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December 12, 2025

**VIA EFILING**

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

**Re: In the Matter of the Joint Application of Minnesota Power for a Site and Route Permit for the 85-megawatt Boswell Solar Project and Associated 2.45-mile 230 kilovolt Transmission Line in Itasca County, Minnesota**

Exceptions to the Administrative Law Judge's Findings of Fact, Conclusions of Law, and Recommendation

MPUC Docket Nos. E015/GS-24-425 and E015/TL-24-426

CAH Docket No. 24-2500-40695

Dear Ms. Bergman:

In accordance with the Amended Scheduling Order, ALLETE, Inc. d/b/a Minnesota Power provides this letter in response to the Findings of Fact, Conclusions of Law, and Recommendation ("ALJ Report") prepared by Assistant Chief Administrative Law Judge Kristien R. E. Butler for the 85-megawatt Boswell Solar Project and Associated 230 kilovolt transmission line (the "Boswell Solar Project"). Minnesota Power appreciates the thorough and detailed ALJ Report dated December 1, 2025, and takes no exceptions to the ALJ Report.

On December 10, 2025, the Minnesota Public Utilities Commission-Energy Infrastructure Permitting staff ("PUC-EIP") filed exceptions to the ALJ Report. In those exceptions, the PUC-EIP:

- 1) Requested a revision to Permit Condition 8.12 by adding: "The [Emergency Response Plan] shall include specific training and response plans for impacts related to 100-year storm and flooding events."

- 2) Stated its support for a Special Condition it proposed earlier in the proceeding that was not incorporated into the ALJ's recommendations for the Boswell Solar Project Site Permit.<sup>1</sup>

Minnesota Power takes no issue with respect to the revisions PUC-EIP identified to Permit Condition 8.12. These changes are consistent with what was proposed in the Draft Site Permit included with the Environmental Assessment to which Minnesota Power responded was an appropriate condition.<sup>2</sup>

As to PUC-EIP's request to include Special Condition 5.13 (related to tree replacement) in the Site Permit, Minnesota Power continues to support the ALJ Report and the finding that this "[S]pecial [C]ondition is not necessary" for the Project.<sup>3</sup> As stated in Minnesota Power's Response to Public Hearing Comments and in the ALJ Report, under Special Condition 5.1, Minnesota Power will develop a Visual Screening Plan that will include the planting of trees around the perimeter of the solar facility security fence and the Applicant has an ongoing tree planting program that would further mitigate tree removal impacts without the need for a Special Condition in the Site Permit.<sup>4</sup>

Minnesota Power understands that a condition similar to the one supported by PUC-EIP was first proposed in the summer of 2025 for a project proposed by an independent power producer.<sup>5</sup> Minnesota Power has a long history of contributions to the communities it serves. This includes a pre-existing and meaningful tree planting program. The program will donate approximately 150,000 trees to Itasca County over the next two years.<sup>6</sup>

For these reasons, the Special Condition supported by the PUC-EIP is unnecessary for the Boswell Solar Project. However, if the Commission concludes that Special Condition 5.13 should be included in the Site Permit, Minnesota Power requests that the revised version included in the ALJ Report and supported by the PUC-EIP be

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<sup>1</sup> The ALJ did consider this Special Condition requested by the PUC-EIP in the ALJ Report but elected not to recommend its inclusion in the Site Permit. ALJ Report at Finding 282.

<sup>2</sup> Ex. PUC-6 (Boswell Solar EA Appendix C – Draft Site Permit and Draft Route Permit) (eDocket No. [20258-222456-04](#)); Minnesota Power Comments on EA (Sept. 25, 2025) (eDocket No. [20259-223286-01](#)).

<sup>3</sup> ALJ Report at Finding 282.

<sup>4</sup> Minnesota Power Response to Public Hearing Comments at 4 (Oct. 16, 2025) (eDocket No. [202510-224048-01](#)); ALJ Report at Finding 282.

<sup>5</sup> *In the Matter of the Application of Iron Pine Solar Power, LLC for a Site Permit for the Iron Pine Solar Power Project in Pine County, Minnesota*, Docket No. IP-7114/GS-23-414, Order Point 3(e) (July 15, 2025) (eDocket No. [20257-220989-01](#)); *In the Matter of the Application of Iron Pine Solar Power, LLC for a Route Permit for a 230 kV Transmission Line in Pine County, Minnesota*, Docket No. IP-7114/TL-23-415, Order Point 3(e) (July 15, 2025) (eDocket No. [20257-220989-01](#)).

<sup>6</sup> Minnesota Power Response to Public Hearing Comments at 4 (Oct. 16, 2025) (eDocket No. [202510-224048-01](#)).

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used in the Site Permit and that Minnesota Power be allowed to include the cost of compliance with this condition in its cost recovery filing for the Project as recommended in the ALJ Report.

Minnesota Power respectfully requests that the Minnesota Public Utilities Commission adopt the ALJ Report, making the PUC-EIP requested revision to Permit Condition 8.12, and issue a Site and Route Permit for the Project.

If you have any questions about this filing, please contact me at [KVerhalen@Taftlaw.com](mailto:KVerhalen@Taftlaw.com).

Sincerely,

Taft Stettinius & Hollister LLP

A handwritten signature in blue ink, appearing to read "Kodi J. Verhalen", is positioned above the printed name.

Kodi J. Verhalen

## CERTIFICATE OF SERVICE

IN THE MATTER OF THE JOINT APPLICATION OF  
MINNESOTA POWER FOR A SITE AND ROUTE  
PERMIT FOR THE 85-MEGAWATT BOSWELL  
SOLAR PROJECT AND ASSOCIATED 2.45-MILE  
230 KILOVOLT TRANSMISSION LINE IN ITASCA  
COUNTY, MINNESOTA

CAH DOCKET No. 24-2500-40695  
MPUC DOCKET Nos. E015/GS-24-425  
& E015/TL-24-426

Carly L. Krause certifies that on the 12<sup>th</sup> day of December, 2025, on behalf of Minnesota Power, she efiled a true and correct copy of the **Exceptions to the Administrative Law Judge's Findings of Fact, Conclusions of Law, and Recommendation** by posting the same on [eDockets](#). Said document was served via U.S. Mail or email, as designated on the Official Service Lists on file with the Minnesota Public Utilities Commission in the above-referenced dockets.

/s/ Carly L. Krause  
Carly L. Krause

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 St, Paul MN, 55101 United States	Electronic Service		Yes	Official 24-425
2	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	Official 24-425
3	Kristien	Butler	kristien.butler@state.mn.us		Office of Administrative Hearings	PO Box 64620 Saint Paul MN, 55164 United States	Electronic Service		No	Official 24-425
4	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	Official 24-425
5	MP Regulatory	Compliance	mpregulatorycompliance@mnpower.com	Minnesota Power		30 W Superior St. Duluth MN, 55802 United States	Electronic Service		No	Official 24-425
6	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	Official 24-425
7	Drew	Janke	djanke@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	Official 24-425
8	Stacy	Kotch Egstad	stacy.kotch@state.mn.us		Minnesota Department of Transportation	395 John Ireland Blvd MS 678 St, Paul MN, 55155 United States	Electronic Service		No	Official 24-425
9	Jennifer	Kuklenski	jkuklenski@mnpower.com	Minnesota Power		30 W Superior St, Duluth, MN, 55802 Duluth MN, 54534 United States	Electronic Service		No	Official 24-425
10	Jessica	Livingston	jessica.livingston@state.mn.us		Department of Commerce	85 7th Place East Suite 280 Saint Paul MN, 55101 United States	Electronic Service		No	Official 24-425
11	Kevin	Pranis	kpranis@liunagroc.com		Laborers' District Council of MN and ND	81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	Official 24-425

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
12	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	Official 24-425
13	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix & Associates		7400 Lyndale Avenue South Suite 190 Richfield MN, 55423 United States	Electronic Service		No	Official 24-425
14	Tammy	Sundbom	tsundbom@mnpower.com	Minnesota Power		null null, null United States	Electronic Service		No	Official 24-425
15	Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP		80 S 8th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-425
16	Sarah	Whiting	swhiting@mnpower.com	Minnesota Power		30 W Superior St. Duluth MN, 55802 United States	Electronic Service		No	Official 24-425

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1	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 St, Paul MN, 55101 United States	Electronic Service		Yes	Official 24-426
2	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	Official 24-426
3	Kristien	Butler	kristien.butler@state.mn.us		Office of Administrative Hearings	PO Box 64620 Saint Paul MN, 55164 United States	Electronic Service		No	Official 24-426
4	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	Official 24-426
5	MP Regulatory	Compliance	mpregulatorycompliance@mnpower.com	Minnesota Power		30 W Superior St. Duluth MN, 55802 United States	Electronic Service		No	Official 24-426
6	Martin	Donovan	martin.donovan@state.mn.us		Department of Natural Resources	500 Lafayette Road St Paul MN, 55155 United States	Electronic Service		No	Official 24-426
7	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	Official 24-426
8	Drew	Janke	djanke@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	Official 24-426
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14	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix & Associates		7400 Lyndale Avenue South Suite 190 Richfield MN, 55423 United States	Electronic Service		No	Official 24-426
15	Tammy	Sundbom	tsundbom@mnpower.com	Minnesota Power		null null, null United States	Electronic Service		No	Official 24-426
16	Kacey	Trout	dctrout@paulbunyan.net			41753 County Road 23 Cohasset MN, 55721 United States	Electronic Service		No	Official 24-426
17	Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP		80 S 8th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-426
18	Sarah	Whiting	swhiting@mnpower.com	Minnesota Power		30 W Superior St. Duluth MN, 55802 United States	Electronic Service		No	Official 24-426