

**STATE OF MINNESOTA
BEFORE THE COURT OF ADMINISTRATIVE HEARINGS
FOR THE PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE ROUTE PERMIT
APPLICATION FOR THE MANKATO TO
MISSISSIPPI RIVER 345 kV TRANSMISSION
PROJECT IN SOUTHERN MINNESOTA

CAH Docket No. 62-2500-40099
MPUC Docket No. E002/TL-23-157

**XCEL ENERGY'S
POST-HEARING BRIEF**

I. INTRODUCTION

Northern States Power Company, doing business as Xcel Energy (Xcel Energy or Applicant) appreciates the engagement of the public, state agencies, tribes, local government units, and other stakeholders in this Route Permit proceeding for the Mankato – Mississippi River Transmission Project (Project). In its Joint Certificate of Need and Route Permit Application, Xcel Energy put forth several route alternatives for Segments 1, 2, and 4 of the Project.¹ During the Route Permit proceeding, Xcel Energy continued to analyze these routes and the new route alternatives put forth during the scoping process for Environmental Impact Statement (EIS). In its Direct Testimony, Xcel Energy stated its preference for Route Segment B, for Segments 1 and 2, and Route Segment A, for Segment 4.² After reviewing all of the comments received during this proceeding, reviewing the EIS, and comparing the impacts of the route alternatives against the Minnesota Public Utilities Commission's (Commission) routing

¹ See Ex. Xcel-15 (Application). No route alternatives were put forth for Segment 3 as this segment involves converting about 27 miles of existing 161/345 kV transmission line to 345/345 kV operation and installing about 16 miles of new 345 kV circuit on existing 345/345 double-circuit structures. All of this work will be conducted within existing right-of-way.

² See Ex. Xcel-29 (E. Heine Direct Testimony and Schedules). The EIS named the routes preferred by Xcel Energy as “Route Option B” for Segments 1 and 2 and “Route Option A” for Segment 4. These are not the same terminology that was used in Xcel Energy’s Direct Testimony as this testimony was filed prior to the issuance of the Draft EIS. For the remainder of this Brief, Xcel Energy adopts and uses terminology used by the EIS to describe the route options for the Project.

factors, Xcel Energy continues to support Route Option B, for Segments 1 and 2, but now also supports Route Option D, in addition to Route Option A, for Segment 4.

Minn. Stat. § 216E.03, subd. 7(a) provides that the Commission's routing determinations "must be guided by the state's goals to conserve resources, minimize environmental impacts, minimize human settlement and other land use conflicts, and ensure the state's electric energy security through efficient, cost-effective power supply and electric transmission infrastructure."³ In this Post-Hearing Brief (Brief), Xcel Energy demonstrates that its preferred routes for the Project are consistent with this statutory guidance and the routing criteria in Minn. R. 7850.4100. This Brief does not address each of the routing criteria contained in Minn. R. 7850.4100 but rather highlights certain criteria that demonstrate that Xcel Energy's preferred routes are the best routes for the Project. A complete analysis of each of the statutory and rule criteria for a route permit is provided in Xcel Energy's Proposed Findings of Fact, Conclusions of Law, and Recommendations filed concurrently with this Brief.

This Brief also addresses notice provided for this proceeding and proposed special conditions for the Route Permit.

II. XCEL ENERGY'S PREFERRED ROUTES ARE THE BEST ROUTES FOR PROJECT

The EIS analyzed the potential impacts of the Project by developing end-to-end routes for Segments 1 and 2 and for Segment 4. In this Brief, Xcel Energy compares its preferred routes for these segments to the other end-to-end routes analyzed in the EIS. This Brief does not address Segment 3 of the Project because no route alternatives were proposed for this segment. The three end-to-end route options described in the EIS for the 345 kV line in Segments 1 and 2 are: (1) Route Option A – Segment 1 North and Segment 2 North; (2) Route Option B – Segment 1 North (with Route Segment

³ As the Application for this Project was filed prior to July 1, 2025, the Application is being reviewed under Minn. Stat. Ch. 216E and Minn. R. Ch. 7850 rather than Minn. Stat. Ch. 216I. Notice of Legislative Changes (July 9, 2025) (eDocket No. [20257-220799-01](#)).

18), Segment 2 North, Connector Segment 2G, and Segment 2 South; and, (3) Route Option C – Route Segment 17 or Highway 14 Option.⁴ The four end-to-end route options for the 161 kV line in Segment 4 are: (1) Route Option A – Segment 4 West Modification option and then the south-south option near Highway 52; (2) Route Option B – Segment 4 West Modification option and then the south-north option near Highway 52; (3) Route Option C – Segment 4 East option and then the south-north option near Highway 52; and, (4) Route Option D – CapX Co-Locate Option.⁵ Maps of these different route options are provided as **Addendum 1** to the Xcel Energy’s Proposed Findings of Fact, Conclusions of Law, and Recommendations and are also provided in the Final EIS (FEIS).⁶

A. Segments 1 and 2: Route Option B Meets Commission’s Routing Criteria and Minimizes Human and Environmental Impacts

1. Route Option B Minimizes Residential Impacts

Pursuant to Minn. R. 7850.4100(A), the Commission must consider effects of the route on human settlement. During the public hearings and during the public comment period, a number of landowners expressed concern about the proximity of the proposed Project to their residences.⁷ Route Option B minimizes impacts to residences because it has less residences within the right-of-way, and within 1,600 feet of the centerline of the alignment, as compared to Route Options A and C.⁸ The table below compares the number of residences located within certain distances of the proposed centerline for the three route options.

⁴ Ex. EERA-10 at 518 (FEIS); Ex. EERA-10 at Map 47 (FEIS).

⁵ Ex. EERA-10 at 794 (FEIS); Ex. EERA-10 at Map 74 (FEIS).

⁶ Ex. EERA-10 at Maps 47 and 74 (FEIS).

⁷ See Mankato Pub. Hrg. Tr. at 40:21-45:18 (May 27, 2025) (Mueller); Zumbrota Pub. Hrg. Tr. at 54:05–56:21 (May 28, 2025) (Barajas); Comment by Randa Tolzman (Aug. 13, 2024) (eDocket No. [20248-209459-15](#)); Comment by Brady Taylor & Jennifer Heibel (May 28, 2025) (eDocket No. [20255-219330-01](#)).

⁸ Ex. EERA-8 at 519 (FEIS).

Table 1. Comparison of Residential Impacts⁹

Route Option	Route Option A	Route Option B	Route Option C
Residences within 0-75 feet	1	0	4
Residences within 75-500 feet	175	122	71
Residences within 500-1,600 feet	158	96	179
Total Residences within 1,600 feet	334	218	254

As shown in the table above, Route Option B has 218 residences within 1,600 feet of the proposed centerline compared to 334 for Route Option A and 254 for Route Option C. Route Option B is also the shortest of the three route options at 76.0 miles compared to 83.3 miles for Route Option A and 95.2 miles for Route Option C.¹⁰ The shorter length of Route Option B also helps minimize both human and environmental impacts as compared to the other two route options.

2. Route Option B Provides Opportunities to Double-Circuit with Existing Transmission Lines for Over Half its Length

Route Option B also compares favorably to Route Option A when examining opportunities to double-circuit with existing transmission lines. Route Option B could be double-circuited with existing transmission lines for 55 percent of its length.¹¹ While Route Option A could be double-circuited with existing transmission lines for 83 percent of the length, a portion of these lines are 69 kV lines that run along state and local roads¹² often located within road right-of-way. As 69 kV lines have a narrower right-of-way than the proposed 345 kV line, the Project will be required to deviate from the existing 69 kV right-of-way to avoid displacing existing residences.¹³ Route Option B also provides greater opportunities for double-circuiting with existing transmission

⁹ Ex. EERA-8 at 519 (FEIS).

¹⁰ Ex. EERA-8 at 519 (FEIS).

¹¹ Ex. EERA-8 at 519 (FEIS).

¹² Ex. EERA-8 at 519 (FEIS).

¹³ Ex. Xcel-29 at 18 (E. Heine Direct Testimony and Schedules).

lines as compared to Route Option C, which can only be double-circuiting with existing lines for 19 percent of its length. The table below summarizes the double-circuiting opportunities for the three route options for Segments 1 and 2.

Table 2. Comparison of Double-Circuiting Opportunities¹⁴

Route Option	Route Option A (83.3 miles long)	Route Option B (76.0 miles long)	Route Option C (95.2 miles long)
Double-circuit with existing 69 kV (miles, percent)	26.7 (32%)	5.5 (7%)	0
Double-circuit with existing 115 kV (miles, percent)	35.0 (42%)	33.5 (44%)	4.0 (4%)
Double-circuit with existing 161 kV (miles, percent)	<0.1	<0.1	<0.1
Double-circuit with existing 345 kV (miles, percent)	0 (0%)	0 (0%)	13.9 (15%)
Total Opportunity for double-circuiting with existing transmission lines	61.7 (74%)	39.0 (51%)	17.9 (19%)

3. Route Option B Appropriately Minimizes Potential Environmental Impacts

As Route Option B will be double-circuited with existing transmission lines for 51 percent of its length, this design will also help minimize potential environmental impacts. For instance, the public waters inventory (PWI) and wetland crossings along Route Option B will be in locations where the new 345 kV line will be double-circuited with an existing line.¹⁵ The same is true for the locations where Route Option B will cross Wildlife Management Areas, an Aquatic Management Area, and a Scientific and Natural Area.¹⁶ In each of these locations, the new 345 kV line will be double-circuited with an existing line that already crosses these areas or where the final alignment could be adjusted to avoid the area entirely.¹⁷

¹⁴ Ex. EERA-8 at 519 (FEIS).

¹⁵ Ex. EERA-8 at 523 (FEIS).

¹⁶ Ex. EERA-8 at 523 (FEIS).

¹⁷ Ex. EERA-8 at 523 (FEIS).

4. Route Option B is Less Costly than Route Option C

Under Minn. R. 7850.4100(L), the Commission must also consider costs of constructing, operating, and maintaining the selected route. Xcel Energy prepared a comparison of the estimated costs to construct Route Option B and Route Option C.¹⁸ As shown in the table below, Route Option C is approximately \$55 million more expensive to construct than Route Option B.

Table 3. Construction Cost Comparison for Route Options B and C¹⁹

Route Options for Segments 1 and 2	Capital Expenditures (\$Millions)
Route Option B	\$341.9
Route Option C	\$397.1

5. Route Option B Provides Greater Opportunities for Future Expansion of the Transmission System

Xcel Energy also supports the selection of Route Option B as it more easily enables future expansion of the transmission system.

One of the reasons that Xcel Energy proposed the routes that it did in its Application was the fact that these routes were located near the West Faribault Substation. This was done to allow the potential for a future 345 kV connection into the West Faribault Substation to support greater renewable generation in this area.²⁰ By routing the new 345 kV line as close as possible to the West Faribault Substation, there is the ability to make this future 345 kV connection while minimizing impacts. Route Option B is located approximately 0.13 miles or 690 feet from the West Faribault Substation while Route Option C is located 15 miles to the south. If Route Option C

¹⁸ Ex. Xcel-35 at 4 (T. Wendland Surrebuttal). Xcel Energy did not prepare a cost estimate for Route Option A but since this route is longer than Route Option B, it is anticipated that Route Option A would be more expensive to construct. See EERA-8 at 524 (FEIS).

¹⁹ Ex. Xcel-35 at 4 (T. Wendland Surrebuttal).

²⁰ See Ex. Xcel-15 at 26 (Application) (“By routing the new 345 kV transmission line as close as possible to the existing lower voltage transmission system near Faribault, there is the ability to make this connection to the backbone transmission system in the future while also minimizing additional impacts to the surrounding area.”)

is selected, a new 15-mile 345 kV transmission line would be required for any future connection of this Project to the West Faribault Substation.²¹

Route Option C also has the potential to make the routing of future transmission projects more difficult. In order to connect to the North Rochester Substation, Route Option C requires a new approximately 13-mile long 345 kV line from where this alternative leaves Highway 14 near Byron to the North Rochester Substation.²² There is already an existing 345 kV line in this corridor, the Pleasant Valley – North Rochester 345 kV line.²³ In December 2024, MISO approved its Tranche 2.1 portfolio of projects. One of the projects that was approved was the Pleasant Valley – North Rochester – Hampton 345 kV project which involves rebuilding the existing Pleasant Valley – North Rochester 345 kV line as a double-circuit 345/345 line.²⁴ The Tranche 2.1 portfolio of projects also includes a new 765 kV transmission line from Pleasant Valley to North Rochester.²⁵ These two new projects are planned for the same corridor as Route Option C and selection of Route Option C will limit the routing opportunities for these two future projects making their routing more challenging.²⁶ In comparison, Route Option B avoids this congested corridor because it enters the North Rochester Substation from the northwest.²⁷

6. Route Option B Avoids Conflicts with Future Projects along Highway 14

Route Option C follows Highway 14 for approximately 75.9 miles. In comments filed in this proceeding, Minnesota Department of Transportation (MnDOT) identified that there are certain areas along Route Option C that will likely be in conflict with future MnDOT highway improvements.²⁸ Route Option B avoids potential impacts

²¹ Ex. Xcel-29 at 14 (E. Heine Direct Testimony and Schedules).

²² Ex. Xcel-29 at 14 (E. Heine Direct Testimony and Schedules).

²³ Ex. Xcel-29 at 14 (E. Heine Direct Testimony and Schedules).

²⁴ Ex. Xcel-29 at 14 (E. Heine Direct Testimony and Schedules).

²⁵ Ex. Xcel-29 at 15 (E. Heine Direct Testimony and Schedules).

²⁶ Ex. Xcel-29 at 15 (E. Heine Direct Testimony and Schedules).

²⁷ See Ex. EERA-8 at Map 47 (FEIS).

²⁸ Comments (Minnesota Department of Transportation) (March 10, 2025) (eDocket No. [20253-216230-01](#)).

with future MnDOT highway projects along Highway 14 as it is not located along Highway 14.

7. Route Modifications for Route Option B

During EIS scoping, there were two route segments and two alignment alternatives proposed for Route Option B within Segment 1.²⁹ The two route segment alternatives are Route Segments 9 and 18.³⁰ Route Segment 18 is a longer version of Route Segment 9. Both alternatives were proposed to minimize tree clearing and to shift the alignment further from Cannon Lake.³¹ Both alternatives would require shifting the alignment of the existing 115 kV line that is proposed to be double-circuited with the 345 kV line in this area.³² Xcel Energy supports inclusion of Route Segment 18 into Route Option B as it minimizes tree clearing in this portion of the route.

The two alignment alternatives for Route Option B are Alignment Alternative 2 and Alignment Alternative 8. As stated in the Direct Testimony of Company witness Heine, Xcel Energy supports Alignment Alternative 2 as it would avoid impacts to a new development that is currently under construction in this area.³³ Xcel Energy takes no position on Alignment Alternative 8 which was proposed to avoid tree removal. Xcel Energy notes that this alignment alternative would also require shifting the alignment of the existing 115 kV line, which would be double-circuited with the 345 kV line in this portion of the route.³⁴

B. Segment 4: Route Option A or D Meets Commission's Routing Criteria and Minimizes Human and Environmental Impacts

Xcel Energy supports selection of either Route Option A or Route Option D for the 161 kV line in Segment 4. Both routes minimize human and environmental

²⁹ Ex. EERA-10 at 30 (FEIS); No route segment or alignment alternatives were proposed for Segment 2.

³⁰ Ex. EERA-10 at 30 (FEIS); Ex. EERA-10 at Map 13-15 (FEIS).

³¹ Ex. EERA-10 at 233-235 (FEIS).

³² Ex. EERA-10 at 233-235 (FEIS).

³³ Ex. Xcel-29 at Schedule 2 at 1 (E. Heine Direct Testimony and Schedules).

³⁴ Ex. Xcel-29 at Schedule 2 at 4 (E. Heine Direct Testimony and Schedules).

impacts due to their double-circuiting (Route Option A) or co-location (Route Option D) with existing transmission lines. Below is a summary of the key routing criteria that distinguish these two route alternatives from the other two end-to-end route alternatives for Segment 4 that were evaluated in the EIS.

1. Route Options A and D Provide the Greatest Opportunities to Double-Circuit or Parallel Existing Transmission Lines

One of the ways to mitigate human and environmental impacts of a new transmission line is to double-circuit or route the line parallel with an existing transmission line. As shown in the table below, Route Option A is proposed to be double-circuited with existing transmission lines for 74 percent of its length, the most of any of the four route options for Segment 4.

Table 4. Comparison of Double-Circuiting Opportunities³⁵

Route Option	Route Option A (22.1 miles long)	Route Option B (22.5 miles long)	Route Option C (20.0 miles long)	Route Option D (16.4 miles long)
Double-circuit with existing 69 kV (miles, percent)	5.1 (23%)	2.5 (11%)	2.5 (13%)	0
Double-circuit with existing 161 kV (miles, percent)	11.3 (51%)	33.5 (44%)	0 (4%)	0
Total Opportunity for double-circuiting with existing transmission lines	16.4 (74%)	13.8 (61%)	2.5 (13%)	0

In comparison, no portion of Route Option D will be double-circuited with existing transmission lines. This is because Route Option D will be constructed parallel to the existing CapX Hampton – La Crosse 345/345 kV line with the exception of three locations where it would diverge from this existing line to avoid a pinch point.³⁶ As shown in the table below, Route Option D offers the greatest opportunity to parallel existing infrastructure as 84 percent of its length shares or parallels the right-of-way of

³⁵ Ex. EERA-10 at 795 (FEIS).

³⁶ Ex. Xcel-29 at Schedule 2 at 2 (E. Heine Direct Testimony and Schedules).

existing transmission lines or roads. Route Option A offers similar opportunities as 82 percent of its length shares or parallels the right-of-way of existing transmission lines or roads.

Table 5. Comparison of Sharing or Paralleling the Right-of-Way of Existing Infrastructure Opportunities³⁷

Route Option	Route Option A (22.1 miles long)	Route Option B (22.5 miles long)	Route Option C (20.0 miles long)	Route Option D (16.4 miles long)
Sharing or Paralleling Right-of-Way of Existing Transmission Lines (miles, percent)	16.4 (74%)	13.8 (61%)	4.0 (20%)	13.7 (84%)
Sharing or Paralleling Right-of-way of Roads (miles, percent)	9.5 (43%)	7.4 (33%)	12.2 (61%)	<0.1 (0%)
Total Paralleling with existing Transmission Lines and Roads (miles, percent)	18.2 (82%)	16.1 (71%)	13.9 (70%)	13.7 (84%)

2. Route Option D Minimizes Residential Impacts

As noted earlier, the Commission must consider effects of the route on human settlement and impacts to residences was a key concern of many commenters during the proceeding. As shown in the table below, Route Option D has the fewest number of residences within 500 feet of the proposed centerline with 22 residences and Route Option A has the highest number of residences within 500 feet with 132 residences. However, as discussed above, Route Option A will be double-circuiting with existing transmission lines for 74 percent of its length whereas Route Option D does not offer any opportunities for double-circuiting as it will be constructed parallel to the existing 345/345 kV CapX Hampton – La Crosse line. In addition, there are three pinch point locations where Route Option D will diverge from the existing 345/345 kV line. In

³⁷ Ex. EERA-10 at 795 (FEIS).

these locations, certain residences will have a 345/345 kV line on one portion of their property and a new 161 kV line on another portion.³⁸

Table 6. Comparison of Residential Impacts³⁹

Route Option	Route Option A	Route Option B	Route Option C	Route Option D
Residences within 0-50 feet	1 ⁴⁰	1	1	0
Residences within 50-250 feet	49	34	28	1
Residences within 250-500 feet	82	45	75	21
Total Residences within 500 feet	132	80	104	22

3. Route Options A and D Appropriately Minimizes Potential Environmental Impacts

As both Route Options A and D will be double-circuited or parallel with existing transmission lines, both of these routes minimize environmental impacts. For instance, Route Option D has the most stream crossings of the four alternatives and Route Option A has the most PWI crossings.⁴¹ However, many of these watercourse crossings would occur in areas that would be double-circuited with or paralleling existing transmission lines or highway right-of-way.⁴² Likewise, Route Option A intersects a Grassland Bird Conservation Area (GBCA), and all four route options intersect several Wildlife Action Network corridors.⁴³ Yet, all of these crossings occur where there is already an existing transmission line or road crossing.⁴⁴

³⁸ Ex. Xcel-29 at Schedule 2 at 4 (E. Heine Direct Testimony and Schedules).

³⁹ Ex. EERA-10 at 795 (FEIS).

⁴⁰ While Route Option A has one home located within the right-of-way, Xcel Energy will adjust the final alignment to avoid displacement of this residence.

⁴¹ Ex. EERA-10 at 799 (FEIS).

⁴² Ex. EERA-10 at 799 (FEIS).

⁴³ Ex. EERA-10 at 799 (FEIS).

⁴⁴ Ex. EERA-10 at 799 (FEIS).

4. Route Modifications For Route Options A and D

During EIS scoping, there were no alignment alternatives proposed for Route Option A and there was one alignment alternative proposed for Route Option D.⁴⁵ This alignment alternative is Alignment Alternative 15 which is approximately 1.2 miles long and is an alternative Zumbro River crossing location for Route Option D. Route Option D crosses the Zumbro River adjacent to the existing CapX line, and Alignment Alternative 15 would cross the river further south, on the south side of County Road 12.⁴⁶ As stated in the Direct Testimony of Company witness Heine, Xcel Energy takes no position on this alignment alternative because it has similar impacts as the proposed alignment.⁴⁷

III. NOTICE OF THE PROCEEDING

Many commenters at the public hearings expressed concern about the notice provided related to this proceeding.⁴⁸ With regard to notice, Xcel Energy notes that it provided all of the notices required by statute and rule⁴⁹ and provided additional notices to the inform the landowners, local government units, and other stakeholders of the new route alternatives proposed during EIS scoping.⁵⁰ Xcel Energy also maintains a Project website that provides information about the Project and updates about the current proceeding such as providing the dates and times for the public hearings.⁵¹ Xcel Energy appreciates the robust public engagement in this proceeding and the time and effort put forth by landowners, state and local government agencies, tribes, and others to provide comments both in writing and at the public hearings. These comments

⁴⁵ Ex. EERA-10 at 44 (FEIS).

⁴⁶ Ex. EERA-10 at 50 (FEIS).

⁴⁷ Ex. Xcel-29 at Schedule 2 at 5 (E. Heine Direct Testimony and Schedules).

⁴⁸ Waterville Pub Hrg. Tr. at 66:11-68:18 (May 27, 2025) (Overland); Zumbrota Pub. Hrg. Tr. at 117:13-125:09 (May 28, 2025) (Z. Knutson); Zumbrota Pub. Hrg. Tr. at 140:19-142:06 (May 28, 2025) (Hassler).

⁴⁹ Ex. Xcel-21 (Notice of Filing of Route Permit Application Compliance Filing).

⁵⁰ Ex. Xcel-34 (Letter Regarding Mailed Notice of Scoping Decision); Ex. Xcel-29 at Schedule 4 (E. Heine Direct Testimony and Schedules).

⁵¹ See <https://mmrtproject.com/events/>.

provided important information in this proceeding about the potential impacts of different route alternatives.

IV. SPECIAL CONDITIONS TO ROUTE PERMIT

In its Response to Public Comments filed concurrently with this Brief, Xcel Energy provides a response to the special Route Permit conditions proposed by the Minnesota Department of Natural Resources (MnDNR). As stated in this response, Xcel Energy does not object to the MnDNR's proposed special conditions related to calcareous fens, coordination related to avian flight diverters, wildlife-friendly erosion control, avoidance of certain dust control products, facility lighting, and working with the Interagency Vegetation Management Planning Working Group (VMPWG) on finalizing the Vegetation Management Plan (VMP).⁵² The remaining conditions proposed by the MnDNR are not necessary as they are duplicative of other standard conditions or are unworkable for this Project. For instance, the MnDNR recommends a special condition requiring Xcel Energy to coordinate and seek necessary permits from the U.S. Fish and Wildlife Service (USFWS) related to federally protected species.⁵³ This proposed special condition is already covered by the standard permit condition in Section 5.5.2 that requires a permittee to obtain all necessary federal, state, and local permits prior to construction.⁵⁴ The MnDNR also recommends that the Route Permit include a special condition requiring that the VMP include a section stating that vegetation removal near floodplains and designated trout streams should be avoided. While Xcel Energy will endeavor to avoid vegetation removal in these areas it cannot guarantee that removal will be avoided if it is necessary for construction or operation of the Project. To date, no other special conditions have been proposed for the Route Permit.

⁵² MnDNR Letter (Comment Letter) (June 10, 2025) (eDocket No. [20256-219807-01](#)).

⁵³ MnDNR Letter at 3 (Comment Letter) (June 10, 2025) (eDocket No. [20256-219807-01](#)).

⁵⁴ Ex. EERA-10 at Appendix H at 11 (FEIS).

V. CONCLUSION

Xcel Energy respectfully requests that the Administrative Law Judge recommend, and that the Commission grant, a Route Permit for Route Option B in Segments 1 and 2, incorporating Route Segment 18 and Alignment Alternative 2, Segment 3, and either Route Option A or Route Option D in Segment 4.

Dated: August 1, 2025

Sincerely,

/s/ Valerie T. Herring

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