

August 1, 2024

Richard Davis
Environmental Review Manager
Minnesota Department of Commerce
85 7th Place East, Suite 280
St. Paul, MN 55101

Re: In the Matter of the Application of Xcel Energy for a Certificate of Need and Route Permit for the Mankato – Mississippi River 345 kV Transmission Line Project in Southeast Minnesota
PUC Docket Number: E002/CN-22-532, E002/TL-23-157

Mr. Davis,

On June 24th, 2024, the Minnesota Public Utilities Commission (Commission) and the Minnesota Department of Commerce (DOC) issued a Notice of Public Information and Environmental Assessment Scoping Meetings on Xcel Energy's (Applicant) Certificate of Need (CN) and route permit (RP) applications for the Mankato – Mississippi River 345kV Transmission Line Project (Project). The Minnesota Department of Transportation (MnDOT) has reviewed the applications regarding the proposed Project and submits the following comments in response to the Notice.

MnDOT performed a cursory Project review and submitted review documentation of those findings directly to the Applicant. MnDOT's review included information exchanged during meetings, emails, MnDOT's Utility ENM process, and available project information to-date. Please consider these findings, particularly pages labeled 41-52 of [Appendix M - Tribal and Agency Correspondence Part 2 of 3](#), in the environmental scope of the Project. MnDOT offers the following additional comments and recommendations for consideration.

For all portions of the Project where parallel installation *within* trunk highway rights-of-way is expected, the Applicant should thoroughly research all existing utilities in those areas. Annually, MnDOT issues several thousand utility permits for small-scale installations within our rights-of-way. The Applicant would be responsible for coordinating with and possibly relocating existing utility conflicts within trunk highway rights-of-way needed for this Project. Diligence in this area would benefit downstream permitting processes, overall project constructability, and overall project cost. Additionally, while the Commission may approve permits for route(s) that fall within trunk highway rights-of-way that MnDOT has previously reviewed and determined are constructable, MnDOT continues to reserve the right to dictate pole placement within those areas. Noting that the Applicant is experienced in coordinating with MnDOT on these types of projects, it is strongly suggested that continued coordination focus on the finer details of MnDOT permitting requirements.

Office of Environmental Stewardship

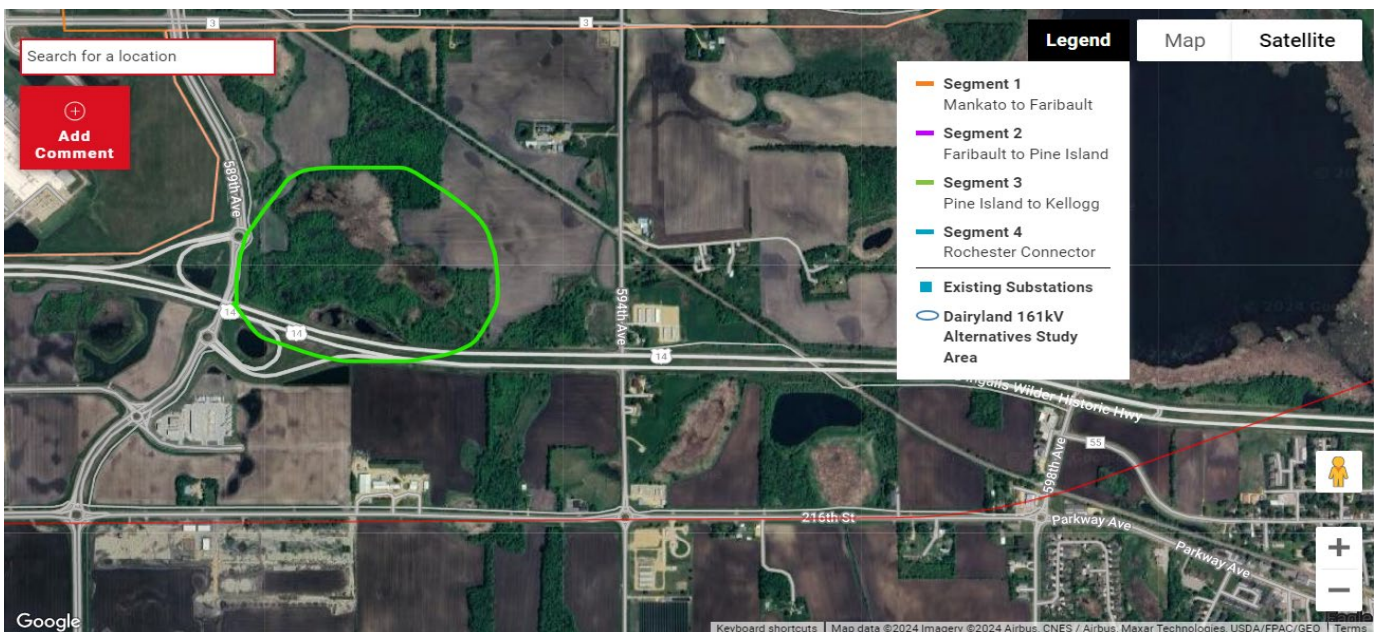
As a standard part of our review process, all applicable MnDOT utility permit applications are subject to review or re-review by our Office of Environmental Stewardship (OES). These reviews may result in additional construction criteria, extended permit review times, additional Project work inspections, utility permit special provisions, and/or a request to move portions of a planned project outside of any given area of concern. Attention should be paid to MnDOT's OES requested deliverables (also in [Appendix M - Tribal and Agency Correspondence Part 2 of 3](#)) that may be required for future utility permit application approvals. Additional consultation may be required to address outstanding issues.

Additional Site-Specific Comments

Within the project area for Segment 1:

1. On the north side of US 14, there is a wooded wetland complex (Figure 1 below) with specific, prohibited actions including clear cutting of vegetation, material filling, water drainage, grade change, excavation and dumping. Placement of transmission line structures in proximity to wetlands must comply with all MnDOT requirements associated with wetland buffers as well as any requirements asserted through the US Army Corps of Engineer's Individual Section 404 permit associated with this wetland.

Figure 1



 Approximate Wetland Area

2. An extension (Figure 2 below) to East Street in Madison Lake (City) north of TH 60 and construction of a new Dollar General Market along with turn lanes to the new street location has recently gone through an approval process in the City and through MnDOT District 7. Plan sheets from the engineer on this project are available upon request. Part of what MnDOT and the City are requiring with this project is that the developer provide sidewalk connectivity to the City's sidewalk network. This is mind, there may be conflicts with infrastructure placement if the new development and Project are not adequately coordinated. MnDOT recommends that the Applicant contact the City to ensure that placement of the transmission poles and lines are coordinated with the placement of the site infrastructure, sidewalk, and the extension of East Street to the north.

Figure 2



 Extension Area

Should the Commission issue a Route 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.

MnDOT has a continuing interest in working with all parties to ensure that possible impacts to the entire state trunk highway system, safety of the traveling public and MnDOT maintenance personnel, and environmentally significant areas of concern are adequately addressed.

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
stacy.kotch@state.mn.us

ec: MnDOT Utility ENM Review Staff

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