

Exhibit 14

Brant Johnson Pre-Filed Direct Testimony

**BEFORE THE STATE OF NORTH DAKOTA
PUBLIC SERVICE COMMISSION**

**NORTH PLAINS CONNECTOR LLC
NORTH PLAINS CONNECTOR TRANSMISSION PROJECT
SITING APPLICATION**

CASE NO. PU-26-82

**PRE-FILED TESTIMONY OF BRANT JOHNSON
ON BEHALF OF NORTH PLAINS CONNECTOR LLC**

August 21, 2026

1 **I. INTRODUCTION AND QUALIFICATIONS**

2
3 **Q. Please state your name, employer, and business address.**

4 A. My name is Brant Johnson. I am employed by Grid United LLC ("Grid United") and
5 our business address is 712 Main Street, Suite 2500, Houston, TX 77002.

6
7 **Q. What is your position with Grid United?**

8 A. I am the Senior Vice President of Development.

9
10 **Q. Briefly describe your work history and education.**

11 A. I hold a Juris Doctor and a Bachelor of Science in Zoology and am a licensed attorney
12 in Texas and Montana. The majority of my career has been spent supporting the
13 development of major linear infrastructure, primarily pipelines, and providing legal,
14 environmental, transactional and regulatory support for projects across the United
15 States. Since 2021, I have been with Grid United, leading the development of the
16 North Plains Connector Transmission Project ("North Plains Connector").

17
18 **Q. What is your role with respect to the North Plains Connector?**

19 A. I provide overall strategic leadership for the North Plains Connector, including
20 oversight of project development, permitting, regulatory requirements, and
21 stakeholder coordination.

22
23 **Q. Who is developing the North Plains Connector?**

24 A. The North Plains Connector is being developed by North Plains Connector LLC
25 ("North Plains"). Grid United is the majority investor in North Plains and has led the
26 North Plains Connector development efforts since project inception in 2021, including
27 the engineering and design, land acquisition, survey, stakeholder relations, and
28 permitting efforts. In 2023, Grid United was joined in development efforts by ALLETE,
29 Inc. ("ALLETE"). ALLETE is an energy company with utility operations and direct
30 experience owning and operating high voltage transmission infrastructure, including
31 high voltage direct current ("HVDC") facilities. In 2025, Pattern NPC Transmission

LLC ("Pattern") became a minority investor in North Plains. Pattern is providing execution and construction support for the North Plains Connector.

Q. Please describe the experience with transmission infrastructure development that Grid United, ALLETE, and Pattern bring to development of the North Plains Connector.

A. Grid United's team has several decades of experience developing, financing, and advancing large-scale transmission and linear infrastructure projects across the United States. Grid United's development expertise is complemented by ALLETE's HVDC ownership and operation experience and Pattern's recent experience with HVDC construction and execution.

Q. What proposed hearing exhibits are you sponsoring in your testimony?

A. I am sponsoring the following proposed hearing exhibits:

- Exhibit 1: Consolidated Certificate of Corridor Compatibility and Route Permit Application ("Consolidated Application");
- Exhibit 2: North Plains Connector Overview Map;
- Exhibit 3: Local Zoning Approvals;
- Exhibit 4: Route and Corridor Adjustment Map;
- Exhibit 5: Water Resource/Management District Correspondence;
- Exhibit 6: County Weed Board Approval Correspondence;
- Exhibit 7: Certification Relating to Order Provisions;
- Exhibit 8: Letters of Support;
- Exhibit 14: Brant Johnson Pre-Filed Direct Testimony
- Exhibit 14-A: Brant Johnson Curriculum Vitae; and
- Exhibit 16: Public Hearing Presentation.

Q. What is the purpose of your Direct Testimony?

A. The purpose of my testimony is to provide an overview of the North Plains Connector, including the development history, purpose, benefits, and potential project investors. For the North Dakota portion of the North Plains Connector ("Project"), which is the

subject of North Plains' Consolidated Application, I discuss the factors used to select the proposed Project Corridor and Route, including North Plains' stakeholder engagement, land rights acquisition, local permitting efforts, and existing land use and infrastructure coordination. I also provide an overview of the Project's design, construction plans, and future operations and maintenance, including measures taken to avoid and/or minimize potential human and environmental impacts during each phase of the Project.

II. OVERVIEW OF THE NORTH PLAINS CONNECTOR

Q. Please provide a high-level description of the North Plains Connector.

A. The North Plains Connector is a bidirectional HVDC electric transmission line system and associated facilities that will extend approximately 422 miles between a point near Colstrip, Montana to two separate points in North Dakota—one near the town of Center in Oliver County and the other near St. Anthony in Morton County. The North Plains Connector is designed to move electricity east or west between the Eastern and Western Interconnections (also referred to as the eastern grid and western grid, respectively), which are the two largest electrical grids in North America. Specifically, North Plains Connector will connect the Western Electricity Coordinating Council ("WECC") electrical power markets in the Western Interconnection with the Midcontinent Independent System Operator ("MISO") and Southwest Power Pool ("SPP") systems in the Eastern Interconnection.

Q. Does proposed Exhibit 2 provide a visual overview of the North Plains Connector?

A. Yes.

Q. Why did North Plains select the identified endpoints for the North Plains Connector?

A. The North Plains Connector originated with the goal of connecting the WECC in the Western Interconnection and SPP and MISO in the Eastern Interconnection to bolster

the reliability and resiliency of both regions. In order to identify the best options to make these connections, North Plains began conducting engineering analyses and transmission line studies in 2021. North Plains continued these studies over the next two years and also engaged in discussions with various regional utilities and Regional Transmission Organizations (“RTOs”). In addition to the technical analysis, North Plains conducted desktop routing studies to identify potentially viable routing options, and these processes ultimately led to the identified interconnection points at the planned East Oliver Substation in Oliver County (connecting to MISO), the proposed Morton County Switchyard in Morton County (connecting to SPP), and the existing Colstrip Substation in Montana (connecting to WECC).

Q. From an electrical grid standpoint, what are the benefits of the North Plains Connector?

A. This high-capacity, bidirectional line is intended to: (1) improve reliability and efficiency for both interconnections by increasing transfer capacity and access to additional generation between markets; (2) improve resiliency through bi-directional power flow control, along with dynamic voltage and frequency support, to help maintain grid stability and operational flexibility; and (3) mitigate weather-driven system outages by providing a path to quickly and efficiently shift power to where it is needed most.

Q. How will the North Plains Connector benefit North Dakota?

A. The North Plains Connector offers North Dakota a unique opportunity to meet growing energy needs, strengthen the electric grid, provide interregional connections for more connectivity during grid-impacting events, and expand markets for the state’s energy producers.

Q. Has North Plains submitted interconnection requests for the North Plains Connector? If so, what is the current status of the requests?

A. Yes, interconnection requests have been submitted for the North Plains Connector, and the status of each request is as follows:

- 125 • MISO: North Plains submitted two Merchant HVDC Transmission Connection
126 Requests to MISO with a planned interconnection at the East Oliver Substation.
127 The request to study the North Plains Connector's export capacity was submitted
128 on June 27, 2023, and the request to study the North Plains Connector's import
129 capability was submitted on December 12, 2025.
- 130 • SPP: North Plains submitted a Feasibility Study to the SPP Transmission Working
131 Group ("TWG"), which accepted the results of the study in August 2023. The
132 Planning Study Scope was approved in February 2024 and completed and
133 endorsed by the TWG on May 27, 2025. North Plains, SPP, and Basin Electric
134 Power Cooperative ("Basin Electric") executed the SPP Interconnection
135 Agreement on August 6, 2026.
- 136 • WECC: North Plains submitted a Transmission-to-Transmission Interconnection
137 Request to NorthWestern Energy for interconnection to the Colstrip Transmission
138 System ("CTS") on August 18, 2021, with the planned point of interconnection at
139 the existing Colstrip 500-kV Substation in Rosebud County, Montana. A System
140 Impact Study evaluating the proposed 3,000-MW, bi-directional HVDC
141 interconnection was completed in August 2023. North Plains is currently
142 negotiating a Transmission Interconnection Agreement with the CTS owners, with
143 execution targeted in 2026.

144
145 **Q. What are the next steps in the interconnection processes?**

- 146 A. For the MISO interconnection process, the next steps are completion of the required
147 system impact and facilities studies, followed by negotiation and execution of an
148 Interconnection Agreement. North Plains anticipates the Interconnection Agreement
149 will be executed by the end of 2026 or first quarter of 2027.

150
151 For the SPP interconnection process, since the Interconnection Agreement has been
152 executed, the next step in the process is for North Plains to complete the SPP Design
153 Study.

For the CTS interconnection process, the next step is to execute the Interconnection Agreement.

Q. Please discuss the potential Project investors and their potential ownership in North Plains Connector.

A. Each of the following entities has signed a non-binding memorandum of understanding ("MOU") with North Plains and may acquire either an ownership interest or transmission capacity in North Plains Connector: Avista Corporation, BHE U.S. Transmission, Minnkota Power Cooperative, Montana-Dakota Utilities Company, Great River Energy, NorthWestern Energy, Portland General Electric, and Puget Sound Energy. ALLETE has also signed definitive agreements for the ability to acquire ownership and capacity in the North Plains Connector and is expected to be the project operator.

Q. Will the right to use the North Plains Connector's capacity be tied to ownership?

A. Yes. Although the potential owners of capacity will hold firm transmission rights covering the full 3,000 MW capacity of the line, that does not foreclose use by other entities. Consistent with FERC's merchant transmission requirements, North Plains will create tradable firm transmission rights and maintain or oversee an OASIS service through which firm transmission rights holders may resell or reassign capacity to other eligible entities on the secondary market. In addition, transmission capacity that is not being scheduled by firm transmission rights holders at a given time will be available to other entities as non-firm, short-term transmission service under the applicable Open Access Transmission Tariff ("OATT") on a non-discriminatory basis.

Q. When does North Plains anticipate finalizing the commercial agreements with potential investors?

A. North Plains anticipates finalizing commercial agreements with potential investors before the start of construction.

Q. Besides the potential investors identified above, will other entities have the ability to utilize the North Plains Connector's transmission capacity?

A. Yes. Entities other than the potential investors will be able to apply for transmission capacity rights through the same FERC-regulated process as the potential investors, consistent with the FERC's merchant transmission policies. Any eligible entity—including non-owners—may participate in that process and obtain transmission service on a non-discriminatory basis.

Q. What is the current anticipated schedule for the construction and in-service of the North Plains Connector?

A. North Plains anticipates starting construction in 2027 and completing construction by the end of 2031, with the North Plains Connector placed in service by the end of 2032. Additional details regarding the development schedule are provided in Table 1.9-1 of the Consolidated Application.

Q. What is the estimated total cost of the Project?

A. The estimated total cost of the Project (North Dakota portion only) is approximately \$3.2 billion.

III. APPROACH TO ROUTE DEVELOPMENT

Q. Please discuss the approach North Plains took to identifying a proposed Route for the Project.

A. North Plains implemented a multi-step process over the last five years to select the proposed Project Route:

- In 2021, North Plains began conducting desktop routing studies to identify potentially viable preliminary routes between the potential endpoints using routing analysis software. The goal was to identify preliminary routes that complied with applicable regulatory requirements, including avoiding and/or minimizing potential human and environmental impacts, while maximizing co-location opportunities and minimizing routing constraints. As more information

was gathered, North Plains adjusted the initial software route analysis to address more detailed environmental resource considerations and engineering constraints.

- North Plains prioritized the input of landowners, agencies, and Tribal representatives. To implement this stakeholder-first approach, North Plains presented the preliminary desktop routes to landowners, local officials, agencies, and Tribal representatives in 2022 to obtain feedback. Based on the input received, North Plains made routing adjustments and began securing survey permission from landowners and state and federal agencies (where applicable) to conduct environmental and cultural field surveys. North Plains also continued to analyze and further define the potential locations for the converter station and the MISO and SPP interconnection points.
- The next phase of the routing process involved North Plains engaging with landowners individually to gather property-specific information, identify potential concerns, and attempt to align route selection with landowner input to the extent possible. North Plains also incorporated field survey results, as well as continued feedback from agencies and other stakeholders, to further refine the route. This iterative routing process required close coordination with landowners, local officials, agencies, Tribes, and other stakeholders, and resulted in multiple years of survey effort and consultation.
- Throughout route development, North Plains also held multiple public engagement events and open houses accessible to residents and landowners near the Project. These engagement opportunities played a crucial role in promoting transparency, fostering dialogue, and incorporating public input into the decision-making process. A list of the stakeholder engagement events conducted by North Plains in North Dakota as of the time of filing the application is provided in Table 7.2.21-1 of the Consolidated Application. North Plains held additional landowner meetings in August 2026.

Q. How did North Plains incorporate landowner feedback into Route selection?

A. As discussed above, North Plains engaged in one-on-one coordination with individual landowners, as well as coordinating with a larger landowner group that formed. North Plains also established a system to review landowner routing requests. When a request was made, the request was reviewed by environmental, engineering, and the land rights team. Factors considered included compliance with siting criteria and agency recommendations, constructability, and impact on other landowners. Where this analysis indicated route adjustments were feasible, they were generally incorporated into the proposed Route.

Q. What is the current status of land acquisition for the Project?

A. Currently, 99 percent of private landowners in North Dakota have entered into options for easements, and North Plains has also secured an option to purchase the proposed converter station site in Morton County. We are in the process of finalizing the option agreement for two parcels of land owned by the same family in Oliver County, at which point 100 percent of the private landowners in North Dakota will have signed options for easements. Acquisition of easement rights across Federal and State lands will be completed following completion of the Federal and North Dakota Public Service Commission ("PSC") permitting processes.

IV. LOCAL COORDINATION AND PERMITTING

Q. Please discuss North Plains' engagement with local officials regarding the Project.

A. North Plains has engaged with local officials throughout Project development. North Plains regularly presented at county planning and zoning and board of county commissioners' meetings on the status of Project routing and design, including providing preliminary route maps. North Plains has also coordinated with local officials on local permitting, road use agreements, and the noxious weed management plan.

Q. At the time of filing the Consolidated Application, what local zoning approvals had North Plains received for the Project?

A. North Plains was granted local approvals from Golden Valley, Slope, Hettinger, and Grant Counties and Havelock Township as of the date of filing the Consolidated Application. A summary of the approvals received is provided in Table 7.1.17-1, and copies of the approvals are provided in Appendix E of the Consolidated Application.

Q. Since filing the Consolidated Application, has North Plains received additional local zoning approvals?

A. Yes. North Plains was granted a Conditional Use Permit from Oliver County for the Oliver Transmission Line on February 10, 2026 and was granted a Special Use Permit, variance, subdivision approval, and zoning change approval from Morton County for the converter station site on June 23, 2026.

Q. Are copies of the Oliver County and Morton County approvals provided as proposed Exhibit 3?

A. Yes.

Q. With these approvals, has North Plains obtained all local zoning permits required for the Project?

A. Closer to starting construction, North Plains will obtain building permits, as needed, and a floodplain permit approval from Morton County. All other local zoning approvals required for the Project have been obtained.

Q. Will North Plains enter into road use agreements for the Project?

A. Yes. North Plains has developed a draft road use agreement, which was shared with the counties and Havelock Township as an appendix of the Conditional Use Permit and Special Use Permit applications. North Plains will continue to coordinate with counties and townships, as applicable, to finalize the road use agreements prior to utilizing haul roads for Project construction.

V. PROJECT CORRIDOR AND ROUTE

Q. Focusing on North Dakota, do the figures in Appendix A to the Consolidated Application show the proposed Route and Corridor for the Project as of the date of filing the Consolidated Application?

A. Yes.

Q. Since filing the Consolidated Application, have there been any adjustments to the proposed Route and Corridor?

A. Yes. In Oliver County, a segment of the route was adjusted based on input from the Oliver County Water Resource District and the Morton County Water Management District for Square Butte 5 Dam, also known as Schwalbe Dam and Hatzenbihler Dam. The route was shifted to the northeast to avoid the spillway and flood control area for the dam.

Additionally, in Morton County, a segment of the route was adjusted based on engineering design for the converter station. The route was shifted to enter the converter station from the west instead of the north.

Q. Does proposed Exhibit 4 show both the original proposed Route and Corridor and the modified proposed Route and Corridor with the two adjustments?

A. Yes.

Q. Are any new landowners affected as a result of the Route and Corridor modifications?

A. No. The modified Route and Corridor cross parcels that were already crossed by the Project, and the landowners have agreed to the adjustments.

Q. What will be provided as proposed Exhibit 5?

A. North Plains reached out to the Oliver County Water Resource District and the Morton County Water Management District to confirm the reroute addresses their concerns. Once we have received that confirmation, we will provide the correspondence as proposed Exhibit 5.

Q. Are there any other adjustments to the proposed Route and Corridor?

A. Three additional adjustments are in process. Two are in Morton County to avoid placement of structures within section line rights-of-way. The third is in Oliver County to avoid a cultural resource/Tribal resource. These route adjustments have not yet been finalized, but the adjustments will be filed with the PSC once finalized.

Q. Are the sections, townships, and ranges crossed by the Project's proposed Route and Corridor, with the modifications, identified in Table 1.7-1 in the Consolidated Application?

A. Yes. Although the table header references the Study Area, Table 1.7-1 provides legal descriptions for the proposed Project Corridor, rather than the Study Area.

Q. Please describe the proposed Project Corridor.

A. The Project Corridor includes the Project Route, right-of-way, and full construction easements for the Morton County Converter Station and fiber repeater stations, along with areas surveyed for cultural and natural resources. The Project Corridor typically ranges from 300 to 682 feet in width along the Project Route; however, at the Morton County Converter Station and Morton County Switchyard, the Corridor is wider with a maximum width of 2,078 feet. The additional surveyed area allows for flexibility to address minor adjustments to the Project Route that may arise during construction.

Q. Please describe the proposed Project Route.

A. The Project Route is located within the Project Corridor and was designed to parallel existing linear features such as existing transmission lines, section lines, quarter section lines, roadways, and field edges to the greatest extent possible. The Project Route consists of three segments: HVDC Transmission Line, Oliver Transmission Line, and Morton Transmission Line.

Q. Were alternative routes considered for the Project? If so, please discuss the alternative routes considered.

A. As discussed above, North Plains evaluated multiple route iterations in developing the proposed Route. Much of the initial baseline route identified in 2022 underwent minor adjustments based on landowner, agency, and other stakeholder input; environmental survey results; and engineering constraints identified after more detailed review.

Q. What are the anticipated right-of-way widths of the HVDC Transmission Line, the Oliver Transmission Line, and the Morton Transmission Line?

A. The right-of-way width for the HVDC Transmission Line is typically approximately 200 feet, with the fiber repeater stations located within the right-of-way. The Oliver and Morton Transmission Line rights-of-way are typically approximately 200 feet wide, except where co-located for about 3.4 miles in Morton County. Where the Oliver and Morton Transmission Line segments are co-located, the right-of-way is 150 to 250 feet wide for each segment, for a total width of 300 to 500 feet.

Q. Will any permanent access roads be required for the Project?

A. Yes. Table 4.3-1 of the Consolidated Application presents the estimated lengths, in miles, associated with access roads for each transmission line segment.

Q. Is all permanent infrastructure, including permanent access roads, located within the proposed Corridor?

A. Yes.

Q. Where is the proposed converter station site located?

A. The Morton County Converter Station will be located in the North 1905.50 feet of the Southwest Quarter of Section 2, Township 135 North, Range 84 West, Morton County. This is approximately five miles north of Flasher.

Q. What is the length of the proposed Route for the HVDC Transmission Line, the Oliver Transmission Line, and the Morton Transmission Line?

A. The North Dakota portion of the HVDC Transmission Line is 168-miles-long, the Oliver Transmission Line is 52-miles-long, and the Morton Transmission Line is 22-miles-

long. Table 1.7.1-1 of the Consolidated Application provides the length of the Project Route for each transmission line segment by county.

VI. PROJECT DESIGN

Q. Are the preliminary design characteristics for the HVDC Transmission Line, the Oliver Transmission Line, and the Morton Transmission Line provided in Table 4.1.1-1 of the Consolidated Application?

A. Yes.

Q. Please describe the transmission structures North Plains anticipates using for the Project.

A. Three main structure types are proposed for use on the transmission lines: tangent structures, angle structures, and dead-end structures. Tangent structures will be used in straight-line segments, or with small transmission line angles typically less than two degrees. Tangent structures are the most common type of structure and will make up most of the structures. Where there is a change of direction in the Project Route of more than two degrees, an angle structure will typically be used. Angle structures are like tangent structures, except the foundations may be deeper and wider to accommodate multidirectional, non-offsetting loads. Dead-end structures will be required at transmission line termination points, as well as for long spans or sharp angle turns. Dead-end structures may also be necessary due to specific constraints or terrain features. Dead-end structures support significantly larger loads than standard tangent and angle structures.

For most areas, North Plains anticipates that tubular steel structures will be used. However, North Plains may use steel lattice or two-pole structures in particular situations, such as locations requiring longer spans, where the alignment changes direction by a substantial degree, or locations with difficult access for construction.

Figures showing preliminary structure typicals are provided in Appendix H-1 of the Consolidated Application.

Q. Are the anticipated foundation installation specifications by structure type provided in the Consolidated Application?

A. Yes, the foundation installation specifications by structure type and transmission line segment are provided in Table 4.1.3-1 of the Consolidated Application.

Q. Are the conductors that will be installed described in Section 4.1.4 of the Consolidated Application?

A. Yes.

Q. What are fiber repeater stations?

A. North Plains will install optical power ground wire ("OPGW") on the Project, which will serve two purposes: the conductive part of the OPGW will be grounded to protect the lines against lightning strikes; and the optical fiber part of the OPGW will have fiber optic cables used for Project communications. The optical data signal transmitted by the OPGW will degrade with distance. Given its length, the HVDC Transmission Line requires fiber repeater stations to prevent signal loss.

Q. At this time, do you know where the fiber repeater stations will be located along the HVDC Transmission Line?

A. No. During detailed engineering, North Plains will perform fiber loss calculations to determine the exact location of fiber repeater stations. Currently, the maximum distance between fiber repeater stations is estimated to be around 80 miles. As a result, the HVDC Transmission Line may include two fiber repeater stations in North Dakota.

Q. What is the purpose of the converter stations?

A. The converter stations are where the DC and AC transmission segments connect and electricity is converted from AC to DC and vice versa. The converter stations are

located on each end of the HVDC line and enable bidirectional power flow between the Eastern and Western Interconnections. In North Dakota, the Morton County Converter Station will connect the HVDC Transmission Line to the Oliver Transmission Line and the Morton Transmission Line.

Q. Is detailed information regarding the facilities that will be constructed at the Morton County Converter Station site provided in the Consolidated Application?

A. Yes. The components are described in Section 4.1.5 of the Consolidated Application, and a preliminary site plan showing the proposed location of the components on the site is provided in Appendix H-2 of the Consolidated Application.

Q. What facilities will be constructed to interconnect the Morton Transmission Line to the SPP system, and who will construct and own those facilities?

A. Basin Electric will construct and own the switchyard (referred to as the Morton County Switchyard in the Consolidated Application) to interconnect the Morton Transmission Line to the SPP system. The Morton County Switchyard will be located approximately 12 miles southeast of St. Anthony.

Q. Please discuss what facilities will be constructed to interconnect the Oliver Transmission Line to the MISO system, including who will construct and own those facilities.

A. The Oliver Transmission Line will interconnect to the MISO system via Minnesota Power's planned East Oliver Substation. The East Oliver Substation is being constructed as part of Minnesota Power's HVDC Modernization Project, which was approved by the Commission on June 4, 2025 (Case No. PU-24-381). The East Oliver Substation will be located approximately six miles southeast of Center.

Q. Please describe the temporary workspaces needed to construct the Project.

A. The Project will require temporary workspaces to access the construction site, access structure locations, stage equipment and materials, splice wires and conductor lines,

and install the various Project components. Figure 4.2-1 in the Consolidated Application shows in more detail the typical workspaces anticipated for the Project.

Q. Please describe the access roads required for the Project.

A. North Plains anticipates using the following types of access roads for the Project:

- Existing access road – no improvement needed for Project use;
- Existing access road – improvement needed prior to Project use;
- Overland travel – typically used for access to structures where no road currently exists, but a road does not need to be constructed for Project use;
- New temporary access roads – construction of a temporary road for Project construction;
- New permanent access road – construction of a new permanent access road where no road exists to enable both construction and operational access; and
- Turnarounds – additional temporary space along some access roads to allow vehicles to turn around or to allow bi-directional travel.

Overland travel and temporary access roads/turnarounds will be reclaimed and revegetated once construction is complete, although cut and fill contours and waterbody crossings may be retained to enable future safe overland travel during Project operation. The lengths and types of access roads by transmission line and county are provided in Table 4.3-1 of the Consolidated Application.

Q. Will any temporary workspaces or access roads be located outside of the proposed Corridor?

A. While most construction activities will be confined to the Corridor, North Plains will need to use areas outside of the Corridor for temporary construction workspace and construction access. Such areas may include contractor laydown yards, wire pulling and tensioning areas, and temporary access roads (including overland travel). Where temporary workspace or construction access outside of the Project Corridor are required, North Plains will secure an agreement with the landowner (to the extent not

covered by an existing agreement), conduct required field surveys, and obtain necessary permits prior to use.

VII. SETBACKS

Q. Are the setbacks applicable to the Project listed in Table 4.6-1 of the Consolidated Application?

A. Yes.

Q. Will the Project comply with all applicable setback requirements?

A. Yes.

Q. For purposes of the PSC's 500-foot setback from residences, schools, and places of business, what steps did North Plains take to identify residences, schools, and places of business in proximity to the proposed Corridor and Route?

A. North Plains conducted a desktop review and field survey review of occupied residences, potentially occupied residences, schools, businesses, and other structures intended for habitation within the Study Area.

Q. Are the residences, schools and places of business within the Study Area identified on Figure A-4 in Appendix A of the Consolidated Application?

A. Yes.

Q. Are any occupied residences, schools or places of business located within 500 feet of the Project right-of-way?

A. Yes, in one location. Per the owner's request, the Route was located within 500 feet of a potential residence, which is a hunting cabin used seasonally by the owner. The owner executed a waiver of the avoidance area requirement.

Q. Is a copy of the executed 500-foot avoidance area setback waiver provided in Appendix F to the Consolidated Application?

A. Yes.

VIII.EXISTING LAND USE AND INFRASTRUCTURE

Q. What are the primary land uses within the Project Corridor and Route?

A. The Project Corridor and Route extend through rural agricultural areas of North Dakota, and most of the Project Corridor (approximately 86 percent) is either grassland/herbaceous or cultivated crops. Table 6.7.1-1 of the Consolidated Application provides a summary of existing land cover within the Project Corridor and Study Area, and land cover within the Study Area is also shown on Figure A-5 in Appendix A of the Consolidated Application.

Q. Is the Project anticipated to negatively impact communications systems?

A. No. The Project is not expected to interfere with Federal Communications Commission-licensed communication services. The Project will be designed to operate within industry standard limits with respect to radio and television interference, and North Plains will monitor and address any impacts, should they arise. Telephone and fiber optic services are not anticipated to be impacted by Project construction or operation.

Q. Did the Project consider public and private airports/airstrips in selecting the Corridor and Route?

A. Yes. North Plains conducted a review of aviation facilities within and beyond the Study Area, using the Federal Aviation Administration ("FAA") database along with landowner input, aerial reviews, and other online sources. North Plains did not identify any airports registered with the FAA within 20,000 feet of the Project Route or heliports located within 5,000 feet of the Project Route.

North Plains identified two private airstrips within 10,000 feet of the Project Route, one in Morton County and the other in Hettinger County. Based on the distance between the Project and the private airstrips, no impact is anticipated.

Q. Were the Project's potential impacts to transportation, such as railroads and roads, considered by North Plains? If so, how so?

A. Yes. The Project is designed to comply with applicable setbacks. Additionally, North Plains has been and will continue to coordinate with counties, townships, and railroad companies where the Project crosses roads or railroads. North Plains will also execute road use agreements with counties and townships (as needed), will obtain all required road-related permits, and is in the process of obtaining crossing agreements with railroad companies.

North Plains has developed a Traffic and Transportation Management Plan, included as Attachment K to the draft Construction, Mitigation, and Reclamation Plan ("CMRP") (see Appendix G of the Consolidated Application). This plan outlines the strategies that North Plains will implement throughout Project construction to avoid or minimize impacts to traffic and transportation resulting from construction-related activities.

Q. Are any oil or gas wells, or mining resources located within the Project Corridor or Route?

A. No active oil or gas wells or active mining operations are located within the Project Corridor or crossed by the Project Route.

Q. What sound is anticipated to be generated by Project construction, and how will North Plains minimize potential impacts?

A. Construction activities will be performed with standard heavy equipment, which will temporarily increase sound levels within the Project workspace. To minimize the effects of construction noise at nearby noise sensitive areas, North Plains will limit construction to daytime hours to the extent practicable, maintain construction equipment in good working order, and use mufflers for equipment exhaust.

Q. What sound is anticipated to be generated by Project operations, and how will North Plains minimize potential impacts?

A. During operations, sound produced by the transmission lines is anticipated to be minimal and barely distinguishable from background sounds.

For the Morton County Converter Station, North Plains has minimized potential sound impacts through site selection and design. The site is in a rural area of the county, with the closest residence approximately 0.59 miles away from the Project. The installation of fire walls and the placement of sound-producing equipment, such as cooling fans, toward the center of the converter station will minimize sound propagation.

Utilizing proprietary manufacturer data from a similar project of similar design, North Plains prepared preliminary sound contour estimates for the preliminary Morton County Converter Station design under the most severe operating conditions. At the closest residence, sound was estimated at 43.6 dBA, based on conservative assumptions, including: no attenuation (sound reduction) from existing objects or proposed structures (e.g., the switchyard or related structures); and flat terrain, although elevation changes would be expected to reduce sound propagation.

North Plains has also set a design limitation to ensure the final sound outputs align with preliminary estimates. Specifically, North Plains has established an operational audible sound limit of 65 dBA at the site's closest parcel boundary line (directly north), which covers all equipment within the converter station. This limitation is part of the technical specifications that must be met by the converter station designer and supplier ("Contractor"). Before construction, the Contractor must provide a detailed report, including sound modeling and audible sound propagation parameters, demonstrating that the final design will comply with this requirement. After construction, the Contractor must conduct field verification measurements to confirm the accuracy of the study, modeling, and to demonstrate compliance with the audible

644 sound requirement. If compliance is not demonstrated either before or after
645 construction, the Contractor must take the actions necessary to meet the specified
646 limit.

647
648 **Q. Please discuss electric and magnetic fields (“EMF”) and how they relate to the**
649 **Project.**

650 A. EMF refers to two separate fields: electric fields and magnetic fields. Electric fields
651 arise from the voltage or electrical charges, and magnetic fields arise from the flow of
652 electricity or current that travels along transmission lines, power collection (feeder)
653 lines, substation transformers, house wiring, and electrical appliances.

654
655 **Q. Are any adverse impacts anticipated from EMF?**

656 A. No. As discussed in more detail in Sections 6.3.1.5 and 6.3.2.5 of the Consolidated
657 Application, independent research conducted to date does not indicate any
658 detrimental health effects from EMF.

659
660 **Q. What steps has North Plains taken or will North Plains take to minimize potential**
661 **visual effects from the Project?**

662 A. North Plains routed the Project to avoid recreational and urban areas, and to parallel
663 existing linear features to the extent possible. Additional measures North Plains will
664 use to minimize potential visual impacts include: minimizing tree clearing where
665 possible by using only the necessary right-of-way width to safely construct and
666 operate the Project, using perpendicular crossings of roadways where possible,
667 setting back poles as far as possible from roadway crossings, and utilizing a color of
668 pole that will best blend into the landscape. At the Morton County Converter Station,
669 valve halls will be painted to blend the structures into the natural landscape and
670 backgrounds, and North Plains will use shielded and downward-facing lights focused
671 on areas necessary for safety, security, and operations.

Q. Will the Project participate in the North Dakota One-Call program prior to construction to identify existing utilities and coordinate with facility owners to minimize potential impacts to existing infrastructure?

A. Yes.

IX. PROJECT CONSTRUCTION

Q. Discuss the personnel that will be involved in the construction of the Project.

A. North Plains will select qualified engineering, procurement, and construction ("EPC") contractors to manage construction activities. North Plains estimates a peak construction workforce of approximately 500 workers in North Dakota. This includes an estimated 250 workers at the Morton County Converter Station site and the remaining workers composing various construction crews along the transmission lines in North Dakota. Workforce distribution will be dependent on the construction phase of each segment of the line. As mentioned earlier, Pattern will provide execution and construction support as a joint developer of the North Plains Connector.

Q. Please provide an overview of the sequence of Project construction for the transmission lines.

A. Figure 5.1-1 in the Consolidated Application depicts the typical sequence of transmission line construction. Construction would begin with mobilization and preparation of contractor yards, followed by surveying and staking to establish the approved alignment and workspace limits. Access roads and overland travel routes would then be developed, vegetation cleared as necessary, and erosion and sediment control best management practices installed before foundation installation and structure setting occur. Once structures are in place, ground rods or counterpoise would be installed, followed by installation of conductors and optical ground wire, wire stringing, and clipping. Construction would conclude with site cleanup and reclamation to restore temporary work areas in accordance with applicable requirements.

Q. How long is construction of the Project transmission lines anticipated to take?

A. Construction of the Project is expected to take approximately 3 to 4 years.

Q. Please discuss the anticipated timing and sequence of construction for the Project's converter station site.

A. Similar to the transmission line construction, converter station site construction would begin with surveying and staking, followed by site preparation activities including vegetation clearing, grading, and construction of access roads. The next step would be installation of foundations and oil containment structures, as required. North Plains will then install underground electrical raceways and copper ground grid, followed by steel structure and area lighting, the converter valve hall and ancillary buildings, and the high-voltage equipment. Finally, crushed rock will be spread on site and security fencing will be installed. After construction is completed, North Plains will remove and dispose of debris and unused materials from the site and will restore disturbed areas within the temporary workspace.

Q. Has North Plains developed measures to minimize potential impacts during Project construction? If so, please explain.

A. Yes. North Plains has developed a draft CMRP, which is provided in Appendix G of the Consolidated Application.

Q. Please discuss the purpose of the draft CMRP in more detail.

A. North Plains developed the draft CMRP to describe the construction procedures and other avoidance/minimization measures that North Plains will implement during construction to reduce potential impacts related to the Project. The CMRP also describes the restoration and reclamation process that North Plains will implement when construction is complete. Appendices of the CMRP include Project-specific plans for certain activities and resources. For example, the plans include an Agricultural Impact Mitigation Plan, a Fire Prevention and Suppression Plan, a Noxious Weed Management Plan, a Migratory Bird Treaty Act Compliance Plan, and

a Spill Prevention and Response Plan. See Appendix G to the Consolidated Application for more detailed information.

Q. Have county weed boards approved the Noxious Weed Management Plan for North Dakota?

A. At the time the Consolidated Application was filed, all counties except for Oliver County had approved a draft of the Noxious Weed Management Plan. Since the Consolidated Application was filed, an updated version of the plan was submitted to and approved by all of the North Dakota counties crossed by the Project. Copies of correspondence received to date confirming approval are provided as proposed Exhibit 6, and additional correspondence (from Oliver County) will be provided once received.

Q. Will North Plains develop an emergency response plan for the Project?

A. Yes, North Plains will develop an emergency response plan prior to beginning Project construction.

X. PROJECT OPERATION AND MAINTENANCE

Q. Discuss the personnel that will be involved in the operation and maintenance of the Project.

A. ALLETE, as the anticipated operator of the Project, anticipates two to four full-time equivalent jobs for the operation of the Project facilities. The Project will contract or direct hire line crews to maintain the transmission lines. The line crew will be sourced from the local lineman labor pool as available.

Q. Will there be routine, scheduled inspections of the Project to ensure it is operating appropriately?

A. Yes.

Q. How will the Project be monitored between inspections?

A. The Project will be equipped with a Supervisory Control and Data Acquisition ("SCADA") system. The SCADA system is a computer system for gathering and analyzing real-time data, which is used to monitor and control the transmission line's performance.

Q. Will the Project be designed, constructed, and operated in compliance with all applicable federal, state, and local regulations?

A. Yes.

XI. CERTIFICATION RELATING TO ORDER PROVISIONS

Q. Has North Plains provided a signed Certification Relating to Order Provisions for Transmission Facility Siting, with accompanying Tree and Shrub Mitigation Specifications ("Certification")?

A. Yes.

Q. Is the executed Certification provided as proposed Exhibit 7?

A. Yes.

Q. Who executed the Certification on behalf of North Plains?

A. Michael Skelly executed the Certification.

Q. Does Michael Skelly have authority to bind North Plains with respect to the commitments made in the Certification?

A. Yes.

Q. With respect to tree and shrub clearing, is North Plains requesting the ability to clear an area wider than 50 feet in some locations within the Project Area?

A. Yes. North Plains requests clearance of up to 250 feet in width within the Project workspace to accommodate construction, access, and structure placement, and within the right-of-way to accommodate Project operation.

796

797 **Q. With the exception of this requested modification, will North Plains comply with**
798 **the PSC's Tree and Shrub Mitigation Specifications?**

799 A. Yes.

800

801 **XII. STAKEHOLDER SUPPORT**

802

803 **Q. Has North Plains received letters of support for the Project?**

804 A. Yes. North Plains received letters of support from the North Dakota Transmission
805 Authority located in Appendix J-11, five Tribal Historic Preservation Officers ("THPOs")
806 for MHA Nation, Sisseton Wahpeton Oyate, Spirit Lake Tribe, Standing Rock Nation,
807 and the Turtle Mountain Band of Chippewa Indians located in Appendix J-14, and
808 Montana-Dakota Utilities located in Appendix J-15 of the Consolidated Application.

809

810 **Q. Since filing the Consolidated Application, has North Plains received additional**
811 **letters of support?**

812 A. Yes. North Plains has received letters of support from ALLETE and Minnkota Power
813 Cooperative.

814

815 **Q. Are copies of those letters provided in proposed Exhibit 8?**

816 A. Yes.

817

818 **Q. In addition to the broader benefits of the North Plains Connector, has North**
819 **Plains provided any other local benefits?**

820 A. Through its relationship with the North Dakota Community Foundation, North Plains
821 launched the Community Investment Program. Since its inception in 2023, North
822 Plains has committed \$3.85 million to the Community Investment Program. Thus far,
823 the Community Investment Program has awarded grants to over 100 organizations in
824 counties crossed by the Project, totaling approximately \$2 million. Award decisions
825 are made by a community advisory committee from each county, composed of
826 residents and local leaders. Additionally, North Plains has engaged with Bismarck

State College and United Tribes Technical College in North Dakota to develop workforce development partnerships. This commitment is anticipated to add to the local labor pool.

XIII.CONCLUSION

Q. Based on the studies and analyses conducted, and the testimony you have presented today, what are some of the conclusions North Plains has reached regarding the proposed Project?

A. As discussed earlier in my testimony, the North Plains Connector is anticipated to provide significant reliability and optionality benefits between the Eastern and Western Interconnects by connecting the WECC, MISO, and SPP systems. The North Plains Connector has support from potential investors, as well as regional stakeholders.

Regarding routing, specifically, the proposed Project Route and Corridor are the result of an extensive and iterative multi-year, stakeholder-first route development process. The proposed Route and Corridor reflect a balancing of interests, including regulatory compliance, landowner preference, agency and Tribal input, existing constraints, and design/construction feasibility. As demonstrated in the Consolidated Application, the proposed hearing exhibits, and testimony, the proposed Route and Corridor comply with local and PSC siting requirements. The proposed Route and Corridor also have strong stakeholder support, as evidenced by the status of local permitting and land rights acquisition.

For all of these reasons, North Plains requests that the PSC issue a Certificate of Corridor Compatibility and Route Permit for the Project.

Q. Does this conclude your Testimony?

A. Yes.