

February 21, 2020

VIA ELECTRONIC FILING

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

**RE: REPLY COMMENTS
2019 BIENNIAL TRANSMISSION PROJECTS REPORT
DOCKET NO. E999/M-19-205**

Dear Mr. Seuffert:

The Minnesota Transmission Owners (MTO) submit this reply according to the Minnesota Public Utilities Commission's November 15, 2019 Notice of Comment Period and Establishment of Service list in the above-referenced docket.

REPLY

On November 15, 2020, the Southwest Regional Development Commission staff filed notes summarizing the Biennial Report projects in its region. This filing did not contain substantive comments directed to the MTO or Commission but noted that "In general, two of the largest obstacles to building more wind and solar projects are transmission constraints and storage to handle the intermittency of renewables. Improved transmission capacity and reliability would likely incentivize more renewable energy projects throughout the state."

On January 2, 2020 the Department of Commerce, Division of Energy Resources submitted comments on the 2019 Biennial Transmission Projects Report. No other comments were submitted. We appreciate the Department's review and provide this brief reply.

The Department requested that the Commission require Otter Tail Power Company, Minnesota Power, and Xcel Energy to provide the following information in future rate requests to recover the costs of new energy facilities:

- a summary of all mitigation measures that have been added at any step in the permitting process,

- the general reason for the mitigation measure, including whether the measure was requested or required,
- the entity requesting or requiring the mitigation, and
- the cost of the mitigation measure.

Xcel Energy, Otter Tail Power Company, and Minnesota Power continue to respond, as they have for several rounds of biennial reports, that they have no objection to providing such information in future rate recovery requests for new energy facilities. Consistent with its past responses, however, the utilities also continue to maintain that it would be inappropriate for the Commission to order submission of such information in the Biennial Report docket. On June 7, 2016, the Commission issued a second order, an Erratum Notice, clarifying that it was not ordering, in the biennial report docket, the rate-regulated utilities to provide that information.

CONCLUSION

The Minnesota Transmission Owners respectfully request that the Commission take action and issue an order regarding the 2019 Biennial Report that includes the following.

1. Find that the 2019 Biennial Report meets the requirements of Minn. Stat. § 216B.2425 and accept the report.
2. Find that since no party has requested certification for any of the projects listed in the reports, it is unnecessary to certify, certify as modified, or deny certification of any projects.
3. Extend the variance from Minnesota Rules part 7848.0900 that it has granted for the past several reports to relieve the utilities of the obligation to hold public meetings in each transmission planning zone. And further, determine that the MTO shall not be required to hold a webinar on the 2021 Biennial Report.
4. Direct the Transmission Owners to include content similar to the 2019 Report in the 2021 Report.
5. Find that for future reports, MTO may provide a link to the report on the MTO website, www.minneletrans.com, as well as directions to access the report via eDockets, in lieu of mailing CDs or jump drives with electronic copies of the report to the required notice lists.

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We have electronically filed this document with the Commission and copies have been served on all parties on the attached service list. Please let me know if you have any questions regarding this filing.

Sincerely,

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