



414 Nicollet Mall
Minneapolis, MN 55401

July 14, 2026

Sam Weaver
Environmental Review Manager
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 550101

Re: Response to Scoping Comments

In the Matter of the Application of Xcel Energy and Echo Zone LLC for a Route Permit for the North Rochester to Skyway High Voltage Transmission Line Project in Goodhue County, Minnesota
MPUC Docket No. E002/TL-26-135

Dear Mr. Weaver:

Northern States Power Company, doing business as Xcel Energy (Xcel Energy or the Company), and Echo Zone LLC, a subsidiary of Google LLC (collectively, the Applicants) respectfully submit this response to the comments submitted prior to the June 26, 2026 deadline for comments on the need for an addendum to the Environmental Assessment (EA) for the North Rochester to Skyway 345 kV Transmission Line Project (Project).

The Project consists of a new, approximately 1.2-mile, double-circuit, 345 kV transmission line that will connect Xcel Energy's existing North Rochester Substation to new substation facilities located at the proposed Project Skyway development site near the city of Pine Island. The Project is needed to provide electric service to a proposed Google data center currently under development.

The Applicants appreciate the participation and comments from tribes, state agencies, local government units, and the public during the scoping process. Many of the comments received concern Google's proposed data center, the environmental review for the data center and its backup generation, and the terms of the Electric

Service Agreement and Interconnection Agreement (together, the Agreements) between Xcel Energy and Google.¹

A number of these issues will be addressed in separate proceedings and are therefore not addressed here. With respect to the backup generation facilities, Google is currently engaged in pre-application coordination with the Minnesota Pollution Control Agency (MPCA) related to air permitting for these generators. There will be additional opportunities for the public to comment on environmental review for backup generators as part of any MPCA permitting process for these backup generators.² Additionally, the Agreements between Xcel Energy and Google are currently under review by the Minnesota Public Utilities Commission (Commission) in a separate proceeding (Docket No. E002/M-26-170). Further information regarding the Agreements, as well as information about submitting comments about the Agreements, can be found in that docket.

This response addresses comments related to the scope of the EA addendum for the Project and the Commission's determination regarding whether preparation of an EA addendum is warranted.

A. Minnesota Department of Natural Resources

The Minnesota Department of Natural Resources (MnDNR) filed comments on June 26, 2026.³ In its comments the MnDNR recommended that the Route Permit for the Project include conditions related to: (1) lighting; (2) vegetation clearing timing; (3) avian flight diverters; (4) wildlife-friendly erosion control; and (5) dust control. The MnDNR also noted that Project may require a MnDNR Water Appropriation Permit. The Applicants will obtain all necessary permits and approvals prior to construction of the Project, including a MnDNR Water Appropriation Permit, if required.

¹ See e.g., Oral Comments from Public Information and Scoping Meetings (June 29, 2026) (eDocket No. [20266-233459-02](#)); Public Comment (Cory Mines) (June 25, 2026) (eDocket No. [20266-233311-01](#)).

² The environmental review conducted by the MPCA is separate from the environmental review conducted by the City of Pine Island for the data center itself.

³ Minnesota Department of Natural Resources Comments (June 26, 2026) (eDocket No. [20266-23341-01](#)) (hereinafter, MnDNR Comments).

Substation Lighting

The MnDNR recommended a permit condition requiring the use of downward lighting, shielded lighting, and nominal color temperatures below 2700K to minimize blue hue and reduce harm to birds, insects, and other animals.⁴ The MnDNR also recommends that all non-essential lighting be turned off from midnight to dawn from March 15 -May 31 and August 15 to October 31 during the Mayfly hatch and following the recommendations of the Audubon Society's Lights Out Program.

The Applicants have no objection to a proposed condition related to the use of downward lighting and lighting to minimize blue hue and note that such a condition is already included in the sample route permit issued by the Commission on July 2, 2026.⁵ Regarding the condition requiring non-essential lighting to be turned off during specific times of the year, Applicants have no objection to such a condition so long as it does not conflict with any applicable North American Electric Reliability Corporation, National Electric Safety Code, and other applicable safety and security requirements.

Vegetation Clearing Timing

The MnDNR recommended a special permit condition requiring the Applicants to avoid tree removal from June 1 through August 15 to minimize impacts to some bird and bat species, including the federally endangered northern long-eared bat.⁶ The Applicants have no objection to the proposed condition so long as it includes the phrase "to the extent practicable" as there may be limited circumstances when the Applicants will need to conduct tree removals during the June 1 to August 15 timeframe.

Avian Flight Diverters, Wildlife-Friendly Erosion Control, and Dust Control

The MnDNR recommended a permit condition requiring the Applicants to coordinate with the MnDNR on appropriate locations for avian flight diverters after the route is finalized.⁷ The MnDNR also recommended a permit condition requiring

⁴ MnDNR Comments at 1.

⁵ Sample HVTTL Permit at Section 5.3.22 (July 2, 2026) (eDocket No. [20267-233731-01](#)) (hereinafter Sample HVTTL Permit).

⁶ MnDNR Comments at 2.

⁷ MnDNR Comments at 2.

that erosion control blankets be limited to “bio-netting” or “natural netting” types.⁸ In addition, the MnDNR recommended a condition requiring Applicants to avoid using dust control products containing calcium chloride or magnesium chloride.⁹ The Applicants have no objection to these proposed conditions and note that they are already included in the sample route permit issued by the Commission on July 2, 2026.¹⁰

B. Minnesota Department of Transportation

In comments filed on June 25, 2026, the Minnesota Department of Transportation (MnDOT) noted that in the stretch of U.S. Highway 52 (US 52) that the Project area covers, MnDOT sponsors the Monarch Nationwide Candidate Conservation Agreement Adopted Areas and may also contain vegetation of concern. MnDOT further noted that roadway improvements may be planned for this segment of US 52 in the Project area.¹¹ In light of these considerations, MnDOT encouraged the Applicants to continue coordinating with MnDOT regarding the Project planning and construction activities affecting the US 52 corridor which the Applicants plan to do.

MnDOT’s comments also included, as an attachment, the comments and recommendations from MnDOT’s Office of Environmental Stewardship. Many of these comments relate matters that would be addressed through MnDOT permitting process or through other applicable federal and state permitting requirements.¹² The Applicants will continue to coordinate with MnDOT and other federal and state agencies and will obtain all required permits and approvals necessary for construction and operation of the Project.

C. Goodhue Soil & Water Conservation District

On June 11, 2026, the Goodhue Soil & Water Conservation District filed comments noting the existence of a wetland within and to the east of the North Rochester Substation expansion area and requesting that the Applicants comply with the Minnesota Wetland Conservation Act.¹³ The Applicants will comply with the

⁸ MnDNR Comments at 2.

⁹ MnDNR Comments at 2.

¹⁰ Sample HVTL Permit at Sections 5.3.16, 5.3.24, and 5.3.23.

¹¹ Minnesota Department of Transportation Comments (June 25, 2026) (eDocket No. [20266-233304-01](#)) (hereinafter, MnDOT Comments).

¹² MnDOT Comments at Attachment 1.

¹³ Goodhue Soil & Water Conservation District (June 11, 2026) (eDocket No. [20266-232779-01](#)).

Minnesota Wetland Conservation Act and the sample route permit issued by the Commission on July 2, 2026 includes a specific condition to minimize the Project's potential impacts to wetlands and water resources.¹⁴

D. Public Comments

As noted above, many of the comments received during the scoping process relate to matters unrelated to the need for an EA addendum for the Project. As result, the Applicants limit their response here to those comments related to the Project and the need for an EA addendum.

On June 2, 2026, Carol Overland (Ms. Overland) filed comments addressing several aspects of the Project.¹⁵ First, Ms. Overland questions whether there is a connection between the proposed Project and the 765 kV transmission line projects that are being developed in the area as part of the Midcontinent Independent System Operator, Inc. (MISO) Tranche 2.1 portfolio of projects. However, the need for the Tranche 2.1 projects was evaluated by MISO using demand forecasts developed in 2023, which did not include the proposed Google data center. Accordingly, the need for the MISO Tranche 2.1 projects was identified independently of the Google data center and the proposed Project.

Ms. Overland also seeks clarification about the number of 345 kV transmission lines that are proposed as part of this Project. As noted in the Application, the Project includes a double-circuit 345 kV transmission line or two 345 kV transmission lines that will be located on a single transmission structure.¹⁶

Ms. Overland expressed concern about road construction along US 52 and the potential for that construction to affect the Project. As discussed above, MnDOT submitted comments noting anticipated road construction projects within the Project area. The Applicants are aware of these planned improvements, and they were already evaluated in the EA.¹⁷ The Applicants will continue to coordinate with MnDOT

¹⁴ Sample HVTL Permit at Section 5.3.9.

¹⁵ Overland Comments at 1 (June 2, 2026) (eDocket No. [20266-232469-01](#)).

¹⁶ Route Permit Application and Appendices A-G at Sections 2.0 and 2.2.4 (April 28, 2026) (eDocket No. [20264-231087-02](#)) (hereinafter, Application).

¹⁷ Application at 115-116.

regarding Project planning, construction, and any potential interactions with future MnDOT work along the US 52 corridor.

Another commenter expressed concern about the impacts of the Project and its construction on nearby residences.¹⁸ The EA provided an evaluation of potential impacts to residences and also included a discussion of mitigation measures that may be employed to minimize these impacts.¹⁹

Other commenters expressed concerns about agricultural impacts, mitigation measures, and restoration of agricultural areas.²⁰ The EA evaluated each of these items²¹ and the sample route permit also includes a number of conditions that will provide additional protections for agricultural lands.²²

One commenter noted that section 6.10.2 of the EA described the proposed Google Project Skyway data center as a “single data center” on “about 88 acres, with an approximately 2,850,000 square-foot data center building.”²³ The commenter states that the City of Pine Island has received development plans for two 30,000 square foot buildings, one data center building and one office building. As explained in the EA, Project Skyway refers to an area encompassing approximately 482 acres located east of the North Rochester Substation and within the Project Area.²⁴ At present, Google has executed a lease for a single data center building. The Applicants will provide updated information regarding the Project Skyway development if additional details become available during this proceeding.

E. Conclusion

The Applicants appreciate the opportunity to provide these comments in response to the comments received related to the need for an EA addendum for the Project. Based on the comments received, the Applicants do not believe there is a need

¹⁸ Public Comment (Tim and Jessica Tapani) (July 8, 2026) (eDocket No. [20267-233908-01](#)).

¹⁹ Application at 38-39.

²⁰ Public Comment (Aubree Derksen) (July 8, 2026) (eDocket No. [20267-233898-01](#)); Public Comment (Cory Mines) (June 25, 2026) (eDocket No. [20266-233311-01](#)).

²¹ Application at 75-80 and Appendix G.

²² See e.g., Sample HVTL Permit at Sections 5.3.11, 5.3.17, and 5.3.18.

²³ Public Comment (Nicole Mills) (July 8, 2026) (eDocket No. [20267-233934-02](#)).

²⁴ Application at 115.

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for an EA addendum for this Project. Please contact me at ellen.l.heine@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/ Ellen Heine

ELLEN HEINE
PRINCIPAL SITING AND PERMITTING AGENT
NORTHERN STATES POWER COMPANY

cc: Service List

IN THE MATTER OF THE APPLICATION
FOR A ROUTE PERMIT FOR NORTH
ROCHESTER TO SKYWAY HIGH
VOLTAGE TRANSMISSION LINE
PROJECT

Docket No. E002/TL-26-135

CERTIFICATE OF SERVICE

Gustav Gerhardson certifies that on the 14th day of July 2026, on behalf of Northern States Power Company, doing business as Xcel Energy, and Echo Zone LLC, a subsidiary of Google LLC, he filed a true and correct copy of the **Response to Scoping Comments** via [eDockets](#). Said document was also served via electronic service or U.S. Mail as designated on the attached Official Service List on file with the Minnesota Public Utilities Commission in the above-referenced docket.

/s/ Gustav Gerhardson
Gustav Gerhardson

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
10	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	26-135 Official
11	Shantal	Pai	spai@fredlaw.com	Fredrikson & Byron, PA		60 S 6th Street, Minneapolis, MN 55407 Minneapolis MN, 55417-1208 United States	Electronic Service		No	26-135 Official
12	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	26-135 Official
13	Lauren	Steinhaeuser	lauren.steinhaeuser@xcelenergy.com	Northern States Power Company dba Xcel Energy		414 Nicollet Mall, 401-08 Minneapolis MN, 55401 United States	Electronic Service		No	26-135 Official