

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

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. 7829.2550.¹ 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.”²

¹ *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”).

² [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 complied 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.³

³ 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.⁴
- 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 Board⁵ 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

⁴ See Attachment B-2 of the Notice Petition for detailed information.

⁵ 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.

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Comments on Notice Plan

Docket No. E015/CN-25-111

Dated this **27th** day of **August 2025**

/s/Sharon Ferguson

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
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2	Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	CN-25-111
3	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	CN-25-111
4	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	CN-25-111
5	James	Canaday	james.canaday@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota St. St. Paul MN, 55101 United States	Electronic Service		No	CN-25-111
6	Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	CN-25-111
7	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	CN-25-111
8	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St, Louis MO, 63119-2044 United States	Electronic Service		No	CN-25-111
9	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	CN-25-111
10	Hillary	Creurer	hcreurer@allete.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	CN-25-111
11	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	CN-25-111
12	Jackson	Evans	jjevens@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	CN-25-111
13	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-	Electronic Service		No	CN-25-111

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14	Eric	Fehlhaber	efehlhaber@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	CN-25-111
15	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	CN-25-111
16	Daryll	Fuentes	energy@usg.com	USG Corporation		550 W Adams St Chicago IL, 60661 United States	Electronic Service		No	CN-25-111
17	Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP		Suite 1750 220 South Sixth Street Minneapolis MN, 55402-1425 United States	Electronic Service		No	CN-25-111
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20	Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St. Paul MN, 55101 United States	Electronic Service		No	CN-25-111
21	Corey	Hintz	chintz@dakotaelectric.com	Dakota Electric Association		4300 220th Street Farmington MN, 55024-9583 United States	Electronic Service		No	CN-25-111
22	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	CN-25-111
23	Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	CN-25-111
24	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	CN-25-111
25	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	CN-25-111
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29	Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S 8th St Minneapolis MN, 55402 United States	Electronic Service		No	CN-25-111
30	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	CN-25-111
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33	Eric	Lipman	eric.lipman@state.mn.us		Office of Administrative Hearings	PO Box 64620 St. Paul MN, 55164-0620 United States	Electronic Service		No	CN-25-111
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36	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN, 55101-2131 United States	Electronic Service		No	CN-25-111
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42	Ellen	Nowak	ellen.nowak@wisconsin.gov	Public Service Commission of Wisconsin		4822 Madison Yards Way Madison WI, 53707 United States	Electronic Service		No	CN-25- 111
43	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	CN-25- 111
44	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	CN-25- 111
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47	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		No	CN-25- 111
48	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	CN-25- 111
49	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	CN-25- 111
50	Susan	Romans	sromans@allete.com	Minnesota Power		30 West Superior Street Legal Dept Duulth MN, 55802 United States	Electronic Service		No	CN-25- 111
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15	Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources		500 Lafayette Road Box 25 St. Paul MN, 55155-4040 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
16	Alan	Whipple	sa.property@state.mn.us		Minnesota Department Of Revenue	Property Tax Division 600 N. Robert Street St. Paul MN, 55146-3340 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
17	Jonathan	Wolfgram	jonathan.wolfgram@state.mn.us		Office of Pipeline Safety	445 Minnesota St Ste 147 Woodbury MN, 55125 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS