Before the Public Service Commission
of
The State of North Dakota

In the Matter of the Application of
MINNKOTA POWER COOPERATIVE, INC.

Consolidated Application to the North Dakota Public Service Commission for a Certificate of Corridor Compatibility and Route Permit
Agassiz Transmission Line and Substation, Cass County, North Dakota

Case No. PU-26-22

Pre-filed Testimony
of
Brendan Kennelly

I. Introduction

Q1. **Please state your name, business address, and your occupation.**

A1. My name is Brendan Kennelly. I serve as Executive Vice President and Chief Operating Officer of Minnkota Power Cooperative, Inc. in Grand Forks, North Dakota.

Q2. **Please state your educational and professional background.**

A2. I received a bachelor's degree in electrical engineering from the University of North Dakota in 2002 and received a Master of Business Administration from the Jack Welch Management Institute at Strayer University in 2017. I am a licensed professional engineer in North Dakota and Minnesota.

I have served on the advisory board of the School of Electrical Engineering and Computer Science at the University of North Dakota, and as member representative at the North American Transmission Forum. I also serve on the planning committee for the G&T Transmission Owner/Operator forum.

Q3. **What is your employment history and work experience with Minnkota?**

A3. I have been employed with Minnkota Power Cooperative for over 25 years with over a decade serving as part of the senior leadership team and as an executive leader since 2022. I started with Minnkota as a Project and Control Engineer in 2002, and after various supervisory roles, was promoted to Chief Operating Officer in April of 2025. My experience includes nearly all aspects of the design, maintenance, and management of electrical operations, power supply, and power delivery, including transmission line and substation planning and engineering and the large load interconnection process.

Q4. **Before we discuss the Agassiz Transmission Line and Substation Project (the "Project"), would you please describe Minnkota Power Cooperative?**

A4. Minnkota is a not-for-profit electric generational and transmission cooperative headquartered in Grand Forks, North Dakota. Formed in 1940, Minnkota provides wholesale electric energy to 11 member-owner distribution cooperatives located in eastern North Dakota and northwestern Minnesota. These members serve nearly 153,000 consumer accounts in a 34,500 square-mile area, including many of the region's homes, farms, schools and businesses. Minnkota

owns and operates approximately 3,400 miles of transmission line and 265 substation assets with approximately 40 of those substation assets being high voltage transmission, the same class as the proposed project. Since 2015, Minnkota has invested approximately $350 million into strengthening its power delivery system and addressing aging infrastructure.
Minnkota also serves as operating agent for the Northern Municipal Power Agency (NMPA). Headquartered in Thief River Falls, Minn., NMPA supplies the electric needs of 12 associated municipal utilities that serve more than 16,000 consumer accounts in the same geographic area as the Minnkota member-owners, including the cities of Grafton and Park River, North Dakota.

Q5. **Who controls Minnkota Power Cooperative?**

A5. Minnkota and its member-owner distribution cooperatives are owned by the individual members, that is the customers or consumers, of the distribution cooperatives. Minnkota's board of directors is composed of representatives from each of the distribution member cooperatives and NMPA.

Q6. **What are the business principles on which Minnkota operates?**

A6. Minnkota follows the cooperative business model, operating under the seven core principles and values: open and voluntary membership; democratic member control; member's economic participation; autonomy and independence; education, training, and information; cooperation among cooperatives; and concern for the community. Minnkota is committed to delivering safe, reliable, affordable and environmentally responsible electricity and since 1940, its mission is to keep its electricity the best energy value in the region.

Q7. **What will you discuss in your testimony today?**

A7. In my testimony, I will discuss Minnkota's large load interconnection policy, its process and the interconnection request received that led to this Project.

II. <u>Large Load Interconnection Policy and Process</u>

Q8. **Would you please provide a general description of a large load interconnection?**

A8. As energy use grows nationwide, more large-scale, high-energy demand businesses, such as advanced manufacturing facilities, data centers, and agricultural processing operations, are seeking reliable, long-term electric service. As a not-for-profit, Minnkota is committed to serving all members safely and reliably. Any new home or business built within the certified service territory of our member-owner distribution cooperatives is entitled to service. However, connecting a large commercial or industrial load to the electric grid requires significant coordination, careful planning and robust engineering support.

Q9. **Has Minnkota adopted any policies related to large load interconnection requests?**

A9. Yes. Our Transmission Planning Department has implemented a policy titled *MPC Generation and Transmission and End-Use Interconnection Requirements* to describe the requirements for interconnecting with the MPC system in an efficient and consistent manner to meet the requirements for the safe and reliable operation of the Interconnection. The requirements set forth in this document are intended to comply with Federal Energy Regulatory Commission (FERC) Orders 888, 889, and 890, all state and federal regulatory requirements, and the applicable requirements of entities such as North American Electric Reliability Corporation (NERC) having jurisdiction over electric system reliability requirements.

Q10. **Can you explain the Large Load Interconnection Process?**

A10. The process is divided into three (3) phases: (1) the application phase; (2) the system impact study; and (3) the facilities study followed by an electric services agreement (ESA) and/or facility construction agreement (FCA). During the application phase, the applicant provides the required technical information, and a scoping meeting occurs with Minnkota personnel and the applicant.

To proceed to the next phase, the applicant enters into an Interconnection Process Agreement and Membership Agreement and provides a study deposit and resource study fee. During the system impact study and facilities study phases, Minnkota evaluates how a proposed load interconnection may affect Minnkota's Generation and Transmission System, as well as any interconnected systems. This study ensures that all potential impacts are identified and mitigated, allowing for a

safe, efficient, and reliable interconnection. Our goal is to ensure that proposed projects proceed smoothly while maintaining the integrity and reliability of the overall system.

Q11. **Can you explain the interconnection request Minnkota received that led to the proposed Agassiz Transmission Line and Substation Project?**

A11. Minnkota was approached in July 2025 to go over the process and requirements for a new large load in Cass County, North Dakota. Following the system impact study and facilities study, the applicant committed to the necessary capital investment for the interconnection, including all required system upgrades such as the transmission line extension and substation development that will be networked onto Minnkota's system.

Q12. **Can you explain the capital investment requirement of Minnkota's Interconnection Polciy?**

A12. If new large-scale businesses or other large loads require additional generation capacity or local transmission or distribution infrastructure, that business is responsible for 100% of the interconnection and facility upgrade costs associated with serving its load.

Q13. **So Minnkota's member-owners, or the member-owners of the distribution cooperatives are not responsible for such costs?**

A13. That's correct. All costs related to the interconnection and facility upgrades are borne by the applicant.

Q14. **How was the location and route of Agassiz transmission line extension and associated substation developed?**

A14. The 345kV transmission line and substation are system upgrades necessary to serve the new large load interconnection request located just south of Harwood in Cass County, North Dakota. The existing infrastructure in the area cannot handle the amount of power requested by the interconnection applicant. There is an existing 345kV transmission line a little over a mile from the proposed building site of the interconnection applicant and it was determined that extending

this line to the proposed substation would create the least negative impacts and be more cost effective than other alternatives.

Q15. **How does this Project affect the reliability of the transmission system in eastern North Dakota?**

A15. This Project will not have any negative impact on the reliability of Minnkota's transmission system. This Project is being designed and developed at this time primarily because of the timing of the interconnection request and to meet the interconnection request. However, Minnkota as a generation and transmission company is in the business of developing assets that will meet the long-term needs of our member-distribution cooperatives. As such, in the design process, Minnkota takes into consideration long-range multi-generational value and impacts of these assets on our integrated transmission system. Accordingly, because the Project is not solely purposed for the interconnection request, the system upgrades are a net benefit to Minnkota's membership at no cost, ensuring the availability of reliable low-cost energy.

Q16. **Is the proposed location, construction, and operation of the Project such that it will ensure continued system reliability and integrity?**

A.16 Yes. The Project will support the interconnection request, existing system needs and increase transmission system capacity while meeting all reliability criteria, including NERC, our neighboring transmission providers, and the Midcontinent Independent System Operator(MISO). The process of establishing our satisfaction of all reliability criteria includes a transparent review of our transmission studies by these entities.

Q17. **Does the Project ensure that the energy needs of the area will be fulfilled in an orderly and timely fashion?**

A.17 Yes. And it satisfies our obligation to serve new homes and businesses built within the service territory of our member-owner cooperative.

Q18. **Are there any plans for expansion of this transmission line?**

A.18. There is no current plan to expand this transmission line beyond this Project, but as an open access transmission provider additional transmission assets may be needed in the area if electric load requirements continue to grow.

Q.19. **Does this conclude your testimony?**

A.19. Yes.