

June 27, 2025

Will Seuffert
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 Mr. Seuffert:

The Department's preferred decision options in Docket No. E999/M-25-99 are 1, 2, 6 Modified, 8, 11, 12 Modified, 14, 15 Modified, 17, 18, 19, and 20. The modified decision options are listed as follows:

6 Modified: Transmission owners shall include in the 2025 GETs Implementation Plan a schedule and cost estimate to install GETs at each congestion point identified, **with the payback period set to the useful life of the project or the anticipated duration of congestion, whichever is less.**

12 Modified: In the 2025 GETs Report, **until at least ten new cost-effective projects based on the methodology developed by the Commission have been identified in Minnesota**, transmission owners shall evaluate and compare:

- (i) combinations of GETs,
- (ii) combinations of GETs with traditional upgrades, and
- (iii) traditional upgrades such as transformer or substation upgrades.

15 Modified: Transmission owners shall consider, and quantify to the maximum reasonable extent, the following costs and benefits when calculating the cost effectiveness of each potential GET deployment studied for the 2025 GETs Report:

Costs:

- A. The capital, O&M, **rate of return, and other** costs of the GETs project (MTO, DOC, WATT)
- B. The capital and O&M costs of any physical or cyber security investments necessary for implementation of the GET(s) (MTO)
- C. The following costs, if not otherwise included in capital or O&M:
 - i. Cost of design work and installation (MTO, WATT)
 - ii. Cost of licensing (MTO, WATT)
 - iii. Cost of outages during construction (MTO, WATT)
 - iv. Incremental wear and tear from reconfiguration, if applicable (WATT)

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Benefits:

- D. Avoided costs of energy (MTO, WATT)
- E. Avoided costs of outages (MTO, EDFR)
- F. Ability to serve more load (MTO)
- G. Ability to perform maintenance in opportune windows (MTO)
- H. Reduced renewable curtailment (DOC, EDFR, WATT)
- I. Reduced transmission congestion (DOC, EDFR, WATT)
- J. Reduced price differentials (DOC)
- K. **Avoided or deferred assets including capital costs and the rate of return etc.** (DOC)
- L. Improved situational awareness (DOC, EDFR, WATT)
- M. Resilience and contingency support (DOC, EDFR, WATT)
- N. Asset health monitoring (DOC, EDFR, WATT)
- O. Reduced cost of new interconnection (DOC, EDFR, WATT)
- P. Improved transfer capability across regions (EDFR, WATT)
- Q. Ability to advance state policy aims (EDFR)

Sincerely,

/s/ Sydnie Lieb, Ph.D.

Assistant Commissioner, Office of Regulatory Analysis

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 **27th** day of **June 2025**

/s/Sharon Ferguson

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	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
2	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
3	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
4	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
5	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
6	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
7	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		No	Official 25-99
8	Julia	Selker	jselker@gridstrategiesllc.com	WATT Coalition		110 Allen St Suite A&B Cumming GA, 30040 United States	Electronic Service		No	Official 25-99
9	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	Official 25-99
10	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