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June 2, 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*
Minnesota Power and American Transmission Company LLC Comments on Staff Briefing Papers and Preferred Decision Options
Docket Nos. E015/CN-25-111 and E015/TL-25-112

Dear Ms. Bergman:

Minnesota Power and American Transmission Company LLC by and through its corporate manager ATC Management Inc. (“ATC”) (collectively, the “Applicants”) submit these comments for consideration by the Minnesota Public Utilities Commission (“Commission”) as it considers the scope of an environmental assessment addendum (“EA Addendum”), environmental report (“ER”), and the draft permit prepared by Commission Energy Infrastructure Permitting (“PUC-EIP”) staff. The Applicants submit these comments to address PUC-EIP staff’s Route Alternative B, the development of cost information for any alternatives or special permit conditions, and Decision Option 10 regarding a stay of this proceeding. The Applicants also provide their preferred decision options for the Commission’s consideration.

As an initial matter, the Applicants appreciate the comprehensive review and summary of the proceedings to date provided by PUC-EIP staff in the briefing papers. The PUC-EIP staff provided a thorough analysis of the record to allow this Commission to make necessary decisions at this juncture.

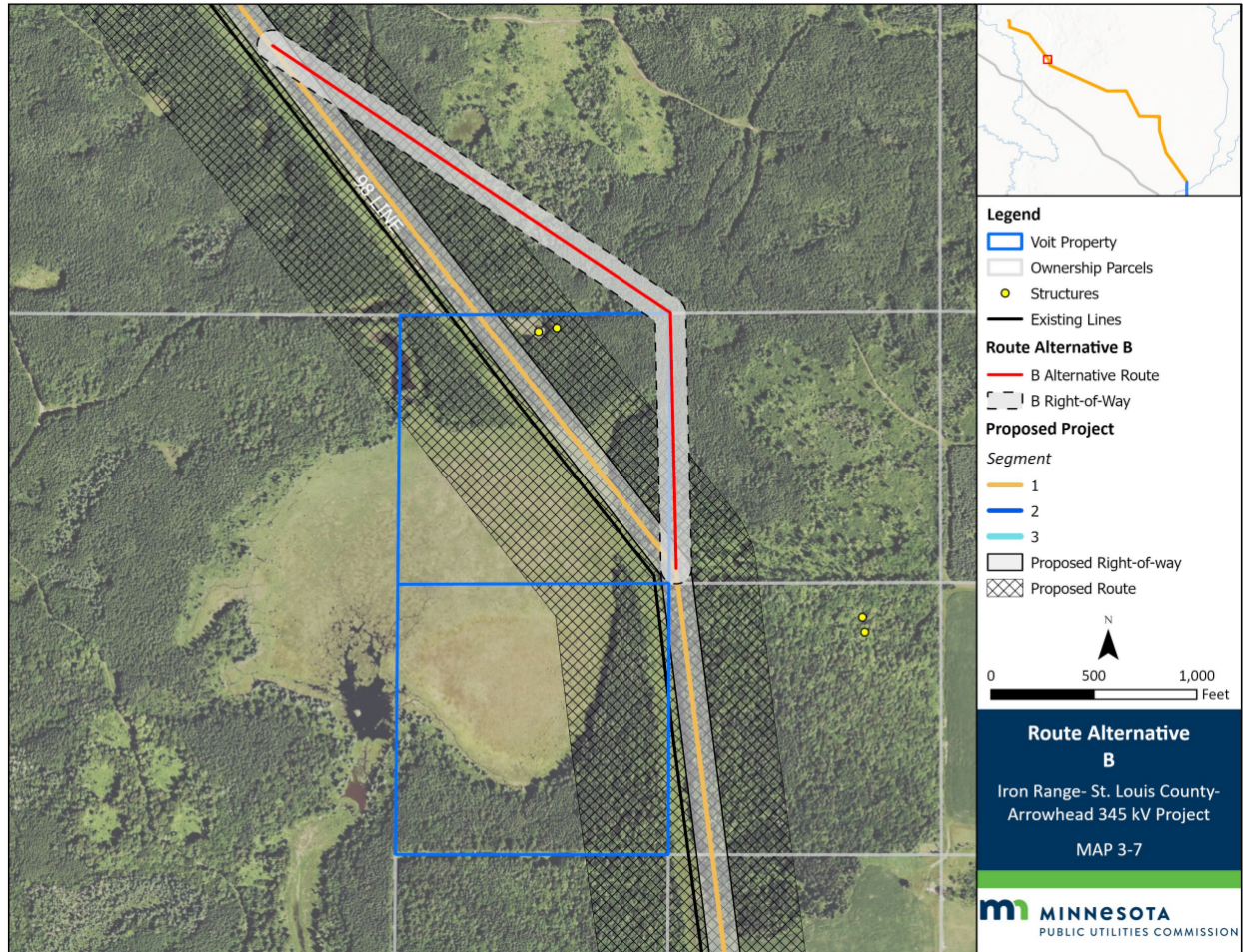
PUC-EIP Staff Route Alternative B

PUC-EIP staff developed Route Alternative B based on comments from the landowner along Minnesota Power’s existing 98 Line route in Segment 1 of the Project.¹ The Applicants now seek to clarify that Route Alternative B falls within the Applicants’ Proposed Route width for the Project and suggest that Route Alternative B could be reclassified as an Alignment

¹ Briefing Papers at 24 (May 27, 2026) (eDocket No. [20265-232259-01](https://www.puc.state.mn.us/eDocket/20265-232259-01)).

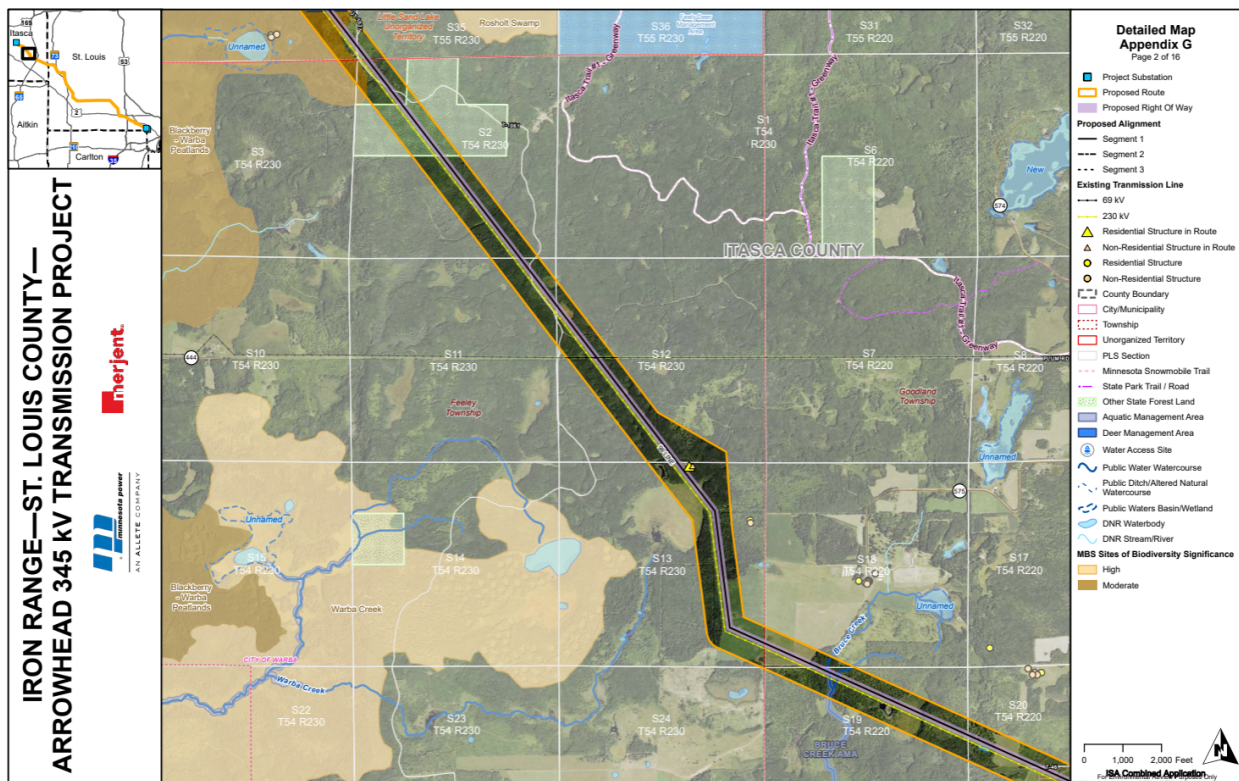
Alternative as it does not require a change to the Proposed Route. PUC-EIP staff identified Route Alternative B, shown in Figure 1.

Figure 1. Route Alternative B as Proposed by PUC-EIP Staff



Page 2 of the Detailed Map in Appendix G of the Combined Certificate of Need and Route Permit Application ("Application"), reproduced in Figure 2, below, shows the Proposed Route width near Route Alternative B.

Figure 2. Proposed Route Near Route Alternative B²



As shown in Figure 2, the Applicants expanded the Proposed Route width in this area to accommodate potential alignment alternatives.³ Because Route Alternative B falls within the Proposed Route width, the Applicants propose that the Commission reclassify Route Alternative B as Alignment Alternative AA-6. A map showing this alternative overlaid on the Proposed Route is included at **Attachment A** to this letter.

Cost and Constructability Impacts of Potential Alternatives and Special Permit Conditions

In light of the fact that the Project is a Midcontinent Independent System Operation (“MISO”) cost-allocated project, the Applicants want to emphasize the importance of ensuring that the record accurately reflects the costs and constructability considerations associated with any route alternatives, alignment alternatives, or special permit conditions developed during the proceeding. The Applicants will provide to PUC-EIP staff updated cost and constructability information related to any of the route alternatives, alignment alternatives, or special conditions under consideration in the EA Addendum (including the

² Application at Appendix G (Jan. 5, 2026) (eDocket No. [20261-226460-06](#)).

³ As stated in the Application, “[w]here the Proposed Route follows existing high-voltage transmission lines, the Applicants propose a route width of 1,000 to 5,250, feet to allow for routing of the Project on either side of the existing transmission lines.” Application at 100 (Jan. 5, 2026) (eDocket No. [20261-226460-03](#)).

ER analysis).⁴ The Applicants believe it is important to include this information in the EA Addendum to ensure it is provided contemporaneously to the public when the PUC-EIP staff publishes the environmental review documents and that the Commission has a complete record upon which to base its route decision.

Decision Option 10

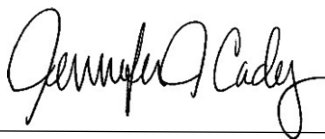
PUC-EIP staff included Decision Option 10 in the briefing papers. This decision option would stay this proceeding until the Commission adopts rules implementing Minn. Stat. § 216I, in connection with Ms. Carol Overland's Petition for Rulemaking in Docket No. E999/R-26-172. The Commission denied this Petition for Rulemaking at the May 28, 2026, agenda meeting.⁵ In light of this denial, which means no rulemaking will be undertaken by the Commission at this time, the Commission need not take any action on Decision Option 10.

Conclusion

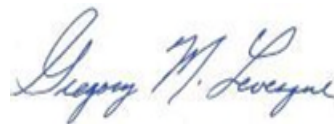
The Applicants remain available to provide PUC-EIP staff with information on any route, alignment, and system alternatives identified in the final scoping document, including information on constructability and feasibility, to aid in the PUC-EIP staff review and ensure this information is included in the EA Addendum.

The Applicants support Decision Options 1, 3 (modified to reclassify Route Alternative B as Alignment Alternative AA-6), 4, and 7, and do not object to Decision Option 9. If you have additional questions or need additional information, please contact Jennifer Kuklenski, Manager – Regulatory Strategy and Policy, at jkuklenski@mnpower.com.

Sincerely,



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

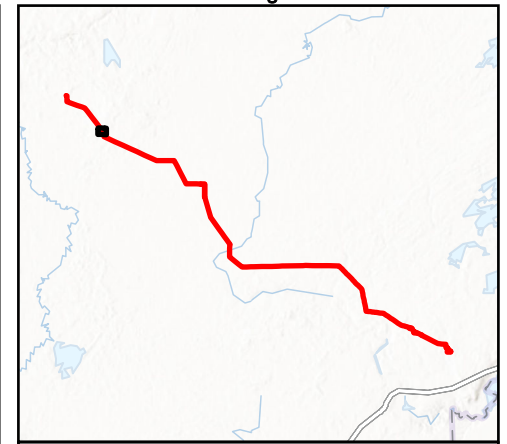
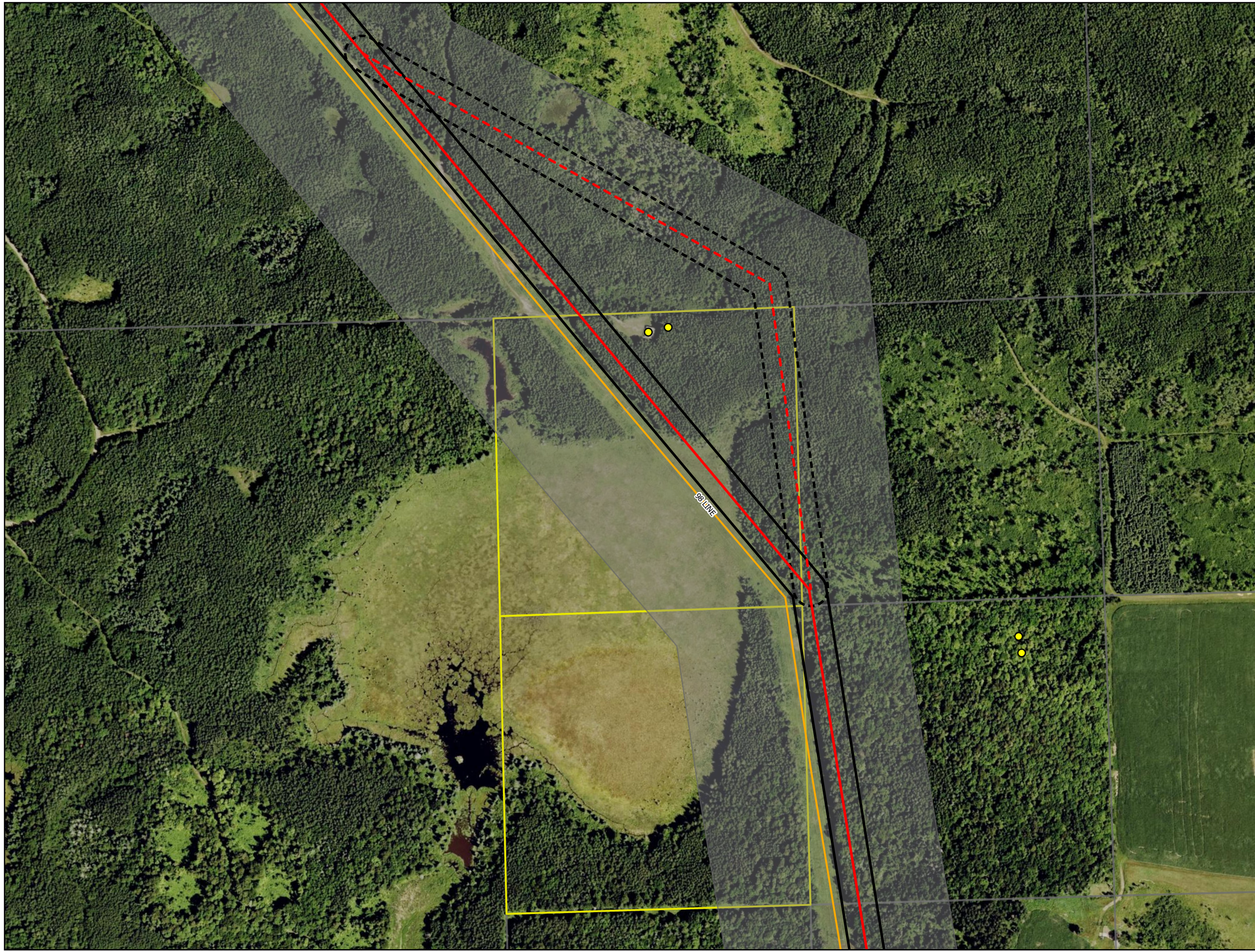


Gregory Levesque
ATC
Vice President

cc: Service Lists

⁴ The Applicants agree with the PUC-EIP staff's recommendation in the draft scoping decision included at Attachment A of the briefing papers that "the ER analysis will be included as part of the EA addendum." Briefing Papers at Attachment A at 3 (May 27, 2026) (eDocket No. [20265-232259-01](#)).

⁵ The Commission orally denied the Petition for Rulemaking at the May 28, 2026, agenda meeting. A written Order has not been published as of the date of this letter.



- Voit Property
- Parcel Boundary
- Structure
- Existing Line
- Route Alternative B**
- B Alternative Route
- B Right-of-Way
- Proposed Alignment**
- Segment 1
- Proposed Right-of-Way
- Proposed Route

Route Alternative B
Iron Range - St. Louis County -
Arrowhead 345kV
Transmission Line Project
 Itasca and St. Louis Counties, Minnesota



Date: (5/20/2026) Source: Z:\Clients\ML\FMIN_Power\SA_Project\WCCGIS\Permitting\Statehood_Anc\PrintSA_MIP_OC.aprx

IN THE MATTER OF THE APPLICATION FOR A
CERTIFICATE OF NEED AND ROUTE PERMIT FOR
THE IRON RANGE – ST. LOUIS COUNTY –
ARROWHEAD 345 KV TRANSMISSION PROJECT

DOCKET Nos. E015/CN-25-111
AND E015/TL-25-112

CERTIFICATE OF SERVICE

Carly L. Krause certifies that on the 2nd day of June, 2026, on behalf of Minnesota Power and American Transmission Company, she efiled a true and correct copy of the **Comments on Staff Briefing Papers** by posting the same on [eDockets](#). Said document was served via electronic service or U.S. Mail as designated on the attached Official Service Lists on file with the Minnesota Public Utilities Commission in the above-mentioned dockets.

/s/ Carly L. Krause _____
Carly L. Krause

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32	Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.		11 East Superior St Ste 125 Duluth MN, 55802 United States	Electronic Service		No	Official 25-112
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34	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 25-112
35	Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S 8th St Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-112
36	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	Official 25-112
37	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-112
38	Greg	Levesque	glevesque@atdlc.com				Electronic Service		No	Official 25-112
39	Eric	Lipman	eric.lipman@state.mn.us		Office of Administrative Hearings	PO Box 64620 St. Paul MN,	Electronic Service		No	Official 25-112

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55164-0620 United States				
40	Susan	Ludwig	sludwig@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	Official 25-112
41	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	Official 25-112
42	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	Official 25-112
43	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	Official 25-112
44	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-112
45	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-112
46	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	Official 25-112
47	Ellen	Nowak	ellen.nowak@wisconsin.gov	Public Service Commission of Wisconsin		4822 Madison Yards Way Madison WI, 53707 United States	Electronic Service		No	Official 25-112
48	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	Official 25-112
49	Carol A.	Overland	overland@legalectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	Official 25-112
50	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	Official 25-112
51	Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN,	Electronic Service		No	Official 25-112

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52	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		No	Official 25-112
53	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 25-112
54	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	Official 25-112
55	Susan	Romans	sromans@allete.com	Minnesota Power		30 West Superior Street Legal Dept Duulth MN, 55802 United States	Electronic Service		No	Official 25-112
56	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-112
57	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	Official 25-112
58	Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-112
59	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-112
60	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-112
61	Cary	Stephenson	cstephenson@otpco.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	Official 25-112
62	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-112
63	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	Official 25-112

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