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November 24, 2025

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

—Via Electronic Filing—

RE: ROUTE PERMIT AMENDMENT
MINNESOTA ENERGY CONNECTION PROJECT
DOCKET NO. E-002/TL-22-132

Dear Ms. Bergman:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission the enclosed application for an amendment to the Route Permit for the Minnesota Energy Connection Project (Project). The Commission issued the Route Permit to Xcel Energy on June 10, 2025.¹

We request an amendment to the Route Permit as a result of ongoing landowner coordination to amend a portion of the Designated Route to add a new 200-foot-wide route corridor to support a proposed reroute of the current alignment in Redwood County, Minnesota.

We have electronically filed this document with the Minnesota Public Utilities Commission. Copies have been served on parties on the attached service list. Please contact me at andrew.welch@xcelenergy if you have any questions regarding this filing.

Sincerely,

/s/

ANDREW WELCH
SENIOR SITING AND LAND RIGHTS AGENT

Encls
c: Service List

¹ *In the Matter of the Applications of Xcel Energy for a Certificate of Need and Route Permit for the Minnesota Energy Connection Project in Sherburne, Stearns, Kandiyohi, Wright Meeker, Chippewa, Yellow Medicine, Renville, Redwood, and Lyon counties in Minnesota.* Docket No. E-002/CN-22-131; E-002/TL-22-132, ORDER MODIFYING AND ADOPTING ADMINISTRATIVE LAW JUDGE REPORT, GRANTING CERTIFICATE OF NEED, AND ISSUING ROUTE PERMIT FOR THE MINNESOTA ENERGY CONNECTION PROJECT (June 10, 2025).



**ROUTE PERMIT AMENDMENT TO THE MINNESOTA PUBLIC
UTILITIES COMMISSION FOR THE MINNESOTA ENERGY
CONNECTION PROJECT**

*MPUC Docket No.
E-002/TL-22-132*

November 24, 2025

Submitted by
Northern States Power Company

Minnesota Energy Connection Project
November 24, 2025

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1 Introduction

Northern States Power Company, doing business as Xcel Energy (Permittee), submits this request to the Minnesota Public Utilities Commission (Commission) for an amendment to the Route Permit for the Minnesota Energy Connection Project (Project) under Minnesota Statute 216I.09.¹ The Route Permit was issued by the Commission on June 10, 2025.² The Permittee requests an amendment to the Route Permit to amend a portion of the Designated Route to add a new 200-foot-wide route corridor to support a proposed reroute of the current alignment in Redwood County, Minnesota Route). The Proposed Amended Route is shown on Map 1 (see Section 3, below). Xcel Energy is seeking the Proposed Amended Route as a result of ongoing landowner coordination. The proposed amendment will reduce tree clearing and avoid a series of drainage ditches to accommodate the landowner's plans to construct agricultural erosion control berms. Construction of this portion of the Project is anticipated to begin in the fourth quarter of 2026.

A person requesting an amendment to a Route Permit is required to submit an application that describes the amendment sought and the reasons for the amendment.³ The Commission is required to mail notice of receipt of the application to those persons on the general list and to those persons on the project list. The Commission is required to provide at least a ten-day period for interested persons to submit comments on the application or to request that the matter be brought to the Commission for consideration.⁴ After the close of the comment period, the Commission will decide whether to approve the amendment request or to bring the matter to the Commission for consideration.⁵

¹ Prior to the adoption of Minn. Stat. Ch. 216I, route permit amendments were processed under Minn. R. Ch. 7850. This application also includes the same type of information previously included under Minn. R. Ch. 7850.

² *In the Matter of the Applications of Xcel Energy for a Certificate of Need and Route Permit for the Minnesota Energy Connection Project in Sherburne, Stearns, Kandiyohi, Wright Meeker, Chippewa, Yellow Medicine, Renville, Redwood, and Lyon counties in Minnesota*. Docket No. E-002/CN-22-131; E-002/TL-22-132, ORDER MODIFYING AND ADOPTING ADMINISTRATIVE LAW JUDGE REPORT, GRANTING CERTIFICATE OF NEED, AND ISSUING ROUTE PERMIT FOR THE MINNESOTA ENERGY CONNECTION PROJECT (June 10, 2025).

³ Minn. Stat. 216I.09, subd. 2.

⁴ *Id.* at subds. 3-4.

⁵ *Id.* at subd. 6.

2 Description of Route Amendment

2.1 Need for A Proposed Amended Route

Since the Route Permit was issued, Xcel Energy has continued to engage with landowners along the Project's route. Xcel Energy seeks the Proposed Amended Route as a result of that ongoing landowner coordination. During easement discussions with landowners, the Proposed Amended Route was suggested to avoid wetland drainages, avoid shallow agricultural drainage tile outlets and reduce tree clearing, as well as accommodate the landowner's plans to install agricultural erosion control berms along this section of right-of-way. The landowners crossed by the Proposed Amended Route have agreed to the modified route. Xcel Energy, likewise, does not oppose the Proposed Amended Route because it is the same length as the Designated Route, is constructible, and does not increase impacts or costs. As described in Section 3 below, the Proposed Amended Route will not result in any additional impacts to the human and environmental resources not already identified in the route permit application (Application) and the environmental impact statement (EIS).

2.2 Location and Size of Proposed Route Amendment

The Proposed Amended Route is north of Tracy, in Redwood County, Minnesota and is located partially within Sections 17 and 18 of Township 110, Range 39. It includes adding another section approximately 2,595 feet to the south of the Designated Route along a 2.5 mile section on the north side of County Road 4, along a 150-foot-wide right-of-way.

2.3 Land Ownership

The Proposed Amended Route does not impact any new landowners. There are three landowners that would remain within the Project footprint and one landowner for which an easement would no longer be acquired. All landowners who are within the Project footprint have agreed to the Proposed Amended Route.

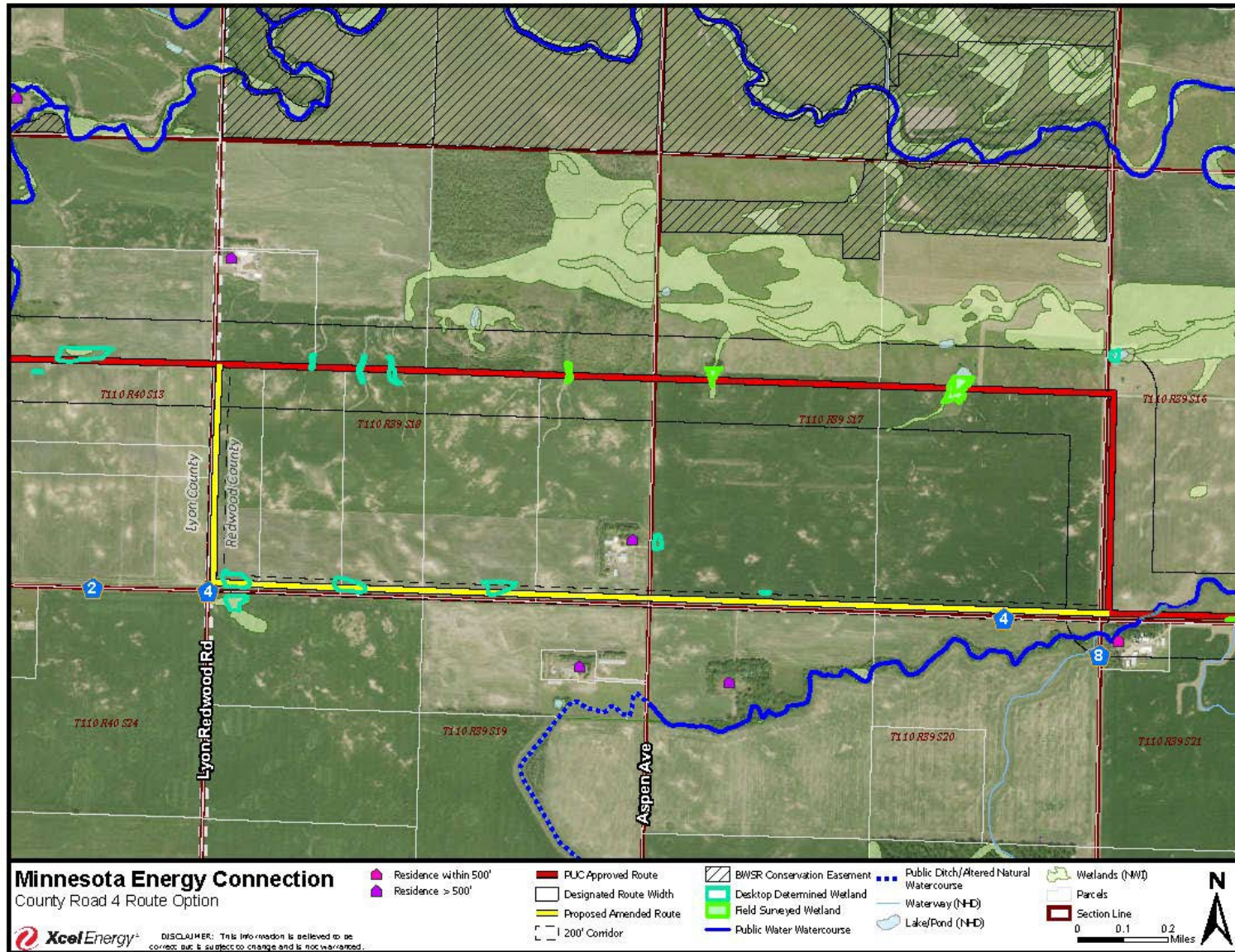
3 Human and Natural Environment

The following subsections provide an analysis of the human and natural resources within the requested route expansion area.

3.1 Aesthetics

The topography of the Proposed Amended Route is generally flat. The landscape consists of agricultural fields, and existing distribution lines. The Proposed Amended Route will not result in any additional aesthetic impacts not already discussed in the Application and the EIS. Passersby on County Road 4 will likely not observe a change to the viewshed resulting from the Project based on the proximity of the Proposed Amended Route to existing distribution line structures.

Map 1 Proposed Amended Route



3.2 Human Settlement - Proximity to Residences

There is one occupied residence that is within 500 feet of the Proposed Amended Route; the residence is also within 500 feet of the Designated Route and the Proposed Amended Route does not change the distance between this residence and the route. Similar to the alignment proposed within the Designated Route, there are no additional residences within 500 feet of the Proposed Amended Route. Therefore, the Proposed Amended Route will not result in displacement of residences or buildings.

3.3 Public Health and Safety - Electromagnetic Fields and Stray Voltage

The term EMF refers to electric and magnetic fields that are present around any electrical device. Electromagnetic fields depend on the voltage (electric fields) and current (magnetic fields) of the transmission line. The intensity of the electric field is proportional to the voltage of the line, while the intensity of the magnetic field is proportional to the current flow along the conductors.

Stray voltage is a natural phenomenon that is the result of low levels of electrical current flowing between two points not directly connected. Stray voltage associated with electrical infrastructure can result from improper grounding.

The Proposed Amended Route does not change the voltage, current or number of proposed transmission lines, and therefore will not result in any additional impacts to EMF or stray voltage not already discussed in the Application and the EIS.

3.4 Audible Noise

The Proposed Amended Route is in an agricultural land use setting. Therefore, existing sources of noise may include frequent agricultural activity and truck traffic/equipment.

The Proposed Amended Route will not result in any additional impacts from noise not already discussed in the Application and EIS. Noise associated with the operation of the Project is not predicted to exceed the limits for the relevant Noise Area Classifications (NAC). The noise modeling indicates that the noise generated by the Project will not exceed the most stringent Minnesota Pollution Control Agency (MPCA) noise standards for NAC-1.

3.5 Environmental Justice

The Proposed Amended Route is not located within areas identified in the MPCA's map as areas of environmental justice concern for people in poverty, people of color, tribal areas, or non-English speakers. Environmental justice impacts would be unchanged from those discussed in the Application and the EIS.

3.6 Cultural Values

Cultural values are formed through environmental adaptations, historical factors, social and economic evolution, and contact with other groups. The Minnesota River Valley is an area of cultural significance for the Upper Sioux Community Pezihutazizi Oyate and Lower Sioux Indian Community.

The Proposed Amended Route is along an agricultural field line and a county road and will not result in additional impacts to cultural values not already discussed in the Application and the EIS.

3.7 Recreation

The Proposed Amended Route does not include crossings of any state or national parks or state scientific and natural areas. Furthermore, the Proposed Amended Route crosses 1.5 miles less of site of biodiversity significance based on the Minnesota Department of Natural Resources (MDNR) and U.S. Fish and Wildlife Service (USFWS) datasets.

3.8 Land Use and Zoning

The Proposed Amended Route is within an active agricultural area, located within Gales Township in Redwood County, and will occur on parcels zoned for agricultural use. The Proposed Amended Route will not result in any additional impacts to land use and zoning not already discussed in the Application and EIS.

3.9 Archeological and Historic Resources

Background research on known cultural resources was conducted in July 2023 by requesting information from the Minnesota State Historic Preservation Office (SHPO) as well as reviewing the Minnesota Office of the State Archaeologist Portal for archaeological sites. Data regarding known cultural resources identified through previous professional cultural resources surveys and reported archaeological sites and historic architectural resources were reviewed. This information was gathered for the

Project Study Area and then refined to determine known archaeological and historic architectural resources within the Designated Route for the Project.

The Permittee coordinated with SHPO⁶ on a Phase I archaeological survey that was conducted during 2024-2025 for areas of the Designated Route and the Proposed Amended Route. No archeological or historic resources were identified when evaluating the Proposed Amended Route area.

The Proposed Amended Route will not result in any additional impacts to archeological or historic resources not already discussed in the Application and the EIS.

3.10 Natural Environment

3.10.1 Air Quality

Potential impacts to air quality are discussed in the Application and the EIS. These emissions generally include dust generated from soil disturbing activities such as earthmoving and wind erosion associated with right-of-way clearing and construction, combustion emissions from construction machinery engines, and indirect emissions attributable to construction workers commuting to and from work sites during construction.

The Proposed Amended Route will not result in any additional impacts to air quality not already discussed in the Application and the EIS.

3.10.2 Water Resources

3.10.2.1 Groundwater

The Proposed Amended Route is within the Arrowhead/Shallow Bedrock Province which is characterized by thin or absent sediments over crystalline bedrock that typically has limited groundwater available for use. According to the Minnesota Department of Health, Minnesota Well Index, there are no wells along the Proposed Amended Route.

The Proposed Amended Route is not anticipated to impact groundwater resources.

⁶ Documentation of the Permittee's coordination with SHPO on final alignment for the Project, eDockets Number [202410-211225-02](#).

3.10.2.2 Surface Water and Wetlands

According to the MDNR Public Water Inventory dataset, there are no streams or rivers along the Proposed Amended Route. A review of the National Wetland Inventory as well as a desktop wetland review confirmed there are three wetland crossings located within the right-of-way of the Proposed Amended Route. The Designated Route has six wetland crossings within the right-of-way; however, the Proposed Amended Route would have a negligible additional impact of 0.3 acre on surface waters and wetlands than what was discussed in the Application and the EIS.

3.10.3 Soils

Soil information for the Designated Route and the Proposed Amended Route was obtained from the U.S. Department of Agriculture (USDA)-Natural Resource Conservation Service (NRCS) Soil Survey Geographic (SSURGO) Database. Soils are described in the Application and the EIS as generally loamy, silty clay loam, sandy loam or clay loam, typically used for agricultural purposes, and range from very poorly drained to well-drained.

The USDA-NRCS SSURGO Database identifies farmland soils based on three categories which are subject to protection under the Farmland Protection Policy Act. These categories include prime farmland, prime farmland when drained, and farmland of statewide importance. Prime farmland is defined by the NRCS as land that has the best combination of physical and chemical characteristics for producing food, feed, forage, fiber, and oilseed crops and is available for these uses. Prime farmland when drained includes soils that have the potential to be prime farmland but require drainage or hydrologic alteration to achieve high productivity. Farmland of statewide importance includes soils that are nearly prime, but are not as productive due to permeability, slope, erosion potential, or some other soil property.

Similar to the Designated Route, there is prime farmland, prime farmland if drained, and/or farmland of statewide importance located along the Proposed Amended Route. The Proposed Amended Route will not result in any additional impacts to soil not already discussed in the Application and the EIS.

3.10.4 Vegetation

The Proposed Amended Route is dominated by agricultural landcover. There are no native plant communities located within the Proposed Amended Route. The

Proposed Amended Route would result in a reduction of 3.2 acres of upland forested clearing from what was described in the Application and EIS.

3.10.5 Wildlife and Habitat

There are no Wildlife Management Areas, National Wildlife Refuges, Waterfowl Production Areas, or State Wildlife Areas located along Proposed Amended Route. There are also no Sites of Biodiversity Significance located along the Proposed Amended Route. Therefore, the Proposed Amended Route will not result in any additional impacts to wildlife habitat not already discussed in the Application and the EIS.

3.10.6 Rare and Unique Resources

Data on federal and state-protected species were reviewed for the Designated Route using the USFWS Information for Planning and Consultation (IPac) online tool, the MDNR Natural Heritage Inventory System (NHIS) database (per MDNR license agreement), and MDNR Conservation Explorer online tool. Although this review does not represent a comprehensive survey, it provides information on the potential for the presence of protected species within the proposed route expansion area. The IPaC query identified the following species as potentially occurring within one mile of the Designated Route: northern long-eared bat (*Myotis septentrionalis*; endangered), tricolored bat (*Perimyotis subflavus*; proposed endangered), monarch butterfly (*Danaus plexippus*; candidate), Prairie Bush Clover (*Lespedeza leptostachya* ; threatened), Poweshiek Skipperling (*Oarisma Poweshiek*; endangered) and whooping crane (*Grus americana*; experimental population, non-essential). The NHIS query identified four endangered and four threatened species, that have been documented within one mile of the Designated Route and are discussed in the Application and the EIS. No additional state or federally listed species were identified within the Proposed Amended Route. The Proposed Amended Route will not result in any additional impacts to rare and unique resources not already discussed in the Application and the EIS.

4 Conclusion

The Proposed Amended Route was reviewed for human and environmental resources and evaluated against the criteria found in Minnesota Statute 216I.05. The Proposed Amended Route will not result in any additional impacts to the human and

environmental resources not already identified in the application and the EIS. The Permittee requests that the Commission grant the proposed route permit amendment to authorize construction of the Project on the Proposed Amended Route.

**In the Matter of the Route Permit
Application for the Minnesota Energy
Connection Project in Sherburne,
Stearns, Kandiyohi, Wright, Meeker,
Chippewa, Yellow Medicine, Renville,
Redwood, and Lyon counties in
Minnesota
MPUC Docket No. E002/TL-22-132**

CERTIFICATE OF SERVICE

Breann L. Jurek certifies that on the 24th day of November 2025, she e-filed on behalf of Northern States Power Company, doing business as Xcel Energy, a true and correct copy of the following documents:

1. Filing Letter;
2. Application of Northern States Power Company doing business as Xcel Energy for a Route Permit Amendment for the Minnesota Energy Connection Project; and
3. Certificate of Service,

with the Minnesota Public Utilities Commission via eDockets (www.edockets.state.mn.us). Said documents were also served on the Official Service Lists of record on file with the Minnesota Public Utilities Commission and as attached hereto.

Executed on: November 24, 2025

Signed: /s/ Breann L. Jurek

Fredrikson & Byron, P.A.
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25	Dawn S	Marsh	dawn_marsh@fws.gov	U.S. Fish & Wildlife Service		Minnesota-Wisconsin Field Offices 4101 American Blvd E Bloomington MN, 55425 United States	Electronic Service		No	22-132Official

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27	Carol A.	Overland	overland@legalelectric.org		Legalelectric - Overland Law Office	1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	22-132Official
28	Stephen	Rakow	stephen.rakow@state.mn.us		Department of Commerce	Suite 280 85 Seventh Place East St. Paul MN, 55101-2198 United States	Electronic Service		No	22-132Official
29	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	22-132Official
30	Stephan	Roos	stephan.roos@state.mn.us		Minnesota Department of Agriculture	625 Robert St N Saint Paul MN, 55155-2538 United States	Electronic Service		No	22-132Official
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