

Staff Briefing Papers

Meeting Date	December 4, 2025		Agenda Item 3*
Company	All Electric Utilities		
Docket No.	U999/PR-25-16		
	In the Matter of Commission Subcommittee Delegations under Minn. Stat. 216A.03, subdivision 8		
Issues	What action should the Commission take on the Commission Subcommittee Delegations for Regional Transmission Organizations (RTOs)?		
	What action should the Commission take on a proxy for NERC voting ballots?		
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✓ Relevant Documents	Date
RTO Approval Subcommittees Policy and Operating Procedure (Attachment A to Staff Briefing Papers)	Sept. 30, 2022

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The attached materials are work papers of the Commission Staff. They are intended for use by the Public Utilities Commission and are based upon information already in the record unless noted otherwise.

BACKGROUND

Under Minn. Stat. § 216A.03, subd. 8, the Commission may create and appoint members to subcommittees of the Commission consisting of at least one Commissioner and delegate authority to a subcommittee to act on behalf of the Commission.

DISCUSSION

The Commission participates in both the Organization of Midcontinent Independent Service Operator (MISO) States (OMS) and the Southwest Power Pools Regional State Committee (SPP RSC) to provide input on Regional Transmission Operator (RTO) policy and issues. This participation is through the Commission's Regional Energy Program and lead Commissioners – currently, Commissioner Sullivan for MISO and Commissioner Tuma for SPP.

The RTO subcommittees are delegated authority to approve action on behalf of the full Commission on RTO-related activities, such as joining OMS or SPP comments. Consistent with Minn. Stat. § 216A.03, subd. 8(b), the Commission's RTO Subcommittee process allows Commissioners an opportunity to object to a subcommittee's decision, calling for an open meeting to discuss the matter. If no objection is made, the subcommittee's decision is deemed a decision of the full Commission. Given the increasing and significant regional issues and decisions to be made by the affected states, re-affirming and clarifying the subcommittee decision process is appropriate at this time.

Separately, the Commission may participate in North American Electric Reliability Corporation (NERC) voting ballots as a state representative. The Commission's staff track NERC standard development both in the Regional Energy Program and through National Association of Regulatory Utility Commissioners (NARUC) representation in NERC's Reliability and Security Technical Committee (RSTC). For example, NERC has initiated a ballot process for development of a reliability standard related to the Commission's resource planning and engagement in RTOs known as the Energy Assurance Policy Standard.

DECISION OPTIONS

1. Re-affirm the Commission's delegation for RTO subcommittees under Minn. Stat. § 216A.03, subd. 8, and delegate authority to the subcommittees to approve actions on behalf of the full Commission on RTO-related activities consistent with the Commission's RTO Approval Subcommittees Policy and Operating Procedure.
2. Reappoint Commissioner Joseph Sullivan to the MISO subcommittee.
3. Reappoint Commissioner John Tuma to the SPP subcommittee.
4. Delegate authority to the Executive Secretary to be the Minnesota PUC proxy for NERC voting ballots consistent with the RTO Subcommittees.

RTO Approval Subcommittees

Policy and Operating Procedure

Purpose

The purpose of this Policy and Operating Procedure is to establish the procedures that will govern approvals for filings related to the Midcontinent Independent System Operator (“MISO”) and the Southwest Power Pool (“SPP”).

Creation of RTO Subcommittees

The Commission has established subcommittees related to MISO and SPP, and formally delegated authority to them.

Approval Process

Assigned regulatory staff will work with delegated Commissioners to identify possible filings, respond to requests to sign-on to joint comments, and draft documents as requested.

Commissioners who are delegated approval authority will make decisions about whether to approve action on behalf of the full Commission.

Process After Approvals.

After a subcommittee chair approves an RTO filing, but before the filing is made, assigned staff should send an email to all Commissioners. Except for emergency situations, Commissioners should be provided with at least three days to review. The email about the filing should include the following information:

- Provide background about the proceeding and issues that are addressed in the filing;
- Provide a copy of the draft filing;
- State the date on which the document will be filed;
- Establish a deadline by which Commissioners must request an open meeting, and possible scheduling for that meeting; and,
- Offer to schedule a private briefing for any Commissioners that want one.

Staff should consult with General Counsel about open meeting requirements and possible scheduling before sending the email.

If a Commissioner requests an open meeting to discuss the draft comments, it will be scheduled consistent with the open meeting law.



Will Seuffert, Executive Secretary

9/30/22

Effective: _____