

Thompson, Pamela J.

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Filing Accepted

Envelope Number: 6287213

Case Number: 08-2025-CV-02068

Case Style: Wano Township, et al. vs. North Dakota Public Service Commission, et al.

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Filing Details	
Court	Burleigh County
Case Number	08-2025-CV-02068
Case Style	Wano Township, et al. vs. North Dakota Public Service Commission, et al.
Date/Time Submitted	9/9/2025 12:45 PM CST
Date/Time Accepted	9/9/2025 1:12 PM CST
Accepted Comments	
Filing Type	Exhibit
Filing Description	Exhibit 1 - Joint Application for Certificate of Public Convenience and Necessity
Activity Requested	EFile
Filed By	Pamela Thompson
Filing Attorney	Brian Johnson

Document Details	
Lead Document	Exhibit 1 - Joint Application for Certificate of Public Convenience and Necessity.pdf
Lead Document Page Count	23
File Copy	View Document

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February 29, 2024

Steve Kahl
Director of Administration / Executive Secretary
North Dakota Public Service Commission
State Capitol Building
600 East Boulevard
Bismarck, ND 58505-0480

**RE: In the Matter of Otter Tail Power Company's and Montana-Dakota Utilities Co.'s
Joint Application for a Certificate of Public Convenience and Necessity for a 345 kV
Transmission Line from Jamestown, North Dakota to Ellendale, North Dakota
Case No. PU-24-_____**

Dear Mr. Kahl:

Enclosed for filing in the above-referenced matter is Otter Tail Power Company's ("Otter Tail") and Montana-Dakota Utilities Co.'s ("Montana-Dakota", together with Otter Tail "Applicants") Joint Application for a Certificate of Public Convenience and Necessity to construct, own and operate approximately 85 miles of new double circuit 345 kilovolt ("kV") electric transmission line from Otter Tail's existing Jamestown 345 kV Substation in Stutsman County to Montana-Dakota's existing Ellendale 345 kV Substation in Dickey County ("Transmission Line"), in addition to substation expansions at the Jamestown 345 kV Substation, Ellendale 345 kV Substation, Maple River 345 kV Substation and the Twin Brooks 345 kV Substation ("Project"). The Project was identified and approved by the Midcontinent Independent System Operator, Inc. ("MISO") as part of its Long-Range Transmission Planning ("LRTP") Tranche 1 Portfolio through the 2021 MISO Transmission Expansion Plan ("MTEP21").

Otter Tail and Montana-Dakota intend to jointly own the Transmission Line and the expansion at the Twin Brooks 345 kV Substation. Montana-Dakota will construct, own, and operate the substation expansion at Ellendale while Otter Tail will construct, own and operate the expansions required at the Jamestown 345 kV Substation and the Maple River 345 kV Substation. For the sake of efficiency, Applicants hereby jointly apply for a Certificate of Public Convenience and Necessity for the Project for consideration by the North Dakota Public Service Commission ("Commission").

Otter Tail submits a check in the amount of \$10,000 on behalf of Applicants as partial payment of the fee ultimately required by the Commission. Otter Tail will submit additional funds on behalf of Applicants as ordered by the Commission, up to \$175,000 as set forth under N.D.C.C. § 49-03-02(3). Applicants also respectfully request that this filing be accepted as being in full compliance with the filing requirements of this Commission.

An electronic copy of this Application is being sent to you at skahl@nd.gov and to NDPSC@nd.gov. Copies will be sent to you by First Class mail.

Please refer all inquiries regarding this filing to:

Matthew Olsen
Manager, Regulatory Strategy & Compliance
Otter Tail Power Company
215 South Cascade Street
P.O. Box 496
Fergus Falls, MN 56538-0496
(218)739-8657

Travis R. Jacobson
Director, Regulatory Affairs
Montana-Dakota Utilities Co.
400 North Fourth Street
Bismarck, ND 58501
Phone (701) 222-7855

Also, please send copies of all written inquiries, correspondence, and pleadings to:

Robert M. Endris
Associate General Counsel
Otter Tail Power Company
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Fergus Falls, MN 56538-0496
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Allison Waldon
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Phone (701)530-1089

Mr. Kahl
February 29, 2024
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If you have any questions, do not hesitate to contact me at (218) 739-8657 or molsen@otpco.com or Travis Jacobson at (701) 222-7855 or travis.jacobson@mdu.com.

Sincerely,

/s/ MATTHEW J. OLSEN
Matthew Olsen
Manager, Regulatory Strategy & Compliance

/s/ TRAVIS JACOBSON
Travis R. Jacobson
Director, Regulatory Affairs

Enclosures
By electronic service and First-Class mail

Cc: Robert M. Endris
Allison Waldon

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF NORTH DAKOTA**

In the Matter of the Joint Application of)
OTTER TAIL POWER COMPANY and)
MONTANA-DAKOTA UTILITIES CO. for)
a Certificate of Public Convenience and) Case No. PU-24-_____
Necessity for a 345 kV Transmission Line)
from Jamestown, North Dakota to Ellendale,)
North Dakota.)

**JOINT APPLICATION OF OTTER TAIL POWER COMPANY AND MONTANA-
DAKOTA UTILITIES CO. FOR A CERTIFICATE
OF PUBLIC CONVENIENCE AND NECESSITY**

I. INTRODUCTION

Otter Tail Power Company (“Otter Tail”) and Montana-Dakota Utilities Co. (“Montana-Dakota”, or together as “Applicants”), make this Application, pursuant to Chapter 49-03 of the North Dakota Century Code (“NDCC”), for a Certificate of Public Convenience and Necessity to construct, own, and operate approximately 85-miles of new double circuit 345 kilovolt (“kV”) electric transmission line from Otter Tail’s existing Jamestown 345 kV Substation in Stutsman County to Montana-Dakota’s existing Ellendale 345 kV Substation in Dickey County (“Transmission Line”).¹ In addition to the Transmission Line, substation work at Otter Tail’s Jamestown 345 kV Substation, Maple River 345 kV Substation as well as Montana-Dakota’s Ellendale 345 kV Substation, and the Applicants’ co-owned Twin Brooks Substation² will also be completed to reliably integrate the Transmission Line into the transmission system (“Project”).

The Project was identified and approved by the Midcontinent Independent System Operator, Inc. (“MISO”) as part of its Long-Range Transmission Planning (“LRTP”) Tranche 1

¹ The Applicants are requesting a Certificate of Public Convenience and Necessity for a double circuit 345 kV line although the Applicants only plan to install one 345 kV circuit initially. The Applicants commit to provide subsequent notice to the Commission when they plan on installing the second 345 kV circuit on the existing structures in the future.

² The Twin Brooks Substation is located near Twin Brooks, South Dakota, along the Big Stone South – Ellendale 345 kV Transmission Line.

Portfolio.³ As described in more detail below, the Project is one of eighteen new transmission projects that will provide significant benefits to the Midwest subregion of MISO by enabling more reliable and economic energy delivery.

Otter Tail and Montana-Dakota intend to jointly construct and own the Transmission Line and expansion of the Twin Brooks 345 kV Substation as tenants-in-common with each Applicant owning fifty percent of the new facilities. Montana-Dakota will construct, own and operate the expansion at the Ellendale 345 kV Substation while Otter Tail will construct, own, and operate the expansions required at the Jamestown 345 kV Substation and the Maple River 345 kV Substation. The Project is planned to be in-service by the end of 2028.

The remainder of this Application will provide additional support for the Applicants' request for a Certificate of Public Convenience and Necessity to construct, own, and operate the Project. The Application will address:

- Description of Applicants
- Standard of Review
- MISO's LRTP Tranche 1 Portfolio
- Description of the Project
- Project Need
- Project Alternatives
- Project Benefits
- Affidavit of Jason J. Weiers
- Affidavit of Robert R. Frank

II. GENERAL FILING INFORMATION

Pursuant to N.D. Admin. Code § 69-02-02-04, the North Dakota Public Service Commission's ("Commission") Rules of Practice and Procedure, the following information is provided:

³ See the MTEP21 Report Addendum at: [MTEP21 Addendum-LRTP Tranche 1 Report with Executive Summary625790.pdf \(misoenergy.org\)](https://misoenergy.org/MTEP21%20Addendum-LRTP%20Tranche%201%20Report%20with%20Executive%20Summary625790.pdf)

A. Name, address, and telephone number of the utilities making this filing.

Otter Tail Power Company
215 South Cascade Street
P.O. Box 496
Fergus Falls, MN 56538-0496
Phone (218) 739-8200

Montana-Dakota Utilities Co.
400 North Fourth Street
Bismarck, ND 58501
Phone (800)-638-3278

B. Name, address, and telephone number of the attorneys for the Applicants.

Robert M. Endris
Associate General Counsel
Otter Tail Power Company
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P.O. Box 496
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Allison Waldon
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MDU Resources Group, Inc.
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C. Name, address, and telephone number of utility employees responsible for filing.

Matthew Olsen
Manager, Regulatory Strategy & Compliance
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D. The date of filing and the date changes will take effect.

The date of this filing is February 29, 2024. The date that changes will take effect will be when the Project is energized, which is estimated to be December 31, 2028.

E. Other requirements of North Dakota Administrative Code § 69-02-02-04.

A certified copy of Otter Tail's Articles of Incorporation is on file with the Commission in Case No. PU-09-677, as is Otter Tail's 2024 certificate of good standing in Case No. PU-23-039.

A certified copy of Montana-Dakota's Articles of Incorporation is on file with the Commission in Case No. PU-08-710, as is Montana-Dakota's 2024 certificates of good standing.

F. Standard of Review

This Application is being made pursuant to the provisions of Chapter 49-03 of the North Dakota Century Code, and the rules and regulations promulgated by the Public Service Commission of the State of North Dakota. Under this statute, the overall standard applied by the Commission is whether public convenience and necessity will be served by the Applicants' construction and operation of the Project and whether the Applicants are fit, willing, and able to provide service.

Applicants state that the Project is being developed collaboratively with MISO as a Multi-Value Project ("MVP") which will not provide direct retail service and will not interfere with the service provided by any utilities in the area. The Project provides regional transmission capacity, among several other benefits described below, that can be accessed by any interested stakeholder.

The Project is required to be built as part of MISO's LRTP Tranche 1 Portfolio approved as part of the 2021 MISO Transmission Expansion Plan ("MTEP21") and the Applicants are fit, willing, and able to construct, own, and operate the Project.

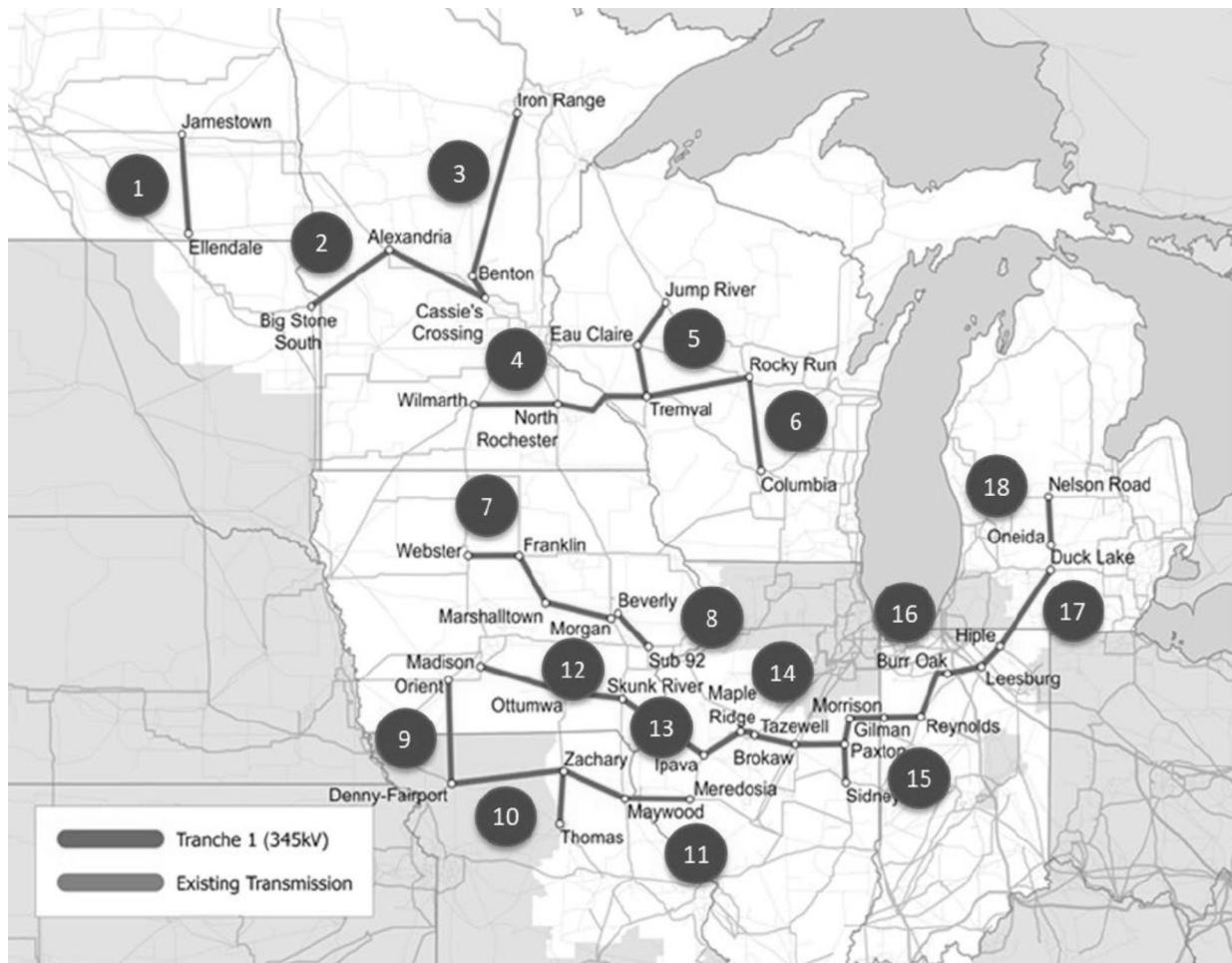
III. MISO'S LRTP TRANCHE 1 PORTFOLIO

The generation mix in North Dakota and the surrounding states has significantly changed over the past several decades shifting to a more diverse generation mix that includes increasing amounts of non-dispatchable generation. This evolution of the grid has resulted in generation resources being constructed faster than the regional transmission system leading to insufficient transmission capacity with increased transmission congestion and generation curtailments.

Recognizing this lack of transmission capacity and the forecasted trend of continued changes to the generation mix, MISO initiated the LRTP study in 2020 with the objective to provide an orderly and timely transmission expansion plan that results in a transmission system that is reliable, cost-efficient, accessible, and flexible.⁴ In July 2022, MISO approved the first phase or “tranche” of transmission projects through its LRTP study (“MISO LRTP Tranche 1 Portfolio”). The MISO LRTP Tranche 1 Portfolio consists of 18 transmission projects, including the Project, identified as project number one in Figure 1. In total, the MISO LRTP Tranche 1 Portfolio represents over 2,000 miles of new and upgraded high voltage transmission lines totaling over \$10 billion in investment that will enhance connectivity and maintain reliability for the Midwest subregion of MISO.

⁴ MTEP21 Report Addendum: Section 3, Pages 10-14.

Figure 1 – MISO LRTP Tranche 1 Portfolio



MISO performed the LRTP study following the process outlined within its federally approved tariff. For a transmission project to be deemed necessary under MISO’s tariff, it must meet defined criteria. In the LRTP study, MISO, and numerous stakeholders including the Applicants, identified a transmission plan that simultaneously addressed multiple regional needs. Under the MISO tariff, a project is defined as a Multi-Value Project (“MVP”) if it (1) Addresses transmission issues associated with a projected violation of a reliability standard; (2) Provides multiple types of economic value across multiple pricing zones with a benefit-to-cost ratio of 1.0 or higher, or (3) Supports the reliable and economic delivery of energy in support of documented energy policy mandates or laws.⁵

⁵ MTEP21 Report Addendum: Section 2, Pages 6-8.

On July 15, 2010, MISO and the MISO transmission owners adopted revisions to the MISO Tariff to establish the MVP category of transmission projects and corresponding cost allocation provisions.⁶ MISO’s footprint has expanded since 2010 when the MVP category of transmission projects and corresponding cost allocation provisions were initially added to the MISO tariff. After extensive stakeholder discussions, MISO filed for a revised cost allocation methodology for MVPs in February 2022 to meet the unique needs of the expanded MISO footprint when developing the new transmission projects through the LRTP study.⁷ The Federal Energy Regulatory Commission approved this revised cost allocation methodology on May 18, 2022.⁸ Under this revised cost allocation methodology, costs for the MISO LRTP Tranche 1 Portfolio will be recovered on a pro-rata basis from load in the MISO Midwest subregion based on energy usage.⁹ Otter Tail’s and Montana-Dakota’s retail North Dakota load ratio shares in the MISO Midwest subregion represent approximately 0.62% and 0.88%, respectively.

IV. DESCRIPTION OF THE PROJECT

The Transmission Line is expected to be in Stutsman, LaMoure, and Dickey Counties and will consist of approximately 85 miles of new double circuit 345 kV transmission line from Otter Tail’s existing Jamestown 345 kV Substation near Jamestown, North Dakota to Montana-Dakota’s existing Ellendale 345 kV Substation near Ellendale, North Dakota. The Transmission Line is planned to initially be constructed with one circuit. The Applicants commit to provide subsequent notice to the Commission when they plan on installing the second 345 kV circuit in the future. The Applicants are planning to acquire a right-of-way of 150 feet wide to construct, operate, and maintain the Transmission Line.

⁶ See Midwest Independent Transmission System Operator, Inc. and the Midwest ISO Transmission Owners, Docket No. ER10-1791-000, at 1 (July 15, 2010) (MVP Filing). The MVP Filing was conditionally accepted by the FERC on December 16, 2010. *Midwest Indep. Transmission Sys. Operator, Inc.*, 133 FERC ¶ 61,221 (2010) (“MVP Order”), *order on reh’g*, 137 FERC ¶ 61,074 (2011) (MVP Rehearing Order).

⁷ See *Midcontinent Indep. Sys. Op., Inc. and MISO Transmission Owners*, Proposed Revisions to MISO Tariff to Modify Cost Allocation for Multi-Value Projects, Docket No. ER22-995-000 (Feb. 4, 2022).

⁸ *Midcontinent Indep. Sys. Op., Inc.*, 179 FERC ¶ 61,124; *order on reh’g*, 181 FERC ¶ 61,219 (2022).

⁹ MTEP21 Report Addendum: Section 3, Page 14.

The Transmission Line will be constructed with steel, single pole (monopole) double-circuit structures. Certain locations along the route may include multiple poles or other specialty structures (including H-frame or three-pole structures) to accommodate large angles where the transmission line changes direction or any other potential constraints that may be encountered along the route, including, but not limited to, the James River and existing transmission line crossings. The proposed structures typically range in height from approximately 75 to 175 feet tall with a typical span length between structures being between 900 to 1,300 feet. A steel, monopole structure is typically installed on a concrete foundation while an H-frame structure can either be installed on two concrete foundations or directly embedded in the ground.

In addition to the Transmission Line, Otter Tail is planning to expand the existing Jamestown 345 kV Substation to change the existing ring bus configuration to a breaker and half configuration by adding one new row of bus work and breaker positions to the 345 kV portion of the substation. This expansion will allow for additional terminal positions for the new Transmission Line and any associated reactive equipment along with adequate space for future interconnections. Otter Tail is expecting that the existing microwave tower will need to be relocated to accommodate this substation expansion. The current fenced area of the Jamestown Substation will be expanded to the north to accommodate this new substation equipment.

Likewise, Montana-Dakota is planning to expand the existing Ellendale 345 kV Substation to create a breaker and a half configuration to the 345 kV portion of the substation. New substation equipment necessary to accommodate the Transmission Line will include new termination structures, circuit breakers, relays, and associated control equipment. The current fenced area of the Ellendale 345 kV Substation is expected to expand as a part of the Project.

To reliably integrate the new Transmission Line into the transmission system, additional system upgrades are necessary at the existing Maple River 345 kV Substation and the Twin Brooks 345 kV Substation. The integration of the new Transmission Line will cause transmission system voltages to exceed voltage criteria in the areas of Big Stone, SD, and Ellendale, ND. To mitigate these high voltage concerns, reactors must be installed at the Applicants' co-owned Twin Brooks 345 kV Substation in South Dakota. To accommodate the reactors, the Twin Brooks 345 kV Substation will be expanded to include three additional 345 kV breakers and two 345 kV reactors. The substation expansion at Twin Brooks will be owned 50 percent by Otter Tail and the remaining 50 percent by Montana-Dakota as tenants-in-common.

In addition, the new Transmission Line will also cause excessive loading on both Otter Tail owned 345/230 kV transformers at the Maple River 345 kV Substation that will exceed their respective ratings. Due to this reliability concern, Otter Tail is planning to expand the Maple River 345 kV Substation, replace the existing 345/230 kV transformers and add a 345 kV ring bus. Otter Tail will solely own the new 345/230 kV transformers and other related equipment associated with the Maple River 345 kV Substation expansion.

The cost for the Project is estimated to be approximately \$440 million and is expected to be in service by the end of 2028. As an MVP under MISO's Tariff, the revenue requirement associated with the Project will be recovered through the MISO tariff and assigned to all electric loads within the Midwest subregion of MISO.

V. PROJECT NEED

As outlined in the MTEP21 Report Addendum, the existing 230 kV system in eastern North Dakota, eastern South Dakota, and west-central Minnesota is heavily constrained for many different seasons of the year. This existing 230 kV system has been playing a key role in transporting energy across a large geographical area as generation needs to be exported out of North Dakota and South Dakota into Minnesota. During peak load conditions, particularly in the winter season, this existing 230 kV system is a key link for serving load in central and northern Minnesota. The 230 kV system is at capacity during many times of the year and has been shown to experience many reliability concerns not only for N-1 contingencies¹⁰, but also for system intact conditions.¹¹ In addition, voltage depressions have been identified by MISO for the Red River Valley Area along the South Dakota, North Dakota, and Minnesota border.¹² MISO's LRTP study has shown that the Project, in combination with the Big Stone South – Alexandria – Big Oaks 345 kV project, most effectively addresses the reliability concerns described above.

¹⁰ An “N-1 contingency” is an event that involves the outage of a single generator or transmission facility.

¹¹ MTEP21 Report Addendum: Section 6, Page 23.

¹² MTEP21 Report Addendum: Section 6, Page 24.

VI. PROJECT ALTERNATIVES

MISO evaluated the Project in combination with another transmission project spanning between eastern South Dakota and central Minnesota as part of the LRTP study. Through the LRTP study, MISO evaluated several alternative combinations of two different projects to determine if any alternative more effectively addresses the reliability issues on the heavily constrained 230 kV system in eastern North Dakota, eastern South Dakota, and west-central Minnesota. More specifically, MISO evaluated five alternative combinations of projects to address the heavily constrained 230 kV system.

1. Jamestown – Ellendale 345 kV Line and Big Stone South – Alexandria 345 kV Line
2. Jamestown – Ellendale 345 kV Line and Big Stone South – Hankinson – Fergus Falls 345 kV Line
3. Jamestown – Ellendale 345 kV Line and Big Stone South – Hazel Creek – Blue Lake 345 kV Line
4. Jamestown – Ellendale 345 kV Line and Big Stone South – Alexandria 345 kV Line and Big Stone South – Hazel Creek – Blue Lake 345 kV Line
5. Jamestown – Ellendale 345 kV Line and Big Stone South – Breckenridge – Barnesville 345 kV Line

Based on MISO’s analysis, every combination of alternative projects considered by MISO includes the Project as a common solution to address the issues on the heavily constrained 230 kV system in eastern North Dakota, eastern South Dakota, and west-central Minnesota, which further reinforces the criticality of the Project to the Tranche 1 Portfolio.

VII. PROJECT BENEFITS

As shown in the MTEP21 Report Addendum, the Project, in combination with the Big Stone South – Alexandria – Big Oaks¹³ 345 kV project, addresses several loading and voltage issues in eastern North Dakota, eastern South Dakota, and west-central Minnesota by tying two existing 345 kV systems together.¹⁴ Collectively, the Project and the Big Stone South – Alexandria – Big Oaks 345 kV project relieve loading violations along the 230 kV system from Ellendale to Fergus Falls and from Big Stone to Hankinson. More specifically, the Project, in combination with the Big Stone South – Alexandria – Big Oaks 345 kV project, has been found to relieve 40 transmission elements with excessive thermal loadings for N-1 contingencies and 70 elements with excessive loading for N-1-1 contingencies.^{15,16} Additionally, the Project, along with the Big Stone South – Alexandria – Big Oaks 345 kV project, improves voltages in the Red River Valley by relieving 97 voltage violations for N-1 contingencies and 91 voltage violations for N-1-1 contingencies.¹⁷

Furthermore, the Project, along with the Big Stone South – Alexandria – Big Oaks 345 kV project, is essential to realizing the benefits delivered by the MISO LRTP Tranche 1 Portfolio. Notably, the Project and the Big Stone South – Alexandria – Big Oaks 345 kV project are the only two projects in the Tranche 1 portfolio that directly access the resource-rich areas of North Dakota and South Dakota. Without these two vital links to allow for the interconnection and delivery of low-cost energy resources, the LRTP Portfolio could not achieve its ability to enhance connectivity, maintain adequate reliability of the transmission system, and provide benefits in excess of its cost in the MISO Midwest subregion.¹⁸

¹³ The Big Oaks Substation was previously referred to as the Cassie’s Crossing Substation.

¹⁴ MTEP21 Report Addendum: Section 6, Page 23.

¹⁵ An “N-1-1 contingency” is an event that involves the initial loss of a single generator or transmission facility, followed by system adjustments, and then another loss of a single generator or transmission facility.

¹⁶ MTEP21 Report Addendum: Table 6-2, Page 25.

¹⁷ MTEP21 Report Addendum: Table 6-2, Page 25.

¹⁸ MTEP21 Report Addendum: Section 8, Pages 68-69.

From a regional perspective, the MISO LRTP Tranche 1 Portfolio as a whole, results in a benefit-to-cost ratio of between 2.8 and 4.0 for Midwest Cost Allocation Zone 1 which includes North Dakota, eastern Montana, northeastern South Dakota, most of Minnesota and western Wisconsin. Through the LRTP study, MISO quantified benefits on a portfolio wide basis comprised of the following components: (1) more reliable and resilient energy delivery; (2) congestion and fuel savings; (3) avoided resource and transmission investment; (4) improved distribution of renewable energy; and (5) reduced carbon emissions. Full details of these benefits are documented in the MISO MTEP21 Report Addendum.¹⁹

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¹⁹ MTEP21 Report Addendum: Section 7, Pages 47-68.

VIII. CONCLUSION

Public convenience and necessity will be served by the Applicants' construction, ownership, and operation of the Project. The Applicants are fit, willing, and able to construct, own, and operate their respective portions of the Project. Therefore, the Applicants request that the Commission:

1. Give Notice of Opportunity to request a hearing to interested parties establishing a twenty-day notice period, and, if no hearing is requested within twenty days, to waive the hearing in accordance with § 49-03-02, NDCC;
2. Enter an Order and issue a Certificate of Public Convenience and Necessity authorizing Otter Tail Power Company to construct, own, and operate the following components of the Project within the state of North Dakota: (1) Jamestown to Ellendale 345 kV Transmission Line; (2) Jamestown 345 kV Substation expansion; and (3) Maple River 345 kV Substation expansion;
3. Enter an Order and issue a Certificate of Public Convenience and Necessity authorizing Montana-Dakota Utilities Co. to construct, own, and operate the following components of the Project within the state of North Dakota: (1) Jamestown to Ellendale 345 kV Transmission Line; and (2) Ellendale 345 kV Substation expansion;
4. Grant such other relief as the Commission shall deem appropriate.

Dated this 29th day of February, 2024.

OTTER TAIL POWER COMPANY

/s/ MATTHEW J. OLSEN

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Phone (218) 739-8234

MONTANA-DAKOTA UTILITIES, CO.

/s/ TRAVIS JACOBSON

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Allison Waldon
Senior Attorney
MDU Resources Group, Inc.
1200 W. Century Avenue
Bismarck, ND 58503
Phone (701) 530-1089

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF NORTH DAKOTA**

In the Matter of the Joint Application of)
OTTER TAIL POWER COMPANY and)
MONTANA-DAKOTA UTILITIES CO. for)
a Certificate of Public Convenience and) Case No. PU-24-_____
Necessity for a 345 kV Transmission Line)
from Jamestown, North Dakota to Ellendale,)
North Dakota.)

AFFIDAVIT OF JASON J. WEIERS

STATE OF MINNESOTA)
) ss.
COUNTY OF OTTER TAIL)

Jason J. Weiers, being first duly sworn, on oath deposes and says that he is the Manager of Transmission Project Development for Otter Tail Power Company (“Otter Tail”), one of the two Applicants herein, and attests to the following:

1. That public convenience and necessity will be served by the Commission’s granting of the Joint Application of Otter Tail and Montana-Dakota Utilities Co. (“Montana-Dakota”) for a Certificate of Public Convenience and Necessity (“Application”) for construction, ownership and operation of an approximately 85-mile, double circuit 345 kilovolt (“kV”) electric transmission line from Otter Tail’s existing Jamestown Substation in Stutsman County to Montana-Dakota’s existing Ellendale Substation in Dickey County (“Transmission Line”) in addition to substation expansions at the Jamestown 345 kV Substation, Ellendale 345 kV Substation, Maple River 345 kV Substation, and the Twin Brooks 345 kV Substation (“Project”).
2. That the Project is part of the Midcontinent Independent System Operator, Inc.’s (“MISO”) Long-Range Transmission Planning (“LRTP”) Tranche 1 Portfolio which MISO, with the interaction and support of Otter Tail and other stakeholders, has shown will provide significant benefits to the Midwest subregion of MISO by enabling more reliable and affordable energy delivery.

3. That the Project is included in Appendix A of the MISO approved 2021 MISO Transmission Expansion Plan (“MTEP21”) Report.
4. That the Project is being developed collaboratively with MISO as a Multi-Value Project which will not provide direct retail service and will not interfere with the service provided by any utilities in the area.
5. With respect to the Transmission Line, Otter Tail intends to jointly construct, own, and operate the Transmission Line as tenants-in-common with Montana-Dakota, with each entity owning fifty percent of the new facility. The Transmission Line is planned to initially be constructed with one circuit. Subsequent notice will be provided to the Commission when the second circuit is planned to be installed. With respect to other North Dakota Project components specific to Otter Tail, Otter Tail also intends to construct, own, and operate the expansions at the Jamestown and Maple River 345 kV Substations.
6. The Transmission Line and other Project components that Otter Tail intends to construct, own and operate are accurately described in Section IV of the Application.
7. That Otter Tail is fit, willing, and able to construct, own, and operate the following components of the Project within the State of North Dakota: (1) Jamestown to Ellendale 345 kV Transmission Line; (2) Jamestown 345 kV Substation expansion; and the (3) Maple River 345 kV Substation expansion.
8. That it is in the public interest that Otter Tail be granted a Certificate of Public Convenience and Necessity as requested in the Application.

Dated this 29th day of February 2024.

Jason J. Weiers

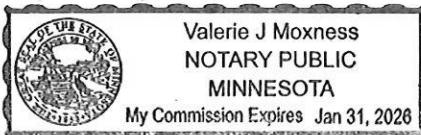
Jason J. Weiers
Manager, Transmission Project Development

Subscribed and sworn to before me this 29th day of February 2024.

Valerie J. Moxness

Valerie J. Moxness, Notary Public
My Commission Expires: January 31, 2026

(S E A L)



Of Counsel:

Robert M. Endris
Associate General Counsel
Otter Tail Power Company
215 South Cascade Street
P.O. Box 496
Fergus Falls, MN 56538-0496

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF NORTH DAKOTA**

In the Matter of the Joint Application of)
OTTER TAIL POWER COMPANY and)
MONTANA-DAKOTA UTILITIES CO. for)
a Certificate of Public Convenience and) Case No. PU-24-_____
Necessity for a 345 kV Transmission Line)
from Jamestown, North Dakota to Ellendale,)
North Dakota.)

AFFIDAVIT OF ROBERT R. FRANK

STATE OF NORTH DAKOTA)
) ss.
COUNTY OF BURLEIGH)

Robert R. Frank, being first duly sworn, on oath deposes and says that he is the Director of Electric Transmission Engineering for Montana-Dakota Utilities Co. (“Montana-Dakota”), one of the two Applicants herein, and attests to the following:

1. That public convenience and necessity will be served by the Commission’s granting of the Joint Application of Otter Tail Power Company (“Otter Tail”) and Montana-Dakota for a Certificate of Public Convenience and Necessity (“Application”) for construction, ownership and operation of an approximately 85-mile, double circuit 345 kilovolt (“kV”) electric transmission line from Otter Tail’s existing Jamestown Substation in Stutsman County to Montana-Dakota’s existing Ellendale Substation in Dickey County (“Transmission Line”) in addition to substation expansions at the Jamestown 345 kV Substation, Ellendale 345 kV Substation, Maple River 345 kV Substation, and the Twin Brooks 345 kV Substation (“Project”).
2. That the Project is part of the Midcontinent Independent System Operator, Inc.’s (“MISO”) Long-Range Transmission Planning (“LRTP”) Tranche 1 Portfolio which MISO, with the interaction and support of Montana-Dakota and other stakeholders, has shown will provide significant benefits to the Midwest subregion of MISO by enabling more reliable and affordable energy delivery.

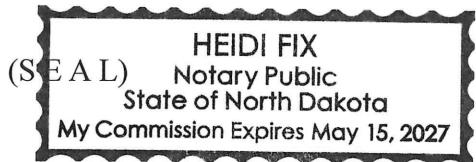
3. That the Project is included in Appendix A of the MISO approved 2021 MISO Transmission Expansion Plan (“MTEP21”) Report.
4. That the Project is being developed collaboratively with MISO as a Multi-Value Project which will not provide direct retail service and will not interfere with the service provided by any utilities in the area.
5. With respect to the Transmission Line, Montana-Dakota intends to jointly construct, own, and operate the Transmission Line as tenants-in-common with Otter Tail, with each entity owning fifty percent of the new facility. The Transmission Line is planned to initially be constructed with one circuit. Subsequent notice will be provided to the Commission when the second circuit is planned to be installed. With respect to other North Dakota Project components specific to Montana-Dakota, Montana-Dakota also intends to construct, own, and operate the expansion at the Ellendale 345 kV Substation.
6. The Transmission Line and other Project components of the Project that Montana-Dakota intends to construct, own and operate are accurately described in Section IV of the Application.
7. That Montana-Dakota is fit, willing, and able to construct, own, and operate the following components of the Project within the State of North Dakota: (1) Jamestown to Ellendale 345 kV Transmission Line; and (2) Ellendale 345 kV Substation expansion.
8. That it is in the public interest that Montana-Dakota be granted a Certificate of Public Convenience and Necessity as requested in the Application.

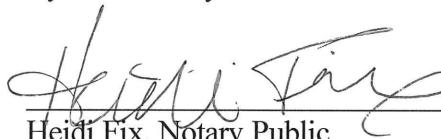
Dated this 29th day of February 2024.



Robert R. Frank
Director, Electric Transmission Engineering

Subscribed and sworn to before me this 29th day of February 2024.





Heidi Fix, Notary Public
My Commission Expires: May 15, 2027

Of Counsel:

Allison Waldon
Senior Attorney
MDU Resources Group, Inc.
1200 W. Century Avenue
Bismarck, ND 58503