

Reply to Applicants' Comments on Commission Staff's Briefing Papers

Below is a reply to APPLICANTS' COMMENTS ON COMMISSION STAFF'S BRIEFING PAPERS, DECISION OPTION TWO (Docket No. E002, ET2, ET6675/CN-25-117, 20267-233816-01), filed July 6, 2026.

MISO and the Applicants intentionally separated and filed separate Certificates of Need (CON) for the PowerOn Midwest transmission line (LRTP 24, Docket 25-117) and the Gopher to Badger Link (LRTP 26, Docket 25-121). Why?

Would MISO and the Applicants want to build one without the other if the MPUC denies the CON for one and not the other? I think not. MISO and the Applicants are so confident that they believe the MPUC would not deny them a Certificate of Need (CON) for either project. These are not stand-alone projects. They are inextricably connected, both physically and electrically.

MISO and the Applicants are so confident in the Certificates of Need for both projects that they refuse to justify the need for the North Rochester 765 kV Substation. They claim that they do not need to justify the need based on Minn. Stat. § 216B.243, subd. 3(6), ignoring the part of that statute that allows them to agree to evaluate alternatives. They could do that, but refuse to do so. Is it just arrogance? I would hope they understand it is still up to the MPUC whether to grant a Certificate of Need.

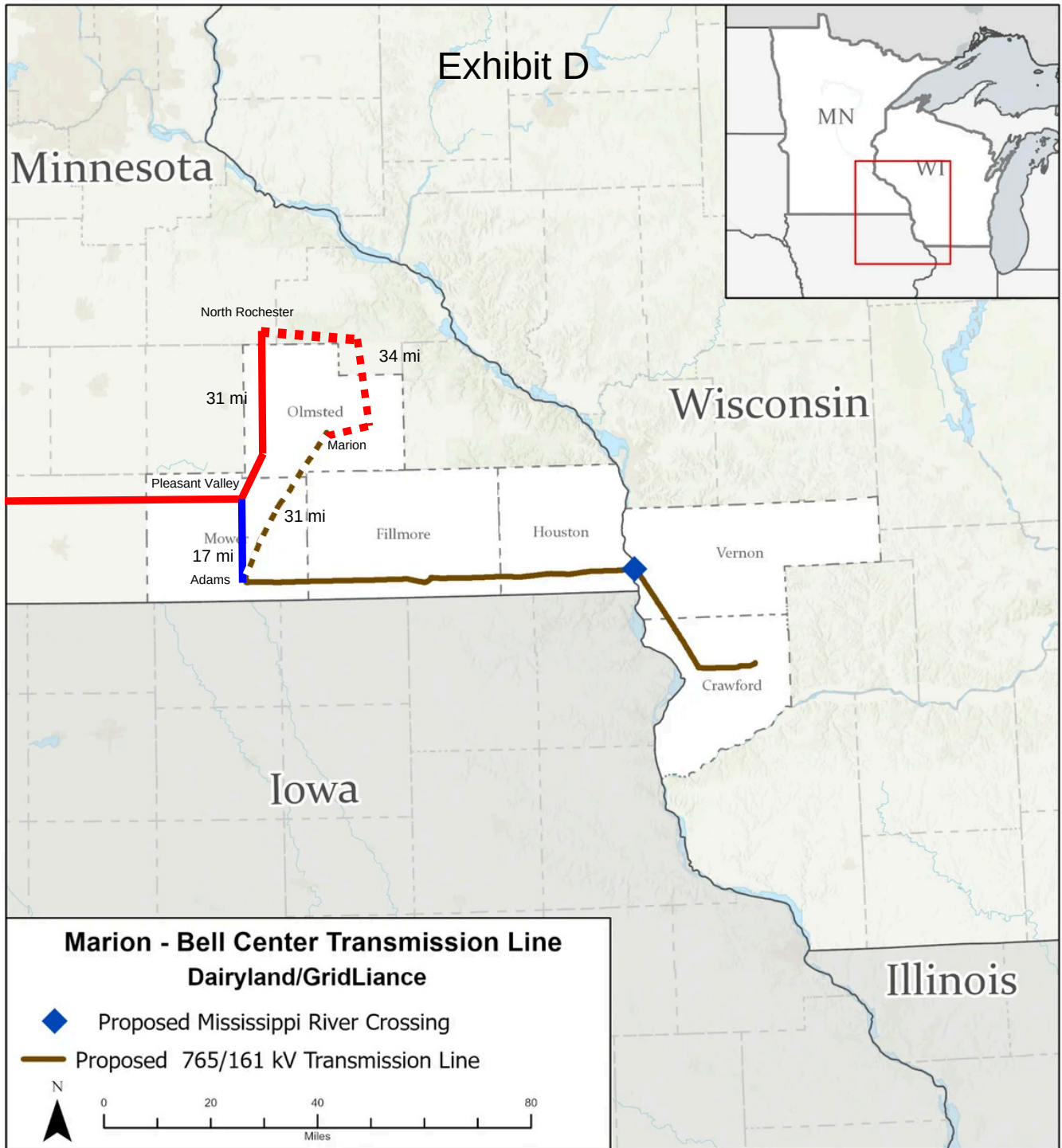
If MISO and the Applicants can justify the need for the North Rochester 765 kV Substation, they should be more than willing to provide that justification. Just refusing to provide that justification because MISO has made a claim that it is needed, without providing justification, is the height of arrogance. State law may be on their side, but there is no requirement that the MPUC has to approve a CON application without support of the need, other than a claim by MISO that it is needed.

The 25-117 CON Application and the 25-121 CON Application both have the North Rochester 765 kV Substation connecting the backbone 765 kV transmission line between South Dakota and Wisconsin. This same connection could be made at the Pleasant Valley Substation, saving about 79 miles of 765 kV transmission line and an estimated \$1,000 million, yes \$1 billion. (See Exhibit D) It seems only reasonable that the Environmental Report should evaluate viable alternatives to help determine ultimately if the Certificate of Need, as submitted, should be approved.

As presented in the 25-117 CON Application, the only other connection to the North Rochester 765 kV Substation is a 345 kV single-circuit transmission line connected to the North Rochester 345/161 kV Substation. Certainly there are a lot of less expensive, less obtrusive, and environmentally friendly alternatives to get an additional 345 kV single-circuit transmission line connected the North Rochester 345/161 kV Substation. Isn't that the purpose of the Environmental Report?

Respectfully submitted,

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Original map source: <https://www.maribelltransmission.com/project-details> 11-30-2025