

PUBLIC COMMENT OPPOSING THE PROPOSED AMENDED ROUTE

Minnesota Energy Connection Project MPUC Docket No. E-002/TL-22-132

To the Minnesota Public Utilities Commission:

I respectfully submit this comment in strong opposition to Xcel Energy's request to amend the approved route permit for the Minnesota Energy Connection Project. The amended route would move a double-circuit 345-kV transmission line directly in front of my property and at the end of my driveway on County Road 4 — a location where my three young children will wait for their school bus each morning.

The Commission's own Order granting the original route (June 10, 2025) makes clear that the designated alignment was chosen specifically to **minimize human settlement impacts, avoid homes, mitigate safety risks, and protect children**, including in areas very similar to ours. The Proposed Amended Route does not meet these standards and should not be approved.

1. The Original Route Was Approved Because It Minimized Residential Impacts

The Commission's June 10, 2025 Order repeatedly shows that routing decisions were made to **avoid homes, homesteads, daycares, and driveways**. For example:

- To protect homes and a daycare on County Road 7, the Commission required the transmission line to cross the road to the opposite side:

"To further mitigate potential impacts on both homesteads and a daycare... the Commission will require the route alignment to cross over the road..."

- The Commission selected Route Segment 237 because it **avoided multiple residences**:

"Route Segment 237 avoids multiple residences..."

- The Order emphasizes that the chosen alignment is intended to **minimize potential impacts** relative to human settlement criteria under Minn. R. 7850.4100:

“The anticipated alignment is intended to minimize potential impacts...”

The Commission approved the original route precisely because it protected residential areas and child-occupied spaces.

The amended route reverses those protections.

2. The Amended Route Conflicts with Commission Routing Standards

Minn. R. 7850.4100 and Minn. Stat. 216E require routes to:

- minimize human settlement impacts,
- avoid residential concentrations,
- mitigate safety risks,
- consider public services such as school transportation.

The Commission reiterated this in its findings:

“Route permit determinations are guided by... minimizing human settlement and other land use conflicts...”

The amended route **moves the transmission line closer to multiple homes**, closer to driveways, closer to daily-use areas, and directly adjacent to school bus waiting zones — the opposite of minimizing human settlement impact.

3. The Amended Route Is Inconsistent With the Commission’s Prior Decisions to Protect Children and Sensitive Uses

The Commission explicitly protected child-occupied areas in the original routing process. Most notably:

“To further mitigate potential impacts on both homesteads and a daycare... the Commission will require the alignment to cross over the road...”

This establishes a clear precedent:

When a transmission line threatens residences or child-centered land uses, the Commission requires the alignment to shift away — not closer.

Yet Xcel's amended route would place a 345-kV line directly in front of my driveway **where my three children will wait for their school bus every morning.**

This is inconsistent with the Commission's own precedent and child-safety standards.

4. Children and School Bus Safety Are Directly Impacted

County Road 4 is a school bus corridor. Families use the ends of their driveways or the roadside as bus stops. The amended route moves the transmission line:

- closer to where children gather in low-visibility morning hours,
- closer to winter bus pickup areas,
- into locations where children bike, walk, and play.

The original route avoided these impacts — the amended route creates them.

5. Community Members Had No Voice in Landowner Negotiations

Xcel asserts that “all landowners within the Project footprint have agreed” to the amended route. This overlooks the many families **living near** the alignment who do not own the affected parcels and were not consulted.

The Commission has already recognized that public comments provide “critical information” and must be considered when evaluating route changes:

“Public comments provide valuable insights... and reduce potential adverse impacts as fully as possible.”

These families — including mine — deserve protection under the same standards applied in the original route approval.

5A. Tile Damage and Field Compaction Are Already Covered Under the Original Permit and Cannot Justify Residential Impacts

The original Route Permit already *requires* Xcel to repair or compensate for tile damage and compaction-related impacts. Section 5.3.20 states:

“The Permittee shall fairly restore or compensate landowners for damage to **crops... private roads and lanes... drain tile, or other damages sustained during construction.**”

This includes rutting, soil compaction, and equipment damage.

Tile damage and compaction are **ordinary, anticipated impacts** already addressed by the permit. They cannot be used to justify shifting a 345-kV line closer to homes, driveways, and school bus pickup points. Tile convenience is not a lawful or reasonable basis for increasing human settlement impact.

6. The Amended Route Does Not Meet the Requirement for “Comparable Overall Impacts”

The Order permits only minor within-route adjustments **if impacts remain comparable**:

“Any right-of-way or alignment modifications... shall be located so as to have comparable overall impacts...”

The amended route increases:

- residential proximity,
- child exposure,
- school bus safety risk,
- visual impact,
- roadway corridor impacts.

Therefore, it does **not** meet the requirement for comparable impacts and should be rejected.

7. Request to the Commission

For the reasons stated above, I respectfully request the Commission to:

1. **Deny Xcel Energy's request for a Route Permit Amendment**, as it increases impacts to children, families, and multiple residences along County Road 4.
2. Require Xcel to **retain the originally approved route**, which satisfied all routing criteria and was chosen to minimize residential and child-related impacts.
3. Recognize that the Proposed Amended Route conflicts with multiple Commission findings from the June 10, 2025 Order and fails to maintain comparable overall impacts as required under Minn. R. 7850.4100.

The proposed amendment would undo the protective decisions the Commission already made. It increases human settlement impact, increases child safety risks, and contradicts the core principles of Minnesota routing law.

Respectfully submitted,

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11.26.2025