



414 Nicollet Mall
Minneapolis, MN 55401

January 3, 2024

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101

—Via Electronic Filing—

Re: SCOPING COMMENTS
PROPOSED 345 kV BROOKINGS COUNTY – LYON COUNTY AND HELENA –
HAMPTON SECOND-CIRCUIT PROJECT
DOCKET NOS. E002/CN-23-200 (Certificate of Need); E002/TL-08-1474
(Minor Alteration)

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy (Xcel Energy or Company), submits these comments in response to the Commission's Notice of Public Information and Environmental Report Scoping Meetings issued in connection with the proposed 345 kilovolt (kV) Brookings County – Lyon County and Helena – Hampton Second-Circuit Project (Project). These comments correct information in the Minor Alteration application related to electric and magnetic fields (EMF). These comments also provide additional information in response to a question raised at the Lakeville scoping meeting regarding the CapX2020 Brookings Owners'¹ easement rights.

EMF Data Errata

Xcel Energy recently identified errors in the EMF data reported in Table 3-4 of the Minor Alteration application, which differed from the (correct) data in the EMF report included as Appendix B to the Minor Alteration application. Table 3-4 of the Minor Alteration application projected that, post-Project, the maximum milligauss (mG) at the edge of the right-of-way would be 73 mG for the Brookings County to Lyon County segment (Western Segment) and 72 mG for the Helena to Hampton segment (Eastern Segment). Table 3-4 should have stated that the maximum magnetic field at the edge of the right-of-way is projected to be 47 mG and 48 mG for the Western and Eastern Segments, respectively.

¹ In addition to Xcel Energy, the CapX2020 Brookings Owners are Central Minnesota Municipal Power Agency, Great River Energy, Otter Tail Power Company, and Western Minnesota Municipal Power Agency.

Table 3-4 also incorrectly stated that the maximum electric field at the edge of the right-of-way post-Project would be 0.8 kV per meter (kV/m) for the Western Segment and 0.5 kV/m for the Eastern Segment. To be consistent with the EMF report included as Appendix B, Table 3-4 should have stated that, post-Project, the maximum electric field at the edge of the right-of-way is projected to be 0.4 kV/m for both the Eastern and Western Segments.

The Company apologizes for these errors and appreciates the opportunity to correct the record. A corrected table is attached to these comments.

Brookings Line Easement Rights

At the Lakeville scoping meeting, a landowner inquired about the scope of the CapX2020 Brookings Owners' rights to remove trees outside the easement area. Representatives from Xcel Energy explained that, in certain situations, trees outside the right-of-way can pose a risk of falling on the transmission line. They also explained that the CapX2020 Brookings Owners may need to remove these trees to prevent them from falling on the transmission line. The Company later identified the specific easement language in the easements that allows the removal of so-called danger trees. The language provides, "Grantor hereby grants to Grantee . . . the right to trim or remove any trees that are located adjacent to the Easement Area which may interfere with or otherwise endanger the Electric Lines by falling thereon or by otherwise striking the Electric Lines." The Project requires no new easement rights; rights relative to danger trees adjacent to the easement area exist in the existing easements. The Company includes the easement language here to augment the record.

Please contact me at monsherra.s.blank@xcelenergy.com or (214) 422-3672 if you have any questions regarding this filing.

Sincerely,

/s/ Monsherra S. Blank

MONSHERRA S. BLANK
DIRECTOR, REGULATORY AND STRATEGIC ANALYSIS

c: Service Lists

Table 3-4 EMF Comparison from the Original Brookings Line to the Project

Route	Maximum at Edge Right-of-Way			
	Electric Field Magnitude (kV/m)		Magnetic Field Magnitude (milligauss)	
	2008	Proposed	2008	Proposed
Limit:	8 kV/m		9,040 mG [^]	
Brookings County to Lyon County	0.6	0.84	34.7	7347
Hampton to Helena	0.6	0.54	23.5	7248

CERTIFICATE OF SERVICE

I, Michaelle Rogers-Lesch, hereby certify that I have this day served copies or summaries of the foregoing documents on the attached list(s) of person.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States Mail at Minneapolis, MN

or

xx electronic filing

Docket Nos. 23-200 and 08-1474

Dated this 3rd day of January 2024

/s/ Michaelle Rogers-Lesch

Legal Assistant to Brian Bell

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Robert	Bauer	rbauer@dmsbh.com	Dougherty, Molenda, Solfest, Hills, & Bauer P.A.	14985 Glazier Ave Suite 525 Apple Valley, MN 55124	Electronic Service	No	OFF_SL_8-1474_08-1474
Brian	Bell	bell.brian@dorsey.com	Dorsey & Whitney LLP	50 South Sixth St. Suite 1500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_8-1474_08-1474
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_8-1474_08-1474
Michael	Drysdale	Drysdale.michael@dorsey.com	Dorsey & Whitney LLP	50 South Sixth Street, Suite 1500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_8-1474_08-1474
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	Yes	OFF_SL_8-1474_08-1474
Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S. Eighth Street Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_8-1474_08-1474
Carrie	Jennings			8919 280th Street West Northfield, MN 55057	Paper Service	No	OFF_SL_8-1474_08-1474
Robert and Patricia	Johnson			3940 220th Street East Hampton, MN 55031	Paper Service	No	OFF_SL_8-1474_08-1474
Michael	Klemm	KlemmM@seversonsheldon.com	Severson, Sheldon, Dougherty & Molenda, P.A	7300 West 147th St Ste 600 Apple Valley, MN 55124	Electronic Service	No	OFF_SL_8-1474_08-1474
Stacy	Kotch Egstad	Stacy.Kotch@state.mn.us	MINNESOTA DEPARTMENT OF TRANSPORTATION	395 John Ireland Blvd. St. Paul, MN 55155	Electronic Service	No	OFF_SL_8-1474_08-1474

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Phillip	Krass	prk@mgmlp.com	Malkerson Gunn Martin LLP	1900 US Bank Plaza 220 South Sixth Street Minneapolis, MN 55402	Paper Service	No	OFF_SL_8-1474_08-1474
Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_8-1474_08-1474
Brent	Larson	N/A		25755 Xerxes Avenue Elko-New Market, MN 55020	Paper Service	No	OFF_SL_8-1474_08-1474
Joyce H.	Osborn			PO Box 1165 Burnsville, MN 55337	Paper Service	No	OFF_SL_8-1474_08-1474
Jeff	Otto			25580 Dodd Road Lakeville, MN 55044	Paper Service	No	OFF_SL_8-1474_08-1474
Carol A.	Overland	overland@legalectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_8-1474_08-1474
Pamela J.	Rasmussen	pamela.jo.rasmussen@xcelenergy.com	Xcel Energy	PO Box 8 1414 West Hamilton Avenue Eau Claire, WI 54701	Electronic Service	No	OFF_SL_8-1474_08-1474
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_8-1474_08-1474
Margaret	Rheude	Margaret_Rheude@fws.gov	U.S. Fish and Wildlife Service	Twin Cities Ecological Services Field Office 4101 American Blvd. E. Bloomington, MN 55425	Electronic Service	No	OFF_SL_8-1474_08-1474

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Randy	Schroeder	N/A		33763 327th Ave Morgan, MN 56266	Paper Service	No	OFF_SL_8-1474_08-1474
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_8-1474_08-1474
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_8-1474_08-1474
Zeviel	Simpser	simpser.zev@dorsey.com	Dorsey & Whitney LLP	50 South Sixth Street Suite 1500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_8-1474_08-1474
Bev	Topp	eurekatopp@gmail.com	Citizens' Energy Task Force	26045 Ipava Ave West Lakeville, MN 55044	Electronic Service	No	OFF_SL_8-1474_08-1474
Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources	500 Lafayette Road Box 25 St. Paul, MN 55155-4040	Electronic Service	No	OFF_SL_8-1474_08-1474

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Sarah	Beimers	sarah.beimers@state.mn.us	Department of Administration - State Historic Preservation Office	50 Sherburne Avenue Suite 203 St. Paul, MN 55155	Electronic Service	No	OFF_SL_23-200_CN-23-200
Brian	Bell	bell.brian@dorsey.com	Dorsey & Whitney LLP	50 South Sixth St. Suite 1500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-200_CN-23-200
David	Bell	david.bell@state.mn.us	Department of Health	POB 64975 St. Paul, MN 55164	Electronic Service	No	OFF_SL_23-200_CN-23-200
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_23-200_CN-23-200
Randall	Doneen	randall.doneen@state.mn.us	Department of Natural Resources	500 Lafayette Rd, PO Box 25 Saint Paul, MN 55155	Electronic Service	No	OFF_SL_23-200_CN-23-200
Michael	Drysdale	Drysdale.michael@dorsey.com	Dorsey & Whitney LLP	50 South Sixth Street, Suite 1500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-200_CN-23-200
Kate	Fairman	kate.frantz@state.mn.us	Department of Natural Resources	Box 32 500 Lafayette Rd St. Paul, MN 551554032	Electronic Service	No	OFF_SL_23-200_CN-23-200
Annie	Felix Gerth	annie.felix-gerth@state.mn.us		Board of Water & Soil Resources 520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	OFF_SL_23-200_CN-23-200
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_23-200_CN-23-200
Todd	Green	Todd.A.Green@state.mn.us	Minnesota Department of Labor & Industry	443 Lafayette Rd N St. Paul, MN 55155-4341	Electronic Service	No	OFF_SL_23-200_CN-23-200

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kari	Howe	kari.howe@state.mn.us	DEED	332 Minnesota St, #E200 1ST National Bank Bldg St. Paul, MN 55101	Electronic Service	No	OFF_SL_23-200_CN-23-200
Ray	Kirsch	Raymond.Kirsch@state.mn.us	Department of Commerce	85 7th Place E Ste 500 St. Paul, MN 55101	Electronic Service	No	OFF_SL_23-200_CN-23-200
Chad	Konickson	chad.konickson@usace.army.mil	U.S.Army Corps of Engineers	180 5th St # 700 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_23-200_CN-23-200
Stacy	Kotch Egstad	Stacy.Kotch@state.mn.us	MINNESOTA DEPARTMENT OF TRANSPORTATION	395 John Ireland Blvd. St. Paul, MN 55155	Electronic Service	No	OFF_SL_23-200_CN-23-200
Dawn S	Marsh	dawn_marsh@fws.gov	U.S. Fish & Wildlife Service	Minnesota-Wisconsin Field Offices 4101 American Blvd E Bloomington, MN 55425	Electronic Service	No	OFF_SL_23-200_CN-23-200
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_23-200_CN-23-200
Stephan	Roos	stephan.roos@state.mn.us	MN Department of Agriculture	625 Robert St N Saint Paul, MN 55155-2538	Electronic Service	No	OFF_SL_23-200_CN-23-200
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_23-200_CN-23-200
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_23-200_CN-23-200
Zeviel	Simpser	simpser.zev@dorsey.com	Dorsey & Whitney LLP	50 South Sixth Street Suite 1500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-200_CN-23-200

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jayme	Trusty	execdir@swrdc.org	SWRDC	2401 Broadway Ave #1 Slayton, MN 56172	Electronic Service	No	OFF_SL_23-200_CN-23-200
Jen	Tyler	tyler.jennifer@epa.gov	US Environmental Protection Agency	Environmental Planning & Evaluation Unit 77 W Jackson Blvd. Mailstop B-19J Chicago, IL 60604-3590	Electronic Service	No	OFF_SL_23-200_CN-23-200
Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources	500 Lafayette Road Box 25 St. Paul, MN 55155-4040	Electronic Service	No	OFF_SL_23-200_CN-23-200
Alan	Whipple	sa.property@state.mn.us	Minnesota Department Of Revenue	Property Tax Division 600 N. Robert Street St. Paul, MN 551463340	Electronic Service	No	OFF_SL_23-200_CN-23-200
Jonathan	Wolfgram	Jonathan.Wolfgram@state.mn.us	Office of Pipeline Safety	445 Minnesota St Ste 147 Woodbury, MN 55125	Electronic Service	No	OFF_SL_23-200_CN-23-200