



Minnesota Department of Commerce
 85 7th Place East | Suite 280 | St. Paul, MN 55101
 Information Request

Docket Number: TL-23-157

Requested From: Prehn Family and NoCapX 2020 through its counsel
 Carol A. Overland

Nonpublic Public

Date of Request: 5/23/2025
 Due: 6/5/2025

Request Number: 001

Topic: Combined Landowners Mailing List

Reference(s): n/a

Request:

Please see attached DOC-EERA Excel spreadsheet, Combined Landowners Mailing List, eFiled December 11, 2024 (202412-212877-03).

- (a) Do you agree that on the "Original List" there were 2,735 landowners?
- (b) Do you agree that for "Additional Hwy 14 Parcels" there were 132 landowners?
- (c) Do you agree that for "Additional Parcels Round 2" there were 189 landowners?
- (d) Do you agree that for "Additional Parcels Round 3" there were 53 landowners?
- (e) Do you agree that $2,735 + 132 + 189 + 53 = 3,109$?
- (f) Are affected landowners these 3,109 PLUS 1,341 "newly affected landowners," totaling 4,450? If not, please explain.
- (g) Is the total, or any of the subcategories above, of potentially affected landowners some other number? Please explain.

Response:

- (a) No, the spreadsheet includes 2,703 landowner listings. Some of the landowners listed are on the "Original List" in more than one location, as they may own multiple properties.
- (b) Yes.
- (c) Yes, there are 189 landowner listings, but some of those landowners may be listed more than once if they own multiple properties.
- (d) Yes.

To be completed by responder

Response Date: 6/5/2025

Response By: Department of Commerce through its counsel Richard Dornfeld

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(e) The sum of the numbers shown in subpart (e) is correct, but 2,735 is not the correct number from the "Original List." The "Original List," as explained in the response to subpart (a), has 2,703 landowner listings, so the total should be 3,077.

(f) No, 4,450 is not an accurate number of affected landowners. As discussed in response to subpart (e), 3,109 is not an accurate number and should be 3,077 if adding the "Original List," "Additional Hwy 14 Parcels," "Additional Parcels Round 2," and "Additional Parcels Round 3."

A simple addition of landowners on the project mailing lists is not an accurate measure of affected landowners. The landowner mailing lists can include multiple listings of some landowners if they have multiple properties along a proposed route or one of the alternatives.

Additionally, the landowner mailing list is developed by identifying landowners of properties along the proposed routes and alternatives, as well as additional landowners that may be adjacent to, or in close proximity to the proposed routes and/or alternatives. Thus, a number of property owners that are not directly on an anticipated alignment or rights-of-way would also receive mailings.

Also, with multiple proposed routes and multiple alternatives being considered, not all of those routes and alternatives will be selected if a route permit is issued, so to simply add landowners on mailing lists does not accurately reflect the number of landowners that may ultimately be affected by a given project.

(g) As previously noted, landowner mailing lists do not reflect affected or potentially affected landowner lists, so the total and none of the subcategories listed above are an accurate reflection of affected or potentially affected landowners. Because in most cases either a proposed route or an alternative is selected, but both routes would not be utilized. Additionally, the term "affected" and phrase "potentially affected" imply that a landowner is impacted by a project, but a number of landowners on the mailing lists are not directly along an anticipated alignment or within the project rights-of-way and will likely not experience any affects or impacts from the proposed project.

To be completed by responder

Response Date: 6/5/2025

Response By: Department of Commerce through its counsel Richard Dornfeld

Email Address: richard.dornfeld@ag.state.mn.us

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Xcel Energy	Information Request No.	4
Docket No.:	E002/CN-22-532 & E002/TL-23-157	
Response To:	Prehn Family and NoCapX 2020	
Requestor:	Carol A. Overland	
Date Received:	May 23, 2025	

Question:

Regarding landowner mailing lists and notice, please see attached DoC-EERA's "Combined Landowners Mailing List" eFiled [202412-212877-03](#) on 12/11/2025 and Xcel's "Mailed Notice of Scoping Decision, eFiled [20255-218883-01](#) on 5/13/2025.

Xcel states in the May 13, 2025 filing that "this mailing was sent to 2,878 landowners, including all 1,341 landowners that were inadvertently not sent the DOC-EERA's New Landowner Full Packet." Xcel's mailing that includes the 1,341 landowners implies that the original landowners totaled 1,537 (2,878 – 1,341). Is this correct? What was the source of Xcel's original landowner and the number of original landowners per Xcel.

Commerce-EERA's spreadsheet states that there were 2,703 original landowners, plus additional ones notified that appear to total 3,109 as of the December 11, 2025 EERA filing.

Please explain Xcel's numbers and source, with documentation.
 Please reconcile Xcel and Commerce-EERA's numbers.

Response:

As stated in Xcel Energy's May 13, 2025 filing ([20255-218883-01](#)):

"On January 31, 2025, Xcel Energy sent a mailing to landowners with property located either on one of the newly added route or alignment alternatives or on one of the routes originally proposed in the Route Permit application. In total, this mailing was sent to 2,878 landowners, including all 1,341 landowners that were inadvertently not sent the DOC-EERA's New Landowner Full Packet."

Xcel Energy can only provide information about mailing lists that it compiled and cannot provide information about the spreadsheet included in the December 11, 2024 filing by the Department of Commerce, Energy Environmental Review and Analysis

(DOC-EERA). The 2,878 landowners for the Xcel Energy's January 31, 2025 mailing were identified through the following multi-step process:

- The route width (route alignment) was determined so that parcels within and touching the route width for each of the routes and alignment alternatives included in Route Permit Application and the Environmental Impact Statement (EIS) Scoping Decision issued on December 2, 2024 were identified. The route width was generally set at 1,000 feet wide (500 feet on either side of the centerline of the proposed routes). In some locations, a route width of greater than 1,000 feet was used due to potential routing constraints.
- Xcel Energy accessed and obtained parcel data from each of the applicable counties that were within the identified route width. The following counties provided parcel data: Blue Earth, Dodge, Goodhue, Le Sueur, Olmstead, Rice, Steele, Wabasha, and Waseca.
- Xcel Energy's consultant ran a GIS process to select all parcels that intersected with any part of the route width for any of the route alternatives included in the EIS scoping decision. Xcel Energy included in its attributes for each parcel whether that parcel was affected by one of the routes originally proposed in the Route Permit application or was part of one of the new route or alignment alternatives included in the scoping decision.
- The selected parcel data was reviewed to identify records where parcels did not contain landowner information. For these parcels, Xcel Energy's consultant attempted to find missing landowner data by accessing and reviewing county-provided online parcel data and filled in landowner information to create a complete landowner parcel list (Landowner List). Even after taking these steps, some of the parcel data still did not contain complete landowner information, such as complete mailing addresses or contact information, which could be used for mailing a letter or notice about the Project.
- Xcel Energy's consultant then completed the following steps to identify, correct, and remove duplicate landowners from the Landowner List. This was done so landowners who own multiple parcels were not mailed more than one letter or notice. This involved the following steps:
 - Going through the Landowner List and correcting and standardizing the landowner names. Many names appeared to be correct, but many were also transposed with last names first. In addition, some names that should have been together were broken across separate data columns. Because there was no consistent pattern, Xcel Energy's consultant manually reviewed all of the names to fix transposed names.
 - Xcel Energy's consultant also standardized addresses by replacing full text terms with U.S. Postal Service (USPS) standard abbreviations and terms and removed punctuations to support deduplication. Xcel Energy's consultant also manually

reviewed address data to shift elements that better belonged under a secondary name column such as “attention” or “care of” names over to a secondary name column. The “city” and “state” columns were also reviewed for inconsistencies such as misspellings and inconsistent abbreviations.

- Once the names and addresses were standardized, Xcel Energy’s consultant grouped rows with identical names and addresses into single rows. The combined rows contained a count of the rows combined along with a delimited list of values for parcel identification numbers, and route metadata. Once identical names and addresses were combined, the list was manually reviewed to identify cases where rows were clearly addressed to the same parties at the same address, but who were not initially flagged as duplicate due to small insubstantial variations or where a single landowner on one row was also included in a multiparty addressee on another row. Finally, addresses were reviewed to fill in missing elements where the correct element could be obtained with confidence.
- Once the deduplicated Landowner List was compiled and initial quality checks were completed, Xcel Energy’s consultant created a new list that again split out the deduplicated list into separate rows for each parcel. Xcel Energy’s consultant’s GIS staff then reloaded that split out list into ArcGIS so that they could ensure no parcels were lost in the deduplication process.

Xcel Energy’s consultant then created three Excel spreadsheets with landowner names and addresses (Final Landowner Mailing Spreadsheets). These three Final Landowner Mailing Spreadsheets were: (1) Combined Landowners, which included 11 parcels that did not have complete landowner contact information such that mailings could not be mailed; (2) Scoping Alternative Landowners; and (3) Xcel’s Proposed Route Alternative Landowners. These Final Landowner Mailing Spreadsheets were used to create the mailing list that was used for Xcel Energy’s January 31, 2025 mailing that went out to 2,878 landowners.

These Final Landowner Mailing Spreadsheets were also sent to the DOC-EERA in November 2024 to use for their mailings related to the issuance of the scoping decision for the EIS.

Preparer: Ellen Heine

Title: Principal Siting and Land Rights Agent

Department: Siting and Land Rights

Telephone: (612) 330-6073

Date: June 6, 2025

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Xcel Energy	Information Request No.	5
Docket No.:	E002/CN-22-532 & E002/TL-23-157	
Response To:	Prehn Family and NoCapX 2020	
Requestor:	Carol A. Overland	
Date Received:	May 23, 2025	

Question:

Regarding landowner mailing lists and notice, as requested by Nancy Prehn at the May 27, 2025 Public Hearing, please provide the number of landowners potentially affected by Xcel's Preferred Route and reference PUC eDocket number(s) for Affidavit(s) of Service and Landowner List

Response:

To determine the number of potentially affected landowners, Xcel Energy applied a 1,000 foot route width (500 feet on either side of anticipated centerline) to the Preferred Route described in the Direct Testimony of Ellen Heine. This resulted in 1,471 parcels that are potentially affected by Xcel Energy's Preferred Route.

After this initial list of parcels was identified, Xcel Energy deduplicated this list to come up with 958 parcels. After this, 50 parcels with similarly named landowners, and four parcels with invalid addresses were removed. A parcel was determined to have an invalid address if it was missing key address information such as a street number or the entire street address. This resulted in a list of 904 landowners along Xcel Energy's Preferred Route.

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