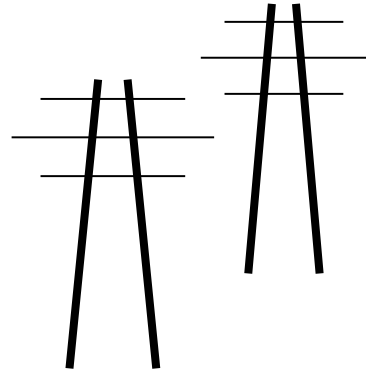


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April 30, 2026

Sasha Bergman  
Executive Secretary  
Public Utilities Commission  
121 – 7<sup>th</sup> Place East  
St. Paul, MN 55101

via eFiling only

RE: Another Initial Comment of NRG and NO765MN – Ch. 7850 Rulemaking  
PUC Docket R-26-172

Dear Ms. Bergman:

This comment is submitted on behalf of North Route Group and NO765MN.

Approve the Rulemaking Petition and start rulemaking process ASAP.

As noted in the Commission’s Notice, the legislation, Chapter 126, SF4942, was signed on May 22, 2024, and Chapter 127, HF5247, signed on May 23, 2024, and half-heartedly directs the Commission to promulgate rules.

## **216L.26 RULES.**

Subdivision 1. **Commission rules.** The commission, in order to give effect to the purposes of this chapter, may adopt rules consistent with this chapter, including promulgation of site and route designation criteria, the description of the information to be furnished by the utilities, establishment of minimum guidelines for public participation in the development, revision, and enforcement of any rule, plan, or program established by the commission, procedures for the revocation or suspension of a site or route permit, and the procedure and timeliness for proposing alternative routes and sites. A rule adopted by the commission must not grant priority to state-owned wildlife management areas over agricultural lands in the designation of route avoidance areas. Chapter 14 applies to the appeal of rules adopted by the commission to the same extent as it applies to review of rules adopted by any other agency of state government.

The statutory language uses “may” and not “shall,” giving the Commission an out. The Commission has not initiated rulemaking, and I’m mindful of the 2005 legislative changes, with

rulemaking held off until 2012 (!), and then tossed in the circular bin without much apparent thought by Commissioners. That action made no sense. Given all the time that has passed, I looked at the “Topic(s) Open for Comment” and found this:

- **Should the Commission grant or deny the petition for rulemaking?**

Again, why is this a question?

I cannot get over my surprise that denying the Petition, and I presume not proceeding with rulemaking, is regarded as an option.

I’ve been to many transmission meetings and open houses for new transmission lines in four dockets this month, Iron Range to Arrowhead 345kV CN-25-111 and TL-25-112; Maple River to Cuyuna 345kV CN-25-109 and TL-25-110; PowerOn Midwest 765kV CN-25-117; and Gopher to Badger 765kV CN-25-121. It’s been a busy month. Maybe you have to be there to appreciate the scale of this transmission buildout. Some Commissioners have been, and I hope noted that all of the meetings were packed with concerned Minnesotans.

Rulemaking and rules are necessary if you’re going to be siting all this transmission, and I doubt you’ll be denying any of these Certificate of Need applications. The Commission is the regulator. It is not for MISO to decide whether a line is needed under Minnesota law.

Very truly yours,



Carol A. Overland  
Attorney for NRG and NO765MN