

1 Q. WHEN DETERMINING THE NEED FOR THE 345 kV FACILITIES PROPOSED IN
2 MINNESOTA, SHOULD THE MINNESOTA PUBLIC UTILITIES COMMISSION
3 (“COMMISSION”) BE EVALUATING ALL OF MVP PROJECT 3 OR JUST THE
4 PROJECT?

5 A. To evaluate the need for the Project, the Commission should consider the
6 Project separately, as a necessary part of MVP Project 3 and part of the
7 MVP Portfolio of 17 projects. The states of Minnesota and Iowa must
8 ultimately evaluate MVP Project 3 from Lakefield Junction throughout
9 southwest Minnesota and northwest Iowa. The segment of MVP Project 3
10 that ITC Midwest proposes to construct and own, the Project, by itself is
11 needed to address constraints in southwest Minnesota and to provide
12 transfer capability. The collective MVP Project 3 segments provide
13 additional benefits to Minnesota and [in conjunction with MVP Project 4,](#)
14 address additional needs in Iowa. The need for and benefits of the Project
15 must be evaluated in the context of MVP Project 3 and the entire MVP
16 Portfolio.

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18 Q. HOW SHOULD MVP PROJECT 4 AND MVP PROJECT 5 BE CONSIDERED?

19 A. The analyses provided demonstrate that MVP Project 3 is needed and
20 provides certain transfer capability and congestion relief that is further
21 enhanced with the addition of MVP Project 4 and MVP Project 5. MVP
22 Project 4, in particular, is closely linked with MVP Project 3 and builds
23 upon its benefits. However, regardless of whether MVP Project 4 or MVP
24 Project 5 is constructed, MVP Project 3 meets demonstrated needs in
25 Minnesota, Iowa, and the region.

1 Q. DO YOU BELIEVE ANY FURTHER INVESTIGATION OF THE LAKEFIELD -
2 RUTLAND 345 kV ALTERNATIVE IS WARRANTED?

3 A. No. Its performance is clearly inferior to MVP Project 3 and the 161 kV
4 Rebuild Alternative. No further analysis is justified.

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6 V. CONCLUSION

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8 Q. DO YOU CONTINUE TO RECOMMEND THAT THE COMMISSION GRANT A
9 CERTIFICATE OF NEED FOR THE PROJECT?

10 | A. Yes. The Project alone, [with the other segments of MVP Project 3](#) and in
11 connection with MVP Project 4 and the rest of the MVP Portfolio addresses
12 multiple local and regional needs.

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14 Q. DOES THIS COMPLETE YOUR REBUTTAL TESTIMONY?

15 A. Yes.

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