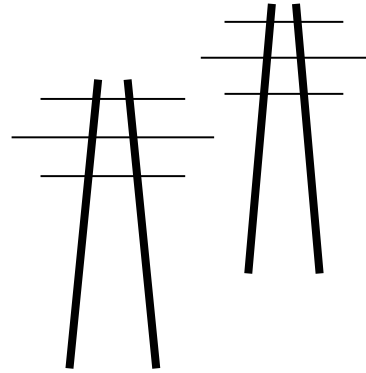


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September 10, 2025

Mike Bull
Acting Executive Secretary
Public Utilities Commission
121 – 7th Place East
St. Paul, MN 55101

via eFiling only

RE: Comment to Commission – FERC Intervenor No CapX 2020 and Legalelectric
North Dakota, et al. (“Concerned Commissions”) v. MISO
PUC Docket E999/PR-25-21

Dear Mr. Bull:

I read with dismay the Minnesota Utilities Regulatory Agencies’ Comment in the above-entitled docket. Attached please find MISO Independent Market Monitor Comment, September 8, 2025, and MISO IMM Comments on LRTP Tranche 2 Benefit Metrics, May 29, 2024.

MISO’s Independent Market Monitor filed Comments last night supporting the Concerned Commission’s Complaint, attached, laying out the problems with MISO’s benefit calculations. Last May, MISO’s Independent Market Monitor filed its report, also attached, noting these same issues. Earlier, “benefit” issues were raised by Jewell-Jinkins Intervenor in the Cardinal-Hickory Creek Wisconsin PSC 05-CE-146 docket. Cardinal-Hickory Creek was part of MISO’s 17 project MVP Portfolio. Déjà vu all over again – MISO’s “benefit” scheme hasn’t changed.

The issues raised by the Complainants and the MISO Independent Market Monitor regarding MISO Tranche 2.1 are nothing new. It’s time the Commission and the many other Intervenor take notice.

Very truly yours,

Carol A. Overland
Attorney at Law

Enclosures: MISO Independent Market Monitor Comment, September 8, 2025, and MISO IMM Comments on LRTP Tranche 2 Benefit Metrics, May 29, 2024.