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Information Request No. 3

Docket No.: E002/CN-25-117
Response To: North Route Group and NO765MN
Requestor: Carol Overland
Date Received: July 7, 2026

Question:

Regarding “Local Minnesota Drivers”

Application, p. 11, “Local Minnesota Drivers” for Tranche 2.1 provides three claims:

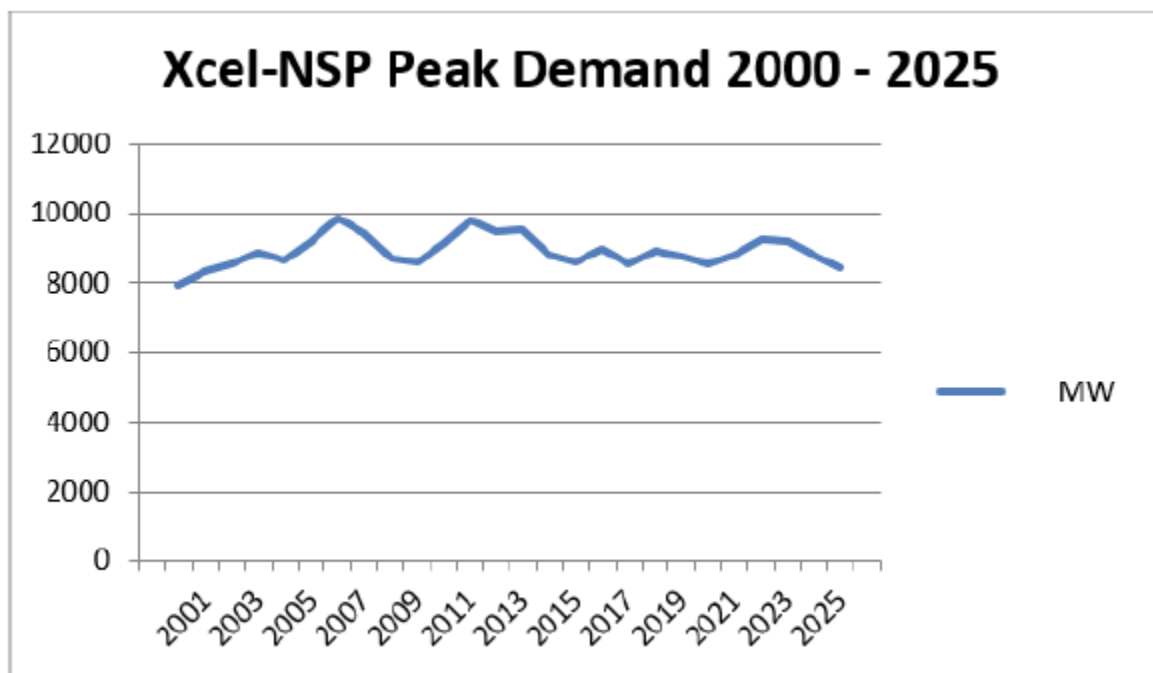
- FERC RTOs – How is creation of RTOs to plan for a multi-state regional basis a Local Minnesota Driver?
 - Objection: The Applicants object to this IR because it is vague and ambiguous.
 - Response: RTOs, including MISO, were created to operate and plan the transmission grid on a multi-state regional basis to improve reliability and cost efficiency, transforming how the transmission system is used. While prior to RTOs Minnesota was part of a power pool, the Minnesota transmission grid was primarily planned and operated on a more localized basis.
- The Next Generation Energy Act of 2007 mandated renewable generation.
 - Did the Next Generation Energy Act require closing of non-renewable generation? If so which generation (name & location) and how many MW?
 - Objection: The Applicants object to this IR because it calls for a legal conclusion and/or analysis.
 - Did the Next Generation Energy Act require siting of new generation near interconnection opportunities due to closed non-renewable generation?
 - Objection: The Applicants object to this IR because it calls for a legal conclusion and/or analysis.
 - Did the Next Generation Energy Act require permitting of renewable generation contingent on ability to interconnect?

- Objection: The Applicants object to this IR because it calls for a legal conclusion and/or analysis.
- Were renewable energy generation projects permitted prior to verification of interconnection (not in line, not studies in progress, but verified interconnection)?
 - Objection: The Applicants object to this IR because it is vague and ambiguous in terms of timing and location, and because it is overly broad and unduly burdensome in that it seeks information regarding projects not developed by the Applicants.
- Roughly what percentage of renewable energy generation projects are permitted prior to approval of interconnection?
 - Objection: The Applicants object to this IR because it is vague and ambiguous in terms of timing and location, and because it is overly broad and unduly burdensome in that it seeks information regarding projects not developed by the Applicants.
- Roughly what percentage of renewable energy generation projects are assessed costs of network upgrades?
 - Objection: The Applicants object to this IR because it is vague and ambiguous in terms of timing and location, and because it is overly broad and unduly burdensome in that it seeks information regarding projects not developed by the Applicants. The Applicants further object to this IR because it seeks information that is not relevant to this proceeding.
 - Response: All generation projects connecting to transmission under MISO's functional control have network upgrade costs assessed, based on the requested level of service, assessed through the MISO generator interconnection processes.
- The CapX 2020 forecast of 2.49% annual increase in peak demand is the third point in "Local Minnesota Drivers."
 - Did the CapX forecast of 2.49% annual increase in peak demand materialize?
 - Objection: The Applicants object to this IR because "materialize" is vague and ambiguous.
 - Response: As shown in Figure 5.3-1 and described in Section 5.3 of the Certificate of Need Application, since the late 2000s, demand growth in the Midwest has in aggregate remained relatively flat.
 - Given Xcel's relatively flat peak demand as demonstrated by SEC 10-K filings, below, and knowing that Xcel is not the only utility in Minnesota, what has Minnesota utilities' peak demand been since the 2006 peak, individually and lumped together?
 - Objection: The Applicants object to the characterizations of demand in this IR and because the IR seeks information not in the Applicants'

custody or control. The Applicants further object to this IR because it seeks information that is not relevant to this proceeding.

- Response: The Applicants do not have the peak load data for Minnesota utilities who are not Applicants in this docket. Such information may be available via third-party databases. The Application’s analysis evaluated MISO futures, rather than historical peak demand.
 - Xcel Energy’s historical peak loads are included in the referenced SEC 10-K filings.
 - ITC Midwest does not serve end load.
 - GRE's historical peak demands are included in Table IR3.1. Reported peak demand values reflect the total coincident peak demand of GRE member-owner distribution cooperatives for which GRE had a wholesale purchase obligation that year. Because the roster of GRE member-owner distribution cooperatives has changed over the past 20 years, values reflect changes in membership over time.

Table IR3.1	
GRE Annual Peak Demand	
Year	Peak Demand (MW)
2006	2,563
2007	2,504
2008	2,291
2009	2,288
2010	2,426
2011	2,550
2012	2,706
2013	2,655
2014	2,476
2015	2,524
2016	2,608
2017	2,544
2018	2,596
2019	2,546
2020	2,659
2021	2,716
2022	2,666
2023	2,659
2024	2,588
2025	2,517



- What percentage annual increase has that been for Minnesota utilities over the last 19 years?
 - Objection: The Applicants object to this IR because it seeks information not within the Applicants' custody or control. The Applicants further object to this IR because it seeks information that is not relevant to this proceeding.
 - Response: See prior response. The Applicants do not have the historical peak load data for Minnesota utilities who are not Applicants in this docket. That information may be available from third-party databases. The Application's analysis evaluated MISO futures, rather than historical peak demand.

Tranche 2.1 was preceded by Tranche 1, which had two projects related to Tranche 2.1.

- Big Stone South to Alexandria to Big Oaks Transmission Projects: Commission Docket Numbers CN/22-538, TL-23-159, and TL-23-160, beginning at Big Stone South, as does MISO Tranche 2.1 Big Stone South-Brookings County-Lakefield Jct. How many MW/MVA of transmission capacity did this line add to Minnesota's transmission capacity?
 - Response: The Applicants assume this request is for the maximum rating of the noted project. The project is a single circuit 345kV line with a maximum rating of 1,792 MVA. It should be noted, this facility is part of the overall transmission system, which is interconnected to the overall Eastern Interconnect, so it is not practicable to determine the amount of additional capacity it added to Minnesota specifically.
- Mankato to Mississippi River Project: Commission Docket Numbers CN-22-532 and TL-23-157 was routed through the North Rochester substation and then on a second circuit from North Rochester across the Mississippi to Wisconsin. How many MW/MVA of transmission capacity did this line add to Minnesota's transmission capacity?

- Response: The Applicants assume this request is for the maximum rating of the noted project. The project is a single circuit 345kV line with a maximum rating of 1,792 MVA. It should be noted, this facility is part of the overall transmission system, which is interconnected to the overall Eastern Interconnect, so it is not practicable to determine the amount of additional capacity it added to Minnesota specifically.

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