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February 27, 2026

VIA E-FILING
Ms. Sasha Bergman
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, MN 55101-2147

Re: In the Matter of the 2025 Biennial Transmission Projects Report.
Response to Request for Information PUC IR 3
MPUC Docket No. E999/M-25-99

Dear Ms. Bergman:

The Minnesota Transmission Owners ("MTO") respectfully submits this response to Minnesota Public Utilities Commission's ("MPUC") Request for Information PUC IR 3 issued on February 17, 2026 in the above referenced docket.

As requested by the MPUC, this response has been e-filed through www.edocket.state.mn.us.

Please let me know if you have any questions regarding this filing.

Sincerely,

FREDRIKSON & BYRON, P.A.

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MINNESOTA TRANSMISSION OWNERS
REQUEST FOR INFORMATION RESPONSE

☒ **Public Document**

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☐ **Public Document – Nonpublic Data Has Been Excised**

PUC IR 3

Project: 2025 Biennial Transmission Projects Report

MPUC Docket No.: E999/M-25-99

Response To: Minnesota Public Utilities Commission

Requestor: Minnesota Public Utilities Commission

Date of Request: February 17, 2026 Response Due Date: February 27, 2026

#3 Please refer to the MTEP 26 Reliability Planning Scope Overview presented at the 1st West Subregional Planning Meeting (WSPM) on Wednesday, February 11, 2026.

A. Provide a list of projects submitted by members of MTO for the MTEP26 cycle but not included in the 2025 Biennial Transmission Projects Report (BTPR) submitted to the Minnesota PUC October 31, 2025.
B. For each such project, explain why it was not included in the 2025 BTPR.
C. Provide all project documents sent to MISO in support of these projects.
D. Provide all documents evaluating alternatives to these projects, including GETs, that have been supplied to MISO.

Provide all attachments in a live editable format with formulas intact, as applicable.

RESPONSE: In response to the Information Request, four members of the Minnesota Transmission Owners (MTO) had submitted projects for the MTEP26 cycle that were not included in the BTPR. To the extent there are Minnesota transmission projects that are eligible for inclusion in the next BTPR, they will be included by the MTO.

Great River Energy
Based on GRE's understanding of the BTPR requirements (Minn. Stat. § 216B.2425 and Minn. Stat. § 216I.02, subd. 8), GRE includes projects that are 100kV and higher in the BTPR. All of GRE's projects exceeding 100kV in the MISO West SPM are part of the BTPR.

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Response Date: February 27, 2026

(RESPONSE Continued…)

ITC Midwest

A. ITC Midwest has one project that was submitted to MTEP 26 but was not included in the BTPR. That project is the Springfield Load Addition, MTEP 26 Project ID 50951.

B. ITC Midwest did not include this project in the BTRP because ITC Midwest does not consider a project to be a planned project until it has been submitted to the MTEP process, gone through the MISO and stakeholder review process that occurs as part of MTEP, and is ultimately approved by MISO at the end of the MTEP process. This is because the MISO MTEP process allows stakeholders to provide feedback and project alternatives, which can ultimately modify the project prior to its approval by MISO.

C. See attached file "P#50951 Springfield Load Addition - Project Justification.pdf" for the project justification document provided for the project in support of the project.

D. Due to the nature of the project, which is to connect a new substation with associated additional load being added to the system, GETs were not considered as a solution. None of the transmission system upgrades being proposed are due to transmission system thermal loading issues. A capacitor bank upgrade, which is a common solution to address low voltage on the transmission system by increasing system voltage by providing a source of reactive power, is being proposed in addition to the transmission system modifications required to connect the new requested substation to the transmission system.

Otter Tail Power

Otter Tail Power's MTEP26 projects that were not part of the BTPR are provided in the attached spreadsheet "25-099 MPUC-3-001 OTP-Xcel" along with responses to the Information Request.

Xcel Energy

Xcel Energy's MTEP26 projects that were not part of the BTPR are provided in the attached spreadsheet "25-099 MPUC-3-001 OTP-Xcel" along with responses to the Information Request.

Springfield Load Addition

MTEP Project ID: 50951

System Concern
Springfield Public Utilities has requested to interconnect a new substation and load addition to the ITC Midwest transmission system.

Recommended Proposal and Reasoning
To support system voltages in the area with the increased load, ITC Midwest will need to upgrade the existing 69 kV capacitor bank at the ITC Midwest owned Waterbury switching station. The upgraded 69 kV capacitor will have 2 stages of 11.2 MVAR (22.4 MVAR total). ITC Midwest will also install new 69 kV main line switches to allow Springfield Public Utilities to connect a new Springfield Public Utilities owned 69 kV tap to their new substation.

Planning Criteria Violation and System Analysis
The new load interconnection does not cause any transmission system violations or reliability concerns with the proposed system upgrades.

Infrastructure Criteria Violations and System Issues
The new load interconnection does not cause any transmission infrastructure criteria violations or system issues with the proposed system upgrades.

System Outages Causing Concerns

N/A

Long Term Vision and Benefits
The system upgrades support Springfield Public Utilities' request to interconnect their new substation and associated load addition.

Other Project Justification

N/A

Project Proposals

Proposal 1: (Selected)

Install new 69 kV main line switches to allow Springfield Public Utilities to connect a new Springfield Public Utilities 69 kV tap between their new substation and the ITC Midwest 69 kV line and upgrade existing 69 kV capacitor bank at ITC Waterbury Switching Station to a 2 x 11.2 MVAR capacitor bank.

Estimated Project Cost: $1,781,966

Proposal 2:

N/A – Customer connection request

Estimated Project Cost: $N/A

Appendix A – Violation Tables

N/A – no violations with the proposed 69 kV capacitor bank upgrade at Waterbury.

MTEP Project Portal fields					PUC IR3 Response		
Project Name	State(s)	MTEP Project ID	Project Description	System Need	Reason for exclusion from 2025 BTPR	Project documents provided to MISO	Alternatives provided to MISO
OTP Britton Tie Rebuild	SD	51215	Rebuild OTP's Britton emergency 69/41.6 kV tie replacing aging and limiting transformer with new transformer.	Aging infrastructure and transformer that is also too small to support load. Larger transformer is needed to support reliability.	Non-MN project	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
OTP Asset Management Blanket	MN; ND; SD	51018	Blanket project to capture switch and breaker replacements as identified.	Switch and breaker replacements as work can be done and identified.	These like-for-like equipment replacements aren't indicative of a transmission inadequacy; however, they do in some cases meet conditions that require reporting in MTEP (defined in MISO's BPM-020)	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
OTP Pickert Reactor Retirement	ND	51001	Retire 41.6 kV reactor at Pickert 41.6 kV.	Aging Asset	Non-MN project	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
OTP Browns Valley 41.6 kV Line Recloser	SD	51000	Install line recloser near Browns Valley 41.6 kV.	Reduce 41.6 kV line exposure and improve reliability	Non-MN project	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
OTP St. Thomas 41.6 kV Line Recloser	ND	50998	Install line recloser near St. Thomas 41.6 kV.	Reduce 41.6 kV line exposure and improve reliability	Non-MN project	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
OTP Wilton - Bemidji 41.6 kV Line Rebuild	MN	50996	Rebuild 41.6 kV line between Wilton 41.6 and Bemidji 41.6 kV.	Aging Asset replacement	41.6 kV transmission does not meet definition of HVTL for report inclusion.	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
OTP Audubon 41.6 kV Line Rebuild	MN	50995	Rebuild 41.6 kV line out of Audubon 41.6 kV.	Aging Asset replacement	41.6 kV transmission does not meet definition of HVTL for report inclusion.	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
OTP Plummer 41.6 kV Line Rebuild	MN	50992	Rebuild 41.6 kV line out of Plummer 41.6 kV.	Aging Asset replacement	41.6 kV transmission does not meet definition of HVTL for report inclusion.	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
OTP Hobart Lake 41.6 kV Line Reroute	ND	50991	Reroute 41.6 kV line between Sanborn 41.6 kV and Fingal jct. 41.6 kV.	Aging Asset replacement and accessibility needs.	Non-MN project	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
NSP East Shakopee Interconnection	MN	51194	New 3 way tap structure to accommodate MMPA East Shakopee interconnection on Black Dog - Blue Lake 115kV line.	Accommodate MMPA interconnection request.	New Load Interconnection	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
NSP Buffalo Power Station 2 Interconnection	MN	51193	New 3 way tap structure to accommodate MMPA interconnection tying into 69kV line between the Buffalo 3 way tap and Maple Lake.	Transmission interconnection request from MMPA	T-T Interconnection	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
NSP Shetek Substation	MN	51166	New distribution substation to replace degraded Tracy Switching Station	Tracy Switching Station equipment is at end of life and in need of expansion. Current footprint is inadequate for expansion.	Replace end of life substation	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
NSP Inverhills TR10	MN	51095	Install 2nd 345kV/115kV transformer at Inverhills.	Mitigates N-1-1 overload conditions.	Area load growth	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
NSP Kohlman Lake Switch Upgrade	MN	51078	Upgrade switches and wavetrap to remove rating limiters on Kohlman Lake - Coon Creek 345kV line.	Remove limiters on 345kV Kohlman Lake - Coon Creek line to increase rating.	Area load growth	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
NSP Glenwood Capacitor Addition	MN	51077	Replace failed Glenwood capacitor and add an additional bank.	Support local area voltage.	Low voltages in area	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
NSP Wagon Wheel Substation	MN	51076	New Distribution substation to replace existing La Crescent substation which is experiencing age and condition degradation.	Existing substation is experiencing environmental degradation and needs to be relocated.	New Load Interconnection	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None

NSP Blue Lake TR1 Replacement	MN	50881	Replace Blue Lake 115kV/13.8kV TR1.	Age and Condition replacement.	Distribution transformer, non-HVTL	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
NSP Cherry Creek - Grant 115kV Rebuild	SD	50880	Rebuild of the 23.8-mile long single-circuit 115kV Line between Cherry Creek and Grant substations.	Age and condition rebuild of structures.	Non-MN project	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
NSP Grant - Mitchell 115kV Rebuild	SD	50879	Rebuild 24.0-mile long single-circuit 115kV line between Grant substation and NWPS Interconnect (Mitchell).	Age and condition rebuild of structures.	Non-MN project	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
NSP Nobles - DC Redundancy	MN	50878	Install second battery at Nobles substation.	Mitigate TPL-001-5 P5 contingency.	NERC TPL Redundancy DC System	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
NSP Wilmarth - DC Redundancy	MN	50874	Install second battery at Wilmarth substation.	Mitigate TPL-001-5 P5 contingency.	NERC TPL Redundancy DC System	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
NSP Lake Yankton - DC Redundancy	MN	50872	Reconfigure EEE and install second battery.	Mitigate TPL-001-5 P5 contingency.	NERC TPL Redundancy DC System	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
NSP Cherry Creek - DC Redundancy	MN	50871	Split primary and secondary DC circuits, install second battery at Cherry Creek substation.	Mitigate TPL-001-5 P5 contingency.	NERC TPL Redundancy DC System	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
NSP Colvill - DC Redundancy	WI	50870	Install additional DC panel, separate DC circuits, install battery monitoring for Colvill substation.	Mitigate TPL-001-5 P5 contingency.	NERC TPL Redundancy DC System	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
NSP Eastwood - DC Redundancy	MN	50868	Install second battery at Eastwood substation.	Mitigate TPL-001-5 P5 contingency.	NERC TPL Redundancy DC System	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
NSP Fort Ridgely - DC Redundancy	MN	50866	Install additional DC Panels to separate DC circuits, install battery monitoring at Fort Ridgely.	Mitigate TPL-001-5 P5 contingencies.	NERC TPL Redundancy DC System	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
NSP Gleason Lake - DC Redundancy	MN	50865	Install second battery at Gleason Lake substation.	Mitigate TPL-001-5 P5 contingency.	NERC TPL Redundancy DC System	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
NSP Long Lake - DC Redundancy	MN	50864	Expand EEE and install second battery at Long Lake	Mitigate TPL-001-5 P5 contingency.	NERC TPL Redundancy DC System	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
NSP Tremval - DC Redundancy	WI	50863	Install additional DC panel, separate DC circuits and install battery monitoring at Tremval substation.	Mitigate TPL-001-5 P5 contingency.	NERC TPL Redundancy DC System	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
NSP Stone Lake - DC Redundancy	MN	50862	Install second battery at Stone Lake substation. Split Primary and Secondary DC circuits.	Mitigate TPL-001-5 P5 contingency.	NERC TPL Redundancy DC System	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
NSP Eau Claire - DC Redundancy	WI	50861	Install battery monitoring and separate DC circuits in Eau Claire Substation	Mitigate TPL-001-5 P5 contingency	Non-MN project	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
NSP Red Cedar - DC Redundancy	MN	50860	Install a second battery at Red Cedar	Needed to mitigate TPL-001-5 P5 contingency.	NERC TPL Redundancy DC System	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
NSP Zumbrota Area Distribution Substation	MN	50857	Install a new distribution substation near Zumbrota.	Existing Zumbrota substation does not have the space for expansion to serve load growth in the area and a 69kV bus tie to split the lines that would be required for reliability.	New Load Interconnection	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None

NSP Eau Claire - Truax 69kV Rebuild	WI	50856	Rebuild a 1.5-mile segment of 69kV line between Eau Claire and Truax substations. Add OPGW to line.	Age and condition rebuild of structures on 69kV line between Eau Clarie and Truax. Addition of OPGW to the line.	Non-MN project	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
NSP Bird Island - Minnesota Valley 69kV Rebuild	MN	50854	Rebuild up to 37-miles of 69kV line between Bird Island and Minnesota Valley substations.	Age and condition replacement of structures and addition of OPGW to line.	End of life	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
NSP Wilmarth - Franklin 115kV Upgrade	MN	50846	Rebuild up to 55.1-miles of 115kV Line 0837 between Wilmarth and Franklin substations	Portions of the line are at end of life. Line frequently has congestion issues.	End of life	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
NSP Black Dog - Southtown 115kV Rebuild	MN	50845	Rebuild a 6.8-mile segment of 115kV line between Black Dog to Cedarvale to Southtown substations. This project would also install new OPGW fiber shield wire on a 7.8-mile segment of the line.	Replace aging transmission line structures with decaying foundations in challenging river bottom terrain. Enhance infrastructure reliability, add fiber communication capabilities, and mitigate potential wildfire risks	End of life	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
NSP Cashton Substation Rebuild	WI	50843	Install new Cashton area distribution substation.	New substation being built to replace existing Cashton substation that is showing age and condition signs of degradation and is unable to be expanded.	Non-MN project	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
NSP Mondovi Substation	MN	50840	Replacing the existing Naples substation with the new Mondovi substation.	The Naples substation is over capacity and requires substation reconstruction. The project solves Naples' capacity, and brings the area to the NSPW 23.9kV standard, and mitigate risk on the Sumner substation.	End of life	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
NSP Southtown Substation ELR Upgrade	MN	50838	Replace TR03 - 115/13.8kV Replace a total of 9 oil circuit breakers and associated protection relays Upgrade additional protection relaying for feeders Replace all the feeder reactors Rebuild the TR3 transformer containment wall.	Substation equipment is at end of life and has reliability concerns.	Distribution transformer, non-HVTL	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
NSP Eau Claire - Sterling 69kV structure replacement	MN	50837	Replace seven (7) structures on the 0.4-mile long segment of 69kV Line Eau Claire - Madison near Eau Claire substation.	Structures are 55-77 years old and are showing age and condition defects.	End of life	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
NSP Catawba Area Substation	WI	50831	Install new Catawba area distribution substation to replace existing Catawba substation that is experiencing age and condition degradation.	Existing Catawba substation is experience age and condition degradation and doesn't have space for expansion.	Non-MN project	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
NSP Maynard TR1 Replacement	MN	50827	End-of-life project to replace the Maynard Transmission substation TR01 transformer	End-of-life project to replace the Maynard Transmission substation TR01 transformer showing signs of degradation.	End of life	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
NSP Black Dog - Burnsville 115kV Rebuild	MN	50825	End-of-life replacement (ELR) project to rebuild a 3.4-mile segment of 115kV Line Black Dog - Burnsville.	End-of-life replacement (ELR) project to rebuild a 3.4-mile segment of 115kV Line between Black Dog to Riverwood to GRE Burnsville substations. This project would also install OPGW fiber shield wire.	End of life	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
NSP Stanley - Bateman 69KV Rebuild	MN	50824	Replace insulators and address priority defects on a 16.7-mile segment of single-circuit 69kV Line Stanley - Bateman	Improve electrical insulation of the circuit. Reduce number of outages.	End of life	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
NSP Lester Prairie Area Substation	MN	50823	Retire existing Lester Prairie and Winsted distribution substations and build a new distribution substation around the Lester Prairie area.	Winsted and Lester Prairie are starting to show signs of age-related degradation and do not have space to expand. The new substation will serve the existing load from both substations.	End of life	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
NSP Koch Cap Bank Replacement	MN	50821	Upgrade 115kV Cap bank, breaker, and protection relays at Koch substation due to end-of-life.	The capacitor bank and breaker are highly utilized equipment. Due to their age and condition, it is recommended to replace to reduce failure concerns. The protection relying on the bank is also obsolete and needs to be upgraded to the current standard of protection	End of life	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None

NSP Douglas County 115kV Cap Bank Replacement	MN	50820	Upgrade the 115kV capacitor bank, breaker, and protection relaying at Douglas County	The 115kV capacitor bank, breaker, and relaying are of obsolete design and are experiencing age and condition degradation.	End of life	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
NSP Arden Hills - Lexington Rebuild	MN	50819	Rebuild 0.85-miles of single-circuit 115kV Arden Hills - Lexington	End of Life - Existing wood pole structures are 56 years old and are approaching end of useful service life	End of life	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
NSP Yellow River Substation Rebuild	MN	50816	Install a new Yellow River area two-transformer bank distribution substation and retire existing Yellow River sub	Existing Yellow River substation is at end of life and needs substantial equipment replacement.	End of life	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
NSP Mankato Area 115kV Rebuilds	MN	50815	Upgrade 115kV line South Bend - Northport - Wilmarth. Upgrade 115kV line 5544, Wilmarth - Eastwood. Rebuild & reconductoring to include OPGW installation.	Addresses overloads showing up under sensitivity cases. Mitigates existing congestion issues on Wilmarth-Eastwood line.	Area load growth	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
NSP Rest Lake - Presque Isle Upgrades	MI; WI	50761	Build new Chain of Lakes 34.5kV substation to replace end of life Rest Lake substation. Build new Boot Lake substation to accommodate load growth at Presque Isle. Build new 34.5kV line from Chain of Lakes to Boot Lake.	End of life and load growth exceeding capability of existing distribution substations requires construction of new substations with a new 34.5kV line connecting them to mitigate contingency risk to load.	34.5 kV transmission does not meet definition of HVTL for report inclusion. Non-MN project	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None
NSP Ashland to Ironwood 88kV	WI	18008	Rebuild and relocate Bayfront to Norrie 88kV Rebuild and relocate Gingles to Hurley 115kV	Rebuild of existing lines needed to remediate reliability concerns due to aging condition of lines. New right of way needed due to severe environmental and access issues	Non-MN project	No detailed documents provided to MISO. Refer to "Project Description" and "System Need" fields from MTEP Project Portal.	None