

February 23, 2026

VIA E-FILING

Ms. Sasha Bergman
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, MN 55101-2147



Re: Comment on Application Completeness

*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*
PUC Docket No. CN-25-117

Dear Executive Secretary Bergman:

The Minnesota Center for Environmental Advocacy, the Citizens Utility Board of Minnesota, Sierra Club, Clean Grid Alliance, and Fresh Energy (“Joint Commenters”) respectfully submit these comments in response to the February 9, 2026 Notice of Comment Period on Application Completeness issued by the Minnesota Public Utilities Commission in the above-referenced docket.

As ratepayer and clean energy advocates, we recognize the importance of transmission developments for advancing clean, reliable, and affordable energy across the state. New transmission buildouts will open the state to more renewable energy generation resources and assist Minnesota’s utilities in complying with the state’s 100 percent carbon-free energy standards. New transmission is also needed to contribute to greater reliability and system resilience, as well as mitigate exposure to fuel cost volatility.

The PowerOn Midwest project was developed as part of the Midcontinent Independent System Operator’s (“MISO”) Long-Range Transmission Planning (“LRTP”) process and represents the Minnesota portion of LRTP projects 22, 23, 24, and 25. MISO develops LRTP portfolios through a 7-step planning process that involves evaluating scenario-based futures that consider load forecasts, generation forecasts, and siting. Solutions are identified, rigorously modeled, and vetted by stakeholders. The LRTP process culminates with MISO board approval consistent with MISO Transmission Expansion Plan (“MTEP”) procedures.¹ MISO’s LRTP Tranche 2.1 was approved

¹ See MISO, *Long Range Transmission Planning (LRTP) Tranche 2 – FAQs*, <https://cdn.misoenergy.org/MISO%20Long-Range%20Transmission%20Planning%20LRTP%20Tranche%202%20FAQs631005.pdf> (accessed Feb. 23, 2026).

by the Board of Directors in December 2024. As Multi-Value Projects (MVPs) under MISO's tariff, LRTP projects must support one or more of the following objectives:

- Reliably and economically enable regional public policy needs;
- Provide multiple types of regional economic value; or
- Provide a combination of regional reliability and economic value.²

Both the need for and the benefit of the PowerOn Midwest project have been well-documented during the LRTP Tranche 2.1 development process. We appreciate the efforts undertaken by the applicants to build on this analysis and bring forward a comprehensive project proposal that advances the interests of Minnesotans for clean, affordable, and reliable energy. We remain interested in ensuring the project is developed in a cost-effective manner and that the review process is reasonable and timely.

While the scope and scale of the proposed transmission development is significant, we believe the project can be appropriately reviewed and analyzed within the context of the Commission's informal docket procedures. We believe there are unlikely to be substantial disputes regarding the need for the line, which would necessitate a contested case proceeding. Following the Commission's informal process would allow the Joint Commenters and the public to more fully and effectively participate in Commission proceedings.

For these reasons, we recommend that the Commission utilize its informal process to develop the record for this matter.

Sincerely,

S/ Abigail Hencheck
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Minnesota Center for Environmental
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S/ Brandon Crawford
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Regulatory Advocate
Citizens Utility Board of Minnesota

S/ Elizabeth Wheeler
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S/ Patrick Woolsey
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S/ Will Mulhern
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² MISO, *Multi-Value Projects*, <https://www.misoenergy.org/planning/multi-value-projects-mvps/#t=10&p=0&s=Updated&sd=desc> (accessed Feb. 23, 2026).