



September 24, 2025

—Via Electronic Filing—

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

RE: REPLY COMMENTS ON NOTICE PLAN

IN THE MATTER OF THE APPLICATION FOR A CERTIFICATE OF NEED FOR THE
BISON TO ALEXANDRIA SECOND CIRCUIT 345 kV TRANSMISSION LINE
PROJECT

DOCKET No. E002, ET2, E015, E017, ET6135/CN-25-116

Dear Ms. Bergman:

Northern States Power Company, doing business as Xcel Energy, Great River Energy, Minnesota Power, Otter Tail Power Company, and Western Minnesota Municipal Power Agency (together, the Utilities) respectfully submit these reply comments to the Minnesota Public Utilities Commission (Commission) concerning the Notice Plan filed by the Utilities on August 15, 2025 for the Bison-Alexandria 345 kilovolt (kV) transmission line project (Project). The Project involves adding a new 345 kV transmission circuit on existing transmission line structures from the existing Bison Substation near Fargo, North Dakota to the existing Alexandria Substation near Alexandria, Minnesota. The existing 345 kV structures were previously permitted and constructed as double-circuit capable as part of the Fargo – St. Cloud 345 kV Transmission Project (Fargo Project).¹

Initial comments regarding the Notice Plan were filed by the Department of Commerce (Department)² and No CapX 2020.³ The Utilities respond to these commenters in turn below.

¹ *In the Matter of the Application for a Route Permit for the Fargo – St. Cloud 345 kV Transmission Project*, Docket No. E002, ET2/TL-09-1056, FINDING OF FACT, CONCLUSIONS OF LAW, AND ORDER ISSUING AN HVTL ROUTE PERMIT TO XCEL ENERGY AND GREAT RIVER ENERGY (June 24, 2011).

² *In the Matter of the Application for Certificate of Need for the Bison to Alexandria Second Circuit 345 kV Transmission Line Project*, Docket No. E002, ET2, E017, ET6135/CN-25-116, DEPARTMENT INITIAL COMMENTS (Sept. 3, 2025).

³ *In the Matter of the Application for Certificate of Need for the Bison to Alexandria Second Circuit 345 kV Transmission Line Project*, Docket No. E002, ET2, E017, ET6135/CN-25-116, NO CAPX2020 INITIAL COMMENTS (Aug. 29, 2025).

Department

After careful review of the Notice Plan against the Minnesota rule requirements, the Department recommends approval of the Notice Plan with three minor modifications: (1) add Evansville and Brandon townships to the list of local government units; (2) use the name “Ojibwe” rather than “Chippewa” in all future mailings, unless otherwise directed by tribal representatives; and (3) revise the direct mail and newspaper notices to state that the Commission will prepare the environmental report. The Utilities appreciate the Department’s thorough review of their proposed Notice Plan and agree with the Department’s three proposed modifications.

No CapX 2020

In its August 28, 2025 comments, No CapX 2020 recommends two modifications to the proposed Notice Plan. First, No CapX 2020 recommends that notice be provided, as part of the Notice Plan, to all the “intervenor and commenters” who participated in the route permit proceeding for the Fargo Project. The Utilities do not believe that adding this additional group to the proposed Notice Plan would be beneficial. First, to the extent that those that participated in route permit proceeding for the Fargo Project still live in the area, they will be provided notice through the proposed Notice Plan as the Utilities will send direct mail notice to all landowners and mailing addresses within 0.5 miles of the Fargo Project’s existing centerline. In addition, to the extent that these persons live outside this notice area, newspaper notices will run in local papers and the Star Tribune informing interested persons of the proposed Project. Through these new notices, interested parties will be able to be informed of the new Project and provided information about how to sign up for future notices.⁴ Next, the route permit proceeding for the Fargo Project concluded over 14 years ago and the contact information for many of the parties on those prior service lists are likely out of date. The Utilities therefore request that No CapX 2020’s recommendation to add the “intervenor and commenters” who participated in the route permit proceeding for the Fargo Project to this Project’s Notice Plan be rejected.

Next, No CapX 2020 recommends that the Commission deny the Utilities’ request for a variance of Minn. R. 7829.2500, subp. 5 that requires an applicant to publish notice of the filing of the Certificate of Need application in a newspaper of general circulation throughout the state. No CapX 2020 opposes this variance because Certificate of Need

⁴ *In the Matter of the Application for Certificate of Need for the Bison to Alexandria Second Circuit 345 kV Transmission Line Project*, Docket No. E002, ET2, E017, ET6135/CN-25-116, NOTICE PLAN PETITION at 6 (Aug. 29, 2025).

proceedings “receive too little attention.”⁵ As stated in the Utilities’ Notice Plan petition, the Utilities are not requesting this variance to limit the amount of notice provided but rather are requesting the variance due to the fact that the newspaper notice published as part of the Notice Plan could be published as soon as two weeks prior to the filing of the Certificate of Need application. Providing two different newspaper notices about the Project within a two week period is potentially confusing to interested persons and has limited value. The Utilities continue to request that the Commission grant the requested variance to Minn. R. 7829.2500, subp. 5.

We have electronically filed this document with the Commission, and copies have been served on the parties on the attached service lists. Please contact Jody Londo at jody.l.londo@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/ Bria Shea

BRIA SHEA
REGIONAL VICE PRESIDENT, REGULATORY POLICY
NORTHERN STATES POWER COMPANY

cc: Service List

⁵ *In the Matter of the Application for Certificate of Need for the Bison to Alexandria Second Circuit 345 kV Transmission Line Project*, Docket No. E002, ET2, E017, ET6135/CN-25-116, NO CAPX2020 INITIAL COMMENTS at 3 (Aug. 29, 2025).

IN THE MATTER OF THE APPLICATION FOR
A CERTIFICATE OF NEED FOR THE BISON
TO ALEXANDRIA SECOND CIRCUIT 345 kV
TRANSMISSION LINE PROJECT

DOCKET NO. E002, ET2, E015, E017,
ET6135/CN-25-116

CERTIFICATE OF SERVICE

Gustav Gerhardson certifies that on the 24th day of September, 2025, on behalf of Northern States Power Company, doing business as Xcel Energy, Great River Energy, Minnesota Power, Otter Tail Power Company, and Western Minnesota Municipal Power Agency, he efiled a true and correct copy of the **Reply Comments on Notice Plan** by posting the same on [eDockets](#). Said filing is also served as designated on the attached Service List on file with the Minnesota Public Utilities Commission in the above-referenced docket number.

/s/ Gustav Gerhardson
Gustav Gerhardson

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP		50 S 6th St Ste 1500 Minneapolis MN, 55402-1498 United States	Electronic Service		No	CN-25-116
2	Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	CN-25-116
3	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission		Electronic Service		No	CN-25-116
4	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	CN-25-116
5	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	CN-25-116
6	James	Canaday	james.canaday@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota St. St. Paul MN, 55101 United States	Electronic Service		No	CN-25-116
7	Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	CN-25-116
8	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	CN-25-116
9	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St, Louis MO, 63119-2044 United States	Electronic Service		No	CN-25-116
10	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	CN-25-116
11	Hillary	Creurer	hcreurer@allete.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	CN-25-116
12	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	CN-25-116
13	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	CN-25-116

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
39	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	CN-25-116
40	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	CN-25-116
41	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	CN-25-116
42	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	CN-25-116
43	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	CN-25-116
44	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	CN-25-116
45	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	CN-25-116
46	Priti	Patel	ppatel@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369-4718 United States	Electronic Service		No	CN-25-116
47	Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	CN-25-116
48	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		No	CN-25-116
49	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	CN-25-116
50	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	CN-25-116
51	Susan	Romans	sromans@allete.com	Minnesota Power		30 West Superior Street Legal Dept Duulth MN,	Electronic Service		No	CN-25-116

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
64	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	CN-25-116
65	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	CN-25-116