



414 Nicollet Mall
Minneapolis, MN 55401

December 23, 2025

VIA ELECTRONIC FILING

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

Re: **ROUTE PERMIT AMENDMENT – REPLY COMMENTS
MINNESOTA ENERGY CONNECTION PROJECT
MPUC DOCKET NO. E-022/TL-22-132**

Dear Ms. Bergman:

Northern States Power Company, doing business as Xcel Energy, respectfully submits these Reply Comments in response to the Notice of Comment Period on Route Permit Amendment Application issued by the Minnesota Public Utilities Commission on December 4, 2025.

On November 24, 2025, Xcel Energy submitted a Route Permit Amendment (Amendment Request) seeking to revise a portion of the route for the Minnesota Energy Connection Project (Project) in Redwood County, Minnesota (Proposed Amended Route). Xcel Energy stated that it sought the Proposed Amended Route as a result of ongoing landowner coordination and because it would reduce tree clearing and avoid a series of drainage ditches to accommodate the landowner's plans to construct agricultural erosion control berms. The landowners crossed by the Proposed Amended Route have agreed to the modified route. As shown on the figure included in the Amendment Request, the Proposed Amended Route follows road right-of-way for the entirety of its length. The Permitted Route does not.

Before the close of the initial comment period, comments were submitted by Wyatt Johansen (Johansen Comments)¹ and Energy Infrastructure Permitting (EIP) Staff.

¹ See Comment by Wyatt Johansen (Dec. 3, 2025) (eDocket No. 202511-225306-01).

December 23, 2025

Page 2

(EIP Staff Comments).² In addition, Tom Hook submitted comments dated December 19, 2025 (Hook Comments).³ Xcel Energy responds to each, in turn, below.

Johansen Comments

The Johansen Comments express opposition to the Proposed Amended Route because of concerns about residential proximity and driveway crossings, primarily apparently related to magnetic fields. The Commission evaluated magnetic fields in this docket, concluding that “[n]o impacts to human health due to EMF are anticipated as a result of the Project. . . .”⁴ The maps enclosed as **Attachment A** highlight the parcel at issue in the Johansen Comments and identify the distance of the residence from the Proposed Amended Route (approximately 975 feet). Xcel Energy continues to support the Proposed Amended Route because no health impacts are anticipated as a result of the Project, the landowners crossed by the route support its adoption and because the Proposed Amended Route presents reduced environmental impacts and facilitates efficient construction, as described in the Amendment Request.

EIP Staff Comments

EIP Staff Comments evaluate the Proposed Amended Route in three primary categories: human settlement; public health; and environmental impacts.

With respect to human settlement, EIP Staff Comments assert that the Proposed Amended Route would result in new aesthetic and property value impacts for three residences.⁵ Xcel Energy acknowledges that the Proposed Amended Route would place the Project in closer to proximity than the permitted route would to three

² See EIP Comments and Recommendations on Route Permit Amendment (Dec. 18, 2025) (eDocket No. 202512-226010-01) (hereinafter referred to as EIP Staff Comments).

³ Tom Hook Comments (Dec. 19, 2025) eDocket No. 202512-226081-01.

⁴ See Findings of Fact, Conclusions of Law and Recommendations at ¶ 473 (Feb. 5, 2025) (eDocket No. 20252-214994-01), adopted by the Commission in its Order Modifying and Adopting Administrative Law Judge Report, Granting Certificate of Need, and Issuing Route Permit for the Minnesota Energy Connection Project (June 11, 2025) (eDocket No. 20256-219826-01).

⁵ See EIP Staff Comments at 3.

residences, but does not agree that the record supports a conclusion that this would result in aesthetic and property value impacts. The residences are 700, 800, and 900⁶ feet from the alignment of the Proposed Amended Route, which limits aesthetic impacts. With respect to property values, Staff argues that because it evaluated an ROI for property value impacts of 1,600 feet, a distance of less than 1,600 feet to a residence will result in property value impacts. This conclusion is not supported by the EIS, which provides: “Research does not support a clear cause-and-effect relationship between property values and proximity to transmission lines, but has revealed trends that are generally applicable to properties near transmission lines...”⁷ (not defining “near”). There is no evidence in the record to indicate that a line 700-1000 feet away would have property value impacts any more than one 1,600 feet away.

Further, with respect to the three residences discussed in EIP Staff Comments, one residence (700 feet) is owned by landowners who are crossed by and support the Proposed Amended Route. Xcel Energy has coordinated with the owner of the second residence (800 feet), who informed Xcel Energy that they do not oppose the Proposed Amended Route. The third residence is the subject of the Johansen Comments discussed above.

Concerning public health, EIP Staff Comments state that “[p]otential EMF impacts can be minimized by placing the line away from residences and adhering to electric field standards,” and further note that the Proposed Amended Route “would place the line nearer to residences and to the users of County Road 4.”⁸ These arguments are not supported by the record because magnetic field values from the transmission line will drop to 0.02 at 300 feet from the centerline.⁹ All residences would be farther away from the centerline than 300 feet. Thus, there is no difference in potential effects (if there were any) between the Permitted Route and the Proposed Amended Route.

⁶ Xcel Energy analysis indicates that this residence is approximately 975 feet from the alignment. The difference could be due to EIP Staff calculating from edge of right-of-way.

⁷ See Final Environmental Impact Statement (FEIS) at 104 (Jan. 22, 2025) (eDocket No. 20251-214220-01).

⁸ See EIP Comments at 4.

⁹ See FEIS at 121 and Table 5-7.

Finally, with respect to environmental resources, EIP Staff Comments conclude that the Proposed Amended Route would “slightly decrease impacts to environmental resources,” but notes that some of these issues “appear to be addressable by prudent structure placement.”¹⁰ Xcel Energy agrees that the Proposed Amended Route would decrease environmental impacts. Xcel Energy further reaffirms that it submitted the Proposed Amended Route for Commission review and approval as a result of feedback from affected landowners and the Proposed Amended Route is the result of substantial coordination among Xcel Energy and those landowners. The affected landowners raised the issues documented in the Amendment Request. The issue could not be addressed solely by structure placement adjustments due to required span lengths. The proposed solution addresses the concerns without affecting new landowners.

Hook Comments

The Hook Comments¹¹ largely discuss the same issues as the Johansen Comments and EIP Staff Comments, which are addressed previously in these Reply Comments. Mr. Hook also takes issues with the submittal of the Amendment Request itself. Xcel Energy agrees with Mr. Hook’s statement that the permitted route was “properly vetted through research and open public input.” That said, both statute and the Route Permit¹² contemplate that a permittee may seek a route permit amendment, and the Commission has historically encouraged permittees to work with affected landowners even after a permit is issued on the issues subject to the Amendment Request here.

We appreciate the Commission’s consideration of these comments. We have electronically filed this document with the Minnesota Public Utilities Commission. Copies are also being served on the persons on the attached service lists. Please contact me if you have any questions regarding this filing.

¹⁰ See EIP Staff Comments at 5.

¹¹ Xcel Energy understands that Mr. Hook is Mr. Johansen’s father-in-law. Mr. Hook’s property is not crossed by the Proposed Amended Route.

¹² Minn. Stat. § 216I.09; Route Permit § 10.

December 23, 2025

Page 5

Sincerely,

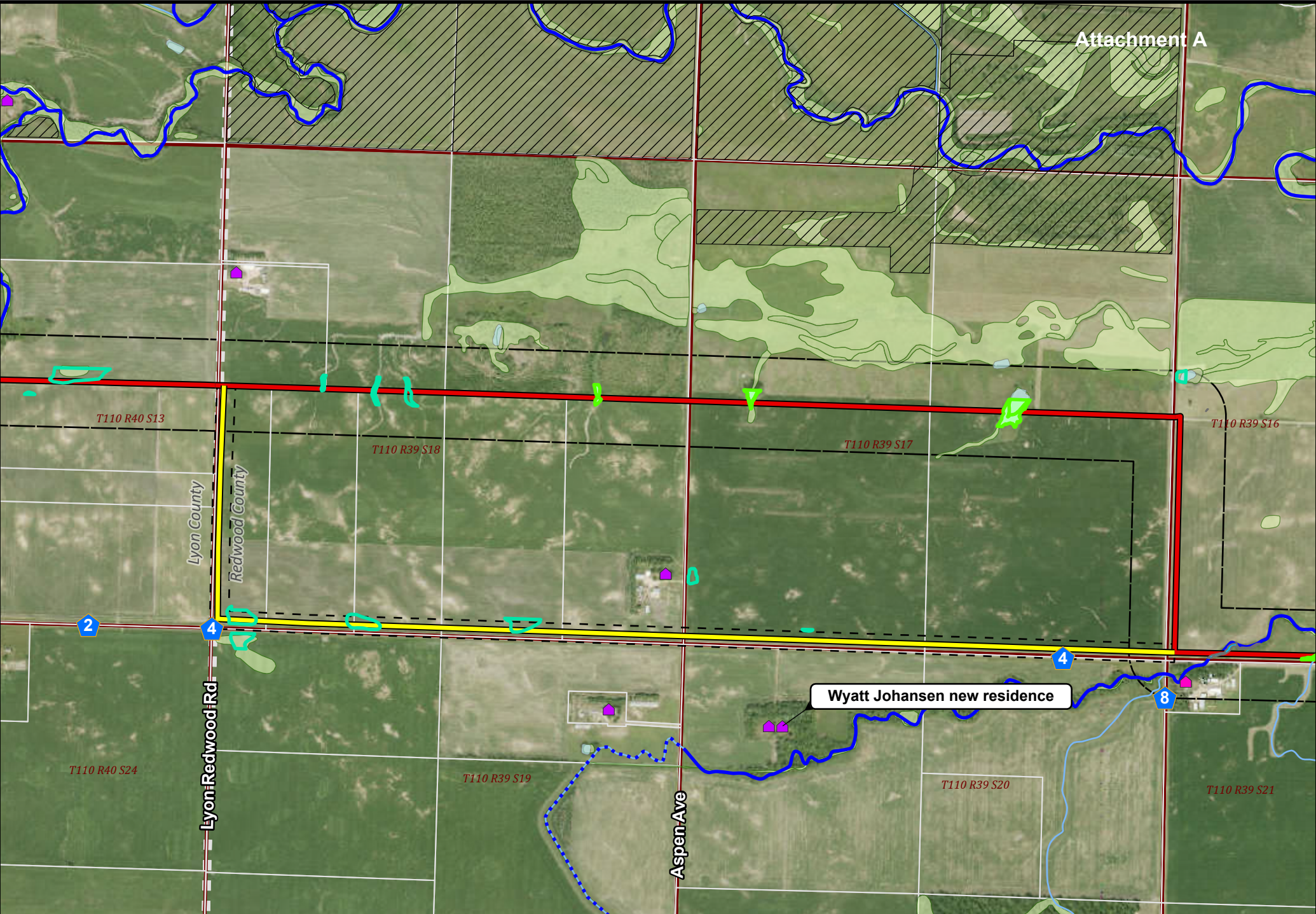
/s/

ANDREW WELCH

SENIOR SITING AND LAND RIGHTS AGENT

Enclosure

C: Service Lists



Minnesota Energy Connection County Road 4 Route Option



DISCLAIMER: This information is believed to be correct but is subject to change and is not warranted.

- | | | | | |
|---|--|---|---|---|
| <p> Residence within 500'</p> <p> Residence > 500'</p> | <p> PUC Approved Route</p> <p> Designated Route Width</p> <p> Proposed Amended Route</p> <p> 200' Corridor</p> | <p> BWSR Conservation Easement</p> <p> Desktop Determined Wetland</p> <p> Field Surveyed Wetland</p> <p> Public Water Watercourse</p> | <p> Public Ditch/Altered Natural Watercourse</p> <p> Waterway (NHD)</p> <p> Lake/Pond (NHD)</p> | <p> Wetlands (NWI)</p> <p> Parcels</p> <p> Section Line</p> |
|---|--|---|---|---|
- 0 0.1 0.2 Miles
- N



Google Earth image from 10/24/2024 showing new construction

Old residence

New residence location, 975' from proposed amended route

Minnesota Energy Connection

Wyatt Johansen Property



DISCLAIMER: This information is believed to be correct but is subject to change and is not warranted.

Proposed Amended Route

200' Corridor

Residence > 500'

0 200 400 US Feet



**In the Matter of the Route Permit
Application for the Minnesota Energy
Connection Project**

CERTIFICATE OF SERVICE

MPUC Docket Nos. E002/TL-22-132

Breann L. Jurek certifies that on the 23rd day of December , 2025, she e-filed on behalf of Northern States Power Company, doing business as Xcel Energy, a true and correct copy of the following documents:

- Reply Comments, with Attachment A; and
- Certificate of Service,

with the Minnesota Public Utilities Commission via eDockets (www.edockets.state.mn.us). Said documents were also served on the Official Service List of record on file with the Minnesota Public Utilities Commission and as attached hereto.

Executed on: December 23, 2025

Signed: /s/ Breann L. Jurek

Fredrikson & Byron, P.A.

60 South Sixth Street

Suite 1500

Minneapolis, MN 55402

#	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	22-132Official
2	Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy		414 Nicollet Mall FI 5 Minneapolis MN, 55401 United States	Electronic Service		No	22-132Official
3	David	Bell	david.bell@state.mn.us		Department of Health	POB 64975 St. Paul MN, 55164 United States	Electronic Service		No	22-132Official
4	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission		Electronic Service		No	22-132Official
5	Todd	Boonstra	todd_boonstra@fws.gov	U.S. Fish and Wildlife Service		22274 615th Ave Litchfield MN, 55355 United States	Electronic Service		No	22-132Official
6	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	22-132Official
7	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	22-132Official
8	Water Programs	Coordinator	waterprograms.bwsr@state.mn.us		Minnesota Board of Water and Soil Resources	520 Lafayette Road N St. Paul MN, 55155 United States	Electronic Service		No	22-132Official
9	Ian M.	Dobson	ian.m.dobson@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	22-132Official
10	Randall	Doneen	randall.doneen@state.mn.us		Department of Natural Resources	500 Lafayette Rd, PO Box 25 Saint Paul MN, 55155 United States	Electronic Service		No	22-132Official
11	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	22-132Official
12	Bret	Eknes	bret.eknes@state.mn.us		Public Utilities Commission	Suite 350 121 7th Place East St. Paul MN, 55101-2147 United States	Electronic Service		No	22-132Official
13	Kate	Fairman	kate.fairman@state.mn.us		Department of Natural Resources	Box 32 500 Lafayette Rd St. Paul MN, 55155-4032 United States	Electronic Service		No	22-132Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
14	Annie	Felix Gerth	annie.felix-gerth@state.mn.us			Board of Water & Soil Resources 520 Lafayette Rd Saint Paul MN, 55155 United States	Electronic Service		No	22-132Official
15	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	22-132Official
16	Scott	Groux	scott.groux@aes.com	Birch Coulee Solar LLC		2180 S 1300 E Suite 500 Salt Lake City UT, 84106 United States	Electronic Service		No	22-132Official
17	Kari	Howe	kari.howe@state.mn.us		DEED	332 Minnesota St, #E200 1ST National Bank Bldg St. Paul MN, 55101 United States	Electronic Service		No	22-132Official
18	Dean	Hunter	dean.hunter@state.mn.us		Minnesota Department of Labor & Industry	443 Lafayette Rd N St. Paul MN, 55155-4341 United States	Electronic Service		No	22-132Official
19	Breann	Jurek	bjurek@fredlaw.com	Fredrikson & Byron PA		60 S Sixth St Ste 1500 Minneapolis MN, 55402 United States	Electronic Service		No	22-132Official
20	Raymond	Kirsch	raymond.kirsch@state.mn.us		Department of Commerce	85 7th Place E Ste 500 St. Paul MN, 55101 United States	Electronic Service		No	22-132Official
21	Chad	Konickson	chad.konickson@usace.army.mil	U.S.Army Corps of Engineers		332 Minnesota St. Suite E1500 Saint Paul MN, 55101 United States	Electronic Service		No	22-132Official
22	Nicholas	Korn	njkorn@gmail.com			27445 County Road 23 Albany MN, 56307 United States	Electronic Service		No	22-132Official
23	Stacy	Kotch Egstad	stacy.kotch@state.mn.us		MINNESOTA DEPARTMENT OF TRANSPORTATION	395 John Ireland Blvd. St. Paul MN, 55155 United States	Electronic Service		No	22-132Official
24	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	22-132Official
25	Dawn S	Marsh	dawn_marsh@fws.gov	U.S. Fish & Wildlife Service		Minnesota-Wisconsin Field Offices 4101 American Blvd E Bloomington MN, 55425 United States	Electronic Service		No	22-132Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
26	James	Mortenson	james.mortenson@state.mn.us		Office of Administrative Hearings	PO BOX 64620 St. Paul MN, 55164-0620 United States	Electronic Service		No	22-132Official
27	Carol A.	Overland	overland@legalelectric.org		Legalelectric - Overland Law Office	1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	22-132Official
28	Stephen	Rakow	stephen.rakow@state.mn.us		Department of Commerce	Suite 280 85 Seventh Place East St. Paul MN, 55101-2198 United States	Electronic Service		No	22-132Official
29	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	22-132Official
30	Stephan	Roos	stephan.roos@state.mn.us		Minnesota Department of Agriculture	625 Robert St N Saint Paul MN, 55155-2538 United States	Electronic Service		No	22-132Official
31	Janet	Shaddix Eling	jshaddix@janetshaddix.com		Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	22-132Official
32	Bria	Shea	bria.e.shea@xcelenergy.com		Xcel Energy	414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	22-132Official
33	Suzanne	Todnem	suzanne.todnem@state.mn.us		Office of Administrative Hearings	600 Robert Street North PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		No	22-132Official
34	Jayme	Trusty	execdir@swrdc.org		SWRDC	2401 Broadway Ave #1 Slayton MN, 56172 United States	Electronic Service		No	22-132Official
35	Jen	Tyler	tyler.jennifer@epa.gov		US Environmental Protection Agency	Environmental Planning & Evaluation Unit 77 W Jackson Blvd. Mailstop B-19J Chicago IL, 60604-3590 United States	Electronic Service		No	22-132Official
36	Garrick	Valverde	garrick.valverde@apexcleanenergy.com		Apex Clean Energy	8665 Hudson Boulevard North Suite 200 Lake Elmo MN, 55042 United States	Electronic Service		No	22-132Official
37	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	22-132Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
38	Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources		500 Lafayette Road Box 25 St. Paul MN, 55155-4040 United States	Electronic Service		No	22-132Official
39	Alan	Whipple	sa.property@state.mn.us		Minnesota Department Of Revenue	Property Tax Division 600 N. Robert Street St. Paul MN, 55146-3340 United States	Electronic Service		No	22-132Official
40	Jonathan	Wolfgram	jonathan.wolfgram@state.mn.us		Office of Pipeline Safety	445 Minnesota St Ste 147 Woodbury MN, 55125 United States	Electronic Service		No	22-132Official