

VIA ELECTRONIC MAIL AND EFS

October 2, 2023

Minnesota Department of Commerce
Energy Environmental Review and Analysis Unit
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Minnesota Public Utilities Commission
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Re: *In Re Application of Minnesota Power for a Certificate of Need for the HVDC Modernization Project in Hermantown, Saint Louis County, Docket No. E015/CN-22-607*

In Re Application of Minnesota Power for a Route Permit for a High Voltage Transmission Line for the HVDC Modernization Project in Hermantown, Saint Louis County, Docket No. E-015/TL-22-611

ATC Reply to Minnesota Power's Response to Route Alternative and Conditions Proposed to be Evaluated in the Environmental Assessment

Dear Ms. Ness and Mr. Seuffert:

On behalf of American Transmission Company LLC, by and through its corporate manager, ATC Management Inc. (collectively, "ATC"), I am writing to submit a brief reply to Minnesota Power's ("MP" or "Applicant") September 29, 2023 response ("Response")¹ to the "Arrowhead Alternative" that ATC proposed in its September 15, 2023 Scoping Comments on the Environmental Assessment ("EA") for the above-captioned proceedings.

¹ See Minnesota Power, *Minnesota Power's Response to Route Alternative and Conditions Proposed to be Evaluated in the Environmental Assessment* (Sept. 29, 2023) (Document ID 20239-199286-01), available at <https://tinyurl.com/4tr8j27>.

In its Response, the Applicant requests that ATC's proposed Arrowhead Alternative not be evaluated in the EA for a variety of reasons. ATC strongly disagrees with virtually all of the Applicant's assertions concerning the feasibility, cost, and impacts of the proposed Arrowhead Alternative, including the Applicant's assertion that this alternative would not achieve the same purpose as the Applicant's proposed High Voltage Direct Current ("HVDC") Modernization Project. ATC is not, as the Applicant suggests, proposing to materially change the HVDC Modernization Project in a manner that would undermine its fundamental purpose—namely, modernizing the HVDC converter stations on either end of the Applicant's 250-kV Square Butte HVDC transmission line. Rather, the Arrowhead Alternative simply provides a more cost effective and less impactful means of interconnecting this transmission line and its associated upgraded converter station in Minnesota to the alternating current bulk electric transmission system: through ATC's existing 345/230-kV Arrowhead Substation, rather than through the new St. Louis County Substation the Applicant is proposing to construct less than a half-mile away.

ATC understands that the EA scoping public comment period has closed and that the Minnesota Department of Commerce ("DOC") is preparing to make a decision on the scope of the EA soon. Accordingly, while ATC strongly disagrees with the Applicant's assertions concerning the viability and impacts of the Arrowhead Alternative, ATC is not at this time submitting a detailed response to each issue the Applicant raised.² If anything, the issues the Applicant noted in its Response demonstrate that ATC's proposed Arrowhead Alternative merits additional review and consideration as part of the EA that will be prepared in these proceedings.

Therefore, ATC respectfully requests that the EA study and consider the proposed Arrowhead Alternative in detail. ATC remains willing and able to provide the DOC and the Commission with additional details and information concerning the Arrowhead Alternative as the EA is being prepared and these proceedings progress.

/s/ David R. Zoppo

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² ATC reserves the right to address the issues that the Applicant raised in its Response later in this proceeding.

CERTIFICATE OF SERVICE

I, David R. Zoppo, hereby certify that I have this day served a true and correct copy of the following document(s) by electronic filing, electronic mail, courier, interoffice mail, or by depositing the same enveloped with postage paid in the United States to all persons at the addresses indicated below or on the attached Service List on file with the Minnesota Public Utilities Commission in the below referenced dockets.

**ATC REPLY TO MINNESOTA POWER’S RESPONSE TO ROUTE ALTERNATIVE
AND CONDITIONS PROPOSED TO BE EVALUATED IN THE ENVIRONMENTAL
ASSESSMENT**

In the Matter of the Application of Minnesota
Power for a Certificate of Need for the HVDC
Modernization Project in Hermantown, Saint
Louis County
MPUC Docket No. E-015/CN-22-607

In the Matter of the Application of Minnesota
Power for a Certificate of Need for the HVDC
Modernization Project in Hermantown, Saint
Louis County
MPUC Docket No. E-015/CN-22-607

Dated this 2nd day of October, 2023

/s/ David R. Zoppo
David R. Zoppo

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