

May 12, 2026

Ellen Heine
Xcel Energy
414 Nicollet Mall – 6th Floor
Minneapolis, MN 55401

RE: Application Completeness Determination
Skyway 345 kV Transmission Line Project – Route Permit Application
Docket No. E002/TL-26-135

Dear Ms. Heine,

On April 28, 2026, Northern States Power Company, d/b/a Xcel Energy and Echo Zone LLC, a subsidiary of Google LLC (applicants), filed a route permit application with the Minnesota Public Utilities Commission (Commission) for the Skyway 345 kV Transmission Line Project (project). As required by Minnesota Statute § 216I.05, subd. 7, the Commission must determine whether an application is complete and advise applicants of any deficiencies within ten working days of the date an application is received.

On February 18, 2026, Xcel Energy provided Commission Energy Infrastructure Permitting (EIP) staff with a draft of the route permit application for preapplication review as required in Minnesota Statute § 216I.05, subd. 6. EIP staff responded to the applicants on March 27, 2026, with recommendations focused on completeness and clarifications that may assist in the Commission's review of the application.

The Commission may accept an application as complete, reject an application, or accept an application as complete if missing information is not essential to provide adequate notice and may be obtained from the applicant prior to the initial public meeting.¹

Commission EIP staff have reviewed the filed application for consistency with Minnesota Statute §216I.05. Staff concludes that the route application filed on April 28, 2026, largely satisfies the application content requirements of Minnesota Statute § 216I.05, but requests that the applicants make a supplemental filing no later than the public meeting, that includes documentation of follow-up phone calls with the Tribal Historic Preservation Offices from the tribes that have not responded to previous e-mails.²

¹ Minnesota Statute §216I.05, subd. 7

² Id.

May 12, 2026

Based on review of the submissions filed in this matter, Commission EIP staff have advised me, and I agree, that the route permit application submitted by the applicant is sufficiently complete in accordance with Minnesota Statute § 216I.05 to proceed with the public information meeting.

Please contact the EIP project managers, Sam Weaver at sam.weaver@state.mn.us, 651-539-1531 or Saarah Maxon at saarah.maxon@state.mn.us, 651-201-2200, if you have questions or would like to discuss further.

Sincerely,

A handwritten signature in blue ink, appearing to read "Sasha Bergman".

Sasha Bergman
Executive Secretary

APPLICATION COMPLETENESS FILING REVIEW

Skyway 345 kV Transmission Line Project

DOCKET NO. E002/TL-26-135

On April 28, 2026, Northern States Power Company, d/b/a Xcel Energy and Echo Zone LLC, a subsidiary of Google LLC (Google) (together the applicants), filed a route permit application for the Skyway 345 kV transmission line project with the Minnesota Public Utilities Commission (Commission). As required by Minnesota Statute § 216I.05, subd. 7, the Commission must determine whether an application is complete and advise applicants of any deficiencies within ten working days of the date an application is received.

This application completeness review addresses the completeness of the route permit application.

Documents Attached:

- (1) Figure 1. Project Overview Map
- (2) Table 1. Application Completeness Requirements

Introduction and Background

On April 28, 2026, Northern States Power Company, d/b/a Xcel Energy (Xcel Energy) and Echo Zone LLC, filed a route permit application to construct and operate the Skyway project, a 1.2 mile 345 kV transmission line and four new substations near Pine Island in Goodhue County, Minnesota (project).³

Project Purpose

The project is needed to provide transmission capacity to serve Project Skyway, which is proposed to host a proposed data center among other facilities.⁴

Project Description

The applicants propose constructing a new 1.2-mile 345 kV double-circuit transmission line between the existing North Rochester substation and four new substations near the data center (Figure 1, attached). Xcel plans to expand the North Rochester substation to facilitate the new 345 kV transmission lines. Xcel Energy will own and operate the transmission lines and expanded substation, and Google will own and operate the four new substations for Project Skyway. The applicants seek 150 feet of right-of-way within

³ Xcel Energy and Google, *Application for a Route Permit for the Skyway 345 kV Transmission Line Project in Goodhue County, Minnesota*, April 28, 2026, eDockets Number [20264-231087-02](#) (herein after Route Permit Application or RPA). The filing also included a cover letter [20264-231087-01](#); and appendices [20264-231087-03](#), [20264-231087-04](#) (non-public), and [20264-231087-05](#).

⁴ RPA, p. 5 and 115.

a route width ranging from 500 feet from the proposed alignment to 1,000 feet around the proposed substation expansion. The poles utilized for the project will be steel monopole structures (likely self-weathering), 100 to 180 feet tall, and placed 150 to 975 feet apart. The applicants anticipate construction to begin in the spring of 2027 with an in-service date of winter 2029.

Regulatory Process and Procedures

In Minnesota, no person may construct a high voltage transmission line without a route permit issued by the Commission.⁵ Because the proposed project is designed for and capable of operating at a nominal voltage of 345 kV and is 1.2-miles long, it meets the statutory definition of a high voltage transmission line under the Minnesota Energy Infrastructure Permitting Act and therefore requires a route permit from the Commission.⁶ Because the project is a high voltage transmission line with a capacity over 300 kV and less than 30 miles in length, the route permit application qualifies for Commission review under the standard review process described in Minnesota Statute §216I.07.

The project does not require a certificate of need from the Commission because it is being built to distribute service to a single customer at a single location in accordance with Minn. Stat. § 216B.243, subd. 8(2).

Route Permit Application

Route permit applications for large electric power facilities must provide information about the project such as project ownership, a description of the project and associated facilities, environmental information, and maps.⁷ **Table 1** provides a comprehensive list of information required by statute. Under the standard review process, applicants are not required to propose alternative routes in their permit application. However, if applicants have evaluated and rejected alternative routes, they must describe these rejected alternatives and the reasons for rejecting them in their application.⁸

The Commission must determine whether an application is complete and advise the applicant of any deficiencies within ten working days of the date the application is received.⁹ The Commission may accept an application as complete, if the required information is provided or if the additional necessary information is not essential to provide adequate notice and may be obtained from the applicant prior to the initial public meeting.¹⁰ The permitting process begins when the Commission determines that a permit application is complete; the Commission has six months (or nine months, with just cause) from the date of this determination to reach a permit decision.¹¹

The route permit application must contain an environmental assessment (EA) prepared by the applicant. An EA is a document which describes the potential human and environmental impacts of a proposed project and possible mitigation measures. An EA is the only state environmental review document that

⁵ Minnesota Statute 216I.05, subd. 2

⁶ Minnesota Statute §216I.02, subd. 8

⁷ Minnesota Statute §216I.05, subd. 3

⁸ Minnesota Statute §216I.05, subd. 3 (14)

⁹ Minnesota Statute §216I.05, subd. 7

¹⁰ Ibid.

¹¹ Minnesota Statute §216I.07, subd. 5

must be prepared for the proposed project under the standard review process.¹² Minnesota Statute Chapter 216I.05, subd. 4 outlines the environmental information required in the EA.¹³

Public Information Meeting and Comment Period

Following a determination of whether the application is complete, the Commission must hold at least one public meeting near the proposed project location to explain the permitting process, present major issues, accept public comments on the need for and scope of an addendum to the EA and respond to questions raised by the public. In practice, the Commission holds a remote access meeting in addition to the public meeting near the proposed project. Written comments must be accepted for no less than 10 days after the date of the last public meeting and the Commission must accept comments on potential impacts, alternative routes to be considered, and permit conditions.¹⁴

Draft Permit and EA Addendum

Following the close of the public comment period, the Commission must prepare a draft route permit including proposed permit conditions. The draft permit does not authorize a person to construct the project.¹⁵

The Commission must also determine whether an addendum to the EA is required and, if an addendum is required, must identify the scope of the addendum.¹⁶ The Commission must prepare an addendum if the Commission identifies other routes or potential impacts for review following the public information meeting and associated comment period.¹⁷

Public Hearing

The Commission must hold a public hearing in the area where the project is proposed after a draft permit is issued, and any EA addendum if prepared.¹⁸ The public may provide comments on the application, including the EA and any EA addendum developed at the public hearing and during the associated written comment period under Minnesota Statute 216I.07, subd. 4.¹⁹

The Commission may request that an Administrative Law Judge (ALJ) from the Court of Administrative Hearings preside over the hearing.²⁰ An ALJ may provide either a summary of public testimony or a full report with findings of fact, conclusions of law, and recommendations regarding the project.

¹² Minnesota Statute §216I.07, subd. 3

¹³ Minnesota Statute §216I.05, subd. 4

¹⁴ Minnesota Statute §216I.05, subd. 9

¹⁵ Minnesota Statute §216I.05, subd. 10(1)

¹⁶ Minnesota Statute §216I.05, subd. 10(2)

¹⁷ Minnesota Statute 216I.07, subd. 3 (b).

¹⁸ Minnesota Statute 216I.07, subd. 4.

¹⁹ Minnesota Statute 216I.07, subd. 4.

²⁰ Id.

Staff Review

Staff recommend the Commission find the application complete but require that the applicants make a supplemental filing no later than the public meeting that includes documentation of follow-up phone calls with the Tribal Historic Preservation Offices from the tribes that have not responded to previous outreach efforts.

Application Completeness

On February 18, 2026, Xcel Energy provided Commission staff with a draft of the route permit application for preapplication review as required in Minnesota Statute § 216I.05, subd. 6. EIP staff responded to the applicant with recommendations focused on completeness and clarifications that may assist in the Commission's review of the application on March 27, 2026. The applicants summarized their responses to EIP comments in Appendix D of the route permit application.

Staff have reviewed the application and believe that its comments on the draft application and supporting materials were generally addressed in the application filed on April 28, 2026. Staff recommends that applicants make a supplemental filing no later than the public meeting that includes documentation of follow-up phone calls with the Tribal Historic Preservation Offices from the tribes that have not responded to previous letters.

EIP Staff Recommendations

Staff recommend that:

- The Commission find the application sufficiently complete in accordance with Minnesota Statute §216I.05 to proceed with the public information meeting.
- The Commission require the applicants make a supplemental filing no later than the public meeting that includes documentation of follow-up phone calls with the Tribal Historic Preservation Offices from the tribes that have not responded to previous letters.

Figure 1. Skyway 345 kV Transmission Line Project – Overview Map

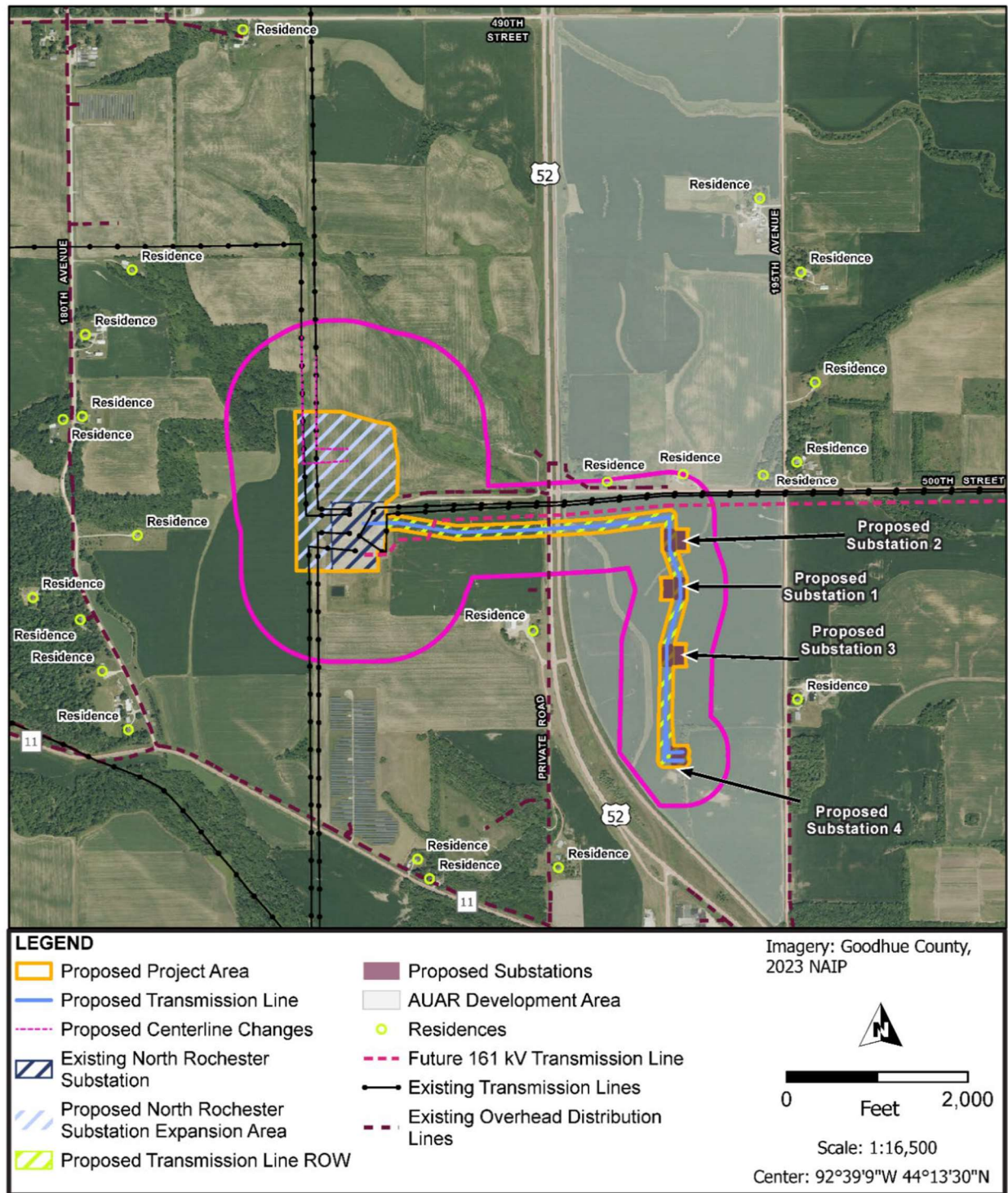


Table 1. Application Completeness Requirements

Topic	Statutory Requirement	Location in Document
Project ownership	216I.05, subd. 3(b)(1)	1.2
Meets staff expectations. The project will be jointly owned by Northern States Power Company, d/b/a Xcel Energy and Echo Zone LLC, a subsidiary of Google LLC.		
Permittee name	216I.05, subd. 3(b)(2)	1.3
Meets staff expectations. Xcel Energy and Echo Zone will be the permittee.		
Project description	216I.05, subd. 3(b)(3)	Section 2
Meets staff expectations. Applicants incorporated EIP staff recommendations for additional details regarding route width.		
Environmental information, generally	216I.05, subd. 3(b)(4) and subd. 4(a)	Section 6
See resource-specific discussions.		
Identification of Property Owners	216I.05, subd. 3(b)(5), as described in 216I.05, subd. 8 (3)	Appendix E
Meets staff expectations; Appendix E provides a list of landowners.		
Maps	216I.05, subd. 3(b)(6)	Appendix B
Meets staff expectations.		
Existing ROWs	216I.05, subd. 3(b)(7)	2.2.2
Meets staff expectations. Applicants incorporated EIP staff recommendations of including existing ROWs in section 2.2.2.		
Project design, including required ancillary facilities	216I.05, subd. 3(b)(8)	2.2, 2.3, and 2.4
Meets staff expectations.		

Topic	Statutory Requirement	Location in Document
Project cost	216I.05, subd. 3(b)(9)	Table 3.1-1
Meets staff expectations.		
Design for expansion	216I.05, subd. 3(b)(10)	2.5
Meets staff expectations.		
Site or ROW acquisition, construction, maintenance, & restoration	216I.05, subd. 3(b)(11)	Section 2
Meets staff expectations. Applicants addressed comments from staff and included more information on land acquisition status and operation procedures.		
Other Permits	216I.05, subd. 3(b)(12)	Section 4
Meets staff expectations.		
Certificate of Need Requirement	216I.05, subd. 3(b)(13)	1.5.1
Meets staff expectations; a certificate of need is not required for the project.		
Other sites or routes considered	216I.05, subd. 3(b)(14)	Section 5
Meets staff expectations.		
Additional information required by rule	216I.05, subd. 3(b)(15)	2.2.1
Meets staff expectations. Applicants provided information clarifying that the project avoids the prohibited routes identified in Minn. R. 7850.4300.		
Tribal coordination	216I.05, subd. 3(b)(16)	Section 7 and Appendix C
The applicants followed up with all tribes that have yet to be reached with an additional letter. The log of communication is listed in Section 7 and Appendix C. The applicants state they will follow-up with phone calls to any non-responding tribe. Staff requests this correspondence to be filed by the first public meeting.		

Topic	Statutory Requirement	Location in Document
Preapplication Coordination (LGUs)	216I.05, subd. 5 (1)	Section 7 and Appendix C
Meets staff expectations. Local Governmental Units were properly notified on November 6, 2026, via email as documented in Section 7 and Appendix C.		
Preapplication Coordination (State Technical Resource Agencies)	216I.05, subd. 5 (3)	Section 7 and Appendix C
Meets staff expectations. State agencies were properly notified on November 6, 2026, via email as documented in Section 7 and Appendix C.		
Environmental setting	216I.05, subd. 4(a)(1)	6.3
Meets staff expectations. Applicants provided more information on the environmental setting.		
Human settlement, generally	216I.05, subd. 4(2)	6.4
See resource-specific discussions.		
Aesthetics	216I.05, subd. 4(a)(2)	6.4.1
Meets staff expectations. Applicants have modified this section from the proposed draft to clarify potential impacts and mitigation measures.		
Cultural Values	216I.05, bud. 4(a)(2)	6.4.2
Meets staff expectations.		
Displacement	216I.05, subd. 4(a)(2)	6.4.3
Meets staff expectations.		
Environmental Justice Impacts	216I.05, subd. 4(a)(2); 216I.05, subd. 11(a)(3)	6.4.4
Meets staff expectations. The project is not located in an a statutorily defined environmental justice area.		
Land Use and Zoning	216I.05, subd. 11(a) (2)	6.4.8
Meets staff expectations. Applicants have modified this section from the proposed draft to clarify potential impacts and mitigation measures.		

Topic	Statutory Requirement	Location in Document
Noise	216I.05, subd. 4(a)(2)	6.4.6
Meets staff expectations. Applicants have modified this section from the proposed draft to clarify potential impacts and mitigation measures.		
Public Services and Transportation	216I.05, subd. 4(a)(2)	6.4.7
Meets staff expectations. Applicants have modified this section from the proposed draft to clarify potential impacts and mitigation measures.		
Recreation	216I.05, subd. 4(a)(2)	6.4.9
Meets staff expectations. Applicants have modified this section from the proposed draft to clarify potential impacts and mitigation measures.		
Socioeconomic Impacts	216I.05, subd. 4(a)(2); 216I.05, subd. 11(b)(14)	6.4.10
Meets staff expectations. Applicants have modified this section from the proposed draft to clarify potential impacts and mitigation measures.		
Property Values	216I.05, subd. 4(a)(2); 216I.05, subd. 11(b)(14)	6.4.11
Meets staff expectations. While impacts to the value of individual properties are influenced by a complex interaction of factors and cannot be predicted, applicants have added information summarizing studies on potential impacts to property values from transmission lines and provided a discussion of mitigation measures.		
Public health & safety including EMF	216I.05, subd. 11(b)(1) (Decision Criteria)	6.4.5
Meets staff expectations. Applicants have modified this section to include a table of common EMF sources.		
Land-based economics, generally	216I.05, subd. 4(a)(3)	6.5
See resource-specific discussions.		
Agriculture	216I.05, subd. 4(3); 216I.05, subd. 11(b)(5) and (9); see also Minn. R. 7850.4400, subp. 4.	6.5.1
Meets staff expectations.		

Topic	Statutory Requirement	Location in Document
Forestry	216I.05, subd. 4(3)	6.5.2
Meets staff expectations. The project will not impact commercial forestry operations.		
Mining	216I.05, subd. 4(a)(3)	6.5.3
Meets staff expectations. The project will not impact mining operations.		
Tourism	216I.05, subd. 4(a)(3)	6.5.4
Meets staff expectations. The project is not expected to impact tourism resources.		
Archaeological & historic resources	216I.05, subd. 4(4)	6.6 and Appendix H
Meets staff expectations. Applicants have modified this section from the proposed draft to include archaeological survey information, as well as include MIAC in the Unanticipated Discoveries Plan.		
Natural environment impacts - generally	216I.05, subd. 4(5)	6.7
See resource-specific discussions.		
Air quality	216I.05, subd. 4(a)(5)	6.7.1
Meets staff expectations.		
Geology and Groundwater	216I.05, subd. 4(a)(5); 216I.05, subd. 11(b)(1)	6.7.2
Meets staff expectations.		
Soils	216I.05, subd. 11(b)(1) and subd. 11(b)(5)	6.7.3
Meets staff expectations.		
Surface waters (including stormwater, floodplains, and wetlands)	216I.05, subd. 4(5); 216I.05, subd. 11(b)(1)	6.7.4
Meets staff expectations. Applicants have provided more information on wetland delineations in section 6.7.4.2.		

Topic	Statutory Requirement	Location in Document
Vegetation	216I.05, subd. 4(5)	6.7.5
Meets staff expectations.		
Wildlife	216I.05, subd. 4(5)	6.7.6
Meets staff expectations.		
Rare and unique resources	subd. 4(8)	6.7.7
Meets staff expectations. Applicants have provided review documentation for natural and cultural resources in Appendices H and I.		
Greenhouse gases	216I.05, subd. 4(6)	6.7.8
Meets staff expectations.		
Climate change resilience	216I.05, subd. 4(7)	6.7.9
Meets staff expectations. Applicants have modified this section from the proposed draft to clarify potential impacts and mitigation measures.		
Unavoidable Impacts	216I.05, subd. 4(9)	6.8
Meets staff expectations.		
Irretrievable and Irreversible Impacts	216I.05, subd. 11(b)(11)	6.9
Meets staff expectations.		
Cumulative Potential Effects	216I.05, subd. 11(a)(2) and (b)(2)	6.10
Meets staff expectations.		
Mitigation Measures	216I.05, subd. 4(10)	Section 6
See resource-specific discussions. Mitigation measures were added throughout the various resource sections.		