

April 2, 2026

VIA E-FILING

Ms. Sasha Bergman
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, MN 55101-2147

**Re: In the Matter of the 2025 Minnesota Biennial Transmission Projects Report.
MPUC Docket No. E999/M-25-99**

Dear Ms. Bergman:

The Minnesota Transmission Owners (“MTO”) respectfully submit these Supplemental Comments on GETs Report.

These supplemental comments have been e-filed through www.edocket.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,

FREDRIKSON & BYRON, P.A.



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**STATE OF MINNESOTA
BEFORE THE
PUBLIC UTILITIES COMMISSION**

Katie Sieben
Joseph Sullivan
John Tuma
Hwikwon Ham
Audrey Partridge

Chair
Vice-Chair
Commissioner
Commissioner
Commissioner

**In the Matter of the 2025 Minnesota
Biennial Transmission Projects Report**

Docket No. E999/M-25-99

**MINNESOTA TRANSMISSION OWNERS
SUPPLEMENTAL COMMENTS ON
GETS REPORT**

The Minnesota Transmission Owners (MTO) provide these Supplemental Comments in response to comments submitted on February 27, 2026 by the Rural MN Energy Board, and on March 2, 2026 by the WATT Coalition, the AMP Coalition, and Clean Grid Alliance regarding the Grid Enhancing Technologies (GETs) Report. The MTO previously filed reply comments on March 2, 2026 to address initial comments submitted by the Minnesota Department of Commerce (Department) and the WATT Coalition. The MTO appreciate the comments provided in this Docket look forward to continued collaboration in future iterations of the GETs Report. In these Supplemental Comments, the MTO discuss two additional issues raised in the Reply Comments not previously addressed.

The AMP Coalition proposes that the GETs Report “be required as a recurring study conducted every two years alongside the Biennial Transmission Projects Report.”¹ The MTO do not object to this recommendation and had already planned to include the next iteration of the

¹ AMP Coalition Reply Comments at 4-5. See also, WATT Coalition Reply Comments (March 2, 2026) at 5.

GETs Report in the 2027 Biennial Transmission Projects Report. The MTO appreciate the feedback by various parties and will work to improve the transparency and accessibility in the next iteration of the GETs Report.

The AMP Coalition also proposes that the Minnesota Public Utilities Commission (Commission) expand the scope of the GETs Report to include High Performance Conductors.² As a matter of principle, the MTO object to adding requirements to evaluate specific technologies. The MTO have a responsibility and duty to plan and operate the transmission system in a manner that maintains reliability and minimizes costs for customers, regardless of the technology employed. Requiring evaluation of specific technologies risks skewing analysis and creating planning expectations that are not grounded in identified system needs.

Additionally, the MTO are concerned about the precedent such a requirement could establish for future GETs Reports. Transmission technologies are rapidly evolving, with new products at varying stages of commercial readiness. Commission compliance requirements should not prescribe consideration of specific technologies in the absence of a clearly identified issue, as doing so risks promoting ‘a solution in search of an issue.’ Instead, once a specific issue is identified, transmission owners should retain the flexibility to evaluate all available technologies to determine the most effective solution.

Minnesota’s statutory definition of GETs is broad enough to cover all technologies. The Minnesota Legislature has defined GETs as:

hardware or software that reduces congestion or enhances the flexibility of the transmission system by increasing the capacity of a high-voltage transmission line or rerouting electricity from overloaded to uncongested lines, while maintaining industry safety standards. Grid enhancing technologies include but are not limited to dynamic line rating, advanced power flow controllers, and topology optimization.³

² AMP Coalition Reply Comments at 2-4.

³ Minn. Stat. § 216B.2425, subd. 1a(e).

Given this definition, and without prejudging specific technologies, it is not necessary to adopt the AMP Coalition's recommendation to require the MTO to include advanced conductors in the next GETs Report.

The MTO want to make clear this objection is general in nature and not directed towards advanced conductors or any particular technology. MTO members are actively piloting advanced conductors, which are considered as part of overall transmission planning to identify the most affordable solutions for Minnesota customers.

The MTO appreciate the opportunity to provide supplemental comments and look forward to the upcoming Commission hearing on this matter.

Dated: April 2, 2026

Respectfully submitted,



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Attorneys for Minnesota Transmission Owners

CERTIFICATE OF SERVICE

Michael Latana certifies that on the 2nd day of April, 2026, he e-filed true and correct copy the following documents on behalf of Minnesota Transmission Owners via eDockets (www.edockets.state.mn.us):

1. Supplemental Comments on GETs Report.

Said document was also served as designated on the Official Service Lists on file with the Minnesota Public Utilities Commission and as attached hereto.

Executed on: April 2, 2026

Signed: /s/ Michael Latana

Fredrikson & Byron, P.A.

60 South Sixth Street

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#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 25-99
2	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	Official 25-99
3	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 25-99
4	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	Official 25-99
5	Ian M.	Dobson	ian.m.dobson@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	Official 25-99
6	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	Official 25-99
7	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	Official 25-99
8	David R.	Moeller	drmoeller@fredlaw.com	Fredrikson & Byron, P.A.		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	Official 25-99
9	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	Official 25-99
10	Julia	Selker	jselker@gridstrategiesllc.com	WATT Coalition		110 Allen St Suite A&B Cumming GA, 30040 United States	Electronic Service		No	Official 25-99
11	Adam	Sokolski	adam.sokolski@edf-re.com	EDF Renewable Energy		10 Second Street NE Ste 400 Minneapolis MN, 55410 United States	Electronic Service		No	Official 25-99
12	Dennis	Welgraven	dwelgraven@co.murray.mn.us	Murray County Board of Commissioners		2848 Broadway Ave PO Box 57 Slayton MN, 56172 United States	Electronic Service		No	Official 25-99