minnesota power

AN ALLETE COMPANY

Minnesota Power's Response to NDPSC Staff's Jan. 6, 2026 Request for Information
Case No. PU-25-304

Minnesota Power, an ALLETE Company, respectfully submits the following responses to the request for information dated January 6, 2026, regarding Minnesota Power's Application for a Certificate of Site Compatibility Application (Application) for the Longspur Wind Project (Project) filed with the North Dakota Public Utilities Commission (Commission) on December 30, 2025.

The Project provides the below definitions for general reference.

Project Area	The geographic footprint where project infrastructure will be constructed and operated, including turbine locations, access roads, collection lines, substations, and associated facilities. The Project Area is approximately 26,100 acres in Morton County.
Study Area	The Study Area analyzed for the Project is within the Project Area and is approximately 26,100 acres.
survey area	The survey area that the wildlife survey covered.

1. **Table 3.1-1 indicates that archaeological/cultural resources are not present. However, Section 5.4 indicates they are present. Please update the Table.**

   A. Section 6.4 notes that some sites may be eligible for the National Register of Historic Places; however, none are currently listed. Table 3.1-1 applies only to Commission designated exclusion areas including nationally or state-designated historic sites, landmarks, districts, markers, or archaeological sites, which are not present within the Project Area.

2. **Table 3.2-1 indicates that historical resources which are not designated as exclusion areas are not present. However, page 49 of the application indicates that historic farmsteads and cemeteries are in the Project Area but will be avoided. Please update the Table.**

   A. The Avoidance Table initially provided in the Application was limited to sites that could not be avoided. A Revised Avoidance Area Table 3.2-1 is provided along with this response as Attachment A. The revised table includes information regarding

whether the Avoidance Area is present in the Project Area and whether impacts have been avoided.

3. Please file copies of all Class I and Class III Cultural Resource reports with the Commission.

A. A Class I and Class III Cultural Resources Inventory of the Minnesota Power Longspur Windfarm Project, Morton and Mercer Counties, North Dakota was submitted for North Dakota State Historic Preservation Office (NDSHPO) review on December 22, 2025. NDSHPO responded on January 15 2026, that they found the report to be acceptable. Both the Class I and Class III Cultural Resources Inventory and the January 22, 2025 NDSHPO correspondence is attached hereto as Attachment B.

An addendum to the Class I and Class III Cultural Resources Inventory of Minnesota Power's Longspur Wind Project, Morton County, North Dakota (the "Addendum") is in the process of being finalized and is anticipated for submission to NDSHPO in January 2026. The addendum report is required due to changes within the Project since the original survey in early 2025. The Addendum is focused on shifts within turbine placement and associated facilities. The Addendum, once submitted to NDSHPO, will be filed with the Commission.

4. Please file copies of all architectural inventory reports with the Commission.

A. An Architectural Survey and Viewshed Report for the Minnesota Power Longspur Windfarm Project, Morton and Mercer Counties, North Dakota is in the process of being finalized, and is anticipated for submission to NDSHPO in January 2026. The architectural inventory report, once submitted to NDSHPO, will be filed with the Commission.

5. Please file a copy of the Noxious Weed Management Control Plan with the Commission and copies of correspondence with Morton County Weed Board related to its approval.

A. Minnesota Power has not yet finalized a Noxious Weed Management Plan with Morton County. The current draft, recently shared with the Morton County, is included in this response with record of correspondence with the County and is marked as Attachment C. Morton County does not have a formal approval process for weed plans. Minnesota Power is sharing a copy of its proposed plan to obtain feedback regarding its contents. An updated plan and additional records of coordination will be provided prior to construction.

6. **Page 54 of the application indicates that there are mineral interests managed by the North Dakota Department of Trust Lands located beneath (i.e., outside) the Project Area. However, Figure 8 shows mineral interests located throughout the Project Area. Does the ND Department of Trust Lands also own these parcels?**

   A. The North Dakota Department of Trust Lands does not own the parcels identified as Mineral Trust Land in Figure 8 of the Application. Minnesota Power has executed voluntary wind lease and easement option agreements with landowners where project infrastructure overlaps these areas. A review of Morton County's parcel maps confirms the land is privately owned, and the land is not owned by the North Dakota Department of Trust Lands.

7. **Please describe how the geotechnical evaluation that has yet to be performed will inform the layout and design of the project. Also, if any unstable areas are present as indicated on Page 53, please update Table 3.2-1 accordingly a. When is the geotechnical evaluation expected to be complete? b. File the geotechnical evaluation upon completion.**

   A. A geotechnical evaluation was completed for turbine locations, the O&M building, and the Longspur Substation. An additional survey is underway to address shifts in turbine placement from the original assessment. The original report is attached hereto as Attachment D, and a revised version will be provided upon request. The Project reviewed data provided by the North Dakota Geological Survey to assess areas of potential geologic instability. Areas identified as geologically unstable are located within the Project Area outside all proposed permanent or temporary impact areas. Minnesota Power is not proposing infrastructure within areas flagged by the North Dakota Geological Survey.

   The Avoidance Table initially provided in the Application was limited to sites that could not be avoided. Revised Avoidance Area Table 3.2-1 (Attachment A) is provided along with this response. The revised table includes information whether the Avoidance Area is present in the Project Area and whether impacts have been avoided.

8. **Were the two active bald eagle nests surveyed in 2025 and discussed on page 70 outside the Project Area? Are there a total of two or four nests that were identified? How far away are they from the nearest turbine?**

   A. The two historical nests observed in the 2025 eagle nest survey were the historical nest and new nest reported in the 2024 eagle nest survey. During the 2024 and 2025

surveys only two nests were detected within the survey area, which extended 2 miles from the Project boundary; no nests occur within the Project Area or Study Area. Nest one, which is west of the Project Area, is approximately 1.8 miles away from turbine one. Nest two, which is northeast of the Project Area, is approximately 3.05 miles from turbine 27.

9. **Please identify/describe the areas that (1) each wildlife survey covered, and (2) that the associated Study Area covered.**
   a. Did each wildlife survey cover the entire Project Area?
   b. Was each wildlife Study Area defined as 1-mile around the perimeter of the Project Area?

A. The wildlife surveys and the area that was surveyed are detailed below. Each survey covered the Project Area or areas identified as potential habitat within the Project Area. Not every wildlife survey area was defined as one mile around the perimeter of the Project Area. The studies, in accordance with United States Fish and Wildlife Service (USFWS) and North Dakota Game and Fish Department (NDGFD) guidance or recommendations, surveyed applicable portions of the Project.

i. The whooping crane habitat assessment, in accordance with communication from USFWS North Dakota Ecological Field Office staff in 2024 and NDGFD's 2021 KeyWind Energy Development in North Dakota: Best Management Practices, included an area that is approximately 482,331 acres and fully covered the Project Area and Study Area with a survey area extending approximately 3.1 and 12.4 miles from the Project boundary.

ii. The northern long-eared bat habitat assessment, in accordance with communication from USFWS's North Dakota Ecological Field Office staff in 2024 and USFWS's 2024 Range-Wide Indiana Bat and Northern Long-eared Bat Survey Guidelines, included 30,696 acres and fully covered the Project Area and Study Area with a survey area extending 1,000 feet from the Project boundary.

iii. The northern long-eared bat presence/absence survey, in accordance with methods in the USFWS's 2024 Range-Wide Indiana Bat and Northern Long-eared Bat Survey Guidelines, included an area of 13 acres. While the survey area was only 13 acres, it fully covered areas of potential northern long-eared bat habitat within the Project Area and Study Area.

iv. The bat acoustic activity survey, attached hereto as Attachment E, in accordance with USFWS's Land-based Wind Energy Guidelines and NDGFD's KeyWind Energy Development in North Dakota: Best Management Practices, included an area of approximately 25,933 acres which fully covered the Project Area as it existed at the time of the 2024 survey. Since that survey started, the Project Area included in the Application has increased by approximately 170 acres. This additional, non-surveyed area does not contain any permanent or temporary impacts.

v. The Dakota skipper habitat survey, in accordance with USFWS's 2024 Dakota Skipper Survey Protocol, included an area that is approximately 15,417 acres of desktop reviewed habitat and 2,965 acres of potential habitat. This area fully covers impacts of potential habitat in the Project Area and Study Area, with a survey area extending approximately 820 feet from the boundary of proposed impact.

vi. The grassland habitat assessment encompassed a survey area of 25,933 acres, which fully covered the Project Area as it existed at the time of the 2024 survey. Since that assessment, the Project Area included in the Application has increased by approximately 170 acres. This additional, non-surveyed area does not contain any permanent or temporary impacts.

vii. The 2024 and 2025 eagle nest surveys, in accordance with survey design based off USFWS's Land-based Wind Energy Guidelines and Eagle Conservation Plan Guidance: Module 1 – Land-based Wind Energy and NDGFD's KeyWind Energy Development in North Dakota: Best Management Practices, included an area that is approximately 86,610 acres and fully covered the Project Area and Study Area with a survey area that extends two miles from the project boundary.

viii. The 2024 and 2025 sharp-tailed grouse lek surveys, in accordance with NDGFD's survey protocol in 2014 Management Plan and Conservation Strategies for Greater Sage-grouse in North Dakota and recommendations described in 2021 KeyWind Energy Development in North Dakota: Best Management Practices, included an area that is approximately 90,735 acres and fully covered the Project Area and Study

Area with a survey area that extends two miles from the project boundary.

10. In the December 2, 2024, meeting notes the North Dakota Game and Fish Department recommended avoiding any grasslands within a 2-mile buffer of grouse leks. Is MN Power committed to following this recommendation?

A. Minnesota Power is committed to minimizing disturbance to sharp-tailed grouse by siting turbines outside unbroken grassland habitat and avoiding installation of collection lines in nesting habitat within one mile of leks during the lekking and nesting season (March 15–July 15). Avoiding all grasslands (unbroken and broken) within a two-mile buffer of grouse leks, as discussed during the December 2024 meeting with the North Dakota Game and Fish Department, was determined to be unattainable. To clarify, all turbines have been sited outside of unbroken grasslands.

11. Please provide a table showing the distance of all the leks from the nearest turbine location broken into active and inactive leks, noting the Lek ID for all historical, 2024, and 2025 surveys. Please also indicate if they are in the Project Area or Study Area.

A. A table providing information on leks, within the Project Area, and distance to nearest turbine is below:

Lek ID	2025 status	Within Project Area	Within survey area*	Nearest turbine ID	Approximate distance to nearest turbine
1	Active	No	Yes	T20	1.3 Miles
2	Active	No	Yes	T22	1.4 Miles
3	Active	No	Yes	T23	0.95 Miles
4	Inactive	Yes	Yes	T23	1.05 Miles
5	Inactive	Yes	Yes	T27	1.03 Miles
6	Inactive	Yes	Yes	T08	0.52 Miles
7	Active	No	Yes	T16	0.39 Miles
8	Active	No	No	T70	3.25 Miles
9	Active	No	Yes	T62	0.75 Miles
10	Active	No	Yes	T07	0.44 Miles

11	Inactive	No	Yes	T68	1.5 Miles
12	Inactive	No	Yes	T62	1.24 Miles
13	Active	Yes	Yes	T13	0.75 Miles
14	Active	Yes	Yes	T64	0.2 Miles
15	Active	Yes	Yes	T65	0.39 Miles
16	Active	No	Yes	T01	3.18 Miles
17	Active	No	Yes	T03	3.15 Miles
18	Active	No	Yes	T01	1.19 Miles
19	Active	No	Yes	T13	1.28 Miles
20	Active	No	Yes	T07	0.44 Miles
21	Active	Yes	Yes	T05	0.66 Miles
22	Active	No	Yes	T27	1.4 Miles
23	Active	No	Yes	T70	2.58 Miles
24	Active	No	Yes	T70	2.25 Miles
25	Active	No	Yes	T70	2.6 Miles
26	Active	No	Yes	T70	2.25 Miles
27	Active	No	Yes	T68	1.6 Miles

*The survey area for 2024 and 2025 sharp-tailed grouse lek surveys was the Project Area with and extension of two miles outside of the Project Area.

12. How does Minnesota Power intend to enforce and monitor a 25-mph speed limit during the project construction knowing that 3rd party contractors and subcontractors will be required to follow such requirement?

A. Minnesota Power will inform contractors of vehicle speed requirements prior to the start of construction. Minnesota Power will also periodically review contractor vehicle speeds to ensure compliance with these requirements. If a contractor is observed exceeding the speed limit: 1. First Occurrence: Minnesota Power will remind the contractor of the speed requirement. 2. Repeated Non-Compliance: If the issue persists, Minnesota Power may stop work or escalate the matter for review with the contractor's management team.

13. What is the status of all SHPO concurrences?

A. A Class I and Class III Cultural Resources Inventory of the Wind Project has been completed and submitted to the NDSHPO. A response from NDSHPO regarding the

Wind Project's Class I and Class III Cultural Resources Inventory was received on January 15, 2026, that they found the report to be acceptable and is attached hereto as Attachment B.

An Addendum to the Wind Project's Class I and Class III Cultural Resources Inventory was completed to address changes within the Project from the original report. The Class I and III Addendum has been completed and is anticipated to be submitted to the NDSHPO the end of January 2026. The NDSHPO typically responds within 30 days of report submittal.

An Architectural Survey and Viewshed Report for the Wind Project has been completed and will be submitted to the NDSHPO in January 2026.

Copies of all NDSHPO concurrences will be provided to the Commission once received from NDSHPO.

14. Provide a summary table showing the receptor name, participation status, predicted sound level, nearest turbine ID, distance to nearest turbine ID, and predicted shadow flicker.

A. A table providing the receptor ID, Participation status, predicted sound level, predicted shadow flicker, nearest turbine ID, and distance to nearest turbine ID is attached hereto as Attachment F.

Attachments
Attachment A: Revised Table 3.2-1 Avoidance Area
Attachment B: Class I and Class III Cultural Resources Inventory and NDSHPO Correspondence
Attachment C: Noxious Weed Management Plan and Communication
Attachment D: Geotechnical Evaluation
Attachment E: Bat Acoustic Activity Survey
Attachment F: Shadow and Sound Summary Table