12300 Elm Creek Blvd
Maple Grove, MN 55369

30 W Superior St
Duluth, MN 55802

215 S Cascade St
Fergus Falls, MN 56537

January 30, 2026

—Via Electronic Filing—

Sasha Bergman
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101-2147

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

Dear Ms. Bergman:

Minnesota Power, Great River Energy, and Otter Tail Power Company (collectively the "Applicants"), submit this Application for a Certificate of Need ("Application") to the Minnesota Public Utilities Commission ("Commission") for the Maple River – Cuyuna 345 kV Transmission Project ("Project").

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 northern Minnesota and eastern North Dakota; provide additional transmission capacity and regional transfer capability to reliably integrate future generation resources; meet growing electrical demand, enhance resiliency during extreme weather events, and enable cost-effective regional energy transfers supporting economical grid operations.

The Project consists of construction of a new 345 kV double-circuit transmission line, operated initially as a single transmission line, connecting Minnesota Power's Cuyuna Substation in Crow Wing County, Minnesota, to Otter Tail Power Company's Maple River Substation in Cass County, North Dakota. The Project will be approximately 160 to 180 miles in length depending on the final route selected, with approximately 6-10 miles of its length in North Dakota.

The Applicants understand that the Commission will be issuing invoices for the application fees required under Minn. R. 7849.0210 and Minn. R. 7849.2100. The invoiced fees will be paid out of Minnesota Power's existing funding account managed by the Department of Commerce.

A short summary of this Application is being distributed as required by Minn. R. 7829.2500, Subp. 3 and the Commission's Order Approving the Notice Plan for the Project as noted on the attached certificate of service. Please note that the Applicants have designated portions of Appendix H of the Application as NONPUBLIC. Public and nonpublic versions of this Appendix have been provided and a Trade Secret Justification is attached hereto.

Also, to ensure the orderly service of any information requests prior to the assignment of an administrative law judge to these proceedings, we ask that the following individuals receive service of any information requests during this interim period:

Jackson Evans	jjevans@mnpower.com
Jim Atkinson	jbatkinson@mnpower.com
Drew Janke	djanke@mnpower.com
Christian Winter	cwinter@mnpower.com
Jennifer Kuklenski	jkuklenski@mnpower.com
Hannah Mitchell	hmitchell@mnpower.com
Minnesota Power Discovery Manager	discoverymanager@mnpower.com
Kodi Verhalen	kverhalen@taftlaw.com
Valerie Herring	vherring@taftlaw.com
Spencer Rojas	srojas@taftlaw.com
Craig Steingaard	csteingaard@otpco.com
Robert Endris	rendris@otpco.com
Regulatory Filing Coordinator	regulatory_filing_coordinators@otpco.com
Owen Henriksen	ohenriksen@grenergy.com
Brian Meloy	bmeloy@grenergy.com

In a March 4, 2025 letter, Commission staff requested that the Applicants provide status updates every 45 days on the anticipated timing of the filing of the Certificate of Need and Route Permit application and in-service date for the Project until the application for the Project was filed. As required by this letter, the Applicants provided seven status updates for this Project, the last of which was filed on December 23, 2025. As the Applicants are now filing the Application for a Certificate of Need, which also includes information on when the Applicants will file the Route Permit Application, the Applicants will no longer be providing these 45-day status updates.

If you have questions or need additional information, please contact Jim Atkinson, Manager – Siting and Land Rights, at jbatkinson@mnpower.com, or Jennifer Kuklenski, Manager – Regulatory Strategy and Policy, at jkuklenski@mnpower.com.

Sincerely,

/s/ Daniel Gunderson
Daniel Gunderson
Minnesota Power
Vice President – Transmission System Planning & Operations

/s/ Priti Patel
Priti Patel
Great River Energy
Vice President and Chief Transmission Officer

/s/ JoAnn Thompson

JoAnn Thompson
Otter Tail Power Company
Vice President – Asset Management

Attachments

cc: Service List

STATEMENT REGARDING JUSTIFICATION FOR EXCISING TRADE SECRET INFORMATION

Pursuant to the Commission's Data Practices Policy – Not Public Data in Commission Proceedings in furtherance of the intent of Minn. Stat. § 13.37 and Minn. R. 7829.0500, Subp. 5, Minnesota Power, Great River Energy, and Otter Tail Power Company (collectively, the "Applicants") have designated portions of Appendix H of the enclosed Application for a Certificate of Need for the Maple River – Cuyuna 345 kV Transmission Line Project ("Project") as trade secret. A description of the excised information in these appendices are marked as trade secret are as follows:

Appendix H – Applicants' 2025 Annual Electric Utility Forecast Report. The excised material from this appendix contains confidential, competitive information about the methods, techniques, and processes for supplying electric service implemented by Minnesota Power and Otter Tail Power Company. The excised material also includes energy usage by specific customers and generation by fuel type.

The Applicants follow strict procedures to maintain the confidentiality of this excised information. The Applicants believe that this statement justifies why the information excised from the attached filing should remain a trade secret under Minn. Stat. § 13.37. The Applicants respectfully requests the opportunity to provide additional justification in the event of a challenge to the designation provided herein.