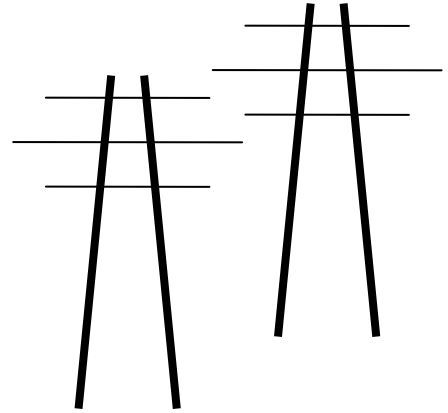


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December 15, 2014

Burl Haar, Executive Secretary
Minnesota Public Utilities Commission
121 – 7th Place East, Suite 350
St. Paul, MN 55101

eFiled and eServed

RE: No CapX 2020 - Motion for Reconsideration
PUC Docket No.: ET-6675/CN-12-1053
In the Matter of the Application of ITC Midwest LLC for a Certificate of Need for the
Minnesota-Iowa 345 kV Transmission Line Project in Jackson, Martin, and Faribault
Counties

Dear Dr. Haar:

Enclosed, eFiled and eServed, please find Motion for Reconsideration in the above-entitled matter.

Please let me know if you have any questions or require anything further.

Very truly yours,

Carol A. Overland
Attorney at Law

cc: No CapX 2020

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

**Beverly Jones Heydinger
David C. Boyd
Nancy Lange
Dan Lipschultz
Betsy Wergin**

**Chair
Commissioner
Commissioner
Commissioner
Commissioner**

In the Matter of the Application of ITC
Midwest LLC for a Certificate of Need for the
Minnesota-Iowa 345 kV Transmission Line
Project in Jackson, Martin, and Faribault Counties

PUC Docket No.: ET-6675/CN-12-1053

NO CAPX 2020 MOTION FOR RECONSIDERATION

NoCapX 2020, intervenors in the above-captioned docket bring this Motion for Reconsideration of the Commission's decision to grant the ITC Midwest, LLC MN/IA transmission project a Certificate of Need at its agenda meeting on October 23, 2014 and by written Order filed on November 10, 2014. Minn. R. 7829.3000; Minn. Stat. §216B.25; Minn. Stat. §216B.27. No CapX 2020 requests the Commission reconsider its decision and amend its Order to reflect that ITC Midwest is not a public service corporation, and to address the larger picture of Minnesota ratepayer responsibility for the apportioned costs of the \$5.8 billion MVP 17 project portfolio.

In this case, the Commission's decision to amend the permit was not deliberated and was not well-considered. This is a case of first impression in Minnesota, where a transmission-only company Applicant has requested a Certificate of Need and Routing Permit. ITC Midwest, LLC, is not a public service corporation – it provides no public service, has no service territory or native load. Instead it is a company that builds and operates transmission lines and provides

transmission service for profit. A Certificate of Need is a necessary step toward acquiring land through eminent domain, and in Minnesota, eminent domain is not to be used for a private purpose. The decision is arbitrary and capricious because it entirely failed to consider the importance of its declaration that ITC Midwest was a “public service corporation,” and what that precedent means to Minnesota ratepayers and landowners, and the impact of the Commission’s decision considering the constitutional prohibition of a taking for a private purpose.

This decision is also an issue of first impression where a Certificate of Need is requested for a MISO MVP economic project,¹ one which is a segmented portion of MVP 3, of the 17 project MVP “portfolio” extending across the region. The Commission should reconsider its decision because Minnesota will have a much higher cost than just this portion of MVP 3 because all of the costs of the MISO 17 project MVP Portfolio will be assessed to Minnesota ratepayers.

The Commission should reconsider its grant of a Certificate of Need to ITC Midwest, and amend its order to reflect that ITC Midwest is not a “public service corporation” as defined by the laws of the State of Minnesota, and should consider the impact on ratepayers of the full costs of the MISO 17 project MVP Portfolio.

I. ITC MIDWEST, LLC, IS NOT A PUBLIC SERVICE CORPORATION

The Commission’s adoption of the Administrative Law Judge’s Recommendation included the very first Finding of Fact, that ITC Midwest, LLC was a “public service corporation.” ITC will need to acquire additional right-of-way for this project, and how that land might be acquired is an issue to be considered. The Commission’s adoption of this Finding, as

¹ The CapX 2020 Brookings-Hampton transmission line was deemed a “MVP” project after the fact, years after the Certificate of Need was granted.

an issue of first impression, is particularly important precedent to condemnation proceedings for this and other projects.

This court grants “great deference to the initial legislative determination that a particular project serves a public purpose.” *R.E. Short Co.*, 269 N.W.2d at 337. Regarding the necessity requirement, the requisite necessity is not absolute necessity, but rather it is sufficient to find that “the proposed taking is reasonably necessary or convenient for the furtherance of a proper purpose.” *City of Duluth*, 390 N.W.2d at 764-65.

Lino Lakes Economic Development Authority v. Reiling, 610 N.W. 2d, 355, 357 (Minn. Ct. App., 2000).

The MVP 17 project portfolio is MISO’s promotional business plan to enable marketing of low-cost electricity from the Dakotas in the northwest to Madison/Milwaukee, Illinois, and beyond. A marketing plan is not need, and desire to gain financially by increasing marketing range is not need, lowering production costs is not need, nor is desire for a return of 12.38% on the capital costs of transmission construction need. Applicants claim a need for this project, but a legally cognizable “need” has not been defined or demonstrated. The Commission should consider the policy ramifications and should not enable acquisition of land for a private purpose by ITC Midwest LLC through eminent domain condemnation.

The Commission’s adoption of the Administrative Law Judge’s FoF 1,² where the ALJ copied verbatim the Applicant’s revised Finding of Fact, including the Finding that ITC Midwest, LLC, is a “public service corporation.” This is a false statement.

1. ITC Midwest is a transmission-only utility that owns approximately 6,600 circuit miles of transmission lines and more than 200 transmission substations in Iowa, Minnesota, Illinois, and Missouri. ITC Midwest is a Minnesota “public service corporation”, a “transmission company” and “utility” under state law.¹ ITC Midwest is also a “public utility” under the Federal Power Act.²

¹ Minn. Stat. §§ 301B.01, 216B.02, subd. 10; 216E.01, subd. 10.

² ALJ Recommendation, p. 2-3.

ALJ Recommendation, p. 2-3 (**emphasis added**). ITC Midwest, LLC, is NOT a “Minnesota public service corporation” under Minnesota law.

Applicant ITC Midwest, LLC is NOT a Minnesota “public service corporation.” ITC Midwest, LLC, is a private limited liability company organized under Minn. Stat. Ch. 322B³. It is a transmission only company, which has the sole purpose of construction and operation of transmission for profit. ITC Midwest, LLC, provides transmission services for utilities, independent power producers, electric market traders and others utilizing transmission services. ITC Midwest, LLC, does not have a franchise to provide electricity to the public, it has no service territory, and it has no public purpose.

PUC Staff Briefing papers brushed off this concern, stating:

ITC Midwest, under Minn. Stat. § 216E.01, subd. 10, is, “[an] entity engaged or intending to engage in this state in the generation, transmission, or distribution of electric energy including, but not limited to, a private investor-owned utility, cooperatively owned utility, and a public or municipally owned utility.” Thereby, under Minn. Stat. § 216E.12, subd. 1, “The power of eminent domain shall continue to exist for utilities and may be used according to law to accomplish any of the purposes and objectives of [Chapter 216E], including acquisition of the right to utilize existing high-voltage transmission facilities which are capable of expansion or modification to accommodate both existing and proposed conductors.”

PUC Staff Briefing Papers, p. 14. This statement, citing 216E, the Routing chapter, does not address the specifics and as the routing chapter, is not applicable. Staff did not address concerns and citations raised below, or the conflict in the routing statute and rules. See Minn. R. 7850.1000, Subp. 20; *but see* Minn. Stat. §216E.01, Subd. 10, below.

This error in the Findings of Fact is significant because it is through a grant of a “Certificate of Need” that the “need” required for a public service corporation to condemn land is conferred. For purposes of eminent domain, the Certificate of Need deems infrastructure is

³ Details of ITC Midwest, LLC’s organizational filings at the Minnesota Secretary of State’s Office are available online: <http://mblsportal.sos.state.mn.us/Business/SearchDetails?filingGuid=e2b736fa-90d4-e011-a886-001ec94ffe7f>

needed and with that need demonstration, a “public service corporation” can condemn land for transmission easements. An LLC organized under Minn. Stat. Ch. 322B does not have authority to exercise the power of eminent domain to take land -- only a public service corporation has the power of eminent domain.

... The corporation may acquire by power of eminent domain the private property necessary or convenient for the transaction of the public business for which it was formed...

Minn. Stat. § 302B.02 (from Minn. Stat. Ch. 302B, Public Service Corporations).

Under the laws of the state of Minnesota, land may not be condemned for a private purpose such as the private purpose of ITC Midwest, LLC:

Requirement of public use or public purpose. Eminent domain may only be used for a public use or public purpose.

Minn. Stat. §117.012, Subd. 2.

This public use requirement is set out more specifically in the Eminent Domain definitions, and expressly limited to “public service corporations” in this section:

Public use; public purpose.

- (a) "Public use" or "public purpose" means, exclusively:
 - (1) the possession, occupation, ownership, and enjoyment of the land by the general public, or by public agencies;
 - (2) the creation or functioning of a public service corporation;** or
 - (3) mitigation of a blighted area, remediation of an environmentally contaminated area, reduction of abandoned property, or removal of a public nuisance.
- (b) The public benefits of economic development, including an increase in tax base, tax revenues, employment, or general economic health, do not by themselves constitute a public use or public purpose.

Minn. Stat. §117.025, Subd. 11 (emphasis added).

Although this is a Certificate of Need issue, it should be noted that there is a conflict between the Power Plant Siting Act (PPSA) statute and rules, and the rules go beyond the authority of the statute. While a “transmission only” company could arguably be regarded as a “utility” under

the PPSA rules, Minn. R. 7850,1000, Subp. 20, an LLC is not included in the definition of utilities found in Minn. Stat. §216E.01, Subd. 10:

"Utility" shall mean any entity engaged or intending to engage in this state in the generation, transmission, or distribution of electric energy including, but not limited to, a private investor-owned utility, cooperatively owned utility, and a public or municipally owned utility.

Minn. Stat. §216E.01, Subd. 10. There is no statutory authority for the addition of transmission companies to the definition of “utility” in Minnesota Rules. The definition of “transmission companies” cited by the ALJ specifically separates and distinguishes between “transmission companies” and excludes “transmission companies” from consideration as utilities:

Transmission company. "Transmission company" means persons, corporations, or other legal entities and their lessees, trustees, and receivers, engaged in the business of owning, operating, maintaining, or controlling in this state equipment or facilities for furnishing electric transmission service in Minnesota, *but does not include public utilities, municipal electric utilities, municipal power agencies, cooperative electric associations, or generation and transmission cooperative power associations.*

Minn. Stat. §216B.02, Subd. 10 (emphasis added).

In its deliberations, the Commission did not consider whether ITC Midwest was a “public service corporation” nor did it consider the impact of such a determination. The Commission often comments that it does not address eminent domain issues, that is a separate venue, and if that is the case, the Commission should not be making as monumental policy statement as a declaration that a company is or is not a “public service corporation.” The statement in the ALJ’s Finding of Fact 1 that Applicant ITC Midwest, LLC, is a Public Service Corporation is incorrect under Minn. Stat. Ch. 216B, Ch. 216E, and Ch. 302, and that part of the Finding of Fact must be removed. The impact of such a statement on the status of ITC Midwest, LLC, in eminent domain proceedings, and even in land acquisition negotiations must be acknowledged by the Commission, and that improper Finding be deleted from the Order.

II. MISO'S \$5.8 BILLION MVP PORTFOLIO COST IS EXHORBITANT WITH EXTREME IMPACT ON RATEPAYERS AND LITTLE BENEFIT FOR THIS PROJECT THAT'S JUST A PORTION OF MVP 3.

In its decision, the Commission did not address the cost of the MVP Portfolio to Minnesota ratepayers, nor did it address that all the projects need to be built to have any hope of achieving the full benefit package claimed by Applicants. Commissioner Boyd did acknowledge the need to consider these issues, with nods of agreement across the bench, but there is no means established for this to be considered! The Commission must set review in motion, and not approve projects with impacts to be considered “later.” That is not in the public interest.

Transmission infrastructure has a decades-long lifespan, and any decision at this point will affect energy choices through the infrastructure's life, and ours. Minnesotans will be paying a share of a 17 project portfolio, one that is claiming a vast tally of economic benefits that are dependent on construction of all 17 projects. The rate recovery scheme for transmission has changed from an historical requirement that generators pay for necessary upgrades to a ratepayer pay scheme set by MISO member utilities, promoted by MISO to FERC, and approved by FERC, cutting the state regulatory agencies out of the mix.

This particular project's cost will be paid by utilities utilizing the wholesale transfer services provided by these projects via ITC Midwest. Minnesotans' share is estimated to be 13.3% of the MVP 17 project portfolio capital costs of \$5,821,866,035, or roughly \$774,308,182.65 for Minnesota, but the Applicant would not commit to a cost estimate. In addition to these FERC set capital costs, transmission service costs for services utilized would be an additional ratepayer burden to anyone receiving electricity over these lines. Thus, the Commission's grant of a Certificate of Need and a Route Permit for this project, and the terms of the Commission's decision, have significant policy implications for ratepayers.

In its review of this project, the Commission was been asked by Applicants to take into account a range of benefits, from those of MVP 3 and 4 to claimed benefits achieved only with the full 17 MVP Portfolio. Yet in consideration of the range of benefits, the Commission should take into account the full range of costs and impacts associated with not “just” MVP projects 3 and 4, or 3, 4 and 5, but also the full range of \$5,821,866,035 of MVP costs and the associated environmental costs. This has not happened, and there is nothing in place to assure that this review does occur.

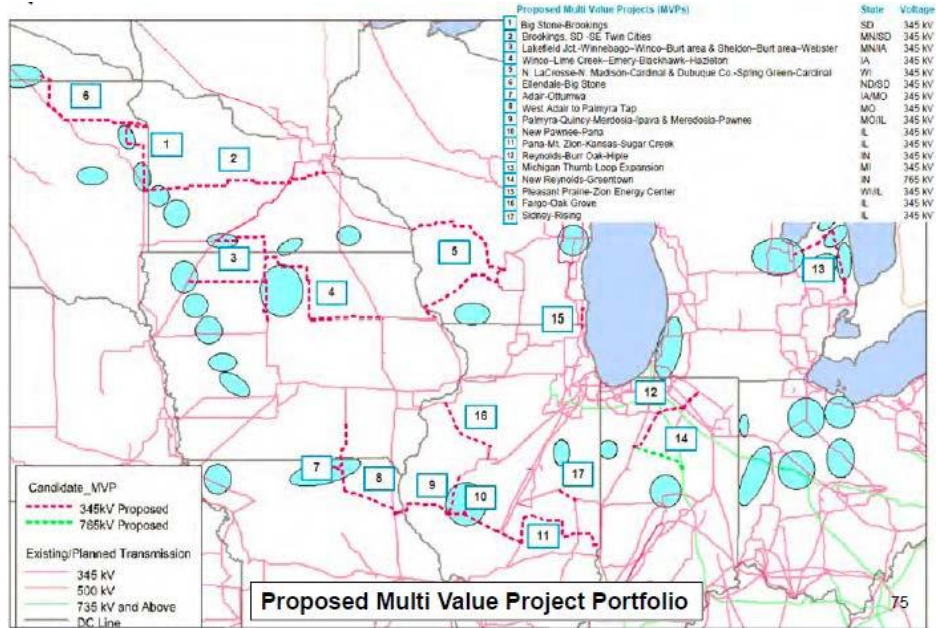
The project cost of the project was estimated at \$194-206 million for the ITC MN portion of MVP 3 in the Application, later at \$273-285; initially \$271-283 million for all of MVP 3; \$1,710-1,868 for MVP 3 & 4; \$5,214-5,821 for the 17 MVP Portfolio; and \$8,789-16,407 when totaling revenue requirements for the 17 MVP projects. Again, there is no cost commitment.

This ITC MN/IA project is but a small part of a phased and connected action, part of a large portfolio of projects that will admittedly enable transmission of baseload generation through Minnesota to distant markets, contravening Minnesota energy policy; a project where the cost estimate is not reasonably assured to be accurate; and a project where benefits of multiple projects are claimed and all projects are required for benefits to accrue, but where the costs attributed to the project are only to a very small part.

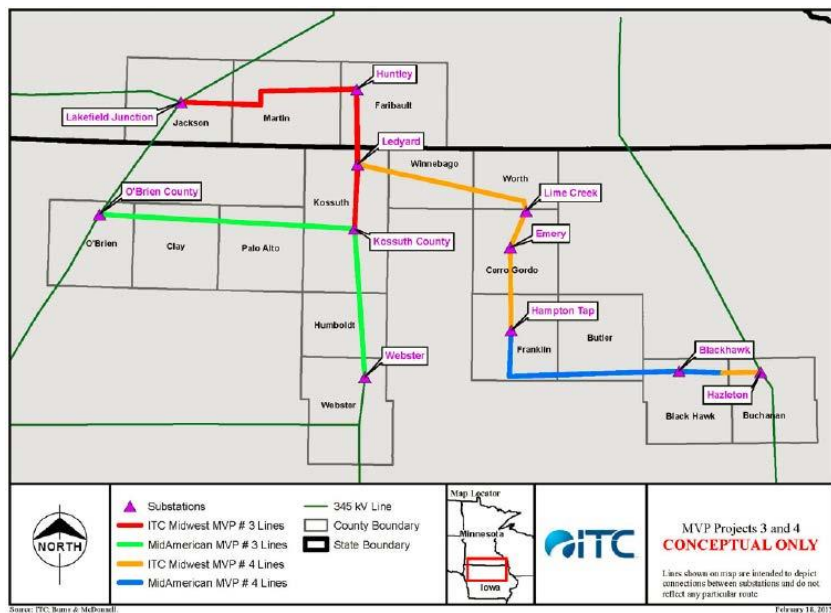
MISO’s 17 project MVP Portfolio is all about money. The criteria used by MISO to develop the portfolio of projects is economic based, using economic modeling, much different than Minnesota’s criteria for determining need. Ex. 6, Application, Appendix I, MTEP 11, p. 49, but *c.f.* Minn. Stat. 216B.243, Subd. 3. MISO’s MTEP 11 establishment of these MVP projects muddies the jurisdictional waters by layering an “approval” by a private entity over state jurisdiction. MISO’s purpose in establishing MVP projects is to coordinate with existing

infrastructure and supporting a variety of different generation fuel sources to provide economic benefits and to beef up the system to enable delivery across the MISO region. Id., p. 7.

This project is part of MVP 3, directly connected to MVP 4, MVP 5, and is one of seventeen “Multi Value Projects” established by MISO in MTEP 11 that link with the extra high voltage (EHV) system to carry electricity from the Dakotas to Illinois and beyond:



Ex. 6, Application, Appendix I, p. 7.



Ex. 6, Application, p. 2, Map of MVP 3 and 4.

The part at issue in this Minnesota proceeding is the part of the red line on the above map from Jackson, Minnesota to the IA border. MVP 3 is divided with roughly one-third in Minnesota and two-thirds in Iowa, and ownership is divided 50/50 between ITC Midwest and Mid American. MVP 3 is shaped like a backwards “F” with parallel lines drawing in from the 345 kV connections to the west like a tuning fork, running easterly, and then a connecting line running north/south.

MVP 4, linked and to be considered with MVP 3, then runs eastward from MVP 3, and connects into the existing 345 kV transmission in Iowa, and which then connects to MVP 5, extending further east. See Ex. 30, corrected Collins Rebuttal, p. 15, l. 17. MVP 5 is in part the Badger Coulee line from La Crosse to Madison, Wisconsin. MVP 5 is the part connecting MVP 3 and MVP 4 and existing Iowa transmission to Madison, Milwaukee, Chicago and eastward.

This MN/IA 345 kV project is designed as a for-profit private purpose line needed to “remove Minnesota and regional transmission system constraints which currently limit the ability to reliably deliver generation throughout the MISO footprint,” to “enhance the regional electrical system, and “contribute to a portfolio of regional projects with significant reliability, economic, and public policy benefits in Minnesota and the greater region. Ex. 6, Application, p. 7, p. 1; p. 15. ‘ITC Midwest is not a retail load serving entity.’” Id., p. 16. This project is a part of the 17 project MVP Portfolio established by MISO in MTEP 11, with a strategy focused on:

Regional transmission, such as the transmission in the proposed MVP portfolio, increases reliability in the MISO footprint, opens the market to increased competition and provides **access to low cost generation, regardless of fuel type.**

Ex. 6, Application, Appendix I, MTEP 11, p. 51.

The MVP economic benefits are taken as a whole, based upon PROMOD modeling presuming all 17 projects are approved and constructed, include a number of drivers:

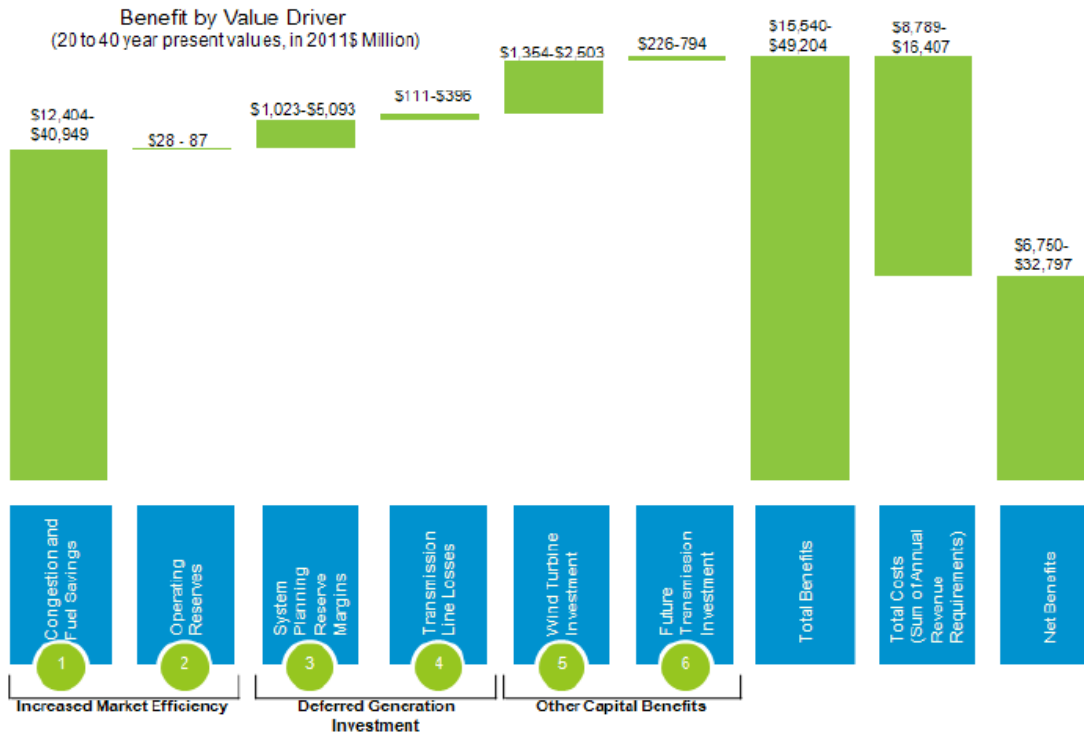


Figure 4.1-13: Proposed MVP portfolio economic benefits

However, on its own, MVP 3 provides little in the way of benefits, and the project at issue in this docket is just a part of MVP 3, and provides even less in the way of directly attributable benefits. Commerce Information Requests produced information that demonstrated the interrelation and interdependence of the projects on each other, and that for MVP 3 (remember, this project is just a part of MVP3) to provide benefits, MVP 4 and MVP 5 must be built. The PROMOD modeling assumes in its study case that all 17 MVPs are inservice.

In one base case (Base Case), all 17 projects in the MVP portfolio except MVPs 3 and 4 are assumed to be in service. In the second base case (No MVP 5 Base Case), all 17 projects in the MVP portfolio except MVPs 3, 4 and 5 are assumed to be in service. Changes in average LMPs and the Minnesota Avg LMP – together or separately sometimes referred to as “LMP impacts” – are calculated between each base case and three “study cases”.

Ex. 33, Schatzki Rebuttal, p. 9; see also Schedule 2, p. 9 of 36.⁴

⁴ The results of this PROMOD modeling, Schatzki Rebuttal, Schedule 2, are found inserted after this page.

Where are the benefits? The locational marginal price analysis is found in Tables 2 through 4, with Table 2 being a summary, and Table 3 and 4 the itemized LMPs for the Business as Usual: High Demand and Business as Usual: Low Demand sensitivities. Id., pps. 15-19. The results of this modeling is mixed, particularly when looking at the itemizations. In the summary, in all cases, the LMP change due to MVP 3 only is negligible, and in the BAU without MVP 5, it shows a small cost in the 2026 outyear.

The production cost analysis is found in Tables 8 and 9 Id., p. 25-26. In Table 8, “MISO Production Cost Changes from MVPs 3 and 4” the annual MISO production cost change with MVP 5 is shown for “Cost Change Due to MVP 3 only” as a difference ranging from -0.2% to -0.3%, and “Cost Change Due to MVPs 3 and 4” as ranging from 0.8% to 0.9%. Without MVP 5, “Cost Change Due to MVP 3 only” ranges from -0.4 to -0.5% and “Cost Change Due to MVPs 3 and 4” as ranging from 0.7% to 0.9%. These results are for the entire MISO footprint and are negligible. There is no breakdown of benefit to Minnesota. What small percentage is shown as a benefit is for the entire MISO footprint, and there is no benefit demonstrated for Minnesota.

In Table 9, “MISO Production Cost per MWh Load Changes from MVPs 3 and 4” the annual MISO production cost per MWh load change with MVP 5 is shown for “Cost Change Due to MVP 3 only” as a difference ranging from -0.2% to -0.3%, and “Cost Change Due to MVPs 3 and 4” as ranging from 0.8% to 0.9%. Without MVP 5, “Cost Change Due to MVP 3 only” ranges from -0.4 to -0.5% and “Cost Change Due to MVPs 3 and 4” as ranging from 0.7% to 0.9%. Again, these results are for the entire MISO footprint and are negligible. There is no breakdown of benefit to Minnesota. What small percentage is shown as a benefit is for the entire MISO footprint, and there is no benefit demonstrated specifically for Minnesota.

The application also establishes that it is not about Minnesota, or even regional, market, showing that there is no shortage of electricity to go around:

Reserve margin	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021
Reserve margin (MW)	23,930	22,438	22,064	21,368	20,760	20,065	19,287	19,950	19,031	18,032
Reserve margin (percent)	27.0	24.8	24.2	23.3	22.5	21.5	20.5	21.0	19.9	18.6
Planning reserve margin requirement (percent)	17.4	17.3	17.3	17.2	17.4	17.8	17.8	18	18.2	18.2

Table 1.2: 2012-2021 forecasted reserves

Ex. 6, Application, Appendix I, MTEP 11, p. 9.

The MTEP 11 transmission projects, including the MVP 17 project portfolio and this ITC MN/IA transmission line is not “for wind,” first, because under FERC regulations, transmission service may not discriminate among users in any way, including fuel type. The proposed projects in MTEP, if built, increase wind generation by 6.74% but there’s only a infinitesimal 0.85% decrease in coal capacity factor:

		Generation (MWH)	Capacity Factor
Combined Cycle	No Appendix projects.	25,267,913	21.22 percent
	With Appendix projects.	20,804,817	17.47 percent
	Change	-4,463,096	-3.75 percent
CT Gas	No Appendix projects.	3,252,613	1.61 percent
	With Appendix projects.	2,352,304	1.16 percent
	Change	-900,309	-0.45 percent
CT Oil	No Appendix projects.	68,820	0.16 percent
	With Appendix projects.	15,908	0.04 percent
	Change	-52,913	-0.12 percent
Hydro	No Appendix projects.	3,744,454	34.25 percent
	With Appendix projects.	3,744,116	34.25 percent
	Change	-338	0.00 percent
IGCC	No Appendix projects.	5,860,686	76.29 percent
	With Appendix projects.	5,854,798	76.21 percent
	Change	-5,888	-0.08 percent
Nuclear	No Appendix projects.	71,312,762	88.91 percent
	With Appendix projects.	71,312,762	88.91 percent
	Change	0	0.00 percent
ST Coal	No Appendix projects.	383,096,341	68.34 percent
	With Appendix projects.	378,307,444	67.49 percent
	Change	-4,788,897	-0.85 percent
ST Gas	No Appendix projects.	708,331	2.86 percent
	With Appendix projects.	453,482	1.83 percent
	Change	-254,849	-1.03 percent
ST Oil	No Appendix projects.	12,209	0.24 percent
	With Appendix projects.	12,399	0.24 percent
	Change	189	0.00 percent
Wind	No Appendix Projects	42,108,491	27.99 percent
	With Appendix Projects	52,251,508	34.73 percent
	Change	10,143,018	6.74 percent

Table 2.5-6: 2016 generation and capacity factor change for different type units

This project and the entire 17 project MISO MVP Portfolio, at -0.85% decrease, will have a negligible impact on decrease. The failure of the MVP Portfolio to decrease coal generation is supported by MISO's witness Chatterjee, who clarified that the purpose of the MVP projects is baseload unit transfer capacity:

You're trying to move capacity resources or, capital P, capital R, planning resources. These are baseload units that you're moving from local resource zone one for utilization in all of the other MISO local resource zones for every load to meet their local -- to meet their planning reserve margin requirement.

So you know how much you need and you know what you're transferring, you're transferring capacity resources, baseload units, and wind also, but wind has a very small capacity credit value. And we identified a significant benefit there. So that is an important context.

MISO's Chatterjee, Tr. p. 94-95.

The purpose of this build-out is to add to the existing and under construction transmission web and ship electricity from where there is a surplus to where there is a market with higher prices. See Ex. 6, Application, App. I, MTEP 11.

The Applicants claim that "MVP Project 3 and MVP Project 4 will result in lower cost energy for Minnesota consumers, and that:

... construction of these two MVP projects will cause the average Minnesota LMP to drop by \$0.61 and \$0.70 per megawatt hour ("MWh") in 2021, depending on studied market conditions. In 2026, the reductions are \$0.71 and \$0.090 per MWh depending on market conditions. For Minnesota, these LMP reductions result in a reduction in annual LMP payments of between \$48.3 million to \$76.6 million across the cases evaluated.

Ex. 6, Application, p. 8; Appendix M.

However, in this case, consideration of costs has many layers. MVP 3 is just one of the 17 projects in the MISO MVP Portfolio. Applicants testify that benefits of MVP 3 and 4 must be considered in this case, and that the project portion of MVP 3 and MVP 3 cannot be considered in a vacuum. Ex. 30, corrected Collins Rebuttal, p. 15, l. 17; Ex. 29, Berry Rebuttal, pps. 5 & 31.

All 17 projects were part of the MVP modeling, and for the claimed benefits of the Multi Value Portfolio projects to be realized, all 17 of the projects must be built. Ex. 6, Application, Appendix I, MTEP 11, p. 1, 42-75. Applicants acknowledge the interwoven nature of these 17 projects and testify that:

The Commission should consider all of the costs and benefits of the MISO 17 project MVP Portfolio as a part of this proceeding, since MVP Project 3 was studied by MISO as part of the larger portfolio of projects.

Ex. 31, Grover Rebuttal, p. 3, l. 8-11; see also Ex. 203, Johnson, p. 7;

The 17 MVP projects were estimated to cost a total, in 2011 dollars, of \$5.197 billion:

	Project	State	Voltage (kV)	In Service Year	Cost (M, 2011\$) ²⁸
1	Big Stone–Brookings	SD	345	2017	\$191
2	Brookings, SD–SE Twin Cities	MN/SD	345	2015	\$695
3	Lakefield Jct. Winnebago–Winco–Burt area & Sheldon–Burt area–Webster	MN/IA	345	2016	\$506
4	Winco–Lime Creek–Emery–Black Hawk–Hazleton	IA	345	2015	\$480
5	N. LaCrosse–N. Madison–Cardinal & Dubuque Co.–Spring Green–Cardinal	WI	345	2018/2020	\$714
6	Ellendale–Big Stone	ND/SD	345	2019	\$261
7	Adair–Ottumwa	IA/MO	345	2017	\$152
8	Adair–Palmyra Tap	MO/IL	345	2018	\$98
9	Palmyra Tap–Quincy–Meredosia–Ipava & Meredosia–Pawnee	IL	345	2016/2017	\$392
10	Pawnee–Pana	IL	345	2018	\$88
11	Pana–Mt. Zion–Kansas–Sugar Creek	IL/IN	345	2018/2019	\$284
12	Reynolds–Burr Oak–Hiple	IN	345	2019	\$271
13	Michigan Thumb Loop expansion	MI	345	2015	\$510
14	Reynolds–Greentown	IN	765	2018	\$245
15	Pleasant Prairie–Zion Energy Center	WI/IL	345	2014	\$26
16	Fargo–Galesburg–Oak Grove	IL	345	2018	\$193
17	Sidney–Rising	IL	345	2016	\$90
Total					\$5,197

Table 4.1-1: Proposed MVP portfolio

Ex. 6, Application, Appendix I, MTEP 11 Table 4.1-1. Since this chart was published, Schedule 26A shows that costs have increased on all but MVP 4, from Winco to Hazelton, which has dropped to roughly \$464 million:

Figure 1. Approved MVPs

Project ID	Project Name	Geographic Location by TO Member System	Estimated In-Service Date of Complete Project	Estimated Project Cost (in Nominal Dollars)
[1]	[2]	[3]	[4]	[5]
1203	Brookings, SD - SE Twin Cities 345 kV	XEL/GRE/OTP/MRES/C MMPA (represents TO ownership)	12/26/2014	\$639,873,000
2202	Reynolds to Greentown 765 kV line	Pioneer, NIPS	6/1/2018	\$328,708,150
2220	Ellendale to Big Stone South	OTP, MDU	12/31/2019	\$395,670,000
2221	Big Stone South to Brookings	OTP, NSP	9/30/2017	\$226,720,000
2237	Pana - Mt. Zion - Kansas - Sugar Creek 345 kV line	AMIL	11/15/2019	\$354,737,600
2239	Sidney to Rising 345 kV line	AMIL	11/15/2016	\$66,322,958
2248	Adair - Ottumwa 345	AMMO, ITCM, MEC	11/15/2018	\$178,230,921
2844	Pleasant Prairie-Zion Energy Center 345 kV line	ATC	12/31/2013	\$34,175,000
3017	Palmyra Tap -Quincy-Meredosia - Ipava & Meredosia-Pawnee 345 kV Line	AMIL	11/15/2017	\$505,692,729
3022	Fargo-Galesburg-Oak Grove 345 kV Line	AMIL, MEC	11/15/2018	\$225,524,474
3127	N LaCrosse-N Madison-Cardinal -Spring Green - Dubuque area 345-kV	ATC, NSP, ITCM	12/31/2018	\$863,032,583
3168	Michigan Thumb Wind Zone	ITC	12/31/2015	\$510,000,000
3169	Pawnee to Pana - 345 kV Line	AMIL	11/15/2018	\$108,600,381
3170	Adair-Palmyra Tap 345 kV Line	AMMO	11/15/2018	\$108,110,058
3203	Reynolds to Burr Oak to Hipple 345 kV	NIPS	12/31/2019	\$271,000,000
3205	Lakefield Jct. - Winnebago - Winco - Burt area & Sheldon - Burt Area - Webster 345 kV line	MEC, ITCM	6/1/2018	\$541,119,569
3213	Winco to Hazelton 345 kV line	MEC, ITCM	12/31/2018	\$464,348,611
			Total	\$5,821,866,035

Applicants state the costs of “ITC Midwest Estimated Cost for the Minnesota Portion of the MN-IA Project” is \$194-206 million, that part of MVP 3 from Lakefield Junction to the Minnesota border. Ex. 6, Application, p. 29. There is no substation at the Minnesota – Iowa border. Applicants state the costs from the border to the Kossuth County substation is an additional \$77 million, plus/minus 30%. Id. Commerce witness Johnson requested the entire MVP 3 cost be considered, increased to \$273-285 million for the project. ITC does not agree to a cap of \$283 million. Ex. 30, Collins Rebuttal p. 16-17; Ex. 204, Johnson Surrebuttal, p. 5.

MVP 3 in 2011 dollars is estimated to cost \$511 million, up from \$506 million in MTEP 11. Revised, see also Ex. 6, Application, Appendix I, MTEP 11 Table 4.1-1.

Project Description	Cost
MN/IA Lakefield Jct. to Iowa border	194-206
IA border to Kossuth substation	77
ITC part of MVP 3 – Lakefield Jct. to Kossuth	271 - 283
MVP 3	511 - 541
MVP 3 and 4	996 - 1,005
MVP 3, 4 and 5 (from App. I & Schedule 26A)	1,710 - 1,868
MVP Portfolio – all 17 required for “benefits”	5,214 - 5,821
Total of revenue requirements - MTEP	8,789 – 16,407

ITC Midwest will reap a 12.38% rate of return, set in a MISO tariff and approved by

FERC:

MR. DAVE GROVER: Yeah. ITC is a transmission company and our rates are regulated by the Federal Energy Regulatory Commission. That's in contrast to local vertically integrated utilities, like Interstate Power & Light or Xcel Energy, who also are, you know, publicly-owned, investor-owned utilities that have their rates regulated. And typical utility rate regulation models, utilities earn a return on their rate base and they are granted a rate of return on the equity portion of investment in the rate base.

*So I know this is complicated stuff that probably people don't think about, but, I mean, we have a return on equity in our FERC rate of **12.38 percent**, I believe is the number.*

MR. MAYNARD JAGODZINSKE: Pardon? One more time?

*MR. DAVE GROVER: On the equity portion of investment in rate base, we have a FERC-granted rate of return, or a return on equity, rather, of **12.38 percent**.*

Tr. p. 185-186 (emphasis added); see also MISO Tariff MM and Schedule 26A.

The cost to Minnesota ratepayers is at issue. ITC Midwest claims that:

Based on an estimated MN-IA Project cost of \$283 million and the MISO cost allocation methodologies, the estimated first year Project revenue requirement to be collected from Minnesota energy customers would be approximately \$7 million for the ITC Midwest portion of MVP Project 3.

Ex. 6, Application, p. 7; Appendix E. The total, when revenue requirements are tallied, would be much higher. ITC's Grover states that Minnesota customer load will pay approximately 13.3% of all MVP Portfolio project costs. Ex. 31, Grover Rebuttal, p. 3-4. 13.3 percent of all MVP Portfolio project costs, whichever project cost figure is used, is significantly more than \$7 million. Using the 2013 Schedule 26A MVP Portfolio total of \$5,821,000,000.00, 13.3% of that cost is \$774,193,000.00 for Minnesota ratepayers.

Commerce witnesses all pointed out significant problems with the cost estimates and failure to produce one number as the firm “cost” of the project. Ex. 205, Rakow Direct, p. 19-29; Ex. 203 and 204, Johnson Direct and Surrebuttal and Attachments.

The Commission does not have sufficient information to determine the cost of this project. There are too many cost estimates floating in this docket to pin down. ITC Midwest has not produced a reliable cost estimate, and the inconsistencies have not been clarified. This project should not be considered for a Certificate of Need without a reliable cost estimate.

III. THE COMMISSION SHOULD RECONSIDER ITS CERTIFICATE OF NEED DECISION, REJECT THE FINDING THAT ITC MIDWEST IS A PUBLIC SERVICE CORPORATION AND ADDRESS THE SIGNIFICANT COST TO RATEPAYERS OF THE MISO 17 PROJECT MVP PORTFOLIO

In this case of first impression in Minnesota, where a transmission-only company Applicant has requested a Certificate of Need and Routing Permit for a segmented portion of a multi-project “portfolio” project extending across the region, No CapX 2020 request that these Applications be denied. Review and analysis of the project should consider all of the costs and benefits of the MISO 17 project MVP Portfolio as a part of this proceeding. Because the MVP 17 project portfolio is nothing more than MISO’s promotional business plan to enable marketing of low-cost electricity from the Dakotas in the northwest to Madison/Milwaukee, Illinois, and beyond, it is not a justification for a Certificate of Need. A marketing plan, desire to gain financially by increasing marketing range, lowering production costs, or a return of 12.38% on the capital costs of transmission construction do not constitute need under Minnesota’s Certificate of Need criteria.

The Commission should consider the policy ramifications and should not enable acquisition of land for a private purpose by ITC Midwest LLC through eminent domain condemnation.

Other than that the Routing Permit should be denied, CETF and No CapX 2020 take no position as to the route of the project.

Respectfully submitted,

December 15, 2014



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Table 8
 MISO Production Cost Changes From MVPs 3 and 4

		MISO Production Cost (\$ Millions)				MISO Production Cost Change			
		Study Case 2:		Base Case:		Cost Change		Percent	
		With MVP 3 & 4	With MVP 3 Only	Without MVPs 3 & 4	Without MVPs 3 & 4	Due to MVPs 3 and 4	to MVP 3 only	Difference	Difference
		[A]	[B]	[C]	[C]	[D] = [A] - [C]	[E] = [B] - [C]	[F] = [B] - [C]	[G] = [F]/[C]
Business as Usual:	Low Demand	2021	\$13,217	\$13,289	\$13,332	-\$114.9	-\$42.9	-\$42.9	-0.3%
		2026	\$15,474	\$15,576	\$15,611	-\$136.9	-\$35.2	-\$35.2	-0.2%
Business as Usual:	High Demand	2021	\$15,821	\$15,903	\$15,953	-\$132.2	-\$49.5	-\$49.5	-0.3%
		2026	\$20,308	\$20,451	\$20,494	-\$185.6	-\$43.5	-\$43.5	-0.2%

		MISO Production Cost (\$ Millions)				MISO Production Cost Change			
		Study Case 5:		No MVP 5 Base Case:		Cost Change		Percent	
		With MVP 3 & 4	With MVP 3 Only	Without MVPs 3, 4 & 5	Without MVPs 3, 4 & 5	Due to MVPs 3 and 4	to MVP 3 only	Difference	Difference
		[A]	[B]	[C]	[C]	[D] = [A] - [C]	[E] = [D]/[C]	[F] = [B] - [C]	[G] = [F]/[C]
Business as Usual:	Low Demand	2021	\$13,461	\$13,491	\$13,556	-\$95.3	-0.7%	-\$65.4	-0.5%
		2026	\$15,704	\$15,782	\$15,843	-\$138.7	-0.9%	-\$60.4	-0.4%
Business as Usual:	High Demand	2021	\$16,081	\$16,121	\$16,204	-\$122.3	-0.8%	-\$82.4	-0.5%
		2026	\$20,587	\$20,694	\$20,769	-\$181.8	-0.9%	-\$75.4	-0.4%

Notes:

[1] All cases include all other projects in the MVP portfolio -- that is MVPs 1, 2 and 6-17.

Table 9
MISO Production Cost per MWh Load Changes From MVPs 3 and 4

		With MVP 5						
		Study Case 2:			MISO Production Cost per MWh Change			
		MISO Production Cost per MWh Load (\$/MWh)			Cost Change			
		Study Case 1:		Base Case:		Due to MVPs		
		With MVP 3 & 4		Without MVPs 3 & 4		3 and 4		
		[A]	[B]	[C]	[D] = [A] - [C]	[E] = [D]/[C]	[F] = [B] - [C]	
Year							[G] = [F]/[C]	
Business as Usual:	Low Demand	2021	\$22.82	\$22.95	\$23.02	-0.9%	-\$0.07	-0.3%
		2026	\$25.65	\$25.82	\$25.88	-0.9%	-\$0.06	-0.2%
Business as Usual:	High Demand	2021	\$25.67	\$25.80	\$25.88	-0.8%	-\$0.08	-0.3%
		2026	\$30.66	\$30.87	\$30.94	-0.9%	-\$0.07	-0.2%
		Without MVP 5						
		Study Case 5:			MISO Production Cost per MWh Change			
		MISO Production Cost per MWh Load (\$/MWh)			Cost Change			
		Study Case 4:		No MVP 5 Base Case:		Due to MVPs		
		With MVP 3 & 4		Without MVPs 3, 4 & 5		3 and 4		
		[A]	[B]	[C]	[D] = [A] - [C]	[E] = [D]/[C]	[F] = [B] - [C]	
Year							[G] = [F]/[C]	
Business as Usual:	Low Demand	2021	\$23.24	\$23.29	\$23.41	-0.7%	-\$0.11	-0.5%
		2026	\$26.03	\$26.16	\$26.26	-0.9%	-\$0.10	-0.4%
Business as Usual:	High Demand	2021	\$26.09	\$26.15	\$26.29	-0.8%	-\$0.13	-0.5%
		2026	\$31.08	\$31.24	\$31.36	-0.9%	-\$0.11	-0.4%

Notes:

[1] All cases include all other projects in the MVP portfolio -- that is MVPs 1, 2 and 6-17.

Table 2
LMP Changes From MVPs 3 and 4
Minnesota Avg LMP

		With MVP 5						
		Load Weighted Average LMP (\$ per MWh)			Average LMP Change			
		Study Case 2:			LMP Change			
		Study Case 1:	With MVP 3 Only	Base Case:	Due to MVPs	Percent	LMP Change Due	Percent
Year	With MVPs 3 & 4	(No MVP 4)	Without MVPs 3 & 4	3 and 4	Difference	to MVP 3 only	Difference	
		[A]	[B]	[C]	[D] = [A] - [C]	[E] = [D]/[C]	[F] = [B] - [C]	[G] = [F]/[C]
Business as Usual:	2021	\$27.96	\$28.38	\$28.44	-\$0.48	-1.7%	-\$0.06	-0.2%
Low Demand	2026	\$31.17	\$31.84	\$31.85	-\$0.68	-2.1%	-\$0.01	0.0%
Business as Usual:	2021	\$34.50	\$34.96	\$35.02	-\$0.52	-1.5%	-\$0.06	-0.2%
High Demand	2026	\$45.09	\$45.62	\$45.64	-\$0.55	-1.2%	-\$0.02	-0.1%

		Without MVP 5						
		Load Weighted Average LMP (\$ per MWh)			Average LMP Change			
		Study Case 4:	Study Case 5:	No MVP 5 Base Case:	LMP Change			
		With MVPs 3 & 4	With MVP 3 Only	Without	Due to MVPs	Percent	LMP Change Due	Percent
Year	(No MVP 5)	(No MVP 4 & 5)	MVPs 3, 4 & 5	3 and 4	Difference	to MVP 3 only	Difference	
		[A]	[B]	[C]	[D] = [A] - [C]	[E] = [D]/[C]	[F] = [B] - [C]	[G] = [F]/[C]
Business as Usual:	2021	\$28.85	\$29.18	\$29.21	-\$0.36	-1.2%	-\$0.02	-0.1%
Low Demand	2026	\$32.10	\$32.63	\$32.58	-\$0.48	-1.5%	\$0.06	0.2%
Business as Usual:	2021	\$35.26	\$35.70	\$35.74	-\$0.48	-1.3%	-\$0.04	-0.1%
High Demand	2026	\$46.26	\$46.69	\$46.57	-\$0.31	-0.7%	\$0.11	0.2%

Notes:

[1] All cases include all other projects in the MVP portfolio -- that is MVPs 1, 2 and 6-17.

[2] Minnesota Avg LMP is the load weighted average LMP for Minnesota, calculated as described in Appendix A.

Table 3A
LMP Changes From MVPs 3 and 4
Business as Usual: Low Demand

Area	Percent of Sales in Minnesota	Year	Load Weighted Average LMP (\$ per MWh)			Average LMP Change			
			Study Case 2:			LMP Change Due to MVPs 3 and 4	Percent Difference	LMP Change Due to MVP 3 only	Percent Difference
			Study Case 1: With MVPs 3 & 4	With MVP 3 Only (No MVP 4)	Base Case: Without MVPs 3 & 4				
			[A]	[B]	[C]	[D] = [A] - [C]	[E] = [D]/[C]	[F] = [B] - [C]	[G] = [F]/[C]
Alliant West - Interstate Power & Light	5.5%	2021	\$29.08	\$29.65	\$29.43	-\$0.35	-1.2%	\$0.22	0.8%
		2026	\$33.07	\$33.49	\$33.28	-\$0.21	-0.6%	\$0.22	0.7%
Dairyland Power Cooperative	11.5%	2021	\$30.97	\$32.72	\$31.16	-\$0.19	-0.6%	\$1.56	5.0%
		2026	\$35.54	\$37.57	\$35.31	\$0.23	0.6%	\$2.26	6.4%
Great River Energy	99.6%	2021	\$27.47	\$27.71	\$28.00	-\$0.53	-1.9%	-\$0.29	-1.0%
		2026	\$29.84	\$30.29	\$30.58	-\$0.74	-2.4%	-\$0.29	-1.0%
Minnesota Power and Light Company	100.0%	2021	\$28.23	\$28.50	\$28.63	-\$0.40	-1.4%	-\$0.13	-0.4%
		2026	\$31.43	\$31.88	\$32.02	-\$0.58	-1.8%	-\$0.14	-0.4%
Minnkota Power Coop	45.1%	2021	\$30.22	\$30.41	\$30.65	-\$0.43	-1.4%	-\$0.24	-0.8%
		2026	\$34.47	\$34.75	\$35.18	-\$0.72	-2.0%	-\$0.44	-1.2%
Northern States Power Company	74.8%	2021	\$27.92	\$28.32	\$28.39	-\$0.47	-1.7%	-\$0.06	-0.2%
		2026	\$31.47	\$32.14	\$32.16	-\$0.69	-2.2%	-\$0.02	-0.1%
Otter Tail Power Company	48.4%	2021	\$28.54	\$28.62	\$28.95	-\$0.41	-1.4%	-\$0.33	-1.1%
		2026	\$31.04	\$31.20	\$31.65	-\$0.61	-1.9%	-\$0.45	-1.4%
Southern Minnesota Municipal Power Agency	100.0%	2021	\$26.55	\$28.67	\$27.54	-\$0.99	-3.6%	\$1.13	4.1%
		2026	\$28.64	\$31.57	\$29.58	-\$0.94	-3.2%	\$1.99	6.7%

Notes:

[1] Percent of sales in MN is calculated using data from 2011 Form EIA-861.

[2] All cases include all other projects in the MVP portfolio -- that is MVPs 1, 2 and 6-17.

Table 3B
LMP Changes From MVPs 3 and 4
Business as Usual: Low Demand

Area	Percent of Sales in Minnesota	Year	Without MVP 5			Without MVP 5			
			Load Weighted Average LMP (\$ per MWh)			Average LMP Change			
			Study Case 4: With MVPs 3 & 4 (No MVP 5)	Study Case 5: With MVP 3 Only (No MVP 4 & 5)	No MVP 5 Base Case: Without MVPs 3, 4 & 5	LMP Change Due to MVPs 3 and 4	Percent Difference	LMP Change Due to MVP 3 only	Percent Difference
			[A]	[B]	[C]	[D] = [A] - [C]	[E] = [D]/[C]	[F] = [B] - [C]	[G] = [F]/[C]
Alliant West - Interstate Power & Light	5.5%	2021	\$29.32	\$30.29	\$30.17	-\$0.85	-2.8%	\$0.11	0.4%
		2026	\$33.25	\$34.43	\$34.00	-\$0.75	-2.2%	\$0.43	1.3%
Dairyland Power Cooperative	11.5%	2021	\$31.25	\$33.25	\$31.62	-\$0.37	-1.2%	\$1.63	5.1%
		2026	\$35.83	\$37.93	\$35.58	\$0.25	0.7%	\$2.35	6.6%
Great River Energy	99.6%	2021	\$28.51	\$28.59	\$28.85	-\$0.34	-1.2%	-\$0.26	-0.9%
		2026	\$30.92	\$31.19	\$31.44	-\$0.52	-1.7%	-\$0.25	-0.8%
Minnesota Power and Light Company	100.0%	2021	\$29.01	\$29.18	\$29.31	-\$0.31	-1.1%	-\$0.13	-0.5%
		2026	\$32.24	\$32.61	\$32.72	-\$0.47	-1.4%	-\$0.10	-0.3%
Minnkota Power Coop	45.1%	2021	\$30.97	\$30.97	\$31.27	-\$0.30	-1.0%	-\$0.29	-0.9%
		2026	\$35.40	\$35.57	\$36.07	-\$0.67	-1.9%	-\$0.50	-1.4%
Northern States Power Company	74.8%	2021	\$28.75	\$29.08	\$29.10	-\$0.35	-1.2%	-\$0.02	-0.1%
		2026	\$32.30	\$32.83	\$32.76	-\$0.46	-1.4%	\$0.07	0.2%
Otter Tail Power Company	48.4%	2021	\$29.63	\$29.51	\$29.88	-\$0.25	-0.8%	-\$0.37	-1.2%
		2026	\$32.06	\$32.09	\$32.62	-\$0.56	-1.7%	-\$0.53	-1.6%
Southern Minnesota Municipal Power Agency	100.0%	2021	\$28.21	\$30.46	\$28.98	-\$0.77	-2.7%	\$1.48	5.1%
		2026	\$30.84	\$33.42	\$31.31	-\$0.47	-1.5%	\$2.11	6.8%

Notes:

[1] Percent of sales in MN is calculated using data from 2011 Form EIA-861.

[2] All cases include all other projects in the MVP portfolio -- that is MVPs 1, 2 and 6-17.

Table 4A
LMP Changes From MVPs 3 and 4
Business as Usual: High Demand

Area	Percent of Sales in Minnesota	Year	Load Weighted Average LMP (\$ per MWh)			Average LMP Change			
			Study Case 2:			LMP Change			
			Study Case 1:	With MVP 3 Only	Base Case:	Due to MVPs	Percent	LMP Change Due	Percent
			With MVPs 3 & 4	(No MVP 4)	Without MVPs 3 & 4	3 and 4	Difference	to MVP 3 only	Difference
			[A]	[B]	[C]	[D] = [A] - [C]	[E] = [D]/[C]	[F] = [B] - [C]	[G] = [F]/[C]
Alliant West - Interstate Power & Light	5.5%	2021	\$32.39	\$33.39	\$33.24	-\$0.84	-2.5%	\$0.15	0.5%
		2026	\$39.44	\$40.85	\$40.45	-\$1.01	-2.5%	\$0.40	1.0%
Dairyland Power Cooperative	11.5%	2021	\$36.06	\$38.16	\$36.39	-\$0.34	-0.9%	\$1.77	4.9%
		2026	\$44.69	\$47.07	\$44.18	\$0.51	1.2%	\$2.90	6.6%
Great River Energy	99.6%	2021	\$33.60	\$33.84	\$34.21	-\$0.61	-1.8%	-\$0.37	-1.1%
		2026	\$42.34	\$42.70	\$42.99	-\$0.64	-1.5%	-\$0.29	-0.7%
Minnesota Power and Light Company	100.0%	2021	\$33.77	\$34.13	\$34.28	-\$0.51	-1.5%	-\$0.16	-0.5%
		2026	\$41.95	\$42.39	\$42.37	-\$0.42	-1.0%	\$0.02	0.1%
Minnkota Power Coop	45.1%	2021	\$36.01	\$36.15	\$36.57	-\$0.56	-1.5%	-\$0.41	-1.1%
		2026	\$44.71	\$44.95	\$45.43	-\$0.72	-1.6%	-\$0.48	-1.1%
Northern States Power Company	74.8%	2021	\$35.24	\$35.65	\$35.66	-\$0.42	-1.2%	\$0.00	0.0%
		2026	\$47.94	\$48.33	\$48.46	-\$0.53	-1.1%	-\$0.14	-0.3%
Otter Tail Power Company	48.4%	2021	\$33.97	\$34.04	\$34.53	-\$0.56	-1.6%	-\$0.49	-1.4%
		2026	\$40.87	\$41.03	\$41.48	-\$0.61	-1.5%	-\$0.45	-1.1%
Southern Minnesota Municipal Power Agency	100.0%	2021	\$31.58	\$34.11	\$32.86	-\$1.28	-3.9%	\$1.25	3.8%
		2026	\$38.59	\$41.75	\$39.39	-\$0.80	-2.0%	\$2.36	6.0%

Notes:

[1] Percent of sales in MN is calculated using data from 2011 Form EIA-861.

[2] All cases include all other projects in the MVP portfolio -- that is MVPs 1, 2 and 6-17.

Table 4B
LMP Changes From MVPs 3 and 4
Business as Usual: High Demand

Area	Percent of Sales in Minnesota	Year	Without MVP 5			Without MVP 5			
			Load Weighted Average LMP (\$ per MWh)			Average LMP Change			
			Study Case 4: With MVPs 3 & 4 (No MVP 5)	Study Case 5: With MVP 3 Only (No MVP 4 & 5)	No MVP 5 Base Case: Without MVPs 3, 4 & 5	LMP Change Due to MVPs 3 and 4	Percent Difference	LMP Change Due to MVP 3 only	Percent Difference
			[A]	[B]	[C]	[D] = [A] - [C]	[E] = [D]/[C]	[F] = [B] - [C]	[G] = [F]/[C]
Alliant West - Interstate Power & Light	5.5%	2021	\$32.11	\$33.46	\$33.57	-\$1.46	-4.4%	-\$0.12	-0.3%
		2026	\$39.31	\$41.36	\$41.16	-\$1.84	-4.5%	\$0.20	0.5%
Dairyland Power Cooperative	11.5%	2021	\$36.24	\$38.56	\$36.93	-\$0.69	-1.9%	\$1.64	4.4%
		2026	\$45.45	\$47.56	\$45.15	\$0.30	0.7%	\$2.41	5.3%
Great River Energy	99.6%	2021	\$34.54	\$34.71	\$35.02	-\$0.47	-1.4%	-\$0.31	-0.9%
		2026	\$43.64	\$43.76	\$44.00	-\$0.37	-0.8%	-\$0.24	-0.5%
Minnesota Power and Light Company	100.0%	2021	\$34.56	\$34.83	\$34.95	-\$0.38	-1.1%	-\$0.11	-0.3%
		2026	\$43.23	\$43.51	\$43.50	-\$0.27	-0.6%	\$0.01	0.0%
Minnkota Power Coop	45.1%	2021	\$36.78	\$36.84	\$37.23	-\$0.45	-1.2%	-\$0.39	-1.0%
		2026	\$46.09	\$46.21	\$46.66	-\$0.57	-1.2%	-\$0.45	-1.0%
Northern States Power Company	74.8%	2021	\$35.90	\$36.32	\$36.33	-\$0.44	-1.2%	-\$0.02	0.0%
		2026	\$48.97	\$49.35	\$49.22	-\$0.25	-0.5%	\$0.13	0.3%
Otter Tail Power Company	48.4%	2021	\$35.05	\$35.04	\$35.45	-\$0.40	-1.1%	-\$0.41	-1.2%
		2026	\$42.38	\$42.40	\$42.87	-\$0.49	-1.2%	-\$0.47	-1.1%
Southern Minnesota Municipal Power Agency	100.0%	2021	\$33.03	\$35.53	\$34.14	-\$1.12	-3.3%	\$1.39	4.1%
		2026	\$40.82	\$43.31	\$41.00	-\$0.18	-0.5%	\$2.31	5.6%

Notes:

[1] Percent of sales in MN is calculated using data from 2011 Form EIA-861.

[2] All cases include all other projects in the MVP portfolio -- that is MVPs 1, 2 and 6-17.