MINNESOTA
PUBLIC UTILITIES COMMISSION

NEW DECISION OPTION
Proposed by Commissioner Tuma
April 9, 2026

DOCKET NUMBER	**ET3,E002/CN-25-121**
ANALYST	**Sam Lobby**
DATE/TIME SUBMITTED	**April 6, 2026 2:00 PM**
TITLE	**Tuma New 11.A**
ATTACHMENT	No
SUBJECT	In the Matter of the Application for a Certificate of Need for the Gopher to Badger Link 765 kV High Voltage Transmission Line Project.

Tuma New 11. A - Applicants shall file into the docket answers to the following:

a. What are the electrical engineering limitations and safe distances that a 765/161kV double circuit transmission line can be constructed from an existing wind turbine or solar facility? Are there any North American Electric Reliability Corporation (NERC) or other electrical standards that establish appropriate distances from wind turbines and solar facilities for a 765kV double circuit transmission line?

b. Relating to the type of structures described in (d) below, what general criteria would be applied when running a 765/161kV double circuit transmission line through or next to existing wind farms or solar facilities?

c. Provide several proof of concept examples in Segment 1 (between the North Rochester Substation and a point near Marion, Minnesota) of three 765 kV transmission line structures (the proposed lattice structure, tubular steel monopole under 200 feet and tubular steel H-frame – see Table 7.6-1 of the Application) moving through an area covering four sections of land (a section being approximately 640 acres in a typical township division) a rural mostly agricultural cross-section. This filing should show (1) the 765kV transmission line routing practices the Applicants will use for each particular structure as the line moves through that landscape, and (2) what the viewshed would look like at distances of a quarter mile, a half mile, and a mile from the structures. The purpose is to identify how each of the proposed structures would comparatively mitigate impacts on agricultural and on human residences and structures across these representative landscapes.

d. Likewise provide a similar analysis for Segment 2 (between Marion, Minnesota, to the Minnesota/Wisconsin state line) of three double circuited 765/161 kV transmission line structures (guyed lattice structures, self-supporting horizontal lattice towers and steel tubular H-frame structures – see Figure 7.6-3 of the Application). For this segment it should include a minimum of two proofs of concept - one depicting areas of flatter agricultural landscapes on the western part of the segment and one depicting an area more in the Bluff Country on the eastern portion of the segment. Additionally for this segment provide visual comparisons to the 161kV line being replaced.

e. Provide the best technical literature on the best ways to modify agricultural practices around the proposed lattice structure, tubular steel monopole under 200 feet, tubular steel H-frame and guyed lattice structures for the 765 kV and 765/161kV transmission line structures.

f. Provide a thorough discussion of what will happen to existing structure foundations from the line being replaced particularly as it relates to agricultural fields.

g. For each of the proof of concept examples in (c and d), estimate the number of agricultural acres per mile that would be lost to production when best management practices are used around the three types of identified structures, and describe the methodology used to determine the estimates.