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April 6, 2026

—Via Electronic Filing—

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

The Honorable Kristien R.E. Butler
Court of Administrative Hearings
600 North Robert Street
P.O. Box 64620
Saint Paul, MN 55164-0620

RE: RESPONSE TO PUBLIC HEARING COMMENTS & FINDINGS OF FACT AND
CONCLUSIONS OF LAW
IN THE MATTER OF THE APPLICATION OF NORTHERN STATES POWER
COMPANY D/B/A XCEL ENERGY FOR A SITE PERMIT FOR THE UP TO 600 MW
SHERCO SOUTH & WEST BATTERY ENERGY STORAGE PROJECT IN SHERBURNE
COUNTY, MINNESOTA
DOCKET NO. E002/ESS-25-319
CAH DOCKET NO. 24-2500-41543

Dear Ms. Bergman and Judge Butler:

Northern States Power Company d/b/a Xcel Energy (“Xcel Energy”) respectfully submits this response to public comments submitted during the public hearing and comment period ending March 30, 2026 on the Application for a Site Permit (“Application”) for the up to 600 megawatt (“MW”) Sherco South & West Battery Energy Storage Project in Sherburne County, Minnesota (“Project”).

During the public hearing, Mr. Mark Kolbinger, Mayor of the City of Becker, provided oral comments. During the comment period, written comments were submitted by Minnesota Department of Natural Resources, the Minnesota Interagency Vegetation Management Planning Working Group, and the Energy Infrastructure Permitting Staff. Xcel Energy appreciates the opportunity to offer this response.

With these comments, Xcel Energy also provides Proposed Findings of Fact and Conclusions of Law for the convenience of the Commission in reviewing this docket.

These comments have been e-filed today through www.edockets.state.mn.us. A copy of this filing is also being served upon the persons on the Official Service Lists of record.

Please let me know if you have any questions regarding this filing.

Sincerely,

/s/ Jody Londo

JODY LONDO
DIRECTOR, REGULATORY AND STRATEGIC ANALYSIS

Enclosures

**STATE OF MINNESOTA
BEFORE THE
PUBLIC UTILITIES COMMISSION**

KATIE SIEBEN
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AUDREY PARTRIDGE
HWIKWON HAM
JOHN TUMA

CHAIR
VICE-CHAIR
COMMISSIONER
COMMISSIONER
COMMISSIONER

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**XCEL ENERGY'S
RESPONSE TO PUBLIC COMMENTS**

I. Introduction

Northern States Power Company, doing business as Xcel Energy (Xcel Energy) respectfully submits these comments responding to the written and oral public hearings comments submitted at the public hearing and through the March 30, 2026 comment deadline. It also responds to Energy Infrastructure Permitting (EIP) staff recommendations to the draft decommissioning plan. Specifically, Xcel Energy responds to the comments submitted by Mr. Mark Kolbinger, Mayor of the City of Becker, the Minnesota Department of Natural Resources (DNR)¹, the Minnesota

¹ DNR Comments (March 30, 2026) (eDocket No. 20263-229782-01).

Interagency Vegetation Management Planning Working Group (VMPWG)², and the Energy Infrastructure Permitting (EIP) staff³, below.

II. Response to Public Comments

A. City of Becker

One member of the public provided oral comments at the public hearings. At the in-person public hearing on March 18, 2026, Mr. Mark Kolbinger, the City of Becker Mayor, spoke to provide support for issuing a site permit and to ask for coordination with the City of Becker and Becker Township Joint Fire Board.⁴ The Mayor requested that Xcel Energy engage in early coordination with the Joint Fire Board regarding the Company's activities in the area. Xcel Energy agreed to work with the Joint Fire Board to provide such early coordination. Xcel Energy appreciates the Mayor's comments and support of the Project.

B. Minnesota DNR's Comments

The Minnesota DNR submitted comments dated March 30, 2026 on the DSP for the Project.⁵ The DNR supports a special condition requiring the Applicant to complete coordination with the DNR regarding rare species—including following stated avoidance measures and the Takings Permit process if needed—before Project

² VMPWG Comments (March 30, 2026) (eDocket No. 20263-229772-01).

³ EIP Staff Comments (April 2, 2026) (eDocket No. 20264-229946-01).

⁴ Becker Public Hearing on 3-18-26 Transcript (April 3, 2026) (eDocket No. 20264-229991-01).

⁵ *See generally*, DNR Comments.

activities begin, and proposes permit language consistent with the Benton Solar Project (Docket No. IP-7155/ESS-24-283) requiring compliance with Minnesota's Endangered Species Statute (Minn. Stat. § 84.0895) and associated rules.⁶ Additionally, the DNR supports special permit condition 5.9 requiring coordination with the DNR on the final fencing plan.⁷ Xcel Energy does not object to either of these additional special conditions and will coordinate with the DNR as required.

The DNR recommends that the Vegetation Management Plan (VMP) provide greater detail on reestablishment phases and specify plant species to be used, including an approximate percentage each seed type accounts for in the total seed mix, urging a diverse mix of native grasses and forbs suited to site conditions to minimize erosion and stormwater runoff and create habitat in the surrounding Project boundary; it supports DSP special condition 5.1 as written and offers continued coordination on VMP practices and seed mixes.⁸ Xcel Energy will continue to work with the VMPWG to finalize the VMP prior to the start of construction.

The DNR respectfully disagrees with the Applicant's opposition to seasonal tree clearing restrictions from June 1 to August 15, noting that all of Minnesota's bat species can be found throughout the state even absent local records and that the restriction also

⁶ DNR Comments at 2-3.

⁷ DNR Comments at 3; EIP Staff Recommendations on DSP and Need for EA Addendum at 15 (February 4, 2026) (eDocket No. 20262-227828-01).

⁸ DNR Comments at 2.

protects nesting birds given the Project's proximity to the Mississippi River migration corridor. Accordingly, the DNR supports special condition 5.4 as written in the DSP.⁹

As stated in the Direct Testimony of Mr. Jordan Clitty, submitted on March 11, 2026¹⁰ Xcel Energy continues to disagree that the record supports such a broad prohibition: there are no known Northern Long-Eared Bat (NLEB) maternity roost trees or hibernacula in Sherburne County, and the Project site contains only limited amounts of suitable forested habitat, consisting primarily of sparse conifers.¹¹ A rigid seasonal prohibition would unnecessarily constrain Xcel Energy's construction schedule without a corresponding environmental benefit proportionate to the restriction. Prohibiting tree clearing at this site until after August 15 will likely delay the Q3 start of construction for this Project. Xcel Energy recommends the following language replace Special Condition 5.4:

The Permittee will coordinate with the U.S. Fish and Wildlife Service regarding the timing of tree-clearing and any other construction or restoration actions that may impact the Northern Long Eared Bat. The Permittee shall keep records of compliance with this section and provide them upon the request of Commission staff.

The DNR supports special condition 5.7 regarding the tree replacement plan and encourages the Commission to further define the condition by establishing a de minimis

⁹ DNR Comments at 1.

¹⁰ Xcel Energy Direct Testimony – Clitty (March 11, 2026) (eDocket No. 20263-229153-01).

¹¹ Application at 123 (December 5, 2025) (eDocket No. 202512-225568-02).

threshold of tree removal and a definition of a tree.¹² The DNR advises that the tree replacement plan prioritize replacing lost habitat beyond visual screening plantings, specifically noting that bur oaks present on the Project site provide valuable habitat and should be replaced if removed, while eastern red cedar should not be replaced due to its tendency to aggressively reseed and inhibit other native species.¹³ Xcel Energy appreciates the DNR's input and will coordinate with the DNR and the Commission as the tree replacement plan is further developed.

C. VMPWG's Comments

VMPWG advised that no Commission action is recommended at this time and offered comments to support a VMP that will satisfy pre-construction compliance requirements for the Sherco South and West Battery Energy Storage Project.¹⁴ For example, VMPWG recommended modifications to the draft VMP to include short- and long-term management objectives, comprehensive descriptions of restoration and management activities (including site preparation, timing, seeding methods, and seed mixes), monitoring and evaluation protocols, identified management tools and their timing, responsible third-party contractors, noxious weed and invasive species controls, and a marked-up site plan aligning revegetation areas with corresponding seed mixes.¹⁵

¹² DNR Comments at 2.

¹³ DNR Comments at 2.

¹⁴ VMPWG Comments at 1.

¹⁵ VMPWG Comments at 1-2.

The VMPWG requests continued coordination with EIP staff and state agencies as the plan is finalized and emphasizes establishing goals, selecting appropriate seed mixes, and refining installation, management, and monitoring to meet permit conditions.

Xcel Energy will continue to work with the VMPWG to finalize the VMP to align with the Commission's DSP framework and agency guidance prior to the start of construction.

D. EIP Staff's Comments

EIP staff's comments provide detailed feedback on the draft Decommissioning Plan and provide recommended modifications.¹⁶ EIP staff's recommendations on the Decommissioning Plan are similar to comments it has suggested for other recent Decommissioning Plans. It emphasizes that the Decommissioning Plan should serve as a stand-alone document describing the facility as it exists on the ground and how Xcel Energy will fulfill its obligation to remove project components at the end of the facility's life. Xcel Energy appreciates the thoroughness and constructiveness of EIP Staff's comments on the draft Decommissioning Plan. Xcel Energy will continue to coordinate with EIP to incorporate the recommendations and revise the Decommissioning Plan prior to the start of construction.

¹⁶ See generally, EIP Staff Comments (April 2, 2026) (eDocket No. 20264-229946-01).

III. Conclusion

Xcel Energy appreciates the opportunity to provide these reply comments and respectfully submits that the record supports the issuance of a Site Permit for the Project, with the modified conditions discussed in Xcel Energy's previously filed Direct Testimony on March 11, 2026 and these reply comments.

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**NORTHERN STATES POWER
COMPANY'S PROPOSED
FINDINGS OF FACT AND
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COMPANY'S PROPOSED
FINDINGS OF FACT AND
CONCLUSIONS OF LAW**

Northern States Power Company D/B/A Xcel Energy (Xcel Energy or Applicant) has applied for a Site Permit (Application) to construct and operate an up to 600 megawatt (MW) Battery Energy Storage System (ESS) located in the City of Becker (or City) in Sherburne County, Minnesota (Project).

Public hearings on the Application were held on March 18, 2026 (in-person) and March 19, 2026 (remote-access). The factual record remained open until April 6, 2026, for the receipt of written comments.

STATEMENT OF ISSUES

Has Xcel Energy satisfied the criteria established in Minn. Stat. Ch. 216I (2025) for a site permit for the Project?

SUMMARY

Xcel Energy has satisfied the applicable legal requirements and, accordingly, the Minnesota Public Utilities Commission (Commission) GRANTs a site permit for the Project, subject to the conditions discussed below.

Based on the evidence in the hearing record, the Commission makes the following:

FINDINGS OF FACT

I. APPLICANT

1. Xcel Energy is a public utility that provides electricity and energy services in parts of Minnesota, Wisconsin, South Dakota, North Dakota, and the upper peninsula of Michigan.¹

II. PROCEDURAL HISTORY

2. On December 5, 2025, Xcel Energy submitted the Application for the Project.²

3. On December 19, 2025, the Commission determined the application to be sufficiently complete to begin the permitting review process. It published a Notice of Site Permit Application Completeness Determination and Public Information Meetings, scheduling the meetings for January 13, 2026 (remote-access) and January 14, 2026 (in-person), opening a public comment period until January 26, 2026, and requesting responses to two questions regarding the Project: (1) Are there potential human and environmental impacts or unique characteristics of the proposed project that are not addressed in the Environmental Assessment (EA) prepared by the Applicant?; (2) Are there any methods to mitigate potential impacts of the proposed Project that require further evaluation?³

4. The Commission provided notice of the Project in the Environmental Quality Board (EQB) Monitor on December 23, 2025, and in the Patriot News MN newspaper on December 27, 2025.⁴

5. On January 12, 2026, the Commission filed a sample ESS permit.⁵

6. On January 13-14, 2026, the Commission and the Commission's Energy Infrastructure Permitting (EIP) Staff conducted Public Information and EA Scoping meetings.⁶ Three members of the public provided oral comments at these meetings. One individual asked where the battery energy storage components were made; one local government representative stated that they were coordinating with the Applicant regarding the Project; and one representative of the International Union of Operating

¹ Ex. App.-1 at 5 (Application).

² Ex. App.-1 at 5 (Application).

³ Ex. PUC-1 (Notice of Site Permit Application Completeness Determination and Public Information Meetings).

⁴ Ex. PUC-3 (EQB Monitor); App.-2 (Affidavit of Publication).

⁵ Ex. PUC-4 (Sample ESS Permit).

⁶ Ex. PUC-6 (Oral Comments from Public Information and Scoping Meetings).

Engineers (IUOE) Local 49 spoke about local labor and ensuring that the EA for the project addressed local job creation.

7. On January 26, 2026, the Minnesota Department of Natural Resources (DNR) filed a Natural Heritage Review Letter.⁷ DNR also filed scoping comments.⁸

8. On January 28, 2026, the Commission filed the written⁹ and oral¹⁰ public comments from the Public Information and Scoping Meetings.

9. On February 4, 2026, EIP Staff filed recommendations on the Project's scope, recommending the Commission (1) find that an EA addendum is not required for the Project, (2) issue the Draft Site Permit (DSP) prepared by EIP Staff, and (3) request that an Administrative Law Judge conduct public hearings for the Project and prepare a summary of public testimony as expeditiously as possible.¹¹

10. On February 19, 2026, the Court of Administrative Hearings (CAH) filed an Order requiring public hearings, with an in-person public hearing scheduled for March 18, 2026, and a virtual public hearing scheduled for March 19, 2026.¹² A prehearing conference was also held on February 19, 2026.¹³

11. On February 25, 2026, the Commission filed an Order: (1) finding an EA addendum is not required, (2) issuing the DSP prepared by EIP, including special permit conditions, and (3) requesting an Administrative Law Judge from CAH conduct public hearings.¹⁴

12. On February 27, 2026, the Commission submitted the Notice of Public Hearings and Availability of Draft Permit.¹⁵

13. The Commission published notice of the Project in the Patriot News MN newspaper on March 7, 2026, and the EQB Monitor on March 10, 2026.¹⁶

⁷ DNR Natural Heritage Review Letter (January 26, 2026) (eDocket No. [20261-227413-02](#)).

⁸ DNR Scoping Comments (January 26, 2026) (eDocket No. [20261-227413-01](#)).

⁹ Ex. PUC-7 (Written Public Comments Received).

¹⁰ Ex. PUC-6 (Oral Comments from Public Information and Scoping Meetings).

¹¹ Ex. EIP-1 (EIP Staff Recommendations on Draft Site Permit and Need for EA Addendum).

¹² CAH Order (February 19, 2026) (eDocket No. [20262-228382-01](#)).

¹³ Prehearing Transcript (February 19, 2026) (eDocket No. 20262-228602-01).

¹⁴ Ex. PUC-9 (Order).

¹⁵ Ex. PUC-11 (Notice of Public Hearings and Availability of Draft Permit).

¹⁶ Ex. PUC-12 (EQB Monitor Notice of Public Hearings and Availability of Draft Permit); Affidavit of Publication (March 31, 2026) (eDocket No. [20263-229837-01](#)).

14. On March 11, 2026, Xcel Energy filed the Direct Testimony of Jordan Clitty.¹⁷

15. On March 18 (in-person) and March 19, 2026 (virtual), Administrative Law Judge Kirstien R.E. Butler presided over public hearings in this matter. One member of the public attended and provided oral comments at the in-person public hearing at the Becker Community Center. No members of the public provided public comments at the virtual public hearing.

16. On April__, 2026, Administrative Law Judge Butler provided a summary of public comments. His summary is hereby incorporated into these findings.

17. On April 7, 2026, the Applicant filed a response to public comments and proposed findings of fact and conclusions of law.

III. DESCRIPTION OF THE PROJECT

18. The Project consists of an up to 600 MW alternating current battery ESS with approximately 2,400 megawatt hours (MWh) of energy capacity on a site consisting of approximately 62 acres adjacent to the Sherburne County Generating Station in the city of Becker, Sherburn county, Minnesota.

19. The proposed Project will interconnect via a less than 600 foot single-span kilovolt (kV) generation interconnect (gen-tie) line from the Project substation to the adjacent existing Sherburne County Substation.

IV. SITE LOCATION AND CHARACTERISTICS

20. The Project is situated in the south-central portion of the City of Becker, Minnesota, immediately northeast of the Mississippi River and south of the Sherburne County Generating Station. The Project is in sections 1, 2, 11, and 12 of Township 33N, Range 29W.¹⁸

21. The Project has been sited on land under complete ownership of Xcel Energy. No land leases, easements, or other land use agreements are necessary to accommodate Project development.¹⁹

22. Land use in the Project Area is predominately industrial business parks and the City of Becker, with residential areas located north of Highway 10. Commercial

¹⁷ Ex. App.-3 (Direct Testimony of Jordan Clitty and Schedule 1).

¹⁸ Ex. App.-1 at 9 (Application).

¹⁹ Ex. App.-1 at 9, 41 (Application).

development is present along major roadways to the east, while residential areas are located farther south and southeast of the Project site, generally separated by wooded areas, topographic variation, and local road networks.

23. The Project is a permitted use in the City of Becker's Wild and Scenic River Overlay District. Accordingly, the Project complies with the prohibited and exclusion site requirements outlined in Minn. R. 7850.4400.²⁰

V. PROJECT SCHEDULE

24. Xcel Energy plans to begin construction in the third quarter of 2026, with a commercial operation date currently anticipated by the fourth quarter of 2027.²¹

VI. SUMMARY OF PUBLIC COMMENTS

25. The Public Information and EA Scoping meetings were held on January 13 and 14, 2026. Three members of the public provided oral comments during the Public Information and EA Scoping Meetings. One individual asked where the battery energy storage components were made; one local government representative stated that they were coordinating with the Applicant regarding the Project; and one representative of the IUOE Local 49 spoke about local labor and ensuring that the EA for the Project addressed local job creation.²²

26. During the scoping comment period, DNR filed written comments recommending the Commission include an additional analysis of potential wildlife impacts and suggested three special permit conditions.²³ DNR recommended that Xcel Energy (1) coordinate with the DNR on the security fencing plan to address wildlife movement impacts, (2) incorporate a detailed Vegetation Management Plan (VMP) with native species and reestablishment phases, and (3) avoid tree removal from June 1 to August 15 to protect nesting birds and roosting bats.²⁴

27. Xcel Energy filed its written direct testimony of Jordan Clitty on March 11, 2026, which included its response to DNR's comments.²⁵

28. At the in-person public hearing on March 18, 2026, Mr. Mark Kolbinger, the City of Becker Mayor, spoke to provide support for issuing a site permit and to

²⁰ Ex. App.-1 at 132 (Application).

²¹ Ex. App.-1 at 2 (Application).

²² Ex. PUC-6 (Oral Comments from Public Information and Scoping Meetings).

²³ DNR Scoping Comments (January 26, 2026) (eDocket [20261-227413-01](#)).

²⁴ DNR Scoping Comments (January 26, 2026) (eDocket [20261-227413-01](#)).

²⁵ Ex. App.-3 (Direct Testimony of Jordan Clitty and Schedule 1).

ask for coordination with the City of Becker and Becker Township Joint Fire Board.²⁶ At the virtual hearing on March 19, 2026, no members of the public provided comment.

29. DNR, in its March 30, 2026 public comments on the DSP, focused on several overarching environmental protection and habitat preservation themes. DNR continued to advocate for a seasonal tree-clearing restriction from June 1–August 15, over Xcel Energy’s opposition, maintaining that the restrictions are warranted to protect bat species and nesting birds, particularly given the Project’s proximity to the Mississippi River migration corridor. It also advocated for more robust and ecologically meaningful tree replacement and vegetation management standards, urging that replacement efforts prioritize habitat restoration over mere visual screening and that the VMP include detailed, native-species-focused revegetation commitments. Additionally, the DNR called for a dedicated permit condition requiring compliance with Minnesota’s endangered and threatened species statutes and rules—modeled on the condition used in the Benton Solar Project—before any project activities commence.²⁷

30. Minnesota Interagency Vegetation Management Planning Working Group (VMPWG) filed written comments recommending the Commission not act at this time; instead, outlining revisions so the VMP meets pre-construction compliance and anticipated permit conditions, and requesting continued coordination with EIP, agencies, and VMPWG through pre-construction review. The plan should clearly cover objectives, activities, responsible parties, tools, monitoring, invasive control, and marked-up site plans with seed mixes.²⁸

31. On April 2, 2026, EIP Staff submitted comments on the draft Decommissioning Plan that center on the overarching theme that the plan, as filed, requires substantial revision to function as a comprehensive, standalone document that clearly describes the facility and the permittee’s obligations for end-of-life removal and site restoration. It identified several areas where the draft plan does not meet expectations—including the decommissioning objective, scheduled update provisions, project description, and required permits and notifications—and urged Xcel Energy to align the plan with the Commission’s Draft Decommissioning Plan Guidance and the terms of the DSP.²⁹

32. On April 6, 2026, Xcel Energy submitted its response to public hearing comments submitted at the public hearing and through the March 30, 2026 comment

²⁶ Becker Public Hearing on 3-18-26 Transcript (April 3, 2026) (eDocket No. 20264-229991-01).

²⁷ DNR Comments (March 30, 2026) (eDocket No. [20263-229782-01](#)).

²⁸ VMPWG Comments (March 30, 2026) (eDocket No. [20263-229772-01](#)).

²⁹ EIP Staff Comments (April 2, 2026) (eDocket No. [20264-229946-01](#)).

deadline submitted by DNR and VMPWG, and also its response to the draft Decommissioning Plan comments submitted by EIP Staff on April 2, 2026. Xcel Energy remains committed to working cooperatively with EIP as it prepares and submits its pre-construction filings, including updated to the Decommissioning Plan, and will continue to address the specific issues raised to support regulatory compliance. Furthermore, Xcel Energy will continue to work with DNR and VMPWG to incorporate the recommendations and finalize the VMP prior to the start of construction.

VII. PERMITTEE

33. The permittee for the Project is Xcel Energy.³⁰

VIII. PUBLIC AND LOCAL GOVERNMENT PARTICIPATION

34. Minn. Stat. § 216I.05 requires applicants to provide notice to each local unit of government within the Site, Minnesota Tribal governments, and state technical resource agencies.

35. In July 2025, Xcel Energy sent initial notification letters to federal, state, and local agencies regarding the Project. These letters stated that Xcel Energy intended to file a site permit application for the Project.³¹

36. Also, in July 2025, Xcel Energy sent notification letters to Tribal governments. These letters stated that Xcel Energy intended to file a site permit application for the Project. Xcel Energy followed up with a phone call to Tribes who had not responded to the notice letter on November 7, 2025, leaving voicemails where applicable.³²

IX. CERTIFICATE OF NEED

37. The Project does not require a certificate of need. Under Minn. Stat. § 216B.243, subd. 8(9), a certificate of need is not required for ESS.³³

X. SITE PERMIT CRITERIA

38. ESS are governed by Minn. Stat. Ch. 216I (2025) and Minn. R. Ch. 7850. Minn. Stat. § 216I.02, subd. 6 (2025), defines an ESS as “equipment and associated facilities designed with a nameplate capacity of 10,000 kilowatts or more that is capable

³⁰ Ex. App.-1 at 5 (Application).

³¹ Ex. App.-1 (Appx. C); Ex. App.-1 at 132 (Application).

³² Ex. App.-1 (Appx. C); Ex. App.-1 at 132-133 (Application).

³³ Ex. App.-1 at 38 (Application).

of storing generated electricity for a period of time and delivering the electricity for use after storage.”

39. A site permit is required prior to construction of the Project.³⁴

40. Under Minn. Stat. § 216I.05, subd. 4 (2025) and the Application Guidance for Large Energy Infrastructure Facilities in Minnesota – Standard Review (MPUC 2025), ESS are eligible for the Standard Review process under Minn. Stat. § 216I.07, subd. 2 and, therefore, the Application must contain an EA with information on the proposed Project’s human and environmental impacts and potential mitigation measures associated with the identified impacts.³⁵ The EA is the only state environmental review document required to be prepared on the Project.³⁶

41. The Commission is responsible for evaluating the Application and administering the permitting process.³⁷

XI. APPLICATION OF SITING CRITERIA TO THE PROPOSED PROJECT

A. Human Settlement

42. Minnesota law requires consideration of the Project’s effects on human settlement, including but not limited to displacement of residences and businesses, noise created by construction and operation of the Project, and impacts to aesthetics, cultural values, recreation, and public services.³⁸

1. Visual and Aesthetic Resources

43. The visible elements of the ESS will consist of battery energy storage units, transformers and inverters, a Project substation, a short transmission line, and security fencing surrounding the Project.³⁹

44. The Project is naturally screened by trees and bodies of water. There are existing rows of trees, shrubs, and woody vegetation in conjunction with varying elevations that provide screening from the Mississippi River or adjacent residences surrounding the Project. Fleeting or partial views may be possible from certain vantage

³⁴ Minn. Stat. § 216I.07, subd. 2(7); Ex. App.-1 at 36 (Application).

³⁵ Minn. Stat. § 216I.07, subd. 3(b).

³⁶ Ex. App.-1 at 43, Appendix B (Application).

³⁷ Minn. Stat. § 216I.05.

³⁸ Minn. Stat. § 216I.05, subd. 4(a)(2).

³⁹ Ex. App.-1 at 11 (Application).

points, particularly within the Sherburne County regions of influence (ROI), along U.S. Highway 10 or higher terrain east of the site.⁴⁰

45. Exterior security lighting will be installed at the Project substation and within the ESS pad areas for safety and security.⁴¹

46. Lighting will be downward facing and will minimize blue hues to minimize impacts from facility lighting.⁴²

47. Given the Project's siting within an established industrial setting and its proximity to an existing electrical generating station of similar scale and character, the Project would blend with the prevailing visual context and avoid introducing new or incompatible features. As a result, changes to viewsheds and overall visual character are anticipated to be minor, and the aesthetic impact intensity would be minimal. The Project will convert approximately 35 acres from its current landcover into an ESS facility. Although the change will be noticeable, the facility is similar in appearance to the existing electric infrastructure and other industrial and commercial features in the Project Area.⁴³

48. Aesthetic impacts from the Project are anticipated to be minor. The tie structures will be the most visible element of the facility as they are the tallest component of the Project, and the ESS enclosures would be relatively difficult to see due to their relatively low height, the site's topography and distance from roads and residential areas. For individuals with certain vantage points, particularly within the Sherburne County ROI, along U.S. Highway 10, or at a higher terrain east of the site, the view would be fleeting.⁴⁴

49. DSP Special Condition 5.9 would require Xcel Energy to design security fencing to minimize visual impact while maintaining compliance with the National Electric Safety Code. A final fence plan must be developed in coordination with the DNR and submitted to the Commission as part of the Site Plan.⁴⁵

50. The record demonstrates that Xcel Energy has taken steps to avoid and minimize visual impacts.⁴⁶

⁴⁰ Ex. App.-1 at 56 (Application).

⁴¹ Ex. App.-1 at 57 (Application).

⁴² Ex. App.-1 at 57 (Application).

⁴³ Ex. App.-1 at 9, 56-57 (Application).

⁴⁴ Ex. App.-1 at 56-57 (Application).

⁴⁵ See Ex. PUC EIP-1 at 15 (EIP Staff Recommendations on Draft Site Permit and Need for Environmental Assessment Addendum).

⁴⁶ Ex. App.-1 at 57 (Application).

2. *Displacement*

51. Displacement occurs when residences or other buildings are located within a proposed project site or rights-of-way and would potentially interfere with the safe operation of the project, requiring their removal and relocation. Displacements from large energy facilities are rare and are more likely to occur in heavily populated areas where avoiding all residences and businesses is not always feasible.⁴⁷

52. The Project is located in an industrial area on Xcel Energy-owned land, and the Project site contains only an existing greenhouse and storage shed. Other nearby structures are limited to the immediately adjacent Sherburne County Substation, the Sherburne County Generating Station approximately 1,100 feet to the north, and a warehouse approximately 5,000 feet to the north.⁴⁸

53. The nearest residence is located across the Mississippi River, approximately 940 feet south of the Project site boundary, on parcels under Xcel Energy ownership. The landowner has an active lease with Xcel Energy, and there are no plans to modify the existing lease as a result of the proposed Project.⁴⁹

54. Because the Project is sited on Xcel Energy-owned land in an industrial area with no residences or occupied buildings within the Project site or rights-of-way, no displacement of residences or businesses will be required. The surrounding land uses and distances to the nearest structures confirm that the Project can be constructed and operated without necessitating the removal or relocation of any buildings.⁵⁰

3. *Noise*

55. The Minnesota Pollution Control Agency (MPCA) has established standards for the regulation of noise levels. The most restrictive MPCA noise limits are 60–65 A-weighted decibels (dBA) during the daytime and 50–55 dBA during the nighttime.⁵¹

56. In Minnesota, noise standards are based on noise area classifications (NAC) corresponding to the location of the listener, referred to as a receptor. NACs are assigned to areas based on the type of land use activity occurring at that location. Household units, designated camping and picnicking areas, resorts and group camps are assigned to NAC 1; recreational activities (except designated camping and

⁴⁷ Ex. App.-1 at 57-58 (Application).

⁴⁸ Ex. App.-1 at 58 (Application).

⁴⁹ Ex. App.-1 at 58 (Application).

⁵⁰ Ex. App.-1 at 58 (Application).

⁵¹ Ex. App.-1 at 74 (Application).

picnicking areas) and parks are assigned to NAC 2; agricultural and related activities are assigned to NAC 3.⁵²

57. The Project is in an industrial area.⁵³ The primary noise receptors are the local residences.⁵⁴ Although there are no residences within the site, there are residences in local proximity (within 940 feet of the Project site or 1,285 feet of the permanent Project electrical infrastructure).⁵⁵ The local residential homes fall under NAC 1.⁵⁶ Noise receptors could also include individuals working outside of the Project vicinity. Potential noise impacts from the Project are associated with ambient noise of the existing Sherburne County Generating Station, Sherburne County Substation, sand mining, agriculture, traffic on U.S. Interstate 94, U.S. Highway 10, and local roads, railroads, industrial equipment/operations, wind, vehicle traffic, birdsong, and residences.⁵⁷

58. Intermittent noise impacts during construction are anticipated. Noise from construction will be temporary and limited to daytime hours.⁵⁸

59. Noise levels during operation of the Project are anticipated to be negligible.⁵⁹ The primary noise sources from the ESS facility will be the power transformer in the substation, inverters, and the cooling system in the cabinets.⁶⁰ In its noise analysis, Xcel Energy modeled two Sungrow Power Titan configurations: a base design using standard liquid-cooled ESS units with a sound power level of 102 dBA, and a mitigated design using air-cooled ESS units equipped with heat exchangers with a sound power level of 78 dBA. Modeling indicated that the base liquid-cooled configuration would exceed MPCA limits at several of the nearest residences. The mitigated air-cooled configuration would not exceed the nighttime limit of 50 dBA L50 for NAC 1 at any modeled residence, with predicted levels ranging from 33 to 43 dBA. Because Xcel Energy modeled the Project's loudest operating conditions to meet the L50 limits, the L10 limits will also be satisfied. The Project is not expected to be a significant contributor to increases in total sound levels in the Sherburne County area.⁶¹

60. Sound control devices on vehicles and equipment (e.g., mufflers) conducting construction activities during daylight hours and running vehicles and

⁵² Ex. App.-1 at 73 (Application).

⁵³ Ex. App.-1 at 83 (Application).

⁵⁴ Ex. App.-1 at 75 (Application).

⁵⁵ Ex. App.-1 at 57 (Application).

⁵⁶ Ex. App.-1 at 75 (Application).

⁵⁷ Ex. App.-1 at 73 (Application).

⁵⁸ Ex. App.-1 at 76 (Application).

⁵⁹ Ex. App.-1 at 76 (Application).

⁶⁰ Ex. App.-1 at 75 (Application).

⁶¹ Ex. App.-1 at 76 (Application).

equipment only when necessary are common ways to mitigate construction noise impacts.⁶²

61. The record demonstrates that Xcel Energy has taken steps to avoid and minimize noise impacts. Further, the DSP requires the permittee to comply with noise standards established under Minnesota noise standards as defined under Minnesota Rule, part 7030.0010 to 7030.0080, and to limit construction and maintenance activities to daytime hours to the extent practicable.⁶³

62. DSP Special Condition 5.2 would require Xcel Energy to file a noise impact assessment summarizing the results of noise propagation modeling (incorporating noise inputs from selected equipment and facility layout) at least 14 days prior to the pre-construction meeting. An updated assessment must be filed prior to any modifications to the facility over its operating life. This condition is consistent with recent Commission permit decisions.⁶⁴ As the EA notes, “[t]he Project is not expected to be a significant contributor to increases in total sound levels in the Sherburne County ROI.”⁶⁵ The primary source of noise during operation will be the power transformer in the substation, inverters, and the cooling system in the cabinets.⁶⁶ The modeling estimates facility-only nighttime noise would not exceed the nighttime limits of 50 dBA L50 for NAC-1 with the use of Sungrow noise mitigative containers for all ESS units.⁶⁷ Accordingly, transformer and inverter noise is consistent with existing noise in the area.

63. To ensure that the Project meets MPCA noise limits, DSP Special Condition 5.3 would require Xcel Energy to use low-noise, air-cooled heat exchangers and perform operational noise monitoring to assess effectiveness. Noise modeling must be updated when augmentation units are to be installed. A proposed post-construction noise study methodology must be filed at least 14 days prior to the pre-construction meeting. The completed post-construction noise study must be filed within 18 months of commencing commercial operation. Operations must be modified or project components removed from service if necessary to comply with MPCA noise standards.⁶⁸

⁶² Ex. App.-1 at 76 (Application).

⁶³ Ex. PUC EIP-1 at 14 (EIP Staff Recommendations on Draft Site Permit and Need for Environmental Assessment Addendum).

⁶⁴ See Ex. PUC EIP-1 at 13-14 (EIP Staff Recommendations on Draft Site Permit and Need for Environmental Assessment Addendum).

⁶⁵ Ex. App.-1 at 76 (Application).

⁶⁶ Ex. App.-1 at 75 (Application).

⁶⁷ Ex. App.-1 at 76 (Application).

⁶⁸ Ex. PUC EIP-1 at 23 (EIP Staff Recommendations on Draft Site Permit and Need for Environmental Assessment Addendum).

4. *Cultural Values.*

64. The Project is not anticipated to impact or alter the work life and leisure pursuits of residents or visitors in the Project Area or affect land use in such a way as to impact the underlying culture or community unity of the area. As the Project site is located on private land, within an established industrial zone, adjacent to similar existing uses, and sufficiently set back from public rights-of-way, impacts to cultural resources from the Project are anticipated to be negligible.⁶⁹

65. Project construction and operation aligns with the environmental goals and standards for new technologies and energy conservation that are stated in the Sherburne County strategic and comprehensive plans. The Project aligns with the natural resources goals of Becker 2040 to preserve non-renewable natural resources and the wise consumption of renewable resources (City of Becker 2021). The Project also aligns with this industrial character and does not encroach upon venues, traditions, or gathering spaces that are central to Becker's community life.⁷⁰

66. Impacts to cultural values or community events are considered to be negligible. No additional mitigation is proposed.⁷¹

5. *Land Use and Zoning.*

67. The Project makes good use of the land. Development of an ESS in this area is consistent with the types of permitted uses in the City of Becker's General Industrial (GI) Zoning District, which was established to provide an area intended to regulate industrial, manufacturing, and related uses, as well as to provide for separation from adjacent commercial or residential uses. The Project is located in an industrial area, sited immediately adjacent to the existing Sherburne County Generating Station and associated infrastructure. The Project is consistent with Becker 2040's vision for strategic industrial expansion, supports key goals related to infrastructure modernization and environmental stewardship, and aligns with the Sherco Master Plan's emphasis on modern, clean energy redevelopment by leveraging existing transmission interconnections and substation infrastructure.⁷²

68. The Project would convert approximately 35 acres of land from its current landcover to impermeable surfaces for the life of the Project for energy storage. Xcel

⁶⁹ Ex. App.-1 at 59-60 (Application).

⁷⁰ Ex. App.-1 at 60 (Application).

⁷¹ Ex. App.-1 at 60 (Application).

⁷² Ex. App.-1 at 83-86 (Application).

Energy intends to utilize best management practices (BMPs) as feasible to reduce the impact on land use.⁷³

69. Xcel Energy has developed a decommissioning plan that will be implemented at the conclusion of the Project. The decommissioning plan outlines the plan to remove all Project-related infrastructure and restore and reclaim the site to pre-Project conditions to the extent feasible.⁷⁴

6. Property Values.

70. Impacts to the value of specific properties within the Project vicinity are difficult to determine but could occur.⁷⁵

71. A 2025 University of Pennsylvania study suggests that utility-scale ESS projects do not measurably affect nearby residential property values. It concludes that utility-scale ESS facilities have a neutral impact on surrounding property values.⁷⁶

7. Tourism and Recreation

72. Tourism in the Project Area centers around outdoor recreation, nature, heritage and museums, and local culture. The City of Becker offers golf courses, local restaurants and breweries, the Becker History Center, seasonal farmers markets, and other community festivals.⁷⁷

73. Recreational activities are available largely through the City of Becker's park system, with popular destinations such as Becker City Park, Carl E. Johnson Park, Kolbinger Park, and Snuffy's Landing, located within one mile of the Project site.⁷⁸ The recreational activities may include fishing, boating, paddleboarding, kayaking, and other water-based recreational experiences. A Sherburne County Snowmobile Trail is present through Snuffy's Landing.⁷⁹

74. Additional tourism in the Project Area related to recreational activities is found at the Becker Community Center--which features an aquatic center, fitness

⁷³ Ex. App.-1 at 84, 118 (Application).

⁷⁴ Ex. App.-1 (Appx. E).

⁷⁵ See Ex. App.-1 at 90 (Application).

⁷⁶ Ex. App.-1 at 90 (Application); Gwee, Yixin. 2025. "The Impact of Utility-Scale Battery Energy Storage System Projects on Property Values in California, Massachusetts, and New York." Master's thesis, The Wharton School, University of Pennsylvania. <https://repository.upenn.edu/entities/publication/985ee8b2-3228-4a70-8f6e-0a92d757fc82> (accessed November 2025).

⁷⁷ Ex. App.-1 at 93 (Application).

⁷⁸ Ex. App.-1 at 86 (Application).

⁷⁹ Ex. App.-1 at 87 (Application).

center, library, gym, and event space under one roof—and the Mississippi River State Water Trail located within one mile of the Project site.⁸⁰

75. No operational impacts to Snuffy's Landing (including the snowmobile trail) or the Mississippi River State Water Trail are anticipated given the Project site will not be visible from these locations due to distance, existing vegetative screening, and the elevation differences.⁸¹

76. There are no Minnesota DNR scientific and natural areas (SNAs), Wildlife Management Areas (WMAs), walk-in access program sites, Aquatic Management Areas, Fishery Management Areas, snowmobile trails, state trails, state parks, or state forests within or adjacent to the Project site.⁸²

77. Xcel Energy will closely coordinate construction activities with the City of Becker and Sherburne County if any road closures are deemed necessary during the construction phase.⁸³

78. The Project is located on private and industrial land. Therefore, impacts are anticipated to be minimal and temporary.⁸⁴ There are no proposed mitigation measures proposed.⁸⁵

8. Transportation and Public Services

79. Potential impacts to the electrical grid, roads and railroads, and other utilities are anticipated to be short-term, intermittent, minor, and negligible during construction.⁸⁶ Impacts to water (wells and septic systems) are not expected to occur.⁸⁷ Impacts to railroads and pipelines are not expected to occur.⁸⁸ Overall, construction-related impacts are expected to be negligible or minor, and are associated with possible traffic delays.⁸⁹ During operation, negligible traffic increases would occur for maintenance.⁹⁰ Impacts are unavoidable but can be minimized.

80. There are no anticipated impacts to geologic or groundwater resources from the Project. No designated sole source aquifers or Wellhead Protection Areas

⁸⁰ Ex. App.-1 at 86 (Application).

⁸¹ Ex. App.-1 at 87 (Application).

⁸² Ex. App.-1 at 86 (Application).

⁸³ Ex. App.-1 at 93 (Application).

⁸⁴ See Ex. App.-1 at 93 (Application).

⁸⁵ Ex. App.-1 at 94 (Application).

⁸⁶ Ex. App.-1 at 80-81 (Application).

⁸⁷ Ex. App.-1 at 81 (Application).

⁸⁸ Ex. App.-1 at 78, 81 (Application).

⁸⁹ Ex. App.-1 at 80-82 (Application).

⁹⁰ Ex. App.-1 at 80 (Application).

(WHPAs) are located within the Project site. The Project site is not located within a karst-rich area, and no karst features have been identified within ten miles of the Project. Construction of Project facilities is not likely to require subsurface blasting; therefore, disturbances to groundwater flow from newly fractured bedrock are not anticipated. Project facilities are not likely to affect the use of existing active or abandoned and Company-sealed water wells.⁹¹

81. Xcel Energy intends to properly manage the wells during construction to avoid all potential impacts to groundwater. If any previously unmapped wells are discovered, Xcel Energy will coordinate with the Minnesota Department of Health (MDH) and the well owner to mitigate potential impacts, and will also cap and abandon the well in place in accordance with MDH requirements.⁹²

82. Xcel Energy is the electric provider serving the immediate vicinity and many of the industrial users surrounding the Project.⁹³ The Project will negligibly impact existing utilities during the interconnection of the Project substation to the Sherburne County Substation.⁹⁴

83. The Land Control Area is accessible from U.S. Highway 10, Liberty Lane, and Industrial Boulevard. No impacts to roads are anticipated during the operation; negligible traffic increases would occur for maintenance.⁹⁵

84. No railroads are located within the Project site and therefore will not be impacted.⁹⁶

9. Socioeconomics.

85. The potential impact intensity level is anticipated to be both short- and long-term minimal benefits. Effects associated with construction will, overall, be short-term and minimal. Significant positive effects may occur for individuals. Impacts from operation will be long-term and negligible.⁹⁷

86. Construction of the Project is likely to result in increased expenditures for lodging, food and fuel, transportation, and general supplies at local businesses during construction. Construction of the Project will create local job opportunities for various

⁹¹ Ex. App.-1 at 109 (Application).

⁹² Ex. App.-1 at 109 (Application).

⁹³ Ex. App.-1 at 79 (Application).

⁹⁴ Ex. App.-1 at 81 (Application).

⁹⁵ See Ex. App.-1 at 80 (Application).

⁹⁶ Ex. App.-1 at 81 (Application).

⁹⁷ Ex. App.-1 at 89-90 (Application).

trade professionals and will also generate and circulate income throughout the community by investing in local business expenditures as well as state and local taxes.⁹⁸

87. The Project is expected to create approximately 150 workers on site during the construction phase, and 10 long-term personnel during the operations phase.⁹⁹

88. Once the Project is operational, Xcel Energy will pay property tax payments of approximately \$234 million to the City of Becker and Sherburne County over the anticipated twenty-year life of the Project.¹⁰⁰

89. As socioeconomic impacts are anticipated to be beneficial.¹⁰¹

10. Environmental Justice.

90. Environmental justice (EJ) means the “fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income in the development, implementation, and enforcement of environmental laws, regulations, and policies.”¹⁰²

91. In Minnesota, EJ areas are defined as census tracts:

- in which at least 40 percent of the population is nonwhite
- in which at least 35 percent of households have income at or below 200 percent of the federal poverty level
- in which at least 40 percent of the population has limited proficiency in English; or
- which are located within Indian Country, which is defined as federally recognized reservations and other Indigenous lands.¹⁰³

92. The Project is not located within any EJ areas of concern. As such, there are no EJ impacts.

B. Public Health Safety and Emergency Services.

⁹⁸ Ex. App.-1 at 89 (Application).

⁹⁹ Ex. App.-1 at 89-90 (Application).

¹⁰⁰ Ex. App.-1 at 90 (Application).

¹⁰¹ Ex. App.-1 at 90 (Application).

¹⁰² See Ex. App.-1 at 61 (Application).

¹⁰³ See Ex. App.-1 at 60 (Application).

93. Minnesota law requires consideration of the Project's potential effect on health and safety.¹⁰⁴

1. Electric and Magnetic Fields (EMF).

94. There are no federal or Minnesota-specific regulations regarding extremely low frequency electro and magnetic fields produced by power lines; however, the International Commission on Non-Ionizing Radiation Protection has established a widely accepted public exposure guideline of 833 milligauss (mG).¹⁰⁵

95. The Commission has adopted a maximum electric field limit of eight kV per meter (measured one meter above ground) but has not adopted a magnetic field standard.¹⁰⁶

96. Primary EMF sources will be the electrical feeder lines, inverter transformers, and the gen-tie line between the Project substation and Sherburne County Substation. Transformers will be enclosed in grounded metal casings to shield and reduce EMF emissions. The battery side will operate using direct current (DC) at approximately 50 volts per cell, producing a static magnetic field that decays exponentially with distance.¹⁰⁷

97. No health impacts from EMF are anticipated. EMF decreases rapidly with distance; the nearest occupied residence is approximately 1,285 feet from the proposed electrical equipment and 1,325 feet from the nearest inverter. At these distances, fields will have dissipated to background levels, and no measurable magnetic field is anticipated beyond the Project's fenced boundary. No additional mitigation is proposed.¹⁰⁸

2. Public Safety and Emergency Services

98. The Project will be designed and constructed in compliance with applicable electric codes, with all electrical equipment and infrastructure grounded per federal and state standards. Electrical work will be completed by trained and qualified personnel.¹⁰⁹

99. The Project's construction and operation will have negligible impacts on the security and safety of the local populace, yet it could increase demand for emergency

¹⁰⁴ Minn. Stat. § 216I.05, subd. 4(a)(2).

¹⁰⁵ See Ex. App.-1 at 66 (Application).

¹⁰⁶ See Ex. App.-1 at 66 (Application).

¹⁰⁷ See Ex. App.-1 at 65, 67 (Application).

¹⁰⁸ See Ex. App.-1 at 65, 67-68, 72 (Application).

¹⁰⁹ See Ex. App.-1 at 71 (Application).

and public health services. On-the-job injuries of construction workers requiring assistance due to slips, trips or falls, equipment use, or electrocution can create a demand for emergency, public health, or safety services that would not exist if the Project were not to be built.¹¹⁰

100. The main safety hazard of an ESS is battery failure leading to thermal runaway which has the potential to spread to nearby batteries and containers, quickly presenting an emergency. However, modern containment, monitoring, and suppression systems have made ESS facilities highly resistant to large-scale fire propagation.¹¹¹

101. In the unlikely worst-case scenario of a thermal runaway or fire event, the Project site is not adjacent to public roadways, making road shutdowns due to hazardous conditions unlikely.¹¹²

102. Xcel Energy will design, construct, and test all ESS equipment in compliance with industry-recognized standards, including Underwriters Laboratories (UL) 1973, UL 9540, and Institute of Electrical and Electronics Engineers (IEEE) Standard 1547. The ESS equipment will also meet or exceed relevant safety standards applicable at the time of final design, including National Fire Protection Association (NFPA) 68 (Explosion Venting), NFPA 69 (Explosion Prevention Systems), and NFPA 855 (Standard for the Installation of Stationary Energy Storage Systems). The Project will further comply with the latest edition of the International Fire Code, the National Electrical Code (NFPA 70), and the guidelines outlined in NFPA 850 and IEEE 979.¹¹³

103. ESS equipment will undergo UL 9540A testing for thermal runaway fire propagation, conducted by an Occupational Safety and Health Administration (OSHA)-recognized independent third-party laboratory, with test data covering thermal runaway behavior, gas generation, and gas composition.¹¹⁴

104. Xcel Energy will use Lithium Iron Phosphate (LFP) battery technology, with each battery factory sealed by Sungrow. ESS units will be housed in separate, modular non-walk-in structures with external access only, providing spatial separation that aids heat management and reduces fire propagation risk. Each unit includes integrated HVAC, remote monitoring sensors and controls, and built-in fire, smoke, and gas detection. Equipment spacing will minimize fire propagation risk. An advanced monitoring system tracks parameters at the cell, module, rack, and system levels, with

¹¹⁰ See Ex. App.-1 at 66 (Application).

¹¹¹ See Ex. App.-1 at 66 (Application).

¹¹² See Ex. App.-1 at 66 (Application).

¹¹³ See Ex. App.-1 at 70 (Application).

¹¹⁴ See Ex. App.-1 at 70 (Application).

automated control logic that disconnects battery strings or individual racks if operational limits are exceeded.¹¹⁵

105. Construction must comply with federal and state OSHA requirements and all applicable regulations regarding facility installation and worker qualifications. Workers will receive proper training to reduce associated risks. The ESS facility and Project substation will be secured with permanent fencing, lockable gates, and prominent warning signage, with access restricted to authorized personnel.

106. Xcel Energy will develop a Project-specific Emergency Response Plan (ERP) in coordination with local emergency responders prior to construction. As requested by the City of Becker and the Commission, a Project information sheet on fire suppression practices and the ERP will be provided to local emergency responders, with a formal training session planned before construction begins. The ERP will mandate quarterly on-site safety drills and annual training for local first responders, and will be provided to the Commission prior to operation. Construction and operation of the Project will have negligible impacts on local safety.

107. At the in-person hearing held on March 18, 2025, the Mayor of the City of Becker appeared and spoke on behalf of the joint fire board for the City of Becker and Becker Township. The Mayor requested that Xcel Energy engage in early coordination with the joint fire board regarding the Company's activities in the area. Xcel Energy agreed to work with the joint fire board to provide such early coordination.¹¹⁶

108. DSP Section 5.6 requires Xcel Energy to file a Hazard Mitigation Analysis (HMA) detailing the testing results for the selected equipment and the risks associated with the technology at least 30 days prior to the pre-construction meeting.¹¹⁷

109. Xcel Energy will use lithium ion phosphate (LFP) technology, and Sherco's facility design uses modular containers that are tested by the manufacturer to ensure fire resistance.¹¹⁸ Modern ESS containers include explosion prevention systems to remove flammable gases during a thermal runaway event and relieve pressure to limit gas levels within the containers from reaching levels that can be flammable or explosive.¹¹⁹ The containers are spaced to minimize the potential for fire to spread to

¹¹⁵ See Ex. App.-1 at 69, 70-72, 75 (Application).

¹¹⁶ Becker Public Hearing on 3-18-2026 (April 3, 2026) (eDocket No. 20264-229991-01).

¹¹⁷ See Ex. PUC EIP-1 at 14 (EIP Staff Recommendations on Draft Site Permit and Need for Environmental Assessment Addendum).

¹¹⁸ Ex. App.-1 at 13-14 (Application).

¹¹⁹ See Ex. App.-1 at 70 (Application).

other containers.¹²⁰ The ESS equipment is monitored remotely, tracking cell voltage and temperature to identify and isolate potential issues before they occur. The facility will also install fire detection systems at the containers to recognize incidents and disconnect and isolate failed equipment.¹²¹

110. The record demonstrates that Xcel Energy has taken steps to avoid and minimize impacts to public safety and emergency services. Further, public safety is addressed in Sections 4.3.5, 4.3.7, 4.3.11, 4.3.19, 4.3.25, 4.3.27, 4.3.28, 4.3.29, 4.3.31, 4.4, and 4.5.1 of the DSP.¹²²

C. Land-Based Economics.

111. Minnesota law requires consideration of the Project's potential effect on land-based economies – specifically, agriculture, forestry, tourism, and mining.¹²³

112. The Project is not anticipated to have impacts on agriculture, forestry, and mining.¹²⁴ The Project will have minimal impacts on tourism and recreation, as discussed in Section A(7) above.

D. Archaeological, Cultural, and Historic Resources.

113. Minnesota law requires consideration of the Project's potential effects on historic and archaeological resources.¹²⁵

114. Xcel Energy conducted a Phase I cultural resource field survey within the preliminary development area to identify previously recorded archaeological and historic architectural resources within the Project on June 9, 2025. This review also examined records from the Minnesota State Historic Preservation Office (SHPO) and Minnesota Office of the State Archeologist for an area within one mile of the site boundary. The literature review did not identify any previously recorded archaeological resources or National Register of Historic Places properties within one mile of the site.¹²⁶

115. On November 14, 2025, SHPO provided Xcel Energy a letter stating that they agree there are no significant archaeological sites within the Project Area ROI and

¹²⁰ See Ex. App.-1 at 70 (Application).

¹²¹ See Ex. App.-1 at 13 (Application).

¹²² See Ex. PUC EIP-1 at 4-6, 8, and 10-12 (EIP Staff Recommendations on Draft Site Permit and Need for Environmental Assessment Addendum).

¹²³ Minn. Stat. §216I.05, subd. 4(a)(3).

¹²⁴ Ex. App.-1 at 91-93 (Application).

¹²⁵ Minn. Stat. §216I.05, subd. 4(a)(4).

¹²⁶ Ex. App.-1 at 94 (Application).

there are no properties listed in the National or State Registers of Historic Places, or within the Historic Sites Network, that will be affected by this Project.¹²⁷

116. Section 4.3.20 of the DSP requires the permittee to avoid impacts to archaeological and historic resources where possible and to mitigate impacts where avoidance is not possible.¹²⁸

E. Natural Resources.

117. Minnesota law requires consideration of the Project's potential effects on the natural environment, including effects on air and water quality resources and flora and fauna.¹²⁹

1. Air Quality and Greenhouse Gases.

118. Minimal intermittent air emissions are expected during construction of the Project. Air emissions associated with construction are highly dependent upon weather conditions and the specific activity occurring. For example, traveling to a construction site on a dry gravel road will result in more fugitive dust than traveling the same road when wet. Once operational, neither the generating facility nor the transmission line will generate criteria pollutants or carbon dioxide.¹³⁰

119. Exhaust emissions can be minimized by keeping vehicles and equipment in good working order and not running equipment unless necessary. Watering exposed surfaces, covering disturbed areas, and reducing speed limits on-site are all standard construction practices.¹³¹

120. Section 4.3.29 of the DSP requires Xcel Energy to use non-chloride dust control products during construction.¹³²

121. Anticipated air quality and greenhouse gas (GHG) impacts during the construction of the Project are expected to be minimal and primarily confined to a close proximity to the Project site.¹³³

¹²⁷ Ex. App.-1 at 95 (Application).

¹²⁸ See Ex. PUC EIP-1 at 9 (EIP Staff Recommendations on Draft Site Permit and Need for Environmental Assessment Addendum).

¹²⁹ Minn. Stat. §216I.05, subd. 4(a)(5).

¹³⁰ Ex. App.-1 at 101 (Application).

¹³¹ Ex. App.-1 at 103 (Application).

¹³² See Ex. PUC EIP-1 at 11 (EIP Staff Recommendations on Draft Site Permit and Need for Environmental Assessment Addendum).

¹³³ Ex. App.-1 at 101 (Application).

122. GHG emission estimates demonstrate that the Project will have a minimal contribution to statewide GHG emissions and is consistent with Minnesota’s decarbonization and clean energy transition goals.¹³⁴

123. Air quality impacts on the surrounding environment are expected to be negligible due to the short-term and intermittent nature of construction-related emissions.¹³⁵

124. As a component of the construction stormwater permit (CSW Permit) that will be obtained for the Project, a National Pollutant Discharge Elimination System/State Disposal System (NPDES/SDS), CSW Permit, and an associated Stormwater Pollution Prevention Plan (SWPPP) will be developed and implemented prior to construction in order to minimize the potential for fugitive dust emissions.¹³⁶

125. Xcel Energy will use BMPs during construction and operation of the Project to minimize dust and emissions.¹³⁷

2. *Geology and Groundwater.*

126. The Land Control Area was reviewed for wells listed on the Minnesota Well Index (MWI) and MDH WHPAs. The MWI identified one well within the site and it identified 77 wells within the Project Area, which are predominantly domestic wells and monitoring wells, with the remaining wells used for “other” purposes.¹³⁸

127. There is no anticipation that the well located within the Project site, Well 133374, will be impacted by the Project. Specifically, the proposed gen-tie near the location of the well will avoid impacts to the well’s capture zone by adhering to applicable setback requirements, implementation of erosion and sediment controls, and minimized ground disturbances in proximity to the buffer.¹³⁹

128. Xcel Energy intends to properly manage the wells during construction to avoid all potential impacts to groundwater. Impacts on groundwater resources (including aquifers) are not anticipated during operation of the Project as water supply needs are limited. If field crews discover an unmapped well not identified in available

¹³⁴ Ex. App.-1 at 102 (Application).

¹³⁵ Ex. App.-1 at 102 (Application).

¹³⁶ Ex. App.-1 at 110-11 (Application).

¹³⁷ Ex. App.-1 at 103 (Application).

¹³⁸ Ex. App.-1 at 105-06 (Application).

¹³⁹ Ex. App.-1 at 106 (Application).

mapping resources or Xcel Energy records, Xcel Energy will coordinate with the MDH and the well owner to mitigate potential impacts.¹⁴⁰

129. Because the Project will disturb more than one acre, Xcel Energy must obtain a CSW Permit from the MPCA. The CSW Permit will identify BMPs for erosion prevention and sediment control. As part of the CSW Permit, Xcel Energy will also develop a SWPPP that describes construction activity, temporary and permanent erosion, and sediment controls, BMPs, and permanent stormwater management that will be implemented during construction and through the life of the Project. Implementation of the protocols outlined in the SWPPP will minimize the potential for soil erosion and detail stormwater management methods during construction and operation of the facility.¹⁴¹

130. Disturbance to groundwater flow from construction activities are not anticipated. Any dewatering required during construction will be managed in accordance with the SWPPP and discharged to the surrounding area, thereby allowing it to infiltrate back into the ground to minimize potential impacts.¹⁴²

3. Soils.

131. Primary impacts to soils include compaction from construction equipment, grading, and trenching down to install electrical lines. Overall soil impacts are considered to be moderate.¹⁴³

132. Xcel Energy is committed to mitigating soil impacts by minimizing soil compaction, preserving topsoil, and establishing and maintaining appropriate vegetation in accordance with BMPs found in the requirements of the SWPPP and outlined in the Applicant's VMP.¹⁴⁴

133. Sections 4.3.9, 4.3.10, 4.3.11, 4.3.18, and 4.3.23 of the DSP address soil-related impacts from the Project.¹⁴⁵

¹⁴⁰ Ex. App.-1 at 109 (Application).

¹⁴¹ Ex. App.-1 at 110-11 (Application).

¹⁴² Ex. App.-1 at 109 (Application).

¹⁴³ Ex. App.-1 at 113-14 (Application).

¹⁴⁴ Ex. App.-1 at 114-15 (Application).

¹⁴⁵ See Ex. PUC EIP-1 at 5-6, 8, and 10 (EIP Staff Recommendations on Draft Site Permit and Need for Environmental Assessment Addendum).

4. *Surface Water and Floodplains.*

134. The Project is not expected to impact surface waters due to the absence of wetlands, waterways, waterbodies, and floodplains.¹⁴⁶

135. BMPs to minimize the impact on adjacent surface waters will be utilized as a part of the SWPPP, including but not limited to designing battery enclosures and other electrical equipment to prevent water ingress and maintain structural integrity under extreme weather conditions.¹⁴⁷

136. The record demonstrates that Xcel Energy has taken steps to avoid and minimize surface water and floodplain impacts.¹⁴⁸ Further, Section 4.3.11 of the DSP requires the permittee to implement erosion prevention and sediment control practices recommended by the MPCA. This section also requires the permittee to implement erosion and sediment control measures, grade contours to provide for proper drainage, and restore all disturbed areas to pre-construction conditions.¹⁴⁹

5. *Wetlands.*

137. Xcel Energy sited the Project to avoid wetlands delineated to date.¹⁵⁰

138. Xcel Energy reviewed desktop resources, such as the National Wetlands Inventory (NWI) data, aerial photography, hydric soils map units, and digital elevation models, and confirmed that there are no NWI wetlands present within the Project site.¹⁵¹

139. The record demonstrates that Xcel Energy has taken steps to avoid and minimize impacts to wetlands.¹⁵² Further, Section 4.3.13 of the DSP prohibits placement of the ESS or associated facilities in public waters and public waters wetlands.¹⁵³

¹⁴⁶ Ex. App.-1 at 116 (Application).

¹⁴⁷ Ex. App.-1 at 116 (Application).

¹⁴⁸ Ex. App.-1 at 115 (Application).

¹⁴⁹ See Ex. PUC EIP-1 at 6 (EIP Staff Recommendations on Draft Site Permit and Need for Environmental Assessment Addendum).

¹⁵⁰ Ex. App.-1 at 115 (Application).

¹⁵¹ Ex. App.-1 at 115 (Application); Ex. App.-1 Figure 11 (Appx. I) .

¹⁵² Ex. App.-1 at 115 (Application).

¹⁵³ See Ex. PUC EIP-1 at 6 (EIP Staff Recommendations on Draft Site Permit and Need for Environmental Assessment Addendum).

6. *Vegetation.*

140. The Project is in the Eastern Broadleaf Forest Province (222), Minnesota & NE Iowa Morainal Section (222M), and the Anoka Sand Plain Subsection (222Mc) of the Ecological Classification System (“ECS”).¹⁵⁴

141. Construction of the facility will eliminate vegetative cover and create impermeable surfaces at the access road and the developed area of the facility. Xcel Energy estimates that approximately 35 acres will be converted to impermeable surfaces the life of the facility.¹⁵⁵

142. Following construction, Xcel Energy plans to reestablish areas where non-native vegetation was removed using Minnesota state seed mix, which is a non-native grassland mix. Xcel Energy indicates it plans to reestablish areas where native vegetation was removed.¹⁵⁶

143. EIP Staff submitted formal comments to promote a transparent record and guide a pre-construction VMP in coordination with the Vegetation Management Plan Working Group (VMPWG), using BMPs established by the DNR and Board of Water & Soil Resources (BWSR). Under proposed Special Condition 5.1, EIP recommends that the VMP and documentation of coordination efforts must be filed at least 14 days prior to the pre-construction meeting. EIP recommends that the VMP must include: short-term and long-term management objectives; planned restoration and vegetation management activities; monitoring and evaluation methods; management tools and timing; identification of the third-party contractor; identification of on-site noxious weeds and invasive species; and a marked-up copy of the Site Plan showing revegetation and seed mixes.¹⁵⁷

144. The DNR submitted formal comments recommending Xcel Energy’s VMP include a more detailed explanation of the vegetation reestablishment phases in areas where vegetation removal is anticipated within the surrounding project boundary. The DNR advises the VMP include an explanation of the types of plant species Xcel Energy intends to use as part of the vegetation reestablishment process.¹⁵⁸

145. Xcel Energy submitted reply comments through its direct testimony on March 11, 2026, stating that it remains committed to working cooperatively and

¹⁵⁴ Ex. App.-1 at 48 (Application).

¹⁵⁵ See Ex. App.-1 at 118 (Application).

¹⁵⁶ Ex. App.-1 at 118 (Application).

¹⁵⁷ See Ex. PUC EIP-1 at 13 (EIP Staff Recommendations on Draft Site Permit and Need for Environmental Assessment Addendum).

¹⁵⁸ Ex. PUC-6 (DNR’s Comments on Site Permit and Environmental Assessment).

alongside the DNR to address any outstanding concerns as the Project advances through the permitting process.¹⁵⁹

146. DSP Section 5.7 is a special condition that requires Xcel Energy to develop a tree replacement plan in coordination with the DNR and Sherburne County to replace any trees removed for construction and file the plan at least 14 days before the pre-construction meeting. Replacement trees may be planted on public lands with the permission of the public entity/owner. Staff notes the project is anticipated to clear approximately 35 acres of land.¹⁶⁰

147. The record demonstrates that Xcel Energy has taken steps to avoid and minimize impacts to vegetation.¹⁶¹ Further, Sections 4.3.15, 4.3.16, 4.3.17, and 4.3.18 of the DSP address impacts to vegetation.¹⁶²

7. Wildlife and Habitat.

148. The Land Control Area is mostly vegetative cover (71 percent) which provides varied habitats for wildlife. Developed areas (29 percent) in the site provides less suitable habitat for wildlife.¹⁶³

149. The Project is located within the Mississippi Flyway, which is a major north-south migration route.¹⁶⁴ It is also located in the Prairie Hardwood Transition Bird Conservation Region.¹⁶⁵ Field investigations in March 2025 did not identify any high-quality or unique nesting habitat within the Project site for listed avian species, and observers did not note any stick nests within the Project site.¹⁶⁶

150. Xcel Energy does not anticipate impacts to bald eagles from the Project because no suitable nesting habitat exists within the Project site, and surveyors did not observe any stick nests during a March 2025 site visit conducted under leaf-off conditions.¹⁶⁷

151. Though limited tree clearing is expected within the Project site, impacts to birds selecting forested habitats are not anticipated due to the greater quality habitat

¹⁵⁹ Ex. App-3 at 7 (Direct Testimony of Jordan Clitty and Schedule 1).

¹⁶⁰ See Ex. PUC EIP-1 at 15 (EIP Staff Recommendations on Draft Site Permit and Need for Environmental Assessment Addendum).

¹⁶¹ Ex. App.-1 at 118 (Application).

¹⁶² See Ex. PUC EIP-1 at 7-8 (EIP Staff Recommendations on Draft Site Permit and Need for Environmental Assessment Addendum).

¹⁶³ Ex. App.-1 at 119 (Application).

¹⁶⁴ Ex. App.-1 at 119 (Application).

¹⁶⁵ Ex. App.-1 at 119 (Application).

¹⁶⁶ Ex. App.-1 at 120 (Application).

¹⁶⁷ Ex. App.-1 at 127 (Application).

southwest of the Project site. Xcel Energy has coordinated with the U.S. Fish and Wildlife Service (USFWS) and DNR regarding avoidance and minimization measures for potentially suitable habitat for protected species.¹⁶⁸

152. There are no waterfowl feeding and resting areas within one mile of the site.¹⁶⁹

153. There are no Audubon Important Bird Areas (IBA), within one mile of the Project site.¹⁷⁰

154. Xcel Energy proposes fencing around the Project, which does create potential for wildlife impacts. Although deer can jump many fences, they can become tangled in both smooth and barbed-wire fences. Predators can also use fences to corner and kill prey species. Nevertheless, the Project has a relatively small footprint and the Project site has an industrial nature, thus the fencing impact is anticipated to be minor.¹⁷¹

155. The DNR submitted a formal comment recommending additional analysis of potential wildlife impacts caused by the security fence, including how the approximately 5,500 feet of permanent fencing could impede wildlife travel corridors. The DNR noted that the EA does not address how the security fence will impact wildlife movement, and that such analysis is consistent with available EAs for other ESS projects.¹⁷²

156. The DNR recommended that the site permit include a special condition requiring the Permittee to coordinate with the DNR to finalize the security fencing plan, similar to Special Condition 5.7 included in the permitted Snowshoe Energy Storage Project (Docket ESS-24-279).¹⁷³

157. The impact the security fencing is anticipated to have on wildlife is expected to be minor.¹⁷⁴

158. The DNR submitted formal comments recommending tree removal be avoided from June 1 to August 15 to protect nesting birds and roosting bats from direct

¹⁶⁸ Ex. App.-1 at 121 (Application).

¹⁶⁹ Ex. App.-1 at 120 (Application).

¹⁷⁰ Ex. App.-1 at 121 (Application).

¹⁷¹ Ex. App.-1 at 122 (Application).

¹⁷² Ex. PUC-6 (DNR's Comments on Site Permit and Environmental Assessment).

¹⁷³ Ex. PUC-6 (DNR's Comments on Site Permit and Environmental Assessment).

¹⁷⁴ Ex. App.-1 at 122 (Application).

impacts during construction. The DNR supports a special condition requiring the Permittee to avoid tree clearing from June 1 to August 15.¹⁷⁵

159. Xcel Energy submitted reply comments through its direct testimony on March 11, 2026 wherein it opposed the inclusion of a blanket seasonal tree-clearing restriction prohibiting tree removal from June 1 to August 15. The record does not support such a broad prohibition: there are no known Northern Long-Eared Bat (NLEB) maternity roost trees or hibernacula in Sherburne County, and the Project site contains only limited amounts of suitable forested habitat, consisting primarily of sparse conifers. A rigid seasonal prohibition would unnecessarily constrain Xcel Energy's construction schedule without a corresponding environmental benefit proportionate to the restriction.¹⁷⁶

160. Xcel Energy asserted that rather than imposing a blanket restriction unsupported by site-specific conditions, the Commission should adopt a permit condition requiring Xcel Energy to coordinate directly with the USFWS regarding the timing of tree-clearing and any other construction or restoration actions that may impact the NLEB, and to maintain records of compliance for Commission staff review upon request. This approach ensures that any tree-clearing activities are carried out in a manner informed by the best available science and current federal guidance, while preserving the scheduling flexibility necessary for Xcel Energy to meet the Project's anticipated commercial operation date. Coordination with the USFWS—the federal agency with direct authority over listed species—provides a more targeted, science-based safeguard than an arbitrary calendar-based restriction that bears no demonstrated nexus to actual habitat conditions at this site.¹⁷⁷

161. DSP Special Permit Condition 5.4 is a blanket prohibition forbidding Xcel Energy from removing trees from the site from June 1 to August 15 to protect nesting birds and roosting bats.¹⁷⁸

162. There are no known NLEB maternity roost trees or hibernacula in Sherburne County, and the Project site contains only limited suitable forested habitat, primarily sparse conifers.¹⁷⁹

163. DSP 4.3.15's tree-removal minimization requirements, Special Condition 5.7's DNR-coordinated tree replacement plan, Special Condition 5.1's comprehensive

¹⁷⁵ Ex. PUC-6 (DNR's Comments on Site Permit and Environmental Assessment).

¹⁷⁶ Ex. App-3 (Direct Testimony of Jordan Clitty and Schedule 1).

¹⁷⁷ Ex. App-3 (Direct Testimony of Jordan Clitty and Schedule 1).

¹⁷⁸ See Ex. PUC EIP-1 14 (EIP Staff Recommendations on Draft Site Permit and Need for Environmental Assessment Addendum).

¹⁷⁹ Ex. App.-1 at 123 (Application).

VMP, and Section 4.3.30's wildlife-friendly erosion control requirements already collectively provide robust wildlife and vegetation protections.¹⁸⁰

164. Xcel Energy proposed the Commission replace Special Condition 5.4 with the following language, given that the record demonstrates the blanket prohibition is unnecessary for the reasons stated in finding 155 and 156:

The Permittee will coordinate with the U.S. Fish and Wildlife Service regarding the timing of tree-clearing and any other construction or restoration actions that may impact the Northern Long Eared Bat. The Permittee shall keep records of compliance with this section and provide them upon the request of Commission staff.

165. The record demonstrates that Xcel Energy has taken steps to avoid and minimize impacts to wildlife and habitat.¹⁸¹ Further, Sections 4.3.30 and 8.13 of the DSP specify measures that will minimize impacts to wildlife.¹⁸²

8. Climate Change.

166. The Project will help shift energy production in Minnesota and the upper Midwest toward carbon-free sources. Construction emissions will have a short-term negligible increase in GHGs that contribute to climate change. The Project's design incorporates design elements that minimize impacts from the increase in extreme weather events such as increase flooding, storms, and heat wave events that are expected to accompany a warming climate.¹⁸³

167. ESS systems can enable greater integration of renewable energy and maintain grid stability and provide backup power during extreme weather events.¹⁸⁴

168. The ESS enclosures selected for the Project are designed to withstand wind, rain, snow, and ice events. Final design will include a safety factor for snow and wind loads for components and equipment pads.¹⁸⁵

¹⁸⁰ See Ex. PUC EIP-1 at 7-8, 11, 13, 15 (EIP Staff Recommendations on Draft Site Permit and Need for Environmental Assessment Addendum).

¹⁸¹ Ex. App.-1 at 121 (Application).

¹⁸² See Ex. PUC EIP-1 at 11 and 19 (EIP Staff Recommendations on Draft Site Permit and Need for Environmental Assessment Addendum).

¹⁸³ See Ex. App.-1 at 100-02 (Application).

¹⁸⁴ See Ex. App.-1 at 100-01 (Application).

¹⁸⁵ See Ex. App.-1 at 103 (Application).

F. Rare and Unique Resources.

169. Minnesota law requires consideration of the Project's potential effects on rare and unique natural resources.¹⁸⁶

170. Minnesota Biological Survey (MBS) systematically collects, interprets, and provides baseline data on the distribution and ecology of rare plants, rare animals, and native plant communities. There is an MBS site located immediately south of the Project site, approximately 25 feet. The South Becker 12 MBS site has a rank of "Moderate". Within this MBS, there is one southern dry-mesic oak (maple) woodland native plant community (native plant community code: FDs37) present.¹⁸⁷

171. Xcel Energy spoke with DNR on October 24, 2025, to present the Project, discuss BMPs to avoid and minimize potential impacts to the nearby MBS Site, native seeding protocols in the VMP, recommended time of year restrictions for tree clearing, and summary of the City of Becker determining that the Project is a permitted use in the Wild and Scenic River Overlay District.¹⁸⁸

172. Xcel Energy conducted a species and habitat survey on September 24, 2025. This survey identified two federally proposed threatened species, the monarch butterfly (*Danaus plexippus*), and the western regal fritillary (*Argynnis idalia occidentalis*); and one federally designated as non-essential experimental population, the whooping crane (*Grus americana*), as potentially occurring within or near the Project site. The Project site does not overlap any critical habitat—there are no known NLEB or tri-colored bat maternity roost trees or hibernaculum in Sherburne County; however, the species may still occur within or near the Project site.¹⁸⁹

173. Minnesota DNR performed an NHIS review, providing results on September 9, 2025 and concluded that impacts to state-listed species are not anticipated. Nevertheless, it recommended that tree removal be avoided from June 1 through August 15 to minimize potential impacts to bats.¹⁹⁰

174. "Native Prairie" is defined as land that has never been plowed where native prairie vegetation originating from the Project site currently predominates or, if disturbed, is predominantly covered with native prairie vegetation that originated from the Project site.¹⁹¹

¹⁸⁶ Minn. Stat. § 216I.05, subd. 4(a)(8).

¹⁸⁷ Ex. App.-1 at 124 (Application).

¹⁸⁸ Ex. App.-1 at 126 (Application).

¹⁸⁹ Ex. App.-1 at 123 (Application).

¹⁹⁰ Ex. App.-1 at 123 (Application).

¹⁹¹ Minn. Stat. § 84.02.

175. The Project site's current condition is comprised of previously disturbed grassland with scattered shrubs and small trees. The Project site is comprised of barren land and sparse forested areas, with no native prairie present.¹⁹²

176. The record demonstrates that Xcel Energy has taken steps to avoid and minimize impacts to rare and unique resources.¹⁹³

G. Application of Various Design Considerations.

177. Minnesota law requires consideration of the application of design options that maximize energy efficiencies, mitigate adverse environmental effects, and could accommodate expansion of transmission or generating capacity.¹⁹⁴

178. Xcel Energy considered locating the Sherco West Battery Energy Storage System Project adjacent to the Sherco Solar 1 Project, northwest of the intersection of River Road SE and 115th Avenue in the City of Becker. Xcel Energy determined that this location did not provide sufficient space to accommodate all Sherco West Battery Energy Storage System facilities. Xcel Energy considered the Sherco South Battery Energy Storage System Project only at its current location, and did not further evaluate alternative locations. The current location has room for future augmentation that may be required over time. Through the selection of the current location, Xcel Energy has accommodated for future expansion.¹⁹⁵

179. Xcel Energy selected the proposed Project site based on a variety of factors, including its minimal environmental impacts, proximity to the electrical grid and existing transmission infrastructure, existing land ownership, adequate space for energy storage facilities, and available grid capacity for interconnection. The proposed Project site was identified based on these factors.¹⁹⁶

H. Use of Existing Rights-of-Way.

180. Minnesota law requires consideration of the use of existing rights-of-way.¹⁹⁷

181. To minimize new rights-of-way consistent with Minn. Stat. § 216I.05, subd. 3(b), the Project's interconnection will utilize the existing Sherburne County

¹⁹² Ex. App.-1 at 127 (Application).

¹⁹³ Ex. App.-1 at 126 (Application).

¹⁹⁴ Minn. Stat. § 216I.05, subd. 3(b)(10), subd. 3(b)(14).

¹⁹⁵ Ex. App.-1 at 34, 41 (Application).

¹⁹⁶ Ex. App.-1 at 41 (Application).

¹⁹⁷ Minn. Stat. §§ 216I.05, subd. 3(b)(7), (11).

Substation and a short gen-tie line with dead-end structure at the existing and Project substations.¹⁹⁸

I. Electrical System Reliability.

182. Minnesota law requires consideration of electrical system reliability.¹⁹⁹

183. The Project will enhance the electrical system reliability by helping Xcel Energy to meet its need for approximately 600 MW of additional ESS capacity by 2030 to enable renewable integration, reduce curtailment of wind and solar during low-demand periods, and provide essential ancillary and reliability services necessary for safe and stable grid operations. In doing so, Xcel Energy supports Minnesota's transition to carbon-free resources while maintaining dependable grid performance.²⁰⁰

J. Cost of Constructing, Operating, and Maintaining the Facility.

184. Minnesota law requires consideration of the costs of constructing, operating, and maintaining a facility which are dependent on design and route.²⁰¹

185. Xcel Energy estimates the total installed capital cost to construct the Project to be between approximately \$698 million and \$1.03 billion. Actual costs will depend on final material and labor costs. Xcel Energy estimates annual operations and maintenance costs between approximately \$6.8 and \$10 million.²⁰²

K. Adverse Human and Natural Environmental Effects that Cannot be Avoided.

186. Minnesota law requires consideration of the adverse human and natural environmental effects that cannot be avoided. Resource impacts are unavoidable when an impact cannot be avoided even with mitigation strategies.²⁰³

187. As discussed above, most of the unavoidable impacts are associated with construction and therefore temporary. Unavoidable adverse effects associated with construction of the Project (in some instances a specific phase of construction) would last through construction and include:

¹⁹⁸ Ex. App.-1 at 15-16 (Application).

¹⁹⁹ Minn. Stat. § 216I.05, subd. 11(b)(13).

²⁰⁰ See Ex. App.-1 at 7 (Application).

²⁰¹ Minn. Stat. § 216I.05, subd. 3(b)(9).

²⁰² Ex. App.-1 at 8 (Application).

²⁰³ Minn. Stat. § 216I.05, subd. 4(a)(9).

- Noise and vibration emitted from vehicles and equipment during construction that will be audible to neighboring landowners;
- Air emissions from the exhaust of diesel and gasoline-powered equipment and vehicles;
- Increased traffic on roads within and adjacent to the Project site;
- Waste generation associated with material packaging;
- Minor air quality impacts due to fugitive dust;
- Potential for soil erosion; and
- Potential disturbance to, and displacement of, some species of wildlife and associated habitat.²⁰⁴

188. Unavoidable adverse impacts associated with the operation would last as long as the life of the Project, and include:

- Introduction of additional industrial structures in an industrial area, which will be visible from local roadways and parcels;
- Operational noise if not properly mitigated with suppression;
- Changes in land cover and vegetation from previously disturbed grassland with scattered shrubs and small trees to an ESS facility (35 acres of permanent infrastructure). New tree plantings for screening and mitigation purposes will alleviate the proposed land use changes to more industrial land uses; and
- Creation of new impermeable surface for the ESS unit area, parking area, substation, and access roads.²⁰⁵

189. As discussed in detail above, the unavoidable impacts can be mitigated, and the DSP conditions will mitigate the unavoidable adverse impacts to the extent possible.

²⁰⁴ Ex. App.-1 at 129 (Application).

²⁰⁵ Ex. App.-1 at 129 (Application).

L. Irreversible and Irretrievable Commitments of Resources.

190. Minnesota law requires consideration of the irreversible and irretrievable commitments of resources that are necessary for the Project.²⁰⁶ Resource commitments are irreversible when it is impossible or very difficult to redirect that resource to a different future use; an irretrievable commitment of resources means the resource is not recoverable for later use by future generations.²⁰⁷

191. Irreversible and irretrievable resource commitments are primarily related to Project construction, including the use of water, aggregate, hydrocarbons, steel, concrete, wood, and other consumable resources. Some, like fossil fuel use, are irretrievable. Others, like water use, are irreversible. Still others might be recyclable in part, for example, the raw materials used to construct batteries and enclosures would be an irretrievable commitment of resources, excluding those materials that may be recycled at the end of useful life. The commitment of labor and fiscal resources to develop, construct, and operate the Project is considered irretrievable.²⁰⁸

192. The DSP addresses the irreversible and irretrievable commitments of resources with permit conditions, to the extent possible.²⁰⁹

M. Cumulative Impacts

193. Cumulative impacts are combined, incremental effects of human activity based on past, present, and future activities. While an individual activity may be insignificant by itself, minor impacts in combination with other actions may cause a larger issue in a region or to an important resource.²¹⁰

194. The Applicant searched for reasonably foreseeable projects in both temporal and spatial proximity to the Project. The EA identified two Minnesota Department of Transportation (MnDOT) road and maintenance projects that could reasonably be expected to increase traffic with worker and equipment transport travelling on similar routes. Xcel Energy will coordinate with appropriate parties on haul rout traffic volumes to reduce significant travel impacts in the area. Minor long-term cumulative impacts are anticipated.²¹¹

²⁰⁶ Minn. Stat. § 216L.05, subd. 11(b)(11).

²⁰⁷ Ex. App.-1 at 129 (Application).

²⁰⁸ Ex. App.-1 at 130 (Application).

²⁰⁹ See Ex. PUC EIP-1 at 11 and 19 (EIP Staff Recommendations on Draft Site Permit and Need for Environmental Assessment Addendum).

²¹⁰ Ex. App.-1 at 130 (Application).

²¹¹ Ex. App.-1 at 131 (Application).

XII. SITE PERMIT CONDITIONS

195. The DSP includes a number of proposed standard and special permit conditions, many of which have been discussed above. The conditions apply to site preparation, construction, cleanup, restoration, operation, maintenance, abandonment, decommissioning, and other aspects of the Project.

196. Based on the record, Special Condition 5.4's blanket prohibition on tree removal from June 1 to August 15 should be replaced with a condition requiring USFWS coordination regarding tree-clearing activities that may impact the NLEB. The record demonstrates there are no known NLEB maternity roost trees or hibernacula in Sherburne County, and the Project site contains only limited suitable forested habitat, primarily sparse conifers. The DSP already provides robust wildlife and vegetation protections—including Section 4.3.15's tree-removal minimization requirements, Special Condition 5.7's DNR-coordinated tree replacement plan, Special Condition 5.1's comprehensive VMP, and Section 4.3.30's wildlife-friendly erosion control requirements—rendering a rigid seasonal prohibition disproportionate and unnecessary. Accordingly, the record supports replacing Special Condition 5.4 with Xcel Energy's proposed USFWS coordination condition.

197. The following language will replace Special Condition 5.4:

The Permittee will coordinate with the U.S. Fish and Wildlife Service regarding the timing of tree-clearing and any other construction or restoration actions that may impact the Northern Long Eared Bat. The Permittee shall keep records of compliance with this section and provide them upon the request of Commission staff.

XIII. NOTICE

198. Minnesota statutes and rules require an applicant to provide certain notice to the public and local governments before and during the Application process.²¹² Xcel Energy provided notices to the public and local governments in satisfaction of Minnesota statutory and rule requirements.²¹³

199. Minnesota statutes and rules also require the Commission and EIP to provide certain notice to the public throughout the site permit application process.²¹⁴

²¹² Minn. Stat. § 216I.05, subd 5.

²¹³ Ex. App.-2 (Affidavit of Publication).

²¹⁴ Minn. Stat. § 216I.05, subd 7.

The Commission and EIP Staff provided the notices in satisfaction of Minnesota statutes and rules.²¹⁵

XIV. COMPLETENESS OF EA

200. ESS are eligible for the Standard Review process under Minn. Stat. § 216I.07, subd. 2 and, therefore, the Application must contain an EA with information on the proposed Project's human and environmental impacts and potential mitigation measures associated with the identified impacts.²¹⁶

201. The EA process is the alternative environmental review approved for ESS pursuant to the Standard Review Process.²¹⁷

202. The Commission is required to determine the completeness of the EA. An EA is complete if it addresses the requirements identified in Minn. Stat. § 216I.05, subd. 4.²¹⁸ On February 4, 2026, and following the January 13 and 14, 2026, public information and scoping meetings, Commission EIP Staff submitted a Scoping Summary and Recommendations, finding that an EA addendum is not required for the Project. The evidence in the record demonstrates that the EA is adequate.

203. The record further establishes that EA otherwise meets the criteria and contains information prescribed by Minn. Stat. §§ 216I.05, subd.4 and 216I.07, subd. 3.

CONCLUSIONS OF LAW

1. Any of the foregoing Findings of Fact more properly designated as Conclusions of Law are hereby adopted as such.

2. The Commission has jurisdiction over the Application for a site permit for the up to 600 MW proposed Project pursuant to Minn. Stat. §§ 216I.03, 216I.05 and 216I.07 (2025).

3. The Commission accepted the Application as complete on December 22, 2025.²¹⁹

²¹⁵ Affidavit of Publication (March 31, 2026) (eDocket No. [20263-229837-01](#)); Ex. PUC-12 (EQB Monitor Notice of Public Hearings and Availability of Draft Permit).

²¹⁶ Ex. App.-1 at 43 (Application).

²¹⁷ Minn. Stat. § 216I.07, subd. 3.

²¹⁸ See Minn. Stat. § 216I.05, subd 4; Ex. App.-1 (Appx. B).

²¹⁹ Ex. PUC-2 (Notice of Site Permit Application Completeness Determination and Public Information Meetings (Resubmitted to serve PPSA General List)).

4. The Applicant prepared an EA for the Project for the purposes of this proceeding, which satisfies the requirements of Minn. Stat. §§ 216I.05, subd. 4 and 216I.07, subd. 3.

5. The Commission appropriately concluded that no addendum to the EA should be prepared.

6. Xcel Energy and the Commission have substantially complied with the notice and procedural requirements of Minn. Stat. Ch. 216I (2025).

7. Public hearings were held on March 18, 2026 (in-person) and March 19, 2026 (remote-access).²²⁰ Proper notice of the public hearings was provided as required by §§ 216I.05, subd. 9, and 216I.07, subd. 4, and the public was given an opportunity to speak at the hearings and to submit written comments.²²¹

8. The Commission has the authority under Minn. Stat. § 216I.05, subd. 12 (2025) to place conditions in an ESS site permit.

9. The record in this proceeding demonstrates that Xcel Energy has satisfied the criteria for a Site Permit as set forth in Minn. Stat. § 216I.05 (2025) and all other applicable legal requirements.

10. The Project, with the permit conditions discussed above, satisfies the Site Permit criteria for an ESS in Minn. Stat. § 216I.05 (2025) and meets all other applicable legal requirements.

11. The Project, with the permit conditions discussed above, does not present a potential for significant adverse environmental effects pursuant to the Minnesota Environmental Rights Act and/or the Minnesota Environmental Policy Act.

12. Any of the foregoing conclusions of law which are more properly designated findings of fact are hereby adopted as such.

²²⁰ Beker Public Hearing on 3-18-2026 Transcript (April 3, 2026) (eDocket No. 20264-229991-01); Virtual Public Hearing on 3-19-2026 Transcript (April 3, 2026) (eDocket No. 20264-229991-02).

²²¹ Ex. PUC-11 (Notice of Public Hearings and Availability of Draft Permit).

In the Matter of the Application of
Northern States Power Company d/b/a
Xcel Energy for a Site Permit for the up
to 600 MW Sherco South & West Battery
Energy Storage Project in Sherburne
County, Minnesota

MPUC Docket No. E002/ESS-25-319
CAH Docket No. 24-2500-41543

CERTIFICATE OF SERVICE

Stephanie Mayers certifies that on the 6th day of April 2026, she e-filed a true and correct copy of the Response to Public Hearing Comments & Proposed Findings of Fact and Conclusions of Law on behalf of Xcel Energy via eDockets (www.edockets.state.mn.us):

Said document was also served on the Official Service Lists of record on file with the Minnesota Public Utilities Commission as attached hereto.

Executed on: April 6, 2026

Signed: /s/ Stephanie Mayers

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	25-319 Official CC Service List
2	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	25-319 Official CC Service List
3	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	25-319 Official CC Service List
4	Kristien	Butler	kristien.butler@state.mn.us		Office of Administrative Hearings	PO Box 64620 Saint Paul MN, 55164 United States	Electronic Service		Yes	25-319 Official CC Service List
5	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St, Louis MO, 63119-2044 United States	Electronic Service		No	25-319 Official CC Service List
6	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	25-319 Official CC Service List
7	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	25-319 Official CC Service List
8	Christopher	Droske	christopher.droske@minneapolismn.gov	Northern States Power Company dba Xcel Energy- Elec		661 5th Ave N Minneapolis MN, 55405 United States	Electronic Service		No	25-319 Official CC Service List
9	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	25-319 Official CC Service List
10	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	25-319 Official CC Service List
11	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	25-319 Official CC Service List
12	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	25-319 Official CC Service List
13	Frank	Hornstein	frank.hornstein@minneapolismn.gov	City of Minneapolis		350 South 5th Street Minneapolis MN, 55415 United States	Electronic Service		No	25-319 Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
14	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	25-319 Official CC Service List
15	Richard	Johnson	rickjohnson@cozen.com	Cozen O'Connor		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	25-319 Official CC Service List
16	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	25-319 Official CC Service List
17	Kavita	Maini	kmains@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	25-319 Official CC Service List
18	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	25-319 Official CC Service List
19	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	25-319 Official CC Service List
20	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	25-319 Official CC Service List
21	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	25-319 Official CC Service List
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	25-319 Official CC Service List
23	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	25-319 Official CC Service List
24	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	25-319 Official CC Service List
25	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	25-319 Official CC Service List
26	Carla	Vita	carla.vita@state.mn.us	MN DEED		Great Northern Building 12th Floor	Electronic Service		No	25-319 Official CC

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						180 East Fifth Street St. Paul MN, 55101 United States				Service List
27	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	25-319 Official CC Service List
28	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	25-319 Official CC Service List
29	Patrick	Zomer	pzomer@cozen.com	Cozen O'Connor		150 S. 5th Street, #1200 Minneapolis MN, 55402 United States	Electronic Service		No	25-319 Official CC Service List

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1	David	Bell	david.bell@state.mn.us		Department of Health	POB 64975 St. Paul MN, 55164 United States	Electronic Service		No	Agency Reps
2	Water Programs	Coordinator	waterprograms.bwsr@state.mn.us		Minnesota Board of Water and Soil Resources	520 Lafayette Road N St. Paul MN, 55155 United States	Electronic Service		No	Agency Reps
3	Kate	Fairman	kate.fairman@state.mn.us		Department of Natural Resources	Box 32 500 Lafayette Rd St. Paul MN, 55155-4032 United States	Electronic Service		No	Agency Reps
4	Chris	Green	chris.green@state.mn.us	Minnesota Pollution Control Agency		504 Fairgrounds Rd Suite 200 Marshall MN, 56258 United States	Electronic Service		No	Agency Reps
5	Dean	Hunter	dean.hunter@state.mn.us		Minnesota Department of Labor & Industry	443 Lafayette Rd N St. Paul MN, 55155-4341 United States	Electronic Service		No	Agency Reps
6	Chad	Konickson	chad.konickson@usace.army.mil	U.S.Army Corps of Engineers		332 Minnesota St. Suite E1500 Saint Paul MN, 55101 United States	Electronic Service		No	Agency Reps
7	Stacy	Kotch Egstad	stacy.kotch@state.mn.us		MINNESOTA DEPARTMENT OF TRANSPORTATION	395 John Ireland Blvd. St. Paul MN, 55155 United States	Electronic Service		No	Agency Reps
8	General	Mail	twincities@fws.gov				Electronic Service		No	Agency Reps
9	Stephan	Roos	stephan.roos@state.mn.us		Minnesota Department of Agriculture	625 Robert St N Saint Paul MN, 55155-2538 United States	Electronic Service		No	Agency Reps
10	Jayme	Trusty	execdir@swrdc.org	SWRDC		2401 Broadway Ave #1 Slayton MN, 56172 United States	Electronic Service		No	Agency Reps
11	Isaac	Weston	isaac.weston@state.mn.us			null null, null United States	Electronic Service		No	Agency Reps
12	Alan	Whipple	sa.property@state.mn.us		Minnesota Department Of Revenue	Property Tax Division 600 N. Robert Street St. Paul MN, 55146-3340 United States	Electronic Service		No	Agency Reps
13	Jonathan	Wolfgram	jonathan.wolfgram@state.mn.us		Office of Pipeline Safety	445 Minnesota St Ste 147 Woodbury MN, 55125 United States	Electronic Service		No	Agency Reps

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Steve	Albrecht	steve.albrecht@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	Tribal Government Contacts
2	Kelly	Applegate	kelly.applegate@millelacsband.com			null null, null United States	Electronic Service		No	Tribal Government Contacts
3	Agatha	Armstrong	agathaa@grandportage.com	Grand Portage Bank of Lake Superior Chippewa		PO BOX42 Grand Portage MN, 55605 United States	Electronic Service		No	Tribal Government Contacts
4	Carolyn	Beaulieu	carolyn.beaulieu@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	Tribal Government Contacts
5	Brad	Blacketter	bradblacketter@fdlband.org			1720 Big Lake Rd Cloquet MN, null United States	Electronic Service		No	Tribal Government Contacts
6	Sheldon	Boyd	sheldon.boyd@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	Tribal Government Contacts
7	Drew	Brockman	dbrockman@uppersiouxcommunity-nsn.gov	Upper Sioux Community			Electronic Service		No	Tribal Government Contacts
8	Scott	Buchanan	scottbuchanan@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	Tribal Government Contacts
9	Perry	Bunting	perry.bunting@millelacsband.com				Electronic Service		No	Tribal Government Contacts
10	Constance	Campbell	tori.campbell@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	Tribal Government Contacts
11	Mike	Chosa	mike.chosa@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	Tribal Government Contacts
12	Chase	Christopher	chase.christopherson@state.mn.us				Electronic Service		No	Tribal Government Contacts
13	Harry	Davis	harry.davis@millelacsband.com	Mille Lacs Band of Ojibwe		null null, null United States	Electronic Service		No	Tribal Government Contacts
14	Jason	Defoe	jasondefoe@redlakenation.org	Red Lake Nation		null null, null United States	Electronic Service		No	Tribal Government Contacts
15	Bobby	Deschampe	robertdeschampe@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	Tribal Government Contacts
16	Tamara	Desjarlais	desjarlais.tamara@lowersioux.com				Electronic Service		No	Tribal Government

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										Contacts
17	Deb	Dirlam	deb.dirlam@lowersioux.com	Lower Sioux Indian Community		PO Box 308 39527 Reservation Highway 1 Morton MN, 56270 United States	Electronic Service		No	Tribal Government Contacts
18	Amy	Drift	amy.mason@boisforte-nsn.gov	Bois Forte Band of Chippewa		5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	Tribal Government Contacts
19	Perry	Drift	pdrift@boisforte-nsn.gov	Bois Forte Band of Chippewa		5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	Tribal Government Contacts
20	Shane	Drift	sdrift@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	Tribal Government Contacts
21	Caleb	Dunlap	calebdunlap@fdlband.org	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	Tribal Government Contacts
22	Wally	Dupuis	wallydupuis@fdlband.org	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	Tribal Government Contacts
23	Wayne	Dupuis	waynedupuis@fdlband.org	Fond du Lac Band of Lake Superior Chippewa			Electronic Service		No	Tribal Government Contacts
24	Jamie	Edwards	jamie.edwards@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56358 United States	Electronic Service		No	Tribal Government Contacts
25	Laura	Erickson	laura.erickson@whiteearth-nsn.gov	White Earth Nation		null null, null United States	Electronic Service		No	Tribal Government Contacts
26	Kyle	Fairbanks	kyle.fairbanks@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	Tribal Government Contacts
27	Michael	Fairbanks	michael.fairbanks@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	Tribal Government Contacts
28	Leonard	Fineday	leonard.fineday@llojibwe.net	Leech Lake Bank of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	Tribal Government Contacts
29	Henry	Fox	henry.fox@whiteearth-nsn.gov	White Earth Nation		PO Box 418 White Earth MN, 56569 United States	Electronic Service		No	Tribal Government Contacts
30	Tara	Geshick	tara.geshick@boisforte-nsn.gov				Electronic Service		No	Tribal Government Contacts

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
31	Jeneal	Goggleye	jgoggleye@boisforte-nsn.gov				Electronic Service		No	Tribal Government Contacts
32	Jeremy	Hamilton	jhamilton@uppersiouxcommunity-nsn.gov	Upper Sioux Community		Upper Sioux Community PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	Tribal Government Contacts
33	Christie	Haverkamp	christie.haverkamp@whiteearth-nsn.gov	White Earth Nation		PO Box 418 White Earth MN, 56569 United States	Electronic Service		No	Tribal Government Contacts
34	Carlos	Hernandez	carloshernandez@boisforte-nsn.gov	Bois Forte Band of Chippewa			Electronic Service		No	Tribal Government Contacts
35	Faron	Jackson, Sr.	faron.jackson@llojibwe.net			190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	Tribal Government Contacts
36	Kevin	Jensvold	kevinj@uppersiouxcommunity-nsn.gov	Upper Sioux Community		PO Box 147 Granite Falls MN, 56241-0147 United States	Electronic Service		No	Tribal Government Contacts
37	Blake	Johnson	blake.johnson@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	Tribal Government Contacts
38	Grant	Johnson	grant.johnson@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	Tribal Government Contacts
39	Ronald	Johnson	ron.johnson@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	Tribal Government Contacts
40	Susan	Klapel	susan.klapel@millelacsband.com				Electronic Service		No	Tribal Government Contacts
41	Mike	Laroque	mike.laroque@whiteearth-nsn.gov	White Earth Nation		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	Tribal Government Contacts
42	Miranda	Lilya	mlilya@boisforte-nsn.gov	Bois Forte Band of Chippewa		5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	Tribal Government Contacts
43	Charles	Lippert	charlie.lippert@millelacsband.com			43408 Oodena Dr Onamia MN, 56359 United States	Electronic Service		No	Tribal Government Contacts
44	Vernelle	Lussier	vernelle.lussier@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	Tribal Government Contacts

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45	Nate	Mathews	nathan.mathews@whiteearth-nsn.gov	White Earth Nation		PO Box 418 White Earth MN, 56569 United States	Electronic Service		No	Tribal Government Contacts
46	Jacob	McArthur	jacob.mcarthur@whiteearth-nsn.gov	White Earth Nation		PO Box 418 White Earth MN, 56569 United States	Electronic Service		No	Tribal Government Contacts
47	April	McCormick	aprilm@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	Tribal Government Contacts
48	Wendy	Merrill	wendy.merrill@millelacsband.com	Mille Lacs Band of Ojibwe		null null, null United States	Electronic Service		No	Tribal Government Contacts
49	Valentina	Mgeni	valentina.mgeni@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	Tribal Government Contacts
50	Cole W.	Miller	cole.miller@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	Tribal Government Contacts
51	Robert	Moyer, Jr.	rmoyer@boisforte-nsn.gov	Bois Forte Band of Chippewa Tribal Government		5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	Tribal Government Contacts
52	Sonny	Myers	smyers@1854treatyauthority.org	1854 Treaty Authority		4428 Haines Rd Duluth MN, 55811-1524 United States	Electronic Service		No	Tribal Government Contacts
53	Joseph	OBrien	joey.obrien@lowersioux.com			39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	Tribal Government Contacts
54	Samantha	Odegard	samanthao@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane Granite Falls MN, 56241 United States	Electronic Service		No	Tribal Government Contacts
55	Earl	Otis	earlotis@fdlband.org	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	Tribal Government Contacts
56	Joe	Plumer	joe.plumer@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	Tribal Government Contacts
57	Robert	Prescott	bob.prescott@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	Tribal Government Contacts
58	Tyler	Prescott	tyler.prescott@lowersioux.com	Lower Sioux Indian Community		PO Box 308 39527 Reservation Highway 1 Morton MN,	Electronic Service		No	Tribal Government Contacts

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73	Toby	Stephens	tobys@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO BOX 428 Grand Portage MN, 55605 United States	Electronic Service		No	Tribal Government Contacts
74	Samuel	Strong	sam.strong@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	Tribal Government Contacts
75	Craig	Tangren	craig.tangren@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	Tribal Government Contacts
76	Camille	Tanhoff	kamip@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO BOX 147 Granite Falls MN, 56241 United States	Electronic Service		No	Tribal Government Contacts
77	George	Taylor, Jr.	joey.taylor@piic.org				Electronic Service		No	Tribal Government Contacts
78	Bill	Thompson	billthompson@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	Tribal Government Contacts
79	Brandy	Tofte	brandy.toft@llojibwe.net	Leech Lake Bank of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	Tribal Government Contacts
80	Caralyn	Trutna	carrie@uppersiouxcommunity-nsn.gov	Upper Sioux Community		Upper Sioux Community P.O. Box 147 Granite Falls MN, 55372 United States	Electronic Service		No	Tribal Government Contacts
81	Heather	Westra	heather.westra@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	Tribal Government Contacts
82	Steve	White	steve.white@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	Tribal Government Contacts
83	Virgil	Wind	virgil.wind@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	Tribal Government Contacts
84	Krishna	Woerheide	kwoerheide@grandportage.com	Grand Portage Bank of Lake Superior Chippewa		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	Tribal Government Contacts
85	Laurie	York	laurie.york@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	Tribal Government Contacts
86	Ian	Young	ianyoun@fdlband.org	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	Tribal Government Contacts