

September 2, 2025

Mike Bull
Interim Executive Secretary
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. E002, ET2, E015, E017, ET6135/CN-25-116.

Dear Mr. Bull:

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

Notice Plan Petition: In the Matter of the Application for a Certificate of Need for the Bison to Alexandria Second Circuit 345 KV Transmission Line Project.

The Petition was filed by Great River Energy, Minnesota Power, Otter Tail Power Company, Western Minnesota Municipal Power Agency and Northern States Power Company, doing business as Xcel Energy.

The Department recommends **approval with modifications** and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

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

DH/SR/ad
Attachments



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. E002, ET2, E015, E017, ET6135/CN-25-116

I. INTRODUCTION

On August 15, 2025, Great River Energy (GRE), Minnesota Power, Otter Tail Power Company (OTP), Western Minnesota Municipal Power Agency, and Northern States Power Company, doing business as Xcel Energy (Hereinafter “Applicants”) filed a Notice Plan for approval by the Minnesota Public Utilities Commission (Commission).¹ The Notice Plan was for the Bison to Alexandria second circuit 345 kilovolt (kV) transmission line project.²

The applicants propose a 345 kV transmission circuit between existing Substations at Bison and Alexandria.³ The existing substations are already equipped for 345 kV and constructed as double-circuit capable from the Fargo – St. Cloud 345 kilovolt Transmission Project. Clay, Wilkin, Otter Tail, Grant, and Douglas counties will be affected by the project.

The Project address’s reliability issues with increased transmission capacity.⁴ Increased capacity allows transport of more electricity from generation resources in Western Minnesota, North Dakota, and South Dakota. The proposed line originated in the from the Long-Range Transmission Planning (Hereinafter “LRTP”) Tranche 2.1 Portfolio, where LRTP projects were developed by the Midcontinent Independent System Operator (Hereinafter “MISO”).

II. PROCEDURAL BACKGROUND

February 7, 2025 Applicants filed a Notice of Intent to Construct.⁵

August 15, 2025 Applicants file Notice Plan.

III. DEPARTMENT ANALYSIS

A. GOVERNING STATUTES AND RULES

The Applicants filed the Notice Petition pursuant to Minn. R. 7829.2550 subp. 1, which states, in part, “[t]hree months before filing a certificate of need application for a high-voltage transmission line as

¹ Notice Plan Petition, Great River Energy, Minnesota Power, Otter Tail Power Company, Western Minnesota Municipal Power Agency, and Xcel Energy, August 15, 2025, Docket No. E002, ET2, E015, E017, ET6135/CN-25-116 (eDockets) [20258-222171-01](#) at 1. Hereinafter “Petition.”

² Petition at 2.

³ Petition at 2.

⁴ Petition at 2.

⁵ Notice of Intent to Construct, Own, And Maintain the Bison Alexandria 345 kV Transmission Line Project, Great River Energy, Minnesota Power, Otter Tail Power Company, Western Minnesota Municipal Power Agency, and Xcel Energy, February 7, 2025 , Docket No. E002,Et2,E015,E017,Et6135/Cn-25-116 (eDockets) [20252-215108-01](#).

defined by Minnesota Statutes, section 216B.2421, the applicant shall file a proposed plan for providing notice to all persons reasonably likely to be affected by the proposed line.”⁶

Minn. Stat. § 216B.2421 includes in its definition of a Large Energy Facility (LEF), “any high-voltage transmission line with a capacity of 300 kilovolts or more and greater than one mile in length.” Given that the proposed project is a 345 kV transmission line substantially longer than 1 mile, the proposed project falls within the definition of “large energy facility” and, therefore, requires a notice plan.

B. TYPES OF NOTICE

Minn. R. 7829.2550, subp. 3, requires types of notice as follows:

- direct mail notice, based on county tax assessment rolls, to landowners reasonably likely to be affected by the proposed transmission line;
- direct mail notice to all mailing addresses within the area reasonably likely to be affected by the proposed transmission line;
- direct mail notice to tribal governments and to the governments of towns, statutory cities, home rule charter cities, and counties whose jurisdictions are reasonably likely to be affected by the proposed transmission line; and
- newspaper notice to members of the public in areas reasonably likely to be affected by the proposed transmission line.⁷

The Applicants propose to distribute notices the area depicted in Attachment A, which “includes a one-half mile buffer from the existing Fargo – St. Cloud 345 kV transmission line alignment.” The “proposed 345 kV transmission line will traverse Clay, Wilkin, Otter Tail, Grant, and Douglas counties.”⁸

Direct mailings of notices are described in the Petition. The Applicants identified landowners and addresses that will likely be affected by the transmission line with county property parcel data. The Applicants will directly mail notices to the federally recognized Tribal Nations within Minnesota, and the Minnesota Indian Affairs Council.⁹ Applicants further plan to contact all lead personnel and elected officials to the local units of government within the area.¹⁰ Furthermore, the applicants will send direct mailings to the area’s corresponding Minnesota Legislators and US Congressional members.¹¹

The Department compared the list of local governments to be provided notice to the map provided in Attachment A of the Petition. Upon examining the list, the Department recommends that Evansville and Brandon Townships be added to the list of local governments.

⁶ [Minn. R. 7829.2550](#), subp. 1.

⁷ [Minn. R. 7829.2550](#), subp. 3

⁸ Petition at 2.

⁹ *Id.*, at 4.

¹⁰ *Ibid.*

¹¹ *Ibid.*

The Notice Petition states that the Applicants will notify the 11 federally recognized tribal nations in Minnesota, which are listed in Attachment B-1. The Department examined the list and recommends that the Applicants use the name “Ojibwe” instead of the alternate name “Chippewa,” in all future notices and filings, unless otherwise requested by tribal area representatives.

The Applicants describe the newspaper notices, list the specific newspapers that will print the notices,¹² and provide a prototype notice.¹³ The Department agrees that notices should go to the newspapers listed in Table 1 of the petition.

Minnesota Rules also require a notice in a statewide newspaper of general circulation upon the application for a certificate of need in addition to the above requirement.¹⁴ The Applicants seek a variance to this requirement.¹⁵ Pursuant to Minnesota Rules, a variance can be granted by the Commission under this section if:

- enforcement of the rule would impose an excessive burden upon the applicant or others affected by the rule;
- granting the variance would not adversely affect the public interest; and
- granting the variance would not conflict with standards imposed by law.¹⁶

The Applicants claim that the first newspaper notice will be provided between 60 days and two weeks prior filing the certificate of need petition. The second newspaper notice will be filed shortly after filing the certificate of need petition.¹⁷ The dates imply that the Applicants would file statewide newspaper notices less than 3 months apart.

The Department agrees with the Applicants’ assessment regarding duplication of statewide notices.

The Department recommends:

- Applicants should add Evansville and Brandon Townships to the list of local governments that receive direct mailings.
- The Applicants should use the name “Ojibwe” instead of the alternate name “Chippewa,” in all future notices and filings, unless otherwise requested by tribal area representatives.

C. CONTENT OF NOTICE

Minn. R. 7829.2550, subp. 4 requires the notices to provide the following information:

- a map showing the end points of the line and existing transmission facilities in the area;

¹² *Id.*, at Table 1.

¹³ *Id.*, at 4-5, Table 1, and Attachment C.

¹⁴ [Minn. R. 7829.2500](#), subp. 5

¹⁵ [Minn. R. 7829.3200](#), subp. 1. Petition at 5.

¹⁶ Petition at 5. [Minn. R. 7829.3200](#), subp. 1.

¹⁷ Petition at Attachments A and C.

- a description of general right-of-way requirements for a line of the size and voltage proposed and a statement that the applicant intends to acquire property rights for the right-of-way that the proposed line will require;
- a notice that the line cannot be constructed unless the Minnesota Public Utilities Commission (Commission) certifies that it is needed;
- the Commission's mailing address, telephone number, and website;
- if the applicant is a utility subject to chapter 7848, the address of the website on which the utility applicant will post or has posted its biennial transmission projects report required under that chapter;
- a statement that the Environmental Quality Board will be preparing an environmental report on each high-voltage transmission line for which certification is requested;
- a brief explanation of how to get on the mailing list for the Environmental Quality Board's proceeding; and
- a statement that requests for certification of high-voltage transmission lines are governed by Minnesota law, including specifically chapter 4410, parts 7849.0010 to 7849.0400, and 7849.1000 to 7849.2100, and Minnesota Statutes, section 216B.243.¹⁸

As further background, Minnesota Rules 7849.0010 to 7849.0400, and 7849.1000 to 7849 set requirements regarding the content and procedures for the Certificate of Need. Minn. R. 7849.0010 to 7849.0400 set forth the purpose, scope and requirements to the application for the Certificate of Need.¹⁹ The rules include application procedures, such as a requirement to include data on peak demand and annual electric consumption within the application.²⁰ Minn. R. 7849.1000 to 7849.2100 pertain to environmental reports that are submitted with the application for the Certificate of Need.²¹

The Department checked both example Direct Mailing (Attachment A) and newspaper submission (Attachment C). The Attachments have met all but one of the requirements. Specifically, the Applicants' statement that "an environmental report will be prepared" does not note which agency prepares the environmental report; the Minnesota Public Utilities Commission prepares that report.²²

The Department recommends that the Applicants revise the direct mailing and newspaper notices to include a statement that the Commission will prepare an environmental report on the transmission line.

¹⁸ [Minn. R. 7829.2550](#), subp. 4.

¹⁹ [Minn. R. 7849](#).

²⁰ [7849.0270](#), subp. 1

²¹ See [Minn. R. 7849](#).

²² Minnesota Department of Commerce, "Environmental Review of Energy Projects," <https://eera.web.commerce.state.mn.us/>. Downloaded on September 1, 2025. The Public Utilities Commission also reviews the environmental report. See Minnesota Public Utilities Commission, "Certificate of Need," <https://puc.eip.mn.gov/certificates-of-need>. Downloaded on September 1, 2025. [Minn. R. 7849.1900](#).

D. A STATEMENT THAT THE COMMISSION WILL BE PREPARING AN ENVIRONMENTAL REPORT

Minn. R. 7829.2550, subp. 6 requires an applicant to implement the notice plan within 30 days of its approval by the Commission.²³ In this case the Applicants request that the Commission grant a variance and direct the notices occur no more than 60 days and no less than two weeks prior to the filing of the certificate of need application.²⁴

The Applicants contend that the requirements for a variance²⁵ are met as follows:

1. the notice requirements would burden all parties by separating notice provided to interested stakeholders from the start of the proceeding;
2. granting the variance would not adversely affect the public interest; and
3. granting a variance would not conflict with standards imposed by law.²⁶

The Department agrees with the Applicants' assessment and recommends that the Commission approve the proposed rule variance regarding notice timing

IV. DEPARTMENT RECOMMENDATIONS

Based on analysis of the Petition, the Department finds the Applicants' Petition generally to be compliant, except for three instances. The Department prepared recommendations below. The three recommendations correspond to the subheadings of Section III above.

B. TYPES OF NOTICES

- B.1. Applicants should add Evansville and Brandon Townships to the list of local governments that receive direct mailings.
- B.2. The Applicants should use the name "Ojibwe" instead of the alternate name "Chippewa," in all future notices and filings, unless otherwise requested by tribal area representatives.

C. CONTENT OF NOTICES

- C.1. Applicants should revise the direct mailing and newspaper notices to include statement that the Commission will prepare an environmental report on the transmission line.

²³ [Minn. R. 7829.2550, subp. 6.](#)

²⁴ Petition, at 6.

²⁵ [Minn. R. 7829.3200, subp. 1.](#)

²⁶ Petition, at 6.

CERTIFICATE OF SERVICE

I, Nicole Westling, hereby certify that I have this day, served copies of the following document on the attached list of persons 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. E002, ET2, E015, E017, ET6135/CN-25-116

Dated this **3rd** day of **September 2025**

/s/Nicole Westling

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4	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	CN-25-116
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