

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben  
Hwikwon Ham  
Audrey C. Partridge  
Joseph K. Sullivan  
John A. Tuma

Chair  
Commissioner  
Commissioner  
Commissioner  
Commissioner

In the Matter of the Application for a Certificate  
of Need for the Iron Range - St. Louis County -  
Arrowhead 345 kV Transmission Line Project

SERVICE DATE: November 18, 2025

DOCKET NO. E-015/CN-25-111

The above-entitled matter was considered by the Commission on October 30, 2025, and the following disposition made:

- 1. Approved the proposed notice plan.**
- 2. Delegated authority to the Executive Secretary to review and approve the updated project notice area map.**
- 3. Granted a variance from the newspaper notice requirement in Minn. R. 7829.2500, subp. 5.**
- 4. Granted a variance from the 30-day implementation of the notice plan in Minn. R., 7829.2550, subp. 6. and required the Applicants to issue the notices no more than 90 days and no less than two weeks prior to the filing of the certificate of need application.**
- 5. Granted the requested exemptions from Minnesota R. ch. 7849 as described in the Applicants' August 7, 2025 filing, with the exemption to Minn. R. 7849.0280 as proposed by the Applicants in their September 16, 2025 reply comments requiring them to provide the alternative data regarding subp. (A).**
- 6. Required the applicants to reevaluate the 800 MVA limit on the Arrowhead Substation in this docket. Required Applicants to provide notice via a filing summary not only to the persons required under Minn. R. ch. 7849 but also to the parties in Docket Nos. E-015/AI-11-75 and E-015/PA-04-2020.**

The Commission agrees with and adopts the recommendations of the Department of Commerce, which are attached and hereby incorporated into the Order. This Order shall become effective immediately.



BY ORDER OF THE COMMISSION

A handwritten signature in black ink that reads "Sasha Bergman".

Sasha Bergman  
Executive Secretary

To request this document in another format such as large print or audio, call 651.296.0406 (voice). Persons with a hearing or speech impairment may call using their preferred Telecommunications Relay Service or email [consumer.puc@state.mn.us](mailto:consumer.puc@state.mn.us) for assistance.

August 27, 2025

Mike Bull  
Interim Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, Minnesota 55101-2147

RE: Comments of the Minnesota Department of Commerce  
Docket No. E015/CN-25-111

Dear Mr. Bull:

Attached are the comments of the Minnesota Department of Commerce (Department) in the following matter:

*In the Matter of the Application for a Certificate of Need for the Iron Range  
– St. Louis County – Arrowhead 345 kV Transmission Line Project: Notice  
Plan Petition.*

The Petition was filed by ALLETE, Inc. d/b/a Minnesota Power and American Transmission Company LLC on August 7, 2025.

The Department recommends **approval** and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Dr. SYDNIE LIEB  
Assistant Commissioner of Regulatory Analysis

SR/ar  
Attachment

## Before the Minnesota Public Utilities Commission

### Comments of the Minnesota Department of Commerce

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Docket No. E015/CN-25-111

#### I. INTRODUCTION

ALLETE, Inc. d/b/a Minnesota Power (MP) and American Transmission Company LLC by and through its corporate manager ATC Management Inc. (ATC) (collectively, the Applicants) submitted a notice plan petition for approval by the Minnesota Public Utilities Commission (Commission) pursuant to Minn. R. 7829.2550.<sup>1</sup> The Notice Petition is intended to provide notice to all persons reasonably likely to be affected by the Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project (ISA Project). The Applicants intend to submit a combined application for a Certificate of Need and a Route Permit to construct and maintain the ISA Project pursuant to Minn. Stat. §§ 216B.243 and 216I.05 in the fourth quarter of 2025.

The proposed ISA Project was studied, reviewed, and approved by the Midcontinent Independent System Operator, Inc. (MISO) as part of its Long-Range Transmission Planning (LRTP) Tranche 2.1 portfolio of projects included in the 2024 MISO Transmission Expansion Plan (MTEP24). The Applicants state that the proposed ISA Project is needed to enhance grid reliability in the Upper Midwest

#### II. PROCEDURAL BACKGROUND

August 7, 2025	MP and ATC filed the Notice Petition, seeking approval of a notice plan for the ISA Project.
December 8, 2023	The Public Utilities Commission (Commission) posted a notice of comment period for the petition.

#### III. DEPARTMENT ANALYSIS

##### A. GOVERNING STATUTES AND RULES

The Applicants filed the Notice Petition pursuant to Minnesota Rules 7829.2550 subp. 1 which states, in part “[t]hree months before filing a certificate of need application for a high-voltage transmission line as defined by Minnesota Statutes, section 216B.2421, the applicant shall file a proposed plan for providing notice to all persons reasonably likely to be affected by the proposed line.”<sup>2</sup>

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<sup>1</sup> *In the Matter of the Application for a Certificate of Need for the Iron Range – St. Louis County – Arrowhead 345 kV Transmission Line Project*, MP and ATC, Notice Petition, August 7, 2025, Docket No. E015/CN-25-111, (eDockets) [20258-221885-01](#), (hereinafter “Notice Petition”).

<sup>2</sup> [Minnesota Rules 7829.2550](#)

Minnesota Statutes § 216B.2421 includes in its definition of a Large Energy Facility (LEF) “any high-voltage transmission line with a capacity of 200 kilovolts or more and greater than 1,500 feet in length.” Given that the proposed ISA Project is a 345 kV transmission line substantially longer than 1,500 feet, the proposed ISA Project falls within the definition of “large energy facility” and, therefore, requires a notice plan.

*B. TYPES OF NOTICE*

Minnesota Rules 7829.2550, subp. 3, requires types of notice as follows:

- direct mail notice, based on county tax assessment rolls, to landowners reasonably likely to be affected by the proposed transmission line;
- direct mail notice to all mailing addresses within the area reasonably likely to be affected by the proposed transmission line;
- direct mail notice to tribal governments and to the governments of towns, statutory cities, home rule charter cities, and counties whose jurisdictions are reasonably likely to be affected by the proposed transmission line; and
- newspaper notice to members of the public in areas reasonably likely to be affected by the proposed transmission line.

The area proposed to be included in notices (Notice Area) is shown in Attachment A of the Notice Petition. The Notice Petition further states that the Notice Area:

is generally 1.5 miles wide centered on existing high voltage transmission lines. The Notice Area expands up to 2.25 miles wide in some areas to provide routing flexibility.

The list of individuals and entities to be provided notice is to be compiled by Applicants is as follows:

- Regarding landowner notice—Applicants have obtained tax landowner names and addresses within the Notice Area using geographic information system (GIS) county parcel records.
- Regarding notice to mailing addresses—Applicants have obtained a list of mailing addresses in the Notice Area from St. Louis and Itasca Counties.
- Regarding notice to tribal governments—Applicants will provide direct mail notice to each of the 11 federally recognized Tribal Nations in Minnesota, as well as the Minnesota Indian Affairs Counsel.<sup>3</sup>

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<sup>3</sup> See Attachment B-1 of the Notice Petition for detailed information.

- Regarding notice to local governmental jurisdictions—Applicants propose to provide direct mail notice to lead administration personnel and elected officials in local governments and to those state senators and state representatives whose districts are within the Notice Area.<sup>4</sup>
- Regarding newspaper notice—Applicants propose to place notice advertisements in four newspapers listed in Table 1 of the Notice Petition.

After reviewing the Petition's Table 1, Figure 1 of Attachment A, Attachment B-1 and Attachment B-2, the Department concludes that the Applicants' general process for identification of individuals and local governmental organizations that should receive notice meets the required notice in Minn. R. 7829.2550, subp. 3.

Note that the Applicants propose to submit an updated map that will show the routes the Applicants are likely to propose the Route Permit filing. The Applicants will provide a copy of this updated map to Commission staff for review prior to mailing. The Department concludes that this is a reasonable process for arranging specifics of an updated map.

The Department recommends the Commission approve the Applicants' proposed list of notice recipients. The Department also recommends the Commission delegate to the Executive Secretary authority to review and approve an updated map.

### *C. CONTENT OF NOTICE*

Minnesota Rules 7829.2550, subp. 4 require the notices to provide the following information:

- a map showing the end points of the line and existing transmission facilities in the area;
- a description of general right-of-way requirements for a line of the size and voltage proposed and a statement that the applicant intends to acquire property rights for the right-of-way that the proposed line will require;
- a notice that the line cannot be constructed unless the Minnesota Public Utilities Commission (Commission) certifies that it is needed;
- the Commission's mailing address, telephone number, and website;
- if the applicant is a utility subject to chapter 7848, the address of the website on which the utility applicant will post or has posted its biennial transmission projects report required under that chapter;
- a statement that the Environmental Quality Board<sup>5</sup> will be preparing an environmental report on each high-voltage transmission line for which certification is requested;
- a brief explanation of how to get on the mailing list for the Environmental Quality Board's proceeding; and

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<sup>4</sup> See Attachment B-2 of the Notice Petition for detailed information.

<sup>5</sup> This function has since been transferred to the Commission.

- a statement that requests for certification of high-voltage transmission lines are governed by Minnesota law, including specifically chapter 4410, parts 7849.0010 to 7849.0400, and 7849.1000 to 7849.2100, and Minnesota Statutes, section 216B.243.

The Department reviewed the text of the proposed landowner/resident/governmental official notice provided in Attachment A of the Notice Petition and concludes that the proposal contains the required information.

The Department notes two items. First, the text of the notice discusses environmental review but does not specifically mention that an environmental report is prepared as part of the certificate of need proceeding. However, the Applicants' discussion clearly communicates the essentials of environmental review. Second, the Notice Petition did not include a separate sample newspaper notice. The Department confirmed with the Applicants that the text of the newspaper notice will be the same as the text in Attachment A of the Notice Petition.

The Department recommends the Commission approve the Applicants' proposed notice text.

*D. DUPLICATIVE NOTICE*

Table 1 of the Notice Petition shows that the Applicants propose to publish notice in the Star Tribune, a paper of statewide circulation. This notice will be published shortly before the Certificate of Need application is filed. Thus, the Applicants request that the Commission vary the requirement under Minn. R. 7829.2500, subp. 5 and remove the additional requirement to publish notice of the application in a statewide paper after the Certificate of Need application is filed with the Commission.

Minnesota Rules, part 7829.3200 governs such variance requests and establishes the following criteria:

1. enforcement of the rule would impose an excessive burden upon the applicant or others affected by the rule;
2. granting the variance would not adversely affect the public interest; and
3. granting the variance would not conflict with standards imposed by law.

The Applicants conclude that the requirements for a variance are met as follows:

1. The requirement would be an excessive burden as it requires duplicate notice and associated expense without an offsetting benefit;
2. the public interest would not be adversely affected because the public will receive the pre-application notice; and
3. the Commission has previously granted such a variance and there is no conflict with any standards imposed by law.

The Department agrees with the Applicants' assessment and recommends that the Commission approve the proposed rule variance regarding duplicative notice.

*E. NOTICE TIMING*

Minnesota Rules 7829.2550, subp. 6, requires an applicant to implement the notice plan within 30 days of its approval by the Commission. In this case the Applicants request that the Commission grant a variance and direct the notices occur no more than 90 days and no less than two weeks prior to the filing of the certificate of need application.

The Applicants conclude that the requirements for a variance are met as follows:

1. the notice requirements would burden all parties by separating notice provided to interested stakeholders from the start of the proceeding;
2. granting the variance would not adversely affect the public interest; and
3. granting a variance would not conflict with standards imposed by law.

The Department agrees with the Applicants assessment and recommends that the Commission approve the proposed rule variance regarding notice timing.

**IV. DEPARTMENT RECOMMENDATIONS**

Based on analysis of the information in the record, the Department has prepared recommendations, which are provided below. The recommendations correspond to the subheadings of Section III above.

*B. TYPES OF NOTICE*

- The Department recommends the Commission approve the Applicants' proposed list of notice recipients.
- The Department recommends the Commission delegate to the Executive Secretary authority to review and approve an updated map.

*C. CONTENT OF NOTICE*

- The Department recommends the Commission approve the Applicants' proposed notice text.

*D. DUPLICATIVE NOTICE*

- The Department recommends that the Commission approve the proposed rule variance regarding duplicative notice.

*E. NOTICE TIMING*

- The Department recommends that the Commission approve the proposed rule variance regarding notice timing.

August 27, 2025

Mike Bull  
Interim Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, Minnesota 55101-2147

RE: Comments of the Minnesota Department of Commerce  
Docket No. E015/CN-25-111

Dear Mr. Bull:

Attached are the comments of the Minnesota Department of Commerce (Department) in the following matter:

*In the Matter of the Application for a Certificate of Need for the Iron Range  
– St. Louis County – Arrowhead 345 kV Transmission Line Project: Request  
for Exemptions.*

The Petition was filed by ALLETE, Inc. d/b/a Minnesota Power and American Transmission Company LLC on August 7, 2025.

The Department recommends **approval with modifications** and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Dr. SYDNIE LIEB  
Assistant Commissioner of Regulatory Analysis

SR/ar  
Attachment



## Before the Minnesota Public Utilities Commission

### Comments of the Minnesota Department of Commerce

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Docket No. E015/CN-25-111

#### I. INTRODUCTION

ALLETE, Inc. d/b/a Minnesota Power (MP) and American Transmission Company LLC by and through its corporate manager ATC Management Inc. (ATC) (collectively, the Applicants) submitted a petition requesting certain exemptions to data requirements be approved by the Minnesota Public Utilities Commission (Commission) pursuant to Minn. R. 7849.0200, subp. 6.<sup>1</sup> The Exemption Petition is intended to tailor the data provided by the Applicants in a future certificate of need petition they intend to make.

In a future filing the Applicants will be requesting a certificate of need for the Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project (ISA Project). The Applicants intend to submit a combined application for a Certificate of Need and a Route Permit to construct the ISA Project pursuant to Minn. Stat. §§ 216B.243 and 216I.05 in the fourth quarter of 2025.

The proposed ISA Project was studied, reviewed, and approved by the Midcontinent Independent System Operator, Inc. (MISO) as part of its Long-Range Transmission Planning (LRTP) Tranche 2.1 portfolio of projects included in the 2024 MISO Transmission Expansion Plan (MTEP24). The Applicants state that the proposed ISA Project is needed to enhance grid reliability in the Upper Midwest.

#### II. PROCEDURAL BACKGROUND

August 7, 2025                      MP and ATC filed the Exemption Petition, seeking approval of a data exemptions for a future certificate of need (CN) petition for the ISA Project.

August 19, 2025                      The Commission issued a Notice of Comment Periods.<sup>2</sup>

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<sup>1</sup> *In the Matter of the Application for a Certificate of Need for the Iron Range – St. Louis County – Arrowhead 345 kV Transmission Line Project*, MP and ATC, Exemption Petition, August 7, 2025, Docket No. E015/CN-25-111, (eDockets), [20258-221879-01](#), (hereinafter “Exemption Petition”).

<sup>2</sup> *In the Matter of the Application for a Certificate of Need for the Iron Range – St. Louis County – Arrowhead 345 kV Transmission Line Project*, Commission, Notice of Comment Periods, August 19, 2025, Docket No. E015/CN-25-111, (eDockets), [20258-222214-01](#), (hereinafter “Notice”).

According to the Notice, the following topic is open for comment:

- *Should the Commission grant the exemptions to the certificate of need application content requirements as requested by the Applicants' in their August 7, 2025 filing?*

### **III. DEPARTMENT ANALYSIS**

#### *A. GOVERNING STATUTES AND RULES*

The Applicants filed the Exemption Petition pursuant to Minn. R. 7849.0200, subp. 6, which states, in part:

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.

Based on this standard, the Commission may grant exemptions when the data requirements are shown to be unnecessary to determine need or can be satisfied by submitting alternative information. In the Petition, the Applicants request to be exempted from certain data requirements of Minn. R. 7849.0010 to 7849.0400.

#### *B. REQUESTED EXEMPTIONS*

The Exemption Petition requests exemptions from the following requirements:

- Minn. R. 7849.0240 subp. 2(B)—Promotional Activities;
- Minn. R. 7849.0260 C(5)—Effect of Project on Rates Systemwide;
- Minn. R. 7849.0260 A(3) and C(6)—Losses;
- Minn. R. 7849.0260 D—System Map;
- Minn. R. 7849.0260 B(4) and (8)—Transmission Lines with Different Terminals or Substations;
- Minn. R. 7849.0270, subs. 1-6—Peak Demand and Annual Consumption Forecast and System Revenue Requirements;
- Minn. R. 7849.0280—System Capacity;
- Minn. R. 7849.0290—Conservation;
- Minn. R. 7849.0300—Consequences of Delay; and
- Minn. R. 7849.0340—No Facility Alternative.

In addition, the Applicants note that the ATC Arrowhead 345 kV/230 kV Substation is subject to an 800 megavolt-amp (MVA) limitation per a Minnesota Environmental Quality Board (MEQB) permitting exception issued in March 2001. The Applicants claim this limitation would need to be removed to facilitate the ISA Project as developed by MISO. Therefore, the Applicants request that the 800 MVA issue be moved to and resolved in this docket.<sup>3</sup>

The Department examines each exemption request separately. The required criterion is whether the Applicants have shown that “the data requirement is unnecessary to determine the need for the proposed facility or may be satisfied by submitting another document” as discussed above. The Department notes that similar exemptions were approved recently by the Commission in proceedings for other transmission lines resulting from the MISO’s LRTP process, which is also the source of the proposed ISA Project.<sup>4</sup>

### C. ANALYSIS OF EXEMPTION REQUESTS

#### C.1. 7849.0240 subp. 2(B)

Minn. R. 7849.0240, subp. 2(B) requires that a Certificate of Need application contain “an explanation of the relationship of the proposed facility to . . . promotional activities that may have given rise to the demand for the facility.” Minn. R. 7849.0010, subp. 24 defines promotional practices as meaning “any action or policies by an applicant, except those actions or policies that are permitted or mandated by statute or rule, which directly or indirectly give rise to the demand for the facility, including but not limited to advertising, billing practices, promotion of increased use of electrical energy, and other marketing activities.”

The Applicants request that the Commission grant ATC an exemption from this data requirement. In this case ATC does not directly serve end-users of electric service and does not engage in promotional activities that could give rise to the need for the proposed Project. MP would provide its relevant data. The Applicants also note that this request is consistent with several prior exemption requests approved by the Commission.<sup>5</sup>

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<sup>3</sup> As part of this request the Applicants propose to provide notice of this issue to parties in Docket Nos. E015/AI-11-75 and E015/PA-04-2020.

<sup>4</sup> For examples see: *In the Matter of the Application of Minnesota Power and Great River Energy for a Certificate of Need for the Northland Reliability Project 345 kV Transmission Line, Order Approving Requested Exemptions and Notice Plan*, June 21, 2023, Docket No. E015, ET2/CN-22-416, (eDockets) [20236-196704-01](#); *In the Matter of the Application for a Certificate of Need for the Big Stone South – Alexandria – Big Oaks Transmission Project, Order*, April 19, 2023, Docket No. E017, ET2, E002, ET10, E015/CN-22-538, (eDockets) [20234-194943-01](#).

<sup>5</sup> The Applicants cite the following precedents: *In the Matter of Application of Xcel Energy and ITC Midwest, LLC for the Huntley-Wilmarth 345 kV Transmission Line Project*, Commission, Order on Exemption Request, September 1, 2017, Docket No. E002, E6675/CN-17-184, (eDockets) [20179-135212-01](#). *In the Matter of the Application of Prairie Rose Wind, LLC for*

The Department agrees with the Applicants that the Commission's past practice is to exempt non-load serving entities from the data requirement regarding promotional practices. Therefore, the Department recommends that the Commission approve the requested exemption from Minn. R. 7849.0240, subp. 2(B) for ATC.

*C.2. Minn. R. 7849.0260 C(5)*

Minn. R. 7849.0260 C(5) requires that an application for a CN for a transmission line must include data regarding the "effect on rates systemwide and in Minnesota, assuming a test year beginning with the proposed in-service date."

The Applicants request that the Commission grant ATC an exemption from this data requirement. MP would provide its relevant data. ATC requests an exemption from this requirement because it is not a Minnesota public utility whose rates are regulated by the Commission. As a transmission-only utility, ATC's rates are regulated by the Federal Energy Regulatory Commission and the prices for providing transmission service are governed by the MISO tariff. The Applicants state that information regarding the expected Project cost, the multi-value project (MVP) cost allocation methodology, and the share that will be allocated to Minnesota utilities' load would be more useful in evaluating the Project, and as such, ATC will provide its relevant data as substitute information.

The Department agrees with the Applicants that, for ATC, the data most closely approximating the required information would be the alternative data proposed by ATC. Therefore, the Department recommends that the Commission approve the requested exemption from Minn. R. 7849.0260 C(5) for ATC with provision of the proposed alternative data.

*C.3. Minn. R. 7849.0260 A(3) and C(6)*

Minn. R. 7849.0260 A(3) requires an 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." Minn. R. 7849.0260 C(6) requires an applicant to provide "its efficiency, expressed for a transmission facility as the estimated losses under projected maximum loading and under projected average loading in the length of the transmission line and at the terminals or substations."

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*Certificate of Need for up to 200 MW wind project in Rock and Pipestone Counties, Commission, Order Approving Exemption Petition, May 14, 2010, Docket No. IP6838/CN-10-80, (eDockets) [20105-50463-01](#). In the Matter of the Application of Goodhue Wind for a Certificate of Need for a 78 MW Wind Project and Associated Facilities in Goodhue County, Commission, Order Finding Application Complete and Initiating Informal Review Process, December 30, 2009, Docket No. IP6701 /CN-09-1186, (eDockets) [200912-45523-01](#).*

The Applicants request an exemption from Minn. R. 7849.0260 A(3) and C(6). The Applicants propose to provide system losses information in lieu of line-specific losses required by the rules.

The Department agrees with the Applicants that the requested exemptions are consistent with several prior exemption requests approved by the Commission in other Certificate of Need transmission line dockets and is more relevant to the analysis.<sup>6</sup> Therefore, the Department recommends that the Commission approve the requested exemption from Minn. R. 7849.0260 A(3) and C(6) with the provision of the proposed alternative data.

*C.4. Minn. R. 7849.0260 D*

Minn. R. 7849.0260 D requires a map showing the applicant's system or load center to be served by the proposed project.

The Applicants request an exemption from Minn. R. 7849.0260 D for ATC only. ATC requests an exemption because a transmission-only company such as ATC does not directly serve load. ATC proposes to submit a map showing ATC's network of transmission lines in Minnesota and Wisconsin.

The Department agrees that a map showing ATC's transmission network is the relevant information. The Department recommends that the Commission approve the requested exemption from Minn. R. 7849.0260 D for ATC with the provision of the proposed alternative data.

*C.5. Minn. R. 7849.0260 B(4) and (8)*

Minn. R. 7849.0260 B(4) requires the Applicants provide "a discussion of the availability of alternatives to the facility, including but not limited to: [...] transmission lines with different terminals or substations." Minn. R. 7849.0260 B(8) requires the Applicants provide "a discussion of the availability of alternatives to the facility, including but not limited to: [...] any reasonable combinations of the alternatives listed in subitems (1) to (7)."

The Applicants note that Minn. Stat. § 216B.243, subd. 3(6) states in part that "the commission must not require evaluation of alternative end points for a high-voltage transmission line qualifying as a large energy facility unless the alternative end points are (i) consistent with end points identified in a

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<sup>6</sup> The Applicants cite the following examples; *In the Matter of the Application of Minnesota Power and Great River Energy for a Certificate of Need for the Northland Reliability Project 345 kV Transmission Line*, Commission, Order Approving Requested Exemptions and Notice Plan, June 21, 2023, Docket No. E015, ET2/CN-22-416, (eDockets) [20236-196704-01](#). *In re Application of Minnesota Power for a Certificate of Need for the Duluth Loop Reliability Project in St. Louis Cnty.*, Commission, Order Approving Notice Plan and Granting Variances and Exemptions, May 17, 2021, Docket No. E015/CN-21-140, (eDockets) [20215-174194-01](#).

federally registered planning authority transmission plan, or (ii) otherwise agreed to for further evaluation by the applicant.” In this case the Applicants have proposed end points that are consistent with MISO’s and do not consent to alternative end points.

The Department agrees with the Applicants that Minnesota Statutes limit the consideration of alternative end points in this matter and, therefore, an exemption is appropriate. The Department recommends that the Commission approve the requested exemption from Minn. R. 7849.0260 B(4) and (8).

*C.6. Minn. R. 7849.0270, subps. 1-6*

Minn. R. 7849.0270 subps. 1-6 contains data requirements related to forecasting peak demand and annual electrical consumption. In general, the rule requires forecast data regarding an applicant’s entire service area and system.

The Applicants state that the proposed Project is intended to:

- support the reliability of the regional transmission system, particularly in northern Minnesota and northwest Wisconsin;
- provide additional transmission capacity and regional transfer capacity to reliably integrate new renewable generation;
- meet growing electrical demand across the region; and
- strengthen the regional transmission grid.

Based upon these needs the Applicants propose to provide MP’s “most recent AFR (advanced forecast report) filed on July 1, 2025 in Docket No. E999/PR-25-11.”<sup>7</sup> In addition, the Applicants propose to provide a “discussion of the different regional demand scenarios evaluated in the analysis used by MISO to justify the Project.”<sup>8</sup> The Applicants’ claim is that the substitute information is better tailored to the need for the ISA Project. Throughout the discussion the Applicants note numerous dockets where the Commission has approved similar exemptions.<sup>9</sup>

The Department agrees that the information used by MISO when assessing the proposed Project would be more appropriate to assess need in this case than the information required by the rule. Therefore, the Department recommends that the Commission approve the requested exemption to Minnesota Rules 7849.0270 subparts 1 to 6 with the provision of the proposed alternative data.

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<sup>7</sup> Exemption Petition at 8.

<sup>8</sup> Exemption Petition at 9.

<sup>9</sup> Exemption Petition at 8-10.

C.7. *Minn. R. 7849.0280*

Minnesota Rules 7849.0280 requires an applicant for a CN to provide information that describes the ability of its existing system to meet forecasted demand; in essence, load and capability information.

The Applicants request that the Commission grant an exemption from Minn. R. 7849.0280. The Applicants note that the Commission has previously granted exemption requests from parts of Minn. R. 7849.0280 in several other transmission line Certificate of Need dockets where issues of transmission adequacy, rather than generation adequacy, were at issue.<sup>10</sup>

The Department agrees with the Applicants that the Commission has approved exemptions to Minn. R. 7849.0280, subps. (B) through (I) in similar circumstances. In essence, the Applicant's request the addition of Minn. R. 7849.0280, subp. (A) to the exemptions granted in the past. Minn. R. 7849.0280, subp. (A) requires "a brief discussion of power planning programs, including criteria, applied to the applicant's system and to the power pool or area within which the applicant's planning studies are based."

The information regarding power pool planning criteria could be of value in evaluating the proposed ISA Project. Therefore, the Department recommends that the Commission modify the requested exemption and approve the requested exemption to Minn. R. 7849.0280, subps. (B) through (I) only.<sup>11</sup>

C.8. *Minn. R. 7849.0290*

Minn. R. 7849.0290 requires various information be provided on an applicant's energy conservation and efficiency programs.

MP proposes to provide a summary of MP's Integrated Resource Plan and Conservation Improvement Plan filings. ATC requests a full exemption from Minn. R. 7849.0290. In addition to MP's information, the Applicants will also provide information regarding how conservation and energy efficiency was considered by MISO in its evaluation of the proposed ISA Project.

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<sup>10</sup> The Applicants cite the following examples; *In re Application of Minnesota Power for a Certificate of Need for the Duluth Loop Reliability Project in St. Louis Cnty.*, Commission, Order Approving Notice Plan and Granting Variances and Exemptions, May 17, 2021, Docket No. E015/CN-21-140, (eDockets) [20215-174194-01](#); *In re Application of Great River Energy and Minnesota Power for a Certificate of Need for the Menahga Area 115 kV Transmission Line Project in Hubbard, Wadena and Becker Counties, Minnesota*, Commission, Order Approving Exemption Request, December 3, 2014, Docket No. E015/CN-14-787, [201412-105142-01](#); *In re 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*, Commission, Order Approving Exemptions and Proposed Provision of Alternative Data, November 2, 2010, Docket No. E015, ET2/CN-10-973, [201011-56126-01](#).

<sup>11</sup> Note that the Commission did not grant a requested exemption to subpart A of the rule in Docket No. E015/CN-21-140, the Department's recommendation here is consistent with the precedent.

The Department agrees with the Applicants that, as ATC does not have end-use customers, a full exemption is appropriate for ATC. The Department also agrees with the Applicants that the Commission has approved exemptions to Minn. R. 7849.0290 for MP. The most relevant data is how MISO considered energy efficiency in determining the need for the proposed ISA Project. This information will better inform the record as to the need for the proposed ISA Project than the required information.

The Department recommends that the Commission approved the requested exemption to Minn. R. 7849.0290 with provision of the proposed alternative data.

*C.9. Minn. R. 7849.0300 and 7849.0340*

Minn. R. 7849.0300 requires an applicant for a CN to provide detailed information regarding the consequences of delay at three specific, statistically-based levels of demand and energy consumption. Minn. R. 7849.0340 requires an applicant for a CN to provide detailed information regarding the no build alternative at the same three statistically-based levels of demand and energy consumption.

The Applicants state they “will discuss the consequences of delay and a no build alternative in its application, there is no need to discuss these items in terms of three levels of demand.” In addition, the Applicants note that the Commission has approved similar partial exemption requests from the requirements of Minn. R. 7849.0300 and 7849.0340 in other transmission line Certificate of Need dockets.<sup>12</sup>

The Department agrees with the Applicants that information on the consequences of delay and a no build alternative tied to three specific, statistically-based levels of demand and energy consumption is not likely to be a useful part of the analysis for the proposed ISA Project and that a general discussion is appropriate; as noted in the Exemption Petition, similar exemptions were approved in other transmission CNs. Therefore, the Department recommends that the Commission approve the requested exemption to Minnesota Rules 7849.0300 and 7849.0340 with the provision of the proposed alternative data.

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<sup>12</sup> The Applicants cite the following examples; *In re Application of Minnesota Power for a Certificate of Need for the Duluth Loop Reliability Project in St. Louis Cnty.*, Commission, Order Approving Notice Plan and Granting Variances and Exemptions, May 17, 2021, Docket No. E015/CN-21-140, (eDockets) [20215-174194-01](#); *In re Application of Great River Energy and Minnesota Power for a Certificate of Need for the Menahga Area 115 kV Transmission Line Project in Hubbard, Wadena and Becker Counties, Minnesota*, Commission, Order Approving Exemption Request, December 3, 2014, Docket No. E015/CN-14-787, [201412-105142-01](#); *In re Request of Minnesota Power for a Certificate of Need for the Great Northern Transmission Line*, Commission, Order Approving Notice Plan, Granting Variance Request, and Approving Exemption Request, February 28, 2013, Docket No. E015/CN-12-1163, (eDockets) [20132-84248-01](#); *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*, Commission, Order Granting the Company’s Exemption Request, November 4, 2011, Docket No. E002/CN-11-826, [201111-68102-01](#).

*D. 800 MVA LIMIT*

The final issue in the Exemption Petition regards the 800 MVA limit placed by the MEQB in a March 2001 order granting a permitting exemption to MP for the construction of the Arrowhead – Weston 345 kV transmission line and the ATC Arrowhead 345 kV/230 kV Substation. The Applicants note that the permissions were later transferred to ATC in 2005 in Docket No. E015/PA-04-2020.<sup>13</sup>

As designed by MISO, the ISA Project would result in power flowing through the ATC Arrowhead 345/230 kV Substation into Wisconsin that would exceed 800 MVA. Therefore, the Applicants intend to request that the Commission remove the MEQB 800 MVA limit on power flow through the ATC Arrowhead 345/230 kV Substation. Regarding this future request, the Applicants recommend providing notice of the request to remove the 800 MVA limit via filing summary not only to the persons required under Minn. R. 7849 but also to the parties in Docket Nos. E015/AI-11-75 and E015/PA-04-2020.

The Department agrees with the Applicants that, since siting energy facilities has been moved to the Commission and the information regarding the impact of the ISA Project on the 800 MVA limit will be available in this docket, this docket is the correct place to review any issues regarding modifying or eliminating the 800 MVA limit. However, no Commission action is necessary; the Applicants can make any requests in their forthcoming CN petition that they deem advisable. The Department also agrees with the Applicants that, if a request to modify or eliminate the 800 MVA limit is made, the Commission should require additional notice.

The Department recommends that the Commission require the Applicants to provide notice of the request to change or remove the 800 MVA limit via filing summary not only to the persons required under Minn. R. 7849 but also to the parties in Docket Nos. E015/AI-11-75 and E015/PA-04-2020.

**IV. DEPARTMENT RECOMMENDATIONS**

Based on analysis of the information in the record, the Department has prepared recommendations, which are provided below. The recommendations correspond to the subheadings of Section III above.

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<sup>13</sup> See *In the Matter of Minnesota Power's Petition for Review of an Agreement Between Minnesota Power and American Transmission Company*, Commission, Order Approving Transfer Subject to Conditions, Requiring Further Filings, and Denying Reconsideration of Earlier Order on the Merits, December 2, 2005, Docket No. E015/M-04-2020, (eDockets) [2542187](#).

### C. ANALYSIS OF EXEMPTION REQUESTS

- C.1. *The Department recommends that the Commission approve the requested exemption from Minn. R. 7849.0240, subp. 2(B) for ATC.*
- C.2. *The Department recommends that the Commission approve the requested exemption from Minn. R. 7849.0260 C(5) for ATC with provision of the proposed alternative data.*
- C.3. *The Department recommends that the Commission approve the requested exemption from Minn. R. 7849.0260 A(3) and C(6) with the provision of the proposed alternative.*
- C.4. *The Department recommends that the Commission approve the requested exemption from Minn. R. 7849.0260 D for ATC with the provision of the proposed alternative data.*
- C.5. *The Department recommends that the Commission approve the requested exemption from Minn. R. 7849.0260 B(4) and (8).*
- C.6. *The Department recommends that the Commission approve the requested exemption to Minnesota Rules 7849.0270 subparts 1 to 6 with the provision of the proposed alternative data.*
- C.7. *The Department recommends the Commission modify the requested exemption and approve the requested exemption to Minn. R. 7849.0280, subps. (B) through (I) only.*
- C.8. *The Department recommends that the Commission approved the requested exemption to Minn. R. 7849.0290 with provision of the proposed alternative data.*
- C.9. *The Department recommends that the Commission approve the requested exemption to Minnesota Rules 7849.0300 and 7849.0340 with the provision of the proposed alternative data.*

### D. 800 MVA LIMIT

- *The Department recommends that the Commission require the Applicants to provide notice of the request to change or remove the 800 MVA limit via filing summary not only to the persons required under Minn. R. 7849 but also to the parties in Docket Nos. E015/AI-11-75 and E015/PA-04-2020.*

October 3, 2025

Sasha Bergman  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, Minnesota 55101-2147

RE: Comments of the Minnesota Department of Commerce  
Docket No. E015/CN-25-111

Dear Ms. Bergman,

The Department's comment in this matter recommended that the exemption request to the data required by Minn. R. 7849.0280 be limited to subparts (B) through (I) only; data should be provided regarding subpart (A)—a brief discussion of power planning programs.<sup>1</sup> In reply comments Minnesota Power (MP) and American Transmission Company LLC (ATC) agreed with the Department's recommendation and proposed to provide what they consider to be alternative data for subpart (A). MP proposes to provide MP's Annual Forecast Report; ATC proposes to provide load forecast information from its most recent 10-year assessment; and the applicants will also discuss data used by the Midcontinent Independent System Operator, Inc.<sup>2</sup>

The Department concludes that the data proposed by MP and ATC regarding Minn. R. 7849.0280 A is reasonable. The Department considers this issue to have been resolved and the Department's recommendations remain as stated in the Department's initial comments except as follows:

- *C.7. The Department recommends the Commission ~~modify the requested exemption and~~ approve the requested exemption to Minn. R. 7849.0280, subps. (B) through (I) only and approve the proposed alternative data regarding subp. (A).*

Sincerely,

/s/ Dr. SYDNIE LIEB  
Assistant Commissioner of Regulatory Analysis

SR/ar

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<sup>1</sup> *In the Matter of the Application for a Certificate of Need for the Iron Range – St. Louis County – Arrowhead 345 kV Transmission Line Project*, Department, Comment, August 27, 2025, Docket No. E015/CN-25-111, (eDockets), [20258-222450-02](#) at 7.

<sup>2</sup> *In the Matter of the Application for a Certificate of Need for the Iron Range – St. Louis County – Arrowhead 345 kV Transmission Line Project*, MP and ATC, Reply Comment, September 16, 2025, Docket No. E015/CN-25-111, (eDockets), [20259-223087-01](#) at 1-2.

## **CERTIFICATE OF SERVICE**

I, Robin Benson, hereby certify that I have this day, served a true and correct copy of the following document to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States mail at St. Paul, Minnesota.

### **Minnesota Public Utilities Commission ORDER**

Docket Numbers: **E-015/CN-25-111**

Dated this **18th** day of **November, 2025**

/s/ Robin Benson

<b>#</b>	<b>First Name</b>	<b>Last Name</b>	<b>Email</b>	<b>Organization</b>	<b>Agency</b>	<b>Address</b>	<b>Delivery Method</b>	<b>Alternate Delivery Method</b>	<b>View Trade Secret</b>	<b>Service List Name</b>
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