



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

**In the Matter of the 2025 Minnesota Biennial Transmission Projects Report
RE: Grid Enhancing Technologies Report**

PUC Docket Number: E999/M-25-99

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 Grid Enhancing Technologies Report contained within the 2025 Minnesota Biennial Transmission Projects Report. These comments address the following question identified in the Commission’s Notice of Comment issued on November 12, 2025: *Is the 2025 Grid Enhancing Technologies Report (GETs Report) complete?*

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 2025 Grid Enhancing Technologies Report (GETs Report) Complete?

The Commission’s September 10, 2025 Order in Docket No. E999/M-25-99 states:

“Transmission owners will be required to include in their November 2025 reports the following information:

- a. *for each location identified in the 2025 grid enhancing technology report as experiencing a high level of congestion during the past three years, an explanation of whether congestion is expected to be recurring, and why or why not;*

- b. *a schedule and cost estimate to install such grid enhancing technologies at each congestion point identified at which the payback period is less than or equal to five years;*
- c. a schedule and cost estimate to install grid enhancing technologies at each congestion point identified at which the payback period is less than or equal to a value appropriate to the specific technology and potential application;
- d. an explanation of and rationale for each threshold value used to determine which projects are included in its proposed grid enhancing technology implementation plan;
- e. a description of efforts to evaluate and compare:
 - i. combinations of grid enhancing technologies;
 - ii. combinations of grid enhancing technologies with traditional upgrades;
 - iii. traditional upgrades such as transformer or substation upgrades; and
 - iv. learnings from this effort that may inform future grid enhancing technologies evaluations;
- f. an explanation of whether equity, environmental justice, and workforce impacts were incorporated into the evaluation, and if so, a description of how and where in the process these factors were evaluated. And, in advance of filing the report, transmission owners shall consult with the Department and other stakeholders on how the evaluation can incorporate equity, environmental justice, and workforce impacts;
- g. a description of efforts to work with MISO, other RTOs and other transmission owners to reduce congestion and optimize transmission investment through regional processes. This discussion shall address at least the following topics:
 - i. efforts to advance cost-effective grid enhancing technology's deployment;
 - ii. coordination to minimize costs of transmission outages;
 - iii. regional transmission planning; and
 - iv. financial strategies to reduce the cost to ratepayers of congestion or curtailment;
- h. verification that transmission owners consulted with grid enhancing technology vendors and other stakeholders during the modeling process to ensure that modeling best practices were considered and applied as appropriate and that modeling results reflect probably and realistic outcomes.”

Given that pages 19-183 of the GETs Report discussing individual transmission constraints are marked “NONPUBLIC” and have therefore been omitted pursuant to Minn. R. 7829.0500, subp. 3, the WATT Coalition is unable to determine whether all of the information required in the September 10 Order is present. Additionally, the WATT

Coalition seeks clarification on whether the 66 high congestion constraints identified in the GETs Report are part of the 158 transmission inadequacies identified in the 2025 Minnesota Biennial Transmission Projects Report. For these reasons, the WATT Coalition concludes that the Grid Enhancing Technologies 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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