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March 31, 2026

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

Via E-Filing

Re: ***Iron Range – St. Louis County – Arrowhead 345 kV Transmission Line Project***
Combined Certificate of Need and Route Permit Application – Updated Agricultural Impact Mitigation Plan
Docket Nos. E015/CN-25-111 and E015/TL-25-112

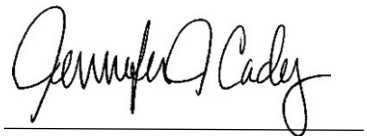
Dear Ms. Bergman:

On February 3, 2026, Minnesota Power and American Transmission Company LLC by and through its corporate manager ATC Management Inc. ("ATC") (collectively, the "Applicants") provided the Minnesota Public Utilities Commission ("Commission") a DRAFT Agricultural Impact Mitigation Plan ("AIMP") for the Iron Range – St. Louis County – Arrowhead 345 kilovolt ("kV") Transmission Line Project ("Project"), while also concurrently sending the DRAFT AIMP to the Minnesota Department of Agriculture ("MDA").

The MDA provided feedback on the DRAFT AIMP and the Applicants have incorporated MDA's suggestions into the DRAFT AIMP. The updated AIMP is included as **Attachment A** to this filing. A copy of correspondence with the MDA is included as **Attachment B**. The Applicants will share the updated AIMP with the MDA concurrent with this filing.

If you have questions or need additional information, please contact Drew Janke, Environmental Compliance Specialist, at djanke@mnpower.com.

Sincerely,



Jennifer Cady
ALLETE
Vice President – ALLETE Public Policy & External Affairs

Gregory Levesque
ATC
Vice President

cc: Service Lists

AGRICULTURAL IMPACT MITIGATION PLAN

IRON RANGE – ST. LOUIS COUNTY – ARROWHEAD 345 kV TRANSMISSION LINE PROJECT

Minnesota Power
and
American Transmission Company, LLC

Docket Nos. E015/CN-25-111
and E015/TL-25-112

January 2026

TABLE OF CONTENTS

1.0 INTRODUCTION

Minnesota Power and American Transmission Company, LLC by and through its corporate manager ATC Management, Inc ("ATC") (collectively, the "Applicants") developed this Agricultural Impact Mitigation Plan ("AIMP") with the Minnesota Department of Agriculture ("MDA") in compliance with Minnesota Statutes Section 216I.18, subdivision 3(b). The Applicants are jointly seeking a Certificate of Need and Route Permit from the Minnesota Public Utilities Commission to construct the Iron Range-St. Louis County-Arrowhead 345 kilovolt ("kV") Transmission Project (also the "Project" or "ISA Project"). The Project's Proposed Route includes approximately 0.5 percent (64 acres) cultivated cropland and 3.8 percent (509 acres) hay/pasture. According to the MDA's Organic Farm Directory and based on MDA correspondence, no registered organic producers are within the Proposed Route. The Applicants will determine who will obtain easements and construct portions of the Project later in the permitting process. The AIMP identifies measures the Applicants will take during construction to avoid, mitigate, minimize, repair, or provide compensation for impacts on Agricultural Land. The AIMP and its provisions will be implemented during construction and restoration activities taken prior to filing notice of completion of construction with the Minnesota Public Utilities Commission.

Capitalized words and other defined terms have the meanings given to them in this AIMP. Use of "Landowner" in this AIMP may be construed to read "Landowner and/or Tenant."

1.1 DEFINITIONS

Agricultural Land	Land that is actively managed for cropland, hayland, or pasture, and land in government set-aside programs.
AIMP	Agricultural Impact Mitigation Plan.
Applicants	Minnesota Power and ATC. May also include agents and contractors of Minnesota Power and ATC, where appropriate.
ATC	American Transmission Company, LLC
Certifying Agent	As defined by the National Organic Program Standards, Federal Regulations 7 CFR Part 205.2.
CFR	Code of Federal Regulations
Commission	Minnesota Public Utilities Commission.
Cropland	Land actively managed for growing row crops, small grains, horticultural crops, or hay.
Decertified or Decertification	Loss of Organic Certification.
Easement	The agreement(s) and/or interest in privately owned Agricultural Land held by the Applicants by virtue of which it has the right to construct, operate, and maintain the transmission line together with such other rights and obligations as may be set forth in such agreement.
Environmental/ Agricultural Monitor	Monitor retained by the Applicants responsible for overall project compliance with permit conditions and commitments made in this document. The Environmental/Agricultural Monitor shall also report directly to the MDA and will be responsible for auditing the Applicants' compliance with provisions of this AIMP. The monitor will have demonstrated experience on Agricultural Land that may include pipeline

	or electric transmission line construction.
Final Clean-up	Transmission line activity that occurs after the transmission line has been constructed. Final Clean-up activities may include: removal of construction debris, decompaction of soil as required, removal of temporary erosion control structures, final grading, restoration of fences, and required reseeding. Once Final Clean-up is finished, Landowners will be contacted to settle all damage issues and will be provided a form to sign acknowledging final construction settlement.
Landowner(s)	Person(s), or their representatives, holding legal title to Agricultural Land on the transmission line route from whom the Applicants are seeking, or have obtained, a temporary or permanent Easement. "Landowner(s)" includes Tenant(s), if any.
MDA	Minnesota Department of Agriculture.
Non-Agricultural Land	Any land that is not "Agricultural Land" as defined above.
Organic Agricultural Land	Farms or portions thereof described in the National Organic Program Standards, Federal Regulations 7 CFR Parts 205.100, 205.202, and 205.101.
Organic Buffer Zone	As defined by the National Organic Program Standards, Federal Regulations 7 CFR Part 205.2.
Organic Certification or Organic Certified	As defined by the National Organic Program Standards, Federal Regulations 7 CFR Part 205.100 and 7 CFR Part 205.101.
Organic System Plan	As defined by the National Organic Program Standards, Federal Regulations 7 CFR Part 205.2.
Prohibited Substance	As defined by the National Organic Program Standards, Federal Regulations 7 CFR Part 205.600 through 7 CFR 205.605 using the criteria provided in 7 USC 6517 and 7 USC 6518.
Project or ISA Project	Iron Range-St. Louis County-Arrowhead 345 kV Transmission Project in Minnesota.
Right-of-Way	The Land included in permanent and temporary Easements which the Applicants acquire for the purpose of constructing, operating and maintaining the transmission line.
Subsoil	Soil that is not "Topsoil" as defined below, and located immediately below Topsoil.
Tenant(s)	Any Person(s) lawfully renting or sharing land for agricultural production which makes up the right-of-way as defined in this AIMP.
Tile	Artificial subsurface drainage system.
Topsoil	The uppermost horizon (layer) of the soil, typically with the darkest color and highest content of organic matter.

This AIMP and its construction standards and policies apply only to construction activities occurring on privately owned Agricultural Land. If agricultural tile is encountered, whether on Non-Agricultural Land or Agricultural Land, the Applicants will implement construction standards relating to the repair of tile on Agricultural Lands discussed further in this AIMP. Portions of this

AIMP that identify standards and policies as they apply to Organic Agricultural Land apply only to the types of lands defined in the National Organic Program Rules (7 Code of Federal Regulations ["CFR"] Parts 205.100; 205.101, and 205.202). Further, construction standards and policies identified in this AIMP can be modified through an Easement or other agreement between the Applicants and the Landowner of Agricultural Land, as appropriate. In such case, the Easement or other agreement will control.

1.2 PURPOSE AND APPLICABILITY

The Applicants will negotiate in good faith with each Landowner of Agricultural Land to secure an agreement containing the conditions or provisions necessary to implement the provisions of this AIMP. The mitigative actions set forth in this AIMP are subject to negotiation and approval or change by Landowner of Agricultural Land, so long as such changes are negotiated with and acceptable to the Applicants. Mitigative actions will be executed by employees of the Applicants or by qualified contractors retained by the Applicants, unless otherwise specified or agreed upon by Landowner. The Applicants and Landowner may agree that certain activities will be performed by Landowner.

Unless otherwise specified in this AIMP or in an Easement or other agreement negotiated between the Applicants and Landowner, construction standards and policies or mitigative actions will be implemented within 90 days after completion of Final Clean-up activities on Agricultural Land. Weather conditions or other circumstances identified by mutual agreement between Landowner and the Applicants may delay implementation of mitigative actions after Final Clean-up. Where the Applicants determine it is practicable, the Applicants may make temporary repairs. These temporary repairs may be made to minimize additional property damage or interference with the Landowner's access to the subject Agricultural Land or to comply with federal or state permits and regulations.

The Applicants or their contractors will implement the construction standards and policies or mitigative actions identified within this AIMP so long as such activities do not conflict with any applicable federal or state rules, regulations, permits, licenses, approvals, or conditions obtained by the Applicants for the Project. Should any activity within this AIMP be determined to be unenforceable due to federal or state rules, regulations, permits, licenses, approvals, or conditions, the Applicants will inform the Landowner and will identify a reasonable alternative activity.

Prior to Right-of-Way preparation or construction, the Applicants will make a good faith effort to provide each Landowner with contact information, including a phone number and address that can be used to contact the Applicants regarding any impacts to Agricultural Land or other construction-related concerns or questions. The Applicants will provide updated information to the Landowner within a reasonable time of any change to the Applicants' contacts.

2.0 CONSTRUCTION STANDARDS

2.1 MITIGATIVE ACTIONS

The Applicants will reasonably restore and/or compensate Landowner, as appropriate, for damages caused by the Applicants as a result of transmission line construction, and as outlined in this AIMP. The Applicants will decide whether to restore land and/or compensate Landowner after a discussion with the Landowner.

2.2 ADVANCE NOTICE OF ACCESS

The Applicants will make good faith efforts to provide notice to the Landowner in advance of the commencement of initial construction activities on Agricultural Land. Notice may include personal contact, email, letter, or telephone contact.

2.3 ENVIRONMENTAL / AGRICULTURAL MONITOR

The Applicants will hire an Environmental/Agricultural Monitor to act as an independent third party to monitor compliance with this AIMP and other permit conditions/regulatory requirements. The Applicants will work with the MDA to select the Environmental/Agricultural Monitor.

The Applicants will coordinate with the MDA in developing written specifications for minimum experience and qualifications. After the MDA and the Applicants agree on minimum qualifications, the Applicants will provide a list of potential contractors to MDA. The Applicants will then meet with MDA to review the contractors and agree on the contractor to be pursued. The contract signed by the Applicants will specify minimum qualifications for Environmental/Agricultural Monitors and will direct the selected contractor to communicate independently with the MDA and set up a reporting relationship as the MDA instructs.

The Environmental/Agricultural Monitor will audit the Applicants' compliance with this AIMP. While the Environmental/Agricultural Monitor will not have the authority to direct construction activities and will not have authority to stop construction, if the Environmental/Agriculture Monitor observes a significant noncompliant activity, it will be reported to the Applicants' Environmental/Agricultural Monitor and/or Construction Manager immediately. The Environmental/Agricultural Monitor will work with construction management to identify and implement appropriate corrective actions, as needed. The MDA may also instruct the Environmental/Agricultural Monitor to report noncompliant activities to the MDA. If after reviewing the noncompliant activity and if judgment is made that continuing the activity will cause damage to the environment or agricultural land, the Applicants will issue a stop work order.

Specific duties of the Environmental/Agricultural Monitor will include, but are not limited to the following:

1. Participate in preconstruction training activities sponsored by the Applicants.

2. Monitor construction and restoration activities on Agricultural Land for compliance with provisions of this AIMP. The Environmental/Agricultural Monitor will be allowed full access to the Agricultural Land where construction occurs.

3. Report instances of noncompliance with the AIMP to the Applicants and the MDA.

4. Coordinate with the MDA to develop a reporting structure and report directly to the MDA on events or schedule as agreed upon with the MDA.

5. Coordinate communication of Landowner concerns to the Applicants and the MDA, if necessary.

6. Maintain a written log of Landowner concerns observed or reported by the Applicants' construction or land rights agents regarding compliance with this AIMP.

The written log should record whether the Environmental/Agricultural Monitor reported each logged concern to the MDA.

7. Be responsible for determining if weather conditions have caused the soil to become so wet that the activity to alleviate compaction would reduce the future production capacity of the land and advising the Applicants of these conditions. The Applicants will be solely responsible in making the decision on whether it will proceed with construction under these conditions. Compensation for a Landowner, as appropriate, will be determined as described in the "Procedures for Determination of damages and Compensation" section of this AIMP.

8. In disputes between the Applicants and a Landowner over restoration, advise the MDA on whether the agricultural restoration is reasonably adequate in consultation with the Applicants.

2.3.1 Qualifications and Selection of the Environmental/Agricultural Monitor

The Applicants' Environmental/Agricultural Monitor will:

1. have demonstrated practical experience with construction and restoration on Agricultural Land, preferably with pipeline or electric transmission line projects;

2. be responsible for verifying the Applicants' compliance with provisions of this AIMP during construction;

3. be trained in organic inspection by the Independent Organic Inspectors Association, if work is being performed on Organic Agricultural Land, unless the Environmental/Agricultural Monitor received such training during the previous three years;

4. work collaboratively with other members of the Applicants' teams in achieving compliance with this AIMP;

5. observe construction activities on Agricultural Land on a regular basis;

6. work with construction crews to ensure all practices are in compliance with the provisions of this AIMP;

7. document instances of noncompliance and work with construction personnel to identify and implement appropriate corrective actions as needed;

8. provide construction personnel with training on provisions of this AIMP before construction begins; and

9. provide construction personnel with field training on specific topics as needed.

2.4 POLE PLACEMENT

During the design of the Project, the Applicants' engineering, land rights, and permitting staff will seek input from the Landowner, as practicable, to address pole placement issues. Prior to

construction, the land rights agents will review the planned pole locations with the Landowner when requested to do so by the Landowner.

2.5 POLE REMOVAL

Where the Project is constructed along an existing transmission line, and where the Applicants will be collocating with existing facilities, the Applicants may remove existing transmission line structures. For transmission line structures that do not have a footing, the Applicants will extract the pole from the ground if possible. In the event a pole cannot be extracted by pulling, the Applicants will excavate an area and attempt to extricate an excavated pole entirely. If an excavated pole cannot be removed in its entirety, the pole will either be cut off at the excavated depth (in the range of approximately four (4) to five (5) feet) or pushed over if the pole cannot be cut. If an existing transmission structure to be removed has a concrete footing, the Applicants will work with the Landowner to determine at what depth, typically four feet deep, the footing must be removed so farming operations can continue on the property.

If the Applicants remove an existing pole, all support anchors for the structure will be removed. In these instances, the Applicants will work with the Landowner to identify any tile lines located near anchors prior to removal of the anchors. Additionally, if any damage to tile occurs as a result of pole or anchor removal, Applicants will adhere to the "Agricultural Tile" section of this AIMP.

2.6 AGRICULTURAL TILE

Applicants will contact an affected Landowner for Landowner's knowledge of tile locations prior to installation of the transmission line. The Applicants will attempt to identify tile if the Landowner does not know if tile is located at the proposed pole location. Tile that is damaged, cut, or removed as a result of the Applicants location efforts will be promptly repaired.

If tile is damaged by Project construction, the tile will be repaired with materials of the same quality as that which was damaged. If tiles on or adjacent to the transmission line construction area are adversely affected by construction, the Applicants will take such actions as are necessary to restore the tile function, including the relocation, reconfiguration, and replacement of the existing tile. The Applicants will correct tile repairs, as needed, after completion of the transmission line construction, provided the repairs were made by the Applicants or their agents or designees.

The affected Landowner may elect to negotiate a fair settlement with the Applicants, by which election the Landowner chooses to undertake the responsibility for repair, relocation, reconfiguration, or replacement of the damaged tile. In the event the Landowner chooses to undertake the responsibility for repair, relocation, reconfiguration, or replacement of the damaged tile, the Applicants will have no further liability for the identified damaged tile.

The following standards and policies apply to the tile repairs completed by the Applicants:

1. Tiles will be repaired with materials of the same or better quality as that which was damaged.

2. If water is flowing through a damaged tile, temporary repairs will be promptly installed and maintained until such time that permanent repairs can be made.

3. The Applicants will make efforts to complete permanent tile repairs within a reasonable timeframe after Final Clean-up, taking into account weather and soil conditions.

4. Following completion of the Final Clean-up and damage settlement, the Applicants will be responsible for correcting and repairing damages to tile systems that are discovered on the Right-of-Way to the extent that such damages are the result of Project construction. These damages are usually discovered after the first significant rain event. The Applicants will provide the Landowner with contact information should tile damage issues be identified after Final Clean-up. The Applicants will not be responsible for tile repairs performed by the Landowner.

The Applicants will be responsible for repairing areas as necessary to properly drain wet areas along the Right-of-Way caused by the construction of the Project.

2.7 SOIL COMPACTION/RUTTING

The Applicants will repair damage incurred due to compaction, ruts, erosion, and/or washing of soil caused by electric line construction. If, by mutual agreement, the Landowner repairs such damage, the Applicants will reimburse the Landowner for the reasonable cost of labor and the use of equipment to repair damage incurred due to compaction, ruts, erosion, and/or washing of soil caused by electric line construction. The Applicants will make such payments within a reasonable period of time following completion of Project construction and after receiving a statement substantiating the Landowner's repair costs.

If there is a dispute between the Landowner and the Applicants as to what areas need to be ripped or chiseled, the depth at which compacted areas should be ripped or chiseled, or the necessity for (or rates of) lime, fertilizer, and organic material application, the Applicants will consult with the Environmental/Agricultural Monitor prior to making a final decision.

2.8 EXCESS SOIL AND ROCKS

Excess soil and rock will be removed from the site unless otherwise requested by the Landowner. After Final Clean-up and restoration of Agricultural Lands, the Applicants will make good faith efforts to obtain written acknowledgment of completion of such activities from the Landowner.

2.9 CONSTRUCTION DEBRIS

The Applicants will promptly remove construction-related debris and material, which is not an integral part of the transmission line, from the Landowner's property at the Applicants' cost. Such material may include excess construction materials or litter generated by the construction crews. The Applicants will pay for the reasonable cost of repairs to the Landowner's equipment if the equipment is damaged by materials or debris the Applicants left on the property during construction.

2.10 PROCEDURES FOR DETERMINATION OF DAMAGES AND COMPENSATION

The Applicants will maintain a standardized procedure for processing Landowner claims for construction-related damages, including but not limited to crop damages. The procedure is intended to minimize Landowner concerns regarding the recovery of damages, to provide a

degree of certainty and predictability for Landowners and Applicants, and to foster good relationships among the Applicants and Landowners over the long term. A copy of the procedure will be provided at the request of the Landowner.

Damage claim negotiations between the Applicants and any affected Landowner will be voluntary in nature. The Applicants will offer to compensate Landowners according to the terms of the Project's damage claim policy in effect at the time the Easement is executed and recorded. The compensation offered is only an offer to settle, and the offer shall not be introduced in any proceeding brought by the Landowner to establish the amount of damages the Applicants must pay.

2.11 SOIL CONSERVATION PRACTICES

Topsoil and subsoil layers that are removed during construction for facility structures, pole placement, or temporary road impacts will be stored separately and replaced in the proper sequence after the transmission line is installed. Unless otherwise specified in an easement or other agreement negotiated between the Applicants and Landowner, the Applicants will not use topsoil for other purposes, including creating access ramps at road crossings. No topsoil or subsoil (other than incidental amounts) may be removed from agricultural land without permission of the Landowner.

Soil conservation practices, such as terraces and grassed waterways, which are damaged by the transmission line's construction will be restored to their pre-construction condition as near as practicable. The Applicants will attempt to work with the Landowner to identify and document the preconstruction conditions of these features.

2.12 IRRIGATION

If the transmission line and/or temporary work areas intersect an operational (or soon to be operational) spray irrigation system, the Applicants will work with the Landowner to establish an acceptable amount of time the irrigation system may be out of service.

If, as a result of the transmission line construction activities, an irrigation system interruption results in crop damages either on the Right-of-Way or off the Right-of-Way, Landowners will be compensated for resulting crop loss.

If practicable and mutually acceptable to the Applicants and the Landowner, temporary measures will be implemented to allow an irrigation system to continue to operate across land on which the transmission line is also being constructed. The Applicants will not allow an irrigation system to continue operation across land on which the transmission line is also being constructed if the Applicants determine that such operation would be unsafe.

2.13 ACCESS ROUTES/ TEMPORARY ROADS

The location of access routes to be used for construction purposes will be discussed with the Landowner.

1. The access routes will be designed so as to not impede proper drainage and will be built to mitigate soil erosion on or near the temporary roads.

2. If grading is required to create a temporary road, these temporary roads may be left intact through mutual agreement of the Landowner and the Applicants unless otherwise restricted by Federal, State, or local regulations.

3. If a temporary road is to be removed, the Agricultural Land upon which the temporary road is constructed will be returned to its previous use and restored to equivalent condition as existed prior to construction.

3.0 ORGANIC FARMS

The Applicants recognize that Organic Agricultural Land is a unique feature of the landscape and will treat this land with a similar level of care as other sensitive environmental features. This section identifies mitigation measures that apply specifically to farms that are Organic Certified or farms that are in active transition to become Organic Certified, and is intended to address the unique management and certification requirements of these operations. This section supplements and is in addition to all other protections provided in this AIMP.

No registered organic producers are within the Proposed Route, based on information from the MDA; however, in the event Organic Agricultural Land is identified, the following provisions will be implemented. The provisions of this section will only apply to Organic Agricultural Land for which the Landowner has provided to the Applicants a true, correct and current version of the Organic System Plan within 60 days after the signing of the Easement, or 60 days after the first contact by the Applicants after the Commission issues a Route Permit, whichever occurs first.

3.1 ORGANIC SYSTEM PLAN

The Applicants recognize the importance of the individualized Organic System Plan to the Organic Certification process. The Applicants will work with the Landowner, the Landowner's Certifying Agent, and/or a mutually acceptable third-party organic consultant to identify site-specific construction practices that will minimize the potential for Decertification as a result of construction activities. Possible practices may include, but are not limited to: equipment cleaning, planting a deep-rooted cover crop in lieu of mechanical decompaction, applications of composted manure or rock phosphate, preventing the introduction of disease vectors from tobacco use, restoration and replacement of beneficial bird and insect habitat, maintenance of organic buffer zones, use of organic seeds for any cover crop, or similar measures. The Applicants recognize that Organic System Plans are proprietary in nature and will respect the need for confidentiality.

3.2 PROHIBITED SUBSTANCES

The Applicants will avoid the application of Prohibited Substances onto Organic Agricultural Land. No herbicides, pesticides, fertilizers, or seed will be applied to Organic Agricultural Land unless requested and approved by the Landowner. Likewise, the Applicants will avoid refueling, fuel or lubricant storage, or routine equipment maintenance on Organic Agricultural Land. Equipment will be checked prior to entry to make sure that fuel, hydraulic, and lubrication systems are in good working order before working on Organic Agricultural Land. If Prohibited Substances are used on land adjacent to Organic Agricultural Land, these substances will be used in such a way as to prevent them from entering Organic Agricultural Land.

3.3 TEMPORARY ROAD IMPACTS

Topsoil and Subsoil layers that are removed during construction on Organic Agricultural Land for temporary road impacts will be stored separately and replaced in the proper sequence after the transmission line is installed. Unless otherwise specified in the site-specific plan described above, the Applicants will not use this soil for other purposes, including creating access ramps at road crossings. No Topsoil or Subsoil (other than incidental amounts) may be removed from Organic Agricultural Land. If additional Topsoil or Subsoil is needed, the Applicants will work with the Landowner's Organic System Plan. Likewise, Organic Agricultural Land will not be used for storage of soil from non-Organic Agricultural Land.

3.4 EROSION CONTROL

On Organic Agricultural Land, the Applicants will, to the extent feasible, implement erosion control methods consistent with the Landowner's Organic System Plan. On land adjacent to Organic Agricultural Land, the Applicants' erosion control procedures will be designed so that sediment from adjacent non-Organic Agricultural Land will not flow along the Right-of-Way and be deposited on Organic Agricultural Land. Treated lumber, nonorganic hay bales, non-approved metal fence posts, etc., will not be used for erosion control on Organic Agricultural Land.

3.5 WEED CONTROL

On Organic Agricultural Land, if the Applicants determine weed control is necessary during construction activities, the Applicants will, to the extent feasible, implement weed control methods consistent with the Landowner's Organic System Plan. Prohibited Substances will not be used for weed control within fifty (50) feet of posted Organic Agricultural Land.

3.6 MONITORING

In addition to the responsibilities of the Environmental/Agricultural Monitor described in the AIMP, the following will apply:

1. The Environmental/Agricultural Monitor will monitor construction and restoration activities on Organic Agricultural Land for compliance with the provisions of this section and will document any activities that may result in Decertification.

2. Instances of noncompliance will be documented according to Independent Organic Inspectors Association protocol consistent with the Landowner's Organic System Plan, and will be made available to the MDA, the Landowner, the Landowner's Certifying Agent, and to the Applicants.

3.7 COMPENSATION FOR CONSTRUCTION DAMAGES

The settlement of damages will be based on crop yield and/or crop quality determination and the need for additional restoration measures. The Applicants will first work with the Landowner of Organic Agricultural Land to determine crop yield. In the event the Applicants and the Landowner of Organic Agricultural Land cannot determine crop yield, at Applicants' expense, a mutually agreed upon professional agronomist will make crop yield determinations, and the MDA Fruit and Vegetable Inspection Unit or professional agronomist will make crop quality determinations. If the crop yield and/or crop quality determinations indicate the need for soil testing, the testing will be

conducted by a commercial laboratory that is properly certified to conduct the necessary tests and is mutually agreeable to the Applicants and the Landowner. Field work for soil testing will be conducted by a professional soil scientist or professional engineer licensed by the State of Minnesota. The Applicants will be responsible for the cost of sampling, testing, and additional restoration activities, if needed. Additional restoration activities will be completed according to the terms of its damage claim policy in effect at the time the Easement is executed and recorded.

3.8 COMPENSATION FOR DAMAGES DUE TO DECERTIFICATION

Should any portion of Organic Agricultural Land be Decertified as a result of construction activities, the Applicants will pay damages for crops and/or livestock within the area impacted by the lost Certification equal to the full difference between the market value of conventional crops and/or livestock and the market value of the organic crops and/or livestock lost for three years or the period of time necessary for the Landowner to regain Certification, whichever comes first. The market value of the crop will be determined as set forth in the damage claim policy. At the request of the Applicants, the Landowner shall provide verification of its loss of Organic Certification through the accredited certifying agent prior to any compensation for organic crop loss being paid.

4.0 REGISTERED APIARIES

Based upon a review of the MDA Minnesota Apiary Registry[1], there is one registered apiary within one mile of the Proposed Route. The apiary (MN-18506) is located approximately 0.7 mile north of the Proposed Route. The Route Permit may include mitigation measures relevant to apiaries, at the discretion of the Commission. If applicable, the Applicant will implement all mitigation measures deemed to be necessary by the Commission for protection of nearby apiaries.

[1] Minnesota Department of Agriculture (MDA). Minnesota Apiary Registry. Available online at BeeCheck MN - BeeCheck Map. Accessed January 2026.

From: Drew Janke (MP)
To: Roos, Stephan (MDA)
Subject: RE: [EXTERNAL MAIL] RE: MN Power ISA Transmission Project - AIMP
Attachments: image001.png
image002.png
image003.png
image004.png
image005.png
image006.png
image007.png
image008.png
image009.png
image010.png
image011.png
image012.png

Hi Steve,

We appreciate the prompt feedback and suggestion! We're going to make that update and I'll follow up when it's finalized.

Thank you,
Drew

Drew Janke
Environmental Compliance Specialist Senior
Minnesota Power | ALLETE, Inc.
30 West Superior Street
Duluth, MN 55802

O: 218-355-3569
C: 218-576-9213

From: Roos, Stephan (MDA) <stephan.roos@state.mn.us>
Sent: Wednesday, February 11, 2026 2:37 PM
To: Drew Janke (MP) <djanke@mnpower.com>
Subject: RE: [EXTERNAL MAIL] RE: MN Power ISA Transmission Project - AIMP

Hi Drew,
I went through the AIMP and it's great except for one thing - one of the primary issues addressed by AIMPs is the treatment of any excavated soil – in particular, that topsoil and subsoil will be segregated and not mixed together. Here's some example language from another project:

- Topsoil and subsoil layers that are removed during construction for facility structures, pole placement, or temporary road impacts will be stored separately and replaced in the proper sequence after the transmission line is installed. Unless otherwise specified in an easement or other agreement negotiated between the Company and Landowner, Xcel Energy will not use topsoil for other purposes, including creating access ramps at road crossings. No topsoil or subsoil (other than incidental amounts) may be removed from agricultural land without permission of the Landowner.

This bit could be possibly inserted somewhere around or in 2.11 Soil Conservation Practices.

Otherwise it's great.

Steve

Steve Roos
Environmental Review Program Manager, Energy and Environment Section
Agricultural Marketing and Development Division

Minnesota Department of Agriculture
625 Robert Street North
Saint Paul, MN 55155-2538
O: 657-201-6631
C: 612-968-7208
www.mda.state.mn.us

From: Drew Janke (MP) <djanke@mnpower.com>
Sent: Tuesday, February 3, 2026 4:34 PM
To: Roos, Stephan (MDA) <stephan.roos@state.mn.us>
Cc: Kirsch, Raymond (PUC) <raymond.kirsch@state.mn.us>; Lennon, Megan (MDA) <Megan.Lennon@state.mn.us>; Jim Atkinson (MP) <jbatkinson@mnpower.com>; Mandy

Bohnenblust <mandy.bohnenblust@merjent.com>
Subject: RE: [EXTERNAL MAIL] RE: MN Power ISA Transmission Project - AIMP

Good afternoon Steve,

Please see the attached draft AIMP for the proposed Iron Range – St. Louis County – Arrowhead 345 kilovolt (kV) Transmission Project ("ISA Project"). We'd greatly appreciate MDA's review and any comments or recommendations on this draft AIMP.

For your awareness, this draft AIMP was also filed to both the Certificate of Need and Route Permit MPUC dockets for the ISA Project this afternoon (Docket Nos. E015/CN-25-111 and E015/TL-25-112).

Again, just for awareness on where we're at in the process, the combined Certificate of Need and Route Permit application was filed on January 5th. The public information and scoping meetings are scheduled for next week (Feb. 10-12th).

Please let me know if you have any questions or would like to discuss.

Thank you in advance,
Drew

Drew Janke
Environmental Compliance Specialist Senior
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From: Roos, Stephan (MDA) <stephan.roos@state.mn.us>
Sent: Monday, November 24, 2025 10:48 AM
To: Drew Janke (MP) <djanke@mnpower.com>
Cc: Kirsch, Raymond (PUC) <raymond.kirsch@state.mn.us>; Lennon, Megan (MDA) <Megan.Lennon@state.mn.us>
Subject: [EXTERNAL MAIL] RE: MN Power ISA Transmission Project - AIMP

[EXTERNAL EMAIL] This email was sent from someone outside the

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company.

It may be cold out, but cyber-attacks don't slow down! Remember to freeze, think twice, and never click links, download attachments, or reply with personal information unless you recognize the sender and know the content is safe.

Hi Drew,
Sorry for the delay in responding. It's not because I didn't catch your message last week, I was doing a desktop survey and actually tried to trace the proposed route on aerial maps to see the potential for impact to ag lands. Based on the rather generalized map from you that I have available (totally understandable at this point), It was a bit challenging.

I do realize that there won't be much ag land impact overall, but the real issue we face at MDA is changing the precedent of our approach to 345kV lines – these really do catch the attention of the public, including the ag community, and we can't realistically treat a few farmers differently than a lot of farmers by dismissing the need for an AIMP.

By this point, AIMPs are fairly standardized and not especially difficult to produce, especially if there aren't any special conditions such as irrigation systems potentially impacted by interference or dairy operations potentially impacted by stray voltage. I didn't find either of these potential issues within the route corridor. I can't determine if any of the ag operations within the corridor are organic so I believe you are correct in assuming there are none.

So, at this point I'm inclined to require a standard AIMP for the project. It would memorialize the treatment and mitigation measures for ag land much better than permit conditions placed by the PUC. It would also serve as good PR in general, and especially to any farmers you need to interact with no matter how few. I'm not at all concerned if you want to wait a bit on preparing the AIMP to see if the final route avoids any agricultural land. My all-be-it quick desktop survey indicates that it might be possible, and the AIMP isn't due until the route approval is passed by the PUC.

If you want to discuss this, feel free to reach out to me and we can set up a call,
Steve

Steve Roos
Environmental Planner
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From: Drew Janke (MP) <djanke@mnpower.com>
Sent: Wednesday, November 19, 2025 2:52 PM
To: Roos, Stephan (MDA) <stephan.roos@state.mn.us>
Cc: Jim Atkinson (MP) <jbatkinson@mnpower.com>; Mandy Bohnenblust <mandy.bohnenblust@merjent.com>
Subject: RE: MN Power ISA Transmission Project - AIMP

Good afternoon Stephan,

Checking in to see if you've had a chance to review our below approach to not preparing an AIMP for the proposed ISA Transmission Line project. Please let me know if you have any questions or if it would be helpful to set up a discussion.

Thank you,
Drew

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From: Drew Janke (MP)
Sent: Monday, October 13, 2025 1:29 PM
To: 'stephan.roos@state.mn.us' <stephan.roos@state.mn.us>
Cc: Jim Atkinson (MP) <JBATKINSON@mnpower.com>; Mandy Bohnenblust <mandy.bohnenblust@merjent.com>
Subject: MN Power ISA Transmission Project - AIMP

Good afternoon Stephan,

Minnesota Power is proposing to construct the Iron Range – St. Louis County – Arrowhead 345 kilovolt (kV) Transmission Project ("ISA Project") and initially provided a project introduction letter on April 18, 2025 (attached) to the MDA. Minnesota Power is planning to submit a Certificate of Need and Route Permit application to the Minnesota in December 2025. According to National Land Cover Database ("NLCD") data, the Proposed Route includes about 64 acres of cultivated cropland and 509 acres of pasture/hay lands, and the right-of-way includes approximately 8.4 acres of cultivated cropland and 59.6 acres of pasture/hay lands. In addition, according to the Minnesota Department of Agriculture ("MDA") Organic Farm Directory, no registered organic producers are within the Proposed Route.

During construction, the proposed transmission structure locations will need to be accessed to install the structures and again to string conductors. Equipment used during construction will include backhoes, cranes, boom trucks, and assorted small vehicles. Operation of this equipment on adjoining farm fields can cause rutting and soil compaction, particularly during springtime and otherwise wet conditions. In the event drain tile is present in the project area, it may be impacted during construction and structure installation. Agricultural land could be temporarily taken out of production during construction; however, farming would resume after restoration is complete. Only structure locations (and associated guy wires, if present) would be precluded from future farming activities. These impacts could cause crop losses.

Based on a review of aerial photos and desktop information, the Proposed Alignment will not cross the edge of center-pivot irrigated fields. However, if center-pivot irrigated fields are identified during land acquisition, the Minnesota Power will work with the landowner to minimize impacts. The Applicants will work with landowners once a final route and alignment are permitted, to the extent practicable, to coordinate the need for any early harvest of crops that may be necessary. Applicants will work with landowners to minimize impacts on agricultural activities and will compensate the landowner for any crop damage or losses. Areas disturbed during construction will be repaired and restored to pre-construction conditions as required so that all surfaces drain naturally, blend with the natural terrain, and are left in a condition that will facilitate crop production or natural revegetation, provide for proper drainage, and prevent erosion.

Based on the limited impact anticipated to agricultural land, Minnesota Power does not anticipate preparing an Agricultural Impact Mitigation Plan for the ISA Project. We would be happy to have a call to discuss the Project in more detail and to obtain MDA's concurrence, in writing, that an AIMP is not necessary for this project.

We look forward to hearing from you. Please let me know if you have any questions.

Thank you,
Drew

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