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May 2, 2023

VIA ELECTRONIC FILING

The Department of Energy
Grid Deployment Office
1000 Independence Avenue SW
Washington, DC 20585-0350

**RE: Application for Renewal to Export Electric Energy
Minnesota Power
Docket No. EA-196-___**

Dear Sir/Madam:

Attached please find the Application of Minnesota Power for Renewal of Authorization to Transmit Electric Energy to Canada, together with verification, opinion of counsel and exhibits. Minnesota Power respectfully requests that the renewal be a 5-year authorization, or the longest term period available under the Department's rules and regulations.

Minnesota Power will access Pay.gov in order to pay the \$500 filing fee for this Renewal Application.

If there are any questions regarding this filing, please contact the undersigned counsel for the Company.

Yours truly,

A handwritten signature in black ink that reads "David R. Moeller". The signature is written in a cursive, flowing style.

David R. Moeller
Senior Regulatory Counsel

Enclosures

**UNITED STATES OF AMERICA
BEFORE THE
DEPARTMENT OF ENERGY
GRID DEPLOYMENT OFFICE**

Minnesota Power

)
)

Docket No. EA-196-_____

**APPLICATION OF MINNESOTA POWER
FOR RENEWAL OF AUTHORIZATION TO
TRANSMIT ELECTRIC ENERGY TO CANADA**

ALLETE, Inc., d/b/a Minnesota Power (Minnesota Power), pursuant to Section 202(e) of the Federal Power Act (FPA)(16 U.S.C. §824a(e)) and 10 C.F.R. §205.300 *et seq.* (1966), hereby submits an application for renewal of authorization to transmit electric energy from the United States to Canada for a period of five years (or for such other period as the Department deems appropriate.)

I. DESCRIPTION OF APPLICANT

The exact legal name of the applicant is ALLETE, Inc., d/b/a Minnesota Power (Minnesota Power). Minnesota Power is a division of ALLETE that owns electric generation and transmission facilities and sells and distributes electricity within its northern Minnesota service territory. Minnesota Power is authorized by the Federal Energy Regulatory Commission (FERC) to make sales of electric power at wholesale in interstate commerce, at negotiated rates under the Restated Mid-Continent Area Power Pool (MAPP) Agreement and its market-based rate tariff as well as other FERC Rate Schedules on file at FERC. Minnesota Power is a MISO transmission customer.

II. PARTNERS

Minnesota Power is not seeking authorization to export power on behalf of, or in conjunction with, any partners or partnerships.

III. COMMUNICATIONS

Communications regarding this application should be addressed to the following:

David R. Moeller
Senior Regulatory Counsel
ALLETE, Inc.
30 West Superior Street
Duluth, MN 55802
(218) 723-3963
Fax (218) 723-3955

IV. ORGANIZATION OF APPLICANT, AUTHORITY TO DO BUSINESS

ALLETE, Inc. is a Minnesota corporation having its principal place of business in Duluth, Minnesota. Currently ALLETE, Inc. is authorized to do business in the states of Minnesota, Wisconsin, North Dakota and Florida.

V. JURISDICTION

Minnesota Power does not know of any other Federal, State or local government that has jurisdiction over the actions to be taken under the authority sought in this Application.

VI. FACILITIES

Minnesota Power intends to export power over existing transmission interconnections between the United States and Canada. Exhibit C to this Application provides the location and description of the transmission facilities through which the electric energy may be delivered into Canada, and includes the name of the facility owners as well as the Presidential Permit numbers.

VII. TECHNICAL DISCUSSION OF PROPOSAL

Minnesota Power currently has two (2) export authorizations in its name for international interconnection facilities – one located at International Falls, Minnesota (PP-78) and one crossing the Canadian Border in Roseau County, Minnesota (PP-398). The electric power Minnesota Power will export, on either a firm or interruptible basis, will generally be purchased from others voluntarily and will, therefore, be surplus to the needs of the selling entities. Minnesota Power does have an obligation to serve native load in northeastern Minnesota. However, the exports proposed by Minnesota Power will not impair its ability to meet any current and prospective retail or wholesale power supply obligations in the United States.

Minnesota Power's proposed exports will not impair or tend to impede the sufficiency of electric supplies in the United States or the regional coordination of electric utility planning or operations.

VIII. PROCEDURES

Minnesota Power's application for renewal is consistent with United States energy policy established in the Energy Policy Act of 1992, the North American Free Trade Agreement of 1993 and FERC Order No. 888, which fosters more efficient and competitive North American energy markets.

Minnesota Power, in this proceeding, is seeking renewal of its authorization, as a power marketer, to export electricity through existing border facilities. Minnesota Power now files quarterly reports with the Department reporting its exports and imports; and will similarly report exports and imports resulting from the export authorization requested in this proceeding, as directed by the Department. Minnesota Power has secured sufficient transmission service for the delivery of power to the border as shown on Exhibit C. Also, Minnesota Power is willing to accept general conditions consistent with the Department's previous power marketer authorizations for this additional export authorization. In particular, if required by the Department, exports made by Minnesota Power will not exceed the export limits for the transmission facilities utilized by Minnesota Power, or otherwise cause a violation of the terms and conditions set forth in the export authorizations applicable to each; when scheduling the delivery of power, Minnesota Power will comply with the applicable NERC reliability criteria, standards, and guidelines; and, for each calendar quarter, Minnesota Power will provide the Department with reports indicating the gross amount of electricity delivered to Canada, consideration received during each month, and the maximum hourly rate of transmission, as well as any additional annual reports required by the Commission.

IX. EXHIBITS

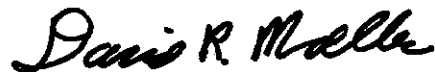
The following exhibits are attached hereto:

- Exhibit A - Agreements (Not applicable)
- Exhibit B - Legal Opinion of Minnesota Power's counsel
- Exhibit C - Transmission Facilities (Submitted in lieu of Maps)
- Exhibit D - (Not applicable)
- Exhibit E - (Not applicable)
- Exhibit F - (Not applicable)

X. CONCLUSION

WHEREFORE, Minnesota Power respectfully requests that the Department review and grant this Application for Renewal in an expeditious manner.

Respectfully submitted,



David R. Moeller
Senior Regulatory Counsel
ALLETE, Inc.
30 West Superior Street
Duluth, MN 55802
(218) 723-3963

Dated this 2nd day of May, 2023.

VERIFICATION


STATE OF MINNESOTA)
) ss.
COUNTY OF ST. LOUIS)

I, David R. Moeller, Senior Regulatory Counsel of ALLETE, Inc., d/b/a Minnesota Power, having knowledge of the matters set forth in the above Application of Minnesota Power for Renewal of Authorization to Transmit Electric Energy to Canada, hereby verify that the contents thereof are true and correct to the best of my knowledge and belief.

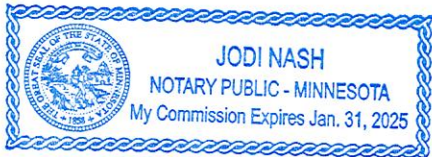
David R. Moeller

David R. Moeller

Subscribed and sworn to before me
this 2nd day of May, 2023.



Notary Public, State of Minnesota





DAVID MOELLER
Senior Regulatory Counsel

218-723-3963
E-mail dmoeller@allete.com

May 2, 2023

The Department of Energy
Grid Deployment Office
1000 Independence Avenue SW
Washington, DC 20585-0350

**RE: Application for Renewal to Export Electric Energy
ALLETE, Inc. d/b/a Minnesota Power
Docket No. EA-196-_____**

Dear Sir/Madam:

The following opinion is given in support of the Application of ALLETE, Inc., d/b/a Minnesota Power for renewal of authorization to transmit electric energy to Canada.

1. I am an attorney, authorized to practice law in Minnesota, North Dakota, and Wisconsin;
2. I am currently serving as Senior Regulatory Counsel of ALLETE, Inc., d/b/a Minnesota Power;
3. ALLETE, Inc., d/b/a Minnesota Power is duly incorporated, validly existing and in good standing under the laws of the State of Minnesota and is authorized to do business in the states of Minnesota and such other states as required by the current nature of its business.
4. ALLETE, Inc., d/b/a Minnesota Power has full corporate power and authority to buy, sell or act as a marketer/broker in the sale and exportation of electric energy as requested in this Application; and
5. ALLETE, Inc., d/b/a Minnesota Power intends to comply with all applicable Federal and State laws.

A handwritten signature in black ink that reads "David R. Moeller". The signature is written in a cursive, flowing style.

David R. Moeller
Senior Regulatory Counsel

**TRANSMISSION LINES AT THE US-CANADA BORDER
AUTHORIZED FOR THIRD-PARTY USE**

<u>Present Owner</u>	<u>Location</u>	<u>Voltage</u>	<u>Presidential Permit No.</u>¹
Bangor Hydro-Electric Company	Baileyville, ME	345-kV	PP-89
Basin Electric Power Cooperative	Tioga, ND	230-kV	PP-64
Bonneville Power Administration	Blaine, WA	2-500-kV	PP-10
	Nelway, WA	230-Kv	PP-36
	Nelway, WA	230-kV	PP-46
CHPE LLC	Champlain, NY	±230-kV DC	PP-481-1
Eastern Maine Electric Cooperative	Calais, ME	69-kV	PP-32
Highgate Joint Owners	Highgate, VT	120-kV	PP-82-5
International Transmission Company	Detroit, MI	230-kV	PP-230
	Marysville, MI	230-kV	PP-230
	St. Claire, MI	230-kV	PP-230
	St. Claire, MI	345-kV	PP-230
ITC Lake Erie Connector	Erie County, PA	320-kV	PP-412
Joint Owners of the Highgate Project	Highgate, VT	120-kV	PP-82
Long Sault, Inc.	Massena, NY	2-115-kV	PP-24
Maine Electric Power Company	Houlton, ME	345-kV	PP-43
Maine Public Service Company	Limestone, ME	69-kV	PP-12
	Fort Fairfield, ME	69-kV	PP-12
	Madawaska, ME	138-kV	PP-29
	Aroostook, ME	2-69-kV	PP-29
Minnesota Power, Inc.	International Falls, MN	115-kV	PP-78
	Roseau County, MN	500-kV	PP-398
Minnkota Power Cooperative	Roseau County, MN	230-kV	PP-61
Montana Alberta Tie Ltd.	Cut Bank, MT	230-kV	PP-305
NECEC Transmission LLC	Beattie Twnshp, ME	±320-kV	PP-438
New York Power Authority	Massena, NY	765-kV	PP-56
	Massena, NY	2-230-kV	PP-25
	Niagara Falls, NY	2-345-kV	PP-74
	Devils Hole, NY	230-kV	PP-30

¹ These Presidential permit numbers refer to the generic DOE permit number and are intended to include any subsequent amendments to the permit authorizing the facility.

Niagara Mohawk Power Corp.	Devils Hole, NY	230-kV	PP-190
Northern States Power Company	Red River, ND	230-kV	PP-45
	Roseau County, MN	500-kV	PP-63
	Rugby, ND	230-kV	PP-231
Sea Breeze Olympic Converter LP	Post Angeles, WA	±450-kV DC	PP-299
TDI New England	Alburgh, VT	±320-kV DC	PP-400
Vermont Electric Power Co.	Derby Line, VT	120-kV	PP-66
Vermont Electric Transmission Co.	Norton, VT	±450-kV DC	PP-76