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July 15, 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
HVDC Line Structure 1418 - Cass County
Siting Exclusion Certificate
Our File No. 111345-000011

Dear Mr. Johnson:

Enclosed for filing please find eight copies of Minnesota Power's Certification Relating to N.D.C.C. § 49-22-03(4)(a)(1)(c) with Attachment A in the above-referenced matter.

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

Sincerely,

/s/ Casey A. Furey

Casey A. Furey

CAF/lh
Enc.

cc: Claudia Ciganik (via email)
Sarah Whiting (via email)

1 PU-26-286 Filed 07/15/2026 Pages: 39
Structure Replacement Request

Minnesota Power
Casey Furey, Crowley Fleck, PLLP

BILLINGS BISMARCK BOZEMAN BUTTE CASPER CHEYENNE HELENA KALISPELL MISSOULA SHERIDAN WILLISTON

C R O W L E Y F L E C K . C O M

STATE OF NORTH DAKOTA
PUBLIC SERVICE COMMISSION

Minnesota Power
HVDC Line Structure 1418 - Cass County
Siting Exclusion Certificate

Case No. PU-26-__

CERTIFICATION RELATING TO N.D.C.C. § 49-22-03(4)(a)(1)(c)

STATE OF Minnesota)
) ss.
COUNTY OF St. Louis)

Pursuant to N.D.C.C. § 49-22-03(4)(a)(1)(c), the undersigned, Daniel Gunderson, a representative of Minnesota Power, an operating division of ALLETE, Inc. (Minnesota Power), being first duly sworn upon oath, states as follows:

1. I am the Vice President - MP Transmission System Planning & Operations for Minnesota Power have authority to act on behalf of and bind Minnesota Power.
2. Minnesota Power owns and operates a 250kV high voltage direct current (HVDC) transmission line in North Dakota. The HVDC originates near Center, ND and terminates in Hermantown, MN and spans approximately 465 miles. Minnesota Power seeks to make certain improvements to a single pole location along the HVDC, Structure 1418, located within Section 8, Township 137 North, Range 53 West in Cass County (the "Project"). Project improvements include replacement of Structure 1418's existing aluminum lattice with a tubular steel monopole.
3. Construction of the HVDC began in 1973, predating the enactment of N.D.C.C. ch. 49-22 (the "Siting Act"). Pursuant to N.D.C.C. § 49-22-03(4)(a)(1)(c), a corridor width of 350 feet on either side of the centerline is designated for lines constructed prior to April 9, 1975. Thus, a 350-foot corridor has been applied to the Project (the "Corridor"), as reflected in Attachment A, Exhibit A hereto.
4. Minnesota Power conducted an environmental analysis of the relevant portion of the Corridor to assess the Commission's exclusion and avoidance area criteria designated under N.D. Admin. Code § 69-06-08-02(1)-(2). The analysis is contained in Attachment A hereto.
5. Construction of the Project relates to improvements to an existing electric transmission facility. Thus, the proposed activities are for the same type of facility as currently exists. *See* N.D.C.C. § 49-22-03(4)(a)(1).

6. Construction of the Project improvements will occur within a width of 350 feet on either side of the Project's centerline; the statutorily designated corridor for electric transmission lines in which constructed commenced prior to 1975. *See* N.D.C.C. § 49-22-03(4)(a)(1)(c).
7. Pursuant to N.D.C.C. § 49-22-03(4)(a)(4),
 - a. Activities will not affect known exclusion or avoidance areas.
 - i. The Project is located within the Hamilton Wells Wildlife Management Area (WMA) as discussed in Attachment A and depicted in Exhibit B thereto. The construction and operation of the HVDC predates the WMA's establishment, which did not occur until 1988. Minnesota Power has coordinated with the North Dakota Game and Fish (NDGF) regarding the Project and associated Project access and has confirmed that no additional approvals are necessary from NDGF to construct the Project. The avoidance area set forth in N.D. Admin. Code § 69-06-08-02(2)(b) implicating the WMA does not apply to the Project because Minnesota Power's easement rights predate the WMA's establishment. Minnesota Power will continue to coordinate with the NDGF throughout the Project, including on measures to minimize potential construction impacts and restoration plans, as needed.
 - b. Activities are to improve the existing electric transmission facility.
 - c. Minnesota Power will comply with all applicable conditions and protections in siting laws and rules. Construction of the HVDC line commenced prior to the enactment of the Siting Act. As a result, there are no prior Commission orders governing the Project.
8. Minnesota Power intends to begin activities for the Project improvements on or around July 2026.

Minnesota Power

Dated 7/8/26

By 

Daniel Gunderson

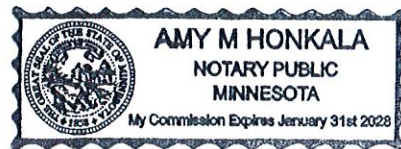
Vice President - Transmission System Planning &
Operations

STATE OF Minnesota
COUNTY OF St. Louis) ss.

On this 8th day of July, 2026, subscribed and sworn to before me by Daniel Gunderson as Vice President - MP Transmission System Planning & Operations for Minnesota Power.

1-31-2028
Expiration of Commission

Amy M. Honkala
Notary Public



HVDC Line Structure 1418 Replacement Project Minnesota Power



SUMMARY OF ENVIRONMENTAL ANALYSIS FOR NDPSC CERTIFICATION

Prepared by:



1 Main Street SE, Suite 300
Minneapolis, Minnesota 55414

June 2026

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1.0 INTRODUCTION

Minnesota Power, an operating division of ALLETE, Inc., owns and operates a 250-kilovolt (kV) High Voltage Direct Current (HVDC) Transmission Line in North Dakota. Minnesota Power is proposing to upgrade one structure (Structure 1418) on the existing HVDC Line, referred to as the HVDC Line Structure 1418 Upgrade Project (Project). Structure upgrades are necessary to accommodate the capacity increases made available from the HVDC Modernization Project. The structure upgrade will occur within Section 8, Township 137 North, Range 53 West in Cass County. Minnesota Power contracted with Merjent, Inc. (Merjent) to assist with environmental review and permitting for the Project. This report summarizes the environmental analysis conducted for Minnesota Power's Certification Pursuant to NDCC § 49-22-03(4)(a)(4) to be filed with the North Dakota Public Service Commission (PSC).

The original HVDC line was constructed using aluminum lattice structures, located within a 120-foot-wide easement. Minnesota Power proposes to replace the existing aluminum lattice Structure 1418 with a tubular steel monopole. The Project Area is defined as the structure replacement workspace and associated temporary access area. Temporary access areas will be used solely for ingress and egress and are not proposed for construction activities or permanent facilities. All temporary access areas will be restored to preconstruction conditions, and no permanent impacts are anticipated outside of the structure replacement footprint (see Exhibit B Figure in Appendix A). Construction is tentatively scheduled to begin in July 2026 and will be completed in approximately two months from the start date. The Project is anticipated to be in-service by late summer 2026.

1.1 NORTH DAKOTA PUBLIC SERVICE COMMISSION

Construction of the HVDC Line was initiated in 1973 and the Line was commissioned in 1977, prior to enactment of the Siting Act (NDCC Ch. 49-22). For the Project, Minnesota Power plans to comply with the siting exclusion certification requirements of NDCC § 49-22-03(4)(a). Since the DC Line was constructed before April 9, 1975, a corridor width of 350 feet on either side of the centerline (Project Corridor) applies pursuant to NDCC § 49-22-03(4)(a)(1)(c). Minnesota Power will conduct all Project construction activities within this Corridor, with the exception of some temporary access routes needed to reach structure replacements.

2.0 ENVIRONMENTAL ANALYSIS

Merjent conducted an environmental analysis of the Project using field surveys, publicly available data, and agency consultations. A summary of the environmental analysis is provided below.

2.1 WETLAND DELINEATION AND NATURAL RESOURCE FIELD SURVEYS

Merjent conducted wetland and waterbody delineations on September 25, 2025. Surveys were conducted within a 6.34-acre survey area; the Project workspace falls entirely within the surveyed area.

Wetland delineations followed methodology from the USACE Wetlands Delineation Manual (Environmental Laboratory, 1987) and the Regional Supplement to the USACE Wetland Delineation Manual: Great Plains Region (Version 2.0) (USACE, 2010). Other waters can include, but are not limited to, streams, ponds, and ditches. No wetlands or other waters were determined to be present within the Project workspace and survey area.

2.2 SPECIES ASSESSMENT

Merjent, on behalf of Minnesota Power, reviewed the U.S. Fish and Wildlife Service's (USFWS) Information for Planning and Consultation (IPaC) website¹ for a list of USFWS Endangered Species Act (ESA) threatened, endangered, proposed, and candidate species and designated critical habitat that may have been documented within the vicinity of the Project. An official species list from the USFWS North Dakota Ecological Services Field Office is enclosed. No threatened or endangered species were identified as potentially occurring within the Project Area. Similarly, no designated critical habitat is located within Project Area. Three candidate species were identified as potentially present in the Project Area; however, no significant adverse impacts to these species or their habitats are anticipated.

TABLE 1 USFWS ESA Species and Critical Habitat Potentially Present in the Project Area			
Scientific Name	Common Name	Federal Status	Designated Critical Habitat
Monarch Butterfly	<i>Danaus plexippus</i>	Proposed Threatened	None
Western Regal Fritillary	<i>Argynnis idalia occidentalis</i>	Proposed Threatened	None
Suckley's Cuckoo Bumble Bee	<i>Bombus suckleyi</i>	Proposed Endangered	None

2.2.1 MONARCH BUTTERFLY

The monarch butterfly is well-known for the species' long-distance migration throughout North America. There are two populations, located east and west of the Rocky Mountains. Primary drivers affecting the monarch include loss and degradation of habitat, exposure to insecticides, and climate change. The species can be found in a wide variety of habitats including prairies, grasslands, urban gardens, road ditches, and agricultural fields, if there are a healthy and abundant milkweed supply and a diversity of nectar resources. Milkweed is the sole host plant for oviposition and for the larvae to feed on until the larvae pupates into a butterfly. Most adults only live approximately two to five weeks; however, some overwintering adults live six to nine months as they undergo reproductive diapause.

Based on the widespread range of the monarch and the potential presence of suitable habitat, the monarch butterfly may occur in the Project. Project actions may have minor, temporary impacts on native vegetation serving as habitat to monarch butterflies; however, no long-term, significant impacts are anticipated. If the USFWS subsequently determines the species should be listed and protection for the species coincides with Project construction, Minnesota Power will coordinate with the USFWS at that time.

2.2.2 WESTERN REGAL FRITILLARY

The western regal fritillary butterfly is found in large, intact, contiguous native tallgrass prairie habitats in portions of Arkansas, Colorado, Illinois, Indiana, Iowa, Kansas, Minnesota, Missouri, Nebraska, North Dakota, Oklahoma, South Dakota, Wisconsin, and Wyoming. Regal fritillaries can range widely with females potentially traveling up to 100 miles searching for three main habitat components: violet hostplants for larvae, nectar plants for adults, and native grasses to provide protection throughout the life cycle. Adults can be found foraging in both upland and wet prairie habitats; however, habitat can only be considered suitable for all life stages if violet species are present to provide shelter and forage for larvae. The density of violets seems to correlate

¹ Information for Planning and Consultation (IPaC). USFWS website. Available at <https://ecos.fws.gov/ipac/>. Accessed April 2026.

positively to number of butterflies within a given area. Habitat alteration has reduced the species' range and abundance.

As evidenced by the desktop review, the Project overlaps the western regal fritillary's current range. Because the western regal fritillary is a grassland specialist that is unable to survive in row crop fields, non-native pastures, and developed areas surrounding prairie remnants, their presence may be limited to the larger grasslands and the occasional smaller grassland parcels that they utilize for dispersal. Native prairies in and adjacent to the Project Area have the potential to contain violets. Based on the presence of available suitable habitat, the western regal fritillary may occur in the Project Area.

Project actions may have minor, temporary impacts on native vegetation serving as potential habitat to western regal fritillaries; however, no long-term, significant impacts are anticipated. If the USFWS subsequently determines the species should be listed and protection for the species coincides with Project construction, Minnesota Power will coordinate with the USFWS at that time.

2.2.3 SUCKLEY'S CUCKOO BUMBLE BEE

Suckley's cuckoo bumble bee is a parasitic species which usurps the nests of other *Bombus* species. As an obligate social parasite of social bumble bees, the species requires a host colony to raise young born from eggs laid by Suckley females; the species cannot successfully reproduce without the workers of the host colony to continue collecting pollen and nectar to feed her offspring. Documented host species include the Nevada bumble bee (*Bombus nevadensis*) and the Western bumble bee (*Bombus occidentalis*). Once developed, all Suckley's adults are reproductive, and leave the nest to mate; males die after mating, but mated females feed on nectar and pollen prior to overwintering. Females overwinter underground or in leaf litter, mulch, decomposing vegetation, or under logs that produce suitable thermal qualities to survive the winter months. Females emerge from hibernation in late spring after host species queens emerge and start forming colonies (i.e., early April to late May, depending on region); female Suckley's bees will forage alone until entering a suitable host colony.

The species is found in a variety of habitats, including prairies, grasslands, farmsteads, woodlands, boreal forests, active and fallow agricultural fields, and urban areas. Suitable summer foraging areas will include a diversity of nectar and pollen sources, and host nests are often located in abandoned rodent burrows or other underground cavities. Knowledge of overwintering sites is limited; sites reported in the literature for other *Bombus* species include sandy, well-drained underground sites, shaded areas near tree lines, or other areas with low moisture levels and protection from environmental and physical stressors.

The Project is within Suckley's cuckoo bumble bee's primary range. As evidenced during the desktop review, portions of the Project Area may potentially provide suitable breeding, foraging, and dispersal habitat for the species. Based on the range of the species and the presence of suitable habitat, Suckley's may occur in the Project. Project actions may have minor, temporary impacts on native vegetation serving as habitat for Suckley's; however, no long-term, significant impacts are anticipated. If the USFWS subsequently determines the species should be listed and protection for the species coincides with Project construction, Minnesota Power will coordinate with the USFWS at that time.

2.2.4 BALD AND GOLDEN EAGLE PROTECTION ACT

The BGEPA prohibits anyone without a permit issued by the Secretary of the Interior from taking bald (*Haliaeetus leucocephalus*) or golden (*Aquila chrysaetos*) eagles, including their parts, nests, or eggs. The BGEPA provides criminal and civil penalties for persons who take, possess, sell, purchase, barter, offer to sell, purchase or barter, transport, export or import, at any time or any manner, any bald or golden eagle, alive or dead, or any part, nest, or egg thereof. The BGEPA defines take as pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb. "Disturb" means to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available: 1) injury to an eagle, 2) a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or 3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior. In addition to immediate impacts, this definition also covers impacts that result from human-induced alterations initiated around a previously used nest site during a time when eagles are not present, if, upon the eagles return, such alterations agitate or bother an eagle to a degree that injures an eagle or substantially interferes with normal breeding, feeding, or sheltering habits and causes, or is likely to cause, a loss of productivity or nest abandonment.

In North Dakota, bald eagle breeding season begins January 15 and lasts through August 31. Most bald eagles nest in secluded forested landscapes or along wooded streams and lakes. Generally, the combination of a large tree (such as a cottonwood), a food supply, and water within reasonable flying distance provide suitable bald eagle nesting habitat. North Dakota also supports populations of golden eagles, primarily found in the western part of the state. No eagle nests were identified during the natural resource field surveys (dated September 25, 2026). However, if an active eagle nest is identified within 660 feet of the Project Area during the nesting season, Minnesota Power will stop work and, if necessary, coordinate with the USFWS to comply with BGEPA.

2.3 CULTURAL RESOURCE FIELD SURVEY

Merjent conducted a Class I and Class III cultural resource inventory in support of the Project to determine impacts relative to archaeological sites. Results of the Class I literature review identified six cultural sites within 1 mile of the Project. Four sites are unevaluated for inclusion in the National Register of Historic Places (NRHP) and two sites are not eligible. None of these previously identified sites are located within the Project Area.

The Class III inventory of the full Project Area (6.34 acres) was conducted on May 19, 2026. No new cultural resources were discovered during the survey. Based on the results of the Class I and Class III investigations, no impacts on cultural resources are anticipated.

2.4 NORTH DAKOTA PUBLIC SERVICE COMMISSION EXCLUSION/AVOIDANCE AREA REVIEW

Merjent conducted a review of the North Dakota Administrative Code (NDAC) § 69-06-08-02 Transmission Facility Corridor and Route Criteria for the Project using information collected through desktop/publicly available data² and field surveys. Additionally, Minnesota Power submitted a request for agency review and comment to all designated agencies and officers

² The sources of publicly available geographic information systems (GIS) data utilized for this analysis included the NDGISHUB, ESRI, EPA, National Park Service, PAD-US 4.1, USDA, USFWS, NRCS, USGS, and NDGS GIS sources.

outlined in NDAC § 69-06-01-05, including but not limited to USACE, USFWS, the State Historical Society of North Dakota, and U.S. Department of Defense. Where a response was received as of the date of this submittal, it is noted below, if applicable, and included in Appendix B. The Transmission Facility Corridor and Route Criteria (NDAC § 69-06-08-02) exclusion and avoidance areas have been analyzed for the Project (see Table 3 below).

TABLE 3

North Dakota Public Service Commission Exclusion and Avoidance Areas for Transmission Facilities

Exclusion/Avoidance Areas	Impacted by the Project	Description
Exclusion Areas (North Dakota Administrative Code, § 69-06-08-02(1), Transmission Facility Corridor & Route Criteria)		
Designated or registered national: parks; memorial parks; historic sites and landmarks; natural landmarks; monuments; and wilderness areas.	No	Based on publicly available data from ESRI and Protected Areas Database of the United States (PAD-US) 4.1 Spatial Analysis and Statistics, no designated or registered national: parks; memorial parks; historic sites and landmarks; natural landmarks; monuments; and wilderness areas are present within the Project Corridor. As a result, the Project will not impact these resources.
Designated or registered state: parks; historic sites; monuments; historical markers; archaeological sites; and nature preserves.	No	Based on publicly available data through the NDGISHUB and surveys conducted by Merjent, no designated or registered state: parks; historic sites; monuments; historical markers; or nature preserves are present within the Project Corridor. As a result, the Project will not impact these resources.
County parks and recreational areas; municipal parks; and parks owned or administered by other governmental subdivisions.	No	Based on ESRI and PAD-US 4.1 data, no county parks and recreational areas; municipal parks; and parks owned or administered by other governmental subdivisions are present within the Project Corridor. As a result, the Project will not impact these resources.
Areas critical to the life stages of threatened or endangered animal or plant species.	No	Merjent reviewed the USFWS IPaC list of threatened, endangered, proposed, and candidate species and designated critical habitat in the Project Corridor. No threatened or endangered species or designated critical habitat have been documented within the vicinity of the Project Corridor. As such, no threatened or endangered animal or plant species are expected to be impacted by the Project. See Section 2.2.
Areas where animal or plant species that are unique or rare to this state would be irreversibly damaged.	No	Merjent conducted a desktop review of the Project Corridor and field surveys in 2026 in support of the Project. No unique or rare plant species were identified, and no rare or unique animals are expected to be impacted by the Project. See Section 2.2.
Areas within 1,200 feet of the geographic center of an intercontinental ballistic missile (ICBM) launch or launch control facility.	No	Merjent on behalf of Minnesota Power, requested review and comment from the U.S. Department of Defense (USDOD), Grand Forks Air Base, and Minot Air Force Base. No response was received, but an online review of missile facilities did not identify any within 1,200 feet of the Project (ND 2026). As a result, no impacts are anticipated.
Areas within 30 feet on either side of a direct line between an ICBM launch facility and a missile alert or launch control facilities to avoid microwave interference.	No	Merjent, on behalf of Minnesota Power, requested review and comment from the USDOD, Grand Forks Air Base, and Minot Air Force Base. No response was received, but an online review of missile facilities did not identify any that would result in the Project being located within 30 feet from either side of a direct line between facilities. As a result, no impacts are anticipated.

Exclusion/Avoidance Areas	Impacted by the Project	Description
Avoidance Areas (North Dakota Administrative Code, § 69-06-08-02(2), Transmission Facility Corridor & Route Criteria)		
Designated or registered national: historic districts; wildlife areas; wild, scenic, or recreational rivers; wildlife refuges; and grasslands.	No	Merjent reviewed the National Wild and Scenic Rivers System online database; there are no designated wild and scenic rivers in ND, and no designated wilderness areas are within the Project Corridor. Based on the NDGISHUB, USGS PAD-US 4.1, and USFWS data, no existing USFWS lands or easements are located in the Project Corridor. Based on NRHP data, no historic districts are located in the Project Corridor. As a result, no impacts are anticipated.
Designated or registered state: wild, scenic, or recreational rivers; game refuges; game management areas; management areas; forests; forest management lands; and grasslands.	No	The Project is in the Hamilton Wells Wildlife Management Area (WMA), owned and managed by the North Dakota Game and Fish Department (NDGF). The WMA was established on January 16, 1988. In consultation with the NDGF, Minnesota Power confirmed that its easement rights within the Project area pre-date the establishment of the WMA and will have a formal agreement in place approving construction access to Structure 1418 from areas outside of the designated easement. No additional approvals are required from NDGF for the Project. Therefore, NDAC § 69-6-08-02(b) does not apply to the Project. Minnesota Power will continue to coordinate with the NDGF throughout the Project, including on measures to minimize potential construction impacts and restoration plans, as needed. Additionally, Minnesota Power received a response from the Bureau of Land Management (dated May 21, 2026) that they have no concerns with the Project.
Historical resources which are not designated as exclusion or avoidance areas.	No	Merjent conducted a Class I and Class III cultural survey in support of the Project to identify archaeological sites. No previously identified or new cultural resources were discovered during the survey. Refer to Section 2.3. Based on the results of the Class I and Class III investigations, no impacts to historical or cultural resources are anticipated, including those which are not designated as exclusion or avoidance areas.
Areas that are geologically unstable.	No	Merjent reviewed the North Dakota Geologic Survey's landslide deposit data (NDGS 2023) and abandoned mine data found on the NDGISHUB; no landslides or abandoned mines are located in the Project Corridor. As such, no impacts are anticipated. In addition, Merjent requested review and comment from NDGS in May 2026. A response was received on May 29, 2026, stating that there are no geologic concerns, landslides, or unstable grounds in the Project location.
Within 500 feet [152.4 meters] of a residence, school, or place of business. This criterion shall not apply to a water pipeline transmission facility. This avoidance area may be waived by the owner.	No	No residences, schools, or places of business are within 500 feet of Structure 1418. As a result, no impacts are anticipated.
Reservoirs and municipal water supplies.	No	Merjent reviewed the NDGISHUB Source Water Protection Areas (Community/Non-Community) data; no source water protection areas are located in the Project Corridor. As a result, no impacts are anticipated.
Water sources for organized rural water districts.	No	Merjent reviewed the NDGISHUB Rural Water Districts data. There are no river crossings or water sources noted for organized rural water districts. As a result, no impacts are anticipated.

Areas of recreational significance which are not designated as exclusion areas.	No	No recreational areas are known to occur in the Project Corridor. As a result, no impacts are anticipated.
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3.0 REFERENCES

- Environmental Laboratory. 1987. Corps of Engineers Wetlands Delineation Manual. Technical Report Y-87-1. U.S. Army Engineer Waterways Experiment Station, Vicksburg, Miss.
- Geological, U.S., 2025, *Protected Areas Database of the United States (PAD-US) 4.1 Spatial Analysis and Statistics*: U.S. Geological Survey data release, <https://doi.org/10.5066/P96WBCHS>. Accessed May 2026.
- North Dakota Geographic Information Systems (NDGIS). 2026. North Dakota GIS Hub Data Portal. Available online at: <https://gishubdata-ndgov.hub.arcgis.com/>. Accessed May 2026.
- North Dakota Geological Survey. 2023. North Dakota Landslide Maps. Available online at: <https://www.dmr.nd.gov/ndgs/landslides/>. Accessed May 2026.
- USACE. 2010. Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Great Plains Region (Version 2.0). Ed. J.S. Wakeley, R.W. Lichvar, and C.V. Noble. ERDC/EL TR-10-1. Vicksburg, MS: U.S. Army Engineer Research and Development Center
- USFWS. 2026. IPaC Information for Planning and Consultation. Available online at: <https://ecos.fws.gov/ipac/>. Accessed April 2026.

APPENDIX A

PROJECT FIGURES





AN ALLETE COMPANY



0 250 500 Feet

1:6,000



Structure 1418
HVDC Line Replacement Project
Minnesota Power
Exhibit A
Cass County, North Dakota

○ Existing Structure

Structure Workspace

Temporary Access

Existing Alignment

Project Corridor

County Boundary

Date: (5/20/2026)

Source: Z:\Clients\M_PMN_Power\DC_Line_Replacement\ArcGIS\Permitting\State\PSC_Certificate\DC_Line_PSC_Certificate.aprx




AN ALLETE COMPANY



0 250 500
Feet

1:6,000



Structure 1418
HVDC Line Replacement Project
Minnesota Power
Exhibit B - Project Plan View
Cass County, North Dakota

-  Existing Structure
-  Structure Workspace
-  Temporary Access
-  Existing Alignment
-  Wildlife Management Area
-  County Boundary

Date: (5/20/2026)

Source: Z:\Clients\M_PMN_Power\DC_Line_Replacement\ArcGIS\Permitting\State\PSC_Certificate\DC_Line_PSC_Certificate.aprx

APPENDIX B

AGENCY CONSULTATIONS

U.S. Fish and Wildlife Service IPaC



United States Department of the Interior

FISH AND WILDLIFE SERVICE
North Dakota Ecological Services Field Office
3425 Miriam Avenue
Bismarck, ND 58501-7926
Phone: (701) 250-4481 Fax: (701) 355-8513



In Reply Refer To:
Project Code: 2026-0093114
Project Name: Structure 1418

05/21/2026 14:13:34 UTC

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

Section 7 of the Endangered Species Act

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

The Act requires that actions authorized, funded, or carried out by Federal agencies not jeopardize federally threatened or endangered species or adversely modify designated critical habitat. To fulfill this mandate, Federal agencies (or their designated non-federal representative) must consult with the Service *if they determine their project and associated actions "may affect" listed species or critical habitat*. If Federal agencies or their non-federal representatives determine their project and associated actions will have "no effect" on listed species, their habitats, or designated critical habitat, consultation is not required. However, if a "no effect" is determined, we recommend that you maintain a written record in support of your conclusion.

Bald and Golden Eagle Protection Act and Migratory Bird Treaty Act

Additionally, while not all are listed as threatened or endangered, eagles and migratory birds

have protections under the Bald and Golden Eagle Protection Act (BGEPA) and the Migratory Bird Treaty Act (MBTA). The BGEPA prohibits take which is defined as, “pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, destroy, molest, or disturb” (50 CFR 22.3). Disturb is defined in regulations as, “to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, 1) injury to an eagle, 2) decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or 3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior.”. The MBTA makes it unlawful without a waiver to pursue, hunt, take, capture, kill, or sell birds listed as migratory birds, including eagles. The statute does not discriminate between live or dead birds and also grants full protection to any bird parts including feathers, eggs, and nests.

Service Property Interests

As part of the National Wildlife Refuge System, the Service administers fee title Refuge and Waterfowl Production Areas, as well as wetland and grassland easements, throughout North Dakota. For exact locations of Service interest lands, please contact the appropriate Wetland Management Districts (WMD) for guidance regarding FWS easements.

Northwest ND WMD Complex: Kyle Flanery, (701) 768-2548

Eastern ND WMD Complex: Dave Azure, (701) 285-3341

Central ND WMD Complex (also covers south and west): Todd Luke, (701) 442-5474

Attachment(s):

- Official Species List
- USFWS National Wildlife Refuges and Fish Hatcheries
- Wetlands

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

North Dakota Ecological Services Field Office

3425 Miriam Avenue

Bismarck, ND 58501-7926

(701) 250-4481

PROJECT SUMMARY

Project Code: 2026-0093114

Project Name: Structure 1418

Project Type: Transmission Line - Maintenance/Modification - Above Ground

Project Description: DC Line Replacement

Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@46.69007155,-97.38933746422713,14z>



Counties: Cass County, North Dakota

ENDANGERED SPECIES ACT SPECIES

There is a total of 3 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

-
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

INSECTS

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> There is proposed critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9743	Proposed Threatened
Suckley's Cuckoo Bumble Bee <i>Bombus suckleyi</i> Population: No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/10885 General project design guidelines: https://ipac.ecosphere.fws.gov/project/PXBPOSZ3KBBK5KTPXJSEDXRMSI/documents/generated/9852.pdf	Proposed Endangered
Western Regal Fritillary <i>Argynnis idalia occidentalis</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/12017	Proposed Threatened

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

WETLANDS

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

FRESHWATER EMERGENT WETLAND

- PEM1A

IPAC USER CONTACT INFORMATION

Agency: Merjent Inc.
Name: Mandy Bohnenblust
Address: 1 Main St SE, Suite 300
City: Minneapolis
State: MN
Zip: 55414
Email: mandy.bohnenblust@merjent.com
Phone: 6127463677

Agency Notification Responses

Re: [EXTERNAL MAIL] Re: [EXTERNAL] Re: [EXTERNAL MAIL] DC Line Structure Upgrade Project

From Claudia Ciganik (MP) <cciganik@mnpower.com>

Date Thu 5/21/2026 3:40 PM

To McKenzie, Chelsie J <cmckenzie@blm.gov>

Chelsie,

Thank you for your review and response. We appreciate your time and your confirmation that BLM has no concerns with the project.

Best,

Claudia Ciganik

Environmental Compliance Specialist I

Minnesota Power, Environmental & Land Management

C: 218-590-7220

From: McKenzie, Chelsie J <cmckenzie@blm.gov>

Sent: Thursday, May 21, 2026 1:55 PM

To: Claudia Ciganik (MP) <cciganik@mnpower.com>

Subject: [EXTERNAL MAIL] Re: [EXTERNAL] Re: [EXTERNAL MAIL] DC Line Structure Upgrade Project

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Claudia,

Thank you for getting me the KMZ file. I had a chance to review it today, and there doesn't appear to be any BLM managed lands involved. The BLM has no concerns for this project.

Chelsie McKenzie

Realty Specialist

Bureau of Land Management

North Dakota Field Office

99 23rd Avenue West, Suite A
Dickinson, ND 58601
Office: 701-227-7702
Cell: 701-502-1271

From: Claudia Ciganik (MP) <cciganik@mnpower.com>
Sent: Tuesday, May 19, 2026 1:47 PM
To: McKenzie, Chelsie J <cmckenzie@blm.gov>
Subject: [EXTERNAL] Re: [EXTERNAL MAIL] DC Line Structure Upgrade Project

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Hi Chelsie,

Please see the attached KMZ file containing the structure locations and construction limits.

Let me know if you have any additional questions.

Thank you,

Claudia Ciganik

Environmental Compliance Specialist I
Minnesota Power, Environmental & Land Management
C: 218-590-7220

From: McKenzie, Chelsie J <cmckenzie@blm.gov>
Sent: Monday, May 18, 2026 5:26 PM
To: Claudia Ciganik (MP) <cciganik@mnpower.com>
Subject: [EXTERNAL MAIL] DC Line Structure Upgrade Project

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Claudia,

I received an agency review request regarding the DC Line Structure Upgrade Project; I was just wondering if you had a KMZ file or legal land descriptions of the project.

Thank you

Chelsie McKenzie

Realty Specialist

Bureau of Land Management

North Dakota Field Office

99 23rd Avenue West, Suite A

Dickinson, ND 58601

Office: 701-227-7702

Cell: 701-502-1271

Re: [EXTERNAL MAIL] RE: Request for Review: DC Line Structure 1418 Upgrade

From Claudia Ciganik (MP) <cciganik@mnpower.com>

Date Mon 6/1/2026 9:45 AM

To Anderson, Fred J. <fjanderson@nd.gov>

Hi Fred,

Thanks for your quick review of the proposed project and for confirming that no geologic concerns, landslides, or areas of unstable ground have been identified at the project location. We appreciate the time and input your team has provided.

Best,

Claudia Ciganik

Environmental Compliance Specialist I

Minnesota Power, Environmental & Land Management

C: 218-590-7220

From: Anderson, Fred J. <fjanderson@nd.gov>

Sent: Friday, May 29, 2026 2:17 PM

To: Claudia Ciganik (MP) <cciganik@mnpower.com>

Subject: [EXTERNAL MAIL] RE: Request for Review: DC Line Structure 1418 Upgrade

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Dear Ms. Ciganik

The NDGS appreciates the opportunity to review and provide comment on this proposed electrical transmission project.

We compared the project location included in the May 27, 2026 comment solicitation letter against recently completed geologic mapping work in the area and did not note any geologic concerns with this location.

No landslide areas or areas of potentially unstable ground have been mapped at this location.

All our geologic mapping work products (maps, shapefiles, etc.) can be found on our website <https://www.dmr.nd.gov/dmr/ndgs> for your use in continued design and route planning work if needed.

Please let us know if there are any questions or comments regarding this review.

Regards,

Fred J. Anderson

Surface Geology Section Manager

701.328.8000 • fjanderson@nd.gov



www.dmr.nd.gov • 600 E Boulevard Ave, Dept. 474 • Bismarck, ND 58505

From: DMR Geological Survey <ndgs@nd.gov>
Sent: Friday, May 29, 2026 08:04
To: Anderson, Fred J. <fjanderson@nd.gov>
Subject: FW: Request for Review: DC Line Structure 1418 Upgrade

From: Claudia Ciganik (MP) <cciganik@mnpower.com>
Sent: Thursday, May 28, 2026 9:10 AM
To: DMR Geological Survey <ndgs@nd.gov>
Subject: Request for Review: DC Line Structure 1418 Upgrade

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Dear NDGS Staff,

Attached please find notice of an upcoming Minnesota Power structure upgrade project for your review. The notice was also recently mailed to your office; however, Minnesota Power is now proposing to complete construction on Structure 1418 (map attached) earlier than anticipated, or around July 2026, at the request of the landowner.

I look forward to your review and comment on the proposed work at Structure 1418. Please contact me if you have questions or require additional information regarding the Project.

Sincerely,

Claudia Ciganik

Environmental Compliance Specialist I

Minnesota Power, Environmental & Land Management

C: 218-590-7220

A: 30 W Superior St | Duluth, MN 55802



RE: [EXTERNAL MAIL] DC Line Structure Upgrade

From Vigesaa, Claire <cvigesaa@nd.gov>
Date Wed 5/27/2026 10:58 AM
To Claudia Ciganik (MP) <cciganik@mnpower.com>
Cc Cheryl Froelich (BNI Energy) <cfroelich@bnienergy.com>

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Thank you Claudia, this is helpful.

Claire Vigesaa, Executive Director
North Dakota Transmission Authority
406-489-3881

From: Claudia Ciganik (MP) <cciganik@mnpower.com>
Sent: Tuesday, May 26, 2026 3:27 PM
To: Vigesaa, Claire <cvigesaa@nd.gov>
Cc: Cheryl Froelich (BNI Energy) <cfroelich@bnienergy.com>
Subject: Re: [EXTERNAL MAIL] DC Line Structure Upgrade

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Hi Claire,

Thanks for taking a look at the notice and for your support.

Happy to provide a bit more context on the “how” and “why.”

Why:

The upgrades are part of a broader effort to modernize aging HVDC infrastructure and maintain long-term system reliability. Some of the existing structures are approaching the end of their service life, and these replacements help ensure continued safe and reliable operation of the line.

In some cases, replacement structures may be taller to maintain clearance requirements and align with updated design standards. These upgrades also support system improvements associated with the broader HVDC modernization project.

How:

The work generally involves replacing select existing structures with new structures near their current locations. In most cases, we plan to:

- Remove the existing structure
- Install a new structure as close as practicable to the existing structure
- Access structures using existing easements where possible, and coordinate with landowners where off-easement access is needed to minimize impacts and respect landowner rights

We're aiming to keep impacts as localized as practicable by working within the existing right-of-way and limiting new disturbance wherever possible.

Please let me know if you have any follow-up questions. I'm happy to discuss further or set up a call if that's helpful.

Thank you,

Claudia Ciganik

Environmental Compliance Specialist I
Minnesota Power, Environmental & Land Management
C: 218-590-7220

From: Vigesaa, Claire <cvigesaa@nd.gov>
Sent: Wednesday, May 20, 2026 8:52 AM
To: Claudia Ciganik (MP) <cciganik@mnpower.com>
Cc: Cheryl Froelich (BNI Energy) <cfroelich@bnienergy.com>
Subject: [EXTERNAL MAIL] DC Line Structure Upgrade

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Claudia,

I received the notice/maps of your proposed HVDC Structure upgrades in North Dakota. We are supportive of your modernization project and the related structure upgrade. It would be helpful if you could share a little more detail on the “how” and “why” so that I can be well equipped to support the work and answer questions that may come to me.

Feel free to answer by email or call if that is more convenient.

Thanks,

Claire

Claire Vigesaa, Executive Director
North Dakota Transmission Authority
406-489-3881

May 22, 2026

Claudia Ciganik
Environmental Compliance Specialist 1
ALLETE, Inc – Minnesota Power
30 West Superior St.
Duluth, MN 55802

Dear Ms. Ciganik:

SUBJECT: DC-Line-Structure-Upgrade-Project

We have reviewed your May 15, 2026 letter and offer the following comments.

This project should have no adverse effect on the North Dakota Department of Transportation highways.

If the project requires any work to be done on highway right of way, it will be necessary to obtain the appropriate permits and risk management documents from the appropriate Department of Transportation District Engineer:

Any Utility line work performed on NDDOT highway right of way will require following the conditions of any current utility permit or applying for a new NDDOT Utility Permit from the NDDOT's District Office. Please contact the appropriate Department of Transportation District Engineer.

Bismarck District- Larry Gangl at 701-328-6955
Valley City District- Jay Praska at 701-845-8816
Fargo District- Aaron Murra at 701-239-8974

Sincerely,



Jon Ketterling, P.E.
Director – Office of Project Development

57/jk/mv
Enclosure

C: Larry Gangl, Bismarck District Engineer
Jay Praska, Valley City District Engineer
Aaron Murra, Fargo District Engineer



United States Department of Agriculture

Natural Resources
Conservation Service

Bismarck State Office
PO Box 1458
Bismarck, ND
58502-1458

Voice 701.530.2000
Fax 855-813-7556

May 27, 2026

Claudia Ciganik
ALLETE, Inc. Minnesota Power
30 West Superior St.
Duluth, MN 55802

Dear Ms. Ciganik:

The Natural Resources Conservation Service (NRCS) has reviewed your letter dated May 15, 2026, concerning DC Line Structure Upgrade Project in Barnes, Burleigh, Cass, Kidder, Oliver, Ransom, Richland, and Stutsman Counties, North Dakota.

NRCS has a major responsibility with the Farmland Protection Policy Act (FPPA) in documenting conversion of farmland (i.e., Prime, Statewide Importance and/or Local Importance) to non-agricultural use when federal funding is used. Your project is a proposed upgrade of current structures of an existing +/-250 kV High Voltage Direct Current Transmission Line where an easement was previously acquired for the original transmission line build. Projects are exempted from FPPA on land where easements were acquired prior to August 4, 1984; therefore, no further action is needed.

If you have additional questions pertaining to FPPA, please contact Lance Duey, Assistant State Soil Scientist, NRCS, Bismarck, North Dakota, at (701) 530-2109.

**JORDAAN THOMPSON
LARSON**

JORDAAN THOMPSON LARSON
Acting State Soil Scientist

Digitally signed by JORDAAN
THOMPSON LARSON

Date: 2026.05.29 09:39:46 -05'00'

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