

Emily Johnson  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, MN 55101

April 23, 2026

***RE: In the Matter of the Application of Minnesota Power and American Transmission Company, LLC for a Certificate of Need and Route Permit for the Iron Range – St. Louis County - Arrowhead 345 kV Transmission Project. Docket Numbers: E015/CN-25-111; E015/TL-25-112***

**Submitted Via Email to:** [emily.johnson1@state.mn.us](mailto:emily.johnson1@state.mn.us)

Dear Ms. Johnson:

On behalf of the Midwest Tribal Energy Resources Association (MTERA), we submit the following comments on the Application of Minnesota Power and American Transmission Company, LLC for a Certificate of Need and Route Permit for the Iron Range – St. Louis County – Arrowhead 345 kV AC Transmission Project. MTERA appreciates the opportunity to engage in this matter due to our Member Tribes' inherent interests in the lands upon which the transmission project transects, which are founded on the established treaty rights of Midwest Tribes.

MTERA is a 501c3 Inter-Tribal Consortia serving 35 Midwest Tribes in MI, MN, and WI. MTERA's mission is to empower Tribes to manage Tribal energy resources through collective action. Although MTERA always seeks to represent consensus perspectives on any given issue, it is important to note that not all Member Tribes or Coalition partners agree upon the views expressed by MTERA. Further, it is also important to understand that interactions with MTERA do not substitute for Nation-to-Nation consultation, which can only be achieved through direct communications between federal, state and local governments and Tribal Nations.

MTERA is tribally led by our membership of 33 federally recognized Tribes, including 10 Tribes in Minnesota:

- Bois Forte Band of Chippewa
- Fond du Lac Band of Lake Superior Chippewa
- Grand Portage Band of Lake Superior Chippewa
- Leech Lake Band of Ojibwe
- Lower Sioux Indian Community
- Mille Lacs Band of Ojibwe
- Prairie Island Indian Community
- Red Lake Nation

- Shakopee Mdewakanton Sioux Community
- White Earth Nation

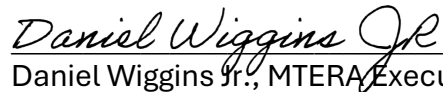
MTERA appreciates the MN PUC for establishing and maintaining ongoing consultation with all MN Tribes and our organization. As advocates for Midwest Tribal Nations' energy sovereignty, MTERA continues to address regional policy issues, including this transmission project. The following comments reflect input from our Member Tribes:

1. Like other significant applications that follow transmission routes that cross and potentially impact 1854 Treaty lands, there is a need for formal Tribal consultation with MTERA Member Tribes through the established consultation policies of the MN PUC and in direct coordination with the applicants. Formal consultation is needed to fully understand and mitigate the cultural and environmental impacts of the project as well as any potential impacts on the Tribal treaty rights of MN Tribes.
2. Recent news surrounding the proposed Hermantown hyperscale datacenter's non-disclosure agreements with the City of Hermantown has brought to light the potential impacts for many Tribal communities served by the applicant from the interconnection of large loads that this transmission upgrade will help serve.
3. The applicant needs to provide additional details on how large loads expected in the next few years could potentially increase regional energy prices for Tribal ratepayers. All ratepayers deserve to know how much their rates will increase as a result of this transmission application. Large load tariffs should be explored by the applicant to offset potential rate increases for all ratepayers, including Tribal communities in MN served by the applicant.
4. MTERA Member Tribes maintain ongoing concerns related to electrical rate increases that will be paid by ratepayers to help invest in these significant infrastructure upgrades proposed by all MN Investor-Owned Utilities (IOUs). It is difficult to determine whether the ballooning cost of these transmission projects will benefit ratepayers or simply allow allocation of that power to large loads like hyperscale datacenters proposed near this transmission project.
5. MTERA recommends that the MN PUC discuss, propose and include in the final permit stronger community benefits. For example, the applicant should include a detailed community benefits plan with a specific plan for each MN Tribe and the regional economy along the proposed corridor.
6. The current application needs to be clear and transparent as to the given "need" for the project isn't consistent with the existing need for public service to serve Tribal and local communities. The applicant must demonstrate, through a Community Benefits Plan, how Midwest Tribes will benefit from this transmission project rather than simply face higher energy bills. For example, MTERA recommends a final permit including a plan for specific allocations of power distributed from this project to Tribal communities along the route
7. In many rural areas along the transmission corridor, MTERA Member Tribes are often the top employer and play a critical role in the economic health of rural

communities. The applicant's Community Benefit Agreement must ensure that Tribes and regional economies experience the benefits that are proposed and included in the final permit.

MTERA appreciates the opportunity to submit these comments to ensure that this transmission project equitably considers Tribal priorities, respects Tribal sovereignty, and promotes clean energy access for all.

Respectfully submitted,



Daniel Wiggins Jr., MTERA Executive Director