

STATE OF MINNESOTA
COURT OF ADMINISTRATIVE HEARINGS
FOR PUBLIC UTILITIES COMMISSION

In the Matter of the Application of Xcel
Energy for a Certificate of Need, Site
Permit, Route Permit, and Pipeline Permit
for the Lyon County Generating Station in
Lyon County, Minnesota

**FINDINGS OF FACT,
CONCLUSIONS OF LAW,
AND RECOMMENDATIONS**

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**FINDINGS OF FACT,
CONCLUSIONS OF LAW,
AND RECOMMENDATIONS**

This matter was assigned to Administrative Law Judge Jim Mortenson to conduct public hearings on the Certificate of Need (CN) (MPUC Docket No. CN-25-145), Site Permit (MPUC Docket No. GS-25-154), Route Permit (MPUC Docket No. TL-25-161), and Partial Exemption and Pipeline Routing Permit (MPUC Docket No. GP-25-163) Combined Application (Application) of Northern States Power Company, a Minnesota corporation, doing business as Xcel Energy (Xcel Energy or Applicant) for the Lyon County Generating Station Project (Project). The Public Utilities Commission (Commission) requested the Judge prepare a full report, including findings and recommendations, on the CN and permits of the Application.

Public hearings on the Application were held on January 26, 2026 (in person) and January 27, 2026 (remote access). The public comment period remained open until February 13, 2026. The Applicant filed proposed findings and responses to comments on February 20, 2026. The Commission's Energy Infrastructure Permitting unit (PUC-EIP) filed its response on February 26, 2026, and the record closed.

Haley Waller-Pitts, Fredrickson & Byron, P.A., appeared on behalf of the Applicant, along with Jared Graham, a representative of the Applicant.

Craig Janezich, Energy Facility Planner, and James E. Sullivan, Environmental Review Manager, appeared on behalf of Commission staff.

STATEMENT OF THE ISSUES

1. Has Xcel Energy satisfied the criteria established in Minn. Stat. § 216B.243 (2024) and 7849.0120 (2025) for a Certificate of Need for the Project?

2. Has Xcel Energy satisfied the criteria for a site permit set forth in Minn. Stat. § 216E.03 (2022) and Minn. R. 7850.4000, .4100 (2023) for a site permit for the Project?

3. Has Xcel Energy satisfied the criteria established in Minn. Stat. Ch. 216E and Minn. R. Ch. 7850 for a Route Permit for the Transmission Lines?

4. Has Xcel Energy met the criteria for the granting of a Pipeline Routing Permit under the partial exemption pipeline route selection procedures set forth in Minn. Stat. § 216G.02, subd. 3, and Minn. R. 7852.0700, subp. 3 for the Pipeline?

5. Does the environmental assessment (EA) and the record created at the public hearings address the issues identified in the scoping decision?

SUMMARY OF RECOMMENDATIONS

The Judge concludes that Xcel Energy has satisfied the applicable legal requirements, and, accordingly, recommends that the Commission grant a Certificate of Need, Site Permit, Route Permit, and Pipeline Routing Permit under the partial exemption pipeline route selection procedures for the Project, subject to the conditions discussed below. The Judge also recommends the Commission find the EA and hearing record address the issues identified in the October 30, 2025 Scoping Decision.

Based on the Application, EA, comments, proceedings, and other evidence in the record, the Judge makes the following:

FINDINGS OF FACT

I. APPLICANT

1. Northern States Power Company, a Minnesota corporation, doing business as Xcel Energy, is a public utility that generates electrical power, and transmits, distributes, and sells it to residential and business customers within service territories assigned by state regulators in parts of Minnesota, Wisconsin, South Dakota, North Dakota, and the upper peninsula of Michigan.¹

2. Xcel Energy and Northern States Power Company, a Wisconsin corporation, the (NSP Companies), own and operate a five-state integrated Northern States Power System pursuant to the terms of the Federal Energy Regulatory Commission approved Interchange Agreement. The NSP Companies have about 1.8 million electricity customers in the upper Midwest. Xcel Energy owns and operates multiple electric generation facilities serving this area using a variety of technologies and fuels, including coal, natural gas, wind, solar, hydro, refuse derived fuel, and nuclear.

¹ Ex. XCEL-4 (Combined Application for a Certificate of Need, Site Permit, Transmission Line Route Permit, & Partial Exemption and Pipeline Routing Permit for the Lyon County Generating Station Project) (Application) at 14 (May 9, 2025) (eDocket No. 20255-218749-02).

Additional wind, solar, landfill gas, biomass, and hydropower are also included in Xcel Energy's generation portfolio through purchased power agreements.²

II. PROCEDURAL BACKGROUND

3. On March 14, 2025, Xcel Energy filed a request for exemptions from certain content requirements for the CN application.³

4. On March 19, 2025, the Commission issued a Notice of Comment Period on Request for Exemption from Certain CN Filing Requirements scheduling an initial comment period through March 28, 2025, a reply comment period through April 4, 2025, and a supplemental comment period through April 9, 2025.⁴

5. On March 28, 2025, the Office of the Attorney General—Residential Utilities Division (OAG) filed comments regarding the requested exemptions.⁵ The Minnesota Department of Commerce (DOC) also submitted comments.⁶

6. On April 4, 2025, Xcel Energy filed reply comments regarding its exemption requests.⁷

7. On April 9, 2025, the OAG filed supplemental comments responding to Xcel Energy's reply comments.⁸

8. On April 11, 2025, Xcel Energy filed a notice of intent to seek a Site Permit for the proposed Lyon County Generating Station and a Route Permit for two, less than one-mile, single-circuit 345-kilovolt (kV) transmission lines under the alternative permitting procedures of Minn. R. 7850.2800 to 7850.3900.⁹

9. On April 30, 2025, the Commission filed the Staff Briefing Papers providing the Commission with analysis and decision options on Xcel Energy's exemption requests.¹⁰

² Ex. XCEL-4 at 14-15 (Application) (eDocket No. 20255-218749-02).

³ Ex. XCEL-1 (Request for Exemption from Certain Certificate of Need Application Content Requirements) (CN Exemption Request) (March 14, 2025).

⁴ Ex. PUC-1 (Notice of Comment Period for Exemption from Certain Certificate of Need Filing Requirements) (eDocket No. 20253-216578-01) (March 19, 2025).

⁵ Comments of the Office of the Attorney General—Residential Utilities Division (OAG Comments CN Exemptions) (March 28, 2025) (eDocket Nos. 20253-216978-01 to 20253-216978-02).

⁶ Comments of the Minnesota Department of Commerce (DOC Comments CN Exemptions) (March 28, 2025) (eDocket No. 20253-216944-01).

⁷ Ex. XCEL-2 (Reply Comments – Exemption Request) (April 4, 2025) (eDocket No. 20254-217286-01).

⁸ Office of the Attorney General – Residential Utilities Division Letter in Response to Xcel Reply Comments – Exemption Request) (OAG Supplemental Comments CN Exemptions) (April 9, 2025) (eDocket No. 20254-217448-01).

⁹ Ex. XCEL-3 (Notice of Intent to Use Alternative Process) (April 11, 2025) (eDocket No. 20254-217527-01).

¹⁰ Staff Briefing Papers (April 30, 2025) (eDocket No. 20254-218389-01).

10. On May 9, 2025, Xcel Energy filed a Combined Application for a CN, Site Permit, Transmission Line Route Permit, and Partial Exemption and Pipeline Routing Permit for the Project.¹¹

11. On May 13, 2025, the Commission filed a Notice of Comment Period on Application Completeness for the Combined Application. The initial comment period was through June 6, 2025, a reply comment period through June 13, 2025, and a supplemental comment period through June 19, 2025.¹²

12. On May 14, 2025, the Commission issued an order approving Xcel Energy's requested exemptions and data substitutions relating to: Minn. R. 7849.0270 Forecasting; Minn. R. 7849.0280 System Capacity Description; Minn. R. 7849.0290 Conservation Programs; Minn. R. 7849.0300 Consequence of Delay; and Minn. R. 7849.0340 No Facility Alternative. The Commission required Xcel Energy to file updated forecast information when Xcel Energy filed its annual report in PUC docket number E--999/PR-25-11.¹³

13. On June 6, 2025, PUC-EIP¹⁴ and DOC filed comments on application completeness.¹⁵

14. On June 13, 2025, Xcel Energy filed reply comments.¹⁶

15. On June 18, 2025, the OAG and DOC submitted supplemental comments.¹⁷

16. On July 1, 2025, Xcel Energy filed updated sales and demand forecast information pursuant to the Commission's May 14, 2025, Order.¹⁸

17. On July 14, 2025, the Commission issued an order accepting the Combined Application as substantially complete with respect to the permit application completeness requirements. The Commission also required environmental review and hearing

¹¹ Ex. XCEL-4 to 17 (Application and Appendix A-M) (May 9, 2025) (eDocket No. 20255-218749-02 to -17).

¹² Ex. PUC-3 (Notice of Comment Period on Application Completeness) (May 13, 2025) (eDocket No. 20255-218860-01).

¹³ Ex. PUC-4 (Order) (Exemption Order) (May 14, 2025) (eDocket No. 0255-218960-01).

¹⁴ On July 1, 2025, Department of Commerce Energy Environmental Review and Analysis (DOC EERA) staff moved to the Minnesota Public Utilities Commission Energy Infrastructure Permitting (PUC-EIP) unit as directed by state law (Laws of Minn. 2024, ch.126, art. 7). Notice of Legislative Changes (July 9, 2025) (eDocket No. 20257-220799-01). For the purposes of continuity, information submitted by the DOC EERA or the PUC-EIP will be identified as PUC-EIP for all filings.

¹⁵ Ex. EIP-1 (PUC-EIP Comments and Recommendations on Application Completeness) (eDocket No. 20256-219700-01); Ex. EIP-4 (Comments of the Minnesota Department of Commerce) (DOC Comments Application Completeness) (June 6, 2025) (eDocket No. 20256-219697-01 to -02).

¹⁶ Ex. XCEL-20 (Reply Comments – Completeness) (June 13, 2025) (eDocket No. 20256-219889-01 to -02).

¹⁷ Office of the Attorney General—Residential Utilities Division Supplemental Comments (OAG Supplemental Comments Application Completeness) (June 18, 2025) (eDocket No. 20256-220002-01); Supplemental Comments of the Minnesota Department of Commerce (DOC Supplemental Comments Application Completeness) (June 18, 2025) (eDocket No. 20256-219986-01).

¹⁸ Ex. XCEL-22 (Compliance – Updated Sales and Demand Forecast, Public and Trade Secret) (July 1, 2025) (eDocket No. 20257-220582-01 to -02).

processes for the certificate of need and site, route, and pipeline permits jointly, including preparation of an EA in lieu of an environmental report; declined to appoint an advisory task force; and requested a full administrative law judge report with recommendations for the Project's public hearing.¹⁹

18. On July 31, 2025, the Commission issued a Notice of Public Information and EA Scoping Meetings to take place August 11, 2025, from 6:00 p.m. to 9:00 p.m. in-person and on August 12, 2025, at 6:00 p.m. via remote access.²⁰

19. Between July 31, 2025, and August 7, 2025, Xcel Energy published notice of the Public Information and Environmental Assessment Scoping Meetings in the *Tracy Area Headlight Herald* and *Marshall, MN Independent*.²¹

20. On August 11, 2025, the Commission held the in-person public information and scoping meeting in Marshall, MN. One member of the public offered comments at this meeting.²² On August 12, 2025, the Commission held the remote public Information and scoping meeting via WebEx. The public made no comments at this meeting.²³ No site or route alternatives were proposed during the scoping process. Oral comments received at the meeting and written comments submitted after the meeting are discussed below.

21. On August 19, 2025, Lyon County submitted comments.²⁴

22. On August 22, 2025, the Commission issued an order delegating authority to the Executive Secretary to issue an authorization to Xcel Energy to initiate consultation with the Minnesota State Historic Preservation Office (SHPO).²⁵

23. On August 27, 2025, Laborers' International Union of North America Minnesota and North Dakota (LIUNA) filed comments.²⁶ The Minnesota Departments of Resources (DNR) and transportation (MnDOT) also filed comments.²⁷

¹⁹ Ex. PUC -5 (Order) (July 14, 2025) (eDocket No. 20257-220915-01).

²⁰ Ex. PUC-6 (Notice of Public Information and Environmental Assessment Scoping Meetings) (July 31, 2025) (eDocket No. 20257-221587-01).

²¹ Ex. XCEL-23 (Xcel Energy's Scoping Notice Compliance Filing) (Aug. 28, 2025) (eDocket No. 20258-222523-01).

²² Ex. EIP-5 (Transcript of Public Scoping Meeting) (Aug. 11, 2025) (eDocket No. 20258-222404-01).

²³ Ex. EIP-6 (Transcript of Public Scoping Meeting) (Aug. 12, 2025) (eDocket No. 20258-222405-01).

²⁴ Ex. EIP-7 (Lyon County Planning & Zoning – Soil & Water Conservation District Comment Letter) (Aug. 19, 2025) (eDocket No. 20258-222217-01).

²⁵ Ex. PUC-7 (Order) (Aug. 22, 2025) (eDocket No. 20258-222349-01).

²⁶ Ex. EIP-10 (Laborers' International Union of North America Minnesota and North Dakota Comment Letter) ((LIUNA Comment Letter) (Aug. 27, 2025) (eDocket No. 20258-222349-01).

²⁷ Ex. EIP-9 (Minnesota Department of Natural Resources Letter on Scoping) (DNR Comments on Scoping) (Aug. 27, 2025) (eDocket No. 20258-222476-01) and Minnesota Department of Natural Resources Formal Natural Heritage Review - Cover Page (DNR Natural Heritage Review) (Aug. 27, 2025) (eDocket No. 20258-222476-02); Ex. EIP-8 (Minnesota Department of Transportation Comment Letter on Scoping) (MnDOT Comment Letter on Scoping) (Aug. 27, 2025) (eDocket No. 20258-222454-01).

24. On September 5, 2025, PUC-EIP submitted its recommendation to the Commission on EA scoping.²⁸

25. On September 12, 2025, the Administrative Law Judge convened a telephonic prehearing conference with the parties and on September 16, 2025, issued a prehearing order setting the schedule for the proceedings.²⁹

26. On September 29, 2025, PUC-EIP filed an email exchange between Commission staff and Xcel Energy discussing Xcel Energy's decision to remove the evaporative cooling system from the design for the Project.³⁰

27. On October 2, 2025, Xcel Energy filed a letter describing its proposed Project revisions including removal of the evaporative coolers, an updated air permit application, and a change for the emergency diesel generators from three 750-kilowatt (kW) generators to one 1500 kW generator for the Project.³¹

28. On October 8, 2025, the Commission issued a letter authorizing Xcel Energy to initiate consultation with SHPO pursuant to Minn. Stat. § 138.665.³²

29. On October 28, 2025, the Commission issued an order stating that PUC-EIP should solely include the site and route for the Project identified by Xcel Energy in its Combined Application in the EA scoping decision.³³

30. On October 30, 2025, PUC-EIP issued its Notice of Environmental Assessment Scoping Decision (EA Scoping Decision), which set forth the matters proposed to be addressed in the EA and identified certain issues outside the scope of the EA.³⁴

31. On November 24, 2025, the Commission filed a sample routing permit for the construction of a large pipeline and associated facilities; a sample route permit for a high-voltage transmission line and associated facilities; and a sample site permit for a large electric power generating plant (LEPGP).³⁵

²⁸ Ex. EIP-11 (Environmental Assessment Siting and Routing Alternatives) (Sept. 5, 2025) (eDocket No. 20259-222751-01).

²⁹ Prehearing Order (Sept. 16, 2025) (eDocket No. 20259-223053-01).

³⁰ Email RE: Lyon County Generating Station Project - Updated Design Statement (Sept. 29, 2025) (eDocket No. 20259-223391-01).

³¹ Ex. EIP-12 (Xcel Energy's Design Updates for Consideration for the Lyon County Generating Station Project Letter) (Oct. 2, 2025) (eDocket No. 202510-223500-01).

³² Ex. PUC-8 (PUC Authorization to Initiate Consultation under Minn. Stat. § 138.665 Letter) (Oct. 8, 2025) (eDocket No. 202510-223710-01).

³³ Ex. PUC-9 (Order on Including only Site and Route Identified in Application) (Oct. 28, 2025) (eDocket No. 202510-224353-01).

³⁴ Ex. EIP-13 (Notice of Environmental Assessment Scoping Decision) (Scoping Decision) (Oct. 30, 2025) (eDocket No. 202510-224450-01).

³⁵ Ex. EIP-15 (Lyon County Sample Permits) (Sample Permits) (Nov. 24, 2025) (eDocket No. 202511-225235-01).

32. On January 9, 2026, PUC-EIP issued the EA for the Project.³⁶ The Commission filed a notice announcing the availability of the EA and scheduling public hearings on the Application for January 26 and 27, 2026.³⁷

33. On January 12, 2026, Xcel Energy filed the direct testimony of Jessica R. Keller,³⁸ Tyler S. Beemer,³⁹ and Michael D. Aasen.⁴⁰

34. On January 26, 2026, the Administrative Law Judge convened the in-person public hearing in Marshall, MN. Fifty-four exhibits were admitted into the record, including 26 from Xcel Energy, 15 from PUC-EIP, and 13 from the PUC.⁴¹ One member of the public offered comments at this hearing.⁴² On January 27, 2026, the Judge convened the remote public hearing via WebEx. The public made no comments at this hearing.⁴³ Oral comments received at the hearings from the public and written comments submitted after the meeting are discussed below.

35. On February 3, 2026, the Commission filed its 13th exhibit, the PowerPoint from the public hearings.⁴⁴

36. On February 4, 2026, Xcel Energy filed comments in support of the Certificate of Need Combined Application for the Project.⁴⁵

37. On February 5, 2026, the U.S. Environmental Protection Agency, Region 5 stated it did not have comments regarding the EA.⁴⁶

38. On February 9, 2026, Drew Harper and Ian Hedberg submitted written comments regarding the Project.⁴⁷

39. On February 11, 2026, Xcel Energy filed comments regarding the EA and Draft Permits.⁴⁸ The DNR and the Vegetation Management Planning Working Group

³⁶ Ex. EIP-14 (Lyon County Generating Station Project Environmental Assessment) (EA) (Jan. 9, 2026) (eDocket No. 20261-226695-01).

³⁷ Ex. PUC-11 (Notice of Public Hearings and Availability of Environmental Assessment) (Jan. 9, 2026) (eDocket No. 20261-226668-01).

³⁸ Ex. XCEL-26 (Direct Testimony of Jessica R. Keller with Schedule 1) (Keller Direct) (Jan. 12, 2026) (eDocket No. 20261-226770-04).

³⁹ Ex. XCEL-25 (Direct Testimony of Tyler S. Beemer with Schedule 1) (Beemer Direct) (Jan. 12, 2026) (eDocket No. 20261-226770-03).

⁴⁰ Ex. XCEL-24 (Direct Testimony of Michael D. Aasen with Schedule 1) (Aasen Direct) (Jan. 12, 2026) (eDocket No. 20261-226770-02).

⁴¹ Transcript of Public Hearing at 7-8 (Jan. 26, 2026) (eDocket No. 20262-228600-01).

⁴² Transcript of Public Hearing (Jan. 27, 2026) (eDocket No. 20262-228600-02).

⁴³ Transcript of Public Hearing (Jan. 26, 2026) (eDocket No. 20262-228600-01).

⁴⁴ Public Hearing Agenda (Feb. 3, 2026) (eDocket No. 20262-227790-01).

⁴⁵ Xcel Energy Comments in Support of Certificate of Need Public and Trade Secret (Feb. 4, 2026) (eDocket Nos. 20262-227861-01 and 20262-227861-02).

⁴⁶ Environmental Protection Agency Region 5 Comments (Feb. 12, 2026) (eDocket No. 20262-228103-01).

⁴⁷ Comment by Drew Harper (Feb. 9, 2026) (eDocket No. 20262-227948-01); Comment by Ian Hedberg (Feb. 9, 2026) (eDocket No. 20262-227950-01).

⁴⁸ Xcel Energy Environmental Assessment Comments (Feb. 11, 2026) (eDocket No. 20262-228063-01).

(VMPWG) also filed comments regarding the EA and Draft Permits.⁴⁹ The DOC and the OAG filed comments regarding the CN.⁵⁰

40. On February 12, 2026, the Minnesota Pollution Control Agency (PCA) and LIUNA filed written comments regarding the Project.⁵¹

41. On February 18, 2026, Xcel Energy filed reply comments in support of the Certificate of Need for the Project.⁵² The International Brotherhood of Electrical Workers (IBEW) also submitted written comments regarding the Project.⁵³

42. On February 20, 2026, Xcel Energy submitted its Response to Hearing Comments and Proposed Findings of Fact, Conclusions of Law, and Recommendations.⁵⁴

43. On February 23, 2026, after the close of the public comment period, the OAG filed supplemental comments regarding the CN and costs.⁵⁵

44. On February 26, 2026, PUC-EIP filed comments on Xcel Energy's Proposed Findings of Fact.⁵⁶

III. DESCRIPTION OF THE PROJECT

45. The Project will provide firm dispatchable generation to deliver reliable service and meet anticipated energy demands.⁵⁷ Upon completion, the Project will provide a net, nominal generating capacity of approximately 420 megawatts (MW).⁵⁸

46. The Project includes construction and operation of:

⁴⁹ DNR Comment Letter on EA and Draft Permits (Feb. 11, 2026) (eDocket No. 20262-228065-01); Vegetation Management Planning Working Group Comment Letter on EA and Sample Permits (VMPWG Comments) (Feb. 11, 2026) (eDocket No. 20262-228073-01).

⁵⁰ Comments of the Department of Commerce (DOC Comments CN Application) (Feb. 11, 2026) (eDocket No. 20262-228072-01); Initial Comments of the Office of the Attorney General—Residential Utilities Division (OAG Comments Public and Trade Secret CN Application) (Feb. 11, 2026) (eDocket Nos. 20262-228077-01 to -03).

⁵¹ PCA Email regarding EA (Feb. 12, 2026) (eDocket No. 20262-228104-01); LIUNA Comments (Feb. 12, 2026) (eDocket No. 20262-228094-01).

⁵² Xcel Energy Reply Comments in Support of Certificate of Need Public and Trade Secret (Feb. 18, 2026) (eDocket Nos. 20262-228306-01 to -03).

⁵³ International Brotherhood of Electrical Workers Comments on Xcel's Lyon County Generating Station (IBEW Comments) (Feb. 18, 2026) (eDocket Nos. 20262-228580-01).

⁵⁴ Xcel Energy Response to Hearing Comments (Feb. 20, 2026) (eDocket No. 20262-228410-01); Xcel Energy Proposed Findings of Fact, Conclusions of Law, and Recommendations (Xcel Energy Proposed Findings of Fact) (Feb. 20, 2026) (eDocket No. 20262-228410-02).

⁵⁵ Supplemental Comments of the Office of the Attorney General—Residential Utilities Division (OAG Supplemental Comments on CN and Costs Public and Trade Secret) (Feb. 23, 2026) (eDocket Nos. 20262-228506-01 to -03).

⁵⁶ PUC-EIP Comments on Proposed Findings of Fact (Feb. 28, 2026) (eDocket No. 20262-228719-01).

⁵⁷ Ex. EIP-14 at 1 (EA) (eDocket No. 20261-226695-01).

⁵⁸ Ex. XCEL-4 at 1, 4 (Application) (eDocket No. 20255-218749-02).

- Combustion Turbines (Generators, or CTs) and Transmission Lines: Two approximately 210 MW CTs,⁵⁹ and two short transmission line connections;⁶⁰ and
 - Pipeline: An approximately 965-foot natural gas pipeline, consisting of approximately 700 feet of 12-inch diameter pipe and two branches of eight-inch diameter pipe, each connecting to a Generator, and associated facilities (Pipeline). The Pipeline is anticipated to operate at approximately 550 pounds per square inch gauge (psig). The Pipeline will be fed from an existing Northern Border Pipeline Company (Northern Border).⁶¹
47. The Project also includes the following associated facilities:
- On-site operation facilities (administration/control room building and an emergency diesel fire pump building);
 - Two field-erected tanks for the storage of demineralized water and service/fire water;
 - Emergency diesel generators to provide emergency power, with an associated diesel belly tank;
 - One 350-horsepower emergency diesel fire pump to protect against fire, with an associated diesel belly tank; and
 - One 9.9 million British thermal units per hour (MMBtu/hr) water bath heater to heat the natural gas prior to combustion in the two 210 MW CTs.⁶²
48. The expected service life of the Project is approximately 40 years.⁶³

A. Generation Project

49. The generators will be simple-cycle units with dry low-nitrogen oxide (NOx) burners and the use of good combustion practices for emissions control. No additional add-on controls are anticipated.⁶⁴

50. The generators will be equipped with a mechanical clutch system which will allow the generators to function as synchronous condensers to improve grid reliability

⁵⁹ Referred to as the Generation Project.

⁶⁰ Referred to as the Transmission Lines.

⁶¹ Ex. XCEL-4 at 1 (Application) (eDocket No. 20255-218749-02).

⁶² Ex. EIP-14 at 22 (EA) (eDocket No. 20261-226695-01).

⁶³ Ex. XCEL-4 at 17 (Application) (eDocket No. 20255-218749-02).

⁶⁴ Ex. XCEL-4 at 19 (Application) (eDocket No. 20255-218749-02).

when the generators are not required to generate power.⁶⁵ Specifically, the MNEC line will be able to support more than 1,100 MW with the added synchronous condensers.⁶⁶

51. Xcel Energy will operate the generators as peaking units, with an anticipated annual capacity factor of approximately 5-10 percent based on current resource plan modeling. It is expected that the annual availability will be greater than 95 percent.⁶⁷

52. The Company projects energy requirements (gross of rooftop solar) to increase by nearly 12,000 GWh by 2030, from about 43,000 GWh in 2024 to 55,000 GWh in 2030. The increase is primarily driven by new load from data center customers beginning operations in the 2027-29 timeframe.⁶⁸

53. Peak demand (gross rooftop solar) is expected to increase by 1,700 MW by 2030.⁶⁹

B. Transmission Lines

54. The transmission lines will be double circuit 345-kV, originating out of the generation project and will terminate into the Garvin Substation.⁷⁰ The transmission lines will be a combined total length of approximately 4,300 feet.⁷¹

55. Xcel Energy proposes to use single (monopole) steel pole structures for the double circuit configuration. For angles and dead-end structures, Xcel Energy may use a multiple pole design. All structures are proposed to be weatherizing steel. The proposed structures will typically range in height from approximately 90- to 160- feet tall. The spans between structures are anticipated to be about 1,000 feet. Xcel Energy proposed to install structures on a drilled pier concrete foundation usually approximately 30 to 40 feet in depth. Specialty foundations may be required due to geotechnical or soil conditions. Foundation depth will be based on site-specific conditions and detailed engineering design and could be up to 60 to 70 feet in depth.⁷²

56. The Project will have a double circuit transmission line that carries six phases (conductors) and two separate shield wires. Each 345-kV line will utilize bundled (twisted pair) 2x636 kilo circular mils (kcmil) aluminum conductor steel reinforced or

⁶⁵ Ex. XCEL-4 at 4 (Application) (eDocket No. 20255-218749-02).

⁶⁶ Ex. XCEL-4 at 11 (Application) (eDocket No. 20255-218749-02).

⁶⁷ Ex. XCEL-4 at 4 (Application) (eDocket No. 20255-218749-02).

⁶⁸ Ex. XCEL-22, Attachment A at 1 (Compliance – Updated Sales and Demand Forecast, Public and Trade Secret) eDocket No. 20257-220582-01 to -02).

⁶⁹ Ex. XCEL-22, Attachment A at 1 (Compliance – Updated Sales and Demand Forecast, Public and Trade Secret) eDocket No. 20257-220582-01 to -02).

⁷⁰ Ex. XCEL-4 at 25 (Application) (eDocket No. 20255-218749-02).

⁷¹ Ex. EIP-14 at 1 (EA) (eDocket No. 20261-226695-01).

⁷² Ex. XCEL-4 at 25 (Application) (eDocket No. 20255-218749-02).

similar performance conductors. These double bundled conductors will have a capacity equal to or greater than 3,000 amps.⁷³

57. Xcel Energy proposes seeking a 150-foot right-of-way for a 345-kV transmission line. The transmission lines' rights-of-way will be located entirely within the boundaries of the site.⁷⁴

C. Pipeline

58. The Pipeline will interconnect from an existing natural gas pipeline owned by Northern Border. The Pipeline will be approximately 965 feet long and consist of approximately 700 feet of up to 12-inch diameter pipe and two "branches" of up to 10-inch diameter pipe, each connecting to a CT, and associated facilities. The Pipeline is anticipated to operate at approximately 450-550 psig. The Pipeline will include a 150-foot by 150-foot fenced area with a fuel metering station. No right-of-way is contemplated because the entirety of the Pipeline will be located on land that will be owned by Xcel Energy.⁷⁵

59. The Pipeline will be buried to a depth that is compliant with U.S. Department of Transportation pipeline standards (49 CFR § 192.327) and Minn. Stat. § 216G.07, subd. 1, which requires buried depth of at least 4.5 feet within actively cultivated agricultural lands. The depth of cover above the Pipeline is anticipated to be five feet or more.⁷⁶

60. The Pipeline will consist of primarily in-line components including isolation valves, pressure reducing valves to bring down the pressure in the existing Northern Border pipeline from approximately 1,400 psig to a range of 550 to 400 psig, and a natural gas fired water bath heater used to raise the temperature of the natural gas for use in the CTs to approximately 60 degrees Fahrenheit (°F), pending the gas quality.⁷⁷

61. Processed natural gas from the Pipeline will have a design capacity of 150,000 cubic feet per day at minimum flow with a single CT running and 1,075,000 cubic feet per day at maximum flow with two CTs running.⁷⁸

IV. SITE LOCATION AND CHARACTERISTICS

62. The Project is located on two parcels Xcel Energy plans to purchase in Lyon County. The Project Area is approximately 155 acres in size. Permanent impacts will be limited to approximately 30 acres.⁷⁹

⁷³ Ex. XCEL-4 at 25 (Application) (eDocket No. 20255-218749-02).

⁷⁴ Ex. XCEL-4 at 24-5 (Application) (eDocket No. 20255-218749-02).

⁷⁵ Ex. XCEL-4 at 26 (Application) (eDocket No. 20255-218749-02).

⁷⁶ Ex. XCEL-4 at 27 (Application) (eDocket No. 20255-218749-02).

⁷⁷ Ex. XCEL-4 at 27 ((Application) (eDocket No. 20255-218749-02).

⁷⁸ Ex. XCEL-4 at 28 (Application) (eDocket No. 20255-218749-02).

⁷⁹ Ex. XCEL-4 at 1 (Application) (eDocket No. 20255-218749-02).

63. Agriculture is the sole existing land use in the Project Area. The primary crops grown in Lyon County include corn for grain, corn for silage, oats for grain, and wheat for grain. Hogs and pigs are the most prevalent livestock, followed by cattle and calves, sheep and lambs, and poultry.⁸⁰

64. The Project will be adjacent to the proposed Garvin Substation at the southernmost end of the Minnesota Energy Connection Project (MNEC). MNEC is an approximately 180-mile, 345 kV double-circuit transmission line between the existing Sherburne County Generation Station Substation (Sherco Substation) in the city of Becker, Minnesota, and the proposed Garvin Substation reviewed by the Commission in Docket Nos. E002/CN-22-131 and E002/TL-22-132. The Project will interconnect to the grid via MNEC, which will need to be in service for the Project to be operational.⁸¹ The CTs, when acting as synchronous condensers, will enable the MNEC line to support more than 1,100 MW.⁸²

V. PROJECT SCHEDULE

65. The Project in-service date is anticipated in December 2028, assuming construction commences in July 2026.⁸³

66. Xcel Energy requested that the Commission allow it to commence vegetation clearing, topsoil removal, and grading of the site immediately upon issuance of the Site and Route Permits, with the prior submission of certain compliance filings.⁸⁴

VI. SUMMARY OF PUBLIC COMMENTS

67. On March 28, 2025, the OAG filed comments regarding Xcel Energy's requested exemptions from certain CN filing requirements. The OAG opposed one of Xcel Energy's requested exemptions—to file its 2023 forecast from its most recent Integrated Resource Plan (IRP) in lieu of compliance with Minn. R. 7849.0270. The OAG asserted Xcel Energy had conducted more recent forecasting and the Commission should require more updated demand forecasting from Xcel Energy.⁸⁵

68. On March 28, 2025, the DOC also submitted comments recommending approval of the exemptions to CN requirements requested by Xcel Energy.⁸⁶

69. On April 9, 2025, the OAG filed supplemental comments emphasizing that the Commission should require more updated demand forecasting from Xcel Energy.⁸⁷

⁸⁰ Ex. EIP-14 at 88 (EA) (eDocket No. 20261-226695-01).

⁸¹ Ex. XCEL-4 at 1 (Application) (eDocket No. 20255-218749-02).

⁸² Ex. XCEL-4 at 11 (Application) (eDocket No. 20255-218749-02).

⁸³ Ex. XCEL-4 at 4 (Application) (eDocket No. 20255-218749-02).

⁸⁴ Ex. XCEL-24 at 5-6 (Aasen Direct) (eDocket No. 20261-226770-02).

⁸⁵ OAG Comments on CN Exemptions (eDocket Nos. 20253-216978-01 to 20253-216978-02).

⁸⁶ DOC Comments on CN Exemptions (eDocket No. 20253-216944-01).

⁸⁷ OAG Supplemental Comments on CN Exemptions (eDocket No. 20254-217448-01).

70. On June 6, 2025, PUC-EIP filed comments on application completeness recommending the Commission accept the applicant's certificate of need, site, route, and pipeline permit application as substantially complete with respect to the permit application completeness requirements, and that the Commission find the Combined Application to be complete upon submission of the additional forecast data by Xcel Energy. PUC-EIP also recommended against appointment of an advisory task force, and that a full administrative law judge report with recommendations for the Project following public hearing be obtained.⁸⁸

71. On June 18, 2025, the OAG submitted supplemental comments supporting the Commission use of the informal notice and comment process but asking the Commission to make no finding on whether contested issues of fact exist because the finding could hinder record development and undermine the CN process.⁸⁹

72. DOC also submitted supplemental comments on June 18, 2025, stating it continued to recommend the Commission's use of the informal review process and combined review of the Project and various permits.⁹⁰

73. On August 11, 2025, at the in-person public information and scoping meeting, John Bornhoft spoke about the importance of reliable power from Xcel Energy for his business in southwest Minnesota and "whatever we can do to, you know, make that happen, I think that has to be the main focus."⁹¹

74. On August 19, 2025, Lyon County submitted comments requesting support from the Commission to ensure all applicable drainage laws are followed and neighboring land will not suffer negative impact by changes in water runoff during and after construction. County Ditch 29 and County Ditch 24 and their associated drain tiles are located on the property where construction will occur.⁹²

75. On August 27, 2025, LIUNA filed comments on scoping requesting the EA include a close look at the impact of the Project on local employment and economic development.⁹³

76. On the same date, the DNR filed comments regarding potential environmental and wildlife impacts that should be considered in scoping for the EA.⁹⁴ DNR also submitted the results of the Natural Heritage Review for the Project finding the Project would not negatively affect any known occurrences of rare features.⁹⁵ MnDOT

⁸⁸ Ex. EIP-1 (EERA Comments and Recommendations on Application Completeness));

⁸⁹ OAG Supplemental Comments Application Completeness (eDocket No. 20256-220002-01).

⁹⁰ DOC Supplemental Comments Application Completeness (eDocket No. 20256-219986-01).

⁹¹ Ex. EIP-5 (Transcript of Public Scoping Meeting) (Aug. 11, 2025) at 23-24 (eDocket No. 20258-222404-01).

⁹² Ex. EIP-7 (Lyon County Planning & Zoning – Soil & Water Conservation District Comment Letter) (eDocket No. 20258-222217-01).

⁹³ Ex. EIP-10 (LIUNA Comment Letter) (Aug. 27, 2025) (eDocket No. 20258-222349-01).

⁹⁴ Ex. EIP-9 (DNR Comments on Scoping) (eDocket No. 20258-222476-01).

⁹⁵ Ex. EIP-9 (DNR Natural Heritage Review) (eDocket No. 20258-222476-02).

also submitted comments regarding impacts to the US 59 right-of-way, stormwater ponds, and traffic control.⁹⁶

77. On September 5, 2025, PUC-EIP submitted its recommendation on EA scoping that the Commission authorize PUC-EIP to include solely the site and route for the Project identified by Xcel Energy in its combined application in the EA scoping decision.⁹⁷

78. On January 26-27, 2026, Judge Mortenson presided over public hearings on the Application for the Project via in-person and remote means, respectively.⁹⁸ Commission staff and representatives from Xcel Energy were present. Joe Vandendriessche, a landowner with a residence next door to the Project provided comments raising concerns about traffic noise levels and Project traffic on township gravel roads. Vandendriessche also asked about water usage of the Project and any effect on his well.⁹⁹ No members of the public spoke during the remote-access public hearing held on January 27, 2026.¹⁰⁰

79. On February 8, 2026, Drew Harper submitted written comments expressing his extreme disappointment that Xcel Energy was requesting approval for two new natural gas-fired turbines because the turbines are inconsistent with Minnesota's 2040 carbon-free electricity standard and would cause decades of additional environmental and climate damage. Additionally, Harper questioned the costs of the Project compared with renewable electricity.¹⁰¹

80. On February 9, 2026, Ian Hedberg submitted written comments stating the proposal to build new fossil fuel infrastructure was a bad idea. Hedberg asserted he "thought Xcel wanted to be seen as part of the transition away from fossil fuels."¹⁰²

81. On February 9, 2026, PCA submitted a comment reminding the Commission that an approved Total Maximum Daily Load 1/9/2023 for E.coli and Total Suspended Solids for the Cottonwood River north of the Project was in place. In addition, directly to the West of the Project location, a tributary stream—County Ditch 29 flows directly to the Cottonwood River.¹⁰³

82. On February 11, 2026, DOC filed written comments regarding the CN recommending the Commission grant the CN with a recommendation on the cost cap. DOC stated the text of the CN and IRP Order allows any costs that were prudent and caused by events outside Xcel's control to be recovered. DOC reviewed Xcel Energy's

⁹⁶ Ex. EIP-8 (MnDOT Comment Letter on Scoping) (eDocket No. 20258-222454-01)..

⁹⁷ Ex. EIP-11 (PUC-EIP Environmental Assessment Siting and Routing Alternatives) (eDocket No. 20259-222751-01).

⁹⁸ Transcript of Public Meeting (Jan. 26, 2026) (eDocket No. 20262-228600-01); Transcript of Public Meeting (Jan. 27, 2026) (eDocket No. 20262-228600-02).

⁹⁹ Transcript of Public Meeting (Jan. 26, 2026) at 17-21(eDocket No. 20262-228600-01).

¹⁰⁰ Transcript of Public Meeting (Jan. 27, 2026) (eDocket No. 20262-228600-01).

¹⁰¹ Comment by Drew Harper (eDocket No. 20262-227948-01).

¹⁰² Comment by Ian Hedberg (eDocket No. 20262-227950-01).

¹⁰³ PCA Email regarding EA (eDocket No. 20262-228104-01).

language requests on the cost cap language regarding events outside of Xcel's control. DOC recommended the Commission clarify that the existing cost cap allows for reductions in pricing due to government actions to be reflected in the cost cap.¹⁰⁴

83. On February 11, 2026, the OAG filed comments regarding the CN. The OAG pointed out that "the estimated cost of this project is now essentially double the price of Xcel's original May 2024 bid. This is before factoring in financing costs, which Xcel has not quantified. Xcel has provided very little support for these runaway costs, and what little support it did provide appears contradictory." The OAG asks the Commission to impose stronger cost discipline on the Project and order Xcel Energy assign the majority of the costs to very large customers.¹⁰⁵

84. On February 11, 2026, DNR submitted comments regarding the EA and Draft Permits stating the Project may require a General Permit for Temporary Appropriation for water appropriations and to contact DNR. DNR also supported permit condition 5.3.10 on development of a Vegetation Management Plan (VMP) of the Draft Route Permit for the transmission lines. In addition, DNR recommends a special condition Route Permit for the pipeline and the Site Permit similar to permit condition 5.3.10. The special condition should direct Xcel Energy to develop a VMP for all areas that do not contain permanent facilities within the project footprint.¹⁰⁶

85. On February 11, 2026, the VMPWG also filed comments supporting permit condition 5.3.10. In addition, VMPWG recommended adapting permit condition 5.3.10 to a special permit condition requiring the applicant to develop a vegetation management plan for all areas not used for permanent facilities within the entire project footprint and included proposed special condition permit language.¹⁰⁷

86. On February 12, 2026, LIUNA submitted comments supporting the Project as "a critical reliability tool, providing both dispatchable capacity and voltage support needed to firm large additions of variable wind and solar generation."¹⁰⁸

87. On February 18, 2026, the International Brotherhood of Electrical Workers (IBEW) submitted written comments supporting the Project as "critical to maintain reliability and support the large additions of variable wind and solar energy on the electric grid that will be built in southwest Minnesota over the next decades."¹⁰⁹

88. On February 23, 2026, the OAG filed supplemental comments regarding the CN and OAG's recommendations to assign the incremental costs of Lyon County to very large customers and to condition the CN on either a hard cost cap at the cost

¹⁰⁴ DOC Comments CN Application. (eDocket No. 20262-228072-01).

¹⁰⁵ OAG Comments Public and Trade Secret CN Application (eDocket Nos. 20262-228077-01 to -03).

¹⁰⁶ DNR Comment Letter on EA and Sample Permits (eDocket No. 20262-228065-01).

¹⁰⁷ VMPWG Comments eDocket No. 20262-228073-01).

¹⁰⁸ LIUNA Comments (eDocket No. 20262-228094-01).

¹⁰⁹ IBEW Comments (eDocket Nos. 20262-228580-01).

estimate in Xcel Energy's May 2025 CN filing or on allowing recovery of a return only of the cost of debt for costs above Xcel's October 2024 Stipulation cost estimate.¹¹⁰

89. On February 26, 2026, PUC-EIP filed comments recommending modifications to Xcel Energy's Draft Permits.¹¹¹ The details of PUC-EIP's comments are discussed below.

VII. XCEL ENERGY'S RESPONSES TO COMMENTS

90. On April 4, 2025, Xcel Energy submitted reply comments regarding its CN exemption requests. Xcel Energy proposed providing the Commission with a revised load forecast reflecting analysis from the fall 2024 forecast through 2040.¹¹²

91. On June 13, 2025, Xcel Energy filed reply comments requesting the Commission determine Xcel Energy's Combined Application to be complete and that no contested issues of fact exist regarding the Combined Application. Xcel Energy also requested the Commission consider the requested CN under the informal process pursuant to Minn. R. 7829.1200, the Site and Route Permits under the alternative review process, and the Pipeline Routing Permit under the partial exemption from the pipeline route selection procedures.¹¹³

92. On February 4, 2026, Xcel Energy filed comments in support of the Certificate of Need Combined Application for the Project. Xcel Energy noted that the Project costs have increased, but the increase is within a range similar to comparable project cost increases. Xcel Energy stated it would continue to evaluate and implement measures to avoid and minimize additional Project cost increases, and the Project team would conducting ongoing assessment of remaining cost risks¹¹⁴

93. On February 18, 2026, Xcel Energy filed reply comments in support of the Certificate of Need for the Project. Xcel Energy responds to the OAG's concerns about the Project.¹¹⁵

94. On February 20, 2026, Xcel Energy submitted its Response to Hearing Comments.¹¹⁶

¹¹⁰ OAG Supplemental Comments on CN and Costs Public and Trade Secret (eDocket Nos. 20262-228506-01 to -03).

¹¹¹ PUC-EIP Comments on Proposed Findings of Fact (eDocket No. 20262-228719-01).

¹¹² Ex. XCEL-2 (Reply Comments – Exemption Request) (eDocket No. 20254-217286-01).

¹¹³ Ex. XCEL-20 (Reply Comments – Completeness) (eDocket No. 20256-219889-01 to -02).

¹¹⁴ Xcel Energy Comments in Support of Certificate of Need Public and Trade Secret (eDocket Nos. 20262-227861-01 and 20262-227861-02).

¹¹⁵ Xcel Energy Reply Comments in Support of Certificate of Need Public and Trade Secret (eDocket Nos. 20262-228306-01 to -03).

¹¹⁶ Xcel Energy Response to Hearing Comments (eDocket No. 20262-228410-01).

CERTIFICATE OF NEED

I. CERTIFICATE OF NEED CRITERIA

95. Pursuant to Minn. Stat. § 216B.243, all “large energy facilities” must receive a certificate of need from the Commission prior to construction.¹¹⁷ A “large energy facility” is defined, in relevant part, as “any electric power generating plant or combination of plants at a single site with a combined capacity of 50,000 kilowatts or more and transmission lines directly associated with the plant that are necessary to interconnect the plant to the transmission system.”¹¹⁸

96. The Project qualifies as a “large energy facility” as defined by Minn. Stat. § 216B.2421, subd 2(1) (2022), and a “large electric generating facility” (LEGF) as defined by Minn. R. 7849.0010, subp. 13 (2023). Accordingly, the Project requires a certificate of need from the Commission.

97. Minn. Stat. § 216B.243 and Minn. R. 7849.0010 - .2100 (2023) set forth the criteria for issuance of a certificate of need. The Commission has established criteria to assess the need for a CN for a LEGF in Minn. R. 7849.0120.

98. The factors listed under each of the criteria set forth in Minn. R. 7849.0120 must be evaluated to the extent the Commission considers them applicable and pertinent to a proposed facility.¹¹⁹

99. There is sufficient evidence in the record for the Judge to assess the Project and apply the legal criteria and factors to make recommendation to the Commission.

II. APPLICATION OF CERTIFICATE OF NEED CRITERIA TO THE PROJECT

A. The Probable Result of Denial Would be an Adverse Effect on the Future Adequacy, Reliability, or Efficiency of Energy Supply to the Applicant, to the Applicant’s Customers, or to the People of Minnesota and Neighboring States, Considering Minn. R. 7849.0120(A)

100. The first of the criteria established by the Commission for the granting of a CN calls for an examination of whether “the probable result of denial would adversely affect the future adequacy, reliability, or efficiency of energy supply to the applicant, to the applicant’s customers, or to the people of Minnesota and neighboring states.”¹²⁰

101. The Commission issued an Order approving Xcel Energy data exemption requests but also requiring Xcel Energy to file updated forecast information when Xcel

¹¹⁷ See also Minn. R. 7849.0030 (requiring a certificate of need for “large electric generating facilities” as defined in Minn. R. 7849.0010, subp. 13).

¹¹⁸ Minn. Stat. § 216B.2421, subd. 2(1).

¹¹⁹ Minn. R. 7849.0100.

¹²⁰ Minn. R. 7849.0120(A).

Energy filed its annual report in PUC docket number E-999/PR-25-11.¹²¹ The approved exemptions and alternative data requirements affect the analysis for the CN criteria as discussed in detail below.

1. Accuracy of the Applicant's Forecast of Demand

102. Pursuant to Minn. R. 7849.0120 (A)(1), the Commission must consider “the accuracy of the applicant's forecast of demand for the type of energy that would be supplied by the proposed facility.” This factor relates to Minn. Stat. § 216B.243, subd. 3(1), which requires the Commission, in assessing need, to consider “the accuracy of the long-range energy demand forecasts on which the necessity for the facility is based.”

103. The Commission exempted Xcel Energy regarding data substitutions relating to Minn. R. 7849.0270 Forecasting; Minn. R. 7849.0280 System Capacity Description; and Minn. R. 7849.0300 Consequence of Delay. As an alternative, the Commission required Xcel Energy to file updated forecast information when Xcel Energy filed its annual report in PUC docket number E-999/PR-25-11.¹²²

104. On July 1, 2025, Xcel Energy filed updated sales and demand forecast information pursuant to the Commission’s May 14, 2025, Order.¹²³

105. The need for the Project is based upon a number of factors. First, the need is based upon the Company’s forecasted energy and demand requirements. Second, the outcome of the capacity expansion modeling in the IRP. Third, Xcel Energy’s energy exposure analysis.¹²⁴

106. Regarding the first need, the DOC analyzed Xcel Energy’s forecast in detail in the IRP Docket and concluded that “Xcel’s energy and capacity forecasts are reasonable pending the submission of additional information.”¹²⁵ After Xcel Energy updated its sales and demand forecast information, DOC concluded that the “updated forecasts are either within the forecast band used in the IRP or are actually above the upper band” used in the IRP and are reasonable.¹²⁶

107. Regarding the second need, the outcome of the capacity expansion modeling in the IRP, the size of the need identified by each of the modeling parties far exceeds the capacity of the proposed Project. The Fall 2024 Forecast and the Spring 2025 Forecast are either within the forecast range studied in the IRP or above it.

¹²¹ Ex. PUC-4 (Exemption Order) (eDocket No. 0255-218960-01).

¹²² Ex. PUC-4 (Exemption Order) (eDocket No. 0255-218960-01).

¹²³ Ex. XCEL-22 (Compliance – Updated Sales and Demand Forecast, Public and Trade Secret). (eDocket No. 20257-220582-01 to -02).

¹²⁴ PUC-EIP Comments and Recommendations on Application Completeness at 7-8 (eDocket No. 20256-219700-01).

¹²⁵ See *In the Matter of Xcel Energy’s 2024–2040 Upper Midwest Integrated Resource Plan*, EERA Comments CN Application, MPUC Docket No. Docket No. E002/RP-24-67 (Aug. 9, 2024), (eDocket No. 20248-209394-02, 20248-209394-04 at 101).

¹²⁶ DOC Comments Application Completeness at 8-9 (eDocket No. 20256-219697-01 to -02).

Therefore, DOC concluded that the Company has substantial peaking capacity needs and the more recent forecasts do not change that conclusion. The proposed Project can fulfill at least some of the peaking needs.¹²⁷

108. Regarding the third need, Xcel Energy's energy exposure analysis, as a dispatchable resource the proposed Project will enable the Company to reduce its exposure to spot market pricing. The updated forecasts would not reduce Xcel Energy's energy exposure. Therefore, DOC concluded that Xcel Energy has a need to reduce exposure to spot market pricing.¹²⁸

109. The OAG asserted that the need for the Project was due to data centers.¹²⁹ The need for this Project stems from the 2019 IRP, and large load customers, like data centers, are significant and one of several factors driving projected energy need.¹³⁰ A significant need is the replacement of retiring coal fueled generators.¹³¹

110. The Judge finds that Xcel Energy's forecast of demand for the type of energy that would be supplied by the proposed facility is reasonable, accurate, and demonstrates the need for the Project. This factor demonstrates the probable result of denial would be an adverse effect upon the future adequacy, reliability, and efficiency of electricity.

2. Applicant's Existing or Expected Conservation Programs

111. The Commission's Order exempted Xcel Energy from providing information on conservation programs and Minn. R. 7849.0290.¹³²

3. Promotional Practices of Applicant that May Have Given Rise to the Increase in Energy Demand

112. Minn. R. 7849.0120(A)(3) requires consideration of the effects of promotional practices of the applicant that may have given rise to the increase in energy demand, particularly promotional practices which have occurred since 1974. This factor relates to Minn. Stat. § 216B.243, subd. 3(4), which requires the Commission, in assessing need, to consider "promotional activities that may have given rise to the demand for this facility."

113. There is no evidence in the record that Xcel Energy had programs promoting the sale of electricity that would have given rise to the demand for this facility. This supports granting the CN.

¹²⁷ DOC Comments Application Completeness at 9 (eDocket No. 20256-219697-01 to -02).

¹²⁸ DOC Comments Application Completeness at 9 (eDocket No. 20256-219697-01 to -02).

¹²⁹ OAG Comments Public and Trade Secret CN Application at 1 (eDocket Nos. 20262-228077-01 to -03).

¹³⁰ Ex. XCEL-4 at 29-34 (Application) (eDocket No. 20255-218749-02); Xcel Energy Reply Comments in Support of Certificate of Need Public and Trade Secret at 3-4 (eDocket No. 20262-227861-01).

¹³¹ Ex. XCEL-4 at 33 (Application) (eDocket No. 20255-218749-02); Xcel Energy Reply Comments in Support of Certificate of Need Public and Trade Secret at 3 (eDocket No. 20262-227861-01).

¹³² Ex. PUC-4 (Exemption Order) (eDocket No. 0255-218960-01).

4. Ability of Current Facilities and Planned Facilities Not Requiring a Certificate of Need to Meet the Future Demand

114. Minn. R. 7849.0120(A)(4) requires consideration of “the ability of current facilities and planned facilities not requiring certificates of need to meet the future demand.” This factor relates, in part, to Minn. Stat. § 216B.243, subd. 3(6), which requires the Commission, in assessing need, to consider “possible alternatives for satisfying the energy demand or transmission needs including but not limited to potential for increased efficiency and upgrading of existing energy generation and transmission facilities, load-management programs, and distributed generation.”

115. The DOC examined current and planned facilities not requiring certificates of need and concluded they will not be able to meet the future demand.¹³³ This factor supports granting the CN.

5. The Effect of the Proposed Facility, or a Suitable Modification, in Making Efficient Use of Resources

116. Minn. R. 7849.0120(A)(5), requires consideration of “the effect of the proposed facility, or a suitable modification thereof, in making efficient use of resources.”

117. The long-term impacts to the Project Area will be limited to an approximately 30-acre footprint of current industrial-use farmland.¹³⁴

118. The Project will be adjacent to the proposed Garvin Substation at the southernmost end of the MNEC.¹³⁵ The Project will interconnect to the grid using Xcel Energy’s existing interconnection rights at the Sherco Substation.¹³⁶

119. The CTs are efficient, lower greenhouse gas (GHG)-emitting generation units that will be operated using good combustion practices for emissions control. They are necessary to provide firm dispatchable energy in near real time. The CTs will operate as synchronous condensers when not generating electricity to improve grid reliability and permit increased renewable energy load on the MNEC transmission line.¹³⁷

120. Consideration of this factor supports granting the CN.

6. Finding regarding consideration of the criterion at Minn. R. 7849.0120(A)

121. Based on the consideration of the five factors in Minn. R. 7849.0120(A), the probable result of denial of the CN would be an adverse effect upon the future adequacy,

¹³³ DOC Comments CN Application at 11 (eDocket No. 20262-228072-01).

¹³⁴ Ex. XCEL-4 at 1 (Application) (eDocket No. 20255-218749-02).

¹³⁵ Ex. XCEL-4 at 1 (Application) (eDocket No. 20255-218749-02).

¹³⁶ DOC Comments CN Application at 11 (eDocket No. 20262-228072-01).

¹³⁷ Ex. XCEL-4 at 4 (Application) (eDocket No. 20255-218749-02).

reliability, and efficiency of energy supply to meet future renewable energy obligations and for the people of Minnesota and neighboring states.

B. A More Reasonable and Prudent Alternative to the Proposed Facility Has Not Been Demonstrated

122. A certificate of need must be granted to an applicant on determining that “a more reasonable and prudent alternative to the proposed facility has not been demonstrated by a preponderance of the evidence on the record.” This factor relates to Minn. Stat. § 216B.243, subd. 3(6), which requires the Commission, in assessing need, to consider “possible alternatives for satisfying the energy demand or transmission needs including but not limited to potential for increased efficiency and upgrading of existing energy generation and transmission facilities, load-management programs, and distributed generation.”

123. The Commission concluded it was more likely than not that Xcel Energy would need up to 800 MWs of firm dispatchable resources in the 2027-2029 timeframe. The Project is the most cost-effective alternative to be part of the efforts to meet that need, which will also include purchased power.¹³⁸

124. Xcel Energy examined the following alternatives for new generating facilities and drew the following conclusions which the Judge finds reasonable:

- *Distributed generation (DG)*: Xcel Energy reviewed the costs of both solar DG and thermal DG and concluded that they would be cost prohibitive.¹³⁹
- *Renewable Energy*: Xcel Energy concluded that “based on EnCompass simulations, renewable generation alternatives, by itself does not meet the capacity need for firm dispatchable generation.”¹⁴⁰
- *Battery Energy Storage System (BESS)*: Xcel Energy determined that currently available and economically competitive BESS technology has duration constraints. Xcel Energy would have energy shortfalls, and would be reliant on the market to purchase an average of more than 62,000 MWh per year.¹⁴¹
- *Demand-Side Management (DSM)*: Xcel Energy concluded that “We modeled [energy efficiency] and [demand response] as supply-side resource that were available to meet load serving needs. Additions of

¹³⁸ Ex. XCEL-4 at 35 (Application) (eDocket No. 20255-218749-02); DOC Comments CN Application at 12 (eDocket No. 20262-228072-01).

¹³⁹ Ex. XCEL-4 at 36 (Application) (eDocket No. 20255-218749-02).

¹⁴⁰ Ex. XCEL-4 at 37 (Application) (eDocket No. 20255-218749-02).

¹⁴¹ Ex. XCEL-4 at 37 (Application) (eDocket No. 20255-218749-02).

[energy efficiency] and [demand response] were approved by the Commission but were not substitutes for the firm dispatchable need.”¹⁴²

- *New Transmission*: Xcel Energy concluded that transmission was not a viable alternative because there are no existing resources that it could access via transmission and new transmission could not meet the required in-service date.¹⁴³

1. Appropriateness of the Size, Type, and Timing of the Proposed Facility Compared to a Reasonable Alternative

125. Minn. R. 7849.0120(B)(1) requires consideration of “the appropriateness of the size, type, and timing of the proposed facilities relative to reasonable alternatives.”

126. The Project is approximately 420 MW in size.¹⁴⁴

127. Based upon the size of the need identified in the IRP analysis and Commission approval of the Settlement Agreement, DOC proposes that the size, type and timing of the proposed Project is not excessive and is reasonable.¹⁴⁵

128. Consideration of this factor supports granting the CN.

2. The Cost of the Proposed Facility and Energy to Be Supplied by the Proposed Facility compared to Reasonable Alternatives

129. Minn. R. 7849.0120(B)(2) requires consideration of “the cost of the proposed facility and the cost of the energy to be supplied by the proposed facility as compared to the costs of the reasonable alternatives and the cost of energy that would be supplied by reasonable alternatives.”

130. As mentioned above, DOC noted that while other peaking alternatives exist and could meet Xcel’s need in terms of size, type, and timing, such alternatives had the opportunity to be bid into the 800 MW firm dispatchable CN proceeding. Therefore, DOC concluded that the size, the type, and the timing of the proposed Project, as compared to those alternatives, is reasonable. The Commission selected the proposed Project as a least cost resource.¹⁴⁶

131. Since filing its Application, Although Xcel Energy estimates higher labor costs than initially contemplated for this geography, Xcel Energy explained that the selected site location has significant cost advantages from the perspective of gas supply costs, reuse of the Sherco generator interconnection, and offsetting additional

¹⁴² Ex. XCEL-4 at 38 (Application) (eDocket No. 20255-218749-02).

¹⁴³ Ex. XCEL-4 at 38 (Application) (eDocket No. 20255-218749-02).

¹⁴⁴ Ex. XCEL-4 at 4 (Application) (eDocket No. 20255-218749-02).

¹⁴⁵ DOC Comments CN Application at 13-4 (eDocket No. 20262-228072-01).

¹⁴⁶ DOC Comments CN Application at 15 (eDocket No. 20262-228072-01).

synchronous condensers that would otherwise be necessarily purchased for the Garvin Substation.¹⁴⁷

132. As part of its evaluation of the Project's cost, Xcel Energy compared the updated Project cost to other CT projects. That analysis shows that the updated cost estimate for the Project falls within the range of other recently proposed projects on a \$/kW basis. While these are similar projects, the details of scope (dual fuel, SCRs, network upgrades, repower, etc.) impact variations in cost.¹⁴⁸

Project Name	Utility	Nameplate Capacity	Estimated In-Service Date	\$/kW
R.M. Schahfer Generating Station	Northern Indiana Public Service Company	400 MW	2027	Trade Secret ¹⁴⁹
NIPSCO RM Schahfer – CT Project	Northern Indiana Public Service Company	400 MW	2026	Trade Secret
Lyon County Generating Station	Xcel Energy	420 MW	2028	Trade Secret
Urquhart Replacement Unit	Dominion Energy South Carolina	200 MW	2028	Trade Secret
Cayuga Combined Cycle	Duke Energy	1,476 MW	2029/30	Trade Secret

133. CT projects continue to experience cost increases. The Company's estimated cost for this Project is in line with the market, which has seen unprecedented cost increases over the past two years. But the Project's location has significant cost

¹⁴⁷ Xcel Energy Comments in Support of Certificate of Need Public and Trade Secret at 8 (eDocket Nos. 20262-227861-01 and 20262-227861-02).

¹⁴⁸ Xcel Energy Comments in Support of Certificate of Need Public and Trade Secret at 8 (eDocket Nos. 20262-227861-01 and 20262-227861-02).

¹⁴⁹ See Xcel Energy Comments in Support of Certificate of Need Public and Trade Secret, Attachment A at 2 (eDocket No. 20262-227861-01).

advantages from the perspective of gas supply costs, reuse of the Sherco generator interconnection, and offsetting additional synchronous condensers that would otherwise be needed for the Garvin Substation.¹⁵⁰

134. Xcel Energy is continuing to evaluate and implement measures to avoid and minimize additional Project cost increases. However, having pricing finalized for the CTs, transformers, and EPC contract is a significant step in reducing cost risk, and the Company's current cost estimate for the Project includes an 8.5 percent contingency, which is lower than typical.¹⁵¹

135. The OAG criticizes the Project's cost estimate. However, the OAG does not argue that the legal criteria for granting a Certificate of Need are unmet.¹⁵²

136. With respect to cost, more specifically, Minn. Stat. § 216B.243 requires:

- The applicant must show that “demand for electricity cannot be met more cost effectively through energy conservation and load management measures.”¹⁵³ Here, the Application includes a detailed alternatives analysis. Both the Company and DOC concluded that conservation and load management are not substitutes for the firm dispatchable need that will be met by the Project.¹⁵⁴
- For nonrenewable generators, the applicant assesses “the risk of environmental costs and regulation” on the proposed facility.¹⁵⁵ The Company provided detailed information regarding its analysis and DOC concluded that this requirement has been adequately addressed.¹⁵⁶
- The Commission may not issue a Certificate of Need for a nonrenewable generator unless the applicant demonstrates it has “explored the possibility of generating power by means of renewable energy sources and has demonstrated that the alternative selected is less expensive. . . .”¹⁵⁷ Section 5 of the Application discusses the alternatives (including renewable generation) Xcel Energy considered for the Project before concluding that renewable generation, on its own, does not meet the capacity need for firm

¹⁵⁰ Xcel Energy Comments in Support of Certificate of Need Public and Trade Secret at 9 (eDocket Nos. 20262-227861-01 and 20262-227861-02).

¹⁵¹ Xcel Energy Comments in Support of Certificate of Need Public and Trade Secret at 9 (eDocket Nos. 20262-227861-01 and 20262-227861-02).

¹⁵² OAG Comments Public and Trade Secret CN Application at 8-19 (eDocket Nos. 20262-228077-01 to -03).

¹⁵³ Minn. Stat. § 216B.243, subd. 3.

¹⁵⁴ *E.g.*, Ex. XCEL-4 at § 5.5 (Application) (eDocket No. 20255-218749-02); DOC Comments CN Application at 15 (eDocket No. 20262-228072-01). Minn. R. 7849.0120(B)(2) similarly requires an alternatives analysis that includes cost as one of its considerations. Here, too, the Department concluded that there is no alternative or combination of alternatives that would meet the identified need that would be expected to have a lower cost. DOC Comments CN Application at 15 (eDocket No. 20262-228072-01).

¹⁵⁵ Minn. Stat. § 216B.243, subd. 3(12).

¹⁵⁶ DOC Comments CN Application at 23 (eDocket No. 20262-228072-01).

¹⁵⁷ Minn. Stat. § 216B.243, subd. 3a.

dispatchable generation.¹⁵⁸ The Department agreed that “renewable generation is not a reasonable alternative.”¹⁵⁹

137. The OAG makes two broad criticisms of the Company’s cost estimate. First, the OAG criticizes the overall increase to the Project costs. Second, the OAG suggests that the Company has not been transparent about various aspects of its costs.¹⁶⁰ Xcel Energy responded to these criticisms in its Reply Comments.¹⁶¹

138. With respect to the increase in Project costs, Xcel Energy stated that initial proposals for the Project were required in January 2024—nearly two and a half years before the Project could potentially receive its Certificate of Need. Since that time, the power market has experienced cost escalation, particularly in the demand for simple-cycle CTs, engineering services, and construction labor necessary to place projects into service. Independent industry consultants have reported that simple-cycle project \$/kW costs have nearly doubled over this same period. As evidence of these increases, Xcel Energy included in its Reply Comments a white paper study discussing the cost challenges of similar sized simple cycle CT projects from 2022-2025.¹⁶²

139. The Project’s updated cost estimate is within the range of similar projects being built across the country, despite these industry-wide pressures. Although the OAG asserts that the two most “comparable” projects are cheaper on a \$/kW basis, Xcel Energy clarified that these comparisons overlook four significant differences.¹⁶³

- A. *In-Service Dates.* The two projects cited by the OAG have in-service dates 12 to 35 months earlier than the Project. Earlier delivery materially reduces exposure to inflationary pressures in equipment, materials, and labor markets.¹⁶⁴
- B. *Equipment Procurement Timing and Price Escalation.* To meet these earlier in-service dates, those projects would have secured turbine equipment well in advance of the Project here. Over the past four years, turbine pricing has increased.¹⁶⁵
- C. *Brownfield Development Advantages.* The OAG’s cited projects are brownfield/redeveloped existing generating sites, benefiting from existing

¹⁵⁸ E.g., Ex. XCEL-4 at § 5.5 (Application) (eDocket No. 20255-218749-02).

¹⁵⁹ DOC Comments CN Application at 19 (eDocket No. 20262-228072-01).

¹⁶⁰ OAG Comments Public and Trade Secret CN Application at 4-9 (eDocket Nos. 20262-228077-01 to -03).

¹⁶¹ Xcel Energy Reply Comments in Support of Certificate of Need Public and Trade Secret. (eDocket Nos. 20262-228306-01 to -03).

¹⁶² Xcel Energy Reply Comments in Support of Certificate of Need Public and Trade Secret at 5 (eDocket Nos. 20262-228306-01 to -03).

¹⁶³ Xcel Energy Reply Comments in Support of Certificate of Need Public and Trade Secret at 5 (eDocket Nos. 20262-228306-01 to -03).

¹⁶⁴ Xcel Energy Reply Comments in Support of Certificate of Need Public and Trade Secret at 5 (eDocket Nos. 20262-228306-01 to -03).

¹⁶⁵ Xcel Energy Reply Comments in Support of Certificate of Need Public and Trade Secret at 5-6 (eDocket Nos. 20262-228306-01 to -03).

site utilities, established operations and maintenance facilities, onsite warehouse capacity, and construction efficiency from sequential unit installation. Although there are other advantages to the location of the Project, as a greenfield site, the Project does not realize these structural cost advantages, making direct cost comparisons inaccurate.¹⁶⁶

- D. *Synchronous Condenser Capability.* The Project includes clutch-enabled synchronous condenser capability, resulting in a modest cost premium for the turbines and balance of plant. This capability is projected to *avoid* approximately \$120 million in costs for two standalone synchronous condensers at the Garvin Substation. The projects cited by OAG do not provide this system-critical function.¹⁶⁷

140. Xcel Energy likewise responded to the OAG's suggestion that the record lacks information regarding cost drivers and the Company's efforts to control costs.¹⁶⁸

- A. *Allowance for Funds Used during Construction (AFUDC).* Xcel Energy acknowledged that its January 2024 materials did not specifically call out AFUDC. However, contrary to the OAG's characterization, AFUDC was explicitly identified in Appendix K to the Certificate of Need application, and Xcel Energy has continued to provide updated AFUDC estimates, including in its supplemental response to OAG Information Request (IR) No. 2, which was included with the Company's Reply Comments.¹⁶⁹
- B. *Geotechnical Costs.* As reflected in Xcel Energy's November filings, deep foundations were initially listed as \$0 in the May cost estimate, because a site-specific geotechnical study had not yet been performed. Since the time of application, Xcel Energy received the geotechnical study from the neighboring Garvin Substation site, which indicated that deep foundations were likely. This was confirmed when the Project completed geotechnical investigations in November 2025.¹⁷⁰
- C. *Tariff Impacts.* Federal tariff volatility in Q1–Q2 2025 created significant uncertainty for turbine suppliers and EPC contractors. Suppliers would not commit to tariff-inclusive pricing, material origin was uncertain, making tariff exposure difficult to quantify, and Xcel Energy was required to make reasonable assumptions regarding tariff risk. Regarding the CT pricing specifically, the Company's Application reflected a higher preliminary

¹⁶⁶ Xcel Energy Reply Comments in Support of Certificate of Need Public and Trade Secret at 6 (eDocket Nos. 20262-228306-01 to -03).

¹⁶⁷ Xcel Energy Reply Comments in Support of Certificate of Need Public and Trade Secret at 6 (eDocket Nos. 20262-228306-01 to -03).

¹⁶⁸ Xcel Energy Reply Comments in Support of Certificate of Need Public and Trade Secret) at 7 (eDocket Nos. 20262-228306-01 to -03).

¹⁶⁹ Xcel Energy Reply Comments in Support of Certificate of Need Public and Trade Secret at 7 (eDocket Nos. 20262-228306-01 to -03).

¹⁷⁰ Xcel Energy Reply Comments in Support of Certificate of Need Public and Trade Secret at 7 (eDocket Nos. 20262-228306-01 to -03).

estimate, which ultimately decreased at contract execution once tariff risk language was finalized.¹⁷¹

- D. *Contingency.* Xcel Energy explained that overall Project contingency has been reduced, not increased, because key equipment contracts (turbines, transformers, breakers) were executed by Xcel Energy in 2025, and Xcel Energy and its EPC contractor have established a stable, expected contract value.¹⁷²
- E. *Clutch System Development.* GE Vernova expects that the Project's turbines will be the first F Class CT units in the country to operate with integrated clutch-enabled synchronous condenser capability. This is an industry-first deployment. As the design has progressed, previously unknown requirements have been identified, including an additional transformer and related materials, and increased cooling loads requiring larger air-cooled heat exchangers-cooled heat exchangers. Xcel Energy asserted that this functionality continues to be essential to support the addition of hundreds of MW of renewable generation on MNEC and avoids approximately \$120 million in separate transmission equipment costs.¹⁷³

141. Overall, the Application included the estimated Project cost and the components of that estimate. Xcel Energy's Comments provided information regarding the cost of the Project, including the results of a detailed bottoms-up cost estimate and the factors influencing Project costs, and further comments included additional detail in response to the OAG's comments. In addition, Xcel Energy provided additional information to the OAG regarding the cost estimate in response to discovery, and those responses are also now part of this record.

142. The record evidence satisfies the legal criteria for a Certificate of Need. There is no evidence in this record contradicting or refuting this information, and the record contains substantial evidence supporting the updated cost estimate.¹⁷⁴

143. The OAG also proposed three potential cost recovery conditions.¹⁷⁵ Xcel Energy opposed the conditions, asserting that they are outside the scope of a Certificate of Need proceeding and noting that the OAG did not cite authority for the asserted conditions. Because there is record evidence regarding the Project's cost estimate, and because the OAG's proposed conditions implicate persons or parties who are not

¹⁷¹ Xcel Energy Reply Comments in Support of Certificate of Need Public and Trade Secret at 7 (eDocket Nos. 20262-228306-01 to -03).

¹⁷² Xcel Energy Reply Comments in Support of Certificate of Need Public and Trade Secret at 7-8 (eDocket Nos. 20262-228306-01 to -03).

¹⁷³ Xcel Energy Reply Comments in Support of Certificate of Need Public and Trade Secret at 8 (eDocket Nos. 20262-228306-01 to -03).

¹⁷⁴ Xcel Energy Reply Comments in Support of Certificate of Need Public and Trade Secret at 8 (eDocket Nos. 20262-228306-01 to -03).

¹⁷⁵ OAG Comments Public and Trade Secret CN Application at 13-20 (eDocket Nos. 20262-228077-01 to -03).

involved in this proceeding, the record does not support imposition of the conditions identified by the OAG.¹⁷⁶

144. Despite the OAG's cost criticisms, the OAG did not dispute the need for the Project or identify an alternative to the Project.¹⁷⁷

145. DOC concluded that there is no reasonable alternative or combination of alternatives that would be expected to have a lower cost.¹⁷⁸

146. The record contains detailed evidence regarding the estimated cost of the Project. The record demonstrates that the cost of the Project is reasonable and that no alternative to the Project exists to meet the identified need for firm dispatchable generation.

147. Consideration of this factor supports granting the CN.

3. Effects of the Proposed Facility on the Natural and Socioeconomic Environments Compared to Reasonable Alternatives

148. Minn. R. 7849.0120(B)(3) requires consideration of "the effects of the proposed facility upon the natural and socioeconomic environments compared to the effects of reasonable alternatives."

149. DOC determined that no reasonable alternative or combination of alternatives exist that would be more reasonable and prudent. Therefore, no analysis of the impact of alternatives is necessary.¹⁷⁹

150. Consideration of this factor supports granting the CN.

4. Expected Reliability of the Proposed Facility Compared to Reasonable Alternatives

151. Minn. R. 7849.0120(B)(4) requires consideration of "the expected reliability of the proposed facility compared to the expected reliability of reasonable alternatives." This sub-factor relates, in part, to Minn. Stat. § 216B.243, subd. 3(9), which requires consideration of "the benefits of enhanced regional reliability, access, or deliverability to the extent these factors improve the robustness of the transmission system or lower costs for electric consumers in Minnesota."

¹⁷⁶ Xcel Energy Reply Comments in Support of Certificate of Need Public and Trade Secret at 8-9 (eDocket Nos. 20262-228306-01 to -03).

¹⁷⁷ See generally OAG Comments Public and Trade Secret CN Application (eDocket Nos. 20262-228077-01 to -03).

¹⁷⁸ DOC Comments CN Application at 15 (eDocket No. 20262-228072-01).

¹⁷⁹ DOC Comments CN Application at 15 (eDocket No. 20262-228072-01).

152. DOC found that no reasonable alternative or combination of alternatives that would be more reasonable and prudent exists. Therefore, no reliability analysis of the alternatives is necessary.¹⁸⁰

153. Consideration of this factor supports granting the CN.

5. The Project Satisfies the Criterion at Minn. R. 7849.0120(B)

154. The Judge recommends that based on consideration of the four factors in Minn. R. 7849.0120(B), a more reasonable and prudent alternative to the proposed facility has not been demonstrated by a preponderance of the evidence in the record. Therefore, this criterion supports granting of a CN.

C. The Proposed Facility, or a Suitable Modification of the Facility, Will Provide Benefits to Society in a Manner Compatible with Protecting the Natural and Socioeconomic Environments, Including Human Health

1. The Relationship between the Proposed Facility or Suitable Modification to Overall State Energy needs

155. Minn. R. 7849.0120(C)(1) requires consideration of “the relationship of the Project, or a suitable modification thereof, to overall state energy needs.”

156. The Energy Policy and Conservation Quadrennial Report, 2024 (Quad Report) states that, “[a]s renewable capacity grows to capture a greater share of Minnesota’s power market, utilities will need more fast-ramping resources to maintain system balance, given the variable and non-dispatchable nature of solar and wind power capacity.”¹⁸¹ While the Quad Report proceeds to discuss energy storage, CT units such as the proposed Project can provide the same services to the grid.

157. Two members of the public, Harper and Hedberg, asserted the Project was inconsistent with Minnesota’s 2040 carbon-free electricity standard and building new fossil fuel infrastructure is a bad idea.¹⁸²

158. Xcel Energy responded that the Project is designed to minimize carbon emissions and support the reliable integration of renewable energy generation. Xcel explained that after the Project is in-service, it will conduct a feasibility study to evaluate

¹⁸⁰ DOC Comments CN Application at 15 (eDocket No. 20262-228072-01).

¹⁸¹ See *Energy Policy and Conservation Quadrennial Report*, Minnesota Department of Commerce, at 118 (2024) available at <https://mn.gov/commerce-stat/energy/EnergyPolicyandConservationQuadrennialReport2024.pdf>.

¹⁸² Comment by Drew Harper (eDocket No. 20262-227948-01); Comment by Ian Hedberg (eDocket No. 20262-227950-01).

pathways to convert the Project to combust 100 percent carbon-free generation or identify another pathway to transition the unit to zero emissions by January 1, 2040.¹⁸³

159. DOC recommended that the proposed Project will have substantial benefits for meeting overall state energy needs as identified in the Quad Report.¹⁸⁴

160. The Project fits the state's overall energy needs and consideration of this factor supports granting the CN.

2. The Effects of the Proposed Facility or a Suitable Modification Upon the Natural and Socioeconomic Environments Compared to Not Building the Facility

161. Minn. R. 7849.0120(C)(2) requires consideration of “the effects of the proposed facility, or a suitable modification thereof, upon the natural and socioeconomic environments compared to the effects of not building the facility.”

162. The no build alternative for the Project would avoid some human and environmental impacts. Nonetheless, the no build alternative would also fail to provide the additional up to 800 MWs of firm dispatchable resources to meet electrical demand.¹⁸⁵

163. Consideration of this factor supports granting the CN.

3. The Effects of the Proposed Facility or a Suitable Modification in Inducing Future Development

164. Minn. R. 7849.0120(C)(3) requires consideration of “the effects of the proposed facility, or a suitable modification thereof, in inducing future development.”

165. The Project will supply Xcel Energy with firm dispatchable generation needed to continue to reliably serve customers after the retirement of the Company's few remaining coal-fired units. Likewise, because of the stability support the Project would provide to MNEC, the Project will help to facilitate over a thousand megawatts of new renewable generation on Xcel Energy's system.¹⁸⁶

166. Consideration of this factor supports granting the CN.

4. The Socially Beneficial Uses of the Output of the Proposed Facility or a Suitable Modification Including Its Uses to Protect or Enhance Environmental Quality

167. Minn. R. 7849.0120(C)(4) requires consideration of “the socially beneficial uses of the output of the proposed facility, or a suitable modification thereof, including its

¹⁸³ Xcel Energy Reply Comments in Support of Certificate of Need Public and Trade (eDocket Nos. 20262_228306-01 to -03).

¹⁸⁴ DOC Comments CN Application at 16 (eDocket No. 20262-228072-01).

¹⁸⁵ Ex. XCEL-4 at 45 (Application) (eDocket No. 20255-218749-02).

¹⁸⁶ Ex. XCEL-4 at 12 (Application) (eDocket No. 20255-218749-02).

uses to protect or enhance environmental quality.” This sub-factor relates to Minn. Stat. § 216B.243, subd. 3(5), which, in relevant part, requires the Commission to consider “the benefits of this facility, including its uses to protect or enhance environmental quality....”

168. Because it would support Xcel Energy’s ability to provide reliable electric service to its customers, the Project helps to ensure continued economic vitality in the areas Xcel Energy serves.¹⁸⁷

169. Consideration of this factor supports granting the CN.

D. The Record Does Not Demonstrate That the Project Will Fail to Comply with Relevant Policies, Rules, and Regulations

170. Minn. R. 7849.0120(D) requires that “the design, construction, or operation of the proposed facility, or a suitable modification of the facility” will not “fail to comply with relevant policies, rules, and regulations of other state and federal agencies and local governments.” This factor relates to Minn. Stat. § 216B.243, subd. 3(7), which requires the Commission, in assessing need, to consider “the policies, rules, and regulations of other state and federal agencies and local governments.”

171. The Project must comply with all relevant policies, rules, and regulations. Xcel Energy will secure all necessary permits and authorizations for the Project.¹⁸⁸ The Commission can ensure state and local legal requirements for water drainage are met by Xcel in cooperation with the relevant authorities.

172. Consideration of this factor supports granting the CN.

E. Conclusion on Minnesota Rule 7849.0120 Criteria

173. Considering all the factors under each of the four criteria specified in Minn. R. 7849.0120, the Judge recommends the Commission find:

1. The probable result of denial of the CN will be an adverse effect upon the future adequacy, reliability, and efficiency of energy supply for Xcel Energy, and the people of Minnesota and neighboring states;
2. There has been no showing of a more reasonable and prudent alternative to the Project;
3. The Project will provide benefits to society in a manner compatible with protecting the natural and socioeconomic environments, including human health; and

¹⁸⁷ Ex. XCEL-4 at 13 (Application) (eDocket No. 20255-218749-02).

¹⁸⁸ Ex. XCEL-4 at 13 (Application) (eDocket No. 20255-218749-02); DOC Comments CN Application at 17 (eDocket No. 20262-228072-01).

4. The record does not demonstrate that the design, construction, or operation of the Project will fail to comply with relevant policies, rules, and regulations of other state and federal agencies and local governments.

SITE PERMIT

I. SITE PERMIT CRITERIA

174. Large electric power generating plants (LEPGP) are governed by Minn. Stat. § 216E (2024) and Minn. R. 7850.1000 - .5600 (2025). Minn. Stat. § 216E.01, subd. 5, defines an LEPPG as “electric power generating equipment and associated facilities designed for or capable of operation at a capacity of 50,000 kilowatts or more.”

175. During the 2024 legislative session, the Minnesota Legislature revised and recodified the PPSA in Chapter 216I. However, those revisions did not become effective until July 1, 2025, after the Combined Application was filed.¹⁸⁹

176. On April 11, 2025, Xcel Energy filed a notice of intent to seek a Site Permit for the proposed Lyon County Generating Station and a Route Permit for two, less than one-mile, single-circuit 345-kilovolt (kV) transmission lines under the alternative permitting procedures of Minn. R. 7850.2800 to 7850.3900.¹⁹⁰ On October 28, 2025, the Commission issued an order stating that PUC-EIP Staff should solely include the site and route for the Project identified by Xcel Energy in its Combined Application in the EA scoping decision.¹⁹¹

177. A LEPPG powered by natural gas is eligible for the alternative permitting process authorized by Minn. Stat. § 216E.04. Xcel Energy filed the Application under the process established by the Commission in Minn. R. 7850.2800-.3900 (2025).

178. Under Minn. Stat. § 216E.04, for a LEPPG permitted under the alternative permitting process, PUC-EIP prepares an EA containing information on the human and environmental impacts of the proposed project and addresses mitigating measures.

179. When deciding whether to issue a Site Permit, the Commission considers the 15 factors set forth in Minn. Stat. § 216E.03, subd. 7. There is sufficient evidence in the record to assess the Project using these criteria and factors.

II. APPLICATION OF SITE PERMIT CRITERIA TO THE GENERATION PROJECT

180. The EA analyzed the potential impacts of the Project on human and environmental resources within specific regions of influence (RI). The RI is the geographic

¹⁸⁹ 2024 Minn. Laws ch. 126, Art. 7, §§ 14 – 16.

¹⁹⁰ Ex. XCEL-3 (Notice of Intent to Use Alternative Process) (eDocket No. 20254-217527-01).

¹⁹¹ Ex. PUC-9 (Order on Including only Site and Route Identified in Application) (eDocket No. 202510-224353-01).

area where the Project might exert some influence and is used as the basis for assessing potential impacts.¹⁹²

A. Human Settlement

181. The impacts to human settlements resulting from the Generation Project are anticipated to be minimal to moderate.¹⁹³

1. Displacement

182. There are no residential or non-residential structures (e.g., agricultural outbuildings or animal product structures), churches, schools, daycares, or nursing homes located within the Project Area. The closest residence is 865 feet south of the Project Area. Therefore, there will be no displacement of residential or non-residential structures as a result of the Generation Project.¹⁹⁴

2. Noise

183. The PCA has established standards for regulating noise levels. The land use activities associated with residential, commercial, and industrial land have been grouped together into Noise Area Classifications (NACs). The limits are expressed as a range of permissible dBA within a one-hour period; L50 is the dBA that may be exceeded by 50 percent (30 minutes) of the time within an hour, while L10 is the dBA that may be exceeded by 10 percent (six minutes) of the time within an hour. Residences, which are typically considered sensitive to noise, are classified as NAC-1.¹⁹⁵

184. A sound study was conducted for the Generation Project to identify the applicable noise regulations and create an acoustic model for the Generation Project.¹⁹⁶

185. The primary noise-generating equipment for this project is expected to operate as a steady sound source during operation and can operate day and night. Additionally, there are two emergency generators on-site which will likely undergo occasional testing and have potential to operate in the event of an emergency condition. Testing is expected to occur only during the daytime hours and could last approximately 30 minutes at a time. Emergency use for the generators would only be while the combustion turbine equipment was not operating.¹⁹⁷

186. Landowner Vandendriessche raised concerns about noise levels from the Project.¹⁹⁸ Xcel Energy explained that the modeling showed the Project noise level will be a 50-decibel band width north of the Vandendriessche home. This decibel level is

¹⁹² Ex. EIP-14 at 48 (EA) (eDocket No. 20261-226695-01).

¹⁹³ Ex. EIP-14 at 50 (EA) (eDocket No. 20261-226695-01).

¹⁹⁴ Ex. XCEL-4 at 54 (Application) (eDocket No. 20255-218749-02).

¹⁹⁵ Ex. EIP-14 at 55 (EA) (eDocket No. 20261-226695-01).

¹⁹⁶ Ex. EIP-14 at 55 (EA) (eDocket No. 20261-226695-01).

¹⁹⁷ Ex. EIP-14 at 54-56 (EA) (eDocket No. 20261-226695-01).

¹⁹⁸ Transcript of Public Meeting (Jan. 26, 2026) at 17-21 (eDocket No. 20262-228600-01).

similar to a refrigerator running. The CTs will be running primarily in the peak of summer and peak of winter, as needed.¹⁹⁹

187. Impacts due to noise are anticipated to be minimal. According to the project-specific noise study, project sound levels will comply with Minnesota noise standards. Xcel Energy plans to minimize noise from the Generation Project by using low-noise upgrades to the exhaust stack exits and the air-cooled heat exchanges.²⁰⁰

188. In the Draft Site Permit, Section 4.2.7 addresses noise.²⁰¹

3. Aesthetics

189. The Generation Project is in an industrial-agricultural setting. There is existing utility infrastructure including the Northern Border pipeline and Highway 59 right-of-way. Additionally, the Garvin Substation and MNEC transmission line are planned utility infrastructure within the immediate vicinity. The Generation Project would result in more industrial aesthetics becoming a part of the landscape.²⁰²

190. The Lyon County Generating Station CT stacks are estimated to be around 87 feet tall with the transmission line structures at approximately 90 to 160 feet in height. The proposed development for the MNEC Project will also include structures of a similar height next to the Generation Project.²⁰³

191. There are no Minnesota Scenic Byways near the Project Area. There are recreational activities within the local vicinity of the Project Area, like snowmobile trails, public lands and parks.²⁰⁴

192. There are no residences located within the Project area, but two residences are within 2,000 feet of the project area, with the closest residence located 865 feet south of the project area. The second closest residence is located approximately 1,668 feet east of the project area.²⁰⁵

193. In the Draft Site Permit, Section 4.2.8 addresses aesthetics.²⁰⁶

4. Land Use and Zoning

194. According to the Lyon County Zoning Ordinance, the entire Project Area and surrounding parcels are zoned as agricultural. Part of the purpose of the agricultural district is to provide a district that will allow extensive areas of the county to be retained

¹⁹⁹ Transcript of Public Meeting (Jan. 26, 2026) at 19 (eDocket No. 20262-228600-01).

²⁰⁰ Ex. EIP-14 at 59 (EA) (eDocket No. 20261-226695-01).

²⁰¹ Ex. EIP-14, Appendix D at 4 (Draft Site Permit) (eDocket No. 20261-226695-01).

²⁰² Ex. EIP-14 at 50 (EA) (eDocket No. 20261-226695-01).

²⁰³ Ex. EIP-14 at 53 (EA) (eDocket No. 20261-226695-01).

²⁰⁴ Ex. EIP-14 at 50 (EA) (eDocket No. 20261-226695-01).

²⁰⁵ Ex. EIP-14 at 50 (EA) (eDocket No. 20261-226695-01).

²⁰⁶ Ex. EIP-14, Appendix D at 5 (Draft Site Permit) (eDocket No. 20261-226695-01).

in agricultural use and to secure economy in governmental expenditures for public services, utilities, and schools.²⁰⁷

195. Impacts from the Generation Project are anticipated to be negligible. The land use near the Project Area is not expected to change as a result of the Generation Project. Permanent impacts are limited to the Project Area, which will be owned by Xcel Energy. The Project is consistent with authorized uses within the agricultural district and is compatible with future land use planning goals.²⁰⁸

196. The Project Area is entirely on land in an industrial-agriculture area that will be owned by Xcel Energy, with no neighboring properties' land use being affected. Construction and operation of the Project will be contained within the Project Area.²⁰⁹

5. Cultural Values

197. The Project is located in an industrial-agricultural area within Lyon County and is surrounded by mostly agricultural and rural land. Farming and the ability to continue to farm and support livelihoods through farming tend to be strong regional values. There are natural amenities, including lakes, rivers, and wildlife areas within the county that offer opportunities for fishing, hunting, and other recreational activities. Nearby Garvin County Park encompasses approximately 750 acres of wooded hills, prairie, and stream corridors. The park includes wooded trails, camp sites, a tubing hill, and other opportunities for recreation.²¹⁰

198. The Project's impact on cultural values is anticipated to be minimal. The Project will not adversely impact the work of residents and employees that underlie the area's cultural values, nor is it anticipated to adversely impact geographical features that inform these values. Xcel Energy is committed to continuing to coordinate with Tribal Nations that may have an interest in the Generation Project, including the Upper Sioux Community and Lower Sioux Indian Community.²¹¹

199. The Project will be limited to a discrete area and is sited to avoid impacting public participation in community and regional events. Impacts on cultural values are anticipated to be minimal; no mitigation measures are proposed.²¹²

6. Recreation

200. Recreational activities available near the Project Area include snowmobiling, hunting, and fishing, as well as activities on state-managed lands. Snowmobiling is the nearest recreational activity to the Project Area, with segments of the Lyon County Snowmobile Trail paralleling US Highway 59. The nearest managed public lands for recreational purposes is the Garvin Wildlife Management Area (WMA) to

²⁰⁷ Ex. EIP-14 at 60 (EA) (eDocket No. 20261-226695-01).

²⁰⁸ Ex. EIP-14 at 60 (EA) (eDocket No. 20261-226695-01).

²⁰⁹ Ex. EIP-14 at 60 (EA) (eDocket No. 20261-226695-01).

²¹⁰ Ex. EIP-14 at 62 (EA) (eDocket No. 20261-226695-01).

²¹¹ Ex. EIP-14 at 62 (EA) (eDocket No. 20261-226695-01).

²¹² Ex. EIP-14 at 62 (EA) (eDocket No. 20261-226695-01).

the west of the Project Area. The Garvin WMA offers opportunities for viewing and hunting deer, small game, and pheasants. Garvin County Park is located approximately 2.5 miles north of the Project along the Cottonwood River. The nearest Minnesota State Park is Lake Shetek State Park, approximately 8 miles south of the Project Area.²¹³

201. The Project will have no notable impacts to recreation. Potential impacts during construction will be limited to non-winter months. Thus, there will be no impact on snowmobiling.²¹⁴ No mitigation measures are proposed related to recreation.²¹⁵

7. Socioeconomics

202. Project construction is anticipated to begin in July 2026, with the full Project in service in December 2028. The Project will generate minor, short-term positive economic impacts, driven by increased construction activity and a small influx of contractor employees. Local businesses may experience short-term positive economic impacts through the use of the hotels, restaurants, and other services used by contractors during construction.²¹⁶

203. Project construction is expected to employ approximately 300 to 400 construction workers. The Project workers will likely commute to the Project Area over the 30 to 33 months of construction on either a daily or weekly basis. This may result in a temporary increase in need for temporary housing, but it is not expected to affect the availability of permanent or rental housing. Temporary lodging is primarily available in Marshall, about 16 miles north of the Project Area.²¹⁷

204. Xcel Energy has committed to a construction workforce consisting primarily of union labor personnel. The Project will create local job opportunities for various trade professionals who live and work in the area. Opportunities will also exist for subcontracting to local contractors for various construction positions. Additional personal income will also be generated by the circulation and recirculation of dollars paid out by the Project as business expenditures and state and local taxes.²¹⁸

205. In the long term, the Project will benefit the local tax base by generating property taxes. Additionally, long-term benefits will include permanent job creation and may result in the relocation of Project personnel to the area. The presence of additional workers and increased employment for Project operations could result in a slight increase in the population but would be accommodated by current retail staffing.²¹⁹

²¹³ Ex. EIP-14 at 93 (EA) (eDocket No. 20261-226695-01).

²¹⁴ Ex. EIP-14 at 93 (EA) (eDocket No. 20261-226695-01).

²¹⁵ Ex. EIP-14 at 93 (EA) (eDocket No. 20261-226695-01).

²¹⁶ Ex. EIP-14 at 63 (EA) (eDocket No. 20261-226695-01).

²¹⁷ Ex. EIP-14 at 63 (EA) (eDocket No. 20261-226695-01).

²¹⁸ Ex. EIP-14 at 63 (EA) (eDocket No. 20261-226695-01).

²¹⁹ Ex. EIP-14 at 63 (EA) (eDocket No. 20261-226695-01).

206. Any socioeconomic impacts are anticipated to be positive; therefore, no mitigation is proposed.²²⁰

8. Environmental Justice

207. Environmental justice (EJ) is the fair treatment of all people with respect to the development and enforcement of environmental laws, regulations, and policies. Fair treatment implies that no particular population should be forced to shoulder a disproportionate share of exposure to the negative effects of pollution due to lack of political or economic strength.²²¹

208. In Minnesota, EJ areas are defined as census tracts:

- 40 percent or more of the area's total population is nonwhite;
- 35 percent or more households in the area have an income that is at or below 200 percent of the federal poverty level;
- 40 percent or more of the area's residents over the age of five have limited English proficiency; or
- The area is located within Indian country, as defined in 18 U.S.C. § 1151.²²²

209. The Project Area is not within an identified EJ area, and there are no EJ areas within one mile of the Project. The Project Area is also not located within Indian Country.²²³

210. It is not anticipated that the Project would adversely or disproportionately impact EJ areas of concern. Therefore, no mitigation measures are proposed.²²⁴

9. Public Service and Infrastructure

(1) Transportation.

211. The Project is located in a rural area north of Garvin, Minnesota. Roads within the RI include US Highway 59 (US 59) and 120th street. The Lyon County Generation Station is approximately 0.8 miles south of US 14. The Project runs adjacent to US 59 for approximately 0.3 miles. Access to the Lyon County Generating Station will be from US 59. The Lyon County Generation Station site and associated transmission

²²⁰ Ex. EIP-14 at 63 (EA) (eDocket No. 20261-226695-01).

²²¹ Ex. EIP-14 at 64 (EA) (eDocket No. 20261-226695-01).

²²² Minn. Stat. § 216B.1691, subd. 1(e) (Supp. 2025).

²²³ Ex. EIP-14 at 64 (EA) (eDocket No. 20261-226695-01).

²²⁴ Ex. EIP-14 at 66 (EA) (eDocket No. 20261-226695-01).

lines would not cross any roads.²²⁵ There are no passenger rail service or rail freight lines in the RI.²²⁶

212. Impacts to transportation would be limited to those associated with construction equipment and delivery vehicles accessing the site via US 59. The equipment and material deliveries generated by construction are estimated to be approximately 900 truckloads over the approximately 30-month period of construction. This traffic would result in a temporary 18 percent increase in traffic along US Highway 59 south of CSAH 14 during construction activities. All necessary provisions would be made to conform to safety requirements for maintaining the flow of public traffic.²²⁷

213. The Project may lead to temporary traffic delays, detours, and congestion during construction due to the movement of oversized equipment or deliveries to the Project. Temporary road or lane closures may occur during the construction process for safety purposes. Construction would not be occurring in the road right-of-way, so once equipment is moved, there would be no further impacts.²²⁸

214. Landowner Vandendriessche asked about Project traffic on township gravel roads.²²⁹ During construction, Xcel plans to avoid the gravel roads as much as possible except in emergencies.²³⁰

215. During Project operations, the workforce and support services will generate an approximate maximum of 10 additional vehicle trips per day. No impacts on area roads will occur from operations.²³¹

216. Oversized/overweight load permits must be obtained from the MnDOT when size and/or weight limits are exceeded. Xcel Energy will coordinate with township road supervisors or county highway departments to document existing road conditions and address any issues that arise during construction with roadways to ensure the roads are adequately restored, if necessary, after construction is complete.²³²

(2) *Public Utilities.*

217. Electric utility services in and around the Project Area are provided by Xcel Energy and the Lyon-Lincoln Electric Coop. The Project will not disturb electric utilities and thus no disruptions to electrical service are anticipated.²³³

²²⁵ The transmission line connects to the Garvin substation which is on the Project site. The substation connects to the MNEC, which is not part of this proceeding. See e.g. Ex. EIP-14 at 117 (EA) (eDocket No. 20261-226695-01).

²²⁶ Ex. EIP-14 at 66 (EA) (eDocket No. 20261-226695-01).

²²⁷ Ex. EIP-14 at 67 (EA) (eDocket No. 20261-226695-01).

²²⁸ Ex. EIP-14 at 67 (EA) (eDocket No. 20261-226695-01).

²²⁹ Transcript of Public Meeting (Jan. 26, 2026) at 17-21 (eDocket No. 20262-228600-01).

²³⁰ Transcript of Public Meeting (Jan. 26, 2026) at 18 (eDocket No. 20262-228600-01).

²³¹ Ex. EIP-14 at 67 (EA) (eDocket No. 20261-226695-01).

²³² Ex. EIP-14 at 67-68 (EA) (eDocket No. 20261-226695-01).

²³³ Ex. EIP-14 at 68 (EA) (eDocket No. 20261-226695-01).

218. During construction, Xcel will minimize any disruption to public services or public utilities. To the extent disruptions to public services or public utilities occur these will be temporary, and Xcel will restore service promptly. Where any impacts to utilities have the potential to occur, Xcel will work with both landowners and local agencies to determine the most appropriate mitigation measures. Xcel Energy will use the Gopher State One-Call system to locate and mark all underground utilities to avoid potential impacts.²³⁴

(3) *Emergency Services.*

219. The Lyon County Sheriff's Office, headquartered in Marshall, Minnesota, provides emergency response. For fire response, the Project is located within Fire Region 9, the West Central Region, and fire services for the area are provided by the Balaton Fire Department and the Tracy Fire Department.²³⁵

220. Ambulance services are provided by Tracy Ambulance and the Balaton Fire Department for the Project Area. Emergency medical response facilities include Sanford Tracy Emergency Services and the Murray County Hospital, the closest of which is Sanford Tracy Emergency Services in Tracy, Minnesota, approximately 9 miles from the Project Area.²³⁶

221. The Project is not anticipated to impact emergency services. Temporary closings are not expected to have significant impacts on public services and access in the area because of the rural nature of the area and subsequent low traffic levels on most roads. The use of US 59 for large equipment or material deliveries would be coordinated with local jurisdictions to provide safe access for police, fire, and other emergency service vehicles.

222. Any accidents that occur during the Project's construction will be handled through local emergency services. Given the limited number of construction workers involved in the Project and the low probability of a construction related accident, the current emergency services are expected to have ample capacity to address any potential emergencies that may occur during Project construction.²³⁷

223. In the Draft Site Permit, Section 8.12 addresses emergency services.²³⁸

(4) *Airports.*

224. There are no public or private airports located within one mile of the Project. Thus, impacts to airports are not anticipated. The nearest airport is Tracy Municipal, north of the town of Tracy and approximately nine miles from the Project Area.²³⁹

²³⁴ Ex. EIP-14 at 68 (EA) (eDocket No. 20261-226695-01).

²³⁵ Ex. EIP-14 at 68 (EA) (eDocket No. 20261-226695-01).

²³⁶ Ex. EIP-14 at 68 (EA) (eDocket No. 20261-226695-01).

²³⁷ Ex. EIP-14 at 69 (EA) (eDocket No. 20261-226695-01).

²³⁸ Ex. EIP-14, Appendix D at 15 (Draft Site Permit) (eDocket No. 20261-226695-01).

²³⁹ Ex. EIP-14 at 69 (EA) (eDocket No. 20261-226695-01).

225. The Project has been sited to avoid interference with the safe operation of existing public airports and private airstrips. Xcel Energy will coordinate with the FAA for appropriate notifications associated with Project construction as necessary.²⁴⁰

226. No impacts to airports are anticipated; therefore, no mitigation measures are proposed.²⁴¹

B. Effects on Public Health and Safety

227. The Generation Project has the potential to negatively impact public health and safety during Project construction and operation. Potential health and safety impacts include injuries due to falls, equipment use, and electrocution.²⁴²

228. Xcel Energy plans to take measures to deter any unauthorized public involvement with construction and operation of the Project. During construction, additional security will be provided to guard equipment and prevent vandalism. Other safety measures include a complete fire protection system. The Project will also be designed in compliance with state, NESC, and Xcel Energy standards regarding clearance to ground, clearance to crossing utilities, clearance to buildings, and strength of materials. Xcel Energy construction crews and contract crews will comply with state, NESC, and Xcel Energy standards regarding installation of facilities and standard construction practices.²⁴³

C. Land-based Economics

1. Agriculture

229. Industrial agriculture is the sole existing land use in the Project Area. The primary crops grown in Lyon County include corn for grain, corn for silage, oats for grain, and wheat for grain. In terms of livestock, hogs and pigs are the most prevalent, followed by cattle and calves, sheep and lambs, and poultry.²⁴⁴

230. The Project will permanently convert 149.3 acres of cultivated cropland into non-industrial agriculture land use. This conversion will have a minimal impact on the availability of the agricultural land in Lyon County, as agricultural production will continue in the surrounding areas during both the construction and operational phases of the Generation Project. The Generation Project must avoid or mitigate the increase of water runoff flowing into County Ditch 29 and County Ditch 24 through Xcel cooperation and coordination with water and soil authorities during construction and operation of the Generation Project.²⁴⁵

²⁴⁰ Ex. EIP-14 at 69-70 (EA) (eDocket No. 20261-226695-01).

²⁴¹ Ex. EIP-14 at 70 (EA) (eDocket No. 20261-226695-01).

²⁴² Ex. EIP-14 at 70 (EA) (eDocket No. 20261-226695-01).

²⁴³ Ex. EIP-14 at 51-52 (Application) (eDocket No. 20255-218749-02).

²⁴⁴ Ex. EIP-14 at 88 (EA) (eDocket No. 20261-226695-01).

²⁴⁵ Ex. EIP-14 at 88 (EA) (eDocket No. 20261-226695-01).

231. Minnesota R. 7850.4400, subp. 4, prohibits the siting of a LEPGP where more than 0.5 acres of prime farmland is occupied per MW of net generating capacity. The generation capacity of the proposed CTs totals 420 MW. At this capacity, the 149.3 acres of prime farmland converted would not violate the requirements of the rule.²⁴⁶

232. In the Draft Site Permit, the following sections address impacted agriculture: Section 4.2.9 (Topsoil Protection), Section 4.2.10 (Soil Compaction), Section 4.2.11 (Soil Erosion and Sediment Control), Section 4.2.16 (Invasive Species), Section 4.2.17 (Noxious Weeds).²⁴⁷

2. Forestry

233. No forested lands or commercial forestry operations exist within the Project Area. Therefore, no mitigation measures are necessary or proposed.²⁴⁸

3. Mining

234. There are no known mining operations documented in the Project Area.²⁴⁹

235. Construction of the Project will require the use of sand and aggregate for structural backfill and to construct reliable access routes for construction equipment. Based on availability, some of the sand and aggregate material could come from sources near the Generation Project. Increased demand for sand and aggregate material for the Project will be temporary and limited to the period of construction and is considered an indirect impact. Additional new mining operations or expansion of existing mines will not be necessary to satisfy Project demand.²⁵⁰

236. Because impacts to mining are not anticipated, no mitigation measures are proposed.²⁵¹

4. Tourism

237. Tourism near the RI is limited, with the annual Lyon County Fair located approximately 19 miles north of the Project Area in Marshall, and camping at the Garvin County Park located approximately 2.5 miles north along the Cottonwood River.²⁵²

238. Because impacts to tourism are not anticipated, no mitigation measures are proposed.²⁵³

²⁴⁶ Ex. EIP-14 at 88 (EA) (eDocket No. 20261-226695-01).

²⁴⁷ Ex. EIP-14, Appendix D at 5-7 (Draft Site Permit) (eDockets No. 20261-226695-01).

²⁴⁸ Ex. EIP-14 at 92 (EA) (eDocket No. 20261-226695-01).

²⁴⁹ Ex. EIP-14 at 92 (EA) (eDocket No. 20261-226695-01).

²⁵⁰ Ex. EIP-14 at 92 (EA) (eDocket No. 20261-226695-01).

²⁵¹ Ex. EIP-14 at 92 (EA) (eDocket No. 20261-226695-01).

²⁵² Ex. EIP-14 at 93 (EA) (eDocket No. 20261-226695-01).

²⁵³ Ex. EIP-14 at 93 (EA) (eDocket No. 20261-226695-01).

D. Archaeological and Historic Resources

239. Known archaeological and historic resources within one mile of the Project (the RI for cultural resources) were identified through a review of the OSA online portal and the Minnesota SHPO's online portal (Minnesota's Statewide Historic Inventory Portal (MnSHIP)) in September 2025. MnSHIP is a comprehensive database of all documented historic architectural resources for the entire state, while the OSA portal is a database of all previously recorded archaeological sites in the state. It is possible that the Project may encounter an undocumented resource.²⁵⁴

240. At the request of Xcel Energy, Burns & McDonnell Engineering Company, Inc. (Burns & McDonnell) conducted a Phase I Cultural Resource Survey in April 2024 to determine whether cultural resources are present within the Project Area. This survey resulted in the identification of one historic architectural resource within the northwestern portion of the survey area (The Garvin Corner Store/LY-CUS-00053), approximately 1/2 mile north of the Project Area. Burns & McDonnell recommended a determination of No Historic Sites Affected and submitted the survey report to SHPO and the OSA for concurrence on March 4, 2025. SHPO concurred with these recommendations on April 23, 2025, and the OSA concurred on May 06, 2025.²⁵⁵

241. Within the 1-mile of the RI, three archaeological sites have been recorded, all of which are unevaluated.²⁵⁶

242. Because no archaeological resources have been identified within the project area, no impacts to archaeological resources are anticipated. Further, no National Register of Historic Places-eligible or unevaluated resources are within the project area or within the RI of the project. Thus, no known historical resources will be impacted by the project.²⁵⁷

243. Xcel Energy will develop an unanticipated discovery plan (UDP) for use during construction of the Project that outlines the procedures to be followed in the event unanticipated archaeological materials are found. If archaeological resources are discovered during construction, construction activity will be halted in that location, the SHPO and interested Tribal Historic Preservation Officers (THPOs) will be notified, and appropriate measures will be implemented to protect the resource.²⁵⁸

244. In the Draft Site Permit, the following section addresses unanticipated archaeological resources: 4.2.19 (Archaeological and Historic Resources).²⁵⁹

²⁵⁴ Ex. EIP-14 at 95 (EA) (eDocket No. 20261-226695-01).

²⁵⁵ Ex. EIP-14 at 95-96 (EA) (eDocket No. 20261-226695-01).

²⁵⁶ Ex. EIP-14 at 98 (EA) (eDocket No. 20261-226695-01).

²⁵⁷ Ex. EIP-14 at 98 (EA) (eDocket No. 20261-226695-01).

²⁵⁸ See Ex. EIP-14 at 98 (EA) (eDocket No. 20261-226695-01); Ex. XCEL-25 at 5 (Beemer Direct) (eDocket No. 20261-226770-03).

²⁵⁹ Ex. EIP-14, Appendix D at 8 (Draft Site Permit) (eDocket No. 20261-226695-01).

E. Natural Environment

1. Air Quality

245. Air emissions during construction will primarily consist of emissions from construction equipment and will include pollutants such as CO₂, nitrogen oxides (NO_x), PM_{2.5}, and PM₁₀. Dust generated from earth disturbing activities also gives rise to particulate matter. Emissions from construction vehicles could be minimized by using modern equipment with lower emissions ratings. Adverse effects on the surrounding environment are expected to be negligible due to the temporary disturbance during construction and the intermittent nature of the emission- and dust-producing construction phases.²⁶⁰

246. If construction activities generate problematic dust levels, Xcel Energy may employ construction-related practices such as wetting of unpaved roads and exposed or barren ground to control fugitive dust. Additionally, cleared rights-of way, storage areas, and access roads will be restored and revegetated once construction is complete, limiting further dust production during operation.²⁶¹

247. Operation of the Generation Project includes two 210 MW CTs and associated ancillary equipment, including emergency diesel generators, an emergency diesel fire pump, diesel storage tanks, a natural gas-fired water bath heater, and natural gas piping components.²⁶²

248. For the Generation Project, the CTs will be equipped with low-NO_x burners to limit NO_x formation and Xcel Energy will also employ good combustion practices (i.e., operation of combustion equipment at best combustion efficiency) to reduce CO, volatile organic compounds (VOCs), and CO₂ emissions. Combusting natural gas, a low sulfur and low ash fuel, will also reduce particulate matter and sulfur dioxide (SO₂) emissions compared to alternative fossil fuel sources.²⁶³

249. Xcel Energy conducted air dispersion modeling to determine whether emissions from the Project will cause or contribute to a violation of the Minnesota Ambient Air Quality Standards (MAAQS) and National Ambient Air Quality Standards (NAAQS). Modeling was conducted in accordance with the EPA's Guidance on Air Quality Models (40 C.F.R. Part 51) and MPCA's Air Dispersion Modeling Practices. Xcel Energy submitted a modeling protocol to the MPCA that was conditionally approved on August 14, 2025. The modeling results were approved by the MPCA on December 17, 2025.²⁶⁴

250. Obtaining a Title V air permit from the MPCA is required to construct and operate the Generation Project. The Title V air permit will contain regulatory requirements,

²⁶⁰ Ex. EIP-14 at 83-84 (EA) (eDocket No. 20261-226695-01).

²⁶¹ Ex. EIP-14 at 86 (EA) (eDocket No. 20261-226695-01).

²⁶² Ex. EIP-14 at 84 (EA) (eDocket No. 20261-226695-01).

²⁶³ Ex. EIP-14 at 87 (EA) (eDocket No. 20261-226695-01).

²⁶⁴ Ex. EIP-14 at 85 (EA) (eDocket No. 20261-226695-01).

limits, and compliance demonstration requirements. Xcel Energy submitted a Title V air permit application to the MPCA on September 24, 2025.²⁶⁵

251. The Project does not meet the definition of a major emission facility with respect to the EPA Prevention of Significant Deterioration (PSD) and will not require PSD review. The Lyon County Generation Station will be a minor source of hazardous air pollutants (HAPs) as it will emit less than 10 tons of any single HAP and less than 25 tons of combined HAPs from all emission sources. Federally enforceable permit conditions will be established in the Title V air permit to ensure the facility remains non-PSD and a minor source of HAP emissions.²⁶⁶ EPA, Region 5 stated it did not have comments regarding the EA for the Project.²⁶⁷

2. Greenhouse Gas

252. During Project construction and operation, small amounts of GHGs will be generated. GHG emissions from Project construction will be largely from the combustion of fossil fuels such as gasoline and diesel for vehicles and construction equipment. Primary sources of GHG emissions during operation include the CTs, emergency diesel generators, emergency diesel fire pump, heaters, tanks, circuit breakers, and piping fugitives. Additionally, GHG emissions will be generated from temporary and permanent changes in land carbon sinks. GHG emissions will be localized to the Project Area and are not anticipated to result in long-term impacts.²⁶⁸

253. Where possible, construction equipment will use lower GHG-emitting fuels, such as low-sulfur diesel and gasoline. Additionally, equipment will not be idled unnecessarily during construction, thereby reducing emissions during construction.²⁶⁹

3. Climate Change

254. The Generation Project will result in GHG emissions that will contribute to climate change impacts such as changes in temperature, precipitation, and extreme weather events. Energy projects are generally considered critical facilities and require extra attention when considering climate change risks.²⁷⁰

255. The Draft Pipeline Routing Permit, Transmission Line Route Permit, and Site Permit do not contain mitigation measures specific to GHG emissions. However, a list of the key resiliency efforts for the Project includes:

- The transmission lines will be routed and engineered to be resilient under changing climatic factors, including increased average temperatures. The

²⁶⁵ Ex. EIP-14 at 84 (EA) (eDocket No. 20261-226695-01).

²⁶⁶ Ex. EIP-14 at 84, 86 (EA) (eDocket No. 20261-226695-01).

²⁶⁷ Environmental Protection Agency Region 5 Comments (eDocket No. 20262-228103-01).

²⁶⁸ Ex. EIP-14 at 76 (EA) (eDocket No. 20261-226695-01).

²⁶⁹ Ex. EIP-14 at 77 (EA) (eDocket No. 20261-226695-01).

²⁷⁰ Ex. EIP-14 at 83 (EA) (eDocket No. 20261-226695-01).

transmission lines will be designed to meet or surpass relevant local and state codes, including the NESC and Xcel Energy's standards.

- During construction, a Stormwater Pollution Prevention Plan (SWPPP) will be implemented to manage stormwater and reduce the potential for runoff and erosion. Where areas are subject to higher rates of erosion, vegetation establishment will be achieved within the timelines required in the SWPPP, thereby minimizing potential impacts for erosion. During the Project's operations, vegetative cover will minimize potential for erosion impacts to waterways. Storm events will also be considered during the SWPPP development to design permanent stormwater features.
- Wildfire risks will be mitigated by performing necessary vegetation management for the transmission line. Additionally, an emergency diesel fire pump will be at the site to protect against fire, should a fire arise.²⁷¹

4. Geology and Topography

256. The topography of the Project Area is generally flat with an elevation around 1,520 feet above mean sea level. The Project Area seismic risk is very low; it is located within an area rated as less than a two-percent chance of damage from natural or human-induced earthquakes in 10,000 years.²⁷²

257. The construction methods used for the Project will not alter the geology of the region; therefore, no impacts to geological resources are anticipated and no mitigation measures are proposed.²⁷³

5. Soils

258. The dominant soils within the Project Area are silty clay (60%), loam (25%), and silty clay loam (12%). Agriculture is the sole existing land use in the Project Area.²⁷⁴

259. In the Draft Site Permit, Sections 4.2.9 (Topsoil Protection), 4.2.10 (Soil Compaction), and 4.2.11 (Soil Erosion and Sediment Control) address impacts to soil.²⁷⁵

6. Water Quality and Resources

(1) Groundwater

260. The DNR recommends that the Project's water appropriation needs may require a General Permit for Temporary Appropriation to allow the Applicant to fill a water storage tank, which will be approximately 500,000 gallons, if groundwater pumped

²⁷¹ Ex. EIP-14 at 82-83 (EA) (eDocket No. 20261-226695-01).

²⁷² Ex. EIP-14 at 99 (EA) (eDocket No. 20261-226695-01).

²⁷³ Ex. EIP-14 at 99 (EA) (eDocket No. 20261-226695-01).

²⁷⁴ Ex. EIP-14 at 99 (EA) (eDocket No. 20261-226695-01).

²⁷⁵ Ex. EIP-14, Appendix D at 5 (Draft Site Permit) (eDocket No. 20261-226695-01).

exceeds 10,000 gallons in a day. Xcel Energy must ensure any necessary permit is obtained for groundwater use.²⁷⁶

261. Evaporative coolers were originally included in the application and have been removed from the plan, reducing the need for water.²⁷⁷ The Project is not expected to have a significant impact on groundwater resources within the Project Area and the EA did not propose mitigation.²⁷⁸

(2) *Surface Water*

262. The Project does not have public water basins, wetlands, or watercourses in the Project Area. The Project is also sited to avoid the field delineated wetland; therefore, no direct impacts to wetlands are anticipated. In addition, the Generation Project will not directly impact other surface waters.²⁷⁹

263. The Project will be required to obtain a National Pollutant Discharge Elimination System/State Disposal System (NPDES/SDS) permit for construction stormwater runoff. Xcel Energy will apply for authorization to discharge stormwater associated with construction activity under the PCA NPDES/SDS Construction Stormwater General permit (MNR100001).²⁸⁰

264. The SWPPP will identify Best Management Practices (BMP) to be implemented during construction to minimize erosion, and sedimentation impacts to surface waters.²⁸¹

7. Flora (Vegetation)

265. Project construction will result in short-term and long-term impacts on existing agricultural vegetation. Short-term impacts on existing vegetation will include localized clearing and ground disturbance associated with Project construction activities. Long-term impacts on vegetation will occur in areas where industrial-agricultural landcover will be permanently converted to developed landcover consisting of Project infrastructure.²⁸²

266. In the Draft Site Permit, Sections 4.2.14 (Native Prairie), 4.2.15 (Vegetation Removal), 4.2.16 (Invasive Species), and 4.2.17 (Noxious Weeds) address impacts to vegetation.²⁸³

²⁷⁶ DNR Comment Letter on EA and Sample Permits (eDocket No. 20262-228065-01).

²⁷⁷ Ex. EIP-12 (Xcel Energy's Design Updates for Consideration for the Lyon County Generating Station Project Letter) (eDocket No. 202510-223500-01).

²⁷⁸ Ex. EIP-14 at 103 (EA) (eDocket No. 20261-226695-01).

²⁷⁹ Ex. EIP-14 at 103-104 (EA) (eDocket No. 20261-226695-01).

²⁸⁰ Ex. EIP-14 at 104 (EA) (eDocket No. 20261-226695-01).

²⁸¹ Ex. EIP-14 at 104 (EA) (eDocket No. 20261-226695-01).

²⁸² Ex. EIP-14 at 106 (EA) (eDocket No. 20261-226695-01).

²⁸³ Ex. EIP-14, Appendix D at 6-7 (Draft Site Permit) (eDocket No. 20261-226695-01).

267. Xcel Energy proposed the following mitigation measures to minimize potential impacts to vegetation, to be included in the Vegetation Management Plan:

- Once construction is completed in an area, disturbed areas that will not be used for permanent Project facilities and those areas not to remain in agricultural production will be restored via broadcast seeding using a native seed mix comprised of species such as big bluestem (*Andropogon gerardi*), Indian grass (*Sorghastrum nutans*), and switchgrass (*Panicum virgatum*).
- Possibly planting native shrubs along the western and northern boundaries of the Project Area to serve as windbreaks and snowbreaks.
- Preventing the introduction of noxious weeds and invasive species by cleaning equipment and removing visible dirt or plant parts using methods such as vehicle washing, high-pressure compressed air blowers, or brushing, as applicable.
- Monitoring areas where seeding and erosion control measures have been implemented and following up with reseeding measures where vegetative cover by the restoration seeding or plantings is inadequate to provide long-term stability and sustainable native plant communities.²⁸⁴

8. Fauna (Wildlife and their Habitats)

268. Wildlife habitat diversity within and adjacent to the Project Area is low, consisting almost entirely of disturbed habitats associated with industrial-agriculture and rural development. Typical wildlife species inhabiting the area include mammals, such as deer, fox, squirrels, and raccoons; songbirds, such as robins and red-winged blackbirds; and reptiles, such as garter snakes.²⁸⁵

269. The Project Area and surrounding areas are located in a Wildlife Action Network corridor that is ranked low. The Wildlife Action Network is a metric that can be used to assess buffers and connectors of habitats representing the diversity of habitat quality, supporting Species in Greatest Conservation Need.²⁸⁶

270. Construction activities that generate noise, dust, or disturbance of habitat can result in short-term, indirect impacts on wildlife. Given the industrial-agriculture nature of the Project Area, most wildlife inhabiting the area are accustomed to human activity and disturbance to some capacity. However, during Project construction, wildlife in the Project Area will likely abandon habitats for similar habitat in the area. Clearing and grading activities may directly impact some less-mobile species, such as birds, if eggs or nestlings are located in the Project Area. However, annual industrial-agriculture activities pose a similar or greater risk to birds. Due to lack of suitable habitat in the Project Area,

²⁸⁴ Ex. EIP-14 at 108 (EA) (eDocket No. 20261-226695-01).

²⁸⁵ Ex. EIP-14 at 109 (EA) (eDocket No. 20261-226695-01).

²⁸⁶ Ex. EIP-14 at 109 (EA) (eDocket No. 20261-226695-01).

impacts to bald eagles or the migratory Birds of Conservation Concern identified in the Information for Planning and Consultation (IPaC) query are not anticipated.²⁸⁷

271. In the Draft Site Permit, the following sections 4.2.27 (Facility Lighting), 4.2.28 (Dust Control), and 4.2.29 (Wildlife Friendly Erosion Control) address impacts to Fauna.²⁸⁸

272. Xcel Energy proposed the following appropriate mitigation measures in its Combined Application to minimize potential impacts to wildlife or wildlife habitat:

- Implementation of several construction BMPs that are beneficial to wildlife including: wildlife training for construction personnel, posted speed limits, spill prevention measures, and general construction housekeeping such as trash removal and maintaining a clean work area.
- Designing transmission line facilities to comply according to Avian Power Line Interaction Committee recommended guidance to reduce the potential for avian electrocutions.²⁸⁹

F. Rare and Unique Natural Resources

1. Protected Species

273. The United States Fish & Wildlife Service (USFWS) IPaC online tool was queried on September 26, 2025, for a list of federally threatened and endangered species, proposed species, candidate species, and designated critical habitat that may be present within or near the Project Area. The IPaC query identified the proposed threatened monarch butterfly (*Danaus Plexippus*) and the proposed endangered Suckley's cuckoo bumble bee (*Bombus suckleyi*) as potentially being present in the Project Area. The IPaC query did not identify any designated critical habitat within or near the Project Area.²⁹⁰

274. The DNR's Natural Heritage Inventory System (NHIS) database was reviewed in September 2025 to determine if any Minnesota state-listed species have been documented within the vicinity of the Project Area. No state endangered, threatened, or special concern species have been documented within one mile of the Project Area.²⁹¹

²⁸⁷ Ex. EIP-14 at 110 (EA) (eDocket No. 20261-226695-01).

²⁸⁸ Ex. EIP-14, Appendix D at 10 (Draft Site Permit) (eDocket No. 20261-226695-01).

²⁸⁹ Ex. EIP-14 at 112 (EA) (eDocket No. 20261-226695-01).

²⁹⁰ Ex. EIP-14 at 113 (EA) (eDocket No. 20261-226695-01).

²⁹¹ Ex. EIP-9 (DNR Natural Heritage Review) (eDocket No. 20258-222476-02).

2. Sensitive Ecological Resources

275. The project area is located within a Prairie Conservation Plan (Plan) corridor. The Plan is a 25-year strategy for accelerating prairie conservation in the state, focusing efforts on grasslands and wetlands.²⁹²

276. Impacts to the Prairie Conservation Plan corridor that is mapped throughout the area are not anticipated given the relatively small size of the Project Area and the fact that the Project Area is essentially devoid of native vegetation.²⁹³

277. Impacts to federal or state-protected species are not anticipated from the Project.²⁹⁴

278. In the Draft Site Permit, Section 4.2.14 (Native Prairie) addresses impacts to rare and unique natural resources.²⁹⁵

III. SITE PERMIT CONDITIONS

279. The Draft Site Permit, as revised by PUC-EIP and Xcel Energy, includes several proposed permit conditions, many of which have been discussed above.

280. On January 12, 2026, Xcel Energy requested that the Commission include a provision to allow the Project to proceed expeditiously with construction to meet the December 2028 in-service date.²⁹⁶ The proposal states:

Permittee may conduct vegetation clearing, topsoil removal, and grading of the site shown on Figure 1-2 of the Application immediately upon issuance of the Site Permit, provided that the Permittee submits a filing to the Commission confirming that: (1) Permittee provided notice to adjacent landowners of Project construction at least five days in advance, including contact information for Permittee's field representative; and (2) Permittee has received all required permits and approvals for the activity to be conducted.²⁹⁷

281. PUC-EIP staff support this special condition but note the special condition would require a compliance filing, which would be reviewed by EIP staff. If EIP review identified issues or concerns, they would be addressed in a timely manner.²⁹⁸

282. The Judge finds Xcel Energy's proposed special condition for the Site Permit is reasonable.

²⁹² Ex. EIP-14 at 113 (EA) (eDocket No. 20261-226695-01).

²⁹³ Ex. EIP-14 at 114 (EA) (eDocket No. 20261-226695-01).

²⁹⁴ Ex. EIP-14 at 115 (EA) (eDocket No. 20261-226695-01).

²⁹⁵ Ex. EIP-14, Appendix D at 6 (Draft Site Permit) (eDocket No. 20261-226695-01).

²⁹⁶ Ex. XCEL-24 at 6 (Aasen Direct) (eDocket No. 20261-226770-02).

²⁹⁷ Ex. XCEL-24 at 6 (Aasen Direct) (eDocket No. 20261-226770-02).

²⁹⁸ PUC-EIP Comments on Proposed Findings of Fact at 4 (eDocket No. 20262-228719-01).

283. On February 11, 2026, the DNR proposed a modification to special condition 5.3.10 requiring a VMP. In addition, the DNR recommended a special condition for the Route Permit for the pipeline and the Site Permit similar to permit condition 5.3.10. The special condition would direct Xcel Energy to develop a VMP for all areas that do not contain permanent facilities within the project footprint.²⁹⁹

284. On February 11, 2026, the VMPWG recommended adapting permit condition 5.3.10 to a special permit condition requiring the applicant to develop a vegetation management plan for all areas not used for permanent facilities within the entire project footprint and included proposed special condition permit language. VMPWG's proposed language is:³⁰⁰

5.3.10 Vegetation Management Plan

The Permittee shall develop a vegetation management plan (VMP), in coordination with the VMPWG, using best management practices established by the DNR and BWSR. The VMP shall address all areas not used for permanent facilities within the Lyon County Generating Station footprint. The Permittee shall file the VMP and documentation of the coordination efforts between the Permittee and the coordinating agencies with the Commission at least 14 days prior to the pre-construction meeting. The VMP must include the following information for the generation facilities (site) and the transmission lines and pipelines (routes):

- (a) management objectives addressing short term (year 0-5, seeding and establishment) and long term (year 5 through the life of the Project) goals for the site and routes;
- (b) a description of planned restoration and vegetation management activities, including how the site and routes will be prepared, timing of activities, how seeding will occur (e.g., broadcast, drilling, etc.), and the types of seed mixes and vegetation to be used, including: a. temporary seed mixes and cover crops, b. permanent seed mixes, c. and native shrub species that will serve as windbreaks and snowbreaks along the boundaries of the project;
- (c) a description of how the site and routes will be monitored and evaluated to meet management goals;
- (d) a description of the management tools used to maintain vegetation (e.g., mowing, spot spraying, hand removal, etc.) within the site and routes, including the timing and frequency of maintenance activities;

²⁹⁹ DNR Comment Letter on EA and Sample Permits. (eDocket No. 20262-228065-01).

³⁰⁰ VMPWG Comments (eDocket No. 20262-228073-01).

(e) identification of the third-party (e.g., consultant, contractor, site manager, etc.) contracted for restoration, monitoring, and long-term vegetation management of the site and routes;

(f) identification of noxious weeds and invasive species (native and non-native) within the site and routes and the monitoring and management practices to be utilized; and

(g) a marked-up copy of the project Site Plan and rights-of-way Plan and Profile showing how the site and routes will be revegetated and identifying the corresponding seed mixes and native shrub species. Best management practices should be followed concerning seed mixes, seeding rates, cover crops, and shrub selection.

285. Xcel Energy stated the entirety of the Project area is currently in agricultural production and will be owned by Xcel Energy. The Project Area is approximately 155 acres in size, with permanent impacts on approximately 30 acres. The northern half of the Project area will also include the Garvin Substation associated with Minnesota Energy Connection. Xcel is committed to restoring and revegetating the Project site (outside of the footprint of permanent facilities). Xcel Energy proposed that, in lieu of the vegetation management plan required under Section 5.3.10, it would provide a landscape/restoration diagram showing how the facility site will be revegetated after construction is completed.³⁰¹

286. On February 26, 2026, PUC-EIP stated it supported DNR's recommendation to include special permit conditions in the Route Permit and the Pipeline Permit.³⁰²

287. Regarding Xcel Energy's proposal for a landscape/restoration diagram showing how the facility site will be revegetated after construction is completed, PUC-EIP stated it did not believe that the information contained in a VMP could be appropriately contained in the proposed diagram.³⁰³

288. PUC-EIP recommended the Commission adopt the language proposed by the VMPWG.³⁰⁴

289. The Judge finds PUC-EIP's proposed special condition for the Site Permit is reasonable.

IV. ROUTE PERMIT CRITERIA

290. The Power Plant Siting Act (PPSA), Minn. Stat. Ch. 216E, requires that route permit determinations "be guided by the state's goal to conserve resources,

³⁰¹ Xcel Energy Response to Hearing Comments at 2 (eDocket No. 20262-228410-01).

³⁰² PUC EIP Comments on Proposed Findings of Fact at 2-3 (eDocket No. 20262-228719-01).

³⁰³ PUC EIP Comments on Proposed Findings of Fact at 4 (eDocket No. 20262-228719-01).

³⁰⁴ PUC EIP Comments on Proposed Findings of Fact at 3 (eDocket No. 20262-228719-01).

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."³⁰⁵

291. When deciding whether to issue a Route Permit, the Commission considers the factors set forth in Minn. Stat. § 216E.03, subd. 7, which are the same factors reviewed above for the Site Permit for the Project. The Judge will analyze the factors that require specific Route Permit analysis.

V. APPLICATION OF ROUTE PERMIT CRITERIA TO THE TRANSMISSION LINE PROJECT

292. As referenced earlier in these Findings, the Commission issued an order stating that PUC-EIP Staff should solely include the site and route for the Project identified by Xcel Energy in its Combined Application in the EA scoping decision.³⁰⁶ This section of Findings analyzes only the Route Permit for two, less than one-mile, single-circuit 345-kilovolt (kV) transmission lines under the alternative permitting procedures of Minn. R. 7850.2800 to .3900.³⁰⁷

A. Effects on Human Settlement

1. Displacement

293. There are no residential or non-residential structures within the Project Area. Therefore, no displacement of residential or non-residential structures will occur from the transmission line Project.³⁰⁸

2. Noise

294. Potential impacts from transmission line Project sound levels were modeled using predictive noise modeling. Modeling indicates the transmission line Project's operational noise will remain within both daytime and nighttime operating limits for all modeled scenarios and significant noise impacts from the transmission line Project are not anticipated.³⁰⁹

3. Aesthetics

295. The transmission line Project is in an industrial-agricultural setting with existing utility infrastructure.³¹⁰

³⁰⁵ Minn. Stat. § 216E.03, subd. 7.

³⁰⁶ Ex. PUC-9 (Order on Including only Site and Route Identified in Application) (eDocket No. 202510-224353-01).

³⁰⁷ Ex. XCEL-3 (Notice of Intent to Submit under Alternative Process) (eDocket No. 20254-217527-01).

³⁰⁸ Ex. EIP-14 at 6 (EA) (eDocket No. 20261-226695-01).

³⁰⁹ Ex. EIP-14 at 6 (EA) (eDocket No. 20261-226695-01).

³¹⁰ Ex. EIP-14 at 5 (EA) (eDocket No. 20261-226695-01).

296. Aesthetic impacts may occur due to proximity to residences. There are two residences within 2,000 feet of the transmission line Project. The transmission line Project will result in the introduction of new infrastructure in a relatively rural area. However, aesthetic impacts may be minimized by co-locating the transmission line Project adjacent to the MNEC Project.³¹¹

297. The Draft Route Permit for the transmission line Project contains the following conditions related to aesthetic impacts: Section 5.3.7 (Aesthetics) and Section 5.3.22 (Facility Lighting).³¹²

4. Cultural Values

298. Cultural value impacts are anticipated to be minimal. The transmission line Project will not adversely impact the work of residents that underlie the area's cultural values, nor is it anticipated to adversely impact geographical features that inform these values. Xcel Energy is committed to continuing to coordinate with Tribal Nations that may have an interest in the transmission line Project, including the Upper Sioux Community and Lower Sioux Indian Community.³¹³

5. Public Services and Infrastructure

299. The transmission line Project will connect to the MNEC Garvin substation. There will be no direct permanent impact on US 59.³¹⁴

300. The Project components, including the transmission line Project, will not disturb electric utilities and thus no disruptions to electrical service are anticipated.³¹⁵

301. The transmission line Project is not anticipated to impact emergency services. Temporary road closings may occur during construction activities. The temporary road closings are not expected to have significant impacts on public services and access in the area because of the rural nature of the area and low traffic levels on most roads.³¹⁶

302. There are no public or private airports within one mile of the transmission line Project. Thus, no impacts to airports are anticipated. The nearest airport is Tracy Municipal which is approximately 9 miles away from the Project Area. Xcel Energy will coordinate with the FAA for appropriate notifications associated with transmission line Project construction as necessary.³¹⁷

³¹¹ Ex. EIP-14 at 5 (EA) (eDocket No. 20261-226695-01).

³¹² Corrections to EA (Mar. 24, 2026), Appendix E at 6, 11 (eDocket No. 20263-229600-01).

³¹³ Ex. EIP-14 at 6 (EA) (eDocket No. 20261-226695-01).

³¹⁴ Ex. EIP-14 at 67 (EA) (eDocket No. 20261-226695-01).

³¹⁵ Ex. EIP-14 at 7 (EA) (eDocket No. 20261-226695-01).

³¹⁶ Ex. EIP-14 at 7 (EA) (eDocket No. 20261-226695-01).

³¹⁷ Ex. EIP-14 at 7 (EA) (eDocket No. 20261-226695-01).

6. Socioeconomics and Property Values

303. No adverse impacts to socioeconomics are anticipated as a result of the transmission line Project. The transmission line Project is anticipated to generate minor, short-term positive influx driven by increased construction activity and a small influx of contractor employees.³¹⁸

7. Land Use and Zoning

304. Impacts from the transmission lines are anticipated to be negligible. Permanent impacts are limited to the Project Area, which will be owned by Xcel Energy.³¹⁹

8. Environmental Justice

305. As noted above, the Project Area is not within an identified EJ area, and there are no EJ areas within one mile of the transmission line Project.³²⁰

B. Public Health and Safety

1. Electromagnetic Fields (EMF)

306. EMF are invisible areas of energy associated with the use of electrical power. For lower EMF frequencies associated with power lines, electric and magnetic fields are relatively decoupled. Generally, electric fields are dependent on the voltage of a transmission line and magnetic fields are dependent on the current carried by a transmission line. Both magnetic and electric fields decrease rapidly with an increased distance from the source.³²¹

307. There is currently no federal standard for transmission line electric fields. The Commission has established a standard for the maximum electric field under transmission lines as 8 kV/m measured at one meter (3.28 feet) above the ground. All transmission lines in Minnesota must meet this standard.³²²

308. The maximum electric field measured at one meter above ground associated with the transmission line Project is estimated to be 4.14 kV/m, well below the 8 kV/m standard.³²³

309. Impacts due to EMF from the transmission lines are anticipated to be minimal, and no additional mitigation is proposed.³²⁴

³¹⁸ Ex. EIP-14 at 6 (EA) (eDocket No. 20261-226695-01).

³¹⁹ Ex. EIP-14 at 6 (EA) (eDocket No. 20261-226695-01).

³²⁰ Ex. EIP-14 at 6-7 (EA) (eDocket No. 20261-226695-01).

³²¹ Ex. EIP-14 at 8 (EA) (eDocket No. 20261-226695-01).

³²² Ex. EIP-14 at 70 (EA) (eDocket No. 20261-226695-01).

³²³ Ex. EIP-14 at 71 (EA) (eDocket No. 20261-226695-01).

³²⁴ Ex. EIP-14 at 71-3 (EA) (eDocket No. 20261-226695-01).

2. Implantable Medical Devices

310. Implantable medical devices, such as cardiac pacemakers, implantable cardioverter defibrillators (ICDs), neurostimulators, and insulin pumps, may be subject to electromagnetic interference. The American Conference of Governmental Industrial Hygienists and ICD Manufacturers' recommended magnetic and electric field exposure limits are 1 g and 1 kV/m, respectively, for people with pacemakers.³²⁵

311. EMF exposure produced by transmission lines generally does not affect implantable devices. Accordingly, impacts to implantable medical devices and their users are anticipated to be negligible at the edge of the project area.³²⁶

3. Stray & Induced Voltage

312. Stray voltage is not created by transmission lines, as they do not directly connect to businesses or residences. Stray voltage is generally associated with electrical distribution lines and electrical service at a residence or on a farm. Site-specific mitigation measures may be required to address potential stray voltage impacts.³²⁷

313. The transmission lines will be located on property Xcel Energy will own and no impacts due to stray and induced voltage are anticipated. No mitigation measures are proposed.³²⁸

C. Land-Based Economies

1. Agriculture

314. Industrial-agriculture is the sole existing land use in the Project Area.³²⁹ The transmission lines are not anticipated to impact agricultural production.

315. The Draft Route Permit for the Transmission Line Project contains the following appropriate conditions related to impacts to agriculture: Section 5.3.11 (Application of Pesticides), Section 5.3.17 (Drainage Tiles), and 5.3.18 (Restoration).³³⁰

2. Forestry

316. No forested lands or commercial forestry operations exist within the Project Area; therefore, no impacts to forests are anticipated.³³¹

³²⁵ Ex. EIP-14 at 73 (EA) (eDocket No. 20261-226695-01).

³²⁶ Ex. EIP-14 at 74 (EA) (eDocket No. 20261-226695-01).

³²⁷ Ex. EIP-14 at 74 (EA) (eDocket No. 20261-226695-01).

³²⁸ Ex. EIP-14 at 74-75 (EA) (eDocket No. 20261-226695-01).

³²⁹ Ex. XCEL-4 at 49 (Application) (eDocket No. 20255-218749-02).

³³⁰ Corrections to EA, Appendix E at 7, 10 (eDocket No. 20263-229600-01).

³³¹ Ex. EIP-14 at 11 (EA) (eDocket No. 20261-226695-01).

3. Tourism

317. There are no known tourism-based businesses or attractions documented in the immediate vicinity of the Project Area; therefore, no impacts to recreation or tourism are anticipated as a result of the transmission line Project.³³²

4. Mining

318. Based on the MnDOT's Gravel Pit and Rock Quarry Aggregate Source, no active or inactive mining operations are present in proximity to the Project Area.³³³

319. No direct impacts to mining are anticipated as a result of the transmission line Project and no mitigation measures are proposed.³³⁴

D. Archaeological and Historic Resources

320. No archaeological resources have been identified within the Project Area, and no impacts are anticipated.³³⁵

E. Natural Environment

1. Air Quality and Climate Change

321. During operation of the transmission lines, air emissions will be minimal.³³⁶ Small amounts of NO_x will be produced from the operation of the transmission lines through ionization of air molecules during corona discharge. These emissions are expected to be minimal. A small amount of ozone (O₃) will be created due to corona from the operation of the transmission lines. The emission of O₃ during operations is not anticipated to have a significant impact on the environment. Emissions from maintenance activities associated with mobile source combustion are likely to be temporary and minimal.³³⁷

322. There are no mitigation measures specific to impacts to air quality in the draft transmission line route permit.³³⁸

2. Water Quality and Resources

323. The transmission line Project does not have any source for process wastewater.³³⁹

³³² Ex. EIP-14 at 11 (EA) (eDocket No. 20261-226695-01).

³³³ Ex. XCEL-4 at 68 (Application) (eDocket No. 20255-218749-02).

³³⁴ Ex. EIP-14 at 11, 92 (EA) (eDocket No. 20261-226695-01).

³³⁵ Ex. EIP-14 at 11 (EA) (eDocket No. 20261-226695-01).

³³⁶ Ex. EIP-14 at 10 (EA) (eDocket No. 20261-226695-01).

³³⁷ Ex. EIP-14 at 84 (EA) (eDocket No. 20261-226695-01).

³³⁸ Ex. EIP-14 at 86 (EA) (eDocket No. 20261-226695-01).

³³⁹ Ex. EIP-14 at 12 (EA) (eDocket No. 20261-226695-01).

324. Lyon County submitted comments concerning the Project and the potential impacts of changes to water runoff to County Ditch 29 and County Ditch 24 located on the property where construction will occur.³⁴⁰ PCA also submitted a comment reminding the Commission that an approved Total Maximum Daily Load 1/9/2023 for E.coli and Total Suspended Solids for the Cottonwood River north of the Project was in place. In addition, directly to the West of the Project location, a tributary stream—County Ditch 29 flows directly to the Cottonwood River.³⁴¹

325. PUC-EIP noted that the Cottonwood River is an impaired water. PUC-EIP recommends that the permits provide sufficient conditions and best management practices, along with applicable construction stormwater permit provisions, to protect water resources near the Project Area.³⁴²

326. The Draft Route Permit for the transmission line Project contains the following appropriate conditions that address water resources: Section 5.3.8 (Soil Erosion and Sediment Control) and Section 5.3.17 (Drainage Tiles).³⁴³

3. Vegetation

327. Construction of the transmission line Project will result in short-term and long-term impacts on existing agricultural vegetation. Short-term impacts on existing vegetation would include localized clearing and ground disturbance associated with Project and construction activities. Long-term impacts include ground clearing up to 150 square feet for transmission line structure foundations.³⁴⁴

328. The Draft Route Permit for the transmission line Project contains an adequate condition addressing vegetation management, Section 5.3.10.³⁴⁵

4. Wildlife and Habitat

329. The transmission lines could have potential impacts on avian species as a result of electrocution or collision with the infrastructure.³⁴⁶ Xcel Energy designed the transmission line to comply with APLIC recommended guidance to reduce the potential for avian electrocutions.³⁴⁷

330. The Draft Route Permit for the transmission line Project contains the following adequate conditions that address wildlife: Section 5.3.16 (Avian Protection),

³⁴⁰ Ex. EIP-7 (Lyon County Planning & Zoning – Soil & Water Conservation District Comment Letter) (eDocket No. 20258-222217-01).

³⁴¹ MPCA Email regarding EA (eDocket No. 20262-228104-01).

³⁴² PUC EIP Comments on Proposed Findings of Fact at 3 (eDocket No. 20262-228719-01).

³⁴³ Corrections to EA, Appendix E at 6, 10 (eDocket No. 20263-229600-01).

³⁴⁴ Ex. EIP-14 at 12 (EA) (eDocket No. 20261-226695-01).

³⁴⁵ Corrections to EA, Appendix E at 7 (eDocket No. 20263-229600-01).

³⁴⁶ Ex. EIP-14 at 13 and 110 (EA) (eDocket No. 20261-226695-01).

³⁴⁷ See Ex. XCEL-4 at 88-89 (Application) (eDocket No. 20255-218749-02).

Section 5.3.22 (Facility Lighting), Section 5.3.23 (Dust Control), and Section 5.3.24 (Wildlife Friendly Erosion Control).³⁴⁸

5. Soils

331. The transmission line Project's impacts on soils are anticipated to be minimal and temporary. Soil impacts are dependent, to some extent, on the surface conditions at the time of construction. Construction activities that occur on wet soils tend to have longer lasting impacts regardless of the soil type. During dry conditions, soil disturbances will be temporary, minimal, and generally less invasive than typical industrial-agricultural practices such as plowing and tilling.³⁴⁹

332. The Draft Route Permit for the Transmission Line Project contains the following appropriate conditions that address wildlife: Section 5.3.8 (Soil Erosion and Sediment Control) and Section 5.3.17 (Drainage Tiles).³⁵⁰

F. Rare and Unique Natural Resources

333. Based on data reviewed from the DNR NHIS database, no state endangered, threatened, or special concern species have been documented within one mile of the Project Area. Given the agricultural landscape and lack of state-listed species documented within one mile of the transmission line Project, impacts to state-listed species are not anticipated. There are no mitigation measures required.³⁵¹

G. Application of Various Design Considerations

334. The Project has been designed to maximize energy efficiencies and mitigate adverse environmental effects.³⁵²

H. Use of Existing Large Electric Power Generating Plant Sites

335. The Project will not utilize any existing LEPGP sites. However, it will be adjacent and connected to the MNEC Garvin substation.³⁵³

I. Use or Parallelling of Existing Rights-of-Way

336. The Project is sited entirely within an existing agricultural field on property owned by Xcel Energy and adjacent to the MNEC Project.³⁵⁴

³⁴⁸ Corrections to EA, Appendix E at 9, 11 (eDocket No. 20263-229600-01).

³⁴⁹ Ex. EIP-14 at 12 (EA) (eDocket No. 20261-226695-01).

³⁵⁰ Corrections to EA, Appendix E at 6, 10 (eDocket No. 20263-229600-01).

³⁵¹ Ex. EIP-14 at 13 (EA) (eDocket No. 20261-226695-01).

³⁵² Ex. EIP-14 at 127 (EA) (eDocket No. 20261-226695-01).

³⁵³ Ex. EIP-14 at 128 (EA) (eDocket No. 20261-226695-01).

³⁵⁴ Ex. EIP-14 at 128 (EA) (eDocket No. 20261-226695-01).

J. Use of Existing Transportation, Pipeline, and Electrical Transmission System Rights-of-Way

337. Sharing right-of-way with existing infrastructure minimizes fragmentation of the landscape and can minimize human and environmental impacts (e.g., aesthetic and agricultural impacts). The Project is located adjacent and connected to the MNEC Garvin substation, which limits the extent of new right-of-way required to the greatest extent practical.³⁵⁵

K. Costs of Constructing, Operating, and Maintenance

338. The Project has been designed to minimize construction and operating costs to the extent practicable.³⁵⁶

L. Adverse Human and Natural Environment

339. The EA identifies unavoidable adverse effects associated with construction of the Project would last only for the duration of construction,³⁵⁷ as well as impacts associated with Project operation.³⁵⁸

340. Unavoidable adverse human and environmental effects due to the Project have been minimized to the extent possible.³⁵⁹

M. Irreversible and Irretrievable Commitments of Resources

341. An irretrievable commitment of resources means the resource is not recoverable for later use by future generations. These impacts are primarily related to Project construction, including the use of water, aggregate, hydrocarbons, steel, concrete, wood, and other consumable resources. The commitment of labor and fiscal resources is also considered irretrievable.³⁶⁰

342. Irreversible and irretrievable commitments of resources due to the Project have been minimized to the extent possible.³⁶¹

VI. CONSIDERATION OF ISSUES PRESENTED BY STATE AGENCIES AND LOCAL UNITES OF GOVERNMENT

343. Minnesota Statute § 216E.03, subd. 7(b)(12) requires the Commission to examine, when appropriate, issues presented by federal and state agencies and local entities. The issues presented by federal, state, and local units of government are

³⁵⁵ Ex. EIP-14 at 125 (EA) (eDocket No. 20261-226695-01).

³⁵⁶ Ex. EIP-14 at 128 (EA) (eDocket No. 20261-226695-01).

³⁵⁷ Ex. EIP-14 at 131 (EA) (eDocket No. 20261-226695-01).

³⁵⁸ Ex. EIP-14 at 131 (EA) (eDocket No. 20261-226695-01).

³⁵⁹ Ex. EIP-14 at 128 (EA) (eDocket No. 20261-226695-01).

³⁶⁰ Ex. EIP-14 at 131 (EA) (eDocket No. 20261-226695-01).

³⁶¹ Ex. EIP-14 at 128 (EA) (eDocket No. 20261-226695-01).

addressed in the findings above as part of the analysis of the Commission's siting and routing factors.

VII. ROUTE PERMIT CONDITIONS

344. The Draft Route Permit, as revised by PUC-EIP and Xcel Energy, includes several proposed permit conditions, many of which have been discussed above.

345. On February 11, 2026, the DNR proposed a modification to special condition 5.3.10 requiring a VMP. In addition, the DNR recommended a special condition for the Route Permit for the pipeline and the Site Permit similar to permit condition 5.3.10. The special condition would direct Xcel Energy to develop a VMP for all areas that do not contain permanent facilities within the project footprint.³⁶²

346. On February 11, 2026, the VMPWG recommended adapting permit condition 5.3.10 to a special permit condition requiring the applicant to develop a vegetation management plan for all areas not used for permanent facilities within the entire project footprint and included proposed special condition permit language. VMPWG's proposed language is:³⁶³

5.3.10 Vegetation Management Plan

The Permittee shall develop a vegetation management plan (VMP), in coordination with the VMPWG, using best management practices established by the DNR and BWSR. The VMP shall address all areas not used for permanent facilities within the Lyon County Generating Station footprint. The Permittee shall file the VMP and documentation of the coordination efforts between the Permittee and the coordinating agencies with the Commission at least 14 days prior to the pre-construction meeting. The VMP must include the following information for the generation facilities (site) and the transmission lines and pipelines (routes):

(a) management objectives addressing short term (year 0-5, seeding and establishment) and long term (year 5 through the life of the Project) goals for the site and routes;

(b) a description of planned restoration and vegetation management activities, including how the site and routes will be prepared, timing of activities, how seeding will occur (e.g., broadcast, drilling, etc.), and the types of seed mixes and vegetation to be used, including: a. temporary seed mixes and cover crops, b. permanent seed mixes, c. and native shrub species that will serve as windbreaks and snowbreaks along the boundaries of the project;

³⁶² DNR Comment Letter on EA and Sample Permits (eDocket No. 20262-228065-01).

³⁶³ VMPWG Comments (eDocket No. 20262-228073-01).

(c) a description of how the site and routes will be monitored and evaluated to meet management goals;

(d) a description of the management tools used to maintain vegetation (e.g., mowing, spot spraying, hand removal, etc.) within the site and routes, including the timing and frequency of maintenance activities;

(e) identification of the third-party (e.g., consultant, contractor, site manager, etc.) contracted for restoration, monitoring, and long-term vegetation management of the site and routes;

(f) identification of noxious weeds and invasive species (native and non-native) within the site and routes and the monitoring and management practices to be utilized; and

(g) a marked-up copy of the project Site Plan and rights-of-way Plan and Profile showing how the site and routes will be revegetated and identifying the corresponding seed mixes and native shrub species. Best management practices should be followed concerning seed mixes, seeding rates, cover crops, and shrub selection.

347. The entirety of the Project area is currently in agricultural production and will be owned by Xcel Energy. The Project Area is approximately 155 acres in size, with permanent impacts on approximately 30 acres. The northern half of the Project area will also include the Garvin substation associated with MNEC. Xcel committed to restoring and revegetating the Project site (outside of the footprint of permanent facilities). Xcel also proposed that, in lieu of the vegetation management plan required under Section 5.3.10, it instead provide a landscape/restoration diagram showing how the facility site will be revegetated after construction is completed.³⁶⁴ This latter proposal, as noted above, is not recommended.

348. PUC-EIP supports DNR's recommendation to include special permit conditions in the Route Permit and the Pipeline Permit.³⁶⁵

349. Regarding Xcel Energy's proposal for a landscape/restoration diagram showing how the facility site will be revegetated after construction is completed, PUC-EIP does not believe that the information contained in a VMP could be appropriately contained in the proposed diagram.³⁶⁶

350. PUC-EIP recommended the Commission adopt the language proposed by the VMPWG.³⁶⁷

³⁶⁴ Xcel Energy Response to Hearing Comments at 2 (eDocket No. 20262-228410-01).

³⁶⁵ PUC-EIP Comments on Proposed Findings of Fact at 2-3 (eDocket No. 20262-228719-01).

³⁶⁶ PUC-EIP Comments on Proposed Findings of Fact at 4 (eDocket No. 20262-228719-01).

³⁶⁷ PUC-EIP Comments on Proposed Findings of Fact at 3 (eDocket No. 20262-228719-01).

351. The Judge finds PUC-EIP's proposed special condition for the Route Permit is reasonable.

VIII. PIPELINE PARTIAL EXEMPTION PERMIT CRITERIA

352. Due to its limited size and impacts, Xcel Energy is seeking approval for the Pipeline under the Commission's partial exemption of pipeline route selection procedures.³⁶⁸

353. "In granting a partial exemption from the pipeline route selection procedures, the Commission must determine that the proposed pipeline and associated facilities will not have a significant impact on humans or the environment. The commission shall evaluate the impacts that may be reasonably expected to occur from the proposed pipeline and associated facilities."³⁶⁹

354. To determine whether a proposed pipeline and associated facilities qualify for partial exemption and issuance of a pipeline routing permit, the Commission looks at the impact on the ten factors set forth in Minn. R. 7852.0700, subp. 2 (2025).

A. Effects on Human Settlement, Existence and Density of Populated Areas, Existing and Planning Future Land Use, and Management Plans

355. The pipeline Project is located in a rural setting and is not designated for future residential or commercial development. There are two residences located within 2,000 feet of the Project Area.³⁷⁰

356. Impacts from the pipeline Project are anticipated to be negligible. Permanent impacts are limited to the Project Area, which will be owned by Xcel Energy. The pipeline Project would be consistent with authorized uses within the agricultural district and is compatible with future land use planning goals. The land use near the Project Area is not expected to change as a result of the Pipeline Project.³⁷¹

357. The pipeline Project will not disturb electric utilities and thus no disruptions to electrical service are anticipated.³⁷²

358. Natural gas services near the Project are provided by Minnesota Energy Resources. The Northern Border Pipeline carries natural gas through the area and will supply the generation Project with fuel.³⁷³

359. The pipeline is not anticipated to disrupt service; however, there is a marginal chance of a brief disruption of natural gas supply during the interconnect

³⁶⁸ Ex. XCEL-20 (Reply Comments – Completeness) (eDocket No. 20256-219889-01 to -02).

³⁶⁹ Minn. R. 7852.0700, subp. 2.

³⁷⁰ Ex. EIP-14 at 129 (EA) (eDocket No. 20261-226695-01).

³⁷¹ Ex. EIP-14 at 6 (EA) (eDocket No. 20261-226695-01).

³⁷² Ex. EIP-14 at 68 (EA) (eDocket No. 20261-226695-01).

³⁷³ Ex. EIP-14 at 68 (EA) (eDocket No. 20261-226695-01).

procedure. Any interruption would be localized to the area immediately downstream from the Project Area.³⁷⁴

360. Potential impacts to existing pipelines can be avoided and mitigated by coordination with the appropriate pipeline companies, which Xcel Energy will undertake as part of the natural gas pipeline connection process.³⁷⁵

B. Natural Environment

361. The pipeline Project is located in an agricultural field with no native vegetation, surface water resources, or public lands.³⁷⁶

362. During operation of the natural gas pipeline, air emissions will be minimal.³⁷⁷

363. The Draft Pipeline Routing Permit contains the following sections that address the natural environment: 7.7 (Noise); 7.8 (Site Sediment and Erosion Control), 7.9 (Topsoil Protection), 7.10 (Landscape Preservation), 7.11 (Sensitive Areas), 7.12 (Wetlands and Water Resources), 7.13 (Vegetation Management), 7.14 (Application of Pesticides), 7.15 (Invasive Species), 7.16 (Noxious Weeds), 7.21 (Pollution and Hazardous Wastes, 7.22 (Clean up), and 7.23 (Restoration).³⁷⁸

C. Lands of Historical, Archaeological, and Cultural Significance

364. No impacts to archaeological and historic resources are anticipated as a result of the Pipeline Project.³⁷⁹

D. Land Use Economies

365. Permanent impacts to agriculture as a result of the pipeline Project will include loss of farmland due to the construction of the pipeline through an agricultural field.

366. Impacts to agricultural operations have been mitigated by proposing the Project adjacent to the MNEC Project and the existing Northern Border Pipeline, which reduces the extent of impacts to agricultural property.³⁸⁰

³⁷⁴ Ex. EIP-14 at 68 (EA) (eDocket No. 20261-226695-01).

³⁷⁵ Ex. EIP-14 at 68 (EA) (eDocket No. 20261-226695-01).

³⁷⁶ Ex. EIP-14 at 129 (EA) (eDocket No. 20261-226695-01).

³⁷⁷ Ex. EIP-14 at 84 (EA) (eDocket No. 20261-226695-01).

³⁷⁸ Corrections to EA, Appendix G at 7-12 (eDocket No. 20263-229600-01).

³⁷⁹ Ex. EIP-14 at 129 (EA) (eDocket No. 20261-226695-01).

³⁸⁰ Ex. EIP-14 at 129 (EA) (eDocket No. 20261-226695-01).

E. Pipeline Cost and Accessibility

367. The costs of the pipeline have been minimized to the extent practical by locating the Pipeline Project adjacent to the MNEC Garvin substation and Northern Border Natural Gas Pipeline, which limits the need for additional pipeline.³⁸¹

F. Use of Existing Rights-of-Way and Right-of-Way Sharing or Paralleling

368. The pipeline Project is sited adjacent to the MNEC Project on land that will be owned by Xcel Energy.³⁸²

G. Impact on Natural Resources and Features

369. The Project is located in an agricultural field with no native vegetation, surface water resources, or public lands.³⁸³

H. Extent Human or Environmental Effects are Subject to Mitigation by Regulatory Control or Permit Conditions

370. The environmental impacts identified in the EA would be minimized through the conditions identified in the draft pipeline routing permit.³⁸⁴

I. Cumulative Potential Effects of Related or Anticipated Future Pipeline Construction

371. There are no anticipated cumulative potential effects related to future pipeline construction.³⁸⁵

J. Other Local, State, or Federal Rules and Regulations

372. The Project must adhere to all controlling policies, rules, and regulations of state, federal and local governments.³⁸⁶

IX. PIPELINE ROUTE PERMIT CONDITIONS

373. The Draft Pipeline Permit, as revised by PUC-EIP and Xcel Energy, includes several proposed permit conditions, many of which have been discussed above.

374. On February 11, 2026, the VMPWG recommended adapting permit condition 5.3.10 to a special permit condition requiring the applicant to develop a vegetation management plan for all areas not used for permanent facilities within the

³⁸¹ Ex. EIP-14 at 129 (EA) (eDocket No. 20261-226695-01).

³⁸² Ex. EIP-14 at 129 (EA) (eDocket No. 20261-226695-01).

³⁸³ Ex. EIP-14 at 129 (EA) (eDocket No. 20261-226695-01).

³⁸⁴ Ex. EIP-14 at 129 (EA) (eDocket No. 20261-226695-01).

³⁸⁵ Ex. EIP-14 at 130 (EA) (eDocket No. 20261-226695-01).

³⁸⁶ Ex. EIP-14 at 130 (EA) (eDocket No. 20261-226695-01).

entire project footprint and included proposed special condition permit language. VMPWG's proposed language is:³⁸⁷

5.3.10 Vegetation Management Plan

The Permittee shall develop a vegetation management plan (VMP), in coordination with the VMPWG, using best management practices established by the DNR and BWSR. The VMP shall address all areas not used for permanent facilities within the Lyon County Generating Station footprint. The Permittee shall file the VMP and documentation of the coordination efforts between the Permittee and the coordinating agencies with the Commission at least 14 days prior to the pre-construction meeting. The VMP must include the following information for the generation facilities (site) and the transmission lines and pipelines (routes):

- (a) management objectives addressing short term (year 0-5, seeding and establishment) and long term (year 5 through the life of the Project) goals for the site and routes;
- (b) a description of planned restoration and vegetation management activities, including how the site and routes will be prepared, timing of activities, how seeding will occur (e.g., broadcast, drilling, etc.), and the types of seed mixes and vegetation to be used, including:
 - a. temporary seed mixes and cover crops,
 - b. permanent seed mixes,
 - c. and native shrub species that will serve as windbreaks and snowbreaks along the boundaries of the project;
- (c) a description of how the site and routes will be monitored and evaluated to meet management goals;
- (d) a description of the management tools used to maintain vegetation (e.g., mowing, spot spraying, hand removal, etc.) within the site and routes, including the timing and frequency of maintenance activities;
- (e) identification of the third-party (e.g., consultant, contractor, site manager, etc.) contracted for restoration, monitoring, and long-term vegetation management of the site and routes;
- (f) identification of noxious weeds and invasive species (native and non-native) within the site and routes and the monitoring and management practices to be utilized; and
- (g) a marked-up copy of the project Site Plan and rights-of-way Plan and Profile showing how the site and routes will be revegetated and identifying the corresponding seed mixes and native shrub species.

³⁸⁷ VMPWG Comments (eDockets No. 20262-228073-01).

Best management practices should be followed concerning seed mixes, seeding rates, cover crops, and shrub selection.

375. The entirety of the Project area is currently in agricultural production and will be owned by Xcel Energy. The Project Area is approximately 155 acres in size, with permanent impacts on approximately 30 acres. The northern half of the Project area will also include the Garvin substation associated with MNEC. Xcel committed to restoring and revegetating the Project site (outside of the footprint of permanent facilities). Xcel Energy also proposed that, in lieu of the vegetation management plan required under Section 5.3.10, it instead provides a landscape/restoration diagram showing how the facility site will be revegetated after construction is completed.³⁸⁸ As noted above, Xcel's proposal is not recommended.

376. PUC-EIP supports the DNR's recommendation to include special permit conditions in the Pipeline Permit.³⁸⁹

377. Regarding Xcel Energy's proposal for a landscape/restoration diagram showing how the facility site will be revegetated after construction is completed, PUC-EIP does not believe that the information contained in a VMP could be appropriately contained in the proposed diagram.³⁹⁰ PUC-EIP recommends the Commission adopt the language proposed by the VMPWG.³⁹¹

378. The Judge finds PUC-EIP's proposed special condition for the Pipeline Permit is reasonable.

379. Xcel Energy and PUC-EIP agreed that Sections 6.4 (Agricultural Protection Plan), Sections 6.5 (Environmental Mitigation Plan), and Sections 7.10 (Soil Compaction) should be removed from the pipeline permit. They are inapplicable to this Project because of its limited geographic scope and location entirely on property that will be owned by Xcel Energy.³⁹² The draft permit does not include these sections.³⁹³

380. Xcel Energy also proposed modifying Section 6.3 (Status Reports) of the sample pipeline routing permit to require monthly, rather than weekly, status reporting, consistent with the reporting requirements in the Site and Route Permits.³⁹⁴ PUC-EIP stated it was supportive of the edits to Section 6.3 and modified it in the Draft Permit as follows:

³⁸⁸ Xcel Energy Response to Hearing Comments at 2 (eDocket No. 20262-228410-01).

³⁸⁹ PUC EIP Comments on Proposed Findings of Fact at 2-3 (eDocket No. 20262-228719-01).

³⁹⁰ PUC EIP Comments on Proposed Findings of Fact at 4 (eDocket No. 20262-228719-01).

³⁹¹ PUC EIP Comments on Proposed Findings of Fact at 3 (eDocket No. 20262-228719-01).

³⁹² Xcel Energy Proposed Findings of Fact at 80 (eDocket No. 20262-228410-02); PUC EIP Comments on Proposed Findings of Fact at 5 (eDocket No. 20262-228719-01).

³⁹³ Corrections to EA, Appendix G (eDocket No. 20263-229600-01).

³⁹⁴ Xcel Energy Proposed Findings of Fact at 80 (eDocket No. 20262-228410-02).

6.3 Status Reports

The Permittee shall report to the Commission on progress during finalization of the route and construction of the pipeline. The Permittee shall report ~~weekly~~ monthly. Reports shall begin with the submittal of the plan and profile for the project and continue until completion of restoration.³⁹⁵

381. The Judge finds that modification of Section 6.3 (Status Reports) in the Draft Pipeline Permit is reasonable.

Based on the foregoing findings of fact and the record in this proceeding, the Judge makes the following:

CONCLUSIONS OF LAW

I. CONCLUSIONS APPLICABLE TO ALL APPLICATIONS

1. Any of the foregoing findings of fact more properly designated as conclusions of law are hereby adopted as such. Any of the conclusions of law which are more properly designated findings of fact are hereby adopted as such.

2. The Commission and the Administrative Law Judge have jurisdiction over the Site Permit and Route Permit applied for by Xcel Energy for the proposed Project pursuant to Minn. Stat. § 216E.03.

3. The Commission and the Judge have jurisdiction over the Certificate of Need applied for by Xcel Energy for the proposed Project pursuant to Minn. Stat. § 216B.243.

4. The Commission and the Judge have jurisdiction over the Pipeline Permit pursuant to Minn. Stat. §§ 216G.02, .13 (2024), Minn. R. 7852.0700, .1800 (2025).

5. The Applicant, the Commission, and PUC-EIP provided all notices required under Minnesota Statutes and Rules for the Applications and have substantially complied with the procedural requirements of Minn. Stat. Ch. 216B, Minn. Stat. Ch. 216E, and Minn. R. Ch. 7849, 7850 and 7852.

6. PUC-EIP has conducted an appropriate environmental analysis of the Project, and the EA satisfies Minn. R. 7850.3700, 7849.1800, subp. 2, and 7850.3900, subp. 2. Specifically, the EA and the record address the issues identified in the Scoping Decision to a reasonable extent considering the availability of information, the EA includes the items required by Minn. R. 7850.3700, subp. 4, and was prepared in compliance with the procedures in Minn. R. 7849.1900 and 7850.3700.

7. The Project, with the permit conditions discussed above, is not likely to cause pollution, impairment, or destruction of the air, water, land or other natural

³⁹⁵ Corrections to EA, Appendix G (eDocket No. 20263-229600-01).

resources located within the state as those terms are used in the Minnesota Environmental Rights Act and/or the Minnesota Environmental Policy Act.³⁹⁶

8. Public hearings were held on January 26, 2026 (in-person in Lyon County) and January 27, 2026 (remote-access). Proper notice of the public hearing was provided. The public was given the opportunity to speak at the hearing and to submit written comments. All procedural requirements for the Site Permit, Route Permit, and CN were met.

II. CONCLUSIONS APPLICABLE TO CERTIFICATE OF NEED APPLICATION

9. The record in this proceeding demonstrates that Xcel Energy has satisfied the criteria for a CN set forth in Minn. Stat. § 216B.243 and Minn. R. 7849.0120.

10. The record in this proceeding also demonstrates that Xcel Energy has satisfied other applicable relevant statutory criteria set forth in Minn. Stat. § 216B.1691 (renewable energy standards) and Minn. Stat. § 216B.2426 (distributed generation).

11. No party or person has demonstrated by a preponderance of the evidence that there is a more reasonable and prudent alternative to address those needs met by the Project.

12. No conditions on the CN are necessary.

III. CONCLUSIONS APPLICABLE TO SITE PERMIT APPLICATION

13. The Commission has the authority under Minn. Stat. §§ 216E.03, and 21G.02 to place conditions in a LEPGP site permit, HVTL route permit, and pipeline routing permit.

14. The record in this proceeding demonstrates that Xcel Energy has satisfied the criteria for a site permit as set forth in Minn. Stat. § 216E.03 and Minn. R. Ch. 7850 and all other applicable legal requirements.

15. The Project, with the permit conditions discussed above, satisfies the site permit criteria for an LEPGP in Minn. Stat. § 216E.03 and meets all other applicable legal requirements.

IV. CONCLUSIONS APPLICABLE TO ROUTE PERMIT APPLICATION

16. The record in this proceeding demonstrates that Xcel Energy has satisfied the criteria for a route permit as set forth in Minn. Stat. § 216E.03 and Minn. R. Ch. 7850 and all other applicable legal requirements.

³⁹⁶ See Minn. Stat. §§ 116B.01-116B.13, 116D.01-116D.11.

17. The Project, with the permit conditions discussed above, satisfies the route permit criteria for an HVTL in Minn. Stat. § 216E.03 and meets all other applicable requirements.

V. CONCLUSIONS APPLICABLE TO PARTIAL EXEMPTION FROM PIPELINE ROUTE

18. The record in this proceeding demonstrates that Xcel Energy has satisfied the criteria for a partial exemption from pipeline route selection procedures as set forth in Minn. R. 7852.0700.

19. The Pipeline Project, with the permit conditions discussed above, satisfies the applicable criteria for a pipeline in Minn. Stat. § 216G.02 and Minn. R. Ch. 7852 and meets all other applicable requirements.

VI. CONCLUSIONS APPLICABLE TO THE EA

20. The Commission must determine whether the EA and the record address the issues identified in the scoping decision when the final decision on a permit application is made.³⁹⁷

21. The EA and the record address the issues identified in the scoping decision.

Based on the findings of fact and conclusions of law contained herein and the entire record of this proceeding, the Judge hereby makes the following:

RECOMMENDATION

The Commission should issue a Certificate of Need, Site Permit, Transmission Line Route Permit, and Partial Exemption and Pipeline Routing Permit to Xcel Energy to construct and operate the Project and associated facilities in Lyon County, Minnesota, consistent with the findings in this report. The Commission should also determine that the EA and the record address the issues identified in the scoping decision.

Date: March 30, 2026



JIM MORTENSON
Administrative Law Judge

NOTICE

Notice is hereby given that exceptions to this Report, if any, by any party adversely affected must be filed no later than April 13, 2026, unless otherwise directed by the

³⁹⁷ Minn. R. 7850.3900, subp. 2 (2023).

Commission. Exceptions should be specific and stated and numbered separately. Oral argument before a majority of the Commission will be permitted as provided under Minn. R. 7829.2700, subp. 3. The Commission will make the final determination of the matter after the expiration of the period for filing exceptions, or after oral argument, if an oral argument is held.

The Commission may, at its own discretion, accept, modify, or reject the Judge's recommendations. The recommendations of the Judge have no legal effect unless expressly adopted by the Commission as its final order.

March 30, 2026

See Attached Service List

Re: *In the Matter of the Application of Xcel Energy for a Certificate of need, Site Permit, Route Permit and Pipeline Route Permit for the Lyon County Generating Station in Lyon County, Minnesota*

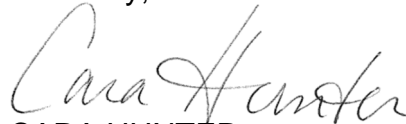
**CAH 5-2500-41123
MPUC E-002/CN-25-145, TL-25-161
MPUC G002/GS-25-154, GP-25-163**

To All Persons on the Attached Service List:

Enclosed and served upon you is the Administrative Law Judge's **FINDINGS OF FACT, CONCLUSIONS OF LAW AND RECOMMENDATIONS** in the above-entitled matter.

If you have any questions, please contact me at (651) 361-7970, cara.hunter@state.mn.us, or via facsimile at (651) 539-0310.

Sincerely,



CARA HUNTER
Legal Assistant

Enclosure

cc: Docket Coordinator

STATE OF MINNESOTA
COURT OF ADMINISTRATIVE HEARINGS
PO BOX 64620
600 NORTH ROBERT STREET
ST. PAUL, MINNESOTA 55164

CERTIFICATE OF SERVICE

In the Matter of the Application of Xcel Energy for a Certificate of need, Site Permit, Route Permit and Pipeline Route Permit for the Lyon County Generating Station in Lyon County, Minnesota	CAH Docket No.: 5-2500-41123 MPUC E-002/CN-25-145, TL-25-161 MPUC G002/GS-25-154, GP-25-163
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On March 30, 2026, a true and correct copy of the **FINDINGS OF FACT, CONCLUSIONS OF LAW AND RECOMMENDATIONS** was served by eService, and United States mail, (in the manner indicated on the attached service list) to the following individuals:

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Lisa	Agrimonti	lagrimonti@fredlaw.com	Fredrikson & Byron, P.A.		60 South Sixth Street Suite 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	25-145 Official CC Service List
2	John	Bornhoft	john@buffaloridgeconcrete.com				Electronic Service		No	25-145 Official 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	25-145 Official CC Service List
4	Deb	Dirlam	deb.dirlam@lowersioux.com	Lower Sioux Indian Community		PO Box 308 39527 Reservation Highway 1 Morton MN, 56270 United States	Electronic Service		No	25-145 Official CC Service List
5	Martin	Donovan	martin.donovan@state.mn.us		Department of Natural Resources	500 Lafayette Road St Paul MN, 55155 United States	Electronic Service		No	25-145 Official CC Service List
6	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	25-145 Official CC Service List
7	Dalton	Hannasch	dalton@buffaloridgeconcrete.com				Electronic Service		No	25-145 Official CC Service List
8	Craig	Janezich	craig.janezich@state.mn.us		Public Utilities Commission	121 7th Pl E #350 St. Paul MN, 55101 United States	Electronic Service		No	25-145 Official CC Service List
9	Breann	Jurek	bjurek@fredlaw.com	Fredrikson & Byron PA		60 S Sixth St Ste 1500 Minneapolis MN, 55402 United States	Electronic Service		No	25-145 Official CC Service List
10	Stacy	Kotch Egstad	stacy.kotch@state.mn.us		Minnesota Department of Transportation	395 John Ireland Blvd MS 678 St. Paul MN, 55155 United States	Electronic Service		No	25-145 Official CC Service List
11	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	25-145 Official CC Service List
12	James	Mortenson	james.mortenson@state.mn.us		Office of Administrative Hearings	PO BOX 64620 St. Paul MN, 55164-0620 United States	Electronic Service		Yes	25-145 Official CC Service List
13	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	25-145 Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
14	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	25-145 Official CC Service List
15	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	25-145 Official CC Service List
16	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix & Associates		7400 Lyndale Avenue South Suite 190 Richfield MN, 55423 United States	Electronic Service		Yes	25-145 Official CC Service List
17	Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	25-145 Official CC Service List
18	Melissa	Sheffer	sheffer.melissa@epa.gov	EPA Region 5			Electronic Service		No	25-145 Official CC Service List
19	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	25-145 Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Kevin	Adams	kadams@caprw.org	Community Action Partnership of Ramsey & Washington Counties		450 Syndicate St N Ste 35 Saint Paul MN, 55104 United States	Electronic Service		No	25-154 Official CC Service List
2	Lisa	Agrimonti	lagrimonti@fredlaw.com	Fredrikson & Byron, P.A.		60 South Sixth Street Suite 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	25-154 Official CC Service List
3	Justin	Andringa	justin.andringa@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St Paul MN, 55101 United States	Electronic Service		No	25-154 Official CC Service List
4	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	25-154 Official CC Service List
5	Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy		414 Nicollet Mall Fl 5 Minneapolis MN, 55401 United States	Electronic Service		No	25-154 Official CC Service List
6	Gail	Baranko	gail.baranko@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	25-154 Official CC Service List
7	Jessica L	Bayles	jessica.bayles@stoel.com	Stoel Rives LLP		1150 18th St NW Ste 325 Washington DC, 20036 United States	Electronic Service		No	25-154 Official CC Service List
8	Elizabeth	Brama	ebrama@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	25-154 Official CC Service List
9	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	25-154 Official CC Service List
10	James	Canaday	james.canaday@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota St. St. Paul MN, 55101 United States	Electronic Service		No	25-154 Official CC Service List
11	Olivia	Carroll	oliviacc@ubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St W1360 St. Paul MN, 55101 United States	Electronic Service		No	25-154 Official CC Service List
12	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St, Louis MO, 63119-2044 United States	Electronic Service		No	25-154 Official CC Service List
13	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General -	445 Minnesota Street Suite	Electronic Service		Yes	25-154 Official CC

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
					Department of Commerce	1400 St. Paul MN, 55101 United States				Service List
14	Brandon	Crawford	brandonc@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 St. Paul MN, 55101 United States	Electronic Service		No	25-154 Official CC Service List
15	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	25-154 Official CC Service List
16	James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	25-154 Official CC Service List
17	Ian M.	Dobson	ian.m.dobson@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	25-154 Official CC Service List
18	Martin	Donovan	martin.donovan@state.mn.us		Department of Natural Resources	500 Lafayette Road St Paul MN, 55155 United States	Electronic Service		No	25-154 Official CC Service List
19	Richard	Dornfeld	richard.dornfeld@ag.state.mn.us		Office of the Attorney General - Department of Commerce	Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul MN, 55101 United States	Electronic Service		No	25-154 Official CC Service List
20	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	25-154 Official CC Service List
21	Rebecca	Eilers	rebecca.d.eilers@xcelenergy.com	Xcel Energy		414 Nicollet Mall - 401 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	25-154 Official CC Service List
22	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	25-154 Official CC Service List
23	Eden	Faure	eden.faure@stoel.com	Stoel Rives LLP		33 S. 6th Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	25-154 Official CC Service List
24	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	25-154 Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
25	Lucas	Franco	lfranco@liunagroc.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	25-154 Official CC Service List
26	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	25-154 Official CC Service List
27	Allen	Gleckner	agleckner@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	25-154 Official CC Service List
28	Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY		401 Nicollet Mall FL 8 Minneapolis MN, 55401 United States	Electronic Service		No	25-154 Official CC Service List
29	Shubha	Harris	shubha.m.harris@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401 - FL 8 Minneapolis MN, 55401 United States	Electronic Service		No	25-154 Official CC Service List
30	Amber	Hedlund	amber.r.hedlund@xcelenergy.com	Northern States Power Company dba Xcel Energy-Elec		414 Nicollet Mall, 401-7 Minneapolis MN, 55401 United States	Electronic Service		No	25-154 Official CC Service List
31	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	25-154 Official CC Service List
32	Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St Suite 1400 St. Paul MN, 55101-2134 United States	Electronic Service		No	25-154 Official CC Service List
33	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	25-154 Official CC Service List
34	Amrit	Hundal	amrit.hundal@ag.state.mn.us		Office of the Attorney General - Department of Commerce		Electronic Service		No	25-154 Official CC Service List
35	Craig	Janezich	craig.janezich@state.mn.us		Public Utilities Commission	121 7th PI E #350 St. Paul MN, 55101 United States	Electronic Service		No	25-154 Official CC Service List
36	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	25-154 Official CC Service List
37	Richard	Johnson	rickjohnson@cozen.com	Cozen O'Connor		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	25-154 Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
38	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	25-154 Official CC Service List
39	Breann	Jurek	bjurek@fredlaw.com	Fredrikson & Byron PA		60 S Sixth St Ste 1500 Minneapolis MN, 55402 United States	Electronic Service		No	25-154 Official CC Service List
40	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	25-154 Official CC Service List
41	Brad	Klein	bklein@elpc.org	Environmental Law & Policy Center		35 E Wacker Drive Suite 1600 Chicago IL, 60302 United States	Electronic Service		No	25-154 Official CC Service List
42	Stacy	Kotch Egstad	stacy.kotch@state.mn.us		Minnesota Department of Transportation	395 John Ireland Blvd MS 678 St. Paul MN, 55155 United States	Electronic Service		No	25-154 Official CC Service List
43	Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S 8th St Minneapolis MN, 55402 United States	Electronic Service		No	25-154 Official CC Service List
44	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	25-154 Official CC Service List
45	Amber	Lee	amber.lee@stoel.com	Stoel Rives LLP		33 S. 6th Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	25-154 Official CC Service List
46	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	25-154 Official CC Service List
47	Ryan	Long	ryan.j.long@xcelenergy.com			414 Nicollet Mall 401 8th Floor Minneapolis MN, 55401 United States	Electronic Service		No	25-154 Official CC Service List
48	Alice	Madden	alice@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	25-154 Official CC Service List
49	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	25-154 Official CC Service List
50	Robert	Manning	robert.manning@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 Saint Paul	Electronic Service		No	25-154 Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55101 United States				
51	Ashley	Marcus	ashley.marcus@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	25-154 Official CC Service List
52	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	25-154 Official CC Service List
53	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	25-154 Official CC Service List
54	Erica	McConnell	emcconnell@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	25-154 Official CC Service List
55	Greg	Merz	greg.merz@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	25-154 Official CC Service List
56	Hirsi	Mohamed	hirsi.mohamed@state.mn.us		Public Utilities Commission	121 7th Place E, Suite 350 Saint Paul MN, 55101 United States	Electronic Service		No	25-154 Official CC Service List
57	Marta	Monti	marta@energycents.org	Energy CENTS Coalition		823 E. 7th Street St. Paul MN, 55106 United States	Electronic Service		No	25-154 Official CC Service List
58	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	25-154 Official CC Service List
59	James	Mortenson	james.mortenson@state.mn.us		Office of Administrative Hearings	PO BOX 64620 St. Paul MN, 55164-0620 United States	Electronic Service		Yes	25-154 Official CC Service List
60	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	25-154 Official CC Service List
61	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	25-154 Official CC Service List
62	Wendy	Raymond	wendy.raymond@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota Street Suite 600 St. Paul MN, 55101 United States	Electronic Service		No	25-154 Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
63	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	25-154 Official CC Service List
64	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	25-154 Official CC Service List
65	Amanda	Rome	amanda.rome@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 5 Minneapolis MN, 55401 United States	Electronic Service		No	25-154 Official CC Service List
66	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	25-154 Official CC Service List
67	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	25-154 Official CC Service List
68	Peter	Scholtz	peter.scholtz@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota Street St. Paul MN, 55101-2131 United States	Electronic Service		No	25-154 Official CC Service List
69	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix & Associates		7400 Lyndale Avenue South Suite 190 Richfield MN, 55423 United States	Electronic Service		Yes	25-154 Official CC Service List
70	George	Shardlow	george@energycents.org	Energy CENTS Coalition		823 E. 7th Street Saint Paul MN, 55106 United States	Electronic Service		No	25-154 Official CC Service List
71	Melissa	Sheffer	sheffer.melissa@epa.gov	EPA Region 5			Electronic Service		No	25-154 Official CC Service List
72	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	25-154 Official CC Service List
73	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	25-154 Official CC Service List
74	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	25-154 Official CC Service List
75	Byron E.	Stams	byron.stams@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis	Electronic Service		No	25-154 Official CC

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55402 United States				Service List
76	Scott	Strand	sstrand@elpc.org	Environmental Law & Policy Center		60 S 6th Street Suite 2800 Minneapolis MN, 55402 United States	Electronic Service		No	25-154 Official CC Service List
77	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	25-154 Official CC Service List
78	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	25-154 Official CC Service List
79	Anthony	Willingham	anthony.willingham@electrifyamerica.com	Electrify America		1950 Opportunity Way Suite 1500 Reston VA, 20190 United States	Electronic Service		No	25-154 Official CC Service List
80	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	25-154 Official CC Service List
81	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	25-154 Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Lisa	Agrimonti	lagrimonti@fredlaw.com	Fredrikson & Byron, P.A.		60 South Sixth Street Suite 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	25-161 Official CC Service List
2	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	25-161 Official CC Service List
3	Martin	Donovan	martin.donovan@state.mn.us		Department of Natural Resources	500 Lafayette Road St Paul MN, 55155 United States	Electronic Service		No	25-161 Official CC Service List
4	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	25-161 Official CC Service List
5	Craig	Janezich	craig.janezich@state.mn.us		Public Utilities Commission	121 7th Pl E #350 St. Paul MN, 55101 United States	Electronic Service		No	25-161 Official CC Service List
6	Breann	Jurek	bjurek@fredlaw.com	Fredrikson & Byron PA		60 S Sixth St Ste 1500 Minneapolis MN, 55402 United States	Electronic Service		No	25-161 Official CC Service List
7	Stacy	Kotch Egstad	stacy.kotch@state.mn.us		Minnesota Department of Transportation	395 John Ireland Blvd MS 678 St. Paul MN, 55155 United States	Electronic Service		No	25-161 Official CC Service List
8	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	25-161 Official CC Service List
9	James	Mortenson	james.mortenson@state.mn.us		Office of Administrative Hearings	PO BOX 64620 St. Paul MN, 55164-0620 United States	Electronic Service		Yes	25-161 Official CC Service List
10	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	25-161 Official CC Service List
11	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	25-161 Official CC Service List
12	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix & Associates		7400 Lyndale Avenue South Suite 190 Richfield MN, 55423 United States	Electronic Service		Yes	25-161 Official CC Service List
13	Haley	Waller Pitts	hwallerpitts@fredlaw.com	Fredrikson & Byron, P.A.		60 S Sixth St Ste 1500 Minneapolis MN, 55402-	Electronic Service		No	25-161 Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						4400 United States				

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Kevin	Adams	kadams@caprw.org	Community Action Partnership of Ramsey & Washington Counties		450 Syndicate St N Ste 35 Saint Paul MN, 55104 United States	Electronic Service		No	25-163 Official CC Service List
2	Lisa	Agrimonti	lagrimonti@fredlaw.com	Fredrikson & Byron, P.A.		60 South Sixth Street Suite 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	25-163 Official CC Service List
3	Justin	Andringa	justin.andringa@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St Paul MN, 55101 United States	Electronic Service		No	25-163 Official CC Service List
4	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	25-163 Official CC Service List
5	Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy		414 Nicollet Mall FI 5 Minneapolis MN, 55401 United States	Electronic Service		No	25-163 Official CC Service List
6	Gail	Baranko	gail.baranko@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	25-163 Official CC Service List
7	Jessica L	Bayles	jessica.bayles@stoel.com	Stoel Rives LLP		1150 18th St NW Ste 325 Washington DC, 20036 United States	Electronic Service		No	25-163 Official CC Service List
8	Elizabeth	Brama	ebrama@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	25-163 Official CC Service List
9	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	25-163 Official CC Service List
10	James	Canaday	james.canaday@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota St. St. Paul MN, 55101 United States	Electronic Service		No	25-163 Official CC Service List
11	Olivia	Carroll	oliviac@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St W1360 St. Paul MN, 55101 United States	Electronic Service		No	25-163 Official CC Service List
12	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St, Louis MO, 63119-2044 United States	Electronic Service		No	25-163 Official CC Service List
13	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General -	445 Minnesota Street Suite	Electronic Service		Yes	25-163 Official CC

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
					Department of Commerce	1400 St. Paul MN, 55101 United States				Service List
14	Brandon	Crawford	brandonc@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 St. Paul MN, 55101 United States	Electronic Service		No	25-163 Official CC Service List
15	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	25-163 Official CC Service List
16	James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	25-163 Official CC Service List
17	Ian M.	Dobson	ian.m.dobson@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	25-163 Official CC Service List
18	Martin	Donovan	martin.donovan@state.mn.us		Department of Natural Resources	500 Lafayette Road St Paul MN, 55155 United States	Electronic Service		No	25-163 Official CC Service List
19	Richard	Dornfeld	richard.dornfeld@ag.state.mn.us		Office of the Attorney General - Department of Commerce	Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul MN, 55101 United States	Electronic Service		No	25-163 Official CC Service List
20	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	25-163 Official CC Service List
21	Rebecca	Eilers	rebecca.d.eilers@xcelenergy.com	Xcel Energy		414 Nicollet Mall - 401 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	25-163 Official CC Service List
22	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	25-163 Official CC Service List
23	Eden	Faure	eden.faure@stoel.com	Stoel Rives LLP		33 S. 6th Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	25-163 Official CC Service List
24	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	25-163 Official CC Service List

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58	James	Mortenson	james.mortenson@state.mn.us		Office of Administrative Hearings	PO BOX 64620 St. Paul MN, 55164-0620 United States	Electronic Service		Yes	25-163 Official CC Service List
59	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	25-163 Official CC Service List
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62	Wendy	Raymond	wendy.raymond@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota Street Suite 600 St. Paul MN, 55101 United States	Electronic Service		No	25-163 Official CC Service List
63	Generic Notice	Residential Utilities	residential.utilities@ag.state.mn.us		Office of the Attorney	1400 BRM Tower	Electronic Service		Yes	25-163 Official

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