

Office of Land Management

395 John Ireland Boulevard
Saint Paul, MN 55155
MS 678

August 27, 2025

Jim Sullivan
Public Utilities Commission
85 7th Place East, Suite 280
St. Paul, MN 5510

RE: In the Matter of the Application of Xcel Energy for a Certificate of Need, Site Permit, Transmission Line Route Permit, and Pipeline Route Permit for the Lyon County Generating Station in Lyon County, Minnesota Docket Number: E002/CN-25-145; G002/GS-25-154; E002/TL-25-161; G002/GP-25-163

Dear Mr. Sullivan,

On July 31st, 2025, the Minnesota Public Utilities Commission (Commission) issued a Notice of Public Information and Environmental Assessment Scoping Meetings on Xcel Energy's (Applicant) Certificate of Need, Site Permit, Transmission Line Route Permit, and Pipeline Route Permit applications for the Lyon County Generating Station (Project) in Lyon County, Minnesota. The Minnesota Department of Transportation (MnDOT) has reviewed the applications and other available materials regarding the proposed Project and submits the following comments and recommendations in response to the Notice.

MnDOT anticipates incurring minimal impacts to the US 59 right-of-way (ROW) and interests if the Applicant addresses and/or commits to mitigating the following issues:

Access Points from US 59 (Access Permits required)

The Applicant has been in contact with MnDOT District 8 utility permitting staff to discuss safe and permissible points of access from US 59. According to our records, MnDOT would allow two accesses - one temporary access during construction and one permanent (existing to be improved) access to the site at the locations previously agreed upon. Accesses will need to be constructed to MnDOT standards with any variances to the access standard plates requiring prior approval before construction is allowed. No frontage roads will be allowed on MnDOT ROW at any time during the construction process.

Stormwater Ponds (possible Drainage Permit required)

In Table 9-1: *Permits and Approvals* of the Project application, the Applicant notes that a MnDOT Drainage Permit may be required for "Directing stormwater to MnDOT right-of-way." While likely not intentional or confusing verbiage, the Project should not purposefully increase water/alter peak runoff to the US 59 ROW. Given the proximity of the stormwater pond to the US 59 ROW, a site plan/modeling review should occur to determine if a MnDOT Drainage Permit will be required for the Project. MnDOT acknowledges similar comments submitted by the Lyon County Planning and Zoning Drainage Inspector.

Traffic Control

The Applicant is responsible for adhering to all MnDOT temporary traffic control guidelines applicable to the roadways in the area and as determined by MnDOT District 8 staff. The Minnesota Temporary Traffic Control Field Manual is linked below. Additionally, [Guidelines](#) and MnDOT's [Traffic Engineering](#) site are available to help ensure the safety of the traveling public during Project construction.

Should the Commission issue a permit for the Project, continued coordination with MnDOT staff is expected. Any MnDOT permits required as a part of this Project can be coordinated at an earlier time but may not be issued until the Commission has approved all necessary permits for this Project. All applicable [permitting](#), [traffic control](#) and construction coordination efforts should be made through the appropriate MnDOT [district staff](#). MnDOT District Specialists should be given the opportunity to participate in pre-construction meetings as they apply to MnDOT- owned property.

Thank you for the opportunity to provide these comments.

Sincerely,

/s/ Stacy Kotch Egstad

Utility Routing and Siting Coordinator
Minnesota Department of Transportation
Office of Land Management
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cc: MnDOT Permit Staff

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