

Submission Description: (doc-less) Motion to Intervene of No CapX 2020 & Legalectric

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Dockets

EL25-109-000 Complaint of North Dakota Public Service Commission, et al. v. Midcontinent Independent System Operator, Inc. under EL25-109.

Filing Party/Contacts:

Filing Party	Signer (Representative)
Other Contact (Principal)	
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Basis for Intervening:
Motion to Intervene of No CapX 2020 & Legalectric under EL25-109-000

Basis for Intervention and Statement of Interest: As provided by FERC's Rule 214 and 18 C.F.F. 385.214(b), the intervention of No CapX 2020 and Legalectric is in the public interest. Similar to other non-utility intervenors, No CapX 2020 & Legalectric are frequent intervenors, participants, and commentators over decades in transmission and other dockets before the Minnesota Public Utilities Commission, Wisconsin Public Service Commission. Tranche 2 is particularly outrageous as it proposes a network of 765kV transmission across the Midwest, at extreme cost, and for what purpose? The issues raised in the North Dakota Public Service Commission, et al, Complaint are essentially several of those raised by No CapX 2020 and Legalectric (and in tandem with United Citizens Action Network, North Route Group, North Route Citizens Alliance, Citizens Energy Task Force in WI) in the CapX 2020, MISO MVP Portfolio Line 4, and MISO Tranche 1 dockets. Unlike other non-utility intervenors, and similar to the issues raised in North Dakota, et al, No CapX 2020 and Legalectric interests focus on the illegitimacy of a number of the cost/benefit categories and assumptions, and MISO's arbitrary and unsupported quantifying in these categories, upon which a determination of "need" is based. Failure to take into account transmission capacity freed up from fossil closures and that demand remains low, for example, Xcel Energy's 2024 peak demand is 1,500 MW lower than the 2006 peak -- 1,500 MW is more than the capacity of Xcel's two Prairie Island nuclear reactors. Also important is that the "benefits" are benefits to MISO members, and not ratepayers or the public. These are examples of material flaws in the cost/benefit analysis and subsequent allocation of costs. A large part of the claim of need for Tranche 2 and other transmission projects made by utilities and intervenors that conflate a desire for renewable energy with need for transmission, inexplicably intertwined, claiming that they are needed "for renewables" and to meet renewable energy goals and mandates. No CapX 2020 and Legalectric's position disagrees, and firmly rejects of central station generation, renewable or fossil that would require new transmission. Another example is that low-capacity-factor renewable energy transmitted over long distance is inherently inefficient and risks system stability due to line loss, and the cost of series compensation, reactive power, or additional generation to make up for line loss is omitted from cost calculations. These MISO transmission lines are NOT "needed for renewables" and instead, what is needed is focus on decrease of peak demand; thoughtful siting mindful of closure of fossil generation and load; focus of distributed generation near load; conservation; and efficiency. North Dakota's Exhibit 4, the report of the MISO Independent Monitor "brings inconvenient facts to light, as well as a different analysis," and raises some of these issues critical of the MISO process and results. No CapX 2020 and Legalectric support aspects of the North Dakota, et al, Complaint, from a perspective different from Complainants, and intervenes to pursue this advocacy.

No CapX 2020 and Legalectric will continue to intervene, participate, and comment in state transmission need and routing dockets as resources allow, but that requires involvement in each individual docket, and a look at the Tranche 2 projects shows at least eleven projects in Minnesota alone. This Complaint to FERC addresses the big picture, which is not possible in transmission dockets before state Commissions, and it is the most effective way to focus scrutiny on MISO's process and claims. It is unfortunate that this challenge was not raised about the MVP Portfolio and Tranche 1 projects which were based on similar cost/benefit analysis and cost allocation.

No other intervenor represents these interests of No CapX 2020 and Legalectric, the organizations that have been working in tandem on these issues, and the public interest.

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