

# Northland Reliability Project



April 13, 2026

VIA E-FILING

Sasha Bergman  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, MN 55101-2147

**Re: Variance Analysis Information (Order Point 4 and Route Permit Section 6.10)**

*In the Matter of the Application of Minnesota Power and Great River Energy for a Certificate of Need and Route Permit for the Northland Reliability Project 345 kV Transmission Line*

MPUC Docket Nos. E015,ET2/TL-22-416 and E015,ET2/TL-22-415

Dear Ms. Bergman:

On February 28, 2025, the Minnesota Public Utilities Commission (“Commission”) issued an order (“Order”) granting Great River Energy and Minnesota Power (“Permittees”) a Certificate of Need and issuing a Route Permit for the Northland Reliability Project (“Project”). On December 16, 2025, the Permittees notified the Commission that the Midcontinent Independent System Operator, Inc. (“MISO”) initiated a Variance Analysis under Attachment FF of the MISO Tariff for the Project.

In compliance with Order Point 4 and Section 6.10 of the Route Permit, the Permittees hereby submit the information provided by the Permittees to MISO as part of the MISO Variance Analysis process, consistent with the Permittees’ MISO Tariff.<sup>1</sup> On March 24, 2026, MISO requested that the Permittees provide substation one-line diagrams to illustrate the planned configuration of Project facilities, both pre-Project and post-Project. A copy of the Permittees’ response is included as **Attachment A**. The attachments included with the Permittees’ response are marked as critical energy infrastructure information (“CEII”) as defined by 18 C.F.R. § 388.112. Please note that the attachments to the response to MISO are trade secret in their entirety. A statement regarding trade secret information and justification for excising security information is also included at **Attachment B**.

---

<sup>1</sup> The Permittees’ submitted the information to MISO on April 6, 2026.

Ms. Bergman  
April 13, 2026  
Page 2

If you have any questions or need additional information, please contact Christian Winter at [CWinter@mnpower.com](mailto:CWinter@mnpower.com) or Matthew Ellis at [MEllis@GREnergy.com](mailto:MEllis@GREnergy.com).

/s/ Christian Winter

Christian Winter  
Minnesota Power  
Manager – Regional Transmission  
Planning

/s/ Matthew Ellis

Matthew Ellis  
Great River Energy  
Director – Transmission Planning &  
Compliance

cc: Service Lists

# Northland Reliability Project



April 6, 2026

Alex Monn  
Manager – Competitive Transmission Administration  
Midcontinent Independent System Operator, Inc.

## **RE: GRE and MP Response to Request for Substation One-Line Diagrams for MTEP21 LRTP Project 03 Iron Range – Benton County – Big Oaks**

Dear Mr. Monn,

In response to your request for substation one-line drawings illustrating the current configuration of the above-referenced project, we have enclosed the following drawings:

1. Overall Project Single Line Diagram
2. Iron Range Substation Pre-Project General Arrangement & Three Line Diagram
3. Iron Range Substation Post-Project General Arrangement & Three Line Diagram
4. Cuyuna Substation Post-Project General Arrangement & Three Line Diagram
5. Benton County & Cherry Park Substations Pre- and Post-Project General Arrangement

Please note that all of the provided drawings contain critical energy infrastructure information (CEII) and should be treated as confidential non-public information. Also, all drawings are still preliminary and subject to change as detailed engineering for the Project is still in process. If you have any further questions or need clarification on any of the information provided in this response, please do not hesitate to contact either of us.

Sincerely,

Christian Winter  
*Manager, Regional Transmission Planning*  
Minnesota Power

Matt Ellis  
*Director, Transmission Planning & Compliance*  
Great River Energy

### Attachments

- 01\_CEII\_NRP Variance Request\_Rev 3\_Final.pdf
- 02\_CEII\_Iron Range\_Existing.pdf
- 03\_CEII\_Iron Range\_GA-3Lines\_PRELIMINARY\_1.pdf
- 04\_CEII\_Cuyuna\_GA-3Lines\_PRELIMINARY\_1.pdf
- 05\_CEII\_BentonCo-CherryPark.pdf

**PUBLIC DOCUMENT  
TRADE SECRET SECURITY INFORMATION AND CRITICAL ENERGY  
INFRASTRUCTURE INFORMATION EXCISED IN ITS ENTIRETY**

# **ATTACHMENT A-01: OVERALL PROJECT SINGLE LINE DIAGRAM**

**PUBLIC DOCUMENT  
TRADE SECRET SECURITY INFORMATION AND CRITICAL ENERGY  
INFRASTRUCTURE INFORMATION EXCISED IN ITS ENTIRETY**

**ATTACHMENT A-02: IRON RANGE SUBSTATION  
PRE-PROJECT GENERAL ARRANGEMENT &  
THREE LINE DIAGRAM**

**PUBLIC DOCUMENT  
TRADE SECRET SECURITY INFORMATION AND CRITICAL ENERGY  
INFRASTRUCTURE INFORMATION EXCISED IN ITS ENTIRETY**

**ATTACHMENT A-03: IRON RANGE SUBSTATION  
POST-PROJECT GENERAL ARRANGEMENT &  
THREE LINE DIAGRAM**

**PUBLIC DOCUMENT  
TRADE SECRET SECURITY INFORMATION AND CRITICAL ENERGY  
INFRASTRUCTURE INFORMATION EXCISED IN ITS ENTIRETY**

**ATTACHMENT A-04: CUYUNA SUBSTATION  
POST-PROJECT GENERAL ARRANGEMENT &  
THREE LINE DIAGRAM**

**PUBLIC DOCUMENT  
TRADE SECRET SECURITY INFORMATION AND CRITICAL ENERGY  
INFRASTRUCTURE INFORMATION EXCISED IN ITS ENTIRETY**

**ATTACHMENT A-05: BENTON COUNTY &  
CHERRY PARK SUBSTATIONS PRE- AND POST-  
PROJECT GENERAL ARRANGEMENT**

## STATEMENT REGARDING TRADE SECRET JUSTIFICATION FOR EXCISING SECURITY INFORMATION

Pursuant to the Minnesota Public Utilities Commission's Revised Procedures for Handling Trade Secret and Privileged Data in furtherance of Minn. Stat. § 13.37 and Minn. Rule 7829.0500, the Permittees have designated these data as nonpublic data. The confidential information includes both Trade Secret information and Security Information as defined by Minn. Stat. § 13.37, subd. 1(a) and (b). The Security Information is Critical Energy/Electric Infrastructure Information ("CEII") as defined by 18 C.F.R. § 388.113(c)(1) and include sensitive electric system information of the type protected under federal CEII policies. In addition, portions of this information were submitted to, or developed within, the Midcontinent Independent System Operator, Inc. ("MISO") and are subject to confidentiality provisions contained in the MISO Tariff and related Business Practice Manuals.

Permittees are providing this information to the Commission solely for purposes of this proceeding. By providing this information, the Permittees do not waive any federal, tariff-based, or other applicable confidentiality protections. Given the sensitive nature of this information, access to the information should be limited to only Commission staff with a demonstrated need to review the information and appropriate safeguards should be in place to avoid public disclosure. All confidential information has been redacted from the public version of this filing.

Data in **Attachment A** has been deemed by the Permittees to be Trade Secret Security Information. **Attachment A** contains confidential information designated as Trade Secret as defined by Minn. Stat. § 13.37, subd. 1(b) that is materially sensitive and commercially valuable to the Permittees. The Permittees follow strict internal procedures to maintain the secrecy of this information.

**Attachment A** also contains confidential Security Information designated as CEII as defined by 18 C.F.R. § 388.113. Specifically, the data that are categorized as CEII are one one-line diagram, three three-line diagrams, and one pre- and post-project general arrangement diagram. Each diagram contains detailed representations of Permittees' transmission systems. The Permittees have requested that these diagrams be categorized as Security Information as they are comprised of CEII pursuant to the procedures established by the Federal Energy Regulatory Commission.

The Permittees believe that this statement justifies why the information excised from the attached filing should remain confidential Trade Secret Security Information under Minn. Stat. §13.37. The Permittees respectfully request the opportunity to provide additional justification in the event of a challenge to the designation provided herein.

Because the Permittees have classified the original attachments to the letter to MISO included at **Attachment A** as trade secret security information, the Permittees provide the following description of the excised material as required by Minn. R. 7829.0500, Subp. 3:

### **Attachment A-1**

Nature of the Material: Overall Project Single Line Diagram

Author: Minnesota Power and Great River Energy

General Import: This document represents contains detailed representations of Permittees' transmission systems. The data derives value from not being readily ascertainable by the public and is CEII as defined by 18 C.F.R. § 388.113, and therefore is maintained as a trade secret.

Date Prepared: April 6, 2026

### **Attachment A-2**

Nature of the Material: Iron Range Substation Pre-Project General Arrangement & Three Line Diagram

Author: Minnesota Power

General Import: This document represents contains detailed representations of Permittees' transmission systems. The data derives value from not being readily ascertainable by the public and is CEII as defined by 18 C.F.R. § 388.113, and therefore is maintained as a trade secret.

Date Prepared: April 6, 2026

### **Attachment A-3**

Nature of the Material: Iron Range Substation Post-Project General Arrangement & Three Line Diagram

Author: Minnesota Power

General Import: This document represents contains detailed representations of Permittees' transmission systems. The data derives value from not being readily ascertainable by the public and is CEII as defined by 18 C.F.R. § 388.113, and therefore is maintained as a trade secret.

Date Prepared: April 6, 2026

### **Attachment A-4**

Nature of the Material: Cuyuna Substation Post-Project General Arrangement & Three Line Diagram

Author: Minnesota Power

General Import: This document represents contains detailed representations of Permittees' transmission systems. The data derives value from not being readily ascertainable by the public and is CEII as defined by 18 C.F.R. § 388.113, and therefore is maintained as a trade secret.

Date Prepared: April 6, 2026

### **Attachment A-5**

Nature of the Material: Benton County & Cherry Park Substations Pre- and Post-Project General Arrangement

Author: Great River Energy

General Import: This document represents contains detailed representations of Permittees' transmission systems. The data derives value from not being readily ascertainable by the public and is CEII as defined by 18 C.F.R. § 388.113, and therefore is maintained as a trade secret.

Date Prepared: April 6, 2026