



414 Nicollet Mall  
Minneapolis, MN 55401

September 15, 2023

—Via Electronic Filing—

Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
350 Metro Square Building  
121 Seventh Place East  
St. Paul, MN 55101

RE: REPLY COMMENTS – COMPLETENESS  
CERTIFICATE OF NEED FOR THE PROPOSED 345 kV BROOKINGS COUNTY –  
LYON COUNTY AND HELENA – HAMPTON SECOND-CIRCUIT PROJECT  
DOCKET NO. E002/CN-23-200

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits these Reply Comments pursuant to the Minnesota Public Utilities Commission’s Notice of Extended Comment Period issued September 1, 2023, in the above-noted docket. Xcel Energy submits these Reply Comments as the lead utility for itself and on behalf of the other CapX2020 Brookings Owners<sup>1</sup> as co-Applicants.

### **Reply Comments**

Comments were filed on August 31, 2023 by the Department of Commerce, Energy Environmental Review and Analysis (DOC-EERA) staff and on September 6, 2023 by the Department of Commerce, Division of Energy Resources (DOC-DER).

Regarding completeness, the DOC-DER recommended the Commission determine that the Certificate of Need Application (CN Application) for the proposed 345 kilovolt Brookings County – Lyon County and Helena – Hampton Second-Circuit Project (Brookings Second-Circuit Project) is complete. The DOC-EERA acknowledged

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<sup>1</sup> In addition to Xcel Energy, the “CapX2020 Brookings Owners” or “Owners” are Central Minnesota Municipal Power Agency, Great River Energy, Otter Tail Power Company, and Western Minnesota Municipal Power Agency.

that the CN Application contains the environmental information required by applicable rules.<sup>2</sup>

Concerning process, the DOC-DER recommended that the Commission use the informal process for evaluating the CN Application, as it is unlikely to significantly impact land use or landowners more than the existing transmission facilities. The DOC-EERA acknowledged Xcel Energy and the co-Applicants' plans to request a minor alteration to the existing Brookings – Hampton route permit<sup>3</sup> and anticipates reviewing it concurrently with the CN Application and making its recommendation after release of the Environmental Report for the Certificate of Need.

Finally, the DOC-DER does not oppose the variance request to Minn. R. 7849.0200, subp. 2, to waive the requirement for filing 13 copies of Certificate of Need applications with the Commission.

We appreciate the agencies' thorough review of the CN Application and agree with their recommendations. Xcel Energy, on behalf of itself and the co-Applicants, respectfully requests that the Commission determine that the CN Application is complete and grant the variance request. Further, because there are no contested issues of material fact with respect to the CN Application, Xcel Energy and the co-Applicants request that the Commission approve the use of the informal process as recommended by the DOC-DER.

Please contact me on behalf of Xcel Energy and the co-Applicants at (214) 422-3672 or [monsherra.s.blank@xcelenergy.com](mailto:monsherra.s.blank@xcelenergy.com) if you have any questions regarding this filing.

Sincerely,

*/s/ Monsherra S. Blank*

MONSHERRA S. BLANK  
DIRECTOR, REGULATORY AND STRATEGIC ANALYSIS

Encl  
c: Service List

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<sup>2</sup> See Minn. R. 7849.0310, 7849.0330, and 7849.0340.

<sup>3</sup> Docket No. ET2/TL-08-1474.

## CERTIFICATE OF SERVICE

I, Ella Giefer, hereby certify that I have this day served copies or summaries of the foregoing documents on the attached list(s) of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States Mail at Minneapolis, Minnesota

or

xx electronic filing

**Docket No. E002/CN-23-200**

Dated this 15th day of September 2023

/s/

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Ella Giefer  
Regulatory Administrator

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Sarah	Beimers	sarah.beimers@state.mn.us	Department of Administration - State Historic Preservation Office	50 Sherburne Avenue Suite 203 St. Paul, MN 55155	Electronic Service	No	OFF_SL_23-200_CN-23-200
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Brian	Bell	bell.brian@dorsey.com	Dorsey & Whitney LLP	50 South Sixth St. Suite 1500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-200_CN-23-200
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_23-200_CN-23-200
Randall	Doneen	randall.doneen@state.mn.us	Department of Natural Resources	500 Lafayette Rd, PO Box 25  Saint Paul, MN 55155	Electronic Service	No	OFF_SL_23-200_CN-23-200
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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_23-200_CN-23-200
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