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January 5, 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**  
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 this combined Application for a Certificate of Need and a Route Permit for the Iron Range – St. Louis County – Arrowhead 345 kilovolt (“kV”) Transmission Line Project (“Project”) to the Minnesota Public Utilities Commission (“Commission”).

The Project is needed to enhance grid reliability in the Upper Midwest as grid operating conditions become more variable, to increase grid efficiency and regional transfer capability as energy is transferred from where it is produced to where it is needed, and to meet the growing demand for reliable clean energy in the Upper Midwest. The Project was studied, reviewed, and approved as part of the Long-Range Transmission Plan Tranche 2.1 Portfolio by the Midcontinent Independent System Operator, the regional transmission operator, in December 2024.

The Project consists of construction of a new 345 kV double-circuit capable transmission line connecting Minnesota Power’s Iron Range Substation, Minnesota Power’s St. Louis County Substation, and ATC’s Arrowhead Substation. The Project makes extensive use of existing high-voltage transmission line rights-of-way by following along or replacing existing high-voltage transmission line rights-of-way for 92 percent of its 67.5-mile length. The modifications proposed at the Iron Range Substation will not require expansion of the fence line. The modifications proposed at the St. Louis County and Arrowhead Substations will require expansions to accommodate the necessary additional equipment for the Project.

The Applicants understand that the Commission will be issuing invoices for the application fees required under Minn. Stat. § 216I.28; Minn. R. 7849.0210; and Minn. R. 7849.2100. The invoiced fees will be paid out of Minnesota Power's existing funding account managed by the Department of Commerce. A short summary of this Application is being distributed as required by Minn. R. 7829.2500, Subp. 3 and the Commission's Order Approving the Notice Plan for the Project as noted on the attached certificate of service.

Please note that the Applicants have designated portions of Appendices K and S of the Application as NONPUBLIC. Public and nonpublic versions of the Appendices have been provided and a Trade Secret Justification is attached hereto.

Also, to ensure the orderly service of any information requests prior to the assignment of an administrative law judge to these proceedings, we ask that the following individuals receive service of any information requests during this interim period:

Jackson Evans	<a href="mailto:jjevans@mnpower.com">jjevans@mnpower.com</a>
Jim Atkinson	<a href="mailto:jbatkinson@mnpower.com">jbatkinson@mnpower.com</a>
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In a March 4, 2025 letter, Commission staff requested that the Applicants provide status updates every 45 days on the anticipated timing of the filing of the Certificate of Need and Route Permit application and in-service date for the Project until the application for the Project was filed. As required by this letter, the Applicants provided six status updates for this Project, the last of which was filed on November 10, 2025. As the Applicants are now filing the combined Application for a Certificate of Need and Route Permit for the Project, the Applicants will no longer be providing these 45-day status updates.

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If you have questions or need additional information, please contact Drew Janke, Environmental Compliance Specialist, at [djanke@mnpower.com](mailto:djanke@mnpower.com), or Jennifer Kuklenski, Manager – Regulatory Strategy and Policy, at [jkuklenski@mnpower.com](mailto:jkuklenski@mnpower.com).

Sincerely,

/s/ Jennifer Cady  
Jennifer Cady  
Minnesota Power  
Vice President – ALLETE Public  
Policy & External Affairs

/s/ Ellen Nowak  
Ellen Nowak  
ATC  
Vice President, State & Federal Affairs

cc: Attached Service Lists (Summary of Filing on Docket Nos. E015/AI-11-75, E015/PA-04-2020, E015/GR-23-155, Minnesota Power's General Service List, and the PPSA General List)

## **STATEMENT REGARDING JUSTIFICATION FOR EXCISING TRADE SECRET INFORMATION**

Pursuant to the Commission's Data Practices Policy – Not Public Data in Commission Proceedings in furtherance of the intent of Minn. Stat. § 13.37 and Minn. R. 7829.0500, Subp. 5, Minnesota Power and American Transmission Company LLC by and through its corporate manager ATC Management Inc. ("ATC") (collectively, the "Applicants") have designated portions of Appendices M and U of the enclosed Application for a Certificate of Need and a Route Permit for the Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project ("Project") as trade secret. A description of the excised information in these appendices are marked as trade secret are as follows:

- Appendix K – Minnesota Power's 2025 Annual Electric Utility Forecast Report. The excised material from this appendix contains confidential, competitive information about Minnesota Power's methods, techniques, and processes for supplying electric service. The excised material also includes energy usage by specific customers and generation by fuel type.
- Appendix S – Natural Heritage Information System, USFWS Species List, and Phase Ia Cultural Resources Literature Search. Portions of this appendix contain information about the locations of sensitive cultural resources that are not to be publicly disclosed.

The Applicants follow strict procedures to maintain the confidentiality of this excised information. The Applicants believe that this statement justifies why the information excised from the attached filing should remain a trade secret under Minn. Stat. § 13.37. The Applicants respectfully requests the opportunity to provide additional justification in the event of a challenge to the designation provided herein.