

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

<div>North Dakota Public Service Commission Montana Public Service Commission Arkansas Public Service Commission Mississippi Public Service Commission Louisiana Public Service Commission</div> <div>Complainants v. Midcontinent Independent System Operator, Inc., Respondent</div>	<div>Docket No. EL25-109-000</div>
--	------------------------------------

**COMMENTS OF
MINNESOTA UTILITY REGULATORY AGENCIES
IN OPPOSITION TO COMPLAINT**

The Minnesota Public Utilities Commission and the Minnesota Department of Commerce, (collectively, “the Minnesota Utility Regulatory Agencies”) respectfully submit the following comments in opposition to the Complaint and associated request for expedited action and fast track processing against Midcontinent Independent System Operator, Inc. (MISO) filed by the North Dakota Public Service Commission, the Montana Public Service Commission, the Arkansas Public Service Commission, the Mississippi Public Service Commission, and the Louisiana Public Service Commission (collectively Complainants) in FERC docket no. EL25-109-000. The Minnesota Utility Regulatory Agencies, which are deeply committed to the continued reliability and affordability of the Midwestern grid, ask the Federal Energy Regulatory Commission (Commission) to deny the Complaint and the requested relief.

The Minnesota Utility Regulatory Agencies support the MISO's Long Range Transmission Planning (LRTP) process which produced the Tranche 2.1 portfolio because these high voltage

transmission lines will contribute to reliability throughout the entire Midwest region and are important to the continued economic vitality of the MISO region. The coordinated long-term regional planning in the LRTP process contributes to affordable service in the region in addition to ensuring the strength and reliability of the Midwestern grid. Furthermore, the Minnesota Utility Regulatory Agencies are concerned that a delay to the buildout of these Tranche 2.1 transmission lines will cause significant delay in MISO's interconnection studies for thousands of megawatts of new generation that Minnesota utilities need to serve their customers.

MISO's LRTP process that was used to develop the Tranche 2.1 portfolio was thorough, transparent, and collaborative. The Minnesota Public Utilities Commission, the Minnesota Department of Commerce, Minnesota utilities, and other Minnesota stakeholders contributed to the LRTP process. Even before the LRTP process began, the Minnesota Public Utilities Commission, supported by the Minnesota Department of Commerce, worked with OMS states through the Organization of MISO States to develop cost-allocation principles for long-range transmission planning.¹ Following this, MISO incorporated the comprehensive utility resource plans evaluated by the Minnesota Department of Commerce and approved by the Minnesota Public Utilities Commission, as well as the approved resource plans of other MISO states, into the MISO models used in this LRTP process.² MISO also sought and responded substantively to extensive feedback from numerous stakeholders, including feedback on the type, quantity, and location of new generation and on the methods for calculating the benefits of the Tranche 2.1 portfolio.³

For all the reasons explained above, the Minnesota Utility Regulatory Agencies respectfully request that the Commission consider these comments and reject the Complaint with prejudice. The Minnesota Utility Regulatory Agencies further requests any and all other appropriate relief.

¹ OMS Board of Directors *Organization of MISO States Statement of Principles re Long-Range Transmission Planning*, approved June 13, 2019 and sent to John Bear, MISO CEO, on June 14, 2019 ([link](#))

² MISO *Futures Data Refresh*, Planning Advisory Committee meeting, June 22, 2022 ([link](#))

³ MISO *Feedback Responses*, LRTP Workshop on Apr. 28, 2023 ([link](#))

Respectfully submitted,



Katie Sieben, Chair of the Minnesota Public Utilities Commission



Joe Sullivan, Vice Chair of the Minnesota Public Utilities Commission



John Tuma, Commissioner, Minnesota Public Utilities Commission



Hwikwon Ham, Commissioner, Minnesota Public Utilities Commission



Audrey Partridge, Commissioner, Minnesota Public Utilities Commission



Grace Arnold, Commissioner of the Minnesota Department of Commerce