



414 Nicollet Mall
Minneapolis, MN 55401

August 15, 2023

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

—Via Electronic Filing—

RE: IN THE MATTER OF THE APPLICATION FOR A CERTIFICATE OF NEED
FOR THE PROPOSED 345 kV BROOKINGS COUNTY – LYON COUNTY AND
HELENA – HAMPTON SECOND-CIRCUIT PROJECT
MPUC DOCKET NO. E002 /CN-23-200

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy (Company or Xcel Energy), respectfully submits the enclosed Certificate of Need application to the Minnesota Public Utilities Commission (Commission) for Xcel Energy's proposed Brookings County – Lyon County Second-Circuit Project and Helena – Hampton Second-Circuit Project (collectively, the Brookings County – Lyon County Second-Circuit Project and the Helena – Hampton Second-Circuit Project are referred to as the Brookings Second-Circuit Project or Project).

The Project is designed to reduce energy costs by addressing one of the most electrically congested areas in the region. Currently, low-cost energy generated in South Dakota, North Dakota, and southern Minnesota faces congestion when flowing to load centers, like the Twin Cities. When this congestion occurs, the cost of electricity increases either due to congestion charges or because electricity must come from higher-cost generators in areas without transmission constraints. These higher costs create inefficiencies in the wholesale energy market and increase costs for consumers. The Project is needed to relieve the current transmission congestion in this area. By relieving congestion, the Project is expected to increase access to low-cost, carbon-free, renewable generation; provide economic benefits; strengthen the regional grid; support wind generation facilities in Minnesota, North Dakota, and South Dakota; and advance the State's energy policy. Xcel Energy estimates that the Project would provide Company-specific benefits of \$334.83 million in production-cost and other quantifiable

economic benefits on a present-value basis over the life of the Project, as well as significant progress toward carbon-emission reduction policy objectives.

The Project involves installing a second circuit on double-circuit-capable structures installed when the Brookings – Hampton 345 kV transmission line (Original Brookings Line) was originally constructed. The second circuit will be installed on the Brookings County to Lyon County segment (Western Segment) and Helena to Hampton segment (Eastern Segment). During the construction of the Original Brookings Line, a second circuit was installed on the Lyon County to Helena segment.

The Company plans to place the Western Segment in service in 2024 and the Eastern Segment in service in 2025. This timeline will help customers realize the economic benefits of the Project more quickly. Additionally, having the Project in service by 2025 will allow the Project to provide outage support during the construction of the Long-Range Transmission Plan projects currently under development.

Minnesota Rules 7829.1200 and 7829.2500, subp. 9, contemplate that the Commission may consider a Certificate of Need application through “informal proceedings” without referring the application to the Office of Administrative Hearings. The Commission may rely on informal proceedings if there are no material facts in dispute. Given the Project largely involves the installation of a second circuit on existing structures and the significant economic benefits of the Project, the Company does not anticipate the application raising genuine issues of material fact.

We have electronically filed this document and the application with the Commission. Copies of this application are also being served on the persons on the attached distribution lists as provided in Minn. R. 7849.0200, subp. 2. A short summary of this application is being distributed, as required by Minn. R. 7829.2500, subp. 3. Notice of this proceeding will be published in the Star Tribune. The application processing fee, as required by Minn. R. 7849.0210, subp. 1, is being sent under separate cover.

Variance Request

Xcel Energy requests a variance to Minn. R. 7849.0200, subp. 2, to relieve the Company of the requirement that it file 13 copies of this, and future, Certificate of Need applications with the Commission. The Commission will grant a variance under Minn. R. 7829.3200 if a party meets the following three requirements:

- A. enforcement of the rule would impose an excessive burden upon the applicant or others affected by the rule;
- B. granting the variance would not adversely affect the public interest; and
- C. granting the variance would not conflict with standards imposed by law.

The variance request meets these standards. First, enforcement of the rule would impose an excessive burden on the Company. The Company understands that electronic filing meets the needs of Commission staff. Requiring the Company to prepare, and Commission staff to receive, 13 copies of voluminous Certificate of Need applications imposes an excessive burden on the Company and Commission. Second, granting the variance would not adversely affect the public interest. The public will continue to have access to the application through eDockets. The requirement that an applicant submit 13 copies was promulgated for the convenience of the Commission, not the public, before the widespread acceptance of electronic filing. Third, granting the variance would not conflict with standards imposed by law because the requirement to submit 13 copies of a Certificate of Need application is found in Commission rules, not statute. For these reasons, this request meets the standards for granting a variance.

Please note that Table 4.1 included in Application Chapter 4 is marked as “Protected Data.” Certain data therein is considered to be not-public data pursuant to Minn. Stat. § 13.02, subd.9, and is Trade Secret information pursuant to Minn. Stat. § 13.37, subd. 1(b), as this data derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by other persons who can obtain economic value from its disclosure or use.

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

Encls
cc: Service List

CERTIFICATE OF SERVICE

I, Christine Schwartz, hereby certify that I have this day served copies or summaries of the foregoing documents on the attached list(s) of persons.

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

or

xx electronic filing

Docket No. E002/CN-23-200

Dated this 15th day of August 2023

/s/

Christine Schwartz
Regulatory Administrator

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
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
Brian	Bell	bell.brian@dorsey.com	Dorsey & Whitney LLP	50 South Sixth St. Suite 1500 Minneapolis, Minnesota 55402	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, Minnesota 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