

Rebuttal Testimony and Schedules
Jason T. Standing

Before the Minnesota Public Utilities Commission
State of Minnesota

In the Matter of the Application of Northern States Power Company d/b/a Xcel Energy
for a Certificate of Need for Additional Dry Cask Storage at the
Prairie Island Nuclear Generating Plant Independent Spent Fuel Storage Installation

Docket No. E002/CN-24-68
Exhibit____(JTS-1)

Transmission

March 17, 2025

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I. INTRODUCTION

Q. PLEASE STATE YOUR NAME AND TITLE.

A. My name is Jason Standing. I am the Manager for Transmission Planning for Xcel Energy Services, Inc. (XES), the service company affiliate of Northern States Power Company-Minnesota, doing business as Xcel Energy (Xcel Energy or the Company).

Q. PLEASE DESCRIBE YOUR QUALIFICATIONS AND EXPERIENCE.

A. I obtained a B.S. in Electrical Engineering from North Dakota State University, Fargo, North Dakota in 1999. In 2011, I obtained a Master of Business Administration from the University of Minnesota, Minneapolis, Minnesota. I received my Professional Engineer license from the State of Minnesota in 2012.

I have worked for XES since 2004 in the transmission area. I have been in my current position since 2019. My current responsibilities include managing the Transmission Planning Department for Xcel Energy, which includes Northern States Power Company-Minnesota and Northern States Power Company-Wisconsin. Prior to joining XES, I was an engineer in various roles for different companies. In these various roles, I have had roles of increasing responsibility in distribution planning, system protection, substation design, field engineering, and project management. My Statement of Qualifications is provided as Exhibit____(JTS-1), Schedule 1.

Q. HAVE YOU PREVIOUSLY PROVIDED TESTIMONY IN THIS PROCEEDING?

A. No, I have not.

1 Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

2 A. My Rebuttal Testimony responds to the Direct Testimony filed by the
3 Minnesota Department of Commerce -- Division of Energy Resources
4 (Department), the only other party filing testimony in this matter. Specifically,
5 I respond to the Direct Testimony of Department witness Ari Zwick
6 regarding the Company's compliance with Minn. Stat. § 216B.2425, subd. 7.

7
8 **II. COMPLIANCE WITH MINN. STAT. § 216B.2425, SUBD. 7**

9
10 Q. WHAT DID DEPARTMENT WITNESS ZWICK TESTIFY WITH RESPECT TO THE
11 COMPANY'S COMPLIANCE WITH MINN. STAT. § 216B.2425, SUBD. 7?

12 A. Department witness Zwick testified that based on information set forth in the
13 2023 Biennial Transmission Report (MPUC Docket No. E999/M-23-91)
14 provided to the Commission by the Minnesota Transmission Owners (MTO)
15 as well as the Company's 2024-2040 Upper Midwest Integrated Resource Plan
16 (2024 IRP), he could not conclude that the Company is in compliance with
17 Minn. Stat. § 216B.2425, subd. 7. Zwick Direct at p. 15.

18
19 Q. WHAT DOES MINN. STAT. § 216B. 2425, SUBD. 7 REQUIRE?

20 A. Minn. Stat. § 216B.2425, subd. 7 provides that "[e]ach entity subject to this
21 section shall determine necessary transmission upgrades to support
22 development of renewable energy resources required to meet [the renewable
23 energy] objectives under section 216B.1691 and shall include those upgrades
24 in its report under subdivision 2." Subdivision 2 refers to the Biennial
25 Transmission Report.

26
27 Q. DID THE BIENNIAL TRANSMISSION REPORT IDENTIFY A SHORTFALL WITH
28 RESPECT TO TRANSMISSION?

1 A. No. Witness Zwick's testimony focuses on Table 2 at p. 223 of the Biennial
2 Transmission Report. *See* the Department's response to Xcel Energy's
3 Information Request No. 1, provided as Exhibit___(JTS-1), Schedule 2.
4 Table 2 is a part of a "Gap Analysis" included in the Biennial Transmission
5 Report. Table 2 indicates that, at the time of that report submittal, the
6 Company was expected to be 108.5 megawatts (MW) short of meeting its
7 renewable energy standard (RES) requirements in 2035. This testimony does
8 not indicate a *transmission* capacity deficit, as witness Zwick incorrectly stated
9 in his testimony at p. 15.

10
11 Q. DID WITNESS ZWICK PROVIDE ANY ADDITIONAL INFORMATION REGARDING
12 THIS TESTIMONY?

13 A. Yes. Witness Zwick responded to an information request on this topic. *See*
14 Schedule 2. Witness Zwick indicates that the Department uses the Gap
15 Analysis in the Biennial Transmission Report as an indication of gaps in
16 available transmission capacity. Witness Zwick, in his IR response, also asks
17 about transmission capacity to meet the carbon-free standard (CFS)
18 requirement.

19
20 Q. DOES THE COMPANY CONTINUE TO ANTICIPATE A SHORTFALL IN
21 GENERATION CAPACITY NEEDED TO COMPLY WITH THE RES IN 2035?

22 A. No. Notably, the Biennial Transmission Report was filed before the 2024 IRP
23 was filed. And, as noted in witness Zwick's testimony at p. 10, the Company
24 has demonstrated RES compliance through 2040 in its 2024 IRP. Witness
25 Zwick further indicates that because the 2024 IRP Settlement Agreement,
26 which has now been approved, includes renewable capacity additions that are
27 the same or higher compared to the amounts identified in the 2024 IRP, he

1 has “no concerns” about Xcel Energy’s ability to meet its RES compliance
2 requirements.

3
4 Q. WHAT IS THE STATUS OF THE COMPANY’S COMPLIANCE WITH THE CFS
5 REQUIREMENT?

6 A. As witness Zwick notes on pp. 13-14, there are no compliance requirements
7 for the CFS requirement until 2030. Witness Zwick also notes that the 2024
8 IRP Preferred Plan and the Settlement Agreement both appear to address CFS
9 compliance from now through 2040.

10
11 Q. IN YOUR OPINION, IS THE COMPANY IN COMPLIANCE WITH § 216B.2425, SUBD. 7?

12 A. Yes. The Company included the transmission upgrades necessary to meet its
13 obligations under Minn. Stat. § 216B.1691 in the 2023 Biennial Transmission
14 Report, as required by section 216B.2425, subd. 7. The Company engages in
15 long-range transmission (LRT) planning through the Midcontinent
16 Independent System Operator (MISO) LRT Tranche 1 and 2 planning
17 processes. MISO Tranche 1 projects are slated for implementation by 2031,
18 and MISO Tranche 2 projects are slated for implementation by 2035. The
19 Company has filed Certificates of Need for a number of transmission projects
20 included in Tranche 1¹ and has filed Notice of Intent (NOI) letters for the
21 Tranche 2 projects.² In addition, we are pursuing transmission investments to
22 allow us to re-utilize the available interconnection at the retiring Sherco and
23 King plants, allowing for the interconnection of new renewable resources. As

¹ See MPUC Docket Nos. E002/CN-22-532; E002, E017, ET2, E015, ET10/CN-22-538; PSCW Docket Nos. 5-CE-157; 5-CE-158 .

² See Notices of Intent in MPUC Docket Nos. E002, ET2, E015, E017, ET6135/CN-25-116; E002, ET6675/CN-25-117; E002, ET2, ET6675/CN-25-119; E002, ET3, ET9, E299/CN-25-120; E002/CN-25-122.

1 set forth in the 2024 IRP, the Company is on track to comply with all of the
2 various generation capacity requirements covered by Minn. Stat. § 216B.1691.
3 Further, based on its participation in the MISO LRT Tranche 1 and 2 projects
4 and planned transmission investments to re-utilize existing interconnection
5 rights, the Company does not anticipate any transmission shortfall with
6 respect to the generation required under the requirements included in Minn.
7 Stat. § 216B.1691.

8
9 **III. CONCLUSION**

10
11 Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

12 A. Yes, it does.

Jason T. Standing

SUMMARY

Degreed Electrical Engineer experienced in management in government, commercial, and utility markets. Capable of satisfying customer needs and expectations through creative engineering problem solving techniques and accurate communications.

PROFESSIONAL EXPERIENCE

Xcel Energy, Minneapolis, MN 2019-current

Manager Transmission Planning, NSP/NSPW

- Lead a team of transmission experts to develop long-term plans to ensure reliable transmission operations
- Coordination of diverse groups of contributors to develop regional and local plans
- Serve as expert witness in state permitting and regulatory process
- Develop future planning tools and processes to help with the grid of the future

Xcel Energy, Minneapolis, MN 2015-19

Principal Transmission Planning Engineer

- Lead Transmission Planning engineer for the Twin Cities area
- Responsible for training new Transmission Planning engineers
- Involved in local and regional policy with states and RTOs
- Develop computer programming skills and incorporate into Transmission Planning

Xcel Energy, Minneapolis, MN 2014-15

PROMOD Planning Engineer

- Provide Production Cost Modeling for the NSP area
- Evaluate transmission project impacts to generation
- Congestion analysis

Xcel Energy, Minneapolis, MN 2004-14

Senior Specialty Transmission Planning Engineer

- Responsible for leading and improving the Constructability I process for which all new transmission projects must be approved through
- Lead Technical expert for the Hiawatha Certificate of Need
- Lead the MISO MTEP process for NSP and NSPW areas
- Involved with neighboring and regional entities to create cost effective solutions to the regional and bulk transmission issues
- Work closely with MISO to ensure Xcel Energy's interests are being heard through multiple working groups

Wunderlich-Malec Systems, Minnetonka, MN 2002-2003

Project Manager

- Managed the design, electrical system analysis, and procurement for substation projects
- Responsible for delivering cost analysis to the customer, preparing equipment bids, while monitoring expenses
- Provided field support for the construction team to ensure that the substation was delivered on time and to the customer's satisfaction

Design Engineer

- Lead design engineer for the American Transmission Company's new 69 kV substation
- Lead engineer responsible for accurate settings of the system protection relays
- Responsible for ensuring the NEC codes were followed
- Created new drawing sets while updating old drawing sets to ensure accuracy for the customer

Sebesta Blomberg and Associates, Roseville, MN 2000-2002

Project Engineer

- Commissioning specialist whose duties included creating test sheets for various types of electrical equipment, field visits, overseeing testing specialists at the Pentagon and other commercial sites
- Design engineer who used creative problem-solving techniques to redesign customer's 230 kV and 115 kV breaker control panels.
- Developed load flow and system protection studies

Alliant Energy, Madison, WI 1999-2000

Distribution Systems Planner

- Responsible for running load flow analysis for the southern Wisconsin electrical distribution and transmission systems
- Involved in maintaining and updating existing computer models to reflect changes to the physical system
- Prepared cost analysis reports for management

EDUCATION

B.S. in Electrical Engineering, North Dakota State University, Fargo, ND 1999

MBA, University of Minnesota, Minneapolis, MN 2011

Profession Engineer Minnesota, PE 2012

COMPUTER EXPERIENCE

PSSE, PROMOD, Synergi, SKM Power Tools, Microsoft Office

DOC Response to XE IR No. 1



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: E002/CN-24-68

Requested By: Xcel Energy

☐ Nonpublic ☒ Public

Date of Request: February 28,
2025

Date of Response: March 4, 2025

Response By: Ari Zwick

Email Address(es): ari.zwick@state.mn.us

Phone Number(s): 651-539-1675

Response to Request Number: #1(a)

Request:

On p. 14, ll. 17-18, Mr. Zwick states “However, the 2023 Transmission Report identifies a capacity shortfall of 108.5 MW in 2035 for Xcel . . .” and cites to the 2023 Biennial Transmission Report at 186. Mr. Zwick states on p. 15 at ll. 14-15 that “Xcel already stated a transmission capacity deficit to meet its anticipated RES obligation in the 2023 Transmission Report,” presumably referring back to that earlier citation. Please confirm that p. 186 is the correct citation, and if so, please provide the specific language Mr. Zwick references.

Response:

Page 186 is not the correct citation. Please refer to table 2 on page 223 of the 2023 Biennial Transmission Report.

DOC Response to XE IR No. 1



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Date of Request: February 28,
2025

Date of Response: March 4, 2025

Response By: Ari Zwick

Email Address(es): ari.zwick@state.mn.us

Phone Number(s): 651-539-1675

Response to Request Number: #1(b)

Request:

If p. 186 is not the correct citation, please confirm that the correct citation is to Table 2 on p. 223 of the 2023 Biennial Transmission Report.

Response:

Please see the Department's response to 1(a).

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Date of Request: February 28,
2025

Date of Response: March 4, 2025

Response By: Ari Zwick

Email Address(es): ari.zwick@state.mn.us

Phone Number(s): 651-539-1675

Response to Request Number:

#1(c)

Request:

If neither p. 186 or p. 223 is the correct citation to the 2023 Biennial Transmission Report, please provide the correct citation.

Response:

Please see the Department's response to 1(a).

DOC Response to XE IR No. 1



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Information Request

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Requested By: Xcel Energy

☐ Nonpublic ☒ Public

Date of Request: February 28,
2025

Date of Response: March 4, 2025

Response By: Ari Zwick

Email Address(es): ari.zwick@state.mn.us

Phone Number(s): 651-539-1675

Response to Request Number: #1(d)

Request:

Please explain the basis for Mr. Zwick's contention that the 2023 Biennial Transmission Report, specifically Table 2 on p. 223, identifies that the Company anticipates a projected *transmission* capacity deficit rather than a projected *generation* capacity deficit with respect to meeting the Minnesota Renewable Energy Standard.

Response:

Page 219 of the 2023 Biennial Transmission Report states:

Minn. Stat. § 216B.2425, subd. 7, states that in the Biennial Report the utilities shall address necessary transmission upgrades to support development of renewable energy resources required to meet the objectives set forth under Minn. Stat. § 216B.1691 (formerly the Renewable Energy Standards). In its May 30, 2008, Order approving the 2007 Biennial Report and Renewable Energy Standards Report, the Commission said, "Future biennial transmission projects reports shall incorporate and address transmission issues related to meeting the standards and milestones of the new renewable energy standards enacted at Minn. Laws 2007, ch. 3."

[...]

In this Report, similar to prior reports, the utilities are reporting on their best estimates for the amounts of renewable generation required in future years and the efforts under way to ensure adequate transmission will be available to transmit that energy to the necessary market areas. A Gap Analysis is provided to illustrate the amount of renewable generation already available and the amounts required in the future to meet the standard. (emphasis added)

Page 221 of the 2023 Biennial Transmission Report states:

A Gap Analysis is an estimate of how many more megawatts of renewable generating capacity a utility expects it will require beyond that which is presently available to obtain the required amount of renewable energy. A Gap Analysis is not an exercise intended to verify the validity of forecasted energy sales and associated

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capacity needs. It is done for transmission planning purposes only. This is the ninth time the utilities have prepared a Gap Analysis; a Gap Analysis was also prepared for the 2007, 2009, 2011, 2013, 2015, 2017, 2019 and 2021 Biennial Reports. (emphasis added)

The Department's reference to Table 2 on Page 221 utilizes the Gap Analysis of available generation needed to demonstrate RES compliance as an indication of gaps in available transmission capacity, which is the stated purpose of the Gap Analysis. Regardless of whether or not these data sufficiently inform the Company's compliance with Minn. Stat. § 216B.2425, subd. 7, the Department cannot determine at this time that the Company is compliant with Minn. Stat. § 216B.2425, subd. 7.

Note that the Biennial Transmission Report at page 225 states that a generation gap is closely tied to the need for transmission resources:

Though generally encouraged by this progress, MTO utilities emphasize that continuing progress is also closely linked to the ability to procure the necessary transmission resources, which is analyzed throughout this Report. Further, MTO utilities continue to analyze how compliance with the CFES may impact transmission needs and anticipate providing additional information in the next biennial report in 2025.

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2025

Date of Response: March 4, 2025

Response By: Ari Zwick

Email Address(es): ari.zwick@state.mn.us

Phone Number(s): 651-539-1675

Response to Request Number: #1(e)

Request:

Please explain any other bases for Mr. Zwick's contention that the 2023 Biennial Transmission Report demonstrates that the Company anticipates a projected transmission capacity deficit of 108.5 MW in 2035.

Response:

Page 221 of the 2023 Biennial Transmission Report states:

It is important to note that the data presented in this Report represents MTO members' efforts to report on metrics that are part of a regulatory construct that is evolving as a result of the 2023 legislation. The Commission is currently in the process of issuing guidance to electric utilities on implementation of the RES and SES requirements in Docket No. E999-CI-23-151. The Commission reviewed this matter during its October 19, 2023, agenda meeting, focusing on initial guidance. The Commission's written order is forthcoming. Accordingly, MTO utilities remain in the planning stages related to compliance with the Minnesota Legislature's 2023 amendments.

The Department notes that the stated 2035 capacity deficit refers to the 55% RES requirement, and not the 90% CFS requirement that is also required in 2035. While transmission capacity information regarding the CFS was not available in the 2023 Biennial Transmission Report, any updated transmission capacity information currently possessed by Xcel is also relevant to the requested compliance discussion, including the 80% CFS requirement in 2030.

In addition, as quoted in the reply to part 1(d), the Biennial Transmission Report at page 225 states that a generation gap is closely tied to the need for transmission resources.