

Surrebuttal Testimony and Schedules
Matthew Langan

Before the Minnesota Public Utilities Commission
State of Minnesota

In the Matter of the Application of Xcel Energy for a Route Permit for the Minnesota
Energy Connection Project in Sherburne, Stearns, Kandiyohi, Wright, Meeker,
Chippewa, Yellow Medicine, Renville, Redwood, and Lyon Counties in Minnesota

Docket No. E002/TL-22-132
OAH Docket No. 23-2500-39782

**Surrebuttal Testimony of Matthew Langan
on behalf of
Xcel Energy**

October 22, 2024

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Schedules

September 25, 2024, Correspondence from State Historic Preservation Office	Schedule 1
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I. INTRODUCTION

Q. PLEASE STATE YOUR NAME.

A. My name is Matthew Langan.

Q. DID YOU PREVIOUSLY PROVIDE DIRECT TESTIMONY IN THIS CASE?

A. Yes. I provided Direct Testimony on behalf of Northern States Power Company, doing business as Xcel Energy (Xcel Energy).

Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY?

A. The purpose of my Surrebuttal Testimony is to: (1) provide an update on Xcel Energy's coordination with the Minnesota State Historic Preservation Office (SHPO) and interested Tribal Nations related to the Project; (2) discuss Xcel Energy's general comments regarding the Draft Environmental Impact Statement (DEIS); and (3) discuss the Sample Route Permit filed by the Department of Commerce, Energy Environmental Review and Analysis (EERA) as Appendix F to the DEIS.

Q. WHY ARE YOU PROVIDING SURREBUTTAL TESTIMONY NOW?

A. I am providing this Surrebuttal Testimony to provide additional information that may be useful or of interest to the Administrative Law Judge and stakeholders in advance of the upcoming public meetings and hearings in this case.

Q. ARE YOU SPONSORING ANY SCHEDULES?

A. Yes. The following schedules are attached to my testimony:

- Schedule 1: September 25, 2024, Correspondence from SHPO
- Schedule 2: Route Alternatives Analysis (updated)

II. UPDATE ON COORDINATION WITH SHPO & INTERESTED TRIBES

Q. IN YOUR DIRECT TESTIMONY, YOU DESCRIBED XCEL ENERGY'S CONSULTATION WITH SHPO PURSUANT TO THE MINNESOTA PUBLIC UTILITIES COMMISSION'S (COMMISSION) DIRECTIVE. DO YOU HAVE AN UPDATE?

A. Yes. My September 6, 2024, Direct Testimony stated that Xcel Energy submitted a Phase Ia archaeological assessment and proposed survey plan to SHPO in July 2024.¹ On September 25, 2024, SHPO provided correspondence stating that it had reviewed the Phase Ia archaeological assessment and the proposed survey plan and agreed that the survey plan is appropriate. This correspondence is attached as **Schedule 1** to my Surrebuttal Testimony. SHPO further stated that it looks forward to reviewing the results of the Phase I survey when they become available.

Q. WILL XCEL ENERGY PROVIDE SHPO WITH THE RESULTS OF THE PHASE I SURVEY WHEN THEY BECOME AVAILABLE?

A. Yes. Xcel Energy will prepare a report documenting results of the Phase I survey after each survey season has been completed and will share those survey results with SHPO on an annual basis, starting in 2025.

¹ Direct Testimony of Matthew Langan at 20-21(Sept. 6, 2024) (eDocket No. [20249-210020-02](#)) (Langan Direct).

1 Q. WILL XCEL ENERGY ALSO SHARE THE RESULTS OF THE PHASE I SURVEY WITH
2 INTERESTED TRIBAL NATIONS?

3 A. Yes. Xcel Energy will continue to coordinate with representatives of interested
4 Tribal Nations, including by providing the results of the Phase I survey. Most
5 recently, Xcel Energy has contacted the Upper Sioux Community and the
6 Lower Sioux Indian Community to discuss the DEIS, public hearing schedule,
7 and the associated comment periods.
8

9 III. REVIEW OF DEIS 10

11 Q. HAVE YOU REVIEWED THE DEIS?

12 A. Yes, I have reviewed the DEIS. In this Surrebuttal Testimony, I will discuss
13 Xcel Energy's comments on the DEIS that, in my view, could be helpful to
14 stakeholders in advance of the upcoming public hearings in this case. I note
15 that the deadline to submit comments on the DEIS is November 25, 2024,
16 and Xcel Energy may submit additional comments on the DEIS by that date.
17

18 Q. PLEASE DESCRIBE HOW THE DEIS ASSESSES RESIDENTIAL PROXIMITY, AS
19 COMPARED TO XCEL ENERGY'S ROUTE PERMIT APPLICATION.

20 A. The DEIS assesses residential proximity for the routes under consideration at
21 up to 1,600 feet.² In contrast, the Route Permit Application assessed
22 residential proximity at up to 500 feet.³
23

² DEIS at 74 (Oct. 8, 2024) (eDocket No. [202410-210801-01](#)) (DEIS).

³ Route Permit Application at 79 (Oct. 30, 2023) (eDocket No. [202310-199981-02](#)).

1 Q. WHY DID THE ROUTE PERMIT APPLICATION ASSESS RESIDENTIAL PROXIMITY
2 AT THOSE DISTANCES?

3 A. When developing Project routes, Xcel Energy focused our analysis on
4 residences within 500 feet of a potential alignment because, during public
5 outreach, we heard repeatedly from members of the public that residential
6 proximity should be of primary consideration. Thus, avoiding residences
7 within 0-75 feet was of utmost importance, followed by residences within 76-
8 150 feet, and so on. We did not use residences from 500-1,600 feet from an
9 alignment as a factor to distinguish among routes given that residential
10 proximity impacts dissipate, as noted in the DEIS.⁴ Our analysis of the
11 Preferred Route in my Direct Testimony assessed residential proximity at the
12 same distances.⁵

13
14 Q. HAVE YOU ALSO ASSESSED RESIDENTIAL PROXIMITY ON THE PREFERRED
15 ROUTE USING THE SAME DISTANCES AS THE DEIS?

16 A. Yes. There are 146 residences within 0-500 feet of the Preferred Route, and
17 317 residences within 500-1,600 feet. Thus, the Preferred Route is comparable
18 to the Blue Route with respect to residential proximity, and compares
19 favorably to the Purple Route, as well as Route Options C and D.

20
21 Q. THE DEIS ALSO ANALYZES PROXIMITY TO NON-RESIDENTIAL STRUCTURES.
22 HOW DID XCEL ENERGY CONSIDER PROXIMITY TO NON-RESIDENTIAL
23 STRUCTURES IN ITS ROUTE DEVELOPMENT?

24 A. For non-residential structures, Xcel Energy developed routes to minimize
25 structures within the Project's 150-foot right-of-way. Where avoiding non-

⁴ DEIS at 198.

⁵ Langan Direct at 16.

1 residential structures entirely was not feasible, the routes were developed such
2 that there is sufficient clearance between the conductors and the building to
3 comply with applicable standards. Based on Xcel Energy's early and ongoing
4 outreach efforts, proximity to residential structures is of greater importance to
5 stakeholders than non-residential structures.

6
7 Q. THE DEIS STATES "NON-RESIDENTIAL STRUCTURES ARE PRESENT WITHIN
8 THE ROW AND COULD POTENTIALLY STAY IF THE ACTIVITIES TAKING PLACE
9 IN THESE BUILDINGS ARE COMPATIBLE WITH THE SAFE OPERATION OF THE
10 LINE."⁶ DO YOU AGREE?

11 A. Yes, certain non-residential structures can be located within the right-of-way
12 provided there is sufficient clearance between the structure and the
13 transmission line. These distances are dictated by the National Electric Safety
14 Code.

15
16 Q. THE DEIS STATES THAT THE LUX STRIP AIRPORT IS A PRIVATELY-OWNED
17 GRASS AIRSTRIP THAT WOULD BE IMPACTED BY ROUTE SEGMENTS C2, C3, AND
18 C4 (BLUE ROUTE), BUT THAT IMPACTS COULD BE AVOIDED BY ROUTE 223.⁷
19 DOES XCEL ENERGY SUPPORT INCLUDING ROUTE 223?

20 A. Xcel Energy does not support incorporating the entirety of Route 223 into
21 the Preferred Route because it would increase impacts to residences on the
22 southern portion of the route segment alternative. However, in my Direct
23 Testimony, I included a modified version of Route 223 that minimizes impacts
24 to the airstrip without a corresponding increase in impacts on residences.⁸

⁶ DEIS at 8.

⁷ DEIS at 10.

⁸ Langan Direct at 11-14.

1 Xcel Energy does not object to modified Route 223 being included in the
2 Project's route.

3
4 Q. THE DEIS NOTES THAT SPECIFIC LOCATIONS FOR THE INTERMEDIATE AND
5 VOLTAGE SUPPORT SUBSTATIONS ARE NOT YET KNOWN.⁹ WHAT PROCESS
6 DOES XCEL ENERGY ANTICIPATE WILL BE USED TO FINALIZE SUBSTATION
7 LOCATIONS?

8 A. Xcel Energy is seeking to voluntarily acquire property for the intermediate and
9 voltage support substations. Those efforts will focus on properties where
10 impacts to wetlands, sensitive resources, and vegetation clearing can generally
11 be minimized, and where appropriate distances from existing residences can
12 be maintained. Final substation locations will depend upon the overall Project
13 route ultimately selected by the Commission. Xcel Energy anticipates that the
14 substation locations will be within the route widths studied in the DEIS, and
15 Xcel Energy will identify the final substation locations (at the latest) in the
16 plan and profile submissions required under Section 9.2 of the Sample Route
17 Permit prior to commencing construction.

18
19 Q. THE DEIS STATES THAT THE BLUE ROUTE (SEGMENT G1) WOULD REQUIRE
20 FURTHER COORDINATION WITH THE CITY OF SAINT AUGUSTA BECAUSE OF
21 POTENTIAL IMPACTS TO A RESIDENTIAL DEVELOPMENT.¹⁰ DO YOU HAVE A
22 RESPONSE?

23 A. Yes. As stated in the Route Permit Application, the Blue Route generally
24 avoids residential areas within the city and parallels parcel boundaries and field
25 edges to the extent practicable. The main population center of Saint Augusta

⁹ DEIS at 45.

¹⁰ DEIS at 9, 99.

1 is approximately 1.5 miles north of the Blue Route. The DEIS indicates that
2 its analysis is based upon a scoping comment submitted by a city council
3 member.¹¹ Xcel Energy is aware of plans for residential development near the
4 City of Saint Augusta and designed the Blue Route's alignment to avoid the
5 residential development. Regardless, Xcel Energy will continue to coordinate
6 with the City as plans move forward.

7
8 Q. THE DEIS IDENTIFIES A POTENTIAL CHRISTMAS TREE FARM WITHIN THE
9 ROUTE WIDTH OF ROUTE SEGMENT 244.¹² IS ROUTE SEGMENT 244 PART OF
10 XCEL ENERGY'S PREFERRED ROUTE?

11 A. Yes. Route Segment 244 was proposed by the Minnesota Department of
12 Natural Resources (MDNR), and as discussed in my Direct Testimony, Xcel
13 Energy supports inclusion of that route in the Preferred Route.¹³ The DEIS
14 states that it was made aware of the potential Christmas tree farm after the
15 scoping decision was issued, and that the farm is within the route width of
16 Route Segment 244. The specific location of the potential Christmas tree farm
17 is unknown to me, and it is unclear whether the farm is also within the
18 proposed right-of-way for this alternative. To the extent there is a Christmas
19 tree farm within the right-of-way of the Project route selected by the
20 Commission, Xcel Energy will work with the landowner to attempt to
21 minimize and/or mitigate potential impacts.

22
23 Q. THE DEIS NOTES THAT A NO-EFFECT CONCURRENCE DECISION FROM
24 MDNR WOULD BE REQUIRED FOR ANY ROUTES WITHIN FIVE MILES OF THE

¹¹ DEIS at 95.

¹² DEIS at 133.

¹³ Langan Direct at 15.

1 GENNESSEE 21 FEN.¹⁴ IS THE PREFERRED ROUTE WITHIN FIVE MILES OF THIS
2 FEN?

3 A. No. The Purple Route is within five miles of this fen. Neither the Blue Route
4 nor the Preferred Route are within five miles of any fen.
5

6 Q. AFTER REVIEWING THE DEIS, DO YOU STILL BELIEVE THE PREFERRED
7 ROUTE BEST BALANCES THE COMMISSION'S ROUTING CRITERIA?

8 A. Yes. First, as I stated above, the Preferred Route is comparable to the Blue
9 Route and compares favorably to the other full route options when assessing
10 residential proximity. The Preferred Route also is comparable or compares
11 favorably when considering other factors, including stream crossings (102),
12 forested wetlands (16 acres in right-of-way), total wetlands (138 acres in right-
13 of-way), and wetland crossings greater than 1,000 feet (2). The Blue Route was
14 already the least impactful route across many resource categories, and the
15 inclusion of six route segment alternatives to create the Preferred Route
16 further reduces impacts to human and environmental resources. In addition,
17 **Schedule 2** to my Surrebuttal Testimony is an updated version of Schedule 2
18 of my Direct Testimony; the table has been updated to include the DEIS
19 naming conventions for each route segment alternative to allow for ease of
20 reference.
21
22
23
24

¹⁴ DEIS at 187.

IV. SAMPLE ROUTE PERMIT

Q. HAVE YOU REVIEWED THE SAMPLE ROUTE PERMIT FILED BY EERA AS APPENDIX F TO THE DEIS?

A. Yes. It appears that the Sample Route Permit is the Commission's most recent route permit template.

Q. ARE THERE CURRENTLY ANY SPECIAL CONDITIONS IN THE SAMPLE ROUTE PERMIT?

A. No. The Sample Route Permit does not currently include any proposed special conditions, nor does the DEIS explicitly recommend any specific special conditions. If special conditions are later identified, Xcel Energy will respond to such conditions at that time.

Q. IF SPECIAL CONDITIONS ARE ULTIMATELY INCLUDED IN THE FINAL ROUTE PERMIT, DOES XCEL ENERGY HAVE ANY REQUESTS REGARDING SUCH CONDITIONS?

A. Yes. If any special conditions are included in the Route Permit issued by the Commission, Xcel Energy respectfully requests the timing for compliance with those conditions is consistent. Specifically, in the Sample Route Permit, most required compliance filings must be submitted at least 14 days in advance of the pre-construction meeting. Xcel Energy requests that, if additional conditions are imposed, they would also be required to be filed at least 14 days in advance of the pre-construction meeting. Likewise, Xcel Energy requests that the timing of any required landowner notifications/mailings is generally consistent across permit conditions. For example, Section 5.3.1 requires a permittee to provide landowners with the field representative's contact

1 information at least 14 days prior to the pre-construction meeting. Ensuring
2 that these filings and mailings are generally subject to the same timeframes
3 reduces confusion among landowners and would also help the Project
4 proceed efficiently to construction, while nonetheless maintaining compliance
5 with all required conditions.

6
7 **V. CONCLUSION**
8

9 Q. DOES THIS CONCLUDE YOUR PRE-FILED SURREBUTTAL TESTIMONY?

10 A. Yes.

September 25, 2024

Matthew Langan
Xcel Energy
414 Nicollet Mall
Minneapolis MN 55401

RE: Minnesota Energy Connection Project
Construction of a High-Voltage Transmission Line from Sherco Station in Becker, Sherburne County to a New Substation near the Town of Garvin in Lyon County
Multiple Counties
SHPO Number: 2023-3066

Dear Matthew Langan:

Thank you for continuing consultation on the above referenced project. Information received on July 23, 2024 has been reviewed pursuant to the responsibilities given the State Historic Preservation Office by the Minnesota Historic Sites Act (Minn. Stat. 138.665-666) and the Minnesota Field Archaeology Act (Minn. Stat. 138.40).

As stated in the correspondence, Xcel Energy is proposing to construct a new double-circuit 345 kV high voltage transmission line from Becker in Sherburne County to a new substation that will be constructed in the vicinity of Garvin in Lyon County. We have reviewed the report, *Phase Ia Literature Review for the Minnesota Energy Connection Project, Chippewa, Kandiyohi, Lyon, Meeker, Redwood, Renville, Sherburne, Stearns, Wright, and Yellow Medicine Counties, Minnesota* (July 2024) and the Culture Resource Survey Plan (July 16, 2024) as prepared by Merjent and we agree that the proposed survey plan is appropriate. We look forward to reviewing the results of the Phase I survey when they become available.

As previously stated, the project should consider not only direct impacts to currently designated historic properties (properties listed in the National or State Registers of Historic Places, or within the Historic Sites Network) but also any potential indirect impacts as well. The analysis completed for what are commonly referred to as "indirect impacts" should take into account any introduction of visual, atmospheric, or audible elements that may have an effect on the designated historic properties. Indirect effects can also include changes to a historic property's use or access to a historic property.

Please note that this comment letter does not address the requirements of Section 106 of the National Historic Preservation Act of 1966 and 36 CFR § 800. If this project is considered for federal financial assistance, or requires a federal permit or license, then review and consultation with our office will need to be initiated by the lead federal agency. Be advised that comments and recommendations provided by our office for this state-level review may differ from findings and determinations made by the federal agency as part of review and consultation under Section 106.

We look forward to continuing consultation on this project. If you have any questions regarding our review of this project, please contact me at kelly.graggjohnson@state.mn.us or 651-201-3285.

Sincerely,

Kelly Gragg-Johnson

Kelly Gragg-Johnson
Environmental Review Program Specialist

MINNESOTA STATE HISTORIC PRESERVATION OFFICE

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**Langan Surrebuttal
Schedule 2**

ID	Type	Route Connection	Description	Proposer	Applicant Position	Applicant Summary Comments	DEIS Name
Blue Route	Route	NA	The Blue Route is 174 miles long and was proposed by the applicant. It crosses Sherburne, Stearns, Meeker, Kandiyohi, Renville, Redwood, and Lyon counties.	Applicant	N/A		
Purple Route	Route	NA	The Purple Route is 171 miles long and was proposed by the applicant. It crosses Sherburne, Wright, Stearns, Meeker, Kandiyohi, Chippewa, Renville, Yellow Medicine, and Lyon counties.	Applicant	N/A		
201	Route Segment	Blue	EERA received a scoping comment from Ronald McDaniel (#111) proposing Route Segment 201. This route segment initiates at the proposed Garvin Substation in Lyon County. It traverses north along U.S. Highway 59 until Country Road 2 where it turns east until it joins the Blue Route. The commenter noted potential impacts on habitat/wildlife/rare species, water resources, and land use.	Public	Oppose	Outstanding Site of Biological Significance (SOBS) would be impacted by this alternative, but not Applicant's Preferred Route. To avoid Outstanding SOBS, right-of-way would impact Garvin County Park (which implicates LAWCON and thus potential additional federal environmental review and permitting).	A5
202	Route Segment	Blue	EERA received scoping comments from Stephen Miller (#59) and Ronald McDaniel (#111) proposing Route Segment 202. This route segment departs the Blue Route at County Road 9 and traverses north. It turns east along the northern border of T110N, R40W, S29 until it rejoins the Blue Route. The commenters noted potential impacts on farming operations, habitat/wildlife/ rare species, water resources, and land use.	Public	Support	Applicant incorporated this route alternative into its Preferred Route for the reasons generally discussed in Section VI of this Direct Testimony.	A6, A7

*The text in the columns titled Name, Type, Route Connection, Description, and Proposer is taken verbatim from the corresponding columns in Appendix A of the Environmental Impact Statement Scoping Decision prepared by the Department of Commerce. Xcel Energy has directly reproduced that text for convenience in this table; the text's inclusion in this table does not reflect Xcel Energy's adoption or endorsement.

**Langan Surrebuttal
Schedule 2**

ID	Type	Route Connection	Description	Proposer	Applicant Position	Applicant Summary Comments	DEIS Name
203	Route Segment	Blue	EERA received a scoping comment from the Lyon County Commissioner (#443) proposing Route Segment 203. This route segment departs the Blue Route at County Road 9 and traverses north. It turns east at 185th Street, traverses north on 310th Avenue, continues east on 190th Street, then traverses north on 320th Avenue until it rejoins the Blue Route. The Commissioner noted potential impacts on farming operation, land use, and tree removal.	Lyon County Commissioner	Support 3.5-mile portion that follows County Road 9 (additional 3 miles do not follow this road).	Four fewer deadend structures. This alternative overlaps with Route 202, which Xcel Energy supports and has incorporated into the Preferred Route. Because Xcel Energy supports only a portion of this alternative, Xcel Energy has not incorporated it into the current Preferred Route.	A6, A7
204	Route Segment	Purple	EERA received a scoping comment from Eldan Mitzer (#257) proposing Route Segment 204. This route segment departs the Purple Route by traversing further west on U.S. Highway 14. Halfway into T109N, R41W, S16, it turns north until it rejoins the Purple Route. The commenter noted potential impacts on stray voltage, land use, and green/clean energy.	Public	Oppose	Right angle at US Highway 14 presents challenges with pipeline and 69 kilovolt (kV) line crossing. In contrast, Applicant's Purple Route follows a road. Also, not applicable to Applicant's Preferred Route. ¹	204
205	Route Segment	Purple	EERA received a scoping comment from Ken Marcotte (#32) proposing Route Segment 205. This route segment departs the Purple Route at 190th Street where it traverses east to U.S. Highway 59. From here it turns north until it rejoins the Purple Route. The commenter noted potential	Public	Oppose	Additional residential impacts along CR 59 - pinch points between houses. Two additional 115 kV line crossings.	A2

¹ Xcel Energy's Preferred Route consists of the Blue Route identified in the Route Permit Application, together with several route alternatives proposed during the scoping period. As such, route alternatives which modify the Purple Route are not applicable to the Company's current Preferred Route. Nonetheless, Xcel Energy provides analysis of those alternatives here, as applicable.

**Langan Surrebuttal
Schedule 2**

ID	Type	Route Connection	Description	Proposer	Applicant Position	Applicant Summary Comments	DEIS Name
			impacts on habitat/wildlife/rare species and water resources.				
206	Route Segment	Purple	EERA received a scoping comment from Ken Marcotte (#32) proposing Route Segment 206. This route segment departs the Purple Route at County Road 67 and traverses north to 220th Street. From here, it turns east until it rejoins the Purple Route. The commenter noted potential impacts on habitat/wildlife/rare species and water resources.	Public	Oppose	Additional residential impacts along County Road 67 and 220 th Street- pinch points between houses.	206
101	Route Connector	Connects Blue and Purple Routes	Route Connector 101 was proposed by the applicant as "Connector D." It is approximately 8 miles long and located in Lyon County.	Applicant	N/A		101, A4
207	Route Segment	(route segment starting and ending on Connector 101)	EERA received a scoping comment from Mike Truwe (#61) proposing Route Segment 207. This route segment departs the Blue Route and traverses north on the eastern border of T110N, R40W, S17 until it joins Route Connector 101. The commenter noted potential impacts on stray voltage, aesthetic impacts/property values, tree removal, and noise.	Public	No position	Would not be applicable unless Route Connector 101 was incorporated into the approved route.	207
208	Route Segment	(route segment starting and ending on Connector 101)	EERA received a scoping comment from Leslie Bergquist (#101) proposing Route Segment 208. This route segment departs Route Connector 101 at 230th Street and traverses west. It turns north at 310th Avenue until it rejoins Route Connector 101. The commenter noted potential impacts on farming operation, aesthetic	Public	Oppose	Due to offset from existing 115 kV line and ditch, following 310th does not mitigate agricultural impacts. Also, two additional angle structures and one additional residence as compared to Applicant's Route Connector 101.	208

**Langan Surrebuttal
Schedule 2**

ID	Type	Route Connection	Description	Proposer	Applicant Position	Applicant Summary Comments	DEIS Name
			impacts/property values, and use of existing ROW.				
209	Route Segment	Purple	EERA received a scoping comment from David Kietzmann and Saralee Kietzmann (#266) proposing Route Segment 209. This route segment departs the Purple Route at 490th Steet and traverses north. It turns east at 290th Avenue until it rejoins the Purple Route. The commenters noted potential impacts on farming operation and water resources.	Public	Oppose	Longer route and has additional residential impacts as compared to Purple Route. Also, not applicable to Applicant's Preferred Route.	B3
210	Route Segment	Purple	EERA received a scoping comment from Leslie Bergquist (#101) proposing Route Segment 210. This route segment departs the Purple Route continuing north on State Highway 23 following the curve of the highway until it rejoins the Purple Route. The commenter noted potential impacts on farming operation, aesthetic impacts/property values, and use of existing ROW.	Public	Oppose	Crosses cemetery; within Minnesota Department of Transportation (MnDOT) right-of-way. Also, not applicable to Applicant's Preferred Route.	210
102	Route Connector	Connects Blue and Purple Routes	EERA received a scoping comment from Daniel Wambeke and 43 others (#320) proposing Route Connector 102. This route connector departs the Blue Route at Lyon Redwood Road and traverses north. It turns east at 230th Street, continues north on Aspen Avenue, then continues east on 260th Street. From there, the route connector traverses north at County Highway 8, turns east halfway into T114N, R39W, S33, then continues north at County Road 6. It traverses west across the	Public	No position	Route alternative does not connect to Applicant's preferred route.	102, B2

**Langan Surrebuttal
Schedule 2**

ID	Type	Route Connection	Description	Proposer	Applicant Position	Applicant Summary Comments	DEIS Name
			lower portion if T114N, R39W, S28, turns north halfway into the section, then continues east halfway into T114, R39W, S21. The route connector traverses north at State Highway 274 following the curve of the highway, turns west halfway into T114N, R39W, S4, and continues north a third of the way into the section. It traverses west on 220th Ave, turns north at the western border of T115, R39W, S32, and continues west at 230th Avenue until it joins the Purple Route. The commenters noted potential impacts on public health/EMF/pacemaker, farming operation, stray voltage, aesthetic impacts/property values, habitat/wildlife/rare species, water resources, proximity to home/being boxed in, land use, and noise.				
211	Route Segment	Blue	EERA received a scoping comment from Ben Hicks (#289) proposing Route Segment 211. This route segment departs the Blue Route at County Road 8 and traverses south. It turns east at County Road 4 and continues north at Duncan Avenue until it rejoins the Blue Route. The commenter noted potential impacts on farming operation, habitat/wildlife/rare species, land use, and tree removal.	Public	Support – with the exception of the north/south portion along Duncan Road	Applicant prefers connection to Route 219 to rejoin Blue Route / Preferred Route rather than proceeding north along Duncan Road to minimize angle structures (2 fewer angle structures). This alternative overlaps with Route 219, which Xcel Energy supports and has incorporated into the Preferred Route. Because Xcel Energy supports only a portion of this alternative, Xcel Energy has not	211

**Langan Surrebuttal
Schedule 2**

ID	Type	Route Connection	Description	Proposer	Applicant Position	Applicant Summary Comments	DEIS Name
						incorporated it into the current Preferred Route.	
212	Route Segment	Blue	EERA received a scoping comment from Jeff Turbes (#102) proposing Route Segment 212. This route segment departs the Blue Route by continuing east on 240th Street. It turns north at County Highway 7 until it rejoins the Blue Route. The commenter noted potential impacts on farming operation, stray voltage, aesthetic impacts/property values, and use of existing ROW.	Public	Support	Applicant incorporated this route alternative into its Preferred Route for the reasons generally discussed in Section VI of this Direct Testimony.	212
213	Route Segment	Blue	EERA received a scoping comment from Jeff Potter (#22) proposing Route Segment 213. This route segment departs the Blue Route by continuing north on Ideal Avenue. It turns east halfway into T112N, R37W, S14, and continues south at Kenwood Avenue until it rejoins the Blue Route. The commenter noted potential impacts on electronic interference, farming operation, stray voltage, aesthetic impacts/property values, and noise.	Public	Oppose	Route alternative is adjacent to Minnesota Department of Natural Resources (MDNR) Wildlife Management Area (WMA) and would require greenfield crossing of Redwood River, whereas Preferred Route crosses along a road.	213
214	Route Segment	Blue	EERA received a scoping comment from Cletus Gewerth (#30) proposing Route Segment 214. This route segment departs the Blue Route at Porter Avenue and traverses north. It turns east at 320th Street until it rejoins the Blue Route. The commenter noted potential impacts on water resources and wildlife.	Public	Oppose	Route alternative would require installation of transmission structures and foundations within a Board of Water and Soil Resources (BWSR) easement that restricts construction of structures. Thus, the affected portion of this alternative would likely require partial termination/alteration of the	214

**Langan Surrebuttal
Schedule 2**

ID	Type	Route Connection	Description	Proposer	Applicant Position	Applicant Summary Comments	DEIS Name
						BWSR easement through a process involving BWSR, the landowner, Applicant, and consultation with the Commissioners of the Departments of Agriculture and Natural Resources. Other route alternatives exist in this area which instead span over narrower sections of BWSR easement areas.	
215	Route Segment	Blue	EERA received a scoping comment from Andrew Rieke and Linda Rieke (#270) proposing Route Segment 215. This route segment departs the Blue Route at Highway 19 and traverses east. It turns north halfway into T112, R34W, S2 until it rejoins the Blue Route. The commenters noted potential impacts on farming operation.	Public	Oppose	Additional crossings of 69 kV line with BWSR easements on either side of the road. Also encroaches on the incorporated areas of the City of Franklin.	215
216	Route Segment	Blue	EERA received a scoping comment from Connie Kieper (#84) proposing Route Segment 216. This route segment departs the Blue Route halfway into T115N, R34W, S25 traverses east. It turns north at the eastern border of T115, R33W, S30 until it rejoins the Blue Route. The commenter noted potential impacts on public health/EMF/pacemaker, electronic interference, farming operation, noise, and use of existing ROW.	Public	Support	Applicant incorporated this route alternative into its Preferred Route for the reasons generally discussed in Section VI of this Direct Testimony.	216
217	Route Segment	Blue	EERA received a scoping comment from Larry Posl (#209) proposing Route Segment 217. This route	Public	Oppose	Two additional angle structures and length of route (1.8 miles longer).	217

**Langan Surrebuttal
Schedule 2**

ID	Type	Route Connection	Description	Proposer	Applicant Position	Applicant Summary Comments	DEIS Name
			segment departs the Blue Route near the top of the eastern border of T115N, R33W, S6 and traverses northwest. It turns west at County Road 70, continues north at County Road 57, then continues east at the northern border of T116N, R33W, S31 until it rejoins the Blue Route. The commenter noted potential impacts on farming operation and proximity to home/being boxed in.				
218	Route Segment	Blue	EERA received a scoping comment from Larry Posl (#209) proposing Route Segment 218. This route segment departs the Blue Route near the top of the eastern border of T115N, R33W, S6 and traverses northwest. It turns west at County Road 70, continues north at County Road 57, then continues east at the northern border of T116N, R33W, S30 until it rejoins the Blue Route. The commenter noted potential impacts on farming operation and proximity to home/being boxed in.	Public	Oppose	Two additional angle structures and length of route.	218
219	Route Segment	Blue	EERA received a scoping comment from Ben Hicks (#289) proposing Route Segment 219. This route segment departs the Blue Route at County Road 8 and traverses south. It turns east at County Road 4, and continues north halfway into T110N, R38W, S17 until it rejoins the Blue Route. The commenter noted potential impacts on farming operation,	Public	Support	Applicant incorporated this route alternative into its Preferred Route for the reasons generally discussed in Section VI of this Direct Testimony.	219

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ID	Type	Route Connection	Description	Proposer	Applicant Position	Applicant Summary Comments	DEIS Name
			habitat/wildlife/rare species, land use, and tree removal.				
220	Route Segment	Blue	EERA received a scoping comment from Brian Greenslit and Gloria Greenslit (#3) proposing Route Segment 220. This route segment departs the Blue Route at State Highway 19 and traverses east. It turns north halfway into T112, R34W, S3 until it rejoins the Blue Route. The commenters noted potential impacts on aesthetic impacts/property values, proximity to home/being boxed in, and noise.	Public	No position	Requires two additional angle structures, with no appreciable corresponding reduction in human and environmental impacts.	220
221	Route Segment	Purple	EERA received a scoping comment from David Kietzmann and Saralee Kietzmann (#266) proposing Route Segment 221. This route segment departs the Purple Route at 260th Avenue and traverses west. It turns north at 520th Street, continues east at State Highway 67, and continues north a quarter of the way into T116N, R39W, S31. It turns east a quarter of the way into the section until it rejoins the Purple Route. The commenters noted potential impacts on farming operation and water resources.	Public	Oppose	Six additional angle structures and increased impact to residences. Also, not applicable to Applicant's Preferred Route.	221
103	Route Connector	Connects Blue and Purple Routes	EERA received a scoping comment from Melvin Zuidem (#35) proposing Route Connector 103. This route connector departs the Purple Route continuing east on County Highway 18 until it joins the Blue Route. The commenter noted potential impacts on	Public	No position	Route alternative does not connect to Applicant's Preferred Route.	103, C2

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ID	Type	Route Connection	Description	Proposer	Applicant Position	Applicant Summary Comments	DEIS Name
			farming operation and development/community.				
222	Route Segment	Blue	EERA received a scoping comment from Luke Johnson (#306) proposing Route Segment 222. This route segment departs the Blue Route at 195th Avenue SE and traverses north. It turns east at County Road 77 until it rejoins the Blue Route. The commenter noted potential impacts on farming operation.	Public	Oppose	Increased impacts to residences and two additional angle structures.	222
223	Route Segment	Blue	EERA received a scoping comment from Duane Anderson (#200) proposing Route Segment 223. This route segment departs the Blue Route continuing east on 100th Street. It turns north at 515th Avenue until it rejoins the Blue Route. The commenter noted potential impacts on land use.	Public	See Section V of Direct Testimony.	See Section V of Direct Testimony.	223
104	Route Connector	Connects Blue and Purple Routes	Route Connector 104 was proposed by the applicant as "Connector C." It is approximately 29 miles long and located in Kandiyohi and Chippewa counties.	Applicant	N/A		104, C3
224	Route Segment	Purple	EERA received a scoping comment from Marilyn Worke and Helga Miller (#256) proposing Route Segment 224. This route segment departs the Purple Route at 30th Avenue SE and traverses east. It turns north halfway into T119N, R33W, S19 until it rejoins the Purple Route. The commenters noted potential impacts on farming operation.	Public	No position	Not applicable to Applicant's Preferred Route.	224
225	Route Segment	Purple	EERA received a scoping comment from Jordan Junkermeier and Rachel Junkermeier (#130) proposing Route	Public	Oppose	Increased impacts to residences. Also, not	225

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ID	Type	Route Connection	Description	Proposer	Applicant Position	Applicant Summary Comments	DEIS Name
			Segment 225. This route segment departs the Purple Route continuing north halfway into T119N, R33W, S6. It turns east at 30th Avenue NE until it rejoins the Purple Route. The commenters noted potential impacts on public health/EMF/pacemaker, aesthetic impacts/property values, habitat/wildlife/rare species, water resources, proximity to home/being boxed in, tree removal, and green/clean energy.			applicable to Applicant's Preferred Route.	
105	Route Connector	Connects Blue and Purple Routes	Route Connector 105 was proposed by the applicant as "Connector B." It is approximately 1 mile long and located in Meeker County.	Applicant	N/A		105
106	Route Connector	Connects Blue and Purple Routes	Route Connector 106 was proposed by the applicant as "Connector A." It is approximately 1.5 miles long and located in Meeker County.	Applicant	N/A		106, D3, D7
107	Route Connector	Connects Blue and Purple Routes	EERA received a scoping comment from Maureen Murray (#45) proposing Route Connector 107. This route connector departs the Purple Route continuing east halfway through T121N, R31W, S27 until it connects to the Blue Route. The commenter noted potential impacts on public health/EMF/pacemaker, electronic interference, aesthetic impacts/property values, habitat/wildlife/rare species, water resources, land use, conservation easement, and bees/pollinator habitat.	Public	No position	Not applicable to Applicant's Preferred Route.	107
226	Route Segment	Blue	EERA received a scoping comment from Von Grotto (#246) proposing Route Segment 226. This route	Public	Support	Applicant incorporated this route alternative into its Preferred Route for the	D5

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ID	Type	Route Connection	Description	Proposer	Applicant Position	Applicant Summary Comments	DEIS Name
			segment departs the Blue Route at the southwestern corner of T120N, R31W, S9 and traverses northeast. It turns east a quarter of the way through the section, continues north at 600th Avenue, and continues east at the northern border of T120N, R31W, S3 until it rejoins the Blue Route. The commenter noted potential impacts on farming operation and proximity to home/being boxed in.			reasons generally discussed in Section VI of this Direct Testimony. Specifically, this alternative presents a better crossing of the existing 400kV transmission line in this area. This option also parallels more road right-of-way than the Applicant's Blue Route, reduces the impact on agricultural lands and reduces the number of residences within 500 feet of the transmission line.	
227	Route Segment	Blue	EERA received a scoping comment from Gordon Neuman and Ramona Neuman (#46) proposing Route Segment 227. This route segment departs the Blue Route continuing east on County Road 7. It turns north at State Highway 22 and follows the curve of the highway until it rejoins the Blue Route. The commenters noted potential impacts on farming operation, habitat/wildlife/rare species, and conservation easement.	Public	No position		D6
228	Route Segment	Purple	EERA received a scoping comment from Gordon Neuman and Ramona Neuman (#46) proposing Route Segment 228. This route segment departs the Purple Route at State Highway 4 and traverses north. It turns east at County Road 16 until it rejoins the Purple Route. The commenters noted potential impacts on farming	Public	No position	Not applicable to Applicant's Preferred Route.	D2

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ID	Type	Route Connection	Description	Proposer	Applicant Position	Applicant Summary Comments	DEIS Name
			operation, habitat/wildlife/rare species, and conservation easement.				
229	Route Segment	Purple	EERA received a scoping comment from Dawn Jansen (#62) proposing Route Segment 229. This route segment departs the Purple Route at 590th Avenue and traverses north. It turns east at 349th Street until it rejoins the Purple Route. The commenter noted potential impacts on public health/EMF/pacemaker, aesthetic impacts/property values, proximity to home/being boxed in, and tree removal.	Public	No position	Not applicable to Applicant's Preferred Route.	229
230	Route Segment	Purple	EERA received a scoping comment from LuVern Becker (#132) proposing Route Segment 230. This route segment departs the Purple Route halfway into T121N, R31W, S10 and traverses north. It turns east at County Road 36 until it rejoins the Purple Route. The commenter noted potential impacts on farming operation, aesthetic impacts/property values, and habitat/wildlife/rare species.	Public	Oppose	This route alternative parallels a pipeline, which could require additional studies and mitigation. Also, not applicable to Applicant's Preferred Route.	230
231	Route Segment	Purple	EERA received a scoping comment from Brad Libbesmeier and Ellen Libbesmeier (#79) proposing Route Segment 231. This route segment departs the Purple Route at 140th Street and traverses east. It turns north at County Highway 149 until it rejoins the Purple Route. The commenters noted potential impacts on public health/EMF/pacemaker, farming operation, aesthetic impacts/property	Public	Oppose	Increased impact to residences. Also, not applicable to Applicant's Preferred Route.	231

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ID	Type	Route Connection	Description	Proposer	Applicant Position	Applicant Summary Comments	DEIS Name
			values, use of existing ROW, and green/clean energy.				
232	Route Segment	Purple	EERA received a scoping comment from Ben Stockinger (#143) proposing Route Segment 232. This route segment departs the Purple Route three quarters through T122N, R29W, S32 and traverses east. It continues east at Balsam Road and follows the curve of the road until it rejoins the Purple Route. The commenter noted potential impacts on farming operation and aesthetic impacts/property values.	Public	No position	Not applicable to Applicant's Preferred Route.	232
108	Route Connector	Connects Blue and Purple Routes	EERA received a scoping comment from John Stein (#27) proposing Route Connector 108. This route connector departs the Purple Route a quarter through T122N, R29W, S34 and traverse south until it connects to the Blue Route. The commenter noted potential impacts on habitat/wildlife/rare species, water resources, and farming operations.	Public	No position	Not applicable to Applicant's Preferred Route.	108
109	Route Connector	Connects Blue and Purple Routes	EERA received a scoping comment from the MN DNR (#285) proposing Route Connector 109. This route connector departs the Purple Route at the western border of T122N, R29W, S35 and traverses south. It turns east a quarter of the way through the section, continues north a little over halfway through the section, then continues east two thirds through the section to connect to the Blue Route. The DNR noted potential impacts on	DNR	Oppose	Route alternative crosses an active gravel pit, and has potentially six additional angle structures as compared to the Applicant's Preferred Route. Also, not applicable to Applicant's Preferred Route.	109, F3, F6, F8

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ID	Type	Route Connection	Description	Proposer	Applicant Position	Applicant Summary Comments	DEIS Name
			habitat/wildlife/rare species, water resources, and tree removal.				
110	Route Connector	Connects Blue and Purple Routes	EERA received a scoping comment from John Adolph and Tamile Adolph (#81) proposing Route Connector 110. This route connector departs the Purple Route at Power Rodge Road and traverses east until it connects to the Blue Route. The commenters noted potential impacts on farming operation.	Public	Oppose	Increased impacts to residences and clearing of forested wetlands. Also, not applicable to Applicant's Preferred Route.	110, F2, F7
233	Route Segment	Blue	EERA received a scoping comment from the MN DNR (#285) proposing Route Segment 233. This route segment departs the Blue Route at State Highway 15 traversing north following the curve of the highway. It turns east a quarter of the way into T122N, R29W, S35, continues north halfway into the section, then continues east two thirds of the way through the section until it rejoins the Blue Route. The DNR noted potential impacts on habitat/wildlife/rare species, water resources, and tree removal.	DNR	Oppose	Route alternative crosses an active gravel pit, has four additional angle structures, increased agricultural impacts, and does not follow property lines.	109, F3, F6, F8
234	Route Segment	Blue	EERA received a scoping comment from Joel Lauer (#222) proposing Route Segment 234. This route segment departs the Blue Route at State Highway 15 following the curve of the road. It turns east at County Road 146 until it rejoins the Blue Route. The commenter noted potential impacts on farming operation.	Public	Oppose	Increased impact to residences and general lack of available right-of-way. MDNR early coordination review indicated concern for routing along State Highway 15.	F5, F7, F8, G2
235	Route Segment	Blue	EERA received a scoping comment from Dan Stein (#214) proposing Route Segment 235. This route	Public	Oppose	Concern regarding increased impact to center pivot irrigation and proximity to	235

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ID	Type	Route Connection	Description	Proposer	Applicant Position	Applicant Summary Comments	DEIS Name
			segment departs the Blue Route continuing north at the western border of T122N, R29W, S25. It turns east three quarters through the section, then continues north a quarter through the section. From there, it turns east a quarter through T122N, R29W, S24 until it rejoins the Blue Route. The commenter noted potential impacts on public health/EMF/pacemaker, aesthetic impacts/property values, habitat/wildlife/rare species, water resources, and use of existing ROW.			Stearns County Waterfowl Production Area.	
236	Route Segment	Blue	EERA received a scoping comment from Jason Pierskalla (#56) proposing Route Segment 236. This route segment departs the Blue Route at 73rd Avenue and traverses north. It turns east at 163rd Street until it rejoins the Blue Route. The commenter noted potential impacts on public health/EMF/pacemaker, habitat/wildlife/rare species, general environmental impact, and conservation easement.	Public	Oppose	Concern regarding increased impact to center pivot irrigation.	236
237	Route Segment	Blue	EERA received a scoping comment from Jason Pierskalla (#56) proposing Route Segment 237. This route segment departs the Blue Route at 73rd Avenue and traverses north. It turns east halfway into T122N, R28W, S19 until it rejoins the Blue Route. The commenter noted potential impacts on public health/EMF/pacemaker, habitat/wildlife/rare species, general	Public	Oppose	Concern regarding increased impact to center pivot irrigation	237

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ID	Type	Route Connection	Description	Proposer	Applicant Position	Applicant Summary Comments	DEIS Name
			environmental impact, and conservation easement.				
238	Route Segment	Blue	EERA received a scoping comment from Jason Pierskalla (#49) proposing Route Segment 238. This route segment departs the Blue Route at 73rd Avenue and traverses north. It turns east at 152nd Street until it rejoins the Blue Route. The commenter noted potential impacts on public health/EMF/pacemaker, farming operation, aesthetic impacts/property values, habitat/wildlife/rare species, general environmental impact, conservation easement, tree removal, and bees/pollinator habitat.	Public	Oppose	Increased impact to residences and lack of available right-of-way due to residences on both sides of the road.	238
239	Route Segment	Blue	EERA received a scoping comment from Jason Pierskalla (#162) proposing Route Segment 239. This route segment departs the Blue Route a quarter of the way through T122N, R28W, S30 and traverses north. It turns east at 152nd Street until it rejoins the Blue Route. The commenter noted potential impacts on public health/EMF/pacemaker, aesthetic impacts/property values, habitat/wildlife/rare species, general environmental impact, and conservation easement.	Public	No position		239
240	Route Segment	Blue	EERA received a scoping comment from Jason Pierskalla (#162) proposing Route Segment 240. This route segment departs the Blue Route a quarter of the way into T122N, R28W, S30 and traverses north. It turns east	Public	Oppose	Concern regarding increased impact to center pivot irrigation	240

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ID	Type	Route Connection	Description	Proposer	Applicant Position	Applicant Summary Comments	DEIS Name
			three quarters through the section until it rejoins the Blue Route. The commenter noted potential impacts on public health/EMF/pacemaker, aesthetic impacts/property values, habitat/wildlife/rare species, general environmental impact, and conservation easement.				
241	Route Segment	Purple	EERA received a scoping comment from the MN DNR (#285) proposing Route Segment 241. This route segment departs the Purple Route at 73rd Avenue and traverses south. It turns east at 140th Street and follows the curve of the street. From there, it turns north at 53rd Avenue until it rejoins the Purple Route. The DNR noted potential impacts on habitat/wildlife/rare species, water resources, and tree removal.	DNR	Oppose	Increase route length and eight additional angle structures. Also, not applicable to Applicant's Preferred Route.	G5
242	Route Segment	Purple	EERA received a scoping comment from Joe Lauer (#197) proposing Route Segment 242. This route segment departs the Purple Route at County Highway 7 and traverses south. It turns northeast at County Highway 45 until it rejoins the Purple Route. The commenter noted potential impacts on electronic interference, farming operation, habitat/wildlife/rare species, and land use.	Public	Oppose	Increased residential impact and route length. Also, not applicable to Applicant's Preferred Route.	242
243	Route Segment	Purple	EERA received a scoping comment from Raechell Nelson (#302) proposing Route Segment 243. This route segment departs the Purple Route three quarters of the way through T122N,	Public	No position	Not applicable to Applicant's Preferred Route.	243

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ID	Type	Route Connection	Description	Proposer	Applicant Position	Applicant Summary Comments	DEIS Name
			R28W, S26 and traverses east. It turns north at 13th Avenue until it rejoins the Purple Route. The commenter noted potential impacts on proximity to home/being boxed in.				
111	Route Connector	Connects Blue and Purple Routes	EERA received a scoping comment from Jack Miller (#178) proposing Route Connector 111. This route connector departs the Blue Route continuing east at the southern border of T122N, R28W, S30. It turns south at County Highway 7 until it connects to the Purple Route. The commenter noted potential impacts on public health/EMF/pacemaker, farming operations, stray voltage, noise, and use of existing ROW.	Public	No position	Not applicable to Applicant's Preferred Route.	111, G6
112	Route Connector	Connects Blue and Purple Routes	EERA received a scoping comment from the MN DNR (#285) proposing Route Connector 112. This route connector departs the Blue Route at Dellwood Road and traverses east following the curve of the road. It turns south at County Road 7, continues east at 170th Street, and continues south at 33rd Avenue. From there, it turns east at 165th Street, then continues south at 23rd Avenue until it connects to the Purple Route. The DNR noted potential impacts on habitat/wildlife/rare species, water resources, and tree removal.	DNR	Oppose	Increase impacts to residences and lack of available right-of-way due to residences on both sides of the road. Also, not applicable to Applicant's Preferred Route.	115, 249, 250, G4
113	Route Connector	Connects Blue and Purple Routes	EERA received a scoping comment from the MN DNR (#285) proposing Route Connector 113. This route connector departs the Blue Route at	DNR	Oppose	Concern regarding increased impact to agricultural lands that use center pivot irrigation. Increase impacts to	115, 249, 250_Eq, G4

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ID	Type	Route Connection	Description	Proposer	Applicant Position	Applicant Summary Comments	DEIS Name
			Dellwood Road and traverses east following the curve of the road. It turns south at County Road 7, continues east at 170th Street, and continues south at 33rd Avenue. From there, it turns east three quarters through T122N, R28W, S23. It turns southeast three quarters of the way through the section until it connects to the Purple Route. The DNR noted potential impacts on habitat/wildlife/rare species, water resources, and tree removal.			residences and lack of available right-of-way due to residences on both sides of the road. Also, not applicable to Applicant's Preferred Route.	
114	Route Connector	Connects Blue and Purple Routes	EERA received a scoping comment from the MN DNR (#285) proposing Route Connector 114. This route connector departs the Blue Route a quarter of the way through T122N, R28W, S20 and traverses east. It turns northeast a quarter of the way through the section, continues north a third of the way through the section, turns east three quarters of the way through the section, and continues northeast two thirds of the way through the section. From there, the route connector traverses north just above the southern border of T122N, R28W, S16, turns east at Dellwood Road following the curve of the road, and continues south at County Road 7. It turns east at 170th Street, continues south at 33rd Avenue, continues east at 165th Street, then turns south at 23rd Avenue until it connects to the Purple Route. The DNR noted potential impacts on	DNR	Oppose	Concern regarding increased impact to agricultural lands that use center pivot irrigation. Also, not applicable to Applicant's Preferred Route.	115, 249_Eq, 250, G4

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ID	Type	Route Connection	Description	Proposer	Applicant Position	Applicant Summary Comments	DEIS Name
			habitat/wildlife/rare species, water resources, and tree removal.				
115	Route Connector	Connects Blue and Purple Routes	EERA received a scoping comment from the MN DNR (#285) proposing Route Connector 115. This route connector departs the Blue Route a quarter of the way through T122N, R28W, S20 and traverses east. It turns northeast a quarter of the way through the section, continues north a third of the way through the section, turns east three quarters of the way through the section, and continues northeast two thirds of the way through the section. From there, the route connector traverses north just above the southern border of T122N, R28W, S16, turns east at Dellwood Road following the curve of the road, and continues south at County Road 7. It turns east at 170th Street, continues south at 33rd Avenue, and continues east three quarters through T122N, R28W, S23. It turns southeast three quarters of the way through the section until it connects to the Purple Route. The DNR noted potential impacts on habitat/wildlife/rare species, water resources, and tree removal.	DNR	Oppose	Concern regarding increased impact to agricultural lands that use center pivot irrigation. Also, not applicable to Applicant's Preferred Route.	115, 249_Eq, 250_Eq, G4
244	Route Segment	Blue	EERA received a scoping comment from the MN DNR (#285) proposing Route Segment 244. This route segment departs the Blue Route at the southern border of T123N, R28W, S32 and traverses east. It turns north at almost halfway through T123N, R28W,	DNR	Support	Applicant incorporated this route alternative into its Preferred Route for the reasons generally discussed in Section VI of this Direct Testimony.	244

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ID	Type	Route Connection	Description	Proposer	Applicant Position	Applicant Summary Comments	DEIS Name
			S33, continues northeast three quarters through the section, continues north at two thirds through the section, and turns northeast at County Road 142 until it rejoins the Blue Route. The DNR noted potential impacts on habitat/wildlife/rare species, water resources, and tree removal.				
245	Route Segment	Blue	EERA received a scoping comment from Miguel Cabrera and Shannon Cabrera (#167) proposing Route Segment 245. This route segment departs the Blue Route at Franklin Road and traverses north. It turns east at the southern border of T34N, R30W, S5, continues northeast at the southwest corner of T34N, R30W, S4, and continues southeast at County Road 8 SE until it rejoins the Blue Route. The commenters noted potential impacts on public health/EMF/pacemaker, aesthetic impacts/property values, habitat/wildlife/rare species, and water resources.	Public	Oppose	Increased route length and residential impact along River Road. Also, in close proximity to Island View Regional Park.	245
246	Route Segment	Blue	EERA received a scoping comment from Miguel Cabrera and Shannon Cabrera (#167) proposing Route Segment 246. This route segment departs the Blue Route at Franklin Road and traverses north following the curve of the road. It continues north about 1,200 feet at the western border of T123N, R27W, S8 then continues northeast. It turns east at the halfway parallel of T35N, R30W, S32, then	Public	Oppose	Increased route length and residential impact with lack of available right-of-way along River Road. <i>See</i> Section V of Direct Testimony for additional discussion.	246

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ID	Type	Route Connection	Description	Proposer	Applicant Position	Applicant Summary Comments	DEIS Name
			continues southeast at River Road SE following the curve of the road until it rejoins the Blue Line. The commenters noted potential impacts on public health/EMF/pacemaker, aesthetic impacts/property values, habitat/wildlife/rare species, and water resources.				
247	Route Segment	Purple	EERA received a scoping comment from the MN DNR (#285) proposing Route Segment 247. This route segment departs the Purple Route halfway up the eastern border of T122N, R27W, S17 and traverses east about 1,000 feet. From there, it turns north until it reaches County Road 46, and continues east on County Road 46 until it rejoins the Purple Route. The DNR noted potential impacts on habitat/wildlife/rare species, water resources, and tree removal.	DNR	No position	Not applicable to Applicant's Preferred Route.	247
AA1	Alternative Alignment	Blue	EERA received a scoping comment from Tom Haak (#6) proposing Alternative Alignment 1. He recommended the alternative alignment to avoid RIM easements on his property.	Public	No position		AA1
AA2	Alternative Alignment	(Neither) Route Connector 104	EERA received a scoping comment from Dennis Neimeyer (#258) proposing Alternative Alignment 2. He recommended the alternative alignment because it is more direct (less distance) and better avoids tree cover on his property which he notes is used for shelterbelt and CRP.	Public	No position	Not applicable to Applicant's Preferred Route.	AA2

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ID	Type	Route Connection	Description	Proposer	Applicant Position	Applicant Summary Comments	DEIS Name
AA3	Alternative Alignment	Purple	EERA received a scoping comment from Greg Potthoff (#82) proposing Alternative Alignment 3. He recommended the alternative alignment to minimize disruption to farming activities.	Public	No position	Not applicable to Applicant's Preferred Route.	AA3
AA4	Alternative Alignment	Purple	EERA received a scoping comment from John Welckle (#34) proposing Alternative Alignment 4. He recommended the alternative alignment to minimize farming activities. He specifically noted the alternative alignment would minimize impediment to large machinery maneuvering to accomplish modern farming.	Public	Oppose	Not a constructible crossing of the existing 345 kV line. Not applicable to Applicant's Preferred Route.	AA4