



30 West Superior Street, Duluth, MN 55802  
218.864.6059 | [www.mnpower.com](http://www.mnpower.com)

P.O. Box 47, Waukesha, WI 53187-0047  
866.899.3204

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: Notice Plan Petition**

*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 Notice Plan for approval by the Minnesota Public Utilities Commission (“Commission”) pursuant to Minnesota Rule 7829.2550. In accordance with Minnesota Rule 7829.2550, subp. 1, copies of this Notice Plan have been provided to the Minnesota Department of Commerce, the Minnesota Office of Attorney General-Residential Utilities and Antitrust Division, and to persons listed on the “General List of Persons Interested in Power Plants and Transmission Lines” as maintained by the Commission under Minnesota Rule 7850.2100, subp. 1(A).

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

**NOTICE PLAN PETITION**

---

**Public Comments on this Notice Plan Petition can be submitted to the  
Minnesota Public Utilities Commission until 4:30 p.m. on August 27, 2025**

**Replies to Comments can be submitted to the Minnesota Public Utilities  
Commission until 4:30 p.m. on September 16, 2025**

**The Minnesota Public Utilities Commission's address is: Minnesota Public  
Utilities Commission, 121 7<sup>th</sup> Place East, Suite 350, St. Paul, MN 55101-2147**

---

## I. INTRODUCTION

ALLETE, Inc. d/b/a Minnesota Power (“Minnesota Power”) and American Transmission Company LLC by and through its corporate manager ATC Management Inc. (“ATC”) (collectively, the “Applicants”) submit this Notice Plan for approval by the Commission pursuant to Minn. R. 7829.2550. This Notice Plan is intended to provide notice to all persons reasonably likely to be affected by the Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project (“ISA Project” or “Project”). The Applicants intend to submit a combined application for a Certificate of Need and a Route Permit to construct and maintain the ISA Project pursuant to Minn. Stat. §§ 216B.243 and 216I.05 in the fourth quarter of 2025.

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

A Certificate of Need is required under Minn. Stat. § 216B.243 before a high voltage transmission line of the voltages and lengths proposed for the Project is constructed. Minn. R. 7829.2550 requires a Notice Plan to be submitted for review by the Commission at least three months before filing a Certificate of Need application. Applicants intend to submit a combined application for a Certificate of Need and a Route Permit for the Project in the fourth quarter of 2025. Applicants, therefore, submit this Notice Plan for the Commission’s approval.

## I. NOTICE PLAN PROPOSAL

This Notice Plan is prepared as an initial step in the Certificate of Need regulatory process. Preparation of a Notice Plan, and its review and approval by the Commission, will ensure that interested persons are aware of the proceeding and have the opportunity to participate. The area proposed to be included in notices under this Plan (“Notice Area”) is depicted in **Attachment A, Figure 1**.

The Notice Area is generally 1.5 miles wide centered on existing high voltage transmission lines. The Notice Area expands up to 2.25 miles wide in some areas to provide routing flexibility. The Notice Area is located within St. Louis and Itasca counties.

While the Notice Plan is the first step in the regulatory process, Applicants have already begun gathering stakeholder, agency, Tribal, and public input on possible route alternatives. This outreach has included public open houses, stakeholder workshops, individual stakeholder outreach, and creation of a Project website that includes Project information, ways to provide input, and interactive, detailed maps. The Project website can be viewed at: <https://isatransmissionproject.com/>. With this proposed Notice Plan, the Applicants will continue this public outreach and provide the notices listed below in compliance with Minn. R. 7829.2550.

#### **A. Direct Mail Notice**

**Attachment A** includes a letter that will be mailed to landowners, residents, local units of government, elected officials, tribal government contacts, and agencies within the Notice Area.

##### **1. Landowners**

Minn. R. 7829.2550, subp. 3(A), requires an applicant for a Certificate of Need to provide direct mail notice to all landowners reasonably likely to be affected by the proposed transmission line. Applicants propose to provide direct mail notice to all landowners who own property within the Notice Area. Applicants have obtained tax landowner names and addresses within the Notice Area using geographic information system ("GIS") county parcel records from St. Louis and Itasca Counties.

##### **2. Mailing Addresses**

Minn. R. 7829.2550, subp. 3(B), requires an applicant for a Certificate of Need to provide direct mail notice to all mailing addresses in the area that are reasonably likely to be affected by the proposed transmission line. Applicants propose to provide direct mail notice to all residential and commercial mailing addresses within the Notice Area. Applicants have obtained a list of mailing addresses in the Notice Area from St. Louis and Itasca Counties.

##### **3. Tribal Government Officials**

Minn. R. 7829.2550, subp. 3(C), requires an applicant for a Certificate of Need for a high voltage transmission line to provide direct mail notice to Tribal governments whose jurisdictions are reasonably likely to be affected by the proposed transmission line. Applicants will provide direct mail notice to each of the 11 federally recognized Tribal Nations in Minnesota, as well as the Minnesota Indian Affairs Counsel, as listed in

**Attachment B-1.** Applicants will provide direct mail notice to the Tribal Nations and other Tribal government officials and administrators listed in **Attachment B-1**.

#### 4. Local Governments

Minn. R. 7829.2550, subp. 3(C), requires an applicant to provide direct mail notice to governments of towns, statutory cities, home rule charter cities, and counties whose jurisdictions are reasonably likely to be affected by the proposed transmission line. Applicants propose to provide direct mail notice to lead administration personnel in the towns, cities, and counties. Applicants will also provide notice to the elected officials of those local units of government and to those state senators and state representatives whose districts are within the Notice Area. A complete list of these government recipients is included in **Attachment B-2**.

#### **B. Newspaper Notice.**

Minn. R. 7829.2550, subp. 3(D), requires an applicant to publish public notice in newspapers of local, regional, and statewide circulation. Specifically, Applicants propose to place notice advertisements in the following newspapers:

**Table 1. Newspaper Notice**

<b>Name of Newspaper</b>	<b>County of Circulation</b>
Star Tribune	Statewide
Duluth News Tribune	St. Louis County
The Proctor Journal	St. Louis County
Grand Rapids Herald-Review	Itasca County

In addition to the Notice Plan newspaper notice requirement, Minn. R. 7829.2500, subp. 5 requires that after a Certificate of Need application is filed that an applicant publish a newspaper notice of the filing in a newspaper of general circulation throughout the state. Given that under the proposed Notice Plan, the Applicants will publish a newspaper notice of the Certificate of Need proceeding shortly before a Certificate of Need application is filed in the newspapers of local, regional, and statewide circulation, the Applicants request a variance of Minn. Rule 7829.2500, subp. 5, to remove this additional newspaper notice requirement.

The three requirements for a rule variance under Minn. R. 7829.3200, subp. 1 are: (1) enforcement of the rule would impose an excessive burden upon the applicant or others affected by the rule; (2) granting the variance would not adversely affect the public interest; and (3) granting the variance would not conflict with standards imposed by law. These three requirements are met here.

The requirement under Minn. R. 7829.2500, subp. 5 would be an excessive burden as it requires duplicate notice (and associated expense) without a corresponding benefit. The public will receive notice of the Project and ways to participate in the regulatory proceedings via the pre-application filing in the Minnesota Star Tribune and other papers

of local and regional circulation. Therefore, the public interest would not be adversely affected by the requested variance. Finally, the Commission has previously granted such a variance<sup>1</sup> and there is no conflict with any standards imposed by law. Applicants respectfully request the Commission grant this variance.

### **C. Notice Content**

Minn. R. 7829.2550, subp. 4 sets forth the information that must be incorporated into the notice letter including: a map showing the end points of the line and existing transmission facilities in the area; right-of-way requirements for the proposed line and a statement of intent to acquire property rights for the right-of-way; notice that the transmission upgrade cannot be constructed unless the Commission certifies that it is needed; Commission contact information; utility website information that includes its biennial transmission projects report; a statement that an environmental report will be prepared; an explanation of how to get on the Project's mailing list; and a list of applicable regulatory laws and rules that govern the request for Project approval. Applicants' proposed notice mailing meets these requirements.

The map (**Attachment A, Figure 1**) that will be included with the notice letter will depict the entire Project notice area including end points, existing transmission lines and substations, counties, townships, and notable landmarks to aid in orientation. The map that will be sent with the notice letter will be updated from the enclosed **Attachment A, Figure 1** to show the routes the Applicants are likely to propose in its Route Permit application. The Applicants will provide a copy of this updated map to Commission staff for review prior to mailing.

### **D. Distribution of Notice Plan Filing**

As required under Minn. R. 7829.2550, subp. 1, this Notice Plan filing has been sent to the Department, the Office of the Attorney General – Residential Utilities Division, and to those parties listed on the “General List of Persons Interested in Power Plants and Transmission Lines” as maintained in eDockets.

### **E. Notice Timing**

Minn. R. 7829. 2550, subp. 6, requires the applicant to implement the Notice Plan within 30 days of its approval by the Commission. Applicants request that the Commission vary the Notice Plan implementation rule requirement to allow notice to more closely coincide with the filing of the Certificate of Need application. Therefore, Applicants request that the Commission grant a variance and direct the notices identified in this Notice Plan to occur not more than 90 days and no less than two weeks prior to the filing of the Certificate of Need application.

---

<sup>1</sup> *In the Matter of the Application of Xcel Energy for a Certificate of Need for Two Gen-Tie Lines from Sherburne County to Lyon County, Minnesota*, Docket No. E002/CN-22-131, ORDER APPROVING THE NOTICE PLAN PETITION AND EXEMPTION REQUEST at 1 and 6 (June 28, 2022).

The three requirements for a rule variance under Minn. R. 7829.3200, subp. 1 are met here. The notice requirements outlined in the rule would burden all parties by separating notice provided to interested stakeholders from the start of the proceeding. Further, granting a variance would neither adversely affect the public interest nor conflict with standards imposed by law. The Commission has previously requested a similar variance in other Certificate of Need dockets.<sup>2</sup>

#### F. Project Service List

Pursuant to Minn. R. 7829.0700, subp. 1, the Applicants request that the following persons be placed on the Commission's Office Service List for this matter, and requests electronic service for these persons:

Jackson J. Evans Minnesota Power 30 West Superior Street Duluth, MN 55802 <a href="mailto:jjevans@allete.com">jjevans@allete.com</a>	John Sagone American Transmission Company W234 N2000 Ridgeview Pkwy Ct. Waukesha, WI 53188 <a href="mailto:jsagone@atcllc.com">jsagone@atcllc.com</a>
Zach Golkowski Minnesota Power 30 West Superior Street Duluth, MN 55802 <a href="mailto:zgolkowski@mnpower.com">zgolkowski@mnpower.com</a>	Eric F. Swanson Winthrop & Weinstine, P.A. 225 South 6th Street Suite 3500 Minneapolis, MN 55105 <a href="mailto:eswanson@winthrop.com">eswanson@winthrop.com</a>
Kodi Jean Verhalen Taft Stettinius & Hollister LLP 2200 IDS Center 80 South 8 <sup>th</sup> Street Minneapolis, MN 55402-2157 <a href="mailto:kverhalen@taftlaw.com">kverhalen@taftlaw.com</a>	Elizabeth H. Schmiesing Winthrop & Weinstine, P.A. 225 South 6th Street Suite 3500 Minneapolis, MN 55105 <a href="mailto:eschmiesing@winthrop.com">eschmiesing@winthrop.com</a>
Valerie T. Herring Taft Stettinius & Hollister LLP 2200 IDS Center 80 South 8 <sup>th</sup> Street Minneapolis, MN 55402-2157 <a href="mailto:vherring@taftlaw.com">vherring@taftlaw.com</a>	Christopher J. Cerny Winthrop & Weinstine, P.A. 225 South 6th Street Suite 3500 Minneapolis, MN 55105 <a href="mailto:ccerny@winthrop.com">ccerny@winthrop.com</a>

<sup>2</sup> *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 at 3, 6 (May 17, 2021); *In the Matter of the Application of Byron Solar Project, LLC for a Certificate of Need for the up to 200 MW Byron Solar Project and 345 kV Transmission Line in Olmstead and Dodge Counties, Minnesota*, Docket No. IP-7041/CN-20-764, ORDER APPROVING NOTICE PLAN, APPROVING EXEMPTION REQUESTS, AND GRANTING VARIANCES (Jan. 15, 2021).

## II. CONCLUSION

Applicants respectfully request that the Commission (1) approve this Notice Plan prepared in advance of the filing of a Certificate of Need application to construct the Project; (2) grant a variance from duplicative newspaper notice requirements under Minn. R. 7829.2500, subp. 5; and (3) grant the variance from the 30-day implementation notice in Minn. R. 7829.2550, subp. 6, and modify the time for implementation of the Notice Plan to no more than 90 days and no less than two weeks prior to the filing of the Certificate of Need Application.

August 7, 2025

Respectfully submitted,

### **MINNESOTA POWER**

/s/ Jackson J. Evans

Jackson J. Evans  
FERC Counsel  
30 West Superior Street  
Duluth, MN 55802  
[jjevans@allete.com](mailto:jjevans@allete.com)  
(218) 723 3963

Kodi Jean Verhalen  
Valerie T. Herring  
Taft Stettinius & Hollister LLP  
2200 IDS Center  
80 South 8<sup>th</sup> Street  
Minneapolis, MN 55402-2157  
(612) 977-8400  
[kverhalen@taftlaw.com](mailto:kverhalen@taftlaw.com)  
[vherring@taftlaw.com](mailto:vherring@taftlaw.com)

### **AMERICAN TRANSMISSION COMPANY LLC**

/s/ Eric F. Swanson

Eric F. Swanson  
Winthrop & Weinstine, P.A.  
225 South Sixth Street, Suite 3500  
Minneapolis, MN 55402  
[eswanson@winthrop.com](mailto:eswanson@winthrop.com)  
(612) 604-6400



***Example Notice Letter***

August 7, 2025

**NOTICE OF PROPOSED TRANSMISSION LINE PROJECT**

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

**PLEASE TAKE NOTICE** that Minnesota Power and American Transmission Company LLC by and through its corporate manager ATC Management Inc. (collectively, the “Applicants”) are applying to the Minnesota Public Utilities Commission (also “Commission”) for a Certificate of Need to construct the Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project (“ISA Project” or “Project”).

**Project Description**

The ISA 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 St. Louis County, Minnesota. The Project also involves construction of a new, approximately one-mile-long, double-circuit 345 kV transmission line from Minnesota Powers’ St. Louis County Substation to ATC’s Arrowhead Substation in Hermantown, St. Louis County, Minnesota. A map of the ISA project is provided as **Attachment A**.

**Project Need**

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

**Regulatory Review Process**

Before the Applicants can construct the Project, the Minnesota Public Utilities Commission (“Commission”) must determine whether the Project is needed (Certificate of Need) and if so, will determine the route along which the Project will be built (Route Permit).

The Certificate of Need process is governed by Minnesota Law, including Minnesota Statutes section 216B.243, and Minnesota Rules Chapter 7849, specifically Rules parts 7849.0010 to 7849.0400 and 7849.1000 to 7849.2100. A copy of the Certificate of Need application, once submitted, can be obtained by visiting the Commission's website at [www.mn.gov/puc/](http://www.mn.gov/puc/) in Docket No. E015/CN-25-111.

In addition to certifying the need for the Project, the Commission must also grant a Route Permit for the Project. The routing of the Project is also governed by Minnesota Law, including Minnesota Statutes Chapter 216I. A copy of the Route Permit Application, once submitted, can be obtained by visiting the Commission's website in Docket No. E015/TL-25-112.

The Commission will not make its determinations on the Certificate of Need or Route Permit until it has completed a thorough review process that encourages public involvement and analyzes the impacts of the Project and various route alternatives. Because the Applicants anticipate requesting a joint proceeding for the Certificate of Need and Route Permit, a single environmental review document will be prepared. This process includes preparation of an Environmental Assessment ("EA") for the Project that will be submitted with the Route Permit Application. An addendum to the EA may be prepared by the Commission after the public information meetings are held in early 2026.

The Applicants will submit an application for a Route Permit with one proposed route for the proposed transmission line. Other routes can be proposed to be evaluated during the scoping process. The Commission staff will decide which routes get studied in the addendum to the EA and considered for approval. Routes that have been shown at public meetings are preliminary and subject to change. In addition, other, new routes may also be studied and considered for approval.

The Commission will review all of the data from the public process and will decide if the Project is needed and which route should be approved. Selection of a final route by the Commission will be based on an evaluation of the routes guided by the factors identified in Minnesota Statutes section 216I.05, subd. 11 and stakeholder input received during the regulatory process. The table below provides a high-level summary of the major steps in the regulatory process.

### **Summary of Regulatory Schedule**

<b>Action</b>	<b>Approximate Date</b>
Pre-application study and public meeting and stakeholder outreach	May and August 2025
Certificate of Need and Route Permit Application and EA submitted to Commission	December 2025
Informational and Scoping Meetings (public meeting and comment)	February 2026
Addendum to Environmental Assessment Issued	May 2026
Public Hearings (public meeting and comment period)	June 2026
Commission Decision	July 2026

### **Right-of-Way for the Project**

Before beginning construction, the Applicants will acquire property rights for the right-of-way, typically through an easement that will be negotiated with the landowner for each parcel. The Applicants anticipate acquiring easements with a minimum right-of-way width of approximately 150 feet for the 345 kV transmission line. Where these transmission lines parallel existing lines, fewer new rights-of-way may be required because the new transmission line may share a portion of the existing right-of-way.

### **Proposed Structures for the Project**

The specific type and size of structures to be used will depend on the route identified in this process along with land use/land cover, topography, water/wetlands, and soil types. Currently, structures for the Project are anticipated to be 120- to 180-foot high single-pole weathering steel structures with arms on both sides of the structure. For this type of structure, the Applicants anticipate having five to eight structures for each mile of the line.

### **Additional Information and Mailing Lists**

To subscribe to the Project's Certificate of Need docket (E015/CN-25-111) and to receive email notifications when information is filed in that docket, please visit [www.mn.gov/puc/](http://www.mn.gov/puc/) and click on "eDockets," then click on "Go to eDockets," and then click on "Sign In" in the top right corner. Then, click on "Subscriptions" and "Create a Subscription." In the "Docket #" box, type 25-111 and click "Create." These same steps can be followed to subscribe to the Project's Route Permit docket 25-112.

If you would like to have your name added to the Project Route Permit proceeding mailing list (E015/TL-25-112) you may register by contacting the public advisor in the consumer affairs office at the Commission at [consumer.puc@state.mn.us](mailto:consumer.puc@state.mn.us), or (651) 296-0406 or 1-800-657-3782. Please be sure to note: 1) how you would like to receive notices (regular mail or email) and 2) your complete mailing or email address.

A separate mailing list is maintained for the Certificate of Need proceeding (E015/CN-25-111). To be placed on the Project Certificate of Need mailing list (MPUC Docket No. E015/CN-25-111), mail, fax, or email Robin Benson at Minnesota Public Utilities Commission, 121 7th Place E., Suite 350, St. Paul, MN 55101-2147, Fax: 651-297-7073 or [robin.benson@state.mn.us](mailto:robin.benson@state.mn.us).

If you have any questions about the state regulatory process, you may contact the Minnesota state regulatory staff listed below:

**Minnesota Public Utilities Commission**

Energy Infrastructure Permitting Staff

**Staff Name**

121 7th Place East, Suite 350  
St. Paul, Minnesota 55101

**Staff Phone Number**

1-800-657-3782

**Staff Email**

Website: [www.mn.gov/puc/](http://www.mn.gov/puc/)

Please visit the Project website at: <https://isatransmissionproject.com/> for more information. Project phone and e-mail addresses are:

**Project Phone Number: 1-888-510-5303**

**Project E-mail Address:** [connect@isatransmissionproject.com](mailto:connect@isatransmissionproject.com)

**Transmission Planning Process in Minnesota**

Minnesota Statutes section 216B.2425, subd. 2 requires that each electric transmission-owning utility in the state file a biennial transmission planning report with the Commission in the fall of each odd-numbered year. These reports provide information on the transmission planning process used by the utilities in the state of Minnesota and information about other transmission line projects. The 2023 Biennial Transmission Projects Report is available at: [www.minnelectrans.com](http://www.minnelectrans.com). The 2023 Biennial Transmission Projects Report was submitted on November 1, 2023. An updated planning report will be submitted by November 1, 2025.

Sincerely,



---

Zach Golkowski  
Minnesota Power  
Senior Environmental Compliance  
Specialist

Figure 1. ISA Project Notice Area

