

April 3, 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 submits this Response to Information Request Number 4 and 5 to Minnesota Public Utilities Commission’s Information Request 4-9, dated March 23, 2026.

These information request responses have been e-filed through www.edocket.state.mn.us.

Please let me know if you have any questions regarding this filing.

Sincerely,

FREDRIKSON & BYRON, P.A.



David R. Moeller
Direct Dial: (612) 492-7422
Email: drmoe@fredlaw.com

**MINNESOTA TRANSMISSION OWNERS
INFORMATION REQUEST RESPONSE**

- Public Document**
- NONPUBLIC Document – Not For Public Disclosure**
- Public Document – Nonpublic Data Has Been Excised**

Supplemental Information Request No. 4 & 5

Project: 2025 Minnesota Biennial Transmission Projects Report

MPUC Docket No.: No. E999/M-25-99

Response To: Minnesota Public Utilities Commission

Requestor: Hirsi Mohamed, Craig Janezich and Isabel Ricker

Date of Request: March 23, 2026 Response Due Date: April 2, 2026

IR#4 For MTO:

For the transmission investments identified in the 2025 Biennial Transmission Projects Report, provide a quantitative estimate of economic benefits that Minnesota customers can expect to receive, including avoided congestion costs and lower wholesale electricity costs. If a quantitative estimate is not available, provide a narrative discussion.

RESPONSE: The MTO did not conduct specific economic analysis for the 2025 Biennial Transmission Projects Report (BTTPR) and thus that requested analysis is not available. The 2025 BTTPR includes over 150 transmission projects spanning a range of system needs. Projects range from local load serving improvements with age and condition rebuilds to regional transmission portfolios such as the MISO/SPP JTIQ and MISO LRTP Tranches 1 and 2.1 projects. While many projects simultaneously provide multiple benefits (e.g. reliability and economic), each project generally has a primary driver.

Economic benefits/congestion is one driver for transmission projects in Minnesota and in total ten of the projects explicitly mention congestion as a driver. Many of the projects included in the report are currently expected to have limited impact on congestion because they involve upgrades to non-congested facilities for non-congestion reasons. Congested facilities were the focus of the GETs study. This is not to say that projects beyond the noted ten above would not lead to reductions in congestion or other economic benefits. Projects like the aforementioned LRTP lines have significant congestion benefits that were studied as part of the MISO LRTP process and

Preparer: David Moeller
Title/Company: Fredrikson & Byron, P.A.
Email: drmoeller@fredlaw.com
Telephone: 612-492-7422
Response Date: April 3, 2026

some line upgrades driven by reliability needs may also have congestion benefits that were not captured via economic analysis because reliability needs provided sufficient project justification.

Each of the facilities driven by congestion has a project-specific, or portfolio-specific for the MISO LRTP projects, economic benefit; however, the MTO have not performed analysis to calculate the economic benefits for all the projects in the 2025 BTPR. Reviewing potential congestion and wholesale electricity cost benefits for every project is beyond the scope of the BTPR and would require significant technical effort to allow for proper modeling and analysis. Furthermore, the statute requiring the biennial transmission plan filing provides that transmission owners: “identify general economic, environmental, and social issues associated with each alternative.” Minn. Stat. § 216B.2425, subd. 2(c)(3).

The projects considered in the GETs report used historical congestion data for justification. For the three years of consideration required by the study (2022, 2023, 2024), transmission owners considered each constraint's annual congestion charge (Facility Ratings * Constraint Shadow Price) to determine benefits for eliminating congestion. This data has been included in attached spreadsheet for reference and is also found in the Appendix B GETs Report. Note that the effect on wholesale electricity costs was not in the GETs Report scope and thus was not calculated.

IR#5 For each transmission owner:

The U.S. Department of Energy announced a \$1.9 billion funding opportunity on March 12 called [Speed to Power through Accelerated Reconductoring and other Key Advanced Transmission Technology Upgrades \(SPARK\)](#). The funding opportunity aims to support upgrades to existing infrastructure using reconductoring and other advanced transmission technologies to expand capacity and lower electricity costs.

Is your company planning to pursue this funding opportunity? Provide a narrative explaining how you are pursuing the funds or why not.

RESPONSE: Response by MTO Member:

ATC

ATC is engaged in evaluating this funding opportunity, but given that ATC only owns 12-miles of transmission assets in the state of Minnesota (a line segment that is part of the Arrowhead - Stone Lake 345-kV line), any reconductoring or other advanced transmission technologies funded by SPARK would have limited impact on capacity or electricity costs in the state of Minnesota.

Dairyland Power Cooperative (DPC)

DPC is pursuing funding under this grant and will be submitting as part of a consortium of projects through the National Rural Electric Cooperative Association (NRECA). DPC is exploring GET options such as advanced conductor and grid topology optimization. DPC is also exploring the use of advanced wildfire cameras.

East River Electric Power Cooperative

We are not participating in the SPARK program at this time as we are pursuing grant opportunities through the DOE under the IJJA’s Grid Resiliency and Innovation Partnership (GRIP) program for other reconductoring projects.

Great River Energy (GRE)

GRE is planning on pursuing U.S. Department of Energy’s SPARK funding opportunity to deploy a suite of grid enhancing technologies across its transmission system. The proposed effort leverages new and existing partnerships to improve real time system awareness and capacity utilization at targeted locations on our transmission system to improve real time system awareness and operational flexibility. Together, these investments will enable more proactive operations, faster restoration during system events, and greater reliability for the communities we serve.

Since 2022, GRE has pursued many competitive funding programs, including approximately \$95 million in applications under the Grid Resilience and Innovation Partnerships (GRIP) program in 2023, which were not awarded. GRE continued these efforts in the second round of GRIP in 2024 and was successful in one of two applications as part of a consortium led by the National Rural Electric Cooperative Association (NRECA). GRE has also pursued, but was not awarded, funding through two Joint Assessment of Resilience in Vulnerable Infrastructure Systems (JARVIS) applications and an application to the Energy Improvements in Rural or Remote Areas (ERA) program. Collectively, these efforts demonstrate GRE’s continued commitment to evaluating and leveraging federal funding opportunities where appropriate, to advance transmission performance, resilience, and value for our member-owners.

ITC Midwest

ITC Midwest is not currently planning to pursue this funding opportunity for any assets located in Minnesota. ITC Midwest is tentatively considering requesting SPARK funding for a reconductoring effort in Iowa on the MISO-PJM seam. Note that because of the short timeline for application, ITC has largely only been able to consider “shelf-ready” projects that have existing documentation, meet grant minimum requirements, and quick coordination from partners.

L&O Power Cooperative

L&O Power Cooperative has no transmission capacity upgrades or infrastructure rebuilds in Minnesota included in our current capital improvement plan and, therefore, does not plan to pursue this funding opportunity.

Minnesota Power

Minnesota Power does not plan to pursue funding through the Department of Energy’s SPARK program at this time, as it has not identified qualifying projects on its system that can be implemented within the timeframe and technical requirements required by the SPARK program.

Minnkota Power Cooperative

Minnkota Power Cooperative is not pursuing any SPARK funding individually; however, Minnkota continues to review opportunities and may pursue SPARK funding as part of a consortium.

Missouri River Energy Services (MRES)

MRES does not plan to pursue this funding opportunity, as we do not believe that we have an identified need at this time. MRES has not established an identified need or complimentary transmission plan to support pursuing the funding opportunity. A need would first be identified, and an appropriate transmission plan established, to pursue such funding opportunities.

Otter Tail Power (OTP)

OTP is actively, or has been actively, engaged in numerous transmission planning processes and studies including the MISO Transmission Expansion Planning, Long Range Transmission Plan, MISO/SPP Joint Targeted Interconnection Queue, MN GETs analysis, and others, in which no projects for OTP have currently been identified that fit this opportunity. However, OTP is working with a university on a potential SPARK partnership for Topic Area 2: Smart Grid.

Xcel Energy

Yes, the Company is planning to pursue the U.S. Department of Energy's SPARK funding opportunity.

We view federal funding opportunities such as this as an important strategic tool to advance system resiliency, expand transmission capacity, support emissions-reduction goals, and manage customer costs. The Company has a structured process to evaluate, pursue, and manage federal grants and other government funding opportunities, which begins with assessing eligibility and alignment with our strategic priorities.

Our general framework for deciding whether to pursue a funding opportunity includes the following considerations:

1. Whether the Company is an eligible applicant or can partner with an eligible prime applicant (e.g., developer, government entity, etc.);
2. Whether the opportunity aligns with the Company's strategic priorities; and
3. Whether relevant business and subject-matter leads support pursuing the opportunity and have sufficient resources to develop and manage the application, if selected.

Consistent with this framework, we are evaluating potential projects for inclusion in application(s) under the SPARK program's three topic areas and anticipate submitting one or more applications. As required by the Notice of Funding Opportunity, any proposed projects would not already be included in the Company's existing forecasts or current financial plans.

We view SPARK as being well aligned with our commitment to provide reliable, resilient and increasingly clean power while keeping customer bills as low as possible. We are considering a portfolio of advanced transmission technologies (ATTs) across our operating companies, which may include reconductoring, advanced power flow control technologies, dynamic line rating, topology optimization, and other potential ATTs identified as priorities by the Department of Energy.