

From: [Martinique Williams](#)
To: [Staff, CAO \(PUC\)](#)
Subject: PUC Comment on the 25-111
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The PUC comment on the 25-111 need is of particular importance. The application is missing the following and deserves comment and attention!

1. Actual statement of need - data for projected need for the project should NOT be trade secret. Residents should NOT have to sign an NDA to get the projected need data. MN Power customers should be able to view the data showing that the 345 kV line and the substation 22-611 with additional 345 kV hookups are needed to support data center development in MN and WI, coal plants aren't being decommissioned, so the lines have nothing to do with green energy
2. Alternative route consideration for the new transmission line between the old and the new substation (Segment 3) - appendix G of the application includes alternative routes for all segments except Segment 3.
3. Adequate notification of Segment 3 to residents affected by the 1.5 mile new transmission line; the map wasn't included in the public presentation April 6-7, 2026, or in mailing to affected residents - "survey" for "project planning" is insufficient notification.
4. Cumulative impact statement of the real and true number of residents that will be required to relocate either for data center development or high voltage transmission line in the SW corner of Hermantown and into Solway Township.
5. Regulatory "streamlining" and informal decision making - MISO is self-interested in support of utility companies, if there aren't rules or statutes for regulatory process in MN, PUC should not be able to approve transmission line projects, particularly those supporting private equity gain (e.g., Google, Mortenson, BlackRock) at the expense of rate payers, some of whom actually live in the directly affected corridor.

Thank-you,

M.D. Williams