on rates system wide and in Minnesota assuming a test year beginning with the proposed in-service date;		Exemption requested; substitute information included in Chapter 2
(6)	Its efficiency, expressed for a transmission facility as the estimated losses under projected maximum loading and under projected average loading in the length of the transmission line and at the terminals or substations; and		Exemption requested; substitute information included in Section 6.6.3
(7)	Major assumptions made in subitems (1) – (6)	1.6; 2.5; 6.2.1; 7.1	
D.	A map (of appropriate scale) showing the applicant's system or load center to be served by the proposed LHVTL.		Exemption requested; substitute information included in Figure 1.8-1
E.	Such other information about the proposed facility and each alternative as may be relevant to determination of need.	This Application	
Minn. R. 7849.0270	Peak Demand and Annual Consumption Forecasts		Exemption requested; substitute information included in Chapters 1, 2, 5, 6, and Appendices D, E, and F
Subp. 1	Peak demand and annual consumption data within the applicant's service area and system		
Subp. 2	The following data for each forecast year:		
A.	Annual consumption by ultimate consumers within applicants' Minnesota service area;		
B.	Estimates of total ultimate consumers and their annual consumption for each of the following consumer categories:		
	Farm;		
	Irrigation and drainage pumping;		
	Nonfarm residential;		

Authority	Required Information	Location in Application	Exemption Requested
	Commercial;		
	Mining;		
	Industrial;		
	Street and highway lighting;		
	Electrified transportation;		
	Other (including municipal water pumping, oil/gas pipeline pumping, military, all other consumers not reported in subitems (1)-(8)); and		
	Sum of subitems (1)-(9);		
C.	An estimate of the demand for power in the applicant's system at the time of annual system peak demand, including an estimated breakdown of the demand into the consumer categories listed in item B;		
D.	Applicant's system peak demand by month;		
E.	Estimated annual revenue requirement/kWh for system in current dollars; and		
F.	Applicant's estimated average system weekday load factor by month;		
Subp. 3	Detail of forecast methodology employed, including:		
A.	Overall methodological framework that is used;		
B.	Specific analytical techniques used, their purpose, and components to which they were applied;		
C.	Manner in which specific techniques relate to forecast;		
D.	Where statistical techniques have been used:		
(1)	Purpose of technique;		
(2)	Typical computations, specifying variables and data; and		
(3)	Results of appropriate statistical tests;		
E.	Forecast confidence levels/ranges of accuracy for annual peak demand and consumption, and description of their derivation;		
F.	Brief analysis of methodology used, including		
	Strengths and weaknesses;		
	Suitability to the system;		
	Cost considerations;		

Authority	Required Information	Location in Application	Exemption Requested
	Data requirements;		
	Past accuracy; and		
	Other significant factors.		
G.	Explanation of discrepancies between application's forecast and applicant forecasts in other proceedings.		
Subp. 4	Data base used in forecast, including:		
A.	Complete list of all data used in forecast, including a brief description of each and how it was obtained;		
B.	Clear identification of any adjustments to raw data to adapt them for use in forecasting, including:		
	Nature of adjustment;		
	Reason for adjustment; and		
	Magnitude of adjustment		
Subp. 5	Essential forecast assumptions made regarding:		
A.	Availability of alternate sources of energy;		
B.	Expected conversion from other fuels to electricity or vice versa;		
C.	Future electricity prices in applicant's system and their effect on system demand;		
D.	Subpart 2 data that is not available historically nor created by applicant for forecast;		
E.	Effect of conservation programs on long-term demand; and		
F.	Any factor considered in preparing forecast.		
Subp. 6	Coordination of Forecasts		
A.	Extent of coordination of load forecasts with those of other systems	Ch. 5; Appendix F	
B.	Description of the manner in which those forecasts are coordinated	Ch. 3; Ch. 5; Appendix F	
Minn. R. 7849.0280	System Capacity Description		
A.	A brief discussion of power planning programs, including criteria, applied to the applicant's system and to the power pool or area within which the applicant's planning studies are based.	1.4.2; 5.1; 5.2; 5.3; 6.2.1; 6.6	
B.	Brief discussion of power planning programs applied to applicant's system;		Full exemption requested
C.	Applicant's seasonal firm participation purchases/sales for each utility involved in each transaction for each forecast year;		Full exemption requested

Authority	Required Information	Location in Application	Exemption Requested
D.	Load and generation capacity data for sub-items below for summer and winter seasons for each forecast year, including anticipated purchases, sales, and capacity retirements/additions:		Full exemption requested
	Seasonal system demand;		
	Annual system demand;		
	Total seasonal firm purchases;		
	Total seasonal firm sales;		
	Seasonal adjusted net demand;		
	Annual adjusted net demand;		
	Net generating capacity;		
	Total participation purchases;		
	Total participation sales;		
	Adjusted net capability;		
	Net reserve capacity obligation;		
	Total firm capacity obligation; and		
	Surplus or deficit capacity.		
E.	Load and generation capacity data requested in item D/sub-items (1)-(13) for summer and winter seasons for each forecast year subsequent to the year of application, including purchases, sales, and generating capability contingent on the proposed facility;		Full exemption requested
F.	Load and generation capacity data requested in item D/sub-items (1)-(13) for summer and winter seasons for each forecast year subsequent to the year of application, including all projected purchases, sales, and generating capability;		Full exemption requested
G.	List of proposed additions/retirements in net generating capability for each forecast year subsequent to the year of application;		Full exemption requested
H.	Graph showing monthly adjusted net demand, monthly adjusted net capability, and difference between adjusted net capability and actual, planned, or estimated maintenance outages of generation/ transmission for specified time periods; and		Full exemption requested
I.	Discussion of method and appropriateness of determining system reserve margins.		Full exemption requested

Authority	Required Information	Location in Application	Exemption Requested
Minn. R. 7849.0290	Conservation Programs		Exemption requested; substitute information included in Chapters 5 and 7.3.6, and Appendix E and G
A.	Name of committee, department, individual responsible for applicant's energy conservation/efficiency programs, including load management;		
B.	List of applicant's conservation/efficiency goals and objectives;		
C.	Description of specific energy conservation/efficiency programs considered, a list of those implemented, and reasons why other programs have not been implemented;		
D.	Description of major energy conservation/efficiency accomplishments by applicant;		
E.	Description of applicant's energy conservation/efficiency plans through the forecast years; and		
F.	Quantification of how energy conservation/efficiency programs affect the 7849.0270, subp. 2 forecast, a list of total program costs, and discussion of expected program effects in reducing need for new generation and transmission.		
Minn. R. 7849.0300	Consequence of Delay (three levels of demand)		Exemption requested; substitute information included in Chapters 6.7 and 7.7
Minn. R. 7849.0310	Required Environmental Information	Chapter 10	
Minn. R. 7849.0330	Transmission Facilities	—	
	Data for each alternative that would require LHVTL construction including:	—	
A.	For overhead transmission lines	—	
(1)	Schematics showing dimensions of support structures and conductor configurations for each type of support structure that may be used;	2.2.2; Appendix C	

Authority	Required Information	Location in Application	Exemption Requested
(2)	Discussion of the strength and distribution of the electric field attributable to the transmission facility, including the contribution of air ions if appropriate;	8.6	
(3)	Discussion of ozone and nitrogen oxide emissions;	8.2	
(4)	Discussion of radio and television interference; and	8.4	
(5)	Discussion of audible noise;	8.3	
B.	For underground transmission facilities:	N/A	
(1)	Types and dimensions of cable systems	N/A	
(2)	Types and qualities of cable system materials	N/A	
(3)	Heat released in kW per foot of cable	N/A	
C.	Estimated right-of-way required for the facility	1.2.1; Figure 1.6-1; 9.2	
D.	Description of construction practices	9.3; 9.4	
E.	Description of O&M practices	9.5; 9.6	
F.	Estimated workforce required for construction and O&M	2.5.2; 2.7	
G.	Description of region between endpoints in likely area for routes emphasizing a three mile radius of endpoints including:		Exemption requested; substitute information included in Chapter 10
(1)	Hydrological features		
(2)	Vegetation and wildlife		
(3)	Physiographic regions		
(4)	Land use types		
Minn. R. 7849.0340	No-Facility Alternative (three levels of demand)		Exemption requested; substitute information included in Sections 6.7 and 7.7

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Authority	Required Information	Location in Application	Exemption Requested
Minn. R. 7849.0200, subp. 6	Before submitting an application, a person is exempted from any data requirement of parts 7849.0010 to 7849.0400 if the person (1) requests an exemption from specified rules, in writing to the commission, and (2) shows that the data requirement is unnecessary to determine the need for the proposed facility or may be satisfied by submitting another document. A request for exemption must be filed at least 45 days before submitting an application.	Filed in Docket no. 25-121 on October 8, 2025  eDocket No. 202510-223688-03	
Minn. R. 7849.0220, Subp. 2	Each application for a certificate of need for an LHVTL shall include all of the information required by parts 7849.0240 and 7849.0260 to 7849.0340.	This Application	
Minn. R. 7829.2500, subp. 2	Brief summary of filing on separate page sufficient to apprise potentially interested parties of its nature and general content.	One-page summary	
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Minn. R. 7849.0200, subp. 4	Cover Letter	Cover Letter	
Minn. R. 7849.0220, subp. 3	Joint Ownership and Multiparty use	1.1; 1.3	
Minn. R. 7849.0230	Designation of certain information included in a Certificate of Need application be considered a "Draft environmental report"		Exemption requested; Applicants comply with the environmental review process set forth in Minn. R. 7849.1000-.2100
Minn. R. 7849.0240	Need summary and additional considerations	—	
Subp. 1	Summary of the major factors that justify the need for the proposed facility	1.4; 1.5	
Subp. 2	Relationship of the proposed facility to the following socioeconomic considerations:	—	
A.	Socially beneficial uses of the output of the facility, including its uses to protect or enhance environmental quality;	<a href="#">1.5.3</a> ; 6.5.3	
B.	Promotional activities that may have given rise to the demand for the facility; and	6.8	

Authority	Required Information	Location in Application	Exemption Requested
C.	Effects of the facility in inducing future development.	6.9	
Minn. R. 7849.0260	Proposed LHVTL and Alternatives	—	
A.	A description of the type and general location of the proposed line, including:	—	
(1)	Design voltage;	2.1	
(2)	Number, sizes and types of conductors;	2.2.3	
(3)	Expected losses under projected maximum loading and under projected average loading in the length of the line and at terminals or substations;		Exemption requested; substitute information included in Section <a href="#">6.6.46.6.3</a>
(4)	Approximate length of the proposed line;	1.2.1	
(5)	Approximate locations of DC terminals or AC substations on a map; and	Figure 1.8-1 and Section 2.4	
(6)	List of likely affected counties.	<del>4.2</del> <a href="#">Figure 1.8-1</a> ; <del>2.0</del> <a href="#">10.1</a>	
B.	Discussion of the available alternatives including:	—	
(1)	New generation of various technologies, sizes, and fuel types;	7.3; <a href="#">Table 1.6-1</a>	
(2)	Upgrading existing transmission lines;	7.4.1	
(3)	Transmission lines with different voltages or conductor arrays;	7.2	
(4)	Transmission lines with different terminals or substations;		Full exemption requested
(5)	Double circuiting of existing transmission lines;	7.4.3	
(6)	If facility for DC (AC) transmission, an AC (DC) transmission line;	7.4.4	
(7)	If proposed facility is for overhead (underground) transmission, an underground (overhead) transmission line; and	7.4.5	
(8)	Any reasonable combination of alternatives (1) – (7).	7.5	Exemption requested from analysis of transmission lines with end points different than those identified by MISO
C.	For the proposed facility and for each of the alternatives provided in response to item B that could provide electric power at the asserted level of need, a discussion of:	—	
(1)	Total cost in current dollars;	2.5; Ch. 7	

Authority	Required Information	Location in Application	Exemption Requested
(2)	Service life;	3.4.3; Ch. 7	
(3)	Estimated average annual availability;	9.5	
(4)	Estimated annual O&M costs in current dollars;	2.5.2	
(5)	Estimate of its effect on rates system wide and in Minnesota assuming a test year beginning with the proposed in-service date;		Exemption requested; substitute information included in Chapter 2
(6)	Its efficiency, expressed for a transmission facility as the estimated losses under projected maximum loading and under projected average loading in the length of the transmission line and at the terminals or substations; and		Exemption requested; substitute information included in Section <a href="#">6.6.46.6.3</a>
(7)	Major assumptions made in subitems (1) – (6)	1.6; 2.5; 6.2.1; 7.1	
D.	A map (of appropriate scale) showing the applicant's system or load center to be served by the proposed LHVTL.		Exemption requested; substitute information included in Figure 1.8-1
E.	Such other information about the proposed facility and each alternative as may be relevant to determination of need.	This Application	
Minn. R. 7849.0270	Peak Demand and Annual Consumption Forecasts		Exemption requested; substitute information included in Chapters 1, 2, 5, 6, and Appendices D, E, and F
Subp. 1	Peak demand and annual consumption data within the applicant's service area and system		
Subp. 2	The following data for each forecast year:		
A.	Annual consumption by ultimate consumers within applicants' Minnesota service area;		
B.	Estimates of total ultimate consumers and their annual consumption for each of the following consumer categories:		
	Farm;		
	Irrigation and drainage pumping;		

Authority	Required Information	Location in Application	Exemption Requested
	Nonfarm residential;		
	Commercial;		
	Mining;		
	Industrial;		
	Street and highway lighting;		
	Electrified transportation;		
	Other (including municipal water pumping, oil/gas pipeline pumping, military, all other consumers not reported in subitems (1)-(8)); and		
	Sum of subitems (1)-(9);		
C.	An estimate of the demand for power in the applicant's system at the time of annual system peak demand, including an estimated breakdown of the demand into the consumer categories listed in item B;		
D.	Applicant's system peak demand by month;		
E.	Estimated annual revenue requirement/kWh for system in current dollars; and		
F.	Applicant's estimated average system weekday load factor by month;		
Subp. 3	Detail of forecast methodology employed, including:		
A.	Overall methodological framework that is used;		
B.	Specific analytical techniques used, their purpose, and components to which they were applied;		
C.	Manner in which specific techniques relate to forecast;		
D.	Where statistical techniques have been used:		
(1)	Purpose of technique;		
(2)	Typical computations, specifying variables and data; and		
(3)	Results of appropriate statistical tests;		
E.	Forecast confidence levels/ranges of accuracy for annual peak demand and consumption, and description of their derivation;		
F.	Brief analysis of methodology used, including		
	Strengths and weaknesses;		
	Suitability to the system;		

Authority	Required Information	Location in Application	Exemption Requested
	Cost considerations;		
	Data requirements;		
	Past accuracy; and		
	Other significant factors.		
G.	Explanation of discrepancies between application's forecast and applicant forecasts in other proceedings.		
Subp. 4	Data base used in forecast, including:		
A.	Complete list of all data used in forecast, including a brief description of each and how it was obtained;		
B.	Clear identification of any adjustments to raw data to adapt them for use in forecasting, including:		
	Nature of adjustment;		
	Reason for adjustment; and		
	Magnitude of adjustment		
Subp. 5	Essential forecast assumptions made regarding:		
A.	Availability of alternate sources of energy;		
B.	Expected conversion from other fuels to electricity or vice versa;		
C.	Future electricity prices in applicant's system and their effect on system demand;		
D.	Subpart 2 data that is not available historically nor created by applicant for forecast;		
E.	Effect of conservation programs on long-term demand; and		
F.	Any factor considered in preparing forecast.		
Subp. 6	Coordination of Forecasts		
A.	Extent of coordination of load forecasts with those of other systems	Ch. 5; Appendix F	
B.	Description of the manner in which those forecasts are coordinated	<a href="#">Ch. 3</a> ; Ch. 5; Appendix F	
Minn. R. 7849.0280	System Capacity Description		
A.	A brief discussion of power planning programs, including criteria, applied to the applicant's system and to the power pool or area within which the applicant's planning studies are based.	<del>4.4.2</del> <a href="#">21.4.2</a> ; 5.1; 5.2; 5.3; 6.2.1; 6.6	
B.	Brief discussion of power planning programs applied to applicant's system;		Full exemption requested

Authority	Required Information	Location in Application	Exemption Requested
C.	Applicant's seasonal firm participation purchases/sales for each utility involved in each transaction for each forecast year;		Full exemption requested
D.	Load and generation capacity data for sub-items below for summer and winter seasons for each forecast year, including anticipated purchases, sales, and capacity retirements/additions:		Full exemption requested
	Seasonal system demand;		
	Annual system demand;		
	Total seasonal firm purchases;		
	Total seasonal firm sales;		
	Seasonal adjusted net demand;		
	Annual adjusted net demand;		
	Net generating capacity;		
	Total participation purchases;		
	Total participation sales;		
	Adjusted net capability;		
	Net reserve capacity obligation;		
	Total firm capacity obligation; and		
	Surplus or deficit capacity.		
E.	Load and generation capacity data requested in item D/sub-items (1)-(13) for summer and winter seasons for each forecast year subsequent to the year of application, including purchases, sales, and generating capability contingent on the proposed facility;		Full exemption requested
F.	Load and generation capacity data requested in item D/sub-items (1)-(13) for summer and winter seasons for each forecast year subsequent to the year of application, including all projected purchases, sales, and generating capability;		Full exemption requested
G.	List of proposed additions/retirements in net generating capability for each forecast year subsequent to the year of application;		Full exemption requested
H.	Graph showing monthly adjusted net demand, monthly adjusted net capability, and difference between adjusted net capability and actual, planned, or estimated maintenance outages of generation/ transmission for specified time periods; and		Full exemption requested
I.	Discussion of method and appropriateness of determining system reserve margins.		Full exemption requested

Authority	Required Information	Location in Application	Exemption Requested
Minn. R. 7849.0290	Conservation Programs		Exemption requested; substitute information included in Chapters 5 and <a href="#">77.3.6</a> , and Appendix E and G
A.	Name of committee, department, individual responsible for applicant's energy conservation/efficiency programs, including load management;		
B.	List of applicant's conservation/efficiency goals and objectives;		
C.	Description of specific energy conservation/efficiency programs considered, a list of those implemented, and reasons why other programs have not been implemented;		
D.	Description of major energy conservation/efficiency accomplishments by applicant;		
E.	Description of applicant's energy conservation/efficiency plans through the forecast years; and		
F.	Quantification of how energy conservation/efficiency programs affect the 7849.0270, subp. 2 forecast, a list of total program costs, and discussion of expected program effects in reducing need for new generation and transmission.		
Minn. R. 7849.0300	Consequence of Delay (three levels of demand)		Exemption requested; substitute information included in Chapters <a href="#">66.7</a> and <a href="#">77.7</a>
Minn. R. 7849.0310	Required Environmental Information	Chapter 10	
Minn. R. 7849.0330	Transmission Facilities	—	
	Data for each alternative that would require LHVTL construction including:	—	
A.	For overhead transmission lines	—	
(1)	Schematics showing dimensions of support structures and conductor configurations for each type of support structure that may be used;	2.2.2; Appendix C	

Authority	Required Information	Location in Application	Exemption Requested
(2)	Discussion of the strength and distribution of the electric field attributable to the transmission facility, including the contribution of air ions if appropriate;	8.6	
(3)	Discussion of ozone and nitrogen oxide emissions;	8.2	
(4)	Discussion of radio and television interference; and	8.4	
(5)	Discussion of audible noise;	8.3	
B.	For underground transmission facilities:	N/A	
(1)	Types and dimensions of cable systems	N/A	
(2)	Types and qualities of cable system materials	N/A	
(3)	Heat released in kW per foot of cable	N/A	
C.	Estimated right-of-way required for the facility	1.2.1; <a href="#">Figure 1.6-1</a> ; 9.2	
D.	Description of construction practices	9.3; 9.4	
E.	Description of O&M practices	9.5; 9.6	
F.	Estimated workforce required for construction and O&M	2.5.2; <a href="#">2.7</a>	
G.	Description of region between endpoints in likely area for routes emphasizing a three mile radius of endpoints including:		Exemption requested; substitute information included in Chapter 10
(1)	Hydrological features		
(2)	Vegetation and wildlife		
(3)	Physiographic regions		
(4)	Land use types		
Minn. R. 7849.0340	No-Facility Alternative (three levels of demand)		Exemption requested; substitute information included in <a href="#">Section 6.7</a> and <a href="#">Section 7.7</a>

<b>Summary report:</b>	
<b>Litera Compare for Word 11.7.0.54 Document comparison done on 2/27/2026 10:13:36 AM</b>	
<b>Style name:</b> Default Style	
<b>Intelligent Table Comparison:</b> Active	
<b>Original filename:</b> Appendix A_Completeness Checklist_Revised(v1).docx	
<b>Modified filename:</b> Appendix A_Completeness Checklist_Revised(v2).docx	
<b>Changes:</b>	
<u>Add</u>	15
<del>Delete</del>	9
<del>Move From</del>	0
<u>Move To</u>	0
<u>Table Insert</u>	0
<del>Table Delete</del>	0
<u>Table moves to</u>	0
<del>Table moves from</del>	0
Embedded Graphics (Visio, ChemDraw, Images etc.)	0
Embedded Excel	0
Format changes	0
<b>Total Changes:</b>	<b>24</b>



# Appendix D (Revised)

## Xcel Energy Revenue Requirement

### **Note:**

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

- The tables labeled "Project Summary" depict the total "all in" and "year-1" revenue requirement for the Project on their respective tabs. These tables include the total NSP revenue requirement, the applicable interchange allocator, the Minnesota demand allocator, and the resulting Minnesota jurisdictional share.
- The tables labeled "Total – NSP Project Cost" depict the full year by year summary of the NSP revenue requirement and Minnesota jurisdictional revenue requirement.
- The tables labeled "Rev. Req. Line" and "Rev. Req. Sub." depict the detailed annual revenue requirement calculations for the transmission line and substation components, respectively, of the Project. The "Rev. Req. Line" tab contains full calculations of rate base, depreciation, accumulated deferred income tax, tax depreciation, property tax, return, income taxes, and total annual revenue requirement for the transmission line portion. The "Rev. Req. Sub." tab is included for completeness, but it shows no substation costs for this Project because the substation investment is zero; therefore, all revenue requirement components in that tab are zero.
- The tables labeled "Key Inputs" identify the inputs and/or assumptions used in the analysis.

**IN THE MATTER OF THE APPLICATION FOR A  
CERTIFICATE OF NEED FOR THE GOPHER TO  
BADGER LINK 765 KV HIGH VOLTAGE  
TRANSMISSION LINE PROJECT (LRTP 26)**

**DOCKET No. ET3, E002/CN-25-121**

**CERTIFICATE OF SERVICE**

Breann L. Jurek certifies that on the 4th of March, 2026, she e-filed a true and correct copy of the **Reply Comments**, on behalf of Northern States Power Company, doing business as Xcel Energy, and Dairyland Power Cooperative via eDockets ([www.edockets.state.mn.us](http://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 March 4, 2026

*Signed: /s/ Breann L. Jurek*

\_\_\_\_\_  
Fredrikson & Byron, P.A.

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