

December 12, 2025

**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. E/999/M-25-99**

Dear Ms. Bergman:

The Minnesota Transmission Owners (“MTO”) respectfully submits these responses to the Minnesota Department of Commerce Information Requests Nos. 1 – 5.

These responses have been e-filed through [www.edocket.state.mn.us](http://www.edocket.state.mn.us). A copy of this filing is also being served upon the persons on the Official Service List of record.

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:** [drmoeller@fredlaw.com](mailto:drmoeller@fredlaw.com)



Minnesota Department of Commerce  
85 7th Place East | Suite 280 | St. Paul, MN 55101  
Information Request

Docket Number: E999/M-25-99

Requested From: Christine Schwartz, regulatory.records@xcelenergy.com

Type of Inquiry: General

Nonpublic  Public

Date of Request: 12/2/2025

Response Due: 12/12/2025

SEND RESPONSE VIA EMAIL TO: [Utility.Discovery@state.mn.us](mailto:Utility.Discovery@state.mn.us) as well as the assigned analyst(s).

Assigned Analyst(s): Steve Rakow

Email Address(es): stephen.rakow@state.mn.us

Phone Number(s): 651-539-1833

**ADDITIONAL INSTRUCTIONS:**

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

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**Request Number:** 1

Topic: Click or tap here to enter text.

Reference(s): Click or tap here to enter text.

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**Request:**

Please explain why the Fairmont, MN Area Transmission Expansion project (tracking number 2023-SW-N10) is listed on page 172 as requiring a Certificate of Need when the discussion of the project involves only 69 kV transmission lines.

**Response:**

A Certificate of Need is not required for the Fairmont, MN Area Transmission Expansion project given the size of the transmission line and that was an error in this filing.

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To be completed by responder

Response Date: December 12, 2025

Response by: Minnesota Transmission Owners

Email Address: [drmoeller@fredlaw.com](mailto:drmoeller@fredlaw.com)

Phone Number: 612-492-7422



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Email Address(es): [stephen.rakow@state.mn.us](mailto:stephen.rakow@state.mn.us)

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**Request Number:** 2

Topic: [Click or tap here to enter text.](#)

Reference(s): [Click or tap here to enter text.](#)

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**Request:**

Please explain why the King Transmission Connection project (tracking number 2025-TC-N12) is listed on page 145 as requiring a Certificate of Need when the discussion of the project involves a 230 kV transmission line that appears to be less than 10 miles in length in Minnesota.

**Response:**

The King Transmission Connection project no longer requires a Certificate of Need (CN) due to the 2024 amendment to the Minnesota Infrastructure Permitting Act. Previously, a CN was required because the project crossed state lines. The amendment removed that requirement. We submitted an application for a Minor Route Alteration for this project, which was approved on August 12, 2025 in Docket No. E-002/TL-25-255. We will clarify in our reply comments.

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To be completed by responder

Response Date: December 12, 2025

Response by: Minnesota Transmission Owners

Email Address: [drmoeller@fredlaw.com](mailto:drmoeller@fredlaw.com)

Phone Number: 612-492-7422



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Assigned Analyst(s): Steve Rakow

Email Address(es): stephen.rakow@state.mn.us

Phone Number(s): 651-539-1833

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Request Number: 3

Topic: [Click or tap here to enter text.](#)

Reference(s): [Click or tap here to enter text.](#)

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Request:

Regarding Table 5 on page 238 of the Petition please explain why Otter Tail is listed as having non-Minnesota CFS requirements starting in 2030.

Response:

Otter Tail does not have any CFS requirements outside of Minnesota. The error in application in this filing was due to lack of understanding of the table with new staff and what "Non-MN CFS" is defined as. Otter Tail's Non-MN CFS forecast should have been "0" or "N/A" for each year.

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To be completed by responder

Response Date: December 12, 2025

Response by: Minnesota Transmission Owners

Email Address: [drmoeller@fredlaw.com](mailto:drmoeller@fredlaw.com)

Phone Number: 612-492-7422



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85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: E999/M-25-99

Requested From: Christine Schwartz, regulatory.records@xcelenergy.com

Type of Inquiry: General

Nonpublic Public

Date of Request: 12/2/2025

Response Due: 12/12/2025

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): Steve Rakow

Email Address(es): stephen.rakow@state.mn.us

Phone Number(s): 651-539-1833

ADDITIONAL INSTRUCTIONS:

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Request Number: 4
Topic: Click or tap here to enter text.
Reference(s): Click or tap here to enter text.

Request:

Regarding Table 5 on page 238 of the Petition please explain why DPC and Xcel Energy are listed as having non-Minnesota CFS requirements starting in 2030.

Response:

DPC does not have any CFS requirements outside of Minnesota. The Wisconsin RPS requirement was erroneously entered into the table. DPC's Non-MN CFS forecast should have been "0" or "N/A" for each year.

Xcel Energy is listed as having non-Minnesota Carbon-Free Standard (CFS) requirements starting in 2030 because the data incorporates Michigan's recently enacted carbon-free standard. Michigan law requires utilities to achieve 80% carbon-free generation by 2035 and 100% by 2040. The 2030 values in Table 5 reflect the need to begin developing carbon-free resources during the 2030-2034 timeframe to ensure compliance with the 80% requirement by 2035. This proactive development is necessary to meet Michigan's statutory targets and is therefore included in the non-Minnesota CFS numbers starting in 2030. These capacity values also account for the allocation of total NSP System resources across jurisdictions under the FERC-approved Interchange Agreement.

1 See MI Stat. § 460.1051, Sec. 51 (1) ("(1) As a clean energy standard, an electric provider shall achieve a clean energy portfolio of at least the following: (a) In 2035 through 2039, 80%. (b) In 2040 and each year thereafter, 100%.")

To be completed by responder

Response Date: December 12, 2025
Response by: Minnesota Transmission Owners
Email Address: drmoeller@fredlaw.com
Phone Number: 612-492-7422



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Email Address(es): stephen.rakow@state.mn.us

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**Request Number:** 5

Topic: [Click or tap here to enter text.](#)

Reference(s): [Click or tap here to enter text.](#)

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**Request:**

Regarding Table 6 on page 238 of the Petition please confirm the column labels should be similar to those of Table 2 or explain what Table 6 is showing.

**Response:**

We confirm that the column labels of Table 6 on page 238 should be similar to those of Table 2. We apologize for the confusion our labeling caused and will correct the Table 6 column labels in our reply comments.

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To be completed by responder

Response Date: December 12, 2025

Response by: Minnesota Transmission Owners

Email Address: [drmoeller@fredlaw.com](mailto:drmoeller@fredlaw.com)

Phone Number: 612-492-7422

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

**MPUC Docket No. E/999/M-25-99**

***CERTIFICATE OF SERVICE***

Abby Goshgarian certifies that on the 12th day of December, 2025, she e-filed true and correct copy the following document on behalf of the Minnesota Transmission Owners via eDockets (www.edockets.state.mn.us):

1. Responses to the Minnesota Department of Commerce Information Requests Nos. 1 – 5.

Said document was also served as designated on the Official Service Lists on file with the Minnesota Public Utilities Commission and as attached hereto.

Executed on: December 12, 2025

*Signed: /s/ Abby Goshgarian*

\_\_\_\_\_  
Fredrikson & Byron, P.A.

60 South Sixth Street

Suite 1500

Minneapolis, MN 55402

#	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