

March 5, 2026

Minnesota House of Representatives  
Committee on Energy Finance and Policy  
Capitol 123  
Saint Paul, MN 55155

RE: House File 3802 - Certificate of Need Exemption

Dear Chair Swedzinski, Chair Acomb, and Committee Members,

On behalf of Clean Energy Economy MN (CEEM), we write in support of House File 3802, a narrowly tailored exemption from the certificate of need (CON) requirement for certain transmission line upgrades or rebuilding projects.

CEEM is an industry-led, nonpartisan nonprofit representing the business voice of energy efficiency and advanced energy companies in Minnesota. Our more than 70 member companies employ tens of thousands of Minnesotans and are committed to policies that support reliability, affordability, and economic growth.

HF 3802 recognizes that upgrading existing 34.5 kV and 69 kV lines to 115 kV, often within the same right-of-way and with similar structures, is fundamentally different from building a new high-voltage transmission line on a new corridor. As demand grows, particularly in Greater Minnesota, these upgrades are essential to maintaining reliability and supporting local economic development.

Requiring the full CON process for these limited, in-corridor upgrades can create unnecessary delay and cost without providing additional value. This bill maintains routing and siting requirements while streamlining review for projects with minimal additional impacts.

We appreciate that the language has been refined in consultation with stakeholders to ensure the exemption is appropriately narrow and clearly defined. HF 3802 strikes a thoughtful balance between oversight and efficiency and will help ensure Minnesota's grid can keep pace with growing demand.

We thank Representative Hollins for bringing this bill forward and urge the committee to support it.

Sincerely,



George Damian  
Director of Government Affairs  
gdamian@cleanenergyeconomymn.org



March 5, 2026

Chair Chris Swedzinski, Chair Patty Acomb  
Minnesota House of Representatives Energy, Finance, and Policy Committee  
Centennial Office Building  
658 Cedar Street, St. Paul, MN 55155

**RE: HF 3802 (Hollins)**

Chair Swedzinski, Chair Acomb and Committee Members,

On behalf of the Minnesota Conservative Energy Forum (MnCEF), I am writing to express our support of HF 3802. Our organization champions secure, reliable, affordable, clean American energy, through an all-of-the-above approach grounded in principles of consumer choice, free markets, and innovation across Minnesota.

HF 3802 adds a targeted, commonsense exemption to the Certificate of Need (CON) process. Specifically, it would allow existing electric lines operating below 100 kilovolts to be upgraded or rebuilt to 115 kilovolt high-voltage transmission lines without requiring a full CON review, provided the project primarily uses existing rights-of-way. This is a narrow, practical reform that reduces unnecessary regulatory delay while maintaining the integrity of existing transmission corridors.

Minnesota's grid infrastructure is aging, and demand is growing. Whether it is manufacturing, data centers, or the electrification of vehicles and heating systems, the state needs a transmission system that can keep pace. Requiring a lengthy CON process for incremental upgrades on existing corridors creates bottlenecks that delay reliability improvements and increase costs for ratepayers. This bill removes that barrier for a category of projects that are low-impact by nature—using land already dedicated to transmission—while preserving the full CON review for more significant undertakings.

This is exactly the kind of continued permitting reform Minnesota needs. Across the country, there is growing bipartisan recognition that outdated regulatory processes are holding back the infrastructure investments our grid demands. HF 3802 demonstrates that effective permitting reform does not require sweeping overhauls—targeted, commonsense adjustments that match the scale of review to the scale of the project can deliver real results for ratepayers and utilities alike.

MnCEF encourages you to support HF 3802. This legislation takes a practical step toward modernizing Minnesota's grid by removing regulatory barriers to common-sense transmission upgrades, strengthening reliability and reducing costs for all Minnesotans. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Rachel E. Stuckey".

Rachel Stuckey  
Executive Director  
Minnesota Conservative Energy Forum