STATE OF MINNESOTA PUBLIC UTILITIES COMMISSION

Patricia Hoffman
Assistant Secretary
Office of Electricity Delivery and Energy Reliability, OE-20
U.S. Department of Energy
1000 Independence Avenue SW.
Washington, DC 20585

Dear Ms. Hoffman:

The Minnesota Public Utilities Commission appreciates the opportunity to provide information that may assist the Department of Energy as it prepares the 2012 National Electric Transmission Congestion Study. The Commission offers several information items and comments in response to your November 10, 2011 letter.

1) Pertinent studies:

The Commission relies on the stakeholder process at the Midwest Independent System Operator (MISO) that evaluates transmission congestion and needed remedies in our region. We note two current studies underway that address efforts to effectively anticipate needs in our RTO footprint:

a. MTEP 11 Top Congested Flowgate Study<https://www.midwestiso.org/Library/Repository/Meeting%20Material/Stakeholder/Planning%20Materials/20111109%20MTEP11%20Top%20Congested%20FG/20111109%20MTEP11%20Top%20Congested%20FG%20TRG%20Presentation1.pdf> from the MISO 11/9/2011 TRG (technical review group) meeting

b. MTEP 11 TCFS Update<https://www.midwestiso.org/Library/Repository/Meeting%20Material/Stakeholder/SPM/20111207%20WSPM/20111207%20WSPM%20Item%2004a%20MTEP11%20Top%20Congested%20Flowgates%20Study.pdf> from the MISO 12/7/11 West Sub-regional Planning Meeting

We further acknowledge the important role of MISO planning studies of economic investments for longer-term infrastructure needed to achieve the benefits of a robust grid, including avoidance of costly congestion.

2) Minnesota Actions since 2009:

The Minnesota Public Utilities Commission was an early advocate for working collaboratively with our neighbor states/provinces to understand the opportunities and realities of regional grid investments, for both congestion mitigation and long term needs. The Upper Midwest Transmission Development Initiative (UMTDI) was an

effective 5-state[1] effort that identified options for transmission corridors in our region that would allow the participant states to address their respective renewable energy policy goals. It was led initially by then Iowa Utilities Board Chair John Norris, and later co-chaired by Commissioner Eric Callisto, of the Wisconsin Public Service Commission and Commissioner David Boyd, of the Minnesota Commission. The results of the UMTDI plan were integrated into MISO's Regional Generator Outlet Study, which informed MISO's initial Multi Value Projects process. The collaborative framework established by UMTDI, and subsequent state approvals for the necessary project-specific state permits, are evidence that states will participate in efforts to meet both state and regional transmission planning needs.

Further, Minnesota requires that state transmission owners submit for approval biennial transmission plans that are 'rolled up' to the MISO planning process, providing additional ability to manage and respond to grid deficiencies. The current 2011 state transmission plan is under review at the Commission, and can be accessed at: http://minnelectrans.com/documents/2011_Biennial_Report/2011_Biennial_Report.pdf.

Notably, a significant series of major regional-benefits transmission projects has progressed since 2009. CAPX2020 is a consortium of all large Minnesota transmission owners, and is developing a 700-mile set of 345kV projects, mostly in Minnesota and crossing into three adjacent states. The final segment is scheduled for final permit decisions in March, and earlier approved segments are in-service.

3) Minnesota Metrics:

Analysis by MISO indicates only one critical congested flow-gate in Minnesota (i.e., Johnson Jct. – Ortonville 115kV). Mitigation remedies have been identified and expected to be in-service by the end of 2016.

4) Obstacles to removal of transmission congestion:

Continued rigorous planning through an open and effective stakeholder process is needed to manage a very complicated set of issues. The Commission commends DOE efforts to address federal permitting challenges, which can be a significant factor in the effectiveness and timeliness of state permitting processes.

If you have further interest in Commission perspectives, we welcome the opportunity to discuss these or other related matters.

Sincerely,

Burl W. Haar
Executive Secretary

[1] Iowa, Minnesota, North Dakota, South Dakota and Wisconsin.