

In the Matter of Application of Minnesota Power, Great River Energy, and Otter Tail Power Company for a Certificate of Need for the Maple River – Cuyuna 345kV Transmission Line Project

PUC Docket Numbers: E015, ET2, E017/CN-25-109

Supplemental Comments

LIUNA Minnesota and North Dakota (“LIUNA”) appreciates the opportunity to comment on the certificate of need application filed by Minnesota Power, Great River Energy, and Otter Tail Power for construction of an 160- to 180-mile-long 345 kV transmission line between the Cuyuna and Maple River substations. We believe that the application satisfies the requirements of applicable statutes and rules governing issuance of a Certificate of Need for the development of high-voltage transmission lines, and we urge the Minnesota Public Utilities Commission (“Commission”) to accept the applications as complete and allow the applicants to proceed.

LIUNA represents more than 14,000 skilled construction laborers, including customers of Minnesota Power, Great River Energy, Otter Tail Power and other investor-owned, cooperative and municipal utilities that will realize system benefits from construction and operation of the proposed line based on analysis completed by the Midcontinent Independent System Operator (“MISO”). Our members and their families count on affordable and reliable electricity, not only to power their homes, but also to serve construction contractors for whom they work, and energy-intensive industries that provide construction work opportunities.

Many LIUNA members also work in the energy industry, and our union has become heavily involved in policy and regulatory processes to support an orderly energy transition that reduces greenhouse gas emissions while preserving reliability and maximizing the employment and other socioeconomic benefits of energy investment. In our view, a critical shortage of transmission capacity currently represents the greatest obstacle to accomplishing these goals.

We appreciate the careful work done by project proposers to prepare a Certificate of Need application that meets all of the requirements set out in statute and rule. We recommend that the Commission accept the application as complete and order an informal review process as recommended by the Department of Commerce and MISO.

We do not believe any party has identified contested issues of fact requiring contested case proceedings through the Court of Administrative Hearings. We respectfully disagree with arguments made by Donna and Curtis Andersen, and by Carol Overland, alleging that contested issues of fact exist. The Andersens cite “whether the line is needed” as the principal contested fact. But a determination of need is a judgment the Commission is charged with making based on facts in the record, not a fact in itself, and following this logic would send every petition to a contested case proceeding because the Commission had not yet decided on the merits. Ms. Overland, likewise, does not identify contested facts but instead expresses skepticism regarding facts in the petition which she does not refute in her letter.

We thank the Commission for your consideration and look forward to participating in this docket.

Dated: March 10, 2026

Respectfully Submitted,
LIUNA Minnesota & North Dakota

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