



AN ALLETE COMPANY

**Minnesota Power’s Response to NDPSC Staff’s Jan. 6, 2026 Request for Information
Case No. PU-25-305**

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 Corridor of Compatibility and Route Permit Application filed with the North Dakota Public Service Commission (Commission) on December 30, 2025.

The Longspur Wind 230-kV Transmission Line Project (Project) provides the below definitions for reference.

Project Route	In accordance with N.D.C.C. Section 49-22-03(14), “Route” is defined as the location of an electric transmission facility within a designated corridor. The Project Route aligns with the transmission line centerline and is approximately 2.5 miles long.
Project Corridor	The area around the Project Route where easements were acquired (also referred to as the right-of-way). The Project Corridor is the typical easement that will be used during construction and maintained during the life of the Project. The Project Corridor is typically 158- to 510-foot-wide and encompasses approximately 74 acres.
Study Area	The Study Area analyzed for the Project is one-mile wide (0.5 mile on either side of the Project Route) and encompasses approximately 1,990 acres.
survey area	The survey area that the wildlife survey covered.

12. Table 3.1-1 / Table 3.2-1 indicates that archaeological/cultural/ historic resources are not present in the Project Corridor or Route. However, Section 5.4 indicates they are likely 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. No national or state designated or registered historic sites, landmarks, districts, markers, or archaeological sites are present within the Study Area. Table 3.2-1 has been updated and is attached hereto. See Attachment A: Revised Table 3.2-1 Avoidance Area.

13. Do each of the wildlife surveys cover the entire Project Corridor? Please explain if not and the area they do cover.

A. Discussion regarding each of the wildlife surveys is provided below:

- i. The Dakota skipper habitat survey, in accordance with United States Fish and Wildlife Service (USFWS) guidance and survey protocols, included an area that is approximately 15,417 acres and fully covered the Project Corridor.
- ii. The 2024 and 2025 sharp-tailed grouse lek surveys, in accordance with North Dakota Game and Fish Department's (NDGFD) 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 Corridor.
- iii. 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 Corridor.
- iv. The whooping crane habitat assessment, in accordance with communication from USFWS's 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 Corridor.
- v. 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 which did not fully cover the Project Corridor and excluded approximately 5.75 acres within Mercer County.
- vi. 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 and was not performed within the Project Corridor.

- vii. The bat acoustic activity survey, attached hereto as Attachment B, and 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 did not include approximately 9.4 acres within Mercer County.

14. Is Northern long-eared bat likely absent from the Project Corridor and Study Area Application refers to their absence from the "Project area." Please explain.

- A. The northern long-eared bat habitat assessment was focused on areas within the Longspur Wind Project, covering most of the Project Corridor and Study Area. The results of the presence/absence survey and acoustic survey, were that no northern long-eared bats were recorded during the survey effort. In the presence/absence survey, no bats including federally threatened or endangered species captured. In the acoustic survey no federally listed species were identified and five species of Species of State concern may have been identified. Based off the results of the northern long eared bat habitat assessment, presence absence survey, and acoustic survey the northern long-eared bat is likely absent from the Project Corridor.

15. Page 41 of the application indicates that two eagle nests were found in the survey area and that none were in the Project Corridor. Were any in the Study Area of the transmission line?

- A. The 2024 and 2025 eagle nest surveys did not identify any eagle nests within the Project Study Area. The nearest eagle nest is approximately 4.3 miles away from the Study Area.

16. Page 47 indicates that 7,813 acres of native, unbroken grasslands were surveyed in 2025, and of those 2,965 acres were identified as potential Dakota skipper habitat. How many acres were surveyed in the Project Corridor and were identified as potential habitat? What is meant by how 17 patches of suitable habitat resulted in 20.96 acres within the surveyed grasslands? Also, how does this relate to what was in the Project Corridor?

- A. Within the Project Corridor, approximately 13.34 acres were initially identified as potential Dakota skipper habitat during the desktop review. However, field surveys did not confirm any suitable habitat within the Project Corridor itself. The reference to 17 patches of suitable Dakota skipper habitat pertains to the overall survey findings across the broader survey area, not within the Project Corridor. The nearest

confirmed suitable habitat is located approximately 70 feet outside the Study Area boundary.

17. Please confirm no leks are in the Study Area of the transmission line.

- A. The 2024 and 2025 sharp-tailed grouse lek survey did not identify leks within the Study Area; the nearest lek is approximately 2,500 feet west of the Study Area.

18. How many acres of unbroken grassland are within the Project Corridor, and how many acres will be affected by construction?

- A. The Project Corridor contains approximately 13.35 acres of unbroken grassland. Impacts on unbroken grasslands from the Project are anticipated to be negligible. Permanent impacts to unbroken grasslands are estimated to be approximately 0.0036 acres, and temporary impacts are anticipated to be approximately 1.4 acres.

19. 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 to the North Dakota State Historic Preservation Office (NDSHPO) for review on December 22, 2025. NDSHPO completed its review on January 15, 2026. A copy of the Class I and Class III Cultural Resources Inventory and NDSHPO's January 15, 2026 correspondence are attached as Attachment C hereto.

20. 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 to be filed with the NDSHPO in January 2026. The architectural inventory report, once submitted to NDSHPO, will be filed with the North Dakota Public Service Commission.

NDSHPO requested a Class II reconnaissance survey for structures 45 years or older in the visual area of the Longspur wind project. A two mile viewshed buffer of the proposed wind turbine sites was recommended by NDSHPO for the survey. The architectural survey was only conducted for the Longspur Wind Project, however the two mile viewshed buffer did not fully cover the Project Corridor.



AN ALLETE COMPANY

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

- A. Minnesota Power has not yet finalized a Noxious Weed Management Plan with Morton and Mercer Counties. The current draft, recently shared with the Counties, is attached hereto as Attachment D along with records of correspondence with the Counties. An updated plan and records of coordination will be provided prior to construction.

22. File copies of the geotechnical and geophysical analysis that are to be performed when complete.

- A. A geotechnical evaluation was completed for utility line structure locations, the report is attached hereto as Attachment E. No transmission line structure locations will be located within a historic landslide deposit area, as indicated by the North Dakota Geological Survey landslide mapping program.

Attachments

Attachment A: Revised Table 3.2-1 Avoidance Area

Attachment B: Bat Acoustic Activity Survey

Attachment C: Class I and Class III Cultural Resources Inventory Report and NDSHPO Correspondence

Attachment D: Noxious Weed Management Plan and County Communication

Attachment E: Geotechnical Evaluation