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October 1, 2025

**-Via Electronic Filing-**

Jim Sullivan  
Environmental Review Manager  
Energy Infrastructure Permitting Section  
Minnesota Public Utilities Commission  
121 7th Place East, St. Paul MN 55101

**Re: Design Updates for Consideration for the Lyon County Generating Station Project, Docket Nos. E002/CN-25-145, G002/GS-25-154, E002/TL-25-161 & G002/GP-25-163**

In May 2025, Northern States Power Company, a Minnesota corporation, doing business as Xcel Energy (Applicant or Xcel Energy) submitted to the Minnesota Public Utilities Commission (Commission) a Combined Application (Application) for a Certificate of Need, Site Permit, Transmission Line Route Permit, and Partial Exemption and Pipeline Routing Permit for the Lyon County Generating Station Project in Lyon County, Minnesota (Project). Since that time, as Xcel Energy has discussed with Commission staff, the Project design has been further defined, and Commission staff requested that Xcel Energy describe any design changes so that they may be reflected in the Environmental Assessment (EA) that will be prepared as part of the Commission's process.

**Air Permitting**

Xcel Energy submitted an updated Title V air permit application to the Minnesota Pollution Control Agency (MPCA) on September 24, 2025. This updated permit application and the associated modeling will be provided to Commission staff under separate cover for review and consideration in the EA.

**Removal of Evaporative Coolers**

The May 2025 Application included an optional system for evaporative cooling of the combustion turbines via cooling the inlet air. The system was described in Section 3.1.6 of the Application. After evaluation of water treatment and wastewater disposal options, Xcel Energy has decided to remove the evaporative cooling system from Project design. The evaporative cooling system was the Project's only source for process wastewater. Thus, the evaporative cooling system described in Section 3.1.6 of

the Application will no longer be used. Additionally, the permits for Wastewater General Pond and Water Appropriation identified in Table 9-1 of the Application are no longer relevant. This design change has also been incorporated into updated Title V air permit application as submitted to the MPCA.

### **Emergency Diesel Generators Adjustment**

As described in Sections 1.2 and 3.1 of the Application in May 2025, the Project initially planned for three 750-kilowatt (kW) emergency diesel generators to provide emergency power. After further evaluation, it was determined that a single 1,500 kW emergency diesel generator will meet emergency power requirements. This design change has also been incorporated into updated Title V air permit application as submitted to the MPCA.

### **Summary**

If Commission staff would like additional information on the updates included in this correspondence, or other Project details, do not hesitate to contact me.

Sincerely,

*/s/ Mike Aasen*

Mike Aasen

Project Manager

Xcel Energy