

May 6, 2026

Via Electronic Mail & Hand Delivery

Mr. Brian Johnson
North Dakota Public Service Commission
600 E. Boulevard, Dept. 408
Bismarck, ND 58505-0480
ndpsc@nd.gov

In re: Minnesota Power
Longspur Wind Project - Morton County
Siting Application
Case No. PU-25-304

-and-

Minnesota Power
Longspur Wind 230-kV Transmission Line - Morton & Mercer Counties
Siting Application
Case No. PU-25-305
Our File No. 111345-000003

Dear Mr. Johnson:

I am writing on behalf of my client Minnesota Power regarding the above-referenced cases. On May 6, 2026, Minnesota Power filed several prehearing filings with the Commission. Below is a brief summary of the filings to aid the Commission in its understanding of the scope of information that was submitted. Material changes have not occurred to the Projects. Rather, the filings provide the Commission with the most accurate and recent information regarding the Projects.

1. **Pre-filed Witness Testimony Part I – Cheryl Froelich;**
2. **Pre-filed Witness Testimony Part II – Mitchell Bettenhausen;**
3. **Pre-filed Witness Testimony Part III – Alexander Luman;**
4. **Attachment A – Class I and III Cultural Resource Survey Addendum;**
 - a. The additional cultural report submitted in the May 6th filing supplements the prior Class I and III studies and surveys completed for the Projects. The reports continue to conclude that the Projects will avoid impacts to identified resources. The SHPO accepted these findings in correspondence dated April 17th, 2026, located in Attachment A. Longspur’s January 2026 response to Commission

Staff's request for information notified the Commission this addendum was underway and that a copy would be filed with the Commission once finalized. The placement of infrastructure within the Wind Application has not changed.

5. Attachment B – Architectural and Viewshed Report;

- a. The architectural and viewshed report was conducted at the request of SHPO. The report concludes that the Wind Project will not have adverse impacts to historical resources within the Wind Project viewshed given the landscape's existing infrastructure in proximity to the Project. The SHPO accepted the report's findings in correspondence dated April 17th, 2026, located in Attachment B. Longspur's January 2026 response to Commission Staff's request for information notified the Commission this report was underway and that a copy would be filed with the Commission once finalized.

6. Attachment C – Grassland Addendum Memo;

- a. Attachment C updates certain information contained in the Wind Application's Grasslands Survey in Appendix B.11. After the Wind Application was filed, Longspur received additional information from a landowner regarding the status of a 32-acre parcel within the Wind Project. Specifically, the landowner reported the property had a history of cultivation. The Grassland Addendum updates the prior survey to reflect the updated status of the 32-acre parcel that was previously listed as unbroken in response to the additional information received. This information was shared with the Dept. of Ag. (NDDA) and the North Dakota Game and Fish Dept. (NDGF) in March and April 2026 with NDGF confirming receipt of the files on April 16th, 2026. Based on this updated information, the Wind Project does not have infrastructure located within the sharp-tailed grouse buffer area recommended by NDGF's best management practices.

7. Attachment D – Geotech Report;

- a. Attachment D, the Geotech Report, was filed due to changes within the Wind Project, which were captured in the Wind Application, that occurred late in quarter four of 2025. A geotech survey could not be performed in the winter and was conducted as soon as the weather and ground conditions allowed. The length of report is due to the raw data that is contained within this report.

8. Attachment E – Noxious Weed Management Plan;

- a. The Commission historically requests a copy of applicants' weed management plan. Attachment E was submitted in anticipation of the Commission's request for a copy of the same. The Project updated the Weed Management Plan that was filed in Longspur's January response to Staff's request for information. Attachment E contains edits requested from Morton County and records of correspondence from both Mercer and Morton Counties.

9. Attachment F – Updated Wildlife Agency Correspondence;

- a. Attachment F is provided as an update to inform the Commission of the correspondence and engagement that has occurred with NDGF and the NDDA to provide a complete overview of the Project's coordination with these agencies. Longspur met with both agencies as recently as April 30th. Attachment F provides an update regarding this meeting as well as a copy of the Memorandum of Understanding that has been entered into by the Project and the NDDA. Attachment F also provides a list of the various avoidance and

minimization measures Longspur has taken throughout the Project's development and commit to through the life of the Projects. These measures were provided to NDGF in January for comments and edits. After meeting with NDGF on April 30th, the department stated the importance of putting the measures into the docket to ensure compliance with the Project's stated measures.

10. Attachment G – Revised Project Figures;

- a. Attachment G is an update to the Wind Project Boundary. After the notice of hearing was issued by the Commission, a nonparticipating landowner contacted Longspur and requested their nonparticipating parcel be excluded from the Wind Project boundary. Longspur accommodated this landowner's request and removed the parcel from the Wind Project boundary. Attachment G, Figure 12 reflects the updated boundary after this adjustment was made.

11. Attachment H – Residence Survey Memo;

- a. This memo provides a summary of the methodology used by Longspur to identify receptors for its surveying. This information was voluntarily provided for the Commission's general reference.

12. Attachment I – Sound Study (Revised Appendix B3);

- a. The Sound Study was updated to correct the labeling of the participation status of receptors. The results of the original report contained in the Wind Application have not changed.

13. Attachment J – Shadow Flicker Study (Revised Appendix B4);

- a. The Shadow Flicker Study was updated to correct the labeling of the participation status of receptors. The results of the original report contained in the Wind Application have not changed.

14. Attachment K – Sound and Shadow Flicker Summary;

- a. Attachment K is a chart that consolidates the findings of the Sound and Shadow Flicker Studies into one location for ease of reference. This table was provided in the response to a prior request of information received from staff. The table was updated to correct the labeling of the participating status of receptors. The results of the original reports contained in the Wind Application have not changed. A map reflecting these results is provided as Attachment P.

15. Attachment L – Site Plan Detail (Revised Figure 12);

- a. After the notice of hearing was issued by the Commission, a nonparticipating landowner contacted Longspur and requested their parcel be excluded from the Wind Project boundary. Longspur accommodated this landowner's request and removed the parcel from the Wind Project boundary. The revised Wind Application Figure 12 reflects this update and the removal of this parcel. Additionally, Revised Figure 12 reflects the updated change to the grassland status of the 32-acre parcel referenced above.

16. Attachment M – Floodplains Avoidance Area Map;

- a. The Wind Application discusses various areas where Project infrastructure is located in this avoidance area. Attachment M, a Floodplains Avoidance Area Map, reflects the negligible locations where there was no reasonable alternative to the placement of permeant infrastructure in these locations. No change to impacts has occurred from what is stated in the Wind Application.

17. Attachment N – Wetlands Avoidance Area Map;

- a. The Wind Application discusses various areas where Project infrastructure is located in wetland areas. Attachment N, a Wetlands Avoidance Area Map, reflects the negligible locations where there is no reasonable alternative to the placement of infrastructure in these locations. No change to impacts has occurred from what is stated in the Wind Application.

18. Attachment O – Tree Clearing Overview Map;

- a. Attachment O is a Tree Clearing Map that identifies the areas where the Wind Project seeks to clear areas greater than 50 feet in width.

19. Attachment P – Sound and Shadow Flicker Overview Map;

- a. Attachment P is a map of the Wind Project that was provided in response to requests from Commission Staff. Staff had requested the results of the sound and shadow flicker studies be provided in a single map. This map reflects the consolidated information located in the sound and shadow flicker chart that is provided in Attachment K.

20. Attachment Q – Updated T-Line Application Table 3.2-1;

- a. Attachment Q is an updated Transmission Line Application Table 3.2-1 that was intended to update the avoidance area table provided in the Transmission Line Application. The avoidance area table in the Application indicated there are areas of geologic instability in the Transmission Line Corridor. The update in Attachment Q states that areas of geologic instability “may be present” in the Transmission Line Corridor. To further clarify, the update in Attachment Q should have instead stated there are no known areas of geologic instability within the Corridor. Minnesota Power apologizes for the discrepancy in the recent update. The NDGS has no data layers reflecting geologically unstable areas within the Transmission Line Corridor. Additionally, the Transmission Project conducted geotechnical studies of proposed pole locations within the Corridor. The NDGS data and the Project’s geotechnical studies did not identify areas of geologic instability within the Corridor.

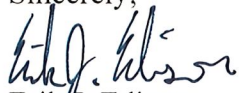
21. Hearing Display Map – T-Line; and

22. Hearing Display Map – Wind Project.

- a. Staff requested certain updates to the Wind Project hearing map submitted on May 6th. Longspur is working to accommodate these requests and will file an updated hearing display map with the Commission consistent with Staff’s requests.

Please feel free to contact me if you have any questions. Thank you.

Sincerely,



Erik J. Edison

EJE/lh
Enc.

cc: ALJ Hope L. Hogan (via email)
Zachary Pelham (via email)
Adam Renfandt (via email)
Jim Klempir (via email)
Alex Luman (via email)
Mitchell Bettenhausen (via email)
Casey Furey (via email)
Wade Mann (via email)
