

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

Great River Energy, Minnesota Power, and Otter Tail Power Company)	Docket No. E015, ET2, E017/CN-25-109
)	
In the Matter of the Application for a Certificate of Need for the Maple River-Cuyuna 345 kV Transmission Line Project.)	
)	
)	

**MIDCONTINENT INDEPENDENT
SYSTEM OPERATOR, INC.’S COMMENTS**

I. Introduction

On January 30, 2026, Great River Energy, Minnesota Power, and Otter Tail Power Company (collectively, the “Applicants”) filed an Application for a Certificate of Need (“Application”) with the Minnesota Public Utilities Commission (“Commission”). In a Notice of Comment Period issued on February 9, 2026, the Commission provided persons interested in these proceedings an opportunity to comment upon the Application’s completeness, whether there are any contested issues of fact with respect to the representations made in the Application, whether the Application should be stayed to that it can be jointly reviewed with a subsequently filed route permit application, and any other issues or concerns related to this matter. A comment period was set for February 24, 2026 for initial comments, March 3, 2026 for reply comments, and March 10, 2026 for supplemental comments.

Midcontinent Independent System Operator, Inc. (“MISO”) submits these comments in support of an evaluation by the Commission recognizing that there are no contested issues of fact with respect to the representations made in the Application.

II. Background

The Application seeks authorization to construct, operate, and maintain the Maple River-Cuyuna 345 kilovolt (“kV”) Transmission Project (the “Project”). MISO transmission planning includes the Project as an integral part of the Long Range Transmission Planning (“LRTP”) Tranche 2.1 portfolio of twenty-four transmission projects. The Project includes construction of a new 345 kV double-circuit transmission line that will connect Otter Tail Power Company’s Maple River Substation in Cass County, North Dakota to Minnesota Power’s Cuyuna Substation in Crow Wing County, Minnesota.¹ The distance traversed will be approximately 160 to 180 miles within Minnesota, with the exact distance depending on the final route selected.²

III. Comments

A. The Project Resulted from the MISO Transmission Planning Process

MISO is a not-for-profit, member-based regional transmission organization providing reliability and market services over more than 75,000 miles of transmission lines in fifteen states and one Canadian province, including throughout the State of Minnesota. MISO is responsible for the operational oversight and control, market operations, and planning of the transmission systems of its member transmission owners, including the Applicants.

MISO adheres to FERC-approved planning principles and directives, providing an open and transparent regional planning process that results in recommendations for expansion that are reported in the MISO Transmission Expansion Plan (“MTEP”). Consistent with these requirements, the objectives of the MTEP process are to identify transmission system expansions

¹ Application at 11.

² *Id.*

to ensure reliable operation of the transmission system, identify critically needed expansion to support the reliable and competitive supply of electric power, and identify transmission upgrades needed to support energy policy mandates.

MISO is the Planning Coordinator for its regional area of operations, and performs planning functions collaboratively with stakeholder input throughout, while also providing an independent assessment and perspective of the needs of the overall transmission system. MISO's planning process includes the development of necessary transmission projects that are included in the annual MTEP. MTEP24 includes the Project as an essential part of the LRTP Tranche 2.1 portfolio of twenty-four transmission projects. MISO has assessed the portions of the Application that support the need for the Project and finds them to be accurate.³

B. A Timely Review Will Facilitate the Flow of Benefits to Minnesota

The Applicants anticipate an in-service date between 2031 and 2033 for the Project.⁴ That in-service date is expected to match or be sooner than the planned in-service date contained in MISO's planning reports (June 1, 2033),⁵ so that the Applicants' proposal to wait for certificate of need review until its route proposal is submitted does not appear to present a challenge.⁶ Thereafter, once the route permit application is deemed complete, prompt review of the Application will help ensure that the Applicants can meet the earliest possible in-service date.

The planning of Tranche 2.1 followed the development of LRTP Tranche 1, which was approved by the MISO Board of Directors ("Board") as part of MTEP21. In the years since the

³ See, e.g., Application at 32-53 (describing MISO's analysis of need for the Project); see also Application, Appendix F ("MISO LRTP Tranche 2.1 Portfolio Report"), Chapter 2 ("Regional/Long Range Transmission Planning").

⁴ Application at 26, n. 19.

⁵ *Id.*

⁶ *Id.* at 9.

approval of MTEP21, the magnitude of forecasted change for the future system has only increased. Tranche 2.1 builds on the transmission improvements in Tranche 1 to ensure that the future system needs are met.

MISO's LRTP Tranche 2.1 portfolio will bring numerous benefits to the MISO Midwest Subregion,⁷ which includes Minnesota and North Dakota. The LRTP Tranche 2.1 portfolio will enable the delivery of increased levels of generation and provide for economic benefits in excess of the portfolio costs to the Midwest Subregion. Each project in LRTP Tranche 2.1 was determined to be a necessary component of the overall portfolio of projects. The Project is necessary to prevent numerous reliability issues that will occur for the projected future system if the Project is not completed.

The MISO regional planning process adheres to the FERC Order Nos. 890 and 1000 open and transparent planning principles.⁸ This process involves numerous evaluations of project proposals and their effectiveness, and provides multiple opportunities for stakeholders to review a project's need, design, and effectiveness. As a result of the multi-year planning process involved in developing the Tranche 2.1 portfolio, and in coordination with the Applicants and other stakeholders, the Project has been identified and considered to be an integral part of the overall transmission system in MISO's footprint. The Project will provide substantial reliability, economic, and public policy benefits to Minnesota and North Dakota, and contribute to continued development of a reliable and

⁷ The "Midwest Subregion" begins in Missouri and extends northward to the Canadian border and is bounded by Michigan and eastern Montana.

⁸ *Preventing Undue Discrimination and Preference in Transmission Service*, Order No. 890, FERC Stats. & Regs. ¶ 31,241, *order on reh'g*, Order No. 890-A, FERC Stats. & Regs. ¶ 31,261 (2007), *order on reh'g and clarification*, Order No. 890-B, 123 FERC ¶ 61,299 (2008), *order on reh'g*, Order No. 890-C, 126 FERC ¶ 61,228 (2009), *order on clarification*, Order No. 890-D, 129 FERC ¶ 61,126 (2009); *Transmission Planning and Cost Allocation by Transmission Owning and Operating Public Utilities*, Order No. 1000, 136 FERC ¶ 66,051 (2011), *order on reh'g*, Order No. 1000-A, 139 FERC ¶ 61,132 (2012), *order on reh'g and clarification*, Order No. 1000-B, 141 FERC ¶ 61,044 (2012).

economical regional transmission system in the Midwest Subregion. Timely consideration of the Application will facilitate the timely flow of benefits to the region.

The Applicants' Project will become an interconnected part of the high voltage transmission systems in Minnesota and North Dakota. The Project is an integral part of the Tranche 2.1 portfolio of twenty-four transmission projects that were approved by the MISO Board after a unified evaluation and stakeholder process.

Conclusion

For the reasons stated in these comments, the Application is accurate and there are no contested issues of fact with respect to the representations made in the Application. A timely process for consideration of the Application will facilitate the delivery of benefits to Minnesota, North Dakota, and the region

Dated: February 24, 2026

Respectfully submitted,

THE MIDCONTINENT INDEPENDENT SYSTEM
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CERTIFICATE OF SERVICE

A true and correct copy of the Comments by the Midcontinent Independent System Operator, Inc., on this 24th day of February, 2026, has been efiled by posting the same on eDockets in the above-referenced dockets. The Comments have also been served on the Service List on file with the Minnesota Public Utilities Commission.

/s/Kayleigh Khavari

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