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August 27, 2025

—Via Electronic Filing—

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

Re: Notice Plan Petition

*In the Matter of the Application for a Certificate of Need for the Maple River to
Cuyuna 345 kV Transmission Line Project*
Docket No. E015,ET2,E017/CN-25-109

Dear Mr. Bull:

Minnesota Power, Great River Energy, and Otter Tail Power Company 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 me.

Sincerely,

/s/ Kodi J. Verhalen

Kodi J. Verhalen

Taft Stettinius & Hollister LLP

On behalf of Minnesota Power, Great River Energy, and Otter Tail Power Company

cc: Service List
General Service List of Persons Interested in Power Plants and Transmission
Lines

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 THE MAPLE
RIVER - CUYUNA 345 kV TRANSMISSION
LINE PROJECT

Docket No. E015,ET2,E017/CN-25-109

NOTICE PLAN PETITION

**Public Comments on Notice Plan Petition can be submitted to the Minnesota
Public Utilities Commission Until 4:30 p.m. on September 16, 2025**

**Replies to Comments can be submitted to the Minnesota Public Utilities
Commission until 4:30 p.m. on October 6, 2025**

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

I. INTRODUCTION

Minnesota Power, Great River Energy, and Otter Tail Power Company (collectively, “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 Maple River – Cuyuna 345 kV Transmission Project (“Project”). The Applicants intend to submit a Certificate of Need application pursuant to Minn. Stat. § 216B.243 in February 2026 and submit a Route Permit application pursuant to Minn. Stat. § 216I.05 in the third quarter of 2026.

The Project consists of construction of a new 345 kV single-circuit transmission line, on double-circuit capable structures, connecting Minnesota Power’s Cuyuna Substation in Crow Wing County to Otter Tail Power Company’s Maple River Substation in Cass County, North Dakota.

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 MISO’s 2024 Transmission Expansion Plan (“MTEP24”). The LRTP Tranche 2.1 portfolio is made up of 24 projects, including Project Number 20, the Maple River – Cuyuna 345 kV Transmission Project. The Project, as part of the LRTP Tranche 2.1 portfolio, is needed to support the reliability of the regional transmission system, particularly in northwestern and central Minnesota and eastern North Dakota; provide additional transmission capacity and regional transfer capability to reliably integrate new renewable generation; meet growing electrical demand, enhance resiliency during extreme weather events, and enable cost-effective regional energy transfers supporting economical grid operations.

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 an application for a Certificate of Need in February 2026. Applicants, therefore, submit this Notice Plan for the Commission’s approval.

II. 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 consists of a series of corridors that are generally three miles wide and centered on existing high voltage transmission lines. The Notice Area expands up to nearly 14 miles wide in some areas to provide routing flexibility. The Notice Area crosses portions of stretches across Becker, Cass, Clay, Crow Wing, Hubbard, Otter Tail, Wadena,

and Wilkin 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, and the creation of a Project website that includes Project information, ways to provide input, and interactive, detailed maps. The Project website can be viewed at: mrctransmissionproject.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, 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 geospatial information system (“GIS”) county parcel records from Becker, Cass, Clay, Crow Wing, Hubbard, Otter Tail, Wadena, and Wilton 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 Becker, Cass, Clay, Crow Wing, Hubbard, Otter Tail, Wadena, and Wilton 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**. Applicants will provide direct mail notice to the Tribal Nations and other Tribal government officials and administrators listed in **Attachment B**.

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**.

B. Newspaper Notice

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

Table 1. Newspaper Notice

<u>Name of Newspaper</u>	<u>County of Circulation</u>
Star Tribune	Statewide
Detroit Lakes Tribune	Becker County
Pine Cone Press-Citizen	Cass County
The Extra	Clay County
InForum	Clay County
Brainerd Dispatch	Crow Wing County
Crosby-Ironton Courier	Crow Wing County
Park Rapids Enterprise	Hubbard County
Fergus Falls Daily Journal	Otter Tail County, Wilkin County
Wadena Pioneer Journal	Wadena County
The Review Messenger	Wadena County
Wahpeton Daily News	Wilkin 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 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 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. R. 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 variance¹ 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 notice letter references the preparation of an environmental assessment rather than an environmental report, as anticipated for the proposed proceeding and the use of the alternative process for the routing of the Project.

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.

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.

¹ *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).

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.

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.²

² *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).

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 jjevans@allete.com	Brian Meloy Great River Energy 12300 Elm Creek Blvd Maple Grove, MN 55369 bmeloy@grenergy.com
Drew Janke Minnesota Power 30 West Superior Street Duluth, MN 55802 djanke@mnpower.com	Mark Strohfus Great River Energy 12300 Elm Creek Blvd Maple Grove, MN 55369 mstrohfu@grenergy.com
Hannah Mitchell Minnesota Power 30 West Superior Street Duluth, MN 55802 hmittchell@mnpower.com	Owen Henriksen Great River Energy 12300 Elm Creek Blvd Maple Grove, MN 55369 ohenriksen@grenergy.com
Jennifer Kuklenski Minnesota Power 30 West Superior Street Duluth, MN 55802 jkuklenski@mnpower.com	Robert Endris Otter Tail Power Company 215 S. Cascade St. Fergus Falls, MN 56537 rendris@otpc.com
Kodi Jean Verhalen Taft Stettinius & Hollister LLP 2200 IDS Center 80 South 8 th Street Minneapolis, MN 55402-2157 kverhalen@taftlaw.com	Craig Steingaard Otter Tail Power Company 215 S. Cascade St. Fergus Falls, MN 56537 csteingaard@otpc.com
Valerie T. Herring Taft Stettinius & Hollister LLP 2200 IDS Center 80 South 8 th Street Minneapolis, MN 55402-2157 vherring@taftlaw.com	

III. 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; and (2) grant a variance from the additional publication in a statewide newspaper under Minn. R. 7829.2500, subp. 5 and; (3) grant a variance to modify the time for implementation of the Notice Plan under Minn. R. 7829.2550, subp. 6 to no more than 90 days and no less than two weeks prior to the filing of the Certificate of Need application.

August 27, 2025

Respectfully submitted,

TAFT STETTINIUS & HOLLISTER LLP

/s/ Kodi J. Verhalen

Kodi J. Verhalen
Valerie T. Herring
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ATTORNEYS FOR MINNESOTA POWER,
GREAT RIVER ENERGY, AND OTTER TAIL
POWER COMPANY

Example Notice Letter

DATE, 2025

NOTICE OF PROPOSED TRANSMISSION LINE PROJECT

**Re: In the Matter of Application for a Certificate of Need for the Maple River – Cuyuna 345 kV Transmission Project
Docket No. E015,ET2,E017/CN-25-109**

PLEASE TAKE NOTICE that Minnesota Power, Great River Energy, and Otter Tail Power Company (the “Applicants”) are applying to the Minnesota Public Utilities Commission (also “Commission”) for a Certificate of Need for the Maple River – Cuyuna 345 kV Transmission Project (“Project”).

Project Description

The Project consists of construction of a new 345 kV single-circuit transmission line, on double-circuit capable structures, connecting Minnesota Power’s Cuyuna Substation in Crow Wing County to Otter Tail Power Company’s Maple River Substation in Cass County, North Dakota.

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 MISO’s 2024 Transmission Expansion Plan (“MTEP24”). The LRTP Tranche 2.1 portfolio is made up of 24 projects, including Project Number 20, the Maple River – Cuyuna 345 kV Transmission Project. The Project, as part of the LRTP Tranche 2.1 portfolio, is needed to support the reliability of the regional transmission system, particularly in northwestern and central Minnesota and eastern North Dakota; provide additional transmission capacity and regional transfer capability to reliably integrate new renewable generation; meet growing electrical demand, enhance resiliency during extreme weather events, and enable cost-effective regional energy transfers supporting economical grid operations.

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/ in Docket No. E015,ET2,E017/CN-25-109.

In addition to certifying the need for the Project, the Commission must also grant a Route Permit for the Project before it may be constructed. 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,ET2,E017/TL-25-110. The Applicants will be submitting an application for Route Permit with a proposed route for the new 345 kV transmission line. Other routes can be proposed to be evaluated during the Route Permit proceeding. Routes that have been shown at public meetings are preliminary and subject to change.

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. The Commission will complete an Environmental Report ("ER") for the Certificate of Need and an Environmental Impact Statement ("EIS") or an Environmental Assessment ("EA") for the Route Permit.³ However, should the Commission choose to use a joint proceeding for the Certificate of Need and Route Permit, any ER requirements will be incorporated into the EIS or EA and the EIS or ER will be the sole environmental review document prepared for the Project.

The Commission will review all of the data from the public process and will decide if the Project is needed and if it is needed, 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 actors identified in Minnesota Statutes section 216I, 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.

³ Whether an EIS or an EA will be prepared for the Route Permit process will depend on the route proposed for the Project.

Summary of Certificate of Need Regulatory Schedule

Action	Approximate Date
Pre-application study and public meeting and stakeholder outreach	2 nd and 4 th Quarters 2025
Certificate of Need Application submitted to Commission	February 2026
Public Information and Scoping Meetings (public meeting and comment)	2 nd Quarter 2026
ER Issued ⁴	3 rd Quarter 2026
Public Hearings (public meeting and comment period)	4 th Quarter 2026
Commission Decision	1 st Quarter 2027

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 of approximately 150-feet wide for the 345 kV transmission line. Where these transmission lines parallel existing lines, less new right-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. The current structure design is 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 and to receive email notifications when information is filed in that docket, please visit 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 25-109 and click "Create." These same steps can be followed to subscribe to the Project's Route Permit Docket No. E015,ET2,E017/TL-25-110.

If you would like to have your name added to the Certificate of Need proceeding mailing list (Docket No. E015,ET2,E017/CN-25-109), you may register by contacting Robin Benson at Minnesota Public Utilities Commission, 121 7th Place E., Suite 350, St. Paul,

⁴ If the Certificate of Need and Route Permit applications are processed jointly by the Commission, an EIS or EA will be prepared as the environmental document for the Project.

MN 55101-2147, Fax: 651-297-7073 or robin.benson@state.mn.us. 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 Route Permit proceeding (E015,ET2,E017/TL-25-110). To be placed on the Project Route Permit mailing list, you may register by contacting the public advisor in the consumer affairs office at the Commission at 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.

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/

Please visit the Project website at: mrctransmissionproject.com for more information.

Project phone and e-mail addresses are:

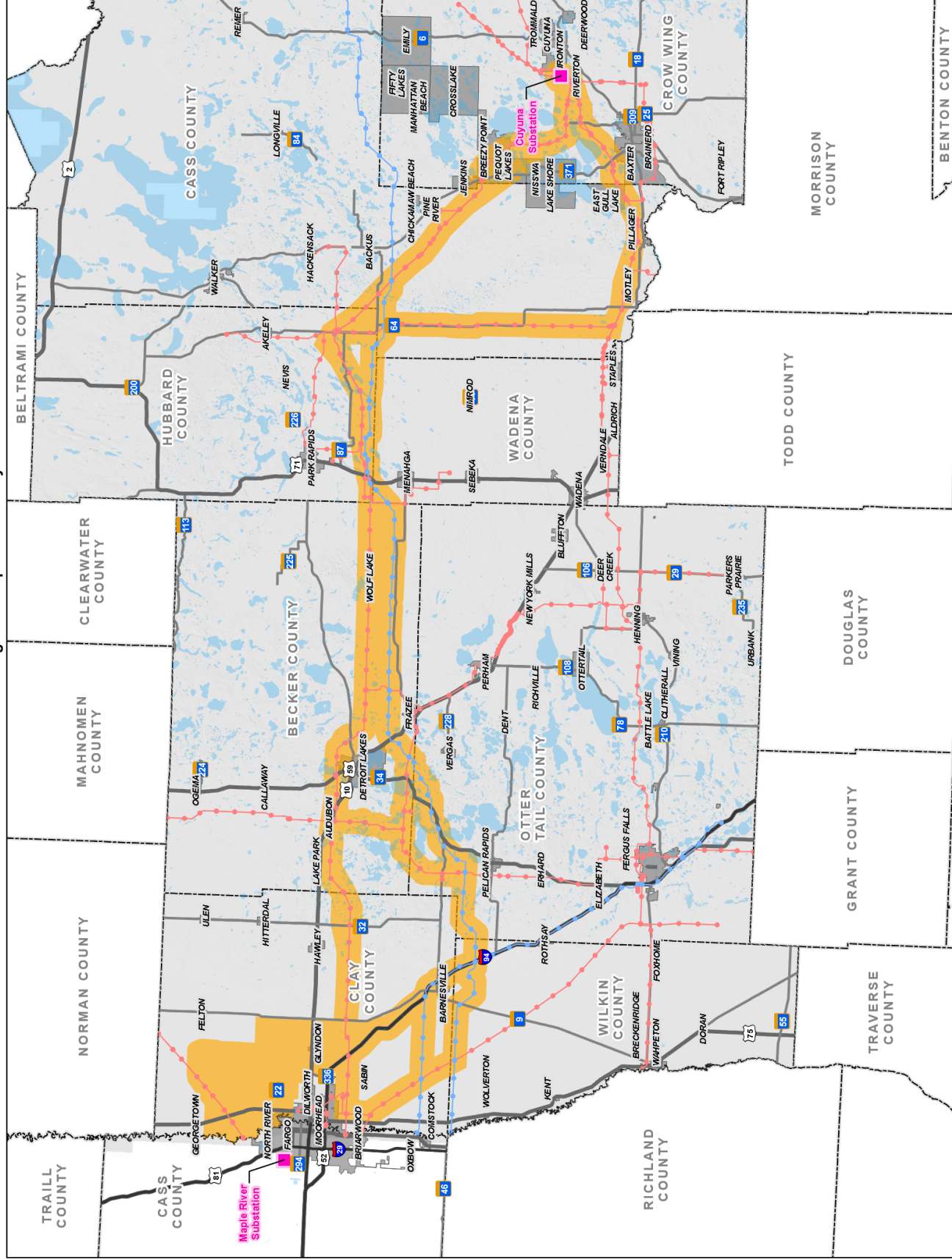
- 1-888-419-5670
- connect@mrctransmissionproject.com

Transmission Planning Process in Minnesota

Minnesota Statutes § 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. The 2023 Biennial Transmission Projects Report was submitted on November 1, 2023. An updated planning report will be submitted later in 2025.

Sincerely,

Attachment A



Maple River- Cuyuna Project



For Environmental Review Purposes Only