

Appendix C

Applicant's Exemption Request



414 Nicollet Mall
Minneapolis, MN 55401

October 17, 2023

—Via Electronic Filing—

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: IN THE MATTER OF THE APPLICATION FOR A CERTIFICATE OF NEED FOR THE
MANKATO TO MISSISSIPPI RIVER 345 kV TRANSMISSION PROJECT
DOCKET NO. E002/CN-22-532

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, respectfully submits this request for exemptions from certain content requirements for the upcoming Certificate of Need application for the Mankato – Mississippi River Transmission Project pursuant to Minn. Rule 7849.0200, subp. 6. Please contact me at monsherra.s.blank@xcelenergy.com or 214-422-3672 if you have any questions regarding this filing.

Sincerely,

/s/ Monsherra S. Blank

MONSHERRA S. BLANK
DIRECTOR, REGULATORY AND STRATEGIC ANALYSIS
NORTHERN STATES POWER COMPANY

cc: Service List

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

| | |
|--------------------|--------------|
| Katie J. Sieben | Chair |
| Valerie Means | Commissioner |
| Matthew Schuerger | Commissioner |
| Joseph K. Sullivan | Commissioner |
| John A. Tuma | Commissioner |

IN THE MATTER OF THE APPLICATION
FOR A CERTIFICATE OF NEED FOR THE
MANKATO – MISSISSIPPI RIVER
TRANSMISSION PROJECT

Docket No. E002/CN-22-532

**REQUEST FOR EXEMPTION FROM
CERTAIN CERTIFICATE OF NEED
APPLICATION CONTENT
REQUIREMENTS**

I. INTRODUCTION

Northern States Power Company, doing business as Xcel Energy (Xcel Energy) respectfully submits this request for exemptions from certain content requirements for the Certificate of Need application for the Mankato – Mississippi River Transmission Project (the Project) pursuant to Minn. Rule 7849.0200, subp. 6. The Project consists of a new 345 kilovolt (kV) transmission line between the Wilmarth Substation in Mankato, Minnesota and the Mississippi River and a new 161 kV transmission line between the North Rochester Substation near Pine Island, Minnesota and an existing transmission line northeast of Rochester, Minnesota. The Project is comprised of four segments:

- Segment 1 Wilmarth to West Faribault—a new 345 kV transmission line between the existing Wilmarth Substation and a point near the West Faribault Substation.
- Segment 2 West Faribault to North Rochester—a new 345 kV transmission line between a point near the existing West Faribault Substation and the existing North Rochester Substation.
- Segment 3 North Rochester to Mississippi River—a new 345 kV transmission line between the existing North Rochester Substation and the Mississippi River.

A portion of Segment 3 involves converting an existing 161/345 kV transmission line to 345/345 kV operation.¹

- Segment 4 North Rochester to Chester—relocation of a portion of a 161 kV transmission line which is needed because a portion of the new 345 kV line in Segment 3 would displace the 161 kV line between North Rochester and Chester that is currently double-circuited with an existing 345 kV line.

It is anticipated that portions of the Project will be jointly owned by Xcel Energy, Dairyland Power Cooperative (Dairyland), Southern Minnesota Municipal Power Agency, and the City of Rochester, Minnesota (collectively, Joint Utilities). Xcel Energy is leading the permitting efforts for the Project and intends to file a combined Certificate of Need and Route Permit Application for the Project in early 2024.

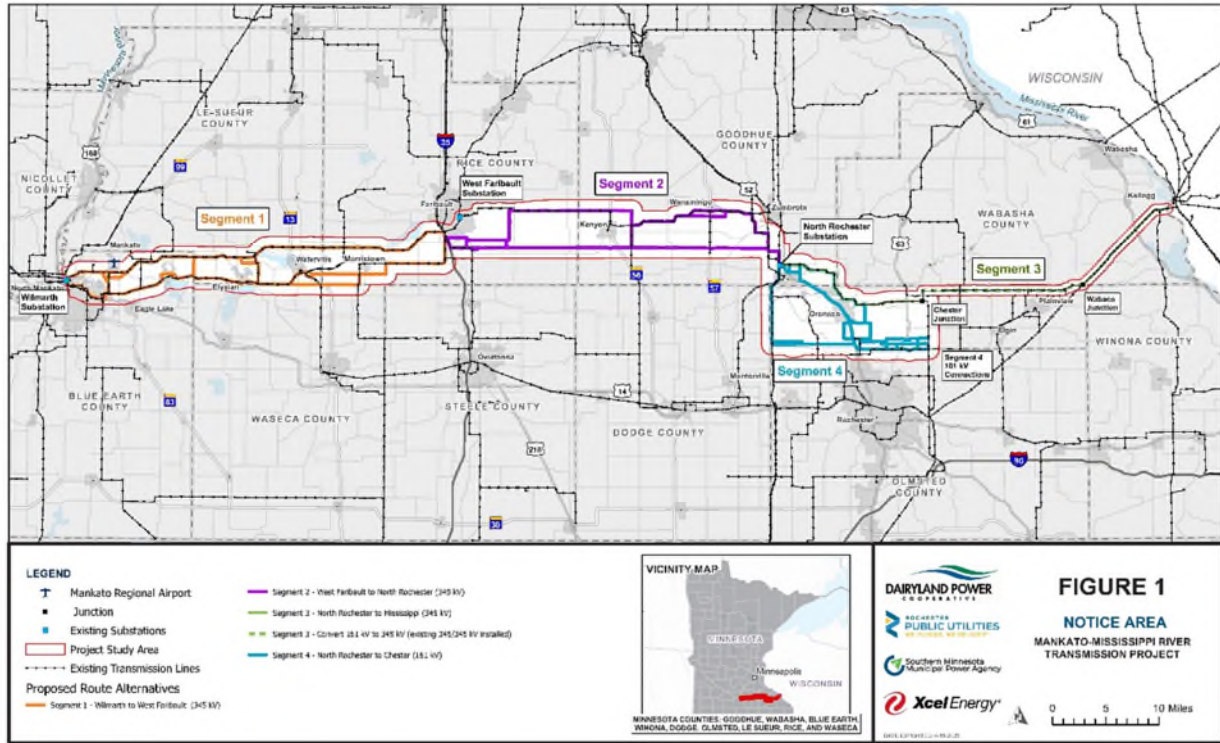
Xcel Energy believes that certain Certificate of Need application content requirements of Minn. Rules Chapter 7849 should be modified to better address the proposed Project and the need for this Project. The Commission has approved similar exemptions for other transmission line projects in the recent past. Xcel Energy therefore respectfully request that the Commission grant exemptions from certain requirements as provided under Minn. Rule 7849.0200, subp. 6. In lieu of some content requirements, Xcel Energy proposes to submit alternative information that will better inform the Commission’s decision regarding the need for the Project.

II. BACKGROUND

The Project is a Large Energy Facility as defined by Minn. Stat. § 216B.2421, subd. 2(2) because the Project includes a 345 kV transmission line that will be longer than 1,500 feet. **Figure 1** below shows the endpoints for the Project as well as other existing transmission facilities of note in the area.

¹ A portion of Segment 3 between Wabaco Junction to the Mississippi River involves converting an existing 345/161 kV transmission line to a 345/345 kV transmission line. This existing 161 kV transmission line is owned by Dairyland Power Cooperative. Dairyland Power Cooperative will be filing a separate Route Permit application (Docket No. ET3/TL-23-388) to relocate and rebuild this existing 161 kV transmission line and to construct a new 161 kV substation near the Mississippi River.

Figure 1: Mankato – Mississippi River Transmission Project



The Project was studied, reviewed, and approved as part of the Long Range Transmission Planning (LRTP) Tranche 1 Portfolio by the Midcontinent Independent System Operator, Inc.’s (MISO)² Board of Directors in July 2022 as part of its 2021 Transmission Expansion Plan (MTEP21) report.³ The Joint Utilities filed a notice of intent to construct, own, and maintain the Project with the Commission on October 10, 2022.

The LRTP Tranche 1 Portfolio will provide significant benefits to the Midwest subregion of the MISO footprint by facilitating more reliable, safe, and affordable energy delivery. The Project, designated as a portion of LRTP4⁴ in MTEP21, is a key part of the LRTP Tranche 1 Portfolio. The transmission system in southern

² MISO is a member-based non-profit regional transmission organization (RTO) that is responsible for the planning and operation of transmission grid and wholesale energy market across 15 states and the Canadian province of Manitoba. MISO’s members include 48 transmission owners with more than 65,800 miles of transmission lines and \$34.5 billion in transmission assets that are under MISO’s functional control.

³ A copy of MTEP21 report is available online at: <https://cdn.misoenergy.org/MTEP21%20Addendum-LRTP%20Tranche%201%20Report%20with%20Executive%20Summary625790.pdf>.

⁴ This Project is the Minnesota portion of LRTP4. The overall LRTP4 project involves the construction of a 345 kV transmission line from the existing Wilmarth Substation in Mankato Minnesota to the existing Tremval Substation located in west central Wisconsin near the town of Blair.

Minnesota is the nexus between significant renewable resources in Minnesota and the Dakotas and the regional load center of the Twin Cities and load centers to the east in Wisconsin. The amount of renewable energy generation on the electric system is increasing as aging traditional generation resources retire and are replaced with renewable resources. This Project will provide additional transmission capacity that is needed to reliably deliver this renewable energy to customers. This Project will relieve overloads on existing transmission facilities and will also reduce congestion on the transmission system resulting in lower energy costs.

III. LEGAL STANDARD AND SUMMARY EXEMPTION

The content requirements for a Certificate of Need application for a large high-voltage transmission lines (LHVTL) are specified in Minn. Rule 7849.0220, subp. 2, Minn. Rule 7849.0240, and Minn. Rules 7849.0260 to 7849.0340. The Commission has authority to grant exemptions from the requirements of Minnesota Rules Chapter 7849 pursuant to Minn. Rule 7849.0200, subp. 6, which provides:

Subp. 6 Exemptions. Before submitting an application, a person is exempted from any data requirement of parts 7849.0010 to 7849.0400 if the person (1) requests an exemption from specific rules, in writing to the commission, and (2) shows that the data requirement is unnecessary to determine the need for the proposed facilities or may be satisfied by submitting another document. A request for exemption must be filed at least 45 days before submitting an application. The commission shall respond in writing to a request for exemption within 30 days of receipt and include the reasons for the decision. The commission shall file a statement of exemptions granted and reasons for granting them before beginning the hearing.

Based on the standard set forth in this rule, the Commission may grant exemptions when the data requirements: (1) are unnecessary to determine need in a specific case; or (2) can be satisfied by submitting documents other than those required by the rules.⁵

⁵ *In the Matter of the Application for a Certificate of Need for the Big Stone South – Alexandria – Big Oaks Transmission Project*, Docket No. E017,ET02, E002, ET10, E015/CN-22-538, ORDER at 1 (April 19, 2023); *In the Matter of The Application for a Certificate of Need for the Appleton – Canby 115 kV Line*, Docket No. E-017/CN-06-0677, ORDER GRANTING EXEMPTIONS AND APPROVING NOTICE PLAN (Aug. 1, 2006).

Xcel Energy specifically requests that the Commission grant exemptions from the following rules as they are either unnecessary to determine the need for the Project or can be satisfied by submitting alternative data:

| Minnesota Rule | Scope of Exemption |
|----------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Minn. Rule 7849.0260, subps. A(3) and C(6) (Losses) | Request exemption from providing line-specific loss information. Xcel Energy proposes to provide substitute data in the form of overall system losses. |
| Minn. Rule 7849.0270, subps. (1) through (6) (Forecasting) | Request exemption from providing specific forecasting and capacity information. Xcel Energy proposes to provide substitute forecast information used in analyzing the need for the Project. |
| Minn. Rule 7849.0270, subp. 2(E) (Annual Revenue Requirements) | Request exemption from providing annual revenue requirements for the Project. Xcel Energy proposes to provide general information regarding how the costs for LRTP projects are shared within the MISO footprint. |
| Minn. Rule 7849.0280, subps. (B) through (I) (System Capacity) | Request full exemption from providing a discussion of the ability of the existing system to meet the forecasted demand for electrical energy identified in response to Minn. Rule 7849.0270. |
| Minn. Rule 7849.0290 (Conservation) | Request exemption from discussing conservation programs and their effect on the forecast information required by Minn. Rule 7849.0270. Xcel Energy proposes to provide substitute information related its conservation programs in Minnesota. Xcel Energy will also provide information regarding how conservation and energy efficiency was considered by MISO in its evaluation of the Project. |

| | |
|-------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Minn. Rule 7849.0300 (Consequences of Delay); Minn. Rule 7849.0340 (No Facility Alternative) | Request to be exempt from providing analysis using three confidence levels. Xcel Energy proposes to provide substitute data regarding potential impacts caused by delay or by not building the Project. |
|-------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

Attachment A to this filing summarizes all of the Certificate of Need content requirements and identifies the requirements for which an exemption is being requested and whether Xcel Energy intends to provide substitute data. Each of these exemption requests is discussed in more detail below. This request is being made at least 45 days prior to submitting an application for a Certificate of Need as required by Minn. Rule 7849.0200, subp. 6.

IV. EXEMPTIONS REQUESTED

A. Minn. Rules 7849.0260, subps. A(3) and C(6) – Losses

Minn. Rule 7849.0260, subp. A(3) requires the applicant to provide the expected losses “under projected maximum loading and under projected average loading in the length of the transmission line and at the terminals or substations.” Subpart C(6) of the rule requires similar information (efficiency of proposed system under maximum and average loading along the length of the line). The electrical grid operates as a single, integrated system, which prevents electricity from being “directed” along a particular line or set of lines. Consequently, losses take place across the entire transmission system and are not isolated to a few transmission lines within the integrated regional electric grid. It is necessary, therefore, to calculate losses across the system affected by the addition of new transmission lines, rather than the losses attributable to the transmission addition itself.

Xcel Energy requests an exemption from Minn. Rules 7849.0260, subps. A(3) and C(6) and proposes to provide system losses in lieu of line-specific losses required by the rules. This proposal is consistent with the approach previously approved by the Commission in several other Certificate of Need transmission line dockets.⁶

⁶ *In the Matter of the Application for a Certificate of Need for the Big Stone South – Alexandria – Big Oaks Transmission Project*, Docket No. E017,ET02, E002, ET10, E015/CN-22-538, ORDER (April 19, 2023); *In the Matter of the Application of Xcel Energy for a Certificate of Need for Two Gen-Tie Lines From Sherburne County to Lyon County, Minnesota*, Docket No. E002/CN-22-131, ORDER (June 28, 2022); *In the Matter of the Application of Xcel Energy and ITC Midwest, LLC for the Huntley - Wilmarth 345 KV Transmission Line Project*, Docket No. E002,ET-6675/CN-17-184, ORDER (Sept. 1, 2017); *In the Matter of the Application of Northern States Power Company d/b/a Xcel Energy for a Certificate of Need for the Upgrade of the Southwest Twin Cities Bluff Creek – Westgate Area 69 kV Transmission Line to 115 kV Capacity*, Docket No. E002/CN-11-332, ORDER GRANTING APPLICANT’S EXEMPTION REQUEST (Nov. 16, 2011).

B. Minn. Rules 7849.0270, subps. 1 through 6 – Forecasting

Xcel Energy seeks an exemption from the content requirements of Minn. Rule 7849.0270, subps. 1-6, which concern forecasting information. Instead, Xcel Energy proposes to provide substitute forecast information that was used by MISO and Xcel Energy in studying, planning, and analyzing the Project. This data will include the load forecasts MISO used in the MTEP21. This substitute data will better inform the record than the specific forecast data identified in this Rule.

The Commission's rules addressing Certificate of Need content requirements were designed decades ago at a time when the transmission improvements under consideration were typically driven by growing demand for electricity and linked directly to a specific generator proposed to meet that need. Consequently, the rules were designed around the concept that a utility provide detailed forecasts of power demand and electricity consumption to demonstrate the need for a specific generating plant that, in turn, justified the need for the proposed transmission capacity.

The Project is needed for multiple reasons including addressing thermal and voltage issues and to provide additional transmission capacity to integrate renewable generation in the region. Rather than providing the forecasting information required by Minn. Rule 7849.0270, Xcel Energy will provide information regarding the forecasts used by MISO and Xcel Energy to assess the need for the Project which will better inform the record in this proceeding.

C. Minn. Rules 7849.0270, subp. 2(E) – Annual Revenue Requirements

Minn. Rule 7849.0270, subp. 2(E) requires an estimate of the “annual revenue requirement per kilowatt-hour for the system in current dollars.” Xcel Energy requests an exemption from this rule and proposes instead to provide general information regarding how the costs for LRTP projects are shared within the MISO footprint. This substitute information will better inform the record regarding the need and cost of the entire LRTP Tranche 1 Portfolio.

D. Minn. Rules 7849.0280, subps. (B) through (I) – System Capacity

Minn. Rule 7849.0280, subps. (B) through (I) pertain to system capacity and generation data. The general purpose of this section is to provide a discussion of the ability of the existing system to meet the forecasted demand for electrical energy in response to Minn. Rule 7849.0270. However, Minn. Rule 7849.0270, subps. (B) through (I) pertain to an examination of generation adequacy and do not address transmission planning considerations. Xcel Energy requests that the Commission grant an exemption to Minn. Rule 7849.0280, subps. (B) through (I). The Commission has previously granted

exemption requests from Minn. Rule 7849.0280, subps. (B) through (I) in several other transmission line Certificate of Need dockets where, as here, issues of transmission adequacy, rather than generation adequacy, were at issue.⁷

E. Minn. Rule 7849.0290 – Conservation Programs

Minn. Rule 7849.0290 requires a Certificate of Need application to provide information related to conservation programs the applicant has in place and their effect on the forecast information required by Minn. Rule 7849.0270. Xcel Energy requests an exemption from Minn. Rule 7849.0290 and instead will provide substitute information related either to its conservation programs in Minnesota. Xcel Energy will also provide information regarding how conservation and energy efficiency was considered by MISO in its evaluation of the Project. This information will better inform the record as to the need for the Project.

F. Minn. Rule 7849.0300 – Consequences of Delay and Minn. Rule 7849.0340 – No Facility Alternative

Minn. Rule 7849.0300 requires detailed information regarding the consequences of delay on three specific statistically-based levels of demand and energy consumption. Minn. Rule 7849.0340 requires a discussion of the impact on existing generation and transmission facilities at the three levels of demand specified in Minn. Rule 7849.0300 for the no-build alternative. Such a discussion is an important element of a determination of the need for new transmission infrastructure. While Xcel Energy will evaluate the consequences of delay and a no build alternative, Xcel Energy requests a variance from the portions of these rules that require the examination to incorporate the three specific levels of demand required by Minn. Rule 7849.0300. Similar requests for exemptions from the requirements of Minn. Rules 7849.0300 and 7849.0340 were approved by the Commission in other recent transmission line Certificate of Need dockets.⁸

V. CONCLUSION

Xcel Energy respectfully request that the Commission grant the exemptions requested herein so that the Certificate of Need application provides focused information to evaluate the need for the proposed Project.

⁷ *Id.*

⁸ *Id.*

Dated: October 17, 2023

Respectfully submitted,

**NORTHERN STATES POWER
COMPANY**, a Minnesota corporation

/s/ Shubha M. Harris

Shubha M. Harris

Principal Attorney

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ATTACHMENT A
Certificate of Need Application
Completeness Checklist

Certificate of Need Application Completeness Checklist

| AUTHORITY | REQUIRED INFORMATION | EXEMPTION REQUESTED? |
|-----------------------------------|---------------------------------------------------------------------------------------------------------------------------------|----------------------|
| Minn. R. 7829.2500, subp. 2 | Brief summary of filing on separate page sufficient to apprise potentially interested parties of its nature and general content | No |
| Minn. R. 7849.0200, subp. 2 | Title Page and Table of Contents | No |
| Minn. R. 7849.0200, subp. 4 | Cover Letter | No |
| Minn. R. 7849.0220, subp. 3 | Joint Ownership and Multiparty use | No |
| Minn. R. 7849.0240 | Need summary and additional considerations | No |
| subp. 1 | Summary of the major factors that justify the need for the proposed facility | No |
| subp. 2 | Relationship of the proposed facility to the following socioeconomic considerations: | — |
| A. | Socially beneficial uses of the output of the facility | No |
| B. | Promotional activities that may have given rise to the demand for the facility | No |
| C. | Effects of the facility in inducing future development | No |
| Minn. R. 7849.0260 | Proposed LHVTL and Alternatives | — |
| A. | A description of the type and general location of the proposed line, including: | — |
| (1) | Design voltage | No |
| (2) | Number, sizes and types of conductors | No |

| AUTHORITY | REQUIRED INFORMATION | EXEMPTION REQUESTED? |
|-----------|-----------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| (3) | Expected losses under projected maximum loading and under projected average loading in the length of the line and at terminals or substations | Exemption Requested Xcel Energy requests to be exempt from providing line-specific loss information. Xcel Energy proposes to provide substitute data in the form of overall system losses. |
| (4) | Approximate length of the proposed line | No |
| (5) | Approximate locations of DC terminals or AC substations on a map | No |
| (6) | List of likely affected counties | No |
| B. | Discussion of the available alternatives including: | — |
| (1) | New generation | No |
| (2) | Upgrading existing transmission lines | No |
| (3) | Transmission lines with different voltages or conductor arrays | No |
| (4) | Transmission lines with different terminals or substations | No |
| (5) | Double circuiting of existing transmission lines | No |
| (6) | If facility for DC (AC) transmission, an AC (DC) transmission line | No |
| (7) | If proposed facility is for overhead (underground) transmission, an underground (overhead) transmission line | No |
| (8) | Any reasonable combination of alternatives (1) – (7) | No |
| C. | For the facility and for each alternative in B, a discussion of: | — |

| AUTHORITY | REQUIRED INFORMATION | EXEMPTION REQUESTED? |
|-----------------------------|----------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| (1) | Total cost in current dollars | No |
| (2) | Service life | No |
| (3) | Estimated average annual availability | No |
| (4) | Estimated annual O&M costs in current dollars | No |
| (5) | Estimate of its effect on rates system wide and in Minnesota | No |
| (6) | Efficiency | Exemption Requested Xcel Energy requests to be exempt from providing line-specific loss information. Xcel Energy proposes to provide substitute data in the form of overall system losses. |
| (7) | Major assumptions made in subitems (1) – (6) | No |
| D. | A map (of appropriate scale) showing the applicant’s system or load center to be served by the proposed LHVTL | No |
| E. | Such other information about the proposed facility and each alternative as may be relevant to determination of need. | No |
| Minn. R. 7849.0270 | Content of Forecast | — |
| Minn. R. 7849.0270, subp. 1 | Peak demand and annual consumption data | Exemption Requested Xcel Energy requests to be exempt from providing specific forecasting and capacity information. Xcel Energy proposes to provide substitute forecast information used in analyzing the need for the Project. |

| AUTHORITY | REQUIRED INFORMATION | EXEMPTION REQUESTED? |
|-----------------------------|-----------------------------------------------------------------------------------------------------|----------------------------------------------------------------------|
| Minn. R. 7849.0270, subp. 2 | For each forecast year the following data: | — |
| A. | Minnesota forecast data | Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1 |
| B. | Estimates of the number of ultimate consumers and annual electrical consumption by those consumers: | Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1 |
| (1) | Farm, excluding irrigation and drainage pumping | Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1 |
| (2) | Irrigation and drainage pumping | Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1 |
| (3) | Nonfarm residential | Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1 |
| (4) | Commercial | Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1 |
| (5) | Mining | Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1 |
| (6) | Industrial | Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1 |
| (7) | Street and highway lighting | Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1 |
| (8) | Electrified transportation ⁹ | Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1 |
| (9) | Other | Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1 |
| (10) | Sum of subitems (1) – (9) | Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1 |
| C. | Estimate of the demand for power in system at the time of annual system peak demand | Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1 |
| D. | System peak demand by month | Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1 |

⁹ Electrified transportation is included in the column labeled “other.”

| AUTHORITY | REQUIRED INFORMATION | EXEMPTION REQUESTED? |
|-----------------------------|-------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| E. | Estimated annual revenue requirement per kWh in current dollars | Exemption Requested Xcel Energy requests to be exempt from providing annual revenue requirements for the Project. Xcel Energy proposes to provide general information regarding how the costs for L RTP projects are shared within the MISO footprint. |
| F. | Estimated average weekday load factor by month | Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1 |
| Minn. R. 7849.0270, subp. 3 | Forecast Methodology | — |
| | Detail of forecast methodology including: | Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1 |
| A. | Overall methodological framework used | Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1 |
| B. | Specific analytical techniques used | Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1 |
| C. | Manner in which specific techniques are related in producing the forecast | Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1 |
| D. | Where statistical techniques are used: | Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1 |
| (1) | Purpose of the technique | Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1 |
| (2) | Typical computations | Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1 |
| (3) | Results of statistical tests | Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1 |
| E. | Forecast confidence levels for annual peak demand and annual electrical consumption | Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1 |
| F. | Brief analysis of methodology including: | Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1 |

| AUTHORITY | REQUIRED INFORMATION | EXEMPTION REQUESTED? |
|-----------------------------|------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------|
| (1) | Strengths and weaknesses | Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1 |
| (2) | Suitability to the system | Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1 |
| (3) | Cost considerations | Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1 |
| (4) | Data requirements | Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1 |
| (5) | Past accuracy | Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1 |
| (6) | Other significant factors | Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1 |
| G. | Explanation of discrepancies | Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1 |
| Minn. R. 7849.0270, subp. 4 | Discussion of data base used for forecasts including: | — |
| A. | List of data sets including a brief description of each | Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1 |
| B. | Identification of adjustments made to raw data including nature, reason and magnitude | Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1 |
| Minn. R. 7849.0270, subp. 5 | Assumptions and Special Information | — |
| | Discussion of each essential assumption including need and nature of assumption and sensitivity of forecast results to assumptions | Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1 |
| | Discussion of assumptions regarding: | Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1 |
| A. | Availability of alternative sources of energy | Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1 |
| B. | Expected conversion from other fuels to electricity or vice versa | Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1 |
| C. | Future prices for customers and their effect on demand | Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1 |

| AUTHORITY | REQUIRED INFORMATION | EXEMPTION REQUESTED? |
|-----------------------------|----------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| D. | Data requested in subp. 2 not historically available or generated by applicant for demand forecast | Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1 |
| E. | Effect of energy conservation programs on long term demand | Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1 |
| F. | Other factors considered when preparing forecast | Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1 |
| Minn. R. 7849.0270, subp. 6 | Coordination of Forecasts with Other Systems | — |
| A. | Extent of coordination of load forecasts with those of other systems | Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1 |
| B. | Description of the manner in which those forecasts are coordinated | Exemption Requested <i>See</i> Minn. R. 7849.0270, subp. 1 |
| Minn. R. 7849.0280 | System Capacity | — |
| | Description of ability of existing system to meet demand forecast including: | — |
| A. | Power planning programs | No |
| B. | Seasonal firm purchases and sales | Exemption Requested Xcel Energy requests to be exempt from providing system capacity information as it is not relevant to transmission line projects like this one. |
| C. | Seasonal participation purchases and sales | Exemption Requested <i>See</i> Minn. R. 7849.0280, subp. B |
| D. | For each forecast year load and generating capacity for: | Exemption Requested <i>See</i> Minn. R. 7849.0280, subp. B |
| (1) | Seasonal system demand | Exemption Requested <i>See</i> Minn. R. 7849.0280, subp. B |
| (2) | Annual system demand | Exemption Requested <i>See</i> Minn. R. 7849.0280, subp. B |
| (3) | Total seasonal firm purchases | Exemption Requested <i>See</i> Minn. R. 7849.0280, subp. B |

| AUTHORITY | REQUIRED INFORMATION | EXEMPTION REQUESTED? |
|--------------------|--------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------|
| (4) | Total seasonal firm sales | Exemption Requested <i>See</i> Minn. R. 7849.0280, subp. B |
| (5) | Seasonal adjusted net demand | Exemption Requested <i>See</i> Minn. R. 7849.0280, subp. B |
| (6) | Annual adjusted net demand | Exemption Requested <i>See</i> Minn. R. 7849.0280, subp. B |
| (7) | Net generating capacity | Exemption Requested <i>See</i> Minn. R. 7849.0280, subp. B |
| (8) | Total participation purchases | Exemption Requested <i>See</i> Minn. R. 7849.0280, subp. B |
| (9) | Total participation sales | Exemption Requested <i>See</i> Minn. R. 7849.0280, subp. B |
| (10) | Adjusted net capability | Exemption Requested <i>See</i> Minn. R. 7849.0280, subp. B |
| (11) | Net reserve capacity obligation | Exemption Requested <i>See</i> Minn. R. 7849.0280, subp. B |
| (12) | Total firm capacity obligation | Exemption Requested <i>See</i> Minn. R. 7849.0280, subp. B |
| (13) | Surplus or deficit capacity | Exemption Requested <i>See</i> Minn. R. 7849.0280, subp. B |
| E. | Summer and winter season load generation and capacity in years subsequent to application contingent on proposed facility | Exemption Requested <i>See</i> Minn. R. 7849.0280, subp. B |
| F. | Summer and winter season load generation and capacity including all projected purchases, sales and generation in years subsequent to application | Exemption Requested <i>See</i> Minn. R. 7849.0280, subp. B |
| G. | List of proposed additions and retirements in generating capacity for each forecast year subsequent to application | Exemption Requested <i>See</i> Minn. R. 7849.0280, subp. B |
| H. | Graph of monthly adjusted net demand and capability with difference between capability and maintenance outages plotted | Exemption Requested <i>See</i> Minn. R. 7849.0280, subp. B |
| I. | Appropriateness and method of determining system reserve margins | Exemption Requested <i>See</i> Minn. R. 7849.0280, subp. B |
| Minn. R. 7849.0290 | Conservation Programs | — |

| AUTHORITY | REQUIRED INFORMATION | EXEMPTION REQUESTED? |
|--------------------|--------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| A. | Persons responsible for energy conservation and efficiency programs | <p>Exemption Requested Xcel Energy requests to be exempt from discussing conservation programs and their effect on the forecast information required by Minn. R. 7849.0270. Xcel Energy proposes to provide substitute information related to its conservation programs in Minnesota. Xcel Energy will also provide information regarding how conservation and energy efficiency was considered by MISO in its evaluation of the Project.</p> |
| B. | List of energy conservation and efficiency goals and objectives | Exemption Requested |
| C. | Description of programs considered, implemented and rejected | Exemption Requested |
| D. | Description of major accomplishments in conservation and efficiency | Exemption Requested |
| E. | Description of future plans with respect to conservation and efficiency | Exemption Requested |
| F. | Quantification of the manner by which these programs impact the forecast | Exemption Requested |
| Minn. R. 7849.0300 | Consequence of Delay | <p>Exemption Requested Xcel Energy requests to be exempt from providing analysis using three confidence levels. Xcel Energy proposes to provide substitute data regarding potential</p> |

| AUTHORITY | REQUIRED INFORMATION | EXEMPTION REQUESTED? |
|--------------------|----------------------------------------------------------------------------|--------------------------------------------------|
| | | impacts caused by delay in building the Project. |
| Minn. R. 7849.0310 | Required Environmental Information | No |
| Minn. R. 7849.0330 | Transmission Facilities | — |
| | Data for each alternative that would require LHVTL construction including: | — |
| A. | For overhead transmission lines | — |
| (1) | Schematics showing dimensions of support structures | No |
| (2) | Discussion of electric fields | No |
| (3) | Discussion of ozone and nitrogen oxide emissions | No |
| (4) | Discussion of radio and television interference | No |
| (5) | Discussion of audible noise | No |
| B. | For underground transmission facilities: | N/A |
| (1) | Types and dimensions of cable systems | N/A |
| (2) | Types and qualities of cable system materials | N/A |
| (3) | Heat released in kW per foot of cable | N/A |
| C. | Estimated right-of-way required for the facility | No |
| D. | Description of construction practices | No |

| AUTHORITY | REQUIRED INFORMATION | EXEMPTION REQUESTED? |
|-----------------------|---------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| E. | Description of O&M practices | No |
| F. | Estimated workforce required for construction and O&M | No |
| G. | Description of region between endpoints in likely area for routes emphasizing a three mile radius of endpoints including: | No |
| (1) | Hydrological features | No |
| (2) | Vegetation and wildlife | No |
| (3) | Physiographic regions | No |
| (4) | Land use types | No |
| Minn. R. 7849.0340 | No-Facility Alternative | <p>Exemption Requested Xcel Energy requests to be exempt from providing analysis using three confidence levels. Xcel Energy proposes to provide substitute data regarding potential impacts caused by not building the Project.</p> |