

January 21, 2025

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 Application for a Certificate of Need and Route Permit for the Appleton to Benson 115 Kilovolt Transmission Line Project.
MPUC Docket Nos. ET2,E017,ET6135,E100/CN-24-263 and TL-24-264**

Dear Mr. Seuffert:

Great River Energy, Otter Tail Power Company (“Otter Tail Power”), Western Minnesota Municipal Power Agency (“Western Minnesota”), Agralite Electric Cooperative, and the City of Benson (together, “Applicants”) respectfully submit these reply comments concerning the completeness of the Joint Application for a Certificate of Need and Route Permit (“Application”) for the Appleton to Benson Transmission Line Project (“Project”). By the close of the initial comment period on January 14, 2025, comments were submitted by the Department of Commerce, Division of Energy Resources (“DOC-DER”)¹ and the Department of Commerce, Energy Environmental Review and Analysis (“DOC-EERA”)².

DOC-DER

DOC-DER recommends that the Minnesota Public Utilities Commission (“Commission”) find the Application complete upon submission of certain additional data related to the following rules: Minn. R. 7849.0260(C)(5); Minn. R. 7849.0270, subp. 2(C); and Minn. R. 7849.0270, subp. 6. The Applicants appreciate DOC-DER’s review of the Application and respond to the issues raised by DOC-DER below.

Minnesota Rule 7849.0260(C)(5) states that an application should include “an estimate of [a project’s] effect on rates systemwide in Minnesota, assuming a test year beginning with the proposed in-service date.” DOC-DER states that Otter Tail Power has provided the required information but that Great River Energy and Western Minnesota have not done so, noting that the Commission approved an exemption with respect to rate information for Minn. R. 7849.260, subps. A(3) and C(6).³ Section 3.4.2 *Effects on Rates* of the Application states:

¹ See DOC-DER Comments (Jan. 14, 2025) (eDocket No. [20251-213897-01](#)).

² See DOC-EERA Comments (Jan. 14, 2025) (eDocket No. [20251-213944-01](#)).

³ DOC-DER Comments, at pp. 3-4 (Jan. 14, 2025) (eDocket No. [20251-213897-01](#)).

- “Great River Energy’s share of the Project will have an approximate rate impact of \$1.5 million dollars on the annual transmission revenue requirement allocated to its 27 member-owners in the first year of operation. Each Great River Energy member-owner distribution cooperative develops their own rates based on individual costs, including allocated costs from Great River Energy, for their member-consumers via applicable customer rate class.”⁴
- “As a baseline reliability project, [Missouri River Energy Services (“MRES”)]’s portion of the Project will have an approximate rate impact of \$1.0 million in MISO revenue requirements in the first year of operation to the Otter Tail Power pricing zone in 2024 dollars. The Northern Cities Group comprises 12 members located in the Otter Tail and Minnesota Power Pricing Zones and share a common transmission rate from MRES. Since the revenue requirement for this Project will be recovered through the Otter Power Pricing Zone, this group of 12 members will help pay for this Project along with all other transmission customers in the zone. Each of the MRES members has their own retail rates for their retail customers which are set by their individual local utility boards/commissions/councils.”⁵

The Applicants respectfully submit that the information provided with respect to Great River Energy and Western Minnesota is responsive to the rule requirement because the Applicants have provided the rate impact of the Project for each entity, reflecting that each entity is a wholesale electric provider. As additional context, the Great River Energy rate impact represents a 0.7 percent increase to annual member transmission revenue requirements; the MRES rate impact represents a 1.4 percent increase to annual member transmission revenue requirements. The Applicants commit to coordinating further with DOC-DER should further questions arise regarding the Project’s effect on rates.

Minnesota Rule 7849.0270, subpart 2(C), states that an application should include “an estimate of the demand for power in the applicant’s system at the time of annual system peak demand. . . .” The Applicants requested an exemption from this requirement, instead proposing to provide “actual historical load data for local substations.”⁶ The Commission approved the Applicants’ requested exemption.⁷ DOC-DER states that it “is unable to find any actual historical

⁴ See Joint Application for a Certificate of Need and a Route Permit, at 32 (Dec. 27, 2024) (eDocket No. [202412-213349-02](#)) (hereafter “Joint Application”).

⁵ *Id.*

⁶ Applicants’ Request for Exemptions, at 8 (July 29, 2024) (eDocket No. [20247-209055-01](#)).

⁷ Order, at ¶ 6 (Oct. 1, 2024) (eDocket No. [202410-210618-01](#)).

monthly load data for local substations.”⁸ Table 4.2-1 of the Application includes actual historical peak load data (the highest peak hour seen by meter up to 2023) for each substation. All peak hours were found in the summer months, and the Applicants used a summer-peak model for the analysis. With this clarification, the Applicants respectfully submit that the data included in the Application includes the “actual historical load data for local substations” that the Applicants proposed to provide. The Applicants will also coordinate further with DOC-DER throughout this process to provide information needed for DOC-DER’s analysis.

Minnesota Rule 7849.0270, subpart 6, states that an application should include “a description of the extent to which the applicant coordinates its load forecasts with those of other systems” and “a description of the manner in which such forecasts are coordinated, and any problems experienced in efforts to coordinate load forecasts.” DOC-DER recommended that the Applicants provide a discussion responsive to this rule, and the Applicants do so in this filing. Specifically, as relevant to this Project, the Midcontinent Independent System Operator, Inc. (“MISO”) coordinates load forecasts in the local region through the MISO transmission expansion plan (“MTEP”) process. Load forecasts are provided by transmission owners to MISO annually to create a coordinated set of models used for transmission planning. For this Project, the load data and forecasts were coordinated with the Applicants as part of the analysis reflected in Appendix I and Section 4 of the Application, with Great River Energy, Otter Tail Power, and MRES (on behalf of Western Minnesota) providing the most up to date meter data and forecasts for the local study area. The Applicants did not experience any problems coordinating load forecasts for this Project.

DOC-EERA

DOC-EERA recommends that the Commission accept the Application as substantially complete with respect to route permit application completeness requirements. DOC-EERA also recommends that the Commission conduct the environmental review and hearing processes for the certificate of need and route permit jointly, including preparation of an environmental assessment in lieu of an environmental report. Finally, DOC-EERA recommends that the Commission not appoint an advisory task force at this time, and that the Commission request a full administrative law judge report with recommendations for the Project’s public hearing.⁹

The Applicants appreciate DOC-EERA’s review of the Application and agree with DOC-EERA’s recommendations.

⁸ DOC-DER Comments, at 5 (Jan. 14, 2025) (eDocket No. [20251-213897-01](#)).

⁹ DOC-EERA Comments, at 7 (Jan. 14, 2025) (eDocket No. [20251-213944-01](#)).

Conclusion

The Applicants respectfully request that the Commission:

- Find the Application to be substantially complete with the additional information included with this filing;
- Determine there are no contested issues of fact with respect to the representations made in the Application;
- Decline to appoint an advisory task force;
- Order that the certificate of need and route permit be processed jointly, including the environmental review and hearing processes; and
- Delegate administrative authority to the Executive Secretary to issue the Delegation of Authority to the Applicants for Minnesota State Historic Preservation Office consultation.

These reply comments have been e-filed today through www.edockets.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,

/s/ Haley Waller Pitts

Haley L. Waller Pitts
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the Appleton to Benson 115 Kilovolt
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TL-24-264**

CERTIFICATE OF MAILING

Breann L. Jurek certifies that on the 21st day of January, 2025, she e-filed on behalf of Applicants, a true and correct copy of their Reply Comments regarding Application Completeness, with the Minnesota Public Utilities Commission via eDockets (www.edockets.state.mn.us). Said documents were also served on the Official Service Lists of record on file with the Minnesota Public Utilities Commission and as attached hereto.

Executed on: January 21, 2025

Signed: /s/ Breann L. Jurek

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60 South Sixth Street
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1	Lisa	Agrimonti	lagrimonti@fredlaw.com	Fredrikson & Byron, P.A.		60 South Sixth Street Suite 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	24-263CN-24-263
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9	David C.	McLaughlin	dmclaughlin@fluegellaw.com	Western Minnesota Municipal Power Agency		129 2nd Street Ortonville MN, 56278 United States	Electronic Service		No	24-263CN-24-263
10	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General - Residential Utilities Division		1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	24-263CN-24-263
11	Will	Seuffert	will.seuffert@state.mn.us	Public Utilities Commission		121 7th Pl E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	24-263CN-24-263
12	Mark	Strohfus	mstrohfus@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-263CN-24-263
13	Haley	Waller Pitts	hwallerpitts@fredlaw.com	Fredrikson & Byron, P.A.		60 S Sixth St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	24-263CN-24-263

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3	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General - Department of Commerce		445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	24-264TL-24-264
4	Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce		85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	24-264TL-24-264
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8	Stephen	Kowal	skowal@bensonmnlaw.com	Wilcox Law Office, P.A.		1150 Wisconsin Avenue Benson MN, 56215 United States	Electronic Service		No	24-264TL-24-264
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