



414 Nicollet Mall
Minneapolis, MN 55401

November 27, 2019

Daniel Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

—Via Electronic Filing—

Re: APPLICATION FOR MINOR ALTERATION OF THE XCEL ENERGY 500 kV
TRANSMISSION LINE 5702 NEAR CHISHOLM, MN

Dear Mr. Wolf:

Northern States Power Company, a Minnesota corporation (Xcel Energy or the Company) is electronically filing this request to the Minnesota Public Utilities Commission for a minor alteration authorization in compliance with Minnesota Rule (Minn. R.)7850.4800. The minor alteration consists of rerouting approximately 3 miles of the existing Xcel Energy 500 kilovolt (kV) Transmission Line 5702, which is currently in or near the expansion area of the Hibbing Taconite Mine (Attachment A, Figure 1). The Hibbing Taconite Company (HibTac) has notified Xcel Energy that the transmission line must be moved to enable HibTac to continue the eastward expansion of their existing mine pit.

A. Applicable Law and Analysis

The 500 kV Transmission Line 5702 was permitted by the Minnesota Environmental Quality Council in 1977 (Docket No. NSP-TR-1). The Construction Permit is attached (Attachment B).

A minor alteration is defined as a change in a high voltage transmission line that does not result in significant modifications to the human or environmental impacts of a facility that is subject to the Power Plant Siting Act (Minn. Stat. 216E). A company requesting a minor alteration is required to submit an application for the proposed action to the Commission (Minn. R. 7850.4800, Subp. 2). Per Minn. Stat. 216B.243, Subd. 8.(4), this Project is exempt from the Certificate of Need approval

process as it is not a new high voltage transmission line, rather it is a relocation of an existing transmission line. The Commission is authorized to approve a minor alteration after providing, “at least a ten-day period for interested persons to submit comments on the application or to request that the matter be brought to the Commission for consideration” (Minn. R. 7850.4800, Subp.2).

B. Project Description

The Project is located southwest of the City of Chisholm, St. Louis County, Minnesota. Transmission line 5702 travels from the Canadian border near the City of Warroad to the Chisago County Substation, and passes between the City of Chisholm and the existing Hibbing Taconite Mine (Attachment A, Figure 1). The Minnesota portion of Transmission line 5702 is approximately 250 miles long.

Xcel Energy is proposing to relocate an approximately 3.0-mile segment of the transmission line in an area where the line will interfere with HibTac’s planned mining operations (Attachment A, Figure 2). The existing transmission line was built on right-of-way (ROW) authorized by a license agreement rather than an easement. The license agreement includes provisions that the Company would move the transmission line if requested by licensor. On January 15, 2017 HibTac formally requested that the Company remove the line from six parcels to allow expansion of the HibTac Mine. Table 1 provides the Section, Township, and Range of the six requested parcels.

Table 1. Section, Township, Range of Parcels to be Removed

County	Township	Range	Section	Quarter Section(s)
St. Louis	58 N	20W	29	SW ¼ of NW ¼
			29	NW ¼ of SW ¼
			29	SE ¼ of SW ¼
			30	NW ¼ of NE ¼
			30	SE ¼ of NE ¼
			32	NE ¼ of NW ¼
			32	NE ¼ of SE ¼ (portion southwest of Hwy 169)

Xcel Energy originally acquired land rights across the Mesabi Iron Range in the form of a license agreement rather than a perpetual easement because a permanent easement would prevent access to minerals lying below and adjacent to the ROW. The cost of an easement would include the value of underlying minerals and was judged to be far more costly than moving the transmission line if such a move was ever necessary. Xcel Energy expects a similar license agreement would be used for the ROW on the new route.

The Project will remove 16 steel lattice towers which will be replaced by 13 new lattice towers and 2 tubular steel structures, one at each end of the re-route. Right-of-way for the new section of line will be uniform with the existing line with a width of 200 feet. The proposed towers will be 130 to 140 feet tall and be spaced approximately 450 to 1,690 feet apart.

C. Route Development

After learning of the need to move the transmission line, Xcel Energy assembled a stakeholder group consisting of the following entities:

- Minnesota Department of Natural Resources (DNR)
- St. Louis County
- Hibbing Taconite
- Minnesota Discovery Center
- Minnesota Department of Transportation (MnDOT)
- Iron Range Resources and Rehabilitation Board (IRRRB)
- City of Chisholm
- Various mineral rights owners and agents

Stakeholders were engaged in a series of meetings over a period of two years where various routes were considered and refined. Twelve different routes were proposed and modified to avoid and minimize impacts to natural resources, existing infrastructure, future mining operations, existing land use and tourism. Details of the route development process are presented in Attachment C.

Route options are limited particularly at the location between the expanding mine and The Minnesota Discovery Center. Issues in this area included the presence of Highway 169, the need for the mine to maintain a blasting zone and the proximity of the Minnesota Discovery Center Campus. Due to these constraints, the proposed route could not avoid some aesthetic impacts to the Minnesota Discovery Center and new mountain bike trails currently under construction. Photo simulations developed to assess aesthetic impacts are presented in Attachment D. To mitigate for impacts to the Minnesota Discovery Center, Xcel Energy negotiated with the IRRR (Minnesota Discovery Center landowner) and entered into a Memorandum of Understanding (MOU) with the provision to provide a mitigation fund to the IRRR.

Other owners of land and minerals along the proposed route were also engaged in the routing process. All these owners are in the process of negotiating easement agreements for the proposed route. All landowners have accepted the need for the Project and the proposed route. Current ROW acquisition is summarized in the following section.

D. Land ownership

The Project will affect a total of 14 individual parcels (Attachment A, Figure 3). Mineral rights in these parcels are owned by 19 parties. Stockpiles present on 8 parcels are owned by 23 parties. A summary of ownership is presented below in Table 2.

Xcel has approached all listed owners and has begun discussions for license agreements. All landowners have agreed, in principle with the proposed route and/or have signed an option agreement. Xcel will continue to work with all landowners to acquire license agreements for the proposed reroute. A copy of this filing is being prepared for each of the affected landowners.

Table 2. Land License Agreement Status

Parcel	Land Owner	Minerals Rights Owner	Status (Contacted, Negotiating Draft Agreement, Signed Agreement)
1	State of Minnesota Iron Range Resources and Rehabilitation Board (IRRRB)	<ul style="list-style-type: none"> • Cliffs Mining • Pickands Hibbing Corp 	Have reached agreement on route; easement documents being prepared.
2	State of Minnesota IRRRB	<ul style="list-style-type: none"> • Day Development Company • G&N RY Co. (BNSF) • State of Minnesota C278L35 	Have reached agreement on route; easement documents being prepared.
3	State of Minnesota IRRRB Oliver Mining c/o McClintock Mining Company	LTV Steel Company	Have reached agreement on route; easement documents being prepared for both the IRRRB and St. of MN parcels.

Parcel	Land Owner	Minerals Rights Owner	Status (Contacted, Negotiating Draft Agreement, Signed Agreement)
4	State of Minnesota C278 L35	State of Minnesota C278 L35	Have reached agreement on route; easement documents being prepared.
5	State of Minnesota IRRRB	State of Minnesota IRRRB	Have reached agreement on route; easement documents being prepared.
6	Superior Mineral Resources LLC	Superior Mineral Resources LLC	Option agreement for easement signed and received.
7	State of Minnesota IRRRB	<ul style="list-style-type: none"> • Torreano Minerals LLC • Snyder, John P Jr. et al 	Have reached agreement on route; easement documents being prepared.
8	State of Minnesota IRRRB	State of Minnesota IRRRB	Have reached agreement on route; easement documents being prepared.
9	RGGS LAND & MINERALS LTD LP	RGGS Land & Minerals LTD LP	Option agreement for easement signed and received.
10	Hibbing Land Corp	<ul style="list-style-type: none"> • State of Minnesota C278 L35 • Phillip W. Pillsbury, et al • Isobel R. Gale, et al 	Have reached agreement to modify existing easements; documents in review.
11	Robert Koschak, Karol and William Tyson, and Estate of Edward Koschak	<ul style="list-style-type: none"> • Phillip W. Pillsbury, et al • Isobel R. Gale, et al 	Have reached agreement in principle; working with owners to clear a title defect.
12	Cliffs Mining Company	<ul style="list-style-type: none"> • Bridger Mgmt. Company • GaleMineralsLLC • Ballantine Properties, LLC 	Have reached agreement to modify existing easements; documents in review.

Parcel	Land Owner	Minerals Rights Owner	Status (Contacted, Negotiating Draft Agreement, Signed Agreement)
		<ul style="list-style-type: none"> • MCG Properties, LLC 	
13	RGGS Land & Minerals LTD LP	<ul style="list-style-type: none"> • Mary Bell Whitt Fishel, Trustee • Margaret Van Meter, et al • Lansill Cary Scott GST Exempt Trust • VM Partnership LLLP • Willington B. Hay Jr. Trust FBO Stephen Taylor Hay • Lansill Clay Burt GST Exempt Trust • State of Minnesota • RGGS Land & Minerals LTD LP 	Option agreement for easement signed and received.
14	Hibbing Land Corp	RGGS Land & Minerals LTD LP	Have reached agreement to modify existing easements; documents in review.

E. Agency Coordination

On March 28, 2019 the Company sent letters to the U.S. Army Corps of Engineers (USACE), U.S. Fish and Wildlife Service (USFWS), and DNR to formally ask for comments and input regarding the proposed reroute. The letter to each agency included a Project summary, location map, and a request for formal comments on the Project (Attachment E). The letter to the USACE included a summary of the potential wetlands, waterbodies, and designated floodplains within the Project area. The USFWS letter included a description of potential impacts to listed threatened and endangered species within St. Louis County. The DNR letter included the Natural Heritage Information System (NHIS) data request and a request of potential land use issues.

USACE

No written response was received from USACE. Xcel Energy contacted the Regional Project Manager from USACE and described the Project, routing and potential wetland impacts. Based on this conversation, the Regional Project Manager indicated that the Project would likely be approved under a Regional General Permit. Xcel Energy will submit a pre-construction notice and continue to coordinate with USACE on any permit conditions.

DNR

The DNR responded to the Company's NHIS request on April 30, 2019. DNR's response listed one state-listed threatened species and three state-listed species of special concern that may be located within the Project area. DNR stated that a botanical survey for these state-listed species should be conducted by a qualified surveyor prior to construction, and the surveys should follow appropriate survey protocols.

The DNR also sent a letter on May 9, 2018 and provided information and recommendations regarding rare plants, installation of bird diverters, wetlands, vegetation and routing. DNR provided two route options to study.

A conference call was held on May 20, 2019 with the Company and representatives from DNR staff from the Hibbing Minerals office, the DNR Regional Environmental Assessment Ecologist and the DNR Energy Projects Planner. The routing process and stakeholder concerns were described during this call as well as the background and possible future of mining in the area.

A follow-up letter from DNR was sent on September 19, 2019. This follow up letter indicated that the DNR supported the proposed route and recommended continued coordination regarding rare and unique resources, flight diverter locations, and a crossing of a public water. All three of the DNR letters are included in Attachment E.

Xcel Energy completed the rare plant survey and submitted it to DNR on October 24th, 2019. No threatened or endangered plant species were found in the Project area.

MnDOT

MnDOT was consulted throughout the route development process. The Project must cross Highway 169. The net effect of the proposed Project would be to remove an existing Highway 169 crossing and construct a new one. MnDOT's

concerns focused on the configuration of the new crossing. A crossing close to perpendicular is preferred by MnDOT. MnDOT objected to Option 6 due to its near-parallel angle and indicated that it was not permissible. The proposed Project configuration at Highway 169 was reviewed by MnDOT and found to be satisfactory. Correspondence regarding MnDOT’s comments is included in Attachment E.

USFWS

The USFWS responded to Xcel Energy’s letter on December 3, 2018. The USFWS response provided a list of federally threatened, endangered, proposed and candidate species that may occur in the Project area. The species list included three mammals and one bird. None of which are expected to be affected by the proposed Project.

E. Project Impacts

Table 4 provides a summary of the environmental impacts of the proposed minor alteration, followed by a discussion of these potential impacts.

Table 4: Project Impact Summary

Criteria	Units	New Alignment and ROW (200 feet)	Additional Information	Source
Proposed Infrastructure				
Length of Transmission Line	Feet (miles)	15,117.40 (2.86)	No additional information.	Xcel Energy 2019
Length that is within or Parallel to Existing Rights-of-Way	Feet (miles)	0	No additional information.	Desktop Review
Number of Roads Crossed	Number	3	No additional information.	St. Louis County 2019
Number of Parcels Crossed	Number	14	No additional information.	Xcel Energy and St Louis County
Structures				
Number of Residences within 1,000 feet	Number	0	No additional information.	Desktop Review
Number of Non-Residential Buildings	Number	0	No additional information.	Desktop Review

Criteria	Units	New Alignment and ROW (200 feet)	Additional Information	Source
Land Cover				
Area of Agricultural Land Crossed	Acres	0	Minnesota Land Cover Classification and Impervious Surface Area by Landsat and Lidar: 2013 update - Version 2 – Row Crops	Remote Sensing and Geospatial Analysis Laboratory, University of Minnesota
Area of Forested Land Crossed	Acres	55.1	Minnesota Land Cover Classification and Impervious Surface Area by Landsat and Lidar: 2013 update - Version 2 – deciduous forest, Conifer forest, Mixed forest	Remote Sensing and Geospatial Analysis Laboratory, University of Minnesota
Area of Open Land Crossed	Acres	1.8	Minnesota Land Cover Classification and Impervious Surface Area by Landsat and Lidar: 2013 update - Version 2 – Managed Grass, Natural Grass	Remote Sensing and Geospatial Analysis Laboratory, University of Minnesota
Area of Developed Land Crossed	Acres	5.1	Minnesota Land Cover Classification and Impervious Surface Area by Landsat and Lidar: 2013 update - Version 2 – Impervious (Roads, parking lots, building rooftops)	Remote Sensing and Geospatial Analysis Laboratory, University of Minnesota
Area of Wetlands Crossed	Acres	12.8	Field determined wetlands	Tetra Tech 2018 and 2019
Area of Permanent Wetland Impact	Acres	Less than 0.01	Field determined wetlands	Tetra Tech 2018 and 2019
Area of Forested Wetland Clearing	Acres	0.1	Field determined wetlands	Tetra Tech 2018 and 2019
Transmission Line Distance across a Lake, Stream, Drainage, or Other Waterway	Feet	0.0	No additional information.	Public Waters Inventory (2016)
		0.0	Field determined waterways	Tetra Tech 2018 and 2019

Criteria	Units	New Alignment and ROW (200 feet)	Additional Information	Source
Conservation and Recreation Lands				
Wildlife Management Areas	Acres	0	No additional information.	DNR 2018
National Wildlife Refuges	Acres	0	No additional information.	USFWS 2018
Waterfowl Production Areas	Acres	0	No additional information.	USFWS 2018
State Wildlife Refuges	Acres	0	No additional information.	DNR 2018
County Parks and Trails	Acres	0	No additional information.	St Louis County 2019
Mineral Resources				
Mineral Resources	Acres	70.1	ROW entirely within Mesabi Iron Range	DNR 2011
Metal Mining Resources	Acres	70.1	ROW entirely within Mesabi Iron Range	DNR 2011
Sensitive Natural Resources				
Native Plant Communities	Acres	0	No additional information.	DNR 2019
Railroad ROW Prairie	Acres	0	No additional information.	DNR 2017
Sites of Biodiversity Significance	Acres	0	No additional information.	DNR 2019
Number Known Federally Endangered or Threatened Species	Number of Species	4	No adverse impacts to federally listed species are anticipated.	USFWS 2018
Number of state listed rare species or significant natural features	Number of Species	0	DNR recommended botanical surveys within the ROW prior to construction. Barr Engineering completed a botanical survey in June 2019 and found no state listed vascular plant species.	Barr Engineering Survey 2019
Known Cultural Resources				
National Register Historic Places	Number	0	No additional information.	National Park Service 2019

Criteria	Units	New Alignment and ROW (200 feet)	Additional Information	Source
Inventoried Historic Resources	Number	0	No additional information.	Tetra Tech 2019
Inventoried Archeological Sites	Number	0	No additional information.	Tetra Tech 2019

E.1 Physical Description of Project Area

The Project area is located within the Nashwauk Uplands subsection of the Norther Superior Uplands Section of the Laurentian Mixed Forest Province, which are characterized by rolling till plains and moraines and flat outwash plains. The most prominent landscape feature is the Mesabi Iron Range. In the Project area, this is an approximate 3-mile-wide geologic formation that has been intensively modified by mining activity. The formation is characterized by mine pits, stockpiles and tailings basins.

The Project area is primarily a reforested area, comprised of previously mined areas, roadways, railroads, logging, or other development activities. Several wetlands and ponds are located within the Project area, although many of these wetlands appear to be originally excavated as part of mining activities.

E.2 Description of Field and Desktop Studies

Xcel Energy contracted with Tetra Tech to conduct field determinations for wetlands and waterways, complete preliminary analysis of biological resources, and both desktop and field studies for cultural resources.

Tetra Tech conducted a rare species review for the Project to provide the Company with a preliminary analysis of those potential existing biological resources on and in the vicinity of the Project area that may preclude, constrain, or otherwise affect development of the Project. Based on MNDNR’s request, a rare plant survey was conducted for the project corridor. No rare plants were identified and a copy of the report was submitted to MNDNR for review.

Wetland field determinations were also conducted on October 24 and 25, 2018 and September 18, 2019. Results of the field determinations identified 12.8 acres of wetlands within the Project ROW. The identified wetlands were characterized as

palustrine emergent; palustrine forested; palustrine scrub/shrub; and palustrine unconsolidated bottom.

Tetra Tech conducted a file review of files received from the Minnesota State Historic Preservation Office (SHPO) on November 9, 2018 and a review of previous investigations archived at SHPO from January 24, 2019. The file review failed to identify any previously recorded archaeological resources or any previously recorded architectural properties within the Project area. Xcel Energy will continue to coordinate with SHPO regarding cultural resources.

E.3 Description of Impacts

Proposed Infrastructure

The Project infrastructure will include approximately 3.0 miles of 500 kV transmission line within a new 200-foot-wide ROW. The Project crosses three roads; State Highway 5, 6th Street SW, and State Highway 73/Highway 169. The Project crosses 14 land parcels.

Structures

There are no residences within 1,000 feet of the new ROW. The proposed route passes near a trolley barn on the discovery center campus. No impacts to the trolley barn or trolley operations are anticipated.

Land Cover

Land cover data were derived from the University of Minnesota's Remote Sensing and Geospatial Analysis Laboratory. There are no agricultural lands crossed by the Project ROW. The Project ROW crosses 55.1 acres of forested land, 1.8 acres of open land, and 5.1 acres of developed land (e.g., roads, parking lots, building rooftops).

According to the DNR Public Waters Inventory, no public waterways are crossed by the Project ROW. Field determinations identified 12.8 acres of wetlands and no waterways crossed by the Project ROW.

Conservation and Recreation Lands

There are no Wildlife Management Areas, National Wildlife Refuges, Waterfowl Production Areas, State Wildlife Areas, County or Local Parks or Trails located within the Project ROW.

Mineral Resources

There are 70.1 acres of mineral and metal mining resources within the Project ROW, which is located entirely within the Mesabi Iron Range.

Sensitive Natural Resources

According to the Minnesota Biological Survey for St. Louis County, there are no records of Native Plant Communities or Railroad ROW Prairies with the Project area. There are no DNR sites of biodiversity significance. Four federally listed animal species are located within St. Louis County, but no adverse impacts are anticipated from Project activities. DNR identified four rare or significant plant species as potentially located within the Project area. Xcel Energy contracted with Barr Engineering to complete a botanical survey for the Project in June 2019. The survey found no protected plant species within the Project.

Known Cultural Resources

No previously documented archaeological sites or listed National Register Historic Properties are located within the Project ROW. One inventoried historic resource, the Pillsbury Mine Overlook, was identified by SHPO outside the Project ROW. No historic properties were identified within one mile of the Project ROW. Xcel Energy will continue coordinating with SHPO to assure cultural resources are sufficiently addressed.

F. Assessment of Project Impacts

After a thorough examination and working with stakeholders in the Project area, Xcel Energy has designed the Project to not result in significant changes to the human and environmental impacts of the existing Transmission Line 5702. An evaluation of the impacts of the Project relative to the routing factors found in Minn. R. 7850.4100 can be found in Table 5 below.

Table 5: Assessment of Impacts of Requested Alignment.

Routing Factor: Minn. R. 7850.1900 Subp. 3 and Minn. R. 7850.4100	Impact Regarding Alignment and ROW Change Requested
Effects on human settlement, including, but not limited to displacement, noise, aesthetics, cultural values, recreation and public services.	No impacts to human settlement are anticipated. No displacement will be required. Noise levels will be below state standards. Effects to the Minnesota Discovery Center are minimized through careful siting and structure placement. A mitigation agreement is in place for unavoidable impacts to the Minnesota Discovery Center. Impacts to the region’s cultural values and aesthetics are minimized by minimizing the length of the re-route and moving the route away from Highway 169.

Routing Factor: Minn. R. 7850.1900 Subp. 3 and Minn. R. 7850.4100	Impact Regarding Alignment and ROW Change Requested
Effects on Public Health and Safety	No impacts to public health and safety are anticipated. No safety concerns exist with the construction or operation of this line.
Effects on land-based economies, including, but not limited to agriculture, forestry, tourism and mining.	Construction of the Project allows the HibTac Mine to continue expanding to the east. Impacts to the Minnesota Discovery Center were addressed in a MOU. No other affects to land based economies are anticipated.
Effects on archaeological and historic resources.	No archaeological or historic resources have been documented within the Project ROW. Xcel Energy will continue to coordinate with SHPO on cultural resources
Effects on the natural environment, including effects on air and water quality resources and flora and fauna.	No impacts to the natural environment are anticipated. Project will cross approximately 12.8 acres of wetlands and no waterbodies. Permanent wetland impacts would be limited to structure footings and would be minimal.
Effects on rare and unique natural resources.	Xcel Energy coordinated with DNR regarding results of rare plant surveys and determined no state listed plant species were present within the Project area. The proposed Project is within the action area of four federal listed animal species. Impacts to one of these species (the Northern Long Eared Bat) can be avoided by clearing trees outside of its pup rearing season. Habitat for the remaining three species are not located within Project area.
Application of design options that maximize energy efficiencies, mitigate adverse environmental effects, and could accommodate expansion of transmission or generating capacity.	The Project has been designed to maximize energy efficiency by selecting the shortest feasible alternative given the other siting requirements to avoid any environmental effects. No mitigation will be required.
Use or paralleling of existing ROW, survey lines, natural division lines, and agricultural field boundaries.	The Project was designed to avoid interference with existing and potential future mining. Following existing features was not possible due to the presence of stockpiles, the Minnesota Discovery Center, existing and future mining areas.
Use of existing large electric power generating plant sites.	Not applicable to current Project.

Routing Factor: Minn. R. 7850.1900 Subp. 3 and Minn. R. 7850.4100	Impact Regarding Alignment and ROW Change Requested
Use of existing transportation, pipeline, and electrical transmission systems rights-of-way.	The Project was not able to use existing ROWs to meet the purpose and need of the Project.
Electrical system reliability.	The Project will support reliable transmission of electricity.
Cost of constructing, operation and maintenance which are dependent on design and route.	The anticipated cost to construct the Project is approximately \$15 million.
Human and natural environmental effects that cannot be avoided.	Any human and environmental effects associated with the Project are described in Table 5 and are not significant in nature.
Irreversible and irretrievable commitments of resources.	No irreversible or irretrievable commitments of resources are anticipated as part of this Project, as the transmission line will not permanently use any mineral resources.
Measures that might be implemented to mitigate the potential human and environmental impacts identified above and the estimated cost of the mitigative measures.	A mitigation agreement is in place for aesthetic impacts to IRRR land and the Discovery Center.
Wilderness Areas: No high voltage transmission line may be routed through state or national wilderness areas (Prohibition, Minn. R.7850.4300).	The Project does not cross of any state or national wilderness areas.
Parks and Natural Areas: No high voltage transmission line may be routed through state or national parks or state scientific and natural areas unless the transmission line would not materially damage or impair the purpose for which the area was designated and feasible and prudent alternative exists. Economic considerations alone do not justify use of these areas for high voltage transmission line (Minn. R. 7850.4300).	The Project does not include crossings of any state or national parks or state scientific and natural areas.

G. Conclusion

Based on the information included in this Minor Alteration application, Xcel believes the proposed 500 kV Transmission Line 5702 Reroute Project does not represent a significant change in the human or natural environment, and therefore qualifies as a Minor Alteration as defined by Minnesota Statute and Rule. Xcel Energy respectfully requests that the Commission approve the proposed Minor Alteration.

If there are any questions regarding this filing, please contact Tom Hillstrom by telephone at (612) 330-5835 or email at thomas.hillstrom@xcelenergy.com.

Sincerely,

A handwritten signature in cursive script that reads "Pamela J. Rasmussen". The signature is written in black ink and is positioned above the printed name.

PAM RASMUSSEN
XCEL ENERGY

Enclosures

Attachment A – Figures

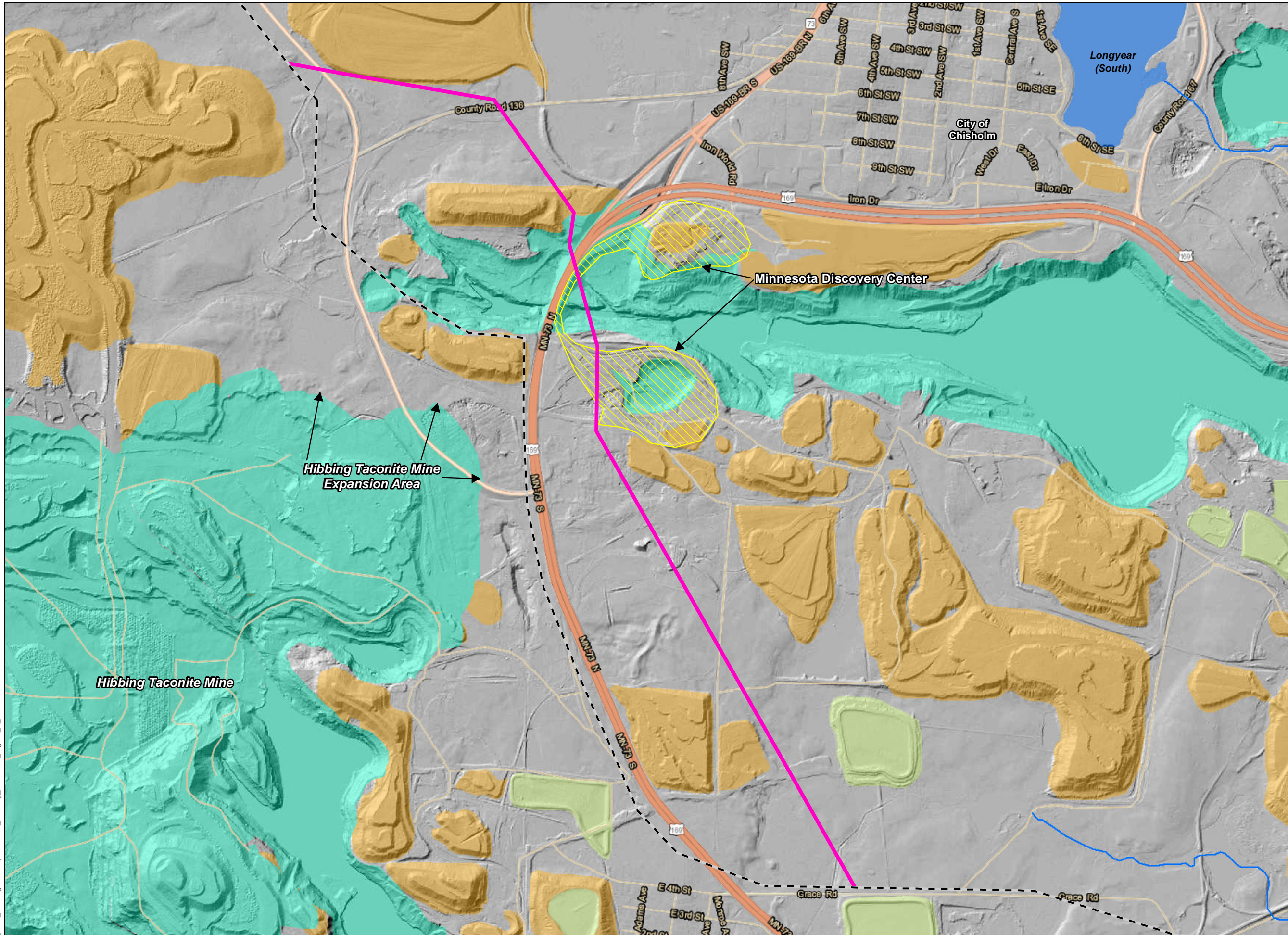
Attachment B – Original Permit for Line 5702

Attachment C – Route Development Process Details

Attachment D – Photo Simulations

Attachment E – Agency Correspondence

Attachment A



Hibbing Relocation Project (Line 5702)



**Figure 1
Project Overview Map**

St. Louis County, Minnesota

- Project Feature**
- Existing 500 kV Transmission Line
 - Proposed Location for Relocated Transmission Line
- Mine Feature**
- Stockpile
 - Mine Pit
 - Tailings Basin
- Water Feature**
- Public Water Basin
 - Public Water Waterway
- Jurisdiction**
- County Boundary
 - Minnesota Discovery Center

LIDAR Hillsshade Dated 2011



Disclaimer: The data provided on this map is for assessment and planning purposes only. It is not intended to be used for definition of legal boundary, property title, or construction. This is not a survey product. Tetra Tech is not responsible for the misuse or misrepresentation of the data.

Reference Map



P:\6601_Xcel_Hibbing\GIS\Layouts\Xcel_Hibbing_Overview_Figure_1_20191113.mxd



Hibbing Relocation Project (Line 5702)



**Figure 2
Project Map**

St. Louis County, Minnesota

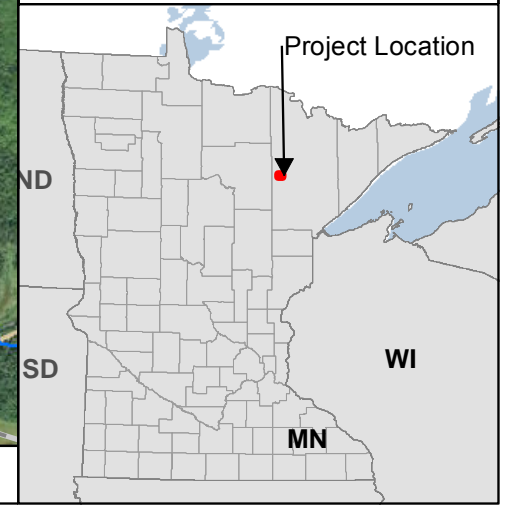
- Project Feature**
- Existing 500 kV Transmission Line
 - Proposed Location for Relocated Transmission Line
- Water Feature**
- Public Water Basin
 - Public Water Waterway
- Jurisdiction**
- County Boundary
 - Minnesota Discovery Center

USDA FSA NAIP Aerial Dated 2018

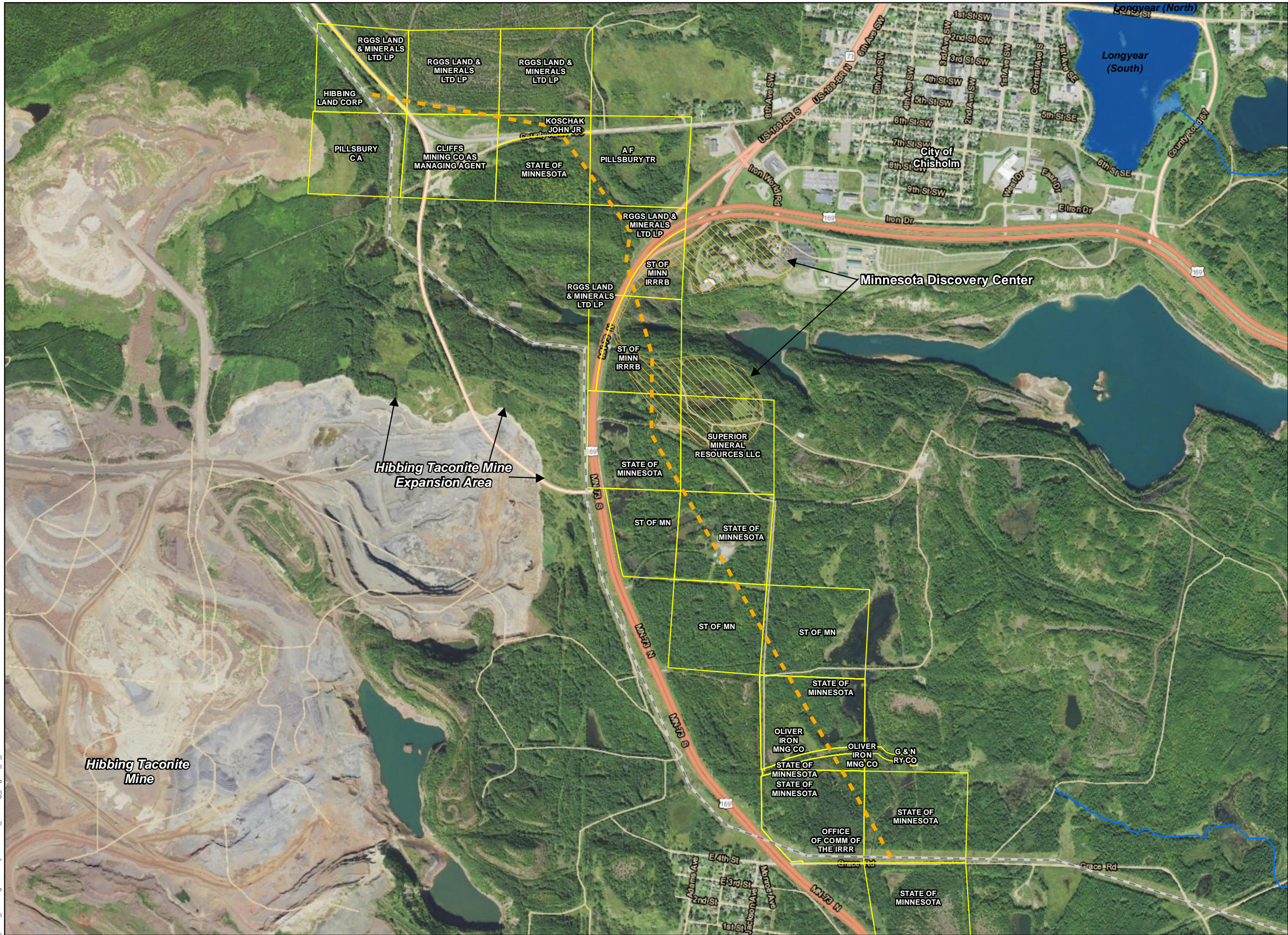


Disclaimer: The data provided on this map is for assessment and planning purposes only. It is not intended to be used for definition of legal boundary, property title, or construction. This is not a survey product. Tetra Tech is not responsible for the misuse or misrepresentation of the data.

Reference Map



P:\6601_Xcel_Hibbing\GIS\Layouts\Xcel_Hibbing_Figure_2_20191113.mxd



Hibbing Relocation Project (Line 5702)



Figure 3 Parcel Map

St. Louis County, Minnesota

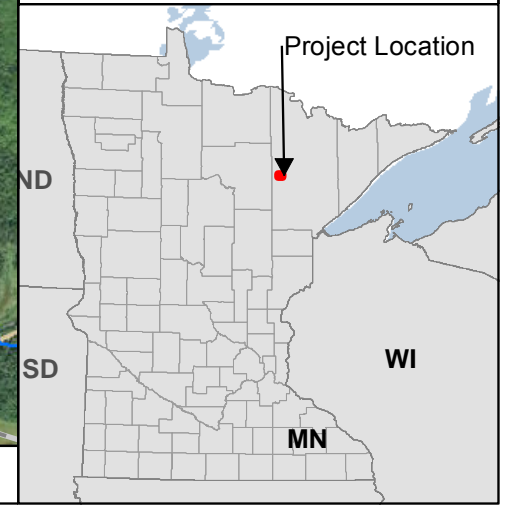
- Project Feature**
- Existing 500 kV Transmission Line
 - Proposed Location for Relocated Transmission Line
- Water Feature**
- Public Water Basin
 - Public Water Waterway
- Jurisdiction**
- County Boundary
 - Minnesota Discovery Center
 - Parcel

USDA FSA NAIP Aerial Dated 2018



Disclaimer: The data provided on this map is for assessment and planning purposes only. It is not intended to be used for definition of legal boundary, property title, or construction. This is not a survey product. Tetra Tech is not responsible for the misuse or misrepresentation of the data.

Reference Map



P:\6601_Xcel_Hibbing\GIS\Layouts\Xcel_Hibbing_Figure_3_20191113.mxd