

November 19, 2025

Sasha Bergman
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: Completeness Comments of the Minnesota Department of Commerce
Docket No. E999/M-25-99

Dear Ms. Bergman:

The Minnesota Department of Commerce (Department) reviewed the Minnesota Transmission Owners (MTO) *2025 Biennial Transmission Projects Report*¹ for compliance with Minn. Stat. § 216B.2425,² Minnesota's new grid enhancing technology report (GETs Report) requirement,³ Minn. R. 7848.1300,⁴ the Minnesota Public Utilities Commission's (Commission) Orders on the 2023 Biennial Transmission Projects Report,⁵ the investigation into Nobles County Substation Curtailments,⁶ and the 2025 Biennial Transmission Projects Report.⁷ The Department's review of the Report did not find any issues of substance regarding completeness. Therefore, the Department recommends the Commission take no action regarding completeness. Also, Minn. R. 7848.1800, subp. 6⁸ 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.

¹ *In the Matter of the 2025 Biennial Transmission Projects Report*, Minnesota Transmission Owners, Petition, October 31, 2025, Docket No. E999/M-25-99, (eDockets) [202510-224474-02](#), [202510-224474-03](#), [202510-224474-05](#), [202510-224474-06](#), (hereinafter "Report").

² See [Minn. Stat. 216B.2425](#).

³ Laws of Minn. 2024, ch. 127, art. 42, sec. 52.

⁴ See [Minn. R. 7848.1300](#).

⁵ *In the Matter of the 2023 Minnesota Biennial Transmission Projects Report, Order Accepting Report*, June 7, 2024, Docket No. E999/M-23-91, (eDockets) [20246-207503-01](#).

⁶ *In the Matter of the Investigation into Transmission-Curtailment Matters, Drivers, and Potential Solutions to Limitations Resulting from the Nobles County Substation, Order Establishing Filing Requirements*, March 24, 2025, Docket No. E999/CI-24-316, (eDockets) [20253-216722-01](#).

⁷ *In the Matter of the 2025 Biennial Transmission Projects Report, Order Establishing Filing Requirements*, September 10, 2025, Docket No. E999/M-25-99, (eDockets) [20259-222888-01](#).

⁸ See [Minn. R. 7848.1800](#).

Note that Minn. R. 7848.1300 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 exists⁹, the Report included the North American Electric Reliability Corporation’s (NERC) 2024 Long-Term Reliability Assessment as Appendix A.

Finally, the Department notes that MTO filed a request regarding comment periods on the GETs Report.¹⁰ MTO requests a variance of Minn. R. 7848.1800, per Minn. R. 7829.3200¹¹ to modify the comment periods to be February 2, 2026, March 2, 2026, and April 2, 2026.

Minn. R. 7829.3200 provides three criteria to vary rules:

- A. enforcement of the rule would impose an excessive burden upon the applicant or others affected by the rule;
- B. granting the variance would not adversely affect the public interest; and
- C. granting the variance would not conflict with standards imposed by law.

MTO justifies the variance request as follows:

- A. the proposed comment schedule provides additional time for all parties to analyze the GETs Report and not impose an excessive burden on any party;
- B. granting such a variance would not adversely affect the public interest as a full review of the GETs Report will be done to provide the information needed for the Commission to make its determination.
- C. the variance would not conflict with standards imposed by law as the comment deadlines are a Commission rule and the Commission typically modifies comment periods at the requests of applicants or other parties.

The Department agrees with MTO’s analysis and recommends that the Commission approve the rule variance for comment periods on the GETs Report. The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ Sydnie Lieb, Ph.D.
Assistant Commissioner, Office of Regulatory Analysis

SR/ar

⁹ MAPP’s successor is the Midwest Reliability Organization.

¹⁰ *In the Matter of the 2025 Biennial Transmission Projects Report*, Minnesota Transmission Owners, Letter, November 10, 2025, Docket No. E999/M-25-99, (eDockets) [202511-224818-01](#).

¹¹ See [Minn. R. 7829.3200](#).

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
Completeness Comments**

Docket No. E999/M-25-99

Dated this **19th** day of **November 2025**

/s/Sharon Ferguson

#	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		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