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February 4, 2016

Daniel P. Wolf
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. E999/M-15-439

Dear Mr. Wolf:

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

2015 Biennial Transmission Projects Report.

The petition was filed on October 30, 2015, by the Minnesota Transmission Owners.

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

Sincerely,

/s/ MICHAEL N. ZAJICEK
Rates Analyst

MNZ/
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE
DIVISION OF ENERGY RESOURCES

DOCKET No. E999/M-15-439

I. INTRODUCTION

On October 30, 2015, the Minnesota Transmission Owners (MTO) submitted to the Minnesota Public Utilities Commission (Commission) MTO's *2015 Biennial Transmission Projects Report* (Report). MTO is a coalition of sixteen electric utilities that own or operate high voltage transmission facilities in Minnesota.¹ The Petition provides a review of MTO's transmission planning activities. Northwestern Wisconsin Electric Company (NWECC) did not file a biennial transmission report.²

The Report does not seek certification of any high voltage transmission line. Therefore, pursuant to Minnesota Rules 7848.1800, subpart 3 and the Commission's November 12, 2015 *Notice of Comment Periods and Deadlines*, comments on the Report's compliance with the filing requirements (Minnesota Rules 7848.1300) and procedural recommendations were due November 20, 2015 with reply comments due January 15, 2016. The Department notes that petitions to intervene³ and comments on the merits,⁴ including any procedural recommendation,⁵ were to be submitted by January 15, 2016.⁶ The Department apologizes for these late-filed comments, and requests a variance to Minnesota Rules 7848.1800 subpart 5, which specifies that Initial comments must be filed by January 15, so as to allow the Department's analysis to be considered in the proceeding.

On November 20, 2015, comments on compliance with the filing requirements were filed by the Department. MTO filed supplemental data December 7, 2015 and December 16, 2016.

¹ The members of MTO are: American Transmission Company, LLC; Dairyland Power Cooperative; East River Electric Power Cooperative; Great River Energy (GRE); Hutchinson Utilities Commission; ITC Midwest LLC; L&O Power Cooperative; Marshall Municipal Utilities; Minnesota Power; Minnkota Power Cooperative; Missouri River Energy Services; Northern States Power Company d/b/a Xcel Energy (Xcel); Otter Tail Power Company; Rochester Public Utilities; Southern Minnesota Municipal Power Agency; and Willmar Municipal Utilities.

² On October 22, 2009 Northwestern Wisconsin Electric Company (NWECC) filed NWECC's *Transmission Projects Biennial Report (TPBR)*. The TPBR states "NWECC owns approximately three miles of 69kV transmission line and a portion of a 230kV substation."

³ Minnesota Rules 7848.1900, subpart 4.

⁴ Minnesota Rules 7848.1900, subpart 5.

⁵ Minnesota Rules 7848.1900, subpart 6.

⁶ Minnesota Rules 7848.1800, subpart 5.

Below are the comments of the Department on the merits of the Report.

II. VARIANCE REQUEST

The Department requests a variance to Minnesota Rules 7848.1800, subpart 5 so as to allow the Department's analysis to be considered in the proceeding. Minnesota Rules 7829.3200, subpart 1 states that the Commission shall grant a variance when the following conditions have been 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.

The Department believes enforcement of the rule would impose an excessive burden on the public interest and the Commission. Not allowing the Department's comments into the record in this proceeding would result in an incomplete record for the Commission's consideration.

For similar reasons, granting the variance is in the public interest as it would allow for comments from the Department, the public advocate in this matter, to be included in the record. Additionally granting this variance request would not adversely affect the MTO as the MTO would still have until March 1⁷ to file reply comments, and the Department's recommendations in this manner should not require additional information to be filed by the MTO.

Finally, granting this variance would not conflict with any standards imposed by law. Thus the Department believes that granting of a variance to Minnesota Rules 7848.1800 subpart 5 is reasonable under the criteria laid out in Minnesota Rules pt. 7829.3200, subp. 1.

III. ANALYSIS OF PLANNING ACTIVITIES

A. NVEC

NVEC did not submit a biennial transmission plan. Given the limited nature of NVEC's Minnesota transmission system as referenced in footnote 2, the Department has no comments regarding NVEC.

⁷ Minnesota Rules 7848.1800, subpart 7.

B. MTO

1. Existing Transmission Issues

The first step in maintaining a reliable transmission system is to address areas where the current transmission system cannot provide reliable service. Department Information Request No. 1 requested MTO to list the areas where historical demand had been greater than the supply capability after a single contingency occurs. In response, MTO listed 12 areas as follows:

1. 2015-WC-N2 - Douglas County – West Union 69 kV Line Rebuild
2. 2015-TC-N3 - SW Twin Cities Project
3. 2015-SW-N1 - Yankee Reactor
4. 2015-SW-N2 - Fenton Reactor
5. 2011-SE-N5 - Arlington-Green Isle 69 kV
6. 2015-SE-N4 - Line 0714 Rebuild
7. 2011-NE-N2 - 15 Line Upgrade
8. 2013-NE-N22 - 5 Line Upgrade
9. 2015-NE-N2 - 868 Line Upgrade
10. 2015-NE-N14 - 83 Line Upgrade
11. 2015-NE-N15 - 95 Line Upgrade
12. 2013-SW-N1 - Heron Lake Capacitors

In the list above, the year indicates when the issue first arose in the biennial plan. Department Information Request No. 1 also requested MTO to provide an estimated date by which reliability would be restored to each of the above areas. In response MTO indicated that reliability would be restored as follows:

- 1 issue by second quarter 2016 (2015-WC-N2);
- 2 issues by the end of 2016 (2015-TC-N3, 2015-SW-N1);
- 4 issues in 2017 (2015-SW-N2, 2011-NE-N2, 2015-NE-N14, 2015-NE-N15);
- 3 issues in 2019 (2015-SE-N4, 2013-NE-N22, 2013-NE-N22);
- 1 issue in 2020 (2011-SE-N5); and
- 1 issue to be addressed after 2021 (2013-SW-N1).

As indicated in the Department's comments in prior transmission planning dockets, the Department expects that transmission deficiencies will exist for a variety of reasons that are beyond MTO members' control. In this case seven of the twelve issues will be fixed within the next two years (by year-end 2017).

2. Forecasted Transmission Issues

An early step in addressing forecasted inadequacies is to obtain the necessary permits. In order to monitor MTO's progress in terms of obtaining necessary permits, Department Information Request No. 2 requested MTO to provide a schedule with estimated dates for the submission of certificate of need (CN) applications for situations where MTO has a potential solution and that potential solution may require a CN. MTO's response is

summarized below in Table 1. Table 1 shows the schedule of estimated filing dates for CN applications for the projects. Some projects reported by MTO are dependent upon CNs already under review or already approved by the Commission. These projects are not included in Table 1.

Table 1: Schedule of Certificates of Need

Tracking Number	Project	Estimated Filing Date	Responding Utility
2015-NW-N1	Clearbrook West 115 kV-Bagley West 230 kV	May 2016	OTP
2013-NE-N22	Elisha 115kV Project	September 2017	GRE
2007-NW-N3	Winger-Thief River Falls 230 kV	August 2018	OTP

MTO's October 30 Report and the MTO website incorrectly indicate that two projects that will require certificates of need (CNs) would not require any CN. In addition, MTO's Report did not indicate any dates by which MTO expected to file for CNs for these projects; however, as noted above, MTO's response to information requests from the Department⁸ indicated that MTO expects to file a request for a CN for project 2015-NW-N1 in 2016. Thus, the Department provides the following to correct the record.⁹

The first project that MTO's inaccurately stated would not require a certificate of need is project 2015-NW-N1.¹⁰ However, the Department's analysis indicates that a CN will be required since the project proposes to add 16 miles of a transmission line to interconnect a new substation to the Clearbrook West 115 kV substation. This size and length of a transmission line is defined as a Large Energy Facility, per Minnesota Statutes section 216B.2421, subd. 2(3) and thus requires a CN.

The second project for which MTO's Report incorrectly stated that no CN would be necessary is 2007-NW-N3, which the Report describes as follows:

The Winger-Thief River Falls 230 kV Line project consists of a Winger substation expansion, a Thief River Falls substation expansion, a new 47 mile 230 kV transmission line between Winger and Thief River Falls and a new 230/115 kV transformer at Thief River Falls.

Since a 47-mile 230 kV transmission line clearly qualifies as a Large Energy Facility and thus requires a CN, the Report should have identified this project as requiring a CN. The Report indicates that the purpose for the two projects is as follows:

⁸ See Attachment 1 to these comments.

⁹ The Department also notes that MTO should correct the inaccurate statements regarding requirements for CNs in MTO's biennial transmission report on file with the Minnesota Legislative Library (<http://archive.leg.state.mn.us/docs/2015/mandated/151162.pdf>). Subsequently, the January 2016 Report, MINNESOTA'S ELECTRIC TRANSMISSION SYSTEM: NOW AND INTO THE FUTURE, which relied on the representations in the Report, will be updated to correct for MTO's misrepresentations.

¹⁰ Report at page 42.

The Clearbrook area is a developing hub of crude oil pipelines, and those pipelines require pumping stations. These pumping stations are served by a network of 115 kV lines with two 230 kV sources at Wilton and Winger. Loss of any one source forces the load to be served from a single source. Additionally, loss of any transmission between Bagley and Clearbrook threatens a substantial amount of existing and future load service. The proposed transmission facilities include a 16 mile transmission line and a new substation.

Table 1, which corrects the inaccuracies in MTO’s Report and website, shows that MTO’s members plan to submit 2 CN petitions by the end of 2017. This data indicates that MTO’s members are pursuing required permits in a timely manner.

Numerous projects were reported as potentially requiring a CN but not yet having a filing date estimated. These projects are shown in Table 2 below.

Table 2: Potential Certificates of Need

Tracking Number	Project	Estimated Filing Date	Responding Utility
2003-WC-N7	Panther Area	2021 - Need based on area load growth	GRE
2007-NE-N1	Duluth Area 230 kV	2020-2021 Depending on future studies	MP
2015-NE-N12	Iron Range-Arrowhead 245 kV Project	No current need to construct the project.	MP
2011-WC-N4	Convert Minn. Valley-Panther-McLeod-Blue Lake 230 kV line to Double circuit 345 kV from Hazel to McLeod to West Waconia to Blue Lake	Indefinite timeline	Xcel

The Department briefly reviewed MTO’s discussion for the projects listed in Table 2. The table shows that there are relatively few projects planned at this time that potentially require CNs where the timeline is not yet known. The Department has no concerns with any of these projects or their estimated CN filing dates.

C. TRANSMISSION FOR RENEWABLES

The Report also contains a section regarding Minnesota’s Renewable Energy Standard (RES Report) in compliance with Minnesota Statutes §216B.2425, subd. 7. The RES Report is a joint effort separate from that of MTO but containing many of the same utilities.¹¹ Minnesota Statutes §216B.2425, subd. 7 governing the RES Report states:

¹¹ The utilities sponsoring the RES Report are: Interstate Power and Light Company, Minnesota Power, Northern States Power Company, Otter Tail Power Company, Dairyland Power Cooperative, Basin Electric Power Cooperative, East River Electric Power Cooperative, Great River Energy, L&O Power Cooperative, Minnkota Power Cooperative, Central Minnesota Municipal Power Agency, Minnesota Municipal Power Agency, Rochester Public Utilities, Southern Minnesota Municipal Power Agency, Western Minnesota Municipal Power Agency/Missouri River Energy Services, and Heartland Consumers Power District (jointly, RES Utilities).

Each entity subject to this section shall determine necessary transmission upgrades to support development of renewable energy resources required to meet objectives under section 216B.1691 and shall include those upgrades in its report under subdivision 2.

In compliance with this statute, the RES Report starts with a gap analysis which provides “an estimate of how many more megawatts of renewable generating capacity a utility expects to need beyond what is presently available to obtain the required amount of renewable energy.” The RES Report shows that utilities subject to the Minnesota RES have sufficient capacity acquired to meet the Minnesota RES needs through 2025. According to the chart on page 142 of the Report, the Minnesota RES utilities also have enough capacity to meet the RES needs of other jurisdictions as well as Minnesota’s RES needs through 2025. Thus it appears that significant additional transmission investment is not required in the near future.

The RES Utilities note that, in its May 18, 2012 Order, the Commission directed the MTO to provide an update on the Corridor Upgrade Project. The Corridor Upgrade Project is an upgrade of the 230-kV line between the Hazel Creek Substation near Granite Falls, Minnesota, and the Blue Lake Substation in Shakopee, Minnesota to a double circuit 345-kV system. The Corridor Upgrade would provide significant new transmission capacity from the Dakotas, southwestern Minnesota and western Minnesota to the Twin Cities, at a cost estimated in 2009 to be approximately \$350 million. As a result of the May 12, 2014, Order approving the 2013 Biennial Transmission report, the Commission recognized that the schedule for the Corridor Upgrade project has likely moved out beyond 2018 and did not require the utilities to report on the status of the project in the 2015 Report.

Based upon this information the Department agrees with the RES Utilities that immediate action regarding the Corridor Upgrade Project is not necessary.

D. SOLAR ENERGY STANDARD

In 2013, the Minnesota Legislature established a solar energy standard (SES) for public utilities, effective by the end of 2020. Minn. Laws 2013, Ch. 85, § 3, codified at Minnesota Statutes § 216B.1691, subd. 2f (Solar energy standard), establish a solar energy standard at 1.5 percent of a utility’s retail sales by the end of 2020.

That statute requires public utilities subject to the SES to report to the Commission on July 1, 2014, and each July thereafter, on progress in achieving the standard. The first reports were filed with the Commission in May and June of 2014, and accepted in an Order dated October 23, 2014.¹² The second set of reports were filed in the summer of 2015 and were approved by the Commission in an October 28, 2015 Order.¹³ More information is provided on the utilities’ progress toward meeting the upcoming SES in those dockets. The MTO briefly discussed the SES in the Report and presented data that indicates that the MTO utilities subject to the SES are on pace to meet the 2020 and 2025 SES requirements.

¹² Docket No. E999/M-14-321.

¹³ Docket No. E999/M-15-462

E. RENEWABLE ENERGY INTEGRATION STUDY

The 2013 Minnesota Legislature directed Minnesota transmission owners to study the reliability and cost implications of increasing the renewable energy standard to 40 percent by 2030. The Commission's July 22, 2013 Order described the background for this study as follows:

Minnesota Laws 2013, Chapter 85, Article 12, Section 4(a) directs the Commission to order all electric utilities as defined in Minn. Stat. § 216B.1691, subd. 1(b), and all transmission companies as defined in Minn. Stat. § 216B.02, to conduct an engineering study of the impacts on reliability and costs, including necessary transmission network upgrades, of increasing the renewable energy standard established in Minn. Stat. § 216B.1691, subd. 2a, to 40 percent by 2030, and to higher proportions thereafter, while maintaining system reliability. The Act requires the study to be completed and submitted to the Commission by November 1, 2014.

Section 4(b) of the Act requires Minnesota electric utilities and transmission companies to complete the study under the direction of the commissioner of the Department of Commerce (the commissioner).

Section 4(c) of the Act requires electric utilities and transmission companies to incorporate and build upon current and previous studies conducted in Minnesota of relevance to the Renewable Energy Standard. As part of the planning process, the electric utilities and transmission companies are also required to collaborate with the Midcontinent Independent System Operator (MISO), to encourage the integration of Minnesota's planning work and other regional considerations into MISO's future transmission expansion planning work.

Finally, the study is required to include a conceptual plan for the transmission necessary for generation interconnection and delivery. The report must include a description of the analyses conducted and the results obtained, and must identify any critical issues and potential solutions to identified issues as they pertain to increasing the renewable energy standard to 40 percent by 2030.

The Department met on September 13, 2013 with utility and MISO transmission engineers and management, along with all those who had indicated an interest in this issue. On September 26, 2013, the Commissioner of Commerce appointed a technical review committee to develop the technical analysis. The technical review committee submitted the Final Report of the Minnesota Renewable Energy Integration and Transmission Study to the Legislature on October 31, 2014.

F. MITIGATION COSTS

As utilities have been building more infrastructure and more significantly sized infrastructure, it has become increasingly necessary to ensure that utilities use cost discipline as they construct new resources. To encourage cost discipline and prevent ratepayers from paying more than is reasonable for new utility infrastructure, the Department and Commission have been holding utilities accountable by comparing the utilities' estimated costs of a project as proposed in a CN proceeding to the actual cost of the project requested in a rate recovery proceeding. Utilities are not allowed to recover any cost overruns through riders and at a minimum, must justify in a general rate case any cost recovery above the amount the utility originally indicated that the project would cost. This requirement is an important tool to ensure that cost discipline is maintained throughout the regulatory process. The presence of cost discipline is important to ensure the accuracy of cost estimates used in planning proceedings such as resource plans and the biennial transmission plan. Such cost estimates are used to make significant decisions so it is important to minimize errors in estimation to avoid poor decisions and higher system costs.

Due to significant additions in infrastructure expected now and in the future, the Department concludes that additional measures are necessary to help ensure that costs charged to ratepayers for upgrades to the electric system are reasonable. Further, it is important to ensure that decisions made by a utility in response to local governments reasonably consider cost implications, and that costs of upgrades are allocated appropriately to ratepayers, based on ratemaking principles such as cost-causation, cost minimization and administrative feasibility. When utilities install infrastructure in an area, there are always mitigation measures involved. So long as the costs of such measures are reasonable, prudent and relatively small in size, it is generally reasonable to allow the costs to be borne by all ratepayers.¹⁴ However, when a mitigation measure is not needed for electrical purposes and is significant in size, it is important to consider whether the costs should be allocated to the entire rate base or to a smaller group of customers, based on the entity requesting such enhancement or optional mitigation. An example of such a mitigation measure is undergrounding transmission facilities for aesthetic reasons. Because such options increase costs not only of installation but also ongoing maintenance of the facilities, and because the beneficiaries of such designs can be limited to local ratepayers, careful consideration should be given to proposals to charge the incremental costs of optional undergrounding to all ratepayers. Application of cost-causation principles are important because, if such optional mitigation costs are consistently allocated to the entire rate base, the incentive to prudently control costs throughout the permitting processes is reduced.

¹⁴ It would not be administratively feasible or desirable to tailor rates in each area of Minnesota to reflect incremental costs of all optional mitigation measures in the area.

As in previous comments on biennial transmission reports, the Department continues to recommend that the Commission require the rate-regulated electric utilities – Otter Tail Power Company, Minnesota Power, and Xcel – to provide the following information in future rate requests to recover the costs of new energy facilities:

- a summary of all mitigation measures that have been added at any step in the permitting process,
- the general reason for the mitigation measure, including whether the measure was requested or required,
- the entity requesting or requiring the mitigation, and
- the cost of the mitigation measure.

This list should include data regarding mitigation measures that the utilities undertook voluntarily. Such data will enable cost allocations to be considered in ratemaking as appropriate and in a more accurate and consistent manner. The Department also notes that these recommended reporting requirements do not in any way limit the Commission's decision-making authority but instead would better inform the Commission's decision-making process.

III. DEPARTMENT RECOMMENDATION

The Department requests a variance to Minnesota Rules 7848.1800 subpart 5 so as to allow the Department's analysis to be considered in the proceeding via Minn. Rules pt. 7829.3200.

The Department recommends that the Commission approve the Petition.

In addition, the Department recommends that the Commission require Otter Tail Power Company, Minnesota Power, and Xcel to provide the following information in future rate requests to recover the costs of new energy facilities:

- a summary of all mitigation measures that have been added at any step in the permitting process,
- the general reason for the mitigation measure, including whether the measure was requested or required,
- the entity requesting or requiring the mitigation, and
- the cost of the mitigation measure.

This list should include data regarding mitigation measures that the utilities undertook voluntarily.

- Non Public Document – Contains Trade Secret Data**
 Public Document – Trade Secret Data Excised
 Public Document

Minnesota Transmission Owners

Docket No.: E999/M-15-439

Response To: MN Department of Information Request No. 2
Commerce

Requestor: Michael Zajicek

Date Received: January 6, 2016

Question:

Chapter 6 of the 2015 Biennial Transmission Planning Report indicates that several tracking numbers require a solution which will or might require a certificate of need. For each, please provide:

- a. a schedule showing an estimated date by which a certificate of need would be filed; and
- b. an estimated date by which construction would begin.

Response:

(A) Great River Energy

2003-NE-N2 – Cromwell-Wrenshall-Mahtowa-Floodwood Area (GRE/MP)

- a. Complete. Docket No. ET2,E015/CN-10-973.
- b. Complete. Began in 2012, substantially complete in 2015. Minor portion of the project involving an upgrade to an existing transmission line remaining to be completed in 2016.

2013-NE-N21 – Menahga Area 115 kV Project (GRE/MP)

- a. Complete. Docket Nos. ET2, E015/CN-14-787; ET2, E015/TL-14-797.
- b. April 22, 2016.

2013-NE-N22 – Elisha 115 kV Project

- a. September 1, 2017.
- b. March 1, 2019.

2015-NE-N6 – Motley Area 115 kV Project (GRE/MP)

- a. Complete. Docket Nos. ET2, E015/CN-14-853; ET2, E015/TL-15-204.
- b. December 6, 2016.

2015-NE-N18 – Palisade Pumping Station (X3A)

- a. Complete. Docket No. ET2/TL-15-423.
- b. January 1, 2017.

2003-WC-N7 – Panther Area

- a. 2021-need based on area load growth.
- b. 2022-need based on area load growth.

2009-TC-N2 – New Market & Cleary Lake Area Projects

- a. Complete. Docket No. ET-2/CN-12-1235.
- b. Complete.

(B) Minnesota Power

2007-NE-N1 – Duluth Area 230 kV

- a. Recent study indicates that this project is not needed until the mid-2020s at the earliest. Minnesota Power is regularly re-evaluating the need for the project and would plan to file a Certificate of Need Application approximately 3 years in advance of the need date, to allow appropriate time for permitting and construction. Assuming that the project is not needed until the mid-2020's, the earliest that Minnesota Power would file a Certificate of Need Application would be in 2020 or 2021.
- b. Construction expected to start approximately 1.5-2 years after CON submitted.

2013-NE-N13 – Great Northern Transmission Line

- a. Minnesota Power filed a Certificate of Need Application for the Great Northern Transmission Line Project in October 2013 and the Certificate of Need was subsequently granted by the Commission in June 2015 (Docket No. E015/CN-12-1163).
- b. Pending the Commission's decision on the Route Permit Application (Docket No. E015/TL-14-21), Minnesota Power expects to begin construction of the project in 2017.

2015-NE-N12 – Iron Range-Arrowhead 345 kV Project

- a. Minnesota Power has no current plans to construct the Iron Range – Arrowhead 345 kV Project. Should the project become necessary in the future due to additional Manitoba – United States transmission service requests or other system reliability needs, it will be advanced at that time. Because there is no current need for the project, there is no relevant timeline for filing a Certificate of Need Application.
- b. See response to a.

(C) Northern States Power Company

2011-WC-N4 - Convert Minn Valley - Panther - McLeod - Blue Lake 230 kV line to Double circuit 345 kV from Hazel to McLeod to West Waconia to Blue Lake

- a. The project need has not been identified yet so the CON date is unknown at this time.
- b. The project need has not been identified yet so the construction date is unknown at this time.

(D) ITC Midwest

2013-SW-N4 - New 345 kV line from Lakefield Junction to Kossuth County via Winnebago and Winco and a new 345 kV line from Obrien County to Webster via Kossuth County. Includes 161 kV rebuild as underbuild along portions of the route.

- a. The CON application was submitted March 22, 2013 in Docket No. ET6675/CN-12-1053, and was granted in an Order dated November 25, 2014.
- b. The project is currently under construction.

(E) Otter Tail Power Company/Minnkota Power Cooperative, Inc.

2007-NW-N3 - Winger-Thief River Falls 230 kV Line

- a. New and existing load growth will drive the exact timing of this project. CON filing currently expected in August of 2018.
- b. Construction is estimated to begin in December of 2020.

2015-NW-N1 - Clearbrook West 115 kV-Bagley West 230 kV

- a. CON filing currently expected in May of 2016.
- b. Construction is estimated to begin in January of 2018.

Date: January 28, 2016

Preparer: Great River Energy-Wayne Roelofs
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Department: Transmission Planning
Telephone: 763-445-5952

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CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Comments**

Docket No. E999/M-15-439

Dated this 4th day of February 2016

/s/Sharon Ferguson

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Joel	Larson	jl Larson@minnkota.com	Minnkota Power Cooperative, Inc.	1822 Mill Road Grand Forks, ND 58203	Electronic Service	No	OFF_SL_15-439_Official Service List 2015 Bien Tran Projects
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John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	No	OFF_SL_15-439_Official Service List 2015 Bien Tran Projects
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_15-439_Official Service List 2015 Bien Tran Projects

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Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-439_Official Service List 2015 Bien Tran Projects
David W.	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	Suite 300 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-439_Official Service List 2015 Bien Tran Projects
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_15-439_Official Service List 2015 Bien Tran Projects
Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	OFF_SL_15-439_Official Service List 2015 Bien Tran Projects
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Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_15-439_Official Service List 2015 Bien Tran Projects
Ron	Spangler, Jr.	rlspangler@otpc.com	Otter Tail Power Company	215 So. Cascade St. PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_15-439_Official Service List 2015 Bien Tran Projects
Byron E.	Starns	byron.starns@stinson.com	Stinson Leonard Street LLP	150 South 5th Street Suite 2300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-439_Official Service List 2015 Bien Tran Projects
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_15-439_Official Service List 2015 Bien Tran Projects
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