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February 26, 2021

VIA ELECTRONIC FILING

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

Re: *In the Matter of the Application of Minnesota Power for a Certificate of
Need for the Duluth Loop Reliability Project*
MPUC Docket No. E015/CN-21-140

Dear Mr. Seuffert:

Minnesota Power respectfully submits this Request for Exemptions from Certain Certificate of Need Application Content Requirements to the Minnesota Public Utilities Commission pursuant to Minnesota Rule 7849.0200, Subp. 6.

If you have any questions regarding this filing, please contact me at (218) 723-3963 or dmoeller@allete.com.

Sincerely,

David R. Moeller
*Senior Attorney and
Director of Regulatory Compliance*

cc: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

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

IN THE MATTER OF THE APPLICATION OF
MINNESOTA POWER FOR A CERTIFICATE OF
NEED FOR THE DULUTH LOOP RELIABILITY
PROJECT

MPUC Docket No. E015/CN-21-140

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

I. INTRODUCTION

Minnesota Power (or the “Company”) respectfully submits this request for exemptions from certain content requirements for a Certificate of Need application for the Duluth Loop Reliability Project (“Project” or “Duluth Loop Project”) pursuant to Minnesota Rule 7849.0200, Subp. 6. Minnesota Power intends to file a combined Application for a Certificate of Need and Route Permit for the Duluth Loop Project pursuant to Minnesota Statutes §§ 216B.243 and 216E.03 in the summer of 2021.

The Duluth Loop Project includes the construction of: (1) a new, more than 10-mile long, 115 kV transmission line connecting the existing Hilltop Substation, located in southwest Duluth, and the Ridgeview Substation, located in the northeast portion of Duluth; (2) an approximately one-mile long extension of the existing Hilltop 230 kV Tap to the Arrowhead Substation; (3) expansion and transmission line reconfigurations at the existing Hilltop and Ridgeview substations; and (4) associated upgrades at the existing Haines Road and Arrowhead substations. The Project is scheduled to be in service in 2025. The Duluth Loop Project is needed to replace the system support once provided by coal-fired baseload generators located along Minnesota’s North Shore by addressing severe voltage stability concerns, relieving transmission line overloads, and enhancing the reliability of Duluth-area transmission sources.

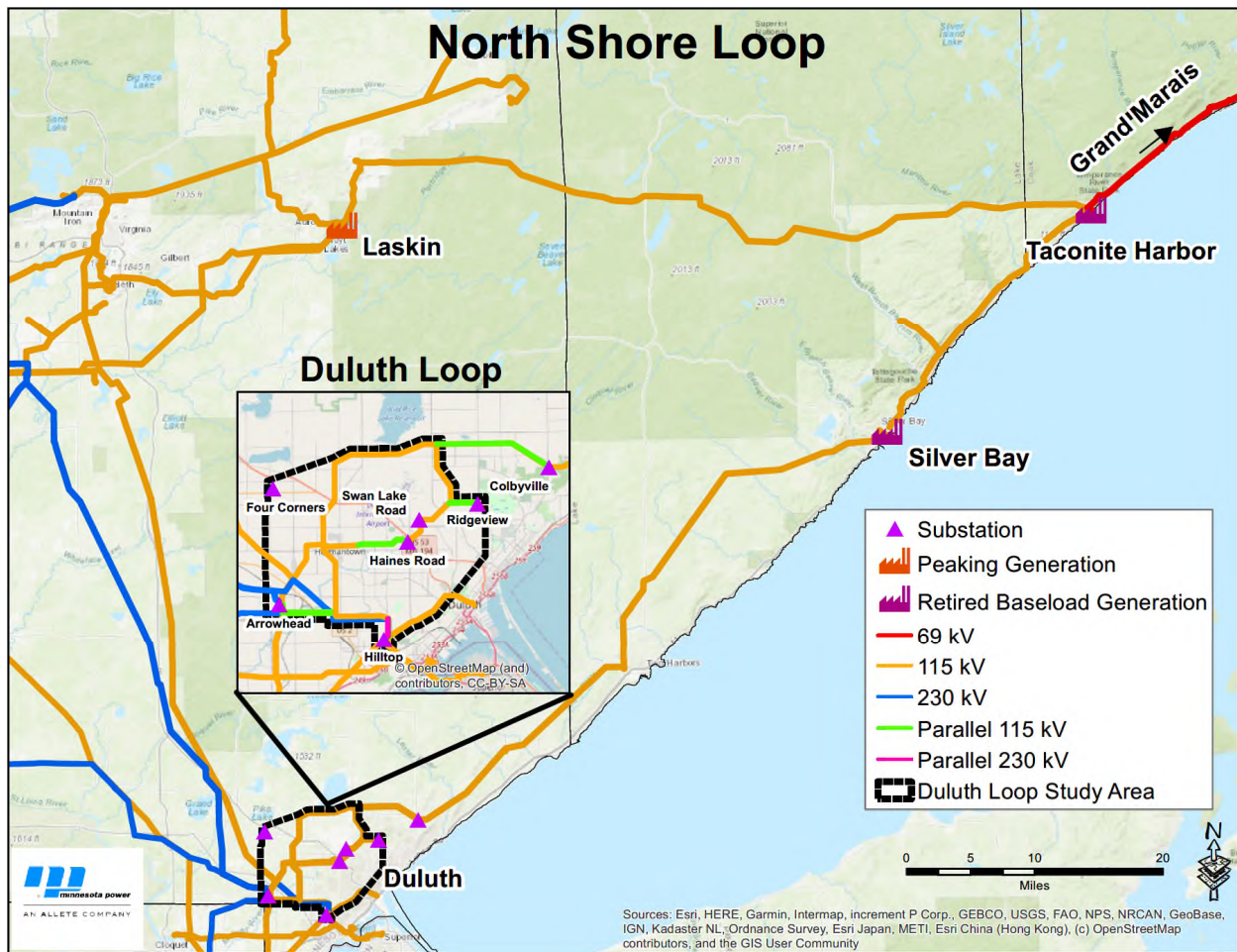
Minnesota Power believes that certain Certificate of Need application content requirements in Minnesota Rules Chapter 7849 should be modified to better address the nature of this Project. These rules were broadly drafted to encompass the content requirements for both high voltage transmission lines (“HVTL”), like the Duluth Loop Project, and large generation facilities. This petition seeks exemptions to those requirements that are not applicable to a transmission line project. The Minnesota Public Utilities Commission (“Commission”) has previously allowed similar adjustments for other

transmission line projects.¹ Therefore, Minnesota Power respectfully requests that the Commission grant exemptions from certain requirements as provided under Minnesota Rule 7849.0200, Subp. 6. In lieu of some content requirements, Minnesota Power proposes to submit alternative information that it believes will better inform the Commission’s decision regarding the need for the Project.

II. BACKGROUND

An overview of the Duluth Loop Project, as well as other generation and transmission facilities in the Project area, is provided in Figure 1 below.

FIGURE 1: Duluth Loop Reliability Project



¹ IN THE MATTER OF THE REQUEST OF MINNESOTA POWER FOR A CERTIFICATE OF NEED FOR THE GREAT NORTHERN TRANSMISSION LINE, Docket No. E015/CN-12-1163, *Order Approving Notice Plan, Granting Variance Request, and Approving Exemption Request* (Feb. 28, 2013); IN THE MATTER OF THE APPLICATION OF GREAT RIVER ENERGY AND MINNESOTA POWER FOR A CERTIFICATE OF NEED FOR A 115 kV HIGH VOLTAGE TRANSMISSION LINE IN ST. LOUIS AND CARLTON COUNTIES, Docket No. E002/CN-10-973, *Order Approving Exemptions and Proposed Provision of Alternative Data* (Nov. 2, 2010).

The transmission system in the Duluth area has historically been supported by several coal-fired baseload generators located along Minnesota's North Shore. For decades, these local generators have contributed to the reliability of the transmission system by delivering power to the local area and providing system support. As Minnesota Power and its customers have transitioned away from reliance on coal to increasingly lower-carbon sources of energy, the idling of the generators on the North Shore has led to an increased reliance on the transmission system to deliver replacement power and system support to the Duluth area and along the North Shore. In order to maintain a continuous supply of safe and reliable electricity while replacing the support once provided by these local coal-fired generators, the Duluth area transmission system must be upgraded. To accomplish this, transmission lines in an area known as the Duluth Loop are being connected to enhance system stability and reliability.

The Duluth Loop is a network of 115 kV transmission lines and substations, which form two parallel connections between the main Duluth-area transmission source of power and system support (the Arrowhead 230/115 kV Substation) and the North Shore (beginning at the Colbyville Substation on the far northeastern end of Duluth). Many of the customers in the Duluth area are served from substations connected to the Duluth Loop, including customers in Hermantown, Duluth Heights, Kenwood, Woodland, Lakeside, Hunter's Park, and Congdon and around the Miller Hill Mall, the Duluth International Airport, the universities, and the downtown hospital district, among others.

The Duluth Loop Project will replace the system support once provided by the North Shore coal-fired baseload generators and is needed to: (1) resolve severe voltage stability concerns; (2) relieve transmission line overloads; and (3) enhance the reliability of Duluth-area transmission sources.

A. Resolve Severe Voltage Stability Concerns

For most transmission outages in the Duluth Loop, the loss of a second Duluth Loop transmission line during the outage would leave all or part of the Duluth Loop and the North Shore served by a single 140-mile-long transmission line originating in the Hoyt Lakes area. Without the support previously provided by the local baseload generators on the North Shore, the transmission system is no longer able to support the large amount of Duluth Loop load over such a long distance. The expected result would be a post-contingent voltage collapse in the Duluth Loop area that would then extend up the North Shore toward Two Harbors. To manage the risk of voltage collapse in real-time operations, the Midcontinent Independent System Operator, Inc. ("MISO") directs Minnesota Power to open the North Shore transmission connection at the Colbyville Substation, separating Duluth from the North Shore during planned outages in the Duluth Loop. This causes the Duluth Loop load to be served by a single transmission path from the Arrowhead Substation and the load along the North Shore to be served by a single transmission path from the Taconite Harbor Substation. This operational solution serves mostly to contain the problem rather than resolve it. This is because the loss of a second Duluth Loop or North Shore transmission line would still result in loss of power for many

residential, commercial, and industrial customers. The proposed Duluth Loop Project will resolve these stability concerns by constructing a new 115 kV transmission line between the Hilltop and Ridgeview substations. This new 115 kV transmission line will replace the redundancy once provided by the local baseload generators and will provide sufficient load-serving capability and flexibility to operate and maintain the system without putting customers at risk when one or more facilities are out of service.

B. Relieve Transmission Line Overloads

During most transmission outages impacting the Taconite Harbor Substation, a majority of load along the North Shore is served through the Duluth Loop. Under this outage scenario, an outage along either transmission connection between the Arrowhead and Colbyville substations could cause significant overloads along the remaining connection. Alternately, if the system at Taconite Harbor and on the North Shore is intact and an outage occurs on both transmission connections between the Arrowhead and Colbyville substations, significant overloads could occur on transmission lines between the Taconite Harbor, North Shore, and Big Rock substations. The new 115 kV transmission line between the Hilltop and Ridgeview substations that is proposed as part of the Duluth Loop Project will provide sufficient transmission capacity to both the Duluth Loop and North Shore areas to prevent these transmission line overloads.

C. Enhance the Reliability of Duluth-Area Transmission Sources

Two 230/115 kV transformers at the Arrowhead Substation and one at the Hilltop Substation deliver power to 115 kV transmission lines in the Duluth area from the regional 230 kV transmission network. The Duluth Loop and the North Shore's reliance on these transformers has greatly increased with the idling of coal-fired baseload generators located along the North Shore. The Hilltop Substation is served by a single, 72-mile long, 230 kV transmission line, which also connects to the Arrowhead and Iron Range substations. Extending this 230 kV transmission line approximately one mile and adding a breaker at the Arrowhead Substation will reduce the number of line miles to the Hilltop Substation from 72 miles to 8 miles. This will greatly improve the reliability of the sole 230 kV source to the Hilltop Substation. Further, the additional breaker for this 230 kV line connection at the Arrowhead Substation will eliminate a single point of failure, which disconnects a 230/115 kV transformer at both the Arrowhead and Hilltop substations, likely causing overloads on the remaining Arrowhead 230/115 kV transformer. Improving the reliability of these three Duluth Area 230/115 kV transformers will benefit customers in the Duluth Loop area and along the North Shore as reliance on these transmission sources increases with the local baseload generators offline.

III. LEGAL STANDARD AND SUMMARY OF EXEMPTION REQUESTS

Minnesota Rule 7849.0220, Subp. 2, Rule 7849.0240, and Rules 7849.0260 to 7849.0340 specify the content requirements for Certificate of Need applications for large high-voltage transmission line ("LHVTL") projects. The Commission has authority to grant exemptions from the requirements of Minnesota Rules Chapter 7849 pursuant to Minnesota 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 specified rules, in writing to the commission, and (2) shows that the data requirement is unnecessary to determine the need for the proposed facility 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.² For the Duluth Loop Project, Minnesota Power 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
<i>Minn. Rule 7849.0260, Subp. A(3) and C(6)</i> (Proposed LHVTL and Alternatives Application)	Request to provide substitute data in the form of overall system losses instead of line losses.
<i>Minn. Rule 7849.0270, Subps. 1-6</i> (Peak Demand and Annual Consumption Forecast; System Revenue Requirements)	Request exemption from providing forecasting and capacity information for Minnesota Power's system and to provide substitute local substation load data for the Project area and forecast information from Minnesota Power's most recent Annual Forecast Report ("AFR"). Request exemption from providing system revenue requirements and provide explanation of how MISO spreads wholesale electricity costs and a general estimate of rate impact of Project on Minnesota Power customers.

² *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).

<p><i>Minn. Rules 7849.0280</i> (System Capacity)</p>	<p>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 Minnesota Rule 7849.0270.</p>
<p><i>Minn. Rule 7849.0290</i> (Conservation)</p>	<p>Request exemption from discussing conservation programs and their effect on the forecast information required by Minn. Rule 7849.0270. Minnesota Power proposes to provide substitute information on its conservation efforts from its most recent Conservation Improvement Plan and Integrated Resource Plan filings.</p>
<p><i>Minn. Rule 7849.0300</i> (Consequences of Delay)</p>	<p>Request to be exempt from providing analysis using three confidence levels. Minnesota Power proposes to provide substitute data regarding potential impacts caused by delay in implementing the Project.</p>
<p><i>Minn. Rule 7849.0340</i> (No Facility Alternative)</p>	<p>Request to be exempt from providing analysis using three confidence levels. Minnesota Power proposes to provide substitute data regarding potential impacts caused by no build alternative.</p>

Each of these 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 Minnesota Rule 7849.0200, Subp. 6.

IV. REQUESTED EXEMPTIONS

A. Minnesota Rules 7849.0260 A(3) and C(6) – Proposed LHVTL and Alternatives Application (Losses)

Minnesota Rule 7849.0260 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.” Minnesota Rule 7849.0260 C(6) 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, heat loss takes place across the entire transmission system and is not isolated to a single transmission line within the integrated regional electric grid. Therefore, losses should be calculated across the entire system rather than based on a single transmission line.

Minnesota Power requests an exemption from Rules 7849.0260 A(3) and C(6) and proposes to provide system losses information in lieu of line-specific losses required by the rules. This approach is consistent with several prior exemption requests approved by the Commission in other Certificate of Need transmission line dockets.³

B. Minnesota Rule 7849.0270, Subp. 1-6– Peak Demand and Annual Consumption Forecast and System Revenue Requirements

1. Rule 7849.0270, Subp. 1 – Peak Demand and Annual Consumption Data

Minnesota Rule 7849.0270, Subp. 1 requires information concerning peak demand and annual consumption for the applicant’s entire service area and system. Since the Duluth Loop Project is designed to serve customers in the Duluth and North Shore areas, Minnesota Power proposes to provide substitute data in the form of historical substation load data for the Project area substations rather than the system as a whole. Minnesota Power will also provide forecast information from its two forecast scenarios included in Minnesota Power’s most recent AFR filed on July 20, 2020 in Docket No. E999/PR-20-11.

2. Rule 7849.0270, Subps. 2(A) and 2(B) – Customer Annual Consumption Data

Minnesota Rule 7849.0270, Subps. 2(A) and 2(B) requires an applicant to estimate the number of customers and the amount of energy consumed annually by nine classes of customers (residential, commercial, industrial, farming, etc). Energy consumption data is not relevant to establishing the need for a proposed transmission line. Transmission systems must be sized so that they have sufficient capacity to operate reliably during periods of peak demand. It is the demand for power during peak times, not the amount of power consumed annually, that is key to determining the need for transmission facilities. Since energy consumption data has no direct impact on transmission planning, the Commission should exempt Minnesota Power from providing this data and accept substitute data in the form of local substation load data and AFR forecast information.⁴

³ IN THE MATTER OF THE REQUEST OF MINNESOTA POWER FOR A CERTIFICATE OF NEED FOR THE GREAT NORTHERN TRANSMISSION LINE, Docket No. E015/CN-12-1163, *Order Approving Notice Plan, Granting Variance Request, and Approving Exemption Request* (Feb. 28, 2013); IN THE MATTER OF THE APPLICATION OF XCEL ENERGY AND ITC MIDWEST, LLC FOR THE HUNTLEY-WILMARTH 345KV TRANSMISSION LINE PROJECT, Docket No. E002, ET-6675/CN-17-184, [Order on Exemption Request] (Sept. 1, 2017); IN THE MATTER OF THE APPLICATION OF GREAT RIVER ENERGY AND MINNESOTA POWER FOR A CERTIFICATE OF NEED FOR A 115 kV HIGH VOLTAGE TRANSMISSION LINE IN ST. LOUIS AND CARLTON COUNTIES, Docket No. E002/CN-10-973, *Order Approving Exemptions and Proposed Provision of Alternative Data* (Nov. 2, 2010).

⁴ IN THE MATTER OF THE APPLICATION OF GREAT RIVER ENERGY AND MINNESOTA POWER FOR A CERTIFICATE OF NEED FOR A 115 kV HIGH VOLTAGE TRANSMISSION LINE IN ST. LOUIS AND CARLTON COUNTIES, Docket No. E002/CN-10-973, *Order Approving Exemptions and Proposed Provision of Alternative Data* (Nov. 2, 2010).

3. Rule 7849.0270, Subps. 2(C) and 2(D) – System Demand and Peak Demand

Minnesota Rule 7849.0270, Subp. 2(C) seeks an estimate of the demand for power in the system at the time of annual system peak demand. Minnesota Rule 7849.0270, Subp. 2(D) calls for monthly system peak demand data. Evaluation of the transmission capacity for the Duluth Loop Project is based on maximum peak demand within the Project area. Rather than providing system peak demand data that provides little insight into the localized transmission needs underlying the Duluth Loop Project, Minnesota Power proposes to provide actual historical load data for local substations and AFR forecast information.

4. Rule 7849.0270, Subps. 2(E) – System Revenue Requirements

Minnesota Rule 7849.0270, Subp. 2(E) requires an estimate of the “annual revenue requirement per kilowatt-hour for the system in current dollars.” Minnesota Power proposes to provide the general rate impact of the Duluth Loop Project on Minnesota Power’s customers. The Commission has previously granted similar exemption requests for other transmission projects.⁵

5. Rule 7849.0270, Subps. 2(F) – Weekday Load Factor

Minnesota Rule 7849.0270, Subp. 2(F) requires an applicant’s average system weekday load factor for each month. Minnesota Power requests an exemption from this requirement because load factor is not a relevant consideration when evaluating the need for a transmission facility. Load factor is a measure of how demand varies over time and is relevant to the need determination for new generation. Load factor has no bearing on the need for a new transmission line. Rather, transmission capacity must be designed to meet peak demand and other system power flow circumstances. This is done to ensure there is sufficient transmission capacity to meet lower levels of instantaneous demand. Thus, Minnesota Power respectfully requests an exemption from this requirement which the Commission has granted in the past for other transmission projects.⁶

⁵ IN THE MATTER OF THE APPLICATION OF GREAT RIVER ENERGY AND MINNESOTA POWER FOR A CERTIFICATE OF NEED FOR A 115 kV HIGH VOLTAGE TRANSMISSION LINE IN ST. LOUIS AND CARLTON COUNTIES, Docket No. ET2,E015/CN-10-973, *Order Approving Exemptions and Proposed Provision of Alternative Data* (Nov. 2, 2010).

⁶ IN THE MATTER OF THE REQUEST OF MINNESOTA POWER FOR A CERTIFICATE OF NEED FOR THE GREAT NORTHERN TRANSMISSION LINE, Docket No. E-015/CN-12-1163, *Order Approving Notice Plan, Granting Variance Request, and Approving Exemption Request* (Feb. 28, 2013); IN THE MATTER OF THE APPLICATION OF GREAT RIVER ENERGY AND MINNESOTA POWER FOR A CERTIFICATE OF NEED FOR A 115 kV HIGH VOLTAGE TRANSMISSION LINE IN ST. LOUIS AND CARLTON COUNTIES, Docket No. ET2,E015/CN-10-973, *Order Approving Exemption Request* (Nov. 2, 2010).

6. Rule 7849.0270, Subps. 3-6 – Forecast Methodology, Data Base, Assumptions, and Coordination of Forecasts

Minnesota Rule 7849.0270, Subps. 3-6 require the applicant to detail the forecast methodology employed, identify the database used for the forecast, detail the assumptions made in preparing the forecasts provided under Subpart 2 of the same rule, and a description of load forecast coordination efforts with other systems. As stated above, the need for transmission facilities is not prompted by energy consumption, but rather, by demand during peak times. Thus, instead of providing energy consumption forecasts, Minnesota Power believes that historical load data for Project area substations will better enable the Commission to evaluate the need for this Project. Minnesota Power will also provide its most recent AFR. The AFR discusses forecast methodology, databases, forecast assumptions, and coordination of forecasts with other systems.

In sum, Minnesota Power requests an exemption from the data requirements of Minnesota Rule 7849.0270, Subp. 1-6 and will provide actual historical load data for local substations and relevant AFR forecast information. This substitute information is better tailored to the need for the Duluth Loop Project and will assist the Commission in evaluating whether the Project is needed.

C. Minnesota Rule 7849.0280 – System Capacity

Minnesota Rule 7849.0280 pertains 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 Minnesota Rule 7849.0270. Subparts (B) through (I) pertain to an examination of generation adequacy and do not address transmission planning considerations. Minnesota Power therefore requests that the Commission grant an exemption from Rule 7849.0280. The Commission has previously granted exemption requests from Rule 7849.0280 in several other transmission line Certificate of Need dockets where issues of transmission adequacy, rather than generation adequacy, were at issue.⁷

D. Minnesota Rule 7849.0290 – Conservation

Minnesota Power requests an exemption from Minnesota Rule 7849.0290, which relates to conservation programs the applicant has in place and their effect on the forecast information called for in Minnesota Rule 7849.0270. This rule is intended to ensure that regulated load serving utilities fully consider conservation as well as generation when planning for future needs of their customers.⁸ Minnesota Power's conservation and efficiency information is examined in detail in the resource planning process. All of the

⁷ IN THE MATTER OF THE APPLICATION OF GREAT RIVER ENERGY AND MINNESOTA POWER FOR A CERTIFICATE OF NEED FOR A 115 kV HIGH VOLTAGE TRANSMISSION LINE IN ST. LOUIS AND CARLTON COUNTIES, Docket No. ET2,E015/CN-10-973, *Order Approving Exemptions and Proposed Provision of Alternative Data* (Nov. 2, 2010).

⁸ IN THE MATTER OF THE APPLICATION OF RAPIDS POWER LLC FOR A CERTIFICATE OF NEED FOR ITS GRAND RAPIDS COGENERATION PROJECT, Docket No. IP4/CN-01-1306, *Order Granting Exemptions from Filing Requirements* (Oct. 9, 2001) at p. 6.

information requested by Minnesota Rule 7849.0290 is contained in Minnesota Power's Integrated Resource Plan and Conservation Improvement Plan ("CIP") filings.⁹ Instead of replicating that information in this application, Minnesota Power proposes to present a summary of these filings. This will allow interested parties to pursue their investigation into this issue further through those materials if they wish. The Commission has granted Minnesota Power an exemption from this requirement in a prior docket and it is appropriate to do so here as well.¹⁰

E. Minnesota Rule 7849.0300 – Consequences of Delay and Minnesota Rule 7849.0340 – No Facility Alternative

Minnesota Rule 7849.0300 requires detailed information regarding the consequences of delay on three specific statistically-based levels of demand and energy consumption. Similarly, Minnesota Rule 7849.0340 requires a discussion of the impact on existing generation and transmission facilities at the three levels of demand specified in part 7849.0300 for the no-build alternative. While Minnesota Power will discuss the consequences of delay and a no build alternative in its application, there is no need discuss these items in terms of three levels of demand. Rather, as noted above, for transmission planning purposes, the relevant inquiry is whether the system can meet peak demand. The Commission has approved similar partial exemption requests from the requirements of Minnesota Rules 7849.0300 and 7849.0340 in other transmission line Certificate of Need dockets.¹¹

V. CONCLUSION

Minnesota Power respectfully requests that the Commission grant the requested exemptions to allow Minnesota Power to provide information in its application that is relevant to determining the need for the Duluth Loop Project without imposing unnecessary filing burdens.

⁹ See Docket Nos. E015/RP-21-33 and E015/CIP-20-476.

¹⁰ IN THE MATTER OF THE REQUEST OF MINNESOTA POWER FOR A CERTIFICATE OF NEED FOR THE GREAT NORTHERN TRANSMISSION LINE, Docket No. E015/CN-12-1163, *Order Approving Notice Plan, Granting Variance Request, and Approving Exemption Request* (Feb. 28, 2013).

¹¹ IN THE MATTER OF THE REQUEST OF MINNESOTA POWER FOR A CERTIFICATE OF NEED FOR THE GREAT NORTHERN TRANSMISSION LINE, Docket No. E015/CN-12-1163, *Order Approving Notice Plan, Granting Variance Request, and Approving Exemption Request* (Feb. 28, 2013); IN THE MATTER OF THE APPLICATION OF NORTHERN STATES POWER COMPANY D/B/A XCEL ENERGY AND GREAT RIVER ENERGY FOR A CERTIFICATE OF NEED FOR THE UPGRADE OF THE SOUTHWEST TWIN CITIES (SWTC) CHASKA AREA 69 kV TRANSMISSION LINE TO 115 kV CAPACITY, Docket No. E002/CN-11-826, *Order Granting The Company' Exemption Request* (Nov. 4, 2011).

February 26, 2021

Respectfully submitted,

MINNESOTA POWER

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IN THE MATTER OF THE APPLICATION OF
MINNESOTA POWER FOR A CERTIFICATE OF
NEED FOR THE DULUTH LOOP RELIABILITY
PROJECT

MPUC DOCKET No. E015/CN-21-140

CERTIFICATE OF SERVICE

Theresa A. Senart certifies that on the 26th day of February 2021, on behalf of Minnesota Power, she filed a true and correct copy of **Request for Exemption from Certain Certificate of Need Application Content Requirements** via eDockets (www.edockets.state.mn.us). Said document was also served as designated on the attached service list on file with the Minnesota Public Utilities Commission, designated as “PPSA General List 7850.2100-1A Permit Filings.”

/s/ Theresa A. Senart

Theresa A. Senart

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