

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE APPLICATION OF
XCEL ENERGY AND OTTER TAIL POWER
COMPANY FOR AN ENERGY FACILITY
PERMIT TO CONSTRUCT THE POWERON
MIDWEST PROJECT CONSISTING OF A 765-
KV TRANSMISSION LINE, A 345-KV
TRANSMISSION LINE, AND ASSOCIATED
FACILITIES

Docket No. EL26-026

**Petition to Intervene
by the
Midcontinent Independent
System Operator, Inc.**

Petition to Intervene

The Midcontinent Independent System Operator, Inc. (“MISO”) respectfully requests that the South Dakota Public Utilities Commission grant it full-party status in the above-captioned proceeding pursuant to SDCL 1-26-17.1, SDCL 49-41B-17 and ARSD 20:10:01:15.02 *et seq.* MISO further requests that the Commission consider the testimony of Joseph Reddoch offered for filing in support of this Petition.

The Proposed Project

On September 24, 2026, PowerOn Midwest, a consortium of Northern States Power Company and Otter Tail Power Company (hereafter collectively the “Applicants”), filed an application under SDCL chap. 49-41B requesting the Public Utility Commission to give hearing to and then issue a permit authorizing the construction of a 765-kilovolt (“kV”) transmission line in South Dakota. The Applicants propose construction of a 90-mile-long 765-kV transmission line and associated facilities (the “Project”). The transmission line will start at the Big Stone South substation in Grant County, pass through Deuel County to the Brookings County Substation and then to the Minnesota border. The Project includes expansion of the Brookings County and Big Stone South substations and the construction of a five-mile 345 kV line that supports the substation expansion.

MISO Background

MISO is a federally approved not-for-profit, member-based Regional Transmission Organization (“RTO”) providing reliability and market services over 75,000 miles of electricity transmission facilities in fifteen states and one Canadian province, including portions of South

Dakota.¹ Pursuant to federal law, MISO is responsible for operational oversight and control and market operations of the transmission systems of its member transmission owners, including the Applicants.² In addition, it is responsible for planning necessary transmission system expansions, additions and upgrades in coordination with state authorities to ensure efficient, reliable, and non-discriminatory transmission service throughout its territory.³ As part of these efforts, MISO engages in transparent, stakeholder-driven long-range planning to identify transmission improvements necessary to ensure the continued reliability of the regional transmission system and efficiency of wholesale energy markets as the generation fleet changes and demand grows over time.⁴

Basis for MISO's Intervention

MISO has a unique and direct interest in this proceeding, arising in part from its legal obligations to ensure the ongoing ability of the regional transmission system to reliably and efficiently serve demand. Because MISO is accountable for ensuring that the bulk-power system can and will meet evolving conditions, it has a direct and independent interest in the Project and will be directly impacted by any Commission decision affecting the Applicants' authority to construct the Project.

The need for the Project was identified through MISO's long-range transmission planning process. MISO assessed the Project's contribution to regional reliability, its economic benefits, and how its integration into the regional transmission portfolio would contribute to maintaining reliable and efficient service for customers across the MISO Midwest Subregion in the future.⁵ MISO found that the Project, as part of a broader portfolio of transmission projects, will improve regional reliability by creating a 765-kV transmission backbone across the MISO Midwest Subregion while minimizing land use.⁶ The Project will help ensure that customers in South Dakota and across the MISO Midwest Subregion retain reliable electricity under stressed grid conditions such as during extreme weather, even as the generation resource mix changes and demand increases.

The Project is part of a much larger effort to upgrade and strengthen the greater transmission system across the MISO Midwest Subregion, referred to as the Long Range Transmission Planning ("LRTP") Tranche 2.1 portfolio. Maps of the Project and the entire LRTP Tranche 2.1 portfolio are attached, marked as Exhibit A. Applications for governmental

¹ Testimony of Joseph Reddoch, filed with this Petition, p. 2. (Hereafter references to Mr. Reddoch's testimony will be noted as "Reddoch Test. p. ____.")

² *Id.* at pp. 2–3; *see also*, Midcontinent Indep. Sys. Operator, Rate Schedule 01 – Transmission Owners Agreement, Appendix B, Section VI (July 29, 2020), https://docs.misoenergy.org/miso12-legalcontent/Rate_Schedule_01_-_Transmission_Owners_Agreement.pdf.

³ *See* 18 C.F.R. § 35.34(k)(7) (2025).

⁴ Reddoch Test. pp. 12–13, 19–21.

⁵ The MISO Midwest Subregion refers to portion of MISO's footprint that begins in Missouri and extends north to the Canadian border. It is bounded on the east by Michigan and on the west by eastern Montana.

⁶ Reddoch Test. pp. 34–35, 38–41.

approvals required in other states are already underway or will be filed soon.⁷ The Project is an integral part of the LRTP Tranche 2.1 portfolio that is necessary to realize the full scope of reliability and economic benefits offered by the portfolio.⁸

MISO's participation as a party in this docket will promote robust record development. Given its role in identifying the need for and its approval of the Project, MISO has and will provide relevant information about the Project's attributes and local and regional impacts, all of which will likely assist the Commission in its assessment of the evidence presented and concomitantly with its decision-making.

MISO's pecuniary interests are affected by the decision of the Commission. MISO is a directly interested person because the fulfillment of its responsibilities under federal law will be directly and immediately affected by the Commission's decision with respect to the Application. MISO's interests affected by the decision are peculiar to it in its capacity as an RTO and its responsibilities under federal law, all of which are distinct from an interest common to the public in general.

MISO's intervention will not unduly broaden the issues at the proceeding because the matters on which MISO witnesses will testify are raised by the Application and the testimony submitted in conjunction therewith.

MISO's Position with respect to the Project

MISO supports the Applicant's request that a permit issue for the construction of the Project and for the Project itself.

Wherefore

MISO respectfully requests that the Commission grant its petition to intervene as a full party, enter an order admitting MISO as a party to the subject docket, and accept the supporting testimony.

Dated this 16th day of October, 2026.

(signature block on following page)

⁷ See, e.g., *In re Appl. for Cert. of Need for the PowerOn Midwest 765 kV and 345 kV High Voltage Transmission Line Project*, Docket No. 02,ET-2,ET-6675/CN-25-11, ORDER ACCEPTING APPL., VARYING RULES, REQUIRING FILINGS, & NOTICE & ORDER FOR HEARING (Minn. Pub. Utils. Comm'n Apr. 21, 2026).

⁸ Reddoch Test. pp.56-57.

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