



414 Nicollet Mall

Minneapolis, MN 55401

December 15, 2025

—Via Electronic Filing—

Sasha Bergman
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: COMMENTS
GREAT RIVER ENERGY – ROUTE PERMIT APPLICATION FOR THE LAKETOWN
115-KV TRANSMISSION LINE
DOCKET NO. ET-2/TL-24-132

Dear Ms. Bergman,

Northern States Power Company, doing business as Xcel Energy, submits these comments in response to the Commission's request for comments from the Company regarding any concerns about the reliability and cost of Route Alternative B in the above-referenced docket.

In its October 2, 2025 Order in the above-referenced docket, the Commission noted that further record development was needed, including “[c]omments from Xcel Energy regarding any concerns about the reliability and cost of Route Alternative B.” The Commission subsequently opened a Notice of Comment Period, requesting comments by December 16, 2025.

The Company has reviewed the two routes and has no reliability concerns regarding either Applicants' proposed route or Route Alternative B.

From a cost perspective, the Company sees no practical difference between the two routes due to the way that the costs would be allocated by MISO. Both require a three-way switch structure for the proposed line to tap into. Under Route Alternative B, the switch structure would be installed on an Xcel Energy-owned line, at an estimated cost to the Company of approximately \$300,000. Under the Applicants' proposed route, the switch structure would be installed on a GRE-owned line, at an estimated cost to GRE of approximately \$300,000.

Accordingly, the Company has no preference as to which route the Commission selects based on reliability or cost.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact Jody Londo at (612) 216-7954 or Jody.L.Londo@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

JODY LONDO
DIRECTOR, REGULATORY AND STRATEGIC ANALYSIS

cc: Service Lists

CERTIFICATE OF SERVICE

I, Victor Barreiro, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

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

xx electronic filing

DOCKET No. ET-2/TL-24-132

Dated this 15th day of December 2025

/s/

Victor Barreiro
Regulatory Administrator

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Katherine	Arnold	katherine.arnold@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		No	Official CC Service List OAH
2	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	Official CC Service List OAH
3	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	Official CC Service List OAH
4	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	Official CC Service List OAH
5	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	Official CC Service List OAH
6	Chad	Graham	chad.graham@state.mn.us		Public Utilities Commission	171 7th Place E Suite 350 Saint Paul MN, 55101 United States	Electronic Service		No	Official CC Service List OAH
7	Jacques	Harvieux	jacques.harvieux@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 Saint Paul MN, 55101-2147 United States	Electronic Service		No	Official CC Service List OAH
8	Logan	Hicks	logan.m.hicks@state.mn.us		Department of Commerce	85 7th Place East Suite 280 Saint Paul MN, 55101 United States	Electronic Service		No	Official CC Service List OAH
9	Spencer	Howe	spencerh@mvec.net	Minnesota Valley Electric Cooperative		125 Minnesota Valley Electric Dr Jordan MN, 55352 United States	Electronic Service		No	Official CC Service List OAH
10	Breann	Jurek	bjurek@fredlaw.com	Fredrikson & Byron PA		60 S Sixth St Ste 1500 Minneapolis MN, 55402 United States	Electronic Service		No	Official CC Service List OAH
11	Molly	Leisen	mleisen@fredlaw.com	Fredrikson & Byron P.A.		60 South Sixth Street Suite 1500 Minneapolis MN, 55402 United States	Electronic Service		No	Official CC Service List OAH
12	Sam	Lobby	sam.lobby@state.mn.us		Public Utilities Commission	350 Metro Square Building 121 7th Place East St. Paul MN, 55101 United States	Electronic Service		No	Official CC Service List OAH

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
13	Kimberly	Middendorf	kimberly.middendorf@state.mn.us		Office of Administrative Hearings	PO Box 64620 600 Robert St N Saint Paul MN, 55164-0620 United States	Electronic Service		Yes	Official CC Service List OAH
14	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	Official CC Service List OAH
15	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	Official CC Service List OAH
16	Michael	Swenson	mswenson@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	Official CC Service List OAH
17	Haley	Waller Pitts	hwallerpitts@fredlaw.com	Fredrikson & Byron, P.A.		60 S Sixth St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	Official CC Service List OAH