

November 14, 2019

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: Completeness Comments of the Minnesota Department of Commerce, Division of Energy Resources
Docket No. E999/M-19-205

Dear Mr. Wolf:

The Minnesota Department of Commerce, Division of Energy Resources (Department) reviewed the 2019 Minnesota Biennial Transmission Projects Report (Report) for compliance with Minnesota Rules 7848.1300 and the Minnesota Public Utilities Commission's (Commission) June 12, 2018 Order on the 2017 Biennial Transmission Projects Report.¹ The Department has reviewed the Report and concludes that most of the required information is located either in the Report or in the referenced Midcontinent Independent System Operator (MISO) Transmission Expansion Plans.

Additionally, Minn. Stat. § 216B.2425, subds. 2(e) and 8 requires certain utilities² to include a distribution study for distributed generation in the Biennial Transmission Projects Report. The Department notes that Xcel Energy submitted, separately from the Report, the required distribution study (filed as the "Integrated Distribution Plan") in Docket No. E002/M-19-666 on November 1, 2019. The Commission has issued a notice in that docket setting forth the comment deadlines in that proceeding; therefore, these completeness comments pertain only to the Report and do not address the distribution study submitted in Docket No. E002/M-19-666.

As addressed during the completeness review of the 2013, 2015, and 2017 Biennial Transmission Projects Reports, Minnesota Rules 7848.1300 B requires "a copy of the most recent regional load and capability report of the Mid-Continent Area Power Pool [MAPP] or other appropriate regional reliability council." As MAPP has not prepared a Load and Capability Report since May 2009, and in fact no longer exists as of October 2015, the Report included information from the MISO Transmission Expansion Plan (MTEP) report instead.

¹ See the Commission's Order in Docket E-999/M-17-377.

² Xcel Energy is the only utility currently affected by the provision codified at Minn. Stat. § 216B.2425, subds. 2(e) and 8 for the 2017 Minnesota Biennial Transmission Projects Report.

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While the MTEP report is a useful report for transmission planning, the Department noted in its completeness comments for the 2013, 2015, and 2017 Biennial Transmission Projects Reports that a report that more closely complies with the statutory requirement that a regional load and capability report be submitted is the Midwest Reliability Organization's (MRO) load and capability report. This report is available via the North American Electric Reliability Corporation's (NERC) 2018 Long-Term Reliability Assessment. Therefore, the Department recommends that the Commission declare the Report complete upon submission of the MRO section of the NERC 2018 Long-Term Reliability Assessment.

Minnesota Rules 7848.1800 subpart 6 requires a "recommendation on what procedural framework the Commission should use to examine and act on the filing." The Department recommends that the Commission use the standard comment, reply comment procedural framework. The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ MICHAEL N. ZAJICEK
Rates Analyst

MNZ/ar

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
Completeness Comments**

Docket No. E999/M-19-205

Dated this **14th** day of **November 2019**

/s/Sharon Ferguson

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