



414 Nicollet Mall
Minneapolis, MN 55401

December 12, 2019

Mr. Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

—Via Electronic Filing—

Re: REPLY COMMENTS
REQUEST FOR A MINOR ALTERATION TO XCEL ENERGY'S 115kV
TRANSMISSION LINE 0881 IN COTTAGE GROVE, MINNESOTA
DOCKET No. E002/MC-19-697

Dear Mr. Wolf:

On November 4, 2019, Northern States Power Company (doing business as Xcel Energy,) a Minnesota Corporation, filed a request with the Minnesota Public Utilities Commission (Commission) for a Minor Alteration of its existing 115kV transmission line in Cottage Grove, Minnesota. The Minor Alteration is a 0.6-mile re-route of existing Line #0881 to supply energy to a single customer – Airgas, LLC.

Commission staff published Notice of the request online and sent direct mail to all nearby landowners, and local, state, and federal government officials with jurisdiction over land and resources within the project area. Public comments were accepted through December 5, 2019.

During the public comment period, two comment letters were received. The Minnesota Department of Commerce Energy Environmental Review and Analysis Unit (DOC-EERA) described its review of the human and environmental impacts of the proposed project, and recommended Commission approval of the Minor Alteration request, with associated conditions. And the Metropolitan Council's Local Planning Assistance Unit filed comments related to project area infrastructure and pre-construction coordination.

Xcel Energy appreciates the opportunity to respond in support of these comments and to provide additional information regarding our request for a Minor Alteration.

REPLY COMMENTS

DOC-EERA Comments

Xcel Energy concurs with DOC-EERA's assessment that the proposed Minor Alteration does not result in significant changes to the human and environmental impacts of the existing facility, per Minn. Rule 7850.4100, and appreciates its recommendation to the Commission that the Minor Alteration be approved.

In its comments, DOC-EERA recommends the Commission impose conditions on the authorization of the Minor Alteration request. Xcel Energy finds these conditions to be reasonable, and can and will comply with each of the pre-construction and post-construction conditions, should the Commission choose to adopt them.

DOC-EERA also requested two additional pieces of information to complete the record in this matter. First, a schematic drawing of the in-and-out tap configuration of Line 0881. And second, Department of Natural Resources November 26, 2019, concurrence of impact avoidance measures. Both documents are attached to these Reply Comments.

Metropolitan Council

Metropolitan Council's Local Planning Assistance Unit filed comments regarding Interceptor 9701 near the intersection of Miller Road and 100th Street South. The interceptor is a 54-inch diameter, reinforced concrete pipe buried at a 9-foot depth. Xcel Energy can confirm that the project will not affect the pipe itself, nor access to it should maintenance be required. Nevertheless, Xcel Energy will share final plan and profile drawings with Metropolitan Council Environmental Services, as requested, prior to project construction to verify no impacts will occur to their infrastructure.

CONCLUSION

Based on the information included on the record, Xcel Energy believes the proposed alteration of Line 0881 does not significantly change the human or environmental impacts of the existing facility, and respectfully requests the Commission approve this Minor Alteration.

If there are any questions regarding this filing, please contact Matt Langan, Xcel Energy, at (612) 330-6954 or Matthew.A.Langan@xcelenergy.com.

Sincerely,

A handwritten signature in black ink that reads "Matt Langan". The signature is written in a cursive, flowing style.

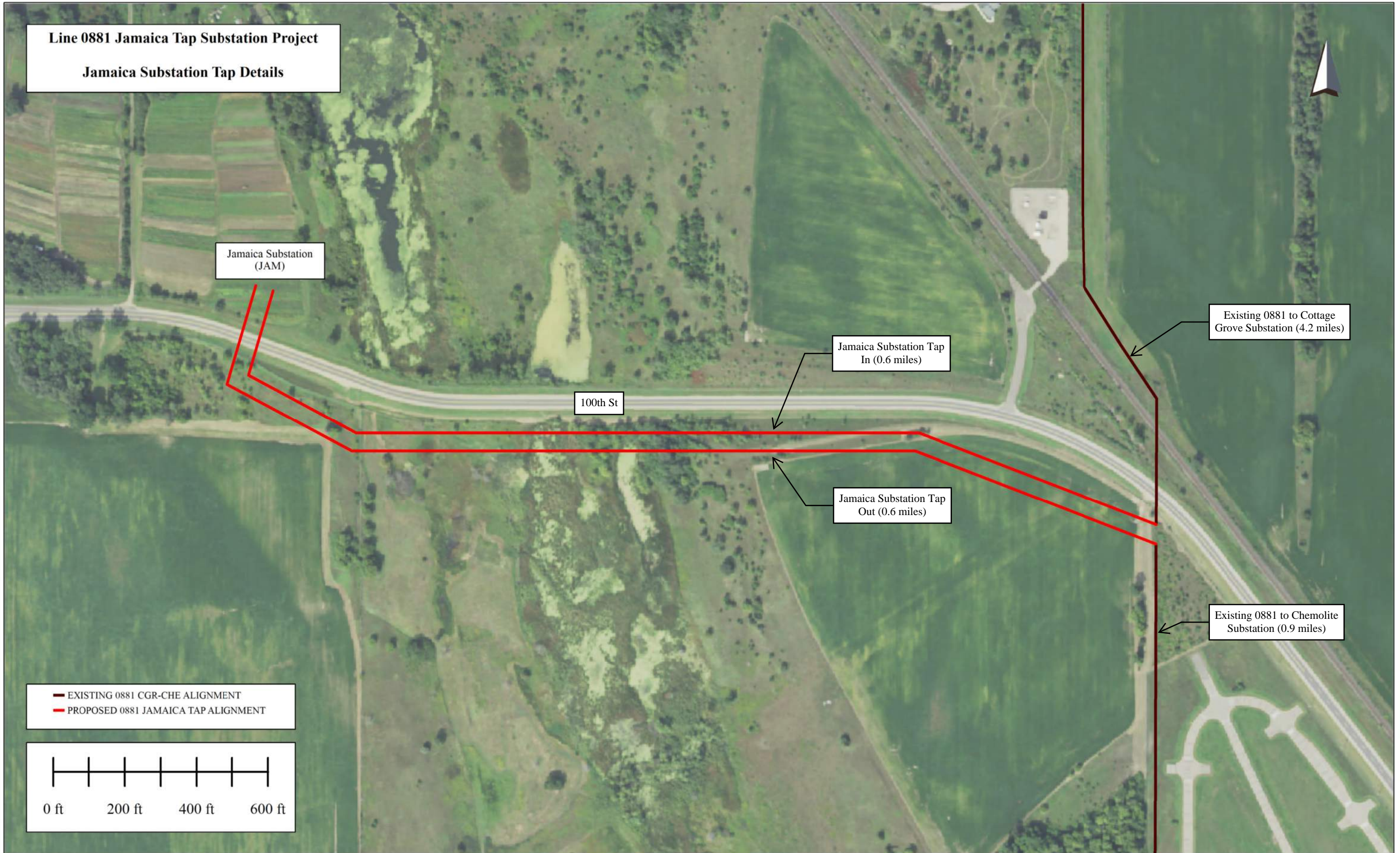
MATTHEW A. LANGAN
PRINCIPAL AGENT
XCEL ENERGY

Enclosures

cc: Service List

Line 0881 Jamaica Tap Substation Project

Jamaica Substation Tap Details



— EXISTING 0881 CGR-CHE ALIGNMENT
— PROPOSED 0881 JAMAICA TAP ALIGNMENT

0 ft 200 ft 400 ft 600 ft

Langan, Matthew A

From: Bump, Samantha (DNR) <samantha.bump@state.mn.us>
Sent: Tuesday, November 26, 2019 11:10 AM
To: Langan, Matthew A
Cc: Warzecha, Cynthia (DNR); Horton, Becky (DNR)
Subject: RE: FW: NHIS Data Search: Request for Concurrence
Attachments: NHIS Request for Concurrence_100319 .pdf

**CAUTION EXTERNAL SENDER: Stop and consider before you click links or open attachments.
Report suspicious email using the 'Report Phishing/Spam' button in Outlook.**

Hi Matthew,

I have reviewed the attached assessment of the potential for the above project to impact rare features, and concur with your assessment that impacts to known occurrences of rare features are not anticipated. Please contact me if the timing of site preparation changes. Thank you for notifying us of this project, and for the opportunity to provide comments.

Have a great day,

Samantha Bump

NHIS Review Specialist | Ecological & Water Resources

Minnesota Department of Natural Resources

500 Lafayette Road

St. Paul, MN 55155

Phone: 651-259-5091

Samantha.Bump@state.mn.us



From: Joyal, Lisa (DNR) <lisa.joyal@state.mn.us>
Sent: Thursday, November 21, 2019 11:33 AM
To: Bump, Samantha (DNR) <samantha.bump@state.mn.us>
Subject: DUE 11.27 - FW: NHIS Data Search: Request for Concurrence

From: Langan, Matthew A [<mailto:Matthew.A.Langan@xcelenergy.com>]
Sent: Friday, October 04, 2019 1:03 PM
To: Joyal, Lisa (DNR) <lisa.joyal@state.mn.us>
Cc: Warzecha, Cynthia (DNR) <cynthia.warzecha@state.mn.us>; Fritz, James W <James.W.Fritz@xcelenergy.com>
Subject: NHIS Data Search: Request for Concurrence

Hi Lisa – Please see the attached letter, maps, and shapefiles related to a proposed 0.5-mile transmission line in Cottage Grove. There are element occurrences of Bell’s Vireo and Loggerhead Shrike near the project site based on our 2019 NHIS database search, and we are proposing impact avoidance measures we’d like your program’s direction on. Thanks for your review. Feel free to call or email with any questions.

-Matt

Matt Langan

Xcel Energy | Responsible By Nature

Principal Agent, Siting and Land Rights

414 Nicollet Mall, 414-6A, Minneapolis, MN 55401

P: 612.330.6954 F: 612 330-6357

E: matthew.a.langan@xcelenergy.com



414 Nicollet Mall
Minneapolis, MN 55401

October 3, 2019

—Via Electronic Filing—

Lisa Joyal
Program Coordinator
Minnesota Department of Natural Resources
500 Lafayette Rd, Box 25
St. Paul, Minnesota 55155

RE: REQUEST FOR CONCURRENCE
NHI REVIEW
COTTAGE GROVE 115KV TAP LINE PROJECT

Dear Ms Joyal:

Xcel Energy is proposing a 3000-foot extension of Line 0881 in Cottage Grove, Washington County, MN to tap into a distribution substation to serve a single customer – Airgas, LLC. The substation site is located on 0.67 acres of land owned by Airgas, which is upland previously used for row-crop agriculture. The 125-foot tap line right-of-way follows the northern border of land owned by 3M, and shares public road right-of-way owned by the City of Cottage Grove. Xcel Energy will apply to the Minnesota Public Utilities Commission for project approval.

A review of Xcel Energy's licensed NHIS 2019 dataset identified records of potential occurrences of Rusty Patched Bumble Bee, Bell's Vireo, and Loggerhead Shrike near the project area.

The Bell's Vireo is a small State-special concern songbird with short, rounded wings and a short, stout bill. This species relies on grassland habitats with some component of shrubs and small trees. Upland habitats are preferred but this species has also been known to nest in wet or riparian habitats as well. ROW corridors attract this songbird due to the presence of small to medium growing shrub species. Site preparation, and tree and shrub clearing in areas of suitable habitat, would be conducted during the winter to avoid any potential for impacts during this species' active nesting season. In addition, a larger amount of contiguous and higher quality habitat exists in the vicinity of the project area, but outside of the project corridor

The Loggerhead Shrike is a State-endangered songbird. It has a gray back, black wings and light colored breast and tail. This white bird has a slim, black tail, large head, hooked black beak and distinctive black mask. Preferred habitat for the shrike includes open, grassy country with scattered shrubs or small trees. Site preparation,

and tree and shrub clearing in areas of suitable habitat, would be conducted during the winter to avoid any potential for impacts during this species' active nesting season. In addition, a larger amount of contiguous and higher quality habitat exists in the vicinity of the project area, but outside of the project corridor

Rusty patched bumble bee require nesting habitat, floral resources, and overwintering habitat. This species typically nests in open areas where it is not heavily forested and not too wet (USFWS, 2018). Overwintering habitat is often in or near woodlands or woodland edges that contain spring blooming herbaceous plants, shrubs, and trees, which allow proximity to woodland spring blooming flowers, particularly spring ephemeral wildflowers, a critical early spring food source. Solitary queens mate in the fall and overwinter roughly from mid-October through mid-March (USFWS, 2018). According to USFWS mapping available in June 2019, the project is located in the low-potential zone for Rusty Patched Bumble Bee. As a result, the species is considered unlikely to be present, and therefore requires no additional avoidance or consultation with U.S. Fish and Wildlife Service.

Xcel Energy is requesting concurrence from the Department of Natural Resources on the accuracy of the NHIS data search results, and the proposed impacts avoidance measures described above.

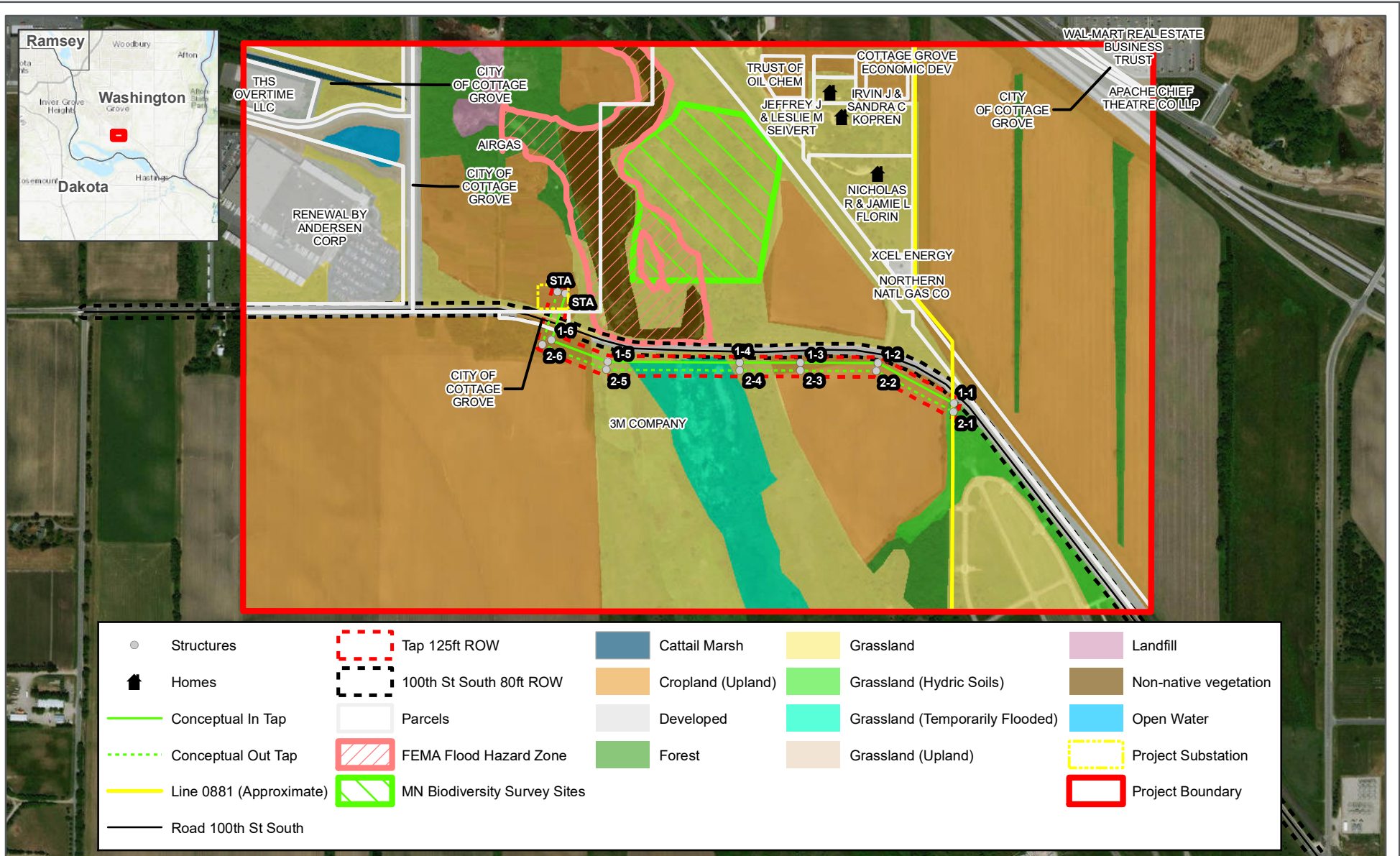
Sincerely,

A handwritten signature in black ink, appearing to read "Matt Langan". The signature is fluid and cursive, with a long horizontal stroke at the end.

MATT LANGAN
PRINCIPAL AGENT, SITING AND LAND RIGHTS

cc: Cynthia Warzecha

Enclosures: Project Maps 1 and 2



Project Area Map 1

Jamaica Substation (Airgas) Application

Xcel Energy

Washington County, Minnesota

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www.cardno.com

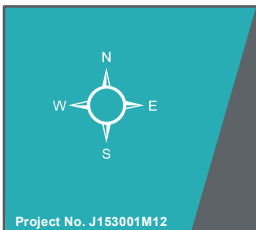
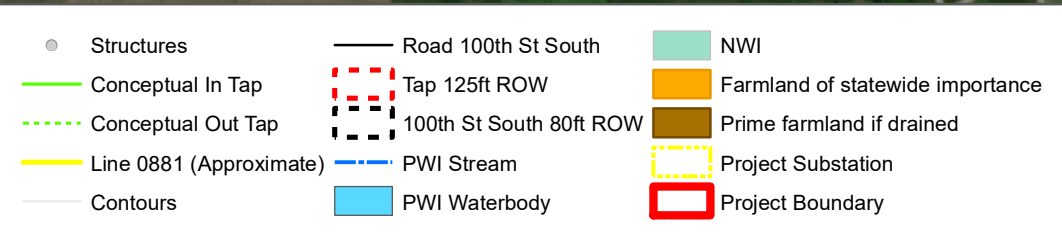
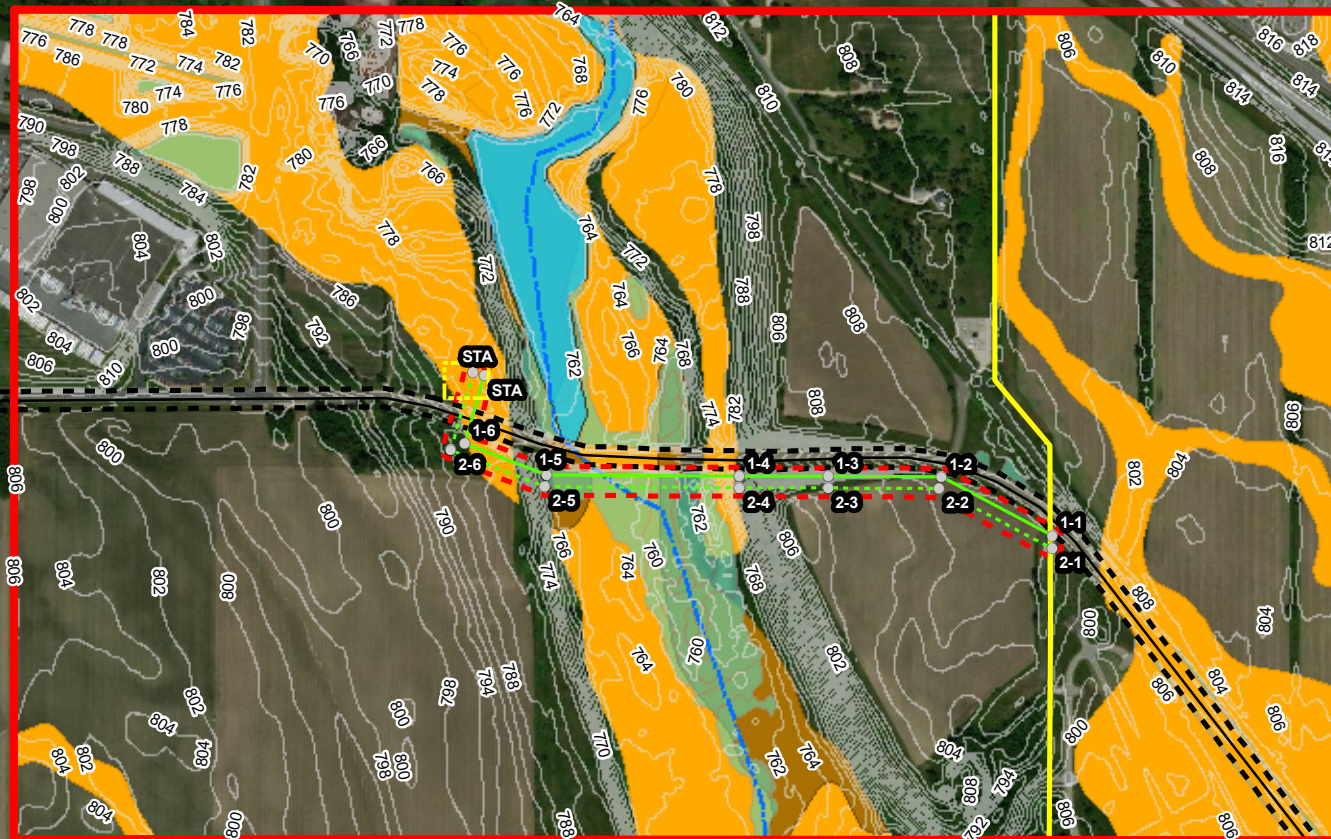
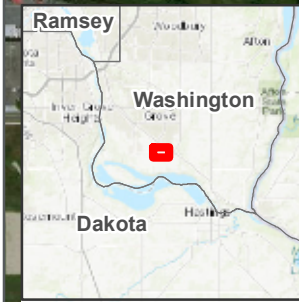
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Date Created: 7/30/2019 Date Revised: 7/30/2019 File Path: \\cardno.corp\Global\US\Shared\CJFNProjects\Projects\151531153001M00_XcelEnergy_Master\M12_CottageGroveSubstation\GIS\MXD\Project Area Map 1.mxd
 Data Sources: ESRI Streets Basemap

GIS Analyst: michael.smith

Project No. J153001M12

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Project Area Map 2

Jamaica Substation (Airgas) Application Xcel Energy Washington County, Minnesota



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