



Working for Advanced Transmission Technologies (WATT) Coalition

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November 20, 2025

Via E-Filing

Mr. William Seuffert

Executive Secretary

Minnesota Public Utilities Commission

121 7th Place E, Suite 350

St. Paul, MN 55101

RE: In the Matter of the 2025 Minnesota Biennial Transmission Projects Report

I. Introduction

The Working for Advanced Transmission Technologies (WATT) Coalition appreciates the opportunity to provide completeness comments to the Minnesota Public Utilities Commission on the 2025 Minnesota Biennial Transmission Projects Report. These comments address the following question identified in the Commission’s Notice of Comment issued on November 10, 2025: *Is the Biennial Transmission Projects Report (Report) complete (that is, does it contain the required information as set out in MN Rule 7848.1300)?*

II. About the WATT Coalition

The WATT Coalition is a trade association focused on facilitating the adoption of advanced technologies on the US electric transmission system that improve reliability, lower costs, and enable economic development. WATT includes generation owners and developers, clean energy finance interests, and transmission owners; and technology vendors, offering expertise in Advanced Power Flow Control, Dynamic Line Ratings, and Topology Optimization. The views and opinions expressed in this filing do not necessarily reflect the official position of each of WATT’s individual members.

III. Is the Biennial Transmission Projects Report (Report) Complete (That Is, Does It Contain the Required Information as Set Out in *MN Rule 7848.1300*)?

a. List of Alternatives

Section E of *MN Rule 7848.1330* states that each biennial transmission projects report must contain “a list of all alternative means of addressing each inadequacy identified, including non-transmission alternatives.” While the Report does list non-transmission

alternatives when feasible for each of the 158 transmission inadequacies, the non-transmission alternatives do not include a single use case for Grid Enhancing Technologies (GETs). GETs are particularly well-suited to addressing thermal overloads, which is one of the identified transmission inadequacies in the Report. This omission is not in the spirit of *Minnesota Session Laws, 2024, Chapter 127, Article 42, Section 21* from which *MN Rule 7848.1330* derives its statutory authority. Subd 2(c)(2) states that the Report must “identify alternative means of addressing each inadequacy listed, including grid enhancing technologies such as dynamic line rating, power flow controllers, topology optimization, and other hardware or software that reduce congestion or enhance the flexibility of the transmission system.”

b. Public Input

Sections H, I, and J of *MN Rule 7848.1330* state that each biennial transmission projects report must contain “an account of the measures the utility took to gather public input and to involve local government officials, tribal government officials, and other interested persons in identifying transmission inadequacies and analyzing alternative means of addressing them; a report on the number of members of the public who provided input and the substance of that input; and a report on the number of local and tribal government officials who provided input, the elective or appointive positions they held, and the substance of their input.” However, by slowly reducing the number of required public meetings and webinars over time as described on page 30 of the Report, the Commission has rendered this public input requirement effectively inoperable. WATT Coalition members are ready and willing to participate in public meetings and webinars to lend utilities their expertise and help analyze GETs, but they have been unable to find any opportunities to do so in the context of the Report.

While there are references to stakeholder engagement for project siting and permitting sprinkled throughout the Report, there is no consistent record of the measures that utilities took to gather public input in identifying transmission inadequacies and analyzing alternative means of addressing them, nor of the quantity or substance of such input. The WATT Coalition believes that a suitable fulfillment of this obligation would be to host one public webinar for each of the three GETs technologies (Dynamic Line Ratings, Advanced

Power Flow Control, and Topology Optimization) in which members of the public can help identify transmission inadequacies and analyze alternative means of addressing them.

IV. Conclusion

Given the omission of GETs as alternatives for listed transmission inadequacies and the failure to include information on public input per *MN Rule 7848.1330* and *Minnesota Session Laws, 2024, Chapter 127, Article 42, Section 21*, the WATT Coalition concludes that the 2025 Minnesota Biennial Transmission Projects Report is not complete.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Julia Selker".

Julia Selker

Executive Director

WATT Coalition

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