



Murray County Board of Commissioners
2848 Broadway Ave. PO Box 57
Slayton, MN 56172

February 20, 2024

Via Electronic Filing

Minnesota Public Utilities Commission
121 7th Place E, Suite 350
St. Paul, MN 55101

**Re: In the Matter of the 2023 Minnesota Biennial Transmission Projects Report
PUC Docket: E999/M-23-91**

Dear Commissioners,

On November 1, 2023, the Minnesota Transmission Owners (TO's) filed its 2023 Biennial Transmission Planning Report (Report) with the Minnesota Public Utilities Commission (PUC).

Murray County, located in the southwest corner of the state, was one of the first counties to have wind turbines erected within its jurisdictional boundaries. As such, our County is concerned that the Report does not fully address the continuing decline in tax revenue from the increasing curtailment of energy production. Two wind farms within Murray County have seen substantial curtailments since 2019; Fenton Wind Farm (Fenton): 3% in 2019 to 48% in 2023; and Stoneray Wind Farm (Stoneray): 2% in 2019 to 15% in 2023.

According to Information Request No. 4, of Docket No. E999/M-21-111; E999/M-23-91, MTO utilities, including Xcel Energy, were to have completed "numerous actions in recent years to alleviate congestion in Southwest Minnesota in an effort to limit curtailment of wind resources in this area." Listed in the document were eight substation Xcel Congestion Projects that were to be completed between August 1, 2022 and March 1, 2023. Why, if those projects were identified to address curtailment in southwest Minnesota, was there still an increase in curtailment in the Fenton from 42% (2022) to 48% (2023) and in the Stoneray from 2% (2022) to 15% (2023), see enclosed Murray County and Murray County Townships Financial Impact Table.

Murray County does not believe that this deficiency in the Report rises to the level of rejecting the Report as incomplete under Minnesota Rule 7848.1300. Rather, since the PUC has been aware of the congestion and curtailment issues present, and the Report does not provide an extensive description and analysis, it is our recommendation that the PUC request additional, specific information related to curtailment problems and solutions present in southwest Minnesota.

District 1
Molly Malone

District 2
Lori Gunnink

District 3
Dennis Welgraven

District 4
Jackie Meier

District 5
David Thiner

Murray County recommends that the PUC condition any approval of the Report by requiring the TO's to provide a supplementary filing in this docket describing:

- The extent that projects described or proposed in the Report will improve historic or future congestion and curtailment in southwest Minnesota.
- The root causes of the stability, thermal or other issues present in southwestern Minnesota with emphasis on those impacting currently installed wind capacity.
- MISO regional studies, local TO studies characterizing this issue and describe any potential solutions to these stability issues.
- Require the TO's to include in the supplemental filing a plan to resolve the stability issues present in southwest Minnesota. The plan should include timeline for study work needed, local or MISO approval processes, description of new transmission facilities required to resolve these issues, estimated capital costs and potential Commercial Operations Date (COD).

Alternately, the PUC could open a Commission initiated docket to develop a record on transmission curtailment matters, drivers and potential solutions, outside of the Biennial process.

Murray County appreciates the Commission's attention to these important issues and looks forward to finding solutions which improve the reliability of Minnesota's transmission system, while providing full outlet capacity in southwest Minnesota.

Sincerely,



Jackie Meier
Murray County Board Chair

Enclosure: Murray County and Murray County Townships Financial Impact Table

CC: Senator Bill Weber
Representative Joe Schomacker



Murray County Board of Commissioners
 2848 Broadway Ave. PO Box 57
 Slayton, MN 56172

MURRAY COUNTY AND MURRAY COUNTY TOWNSHIPS FINANCIAL IMPACT TABLE

		2019	2020	2021	2022	2023	2024
Murray County	Wind Production Tax	\$ 988,890	\$ 919,825	\$ 1,019,153	\$ 667,532	\$ 644,365	
	Levy	\$ 7,424,478	\$ 7,838,245	\$ 7,990,107	\$ 8,309,623	\$ 8,655,308	\$ 9,001,407
	WPT as % of Levy	13%	12%	13%	8%	7%	0%
Cameron Twp	Wind Production Tax	\$ 60,689	\$ 56,804	\$ 54,519	\$ 44,552	\$ 44,509	
	Levy	\$ 38,204	\$ 38,204	\$ 38,240	\$ 38,240	\$ 38,240	\$ 48,000
	WPT as % of Levy	159%	149%	143%	117%	116%	0%
Chanarambie Twp	Wind Production Tax	\$ 45,319	\$ 49,542	\$ 56,456	\$ 53,169	\$ 28,838	
	Levy	\$ 10,000	\$ 10,000	\$ 10,000	\$ 10,000	\$ 10,000	\$ 15,000
	WPT as % of Levy	453%	495%	565%	532%	288%	0%
Fenton Twp	Wind Production Tax	\$ 63,350	\$ 55,283	\$ 65,367	\$ 30,389	\$ 38,948	
	Levy	\$ 36,000	\$ 36,000	\$ 36,000	\$ 36,000	\$ 36,000	\$ 36,000
	WPT as % of Levy	176%	154%	182%	84%	108%	0%
Moulton Twp	Wind Production Tax	\$ 71,294	\$ 62,320	\$ 73,295	\$ 34,894	\$ 44,687	
	Levy	\$ 37,175	\$ 30,000	\$ 30,000	\$ 30,000	\$ 30,000	\$ 30,000
	WPT as % of Levy	192%	208%	244%	116%	149%	0%

NOTE: 2024 Wind Production Tax Amounts are based on 2023 wind production, which are not currently available.