



414 Nicollet Mall
Minneapolis, MN 55401

January 14, 2020

Mr. Ryan Barlow
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

—Via Electronic Filing—

Re: LATE FILED REPLY COMMENTS
REQUEST FOR A MINOR ALTERATION OF THE XCEL ENERGY 500 kV
TRANSMISSION LINE 5702 NEAR CHISHOLM, MN

DOCKET NO. E002/MC-19-758

Dear Mr. Barlow:

On November 27, 2019, Northern States Power Company (doing business as Xcel Energy,) a Minnesota Corporation, filed a request with the Minnesota Public Utilities Commission (Commission) for a Minor Alteration of its existing 500kV transmission line in Chisholm, Minnesota. The Minor Alteration is a 3-mile re-route of existing Line #5702 to allow expansion of the Hibbing Taconite (HibTac) mine.

Commission staff published Notice of the request online and sent direct mail to all nearby landowners, and local, state, and federal government officials with jurisdiction over land and resources within the project area. Public comments were accepted through December 23, 2019.

During the public comment period, three comment letters were received. The Minnesota Department of Commerce Energy Environmental Review and Analysis Unit (DOC-EERA) described its review of the human and environmental impacts of the proposed project, and recommended Commission approval of the Minor Alteration request, with associated conditions. The Minnesota Department of Transportation filed comments related to permitting and traffic control coordination efforts. Lastly, Global Minerals Engineering, an engineering company representing mineral rights owners along the project, filed comments supportive of the project,

requesting affected land and mineral owners be notified and requesting conditions on land rights being obtained for the project.

Xcel Energy appreciates the opportunity to respond in support of these comments and to provide additional information regarding our request for a Minor Alteration.

REPLY COMMENTS

DOC-EERA Comments

Xcel Energy concurs with DOC-EERA's assessment that the proposed Minor Alteration does not result in significant changes to the human and environmental impacts of the existing facility, per Minn. Rule 7850.4100, and appreciates its recommendation to the Commission that the Minor Alteration be approved.

In its comments, DOC-EERA recommends the Commission impose conditions on the authorization of the Minor Alteration request. Xcel Energy finds these conditions to be reasonable and can and will comply with each of the conditions, should the Commission choose to adopt them.

Department of Transportation

The proposed route of the project would cross Highway 169. Xcel Energy has reviewed the crossing location and angle with DOT representatives and appreciates the DOT's acknowledgement that the crossing appears to be permissible. Xcel will continue to work with the DOT to obtain a permit and coordinate any necessary traffic control.

Global Minerals

Global Minerals represents several owners of mineral rights along the proposed route and has been active in the stakeholder process the Company undertook in evaluating this Minor Alteration. Xcel Energy appreciates Global Minerals comments in favor of the proposed re-route. Xcel Energy agrees with Global Minerals comments requiring notification of land, mineral and stockpile owners and has in-fact already contacted all of these parties.

In its third point, Global Minerals states that no more than 4 years be allowed to require movement of the transmission line and that the line shall not prevent access across the approved route. This comment relates to conditions on land rights. These conditions are typically not directed by the Commission and are left to the Company to negotiate with landowners.

Xcel Energy understands Global Minerals' third point pertains to the possibility that the line will be moved again at some point in the future, and their request that such a move be accomplished in 4 years. Xcel Energy is currently working with land and mineral owners along the route to obtain necessary land rights. The land rights the Company is working to obtain will be in the form of a temporary easement that requires the Company to move the line again if mining is proposed at the new location. The timeline for such a move will be part of the negotiation.

The Company's understanding of the cumulative knowledge of the stakeholder group it engaged in developing this Minor Alteration is that it is unlikely that the location of the proposed route would be mined in the foreseeable future. However, as technology and economics of mining change, it may be necessary to move the line again. Any future movement of the line would likely require it to be routed farther to the east, possibly along Highway 169. Any route farther to the east would be longer and would pass between the City of Chisholm and the Discovery Center and parkland along Highway 169. Xcel Energy believes that if the line were to be moved again, it would require a route permit process (as opposed to a minor alteration), and therefore it would not be feasible to place a four year time limit on the development, permitting and construction of a future re-route.

CONCLUSION

Based on the information included on the record, Xcel Energy believes the proposed alteration of Line 5702 does not significantly change the human or environmental impacts of the existing facility, and respectfully requests the Commission approve this Minor Alteration.

If there are any questions regarding this filing, please contact Tom Hillstrom, Xcel Energy, at (612) 330-5835 or thomas.hillstrom@xcelenergy.com.

Sincerely,



TOM HILLSTROM
PRINCIPAL AGENT
XCEL ENERGY

cc: Service List