

January 16, 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.
MPUC Docket No. E999/M-25-99**

Dear Ms. Bergman:

The Minnesota Transmission Owners (“MTO”) respectfully submits this response to the Minnesota Public Utilities Commission’s (“MPUC”) Request for Information issued on December 22, 2025 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
INFORMATION REQUEST RESPONSE**

- Public Document**
- NONPUBLIC Document – Not For Public Disclosure**
- Public Document – Nonpublic Data Has Been Excised**

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: December 22, 2025 Response Due Date: January 16, 2026

IR#1 Provide all documents, including modeling, for every project for which grid enhancing technology was considered as an alternative within the 2025 Biennial Transmission Projects Report.

RESPONSE: The Minnesota Transmission Owners (MTO) provide the following responses. Some MTO utilities did not have any information or direct response to this information request.

Below are specific responses from individual utilities or as noted supported by individual utilities.

Dairyland Power Cooperative

While DPC did not consider specific GETs as alternatives to our projects within the 2025 Biennial report, DPC has implemented GETs such as ambient adjusting our transmission ratings and also reconfiguring our system topology on a case-by-case basis.

East River Electric Power Cooperative

East River did not consider any GET project alternatives within the 2025 Biennial Transmission Projects Report and has not proposed any GET projects to MISO.

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Great River Energy

GETs are hardware or software that reduces congestion or enhances the flexibility of the transmission system by increasing the capacity of a high-voltage transmission line or rerouting electricity from overloaded to uncongested lines, while maintaining industry safety standards. Grid enhancing technologies include but are not limited to dynamic line rating, advanced power flow controllers, and topology optimization.

While GRE continues to explore opportunities to utilize Grid-Enhancing Technologies (GETs) as congestion mitigation solutions and has implemented them at several locations within the transmission system, the majority of projects in the Biennial Plan focus on addressing various load-serving reliability concerns rather than congestion mitigation. As a result, GETs are generally not applicable to these projects.

GRE has deployed GETs, such as Dynamic Line Rating (DLR) sensors, at the following locations:

1. Inman – Rush Lake 115 kV line
2. Benton County – Mud Lake 230 kV line
3. Blaine – Linwood 230kV line
4. Bunker Lake – Blaine 230 kV line
5. Crooked Lake – Parkwood 115 kV line
6. Mud Lake – Riverton 230kV line
7. Johnson Junction – Morris 115kV line
8. Linwood – Rush City 230 kV line
9. Pleasant Valley – North Austin
10. Rush lake – Perham SE 115 kV line

ITC Midwest (supported by Missouri River Energy Services)

In general, ITC Midwest considers the use of GETs for all its projects, including those in the 2025 Biennial Transmission Projects Report. However, ITC Midwest did not choose to utilize GETs for any of these projects due to the project need driver and because of that, ITC Midwest does not have any modeling or other information or documentation it can provide as GETs was ruled out early in the evaluation process for these projects. GETs were not chosen for any of the ITC Midwest projects due to the need driver of the projects predominantly being age and condition or similar type projects. In general, the use of GETs is driven by the need to increase the thermal rating/loading capability on the upgraded transmission facility, which was not the need driver for the ITC Midwest projects in the 2025 Biennial Transmission Projects Report.

L&O Power Cooperative

L&O Power Cooperative did not consider GETs for its projects in the 2025 Biennial Transmission Projects Report.

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Minnesota Power

Grid-enhancing technology is not specifically mentioned as an alternative for any of the MP projects in Section 6.4 of the Biennial Report.

Minnkota Power Cooperative

Minnkota inherently considers all reasonable solutions as part of our transmission planning process, including GETs. In the case of the projects included in the 2025 Biennial report, GETs were not considered a reasonable solution.

Otter Tail Power

For the projects included in the 2025 Biennial Transmission Projects Report, Otter Tail did not select GETs because the primary project need drivers did not align with the purposes for which GETs are typically effective. Specifically, Otter Tail's non-LRTP projects submitted in the 2025 Biennial Transmission Projects Report were strictly related to load serving and generator interconnection facilities, where GETs generally do not provide meaningful benefit. As a result, GETs were ruled out early in the evaluation process, and Otter Tail does not have modeling, analyses, or other documentation to provide for these projects.

Xcel Energy

In general, Xcel Energy evaluates the potential use of GETs for all its projects, including those in the 2025 Biennial Transmission Projects Report. However, for the projects included in that report, Xcel Energy did not select GETs because the primary project need drivers did not align with the purposes for which GETs are typically effective. As a result, GETs were ruled out early in the evaluation process, and Xcel Energy does not have modeling, analyses, or other documentation to provide for these projects.

Most of the projects were driven by age, condition, or similar asset focused needs, where GETs generally do not provide meaningful benefit. In cases where increasing thermal ratings or loading capability could have been relevant, GETs were still not selected due to factors such as the magnitude of the required rating increase or physical configuration constraints that made traditional solutions more viable.

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IR#2 What project alternative documents were provided to MISO?

RESPONSE: The Minnesota Transmission Owners (MTO) provide the following responses. Some MTO utilities did not have any information or direct response to this information request, including that they are not in MISO. Also, some utilities combined their responses to Information Requests Nos. 1 and 2.

Dairyland Power Cooperative

DPC does not provide alternative documents to MISO, but other stakeholders may propose project alternatives as part of the MTEP process.

Great River Energy

Typically, transmission owners evaluate multiple alternatives to identify the best-value option to submit to MISO. In rare cases, different transmission owners may propose alternative solutions for the same issue, and MISO would then review and select the most cost-effective option to move forward. In general, and specifically for GRE's projects in the Biennial Plan, no transmission alternatives were provided to MISO by GRE or other transmission owners for these projects.

Minnesota Power

No project alternative documents were provided to MISO relating to grid-enhancing technology.

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IR#3 What is MISO's acceptance, review, and approval process for the expedited project review compared to MTEP?

RESPONSE: The Minnesota Transmission Owners (MTO) provide the following general response.

The MISO EPR process is used to seek MISO approval in an expedited manner for projects that, typically due to the requested/required in-service date, need MISO approval in a manner quicker than the normal MTEP process provides. The normal MTEP process is a ~15-month process from project submittal to MISO approval, and the EPR process provides a path to MISO approval in a process that can be as quick as 2 months from submittal to MISO approval.

MISO's Transmission Planning Business Process Manual (BPM-020) lays out the MTEP and EPR processes.

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