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February 27, 2026

Via e-filing

Sasha Bergman
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place e, Suite 350
St. Paul, MN 55101

Re: Comments of the Rural Minnesota Energy Board

Docket No. 25-99

Introduction

The Rural Minnesota Energy Board (RMEB) appreciates the opportunity to provide these reply comments to the Minnesota Public Utilities Commission (PUC) related to the 2025 Grid Enhancing Technologies Report contained in the 2025 Biennial Transmission Projects Report initially filed with the PUC by the states' transmission-owning utilities on October 31, 2025. We provide these written comments to emphasize points raised by prior commentors and to highlight the importance of taking a holistic approach to solving grid needs and expanding grid capacity.

About Rural Minnesota Energy Board (RMEB)

The Rural Minnesota Energy Board is a joint powers board of 18 counties in southern Minnesota. The board was formed to provide policy guidance on issues surrounding energy development in rural Minnesota. Originally formed in 1996 as the Ridge Counties Task Force, it evolved into the Wind Task Force, the SW Minnesota Energy Task Force, and the Rural Minnesota Energy Task Force as both membership and policy issues expanded. The initial focus on wind energy has broadened to include renewable energy and transmission issues.

Comments

Comments raised by both the Minnesota Department of Commerce Division of Energy Resources (DOC DER)¹ and the Working for Advanced Transmission Technologies (WATT) Coalition² in previous filings raise questions and concerns that reflect similar concerns of RMEB members. Broadly, RMEB seeks to ensure the Minnesota Transmission Owners (MTO) fully consider GETs in all applicable planning situations alongside traditional transmission solutions and make investment decisions that capture broad benefits and costs to customers across Minnesota. RMEB recommends GETs Reports filing requirements are updated to achieve the following objectives.

1. Consider broader range of costs and benefits in GETs benefit cost analyses

RMEB members receive production tax credits for every MWh of electricity produced by wind facilities within our respective communities and rely on this tax revenue to fund essential public services. According to the DOC DER comments on Docket No. E999/CI-24-316³, wind facilities provided \$16,838,491 in tax revenue for Minnesota counties in 2023.⁴

Persistent transmission congestion in southwestern Minnesota poses serious risks to RMEB members, as tax revenues have declined in recent years due to wind curtailments resulting from transmission congestion. For example, the Murray County Board of Commissioners reported a loss of \$398,094 of revenue between 2019–2021 and 2023–2024 due to curtailments resulting from transmission congestion.⁵

Expected revenue losses or gains are not currently considered by the MTO in GETs cost benefit analyses. As noted in DOC DER's comments submitted to this docket, MTO can use financial transmission rights to financially hedge against transmission congestion.⁶ However, RMEB members cannot financially hedge against curtailment risk. As such, the MTO should consider potential losses or gains to county and municipal tax revenue in calculations of costs and benefits of implementing GETs.

¹ *In the Matter of the 2025 Minnesota Biennial Transmission Projects Report*, Minnesota Department of Commerce, Comments, Docket No. E999/M-25-99, February 2, 2026, (eDockets) [20262-227728-02](#). (hereinafter "Department of Commerce 25-99 Comments").

² *In the Matter of the 2025 Minnesota Biennial Transmission Projects Report*, Working for Advanced Transmission Technologies (WATT) Coalition, Docket No. E999/M-25-99, February 2, 2026, (eDockets) [20262-227734-01](#). (hereinafter "WATT Comments").

³ *In the Matter of the Investigation into Transmission-Curtailment Matters, Drivers, and Potential Solutions to Limitations Resulting from Nobles County Substation*, Minnesota Department of Commerce, Comments, Docket No. E999/CI-24-316, October 23, 2024, (eDockets) [202410-211261-02](#) (hereinafter "Department of Commerce 24-316 Comments").

⁴ Department of Commerce 24-316 Comments at 1.

⁵ Department of Commerce 24-316 Comments at 4.

⁶ Department of Commerce 25-99 Comments at 7.

2. Evaluate all GETs and advanced conductor technologies for grid expansion needs

As described in comments by the WATT, the MTO only considered the deployment of dynamic line rating and advanced ambient rating GETs technologies.⁷ These are not the only GETs and advanced grid technologies available to the MTO today. As a result of this artificial limitation of GETs consideration, technologies like topology optimization and advanced conductors were not considered. Moreover, the use of a standardized 5-year payback period across all GETs technologies may artificially limit the viability of GETs solutions in cost benefit analyses, especially those that may provide significant net benefits to rate payers over the 6-10 year timeframe which is still shorter than the 20-year payback period typically used to approve traditional transmission investments. RMEB urges the PUC and MTO to fully consider all available GETs technologies with appropriate payback periods to ensure GETs are considered alongside traditional transmission solutions for all known transmission needs.

3. Evaluate GETs solutions for all known transmission constraints and needs

According to the comments submitted by the DOC DER, the MTO identified 66 transmission constraints in the previous three years, including those identified before the passage of the 2024 GETs Law.⁸ The DOC DER also rightly calls attention to additional congestion expected to arise as the MISO LRTP Tranche 1 and 2.1 projects are constructed and energized in Minnesota. GETs can provide immediate congestion relief across the Minnesota transmission grid and support reliability and affordability for Minnesota's ratepayers and revenue certainty for wind generation site hosts during this expected time of increased congestion on the Midcontinent transmission system.

Conclusion

The RMEB appreciates the opportunity to comment on the 2025 GETs Report and the 2025 Biennial Transmission Project Report. RMEB members play a critical role in maintaining the growth of renewable generation in Minnesota to help the state meet its reliability, affordability, and clean energy goals. RMEB appreciates the work to date by the MTO to consider and deploy GETs alongside critical regional backbone transmission infrastructure and looks forward to working with the MN PUC, MTO, and other stakeholders to support the future transmission grid our state needs.

Sincerely,

Dennis Welgraven
Chair, Rural Minnesota Energy Board

⁷ WATT Comments at 2.

⁸ Department of Commerce 25-99 Comments at 5-6.