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August 7, 2025

Mike Bull
Acting Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

Via E-Filing

Re: Request for Exemptions

In the Matter of the Application for a Certificate of Need for the Iron Range – St. Louis County – Arrowhead 345 kV Transmission Line Project.
Docket No. E015/CN-25-111

Dear Mr. Bull:

Minnesota Power and American Transmission Company LLC by and through its corporate manager ATC Management Inc. (“ATC”) (collectively, the “Applicants”) respectfully submit this Request for Exemptions for Certain Certificate of Need Application Content Requirements to the Minnesota Public Utilities Commission pursuant to Minnesota Rule 7849.0200, subp. 6.

If you have questions or need additional information, please contact Jackson Evans, Minnesota Power’s legal counsel at jjevans@allete.com or 612.516.0682, or Eric Swanson, ATC’s legal counsel at eswanson@winthrop.com or 612.604.6511.

Sincerely,

/s/ Jackson J. Evans
Jackson J. Evans
Minnesota Power
FERC Counsel

/s/ Eric F. Swanson
Eric F. Swanson
Winthrop & Weinstine, P.A.
Counsel for ATC

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Hwikwon Ham	Commissioner
Audrey C. Partridge	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

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

Docket No. E015/CN-25-111

**REQUEST FOR EXEMPTIONS
FROM CERTAIN CERTIFICATE OF
NEED APPLICATION CONTENT
REQUIREMENTS**

I. INTRODUCTION

Minnesota Power and American Transmission Company LLC by and through its corporate manager ATC Management Inc. (“ATC”) (collectively, the “Applicants”) respectfully submit this request for exemption from certain requirements for a Certificate of Need Application for the Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project (“ISA Project” or “Project”) pursuant to Minn. R. 7849.0200, subp. 6. The Applicants intend to file a combined Application for a Certificate of Need and Route Permit for the ISA Project pursuant to Minn. Stat. §§ 216B.243 and 216I.05 in the first quarter of 2026.

The Project consists of construction of a new, approximately 62-mile-long, single-circuit 345 kV transmission line on double-circuit capable structures from Minnesota Power’s Iron Range Substation in Itasca County, Minnesota to Minnesota Power’s St. Louis County Substation in Solway Township, St. Louis County, Minnesota. The Project also requires construction of a new, approximately one-mile-long, double-circuit 345 kV transmission line from Minnesota Power’s St. Louis County Substation to ATC’s Arrowhead Substation in Hermantown, St. Louis County, Minnesota.

The Applicants believe that certain Certificate of Need application content requirements in Minn. R. Ch. 7849 should be modified to better address the nature of this Project. The Minnesota Public Utilities Commission (“Commission”) has granted similar exemptions for other transmission line projects in the recent past.¹ The Applicants therefore

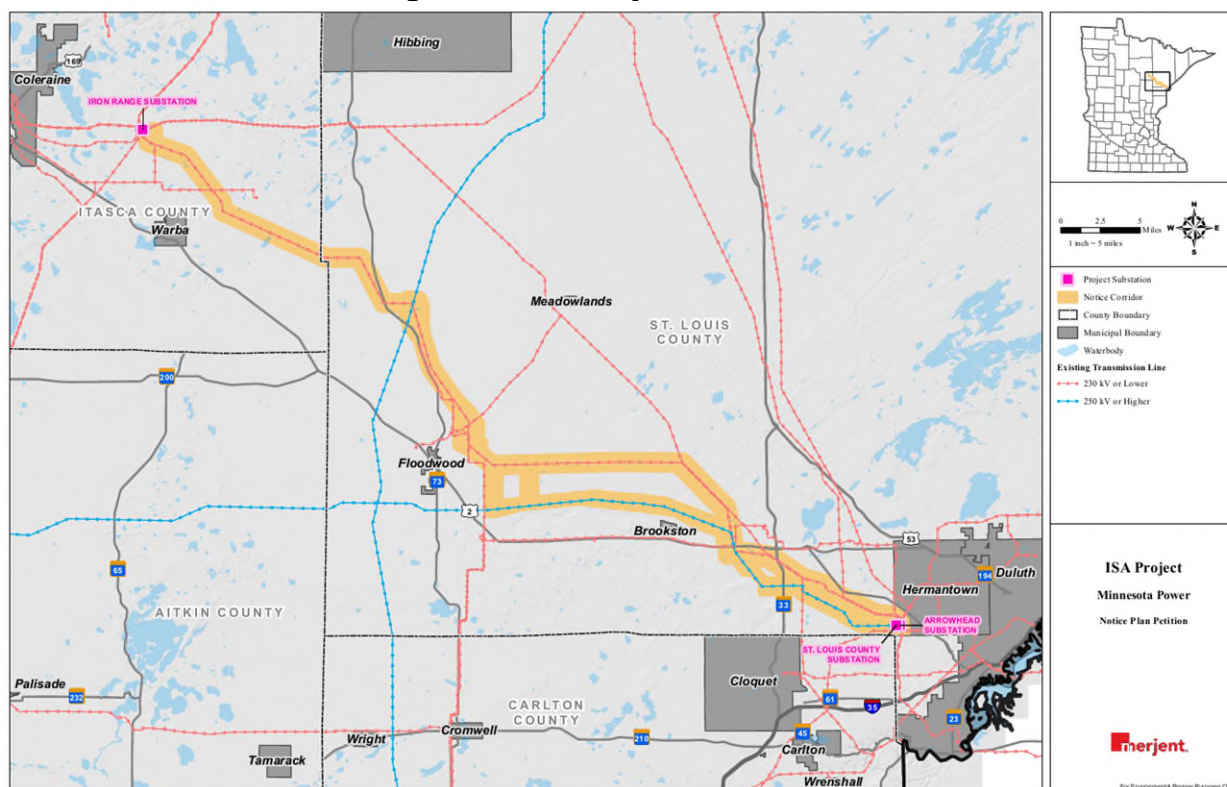
¹ See, e.g., *In the Matter of the Application of Minnesota Power and Great River Energy for a Certificate of Need for the Northland Reliability Project 345 kV Transmission Line*, Docket No. E015, ET2/CN-22-416,

respectfully request that the Commission grant exemptions from certain requirements as provided under Minn. R. 7849.0200, subp. 6. In lieu of some content requirements, the Applicants propose to submit alternative information that will better inform the Commission's decision regarding the need for the Project.

II. BACKGROUND

An overview of the ISA Project as well as other transmission facilities in the area is provided in Figure 1 below.

Figure 1. ISA Project Notice Area



The Project was studied, reviewed, and approved by the Midcontinent Independent System Operator, Inc. ("MISO") as part of its Long-Range Transmission Planning

ORDER APPROVING THE REQUESTED EXEMPTIONS AND THE NOTICE PLAN (June 21, 2023); *In re Application of Minnesota Power for a Certificate of Need for the Duluth Loop Reliability Project in St. Louis Cnty.*, Docket No. E015/CN-21-140, ORDER APPROVING NOTICE PLAN AND GRANTING VARIANCES AND EXEMPTIONS (May 17, 2021); *In the Matter of Application of Xcel Energy and ITC Midwest, LLC for the Huntley-Wilmarth 345 kV Transmission Line Project*, Docket No. E002, E6675/CN-17-184, [Order on Exemption Request] (Sept. 1, 2017); *In re Application of Great River Energy and Minnesota Power for a Certificate of Need for the Menahga Area 115 kV Transmission Line Project in Hubbard, Wadena and Becker Counties, Minnesota*, Docket No. E015/CN-14-787, ORDER APPROVING EXEMPTION REQUEST (Dec. 3, 2014); *In re Request of Minnesota Power for a Certificate of Need for the Great Northern Transmission Line*, Docket No. E015/CN-12-1163, ORDER APPROVING NOTICE PLAN, GRANTING VARIANCE REQUEST, AND APPROVING EXEMPTION REQUEST (Feb. 28, 2013)

("LRTP") Tranche 2.1 portfolio of projects included in the 2024 MISO Transmission Expansion Plan ("MTEP24"). The Project, as part of the LRTP Tranche 2.1 portfolio, is needed to enhance grid reliability in the Upper Midwest as grid operating conditions become more variable, increase grid efficiency as energy is transferred from where it is produced to where it is needed, and meet the growing demand for reliable clean energy in the Upper Midwest.

III. LEGAL STANDARD AND SUMMARY OF EXEMPTION REQUESTS

Minn. R. 7849.0220, subp. 2, part 7849.0240, and parts 7849.0260 to 7849.0340 specify the content requirements for Certificate of Need applications for large high-voltage transmission line ("LHVTL") projects. The Commission has authority to grant exemptions from the requirements of Minn. R. Ch. 7849 pursuant to Minn. R. 7849.0200, subp. 6, which provides:

Before submitting an application, a person is exempted from any data requirement of parts 7849.0010 to 7849.0400 if the person (1) requests an exemption from specified rules, in writing to the commission, and (2) shows that the data requirement is unnecessary to determine the need for the proposed facility or may be satisfied by submitting another document. A request for exemption must be filed at least 45 days before submitting an application. The commission shall respond in writing to a request for exemption within 30 days of receipt and include the reasons for the decision. The commission shall file a statement of exemptions granted and reasons for granting them before beginning the hearing.

Based on the standard set forth in this rule, the Commission may grant exemptions when the data requirements: (1) are unnecessary to determine need in a specific case; or (2) can be satisfied by submitting documents other than those required by the rules.² For the ISA Project, the Applicants request that the Commission grant exemptions from the following rules as they are either unnecessary to determine the need for the Project or can be satisfied by submitting alternative data:

Minnesota Rule	Scope of Exemption
Minn. R. 7849.0240 subp. 2(B) (Promotional Activities)	Request full exemption for ATC from the requirement to provide data regarding the relationship of the project and promotional activities that may have given rise to the demand for the facility.
Minn. R. 7849.0260 C(5) (Effect of Project on Rates Systemwide)	As to ATC, request to submit alternative data in the form of the estimated Multi-

² *In re Application for a Certificate of Need for the Appleton – Canby 115 kV Line*, Docket No. E017/CN-06-0677, ORDER GRANTING EXEMPTIONS AND APPROVING NOTICE PLAN (Aug. 1, 2006).

	Value Project (“MVP”) revenue requirement and cost allocation calculations showing costs that will be allocated to Minnesota utilities for the Project. Minnesota Power will provide relevant data related to effects on its rates systemwide, per Minn. R. 7849.0260 C(5).
Minn. R. 7849.0260 A(3) and C(6) (Losses)	Request an exemption from providing Project-specific loss information. The Applicants propose to provide substitute data in the form of overall system losses.
Minn. R. 7849.0260 D (System Map)	As to ATC, request to submit an alternative map of ATC’s transmission network in Minnesota and Wisconsin.
Minn. R. 7849.0260 B(4) and (8) (Transmission Lines with Different Terminals or Substations)	Request an exemption from providing a discussion on the availability of alternative transmission lines with different terminals or substations. The commission must not require evaluation of alternative end points for a high-voltage transmission line qualifying as a large energy facility unless the alternative end points are (i) consistent with end points identified in a federally registered planning authority transmission plan, or (ii) otherwise agreed to for further evaluation by the applicant. ³
Minn. R. 7849.0270, subps. 1-6 (Peak Demand and Annual Consumption Forecast; System Revenue Requirements)	Request exemption from providing forecasting and capacity information for the Applicants’ systems and to instead provide forecast information from Minnesota Power’s most recent Annual Forecast Report (“AFR”). The Applicants also seek an exemption from providing annual revenue requirements for the Project. Minnesota Power proposes to provide the general rate impact of the Project on Minnesota Power’s customers.
Minn. R. 7849.0280 (System Capacity)	Request full exemption from providing a discussion of the ability of the existing system to meet the forecasted demand for electrical energy identified in response to Minn. R. 7849.0270.
Minn. R. 7849.0290 (Conservation) (Minnesota Power)	Request exemption from discussing conservation programs and their effect on

³ See Minn. Stat. § 216B.243, subd. 3(6).

	the forecast information required by Minn. R. 7849.0290. Minnesota Power proposes to provide substitute information on its conservation efforts from, as applicable, Minnesota Power's most recent Conservation Improvement Plan and Integrated Resource Plan filings. Minnesota Power will also provide information regarding how conservation and energy efficiency was considered by MISO in its evaluation of the Project.
Minn. R. 7849.0290 (Conservation) (ATC)	Request full exemption for ATC.
Minn. R. 7849.0300 (Consequences of Delay)	Request exemption from providing analysis using three confidence levels. The Applicants propose to provide substitute data regarding potential impacts caused by delay in implementing the Project.
Minn. R. 7849.0340 (No Facility Alternative)	Request to be exempt from providing analysis using three confidence levels. The Applicants propose to provide substitute data regarding potential impacts caused by no build alternatives.
800 MVA Exemption	
The ATC Arrowhead 345 kV/230 kV Substation is subject to an 800 MVA limitation per a Minnesota Environmental Quality Board ("MEQB") permitting exception issued in March 2001. This limitation would need to be removed to facilitate the Project as developed by MISO.	Request that the 800 MVA issue be moved to and resolved in this docket, as discussed further below. The Applicants propose to provide notice of this issue to parties in Docket Nos. E015/AI-11-75 and E015/PA-04-2020

Each of these requests is discussed in more detail below. This request is being made at least 45 days prior to submitting an application for a Certificate of Need as required by Minn. R. 7849.0200, subp. 6.⁴

⁴ A proposed completeness checklist of the Certificate of Need requirements, reflecting this exemption request is provided at Attachment A.

IV. REQUESTED EXEMPTIONS

A. Minn. R. 7849.0240, subp. 2(B) – Need Summary and Additional Considerations

Minn. R. 7849.0240, subp. 2(B) requires that a Certificate of Need application contain “an explanation of the relationship of the proposed facility to . . . promotional activities that may have given rise to the demand for the facility.” Promotional practices are any action or policy “which directly or indirectly give rise to the demand for the facility, including but not limited to advertising, billing practices, promotion of increased use of electrical energy, and other marketing activities.”⁵ ATC does not directly serve end-users of electric service and does not engage in promotional activities that could have given rise to the need for the proposed Project. The Applicants request that the Commission grant ATC an exemption from this request. This approach is consistent with several prior exemption requests approved by the Commission in other Certificate of Need transmission line dockets.⁶

B. Minn. R. 7849.0260 C(5) – Effect of Project on Rates Systemwide

Minn. R. 7849.0260 C(5) requires that an applicant estimate a proposed project’s “effect on rates systemwide and in Minnesota, assuming a test year beginning with the proposed in-service date.” ATC requests an exemption from this requirement because it is not a Minnesota public utility whose rates are regulated by the Commission. As a transmission-only utility, ATC’s rates are regulated by the Federal Energy Regulatory Commission and the prices for providing transmission service are governed by the MISO tariff. The proposed Project, as part of the LRTP Tranche 2.1 portfolio, will have its costs allocated across the MISO footprint following MISO’s MVP cost allocation process.⁷ Information regarding the expected Project cost, the MVP allocation methodology, and the share that will be allocated to Minnesota utilities’ load would be more useful in evaluating the Project, and as such, ATC will provide its relevant data as substitute information. Minnesota Power will provide its relevant data related to the Project’s effects on its rates systemwide.

C. Minn. R. 7849.0260 A(3) and C(6) – Proposed LHVTL and Alternatives Application (Losses)

Minn. R. 7849.0260 A(3) requires the applicant to provide the expected losses “under maximum loading and under projected average loading in the length of the transmission

⁵ Minn. R. 7849.0010, subp. 24.

⁶ See, e.g., *In the Matter of Application of Xcel Energy and ITC Midwest, LLC for the Huntley-Wilmarth 345 kV Transmission Line Project*, Docket No. E002, E6675/CN-17-184, [Order on Exemption Request] (Sept. 1, 2017); *In the Matter of the Application of Prairie Rose Wind, LLC for Certificate of Need for up to 200 MW wind project in Rock and Pipestone Counties*, Docket No. IP6838/CN-10-80, ORDER APPROVING EXEMPTION PETITION (May 14, 2010); *In the Matter of the Application of Goodhue Wind for a Certificate of Need for a 78 MW Wind Project and Associated Facilities in Goodhue Cnty.*, ORDER FINDING APPLICATION COMPLETE AND INITIATING INFORMAL REVIEW PROCESS (Dec. 30, 2009).

⁷ *MISO Open Access Transmission, Energy and Operating Reserve Market Tariff, Attachment FF* Section III.A.2.g.ii.

line and at the terminals or substations.” Minn. R. 7849.0260 C(6) requires similar information (efficiency of proposed system under maximum and average loading along the length of the line). The electrical grid operates as a single, integrated system, which prevents electricity from being “directed” along a particular line or set of lines. Consequently, heat loss takes place across the entire transmission system and is not isolated to a single transmission line within the integrated regional electric grid. Therefore, losses should be calculated across the entire system rather than based on a single transmission line.

The Applicants request an exemption from Minn. R. 7849.0260 A(3) and C(6) and propose to provide system losses information in lieu of line-specific losses required by the rules. This approach is consistent with several prior exemption requests approved by the Commission in other Certificate of Need transmission line dockets.⁸

D. Minn. R. 7849.0260 D – System Map

Minn. R. 7849.0260 D requires a map showing the applicant’s system or load center to be served by the proposed Project. Because a transmission-only company such as ATC does not directly serve load, ATC proposes to submit a map showing ATC’s network of transmission lines in Minnesota and Wisconsin.

E. Minn. R. 7849.0260 B(4) – Transmission Lines with Different Terminals or Substations

Minnesota Rule 7849.0260 B(4) requires a discussion of “transmission lines with different terminals or substations.” Likewise, section B(8) of that rule requires a discussion of “any reasonable combination of the alternatives” listed in, among others, section B(4). Minn. Stat. § 216B.243, subd. 3(6), however, states that “the commission must not require evaluation of alternative end points for a high-voltage transmission line qualifying as a large energy facility unless the alternative end points are (i) consistent with end points identified in a federally registered planning authority transmission plan, or (ii) otherwise agreed to for further evaluation by the applicant.” The only end points identified in the MISO MTEP24 definition for the Project are those proposed by the Applicants, and the Applicants have not agreed to an evaluation of an alternative. Thus, the Applicants request an exemption consistent with Minn. Stat. § 216B.243, subd. 3(6).

⁸ See, e.g., *In the Matter of the Application of Minnesota Power and Great River Energy for a Certificate of Need for the Northland Reliability Project 345 kV Transmission Line*, Docket No. E015, ET2/CN-22-416, ORDER APPROVING THE REQUESTED EXEMPTIONS AND THE NOTICE PLAN (June 21, 2023); *In re Application of Minnesota Power for a Certificate of Need for the Duluth Loop Reliability Project in St. Louis Cnty.*, Docket No. E015/CN-21-140, ORDER APPROVING NOTICE PLAN AND GRANTING VARIANCES AND EXEMPTIONS (May 17, 2021).

F. Minn. R. 7849.0270, subps. 1-6 – Peak Demand and Annual Consumption Forecast and System Revenue Requirements

1. Minn. R. 7849.0270, subp. 1 – Peak Demand and Annual Consumption Data

Minn. R. 7849.0270, subp. 1 requires information concerning peak demand, and annual consumption for the applicant's entire service area and system. The Project is intended to support the reliability of the regional transmission system, particularly in northern Minnesota and northwest Wisconsin, to provide additional transmission capacity and regional transfer capacity to reliably integrate new renewable generation, meet growing electrical demand across the region, and strengthen the regional transmission grid. The Applicants propose to provide Minnesota Power's most recent AFR filed on July 1, 2025 in Docket No. E999/PR-25-11. The Commission has previously granted similar requests for other transmission projects.⁹

2. Minn. R. 7849.0270, subps. 2(A) and 2(B) – Customer Annual Consumption Data

Minn. R. 7849.0270, subps. 2(A) and 2(B) requires an applicant to estimate the number of customers and the amount of energy consumed annually by nine classes of customers (residential, commercial, industrial, farming, etc.). Energy consumption data is not relevant to establishing the need for a proposed transmission line. Transmission systems must be sized so that they have sufficient capacity to operate reliably during periods of peak demand. It is the demand for power during peak times that is the primary driver for the Project, not the amount of power consumed annually. Accordingly, it would be appropriate for the Commission to exempt the Applicants from providing this data and accept substitute data in the form of Minnesota Power's most recent AFR. The Commission has previously granted similar exemption requests for other transmission projects.¹⁰

⁹ See, e.g., *In the Matter of the Application of Minnesota Power and Great River Energy for a Certificate of Need for the Northland Reliability Project 345 kV Transmission Line*, Docket No. E015, ET2/CN-22-416, ORDER APPROVING THE REQUESTED EXEMPTIONS AND THE NOTICE PLAN (June 21, 2023); *In re Application of Minnesota Power for a Certificate of Need for the Duluth Loop Reliability Project in St. Louis Cnty.*, Docket No. E015/CN-21-140, ORDER APPROVING NOTICE PLAN AND GRANTING VARIANCES AND EXEMPTIONS (May 17, 2021); *In re Application of Great River Energy and Minnesota Power for a Certificate of Need for the Menahga Area 115 kV Transmission Line Project in Hubbard, Wadena and Becker Counties, Minnesota*, Docket No. E015/CN-14-787, ORDER APPROVING EXEMPTION REQUEST (Dec. 3, 2014).

¹⁰ See, e.g., *In the Matter of the Application of Minnesota Power and Great River Energy for a Certificate of Need for the Northland Reliability Project 345 kV Transmission Line*, Docket No. E015, ET2/CN-22-416, ORDER APPROVING THE REQUESTED EXEMPTIONS AND THE NOTICE PLAN (June 21, 2023); *In re Application of Minnesota Power for a Certificate of Need for the Duluth Loop Reliability Project in St. Louis Cnty.*, Docket No. E015/CN-21-140, ORDER APPROVING NOTICE PLAN AND GRANTING VARIANCES AND EXEMPTIONS (May 17, 2021); *In re Application of Great River Energy and Minnesota Power for a Certificate of Need for the Menahga Area 115 kV Transmission Line Project in Hubbard, Wadena and Becker Counties, Minnesota*, Docket No. E015/CN-14-787, ORDER APPROVING EXEMPTION REQUEST (Dec. 3, 2014); *In re Application of Great River Energy and Minnesota Power for a Certificate of Need for a 115 kV High Voltage Transmission Line in St. Louis and Carlton Counties*, Docket No. E015, ET2/CN-10-973, ORDER APPROVING EXEMPTIONS AND PROPOSED PROVISION OF ALTERNATIVE DATA (Nov. 2, 2010).

3. Minn. R. 7849.0270, subps. 2(C) and 2(D) – System Demand and Peak Demand

Minn. R. 7849.0270, subp. 2(C) seeks an estimate of the demand for power in the system at the time of annual system peak demand. Minn. R. 7849.0270, subp. 2(D) calls for monthly system peak demand data. Instead of the information called for in Minn. R. 7849.0270, subps. 2(C) and (D) that provides little insight into the specific transmission needs underlying the Project, the Applicants propose to provide Minnesota Power's AFR forecast information and discussion of the different regional demand scenarios evaluated in the analysis used by MISO to justify the Project.¹¹

4. Minn. R. 7849.0270, subp. 2(E) – System Revenue Requirements

Minn. R. 7849.0270, subp. 2(E) requires an estimate of the “annual revenue requirement per kilowatt-hour for the system in current dollars.” The Applicants propose to provide the general rate impact of the ISA Project on Minnesota Power's customers. The Commission has previously granted similar exemption requests for other transmission projects.¹²

5. Minn. R. 7849.0270, subp. 2(F) – Weekday Load Factor

Minn. R. 7849.0270, subp. 2(F) requires an applicant's average system weekday load factor for each month. The Applicants request an exemption from this requirement because load factor is not a relevant consideration when evaluating the need for a transmission facility. Load factor is a measure of how demand varies over time and is relevant to the need determination for new generation. Load factor has no bearing on the need for a new transmission line. Rather, transmission capacity must be designed to meet peak demand and other system power flow circumstances. This is done to ensure there is sufficient transmission capacity to meet lower levels of instantaneous demand. Thus,

¹¹ See, e.g., *In the Matter of the Application of Minnesota Power and Great River Energy for a Certificate of Need for the Northland Reliability Project 345 kV Transmission Line*, Docket No. E015, ET2/CN-22-416, ORDER APPROVING THE REQUESTED EXEMPTIONS AND THE NOTICE PLAN (June 21, 2023); *In re Application of Minnesota Power for a Certificate of Need for the Duluth Loop Reliability Project in St. Louis Cnty.*, Docket No. E015/CN-21-140, ORDER APPROVING NOTICE PLAN AND GRANTING VARIANCES AND EXEMPTIONS (May 17, 2021); *In re Application of Great River Energy and Minnesota Power for a Certificate of Need for the Menahga Area 115 kV Transmission Line Project in Hubbard, Wadena and Becker Counties, Minnesota*, Docket No. E015/CN-14-787, ORDER APPROVING EXEMPTION REQUEST (Dec. 3, 2014).

¹² See, e.g., *In the Matter of the Application of Minnesota Power and Great River Energy for a Certificate of Need for the Northland Reliability Project 345 kV Transmission Line*, Docket No. E015, ET2/CN-22-416, ORDER APPROVING THE REQUESTED EXEMPTIONS AND THE NOTICE PLAN (June 21, 2023); *In re Application of Minnesota Power for a Certificate of Need for the Duluth Loop Reliability Project in St. Louis Cnty.*, Docket No. E015/CN-21-140, ORDER APPROVING NOTICE PLAN AND GRANTING VARIANCES AND EXEMPTIONS (May 17, 2021); *In re Application of Great River Energy and Minnesota Power for a Certificate of Need for the Menahga Area 115 kV Transmission Line Project in Hubbard, Wadena and Becker Counties, Minnesota*, Docket No. E015/CN-14-787, ORDER APPROVING EXEMPTION REQUEST (Dec. 3, 2014); *In re Application of Great River Energy and Minnesota Power for a Certificate of Need for a 115 kV High Voltage Transmission Line in St. Louis and Carlton Counties*, Docket No. E015, ET2/CN-10-973, ORDER APPROVING EXEMPTION AND PROPOSED PROVISION OF ALTERNATIVE DATA (Nov. 2, 2010).

the Applicants respectfully request an exemption from this requirement. The Commission has previously granted similar exemption requests for other transmission projects.¹³

6. Minn. R. 7849.0270, subps. 3-6 – Forecast Methodology, Data Base, Assumptions, and Coordination of Forecasts

Minn. R. 7849.0270, subps. 3-6 require the applicant to detail the forecast methodology employed, identify the database used for the forecast, detail the assumptions made in preparing the forecasts provided under subpart 2 of the same rule, and a description of load forecast coordination efforts with other systems. As stated above, the need for the Project is not prompted by energy consumption, but rather by demand during peak times. Thus, instead of providing energy consumption forecasts, the Applicants believe that forecast information and discussion of the different regional demand scenarios evaluated in the analysis used by MISO to justify the Project will better enable the Commission to evaluate the need for this Project. The Applicants will provide Minnesota Power's most recent AFR. The AFR discusses forecast methodology, databases, forecast assumptions, and coordination of the forecasts with other systems. The Commission has previously granted similar exemption requests for other transmission projects.¹⁴

In sum, the Applicants request an exemption from the data requirements of Minn. R. 7849.0270, subps. 1-6 and will provide relevant AFR forecast information and discussion of the different regional demand scenarios evaluated in the analysis used by MISO in analyzing the need for the Project. This substitute information is better tailored to the need for the ISA Project and will assist the Commission in evaluating the Project.

G. Minn. R. 7849.0280 – System Capacity

Minn. R. 7849.0280 pertains to system capacity and generation data. The general purpose of this section is to provide a discussion of the ability of the existing system to meet the forecasted demand for electrical energy in response to Minn. R. 7849.0270.

¹³ See, e.g., *In the Matter of the Application of Minnesota Power and Great River Energy for a Certificate of Need for the Northland Reliability Project 345 kV Transmission Line*, Docket No. E015, ET2/CN-22-416, ORDER APPROVING THE REQUESTED EXEMPTIONS AND THE NOTICE PLAN (June 21, 2023); *In re Application of Minnesota Power for a Certificate of Need for the Duluth Loop Reliability Project in St. Louis Cnty.*, Docket No. E015/CN-21-140, ORDER APPROVING NOTICE PLAN AND GRANTING VARIANCES AND EXEMPTIONS (May 17, 2021); *In re Application of Great River Energy and Minnesota Power for a Certificate of Need for the Menahga Area 115 kV Transmission Line Project in Hubbard, Wadena and Becker Counties, Minnesota*, Docket No. E015/CN-14-787, ORDER APPROVING EXEMPTION REQUEST (Dec. 3, 2014); *In re Application of Great River Energy and Minnesota Power for a Certificate of Need for a 115 kV High Voltage Transmission Line in St. Louis and Carlton Counties*, Docket No. E015, ET2/CN-10-973, ORDER APPROVING EXEMPTIONS AND PROPOSED PROVISION OF ALTERNATIVE DATA (Nov. 2, 2010).

¹⁴ See, e.g., *In the Matter of the Application of Minnesota Power and Great River Energy for a Certificate of Need for the Northland Reliability Project 345 kV Transmission Line*, Docket No. E015, ET2/CN-22-416, ORDER APPROVING THE REQUESTED EXEMPTIONS AND THE NOTICE PLAN (June 21, 2023); *In re Application of Minnesota Power for a Certificate of Need for the Duluth Loop Reliability Project in St. Louis Cnty.*, Docket No. E015/CN-21-140, ORDER APPROVING NOTICE PLAN AND GRANTING VARIANCES AND EXEMPTIONS (May 17, 2021); *In re Application of Great River Energy and Minnesota Power for a Certificate of Need for the Menahga Area 115 kV Transmission Line Project in Hubbard, Wadena and Becker Counties, Minnesota*, Docket No. E015/CN-14-787, ORDER APPROVING EXEMPTION REQUEST (Dec. 3, 2014).

Subparts (A) through (I) pertain to an examination of generation adequacy and do not address transmission planning considerations. The Applicants therefore request that the Commission grant an exemption from Minn. R. 7849.0280, subps. (A) through (I). The Commission has previously granted exemption requests from part of Minn. R. 7849.0280 in several other transmission line Certificate of Need dockets where issues of transmission adequacy, rather than generation adequacy, were at issue.¹⁵

H. Minn. R. 7849.0290 – Conservation

a. Minnesota Power

The Applicants request an exemption from Minn. R. 7849.0290, which relates to conservation programs the Applicants have in place and their effect on the forecast information called for in Minn. R. 7849.0270. This rule is intended to ensure that regulated load serving utilities fully consider conservation as well as generation when planning for future needs of their customers.¹⁶ Minnesota Power's conservation and efficiency information is examined in detail in its resource planning process. All of the information requested by Minn. R. 7849.0290 is contained, as applicable, in the Integrated Resource Plan and Conservation Improvement Plan ("CIP") filings filed by Minnesota Power with the Commission. Instead of replicating that information in this application, Minnesota Power proposes to present a summary of these filings. This will allow interested parties to pursue their investigation into this issue further through those materials if they wish. The Applicants will also provide information regarding how conservation and energy efficiency was considered by MISO in its evaluation of the Project. This request is consistent with prior exemptions the Commission has granted in other dockets.¹⁷

b. ATC

ATC requests a full exemption from Minn. R. 7849.0290. This rule is intended to ensure that regulated load serving utilities fully consider conservation as well as generation when

¹⁵ See, e.g., *In re Application of Minnesota Power for a Certificate of Need for the Duluth Loop Reliability Project in St. Louis Cnty.*, Docket No. E015/CN-21-140, ORDER APPROVING NOTICE PLAN AND GRANTING VARIANCES AND EXEMPTIONS (May 17, 2021); *In re Application of Great River Energy and Minnesota Power for a Certificate of Need for the Menahga Area 115 kV Transmission Line Project in Hubbard, Wadena and Becker Counties, Minnesota*, Docket No. E015/CN-14-787, ORDER APPROVING EXEMPTION REQUEST (Dec. 3, 2014); *In re Application of Great River Energy and Minnesota Power for a Certificate of Need for a 115 kV High Voltage Transmission Line in St. Louis and Carlton Counties*, Docket No. E015, ET2/CN-10-973, ORDER APPROVING EXEMPTIONS AND PROPOSED PROVISION OF ALTERNATIVE DATA (Nov. 2, 2010).

¹⁶ *In re Application of Rapids Power LLC for a Certificate of Need for its Grand Rapids Cogeneration Project*, Docket No. IP-4/CN-01-1306, ORDER GRANTING EXEMPTIONS FROM FILING REQUIREMENTS at 6 (Oct. 9, 2001).

¹⁷ See, e.g., *In re Request of Minnesota Power for a Certificate of Need for the Great Northern Transmission Line*, Docket No. E015/CN-12-1163, ORDER APPROVING NOTICE PLAN, GRANTING VARIANCE REQUEST, AND APPROVING EXEMPTION REQUEST (Feb. 28, 2013); *In re Application of Northern States Power Company d/b/a Xcel Energy and Great River Energy for a Certificate of Need for the Upgrade of the Southwest Twin Cities (SWTC) Chaska Area 69 kV Transmission Line to 115 kV Capacity*, Docket No. E022/CN-11-826, ORDER GRANTING THE COMPANY'S EXEMPTION REQUEST (Nov. 4, 2011).

planning for future needs of their customers.¹⁸ ATC does not have end-use customers and, therefore, cannot affect customers' energy consumption levels. This request is consistent with prior exemptions the Commission has granted in other dockets.¹⁹

I. Minn. R. 7849.0300 – Consequences of Delay and Minn. R. 7849.0340 – No Facility Alternative

Minn. R. 7849.0300 requires detailed information regarding the consequences of delay on three specific statistically-based levels of demand and energy consumption. Similarly, Minn. R. 7849.0340 requires a discussion of the impact on existing generation and transmission facilities at the three levels of demand specified in Minn. R. 7849.0300 for the no-build alternatives. While the Applicants will discuss the consequences of delay and a no build alternative in its application, there is no need to discuss these items in terms of three levels of demand. Rather, as noted above, for transmission planning purposes, the relevant inquiry is whether the system can meet peak demand. The Commission has approved similar partial exemption requests from the requirements of Minn. R. 7849.0300 and 7849.0340 in other transmission line Certificate of Need dockets.²⁰

J. MEQB 800 MVA Limit

In its March 2001 order, the MEQB granted a permitting exemption to Minnesota Power for the construction of the Arrowhead – Weston 345 kV transmission line and the ATC Arrowhead 345 kV/230 kV Substation.²¹ The MEQB included a condition that the ATC Arrowhead 345 kV/230 kV Substation could not be used to “transmit power . . . beyond 800 MVA.”²² While the permitting exemption was in the name of Minnesota Power when it was issued in 2001, the permissions and conditions were transferred to ATC in 2005 in

¹⁸ See, e.g., *In the Matter of the Application of Rapids Power LLC for a Certificate of Need for its Grand Rapids Cogeneration Project*, Docket No. IP4/CN-01-1306, ORDER GRANTING EXEMPTIONS FROM FILING REQUIREMENTS, at 6 (Oct. 9, 2001).

¹⁹ See, e.g., *In the Matter of Application of Xcel Energy and ITC Midwest, LLC for the Huntley-Wilmarth 345 kV Transmission Line Project*, Docket No. E002, E6675/CN-17-184, [Order on Exemption Request] (Sept. 1, 2017); *In the Matter of Application of ITC Midwest LLC for a Certificate of Need for the Minnesota-Iowa 345 kV Transmission Line Project in Jackson, Martin, and Faribault Cnties., Minnesota*, Docket No. ET6675/CN-12-1053, ORDER ON EXEMPTION REQUEST (Feb. 8, 2013).

²⁰ See, e.g., *In re Application of Minnesota Power for a Certificate of Need for the Duluth Loop Reliability Project in St. Louis Cnty.*, Docket No. E015/CN-21-140, ORDER APPROVING NOTICE PLAN AND GRANTING VARIANCES AND EXEMPTIONS (May 17, 2021); *In re Application of Great River Energy and Minnesota Power for a Certificate of Need for the Menahga Area 115 kV Transmission Line Project in Hubbard, Wadena and Becker Counties, Minnesota*, Docket No. E015/CN-14-787, ORDER APPROVING EXEMPTION REQUEST (Dec. 3, 2014); *In re Request of Minnesota Power for a Certificate of Need for the Great Northern Transmission Line*, Docket No. E015/CN-12-1163, ORDER APPROVING NOTICE PLAN, GRANTING VARIANCE REQUESTION AND APPROVING EXEMPTION REQUEST (Feb. 28, 2013); *In the Matter of the Application of Northern States Power Company d/b/a Xcel Energy and Great River Energy for a Certificate of Need for the Upgrade of the Southwest Twin Cities (SWTC) Chaska Area 69 kV Transmission Line to 115 kV Capacity* Docket No. E002/CN-11-826, ORDER GRANTING THE COMPANY'S EXEMPTION REQUEST (Nov. 4, 2011).

²¹ See *In the Matter of the Exemption Application by Minnesota Power for a 345/230 kV High Voltage Transmission Line Known as the Arrowhead Project*, MEQB Docket No. MP-HVTL-EA-1-99, Order at 8-9 (2001).

²² *Id.*

Docket No. E015/PA-04-2020.²³ The Commission approved the transfer under the condition that “Minnesota Power shall file for Commission review all subsequent agreements between itself and ATC that affect the Arrowhead Project in any way.”²⁴

The ISA Project will change the configuration of the transmission system such that power flow through the ATC Arrowhead 345/230 kV Substation into Wisconsin will, at times, exceed 800 MVA. Therefore, the Applicants will need to request that the Commission remove the MEQB 800 MVA limit on power flow through the ATC Arrowhead 345/230 kV Substation. Because the information the Commission needs to evaluate the removal of the 800 MVA limit as a result of the Project will be provided with the Certificate of Need Application, the Applicants request that the 800 MVA issue be moved to and resolved in this docket, Docket No. E015/CN-25-111. The Applicants also recommend providing notice of the request to remove the 800 MVA issue via filing summary not only to the persons required under Minn. R. 7849 but also to the parties in Docket Nos. E015/AI-11-75 and E015/PA-04-2020.

V. CONCLUSION

The Applicants respectfully request that the Commission grant the requested exemptions to allow the Applicants to provide information in its application that is relevant and appropriate to determining the need for the ISA Project without imposing unnecessary filing burdens, and to efficiently address the 800 MVA limit in this docket.

²³ See *In the Matter of Minnesota Power's Petition for Review of an Agreement Between Minnesota Power and American Transmission Company*, Docket No. E015/M-04-2020, Order (Dec. 2, 2005).

²⁴ *In the Matter of Minnesota Power's Petition for Review of an Agreement Between Minnesota Power and American Transmission Company*, Docket No. E015/M-04-2020, Order at 9 (Dec. 2, 2005).

August 7, 2025

Respectfully submitted,

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IRON RANGE – ST. LOUIS COUNTY – ARROWHEAD 345 kV TRANSMISSION PROJECT
CERTIFICATE OF NEED APPLICATION
COMPLETENESS CHECKLIST

Authority	Required Information	Location in Application
Minn. R. 7829.2500, subp. 2	Brief summary of filing on separate page sufficient to apprise potentially interested parties of its nature and general content	
Minn. R. 7849.0200, subp. 2	Title Page and Table of Contents	
Minn. R. 7849.0200, subp. 4	Cover Letter	
Minn. R. 7849.0220, subp. 3	Joint Ownership and Multiparty use	
Minn. R. 7849.0240	Need summary and additional considerations	
Subp. 1	Summary of the major factors that justify the need for the proposed facility	
Subp. 2	Relationship of the proposed facility to the following socioeconomic considerations:	
A.	Socially beneficial uses of the output of the facility	
B.	Promotional activities that may have given rise to the demand for the facility	EXEMPT as to ATC
C.	Effects of the facility in inducing future development	
Minn. R. 7849.0260	Proposed LHVTL and Alternatives	
A.	A description of the type and general location of the proposed line, including:	
(1)	Design voltage	
(2)	Number, sizes and types of conductors	

Authority	Required Information	Location in Application
(3)	Expected losses under projected maximum loading and under projected average loading in the length of the line and at terminals or substations	EXEMPT provided alternative data is supplied
	ALTERNATIVE DATA – Estimated overall system losses	
(4)	Approximate length of the proposed line	
(5)	Approximate locations of DC terminals or AC substations on a map	
(6)	List of likely affected counties	
B.	Discussion of the available alternatives including:	
(1)	New generation	
(2)	Upgrading existing transmission lines	
(3)	Transmission lines with different voltages or conductor arrays	
(4)	Transmission lines with different terminals or substations	EXEMPT
(5)	Double circuiting of existing transmission lines	
(6)	If facility for DC (AC) transmission, an AC (DC) transmission line	
(7)	If proposed facility is for overhead (underground) transmission, an underground (overhead) transmission line	
(8)	Any reasonable combination of alternatives (1) – (7)	EXEMPT
C.	For the facility and each for alternative in B, a discussion of:	
(1)	Total cost in current dollars	
(2)	Service life	
(3)	Estimated average annual availability	

Authority	Required Information	Location in Application
(4)	Estimated annual O&M costs in current dollars	
(5)	Estimate of its effect on rates system wide in Minnesota	EXEMPT as to ATC, provided alternative data is supplied
	ALTERNATIVE DATA (ATC) – Information regarding Project cost, MVP allocation methodology, and share allocated to Minnesota utilities.	
(6)	Efficiency expressed for a transmission facility as the estimated losses under projected maximum loading and under projected average loading in the length of the transmission line and at the terminals or substations	
(7)	Major assumptions made in subitems (1) – (6)	
D.	A map (of appropriate scale) showing the applicant's system or load center to be served by the proposed LHVTL	EXEMPT as to ATC, provided alternative map is supplied
	ALTERNATIVE DATA (ATC) – Map of ATC's network of transmission lines in Minnesota and Wisconsin.	
E.	Such other information about the proposed facility and each alternative as may be relevant to determination of need.	
Minn. R. 7849.0270	Content of Forecast	
Minn. R. 7849.0270, subp. 1	Peak demand and annual consumption data within the applicant's service area and system.	EXEMPT provided alternative data is supplied
	ALTERNATIVE DATA – Minnesota Power's most recent Annual Electric Utility Forecast Report	
Minn. R. 7849.0270, subp. 2	Minnesota forecast data; forecast demand data by customer class, peak period, and month; estimated system annual revenue per kilowatt hour; estimated average weekday system load factor by month.	EXEMPT except as noted below and provided alternative data is supplied

Authority	Required Information	Location in Application
	ALTERNATIVE DATA – Minnesota Power’s most recent Annual Electric Utility Forecast Report	
	Subp. 2(E) – Alternative explanation of how wholesale electricity costs are spread and general financial effect on Minnesota Power’s customers.	
Minn. R. 7849.0270, subp. 3	Detail of the forecast methodology used in subp. 2	EXEMPT provided alternative data is supplied
Minn. R. 7849.2070, subp. 4	Discussion of database used in current forecasting.	EXEMPT provided alternative data is supplied
Minn. R. 7849.0270, subp. 5	Discussion of each essential assumption made in forecast preparation and sensitivity to variations in assumptions.	EXEMPT provided alternative data is supplied
Minn. R. 7849.0270, subp. 6	Coordination of forecasts.	EXEMPT provided alternative data is supplied
	ALTERNATIVE DATA FOR SUBPS. 3-6 – Minnesota Power’s most recent Annual Electric Utility Forecast Report and any forecast information used in analyzing the need for the Project.	
Minn. R. 7849.0280	System Capacity	
	Description of ability of existing system to meet demand forecast including:	
A.	Power planning programs	EXEMPT
B.	Seasonal firm purchases and sales	EXEMPT
C.	Seasonal participation purchases and sales	EXEMPT
D.	Load and generation capacity data request in subitems 1-13 for summer and winter seasons for each forecast year, including anticipated purchases, sales, and capacity retirements and additions except those that depend on a not yet issued certificate of need.	EXEMPT

Authority	Required Information	Location in Application
E.	Summer and winter season load generation and capacity in years subsequent to application contingent on proposed facility	EXEMPT
F.	Summer and winter season load generation and capacity including all projected purchases, sales and generation in years subsequent to application	EXEMPT
G.	List of proposed additions and retirements in generating capacity for each forecast year subsequent to application	EXEMPT
H.	Graph of monthly adjusted net demand and capability with difference between capability and maintenance outages plotted	EXEMPT
I.	Appropriateness and method of determining system reserve margins	EXEMPT
Minn. R. 7849.0290	Conservation Programs	
A.	Persons responsible for energy conservation and efficiency programs	EXEMPT as to ATC EXEMPT as to Minnesota Power, provided alternative data is supplied
B.	List of energy conservation and efficiency goals and objectives	EXEMPT as to ATC EXEMPT as to Minnesota Power, provided alternative data is supplied
C.	Description of programs considered, implemented and rejected	EXEMPT as to ATC EXEMPT as to Minnesota Power, provided alternative data is supplied

Authority	Required Information	Location in Application
D.	Description of major accomplishments in conservation and efficiency	EXEMPT as to ATC EXEMPT as to Minnesota Power, provided alternative data is supplied
E.	Description of future plans with respect to conservation and efficiency	EXEMPT as to ATC EXEMPT as to Minnesota Power, provided alternative data is supplied
F.	Quantification of the manner by which these programs impact the forecast	EXEMPT as to ATC EXEMPT as to Minnesota Power, provided alternative data is supplied
	ALTERNATIVE DATA FOR A-F – Minnesota Power will provide a summary of its most recent Integrated Resource Plan and Conservation Improvement Program filings.	
Minn. R. 7849.0300	Consequence of Delay	EXEMPT from three levels of demand
Minn. R. 7849.0310	Required Environmental Information	
Minn. R. 7849.0330	Transmission Facilities	
	Data for each alternative that would require LHVTL construction including:	
A.	For overhead transmission lines	
(1)	Schematics showing dimensions of support structures	
(2)	Discussion of electric fields	
(3)	Discussion of ozone and nitrogen oxide emissions	
(4)	Discussion of radio and television interference	

Authority	Required Information	Location in Application
(5)	Discussion of audible noise	
B.	For underground transmission facilities:	N/A
(1)	Types and dimensions of cable systems	N/A
(2)	Types and qualities of cable system materials	N/A
(3)	Heat released in kW per foot of cable	N/A
C.	Estimated right-of-way required for the facility	
D.	Description of construction practices	
E.	Description of O&M practices	
F.	Estimated workforce required for construction and O&M	
G.	Description of region between endpoints in likely area for routes emphasizing a three mile radius of endpoints including:	
(1)	Hydrological features	
(2)	Vegetation and wildfire	
(3)	Physiographic regions	
(4)	Land use types	
Minn. R. 7849.0340	No-Facility Alternative	EXEMPT from three levels of demand

*IN THE MATTER OF THE APPLICATION FOR A
CERTIFICATE OF NEED FOR THE IRON RANGE –
ST. LOUIS COUNTY – ARROWHEAD 345 kV
TRANSMISSION LINE PROJECT.*

Docket No. E015/CN-25-111

CERTIFICATE OF SERVICE

Gustav Gerhardson certifies that on the 7th day of August, 2025, on behalf of Minnesota Power and American Transmission Company LLC by and through its corporate manager ATC Management Inc., he efiled a true and correct copy of the **Request for Exemptions for Certain Certificate of Need Application Content Requirements** by posting the same on [eDockets](#). Said filing is also served as designated on the attached Service List on file with the Minnesota Public Utilities Commission in the above-referenced docket number.

/s/ Gustav Gerhardson
Gustav Gerhardson

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