

July 8, 2024

VIA ELECTRONIC FILING

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

**Re: In the Matter of the Application for a Certificate of Need for the Big Stone South – Alexandria – Big Oaks Transmission Project; and In the Matter of the Application for a Route Permit for the Alexandria to Big Oaks 345-kV Transmission Project in Central Minnesota**

Dear Mr. Seuffert,

Clean Energy Economy Minnesota (CEEM) respectfully submits these comments for PUC Docket Numbers CN-22-538 (Certificate of Need), TL-23-159 (Route Permit). Our mission at CEEM is to provide educational leadership, collaboration, and policy analysis that accelerates clean energy market growth and smart energy policies. We work to support and expand clean energy jobs and the economic opportunities provided by clean, reliable, and affordable energy on behalf of all Minnesotans.

Please feel free to contact us with any questions that you may have. We hope that the comments below provide you with useful insights.

Regards,



George Damian  
Director of Government Affairs  
[gdamian@cleanenergyeconomymn.org](mailto:gdamian@cleanenergyeconomymn.org)



Gregg Mast,  
Executive Director  
[gmast@cleanenergyeconomymn.org](mailto:gmast@cleanenergyeconomymn.org)

State of Minnesota  
Before the  
Minnesota Public Utilities Commission

Katie J. Sieben	Chair
Joseph K. Sullivan	Vice-Chair
Hwikwon Ham	Commissioner
Valerie Means	Commissioner
John Tuma	Commissioner

In the Matter of the Application for a Certificate of Need for the Big Stone South – Alexandria – Big Oaks Transmission Project; and In the Matter of the Application for a Route Permit for the Alexandria to Big Oaks 345-kV Transmission Project in Central Minnesota

CLEAN ENERGY ECONOMY  
MINNESOTA'S

COMMENTS

PUC Docket Number: CN-22-538  
(Certificate of Need) and TL-23-159  
(Route Permit)

## INTRODUCTION

### Clean Energy Economy Minnesota

Clean Energy Economy Minnesota (“CEEM”) is an industry led, nonpartisan, non-profit organization representing the business voice for energy efficiency and clean renewable energy in Minnesota. Given its mission and purpose, CEEM supports public policies that empower consumers and provide efficient pathways to expand business opportunities for clean energy resources to benefit consumers.

CEEM has a strong interest in ensuring public policies, such as Minnesota’s decarbonization laws, are fully implemented in a manner such that Minnesota regains its leadership role in efforts to foster and advance the use of a diverse mix of clean renewable energy to serve Minnesotans.

CEEM respectfully submits these Comments in response to the Minnesota Public Utilities Commission’s (the “Commission”) May 28, 2024, Notice of Public Hearings and Availability of Environmental Assessment.

## TOPICS OPEN FOR COMMENT

CEEM offers comments on two of the four topics open for comment:

- Should the Commission grant a certificate of need and route permit for the proposed Alexandria to Big Oaks 345 kV Transmission Project (Eastern Segment)?
- If granted, what additional conditions or requirements, if any, should be included in the route permit?

## COMMENTS

CEEM respectfully requests the Commission to grant the certificate of need and route permit for the proposed Alexandria to Big Oaks 345 kV Transmission Project with reliance on the project providing greater access to and transmission of electricity from clean renewable energy.

Project proposers state “the project is needed to provide benefits to the Midwest subregion of the Midcontinent Independent System Operator (MISO) footprint by facilitating more reliable, safe, and affordable energy delivery. The current 345 kV transmission system is at capacity which leads to several reliability concerns that could affect customers’ service. The project intends to provide additional transmission capacity, mitigate current capacity issues, and improve electric system reliability throughout the region as more renewable energy resources are added to the electric system in and around the region.”<sup>1</sup>

Minnesotans should have access to an electricity transmission system that has the capacity to reliably deliver electricity. Reliability can be expanded with the Alexandria to Big Oaks project because it can relieve system congestion and thereby decrease the frequency of power outages, improve power quality, and minimize costs to Minnesotans and the economy.<sup>2</sup> Minnesotans should also have access to more solar and wind energy because renewable energy can be used to meet the electricity needs of

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<sup>1</sup> Minnesota Department of Commerce, *Environmental Assessment: Alexandria to Big Oaks 345 kV Transmission Project*, [hereinafter “EA”], 6 (May 2024).

<sup>2</sup> Minnesota Department of Commerce, *Minnesota’s Electric Transmission System Annual Adequacy Report*, 11 - 12, (January 2024).

Minnesotans without emitting damaging greenhouse gas emissions.

Considering the manner in which the applicants are addressing decarbonization, we have some reservations regarding the extent to which renewable energy will be integrated into or made accessible to the proposed project. According to the Environmental Assessment: "The overall project is anticipated to help the state's carbon reduction goals. Total GHG emissions for project construction are estimated to be approximately 2,396 tons of carbon dioxide (CO<sub>2</sub>). Operational impacts from the formation of nitrous oxide and release of sulfur hexafluoride are minimal. The project as a whole will reduce CO<sub>2</sub> emissions by reducing congestion on the electrical grid enabling greater use of existing renewable generation and supporting the development of new renewable generation. Potential impacts due to both construction and operational GHG emissions are anticipated to be minimal and positive."<sup>3</sup>

We note the assessment specifically states "2,396 tons of carbon dioxide" are anticipated to be emitted during project construction while the assessment speaks in general terms about the anticipated decarbonization benefits. Currently, there is a lack of a corresponding specificity for the anticipated amount of renewable energy on the transmission line and the concomitant environmental benefits. While electricity distribution planning is a complex process, it should be more closely linked to resource planning. We urge the Applicants and the Commission to ensure that the Alexandria to Big Oaks project explicitly provides access to and transports larger amounts of electricity generated from solar and wind energy projects.

With respect to the particular route, "The applicants propose to string approximately 105-108 miles of 345 kV transmission line on existing double-circuit capable structures from the existing Alexandria Substation in Alexandria, Douglas County to the proposed Big Oaks Substation on the north side of the Mississippi River in Becker, Sherburne County, Minnesota."<sup>4</sup>

Using the existing double-circuit capable structures provides a colocation opportunity for the Alexandria to Big Oaks transmission project. Colocation has strong support from Minnesotans and it can remove a barrier to clean renewables. According to Nexgen Highways, opinion research shows 80% of Minnesotans want transmission built on existing right-of-ways. Further, "Transmission congestion and the long lag time it takes to permit and site new transmission is the biggest barrier to Minnesota

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<sup>3</sup> EA at 105.

<sup>4</sup> EA at 5.

achieving our 100% clean energy standard by 2040.”<sup>5</sup> In addition to public support for this type of colocation transmission project, the Alexandria to Big Oaks project holds potential to lower the barrier to renewable energy so Minnesota can meet its clean energy requirements by 2040.

## CONCLUSION

Transmission system upgrades will be key to getting new renewables online as the energy sector transitions from fossil fuels to renewables. The Alexandria to Big Oaks project colocation negates the need for a new route, holds the potential to address congestion, ensure greater reliability to the system, open access to renewables, and reduce greenhouse gas emissions. For these reasons, CEEM urges the Commission to grant the certificate of need and route permit for the proposed Alexandria to Big Oaks 345 kV Transmission Project, while keeping a close eye on the project to ensure greater access to and transmission of electricity from clean, renewable energy.

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<sup>5</sup> Nextgen Highways, <https://nextgenhighways.org/minnesota-coalition-to-advocate-for-building-transmission-along-highways/>, (July 3, 2024).