



May 5, 2025

—Via Electronic Filing—

Richard Davis
Environmental Review Manager
Energy Environmental Review and Analysis
Minnesota Department of Commerce
85 7th Place East, Suite 280
Saint Paul, MN 55101

RE: Request to Expand Route Width

IN THE MATTER OF THE APPLICATION FOR A ROUTE PERMIT FOR THE
MANKATO TO MISSISSIPPI RIVER 345 kV TRANSMISSION PROJECT IN
SOUTHEAST MINNESOTA
Docket No. E002/TL-23-157
OAH Docket No. 65-2500-40099

Dear Mr. Davis:

Northern States Power Company, doing business as Xcel Energy, respectfully submits the following request to expand the route width for portions of proposed Route Option 2 North and Route Option 2 South for the Mankato to Mississippi River 345 kilovolt (kV) Transmission Project (MMRT or Project) in the above-referenced docket. Xcel Energy requests that the route width be expanded so that the new 345 kV transmission line can be constructed adjacent to the existing Hampton – North Rochester 345 kV transmission line in new right-of-way rather than double-circuiting with this existing line (see **Attachment A, Figures 1 and 2**).

As discussed below, this change is needed because one of the transmission projects that was recently approved by the Midcontinent Independent Transmission Operator, Inc. (MISO) as part of its Long Range Transmission Planning (L RTP) Tranche 2.1 involves adding a second 345 kV circuit to the existing Hampton to North Rochester 345 kV transmission line (Line 0964). As a result, the proposed MMRT 345 kV line cannot be double-circuited with this existing line as proposed in the Route Permit Application (Application) that was filed in April 2024,¹ and needs to be constructed in a separate alignment.

¹ *In the Matter of the Application of Xcel Energy for a Route Permit for the Mankato – Mississippi River 345 kV Transmission Line Project in Southeast Minnesota, Docket No. E002/TL-23-157, APPLICATION FOR CERTIFICATE OF NEED AND ROUTE PERMIT FOR MANKATO – MISSISSIPPI RIVER TRANSMISSION PROJECT (April 2, 2024).*

Xcel Energy respectfully requests that the Route Permit for this Project include this expanded route width and that Department of Commerce, Energy Environmental Review and Analysis (DOC-EERA) analyze this expanded route width in the final EIS. To help facilitate inclusion of this requested change in the EIS, Xcel Energy has completed an environmental analysis of this expanded route width area and a comparison of the revised right-of-way (ROW) to the ROW proposed in the Application for portions of Route Option 2 North and 2 South.

Xcel Energy will be sending mailed notice of this proposed change to affected landowners and will provide them with information about how to provide comments on the Project and this requested change.

Following is a more detailed summary of the reasons for this request, a description of the revised route width and the associated revised ROW and transmission line alignment, and a summary comparison of the environmental impacts of this change as compared to what was proposed in the Application.

Reason for Request to Expand the Route Width

At the time the Application for the Project was filed in April 2024, Xcel Energy was proposing to place the new 345 kV transmission line on the open position on the existing Hampton – North Rochester 345 kV double-circuit capable transmission structures on the eastern ends of Route Option 2 North and Route Option 2 South.² The proposed 345/345 kV double-circuit portions of Route Option 2 North and Route Option 2 South were approximately 7.05 miles and 2.49 miles in length, respectively (the southern 2.49 miles of Route Option 2 North is a common segment with Route Option 2 South).

In December 2024, MISO approved its LRTP Tranche 2.1 portfolio of projects. One of the projects that was approved was the Pleasant Valley – North Rochester – Hampton Corner 345 kV transmission project (project ID No. 25). The North Rochester – Hampton Corner portion of this project involves adding another 345 kV transmission line on the existing double-circuit capable structures constructed as part of the Hampton – La Crosse 345 kV transmission project. As such, portions of Route Option 2 North and Route Option 2 South need to be constructed parallel to the existing 345 kV transmission line in new ROW rather than being double-circuited with this line.

Description of the Requested Expanded Route Width

In the Application, Xcel Energy requested a typical route with of 1,000 feet (500 feet to either side of the proposed centerline). While most of the ROW for the requested change will fit within the route width included in the Application, there is one location where the requested new ROW bears south and deviates from being parallel to the

² Segments 2C and 2D.

existing line and would extend beyond the route width included in the Application as shown in **Attachment A, Figure 2**. This is because there is a residence located south of the existing line and there is not enough space between the residential buildings and the existing line to construct a new parallel transmission line. Routing north of this residence is not proposed because it would require crossing over the top of the existing 345 kV line and then crossing back over the existing 345 kV line to be south to enter the North Rochester Substation. Crossing over the existing 345 kV line would require significantly taller structures as compared to the existing structures. In addition, line crossings create unique safety, reliability, and resiliency concerns and thus Xcel Energy tries to minimize new line crossings to the extent practical.

In this location, Xcel Energy requests that the route width be expanded to include area within 500 feet of the new proposed transmission centerline as shown in **Attachment A, Figures 1 and 2**.

Environmental Analysis of the Requested Change

Xcel Energy analyzed environmental and related data associated with the requested expanded route width area.³ A summary of the size of the requested change is included in **Table 1** below. The environmental data reviewed is similar to what was included in the Application and is summarized below and in the tables included in **Attachment B**. **Attachment A, Figures 2-7** include the location of environmental resources associated with this analysis. Land use within the revised ROW is summarized in **Attachment B, Tables 2 and 3**.

Table 1. Size of Requested Change

	Route Option 2 North	Route Option 2 South
Length (miles)	7.05	2.49
Total ROW area (acres)	128.3	45.4
Expanded Route Width (acres)	24.6	24.6

Residences

In addition to related human settlement topics discussed in the Application, Xcel Energy summarizes residence information of the expanded route width and new proposed ROW (see **Attachment B, Table 1**). No new residences were identified within the expanded route width (see **Attachment A, Figures 2-5**). For Route Option 2 North, there are two fewer residences located within 500 feet of the revised centerline as compared to the centerline proposed in the Application. For Route Option 2 South,

³ Note that since the expanded route width is a relatively small area, many of the environmental resources and impacts discussed in the Application still apply and few changes were identified in assessing this expanded route width area.

there are the same number of residences within 500 feet of the revised centerline as compared to the centerline proposed in the Application.

Water Resources

Xcel Energy conducted a review of National Wetland Inventory (NWI) (Minnesota Department of Natural Resources 2019) and related water resources data of the proposed expanded route width and new ROW associated with this request. With the exception of one additional wetland, no new water resources were identified in this review (see **Attachment A, Figures 3-5, and Attachment B, Tables 4 and 5**). There is one additional freshwater emergent wetland within the proposed expanded route width and associated new ROW as compared to the Application. Impacts would either be avoided by spanning the wetland or by slightly revising the route to avoid this wetland if this route is selected. All other natural environment effects from the proposed new route width and ROW are expected to be similar to those identified in the Application.

Rare and Unique Natural Resources, Wilderness Areas, and Parks and Natural Areas

Updated reviews of USFWS Information for Planning and Consultation (IPaC) data and Minnesota Department of Natural Resources NHIS data (LA-2023-034) were performed for the proposed expanded route width and new ROW associated with this request. No new rare and unique resources, wilderness areas, or parks and natural areas were identified in this review and there is no change to impacts assessment included in the Application. See **Attachment A, Figures 3-5, and Attachment B, Tables 4 and 5**.

Cultural Resources

The expanded route width and revised proposed ROW would not impact any new archaeological sites or historic properties as compared to the Application. Thus, there is no change in the impacts or recommendations filed in Application.⁴ Identified sites are shown in **Attachment A, Figure 7** and summarized in **Attachment B, Tables 4 and 5**.

Conclusion

Environmental analysis of Xcel Energy's proposed request to expand the route width indicates minimal and minor changes to affected environmental resources. Xcel Energy will contact landowners impacted by this proposed change to notify them of this request and inform them of the opportunity to comment on the Project.

Xcel Energy respectfully requests that the Route Permit for this Project include this expanded route width and that DOC-EERA analyze this expanded route width in the final EIS.

⁴ Application at 239-240.

We have electronically filed this document with the Commission. Copies are also being served on persons on the attached service list. Please contact me at 612-330-6073 or ellen.l.heine@xcelenergy.com if you have any questions regarding this filing.

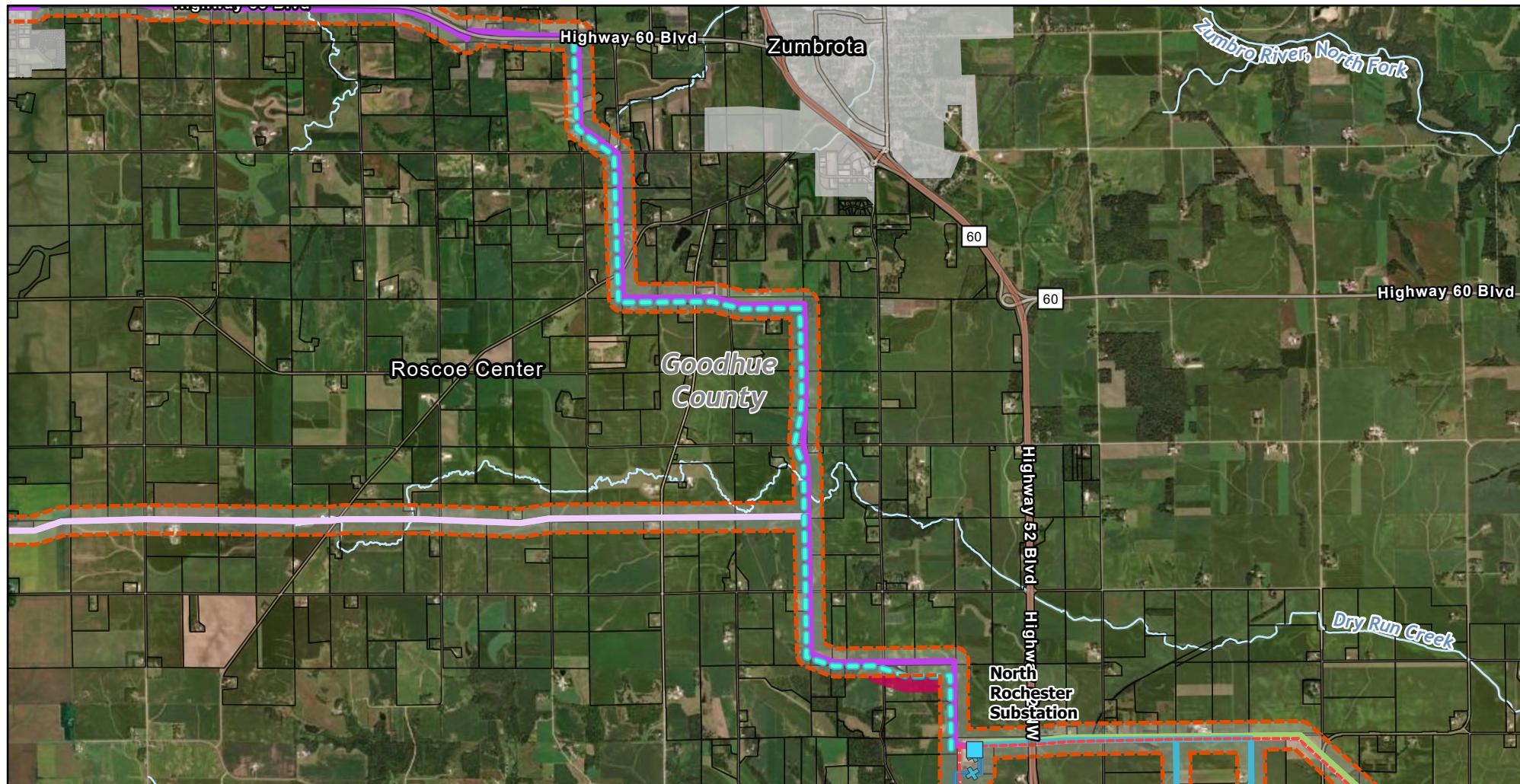
Sincerely,

/s/ Ellen L. Heine

ELLEN L. HEINE
PRINCIPAL SITING AND PERMITTING AGENT
NORTHERN STATES POWER COMPANY

cc: Service List

FIGURE 1 OVERVIEW OF REQUESTED CHANGE TO ROUTE OPTIONS 2 NORTH AND 2 SOUTH



LEGEND

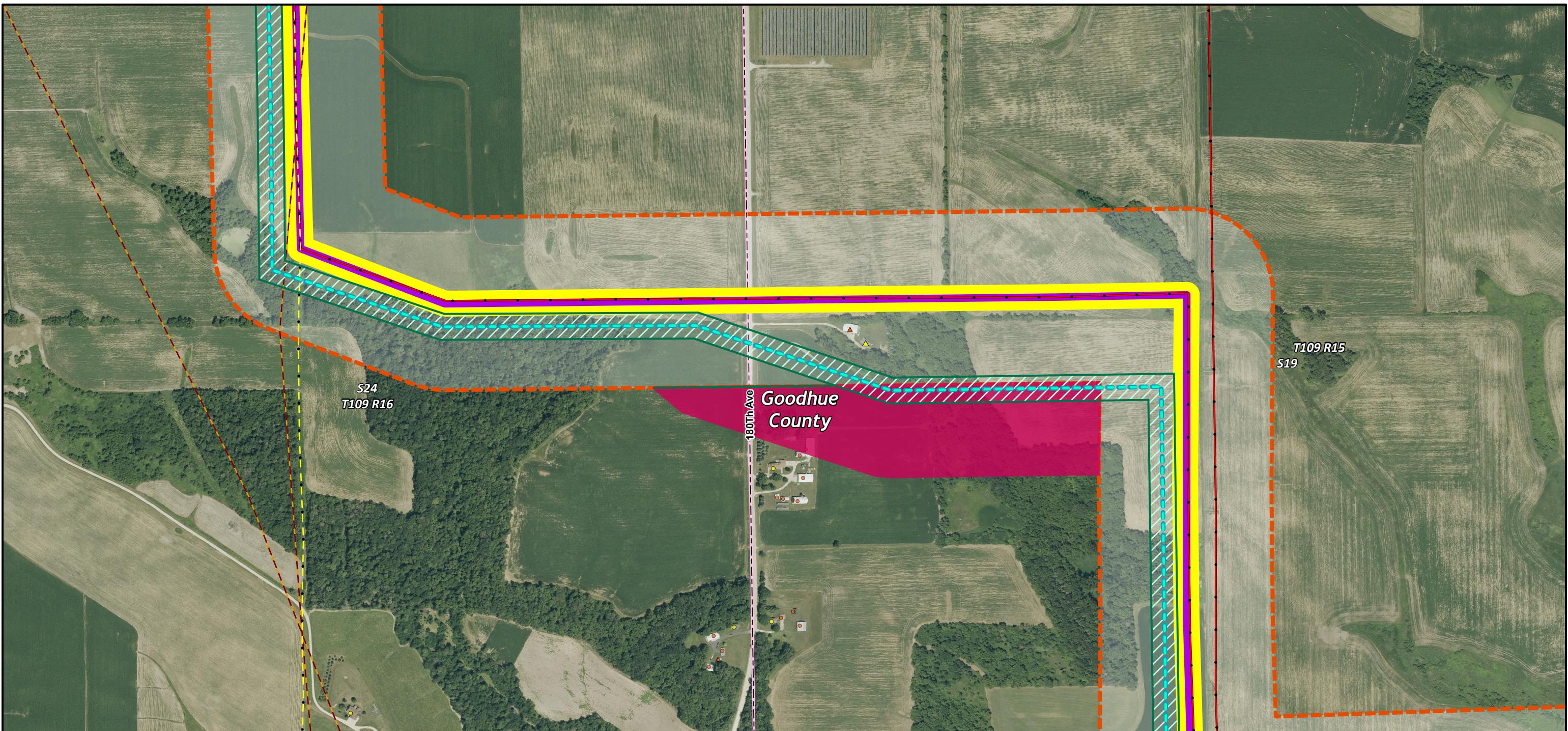
- Project Substation
- Proposed Route Option
 - 2 North
 - 2 South
 - 3
 - 4 East
 - 4 West

- 4 West - A (Route Segment 13)
- EIS Scoping Alignment/Route Alternative
- Revision to Route Option 2
- Route Width Expansion Area
- RPA Route Width
- Parcel



MINNESOTA COUNTIES: GOODHUE, WABASHA, BLUE EARTH, WINONA, DODGE, OLMSTED, LE SUEUR, RICE, AND WASECA

FIGURE 2: ROUTE WIDTH EXPANSION AREA



LEGEND

- Proposed Route
- Proposed Right-of-Way
- Pipeline in Study Area (NPMS)
- Existing Transmission Line
- 69 kV
- 345 kV
- Township Boundary
- Structure in Proposed Route
- Residence
- Not a residence
- Revision to Route Option 2 Right-of-Way
- Revision to Route Option 2
- 2 North

Structure Outside Proposed Route

- Residence
- Not a residence

Route Width Expansion Area

- Revision to Route Option 2 Right-of-Way
- Revision to Route Option 2
- 2 North

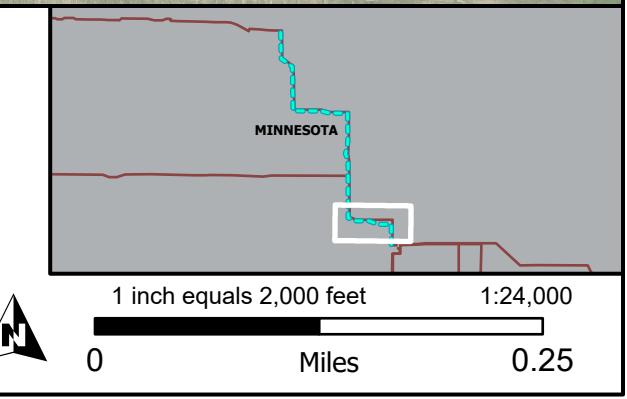
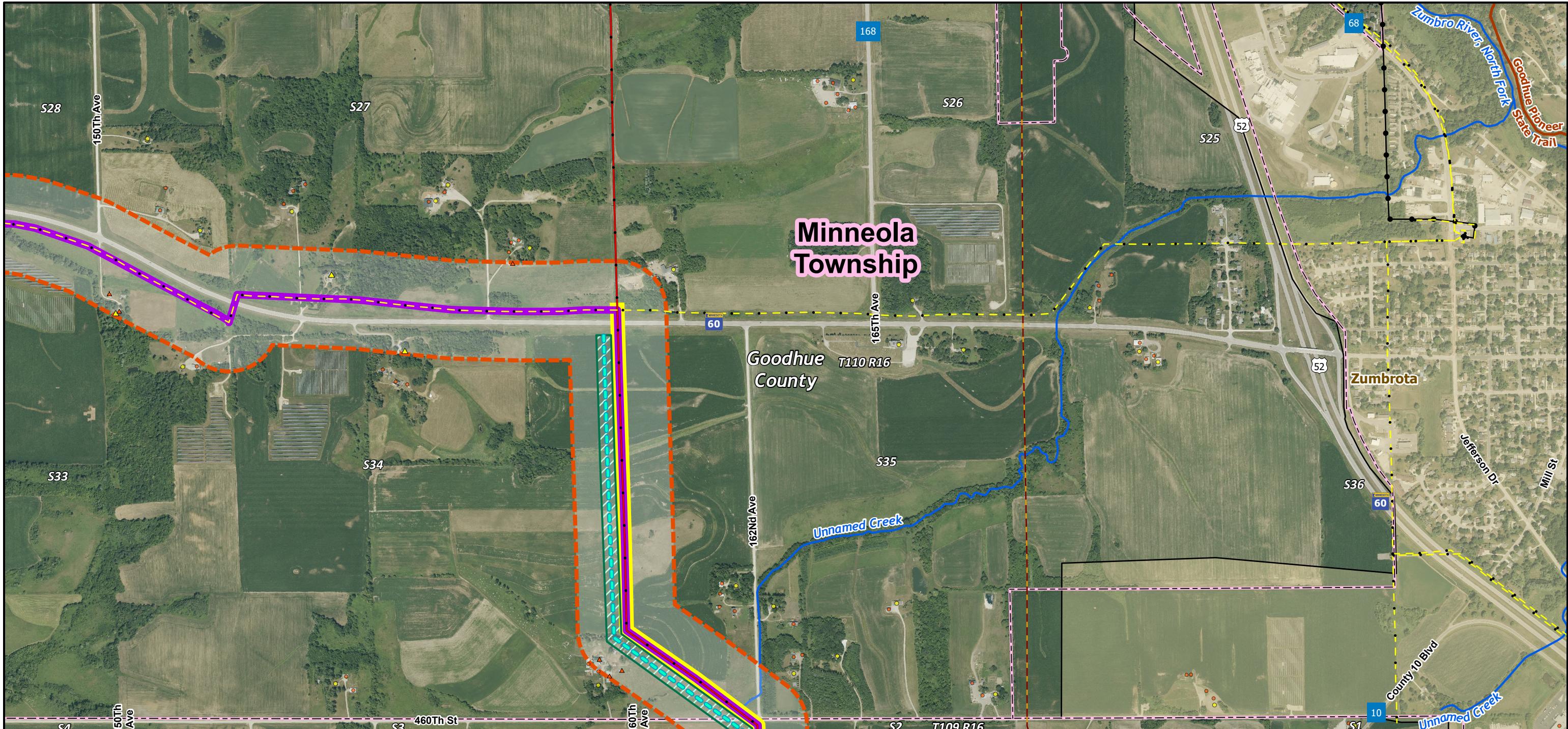


FIGURE 3: DETAIL MAPS OF REQUESTED CHANGE TO ROUTE OPTIONS 2 NORTH AND 2 SOUTH



LEGEND

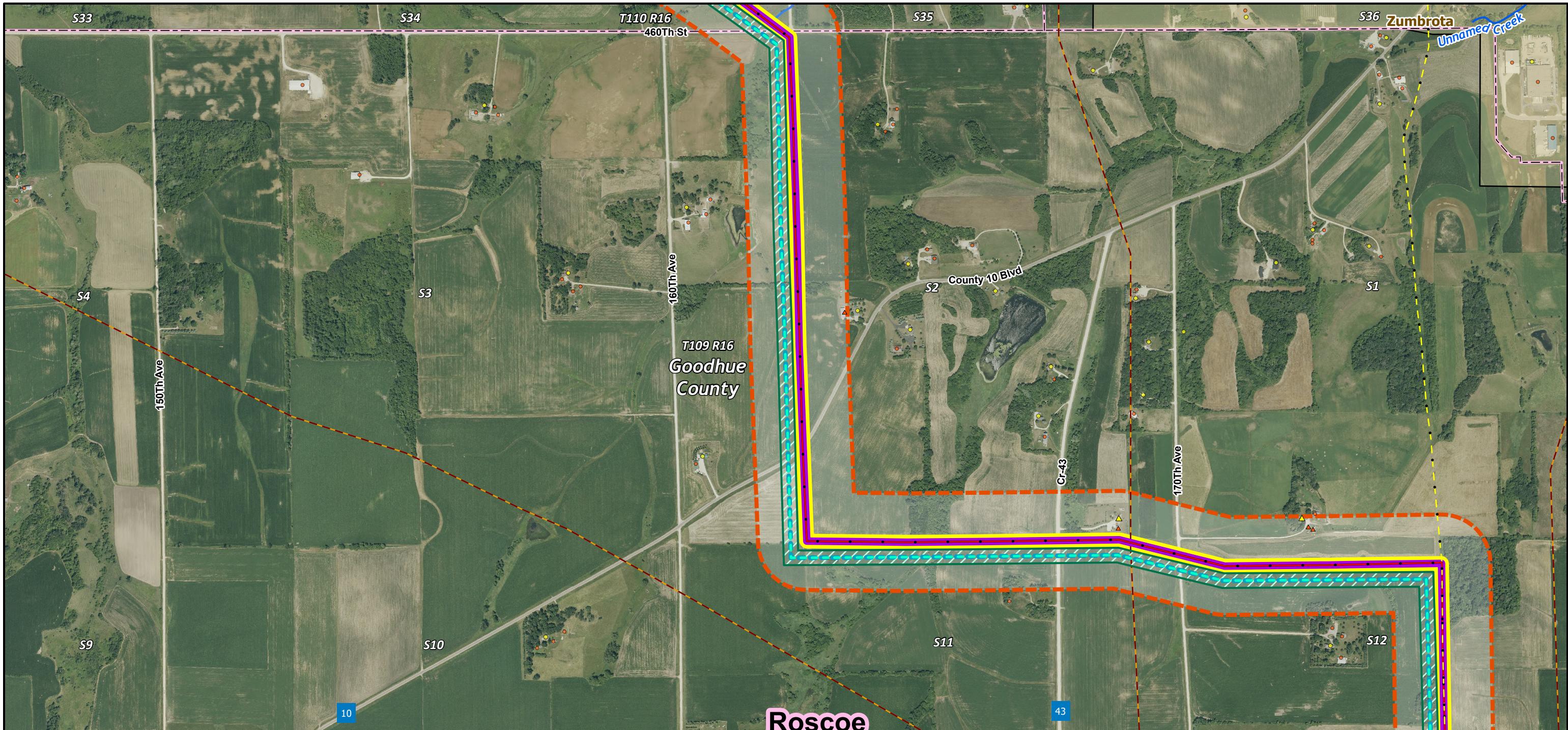
- Proposed Route
- Proposed Right-of-Way
- Pipeline in Study Area (NPMS)
- Existing Transmission Line
 - 69 kV
 - 345 kV

- Unknown
- Township Boundary
- Public Water Watercourse
- Structure in Proposed Route
 - Residence
 - Not a residence
- Residence
- Not a residence

- Structure Outside Proposed Route
 - Residence
 - Not a residence
- Proposed Route Option
 - 2 North
- Route Width Expansion Area
- Revision to Route Option 2 Right-of-Way
- Revision to Route Option 2
- Project Substation

Page 1 of 4

FIGURE 3: DETAIL MAPS OF REQUESTED CHANGE TO ROUTE OPTIONS 2 NORTH AND 2 SOUTH



LEGEND

- Proposed Route
- Proposed Right-of-Way
- Pipeline in Study Area (NPMS)
- Existing Transmission Line
- 69 kV

- 345 kV
- Township Boundary
- Public Water Watercourse
- Structure in Proposed Route
- Residence
- Not a residence

- Structure Outside Proposed Route
- Residence
- Not a residence
- Proposed Route Option
- 2 North

- Route Width Expansion Area
- Revision to Route Option 2 Right-of-Way
- Revision to Route Option 2
- Project Substation

Page 2 of 4

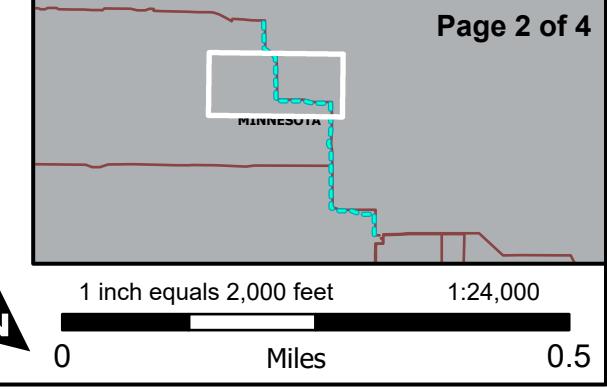
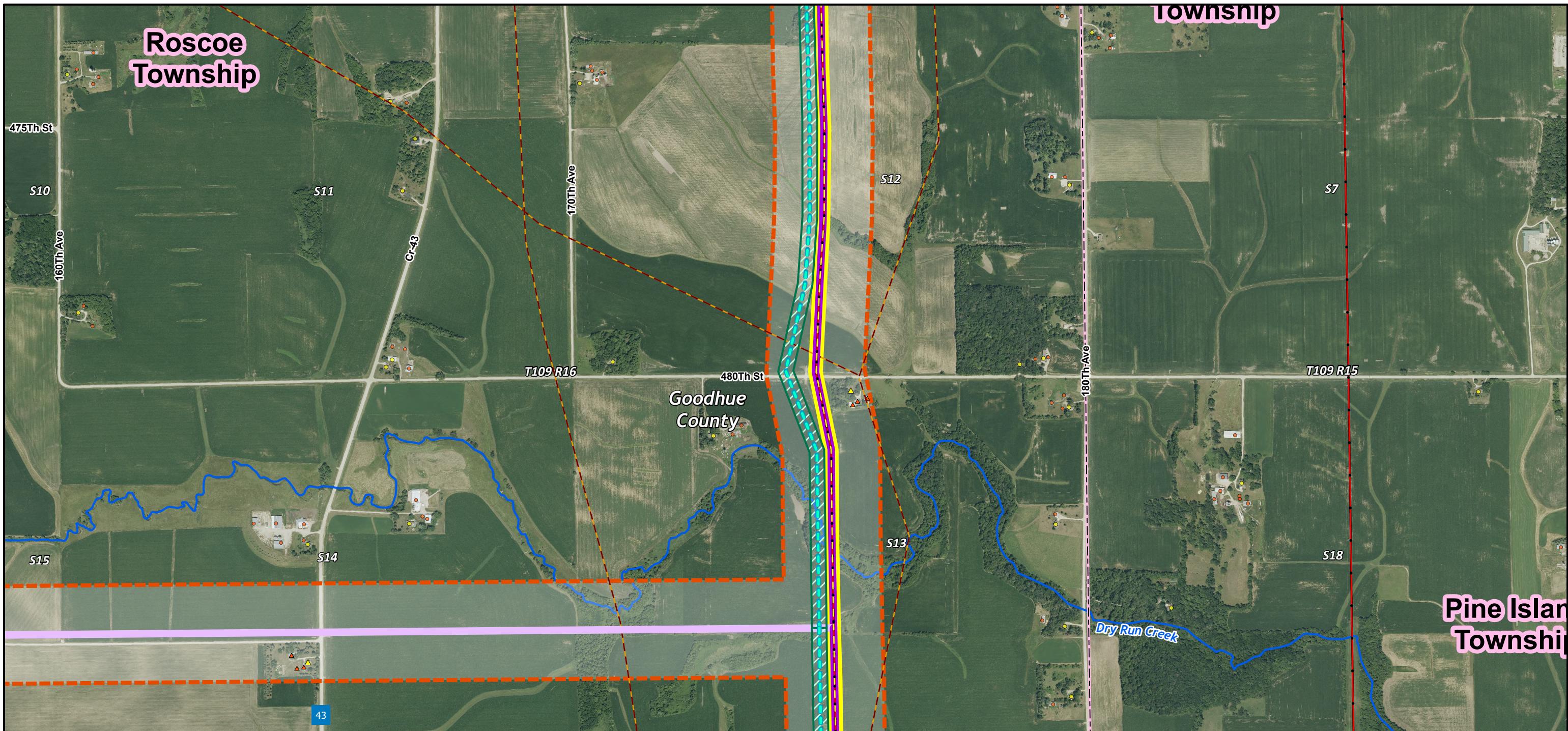


FIGURE 3: DETAIL MAPS OF REQUESTED CHANGE TO ROUTE OPTIONS 2 NORTH AND 2 SOUTH



LEGEND

- Proposed Route
- Proposed Right-of-Way
- Pipeline in Study Area (NPMS)
- Existing Transmission Line
- 69 kV
- 345 kV
- Township Boundary
- Public Water Watercourse
- Structure in Proposed Route
- Residence
- Not a residence

- Proposed Route
- Proposed Right-of-Way
- Pipeline in Study Area (NPMS)
- Existing Transmission Line
- 69 kV
- 345 kV
- Township Boundary
- Public Water Watercourse
- Structure in Proposed Route
- Residence
- Not a residence
- Structure Outside Proposed Route
- Residence
- Not a residence
- Revision to Route Option 2 Right-of-Way
- Revision to Route Option 2
- 2 North
- Route Width Expansion Area
- Project Substation

- 2 South
- Route Width Expansion Area
- Revision to Route Option 2 Right-of-Way
- Revision to Route Option 2
- 2 North

Page 3 of 4

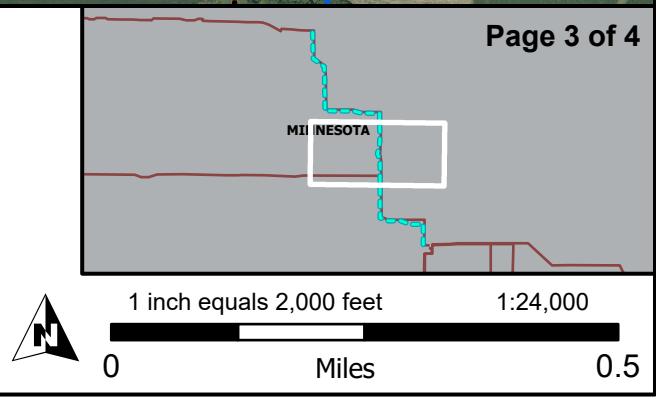
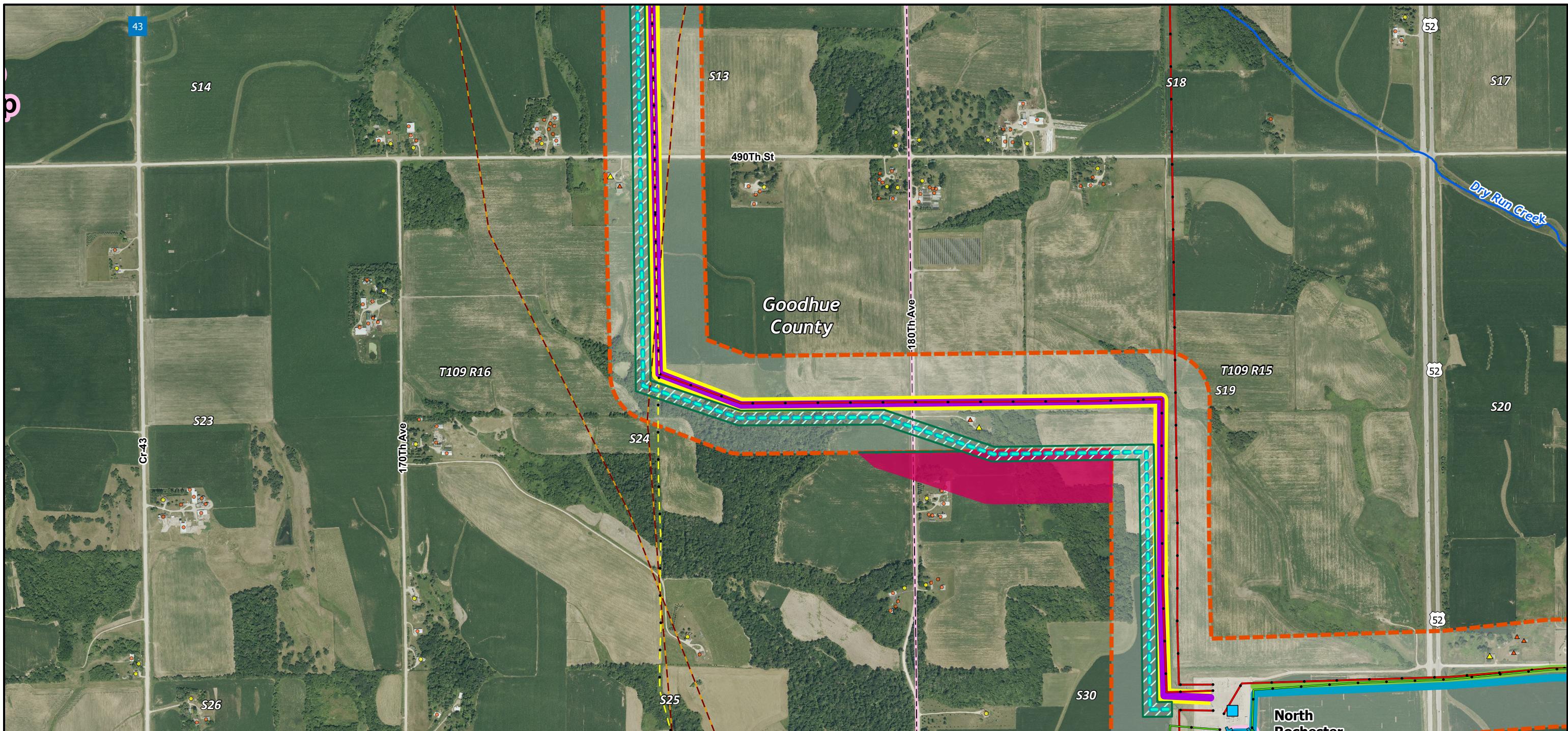


FIGURE 3: DETAIL MAPS OF REQUESTED CHANGE TO ROUTE OPTIONS 2 NORTH AND 2 SOUTH



LEGEND

- Proposed Route
- Existing Transmission Line
- Project Substation
- Pipeline in Study Area (NPMS)
- 69 kV
- 161 kV
- 345 kV
- Township Boundary
- Public Water Watercourse

- Structure in Proposed Route
- Residence
- Not a residence
- Structure Outside Proposed Route
- Residence
- Not a residence

- Not a residence
- Proposed Route Option
- 2 North
- 3
- 4 East
- 4 West - A
- Route Width Expansion Area
- Revision to Route Option 2 Right-of-Way
- Revision to Route Option 2
- Project Substation

Page 4 of 4

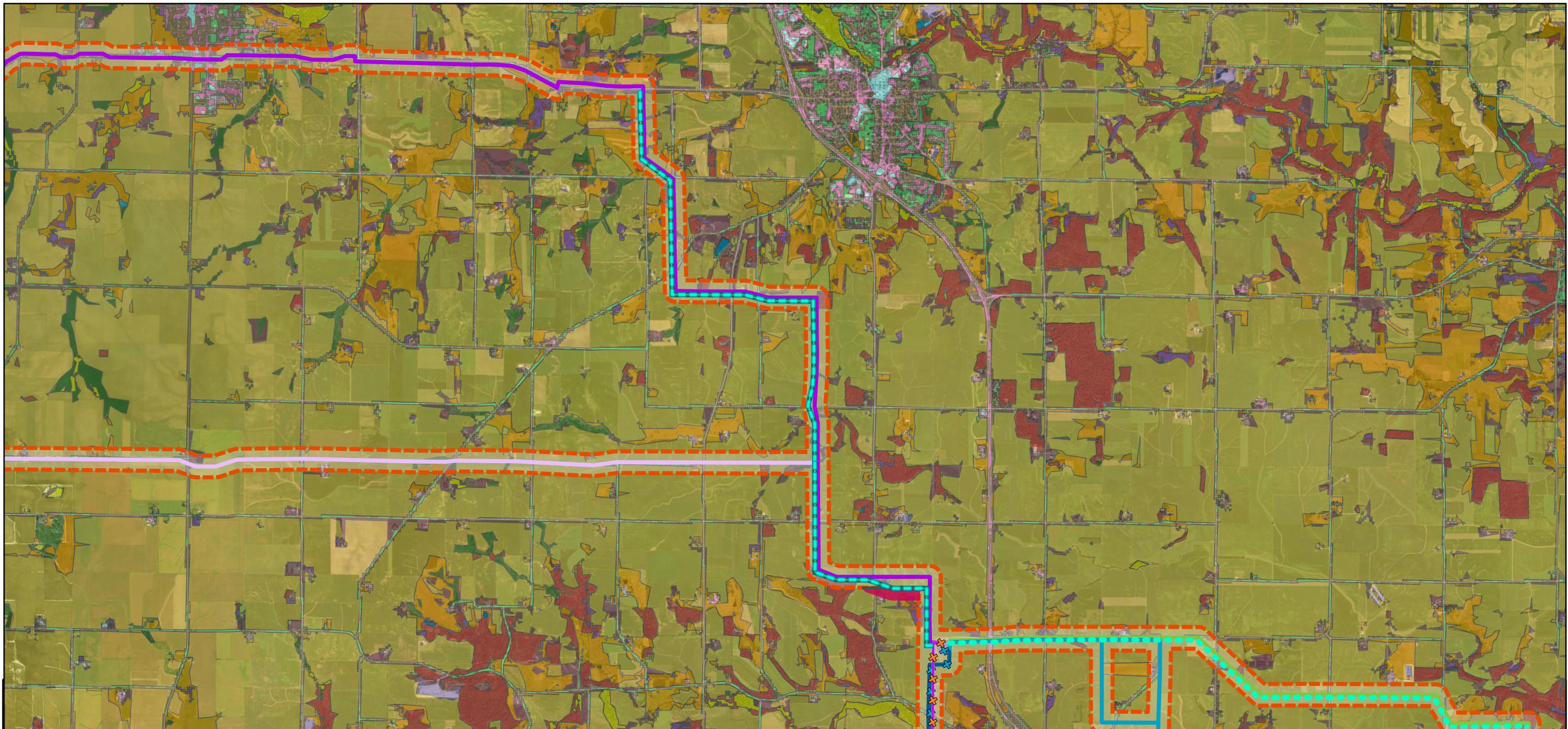
1 inch equals 2,000 feet

1:24,000

0 Miles 0.5 Miles

FIGURE 4: NLCD LAND COVER

FEB 28TH, 2025

 Xcel Energy®


LEGEND

Proposed Route Option

- 2 North
- 2 South
- 3
- 4 East
- 4 West
- 4 West - A

Alternative

Hwy 14

Proposed Route

Route Width Expansion Area

Revision to Route Option 2 Right-of-Way

Revision to Route Option 2

NLCD 2021 Landuse Description

Barren Land (Rock/Sand/Clay)

Cultivated Crops

Developed, High Intensity

Developed, Low Intensity

Developed, Medium Intensity

Evergreen Forest

Grassland/Herbaceous

Hay/Pasture

Mixed Forest

Open Water

Developed, Open Space

Emergent Herbaceous

Deciduous Forest

Wetlands

Shrub/Scrub

Woody Wetlands

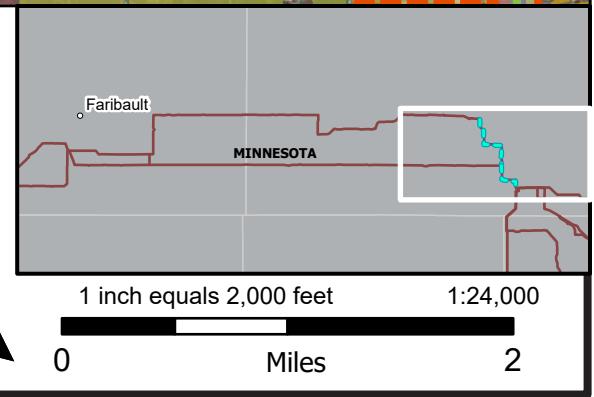
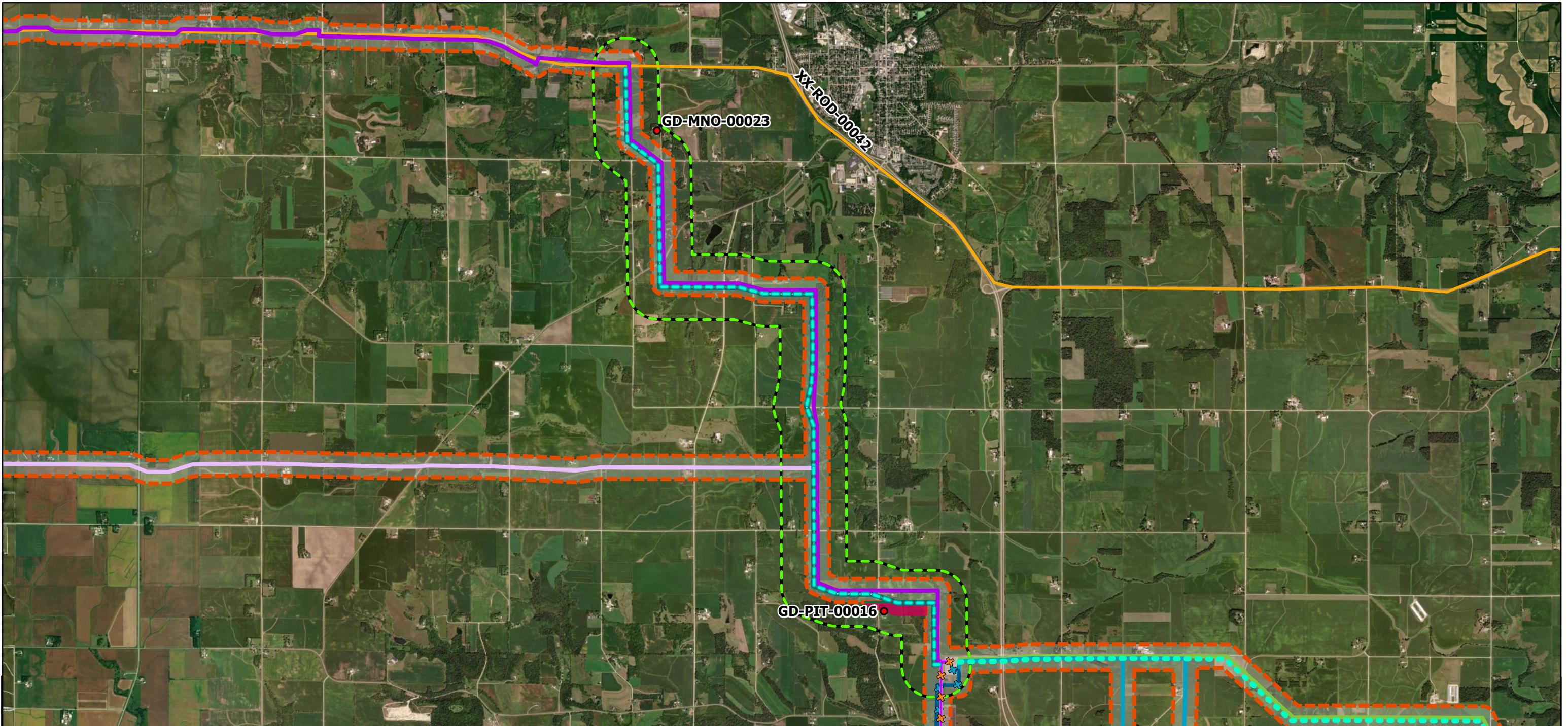


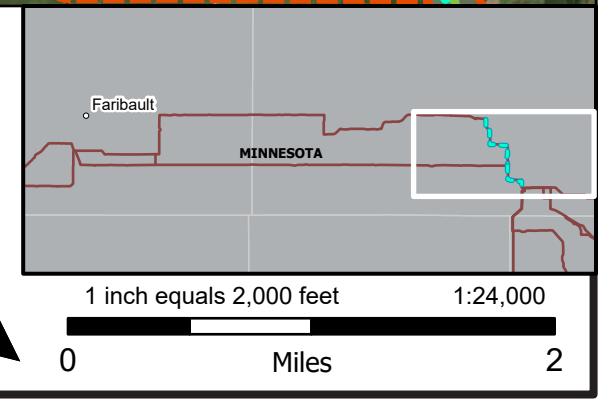
FIGURE 5: CULTURAL RESOURCES

FEB 28TH, 2025

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LEGEND

- Unevaluated for NRHP
- Not Eligible for NRHP
- 0.25-Mile Architectural Buffer
- Proposed Route
- Revision to Route Option 2
- Route Width Expansion Area
- Revision to Route Option 2 Right-of-Way
- Proposed Route Option
- 2 North
- 2 South
- 3
- 4 East
- 4 West
- 4 West - A
- Alternative
- Hwy 14



Imagery Source: NAIP 2023

Table 1. Proximity of Residences to Proposed Centerline

Residence Proximity (ft.)	Route Option 2 North (Application)	Route Option 2 North (New Proposed ROW)	Route Option 2 South (Application)	Route Option 2 South (New Proposed ROW)
0-75	0	0	0	0
76-150	1	0	0	0
151-300	2	0	1	1
301-500	2	3	1	1
Total Residences	5	3	2	2

Table 2. Route Option 2 North: Land Use and ROW

Criteria	New Proposed ROW	Application ROW	Other Information Important to this Request
Number of parcels crossed	34 Parcels	49 Parcels	Fifteen fewer parcels will be crossed compared to the Application.
Number of residences within the right-of-way (ROW)	0	0	No change from Application.
Wetland acreage within the ROW	5.22 acres	4.08 acres	Increase 1.14 acres from Application.
Cultivated Crops acreage within the ROW	99.81 acres	107.25 acres	Reduction of 7.44 acres from Application.
Pasture/Hay acreage within the ROW	13.64 acres	9.27 acres	Increase of 4.37 acres from Application.
Deciduous Forest acreage within the ROW	5.68 acres	1.61 acres	Increase of 4.07 acres from Application.
Mixed Forest acreage within the ROW	1.22 acres	1.39 acres	Minor reduction of 0.17 acres from Application.
Barren Land (Rock/Sand/Clay) acreage within the ROW	0.00 acres	0.55 acres	Minor reduction of 0.55 acres from Application.
Grassland/Herbaceous acreage within the ROW	5.04 acres	7.35 acres	Reduction of 2.31 acres from Application.
Developed land acreage within the ROW	2.89 acres	3.28 acres	Minor reduction of 0.39 acres compared to Application.
Transmission line linear feet across waterbodies or watercourses	Approximately 15 feet	Approximately 15 feet	No change from Application.
Acreage of parks, Wildlife Management Areas, and Waterfowl Production Areas within the ROW	0	0	No change from Application.

Criteria	New Proposed ROW	Application ROW	Other Information Important to this Request
Number of protected or listed species within the ROW	State (0) Federal (5)	State (0) Federal (5)	No change from Application.
Number of archaeological resources within the ROW	0	0	No change from Application.

Table 3. Route Option 2 South: Land Use and ROW

Criteria	New Proposed ROW	Application ROW	Other Information Important to this Request
Number of parcels crossed	15 Parcels	18 Parcels	Three fewer parcels crossed compared to the Application.
Number of residences within the right-of-way (ROW)	0	0	No change from the Application.
Wetland acreage within the ROW	3.35 acres	3.79 acres	Minor reduction of 0.44 acres from the Application.
Cultivated Crops acreage within the ROW	44.08 acres	47.68 acres	Reduction of 3.6 acres from the Application.
Pasture/Hay	0.87 acres	0.55 acres	Minor increase of 0.32 acres from the Application.
Deciduous Forest	3.10 acres	0.59 acres	Increase of 2.51 acres from the Application.
Mixed Forest	1.21 acres	1.05 acres	Minor increase of 0.16 acres from the Application.
Barren Land (Rock/Sand/Clay)	0.00 acres	0.55 acres	Minor reduction of 0.55 acres from the Application.
Grassland/Herbaceous acreage within the ROW	2.17 acres	2.50 acres	Minor decrease of 0.33 acres from the Application.
Developed land	0.75 acres	0.68 acres	Minor increase of 0.07 acres from the Application.
Transmission line linear feet across waterbodies or watercourses	0	0	No change from Application.
Acreage of parks, Wildlife Management Areas, and Waterfowl Production Areas within the ROW	0	0	No change from Application.
Number of protected or listed species within the ROW	State (0) Federal (5)	State (0) Federal (5)	No change from Application.
Number of archaeological resources within the ROW	0	0	No change from Application.

Table 4. Comparison of Resource Impacts of Proposed New ROW for Route Option 2 North

Routing Factor Minn. Rules 7850.1900 subp. 3 and Minn. Rules 7850.4100	Impacts Resulting from Expanded Route Width and Proposed New ROW
Effects on human settlement, including noise and aesthetics	No new residences were identified within the expanded route width. There are two fewer residences located within 500 feet of the revised centerline as compared to the centerline proposed in the Application.
Effects on displacement, cultural values, recreation, and public service	No change from the Application.
Effects on public health and safety	No change from the Application.
Effects on transportation including roadways, railroads, and airports/airstrips	No change from the Application
Effects on land-based economies, including agriculture, forestry, tourism, and mining	Because the requested new ROW would involve placing transmission facilities on this route within agricultural use areas, impacts to agricultural land use will occur. Fewer acres of cultivated land will be crossed by the revised ROW as compared to the ROW proposed in the Application. For the remaining categories, no change is expected in comparison to the Application ROW.
Effects on archaeological and historic resources	The expanded route width and new proposed centerline and ROW would not impact any new archaeological sites or historic properties as compared to the Application, necessitating no change in the impacts or recommendations filed in Application.
Effects on the natural environment, including effects on air quality, water resources, and flora and fauna	An additional freshwater emergent wetland is within the proposed new ROW compared to the Application ROW. Impacts would either be avoided by spanning the wetland or slightly revising the route to avoid this wetland. All other natural environment effects from the proposed new ROW are expected to be similar to those identified in the Application ROW.
Effects on rare and unique natural resources	No change from the Application.
Application of design options that maximize energy efficiencies, mitigate adverse environmental effects, and could accommodate expansion of transmission or generating capacity	No change from the Application.

Routing Factor Minn. Rules 7850.1900 subp. 3 and Minn. Rules 7850.4100	Impacts Resulting from Expanded Route Width and Proposed New ROW
Use or paralleling of existing rights-of-way, survey lines, natural division lines, and agricultural field boundaries	The proposed new ROW will parallel the existing CapX2020 Hampton – North Rochester 345 kV transmission (Line 0964) and replaces the previous proposal to double-circuit with Line 0964. The proposed new ROW will be within 200 feet west of the existing Line 0964 ROW.
Use of existing large electric power generating plant sites	No change from the Application.
Use of existing transportation, pipeline, and electrical transmission systems or rights-of-way	The proposed new ROW will parallel the existing 345 kV line (Line 0964). The proposed new ROW will be within 200 feet west of the existing Line 0964. Some portions of the proposed ROW will be new and outside of the existing ROW.
Electrical system reliability	No change from Application.
Cost of constructing, operation and maintenance based on design and route	Constructing the new 345 kV transmission line adjacent to the existing 345 kV line rather than double-circuiting with the existing line (as proposed in the Application) will be more costly. This is due to an increase in land rights costs and the need to construct new single-circuit poles (v. using existing double-circuit poles with exiting line).
Human and natural environmental effects that cannot be avoided	See above related to impacts to residences. Approximately 82.9 acres of land would be converted to transmission line ROW. Environmental effects are expected to be limited to some additional tree clearing, where applicable, for construction and operation of the Project.
Irreversible and irretrievable commitments of resources	No change from the Application.
Measures that might be implemented to mitigate the potential human and environmental impacts identified above the estimated costs of the mitigative measures	No change from the Application. Same mitigation measures proposed in the Application will be employed.
Wilderness areas: no high voltage transmission line may be routed through state or national wilderness areas (Minn. Rules 7850.4300)	No change from the Application. The requested new ROW and expanded route width are not located within state or national wilderness areas.

Routing Factor Minn. Rules 7850.1900 subp. 3 and Minn. Rules 7850.4100	Impacts Resulting from Expanded Route Width and Proposed New ROW
<p>Parks and Natural Areas: No high voltage transmission line may be routed through state or national parks or state scientific and natural areas unless the transmission line would not materially damage or impair the purpose for which the area was designated, and no feasible and prudent alternative exists. Economic considerations alone do not justify use of these areas for a high voltage transmission line (Minn. Rules 7850.4300)</p>	<p>No change from the Application. The requested new ROW and expanded route width are not located within parks or natural areas.</p>

Table 5. Comparison of Resource Impacts of Proposed New ROW for Route Option 2 South

Routing Factor Minn. Rules 7850.1900 subp. 3 and Minn. Rules 7850.4100	Impacts Resulting from the Proposed Right-of-Way Change
Effects on human settlement, including noise and aesthetics	<p>No new residences were identified within the expanded route width. For Route Option 2 South, there are the same number of residences within 500 feet of the revised centerline as compared to the centerline proposed in the Application.</p>
Effects on displacement, cultural values, recreation, and public service	<p>No change from the Application.</p>
Effects on public health and safety	<p>No change from the Application.</p>
Effects on transportation including roadways, railroads, and airports/airstrips	<p>No change from the Application.</p>
Effects on land-based economies, including agriculture, forestry, tourism, and mining	<p>Because the requested new ROW would involve placing transmission facilities on this route within agricultural use areas, impacts to agricultural land use will occur. Fewer acres of cultivated land will be crossed by the revised ROW as compared to the ROW proposed in the Application. For the remaining categories, no change is expected in comparison to the Application ROW.</p>
Effects on archaeological and historic resources	<p>The expanded route width and new proposed centerline and ROW would not impact any new archaeological sites or historic properties as compared to the Application, necessitating no change in the impacts or recommendations filed in Application.</p>

Routing Factor Minn. Rules 7850.1900 subp. 3 and Minn. Rules 7850.4100	Impacts Resulting from the Proposed Right-of-Way Change
Effects on the natural environment, including effects on air quality, water resources, and flora and fauna	One additional new freshwater emergent wetland is within the proposed new ROW compared to the application ROW. All other natural environment effects from the proposed new ROW are expected to be similar to those identified in the Application.
Effects on rare and unique natural resources	No change from the Application.
Application of design options that maximize energy efficiencies, mitigate adverse environmental effects, and could accommodate expansion of transmission or generating capacity	No change from the Application.
Use or paralleling of existing rights-of-way, survey lines, natural division lines, and agricultural field boundaries	The proposed new ROW will parallel the existing CapX2020 Hampton – North Rochester 345 kV transmission (Line 0964) and replaces the previous proposal to double-circuit with Line 0964. The proposed new ROW will be within 200 feet west of the existing Line 0964 ROW.
Use of existing large electric power generating plant sites	No change from the Application.
Use of existing transportation, pipeline, and electrical transmission systems or rights-of-way	The proposed new ROW will parallel the existing 345 kV Line 0964 Line. The proposed new ROW will be within 200 feet west of the existing Line 0964. Some portions of the proposed ROW will be new and outside of the existing ROW.
Electrical system reliability	No change from Application.
Cost of constructing, operation and maintenance based on design and route	Constructing the new 345 kV transmission line adjacent to the existing 345 kV line rather than double-circuiting with the existing line (as proposed in the Application) will be more costly. This is due to an increase in land rights costs and the need to construct new single-circuit poles (v. using existing double-circuit poles with exiting line).
Human and natural environmental effects that cannot be avoided	See above related to impacts to residences. Approximately 45.4 acres of land would be converted to transmission line ROW. Environmental effects are expected to be limited to some additional tree clearing, where applicable, for construction and operation of the Project.
Irreversible and irretrievable commitments of resources	No change from the Application.

Routing Factor Minn. Rules 7850.1900 subp. 3 and Minn. Rules 7850.4100	Impacts Resulting from the Proposed Right-of-Way Change
Measures that might be implemented to mitigate the potential human and environmental impacts identified above the estimated costs of the mitigative measures	No change from the Application. Same mitigation measures proposed in the Application will be employed.
Wilderness areas: no high voltage transmission line may be routed through state or national wilderness areas (Minn. Rules 7850.4300)	No change from the Application. The requested new ROW and expanded route width are not located within state or national wilderness area.
Parks and Natural Areas: No high voltage transmission line may be routed through state or national parks or state scientific and natural areas unless the transmission line would not materially damage or impair the purpose for which the area was designated, and no feasible and prudent alternative exists. Economic considerations alone do not justify use of these areas for a high voltage transmission line (Minn. Rules 7850.4300)	No change from the Application. The requested new ROW and expanded route width are not located within parks or natural areas.

References

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2025 *Historical Markers in Goodhue County, Minnesota*. Available at <https://www.hmdb.org/results.asp?Search=County&County=Goodhue%20County&State=Minnesota>. Accessed April 1, 2025.

Minnesota Department of Natural Resources.

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National Park Service (NPS)

2025 *National Register of Historic Places*, Public Map. Available at <https://www.nps.gov/maps/full.html?mapId=7ad17cc9-b808-4ff8-a2f9-a99909164466>. Accessed April 1, 2025.

Pope W. R. and S. Fee

1998 *Minnesota Cemetery Locations* (2nd ed.) Minnesota Family Trees, St. Paul.

Terrell, Michelle, and Andrea Vermeer (Pizza)

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Available at https://mn.gov/admin/assets/2011-An-Investigation-of-Unrecorded-Historical-Cemeteries-in-Minnesota_tcm36-187376.pdf. Accessed April 1, 2025

Xcel Energy

2024 APPLICATION FOR A CERTIFICATE OF NEED AND ROUTE PERMIT FOR THE MANKATO – MISSISSIPPI RIVER TRANSMISSION PROJECT, PUC Docket Nos. E002/CN-22-532 E002/TL-23-157. Electronic document. Available at <https://apps.commerce.state.mn.us/eera/web/file-list/15584>. Accessed April 1, 2025.

IN THE MATTER OF THE APPLICATION FOR
A ROUTE PERMIT FOR THE MANKATO TO
MISSISSIPPI RIVER 345 KV TRANSMISSION
PROJECT IN SOUTHEAST MINNESOTA

DOCKET NO: E002/TL-23-157
OAH Docket No. 65-2500-40099

CERTIFICATE OF SERVICE

Gustav Gerhardson certifies that on the 5th day of May, 2025, on behalf of Northern States Power Company, doing business as Xcel Energy, he efiled a true and correct copy of **Request to Expand Route Width** by posting the same on [eDockets](#). Said filing is also served as designated on the attached Service List on file with the Minnesota Public Utilities Commission in the above-referenced docket number.

/s/ Gustav Gerhardson
Gustav Gerhardson

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Katherine	Arnold	katherine.arnold@ag.state.mn.us	Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		No	23-157Official CC Service List	
2	Michael W.	Chase	mwchase_kenyon@yahoo.com	Citizens for Environmental Rights and Safety	6201 480th St. Kenyon MN, 55946 United States	Electronic Service		No	23-157Official CC Service List	
3	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	23-157Official CC Service List	
4	Brent	Dauk	brentdauk@aol.com		140 438th Ave Moose Lake MN, 56063 United States	Electronic Service		No	23-157Official CC Service List	
5	Richard	Davis	richard.davis@state.mn.us	Department of Commerce	85 7th Place East Suite 500 Saint Paul MN, 55101 United States	Electronic Service		No	23-157Official CC Service List	
6	Seth	DeMerritt	seth.demerritt@centerpointenergy.com	CenterPoint Energy Minnesota Gas	505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	23-157Official CC Service List	
7	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	23-157Official CC Service List	
8	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	23-157Official CC Service List	
9	Ellen	Heine	ellen.l.heine@xcelenergy.com	Xcel Energy	414 Nicollet Mall, MP-8 Minneapolis MN, 55401 United States	Electronic Service		No	23-157Official CC Service List	
10	Abigail	Hencheck	ahencheck@mncenter.org	Minnesota Center for Environmental Advocacy	1919 University Ave W Suite 515 St. Paul MN, 55104 United States	Electronic Service		No	23-157Official CC Service List	
11	Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S. Eighth Street Minneapolis MN, 55402	Electronic Service		No	23-157Official CC Service List	

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						United States				
12	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	23-157Official CC Service List
13	Jamie	MacAlister	jamie.macalister@state.mn.us		Department of Commerce	85 7th Place East, Ste. 500 St. Paul MN, 55101 United States	Electronic Service		No	23-157Official CC Service List
14	Ann	O'Reilly	ann.oreilly@state.mn.us		Office of Administrative Hearings	PO Box 64620 St. Paul MN, 55101 United States	Electronic Service		Yes	23-157Official CC Service List
15	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	23-157Official CC Service List
16	Cezar	Panait	cezar.panait@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	23-157Official CC Service List
17	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	23-157Official CC Service List
18	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		No	23-157Official CC Service List
19	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	23-157Official CC Service List
20	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	23-157Official CC Service List
21	Jeffrey	Small	jsmall@misoenergy.org			MISO P.O. Box 4202 Carmel IN, 46082-4202 United States	Electronic Service		No	23-157Official CC Service List
22	Lauren	Steinhaeuser	lauren.steinhaeuser@xcelenergy.com	Northern States Power		414 Nicollet Mall, 401-08 Minneapolis	Electronic Service		No	23-157Official CC

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Company dba Xcel Energy		MN, 55401 United States				Service List
23	Emily	Suppes	emily.suppes@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service	No	23-157Official CC Service List	
24	Amelia	Vohs	avohs@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 St. Paul MN, 55104 United States	Electronic Service	No	23-157Official CC Service List	