

November 15, 2023

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce**
Docket No. E999/M-23-91

Dear Mr. Seuffert:

The Minnesota Department of Commerce (Department) reviewed the *2023 Biennial Transmission Projects Report* (Report) for compliance with Minnesota Rules 7848.1300 and the Minnesota Public Utilities Commission's (Commission) June 29, 2022 Order on the 2021 Biennial Transmission Projects Report.¹ The Department has reviewed the Report and concludes that the required information is located either in the Report or in the referenced Midcontinent Independent System Operator (MISO) Transmission Expansion Plan.

Minnesota Rules 7848.1300 B requires "a copy of the most recent regional load and capability report of the Mid-Continent Area Power Pool [MAPP] or other appropriate regional reliability council." As MAPP no longer exists², the Report included the North American Electric Reliability Corporation's (NERC) 2022 Long-Term Reliability Assessment as Appendix A of the Report.

Additionally, Minnesota Statutes § 216B.2425, subds. 2(e) and 8 contain two additional requirements for utilities operating under multiyear rate plans. Northern States Power Company d/b/a Xcel Energy is the only utility operating under a multiyear rate plan and the requirements were addressed in section 2.6 of the Petition.

¹ See the Commission's June 29, 2022 *Order Accepting Report* in Docket No. E999/M-21-111 available at: <https://www.edockets.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId={40AFB081-0000-C916-B94F-86F572A03166}&documentTitle=20226-186966-01>.

² MAPP's successor is the Midwest Reliability Organization.

Based upon the above analysis the Department recommends that the Commission declare the Report complete.

Minnesota Rules 7848.1800, Subpart 6 requires a “recommendation on what procedural framework the Commission should use to examine and act on the filing.” The Department recommends that the Commission use the standard comment, reply comment procedural framework. The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ LOUISE MILTICH
Assistant Commissioner of Regulatory Analysis

/s/ STEVE RAKOW
Analyst Coordinator

SR/ad

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Comments

Docket No. E999/M-23-91

Dated this **15th** day of **November 2023**

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_23-91_M-23-91
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_23-91_M-23-91
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_23-91_M-23-91
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_23-91_M-23-91