



30 West Superior Street
Duluth, MN 55802-2093
www.mnpower.com



October 21, 2021

VIA ELECTRONIC FILING

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
350 Metro Square Building
121 Seventh Place East
St. Paul, MN 55101

Re: *In the Matter of the Application of Minnesota Power for a Certificate of Need for the Duluth Loop Reliability Project in St. Louis County*
MPUC Docket No. E015/CN-21-140

In the Matter of the Application of Minnesota Power for a Route Permit for the Duluth Loop Reliability Project in St. Louis County
MPUC Docket No. E015/TL-21-141

Dear Mr. Seuffert:

Minnesota Power hereby submits via e-filing its combined Application for a Certificate of Need and a Route Permit for the Duluth Loop Reliability Project (the "Project"). The Project includes: (1) construction of approximately 14 miles of new 115 kV transmission line between the Ridgeview, Haines Road, and Hilltop Substations; (2) construction of a new approximately one-mile extension connecting an existing 230 kV transmission line to the Arrowhead Substation; (3) upgrades to the Ridgeview, Hilltop, Haines Road, and Arrowhead substations; and (4) reconfiguration, rebuild, and upgrade to existing transmission lines and communications infrastructure in the Project area. The Project is needed to replace the system support once provided by coal-fired baseload generators located along Minnesota's North Shore by addressing severe voltage stability concerns, relieving transmission line overloads, and enhancing the reliability of Duluth-area transmission sources.

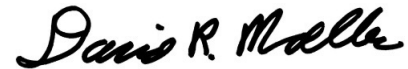
Please note that Minnesota Power has designated Appendix R of the Application as NONPUBLIC because it contains sensitive cultural and environmental information. Public and nonpublic versions of Appendix R have been provided.

The initial application fee payment required under Minn. R. 7849.0210 is being sent to the Minnesota Public Utilities Commission under separate cover. The initial application fee payment required under Minn. R. 7850.1800 and additional copies of the Application are being sent to the Department of Commerce under separate cover. A

short summary of this Application is being distributed as required by Minn. R. 7829.2500, subp. 3.

Please contact me if there are any questions or concerns. Minnesota Power looks forward to working with all parties interested in this proceeding.

Sincerely,

A handwritten signature in black ink that reads "David R. Moeller". The signature is written in a cursive, slightly slanted style.

David R. Moeller
Senior Attorney and
Director of Regulatory Compliance

TAFT STETTINIUS & HOLLISTER LLP

Valerie Herring
Kodi Verhalen
2200 IDS Center
Minneapolis, MN 55402
(612) 977-8400

ATTORNEYS FOR MINNESOTA POWER

Attachment
cc: Service Lists

STATEMENT REGARDING JUSTIFICATION FOR EXCISING TRADE SECRET INFORMATION

Pursuant to the Commission's revised Procedures for Handling Trade Secret and Privileged Data in furtherance of the intent of Minn. Stat. § 13.37 and Minn. Rule Part 7829.0500, Minnesota Power has designated portion of the attached Application as Trade Secret.

The Application requests approval of a Certificate of Need and a Route Permit for the Duluth Loop Reliability Project (the "Project"). Appendix R to the Application contains sensitive cultural and environmental information.

Minnesota Power believes that this statement justifies why the information excised from the attached filing should remain a trade secret under Minn. Stat. § 13.37. Minnesota Power respectfully requests the opportunity to provide additional justification in the event a challenge to the trade secret designation provided herein.

**STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

Katie J. Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

In the Matter of the Application of
Minnesota Power for a Certificate of Need
for the Duluth Loop Reliability Project in
St. Louis County

MPUC Docket No. E015/CN-21-140

SUMMARY OF CERTIFICATE OF NEED FILING

Pursuant to Minn. Stat. § 216B.243, Minnesota Power has submitted an application for a certificate of need for the Duluth Loop Reliability Project (the “Project”). The Project includes construction of new high voltage transmission lines and necessary substation and transmission infrastructure upgrades, reconfigurations, and rebuilds in St. Louis County, Minnesota. Pursuant to Minn. R. 7829.2500, subp. 2, Minnesota Power provides this summary of its Certificate of Need filing.

The Project is needed to replace the system support once provided by coal-fired baseload generators located along Minnesota’s North Shore by addressing severe voltage stability concerns, relieving transmission line overloads, and enhancing the reliability of Duluth-area transmission sources. The Project includes construction of a new 115 kV transmission line between the Ridgeview and Hilltop substations, construction of approximately a one-mile extension of an existing 230 kV transmission line, connecting to the Arrowhead Substation, and upgrades to the Ridgeview, Hilltop, Haines Road, and Arrowhead substations.

The Application is available on the Minnesota Public Utilities Commission’s e-Dockets webpage under the docket number listed above. It is also available on the Project webpage at: <https://www.mnpower.com/duluthloop>.

CERTIFICATE OF SERVICE

IN THE MATTER OF THE APPLICATION OF
MINNESOTA POWER FOR A CERTIFICATE OF NEED
FOR THE DULUTH LOOP RELIABILITY PROJECT IN
ST. LOUIS COUNTY

MPUC DOCKET No. E015/CN-21-140

IN THE MATTER OF THE APPLICATION OF
MINNESOTA POWER FOR A ROUTE PERMIT FOR
THE DULUTH LOOP RELIABILITY PROJECT IN ST.
LOUIS COUNTY

MPUC DOCKET No. E015/TL-21-141

Theresa Senart certifies that on the 21st day of October, 2021, on behalf of Minnesota Power, she efiled a true and correct copy of the **Certificate of Need Filing Summary and Combined Application for Certificate of Need and Route Permit** by posting the same on www.edockets.state.mn.us. Said documents are also 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/ Theresa Senart

Theresa Senart

Service List for MPUC Docket No. E015/CN-21-140: Paper Service – U.S. Mail

(Service is via a USB flash drive containing all public files for the Duluth Loop Combined Application with instructions on how to obtain a paper copy.)

Colleen Mueller
22186 State Hwy 4
Paynesville, MN 56362

Rod Schumacher
I&S Group
115 East Hickory Street Suite 300
Mankato, MN 56001

Service List for MPUC Docket No. E015/TL-21-141: Paper Service – U.S. Mail

(Service is via a USB flash drive containing all public files for the Duluth Loop Combined Application with instructions on how to obtain a paper copy.)

Pamela Elstad
6197 Monger Shaw Road
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jim	Atkinson	jbatkinson@allete.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140
David	Birkholz	david.birkholz@state.mn.us	MN Department of Commerce	Suite 500 85 7th Place East St. Paul, MN 551012198	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140
Michelle F.	Bissonnette	michelle.bissonnette@hdrinc.com	HDR Engineering, Inc.	Golden Hills Office Center 701 Xenia Ave S Ste 600 Minneapolis, MN 55416	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140
B. Andrew	Brown	brown.andrew@dorsey.com	Dorsey & Whitney LLP	Suite 1500 50 South Sixth Street Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000 Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140
PUC	CAO	consumer.puc@state.mn.us	Public Utilities Commission	Consumer Affairs Office 121 7th Place E Suite 350 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-140_Official Service List 21-140
Bill	Cook	bcook@rpu.org	Rochester Public Utilities	4000 East River Road NE Rochester, MN 55906	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140
John	Crane	johncranefishing@gmail.com	Fishing	1250 Wee Gwaus DR SW Bemidji, MN 56601	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140
Thomas	Davis	atdavis1972@outlook.com	-	1161 50th Ave Sherburn, MN 56171	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140
Patricia	DeBleeckere	tricia.debleeckere@state.mn.us	Public Utilities Commission	121 7th PI E St 350 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140
John E.	Drawz	jdrawz@fredlaw.com	Fredrikson & Byron, P.A.	Suite 4000 200 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140
Cory	Dutcher	cory.dutcher@ge.com	GE Power and Water	1 River Rd. Bldg. 37-413 Schenectady, NY 12345	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140
Kristen	Eide Tollefson	healingsystems69@gmail.com	R-CURE	28477 N Lake Ave Frontenac, MN 55026-1044	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140
Scott	Ek	scott.ek@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140
Kate	Fairman	kate.frantz@state.mn.us	Department of Natural Resources	Box 32 500 Lafayette Rd St. Paul, MN 551554032	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140
Annie	Felix Gerth	annie.felix-gerth@state.mn.us		Board of Water & Soil Resources 520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Karen A	Gebhardt	kageb1@gvtel.com		43901 253rd Ave Leonard, MN 56652-4026	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140
Larry	Hartman	Larry.Hartman@state.mn.us	Department of Commerce	85 7th Place East, Suite 280 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140
Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S. Eighth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140
Kari	Howe	kari.howe@state.mn.us	DEED	332 Minnesota St, #E200 1ST National Bank Bldg St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140
Scott	Johnson	Scott.Johnson@ci.medina.mn.us	City of Medina	2052 County Road 24 Medina, MN 55340-9790	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140
STACY	KOTCH EGSTAD	Stacy.Kotch@state.mn.us	MINNESOTA DEPARTMENT OF TRANSPORTATION	395 John Ireland Blvd. St. Paul, MN 55155	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140
Michael	Kaluzniak	mike.kaluzniak@state.mn.us	Public Utilities Commission	Suite 350 121 Seventh Place East St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140
Tom	Karas	tomskaras@gmail.com		3171 309th Ave NW Cambridge, MN 55008	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140
Adam	Kienberger	adam.kienberger@ci.rosemount.mn.us	City of Rosemount	2875 145th St W Rosemount, MN 55068	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140
Bruce	King	bruce@ranww.org	Realtors, Association of Northwestern WI	Suite 3 1903 Keith Street Eau Claire, WI 54701	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Chris	Kopel	chrisk@CMPASgroup.org	Central Minnesota Municipal Power Agency	459 S Grove St Blue Earth, MN 56013-2629	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140
Karen	Kromar	karen.kromar@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	Yes	OFF_SL_21-140_Official Service List 21-140
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140
Colleen	Mueller	N/A		22186 State Hwy 4 Paynesville, MN 56362	Paper Service	No	OFF_SL_21-140_Official Service List 21-140
Carol A.	Overland	overland@legalectric.org	Legaelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140
Kevin	Peterson	kjp@ibew160.org	IBEW Local 160	1109 Northway Lane NE Rochester, MN 55906	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140
Angela	Piner	angela.piner@hdrinc.com	HDR, Inc.	Suite 600 701 Xenia Avenue South Suite 600 Minneapolis, MN 55416	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Larry	Rebman	larryemls@hotmail.com	EMLS, Inc	PO Box 122 Appleton, MN 56208	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-140_Official Service List 21-140
Margaret	Rheude	Margaret_Rheude@fws.gov	U.S. Fish and Wildlife Service	Twin Cities Ecological Services Field Office 4101 American Blvd. E. Bloomington, MN 55425	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140
Stephan	Roos	stephan.roos@state.mn.us	MN Department of Agriculture	625 Robert St N Saint Paul, MN 55155-2538	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140
Rod	Schumacher	rod.schumacher@is-grp.com	I&S Group	115 E Hickory St Ste 300 Mankato, MN 56001	Paper Service	No	OFF_SL_21-140_Official Service List 21-140
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-140_Official Service List 21-140
Tom	Slukich	tom@nationalconductor.com	National Conductor Constructors	18119 Hwy 371 North Brainterd, MN 56401	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140
Adam	Sokolski	adam.sokolski@edf-re.com	EDF Renewable Energy	10 Second Street NE Ste 400 Minneapolis, MN 55410	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140
Mark	Strohfus	mstrohfus@greenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Carl	Strohm	cjsmg@sbcglobal.net	SBC Global	105 East Edgewood Ave Indianapolis, IN 46227	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140
Tom	Swafford	tswafford@umsi.us	Utility Mapping Services, Inc	3947 E Calvary Rd Suite 103 Duluth, MN 55803	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140
Todd	Tadych	ttadych@atcllc.com	American Transmission Company LLC	5303 Fen Oak Dr Madison, WI 53718	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140
Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP	80 S 8th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140
Caren	Warner	caren.warner@state.mn.us	Department of Commerce	85 7th Place East Suite 280 St. Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140
Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources	500 Lafayette Road Box 25 St. Paul, Minnesota 55155-4040	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140
Elizabeth	Wefel	eawefel@flaherty-hood.com	Flaherty & Hood, P.A.	525 Park St Ste 470 Saint Paul, MN 55103	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140
Deanna	White	dwhite@cleanwater.org	Clean Water Action & Water Fund of MN	330 S 2nd Ave Ste 420 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-140_Official Service List 21-140

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jay	Arntson	jayarntson@ymail.com	-	5529 Morris Thomas Rd Hermantown, MN 55810	Electronic Service	No	OFF_SL_21-141_TL-21-141
Jim	Atkinson	jbatkinson@allete.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	Yes	OFF_SL_21-141_TL-21-141
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-141_TL-21-141
Pamela	Elstad	N/A		6197 Monger Shaw Road Saginaw, MN 55779	Paper Service	No	OFF_SL_21-141_TL-21-141
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_21-141_TL-21-141
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-141_TL-21-141
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-141_TL-21-141

AFFIDAVIT OF MAILING

IN THE MATTER OF THE APPLICATION OF
MINNESOTA POWER FOR A CERTIFICATE OF NEED
FOR THE DULUTH LOOP RELIABILITY PROJECT IN
ST. LOUIS COUNTY

MPUC DOCKET No. E015/CN-21-140

IN THE MATTER OF THE APPLICATION OF
MINNESOTA POWER FOR A ROUTE PERMIT FOR
THE DULUTH LOOP RELIABILITY PROJECT IN ST.
LOUIS COUNTY

MPUC DOCKET No. E015/TL-21-141

STATE OF MINNESOTA)
) SS.
COUNTY OF HENNEPIN)

I, Brian Hunker of HDR Inc., hereby certify that on the 21st day of October, 2021, I directed to be sent in the manner indicated below a true and a correct copy of the Duluth Loop Combined Application and Appendices to all persons in the lists below. Service for MPUC Docket No. E015/CN-21-140 includes copies required by Minn. R. 7829.2500, subp. 3, and Service for MPUC Docket No. E015/TL-21-141 includes copies required by Minn. R. 7850.1700, subp. 1.

Minnesota Public Utilities Commission via United Parcel Service (UPS)

Bret Eknes 2145 Gardenette Drive N. White Bear Lake, MN 55110	Cezar Panait 6577 Sioux Lane Lino Lakes, MN 55014
Mr. Will Seuffert Executive Secretary Minnesota Public Utilities Commission 350 Metro Square Building 121 Seventh Place East St. Paul, MN 55101	

Minnesota Department of Commerce via UPS

William Cole Storm Environmental Review Manager Minnesota Department of Commerce Energy Environmental Review & Analysis Golden Rule Building 85 7th Place East, Suite 280, Saint Paul, MN 55101	Michael Zajicek Minnesota Department of Commerce Division of Energy Resources 85 7th Place East Suite 280 St. Paul, MN 55101
Sharon Ferguson MN Department of Commerce 85 7th Place East Suite 280 St. Paul, MN 5510	

Office of the Attorney General via UPS

Richard Dornfeld
Office of the Attorney General-EERA
445 Minnesota Street Suite 1800
St. Paul, MN 55101

Ian Dobson
Office of the Attorney General-RUD
445 Minnesota Street Suite 1400
St. Paul, MN 55101



Brian Hunker

Subscribed and sworn to before me
this 21 day of October, 2021



Notary Public

