

STATE OF NORTH DAKOTA
PUBLIC SERVICE COMMISSION

Otter Tail Power Company/Montana-Dakota
Utilities Co. 345kV Transmission Line -
Jamestown to Ellendale
Public Convenience & Necessity

Case No.
PU-24-91

TRANSCRIPT OF WORK SESSION

August 19, 2024

APPEARANCES

Commissioners Sheri Haugen-Hoffart, Randy Christmann, and
Julie Fedorchak

PUBLIC SERVICE COMMISSION:

Brian Johnson, Christopher Hanson, Adam Renfandt,
Victor Schock, John Schuh

1 COMMISSIONER CHRISTMANN: Okay. This is a work
2 session of the North Dakota Public Service Commission on
3 the Otter Tail and MDU Jamestown to Ellendale 345 kV
4 transmission line. It's August 19th, 2024. It's Case
5 No. PU-24-91.

6 I don't have any anything else before turning
7 over to the portfolio holder.

8 Commissioner Fedorchak, do you?

9 COMMISSIONER FEDORCHAK: No, I don't.

10 COMMISSIONER CHRISTMANN: Okay. It's all yours,
11 Commissioner Haugen-Hoffart.

12 COMMISSIONER HAUGEN-HOFFART: Well, thank you.

13 I guess going back to our commission meeting
14 last week, I proposed an order and we got into some
15 discussion. And so I think there's those discussion
16 items that we need to go through. And I'm just going to
17 say I'm -- I'm going to give -- just may -- my question,
18 or lay it out and Randy and Julie and staff can answer
19 this.

20 You know, looking at that Jamestown to Ellendale
21 line, we've identified there's some congestions that we
22 can -- need to get -- being an exporter, get things out.
23 So when I look at MISO and studying Tranche 1, this is
24 an area that was identified there would be benefits on
25 building this 345 kV line.

1 So my first question is, if it's been identified
2 in the Tranche 1, can we quantify those benefits for MDU
3 and Otter Tail to look at it? That's my first question.
4 Has that been -- I guess I assumed, and I shouldn't do
5 that, that that was studied so we -- can we get some
6 quantification numbers on that, the benefit of that
7 line? So that's my first question. And I guess if we
8 can get that, then that might lead to some more
9 discussion.

10 So I don't know. I'm going to look to Adam and
11 Chris or Julie to maybe give me some history there on
12 that, based on the two years that I've been on the
13 Commission in that area, that that was -- has been
14 identified. And I thought MISO maybe did a good job on
15 identifying that. And this is the one, the only project
16 in Tranche 1 that North Dakota has what I would say is
17 maybe benefit. So I'll give that to --

18 ADAM RENFANDT: So I've got a couple handouts
19 here that might help guide the conversation here.

20 COMMISSIONER HAUGEN-HOFFART: Thanks, Adam.

21 ADAM RENFANDT: I think I put this in the wrong
22 order. I got a couple -- I only have two more. I've
23 got this one here. Okay, yeah. There. I think it's in
24 that order then.

25 So we're here to kind of discuss the Jamestown

1 to Ellendale 345 kV line that was part of MISO's Tranche
2 1. I believe it was passed by the MISO board of
3 directors in June of 2022.

4 So the first page you see, it is an overview.
5 When we think of LRTP projects, we kind of have to think
6 of them more in a portfolio approach. And in this
7 particular line, it happens to have been studied and
8 paired well with not just the single line, which is the
9 Jamestown to Ellendale line, but also the Big Stone
10 South to Alexandria to Cass- -- Cassie's Crossing.

11 When it comes down to the benefits, there are
12 benefits in terms of figuring out what kind of
13 reliability benefits there are. And in this case you'll
14 see that this is from a MISO presentation that indicates
15 that the Jamestown to Ellendale line as well as in
16 combination with the Big Stone South to Cassie's
17 Crossing relieves 40 elements with excess loadings for
18 the first transmission element loss or the N-1 and some
19 of the elements with excess of loading for the second
20 transmission element.

21 When MISO first started going through their
22 analysis, they looked at several alternatives. They
23 focused a lot on six of them. They look at largely --
24 largely what kind of effect in terms of loadings it will
25 have, and it will compare to see if, okay, if it can

1 identify a mini portfolio project, if you will, that
2 relieves the most. And they also tend to look somewhat
3 at the cost of those lines, but really it's a
4 reliability analysis. And they also then perform an
5 economic analysis on it as well.

6 So kind of getting back to the question on the
7 benefits that this provides, this first page shows, for
8 Zone 1 through 7, as we are in -- we are located in Zone
9 1, so that would be to the yellow, to the right of that
10 chart.

11 Now this is the most conservative, what you call
12 cost-benefit analysis. So the entire portfolio was --
13 cost \$10.3 billion. And then they figure out, okay,
14 well, what kind of benefits can we attach to it such
15 that the benefit-cost ratio is 1.0 or greater. So per
16 the tariff, that's the hurdle that we're looking at.

17 And what do I mean by "the most conservative
18 one" is that they also show this for a 40-year present
19 value for benefits as well as they increase the value of
20 loss load that they give their other metrics to
21 something that is probably a bit unrealistic.

22 So I think when people talk about and when you
23 hear numbers reported, they're mainly talking -- they're
24 talking about these numbers, which is the most
25 conservative of them.

1 So you can see that we're in Zone 1. So the
2 minimum is 2.8. And then that's where the max comes in.
3 So we've always tended -- tend to focus on the minimum
4 benefits that we can achieve.

5 And if we then go and look at the second page --

6 COMMISSIONER FEDORCHAK: And just to clarify,
7 this is for the whole -- the whole portfolio, not just
8 this line?

9 ADAM RENFANDT: Right. Yeah.

10 COMMISSIONER FEDORCHAK: Not just the two lines,
11 it's the whole --

12 ADAM RENFANDT: Yeah.

13 COMMISSIONER FEDORCHAK: -- all of Tranche 1?

14 ADAM RENFANDT: And we have asked before to --
15 for them to break it down further and more granularly.
16 Yeah, that's maybe something that we're working on, but
17 these benefit metrics and BC cost ratios are for the
18 entire \$10.3 billion. Because they're all supposed to
19 work together in one portfolio to deliver value.

20 So if we take a look at the --

21 COMMISSIONER FEDORCHAK: One more quick question
22 on that one, Adam. The inset over there on the right,
23 is that North Dakota resource additions by 2039?

24 ADAM RENFANDT: Yes, they are.

25 COMMISSIONER FEDORCHAK: So can you talk about

1 this -- assumptions that drove that?

2 ADAM RENFANDT: Okay. So the assumptions that
3 drive that is that starting off in the future's process
4 when we first start taking a look at where to place
5 these lines, we have to take a look at, okay, we have to
6 meet certain IRPs, right? We have to meet our IRP
7 goals.

8 COMMISSIONER FEDORCHAK: And "we" meaning MISO?
9 MISO.

10 ADAM RENFANDT: MISO. MISO.

11 COMMISSIONER FEDORCHAK: Not we.

12 ADAM RENFANDT: Yeah, yeah, we. Yes.

13 COMMISSIONER FEDORCHAK: MISO says?

14 ADAM RENFANDT: Yeah.

15 COMMISSIONER FEDORCHAK: Yeah.

16 ADAM RENFANDT: So MISO will collect every
17 utilities' IRPs and they'll take that and say, okay, we
18 need to -- you know, we need to achieve that.

19 And then they also will meet a certain amount of
20 goals that are not -- that aren't just goals. They're
21 just -- you know, kind of wishes, if you will, that
22 aren't -- that aren't mandated by the legislature, for
23 instance.

24 COMMISSIONER HAUGEN-HOFFART: So give me an
25 example of a goal that we might bring forward.

1 ADAM RENFANDT: If it was --

2 COMMISSIONER FEDORCHAK: That's the -- not us
3 really. We don't have these.

4 ADAM RENFANDT: Yeah.

5 COMMISSIONER FEDORCHAK: It's other states that
6 have their goals and they'll do a certain percentage of
7 them.

8 ADAM RENFANDT: Yep. Right.

9 COMMISSIONER CHRISTMANN: We have a goal but
10 it's long been exceeded --

11 COMMISSIONER FEDORCHAK: Well, these are more
12 like state -- the IRPs are what the companies are
13 planning, right? So they assume that's going to happen,
14 because the companies are planning for those at least.
15 They work to build a system that is going to meet the
16 needs of their members, which are the investor -- the
17 people with the IRPs.

18 ADAM RENFANDT: Uh-huh.

19 COMMISSIONER FEDORCHAK: And then they'll meet
20 the -- then they'll build a system to reach a certain
21 percentage of, say, Minnesota's renewable mandates or
22 Wisconsin's or whatever. That -- that's the other --

23 ADAM RENFANDT: Yep, right.

24 COMMISSIONER FEDORCHAK: -- piece component.

25 ADAM RENFANDT: Yeah. And in this component --

1 COMMISSIONER FEDORCHAK: Of the futures.

2 ADAM RENFANDT: Of the futures.

3 COMMISSIONER FEDORCHAK: These are the
4 futures --

5 ADAM RENFANDT: Yeah, yeah. And that's
6 another --

7 COMMISSIONER FEDORCHAK: -- that help to
8 (indiscernible) how -- and they're not like, you know,
9 meeting like a hundred percent of any future. They're
10 just used as the guidelines to begin to imagine what
11 kind of system we're going to need. Because nobody
12 really knows, but these are the things that direct and
13 guide what this future system they think is going to
14 need based on what people are putting in their plans.

15 ADAM RENFANDT: And that's an important point
16 because we're looking at the year 2039. And by 2039, in
17 this particular case of what -- what all of this benefit
18 metrics is based upon is that you meet 100 percent of
19 your IRP goals -- or not we, but MISO will say we're
20 going to meet a hundred percent of our IRP goals and
21 we're going to meet 85 percent of our aspirational goals
22 that -- that they -- that Commissioner Fedorchak was
23 just describing.

24 COMMISSIONER FEDORCHAK: And I do think it's
25 important to re-emphasize that MISO is trying to build a

1 system that enables the meeting of those. They aren't
2 meeting them. They're building a system that allows
3 their members to meet their IRP goals and, like Adam
4 said, 85 percent of the state mandates as a planning --
5 that's how they plan. It's their planning protocol.

6 So back to this resource additions, this is
7 based on what they're seeing in North Dakota IRPs
8 mostly?

9 ADAM RENFANDT: IRPs. They will put in some
10 units that are model built --

11 COMMISSIONER FEDORCHAK: For reliability? To
12 meet reliability standards?

13 ADAM RENFANDT: For -- yeah, for -- yeah, for
14 reliability standards as well as engineering kind of
15 judgment, I guess, if you will.

16 You know, you'll notice that there's -- you
17 know, on this case, you know, there's actually a
18 combined cycle gas being built. You know, that was --
19 you know, that's likely the -- the conversion of maybe
20 the goal --

21 COMMISSIONER FEDORCHAK: Oh. Oh. They're
22 looking at converting that to --

23 ADAM RENFANDT: Yeah.

24 COMMISSIONER FEDORCHAK: -- in their
25 assumptions?

1 ADAM RENFANDT: Yeah. We -- yeah, in their
2 assumptions so...

3 COMMISSIONER FEDORCHAK: Do they take into
4 consideration the EPA regulations?

5 ADAM RENFANDT: They haven't.

6 COMMISSIONER FEDORCHAK: I don't think so.

7 ADAM RENFANDT: No, no. No, they haven't.

8 COMMISSIONER FEDORCHAK: All right.

9 ADAM RENFANDT: So then kind of moving onto the
10 next page, so these are the benefits that they've
11 identified. The first benefit is --

12 COMMISSIONER FEDORCHAK: Let's talk for a minute
13 about how these get developed.

14 ADAM RENFANDT: Okay.

15 COMMISSIONER FEDORCHAK: Because each one of
16 these processes is like a big, long, you know,
17 stakeholder input on identifying what benefits are going
18 to be used to measure the overall -- the overall benefit
19 calculation. And these are where you get some questions
20 from the (indiscernible). The last -- I -- he's -- he's
21 pretty squishy on some of these benefit metrics, but
22 even more so on Tranche 2.

23 So, anyway, was there anything in particular
24 about these benefit metrics that raised concern in the
25 stakeholder process, Adam?

1 I mean, I know we -- we said that -- we objected
2 to the decarbonization benefit being used. And so then,
3 in response to that, they took that out and told us what
4 our cost-benefit would be without it. And it was still
5 higher than the one threshold. Significantly higher.

6 ADAM RENFANDT: Yeah. And it -- there's very
7 little benefit that's derived from this decarbonization
8 benefit. The BC, the benefit-cost ratio, goes -- when
9 you remove it, goes from 2.8 to 2.6. So that's kind of
10 saying if you spend, like, a dollar, you get \$2.06 back.

11 COMMISSIONER CHRISTMANN: So the two
12 overwhelmingly large factors in the -- in the benefit
13 column for Zone 1 are, one, congestion and fuel savings,
14 two, avoided capital cost of local resource investment;
15 correct?

16 ADAM RENFANDT: Correct. Yep.

17 COMMISSIONER CHRISTMANN: Okay. For this
18 project, not Tranche 1 but this project, and for North
19 Dakota, not MISO, what are the avoided capital costs of
20 local resource investment that this -- what costs does
21 this avoid?

22 ADAM RENFANDT: So this avoids the building of
23 local generation that would cost more.

24 COMMISSIONER CHRISTMANN: Like the gas plant
25 that we ordered Xcel to build, for example? That's the

1 only one I can think of.

2 COMMISSIONER FEDORCHAK: Again, it's modeled.

3 It's not necessary --

4 ADAM RENFANDT: Yeah. It's kind -- yeah, it's
5 kind of like, you know, when we had the original MVP
6 portfolio, we had to -- we could share resources and
7 then reduce local overbuild.

8 So if we're able to spread that out with
9 transmission, then there's a point in which you're
10 supposed to hit the sweet spot, and it's called the
11 "bathtub curve," right, in which you want to put your
12 transmission overlay on your resources such that you're
13 all in a sharing pool and you're able to then not build
14 something -- not have a grid that's Balkanized such that
15 -- or have no wires and we've got to overbuild a ton of
16 maybe thermal generation because we couldn't then use a
17 renewable source maybe.

18 COMMISSIONER CHRISTMANN: So the biggest share
19 of our benefits are avoiding costs that we can't
20 identify.

21 COMMISSIONER FEDORCHAK: Well, that's not --
22 their model costs out to 2039. I mean, you have to look
23 at the time frame. So -- and that -- these might be
24 good questions for -- because MISO should be able to
25 identify those things for this project, for that -- for

1 actually this line or those two lines. So that's
2 probably a question we could ask them for -- to address.
3 And I think it's an important one to understand, you
4 know, how all this stuff is pulled together.

5 COMMISSIONER CHRISTMANN: The other one that is
6 very significant in that is the congestion and fuel
7 savings. And so I think any of us that have, in recent
8 years, watched LMP prices have seen the congestion
9 that's over in that area; correct?

10 ADAM RENFANDT: Yep.

11 COMMISSIONER CHRISTMANN: And this study was
12 approved in 2022 so it was done well before Applied
13 Digital was even discussed. Because the -- my own just
14 occasional but pretty frequent viewing of LMP prices,
15 I've seen the heat map. I'm seeing a lot less
16 congestion problems over there. And we've only got the
17 first phase of Applied Digital going. So I don't know
18 that these congestion benefits are really there for us
19 anymore.

20 COMMISSIONER FEDORCHAK: They might not be.
21 It's a fair question. And, also, Adam's not defending
22 MISO.

23 COMMISSIONER CHRISTMANN: I know.

24 (Laughter)

25 COMMISSIONER FEDORCHAK: Adam is not MISO so...

1 COMMISSIONER CHRISTMANN: Well, he's kind of
2 bringing their case.

3 COMMISSIONER FEDORCHAK: He's been trying so
4 that we can, yeah, understand.

5 COMMISSIONER HAUGEN-HOFFART: And I guess that
6 was my question in looking at some of this, is how much
7 of this, I mean, gets updated as things go on? Like
8 Randy brought up Applied Digital. I mean, how is that
9 fed into MISO and updated so we have current -- more
10 current information? I mean --

11 COMMISSIONER FEDORCHAK: Once these projects are
12 approved, they don't go back and update all this. Like
13 this was agreed on and approved by the board a year --
14 more than a year ago. So they don't go back --

15 COMMISSIONER HAUGEN-HOFFART: Okay.

16 COMMISSIONER FEDORCHAK: -- and keep changing
17 these.

18 COMMISSIONER HAUGEN-HOFFART: Okay.

19 COMMISSIONER FEDORCHAK: -- and re-justifying
20 the case or changing the case.

21 COMMISSIONER HAUGEN-HOFFART: Well, I wouldn't
22 have to say "re-justify" but just more accurate data
23 that we as PUCs could have. Like when we -- when the --
24 when the Tranche 1, when this case comes before us, we
25 have more information, but lesson learned.

1 COMMISSIONER FEDORCHAK: And we don't ever see
2 all of Tranche 1.

3 COMMISSIONER HAUGEN-HOFFART: Right.

4 COMMISSIONER FEDORCHAK: This is the only line
5 we'll see.

6 COMMISSIONER HAUGEN-HOFFART: Right. But things
7 have changed since then. I mean -- point taken.

8 COMMISSIONER FEDORCHAK: Yeah. We should -- we
9 could ask MISO for them to provide us that for this -- I
10 don't know if they've got it at that granular level or
11 not.

12 ADAM RENFANDT: To provide?

13 COMMISSIONER FEDORCHAK: The congestion fuel
14 savings, avoided capital costs of local investment --
15 well, even all the benefit metrics, if they can, for --
16 for Zone 1 for just --

17 ADAM RENFANDT: Just --

18 COMMISSIONER FEDORCHAK: -- Jamestown to
19 Ellendale.

20 ADAM RENFANDT: Yeah, okay.

21 COMMISSIONER HAUGEN-HOFFART: Or could MDU? I'm
22 sorry, but could MDU provide us any of that?

23 COMMISSIONER FEDORCHAK: I doubt it. They don't
24 run the models.

25 ADAM RENFANDT: Yeah, they wouldn't have access

1 to that level of information and detail that MISO --

2 COMMISSIONER HAUGEN-HOFFART: I got my answer.

3 COMMISSIONER FEDORCHAK: And the thing is, the
4 other thing to remember, and this is just a part of the
5 reality of MISO, is if you look at the size of our zone,
6 I mean there's a lot of what's happening in Minnesota
7 and part of Wisconsin driving Zone 1. And that's --
8 that's the reality for us in North Dakota and MISO.
9 Zone 1 includes all of Minnesota and a chunk of
10 Wisconsin.

11 VICTOR SCHOCK: So -- especially on the fuel
12 cost savings, it's one -- because both RTOs do that kind
13 of comparison when they run modeling. And it's one
14 thing I've really struggled with in our zone. Usually
15 we have trapped generation that can't get out. And when
16 they do their model, well, this zone or this area is
17 going to benefit by that trap generation getting out.
18 Well, I suppose the zone as a whole is going to benefit,
19 but our prices go up as a result of it.

20 COMMISSIONER FEDORCHAK: Right.

21 VICTOR SCHOCK: So that negative -- that
22 negative congestion that's happening down there changes
23 to even keel with the rest of the system. And primarily
24 in this instance, I think Minnesota's prices probably go
25 down a slight bit --

1 COMMISSIONER FEDORCHAK: Yep.

2 VICTOR SCHOCK: -- while ours go up to what the
3 rest of the zone is seeing.

4 COMMISSIONER CHRISTMANN: And this is kind of
5 one of my concerns here, is so our ratepayers pay to
6 build this and the benefits are looked at, well, is this
7 investment here some big benefit, but it's mostly to
8 whoever the new developer is that comes in and builds
9 another wind farm. A few landowners but not to most of
10 these Otter Tail and MDU customers. And I'm just -- I'm
11 not seeing nearly the benefits or congestion
12 improvements as what this seems to want to indicate.

13 COMMISSIONER FEDORCHAK: Well, the other issue
14 that I think is -- two other issues that are relevant
15 are the reliability savings or reliability impacts and
16 are the access for our broader generation to get out. I
17 mean, if there's congestion, there's generators in North
18 Dakota that are being curtailed. And depending on
19 price, you know, that hurts them. And, you know, the
20 higher-price ones are the ones probably being curtailed
21 first. So that's -- that's another North Dakota issue.

22 COMMISSIONER CHRISTMANN: You know, I guess it's
23 a separate argument of whether this is the right time to
24 have the battle, but therein lies a lot of the reason
25 for me wanting to take on the battle, and I don't even

1 know how the -- where or how the battle would occur,
2 but, okay, if the issue is somebody else out of state's
3 need for energy and some developer that wants to come in
4 and set up some more wind farms here, fine, pay for it.
5 Not our ratepayers all the time.

6 And so, yes, the RTO forces this cost allocation
7 on us, but if we don't fight for it -- or fight against
8 it successfully, guess what? We're going to be paying
9 for -- was it three that's all south so maybe not that
10 -- maybe not one of them, but we're going to be paying
11 for all the rest of them too. And when better than now
12 to fight it?

13 COMMISSIONER FEDORCHAK: I don't disagree. And
14 we did fight it. But we --

15 COMMISSIONER CHRISTMANN: MISO.

16 COMMISSIONER FEDORCHAK: At MISO, yeah.

17 COMMISSIONER CHRISTMANN: I'm talking about at
18 FERC.

19 COMMISSIONER HAUGEN-HOFFART: So is that how it
20 would play out, I mean, going off of that? Tell me --

21 COMMISSIONER FEDORCHAK: Yeah, I don't know.

22 COMMISSIONER HAUGEN-HOFFART: Can you walk me --
23 well, first of all, does anybody have anything else,
24 Chris or Adam, to add to these?

25 CHRIS HANSON: Just a scale -- sorry. I was

1 just going to add that the scale of Tranche 1, the
2 numbers that we got from MDU and from Otter Tail were
3 like 10 and a half billion or somewhere between 10 and
4 10 and a half billion, and the cost per megawatt-hour
5 that they were estimating in 2031, which was the max
6 rate, was about \$2.54 per megawatt. So -- so -- or
7 megawatt-hour. So just as kind of a -- as a scale.

8 Now that -- how that impacts, say, residential
9 customers is going to depend upon the company. Because
10 each of the companies has their own allocation
11 methodology for transmission costs. But just to kind of
12 give you an average on things, the Tranche 1, on
13 average, would be about, you know, \$2.54 per
14 megawatt-hour.

15 So I'll throw -- NSP, as an example, does a
16 direct allocation per megawatt-hour so that would affect
17 their customers by \$2.54 per month for a thousand
18 kilowatts or 1 megawatt of use -- or megawatt-hour of
19 usage per month.

20 But then we talked about Tranche 2, 3, 4. You
21 know, as you're getting up into that 50 billion range,
22 then, you know, you're talking 10, \$15 per megawatt-hour
23 as a relative scale.

24 COMMISSIONER CHRISTMANN: Okay. Then I need to
25 be corrected here and find out where I'm wrong. When we

1 had our --

2 COMMISSIONER HAUGEN-HOFFART: Informal?

3 COMMISSIONER CHRISTMANN: -- informal on

4 July 8th, I didn't write down \$2.54 a month. I wrote
5 \$3.15 a month for --

6 CHRIS HANSON: Yep.

7 COMMISSIONER CHRISTMANN: -- MDU and 5.85 for --

8 CHRIS HANSON: Correct.

9 COMMISSIONER CHRISTMANN: -- Otter Tail.

10 CHRIS HANSON: Correct. So as I said, MDU and
11 Otter Tail have an allocation methodology that's
12 different for residential and for commercial,
13 industrial. I'll use NSP as an example because they do
14 a per-megawatt-hour allocation so it's a straight --

15 COMMISSIONER CHRISTMANN: Oh.

16 CHRIS HANSON: It's a different methodology but
17 it's -- it's, I guess you could say, cleaner. But the
18 average that MISO was allocating, their number was \$2.54
19 based upon their estimates at the peak in 2031 when all
20 the projects are up and running before they start to
21 amortize off.

22 So, yes, you are correct. Like MDU's number,
23 MDU's number was \$3.15. The memo that I had was 5.75.
24 And I think Matt Olsen came back and amended that to
25 5.85 per megawatt-hour. So that's because they used

1 different methodology for allocating those transmission
2 costs. So you are correct.

3 COMMISSIONER FEDORCHAK: Okay. So I -- and
4 Randy raised a good question about how, if we deny this,
5 say, what is the result? Where does it go? Or do the
6 companies -- where can the companies protest? Or MISO,
7 I guess.

8 UNIDENTIFIED SPEAKER: Well, I'm still getting
9 acquainted with this case. And I know you guys asked me
10 to come in here and have some discussion, but if we have
11 -- we issue an order with the denial, obviously it
12 depends on the basis of the denial and it depends on the
13 basis of the challenge. It could either be in Federal
14 District Court or it could be in State Court. And so it
15 would be up to the issue that really is being appealed.

16 COMMISSIONER FEDORCHAK: So the -- Otter Tail or
17 MDU would likely then decide to take it -- it could.

18 UNIDENTIFIED SPEAKER: It would likely be Otter
19 Tail or MDU.

20 COMMISSIONER CHRISTMANN: Or MISO.

21 COMMISSIONER FEDORCHAK: Could MISO? Do they
22 have any --

23 UNIDENTIFIED SPEAKER: Again, depending on the
24 issue and where it's at.

25 COMMISSIONER CHRISTMANN: Well, let's say --

1 COMMISSIONER FEDORCHAK: Sure.

2 COMMISSIONER CHRISTMANN: I mean if -- if it
3 went to court and the courts backed the Commission on a
4 denial -- or, no, overturned the Commission on a denial,
5 well, then it would move forward unless we appealed.
6 But let's say they backed our decision on a denial,
7 wouldn't at some point this get to be a FERC thing over
8 whether the states can stop -- and this could be SPP
9 too -- stop RTO-approved projects through their PC&N
10 process? Isn't that something that is going to have to
11 get determined at some point? Or are they just all
12 going to go to load pays?

13 UNIDENTIFIED SPEAKER: So I'm guessing the issue
14 that you're presenting is an interstate commerce issue
15 from the discussion that you're providing. And I'd be
16 happy to have some additional discussion with that, but
17 I probably would not want to be having that in -- in
18 open meeting without having an opportunity to review the
19 tariffs that we're discussing.

20 COMMISSIONER CHRISTMANN: So we've kind of
21 touched on these, but I want to re-emphasize two points.
22 One is, yes, we can talk about avoiding congestion or
23 avoiding additional investment costs. I haven't found
24 any basis for those other than someone who likes doing
25 projects, putting numbers together, I -- I can't see

1 anything.

2 I will point out, though, that among the project
3 benefits are to accommodate new electric generation
4 projects. That, to me, that's who ought to be paying at
5 least a good part of this, if not all of it. Because
6 that, to me, is the key benefit in this, is to add the
7 new generators. And to the extent that's for
8 decarbonization or to meet other states' policy goals,
9 regardless. The point is to add that generation. And I
10 think that is the key benefit that this is looking to
11 solve.

12 The other, though, has to do with reliability
13 and our discussion. This isn't in, like, the
14 presentation, I don't think, but I'm using my
15 recollection. Correct me if it's wrong. The real
16 reliability issue in North Dakota that was highlighted
17 as an example that this could take care of was the very
18 near miss at Jamestown.

19 And I think it's been said before, but kudos
20 again to Otter Tail for still hanging on to that old
21 generator in town there that almost never gets used and
22 being able to keep Jamestown going as they did.

23 But as this plays out in my mind, this project,
24 what I have heard was, if I were to add all the new
25 generation, it generally flows from that -- like the

1 Ellendale point down through South Dakota and Minnesota
2 and out, but if there's problems there, they need this
3 alternative route to get it up to Jamestown and then
4 from there on it can flow through Fargo and away.

5 Okay. If -- as far as to add the new
6 generation, I guess that makes sense. It also tells me
7 there's plenty of capacity in the transmission lines
8 between Jamestown and Fargo for all this to flow that
9 way, which tells me when Xcel builds their gas plant
10 there, it can flow the other way and that can just as
11 easily be used to help solve any potential energy
12 shortfalls in Jamestown.

13 And so I think the one investment that I can see
14 that this is going to eliminate the need for is that
15 generation plant. And I guess it's fine as long as
16 we're willing to have service when it's windy but not
17 when it's not. I don't think most of the people are.

18 COMMISSIONER FEDORCHAK: Randy, did you review
19 the project benefits identified in the companies'
20 application?

21 COMMISSIONER CHRISTMANN: I have, but it's been
22 a while and I don't know if I have --

23 COMMISSIONER FEDORCHAK: How did we -- we had an
24 informal, right --

25 COMMISSIONER HAUGEN-HOFFART: Yeah.

1 COMMISSIONER FEDORCHAK: -- on this? That's how
2 we --

3 COMMISSIONER CHRISTMANN: Was that presented
4 then or was that in the case earlier?

5 COMMISSIONER HAUGEN-HOFFART: Well, it's --
6 both.

7 COMMISSIONER FEDORCHAK: Both.

8 COMMISSIONER HAUGEN-HOFFART: It's in their
9 application and the --

10 COMMISSIONER CHRISTMANN: What you're looking
11 at, though --

12 COMMISSIONER FEDORCHAK: This is their
13 application.

14 COMMISSIONER CHRISTMANN: -- this.

15 COMMISSIONER FEDORCHAK: Right.

16 COMMISSIONER CHRISTMANN: Okay.

17 COMMISSIONER FEDORCHAK: This is the
18 application.

19 COMMISSIONER CHRISTMANN: What page?

20 COMMISSIONER FEDORCHAK: 11. And to some extent
21 page 9 is the project need.

22 COMMISSIONER CHRISTMANN: Okay.

23 COMMISSIONER FEDORCHAK: I just don't know when
24 they -- when all these problems, these reliability
25 problems, like at 40 transmission elements with

1 excessive thermal loadings for N-1 contingencies and 70
2 elements with excessive loading, and then down below the
3 project improves voltages in the Red River Valley by
4 relieving 97 voltage violations and 91 voltage
5 violations for N-1-1 contingencies, like how many of
6 those are North Dakota customers? How much of that is
7 -- how much of that is a North Dakota issue?

8 I mean, I am -- I want to know -- I would have
9 to be reminded of that. I'd have to have a more
10 technical discussion, I think, with the company to
11 understand the implications for our customers of not
12 having this line.

13 VICTOR SCHOCK: Isn't N-1 what drives congestion
14 pricing?

15 COMMISSIONER FEDORCHAK: I don't --
16 Adam?

17 ADAM RENFANDT: If it's overloaded, so if it's
18 overloaded, it could be overloaded for a number of
19 reasons. You know, an outage definitely is it. I mean,
20 that creates congestion such that, if you can't -- if
21 you can't have -- if you can't fire up or move electrons
22 from point A to point B and then you might have to go
23 and fire up a more expensive peaker, for instance, if
24 you've got a line outage, for instance.

25 VICTOR SCHOCK: Right.

1 ADAM RENFANDT: Or something like that, yeah.

2 VICTOR SCHOCK: But congestion pricing -- and
3 this is, I think, the case in both RTOs. It isn't
4 because the lines that are in operation at that moment
5 can't handle the load that's going across them. It's in
6 the event of a loss of your biggest element --

7 ADAM RENFANDT: Uh-huh.

8 VICTOR SCHOCK: -- the remaining system isn't
9 able to pick that load up without tripping.

10 ADAM RENFANDT: It doesn't have to be -- like
11 you can get congestion if it just -- if it -- in the
12 event that it would -- if in the event that you had an
13 outage.

14 VICTOR SCHOCK: Right.

15 ADAM RENFANDT: In that case, yeah, then --
16 yeah, then you -- but you're not actually in an outage.

17 VICTOR SCHOCK: Right. No, I absolutely agree
18 that you're not in an outage, but the pricing for
19 congestion, I think, is based on that N-1 scenario.

20 ADAM RENFANDT: Yeah, that's how the grid
21 operates. Yeah. Yep.

22 VICTOR SCHOCK: So all that is to say I think
23 that's a good portion of what they're speaking to in the
24 40 elements with excessive loading for the first
25 transmission element loss.

1 ADAM RENFANDT: Yeah, yeah, that's --

2 VICTOR SCHOCK: I think that's largely
3 congestion.

4 I don't know if that -- does that make some
5 sense?

6 COMMISSIONER FEDORCHAK: And so?

7 VICTOR SCHOCK: I'm not drawing any conclusions
8 from that. It was just that you started to kind of talk
9 about it a little bit and I -- I don't know that that's
10 the entire answer --

11 COMMISSIONER FEDORCHAK: So the benefits of
12 relieving that are -- it's not a reliability concern.

13 VICTOR SCHOCK: Not -- I'm not even saying that
14 definitively. I think your question was what those 40
15 elements are. And I think probably a good chunk of them
16 are probably that N-1 scenario where overloading --

17 COMMISSIONER FEDORCHAK: Well, no. I'll put it
18 a lot more simply.

19 VICTOR SCHOCK: Okay.

20 COMMISSIONER FEDORCHAK: That's a lot of
21 technical mumbo jumbo. What I want to know is how does
22 this matter to North Dakota customers?

23 VICTOR SCHOCK: Sure.

24 COMMISSIONER FEDORCHAK: Does it? Or is it just
25 a bunch of sentences to make it seem like, "Jeez, that

1 sounds bad, we better approve this"? Right?

2 VICTOR SCHOCK: Yeah.

3 COMMISSIONER FEDORCHAK: So I don't know.

4 Maybe --

5 VICTOR SCHOCK: Sure.

6 COMMISSIONER FEDORCHAK: -- it is a bunch --
7 maybe it is a big problem for North Dakota customers,
8 maybe it isn't. I don't -- I can't tell by this, and I
9 don't recall exploring that deeply in our informal with
10 them. So I would want to know that so we don't -- you
11 know, so I can have that information --

12 VICTOR SCHOCK: Yep.

13 COMMISSIONER FEDORCHAK: -- in making my
14 decision anyway.

15 VICTOR SCHOCK: Do you want to know that from
16 the company or from MISO?

17 COMMISSIONER HAUGEN-HOFFART: The company.

18 COMMISSIONER FEDORCHAK: The company.

19 COMMISSIONER HAUGEN-HOFFART: It's in their
20 application.

21 UNIDENTIFIED SPEAKER: So just for clarification
22 on that, they're basically saying when they analyze this
23 solution, they're kind of looking at it in conjunction
24 with the Big Stone, Alexandria, the other projects on
25 Zone 1. So you're saying, "Okay, well, I get that this

1 applied to all of Zone 1, but of that -- of these
2 issues, how many -- how much of the issue applied to
3 North Dakota specifically?" So we're kind of getting
4 lumped in with the whole zone.

5 COMMISSIONER FEDORCHAK: Right.

6 UNIDENTIFIED SPEAKER: And this is the issue to
7 the whole zone, but how much of it applies specifically
8 to us?

9 COMMISSIONER FEDORCHAK: Yeah. And what is the
10 impact of this? Is it a price issue? Is it -- is it a
11 lot -- you know, we can't get power at certain times?
12 It's hurting the lines? Like what is the actual -- what
13 are the issues that it's causing?

14 Yeah, and same -- I mean, the company might have
15 a -- probably MISO needs to get us more specifics of the
16 impacts of this project on the benefit metrics that
17 they've used here. And if they can get those for North
18 Dakota versus all of Zone 1, that would be helpful too.

19 COMMISSIONER CHRISTMANN: You know, when -- when
20 it's simplified down, when -- and I don't know who was
21 speaking at the time, I presume Otter Tail because it
22 was about Jamestown, but between the two when we had the
23 informal, when they talked about that situation in
24 Jamestown that I referenced earlier, okay, yeah, that is
25 something that happened, aware of it, it made a good

1 case in point to me, I was thinking, okay, now I'm
2 seeing some benefit here until, like I say, then I
3 thought more about it, except for, supposedly, within a
4 little over a year or -- things usually run late, but in
5 the relatively near term we had a new gas plant go in
6 Fargo. That should be able to do it. I guess when they
7 just say, "Oh, well, there's all these benefits," it's
8 not very persuasive to me.

9 COMMISSIONER FEDORCHAK: Uh-huh.

10 COMMISSIONER CHRISTMANN: Tell me what they are,
11 where the shortages are, what can't we do. And we'll
12 see once -- whether it seems it to me that -- or it
13 seems to us as a group, as a body, whether those
14 benefits then are primarily going to the ratepayers that
15 are being asked to pay for this or to somebody else.

16 COMMISSIONER FEDORCHAK: Yep. Good questions.
17 As you said, like, we tried in the cost allocation
18 discussion to make these points. They weren't -- they
19 didn't win the day. This is our next -- this is our
20 next tool to try to address them.

21 COMMISSIONER CHRISTMANN: And while we're on
22 this, I -- a legal question -- oh, did you have
23 something else?

24 COMMISSIONER FEDORCHAK: Well, I just -- but I'm
25 not -- I'm also -- you know, I definitely -- I'm not

1 sure that this doesn't have just merits for North Dakota
2 on -- on a technical side so I'm not, like -- I'm very
3 open to hearing what the benefits are to our customers
4 because I -- I think that there are -- and to our
5 generators, I guess. I'd like to evaluate -- be
6 evaluating that along with it. So...

7 COMMISSIONER CHRISTMANN: I think you got it
8 covered.

9 VICTOR SCHOCK: So to clarify -- clarify what I
10 think I heard, so we're going to get a response from
11 MISO on the benefit metrics for Zone 1 on this line
12 specifically. So I think if Adam can reach out, that's
13 probably the most efficient.

14 And then whatever response you get, if you want
15 to pass that through Chris.

16 And then, Chris, if you can work with Otter Tail
17 and MDU on a response for what these elements savings
18 and benefits are. And then, you know, if it's
19 reliability benefit, how and what circumstance?

20 And we'll get all of that submitted into a
21 couple of docket entries, hopefully, rather than just
22 some emails flying around. And --

23 COMMISSIONER CHRISTMANN: And, you know, yes, I
24 know these things take time, but there's a reason why
25 they take time, so people don't make bad decisions. But

1 it seems like as far as the -- anything having to do
2 with congestion in that area of the state, this should
3 be recalculated based on Applied Digital's second phase
4 being in effect. Because I understand they're pretty
5 far along with it already and the first phase is already
6 going. And, like I say, from my just viewing of heat
7 maps, it's having quite an impact. So maybe I'm wrong
8 about that, but it doesn't appear that way to me.

9 COMMISSIONER HAUGEN-HOFFART: But it's a good
10 point to evaluate.

11 COMMISSIONER FEDORCHAK: Yeah. And then maybe
12 they can provide information about what other additional
13 generation they've cited there in their long-range
14 transmission planning that drove the need for these
15 lines. Because it isn't just what exists today. It's
16 much more what they modeled to becoming. So, you know,
17 that -- that is part of this equation so they should
18 explain that.

19 UNIDENTIFIED SPEAKER: The generation that --
20 that showed up?

21 COMMISSIONER FEDORCHAK: Where they -- yeah.
22 That's going to -- you know, it isn't just --

23 COMMISSIONER HAUGEN-HOFFART: Planning.

24 COMMISSIONER FEDORCHAK: -- well, we took care
25 of the congestion now because we've got Applied Digital

1 there. There's a bunch more -- how many more wind farms
2 did they model being developed in the eastern part of
3 North Dakota that will drive congestion up again? And
4 those were driven by -- probably by Minnesota
5 environmental goals and others but -- yeah.

6 UNIDENTIFIED SPEAKER: Yeah.

7 COMMISSIONER FEDORCHAK: That would be helpful
8 to know, what kind of generation they modeled in that
9 area --

10 UNIDENTIFIED SPEAKER: And where.

11 COMMISSIONER FEDORCHAK: -- for this.

12 UNIDENTIFIED SPEAKER: Yeah, we can -- we can
13 get that.

14 COMMISSIONER HAUGEN-HOFFART: And I think
15 separately, I mean we're going to work with Jack as far
16 as maybe some next steps --

17 UNIDENTIFIED SPEAKER: Sure.

18 COMMISSIONER HAUGEN-HOFFART: -- if denied just
19 for an understanding as far as litigation.

20 UNIDENTIFIED SPEAKER: Be happy to have that
21 discussion. I would note as well, though, after we
22 receive all the documents, all the information that's
23 necessary, it may be worth considering appointing
24 advocacy staff if we need to flush out certain issues a
25 little better and maybe have a formal hearing on it as

1 well.

2 COMMISSIONER FEDORCHAK: Yeah. That's a good
3 point. I'd be open to that, because I really do want to
4 understand the companies' side of it and the benefits
5 that they are seeing.

6 COMMISSIONER CHRISTMANN: Anything else?

7 COMMISSIONER HAUGEN-HOFFART: No. I think this
8 was -- first of all, I want to say thanks to everyone
9 for getting this lined up so quickly on the work
10 session. And, no, I have nothing further. I look
11 forward to the additional information to receive to
12 evaluate.

13 COMMISSIONER CHRISTMANN: Okay. With that,
14 thanks, everybody, and this work session is concluded.

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Dated this date of September 8, 2025.

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