

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

PUC Docket Numbers: ET3, E002/CN-25-121

Supplemental Comments

LIUNA Minnesota and North Dakota (“LIUNA”) appreciates the opportunity to comment on the certificate of need application filed by Xcel Energy (“Xcel”) and Dairyland Power Cooperative (“Dairyland”) for construction of 34 miles of 765 kV and 105 miles of 765 kV/161 kV transmission lines. We believe that the applications satisfy the requirements of applicable statutes and rules governing issuance of a Certificate of Need for the development of high-voltage transmission lines, and we urge the Minnesota Public Utilities Commission (“Commission”) to accept the applications as complete and allow the applicants to proceed.

LIUNA represents more than 14,000 skilled construction laborers, of whom more than a third receive electric services from Xcel or distribution coops served by Dairyland. Our members and their families count on affordable and reliable electricity, not only to power their homes but also to serve construction contractors for whom they work, and energy-intensive industries that provide construction work opportunities.

Many LIUNA members also work in the energy industry, and our union has become heavily involved in policy and regulatory processes to support an orderly energy transition that reduces greenhouse gas emissions while preserving reliability and maximizing the employment and other socioeconomic benefits of energy investment. In our view, a critical shortage of transmission capacity currently represents the greatest obstacle to accomplishing these goals.

We appreciate the careful work done by project proposers to prepare a Certificate of Need application that meets all of the requirements set out in statute and rule. We recommend that the Commission accept the application as complete and order an informal review process as recommended by the Department of Commerce, Joint Commenters and others.

We do not believe any party has identified contested issues of fact requiring contested case proceedings through the Court of Administrative Hearings. We disagree with the contention by North Route Group and NO765MN (“opponents”) that economic modeling assumptions used by the Midcontinent Independent System Operator (“MISO”) are outdated and should not be used to evaluate the project’s suitability for a Certificate of Need, and note that opponents’ speculations with respect to potential economic or policy change do not establish a factual dispute because directly relevant facts are presented.

Opponents do not refute any of the factual basis for the application but instead engage in hand-waving about the applicability of data that are a mere two years old – a mere blink of the eye in transmission planning time” to what they characterize with little substantive detail as “our Trump administration world.” Opponents also lean on the recent COVID pandemic, to the best

of our understanding in support of a broad claim that seems to amount to “life comes at you fast so why plan at all? But these references to the current Federal administration and COVID serve to undercut rather than support their main argument, inasmuch as both are largely relevant only over a much shorter time horizon than that used for transmission planning.

We are currently in the middle of our second Trump administration in 10 years, yet after five years of governance characterized by climate change and clean power skepticism, demand for electricity in general, and clean power in particular, are greater than ever. The COVID recession, which began just six years ago, is already far in the rearview mirror having been quickly followed by a COVID recovery, and it should be clear in retrospect that policy decisions made assuming that demand would be permanently destroyed by COVID would have been poor ones. The long-term trends upon which MISO’s decisions have been based have been remarkably consistent, and if anything have only accelerated as demand for electricity grows.

We thank the Commission for your consideration and look forward to participating in this docket.

Dated: March 9, 2026

Respectfully Submitted,
LIUNA Minnesota & North Dakota

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