



July 22, 2024

—Via Electronic Filing—

The Honorable Megan J. McKenzie
Administrative Law Judge
Office of Administrative Hearings
600 North Robert Street
P.O. Box 64620
St. Paul, MN 55164-0620

RE: IN THE MATTER OF THE APPLICATION FOR A ROUTE PERMIT FOR THE
ALEXANDRIA TO BIG OAKS 345 kV TRANSMISSION PROJECT IN CENTRAL
MINNESOTA
DOCKET NO. E002, E017, ET2, E015, ET10/TL-23-159
OAH DOCKET No. 25-2500-39723

Dear Judge McKenzie:

Northern States Power Company, doing business as Xcel Energy, Great River Energy, Minnesota Power, Otter Tail Power Company, and Missouri River Energy Services, on behalf of Western Minnesota Municipal Power Agency (collectively, the Applicants) provide the following response to the comments filed by the Minnesota Department of Natural Resources (MnDNR) on July 3, 2024 related to the Mississippi River crossing for the Alexandria – Big Oaks 345 kV Transmission Project (Project).

The Applicants appreciate the MnDNR's continued coordination with the Applicants on the Mississippi River crossing for the Project and have prepared an alternative alignment for the Western Crossing Option B (Double-Circuit) to address the MnDNR's concerns about the potential impacts of this route on Minnesota Biological Survey (MBS) Sites of Biodiversity Significance. This new alignment, Western Crossing Option B (Double-Circuit) Modified, is located entirely within Applicants' proposed route width and would shift the alignment north of the Mississippi River crossing to reduce the number of acres of MBS Sites of Biodiversity Significance within the right-of-way. This new alignment is shown in **Attachment A**. As compared to the original alignment, the Western Crossing Option B (Double-Circuit) Modified reduces the acres of Sites of Biodiversity Significance within the right-of-way by 2.7 acres (from 15.1 acres

to 12.4 acres).¹ Though this new alignment has more acres of Sites of Biodiversity Significance within its right-of-way than MnDNR Option 2B (12.4 acres vs. 5.5 acres), there are fewer acres of Sites of High Biodiversity Significance within the right-of-way of this new alignment as compared to MnDNR Option 2B (4.0 acres compared to 5.5 acres). A table comparing the potential impacts of these three route and alignment options is provided as **Attachment B**.

In their July 3, 2024 comments, the MnDNR also recommended using side-by-side H-frame structures at the Mississippi River crossing for the double-circuit design options that would place the conductors in a horizontal configuration across the river to reduce the potential for avian interactions. The Applicants support the MnDNR's recommendation and plan to incorporate this design into the final design for the Project.

The Applicants also wish to clarify one item from the MnDNR's July 3, 2024 comments. In these comments, the MnDNR stated that the Applicants' Western Crossing Option B "crosses the river and then turns north to closely follow the Mississippi River bluff for over a mile." The MnDNR expressed concern that following the river bluff would result in tree clearing along the bluff and may impact the long-term stability of the bluff. It appears that the MnDNR's comments may be confusing the line showing Applicants' proposed route width (the red line in Attachment A) and the alignment for Western Crossing Option B (the yellow and yellow and black lines on Attachment A). As shown on Attachment A, the alignment for Western Crossing Option B crosses the Mississippi River and then continues straight rather than following the river bluff. As a result, the Western Crossing Option B would not require tree clearing along the bluff and would also not pose any risks to the long-term stability of the bluff.

If you have any questions regarding this filing, please contact Matt Langan at 612-330-6954 or matthew.a.langan@xcelenergy.com.

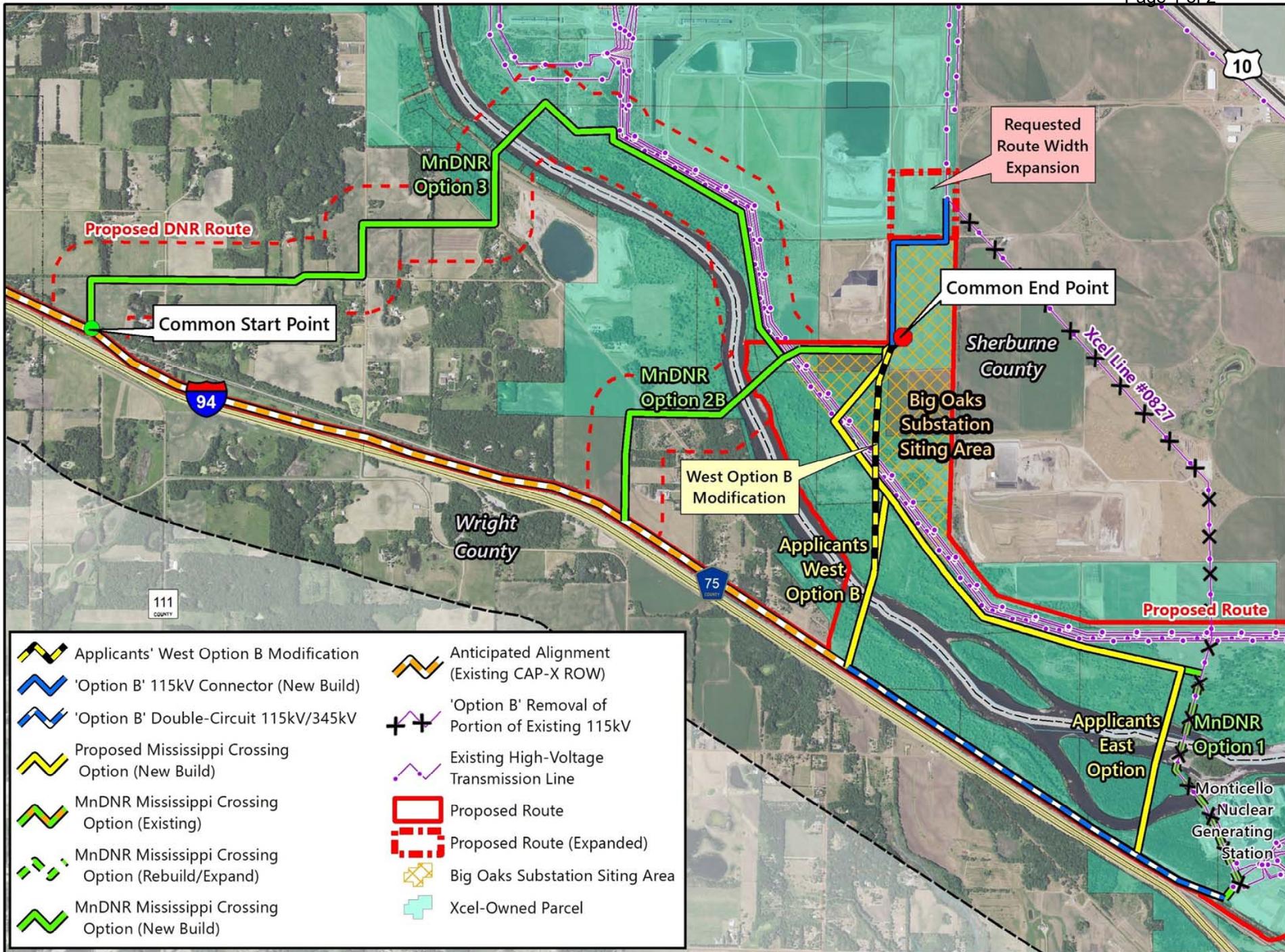
Sincerely,

/s/Matthew Langan

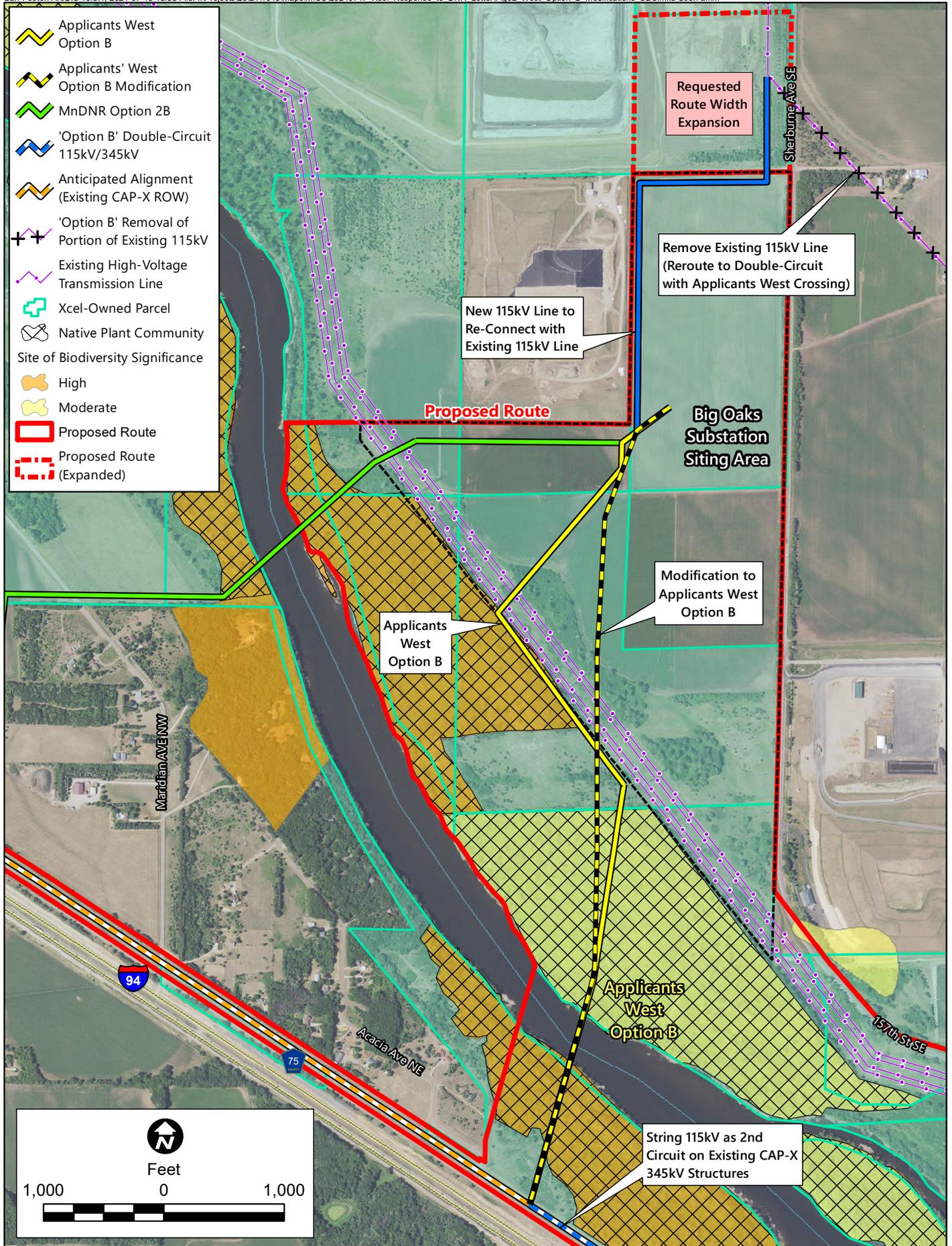
MATTHEW LANGAN
PRINCIPAL AGENT, SITING AND LAND RIGHTS
XCEL ENERGY

cc: Service List

¹ The Applicants' analysis assumes a right-of-way width of 230 feet as the MnDNR also prefers using H-frame structures at the Mississippi River crossing which require a 230 feet wide right-of-way rather than the 150 wide rights-of-way required for tangent structures.



Barr Footer: ArcGIS 10.8.1, 2024-07-18 13:38 File: I:\Projects\23\211018\Maps\MISC\20240717_Xcel_Response_to_DNR_Letter\Fig02_West_Option_B_Modifications_SBS.mxd User: amm



Route Option	Western Crossing Option B (Double-Circuit)*	Western Crossing Option B (Double-Circuit) Modified*	MnDNR Option 2B (Double-Circuit)*
Length (miles)	7.2	7.1	7.4
Stringing 2nd Circuit (345kV) on Existing Structures	3.2	3.2	2.2
Stringing 2nd Circuit (115kV) on Existing Structures	1.8	1.8	2.8
Single Circuit 345kV	-	-	-
Double Circuit (345kV/115kV)	1.4	1.3	1.6
Triple Circuit (345kV/345kV/115kV)	-	-	-
Single Circuit 115kV	0.8	0.8	0.8
Structure Count	45	43	46
Existing 345kV Structures (Stringing 2nd Circuit - 345kV)	17	17	12
Existing 345kV Structures (Stringing 2nd Circuit - 115kV)	9	9	14
Single Circuit 345kV Structures	-	-	-
Double Circuit (345kV/115kV) Structures	10	8	11
Triple Circuit (345kV/345kV/115kV) Structures	-	-	-
Single Circuit 115kV Structures	9	9	9
Estimated Cost	\$14,380,000	\$12,990,000	\$14,540,000
Sites of Biodiversity in right-of-way (acres)	22.3 (25.8**)	19.2 (23.1**)	14.1 (16.2**)
150 foot right-of-way (existing)(total)	10.7	10.7	10.7
Moderate	0	0	0
High	10.7	10.7	10.7
Utilizing 150 foot right-of-way (new)(total)	11.6	8.5	3.4
Moderate	5.9	5.9	0
High	5.7	2.6	3.4
Utilizing 230 ft right-of-way (at crossing) (new) (total)	15.1**	12.4**	5.5**
Moderate	8.0	8.3	0
High	7.1	4.0	5.5
New Length in Wild & Scenic River Corridor (miles)	0.7	0.5	0.6
New Private Property Easements			
Total Parcels	0	0	2 (5**)
Unique Landowners	0	0	2 (5**)
Acres of new Easement	0	0	6.9 (7.6**)
New Residence Offset Distances	0	0	2
0 - 75 Feet	0	0	0
75 - 300 feet	0	0	0
300 - 500 feet	0	0	2

*Option includes two potential structure configurations at the river crossing.

- 1) Two H-frames side-by-side to reduce the number of vertical planes in the flyway. This would require a 230' right-of-way
- 2) Single pole double-circuit to maintain a right-of-way width of 150'

** Two H-frame side-by-side configuration

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CERTIFICATE OF SERVICE

Theresa Senart certifies that on the 22nd day of July, 2024, on behalf of Northern States Power Company, doing business as Xcel Energy, along with Great River Energy, Minnesota Power, Otter Tail Power Company and Western Minnesota Municipal Power Agency, she efiled a true and correct copy of **Applicants' Letter Response to MnDNR Comments** by posting the same on [eDockets](#). Said Letter Response is also served as designated on the attached Service List on file with the Minnesota Public Utilities Commission in the above-referenced docket number.

/s/ Theresa Senart

Theresa Senart

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jon	Brekke	jbrekke@greenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_23-159_Official CC Service List
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_23-159_Official CC Service List
Brandon	Crawford	brandonc@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota St Ste W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_23-159_Official CC Service List
Adam	Duininck	aduininck@ncsrcc.org	North Central States Regional Council of Carpenters	700 Olive Street St. Paul, MN 55130	Electronic Service	No	OFF_SL_23-159_Official CC Service List
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_23-159_Official CC Service List
Daniel	Gunderson	dgunderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_23-159_Official CC Service List
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_23-159_Official CC Service List
Benjamin	Levine	Blevine@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_23-159_Official CC Service List
Megan	McKenzie	megan.mckenzie@state.mn.us	Office of Administrative Hearings	PO Box 64620 St Paul, MN 55164	Electronic Service	No	OFF_SL_23-159_Official CC Service List
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_23-159_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Priti	Patel	ppatel@greenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369-4718	Electronic Service	No	OFF_SL_23-159_Official CC Service List
Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND	81 E Little Canada Road St. Paul, MN 55117	Electronic Service	No	OFF_SL_23-159_Official CC Service List
Generic Notice	Regulatory	regulatory_filing_coordinato rs@otpc.com	Otter Tail Power Company	215 S. Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_23-159_Official CC Service List
Generic Notice	Residential Utilities Division	residential.utilities@ag.stat e.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_23-159_Official CC Service List
Nathaniel	Runke	nrunke@local49.org	International Union of Operating Engineers Local 49	611 28th St. NW Rochester, MN 55901	Electronic Service	No	OFF_SL_23-159_Official CC Service List
J.P.	Schumacher	jps@mrenergy.com	Missouri River Energy Services	N/A	Electronic Service	No	OFF_SL_23-159_Official CC Service List
Christine	Schwartz	Regulatory.records@xcele nergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_23-159_Official CC Service List
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_23-159_Official CC Service List
Janet	Shaddix Elling	jshaddix@janetshaddix.co m	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_23-159_Official CC Service List
JoAnn	Thompson	jthompson@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_23-159_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Stuart	Tommerdahl	stommerdahl@otpco.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_23-159_Official CC Service List
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_23-159_Official CC Service List
Terry	Wolf	terry.wolf@mrenergy.com	Missouri River Energy Services	3724 W Avera Dr PO Box Sioux Falls, SD 571098920	Electronic Service	No	OFF_SL_23-159_Official CC Service List