## August 19, 2024, Work session ND PUBLIC SERVICE COMMISSION

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. STATE OF NORTH DAKOTA 4 PUBLIC SERVICE COMMISSION Has that been -- I guess I assumed, and I shouldn't do 5 that, that that was studied so we -- can we get some Otter Tail Power Company/Montana-Dakota Utilities Co. 345kV Transmission Line -Jamestown to Ellendale Public Convenience & Necessity 6 quantification numbers on that, the benefit of that 7 line? So that's my first question. And I quess if we 8 can get that, then that might lead to some more 9 10 So I don't know. I'm going to look to Adam and TRANSCRIPT OF WORK SESSION 11 Chris or Julie to maybe give me some history there on August 19, 2024 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 APPEARANCES 17 maybe benefit. So I'll give that to --Commissioners Sheri Haugen-Hoffart, Randy Christmann, and 18 ADAM RENFANDT: So I've got a couple handouts Julie Fedorchak 19 here that might help guide the conversation here. PUBLIC SERVICE COMMISSION:
Brian Johnson, Christopher Hanson, Adam Renfandt,
Victor Schock, John Schuh 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 COMMISSIONER CHRISTMANN: Okay. This is a work 1 to Ellendale 345 kV line that was part of MISO's Tranche 2 session of the North Dakota Public Service Commission on 2 1. I believe it was passed by the MISO board of directors in June of 2022. 3 the Otter Tail and MDU Jamestown to Ellendale 345 kV 3 transmission line. It's August 19th, 2024. It's Case So the first page you see, it is an overview 5 5 No. PU-24-91 When we think of LRTP projects, we kind of have to think 6 6 I don't have any anything else before turning of them more in a portfolio approach. And in this 7 7 over to the portfolio holder particular line, it happens to have been studied and 8 Commissioner Fedorchak, do you? 8 paired well with not just the single line, which is the 9 COMMISSIONER FEDORCHAK: No. I don't. 9 Jamestown to Ellendale line, but also the Big Stone 10 COMMISSIONER CHRISTMANN: Okay. It's all yours, 10 South to Alexandria to Cass- -- Cassie's Crossing 11 Commissioner Haugen-Hoffart. 11 When it comes down to the benefits, there are 12 12 COMMISSIONER HAUGEN-HOFFART: Well, thank you. benefits in terms of figuring out what kind of 13 13 I guess going back to our commission meeting reliability benefits there are. And in this case you'll 14 last week. I proposed an order and we got into some 14 see that this is from a MISO presentation that indicates 15 discussion. And so I think there's those discussion 15 that the Jamestown to Ellendale line as well as in 16 16 items that we need to go through. And I'm just going to combination with the Big Stone South to Cassie's 17 say I'm -- I'm going to give -- just may -- my question, 17 Crossing relieves 40 elements with excess loadings for 18 or lay it out and Randy and Julie and staff can answer 18 the first transmission element loss or the N-1 and some 19 19 of the elements with excess of loading for the second 20 20 You know, looking at that Jamestown to Ellendale transmission element 21 line, we've identified there's some congestions that we 21 When MISO first started going through their 22 can -- need to get -- being an exporter, get things out. 22 analysis, they looked at several alternatives. They 23 So when I look at MISO and studying Tranche 1, this is 23 focused a lot on six of them. They look at largely --24 an area that was identified there would be benefits on 24 largely what kind of effect in terms of loadings it will 25 25 building this 345 kV line have, and it will compare to see if, okay, if it can PAGE 4

1	identify a mini portfolio project, if you will, that	1	this assumptions that drove that?
2	relieves the most. And they also tend to look somewhat	2	ADAM RENFANDT: Okay. So the assumptions that
3	at the cost of those lines, but really it's a	3	drive that is that starting off in the future's process
4	reliability analysis. And they also then perform an	4	when we first start taking a look at where to place
5	economic analysis on it as well.	5	these lines, we have to take a look at, okay, we have to
6	So kind of getting back to the question on the	6	meet certain IRPs, right? We have to meet our IRP
7	benefits that this provides, this first page shows, for	7	goals.
8	Zone 1 through 7, as we are in we are located in Zone	8	COMMISSIONER FEDORCHAK: And "we" meaning MISO?
9	1, so that would be to the yellow, to the right of that	9	MISO.
10	chart.	10	ADAM RENFANDT: MISO. MISO.
11	Now this is the most conservative, what you call	11	COMMISSIONER FEDORCHAK: Not we.
12	cost-benefit analysis. So the entire portfolio was	12	ADAM RENFANDT: Yeah, yeah, we. Yes.
13	cost \$10.3 billion. And then they figure out, okay,	13	COMMISSIONER FEDORCHAK: MISO says?
14	well, what kind of benefits can we attach to it such	14	ADAM RENFANDT: Yeah.
15	that the benefit-cost ratio is 1.0 or greater. So per	15	COMMISSIONER FEDORCHAK: Yeah.
16	the tariff, that's the hurdle that we're looking at.	16	ADAM RENFANDT: So MISO will collect every
17	And what do I mean by "the most conservative	17	utilities' IRPs and they'll take that and say, okay, we
18	one" is that they also show this for a 40-year present	18	need to you know, we need to achieve that.
19	value for benefits as well as they increase the value of	19	And then they also will meet a certain amount of
20	loss load that they give their other metrics to	20	goals that are not that aren't just goals. They're
21	something that is probably a bit unrealistic.	21	just you know, kind of wishes, if you will, that
22	So I think when people talk about and when you	22	aren't that aren't mandated by the legislature, for
23	hear numbers reported, they're mainly talking they're	23	instance.
24	talking about these numbers, which is the most	24	COMMISSIONER HAUGEN-HOFFART: So give me an
25	conservative of them.	25	example of a goal that we might bring forward.
	PAGE 5		PAGE 7
1	So you can see that we're in Zone 1. So the	1	ADAM RENFANDT: If it was
2	minimum is 2.8. And then that's where the max comes in.	2	COMMISSIONER FEDORCHAK: That's the not us
3	So we've always tended tend to focus on the minimum	3	really. We don't have these.
4	benefits that we can achieve.	4	ADAM RENFANDT: Yeah.
5	And if we then go and look at the second page	5	COMMISSIONER FEDORCHAK: It's other states that
6	COMMISSIONER FEDORCHAK: And just to clarify,	6	have their goals and they'll do a certain percentage of
7	this is for the whole the whole portfolio, not just	7	them.
8	this line?	8	ADAM DENEMBEL Von Bight
9			ADAM RENFANDT: Yep. Right.
	ADAM RENFANDT: Right. Yeah.	9	COMMISSIONER CHRISTMANN: We have a goal but
10	ADAM RENFANDT: Right. Yeah.  COMMISSIONER FEDORCHAK: Not just the two lines,	9 10	
10 11	·		COMMISSIONER CHRISTMANN: We have a goal but
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11	COMMISSIONER FEDORCHAK: Not just the two lines, it's the whole	10 11	COMMISSIONER CHRISTMANN: We have a goal but it's long been exceeded COMMISSIONER FEDORCHAK: Well, these are more
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11 12 13	COMMISSIONER FEDORCHAK: Not just the two lines, it's the whole ADAM RENFANDT: Yeah. COMMISSIONER FEDORCHAK: all of Tranche 1?	10 11 12 13	COMMISSIONER CHRISTMANN: We have a goal but it's long been exceeded  COMMISSIONER FEDORCHAK: Well, these are more like state the IRPs are what the companies are planning, right? So they assume that's going to happen,
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1	COMMISSIONER FEDORCHAK: Of the futures.	1	ADAM RENFANDT: Yeah. We yeah, in their
2	ADAM RENFANDT: Of the futures.	2	assumptions so
3	COMMISSIONER FEDORCHAK: These are the	3	COMMISSIONER FEDORCHAK: Do they take into
4	futures	4	consideration the EPA regulations?
5	ADAM RENFANDT: Yeah, yeah. And that's	5	ADAM RENFANDT: They haven't.
6	another	6	COMMISSIONER FEDORCHAK: I don't think so.
7	COMMISSIONER FEDORCHAK: that help to	7	ADAM RENFANDT: No, no. No, they haven't.
8	(indiscernible) how and they're not like, you know,	8	COMMISSIONER FEDORCHAK: All right.
9	meeting like a hundred percent of any future. They're	9	ADAM RENFANDT: So then kind of moving onto the
10	just used as the guidelines to begin to imagine what	10	next page, so these are the benefits that they've
11	kind of system we're going to need. Because nobody	11	identified. The first benefit is
12	really knows, but these are the things that direct and	12	COMMISSIONER FEDORCHAK: Let's talk for a minute
13	guide what this future system they think is going to	13	about how these get developed.
14	need based on what people are putting in their plans.	14	ADAM RENFANDT: Okay.
15	ADAM RENFANDT: And that's an important point	15	COMMISSIONER FEDORCHAK: Because each one of
16	because we're looking at the year 2039. And by 2039, in	16	these processes is like a big, long, you know,
17	this particular case of what what all of this benefit	17	stakeholder input on identifying what benefits are going
18	metrics is based upon is that you meet 100 percent of	18	to be used to measure the overall the overall benefit
19	your IRP goals or not we, but MISO will say we're	19	calculation. And these are where you get some questions
20	going to meet a hundred percent of our IRP goals and	20	from the (indiscernible). The last I he's he's
21	we're going to meet 85 percent of our aspirational goals	21	pretty squishy on some of these benefit metrics, but
22	that that they that Commissioner Fedorchak was	22	even more so on Tranche 2.
23	just describing.	23	So, anyway, was there anything in particular
24	COMMISSIONER FEDORCHAK: And I do think it's	24	about these benefit metrics that raised concern in the
25	important to re-emphasize that MISO is trying to build a	25	stakeholder process, Adam?
	PAGE 9		PAGE 11
1	system that enables the meeting of those. They aren't	1	I mean, I know we we said that we objected
2	meeting them. They're building a system that allows	2	to the decarbonization benefit being used. And so then,
3	their members to meet their IRP goals and, like Adam	3	in response to that, they took that out and told us what
4	said, 85 percent of the state mandates as a planning	4	our cost-benefit would be without it. And it was still
5	that's how they plan. It's their planning protocol.	5	higher than the one threshold. Significantly higher.
6	So back to this resource additions, this is	6	ADAM RENFANDT: Yeah. And it there's very
7	based on what they're seeing in North Dakota IRPs	7	little benefit that's derived from this decarbonization
8	mostly?	8	benefit. The BC, the benefit-cost ratio, goes when
9	ADAM RENFANDT: IRPs. They will put in some	9	you remove it, goes from 2.8 to 2.6. So that's kind of
10	units that are model built	10	saying if you spend, like, a dollar, you get \$2.06 back.
11	COMMISSIONER FEDORCHAK: For reliability? To	11	COMMISSIONER CHRISTMANN: So the two
12	meet reliability standards?	12	overwhelmingly large factors in the in the benefit
13	ADAM RENFANDT: For yeah, for yeah, for	13	column for Zone 1 are, one, congestion and fuel savings,
14	reliability standards as well as engineering kind of	14	two, avoided capital cost of local resource investment;
15	judgment, I guess, if you will.	15	correct?
16	You know, you'll notice that there's you	16	ADAM RENFANDT: Correct. Yep.
17	know, on this case, you know, there's actually a	17	COMMISSIONER CHRISTMANN: Okay. For this
18	combined cycle gas being built. You know, that was	18	project, not Tranche 1 but this project, and for North
		19	Dakota, not MISO, what are the avoided capital costs of
19	you know, that's likely the the conversion of maybe	20	
20	you know, that's likely the the conversion of maybe the goal		local resource investment that this what costs does
20 21		21	this avoid?
20 21 22	the goal	21 22	
20 21 22 23	the goal COMMISSIONER FEDORCHAK: Oh. Oh. They're	21 22 23	this avoid?
20 21 22	the goal  COMMISSIONER FEDORCHAK: Oh. Oh. They're looking at converting that to	21 22	this avoid?  ADAM RENFANDT: So this avoids the building of
20 21 22 23	the goal  COMMISSIONER FEDORCHAK: Oh. Oh. They're looking at converting that to  ADAM RENFANDT: Yeah.	21 22 23	this avoid?  ADAM RENFANDT: So this avoids the building of local generation that would cost more.

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1	only one I can think of.	1	COMMISSIONER CHRISTMANN: Well, he's kind of
2	COMMISSIONER FEDORCHAK: Again, it's modeled.	2	bringing their case.
3	It's not necessary	3	COMMISSIONER FEDORCHAK: He's been trying so
4	ADAM RENFANDT: Yeah. It's kind yeah, it's	4	that we can, yeah, understand.
5	kind of like, you know, when we had the original MVP	5	COMMISSIONER HAUGEN-HOFFART: And I guess that
6	portfolio, we had to we could share resources and	6	was my question in looking at some of this, is how much
7	then reduce local overbuild.	7	of this, I mean, gets updated as things go on? Like
8	So if we're able to spread that out with	8	Randy brought up Applied Digital. I mean, how is that
9	transmission, then there's a point in which you're	9	fed into MISO and updated so we have current more
10	supposed to hit the sweet spot, and it's called the	10	current information? I mean
11	"bathtub curve," right, in which you want to put your	11	COMMISSIONER FEDORCHAK: Once these projects are
12	transmission overlay on your resources such that you're	12	approved, they don't go back and update all this. Like
13	all in a sharing pool and you're able to then not build	13	this was agreed on and approved by the board a year
14	something not have a grid that's Balkanized such that	14	more than a year ago. So they don't go back
15	or have no wires and we've got to overbuild a ton of	15	COMMISSIONER HAUGEN-HOFFART: Okay.
16	maybe thermal generation because we couldn't then use a	16	COMMISSIONER FEDORCHAK: and keep changing
17	renewable source maybe.	17	these.
18	COMMISSIONER CHRISTMANN: So the biggest share	18	COMMISSIONER HAUGEN-HOFFART: Okay.
19	of our benefits are avoiding costs that we can't	19	COMMISSIONER FEDORCHAK: and re-justifying
20	identify.	20	the case or changing the case.
21	COMMISSIONER FEDORCHAK: Well, that's not	21	COMMISSIONER HAUGEN-HOFFART: Well, I wouldn't
22	their model costs out to 2039. I mean, you have to look	22	have to say "re-justify" but just more accurate data
23	at the time frame. So and that these might be	23	that we as PUCs could have. Like when we when the
24	good questions for because MISO should be able to	24	when the Tranche 1, when this case comes before us, we
25	identify those things for this project, for that for	25	have more information, but lesson learned.
	PAGE 13		PAGE 15
1	actually this line or those two lines. So that's	1	COMMISSIONER FEDORCHAK: And we don't ever see
1 2	actually this line or those two lines. So that's probably a question we could ask them for to address.	2	COMMISSIONER FEDORCHAK: And we don't ever see all of Tranche 1.
	•	-	
2 3 4	probably a question we could ask them for to address.  And I think it's an important one to understand, you know, how all this stuff is pulled together.	2 3 4	all of Tranche 1.
2 3 4 5	probably a question we could ask them for to address.  And I think it's an important one to understand, you	2 3 4 5	all of Tranche 1.  COMMISSIONER HAUGEN-HOFFART: Right.
2 3 4 5 6	probably a question we could ask them for to address.  And I think it's an important one to understand, you know, how all this stuff is pulled together.  COMMISSIONER CHRISTMANN: The other one that is very significant in that is the congestion and fuel	2 3 4 5 6	all of Tranche 1.  COMMISSIONER HAUGEN-HOFFART: Right.  COMMISSIONER FEDORCHAK: This is the only line  we'll see.  COMMISSIONER HAUGEN-HOFFART: Right. But things
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1	to that level of information and detail that MISO	1	know how the where or how the battle would occur,
2	COMMISSIONER HAUGEN-HOFFART: I got my answer.	2	but, okay, if the issue is somebody else out of state's
3	COMMISSIONER FEDORCHAK: And the thing is, the	3	need for energy and some developer that wants to come in
4	other thing to remember, and this is just a part of the	4	and set up some more wind farms here, fine, pay for it.
5	reality of MISO, is if you look at the size of our zone,	5	Not our ratepayers all the time.
6	I mean there's a lot of what's happening in Minnesota	6	And so, yes, the RTO forces this cost allocation
7	and part of Wisconsin driving Zone 1. And that's	7	on us, but if we don't fight for it or fight against
8	that's the reality for us in North Dakota and MISO.	8	it successfully, guess what? We're going to be paying
9	Zone 1 includes all of Minnesota and a chunk of	9	for was it three that's all south so maybe not that
10	Wisconsin.	10	maybe not one of them, but we're going to be paying
11	VICTOR SCHOCK: So especially on the fuel	11	for all the rest of them too. And when better than now
12	cost savings, it's one because both RTOs do that kind	12	to fight it?
13	of comparison when they run modeling. And it's one	13	COMMISSIONER FEDORCHAK: I don't disagree. And
14	thing I've really struggled with in our zone. Usually	14	we did fight it. But we
15	we have trapped generation that can't get out. And when	15	COMMISSIONER CHRISTMANN: MISO.
16	they do their model, well, this zone or this area is	16	COMMISSIONER FEDORCHAK: At MISO, yeah.
17	going to benefit by that trap generation getting out.	17	COMMISSIONER CHRISTMANN: I'm talking about at
18	Well, I suppose the zone as a whole is going to benefit,	18	FERC.
19	but our prices go up as a result of it.	19	COMMISSIONER HAUGEN-HOFFART: So is that how it
20	COMMISSIONER FEDORCHAK: Right.	20	would play out, I mean, going off of that? Tell me
21	VICTOR SCHOCK: So that negative that	21	COMMISSIONER FEDORCHAK: Yeah, I don't know.
22	negative congestion that's happening down there changes	22	COMMISSIONER HAUGEN-HOFFART: Can you walk me
23	to even keel with the rest of the system. And primarily	23	well, first of all, does anybody have anything else,
24	in this instance, I think Minnesota's prices probably go	24	Chris or Adam, to add to these?
25	down a slight bit	25	CHRIS HANSON: Just a scale sorry. I was
	PAGE 17	_	PAGE 19
1	COMMISSIONER FEDORCHAK: Yep.	1	just going to add that the scale of Tranche 1, the
2	VICTOR SCHOCK: while ours go up to what the	2	numbers that we got from MDU and from Otter Tail were
3	rest of the zone is seeing.	3	like 10 and a half billion or somewhere between 10 and
4	COMMISSIONER CHRISTMANN: And this is kind of	4	10 and a half billion, and the cost per megawatt-hour
5	one of my concerns here, is so our ratepayers pay to	5	that they were estimating in 2031, which was the max
6	build this and the benefits are looked at, well, is this	6	rate, was about \$2.54 per megawatt. So so or
8	investment here some big benefit, but it's mostly to whoever the new developer is that comes in and builds	8	megawatt-hour. So just as kind of a as a scale.  Now that how that impacts, say, residential
9	another wind farm. A few landowners but not to most of	9	customers is going to depend upon the company. Because
10	these Otter Tail and MDU customers. And I'm just I'm	10	each of the companies has their own allocation
11	not seeing nearly the benefits or congestion	11	methodology for transmission costs. But just to kind of
12	improvements as what this seems to want to indicate.	12	give you an average on things, the Tranche 1, on
13	COMMISSIONER FEDORCHAK: Well, the other issue	13	average, would be about, you know, \$2.54 per
14	that I think is two other issues that are relevant	14	megawatt-hour.
15	are the reliability savings or reliability impacts and	15	So I'll throw NSP, as an example, does a
16	are the access for our broader generation to get out. I	16	direct allocation per megawatt-hour so that would affect
17	mean, if there's congestion, there's generators in North	17	their customers by \$2.54 per month for a thousand
18	Dakota that are being curtailed. And depending on	18	kilowatts or 1 megawatt of use or megawatt-hour of
19	price, you know, that hurts them. And, you know, the	19	usage per month.
20	higher-price ones are the ones probably being curtailed	20	But then we talked about Tranche 2, 3, 4. You
21	first. So that's that's another North Dakota issue.	21	know, as you're getting up into that 50 billion range,
22	COMMISSIONER CHRISTMANN: You know, I guess it's	22	then, you know, you're talking 10, \$15 per megawatt-hour
23	a separate argument of whether this is the right time to	23	as a relative scale.
24	have the battle, but therein lies a lot of the reason	24	COMMISSIONER CHRISTMANN: Okay. Then I need to
25	for me wanting to take on the battle, and I don't even	25	be corrected here and find out where I'm wrong. When we
	PAGE 18		PAGE 20
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	had our	1	COMMISSIONER FEDORCHAK: Sure.
2	COMMISSIONER HAUGEN-HOFFART: Informal?	2	COMMISSIONER CHRISTMANN: I mean if if it
3	COMMISSIONER CHRISTMANN: informal on	3	went to court and the courts backed the Commission on a
4	July 8th, I didn't write down \$2.54 a month. I wrote	4	denial or, no, overturned the Commission on a denial,
5	\$3.15 a month for	5	well, then it would move forward unless we appealed.
6	CHRIS HANSON: Yep.	6	But let's say they backed our decision on a denial,
7	COMMISSIONER CHRISTMANN: MDU and 5.85 for	7	wouldn't at some point this get to be a FERC thing over
8	CHRIS HANSON: Correct.	8	whether the states can stop and this could be SPP
9	COMMISSIONER CHRISTMANN: Otter Tail.	9	too stop RTO-approved projects through their PC&N
10	CHRIS HANSON: Correct. So as I said, MDU and	10	process? Isn't that something that is going to have to
11	Otter Tail have an allocation methodology that's	11	get determined at some point? Or are they just all
12	different for residential and for commercial,	12	going to go to load pays?
13	industrial. I'll use NSP as an example because they do	13	UNIDENTIFIED SPEAKER: So I'm guessing the issue
14	a per-megawatt-hour allocation so it's a straight	14	that you're presenting is an interstate commerce issue
15	COMMISSIONER CHRISTMANN: Oh.	15	from the discussion that you're providing. And I'd be
16	CHRIS HANSON: It's a different methodology but	16	happy to have some additional discussion with that, but
17	it's it's, I guess you could say, cleaner. But the	17	I probably would not want to be having that in in
18	average that MISO was allocating, their number was \$2.54	18	open meeting without having an opportunity to review the
19	based upon their estimates at the peak in 2031 when all	19	tariffs that we're discussing.
20	the projects are up and running before they start to	20	COMMISSIONER CHRISTMANN: So we've kind of
21	amortize off.	21	touched on these, but I want to re-emphasize two points.
22	So, yes, you are correct. Like MDU's number,	22	One is, yes, we can talk about avoiding congestion or
23	MDU's number was \$3.15. The memo that I had was 5.75.	23	avoiding additional investment costs. I haven't found
24	And I think Matt Olsen came back and amended that to	24	any basis for those other than someone who likes doing
25	5.85 per megawatt-hour. So that's because they used	25	projects, putting numbers together, I I can't see
	PAGE 21		PAGE 23
1	different methodology for allocating those transmission	1	anything.
2	costs. So you are correct.	2	I will point out, though, that among the project
3	COMMISSIONER FEDORCHAK: Okay. So I and	3	benefits are to accommodate new electric generation
3 4	COMMISSIONER FEDORCHAK: Okay. So I and Randy raised a good question about how, if we deny this,	3 4	benefits are to accommodate new electric generation projects. That, to me, that's who ought to be paying at
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1	Ellendale point down through South Dakota and Minnesota	1	excessive thermal loadings for N-1 contingencies and 70
2	and out, but if there's problems there, they need this	2	elements with excessive loading, and then down below the
3	alternative route to get it up to Jamestown and then	3	project improves voltages in the Red River Valley by
4	from there on it can flow through Fargo and away.	4	relieving 97 voltage violations and 91 voltage
5	Okay. If as far as to add the new	5	violations for N-1-1 contingencies, like how many of
6	generation, I guess that makes sense. It also tells me	6	those are North Dakota customers? How much of that is
7	there's plenty of capacity in the transmission lines	7	how much of that is a North Dakota issue?
8	between Jamestown and Fargo for all this to flow that	8	I mean, I am I want to know I would have
9	way, which tells me when Xcel builds their gas plant	9	to be reminded of that. I'd have to have a more
10	there, it can flow the other way and that can just as	10	technical discussion, I think, with the company to
11	easily be used to help solve any potential energy	11	understand the implications for our customers of not
12	shortfalls in Jamestown.	12	having this line.
13	And so I think the one investment that I can see	13	VICTOR SCHOCK: Isn't N-1 what drives congestion
14	that this is going to eliminate the need for is that	14	pricing?
15	generation plant. And I guess it's fine as long as	15	COMMISSIONER FEDORCHAK: I don't
16	we're willing to have service when it's windy but not	16	Adam?
17	when it's not. I don't think most of the people are.	17	ADAM RENFANDT: If it's overloaded, so if it's
18	COMMISSIONER FEDORCHAK: Randy, did you review	18	overloaded, it could be overloaded for a number of
19	the project benefits identified in the companies'	19	reasons. You know, an outage definitely is it. I mean,
20	application?	20	that creates congestion such that, if you can't if
21	COMMISSIONER CHRISTMANN: I have, but it's been	21	you can't have if you can't fire up or move electrons
22	a while and I don't know if I have	22	from point A to point B and then you might have to go
23	COMMISSIONER FEDORCHAK: How did we we had an	23	and fire up a more expensive peaker, for instance, if
24	informal, right	24	you've got a line outage, for instance.
25	COMMISSIONER HAUGEN-HOFFART: Yeah.	25	VICTOR SCHOCK: Right.
	PAGE 25		PAGE 27
1	COMMISSIONER FEDORCHAK: on this? That's how	1	ADAM RENFANDT: Or something like that, yeah.
2	we	2	VICTOR SCHOCK: But congestion pricing and
3	COMMISSIONER CHRISTMANN: Was that presented	3	this is, I think, the case in both RTOs. It isn't
4	then or was that in the case earlier?	4	because the lines that are in operation at that moment
5	COMMISSIONER HAUGEN-HOFFART: Well, it's	5	can't handle the load that's going across them. It's in
6	both.	6	the event of a loss of your biggest element
7	COMMISSIONER FEDORCHAK: Both.	7	ADAM RENFANDT: Uh-huh.
8	COMMISSIONER HAUGEN-HOFFART: It's in their	8	VICTOR SCHOCK: the remaining system isn't
9	application and the	9	able to pick that load up without tripping.
10	COMMISSIONER CHRISTMANN: What you're looking	10	ADAM RENFANDT: It doesn't have to be like
11	at, though	11	you can get congestion if it just if it in the
12	COMMISSIONER FEDORCHAK: This is their	12	event that it would if in the event that you had an
13	application.	13	outage.
14	COMMISSIONER CHRISTMANN: this.	14	VICTOR SCHOCK: Right.
15	COMMISSIONER FEDORCHAK: Right.	15	ADAM RENFANDT: In that case, yeah, then
16	COMMISSIONER CHRISTMANN: Okay.	16	yeah, then you but you're not actually in an outage.
17	COMMISSIONER FEDORCHAK: This is the	17	VICTOR SCHOCK: Right. No, I absolutely agree
18	application.	18	that you're not in an outage, but the pricing for
19	COMMISSIONER CHRISTMANN: What page?	19	congestion, I think, is based on that N-1 scenario.
20	COMMISSIONER FEDORCHAK: 11. And to some extent	20	ADAM RENFANDT: Yeah, that's how the grid
21	page 9 is the project need.	21	operates. Yeah. Yep.
22	COMMISSIONER CHRISTMANN: Okay.	22	VICTOR SCHOCK: So all that is to say I think
23	COMMISSIONER FEDORCHAK: I just don't know when	23	that's a good portion of what they're speaking to in the
24	they when all these problems, these reliability	24	40 elements with excessive loading for the first
25	problems, like at 40 transmission elements with	25	transmission element loss.
1	PAGE 26		PAGE 28
	FAGE 20		1,762.26

1	ADAM RENFANDT: Yeah, yeah, that's	1	applied to all of Zone 1, but of that of these
2	VICTOR SCHOCK: I think that's largely	2	issues, how many how much of the issue applied to
3	congestion.	3	North Dakota specifically?" So we're kind of getting
4	I don't know if that does that make some	4	lumped in with the whole zone.
5	sense?	5	COMMISSIONER FEDORCHAK: Right.
6	COMMISSIONER FEDORCHAK: And so?	6	UNIDENTIFIED SPEAKER: And this is the issue to
7	VICTOR SCHOCK: I'm not drawing any conclusions	7	the whole zone, but how much of it applies specifically
8	from that. It was just that you started to kind of talk	8	to us?
9	about it a little bit and I I don't know that that's	9	COMMISSIONER FEDORCHAK: Yeah. And what is the
10	the entire answer	10	impact of this? Is it a price issue? Is it is it a
11	COMMISSIONER FEDORCHAK: So the benefits of	11	lot you know, we can't get power at certain times?
12	relieving that are it's not a reliability concern.	12	It's hurting the lines? Like what is the actual what
13	VICTOR SCHOCK: Not I'm not even saying that	13	are the issues that it's causing?
14	definitively. I think your question was what those 40	14	Yeah, and same I mean, the company might have
15	elements are. And I think probably a good chunk of them	15	a probably MISO needs to get us more specifics of the
16	are probably that N-1 scenario where overloading	16	impacts of this project on the benefit metrics that
17	COMMISSIONER FEDORCHAK: Well, no. I'll put it	17	they've used here. And if they can get those for North
18	a lot more simply.	18	Dakota versus all of Zone 1, that would be helpful too.
19	VICTOR SCHOCK: Okay.	19	COMMISSIONER CHRISTMANN: You know, when when
20	COMMISSIONER FEDORCHAK: That's a lot of	20	it's simplified down, when and I don't know who was
21	technical mumbo jumbo. What I want to know is how does	21	speaking at the time, I presume Otter Tail because it
22	this matter to North Dakota customers?	22	was about Jamestown, but between the two when we had the
23	VICTOR SCHOCK: Sure.	23	informal, when they talked about that situation in
24	COMMISSIONER FEDORCHAK: Does it? Or is it just	24	Jamestown that I referenced earlier, okay, yeah, that is
25	a bunch of sentences to make it seem like, "Jeez, that	25	something that happened, aware of it, it made a good
	PAGE 29		PAGE 31
1	sounds bad, we better approve this"? Right?	1	case in point to me, I was thinking, okay, now I'm
2	VICTOR SCHOCK: Yeah.	2	seeing some benefit here until, like I say, then I
3	COMMISSIONER FEDORCHAK: So I don't know.	3	thought more about it, except for, supposedly, within a
4	Maybe	4	little over a year or things usually run late, but in
5	VICTOR SCHOCK: Sure.	5	
	Vietor Schook. Suic.	5	the relatively near term we had a new gas plant go in
6	COMMISSIONER FEDORCHAK: it is a bunch	6	Fargo. That should be able to do it. I guess when they
6 7			
	COMMISSIONER FEDORCHAK: it is a bunch	6	Fargo. That should be able to do it. I guess when they
7	COMMISSIONER FEDORCHAK: it is a bunch maybe it is a big problem for North Dakota customers,	6	Fargo. That should be able to do it. I guess when they just say, "Oh, well, there's all these benefits," it's
7	COMMISSIONER FEDORCHAK: it is a bunch maybe it is a big problem for North Dakota customers, maybe it isn't. I don't I can't tell by this, and I	6 7 8	Fargo. That should be able to do it. I guess when they just say, "Oh, well, there's all these benefits," it's not very persuasive to me.
7 8 9	COMMISSIONER FEDORCHAK: it is a bunch maybe it is a big problem for North Dakota customers, maybe it isn't. I don't I can't tell by this, and I don't recall exploring that deeply in our informal with	6 7 8 9	Fargo. That should be able to do it. I guess when they just say, "Oh, well, there's all these benefits," it's not very persuasive to me.  COMMISSIONER FEDORCHAK: Uh-huh.
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7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	COMMISSIONER FEDORCHAK: it is a bunch maybe it is a big problem for North Dakota customers, maybe it isn't. I don't I can't tell by this, and I don't recall exploring that deeply in our informal with them. So I would want to know that so we don't you know, so I can have that information VICTOR SCHOCK: Yep. COMMISSIONER FEDORCHAK: in making my decision anyway. VICTOR SCHOCK: Do you want to know that from the company or from MISO? COMMISSIONER HAUGEN-HOFFART: The company. COMMISSIONER FEDORCHAK: The company. COMMISSIONER HAUGEN-HOFFART: It's in their application. UNIDENTIFIED SPEAKER: So just for clarification on that, they're basically saying when they analyze this	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Fargo. That should be able to do it. I guess when they just say, "Oh, well, there's all these benefits," it's not very persuasive to me.  COMMISSIONER FEDORCHAK: Uh-huh.  COMMISSIONER CHRISTMANN: Tell me what they are, where the shortages are, what can't we do. And we'll see once whether it seems it to me that or it seems to us as a group, as a body, whether those benefits then are primarily going to the ratepayers that are being asked to pay for this or to somebody else.  COMMISSIONER FEDORCHAK: Yep. Good questions.  As you said, like, we tried in the cost allocation discussion to make these points. They weren't they didn't win the day. This is our next this is our next tool to try to address them.  COMMISSIONER CHRISTMANN: And while we're on this, I a legal question oh, did you have
7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	COMMISSIONER FEDORCHAK: it is a bunch maybe it is a big problem for North Dakota customers, maybe it isn't. I don't I can't tell by this, and I don't recall exploring that deeply in our informal with them. So I would want to know that so we don't you know, so I can have that information VICTOR SCHOCK: Yep. COMMISSIONER FEDORCHAK: in making my decision anyway. VICTOR SCHOCK: Do you want to know that from the company or from MISO? COMMISSIONER HAUGEN-HOFFART: The company. COMMISSIONER FEDORCHAK: The company. COMMISSIONER HAUGEN-HOFFART: It's in their application. UNIDENTIFIED SPEAKER: So just for clarification on that, they're basically saying when they analyze this solution, they're kind of looking at it in conjunction	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Fargo. That should be able to do it. I guess when they just say, "Oh, well, there's all these benefits," it's not very persuasive to me.  COMMISSIONER FEDORCHAK: Uh-huh.  COMMISSIONER CHRISTMANN: Tell me what they are, where the shortages are, what can't we do. And we'll see once whether it seems it to me that or it seems to us as a group, as a body, whether those benefits then are primarily going to the ratepayers that are being asked to pay for this or to somebody else.  COMMISSIONER FEDORCHAK: Yep. Good questions.  As you said, like, we tried in the cost allocation discussion to make these points. They weren't they didn't win the day. This is our next this is our next tool to try to address them.  COMMISSIONER CHRISTMANN: And while we're on this, I a legal question oh, did you have something else?

1	ND 1 ODLIO OLIV	1	
1	sure that this doesn't have just merits for North Dakota	1	there. There's a bunch more how many more wind farms
2	on on a technical side so I'm not, like I'm very	2	did they model being developed in the eastern part of
3	open to hearing what the benefits are to our customers	3	North Dakota that will drive congestion up again? And
4	because I I think that there are and to our	4	those were driven by probably by Minnesota
5	generators, I guess. I'd like to evaluate be	5	environmental goals and others but yeah.
6	evaluating that along with it. So	6	UNIDENTIFIED SPEAKER: Yeah.
7	COMMISSIONER CHRISTMANN: I think you got it	7	COMMISSIONER FEDORCHAK: That would be helpful
8	covered.	8	to know, what kind of generation they modeled in that
9	VICTOR SCHOCK: So to clarify clarify what I	9	area
10	think I heard, so we're going to get a response from	10	UNIDENTIFIED SPEAKER: And where.
11	MISO on the benefit metrics for Zone 1 on this line	11	COMMISSIONER FEDORCHAK: for this.
12	specifically. So I think if Adam can reach out, that's	12	UNIDENTIFIED SPEAKER: Yeah, we can we can
13	probably the most efficient.	13	get that.
14	And then whatever response you get, if you want	14	COMMISSIONER HAUGEN-HOFFART: And I think
15	to pass that through Chris.	15	separately, I mean we're going to work with Jack as far
16	And then, Chris, if you can work with Otter Tail	16	as maybe some next steps
17	and MDU on a response for what these elements savings	17	UNIDENTIFIED SPEAKER: Sure.
18	and benefits are. And then, you know, if it's	18	COMMISSIONER HAUGEN-HOFFART: if denied just
19	reliability benefit, how and what circumstance?	19	for an understanding as far as litigation.
20	And we'll get all of that submitted into a	20	UNIDENTIFIED SPEAKER: Be happy to have that
21	couple of docket entries, hopefully, rather than just	21	discussion. I would note as well, though, after we
22	some emails flying around. And	22	receive all the documents, all the information that's
23	COMMISSIONER CHRISTMANN: And, you know, yes, I	23	necessary, it may be worth considering appointing
24	know these things take time, but there's a reason why	24	advocacy staff if we need to flush out certain issues a
25	they take time, so people don't make bad decisions. But	25	little better and maybe have a formal hearing on it as
	PAGE 33		PAGE 35
4	it sooms like as far as the anything having to do	1	well.
1	il avalua incega igi ga inc gitvililiu havihu 10 00		
1 2	it seems like as far as the anything having to do with congestion in that area of the state, this should		
2	with congestion in that area of the state, this should	2	COMMISSIONER FEDORCHAK: Yeah. That's a good
2	with congestion in that area of the state, this should be recalculated based on Applied Digital's second phase	3	COMMISSIONER FEDORCHAK: Yeah. That's a good point. I'd be open to that, because I really do want to
2 3 4	with congestion in that area of the state, this should be recalculated based on Applied Digital's second phase being in effect. Because I understand they're pretty	2 3 4	COMMISSIONER FEDORCHAK: Yeah. That's a good point. I'd be open to that, because I really do want to understand the companies' side of it and the benefits
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2 3 4 5 6	with congestion in that area of the state, this should be recalculated based on Applied Digital's second phase being in effect. Because I understand they're pretty far along with it already and the first phase is already going. And, like I say, from my just viewing of heat	2 3 4 5 6	COMMISSIONER FEDORCHAK: Yeah. That's a good point. I'd be open to that, because I really do want to understand the companies' side of it and the benefits that they are seeing.  COMMISSIONER CHRISTMANN: Anything else?
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# August 19, 2024, Work session ND PUBLIC SERVICE COMMISSION

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