

**ENERGY INFRASTRUCTURE PERMITTING STAFF
COMMENTS AND RECOMMENDATIONS ON AN AMENDED ROUTE PERMIT**

Minnesota Energy Connection 345 kV Transmission Line Project

DOCKET NO. E-002/TL-22-132

Date: December 18, 2025

EIP Staff: Tessa Kothlow | 651-539-1069 | tessa.kothlow@state.mn.us

In the Matter of the Route Permit Amendment Application for the Minnesota Energy Connection Project in Sherburne, Stearns, Kandiyohi, Meeker, Renville, Redwood, and Lyon Counties in Minnesota

Issued Addressed: These comments and recommendations address Xcel Energy's request for a route permit amendment for the Minnesota Energy Connection Project.

Additional documents and information can be found on eDockets:

<https://www.edockets.state.mn.us/documents> (22-132) and on the Commission's website:
<https://puc.eip.mn.gov/web/project/15000>.

This document can be made available in alternative formats (i.e., large print or audio) by calling 651-296-0406 (voice). Persons with a hearing or speech impairment may call using their preferred telecommunications relay service.

Introduction and Background

On June 11, 2025, the Commission issued an order granting a certificate of need and issuing route permit to Northern States Power Company, doing business as Xcel Energy (Xcel Energy or applicant) for construction and operation of the Minnesota Energy Connection project (project).¹ On November 24, 2025, Xcel Energy filed a request to amend the route permit under Minnesota Statue 216I.09.² Xcel Energy is requesting an amendment to shift a short segment of the approved transmission line route in Redwood County south to instead follow an approximately 2.5-mile portion along the north side of County Road 4. For this amended segment, Xcel Energy is proposing a 200 foot route width and a 150 foot right-of-way.

¹ Minnesota Public Utilities Commission, *Ordering Modifying and Adopting Administrative Law Judge Report, Granting Certificate of Need, and Issuing Route Permit for the Minnesota Energy Connection Project*, June 11, 2025, eDockets No. [20256-219823-01](#)

² Xcel Energy, *Route Permit Amendment to the Minnesota Public Utilities Commission for the Minnesota Energy Connection Project*, November, 24, 2025, eDockets No. [202511-225238-01](#) (Hereinafter Route Permit Amendment Request or RPAR)

As explained by Xcel Energy, the changes are intended to:

- 1) Avoid wetland drainages
- 2) Avoid shallow agricultural drainage tile outlets
- 3) Reduce tree clearing
- 4) Accommodate a landowner's planned agricultural erosion-control berms

On December 4, 2025, the Commission issued a notice soliciting comments on the on the route permit amendment application.³ The Commission identified the following topics for comment:

- 1) Should the Commission amend the route permit as requested by Xcel Energy?
- 2) If the route permit amendment is authorized, what additional conditions, if any, should the Commission impose?
- 3) Are there other issues or concerns related to this matter?

Regulatory Process and Procedures

Under Minn. Stat. § 216I.09, the owner of a large energy infrastructure facility may request to modify any provision or condition of a site or route permit issued by the Commission. Applicants requesting an amendment must describe the alteration to be made or the amendment sought and must describe any changes to the environmental impacts evaluated by the Commission as part of the initial permit approval. After a public comment period, the Commission must decide whether to authorize a requested permit amendment or determine that some other action is required. The Commission may impose reasonable conditions on any amendment it authorizes.

The text of Minn. Stat. § 216I.09 does not provide guidance for the Commission as to when a permit amendment should be authorized. The route permit for the Minnesota Energy Connection project (project) includes guidance for changes to the anticipated alignment of the project within the designated route. Section 4 of the permit reads, in part:

Any right-of-way or alignment modifications within the Designated Route shall be located so as to have comparable overall impacts relative to the factors in Minn. R. 7850.4100, as does the right-of-way and alignment identified in this route permit, and shall be specifically identified and documented in and approved as part of the plan and profile submitted pursuant to Section 9.2 of this route permit.⁴

This guidance – comparable overall impacts relative to the factors in Minn. R. 7850.4100 – is applicable to changes in the anticipated alignment within the designated route. EIP staff believes that it would be

³ Minnesota Public Utilities Commission, *Notice of Comment Period on Route Permit Amendment Application*, December, 4, 2025, eDockets No. [202512-225525-01](#)

⁴ Route Permit, Minnesota Energy Connection Project, pg. 5, Section 4 – Right-Of-Way, June 11, 2025, eDockets No. [20256-219826-01](#)

appropriate to use this guidance (or something similar) to evaluate entirely new routes and alignments. Accordingly, EIP staff uses this guidance in evaluating Xcel Energy's proposed permit amendment.

EIP Staff Analysis and Comments

EIP staff have reviewed the permit amendment request and provides the following analysis and comments in response to the Commission's notice. Staff notes that Xcel Energy's proposed amended route was not analyzed as an alternative route option in the Environmental Impact Statement (EIS) prepared for this project.⁵ Thus, analysis and comments here are based on Xcel Energy's permit amendment request.

Human Settlement Impacts

EIP staff believes that Xcel Energy's proposed amended route will increase impacts to human settlements in the project area, particularly with respect to aesthetic and property values.

Xcel Energy notes that the amended route will not result in additional residences within 500 feet of the proposed amended alignment.⁶ However, for purposes of analyzing certain impacts of the project, 500 feet is not a relevant distance. The EIS for the project describes the regions of influence (ROI) for specific project impacts.⁷ The ROI for aesthetic impacts and for property value impacts is noted in the EIS as the "local vicinity," which is defined as "within 1,600 feet of the anticipated alignment."⁸

The proposed amended route will bring three, new residences within this 1,600 feet ROI (Table 1, Map 1). Thus, there will be new aesthetic and property value impacts for these residences. Impacts that would not occur along the permitted route.

Table 1. Additional Residences with 1,600 Foot ROI⁹

Residence	Distance from Alignment of Permitted Route (feet)	Distance from Alignment of Amended Route (feet)
A	1,900	700
B	3,400	800
C	3,500	900

⁵ Minnesota Department of Commerce, Energy Environmental Review and Analysis, *EIS Main Text*, January 22, 2025, eDockets No. [20251-214220-01](https://puc.eip.mn.gov/web/project/15000) (Hereinafter EIS)

⁶ RPAR, pg. 5, Section 3.1 Human Settlement -Proximity to Residences

⁷ EIS, pg. 74, Section 5.1.2 Regions of Influence

⁸ EIS, pg. 75, Table 5-1 – Regions of Influence

⁹ Distances in the table were determined using MN Energy Connection WebView GIS mapping tool which can be found on the Commission's Website, accessed December 16, 2025, <https://puc.eip.mn.gov/web/project/15000>.

Xcel Energy notes that “passersby on County Road 4 will likely not observe a change to the viewshed resulting from the project based on the proximity of the proposed amended route to existing distribution line structures.”¹⁰ EIP staff disagrees with this characterization. Though there may be existing distribution lines along County Road 4, staff believes that new 345 kV transmission line structures would significantly change the viewshed along this segment of County Road 4 and would result in aesthetic impacts along this segment that would not occur with the permitted route.

Public Health Impacts

Xcel Energy’s proposed amended route moves the route south to traverse an additional 2 miles on the north side of County Road 4. EIP staff agrees with Xcel Energy that the proposed amended route does not change the voltage, current, or number of proposed transmission lines associated with the project.¹¹ However, amending the location of the route alters the resources that could be impacted.

The ROI for electric and magnetic fields (EMF) is the right-of-way (ROW). The ROW for the project is 150 feet – 75 feet on each side of the transmission line. Potential EMF impacts can be minimized by placing the line away from residences and adhering to electric field standards for transmission lines.¹² EIP staff notes that the proposed amended route would place the line nearer to residences and to the users of County Road 4. The EIS finds that potential impacts due to EMF from the project are anticipated to be minimal.¹³ This said, potential EMF impacts associated with the proposed amended route, though minimal, will differ from those of the permitted route.

Environmental Impacts

EIP staff believes that Xcel Energy’s proposed amended route will slightly decrease impacts to environmental resources in the project area, particularly with respect to vegetation and tree clearing.

Xcel Energy performed a review of the National Wetland Inventory as well as a desktop wetland review and confirmed there are three wetland crossings located within the right-of-way of the proposed amended route and six wetland crossing associated with the permitted route.¹⁴ Further, Xcel Energy notes that the proposed amended route would have an impact on an additional 0.3 acres of surface waters and wetlands.¹⁵

¹⁰ RPAR pg. 3, Section 3.1 Aesthetics

¹¹ RPAR, pg. 5, Section 3.3 Public Health and Safety – Electromagnetic Fields and Static Voltage

¹² EIS, pg. 118, Section 5.3.1 Electric Magnetic Fields (EMF)

¹³ Id. (“Impacts to human health from possible exposure to EMFs are not anticipated. The HVTL would be constructed to maintain proper safety clearances and the substations would not be accessible to the public. EMF associated with the project are below Commission permit requirements, and state and international guidelines. Potential impacts would be long-term and localized. These unavoidable impacts would be of a small size and can be mitigated.”)

¹⁴ RPAR, pg. 8, Section 3.10.2.2 Surface Water and Wetlands

¹⁵ Though noting these impacts as “negligible”

In comparison to the permitted route, the proposed amended route will result in a reduction of 3.2 acres of upland forest clearing.¹⁶ It is unclear to EIP staff what percentage reduction this acreage represents.

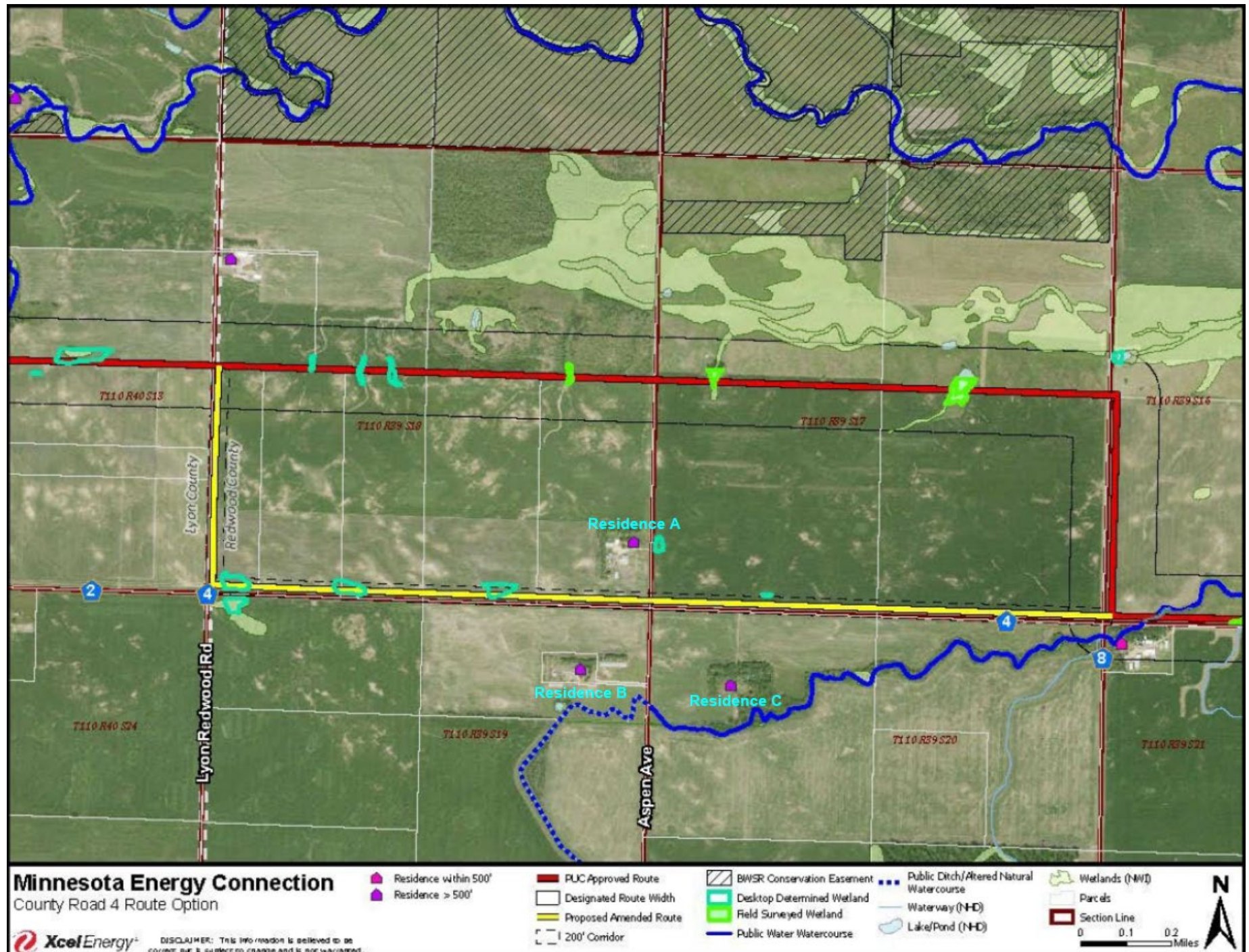
EIP Staff Recommendations

Based on the above analysis, EIP staff believes that the proposed amended route would increase aesthetic and property value impacts of the project and would decrease environmental impacts of the project specifically related to tree clearing. If the Commission believes that the proposed amended route has comparable overall impacts relative to the factors in Minn. R. 7850.4100, then staff believes the Commission should authorize the permit amendment. If not, staff believes the Commission should deny the permit amendment.

Staff notes that of the four rationales provided for the permit amendment, three of them – avoiding wetland drainages, avoiding drain tile outlets, and accommodating erosion control berm – appear to be addressable by prudent structure placement along the permitted route. Staff believes that the fourth rationale, tree clearing, is marginally addressed by structure placement and depends to a much greater extent on the route selected for the project in this area.

¹⁶ RPAR, pgs. 8-9 Section 3.10.4 Vegetation

Map 1. Proposed Amended Route¹



¹ Adapted from Xcel's RPAR, Map 1 Proposed Amended Route, but modified to designate Residences A, B, and C