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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 INFORMAL HEARING

July 8, 2024

APPEARANCES

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

OTTER TAIL POWER COMPANY:
Robert Endris, Jason Weiers, Todd Langston, JoAnn Thompson, Matthew Olsen

MONTANA-DAKOTA UTILITIES CO.:
Allison Waldon, Robert Frank, Travis Jacobson, Darcy Neigum, Mark Hanson

PUBLIC SERVICE COMMISSION:
Brian Johnson, Christopher Hanson, Adam Renfandt, Victor Schock, Claire Vigesaa

COMMISSIONER CHRISTMANN: Good afternoon. This is an informal hearing on a case that is a combinational case, Otter Tail Power and MDU, and it's a Certificate of Public Convenience and Necessity request regarding the Jamestown to Ellendale transmission line. It is Case No. PU-24-91.

It's August (sic) 8th, 2024, at 1:32 p.m. I'm Randy Christmann, chair of the Commission, joined by Commissioner Sheri Haugen-Hoffart here in the room with me and Commissioner Fedorchak is on the phone and, I believe, in transit.

I didn't have any opening comments.

Commissioner Haugen-Hoffart, did --

Well, Commissioner Fedorchak, did you have any opening comments?

COMMISSIONER FEDORCHAK: I don't, no. Thank you.

COMMISSIONER CHRISTMANN: Okay. So I'll save yours and combine.

I want to emphasize this is an informal hearing so it involves only undisputed facts. If there are any -- if anything comes up that is disputed, we will have to stop the informal and proceed to scheduling a formal case.

The Applicant goes first, but I will first turn

it over to Commissioner Haugen-Hoffart who is the portfolio holder for any opening comments and then we'll listen to the case.

COMMISSIONER HAUGEN-HOFFART: Okay. Well, thanks, everyone. I think this is going to be an interesting, like, overview and questions regarding a joint filing. So it's so good to see so many people here.

And because Julie is on the phone, before we turn it over to you guys to present, why don't we go around the room and introduce -- introduce everyone so Julie knows who's going to be presenting but who is also in the room.

So I'll go to Brian.

MR. JOHNSON: Brian Johnson, PSC staff.

MR. HANSON: Chris Hanson, PSC staff.

MR. FRANK: Robert Frank, Montana-Dakota.

MS. WALDON: Allison Waldon representing Montana-Dakota.

MR. WEIERS: Jason Weiers, Otter Tail Power Company.

MR. ENDRIS: Robert Endris, Otter Tail Power Company.

MR. LANGSTON: Todd Langston, Otter Tail Power Company.

COMMISSIONER HAUGEN-HOFFART: Do we want -- in the back.

COMMISSIONER CHRISTMANN: Yeah, please pass the mic back.

MS. THOMPSON: JoAnn Thompson, Otter Tail Power Company.

MR. OLSEN: Matt Olsen, Otter Tail Power Company.

MR. JACOBSON: Travis Jacobson, Montana-Dakota.

MR. NEIGUM: Darcy Neigum, Montana-Dakota.

MR. HANSON: Mark Hanson, Montana-Dakota.

MR. RENFANDT: Adam Renfandt, staff.

MR. SCHOCK: Victor Schock, PSC staff.

MR. VIGESAA: Claire Vigesaa, North Dakota Transmission Authority.

COMMISSIONER HAUGEN-HOFFART: Well, thank you everyone for the introductions.

My only question is, as you go through the PowerPoint, do you want us to ask questions at that time or do you want questions held until the end?

MR. WEIERS: Please interrupt with questions along the way.

COMMISSIONER HAUGEN-HOFFART: Okay. So we will turn it over to you guys for your presentation.

MR. WEIERS: All right.

MR. ENDRIS: Thank you, Commissioner. Robert Endris appearing on behalf of Otter Tail Power Company.

Today Jason Weiers will be our main presenter and main responder to questions, but, of course, we have the full Otter Tail and MDU compliment here to help with answers.

COMMISSIONER HAUGEN-HOFFART: Okay.

MR. WEIERS: All right. Well, good afternoon, everybody and thanks again for the opportunity to be here today to talk about Otter Tail and Montana-Dakota's joint petition for a Certificate of Public Convenience and Necessity for the Jamestown to Ellendale 345 kV project.

Today's presentation is going to start with a brief overview of the Applicants. We'll then cover the project description, the need for the project, benefits of the project, and the alternatives considered to the project. We will then explain how the project fits into MISO's Long-Range Transmission Plan and why it was classified as a Multi-Value Project. We'll next review the project schedule and wrap up with a review of the CPCN requirements in the North Dakota Century Code and our conclusions that support granting a Certificate of Public Convenience and Necessity for the JETx project.

So as mentioned earlier, the Applicants in this

case are Otter Tail Power Company and Montana-Dakota Utilities. Otter Tail and Montana-Dakota will co-own the Jamestown to Ellendale project.

As you look back on Otter Tail and Montana-Dakota's history, you'll note that we have over 200 years of a combined experience in serving customers in North Dakota. Over this time frame we've built an extensive network of transmission and generation facilities, and currently Otter Tail owns about 6,000 miles of transmission and about 1,100 megawatts of generation while Montana-Dakota Utilities owns about 3,400 miles of transmission and about 700 miles -- 700 megawatts of generation.

Otter Tail and Montana-Dakota have been long-standing business partners for many, many years, dating back to the 1970s when we first partnered in building the Big Stone Plant. In the 1980s, that partnership continued in partnering to build the Coyote Station. And most recently we partnered in building the Big Stone South to Ellendale 345 kV transmission project between 2011 and 2019. These past successes on these previous projects, along with our articles of incorporation and our continued certificates of good standing that are on file with the Commission, prove that we are fit, willing, and able to construct, own,

and operate the Jamestown to Ellendale project.

MISO approved the Jamestown to Ellendale 345 kV project with five distinct facilities. These five distinct facilities are shown here on the slide.

The first facility is the new 345 kV double circuit transmission line. The project is expected to be between 85 and 95 miles in length and traverse the counties of Stutsman County, LaMoure County, and Dickey County. The line will be co-owned between Otter Tail and Montana-Dakota Utilities.

The next facility approved by MISO was the Jamestown Substation expansion. This is needed to accommodate the new 345 kV line termination as well as an Ellendale Substation expansion that will be needed, again, to accommodate the new 345 line. The Jamestown Substation is currently owned and will continue to be solely owned by Otter Tail while the Ellendale Substation is currently owned and will continue to be solely owned by Montana-Dakota.

In addition to those core project components, there's also upgrades required at the Maple River Substation. This substation is located north of Fargo. And an expansion is needed there, as approved by MISO, to accommodate the replacement of two existing 345/230 kV transformers.

And, lastly, there's also a Twin Brooks Substation expansion that's been approved by MISO as part of the project. This is located down in South Dakota just west of Big Stone. And we'll be expanding this substation to accommodate new 345 kV reactors.

The Maple River Substation is currently solely owned by Otter Tail and the Twin Brooks Substation is jointly owned by Otter Tail and Montana-Dakota Utilities.

The anticipated structures for the project will look very similar to the picture you see on this particular slide and they will be constructed with steel monopole, self-supporting structures. They will be double circuit capable structures and we will be installing one circuit initially, but we'll have space for that second circuit in the future when the need arises.

COMMISSIONER CHRISTMANN: When you talk about joint ownership of the transmission line part, is it equal or is it a percentage one and a percentage the other?

MR. WEIERS: Equal ownership rights so 50 percent ownership rights. Yep.

COMMISSIONER HAUGEN-HOFFART: I mean, while we're on the joint ownership, so if something goes down,

is there, like, a primary contact, secondary contact? I mean, how does that work as far as doing the expansion work, recovery, whatever?

MR. WEIERS: Very good question, Commissioner.

We do have a series of agreements that we have executed and are continuing to work on that will actually designate the lead responder in the case of a maintenance need. So those arrangements will be memorialized and documented as part of the ownership arrangements between Otter Tail and MDU.

COMMISSIONER HAUGEN-HOFFART: Okay.

MR. WEIERS: Yep.

COMMISSIONER HAUGEN-HOFFART: So from the onset of doing the expansion work all the way through on maintaining it?

MR. WEIERS: Correct, yep.

COMMISSIONER HAUGEN-HOFFART: Okay.

MR. WEIERS: Yep.

Just continuing down this slide here, the average structure heighth is expected to be 150 feet tall and the structures will be installed on concrete foundations with between four to six structures per mile.

The estimated cost for the overall project is $440 million as we've included in our application.

The need for the project is driven by reliability concerns that are existing on the 230 kV system in southeastern North Dakota, eastern South Dakota, and west-central Minnesota.

I've included a graphic here that shows the existing transmission facilities in this part of the region.

The existing 230 kV system from Ellendale all the way over to Wahpeton plays an important part today in exporting generation from North Dakota. Today what happens on the system is an outage of the Big Stone South to Ellendale 345 kV line results in excessive loadings on the existing 230 kV line. This excessive loading also leads to some voltage depressions.

After completion of the new 345 kV line from Jamestown to Ellendale, the generation that is forced to flow in that 230 kV system during that Big Stone South to Ellendale outage will now have an alternative path to head north from Ellendale up to Jamestown where it can then jump on the existing 345 kV facilities and make its way towards Fargo.

The green dots and the green lines on this map actually represent the facilities that no longer have excessive loadings after we complete the Jamestown to Ellendale project as identified in the studies that have

been completed by MISO.

And I did get this real handy-dandy laser pointer so I could actually show that on the map if I had been thinking ahead of time, but I can -- I can certainly show it now.

So the Big Stone South to Ellendale project is this gray line through this part of the system here. And then the existing 230 kV system is here from Ellendale heading east to Forman or to Hankinson and then up to Wahpeton.

So as I was mentioning earlier, in today's system a loss of the Big Stone South to Ellendale 345 kV line forces the generation coming from North Dakota to have to go down the 230 kV system which is constrained today. As we look at the future condition of the system and the addition of Jamestown to Ellendale, an outage of Big Stone South to Ellendale will now allow for an alternative transmission path for the generation to flow from Ellendale up to Jamestown where it will then be able to jump onto the 345 kV line from Jamestown towards Fargo and make its way to the rest of the region.

COMMISSIONER CHRISTMANN: I just want to repeat that back --

MR. WEIERS: Okay.

COMMISSIONER CHRISTMANN: -- to make sure I

understand what we're trying to fix. It's the worry that the Ellendale to Big Stone goes down --

MR. WEIERS: Yep.

COMMISSIONER CHRISTMANN: -- forcing everything to go from Ellendale to Hankinson?

MR. WEIERS: On the existing 230 kV system, correct.

COMMISSIONER CHRISTMANN: That's inadequate?

MR. WEIERS: Yeah.

COMMISSIONER CHRISTMANN: And so now if this were constructed, if that Big Stone to Ellendale goes down, it can divert up to Jamestown and go east?

MR. WEIERS: Correct, yeah.

COMMISSIONER HAUGEN-HOFFART: And there's plenty of capacity from Jamestown to Fargo to take that on?

MR. WEIERS: Yeah. So MISO is studying the system out in 2030. And as they've done the contingency analysis looking at the various combination of outages that are possible, there were no additional overloads identified as you go from Jamestown towards Fargo. That's correct.

COMMISSIONER CHRISTMANN: What is the flow of most of the energy? You know, when we say Big Stone to Ellendale, I think of energy that is being created at the Big Stone Plant and coming north. But when you were

talking, you said the energy produced in North Dakota that's flowing down to Ellendale.

MR. WEIERS: Yep.

COMMISSIONER CHRISTMANN: And so which is the predominant --

MR. WEIERS: That's a great question, Commissioner.

COMMISSIONER CHRISTMANN: -- of energy that we're dealing with here?

MR. WEIERS: Yep, great question, Commissioner Christmann.

Most times during the course of the year as you look at the generation patterns on the system, there is a predominant flow of energy in this region from west to east. So we are seeing flows from Ellendale to Big Stone South most of the year. And this is especially predominant when we have the off -- off-peak or light-load conditions, where we have high generation and low load, we see the bias of flow in the system from west to east, most of the time from Ellendale to Big Stone South.

COMMISSIONER CHRISTMANN: And so when we always refer to it out of habit as Big Stone to Ellendale, it's really more the other way around?

MR. WEIERS: Yeah. And the line can flow either

way as an AC transmission line but, generally speaking, the historical flows have been from Ellendale to Big Stone South, yeah.

COMMISSIONER CHRISTMANN: Okay.

MR. WEIERS: All right. The Jamestown to Ellendale project will bring several benefits to the local and regional area as we think about adding a new transmission line like this.

We've already talked about the enhanced reliability that the project will bring to the -- to the area. Through the course of the MISO analysis, they've identified that this project will relieve excessive loadings on 70 transmission facilities and address 97 voltage violations as they've done their contingency analysis of this future condition.

COMMISSIONER HAUGEN-HOFFART: Repeat that again.

MR. WEIERS: The analysis performed by MISO, looking at the various contingencies on the system, has identified that this project will help relieve excessive loadings on 70 different transmission elements and address 97 voltage violations in those future, out-year conditions.

The project will also increase transmission capacity that will have the ability to enable new commercial and industrial loads.

And when you think about a 345 kV line of this magnitude, we're talking about load additions that are possible in the magnitude of what we've already seen happening out in this area. As folks are aware, Applied Digital has added some load at Jamestown and Ellendale. A project like this is going to help serve that load and also result in the ability to add more larger-scale loads like that, not only at the end points but also anywhere along the line through the course of a future interconnection.

COMMISSIONER CHRISTMANN: I just got to go back to what I was talking about before with the Ellendale to Big Stone flow. So really this is more about Ellendale to Jamestown than it is Jamestown to Ellendale.

MR. WEIERS: Yeah.

COMMISSIONER CHRISTMANN: But we need the vowel in the middle for the really cool acronym; right?

(Laughter)

COMMISSIONER CHRISTMANN: But the flow will generally be when it's needed going north?

MR. WEIERS: That's my -- that's my understanding. As you look at the system as an integrated system, interconnected on all those different places, really the Jamestown to Ellendale line will provide relief on that existing 230 system for an outage

of the Big Stone South to Ellendale line.

COMMISSIONER CHRISTMANN: Okay.

MR. WEIERS: Yep, yep.

COMMISSIONER CHRISTMANN: Thank you.

MR. WEIERS: All right. The JETx project will also accommodate new generation in North Dakota. I'll just mention as a part of MISO's studies of these future conditions, they added about 4,500 megawatts of new generation in North Dakota, and this line will help accommodate that future generation development.

It's also going to help reduce transmission congestion. That's going to help allow existing North Dakota generation to operate more often to get their product to the market.

In addition, the project will also increase resilience to extreme weather events. I believe Otter Tail was in front of the Commission in the past talking about the 2023 Christmas ice storm and the conditions that we experienced out at Jamestown. We had a situation this past Christmas season where we had lost both 345 kV lines into the Jamestown load pocket, and that forced us to have to operate the Jamestown pocket as an island for the matter of about one and a half days. We supported that entire load pocket through the use of our existing peaking plants that run off diesel

fuel.

As we look at adding the Jamestown to Ellendale project, we'll now have a third source into the Jamestown load pocket and this will help reliably support that load in the event that we lose both of those 345 kV lines into Jamestown again. So tremendous reliability benefits for the Jamestown area.

As we look at the southern end of this project at Ellendale, there's also going to be benefits to that area as we think about the current line from Big Stone South to Ellendale really ends at Ellendale as a 345 kV line. Connecting Jamestown down to Ellendale will now create a looped 345 kV system and help address some of those voltage stability concerns that are present today at Ellendale.

COMMISSIONER CHRISTMANN: What are the two 345 lines that are currently going into Jamestown?

MR. WEIERS: There's two lines today. One comes from Center and goes over to Jamestown and then it continues east to Buffalo, North Dakota, and then ultimately over to Bison Substation and then Maple River, which is just outside of Fargo.

COMMISSIONER CHRISTMANN: Okay.

MR. WEIERS: Yep. All right.

Going down the benefits here, the next benefit

is support to local landowners. As we think about boosting the local economy, Otter Tail and Montana-Dakota Utilities estimate that we'll be paying over $10 million to local landowners in this area as a result of the easement payments that we'll be paying for the project. It's also going to generate tax revenues for many of those governmental entities that support -- or that collect taxes, primarily in the form of property taxes.

And also, as you think about the work needed to construct a project of this magnitude, we'll also be looking to lever some of the local service providers in the area. It could be tree-clearing companies. It could be local contractors to help with road improvements; collecting or, you know, getting gravel, getting aggregate concrete. Those are all things that we hope to be able to leverage the local businesses for.

And, lastly, as you think about the workforce needed to build a project like this, many of the local businesses will also benefit by purchasing fuel, meals, and lodging during the construction phase of the project.

Speaking of construction, we do expect between 100 and 150 employees on-site during the construction phase of the project, and we're hoping to be able to

leverage some of the local skilled laborers for performing some of this work.

COMMISSIONER CHRISTMANN: Regarding the landowner payments, have you started easement acquisition yet and how enthusiastic have the landowners been to have that opportunity?

MR. WEIERS: We have started land acquisition efforts. Last August we started asking for survey permission along a proposed route, and then in February of this year we started asking for options to get easements on property.

Through the course of this interaction, we've actually been taking landowner feedback in the form of suggested revisions to our route, and at this point in time we've looked at over 30 different reroutes for the line. And negotiations with landowners continue to go well. As of last week, we reached about a 33 percent volunteer easement status. And we're continuing to work on that and will continue to work on that throughout the development phase of the project.

COMMISSIONER HAUGEN-HOFFART: You said you've looked at -- I don't remember how many reroutes. Have you rerouted it or are you looking at it? I'm just curious on that.

MR. WEIERS: So over the course of landowner

discussions, oftentimes we hear alternative ideas on where to reroute the transmission line. So to date I would say that we've experienced -- or we've processed over 30 different reroute requests from landowners.

(Commissioner Fedorchak enters room.)

MR. WEIERS: So of the over 30 reroute requests we've gotten from landowners, I don't have an exact number on how many we were able to grant, but it has been most of them.

And I don't know if anybody else has any additional color on that on the project team, but I'll open it up if there's any additional feedback.

UNIDENTIFIED SPEAKER: Yes. We continue to -- as we engage with landowners, we continue to see more and more reroutes, but they're small reroutes, primarily on their property. They just want it moved to one side or the other.

COMMISSIONER HAUGEN-HOFFART: Sure.

COMMISSIONER CHRISTMANN: And when you said "about 33 percent of easements acquired," are you talking about the number of landowners that would need to be dealt with or about the linear miles of the line?

MR. WEIERS: It's based on the number of landowners. At this point we have about 170 unique landowners along the proposed route, and we've acquired

about 33 percent of the easements that we need for the line so far.

COMMISSIONER FEDORCHAK: I have a question about the voltage and the voltage violations that you talked about a little bit ago. Could you give me those numbers again, Jason, and then kind of explain, give us some examples of what's happening there? I think you called it loading and voltage violation?

MR. WEIERS: Yep. Sure. Commissioner Fedorchak, if you don't mind, I'll maybe go back to this previous slide --

COMMISSIONER FEDORCHAK: Sure.

MR. WEIERS: -- so I can use the map to explain this in a little more detail.

So each transmission facility has a rating associated with it, and that rating is set by the owner to avoid any damage to the facility and to avoid any safety concerns. And as you think about excessive loadings on the transmission system, this is a condition where the loading on the facility has exceeded the safe operating limit of the line. So in those situations, the market may have to redispatch to avoid that overload issue or may have to pursue underlying upgrades to fix those loading issues.

And on the map again, just to illustrate this,

it's this 230 kV path from Ellendale to Forman to Hankinson up to Wahpeton that's experiencing some excessive loadings and then also from Hankinson as we head down towards Big Stone. You'll see this is a -- the system that's exporting this generation from North Dakota to the neighboring states.

So as we look at the addition of the Jamestown to Ellendale 345 kV project, we have found that the additional line will relieve excessive loadings on 70 different transmission elements during this contingency analysis performed for that future condition.

COMMISSIONER FEDORCHAK: And is that, like, how often? Is it a constant thing or, like, how often are these excessive loadings happening?

MR. WEIERS: I don't have an exact count of how many hours per year, but, generally speaking, these are typically times of the year when we're seeing a large amount of generation and lower amounts of load so we have higher flows throughout the system. We also see some of these same challenges during winter peak conditions when the load in this area is higher than it is in the summer.

COMMISSIONER FEDORCHAK: Okay.

MR. WEIERS: And if I may, Commissioner Fedorchak, just one other quick comment on these

excessive loadings.

Along with excessive loadings comes depressed voltages. What you'll see on these transmission facilities is the higher you load them, the lower the voltages will be on the system. So, generally speaking, we're going to see excessive loadings and depressed voltages accompany one another in these same areas, and that's exactly what's happening here. As this 230 kV system is loading up to its maximum rating, the voltages are dipping to a point where it's violating the criteria set by the owner and we need to do something to fix those issues.

COMMISSIONER FEDORCHAK: So when it's -- when the demand is lower than the generation, which you said is one of the drivers, is there demand out of the state that wants that power? Or what's stopping it from just being curtailed and how will that -- I guess if there's a demand, how will more transmission help if there's no demand, or maybe the demand is just out, someplace else? So explain that.

MR. WEIERS: Sure. This would all be basically determined through MISO's dispatch in the energy market. And to the extent that there is demand outside of the state, the MISO Market Dispatch would try to get that generation out of North Dakota and to those neighboring

states as long as we had sufficient transmission capacity available to export that generation. To the extent that that transmission capacity is constrained, then they'd have to curtail generation so that it would be bottled up within North Dakota.

COMMISSIONER FEDORCHAK: So is what's happening now is there's this constraint so it can't get out, there's demand outside but it's constrained or -- I'm a little confused by your comment that one of the cause of the voltage violations is it occurs at a time when there's low demand and excessive generation.

MR. WEIERS: Yep. Yeah. And that's a situation where the flow on the transmission system is at its maximum rating so that -- that we can't get any more generation out of -- out of the state in those situations.

COMMISSIONER FEDORCHAK: But it's wanted outside of the state. Somebody wants it. It just can't get there.

MR. WEIERS: Correct.

COMMISSIONER FEDORCHAK: Okay.

MR. WEIERS: Yep.

COMMISSIONER FEDORCHAK: So the demand just isn't local.

MR. WEIERS: Correct.

COMMISSIONER FEDORCHAK: Got it. All right. That makes more sense now. Thank you.

COMMISSIONER CHRISTMANN: But what about when it's not wanted? Then by doing this, we've just added more generation into the mix that has to curtail; correct?

MR. WEIERS: Can you repeat that, please?

COMMISSIONER CHRISTMANN: Okay. You seem to be alluding to times when the energy is needed somewhere and this would open more avenues to get it there. But what about the times in the middle of the night and the nice spring and autumn evenings when it's not needed anywhere and we're curtailing and curtailing? If you're right that this will add opportunities for more generation in North Dakota, doesn't it just mean more generation facilities that need to curtail and lose money?

MR. WEIERS: It's possible that could be a situation, but I'm assuming most generation developers would be doing their homework before they would be interconnecting with the grid to make sure that they have a viable business opportunity before proceeding.

COMMISSIONER CHRISTMANN: I -- I agree with that, the developers do, because they get subsidized. It's the existing ones that are left hanging out to do

the curtailing.

MR. WEIERS: Yeah. And that comes down to how they set their market prices as they enter the market and MISO chooses which resources to dispatch.

Okay. I think we're on slide 7.

So as MISO performed their studies of the area here, they did evaluate five different alternatives to determine if any feasible alternative was out there that more effectively addressed the reliability concerns that were appearing on that 230 kV system in southeastern North Dakota, northeastern South Dakota, and west-central Minnesota.

This particular slide has a table that shows all of the various combination alternatives that MISO considered. And as you'll notice, the list of alternatives here, you'll note that the Jamestown to Ellendale project is part of every different alternative that was tested by MISO, which further reinforces the importance and the benefits of the project to not only the region but also this local area.

The Jamestown to Ellendale project was identified as part of the Tranche 1 Portfolio for MISO's Long-Range Transmission Plan. This long-range transmission planning effort started back in 2020 and is planning to be broken into four different phases or four

different tranches of transmission projects.

As shown on the slide here, Tranches 1 and 2 are focused on the Midwest subregion of MISO while Tranche 3 will then turn its focus to MISO's South region, and then Tranche 4 will look at focusing on intraregional projects to help strengthen the connections between the Midwest subregion and the South subregion.

COMMISSIONER FEDORCHAK: It's really five tranches.

MR. WEIERS: Yeah. You consider Tranche 2.1 and 2.2 --

COMMISSIONER FEDORCHAK: I'm not buying the marketing. Sorry.

MR. WEIERS: Yeah. Understood.

COMMISSIONER CHRISTMANN: So do you mean there's a fifth one that's not mentioned here --

COMMISSIONER FEDORCHAK: No.

COMMISSIONER CHRISTMANN: -- or you mean 2.1 and 2.2 are two different tranches?

MR. WEIERS: Yes.

COMMISSIONER FEDORCHAK: Yeah. They really are.

COMMISSIONER CHRISTMANN: So you mentioned this one being $440 million. No. This project being $440 million. What was the total price tag of --

COMMISSIONER HAUGEN-HOFFART: Ten billion.

COMMISSIONER CHRISTMANN: -- Tranche 1? Ten?

MR. WEIERS: Yep. Ten point -- $10.3 billion was the approved cost of the Tranche 1 Portfolio.

COMMISSIONER CHRISTMANN: And go through 2, 3, and 4. You can divide 2 or put them together.

MR. WEIERS: Are you talking about the --

COMMISSIONER CHRISTMANN: Estimated costs.

MR. WEIERS: At this point in time the other tranches aren't known. They're not finalized yet so it's hard to put a price tag on them.

COMMISSIONER CHRISTMANN: Just estimates out there.

MR. WEIERS: Yeah, I -- I'm not comfortable stating a specific estimate because I don't believe that the portfolios are finalized yet.

COMMISSIONER FEDORCHAK: Tranche 2 is looking like -- if you combine them, 30 to 50 billion. Probably a lot closer to 50.

COMMISSIONER CHRISTMANN: For just --

COMMISSIONER FEDORCHAK: Because Tranche 1 -- 2.1 is almost 30. Actually, Tranche 2.1 is almost 30 billion.

Right, Adam? Yeah.

So they haven't really put a price tag on 2.2 that I've seen but --

COMMISSIONER CHRISTMANN: So 2.1 you said is about 30?

COMMISSIONER FEDORCHAK: Uh-huh.

COMMISSIONER CHRISTMANN: And 2.2?

COMMISSIONER FEDORCHAK: They haven't really said. And I don't know, what did -- is Tranche 3's at all -- price tag range?

UNIDENTIFIED SPEAKER: Just a range (inaudible).

COMMISSIONER FEDORCHAK: Yeah.

COMMISSIONER CHRISTMANN: Okay.

MR. WEIERS: Okay. Moving on to slide 9, again refocusing our discussion here on Tranche 1, MISO did take about two and a half years to perform the studies to support the Tranche 1 Portfolio through the course of several different stakeholder meetings and workshops. And as a result of all that study work, they did approve 18 new transmission projects in July of 2022, and they call that the Tranche 1 Portfolio.

As you'll notice on the map here, the Jamestown to Ellendale project is project number 1 on the map.

COMMISSIONER HAUGEN-HOFFART: I was just curious, how did you prioritize the difference between Tranche 1 to Tranche 4? What were the key components on that? I mean --

MR. WEIERS: Yeah.

COMMISSIONER HAUGEN-HOFFART: -- north versus south?

MR. WEIERS: Sure. Thanks, Commissioner, for the question.

The actual prioritization of looking at which parts of MISO was performed by MISO. And the reason that they focused on the Midwest subregion first is because they're seeing the amount of generation being built in this region is far outpacing what's happening in other parts of MISO. So they're attempting to try to get ahead of the transmission needs because of the faster development of generation up in this region.

COMMISSIONER HAUGEN-HOFFART: Getting it out more?

MR. WEIERS: Yeah.

COMMISSIONER HAUGEN-HOFFART: Okay.

MR. WEIERS: So as Commissioner Christmann had just asked about here, this slide actually indicates that Tranche 1 represents over 2,000 miles of new and upgraded high-voltage transmission. And the price tag that was associated with the Tranche 1 was $10.3 billion.

As you think about these Tranche 1 projects, they do offer multiple benefits. And because of those multiple benefits, all these projects as part of the

Tranche 1 Portfolio were approved as Multi-Value Projects, or MVPs, under MISO's tariff.

So under MISO's tariff, a transmission project can be approved as an MVP if it meets one of three criteria: It needs to address a reliability issue that's in violation of a NERC reliability standard; it needs to provide economic value across a broad area with a benefit-to-cost ratio of 1.0 or higher; or it needs to support the reliable and economic delivery of energy.

Because the benefits of the Tranche 1 Portfolio are spread broadly across the entire Midwest subregion, the cost of the Tranche 1 Portfolio is shared on a pro rata basis to all loads in that Midwest subregion based on energy usage. So what this means for Otter Tail's North Dakota customers is that they'll be paying for .61 percent of the projects and Montana-Dakota's North Dakota customers will be paying for about four -- 0.47 percent of the projects.

COMMISSIONER CHRISTMANN: So does the southern region pay anything for these?

MR. WEIERS: In this case, the benefits were limited to just the Midwest subregion. So that's the only load area that (indiscernible) allocated costs from the Tranche 1 Portfolio.

COMMISSIONER CHRISTMANN: And based on a couple

slides ago, Tranche 3 will be just about the opposite.

MR. WEIERS: Based on the focus for Tranche 3, we expect that the cost allocation would be limited to the MISO South subregion.

COMMISSIONER CHRISTMANN: What about that big Tranche 2? That's north?

MR. WEIERS: The intent is to focus on the Midwest subregion, yep.

COMMISSIONER CHRISTMANN: Okay.

MR. WEIERS: All right. The next slide has just an overview of the project schedule.

As I mentioned earlier, we started outreach to landowners back in 2023. We actually held some public meetings to get input on the routing process back in early to mid-2023 and then began defining a proposed route in late 2023.

And we started securing land rights for the route in early 2024; in February, in fact. We do plan to file a combined Certificate of Corridor Compatibility and Route Permit Application late in Q3 of this year.

And we're hoping for a PSC decision on the combined route permit filing in the early -- early in the second half of 2025.

Assuming all this goes as planned, we would plan to start pre-construction activities in the fall

of 2025. And some of those pre-construction activities would include tree clearing. We'd be working on laydown yards and getting road improvements ready to start construction in the spring of 2026.

We'd start first, of course, with foundation drilling, and then that would be followed up with setting structures, and then finally stringing conductor.

And as the current schedule stands, we would have two to two and a half years construction and wrap the project up and have it in service by the end of 2028.

All right. We have reviewed Chapter 49-03 of the North Dakota Century Code and believe that we are in compliance with the requirements needed to obtain a Certificate of Public Convenience and Necessity. As you review our application, you'll note that the Jamestown to Ellendale project will not interfere with the service provided by any of the other utilities in the area.

Otter Tail and Montana-Dakota have articles of incorporation on file with the Commission. And Otter Tail and MDU are committed to obtain all the applicable permits from federal, state, and local authorities prior to starting construction.

So, in conclusion, we believe that public

convenience and necessity will be served by Otter Tail and MDU's construction, ownership, and operation of the project because of the reliability and economic benefits provided to customers. The project is part of the MISO's long-range plan and was approved as part of their 2021 Transmission Expansion Plan because of the reliability and economic benefits that it enables as part of the overall Tranche 1 Portfolio.

And Otter Tail and MDU are fit, willing, and able to construct, own, and operate the Jamestown to Ellendale project as proven by their articles of incorporation, their certificates of good standing, and their success in past projects.

COMMISSIONER FEDORCHAK: Jason, did you -- was this project a standalone on the cost-benefit analysis or did it -- I forget how it works. Was it all the MVPs were done together?

MR. WEIERS: That's -- the latter is correct, Commissioner Fedorchak. All MVPs were done together.

COMMISSIONER FEDORCHAK: Okay. Have you guys done a cost-benefit of just this project?

MR. WEIERS: We have not. In fact, Otter Tail doesn't have the necessary software to perform that calculation.

COMMISSIONER FEDORCHAK: Okay. And the benefits

that you mentioned in your discussion about benefits including, like, landowner payments and tax -- tax revenue, etcetera, those aren't part of the MISO business case, are they?

MR. WEIERS: They are not actually --

COMMISSIONER FEDORCHAK: Okay.

MR. WEIERS: -- part of the MISO business case.

I will mention to the commissioners here today that Otter Tail and Montana-Dakota have commissioned a study with North Dakota State University to help better quantify the benefits of the project to the local area, and we do include -- we do plan to include that study as part of our upcoming combined Certificate of Corridor Compatibility and Route Permit Application. So the Commission will get a chance to see that coming up as we finalize that and better quantify those local benefits.

COMMISSIONER HAUGEN-HOFFART: Who's doing that study?

MR. WEIERS: We've commissioned North Dakota State University, NDSU.

COMMISSIONER FEDORCHAK: You mentioned that this will accommodate 4,500 megawatts of new generation. Do you know where MISO got that figure? Or did you guys give that to them? Where's that come from? And is that generation in the queue? You know, how do we -- do we

have confidence that that's actually probably going to materialize?

MR. WEIERS: The 4,500 megawatts was determined through MISO's stakeholder process when they built the futures to analyze as part of the other TP study. And it's my understanding that the 4,500-megawatt assumption of generation in North Dakota was based on a variety of inputs including stakeholder input from utility integrative resource plans. If there was an announced project, they made sure they included that in their assumptions. And then they also did look at the queue and they tried to determine where there's been recent activity and used some of those locations as well for the future generation siting assumptions.

COMMISSIONER FEDORCHAK: Okay.

And then you probably covered this and I missed it, but the O&M for this line, how is that handled in terms of covering the cost?

MR. WEIERS: Yeah. The -- the O&M costs for the MVP projects are recovered as part of the overall MISO tariff.

COMMISSIONER FEDORCHAK: Okay.

MR. WEIERS: So we will calculate O&M charges and pass those through as MVP charges under Attachment MM of Otter Tail and Montana-Dakota's respective

attachments in MISO.

COMMISSIONER FEDORCHAK: Okay. So is it safe to, kind of just in a simple manner, assume that this is a decently-size investment in both your systems that you'll pay only a fraction of the cost for it?

MR. WEIERS: Yeah, that's correct, Commissioner Fedorchak. The calculations that have been performed by Otter Tail and Montana-Dakota Utilities indicate that North Dakota customers will be paying, roughly, .61 percent -- I'm sorry, let me back up a minute there. Otter Tail's North Dakota customers will be paying .61 percent of this project cost and Montana-Dakota customers in North Dakota will be paying 0.47 percent of the overall project cost.

COMMISSIONER FEDORCHAK: Okay.

COMMISSIONER HAUGEN-HOFFART: But what's the impact to the maintenance of it? How does that affect the -- you know, the ongoing costs? Because you have -- maintain a hundred percent ownership on one and joint, but that's got to be some ongoing costs and which repairs will pay for.

MR. WEIERS: The MVP costs for O&M are treated the very same way they are for the investment needed to get the projects constructed. So if it's a capital cost upfront for part of the construction costs or an O&M

cost after the project goes in service, those costs are allocated similarly across the MISO Midwest subregion.

COMMISSIONER HAUGEN-HOFFART: Okay.

COMMISSIONER CHRISTMANN: I want to go back to that allocation. It's one thing to talk about that on $440 million. And it was wonderful because we're only paying this small part of the costs of this. But this is the thing with socialization. In agreeing to that, we're paying that same part of the costs of the other more than $9 and a half billion involved here and the 30 billion on Tranche 2 and all of that; correct?

MR. WEIERS: That's correct, Commissioner Christmann.

COMMISSIONER CHRISTMANN: So what's the rate impact? In rate cases, we often talk about typical residential customers as an example so that the people that you serve and that we serve understand how they're going to be impacted. What is the impact of this project or Tranche 1 for each company?

UNIDENTIFIED SPEAKER: You got number two?

MR. WEIERS: Okay. So Otter Tail and Montana-Dakota Utilities has performed calculations to determine the rate impact to an average North Dakota residential customer using a thousand kilowatt-hours per month. And as you look at the cost of just the

Jamestown to Ellendale project, Otter Tail residential customers are going to see a rate impact of 18 cents per month, MDU customers will see an impact of 12 cents per month for just the Jamestown to Ellendale project.

COMMISSIONER CHRISTMANN: Doesn't really --

MR. WEIERS: Yeah.

COMMISSIONER CHRISTMANN: Doesn't really interest me because we're talking about a package deal.

MR. WEIERS: So I have those numbers handy here as well.

As you look at Otter Tail's impact for North Dakota customers from the full Tranche 1 Portfolio, again, an average residential customer for Otter Tail using a thousand KW-hours per month, the rate impact is estimated to be $5.85 per month.

UNIDENTIFIED SPEAKER: Montana-Dakota's additional cost for the entire Tranche 1 would be about $3.15 a month.

MR. HANSON: Would it be safe to say that if you're considering that's about, roughly, $10 billion, we're talking another 30 to 40 billion. So if you take that number times four and add to that, I mean, you get an idea of what the cost of Tranche 1, Tranche 2 would be. So it would be somewhere in the mid-30s per month probably per customer once Tranche 2 and 3 are through?

Is that fair to say?

MR. WEIERS: From a rate impact perspective, I think that's a fair statement. I just don't want people to lose sight of the benefits that these projects also offer to the local area and the region in general.

So, yeah, if you look at it just purely on a rate impact basis, that's a reasonable assumption, Chris, but we also need to look at the full package and there are other benefits these future projects will bring to the region and the local area.

COMMISSIONER CHRISTMANN: So when we do that, I completely understand the impact to government with taxes collected. I can completely understand the benefits to potential -- potential new energy generation that is looking all over the country for places to get in on a transmission system to take advantage of federal subsidies. So I see that as a benefit to them.

I'm wondering about the benefit to Otter Tail and especially to MDU. We talk about the occasional inability to get their power out. Tells me that we have plenty to serve our people. And so we're entering into these compacts for all these socialized projects at a great cost to the system that benefits government and renewable generators, but I'm not getting quite the enormous benefits to the customers of these two

companies.

And I'll just add this to the question because I'd like both companies' responses. I sort of get Otter Tail's because I understand the push from Minnesota to stop using the Coyote Plant power and have all renewal, renewable. I don't really see the pressure on MDU.

MR. WEIERS: Thanks, Commissioner Christmann.

If I could maybe start from Otter Tail's perspective and then I'll hand it over to MDU to respond on their behalf.

As you look at the Jamestown to Ellendale project, one of the huge benefits for Otter Tail, as I mentioned earlier, is the benefits that we're going to see in the local Jamestown area. As you think about the current load pocket and the existing sources into that load pocket, we were in a very difficult position last Christmas with the ice storm that took down both 345 kV lines that serve Jamestown. As a result, we had to run that diesel peaking generation for almost one and a half days that consumed nearly 90,000 gallons of diesel fuel.

If we add this new source from Ellendale up to Jamestown, this additional 345 delivery will result in a very much more -- or a much more resilient and robust transmission system that can serve that Jamestown load pocket, which, by the way, is Otter Tail's largest

community as you think about our service territory across our entire 70,000-square-mile service territory.

So we see tremendous benefits of this project. And over time we knew something was going to be needed to be done to that Jamestown load pocket. This project is going to be a huge benefit because of the fact that we can share the cost of the project with all of the MISO Midwest customers and get the huge benefit to our customers in the Jamestown area, and anywhere along the line as we look to Otter Tail communities even down as far south as Edgeley.

COMMISSIONER CHRISTMANN: Does that happen very often where both those 345 lines were out?

MR. WEIERS: I'll mention that because both -- last Christmas was certainly a unique situation with an extreme weather event. But I will also mention that even when it comes to performing maintenance at the substation, when we have the entire load pocket sourced from a single substation, we do get into some very difficult situations when we try to schedule outages and be ready to survive that next contingency so we don't have a contingency that takes down the entire load pocket. So now this third source will also help ease some flexibility and be -- and being able to perform maintenance more often during the year.

COMMISSIONER CHRISTMANN: And was that always an issue on maintenance or is that just since the addition of the data processing center at Jamestown?

MR. WEIERS: It certainly has gotten more challenging as we've experienced load growth in the area. Even before the addition of the Applied Digital load, we did see some of the residential loads and commercial loads around the Jamestown loop increase over time.

As you think about the Spiritwood Energy Park, there's a lot of activity going on there with the soybean facility going on. We have Aviko Cavendish, a lot of those commercial customers in that area.

And at some point we have reached a load level where the local peaking generation can no longer reliably serve all of that load during certain times of the year. So it's become even more important now to have that third delivery into Jamestown to help serve that area when we have an outage to the existing facilities.

MR. SCHOCK: When both of those 345 lines went down coming into Jamestown, where did they fail at? Was it in that local area or was it somewhere else?

MR. WEIERS: I don't know the exact answer to that. It was outside of the Jamestown Substation.

Actually, Todd, do you have any --

MR. LANGSTON: I know the line between Jamestown and Buffalo failed east of Spiritwood. I'm not sure where the line failed from Jamestown to Center.

MR. SCHOCK: And both failures were directly related to the ice storm?

MR. LANGSTON: Yes.

MR. SCHOCK: Okay. How is this line resistant to ice storms and failure like the other two lines?

MR. LANGSTON: The conductor on this proposed line, JETx line, is going to be T-2. That -- that type of wire, it's a twisted pair, sheds ice. Ice does not form on there and get the galloping that a normal conductor would.

MR. SCHOCK: Okay. Thank you.

COMMISSIONER CHRISTMANN: Before we go to any more, I'd like to get MDU's perspective on the -- unless you had a question and follow-up of Otter Tail's perspective.

COMMISSIONER FEDORCHAK: I don't. I just have some commentary on --

COMMISSIONER CHRISTMANN: Okay.

COMMISSIONER FEDORCHAK: -- Tranche 1 and Tranche 2.

COMMISSIONER CHRISTMANN: This was sort of a

double question. I'd like to get MDU's response.

MR. FRANK: Yeah, I think I'll start and then Darcy probably has some comments to add as well for Montana-Dakota.

There's some -- we definitely see some reliability benefits as well from this increased transmission in the area. I think there's also some opportunities for us from a load-serving perspective as well because we've seen some interest in the area where our transmission has been growing like Ellendale where we can realize some -- some benefits as a company and customers in North Dakota for these increased load opportunities that we have to serve, like data centers.

And I think that Jamestown to Ellendale also gives us an opportunity to increase the transmission investment in North Dakota and allow a maybe future expansion of MISO's transmission system further west more into our system. And I think Jamestown to Ellendale gives -- Jamestown to Ellendale line gives us that opportunity to continue that transmission further west into -- more into MDU's system, I think, in the future.

MR. NEIGUM: I would agree with what Rob says.

And the other one that we're looking at too is this looking for a need for additional generation to

come into the state, whether it's for ourselves or other developers. So, you know, without projects like this, it's hard to develop additional generation within the state. And so it does provide those opportunities as well. You know, one, for our own utilities to be able to supply the needs for our customers and also at least for additional development to happen in the state that otherwise wouldn't happen.

COMMISSIONER CHRISTMANN: Thank you.

COMMISSIONER FEDORCHAK: So kind of stepping off of those comments, when Tranche 1 was being discussed and the cost allocation -- this is more background for my colleagues -- when the cost allocation was being discussed, our office and Darcy, so MDU, tried really hard to get a generator-pays component to the formula. I mean, we took many, many runs at it and were starting to get some traction. And then people got nervous that we're taking too long and had to get going and, you know, it takes so long to build, etcetera, etcetera, so they move forward with this postage stamp approach.

And so we ultimately went along with it for the reasons, you know, both the reliability reasons and recognizing, like, North Dakota is an exporting state and we have potential to export more both from the gas side, gas generator side, perhaps through coal with

carbon capture and storage if -- if that's proven out, or if the science changes, you know, there might be more hope for the -- our coal fleet and through wind -- you know, wind and renewables. So this Tranche 1 seemed like much more of backbone-type investments to bring this system up to speed.

I will say Tranche 2 is much more about helping the states -- and they even state this, MISO even states this -- Tranche 2 is much more about helping the states meet their goals.

So in my opinion, I don't think that -- and I'm not prepared to just have North Dakota, as long as I'm here, go along with Tranche 2 depending on how it all shakes out, but I mean that's -- that's a play that we need to be looking at down the road, but there should be a generator-pays component to that and there isn't. And they fought it tooth and nail.

And the benefits to our state of that, especially 2.1 where we basically aren't even connected and they've left MDU high and dry in that there's no investments -- they don't even have in this system west of Jamestown on the map on their Tranche 2 stuff.

So that one is an area where North Dakota needs to be very engaged in watching how the costs come forward and how those -- what the benefits are of those

projects, how they address the cost-benefit analysis and -- and be prepared to not go along with it.

Anyway, commentary, not for today's case.

COMMISSIONER HAUGEN-HOFFART: So there's a lot of flexibility on the difference between the different tranches and the cost allocation or is it --

COMMISSIONER FEDORCHAK: No, no.

COMMISSIONER HAUGEN-HOFFART: -- are you saying we did this for 1, it's got to be this way for 2, 3, 4, whatever?

COMMISSIONER FEDORCHAK: There's no flexibility. The cost allocation is set and it would have to be fought at FERC if we wanted to not go along with it.

COMMISSIONER HAUGEN-HOFFART: Okay.

UNIDENTIFIED SPEAKER: A quick question on cost. You know, I don't think I'd be the only one who was a little shocked by the cost of the project. I would imagine you guys were probably maybe not surprised by it. But looking back at the cost of industrial materials and things like that, you'd be at like 85 miles, and when you do the breakdown between the substations and the lines, you've got somewhere in the ballpark of $4 million a mile for four structures per mile.

I mean, how does that compare to more recent

projects that you guys have done and what kind of an inflation? Is it twice the cost of what you did ten years ago? Any sense of that?

MR. WEIERS: Yes. It's basically doubled as what we had done on BSSE. BSSE, we hit the steel prices at an all-time low. Right now these steel prices, the indices are twice that what we had paid for BSSE. Along with concrete prices also.

UNIDENTIFIED SPEAKER: And what year was that?

MR. WEIERS: It was in service in 2019.

COMMISSIONER HAUGEN-HOFFART: Julie, you missed the brand?

COMMISSIONER FEDORCHAK: It's very intriguing.

COMMISSIONER HAUGEN-HOFFART: Otter Tail --

COMMISSIONER FEDORCHAK: JETx, is that how we say it? JETx? Good job.

COMMISSIONER CHRISTMANN: Are there other questions?

MR. SCHOCK: I thought I could just sit quietly back there and I can't. I tried.

Okay. So cost recovery of a line such as this. You wouldn't be coming in and asking for cost recovery in your transmission rider as rate base; correct? You would be coming in through a MISO charge in the transmission rider. Is that accurate?

UNIDENTIFIED SPEAKER: Different skills.

(Laughter)

MR. SCHOCK: Matt wanted to talk anyways.

MR. OLSEN: Yeah, thanks, Victor. Matt Olsen here.

Most of it. I think you're -- you're accurate about that. There's a small portion that's rate base.

MR. SCHOCK: Okay. So what portion would be rate base?

MR. OLSEN: The small portion that represents North Dakota customers of Otter Tail.

MR. SCHOCK: Okay. So this .6 -- .6 percent, roughly.

MR. OLSEN: Yeah.

MR. SCHOCK: That portion you would be adding to rate base and getting your North Dakota approved rate of return or your FERC approved rate of return?

MR. OLSEN: Yeah, this is where I probably need help from others. Probably may be better if we work this out in --

MR. SCHOCK: It's just curiosity.

MR. OLSEN: Yeah.

MR. SCHOCK: So you could file something just to kind of clarify those points of the cost recovery.

MR. OLSEN: And it may be there already, but we

can spell it out for you.

UNIDENTIFIED SPEAKER: Well, Matt, maybe speak to the FERC jurisdiction a little bit. I know MDU and Otter Tail have a little bit of a difference between -- you have a small jurisdictional portion but maybe -- I think -- and Victor can correct me if I'm wrong, but I had a misconception at first that this would be a rate base, rate recovery item.

And maybe kind of speak a little bit to the mechanism that -- how that gets recovered through -- or how that gets charged back to customers as opposed to being rate base with a recovery and base rates and how it flows from MISO instead.

MR. OLSEN: Yeah, I -- I think I'll probably add confusion by trying to explain it myself and I'd rather not introduce that here but certainly --

MR. SCHOCK: That's perfectly fine if you're willing to make a subsequent filing just to kind of lay out the cost recovery of what -- what I think would be interesting to demonstrate for -- for this project, for the Jamestown to Ellendale line and for the rest of Tranche 1, how that would pass through to North Dakota customers, because I would assume it's slightly different.

UNIDENTIFIED SPEAKER: And we do have some of

this in data requests so --

MR. OLSEN: Yeah.

UNIDENTIFIED SPEAKER: -- we can just do a little addendum.

MR. OLSEN: I think we'll point there and spell it out for you there.

MR. SCHOCK: Yeah. Okay. Sure.

COMMISSIONER FEDORCHAK: Would it be different for MDU or Otter Tail?

UNIDENTIFIED SPEAKER: Yes.

COMMISSIONER FEDORCHAK: Maybe --

UNIDENTIFIED SPEAKER: Next.

UNIDENTIFIED SPEAKER: Yes, it's different.

UNIDENTIFIED SPEAKER: Slightly. I do know that.

MR. JACOBSON: Travis Jacobson with MDU.

Montana-Dakota would only see in our transmission cost adjustment where we would see the Schedule 26, the MVP piece of that. And that would be the same for Montana-Dakota's JETx project as well as the rest of Tranche 2. That's just going to come through our Schedule 26-A, I think.

MR. SCHOCK: Okay. So -- so then that would be based upon your FERC approved rate of return?

MR. JACOBSON: That's true.

MR. SCHOCK: Okay. So there's other stuff in there other than rate of return but that's --

MR. JACOBSON: Same as BSSE and all the other --

MR. SCHOCK: Yep, yep.

MR. JACOBSON: -- ones today.

MR. SCHOCK: Absolutely.

MR. JACOBSON: That's true.

MR. SCHOCK: Yep. Okay.

MR. JACOBSON: And there is nothing that we would put in rate base at Montana-Dakota.

MR. SCHOCK: Okay. And then -- and that would flow through, you would be charged by the MISO 26?

MR. JACOBSON: I think it's 26-A.

MR. SCHOCK: For how many years?

MR. JACOBSON: Well, until it's gone. So 40.

MR. SCHOCK: 40? 40 years? Okay.

I think that's all I have. I can go down other rabbit holes, but that one seemed most fun.

COMMISSIONER FEDORCHAK: I'll be 95 when that's done.

COMMISSIONER HAUGEN-HOFFART: What's that?

COMMISSIONER FEDORCHAK: I'll be 95 years old when they quit paying for it.

(Laughter)

UNIDENTIFIED SPEAKER: I'll be pretty old too.

(Laughter)

UNIDENTIFIED SPEAKER: But the electrons will still be flowing.

COMMISSIONER CHRISTMANN: When it's windy.

Did that cover your questions?

So I don't know if this is more for staff or what, but we're discussing this with Otter Tail and MDU because you're owners of the line and (indiscernible) certificate, but this rate impact is going to go to Xcel customers too; right?

UNIDENTIFIED SPEAKER: Uh-huh.

COMMISSIONER CHRISTMANN: Do you know how much that is?

UNIDENTIFIED SPEAKER: I can speak to that since Alex -- I spoke to Alex Nisbet.

As far as the allocation of cost per megawatt-hour, it's exactly the same for all of the companies. The difference is, as you see the difference between MDU and Otter Tail's rate for residential customer, theirs is going to be in that ballpark of what they have -- he hasn't gotten back to me on the actual thing, but it has to go through the jurisdictional allocation and the -- and the -- you know, the customer -- or the class allocations to kind of get at the customer rate, but it's going to be in the same

ballpark. So the bottom line --

COMMISSIONER CHRISTMANN: The ballpark is so much different.

UNIDENTIFIED SPEAKER: Well, it -- it --

COMMISSIONER CHRISTMANN: A little over three to almost six.

UNIDENTIFIED SPEAKER: Yeah. And I've asked them to expand upon -- upon that, but the point that I'd make, though, is when you look at the allocation, the cost per megawatt-hour is essentially the same for -- for each company.

So if you think about it like a -- the way I looked at it on a short basis is, if you jump through all the math, is one customer uses about one megawatt-hour per month and the cost was like -- for Tranche 1 was like $2.51 in 2031 per month. So you think it would be 2.51, but it has to go through all the allocations. So it all kind of starts from the same place.

So I'm still waiting to get what that exact number will be, but they all start with the same charges from -- for the same amount of energy from -- from the MISO cross charges through the Transmission 26 or whatever you call it. So I'm waiting to hear what that number is exactly.

COMMISSIONER CHRISTMANN: And the cooperatives are also going to be paying on this.

UNIDENTIFIED SPEAKER: Well, if they're on --

MR. SCHOCK: MISO --

COMMISSIONER FEDORCHAK: MISO co-ops.

UNIDENTIFIED SPEAKER: Yeah, right.

COMMISSIONER FEDORCHAK: Which is Minco -- Minnkota. No, they have their own deal, don't they? Yeah, they're not members. They got some other tariff.

UNIDENTIFIED SPEAKER: But an answer will get -- as soon as Alex gets back to -- I'll get you that information.

COMMISSIONER FEDORCHAK: Is Cass -- Cass County -- no. They're SPP. All right.

COMMISSIONER CHRISTMANN: Okay. Anything else?

COMMISSIONER FEDORCHAK: I don't think so.

COMMISSIONER CHRISTMANN: Well, we'll just say I'm going to continue a lot of discussions with staff. Like I said, the N in this whole thing is "necessity," and I get the need -- I get the benefit that -- that comes through government to renewable developers and to anyone who really wants to meet Minnesota's policy -- policy goals, but I'm not convinced of the rest quite yet, but I'll certainly be doing a lot of discussing and thinking.

MR. SCHOCK: I have one other one. I forgot about this from earlier.

So I just want to clarify. So this line is not needed because of Applied Digital's load at either Ellendale or Jamestown?

UNIDENTIFIED SPEAKER: Speaking specifically for Ellendale, no.

UNIDENTIFIED SPEAKER: And for Otter Tail, no, it's not needed for Applied Digital at Jamestown.

MR. SCHOCK: Okay. We've got a couple of concerned landowners who had made that claim. And I was fairly certain that was the answer. I just wanted to confirm it. So if neither of those loads showed up, you would still be here requesting this same certificate. Okay.

COMMISSIONER CHRISTMANN: Okay. One more time, any other questions? Staff? Commissioners?

COMMISSIONER FEDORCHAK: Unh-unh.

COMMISSIONER CHRISTMANN: Okay. Is there any objection to the evidence produced today becoming part of the official record? And by "the evidence," I'm talking about the recording of the discussion as well as the slides.

MR. ENDRIS: No, Your Honor -- or Commissioner.

(Laughter)

COMMISSIONER CHRISTMANN: MDU?

MS. WALDON: No objection.

MR. JOHNSON: No --

COMMISSIONER CHRISTMANN: Staff?

MR. JOHNSON: -- objection from staff.

COMMISSIONER CHRISTMANN: Okay. So the evidence will become part of the record upon which a decision will be made.

Are there any other matters to come before the Commission?

Hearing none, this informal hearing is concluded. Thank you, everyone.

COMMISSIONER HAUGEN-HOFFART: Thanks, everybody.

COMMISSIONER FEDORCHAK: Thank you.

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Dated this date of September 8, 2025.

Lisa A. Hulm
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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 INFORMAL HEARING

July 8, 2024

APPEARANCES

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

OTTER TAIL POWER COMPANY:
Robert Endris, Jason Weiers, Todd Langston, JoAnn Thompson, Matthew Olsen

MONTANA-DAKOTA UTILITIES CO.:
Allison Waldon, Robert Frank, Travis Jacobson, Darcy Neigum, Mark Hanson

PUBLIC SERVICE COMMISSION:
Brian Johnson, Christopher Hanson, Adam Renfandt, Victor Schock, Claire Vigesaa

COMMISSIONER CHRISTMANN: Good afternoon. This is an informal hearing on a case that is a combinational case, Otter Tail Power and MDU, and it's a Certificate of Public Convenience and Necessity request regarding the Jamestown to Ellendale transmission line. It is Case No. PU-24-91.

It's August (sic) 8th, 2024, at 1:32 p.m. I'm Randy Christmann, chair of the Commission, joined by Commissioner Sheri Haugen-Hoffart here in the room with me and Commissioner Fedorchak is on the phone and, I believe, in transit.

I didn't have any opening comments.

Commissioner Haugen-Hoffart, did --

Well, Commissioner Fedorchak, did you have any opening comments?

COMMISSIONER FEDORCHAK: I don't, no. Thank you.

COMMISSIONER CHRISTMANN: Okay. So I'll save yours and combine.

I want to emphasize this is an informal hearing so it involves only undisputed facts. If there are any -- if anything comes up that is disputed, we will have to stop the informal and proceed to scheduling a formal case.

The Applicant goes first, but I will first turn

it over to Commissioner Haugen-Hoffart who is the portfolio holder for any opening comments and then we'll listen to the case.

COMMISSIONER HAUGEN-HOFFART: Okay. Well, thanks, everyone. I think this is going to be an interesting, like, overview and questions regarding a joint filing. So it's so good to see so many people here.

And because Julie is on the phone, before we turn it over to you guys to present, why don't we go around the room and introduce -- introduce everyone so Julie knows who's going to be presenting but who is also in the room.

So I'll go to Brian.

MR. JOHNSON: Brian Johnson, PSC staff.

MR. HANSON: Chris Hanson, PSC staff.

MR. FRANK: Robert Frank, Montana-Dakota.

MS. WALDON: Allison Waldon representing Montana-Dakota.

MR. WEIERS: Jason Weiers, Otter Tail Power Company.

MR. ENDRIS: Robert Endris, Otter Tail Power Company.

MR. LANGSTON: Todd Langston, Otter Tail Power Company.

COMMISSIONER HAUGEN-HOFFART: Do we want -- in the back.

COMMISSIONER CHRISTMANN: Yeah, please pass the mic back.

MS. THOMPSON: JoAnn Thompson, Otter Tail Power Company.

MR. OLSEN: Matt Olsen, Otter Tail Power Company.

MR. JACOBSON: Travis Jacobson, Montana-Dakota.

MR. NEIGUM: Darcy Neigum, Montana-Dakota.

MR. HANSON: Mark Hanson, Montana-Dakota.

MR. RENFANDT: Adam Renfandt, staff.

MR. SCHOCK: Victor Schock, PSC staff.

MR. VIGESAA: Claire Vigesaa, North Dakota Transmission Authority.

COMMISSIONER HAUGEN-HOFFART: Well, thank you everyone for the introductions.

My only question is, as you go through the PowerPoint, do you want us to ask questions at that time or do you want questions held until the end?

MR. WEIERS: Please interrupt with questions along the way.

COMMISSIONER HAUGEN-HOFFART: Okay. So we will turn it over to you guys for your presentation.

MR. WEIERS: All right.

MR. ENDRIS: Thank you, Commissioner. Robert Endris appearing on behalf of Otter Tail Power Company.

Today Jason Weiers will be our main presenter and main responder to questions, but, of course, we have the full Otter Tail and MDU compliment here to help with answers.

COMMISSIONER HAUGEN-HOFFART: Okay.

MR. WEIERS: All right. Well, good afternoon, everybody and thanks again for the opportunity to be here today to talk about Otter Tail and Montana-Dakota's joint petition for a Certificate of Public Convenience and Necessity for the Jamestown to Ellendale 345 kV project.

Today's presentation is going to start with a brief overview of the Applicants. We'll then cover the project description, the need for the project, benefits of the project, and the alternatives considered to the project. We will then explain how the project fits into MISO's Long-Range Transmission Plan and why it was classified as a Multi-Value Project. We'll next review the project schedule and wrap up with a review of the CPCN requirements in the North Dakota Century Code and our conclusions that support granting a Certificate of Public Convenience and Necessity for the JETx project.

So as mentioned earlier, the Applicants in this

case are Otter Tail Power Company and Montana-Dakota Utilities. Otter Tail and Montana-Dakota will co-own the Jamestown to Ellendale project.

As you look back on Otter Tail and Montana-Dakota's history, you'll note that we have over 200 years of a combined experience in serving customers in North Dakota. Over this time frame we've built an extensive network of transmission and generation facilities, and currently Otter Tail owns about 6,000 miles of transmission and about 1,100 megawatts of generation while Montana-Dakota Utilities owns about 3,400 miles of transmission and about 700 miles -- 700 megawatts of generation.

Otter Tail and Montana-Dakota have been long-standing business partners for many, many years, dating back to the 1970s when we first partnered in building the Big Stone Plant. In the 1980s, that partnership continued in partnering to build the Coyote Station. And most recently we partnered in building the Big Stone South to Ellendale 345 kV transmission project between 2011 and 2019. These past successes on these previous projects, along with our articles of incorporation and our continued certificates of good standing that are on file with the Commission, prove that we are fit, willing, and able to construct, own,

and operate the Jamestown to Ellendale project.

MISO approved the Jamestown to Ellendale 345 kV project with five distinct facilities. These five distinct facilities are shown here on the slide.

The first facility is the new 345 kV double circuit transmission line. The project is expected to be between 85 and 95 miles in length and traverse the counties of Stutsman County, LaMoure County, and Dickey County. The line will be co-owned between Otter Tail and Montana-Dakota Utilities.

The next facility approved by MISO was the Jamestown Substation expansion. This is needed to accommodate the new 345 kV line termination as well as an Ellendale Substation expansion that will be needed, again, to accommodate the new 345 line. The Jamestown Substation is currently owned and will continue to be solely owned by Otter Tail while the Ellendale Substation is currently owned and will continue to be solely owned by Montana-Dakota.

In addition to those core project components, there's also upgrades required at the Maple River Substation. This substation is located north of Fargo. And an expansion is needed there, as approved by MISO, to accommodate the replacement of two existing 345/230 kV transformers.

And, lastly, there's also a Twin Brooks Substation expansion that's been approved by MISO as part of the project. This is located down in South Dakota just west of Big Stone. And we'll be expanding this substation to accommodate new 345 kV reactors.

The Maple River Substation is currently solely owned by Otter Tail and the Twin Brooks Substation is jointly owned by Otter Tail and Montana-Dakota Utilities.

The anticipated structures for the project will look very similar to the picture you see on this particular slide and they will be constructed with steel monopole, self-supporting structures. They will be double circuit capable structures and we will be installing one circuit initially, but we'll have space for that second circuit in the future when the need arises.

COMMISSIONER CHRISTMANN: When you talk about joint ownership of the transmission line part, is it equal or is it a percentage one and a percentage the other?

MR. WEIERS: Equal ownership rights so 50 percent ownership rights. Yep.

COMMISSIONER HAUGEN-HOFFART: I mean, while we're on the joint ownership, so if something goes down,

is there, like, a primary contact, secondary contact? I mean, how does that work as far as doing the expansion work, recovery, whatever?

MR. WEIERS: Very good question, Commissioner.

We do have a series of agreements that we have executed and are continuing to work on that will actually designate the lead responder in the case of a maintenance need. So those arrangements will be memorialized and documented as part of the ownership arrangements between Otter Tail and MDU.

COMMISSIONER HAUGEN-HOFFART: Okay.

MR. WEIERS: Yep.

COMMISSIONER HAUGEN-HOFFART: So from the onset of doing the expansion work all the way through on maintaining it?

MR. WEIERS: Correct, yep.

COMMISSIONER HAUGEN-HOFFART: Okay.

MR. WEIERS: Yep.

Just continuing down this slide here, the average structure heighth is expected to be 150 feet tall and the structures will be installed on concrete foundations with between four to six structures per mile.

The estimated cost for the overall project is $440 million as we've included in our application.

The need for the project is driven by reliability concerns that are existing on the 230 kV system in southeastern North Dakota, eastern South Dakota, and west-central Minnesota.

I've included a graphic here that shows the existing transmission facilities in this part of the region.

The existing 230 kV system from Ellendale all the way over to Wahpeton plays an important part today in exporting generation from North Dakota. Today what happens on the system is an outage of the Big Stone South to Ellendale 345 kV line results in excessive loadings on the existing 230 kV line. This excessive loading also leads to some voltage depressions.

After completion of the new 345 kV line from Jamestown to Ellendale, the generation that is forced to flow in that 230 kV system during that Big Stone South to Ellendale outage will now have an alternative path to head north from Ellendale up to Jamestown where it can then jump on the existing 345 kV facilities and make its way towards Fargo.

The green dots and the green lines on this map actually represent the facilities that no longer have excessive loadings after we complete the Jamestown to Ellendale project as identified in the studies that have

been completed by MISO.

And I did get this real handy-dandy laser pointer so I could actually show that on the map if I had been thinking ahead of time, but I can -- I can certainly show it now.

So the Big Stone South to Ellendale project is this gray line through this part of the system here. And then the existing 230 kV system is here from Ellendale heading east to Forman or to Hankinson and then up to Wahpeton.

So as I was mentioning earlier, in today's system a loss of the Big Stone South to Ellendale 345 kV line forces the generation coming from North Dakota to have to go down the 230 kV system which is constrained today. As we look at the future condition of the system and the addition of Jamestown to Ellendale, an outage of Big Stone South to Ellendale will now allow for an alternative transmission path for the generation to flow from Ellendale up to Jamestown where it will then be able to jump onto the 345 kV line from Jamestown towards Fargo and make its way to the rest of the region.

COMMISSIONER CHRISTMANN: I just want to repeat that back --

MR. WEIERS: Okay.

COMMISSIONER CHRISTMANN: -- to make sure I

understand what we're trying to fix. It's the worry that the Ellendale to Big Stone goes down --

MR. WEIERS: Yep.

COMMISSIONER CHRISTMANN: -- forcing everything to go from Ellendale to Hankinson?

MR. WEIERS: On the existing 230 kV system, correct.

COMMISSIONER CHRISTMANN: That's inadequate?

MR. WEIERS: Yeah.

COMMISSIONER CHRISTMANN: And so now if this were constructed, if that Big Stone to Ellendale goes down, it can divert up to Jamestown and go east?

MR. WEIERS: Correct, yeah.

COMMISSIONER HAUGEN-HOFFART: And there's plenty of capacity from Jamestown to Fargo to take that on?

MR. WEIERS: Yeah. So MISO is studying the system out in 2030. And as they've done the contingency analysis looking at the various combination of outages that are possible, there were no additional overloads identified as you go from Jamestown towards Fargo. That's correct.

COMMISSIONER CHRISTMANN: What is the flow of most of the energy? You know, when we say Big Stone to Ellendale, I think of energy that is being created at the Big Stone Plant and coming north. But when you were

talking, you said the energy produced in North Dakota that's flowing down to Ellendale.

MR. WEIERS: Yep.

COMMISSIONER CHRISTMANN: And so which is the predominant --

MR. WEIERS: That's a great question, Commissioner.

COMMISSIONER CHRISTMANN: -- of energy that we're dealing with here?

MR. WEIERS: Yep, great question, Commissioner Christmann.

Most times during the course of the year as you look at the generation patterns on the system, there is a predominant flow of energy in this region from west to east. So we are seeing flows from Ellendale to Big Stone South most of the year. And this is especially predominant when we have the off -- off-peak or light-load conditions, where we have high generation and low load, we see the bias of flow in the system from west to east, most of the time from Ellendale to Big Stone South.

COMMISSIONER CHRISTMANN: And so when we always refer to it out of habit as Big Stone to Ellendale, it's really more the other way around?

MR. WEIERS: Yeah. And the line can flow either

way as an AC transmission line but, generally speaking, the historical flows have been from Ellendale to Big Stone South, yeah.

COMMISSIONER CHRISTMANN: Okay.

MR. WEIERS: All right. The Jamestown to Ellendale project will bring several benefits to the local and regional area as we think about adding a new transmission line like this.

We've already talked about the enhanced reliability that the project will bring to the -- to the area. Through the course of the MISO analysis, they've identified that this project will relieve excessive loadings on 70 transmission facilities and address 97 voltage violations as they've done their contingency analysis of this future condition.

COMMISSIONER HAUGEN-HOFFART: Repeat that again.

MR. WEIERS: The analysis performed by MISO, looking at the various contingencies on the system, has identified that this project will help relieve excessive loadings on 70 different transmission elements and address 97 voltage violations in those future, out-year conditions.

The project will also increase transmission capacity that will have the ability to enable new commercial and industrial loads.

And when you think about a 345 kV line of this magnitude, we're talking about load additions that are possible in the magnitude of what we've already seen happening out in this area. As folks are aware, Applied Digital has added some load at Jamestown and Ellendale. A project like this is going to help serve that load and also result in the ability to add more larger-scale loads like that, not only at the end points but also anywhere along the line through the course of a future interconnection.

COMMISSIONER CHRISTMANN: I just got to go back to what I was talking about before with the Ellendale to Big Stone flow. So really this is more about Ellendale to Jamestown than it is Jamestown to Ellendale.

MR. WEIERS: Yeah.

COMMISSIONER CHRISTMANN: But we need the vowel in the middle for the really cool acronym; right?

(Laughter)

COMMISSIONER CHRISTMANN: But the flow will generally be when it's needed going north?

MR. WEIERS: That's my -- that's my understanding. As you look at the system as an integrated system, interconnected on all those different places, really the Jamestown to Ellendale line will provide relief on that existing 230 system for an outage

of the Big Stone South to Ellendale line.

COMMISSIONER CHRISTMANN: Okay.

MR. WEIERS: Yep, yep.

COMMISSIONER CHRISTMANN: Thank you.

MR. WEIERS: All right. The JETx project will also accommodate new generation in North Dakota. I'll just mention as a part of MISO's studies of these future conditions, they added about 4,500 megawatts of new generation in North Dakota, and this line will help accommodate that future generation development.

It's also going to help reduce transmission congestion. That's going to help allow existing North Dakota generation to operate more often to get their product to the market.

In addition, the project will also increase resilience to extreme weather events. I believe Otter Tail was in front of the Commission in the past talking about the 2023 Christmas ice storm and the conditions that we experienced out at Jamestown. We had a situation this past Christmas season where we had lost both 345 kV lines into the Jamestown load pocket, and that forced us to have to operate the Jamestown pocket as an island for the matter of about one and a half days. We supported that entire load pocket through the use of our existing peaking plants that run off diesel

fuel.
As we look at adding the Jamestown to Ellendale project, we'll now have a third source into the Jamestown load pocket and this will help reliably support that load in the event that we lose both of those 345 kV lines into Jamestown again. So tremendous reliability benefits for the Jamestown area.
As we look at the southern end of this project at Ellendale, there's also going to be benefits to that area as we think about the current line from Big Stone South to Ellendale really ends at Ellendale as a 345 kV line. Connecting Jamestown down to Ellendale will now create a looped 345 kV system and help address some of those voltage stability concerns that are present today at Ellendale.
COMMISSIONER CHRISTMANN: What are the two 345 lines that are currently going into Jamestown?
MR. WEIERS: There's two lines today. One comes from Center and goes over to Jamestown and then it continues east to Buffalo, North Dakota, and then ultimately over to Bison Substation and then Maple River, which is just outside of Fargo.
COMMISSIONER CHRISTMANN: Okay.
MR. WEIERS: Yep. All right.
Going down the benefits here, the next benefit

is support to local landowners. As we think about boosting the local economy, Otter Tail and Montana-Dakota Utilities estimate that we'll be paying over $10 million to local landowners in this area as a result of the easement payments that we'll be paying for the project. It's also going to generate tax revenues for many of those governmental entities that support -- or that collect taxes, primarily in the form of property taxes.
And also, as you think about the work needed to construct a project of this magnitude, we'll also be looking to lever some of the local service providers in the area. It could be tree-clearing companies. It could be local contractors to help with road improvements; collecting or, you know, getting gravel, getting aggregate concrete. Those are all things that we hope to be able to leverage the local businesses for.
And, lastly, as you think about the workforce needed to build a project like this, many of the local businesses will also benefit by purchasing fuel, meals, and lodging during the construction phase of the project.
Speaking of construction, we do expect between 100 and 150 employees on-site during the construction phase of the project, and we're hoping to be able to

leverage some of the local skilled laborers for performing some of this work.
COMMISSIONER CHRISTMANN: Regarding the landowner payments, have you started easement acquisition yet and how enthusiastic have the landowners been to have that opportunity?
MR. WEIERS: We have started land acquisition efforts. Last August we started asking for survey permission along a proposed route, and then in February of this year we started asking for options to get easements on property.
Through the course of this interaction, we've actually been taking landowner feedback in the form of suggested revisions to our route, and at this point in time we've looked at over 30 different reroutes for the line. And negotiations with landowners continue to go well. As of last week, we reached about a 33 percent volunteer easement status. And we're continuing to work on that and will continue to work on that throughout the development phase of the project.
COMMISSIONER HAUGEN-HOFFART: You said you've looked at -- I don't remember how many reroutes. Have you rerouted it or are you looking at it? I'm just curious on that.
MR. WEIERS: So over the course of landowner

discussions, oftentimes we hear alternative ideas on where to reroute the transmission line. So to date I would say that we've experienced -- or we've processed over 30 different reroute requests from landowners.
(Commissioner Fedorchak enters room.)
MR. WEIERS: So of the over 30 reroute requests we've gotten from landowners, I don't have an exact number on how many we were able to grant, but it has been most of them.
And I don't know if anybody else has any additional color on that on the project team, but I'll open it up if there's any additional feedback.
UNIDENTIFIED SPEAKER: Yes. We continue to -- as we engage with landowners, we continue to see more and more reroutes, but they're small reroutes, primarily on their property. They just want it moved to one side or the other.
COMMISSIONER HAUGEN-HOFFART: Sure.
COMMISSIONER CHRISTMANN: And when you said "about 33 percent of easements acquired," are you talking about the number of landowners that would need to be dealt with or about the linear miles of the line?
MR. WEIERS: It's based on the number of landowners. At this point we have about 170 unique landowners along the proposed route, and we've acquired

about 33 percent of the easements that we need for the line so far.

COMMISSIONER FEDORCHAK: I have a question about the voltage and the voltage violations that you talked about a little bit ago. Could you give me those numbers again, Jason, and then kind of explain, give us some examples of what's happening there? I think you called it loading and voltage violation?

MR. WEIERS: Yep. Sure. Commissioner Fedorchak, if you don't mind, I'll maybe go back to this previous slide --

COMMISSIONER FEDORCHAK: Sure.

MR. WEIERS: -- so I can use the map to explain this in a little more detail.

So each transmission facility has a rating associated with it, and that rating is set by the owner to avoid any damage to the facility and to avoid any safety concerns. And as you think about excessive loadings on the transmission system, this is a condition where the loading on the facility has exceeded the safe operating limit of the line. So in those situations, the market may have to redispatch to avoid that overload issue or may have to pursue underlying upgrades to fix those loading issues.

And on the map again, just to illustrate this,

it's this 230 kV path from Ellendale to Forman to Hankinson up to Wahpeton that's experiencing some excessive loadings and then also from Hankinson as we head down towards Big Stone. You'll see this is a -- the system that's exporting this generation from North Dakota to the neighboring states.

So as we look at the addition of the Jamestown to Ellendale 345 kV project, we have found that the additional line will relieve excessive loadings on 70 different transmission elements during this contingency analysis performed for that future condition.

COMMISSIONER FEDORCHAK: And is that, like, how often? Is it a constant thing or, like, how often are these excessive loadings happening?

MR. WEIERS: I don't have an exact count of how many hours per year, but, generally speaking, these are typically times of the year when we're seeing a large amount of generation and lower amounts of load so we have higher flows throughout the system. We also see some of these same challenges during winter peak conditions when the load in this area is higher than it is in the summer.

COMMISSIONER FEDORCHAK: Okay.

MR. WEIERS: And if I may, Commissioner Fedorchak, just one other quick comment on these

excessive loadings.

Along with excessive loadings comes depressed voltages. What you'll see on these transmission facilities is the higher you load them, the lower the voltages will be on the system. So, generally speaking, we're going to see excessive loadings and depressed voltages accompany one another in these same areas, and that's exactly what's happening here. As this 230 kV system is loading up to its maximum rating, the voltages are dipping to a point where it's violating the criteria set by the owner and we need to do something to fix those issues.

COMMISSIONER FEDORCHAK: So when it's -- when the demand is lower than the generation, which you said is one of the drivers, is there demand out of the state that wants that power? Or what's stopping it from just being curtailed and how will that -- I guess if there's a demand, how will more transmission help if there's no demand, or maybe the demand is just out, someplace else? So explain that.

MR. WEIERS: Sure. This would all be basically determined through MISO's dispatch in the energy market. And to the extent that there is demand outside of the state, the MISO Market Dispatch would try to get that generation out of North Dakota and to those neighboring

states as long as we had sufficient transmission capacity available to export that generation. To the extent that that transmission capacity is constrained, then they'd have to curtail generation so that it would be bottled up within North Dakota.

COMMISSIONER FEDORCHAK: So is what's happening now is there's this constraint so it can't get out, there's demand outside but it's constrained or -- I'm a little confused by your comment that one of the cause of the voltage violations is it occurs at a time when there's low demand and excessive generation.

MR. WEIERS: Yep. Yeah. And that's a situation where the flow on the transmission system is at its maximum rating so that -- that we can't get any more generation out of -- out of the state in those situations.

COMMISSIONER FEDORCHAK: But it's wanted outside of the state. Somebody wants it. It just can't get there.

MR. WEIERS: Correct.

COMMISSIONER FEDORCHAK: Okay.

MR. WEIERS: Yep.

COMMISSIONER FEDORCHAK: So the demand just isn't local.

MR. WEIERS: Correct.

COMMISSIONER FEDORCHAK: Got it. All right. That makes more sense now. Thank you.

COMMISSIONER CHRISTMANN: But what about when it's not wanted? Then by doing this, we've just added more generation into the mix that has to curtail; correct?

MR. WEIERS: Can you repeat that, please?

COMMISSIONER CHRISTMANN: Okay. You seem to be alluding to times when the energy is needed somewhere and this would open more avenues to get it there. But what about the times in the middle of the night and the nice spring and autumn evenings when it's not needed anywhere and we're curtailing and curtailing? If you're right that this will add opportunities for more generation in North Dakota, doesn't it just mean more generation facilities that need to curtail and lose money?

MR. WEIERS: It's possible that could be a situation, but I'm assuming most generation developers would be doing their homework before they would be interconnecting with the grid to make sure that they have a viable business opportunity before proceeding.

COMMISSIONER CHRISTMANN: I -- I agree with that, the developers do, because they get subsidized. It's the existing ones that are left hanging out to do

the curtailing.

MR. WEIERS: Yeah. And that comes down to how they set their market prices as they enter the market and MISO chooses which resources to dispatch.

Okay. I think we're on slide 7.

So as MISO performed their studies of the area here, they did evaluate five different alternatives to determine if any feasible alternative was out there that more effectively addressed the reliability concerns that were appearing on that 230 kV system in southeastern North Dakota, northeastern South Dakota, and west-central Minnesota.

This particular slide has a table that shows all of the various combination alternatives that MISO considered. And as you'll notice, the list of alternatives here, you'll note that the Jamestown to Ellendale project is part of every different alternative that was tested by MISO, which further reinforces the importance and the benefits of the project to not only the region but also this local area.

The Jamestown to Ellendale project was identified as part of the Tranche 1 Portfolio for MISO's Long-Range Transmission Plan. This long-range transmission planning effort started back in 2020 and is planning to be broken into four different phases or four

different tranches of transmission projects.

As shown on the slide here, Tranches 1 and 2 are focused on the Midwest subregion of MISO while Tranche 3 will then turn its focus to MISO's South region, and then Tranche 4 will look at focusing on intraregional projects to help strengthen the connections between the Midwest subregion and the South subregion.

COMMISSIONER FEDORCHAK: It's really five tranches.

MR. WEIERS: Yeah. You consider Tranche 2.1 and 2.2 --

COMMISSIONER FEDORCHAK: I'm not buying the marketing. Sorry.

MR. WEIERS: Yeah. Understood.

COMMISSIONER CHRISTMANN: So do you mean there's a fifth one that's not mentioned here --

COMMISSIONER FEDORCHAK: No.

COMMISSIONER CHRISTMANN: -- or you mean 2.1 and 2.2 are two different tranches?

MR. WEIERS: Yes.

COMMISSIONER FEDORCHAK: Yeah. They really are.

COMMISSIONER CHRISTMANN: So you mentioned this one being $440 million. No. This project being $440 million. What was the total price tag of --

COMMISSIONER HAUGEN-HOFFART: Ten billion.

COMMISSIONER CHRISTMANN: -- Tranche 1? Ten?

MR. WEIERS: Yep. Ten point -- $10.3 billion was the approved cost of the Tranche 1 Portfolio.

COMMISSIONER CHRISTMANN: And go through 2, 3, and 4. You can divide 2 or put them together.

MR. WEIERS: Are you talking about the --

COMMISSIONER CHRISTMANN: Estimated costs.

MR. WEIERS: At this point in time the other tranches aren't known. They're not finalized yet so it's hard to put a price tag on them.

COMMISSIONER CHRISTMANN: Just estimates out there.

MR. WEIERS: Yeah, I -- I'm not comfortable stating a specific estimate because I don't believe that the portfolios are finalized yet.

COMMISSIONER FEDORCHAK: Tranche 2 is looking like -- if you combine them, 30 to 50 billion. Probably a lot closer to 50.

COMMISSIONER CHRISTMANN: For just --

COMMISSIONER FEDORCHAK: Because Tranche 1 -- 2.1 is almost 30. Actually, Tranche 2.1 is almost 30 billion.

Right, Adam? Yeah.

So they haven't really put a price tag on 2.2 that I've seen but --

COMMISSIONER CHRISTMANN: So 2.1 you said is about 30?
COMMISSIONER FEDORCHAK: Uh-huh.
COMMISSIONER CHRISTMANN: And 2.2?
COMMISSIONER FEDORCHAK: They haven't really said. And I don't know, what did -- is Tranche 3's at all -- price tag range?
UNIDENTIFIED SPEAKER: Just a range (inaudible).
COMMISSIONER FEDORCHAK: Yeah.
COMMISSIONER CHRISTMANN: Okay.
MR. WEIERS: Okay. Moving on to slide 9, again refocusing our discussion here on Tranche 1, MISO did take about two and a half years to perform the studies to support the Tranche 1 Portfolio through the course of several different stakeholder meetings and workshops. And as a result of all that study work, they did approve 18 new transmission projects in July of 2022, and they call that the Tranche 1 Portfolio.
As you'll notice on the map here, the Jamestown to Ellendale project is project number 1 on the map.
COMMISSIONER HAUGEN-HOFFART: I was just curious, how did you prioritize the difference between Tranche 1 to Tranche 4? What were the key components on that? I mean --
MR. WEIERS: Yeah.

COMMISSIONER HAUGEN-HOFFART: -- north versus south?
MR. WEIERS: Sure. Thanks, Commissioner, for the question.
The actual prioritization of looking at which parts of MISO was performed by MISO. And the reason that they focused on the Midwest subregion first is because they're seeing the amount of generation being built in this region is far outpacing what's happening in other parts of MISO. So they're attempting to try to get ahead of the transmission needs because of the faster development of generation up in this region.
COMMISSIONER HAUGEN-HOFFART: Getting it out more?
MR. WEIERS: Yeah.
COMMISSIONER HAUGEN-HOFFART: Okay.
MR. WEIERS: So as Commissioner Christmann had just asked about here, this slide actually indicates that Tranche 1 represents over 2,000 miles of new and upgraded high-voltage transmission. And the price tag that was associated with the Tranche 1 was $10.3 billion.
As you think about these Tranche 1 projects, they do offer multiple benefits. And because of those multiple benefits, all these projects as part of the

Tranche 1 Portfolio were approved as Multi-Value Projects, or MVPs, under MISO's tariff.
So under MISO's tariff, a transmission project can be approved as an MVP if it meets one of three criteria: It needs to address a reliability issue that's in violation of a NERC reliability standard; it needs to provide economic value across a broad area with a benefit-to-cost ratio of 1.0 or higher; or it needs to support the reliable and economic delivery of energy.
Because the benefits of the Tranche 1 Portfolio are spread broadly across the entire Midwest subregion, the cost of the Tranche 1 Portfolio is shared on a pro rata basis to all loads in that Midwest subregion based on energy usage. So what this means for Otter Tail's North Dakota customers is that they'll be paying for .61 percent of the projects and Montana-Dakota's North Dakota customers will be paying for about four -- 0.47 percent of the projects.
COMMISSIONER CHRISTMANN: So does the southern region pay anything for these?
MR. WEIERS: In this case, the benefits were limited to just the Midwest subregion. So that's the only load area that (indiscernible) allocated costs from the Tranche 1 Portfolio.
COMMISSIONER CHRISTMANN: And based on a couple

slides ago, Tranche 3 will be just about the opposite.
MR. WEIERS: Based on the focus for Tranche 3, we expect that the cost allocation would be limited to the MISO South subregion.
COMMISSIONER CHRISTMANN: What about that big Tranche 2? That's north?
MR. WEIERS: The intent is to focus on the Midwest subregion, yep.
COMMISSIONER CHRISTMANN: Okay.
MR. WEIERS: All right. The next slide has just an overview of the project schedule.
As I mentioned earlier, we started outreach to landowners back in 2023. We actually held some public meetings to get input on the routing process back in early to mid-2023 and then began defining a proposed route in late 2023.
And we started securing land rights for the route in early 2024; in February, in fact. We do plan to file a combined Certificate of Corridor Compatibility and Route Permit Application late in Q3 of this year.
And we're hoping for a PSC decision on the combined route permit filing in the early -- early in the second half of 2025.
Assuming all this goes as planned, we would plan to start pre-construction activities in the fall

of 2025. And some of those pre-construction activities would include tree clearing. We'd be working on laydown yards and getting road improvements ready to start construction in the spring of 2026.

We'd start first, of course, with foundation drilling, and then that would be followed up with setting structures, and then finally stringing conductor.

And as the current schedule stands, we would have two to two and a half years construction and wrap the project up and have it in service by the end of 2028.

All right. We have reviewed Chapter 49-03 of the North Dakota Century Code and believe that we are in compliance with the requirements needed to obtain a Certificate of Public Convenience and Necessity. As you review our application, you'll note that the Jamestown to Ellendale project will not interfere with the service provided by any of the other utilities in the area.

Otter Tail and Montana-Dakota have articles of incorporation on file with the Commission. And Otter Tail and MDU are committed to obtain all the applicable permits from federal, state, and local authorities prior to starting construction.

So, in conclusion, we believe that public

convenience and necessity will be served by Otter Tail and MDU's construction, ownership, and operation of the project because of the reliability and economic benefits provided to customers. The project is part of the MISO's long-range plan and was approved as part of their 2021 Transmission Expansion Plan because of the reliability and economic benefits that it enables as part of the overall Tranche 1 Portfolio.

And Otter Tail and MDU are fit, willing, and able to construct, own, and operate the Jamestown to Ellendale project as proven by their articles of incorporation, their certificates of good standing, and their success in past projects.

COMMISSIONER FEDORCHAK: Jason, did you -- was this project a standalone on the cost-benefit analysis or did it -- I forget how it works. Was it all the MVPs were done together?

MR. WEIERS: That's -- the latter is correct, Commissioner Fedorchak. All MVPs were done together.

COMMISSIONER FEDORCHAK: Okay. Have you guys done a cost-benefit of just this project?

MR. WEIERS: We have not. In fact, Otter Tail doesn't have the necessary software to perform that calculation.

COMMISSIONER FEDORCHAK: Okay. And the benefits

that you mentioned in your discussion about benefits including, like, landowner payments and tax -- tax revenue, etcetera, those aren't part of the MISO business case, are they?

MR. WEIERS: They are not actually --

COMMISSIONER FEDORCHAK: Okay.

MR. WEIERS: -- part of the MISO business case.

I will mention to the commissioners here today that Otter Tail and Montana-Dakota have commissioned a study with North Dakota State University to help better quantify the benefits of the project to the local area, and we do include -- we do plan to include that study as part of our upcoming combined Certificate of Corridor Compatibility and Route Permit Application. So the Commission will get a chance to see that coming up as we finalize that and better quantify those local benefits.

COMMISSIONER HAUGEN-HOFFART: Who's doing that study?

MR. WEIERS: We've commissioned North Dakota State University, NDSU.

COMMISSIONER FEDORCHAK: You mentioned that this will accommodate 4,500 megawatts of new generation. Do you know where MISO got that figure? Or did you guys give that to them? Where's that come from? And is that generation in the queue? You know, how do we -- do we

have confidence that that's actually probably going to materialize?

MR. WEIERS: The 4,500 megawatts was determined through MISO's stakeholder process when they built the futures to analyze as part of the other TP study. And it's my understanding that the 4,500-megawatt assumption of generation in North Dakota was based on a variety of inputs including stakeholder input from utility integrative resource plans. If there was an announced project, they made sure they included that in their assumptions. And then they also did look at the queue and they tried to determine where there's been recent activity and used some of those locations as well for the future generation siting assumptions.

COMMISSIONER FEDORCHAK: Okay.

And then you probably covered this and I missed it, but the O&M for this line, how is that handled in terms of covering the cost?

MR. WEIERS: Yeah. The -- the O&M costs for the MVP projects are recovered as part of the overall MISO tariff.

COMMISSIONER FEDORCHAK: Okay.

MR. WEIERS: So we will calculate O&M charges and pass those through as MVP charges under Attachment MM of Otter Tail and Montana-Dakota's respective

attachments in MISO.
COMMISSIONER FEDORCHAK: Okay. So is it safe to, kind of just in a simple manner, assume that this is a decently-size investment in both your systems that you'll pay only a fraction of the cost for it?
MR. WEIERS: Yeah, that's correct, Commissioner Fedorchak. The calculations that have been performed by Otter Tail and Montana-Dakota Utilities indicate that North Dakota customers will be paying, roughly, .61 percent -- I'm sorry, let me back up a minute there. Otter Tail's North Dakota customers will be paying .61 percent of this project cost and Montana-Dakota customers in North Dakota will be paying 0.47 percent of the overall project cost.
COMMISSIONER FEDORCHAK: Okay.
COMMISSIONER HAUGEN-HOFFART: But what's the impact to the maintenance of it? How does that affect the -- you know, the ongoing costs? Because you have -- maintain a hundred percent ownership on one and joint, but that's got to be some ongoing costs and which repairs will pay for.
MR. WEIERS: The MVP costs for O&M are treated the very same way they are for the investment needed to get the projects constructed. So if it's a capital cost upfront for part of the construction costs or an O&M

cost after the project goes in service, those costs are allocated similarly across the MISO Midwest subregion.
COMMISSIONER HAUGEN-HOFFART: Okay.
COMMISSIONER CHRISTMANN: I want to go back to that allocation. It's one thing to talk about that on $440 million. And it was wonderful because we're only paying this small part of the costs of this. But this is the thing with socialization. In agreeing to that, we're paying that same part of the costs of the other more than $9 and a half billion involved here and the 30 billion on Tranche 2 and all of that; correct?
MR. WEIERS: That's correct, Commissioner Christmann.
COMMISSIONER CHRISTMANN: So what's the rate impact? In rate cases, we often talk about typical residential customers as an example so that the people that you serve and that we serve understand how they're going to be impacted. What is the impact of this project or Tranche 1 for each company?
UNIDENTIFIED SPEAKER: You got number two?
MR. WEIERS: Okay. So Otter Tail and Montana-Dakota Utilities has performed calculations to determine the rate impact to an average North Dakota residential customer using a thousand kilowatt-hours per month. And as you look at the cost of just the

Jamestown to Ellendale project, Otter Tail residential customers are going to see a rate impact of 18 cents per month, MDU customers will see an impact of 12 cents per month for just the Jamestown to Ellendale project.
COMMISSIONER CHRISTMANN: Doesn't really --
MR. WEIERS: Yeah.
COMMISSIONER CHRISTMANN: Doesn't really interest me because we're talking about a package deal.
MR. WEIERS: So I have those numbers handy here as well.
As you look at Otter Tail's impact for North Dakota customers from the full Tranche 1 Portfolio, again, an average residential customer for Otter Tail using a thousand KW-hours per month, the rate impact is estimated to be $5.85 per month.
UNIDENTIFIED SPEAKER: Montana-Dakota's additional cost for the entire Tranche 1 would be about $3.15 a month.
MR. HANSON: Would it be safe to say that if you're considering that's about, roughly, $10 billion, we're talking another 30 to 40 billion. So if you take that number times four and add to that, I mean, you get an idea of what the cost of Tranche 1, Tranche 2 would be. So it would be somewhere in the mid-30s per month probably per customer once Tranche 2 and 3 are through?

Is that fair to say?
MR. WEIERS: From a rate impact perspective, I think that's a fair statement. I just don't want people to lose sight of the benefits that these projects also offer to the local area and the region in general.
So, yeah, if you look at it just purely on a rate impact basis, that's a reasonable assumption, Chris, but we also need to look at the full package and there are other benefits these future projects will bring to the region and the local area.
COMMISSIONER CHRISTMANN: So when we do that, I completely understand the impact to government with taxes collected. I can completely understand the benefits to potential -- potential new energy generation that is looking all over the country for places to get in on a transmission system to take advantage of federal subsidies. So I see that as a benefit to them.
I'm wondering about the benefit to Otter Tail and especially to MDU. We talk about the occasional inability to get their power out. Tells me that we have plenty to serve our people. And so we're entering into these compacts for all these socialized projects at a great cost to the system that benefits government and renewable generators, but I'm not getting quite the enormous benefits to the customers of these two

companies.
And I'll just add this to the question because I'd like both companies' responses. I sort of get Otter Tail's because I understand the push from Minnesota to stop using the Coyote Plant power and have all renewal, renewable. I don't really see the pressure on MDU.
MR. WEIERS: Thanks, Commissioner Christmann.
If I could maybe start from Otter Tail's perspective and then I'll hand it over to MDU to respond on their behalf.
As you look at the Jamestown to Ellendale project, one of the huge benefits for Otter Tail, as I mentioned earlier, is the benefits that we're going to see in the local Jamestown area. As you think about the current load pocket and the existing sources into that load pocket, we were in a very difficult position last Christmas with the ice storm that took down both 345 kV lines that serve Jamestown. As a result, we had to run that diesel peaking generation for almost one and a half days that consumed nearly 90,000 gallons of diesel fuel.
If we add this new source from Ellendale up to Jamestown, this additional 345 delivery will result in a very much more -- or a much more resilient and robust transmission system that can serve that Jamestown load pocket, which, by the way, is Otter Tail's largest

community as you think about our service territory across our entire 70,000-square-mile service territory.
So we see tremendous benefits of this project. And over time we knew something was going to be needed to be done to that Jamestown load pocket. This project is going to be a huge benefit because of the fact that we can share the cost of the project with all of the MISO Midwest customers and get the huge benefit to our customers in the Jamestown area, and anywhere along the line as we look to Otter Tail communities even down as far south as Edgeley.
COMMISSIONER CHRISTMANN: Does that happen very often where both those 345 lines were out?
MR. WEIERS: I'll mention that because both -- last Christmas was certainly a unique situation with an extreme weather event. But I will also mention that even when it comes to performing maintenance at the substation, when we have the entire load pocket sourced from a single substation, we do get into some very difficult situations when we try to schedule outages and be ready to survive that next contingency so we don't have a contingency that takes down the entire load pocket. So now this third source will also help ease some flexibility and be -- and being able to perform maintenance more often during the year.

COMMISSIONER CHRISTMANN: And was that always an issue on maintenance or is that just since the addition of the data processing center at Jamestown?
MR. WEIERS: It certainly has gotten more challenging as we've experienced load growth in the area. Even before the addition of the Applied Digital load, we did see some of the residential loads and commercial loads around the Jamestown loop increase over time.
As you think about the Spiritwood Energy Park, there's a lot of activity going on there with the soybean facility going on. We have Aviko Cavendish, a lot of those commercial customers in that area.
And at some point we have reached a load level where the local peaking generation can no longer reliably serve all of that load during certain times of the year. So it's become even more important now to have that third delivery into Jamestown to help serve that area when we have an outage to the existing facilities.
MR. SCHOCK: When both of those 345 lines went down coming into Jamestown, where did they fail at? Was it in that local area or was it somewhere else?
MR. WEIERS: I don't know the exact answer to that. It was outside of the Jamestown Substation.

Actually, Todd, do you have any --
MR. LANGSTON: I know the line between Jamestown and Buffalo failed east of Spiritwood. I'm not sure where the line failed from Jamestown to Center.
MR. SCHOCK: And both failures were directly related to the ice storm?
MR. LANGSTON: Yes.
MR. SCHOCK: Okay. How is this line resistant to ice storms and failure like the other two lines?
MR. LANGSTON: The conductor on this proposed line, JETx line, is going to be T-2. That -- that type of wire, it's a twisted pair, sheds ice. Ice does not form on there and get the galloping that a normal conductor would.
MR. SCHOCK: Okay. Thank you.
COMMISSIONER CHRISTMANN: Before we go to any more, I'd like to get MDU's perspective on the -- unless you had a question and follow-up of Otter Tail's perspective.
COMMISSIONER FEDORCHAK: I don't. I just have some commentary on --
COMMISSIONER CHRISTMANN: Okay.
COMMISSIONER FEDORCHAK: -- Tranche 1 and Tranche 2.
COMMISSIONER CHRISTMANN: This was sort of a

double question. I'd like to get MDU's response.
MR. FRANK: Yeah, I think I'll start and then Darcy probably has some comments to add as well for Montana-Dakota.
There's some -- we definitely see some reliability benefits as well from this increased transmission in the area. I think there's also some opportunities for us from a load-serving perspective as well because we've seen some interest in the area where our transmission has been growing like Ellendale where we can realize some -- some benefits as a company and customers in North Dakota for these increased load opportunities that we have to serve, like data centers.
And I think that Jamestown to Ellendale also gives us an opportunity to increase the transmission investment in North Dakota and allow a maybe future expansion of MISO's transmission system further west more into our system. And I think Jamestown to Ellendale gives -- Jamestown to Ellendale line gives us that opportunity to continue that transmission further west into -- more into MDU's system, I think, in the future.
MR. NEIGUM: I would agree with what Rob says.
And the other one that we're looking at too is this looking for a need for additional generation to

come into the state, whether it's for ourselves or other developers. So, you know, without projects like this, it's hard to develop additional generation within the state. And so it does provide those opportunities as well. You know, one, for our own utilities to be able to supply the needs for our customers and also at least for additional development to happen in the state that otherwise wouldn't happen.
COMMISSIONER CHRISTMANN: Thank you.
COMMISSIONER FEDORCHAK: So kind of stepping off of those comments, when Tranche 1 was being discussed and the cost allocation -- this is more background for my colleagues -- when the cost allocation was being discussed, our office and Darcy, so MDU, tried really hard to get a generator-pays component to the formula. I mean, we took many, many runs at it and were starting to get some traction. And then people got nervous that we're taking too long and had to get going and, you know, it takes so long to build, etcetera, etcetera, so they move forward with this postage stamp approach.
And so we ultimately went along with it for the reasons, you know, both the reliability reasons and recognizing, like, North Dakota is an exporting state and we have potential to export more both from the gas side, gas generator side, perhaps through coal with

carbon capture and storage if -- if that's proven out, or if the science changes, you know, there might be more hope for the -- our coal fleet and through wind -- you know, wind and renewables. So this Tranche 1 seemed like much more of backbone-type investments to bring this system up to speed.
I will say Tranche 2 is much more about helping the states -- and they even state this, MISO even states this -- Tranche 2 is much more about helping the states meet their goals.
So in my opinion, I don't think that -- and I'm not prepared to just have North Dakota, as long as I'm here, go along with Tranche 2 depending on how it all shakes out, but I mean that's -- that's a play that we need to be looking at down the road, but there should be a generator-pays component to that and there isn't. And they fought it tooth and nail.
And the benefits to our state of that, especially 2.1 where we basically aren't even connected and they've left MDU high and dry in that there's no investments -- they don't even have in this system west of Jamestown on the map on their Tranche 2 stuff.
So that one is an area where North Dakota needs to be very engaged in watching how the costs come forward and how those -- what the benefits are of those

projects, how they address the cost-benefit analysis and -- and be prepared to not go along with it.
Anyway, commentary, not for today's case.
COMMISSIONER HAUGEN-HOFFART: So there's a lot of flexibility on the difference between the different tranches and the cost allocation or is it --
COMMISSIONER FEDORCHAK: No, no.
COMMISSIONER HAUGEN-HOFFART: -- are you saying we did this for 1, it's got to be this way for 2, 3, 4, whatever?
COMMISSIONER FEDORCHAK: There's no flexibility. The cost allocation is set and it would have to be fought at FERC if we wanted to not go along with it.
COMMISSIONER HAUGEN-HOFFART: Okay.
UNIDENTIFIED SPEAKER: A quick question on cost. You know, I don't think I'd be the only one who was a little shocked by the cost of the project. I would imagine you guys were probably maybe not surprised by it. But looking back at the cost of industrial materials and things like that, you'd be at like 85 miles, and when you do the breakdown between the substations and the lines, you've got somewhere in the ballpark of $4 million a mile for four structures per mile.
I mean, how does that compare to more recent

projects that you guys have done and what kind of an inflation? Is it twice the cost of what you did ten years ago? Any sense of that?

MR. WEIERS: Yes. It's basically doubled as what we had done on BSSE. BSSE, we hit the steel prices at an all-time low. Right now these steel prices, the indices are twice that what we had paid for BSSE. Along with concrete prices also.

UNIDENTIFIED SPEAKER: And what year was that?

MR. WEIERS: It was in service in 2019.

COMMISSIONER HAUGEN-HOFFART: Julie, you missed the brand?

COMMISSIONER FEDORCHAK: It's very intriguing.

COMMISSIONER HAUGEN-HOFFART: Otter Tail --

COMMISSIONER FEDORCHAK: JETx, is that how we say it? JETx? Good job.

COMMISSIONER CHRISTMANN: Are there other questions?

MR. SCHOCK: I thought I could just sit quietly back there and I can't. I tried.

Okay. So cost recovery of a line such as this. You wouldn't be coming in and asking for cost recovery in your transmission rider as rate base; correct? You would be coming in through a MISO charge in the transmission rider. Is that accurate?

UNIDENTIFIED SPEAKER: Different skills.

(Laughter)

MR. SCHOCK: Matt wanted to talk anyways.

MR. OLSEN: Yeah, thanks, Victor. Matt Olsen here.

Most of it. I think you're -- you're accurate about that. There's a small portion that's rate base.

MR. SCHOCK: Okay. So what portion would be rate base?

MR. OLSEN: The small portion that represents North Dakota customers of Otter Tail.

MR. SCHOCK: Okay. So this .6 -- .6 percent, roughly.

MR. OLSEN: Yeah.

MR. SCHOCK: That portion you would be adding to rate base and getting your North Dakota approved rate of return or your FERC approved rate of return?

MR. OLSEN: Yeah, this is where I probably need help from others. Probably may be better if we work this out in --

MR. SCHOCK: It's just curiosity.

MR. OLSEN: Yeah.

MR. SCHOCK: So you could file something just to kind of clarify those points of the cost recovery.

MR. OLSEN: And it may be there already, but we

can spell it out for you.

UNIDENTIFIED SPEAKER: Well, Matt, maybe speak to the FERC jurisdiction a little bit. I know MDU and Otter Tail have a little bit of a difference between -- you have a small jurisdictional portion but maybe -- I think -- and Victor can correct me if I'm wrong, but I had a misconception at first that this would be a rate base, rate recovery item.

And maybe kind of speak a little bit to the mechanism that -- how that gets recovered through -- or how that gets charged back to customers as opposed to being rate base with a recovery and base rates and how it flows from MISO instead.

MR. OLSEN: Yeah, I -- I think I'll probably add confusion by trying to explain it myself and I'd rather not introduce that here but certainly --

MR. SCHOCK: That's perfectly fine if you're willing to make a subsequent filing just to kind of lay out the cost recovery of what -- what I think would be interesting to demonstrate for -- for this project, for the Jamestown to Ellendale line and for the rest of Tranche 1, how that would pass through to North Dakota customers, because I would assume it's slightly different.

UNIDENTIFIED SPEAKER: And we do have some of

this in data requests so --

MR. OLSEN: Yeah.

UNIDENTIFIED SPEAKER: -- we can just do a little addendum.

MR. OLSEN: I think we'll point there and spell it out for you there.

MR. SCHOCK: Yeah. Okay. Sure.

COMMISSIONER FEDORCHAK: Would it be different for MDU or Otter Tail?

UNIDENTIFIED SPEAKER: Yes.

COMMISSIONER FEDORCHAK: Maybe --

UNIDENTIFIED SPEAKER: Next.

UNIDENTIFIED SPEAKER: Yes, it's different.

UNIDENTIFIED SPEAKER: Slightly. I do know that.

MR. JACOBSON: Travis Jacobson with MDU.

Montana-Dakota would only see in our transmission cost adjustment where we would see the Schedule 26, the MVP piece of that. And that would be the same for Montana-Dakota's JETx project as well as the rest of Tranche 2. That's just going to come through our Schedule 26-A, I think.

MR. SCHOCK: Okay. So -- so then that would be based upon your FERC approved rate of return?

MR. JACOBSON: That's true.

MR. SCHOCK: Okay. So there's other stuff in there other than rate of return but that's --
MR. JACOBSON: Same as BSSE and all the other --
MR. SCHOCK: Yep, yep.
MR. JACOBSON: -- ones today.
MR. SCHOCK: Absolutely.
MR. JACOBSON: That's true.
MR. SCHOCK: Yep. Okay.
MR. JACOBSON: And there is nothing that we would put in rate base at Montana-Dakota.
MR. SCHOCK: Okay. And then -- and that would flow through, you would be charged by the MISO 26?
MR. JACOBSON: I think it's 26-A.
MR. SCHOCK: For how many years?
MR. JACOBSON: Well, until it's gone. So 40.
MR. SCHOCK: 40? 40 years? Okay.
I think that's all I have. I can go down other rabbit holes, but that one seemed most fun.
COMMISSIONER FEDORCHAK: I'll be 95 when that's done.
COMMISSIONER HAUGEN-HOFFART: What's that?
COMMISSIONER FEDORCHAK: I'll be 95 years old when they quit paying for it.
(Laughter)
UNIDENTIFIED SPEAKER: I'll be pretty old too.

(Laughter)
UNIDENTIFIED SPEAKER: But the electrons will still be flowing.
COMMISSIONER CHRISTMANN: When it's windy.
Did that cover your questions?
So I don't know if this is more for staff or what, but we're discussing this with Otter Tail and MDU because you're owners of the line and (indiscernible) certificate, but this rate impact is going to go to Xcel customers too; right?
UNIDENTIFIED SPEAKER: Uh-huh.
COMMISSIONER CHRISTMANN: Do you know how much that is?
UNIDENTIFIED SPEAKER: I can speak to that since Alex -- I spoke to Alex Nisbet.
As far as the allocation of cost per megawatt-hour, it's exactly the same for all of the companies. The difference is, as you see the difference between MDU and Otter Tail's rate for residential customer, theirs is going to be in that ballpark of what they have -- he hasn't gotten back to me on the actual thing, but it has to go through the jurisdictional allocation and the -- and the -- you know, the customer -- or the class allocations to kind of get at the customer rate, but it's going to be in the same

ballpark. So the bottom line --
COMMISSIONER CHRISTMANN: The ballpark is so much different.
UNIDENTIFIED SPEAKER: Well, it -- it --
COMMISSIONER CHRISTMANN: A little over three to almost six.
UNIDENTIFIED SPEAKER: Yeah. And I've asked them to expand upon -- upon that, but the point that I'd make, though, is when you look at the allocation, the cost per megawatt-hour is essentially the same for -- for each company.
So if you think about it like a -- the way I looked at it on a short basis is, if you jump through all the math, is one customer uses about one megawatt-hour per month and the cost was like -- for Tranche 1 was like $2.51 in 2031 per month. So you think it would be 2.51, but it has to go through all the allocations. So it all kind of starts from the same place.
So I'm still waiting to get what that exact number will be, but they all start with the same charges from -- for the same amount of energy from -- from the MISO cross charges through the Transmission 26 or whatever you call it. So I'm waiting to hear what that number is exactly.

COMMISSIONER CHRISTMANN: And the cooperatives are also going to be paying on this.
UNIDENTIFIED SPEAKER: Well, if they're on --
MR. SCHOCK: MISO --
COMMISSIONER FEDORCHAK: MISO co-ops.
UNIDENTIFIED SPEAKER: Yeah, right.
COMMISSIONER FEDORCHAK: Which is Minco -- Minnkota. No, they have their own deal, don't they? Yeah, they're not members. They got some other tariff.
UNIDENTIFIED SPEAKER: But an answer will get -- as soon as Alex gets back to -- I'll get you that information.
COMMISSIONER FEDORCHAK: Is Cass -- Cass County -- no. They're SPP. All right.
COMMISSIONER CHRISTMANN: Okay. Anything else?
COMMISSIONER FEDORCHAK: I don't think so.
COMMISSIONER CHRISTMANN: Well, we'll just say I'm going to continue a lot of discussions with staff. Like I said, the N in this whole thing is "necessity," and I get the need -- I get the benefit that -- that comes through government to renewable developers and to anyone who really wants to meet Minnesota's policy -- policy goals, but I'm not convinced of the rest quite yet, but I'll certainly be doing a lot of discussing and thinking.

MR. SCHOCK: I have one other one. I forgot about this from earlier.

So I just want to clarify. So this line is not needed because of Applied Digital's load at either Ellendale or Jamestown?

UNIDENTIFIED SPEAKER: Speaking specifically for Ellendale, no.

UNIDENTIFIED SPEAKER: And for Otter Tail, no, it's not needed for Applied Digital at Jamestown.

MR. SCHOCK: Okay. We've got a couple of concerned landowners who had made that claim. And I was fairly certain that was the answer. I just wanted to confirm it. So if neither of those loads showed up, you would still be here requesting this same certificate. Okay.

COMMISSIONER CHRISTMANN: Okay. One more time, any other questions? Staff? Commissioners?

COMMISSIONER FEDORCHAK: Unh-unh.

COMMISSIONER CHRISTMANN: Okay. Is there any objection to the evidence produced today becoming part of the official record? And by "the evidence," I'm talking about the recording of the discussion as well as the slides.

MR. ENDRIS: No, Your Honor -- or Commissioner.

(Laughter)

COMMISSIONER CHRISTMANN: MDU?

MS. WALDON: No objection.

MR. JOHNSON: No --

COMMISSIONER CHRISTMANN: Staff?

MR. JOHNSON: -- objection from staff.

COMMISSIONER CHRISTMANN: Okay. So the evidence will become part of the record upon which a decision will be made.

Are there any other matters to come before the Commission?

Hearing none, this informal hearing is concluded. Thank you, everyone.

COMMISSIONER HAUGEN-HOFFART: Thanks, everybody.

COMMISSIONER FEDORCHAK: Thank you.

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