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April 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*  
Combined Certificate of Need and Route Permit Application – Comments to  
Clarify the Project Need**  
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 on the need for the Iron Range – St. Louis County – Arrowhead 345 kilovolt (“kV”) Transmission Line Project (“Project”). While the need for the Project is discussed in depth in the Combined Application for a Certificate of Need and Route Permit (“Application”) that was submitted to the Minnesota Public Utilities Commission (“Commission”) on January 5, 2026, the Applicants submit these comments to clarify the record in this proceeding as to the purpose of the Project and its relationship to other infrastructure projects currently in development in the Duluth and Hermantown areas.

Multiple comments have been filed in the Project dockets related to a proposed Google data center in Hermantown, MN.<sup>1</sup> The Applicants understand there are a number of infrastructure projects in development in northern Minnesota, including the data center and other transmission projects in the vicinity of the Applicants’ Arrowhead Substations.<sup>2</sup> The Applicants wish to add clarity and context to the record in this regard to assist the public in understanding how these various infrastructure projects may or may not be related. As with other transmission projects in this area that were previously approved by the Commission, including the Duluth Loop Transmission Project (Docket Nos. E015/CN-21-140 and E015/TL-21-141) and the High-Voltage Direct-Current (“HVDC”) Modernization Project (Docket Nos. E015/CN-

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<sup>1</sup> See e.g., Comment by Rebecca Gilbertson (Dec. 17, 2025) (eDocket No. [202512-226065-01](#)); Comment by Jonathan Thornton (Feb. 7, 2026) (eDocket No. [20262-227951-01](#)); Comment by Shyanne McGregor (Feb. 8, 2026) (eDockets No. [20262-227957-01](#)).

<sup>2</sup> The Project connects the Iron Range Substation (owned by Minnesota Power), the St. Louis County Substation (owned by Minnesota Power), and the Arrowhead Substation (owned by ATC). There is also an Arrowhead Substation that is owned by Minnesota Power located adjacent to the ATC Arrowhead Substation.

22-607 and E015/TL-22-611), the Project was proposed and justified to support grid reliability independently of the needs of any individual customer or data center, as described in the projects' respective Certificate of Need applications. To clarify the record, the Applicants provide a brief summary of the background and need for each transmission project below.

The Project, which is the subject of the current docket, is part of the Long Range Transmission Plan ("LRTP") Tranche 2.1 Portfolio developed by the Midcontinent Independent System Operator, Inc. ("MISO"). The LRTP Tranche 2.1 Portfolio, including the Project, was approved by the MISO Board of Directors in December 2024 after more than two years of rigorous analysis and stakeholder engagement opportunities facilitated by MISO.<sup>3</sup> While the MISO analysis that led directly to the approval of the Project as a part of the LRTP Tranche 2.1 Portfolio began in mid-2022, the LRTP effort itself goes back even further to the formalization of the MISO Reliability Imperative and the release of the MISO Renewable Integration Impact Assessment ("RIIA") in 2020 and early 2021.<sup>4</sup> In turn, the Reliability Imperative and the RIIA Report were themselves based on several years of renewable integration and future-focused reliability planning, such that the series of events leading to the approval of the Project by MISO in December 2024 can reasonably be traced to efforts originating more than a decade ago. While the Applicants participate in the MISO planning process, the development and justification of LRTP portfolios, including all of the individual projects, was undertaken by MISO for the purpose of identifying projects that are needed for *regional reliability*. As stated in the Application, the projects in the LRTP Tranche 2.1 Portfolio work together to form a regional transmission superhighway which is needed to increase the grid's capacity to deliver energy from where it is produced to where it is needed, relieve transmission congestion that increases the cost of energy, and enable cost-effective regional energy transfers that support economical grid operations.<sup>5</sup> Consistent with other projects in the LRTP Tranche 2.1 Portfolio, the Project was identified by MISO as needed to support regional reliability and is not intended to address the needs of any single customer.

MISO filed comments on April 1, 2026, explaining MISO's LRTP process.<sup>6</sup> Further, MISO confirmed that through its multi-year planning process, the Project was identified to "provide substantial reliability, economic, and public policy benefits to Minnesota, and contribute to continued development of a reliable and economical regional transmission system."<sup>7</sup>

Minnesota Power is also in the process of constructing two other transmission projects in Duluth and Hermantown that the Commission has previously evaluated for more localized reliability purposes. Both of these projects are owned solely by Minnesota Power.

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<sup>3</sup> *In the Matter of the Application for a Combined Certificate of Need and Route Permit for the Iron Range – St. Louis County – Arrowhead 345 kV Transmission Line Project*, Docket Nos. E015/CN-25-111, E015/CN-25-112, Application at 42 (Jan. 5, 2026) (eDocket No. [20261-226460-03](#)).

<sup>4</sup> *Id.* at 36-37.

<sup>5</sup> *Id.* at 29.

<sup>6</sup> *See In the Matter of the Application for a Combined Certificate of Need and Route Permit for the Iron Range – St. Louis County – Arrowhead 345 kV Transmission Line Project*, Docket Nos. E015/CN-25-111, E015/CN-25-112, Comments by MISO in Response to Notice of Complete Application and Public Information and Scoping Meetings (April 1, 2026) (eDocket No. [20264-229888-01](#)).

<sup>7</sup> *Id.* at 3.

- The Duluth Loop Transmission Line Project (Docket Nos. E015/CN-21-140 and E015/TL-21-141). The Duluth Loop Transmission Line Project involves the construction of new 115 kV and 230 kV transmission lines and upgrades to Minnesota Power's existing Ridgeview, Hilltop, Haines Road, and Arrowhead Substations. Historically, the transmission system in the Duluth area has been supported by several coal-fired baseload generation facilities located along Lake Superior's north shore. As Minnesota Power and its customers have transitioned away from reliance on coal to increasingly lower carbon sources of energy, the Duluth Loop Transmission Project was identified as necessary to replace the transmission system support once provided by these local coal-fired generators and maintain a continuous supply of safe and reliable electricity in the Duluth area. The Commission agreed that the Duluth Loop Transmission Project was needed for these purposes in 2023.<sup>8</sup>
- The HVDC Modernization Project (Docket Nos. E015/CN-22-607 and E015/TL-22-611). In Minnesota, the HVDC Modernization Project involves the construction of a new HVDC converter station, a new St. Louis County Substation, a new 345 kV transmission line between the new St. Louis County Substation and the new HVDC converter station, and a new double-circuit 230 kV transmission line between the new St. Louis County Substation and Minnesota Power's Arrowhead Substation. Additional construction associated with a new HVDC converter station will also occur on the North Dakota end of Minnesota Power's HVDC transmission line. The HVDC Modernization Project is primarily needed to replace infrastructure that was originally constructed in the 1970s and mitigate reliability impacts from outages due to increasing HVDC converter equipment failures, as well as continue to position Minnesota Power's grid for energy transition and improve the reliability of the local transmission system in Minnesota and North Dakota. The Commission agreed that the HVDC Modernization Project was needed for these purposes in 2024.<sup>9</sup>

As a Minnesota public utility, Minnesota Power also has an obligation to serve any customer that chooses to locate a residence or business within Minnesota Power's service territory. When a potential customer is a large load customer, like a taconite mining facility or data center, the customer will frequently work with Minnesota Power very early on in their evaluation process to ensure they understand what will be required of them if they construct their project in Minnesota Power's service territory. Planning for these types of customers is done by Minnesota Power through several processes, including Minnesota Power's formal transmission interconnection process if the customer proposes a direct connection to the transmission system. The purpose of the transmission interconnection process is to identify the upgrades necessary to reliably interconnect the customer. Under the process,

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<sup>8</sup> See *In the Matter of the Application of Minnesota Power for a Certificate of Need and Route Permit for the Duluth Loop Reliability Project in St. Louis County*, Minnesota, Docket Nos. E015/CN-21-140 and E-015/TL-21-141, ORDER GRANTING CERTIFICATE OF NEED AND ISSUING ROUTE PERMIT (April 23, 2023) (eDocket No. [20234-194456-02](#)).

<sup>9</sup> *In the Matter of the Application of Minnesota Power for a Certificate of Need and Transmission Line for the HVDC Modernization Project in Hermantown, Saint Louis County*, Docket Nos. E015/CN-22-607 and E-015/TL-22-611, ORDER GRANTING CERTIFICATE OF NEED AND ISSUING ROUTE PERMIT (Oct. 25, 2024) (eDocket No. [20234-194456-02](#)).

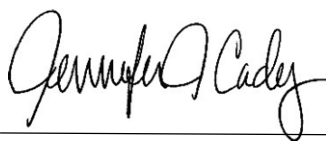
the customer is required to pay for these studies and any identified upgrade required to accommodate the new load. The upgrades and the obligation of the large load (or very large load) customers to pay for those upgrades will be memorialized in a Facility Construction Agreement (“FCA”) filed with the Federal Energy Regulatory Commission (“FERC”). FERC will review the FCA to ensure it does not result in unjust or unreasonable transmission rates. The FCA for the Google data center was filed with FERC on March 26, 2026. This Project is not listed as a required upgrade in the FCA. Minnesota Power also filed an electric service agreement for the Google facility on March 26, 2026.<sup>10</sup>

Further, any specific customer agreements negotiated with a very large load customer related to their utility service and rates are required to be evaluated and approved by the Commission. As to data centers, all Minnesota public utilities were required to develop a filing that explained how a utility would accommodate a new data center while ensuring that any such project would comply with Minn. Stat. § 216B.1622, including that all costs attributable to new large customers, such as data centers, are assigned to the very large customer class. Minnesota Power made its filing on February 18, 2026 in Docket No. E015/M-26-126.<sup>11</sup>

Thus, the Project is one of several transmission projects currently under development by Minnesota Power in Duluth and Hermantown. These projects are all necessary for local and regional reliability purposes whether or not a data center is eventually constructed in Hermantown. The Iron Range – St. Louis County – Arrowhead 345 kV Transmission Line Project was studied and developed by MISO for regional reliability purposes and will offer benefits for all electricity customers in the region.

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

Sincerely,



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ALLETE  
Vice President – ALLETE Public Policy &  
External Affairs



Gregory Levesque  
ATC  
Vice President

cc: Service Lists

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<sup>10</sup> See *In the Matter of the Petition for Approval of an Electric Service Agreement between Google and Minnesota Power*, Docket No. E015/M-26-159, Petition (March 27, 2026) (eDocket No. [20263-229694-01](#)).

<sup>11</sup> See *In the Matter of the Petition of Minnesota Power for Approval of Modifications to its Large Power Tariff*, Docket No. E015/M-26-126, Petition (Feb. 18, 2026) (eDocket No. [20262-228274-01](#)).