

Staff Briefing Papers

Meeting Date: April 10, 2025

Agenda Item: **2

Company: Northern States Power Company d/b/a Xcel Energy

Docket: E-002/CN-22-131 and E-002/TL-22-132

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.

- 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 Minnesota Energy Connection Project?
 - Should the Commission grant a route permit for Xcel Energy's Minnesota Energy Connection Project?

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✓ **Relevant Documents**

Date

The attached materials are work papers of the Commission Staff. They are intended for use by the Public Utilities Commission and are based upon information already in the record unless noted otherwise.

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Order Approving Notice Plan Petition and Approving Exemptions from Certain Certificate of Need Application Content Requirements	CN-22-131	06/20/2022
Application to the Minnesota Public Utilities Commission for a Certificate of Need for the Minnesota Energy Connection Project (5 parts)	CN-22-131	03/09/2023
Northern States Power Company 2022 RFI Independent Expert Report	CN-22-131	03/10/2023
Order Accepting Xcel Energy's Certificate of Need Application as Complete, as Supplemented by its Reply Comments and Authorizing use of the Informal Review Process	CN-22-131	05/02/2023
Revised Application to the Minnesota Public Utilities Commission for a Certificate of Need for the Minnesota Energy Connection Project (4 parts)	CN-22-131	05/18/2023
Order Authorizing Joint Review (CN-22-131)	CN-22-131	08/10/2023
Application to the Minnesota Public Utilities Commission for a Route Permit for the Minnesota Energy Connection Project (43 parts, one part is Trade Secret)	TL-22-132	10/30/2023
Sample High-Voltage Transmission Line Route Permit	TL-22-132	01/04/2024
Order Accepting Application as Complete and Establishing Procedural Requirements	TL-22-132	01/16/2024
Notice of and Order for Hearing	TL-22-132	01/24/2024
Order Adopting System Alternatives and Route Alternatives Recommended by Department of Commerce Energy Environmental Review and Analysis (2 parts)	TL-22-132 CN-22-131	05/09/2024
Environmental Impact Statement Scoping Decision (2 parts)	TL-22-132 CN-22-131	05/14/2024
Jason and Lori Pierskalla Initial Comments on Merits of Certificate of Need	CN-22-131	06/06/2024

Jordan Junkermeier Initial Comments on Merits of Certificate of Need	CN-22-131	06/28/2024
Kellie Rosenow Initial Comments on Merits of Certificate of Need	CN-22-131	08/21/2024
Xcel Energy Direct Testimony of Jason Standing	TL-22-132	09/06/2024
Xcel Energy Direct Testimony of Joseph Samuel	TL-22-132	09/06/2024
Xcel Energy Direct Testimony of Matthew Langan	TL-22-132	09/06/2024
LIUNA Minnesota and North Dakota Initial Comments on Merits of Certificate of Need	CN-22-131	09/06/2024
NoCapX 2020 Initial Comments on Merits of Certificate of Need	CN-22-131	09/06/2024
Minnesota Department of Commerce Division of Energy Resources Initial Comments on Merits of Certificate of Need	CN-22-131	09/06/2024
Xcel Energy Initial Comments on Merits of Certificate of Need (2 parts)	CN-22-131	09/06/2024
Joint Commenters Initial Comments on Merits of Certificate of Need (2 parts)	CN-22-131	09/06/2024
Clean Energy Economy Minnesota Initial Comments on Merits of Certificate of Need	CN-22-131	09/06/2024
Nathan and Kelsey Pilgram Reply Comments on Merits of Certificate of Need	CN-22-131	09/09/2024
Anna Donnay Reply Comments on Merits of Certificate of Need	CN-22-131	09/09/2024
Lisa Dallenbach Reply Comments on Merits of Certificate of Need	CN-22-131	09/10/2024
Kevin and Erin Donnay Reply Comments on Merits of Certificate of Need	CN-22-131	09/11/2024

International Brotherhood of Electrical Workers Reply Comments on Merits of Certificate of Need	CN-22-131	10/08/2024
Xcel Energy Reply Comments on Merits of Certificate of Need (2 parts)	CN-22-131	10/08/2024
Operating Engineers Local 49 and North Central States Regional Council of Carpenters Reply Comments on Merits of Certificate of Need	CN-22-131	10/08/2024
Minnesota Department of Commerce Division of Energy Resources Reply Comments on Merits of Certificate of Need	CN-22-131	10/08/2024
Draft Environmental Impact Statement (51 parts)	TL-22-132 CN-22-131	10/08/2024
Xcel Energy Surrebuttal Testimony of Joseph Samuel	TL-22-132	10/22/2024
Xcel Energy Surrebuttal Testimony of Matthew Langan	TL-22-132	10/22/2024
Xcel Energy Supplemental Comments on Merits of Certificate of Need	CN-22-131	10/22/2024
LIUNA Minnesota and North Dakota Supplemental Comments on Merits of Certificate of Need	CN-22-131	10/22/2024
Xcel Energy Comments on Draft Environmental Impact Statement	TL-22-132 CN-22-131	11/25/2024
Minnesota Department of Natural Resources Comments on Draft Environmental Impact Statement (3 parts)	TL-22-132	11/26/2024
Xcel Energy Response to Hearing Comments	TL-22-132 CN-22-131	12/13/2024
Xcel Energy Post Hearing Brief	TL-22-132 CN-22-131	12/13/2024
Xcel Energy Proposed Findings of Fact, Conclusions of Law, and Recommendations	TL-22-132 CN-22-131	12/13/2024
Minnesota Department of Commerce Energy Environmental Review and Analysis Letter	TL-22-132	12/23/2024

Final Environmental Impact Statement (13 parts)	TL-22-132 CN-22-131	01/22/2025
Minnesota Department of Commerce Energy Environmental Review and Analysis Comments and Recommendations	TL-22-132	01/29/2025
Xcel Energy Updated Proposed Findings of Fact, Conclusions of Law, and Recommendations	TL-22-132 CN-22-131	01/29/2025
Administrative Law Judge Proposed Findings of Fact, Conclusions of Law, and Recommendations	TL-22-132 CN-22-131	02/05/2025
Xcel Energy Exceptions	TL-22-132 CN-22-131	02/20/2025
Minnesota Department of Commerce Energy Environmental Review and Analysis Exceptions	TL-22-132 CN-22-131	02/20/2025
Notice of Comment Period	TL-22-132	03/14/2025
Brian Greenslit Comment Letter	TL-22-132	03/17/2025
Xcel Energy Response to Notice	TL-22-132	03/20/2025
Lower Sioux Indian Community Response to Notice	TL-22-132	03/20/2025
Birch Coulee Response to Notice	TL-22-132	03/24/2025
Xcel Energy Reply Comments	TL-22-132	03/24/2025

Attachment A – Written Comments Received During Public Hearing Process

Attachment B – Informational Maps 1-4

Attachment C – Detailed Maps of Alternative Route Segments

Attachment D – Proposed Permit Language (Table 1) and Exceptions to ALJ Report (Table 2)

Attachment E – Draft Route Permit and Draft Route Maps

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 Minnesota Energy Connection Project?
- Should the Commission grant a route permit for Xcel Energy's Minnesota Energy Connection Project?

PROJECT BACKGROUND

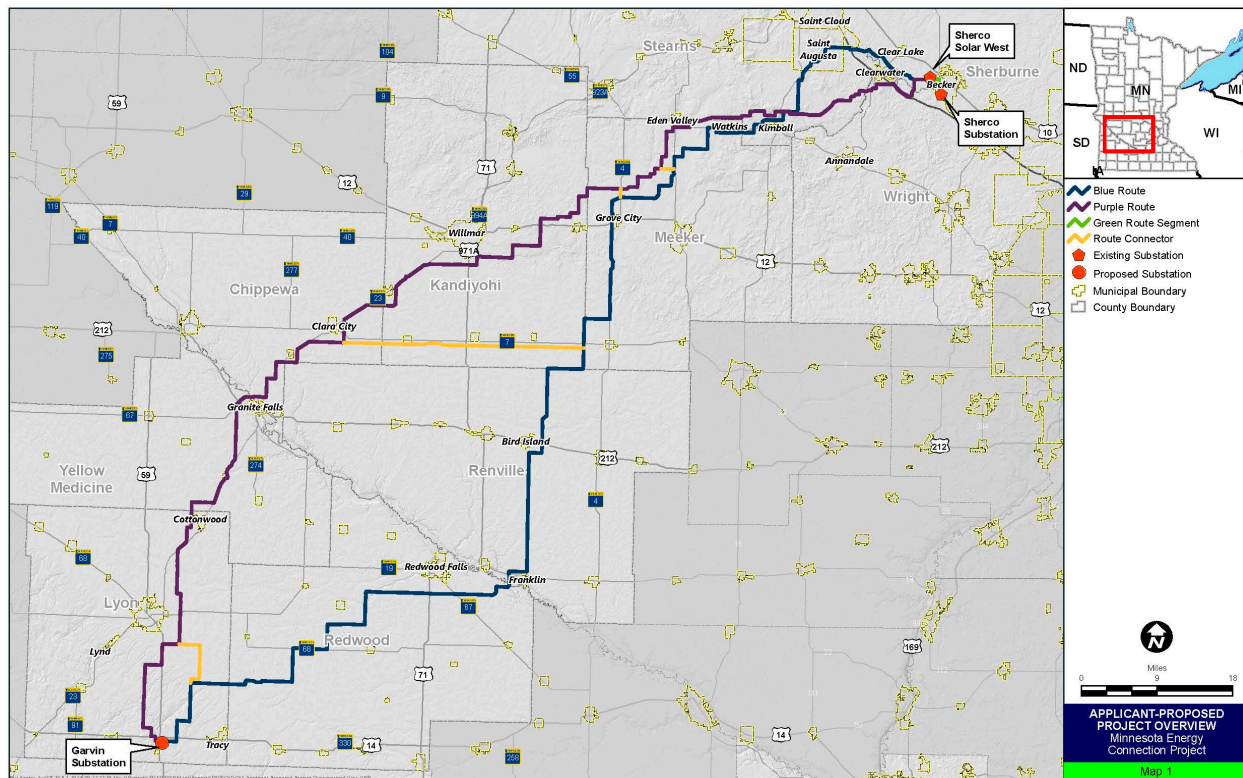
Northern States Power Company d/b/a Xcel Energy (Xcel Energy) has applied to the Minnesota Public Utilities Commission (Commission) for a route permit to construct the Minnesota Energy Connection Project (MNEC Project), a new approximately 171- to 174-mile 345-kilovolt (kV) double-circuit transmission line between Sherburne and Lyon counties. The MNEC Project includes the following components:

- A new 345-kV double-circuit transmission line between the existing Sherco Substation in the city of Becker in Sherburne County and a new substation (Garvin Substation) proposed near the city of Garvin in Lyon County. In its application, Xcel Energy proposed two route alternatives: a Purple Route, which is 171 miles in length, and a Blue Route, which is 174 miles in length. Xcel Energy also proposed four connector segments (yellow routes) to provide options to utilize different portions of each alternative route, as appropriate.
- A new 3.1-mile single-circuit 345-kV transmission line co-located on existing structures between the existing Sherco and Sherco Solar West substations in the city of Becker (Green Route).
- Modifications to the existing Sherco and Sherco Solar West substations, a new voltage-support substation, and a new intermediate substation.

Xcel Energy has requested a route width of 1,000 feet and a final right-of-way width of 150 feet, with the exception of the areas around the substations and conservation easements where the route width would range from 0.3 mile to 1.25 miles to enable flexibility in routing.

The MNEC Project is a result of Xcel Energy's Commission-approved 2020-2034 Upper Midwest Integrated Resource Plan.¹

Project Overview



Source: Final EIS, Map 1 (January 22, 2025)

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 MNEC 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 200 kV and a length greater than 1,500 feet.³

¹ In the Matter of the 2020-2034 Upper Midwest Integrated Resource Plan of Northern States Power Company d/b/a Xcel Energy, Docket E-002/RP-19-368.

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 MNEC Project requires a route permit because it meets the definition of a high-voltage transmission line, as it is a transmission line with a capacity greater than 100 kV and a length greater than 1,500 feet.⁵

In deciding whether to issue a 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 7850.5600.

D. Procedural Treatment of Applications

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

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

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 June 28, 2022, 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 March 9, 2023, Xcel filed a certificate of need application for the MNEC Project.

On May 2, 2023, the Commission issued an order that accepted Xcel Energy's certificate of need application as complete as supplemented by its April 12, 2023 Reply Comments, and authorized the use of informal proceedings for developing the record.

On May 18, 2023, Xcel Energy filed a revised certificate of need application that included the updated Chapter 8 and Appendix E that were part of its April 12, 2023 Reply Comments.

On August 10, 2023, the Commission, recognizing that separate and overlapping application review processes for the same project may create administrative inefficiencies and confusion for the public, issued an order suspending review of the certificate of need application, pending receipt of a route permit application, and directing joint proceedings to be held on the two applications.

On October 30, 2023, Xcel Energy filed a route permit application for the MNEC Project.

On January 16, 2024, the Commission issued its Order Accepting [the Route Permit] Application as Complete and Establishing Procedural Requirements. In addition to the application completeness determination, the order reaffirmed the approval of joint proceedings and combined environmental review with the certificate of need application and denied the request to establish an advisory task force.

⁷ Minn. Stat. § 216E.03 and Minn. R. 7850.1700 to 7850.2700

⁸ Minn. R. 7849.1900, subp. 1

On January 24, 2024, the Commission issued its Notice of and Order for Hearing, which referred the route permit application to the Office of Administrative Hearings (OAH) for contested case proceedings.

Between January 24 and January 31, 2024, public information and EIS scoping meetings were held in each of the following cities: Granite Falls, Marshall, Olivia, Redwood Falls, Litchfield, Monticello, and Kimball. An online public information and EIS scoping meeting was held on February 1, 2024. A written comment period was open through February 21, 2024, to receive comments on the scope of the EIS.

On May 9, 2024, the Commission issued an order that adopted the recommendations of the Minnesota Department of Commerce Energy Environmental Review and Analysis Unit (DOC EERA) as outlined in its Comments and Recommendations on the EIS Scoping Decision dated April 17, 2024. In addition to the routes proposed by Xcel Energy in its route permit application, the Commission authorized evaluation of 48 route segments, 11 route connectors, and four alignment alternatives received during the EIS scoping period. Further, as it applied to the certificate of need application, the Commission authorized the evaluation of the following system alternatives: no-build, continued coal generation at Sherco, modified generation (solar and wind) at Sherco, Modified generation (nuclear and natural gas) at Sherco, generation alternatives closer to Sherco, distributed solar generation, and undergrounding of the transmission line.

On June 5, 2024, 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 September 6, 2024, a reply comment deadline of October 8, 2024, and a supplemental comment deadline of October 22, 2024.

By September 6, 2024, initial comments on the certificate of need application were filed by Xcel Energy, the Minnesota Department of Commerce Division of Energy Resources (DOC DER), LIUNA Minnesota and North Dakota (LIUNA), The Joint Commenters⁹, Clean Energy Economy Minnesota (CEEM), NoCapX 2020, Jordan Junkermeier, Kellie Rosenow and the Pierskallas.

Also on September 6, 2024, Xcel Energy filed the Direct Testimony and Schedules of Matthew Langan, Jason Standing, and Joseph Samuel. The Direct Testimony of Matthew Langan indicated a description and maps of Xcel's preferred Modified Blue Route.

By October 8, 2024, reply comments on the certificate of need application were filed by Xcel Energy, DOC DER, Operating Engineers Local 49 and North Central States Regional Council of

⁹ The Joint Commenters include Citizens Utility Board of Minnesota (CUB), Fresh Energy, Minnesota Center for Environmental Advocacy (MCEA), Center for Rural Affairs, and the Clean Grid Alliance.

Carpenters (Local 49-Carpenters), International Brotherhood of Electrical Workers (IBEW), Anna Donnay, Lisa Dallenbach, the Pilgrims, and the Donnays.

Also, on October 8, 2024, DOC EERA filed the Draft EIS.

On October 22, 2024, Xcel Energy filed the Surrebuttal Testimony and Schedules of Matthew Langan and Joseph Samuel.

Also, on October 22, 2024, supplemental comments on the certificate of need application were filed by Xcel Energy and LIUNA.

Between October 29 and November 12, 2024, Administrative Law Judge (ALJ) Suzanne Todnem presided over public and evidentiary hearings to receive public input on the certificate of need and route permit applications and the draft EIS. The hearings included one online public hearing via WebEx, seven in-person public hearings in the following cities: Monticello, Litchfield, Kimball, Granite Falls, Olivia, Marshall, and Redwood Falls, and an evidentiary hearing in the Commission's Large Hearing Room. The in-person public 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 November 25, 2024.

On November 25, 2024, Xcel Energy filed its comments on the Draft EIS.

On December 13, 2024, Xcel Energy filed its Response to Hearing Comments; Post-Hearing Brief; and Proposed Findings of Fact, Conclusions of Law, and Recommendations.

On January 22, 2025, DOC EERA filed the Final EIS.

On January 29, 2025, Xcel Energy filed its Updated Findings of Fact, Conclusions of Law, and Recommendations and DOC EERA filed its Comments and Recommendations.

On February 5, 2025, ALJ, Suzanne Todnem filed her Findings of Fact, Conclusions of Law, and Recommendations (ALJ Report).

On February 20, 2025, DOC EERA and Xcel Energy filed exceptions to the ALJ Report.

On March 14, 2025, the Commission issued a Notice of Comment Period requesting information on the technical feasibility, reliability, and cost associated with possible route reconfigurations related to existing 69 kV lines and the Minnesota River crossing along Xcel Energy's Modified Blue Route in the Franklin, Minnesota area.

By March 24, 2025, comments were received from Xcel Energy, Lower Sioux Indian Community, and Birch Coulee Solar.

CERTIFICATE OF NEED APPLICATION

As previously noted, the MNEC Project is a result of Xcel Energy's Commission-approved 2020-2034 Upper Midwest Integrated Resource Plan. The Commission, in its April 15, 2022, Order Approving Plan with Modifications and Establishing Requirements for Future Filings instructed Xcel Energy to "begin Certificate of Need and route permit proceedings for transmission lines with a capacity of 345 kilovolts extending from the locations of the retiring King and Sherco generators designed to permit new energy resources to connect to the transmission grid of the Midcontinent Independent System Operator, Inc [MISO]." ¹⁰

According to Xcel in its certificate of need application, the proposed MNEC Project would allow it to retain and reuse the approximately 2,000 megawatts (MW) of transmission interconnection rights at the Sherco Substation under a Federal Energy Regulatory Commission (FERC) Electric Tariff as part of its energy transition from carbon-based fuels to renewable energy.

E. Commenter Positions Concerning Certificate of Need

As previously indicated, 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 June 5, 2024, requesting initial, reply, and supplementary comments over a period of approximately 20 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 comments on the certificate of need application from Xcel Energy, DOC DER, LIUNA, NoCapX 2020, The Joint Commenters, CEEM, IBEW, and Local 49-Carpenters. Comments on the certificate of need application were also received from the following landowners: Jason and Lori Pierskalla, Jordan Junkermeier, Kellie Rosenow, Nathan and Kelsey Pilgram, Anna Donnay, Lisa Dallenbach, and Kevin and Erin Donnay. In addition, the administrative law judge provided findings, conclusions, and a recommendation regarding the certificate of need application.

¹⁰ Order Approving Plan with Modifications and Establishing Requirements for Future Filings (April 15, 2022), Docket E-002/RP-19-368.

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 has recommended that the Commission grant a certificate of need for the MNEC Project if after considering the EIS, the Commission determines the Project “will provide benefits to society in a manner compatible with protecting the natural and socioeconomic environments, including human health.”

a. Statutory Criteria

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. However, commissioners are encouraged to review DOC DER's comments and recommendations for greater detail and explanation.¹¹

Concerning Minn. R. 7849.0120 A¹² and its subparts, DOC DER concluded:

- Xcel Energy's resource needs likely surpass the proposed Project's capability, even under lower demand forecasts.
- Existing and expected energy efficiency and demand response programs would not significantly impact the overall need for reusing the Sherco interconnection.
- Promotional practices did not influence the claimed need for the proposed Project.
- Current and planned facilities without a certificate of need cannot adequately meet the identified need.
- The proposed Project allows efficient use of existing interconnection rights and Minnesota's renewable energy resources.

Concerning Minn. R. 7849.0120 B¹³ and its subparts, DOC DER concluded:

¹¹ Minnesota Department of Commerce Division of Energy Resources, Initial Comments (September 6, 2024) and Reply Comments (October 8, 2024).

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.

- The proposed double-circuit 345 kV transmission line is the most cost-effective and technically feasible solution compared to other alternatives (e.g., different voltage transmission lines, high-voltage direct current lines, or underground lines).
- A comprehensive analysis of 10 options and two sub-options determined that a 345 kV transmission line with voltage support technology is the most realistic and cost-effective choice.
- The proposed Project significantly contributes to carbon dioxide (CO₂) reduction when combined with the approved Resource Plan.
- Compared to other alternatives, the proposed Project provides greater capacity at a lower cost.

Concerning Minn. R. 7849.0120 C¹⁴ and its subparts, DOC DER concluded:

- The proposed Project facilitates interconnection of renewable energy sources replacing retiring coal units at the Sherco Substation, which aligns with Minnesota's statutory renewable energy goals.
- Without the proposed Project, Xcel Energy would face challenges in maintaining reliable and cost-effective service.

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

Concerning Minn. R. 7849.0120 D¹⁵, 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

DOC DER concluded that the proposed Project meets the other relevant statutory requirements under chapter 216B or is exempt from them where they do not apply.¹⁶ Staff provides a brief

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.

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.

¹⁶ Minnesota Statutes §§ 216B.243, subd. 3 (9); 216B.243, subd. 3a; 216B.2422, subd. 4; 216B.2426; 216B.169; 216B.1694, subd. 2 (a) (4); 216B.243, subd. 3 (10); 216B.243, subd. 3 (12); 216H.03, subd. 3; 216B.2422, subd. 4a; and 216B.2422, subd. 4b.

summary of DOC DER's conclusions below but recommends commissioners review DOC DER's comments and recommendations for greater detail and explanation:

- **Transmission System Robustness.** The proposed Project is expected to provide substantial benefits by improving access, deliverability, and overall robustness of the transmission system.
- **Renewable Energy Preference.** The proposed Project would enable the reuse of interconnection rights and facilitate greater renewable energy generation; renewable energy generation alone is not a viable alternative.
- **Distributed Generation.** There would be no significant impacts from distributed generation over the proposed Project.
- **Innovative Energy Project Preference.** Since the proposed Project is a transmission line rather than a generating facility and will not directly result in building or expanding a fossil-fuel generation facility, this does not apply.
- **Renewable Energy Standard Compliance.** Xcel Energy has met the 2021 requirements, and projections indicate compliance through 2040, fulfilling statutory obligations.
- **Environmental Cost Planning.** This requirement is not applicable as the proposed Project is a transmission line, not a generating facility.
- **Statewide Power Sector Carbon Dioxide Emissions.** The Commission has previously deemed this requirement is no longer applicable due to existing state laws limiting emissions.
- **Local Job Impacts.** Xcel Energy has committed to working with local communities to enhance socioeconomic benefits and the proposed Project requires minimal long-term workforce commitments.
- **Domestic Content Preference & Inflation Reduction Act Compliance.** These primarily apply to generation projects, not transmission projects. Nonetheless, Xcel Energy has demonstrated efforts to maximize benefits under the Inflation Reduction Act.

c. Recommended Certificate of Need Conditions

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

1. Provide a final number or cap amount within 60 days of the Commission's Order determining the route.
2. Wait until the first scheduled rate case after the proposed Project is placed in-service to recover any cost overruns from Minnesota ratepayers.
3. Justify fully the reasonableness of recovering any cost overruns of the proposed Project from Minnesota ratepayers.

4. Require Xcel Energy to provide updates regarding the composition of voltage support equipment (*i.e.*, static synchronous compensators (STATCOMs) versus interconnected solar facilities) after resource determinations have been made.

2. Xcel Energy

Xcel Energy maintained its request for the Commission to grant a Certificate of Need for the proposed MNEC Project.

a. Cost Cap Language

Xcel Energy proposed the following in anticipation of conditions being applied to a Certificate of Need decision, which are similar to what DOC DER has recommended and what was required in the recent Northland Reliability 345 kV Transmission Line docket:

1. Provide a final number or cap amount within 90 days of the Commission's Order determining the route
2. Wait until the first scheduled rate case after the proposed Project is placed in-service to recover any cost overruns from Minnesota ratepayers.
3. Justify fully the reasonableness of recovering any cost overruns of the proposed 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.¹⁷

Staff notes the primary difference between DOC DER's recommendation and that of Xcel Energy is the number of days allowed to provide a final number or cap amount (90 days versus 60 days) and more detail regarding justification of recovering cost overruns.

DOC DER Reply Comments Regarding Cost Cap Language

DOC DER agreed with Xcel Energy's recommended cost cap language, including the requested 90 days.

¹⁷ Xcel Energy identified additional similar language to Item 3 in its exception to the ALJ Report that staff believe is captured in these conditions and therefore is not necessary.

b. Revised Project Timeline

Xcel Energy provided updates on the anticipated in-service date for the proposed Project, pending Commission approvals. Xcel Energy indicated that the original in-service date of Q3 2027 for the MNEC Project has been revised and extended to Q3 2028 (approximately 11-12 months). Xcel Energy explained that the delay is primarily due to permitting requirements from the U.S. Army Corps of Engineers (USACE), necessitating field surveys rather than desktop data. Xcel Energy indicated the delay would not impact retirement schedules, interconnecting projects, or the ability to meet near-term energy demands. Xcel Energy also indicated that the delay would allow more time for voluntary land acquisition related to the MNEC Project.

DOC DER Reply Comments Regarding Timeline

Because the stated need for the proposed Project is to interconnect new generation to the existing Sherco substation that must be done on or before 2029 per MISO Rules, DOC DER concluded that the revised timing of the project (Q3 2028) is reasonable, as it still aligns with the MISO's retirement timeline.

c. Revised Project Cost

Xcel Energy also provided proposed Project cost updates indicating that the cost increased due to the in-service date delay and the need for additional synchronous condensers. The estimated total cost increased from \$1.139 billion to between \$1.274 billion and \$1.302 billion, depending on the selected route.

DOC DER Reply Comments Regarding Cost

DOC DER maintained that the practice of including cost caps in certificate of need proceedings is working as is demonstrated in this docket. DOC DER did not find that the increase cost would change its analysis with regards to any alternatives, specifically a 500 kV alternative.

3. CEEM, The Joint Commenters, LIUNA, IBEW, Local 49-Carpenters

CEEM recommended that the Commission approve the Certificate of Need for MNEC Project stating that the Project would enhance Minnesota's transmission infrastructure, ensure energy reliability, and accelerate the transition to a decarbonized electricity grid. CEEM also stressed the importance of ongoing oversight to maximize transmission efficiency and optimize clean renewable energy access.

The Joint Commenters recommended that the Commission grant a certificate of need, as the Project aligns with Minnesota's clean energy policies, enhances energy reliability, facilitates the transition to clean energy, provides economic benefits, and complies with regulatory

requirements. The Joint Commenters cautioned that denial of the proposed Project could result in a delay in fossil fuel retirements and loss of interconnection rights.

LIUNA, IBEW, and Local 49-Carpenters indicated support for the Project for reasons similar to those identified by CEEM and The Joint Commenters and recommended that the Commission approve the Project. As part of the approval, LIUNA specifically recommended that the Commission require labor statistics reporting for the MNEC Project.

4. NoCapX 2020

NoCapX 2020 recommended that the Commission reject the Certificate of Need because the Project is unnecessary, oversized, and imposes undue costs on the public. Nevertheless, NoCapX2020 did not offer any expert analysis or discussion of its claims, or of reasonable alternatives that could maximize the existing connection rights or provide the substantial quantities of new renewable generation needed to avoid constructing the proposed Project. Additionally, NoCapX2020 did not address how one of the several referenced existing transmission lines in its letter could address the stated need for the proposed Project.

5. Landowner Comments

All comments received from concerned landowners on the certificate of need application recommended the Commission deny the Certificate of Need. General sentiments were that there are alternatives to renewable energy sources such as coal, natural gas, and nuclear power that exist, and that wind and solar are unreliable and inefficient. Additionally, that there are alternatives to supplying energy to the Twin Cities metro area other than the proposed Project, where several commenters assert the Project's energy baseload is located.

The majority of comments about the certificate of need 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; and impacts to agricultural operations.

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.

ROUTE PERMIT APPLICATION

In its Route Permit Application, Xcel Energy originally proposed two routes for the 345 kV double-circuit MNEC Project: the Purple Route, which is approximately 171 miles in length, and the Blue Route, which is approximately 174 miles in length. Both the Purple and Blue routes would include the Green Route, which is a new 3.1-mile single-circuit 345-kV transmission line that would connect to the existing Sherco and Sherco Solar West substations, as well as construction of a new terminal substation, voltage support substation, and intermediate substations. Four connector segments (yellow routes) were also proposed to provide options to utilize different portions of the Purple and Blue routes, as appropriate. (See Attachment B, Map 1).

In addition to the Purple, Blue, Green and Yellow (connector) routes proposed by Xcel Energy, the EIS evaluated the following alternative route segments and alignments:¹⁸

- 48 alternative route segments (numbered 201 to 248);
- 11 route connector segments (numbered 101 to 115); and
- 4 alignment alternatives (numbered AA1 to AA4)

The EIS further divided the proposed routes and alternatives into seven Project Regions with comparable route segments and developed two additional complete routes for the purpose of like-for-like comparisons because the Commission is required to select a complete route.¹⁹ The Project Regions and complete routes are listed below and shown on Map 2 in Attachment B.

- Region A (Lyon): Route Segments A1 to A8
- Region B (Lyon, Yellow Medicine, Chippewa, Redwood, and Renville): Route Segments B1 to B4
- Region C (Chippewa, Kandiyohi, Renville, and Meeker): Route Segments: C1 to C4
- Region D (Meeker): Route Segments: D1 to D7
- Region E (Meeker and Stearns): Route Segments: E1 and E2
- Region F (Stearns): Route Segments: F1 to F8
- Region G (Stearns, Sherburne, and Wright): Route Segments: G1 to G6

- Complete Route C
- Complete Route D

In general, the analysis in the Final EIS concluded that there are relatively small differences between the available route options when considering the routing factors. When viewed as a

¹⁸ See Attachment C for a key and detailed maps showing each alternative route segment.

¹⁹ See Final EIS at page 477, Appendix Q, and Maps 20-1 and 20-2.

whole, staff finds that the Final EIS's analyses suggests that the proposed Blue Route marginally outperforms the Purple Route, the DNR Route (discussed below), and other potential alternative combinations in areas such as impacts to water resources, conservation easements, sharing/paralleling opportunities, and impacts to residential structures, and cost.²⁰ The Blue Route is further enhanced by the alternative routes Xcel Energy incorporated for its Modified Blue Route, as described below. The Xcel Modified Blue Route, DOC EERA Route, and DNR Route are presented on Map 3 in Attachment B.

F. Xcel Energy's Modified Blue Route

In the Direct Testimony and Schedule of Matthew Langan, Xcel Energy indicated that through information received during the review process and the use of the routes included for evaluation in the EIS, it had identified a preferred route (hereafter, Modified Blue Route). The Modified Blue Route is approximately 178 miles long and primarily uses the original Blue Route and Green Route modified by route alternatives 202, 212, 216, 219, 226, and 244. Xcel Energy maintained that the original Blue Route was already the least impactful of the routes and that the inclusion of the six route alternatives further reduced impacts to: native plant communities, sites of biodiversity, forested upland, forested wetland, public waters, agriculture, and improved crossings of the Mississippi and Cottonwood rivers.

G. DOC EERA Route Recommendations

In its January 29, 2025, comments and recommendations, DOC EERA recommended that the Commission grant a route permit for Xcel Energy's Modified Blue Route with certain modifications. DOC EERA also agreed with Xcel Energy's proposed modifications to the Sample Route Permit.

H. Minnesota Department of Natural Resources Route Recommendations

In its November 26, 2024, comments, the Minnesota Department of Natural Resources (DNR) identified its route preferences by region. In several cases the DNR identified multiple potential route segments within the same region. DNR did not recommend a complete route alternative. Therefore, in order to provide a like-for-like comparison of routes that could feasibly be permitted, Xcel Energy developed a DNR Proxy Route that utilizes the most reasonable route segments where the segments overlapped in the same region.²¹

The following table presents the combination of route segments recommended by Xcel Energy, DOC EERA, and DNR (See also Map 3 in Attachment B).

²⁰ See Finding 671, Table 11.

²¹ Xcel Response to Comments 18-19, ALJ Finding 219.

Xcel Energy, DOC DER, and DNR Recommended Route Segments

Region	Xcel Energy's Modified Blue Route	DOC EERA Route Recommendation	DNR Proxy Route
A	A6 (Blue)	A6 (Blue)	A6 (Blue)
B	B4 (Blue) + 212 + 216 + 219	B4 (Blue) + 211 + AA1 + 220 + 216	B4 (Blue) + 211 + 214
C	C4 (Blue) + Modified 223 ²²	C4 (Blue) + 223	C4 (Blue) + 223 + 105 (Blue to Purple)
D	D5 (Blue)	D5 (Blue)	D1 (Purple)
E	E2 (Blue)	E2 (Blue)	E1 (Purple)
F	F4 (Blue)	F4 (Blue)	F1 (Purple) + 109 or 110
G	G1 (Blue) + 244	G1 (Blue) + 244	G1 (Blue) + 115 + 240 + 249 and G3 + 248

Notes: As analyzed in the FEIS: A6 incorporates alternative route 202, and D5 incorporates alternative route 226.

I. Summary of Other Notable Alternative Route Segments

Throughout the review process, there were several route alternatives that received continued interest and support and include 211, 213, 214, 215, 220, 223, and AA1. Staff provides brief summaries of these alternatives for the Commission's consideration.

Alternative Route 211 (See Map 3-3 in Attachment C)

As provided in the Final EIS, Route Segment 211 departs the Blue Route at CR 8 and traverses south. It then turns east at CR 4 and continues north at Duncan Avenue until it rejoins the Blue Route. This route segment was proposed to avoid drainage infrastructure, environmental areas, Native American artifacts, and native prairies. This route alternative was originally suggested by Ben Hicks (landowner) during EIS scoping. This route is being recommend by DOC EERA to be included as part of the Modified Blue Route.²³

Alternative Route 213 (See Map 3-3 in Attachment C)

As provided in the Final EIS, Route Segment 213 departs the Blue Route by continuing north on Ideal Avenue. It turns east halfway into T112N, R37W, S14, and continues south at Kenwood Avenue until it rejoins the Blue Route. This route segment was proposed to avoid nearby dwellings and minimize impacts to farming operations. This route alternative was originally suggested by Jeff Potter (landowner) during EIS scoping. Xcel Energy identified several issues related to this alternative: close proximity to the Minnesota Department of Natural Resources (DNR) Sheridan Wildlife Management Area (WMA) and state conservation easements along the

²² Finding 215

²³ DOC EERA Comments and Recommendations (January 29, 2025).

Redwood River, a greenfield crossing of the Redwood River, and three additional angle structures that increase cost. However, Xcel Energy determined that this route alternative is feasible and would not object if it was selected.²⁴

Alternative Route 214 (See Map 3-5 in Attachment C)

As provided in the Final EIS, Route Segment 214 departs the Blue Route at Porter Avenue and traverses north. It turns east at 320th Street until it rejoins the Blue Route. This route segment was proposed to follow an existing transmission line corridor. This route alternative was originally suggested by Cletus Gewerth (landowner) during EIS scoping. Xcel Energy has maintained that this alternative “would require the installation of structures within a Board of Water and Soil Resources (BWSR) easement, which would likely require termination or alteration of the BWSR easement.”²⁵ This alternative is also part of the recent March 14, 2025, Notice of Comment.

Alternative Route 215 (See Map 3-5 in Attachment C)

As provided in the Final EIS, Route Segment 215 departs the Blue Route at Highway 19 and traverses east. It turns north halfway into T112, R34W, S2 until it rejoins the Blue Route. This route segment was proposed to avoid stray voltage impact on livestock and avoids dwellings. This route alternative was originally suggested by Andrew and Linda Rieke (landowner) during EIS scoping. Xcel Energy has indicated opposition to this alternative because of additional crossings of an existing 69 kV line with BWSR easements on each side of the road. This alternative is also part of the recent March 14, 2025, Notice of Comment.

Alternative Route 220 (See Map 3-5 in Attachment C)

As provided in the Final EIS, Route Segment 220 departs the Blue Route at State Highway 19 and traverses east. It turns north halfway into T112, R34W, S3 until it rejoins the Blue Route. This route segment was proposed to avoid dwellings. This route alternative was originally suggested by Brian Greenslit (landowner) during EIS scoping.²⁶ Xcel Energy has indicated that this segment would require two additional structures but otherwise took no position on this alternative. This route is being recommended by DOC EERA to be included as part of the Modified Blue Route.²⁷ This alternative is also part of the recent March 14, 2025, Notice of Comment.

Alternative Route 223 (See Map 3-9 in Attachment C)

As provided in the Final EIS, Route Segment 223 departs the Blue Route continuing east on 100th Street. It turns north at 515th Avenue until it rejoins the Blue Route. This route segment

²⁴ Xcel Energy Comments on Draft EIS (November 25, 2024).

²⁵ Xcel Energy Response to Comments (December 13, 2024).

²⁶ See also Brian Greenslit Letter (March 17, 2025).

²⁷ DOC EERA Comments and Recommendations (January 29, 2025).

was proposed to reduce the land use impacts to the area, notably the Lux Air Strip. This route alternative was originally suggested by Duane Anderson (landowner) during EIS scoping. Xcel has proposed a modified version of this route alternative that it would not oppose if selected.²⁸ This route is being recommended by DOC EERA to be included as part of the Modified Blue Route.²⁹

Alternative Alignment AA1 (See Map 3-5 in Attachment C)

As provided in the Final EIS, Alternative Alignment 1 is in Redwood County and was proposed to avoid crossing RIM easements. This route alternative was originally suggested by Tom Haak (landowner) during EIS scoping. This route is being recommended by both Xcel Energy and DOC EERA to be included as part of the Modified Blue Route.³⁰

ADMINISTRATIVE LAW JUDGE REPORT

To ensure robust record development, public participation, and examination of the issues, and as required by law, the Commission referred the route permit application to the OAH 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 683 findings and 20 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 certificate of need and a route permit, including designation of a specific route and additional permit conditions. 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.

J. Adequacy of Final EIS

The ALJ concluded that: (i) EERA conducted an appropriate environmental analysis for the Project for purposes of the certificate of need and route permit proceeding and the Final EIS satisfied applicable law, including Minn. R. 7849.0230 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.

²⁸ Xcel Energy Direct Testimony of Matthew Langan at 12 (September 6, 2024).

²⁹ DOC EERA Comments and Recommendations (January 29, 2025).

³⁰ DOC EERA Comments and Recommendations (January 29, 2025).

K. Certificate of Need

The Commission authorized the informal review process for the certificate of need application; nonetheless, the ALJ provided findings and recommendations on whether a certificate of need should be granted, which staff believes further benefits the record in this matter. Furthermore, by law, the Commission cannot grant a route permit without first granting a certificate of need when it is required. As a result, staff believes it was advantageous for the ALJ to evaluate the certificate of need application.

The ALJ recommended that the Commission grant a certificate of need. The ALJ concluded that all procedural requirements for processing the certificate of need application had been met and that the record evidence demonstrated that the MNEC Project meets the criteria for the issuance of a certificate of need. In developing her conclusions and recommendations, the ALJ in Section VIII of her Report provided findings (Findings 257 to 368) on each of the statutory and rule criteria that must be considered when determining whether to grant a certificate of need. For each of the criteria the ALJ primarily relied on and agreed with DOC DER's evaluation and recommendations, as summarized earlier in these briefing papers.

Also, concerning Minn. R. 7849.0120 (C)(2), the subpart addressing the natural/socioeconomic environment that DOC DER advised the Commission to consider the information in the EIS before making a decision, the ALJ concluded that, "the record demonstrates that the natural and socioeconomic impacts of the Project compare favorably to the effects of not building the Project and to other system alternatives studied in the EIS. None of those system alternatives meets the need for interconnecting 1,996 MW of renewable generation at Sherco."³¹

L. Route Permit

The ALJ recommended that the Commission grant a route permit to Xcel Energy for its MNEC Project using its Modified Blue Route including modified Alternative Route 223. The ALJ Report included findings 369 to 673 which discussed and compared the various route alternatives for the proposed Project in relation to the routing criteria established under Minn. R. 7850.4100. The ALJ concluded that "[Xcel Energy's] Modified [Blue] Route is consistent with the Commission's routing criteria and best balances and minimizes potential impacts, considering each of those criteria (including, but not limited to, residential impacts, natural resources, reliability, and cost). The Blue Route, Purple Route, and an MDNR route may offer benefits as to one routing factor or another, but each invite countervailing negative impacts on other factors."³²

³¹ See also ALJ Report findings 347 to 356.

³² Finding 673.

M. Permit Conditions

The ALJ identified a number of additional permit conditions as part of her recommendation on the Modified Blue Route.³³ In addition the ALJ recommended the inclusion of the modified permit language proposed by Xcel Energy in its December 2024 Response to Hearing Comments. Staff has summarized the permit additions and modifications in Table 1, Attachment D.

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. In this case, the deadline for filing exceptions was February 20, 2025. Exceptions to the ALJ Report were filed by DOC EERA and Xcel Energy.

N. DOC EERA Exceptions

In its Exceptions Letter dated February 20, 2025, DOC EERA proposed several new findings and revisions to the ALJ Report:

- to better reflect the route it recommended for Commission approval;
- to provide additional information on the public information meetings that were conducted; and
- to identify special permit conditions from the record that were inadvertently omitted.

O. Xcel Energy Exceptions

In its Exceptions Letter dated February 20, 2025, Xcel Energy proposed several revisions to the ALJ Report:

- To ensure Alternative Alignment AA1, that is being recommended by DOC EERA, is incorporated into Xcel Energy's Modified Blue Route;
- To provide additional information on modified Alternative Route 223;
- To indicate that the record does not support a decommissioning plan requirement because Xcel Energy is a Commission-regulated utility and has no plans to decommission the asset after any set timeframe; and
- To indicate that DNR coordination for calcareous fens only applies to the Purple Route, if permitted.

³³ Findings 675 and 676.

Staff has summarized DOC EERA and Xcel Energy's recommended revisions in Table 2, Attachment D.

MARCH 14 NOTICE OF COMMENT

On March 14, 2025, the Commission issued a Notice of Comment that posed four different route scenarios and transmission line configurations (Options 1-4) associated with the proposed Blue Route near the city of Franklin and the Minnesota River and requested a technical feasibility, reliability, and cost review of the options.³⁴ The four options attempted to utilize existing transmission line rights-of-way by removal/relocation and/or double- and triple-circuiting with one another or with portions of the proposed MNEC Project and its alternatives in the area, or both. Staff refers Commissioners to the maps of Options 1-4 provided by Xcel Energy in its March 20, 2025 Reply Comments.

P. Xcel Energy Response

According to Xcel Energy's March 20, 2025 Reply Comments, it does not recommend Options 1-4, indicating that while each of the four options may be technically feasible, further detailed technical analysis is necessary. As an initial matter, Xcel Energy argued that all of the options would significantly increase the overall project cost and schedule and may not provide the expected benefits to justify the greater expense. In each situation, the four options would introduce new issues for consideration.

Xcel Energy expressed concern that the proposed Project will be a radial line supporting the interconnection of more over 2,000 megawatts, making it the largest single contingency on the MISO footprint. As a result, Xcel Energy stated that the Project was not planned to be circuited with existing lines and was intended to limit existing line crossings for reliability reasons.

Generally, Xcel stated that Options 1-4 present or create one or more of the following concerns:

- Increased overall Project costs.
- Potential delays in the overall Project schedule.
- General technical challenges with system integration.
- Increased risk of system reliability issues.
- Higher and atypical maintenance and operational demands and worker safety concerns.
- Uncertainty regarding MNDOT easements along highway 19 and existing conservation easements.

³⁴ Notice of Comment Period (March 14, 2025).

- Possible increased negative environmental impacts at Minnesota River crossing, *e.g.*, increased vegetation clearing and additional structures and increased structure heights and foundations.

Q. Lower Sioux Indian Community

The Lower Sioux Indian Community (LSIC) in its March 20, 2025 Comment Letter raised its concern with a known historical site identified as 21RW0001 that it had identified during EIS scoping and that was discussed in the EIS. As provided in the Final EIS, Site 21RW0001 is a Native American burial mound site consisting of a single mound. The site is reported to have been destroyed by the development of a housing complex and gravel pit. In addition, the new MNEC Project would parallel an existing transmission line that intersects the site. See Map 4 in Attachment B that was developed using information from the LSIC letter dated March 19, 2024.

To mitigate potential impacts, LSIC recommended that the proposed east-west alignment along 320th Street be shifted south and the north-south alignment be shifted east in the area of Site 21RW0001. Additionally, LSIC recommended that all construction activities in that area include a tribal monitoring component.

Staff developed the special condition permit language below in response to LSIC's concerns. The language is also included and identified in attached Table 1 (Appendix D) as P1a.

The Permittee is required to coordinate with the Lower Sioux Indian Community during preconstruction and construction activities near known culturally sensitive areas including, but not limited to, Site 21RW0001. Coordination efforts must include, but is not limited to, Tribal construction monitors. The Permittee must file a preconstruction filing at least 14 days prior to the preconstruction meeting describing the coordination that occurred between the Xcel Energy and the Lower Sioux Indian Community. Xcel Energy must also describe the mitigation and routing strategies taken to avoid impacting the culturally sensitive areas.

1. Xcel Energy Response

In its March 24, 2025 Reply Comments, Xcel Energy, in response to LSIC concerns, indicated that it intends to thoroughly assess the extent and condition of Site 21RW0001 by conducting field surveys prior to construction with a commitment to tribal participation in these surveys and the employment of tribal monitors near the Minnesota River crossing and other key locations during the Project's construction. Additionally, Xcel Energy indicated it will implement an Unanticipated Discoveries Plan during construction.

R. Birch Coulee Solar

On March 24, 2025, Birch Coulee Solar, LLC filed reply comments in this matter indicating that one or more of the proposed Options 1-4 would adversely impact the proposed Birch Coulee Solar Project, which has an active site permit application with the Commission (Docket 23-477).

STAFF DISCUSSION

The following issues are before the Commission:

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

Based on information in the certificate of need and route permit applications, the analysis provided in the EIS, public comments, testimony, the ALJ Report, and other evidence in the record, staff provides the discussion below.

S. 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 certificate of need and a route permit for a high-voltage transmission line.

T. 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.

U. Certificate of Need

Staff agrees with DOC DER and the ALJ that Xcel Energy has demonstrated that the MNEC 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 MNEC Project.

Staff also agrees that the Commission should apply the following conditions (1 to 3) as agreed to by the DOC DER and Xcel Energy related to cost cap and rate recovery requirements and including DOC DER's condition (4) concerning composition of voltage support equipment notifications:

1. Provide a final number or cap amount within 90 days of the Commission's Order determining the route
2. Wait until the first scheduled rate case after the proposed Project is placed in-service to recover any cost overruns from Minnesota ratepayers.
3. Justify fully the reasonableness of recovering any cost overruns of the proposed 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.
4. Require Xcel Energy to provide updates regarding the composition of voltage support equipment (*i.e.*, static synchronous compensators (STATCOMs) versus interconnected solar facilities) after resource determinations have been made.

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 ALJ Report provides the required findings to make a positive determination on a certificate of need.

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.

V. Route Selection

Staff agrees with the recommendation of the ALJ that Xcel's Modified Blue Route is consistent with the Commission's routing criteria and best balances and minimizes impacts overall.

However, staff believes EERA's recommended modifications to Xcel's Modified Blue route along with Xcel Energy's modification to Route Alternative 223, further improves the route. Therefore, staff recommends that the Commission grant a route permit for DOC EERA's recommended route including Xcel Energy's modified alternative route 223 as presented in the table below.

PUC Staff Recommended Route

Region	DOC EERA Route with Xcel Modified 223
A	A6 (Blue)
B	B4 (Blue) + 211+ AA1 + 220 + 216
C	C4 (Blue) + Xcel Modified 223
D	D5 (Blue)
E	E2 (Blue)
F	F4 (Blue)
G	G1 (Blue) + 244

As requested by Xcel Energy, staff recommends the Commission also authorize a 150-foot route width for the Green Route between the existing Sherco and Sherco Solar West substations, and a general 1,000-foot route width for the Blue Route including the wider route widths identified in the table below for areas around proposed substations and conservation easements.

Expanded Route Width Areas

Area	Route Width (mile)	Length of Route (mile)	Township	Range	Sections
Voltage Support Substation	1.25	15.70	116	32	6
				33	1
			117	32	3,4,5,6,7,18,19,30,31
				33	1,12,13,24,25,36
			118	32	3,4,9,10,15,16,21,22,27,28,31-34
				33	36
			119	32	33,34
	1.25	5.30	111	37	19,30

Intermediate Substation 1				38	20-29
Intermediate Substation 2	1.01	2.86	110	38	7,8,17,18
				39	11-14
Terminal Substation	0.48	---	109	41	26
Conservation Easement 1	0.80	1.92	112	34	8,9,16-21
Conservation Easement 2	1.25	2.22	110	39	3,4,5,8,9,10,15,16,17

Source: Xcel Energy Route Permit Application, Table 2.3-1 (October 30, 2023)

W. ALJ Report Exceptions

Staff has presented Xcel Energy's and DOC EERA's proposed exceptions to the ALJ Report in Table 2, Attachment D.

The exceptions filed by Xcel Energy and DOC EERA do not point out any irregularities or mistakes but instead clarify language for information already in the report, *i.e.*, permit language recommendations, or provide justification for the consideration of certain alternative route or overall route selection. As such, depending on the Commission's decision on a route, certain exceptions may or may not apply.

Staff recommends the Commission adopt the following exceptions that relate to procedural history or permit conditions regardless of the route selected: E4, E5, E6, E7, E8, E9, E15, E22, E24-E33.

Staff recommends the Commission adopt the following exceptions if the staff recommended route (Modified Blue Route including Xcel Energy's modification to Route Alternative 223) is selected: E1, E2, E3, E11, E13, E14, E16, E17, E18, E19, E20, E21, E23

Staff does not recommend adopting E10, which was provided by Xcel Energy regarding Finding 501, which discusses a requirement for a decommissioning plan. Xcel argued that the record does not support the need for a decommissioning plan; however, as provided in the Final EIS, DOC EERA indicated that a decommissioning plan may be useful.

Staff also does not recommend adopting E12, which was provided by Xcel Energy in regard to Finding 573 and would limit the requirement for DNR consultation on calcareous fens to the Purple Route, if selected (see also permit language discussion in next section).

X. Route Permit Language Additions and Modifications

Staff has presented the proposed additional and modified route permit language in Table 1, Attachment D. Staff generally agrees with the proposed language changes with the exception of those identified below. Staff recommends the Commission adopt the following from the table: P1a, P2, P5, P6 (modified), P7, P8, P9, P11-P17.

IDs P1 and P1a (Tribal Monitoring)

Tribal monitoring was suggested by Boise Forte Band of Chippewa and LSIC (P1 and P1a, respectively); however, staff believe the language developed by staff related to the LSIC request contemplates the same requirements and is more comprehensive and therefore recommends P1a.

ID P2 (Calcareous Fens)

Xcel Energy believes calcareous fens only apply to the Purple Route; however, the DNR believes a comprehensive consultation on calcareous fens should apply to any route permitted for the project. Staff believes it is appropriate to require consultation with the DNR on calcareous fens for any route permitted and therefore recommends P2.

ID P3 (Compliance Filing Timing)

Xcel Energy's language provided under P3 concerning compliance filing timing is part of new legislation that will not take effect until July 1, 2025; therefore, this language should not be included.

P4 (Field Representative Notification)

Staff does not agree with Xcel Energy's proposed limitations related to Field Representative Notification. The language of the section is longstanding standard permit language and modification not necessary.

P6 and P10

Staff believe Xcel's proposed language is acceptable with the exception of "If the Commission does not notify the Permittee in writing within 14 days after the filing described above that the Commission finds that the filing is not consistent with this route permit, the Permittee may commence vegetation clearing as described in the filing." It is staff's understanding the Commission has moved away from non-action approvals. This applies to the language in P6 as well.

COMMISSION 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 (**See Table 2, Appendix D of these briefing papers**):

- a. E4 (DOC EERA)
- b. E5 (DOC EERA)
- c. E6 (DOC EERA)
- d. E7 (DOC EERA)
- e. E8 (DOC EERA)
- f. E9 (Xcel Energy)
- g. E15 (Xcel Energy)
- h. E22 (Xcel Energy)
- i. E24-33 (DOC EERA)
- j. E10 (Xcel Energy)
- k. E12 (Xcel Energy)

If the Commission grants a route permit for DOC EERA's recommended route including Xcel Energy's modified alternative route 223 adopt the following clarifications identified in paragraph 3. If permit is granted for a different route is the selections may change.

3. Adopt the following exceptions clarifications to the ALJ Report (**See Table 2, Appendix D of these briefing papers**):

- a. E1 (DOC EERA)
- b. E2 (Xcel Energy)
- c. E3 (Xcel Energy)
- d. E11 (DOC EERA)
- e. E13 (DOC EERA)
- f. E14 (DOC EERA)
- g. E15 (Xcel Energy)
- h. E16 (DOC EERA)
- i. E17 (DOC EERA)

- j. E18 (DOC EERA)
- k. E19 (DOC EERA)
- l. E20 (DOC EERA)
- m. E21 (Xcel Energy)
- n. E23 (DOC EERA)

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 DOC EERA to revise.

[If Environmental Impact Statement is determined to be adequate, move on to next decisions.]

Certificate of Need

- 6. Grant a certificate of need for the MNEC Project. (ALJ, DOC DER, Xcel Energy, CEEM, The Joint Commenters, LIUNA, IBEW, Local 49-Carpenters)

And

- 7. Condition the certificate of need determination on requirements that Xcel Energy:
 - a. File a final cost number or cap amount within 90 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)

- d. File updates regarding the composition of voltage support equipment (*i.e.*, static synchronous compensators (STATCOMs) versus interconnected solar facilities) after resource determinations have been made. (DOC DER)

Or

- 8. Deny a certificate of need for the MNEC Project and state the reasons for the denial. (NoCapX 2020)

[If certificate of need is issued, move on to next decisions]

Route Permit

- 9. Grant a route permit for the MNEC Project and designate the following route:
 - a. Green and Purple Routes
 - b. Green and Blue Routes
 - c. Xcel Energy Modified Blue Route + AA1 (Xcel Energy)
 - d. DOC EERA Route (DOC EERA)
 - e. DOC EERA Route + Xcel Energy Modified 223 (PUC Staff)
 - f. DNR Proxy Route

And

- 10. Authorize a 150-foot route width for the Green Route and a 1,000-foot route width for the remainder of the route including the expanded route widths identified in the Expanded Route Width Areas Table under the Staff Discussion section of these briefing papers.

And

- 11. Adopt the following special permit conditions (**See Table 1, Appendix D of these briefing papers**):
 - a. P1 (Boise Forte Band of Chippewa)
 - b. P1a (Lower Sioux Indian Community)
 - c. P2 (DNR)

- d. P3 (Xcel Energy)
- e. P4 (Xcel Energy)
- f. P5 (Xcel Energy)
- g. P6 (Xcel Energy)
- h. P7 (DOC EERA)
- i. P8 (Xcel Energy)
- j. P9 (Xcel Energy)
- k. P10 (Xcel Energy)
- l. P11-17 (DOC EERA)
- m. P18 (LIUNA)

Or

- 12. Deny a route permit for the MNEC Project.

Administrative

- 13. Authorize Commission staff to modify the route permit and ALJ Report to correct typographic and formatting errors and ensure agreement with the Commission's final order in the matter, as necessary.

Staff Recommendation: 1, 2a-2i, 3a-3n, 4, 6, 7a-7d, 9e, 10, 11b, 11c, 11f-11j, 11l, 11m, and 13

Attachment A

Written Comments Received During Public Hearing Process

Written Comments Received During Public Hearing Comment Period

Individual Citizens

Name	Date	eDocket No.
Abraham R	2024-11-21	202411-212262-03
Allen Amy	2024-11-26	202411-212462-01
Ammermann R	2024-11-26	202411-212462-02
Arenholz C	2024-11-04	202411-211573-02
Arnold J	2024-11-21	202411-212231-01
Arnold Julie	2024-11-21	202411-212231-01
Asfeld C	2024-11-21	202411-212262-04
Asfeld Jeff	2024-11-21	202411-212262-04
Asfeld Kelli	2024-11-25	202411-212338-03
Asfeld Kelli	2024-11-25	202411-212338-04
Asfeld Kenneth	2024-11-18	202411-212085-01
Asfeld Tami	2024-11-18	202411-212085-01
Asfeld Tami	2024-11-21	202411-212231-01
Barka Jennifer	2024-11-26	202411-212411-01
Barka Jon	2024-11-20	202411-212196-01
Barka Jon	2024-11-25	202411-212362-01
Barka Judy	2024-11-25	202411-212376-01
Beck S	2024-11-18	202411-212085-01
Behrendt J	2024-11-25	202411-212357-01
Berres P	2024-11-25	202411-212334-05
Berrres Q	2024-11-25	202411-212334-02
Bessingpas	2024-11-26	202411-212457-01
Betzler S	2024-12-02	202412-212551-01
Bieto K	2024-11-25	202411-212380-02
Binsfeld David	2024-11-25	202411-212342-06
Binsfeld Diane	2024-11-19	202411-212120-01
Binsfeld Diane	2024-11-25	202411-212340-02
Binsfeld M	2024-11-18	202411-212085-01
Bloom G	2024-11-25	202411-212340-06
Bloom G	2024-11-25	202411-212393-02
Bohlsen D	2024-12-02	202412-212545-02
Bos M	2024-10-29	202410-211414-01
Braem L	2024-11-25	202411-212380-01
Branson J	2024-11-25	202411-212344-03
Brinkman B	2024-11-25	202411-212344-02
Brovold	2024-11-26	202411-212462-04
Bury Patty	2024-11-25	202411-212380-04
Buyse Dan	2024-11-14	202411-211932-02
Cabrera Miguel	2024-11-25	202411-212348-01
Cabrera Miguel	2024-11-25	202411-212349-01
Carlson G	2024-10-28	202410-211374-01
Christensen J	2024-11-25	202411-212341-04
Christensen K	2024-11-26	202411-212462-02
Christensen W	2024-11-26	202411-212462-02
Churchill A	2024-11-25	202411-212380-01
Combs G	2024-11-26	202411-212462-01

Name	Date	eDocket No.
Combs V	2024-11-26	202411-212462-01
Cremers S	2024-11-25	202411-212334-17
Cremers S	2024-11-25	202411-212334-18
Dallenbach Catherine	2024-11-26	202411-212462-03
Dobberstein R	2024-11-25	202411-212334-01
Dockendorf L	2024-11-25	202411-212380-03
Dockendorf Steve	2024-11-25	202411-212380-03
Donnay Brad	2024-11-21	202411-212262-04
Donnay D	2024-11-15	202411-212011-03
Donnay E	2024-11-15	202411-212011-05
Donnay H	2024-11-21	202411-212262-02
Donnay James	2024-11-21	202411-212262-05
Donnay Kevin	2024-11-07	202411-211709-01
Donnay N	2024-11-21	202411-212262-02
Donnay W	2024-11-21	202411-212262-06
Doran James	2024-12-02	202412-212551-01
Doran Spencer	2024-12-02	202412-212551-01
Doran W	2024-12-02	202412-212551-01
Duane F	2024-11-04	202411-211573-02
Durant K	2024-11-25	202411-212380-01
Durant Karen	2024-11-26	202411-212462-03
Foster M	2024-10-29	202410-211413-01
Foster Matt	2024-11-07	202411-211693-02
Fox B	2024-11-18	202411-212085-01
Fox E	2024-11-18	202411-212085-01
Frank J	2024-11-26	202411-212462-02
Frank Nicole	2024-11-26	202411-212462-04
Freedland J	2024-11-25	202411-212341-03
Frericks K	2024-11-26	202411-212462-02
Gehrke B	2024-11-25	202411-212393-01
Gehrke Bryce	2024-11-25	202411-212344-06
Gehrke Byron	2024-11-25	202411-212342-01
Gehrke E	2024-11-25	202411-212340-03
Gehrke K	2024-11-25	202411-212339-01
Geissler A	2024-11-25	202411-212343-06
Gerdes S	2024-11-15	202411-212013-06
Greenslit	2024-11-22	202411-212328-01
Griffith J	2024-11-21	202411-212262-05
Grossinger K	2024-10-22	202410-211236-01
Gutwasser Erin	2024-11-25	202411-212380-04
Haak T	2024-11-26	202411-212462-02
Hanna T	2024-11-26	202411-212462-01
Helgeson E	2024-11-25	202411-212340-05
Helgeson J	2024-11-25	202411-212341-02
Hemish D	2024-11-26	202411-212462-02
Henfges J	2024-11-25	202411-212337-02

Name	Date	eDocket No.
Combs M	2024-11-26	202411-212462-04
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Hilbert B	2024-11-07	202411-211695-01
Hilbert B	2024-11-26	202411-212462-01
Hilbert R	2024-11-05	202411-211610-01
Hilsgen T	2024-11-15	202411-212013-10
Hoffman Dave	2024-11-25	202411-212380-03
Hoffman R	2024-11-25	202411-212380-01
Hoffman Scott	2024-11-21	202411-212262-05
Hogan M	2024-11-26	202411-212462-03
Holtz C	2024-11-18	202411-212085-01
Honer Adam	2024-11-04	202411-211578-02
Honer J	2025-01-28	
Honer Janel	2024-11-04	202411-211578-02
Honer Jim	2024-11-04	202411-211578-02
Honer Rachel	2024-11-04	202411-211578-02
Hoye C	2024-11-18	202411-212085-01
Huberty A	2024-11-21	202411-212262-08
Huberty C	2024-11-21	202411-212262-03
Huberty M	2024-11-15	202411-212013-02
Huberty R	2024-11-15	202411-212013-04
Husteft D	2024-11-04	202411-211573-02
Ingebrigtson D	2024-11-25	202411-212339-05
Ingebrigtson Family	2024-11-25	202411-212343-03
Jacobs J	2024-10-22	202410-211235-02
Jensen C	2024-11-25	202411-212342-03
Jensen P	2024-11-25	202411-212334-04
Jensen Patrick	2024-11-25	202411-212341-05
Johnson Deron	2024-11-26	202411-212462-01
Johnson Dylan	2024-11-18	202411-212085-01
Johnson T	2024-11-25	202411-212380-02
Jorgenson A	2024-11-26	202411-212462-03
Junkermeier J	2024-11-20	202411-212196-01
Karg B	2024-11-04	202411-211570-02
Karg B	2024-11-25	202411-212380-02
Keike Herb	2024-11-26	202411-212462-01
Kemper D	2024-12-10	202412-212843-01
Kersten D	2024-11-21	202411-212262-02
Kimmet K	2024-11-25	202411-212339-02
Klaverkamp Debra	2024-11-13	202411-211871-01
Klaverkamp K	2024-11-13	202411-211874-01
Knoblauch L	2024-12-03	202412-212619-01
Korte C	2024-11-25	202411-212357-01
Kramer Randy	2024-11-21	202411-212262-08
Kronenberg Utley	2024-11-21	202411-212262-04
Kronenberg Utley	2024-11-25	202411-212380-03
Kronenberg Utley	2024-11-12	202411-211805-02
Kuechle R	2024-11-21	202411-212262-03

Name	Date	eDocket No.
Hennen E	2024-11-21	202411-212262-08
Lanoue D	2024-11-25	202411-212357-01
Lanoue E	2024-11-21	202411-212251-01
LaVoy J	2024-11-15	202411-212011-07
Leither J	2024-11-21	202411-212262-07
Lemke T	2024-11-25	202411-212380-01
Libbesmeier Brad	2024-11-21	202411-212231-01
Libbesmeier Brad	2024-11-21	202411-212231-01
Libbesmeier E	2024-11-21	202411-212231-01
Libbesmeier E	2024-11-21	202411-212231-01
Libbesmeier Kevin	2024-12-02	202412-212551-01
Libbesmeier M	2024-11-18	202411-212085-01
Libbesmeier T	2024-11-26	202411-212462-03
Libbesmeier T	2024-11-26	202411-212462-03
Lichte D	2024-11-25	202411-212342-05
Lichte L	2024-11-25	202411-212334-08
Linz L	2024-12-02	202412-212545-01
Louwagie D	2024-11-25	202411-212380-02
Lux D	2024-11-15	202411-211989-01
Maas Kevin	2024-11-25	202411-212380-02
Maas Kevin	2024-11-26	202411-212462-03
Macik D	2024-11-13	202411-211872-02
Macik G	2024-11-05	202411-211610-01
Magedanz J	2024-11-26	202411-212462-02
Magedanz Sarah	2024-11-26	202411-212462-02
Manuel J	2024-11-21	202411-212262-03
Markwardt P	2024-11-14	202411-211931-01
Marxen Paul	2024-11-19	202411-212120-01
McCarney M	2024-11-22	202411-212328-04
McKlveen R	2024-11-05	202411-211610-01
Medeck D	2024-11-25	202411-212340-04
Mertens Leo	2024-11-25	202411-212357-01
Mertens Todd	2024-11-25	202411-212357-01
Mies B	2024-11-01	202411-211532-02
Mitchell Fitzgerald	2024-11-22	202411-212328-02
Mitzner E	2024-11-21	202411-212262-05
Molitor Ronald	2024-11-21	202411-212262-02
Mondloch C	2024-11-25	202411-212342-02
Mondloch D	2024-11-25	202411-212343-01
Nelson Benjamin	2024-12-03	202412-212618-01
Nelson E	2024-11-26	202411-212462-04
Neubauer M	2024-11-12	202411-211829-02
Newberger L	2024-11-26	202411-212429-01
Nordgaard B	2024-10-21	202410-211141-01
OBrien K	2024-11-25	202411-212340-01
OBrien S	2024-11-25	202411-212334-15
Oftedahl T	2024-11-26	202411-212462-01
Otto R	2024-11-25	202411-212380-02
Pfeifle A	2024-11-20	202411-212196-01

Name	Date	eDocket No.
Laabs R	2024-11-26	202411-212462-04
Pierskalla J	2024-10-21	202410-211137-01
Pierskalla J	2024-11-07	202411-211709-03
Pikula Joshua	2024-12-02	202412-212551-01
Pladson	2024-07-11	20247-208509-02
Pladson	2024-11-01	202411-211532-02
Potter J	2024-11-25	202411-212380-01
Potter J	2024-11-25	202411-212380-03
Poulin M	2024-11-07	202411-211732-04
Powell	2024-10-30	202410-211439-01
Pramann Wade	2024-11-25	202411-212334-13
Pramann William	2024-11-25	202411-212334-12
Rain A	2024-11-25	202411-212343-04
Rasmussen A	2024-11-19	202411-212120-01
Rasmussen V	2024-11-26	202411-212462-03
Rasmussen A	2024-11-25	202411-212380-03
Reberg J	2024-11-25	202411-212337-03
Reberg J	2024-11-25	202411-212338-01
Reberg M	2024-11-25	202411-212334-06
Reberg M	2024-11-25	202411-212334-09
Reeve	2024-11-19	202411-212120-01
Rosenow S	2024-11-25	202411-212334-16
Runke Andrea	2024-12-02	202412-212551-01
Rust L	2024-11-12	202411-211805-02
Sauer A	2024-11-01	202411-211532-02
Sauer A	2024-11-12	202411-211805-02
Saunders R	2024-11-26	202411-212462-02
Schabel B	2024-11-05	202411-211610-01
Schabel B	2024-11-25	202411-212344-01
Schabel D	2024-11-07	202411-211709-03
Schabel D	2024-11-25	202411-212343-02
Schabel J	2024-11-07	202411-211709-01
Schabel J	2024-11-25	202411-212340-07
Schabel Ron	2024-11-19	202411-212120-01
Schabel Ron	2024-11-20	202411-212196-01
Schabel Ron	2024-11-25	202411-212380-03
Schabel Ron	2024-11-25	202411-212380-01
Schabel Ron	2024-11-25	202411-212380-02
Schable Ron	2024-11-08	202411-211732-01
Schmidt Gerald	2024-11-04	202411-211578-02
Schmidt Gerald	2024-11-13	202411-211875-02
Schmidt James	2024-11-01	202411-211532-02
Schmidt Jean	2024-11-01	202411-211532-02
Schmidt Jean	2024-11-12	202411-211805-02
Schmidt K	2024-11-25	202411-212339-04
Schmidt Nancy	2024-11-01	202411-211532-02
Schmidt Ron	2024-11-01	202411-211532-02
Schwandt W	2024-11-22	202411-212328-05
Sharkey K	2024-11-12	202411-211805-02

Name	Date	eDocket No.
Pierskalla	2024-10-28	202410-211355-01
Simon B	2024-11-25	202411-212344-04
Slagter J	2024-11-26	202411-212462-03
Snoble C	2024-11-25	202411-212390-01
Spaulding J	2024-11-25	202411-212341-01
Spaulding T	2024-11-25	202411-212334-14
Stage G	2024-12-04	202412-212685-01
Stein J	2024-11-12	202411-211805-02
Stelten C	2024-11-25	202411-212380-03
Stelten R	2024-11-25	202411-212380-03
Stoutland J	2024-11-25	202411-212380-02
Suggs K	2024-11-07	202411-211732-06
Taatjes B	2024-11-15	202411-212011-01
Teicher	2024-11-22	202411-212328-03
Theisen B	2024-11-26	202411-212461-01
Thielen B	2024-11-21	202411-212262-04
Thielen Greg	2024-11-21	202411-212262-04
Treanor D	2024-11-21	202411-212262-05
Treanor K	2024-11-21	202411-212262-05
Tschida D	2024-11-25	202411-212342-04
Tschumperlein D	2024-11-21	202411-212262-07
Tschumperlein K	2024-11-21	202411-212262-07
Urdahl W	2024-11-21	202411-212262-08
Vinar Jenny	2024-11-25	202411-212335-01
Vinar Julia	2024-11-25	202411-212337-01
Volstad J	2024-11-07	202411-211696-01
Vossen B	2024-11-25	202411-212344-05
Wallenbach V	2024-11-26	202411-212462-03
Walsh Alvin	2024-11-21	202411-212262-05
Weedman K	2024-11-18	202411-212085-01
Weedman Kent	2024-11-18	202411-212085-01
Weis D	2024-11-04	202411-211573-02
Wenzel Esther	2024-12-02	202412-212551-01
Wesseman John	2024-11-21	202411-212262-03
Wills D	2024-11-01	202411-211532-02
Wills K	2024-11-25	202411-212338-02
Wills S	2024-11-21	202411-212262-05
Wills T	2024-11-01	202411-211532-02
Winter D	2024-11-21	202411-212262-07
Winter G	2024-11-19	202411-212120-01
Winter L	2024-11-26	202411-212466-01
Winter T	2024-11-21	202411-212262-07
Woolcott J	2024-11-26	202411-212462-01
Woolcott S	2024-11-15	202411-212013-08
Zupon S	2024-11-21	202411-212251-02

Name	Date	eDocket No.
Simon A	2024-11-25	202411-212343-05

Name	Date	eDocket No.
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State and Local Governments

Name	Date	eDocket No.
Minnesota Department of Natural Resources	2024-11-26	202411-212410-01
Minnesota Department of Natural Resources	2024-11-26	202411-212410-02
Minnesota Department of Natural Resources	2024-11-26	202411-212410-03
Minnesota Department of Transportation	2024-11-25	202411-212360-01
Clearwater Township Board	2024-11-25	202411-212392-01
Gales and Johnsonville Township	2024-11-25	202411-212380-04
Lake Lillian Township	2024-11-25	202411-212380-04
Maine Prairie Township	2024-11-21	202411-212245-01
Melville Township	2024-11-19	202411-212114-01
Redwood County	2024-11-26	202411-212462-04

Organizations

Name	Date	eDocket No.
Anderson Trucking Service	2024-11-26	202411-212410-01
Center for Rural Affairs	2024-11-26	202411-212410-02
Land and Liberty Coalition	2024-11-26	202411-212410-03
LIUNA	2024-11-25	202411-212360-01
Clearwater Township Board	2024-11-25	202411-212392-01
Gales and Johnsonville Township	2024-11-25	202411-212380-04
Lake Lillian Township	2024-11-25	202411-212380-04
Maine Prairie Township	2024-11-21	202411-212245-01
Melville Township	2024-11-19	202411-212114-01
Redwood County	2024-11-26	202411-212462-04

Form Letters and Petitions

- Form Letter 1 (Jensen Group), Multiple eDocket numbers, e.g. 202411-212334-01, Individuals included in lists above.
- Form Letter 2 (Regarding Property Land Right Statement, 10 Batches), Multiple eDocket numbers, e.g. 20251-213694-01.

Informational Maps

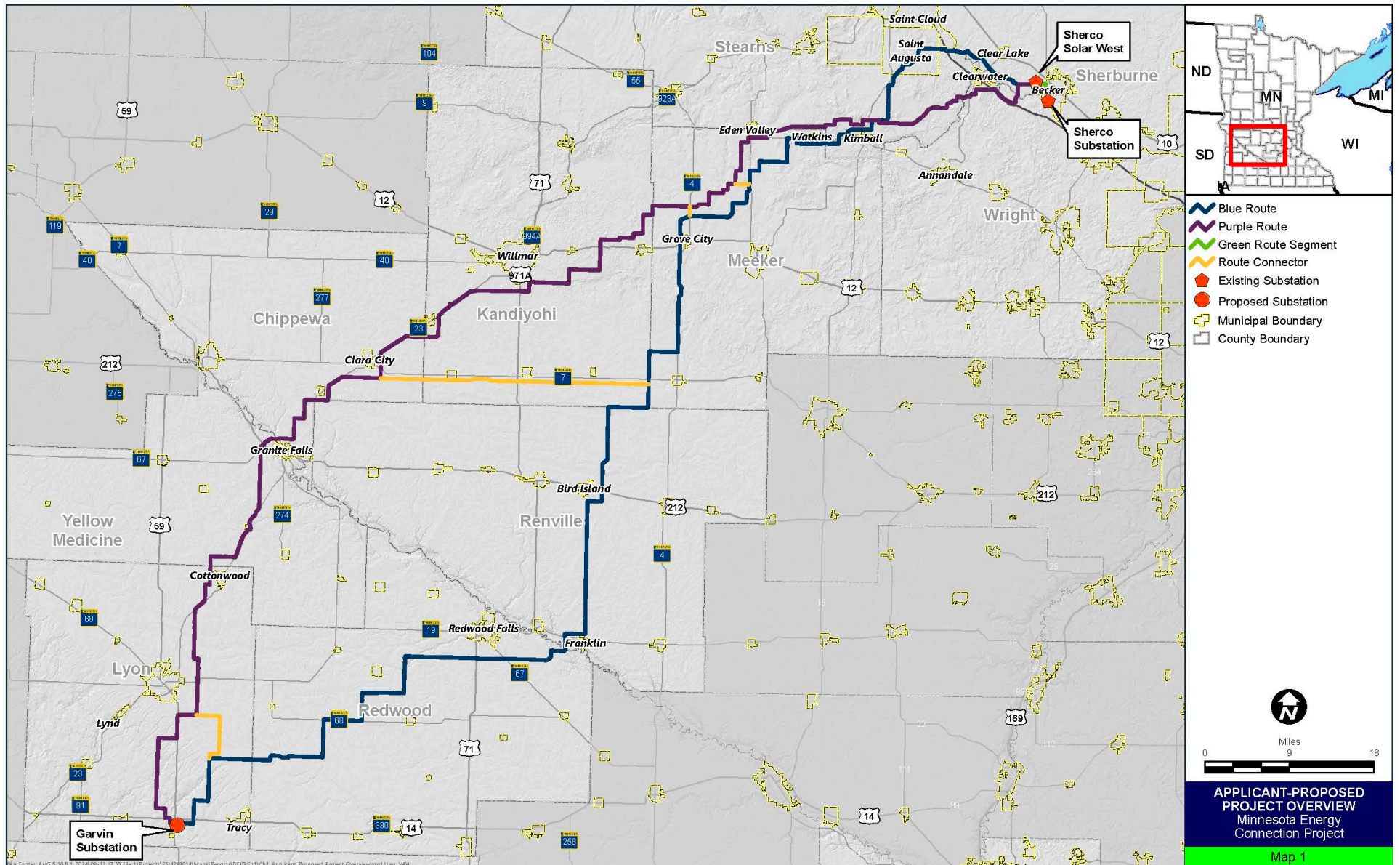
Map 1: Project Overview Map

Map 2: Route Alternatives and Regions

Map 3: Modified Blue Route, DOC EERA Route, and DNR Route

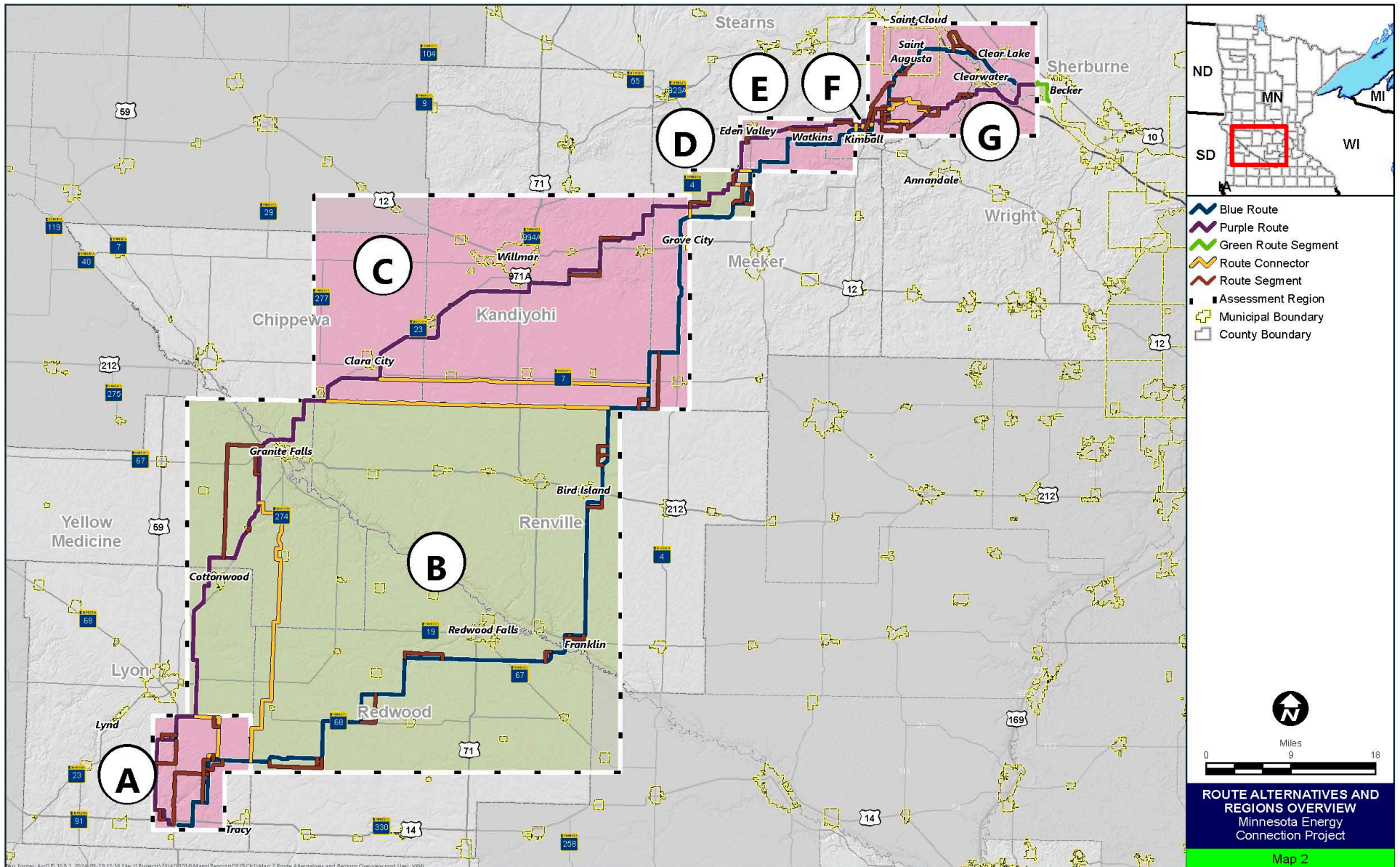
Map 4: Site 21RW0001

Map 1 Project Overview Map



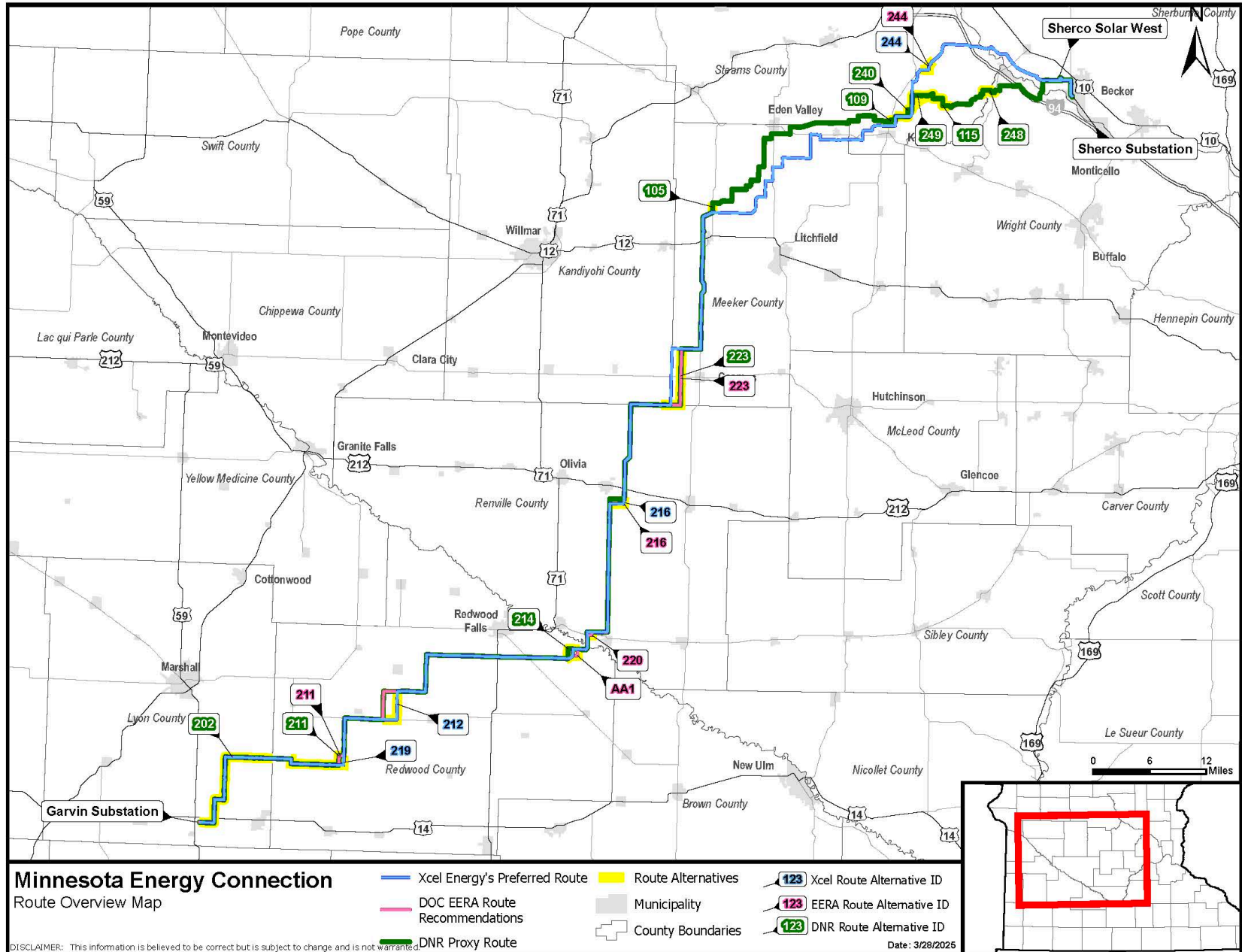
Source: Final EIS, Map 1 (January 22, 2025)

Map 2 Route Alternatives and Regions



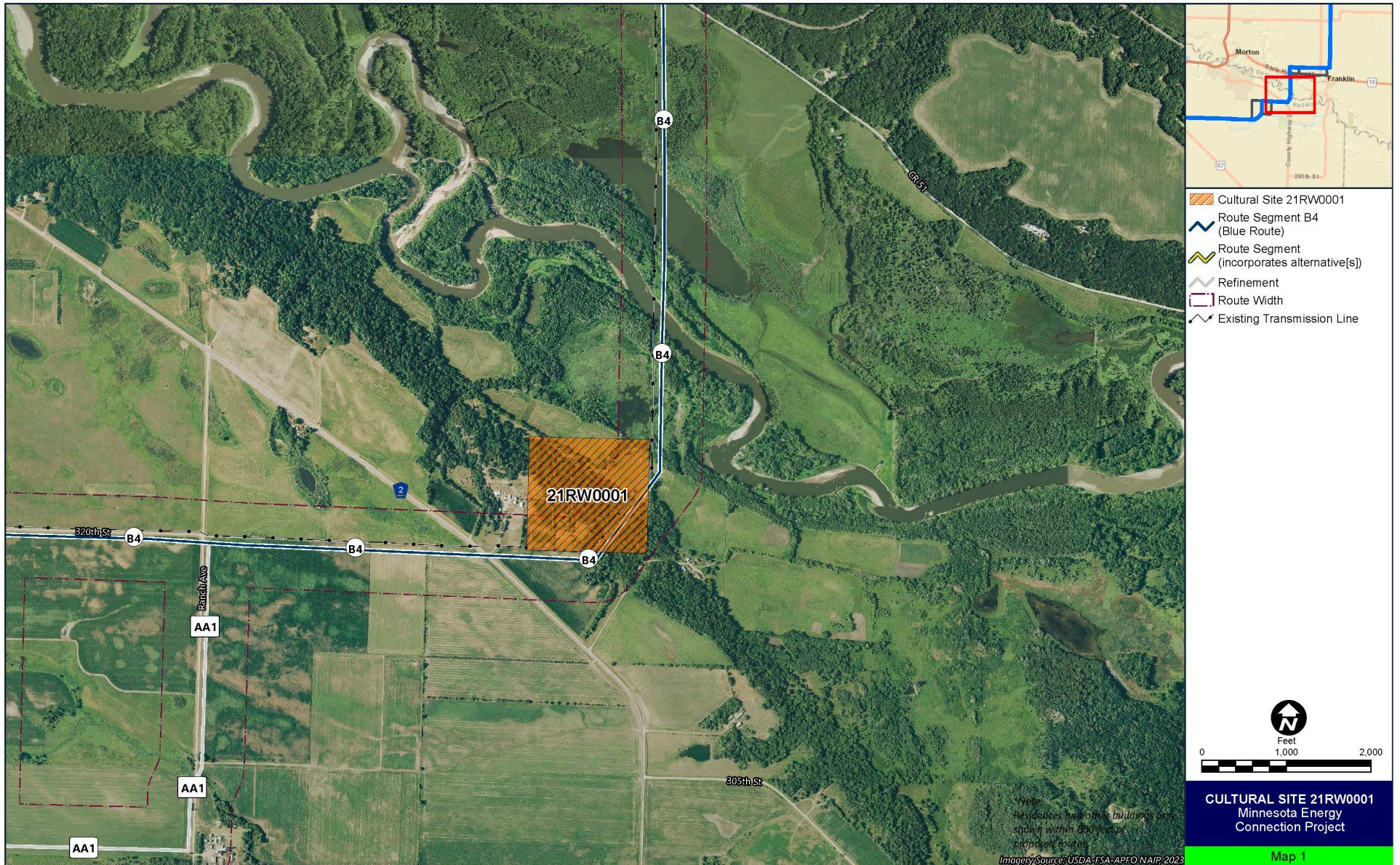
Source: Final EIS, Map 1 (January 22, 2025)

Map 3 Modified Blue Route, DOC EERA Route, and DNR Route



Source: New map created for discussion purposes only.

Map 4 Site 21RW0001



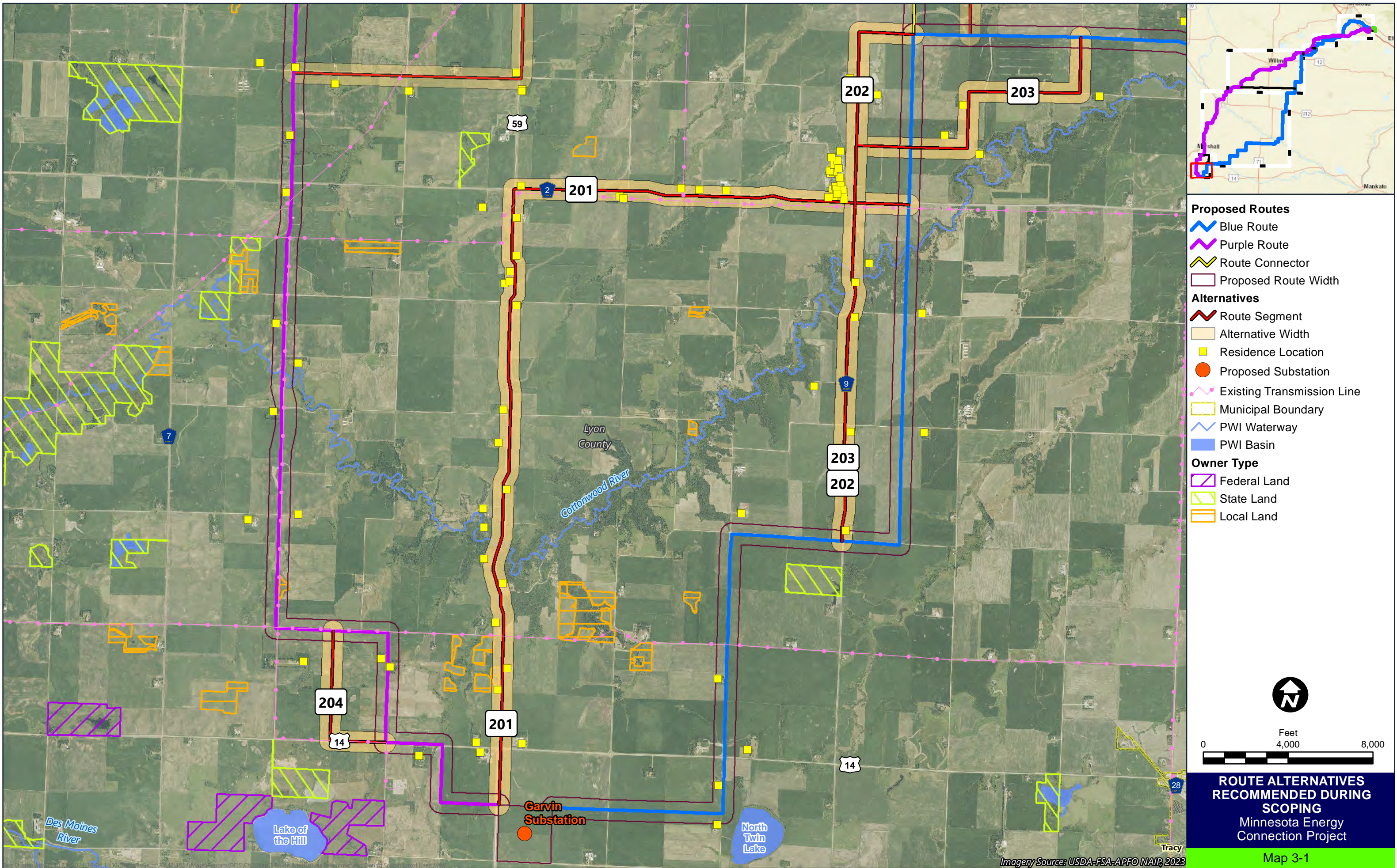
Source: New map created for discussion purposes only.

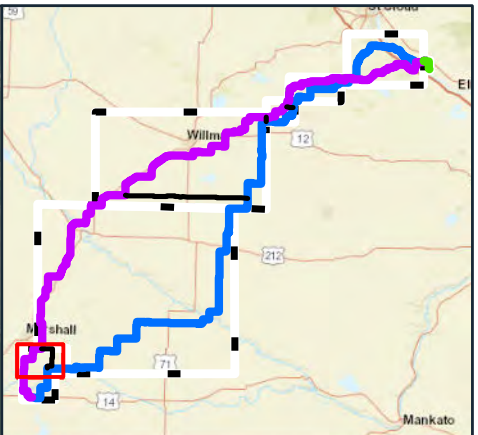
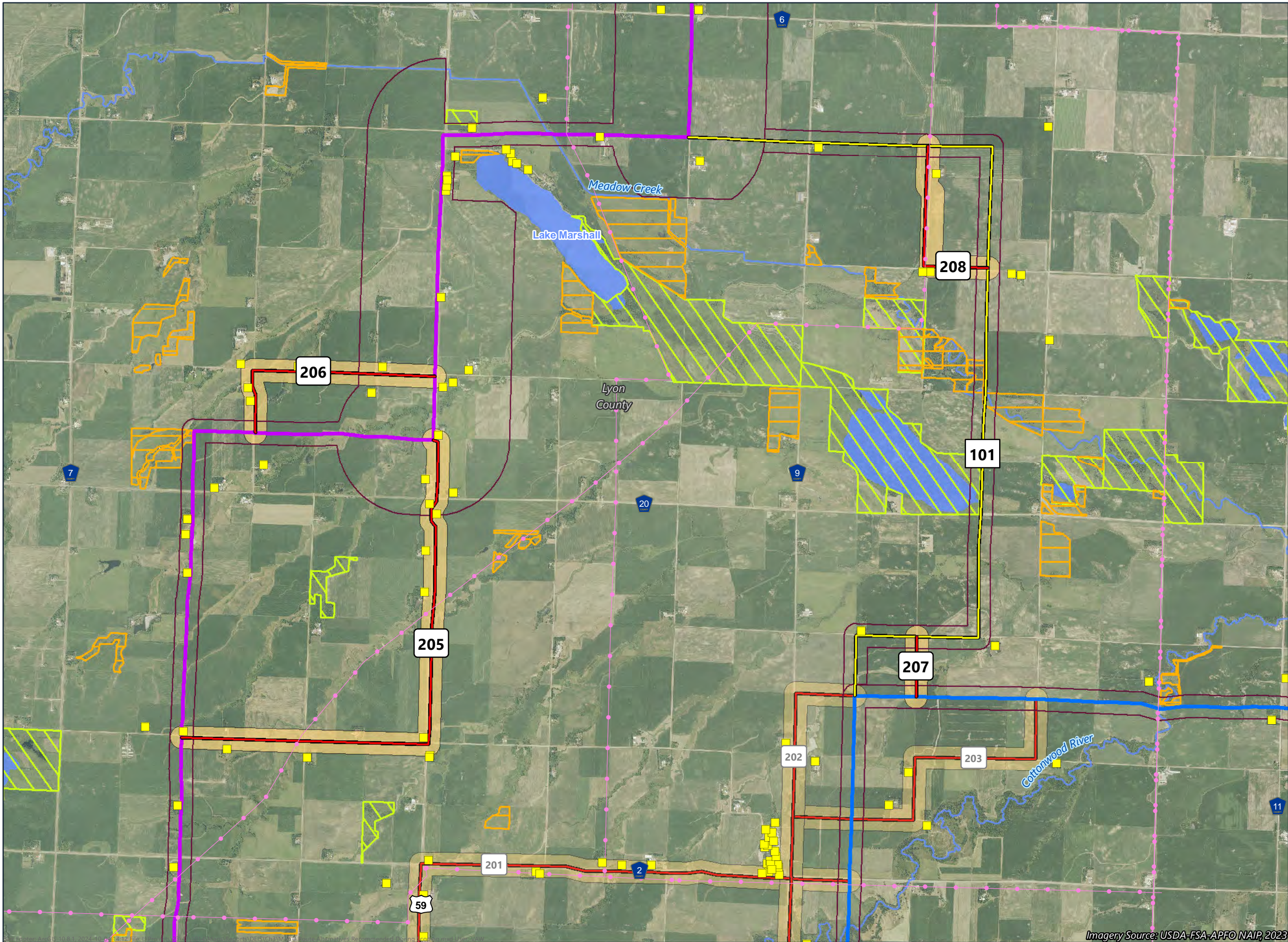
Attachment C

Detailed Maps of Alternative Route Segments

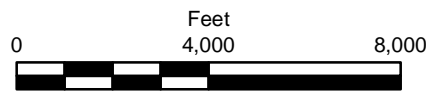
Alternate Route Key for Maps 3-1 to 3-20

Map	Route	Alternative Route Segment	Alternative Alignment	Connector Route
Map 3-1	Purple/Blue (South)	201, 202, 203, 204		
Map 3-2	Purple/Blue	205, 206, 207, 208		101
Map 3-3	Blue	211, 212, 213, 219		102
Map 3-4	Purple	209, 210, 221	AA4	
Map 3-5	Blue	214, 215, 220	AA1	
Map 3-6	Blue	216, 217, 218		
Map 3-7	Purple/Blue			103, 104
Map 3-8	Connector		AA2	104
Map 3-9	Blue	222, 223		
Map 3-10	Purple	224, 225		
Map 3-11	Purple/Blue	226, 227, 228		105, 106
Map 3-12	Purple/Blue	229, 230		107
Map 3-13	Purple/Blue	231, 232		
Map 3-14	Purple/Blue	233		108, 109, 110
Map 3-15	Purple/Blue	234, 241, 242, 249, 250		111
Map 3-16	Purple/Blue	235, 236, 237, 238, 239, 240		
Map 3-17	Purple	243, 247, 248	AA3	
Map 3-18	Blue	244		
Map 3-19	Blue	245, 246		
Map 3-20	Purple/Blue/Green (North)			

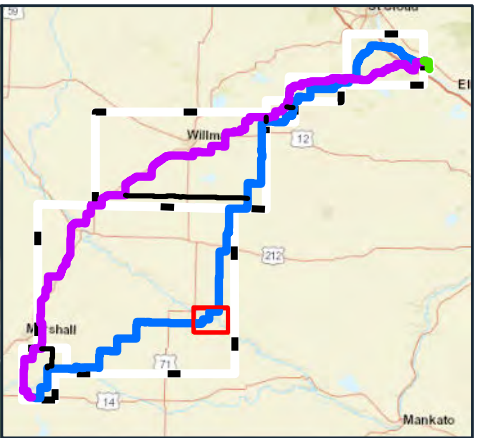
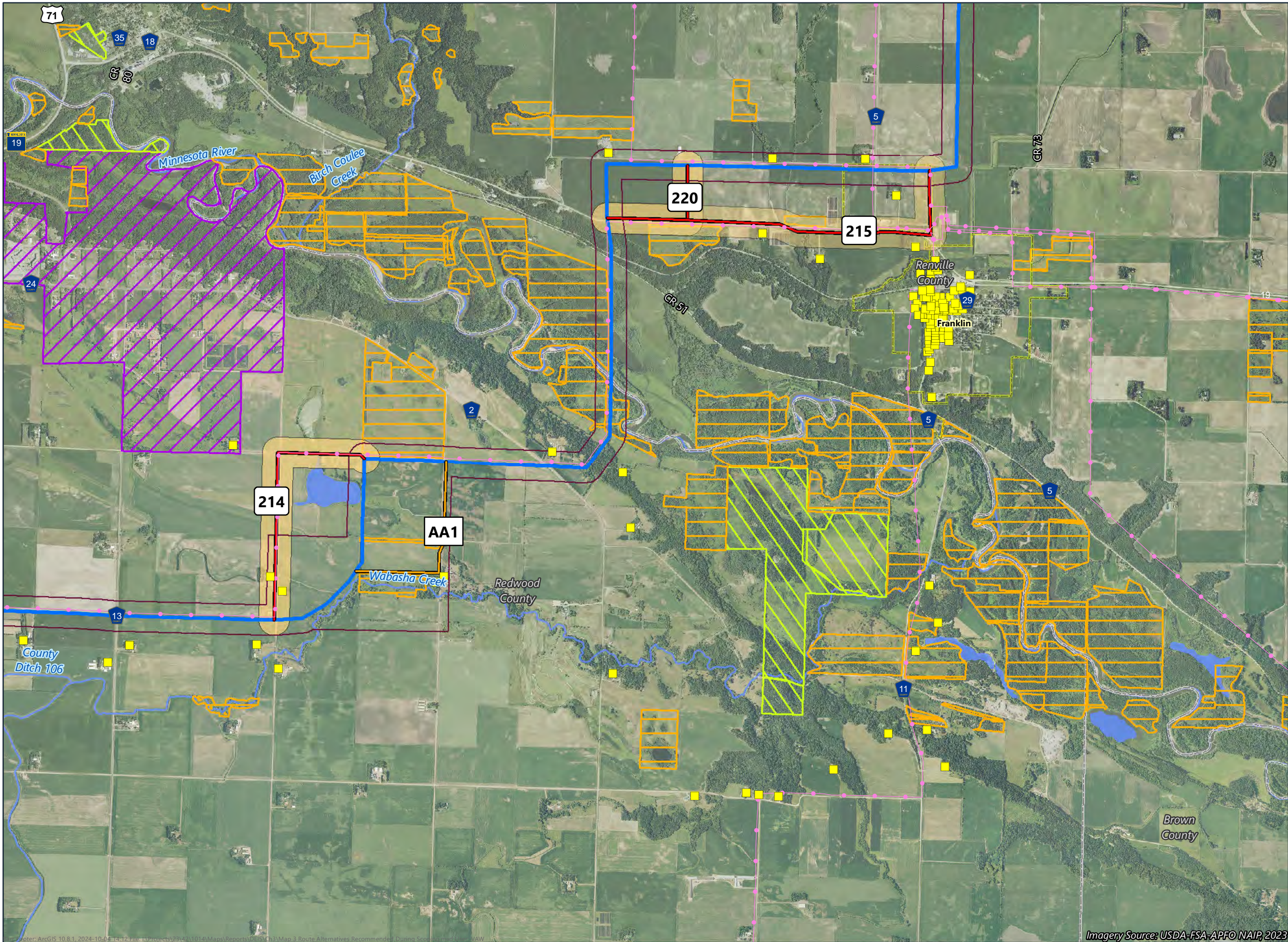




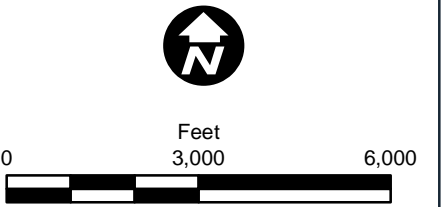
- Proposed Routes**
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 - Purple Route
 - Route Connector
 - Proposed Route Width
- Alternatives**
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 - PWI Basin
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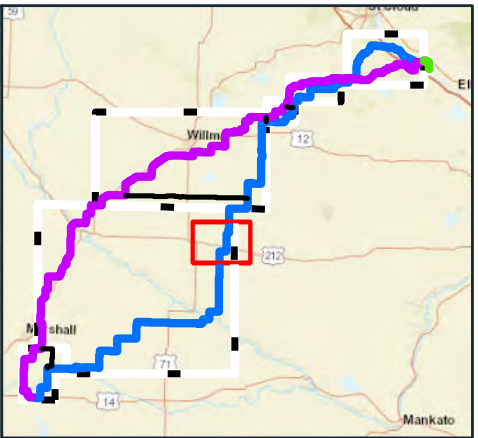
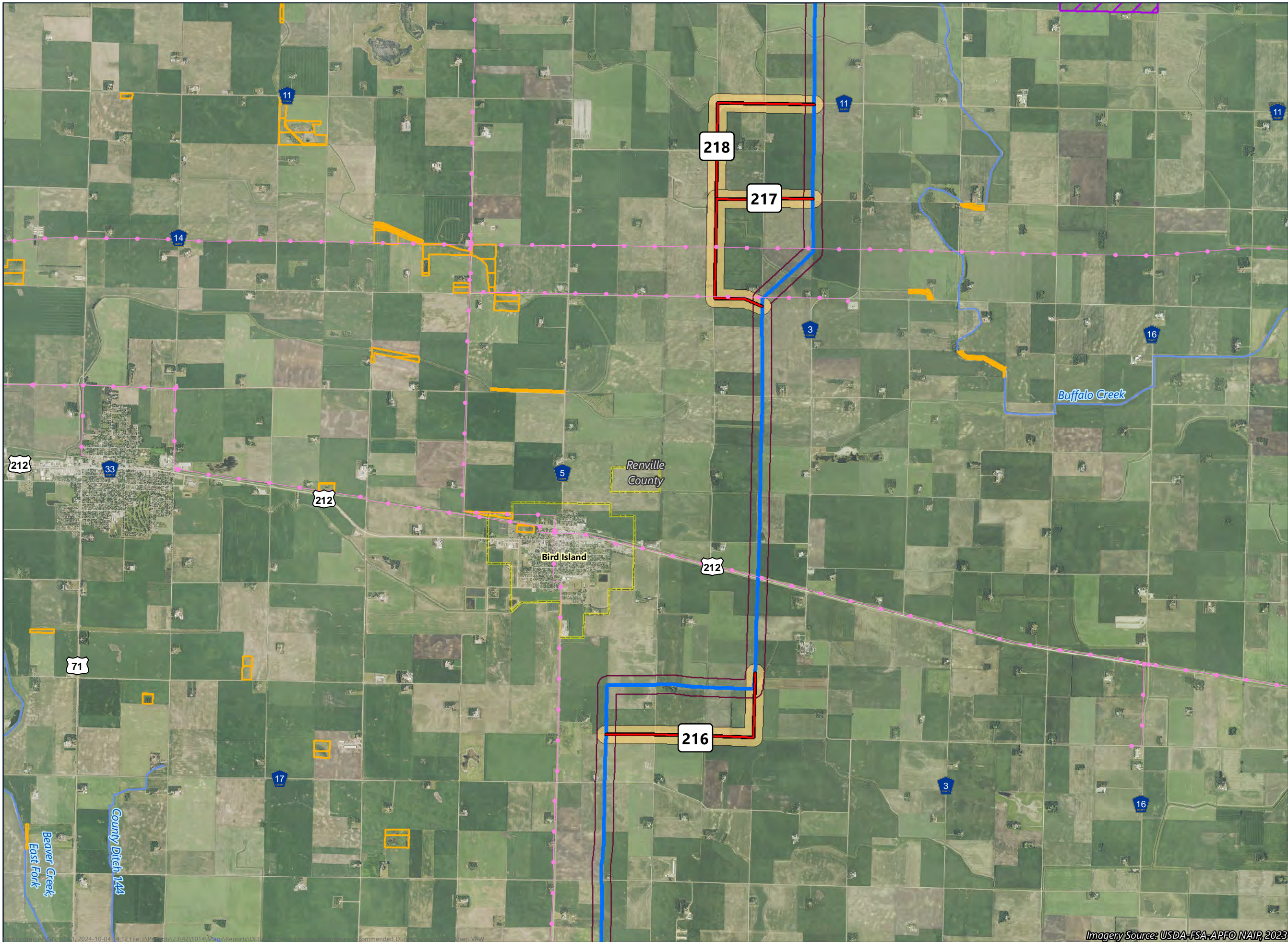
**ROUTE ALTERNATIVES
RECOMMENDED DURING
SCOPING**
Minnesota Energy
Connection Project



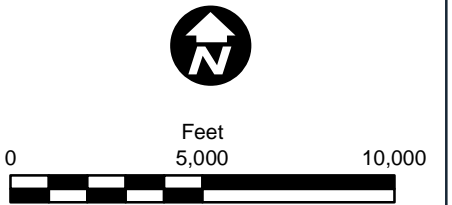
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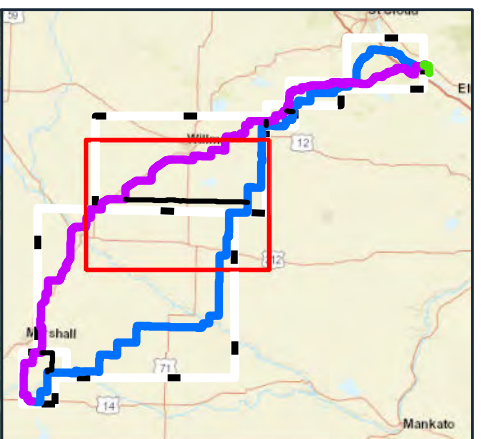
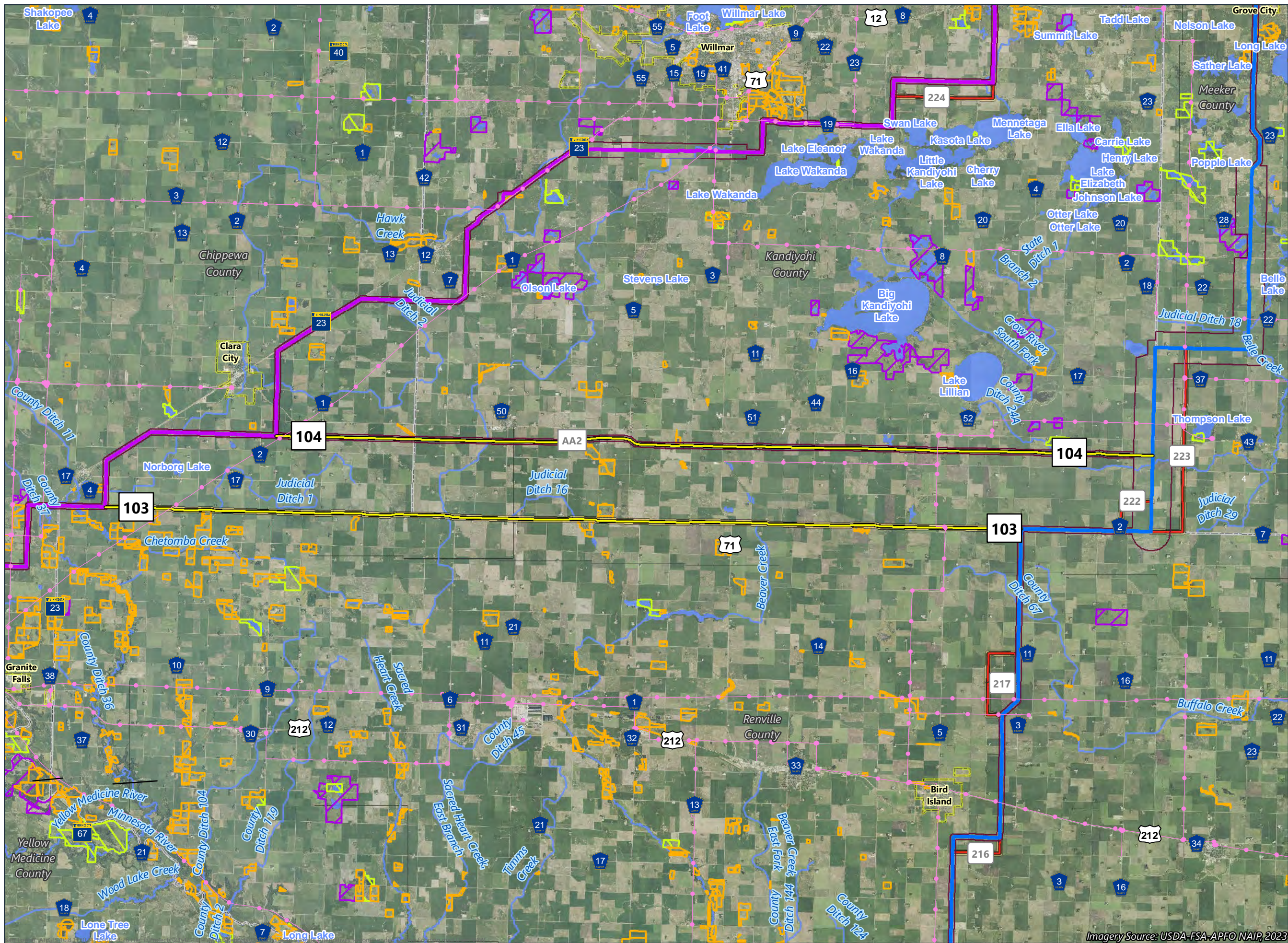
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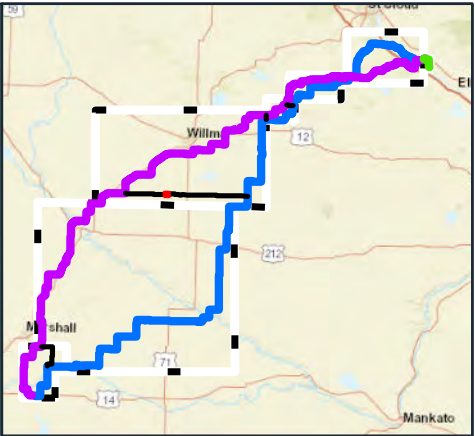
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Map 3-7



Imagery Source: USDA-FSA-APFO NAIP, 2023



Proposed Routes

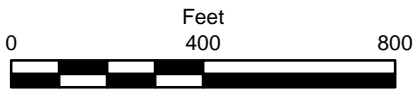
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-  Proposed Route Width

Alternatives

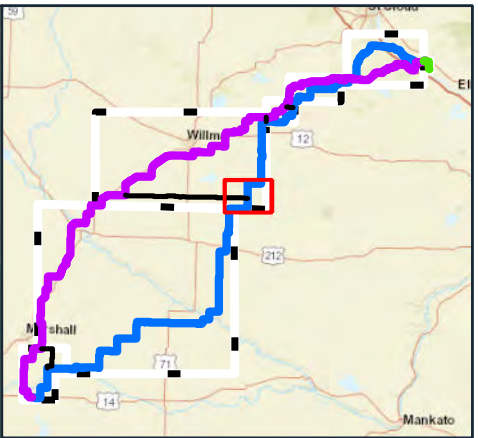
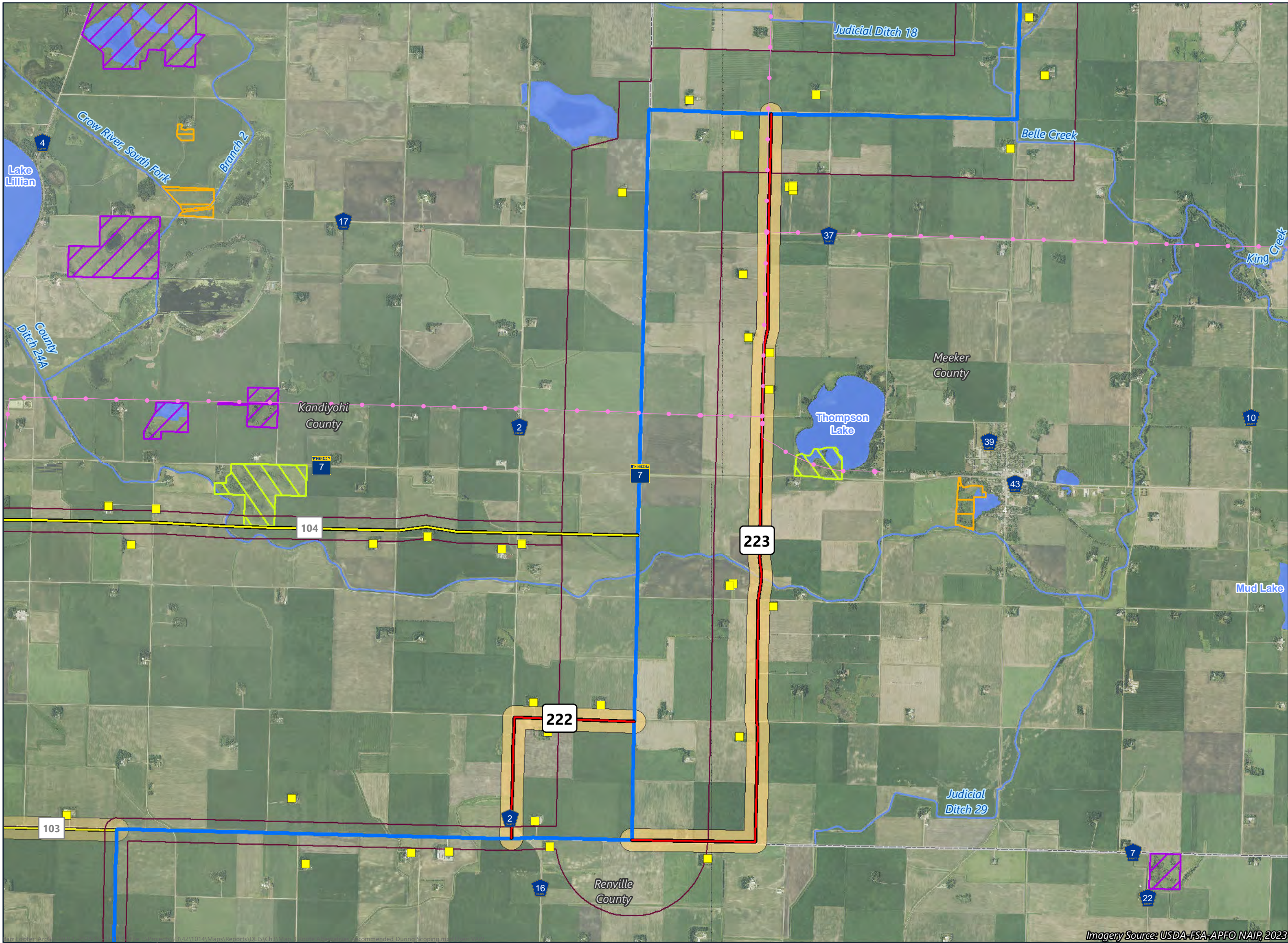
-  Alignment
-  Residence Location

Owner Type

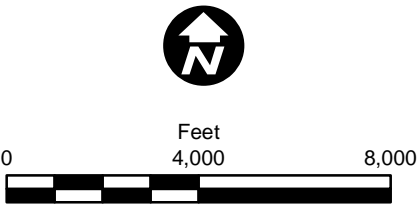
-  Local Land



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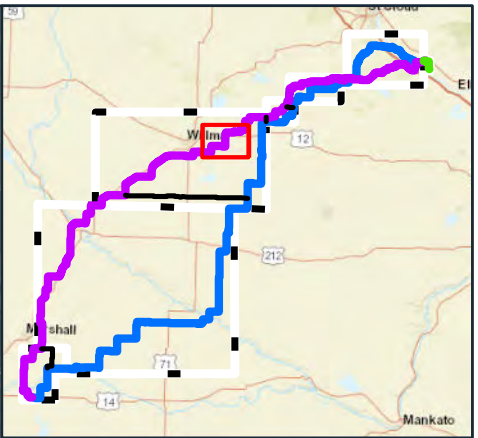
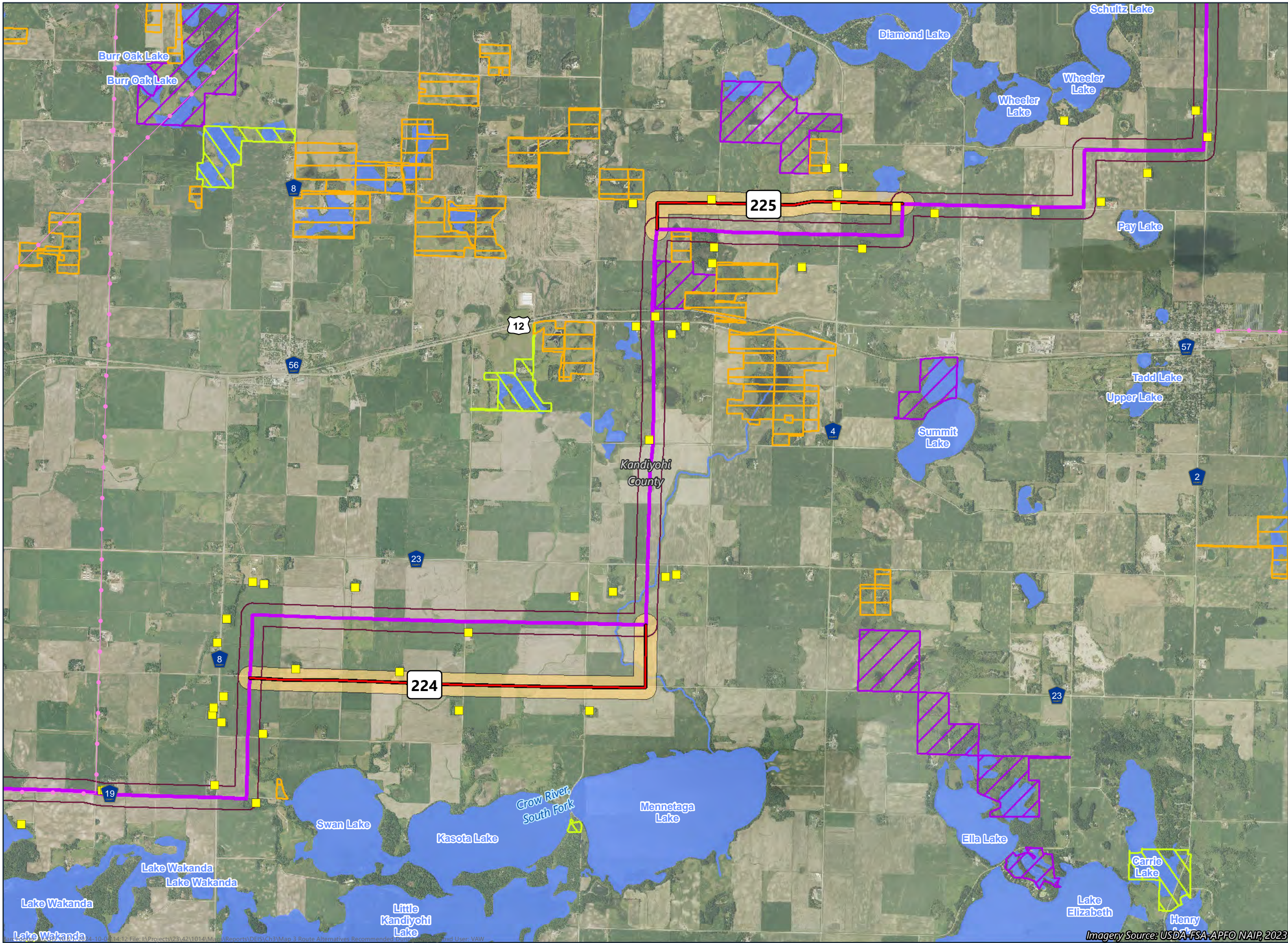
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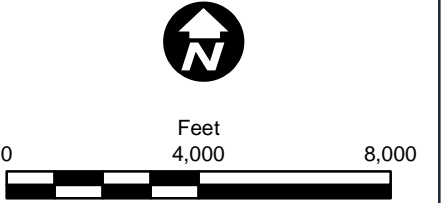
**ROUTE ALTERNATIVES
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Map 3-9

Imagery Source: USDA-FSA-APFO NAIR, 2023

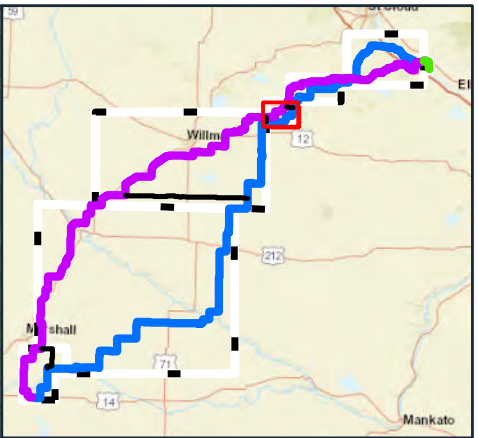
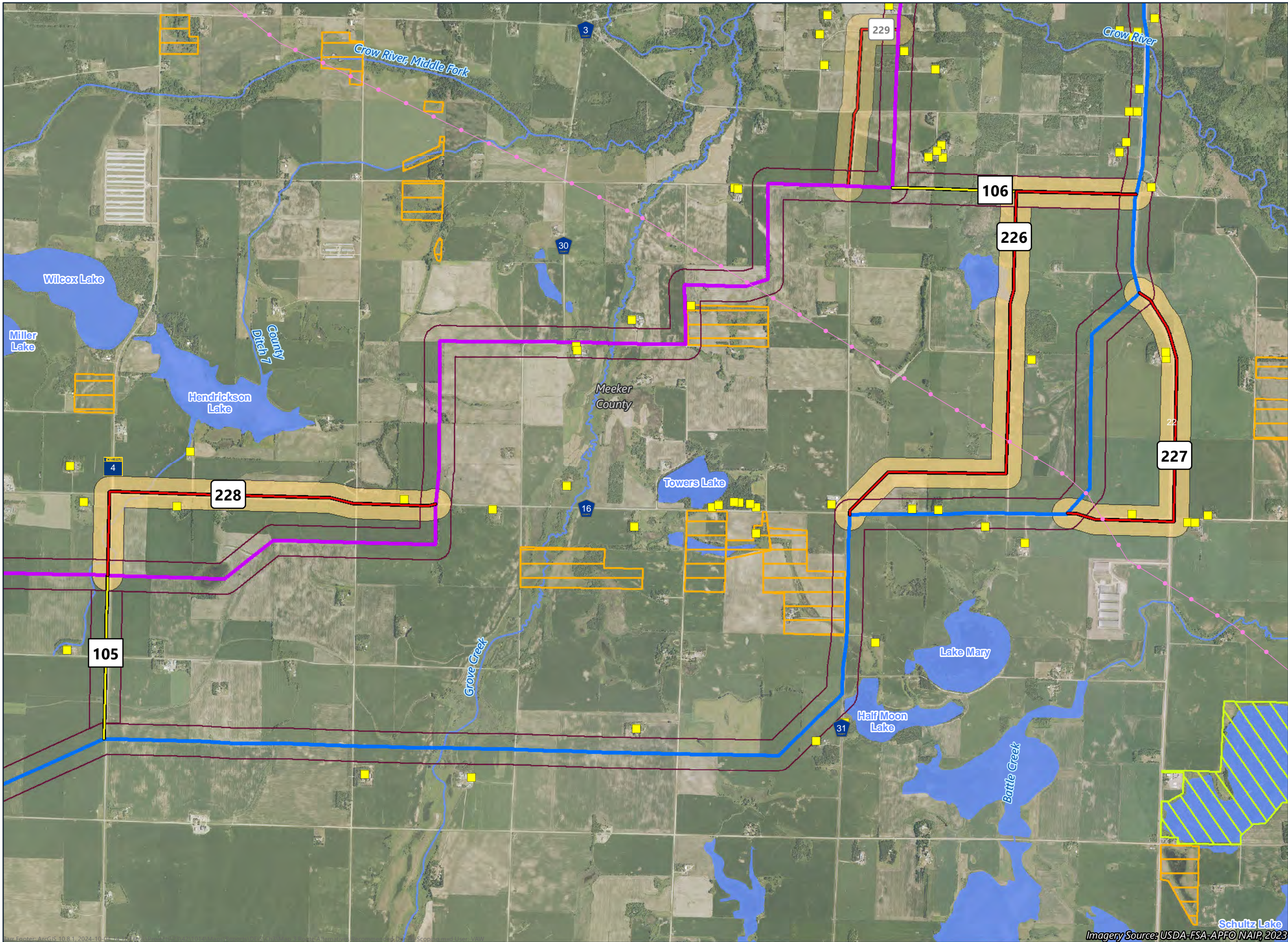


- Proposed Routes**
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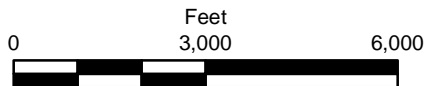


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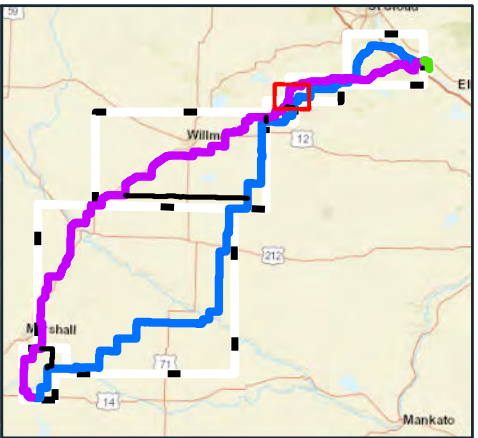
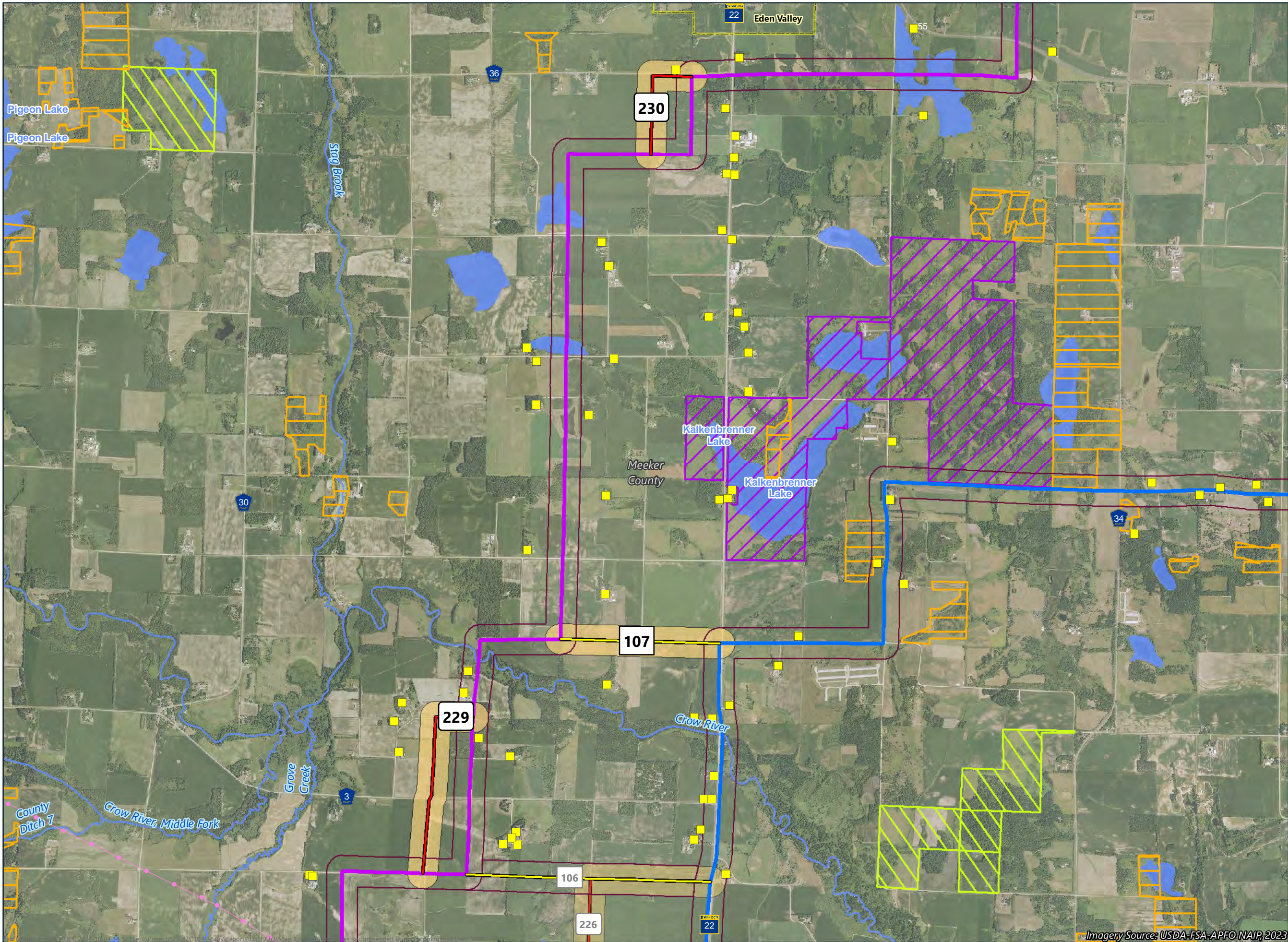
Map 3-10



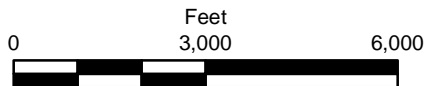
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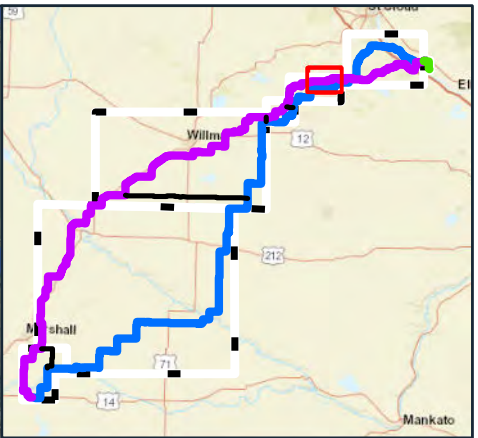
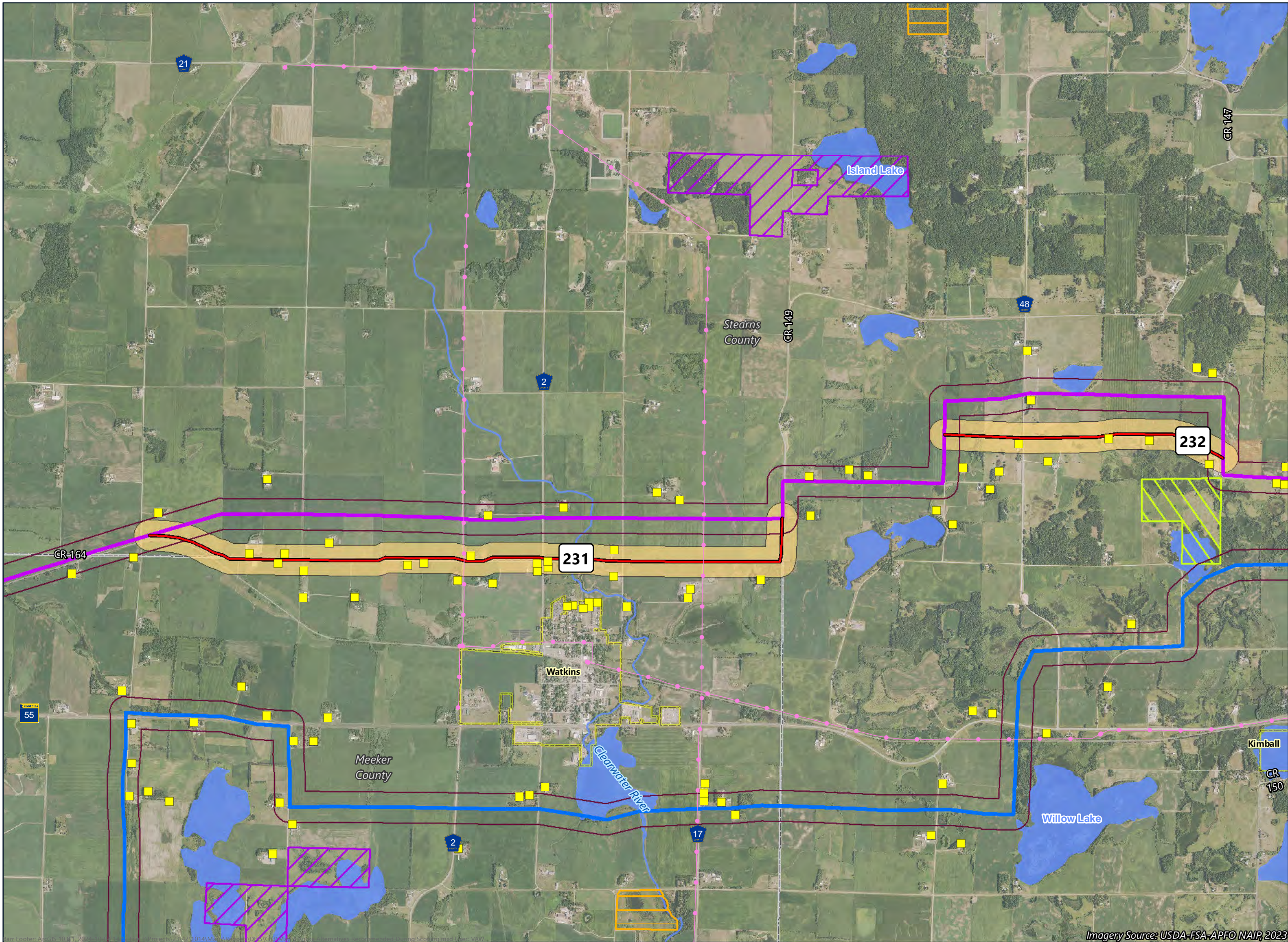
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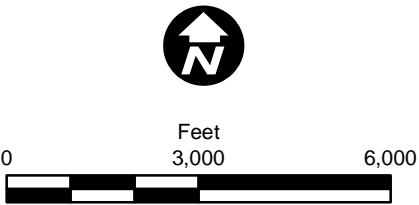
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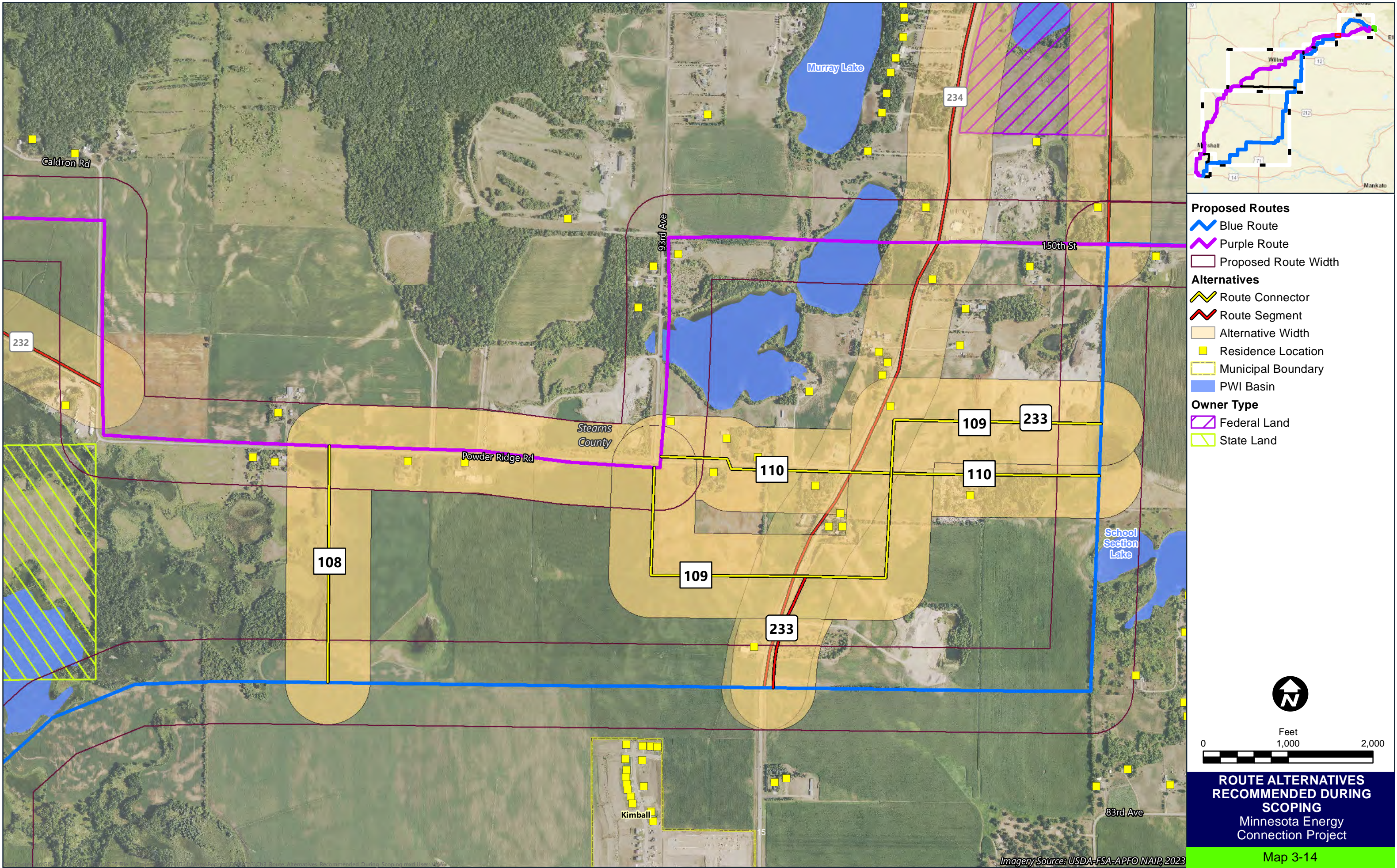
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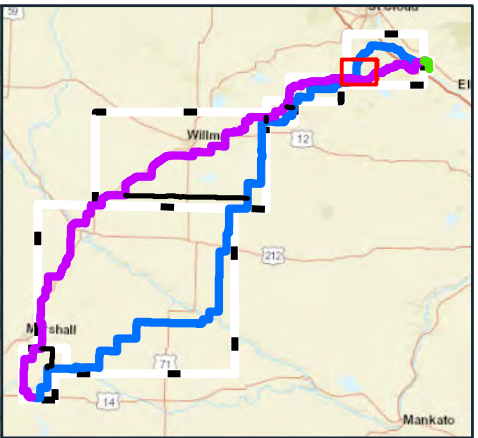
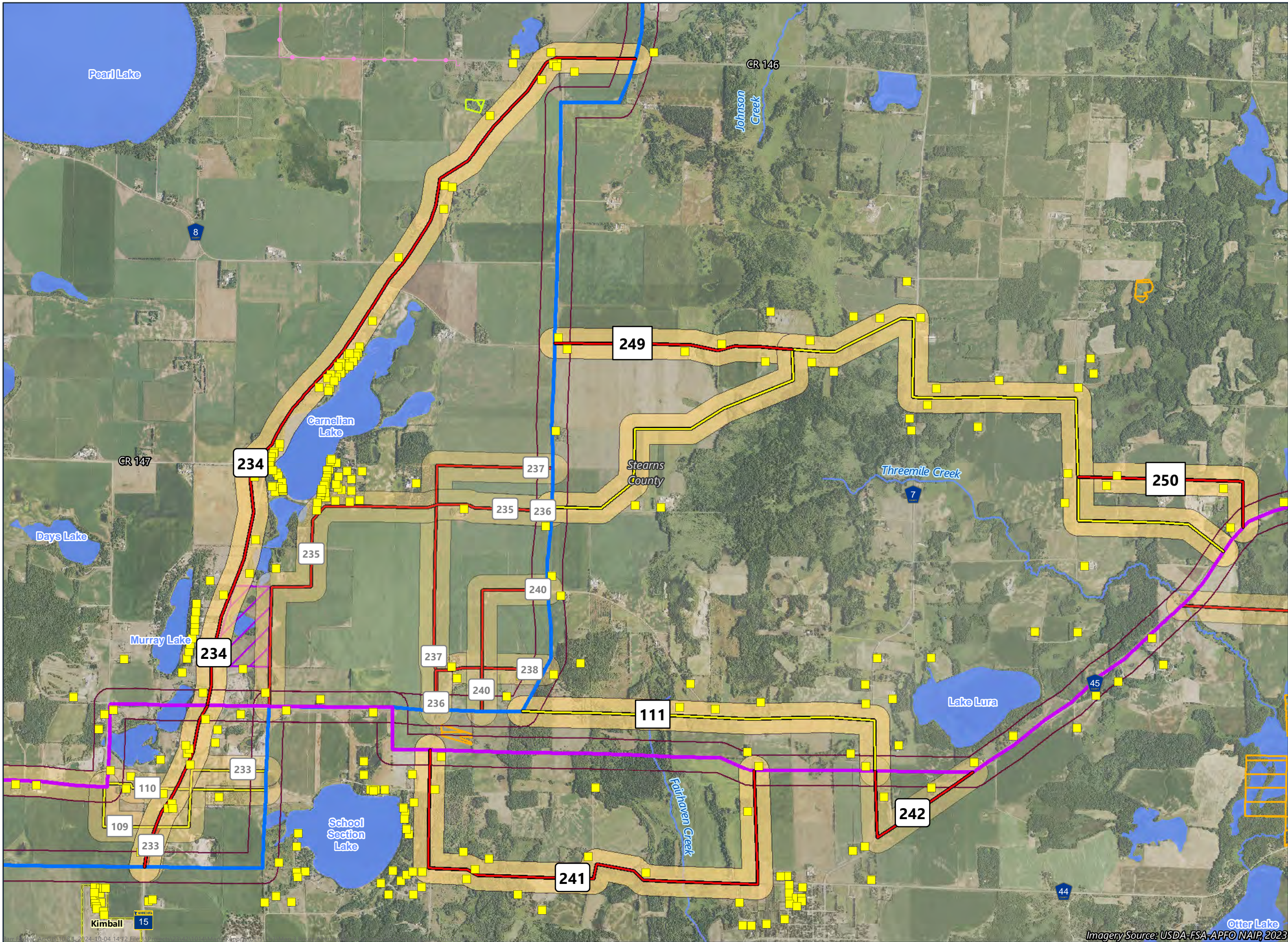


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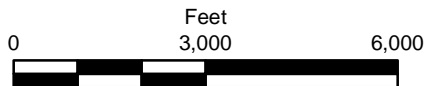


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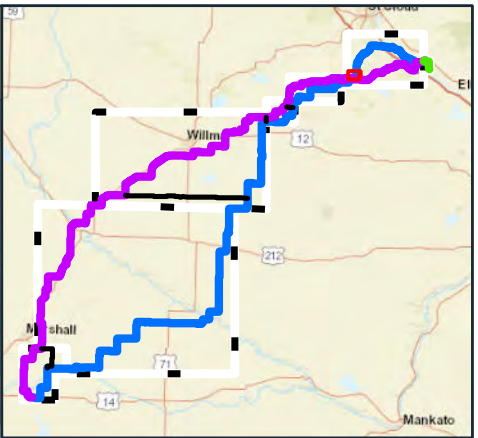
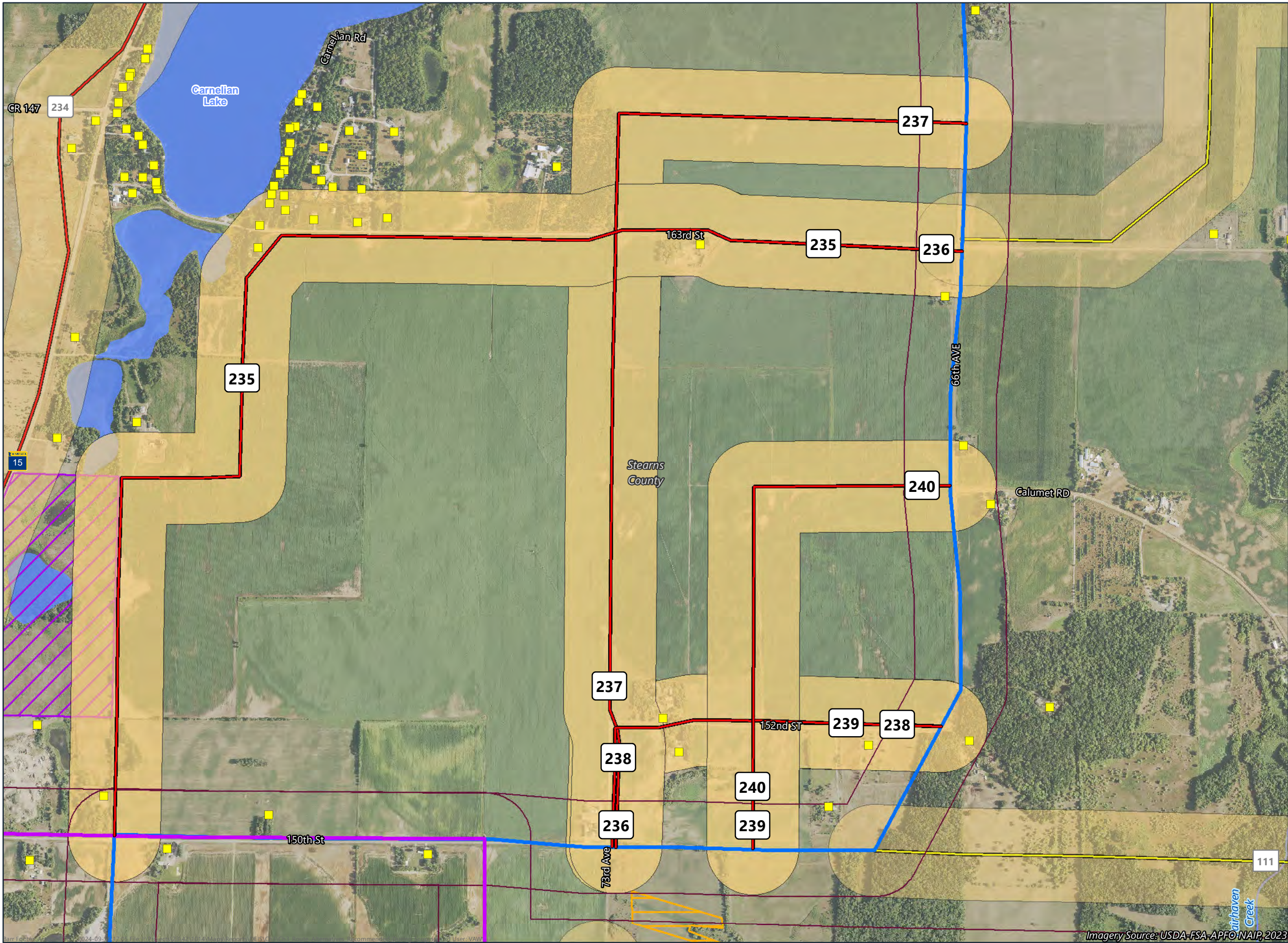




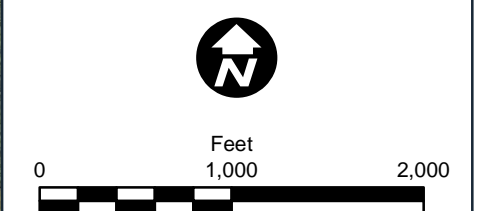
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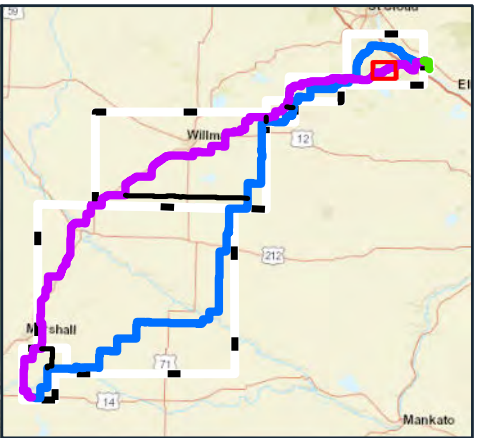
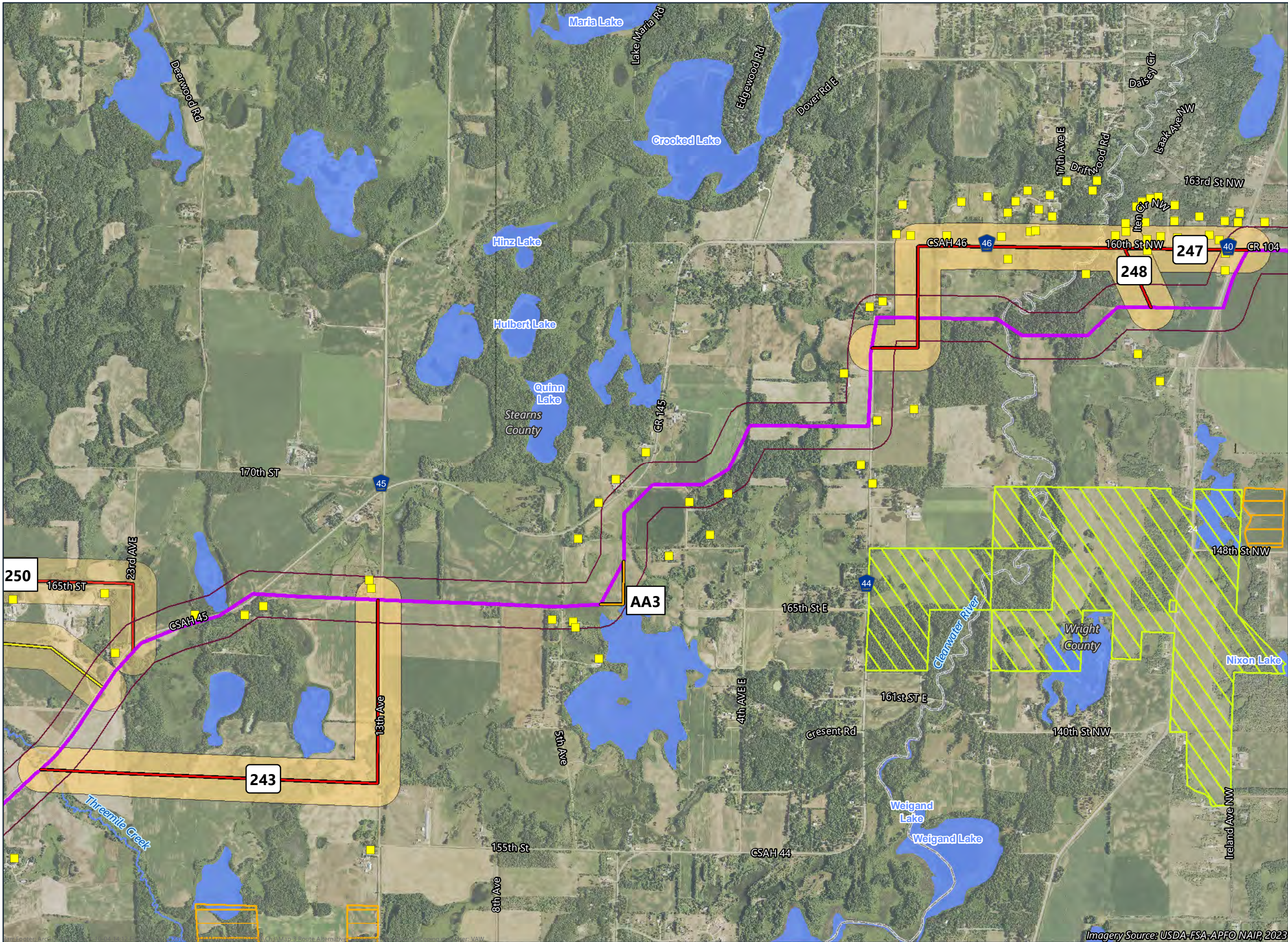


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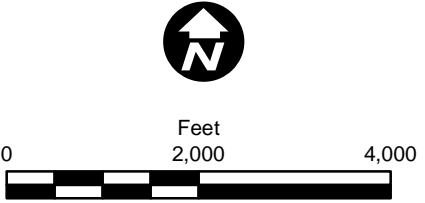


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Map 3-16



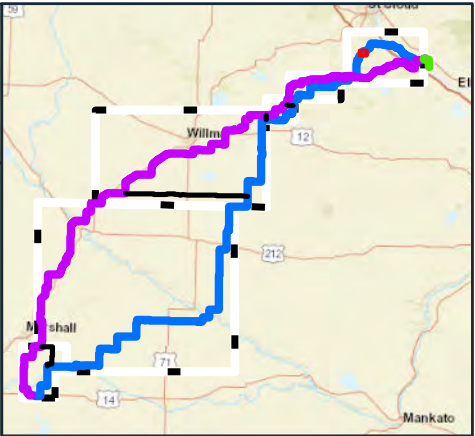
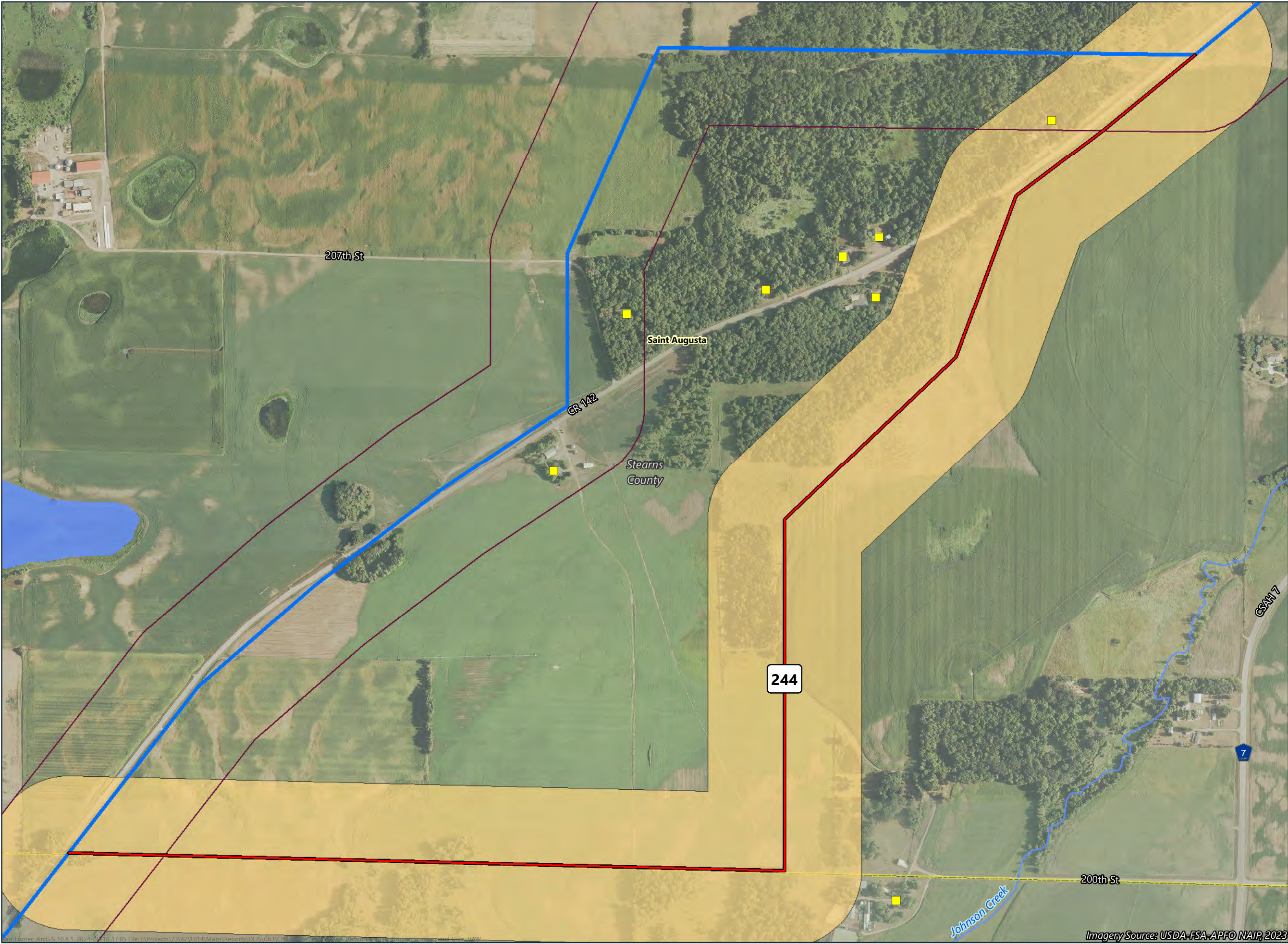
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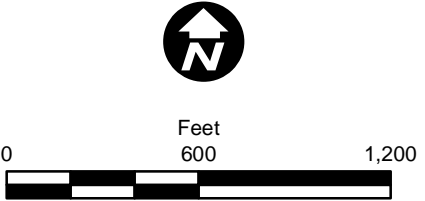
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Map 3-17

Imagery Source: USDA-FSA-APFO NAIP, 2023

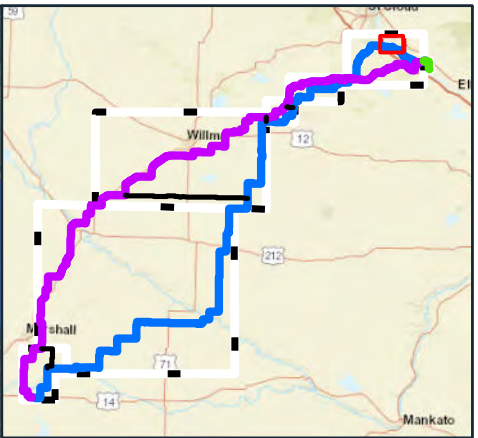
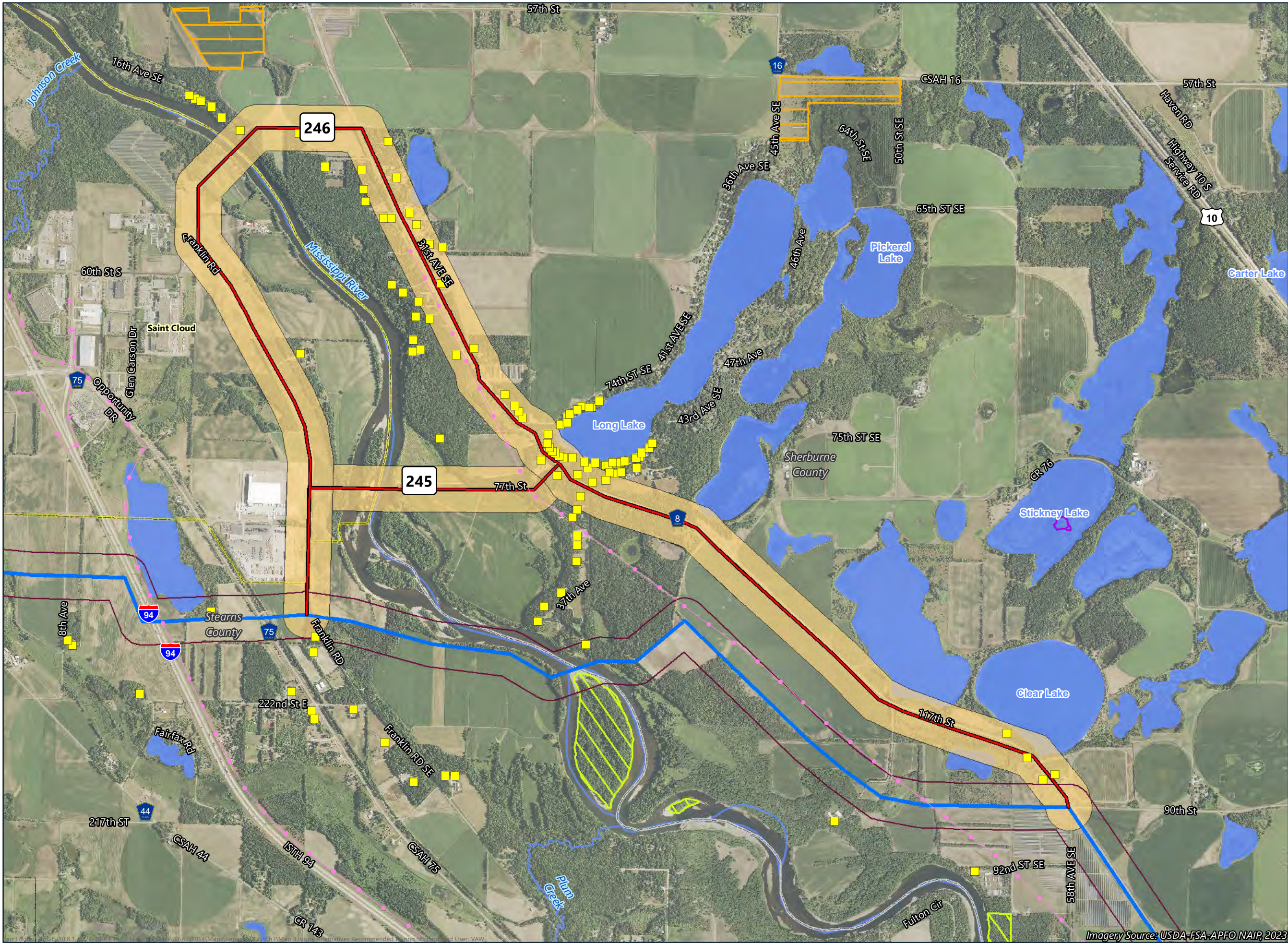


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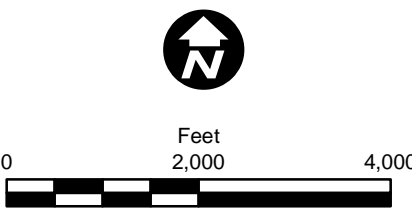


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Map 3-18



- Proposed Routes**
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Attachment D

Proposed Permit Language (Table 1) and Exceptions to ALJ Report (Table 2)

Table 1
Proposed Route Permit Language

ID	Issue	ALJ Report Finding	Sponsor	Location in Draft Permit	Recommended Permit Condition
P1	Tribal Monitoring	229	Bois Forte Band of Chippewa	NEW Special Condition	<u>The Permittee must retain Tribal monitors during ground disturbing activities within a buffer of 250 yards of known historical sites and near the Minnesota River.</u>
P1a	Tribal Monitoring	---	Lower Sioux Indian Community	NEW Special Condition	<u>The Permittee is required to coordinate with the Lower Sioux Indian Community during preconstruction and construction activities near known culturally sensitive areas including, but not limited to, Site 21RW0001. Coordination efforts must include, but is not limited to, Tribal construction monitors. The Permittee must file a preconstruction filing at least 14 days prior to the preconstruction meeting describing the coordination that occurred between the Xcel Energy and the Lower Sioux Indian Community. Xcel Energy must also describe the mitigation and routing strategies taken to avoid impacting the culturally sensitive areas.</u> (Staff)
P2	Calcareous Fens	573	DNR	NEW Special Condition	<u>The Permittee shall work with the DNR to determine if any impacts to calcareous fen will occur during any phase of the Project.</u>
P3	Route Permit Distribution	675	Xcel Energy	5.1	The Permittee shall comply with the following conditions during construction and operation of the Transmission Facility over the life of this route permit. <u>The Permittee may, but is not required to, submit any compliance filings required under this route permit immediately after the Commission's oral decision regarding the route permit and prior to the Commission's written decision.</u>
P4	Field Representative	675	Xcel Energy	5.3.1	The Permittee shall file with the Commission the name, address, email, phone number, and emergency phone number of the field representative at least 14 days prior to the pre-construction meeting. The Permittee shall provide the field representative's contact information to affected landowners, local government units and other interested persons at least 14 days prior to the pre-construction meeting. The Permittee <u>need only provide the field representative's contact information to those landowners that are the subject of the Permittee's vegetation clearing or plan and profile submission, and additional landowners may be notified separately when the Permittee is ready to proceed with vegetation clearing or plan and profile filings for other Transmission Facility areas.</u> The <u>Permittee</u> may change the field representative at any time upon notice to the Commission, affected landowners, local government units and other interested persons. The Permittee shall file with the Commission an affidavit of distribution of its field representative's contact information at least 14 <u>five</u> days prior to the pre-construction meeting and upon changes to the field representative.

ID	Issue	ALJ Report Finding	Sponsor	Location in Draft Permit	Recommended Permit Condition
P5	Application of Pesticides	675	Xcel Energy	5.3.11	<p>The Permittee shall restrict pesticide use to those pesticides and methods of application approved by the Minnesota Department of Agriculture, Minnesota Department of Natural Resources, and the U.S. Environmental Protection Agency. Selective foliage or basal application shall be used when practicable. All pesticides shall be applied in a safe and cautious manner so as not to damage adjacent properties including crops, orchards, tree farms, apiaries, or gardens. The Permittee shall contact the landowner at least 14 days prior to pesticide application on their property. The Permittee may not apply any pesticide if the landowner requests that there be no application of pesticides within the landowner's property. The Permittee shall provide notice of pesticide application to landowners and beekeepers operating <u>Minnesota Department of Agriculture-registered</u> apiaries within three miles of the pesticide application area at least 14 days prior to such application. <u>The Permittee shall use the Minnesota Department of Agriculture's Apiary Registry (https://mn.beecheck.org/map) to identify apiaries for purposes of compliance with this condition.</u> The Permittee shall keep pesticide communication and application records and provide them upon the request of Commerce or Commission staff.</p>
P6	Vegetation Clearing Before Construction	675	Xcel Energy	NEW Special Condition	<p><u>If the Permittee will clear vegetation for any portion of the Transmission Facility prior to completion of the design necessary to provide a plan and profile contemplated under Section 9, the Permittee shall file with the Commission at least 14 days prior to such vegetation clearing activities:</u></p> <ul style="list-style-type: none"> <u>If applicable, any vegetation management plan that is applicable to any portion of the Transmission Facility being proposed for vegetation clearing;</u> <u>A map showing the area proposed for vegetation removal and its location within the Designated Route and compared to the right-of-way identified in this route permit;</u> <u>A statement of confirmation that the Permittee has obtained, or will obtain before commencing, necessary land rights and agency permits for the proposed vegetation removal;</u> <u>The Permittee's plan for notification of field representative for landowners in the identified area; and</u> <u>If the Permittee has made any modifications to the right-of-way or alignment within the Designated Route from that identified in this route permit, the Permittee shall demonstrate that the right-of-way to be cleared of vegetation will be located so as to have comparable overall impacts relative to the factors in Minn. R. 7850.4100, as does the right-of-way and alignment identified in this route permit.</u> <p><u>If the Commission does not notify the Permittee in writing within 14 days after the filing described above that the Commission finds that the filing is not consistent with this route permit, the Permittee may commence vegetation clearing as described in the filing.</u></p>

ID	Issue	ALJ Report Finding	Sponsor	Location in Draft Permit	Recommended Permit Condition
					<u>Staff recommends the above language that is stricken not be included.</u>
P7	Vegetation Clearing Before Construction	Proposed Finding 698	DOC EERA	NEW Special Condition (Modified)	<u>Required permits must be provided prior to vegetation clearing.</u>
P8	Substation Construction	675	Xcel Energy	NEW Special Condition	<u>Notwithstanding any other requirements in this Permit, Permittee may commence construction of the substations identified in Section 2.3 of this Permit, provided that Permittee complies, as applicable, with Sections 9.1 and 9.2 of this Permit with respect to the specific scope of the construction activities sought to be conducted by Permittee.</u>
P9	Pre-Construction Meeting	675	Xcel Energy	9.1	Prior to the start of construction, the Permittee shall participate in a pre-construction meeting with Commerce and Commission staff to review pre-construction filing requirements, scheduling, and to coordinate monitoring of construction and site restoration activities. <u>Multiple pre-construction meetings and submissions under Section 9.2 are allowed.</u> Within 14 days following the pre-construction meeting, the Permittee shall file with the Commission a summary of the topics reviewed and discussed and a list of attendees. The Permittee shall indicate in the filing the anticipated construction start date.
P10	Plan and Profile	675	Xcel Energy	9.2	. . . If the Commission notifies the Permittee in writing within 30 days after the pre-construction meeting that it has completed its review of the documents and planned construction, and finds that the planned construction is not consistent with this route permit, the Permittee may submit additional and/or revised documentation and may not commence construction until the Commission has notified the Permittee in writing that it has determined that the planned construction is consistent with this route permit. <u>If the Commission does not notify the Permittee in writing within 30 days after the preconstruction meeting that the Commission finds that the planned construction is not consistent with this route permit, the Permittee may commence construction.</u> . . .
P11	Saint Augusta	Proposed Finding 698	DOC EERA	NEW Special Condition	<u>If the Commission selects a route including Route Segment G1 (Blue Route) or Route Segment G2, further coordination with the city of Augusta would be required to further understand potential mitigation required for impacts to the city's ongoing residential development. Proof of this coordination shall be filed 14 days prior to the plan and profile submittal for this location.</u>
P12	Public Safety Emergency Response Plan	Proposed Finding 698	DOC EERA	NEW Special Condition	<u>The Permittee shall file a public version of its public safety emergency response plan 14 days prior to its last plan and profile submittal.</u>

ID	Issue	ALJ Report Finding	Sponsor	Location in Draft Permit	Recommended Permit Condition
P13	Groundwater	Proposed Finding 698	DOC EERA	NEW Special Condition	<u>The Permittee shall conduct geotechnical evaluations prior to project construction to identify locations where potential groundwater impacts could occur. If shallow depths to groundwater resources are identified during geotechnical design of the project, the Permittee shall employ specialty structures with wider, shallower foundations. These locations shall be shown on the plan and profile submitted for the project, and appropriate mitigation measures be identified as part of the filing.</u>
P14	Protected Species	Proposed Finding 698	DOC EERA	NEW Special Condition	<u>The Permittee shall coordinate with the DNR to avoid adverse impacts to protected species and implement appropriate, species-specific BMPs if project activities take place during any of the species' active seasons. Proof of this coordination shall be filed with the respective plan and profile submittal(s) for the Project.</u>
P15	Lighting	Proposed Finding 698	DOC EERA	NEW Special Condition	<u>The Permittee shall utilize downward facing lighting on associated facilities. If LED lights are used, the Permittee shall follow MnDOT Approved Products for luminaries and a nominal color temperature below 2700K. If available, the Permittee shall choose products that have the lowest number for backlight and glare.</u>
P16	Dust Control	Proposed Finding 698	DOC EERA	NEW Special Condition	<u>The Permittee shall not use dust control products that contain chlorides to avoid the potential for chloride products accumulating to levels that are toxic to plants and wildlife.</u>
P17	Decommissioning Plan	Proposed Finding 698	DOC EERA	NEW Special Condition	<u>The Permittee shall file a decommissioning plan 14 days prior to the last preconstruction meeting for the Project.</u>
P18	Labor Reporting	---	LIUNA	NEW Special Condition	<p>LIUNA recommended that the Commission require labor statistics reporting for the MNEC Project. Staff recommends the following language that is used in other Commission permits:</p> <p><u>Labor Statistic Reporting</u></p> <p><u>The Permittee shall file quarterly Labor Statistic Reports with the Commission within 45 days of the end of the quarter regarding construction workers that participated in the construction of the Project. The Labor Statistic Reports shall:</u></p> <p><u>A. detail the Permittee's efforts and the site contractor's efforts to hire Minnesota workers; and</u></p> <p><u>B. provide an account of:</u></p>

ID	Issue	ALJ Report Finding	Sponsor	Location in Draft Permit	Recommended Permit Condition
					<p><u>1. the gross number of hours worked by or full-time equivalent workers who are Minnesota residents, as defined in Minn. Stat. § 290.01, subd. 7;</u></p> <p><u>2. the gross number of hours worked by or full-time equivalent workers who are residents of other states, but maintain a permanent residence within 150 miles of the Project; and</u></p> <p><u>3. the total gross hours worked or total full-time equivalent workers.</u></p> <p><u>The Permittee shall work with its contractor to determine the suitable reporting metric. The report may not include personally identifiable data.</u></p> <p><u>Prevailing Wage</u></p> <p><u>The Permittee, its contractors, and subcontractors shall pay no less than the prevailing wage rate as defined in Minn. Stat. § 177.42 and shall be subject to the requirements and enforcement provisions under Minn. Stat. §§ 177.27, 177.30, 177.32, 177.41 to 177.435, and 177.45. The Permittee shall keep records of contractor and subcontractor pay and provide them at the request of Commerce or Commission staff.</u></p>

Table 2
Exceptions to ALJ Report

ID	ALJ Report Location	Sponsor	Recommended Modification to ALJ Report Language																								
E1	Summary of Recommendations (3rd paragraph)	DOC EERA	The Administrative Law Judge further concludes that the Applicant has satisfied all relevant criteria set forth in Minnesota law for a route permit for the Project and recommends that the Commission grant a route permit for the Applicant’s Preferred Route, as identified in the Direct Testimony of Matthew Langan, with modification to include the northern most portion of Route Segment 223 as described in Finding 215, <u>and modified by EERA staff.</u>																								
E2	Summary of Recommendations (3rd paragraph)	Xcel Energy	The Administrative Law Judge further concludes that the Applicant has satisfied all relevant criteria set forth in Minnesota law for a route permit for the Project and recommends that the Commission grant a route permit for the Applicant’s Preferred Route, as identified in the Direct Testimony of Matthew Langan, with modification to include <u>Alternative Alignment 1 (or, AA1) and</u> the northern most portion of Route Segment 223 as described in Finding 215.																								
E3	Finding 215	Xcel Energy	<p>Because a short length of the modified Route Segment 223 is not within a route width studied in the DEIS, Xcel Energy provided a <u>map depicting modified Route Segment 223 and a</u> table summarizing the potential human and environmental impacts of this segment. <u>As shown on the map and table, the parcels crossed by the modified segment were already crossed by routes studied in the EIS, and there is information concerning the potential human and environmental impacts of this segment in the record. [footnote] That information supports the selection of modified Route Segment 223, rather than the corresponding section of the Blue Route or the unmodified Route Segment 223.</u></p> <p>Footnote: <u>Langan Direct at 13:1-5 and 14:1-2.</u></p>																								
E4	NEW Finding 219a	DOC EERA (195)	<p><u>In its January 29, 2025, EERA Comments on Xcel Energy’s Proposed Findings of Fact, Conclusions of Law, and Recommendations, EERA staff made its route recommendations as compared to the Applicant’s Preferred Route.</u></p> <table><tr><th>Region</th><th>EERA Route Recommendations</th><th>Xcel Energy Preferred Route</th></tr><tr><td><u>A</u></td><td><u>A6 (Blue)</u></td><td><u>A6 (Blue)</u></td></tr><tr><td><u>B</u></td><td><u>B4 + 216 + 211 + AA1 + 220 (Blue)</u></td><td><u>B4 + 212 + 216 + 219 (Blue)</u></td></tr><tr><td><u>C</u></td><td><u>C4 (Blue) + 223</u></td><td><u>C4 (Blue)</u></td></tr><tr><td><u>D</u></td><td><u>D5 (Blue)</u></td><td><u>D5 (Blue)</u></td></tr><tr><td><u>E</u></td><td><u>E2 (Blue)</u></td><td><u>E2 (Blue)</u></td></tr><tr><td><u>F</u></td><td><u>F4 (Blue)</u></td><td><u>F4 (Blue)</u></td></tr><tr><td><u>G</u></td><td><u>G1 + 244 (Blue)</u></td><td><u>G1 + 244 (Blue)</u></td></tr></table>	Region	EERA Route Recommendations	Xcel Energy Preferred Route	<u>A</u>	<u>A6 (Blue)</u>	<u>A6 (Blue)</u>	<u>B</u>	<u>B4 + 216 + 211 + AA1 + 220 (Blue)</u>	<u>B4 + 212 + 216 + 219 (Blue)</u>	<u>C</u>	<u>C4 (Blue) + 223</u>	<u>C4 (Blue)</u>	<u>D</u>	<u>D5 (Blue)</u>	<u>D5 (Blue)</u>	<u>E</u>	<u>E2 (Blue)</u>	<u>E2 (Blue)</u>	<u>F</u>	<u>F4 (Blue)</u>	<u>F4 (Blue)</u>	<u>G</u>	<u>G1 + 244 (Blue)</u>	<u>G1 + 244 (Blue)</u>
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E5	NEW Finding 222a	DOC EERA (200) and Xcel Energy	<u>Public information and scoping meetings were held as follows:</u>																								

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			<table><tr><th>Date</th><th>Time</th><th>Meeting Location</th></tr><tr><td>January 24, 2024</td><td>10:00 a.m. (doors open pre-meeting hour) 11:00 a.m. - 1:00 p.m. (formal meeting)</td><td>Kilowatt Community Center 600 Kilowatt Drive Granite Falls, MN 56241</td></tr><tr><td>January 24, 2024</td><td>5:00 p.m. (doors open pre-meeting hour) 6:00 p.m. – 8:00 p.m. (formal meeting)</td><td>EverSpring Inn & Suites 1500 East College Drive Marshall, MN 56258</td></tr><tr><td>January 25, 2024</td><td>10:00 a.m. (doors open pre-meeting hour) 11:00 a.m. - 1:00 p.m. (formal meeting)</td><td>Max's Grill 2425 West Lincoln Avenue Olivia, MN 56277</td></tr><tr><td>January 25, 2024</td><td>5:00 p.m. (doors open pre-meeting hour) 6:00 p.m. – 8:00 p.m. (formal meeting)</td><td>Redwood Area Community Center 901 East Cook Street Redwood Falls, MN 56283</td></tr><tr><td>January 30, 2024</td><td>5:00 p.m. (doors open pre-meeting hour) 6:00 p.m. – 8:00 p.m. (formal meeting)</td><td>Litchfield Civic Arena 900 North Gilman Avenue Litchfield, MN 55355</td></tr><tr><td>January 31, 2024</td><td>10:00 a.m. (doors open pre-meeting hour) 11:00 a.m. - 1:00 p.m. (formal meeting)</td><td>Monticello Community Center 505 Walnut Street Monticello, MN 55362</td></tr><tr><td>January 31, 2024</td><td>5:00 p.m. (doors open pre-meeting hour) 6:00 p.m. – 8:00 p.m. (formal meeting)</td><td>Kimball Community Schools Cafetorium 100 Highway 55 West Kimball, MN 55353</td></tr><tr><td>February 1, 2024</td><td>6:00 p.m.</td><td>Virtual Meeting Webex Platform</td></tr></table>	Date	Time	Meeting Location	January 24, 2024	10:00 a.m. (doors open pre-meeting hour) 11:00 a.m. - 1:00 p.m. (formal meeting)	Kilowatt Community Center 600 Kilowatt Drive Granite Falls, MN 56241	January 24, 2024	5:00 p.m. (doors open pre-meeting hour) 6:00 p.m. – 8:00 p.m. (formal meeting)	EverSpring Inn & Suites 1500 East College Drive Marshall, MN 56258	January 25, 2024	10:00 a.m. (doors open pre-meeting hour) 11:00 a.m. - 1:00 p.m. (formal meeting)	Max's Grill 2425 West Lincoln Avenue Olivia, MN 56277	January 25, 2024	5:00 p.m. (doors open pre-meeting hour) 6:00 p.m. – 8:00 p.m. (formal meeting)	Redwood Area Community Center 901 East Cook Street Redwood Falls, MN 56283	January 30, 2024	5:00 p.m. (doors open pre-meeting hour) 6:00 p.m. – 8:00 p.m. (formal meeting)	Litchfield Civic Arena 900 North Gilman Avenue Litchfield, MN 55355	January 31, 2024	10:00 a.m. (doors open pre-meeting hour) 11:00 a.m. - 1:00 p.m. (formal meeting)	Monticello Community Center 505 Walnut Street Monticello, MN 55362	January 31, 2024	5:00 p.m. (doors open pre-meeting hour) 6:00 p.m. – 8:00 p.m. (formal meeting)	Kimball Community Schools Cafetorium 100 Highway 55 West Kimball, MN 55353	February 1, 2024	6:00 p.m.	Virtual Meeting Webex Platform
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E6	NEW Finding 222b	DOC EERA (201)	<p>The purpose of these meetings was to (1) provide information to the public about the proposed project and the state's high-voltage transmission line certificate of need and route permitting processes; and (2) provide members of the public an opportunity to participate in developing the scope of the EIS. This includes commenting on issues or concerns related to the proposed project and proposing alternatives for consideration.</p> <p>Footnote: Ex. PUC 4 at 1 (Public Information and Scoping Meeting Notice).</p>																											
E7	NEW Finding 222c	DOC EERA (202)	<p>As identified in Section II above, from January 8, 2024, to February 21, 2024, members of the public and stakeholders submitted written comments regarding the Project and the scope of the EIS to be prepared by EERA for the Project.</p> <p>Footnote: Ex. PUC 4 at 3 (Public Information and Scoping Meeting Notice).</p>																											
E8	NEW Finding 360a	DOC EERA (361)	<p>Residential properties would be boxed in with existing transmission lines 200 kV or higher voltage transmission lines along Route Segments B1, B2, B3, B4, C1, C2, G3, G4, G5, G6, and Route Segment 245.</p> <p>Footnote: FEIS at 249, 298, 415, and 449.</p>																											
E9	Finding 416	Xcel Energy	Route Segment A4 includes public lands and the Amiret Wildlife Management Area with an access point to the area directly parallel to the anticipated alignment. Other recreational resources in Region A include snowmobile																											

ID	ALJ Report Location	Sponsor	Recommended Modification to ALJ Report Language
			trails and impacts are anticipated to be minimal. <u>Alternative Alignment 1 would minimize impacts to existing conservation easements.</u>
E10	Finding 501	Xcel Energy	Xcel Energy stated that it does not support preparing a decommissioning plan for the Project because a decommissioning plan would be speculative and not useful for an asset like the Project that does not have a specific service life. Further, Xcel Energy is a rate-regulated utility subject to the ongoing jurisdiction of the Commission. <u>For these reasons, the record does not support requiring a decommissioning plan for the Project. At the time of decommissioning, a decommission plan established by Xcel Energy, subject to approval by the Commission, is a reasonable permit condition.</u>
E11	Finding 512	DOC EERA (501)	Most of the land within the Project area is used for agricultural purposes, and general impacts are not anticipated to vary significantly among route alternatives. Although, as noted above, a portion of the Blue Route (Routes C2, C3, and C4) could impact the Lux Airstrip. <u>EERA staff recommends the Commission select Route Segment 223 to avoid these impacts.</u> Xcel Energy identified a modified Route Segment 223 to avoid these impacts additional residential impacts in that segment. The northern portion of the Project also includes the highest concentration of center pivot irrigation systems; these systems exist on both the Blue and Purple Routes.
E12	Finding 573	Xcel Energy	In MDNR's comments on the DEIS, MDNR requested, and the Administrative Law Judge recommends, a special permit condition requiring Xcel Energy to work with the MDNR <u>if the Purple Route is selected</u> to determine if any impacts to the calcareous fen will occur during any phase of the Project.
E13	Finding 604	DOC EERA (619)	All route segments would intersect wetlands. Xcel Energy's Preferred Route includes 138 acres of NWI wetlands within its right-of-way, as compared to: 145 acres within the MDNR proxy end-to-end route; 152 acres within the Blue Route; and 135 acres within the Purple Route. <u>The Preferred Route as modified by EERA staff intersects 134 acres of wetlands.</u>
E14	Finding 638	DOC EERA (665)	Xcel Energy's Preferred Route and the MDNR proxy route following existing rights-of-way or parcel, section, and division lines for approximately 91 percent of their length, as compared to approximately 89 percent for the Blue and Purple Routes. <u>The Preferred Route as modified by EERA staff also follows existing rights-of-way and/or parcel, section, and division lines for approximately 91 percent of its length.</u>
E15	Finding 638	Xcel Energy	Xcel Energy's Preferred Route and the MDNR proxy route following existing rights-of-way or parcel, section, and division lines for approximately 91 percent of their length, as compared to approximately 89 percent for the Blue and Purple Routes. <u>The record reflects a consideration of routing along existing high voltage transmission line and highway rights-of-way. Routes use or follow those rights-of-way to the extent feasible, but following those rights-of-way for the entirety of the Project is not feasible for the reasons discussed in Paragraph 637 and elsewhere in this Report.</u>

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E16	Finding 645	DOC EERA (672)	The Preferred Route, Blue Route, and MDNR proxy route would each require 12 crossings of existing transmission lines 115-kV or greater. The Purple Route would require 23 such crossings. <u>The Preferred Route as modified by EERA staff makes seven crossings.</u>																												
E17	Finding 648	DOC EERA (674)	Xcel Energy’s Preferred Route minimizes reliability risks with respect to crossings of existing lines. The Purple Route (including its crossing of the Mississippi River) has approximately twice as many line crossings as the Preferred Route. <u>The Preferred Route as modified by EERA staff further reduces the number of crossings.</u>																												
E18	Finding 657 (Table 10)	DOC EERA (683 Table 10)	<table><tr><th></th><th>Preferred Route</th><th>MDNR Route</th><th>Blue Route</th><th>Purple Route</th><th>Route Option C</th><th>Route Option D</th></tr><tr><td>Total (rounded to nearest million)</td><td>\$773 million</td><td>\$802 million</td><td>\$767 million</td><td>\$787 million</td><td>\$815 million</td><td>\$805 million</td></tr></table> <table><tr><th>Preferred Route</th><th>MDNR Route</th><th>EERA Route</th><th>Blue Route</th><th>Purple Route</th><th>Route Option C</th><th>Route Option D</th></tr><tr><td>\$773 million</td><td>\$802 million</td><td>\$787 million</td><td>\$767 million</td><td>\$787 million</td><td>\$815 million</td><td>\$805 million</td></tr></table>		Preferred Route	MDNR Route	Blue Route	Purple Route	Route Option C	Route Option D	Total (rounded to nearest million)	\$773 million	\$802 million	\$767 million	\$787 million	\$815 million	\$805 million	Preferred Route	MDNR Route	EERA Route	Blue Route	Purple Route	Route Option C	Route Option D	\$773 million	\$802 million	\$787 million	\$767 million	\$787 million	\$815 million	\$805 million
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E19	Finding 671	DOC EERA (692)	In its Response to Hearing Comments, Xcel Energy also provided a comparison of Xcel Energy’s Preferred Route, the Blue Route, the Purple Route, and a proxy MDNR end-to-end route. The table included in Xcel Energy’s comments is replicated below for ease of reference. Xcel Energy acknowledges that the table does not include a comparison of every resource category. Instead, it includes the criteria as to which there are material differences among the routes. <u>In its January 29, 2025, EERA Comments on Xcel Energy’s Proposed Findings of Fact, Conclusions of Law, and Recommendations, EERA staff made its route recommendations as compared to the Applicant’s Preferred Route and is included in Table 11.</u>																												

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E20	Finding 673	DOC EERA (693)	The Preferred Route <u>as modified by EERA staff</u> is consistent with the Commission’s routing criteria and best balances and minimizes potential impacts, considering each of those criteria (including, but not limited to, residential impacts, natural resources, reliability, and cost). The <u>original Preferred Route</u> , Blue Route, Purple Route, and an MDNR route may offer benefits as to one routing factor or another, but each invite countervailing negative impacts on other factors.																																																																								
E21	Finding 673	Xcel Energy	The Preferred Route, <u>with the inclusion of AA1 and the northernmost portion of Route Segment 223 as described in Finding 215</u> , is consistent with the Commission’s routing criteria and best balances and minimizes potential impacts, considering each of those criteria (including, but not limited to, residential impacts, natural resources, reliability, and cost). The Blue Route, Purple Route, and an MDNR route may offer benefits as to one routing factor or another, but each invite countervailing negative impacts on other factors.																																																																								

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E22	NEW Finding 675a	DOC EERA (696)	<u>EERA staff recommended changes to Xcel Energy’s new special permit condition 6.1 regarding vegetation removal. EERA staff recommends that in addition to any vegetation management plan being provided, that any required permits be provided prior to the vegetation clearing.</u>
E23	Finding 676	DOC EERA (697)	The revisions to the Draft Route Permit requested by Xcel Energy in its December 2024 Response to Hearing Comments, <u>as modified by EERA staff</u> , are reasonable, supported by the record and the Administrative Law Judge recommends their inclusion. With these additions, the revised Draft Route Permit would protect human life and environmental features in the Project area.
E24	NEW Finding 676a	DOC EERA (698)	<p><u>The FEIS discussed measures to mitigate potential impacts. EERA staff recommended the following permit conditions:</u></p> <p><u>If the Commission selects a route including Route Segment G1 (Blue Route) or Route Segment G2, further coordination with the city of Augusta would be required to further understand potential mitigation required for impacts to the city’s ongoing residential development. Proof of this coordination shall be filed 14 days prior to the plan and profile submittal for this location.</u></p> <p><u>The Permittee shall file a public version of its public safety emergency response plan 14 days prior to its last plan and profile submittal.</u></p> <p><u>The Permittee shall conduct geotechnical evaluations prior to project construction to identify locations where potential groundwater impacts could occur. If shallow depths to groundwater resources are identified during geotechnical design of the project, the Permittee shall employ specialty structures with wider, shallower foundations. These locations shall be shown on the plan and profile submitted for the project, and appropriate mitigation measures be identified as part of the filing.</u></p> <p><u>The Permittee shall coordinate with the DNR to avoid adverse impacts to protected species and implement appropriate, species-specific BMPs if project activities take place during any of the species’ active seasons. Proof of this coordination shall be filed with the respective plan and profile submittal(s) for the Project.</u></p> <p><u>The Permittee shall utilize downward facing lighting on associated facilities. If LED lights are used, the Permittee shall follow MnDOT Approved Products for luminaries and a nominal color temperature below 2700K. If available, the Permittee shall choose products that have the lowest number for backlight and glare.</u></p> <p><u>The Permittee shall not use dust control products that contain chlorides to avoid the potential for chloride products accumulating to levels that are toxic to plants and wildlife.</u></p> <p><u>The Permittee shall file a decommissioning plan 14 days prior to the last pre-construction meeting for the Project.</u></p>

ID	ALJ Report Location	Sponsor	Recommended Modification to ALJ Report Language
			<u>The Permittee shall utilize wildlife friendly erosion and sediment control materials throughout the Project.</u>
E25	NEW Finding 676b	DOC EERA (699)	<u>The special permit conditions recommended by EERA staff are reasonable.</u>
E26	Conclusion 12	Xcel Energy	The record evidence demonstrates that the Applicant's Preferred Route, <u>with the inclusion of AA1 and the northernmost portion of Route Segment 223 as described in Finding 215</u> , satisfies the Route Permit criteria set forth in Minn. Stat. § 216E.03, subd. 7(a) and Minn. R. 7850.4100.
E27	Conclusion 13	Xcel Energy	The record evidence demonstrates that the Applicant's Preferred Route, <u>with the inclusion of AA1 and the northernmost portion of Route Segment 223 as described in Finding 215</u> , is consistent with the standards and criteria in Minn. Stat. § 216E.03, subd. 7 and Minn. R. 7850.4000.
E28	Conclusion 14	DOC EERA (12)	The record evidence demonstrates that the Applicant's Preferred Route <u>as modified by EERA staff</u> is the best route alternative for the Project.
E29	Conclusion 14	Xcel Energy	The record evidence demonstrates that the Applicant's Preferred Route, <u>with the inclusion of AA1 and the northernmost portion of Route Segment 223 as described in Finding 215</u> , is the best route alternative for the Project.
E30	Conclusion 15	DOC EERA (13)	The record evidence demonstrates that constructing the Project along the Applicant's Preferred Route <u>as modified by EERA staff</u> does not present a potential for significant and adverse environmental effects as those terms are used in the Minnesota Environmental Rights Act and the Minnesota Environmental Policy Act.
E31	Conclusion 15	Xcel Energy	The record evidence demonstrates that constructing the Project along the Applicant's Preferred Route, <u>with the inclusion of AA1 and the northernmost portion of Route Segment 223 as described in Finding 215</u> , does not present a potential for significant and adverse environmental effects as those terms are used in the Minnesota Environmental Rights Act and the Minnesota Environmental Policy Act.
E32	Recommendation	DOC EERA	Based upon these Findings of Fact and Conclusions of Law, the Administrative Law Judge recommends that the Commission issue a Certificate of Need and Route Permit for the Applicant's Preferred Route <u>as modified by EERA staff</u> to Xcel Energy to construct and operate the Project and associated facilities in Sherburne, Stearns, Kandiyohi, Wright, Meeker, Chippewa, Yellow Medicine, Renville, Redwood, and Lyon counties in Minnesota, and that the permit include the draft route permit conditions amended as set forth in the Conclusions above.
E33	Recommendation	Xcel Energy	Based upon these Findings of Fact and Conclusions of Law, the Administrative Law Judge recommends that the Commission issue a Certificate of Need and Route Permit for the Applicant's Preferred Route, <u>with the inclusion of AA1 and the northernmost portion of Route Segment 223 as described in Finding 215</u> , to Xcel Energy to construct and operate the Project and associated facilities in Sherburne, Stearns, Kandiyohi, Wright, Meeker, Chippewa,

ID	ALJ Report Location	Sponsor	Recommended Modification to ALJ Report Language
			Yellow Medicine, Renville, Redwood, and Lyon counties in Minnesota, and that the permit include the draft route permit conditions amended as set forth in the Conclusions above.

Attachment E

Draft Route Permit

STATE OF MINNESOTA PUBLIC UTILITIES COMMISSION

**ROUTE PERMIT FOR THE
MINNESOTA ENERGY CONNECTION PROJECT**

A HIGH-VOLTAGE TRANSMISSION LINE AND ASSOCIATED FACILITIES

IN

**SHERBURNE, STEARNS, KANDIYOHI, WRIGHT, MEEKER, CHIPPEWA, YELLOW MEDICINE,
RENVILLE, REDWOOD, AND LYON COUNTIES**

ISSUED TO

NORTHERN STATES POWER COMPANY D/B/A XCEL ENERGY

PUC DOCKET NO. E-002/TL-22-132

In accordance with the requirements of Minnesota Statutes Chapter 216E and Minnesota Rules Chapter 7850 this route permit is hereby issued to:

Northern States Power Company d/b/a Xcel Energy

Northern States Power Company d/b/a Xcel Energy (Permittee) is authorized by this route permit to construct and operate [Provide a description of the project authorized by the Minnesota Public Utilities Commission]. [Description will be updated according to the Commission's decision in this matter.]

The high-voltage transmission line and associated facilities shall be built within the route identified in this route permit and as portrayed on the route maps and in compliance with the conditions specified in this route permit.

Approved and adopted this ____ day of [Month, Year]

BY ORDER OF THE COMMISSION

Will Seuffert,
Executive Secretary

To request this document in another format such as large print or audio, call 651-296-0406 or 800-657-3782 (voice). Persons with a hearing or speech impairment may call using their preferred Telecommunications Relay Service or email consumer.puc@state.mn.us for assistance.

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ATTACHMENTS

Attachment 1 – Complaint Handling Procedures for Permitted Energy Facilities

Attachment 2 – Compliance Filing Procedures for Permitted Energy Facilities

Attachment 3 – Route Permit Maps [route maps are placeholders and will be updated according to the Commission’s decision in this matter.]

1 ROUTE PERMIT

The Minnesota Public Utilities Commission (Commission) hereby issues this route permit to Northern States Power Company d/b/a Xcel Energy (Permittee) pursuant to Minnesota Statutes Chapter 216E and Minnesota Rules Chapter 7850. This route permit authorizes the Permittee to construct and operate a [Provide a description of the project as authorized by the Commission] [Description will be updated according to the Commission's decision in this matter.], and as identified in the attached route maps, hereby incorporated into this document (Minnesota Energy Connection Project, henceforth known as Transmission Facility).

1.1 Pre-emption

Pursuant to Minn. Stat. § 216E.10, this route permit shall be the sole route approval required for construction of the transmission facilities and this route permit shall supersede and preempt all zoning, building, or land use rules, regulations, or ordinances promulgated by regional, county, local and special purpose governments.

2 TRANSMISSION FACILITY DESCRIPTION

[Provide a description of the Transmission Facility as authorized by the Commission]
[Description will be updated according to the Commission's decision in this matter.]

The Transmission Facility is located in the following:

County	Township Name	Township	Range	Section

2.1 Structures

[Provide a detailed description of the structures authorized by the Commission] [Description will be updated according to the Commission's decision in this matter.]

2.2 Conductors

[Provide a detailed description of the conductors authorized by the Commission] [Description will be updated according to the Commission's decision in this matter.]

The table below details specifics on the various structure and conductor types as presented in the route permit application.

Line Type	Conductor	Structure		Foundation	Height	Span
		Type	Material			

2.1 Substations and Associated Facilities

[Provide a detailed description of the associated facilities and substations as authorized by the Commission] [Description will be updated according to the Commission's decision in this matter.]

3 DESIGNATED ROUTE

The route designated by the Commission is described below and shown on the route maps attached to this route permit (Designated Route). The Designated Route is generally described as follows:

[The Designated Route will be updated according to the Commission's decision in this matter.]

The Designated Route includes an anticipated alignment and a right-of-way. The right-of-way is the physical land needed for the safe operation of the transmission line. The Permittee shall locate the alignment and associated right-of-way within the Designated Route unless otherwise authorized by this route permit or the Commission. The Designated Route provides the Permittee with flexibility for minor adjustments of the alignment and right-of-way to accommodate landowner requests and unforeseen conditions.

Any modifications to the Designated Route or modifications that would result in right-of-way placement outside the Designated Route shall be specifically reviewed by the Commission in accordance with Minn. R. 7850.4900 and Section 10 of this route permit.

4 RIGHT-OF-WAY

This route permit authorizes the Permittee to obtain a new permanent right-of-way for the transmission line up to [150] feet in width. The permanent right-of-way is typically [75] feet on both sides of the transmission line measured from its centerline or alignment.

The anticipated alignment is intended to minimize potential impacts relative to the criteria identified in Minn. R. 7850.4100. The final alignment must generally conform to the anticipated alignment identified on the route maps unless changes are requested by individual landowners and agreed to by the Permittee or for unforeseen conditions that are encountered or as otherwise provided for by this route permit.

Any right-of-way or alignment modifications within the Designated Route shall be located so as to have comparable overall impacts relative to the factors in Minn. R. 7850.4100, as does the right-of-way and alignment identified in this route permit, and shall be specifically identified and documented in and approved as part of the plan and profile submitted pursuant to Section 9.2 of this route permit.

Where the transmission line parallels existing highway and other road rights-of-way, the transmission line right-of-way shall occupy and utilize the existing right-of-way to the maximum extent possible; consistent with the criteria in Minn. R. 7850.4100, and the other requirements of this route permit; and for highways under the jurisdiction of the Minnesota Department of Transportation, the procedures for accommodating utilities in trunk highway rights-of-way.

5 GENERAL CONDITIONS

The Permittee shall comply with the following conditions during construction and operation of the Transmission Facility over the life of this route permit.

5.1 Route Permit Distribution

Within 30 days of issuance of this route permit, the Permittee shall provide all affected landowners with a copy of this route permit and the complaint procedures. An affected landowner is any landowner or designee that is within or adjacent to the Designated Route. In no case shall a landowner receive this route permit and complaint procedures less than five days prior to the start of construction on their property. The Permittee shall also provide a copy of this route permit and the complaint procedures to the applicable regional development commissions, county environmental offices, and city and township clerks. The Permittee shall file with the Commission an affidavit of its route permit and complaint procedures distribution within 30 days of issuance of this route permit.

5.2 Access to Property

The Permittee shall notify landowners prior to entering or conducting maintenance within their property, unless otherwise negotiated with the landowner. The Permittee shall keep records of compliance with this section and provide them upon the request of the Minnesota Department of Commerce (Commerce) or Commission staff.

5.3 Construction and Operation Practices

The Permittee shall comply with the construction practices, operation and maintenance practices, and material specifications described in the permitting record for this Transmission

Facility unless this route permit establishes a different requirement in which case this route permit shall prevail.

5.3.1 Field Representative

The Permittee shall designate a field representative responsible for overseeing compliance with the conditions of this route permit during construction of the Transmission Facility. This person shall be accessible by telephone or other means during normal business hours throughout site preparation, construction, cleanup, and restoration.

The Permittee shall file with the Commission the name, address, email, phone number, and emergency phone number of the field representative at least 14 days prior to the pre-construction meeting. The Permittee shall provide the field representative's contact information to affected landowners, local government units and other interested persons at least 14 days prior to the pre-construction meeting. The Permittee may change the field representative at any time upon notice to the Commission, affected landowners, local government units and other interested persons. The Permittee shall file with the Commission an affidavit of distribution of its field representative's contact information at least 14 days prior to the pre-construction meeting and upon changes to the field representative.

5.3.2 Employee Training - Route Permit Terms and Conditions

The Permittee shall train all employees, contractors, and other persons involved in the Transmission Facility construction regarding the terms and conditions of this route permit. The Permittee shall keep records of compliance with this section and provide them upon the request of Commerce or Commission staff.

5.3.3 Independent Third-Party Monitoring

Prior to any construction, the Permittee shall propose a scope of work and identify an independent third-party monitor to conduct Project construction monitoring on behalf of the Department of Commerce. The scope of work shall be developed in consultation with and approved by the Department of Commerce. This third-party monitor will report directly to and will be under the control of the Department of Commerce with costs borne by the Permittee. Commerce staff shall keep records of compliance with this section and will ensure that status reports detailing the construction monitoring are filed with the Commission in accordance with scope of work approved by the Department of Commerce.

5.3.4 Public Services, Public Utilities, and Existing Easements

During Transmission Facility construction, the Permittee shall minimize any disruption to public services or public utilities. To the extent disruptions to public services or public utilities occur these shall be temporary, and the Permittee shall restore service promptly. Where any impacts to utilities have the potential to occur the Permittee will work with both landowners and local entities to determine the most appropriate mitigation measures if not already considered as part of this route permit.

The Permittee shall cooperate with county and city road authorities to develop appropriate signage and traffic management during construction. The Permittee shall keep records of compliance with this section and provide them upon the request of Commerce or Commission staff.

5.3.5 Temporary Workspace

The Permittee shall limit temporary easements to special construction access needs and additional staging or lay-down areas required outside of the authorized right-of-way. Temporary space shall be selected to limit the removal and impacts to vegetation. The Permittee shall obtain temporary easements outside of the authorized transmission line right-of-way from affected landowners through rental agreements. Temporary easements are not provided for in this route permit.

The Permittee may construct temporary driveways between the roadway and the structures to minimize impact using the shortest route feasible. The Permittee shall use construction mats to minimize impacts on access paths and construction areas. The Permittee shall submit the location of temporary workspaces and driveways with the plan and profile pursuant to Section 9.2.

5.3.6 Noise

The Permittee shall comply with noise standards established under Minn. R. 7030.0010 to 7030.0080. The Permittee shall limit construction and maintenance activities to daytime working hours to the extent practicable.

5.3.7 Aesthetics

The Permittee shall consider input pertaining to visual impacts from landowners or land management agencies prior to final location of structures, rights-of-way, and other areas with the potential for visual disturbance. The Permittee shall use care to preserve the natural landscape, minimize tree removal and prevent any unnecessary destruction of the natural surroundings in the vicinity of the Transmission Facility during construction and maintenance. The Permittee shall work with landowners to locate the high-voltage transmission line to

minimize the loss of agricultural land, forest, and wetlands, and to avoid homes and farmsteads. The Permittee shall place structures at a distance, consistent with sound engineering principles and system reliability criteria, from intersecting roads, highways, or trail crossings.

5.3.8 Soil Erosion and Sediment Control

The Permittee shall implement those erosion prevention and sediment control practices recommended by the Minnesota Pollution Control Agency Construction Stormwater Program. If construction of the Transmission Facility disturbs more than one acre of land or is sited in an area designated by the Minnesota Pollution Control Agency as having potential for impacts to water resources, the Permittee shall obtain a National Pollutant Discharge Elimination System/State Disposal System Construction Stormwater Permit from the Minnesota Pollution Control Agency that provides for the development of a Stormwater Pollution Prevention Plan that describes methods to control erosion and runoff.

The Permittee shall implement reasonable measures to minimize erosion and sedimentation during construction and shall employ perimeter sediment controls, protect exposed soil by promptly planting, seeding, using erosion control blankets and turf reinforcement mats, stabilizing slopes, protecting storm drain inlets, protecting soil stockpiles, and controlling vehicle tracking. Contours shall be graded as required so that all surfaces provide for proper drainage, blend with the natural terrain, and are left in a condition that will facilitate re-vegetation and prevent erosion. All areas disturbed during construction of the Transmission Facility shall be returned to pre-construction conditions.

5.3.9 Wetlands and Water Resources

The Permittee shall develop wetland impact avoidance measures and implement them during construction of the Transmission Facility. Measures shall include spacing and placing the power poles at variable distances to span and avoid wetlands, watercourses, and floodplains. Unavoidable wetland impacts as a result of the placement of poles shall be limited to the immediate area around the poles. To minimize impacts, the Permittee shall construct in wetland areas during frozen ground conditions where practicable and according to permit requirements by the applicable permitting authority. When construction during winter is not possible, the Permittee shall use wooden or composite mats to protect wetland vegetation.

The Permittee shall contain soil excavated from the wetlands and riparian areas and not place it back into the wetland or riparian area. The Permittee shall access wetlands and riparian areas using the shortest route feasible in order to minimize travel through wetland areas and prevent unnecessary impacts. The Permittee shall not place staging or stringing set up areas within or

adjacent to wetlands or water resources, as practicable. The Permittee shall assemble power pole structures on upland areas before they are brought to the site for installation.

The Permittee shall restore wetland and water resource areas disturbed by construction activities to pre-construction conditions in accordance with the requirements of applicable state and federal permits or laws and landowner agreements.

The Permittee shall meet all requirements of the U.S. Army Corps of Engineers, Minnesota Department of Natural Resources, and local units of government.

5.3.10 Vegetation Management

The Permittee shall minimize the number of trees to be removed in selecting the right-of-way specifically preserving to the maximum extent practicable windbreaks, shelterbelts, living snow fences, and vegetation in areas such as trail and stream crossings where vegetative screening may minimize aesthetic impacts, to the extent that such actions do not violate sound engineering principles or system reliability criteria.

The Permittee shall remove tall growing species located within the transmission line right-of-way that endanger the safe and reliable operation of the transmission line. The Permittee shall leave undisturbed, to the extent possible, existing low growing species in the right-of-way or replant such species in the right-of-way to blend the difference between the right-of-way and adjacent areas, to the extent that the low growing vegetation that will not pose a threat to the transmission line or impede construction.

5.3.11 Application of Pesticides

The Permittee shall restrict pesticide use to those pesticides and methods of application approved by the Minnesota Department of Agriculture, Minnesota Department of Natural Resources, and the U.S. Environmental Protection Agency. Selective foliage or basal application shall be used when practicable. All pesticides shall be applied in a safe and cautious manner so as not to damage adjacent properties including crops, orchards, tree farms, apiaries, or gardens. The Permittee shall contact the landowner at least 14 days prior to pesticide application on their property. The Permittee may not apply any pesticide if the landowner requests that there be no application of pesticides within the landowner's property. The Permittee shall provide notice of pesticide application to landowners and beekeepers operating apiaries within three miles of the pesticide application area at least 14 days prior to such application. The Permittee shall keep pesticide communication and application records and provide them upon the request of Commerce or Commission staff.

5.3.12 Invasive Species

The Permittee shall employ best management practices to avoid the potential introduction and spread of invasive species on lands disturbed by Transmission Facility construction activities. The Permittee shall develop an Invasive Species Prevention Plan and file it with the Commission at least 14 days prior to the pre-construction meeting. The Permittee shall comply with the most recently filed Invasive Species Prevention Plan.

5.3.13 Noxious Weeds

The Permittee shall take all reasonable precautions against the spread of noxious weeds during all phases of construction. When utilizing seed to establish temporary and permanent vegetative cover on exposed soil the Permittee shall select site appropriate seed certified to be free of noxious weeds. To the extent possible, the Permittee shall use native seed mixes. The Permittee shall keep records of compliance with this section and provide them upon the request of Commerce or Commission staff.

5.3.14 Roads

The Permittee shall advise the appropriate governing bodies having jurisdiction over all state, county, city, or township roads that will be used during the construction phase of the Transmission Facility. Where practical, existing roadways shall be used for all activities associated with construction of the Transmission Facility. Oversize or overweight loads associated with the Transmission Facility shall not be hauled across public roads without required permits and approvals.

The Permittee shall construct the fewest number of site access roads required. Access roads shall not be constructed across streams and drainage ways without the required permits and approvals. Access roads shall be constructed in accordance with all necessary township, county or state road requirements and permits.

The Permittee shall promptly repair private roads or lanes damaged when moving equipment or when accessing construction workspace, unless otherwise negotiated with the affected landowner.

5.3.15 Archaeological and Historic Resources

The Permittee shall make every effort to avoid impacts to archaeological and historic resources when constructing the Transmission Facility. In the event that a resource is encountered, the Permittee shall consult with the State Historic Preservation Office and the State Archaeologist. Where feasible, avoidance of the resource is required. Where not feasible, mitigation must

include an effort to minimize Transmission Facility impacts on the resource consistent with State Historic Preservation Office and State Archaeologist requirements.

Prior to construction, the Permittee shall train workers about the need to avoid cultural properties, how to identify cultural properties, and procedures to follow if undocumented cultural properties, including gravesites, are found during construction. If human remains are encountered during construction, the Permittee shall immediately halt construction and promptly notify local law enforcement and the State Archaeologist. The Permittee shall not resume construction at such location until authorized by local law enforcement or the State Archaeologist. The Permittee shall keep records of compliance with this section and provide them upon the request of Commerce or Commission staff.

5.3.16 Avian Protection

The Permittee in cooperation with the Minnesota Department of Natural Resources 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 wingspans that may simultaneously come in contact with a conductor and grounding devices. The Permittee shall submit documentation of its avian protection coordination with the plan and profile pursuant to Section 9.2.

5.3.17 Restoration

The Permittee shall restore the right-of-way, temporary workspaces, access roads, abandoned right-of-way, and other public or private lands affected by construction of the Transmission Facility. Restoration within the right-of-way must be compatible with the safe operation, maintenance, and inspection of the transmission line. Within 60 days after completion of all restoration activities, the Permittee shall file with the Commission a Notification of Restoration Completion.

5.3.18 Cleanup

The Permittee shall remove and properly dispose of all waste and scrap from the right-of-way and all premises on which construction activities were conducted upon completion of each task. The Permittee shall remove and properly dispose of all personal litter, including bottles, cans, and paper from construction activities on a daily basis.

5.3.19 Pollution and Hazardous Wastes

The Permittee shall take all appropriate precautions to protect against pollution of the environment. The Permittee shall be responsible for compliance with all laws applicable to the generation, storage, transportation, clean up and disposal of all wastes generated during construction and restoration of the right-of-way.

5.3.20 Damages

The Permittee shall fairly restore or compensate landowners for damage to crops, fences, private roads and lanes, landscaping, drain tile, or other damages sustained during construction. The Permittee shall keep records of compliance with this section and provide them upon the request of Commerce or Commission staff.

5.4 Electrical Performance Standards

5.4.1 Grounding

The Permittee shall design, construct, and operate the transmission line in a manner so that the maximum induced steady-state short-circuit current shall be limited to five milliamperes root mean square (rms) alternating current between the ground and any non-stationary object within the right-of-way, including but not limited to large motor vehicles and agricultural equipment. All fixed metallic objects on or off the right-of-way, except electric fences that parallel or cross the right-of-way, shall be grounded to the extent necessary to limit the induced short-circuit current between ground and the object so as not to exceed one milliamperes rms under steady state conditions of the transmission line and to comply with the ground fault conditions specified in the National Electric Safety Code. The Permittee shall address and rectify any induced current problems that arise during transmission line operation.

5.4.2 Electric Field

The Permittee shall design, construct, and operate the transmission line in such a manner that the electric field measured one meter above ground level immediately below the transmission line shall not exceed 8.0 kV/m rms.

5.4.3 Interference with Communication Devices

If interference with radio or television, satellite, wireless internet, GPS-based agriculture navigation systems or other communication devices is caused by the presence or operation of the Transmission Facility, the Permittee shall take whatever action is necessary to restore or provide reception equivalent to reception levels in the immediate area just prior to the construction of the Transmission Facility. The Permittee shall keep records of compliance with this section and provide them upon the request of Commerce or Commission staff.

5.5 Other Requirements

5.5.1 Safety Codes and Design Requirements

The Permittee shall design the transmission line and associated facilities to meet or exceed all relevant local and state codes, the National Electric Safety Code, and North American Electric Reliability Corporation requirements. This includes standards relating to clearances to ground, clearance to crossing utilities, clearance to buildings, strength of materials, clearances over roadways, right-of-way widths, and permit requirements.

5.5.2 Other Permits and Regulations

The Permittee shall comply with all applicable state rules and statutes. The Permittee shall obtain all required permits for the Transmission Facility and comply with the conditions of those permits unless those permits conflict with or are preempted by federal or state permits and regulations. The Permittee shall submit a copy of such permits upon the request of Commerce or Commission staff.

At least 14 days prior to the pre-construction meeting, the Permittee shall file with the Commission an Other Permits and Regulations Submittal that contains a detailed status of all permits, authorizations, and approvals that have been applied for specific to the Transmission Facility. The Other Permits and Regulations Submittal shall also include the permitting agency or authority, the name of the permit, authorization, or approval being sought, contact person and contact information for the permitting agency or authority, brief description of why the permit, authorization, or approval is needed, application submittal date, and the date the permit, authorization, or approval was issued or is anticipated to be issued.

6 SPECIAL CONDITIONS

The special conditions shall take precedence over other conditions of this permit should there be a conflict.

[Section may be updated according to the Commission's decision in this matter.]

7 DELAY IN CONSTRUCTION

If the Permittee has not commenced construction or improvement of the route within four years after the date of issuance of this route permit the Permittee shall file a Failure to Construct Report and the Commission shall consider suspension of this route permit in accordance with Minn. R. 7850.4700.

8 COMPLAINT PROCEDURES

At least 14 days prior to the pre-construction meeting, the Permittee shall file with the Commission the complaint procedures that will be used to receive and respond to complaints. The complaint procedures shall be in accordance with the requirements of Minn. R. 7829.1500 or Minn. R. 7829.1700, and as set forth in the complaint procedures attached to this route permit.

Upon request, the Permittee shall assist Commerce or Commission staff with the disposition of unresolved or longstanding complaints. This assistance shall include, but is not limited to, the submittal of complaint correspondence and complaint resolution efforts.

9 COMPLIANCE REQUIREMENTS

Failure to timely and properly make compliance filings required by this route permit is a failure to comply with the conditions of this route permit. Compliance filings must be electronically filed with the Commission.

9.1 Pre-Construction Meeting

Prior to the start of construction, the Permittee shall participate in a pre-construction meeting with Commerce and Commission staff to review pre-construction filing requirements, scheduling, and to coordinate monitoring of construction and site restoration activities. Within 14 days following the pre-construction meeting, the Permittee shall file with the Commission a summary of the topics reviewed and discussed and a list of attendees. The Permittee shall indicate in the filing the anticipated construction start date.

9.2 Plan and Profile

At least 14 days prior to the pre-construction meeting, the Permittee shall file with the Commission, and provide the Department of Commerce, and the counties where the Transmission Facility, or portion of the Transmission Facility, will be constructed with a plan and profile of the right-of-way and the specifications and drawings for right-of-way preparation, construction, structure specifications and locations, cleanup, and restoration for the Transmission Facility. The documentation shall include maps depicting the plan and profile including the right-of-way, alignment, and structures in relation to the route and alignment approved per this route permit.

The Permittee may not commence construction until the earlier of (i) 30 days after the pre-construction meeting or (ii) or until the Commission staff has notified the Permittee in writing

that it has completed its review of the documents and determined that the planned construction is consistent with this route permit.

If the Commission notifies the Permittee in writing within 30 days after the pre-construction meeting that it has completed its review of the documents and planned construction, and finds that the planned construction is not consistent with this route permit, the Permittee may submit additional and/or revised documentation and may not commence construction until the Commission has notified the Permittee in writing that it has determined that the planned construction is consistent with this route permit.

If the Permittee intends to make any significant changes in its plan and profile or the specifications and drawings after submission to the Commission, the Permittee shall notify the Commission, the Department of Commerce, and county staff at least five days before implementing the changes. No changes shall be made that would be in violation of any of the terms of this route permit.

9.3 Status Reports

The Permittee shall file with the Commission monthly Construction Status Reports beginning with the pre-construction meeting and until completion of restoration. Construction Status Reports shall describe construction activities and progress, activities undertaken in compliance with this route permit, and shall include text and photographs.

If the Permittee does not commence construction of the Transmission Facility within six months of this route permit issuance, the Permittee shall file with the Commission Pre-Construction Status Reports on the anticipated timing of construction every six months beginning with the issuance of this route permit until the pre-construction meeting.

9.4 In-Service Date

At least three days before the Transmission Facility is to be placed into service, the Permittee shall notify the Commission of the date on which the Transmission Facility will be placed into service and the date on which construction was completed.

9.5 As-Builts

Within 90 days after completion of construction, the Permittee shall submit to the Commission copies of all final as-built plans and specifications developed during the Transmission Facility construction.

9.6 GPS Data

Within 90 days after completion of construction, the Permittee shall submit to the Commission, in the format requested by the Commission, geo-spatial information (e.g., ArcGIS compatible map files, GPS coordinates, associated database of characteristics) for all structures associated with the Transmission Facility and each substation connected.

9.7 Right of Entry

The Permittee shall allow Commission designated representatives to perform the following, upon reasonable notice, upon presentation of credentials and at all times in compliance with the Permittee's site safety standards:

- (a) To enter upon the facilities easement of the property for the purpose of obtaining information, examining records, and conducting surveys or investigations.
- (b) To bring such equipment upon the facilities easement of the property as is necessary to conduct such surveys and investigations.
- (c) To sample and monitor upon the facilities easement of the property.
To examine and copy any documents pertaining to compliance with the conditions of this route permit.

10 ROUTE PERMIT AMENDMENT

This route permit may be amended at any time by the Commission. Any person may request an amendment of the conditions of this route permit by submitting a request to the Commission in writing describing the amendment sought and the reasons for the amendment. The Commission will mail notice of receipt of the request to the Permittee. The Commission may amend the conditions after affording the Permittee and interested persons such process as is required under Minn. R. 7850.4900.

11 TRANSFER OF ROUTE PERMIT

The Permittee may request at any time that the Commission transfer this route permit to another person or entity (transferee). In its request, the Permittee must provide the Commission with:

- (a) the name and description of the transferee;
- (b) the reasons for the transfer;
- (c) a description of the facilities affected; and
- (d) the proposed effective date of the transfer.

The transferee must provide the Commission with a certification that it has read, understands and is able to comply with the plans and procedures filed for the Transmission Facility and all conditions of this route permit. The Commission may authorize transfer of the route permit after affording the Permittee, the transferee, and interested persons such process as is required under Minn. R. 7850.5000.

12 REVOCATION OR SUSPENSION OF ROUTE PERMIT

The Commission may initiate action to revoke or suspend this route permit at any time. The Commission shall act in accordance with the requirements of Minn. R. 7850.5100, to revoke or suspend this route permit.

ATTACHMENT 1

Complaint Handling Procedures for Permitted Energy Facilities

DRAFT PERMIT

**MINNESOTA PUBLIC UTILITIES COMMISSION
COMPLAINT HANDLING PROCEDURES FOR
PERMITTED ENERGY FACILITIES**

A. Purpose

To establish a uniform and timely method of reporting and resolving complaints received by the permittee concerning permit conditions for site or route preparation, construction, cleanup, restoration, operation, and maintenance.

B. Scope

This document describes complaint reporting procedures and frequency.

C. Applicability

The procedures shall be used for all complaints received by the permittee and all complaints received by the Minnesota Public Utilities Commission (Commission) under Minn. R. 7829.1500 or Minn. R. 7829.1700 relevant to this permit.

D. Definitions

Complaint: A verbal or written statement presented to the permittee by a person expressing dissatisfaction or concern regarding site or route preparation, cleanup or restoration, or other permit conditions. Complaints do not include requests, inquiries, questions or general comments.

Substantial Complaint: A written complaint alleging a violation of a specific permit condition that, if substantiated, could result in permit modification or suspension pursuant to the applicable regulations.

Unresolved Complaint: A complaint which, despite the good faith efforts of the permittee and a person, remains unresolved or unsatisfactorily resolved to one or both of the parties.

Person: An individual, partnership, joint venture, private or public corporation, association, firm, public service company, cooperative, political subdivision, municipal corporation, government agency, public utility district, or any other entity, public or private; however organized.

E. Complaint Documentation and Processing

1. The permittee shall designate a representative responsible for filing complaints to the Commission's eDocket system. This person's name, phone number and email address shall accompany all complaint submittals. The name and contact information for the representative shall be kept current in eDockets.
2. A person presenting the complaint should, to the extent possible, include the following information in their communications:
 - a. name, address, phone number, and email address;
 - b. initial date of the complaint;
 - c. tract, parcel number, or address of the complaint;
 - d. a summary of the complaint; and
 - e. whether the complaint relates to a permit violation, a construction practice issue, or other type of complaint.
3. The permittee shall document all complaints by maintaining a record of all applicable information concerning the complaint, including the following:
 - a. docket number and project name;
 - b. name of complainant, address, phone number and email address;
 - c. precise description of property or parcel number;
 - d. name of permittee representative receiving complaint and date of receipt;
 - e. nature of complaint and the applicable permit condition(s);
 - f. summary of activities undertaken to resolve the complaint; and
 - g. a statement on the final disposition of the complaint.

F. Reporting Requirements

The permittee shall commence complaint reporting at the beginning of project construction and continue through the term of the permit, unless otherwise required below. The permittee shall report all complaints to the Commission according to the following schedule:

Immediate Reports: All substantial complaints shall be reported to the Commission the same day received, or on the following working day for complaints received after working hours. Such reports are to be directed to the Commission's Public Advisor at 1-800-657-3782 (voice messages are acceptable) or publicadvisor.puc@state.mn.us. For e-mail reporting, the email

subject line should read “PUC EFP Complaint” and include the appropriate project docket number.

Monthly Reports: During project construction, restoration, and operation, a summary of all complaints, including substantial complaints received or resolved during the preceding month, shall be filed by the 15th of each month to Will Seuffert, Executive Secretary, Public Utilities Commission, using the eDockets system. The eDockets system is located at: <https://www.edockets.state.mn.us/EFiling/home.jsp>. If no complaints were received during the preceding month, the permittee shall file a summary indicating that no complaints were received.

If a project has submitted twelve consecutive months of complaint reports with no complaints, monthly reports can terminate by a letter to eDockets notifying the Commission of such action. If a substantial complaint is received (by the company or the Commission) following termination of the monthly complaint report, as noted above, the monthly reporting should commence for a period of six months following the most recent complaint or upon resolution of all pending complaints.

If a permittee is found to be in violation of this section, the Commission may reinstate monthly complaint reporting for the remaining permit term or enact some other commensurate requirement via notification by the Executive Secretary or some other action as decided by the Commission.

G. Complaints Received by the Commission

Complaints received directly by the Commission from aggrieved persons regarding the permit or issues related to site or route preparation, construction, cleanup, restoration, or operation and maintenance will be promptly sent to the permittee.

The permittee shall notify the Commission when the issue has been resolved. The permittee will add the complaint to the monthly reports of all complaints. If the permittee is unable to find resolution, the Commission will use the process outlined in the Unresolved Complaints Section to process the issue.

H. Commission Process for Unresolved Complaints

Complaints raising substantial and unresolved permit issues will be investigated by the Commission. Staff will notify the permittee and appropriate people if it determines that the

complaint is a substantial complaint. With respect to such complaints, the permittee and complainant shall be required to submit a written summary of the complaint and its current position on the issues to the Commission. Staff will set a deadline for comments. As necessary, the complaint will be presented to the Commission for consideration.

I. Permittee Contacts for Complaints and Complaint Reporting

Complaints may be filed by mail or email to the permittee's designated complaint representative, or to the Commission's Public Advisor at 1-800-657-3782 or publicadvisor.puc@state.mn.us. The name and contact information for the permittee's designated complaint representative shall be kept current in the Commission's eDocket system.

ATTACHMENT 2

Compliance Filing Procedures for Permitted Energy Facilities

DRAFT PERMIT

**MINNESOTA PUBLIC UTILITIES COMMISSION
COMPLIANCE FILING PROCEDURE FOR
PERMITTED ENERGY FACILITIES**

A. Purpose

To establish a uniform and timely method of submitting information required by Commission energy facility permits.

B. Scope and Applicability

This procedure encompasses all known compliance filings required by permit.

C. Definitions

Compliance Filing: A filing of information to the Commission, where the information is required by a Commission site or route permit.

D. Responsibilities

1. The permittee shall file all compliance filings with Will Seuffert, Executive Secretary, Public Utilities Commission, through the eDockets system. The eDockets system is located at:
<https://www.edockets.state.mn.us/EFiling/home.jsp>

General instructions are provided on the eDockets website. Permittees must register on the website to file documents.

2. All filings must have a cover sheet that includes:
 - a. Date
 - b. Name of submitter/permittee
 - c. Type of permit (site or route)
 - d. Project location
 - e. Project docket number
 - f. Permit section under which the filing is made
 - g. Short description of the filing

3. Filings that are graphic intensive (e.g., maps, engineered drawings) must, in addition to being electronically filed, be submitted as paper copies and on CD. Paper copies and CDs should be sent to: 1) Will Seuffert, Executive Secretary, Minnesota Public Utilities Commission, 121 7th Place East, Suite 350, St. Paul, MN 55101-2147, and 2) Department of Commerce, Energy Environmental Review and Analysis, 85 7th Place East, Suite 500, St. Paul, MN 55101-2198.

The Commission may request a paper copy of any electronically filed document.

DRAFT PERMIT

PERMIT COMPLIANCE FILINGS¹

PERMITTEE:

PERMIT TYPE:

PROJECT LOCATION:

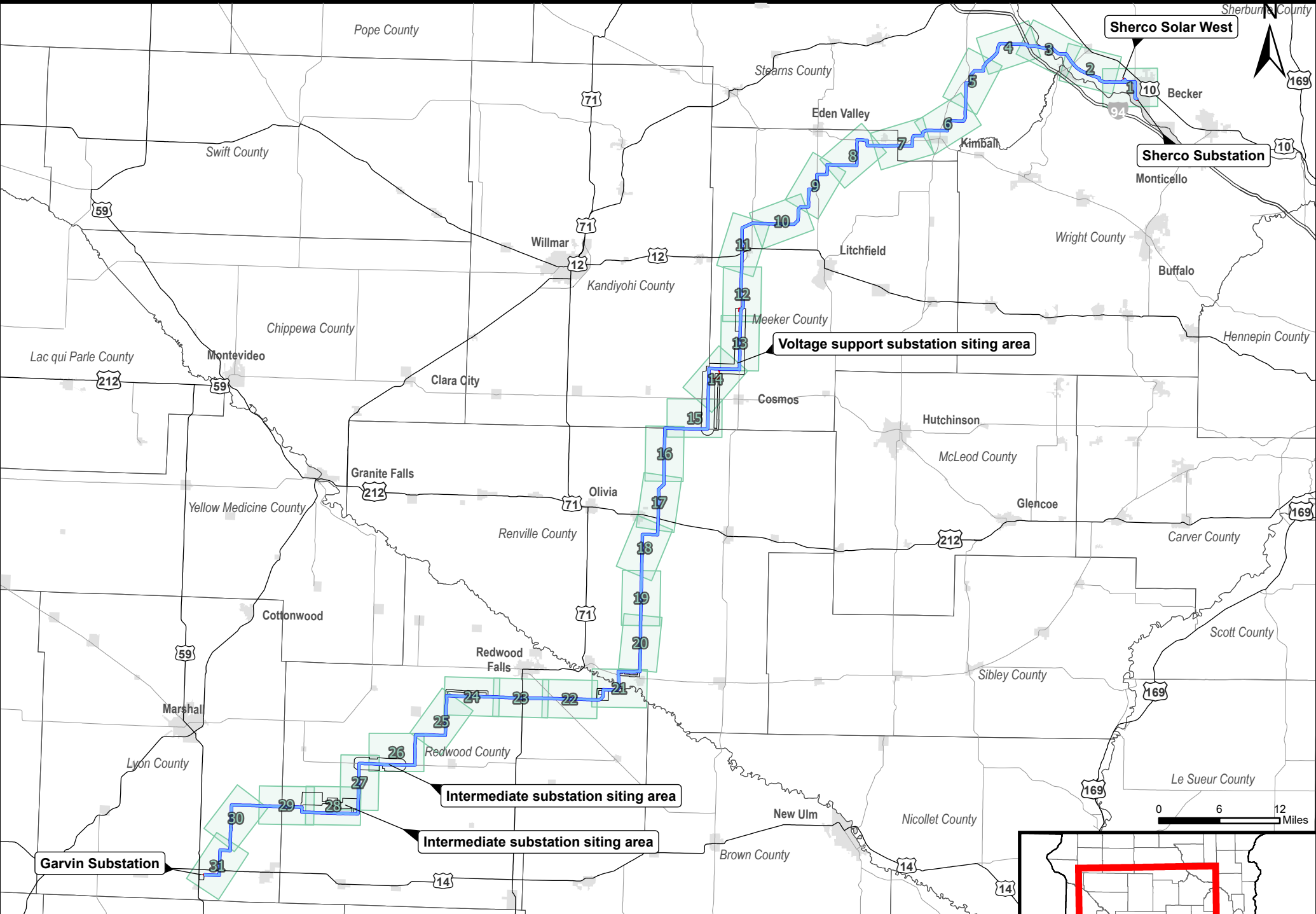
PUC DOCKET NUMBER:

Filing Number	Permit Section	Description of Compliance Filing	Due Date

¹ This compilation of permit compliance filings is provided for the convenience of the permittee and the Commission. It is not a substitute for the permit; the language of the permit controls.

ATTACHMENT 3
Route Permit Maps

[route maps are placeholders and will be updated according to the Commission's decision in this matter.]



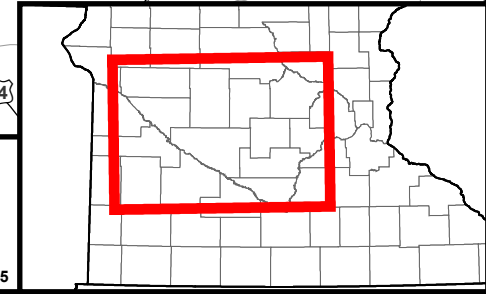
Minnesota Energy Connection

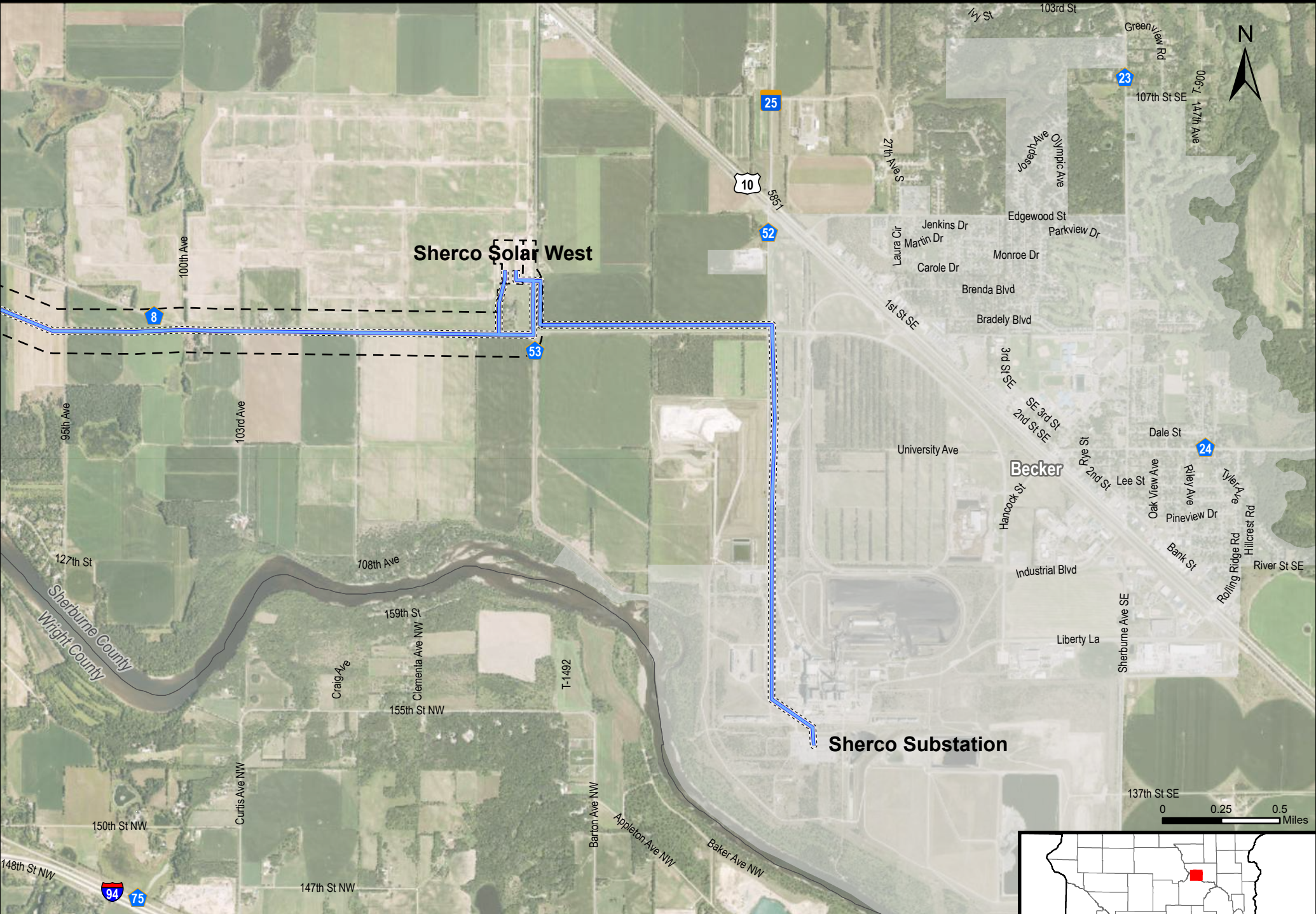
Route Overview Map

- Xcel Energy's Preferred Route
- ALJ Recommended Route
- Route Width
- Municipality
- County Boundaries
- Route Map Page Number

DISCLAIMER: This information is believed to be correct but is subject to change and is not warranted.

Date: 3/28/2025





Minnesota Energy Connection

Route Maps | Sherburne County

- Xcel Energy's Preferred Route
- Route Alternatives
- Right-of-Way (150')
- Route Width
- Municipality
- County Boundary

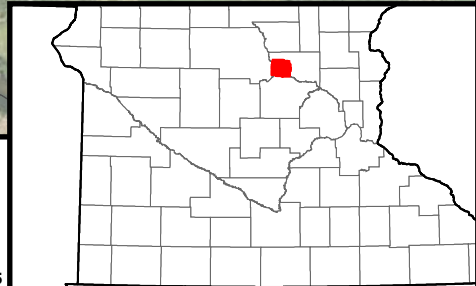
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Minnesota Energy Connection

Route Maps | Sherburne County

- Xcel Energy's Preferred Route
- Route Alternatives
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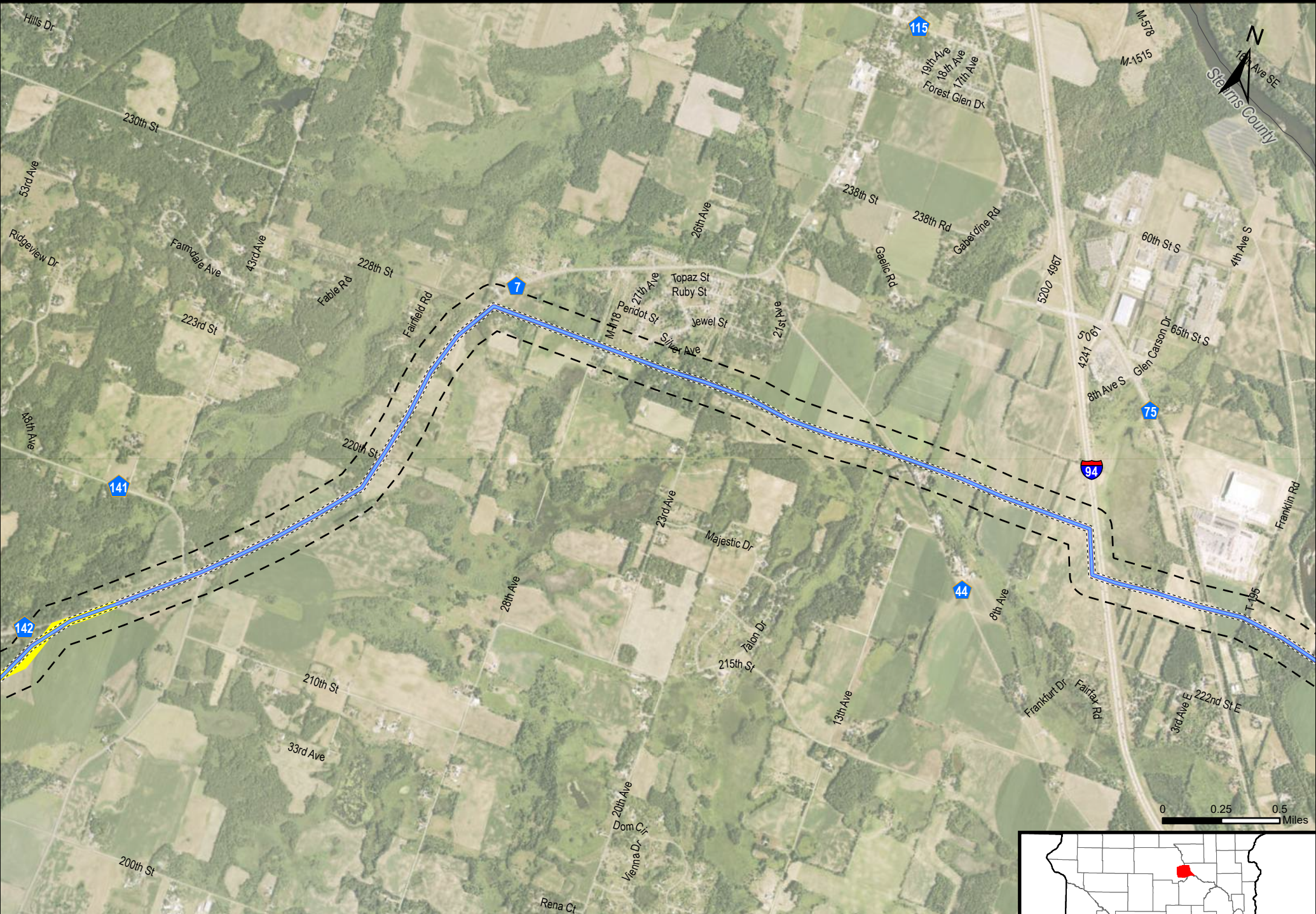


Minnesota Energy Connection

Route Maps | Sherburne and Stearns County

- Xcel Energy's Preferred Route
- Route Alternatives
- Right-of-Way (150')
- Route Width
- Municipality
- County Boundary

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Minnesota Energy Connection







Route Maps | Stearns County

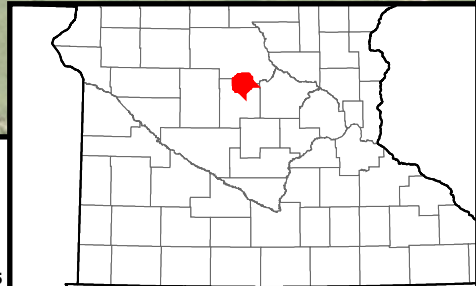
- Xcel Energy's Preferred Route
- Route Alternatives
- Right-of-Way (150')
- Route Width
- Municipality
- County Boundary

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Minnesota Energy Connection
Route Maps | Meeker County

-  Xcel Energy's Preferred Route
-  Route Alternatives
-  Right-of-Way (150')
-  Route Width
-  Municipality
-  County Boundary



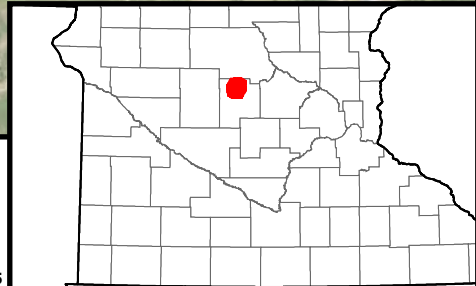
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Minnesota Energy Connection
Route Maps | Meeker County







- Xcel Energy's Preferred Route
- Route Alternatives
- Right-of-Way (150')
- Route Width
- Municipality
- County Boundary

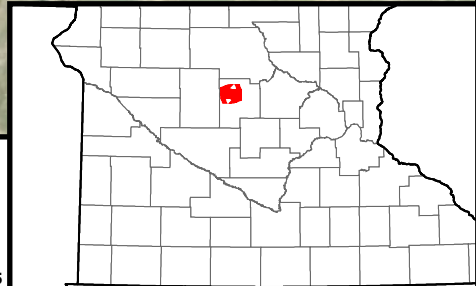
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Minnesota Energy Connection
Route Maps | Meeker County

-  Xcel Energy's Preferred Route
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





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Minnesota Energy Connection

Route Maps | Meeker County

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-  Route Width
-  Municipality
-  County Boundary

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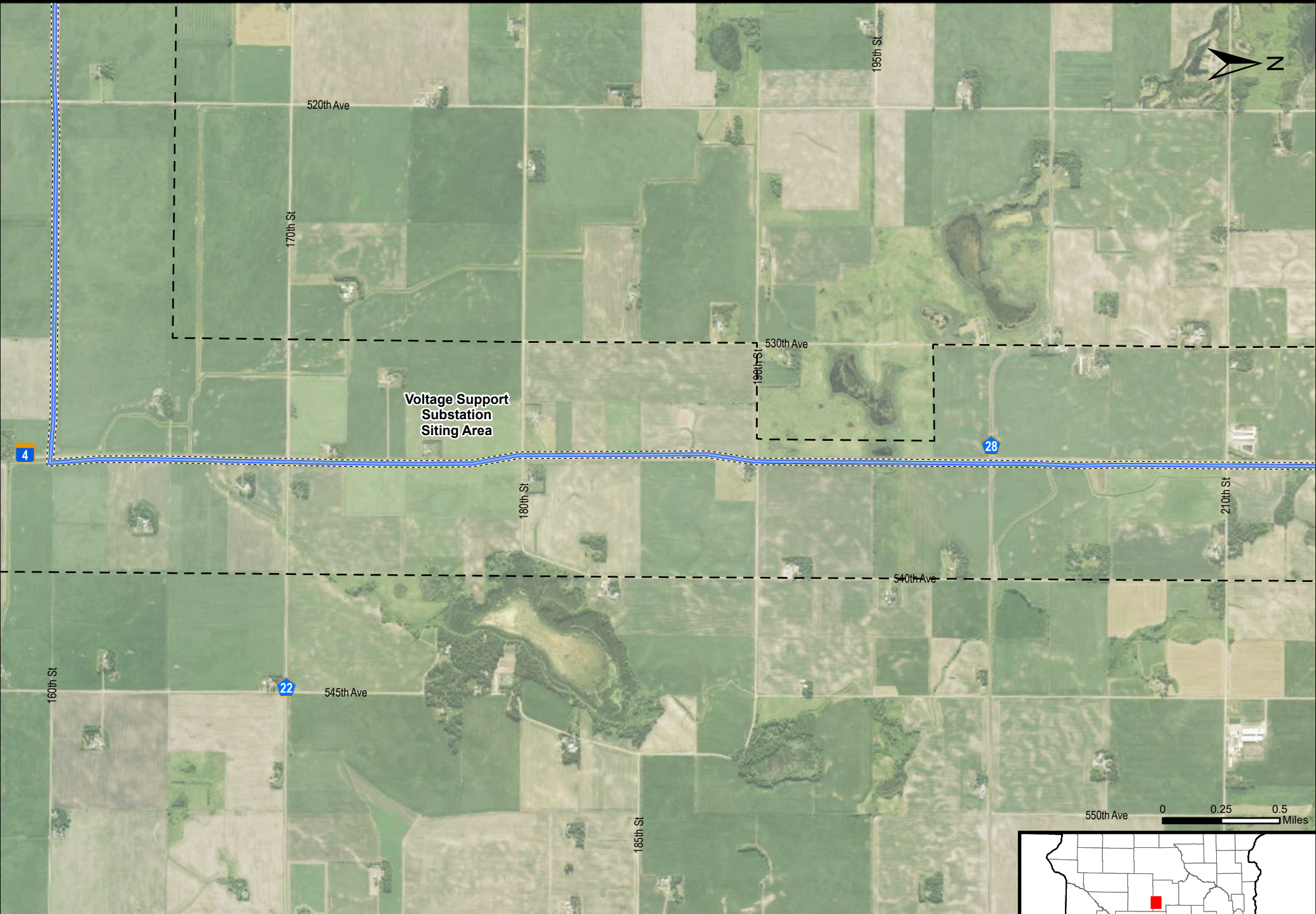
Minnesota Energy Connection

Route Maps | Meeker County

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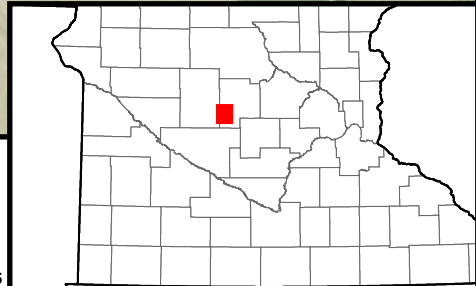
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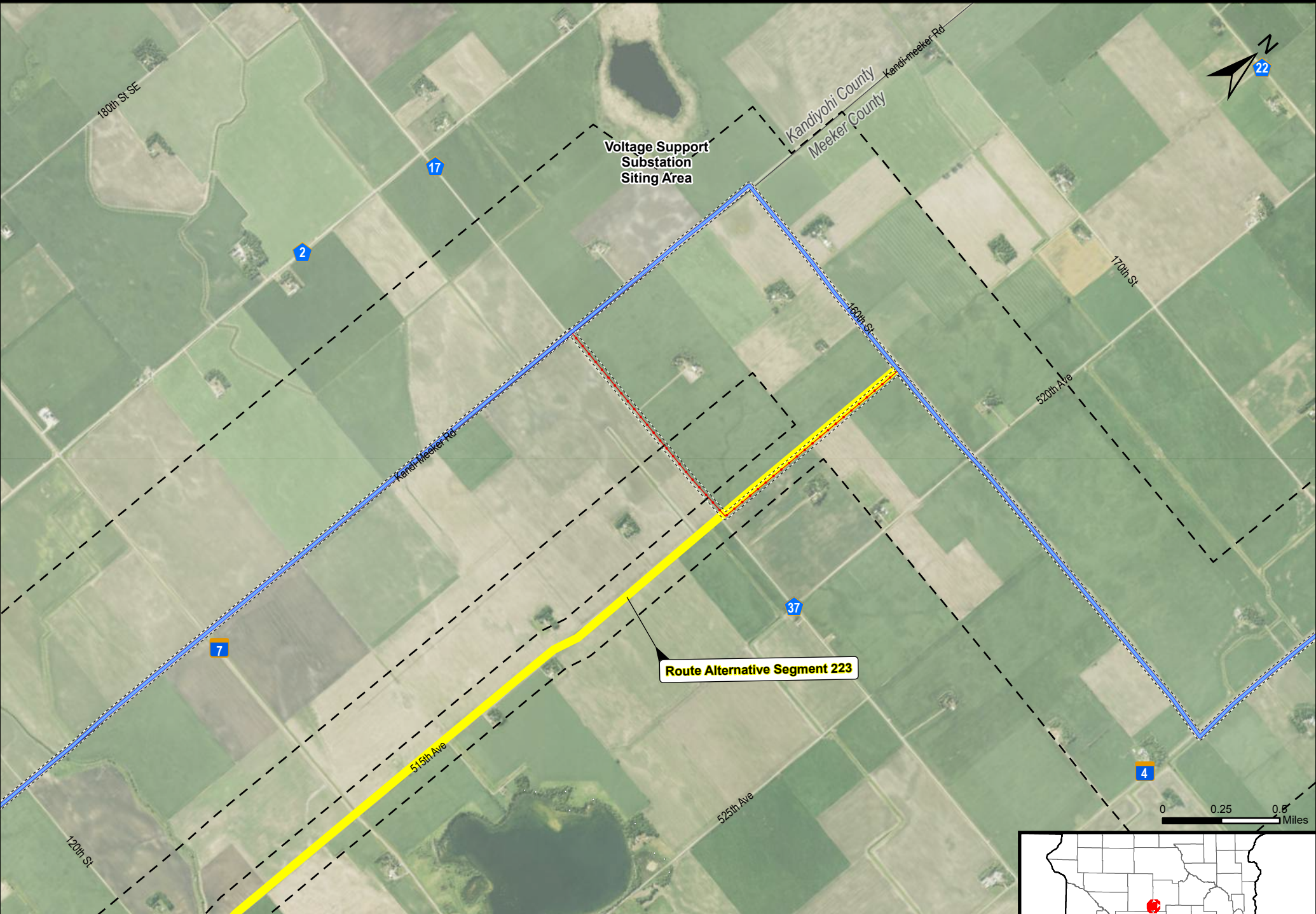
Minnesota Energy Connection
Route Maps | Meeker County

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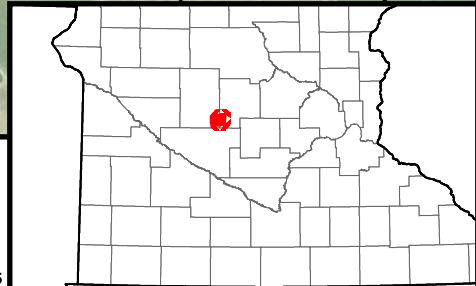
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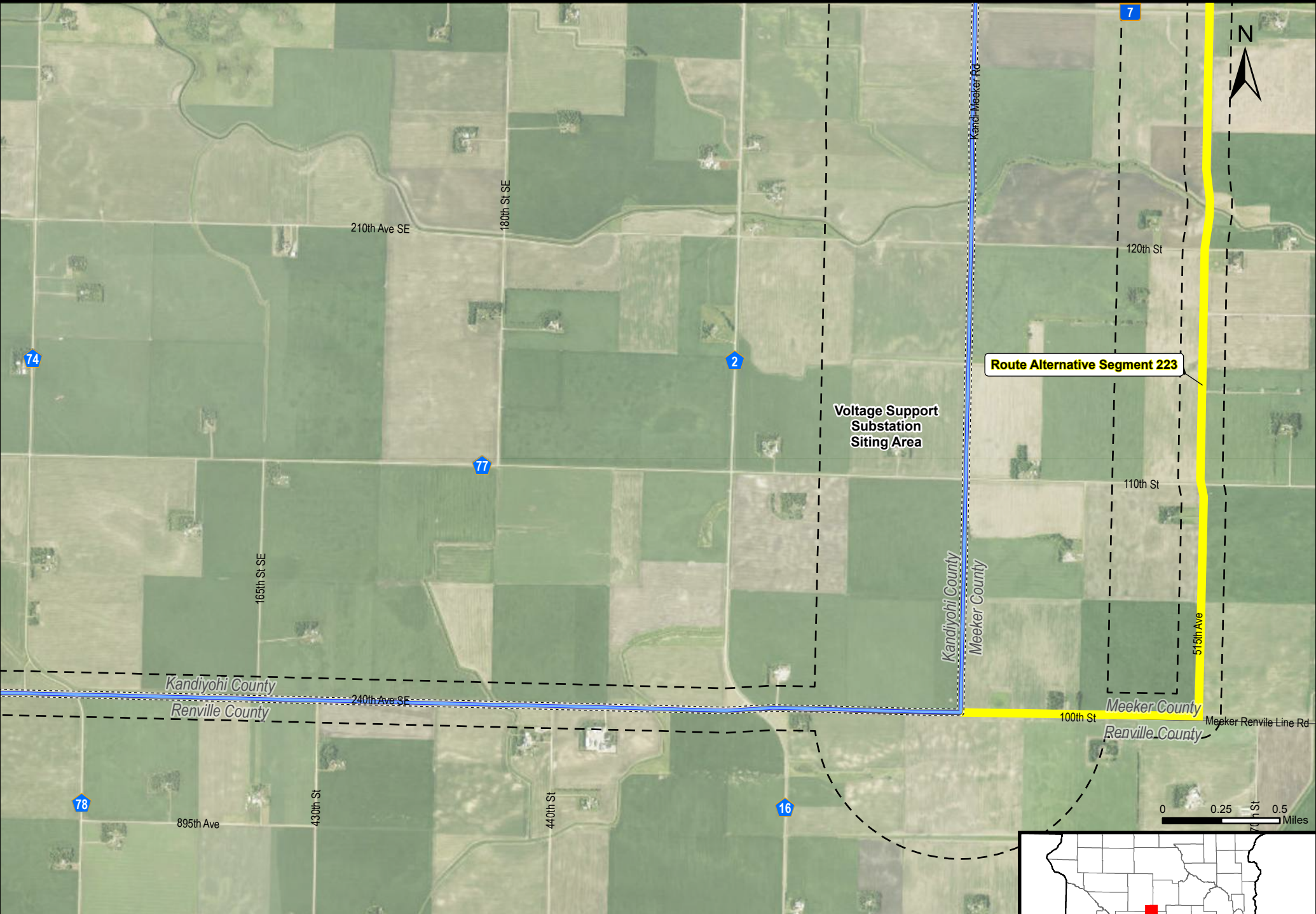


Minnesota Energy Connection
Route Maps | Kandiyohi and Meeker County

- Xcel Energy's Preferred Route
- ALJ Recommended Route
- Route Alternatives
- Right-of-Way (150')
- Route Width
- Municipality
- County Boundary

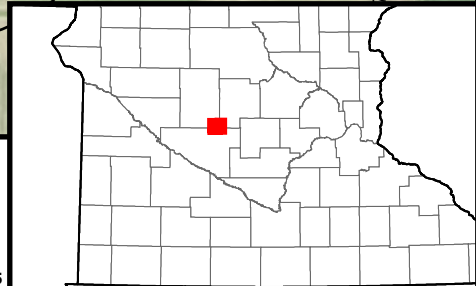


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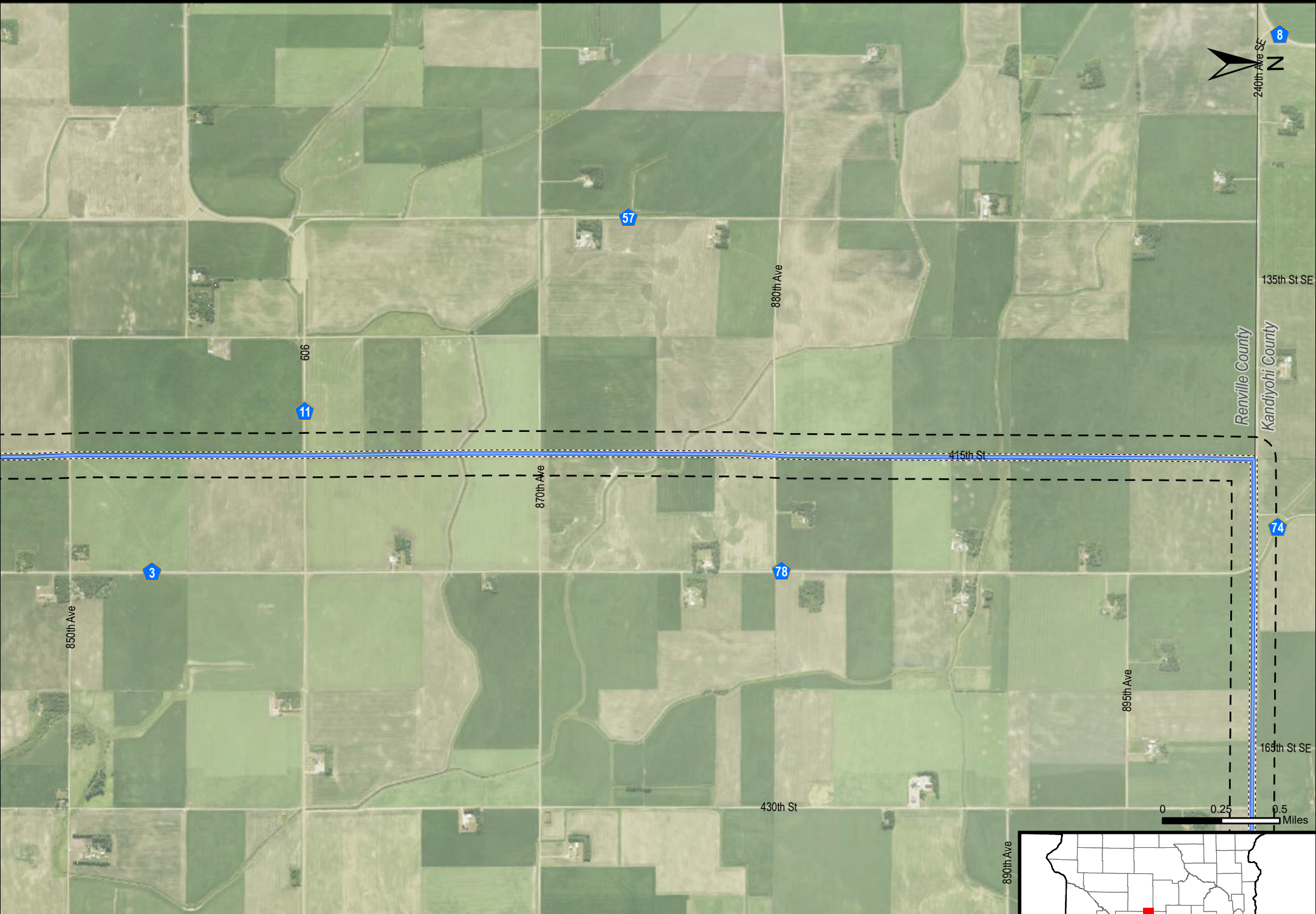


Minnesota Energy Connection
Route Maps | Kandiyohi, Meeker and Renville County

- Xcel Energy's Preferred Route
- Route Alternatives
- Right-of-Way (150')
- Route Width
- Municipality
- County Boundary









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Minnesota Energy Connection

Route Maps | Kandiyohi and Renville County

-  Xcel Energy's Preferred Route
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



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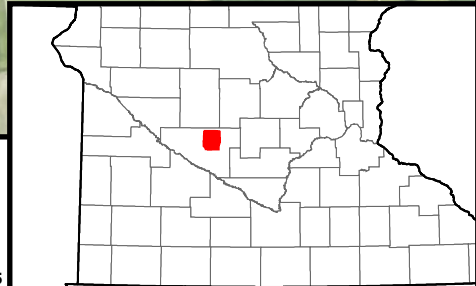
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Minnesota Energy Connection

Route Maps | Renville County

-  Xcel Energy's Preferred Route
-  Route Alternatives
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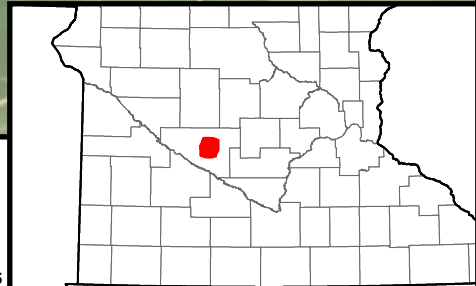


Minnesota Energy Connection

Route Maps | Renville County

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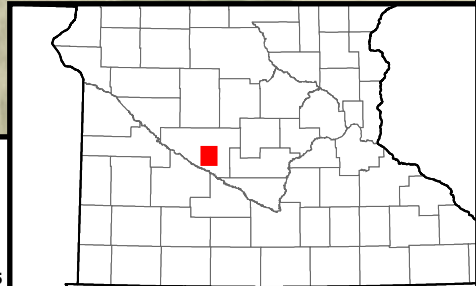




Minnesota Energy Connection

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



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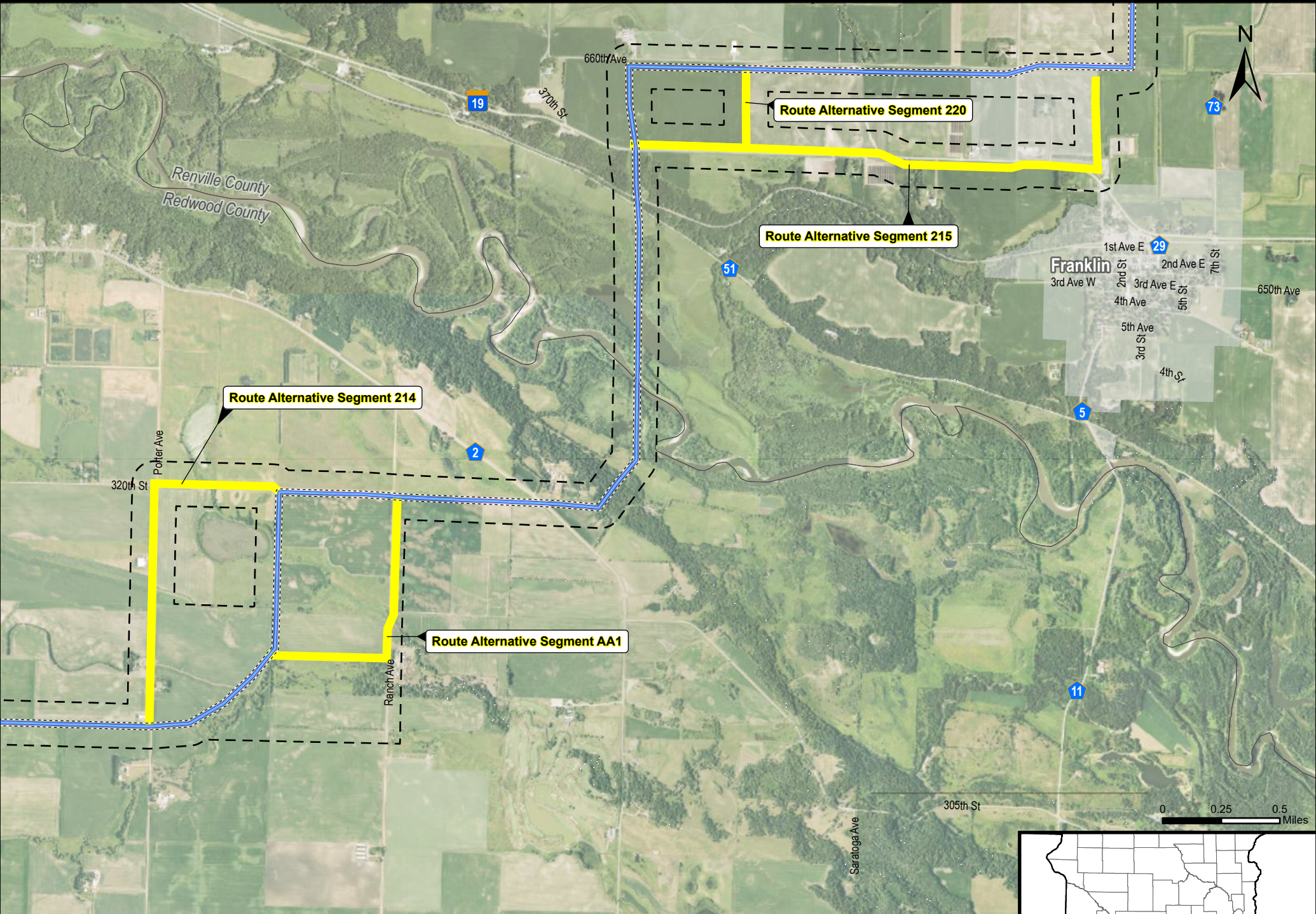
Minnesota Energy Connection

Route Maps | Renville County

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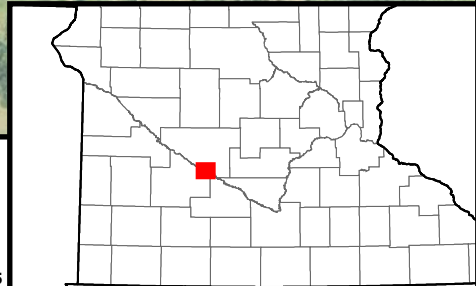
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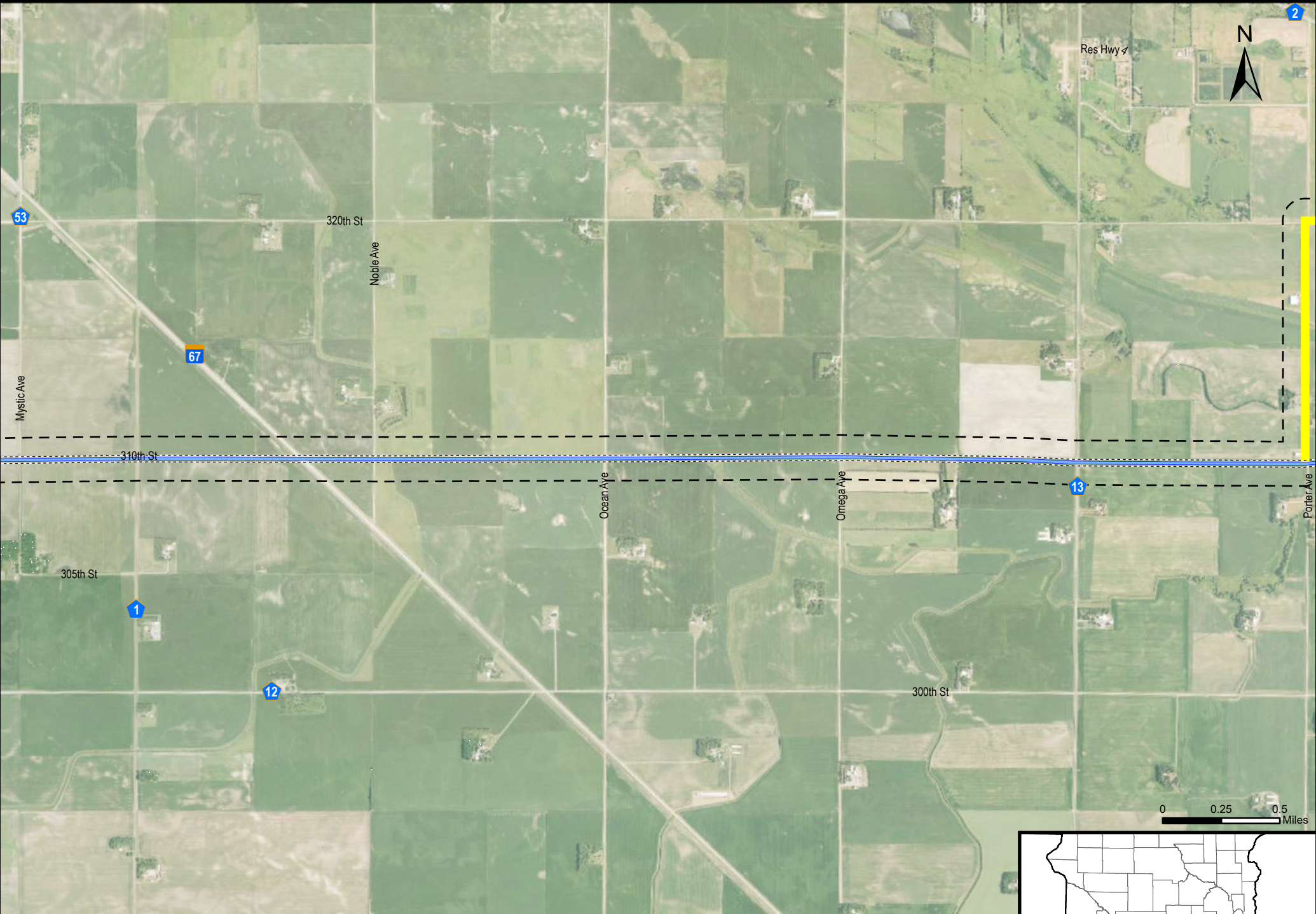
Minnesota Energy Connection

Route Maps | Renville and Redwood County

- Xcel Energy's Preferred Route
- Route Alternatives
- Right-of-Way (150')
- Route Width
- Municipality
- County Boundary









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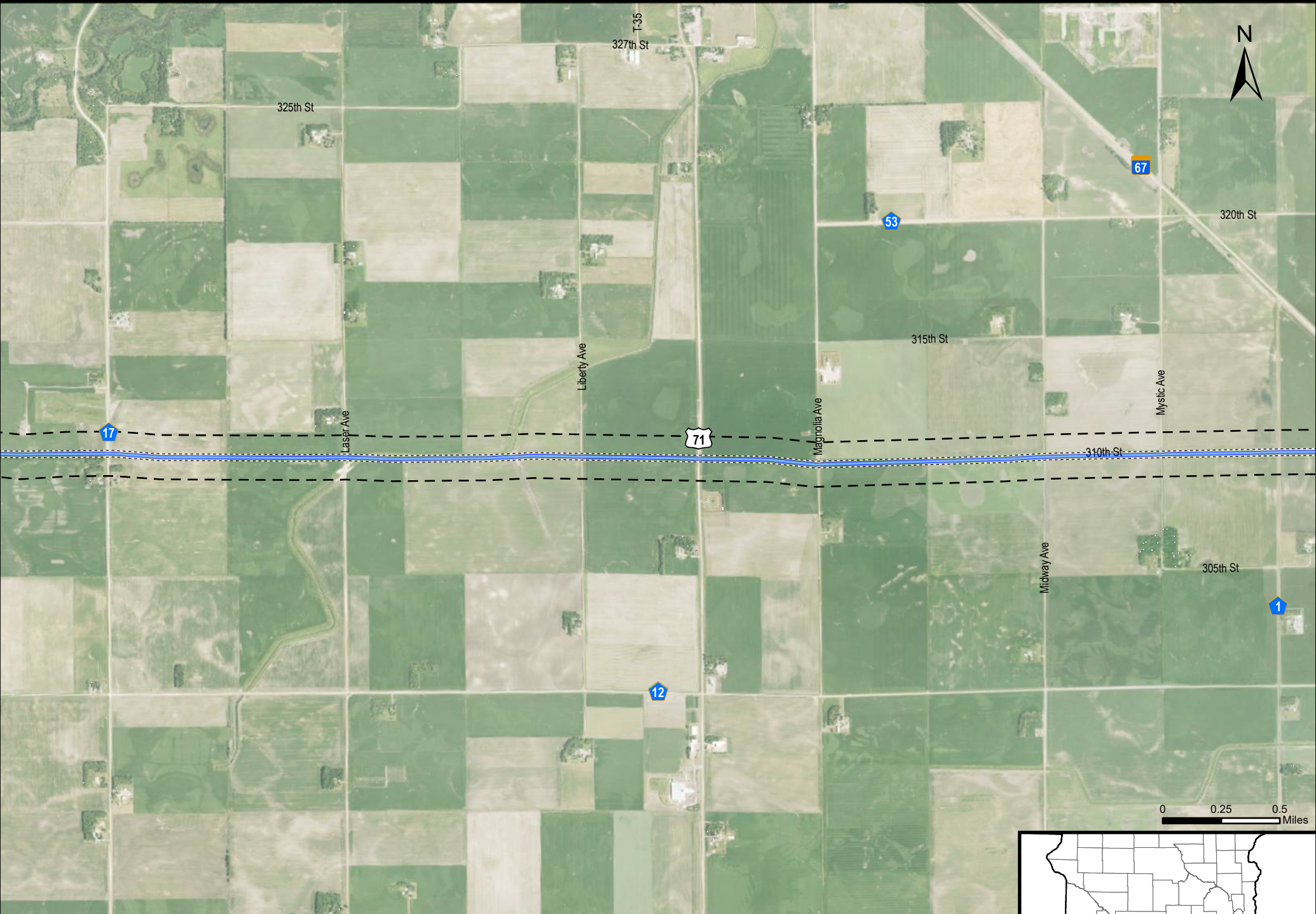
Minnesota Energy Connection

Route Maps | Redwood County

-  Xcel Energy's Preferred Route
-  Route Alternatives
-  Right-of-Way (150')
-  Route Width
-  Municipality
-  County Boundary







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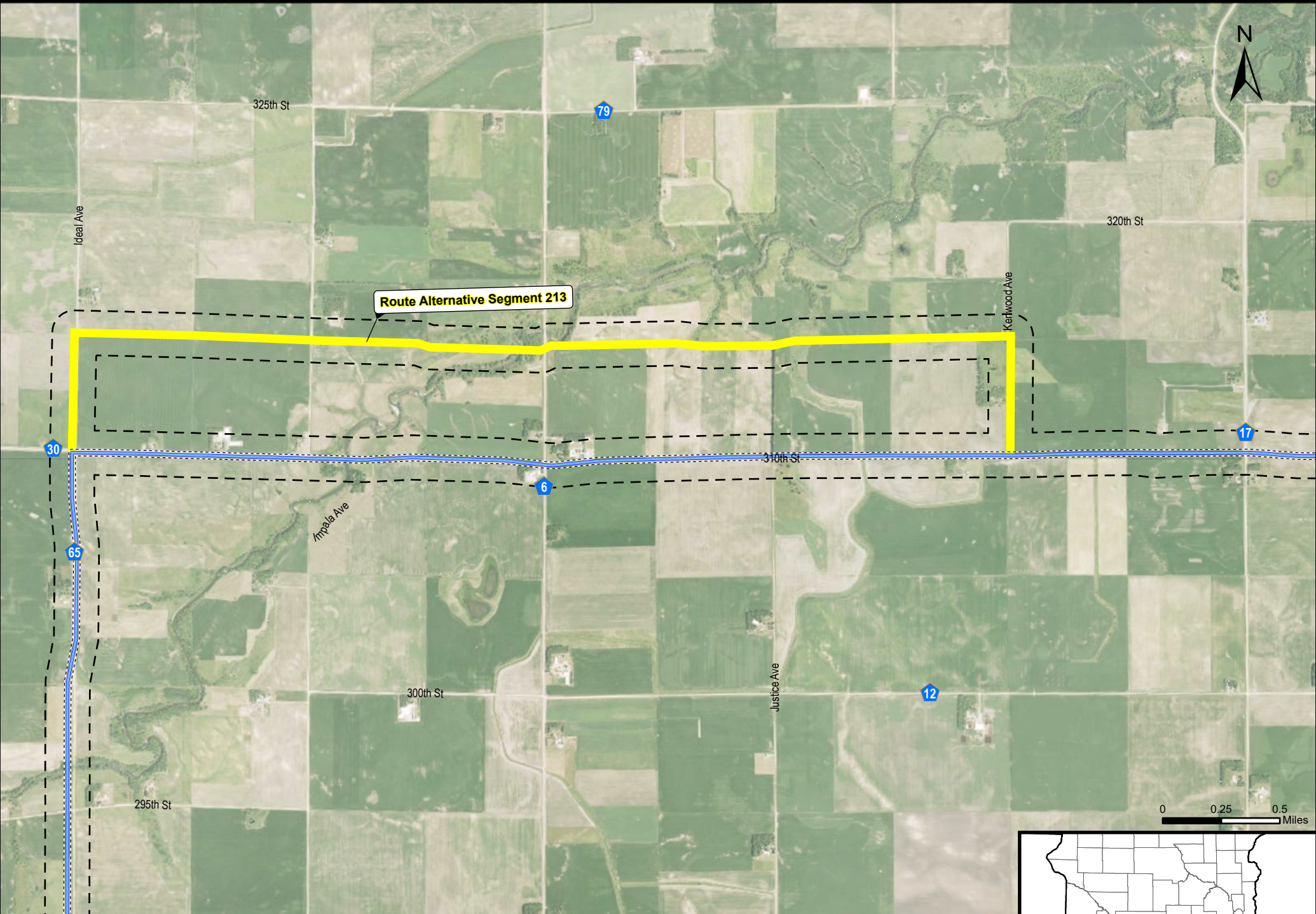


Minnesota Energy Connection







Route Maps | Redwood County

-  Xcel Energy's Preferred Route
-  Route Alternatives
-  Right-of-Way (150')
-  Route Width
-  Municipality
-  County Boundary

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Minnesota Energy Connection
Route Maps | Redwood County

-  Xcel Energy's Preferred Route
-  Route Alternatives
-  Right-of-Way (150')
-  Route Width
-  Municipality
-  County Boundary

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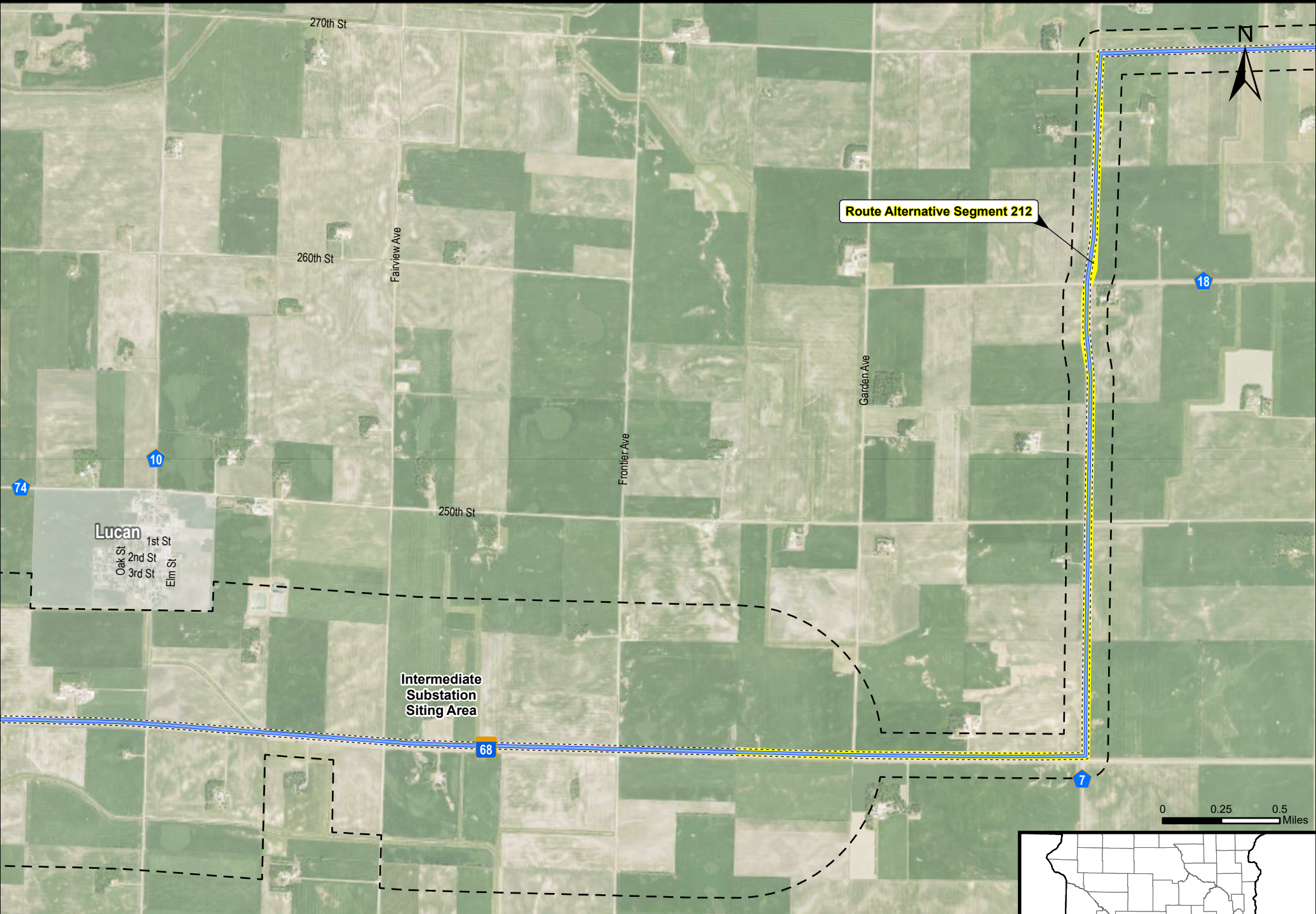
Minnesota Energy Connection

Route Maps | Redwood County

- Xcel Energy's Preferred Route
- Route Alternatives
- Right-of-Way (150')
- Route Width
- Municipality
- County Boundary

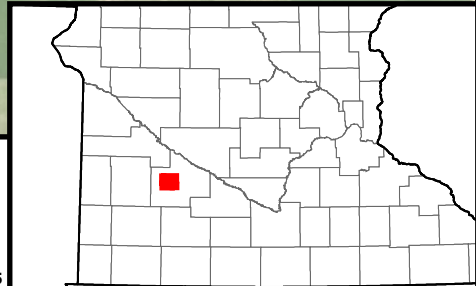
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Minnesota Energy Connection
Route Maps | Redwood County

- Xcel Energy's Preferred Route
- Route Alternatives
- Right-of-Way (150')
- Route Width
- Municipality
- County Boundary



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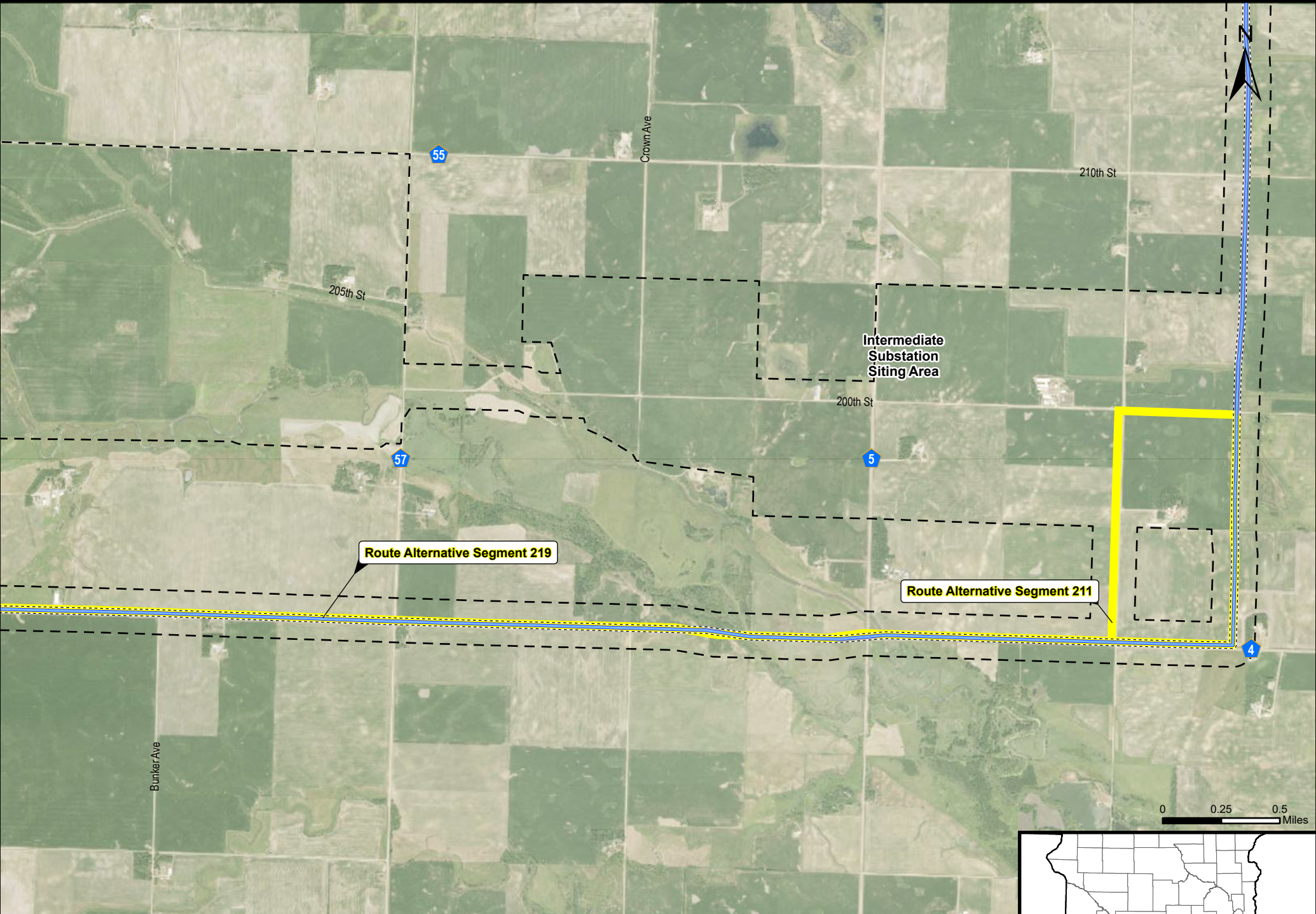


Minnesota Energy Connection
Route Maps | Redwood County

- Xcel Energy's Preferred Route
- Route Alternatives
- Right-of-Way (150')
- Route Width
- Municipality
- County Boundary

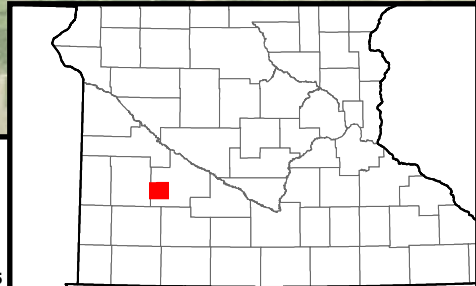
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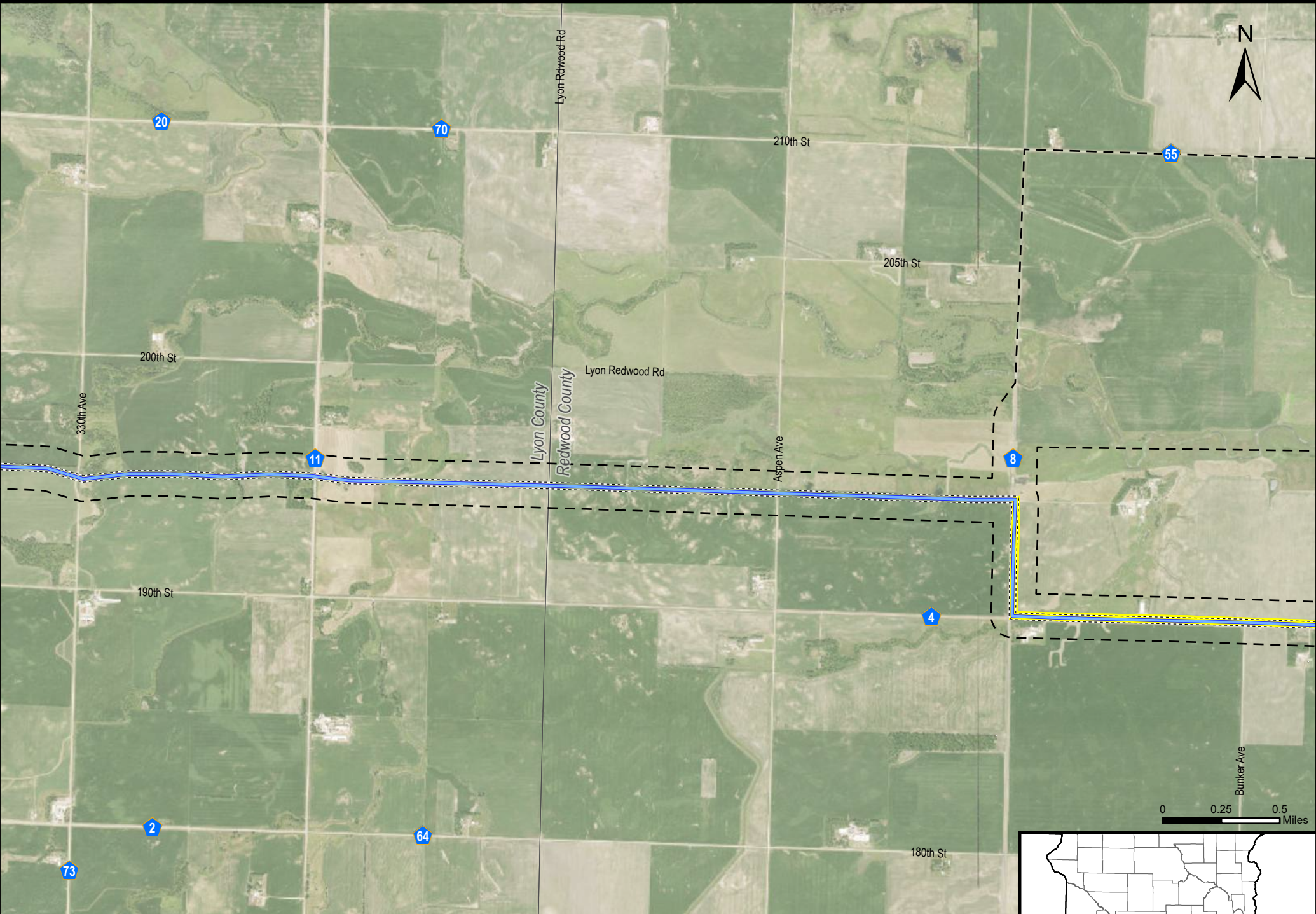


Minnesota Energy Connection
Route Maps | Redwood County

- Xcel Energy's Preferred Route
- Route Alternatives
- Right-of-Way (150')
- Route Width
- Municipality
- County Boundary



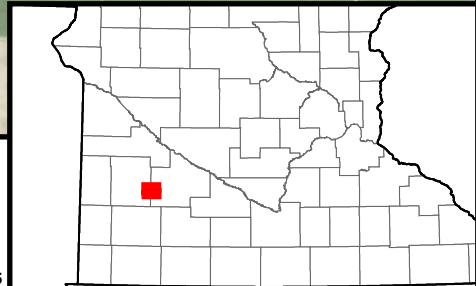
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Minnesota Energy Connection

Route Maps | Redwood and Lyon County

- Xcel Energy's Preferred Route
- Route Alternatives
- Right-of-Way (150')
- Route Width
- Municipality
- County Boundary









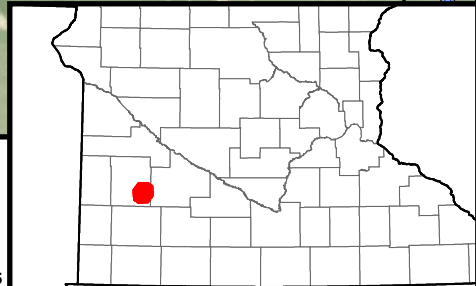
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Minnesota Energy Connection

Route Maps | Lyon County







-  Xcel Energy's Preferred Route
-  Route Alternatives
-  Right-of-Way (150')
-  Route Width
-  Municipality
-  County Boundary

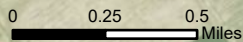
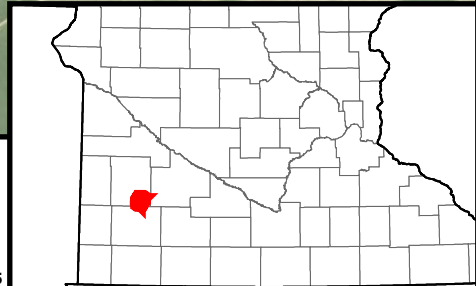


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Minnesota Energy Connection
Route Maps | Lyon County

-  Xcel Energy's Preferred Route
-  Route Alternatives
-  Right-of-Way (150')
-  Route Width
-  Municipality
-  County Boundary



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