NORTH DAKOTA PUBLIC SERVICE COMMISSION

OTTER TAIL POWER COMPANY AND MONTANA-DAKOTA UTILITIES CO.
CONSOLIDATED APPLICATION FOR A CERTIFICATE OF CORRIDOR COMPATIBILITY AND ROUTE PERMIT

CASE NO. PU-25-236

DECEMBER 26, 2025

PART II

PREPARED TESTIMONY OF ROBERT FRANK

I. Introduction and Background

Q1. Please state your name, employer, and your business address.

A. My name is Robert Frank. I am employed by Montana-Dakota Utilities Co. ("Montana-Dakota"). My business address is 400 North Fourth Street, Bismarck, North Dakota 58501.

Q2. What is your position with Montana-Dakota?

A. I am the Director of Electric Transmission Engineering. I have held this position for the past 11 years. In this role, I have leadership responsibility for project management, engineering, design, construction, and maintenance of Montana-Dakota's electric transmission and substation facilities, including property and right of way acquisitions.

Q3. Please describe your educational and professional background.

A. I am a licensed Professional Engineer in the State of North Dakota. I earned a Bachelor of Science degree from North Dakota State University and a Master of Business Administration degree from the University of Mary. I began my career at Montana-Dakota in 2004 as a system protection engineer in the Substation Department. Throughout the next ten years, I completed several substation and transmission line projects gaining experience in engineering design, project management, construction management, and real estate transactions. In 2014, I accepted my current position. Prior to joining Montana-Dakota, I

worked for an industrial contactor as a field engineer providing engineering support to construction crews and performing project management duties. A copy of my resume is attached hereto as Attachment 1.

Q4. What is your role with respect to the JETx Transmission Line Project (the "Project")?

A. I am the project manager for the Project within Montana-Dakota. I have represented Montana-Dakota throughout the Project's development working alongside the Project development team at Otter Tail Power Company ("Otter Tail"). I have participated in route development and public landowner meetings, represented the Project at local government meetings and hearings, and helped lead the right of way acquisition teams. I have worked with Otter Tail on all regulatory filing and permitting requirements. I regularly attend meetings of all Project teams within engineering, communications, procurement, and overall Project management.

Q5. Are you familiar with the contents of the Project's Consolidated Application for a Certificate of Corridor Compatibility and Route Permit (the "Application")?

A. Yes. I am familiar with the Application's contents.

Q6. What is the purpose of your testimony?

A. My testimony will provide information regarding Montana-Dakota's role with respect to the Project and the benefits of the Project, both locally and for the region. I will also provide information about the Project upgrades needed at Montana-Dakota's Ellendale 345-kV Substation.

II. Montana-Dakota Utilities Co.

Q7. Please describe Montana-Dakota Utilities Co.

A. Montana-Dakota distributes natural gas and generates, transmits and distributes electricity and provides related services in the northern Great Plains. The company serves more than 145,000 electric customers and 290,750 natural gas customers in 273 communities in North

Dakota, South Dakota, Montana, and Wyoming. Montana-Dakota is a subsidiary of MDU Resources Group, Inc., a member of the S&P SmallCap 600 index that provides essential products and services through its regulated electric and natural gas distribution and pipeline segments, which is focused on energizing lives for a better tomorrow.

Q8. Please describe Montana-Dakota Utilities Co.'s mission.

A. Our mission is to, with integrity, deliver value as a leading energy provider and employer of choice. We are committed to serving our customers and communities by providing safe, reliable, and affordable energy services. Our dedication extends beyond utility operations to philanthropic initiatives that foster community growth and well-being.

III. The Project

Q9. Please describe the background of the Project.

A. Several generation facilities have interconnected to Montana-Dakota's 230-kV system in the last ten years without any significant investment in transmission capacity. Montana-Dakota's transmission system is at capacity and in need of additional transmission interconnections. The Midcontinent Independent System Operator, Inc. (MISO) has also recognized this lack of transmission capacity and initiated the Long-Range Transmission Planning ("LRTP") study in 2020 with the objective of providing an orderly and timely transmission expansion plan that results in a transmission system that is reliable, cost-efficient, accessible, and flexible. The Project is one of 18 projects being built within MISO's LRTP Tranche 1 Portfolio approved in the 2021 MISO Transmission Expansion Plan ("MTEP21").

Q10. What is Montana-Dakota's role with respect to the development, construction, and operation of the Project?

A. The Project interconnects with the existing transmission systems of Montana-Dakota and Otter Tail. Specifically, the Project interconnects Montana-Dakota's Ellendale 345-kV Substation and Otter Tail's Jamestown 345-kV Substation. Montana-Dakota and Otter Tail intend to jointly construct and own the Project as tenants-in-common with each owning

fifty percent. Montana-Dakota and Otter Tail are jointly developing and constructing the Project with Otter Tail acting as lead developer and Project manager. Project decisions are made as a team with Otter Tail and Montana-Dakota receiving equal votes. When the Project is placed in-service, Montana-Dakota and Otter Tail will share in the operational responsibilities of the Project.

Q11. Please describe the planned upgrades to Montana-Dakota's Ellendale 345-kV Substation that are necessary for the Project.

A. Montana-Dakota's Ellendale 345-kV Substation will require the addition of 345-kV equipment and components to accommodate the Project. The additional facilities will consist of new termination structures, 345-kV power circuit breakers, disconnect switches, aluminum bus work, structural steel, protection and control systems, and a 345-kV shunt reactor. These upgrades will be constructed within the existing fenced property of the substation.

Q12. What are the benefits of the Project to the grid generally?

A. The Project provides regional reliability benefits by alleviating excessive thermal loadings, and mitigating several voltage issues in eastern North Dakota. The Project will both offer additional redundancy and increase system capability to avoid compromising the reliability of the transmission system. The Project will provide additional outlets for North Dakota and South Dakota by tying two existing 345-kV systems together, while also unloading the existing 230-kV system that is at capacity.

Q13. What benefits is the Project expected to provide to Montana-Dakota's customers?

A. The Project offers significant reliability benefits to the local area by introducing a new 345-kV transmission source into the 345-kV substations at Jamestown and Ellendale, ND. The Project will provide benefits to the Ellendale area by creating a looped 345-kV system. This allows generation facilities from the west of Ellendale to curtail less for contingencies with a second 345-kV outlet at Ellendale. Power quality, specifically voltage stability, is also improved for the area by interconnecting the two 345-kV transmission systems.

Q14. Did the Applicants consider any alternatives to constructing the Project?

A. The Applicants considered a no-action alternative but rejected it. Under a "no action alternative," the Project would not be constructed and the reliability concerns described above would remain. The Applicants determined this would not serve the needs of their companies or the public generally. In addition, a no-action alternative would be contrary to MISO's long range transmission planning objectives and the benefits to the grid described earlier in my testimony would not be realized.

Q15. Are you familiar with the Commission's Certification Relating to Order Provisions and Tree and Shrub Mitigation Specifications?

A. Yes.

Q16. Does Montana-Dakota agree to comply with the Commission's Certification Provisions?

A. Yes. Darcy Neigum, VP Energy Supply, of Montana-Dakota, who has authority to bind the company, has executed the Certification and a copy has been filed with the Commission.

IV. Conclusion

Q17. Based on your knowledge of the Project, will it ensure continued system reliability and integrity?

A. Yes. The Project will support existing needs as well as increase the transmission system capacity and reliability to support future load growth and development.

Q18. Does this conclude your direct testimony?

A. Yes.

ATTACHMENT 1

ROBERT R. FRANK

DIRECTOR, ELECTRIC TRANSMISSION ENGINEERING

P (701) 222-7846

E Robert.Frank@mdu.com

A 400 North 4th Street
Bismarck, ND

W www.montana-dakota.com

PROFESSIONAL SUMMARY

Extensive experience in engineering, construction, and project management of large-scale infrastructure projects. Demonstrated leadership in the utility industry and associated professional organizations.

WORK EXPERIENCE

2014 - Present
Director, Electric Transmission Engineering
Montana-Dakota Utilities Co., Bismarck, ND

- Provide leadership and strategic direction for the engineering, construction, and maintenance of the company's electric transmission system.
- Develop policies, procedures, and company standards that comply with all applicable codes, rules, and regulations.
- Lead the property and right of way acquisition team

2004 - 2014
Staff Engineer
Montana-Dakota Utilities Co., Bismarck, ND

- Apply engineering principles to the development of the electric transmission system.
- Provide design, specifications, support, and project management for construction and technical projects.

2002 - 2004
Field Engineer
The Industrial Company, Casper, WY

- Provide technical assistance to construction crews
- Project management and construction management

PROFESSIONAL AFFILIATION

Professional Engineer, ND State Board of Registration
- Registered since 2008

Institute of Electrical and Electronics Engineers
- Member since 1997
- Section Chair 2009

International Right of Way Association
- Member since 2015
- Chapter President 2024-2026

EDUCATION

University of Mary
Bismarck, ND
Master of Business Administration
2008

North Dakota State University
Fargo, ND
Bachelor of Science
Electrical Engineering
2002

SKILLS

- LEADERSHIP
- PROJECT MANAGEMENT
- ENGINEERING
- STRATEGIC THINKING
- ANALYTICAL
- COMMUNICATION
- PUBLIC SPEAKING
- NEGOTIATING
- PROBLEM SOLVING
- CONFLICT MANAGEMENT