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November 14, 2025

VIA E-FILING

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

**Re: Exceptions to the Administrative Law Judge's Findings of Fact,
Conclusions of Law, and Recommendation**

IN THE MATTER OF THE APPLICATION OF XCEL ENERGY FOR A ROUTE PERMIT FOR THE
MANKATO TO MISSISSIPPI RIVER 345 kV TRANSMISSION PROJECT IN SOUTHERN
MINNESOTA
MPUC DOCKET No. E002/TL-23-157
CAH DOCKET No. 65-2500-40099

Dear Ms. Bergman,

Northern States Power Company, doing business as Xcel Energy, appreciates the thorough and detailed Findings of Fact, Conclusions of Law, and Recommendation (ALJ Report) filed by Administrative Law Judge Ann C. O'Reilly on October 30, 2025. Attachment A to this filing details Xcel Energy's minor exceptions to the ALJ Report. Xcel Energy respectfully requests that the Minnesota Public Utilities Commission adopt the ALJ Report with the modifications outlined in Attachment A.

Sincerely,

/s/ Valerie T. Herring

Valerie T. Herring

Enclosure
cc: Service List

Location in ALJ Report	ALJ Report Language	Applicant's Proposed Redline	Clean Version
Page 2, Summary of Recommendation	Segment 2 North, Conductor Segment 2G, and Segment 2 South [referred to in the FEIS as Route Option B].	Segment 2 North, Conductor <u>Connector</u> Segment 2G, and Segment 2 South [referred to in the FEIS as Route Option B].	Segment 2 North, Connector Segment 2G, and Segment 2 South [referred to in the FEIS as Route Option B].
Page 17, Finding No. 106	For portions of the Project where the new 345 kV lines will be co-located with existing 69 kV transmission lines, Xcel Energy will build below these existing 69 kV transmission lines with the new 345 kV line.	For portions of the Project where the new 345 kV lines will be co-located with existing 69 kV transmission lines, Xcel Energy will <u>underbuild</u> below these existing 69 kV transmission lines with the new 345 kV line.	For portions of the Project where the new 345 kV lines will be co-located with existing 69 kV transmission lines, Xcel Energy will underbuild these existing 69 kV transmission lines with the new 345 kV line.
Page 17, Finding No. 108	No new structures are anticipated to be required for Segment 3. Segment 3 involves converting an existing 161/345 kV transmission line to 345/345 kV operation or installing a new 345 kV circuit on structures that now host double-circuits.	No new structures are anticipated to be required for Segment 3. Segment 3 involves converting an existing 161/345 kV transmission line to 345/345 kV operation or installing a new 345 kV circuit on <u>existing double-circuit</u> structures that now host double-circuits .	No new structures are anticipated to be required for Segment 3. Segment 3 involves converting an existing 161/345 kV transmission line to 345/345 kV operation or installing a new 345 kV circuit on existing double-circuit structures.
Page 35, Finding No. 223	The westernmost 27 miles of Segment 3 would convert an existing 161 kV	The westernmost 27 <u>16</u> miles of Segment 3 would convert an existing 161 kV	The westernmost 16 miles of Segment 3 would convert an existing 161 kV

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	transmission line to 345 kV operation. The easternmost 16 miles of Segment 3 would involve installing new 345 kV transmission lines on the existing transmission structures. Additionally, the Mississippi River crossing would not require any new construction because the existing 69 kV line would be converted to 345 kV operation.	transmission line to 345 kV operation. The easternmost <u>next approximately</u> 16 miles of Segment 3 would involve installing new 345 kV transmission lines on the existing transmission structures. Additionally, the Mississippi River crossing would not require any new construction because the existing 69 kV line would be converted to 345 kV operation.	transmission line to 345 kV operation. The next approximately 16 miles of Segment 3 would involve installing new 345 kV transmission lines on the existing transmission structures. Additionally, the Mississippi River crossing would not require any new construction because the existing 69 kV line would be converted to 345 kV operation.
Page 39, Finding No. 245	In the later Direct Testimony of Company witness Ellen Heine, however, the Applicant stated that it had analyzed the route and alignment alternatives studied in the EIS and, as a result of that analysis, Excel Energy determined its current preferred route for each segment of the Project.	In the later Direct Testimony of Company witness Ellen Heine, however, the Applicant stated that it had analyzed the route and alignment alternatives studied in the EIS and, as a result of that analysis, EX cel Energy determined its current preferred route for each segment of the Project.	In the later Direct Testimony of Company witness Ellen Heine, however, the Applicant stated that it had analyzed the route and alignment alternatives studied in the EIS and, as a result of that analysis, Xcel Energy determined its current preferred route for each segment of the Project.

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Page 46, Finding No. 280	The Commission is also going by Minn. R. 7850.4100 (2025), which mandates consideration of the following factors when determining whether to issue a route permit for a high-voltage transmission line.	The Commission is also going by Minn. R. 7850.4100 (2025) <u>(2023)</u> , which mandates consideration of the following factors when determining whether to issue a route permit for a high-voltage transmission line.	The Commission is also going by Minn. R. 7850.4100 (2023), which mandates consideration of the following factors when determining whether to issue a route permit for a high-voltage transmission line.
Page 47, Finding No. 282	Minnesota Rule 7850.4100(A) (2023) requires consideration of the Project's effects on human settlement, including displacement of residences and businesses, noise created during construction or by operation of the Project, and impacts to aesthetics, cultural values, recreation, and public services.	Minnesota Rule 7850.4100(A) (2025) <u>(2023)</u> requires consideration of the Project's effects on human settlement, including displacement of residences and businesses, noise created during construction or by operation of the Project, and impacts to aesthetics, cultural values, recreation, and public services.	Minnesota Rule 7850.4100(A) (2023) requires consideration of the Project's effects on human settlement, including displacement of residences and businesses, noise created during construction or by operation of the Project, and impacts to aesthetics, cultural values, recreation, and public services.
Page 47, Footnote No. 310	Minn. R. 7850.4100 (2025).	Minn. R. 7850.4100 (2025) <u>(2023)</u> .	Minn. R. 7850.4100 (2023).

Location in ALJ Report	ALJ Report Language	Applicant's Proposed Redline	Clean Version
Page 49, Finding No. 290	Comparison of Residential Impacts for Segments 1 and 2 and Route Segment 17	Comparison of <u>Non-Residential</u> Impacts for Segments 1 and 2 and Route Segment 17	Comparison of Non-Residential Impacts for Segments 1 and 2 and Route Segment 17
Page 62, Finding No. 378	Minnesota Rule 7850.4100(B) (2025) requires consideration of the Project's effect on public health and safety.	Minnesota Rule 7850.4100(B) (2025) (2023) requires consideration of the Project's effect on public health and safety.	Minnesota Rule 7850.4100(B) (2023) requires consideration of the Project's effect on public health and safety.
Page 90, Footnote No. 570	Minn. R. 7850.4100(H) (2025)	Minn. R. 7850.4100(H) (2025) (2023)	Minn. R. 7850.4100(H) (2023)
Page 95, Finding No. 561	Minn. R. 7850.4100(M) (2025) requires consideration of unavoidable human and environmental impacts. Resource impacts are unavoidable when an impact cannot be avoided even with mitigation strategies.	Minn. R. 7850.4100(M) (2025) (2023) requires consideration of unavoidable human and environmental impacts. Resource impacts are unavoidable when an impact cannot be avoided even with mitigation strategies.	Minn. R. 7850.4100(M) (2023) requires consideration of unavoidable human and environmental impacts. Resource impacts are unavoidable when an impact cannot be avoided even with mitigation strategies.
Page 103, Recommendation	Segment 2 North, Conductor Segment 2G, and Segment 2 South [referred to in the FEIS as Route Option B].	Segment 2 North, Conductor <u>Connector</u> Segment 2G, and Segment 2 South [referred to in the FEIS as Route Option B].	Segment 2 North, Connector Segment 2G, and Segment 2 South [referred to in the FEIS as Route Option B].

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CERTIFICATE OF SERVICE

Gustav Gerhardson certifies that on the 14th day of November, 2025, on behalf of Northern States Power Company, doing business as Xcel Energy, he efiled a true and correct copy of the **Exceptions to the Administrative Law Judge's Findings of Fact, Conclusions of Law, and Recommendation** by posting the same on [eDockets](#). Said filing 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/ Gustav Gerhardson
Gustav Gerhardson

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
11	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	23-157Official
12	Ellen	Heine	ellen.l.heine@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MP-8 Minneapolis MN, 55401 United States	Electronic Service		No	23-157Official
13	Abigail	Hencheck	ahencheck@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Suite 515 St. Paul MN, 55104 United States	Electronic Service		No	23-157Official
14	Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S. Eighth Street Minneapolis MN, 55402 United States	Electronic Service		No	23-157Official
15	Becky	Horton		Minnesota Department of Natural Resources		Division of Ecological & Water Resources 500 Lafayette Road St. Paul MN, 55155 United States	Paper Service		No	23-157Official
16	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	23-157Official
17	Jamie	MacAlister	jamie.macalister@state.mn.us		Department of Commerce	85 7th Place East, Ste. 500 St. Paul MN, 55101 United States	Electronic Service		No	23-157Official
18	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	23-157Official
19	Ann	O'Reilly	ann.oreilly@state.mn.us		Office of Administrative Hearings	PO Box 64620 St. Paul MN, 55101 United States	Electronic Service		Yes	23-157Official
20	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	23-157Official
21	Cezar	Panait	cezar.panait@state.mn.us		Public Utilities Commission	121 7th Place East	Electronic Service		No	23-157Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Suite 350 St. Paul MN, 55101 United States				
22	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	23-157Official
23	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	23-157Official
24	Jeffrey	Small	jsmall@misoenergy.org			MISO P.O. Box 4202 Carmel IN, 46082-4202 United States	Electronic Service		No	23-157Official
25	Lauren	Steinhaeuser	lauren.steinhaeuser@xcelenergy.com	Northern States Power Company dba Xcel Energy		414 Nicollet Mall, 401-08 Minneapolis MN, 55401 United States	Electronic Service		No	23-157Official
26	Emily	Suppes	emily.suppes@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	23-157Official
27	Amelia	Vohs	avohs@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 St. Paul MN, 55104 United States	Electronic Service		No	23-157Official