

April 18, 2024

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

—Via Electronic Filing—

Re: COMMENTS
PROPOSED 345 kV BROOKINGS COUNTY – LYON COUNTY AND HELENA –
HAMPTON SECOND-CIRCUIT PROJECT
DOCKET NOS. E002/CN-23-200 (Certificate of Need); E-002/TL-08-1474
(Minor Alteration)

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy (Xcel Energy or Company), submits these comments in response to the Notice of Comment Period on the Merits of the Certificate of Need Application dated April 2, 2024, and the Notice of Public Hearing, Availability of Environmental Report, and Public Comment Period dated March 22, 2024, in connection with the proposed 345 kilovolt (kV) Brookings County – Lyon County and Helena – Hampton Second-Circuit Project (Project or Brookings Second-Circuit Project). These comments provide updates regarding the Applicants¹ construction schedule for the Brookings County to Lyon County segment of the Project (Western Segment). We also provide updates on consultation with the State Historic Preservation Office (SHPO). We also respond to several public comments in the record. Finally, we made a correction to the public land survey (PLS) information included in the Project Location section of the Minor Alteration application (MA Application).

Procedural Background

The Applicants filed the Certificate of Need application (CN Application) for the Project on August 15, 2023, and the MA Application on November 13, 2023. The Minnesota Public Utilities Commission (Commission or MPUC) and Department of Commerce, Energy Environmental Review and Analysis (EERA) have held six public hearings and multiple comment periods in connection with the CN Application and

¹ In addition to Xcel Energy, the Applicants are Central Minnesota Municipal Power Agency, Great River Energy, Otter Tail Power Company, and Western Minnesota Municipal Power Agency.

MA Application (collectively, Applications).² The Company, EERA, and the Commission have met or exceeded all notice requirements. Participation in the public hearings has been marginal, and only a handful of individuals have submitted written comments.

The lack of public participation likely reflects the minimal impacts of the Project. The Applicants designed the Project to avoid and minimize environmental impacts. The Project primarily uses existing structures, and hanging the second circuit via helicopter in most places will significantly reduce land disturbance. Aside from the 11 new structures, ground-disturbing activities will be temporary. The construction impacts will largely be limited to areas of temporary access roads, matting areas, and helicopter landing pads. We anticipate a total of around 66 acres of land disturbance in Minnesota. A small amount of this disturbance—around .01 acres—will be permanent, from placement of the new structures. All of the new structures will be within existing right-of-way.

No commenters have challenged whether the Project is needed. Nor have commenters raised significant concerns regarding the environmental impact of the Project. Several commenters commented on noise caused by the existing transmission line.³ One commenter raised questions about the impact on property values of a second line.⁴ These comments did not challenge the need for the Project or raise concerns about the broader environmental effects of installing a second-circuit. We respond to these comments below.

Proposed Construction Schedule

The proposed in-service date for the Western Segment of the Project is September 30, 2024. The primary reason for this proposed date is that the original Brookings County – Hampton transmission line (Original Brookings Line) must be taken out of service during construction. The Applicants are seeking to avoid having the Original Brookings Line out of service during the fall when wind generation is relatively high. Accordingly, the outage is scheduled to end with Midcontinent Independent System Operator, Inc. (MISO) on September 30, 2024. If the Applicants do not meet the target in-service date, the outage will need to be extended with MISO. Additionally, the Applicants will need to evaluate whether the congestion savings of having the Project in-service in late 2024 outweighs the increased congestion costs of having the Original Brookings Line out-of-service until construction is complete.

² Notice of Comment Period on the Merits of the Certificate of Need Application (Apr. 2, 2024); Notice of Public Hearing, Availability of Environmental Report, and Public Comment Period (Mar. 22, 2024); Notice of Public Information and Environmental Report Scoping Meetings (Nov. 22, 2023); Notice of Comment Period on Application Completeness and Variance Request (Aug. 18, 2023).

³ Comment of Vanessa Wells (Mar. 30, 2024); Lakeville Hearing Transcript at 22-23 (Dec. 12, 2023).

⁴ Comment of Geraldine Klaus (Dec. 21, 2023); Comment of Geraldine Klaus (Apr. 8, 2024).

To help ensure the outage for the Western Segment can end on September 30, 2024, the Applicants plan to begin preconstruction activities in western Minnesota at the end of April or the first half of May. These activities may begin before the MPUC issues a formal written decision on the Project. The preconstruction activities we anticipate completing in Minnesota include laying matting in temporary workspaces, and staging equipment and materials. None of the preconstruction activities undertaken will involve ground disturbance or conductor installation. The Company will notify affected landowners before beginning any of this work.

The Company also anticipates submitting its plan and profile documents to EERA after the administrative law judge issues the summary of public comment on May 2, 2024. The Company hopes this pre-decisional review can replace the 30-day review generally required after receipt of the written order. The proposed schedule in **Table 1** should allow the Applicants to meet their target in-service date for the Western Segment:

Table 1: Proposed Western Segment Construction Schedule

Activity	Timeline (2024)
Preconstruction Activities	
Prepare Material Storage Yards	April 24 – May 20
Minnesota Construction Activities	
Construct new transmission tower at Steep Bank Lake Substation	May 20 - June 17
Reconfigure Steep Bank Lake Substation	May 20 - September 30
Reconfigure and Install New Circuit Breakers at the Lyon County Substation	May 28 - August 20
Install Second Circuit (Minnesota Border to Steep Bank Lake Substation)	May 20 - July 15
Install Second Circuit (Steep Bank to Hawks Nest Substation)	July 16 - August 15
Install Second Circuit (Hawks Nest to Lyon County Substation)	August 16 - September 30
Install New Substation Dead End and Bay Position at Lyon County Substation	August 20 - September 20

The Company recognizes that it must obtain written Commission approval before starting activities listed under “Minnesota Construction Activities” in **Table 1**.

The Company further acknowledges that obtaining a written Commission decision by May 20 suggests a relatively quick turnaround time after deliberations. We appreciate the efforts the Commission, the Office of Administrative Hearings, and EERA have already taken to expedite review of this Project. We believe that continuing to push this schedule will benefit the Applicants' customers and the public interest through anticipated increased reliance on low-cost, renewable generation and avoidance of some congestion charges.⁵

State Historic Preservation Office Consultation

The Company has been consulting with the SHPO under delegated authority from the Commission.⁶ The Company started consultation on April 4, 2024, the same day as the final public hearing, and therefore is now updating the Commission on the status of consultation.

The Company's consultant, Stantec, stated in its letter initiating the consultation process that there will be no historic properties affected by the Project within the previously permitted area of the Original Brookings Line (15 acres) and recommended:

- No additional survey work be completed in the previously permitted area;
- Archeological survey work be completed on 7.1 acres outside the area not previously permitted; and
- Xcel Energy be required to follow the previously approved unanticipated discovery plan should cultural resources be identified during construction.

The archeological survey work referenced above is currently in progress was completed on April 18, and no historic properties were identified. We were unable to complete archeological survey work until recently because the survey requires that the ground be unfrozen and unhindered by snow cover. The results of the archaeological survey will be sent to SHPO the week of April 22, 2024 with a recommendation of "no historic properties affected." We anticipate SHPO will agree with our recommendations and provide their concurrence in letter format within 60 days of the receipt of the report.

We will keep the Commission updated regarding our consultation with SHPO, including regarding any permit terms and conditions agreed upon by the Applicants and SHPO. We will also provide any letters from SHPO with objections, comments, concerns, or other recommendations regarding the Project.

⁶ Notice of Comment Period on Application Completeness and Variance Request, Attachment A.

Response to Comments

Several landowners along the Project line have submitted comments regarding the effect of the Original Brookings Line and the Brookings Second-Circuit Project on their property. We respond to several of those comments below.

Vanessa Wells submitted comments raising questions about electric and magnetic fields (EMF) and audible noise levels she has experienced when walking along the Original Brookings Line near her home in the New Market Township area.⁷ On April 9, 2024, an Xcel Energy electrical engineer visited the location where Ms. Wells noted the issues. The ground connections to poles, insulators, and hardware all appeared to be intact and undamaged. The magnetic field alongside and directly underneath the Original Brookings Line were measured. The readings ranged from around 30 to 50 milligauss (mG). These measurements are consistent with the magnetic field projections of around 25-115 mG within the right of way.⁸ The line's operation was not noticeable at the transmission towers but was noticeable between the structures where the line was closest to the ground. Overall, nothing outside of the typical operating conditions was observed. Nor was anything observed that would raise concerns regarding safety or materials failure. We have communicated these findings to Ms. Wells.

Geraldine Klaus submitted comments urging EERA to consider the Project's impacts to the Vermillion River and impacts on property values. The environmental report noted that the Applicants will install no new structures in or near the Vermillion River and no earthwork will occur near the Vermillion River.⁹ The Company also notes that existing easements with landowners cover the installation of the second circuit.

Dan Wombeke commented during the virtual hearing on April 4, 2024, that the Original Brookings Line made significant noise near his home. He noted Great River Energy resolved this issue in late 2023 but expressed concerns about potential recurrence of noise problems with the installation of the second circuit.¹⁰ Xcel Energy understands that non-standard glass bell insulators were originally installed. The use of the non-standard insulators was causing unexpected noise. GRE replaced the non-standard insulators, which resolved the noise issue. The Applicants plan to install standard insulators along the length of the Brookings Second-Circuit Project. Use of standard insulators should prevent the unexpected noise issues Mr. Wombeke experienced. The Company is committed to working with landowners to address any unanticipated issues that arise with the operation of the Brookings Line.

⁷ Comment of Vanessa Wells (Mar. 30, 2024).

⁸ CN Application at 116; Scoping Comments of Xcel Energy at 3 (Jan. 3, 2024).

⁹ Environmental Report at 43; Comments of Geraldine Klaus (Apr. 8, 2024).

¹⁰ Virtual-Hearing Transcript at 14-15 (Apr. 4, 2024).

Finally, Carol Overland made oral comments on April 1, 2024, in Marshall, Minnesota. Ms. Overland's comments challenged the need for all the transmission projects under consideration in Minnesota.¹¹ The Brookings Second-Circuit Project is a local economic project aimed at limiting congestion charges and facilitating the dispatch of low-cost renewable energy, and it is independently supported and justified, regardless of whether other proposed transmission projects proceed. We do not address the basis for other transmission projects here, but note that Xcel Energy, MISO, and other transmission owners evaluate transmission projects holistically. Network upgrade projects are evaluated at the broad system level. Other projects under consideration, such as those that are part of MISO's Long Range Transmission Planning Tranche 1 portfolio, are regional projects that have both significant reliability and economic benefits. Those transmission projects undergo in-depth stakeholder analysis and will proceed only if approved after rigorous regulatory review.

Correction to Minor Alteration Application

The Company also submits corrections to PLS information included in the Project Location portion of the MA Application. EERA reached out to Xcel Energy in March 2024 to note apparent inconsistencies in PLS data reported in Table 2-1 of the MA Application and county highway maps. These errors resulted from county, township, range, and section boundaries not aligning in the geographic information system (GIS) data the Applicants used. We apologize for the error and appreciate EERA identifying the errors. Attached to these comments is an updated table showing the corrected township, range, and section numbers. These changes do not impact the environmental information analyzed in the Applications.

Conclusion

We again wish to express our appreciation for what stakeholders have already done to ensure a robust and efficient review process. By continuing to proceed intentionally, we believe a fall 2024 in-service date for the Western Segment is realistic. Please contact me at monsherra.s.blank@xcelenergy.com or (214) 422-3672 if you have any questions regarding this filing.

Sincerely,

/s/ Monsherra S. Blank

MONSHERRA S. BLANK
DIRECTOR, REGULATORY AND STRATEGIC ANALYSIS

c: Service Lists

¹¹ Marshall Hearing Transcript at 14-17 (Apr. 1, 2024).

Table 2-1 Project Parcels (Redline)

County	City/Township Name	Type	Township	Range	Section
Western Segment					
Lincoln	Hendricks	Township	112	46	2 1-5, 8, 11, 17, <u>20</u> , 29- 30 , 32
			112	47	25, 36
	Limestone	Township	112	44	1, 3 , 5 - 6 , <u>8</u>
			113	43	31
	Nordland	Township	112	44	4
			113	43	31
	Royal	Township	112	45	2 , 4 6, 8 9, 1 -11
Shaokatan	Township	111	47	1, <u>12</u>	
Lyon	Eidsvold	Township	113	43	31 , 34 <u>1-36</u>
	Fairview	Township	112	41	2 , <u>1</u> -5, 11- 12 , 14, 24 <u>23</u> -26, 35-36
	Grandview	Township	112	42	2 3 , <u>1</u> -6
			112	43	4
	Limestone	Township	113	43	31
	Nordland	Township	112	43	1, 3
			113	43	31 , 35
	Stanley	Township	112	40	28 -29, <u>31</u> -32
	Vallers	Township	112	41	5
			113	41	33 <u>31-35</u>
	Westerheim	Township	112	42	2 3 , 6
			112	43	4
			113	42	31, 35
	Eastern Segment				
Dakota	Castle Rock	Township	113	19	2-8, <u>10</u> -11
			113	20	12 - 13
	Empire	City	114	18	31
			114	19	35-36
	Eureka	Township	113	19	7
			113	20	7-13, 15-16, 18
Vermillion	Township	114	18	31-32	
Scott	Belle Plaine	Township	113	24	25, 36
	Cedar Lake	Township	113	21	18 - 19

County	City/Township Name	Type	Township	Range	Section
			113	22	13, 19-21, 23-26, 28-30
	Eureka	Township	113	21	13
	Helena	Township	113	23	21 9-223, 26 25-27, 29-31
	New Market	Township	113	21	13-19, 30

Table 2-1 Project Parcels (Clean)

County	City/Township Name	Type	Township	Range	Section
Western Segment					
Lincoln	Hendricks	Township	112	46	1-5, 8, 11, 17, 20, 29-30, 32
			112	47	25, 36
	Limestone	Township	112	44	1-6, 8
	Royal	Township	112	45	1-11
	Shaokatan	Township	111	47	1, 12
Lyon	Eidsvold	Township	113	43	31-36
	Fairview	Township	112	41	1-5, 11-14, 23-26, 35-36
	Grandview	Township	112	42	1-6
	Nordland	Township	112	43	1, 3
	Stanley	Township	112	40	28-29, 31-32
	Vallers	Township	113	41	31-35
	Westerheim	Township	113	42	31, 35
Eastern Segment					
Dakota	Castle Rock	Township	113	19	2-8, 10-11
	Empire	City	114	19	35-36
	Eureka	Township	113	20	7-13, 15-16, 18
	Vermillion	Township	114	18	31-32
Scott	Belle Plaine	Township	113	24	25, 36
	Cedar Lake	Township	113	22	13, 19-21, 23-26, 28-30
	Helena	Township	113	23	19-23, 25-27, 29-31
	New Market	Township	113	21	13-19, 30

CERTIFICATE OF SERVICE

I, Michaelle Rogers-Lesch, have this day served copies of the foregoing document(s) on the attached list(s) of persons by electronic service using the Minnesota Public Utilities Commission's electronic docket system.

Docket Nos. CN-23-200 E-002/TL-08-1474

I certify under penalty of perjury that everything I have stated in this document is true and correct.

Dated this 18th day of April 2024

/s/ Michaelle Rogers-Lesch 1

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Bell	david.bell@state.mn.us	Department of Health	POB 64975 St. Paul, MN 55164	Electronic Service	No	OFF_SL_23-200_Official CC Service List
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_Official CC Service List
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_Official CC Service List
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_Official CC Service List
Michael	Drysdale	Drysdale.michael@dorsey.com	Dorsey & Whitney LLP	50 South Sixth Street, Suite 1500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-200_Official CC Service List
Kate	Fairman	kate.frantz@state.mn.us	Department of Natural Resources	Box 32 500 Lafayette Rd St. Paul, MN 551554032	Electronic Service	No	OFF_SL_23-200_Official CC Service List
Annie	Felix Gerth	annie.felix-gerth@state.mn.us		Board of Water & Soil Resources 520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	OFF_SL_23-200_Official CC Service List
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_23-200_Official CC Service List
Todd	Green	Todd.A.Green@state.mn.us	Minnesota Department of Labor & Industry	443 Lafayette Rd N St. Paul, MN 55155-4341	Electronic Service	No	OFF_SL_23-200_Official CC Service List
Kari	Howe	kari.howe@state.mn.us	DEED	332 Minnesota St, #E200 1ST National Bank Bldg St. Paul, MN 55101	Electronic Service	No	OFF_SL_23-200_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ray	Kirsch	Raymond.Kirsch@state.mn.us	Department of Commerce	85 7th Place E Ste 500 St. Paul, MN 55101	Electronic Service	No	OFF_SL_23-200_Official CC Service List
Chad	Konickson	chad.konickson@usace.army.mil	U.S.Army Corps of Engineers	180 5th St # 700 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_23-200_Official CC Service List
Stacy	Kotch Egstad	Stacy.Kotch@state.mn.us	MINNESOTA DEPARTMENT OF TRANSPORTATION	395 John Ireland Blvd. St. Paul, MN 55155	Electronic Service	No	OFF_SL_23-200_Official CC Service List
Dawn S	Marsh	dawn_marsh@fws.gov	U.S. Fish & Wildlife Service	Minnesota-Wisconsin Field Offices 4101 American Blvd E Bloomington, MN 55425	Electronic Service	No	OFF_SL_23-200_Official CC Service List
Christa	Moseng	christa.moseng@state.mn.us	Office of Administrative Hearings	P.O. Box 64620 Saint Paul, MN 55164-0620	Electronic Service	Yes	OFF_SL_23-200_Official CC Service List
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_Official CC Service List
Stephan	Roos	stephan.roos@state.mn.us	MN Department of Agriculture	625 Robert St N Saint Paul, MN 55155-2538	Electronic Service	No	OFF_SL_23-200_Official CC Service List
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_23-200_Official CC Service List
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_23-200_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_23-200_Official CC Service List
Zeviel	Simpser	simpser.zev@dorsey.com	Dorsey & Whitney LLP	50 South Sixth Street Suite 1500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-200_Official CC Service List
Jayne	Trusty	execdir@swrdc.org	SWRDC	2401 Broadway Ave #1 Slayton, MN 56172	Electronic Service	No	OFF_SL_23-200_Official CC Service List
Jen	Tyler	tyler.jennifer@epa.gov	US Environmental Protection Agency	Environmental Planning & Evaluation Unit 77 W Jackson Blvd. Mailstop B-19J Chicago, IL 60604-3590	Electronic Service	No	OFF_SL_23-200_Official CC Service List
Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources	500 Lafayette Road Box 25 St. Paul, MN 55155-4040	Electronic Service	No	OFF_SL_23-200_Official CC Service List
Alan	Whipple	sa.property@state.mn.us	Minnesota Department Of Revenue	Property Tax Division 600 N. Robert Street St. Paul, MN 551463340	Electronic Service	No	OFF_SL_23-200_Official CC Service List
Jonathan	Wolfgram	Jonathan.Wolfgram@state.mn.us	Office of Pipeline Safety	445 Minnesota St Ste 147 Woodbury, MN 55125	Electronic Service	No	OFF_SL_23-200_Official CC Service List