



September 26, 2025

—Via Electronic Filing—

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

RE: REPLY COMMENTS ON EXEMPTION REQUEST

IN THE MATTER OF THE APPLICATION FOR A CERTIFICATE OF NEED FOR THE
BISON TO ALEXANDRIA SECOND CIRCUIT 345 kV TRANSMISSION LINE
PROJECT

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

Dear Ms. Bergman:

Northern States Power Company, doing business as Xcel Energy, Great River Energy, Minnesota Power, Otter Tail Power Company, and Western Minnesota Municipal Power Agency (together, the Utilities) respectfully submit these reply comments to the Minnesota Public Utilities Commission (Commission) concerning the Exemption Request filed by the Utilities on August 15, 2025 for the Bison-Alexandria 345 kilovolt (kV) transmission line project (Project). The Project involves adding a new 345 kV transmission circuit on existing transmission line structures from the existing Bison Substation near Fargo, North Dakota to the existing Alexandria Substation near Alexandria, Minnesota. The existing 345 kV structures were previously permitted and constructed as double-circuit capable as part of the Fargo – St. Cloud 345 kV Transmission Project (Fargo Project).¹

Initial comments regarding the Utilities' Exemption Request were filed by the Department of Commerce (Department)² and No CapX 2020.³ The Utilities respond to these commenters in turn below.

¹ *In the Matter of the Application for a Route Permit for the Fargo – St. Cloud 345 kV Transmission Project*, Docket No. E002, ET2/TL-09-1056, FINDING OF FACT, CONCLUSIONS OF LAW, AND ORDER ISSUING AN HVTL ROUTE PERMIT TO XCEL ENERGY AND GREAT RIVER ENERGY (June 24, 2011).

² *In the Matter of the Application for Certificate of Need for the Bison to Alexandria Second Circuit 345 kV Transmission Line Project*, Docket No. E002, ET2, E017, ET6135/CN-25-116, DEPARTMENT INITIAL COMMENTS (Sept. 19, 2025).

³ *In the Matter of the Application for Certificate of Need for the Bison to Alexandria Second Circuit 345 kV Transmission Line Project*, Docket No. E002, ET2, E017, ET6135/CN-25-116, NO CAPX2020 INITIAL COMMENTS (Aug. 29, 2025).

Department

In its initial comments, the Department recommends approval of the Utilities' Exemption Request as filed with one clarification. With regard to the Utilities' requested exemptions for Minn. R. 7849.0300 and Minn. R. 7849.0340, the Department recommends that the Certificate of Need Application include a "generalized summary-level discussion" of the consequences of delay and the no build alternative.⁴ The Utilities agree that a general discussion of these items is important to understanding the need for the Project and will address this item in the Certificate of Need Application.

The Utilities wish to clarify one additional item in the Department's initial comments. The Department recommends "that the Commission approve the requested exemption from Minn. R. 7849.0260 B(4) and 7849.0260 B(8), *with provision of the proposed alternative data*."⁵ The Utilities did not propose to provide alternative data as part of their request and the Utilities do not believe that any alternative data is appropriate here. This request relates to the Utilities request to be exempted from providing information on alternative end points for the Project due to the language of Minn. Stat. § 216B.243, subd. 3(6). This statute provides that the Commission "must not require an evaluation of alternative end points" unless the alternative end points are consistent with the endpoints evaluated by MISO or are otherwise agreed to by the applicant.⁶ As no alternative end points were evaluated by MISO, and the Utilities have not agreed to evaluate alternative endpoints, no alternative data is not appropriate to include in the Certificate of Need Application. The Utilities reassert their request for an exemption from analyzing alternative endpoints for the Project consistent with Minn. Stat. § 216B.243, subd. 3(6), as proposed in the Utilities' Exemption Request.⁷

No CapX 2020

In its August 28, 2025 comments, No CapX 2020 requests that a number of the Utilities' requested exemptions be denied. One of the basis for No CapX 2020's requested denial is that the Utilities cited as support for their exemption requests the fact that the Commission has previously granted such exemption requests in other dockets.⁸ However, this is not the primary reason put forth by the Utilities for any of their requested exemptions. For each exemption request, the Utilities provided a discussion of why the information required by the rule is not relevant to determining the need for the Project or how required information could be satisfied by alternative data.⁹ The

⁴ DEPARTMENT INITIAL COMMENTS at 8.

⁵ *Id.* at 5 (emphasis added).

⁶ Minn. Stat. § 216B.243, subd. 3(6)

⁷ *In the Matter of the Application for Certificate of Need for the Bison to Alexandria Second Circuit 345 kV Transmission Line Project*, Docket No. E002, ET2, E017, ET6135/CN-25-116, UTILITIES' EXEMPTION REQUEST at 7-8 (Aug. 15, 2025).

⁸ NO CAPX2020 INITIAL COMMENTS at 5-8.

⁹ Minn. R. 7849.0200, subp. 6.

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Utilities only cited prior Commission decisions granting its proposed exemptions to illustrate that the Commission has previously found that the requested exemptions are appropriate for other similar transmission line projects.

No CapX 2020 also takes issue with a number of the requested exemptions based on the fact that the Utilities propose to provide substitute information from MISO related to either forecast data and cost allocation. Contrary to the No CapX 2020's assertion, the Utilities are not proposing to include this data so that they can rely solely on MISO's analysis to support the need for the Project. Rather, this information is helpful information for the Commission to understand how this Project was analyzed by MISO and how its costs will be regionally shared. By providing this MISO information, along with the Utilities' own analysis, the Commission, the Department, and other stakeholders will have the information necessary to determine whether the criteria for granting a Certificate of Need under Minnesota law have been met.

The Utilities respectfully request that the Commission reject each of No CapX 2020's recommendations and grant the Utilities' requested exemptions.

We have electronically filed this document with the Commission, and copies have been served on the parties on the attached service lists. Please contact Jody Londo at jody.l.londo@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/ Bria Shea

BRIA SHEA
REGIONAL VICE PRESIDENT, REGULATORY POLICY
NORTHERN STATES POWER COMPANY

cc: Service List

*IN THE MATTER OF THE APPLICATION FOR
A CERTIFICATE OF NEED FOR THE BISON TO
ALEXANDRIA SECOND CIRCUIT 345 kV
TRANSMISSION LINE PROJECT*

DOCKET NO. E002, ET2, E015, E017,
ET6135/CN-25-116

CERTIFICATE OF SERVICE

Gustav Gerhardson certifies that on the 26th day of September, 2025, on behalf of Northern States Power Company, doing business as Xcel Energy, Great River Energy, Minnesota Power, Otter Tail Power Company, and Western Minnesota Municipal Power Agency, he efiled a true and correct copy of the **REPLY COMMENTS ON EXEMPTION REQUEST** by posting the same on [eDockets](#). Said filing is also served as designated on the attached Service List on file with the Minnesota Public Utilities Commission in the above-referenced docket number.

/s/ Gustav Gerhardson
Gustav Gerhardson

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP		50 S 6th St Ste 1500 Minneapolis MN, 55402-1498 United States	Electronic Service		No	CN-25-116
2	Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	CN-25-116
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7	Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	CN-25-116
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10	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	CN-25-116
11	Hillary	Creurer	hcreurer@allete.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	CN-25-116
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41	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	CN-25-116
42	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	CN-25-116
43	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	CN-25-116
44	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	CN-25-116
45	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	CN-25-116
46	Priti	Patel	ppatel@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369-4718 United States	Electronic Service		No	CN-25-116
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48	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		No	CN-25-116
49	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	CN-25-116
50	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	CN-25-116
51	Susan	Romans	sromans@allete.com	Minnesota Power		30 West Superior Street Legal Dept Duulth MN,	Electronic Service		No	CN-25-116

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65	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	CN-25-116