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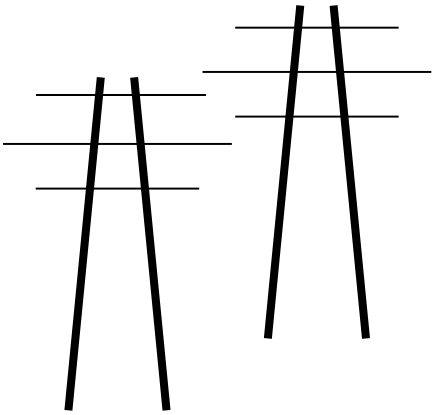


July 29, 2024

Rich Davis
EERA via eDockets & richard.davis@state.mn.us
MN Dept of Commerce
85 – 7th Place East, Suite 280
St. Paul, MN 55101

RE: The Prehn Family & NoCapX 2020 Scoping Comment
Wilmarth-N Rochester-Tremval a/k/a Mankato-Mississippi Transmission Line
PUC Dockets CN-22-532 and TL-23-157

Dear Mr. Davis:

Thank you for the opportunity to file this Comment, and for the Mankato-Mississippi road show over this past week. This Comment is made on behalf of the Prehn Family and NoCapX 2020.

I. PROCEDURAL COMMENTS

A. COMPLIANCE WITH MINNESOTA ENVIRONMENTAL POLICY ACT

An overarching concern regarding environmental review is that although it runs in a track separate from the Certificate of Need and Routing dockets, yet under the Minnesota Environmental Policy Act, it is to **"accompany the proposal through an administrative review process**."

> Subd. 6a. **Comments.** Prior to the preparation of a final environmental impact statement, the governmental unit responsible for the statement shall consult with and request the comments of every governmental office which has jurisdiction by law or special expertise with respect to any environmental effect involved. Copies of the drafts of such statements and the comments and views of the appropriate offices shall be made available to the public. The final detailed environmental impact statement and the comments received thereon shall precede final decisions on the proposed action and shall accompany the proposal through an administrative review process.

Minn. Stat. 116D.04, Subs. 6a.

The rough project schedule is on page 8 of the presentation:

SLIDE 8

Timeline

Event	Date
Application Submitted	April 2, 2024
Application Accepted	June 26, 2024
Public Info Meetings	July 8-11, 2024
EIS Scoping Decision	October 2024
Draft EIS Issued	March 2025
Public Hearings	April 2025
Final EIS Issued	June/July 2025
Commission's Final Decision	September 2025

I've observed project schedules with public hearings, evidentiary hearings, briefing and ALJ recommendation all before the release of FEIS and its attached comments made during environmental review. Although release of FEIS after these steps is before the final decision, it is not "accompanying the proposal through an administrative review process," and does not afford opportunity to submit public comments or public consideration of the adequacy of the FEIS. **THE FINAL EIS SHOULD BE RELEASED BEFORE THE CLOSE OF PUBLIC COMMENTS AND BRIEFING TO ALLOW REVIEW AND COMMENTS ON ADEQUACY** (Yes, I'm SHOUTING, this is important).

This late EIS release has been a problem, particularly where new route segments are added late and there is little or no notice and opportunity to comment regarding those new routes, and whether the FEIS is adequate. For example, this was an issue with the CapX 2020 route in Cannon Falls because the applicant did not pay sufficient to DOT Comments with routing prohibitions and new work-arounds were added at the last minute. The last minute work around was of course the "chosen route" because the preferred route was not acceptable under DOT's Policy of Accommodation." The affected landowners did not have adequate notice nor sufficient opportunity or ability to participate.

B. MISO IS NOT THE REGULATOR

The Commission and Department must be clear in its review that it is the regulator, not MISO, and that review complies with Minnesota statutes and rules.

C. FILING OF AGENCY COMMENTS SEPARATELY IN eDOCKETS

Also a problem during CapX and ongoing was that agency comments such as the DOT's were not made available to the public in a recognizable way, for example, comments were provided to Commerce and were eFiled in groups, with agency comments hidden in a large group of

comments. Agency comments should be filed separately so that they are possible to find. Some agencies have adopted eFiling, making comments available, and this practice should be the norm. Public review of these comments is the only way that the public has to check to see if their "on the ground" concerns are recognized by agencies and to check whether y need to raise issues that they know of that have not been addressed.

D. PRESENTATION AT MEETINGS NEEDS CORRECTIONS AND BEEFING UP

i. Slides 3 and 26 have misstated the hierarchy of means to address impacts:

Provide an opportunity to participate in developing the scope of the EIS.
This includes:

- Commenting on potential impacts of the proposed project;
- Commenting on methods to minimize, mitigate, and avoid potential impacts; and proposing alternative routes or route segments for consideration.

The order should be AVOID, MINIMIZE, and lastly, MITIGATE.

ii. Opportunities for public participation are not sufficiently identified (Presentation, p. 8). As a frequent attendee and participant in meetings and hearings, I often hear comments that "there's nothing I can do," and "it doesn't matter, they won't listen to me." To a point, I can see why someone would say that, but I cannot understand such defeatist mindset. It doesn't help that Commerce and the Commission do not encourage public participation, do not even let people know what they CAN do! Minn. Stat. §216E.08.

For example, the purple "public participation" points should also list the participatory opportunities under statute and rule, including:

- Petition for intervention;
- Participate in the "public hearings," and also as a "participant" in the evidentiary hearings where they can testify, cross-examine and be cross-examined, and offer evidence;
- Affected parties may file Exceptions to the report of the ALJ;
- Request oral argument before the Commission;
- Petition for rehearing, amendment, vacation, reconsideration, or reargument if an affected person or party.

The presentation by PUC and Commerce, ideally the PUC's public participation person, should assure that all options for participation are shown in presentation and handouts, and should orally state them, maybe even have a separate public participation handout. It's very hard for regular folks to navigate the administrative process, and a "HOW-TO" would be helpful.

II. SCOPING COMMENTS - NEED

A. CONSIDERATION OF NEED GOES BEYOND ACCEPTANCE OF APPLICANT'S STATED PURPOSE AND CLAIMED NEED

In the meetings this week, it was stated in the Scoping Notice, the presentation (p. 27) and several times orally that at issue and up for comment is:

> **Are there other ways to meet the stated need for the project, for example, a different size project or a different type of facility?**

That statement means that the stated need/purpose as provided by an applicant is accepted and is the starting point for a need discussion. See Draft Scope, 1.0 "Purpose." This means that the purpose is accepted and questioning that purpose as stated is off the table. **NO!**

Size, type and timing of "need" is at issue – that's why there is a Certificate of Need process and criteria in law (Minn. Stat. §216B.243, Subd. 3a (1-12) -- and this is a Certificate of Need docket (CN-22-532). The applicant and/or MISO are not the arbiters of need. A need determination is to be made by the Commission after the review of factors, above, and a decision that is supported by facts and the record. A "stated need" by the applicant and/or a desire of MISO is not sufficient.

B. NEED AND SYSTEM ALTERNATIVES

The EIS must address use of a single circuit 230kV line. According to Xcel's application, page 162, the "System Peak Energy Demand" is 718 MVA. The project is designed for 3,585 MVA, Table 5-1. 3,585 MVA is roughly FIVE TIMES more than Xcel's highest claim of "System Peak Energy Demand" of 718. If "System Peak Energy Demand" is 718 MVA, according to Table 5.1, a single circuit 230kV line would be sufficient! See Draft Scope, 1.0 Design.

C. NEED - CUMULATIVE IMPACTS AND PHASED AND CONNECTED ACTIONS – EFFECT OF FOUR TRANSMISSION LINES PROPOSED IN SOUTHERN MINNESOTA

As testimony in the Arrowhead-Weston project declared 24 years ago regarding transmission, "it's all connected." That's a fundamental characteristic of "the grid." When considering "need," for a project, phased and connected actions must be considered.

This concept is important because, including this project, there are FOUR transmission lines originating in southern Minnesota, two of which go "against the current" of typical transmission power flows:

- Wilmarth-North Rochester-Tremval a/k/a Mankato-Mississippi (this docket)
- Brookings-Hampton 2nd circuit – CN-23-200 & TL-08-1474
- Big Stone-Alexandria-Big Oaks – CN-22-538 & TL-23-159/TL23-160
    - Against the flow, SW to NE
- MN Energy CONnection – CN-22-131 & TL-22-132
    - Against the flow, SW to NE

In light of all of these projects, and in light of existing transmission in southern Minnesota, is this project needed?

The EIS must evaluate "need" when considering the SW MN 345kV line (CN-01-1958) connecting into the MVP 3, 4 (TL-12-1337 and CN-12-1053), and the delayed but now fully permitted MVP 5, from SW Minnesota down into the top of Iowa and heading east into Wisconsin. Institutional memory:

Consideration of "phased and connected actions" must also include consideration of the Public Utilities Commission's repeated actions of permitting projects where there is no interconnection option available. Those projects waiting for interconnection should be identified, and the Commission's actions declared void. If there is interconnection available, documented and at a cost outlined in the MISO DPP System Impact Study Reports, that cost should be properly allocated to the project developers and not Minnesota ratepayers.

D. LINE LOSSES HAVE IMPACT ON "NEED" FOR A PROJECT

Line losses have an impact on "need" for a project, because the higher the line loss, the more generation must be built to deliver a set amount of energy to its destination. This is typically not considered, and must be. For example, the MN Energy CONnection transmission has declared an expected 200MW or more line loss, meaning that additional amount of generation must be built and paid for if the specific amount of energy is to be delivered, plus reactive power and that construction and transmission service cost weighs against "need" for the project.

Typically, and improperly, the line loss for the project applied for is expressed as a percentage and/or megawatts across the entire MISO system or Eastern Interconnect. Line loss is an aspect of the project that should be reviewed separately for this project, terminal to terminal, for this particular project, and not hidden as a very small percentage or low MW of an undisclosed total energy across the system. Line loss is the amount of energy that would be dissipated by transmission over distance, and the amount and impact of the MW of additional generation to assure the requisite load gets to the other end of the line. The amount of increased generation necessary to make up for line loss will increase "need" for the project, so line loss must be compared between the project as applied for, and all alternatives presented, including the "no build" alternative.

E. ADDITIONAL TRANSMISSION NEEDED STARTING AT WILMARTH?

The EIS must address why the starting point of Wilmarth is proposed for this project, which is not addressed in the application. Does Xcel plan to increase burning of garbage?[1] The Commission has recently been considering increased garbage burning and "biomass," which was been decreased as a matter of policy, and economics, that it was not cost effective and generates CO2. The biomass mandate was legislatively removed from the 1994 Prairie Island legislation and Commission related statutes – there is precedent..

On the other hand, Xcel's IRP 12 years ago stated it would shutter the Wilmarth and Red Wing garbage burners.

> ***For capacity planning and RES compliance planning purposes, we are assuming that Red Wing and Wilmarth will be retired at the end of 2012.***

Xcel IRP, pages 6-7 to 6-8. Xcel apparently recanted on that assumption. Is there a plan to increase garbage incineration? Is there a plan for increased generation in the immediate vicinity of Wilmarth? Where's the "need" for this project?

F. PROJECT IS OVERSIZED FOR XCEL'S "PEAK" OF 718 MVA

The project as proposed is oversized for Xcel's claimed "system peak energy demand" of 718 MVA, state on p. 162 of its application. The EIS, in considering size of the project, must consider a lower voltage line, i.e. a 230 kV single circuit. A 230 kV single circuit would provide 50% more than Xcel's "system peak energy demand," and would be less environmentally impactful and far more economical to build.

[1] See PUC Docket 23-151 and definition of "carbon free."

G. NO-BUILD ALTERNATIVE

Among other things, the "no-build alternative" must be evaluated in the EIS because it may well not be needed in light of the several other projects planned for ssouthern Minnesota:

- Wilmarth-North Rochester-Tremval a/k/a Mankato-Mississippi (this docket)
- Brookings-Hampton 2nd circuit – CN-23-200 & TL-08-1474
- Big Stone-Alexandria-Big Oaks – CN-22-538 & TL-23-159/TL23-160
- MN Energy CONnection – CN-22-131 & TL-22-132

III. SCOPING COMMENTS – ENVIRONMENTAL REVIEW OF TRANSMISSION PROPOSAL

A. INCLUDE CUMULATIVE IMPACTS AND PHASED AND CONNECTED ACTIONS

The cumulative impacts of existing transmission in the broad area that this project traverses, and phased and connected actions of new transmission proposed must be evaluated in the EIS.

The cumulative impact of the four other transmission projects originating in southern Minnesota could obviate some or even all of any claimed "need" for this project, which must be considered in the EIS. In addition to consideration of the impacts to those already affected by CapX 2020, the EIS must consider the project's "cumulative impacts" because this is one of **FOUR** transmission lines originating in southern Minnesota, all of which will have impacts on the others, and on the transmission system as a whole:

- Wilmarth-North Rochester-Tremval a/k/a Mankato-Mississippi (this docket)
- Brookings-Hampton 2nd circuit – CN-23-200 & TL-08-1474
- Big Stone-Alexandria-Big Oaks – CN-22-538 & TL-23-159/TL23-160
- MN Energy CONnection – CN-22-131 & TL-22-132

As above in paragraph II.C., consideration of "phased and connected actions" must also include consideration of the Public Utilities Commission's repeated actions of permitting projects where there is no interconnection option available. Those projects waiting for interconnection should be identified, and the Commission's actions declared void. If there is interconnection available, but at a cost outlined in the MISO DPPS studies, that cost should be properly allocated to the project developers and not Minnesota ratepayers.

B. MAGNETIC AND ELECTRIC FIELD CALCULATIONS ARE UNDERSTATED

i. Projected magnetic fields are grossly understated.

The EIS must include a correct chart of magnetic fields at the various distances shown in the Application and Appendix S**.** This correction must show the full range of potential magnetic fields, up to the full 3.585 MVA capacity of the project.

Over the years, the Commission and Dept. of Commerce have consistently refused to address the range of magnetic fields likely to be associated with any transmission project. This is a significant fail of environmental review. This issue has been raised repeatedly by this writer as an individual and in the course of representing clients – raised in comments, testimony, and evidence -- I've lost my patience. There is no excuse for this continued failure to address the full range of potential magnetic fields. Although Minnesota application requirements do not require disclosure of the potential magnetic fields based on the design specification of capacity (MVA), which in this case is 3,585 MVA, the state of Wisconsin does require disclosure. There is no prohibition of disclosure of this important fact, and the Department and the Commission should require it. See Draft Scope, 3.1 "Public Health and Safety," an admission that electric and magnetic fields are a Public Health and Safety issue.

The modeled magnetic fields shown in the application are grossly understated by roughly a factor of five. Application Ch. 7, 7.3.2.3 (p. 163, or 183 of pdf).

The application, Table 5-1, page 87, shows the Capacity (MVA) for the Double-Circuit 345kV line – a disclosure which should be repeated in the Application and Appendix S regarding electric and magnetic fields. From page 87 of the application:

The following table provides a general comparison of the capacity of transmission lines operated at different voltages assuming the same current of 3000 Amps.

Table 5-1
Comparison of Capacity by Voltage Level

Voltage Level	Capacity (MVA)
69 kV	358.5
115 kV	597.6
230 kV	1195.1
345 kV	1792.7
Double-Circuit 345/345 kV	3585.4
500 kV	2598.1
765 kV	3975[77]

On page 162 of the application, Xcel states the "System Peak Energy Demand" as 718 and 692 MVA. These figures are the highest stated in the Application:

The projected magnetic fields for different structure and conductor configurations for the Project are provided in **Table 7-19**. Graphs showing the calculated magnetic fields for the configurations listed in the table are included in **Appendix S**. Because magnetic fields are dependent on the current flowing on the line, magnetic fields were calculated for two different estimated typical system conditions during the Project's first year in service (2030). These two scenarios are: (1) System Peak Energy Demand and (2) System Average Energy Demand. The "System Peak Energy Demand" current flow (estimated loading of 718 MVA from Wilmarth to North Rochester and 692 MVA from North Rochester to Tremval, station beyond the Minnesota border) represents the current flow on the line during the peak hour of system-wide energy demand. The "System Average Energy Demand" current flow (estimated loading of 331 MVA from Wilmarth to North Rochester and 334 MVA from North Rochester to Tremval, station beyond the Minnesota border) represents the current flow on the line during a non-peak time (winter months) when there are high levels of wind generation and the transmission system is intact (i.e., no outages).

Oh, please, give me a break…

FULL DISCLOSURE: Obviously I'm not an engineer!

Below is a table calculating magnetic fields, using the "System Average Energy Demand" of 443 MVA (no disclosure of amps). What I don't know is whether for a double circuit the amperage is doubled or some other value, i.e., 6006.53 peak amps, or ??. Anyway, here's an attorney's guess – PROVE ME WRONG!

ADJUSTABLE TABLE

TABLE 5.2-6. Calculated Magnetic Fields (milligauss) for proposed double circuit 345 kV Transmission Line Designs (3.28 feet above ground)

STRUCTURE TYPE	SYSTEM CONDITION	CURRENT (AMPS)	DISTANCE TO PROPOSED CENTERLINES -300'	-200'	-100'	-75'	-50'	-25'	0'	25'	50'	75'	100'	200'	300'
1 CIRCUIT	PEAK	3000.00	8.98	18.98	63.86	98.86	163.18	266.48	362.39	338.18	203.64	115.80	71.14	18.75	8.18
DELTA CFG	AVERAGE	554.00	1.65	3.51	11.78	18.27	30.15	49.19	66.90	62.45	37.62	21.39	13.15	3.47	1.51
1 CIRCUIT	PEAK	3000.00	9.77	22.39	80.91	126.14	206.48	311.93	290.34	182.27	112.05	72.84	50.23	16.82	8.07
VERT CFG	AVERAGE	554.00	1.82	4.14	14.94	23.32	38.11	57.61	53.61	33.66	20.69	13.46	9.26	3.09	1.47
2 CIRCUIT W/	PEAK	3000.00	8.07	16.82	50.34	73.07	112.39	182.84	291.14	312.50	206.59	126.14	80.80	22.39	9.77
1 CKT ACTIVE	AVERAGE	554.00	1.51	3.12	9.29	13.50	20.76	33.77	53.75	57.71	38.15	23.28	14.90	4.14	1.82
2 CIRCUIT W/	PEAK	3000.00	2.16	6.59	37.73	69.09	135.91	260.23	341.25	262.05	137.50	70.11	38.52	6.70	2.16
2 CKTS ACTIVE	AVERAGE	554.00	0.39	1.23	6.98	12.76	25.11	48.07	63.01	48.39	25.39	12.97	7.12	1.23	0.42

ENTER MVA BELOW TO ADJUST CURRENT IN THE TABLE:	
3585.00	MVA PEAK
345.00	kV
1.73	3 Phase
6006.53	Amps PEAK CALC'D
334.00	MVA AVERAGE
345.00	kV
1.73	3 Phase
559.60	Amps AVERAGE CALC'D

What is clear is that the 3,585 MVA is roughly FIVE TIMES more than Xcel's highest claim of "System Peak Energy Demand" of 718. If "System Peak Energy Demand" is 718 MVA, according to Table 5.1, a single circuit 230kV line would be sufficient!!! That's something, as above, to be considered in evaluating possible system alternatives.

Each table in 7-19 and Appendix S must be updated/corrected with independent verification to show the capacity used for each row (MVA), to include calculated magnetic fields up to Amps and MVA shown by Applicant in the Application Table 5-1, 3,000 amps and 3,585.4 MVA. Again, Xcel's highest MVA used for the magnetic field charts is just 718 MVA. This is based on a quick look at information provided by the Applicants. The estimates based on Table 5.1 show that the magnetic field calculations are off by roughly a factor of FIVE. The Dept. of Commerce-ERA and the Commission should know better than to accept such obviously off statements given its "expertise[2]."

[2] Not that agency "expertise" is sufficient to avoid scrutiny! See Loper Bright Enterprises v. Raimondo, Secetary of Commerce, et al., No. 22-51, S.Ct., June 28, 2024 (online at https://www.supremecourt.gov/opinions/23pdf/22-451_7m58.pdf)

ii. Are electric field calculations as understated as those for magnetic fields?

The EIS must provide independently verified calculations of electric fields at expected distances with consideration that farming, hunting, and other activities may occur under the conductors and within the right of way.

C. SOCIOECONOMIC IMPACTS OF ALL SORTS MUST BE EVALUATED

Socioeconomic impacts are more than those easily quantifiable. Review should include:

Payment of increased utility personal property tax that can influence a local government's position on the project. This is an issue often raised historically by Xcel on proposing a project, but then, after a project is build and operating, Xcel has a history of doing everything it can, using every possible venue, to cut that tax, leaving local governments with a gutted revenue base and scrambling to make it up.

Impact of the project, if built, on landowners' property values and marketability.

Temporary and long-term loss of agricultural production, based on data from past transmission projects, must be included in analysis of socioeconomic impacts.

D. IMPACT ON VISUAL, AESTHETIC, AND USE AND ENOYMENT OF PROPERTY

The EIS must consider the visual and aesthetic impacts and detriments to use and enjoyment of property. This transmission project has impacts that threaten visual and aesthetics of specific properties and of communities. Impacts to specific landowners can also include loss of use and enjoyment of their land. Loss of use and enjoyment applies to those on greenfield routes and those on routes sharing existing Rights of Way here there would be an increase of impacts. Loss of use and enjoyment also applies to those threatened with a new or expanded corridor and route across their land, as it affects how they feel about their property and their future and also it affects whether their property is marketable and its marketability during and after review of the project and potential construction.

The EIS must consider these impacts particularly to those many landowners and communities making comments who have already been through this process with the threat or reality of construction of CapX 2020. The threat of these projects has a significant impact on those many landowners on the notice list, and those not included but affected.

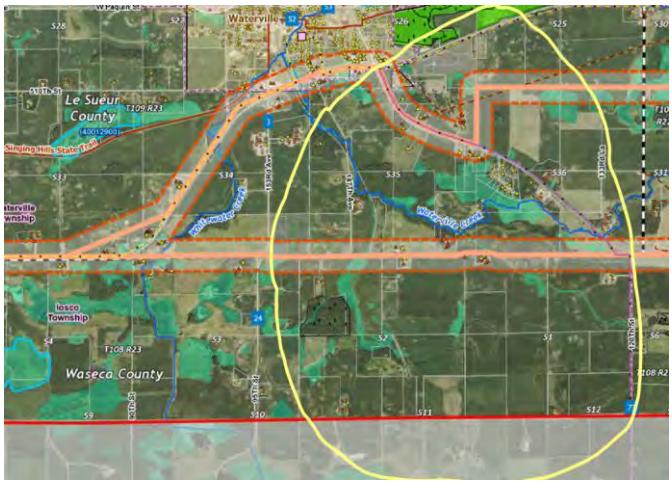
E. ENVIRONMENTAL IMPACTS OF GREENFIELD VERSUS SHARING RIGHT OF WAY MUST BE EVALUATED

The State of Minnesota has a "non-proliferation" policy, weighing towards sharing of right of way and using existing corridors. This policy of "non-proliferation" was established by People for Environmental Enlightenment and Responsibility (PEER) v. Minn. Environmental Quality Council, 266 N.W.2d 858 (Minn. 1978). The EIS must weigh impacts using the guidance provided in PEER.

F. THE EIS MUST ADDRESS THE RISKS AND WISDOM OF SITING TRANSMISSION OVER THE CENTERPOINT NATURAL GAS WELL.

The Xcel application was improperly accepted as complete. There is no mention of the massive underground storage facility under 13+ square miles centered on Hwy 13 just south of Waterville, north of Waseca**. No amendment has been made to the application disclosing this large energy infrastructure.**

The EIS must include identification of the portion of the proposed route and alignment that traverses a DNR permitted natural gas storage dome in the area depicted on the Map 8 of Segment 1. The EIS must also identify the two natural gas pipelines in Segment 1 that are deceptively referred to by Xcel as "hydrocarbon" pipelines. Application, page 201. This area circled in Segment 1, initial Map 8, must be removed from the proposed transmission route:



The Prehn family home and acreage has been in the family for over a century. It sits directly on top of the dome, across Highway 13 from the (now) CenterPoint pumping station and water treatment center. Their address is **43497 East Hwy. 13, Waseca, Minnesota 56093**, on Hwy. 13 between 430th and 440th. From the top of the map, their home is in the center between these east/west roads. Their driveway is in the woods between the 2nd and 3rd "13" on aerial map below, and a second access is seen across the north end of the field just south of their woods.

Prehns raised Xcel's omission of the natural gas storage dome in early comments, but the application has not been amended. Prehns also raised Xcel's transmission plan with the route going over the gas dome and CenterPoint staff at the site did not know of Xcel's plan. Xcel did inform CenterPoint of its plan in a May 1 2024 meeting. CenterPoint informed Xcel of locations of gas wells within Xcel's proposed transmission corridor. From Xcel's Reply Comment:

> With respect to identification of the underground natural gas storage and associated natural gas facilities in Project maps, publicly available pipeline and infrastructure data was used in the filed Application detailed maps in Appendix K.[8] The Applicant completed additional review and contacted CenterPoint for additional information of this storage site and will continue to work with CenterPoint on any mitigation measures that may be needed. The Company is providing a revised version of Segment 1, Map 8 from Appendix K as Attachment B to these Reply Comments to indicate the location of the CenterPoint facility. The Applicant notes that it has extensive experience working with natural gas companies and other pipeline companies on evaluating and implementing AC mitigation when transmission lines cross or are located parallel to pipelines, which is a relatively common occurrence throughout the system.

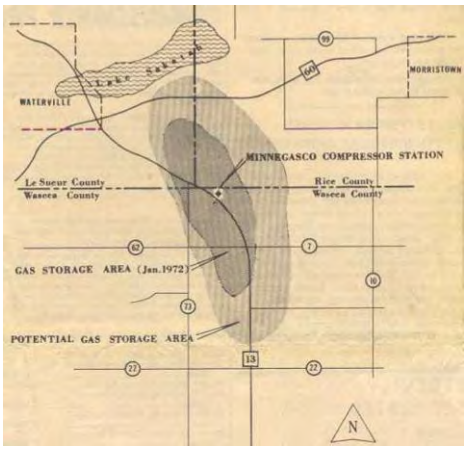
In its subsequent May 6, 2024, comment, Xcel stated:

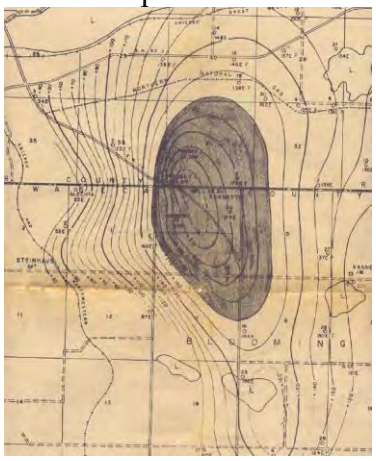
> The Company is aware of the CenterPoint underground gas storage facility and is coordinating with CenterPoint concerning the location of the Project and any necessary mitigation. The CenterPoint facility is used to store natural gas during the summer and to withdraw gas in the winter heating season with gas stored several hundred feet below ground in the Mount Simon Sandstone formation.
>
> On May 1, 2024, Company representatives met with CenterPoint staff to discuss the proposed Project and the CenterPoint facilities in this area. The proposed routes were discussed, as well as the 150 foot wide easement needed for the proposed 345 kV transmission line. The Company indicated that typical foundations for the proposed 345 kV transmission line structures range from 40-70 feet in depth, depending on site-specific soil and geologic conditions, and CenterPoint noted that these would have no impact on the underground storage facility, which is located several hundred feet underground.
>
> CenterPoint noted that the proposed Segment 1 South, Route Alternative 1L is near four wells associated with their facilities (see revised Segment 1, Map 8 attached to these Supplemental Comments which shows wells within 500 feet of the proposed centerline) and indicated that it requires a minimum clearance of 70 feet above each well for access and maintenance work. CenterPoint also noted that, while unlikely, transmission lines crossing over valve sites could experience flashing in the event of a natural gas venting release.
>
> The Company will continue to coordinate with CenterPoint to ensure that the proposed routes and transmission structures are adequately set back from the existing wells, valves, pipelines, and associated facilities to avoid any potential impacts. Additionally, the Company will work with CenterPoint to evaluate the need for potential AC mitigation.

May 1, 2024!! It's about time Xcel met with CenterPoint staff, informed them of this project, and learned about the wells and monitors dotting the countryside and potential impacts of transmission.

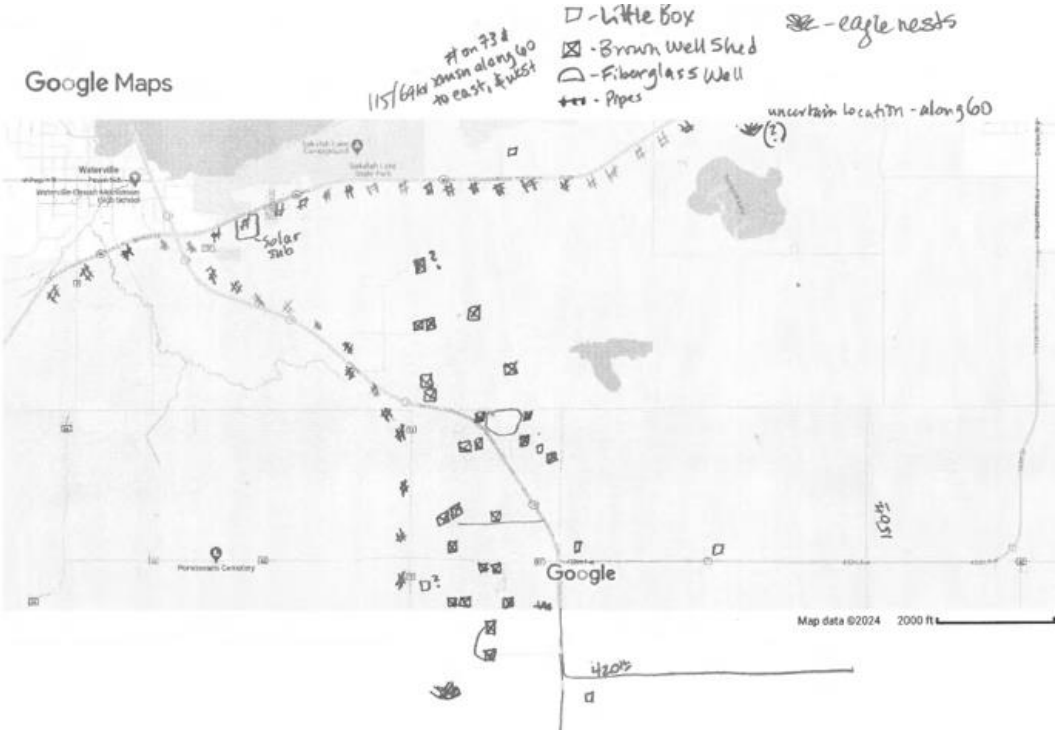
Xcel states that it has marked on its April 2024 revised map gas wells within 500 feet of the proposed line, identifying those wells with a black dot, but this writer cannot see any black dots on the map. Further, on April 2-24 Revised Segment 1 Map 8, there is no depiction of the extent of the natural gas storage dome, which is loosely represented by the yellow circle above and below. Xcel's revised map does show a large red dot at the CenterPoint office and water treatment plant along Highway 13, but again, that is just the office and water treatment facility, and not the gas dome. There is no depiction of the extent of the 13.25 square mile natural gas storage dome. By any measure, it's major infrastructure and should be shown on the map.

A map from the initial DNR permitting of the underground storage was included in the initial Prehn comment, and Xcel had the opportunity to review and mark it on its Segment 1 Map 8 map, and this was not done. These maps are from the mid-60s and 1972. The underground storage was expanded post 1972. I'd guess CenterPoint would provide a current map.



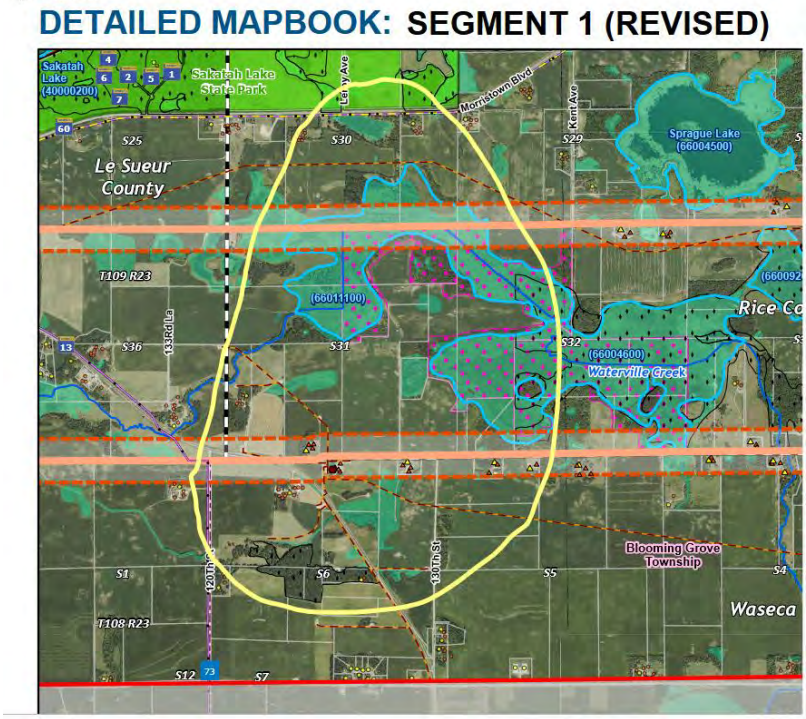


This, is the very rough map compiled by the Prehns in an afternoon of area reconnaisance:

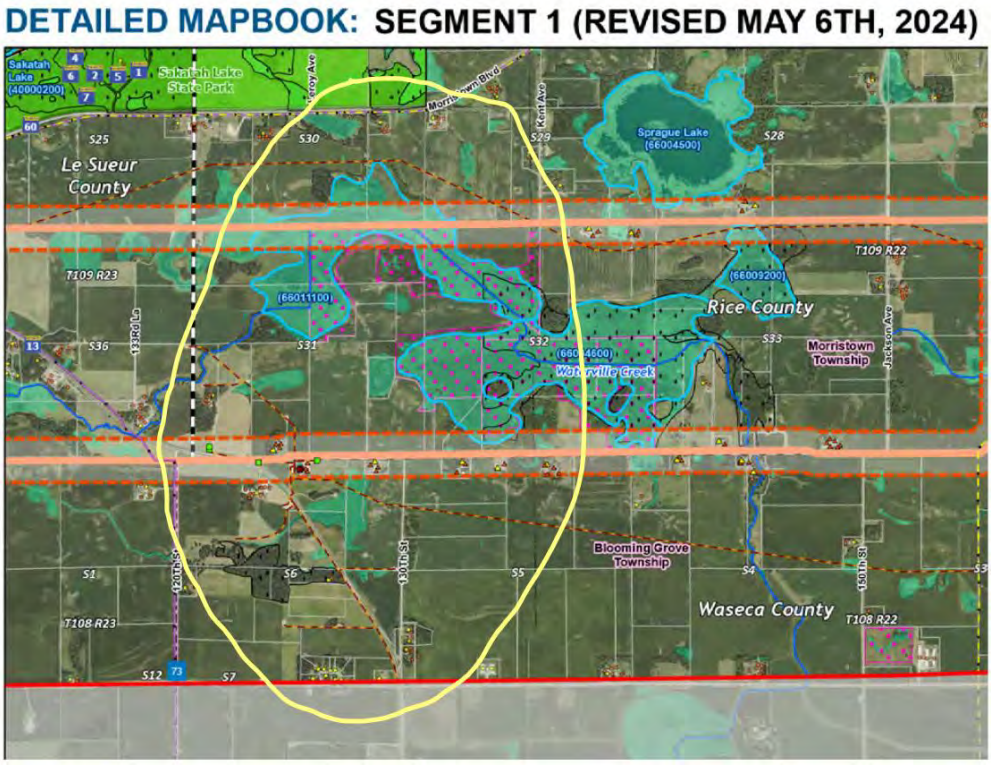


This is the Xcel's April 29, 2024 map with this writer's approximation of the dome boundary:

REVISED
April 29, 2024



The May 6 revised map does show wells with green squares, but there are no wells marked on the northerly route, and there may well be some there. Again, there's no depiction of the gas dome, again with this writer's rough approximation of the dome boundary:

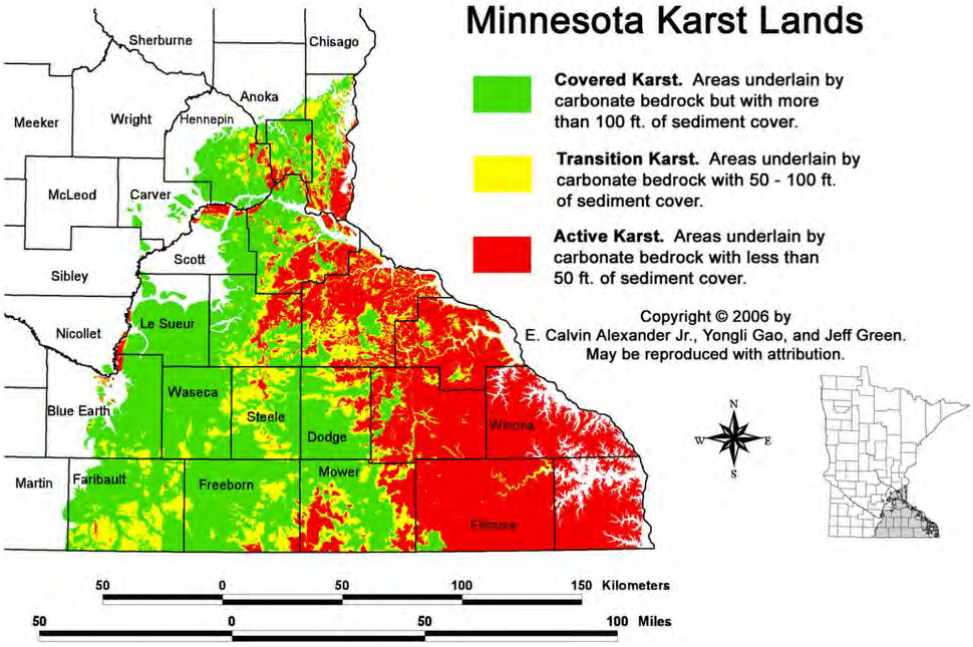


Because Xcel did not meet with CenterPoint until May 1, 2024, because it neglected to disclose the natural gas dome in its application, did not disclose wells in its first map revision, and has yet to show the extent of the natural gas dome in any of it maps, the Prehns, who have been living with this gas dome since the 60s, are not confident that Xcel recognizes the most basic facts of the gas dome, much less potential impacts. The Commission may "know all about it," but if so, should have known the application was incomplete without any mention of it, and should have required Xcel update its application. This should not be left for the evidentiary hearing.

The EIS, with the help of CenterPoint and the Prehn's map as guidance, must show the full extent of the CenterPoint natural gas dome on a map, the office and water treatment plant, and all of the wells and monitors in both of the routes, with particular designation for those wells and potentially affected areas and document its understanding of potential impacts.

G. ACTIVE KARST IS IN THE S.E. AREA PROPOSED FOR THIS PROECT

The EIS must map the active and transitional karst areas in the corridors where transmission structure foundations could be unstable[3].

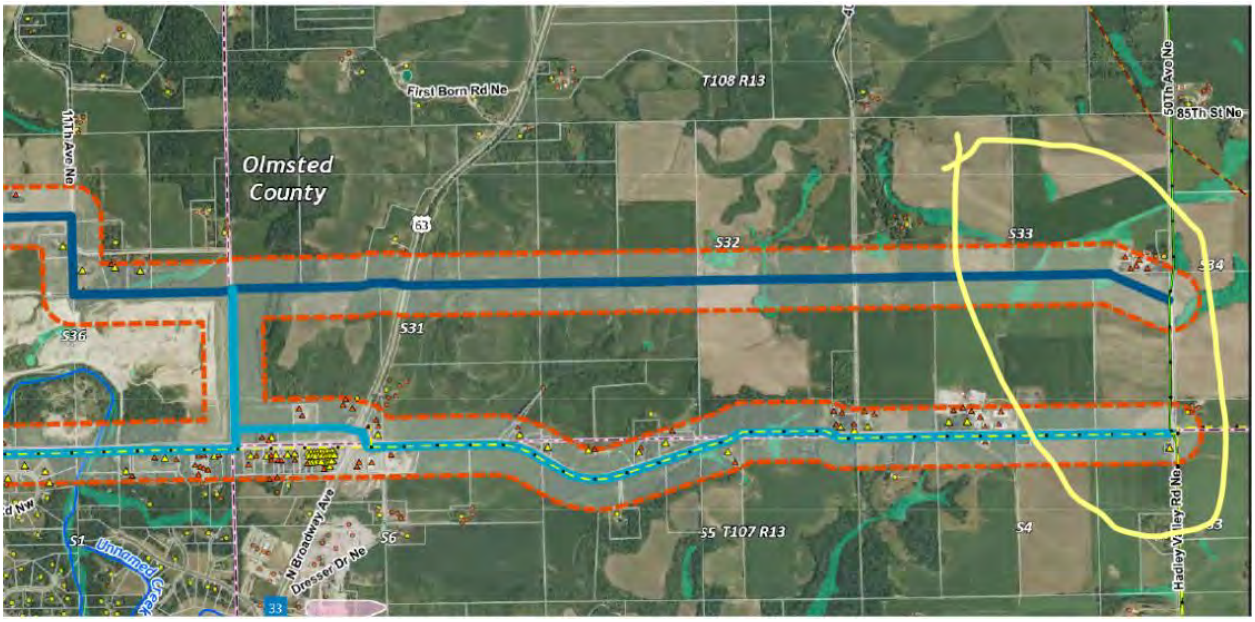


H. THE EASTERN ENDPOINT OF THE CHESTER LINE MUST BE DISCLOSED

The EIS must disclose where the eastern end of the project extends beyond what is shown on the maps, which is two routes/corridors stopping at Hadley Valley Road N.E./50th Avenue N.E. where there is no substation or terminus of any sort. How the project transitions beyond what is on that map may well have, should have, an impact on what route is chosen. If a route is chosen without regard for how the line is routed beyond the map, it will lock that eastern "beyond" section of the 161kV project into a route that is not feasible or not recommended. The

[3] https://stormwater.pca.state.mn.us/index.php?title=File:Minnesota_karst_lands.png

Commission cannot make an informed decision without the remainder of the 161kV project in the record.



I. SYSTEM AND ROUTE ALTERNATIVES OFFERED

At the Pine Island hearing on July 9, 2024, Steve Hackman, of the North Route Group, offered specific system and route alternatives for the Chester 161kV line which should be reviewed in the EIS.

It is my understanding that Mike Chase, of CFERS, will also offer route alternatives for Segment 2 along established corridors which should be reviewed in the EIS.

As a system alternative, the no-build option should be evaluated in consideration of the four transmission projects proposed, as above, and in light of the MVP 3, 4, and 5, heading eastward from southern Minnesota into Wisconsin.

As a system alternative, a lower voltage option should be reviewed based on Xcel's claimed peak system demand MVA of 718, Application page 162.

No CapX 2020 and the Prehn Family offer these scoping comments, and look forward to the Draft Environmental Impact Statement. We may offer additional scoping comments before the August 1, 2024 deadline.

Very truly yours,

Carol A. Overland

Carol A. Overland
Attorney for the Prehn Family and NoCapX 2020