

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben
Hwikwon Ham
Audrey C. Partridge
Joseph K. Sullivan
John A. Tuma

Chair
Commissioner
Commissioner
Commissioner
Commissioner

In the Matter of the 2025 Biennial Transmission
Projects Report

SERVICE DATE: August 12, 2025

DOCKET NO. E-999/M-25-99

The above-entitled matter has been considered by the Commission and the following disposition made:

- 1. Approved the request from the Minnesota Department of Commerce, Division of Energy Resources for funding up to \$300,000 to seek specialized technical professional services for assistance in review of the upcoming November 3, 2025 Biennial Transmission Plan and the associated Grid Enhancing Technologies study in this docket.**
- 2. Directed the Department to obtain further approval from the Commission if the Department anticipates costs will exceed the proposed \$300,000 budget.**
- 3. Approved the cost assessment under Minn. Stat. § 216B.62, subs. 5, 5a, and 8, to ensure the assessment mechanism appropriately reflects the range of entities in the MTO.**

The Commission agrees with and adopts the recommendations of the Department of Commerce, which are attached and hereby incorporated into the Order.

BY ORDER OF THE COMMISSION

Juan Coleman for

Mike Bull
Acting Executive Secretary



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July 24, 2025

Mike Bull
Interim Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: In the Matter of the 2025 Biennial Transmission Projects Report
Docket No. E999/M-25-99

Re: Department Request to seek additional funding

Dear Mr. Bull:

The Minnesota Department of Commerce (Department) writes to seek authorization under Minn. Stat. § 216B.62, subd. 8 from the Minnesota Management and Budget to incur costs for specialized technical professional services. The Department requires specialized technical professional services for assistance in review of the upcoming November 3, 2025 Biennial Transmission Plan in this docket. The Department expects 14 utilities to file a single plan. The single plan will review in excess of 150 different transmission inadequacies, some of which will have received detailed review at MISO and some will not have risen to the level of MISO review. The Department does not intend to re-review MISO-reviewed projects, but rather to review the parts of the plan that have not done so. In addition, a subset of the 14 utilities will have to file evaluation of grid enhancing technologies (GETs) as a solution for areas of forecasted high congestion. A thorough review of the anticipated information will require engineering expertise and staff time that the Department does not possess.

Regarding staff time, examples of proceedings that will require Department planning staff time while the 2025 Biennial Transmission Plan is on-going (between November 2025 and March 2026) include:

- Northern States Power Company d/b/a Xcel Energy's (Xcel) rate case (Docket No. E002/GR-24-320);
- Integrated Distribution Plans of Xcel (E002/M-25-142), Otter Tail Power Company (E017/M-25-141), Minnesota Power (E015/M-25-140), and Dakota Electric Association (E111/M-25-139);
- Integrated Resource Plans of Minnesota Municipal Power Agency and Minnkota Power Cooperative (docket numbers have not been established);
- the 9 dockets¹ related to the Long Range Transmission Plan (LRTP) Tranche 2.1 projects, specifically notice plans, exemption requests, and/or completeness reviews will be taking place;

¹ Docket Nos. E017,E015,ET2/CN-25-109; E015,ET2,E017/CN-25-111; E002, ET2, E015, E017, ET6135/CN-25-116; E002, ET6675/CN-25-117; ET6675/CN-25-118; E002, ET2, ET6675/CN-25-119; E002,ET3, ET9,E299/CN-25-120; ET3/CN-25-121 and E002/CN-25-122.

- examples of other proceedings may also be on-going include:
 - the Appleton—Benson transmission line certificate of need (CN) (ET2,E017,ET6135, E100/CN-24-263);
 - Xcel’s 2023 wind development-transfer Request For Proposals (RFP) (Docket No. E002/M-23-342);
 - Xcel’s 2024 wind, solar, and storage RFP (Docket No. E002/M-24-230);
 - Minnesota Power’s 2024 wind RFP (docket number has not been established); and
 - Otter Tail Power’s wind RFP projects to be on-line by 2029 (docket number has not been established).

Regarding expertise, the Department currently does not have staff with expertise in transmission modeling and related analysis. The Department intends to hire outside experts to review technical details of the GETs plans and a sample of the inadequacies that have solutions that are not large enough to go through a certificate of need process but whose solutions could have significant impacts, either financial or on the local communities. The specific projects to be analyzed cannot be known at this time. Broadly speaking, the Department’s goals for the professional technical services will be to 1) create more transparency regarding significant congestion being experienced in Minnesota, and 2) help build Department expertise regarding how such projects should be developed by the utilities and how they can be analyzed after a petition is filed.

The Department has developed an estimated budget for the outside experts based upon experience in past proceedings, such experts hired to review integrated distribution plans in 2023. At this time the estimated budget for the outside experts is \$300,000.00. This amount may change based upon factors encountered in the Department’s Request for Proposals for the professional technical services. However, based upon past experience with using consultants, the Department considers cost control—for example, through insisting consultants stick to the agreed upon scope of work—to be important. In addition, the time frame established under Minnesota Rules 7848.1800 places limits on how long the consultants will be used. This timeframe will, indirectly, create a limit the costs that can be incurred. Finally, additional cost limits are created by the fact that the outside experts are not viewed as a permanent solution to be relied upon every two years. Instead, they will be used as a bridge to greater Department involvement in future biennial transmission plans.

The Department requests that the Commission place this request on the consent agenda. The Department intends to have these professional technical services in place before the November filings to make the best use of the comment period established by Minnesota Rules.

Sincerely,

/s/ Sydnie Lieb, Ph.D.

Assistant Commissioner, Division of Energy Resources

PT/ad

CERTIFICATE OF SERVICE

I, Robin Benson, hereby certify that I have this day, served a true and correct copy of the following document to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States mail at St. Paul, Minnesota.

Minnesota Public Utilities Commission ORDER

Docket Number: **E-999/M-25-99**

Dated this **12th** day of **August, 2025**

/s/ Robin Benson

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402- 4400 United States	Electronic Service		No	Official 25-99
2	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 25-99
3	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 25-99
4	Ian M.	Dobson	ian.m.dobson@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	Official 25-99
5	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	Official 25-99
6	David R.	Moeller	drmoeller@fredlaw.com	Fredrikson & Byron, P.A.		60 S 6th St Ste 1500 Minneapolis MN, 55402- 4400 United States	Electronic Service		No	Official 25-99
7	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	Official 25-99
8	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180- 07-MCA Minneapolis MN, 55401- 1993 United States	Electronic Service		No	Official 25-99
9	Julia	Selker	jselker@gridstrategiesllc.com	WATT Coalition		110 Allen St Suite A&B Cumming GA, 30040 United States	Electronic Service		No	Official 25-99
10	Adam	Sokolski	adam.sokolski@edf-re.com	EDF Renewable Energy		10 Second Street NE Ste 400 Minneapolis MN, 55410 United States	Electronic Service		No	Official 25-99