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**VIA ELECTRONIC DELIVERY**

April 1, 2026

Sasha Bergman  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place E, Suite 350  
St. Paul, Minnesota 55101

**Re: *In the Matter of the Application for a Certificate of Need for the Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project; Comments by the Midcontinent Independent System Operator, Inc. in Response to Notice of Complete Application and Public Information and Scoping Meetings; Docket No. E015/CN-25-111***

Dear Ms. Bergman:

The Minnesota Public Utilities Commission (“Commission”) in the above-referenced case provided interested persons the opportunity to comment upon the certificate of need application pending before the Commission for approval to construct the Iron Range-St. Louis County-Arrowhead 345 kV Transmission Project (“ISA Project” or “Project”) proposed by Minnesota Power and American Transmission Company, LLC (“Applicants”). I submit comments on behalf of the Midcontinent Independent System Operator, Inc. (“MISO”).

**I. Introduction**

In a notice issued on March 12, 2026, the Commission stated that it would be holding meetings to “[p]rovide information about the proposed project . . . ”<sup>1</sup> and also provided that “[w]ritten comments will be accepted **through Thursday, April 23, 2026, by 4:30 p.m.**”<sup>2</sup>

MISO submits these comments to provide additional information related to the MISO planning process that identified and studied the proposed Project.

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<sup>1</sup> Notice of Complete Application and Rescheduled Public Information and Scoping Meetings at 3.

<sup>2</sup> *Id.* at 5 (emphasis in original).



## II. Background

The Application seeks authorization to construct, operate, and maintain the ISA Project. MISO transmission planning includes the Project as an integral part of the Long Range Transmission Planning (“LRTP”) Tranche 2.1 portfolio of twenty-four transmission projects. The Project includes approximately 33 miles of new single-circuit 345 kV line from the Iron Range Substation to St. Louis County, replacement of approximately 33 miles of existing 230 kV line with a 345 kV circuit from a point north of the St. Louis River in St. Louis County to the St. Louis County Substation, and approximately 1.5 miles of new double-circuit 345 kV transmission line in the St. Louis County Substation area.<sup>3</sup>

## III. Comment: The Project Resulted from the MISO Long-Range Transmission Planning Process

MISO is a not-for-profit, member-based regional transmission organization providing reliability and market services over more than 75,000 miles of transmission lines in fifteen states and one Canadian province, including throughout the State of Minnesota. MISO is responsible for the operational oversight and control, market operations, and planning of the transmission systems of its member transmission owners, including the Applicants.

The MISO regional planning process adheres to the FERC Order Nos. 890 and 1000 open and transparent planning principles.<sup>4</sup> This process involves numerous evaluations of project proposals and their effectiveness in meeting long-range transmission system needs, and provides multiple opportunities for stakeholders to review a project’s need, design, and effectiveness.<sup>5</sup> MISO’s transmission planning focuses on meeting long-range regional transmission system needs, not near-term local load serving objectives that have been the

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<sup>3</sup> Application at 1.

<sup>4</sup> *Preventing Undue Discrimination and Preference in Transmission Service*, Order No. 890, FERC Stats. & Regs. ¶ 31,241, *order on reh’g*, Order No. 890-A, FERC Stats. & Regs. ¶ 31,261 (2007), *order on reh’g and clarification*, Order No. 890-B, 123 FERC ¶ 61,299 (2008), *order on reh’g*, Order No. 890-C, 126 FERC ¶ 61,228 (2009), *order on clarification*, Order No. 890-D, 129 FERC ¶ 61,126 (2009); *Transmission Planning and Cost Allocation by Transmission Owning and Operating Public Utilities*, Order No. 1000, 136 FERC ¶ 66,051 (2011), *order on reh’g*, Order No. 1000-A, 139 FERC ¶ 61,132 (2012), *order on reh’g and clarification*, Order No. 1000-B, 141 FERC ¶ 61,044 (2012).

<sup>5</sup> *See, e.g.*, Application at 29-75 (describing MISO’s LRTP planning process and results).



subject of comment in this docket.<sup>6</sup> Throughout the multi-year planning process involved in developing the LRTP Tranche 2.1 portfolio, the Project has been considered an integral part of the overall transmission system in MISO’s footprint. The Project will provide substantial reliability, economic, and public policy benefits to Minnesota, and contribute to continued development of a reliable and economical regional transmission system.

MISO’s LRTP Tranche 2.1 portfolio will bring numerous benefits to the MISO Midwest Subregion,<sup>7</sup> which includes Minnesota. The LRTP Tranche 2.1 portfolio will enable the delivery of increased levels of renewable energy generation and provide for economic benefits in excess of the portfolio costs to the Midwest Subregion. Each project in LRTP Tranche 2.1 was determined to be a necessary component of the overall portfolio of projects. The Project is necessary to prevent numerous reliability issues that will occur for the projected future system if the Project is not completed.

#### IV. Conclusion

The proposed Project was developed as part of a long-range regional transmission planning process, and is designed to provide regional reliability and economic benefits. The ISA Project is the most effective option for meeting the needs of the transmission system.

Sincerely,

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<sup>6</sup> Comments were filed by persons who oppose the addition of a proposed Hermantown Data Center. *See, e.g.*, Gramdorf Comment (Feb. 23, 2026), Akre Comment (Feb. 12, 2026), Vileneuve Comment (Feb. 12, 2026), and Fitzpatrick Comment (Feb. 11, 2026). Comments were filed by stated members of the “Stop The Hermantown Data Center,” or “SHDC.” *See, e.g.*, Blesi Comment (Feb. 12, 2026), McDonough Comment (Feb. 12, 2026), Carlson Comment (Feb. 10, 2026), and Richtman Comment (Feb. 10, 2026). Comments were filed by persons using closely related language, mentioning that the proposed Hermantown Data Center is “adjacent” to an ATC substation. *See, e.g.*, A. Berg Comment (Feb. 12, 2026), Anderson Comment (Feb. 12, 2026), Thornton Comment (Feb. 9, 2026), and L. Berg Comment (Feb. 9, 2026).

<sup>7</sup> The “Midwest Subregion” begins in Missouri and extends northward to the Canadian border and is bounded by Michigan and eastern Montana.



## CERTIFICATE OF SERVICE

A true and correct copy of the Comments by the Midcontinent Independent System Operator, Inc., on this 1<sup>st</sup> day of April, 2026, has been efiled by posting the same on eDockets in the above-referenced docket. The Comments have also been served on the Service List on file with the Minnesota Public Utilities Commission.

/s/Kayleigh Khavari  
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