

February 23, 2026

Sasha Bergman
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: Comments of the Minnesota Department of Commerce
Docket No. E002, ET2, ET6675/CN-25-117

Dear Ms. Bergman:

Attached are the comments of the Minnesota Department of Commerce (Department) in the following matter:

*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.*

The petition was filed by Great River Energy, ITC Midwest LLC, and Northern States Power Company, doing business as Xcel Energy on February 3, 2026.

The Department recommends **the petition be declared substantially complete** and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Dr. SYDNIE LIEB
Assistant Commissioner of Regulatory Analysis

DZ/RP
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. E002, ET2, ET6675/CN-25-117

I. INTRODUCTION

Northern States Power Company, doing business as Xcel Energy (Xcel), Great River Energy (GRE), and ITC Midwest LLC, (collectively, the Applicants) submitted to the Minnesota Public Utilities Commission (Commission) the Applicants' *Certificate of Need* (CN or petition) for the proposed PowerOn Midwest 765 kilovolt (kV) and 345 kV Transmission Project.¹ PowerOn Midwest is the first 765 kV transmission line proposed in Minnesota and would provide transmission infrastructure from the South Dakota/Minnesota border to North Rochester (Attachment 2). The proposed 345 kV portion of the project has an in-service date of 2032, and the proposed 765 kV portion has an in-service date of 2034.

The proposed PowerOn Midwest Transmission Line (project) consists of:

- A new 92-mile-long 765 kV transmission line from the South Dakota/Minnesota state border to the Lakefield Junction Substation in Jackson County, Minnesota.
- A new 18-mile-long 765 kV transmission line from the Iowa/Minnesota state boarder to the Lakefield Junction Substation in Jackson County, Minnesota.
- A new 130-mile-long 765 kV transmission line from the Lakefield Junction Substation in Jackson County, Minnesota to the Pleasant Valley Substation in Mower County, Minnesota.
- A new 31-mile-long 765 kV transmission line from the Pleasant Valley Substation in Mower County, Minnesota to the North Rochester Substation in Goodhue County, Minnesota.
- A new 31-mile-long 345 kV circuit from the Pleasant Valley Substation in Mower County, Minnesota to the North Rochester Substation in Goodhue County, Minnesota that replaces existing single-circuit structures with new double-circuit capable structures.
- A new 38-mile-long 345 kV circuit from the North Rochester Substation in Goodhue County, Minnesota to the Hampton Substation in Dakota County, Minnesota that uses the existing double-circuit capable structures.
- Expansions and upgrades at Lakefield Junction, Pleasant Valley, North Rochester, and Hampton Substations.

The project was studied, reviewed, and approved as part of the Midcontinent Independent System Operator's (MISO) Tranche 2.1 Portfolio to serve as a backbone to the grid to increase system reliability. Even though the project was addressed at the regional level, reviewing the Applicant's petition through the CN process gives the Commission the opportunity to weigh in on behalf of Minnesota's ratepayers. It is essential that the Commission and other state agencies have the authority to advocate for Minnesota's ratepayers.

¹ *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*, GRE, ITC Midwest, and Xcel, Initial Filing, February 9, 2026, Docket No. E002, ET6675/CN-25-117, (eDockets) [20262-227787-02](#) (hereinafter "Petition").

As demand for electricity increases and the type and amount of generating resources interconnecting to the grid grows, customer demand must continue to be served reliably. The Applicants believe the project is necessary to maintain system reliability to meet future energy needs, meet growing electricity demand cost-effectively, and support the transition to a carbon-free Minnesota.

II. PROCEDURAL BACKGROUND

February 7, 2025	The Applicants filed a Notice of Intent to Construct the proposed project. ²
October 1, 2025	The Applicants filed a petition requesting approval of exemptions to data requirements for a future CN petition for the proposed project. ³
October 1, 2025	The Applicants filed a Notice Plan petition, providing a plan to notify potentially affected members of the public about the proposed project. ⁴
November 26, 2025	The Commission ordered the approval of the Applicants' exemption petition with modifications and notice plan petition. ⁵
February 3, 2026	The Applicants filed the petition requesting approval of a CN for the proposed project. ⁶
February 9, 2026	The Commission issued a notice of comment period on the completeness of the petition. ⁷

Topics open for comment:

- Does the Certificate of Need application contain the information required by Minnesota Rule chapter 7849.0220, Subp. 2?
- Are there any contested issues of fact with respect to the representations made in the application?
- Should the application be evaluated using the Commission's informal process or referred to the Court of Administrative Hearings for contested case proceedings?

² *Notice of Intent to Construct, Own, and Maintain the Brookings County – Lakefield Junction 765 kV Transmission Line Project*, Xcel and ITC Midwest, Initial Filing, February 7, 2025, Docket No. E002, ET6685/CN-25-117, (eDockets) [20252-215101-01](#).

³ *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*, GRE, ITC Midwest, and Xcel, Exemption Request, October 1, 2025, Docket No. E002, ET6675/CN-25-117, (eDockets) [202510-223482-03](#), (hereinafter "Exemption Request").

⁴ *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*, GRE, ITC Midwest, and Xcel, Notice Plan Petition, October 1, 2025, Docket No. E002, ET6675/CN-25-117, (eDockets) [202510-223482-02](#).

⁵ *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*, Order, November 26, 2025, Docket No. E002, ET6675/CN-25-117, (eDockets) [202511-225329-01](#), (hereinafter "Exemption and Notice Plan Order").

⁶ Petition.

⁷ *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*, Notice of Comment Period, February 9, 2026, Docket No. E002, ET6675/CN-25-117, (eDockets) [20262-227934-01](#).

- Are there other issues or concerns related to this matter?

III. DEPARTMENT ANALYSIS

A. COMPLETENESS REVIEW

The first Notice topic is “Does the Certificate of Need application contain the information required by Minnesota Rule chapter 7849.0220, Subp. 2?”

Minnesota Rules 7849.0220, Subp. 2, states that each CN application for large high voltage transmission lines (LHVTL) “shall include all of the information required by parts 7849.0240 and 7849.0260 to 7849.0340.” However, Minnesota Rules 7849.0200, Subp. 6, allows for exemptions from any of the content requirements of CN applications if the applicant demonstrates that the requirement is not necessary for determining whether the facility is needed. Applicants filed an exemption request on October 1, 2025.⁸ The Commission approved the Applicants’ Exemption Petition with modifications.⁹

The Department reviewed the petition for completeness considering the rule requirements and the Exemption Order. Attached is a table summarizing the Department’s completeness review of the petition (Attachment 1). The table indicates data and information required by Minnesota Rules, the location of data and information in the petition, the location of alternative data if the Applicant was granted an exemption to the applicable Minnesota Rule, and whether the petition contains the relevant data and information.

The Department concludes that the Applicants’ petition is **substantially complete upon submission of additional information**. This conclusion only addresses completeness, an administrative determination of the information provided.

B. CONTESTED ISSUES OF FACT

The second notice topic asks if there are any “Are there any contested issues of fact with respect to the representations made in the application?”

The Department is unaware of any contested issues of fact pertaining to completeness of the petition. The Department believes the Commission’s informal process of comments and reply comments will be sufficient to develop and address issues in this proceeding.

C. INFORMAL PROCESS OR CONTESTED CASE

⁸ Exemption Request.

⁹ Exemption and Notice Plan Order.

The third notice topic is “Should the application be evaluated using the Commission’s informal process or referred to the Court of Administrative Hearings for contested case proceedings?”

Contested cases are generally recommended when there are contested issues of fact, procedural concerns, or other significant unresolved issues for an Administrative Law Judge to address. The Department is not aware of any contested issues or procedural concerns that would merit referring the application to the Court of Administrative Hearings for contested case proceedings at this time.

D. OTHER ISSUES

The fourth notice topic is “Are there other issues or concerns related to this matter?”

In reviewing the application for completeness, the Department found items that may be erroneous, unclear or lacking. The following comments and questions are still relevant to the filed application.

- Completion Checklist (Appendix A):
 1. Can the Applicants ensure that the completeness checklist matches the location of the information or data in the petition? This allows for more efficient review by the Department, and better information for the public.
- Minn. R. 7849.0240 subp.1:¹⁰
 1. The Applicants claim they have “squeezed every drop” of capacity out of existing lines, and new lines are proposed only after all other options have been exhausted. If this were the case, the Applicants would have upgraded all their existing lines with grid enhancing technologies (GETs) or advanced reconductoring.

The Applicants point to congestion as one of the primary needs of the project. The Department understands that GETs could not achieve the same congestion mitigation benefits as the proposed project, but that does not mean that GETs should not be utilized on existing lines. If congestion is currently one of the main challenges facing the electric grid and could be mitigated with greater line

¹⁰ Refer to the Departments initial comments in Docket No. M-25-99 for more information regarding the GETs Report.

capacity why did Xcel Energy, GRE, and other MTO only identify 12 solutions in the 2025 GETs Report?¹¹

Can the Applicants explain how GETs and other upgrades such as, but not limited to, advanced reconductoring, could increase capacity, and the potential costs compared to a rebuild or new line construction, like the proposed project?

2. The Applicants cite ambient adjusted ratings (AARs) as one of their initiatives to “squeeze every drop” of capacity out of existing lines. In 2021 the Federal Energy Regulatory Commission (FERC) ordered¹² transmission lines use AARs to increase capacity. Compliance with a federal regulation is not a novel initiative, and the Applicants should not be given credit for an upgrade they are required by FERC to do.
 3. The Applicants stating that the 2025 GETs Report addresses 30 additional solutions is misleading. The 2025 GETs Report only identified 12 constraints where a new solution is identified and the proposal meets the payback period. The other 18 solutions were pulled from the Grid North Partners study from 2023.
 4. Could GETs be used to upgrade the proposed project after the in-service date?
 5. How could GETs be used during the construction of the proposed project to mitigate congestion and curtailment caused by forced outages?
 6. How many MWs of low-cost power could the project free up?
- Minn. R. 7849.0240 subp.2 item A:
 1. The only societally beneficial use of the project that the Applicants specifically refer to is carbon reduction benefits. Can the Applicants point to any other societal benefits of the project? The proposed project claims to reduce congestion. This would theoretically help

¹¹ *In the Matter of the 2025 Minnesota Biennial Transmission Projects Report*. Minnesota Transmission Owners, Grid Enhancing Technologies Study Report, October 31, 2025, Docket No. E999/M-25-99, (eDockets) [202510-224474-04](#) at Appendix B.

¹² FERC Order No. 881.

to reduce rates and allow the lowest price renewable resources to reach the load, is that not a societal benefit?

2. The project could also reduce the curtailment of wind energy from southeast Minnesota, an issue that the state has been facing for years.¹³ Can the Applicants provide an economic analysis of how the project prevents curtailment and increases revenue to counties in the form of wind production tax credits?
 3. A large portion of the proposed route will be in southeast Minnesota. Will the communities there benefit from infrastructure they are housing?
- Minn. R. 7849.0260 item A(2):
 1. The Applicants say the project will use ACSR Bunting conductor, or a similar performing conductor. Why wouldn't the project be able to use the Bunting Conductor and can you give examples of a similar conductor? Would there be a substantial price difference for an alternative conductor?
 - Minn. R. 7849.0260 item A(6):
 1. The affected counties are mentioned several times throughout the petition, but a simple table listing the counties would be helpful.
 - Minn. R. 7849.0260 item B(2) and Minn. R. 7849.0260 item B(8):
 1. Can the Applicants explain how GETs could increase reliability, mitigate curtailment and reduce congestion as an alternative to the proposed project? Additionally, how could battery energy storage systems, combined with GETs, serve as a reasonable combination of alternatives to the proposed project?
 - Minn. R. 7849.0260 item C(4) and Minn. R. 7849.0260 item C(5):
 1. Do the Applicants include operations and maintenance costs in the total project costs? As per their exemption, Xcel Energy provided an annual revenue requirement, and notes that the revenue

¹³ *In the Matter of the Investigation into Transmission-Curtailment Matters, Drivers, and Potential Solutions to Limitations Resulting from the Nobles County Substation*, Minnesota Department of Commerce, Comments, Docket No. E-999/CI-24-316, October 23, 2024, (eDockets) [202410-211261-02](#).

requirement calculations do not account for future O&M costs. How does Xcel Energy, and the Applicants generally, plan on accounting for operations and maintenance costs?

2. Appendix D, Xcel Energy's annual revenue requirement, has no cover letter or explanation. The Appendix includes several tables with no captions or information. The only explanation of the Appendix is one paragraph in the petition. Can the Applicants respond to these comments with an updated Appendix D?

- Minn. R. 7849.0330 item D:

1. What is the Applicants plan if the South Dakota or Iowa sections of the project are completed before or after the Minnesota segments? If the Minnesota segment is completed first, is it energized, or will all segments have to be built for the project to be energized? Are the Applicants communicating with other states' utilities to coordinate this?

IV. DEPARTMENT RECOMMENDATIONS

Based on the Departments analysis of the petition, the information in the record, and the Department's review of the petition, the Department has prepared one recommendation which is provided below.

A. COMPLETENESS REVIEW

- The Department finds the application includes information that addresses Minnesota Rule chapter 7849.0220, Subp.2 and recommends declaring the application substantially complete.

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Analyst(s) assigned: Daniel Zuckerman, Rock Park

Attachment 1 – Completeness Checklist

Attachment 2 – Project Map¹⁴

¹⁴ Petition at 25.

Minnesota Rule	Short Description	Rule Text	Location	Complete?	Comments and Questions
Not a rule	Pre Application Checklist	In table form, a pre application checklist that includes the rule, text, and where we can find it in application.	Appendix A	Partial	1. Can the Applicants ensure that the completeness checklist matches the location of the information or data in the petition? This allows for more efficient review by the Department, and better information for the public.
7849.0240 (1)	Need Summary	An application must contain a summary of the major factors that justify the need for the proposed facility. This summary must not exceed, without the approval of the commission, 15 pages in length, including text, tables, graphs, and figures.	1.4 and 1.5	Partial	<p>1. The Applicants claim they have “squeezed every drop” of capacity out of existing lines, and new lines are proposed only after all other options have been exhausted. If this were the case, the Applicants would have upgraded all their existing lines with grid enhancing technologies (GETs) or advanced reconductoring.</p> <p>The Applicants point to congestion as one of the primary needs of the project. The Department understands that GETs could not achieve the same congestion mitigation benefits as the proposed project, but that does not mean that GETs should not be utilized on existing lines. If congestion is currently one of the main challenges facing the electric grid and could be mitigated with greater line capacity why did Xcel Energy, GRE, and other MTO only identify 12 solutions in the 2025 GETs Report?</p> <p>Can the Applicants explain how GETs and other upgrades such as, but not limited to, advanced reconductoring, could increase capacity, and the potential costs compared to a rebuild or new line construction, like the proposed project?</p> <p>2. The Applicants cite ambient adjusted ratings (AARs) as one of their initiatives to “squeeze every drop” of capacity out of existing lines. In 2021 the Federal Energy Regulatory Commission (FERC) ordered transmission lines use AARs to increase capacity. Compliance with a federal regulation is not a novel initiative, and the Applicants should not be given credit for an upgrade they are required by FERC to do.</p> <p>3. The Applicants stating that the 2025 GETs Report addresses 30 additional solutions is misleading. The 2025 GETs Report only identified 12 constraints where a new solution is identified and the proposal meets the payback period. The other 18 solutions were pulled from the Grid North Partners study from 2023.</p> <p>4. Could GETs be used to upgrade the proposed project after the in-service date?</p> <p>5. How could GETs be used during the construction of the proposed project to mitigate congestion and curtailment caused by forced outages?</p> <p>6. How many MWs of low-cost power could the project free up?</p>
7849.0240(2)	Additional Considerations	Each application shall contain an explanation of the relationship of the proposed facility to each of the following socioeconomic considerations:			
7849.0240(2)(A)	Socially Beneficial Uses	socially beneficial uses of the output of the facility, including its uses to protect or enhance environmental quality;	6.5.3	Partial	<p>1. The only societally beneficial use of the project that the Applicants specifically refer to is carbon reduction benefits. Can the Applicants point to any other societal benefits of the project? The proposed project claims to reduce congestion. This would theoretically help to reduce rates and allow the lowest price renewable resources to reach the load, is that not a societal benefit?</p> <p>2. The project could also reduce the curtailment of wind energy from southeast Minnesota, an issue that the state has been facing for years. Can the Applicants provide an economic analysis of how the project prevents curtailment and increases revenue to counties in the form of wind production tax credits?</p> <p>3. A large portion of the proposed route will be in southeast Minnesota. Will the communities there benefit from infrastructure they are housing?</p>
7849.0240(2)(B)	Promotional Activities	promotional activities that may have given rise to the demand for the facility;	6.8	Yes	
7849.0240(2)(C)	Future Development	the effects of the facility in inducing future development.	6.9	Yes	
7849.0260	Project Description	Each application for a proposed LHVTL must include:			
7849.0260(A)	Description of Facility	a description of the type and general location of the proposed line, including:			
7849.0260(A)(1)	Design Voltage	the design voltage;	2.2	Yes	
7849.0260(A)(2)	Conductors	the number, the sizes, and the types of conductors;	2.2.3	Partial	1. The Applicants say the project will use ACSR Bunting conductor, or a similar performing conductor. Why wouldn't the project be able to use the Bunting Conductor and can you give examples of a similar conductor? Would there be a substantial price difference for an alternative conductor?
7849.0260(A)(3)	Line Losses	the expected losses under projected maximum loading and under projected average loading in the length of the transmission line and at the terminals or substations;	Alternative data in 6.6.3	Yes	
7849.0260(A)(4)	Length	the approximate length of the proposed transmission line and the portion of that length in Minnesota;	1.2.1	Yes	

Minnesota Rule	Short Description	Rule Text	Location	Complete?	Comments and Questions
7849.0260(A)(5)	Terminal Location	the approximate location of DC terminals or AC substations, which information shall be on a map of appropriate scale;	Figure 1.8-1 and Section 2.3	Yes	
7849.0260(A)(6)	Affected Counties	a list of all counties reasonably likely to be affected by construction and operation of the proposed line;	Executive Summary, 1.2 and Section 2	Yes	1. The affected counties are mentioned several times throughout the petition, but a simple table listing the counties would be helpful.
7849.0260(B)	Description of Alternatives	a discussion of the availability of alternatives to the facility, including but not limited to:			
7849.0260(B)(1)	New Generation	new generation of various technologies, sizes, and fuel types;	7.3	Yes	
7849.0260(B)(2)	Upgrade Existing Facility	upgrading of existing transmission lines or existing generating facilities;	7.4.1	Partial	1. Can the Applicants explain how GETs could increase reliability, mitigate curtailment and reduce congestion as an alternative to the proposed project? Additionally, how could battery energy storage systems, combined with GETs, serve as a reasonable combination of alternatives to the proposed project?
7849.0260(B)(3)	Different Voltages & Conductors	transmission lines with different design voltages or with different numbers, sizes, and types of conductors;	7.2	Yes	
7849.0260(B)(4)	Different Endpoints	transmission lines with different terminals or substations;	Exempt	Yes	
7849.0260(B)(5)	Double Circuit Existing Lines	double circuiting of existing transmission lines;	7.4.3	Yes	
7849.0260(B)(6)	DC transmission line	if the proposed facility is for DC (AC) transmission, an AC (DC) transmission line;	7.4.4	Yes	
7849.0260(B)(7)	Underground Line	if the proposed facility is for overhead (underground) transmission, an underground (overhead) transmission line;	7.4.5	Yes	
7849.0260(B)(8)	Reasonable Combinations	any reasonable combinations of the alternatives listed in subitems (1) to (7);	7.5 (Exempt for discussing different endpoints)	Partial	Refer to the comments for 7849.0260(B)(2).
7849.0260(C)	Alternatives Details	for the proposed facility and for each of the alternatives provided in response to item B that could provide electric power at the asserted level of need, a discussion of:			
7849.0260(C)(1)	Cost in Current Dollars	its total cost in current dollars;	2.4	Yes	
7849.0260(C)(2)	Service Life	its service life;	3.4.3	Yes	
7849.0260(C)(3)	Average Annual Availability	its estimated average annual availability;	9.5	Yes	
7849.0260(C)(4)	O & M Costs	its estimated annual operating and maintenance costs in current dollars;	2.4.2	Partial	1. Do the Applicants include operations and maintenance costs in the total project costs? As per their exemption, Xcel Energy provided an annual revenue requirement, and notes that the revenue requirement calculations do not account for future O&M costs. How does Xcel Energy, and the Applicants generally, plan on accounting for operations and maintenance costs? 2. Appendix D, Xcel Energy's annual revenue requirement, has no cover letter or explanation. The Appendix includes several tables with no captions or information. The only explanation of the Appendix is one paragraph in the petition. Can the Applicants respond to these comments with an updated Appendix D?
7849.0260(C)(5)	Effect on Rates	an estimate of its effect on rates systemwide and in Minnesota, assuming a test year beginning with the proposed in-service date;	Alternative Data in 2.5 and Appendix D	Partial	
7849.0260(C)(6)	Losses	its efficiency, expressed for a transmission facility as the estimated losses under projected maximum loading and under projected average loading in the length of the transmission line and at the terminals or substations, or expressed for a generating facility as the estimated heat rate;	Alternative data in 6.6.3	Yes	
7849.0260(C)(7)	Major Assumptions	the major assumptions made in providing the information in subitems (1) to (6);	1.6, 2.4.1, 6.2.1, and 7.1	Yes	
7849.0260(D)	System Map	a map (of appropriate scale) showing the applicant's system or load center to be served by the proposed LHVTL	Alternative data in figure 1.8-1	Yes	
7849.0260(E)	Other Relevant Information	such other information about the proposed facility and each alternative as may be relevant to determination of need.	Petition	Yes	

Minnesota Rule	Short Description	Rule Text	Location	Complete?	Comments and Questions
7849.0270(1)	Forecast: Scope	Each application shall contain pertinent data concerning peak demand and annual electrical consumption within the applicant's service area and system, as provided in part 7849.0220, including but not limited to the data requested in subpart 2, item B. When recorded data is not available, or when the applicant does not use the required data in preparing its own forecast, the applicant shall use an estimate and indicate in the forecast justification section in subparts 3 to 6 the procedures used in deriving the estimate. The application shall clearly indicate which data are historical and which are projected. It is expected that data provided by the applicant should be reasonable and internally consistent.	Alternative data in Section 1, 2, 5, 6 and Appendices D and F	Yes	

Minnesota Rule	Short Description	Rule Text	Location	Complete?	Comments and Questions
7849.0270(2)	Forecast Content	For each forecast year, the following data must be provided:			
7849.0270(2)(A)	Annual Consumption	when the applicant's service area includes areas other than Minnesota, annual electrical consumption by ultimate consumers within the applicant's Minnesota service area;	Alternative data in Section 1, 2, 5, 6 and Appendices D and F	Yes	
7849.0270(2)(B)	Number of Customers by Class	for each of the following categories, estimates of the number of ultimate consumers within the applicant's system and annual electrical consumption by those consumers: (1) farm, excluding irrigation and drainage pumping; (2) irrigation and drainage pumping; (3) nonfarm residential; (4) commercial; (5) mining; (6) industrial; (7) street and highway lighting; (8) electrified transportation; (9) other (this category shall include municipal water pumping facilities, oil and gas pipeline pumping facilities, military camps and bases, and all other consumers not reported in subitems (1) to (8)); and (10) the sum of subitems (1) to (9);	Alternative data in Section 1, 2, 5, 6 and Appendices D and F	Yes	
7849.0270(2)(C)	Peak Demand by Class	an estimate of the demand for power in the applicant's system at the time of annual system peak demand, including an estimated breakdown of the demand into the consumer categories listed in item B;	Alternative data in Section 1, 2, 5, 6 and Appendices D and F	Yes	
7849.0270(2)(D)	Monthly Peak Demand	the applicant's system peak demand by month;	Alternative data in Section 1, 2, 5, 6 and Appendices D and F	Yes	
7849.0270(2)(E)	Revenue Req.	the estimated annual revenue requirement per kilowatt hour for the system in current dollars;	Alternative data in Section 1, 2, 5, 6 and Appendices D and F	Yes	
7849.0270(2)(F)	Forecast: Content, Load Factor	the applicant's estimated average system weekday load factor by month; in other words, for each month, the estimated average of the individual load factors for each weekday in the month.	Alternative data in Section 1, 2, 5, 6 and Appendices D and F	Yes	
7849.0270(3)	Forecast Methodology	An applicant may use a forecast methodology of its own choosing, with due consideration given to cost, staffing requirements, and data availability. However, forecast data provided by the applicant is subject to tests of accuracy, reasonableness, and consistency. The applicant shall detail the forecast methodology employed to obtain the forecasts provided under subpart 2, including:			
7849.0270(3)(A)	Overall Framework	A. the overall methodological framework that is used;	Alternative data in Section 1, 2, 5, 6 and Appendices D and F	Yes	
7849.0270(3)(B)	Analytical Techniques	the specific analytical techniques which are used, their purpose, and the components of the forecast to which they have been applied;	Alternative data in Section 1, 2, 5, 6 and Appendices D and F	Yes	
7849.0270(3)(C)	Relation of Techniques	the manner in which these specific techniques are related in producing the forecast;	Alternative data in Section 1, 2, 5, 6 and Appendices D and F	Yes	

Minnesota Rule	Short Description	Rule Text	Location	Complete?	Comments and Questions
7849.0270(3)(D)	Statistical Tests	where statistical techniques have been used: (1) the purpose of the technique; (2) typical computations (e.g., computer printouts, formulas used), specifying variables and data; and (3) the results of appropriate statistical tests;	Alternative data in Section 1, 2, 5, 6 and Appendices D and F	Yes	
7849.0270(3)(E)	Confidence Levels	forecast confidence levels or ranges of accuracy for annual peak demand and annual electrical consumption, as well as a description of their derivation;	Alternative data in Section 1, 2, 5, 6 and Appendices D and F	Yes	
7849.0270(3)(F)	Analysis of Methodology	a brief analysis of the methodology used, including: (1) its strengths and weaknesses; (2) its suitability to the system; (3) cost considerations; (4) data requirements; (5) past accuracy; and (6) other factors considered significant by the applicant;	Alternative data in Section 1, 2, 5, 6 and Appendices D and F	Yes	
7849.0270(3)(G)	Discrepancies	an explanation of discrepancies that appear between the forecasts presented in the application and the forecasts submitted under chapter 7610 or in the applicant's previous certificate of need proceedings.	Alternative data in Section 1, 2, 5, 6 and Appendices D and F	Yes	
7849.0270(4)	Forecast Data Bases: List	The applicant shall discuss the data base used in arriving at the forecast presented in its application, including:			
7849.0270(4)(A)	Forecast Data Bases: List	a complete list of all data sets used in making the forecast, including a brief description of each data set and an explanation of how each was obtained, (e.g., monthly observations, billing data, consumer survey, etc.) or a citation to the source (e.g., population projection from the state demographer's office);	Alternative data in Section 1, 2, 5, 6 and Appendices D and F	Yes	
7849.0270(4)(B)	Forecast Data Bases: Adjustments	a clear identification of any adjustments made to raw data in order to adapt them for use in forecasts, including: (1) the nature of the adjustment; (2) the reason for the adjustment; and (3) the magnitude of the adjustment. The applicant shall provide to the commission or the administrative law judge on demand copies of the data sets used in making the forecasts, including both raw and adjusted data, input and output data.	Alternative data in Section 1, 2, 5, 6 and Appendices D and F	Yes	
7849.0270(5)	Forecast Assumptions	The applicant shall discuss each essential assumption made in preparing the forecast, including the need for the assumption, the nature of the assumption, and the sensitivity of forecast results to variations in the essential assumptions. The applicant shall discuss the assumptions made regarding:			
7849.0270(5)(A)	Energy Sources	the availability of alternate sources of energy;	Alternative data in Section 1, 2, 5, 6 and Appendices D and F	Yes	
7849.0270(5)(B)	Fuel Switching	the expected conversion from other fuels to electricity or vice versa;	Alternative data in Section 1, 2, 5, 6 and Appendices D and F	Yes	
7849.0270(5)(C)	Energy Prices	future prices of electricity for customers in the applicant's system and the effect that such price changes will likely have on the applicant's system demand;	Alternative data in Section 1, 2, 5, 6 and Appendices D and F	Yes	

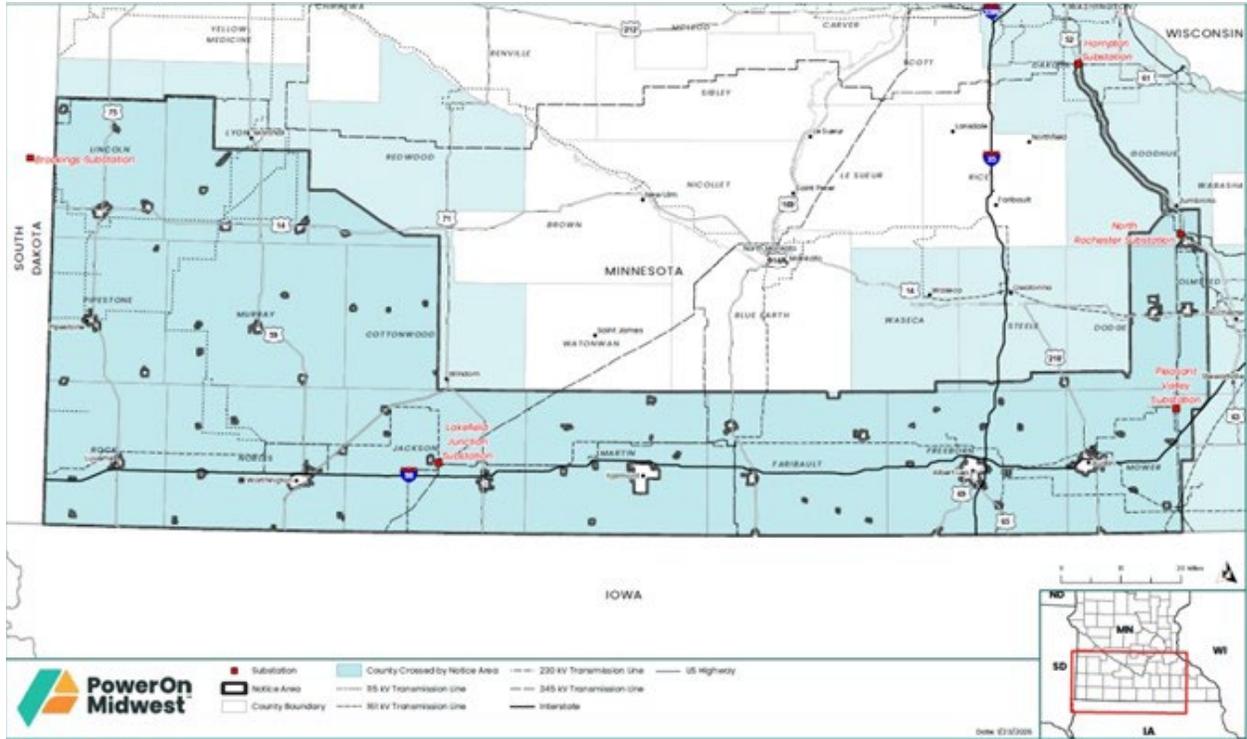
Minnesota Rule	Short Description	Rule Text	Location	Complete?	Comments and Questions
7849.0270(5)(D)	Data Availability	the data requested in subpart 2 that is not available historically or not generated by the applicant in preparing its own internal forecast;	Alternative data in Section 1, 2, 5, 6 and Appendices D and F	Yes	
7849.0270(5)(E)	Conservation	the effect of energy conservation programs on long-term electrical demand	Alternative data in Section 1, 2, 5, 6 and Appendices D and F	Yes	
7849.0270(5)(F)	Other Factors	any other factor considered by the applicant in preparing the forecast.	Alternative data in Section 1, 2, 5, 6 and Appendices D and F	Yes	
7849.0270(6)	Forecast Coordination	The applicant shall provide:			
7849.0270(6)(A)	Forecast Coordination: Extent	a description of the extent to which the applicant coordinates its load forecasts with those of other systems, such as neighboring systems and associate systems in a power pool or coordinating organization;	Section 5 and Appendix F	Yes	
7849.0270(6)(B)	Forecast Coordination: Manner	a description of the manner in which such forecasts are coordinated, and any problems experienced in efforts to coordinate load forecasts.	Section 5 and Appendix F	Yes	
7849.0280	System Capacity	The applicant shall describe the ability of its existing system to meet the demand for electrical energy forecast in response to part 7849.0270 and the extent to which the proposed facility will increase this capability. In preparing this description, the applicant shall present the following information:			
7849.0280(A)	Power Planning Programs	A. a brief discussion of power planning programs, including criteria, applied to the applicant's system and to the power pool or area within which the applicant's planning studies are based;	1.4.2.2, 5.1, 5.2, 5.3, 6.2.1, and 6.6	Yes	
7849.0280(B)	Firm Transactions	the applicant's seasonal firm purchases and seasonal firm sales for each utility involved in each transaction for each of the forecast years;	Exempt	Exempt	
7849.0280(C)	Participation Transactions	the applicant's seasonal participation purchases and seasonal participation sales for each utility involved in each transaction for each of the forecast years;	Exempt	Exempt	
7849.0280(D)	Load and Capability Table, Existing System	for the summer season and for the winter season corresponding to each forecast year, the load and generation capacity data requested in subitems (1) to (13), including the anticipated purchases, sales, capacity retirements, and capacity additions, except those that depend on certificates of need not yet issued by the commission: (1) seasonal system demand; (2) annual system demand; (3) total seasonal firm purchases; (4) total seasonal firm sales; (5) seasonal adjusted net demand (subitem (1) minus subitem (3) plus subitem (4)); (6) annual adjusted net demand (subitem (2) minus subitem (3) plus subitem (4)); (7) net generating capacity; (8) total participation purchases; (9) total participation sales; (10) adjusted net capability (subitem (7) plus subitem (8) minus subitem (9)); (11) net reserve capacity obligation; (12) total firm capacity obligation (subitem (5) plus subitem (11)); and (13) surplus or deficit (-) capacity (subitem (10) minus subitem (12));	Exempt	Exempt	
7849.0280(E)	Load and Capability Table, With Proposed Facility	for the summer season and for the winter season corresponding to each forecast year subsequent to the year of application, the load and generation capacity data requested in item D, subitems (1) to (13), including purchases, sales, and generating capability contingent on the proposed facility;	Exempt	Exempt	

Minnesota Rule	Short Description	Rule Text	Location	Complete?	Comments and Questions
7849.0280(F)	Load and Capability Table, With All Future Generation	for the summer season and for the winter season corresponding to each forecast year subsequent to the year of application, the load and generation capacity data requested in item D, subitems (1) to (13), including all projected purchases, sales, and generating capability;	Exempt	Exempt	
7849.0280(G)	Proposed Additions and Retirements	for each of the forecast years subsequent to the year of application, a list of proposed additions and retirements in net generating capability, including the probable date of application for any addition that is expected to require a certificate of need;	Exempt	Exempt	
7849.0280(H)	Monthly Data	for the previous calendar year, the current year, the first full calendar year before the proposed facility is expected to be in operation and the first full calendar year of operation of the proposed facility, a graph of monthly adjusted net demand and monthly adjusted net capability, as well as a plot on the same graph of the difference between the adjusted net capability and actual, planned, or estimated maintenance outages of generation and transmission facilities; and	Exempt	Exempt	
7849.0280(I)	Reserve Margin Discussion	a discussion of the appropriateness of and the method of determining system reserve margins, considering the probability of forced outages of generating units, deviation from load forecasts, scheduled maintenance outages of generation and transmission facilities, power exchange arrangements as they affect reserve requirements, and transfer capabilities.	Exempt	Exempt	
7849.0290	Conservation Programs	An application must include:			
7849.0290(A)	Conservation Programs	the name of the committee, department, or individual responsible for the applicant's energy conservation and efficiency programs, including load management;	Alternative data in Section 5, 7 and Appendices D and G	Yes	
7849.0290(B)	Conservation Programs: Goals	a list of the applicant's energy conservation and efficiency goals and objectives;	Alternative data in Section 5, 7 and Appendices D and G	Yes	
7849.0290(C)	Conservation Programs: List	a description of the specific energy conservation and efficiency programs the applicant has considered, a list of those that have been implemented, and the reasons why the other programs have not been implemented;	Alternative data in Section 5, 7 and Appendices D and G	Yes	
7849.0290(D)	Conservation Programs: Accomplishments	a description of the major accomplishments that have been made by the applicant with respect to energy conservation and efficiency;	Alternative data in Section 5, 7 and Appendices D and G	Yes	
7849.0290(E)	Conservation Programs: Plans	a description of the applicant's future plans through the forecast years with respect to energy conservation and efficiency;	Alternative data in Section 5, 7 and Appendices D and G	Yes	
7849.0290(F)	Conservation Programs: Quantification	a quantification of the manner by which these programs affect or help determine the forecast provided in response to part 7849.0270, subpart 2, a list of their total costs by program, and a discussion of their expected effects in reducing the need for new generation and transmission facilities.	Alternative data in Section 5, 7 and Appendices D and G	Yes	
7849.0300	Consequences of Delay	The applicant shall present a discussion of anticipated consequences to its system, neighboring systems, and the power pool should the proposed facility be delayed one, two, and three years, or postponed indefinitely. This information must be provided for the following three levels of demand: the expected demand provided in response to part 7849.0270, subpart 2, and the upper and lower confidence levels provided in response to part 7849.0270, subpart 3, item E.	Alternative data in Section 6 and 7	Yes	

Minnesota Rule	Short Description	Rule Text	Location	Complete?	Comments and Questions
7849.0310	Environmental Info Required	Each applicant shall provide environmental data for the proposed facility and for each alternative considered in detail in response to part 7849.0250, item C or 7849.0260, item C. Information relating to construction and operation of each of these alternatives shall be provided as indicated in parts 7849.0320 to 7849.0340, to the extent that such information is reasonably available to the applicant and applicable to the particular alternative. Where appropriate, the applicant shall submit data for a range of possible facility designs. Major assumptions should be stated, and references should be cited where appropriate.	Section 10	Yes	
7849.0320	Generator Alternative Info	The applicant shall provide the following information for each alternative that would involve construction of an LEGF:			
7849.0320(A)	Land Required	the estimated range of land requirements for the facility with a discussion of assumptions on land requirements for water storage, cooling systems, and solid waste storage;	N/A	N/A	
7849.0320(B)	Traffic	the estimated amount of vehicular, rail, and barge traffic generated by construction and operation of the facility;	N/A	N/A	
7849.0320(C)	Fossil Fuel Information	for fossil-fueled facilities:	N/A	N/A	
7849.0320(C)(1)	Fuel Sources	the expected regional sources of fuel for the facility;	N/A	N/A	
7849.0320(C)(2)	Fuel Requirement	the typical fuel requirement (in tons per hour, gallons per hour, or thousands of cubic feet per hour) during operation at rated capacity and the expected annual fuel requirement at the expected capacity factor;	N/A	N/A	
7849.0320(C)(3)	Heat Rate	the expected rate of heat input for the facility in Btu per hour during operation at rated capacity;	N/A	N/A	
7849.0320(C)(4)	Heat Value	the typical range of the heat value of the fuel (in Btu per pound, Btu per gallon, or Btu per 1,000 cubic feet) and the typical average heat value of the fuel;	N/A	N/A	
7849.0320(C)(5)	Fuel Content	the typical ranges of sulfur, ash, and moisture content of the fuel;	N/A	N/A	
7849.0320(D)	Fossil Fuel Information	for fossil fueled facilities:	N/A	N/A	
7849.0320(D)(1)	Trace Elements	the estimated range of trace element emissions and the maximum emissions of sulfur dioxide, nitrogen oxides, and particulates in pounds per hour during operation at rated capacity; and	N/A	N/A	
7849.0320(D)(2)	Emission Concentrations	the estimated range of maximum contributions to 24-hour average ground level concentrations at specified distances from the stack of sulfur dioxide, nitrogen oxides, and particulates in micrograms per cubic meter during operation at rated capacity and assuming generalized worst-case meteorological conditions;	N/A	N/A	
7849.0320(E)	Water Use	water use by the facility for alternate cooling systems, including: (1) the estimated maximum use, including the groundwater pumping rate in gallons per minute and surface water appropriation in cubic feet per second; (2) the estimated groundwater appropriation in million gallons per year; and (3) the annual consumption in acre-feet;	N/A	N/A	

Minnesota Rule	Short Description	Rule Text	Location	Complete?	Comments and Questions
7849.0320(E)	Water Use	water use by the facility for alternate cooling systems, including:			
7849.0320(E)(1)	Water Use	the estimated maximum use, including the groundwater pumping rate in gallons per minute and surface water appropriation in cubic feet per second;	N/A	N/A	
7849.0320(E)(2)	Water Use	(2) the estimated groundwater appropriation in million gallons per year;	N/A	N/A	
7849.0320(E)(3)	Water Use	the annual consumption in acre-feet;	N/A	N/A	
7849.0320(F)	Discharges	the potential sources and types of discharges to water attributable to operation of the facility;	N/A	N/A	
7849.0320(G)	Radioactive Releases	radioactive releases, including:	N/A	N/A	
7849.0320(G)(1)	Nuclear Facilities	for nuclear facilities, the typical types and amounts of radionuclides released by the facility in curies per year for alternate facility designs and levels of waste treatment;	N/A	N/A	
7849.0320(G)(2)	Fossil Fuel Facilities	for fossil-fueled facilities, the estimated range of radioactivity released by the facility in curies per year;	N/A	N/A	
7849.0320(H)	Solid Wastes	the potential types and quantities of solid wastes produced by the facility in tons per year at the expected capacity factor;	N/A	N/A	
7849.0320(I)	Noise	the potential sources and types of audible noise attributable to operation of the facility;	N/A	N/A	
7849.0320(J)	Work Force	the estimated work force required for construction and operation of the facility;	N/A	N/A	
7849.0320(K)	Transmission	the minimum number and size of transmission facilities required to provide a reliable outlet for the generating facility.	N/A	N/A	
7849.0330	Transmission Facilities	The applicant shall provide data for each alternative that would involve construction of an LHVTL. The following information must be included:			
7849.0330(A)	Overhead Transmission	for overhead transmission facilities:			
7849.0330(A)(1)	Overhead Transmission: Structure/Conductor Diagram	schematic diagrams that show the dimensions of the support structures and conductor configurations for each type of support structure that may be used;	2.2.2 and Appendix C	Yes	
7849.0330(A)(2)	Overhead Transmission: Electric Fields	a discussion of the strength and distribution of the electric field attributable to the transmission facility, including the contribution of air ions if appropriate;	8.6	Yes	
7849.0330(A)(3)	Overhead Transmission: Ozone and Nitrogen Oxide	a discussion of ozone and nitrogen oxide emissions attributable to the transmission facility;	8.2	Yes	
7849.0330(A)(4)	Overhead Transmission: Radio and TV Interference	a discussion of radio and television interference attributable to the transmission facility;	8.4	Yes	
7849.0330(A)(5)	Overhead Transmission: Audible Noise	a discussion of the characteristics and estimated maximum and typical levels of audible noise attributable to the transmission facilities;	8.3	Yes	
7849.0330(B)	Underground Transmission	for underground transmission facilities:			
7849.0330(B)(1)	Cable Types	the types and dimensions of the cable systems and associated facilities that would be used;	N/A	N/A	
7849.0330(B)(2)	Cable Materials	the types and quantities of materials required for the cable system, including materials required for insulation and cooling of the cable;	N/A	N/A	
7849.0330(B)(3)	Cable Heat	the amount of heat released by the cable system in kilowatts per foot of cable length;	N/A	N/A	
7849.0330(C)	Right-of-Way	the estimated width of the right-of-way required for the transmission facility;	1.2.1 and 9.2	Yes	
7849.0330(D)	Construction Practices	a description of construction practices for the transmission facility;	9.3 and 9.4	Partial	1. What is the Applicants plan if the South Dakota or Iowa sections of the project are completed before or after the Minnesota segments? If the Minnesota segment is completed first, is it energized, or will all segments have to be built for the project to be energized? Are the Applicants communicating with other states' utilities to coordinate this?
7849.0330(E)	O & M Practices	a description of operation and maintenance practices for the transmission facility;	9.5 and 9.6	Yes	
7849.0330(F)	Work Force	the estimated work force required for construction and for operation and maintenance of the transmission facility;	2.6	Yes	

Minnesota Rule	Short Description	Rule Text	Location	Complete?	Comments and Questions
7849.0330(G)	Description of Region	a narrative description of the major features of the region between the endpoints of the transmission facility. The region shall encompass the likely area for routes between the endpoints. The description should emphasize the area within three miles of the endpoints. The following information shall be described where applicable:			
7849.0330(G)(1)	Hydrologic Features	hydrologic features including lakes, rivers, streams, and wetlands;	Alternative data in section 10	Yes	
7849.0330(G)(2)	Vegetation & Wildlife	natural vegetation and associated wildlife;	Alternative data in section 10	Yes	
7849.0330(G)(3)	Physiographic Regions	physiographic regions;	Alternative data in section 10	Yes	
7849.0330(G)(4)	Land Use	land-use types, including human settlement, recreation, agricultural production, forestry production, and mineral extraction.	Alternative data in section 10	Yes	
7849.0340	No-facility Alternative	For each of the three levels of demand specified in part 7849.0300, the applicant shall provide the following information for the alternative of no facility:			
7849.0340(A)	Existing System Impact	a description of the expected operation of existing and committed generating and transmission facilities;	Alternative data in 7.7	Yes	
7849.0340(B)	Resource Requirements & Emissions	a description of the changes in resource requirements and wastes produced by facilities discussed in response to item A, including: (1) the amount of land required; (2) induced traffic; (3) fuel requirements; (4) airborne emissions; (5) water appropriation and consumption; (6) discharges to water; (7) reject heat; (8) radioactive releases; (9) solid waste production; (10) audible noise; and (11) labor requirements;	Alternative data in 7.7	Yes	
7849.0340(C)	Reducing Impacts	a description of equipment and measures that may be used to reduce the environmental impact of the alternative of no facility.	Alternative data in 7.7	Yes	



CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Comments

Docket No. E002, ET2, ET6675/CN-25-117

Dated this **23rd** day of **February 2026**

/s/Sharon Ferguson

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18	Eric	Fehlhaber	efehlhaber@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	25-117 Official
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46	Max	Meyer	mmeyer@misoenergy.org	Midcontinent Independent System Operator, Inc.		2985 Ames Crossing Road Eagan MN, 55121 United States	Electronic Service		No	25-117 Official
47	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	25-117 Official
48	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	25-117 Official
49	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	25-117 Official
50	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	25-117 Official

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53	Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	25-117 Official
54	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		No	25-117 Official
55	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	25-117 Official
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60	Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	25-117 Official
61	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	25-117 Official
62	Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	25-117 Official
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65	Cary	Stephenson	cstephenson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	25-117 Official
66	Dusky	Terry	dterry@itctransco.com	ITC Midwest LLC			Electronic Service		No	25-117 Official
67	Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States	Electronic Service		No	25-117 Official
68	Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP		80 S 8th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	25-117 Official
69	Leonard	Wabasha	leonard.wabasha@shakopeedakota.org	Shakopee Mdwakanton Sioux Community		2300 Tiwahe Circle Shakopee MN, 55379 United States	Electronic Service		No	25-117 Official
70	Haley	Waller Pitts	hwallerpitts@fredlaw.com	Fredrikson & Byron, P.A.		60 S Sixth St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	25-117 Official
71	Leanna	Whipple	lwhipple@itctransco.com	ITC Midwest LLC		100 East Grand Avenue, Suite 230 Des Moines IA, 50309 United States	Electronic Service		No	25-117 Official
72	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	25-117 Official
73	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	25-117 Official
74	Patrick	Zomer	pzomer@cozen.com	Cozen O'Connor		150 S. 5th Street, #1200 Minneapolis MN, 55402 United States	Electronic Service		No	25-117 Official

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1	David	Bell	david.bell@state.mn.us		Department of Health	POB 64975 St. Paul MN, 55164 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
2	Water Programs	Coordinator	waterprograms.bwsr@state.mn.us		Minnesota Board of Water and Soil Resources	520 Lafayette Road N St. Paul MN, 55155 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
3	Randall	Doneen	randall.doneen@state.mn.us		Department of Natural Resources	500 Lafayette Rd, PO Box 25 Saint Paul MN, 55155 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
4	Kate	Fairman	kate.fairman@state.mn.us		Department of Natural Resources	Box 32 500 Lafayette Rd St. Paul MN, 55155-4032 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
5	Annie	Felix Gerth	annie.felix-gerth@state.mn.us			Board of Water & Soil Resources 520 Lafayette Rd Saint Paul MN, 55155 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
6	Kari	Howe	kari.howe@state.mn.us		DEED	332 Minnesota St, #E200 1ST National Bank Bldg St. Paul MN, 55101 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
7	Dean	Hunter	dean.hunter@state.mn.us		Minnesota Department of Labor & Industry	443 Lafayette Rd N St. Paul MN, 55155-4341 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
8	Raymond	Kirsch	raymond.kirsch@state.mn.us		Public Utilities Commission	121 7th Place E, Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
9	Chad	Konickson	chad.konickson@usace.army.mil	U.S. Army Corps of Engineers		332 Minnesota St. Suite E1500 Saint Paul MN, 55101 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
10	Stacy	Kotch Egstad	stacy.kotch@state.mn.us		MINNESOTA DEPARTMENT OF TRANSPORTATION	395 John Ireland Blvd. St. Paul MN, 55155 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
11	Dawn S	Marsh	dawn_marsh@fws.gov	U.S. Fish & Wildlife Service		Minnesota-Wisconsin Field Offices 4101 American Blvd E Bloomington MN, 55425 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
12	Stephan	Roos	stephan.roos@state.mn.us		Minnesota Department of Agriculture	625 Robert St N Saint Paul MN, 55155-2538 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS

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14	Jen	Tyler	tyler.jennifer@epa.gov	US Environmental Protection Agency		Environmental Planning & Evaluation Unit 77 W Jackson Blvd. Mailstop B-19J Chicago IL, 60604-3590 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
15	Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources		500 Lafayette Road Box 25 St. Paul MN, 55155-4040 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
16	Alan	Whipple	sa.property@state.mn.us		Minnesota Department Of Revenue	Property Tax Division 600 N. Robert Street St. Paul MN, 55146-3340 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
17	Jonathan	Wolfgram	jonathan.wolfgram@state.mn.us		Office of Pipeline Safety	445 Minnesota St Ste 147 Woodbury MN, 55125 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS