

Appendix A

Certificate of Need Completeness Checklist

[This page intentionally left blank.]

**Big Stone South – Alexandria – Big Oaks 345 kV Transmission Project
Certificate of Need Application
Completeness Checklist**

AUTHORITY	REQUIRED INFORMATION	LOCATION IN APPLICATION
Minn. R. 7829.2500, subp. 2	Brief summary of filing on separate page sufficient to apprise potentially interested parties of its nature and general content	Filing Summary
Minn. R. 7849.0200, subp. 2	Title Page and Table of Contents	Title Page and Table of Contents
Minn. R. 7849.0200, subp. 4	Cover Letter	Cover Letter
Minn. R. 7849.0220, subp. 3	Joint Ownership and Multiparty use	§§ 1.1, 1.3
Minn. R. 7849.0240	Need summary and additional considerations	–
subp. 1	Summary of the major factors that justify the need for the proposed facility	§§ 1.1, 3.3, 4.1, 4.2, and 4.3
subp. 2	Relationship of the proposed facility to the following socioeconomic considerations:	–
A.	Socially beneficial uses of the output of the facility	§ 4.9
B.	Promotional activities that may have given rise to the demand for the facility	§ 4.7
C.	Effects of the facility in inducing future development	§ 4.8
Minn. R. 7849.0260	Proposed LHVTL and Alternatives	–
A.	A description of the type and general location of the proposed line, including:	–
(1)	Design voltage	§ 2.1
(2)	Number, sizes and types of conductors	§ 2.1

AUTHORITY	REQUIRED INFORMATION	LOCATION IN APPLICATION
(3)	Expected losses under projected maximum loading and under projected average loading in the length of the line and at terminals or substations	EXEMPT from providing line-specific loss information, provided alternative data is supplied.
	ALTERNATIVE DATA – Estimated overall system losses.	§ 4.4
(4)	Approximate length of the proposed line	§ 2.2
(5)	Approximate locations of DC terminals or AC substations on a map	Maps 1-1 and 2-1
(6)	List of likely affected counties	§ 8.1
B.	Discussion of the available alternatives including:	–
(1)	New generation	§ 5.2.7
(2)	Upgrading existing transmission lines	§ 5.2.2
(3)	Transmission lines with different voltages or conductor arrays	§ 5.1.1
(4)	Transmission lines with different terminals or substations	§§ 4.2.6, 5.2.1, Appendix E-1
(5)	Double circuiting of existing transmission lines	§ 5.2.3
(6)	If facility for DC (AC) transmission, an AC (DC) transmission line	§ 5.2.4
(7)	If proposed facility is for overhead (underground) transmission, an underground (overhead) transmission line	§ 5.2.5
(8)	Any reasonable combination of alternatives (1) – (7)	Chapter 5, Appendix E-1
C.	For the facility and for each alternative in B, a discussion of:	–
(1)	Total cost in current dollars	§§ 1.5, 2.3.1

AUTHORITY	REQUIRED INFORMATION	LOCATION IN APPLICATION
(2)	Service life	§ 7.4
(3)	Estimated average annual availability	§ 7.5
(4)	Estimated annual O&M costs in current dollars	§ 7.4
(5)	Estimate of its effect on rates system wide and in Minnesota	§ 2.3.3, Appendix H
(6)	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.	EXEMPT from providing line-specific loss information, provided alternative data is supplied.
	ALTERNATIVE DATA – Estimated overall system losses.	§ 4.4
(7)	Major assumptions made in subitems (1) – (6)	Chapters 2, 5, and 7
D.	A map (of appropriate scale) showing the applicant's system or load center to be served by the proposed LHVTL.	Maps 1-1 and 2-1
E.	Such other information about the proposed facility and each alternative as may be relevant to determination of need.	Chapters 4 and 5
Minn. R. 7849.0270	Content of Forecast	–
Minn. R. 7849.0270, subp. 1	Peak demand and annual consumption data within the applicant's service area and system.	EXEMPT from providing specific forecasting and capacity information for the Applicants' systems, provided alternative data is supplied.
	ALTERNATIVE DATA – Forecast information used in analyzing the need for the Project.	§ 4.6, Appendix E-3
Minn. R. 7849.0270, subp. 2 (A)-(D), and (F)	Subps. 2 (A)-(D), and (F) – Minnesota forecast data; forecast demand data by customer class, peak period, and month; estimated system annual revenue per kilowatt hour; estimated average weekday system load factor by month; and estimated average weekday load factor by month.	EXEMPT from providing specific forecasting and capacity information for the Applicant's systems, provided alternative data is supplied. <i>See</i> Minn. R. 7849.0270, subp. 1

AUTHORITY	REQUIRED INFORMATION	LOCATION IN APPLICATION
Minn. R. 7849.0270, subp. 2 (E)	Estimated annual revenue requirement per kWh in current dollars	EXEMPT from providing annual revenue requirements for the project, provided alternative data is supplied.
	ALTERNATIVE DATA – Explanation of how the costs for LRTP projects are shared within the MISO footprint.	§ 2.3.2 and Appendix E-1
Minn. R. 7849.0270, subp. 3	Detail of the forecast methodology used in subp. 2.	EXEMPT from providing specific forecasting and capacity information for the Applicant's systems, provided alternative data is supplied. <i>See</i> Minn. R. 7849.0270, subp. 1
Minn. R. 7849.0270, subp. 4	Discussion of the database used in current forecasting.	EXEMPT from providing specific forecasting and capacity information for the Applicant's systems, provided alternative data is supplied. <i>See</i> Minn. R. 7849.0270, subp. 1
Minn. R. 7849.0270, subp. 5	Discussion of forecasting assumptions.	EXEMPT from providing specific forecasting and capacity information for the Applicant's systems, provided alternative data is supplied. <i>See</i> Minn. R. 7849.0270, subp. 1
Minn. R. 7849.0270, subp. 6	Coordination of Forecasts	EXEMPT from providing specific forecasting and capacity information for the Applicant's systems, provided alternative data is supplied. <i>See</i> Minn. R. 7849.0270, subp. 1
Minn. R. 7849.0280	System Capacity	—
Minn. R. 7849.0280, subp. A.	Power Planning Programs	Chapter 4 and Appendix E-1
Minn. R. 7849.0280, subps. (B)-(I)	System Capacity – description of the ability of the existing system to meet the demand forecast required by Minn. Rule 7849.0270.	EXEMPT from providing description of the ability of the existing system to meet the

AUTHORITY	REQUIRED INFORMATION	LOCATION IN APPLICATION
		demand forecast.
Minn. R. 7849.0290	Conservation programs and their effect on the forecast information required by Minn. Rule 7849.0270.	EXEMPT from discussing Applicants' conservation programs and their effect on the forecast, provided alternative data is supplied.
	ALTERNATIVE DATA – Information related either to Applicants' conservation programs or to the conservation programs that are available to their members serving load in Minnesota; information regarding how conservation and energy efficiency was considered by MISO in its evaluation of the Project.	§ 5.2.7.5 and Appendix F-1
Minn. R. 7849.0300	Consequence of Delay	EXEMPT from providing analysis using three levels of demand (three confidence levels), provided substitute information is supplied.
	ALTERNATIVE DATA – Discussion of the consequences of delay.	§ 5.3
Minn. R. 7849.0310	Required Environmental Information	Chapter 8
Minn. R. 7849.0330	Transmission Facilities	—
	Data for each alternative that would require LHVTL construction including:	—
A.	For overhead transmission lines	—
(1)	Schematics showing dimensions of support structures	§ 2.1.1 and Appendix G
(2)	Discussion of electric fields	§ 6.6
(3)	Discussion of ozone and nitrogen oxide emissions	§ 6.2
(4)	Discussion of radio and television interference	§ 6.4

AUTHORITY	REQUIRED INFORMATION	LOCATION IN APPLICATION
(5)	Discussion of audible noise	§ 6.3
B.	For underground transmission facilities:	N/A
(1)	Types and dimensions of cable systems	N/A
(2)	Types and qualities of cable system materials	N/A
(3)	Heat released in kW per foot of cable	N/A
C.	Estimated right-of-way required for the facility	§ 2.1.1
D.	Description of construction practices	§§ 7.2, 7.3
E.	Description of O&M practices	§ 7.4
F.	Estimated workforce required for construction and O&M	§§ 7.2, 7.4
G.	Description of region between endpoints in likely area for routes emphasizing a three-mile radius of endpoints including:	–
(1)	Hydrological features	§ 8.1.6
(2)	Vegetation and wildlife	§§ 8.1.7, 8.1.8
(3)	Physiographic regions	§ 8.1.2
(4)	Land use types	§§ 8.1.3.1, 8.1.3.2
Minn. R. 7849.0340	No-Facility Alternative	EXEMPT from providing analysis using three levels of demand (three confidence levels), provided substitute information is supplied.

AUTHORITY	REQUIRED INFORMATION	LOCATION IN APPLICATION
	ALTERNATIVE DATA – Discussion of the consequences of delay.	§ 5.3

Appendix B
Applicants' Exemption Request



414 Nicollet Mall
Minneapolis, MN 55401

March 10, 2023

—Via Electronic Filing—

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
350 Metro Square Building
121 Seventh Place East
St. Paul, MN 55101

Re: IN THE MATTER OF THE APPLICATION FOR A CERTIFICATE OF NEED FOR THE
BIG STONE SOUTH – ALEXANDRIA – BIG OAKS TRANSMISSION PROJECT
DOCKET NO. E002, E017, ET2, E015, ET10/CN-22-538

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, along with Great River Energy, Minnesota Power, Otter Tail Power Company, and Western Minnesota Municipal Power Agency (collectively, the Applicants) submit this Exemption Request to the Minnesota Public Utilities Commission pursuant to Minn. Rule 7849.0200, subp. 6. Please contact me at bria.e.shea@xcelenergy.com or 612-330-6064 if you have any questions regarding this filing.

Sincerely,

/s/ Bria E. Shea

BRIA E. SHEA
REGIONAL VICE PRESIDENT, REGULATORY POLICY

c: Service Lists

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

Katie J. Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF THE APPLICATION
FOR A CERTIFICATE OF NEED FOR THE
BIG STONE SOUTH – ALEXANDRIA – BIG
OAKS TRANSMISSION PROJECT

MPUC Docket No. E002, E017, ET2,
E015, ET10/CN-22-538

**REQUEST FOR EXEMPTION FROM
CERTAIN CERTIFICATE OF NEED
APPLICATION CONTENT
REQUIREMENTS**

I. INTRODUCTION

Northern States Power Company, doing business as Xcel Energy (Xcel Energy), along with Great River Energy, Minnesota Power, Otter Tail Power Company (Otter Tail), and Western Minnesota Municipal Power Agency (Western Minnesota) (collectively, Applicants) respectfully submit this request for exemptions from certain content requirements for the Certificate of Need application for the Big Stone South – Alexandria – Big Oaks 345 kilovolt (kV) Transmission Line Project (the Project) pursuant to Minn. Rule 7849.0200, subp. 6.¹

The Project consists of a new 345 kV transmission line between Big Stone City, South Dakota, and Sherburne County, Minnesota which will be comprised of two segments.

- The western segment will run from the existing Big Stone South Substation near Big Stone City, South Dakota to the existing Alexandria Substation near Alexandria, Minnesota (Western Segment); and

¹ The Cassie's Crossing Substation has been renamed the Big Oaks Substation.

- The eastern segment will continue on from the existing Alexandria Substation to a new Big Oaks Substation in Sherburne County, Minnesota (Eastern Segment).²

The proposed 345 kV transmission lines will traverse Grant County in South Dakota and Big Stone, Lac Qui Parle, Swift, Kandiyohi, Stevens, Pope, Douglas, Todd, Stearns, Wright, and Sherburne counties in Minnesota.

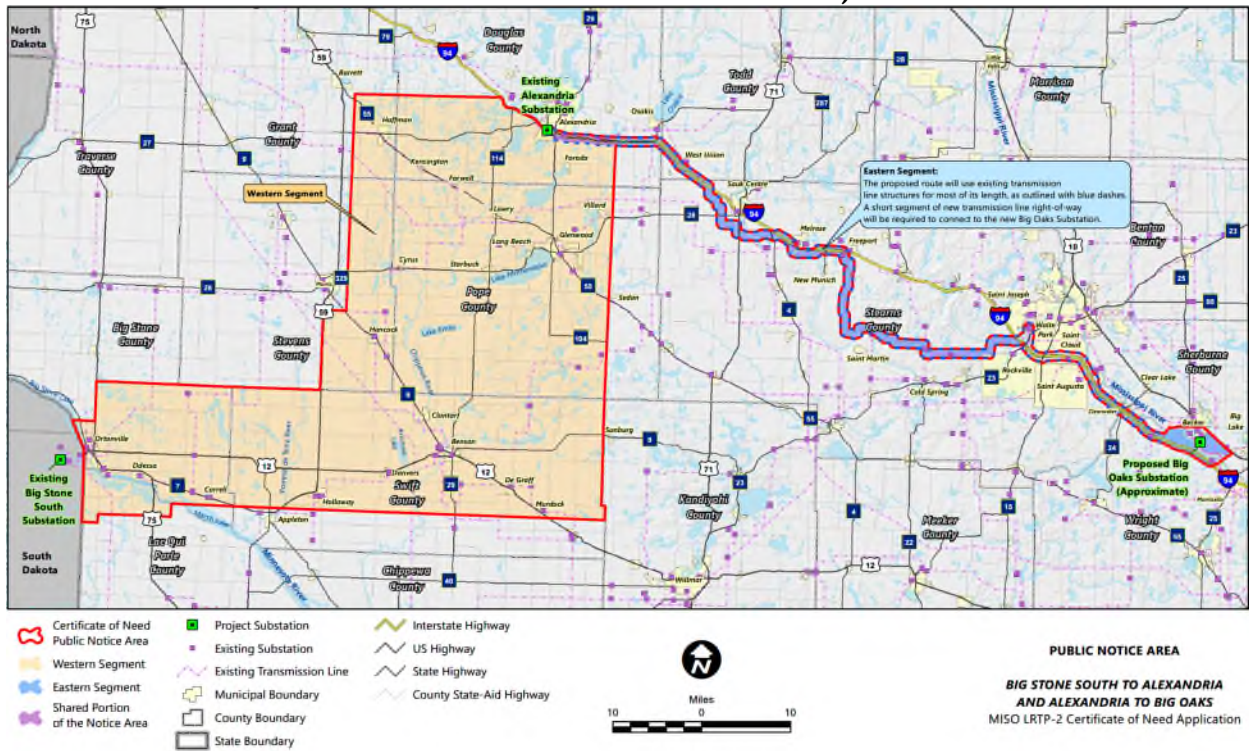
The Applicants intend to file a single Certificate of Need application, pursuant to Minn. Stat. § 216B.243, for the Minnesota portion of both segments of the Project in the third quarter of 2023. The Applicants believe that certain Certificate of Need application content requirements of Minn. Rules Chapter 7849 should be modified to better address the nature of the Applicants, the proposal, and the need for this Project. The Commission has accepted similar adjustments for other transmission line projects in the recent past. The Applicants therefore respectfully request that the Commission grant exemptions from certain requirements as provided under Minn. Rule 7849.0200, subp. 6. In lieu of some content requirements, the Applicants propose to submit alternative information that will better inform the Commission’s decision regarding the need for the Project.

II. BACKGROUND

The Project is a Large Energy Facility as defined by Minn. Stat. § 216B.2421, subd. 2(2) because the Project is a 345 kV transmission line that will be longer than 1,500 feet. **Figure 1** below shows the endpoints for the Project as well as other existing transmission facilities of note in the area.

² The Western Segment and the Eastern Segment are herein referred to collectively as the Project.

**Figure 1: Big Stone South – Alexandria – Big Oaks
345 kV Transmission Line Project**



The Project was studied, reviewed, and approved as part of the Long Range Transmission Planning (LRTP) Tranche 1 Portfolio by the Midcontinent Independent System Operator, Inc.’s (MISO)³ Board of Directors in July 2022 as part of its 2021 Transmission Expansion Plan (MTEP21) report.⁴ The Applicants filed a notice of intent to construct, own, and maintain the Project with the Commission on October 12, 2022.

The LRTP Tranche 1 Portfolio will provide significant benefits to the Midwest subregion of the MISO footprint by facilitating more reliable, safe, and affordable energy delivery. The Project, designated as LRTP#2 in MTEP21, is a key part of the LRTP Tranche 1 Portfolio. More specifically, the existing 230 kV transmission system in eastern North Dakota and South Dakota plays a key role in transporting and delivering energy into Minnesota. The 230 kV system is at its capacity leading to a number of reliability concerns that could affect customers’ service. The Project is

³ MISO is a member-based non-profit regional transmission organization (RTO) that is responsible for the planning and operation of transmission grid and wholesale energy market across 15 states and the Canadian province of Manitoba. MISO’s members include 48 transmission owners with more than 65,800 miles of transmission lines and \$34.5 billion in transmission assets that are under MISO’s functional control.

⁴ A copy of the MTEP21 report is available online at: <https://cdn.misoenergy.org/MTEP21%20Addendum-LRTP%20Tranche%201%20Report%20with%20Executive%20Summary625790.pdf>.

needed to provide additional transmission capacity, to mitigate current capacity issues, and to improve electric system reliability throughout the region as more renewable energy resources are added to the electric system in and around the region.

III. LEGAL STANDARD AND SUMMARY EXEMPTION

The content requirements for a Certificate of Need application for a large high-voltage transmission line (LHVTL) are specified in Minn. Rule 7849.0220, subp. 2, Minn. Rule 7849.0240, and Minn. Rules 7849.0260 to 7849.0340. The Commission has authority to grant exemptions from the requirements of Minn. Rules Chapter 7849 pursuant to Minn. Rule 7849.0200, subp. 6, which provides:

Subp. 6 Exemptions. Before submitting an application, a person is exempted from any data requirement of parts 7849.0010 to 7849.0400 if the person (1) requests an exemption from specific rules, in writing to the commission, and (2) shows that the data requirement is unnecessary to determine the need for the proposed facilities or may be satisfied by submitting another document. A request for exemption must be filed at least 45 days before submitting an application. The commission shall respond in writing to a request for exemption within 30 days of receipt and include the reasons for the decision. The commission shall file a statement of exemptions granted and reasons for granting them before beginning the hearing.

Based on the standard set forth in this rule, the Commission may grant exemptions when the data requirements: (1) are unnecessary to determine need in a specific case; or (2) can be satisfied by submitting documents other than those required by the rules.⁵

The Applicants specifically request that the Commission grant exemptions from the following rules as they are either unnecessary to determine the need for the Project or can be satisfied by submitting alternative data:

⁵ *In the Matter of The Application for a Certificate of Need for the Appleton – Canby 115 kV Line*, Docket No. E-017/CN-06-0677, ORDER GRANTING EXEMPTIONS AND APPROVING NOTICE PLAN (Aug. 1, 2006).

Minn. Rule	Scope of Exemption
Minn. Rule 7849.0260, subps. A(3) and C(6) (Losses)	Request exemption from providing line-specific loss information. The Applicants propose to provide substitute data in the form of overall system losses.
Minn. Rule 7849.0270, subps. (1) through (6) (Forecasting)	Request exemption from providing specific forecasting and capacity information. The Applicants propose to provide substitute forecast information used in analyzing the need for the Project.
Minn. Rule 7849.0270, subp. 2(E) (Annual Revenue Requirements)	Request exemption from providing annual revenue requirements for the Project. The Applicants propose to provide general information regarding how the costs for LRTP projects are shared within the MISO footprint.
Minn. Rule 7849.0280, subps. (B) through (I) (System Capacity)	Request full exemption from providing a discussion of the ability of the existing system to meet the forecasted demand for electrical energy identified in response to Minn. Rule 7849.0270.

Minn. Rule 7849.0290 (Conservation)	Request exemption from discussing conservation programs and their effect on the forecast information required by Minn. Rule 7849.0270. The Applicants propose to provide substitute information related either to their conservation programs or to the conservation programs that are available to their members ⁶ serving load in Minnesota. The Applicants will also provide information regarding how conservation and energy efficiency was considered by MISO in its evaluation of the Project.
Minn. Rule 7849.0300 (Consequences of Delay); Minn. Rule 7849.0340 (No Facility Alternative)	Request to be exempt from providing analysis using three confidence levels. The Applicants propose to provide substitute data regarding potential impacts caused by delay or by not building the Project.

Attachment A to this filing summarizes all of the Certificate of Need content requirements and identifies the requirements for which an exemption is being requested and whether the Applicants intend to provide substitute data. Each of these exemption requests is discussed in more detail below. This request is being made at least 45 days prior to submitting an application for a Certificate of Need as required by Minn. Rule 7849.0200, subp. 6.

IV. EXEMPTIONS REQUESTED

A. Minn. Rules 7849.0260, subps. A(3) and C(6) – Losses

Minn. Rule 7849.0260, subp. A(3) requires the applicant to provide 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.” Subpart C(6) of the rule requires similar information (efficiency of proposed system under maximum and average loading along the length of the line). The electrical grid operates as a single, integrated system, which prevents electricity from being “directed” along a particular

⁶ Western Minnesota Municipal Power Agency owns generation and transmission facilities, the capacity and output of which are sold to Missouri River Energy Services. Missouri River Energy Services provides energy and energy services to its 61 member municipal utilities, including conservation program services.

line or set of lines. Consequently, losses take place across the entire transmission system and is not isolated to a few transmission lines within the integrated regional electric grid. It is necessary, therefore, to calculate losses across the system affected by the addition of new transmission lines, rather than the losses attributable to the transmission addition itself.

The Applicants request an exemption from Minn. Rules 7849.0260, subs. A(3) and C(6) and propose to provide system losses in lieu of line-specific losses required by the rules. Our proposal is consistent with the approach previously approved by the Commission in several other Certificate of Need transmission line dockets.⁷

B. Minn. Rules 7849.0270, subs. 1 through 6 – Forecasting

The Applicants seek an exemption from the content requirements of Minn. Rule 7849.0270, subs. 1-6 which concerns forecasting information. Instead, the Applicants propose to provide substitute forecast information that was used by MISO and the Applicants in studying, planning, and analyzing the Project. This data will include PROMOD production costs analyses MISO used in the MTEP21. This substitute data will better inform the record than the specific forecast data identified in this Rule.

The Commission's rules addressing Certificate of Need content requirements were designed decades ago at a time when the transmission improvements under consideration were typically driven by growing demand for electricity and linked directly to a specific generator proposed to meet that need. Consequently, the rules were designed around the concept that a utility provide detailed forecasts of power demand and electricity consumption to demonstrate the need for a specific generating plant that, in turn, justified the need for the proposed transmission capacity.

The Project is needed for multiple reasons including addressing thermal and voltage issues and to provide additional transmission capacity to integrate renewable generation in the region. Rather than providing the forecasting information required by Minn. Rule 7849.0270, the Applicants will provide information regarding the forecasts used by MISO and the Applicants to assess the need for the Project which will better inform the record in this proceeding.

⁷ *In the Matter of the Application of Xcel Energy for a Certificate of Need for Two Gen-Tie Lines From Sherburne County to Lyon County, Minnesota*, Docket No. E002/CN-22-131, ORDER (June 28, 2022); *In the Matter of the Application of Xcel Energy and ITC Midwest, LLC for the Huntley - Wilmarth 345 KV Transmission Line Project*, Docket No. E002,ET-6675/CN-17-184, ORDER (September 1, 2017); *In the Matter of the Application of Northern States Power Company d/b/a Xcel Energy for a Certificate of Need for the Upgrade of the Southwest Twin Cities Bluff Creek – Westgate Area 69 kV Transmission Line to 115 kV Capacity*, Docket No. E002/CN-11-332, ORDER GRANTING APPLICANT'S EXEMPTION REQUEST (Nov. 16, 2011).

C. Minn. Rules 7849.0270, subp. 2(E) – Annual Revenue Requirements

Minn. Rule 7849.0270, subp. 2(E) requires an estimate of the “annual revenue requirement per kilowatt-hour for the system in current dollars.” The Applicants request an exemption from this rule and propose instead to provide general information regarding how the costs for LRTP projects are shared within the MISO footprint. This substitute information will better inform the record regarding the need and cost of the entire LRTP Tranche 1 Portfolio.

D. Minn. Rule 7849.0280, subps. (B) through (I) – System Capacity

Minn. Rule 7849.0280, subps. (B) through (I) pertain to system capacity and generation data. The general purpose of this section is to provide a discussion of the ability of the existing system to meet the forecasted demand for electrical energy in response to Minn. Rule 7849.0270. However, Minn. Rule 7849.0270, subps. (B) through (I) pertain to an examination of generation adequacy and do not address transmission planning considerations. The Applicants request that the Commission grant an exemption to Minn. Rule 7849.0280, subps. (B) through (I). The Commission has previously granted exemption requests from Minn. Rule 7849.0280, subps. (B) through (I) in several other transmission line Certificate of Need dockets where, as here, issues of transmission adequacy, rather than generation adequacy, were at issue.⁸

E. Minn. Rule 7849.0290 – Conservation Programs

Minn. Rule 7849.0290 requires a Certificate of Need application to provide information related to conservation programs the applicant has in place and their effect on the forecast information required by Minn. Rule 7849.0270. The Applicants request an exemption from Minn. Rule 7849.0290 and instead will provide substitute information related either to their conservation programs or to the conservation programs that are available to their members serving load in Minnesota. The Applicants will also provide information regarding how conservation and energy efficiency was considered by MISO in its evaluation of the Project. This information will better inform the record as to the need for the Project.

F. Minn. Rule 7849.0300 – Consequences of Delay and Minn. Rule 7849.0340 – No Facility Alternative

Minn. Rule 7849.0300 requires detailed information regarding the consequences of delay on three specific statistically-based levels of demand and energy consumption.

⁸ *Id.* See also *In the Matter of the Application of Minnesota Power for a Certificate of Need for the HVDC Modernization Project*, Docket No. E015/CN-22-607, ORDER (Feb. 1, 2023) (approving applicant’s exemption requests through the Commission’s consent agenda).

Minn. Rule 7849.0340 requires a discussion of the impact on existing generation and transmission facilities at the three levels of demand specified in Minn. Rule 7849.0300 for the no-build alternative. Such a discussion is an important element of a determination of the need for new transmission infrastructure. While the Applicants will evaluate the consequences of delay and a no build alternative, the Applicants request a variance from the portions of these rules that require the examination to incorporate the three specific levels of demand required by Minn. Rule 7849.0300. Similar requests for exemptions from the requirements of Minn. Rules 7849.0300 and 7849.0340 were approved by the Commission in other recent transmission line Certificate of Need dockets.⁹

V. CONCLUSION

The Applicants respectfully request that the Commission grant the exemptions requested herein so that the Certificate of Need application provides focused information to evaluate the need for the proposed Project.

⁹ *Id.*

Dated: March 10, 2023

Respectfully submitted,

**NORTHERN STATES POWER
COMPANY**, a Minnesota corporation

/s/ Matthew B. Harris

Matthew B. Harris
Managing Attorney for State Regulatory
401 Nicollet Mall, 8th Floor
Minneapolis, MN 55401
(612) 330-6600
Matt.B.Harris@xcelenergy.com

OTTER TAIL POWER COMPANY,
a Minnesota corporation

/s/ Robert M. Endris

Robert M. Endris
Associate General Counsel
215 South Cascade Street
Fergus Falls, MN 56537
(218) 739-8234
rendris@otpc.com

MINNESOTA POWER,
a Minnesota corporation

/s/ David R. Moeller

David R. Moeller
ALLETE Senior Regulatory Counsel
30 West Superior Street
Duluth, MN 55802
(218) 723-3963
dmoeller@allete.com

GREAT RIVER ENERGY,
a Minnesota cooperative corporation

/s/ Brian Meloy

Brian Meloy
Associate General Counsel
12300 Elm Creek Blvd. N.
Maple Grove, MN 55369
(763) 445-5212
bmeloy@GREnergy.com

**WESTERN MINNESOTA MUNICIPAL
POWER AGENCY,**

a Minnesota municipal power agency

/s/ David C. McLaughlin

David C. McLaughlin
Fluegel, Anderson, McLaughlin & Brutlag,
Chartered
129 NW 2nd Street
Ortonville, MN 56278
(320)839-2549
dmclaughlin@fluegellaw.com

**Certificate of Need Application
Completeness Checklist**

AUTHORITY	REQUIRED INFORMATION	EXEMPTION REQUESTED?
Minn. R. 7829.2500, subp. 2	Brief summary of filing on separate page sufficient to apprise potentially interested parties of its nature and general content	No
Minn. R. 7849.0200, subp. 2	Title Page and Table of Contents	No
Minn. R. 7849.0200, subp. 4	Cover Letter	No
Minn. R. 7849.0220, subp. 3	Joint Ownership and Multiparty use	No
Minn. R. 7849.0240	Need summary and additional considerations	No
subp. 1	Summary of the major factors that justify the need for the proposed facility	No
subp. 2	Relationship of the proposed facility to the following socioeconomic considerations:	-
A.	Socially beneficial uses of the output of the facility	No
B.	Promotional activities that may have given rise to the demand for the facility	No
C.	Effects of the facility in inducing future development	No
Minn. R. 7849.0260	Proposed LHVTL and Alternatives	-
A.	A description of the type and general location of the proposed line, including:	-
(1)	Design voltage	No
(2)	Number, sizes and types of conductors	No

AUTHORITY	REQUIRED INFORMATION	EXEMPTION REQUESTED?
(3)	Expected losses under projected maximum loading and under projected average loading in the length of the line and at terminals or substations	<p>Exemption Requested</p> <p>The Applicants request to be exempt from providing line-specific loss information. The Applicants propose to provide substitute data in the form of overall system losses.</p>
(4)	Approximate length of the proposed line	No
(5)	Approximate locations of DC terminals or AC substations on a map	No
(6)	List of likely affected counties	No
B.	Discussion of the available alternatives including:	-
(1)	New generation	No
(2)	Upgrading existing transmission lines	No
(3)	Transmission lines with different voltages or conductor arrays	No
(4)	Transmission lines with different terminals or substations	No
(5)	Double circuiting of existing transmission lines	No
(6)	If facility for DC (AC) transmission, an AC (DC) transmission line	No
(7)	If proposed facility is for overhead (underground) transmission, an underground (overhead) transmission line	No
(8)	Any reasonable combination of alternatives (1) – (7)	No
C.	For the facility and for each alternative in B, a discussion of:	-
(1)	Total cost in current dollars	No
(2)	Service life	No

AUTHORITY	REQUIRED INFORMATION	EXEMPTION REQUESTED?
(3)	Estimated average annual availability	No
(4)	Estimated annual O&M costs in current dollars	No
(5)	Estimate of its effect on rates system wide and in Minnesota	No
(6)	Efficiency	Exemption Requested The Applicants request to be exempt from providing line-specific loss information. The Applicants propose to provide substitute data in the form of overall system losses.
(7)	Major assumptions made in subitems (1) – (6)	No
D.	A map (of appropriate scale) showing the applicant's system or load center to be served by the proposed LHVTL	No
E.	Such other information about the proposed facility and each alternative as may be relevant to determination of need.	No
Minn. R. 7849.0270	Content of Forecast	–
Minn. R. 7849.0270, subp. 1	Peak demand and annual consumption data	Exemption Requested The Applicants request to be exempt from providing specific forecasting and capacity information. The Applicants propose to provide substitute forecast information used in analyzing the need for the Project.
Minn. R. 7849.0270, subp. 2	For each forecast year the following data:	–
A.	Minnesota forecast data	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
B.	Estimates of the number of ultimate consumers and annual electrical consumption by those consumers:	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
(1)	Farm, excluding irrigation and drainage pumping	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1

AUTHORITY	REQUIRED INFORMATION	EXEMPTION REQUESTED?
(2)	Irrigation and drainage pumping	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
(3)	Nonfarm residential	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
(4)	Commercial	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
(5)	Mining	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
(6)	Industrial	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
(7)	Street and highway lighting	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
(8)	Electrified transportation ¹	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
(9)	Other	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
(10)	Sum of subitems (1) – (9)	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
C.	Estimate of the demand for power in system at the time of annual system peak demand	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
D.	System peak demand by month	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
E.	Estimated annual revenue requirement per kWh in current dollars	Exemption Requested The Applicants request to be exempt from providing annual revenue requirements for the Project. The Applicants propose to provide general information regarding how the costs for LRTP projects are shared within the MISO footprint.
F.	Estimated average weekday load factor by month	Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1
Minn. R. 7849.0270, subp. 3	Forecast Methodology	—

¹ Electrified transportation is included in the column labeled “other.”

AUTHORITY	REQUIRED INFORMATION	EXEMPTION REQUESTED?
	Detail of forecast methodology including:	Exemption Requested <i>See Minn. R. 7849.0270, subp. 1</i>
A.	Overall methodological framework used	Exemption Requested <i>See Minn. R. 7849.0270, subp. 1</i>
B.	Specific analytical used	Exemption Requested <i>See Minn. R. 7849.0270, subp. 1</i>
C.	Manner in which specific techniques are related in producing the forecast	Exemption Requested <i>See Minn. R. 7849.0270, subp. 1</i>
D.	Where statistical techniques are used:	Exemption Requested <i>See Minn. R. 7849.0270, subp. 1</i>
(1)	Purpose of the technique	Exemption Requested <i>See Minn. R. 7849.0270, subp. 1</i>
(2)	Typical computations	Exemption Requested <i>See Minn. R. 7849.0270, subp. 1</i>
(3)	Results of statistical tests	Exemption Requested <i>See Minn. R. 7849.0270, subp. 1</i>
E.	Forecast confidence levels for annual peak demand and annual electrical consumption	Exemption Requested <i>See Minn. R. 7849.0270, subp. 1</i>
F.	Brief analysis of methodology including:	Exemption Requested <i>See Minn. R. 7849.0270, subp. 1</i>
(1)	Strengths and weaknesses	Exemption Requested <i>See Minn. R. 7849.0270, subp. 1</i>
(2)	Suitability to the system	Exemption Requested <i>See Minn. R. 7849.0270, subp. 1</i>
(3)	Cost considerations	Exemption Requested <i>See Minn. R. 7849.0270, subp. 1</i>
(4)	Data requirements	Exemption Requested <i>See Minn. R. 7849.0270, subp. 1</i>
(5)	Past accuracy	Exemption Requested <i>See Minn. R. 7849.0270, subp. 1</i>
(6)	Other significant factors	Exemption Requested <i>See Minn. R. 7849.0270, subp. 1</i>

AUTHORITY	REQUIRED INFORMATION	EXEMPTION REQUESTED?
G.	Explanation of discrepancies	Exemption Requested <i>See Minn. R. 7849.0270, subp. 1</i>
Minn. R. 7849.0270, subp. 4	Discussion of data base used for forecasts including:	—
A.	List of data sets including a brief description of each	Exemption Requested <i>See Minn. R. 7849.0270, subp. 1</i>
B.	Identification of adjustments made to raw data including nature, reason and magnitude	Exemption Requested <i>See Minn. R. 7849.0270, subp. 1</i>
Minn. R. 7849.0270, subp. 5	Assumptions and Special Information	—
	Discussion of each essential assumption including need and nature of assumption and sensitivity of forecast results to assumptions	Exemption Requested <i>See Minn. R. 7849.0270, subp. 1</i>
	Discussion of assumptions regarding:	Exemption Requested <i>See Minn. R. 7849.0270, subp. 1</i>
A.	Availability of alternative sources of energy	Exemption Requested <i>See Minn. R. 7849.0270, subp. 1</i>
B.	Expected conversion from other fuels to electricity or vice versa	Exemption Requested <i>See Minn. R. 7849.0270, subp. 1</i>
C.	Future prices for customers and their effect on demand	Exemption Requested <i>See Minn. R. 7849.0270, subp. 1</i>
D.	Data requested in subp. 2 not historically available or generated by applicant for demand forecast	Exemption Requested <i>See Minn. R. 7849.0270, subp. 1</i>
E.	Effect of energy conservation programs on long term demand	Exemption Requested <i>See Minn. R. 7849.0270, subp. 1</i>
F.	Other factors considered when preparing forecast	Exemption Requested <i>See Minn. R. 7849.0270, subp. 1</i>
Minn. R. 7849.0270, subp. 6	Coordination of Forecasts with Other Systems	—
A.	Extent of coordination of load forecasts with those of other systems	Exemption Requested <i>See Minn. R. 7849.0270, subp. 1</i>
B.	Description of the manner in which those forecasts are coordinated	Exemption Requested <i>See Minn. R. 7849.0270, subp. 1</i>

AUTHORITY	REQUIRED INFORMATION	EXEMPTION REQUESTED?
Minn. R. 7849.0280	System Capacity	—
	Description of ability of existing system to meet demand forecast including:	—
A.	Power planning programs	No
B.	Seasonal firm purchases and sales	Exemption Requested
C.	Seasonal participation purchases and sales	Exemption Requested
D.	For each forecast year load and generating capacity for:	Exemption Requested
(1)	Seasonal system demand	Exemption Requested
(2)	Annual system demand	Exemption Requested
(3)	Total seasonal firm purchases	Exemption Requested
(4)	Total seasonal firm sales	Exemption Requested
(5)	Seasonal adjusted net demand	Exemption Requested
(6)	Annual adjusted net demand	Exemption Requested
(7)	Net generating capacity	Exemption Requested
(8)	Total participation purchases	Exemption Requested
(9)	Total participation sales	Exemption Requested
(10)	Adjusted net capability	Exemption Requested

AUTHORITY	REQUIRED INFORMATION	EXEMPTION REQUESTED?
(11)	Net reserve capacity obligation	Exemption Requested
(12)	Total firm capacity obligation	Exemption Requested
(13)	Surplus or deficit capacity	Exemption Requested
E.	Summer and winter season load generation and capacity in years subsequent to application contingent on proposed facility	Exemption Requested
F.	Summer and winter season load generation and capacity including all projected purchases, sales and generation in years subsequent to application	Exemption Requested
G.	List of proposed additions and retirements in generating capacity for each forecast year subsequent to application	Exemption Requested
H.	Graph of monthly adjusted net demand and capability with difference between capability and maintenance outages plotted	Exemption Requested
I.	Appropriateness and method of determining system reserve margins	Exemption Requested
Minn. R. 7849.0290	Conservation Programs	—
A.	Persons responsible for energy conservation and efficiency programs	<p>Exemption Requested</p> <p>The Applicants request to be exempt from discussing conservation programs and their effect on the forecast information required by Minn. R. 7849.0270. The Applicants propose to provide substitute information related either to their conservation programs or to the conservation programs that are available to their members serving load in Minnesota. The Applicants will also provide information regarding how conservation and energy efficiency was considered by MISO in its evaluation of the Project.</p>
B.	List of energy conservation and efficiency goals and objectives	Exemption Requested

AUTHORITY	REQUIRED INFORMATION	EXEMPTION REQUESTED?
C.	Description of programs considered, implemented and rejected	Exemption Requested
D.	Description of major accomplishments in conservation and efficiency	Exemption Requested
E.	Description of future plans with respect to conservation and efficiency	Exemption Requested
F.	Quantification of the manner by which these programs impact the forecast	Exemption Requested
Minn. R. 7849.0300	Consequence of Delay	Exemption Requested The Applicants request to be exempt from providing analysis using three confidence levels. The Applicants propose to provide substitute data regarding potential impacts caused by delay in building the Project.
Minn. R. 7849.0310	Required Environmental Information	No
Minn. R. 7849.0330	Transmission Facilities	—
	Data for each alternative that would require LHVTL construction including:	—
A.	For overhead transmission lines	—
(1)	Schematics showing dimensions of support structures	No
(2)	Discussion of electric fields	No
(3)	Discussion of ozone and nitrogen oxide emissions	No
(4)	Discussion of radio and television interference	No
(5)	Discussion of audible noise	No

AUTHORITY	REQUIRED INFORMATION	EXEMPTION REQUESTED?
B.	For underground transmission facilities:	N/A
(1)	Types and dimensions of cable systems	N/A
(2)	Types and qualities of cable system materials	N/A
(3)	Heat released in kW per foot of cable	N/A
C.	Estimated right-of-way required for the facility	No
D.	Description of construction practices	No
E.	Description of O&M practices	No
F.	Estimated workforce required for construction and O&M	No
G.	Description of region between endpoints in likely area for routes emphasizing a three-mile radius of endpoints including:	No
(1)	Hydrological features	No
(2)	Vegetation and wildlife	No
(3)	Physiographic regions	No
(4)	Land use types	No
Minn. R. 7849.0340	No-Facility Alternative	<p>Exemption Requested</p> <p>The Applicants request to be exempt from providing analysis using three confidence levels. The Applicants propose to provide substitute data regarding potential impacts caused by not building the Project.</p>

Appendix C

Applicants' Notice Plan Petition



414 Nicollet Mall
Minneapolis, MN 55401

March 10, 2023

—Via Electronic Filing—

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
350 Metro Square Building
121 Seventh Place East
St. Paul, MN 55101

Re: IN THE MATTER OF THE APPLICATION FOR A CERTIFICATE OF NEED FOR THE
BIG STONE SOUTH – ALEXANDRIA – BIG OAKS TRANSMISSION PROJECT
DOCKET NO. E002, E017, ET2, E015, ET10/CN-22-538

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, along with Great River Energy, Minnesota Power, Otter Tail Power Company, and Western Minnesota Municipal Power Agency (collectively, the Applicants) submit this Notice Plan for approval by the Minnesota Public Utilities Commission (the Commission) pursuant to Minn. Rule 7829.2550. In accordance with Minn. Rule 7829.2550, subp. 1, copies of this Notice Plan have been provided to the Minnesota Department of Commerce, the Minnesota Office of Attorney General Residential Utilities and Antitrust Division, and to persons listed on the “General List of Persons Interested in Power Plans and Transmission Lines” as maintained by the Commission under Minn. Rule 7850.2100, subp. 1(A). Please contact me at bria.e.shea@xcelenergy.com or 612-330-6064 if you have any questions regarding this filing.

Sincerely,

/s/ Bria E. Shea

BRIA E. SHEA
REGIONAL VICE PRESIDENT, REGULATORY POLICY

cc: Minnesota Department of Commerce
Minnesota Office of Attorney General Residential Utilities and Antitrust Division
Service List(s)

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

Katie J. Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF THE APPLICATION
FOR A CERTIFICATE OF NEED FOR THE
BIG STONE SOUTH – ALEXANDRIA – BIG
OAKS TRANSMISSION PROJECT

MPUC Docket No. E002, E017, ET2,
E015, ET10/CN-22-538

NOTICE PLAN PETITION

**Public Comments on this Notice Plan Petition can be submitted to the
Minnesota Public Utilities Commission until 4:30 P.M. March 30, 2023.**

**Replies to Comments can be submitted to the Minnesota Public Utilities
Commission until 4:30 P.M. April 19, 2023.**

**The Minnesota Public Utilities Commission’s address is: Minnesota Public
Utilities Commission, 121 7th Place East, Suite 350, St. Paul, MN 55101-2147**

I. INTRODUCTION

Northern States Power Company, doing business as Xcel Energy (Xcel Energy), along with Great River Energy, Minnesota Power, Otter Tail Power Company (Otter Tail), and Western Minnesota Municipal Power Agency (Western Minnesota) (collectively, the Applicants) submit this Notice Plan for approval by the Minnesota Public Utilities Commission (the Commission) pursuant to Minn. Rule 7829.2550. This Notice Plan is intended to provide notice to all persons reasonably likely to be affected by the Minnesota portion of the Big Stone South – Alexandria – Big Oaks 345 kilovolt (kV) Transmission Line Project (the Project).¹

The Project consists of a new 345 kV transmission line between Big Stone City, South Dakota, and Sherburne County, Minnesota which will be comprised of two segments.

- The western segment will run from the existing Big Stone South Substation near Big Stone City, South Dakota to the existing Alexandria Substation near Alexandria, Minnesota (Western Segment); and
- The eastern segment will continue on from the existing Alexandria Substation to a new Big Oaks Substation in Sherburne County, Minnesota (Eastern Segment).²

The Applicants intend to include both segments in a single Certificate of Need application and each segment in separate Route Permit applications. The proposed 345 kV transmission lines will traverse Grant County in South Dakota and Big Stone, Lac Qui Parle, Swift, Kandiyohi, Stevens, Pope, Douglas, Todd, Stearns, Wright, and Sherburne counties in Minnesota. The proposed Project is shown on **Attachment A, Figure 1**.

The Project was studied, reviewed, and approved as part of the Long-Range Transmission Planning (LRTP) Tranche 1 Portfolio by the Midcontinent Independent System Operator, Inc.'s (MISO) Board of Directors in July 2022 as part of its 2021 Transmission Expansion Plan (MTEP21) report.³ The Applicants filed a notice of intent to construct, own, and maintain the Project with the Commission on October 12, 2022.

The LRTP Tranche 1 Portfolio will provide significant benefits to the Midwest subregion of the MISO footprint by facilitating more reliable, safe, and affordable energy delivery. The Project, designated as LRTP#2 in MTEP21, is a key part of the

¹ The Cassie's Crossing Substation has been renamed the Big Oaks Substation.

² The Western Segment and the Eastern Segment are herein referred to collectively as the Project.

³ A copy of MTEP21 report is available online at: <https://cdn.misoenergy.org/MTEP21%20Addendum-LRTP%20Tranche%201%20Report%20with%20Executive%20Summary625790.pdf>.

LRTP Tranche 1 Portfolio. More specifically, the existing 230 kV transmission system in eastern North Dakota and South Dakota plays a key role in transporting and delivering energy to customers in Minnesota. The 230 kV system is at its capacity leading to a number of reliability concerns that could affect customers' service. The Project is needed to provide additional transmission capacity, to mitigate current capacity issues, and to improve electric system reliability throughout the region as more renewable energy resources are added to the electric system in and around the region.

Minn. Rule 7829.2550 requires a Notice Plan to be submitted for review by the Commission at least three months before filing a Certificate of Need application for any high voltage transmission line under Minn. Stat. § 216B.243. The Applicants therefore submit this Notice Plan for the Commission's approval.

II. NOTICE PLAN PROPOSAL

The Applicants file this Notice Plan Petition and intend to file a Certificate of Need application for the entire Minnesota portion of the Project pursuant to Minn. Stat. § 216B.243 in the third quarter of 2023. Two separate Route Permit applications are being planned for the Project—one for the Western Segment and one for the Eastern Segment. Xcel Energy is leading this Notice Plan Petition and eventual Certificate of Need application for the Minnesota portion of the Project on behalf of the Applicants. Xcel Energy is also leading the Route Permit application for the Eastern Segment on behalf of the Applicants and will file that Route Permit application in accordance with Minn. Stat. § 216E.03.

Otter Tail and Missouri River Energy Services, on behalf of Western Minnesota, are assessing route alternatives for the Western Segment between the Big Stone South Substation in South Dakota and the Alexandria Substation in Minnesota. This assessment involves evaluating route alternatives, identifying opportunities and constraints, conducting stakeholder outreach including engaging applicable governmental and regulatory agencies, developing engineering, design, and construction information and preparing the Route Permit application. Otter Tail will lead the Route Permit application for the Western Segment and will file the application on behalf of itself and Western Minnesota in accordance with Minnesota Statutes § 216E.03. Otter Tail and Western Minnesota will also file the Route Permit application in South Dakota, along with any other applicable permits required within South Dakota, for the portion of the Western Segment that will be located in South Dakota.

This Notice Plan is prepared as an initial step in the Certificate of Need regulatory process. Preparation of a Notice Plan, and its review and approval by the

Commission, will ensure that interested persons are aware of the proceeding and have the opportunity to participate.

The area proposed to be included in notices under this proposal (Notice Area) is depicted in **Attachment A, Figure 1**. The Notice Area for the Western Segment, between the South Dakota border and the Alexandria Substation, is a wide area as potential routes for the new 345 kV transmission line for this portion of the Project are in development. The Notice Area for the Eastern Segment, between the Alexandria Substation and the Big Oaks Substation, is narrower as the majority of the Eastern Segment will involve stringing a second 345 kV circuit on existing transmission line structures. The Notice Area near the new Big Oaks Substation along the Eastern Segment is slightly wider to accommodate the development of route alternatives to connect the new 345 kV transmission line to this new substation.

A. Direct Mail Notice

Attachment A presents a letter that will be mailed to landowners, residents, local units of government, elected officials, tribal contacts, and agencies in and around the Notice Area.

1. Landowners

Minn. Rule 7829.2550, subp. 3(A) requires an applicant for a Certificate of Need to provide direct mail notice to all landowners reasonably likely to be affected by the proposed transmission line. The Applicants will compile landowner names and addresses within the Notice Area using tax records.

2. Mailing Addresses

Minn. Rule 7829.2550, subp. 3(B) requires an applicant for a Certificate of Need to provide direct mail notice to all mailing addresses in the area that are reasonably likely to be affected by the proposed transmission line. The Applicants will obtain a list of mailing addresses in the Notice Area and remove addresses common to the landowner list.

3. Tribal Governments

Minn. Rule 7829.2550, subp. 3(C) requires an applicant for a Certificate of Need to provide direct mail notice to tribal governments whose jurisdictions are reasonably likely to be affected by the proposed transmission line. A list of tribal governments and tribal government officials that will receive notice as part of this Notice Plan is included in **Attachment B**.

4. Local Governments

Minn. Rule 7829.2550, subp. 3(C) requires an applicant to provide direct mail notice to governments of towns, cities, home rule charter cities, and counties whose jurisdictions are reasonably likely to be affected by the proposed transmission line. The Applicants propose to provide direct mail notice to lead administration personnel in the towns, cities, home rule charter cities, and counties within the Notice Area. The notice will also be provided to the elected officials of those local units of government and to those State Senators and State Representatives whose districts are within the Notice Area. A complete list of government recipients is included in **Attachment B**.

B. Newspaper Notice.

Minn. Rule 7829.2550, subp. 3(D) requires an applicant to publish notice in newspapers in the areas reasonably likely to be affected by the transmission line. The proposed notice text is provided in **Attachment C**. The Applicants propose to place notice advertisements in the newspapers listed in **Table 1** below.

Table 1. Newspaper Notice.

Name of Newspaper	County in General Circulation
Star Tribune	Statewide
Ortonville Independent	Big Stone County
Alexandria Echo Press	Douglas County
Elbow Lake Grant County Herald	Grant County
Wilmar West Tribune	Kandiyohi County
Dawson Sentinel	Lac qui Parle County
Glenwood Pope County Tribune	Pope County
Becker Patriot News	Sherburne County
Cold Spring Record	Stearns County
St. Cloud Times	Stearns County
Morris/Hancock Stevens County Times	Stevens County
Appleton Press	Swift County

Swift County Monitor	Swift County
Long Prairie Leader	Todd County
Wright County Journal Press	Wright County

After the filing of a Certificate of Need application, Minn. Rule 7829.2500, subp. 5 requires the applicant to publish newspaper notice of the filing in a newspaper of general circulation throughout the state. Given that under the proposed Notice Plan, the Applicants will publish newspaper notice of the Certificate of Need proceeding shortly before a Certificate of Need application is filed in the newspapers of local, regional, and statewide circulation, the Applicants request a variance of Minn. Rule 7829.2500, subp. 5, to remove this additional newspaper notice requirement.

The Commission shall grant a variance pursuant to Minn. Rule 7829.3200 when it determines that the following three requirements are met:

1. enforcement of the rule would impose an excessive burden upon the applicant or others affected by the rule;
2. granting the variance would not adversely affect the public interest; and
3. granting the variance would not conflict with standards imposed by law.

All three requirements are met in this instance. Per the Applicants’ proposed Notice Plan, notice of the Project will be published in a statewide newspaper within 30 days of the Commission’s approval of the plan. The rule would be an excessive burden on the Applicants because it would require an additional newspaper notice to be provided after the Certificate of Need application is filed, which will be close in time to the newspaper notice provided as part of the proposed Notice Plan. The public interest will not be adversely affected because notice of the Project in a statewide newspaper will be provided prior to the filing of the Certificate of Need application as part of the implementation of the Notice Plan. Granting the variance will not conflict with any legal standards as notice of the Project will still be provided in a statewide newspaper. As all three factors are met here, a variance of Minn. Rule 7829.2500, subp. 5 should be granted.

C. Notice Content

Minn. Rule 7829.2550, subp. 4 requires notice packets to include several pieces of information including: a map; right-of-way requirements and statement of intent to acquire property rights; notice that the transmission upgrade cannot be constructed unless the Commission certifies that it is needed; Commission contact information; utility website information; a statement that the Minnesota Department of Commerce, Energy Environmental Review and Analysis (EERA) staff will prepare an environmental report; an explanation of how to get on the Project's mailing list; and a list of applicable regulatory laws and rules. As shown in the Example Landowner Notice (**Attachment A**) the Applicants' notice mailing will include these requirements.

The notice letter will serve three purposes: 1) to introduce and explain the need and location of the Project; 2) to encourage potentially-affected persons to participate in the regulatory process; and 3) to provide contact information for citizens and officials to obtain additional information about the Project and the regulatory process. The map (**Attachment A, Figure 1**) that will be included with the notice letter will depict the transmission line endpoints, existing transmission lines and substations, counties, townships, and notable landmarks to aid in orientation.

D. Distribution of Notice Plan Filing

As required under Minn. Rule 7829.2550, subp. 1, this Notice Plan filing has been sent to EERA, the Office of the Attorney General – Residential Utilities and Antitrust Division, and to those parties listed on the “General List of Persons Interested in Power Plants and Transmission Lines.”

III. CONCLUSION

The Applicants respectfully request that the Commission: (1) approve this Notice Plan; and (2) grant the variance from duplicative newspaper notice requirements under Minn. Rule 7829.2500, subp. 5.

Dated: March 10, 2023

Respectfully submitted,

**NORTHERN STATES POWER
COMPANY**, a Minnesota corporation

/s/ Matthew B. Harris

Matthew B. Harris
Managing Attorney for State Regulatory
401 Nicollet Mall, 8th Floor
Minneapolis, MN 55401
(612) 330-6600
Matt.B.Harris@xcelenergy.com

OTTER TAIL POWER COMPANY,
a Minnesota corporation

/s/ Robert M. Endris

Robert M. Endris
Associate General Counsel
215 South Cascade Street
Fergus Falls, MN 56537
(218) 739-8234
rendris@otpc.com

MINNESOTA POWER,
a Minnesota corporation

/s/ David R. Moeller

David R. Moeller
ALLETE Senior Regulatory Counsel
30 West Superior Street
Duluth, MN 55802
(218) 723-3963
dmoeller@allete.com

GREAT RIVER ENERGY,
a Minnesota cooperative corporation

/s/ Brian Meloy

Brian Meloy
Associate General Counsel
12300 Elm Creek Blvd. N.
Maple Grove, MN 55369
(763) 445-5212
bmeloy@GREnergy.com

**WESTERN MINNESOTA MUNICIPAL
POWER AGENCY,**

a Minnesota municipal power agency

/s/ David C. McLaughlin

David C. McLaughlin
Fluegel, Anderson, McLaughlin & Brutlag,
Chartered
129 NW 2nd Street
Ortonville, MN 53278
(320) 839-2549
dmclaughlin@fluegellaw.com

Example Notice Letter

_____, 2023

RE: Notice of Certificate of Need Application for the Big Stone South – Alexandria – Big Oaks Transmission Project

MPUC Docket No. E002, E017, ET2, E015, ET10/CN-22-538

This letter is intended to notify you of a proposed transmission line project and to:

1. Outline general Project location and a description of the need for the Project;
2. Describe how you can participate in the regulatory process; and
3. Provide contact information to receive additional information and to sign up for email and mailing lists.

Northern States Power Company, doing business as Xcel Energy (Xcel Energy), along with Great River Energy, Minnesota Power, Otter Tail Power Company (Otter Tail), and Missouri River Energy Services on behalf of Western Minnesota Municipal Power Agency (Western Minnesota) (collectively, the Applicants) are proposing to construct a new 345 kV transmission line between Big Stone City, South Dakota, and Sherburne County, Minnesota, which will be comprised of two segments (collectively referred to as the Project):

- The western segment will run from the existing Big Stone South Substation near Big Stone City, South Dakota to the existing Alexandria Substation near Alexandria, Minnesota (Western Segment); and
- The eastern segment will continue on from the existing Alexandria Substation to a new Big Oaks Substation in Sherburne County, Minnesota (Eastern Segment).

The majority of the Eastern Segment of the Project will include adding a second set of wires that will be strung on existing transmission line structures except for a short one-to four-mile segment of new construction to connect the new 345 kV transmission line to the new Big Oaks Substation. Proposed routes for the Western Segment of the Project are currently under evaluation by Otter Tail and Missouri River Energy Services, on behalf of Western Minnesota.

This notice is being provided to you because you fall into one of the categories listed below as they relate to the area shown in the attached “Notice Area” map.

- Landowners with property within the Notice Area;
- Residents living within the Notice Area;
- Local units of government in and around the Notice Area;
- State elected officials; and
- Government agencies and offices.

Why is the Project needed?

The Project is a key part of a portfolio of new transmission projects that is necessary to maintain a reliable, safe, and affordable transmission system in the Upper Midwest. The existing 230 kV transmission system in eastern North Dakota and South Dakota plays a key role in transporting and delivering energy into Minnesota. The 230 kV system is at its capacity, leading to a number of reliability concerns that could affect customers' service. The Project is needed to provide additional transmission capacity, to mitigate current capacity issues, and to improve electric system reliability throughout the region as more renewable energy resources are added to the electric system in and around the region.

What is the regulatory process for the Project?

Before construction can begin on the Project, the Minnesota Public Utilities Commission (the Commission) must determine whether the Project is needed in a Certificate of Need proceeding. If the Commission determines the Project is needed, it will then determine where the Project should be built through Route Permit proceedings.

The Certificate of Need process is governed by Minnesota law, including Minnesota Statutes Section 216B.243, and Minnesota Rules Chapters 7829 and 7849, specifically, Rules 7849.0010 to 7849.0400 and 7849.1000 to 7849.2100. A copy of the Certificate of Need application, once submitted, can be obtained by visiting the Commission's website at www.mn.gov/puc/ in Docket No. E002, E017, ET2, E015, ET10/CN-22-538.

As part of the Certificate of Need process, the Minnesota Department of Commerce, Energy Environmental Review and Analysis (EERA) will prepare an environmental report as required by Minnesota Rule 7849.1200.

As noted, the Commission must also grant a Route Permit for the Project before it can be built. The routing of the Minnesota portion of the Project is governed by Minnesota law, including Minnesota Statutes Chapter 216E and Minnesota Rules Chapter 7850.

The Commission will not make these determinations until it has completed a thorough process that encourages public involvement and analyzes the impacts of the Project. The table below provides a high-level summary of the major steps in the Certificate of Need process.

Major Certificate of Need Process Steps and Summary Schedule

Step	Approximate Date
Pre-Application public meetings and stakeholder outreach	Second Quarter 2023
Certificate of Need Application submitted to Commission	Third Quarter 2023
Informational Meetings (public meeting and comment)	Fourth Quarter 2023
Environmental Report Issued	Fourth Quarter 2023/ First Quarter 2024
Public Hearings (public meeting and comment period)	First Quarter 2024/ Second Quarter 2024
Commission Decision	Second Quarter 2024/ Third Quarter 2024

How will the regulatory process be structured?

The Applicants intend to file a Certificate of Need Application for the entire Minnesota portion of the Project and two separate Route Permit applications—one for the Western Segment and one for the Eastern Segment.

Although all Applicants will participate in the regulatory process, Xcel Energy is leading the Certificate of Need application on behalf of the Applicants for the Minnesota portion of the Project and the Route Permit application for the Eastern Segment. With the exception of a short one-to four-mile 345 kV line near the new Big Oaks Substation, the Eastern Segment of the Project involves adding a second set of wires to the existing structures.

Otter Tail is leading the Route Permit application for the Western Segment on behalf of itself and Western Minnesota. Otter Tail and Missouri River Energy Services, on behalf of Western Minnesota, are assessing route alternatives for the Western Segment between the Big Stone South Substation in South Dakota and the Alexandria Substation in Minnesota by identifying opportunities and constraints, conducting stakeholder outreach, engaging applicable governmental and regulatory agencies, and developing engineering, design and construction information. Otter Tail and Western Minnesota will also file the Route Permit application in South Dakota, along with any

other applicable permits required within South Dakota, for the portion of the Western Segment that will be located in South Dakota.

How will the utilities acquire right-of-way necessary for the Project?

Before beginning construction, the utilities will acquire property rights for the right-of-way, typically through an easement that will be negotiated with the landowner for each parcel. The typical right-of-way for a transmission line operated at 345 kV is 150-foot wide. Except for a short one-to four-mile segment, the Eastern Segment of the Project involves adding a second set of wires to existing structures so new right-of-way is not anticipated to be needed for the majority of the Eastern Segment of the Project.

How can I obtain additional information about the Project?

To subscribe to the Project’s Certificate of Need docket and to receive email notifications when information is filed in that docket, please visit www.edockets.state.mn.us, click on the “Subscribe to a Docket” button, enter your email address and select “Docket Number” from the Type of Subscriptions dropdown box, then select “22” from the first Docket number drop down box and enter “538” in the second box before clicking on the “Add to List” button. You must then click the “Save” button at the bottom of the page to confirm your subscription to the Project’s Certificate of Need docket.

To be placed on the Project Certificate of Need mailing list (MPUC Docket ET6675/CN-22-538), mail, fax, or email Robin Benson at Minnesota Public Utilities Commission, 121 7th Place E., Suite 350, St. Paul, MN 55101-2147, Fax: 651-297-7073 or robin.benson@state.mn.us.

If you have questions about the state regulatory process, you may contact the Minnesota state regulatory staff listed below:

Minnesota Public Utilities Commission

[Commission contact to be added]

121 7th Place East, Suite 350

St. Paul, Minnesota 55101

651-296-0406

800-657-3782

Email: *[email to be added]*

Website: www.mn.gov/puc/

Minnesota Department of Commerce EERA

[DOC-EERA contact to be added]

85 7th Place East, Suite 280

St. Paul, Minnesota 55101

651-296-1500

800-657-3602

Email: *[email to be added]*

Website: www.mn.gov/commerce

Please visit the Project websites at: www.BigStoneSouthtoAlexandria.com (for the Western Segment) and www.AlexandriatoBigOaks.com (for the Eastern Segment) for

more information and to learn more about our upcoming informational meetings for the public. Phone numbers and e-mail addresses for the Project are as follows:

Western Segment of the Project:

Project Phone Number: 1-800-598-5587

Project e-mail address: connect@bigstonesouthtoalexandria.com

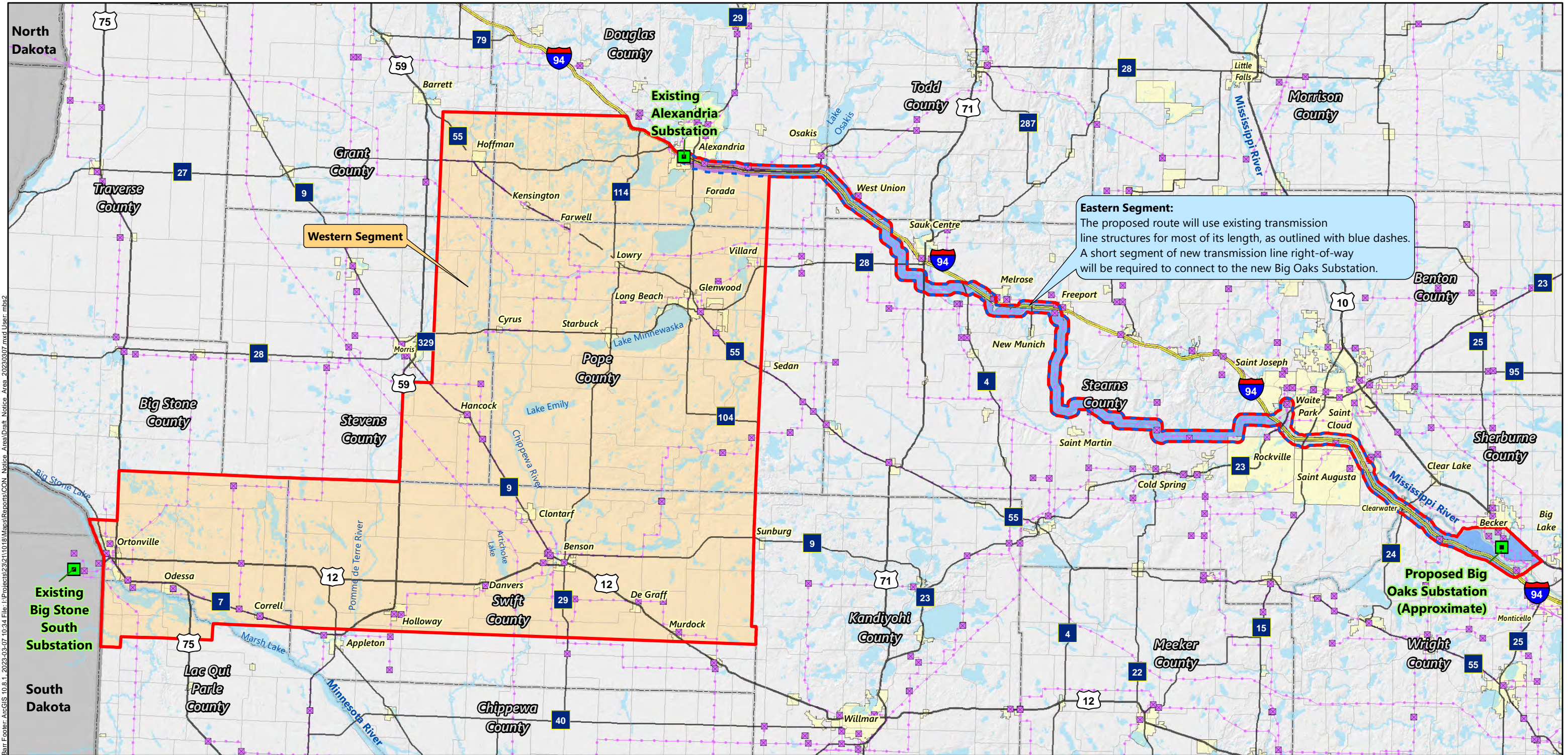
Eastern Segment of the Project:

Project Phone Number: 1-888-231-7068















Project e-mail address: AlexandriatoBigOaks@XcelEnergy.com

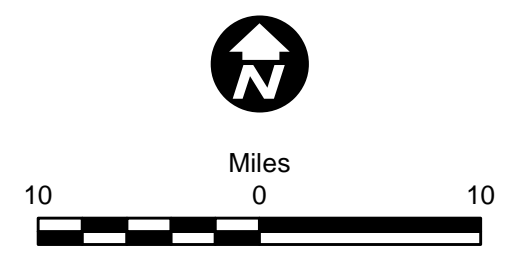
How do I learn more about other transmission projects and the transmission planning process in Minnesota?

Minnesota Statutes § 216B.2425 require that each electric transmission-owning utility in the state file a biennial transmission planning report with the Commission by November 1st of each odd-numbered year. These reports provide information on the transmission planning process used by utilities in the state of Minnesota and information about other transmission line projects. The 2021 Biennial Transmission Planning Report is available at: www.minnelectrans.com.



Barr Footer: ArcGIS 10.8.1, 2023-03-07 10:34 File: I:\Projects\2311018\MapReports\CON Notice Area\Draft Notice Area 20230307.mxd User: mbs2

-  Certificate of Need Public Notice Area
-  Western Segment
-  Eastern Segment
-  Shared Portion of the Notice Area
-  Project Substation
-  Existing Substation
-  Existing Transmission Line
-  Municipal Boundary
-  County Boundary
-  State Boundary
-  Interstate Highway
-  US Highway
-  State Highway
-  County State-Aid Highway



PUBLIC NOTICE AREA
BIG STONE SOUTH TO ALEXANDRIA
AND ALEXANDRIA TO BIG OAKS
 MISO LRTP-2 Certificate of Need Application

THE BIG STONE SOUTH – ALEXANDRIA – BIG OAKS TRANSMISSION PROJECT CERTIFICATE OF NEED STAKEHOLDER CONTACT LIST

Type	County	Municipality/Township/State Electoral District	First	Last	Title	Address	City	State	Zip
Township	Big Stone	Odessa Township	Tammy	Neubauer	Clerk	66301 440th Street	Odessa	MN	56276
Township	Big Stone	Odessa Township	Tammy	Neubauer	Clerk	PO Box 67	Odessa	MN	56276
Township	Big Stone	Artichoke Township	Amy	Larson	Clerk	39671 580th Ave	Appleton	MN	56208
Township	Big Stone	Otrrey Township	Kimberly	Danielson	Clerk	64366 360th St.	Ortonville	MN	56278
Township	Big Stone	Big Stone Township	Holly	Wellendorf	Clerk	20 2nd St SE	Ortonville	MN	56278
Township	Big Stone	Akron Township	Warren	Wiese	Clerk	41602 640th Ave	Ortonville	MN	56278
Township	Douglas	La Grand Township	Kelly	Beilke	Clerk	3999 County Road 82 NW	Alexandria	MN	56308
Township	Douglas	La Grand Township	Ben	Johnson	Chairperson	501 TownHall Road	Alexandria	MN	56308
Township	Douglas	Hudson Township	Carol	Hedlund	Clerk	3499 Caribou Lane, SE	Alexandria	MN	56308
Township	Douglas	Hudson Township	Cindy	VanLuik	Treasurer	11393 State Hwy 29 S	Alexandria	MN	56308
Township	Douglas	Urness Township	Judi	Andreasen	Clerk	4078 Shorewood Drive, SW	Kensington	MN	56343
Township	Douglas	Urness Township	Joan	Barsness	Treasurer	19590 County Road 8 NW	Brandon	MN	56315
Township	Douglas	Holmes City Township	Christopher	Wanner	Clerk/Treasurer	10983 Easy St SW, Lowry	Lowry	MN	56349
Township	Douglas	Holmes City Township	Gary	Schuneman	Chairman	11180 Tewes Trail SW	Farwell	MN	56327
Township	Douglas	Lake Mary Township	Susan	Hanson	Clerk	2640 Lodge Hall Road SW	Alexandria	MN	56308
Township	Douglas	Lake Mary Township	James	Schmidt	Chairman	4791 County Road 4 SW	Alexandria	MN	56308
Township	Douglas	Moe Township	Todd	Egenes	Clerk	9948 Cherry Point Road, SW	Alexandria	MN	56308
Township	Douglas	Moe Township	Lynn	Bushard	Chairperson	14641 Pioneer Park Rd Sw	Brandon	MN	56315
Township	Douglas	Solem Township	Marcy	Holl	Clerk	23756 Mellow Lane, SW	Kensington	MN	56343
Township	Douglas	Solem Township	Bruce	Wohlforth	Supervisor	23569 County Road 99 SW	Kensington	MN	56343
Township	Douglas	Orange Township	Jennifer	Dietrich	Clerk	8186 Molly Creek Road, SE	Osakis	MN	56360
Township	Douglas	Orange Township	Barb	Boogaard	Treasurer	11455 County Road 2 SE	Osakis	MN	56360
Township	Grant	Elk Lake Township	Peggy	Pasche	Clerk	16287 County Rd. 5	Hoffman	MN	56339
Township	Grant	Elk Lake Township	Judy	Boots	Treasurer	12502 250th	St. Barrett	MN	56311
Township	Grant	Land Township	Jeanne	Marts	Clerk	13993 Co. Rd. 23	Hoffman	MN	56339
Township	Grant	Land Township	Cheryl	Long	Treasurer	13186 Co. Rd. 5	Hoffman	MN	56339
Township	Lac qui Parle	Yellow Bank Township	Beth	Mueller	Clerk	1063 390th St.	Ortonville	MN	56278
Township	Lac qui Parle	Yellow Bank Township	Darrel	Ellefson	Chairperson	1845 287th Avenue	Dawson	MN	56232
Township	Lac qui Parle	Agassiz Township	Michael	Gloege	Clerk	1771 360th St.	Bellingham	MN	56212
Township	Lac qui Parle	Agassiz Township	Dan	Larson	Chairperson	3630 195TH AVE	Bellingham	MN	56212
Township	Pope	Nora Township	Kerri	Mattson	Clerk	35451 100th St	Kensington	MN	56343
Township	Pope	Nora Township	Josh	Andreasen	Chairman	11720 380th Ave	Kensington	MN	56343
Township	Pope	Chippewa Falls Township	Bernadine	Gerde	Clerk	27774 Lake Linka Ln	Glenwood	MN	56334
Township	Pope	Chippewa Falls Township	Brannon	Lange	Chairman	18475 Co Rd 18	Glenwood	MN	56334
Township	Pope	Bangor Township	Gregg	Weller	Chairman	11629 240th S	Brooten	MN	56316
Township	Pope	Bangor Township	Gerald	Vanderbeek	Clerk	13052 270th Street	Brooten	MN	56316
Township	Pope	New Prairie Township	Karla	Larson	Clerk	40612 State Hwy 28	Cyrus	MN	56323
Township	Pope	New Prairie Township	DeWayne	Larson	Chairman	21564 Co Rd 3	Cyrus	MN	56323
Township	Pope	Gilchrist Township	Joseph	White	Clerk	1309 Douglas St	Alexandria	MN	56308
Township	Pope	Gilchrist Township	John	Twedt	Chairman	30955 190th Ave	Glenwood	MN	56334
Township	Pope	Reno Township	Richard	Moen	Clerk	P.O. Box 7	Glenwood	MN	56337
Township	Pope	Reno Township	Keith	Hvezda	Chairman	11123 Co Rd 15	Lowry	MN	56349
Township	Pope	White Bear Lake Township	Andy	Aslagson	Clerk	PO Box 215	Starbuck	MN	56381
Township	Pope	White Bear Lake Township	Mike	Hoffmann	Chairman	32745 180th St	Starbuck	MN	56381
Township	Pope	Barsness Township	Tony	Douvier	Clerk	26657 245th Ave	Glenwood	MN	56334
Township	Pope	Barsness Township	Allen	Braaten	Chairman	26234 245th Ave	Glenwood	MN	56334
Township	Pope	Walden Township	Theresa	Fisher	Clerk	518 1st St.	Hancock	MN	56244
Township	Pope	Walden Township	Norman	Nissen	Chairman	24149 380th Ave SW	Hancock	MN	56244
Township	Pope	Hoff Township	Joanna	Rustad	Clerk	39956 Co Rd 2	Hancock	MN	56244
Township	Pope	Hoff Township	Ted	Kannegiesser	Chairman	36752 320th St	Clontarf	MN	56226
Township	Pope	Grove Lake Township	Jamie	Dietzmann	Clerk	10387 182nd St	Villard	MN	56385
Township	Pope	Grove Lake Township	Dan	Jasmer	Chairman	13385 Co Rd 22	Glenwood	MN	56334
Township	Pope	Westport Township	Nancy	Ahlfors	Clerk	P.O. Box 135	Villard	MN	56385
Township	Pope	Westport Township	Todd	Malecha	Chairman	14542 Co Rd 33	Villard	MN	56385
Township	Pope	Glenwood Township	David	Sibell	Clerk	19396 State Hwy 104	Glenwood	MN	56334
Township	Pope	Glenwood Township	Matthew	Laubach	Chairman	19668 200th St	Glenwood	MN	56334
Township	Pope	Blue Mounds Township	Terri	Mitchell	Clerk	26594 295th Ave	Starbuck	MN	56381
Township	Pope	Blue Mounds Township	Warren	Hagestuen	Chairman	26296 St Hwy 29 S	Starbuck	MN	56381
Township	Pope	Leven Township	Kathy	Tauber	Clerk	11775 176th Ave	Villard	MN	56385
Township	Pope	Leven Township	Patrick	Gaffaney	Chairman	20187 Co Rd 30	Glenwood	MN	56334
Township	Pope	Rolling Forks Township	Brian	Jergenson	Clerk	23039 310th Street	Glenwood	MN	56334
Township	Pope	Rolling Forks Township	Steve	Nelson	Chairman	25271 335th St	Starbuck	MN	56381
Township	Pope	Minnewaska Township	Dianne	Ronnie	Clerk	25807 Nordic Point Dr	Glenwood	MN	56334
Township	Pope	Minnewaska Township	Jill	Solomonson	Chairman	27885 N Shore Dr	Starbuck	MN	56381
Township	Pope	Langhei Township	Gary	Williams	Clerk	30539 27th Ave S	Starbuck	MN	56381
Township	Pope	Langhei Township	Eric	Danielson	Chairman	28191 Co Rd 10	Starbuck	MN	56381

Appendix C

Big Stone South – Alexandria – Big Oaks

345 kV Transmission Project

Certificate of Need Application

E002, E017, ET2, E015, ET10/CN-22-538

Type	County	Municipality/Township/State Electoral District	First	Last	Title	Address	City	State	Zip
Township	Pope	Ben Wade Township	Vernon	Hedlin	Clerk	33742 State Hwy 55	Farwell	MN	56327
Township	Pope	Ben Wade Township	Paul	Terhaar	Chairman	11749 300th Ave	Lowry	MN	56349
Township	Sherburne	Becker Township	Lucinda	Messman	Clerk	PO Box 248	Becker	MN	55308
Township	Sherburne	Becker Township	Brian	Kolbinger	Chairman	12165 Hancock St	Becker	MN	55308
Township	Stearns	Lynden Township	Jenny	Schmidt	Clerk	21367 County Road 44	Clearwater	MN	55320
Township	Stearns	Lynden Township	David	Johnson	Chairman	18378 County Road 145	Clearwater	MN	55320
Township	Stearns	Oak Township	Thomas	Roelike	Clerk	34993 County Road 172	Freeport	MN	56331
Township	Stearns	Oak Township	Pete	Welle	Chairman	28093 7th Street SW	Freeport	MN	56331
Township	Stearns	Farming Township	Judy	Bruemmer	Clerk	27555 County Road 41	Albany	MN	56307
Township	Stearns	Farming Township	Jaosn	Willenbring	Chairman	20104 275th Street	Richmond	MN	56368
Township	Stearns	Saint Martin Township	Donald	Rausch	Clerk	28422 County Road 177	Paynesville	MN	56362
Township	Stearns	Saint Martin Township	Kenneth	Utsch	Chairman	31161 Sauk Valley Road	Paynesville	MN	56362
Township	Stearns	Collegeville Township	Joe	Pohl	Clerk	27724 Co Rd 50	Cold Spring	MN	56320
Township	Stearns	Collegeville Township	Terry	Stein	Chairperson	27724 Co Rd 50	Cold Spring	MN	56320
Township	Stearns	Ashley Township	Jessica	Minette	Clerk	43250 433rd Avenue	Sauk Centre	MN	56378
Township	Stearns	Ashley Township	Bob	Ritter	Chairperson	45925 430th Street	Sauk Centre	MN	56378
Township	Stearns	Wakefield Township	Heidi	Stalboerger	Clerk	22295 Frostview Road	Cold Spring	MN	56320
Township	Stearns	Wakefield Township	Jerry	Frieler	Treasurer	22295 Frostview Road	Cold Spring	MN	56320
Township	Stearns	Wakefield Township	Shawn	Garding	Chairperson	16275 County Road 49	Cold Spring	MN	56320
Township	Stearns	Munson Township	Boni	Behnen	Clerk	24285 193rd Avenue	Richmond	MN	56368
Township	Stearns	Munson Township	Butch	Gertkin	Chairperson	20704 243rd Street	Richmond	MN	56368
Township	Stearns	Grove Township	Kris	Leukam	Clerk	34308 Overton Road	Melrose	MN	56352
Township	Stearns	Grove Township	Ron	Schaefer	Chairperson	33323 Oakshire Road	Melrose	MN	56352
Township	Stearns	Melrose Township	Cecilia	Tylutki	Clerk	32721 Birch Field Court	Melrose	MN	56352
Township	Stearns	Melrose Township	Jane	Salzi	Chairperson	42557 County Road 13	Melrose	MN	56352
Township	Stearns	Sauk Centre Township	Missy	Schirmers	Clerk	43216 400th Street	Sauk Centre	MN	56378
Township	Stearns	Sauk Centre Township	John	Bosl	Chairperson	38171 County Road 29	Sauk Centre	MN	56378
Township	Stearns	Saint Joseph Township	Anna	Reischl	Clerk	200 Hill St. W	St. Joseph	MN	56374
Township	Stearns	Saint Joseph Township	Doug	Fredrickson	Chairperson	26545 Jade Road	St. Cloud	MN	56301
Township	Stevens	Moore Township	Robert	Nohl	Clerk	29121 County Rd 1	Hancock	MN	56244
Township	Stevens	Moore Township	Brett	Duncan	Chairman	43752 290th St	Hancock	MN	56244
Township	Stevens	Swan Lake Township	Becky	Meyer	Clerk	40304 115th St	Kensington	MN	56343
Township	Stevens	Swan Lake Township	Geoff	Carlson	Chairman	45386 147th St	Morris	MN	56267
Township	Stevens	Hodges Township	Michele	Greiner	Clerk/Treasurer	40878 280th St	Hancock	MN	56244
Township	Stevens	Hodges Township	Royce	Anderson	Chairman	43646 250th St	Hancock	MN	56244
Township	Stevens	Framnas Township	Sharon	Ehlers	Clerk	18391 430th Ave	Morris	MN	56267
Township	Stevens	Framnas Township	Richard	Buro	Chairman	21411 Lake Ave	Morris	MN	56267
Township	Stevens	Horton Township	Lori	Kill	Clerk	51804 330th St	Morris	MN	56267
Township	Stevens	Horton Township	Wayne	Spohr	Chairman	33302 470th Ave	Hancock	MN	56244
Township	Stevens	Darnen Township	Dennis	Sleiter	Clerk	50495 250th St	Morris	MN	56267
Township	Stevens	Darnen Township	Jerry	Hentges	Chairman	23939 480th Ave	Morris	MN	56267
Township	Swift	Appleton Township	Sonya	Allpress	Clerk	2210 70th St. SW	Appleton	MN	56208
Township	Swift	Appleton Township	Gene	Meyer	Chairperson	2410 60th St SW	Appleton	MN	56208
Township	Swift	Fairfield Township	Denise	Mahoney	Clerk	1910 50th St. NW	Appleton	MN	56208
Township	Swift	Fairfield Township	Lawrence	Mahoney	Chairperson	1910 50th St. NW	Appleton	MN	56208
Township	Swift	Edison Township	Karen	Meyer	Clerk/Treasurer	223 S. Behl St.	Appleton	MN	56208
Township	Swift	Hegbert Township	Cherri	Banken	Clerk	2170 50th St. NW	Appleton	MN	56208
Township	Swift	Shible Township	Bonnie	Franklin	Clerk	340 190th Ave. SW	Appleton	MN	56208
Township	Swift	Shible Township	Ronald	Trager	Chairperson	170 200th Ave NW	Appleton	MN	56208
Township	Swift	West Bank Township	Linda	Styrbicky	Clerk	870 100th Ave. SW	Danvers	MN	56231
Township	Swift	Kildare Township	William	Bridgland	Clerk	345 65th Ave. SE	DeGraff	MN	56271
Township	Swift	Pillsbury Township	Lyle	Stai	Clerk	1185 160th Ave SE	Kerkhoven	MN	56252
Township	Swift	Tara Township	Patti	Buyck	Clerk	520 110th Ave. NW	Danvers	MN	56231
Township	Swift	Swenoda Township	Laurie	Golden	Clerk	660 110th St. SW	Danvers	MN	56231
Township	Swift	Dublin Township	Paula	Grace	Clerk/Treasurer	890 80th Ave. SE	DeGraff	MN	56271
Township	Swift	Torning Township	Roman	Kalthoff	Clerk	525 50th St. SE	DeGraff	MN	56271
Township	Swift	Benson Township	Grant	Herfindahl	Clerk	520 27th Ave. NE	Benson	MN	56215
Township	Swift	Camp Lake Township	Rebecca	Turnquist	Clerk	300 120th Ave. NE	Murdock	MN	56271
Township	Swift	Marysland Township	Cheryl	Beyer	Clerk	275 130th Ave. SW	Danvers	MN	56231
Township	Swift	Marysland Township	Jerome	McGeary	Chairperson	150 110th Ave SW	Danvers	MN	56231
Township	Swift	Moyer Township	James	Dehne	Clerk	217 Victoria Drive	Alexandria	MN	56308
Township	Swift	Kerkhoven Township	David	Barrett	Clerk	1445 70th St. NE	Murdock	MN	56271
Township	Swift	Hayes Township	Jean	Rood	Clerk	1455 20th St. NE	Murdock	MN	56271
Township	Swift	Six Mile Grove Township	Sara	Wersinger	Clerk	420 MN Ave.	Danvers	MN	56231
Township	Swift	Clontarf Township	Anne	Schirmer	Clerk	P.O. Box 347	Clontarf	MN	56271
Township	Swift	Cashel Township	Gail	Brehmer	Clerk	815 50th Ave SE	DeGraff	MN	56271
Township	Todd	West Union Township	John	Chalmers	Clerk	14622 Hwy 101	Big Stone South	MN	56301
Township	Todd	West Union Township	Earyl	Didier	Chairperson	15489 150th St	Osakis	MN	56360

Type	County	Municipality/Township/State Electoral District	First	Last	Title	Address	City	State	Zip
Township	Wright	Monticello Township	Cathy	Shuman	Clerk	8550 Edmonson Avenue NE	Monticello	MN	55362
Township	Wright	Monticello Township	Brett	Holker	Chairperson	8550 Edmonson Avenue NE	Monticello	MN	55362
Township	Wright	Clearwater Township	Jean	Just	Clerk	15015 State Hwy 24	Clearwater	MN	55320
Township	Wright	Clearwater Township	John	Notsch	Chairperson	15015 State Hwy 24	Clearwater	MN	55320
Township	Wright	Silver Creek Township	Heidi	Eckerman	Clerk/Treasurer	3827 134th ST NW	Monticello	MN	55362
Township	Wright	Silver Creek Township	Chris	Newman	Chairperson	3827 134th ST NW	Monticello	MN	55362
County	Todd		Chris	Pelzer	County Coordinator	215 1st Ave S, Suite 300	Long Prairie	MN	56347
County	Grant		Kimberly	Sundbom-Trudeau	County Coordinator	10 2nd St. NE	Elbow Lake	MN	56531
County	Douglas		Heather	Schlangen	County Coordinator	821 Cedar Street	Alexandria	MN	56308
County	Stevens		Rebecca	Young	County Administrator	400 Colorado Ave, Suite 302	Morris	MN	56267
County	Stearns		Michael	Williams	County Administrator	705 Courthouse Square, Room 121	St. Cloud	MN	56303-4701
County	Pope		Kersten	Kappmeyer	County Administrator	130 East Minnesota Avenue	Glenwood	MN	56334
County	Big Stone		Pam	Rud	County Coordinator	20 Second St SE	Ortonville	MN	56278
County	Sherburne		Bruce	Messelt	County Administrator	13880 Business Center Drive NW, Suite 100	Elk River	MN	55330-4668
County	Swift		Tesa	Tomaschett	County Administrator	301 14th Street North	Benson	MN	56125
County	Wright		Lee	Kelly	County Administrator	3650 Braddock Avenue NE Room 3200	Buffalo	MN	55313
County	Lac Qui Parle		Jake	Sieg	County Administrator	600 6th Street, Suite 6	Madison	MN	56256
Municipality		Alexandria	Bobbie	Osterberg	Mayor	704 Broadway	Alexandria	MN	56308
Municipality		Alexandria	Martin	Schultz	City Administrator	705 Broadway	Alexandria	MN	56309
Municipality		Alexandria Light & Power Utilities (ALP Utilities)	Ted	Cash	General Manager	316 Fillmore St	Alexandria	MN	56308
Municipality		Alexandria Light & Power Utilities (ALP Utilities)	Josh	Waldorf	Electric Manager	316 Fillmore St	Alexandria	MN	56308
Municipality		Becker	Tracy	Bertram	Mayor	12060 Sherburne Avenue	Becker	MN	55308
Municipality		Becker	Greg	Lerud	City Administrator	12061 Sherburne Avenue	Becker	MN	55309
Municipality		Benson	Jack	Evenson	Mayor	1410 Kansas Avenue	Benson	MN	56215
Municipality		Benson	Val	Alsker	City Administrator	1410 Kansas Avenue	Benson	MN	56215
Municipality		Benson	Rob	Wolffington	Acting City Manager	615 11th St S	Benson	MN	56215
Municipality		Benson Municipal Utilities	John	Goulet	Distribution Maintenance Crew Leader	1540 Kansas Ave	Benson	MN	56215
Municipality		Clearwater	Andrea	Lawrence-Wheeler	Mayor	PO Box 9	Clearwater	MN	55320
Municipality		Clearwater	Anita	Smythe	City Administrator	PO Box 9	Clearwater	MN	55320
Municipality		Clontarf	Thomas	Staton	Mayor	PO Box 307	Clontarf	MN	56226-0307
Municipality		Correll	Diane	Koepp	Mayor	109 Hwy 7 E Ste 100	Correll	MN	56227
Municipality		Cyrus	Tyler	Berg	Mayor	PO Box 36, 126 W. Main St	Cyrus	MN	56323
Municipality		Cyrus	Betsey	Alessi	City Clerk	PO Box 36, 126 W. Main St	Cyrus	MN	56323
Municipality		Danvers	Julie	Commerford	Mayor	PO Box 76	Danvers	MN	56231
Municipality		Danvers	Shari	Swanberg	City Clerk	PO Box 76	Danvers	MN	56231
Municipality		De Graff	Randy	Simmonds	Mayor	405 5th Street South	De Graff	MN	56271-9097
Municipality		Farwell	Curt	Huizinga	Mayor	PO Box 12A	Farwell	MN	56327
Municipality		Farwell	Jannel	Brockopp	City Clerk	PO Box 12A	Farwell	MN	56327
Municipality		Forada	Bob	Verkinderen	Mayor	10991 Toby's Ave SE	Alexandria	MN	56308
Municipality		Forada	David	Reller	City Clerk/Treasurer	10991 Toby's Ave SE	Alexandria	MN	56308
Municipality		Freeport	Mike	Eveslage	Mayor	PO Box 301	Freeport	MN	56331
Municipality		Freeport	Jon	Nelson	City Clerk	PO Box 301	Freeport	MN	56331
Municipality		Glenwood	Sherry	Kazda	Mayor	100 17th Avenue NW	Glenwood	MN	56334
Municipality		Glenwood	David	Iverson	City Administrator	100 17th Avenue NW	Glenwood	MN	56334
Municipality		Hancock	Bruce	Malo	Mayor	PO Box 68 662 6th ST	Hancock	MN	56244
Municipality		Hancock	Jodi	Bedel	City Clerk	PO Box 68 662 6th ST	Hancock	MN	56244
Municipality		Hoffman	Dennis	Satre	Mayor	PO Box 227	Hoffman	MN	56339-0227
Municipality		Hoffman	Janee	Strunk	City Clerk	PO Box 227	Hoffman	MN	56339-0227
Municipality		Holloway	Bradley	Oyen	Mayor	PO Box 108	Holloway	MN	56249
Municipality		Holloway	Joanna	Schliep	City Clerk	PO Box 108	Holloway	MN	56249
Municipality		Kensington	Jim	Schecker	Mayor	PO Box 156	Kensington	MN	56343
Municipality		Kensington	Jennifer	Kangas	City Clerk	PO Box 156	Kensington	MN	56343
Municipality		Long Beach	Mike	Pfeiffer	Mayor	23924 N. Lakeshore Drive	Glenwood	MN	56334
Municipality		Long Beach	Gerald	Rust	Assistant Mayor	23924 N. Lakeshore Drive	Glenwood	MN	56334
Municipality		Long Beach	Patia	Jensen	City Clerk	23924 N. Lakeshore Drive	Glenwood	MN	56334
Municipality		Lowry	Dan	Sutton	Mayor	PO Box 56	Lowry	MN	56349
Municipality		Lowry	Kristi	Kramber	City Clerk	PO Box 56	Lowry	MN	56349
Municipality		Melrose	Joe	Finken	Mayor	225 1st NE	Melrose	MN	56352
Municipality		Melrose	Colleen	Winter	City Administrator	225 1st NE	Melrose	MN	56352
Municipality		Melrose Public Utilities	Roger	Avelsgard	Electrical Supervisor	225 1st St NE	Melrose	MN	56352
Municipality		Monticello	Lloyd	Hilgart	Mayor	505 Walnut Street	Monticello	MN	55362
Municipality		Monticello	Rachel	Leonard	City Administrator	505 Walnut Street	Monticello	MN	55362
Municipality		Monticello	Jennifer	Schreiber	City Clerk	505 Walnut Street	Monticello	MN	55362
Municipality		Murdock	Craig	Cavanagh	Mayor	300 Frederick St	Murdock	MN	56271
Municipality		Murdock	Kimberly	Diederich	City Clerk	300 Frederick St	Murdock	MN	56271
Municipality		Odessa	Catherine	Teske	Mayor	PO Box 67	Odessa	MN	56276
Municipality		Ortonville	Gene	Hausauer	Mayor	751 Highway 135	Ortonville	MN	56278
Municipality		Ortonville	Char	Grossman	City Administrator	315 Madison Avenue	Ortonville	MN	56278

Appendix C

Big Stone South – Alexandria – Big Oaks

345 kV Transmission Project

Certificate of Need Application

E002, E017, ET2, E015, ET10/CN-22-538

Type	County	Municipality/Township/State Electoral District	First	Last	Title	Address	City	State	Zip
Municipality		Ortonville Municipal Utilities	Tom	Dew	Distribution Maintenance Crew Leader	315 Madison Ave	Ortonville	MN	56278
Municipality		Rockville	Duane	Willenbring	Mayor	PO Box 93	Rockville	MN	56369
Municipality		Saint Augusta	Mike	Zenzen	Mayor	2162 County Road 115	St Augusta	MN	56301
Municipality		Saint Augusta	Bill	McCabe	City Administrator	1914 250th Street	St Augusta	MN	56302
Municipality		Saint Cloud	Dave	Kleis	Mayor	1201 7th St. S.	St. Cloud	MN	56301
Municipality		Saint Cloud	Matthew	Staehling	City Administrator	1201 7th St. S.	St. Cloud	MN	56301
Municipality		Saint Cloud	Seth	Kauffman	City Clerk	1201 7th St. S.	St. Cloud	MN	56301
Municipality		Sedan	Keith	Kirchhevel	Mayor	241 Pope Ave	Sedan	MN	56334
Municipality		Sedan	Julie	Lloyd	City Clerk	241 Pope Ave	Sedan	MN	56334
Municipality		Starbuck	Gary	Swenson	Mayor	PO Box 606	Starbuck	MN	56381
Municipality		Starbuck	Joan	Kerkvliet	City Clerk	PO Box 606	Starbuck	MN	56381
Municipality		Villard	Jason	Rupp	Mayor	PO Box 7	Villard	MN	56385
Municipality		Villard	Ann	Butler	City Clerk	PO Box 7	Villard	MN	56385
Municipality		Waite Park	Richard	Miller	Mayor	PO Box 339	Waite Park	MN	56387
Municipality		Waite Park	Shauna	Johnson	City Administrator	PO Box 339	Waite Park	MN	56387
Municipality		Waite Park	Adri	Brenny	City Clerk	PO Box 339	Waite Park	MN	56387
Municipality		West Union	Roger	Engle	Mayor	PO Box 106	West Union	MN	56389
Municipality		West Union	Janet	Macey	City Clerk	PO Box 106	West Union	MN	56389
State		District 12	Torrey	Westrom	Senator	95 University Avenue W. Minnesota Senate Bldg., Room 2201	St. Paul	MN	55155
State		District 13	Jeff	Howe	Senator	95 University Avenue W. Minnesota Senate Bldg., Room 2231	St. Paul	MN	55155
State		District 14	Aric	Putnam	Senator	95 University Avenue W. Minnesota Senate Bldg., Room 3215	St. Paul	MN	55155
State		District 15	Gary	Dahms	Senator	95 University Avenue W. Minnesota Senate Bldg., Room 2219	St. Paul	MN	55155
State		District 27	Andrew	Mathews	Senator	95 University Avenue W. Minnesota Senate Bldg., Room 2233	St. Paul	MN	55155
State		District 29	Bruce	Anderson	Senator	95 University Avenue W. Minnesota Senate Bldg., Room 2209	St. Paul	MN	55155
State		District 5	Paul	Utke	Senator	95 University Avenue W. Minnesota Senate Bldg., Room 2403	St. Paul	MN	55155
State		District 9	Jordan	Rasmusson	Senator	95 University Avenue W. Minnesota Senate Bldg., Room 2409	St. Paul	MN	55155
State		District 12A	Paul	Anderson	Representative	100 Rev. Dr. Martin Luther King Jr. Blvd. Minnesota State Office Bldg., Room 277	St. Paul	MN	55155
State		District 12B	Mary	Franson	Representative	100 Rev. Dr. Martin Luther King Jr. Blvd. Minnesota State Office Bldg., Room 303	St. Paul	MN	55155
State		District 13A	Lisa	Demuth	Representative	100 Rev. Dr. Martin Luther King Jr. Blvd. Minnesota State Office Bldg., Room 267	St. Paul	MN	55155
State		District 14A	Bernie	Perryman	Representative	100 Rev. Dr. Martin Luther King Jr. Blvd. Minnesota State Office Bldg., Room 321	St. Paul	MN	55155
State		District 15A	Chris	Swedzinski	Representative	100 Rev. Dr. Martin Luther King Jr. Blvd. Minnesota State Office Bldg., Room 245	St. Paul	MN	55155
State		District 27A	Shane	Mekeland	Representative	100 Rev. Dr. Martin Luther King Jr. Blvd. Minnesota State Office Bldg., Room 215	St. Paul	MN	55155
State		District 29A	Joe	McDonald	Representative	100 Rev. Dr. Martin Luther King Jr. Blvd. Minnesota State Office Bldg., Room 241	St. Paul	MN	55155
State		District 29B	Marion	O'Neill	Representative	100 Rev. Dr. Martin Luther King Jr. Blvd. Minnesota State Office Bldg., Room 357	St. Paul	MN	55155
State		District 5B	Mike	Wiener	Representative	100 Rev. Dr. Martin Luther King Jr. Blvd. Minnesota State Office Bldg., Room 327	St. Paul	MN	55155
State		District 9A	Jeff	Backer	Representative	100 Rev. Dr. Martin Luther King Jr. Blvd. Minnesota State Office Bldg., Room 369	St. Paul	MN	55155
State		District 9B	Tom	Murphy	Representative	100 Rev. Dr. Martin Luther King Jr. Blvd. Minnesota State Office Bldg., Room 313	St. Paul	MN	55155
Tribe		Bad River Band of the Lake Superior Tribe of Chippewa Indians of the Bad River Reservation, Wisconsin	Lawrence	Plucinski	Deputy Tribal Historic Preservation Officer	PO Box 39	Odanah	WI	54861
Tribe		Cheyenne and Arapaho Tribes, Oklahoma	Max	Bear	Tribal Historic Preservation Officer	700 Black Kettle Blvd	Concho	OK	73022
Tribe		Flandreau Santee Sioux Tribe of South Dakota	Garrie	Kills A Hundred	Tribal Historic Preservation Officer	PO Box 283	Flandreau	SD	57028
Tribe		Fond du Lac Band of the Minnesota Chippewa Tribe	Evan	Schroeder	Tribal Historic Preservation Officer	1720 Big Lake Rd	Cloquet	MN	55720
Tribe		Fort Belknap Indian Community of the Fort Belknap Reservation of Montana	Michael	Blackwolf	Tribal Historic Preservation Officer	656 Agency Main Street	Harlem	MT	59526-9455
Tribe		Grand Portage Band of the Minnesota Chippewa Tribe	Rob	Hull	Tribal Historic Preservation Officer	PO Box 428	Grand Portage	MN	55605
Tribe		Iowa Tribe of Kansas and Nebraska	Lance	Foster	Tribal Historic Preservation Officer	3345 B Thrasher Rd.	White Cloud	KS	66091
Tribe		Keweenaw Bay Indian Community, Michigan	Alden	Connor	Tribal Historic Preservation Officer	16429 Beartown Rd.	Baraga	MI	49908
Tribe		Lac Vieux Desert Band of Lake Superior Chippewa Indians of Michigan	Alina	Shively	Tribal Historic Preservation Officer	E23709 9th St. W.	Big Stone South	WI	53001
Tribe		Lower Sioux Indian Community in the State of Minnesota	Cheyenne	St. John	Tribal Historic Preservation Officer	PO Box 308	Morton	MN	56270

Type	County	Municipality/Township/State Electoral District	First	Last	Title	Address	City	State	Zip
Tribe		Mille Lacs Band of Ojibwe (The Mille Lacs Band of the Minnesota Chippewa Tribe Mille Lacs Band of Ojibwe)	Terry	Kemper	Tribal Historic Preservation Officer	43408 Oodena Drive	Onamia	MN	56359
Tribe		Minnesota Chippewa Tribe	Rob	Hull	Tribal Historic Preservation Officer	P.O. Box 428	Grand Portage	MN	55605
Tribe		Prairie Island Indian Community in the State of Minnesota	Noah	White	Tribal Historic Preservation Officer	5636 Sturgeon Lake Road	Welch	MN	55089
Tribe		Red Cliff Band of Lake Superior Chippewa Indians of Wisconsin	Marvin	DeFoe	Tribal Historic Preservation Officer	88455 Pike Road	Bayfield	WI	54814
Tribe		Santee Sioux Nation, Nebraska	Misty	Frazier	Tribal Historic Preservation Officer	425 Frazier Ave. N. Suite 2	Niobrara	NE	68760
Tribe		Sisseton-Wahpeton Oyate of the Lake Traverse Reservation, South Dakota	Dianne	Desrosiers	Tribal Historic Preservation Officer	12554 BIA HWY 711, PO Box 907	Agency Village	SD	57262
Tribe		Spirit Lake Tribe, North Dakota	Kenneth	Graywater	Tribal Historic Preservation Officer	P.O. Box 359	Fort Totten	ND	58335-0359
Tribe		Upper Sioux Community, Minnesota	Samantha	Odegard	Tribal Historic Preservation Officer	PO Box 147	Granite Falls	MN	56241-0147
Tribe		White Earth Band of the Minnesota Chippewa Tribe	Jaime	Arsenault	Tribal Historic Preservation Officer	PO Box 418	White Earth	MN	56591
Tribe		Apache Tribe of Oklahoma	Durrell	Cooper	Chairman	PO Box 1330	Anadarko	OK	73005
Tribe		Lac du Flambeau Band of Lake Superior Chippewa Indians of the Lac du Flambeau Reservation of Wisconsin	Sarah	Thompson	Tribal Historic Preservation Officer	PO Box 67	Lac du Flambeau	WI	54538
Tribe		Leech Lake Band of the Minnesota Chippewa Tribe	Amy	Burnette	Tribal Historic Preservation Officer	190 Sailstar Drive NE	Cass Lake	MN	56633
Tribe		Menominee Indian Tribe of Wisconsin	David	Grignon	Tribal Historic Preservation Officer	PO Box 910	Keshena	WI	54135-0910
Tribe		Sokaogon Chippewa Community, Wisconsin	Michael	Laronge	Tribal Historic Preservation Officer	3051 Sand Lake Road	Crandon	WI	54520
Tribe		Bois Forte Band of Chippewa	Jaylen	Strong	Tribal Historic Preservation Officer	1500 Bois Forte Road	Tower	MN	55790
Tribe		Red Lake Band of Chippewa Indians	Kade	Ferris	Tribal Historic Preservation Officer	PO Box 274	Red Lake	MN	56671
Tribe		Shakopee Mdewakanton Sioux Community	Leonard	Wabasha	Tribal Historic Preservation Officer	2330 Sioux Trail NW	Prior Lake	MN	55372
Tribe		Minnesota Indian Affairs Council	Shannon	Geshick	Executive Director	161 St. Anthony Ave, Ste 919	St. Paul	MN	55103
Tribe		Mille Lacs Band of Ojibwe (The Mille Lacs Band of the Minnesota Chippewa Tribe Mille Lacs Band of Ojibwe)	Charlie	Lippert	Air Quality Specialist	43408 Oodena Drive	Onamia	MN	56359

Proposed Public Notice

Big Stone South-Alexandria-Big Oaks newspaper notice draft

Public Notice

RE: Notice of Certificate of Need Application for the Big Stone South – Alexandria – Big Oaks Transmission Project

MPUC Docket No. E002, E017, ET2, E015, ET10/CN-22-538

This notice is intended to inform you of a proposed transmission line project and to:

1. Outline general Project location and a description of the need for the Project;
2. Describe how you can participate in the regulatory process; and
3. Provide contact information to receive additional information and to sign up for email and mailing lists.

Northern States Power Company, doing business as Xcel Energy (Xcel Energy), along with Great River Energy, Minnesota Power, Otter Tail Power Company (Otter Tail), and Missouri River Energy Services on behalf of Western Minnesota Municipal Power Agency (Western Minnesota) (collectively, the Applicants) are proposing to construct a new 345 kV transmission line between Big Stone City, South Dakota, and Sherburne County, Minnesota, which will be comprised of two segments (collectively referred to as the Project):

- The western segment will run from the existing Big Stone South Substation near Big Stone City, South Dakota to the existing Alexandria Substation near Alexandria, Minnesota (Western Segment); and
- The eastern segment will continue on from the existing Alexandria Substation to a new Big Oaks Substation in Sherburne County, Minnesota (Eastern Segment).

The majority of the Eastern Segment of the Project will include adding a second set of wires that will be strung on existing transmission line structures except for a short one-to four-mile segment of new construction to connect the new 345 kV transmission line to the new Big Oaks Substation. Proposed routes for the Western Segment of the Project are currently under evaluation by Otter Tail and Missouri River Energy Services, on behalf of Western Minnesota.

We are publishing this notice to inform those in the Notice Area, including:

- Landowners who own property in the area;
- Residents who live in the area;
- Local government units in the area;

- State elected officials; and
- Government agencies and offices.

Please see the Notice Area map for detail on where the Project may be located.

Why is the Project needed?

The Project is a key part of a portfolio of new transmission projects that is necessary to maintain a reliable, safe, and affordable transmission system in the Upper Midwest.

The existing 230 kV transmission system in eastern North Dakota and South Dakota plays a key role in transporting and delivering energy into Minnesota. The 230 kV system is at its capacity leading to a number of reliability concerns that could affect customers' service. The Project is needed to provide additional transmission capacity, to mitigate current capacity issues, and to improve electric system reliability throughout the region as more renewable energy resources are added to the electric system in and around the region.

What is the regulatory process for the Project?

Before construction can begin on the Project, the Minnesota Public Utilities Commission (the Commission) must determine whether the Project is needed in a Certificate of Need proceeding. If the Commission determines the Project is needed, it will then determine where the Project should be constructed through a Route Permit proceeding.

The Certificate of Need process is governed by Minnesota law, including Minnesota Statutes Section 216B.243, and Minnesota Rules Chapter 7829 and 7849, specifically, Rules 7849.0010 to 7849.0400 and 7849.1000 to 7849.2100. A copy of the Certificate of Need application, once submitted, can be obtained by visiting the Commission's website at www.mn.gov/puc/ in Docket No. E002, E017, ET2, E015, ET10/CN-22-538.

As part of the Certificate of Need process, the Minnesota Department of Commerce, Energy Environmental Review and Analysis (EERA) will prepare an environmental report as required by Minnesota Rule 7849.1200.

As noted, the Commission must also grant a Route Permit for the Project before it can be built. The routing of the Minnesota portion of the Project is governed by Minnesota law, including Minnesota Statutes Chapter 216E and Minnesota Rules Chapter 7850.

The Commission will not make these determinations until it has completed a thorough process that encourages public involvement and analyzes the impacts of the Project. The table below provides a high-level summary of the major steps in the Certificate of Need process.

Major Certificate of Need Process Steps and Summary Schedule

Step	Approximate Date
Pre-Application public meetings and stakeholder outreach	Second Quarter 2023
Certificate of Need Application submitted to Commission	Third Quarter 2023
Informational Meetings (public meeting and comment)	Fourth Quarter 2023
Environmental Report Issued	Fourth Quarter 2023/ First Quarter 2024
Public Hearings (public meeting and comment period)	First Quarter 2024/ Second Quarter 2024
Commission Decision	Second Quarter 2024/ Third Quarter 2024

How will the regulatory process be structured?

The Applicants intend to file a Certificate of Need Application for the entire Minnesota portion of the Project and two separate Route Permit applications—one for the Western Segment and one for the Eastern Segment.

Although all Applicants will participate in the regulatory process, Xcel Energy is leading the Certificate of Need application on behalf of the Applicants for the Minnesota portion of the Project and the Route Permit application for the Eastern Segment. With the exception of a short one-to four-mile 345 kV line near the new Big Oaks Substation, the Eastern Segment of the Project involves adding a second set of wires to the existing structures.

Otter Tail is leading the Route Permit application for the Western Segment on behalf of itself and Western Minnesota. Otter Tail and Missouri River Energy Services, on behalf of Western Minnesota, are assessing route alternatives for the Western Segment between the Big Stone South Substation in South Dakota and the Alexandria Substation in Minnesota by identifying opportunities and constraints, conducting stakeholder outreach, engaging applicable governmental and regulatory agencies, and developing engineering, design and construction information. Otter Tail and Western Minnesota will also file the Route Permit application in South Dakota, along with any other applicable permits required within South Dakota, for the portion of the Western Segment that will be located in South Dakota.

How will the utilities acquire right-of-way necessary for the Project?

Before beginning construction, the utilities will acquire property rights for the right-of-way, typically through an easement that will be negotiated with the landowner for each parcel. The typical right-of-way for a transmission line operated at 345 kV is 150-feet wide. Except for a short one-to four-mile segment, the Eastern Segment of the Project

involves adding a second set of wires to existing structures so new right-of-way is not anticipated to be needed for the majority of the Eastern Segment of the Project.

How can I obtain additional information about the Project?

To subscribe to the Project’s Certificate of Need docket and to receive email notifications when information is filed in that docket, please visit www.edockets.state.mn.us, click on the “Subscribe to a Docket” button, enter your email address and select “Docket Number” from the Type of Subscriptions dropdown box, then select “22” from the first Docket number drop down box and enter “538” in the second box before clicking on the “Add to List” button. You must then click the “Save” button at the bottom of the page to confirm your subscription to the Project’s Certificate of Need docket.

To be placed on the Project Certificate of Need mailing list (MPUC Docket ET6675/CN-22-538), mail, fax, or email Robin Benson at Minnesota Public Utilities Commission, 121 7th Place E., Suite 350, St. Paul, MN 55101-2147, Fax: 651-297-7073 or robin.benson@state.mn.us. If you have questions about the state regulatory process, you may contact the Minnesota state regulatory staff listed below:

Minnesota Public Utilities Commission

[Commission contact to be added]

121 7th Place East, Suite 350

St. Paul, Minnesota 55101

651-296-0406

800-657-3782

Email: *[email to be added]*

Website: www.mn.gov/puc/

Minnesota Department of Commerce EERA

[DOC-EERA contact to be added]

85 7th Place East, Suite 280

St. Paul, Minnesota 55101

651-296-1500

800-657-3602

Email: *[email to be added]*

Website: www.mn.gov/commerce

Please visit the Project websites at: www.BigStoneSouthtoAlexandria.com (for the Western Segment) and www.AlexandriatoBigOaks.com (for the Eastern Segment) for more information and to learn more about our upcoming informational meetings for the public. Phone numbers and e-mail addresses for the Project are as follows:

Western Segment of the Project:

Project Phone Number: 1-800-598-5587

Project e-mail address: connect@bigstonesouthtoalexandria.com

Eastern Segment of the Project:

Project Phone Numbers: 1-888-231-7068

Project e-mail addresses: AlexandriatoBigOaks@XcelEnergy.com

How do I learn more about other transmission projects and the transmission planning process in Minnesota?

Minnesota Statutes § 216B.2425 require that each electric transmission-owning utility in the state file a biennial transmission planning report with the Commission by November 1st of each odd-numbered year. These reports provide information on the transmission planning process used by utilities in the state of Minnesota and information about other transmission line projects. The 2021 Biennial Transmission Planning Report is available at: www.minnelectrans.com.

Appendix D

Commission Order on Exemption Request and Notice Plan

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben
Valerie Means
Matthew Schuerger
Joseph K. Sullivan
John A. Tuma

Chair
Commissioner
Commissioner
Commissioner
Commissioner

In the Matter of the Application for a Certificate of Need for the Big Stone South – Alexandria – Big Oaks Transmission Project

SERVICE DATE: April 19, 2023

DOCKET NO. E-017, ET-2, E-002,
ET-10, E-015/CN-22-538

The above entitled matter has been considered by the Commission and the following disposition made:

- 1. Approved the Notice Plan Petition.**
- 2. Approved a variance to require the notice plan be implemented no more than 60 days and no less than one week prior to the filing of the Certificate of Need Petition.**
- 3. Approved the Request for Exemption from Certain Certificate of Need Application Content Requirements.**

This decision is issued by the Commission’s consent calendar subcommittee, under a delegation of authority granted under Minn. Stat. § 216A.03, subd. 8 (a). Unless a party, a participant, or a Commissioner files an objection to this decision within ten days of receiving it, it will become the Order of the full Commission under Minn. Stat. § 216A.03, subd. 8 (b).



The Commission agrees with and adopts the recommendations of the Department of Commerce, which are attached and hereby incorporated into the Order.

BY ORDER OF THE COMMISSION



Will Seuffert
Executive Secretary

To request this document in another format such as large print or audio, call 651.296.0406 (voice). Persons with a hearing or speech impairment may call using their preferred Telecommunications Relay Service or email consumer.puc@state.mn.us for assistance.

March 30, 2023

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. Docket No. E002, E017, ET2, E015, ET10/CN-22-538

Dear Mr. Seuffert:

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

Application for a Certificate of Need for the Big Stone South—Alexandria—Big Oaks
Transmission Project.

The Petition was filed on March 10, 2023 by:

Bria E. Shea
Regional Vice President, Regulatory Policy
Northern States Power Company
414 Nicollet Mall
Minneapolis, MN 55401

The Department recommends **approval with a condition** and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ STEVE RAKOW
Analyst Coordinator

SR/ja
Attachment

85 7th Place East - Suite 280 - Saint Paul, MN 55101 | P: 651-539-1500 | F: 651-539-1547
mn.gov/commerce
An equal opportunity employer

Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E002, E017, ET2, E015, ET10/CN-22-538

I. INTRODUCTION

On March 10, 2023 Northern States Power Company, doing business as Xcel Energy, along with Great River Energy, Minnesota Power, Otter Tail Power Company, and Western Minnesota Municipal Power Agency (collectively, the Applicants) submitted their *Notice Plan Petition* (Petition). The Petition provided the Applicants' proposal to provide notice to all persons reasonably likely to be affected by the Minnesota portion of the Big Stone South – Alexandria – Big Oaks 345 kilovolt (kV) transmission line project (the Project).

Also on March 10, 2023 the Applicants filed their *Request for Exemption from Certain Certificate of Need Application Content Requirements*.

Below are the comments of the Minnesota Department of Commerce (Department) regarding the Petition.

II. DEPARTMENT ANALYSIS

A. GOVERNING STATUTES AND RULES

The Applicants filed the Petition pursuant to Minnesota Rules, part 7829.2550 subpart 1 which states, in part “Three months before filing a certificate of need application for a high-voltage transmission line as defined by Minnesota Statutes, section 216B.2421, the applicant shall file a proposed plan for providing notice to all persons reasonably likely to be affected by the proposed line.”

Minnesota Statutes § 216B.2421 includes in its definition of a Large Energy Facility (LEF) “any high-voltage transmission line with a capacity of 200 kilovolts or more and greater than 1,500 feet in length.” Given that the proposed Project is a 345 kV transmission line substantially longer than 1,500 feet, the proposed Project falls within the definition of “large energy facility” and, therefore, requires a notice plan.

B. TYPES OF NOTICE

Minnesota Rules, part 7829.2550, subpart 3, requires types of notice as follows:

- direct mail notice, based on county tax assessment rolls, to landowners reasonably likely to be affected by the proposed transmission line;

- direct mail notice to all mailing addresses within the area reasonably likely to be affected by the proposed transmission line;
- direct mail notice to tribal governments and to the governments of towns, statutory cities, home rule charter cities, and counties whose jurisdictions are reasonably likely to be affected by the proposed transmission line; and
- newspaper notice to members of the public in areas reasonably likely to be affected by the proposed transmission line.

The Applicants proposed to provide notice to the area shown in Figure 1 of Attachment A of the Petition. The potential routes within the notice plan area are not identified at this time. Instead, the Notice Petition describes an overall Notice Area with three different subparts:

- The Notice Area for the Western Segment, between the South Dakota border and the Alexandria Substation, is a wide area as potential routes for the new 345 kV transmission line for this portion of the Project are in development.
- The Notice Area for the Eastern Segment, between the Alexandria Substation and the Big Oaks Substation, is narrower as the majority of the Eastern Segment will involve stringing a second 345 kV circuit on existing transmission line structures.
- The Notice Area near the new Big Oaks Substation along the Eastern Segment is slightly wider to accommodate the development of route alternatives to connect the new 345 kV transmission line to this new substation.

The list of individuals and entities to be provided notice are as follows:

- Regarding landowner notice—the Applicants will compile landowner names and addresses within the Notice Area using tax records.
- Regarding notice to mailing addresses—the Applicants will obtain a list of mailing addresses in the Notice Area and remove addresses common to the landowner list.
- Regarding notice to governmental jurisdictions—the Applicants will compile a list of lead administrative personnel in the towns, cities, home rule charter cities, and counties within the Notice Area. In addition, the Applicants will provide notice to the elected officials of those local units of government and to those State Senators and State Representatives whose districts are within the Notice Area.¹
- Regarding notice to tribal governments—A list of tribal governments and tribal government officials that will receive notice is included in Attachment B of the Petition.
- Regarding newspaper notice—The Applicants propose to place notice advertisements in the newspapers listed in Table 1 of the Petition.

¹ A complete list of government recipients is included in Attachment B of the Petition.

After reviewing the data in Figure 1 of Attachment A and Attachment B of the Petition, the Department concludes that the Applicants' proposed identification of individuals and organizations that should receive notice is reasonable

C. CONTENT OF NOTICE

Minnesota Rules, part 7829.2550, subpart 4 require the notices to provide the following information:

- a map showing the end points of the line and existing transmission facilities in the area;
- a description of general right-of-way requirements for a line of the size and voltage proposed and a statement that the applicant intends to acquire property rights for the right-of-way that the proposed line will require;
- a notice that the line cannot be constructed unless the Commission certifies that it is needed;
- the Commission's mailing address, telephone number, and website;
- if the applicant is a utility subject to chapter 7848, the address of the website on which the utility applicant will post or has posted its biennial transmission projects report required under that chapter;
- a statement that the Environmental Quality Board² will be preparing an environmental report on each high-voltage transmission line for which certification is requested;
- a brief explanation of how to get on the mailing list for the Environmental Quality Board's proceeding; and
- a statement that requests for certification of high-voltage transmission lines are governed by Minnesota law, including specifically chapter 4410, parts 7849.0010 to 7849.0400, and 7849.1000 to 7849.2100, and Minnesota Statutes, section 216B.243.

The Department reviewed the notices, letters and maps provided by the Applicants and concludes that the proposal for the resident/landowner notice, governmental notice, and newspaper notice contains the required information.

D. NOTICE TIMING

Minnesota Rules, part 7829.2550, subpart 6, requires the applicant to implement the notice plan within 30 days of its approval by the Commission. The Applicants did not request any change to this timing requirement. To avoid substantial gap between when notice is provided and when the proceeding begins, the Department recommends that the Commission direct the notices identified in this notice plan to occur no more than 60 days and no less than one week prior to the filing of the certificate of need (CN) petition. The Commission has ordered a similar approach in several dockets.³

² This function has since been transferred to the Commission.

³ Examples include:

- November 3, 2006 in Docket No. E002, ET2, et al/CN-08-1115;
- November 29, 2007 in Docket No. E017, E015, ET6/CN-07-1222;

Minnesota Rules, part 7829.3200 governs such variance requests and establishes the following criteria:

1. enforcement of the rule would impose an excessive burden upon the applicant or others affected by the rule;
2. granting the variance would not adversely affect the public interest; and
3. granting the variance would not conflict with standards imposed by law.

The Department concludes that enforcement of the rule would burden all parties involved by creating the potential for substantial separation between the provision of notice and the start of the proceeding. Granting the variance would not adversely affect the public interest since the proposal would more closely tie the implementation of the notice plan to the beginning of the CN proceeding. The Department is not aware that the variance would conflict with standards imposed by law. Therefore, the Department recommends that the Commission approve a variance to require the notice plan be implemented no more than 60 days and no less than one week prior to the filing of the CN petition.

E. NEWSPAPER NOTIFICATION REQUIREMENTS

In addition to the newspaper notice discussed above, Minnesota Rules, part 7829.2500, subpart 5, requires the Applicants to publish newspaper notice of the CN filing in newspapers of general circulation throughout the state. The Applicants interpret this as requiring notice upon filing the CN and not prior to the CN. Therefore, the Applicants request a variance to Minnesota Rules, part 7829.2500, subpart 5 to remove the requirement to publish notice in a newspaper of general circulation throughout the state upon filing the CN petition.

All Applicants conclude that all three requirements are met.

1. The Applicants' proposal includes notice being published in a statewide newspaper. The rule would be an excessive burden on the Applicants because it would require an additional newspaper notice to be provided after the CN application is filed, which will be close in time to the newspaper notice provided as part of the proposed Notice Plan.
2. The public interest will not be adversely affected because notice of the Project in a statewide newspaper will be provided prior to the filing of the CN application as part of the implementation of the Notice Plan.

-
- November 12, 2008 in Docket No. E002/CN-08-992;
 - January 26, 2010 in Docket No. E002/CN-09-1390;
 - August 17, 2010 in Docket No. E002/CN-10-694;
 - February 4, 2013 in Docket No. E002/CN-12-1235;
 - December 8, 2014 in Docket No. E015/CN-14-787; and
 - January 30, 2015 in Docket No. E015/CN-14-853.

3. Granting the variance will not conflict with any legal standards as notice of the Project will still be provided in a statewide newspaper.

The Department agrees with the Applicants' analysis and recommends the variance be approved.

III. DEPARTMENT RECOMMENDATION

The Department recommends that the Commission approve the Notice Petition and direct the notices identified in the notice plan to occur no more than 60 days and no less than one week prior to the filing of the CN petition.

March 30, 2023

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E002, E017, ET2, E015, ET10/CN-22-538

Dear Mr. Seuffert:

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

Application for a Certificate of Need for the Big Stone South—Alexandria—Big Oaks
Transmission Project.

The Petition was filed on March 10, 2023 by:

Bria E. Shea
Regional Vice President, Regulatory Policy
Northern States Power Company
414 Nicollet Mall
Minneapolis, MN 55401

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

Sincerely,

/s/ STEVE RAKOW
Analyst Coordinator

SR/ja
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E002, E017, ET2, E015, ET10/CN-22-538

I. INTRODUCTION

On March 10, 2023 Northern States Power Company, doing business as Xcel Energy, along with Great River Energy, Minnesota Power, Otter Tail Power Company, and Western Minnesota Municipal Power Agency (collectively, the Applicants) submitted their *Request for Exemption from Certain Certificate of Need Application Content Requirements* (Petition). The Petition provided the Applicants proposal to obtain exemptions from certain data requirements of Minnesota Rules 7849.0010 to 7849.0400

Also on March 10, 2023 the Applicants filed their *Notice Plan Petition*.

On March 22, 2023 the Minnesota Public Utilities Commission (Commission) issued its *Notice of Comment Period on Request For Exemption from Certain Certificate of Need Filing Requirements* (Notice) indicating that the topic open for comment is should the Commission grant the exemptions to the certificate of need (CN) application content requirements.

Below are the comments of the Minnesota Department of Commerce (Department) regarding the Petition and the Notice.

II. DEPARTMENT ANALYSIS

A. GOVERNING STATUTES AND RULES

The Applicants filed the Petition pursuant to Minnesota Rules, part 7849.0200 subpart 6 which states, in part:

Before submitting an application, a person is exempted from any data requirement of parts 7849.0010 to 7849.0400 if the person (1) requests an exemption from specified rules, in writing to the commission, and (2) shows that the data requirement is unnecessary to determine the need for the proposed facility or may be satisfied by submitting another document. A request for exemption must be filed at least 45 days before submitting an application.

Based on this standard the Commission may grant exemptions when the data requirements are shown to be unnecessary to determine need or can be satisfied by submitting alternative information. In the

Petition the Applicants request to be exempted from certain data requirements of parts 7849.0010 to 7849.0400.

B. BACKGROUND

The Applicants propose to file a CN petition to construct a 345 kV transmission line running from the Big Stone South substation, to the Alexandria substation to the Big Oaks substation (Project). The proposed Project is divided into two sections:

- The western segment will run from the existing Big Stone South Substation near Big Stone City, South Dakota to the existing Alexandria Substation near Alexandria, Minnesota (Western Segment); and
- The eastern segment will continue on from the existing Alexandria Substation to a new Big Oaks Substation in Sherburne County, Minnesota (Eastern Segment).

The proposed Project will be considered in one CN petition but two routing petitions.

The proposed Project was studied, reviewed, and approved as part of the Long Range Transmission Planning (LRTP) Tranche 1 Portfolio by the Midcontinent Independent System Operator, Inc.'s (MISO) Board of Directors in July 2022 as part of the 2021 MISO Transmission Expansion Plan (MTEP21) report.

The Petition describes the LRTP Tranche 1 Portfolio as follows:

The LRTP Tranche 1 Portfolio will provide significant benefits to the Midwest subregion of the MISO footprint by facilitating more reliable, safe, and affordable energy delivery. The Project, designated as LRTP#2 in MTEP21, is a key part of the LRTP Tranche 1 Portfolio. More specifically, the existing 230 kV transmission system in eastern North Dakota and South Dakota plays a key role in transporting and delivering energy into Minnesota. The 230 kV system is at its capacity leading to a number of reliability concerns that could affect customers' service. The Project is needed to provide additional transmission capacity, to mitigate current capacity issues, and to improve electric system reliability throughout the region as more renewable energy resources are added to the electric system in and around the region.

C. REQUESTED EXEMPTIONS

The Petition requests exemptions from the following requirements:

- 7849.0260 subparts A (3) and C (6)—line-specific loss information;
- 7849.0270 subparts 1 to 6—specific forecasting and capacity information;
- 7849.0270 subpart 2 (E)—annual revenue requirements;

- 7849.0280 (B) through (I)—system capacity;
- 7849.0290—conservation;
- 7849.0300—consequences of delay; and
- 7849.0340—no facility alternative.

The Department examines each specific exemption request separately. The required criterion is whether the Applicants have shown that “the data requirement is unnecessary to determine the need for the proposed facility or may be satisfied by submitting another document” as discussed above.

D. ANALYSIS OF EXEMPTION REQUESTS

1. 7849.0260 subparts A (3) and C (6)

Minnesota Rules 7849.0260 subparts A (3) and C (6) require an applicant for a CN to provide estimated “losses under projected maximum loading and under projected average loading in the length of the transmission line and at the terminals or substations.” The Petition explains that “losses take place across the entire transmission system and is not isolated to a few transmission lines within the integrated regional electric grid.” The Applicants request an exemption from Minnesota Rules 7849.0260, subps. A(3) and C(6) and propose to provide system losses in lieu of line-specific losses required by the rules.

The Department agrees that line losses for the system are more relevant to the analysis than line losses for individual lines. Also, as indicated in the Petition the proposal is consistent with the approach previously approved by the Commission in several other transmission line CN dockets. Therefore, the Department recommends that the Commission grant the requested exemption to Minnesota Rules 7849.0260 subpart A (3) and C (6) with the provision of the proposed alternative data.

2. 7849.0270 subparts 1 to 6

Minnesota Rules 7849.0270 subparts 1 to 6 requires an applicant for a CN to provide detailed forecasting information. The Petition explains that the rules assume that transmission improvements under consideration are driven by growing demand for electricity and the transmission project is linked directly to a specific generator proposed to meet that forecasted need. In contrast, the Applicants state that the proposed Project is needed for multiple reasons including addressing thermal and voltage issues and to provide additional transmission capacity to integrate renewable generation in the region. The Applicants request an exemption from Minnesota Rules 7849.0270 subparts 1 to 6 and propose to provide information regarding the forecasts used by MISO and the Applicants to assess the need for the proposed Project.

The Department agrees that using information actually used by MISO and the Applicants is superior to using the information required by the rule. Therefore, the Department recommends that the

Commission grant the requested exemption to Minnesota Rules 7849.0270 subparts 1 to 6 with the provision of the proposed alternative data.

3. *7849.0270 subpart 2 (E)*

Minnesota Rules 7849.0270 subpart 2 (E) requires an applicant for a CN to provide the estimated annual revenue requirement per kilowatt hour for the system in current dollars. The Applicants request an exemption from this rule and instead propose to provide information regarding how the costs for LRTP projects are shared within the MISO footprint.

The Department agrees that providing information regarding how the costs for LRTP projects are actually allocated across the MISO footprint is superior to using the information required by the rule. Therefore, the Department recommends that the Commission grant the requested exemption to Minnesota Rules 7849.0270 subpart 2 (E) with the provision of the proposed alternative data.

4. *7849.0280 (B) through (I)*

Minnesota Rules 7849.0280 subps. (B) through (I) requires an applicant for a CN to provide information that describes the ability of its existing system to meet forecasted demand; in essence, load and capability information. The Applicants state that this information pertains to an examination of generation adequacy and does not address transmission planning considerations. Also, the Applicants state that the Commission has previously granted exemption requests from Minn. Rule 7849.0280, subps. (B) through (I) in several other transmission line CN dockets. Thus, the Applicants request a complete exemption from this rule.

The Department agrees with the Applicants that the Commission has previously granted exemption requests from Minnesota Rules 7849.0280, subps. (B) through (I) in several other transmission line CN dockets where, as here, the issue relates to transmission adequacy rather than generation adequacy. Therefore, the Department recommends that the Commission grant the requested exemption to Minnesota Rules 7849.0280, subps. (B) through (I).

5. *7849.0290*

Minnesota Rules 7849.0290 requires the applicant for a CN to provide conservation program information and quantification of the impact of conservation programs on forecast data. Instead of the required information the Applicants propose to provide:

- substitute information related either to their conservation programs or to the conservation programs that are available to their members serving load in Minnesota; and
- information regarding how conservation and energy efficiency was considered by MISO in its evaluation of the proposed Project.

The Department agrees that the proposed information, particularly how MISO considered energy efficiency, will better inform the record as to the need for the proposed Project than the required information. Therefore, the Department recommends that the Commission grant the requested exemption to Minnesota Rules 7849.0290 with the provision of the proposed alternative data.

6. *7849.0300*

Minnesota Rules 7849.0300 requires an applicant for a CN to provide detailed information regarding the consequences of delay on three specific statistically-based levels of demand and energy consumption. The Applicants state that “such a discussion is an important element of a determination of the need for new transmission infrastructure.” However, while the Applicants will evaluate the consequences of delay, the Applicants request a variance from the portions of these rules that require the examination to incorporate the three specific levels of demand.

The Department agrees with the Applicants that information on the consequences of delay tied to three specific statistically-based levels of demand and energy consumption is not likely to be a critical part of the analysis for the proposed Project and that a general discussion is appropriate. Therefore, the Department recommends that the Commission grant the requested exemption to Minnesota Rules 7849.0300 with the provision of the proposed alternative data.

7. *7849.0340*

Minnesota Rules 7849.0340 requires an applicant for a CN provide a discussion of the impact on existing generation and transmission facilities at the three levels of demand specified in part 7849.0300 for the no-build alternative. As with Minnesota Rules 7849.0300, the Applicants state that “such a discussion is an important element of a determination of the need for new transmission infrastructure.” However, while the Applicants will evaluate a no build alternative, the Applicants request a variance from the portions of these rules that require the examination to incorporate the three specific levels of demand.

The Department agrees with the Applicants that information on the consequences of a no-build alternative tied to three specific statistically-based levels of demand and energy consumption is not likely to be a critical part of the analysis for the proposed Project and that a general discussion is appropriate. Therefore, the Department recommends that the Commission grant the requested exemption to Minnesota Rules 7849.0340 with the provision of the proposed alternative data.

III. DEPARTMENT RECOMMENDATION

The Department recommends that the Commission approve the Petition.

April 4, 2023

—Via Electronic Filing—

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
350 Metro Square Building
121 Seventh Place East
St. Paul, MN 55101

Re: IN THE MATTER OF THE APPLICATION FOR A CERTIFICATE OF NEED FOR THE
BIG STONE SOUTH – ALEXANDRIA – BIG OAKS TRANSMISSION PROJECT
DOCKET NO. E002, E017, ET2, E015, ET10/CN-22-538

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, along with Great River Energy, Minnesota Power, Otter Tail Power Company, and Western Minnesota Municipal Power Agency (collectively, the Applicants) submit these reply comments concerning the Notice Plan and Exemption Request for the Big Stone South – Alexandria – Big Oaks 345 kilovolt (kV) Transmission Line Project (Project),¹ which were submitted in the above-referenced proceeding on March 10, 2023.

Notice Plan

The Department of Commerce, Division of Energy Resources (Department) submitted comments on March 30, 2023 regarding the Applicants' Notice Plan. The Department recommended approval of the Notice Plan with the modification that the notices identified in the Notice Plan occur no more than 60 days and no less than one week prior the filing of the Certificate of Need Application. The Applicants appreciate the Department's careful review of the Notice Plan and agree with the Department's recommendation.

Exemption Request

The Department also submitted comments on March 30th regarding the Applicants' Exemption Request and recommended that the Commission approve the

¹ The Cassie's Crossing Substation has been renamed the Big Oaks Substation. The Project is designated as LRTP#2 by the Midcontinent Independent System Operator, Inc. (MISO).

Mr. Will Seuffert
April 4, 2023
Page 2

requested exemptions from certain Certificate of Need application filing requirements. The Applicants again appreciate the Department's thorough review of the Exemption Request and agree with the Department's recommendation.

Please contact me at bria.e.shea@xcelenergy.com or 612-330-6064 if you have any questions regarding this filing.

Sincerely,

/s/ Bria E. Shea

BRIA E. SHEA
REGIONAL VICE PRESIDENT, REGULATORY POLICY

cc: Service List

April 6, 2023

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Supplemental Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E002, E017, ET2, E015, ET10/CN-22-538

Dear Mr. Seuffert:

Based upon the April 4, 2023 reply comments of Northern States Power Company, doing business as Xcel Energy the Minnesota Department of Commerce, Division of Energy Resources recommends that the Minnesota Public Utilities Commission approve the requested exemptions and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ STEVE RAKOW
Analyst Coordinator

SR/ar