MINNESOTA
PUBLIC UTILITIES COMMISSION

Staff Briefing Papers

Meeting Date	February 5, 2026		**Agenda Item ***8**
Company	Northern States Power Company d/b/a Xcel Energy		
Docket No.	E002/CN-22-532, TL-23-157		
	In the Matter of the Application of Xcel Energy for a Certificate of Need and Route Permit for the Mankato – Mississippi 345 kV Transmission Line Project in Southeast Minnesota		
Issues	• Should the Commission adopt the administrative law judge's findings of fact, conclusions of law, and recommendation? • Should the Commission determine that the environmental impact statement is adequate? • Should the Commission grant a certificate of need for Xcel Energy's Mankato to Mississippi River 345 kV Transmission Line Project? • Should the Commission issue a route permit for Xcel Energy's Mankato to Mississippi River 345 kV Transmission Line Project?		
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✓ **Relevant Documents**	**Date**
Order Approving Notice Plan Petition and Approving Exemptions from Certain Certificate of Need Application Content Requirements (CN-22-532)	12/12/2023
Xcel Energy Initial Filing (20 parts, Docket# 22-532, 23-157)	04/02/2024
Xcel Energy Supplemental Comments (both dockets)	05/06/2024

✓ **Relevant Documents**	**Date**
Sample High-Voltage Transmission Line Route Permit (23-157)	05/22/2024
Order Accepting Application as Complete and Establishing Procedural Requirements (both dockets)	06/26/2024
MN DNR Comments (23-157)	07/31/2024
MnDOT Comments (23-157)	08/01/2024
Order Adding Alternative to Scope of Environmental Impact Statement (both dockets)	10/09/2024
DOC EERA Environmental Impact Statement Scoping Decision (12 parts, both dockets)	12/02/2024
DOC EERA Notice of Environmental Assessment Scoping Decision	12/11/2024
Clean Energy Organizations – Petition for Intervention (2 parts, both dockets)	12/23/2024
CAH Order Granting Petition to Intervene (both dockets)	01/03/2025
Overland, Legalectric, NoCapX 2020 – Comments (both dockets)	03/10/2025
MnDOT Comments (23-157)	03/10/2025
MISO Comments (22-532)	03/28/2025
DOC DER Comments (22-532)	03/28/2025
Xcel Energy Initial Comments on Merits of the CN Application (22-532)	03/28/2025
Joint Commenters - Initial Comments (22-532)	03/28/2025
The Prehn Family and NoCapX 2020 – Initial Comments (22-532)	03/28/2025
Xcel Energy Direct Testimony (3 parts) (23-157)	03/28/2025
The Prehn Family and NoCapX 2020 – Supplement to Initial Comments (22-532)	04/01/2025
MISO Comments (22-532)	04/25/2025
Xcel Energy Reply Comments (22-532)	04/25/2025
The Prehn Family and NoCapX 2020 Reply Comments (22-532)	04/25/2025
DOC EERA Draft EIS (35 parts, both dockets)	05/05/2025
Xcel Energy – Request to Expand Route Width (23-157)	05/05/2025
The Prehn Family and NoCapX 2020 Comments (23-157)	05/12/2025
Xcel Energy Rebuttal Testimony of Ellen Heine (23-157)	05/12/2025
Xcel Energy Letter Re: Mailed Notice of Scoping Decision (both dockets)	05/13/2025
The Prehn Family and NoCapX 2020 Comments (23-157)	05/14/2025
Commission Notice to Newly Affected Landowners	05/16/2025

✓ **Relevant Documents**	**Date**
Xcel Energy Surrebuttal Testimony of T. Wendland (23-157)	05/19/2025
Xcel Energy - Exhibits - Hearing (Maps of Xcel Energy's Preferred Route) (23-157)	05/30/2025
Xcel Energy Comments on Draft EIS (23-157)	06/10/2025
The Prehn Family and NoCapX 2020 Comments on Draft EIF and Final Comments (7 parts, 23-157)	06/10/2025
Minnesota Interagency Vegetation Management Planning Working Group Hearing Comments (23-157)	06/10/2025
MnDOT Comments (both dockets)	06/10/2025
MN DNR Comment Letter and Attachments (4 parts)	06/10/2025
Shaddix & Associates Public Hearing Transcripts and Exhibits (11 parts, both dockets)	06/30/2025
PUC EIP – FEIS (50 parts)	07/24/2025
PUC EIP – FEIS Maps (75 parts)	07/25/2025
PUC EIP Notice of FEIS Availability and Comment Period	07/25/2025
Xcel Energy Post-Hearing Brief (23-157)	08/01/2025
Xcel Energy Proposed Findings of Fact, Conclusions of Law, and Recommendations (23-157)	08/01/2025
Xcel Energy Reply to Public Comments (23-157)	08/01/2025
PUC EIP Proposed Revisions to Findings of Fact, Conclusions, and Recommendations (both dockets)	08/15/2025
CAH Report – Findings of Fact, Conclusions of Law, and Recommendations (both dockets)	10/30/2025
Xcel Energy – Exceptions to the ALJ Report (23-157)	11/14/2025
PUC EIP – Exceptions to the ALJ Report (both dockets)	11/17/2025

Attachment A – Xcel Energy Exceptions Table
Attachment B – Draft Route Permit
Attachment C – Draft Route Maps
Attachment D – Detailed Route Maps Table

ISSUES

- Should the Commission adopt the administrative law judge's findings of fact, conclusions of law, and recommendation?
- Should the Commission determine that the environmental impact statement is adequate?
- Should the Commission grant a certificate of need for Xcel Energy's Mankato to Mississippi River transmission Line Project?
- Should the Commission grant a route permit for Xcel Energy's Mankato to Mississippi River transmission Line Project?

PROJECT BACKGROUND

On April 2, 2024, Northern States Power Co., d/b/a Xcel Energy (Xcel Energy) applied to the Minnesota Public Utilities Commission (Commission) for a certificate of need and route permit to construct the Mankato to Mississippi River 345-kilovolt (kV) Transmission Line (MMRT Project), a new approximately 130-mile 345 kV transmission line between the Wilmarth Substation in Mankato, Minnesota and the Mississippi River near Kellogg, MN and a new, approximately 20-mile 161 kV transmission line between the North Rochester Substation near Pine Island, Minnesota and an existing transmission line northeast of Rochester, Minnesota. The MMRT Project may cross portions of Blue Earth, Le Sueur, Waseca, Rice, Dodge, Olmstead, Goodhue, Winona, and Wabasha counties and is divided into the four segments described below:

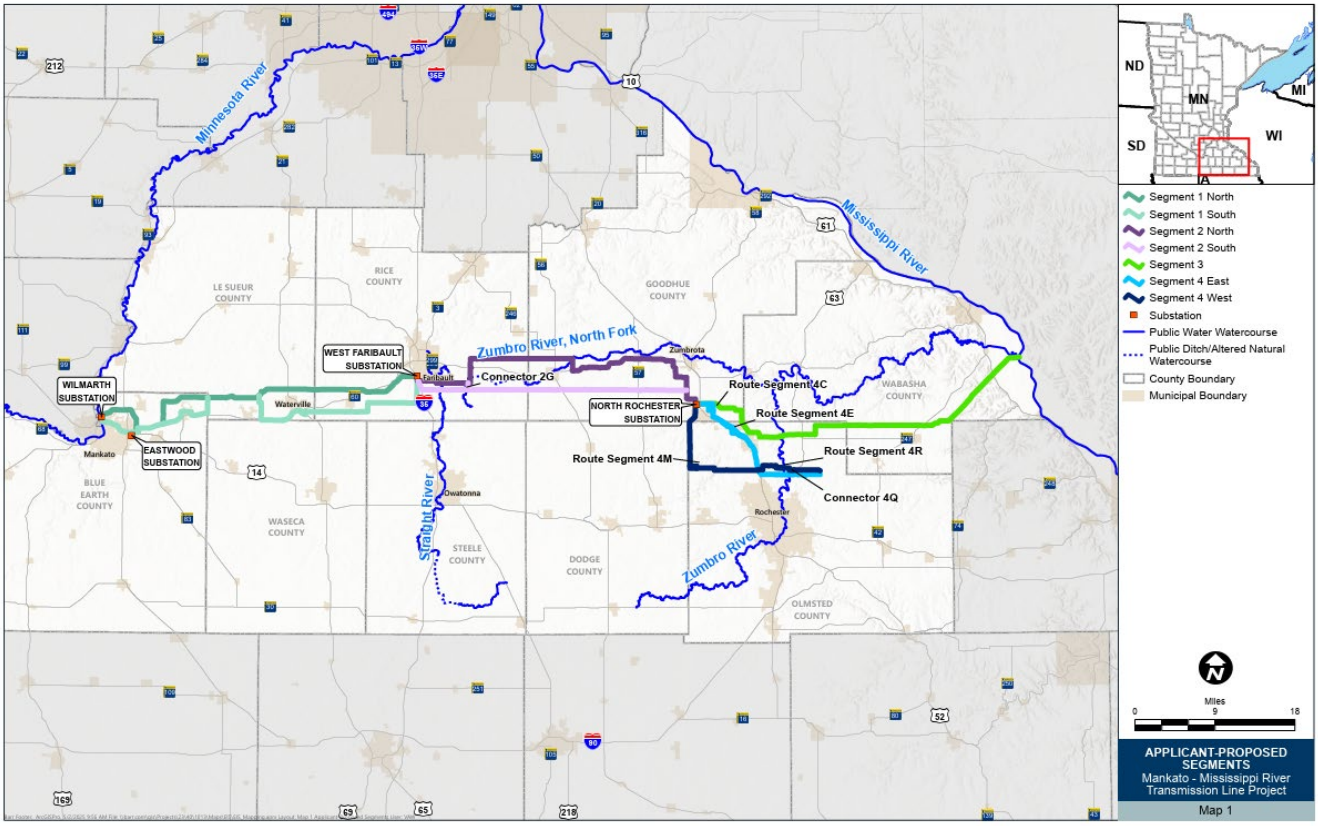
- Segment 1: a new 48- to 54-mile 345-kV transmission line between the Wilmarth Substation and a point near the West Faribault Substation;
- Segment 2: a new 34- to 42-mile 345-kV transmission line from a point near the existing West Faribault Substation to the existing North Rochester Substation;
- Segment 3: conversion of 27 miles of existing 161/345-kV transmission line to 345/345-kV operation and installation of a new 16-mile 345-kV circuit on the existing 345/345-kV double-circuit capable structures between the existing North Rochester Substation and the Mississippi River; and
- Segment 4: a new 19.6-to 23.7-mile 161-kV transmission line between the existing North Rochester Substation and the existing 161-kV Chester Line northeast of Rochester.

Xcel Energy requested a route width of 1,000 feet along most of the proposed alignments (500 feet to either side of proposed centerlines), with wider areas (up to 1.25 miles wide) around MMRT Project substations, locations with routing constraints, and where route options come together. The 345 kV portion of the MMRT Project typically requires a permanent 150-foot-wide right-of-way. For the 161 kV portions of the Project, a 100-foot-wide right-of-way is typically required.

Xcel Energy indicated that the MMRT Project, known as LRTP4, along with other Long Range Transmission Projects (LRTP) that were studied and approved by the Midcontinent Independent

System Operator, Inc. (MISO) and are needed to provide reliable, resilient, and cost-effective delivery of energy as the generation resource mix continues to evolve over the coming years. Specifically, the MMRT Project and the other LRTP projects in Wisconsin[1] are needed to address loading and congestion issues on the existing 345 kV transmission system across southern Minnesota and Wisconsin.

Project Overview Map



RULES AND STATUTES

A. Certificate of Need

The Commission must first issue a certificate of need before a large energy facility may be sited or constructed in Minnesota.[2] The proposed MMRT Project requires a certificate of need because it meets the definition of a large energy facility, as it is a transmission line with a capacity greater than 300 kV and greater than one mile in length.[3]

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[1] Tremval - Eau Claire - Jump River and Tremval - Rocky Run - Columbia transmission projects both located in Wisconsin.

[2] Minn. Stat. § 216B.243, subd. 2

[3] Minn. Stat. § 216B.2421, subd. 2(2)

In assessing the need for a proposed large energy facility, the Commission must consider the factors listed under each of the criteria set forth in Minn. Stat. § 216B.243, subd. 3, and Minn. R. 7849.0120.

B. Route Permit

The Commission must issue a route permit before a high-voltage transmission line may be constructed in Minnesota.[4] The proposed MMRT Project requires a route permit because it meets the definition of a high-voltage transmission line, and is a conductor of electric energy and associated facilities designated for and capable of operation at a nominal voltage of 100 kilovolts or more and is greater than 1,500 feet in length.[5]

In deciding whether to issue a route permit for a high-voltage transmission line the Commission must consider the factors under Minn. R. 7850.1400.

C. Environmental Impact Statement

Minn. R. 7850.2500 requires that an environmental impact statement (EIS) be developed for a high-voltage transmission line as defined under Minn. Stat. § 216E.01, subd. 4. The EIS must provide information on the human and environmental impacts of the proposed high-voltage transmission line and of alternative routes including methods to mitigate identified impacts. The Commission shall not make a final decision on a route permit until it has found the EIS to be adequate. The final EIS is adequate if it:

- addresses the issues and alternatives raised in scoping to a reasonable extent considering the availability of information and the time limitations for considering the permit application;
- provides responses to the timely substantive comments received during the draft environmental impact statement review process; and
- was prepared in compliance with the procedures in parts 7850.1000 to 7850.2700.

D. Procedural Treatment of Application

The Commission authorized the following procedures for reviewing the certificate of need and route permit application:

- Review of the certificate of need application through the informal review process.[6]

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[4] Minn. Stat. § 216E.03, subd. 2
[5] Minn. Stat. § 216E.01, subd. 4
[6] Minn. R. 7829.1200

- Review of the route permit application through the full review process, which requires the preparation of an EIS and a contested case hearing conducted by an administrative law judge pursuant to Minnesota Statutes, chapter 14.[7]
- Joint meetings and hearings, as well as combined environmental review of the certificate of need and route permit applications, including the preparation of an EIS that includes the requirements of an environmental report for a certificate of need.[8]

PROCEDURAL HISTORY

On December 12, 2023, in response to a Notice Plan Petition and a Request for Exemption from Certain Certificate of Need Application Content Requirements filed by Xcel Energy, the Commission issued an order that approved the proposed notice plan and authorized certain exemptions from the data requirements.

On April 2, 2024, Xcel Energy filed a joint certificate of need and route permit application for the MMRT Project.

On May 6, 2024, Xcel Energy filled supplemental comments.

On June 26, 2024, the Commission issued an *Order Accepting Applications as Complete, Establishing Procedural Requirements and Notice and Order for Hearing*. The Order approved joint proceedings, combined environmental review and denied the request to establish an advisory task force. The Commission also referred the matter to the Court of Administrative Hearings (CAH), recommending joint draft EIS public meetings and public hearings.

Between July 8 and July 10, 2024, Public Information and EIS Scoping Meetings were held in each of the following cities: Mankato, Waterville, Faribault, Pine Island, and Kellogg. Two online public information and EIS scoping meetings were held on July 11, 2024. A written comment period was open through August 1, 2024, to receive comments on the scope of the EIS.

On September 9, 2024, CAH issued an Order Granting Petition to Intervene by *NoCapX 2020 and the Prehn Family*.

On October 9, 2024, the Commission issued an *Order Adding Alternative to Scope of Environmental Impact Statement*. The Order adopted the recommendations of the Minnesota Department of Commerce Energy Environmental Review and Analysis Unit (DOC

[7] Minn. Stat. § 216E.03 and Minn. R. 7850.1700 to 7850.2700
[8] Minn. R. 7849.1900, subp. 1

EERA) as outlined in its Comments and Recommendations on the EIS Scoping Decision dated September 19, 2024 and also approved a route expansion for Segment 9 to be included in the scope of the EIS.

On December 2, 2024, DOC EERA filed its Environmental Impact Statement Scoping Decision.

On January 3, 2025, CAH issued an *Order Granting Petition to Intervene by the Clean Energy Organizations* (the Minnesota Center for Environmental Advocacy (MCEA), Fresh Energy, and Clean Grid Alliance, collectively the Clean Energy Organizations or CEOs).

On January 10, 2025, the Commission issued a Notice of Comment Period on the Merits of the Certificate of Need Application. The notice identified an initial comment deadline of March 28, 2025, and a reply comment deadline of April 25, 2025.

By March 28, 2025, initial comments on the certificate of need application were filed by Xcel Energy, the Minnesota Department of Commerce Division of Energy Resources (DOC DER), Overland-Legalectric-NoCapX 2020, Midcontinent Independent System Operator, Inc. (MISO), and the Joint Intervenors (Clean Grid Alliance, Minnesota Center for Environmental Advocacy, Fresh Energy, Sierra Club, Clean Energy Economy Minnesota, Center for Rural Affairs, Union of Concerned Scientists, the National Audubon Society, and the Citizens Utility Board of Minnesota),and the Prehn Family and NoCapX 2020.

On March 28, 2025, Xcel Energy submitted direct testimony of Ellen Heine and Tony Wendland.

By April 25, 2025, reply comments on the certificate of need application were filed by Xcel Energy, the Prehn Family and NoCapX 2020, and MISO.

On May 5, 2025, Xcel Energy filed a 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.

Also, on May 5, 2025, DOC EERA filed the Draft EIS.

On May 12, 2025, Xcel Energy filed the rebuttal testimony and schedules of Ellen Heine.

On May 12, 2025, the Prehn Family and NoCapX 2020 filed a comment pointing to the lack of notice to 1,341 newly affected landowners during the EIS scoping decision notice that was sent by DOC EERA in December 2024.

On May 13, 2025, Xcel Energy filed a letter describing the company's notice of scoping decision that was mailed to landowners with property located either on one of the newly added route or alignment alternatives or on one of the routes originally proposed in the Route Permit

application, including the 1,341 newly affected landowners that were inadvertently not sent the DOC-EERA's New Landowner Full Packet (e-filed on 12/11/2024).

On May 19, 2025, Xcel Energy filed the surrebuttal testimony of Tony Wendland.

Between May 27 and May 30, 2025, Administrative Law Judge (ALJ) Ann O'Reilly presided over Informational Meetings, Public and Evidentiary Hearings to receive public input on the Draft EIS and certificate of need and route permit applications. The meetings and hearings included one online via WebEx, and five in-person gatherings in: Mankato, Waterville, Owatonna, Zumbrota, and Faribault, and an evidentiary hearing in the Commission's Large Hearing Room. The in-person public meetings and hearings each included an open house period to provide information on the project and the Draft EIS. In addition, a written comment period was open through June 10, 2025.

On May 30, 2025, Xcel Energy filed Exhibit 36 – Maps of the applicant's preferred route.

On June 10, 2025, Xcel Energy filed comments on the Draft EIS.

On June 10, 2025, the Prehn Family and NoCapX 2020 filed comments on Draft EIS, public comments on the merits of the CN Application, and public comments on the merits of the route permit application. The Prehn Family and NoCapX 2020 also refiled comments filed previously (July 29, 2024, March 28, 2025, May 12, 2025, May 14, 2025), and information requests and responses from DOC EERA and Xcel Energy on the combined landowner mailing list.

On July 24 and 25, 2025, PUC EIP filed the Final EIS, including detailed maps.

On August 1, 2025, Xcel Energy filed a Post-Hearing Brief, Proposed Findings of Fact, Conclusions of Law, and Recommendations, and a response to public comments.

On August 15, 2025, PUC EIP filed Proposed Revisions to the applicant's Findings of Fact, Conclusions of Law, and Recommendations.

On October 30, 2025, ALJ Ann O-Reilley filed the Findings of Fact, Conclusions of Law, and Recommendations (ALJ Report).

On November 14, 2025, Xcel Energy submitted exceptions to the ALJ Report.

On November 17, 2025, PUC EIP submitted exceptions to the ALJ Report.

CERTIFICATE OF NEED APPLICATION

As previously noted, the MMRT Project is a result of MISO's Long Range Transmission Projects planning that were studied and approved by MISO to avoid the potential of numerous existing transmission facilities from overloading above safe operating levels or below adequate voltage

levels. MISO determined that the Mankato to Mississippi Project would provide reliable, resilient, and cost-effective delivery of energy as the generation resource mix continues to evolve over the coming years. According to Xcel, during periods when there is high renewable generation output in southwestern Minnesota and northwestern Iowa, there are overloads on several 345 kV transmission lines and substation transformers in southern Minnesota. The Project will provide additional transmission capacity to relieve these overloads. This Project also strengthens existing generation outlet towards load centers in Wisconsin and areas to the south. Additional benefits of the Project include reduced congestion, reduced thermal loading, and improved transfer voltage stability.

The Commission, in its June 26, 2024, *Order Accepting Applications as Complete and Establishing Procedural Requirements* authorized the review of the certificate of need application using the informal process.[9]

E. Commenter Positions Concerning Certificate of Need

The Commission authorized informal review of the certificate of need application, also referred to as the comment and reply process. A notice of comment on the merits of the certificate of need application was issued by the Commission on January 10, 2025, requesting initial and reply comments over a period of 15 weeks. In addition, joint public hearings on the certificate of need and route permit applications were held, including a written comment period.

The Commission received initial comments on the certificate of need application from Xcel Energy, MISO, DOC DER, the Joint Commenters, Overland-Legalectric-NoCapX 2020, and the Prehn Family, CFERS, LLC, and reply comments from Xcel Energy, the Prehn Family and NoCapX 2020, and MISO.

On May 6, 2024, the Applicant filed supplemental completeness comments responding to NoCapX 2020 and the Prehn Family, the City and Mayor of Oronoco, and commenters in the Certificate of Need proceeding.[10] The Applicant reiterated its prior recommendations.

Staff provides brief summaries of the commenters' positions below. However, it is recommended that the Commission review the specific comment letters for more detailed information.

1. DOC DER Comments

DOC DER recommended that the Commission grant a certificate of need for the MMRT Project after considering the impacts detailed in the EIS and if the impacts are found acceptable.

a. Statutory Criteria

[9] Commission Order Accepting Applications as Complete, June 26, 2024

[10] Xcel Energy Supplemental Comments, May 6, 2024

A brief summary of DOC DER's conclusions regarding the rule criteria outlined in chapter 7849.0120, involving certificate of need determinations, is provided below.[11]

Concerning Minn. R. 7849.0120 A[12] and its subparts, DOC DER concluded:

- The Department concluded that the MISO Futures that were used to analyze the demand and energy forecast for Xcel Energy for the next twenty years reasonably encompass the future demand and energy requirements of the utilities' customers. Also, the Department concluded that the MISO Futures reasonably encompass the future generation additions necessary to serve the utilities' customers.
- The Department found evidence that supports Xcel Energy's Petition's satisfaction of Minnesota Rules 7849.0120 A (2). The proposed project will improve congestion and reliability, rather than address peak demand. Second, the effects of expected energy efficiency (EE) (built into the forecasts) and new EE (as expansion units) programs are built into the MISO resource planning model (EGEAS).
- Promotional practices of Xcel have not created the reliability issues to be addressed by the proposed Project.
- Current facilities and planned facilities not requiring certificates of need have been considered and will not be able to meet the future demand.
- The proposed Project will make efficient use of resources.

Concerning Minn. R. 7849.0120 B[13] and its subparts, DOC DER concluded:

- The proposed project using 345 kV on Segments 1 through 3 with 161 kV relocation on Segment 4 is not excessive and therefore is reasonable compared to other alternatives (e.g., different voltage transmission lines, high-voltage direct current lines).
- The size, the type, and the timing of the proposed Project is reasonable when compared to those of the available alternatives.
- There is no reasonable alternative or combination of alternatives that would be more reasonable and prudent.

Concerning Minn. R. 7849.0120 C[14] and its subparts, DOC DER concluded:

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[11] DOC DER Comments, March 28, 2025

[12] Minn. R. 7849.0120 A: The probable result of denial would be an adverse effect upon the future adequacy, reliability, or efficiency of energy supply to the applicant, to the applicant's customers, or to the people of Minnesota and neighboring states.

[13] Minn. R. 7849.0120 B: A more reasonable and prudent alternative to the proposed facility has not been demonstrated by a preponderance of the evidence on the record.

[14] Minn. R. 7849.0120 C: By a preponderance of the evidence on the record, the proposed facility, or a suitable modification of the facility, will provide benefits to society in a manner compatible with protecting the natural and socioeconomic environments, including human health.

- The proposed Project will have substantial benefits for meeting overall state energy needs in terms of enhanced regional reliability and lowering electricity sector emissions.

DOC DER further recommended that the Commission consider the evaluation and impacts detailed in the EIS for subpart (C)(2) of these criteria.

Concerning Minn. R. 7849.0120 D[15], DOC DER concluded:

- Based on the analysis, the proposed Project would comply with relevant state and federal regulations and policies.

b. Policy analysis of other Statutory Criteria

There are several remaining criteria in statutes and rules applicable to a CN that do not closely fit into the rule decision criteria discussed above. These criteria are grouped into a final category of Policy Considerations.

- **Robustness of the Transmission System**. The proposed Project will provide benefits through enhanced regional reliability and lower costs for electric consumers in Minnesota.
- **Renewable Energy Preference**. The proposed Project is not intended to interconnect any particular generation resource. Moreover, the proposed Project is not needed to transmit power from a particular new generation resource. Rather, the proposed Project would transmit electricity on the existing high-voltage grid generally. Therefore, these renewable preference statutes do not apply.
- **Distributed Generation**. There would be no significant impacts from distributed generation over the Proposed Project.
- **Innovative Energy Project Preference**. Since the proposed Project in question is a transmission line rather than a generating facility, this statute does not apply.
- **Renewable Energy Standard (RES) Compliance**. Dairyland, Southern Minnesota Municipal Power Agency, and Xcel all complied with the RES for 2023 and projections indicate compliance with future milestones for all three utilities. Additionally, Xcel Energy complied with the small-scale Solar Energy Standard (SES) in 2021 and the 10% by 2030 goal which will satisfy the overall SES requirements through year 2035.
- **Environmental Cost Planning.** This requirement is not applicable as the proposed Project is a transmission line, not a generating facility.
- **Statewide Carbon Dioxide Emissions**. The Commission has previously deemed this requirement is no longer applicable due to existing state laws limiting emissions.
- **Local Jobs Impact**. The Department concluded that Xcel Energy has adequately addressed this statutory requirement, and the Project is estimated to employ about 50

[15] Minn. R. 7849.0120 D: The record does not demonstrate that the design, construction, or operation of the proposed facility, or a suitable modification of the facility, will fail to comply with relevant policies, rules, and regulations of other state and federal agencies and local governments.

to construction workers for 2 to 3 years plus 5 additional workers to perform periodic inspections of the line every four years.
- **Domestic Content Preference & Inflation Reduction Act Compliance**. These provisions primarily apply to generation projects, not transmission projects. Xcel Energy has evaluated the IRA for applicability to this Project and has not identified any opportunities under the IRA to reduce the cost of the Project for customers.

c. Recommended Certificate of Need Conditions

In addition, DOC DER recommend that the Commission apply the following conditions to a certificate of need approval:

1. The cost cap be based upon the low end of the range of costs provided in the application ($524.7 million).

2. The Commission clarify that Xcel bears the burden of proof in any future regulatory proceeding related to the recovery of costs above this estimate.

The Department recommended that should the Commission find, after consideration of the ER, that the proposed facility "will provide benefits to society in a manner compatible with protecting the natural and socioeconomic environments, including human health", the Commission issue a CN to the Applicant.

2. The Joint Commenters

Clean Grid Alliance, Minnesota Center for Environmental Advocacy, Fresh Energy, Sierra Club, Clean Energy Economy Minnesota, Center for Rural Affairs, Union of Concerned Scientists, the National Audubon Society, and the Citizens Utility Board of Minnesota (collectively, the "Joint Commenters") submitted comments on the merits of the certificate of need application and provided an analysis of the project based on the requirements of Minn. R. 7849.0120 subpart C, specifically addressing how this Project will:

- Support overall state energy needs.
- Produce socioeconomic and environmental benefits.
- Induce future developments in clean energy technologies.
- Protect and enhance environmental quality through emissions reductions.
- The Project complies with relevant policies, rules, and regulations.
- The Project also helps achieve Minnesota's Carbon-Free Standard.

The Joint Commenters indicated support for the 345 kV transmission line project because the project will reduce congestion, enhance system reliability, aid in the transition away from emissions-intensive generation, and provide an outlet for regional transfers of clean, affordable energy. The Joint Commenters concluded that the Project meets the requirements of Minn. Stat. § 216B.243 and Minn. R. 7849.0120 and will assist utilities in complying with Minnesota's

Carbon-Free Electricity Standard.[16] For these reasons, the Joint Commenters indicated support for the Applicant's request for a certificate of need.

3. The Prehn Family and Overland – Legalectric – NoCapX 2020

NoCapX 2020 stated that Xcel's 2024 Peak Demand dropped 409 MW from 2023 Peak Demand and that Xcel's peak demand in 2004 was 1,000 MW lower than the peak demand in 2006 and claimed that Xcel Energy has met its need each year and that Xcel Energy has historically overstated its demand (ex. during the CapX 2020 need docket) claiming that there is no need for a MISO Tranche 1, which includes this Project. NoCap X 2020 listed a number of existing transmission lines in southern Minnesota built during the CapX 2020 period, but did not offer analysis of its claim on why this new MMRT Project is not needed or how the existing lines could address the stated need for this Project.

4. MISO

MISO submitted comments describing the planning functions it performs as a Regional Transmission Organization (RTO) and provided a summary of the findings regarding the Mankato - Mississippi River Transmission Project, including how this Project supports a wide range of energy policies and generation scenarios. MISO explained how the benefits of the LRTP Tranche 1 portfolio have been defined and confirmed and how the cost allocation for this project was allocated to the MISO's Central and North Regions, which includes Minnesota. The MMRT Project was approved by MISO on July 25, 2022, as part of MISO's MTEP21 process. This approval was based on a set of reliability, economic, and public policy analyses conducted between 2020 and 2022 that documented the reliability benefits of the Mankato - Mississippi River Transmission Project and the combined reliability, economic, and public policy benefits of the full LRTP Tranche 1 portfolio. Concluding, MISO stated that this Project proposed by Xcel Energy would provide substantial reliability, economic, and public policy benefits to Minnesota. These facilities also fit well as a component of the MISO regional plan for the continued development of a reliable and economic regional transmission system.

In reply comments, MISO responded to NoCapX 2020 assertions that MISO is not the Regulator and other claims by clarifying its role and the MTEP process it oversees for transmission planning which follows a Federal Energy Regulatory Commission (FERC) approved process to ensure benefits to the public through enhanced local and regional reliability of the transmission system.

5. Landowner Comments

Although most individual comments received addressed the route application and its impacts, CFERS, LLC (Citizens For Environmental Rights & Safety), a collection of approximately 75

[16] MINN. STAT. § 216B.1691, subd. 2g (requiring all electric utilities to provide 100 percent carbon-free electricity by 2040).

landowners and citizens of the State of Minnesota who banded together as a rural neighborhood coalition indicated its strong reservation about sacrificing their environmental rights and safety expressly for sending energy through Minnesota for the benefit of out-of-state clients for Xcel Energy (a/k/a NSP Company) and their MISO partners. CFERS recommended that this project should not be approved or permitted.

The majority of comments about the route permit application and the Project focused on potential impacts such as: health concerns about transmission lines, specifically electric and magnetic fields; stray voltage impacts to livestock; vegetation management concerns; impacts to wildlife and avian species; impacts on property values; proximity to residences; and impacts to agricultural operations; noise during construction; aesthetics; groundwater; emissions.

Staff notes that these potential impacts of concern raised by the landowners' have been evaluated in the route permit proceeding of these dockets, specifically in the EIS. The EIS discussed the potential impacts, provided information, and, where appropriate, recommended measures to mitigate or avoid the identified impacts.

6. Xcel Energy Comments

Xcel Energy stated that this Project was studied, reviewed, and approved as part of the Long-Range Transmission Planning (LRTP) Tranche 1 Portfolio by the MISO's Board of Directors in July 2022 as part of its 2021 Transmission Expansion Plan (MTEP21) report and that the Project, along with LRTP Tranche 1 Portfolio will provide significant benefits to the Midwest subregion of the MISO footprint by facilitating more reliable, safe, and affordable energy delivery. Specifically, this Project will provide additional transmission capacity that is needed to reliably deliver renewable energy to customers. Xcel asserted that this Project will relieve overloads on existing transmission facilities and will reduce congestion on the transmission system, resulting in lower energy costs, and will help make significant progress towards Minnesota's carbon emission reduction policy objectives.

In addition to meeting system reliability needs, Xcel argued that the MMRT Project will also provide economic benefits to help offset its costs. Xcel Energy conducted additional economic analysis of MMRT Project and determined that it will provide up to $2.1 billion in economic savings across the MISO footprint over the first 20 years that the Project is in service and up to $3.8 billion in economic savings across the MISO footprint over the first 40 years. These economic savings will help offset the capital cost of the Project.[17]

MISO's analysis of the Project demonstrated the implementation of the LRTP Tranche 1 Portfolio is estimated to reduce carbon emissions by 399 million metric tons over

[17] Application at 49 and 58-59 (April 2,2024).

the first 20 years and 677 million metric tons over the first 40 years that the LRTP Tranche 1 Portfolio is in service.[18] Xcel Energy also analyzed the carbon reduction benefits of the LRTP4 project. Xcel Energy estimated that the LRTP4 project will reduce carbon emissions by 197.9 million metric tons over the first 20 years that the LRTP4 project is in service and by 295.5 million metric tons over the first 40 years that the LRTP4 project is in service.

Xcel Energy provided information on the two system alternatives that were analyzed and rejected because of technical considerations, higher cost or delay for the in-service date due to additional lead times required for critical components (transformers -four years and circuit breakers – 2.5 years): (1) the 230 kV alternative; and (2) the Chester Junction Alternative to Segment 4. The 230 kV alternative would replace the proposed 345 kV transmission line for Segments 1-3 of the proposed Project with a lower voltage 230 kV line. The Chester Junction Alternative involves the construction of a new substation at Chester Junction along Segment 3 to eliminate the need to construct the new 161 kV transmission line in Segment 4 of the proposed Project. Xcel's analysis determined that these system alternatives were inadequate because a 230 kV line would require adding additional transformers at the substation endpoints. The Chester Junction Alternative was deemed uneconomical because it would require constructing a new $33.6 million substation and two new 161 kV transmission lines at an additional $17.4 million for a total of cost $51 million and the human and environmental impacts would be similar to the impacts for Segment 4 line.

Xcel Energy concluded that the proposed Project is needed to address thermal and voltage reliability issues on the transmission system in southern Minnesota while it will provide economic benefits and a reduction in carbon emissions.

Xcel Energy stated that the Project satisfies the certificate of need statutory and rule requirements, and a certificate of need should be granted. If granted a CN, Xcel Energy requested that the Commission approve a condition similar to the one ordered by the Commission in *In the Matter of the Application for a Certificate of Need for the Big Stone South – Alexandria – Big Oaks Transmission Project* in docket# CN-22-538 and proposed the following:

> Xcel Energy shall provide an updated cost estimate for the Project that reflect the Commission's decision within 60 days of this order. Xcel Energy bears the burden of proof in any future regulatory proceeding related to the recovery of any costs above this updated cost estimate.

[18] Application at 77 and Appendix G-1 at 79 (April 2, 2024) (MTEP21 Report Addendum).

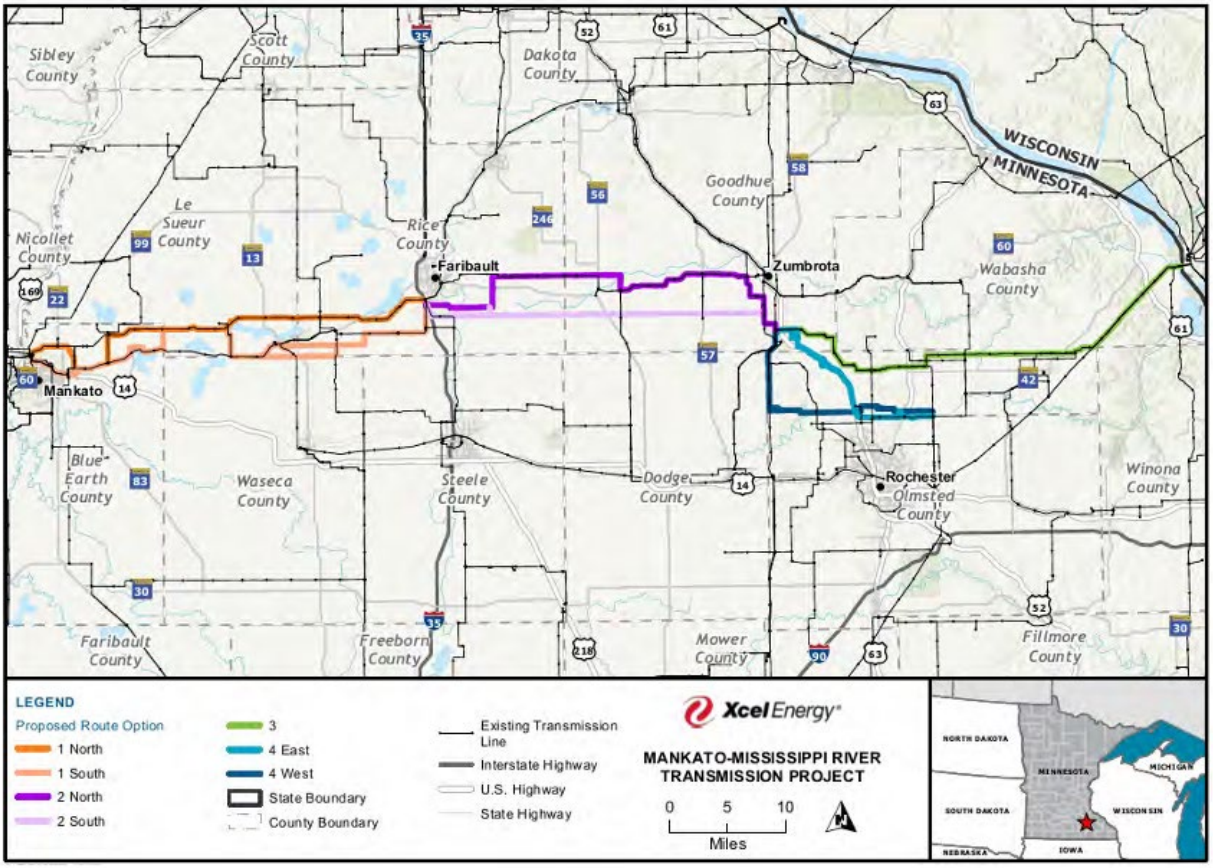
Xcel Energy provided reply comments responding to initial comments that were submitted by DOC DER, MISO, the Joint Commenters, and the Prehn Family and NoCapX 2020.

Xcel Energy clarified that the Project is critical to addressing thermal and voltage reliability issues on the transmission system in southern Minnesota and it will also provide congestion relief, economic benefits, and reduce carbon-dioxide emissions by supporting greater utilization of lower-cost renewable generation. Xcel Energy renewed its request that the Commission approve the Application on its merits and grant a Certificate of Need for the Project because the record developed in this proceeding demonstrates that the Project meets all the requirements to obtain a Certificate of Need.

ROUTE PERMIT APPLICATION

In its Route Permit Application, Xcel Energy originally divided the Project into four segments based on the differences between routing opportunities between endpoints: Segments 1, 2 and 3 making up the 345 kV portion, and Segment 4 the 161 kV portion. A Project Overview Map of the original segments is provided below:

Project Overview Map



A general description of proposed routes by segment is provided below.

- Segment 1 Wilmarth to West Faribault—a new 345 kV transmission line between the existing Wilmarth Substation and a point near the West Faribault Substation.
    - Alternatives include a north route primarily double-circuited with an existing 115 kV transmission line, and a south route double-circuited with 69 kV and 115 kV transmission lines as well as some smaller greenfield segments. The overall length would be approximately 48-54 miles.

Segment 1 Overview

- Segment 2 West Faribault to North Rochester—a new 345 kV transmission line between a point near the existing West Faribault Substation and the existing North Rochester Substation.

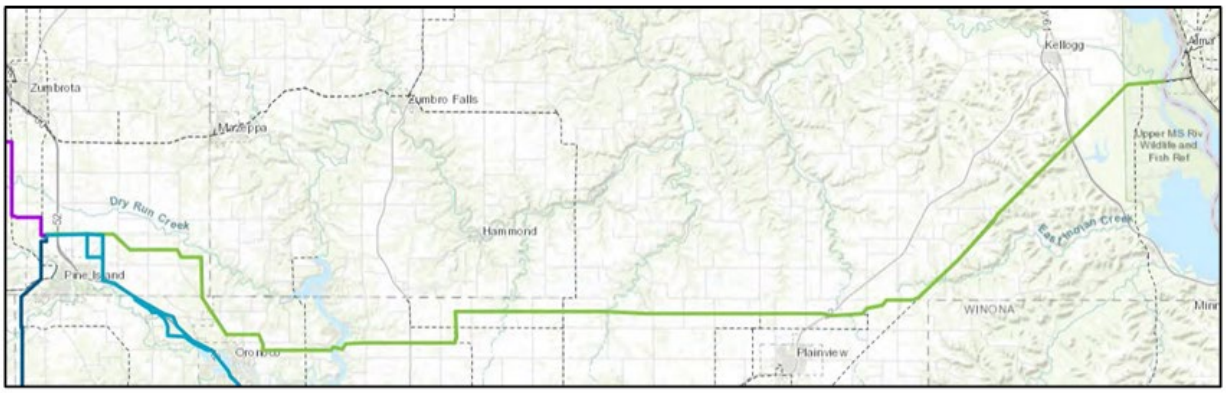
    - Alternatives include a north route that would be partially double-circuited with existing 69 kV and 345 kV transmission lines and a south route which would be primarily constructed in a new corridor, with a smaller portion at the east end double-circuited with an existing 345 kV line. The total length for Segment 2 would be approximately 34 to 42 miles.

Segment 2 Overview

- Segment 3 North Rochester to Mississippi River—a new 345 kV transmission line between the existing North Rochester Substation and the Mississippi River. This segment involves converting an existing 161/345 kV transmission line to 345/345 kV operation and adding a new 345 kV circuit to existing double-circuit structures. This segment was permitted by the Commission as part of the CapX2020 Hampton – La Crosse Project in 2012.

    - Segment 3 includes a single proposed route for the new 345 kV transmission line between the North Rochester Substation and the Mississippi River because alternatives to this segment were already considered during the CapX2020 Hampton – La Crosse Project route permit proceeding. Segment 3 is approximately 43 miles in length.

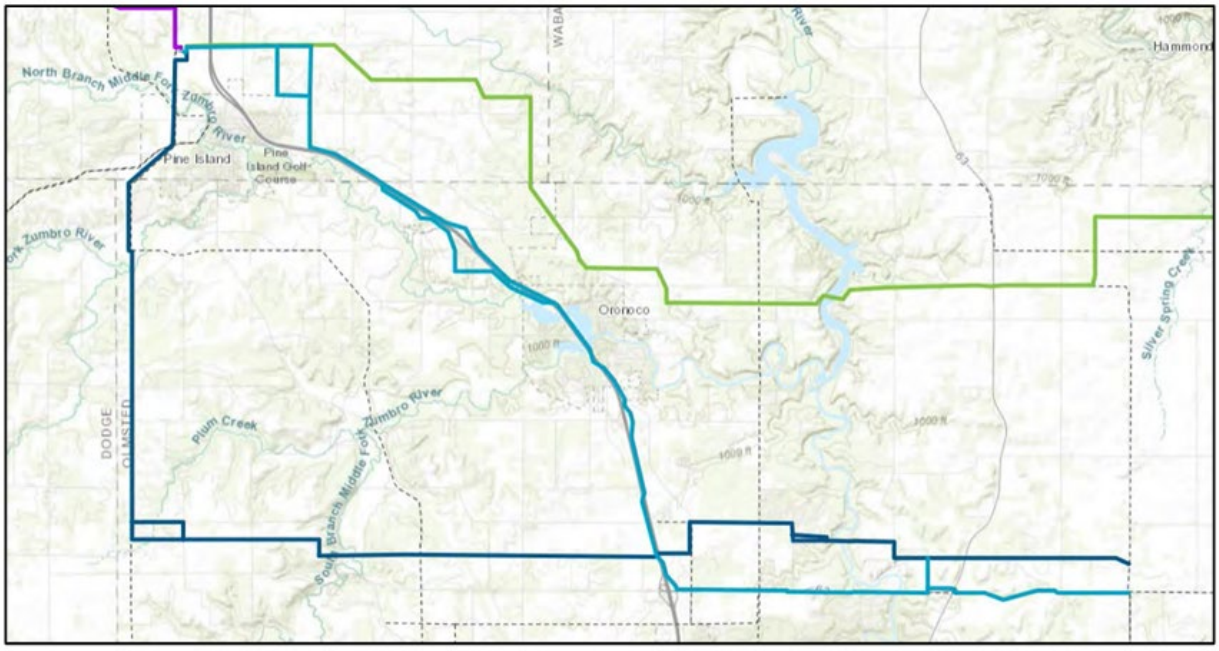
Segment 3 Overview



- Segment 4 North Rochester to Chester—removal and relocation of a portion of a 161 kV transmission line which is needed because a portion of the new 345 kV line in Segment 3 would displace the 161 kV line is currently double-circuited with an existing 345 kV line.

    - Proposed alternatives include an east route that follows existing transmission corridors and Highway 52 for most of its length, and a west route that follows a combination of roads, property lines and existing transmission lines. The length would be approximately 20 to 24 miles.

Segment 4 Overview



The following table provides a more detailed description of the four segments and alternatives.

In addition to the end-to-end Route Options described below, alternative and connector segments were included in the Application. Connectors are included to provide options to shift between identified Proposed Routes. Alternative segments are typically included in locations where landowners requested alternatives to proposed routes, and where the alternatives had approximately comparable, but different, impacts. Detailed descriptions of connector and alternative segments are included in Section 6.4 of the Route Permit Application.

Project Route Options

Route Option	General Description
Segment 1 – Mankato to Faribault (345 kV)	
1 North	Follows existing Xcel Energy owned 115 kV transmission line between the cities of Mankato and Faribault. Would double-circuit new 345 kV with an existing 115 kV line.
1 South	Follows existing Xcel Energy owned 69 kV and 115 kV lines between the cities Mankato and Faribault. Follows roads and property lines in areas where not following transmission lines. Would double-circuit with existing transmission lines (for approximately 72 percent of the route).
Segment 2 – Faribault to Pine Island (North Rochester substation)(345 kV)	
2 North	Includes a combination of paralleling roads and double-circuited with an existing 69 kV transmission line between the cities of Faribault and Zumbrota. Eastern portion would be double-circuited with existing Hampton to North Rochester 345 kV line.
2 South	Includes a combination of paralleling existing roads and property lines. Smaller portions would be double-circuited with existing 161 kV and 345 kV line on either end.
Segment 3 – North Rochester Substation to Mississippi River (345 kV)	
3	Follows/uses the second circuit position on the existing North Rochester to La Crosse 345 kV transmission line. Segment 3 does not require any new right-of-way.
Segment 4 – North Rochester Substation to Chester Line (161 kV)	
4 East	Follows Highway 52 between Pine Island and Highway 63, then follows Highway 63/75th Street east where it would be double-circuited with an existing 69 kV line.
4 West	Parallels existing 161 kV and 345 kV lines south from Pine Island, then turns and follows a combination of roads and property lines to the east.

In addition to the routes proposed by Xcel Energy, the DOC EERA proposed to evaluate in the EIS three system alternatives (No-build Alternative, Chester Junction System Alternative, and 230 kV System Alternative), 10 route segment alternatives and five alternative alignments as described in EERA's September 19, 2024 Scoping Summary and Recommendations.[19]

[19] DOC EERA, Scoping Summary and Recommendations, September 19, 2024

In addition to these alternatives (both system alternatives and route and alignment alternatives) proposed for inclusion in the EIS by DOC EERA, on October 9, 2025, the Commission concurred with EERA's scoping recommendations; additionally, the Commission[20] included a modified alternative route segment for analysis in the EIS.

> Expand Route Segment 9 from EERA's September 19, 2024 comments by also studying a continuation of a straight line Southwest of that proposed alternative from the point where that proposed alternative turns West to reconnect with Route Option 1 such that the line would continue straight to connect with 230th St. W. to the south where it would then turn West to reconnect with Route Option 1. Thus, moving the line further away from Cannon Lake.

In its December 2, 2024, Scoping Decision[21] after EERA gathered input on the scope of the EIS through seven public scoping meetings and an associated comment period and Commission review, and further refinement of some route segment alternatives with the proposers, including input from MnDOT on Route Segment 17 (Highway 14 Option), EERA expanded the alternatives to the Project, included these additional system alternatives (in addition to the Chester Junction System Alternative and the 230 kV System Alternative):

- No-build;
- Demand side management;
- Purchased power;
- Transmission line of a different size or using a different energy source than the source proposed by the applicant;
- Upgrading existing facilities;
- Generation rather than transmission; and
- Use of renewable energy sources.

The EIS evaluated the following routes, route segments, and alignment alternatives: Segment 1 North, Segment 1 South, Segment 2 North, Segment 2 South, Segment 3, Segment 4 East, Segment 4 West, Route Segment 1, Alignment Alternative 2, Route Segment 5, Route Segment 6, Route Segment 7, Alignment Alternative 8, Route Segment 9, Route Segment 10, Route Segment 11, Route Segment 12, Route Segment 13, Alignment Alternative 15, Alignment Alternative 16, Route Segment 17 (Highway 14 Option), and Route Segment 18.

Detailed maps of these routes and route alternatives are found in the Final EIS (FEIS) – Appendix B Scoping Decision (Part 2 through 4). Appendix D of the FEIS contains a table that identifies all alternatives (from scoping) or the applicant proposed (route permit application (RPA)) and identifies the alternative proposer, alternative ID or the RPA segment, applicable

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20 Minnesota Public Utilities Commission (May 9, 2024) Order.

21 DOC EERA Scoping Decision, December 2, 2024

segment name and the EIS name as identified in the paragraph above.

The EFIS relative merits analysis of the Route Segments 1 North and 1 South found that Segment 1 South is not consistent with two routing factors (Aesthetics and Displacement) or that the potential for impacts from Segment 1 South are anticipated to be moderate on those two factors, but the impacts are greater than the option Segment 1 North. On balance, Segment 1 North option has fewer overall anticipated impacts.

Segment 2 is mainly comprised of a north and a south segment option with connector 2G in between allowing the route to switch from Segment 2 North to 2 South or from Segment 2 South to 2 North. The FEIS refers to these options as Segment 2 North-North, Segment 2 North-South, Segment 2 South-North, and Segment 2 South-South. For example, Segment 2 North-South Option starts from the West Faribault Substation as the north route option and then at connector 2G it switches to the south route option until it reaches Pine Island. When analyzed as a whole from endpoint to endpoint, Segment 2 North has fewer overall impacts than Segment 2 South, but when considering the four individual segments that make up Segment 2, the FEIS determined that a route that starts with Segment 2 North until it reaches connector 2G and then switches to Segment 2 South until its endpoint at Pine Island (Segment 2 North-South) has fewer impacts than any other possible combinations (2 N-N, 2 S-N, 2 S-S).

When comparing the relative merits of the combined Segment 1 and Segment 2 route options along with all their alternatives (including Route Segment 17 – Hwy 14 Option), the FEIS found that Route Option B – comprised of Segment 1 North (with Route Segment 18) and with Segment 2 North (from Faribault to Connector 2G), including Connector 2G and then Segment 2 South (from connector 2G until North Rochester) has the fewest impacts overall. The other options analyzed were Option A (Segment 1 North and Segment 2 North) and Option C (Route Segment 17 (Highway 14 Option)).[22] The potential impacts of the Segment 1 and 2 route options are summarized in Table 8-1 and Table 8-3 of the FEIS, pages 518-524.

Segment 3 (as proposed) does not have alternatives because it follows/uses the second circuit position on the existing North Rochester to La Crosse 345 kV transmission line. Segment 3 does not require any new right-of way. FEIS provided a summary of the routing factors for Segment 3 in Table 9-25 of the FEIS (page 635). The analysis found that Segment 3 has minimal impacts with mitigation, or the route is consistent with all the routing factors considered.

Segment 4. The FEIS found that Segment 4 CapX Co-Locate Option (being referred to as Route Option D in the FEIS) has the fewest impacts when compared to the other three Segment 4 alternatives (Segment 4 West, Segment 4 West Modified, and Segment 4 East).

ADMINISTRATIVE LAW JUDGE REPORT

To ensure robust record development, public participation, and examination of the issues,

[22] FEIS Section 8, starting at page 518.

and as required by law, the Commission referred the route permit application to the CAH for assignment of an ALJ to preside over contested case proceedings (public and evidentiary hearings) and prepare findings of fact, conclusions of law, and recommendations on the merits of the proposed Project and permit conditions, as necessary.

The ALJ report contained 590 findings and 15 conclusions of law, that determined all procedural requirements for processing the certificate of need and route permit applications were satisfied. It also provided recommendations regarding the adequacy of the Final EIS and the justification of granting a route permit, including designation of a specific route and additional permit conditions. The ALJ also included Addendum 2 which included a summary of the public comments received at the public hearings and written comments. In total, Addendum 2 includes 111 comment summaries. Rather than repeat the ALJ's full analysis in these briefing papers, staff has summarized the recommendations. Staff refers the Commission to the ALJ Report for the complete analysis.

1. Adequacy of the Final EIS

The ALJ concluded that: (i) EERA and EIP conducted an appropriate environmental analysis for the Project and this proceeding and the Final EIS satisfied applicable law, including Minn. Stat. § 216E.03, subd. 5 and Minn. R. 7850.2500; (ii) the Final EIS addressed the issues and alternatives raised in scoping to a reasonable extent considering the availability of information and the time limitations for considering the permit application; (iii) the Final EIS provided responses to the comments received during the Draft EIS review process; and (iv) the Final EIS was prepared in compliance with the procedures in Minn. R. chapter 7850.

2. Certificate of Need

The ALJ clarified that the Commission directed the Certificate of Need portion of the Application be handled through the Commission's informal process and as a result, the ALJ Report does not include findings or conclusions on the certificate of need application.

3. Route Permit

The ALJ found that the record evidence demonstrates that constructing the Project along (1) Segment 1 North with Route Segment 18 and Alternative Alignment 2 (Route Option B in FEIS); (2) Segment 2 North with Connector Segment 2G and Segment 2 South (Route Option B in FEIS); (3) Segment 3; and (4) Route Segment 12 (also known as CapX Co-Locate Option or Option D in FEIS) for Segment 4, does not present a potential for significant adverse environmental effects pursuant to the Minnesota Environmental Rights Acts, Minn. Stat. § § 116B.01-116B.13, and the Minnesota Environmental Policy Act, Minn. Stat. § § 116D.01-116D.11. The ALL also found that there is no feasible and prudent alternative to the

construction of the Project. Further, the Project is consistent with, and reasonably required for, the promotion of public health and welfare in light of the state's concern for protecting its air, water, land, and natural resources, as expressed in the Minnesota Environmental Rights Act.

The ALJ recommend that the Commission issue a Route Permit authorizing Xcel Energy to construct and operate the Project in Blue Earth, Goodhue, Le Sueur, Olmsted, Rice, and Wabasha counties in Minnesota, for the following route options:

- Segment 1 North with Route Segment 18 and Alternative Alignment 2 [referred to in the FEIS as Route Option B]
- Segment 2 North, Connector Segment 2G, and Segment 2 South [referred to in the FEIS as Route Option B]
- Segment 3 (as proposed)
- Route Segment 12 (also known as the CapX Co-Locate Option) for Segment 4 [referred to in the FEIS as Route Option D]; and
- associated facilities.

4. Permit Conditions

The ALJ identified a number of special permit conditions on the Route Permit that were proposed by MnDNR in its two comment letters[23][24]. The ALJ indicated the record supports inclusion of these conditions:

- Calcareous Fen: If any calcareous fens are identified within the Project area, the Applicant must work with the MnDNR to determine if any impacts will occur during any phase of the Project. If the Project is anticipated to impact any calcareous fens, the Applicant must develop a Calcareous Fen Management Plan in coordination with the MnDNR, as specified in Minn. Stat. § 103G.223. If a Calcareous Fen Management Plan is required, the approved plan must be submitted currently with the plan and profile.

- Avian Flight Diverters: The Applicant in cooperation with the MnDNR shall identify areas of the transmission line where bird flight diverters will be incorporated into the transmission line design to prevent large avian collisions attributed to visibility issues. Standard transmission design shall incorporate adequate spacing of conductors and grounding devices in accordance with Avian Power Line Interaction Committee standards to eliminate the risk of electrocution to raptors with larger

[23] Minnesota Department of Natural Resources – Comments, July 31, 2024

[24] Minnesota Department of Natural Resources – Comment Letter, June 10, 2025

wingspans that may simultaneously come in contact with a conductor and grounding devices. The Applicant shall submit documentation of its avian protection coordination with the plan and profile.

- Vegetation Management Plan: The Applicant shall coordinate with the Vegetation Management Plan Working Group to develop a Vegetation Management Plan for the Project.

- Wildlife Friendly Erosion Control: The Applicant shall only use "bio-netting" or "natural netting" types of erosion control materials and mulch products without synthetic (plastic) fiber additives.

- Dust Control: To protect plants and wildlife from chloride products that do not break down in the environment, the Applicant is prohibited from using dust control products containing calcium chloride or magnesium chloride during construction and operation of the Project.

- Facility Lighting: The Applicant shall utilize downlit and shielded lighting and minimize blue hue to reduce harm to birds, insects, and other animals.

EXCEPTIONS

Under Minn. R. 7829.2700, exceptions to the ALJ Report must be filed within 15 days of the filing of the report for cases subject to statutory deadlines. Exceptions to the ALJ Report were filed by Xcel Energy and PUC EIP.

1. Xcel Energy Exceptions

In its Exceptions Letter dated November 14, 2025, Xcel Energy proposed several revisions to the ALJ Report. Xcel Energy presented their exceptions is a table format included as Attachment A to their letter. Staff provides Xcel Energy's Exceptions Letter, including Attachment A as Attachment A to these briefing papers.

2. PUC EIP

On November 17, 2025, PUC EIP filed four exceptions addressing typographical corrections to the ALJ Report. PUC EIP also had the chance to review Xcel Energy's exceptions filed on November 14 and indicated they supported Xcel's identified exceptions.

Specifically, the four PUC EIP exceptions are:

1. **Finding 301** of the ALJ report states:

Residences are classified as NAC-1. They are protected by MPCA's most restrictive noise limits. Moreover, different standards are specified for daytime and nighttime hours; as well as standards that may not be exceeded for more than 10 percent of the time during any hour (L10) and 50 percent of the time during any hour (L50). The applicable standards prohibit ambient noise levels in residential areas from exceeding:

- 60 A-weighted decibels for more than 50 percent of any daytime hour;
- 65 A-weighted decibels for more than 50 percent of any daytime hour;
- 50 A-weighted decibels for more than 50 percent of any nighttime hour; and,
- 55 A-weighted decibels for more than 10 percent of any nighttime hour.

To accurately reflect Minnesota Rules Chapter 7030, EIP staff recommends that the finding be amended to read:

Residences are classified as NAC-1. They are protected by MPCA's most restrictive noise limits. Moreover, different standards are specified for daytime and nighttime hours; as well as standards that may not be exceeded for more than 10 percent of the time during any hour (L10) and 50 percent of the time during any hour (L50). The applicable standards prohibit ambient noise levels in residential areas from exceeding:

- 60 A-weighted decibels for more than 50 percent of any daytime hour;
- 65 A-weighted decibels for more than ~~50~~ 10 percent of any daytime hour;
- 50 A-weighted decibels for more than 50 percent of any nighttime hour; and,
- 55 A-weighted decibels for more than 10 percent of any nighttime hour.

2. **Finding 362** of the ALJ Report states:

Minn. Stat. § 216B.1691, subd. 1(e) (2024), defines an "environmental justice area" as an area that meets one or more of the following criteria: (1) 40 percent or more of the area's total population is nonwhite; (2) 35 percent or more of households in the area have an income that is at or below 200 percent of the federal poverty level; (3) 40 percent or more of the area's resident's over the age of five have limited English proficiency; or (4) the area is located within Indian County, as defined in United States Code, title 18, section 1151.

EIP staff recommends that the finding be amended to read:

Minn. Stat. § 216B.1691, subd. 1(e) (2024), defines an "environmental justice area" as an area that meets one or more of the following criteria: (1) 40 percent or more of the area's total population is nonwhite; (2) 35 percent or more of households in the area have an

income that is at or below 200 percent of the federal poverty level; (3) 40 percent or more of the area's resident's over the age of five have limited English proficiency; or (4) the area is located within Indian ~~County~~ Country, as defined in United States Code, title 18, section 1151.

3. **Finding 457** of the ALJ Report states:

Like the 345 kV route options, construction of the Route Options A, B, C, and D will result minor short-term air quality impacts from the operation of heavy-duty construction equipment and fugitive dust. The Applicant will employ familiar construction related practices to contain fugitive dust.

EIP staff recommends that the finding be amended to read:

Like the 345 kV route options, construction of the Route Options A, B, C, and D will result in minor short-term air quality impacts from the operation of heavy-duty construction equipment and fugitive dust. The Applicant will employ familiar construction related practices to contain fugitive dust.

4. **Finding 511** of the ALJ Report states:

The table below summaries the number of acres of forested landcover in the four 161 kV route options for Segment 4.

EIP staff recommends that the finding be amended to read:

The table below ~~summaries~~ summarizes the number of acres of forested landcover in the four 161 kV route options for Segment 4.

STAFF DISCUSSION

The following issues are before the Commission:

- Whether to adopt the ALJ Report
- Weather to find the Final EIS adequate
- Whether to grant a certificate of need for the MMRT Project, make specific findings, and require conditions, as necessary
- Weather to grant a route permit for the MMRT Project and identify a route and any special permit conditions, as necessary.

Based on information in the certificate of need and route permit application, the analysis provided in the EIS, public comments, testimony, the ALJ Report, and other evidence in the

record, staff provides the discussion below.

1. ALJ Report

Staff agrees with the findings, conclusions, and recommendations reached by the ALJ. Staff finds that the ALJ Report is a sound, comprehensive, and common sense ruling that is reflective of the case record in the route permit proceeding. The ALJ Report documents that the procedural requirements were followed and presents findings of fact for each of the decision criteria that must be met for a route permit for a high-voltage transmission line.

2. Final EIS

Staff agrees with the recommendation of the ALJ that the Final EIS: (1) addressed the issues and alternatives raised in scoping; (2) provided responses to comments received during the draft EIS review process; and (3) was prepared in compliance with the procedures in Minn. R. chapter 7850.

Alternatively, if the Commission does not find the EIS complete, it must identify the reasons it is not complete and request that the EIS be revised or supplemented. In that case, a schedule for revising or supplementing the EIS would need to be determined and the Commission would need to revisit its decisions after completion of the revised EIS.

3. Certificate of Need

Staff agrees with the Joint Commenters, DOC DER, and the ALJ that Xcel Energy has demonstrated that the MMRT Project meets the certificate of need criteria set forth under Minn. R. 7849.0120 (A, B, C, and D); that the procedural requirements for informal review of a certificate of need application were conducted in accordance with Minn. R. 7829.1200 and Minn. R. 7829.2500; and that the Commission should grant a certificate of need for the MMRT Project.

The Commission should consider applying the following conditions as proposed by the DOC DER related to cost cap and rate recovery requirements:

- The Department recommended the cost cap be based upon the low end of the range ($524.7 million).

- The Department recommended the Commission clarify that Xcel bears the burden of proof in any future regulatory proceeding related to the recovery of costs above this estimate.

If the Commission decides to issue a certificate of need it must make written findings with respect to the criteria set forth in Minn. R. 7849.0120. Staff believes the DOC DER comments provide the required findings to make a positive determination on a certificate of need.

Xcel Energy Reply Comments on CN Merits

Xcel Energy requested that it be allowed to file an updated final cost estimate for the Project or cap amount within 60 days of the Commission's Order determining the route.

Alternatively, the Commission can deny a certificate of need. If the Commission denies the certificate of application, it must state the reasons for the denial.

4. Route Selection

Staff agrees with the recommendation of the ALJ that granting a route permit for the route identified in the ALJ Report as discussed in these briefing papers on page 22 and again identified below is consistent with Commission's routing criteria and best balances and minimizes impacts overall.

- Segment 1 North with Route Segment 18 and Alternative Alignment 2 [referred to in the FEIS as Route Option B]
- Segment 2 North, Connector Segment 2G, and Segment 2 South [referred to in the FEIS as Route Option B]
- Segment 3 (as proposed)
- Route Segment 12 (also known as the CapX Co-Locate Option) for Segment 4 [referred to in the FEIS as Route Option D]; and
- associated facilities.

As requested by Xcel Energy, staff recommends the Commission also authorize a route width of 1,000 feet (500 feet to either side of the proposed centerlines), with wider areas around Project substations, area with routing constraints, and where route options join together. The applicant requested some areas to have a route width wider than 1,000 feet. These areas are typically near substations or locations with routing constraints. Areas where the route width varies from the typical 1,000-foot width are summarized in Table 3-6 of the FEIS page 60.

Table 3-6 Summary of Route Width Variations

Associated Segment	Location(s) of Variable Route Width
Segment 1 North and South	Around the Wilmarth Substation
Segment 1 North	None
Segment 1 South	Southeast of Ballentine Lake and northwest of Madison Lake Around the Eastwood Substation
Segment 2 North and Segment 2 South	Around the North Rochester Substation and approximately .4 miles northwest of the North Rochester Substation [1]
Route Segment 17 (Hwy 14 Option)	At various locations [2]
Segment 3	None
Segment 4 West	At the southwest corner of the segment
Segment 4 West Modification	None
Segment 4 East	Intersection of Hwy 52 and 100th St NW on the west side Intersection of Hwy 52 and 75th St NW on the west side and northeast side of the highway
Segment 4 CapX Co-Locate Option [3]	Near the intersection of 520th Street and 230th Avenue Just west of the intersection of County Road 18 Northwest and 44th Avenue Northwest East of the Zumbro River where the alternative crosses Highway 63 North

[1] The applicant requested the additional route width northwest of North Rochester Substation on May 5, 2025. Refer to: Northern States Power Company, doing business as Xcel Energy Request to Expand Width Letter, Docket No. 20255-218608-01.
[2] Route Segment 17 (Hwy 14 Option) requires ongoing coordination efforts with MnDOT. The variations in the route width for this alternative were included to allow for flexibility in final design should this alternative be selected by the Commission.
[3] The applicant provided input on where additional flexibility may be required to make the Segment 4 CapX Co-Locate Option more easily constructible. Additional information for the reasoning of the wider route widths for this alternative are provided in Appendix E.

The 345 kV portion of the Project will require a 150-foot-wide ROW. The 161 kV portion of the Project will require an 80- to 100-foot-wide ROW. Table 3-7 of the FEIS summarizes the requested ROW widths by segment at page 61-63.

Table 3-7 ROW Width Summary

Associated Segment	Requested ROW Width	Notes regarding existing ROW
Segment 1 North	150 feet	Nearly all of Segment 1 North (96%) could be double-circuited with an existing 115 kV line. For nearly the entire line, some existing ROW would be present and shared with the project but would require widening.
Segment 1 South	150 feet	Most of Segment 1 South (69%) could be double-circuited with existing 69 kV or 115 kV line. For most of the line, some existing ROW would be present and shared with the project but would require widening.
Segment 2 North	150 feet	Segment 2 North could be double-circuited with existing 69 kV transmission lines for 51% of its length. Where it is double-circuited, some existing ROW would be present and shared with the project but would require widening where it is double-circuited with smaller (69 kV) line.
Segment 2 South	150 feet	Segment 2 South would be primarily constructed in a new ROW that parallels some (27%) existing infrastructure (transmission lines, roads, or railroads) where some opportunity for ROW paralleling/sharing could be present.
Route Segment 17 (Hwy 14 Option)	150 feet	Segment 17 would parallel US Highway 14 from Mankato to Byron. The ROW could overlap with existing MnDOT ROW. Additional information is provided in Section 3.3.2.1.
Segment 3	150 feet	As noted in Section 3.1.4, all of Segment 3 could be double-circuited within the previously permitted route for the CapX2020 Hampton – La Crosse Project. No new ROW would be required for Segment 3.
Segment 4 West	100 feet	Segment 4 West would be primarily constructed in a new ROW that parallels some (46%) existing infrastructure (transmission lines, roads, or railroads) where some opportunity for ROW paralleling/sharing could be present.
Segment 4 West Modification	100 feet	Segment 4 West Modification could be double-circuited with an existing 161 kV line for nearly half of its length (48%). Some existing ROW would be present but would require widening.
Segment 4 East	100 feet	Approximately a quarter (26% of Segment 4 East could be double-circuited with an existing 69 kV line. Some existing ROW would be present but would require widening.
Segment 4 CapX Co-Locate Option	100 feet	The Segment 4 CapX Co-Locate Option would primarily parallel the existing 345 kV line and opportunities for ROW sharing would be present throughout nearly all of its length.

5. ALJ Report Exceptions

The exceptions file by Xcel Energy and PUC EIP do not point out any irregularities or mistakes but instead clarify language and information already in the record or correct typographical errors. Staff recommends the Commission adopt all the exceptions submitted by both Xcel Energy and PUC EIP.

DECISION OPTIONS

ALJ Report

1. Adopt the administrative law judge's findings of fact, conclusions of law, and recommendations to the extent consistent with the decisions below.

And

2. Adopt the following exceptions and clarifications to the ALJ Report as proposed by Xcel Energy in Attachment A to its November 14, 2025 filing:
    A. Page 2, Summary of Recommendation
    B. Finding 106
    C. Finding 108
    D. Finding 223
    E. Finding 245
    F. Finding 280
    G. Finding 282
    H. Page 47, footnote 310
    I. Finding 290
    J. Finding 378
    K. Page 90, footnote 570
    L. Finding 561
    M. Page 103, Recommendation

And

3. Adopt PUC EIP's exceptions to the following ALJ Report findings:
    A. Finding 301
    B. Finding 362
    C. Finding 457
    D. Finding 511.

Environmental Impact Statement

4. Determine that the Final EIS is adequate, in that it: (i) addresses the issues and alternatives raised in scoping; (ii) provides responses to substantive comments received on the Draft EIS, and (iii) was prepared in compliance with Minn. R. chapter 7850.

Or

5. Determine that the Final EIS is not adequate, identify the reasons, and direct PUC EIP to revise it.

Certificate of Need

6. Grant a certificate of need for the MMRT Project. (DOC DER, The Joint Commenters, Xcel Energy)

And

7. Condition the certificate of need determination on requirements that Xcel Energy:

    A. File a final cost estimate for the Project or cap amount within 60 days of the Commission's Order determining the route. (DOC DER, Xcel Energy)

    B. Wait until the first scheduled rate case after the Project is placed in service to request to recover any cost overruns from Minnesota ratepayers. (DOC DER, Xcel Energy)

    C. Fully justify the reasonableness of recovering any cost overruns of the Project from Minnesota ratepayers. Xcel Energy must justify any costs (including operations-and-management expense, ongoing capital expense - including revenue requirements related to capital included in rate base - insurance expense, land-lease expense, and property/production tax expense) that are higher than forecasted in this proceeding. Xcel Energy bears the burden of proof in any future regulatory proceeding related to the recovery of costs above those forecasted in this proceeding. (DOC DER, Xcel Energy)

Or

8. Deny a certificate of need for the MMRT Project and state the reasons for the denial. (NoCapX 2020, CFERS, LLC)

Route Permit

9. Grant a route Permit for the MMRT Project and designate the following route: (ALJ, PUC Staff)

    A. Segment 1 North with Route Segment 18 and Alternative Alignment 2 [referred to in the FEIS as Route Option B]
    B. Segment 2 North, Connector Segment 2G, and Segment 2 South [referred to in the FEIS as Route Option B]
    C. Segment 3 (as proposed)
    D. Route Segment 12 (also known as the CapX Co-Locate Option) for Segment 4 [referred to in the FEIS as Route Option D]; and
    E. associated facilities.

And

10. Authorize a route width of 1,000 feet (500 feet to either side of the proposed centerlines), with wider areas as identified in Table 3-6 of the FEIS.

11. For the 345 kV portion of the Project authorize a 150-foot-wide ROW. For the 161 kV portion of the Project authorize an up to 100-foot-wide ROW.

And

12. Adopt the permit conditions shown the sample route permit and the six special permit conditions as recommended in the ALJ Report.

Or

13. Deny a route permit for the MMRT Project. (NoCapX 2020, CFERS, LLC)

Administrative

14. Delegate authority to the Executive Secretary to modify the route permit and ALJ Report to correct typographic and formatting errors, to reflect recent changes in energy infrastructure permitting legislation as applicable, and to ensure consistency with the Commission's order.

Staff Recommendation: 1, 2(A-M), 3(A-D), 4, 6, 7(A-C), 9(A-E), 10, 11, 12, and 14

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November 14, 2025 **VIA E-FILING**

Sasha Bergman
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

Re: Exceptions to the Administrative Law Judge's Findings of Fact, Conclusions of Law, and Recommendation
IN THE MATTER OF THE APPLICATION OF XCEL ENERGY FOR A ROUTE PERMIT FOR THE MANKATO TO MISSISSIPPI RIVER 345 KV TRANSMISSION PROJECT IN SOUTHERN MINNESOTA
MPUC DOCKET NO. E002/TL-23-157
CAH DOCKET NO. 65-2500-40099

Dear Ms. Bergman,

Northern States Power Company, doing business as Xcel Energy, appreciates the thorough and detailed Findings of Fact, Conclusions of Law, and Recommendation (ALJ Report) filed by Administrative Law Judge Ann C. O'Reilly on October 30, 2025. Attachment A to this filing details Xcel Energy's minor exceptions to the ALJ Report. Xcel Energy respectfully requests that the Minnesota Public Utilities Commission adopt the ALJ Report with the modifications outlined in Attachment A.

Sincerely,

/s/ Valerie T. Herring

Valerie T. Herring

Enclosure
cc: Service List

Attachment A

Location in ALJ Report	ALJ Report Language	Applicant's Proposed Redline	Clean Version
Page 2, Summary of Recommendation	Segment 2 North, Conductor Segment 2G, and Segment 2 South [referred to in the FEIS as Route Option B].	Segment 2 North, ~~Conductor~~ Connector Segment 2G, and Segment 2 South [referred to in the FEIS as Route Option B].	Segment 2 North, Connector Segment 2G, and Segment 2 South [referred to in the FEIS as Route Option B].
Page 17, Finding No. 106	For portions of the Project where the new 345 kV lines will be co-located with existing 69 kV transmission lines, Xcel Energy will build below these existing 69 kV transmission lines with the new 345 kV line.	For portions of the Project where the new 345 kV lines will be co-located with existing 69 kV transmission lines, Xcel Energy will underbuild ~~below~~ these existing 69 kV transmission lines with the new 345 kV line.	For portions of the Project where the new 345 kV lines will be co-located with existing 69 kV transmission lines, Xcel Energy will underbuild these existing 69 kV transmission lines with the new 345 kV line.
Page 17, Finding No. 108	No new structures are anticipated to be required for Segment 3. Segment 3 involves converting an existing 161/345 kV transmission line to 345/345 kV operation or installing a new 345 kV circuit on structures that now host double-circuits.	No new structures are anticipated to be required for Segment 3. Segment 3 involves converting an existing 161/345 kV transmission line to 345/345 kV operation or installing a new 345 kV circuit on existing double-circuit structures~~ that now host double-circuits~~.	No new structures are anticipated to be required for Segment 3. Segment 3 involves converting an existing 161/345 kV transmission line to 345/345 kV operation or installing a new 345 kV circuit on existing double-circuit structures.
Page 35, Finding No. 223	The westernmost 27 miles of Segment 3 would convert an existing 161 kV	The westernmost ~~27~~ 16 miles of Segment 3 would convert an existing 161 kV	The westernmost 16 miles of Segment 3 would convert an existing 161 kV

Location in ALJ Report	ALJ Report Language	Applicant's Proposed Redline	Clean Version
	transmission line to 345 kV operation. The easternmost 16 miles of Segment 3 would involve installing new 345 kV transmission lines on the existing transmission structures. Additionally, the Mississippi River crossing would not require any new construction because the existing 69 kV line would be converted to 345 kV operation.	transmission line to 345 kV operation. The ~~easternmost~~ next approximately 16 miles of Segment 3 would involve installing new 345 kV transmission lines on the existing transmission structures. Additionally, the Mississippi River crossing would not require any new construction because the existing 69 kV line would be converted to 345 kV operation.	transmission line to 345 kV operation. The next approximately 16 miles of Segment 3 would involve installing new 345 kV transmission lines on the existing transmission structures. Additionally, the Mississippi River crossing would not require any new construction because the existing 69 kV line would be converted to 345 kV operation.
Page 39, Finding No. 245	In the later Direct Testimony of Company witness Ellen Heine, however, the Applicant stated that it had analyzed the route and alignment alternatives studied in the EIS and, as a result of that analysis, Excel Energy determined its current preferred route for each segment of the Project.	In the later Direct Testimony of Company witness Ellen Heine, however, the Applicant stated that it had analyzed the route and alignment alternatives studied in the EIS and, as a result of that analysis, ~~E~~Xcel Energy determined its current preferred route for each segment of the Project.	In the later Direct Testimony of Company witness Ellen Heine, however, the Applicant stated that it had analyzed the route and alignment alternatives studied in the EIS and, as a result of that analysis, Xcel Energy determined its current preferred route for each segment of the Project.

Location in ALJ Report	ALJ Report Language	Applicant's Proposed Redline	Clean Version
Page 46, Finding No. 280	The Commission is also going by Minn. R. 7850.4100 (2025), which mandates consideration of the following factors when determining whether to issue a route permit for a high-voltage transmission line.	The Commission is also going by Minn. R. 7850.4100 ~~(2025)~~ (2023), which mandates consideration of the following factors when determining whether to issue a route permit for a high-voltage transmission line.	The Commission is also going by Minn. R. 7850.4100 (2023), which mandates consideration of the following factors when determining whether to issue a route permit for a high-voltage transmission line.
Page 47, Finding No. 282	Minnesota Rule 7850.4100(A) (2023) requires consideration of the Project's effects on human settlement, including displacement of residences and businesses, noise created during construction or by operation of the Project, and impacts to aesthetics, cultural values, recreation, and public services.	Minnesota Rule 7850.4100(A) ~~(2025)~~ (2023) requires consideration of the Project's effects on human settlement, including displacement of residences and businesses, noise created during construction or by operation of the Project, and impacts to aesthetics, cultural values, recreation, and public services.	Minnesota Rule 7850.4100(A) (2023) requires consideration of the Project's effects on human settlement, including displacement of residences and businesses, noise created during construction or by operation of the Project, and impacts to aesthetics, cultural values, recreation, and public services.
Page 47, Footnote No. 310	Minn. R. 7850.4100 (2025).	Minn. R. 7850.4100 ~~(2025)~~ (2023).	Minn. R. 7850.4100 (2023).

Location in ALJ Report	ALJ Report Language	Applicant's Proposed Redline	Clean Version
Page 49, Finding No. 290	Comparison of Residential Impacts for Segments 1 and 2 and Route Segment 17	Comparison of Non-Residential Impacts for Segments 1 and 2 and Route Segment 17	Comparison of Non-Residential Impacts for Segments 1 and 2 and Route Segment 17
Page 62, Finding No. 378	Minnesota Rule 7850.4100(B) (2025) requires consideration of the Project's effect on public health and safety.	Minnesota Rule 7850.4100(B) ~~(2025)~~ (2023) requires consideration of the Project's effect on public health and safety.	Minnesota Rule 7850.4100(B) (2023) requires consideration of the Project's effect on public health and safety.
Page 90, Footnote No. 570	Minn. R. 7850.4100(H) (2025)	Minn. R. 7850.4100(H) ~~(2025)~~ (2023)	Minn. R. 7850.4100(H) (2023)
Page 95, Finding No. 561	Minn. R. 7850.4100(M) (2025) requires consideration of unavoidable human and environmental impacts. Resource impacts are unavoidable when an impact cannot be avoided even with mitigation strategies.	Minn. R. 7850.4100(M) ~~(2025)~~ (2023) requires consideration of unavoidable human and environmental impacts. Resource impacts are unavoidable when an impact cannot be avoided even with mitigation strategies.	Minn. R. 7850.4100(M) (2023) requires consideration of unavoidable human and environmental impacts. Resource impacts are unavoidable when an impact cannot be avoided even with mitigation strategies.
Page 103, Recommendation	Segment 2 North, Conductor Segment 2G, and Segment 2 South [referred to in the FEIS as Route Option B].	Segment 2 North, ~~Conductor~~ Connector Segment 2G, and Segment 2 South [referred to in the FEIS as Route Option B].	Segment 2 North, Connector Segment 2G, and Segment 2 South [referred to in the FEIS as Route Option B].

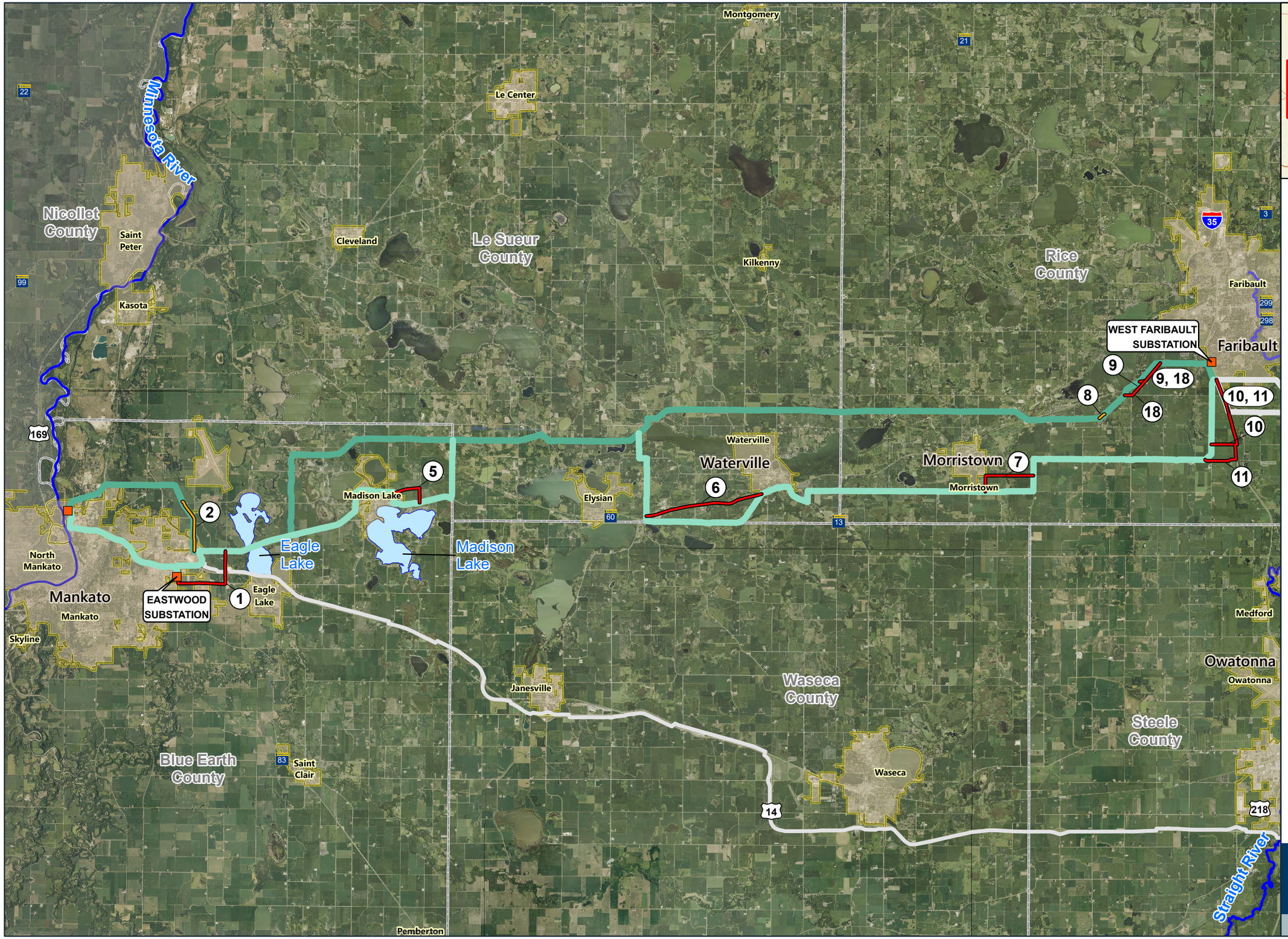
IN THE MATTER OF THE APPLICATION OF XCEL ENERGY FOR A ROUTE PERMIT FOR THE MANKATO TO MISSISSIPPI RIVER 345 KV TRANSMISSION PROJECT IN SOUTHERN MINNESOTA

MPUC DOCKET NO. E002/TL-23-157
CAH DOCKET NO. 65-2500-40099

CERTIFICATE OF SERVICE

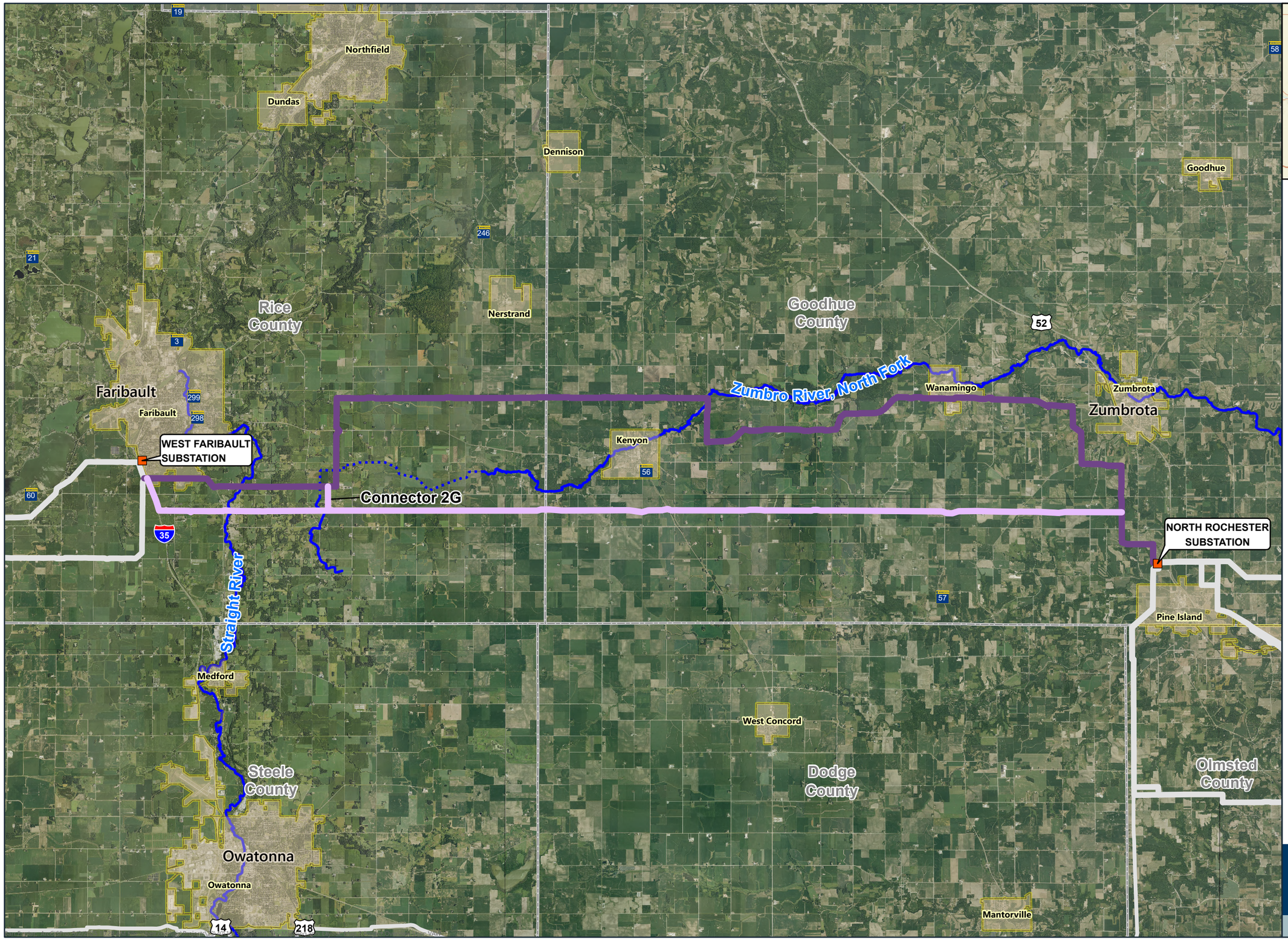
Gustav Gerhardson certifies that on the 14th day of November, 2025, on behalf of Northern States Power Company, doing business as Xcel Energy, he efiled a true and correct copy of the **Exceptions to the Administrative Law Judge's Findings of Fact, Conclusions of Law, and Recommendation** by posting 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.

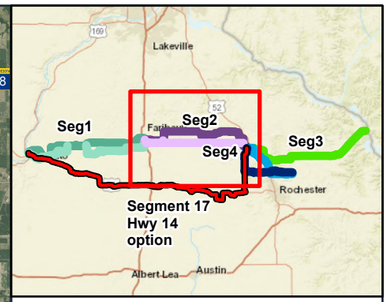
/s/ Gustav Gerhardson
Gustav Gerhardson



PROJECT OVERVIEW
Mankato - Mississippi River Transmission Line Project

Map 2-1



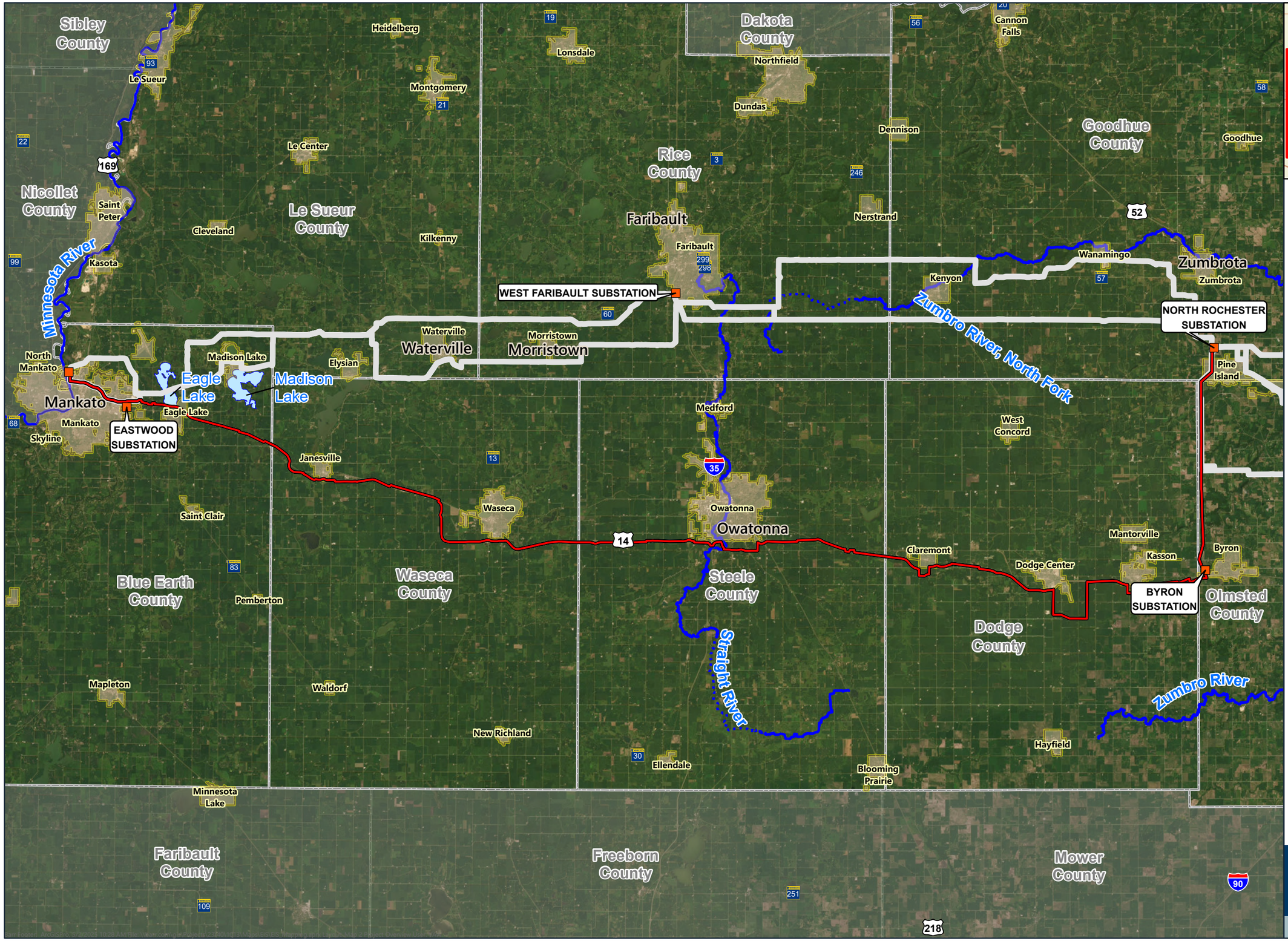


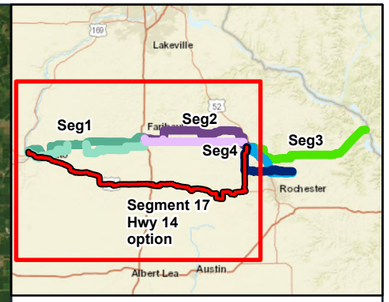
- Segment 2 North
- Segment 2 South
- Other Segments
- Substation
- Public Water Watercourse
- Public Ditch/Altered Natural Watercourse
- Public Waters Basins
- Municipal Boundary
- County Boundary

Miles
0 2.5 5

PROJECT OVERVIEW
Mankato - Mississippi River Transmission Line Project

Map 2-2



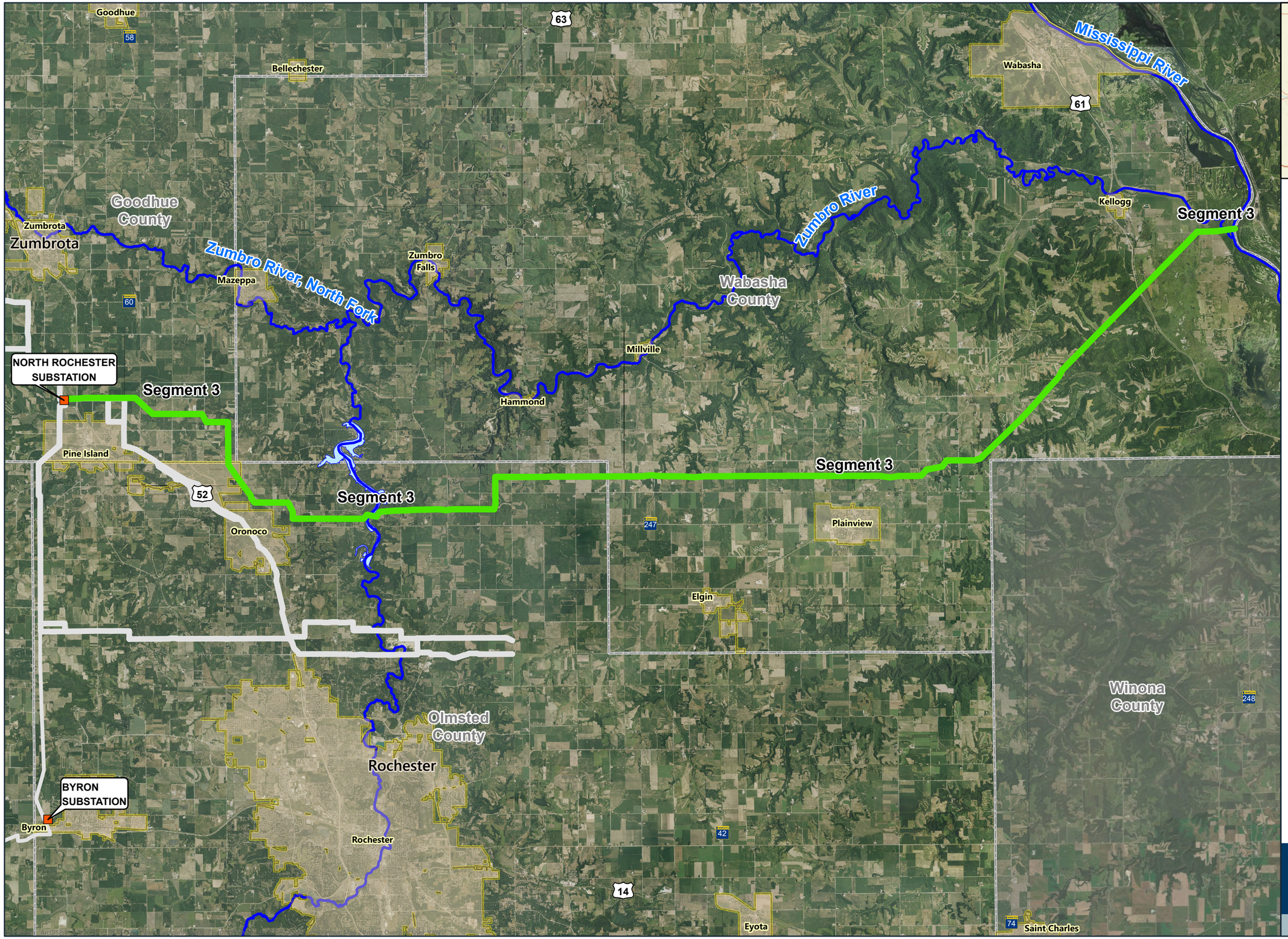


- Route Segment 17 (Hwy 14 Option)
- Other Segments
- Substation
- Public Water Watercourse
- Public Ditch/Altered Natural Watercourse
- Public Waters Basins
- Municipal Boundary
- County Boundary

Miles
0 5 10

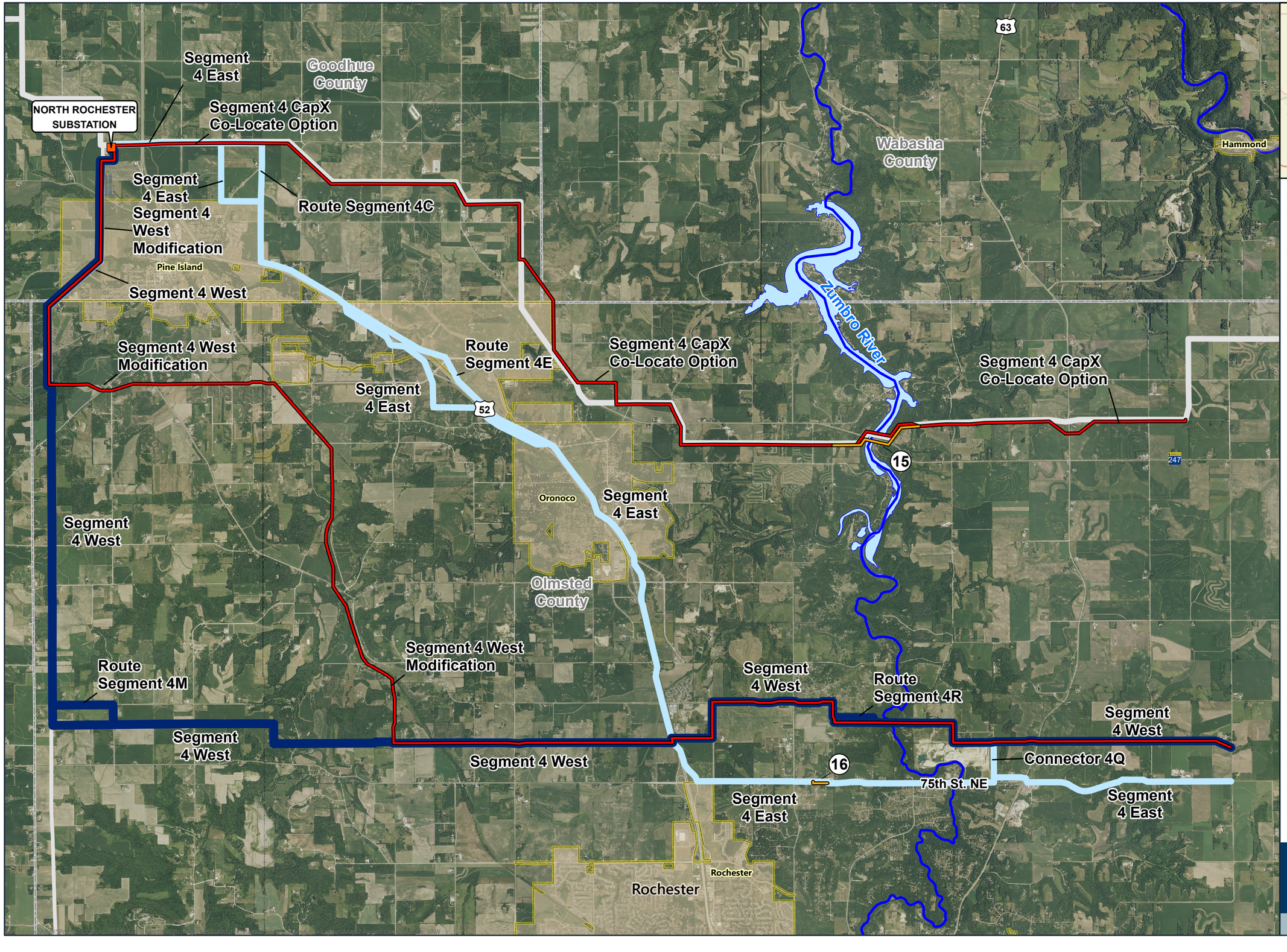
PROJECT OVERVIEW
Mankato - Mississippi River Transmission Line Project

Map 2-3



PROJECT OVERVIEW
Mankato - Mississippi River
Transmission Line Project

Map 2-4



PROJECT OVERVIEW
Mankato - Mississippi River Transmission Line Project

Map 2-5

Item No.	Route Segment	Document Title	eDockets link
1.	Entire route	FEIS - Map 2 Project Overview (Maps 2-1 through 2-5)	118 20257-221376-02 Public.pdf
2.	Segment 1	FEIS - Map 13 Segment 1 Detailed Map Book - Part 1 (Maps 13-1through 13-3)	129 20257-221376-13 Public.pdf
3.	Segment 1	FEIS - Map 13 Segment 1 Detailed Map Book - Part 2 (Maps 13-4 through 13-6)	130 20257-221376-14 Public.pdf
4.	Segment 1	FEIS - Map 13 Segment 1 Detailed Map Book - Part 3 (Maps 13-7 through 13-8)	131 20257-221376-15 Public.pdf
5.	Segment 1	FEIS - Map 13 Segment 1 Detailed Map Book - Part 4 (Maps 13-9 through 13-11)	132 20257-221376-16 Public.pdf
6.	Segment 1	FEIS - Map 13 Segment 1 Detailed Map Book - Part 5 (Maps 13-12 through 13-13)	133 20257-221376-17 Public.pdf
7.	Segment 1	FEIS - Map 13 Segment 1 Detailed Map Book - Part 6 (Maps 13-14 through 13-16)	134 20257-221376-18 Public.pdf
8.	Segment 1	FEIS - Map 13 Segment 1 Detailed Map Book - Part 7 (Maps 13-17 through 13-19)	135 20257-221376-19 Public.pdf
9.	Segment 1	FEIS - Map 13 Segment 1 Detailed Map Book - Part 8 (Maps 13-20 through 13-21)	136 20257-221376-20 Public.pdf
10.	Segment 1	FEIS - Map 13 Segment 1 Detailed Map Book - Part 9 (Maps 13-22 through 13-23)	137 20257-221376-21 Public.pdf
11.	Segment 1	FEIS - Map 13 Segment 1 Detailed Map Book - Part 10 (Maps 13-24 through 13-26)	138 20257-221376-22 Public.pdf
12.	Segment 1	FEIS - Map 13 Segment 1 Detailed Map Book - Part 11 (Maps 13-27 through 13-28)	139 20257-221376-23 Public.pdf
13.	Segment 1	FEIS - Map 13 Segment 1 Detailed Map Book - Part 12 (Maps 13-29 through 13-30)	140 20257-221376-24 Public.pdf
14.	Segment 1	FEIS - Map 13 Segment 1 Detailed Map Book - Part 13 (Maps 13-31 through 13-33)	141 20257-221376-25 Public.pdf
15.	Segment 1	FEIS - Map 13 Segment 1 Detailed Map Book - Part 14 (Map 13-34)	142 20257-221376-26 Public.pdf
16.	Segment 2	FEIS - Map 26 Segment 2 Detailed Map Book Part 1 (Maps 26-1 through 26-5)	28 20257-221382-06 Public.pdf
17.	Segment 2	FEIS - Map 26 Segment 2 Detailed Map Book Part 2 (Maps 26-6 through 26-11)	29 20257-221382-07 Public.pdf
18.	Segment 2	FEIS - Map 26 Segment 2 Detailed Map Book Part 3 (Maps 26-12 through 26-16)	30 20257-221382-08 Public.pdf
19.	Segment 2	FEIS - Map 26 Segment 2 Detailed Map Book Part 4 (Maps 26-17 through 26-19)	31 20257-221382-09 Public.pdf
20.	Segment 2	FEIS - Map 26 Segment 2 Detailed Map Book Part 5 (Maps 26-20 through 26-22)	32 20257-221382-10 Public.pdf
21.	Segment 2	FEIS - Map 26 Segment 2 Detailed Map Book Part 6 (Maps 26-23 through 26-26)	33 20257-221382-11 Public.pdf
22.	Segment 2	FEIS - Map 26 Segment 2 Detailed Map Book Part 7 (Maps 26-27 through 26-30)	34 20257-221382-12 Public.pdf

23.	Segment 3	FEIS - Map 53 Segment 3 Detailed Map Book (Maps 53-1 through 53-17)	69 20257-221383-06 Public.pdf
24.	Segment 4	FEIS - Map 66 Segment 4 Detailed Map Book Part 1 (Maps 66-1 through 66-2)	82 20257-221384-06 Public.pdf
25.	Segment 4	FEIS - Map 66 Segment 4 Detailed Map Book Part 2 (Maps 66-3 through 66-5)	83 20257-221384-07 Public.pdf
26.	Segment 4	FEIS - Map 66 Segment 4 Detailed Map Book Part 3 (Maps 66-6 through 66-9)	84 20257-221384-08 Public.pdf
27.	Segment 4	FEIS - Map 66 Segment 4 Detailed Map Book Part 4 (Maps 66-10 through 66-14)	85 20257-221384-09 Public.pdf
28.	Segment 4	FEIS - Map 66 Segment 4 Detailed Map Book Part 5 (Maps 66-15 through 66-17)	86 20257-221384-10 Public.pdf
29.	Segment 4	FEIS - Map 66 Segment 4 Detailed Map Book Part 6 (Maps 66-18 through 66-22)	87 20257-221384-11 Public.pdf
30.	Segment 4	FEIS - Map 66 Segment 4 Detailed Map Book Part 7 (Maps 66-23 through 66-25)	88 20257-221384-12 Public.pdf
31.	Segment 4	FEIS - Map 66 Segment 4 Detailed Map Book Part 8 (Maps 66-26 through 66-29)	89 20257-221384-13 Public.pdf