

May 19, 2025

—Via Electronic Filing—

The Honorable Ann O'Reilly
Administrative Law Judge
Office of Administrative Hearings
P.O. Box 64620
St. Paul, MN 55164-0620

RE: *Surrebuttal Testimony of Tony Wendland*
IN THE MATTER OF THE APPLICATION FOR A ROUTE PERMIT FOR THE
MANKATO – MISSISSIPPI RIVER 345 kV TRANSMISSION LINE PROJECT
IN SOUTHEAST MINNESOTA
Docket No. E002/TL-23-157
OAH Docket No. 65-2500-40099

Dear Judge O'Reilly:

Northern States Power Company, doing business as Xcel Energy, respectfully submits the following documents in the above-referenced docket:

- Surrebuttal Testimony of Tony Wendland

We have electronically filed these documents with the Minnesota Public Utilities Commission. As requested in the Second Prehearing Order, we will be providing you with a paper courtesy copy by U.S. Mail. Please contact me at 612-2168274 or lauren.steinhaeuser@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/ Lauren Steinhaeuser

LAUREN STEINHAEUSER
ASSISTANT GENERAL COUNSEL
NORTHERN STATES POWER COMPANY

Enclosures
cc: Service List

Surrebuttal Testimony
Tony Wendland

Before the Minnesota Public Utilities Commission
State of Minnesota

In the Matter of the Application for a Route Permit for the Mankato – Mississippi
River 345 kV Transmission Line Project in Southeast Minnesota

Docket No. E002/TL-23-157
OAH Docket No. 65-2500-40099

**Surrebuttal Testimony of Tony Wendland
on behalf of Northern States Power Company,
doing business as Xcel Energy**

May 19, 2025

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I. INTRODUCTION

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Tony Wendland, and my business address is 414 Nicollet Mall, Minneapolis, Minnesota 55401.

Q. HAVE YOU PREVIOUSLY PROVIDED TESTIMONY IN THIS PROCEEDING?

A. Yes. I filed Direct Testimony on behalf of Northern States Power Company, doing business as Xcel Energy (Xcel Energy) for a Route Permit Application (Application) with the Minnesota Public Utilities Commission (Commission) for the Mankato – Mississippi 345 kV Transmission Project (Project).

Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY?

A. The purpose of my Surrebuttal Testimony is to provide updated cost estimates for the Project based on the Company's May 5, 2025 filing requesting to expand the route width for portions of Route Option 2 North and Route Option 2 South near the North Rochester Substation. A copy of this May 5th filing was provided as Schedule 5 to the Rebuttal Testimony of Company Witness Ellen Heine.

II. UPDATED PROJECT COSTS

Q. HOW DOES THE COMPANY'S PROPOSED ROUTE WIDTH EXPANSION IMPACT THE ESTIMATED PROJECT COSTS?

A. As further detailed in the Rebuttal Testimony of Company Witness Heine, the expanded route width will require constructing the Project's proposed 345 kV transmission line adjacent to the existing Hampton – North Rochester 345 kV

double-circuit capable transmission structures rather than on the open portion of these existing structures on the eastern ends of Route Option 2 North and Route Option 2 South. The cost estimates provided in my Direct Testimony assumed a double-circuit rather than the parallel construction that is now being proposed. This parallel construction will be more costly as compared to the double-circuit construction due to the costs associated with constructing new single-circuit poles and acquiring the necessary land rights.

Q. WHAT ARE THE UPDATED TOTAL ESTIMATED COST FOR THE PROJECT?

A. In Table 2 of my Direct Testimony, Xcel Energy provided the total estimated cost of the Project based the specific costs for each route alternative included in the Environmental Impact Statement (EIS). These costs ranged from \$436.8 million on the low end to \$583.8 million on the high end. An updated version of Table 2 is provided below as Table 1 to reflect the proposed parallel construction of both Route Option 2 North and Route Option 2 South. This parallel construction increased the high-end of the Project's estimated costs from \$583.8 million to \$589.7 million. As with the costs provided in the Table 2 of my Direct Testimony, these costs were escalated to nominal dollars to reflect the expected final cost at completion for each component of the Project.

Table 1. Updated Total Estimated Project Costs

| Project Components | Low Capital Expenditures (\$Millions) | High Capital Expenditures (\$Millions) |
|--|--|---|
| Mankato – Mississippi River 345 kV Transmission Line | \$376.6 | \$490.7 |
| Wilmarth Substation Modifications | \$8.6 | \$9.1 |
| North Rochester Substation | \$10.5 | \$11.5 |

| | | |
|---|----------------|----------------|
| North Rochester to Chester 161 kV Transmission Line | \$41.1 | \$69.7 |
| Eastwood Substation Modifications | \$0 | \$8.7 |
| Total | \$436.8 | \$589.7 |

Q. DOES THE PROPOSED PARALLEL CONSTRUCTION ALSO CHANGE THE ESTIMATED COSTS FOR XCEL ENERGY'S PREFERRED ROUTE?

A. Yes. Xcel Energy's Preferred Route includes Route Option 2 South so the proposed parallel construction will change the estimated costs for Xcel Energy's Preferred Route. I provided a total estimated costs for Xcel Energy's Preferred Route in Table 3 of my Direct Testimony. An updated version of Table 3 is provided below as Table 2. As shown in Table 2, the proposed parallel construction increased the estimated costs of the Preferred Route by \$2.0 million.

Table 2. Updated Total Estimated Costs for Xcel Energy's Preferred Route

| Project Components | Capital Expenditures (\$Millions) |
|--|--|
| Mankato – Mississippi River 345 kV Transmission Line | \$378.6 |
| Wilmarth Substation Modifications | \$8.6 |
| North Rochester Substation | \$10.5 |
| North Rochester to Chester 161 kV Transmission Line | \$69.7 |
| Eastwood Substation Modifications | \$0 |
| Total | \$467.4 |

Q. ARE THERE OTHER TABLES FROM YOUR DIRECT TESTIMONY THAT NEED TO BE UPDATED TO REFLECT THE UPDATED COST ESTIMATE FOR THE PREFERRED ROUTE?

A. Yes. Table 5 in my Direct Testimony provided a comparison of the estimated costs of Xcel Energy's Preferred Route for Segments 1 and 2 to Route Segment 17 (Highway 14 alternative). An updated version of Table 5 is provided below as Table 3.

Table 3. Updated Cost Estimate Comparison for Route Segment 17

| Project Components | Capital Expenditures (\$Millions) |
|--|--|
| Xcel Energy's Preferred Route for Segments 1 and 2 | \$341.9 |
| Route Segment 17 | \$397.1 |

III. CONCLUSION

Q. DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?

A. Yes.

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

DOCKET NO. E002/TL-23-157
OAH DOCKET NO. 65-2500-40099

CERTIFICATE OF SERVICE

Gustav Gerhardson certifies that on the 19th day of May, 2025, on behalf of Northern States Power Company, doing business as Xcel Energy, he efiled a true and correct copy of the **Surrebuttal Testimony of Tony Wendland** by posting the same on [eDockets](#). Said filing is also served as designated on the attached Service List on file with the Minnesota Public Utilities Commission in the above-referenced docket number. A paper copy was also mailed to Judge Ann C. O'Reilly.

/s/ Gustav Gerhardson

Gustav Gerhardson

| # | 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 | 23-157Official CC Service List |
| 2 | Michael W. | Chase | mwchase_kenyon@yahoo.com | Citizens for Environmental Rights and Safety | | 6201 480th St. Kenyon MN, 55946 United States | Electronic Service | | No | 23-157Official CC Service List |
| 3 | 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 | 23-157Official CC Service List |
| 4 | Brent | Dauk | brentdauk@aol.com | | | 140 438th Ave Moose Lake MN, 56063 United States | Electronic Service | | No | 23-157Official CC Service List |
| 5 | Richard | Davis | richard.davis@state.mn.us | | Department of Commerce | 85 7th Place East Suite 500 Saint Paul MN, 55101 United States | Electronic Service | | No | 23-157Official CC Service List |
| 6 | Seth | DeMerritt | seth.demerritt@centerpointenergy.com | CenterPoint Energy Minnesota Gas | | 505 Nicollet Mall Minneapolis MN, 55402 United States | Electronic Service | | No | 23-157Official CC Service List |
| 7 | Bret | Eknes | bret.eknes@state.mn.us | | Public Utilities Commission | Suite 350 121 7th Place East St. Paul MN, 55101-2147 United States | Electronic Service | | No | 23-157Official CC Service List |
| 8 | 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 | 23-157Official CC Service List |
| 9 | Ellen | Heine | ellen.l.heine@xcelenergy.com | Xcel Energy | | 414 Nicollet Mall, MP-8 Minneapolis MN, 55401 United States | Electronic Service | | No | 23-157Official CC Service List |
| 10 | Abigail | Hencheck | ahencheck@mncenter.org | Minnesota Center for Environmental Advocacy | | 1919 University Ave W Suite 515 St. Paul MN, 55104 United States | Electronic Service | | No | 23-157Official CC Service List |
| 11 | Valerie | Herring | vherring@taftlaw.com | Taft Stettinius & Hollister LLP | | 2200 IDS Center 80 S. Eighth Street Minneapolis MN, 55402 | Electronic Service | | No | 23-157Official CC Service List |

| # | First Name | Last Name | Email | Organization | Agency | Address | Delivery Method | Alternate Delivery Method | View Trade Secret | Service List Name |
|----|----------------|--------------------------------|--------------------------------------|-------------------------------------|---|--|--------------------|---------------------------|-------------------|--------------------------------|
| | | | | | | United States | | | | |
| 12 | Jason | Loos | jason.loos@centerpointenergy.com | CenterPoint Energy Resources Corp. | | 505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States | Electronic Service | | No | 23-157Official CC Service List |
| 13 | Jamie | MacAlister | jamie.macalister@state.mn.us | | Department of Commerce | 85 7th Place East, Ste. 500 St. Paul MN, 55101 United States | Electronic Service | | No | 23-157Official CC Service List |
| 14 | Ann | O'Reilly | ann.oreilly@state.mn.us | | Office of Administrative Hearings | PO Box 64620 St. Paul MN, 55101 United States | Electronic Service | | Yes | 23-157Official CC Service List |
| 15 | Carol A. | Overland | overland@legalelectric.org | Legalelectric - Overland Law Office | | 1110 West Avenue Red Wing MN, 55066 United States | Electronic Service | | No | 23-157Official CC Service List |
| 16 | Cezar | Panait | cezar.panait@state.mn.us | | Public Utilities Commission | 121 7th Place East Suite 350 St. Paul MN, 55101 United States | Electronic Service | | No | 23-157Official CC Service List |
| 17 | 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 | 23-157Official CC Service List |
| 18 | Christine | Schwartz | regulatory.records@xcelenergy.com | Xcel Energy | | 414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States | Electronic Service | | No | 23-157Official CC Service List |
| 19 | Will | Seuffert | will.seuffert@state.mn.us | | Public Utilities Commission | 121 7th Pl E Ste 350 Saint Paul MN, 55101 United States | Electronic Service | | Yes | 23-157Official CC Service List |
| 20 | Janet | Shaddix Elling | jshaddix@janetshaddix.com | Shaddix And Associates | | 7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States | Electronic Service | | Yes | 23-157Official CC Service List |
| 21 | Jeffrey | Small | jsmall@misoenergy.org | | | MISO P.O. Box 4202 Carmel IN, 46082-4202 United States | Electronic Service | | No | 23-157Official CC Service List |
| 22 | Lauren | Steinhaeuser | lauren.steinhaeuser@xcelenergy.com | Northern States Power | | 414 Nicollet Mall, 401-08 Minneapolis | Electronic Service | | No | 23-157Official CC |

| # | First Name | Last Name | Email | Organization | Agency | Address | Delivery Method | Alternate Delivery Method | View Trade Secret | Service List Name |
|----|------------|-----------|------------------------------------|---|--------|---|--------------------|---------------------------|-------------------|--------------------------------|
| | | | | Company dba Xcel Energy | | MN, 55401 United States | | | | Service List |
| 23 | Emily | Suppes | emily.suppes@centerpointenergy.com | CenterPoint Energy Minnesota Gas | | 505 Nicollet Mall Minneapolis MN, 55402 United States | Electronic Service | | No | 23-157Official CC Service List |
| 24 | Amelia | Vohs | avohs@mncenter.org | Minnesota Center for Environmental Advocacy | | 1919 University Avenue West Suite 515 St. Paul MN, 55104 United States | Electronic Service | | No | 23-157Official CC Service List |