

January 16, 2026

Sasha Bergman
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-25-99

Dear Ms. Bergman,

Attached are the comments of the Minnesota Department of Commerce (Department) in the following matter:

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

The Petition was filed by Minnesota Transmission Owners on October 31, 2025.

The Department recommends **accepting the report** and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Dr. SYDNIE LIEB
Assistant Commissioner of Regulatory Analysis

SR/ad
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. E999/M-25-99

I. INTRODUCTION

On October 31, 2025, the Minnesota Transmission Owners (MTO) submitted to the Minnesota Public Utilities Commission (Commission) MTO’s 2025 Biennial Transmission Projects Report (Report).¹ MTO is a coalition of fourteen electric utilities that own or operate high voltage transmission facilities in Minnesota.² The Report provides an overview of MTO’s transmission planning activities. The focus is on MTO’s analysis of situations where the present transmission infrastructure is unable or likely to be unable in the foreseeable future to perform in a consistently reliable fashion and in compliance with regulatory standards. The Report does not seek certification of any high voltage transmission lines.

Included within the Report is the *Minnesota 2025 Grid Enhancing Technologies (GETS) Study Report* (GETS Report).³ No Recommendations for Findings from these Comments should be construed as addressing the GETS Report. The Department will address the GETS Report in separate comments.

II. PROCEDURAL BACKGROUND

- October 31, 2025 MTO filed the Report providing an overview of MTO’s transmission planning activities.
- November 10, 2025 The Commission posted a notice of comment period for the Report.⁴
- November 26, 2025 The Commission issued an order approving a rule variance for comment periods on the GETs Report.⁵

¹ *In the Matter of the 2025 Minnesota Biennial Transmission Projects Report*, MTO, Petition, February 18, 2021, Docket No. E999/M-25-99, (eDockets) [202510-224474-01](#), [202510-224474-02](#), [202510-224474-03](#), [202510-224474-05](#), [202510-224474-06](#), (hereinafter “Report”).

² The members of the MTO are: American Transmission Company, LLC (ATC); Central Minnesota Municipal Power Agency (CMMPA); Dairyland Power Cooperative (DPC); East River Electric Power Cooperative (EREPC); Great River Energy (GRE); ITC Midwest LLC (ITC); L&O Power Cooperative (LOPC); Minnesota Power (MP); Minnkota Power Cooperative (MPC); Missouri River Energy Services (MRES); Northern States Power Company (Xcel); Otter Tail Power Company (OTP); Rochester Public Utilities (RPU); and Southern Minnesota Municipal Power Agency (SMMPA). Note that Hutchinson Utilities Commission, Marshall Municipal Utilities and Willmar Municipal Utilities are all served by MRES, and thus MRES does the reporting for them.

³ Report at Appendix B.

⁴ *In the Matter of the 2025 Minnesota Biennial Transmission Projects Report, Notice of Comment Period*, November 10, 2025, Docket No. E999/M-25-99, (eDockets) [202511-224781-01](#), (hereinafter “Notice”).

⁵ *In the Matter of the 2025 Minnesota Biennial Transmission Projects Report, Order*, November 26, 2025, Docket No. E999/M-25-99, (eDockets) [202511-225327-01](#).

According to the Notice the following topics are open for comment regarding the Report:

- Is the Biennial Transmission Projects Report (Report) complete (that is, does it contain the required information as set out in MN Rule 7848.1300)?⁶
- Are there questions or concerns regarding the representations made in the Report?
- Should the Commission continue to grant the waiver to the public meeting and related notice requirements for the next Report cycle?
- Does the report comply with, and is the information sufficient to meet the requirements in the Commission’s Orders issued on March 24, 2025, in Docket No. E-999/CI-24-316 and June 7, 2024, in Docket No. E-999/M-23-91?
- Are there other issues or concerns related to this matter?

Note that the Department’s comments below discuss several prior Commission orders. Several of the orders state that they apply to the next filing and thus do not appear to be an on-going requirement. However, MTO typically treated these requirements as on-going rather than one-time. For simplicity, the Department did not flag requirements that appear to be one-time rather than on-going.

III. DEPARTMENT ANALYSIS

A. LIST OF PROPOSED PROJECTS

Minn. Stat. § 216B.2425, subd. 2 requires utilities that own or operate electric transmission lines in Minnesota, which includes generation and transmission organization that serve distribution utilities to file a transmission report by November 1 of each odd-numbered year.⁷ The report must:

- 1) list specific present and reasonably foreseeable future inadequacies in the transmission system in Minnesota;
- 2) identify alternative means of addressing each inadequacy listed;
- 3) identify general economic, environmental, and social issues associated with each alternative; and
- 4) provide a summary of public input related to the list of inadequacies and the role of local government officials and other interested persons in assisting to develop the list and analyze alternatives.

Minn. Stat. § 216B.2425, subd. 3 requires, by June 1 of each even-numbered year, the Commission to adopt a state transmission project list and to certify, certify as modified, or deny certification of the transmission projects proposed under subdivision 2.⁸ In the Report no new transmission projects were proposed for certification.

⁶ Note: Per rule, challenges to completeness must be received within 20 days of the date of the initial filing.

⁷ See [Minn. Stat. § 216B.2425, subd. 2.](#)

⁸ See [Minn. Stat. § 216B.2425, subd. 3.](#)

B. VARIANCE REQUESTS

MTO made several rule variance requests in the Report. First, MTO requested the Commission extend the rule variances granted in the June 7, 2024 Order accepting the 2023 Biennial Report (and previous orders) for the 2027 Biennial Report as well, such that the future report requirements will mirror the content, notice and participation requirements of the 2025 Biennial Report.⁹ As explained below, MTO requested the variance due to lack of public participation and use of other means to engage the public. Second, MTO requests it be allowed to continue to reference the latest MISO Transmission Expansion Plan (MTEP Report) to provide information about the identified inadequacies in Minnesota. Third, MTO requests that the public meeting or webinar requirements in Minn. R. 7848.0900 and related to outreach in Minn. R. 7848.1000 be waived.

Minn. R. 7829.3200 allows the Commission to vary its rules if it finds:

- 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 states it can satisfy all three elements, respectively, as follows:

- “As has been demonstrated in previous biennial report proceedings, application of these rules would excessively burden the MTO by requiring them to spend money and divert engineers and other experts to producing duplicative information and attend meetings that do not appear to have a corresponding public benefit;”
- “lack of public participation in the public meetings and webinars demonstrates that waiving the rules does not adversely affect the public interest,” and
- “the variances is not contrary to any standard imposed by law.”¹⁰

The Department agrees with MTO that the requested variances are consistent with Commission decisions in proceedings regarding prior biennial reports and that MTO has met the criteria for the Commission to grant a variance. Therefore, the Department recommends the Commission grant the requested variances.

C. TRANSMISSION ISSUES

Minn. R. 7848.1300, subps. D and E require the Report to contain:

- list of inadequacies in the transmission system currently affecting reliability;
- a list of reasonably foreseeable future inadequacies expected to affect reliability over the next ten years; and

⁹ *In the Matter of the 2023 Minnesota Biennial Transmission Projects Report*, Commission, Order Accepting Report, June 7, 2024, Docket No. E999/M-23-91, (eDockets) [20246-207503-01](#), at order point 5, (hereinafter “23-91 Order”).

¹⁰ Report at 9.

- a list of all alternative means of addressing each inadequacy identified.¹¹

Chapter 6 of the Report provides a lengthy discussion of the current and future inadequacies that would impact reliability. The lists of transmission needs for each of the transmission planning zones can be summarized as follows:

- Northwest Zone:
 - Nine projects listed, one of which triggers a certificate of need (CN) requirement:
 - Cormorant Junction – Tamarac – Pelican Rapids (LR-PC) Line Rebuild project: planned to be in service by winter 2030. See tracking number 2023-NW-N2.
 - Six projects listed as completed, cancelled, or moved to study.
- Northeast Zone:
 - 46 projects listed, eight of which trigger CN requirements:
 - Duluth Area 230 kV project: in-service date delayed to the late 2020s or even into the 2030s; see tracking number 2007-NE-N1.
 - HVDC Modernization project: targeted in-service date between April 2029 and April 2030 (see Docket No. E015/CN-22-607); tracking number 2013-NE-N16.
 - Duluth Loop Reliability project: in-service date of 2025 (see Docket No. E015/CN-21-140); see tracking number 2019-NE-N12.
 - Northland Reliability project: in-service by June 2030 (see Docket No. E015,ET2/CN-22-416); see tracking number 2023-NE-N1.
 - 158 Line Rebuild project: phased construction beginning in 2028 at the earliest; see tracking number 2023-NE-N6.¹²
 - Maple River – Cuyuna 345 kV (LRTP Project #20) project: in-service by June 1, 2033; see tracking number 2025-NE-N1.
 - Iron Range – St Louis County – Arrowhead 345 kV (LRTP Project #21) project: in-service by June 1, 2032; see tracking number 2025-NE-N2.
 - Babbitt 115 kV Transmission project: construction anticipated to start in 2027; see tracking number 2025-NE-N12.
 - 17 projects listed as completed or withdrawn (replaced by other projects).
 - West Central Zone:
 - 28 projects listed, five of which trigger CN requirements:
 - Appleton – Benson 115 kV Line project: planned to be in service by March 2030, (CN is on-going in Docket No. ET2,E017,ET6135, E100/CN-24-263); see tracking number 2021-WC-N6.
 - Big Stone South – Alexandria – Big Oaks 345 kV project: in-service dates of fourth quarter 2027 (eastern segment) and fourth quarter 2030 to

¹¹ See [Minn. R. 7848.1300](#).

¹² Note the Report states “In reviewing the existing 13 Line (see Project 2021-NE-N23) and 158 Line transmission line corridor, Minnesota Power determined it would be prudent and necessary to file a combined Certificate of Need and Route Permit Application for the projects.” Report at 87.

- fourth quarter 2031 (western segment) (see Docket No. E002, E017, ET2, E015, ET10/CN-22-538); see tracking number 2023-WC-N3.
- Willmar – Litchfield – Forest City – Hutchinson Rebuild and 115 kV Conversion project: scheduled for fourth quarter 2031 completion; see tracking number 2023-WC-N5.
 - Alexandria Substation Expansion project: partially in-service second quarter 2027, fully in-service second quarter 2030; see tracking number 2023-WC-N14.¹³
 - Minnesota Energy Connection project: in service by October of 2028, (Docket No. E002/CN-22-132); see tracking number 2025-WC-N8.
 - 14 projects listed as completed or cancelled.
 - Twin Cities Zone:
 - 27 projects listed, one triggers a CN requirement:
 - King Transmission Connection project: in-service by June of 2027. See tracking number 2025-TC-N12.¹⁴
 - 26 projects listed as completed or cancelled.
 - Southwest Zone:
 - 25 projects listed, four of which trigger CN requirements:
 - Fairmont, MN Area Transmission Expansion project: expected in-service date is late 2026; see tracking number 2023-SW-N10.¹⁵
 - JTIQ Lyon Co - Lakefield Junction project: expected in-service date is June of 2033; see tracking number 2025-SW-N2.
 - Split Rock - Chanarambie Line 345 kV line JTIQ project: expected in-service date is late 2026; see tracking number 2025-SW-N3.
 - PowerOn Midwest (LRTP Projects 22, 23, 23 and 25) project: The 765kV and 345kV portions are planned to be in-service in 2034 and 2032 respectively (Docket No. E-002,ET-2,ET-6675/CN-25-117); see tracking number 2025-SW-N9.
 - Four projects listed as completed.
 - Southeast Zone:
 - 23 projects listed, three of which trigger CN requirements:
 - Marion Road to Mississippi River 765 kV Transmission Line project: in-service date from 2032 to 2034; see tracking number 2025-SE-N1.
 - Cleveland – Sheas Lake Rebuild project: in-service date 2029; see tracking number 2025-SE-N1.
 - Gopher to Badger Link (LRTP #26) project: in-service date 2034; see tracking number 2025-SE-N14.
 - five projects listed as completed.

¹³ While listed separately, this project is part of the Big Stone South – Alexandria – Big Oaks 345 kV project above.

¹⁴ *In the Matter of the 2023 Minnesota Biennial Transmission Projects Report*, MTO, Information Request Response, December 12, 2025, Docket No. E999/M-25-9599, (eDockets) [202512-225800-01](#), at No. 2 (hereinafter “IR Responses”).

¹⁵ IR Responses at 1.

Overall, 158 projects are listed, 22 of which are listed as triggering CN requirements. In addition, 72 projects are reported as completed, cancelled, withdrawn, or moved to study. The Department has no further comment on the list of transmission issues.

D. TRANSMISSION STUDIES

Minn. R. 7848.1300, subp. F requires the Report to contain a list of studies that have been completed, are in progress, or are planned that are relevant to each of the inadequacies listed in the Report. Chapter 3 of the Report discusses transmission studies as follows:

- Section 3.2 lists three transmission studies that were completed since the last Biennial Report was filed in 2023.¹⁶
- Section 3.3 discusses MISO’s annual MTEP process, including the MTEP reports for 2021 through 2025.
- Section 3.4 lists three load-serving studies.

Regarding the load serving studies the Report states that:

Great River Energy has had multiple requests across its member systems’ service areas for potential large load installations. These loads have ranged from 2.5 MW to over a 1,000 MW. These requests have non-disclosure agreements and therefore are not communicated until the requesting party makes a decision to allow communication to other parties.

[...]

Xcel Energy has several large load requests across the Northern States Power footprint that range from several hundred MWs to over 1 GW. These studies have a non-disclosure agreement that unless the interconnection requestor makes it public, we are withholding information until then.

Based upon review of the above information the Department concludes that the Report includes the required list of transmission studies.

E. TRANSMISSION FOR RENEWABLES

The Report also contains a section regarding transmission upgrades necessary to support resources required to meet Minnesota’s Renewable Energy Standard (RES) as required by Minn. Stat. § 216B.2425, subd. 7.¹⁷ The Report’s analysis of RES requirements is a joint effort by a separate group

¹⁶ The studies focused on Austin, Willmar, and GETs.

¹⁷ See [Minn. Stat. § 216B.2425, subd. 7.](#)

from the MTO but containing many of the same utilities (RES Utilities).¹⁸ Minn. Stat. § 216B.2425, subd. 7 states:

Each entity subject to this section shall determine necessary transmission upgrades to support development of renewable energy resources required to meet objectives under section 216B.1691 and shall include those upgrades in its report under subdivision 2.¹⁹

In addition, the Report mentions the Commission's August 19, 2020 *Order Accepting Report, Granting Variance, and Setting Additional Requirements*, which states:

The MTO shall provide a full discussion and analysis of next steps for identifying gaps between the existing and currently planned transmission system and the transmission system that will be required to meet the companies' publicly stated clean energy goals. The MTO shall also address any need for new or expanded transmission to accommodate –

- 1) the public clean energy commitments of the MTO member utilities,
- 2) the requirements in all approved Minnesota resource plans, and
- 3) relevant Minnesota statutory goals.²⁰

As background, the RES Utilities begin by citing the Minnesota Renewable Energy Standard Utility Compliance report (RES compliance report), a Department report that concluded that all utilities have satisfied their respective renewable and solar energy standards compliance requirements for 2023.²¹ The RES compliance report also noted that OTP is the only utility having difficulty meeting the small-scale solar component of the solar energy standard (SES). Table 3 of the RES compliance report summarizes how far into the future each utility expects to be able to comply.

The Report then performs a gap analysis, which provides “an estimate of how many more megawatts of renewable generating capacity a utility expects it will require beyond that which is presently available to obtain the required amount of renewable energy.”²² According to the chart on page 235 of the Report, the RES Utilities, as a whole, have sufficient capacity acquired to meet the Minnesota RES needs for Minnesota and other jurisdictions through 2030.²³

According to Table 2 of the Report three RES Utilities need additional renewable capacity for Minnesota RES needs by 2030, totaling 2,434 MW.²⁴ In 2035 five utilities are short by a total of 6,140

¹⁸ The utilities sponsoring the RES Report are: MP, Xcel, OTP, Basin Electric Power Cooperative, DPC, EREPC, GRE, LOPC, MPC, CMMPA, MMPA, SMMPA, Western Minnesota Municipal Power Agency (WMMPA)/MRES, and Heartland Consumers Power District (jointly, the RES Utilities).

¹⁹ [Minn. Stat. § 216B.2425, subd. 7](#) (2024).

²⁰ *In the Matter of the 2019 Minnesota Biennial Transmission Projects Report, Order Accepting Report, Granting Variance, and Setting Additional Requirements*, August 19, 2020, Docket No. E999/M-19-205, (eDockets) [20208-166007-01](#), at order point 5c.

²¹ The most recent report is available at [2025 Minnesota Renewable Energy Standard Utility Compliance](#).

²² Report at 233.

²³ Report at 235.

²⁴ Report at 236. The short utilities are RPU, WMMPA/MRES, and Xcel.

MW.²⁵ Regarding the SES, Table 4 of the Report shows Xcel needs to add 1,181 MW of solar capacity in 2035.²⁶

The Report states that “[b]ecause the Commission has pending dockets on compliance with the CFS, this 2025 Biennial Report includes the status of utilities’ efforts to meet the RES standards but does not yet include a gap analysis related to the CFS.”²⁷ However, Table 5 does show a Minnesota and non-Minnesota CFS need estimate for each utility.²⁸

Table 6 of the Report does show that three utilities are planning on adding renewable capacity by 2030 to comply with Minnesota’s Carbon Free Standard (CFS).²⁹ Note that the column headers are not clear; column labels of Table 6 of the Report should be similar to those of Table 2.³⁰ By 2040 five utilities are planning on addition renewable capacity.³¹

The Report concludes by stating:

MTO utilities continue to make tangible progress to satisfy RES and SES requirements. Though generally encouraged by this progress, MTO utilities emphasize that continuing progress is also closely linked to the ability to procure the necessary transmission resources, which is analyzed throughout this Report. Further, MTO utilities continue to analyze the Commission’s implementation of the CFS and how compliance with the CFS may impact transmission needs and anticipate providing additional information in the next biennial report in 2027.³²

Overall, the Department concludes that the RES Utilities, as a whole, are showing a significant need for new generation for the purposes of the RES, SES, and CFS; thus, additional transmission is potentially required in the near future. There are several large transmission lines that have recently been approved or are in process the CN and/or routing processes at the Commission that may help address the need for transmission for additional renewable energy.

F. DISTRIBUTION REPORT AND GRID MODERNIZATION

Minn. Stat. § 216B.2425, subd. 8 states:

Each entity subject to this section that is operating under a multiyear rate plan approved under section 216B.16, subdivision 19, shall conduct a distribution study to identify interconnection points on its distribution system for small-scale distributed generation resources and shall identify

²⁵ Report at 236. The short utilities are CMMPA, RPU, SMMPA, WMMPA/MRES, and Xcel.

²⁶ Report at 237.

²⁷ Report at 2.

²⁸ Regarding the estimates in Table 5, OTP actually does not have any CFS requirements outside of Minnesota; IR Responses at No. 3. DPC also does not have any CFS requirements outside of Minnesota; IR Responses at No. 4.

²⁹ See [Minn. Stat. § 216B.1691.2g](#) for the CFS. The utilities that appear to be adding capacity are CMMPA, RPU and Xcel.

³⁰ IR Responses at No. 5.

³¹ The utilities are CMMPA, MP, RPU, SMMPA, and Xcel.

³² Report at 239.

necessary distribution upgrades to support the continued development of distributed generation resources, and shall include the study in its report required under subdivision 2.³³

Minn. Stat. § 216B.2425, subd. 2 (e) states:

In addition to providing the information required under this subdivision, a utility operating under a multiyear rate plan approved by the commission under section 216B.16, subdivision 19, shall identify in its report investments that it considers necessary to modernize the transmission and distribution system by enhancing reliability, improving security against cyber and physical threats, and by increasing energy conservation opportunities by facilitating communication between the utility and its customers through the use of two-way meters, control technologies, energy storage and microgrids, technologies to enable demand response, and other innovative technologies.³⁴

Regarding these requirements, the Report states that Xcel is the only utility currently operating under a multiyear rate plan and thus is the only utility required to file a grid modernization plan and a distribution study.³⁵ The Report contains a table that shows the dockets in which Xcel filed distribution and grid modernization reports.³⁶

Since the Biennial Distribution and Grid Modernization Reports are filed in separate dockets, the Department will not comment on those reports in this proceeding.

G. NON-WIRE ALTERNATIVES

Section 2.7 of the Report discusses non-wire alternatives and Section 2.8 discusses Federal Energy Regulatory Commission (FERC), Midcontinent Independent System Operator, Inc. (MISO), and Grid North Partners³⁷ (GNP) actions regarding congestion, distributed energy resources (DER) and distribution planning in response to the Commission's June 12, 2018 *Order Accepting Report, Granting Variance, and Setting Additional Requirements*.³⁸

Section 2.7 of the Report includes a discussion of non-wire alternatives to transmission projects, such as new operating guides or procedures, demand side management, distributed generation, and storage of electricity and a table summarizing the options and describing the benefits and challenges of each alternative. The MTO indicated that specific non-wires alternatives are considered when evaluating solutions to a particular transmission inadequacy. Non-wire alternatives are discussed in the context of particular transmission needs in Chapter 6 of the Report.

³³ See [Minn. Stat. § 216B.2425, subd. 8.](#)

³⁴ See [Minn. Stat. § 216B.2425, subd. 2.](#)

³⁵ Report at 12.

³⁶ Report at 13.

³⁷ Grid North Partners member utilities include CMMPA, DPC, GRE, MP, MRES, OTP, RPU, SMMPA, WPPI Energy, and Xcel.

³⁸ *In the Matter of the 2017 Biennial Transmission Projects Report*, Order Accepting Report, Granting Variance, and Setting Additional Requirements, June 12, 2018, Docket No. E999/M-17-377, (eDockets) [20186-143760-01](#) at Order Point 2.

Section 2.8 of the Report contains a discussion of FERC and MISO related to distributed energy resources and distribution planning. The Report discusses FERC's Order No. 2023, the creation of the MISO DER Affected System Study (AFS), and MISO's FERC Order No. 841 compliance filing, among other issues.

Finally, the Department notes that the Report discusses recent actions announced by Grid North Partners (GNP). GNP participated in the development of MISO's Long-Range Transmission Planning process, which resulted in numerous 345 kV transmission projects across the MISO-North footprint. Also, GNP reviewed historical and projected transmission system congestion in the MISO market as part of an effort to identify potential system upgrades that could reduce congestion in the GNP footprint. The Report states that GNP's congestion effort was completed in 2023 and at least 21 projects from several GNP member companies are underway to increase transmission capacity and reduce market congestion in the GNP footprint.

In addition to the Commission required information Section 2.8 of the Report contains a discussion of activities at the Institute of Electrical and Electronics Engineers (IEEE) and at the Electric Power Research Institute (EPRI).

Based upon review of the above information the Department concludes that the Report complies with the Commission's requirements regarding non-wire alternatives.

H. COORDINATION WITH MISO

The Commission's August 19, 2020 *Order Accepting Report, Granting Variance, and Setting Additional Requirements* at Order Point 5(d) states:

The MTO shall describe its efforts to engage with MISO to ensure that Minnesota's transmission needs have been met, and shall provide an assessment of whether MISO has been responsive to Minnesota's identified and likely transmission needs.³⁹

In addition, while not directly related, the Report mentions the Commission's June 29, 2022 *Order Accepting Report* at Order Point 6, which states:

MTO must file, within 90 days, additional information as set forth in ordering paragraph 5(d) of the Commission's August 19, 2020, order, in Docket E-999/M-19-205, which required a filing within 90 days that included "an assessment of whether MISO has been responsive to Minnesota's identified and likely transmission needs."⁴⁰

Section 2.9 of the Report discusses MTO's coordination with MISO and concludes that "MTO believes MISO has been responsive to Minnesota's identified and likely needed transmission, recognizing a

³⁹ *In the Matter of the 2019 Biennial Transmission Projects Report, Order Accepting Report, Granting Variance, and Setting Additional Requirements*, August 19, 2020, Docket No. E999/M-19-205, (eDockets) [20208-166007-01](#) at Order Point 5(d).

⁴⁰ *In the Matter of the 2021 Biennial Transmission Projects Report, Order Accepting Report, June 29, 2022, Docket No. E999/M-21-111, (eDockets) [20226-186966-01](#) at Order Point 6.*

number of challenges that abate progress in these areas.”⁴¹ To illustrate this responsiveness, the Department notes that MISO’s *MTEP Approved Project Quarterly Status Reporting* presentation shows that, of projects currently active, about 48 percent are in the West region.⁴²

Based upon review of the above information the Department concludes that the Report complies with the Commission’s requirements regarding coordination with MISO.

I. DISCUSSION TOPICS LISTED IN THE NOTICE

I.1. Completeness

The first issue specified in the Notice is “Is the Biennial Transmission Projects Report (Report) complete.”

As stated in the Department’s November 19, 2025 letter, 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.

I.2. Representations Made in the Report

The second issue specified in the Notice is “Are there questions or concerns regarding the representations made in the Report?”

As indicated by the above analysis, the Department does not have any questions or concerns regarding the representations made in the Report. Therefore, the Department recommends the Commission accept the Report.

I.3. Granting the Waiver

The third issue specified in the Notice is “Should the Commission continue to grant the waiver to the public meeting and related notice requirements for the next Report cycle?”

As stated above, the Department recommends the Commission grant the variances requested by MTO.

I.4. Prior Orders

The fourth issue specified in the Notice is “Does the report comply with, and is the information sufficient to meet the requirements in the Commission’s Orders issued on March 24, 2025, in Docket No. E-999/CI-24-316 and June 7, 2024, in Docket No. E-999/M-23-91?”

The Commission’s March 24, 2025 order in Docket No. E-999/CI-24-316 required:

⁴¹ Report at 23.

⁴² MISO, *20251203 PSC Item 03b MTEP Approved Project Quarterly Status Report*, (2025), <https://cdn.misoenergy.org/20251203%20PSC%20Item%2003b%20MTEP%20Approved%20Project%20Quarterly%20Status%20Report729669.pdf> at slide 6.

1. The MTOs shall include a cost-benefit analysis in their 2025 Biennial Transmission Report that compares any feasible battery storage solution to status quo conditions and to its performance under planned grid upgrades at the Nobles County Substation area.
2. In the 2025 Biennial Transmission Projects Report, the MTOs shall include an update of the WECS curtailment and economic impact data as provided in the Department's December 3, 2024 supplemental comments for the Nobles County Substation area and the areas of congestion identified as part of the GETs Study required under the 2024 Session Laws Ch. 126, article 6, section 52, subd. 2. In addition, the MTOs shall consult with the Department in preparation for the 2025 Biennial Transmission Projects Report.⁴³

MTO addressed the 24-316 Order in section 9.6, Appendix C, and Appendix D of the Report. The 24-316 Order's point 1, regarding cost-benefit analysis for a battery is addressed in Appendix C of the Report.⁴⁴ The analysis shows substantial benefits for a 300 MW, 1,200 MWh BESS interconnected to the Nobles County Substation. The 24-316 Order's point 2, regarding updating wind curtailment and economic impact data, was addressed in Appendix B at pages 117-119 and 178. Note that the data is in a different format from that shown in the Department's December 3, 2024 supplemental comments but the concepts of physical and economic impact are both addressed. The Department concludes that this data adequately addresses the 24-316 Order.

The Commission's June 7, 2024, in Docket No. E-999/M-23-91 requires:

6. The Commission will require the MTO to file a 2025 Report that meets the requirements of Minn. Stat. § 216B.2425, subd. 2, and contains content similar to the 2023 Report. Additionally, for all future Biennial Transmission Projects Reports, the Commission will require the MTO, beginning with the 2025 Report, to provide the following:
 - A. An update on the progress and/or performance of the Grid North Partners' proposal for nineteen transmission upgrade projects aimed at enhancing reliability and easing congestion in Minnesota;
 - B. Information about short-term solutions to increase the robustness of the transmission system they have deployed or plan on deploying along with a report on their performance such as:
 1. dynamic line ratings,
 2. transmission system optimization and reconfigurations,
 3. adjusting transmission conductor limitations to increase line ratings,

⁴³ *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](#), (hereinafter "24-316 Order").

⁴⁴ Note that Appendix C indicates that further cost-benefit analysis is underway.

4. increasing substation limiter sizes, and
 5. other grid enhancing technologies that they have deployed or plan on deploying; and
- C. Updates to its response to the PUC Information Requests from May 12, 2023.⁴⁵

Order Point 6 A, regarding an update on the progress of the Grid North Partners' nineteen transmission upgrade projects, is addressed in Table 1 on pages 244-245 of the Report. Order Point 6 B, regarding short-term solutions, is addressed in Appendix B of the Report. Order Point 6 C, regarding an update to various Commission Staff Information Requests, is addressed in Section 11.6 on pages 254-263 of the Report. The Department concludes that this data adequately addresses the 23-91 Order.

1.5. Other Issues

The fifth issue specified in the Notice is "Are there other issues or concerns related to this matter?"

The Department has no other issues or concerns at this time.

IV. DEPARTMENT RECOMMENDATIONS

Based on analysis of the information in the record, the Department has prepared recommendations, which are provided below. The recommendations correspond to the subheadings of Section III above.

B. VARIANCE REQUESTS

- The Department recommends the Commission grant the requested variances.

I. VARIANCE REQUESTS

- I.1. The Department recommends the Commission take no action regarding completeness.
- I.2. The Department recommends the Commission accept the Report.

⁴⁵ 23-91 Order at 5-6.

Attachments

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-25-99

Dated this 15th day of **January 2026**

/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	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