

May 12, 2025

—Via Electronic Filing—

The Honorable Ann O'Reilly  
Administrative Law Judge  
Office of Administrative Hearings  
P.O. Box 64620  
St. Paul, MN 55164-0620

RE: *Rebuttal Testimony and Schedules of Ellen Heine*  
IN THE MATTER OF THE APPLICATION FOR A ROUTE PERMIT FOR THE  
MANKATO – MISSISSIPPI RIVER 345 kV TRANSMISSION LINE PROJECT  
IN SOUTHEAST MINNESOTA  
Docket No. E002/TL-23-157  
OAH Docket No. 65-2500-40099

Dear Judge O'Reilly:

Northern States Power Company, doing business as Xcel Energy, respectfully submits the following documents in the above-referenced docket:

- Rebuttal Testimony and Schedules of Ellen Heine

We have electronically filed these documents with the Minnesota Public Utilities Commission. As requested in the Second Prehearing Order, we will be providing you with a paper courtesy copy by U.S. Mail. Please contact me at 612-2168274 or [lauren.steinhaeuser@xcelenergy.com](mailto:lauren.steinhaeuser@xcelenergy.com) if you have any questions regarding this filing.

Sincerely,

/s/ *Lauren Steinhaeuser*

LAUREN STEINHAEUSER  
ASSISTANT GENERAL COUNSEL  
NORTHERN STATES POWER COMPANY

Enclosures  
cc: Service List

Rebuttal Testimony and Schedules  
Ellen Heine

Before the Minnesota Public Utilities Commission  
State of Minnesota

In the Matter of the Application for a Route Permit for the Mankato – Mississippi  
River 345 kV Transmission Line Project in Southeast Minnesota

Docket No. E002/TL-23-157  
OAH Docket No. 65-2500-40099

**Rebuttal Testimony of Ellen Heine  
on behalf of Northern States Power Company,  
doing business as Xcel Energy**

May 12, 2025

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## Schedules

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Affidavit of Mailing of Notice to Affected Landowners	Schedule 6

1 **I. INTRODUCTION**

2

3 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

4 A. My name is Ellen Heine, and my business address is 401 Nicollet Mall,  
5 Minneapolis, Minnesota 55401.

6

7 Q. HAVE YOU PREVIOUSLY PROVIDED TESTIMONY IN THIS PROCEEDING?

8 A. Yes. I filed Direct Testimony on behalf of Northern States Power Company,  
9 doing business as Xcel Energy (Xcel Energy) in support of Xcel Energy's  
10 Route Permit Application (Application) with the Minnesota Public Utilities  
11 Commission (Commission) for the Mankato – Mississippi 345 kV  
12 Transmission Project (Project).

13

14 Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

15 A. The purpose of my Rebuttal Testimony is to provide testimony regarding the  
16 Company's May 5, 2025 filing requesting to expand the route width for  
17 portions of Route Option 2 North and Route Option 2 South near the North  
18 Rochester Substation. A copy of this May 5th filing is provided as **Schedule**  
19 **5**. I will also discuss the Company's efforts to notify affected landowners of  
20 this request.

21

22 **II. REQUESTED ROUTE WIDTH EXPANSION**

23

24 Q. WHY DID THE COMPANY RECENTLY REQUEST A ROUTE WIDTH EXPANSION  
25 FOR PORTIONS OF ROUTE OPTION 2 NORTH AND ROUTE OPTION 2 SOUTH?

26 A. When the Company filed the Application in April 2024, the Company  
27 proposed placing the new 345 kV transmission line for the Project on the

1 open position of the existing Hampton – North Rochester 345 kV double-  
2 circuit capable transmission structures on the eastern ends of Route Option 2  
3 North and Route Option 2 South. In December 2024, the Midcontinent  
4 Independent System Operator, Inc. approved its Long Range Transmission  
5 Planning Tranche 2.1, which added a second 345 kV circuit onto the existing  
6 Hampton – North Rochester 345 kV transmission line. This additional 345  
7 kV transmission line project will use the open position on the existing double-  
8 circuit capable structures preventing the Project's 345 kV line from being  
9 double-circuited with the existing line as proposed in the Application. As a  
10 result, portions of Route Option 2 North and Route Option 2 South will need  
11 to be constructed adjacent to the exiting Hampton – North Rochester 345 kV  
12 transmission line in a new right-of-way rather than double-circuiting with the  
13 existing line.

14  
15 Q. PLEASE DESCRIBE THE PROPOSED ROUTE WIDTH EXPANSION.

16 A. In the Application, the Company requested a route of 1,000 feet (500 feet to  
17 either side of the proposed centerline). While most of the right-of-way needed  
18 to construct the new 345 kV line parallel to the existing Hampton – North  
19 Rochester 345 kV line will fit within the route width included in the  
20 Application, there is one location where the requested new right-of-way bears  
21 south and deviates from being parallel to the existing line and would extend  
22 beyond the route width included in the Application. This is because there is a  
23 residence located south of the existing line and there is not enough space  
24 between the residential buildings and the existing line to construct a new  
25 parallel transmission line. Routing north of this residence is not proposed  
26 because it would require crossing over the top of the existing 345 kV line and  
27 then crossing back over the existing 345 kV line to be south to enter the North

1 Rochester Substation. Crossing over the existing 345 kV line would require  
2 significantly taller structures as compared to the existing structures. In  
3 addition, line crossings create unique safety, reliability, and resiliency concerns  
4 and thus Xcel Energy tries to minimize new line crossings to the extent  
5 practical. In this location, Xcel Energy requests that the route width be  
6 expanded to include area within 500 feet of the new proposed transmission  
7 centerline. Maps of the proposed change were provided as Attachment A to  
8 the Company's May 5th filing, which is provided as **Schedule 5** to my  
9 testimony.

10  
11 Q. DID THE COMPANY ANALYZE THE POTENTIAL ENVIRONMENTAL IMPACTS  
12 ASSOCIATED WITH ITS REQUESTED EXPANDED ROUTE WIDTH AREA?

13 A. Yes. The Company analyzed environmental and related data associated with  
14 the requested expanded route width area. A summary of this environmental  
15 analysis was provided as Attachment B to the Company's May 5th filing,  
16 which is provided as **Schedule 5**.

17  
18 Q. DID XCEL ENERGY NOTIFY POTENTIALLY AFFECTED LANDOWNERS OF ITS  
19 REQUEST TO EXPAND THE ROUTE WIDTH AND REVISE THE ALIGNMENT FOR  
20 ROUTE OPTION 2 NORTH AND ROUTE OPTION 2 SOUTH?

21 A. Yes. The Company sent mailed notice to the 46 affected landowners of the  
22 proposed route width expansion and revised alignment. This mailing included  
23 information about the Company's request, information about the upcoming  
24 public hearings, an overview map, and individualized maps for each  
25 landowner's parcel(s). A representative copy of this mailing, the mailing list,  
26 and the affidavit of mailing is attached as **Schedule 6**.

### III. CONCLUSION

1

2

3 Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

4 A. Yes.



May 5, 2025

—Via Electronic Filing—

Richard Davis  
Environmental Review Manager  
Energy Environmental Review and Analysis  
Minnesota Department of Commerce  
85 7th Place East, Suite 280  
Saint Paul, MN 55101

**RE: Request to Expand Route Width**

IN THE MATTER OF THE APPLICATION FOR A ROUTE PERMIT FOR THE  
MANKATO TO MISSISSIPPI RIVER 345 kV TRANSMISSION PROJECT IN  
SOUTHEAST MINNESOTA  
Docket No. E002/TL-23-157  
OAH Docket No. 65-2500-40099

Dear Mr. Davis:

Northern States Power Company, doing business as Xcel Energy, respectfully submits the following request to expand the route width for portions of proposed Route Option 2 North and Route Option 2 South for the Mankato to Mississippi River 345 kilovolt (kV) Transmission Project (MMRT or Project) in the above-referenced docket. Xcel Energy requests that the route width be expanded so that the new 345 kV transmission line can be constructed adjacent to the existing Hampton – North Rochester 345 kV transmission line in new right-of-way rather than double-circuiting with this existing line (see **Attachment A, Figures 1 and 2**).

As discussed below, this change is needed because one of the transmission projects that was recently approved by the Midcontinent Independent Transmission Operator, Inc. (MISO) as part of its Long Range Transmission Planning (LRTP) Tranche 2.1 involves adding a second 345 kV circuit to the existing Hampton to North Rochester 345 kV transmission line (Line 0964). As a result, the proposed MMRT 345 kV line cannot be double-circuited with this existing line as proposed in the Route Permit Application (Application) that was filed in April 2024,<sup>1</sup> and needs to be constructed in a separate alignment.

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<sup>1</sup> *In the Matter of the Application of Xcel Energy for a Route Permit for the Mankato – Mississippi River 345 kV Transmission Line Project in Southeast Minnesota*, Docket No. E002/TL-23-157, APPLICATION FOR CERTIFICATE OF NEED AND ROUTE PERMIT FOR MANKATO – MISSISSIPPI RIVER TRANSMISSION PROJECT (April 2, 2024).

Xcel Energy respectfully requests that the Route Permit for this Project include this expanded route width and that Department of Commerce, Energy Environmental Review and Analysis (DOC-EERA) analyze this expanded route width in the final EIS. To help facilitate inclusion of this requested change in the EIS, Xcel Energy has completed an environmental analysis of this expanded route width area and a comparison of the revised right-of-way (ROW) to the ROW proposed in the Application for portions of Route Option 2 North and 2 South.

Xcel Energy will be sending mailed notice of this proposed change to affected landowners and will provide them with information about how to provide comments on the Project and this requested change.

Following is a more detailed summary of the reasons for this request, a description of the revised route width and the associated revised ROW and transmission line alignment, and a summary comparison of the environmental impacts of this change as compared to what was proposed in the Application.

### **Reason for Request to Expand the Route Width**

At the time the Application for the Project was filed in April 2024, Xcel Energy was proposing to place the new 345 kV transmission line on the open position on the existing Hampton – North Rochester 345 kV double-circuit capable transmission structures on the eastern ends of Route Option 2 North and Route Option 2 South.<sup>2</sup> The proposed 345/345 kV double-circuit portions of Route Option 2 North and Route Option 2 South were approximately 7.05 miles and 2.49 miles in length, respectively (the southern 2.49 miles of Route Option 2 North is a common segment with Route Option 2 South).

In December 2024, MISO approved its LRTP Tranche 2.1 portfolio of projects. One of the projects that was approved was the Pleasant Valley – North Rochester – Hampton Corner 345 kV transmission project (project ID No. 25). The North Rochester – Hampton Corner portion of this project involves adding another 345 kV transmission line on the existing double-circuit capable structures constructed as part of the Hampton – La Crosse 345 kV transmission project. As such, portions of Route Option 2 North and Route Option 2 South need to be constructed parallel to the existing 345 kV transmission line in new ROW rather than being double-circuited with this line.

### **Description of the Requested Expanded Route Width**

In the Application, Xcel Energy requested a typical route with of 1,000 feet (500 feet to either side of the proposed centerline). While most of the ROW for the requested change will fit within the route width included in the Application, there is one location where the requested new ROW bears south and deviates from being parallel to the

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<sup>2</sup> Segments 2C and 2D.

existing line and would extend beyond the route width included in the Application as shown in **Attachment A, Figure 2**. This is because there is a residence located south of the existing line and there is not enough space between the residential buildings and the existing line to construct a new parallel transmission line. Routing north of this residence is not proposed because it would require crossing over the top of the existing 345 kV line and then crossing back over the existing 345 kV line to be south to enter the North Rochester Substation. Crossing over the existing 345 kV line would require significantly taller structures as compared to the existing structures. In addition, line crossings create unique safety, reliability, and resiliency concerns and thus Xcel Energy tries to minimize new line crossings to the extent practical.

In this location, Xcel Energy requests that the route width be expanded to include area within 500 feet of the new proposed transmission centerline as shown in **Attachment A, Figures 1 and 2**.

### Environmental Analysis of the Requested Change

Xcel Energy analyzed environmental and related data associated with the requested expanded route width area.<sup>3</sup> A summary of the size of the requested change is included in **Table 1** below. The environmental data reviewed is similar to what was included in the Application and is summarized below and in the tables included in **Attachment B, Attachment A, Figures 2-7** include the location of environmental resources associated with this analysis. Land use within the revised ROW is summarized in **Attachment B, Tables 2 and 3**.

**Table 1. Size of Requested Change**

	Route Option 2 North	Route Option 2 South
Length (miles)	7.05	2.49
Total ROW area (acres)	128.3	45.4
Expanded Route Width (acres)	24.6	24.6

#### *Residences*

In addition to related human settlement topics discussed in the Application, Xcel Energy summarizes residence information of the expanded route width and new proposed ROW (see **Attachment B, Table 1**). No new residences were identified within the expanded route width (see **Attachment A, Figures 2-5**). For Route Option 2 North, there are two fewer residences located within 500 feet of the revised centerline as compared to the centerline proposed in the Application. For Route Option 2 South,

<sup>3</sup> Note that since the expanded route width is a relatively small area, many of the environmental resources and impacts discussed in the Application still apply and few changes were identified in assessing this expanded route width area.

there are the same number of residences within 500 feet of the revised centerline as compared to the centerline proposed in the Application.

#### *Water Resources*

Xcel Energy conducted a review of National Wetland Inventory (NWI) (Minnesota Department of Natural Resources 2019) and related water resources data of the proposed expanded route width and new ROW associated with this request. With the exception of one additional wetland, no new water resources were identified in this review (see **Attachment A, Figures 3-5**, and **Attachment B, Tables 4 and 5**). There is one additional freshwater emergent wetland within the proposed expanded route width and associated new ROW as compared to the Application. Impacts would either be avoided by spanning the wetland or by slightly revising the route to avoid this wetland if this route is selected. All other natural environment effects from the proposed new route width and ROW are expected to be similar to those identified in the Application.

#### *Rare and Unique Natural Resources, Wilderness Areas, and Parks and Natural Areas*

Updated reviews of USFWS Information for Planning and Consultation (IPaC) data and Minnesota Department of Natural Resources NHIS data (LA-2023-034) were performed for the proposed expanded route width and new ROW associated with this request. No new rare and unique resources, wilderness areas, or parks and natural areas were identified in this review and there is no change to impacts assessment included in the Application. See **Attachment A, Figures 3-5**, and **Attachment B, Tables 4 and 5**.

#### *Cultural Resources*

The expanded route width and revised proposed ROW would not impact any new archaeological sites or historic properties as compared to the Application. Thus, there is no change in the impacts or recommendations filed in Application.<sup>4</sup> Identified sites are shown in **Attachment A, Figure 7** and summarized in **Attachment B, Tables 4 and 5**.

### **Conclusion**

Environmental analysis of Xcel Energy's proposed request to expand the route width indicates minimal and minor changes to affected environmental resources. Xcel Energy will contact landowners impacted by this proposed change to notify them of this request and inform them of the opportunity to comment on the Project.

Xcel Energy respectfully requests that the Route Permit for this Project include this expanded route width and that DOC-EERA analyze this expanded route width in the final EIS.

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<sup>4</sup> Application at 239-240.

We have electronically filed this document with the Commission. Copies are also being served on persons on the attached service list. Please contact me at 612-330-6073 or [ellen.l.heine@xcelenergy.com](mailto:ellen.l.heine@xcelenergy.com) if you have any questions regarding this filing.

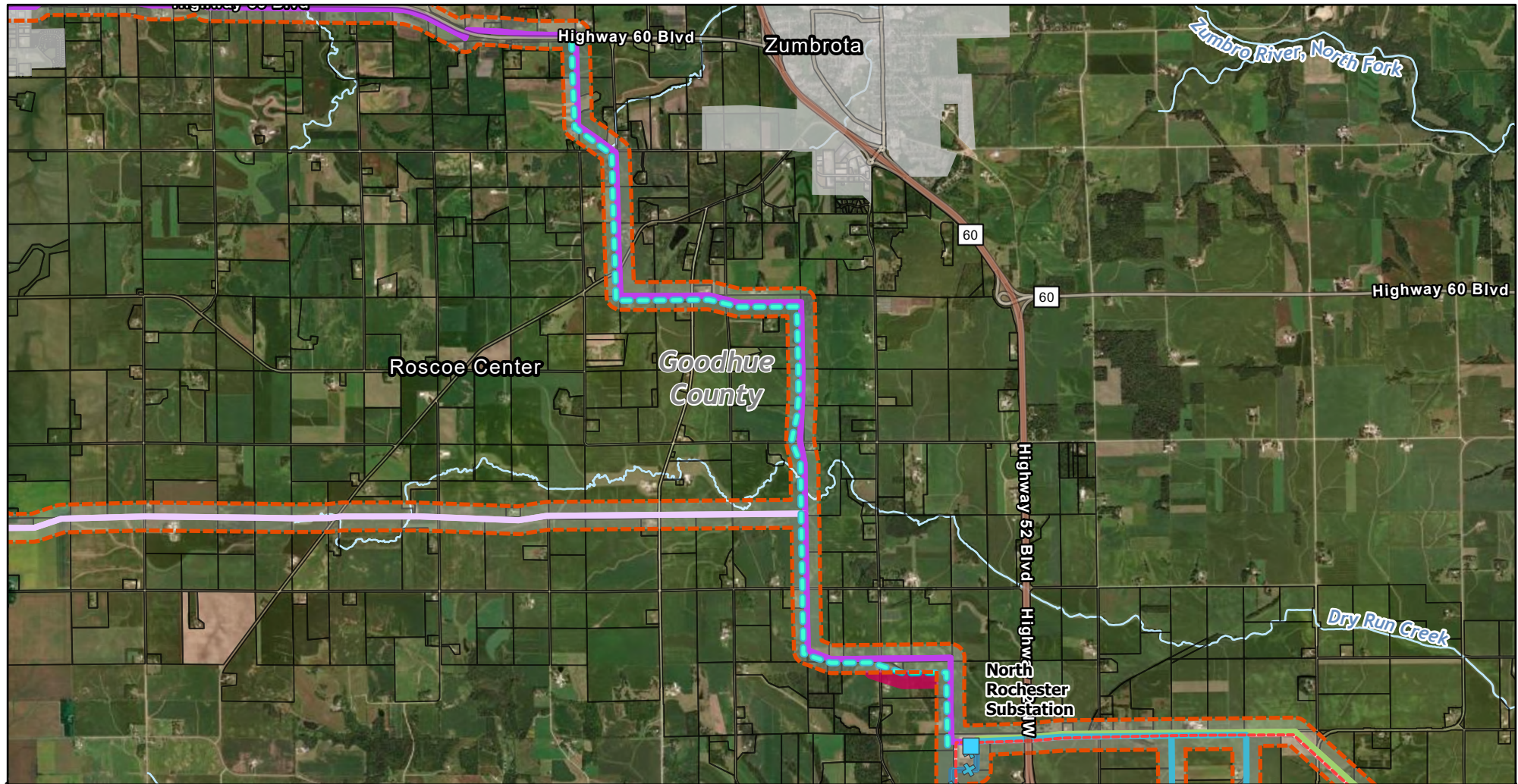
Sincerely,

*/s/ Ellen L. Heine*

ELLEN L. HEINE  
PRINCIPAL SITING AND PERMITTING AGENT  
NORTHERN STATES POWER COMPANY

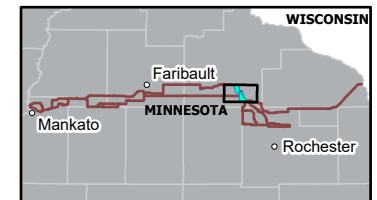
cc: Service List

**FIGURE 1 OVERVIEW OF REQUESTED CHANGE TO ROUTE OPTIONS 2 NORTH AND 2 SOUTH**



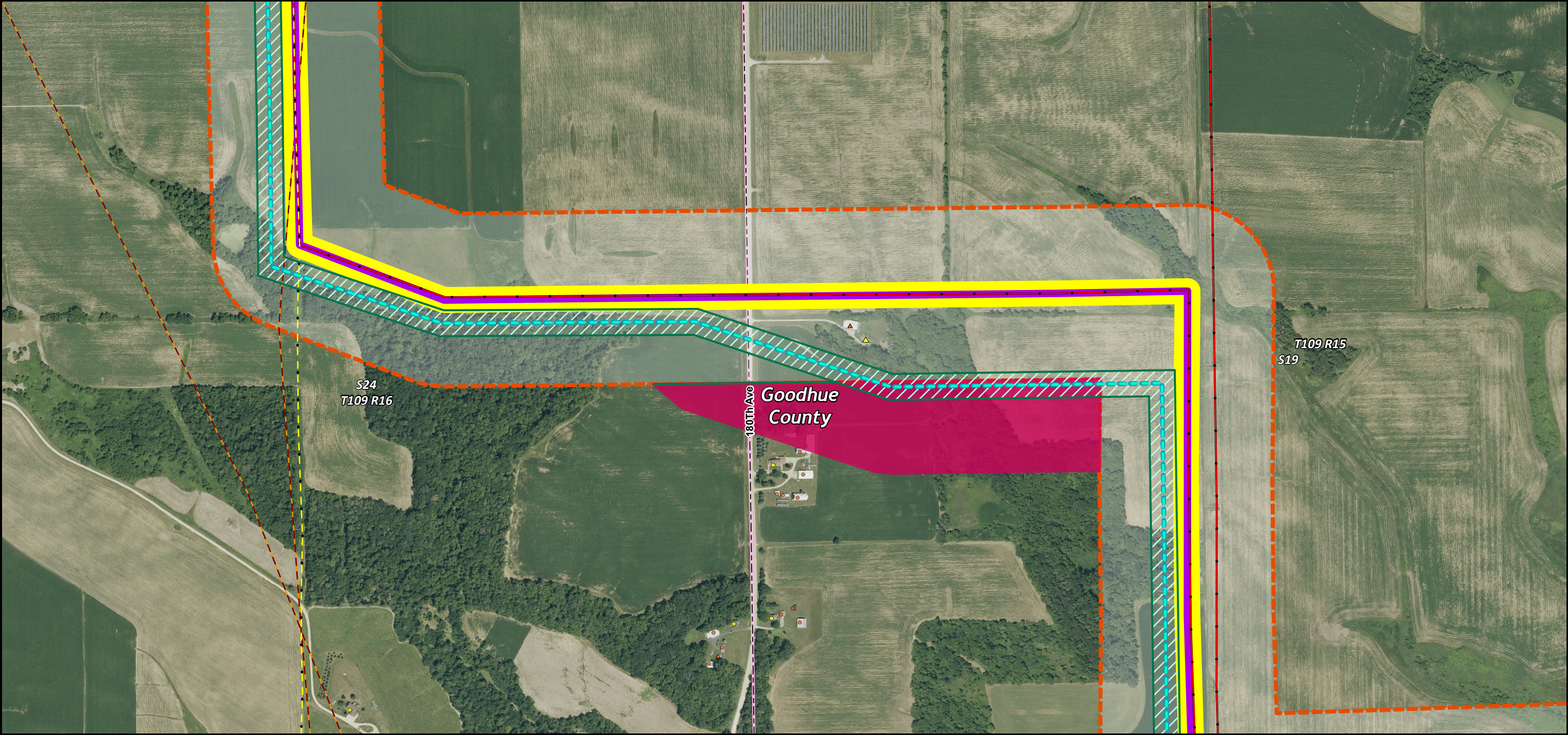
**LEGEND**

- |                              |   |                            |
|------------------------------|---|----------------------------|
| Project Substation           | 4 West - A (Route Segment 13)           | RPA Route Width            |
| <b>Proposed Route Option</b> |   |                            |
| 2 North                      | EIS Scoping Alignment/Route Alternative | Parcel                     |
| 2 South                      | Revision to Route Option 2              | Route Width Expansion Area |
| 3                            |   |                            |
| 4 East                       |   |                            |
| 4 West                       |   |                            |



MINNESOTA COUNTIES: GOODHUE, WABASHA, BLUE EARTH, WINONA, DODGE, OLMSTED, LE SUEUR, RICE, AND WASECA

FIGURE 2: ROUTE WIDTH EXPANSION AREA



**LEGEND**

Proposed Route

Proposed Right-of-Way

Pipeline in Study Area (NPMS)

Existing Transmission Line

69 kV

345 kV

Township Boundary

**Structure in Proposed Route**

Residence

Not a residence

**Structure Outside Proposed Route**

Residence

Not a residence

**Proposed Route Option**

2 North

Route Width Expansion Area

Revision to Route Option 2 Right-of-Way

Revision to Route Option 2

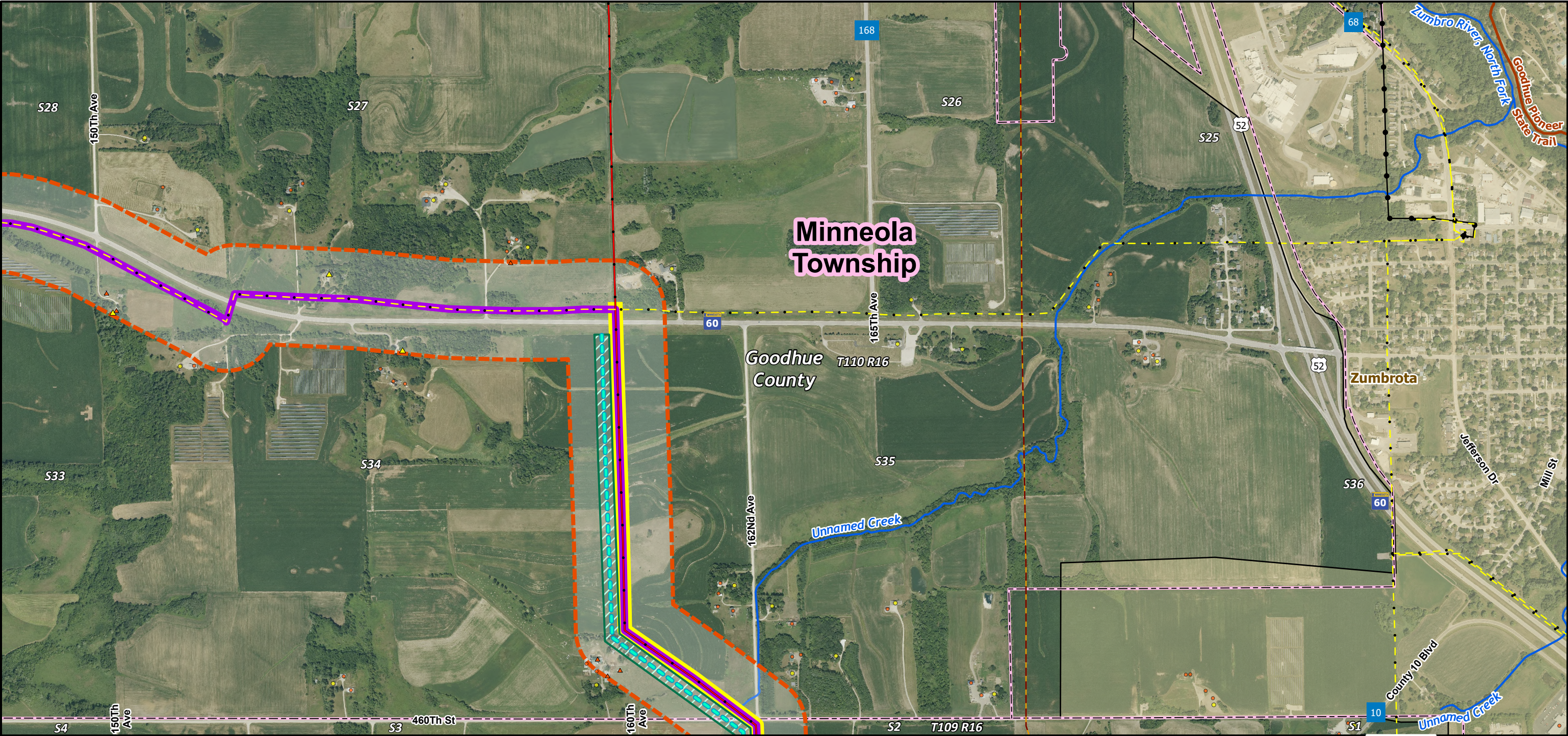
Project Substation

MINNESOTA

1 inch equals 2,000 feet 1:24,000

0 Miles 0.25

**FIGURE 3: DETAIL MAPS OF REQUESTED CHANGE TO ROUTE OPTIONS 2 NORTH AND 2 SOUTH**



**LEGEND**

Proposed Route

Proposed Right-of-Way

Pipeline in Study Area (NPMS)

Existing Transmission Line

69 kV

345 kV

Unknown

Township Boundary

Public Water Watercourse

**Structure in Proposed Route**

Residence

Not a residence

**Structure Outside Proposed Route**

Residence

Not a residence

**Proposed Route Option**

2 North

Route Width Expansion Area

Revision to Route Option 2 Right-of-Way

Revision to Route Option 2

Project Substation

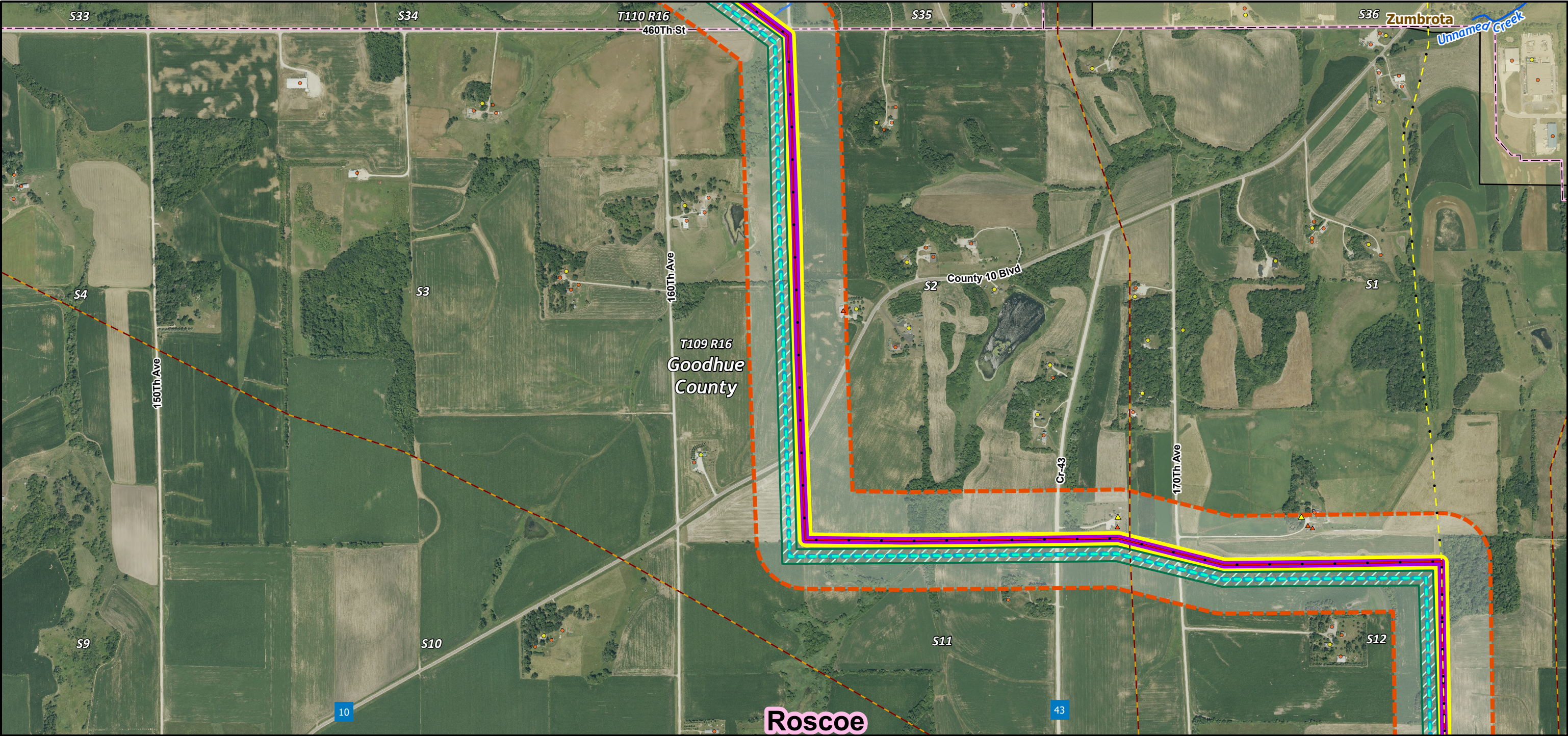
Page 1 of 4

MINNESOTA

1 inch equals 2,000 feet 1:24,000

0 Miles 0.5

FIGURE 3: DETAIL MAPS OF REQUESTED CHANGE TO ROUTE OPTIONS 2 NORTH AND 2 SOUTH



**LEGEND**

Proposed Route

Proposed Right-of-Way

Pipeline in Study Area (NPMS)

Existing Transmission Line

69 kV

345 kV

Township Boundary

Public Water Watercourse

**Structure in Proposed Route**

Residence

Not a residence

**Structure Outside Proposed Route**

Residence

Not a residence

**Proposed Route Option**

2 North

Route Width Expansion Area

Revision to Route Option 2 Right-of-Way

Revision to Route Option 2

Project Substation

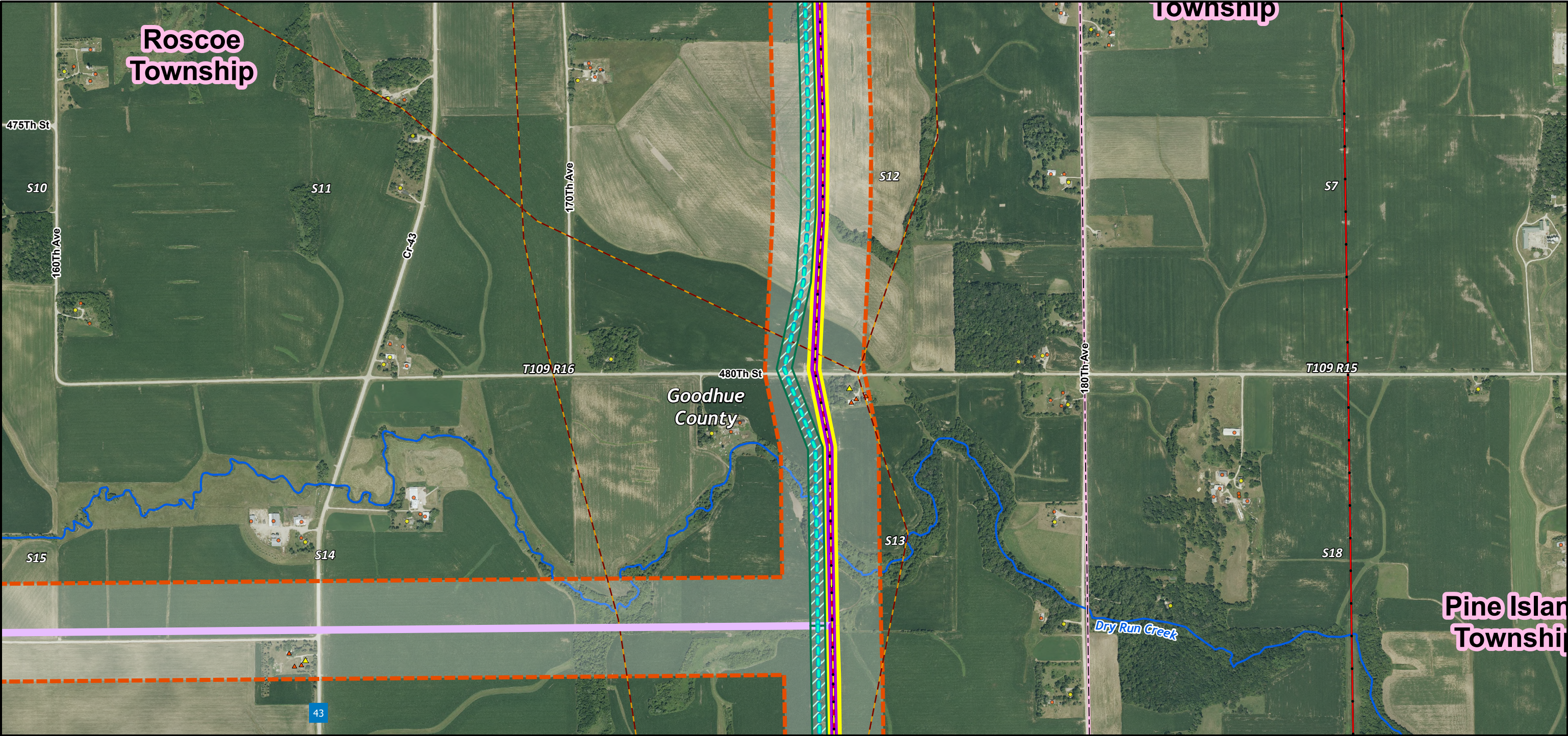
Page 2 of 4

1 inch equals 2,000 feet 1:24,000

0 Miles 0.5

Imagery Source: NAIP 2023

**FIGURE 3: DETAIL MAPS OF REQUESTED CHANGE TO ROUTE OPTIONS 2 NORTH AND 2 SOUTH**



**LEGEND**

Proposed Route

Proposed Right-of-Way

Pipeline in Study Area (NPMS)

Existing Transmission Line

69 kV

345 kV

Township Boundary

Public Water Watercourse

**Structure Outside Proposed Route**

Residence

Not a residence

**Structure in Proposed Route**

Residence

Not a residence

**Proposed Route Option**

2 North

2 South

Route Width Expansion Area

Revision to Route Option 2 Right-of-Way

Revision to Route Option 2

Project Substation

Page 3 of 4

MINNESOTA

1 inch equals 2,000 feet 1:24,000

0 Miles 0.5

DATE EXPORTED: 5/2/2025

Imagery Source: NAIP 2023

**FIGURE 3: DETAIL MAPS OF REQUESTED CHANGE TO ROUTE OPTIONS 2 NORTH AND 2 SOUTH**

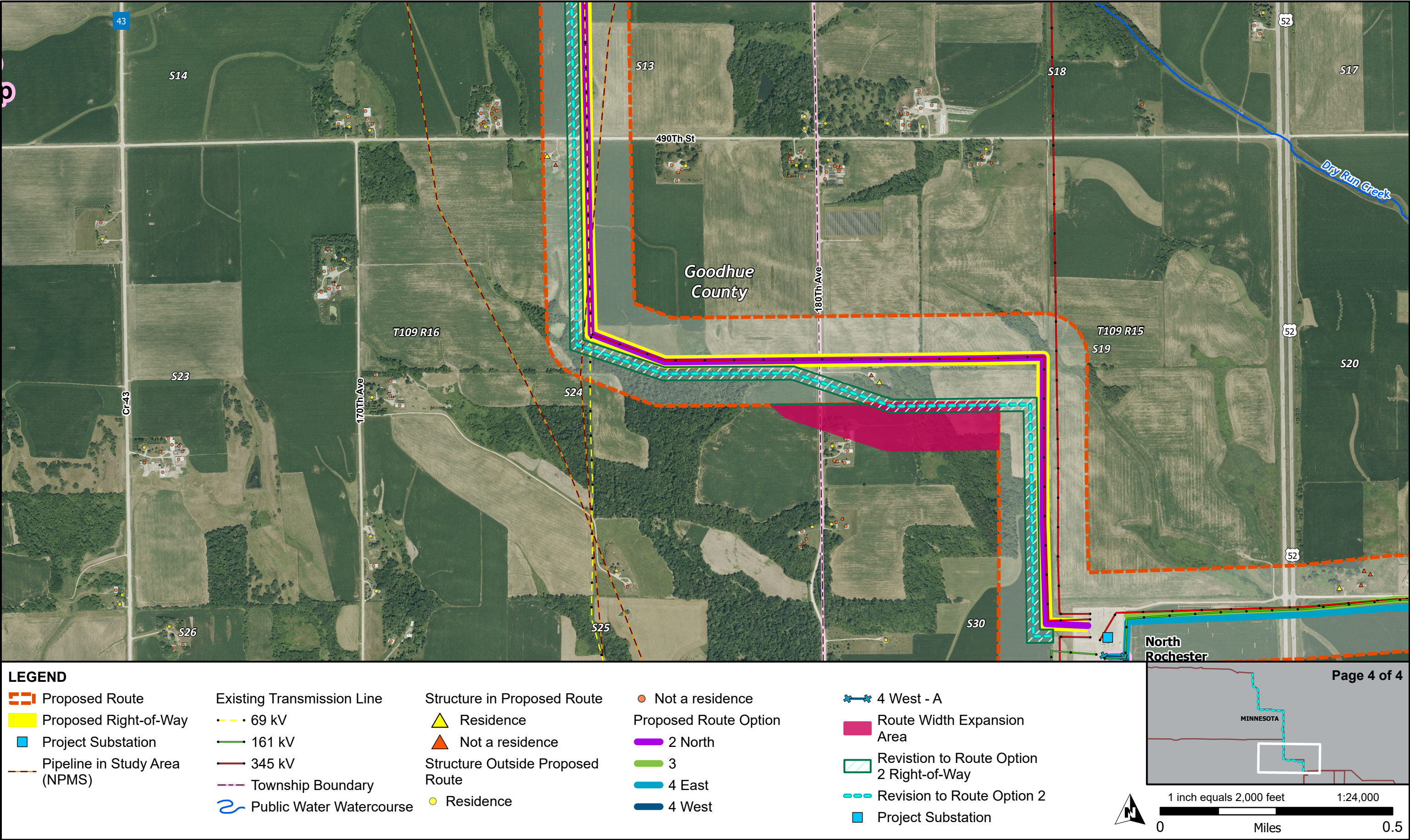
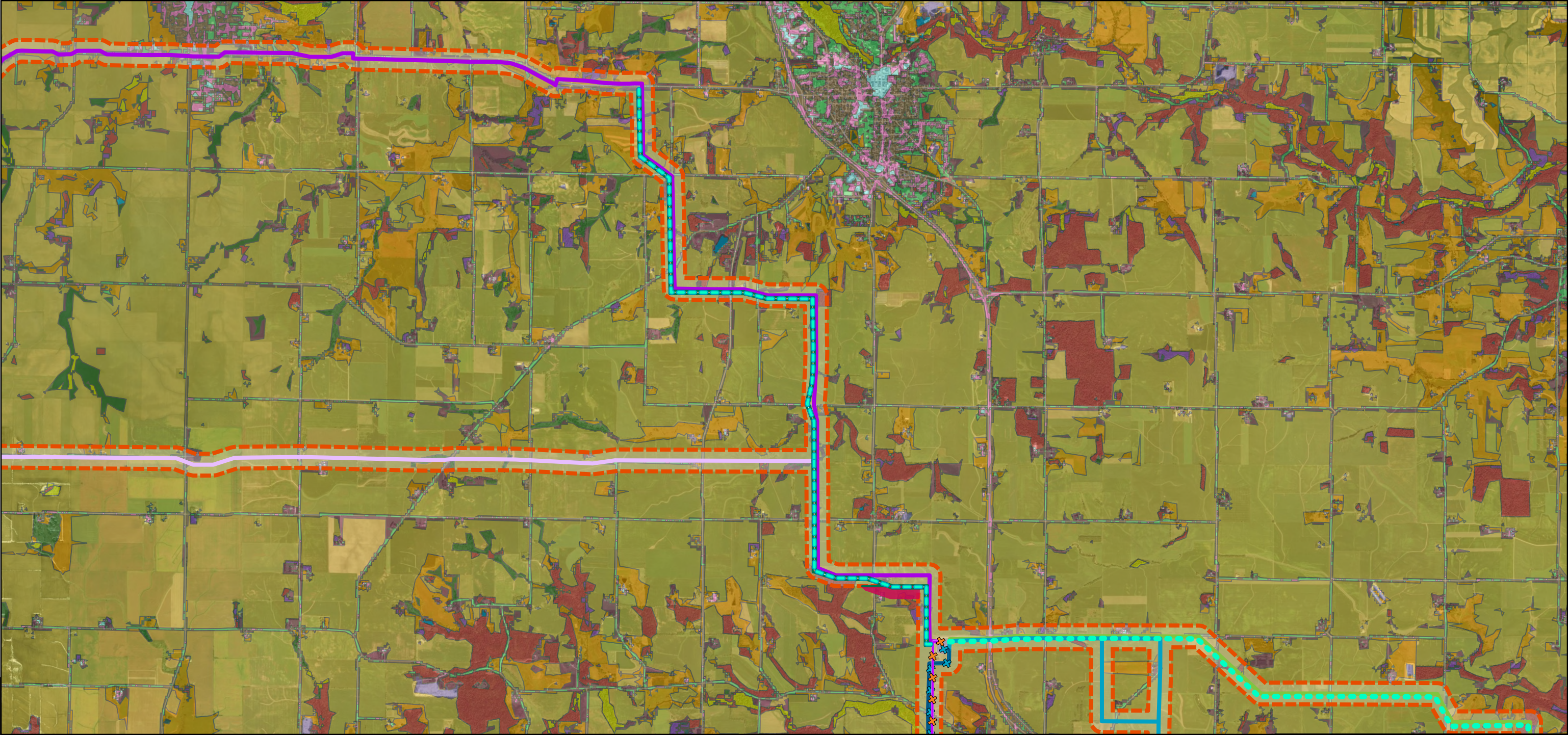


FIGURE 4: NLCD LAND COVER

FEB 28TH, 2025 



**LEGEND**

Proposed Route Option

- 2 North
- 2 South
- 3
- 4 East
- 4 West
- 4 West - A

- Alternative
- Hwy 14
- Proposed Route
- Route Width Expansion Area
- Revision to Route Option 2 Right-of-Way

Revision to Route Option 2

NLCD 2021 Landuse Description

- Barren Land (Rock/Sand/Clay)
- Cultivated Crops
- Deciduous Forest

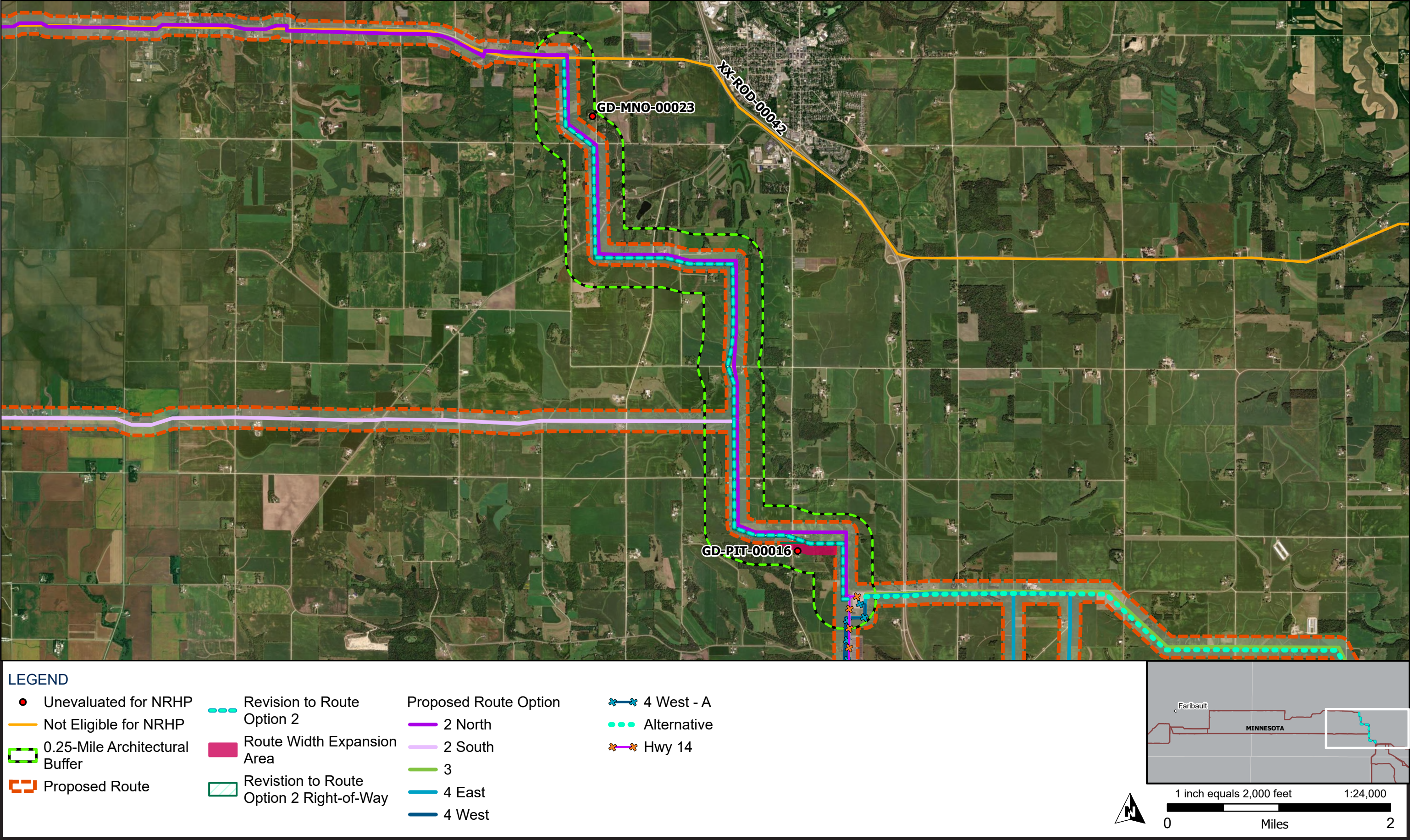
- Developed, High Intensity
- Developed, Low Intensity
- Developed, Medium Intensity
- Developed, Open Space
- Emergent Herbaceous Wetlands
- Evergreen Forest
- Grassland/Herbaceous
- Hay/Pasture
- Mixed Forest
- Open Water
- Shrub/Scrub
- Woody Wetlands



1 inch equals 2,000 feet 1:24,000

0 Miles 2

FIGURE 5: CULTURAL RESOURCES



**Table 1. Proximity of Residences to Proposed Centerline**

<b>Residence Proximity (ft.)</b>	<b>Route Option 2 North (Application)</b>	<b>Route Option 2 North (New Proposed ROW)</b>	<b>Route Option 2 South (Application)</b>	<b>Route Option 2 South (New Proposed ROW)</b>
0-75	0	0	0	0
76-150	1	0	0	0
151-300	2	0	1	1
301-500	2	3	1	1
<b>Total Residences</b>	<b>5</b>	<b>3</b>	<b>2</b>	<b>2</b>

**Table 2. Route Option 2 North: Land Use and ROW**

<b>Criteria</b>	<b>New Proposed ROW</b>	<b>Application ROW</b>	<b>Other Information Important to this Request</b>
Number of parcels crossed	34 Parcels	49 Parcels	Fifteen fewer parcels will be crossed compared to the Application.
Number of residences within the right-of-way (ROW)	0	0	No change from Application.
Wetland acreage within the ROW	5.22 acres	4.08 acres	Increase 1.14 acres from Application.
Cultivated Crops acreage within the ROW	99.81 acres	107.25 acres	Reduction of 7.44 acres from Application.
Pasture/Hay acreage within the ROW	13.64 acres	9.27 acres	Increase of 4.37 acres from Application.
Deciduous Forest acreage within the ROW	5.68 acres	1.61 acres	Increase of 4.07 acres from Application.
Mixed Forest acreage within the ROW	1.22 acres	1.39 acres	Minor reduction of 0.17 acres from Application.
Barren Land (Rock/Sand/Clay) acreage within the ROW	0.00 acres	0.55 acres	Minor reduction of 0.55 acres from Application.
Grassland/Herbaceous acreage within the ROW	5.04 acres	7.35 acres	Reduction of 2.31 acres from Application.
Developed land acreage within the ROW	2.89 acres	3.28 acres	Minor reduction of 0.39 acres compared to Application.
Transmission line linear feet across waterbodies or watercourses	Approximately 15 feet	Approximately 15 feet	No change from Application.
Acreage of parks, Wildlife Management Areas, and Waterfowl Production Areas within the ROW	0	0	No change from Application.

Criteria	New Proposed ROW	Application ROW	Other Information Important to this Request
Number of protected or listed species within the ROW	State (0) Federal (5)	State (0) Federal (5)	No change from Application.
Number of archaeological resources within the ROW	0	0	No change from Application.

**Table 3. Route Option 2 South: Land Use and ROW**

Criteria	New Proposed ROW	Application ROW	Other Information Important to this Request
Number of parcels crossed	15 Parcels	18 Parcels	Three fewer parcels crossed compared to the Application.
Number of residences within the right-of-way (ROW)	0	0	No change from the Application.
Wetland acreage within the ROW	3.35 acres	3.79 acres	Minor reduction of 0.44 acres from the Application.
Cultivated Crops acreage within the ROW	44.08 acres	47.68 acres	Reduction of 3.6 acres from the Application.
Pasture/Hay	0.87 acres	0.55 acres	Minor increase of 0.32 acres from the Application.
Deciduous Forest	3.10 acres	0.59 acres	Increase of 2.51 acres from the Application.
Mixed Forest	1.21 acres	1.05 acres	Minor increase of 0.16 acres from the Application.
Barren Land (Rock/Sand/Clay)	0.00 acres	0.55 acres	Minor reduction of 0.55 acres from the Application.
Grassland/Herbaceous acreage within the ROW	2.17 acres	2.50 acres	Minor decrease of 0.33 acres from the Application.
Developed land	0.75 acres	0.68 acres	Minor increase of 0.07 acres from the Application.
Transmission line linear feet across waterbodies or watercourses	0	0	No change from Application.
Acreage of parks, Wildlife Management Areas, and Waterfowl Production Areas within the ROW	0	0	No change from Application.
Number of protected or listed species within the ROW	State (0) Federal (5)	State (0) Federal (5)	No change from Application.
Number of archaeological resources within the ROW	0	0	No change from Application.

**Table 4. Comparison of Resource Impacts of Proposed New ROW for Route Option 2 North**

<b>Routing Factor Minn. Rules 7850.1900 subp. 3 and Minn. Rules 7850.4100</b>	<b>Impacts Resulting from Expanded Route Width and Proposed New ROW</b>
Effects on human settlement, including noise and aesthetics	No new residences were identified within the expanded route width. There are two fewer residences located within 500 feet of the revised centerline as compared to the centerline proposed in the Application.
Effects on displacement, cultural values, recreation, and public service	No change from the Application.
Effects on public health and safety	No change from the Application.
Effects on transportation including roadways, railroads, and airports/airstrips	No change from the Application
Effects on land-based economies, including agriculture, forestry, tourism, and mining	Because the requested new ROW would involve placing transmission facilities on this route within agricultural use areas, impacts to agricultural land use will occur. Fewer acres of cultivated land will be crossed by the revised ROW as compared to the ROW proposed in the Application. For the remaining categories, no change is expected in comparison to the Application ROW.
Effects on archaeological and historic resources	The expanded route width and new proposed centerline and ROW would not impact any new archaeological sites or historic properties as compared to the Application, necessitating no change in the impacts or recommendations filed in Application.
Effects on the natural environment, including effects on air quality, water resources, and flora and fauna	An additional freshwater emergent wetland is within the proposed new ROW compared to the Application ROW. Impacts would either be avoided by spanning the wetland or slightly revising the route to avoid this wetland. All other natural environment effects from the proposed new ROW are expected to be similar to those identified in the Application ROW.
Effects on rare and unique natural resources	No change from the Application.
Application of design options that maximize energy efficiencies, mitigate adverse environmental effects, and could accommodate expansion of transmission or generating capacity	No change from the Application.

Routing Factor Minn. Rules 7850.1900 subp. 3 and Minn. Rules 7850.4100	Impacts Resulting from Expanded Route Width and Proposed New ROW
Use or paralleling of existing rights-of-way, survey lines, natural division lines, and agricultural field boundaries	The proposed new ROW will parallel the existing CapX2020 Hampton – North Rochester 345 kV transmission (Line 0964) and replaces the previous proposal to double-circuit with Line 0964. The proposed new ROW will be within 200 feet west of the existing Line 0964 ROW.
Use of existing large electric power generating plant sites	No change from the Application.
Use of existing transportation, pipeline, and electrical transmission systems or rights-of-way	The proposed new ROW will parallel the existing 345 kV line (Line 0964). The proposed new ROW will be within 200 feet west of the existing Line 0964. Some portions of the proposed ROW will be new and outside of the existing ROW.
Electrical system reliability	No change from Application.
Cost of constructing, operation and maintenance based on design and route	Constructing the new 345 kV transmission line adjacent to the existing 345 kV line rather than double-circuiting with the existing line (as proposed in the Application) will be more costly. This is due to an increase in land rights costs and the need to construct new single-circuit poles (v. using existing double-circuit poles with exiting line).
Human and natural environmental effects that cannot be avoided	See above related to impacts to residences. Approximately 82.9 acres of land would be converted to transmission line ROW.  Environmental effects are expected to be limited to some additional tree clearing, where applicable, for construction and operation of the Project.
Irreversible and irretrievable commitments of resources	No change from the Application.
Measures that might be implemented to mitigate the potential human and environmental impacts identified above the estimated costs of the mitigative measures	No change from the Application. Same mitigation measures proposed in the Application will be employed.
Wilderness areas: no high voltage transmission line may be routed through state or national wilderness areas (Minn. Rules 7850.4300)	No change from the Application. The requested new ROW and expanded route width are not located within state or national wilderness areas.

<b>Routing Factor Minn. Rules 7850.1900 subp. 3 and Minn. Rules 7850.4100</b>	<b>Impacts Resulting from Expanded Route Width and Proposed New ROW</b>
Parks and Natural Areas: No high voltage transmission line may be routed through state or national parks or state scientific and natural areas unless the transmission line would not materially damage or impair the purpose for which the area was designated, and no feasible and prudent alternative exists. Economic considerations alone do not justify use of these areas for a high voltage transmission line (Minn. Rules 7850.4300)	No change from the Application. The requested new ROW and expanded route width are not located within parks or natural areas.

**Table 5. Comparison of Resource Impacts of Proposed New ROW for Route Option 2 South**

<b>Routing Factor Minn. Rules 7850.1900 subp. 3 and Minn. Rules 7850.4100</b>	<b>Impacts Resulting from the Proposed Right-of-Way Change</b>
Effects on human settlement, including noise and aesthetics	No new residences were identified within the expanded route width. For Route Option 2 South, there are the same number of residences within 500 feet of the revised centerline as compared to the centerline proposed in the Application.
Effects on displacement, cultural values, recreation, and public service	No change from the Application.
Effects on public health and safety	No change from the Application.
Effects on transportation including roadways, railroads, and airports/airstrips	No change from the Application.
Effects on land-based economies, including agriculture, forestry, tourism, and mining	Because the requested new ROW would involve placing transmission facilities on this route within agricultural use areas, impacts to agricultural land use will occur. Fewer acres of cultivated land will be crossed by the revised ROW as compared to the ROW proposed in the Application. For the remaining categories, no change is expected in comparison to the Application ROW.
Effects on archaeological and historic resources	The expanded route width and new proposed centerline and ROW would not impact any new archaeological sites or historic properties as compared to the Application, necessitating no change in the impacts or recommendations filed in Application.

<b>Routing Factor Minn. Rules 7850.1900 subp. 3 and Minn. Rules 7850.4100</b>	<b>Impacts Resulting from the Proposed Right-of-Way Change</b>
Effects on the natural environment, including effects on air quality, water resources, and flora and fauna	One additional new freshwater emergent wetland is within the proposed new ROW compared to the application ROW. All other natural environment effects from the proposed new ROW are expected to be similar to those identified in the Application.
Effects on rare and unique natural resources	No change from the Application.
Application of design options that maximize energy efficiencies, mitigate adverse environmental effects, and could accommodate expansion of transmission or generating capacity	No change from the Application.
Use or paralleling of existing rights-of-way, survey lines, natural division lines, and agricultural field boundaries	The proposed new ROW will parallel the existing CapX2020 Hampton – North Rochester 345 kV transmission (Line 0964) and replaces the previous proposal to double-circuit with Line 0964. The proposed new ROW will be within 200 feet west of the existing Line 0964 ROW.
Use of existing large electric power generating plant sites	No change from the Application.
Use of existing transportation, pipeline, and electrical transmission systems or rights-of-way	The proposed new ROW will parallel the existing 345 kV Line 0964 Line. The proposed new ROW will be within 200 feet west of the existing Line 0964. Some portions of the proposed ROW will be new and outside of the existing ROW.
Electrical system reliability	No change from Application.
Cost of constructing, operation and maintenance based on design and route	Constructing the new 345 kV transmission line adjacent to the existing 345 kV line rather than double-circuiting with the existing line (as proposed in the Application) will be more costly. This is due to an increase in land rights costs and the need to construct new single-circuit poles (v. using existing double-circuit poles with exiting line).
Human and natural environmental effects that cannot be avoided	See above related to impacts to residences.  Approximately 45.4 acres of land would be converted to transmission line ROW.  Environmental effects are expected to be limited to some additional tree clearing, where applicable, for construction and operation of the Project.
Irreversible and irretrievable commitments of resources	No change from the Application.

Routing Factor Minn. Rules 7850.1900 subp. 3 and Minn. Rules 7850.4100	Impacts Resulting from the Proposed Right-of-Way Change
Measures that might be implemented to mitigate the potential human and environmental impacts identified above the estimated costs of the mitigative measures	No change from the Application. Same mitigation measures proposed in the Application will be employed.
Wilderness areas: no high voltage transmission line may be routed through state or national wilderness areas (Minn. Rules 7850.4300)	No change from the Application. The requested new ROW and expanded route width are not located within state or national wilderness area.
Parks and Natural Areas: No high voltage transmission line may be routed through state or national parks or state scientific and natural areas unless the transmission line would not materially damage or impair the purpose for which the area was designated, and no feasible and prudent alternative exists. Economic considerations alone do not justify use of these areas for a high voltage transmission line (Minn. Rules 7850.4300)	No change from the Application. The requested new ROW and expanded route width are not located within parks or natural areas.

## References

The Historical Marker Database (hdmb.org)

2025 *Historical Markers in Goodhue County, Minnesota*. Available at <https://www.hmdb.org/results.asp?Search=County&County=Goodhue%20County&State=Minnesota>. Accessed April 1, 2025.

Minnesota Department of Natural Resources.

2019 National Wetland Inventory for Minnesota.

National Park Service (NPS)

2025 *National Register of Historic Places*, Public Map. Available at <https://www.nps.gov/maps/full.html?mapId=7ad17cc9-b808-4ff8-a2f9-a99909164466>. Accessed April 1, 2025.

Pope W. R. and S. Fee

1998 *Minnesota Cemetery Locations* (2<sup>nd</sup> ed.) Minnesota Family Trees, St. Paul.

Terrell, Michelle, and Andrea Vermeer (Pizza)

2011 *An Investigation of Unrecorded Historical Cemeteries in Minnesota*, Two Pines Resource Group. Prepared for Minnesota Historical Society and the Oversight Board of the Statewide Historical and Archaeological Survey.

Available at [https://mn.gov/admin/assets/2011-An-Investigation-of-Unrecorded-Historical-Cemeteries-in-Minnesota\\_tcm36-187376.pdf](https://mn.gov/admin/assets/2011-An-Investigation-of-Unrecorded-Historical-Cemeteries-in-Minnesota_tcm36-187376.pdf).  
Accessed April 1, 2025

Xcel Energy

2024 APPLICATION FOR A CERTIFICATE OF NEED AND ROUTE  
PERMIT FOR THE MANKATO – MISSISSIPPI RIVER  
TRANSMISSION PROJECT, PUC Docket Nos. E002/CN-22-532  
E002/TL-23-157. Electronic document. Available at  
<https://apps.commerce.state.mn.us/eera/web/file-list/15584>. Accessed  
April 1, 2025.

IN THE MATTER OF THE APPLICATION FOR  
A ROUTE PERMIT FOR THE MANKATO TO  
MISSISSIPPI RIVER 345 kV TRANSMISSION  
PROJECT IN SOUTHEAST MINNESOTA

DOCKET NO: E002/TL-23-157  
OAH Docket No. 65-2500-40099

**CERTIFICATE OF SERVICE**

Gustav Gerhardson certifies that on the 5th day of May, 2025, on behalf of Northern States Power Company, doing business as Xcel Energy, he efiled a true and correct copy of **Request to Expand Route Width** 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
1	Katherine	Arnold	katherine.arnold@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		No	23-157Official CC Service List
2	Michael W.	Chase	mwchase_kenyon@yahoo.com	Citizens for Environmental Rights and Safety		6201 480th St. Kenyon MN, 55946 United States	Electronic Service		No	23-157Official CC Service List
3	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	23-157Official CC Service List
4	Brent	Dauk	brentdauk@aol.com			140 438th Ave Moose Lake MN, 56063 United States	Electronic Service		No	23-157Official CC Service List
5	Richard	Davis	richard.davis@state.mn.us		Department of Commerce	85 7th Place East Suite 500 Saint Paul MN, 55101 United States	Electronic Service		No	23-157Official CC Service List
6	Seth	DeMerritt	seth.demerritt@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	23-157Official CC Service List
7	Bret	Eknes	bret.eknes@state.mn.us		Public Utilities Commission	Suite 350 121 7th Place East St. Paul MN, 55101-2147 United States	Electronic Service		No	23-157Official CC Service List
8	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 CC Service List
9	Ellen	Heine	ellen.l.heine@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MP-8 Minneapolis MN, 55401 United States	Electronic Service		No	23-157Official CC Service List
10	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 CC Service List
11	Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S. Eighth Street Minneapolis MN, 55402	Electronic Service		No	23-157Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						United States				
12	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 CC Service List
13	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 CC Service List
14	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 CC Service List
15	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	23-157Official CC Service List
16	Cezar	Panait	cezar.panait@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	23-157Official CC Service List
17	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 CC Service List
18	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		No	23-157Official CC Service List
19	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	23-157Official CC Service List
20	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	23-157Official CC Service List
21	Jeffrey	Small	jsmall@misoenergy.org			MISO P.O. Box 4202 Carmel IN, 46082-4202 United States	Electronic Service		No	23-157Official CC Service List
22	Lauren	Steinhaeuser	lauren.steinhaeuser@xcelenergy.com	Northern States Power		414 Nicollet Mall, 401-08 Minneapolis	Electronic Service		No	23-157Official CC

# Norther States Power Company

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Company dba Xcel Energy		MN, 55401 United States				Service List
23	Emily	Suppes	emily.suppes@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	23-157Official CC Service List
24	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 CC Service List

## AFFIDAVIT OF MAILING

IN THE MATTER OF THE APPLICATION FOR A ROUTE PERMIT FOR THE MANKATO TO MISSISSIPPI RIVER 345 kV TRANSMISSION PROJECT IN SOUTHERN MINNESOTA

[illegible]

I, Ellen Heine, hereby certify that on May 8, 2025, I directed to be sent by U.S. Mail a true and correct copy of the attached mailing regarding the Xcel Energy's Request to Expand the Route Width for portions of the Mankato – Mississippi River 345 kV Transmission Line Project to all persons on the attached mailing list.

Ellen Heine

Ellen Heine



414 Nicollet Mall  
Minneapolis, MN 55401

May 8, 2025

<Address block>

**RE: Proposed Alignment Change for a Portion of the Mankato to Mississippi River  
Transmission Project  
PUC Docket Number: E002/TL-23-157**

Dear Landowner or Tenant,

We are writing to inform you about a proposed change in alignment for a portion of the Mankato to Mississippi River Transmission (MMRT) Project which may affect your property. This segment of the project was proposed to be installed on the poles that were constructed as part of the CapX2020 transmission line, which were designed to be capable of supporting a second 345 kV circuit. This alignment change would involve constructing the new MMRT 345 kV line parallel to that existing transmission line rather than being located on the same structures. It has been requested due to a recent transmission line project which has been approved by the Midcontinent Independent Transmission Operator, Inc.

The enclosed maps show the transmission line alignment that was included in the route permit application and the proposed revised alignment, which affects portions of the routes initially identified as Route Option 2 North and Route Option 2 South. This includes an overview map showing the full extent of the requested alignment change, and a map or maps showing where your property is in relation to the proposed alignment and right-of-way.

If you want more information about this requested change, a copy of our recent filing with the Minnesota Public Utilities Commission (PUC) is available on the Project website at <https://mmrtproject.com/library/>. Once on the page scroll down to the Permitting Documents section.

The PUC will be holding public hearings to gather public input about the Project from May 27 through May 29, 2025. You will be receiving a mailing from the PUC with details on the hearings, which will include a virtual hearing on May 29<sup>th</sup>. The notice will provide dates and times for each of the public hearings, information on how to access the virtual public hearing, and information about how to provide comments about the Project to the Commission.

The public hearing that will be held closest to you is on May 28<sup>th</sup> at the Zumbrota VFW Post 5727:



414 Nicollet Mall  
Minneapolis, MN 55401

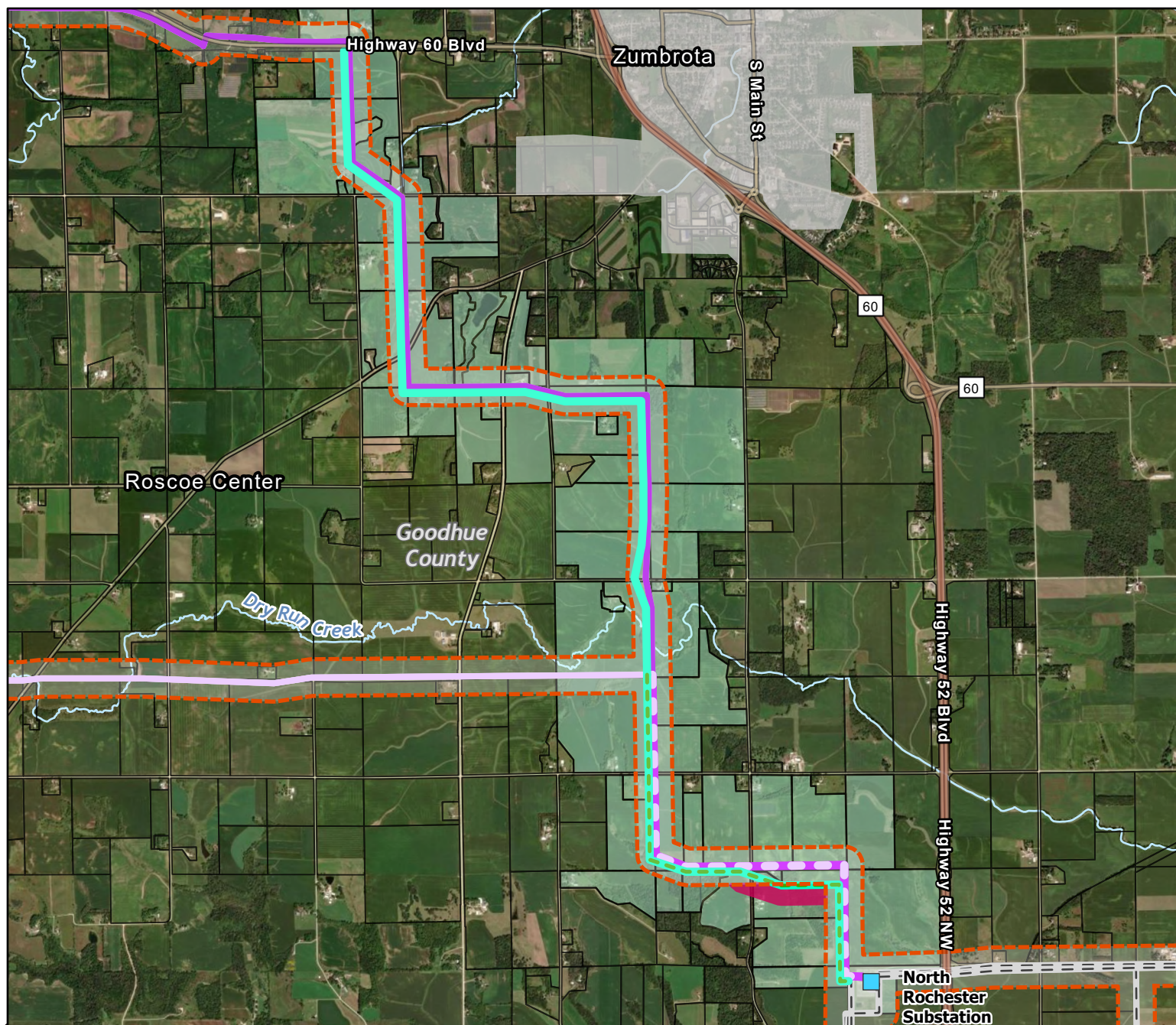
May 28, 2025	5 p.m. to 6 p.m. Open House 6 p.m. to 8:30 p.m. Public Hearing	Zumbrota VFW 25 E 1st St. Zumbrota, MN 55992
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You are welcome to contact the project team if you have any questions about this proposed change via email at: [contact@mmrtproject.com](mailto:contact@mmrtproject.com) or by phone at 1-800-853-3365.

Thank you,

A handwritten signature in blue ink that reads 'Ellen Heine'.

Ellen Heine  
Principal Siting and Permitting Agent  
Xcel Energy

**REQUESTED CHANGE TO ROUTE OPTIONS 2 NORTH AND 2 SOUTH****LEGEND**

Project Substation

**Proposed Route Option**

2 North

2 South

2 North/ 2 South

Other Proposed Route Options

Revision to Route Option 2 North

Revision to Route Option 2 North/South

Route Width Expansion Area

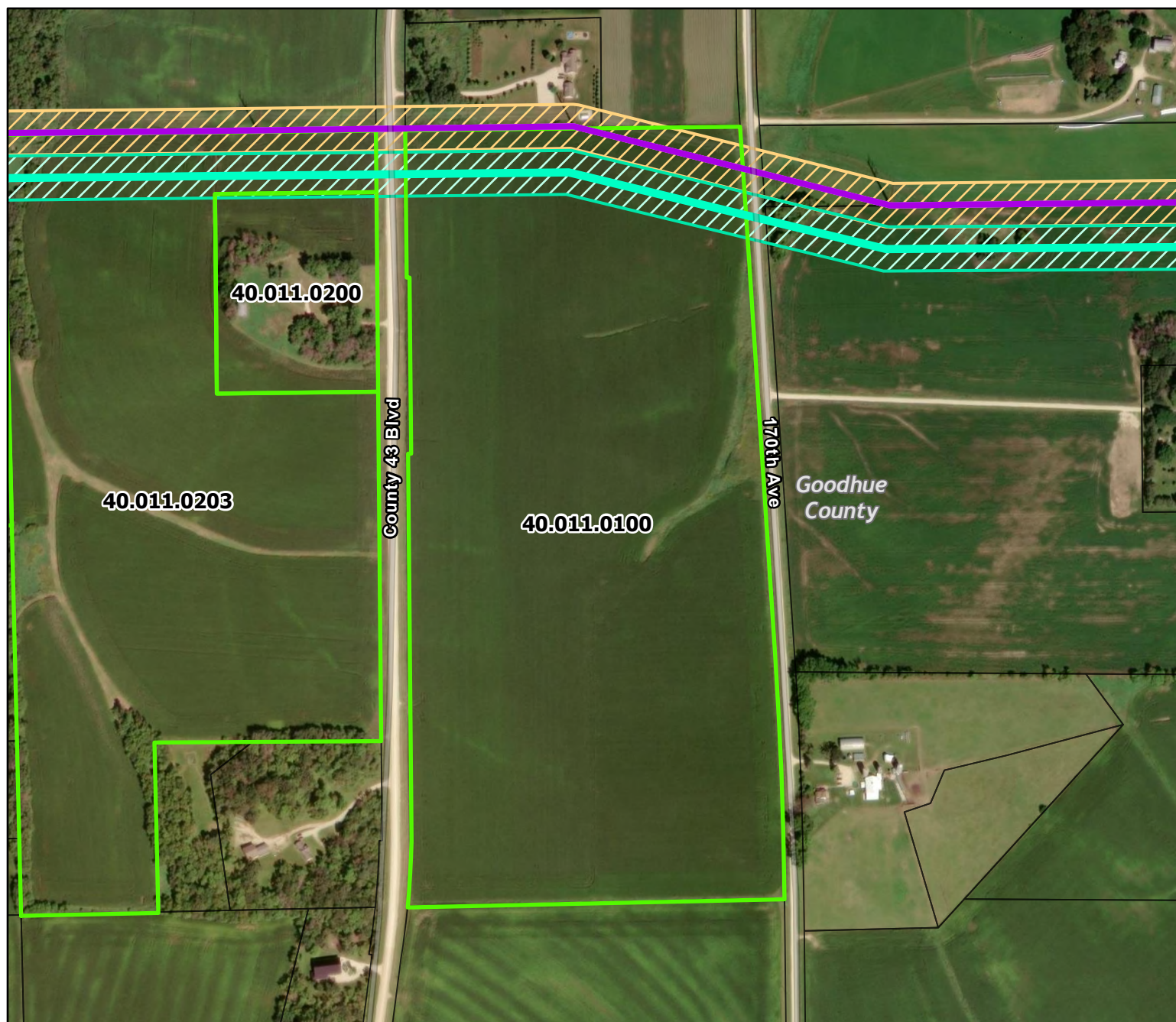
RPA Route Width

Parcel

Landowner Parcel



0 1 2 Miles

**PROPOSED ALIGNMENT CHANGE : Example 1****(Map 1 of 4)****LEGEND**

— 2 North

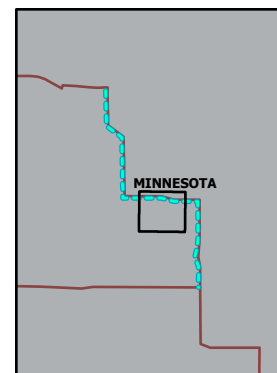
— Revision to Route  
Option 2 North

Parcel

Landowner Parcel

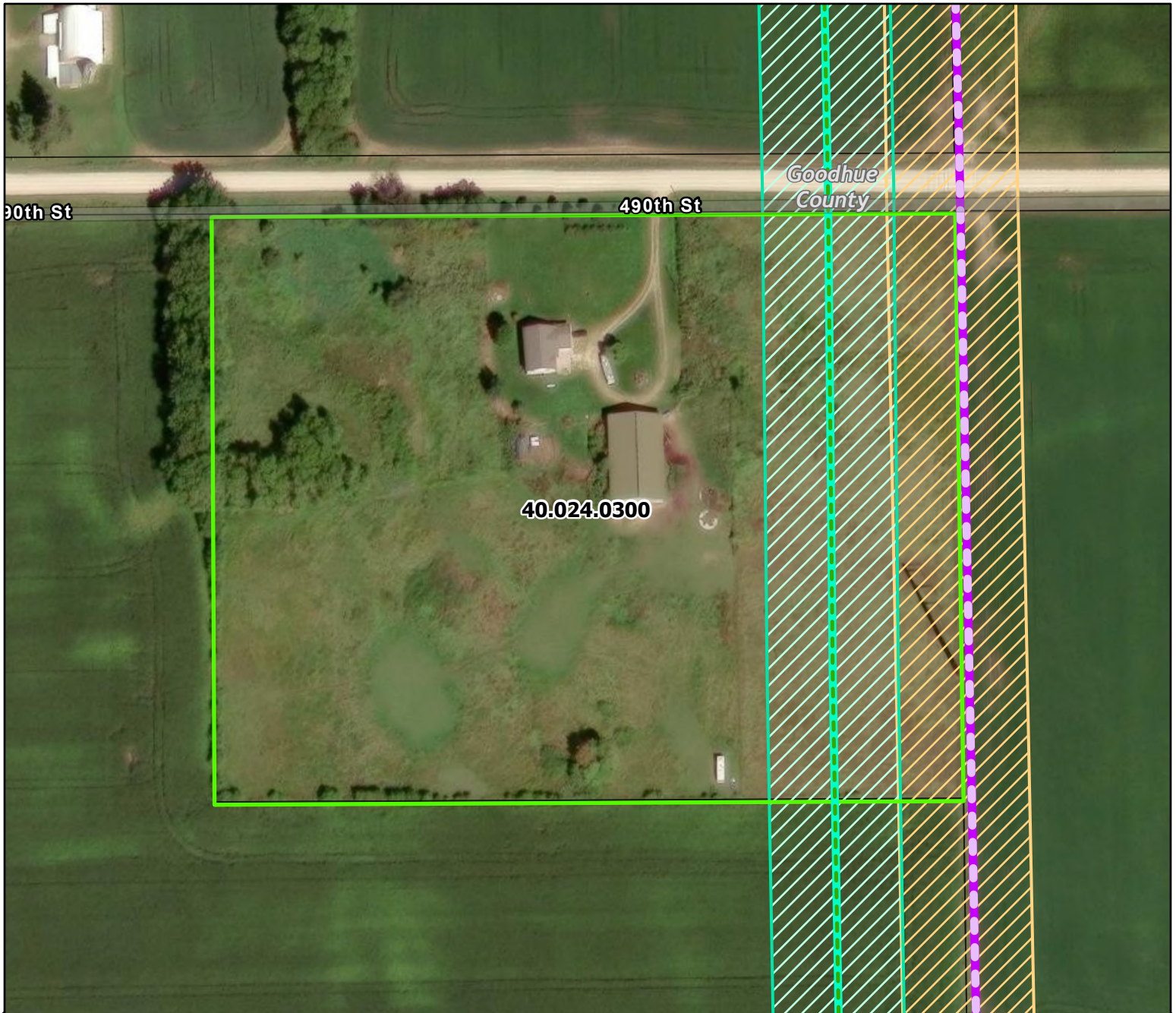
Initial Right-of-Way

Revised Right-of-Way



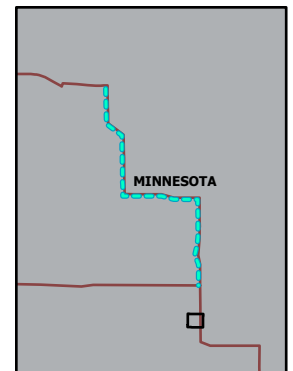
0 1 2 Miles

**PROPOSED ALIGNMENT CHANGE : Example 2 (Map 1 of 1)**



**LEGEND**

- |  |                  |                      |
|--|------------------|----------------------|
| 2 North/ 2 South                       | Parcel           | Initial Right-of-Way |
| Revision to Route Option 2 North/South | Landowner Parcel | Revised Right-of-Way |



0 1 2 Miles

## Northern States Power Company

Ellen Heine Rebuttal Testimony

Schedule 6 Affidavit of Mailing Notice to Affected Landowners

Page 7 of 7

Landowner First Name	Landowner Last Name	Secondary Landowner Name	Address	City	State	Zipcode
TAMMY L	AARSVOLD	EMILY AARSVOLD	17434 490TH ST	ZUMBROTA	MN	55992
BHFP INC			40890 HIGHWAY 57 BLVD	ZUMBROTA	MN	55992
KENT W	BILLMAN	CYNTHIA A BILLMAN	47174 170TH AVE	ZUMBROTA	MN	55992
DANIEL W	BURDICK	JEAN M BURDICK (TTEE)	21367 480TH ST	ZUMBROTA	MN	55992
MARK G	CHAMBERLAIN	SHARI L CHAMBERLAIN	18243 490TH ST	PINE ISLAND	MN	55963
SCOTT A	CORDES	JILL E CORDES	2914 HILLSVIEW E	ROSEVILLE	MN	55113
DANIEL	DWYER	STEPHANIE SMITH	46350 COUNTY 10 BLVD	ZUMBROTA	MN	55992
VIRGIL L JR	DYKES		37095 COUNTY 47 BLVD	GOODHUE	MN	55027
NANCY M	ELLISON		15775 HIGHWAY 60 BLVD	ZUMBROTA	MN	55992
JAMES G REV TRUST	ERREDGE	CLARICE A ERREDGE REV TRUST	6554 60TH ST SW	BYRON	MN	55920
ROBERT D	ERREDGE		15983 460TH ST	ZUMBROTA	MN	55992
RICKY L	FERGUSON	FAYE C FERGUSON	49566 170TH AVE	PINE ISLAND	MN	55963
BRUCE	FINNESGARD	SUSAN FINNESGARD	46370 160TH AVE	ZUMBROTA	MN	55992
JOEL L	FLEMKE	NANCY J FLEMKE	49058 180TH AVE	PINE ISLAND	MN	55963
ROBERT E	FLORES	ANGELA C FLORES	45777 162ND AVE	ZUMBROTA	MN	55992
MATTHEW O	FREEMAN		410 CHEROKEE AVE	WEST SAINT PAUL	MN	55107
CHARLES L	GOPLN	PATRICIA A GOPLN (TTEE)	17289 490TH ST	ZUMBROTA	MN	55992
GREGORY A	GOPLN		50555 BRANCH TRL	PINE ISLAND	MN	55963
ZACHARY A	GROVE	DANIELLE E GROVE	16115 HIGHWAY 60 BLVD	ZUMBROTA	MN	55992
KEITH A	KNUTSON		49273 170TH AVE	PINE ISLAND	MN	55963
KRISTINE L	KNUTSON		49273 170TH AVE	PINE ISLAND	MN	55963
ZACHARY A	KNUTSON		46998 170TH AVE	ZUMBROTA	MN	55992
MICHAEL R	KOOP	MARIE D KOOP	17250 480TH ST	ZUMBROTA	MN	55992
DIANE L	KRAUSE		PO BOX 356	PINE ISLAND	MN	55963
HARLEY D	KRAUSE		PO BOX 356	PINE ISLAND	MN	55963
ANDREW J	LEJCHER	SHERRIE L LEJCHER	49596 170TH AVE	PINE ISLAND	MN	55963
JOHN R	LEXVOLD		47281 180TH AVE	ZUMBROTA	MN	55992
KYLE S	LODERMEIER	TARA M L LODERMEIER	46938 COUNTY 43 BLVD	ZUMBROTA	MN	55992
TIMOTHY G	MACK	MARIE A MACK	46070 COUNTY 10 BLVD	ZUMBROTA	MN	55992
GERALDINE H	MCINTOSH		15678 460TH ST	ZUMBROTA	MN	55992
JAMES M	MCMAMARA	TONJA L MCMAMARA	50464 195TH AVE	PINE ISLAND	MN	55963
CHRISTOPHER R	MILLER		511 W GLENBROOK DR	LENOIR CITY	TN	37771
MATTHEW R	MILLER	SARAH M MILLER	50112 180TH AVE	PINE ISLAND	MN	55963
DAVID R	MORISSETTE	JEANNETTE M MORISSETTE (TTEE)	33293 XKIMO TRL NW	CAMBRIDGE	MN	55008
ANGELA	MORKEN	SHANNON HOWARD	15585 COUNTY 9 BLVD	GOODHUE	MN	55027
NORTHERN STATES	POWER COMPANY	Ellen Heine, SLR	414 NICOLLET MALL	MINNEAPOLIS	MN	55401
ERWIN A	PONCELET	THERESA K PONCELET	49508 180TH AVE	PINE ISLAND	MN	55963
DENNIS	REDFIELD	RAMONA REDFIELD	17564 480TH ST	ZUMBROTA	MN	55992
DONALD L	SCHLIEP	DEBRA L SCHLIEP	48383 HIGHWAY 52 BLVD	ZUMBROTA	MN	55992
LEROY S	SCHLIEP	DEBORA A SCHLIEP	405 E 9TH ST	ZUMBROTA	MN	55992
TODD R	SCHUMACHER	ANGELA J SCHUMACHER	16233 460TH ST	ZUMBROTA	MN	55992
GRADY	STEHNR	SARAH STEHR	19601 432ND STREET WAY	ZUMBROTA	MN	55992
SHEILA A	STENSLAND		3916 N POTSDAM AVE	SIOUX FALLS	SD	57104
ORDEAN E	SWAIN	ELLA MAE SWAIN	47427 180TH AVE	ZUMBROTA	MN	55992
TIEDE, DUANE D TRUST		CONNIE J TIEDE TRUST	6 S 521 SUSSEX	NAPERVILLE	IL	60540
ERIK	TORJESEN		44500 66TH AVENUE WAY	KENYON	MN	55946

IN THE MATTER OF THE APPLICATION FOR  
A ROUTE PERMIT FOR THE MANKATO TO  
MISSISSIPPI RIVER 345 kV TRANSMISSION  
PROJECT IN SOUTHEAST MINNESOTA

DOCKET NO: E002/TL-23-157  
OAH Docket No. 65-2500-40099

**CERTIFICATE OF SERVICE**

Gustav Gerhardson certifies that on the 12th day of May, 2025, on behalf of Northern States Power Company, doing business as Xcel Energy, he efiled a true and correct copy of the **Rebuttal Testimony and Schedules of Ellen Heine** 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. A paper copy was also mailed to Judge Ann C. O'Reilly.

/s/ Gustav Gerhardson  
Gustav Gerhardson

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Katherine	Arnold	katherine.arnold@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		No	23-157Official CC Service List
2	Michael W.	Chase	mwchase_kenyon@yahoo.com	Citizens for Environmental Rights and Safety		6201 480th St. Kenyon MN, 55946 United States	Electronic Service		No	23-157Official CC Service List
3	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	23-157Official CC Service List
4	Brent	Dauk	brentdauk@aol.com			140 438th Ave Moose Lake MN, 56063 United States	Electronic Service		No	23-157Official CC Service List
5	Richard	Davis	richard.davis@state.mn.us		Department of Commerce	85 7th Place East Suite 500 Saint Paul MN, 55101 United States	Electronic Service		No	23-157Official CC Service List
6	Seth	DeMerritt	seth.demerritt@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	23-157Official CC Service List
7	Bret	Eknes	bret.eknes@state.mn.us		Public Utilities Commission	Suite 350 121 7th Place East St. Paul MN, 55101-2147 United States	Electronic Service		No	23-157Official CC Service List
8	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 CC Service List
9	Ellen	Heine	ellen.l.heine@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MP-8 Minneapolis MN, 55401 United States	Electronic Service		No	23-157Official CC Service List
10	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 CC Service List
11	Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S. Eighth Street Minneapolis MN, 55402	Electronic Service		No	23-157Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						United States				
12	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 CC Service List
13	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 CC Service List
14	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 CC Service List
15	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	23-157Official CC Service List
16	Cezar	Panait	cezar.panait@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	23-157Official CC Service List
17	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 CC Service List
18	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		No	23-157Official CC Service List
19	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	23-157Official CC Service List
20	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	23-157Official CC Service List
21	Jeffrey	Small	jsmall@misoenergy.org			MISO P.O. Box 4202 Carmel IN, 46082-4202 United States	Electronic Service		No	23-157Official CC Service List
22	Lauren	Steinhaeuser	lauren.steinhaeuser@xcelenergy.com	Northern States Power		414 Nicollet Mall, 401-08 Minneapolis	Electronic Service		No	23-157Official CC

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Company dba Xcel Energy		MN, 55401 United States				Service List
23	Emily	Suppes	emily.suppes@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	23-157Official CC Service List
24	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 CC Service List