

October 23, 2024

VIA E-FILING

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

Re: In the Matter of the Investigation into Transmission-Curtailment Matters, Drivers, and Potential Solutions to Limitations Resulting from the Nobles County Substation MPUC Docket No. E999/CI-24-316

Dear Mr. Seuffert:

Minnesota Transmission Owners (MTO) respectfully submit these comments in response to the Minnesota Public Utilities Commission's (Commission) September 23, 2024 notice (Notice) seeking comments related to potential solutions to congestion occurring in the area of the Nobles Substation in southwestern Minnesota. The Notice sought comments on six questions. The MTO defer to Xcel Energy for comprehensive responses to all of the questions but provide these comments to specifically address Question Nos. 3, 4, and 5a and c to the extent those questions seek information specifically from MTO.

Current Studies

The MTO includes 14 investor-owned, municipal and cooperative utilities that own and operate high voltage transmission lines and together file the biennial transmission report due by November 1 each odd numbered year pursuant to Minn. Stat. § 216B.2425. More information about the MTO can be found at <http://www.minnelectrans.com>. In response to Question No. 3 from the Notice, the MTO is not currently engaged in any studies assessing the congestion and curtailment issues effecting the grid in southwestern Minnesota.

In addition to the efforts Xcel Energy has underway, the MTO is aware of two ongoing studies assessing current congestion in southwestern Minnesota, one by the Midcontinent Independent System Operator (MISO) and another by the Grid North Partners. Each is described below.

First, MISO conducted a near-term market congestion planning study in MTEP24 to identify transmission solutions to address congestion, with a focus on understanding the economic impact of various sequences of the construction-related Long Range Transmission Plan (LRTP) Tranche 1 outages. MISO's initial finding is that incorporating LRTP Tranche 1 construction outages will increase congestion and curtailment in the short-term. MISO performed further analysis on sequence 1 results, developed and analyzed additional outage scenarios, and continued internal and external coordination. MISO's next steps involve soliciting recommendations from stakeholders for grid enhancing technologies (GETs) solutions and then to meet directly with transmission owners to share economic issues identified from Tranche 1 construction and discuss possible GETs solutions. MISO will continue to share scope updates and study results throughout

the 2024 MISO Planning Sub-Committee (PSC) meetings. The latest study results are shown in the July 24th PSC meeting presentation.

Second, in 2024, Minnesota passed legislation requiring transmission owners with more than 750 miles of transmission in Minnesota to perform a congestion study (Minnesota GETs Study) and document the results of the study in the Minnesota Biennial Transmission Report due November 1, 2025. The legislation requires consideration of solutions including GETs and increasing the capacity of line and substation facilities.

Many of the MTO members are coordinating to conduct the Minnesota GETs Study. The intent is for all of Grid North Partner utilities¹ along with ITC Midwest and Minnkota Power Cooperative, to perform the study. After the analysis is complete and any GETs are identified, Grid North Partners will determine the project scope and overall cost. The study area will be the region in and around Minnesota which will includes the grid in southwestern Minnesota.

The schedule for this Grid North Partners' Minnesota GETs Study is as follows:

- Conduct research of historical market congestion and conduct near-term analysis by mid-December 2024;
- Identify and test possible GETs and other solutions in the first and second quarters of 2025;
- Include Minnesota GETs Study report in the 2025 Biennial Transmission Report and submit to the Commission by November 1, 2025.

The Grid North Partners are taking the lead in the Minnesota GETs Study, and Great River Energy and Xcel Energy are conducting the actual analysis behalf of the other participants.

Update on Previously Reported Studies

The Notice requested updates regarding certain previously reported initiatives. An update on MISO's 2023 Informational Market Congestion Study was discussed above.

Additionally, MISO LRTP Tranche 2 projects are currently being reviewed with an expected approval at the end of 2024. MISO's planning process for Tranche 2 began in January 2023 and has included hundreds of meetings and multiple requests for stakeholder input, with more than 500 changes made to the Futures and 97 stakeholder-submitted alternatives considered. The LRTP Tranche 2.1 portfolio consists of 23 projects, including underlying projects for a total collective

¹ Grid North Partners consists of 10 Minnesota investor-owned, municipal and cooperative utilities (all of which are also MTO members) including: Central Municipal Power Agency/Services, Dairyland Power Cooperative, Great River Energy, Minnesota Power, Missouri River Energy Services, Otter Tail Power Company, Rochester Public Utilities, Southern Minnesota Municipal Power Agency, WPPI Energy and Xcel Energy.

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estimated cost of \$21.8B. MISO's identified Project 22: Big Stone South - Brookings County - Lakefield Junction 765 kV provides direct connections in the Buffalo Ridge area and, coupled with the other 765 kV and 345 kV projects, provides significant additional outlet capability from the Buffalo Ridge area with energy delivery paths MISO wide.

The next step in the Tranche 2.1 approval timeline is the substantive stakeholder feedback process for the MTEP24 report. This includes the final stakeholder input at the November 8, 2024 Planning Advisory Committee meeting where there will be feedback and a motion for approval. This will be followed by more feedback and a possible motion at the November 19, 2024 MISO System Planning Committee and then the full Board of Directors approval at the December 12, 2024 meeting.

Conclusion

MTO does not plan to file reply comments or further participate in this docket but is available should the Commission have questions specific to the MTO's efforts.

These comments have been e-filed through www.edocket.state.mn.us. A copy of this filing is also being served upon the persons on the Official Service List of record.

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

Sincerely,

FREDRIKSON & BYRON, P.A.

A handwritten signature in black ink, appearing to read 'CHB', followed by a horizontal line.

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Transmission-Curtailment Matters, Drivers,
and Potential Solutions to Limitations Resulting
from the Nobles County Substation**

MPUC Docket No. E999/CI-24-316

CERTIFICATE OF SERVICE

Maia Martinez certifies that on the 23rd day of October, 2024, she e-filed true and correct copy the comments on behalf of Minnesota Transmission Owners via eDockets (www.edockets.state.mn.us):

Said documents were also served as designated on the Official Service Lists on file with the Minnesota Public Utilities Commission and as attached hereto.

Executed on: October 23, 2024

Signed: /s/ Maia Martinez

Fredrikson & Byron, P.A.

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