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July 6, 2026

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

Re: 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
DOCKET No. E002, ET2, ET6675/CN-25-117
CAH Docket No 28-2500-41617

Dear Ms. Bergman:

Great River Energy, Northern States Power Company, doing business as Xcel Energy, and ITC Midwest LLC (collectively, Applicants) respectfully submit the enclosed Comments on Commission Staff's Briefing Papers to the Minnesota Public Utilities Commission, Decision Option 2 in the above-captioned docket.

This documents have been e-filed today through www.edockets.state.mn.us. A copy of this filing is also being served upon the persons on the attached Service List. If you have any questions or need additional information, please contact Dan Leshner at dlesher@greenergy.com, Jody Londo at jody.l.londo@xcelenergy.com, or Margaret Kristian at mkrastian@itctransco.com.

Sincerely,

FREDRIKSON & BYRON, P.A.

/s/ Lisa M. Agrimonti

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**STATE OF MINNESOTA
COURT OF ADMINISTRATIVE HEARINGS
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PUBLIC UTILITIES COMMISSION**

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Commissioner
Commissioner
Commissioner

**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**

Docket No. E002, ET2, ET6675/CN-25-117
CAH Docket No. 28-2500-41617

**APPLICANTS' COMMENTS ON
COMMISSION STAFF'S BRIEFING
PAPERS,
DECISION OPTION TWO**

Great River Energy, Northern States Power Company, doing business as Xcel Energy, and ITC Midwest LLC (collectively, Applicants) are in receipt of the Minnesota Public Utilities Commission (Commission) Staff's Briefing Papers filed on July 1, 2026. The Applicants are aware that there is currently no open comment period but respectfully request consideration of the Applicants' comments below pursuant to Minn. R. 7829.0420.

The Applicants support Commission Staff's recommendations, with one requested modification to Decision Option 2, shown below. Decision Option 2 reads:

2. Grant the Applicants' request for clarification and affirm the Scope with the following clarification language:

The Environmental Report may address partial-build or delayed-build alternatives for the Pleasant Valley-to-North Rochester 765-kV segment at a screening level. Inclusion of an alternative in the scoping decision does not mean that detailed analysis is required for every alternative suggested. The Environmental Report ~~may~~ must screen out alternatives that would require evaluation of different endpoints inconsistent with Minn. Stat. § 216B.243, subd. 3(6), are otherwise outside the Commission's authority to require, are infeasible, are unsupported by sufficient information, or would

not meet the stated need for the project. If Commission staff determines that an alternative should not be carried forward for detailed analysis, the Environmental Report shall briefly explain the basis for that determination.

As revised, the proposed clarification is consistent with the statutory mandate of Minn. Stat. § 216B.243, subd. 3(6), which expressly limits the Commission's evaluation of alternative endpoints to only two circumstances, neither of which is present here.¹

Applicants therefore request that the Commission approve Staff's clarification with the one-word change to provide that Staff must screen out an alternative that does not comply with Minnesota law.

Respectfully submitted,

Dated: July 6, 2026

/s/ Lisa M. Agrimonti

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¹ Further discussion of the application of Minn. Stat. § 216B.243, subd. 3(6) was included in the Applicants' Request for Clarification and/or Objection to June 9, 2026, Order and Scoping Decision (June 16, 2026) (eDocket No. [20266-232986-01](#)); and the Applicants' Response to Scoping Comments (May 29, 2026) (eDocket No. [20265-232324-01](#)).

**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**

DOCKET NO. E002, ET2, ET6675/CN-25-117

CERTIFICATE OF SERVICE

Breann L. Jurek certifies that on the 6th of July, 2026, she e-filed a true and correct copy of the **Applicants' Comments on Commission Staff's Briefing Papers Decision Option Two**, on behalf of Great River Energy, Northern States Power Company, doing business as Xcel Energy, and ITC Midwest LLC via eDockets (www.edockets.state.mn.us).

Said documents were also served as designated on the Official Service List on file with the Minnesota Public Utilities Commission and as attached hereto.

Executed on July 6, 2026

Signed: /s/ Breann L. Jurek

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