

Supplemental Comments on Application 25-117

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, Great River Energy, Northern States Power Company, doing business as Xcel Energy, and ITC Midwest LLC (together, Applicants) submitted Reply Comments (Docket #25-117, 20263-228830-01, dated 03/02/2026).

In Section VI. Individual Commenters, B. Dale Thomforde, pages 8-9, the Applicants submitted Reply Comments regarding my Comments on the Completeness of the Application.

A. Applicants cited my first comment in a footnote, ²⁸ *Thomforde Notice Comments at 2.* (See Docket #25-117, 20262-227823-01, dated 02/04/2026.) I asked *“How do we submit names of landowners that should have been notified that were not included in Attachment B for the Certificate of Need Application for the proposed PowerOn Midwest 765 kilovolt (kV) and 345 kV High Voltage Transmission Line Project (Docket #25-117)?”*

Applicants stated in their Reply: *“Dale Thomforde submitted comments requesting clarification regarding Project notices and indicating there may be landowners within the Notice Area who had not received notice of the Project.”*²⁸ *The Applicants followed up with Thomforde and, as a result, added one mailing address to the notice list.”*

In a follow up email exchange, I was contacted and submitted information on a landowner missing in Attachment B. In a later email exchange, I submitted information on two additional landowners that were missing in the Attachment B notification list.

As a result of the email exchanges, I believe the information on the three missing landowners has been added to the notification list.

B. Applicants cited my comments on completeness in a footnote, ³⁰ *Thomforde System Alternative Comments at 2-3.* (See Docket #25-117, 20262-228287-01, dated 02/18/2026.)

Applicants state: *“Thomforde also submitted comments describing a system alternative Thomforde will propose regarding the Gopher to Badger Link Project in Docket No. CN-25-121, and noted that the system alternative may also impact this Project.”*³⁰ *The comments do not raise a completeness issue, and Applicants note that proposal and 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 for the Gopher to Badger Link Project and should thus be addressed within Docket No. CN-25-121.”*

Applicants have submitted an 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). My proposed alternatives in my Comments on Application 25-117 Completeness submission (Docket #25-117, 20262-228287-01, dated 02/18/2026), raised the issue of the need for the 765 kV transmission line from the Pleasant Valley Substation to the new North Rochester Substation, and a corresponding need for the new North Rochester Substation. Both this 765 kV transmission line and the new North Rochester Substation are part of the Poweron Midwest Project and Certificate of Need application.

My proposed alternatives in the No Build Segment 1 and Partial Build Segment 2 Option and the No Build Pleasant Valley to North Rochester 765kV Option are linked together and would affect both the Gopher to Badger Link Project (Docket No. CN-25-121) and the Poweron Midwest Project (Docket No. CN-25-117). This **no build** option for the 765 kV transmission line from the Pleasant Valley Substation to the new North Rochester Substation, and a corresponding need for the new North Rochester Substation, are part of the Poweron Midwest Project.

These are serious alternative proposals, and together have a potential savings of \$1,000 Million (\$1 Billion), and I would hope the Poweron Midwest Project would give it serious consideration.

I have provided this alternative Poweron Midwest proposal as a courtesy to the Applicants to provide their engineers and MISO as much time as possible to evaluate the proposal so we can work out any kinks together. This alternative can be delayed by the Applicants until the scoping process, but that will probably only extend the total time for the approval process. This No Build Pleasant Valley to North Rochester 765kV Option proposal may help make many residents and farmers very happy that would not be impacted by a new 765 kV line going through or near their property. It may also save the Applicants from a lot of unnecessary work and expenditures.

Respectfully submitted,
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