

**STATE OF MINNESOTA
OFFICE OF ADMINISTRATIVE HEARINGS
FOR THE PUBLIC UTILITIES COMMISSION**

**In the Matter of the Route Permit
Application for the Minnesota Energy
Connection Project in Sherburne, Stearns,
Kandiyohi, Wright, Meeker, Chippewa,
Yellow Medicine, Renville, Redwood, and
Lyon counties in Minnesota**

OAH Docket No. 23-2500-39782
MPUC Docket No. E002/TL-22-132

**XCEL ENERGY'S
POST-HEARING BRIEF**

INTRODUCTION

Before submitting the Route Permit Application for the Minnesota Energy Connection Project (Project), Northern States Power Company, doing business as Xcel Energy, (Applicant or Xcel Energy) conducted an iterative and detailed route development process that included multiple rounds of public engagement and consideration of the Minnesota Public Utilities Commission's (Commission) routing criteria. The analysis resulted in the Blue and Purple Routes, as identified in the Application. As this proceeding has progressed, Xcel Energy continued its route analysis to take into account the information presented in this record, including public comments and environmental review. Xcel Energy identified a Preferred Route (a modification of the Blue Route) for the Project that incorporates specific route alternatives proposed by members of the public in this proceeding because these alternatives further avoid or minimize impacts.

There is now an extensive record and Xcel Energy respectfully submits that record supports granting a route permit for the Preferred Route because it minimizes impacts to both humans and the environment—balancing these features without prioritizing any single resource over another. Xcel Energy's testimony and comments and its Responses to Hearing Comments and Proposed Findings of Fact, Conclusions of Law, and Recommendations (both of which are being filed concurrently with this Post-Hearing Brief), together address the Applicant's positions on specific

issues and route alternatives. This Post-Hearing Brief does not recount each of those individual issues but, rather, describes the ways in which the Preferred Route is the best route for the Project, considering factors where there are material differences among routes.¹

The record demonstrates that the Preferred Route is the best route for the Project, and Xcel Energy respectfully requests that the Administrative Law Judge recommend that the Commission grant a route permit for the Preferred Route.

THE PREFERRED ROUTE IS THE BEST ROUTE FOR THE PROJECT

Xcel Energy proposed two routes in the Route Permit Application, and the Draft Environmental Impact Statement (DEIS) studied an additional 48 route segments, 11 route connectors, and four alignment alternatives (some of which Xcel Energy has incorporated into its Preferred Route).² With respect to some of the Commission's routing factors, the alternatives analyzed were largely equivalent.³ However, with respect to other factors, there are material differences among routes, and the sections that follow focus on those differences. Ultimately, the analysis continues to demonstrate that the Preferred Route best minimizes potential impacts, considering all routing criteria.

For ease of reference, Table 1 below first identifies the route segments and refinements for the Preferred Route and the end-to-end route options studied in the DEIS, as well as those

¹ This brief is limited to issues within the scope of the route permit proceeding because the Commission ordered the certificate of need proceeding to follow its informal process. *See In the Matter of the Application Completeness Certificate of Need for Two Gen-Tie Lines from Sherburne County to Lyon County, Minnesota*, MPUC Docket No. E002/CN-22-131, Order at 1 (May 2, 2023).

² Ex. Xcel-2 at 7–8 (RP Application); Ex. EERA-12 at 32–59 (DEIS); *see also* Ex. EERA-7 at 7 (Scoping Summary and Recommendation).

³ Ex. EERA-12 at 458–59 (DEIS); *see* Ex. EERA-12 at 195–437 (DEIS).

identified by the Minnesota Department of Natural Resources (MDNR) as that agency’s preferred route options.⁴

Table 1

Region	Xcel Energy Preferred Route	Blue Route	Purple Route	Route Option B	Route Option C	MDNR
A	A6	A3	A1	A7	A2	A6
B	B4 + 212, 216, 219	B4	B1	B2	B3	B4 + 211, 214
C	C4	C4	C1	C2 + 223	C3 + 223	C4 + 223 + 105 (Blue to Purple)
D	D5	D4	D1	D2 + 105	D3 + 105	D1
E	E2	E2	E1	E1 + 231	E2	E1
F	F4	F4	F1	F7	F3/F8 + 108	F1 + 109 or 110
G	G1 + 244	G1	G3	G4	G5	G1 and G4 + (237, 238, 240, 249, or 250+114) + G4 (247 or 248) (Blue to Purple) <i>OR</i> G3 + G5 (241) + G4 (247 or 248) (Purple)

I. THE PREFERRED ROUTE MEETS THE COMMISSION’S ROUTING CRITERIA AND IS THE END-TO-END ROUTE THAT MINIMIZES HUMAN AND ENVIRONMENTAL IMPACTS.

A. The Preferred Route minimizes impacts to residences.

Pursuant to Minn. R. 7850.4100(A), the Commission must consider effects of the route on human settlement. During public outreach, Xcel Energy heard again and again from members of the public that their primary concern was proximity to residences.⁵ Likewise, members of the

⁴ MDNR Comments (Nov. 26, 2024) (eDocket No. [202411-212410-01](#)).

⁵ Ex. Xcel-2 at 32 (RP Application).

public who participated in the Commission’s process frequently highlighted potential residential impacts as a primary concern.⁶ Xcel Energy heard those concerns, and the Preferred Route best minimizes impacts to residences by maximizing distances from residences where feasible.⁷ Table 2 below provides a comparison:

Table 2

	Preferred Route	MDNR Route⁸	Blue Route	Purple Route	Route Option C	Route Option D
Residences within 0-500 feet	146	172	145	159	191	192

To the extent Route Segment 213 is selected as part of the Preferred Route, there would be four fewer residences within 500 feet (142 residences).⁹

As reflected in Table 2 above, in comparison to other end-to-end route options, the Preferred and Blue Routes are within 0-500 feet of the fewest number of residences. This

⁶ See, e.g., Public Comment by Brian Miles (Nov. 1, 2024) (eDocket No. 202411-211532-01); Public Comment by Steven D. Willis (Nov. 21, 2024) (eDocket No. [202411-212262-05](#)); Public Comment by William and Christine Schwandt (Nov. 22, 2024) (eDocket No. [202411-212328-05](#)); Public Comment by Ron and Deb Schabel (Nov. 25, 2024) (eDocket No. [202411-212380-01](#)).

⁷ Ex. Xcel-16 at 16 (Direct Testimony and Schedules of Matthew Langan [Langan Direct]).

⁸ As described further in Xcel Energy’s Response to Hearing Comments, because MDNR’s comments identified multiple potential route segments in some regions, to allow for some comparison among MDNR’s route preferences, Xcel Energy’s Preferred Route, and the Blue and Purple Routes, the MDNR route presented in the table above includes the following route segments: Route A6; Route B4 and Route Segments 211 and 214; Route C4, Route Segment 223, and Route Connector 105; Route D1; Route E1; Route F1 and Route Connector 110; and Route G1 with Route Segments 240, 249, and 115; and G3 with Route Segment 248. Where MDNR indicated a preference for overlapping route segments, the route above includes the segment that (at least in Xcel Energy’s view) is least impactful in comparison to the other MDNR route segment preferences in the same area. Selecting a different combination of MDNR’s preferred route segments in areas where they overlap would result in different calculations.

⁹ Ex. Xcel-19 at 6 (Surrebuttal Testimony and Schedules of Matthew Langan [Langan Surrebuttal]).

minimizes residential impacts and is directly responsive to the primary concern Xcel Energy heard from members of the public.

B. The Preferred Route minimizes reliability risks.

As part of its routing decision, the Commission considers “electrical system reliability.”¹⁰ The Project is proposed to interconnect new renewable generation to replace, in part, coal generation being retired at Sherco. Enhancing reliability is particularly critical for the Project because it will be a radial line that, based on a pending settlement, is anticipated to support more than 2,000 MW of wind and 420 MW of firm dispatchable resources. Transmission line circuits that cross over one another present operational and maintenance challenges that also pose reliability challenges.¹¹

Most significantly, there is a greater risk that the outage of one line can result in an outage of the second line at the same time, reducing system resiliency. It can also result in structural damage to both transmission lines – complicating and increasing restoration times. New crossings also create safety risks because under normal operating conditions, one line may need to remain energized while maintenance work is occurring on the other transmission line at the same location. Taking multiple circuits out of service can stress the remaining system components and lead to overloads and voltage issues, and potentially stability concerns should there be a contingency (loss of) another system element at the same time. Because of these safety and reliability issues, good utility practice is to minimize new line crossings when routing new high voltage transmission lines.¹² That is particularly the case for a radial line supporting as much generation as this Project.

¹⁰ Minn. R. 7850.4100(K).

¹¹ Xcel Energy DEIS Comments at 6-7 (Nov. 25, 2024) (eDocket No. [202411-212383-01](#)).

¹² Ex. Xcel-18 at 7 (Direct Testimony and Schedule of Jason Standing (Standing Direct)).

Here, the Preferred Route, Blue Route, and MDNR proxy route would require 12 crossings of existing lines 115-kV or greater. The Purple Route would require 23 crossings – nearly twice as many.¹³

C. The Preferred Route follows existing rights-of-way where doing so minimizes potential impacts.

Pursuant to Minn. R. 7850.4100(H) and (J), the Commission considers use of or paralleling existing rights of way, survey lines, division lines, field boundaries when designating a route for the Project. Consistent with Minnesota’s routing criteria, Xcel Energy sought to route the Project along existing rights-of-way, division, and property lines where feasible. As such, approximately 91 percent of the Preferred Route follows existing infrastructure right-of-way or parcel, section, or division lines.¹⁴

Table 3

	Xcel Energy Preferred Route	MDNR Route	Blue Route	Purple Route
Following existing right-of-way, parcel, section, division lines (percent) ¹⁵	91	91	89	89

There are, however, instances when following existing rights-of-way could increase, rather than minimize, potential impacts. For example, during public open houses, and in written comments received, landowners expressed concerns that proposing routes adjacent to existing transmission lines that were already located on field/property lines would increase the impacts to

¹³ Xcel Energy Response to Hearing Comments (Dec. 13, 2024).

¹⁴ Xcel Energy Response to Hearing Comments (Dec. 13, 2024); Ex. EERA-12 at 199, 204, 220, 237–38, 244–45, 265–66, 285, 289, 304, 317, 333, 343, 363, 369–70, 392, and 398 (DEIS).

¹⁵ The values in this row reflect the values from the RP Application and do not include the green segment.

agricultural operations because they would result in structures being placed farther into a farm field.¹⁶ Likewise, in some instances, following an existing road right-of-way was not feasible where there are residences in close proximity on either side of the roadway.

D. The cost of the Preferred Route compares favorably to other routes.

As part of its routing decision, the Commission must also consider costs of constructing, operating, and maintaining the selected route.¹⁷ Here, the Preferred Route and the Blue Route compare favorably to other routes when considering cost. The cost of any route is affected by the length of that route, but also by a number of other factors that can impact design and construction procedures/timelines. These factors include terrain, alignment (straight v. angle/corner), soil conditions, existing transmission crossings, proximity to pipelines and railroads, and areas that may require specialized construction practices or mitigation.¹⁸

Xcel Energy has estimated the following costs for the route analyzed in the DEIS, as well as its Preferred Route and an end-to-end route based on MDNR's route preferences. Table 4 reflects those cost estimates.¹⁹

¹⁶ Ex. Xcel-2 at 27 (RP Application).

¹⁷ Minn. R. 7850.4100(L).

¹⁸ Xcel Energy described these factors in response to a supplemental information inquiry from EERA. Part, but not all, of that response was included in the DEIS. The full response is attached to Xcel Energy's Response to Hearing Comments as Attachment A, being filed concurrently with this. *See* Xcel Energy Response to Hearing Comments at Attachment A (Dec. 13, 2024).

¹⁹ The values in Table 4 differ from the values in the DEIS; as described in the Surrebuttal Testimony of Joseph Samuel, the DEIS values appear to be based solely on a cost per mile. However, the DEIS values do not account for the additional variables that impact the cost of a route, although Xcel Energy conducted this analysis. Further, Xcel Energy has since updated the estimated cost per mile for the Project. The values above do not reflect those updates, but Xcel Energy anticipates that the cost update would affect the route alternatives by generally the same magnitude. *See* Ex. Xcel-20 at 4–6 and Schedule 1 (Surrebuttal Testimony and Schedule of Joseph Samuel [(Samuel Surrebuttal)]).

Table 4

	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

Although cost is not determinative when selecting a route for the Project, the fact that the cost of the Preferred Route is generally anticipated to be commensurate with the Blue Route and less than the other routes considered in the record is yet another factor that weighs in favor of selecting the Preferred Route for the Project.

E. Region-specific analysis.

1. Southern portion of the Project: Regions A, B, and C.

In the southern portion of the Project (Regions A, B, and C), both Xcel Energy and MDNR agree that the Blue Route (with modification) is the best route for the Project.²⁰ Specifically, Xcel Energy and MDNR agree that the following route segments should be selected for the Project:

Region A. In Region A, Xcel Energy and MDNR agree that the Blue Route with Route Segment 202 (Route A6) should be selected. Route A6 follows more existing road right-of-way and the corresponding section of the Blue Route (Route A3) and, as compared to the corresponding section of the Purple Route (Route A1), is in proximity to fewer homes (4 v. 12 homes within 75-250 feet).²¹

Region B. In Region B, Xcel Energy and MDNR agree that the Blue Route (Route B4) is generally the best route segment, although each Xcel Energy and MDNR also propose to

²⁰ See MDNR Comments (Nov. 26, 2024) (eDocket No. [202411-212410-01](#)).

²¹ Ex. EERA-12 at 197–99 (DEIS).

incorporate route segment alternatives.²² Xcel Energy's Preferred Route in Region B also includes Route Segments 212, 216, and 219 because Route Segments 212 and 219 parallel additional infrastructure right-of-way, and Route Segment 216 increases distance from residences.²³ MDNR prefers Route Segments 211 and 214 to modify Route B4.²⁴ Route Segment 211 is largely similar to Route Segment 219 (incorporated by Xcel Energy), but introduces two additional angle structures as compared to Route Segment 219.²⁵ Xcel Energy does not support Route Segment 214 because it would require the installation of structures within a Minnesota Board of Water and Soil Resources easement.²⁶

Region C. In Region C, Xcel Energy and MDNR generally agree that the Blue Route (Route C4) should be selected. However, MDNR would also include Route Segment 223, and then connect to the Purple Route using Route Connector 105 on the northeastern portion of Region C.²⁷ As discussed in Section II(B) below, Xcel Energy does not object to a modified version of Route Segment 223 being incorporated into the route, but does object to Route Segment 223 as proposed because it is in proximity to more residences than the Preferred Route. For the reasons discussed generally in Section (2) below, Xcel Energy also does not support using Route Connector 105 to transition to the Purple Route.

²² MDNR Comments at 1–2 (Nov. 26, 2024) (eDocket No. [202411-212410-01](#)).

²³ Ex. EERA-12 at 235–41 (DEIS).

²⁴ MDNR Comments at 1 (Nov. 26, 2024) (eDocket No. [202411-212410-01](#)).

²⁵ Ex. Xcel-16 at 15, Schedule 2 at 5 (Langan Direct).

²⁶ Xcel Energy Response to Hearing Comments (Dec. 13, 2024).

²⁷ MDNR Comments at 1–2 (Nov. 26, 2024) (eDocket No. [202411-212410-01](#)).

2. Northern portion of the Project: Regions D, E, F, and G).

In the northern portion of the Project (Regions D, E, F, and G), the record supports the selection of Xcel Energy's Preferred Route (a modified Blue Route) because it best minimizes impacts to *both* human and environmental features, whereas other route combinations prioritize some features over others. This section discusses the primary differences between the Preferred Route (modified Blue Route) and Purple Route in these regions.

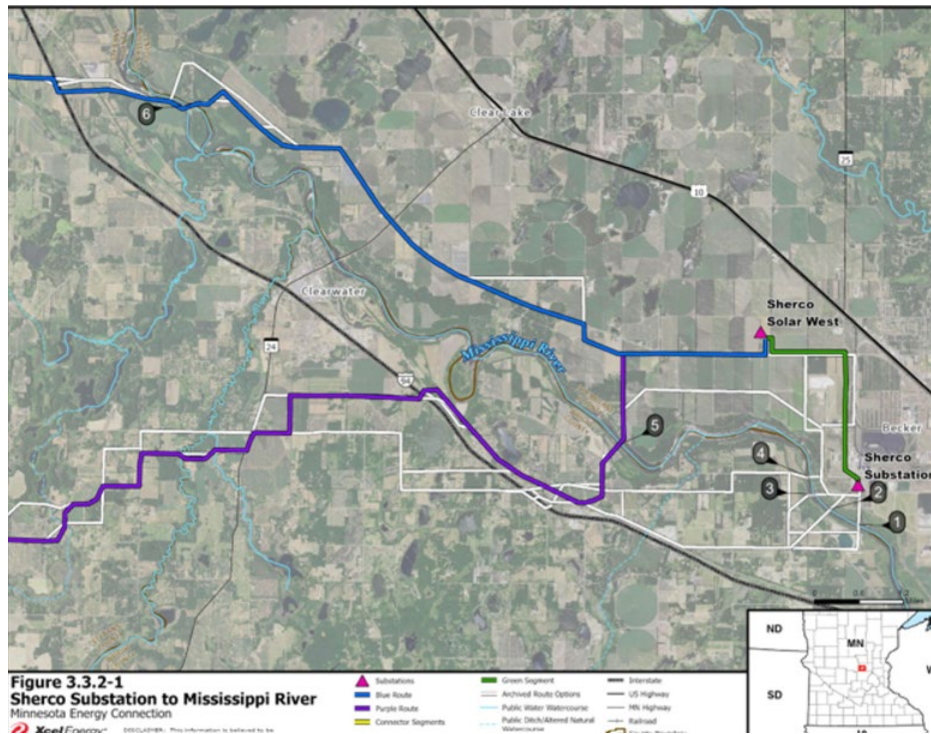
(1) The Preferred Route includes the optimal crossing of the Mississippi River.

For a long linear project like this one, the initial route development process focuses on identifying appropriate crossing locations for any significant features that will be crossed. The Mississippi River crossing included in the Preferred Route is the optimal crossing. Although it would create a new crossing of the Mississippi River, Xcel Energy will construct using a horizontal design, as the MDNR recommended, which will minimize avian impacts as well as minimize impacts to humans and the natural environment. Xcel Energy selected this location after a thorough review of locations with existing infrastructure locations as detailed in the record.

For this Project, as discussed in Section 3.3 of the Application, Xcel Energy's initial route development process included a detailed and iterative analysis of potential crossings of the Mississippi River.²⁸ As part of that process, Xcel Energy identified six potential locations for the Project's crossing of the Mississippi River, as depicted in Figure 3.3.2-1 of the Route Permit Application, included below:²⁹

²⁸ Ex. Xcel-2 at 36–45 (RP Application).

²⁹ Ex. Xcel-2 at 36–45 (RP Application).



Xcel Energy determined not to propose a route using crossings 1-4 because the area includes a residential area with limited availability for a 150-foot right-of-way. Crossing 5 follows existing infrastructure and is included within the Purple Route. Crossing 6 does not follow existing infrastructure but was identified and included in the Blue Route (and Preferred Route) because it is adjacent to undeveloped land and crosses a narrow channel of the river.³⁰ During the scoping process, members of the public proposed two additional crossings of the Mississippi River – Route Segments 245 and 246, neither of which Xcel Energy supports. Route Segment 245 does not follow existing infrastructure at its crossing of the Mississippi River; Route Segment 246 does.³¹ Figures 1 and 2, showing each of these crossings, are included below for reference.³²

³⁰ Ex. Xcel-2 at 37 (RP Application); Ex. Xcel-16 at 17:16–21 (Langan Direct).

³¹ Ex. EERA-12 at 431–32 (DEIS).

³² The figures are excerpts from DEIS Maps 3-19 and 3-20. The yellow squares in each figure represent residences. Ex. EERA-12 at Maps 3-19 and 3-20 (DEIS).

Xcel Energy recognizes that utilizing existing crossings is generally preferred because doing so often avoids/minimizes potential aesthetic, vegetation, and other impacts. Specifically here, Xcel Energy understands that MDNR prefers a route that uses existing crossings over the Mississippi River, including the Purple Route or Route 246. However, in these specific circumstances, Xcel Energy does not support the Purple Route's crossing of the Mississippi River (G3), nor does Xcel Energy support Route Segment 246 because both routes increase impacts on human settlement, as well as presenting other potential issues.³³

More specifically, Route G3 (Purple Route) would follow existing infrastructure at the river crossing but would result in residential impacts south and west of Sherco. In contrast, the Preferred Route's crossing of the Mississippi River would be adjacent to undeveloped land and would cross at a narrow river channel.³⁴ Route G3 (Purple Route) would also require crossing an existing transmission line at this river crossing location, as compared to zero line crossings for the Preferred Route.³⁵ Reliability issues associated with line crossings were discussed further in in Section I(B) above. The Purple Route also results in increased environmental impacts south of the Mississippi River crossing (as compared to the Blue/Preferred Route); those impacts are discussed in Section (2) below.

Likewise, Route Segment 246 (an alternative crossing of the Mississippi River on the Blue Route) would increase impacts on residences because there is not sufficient right-of-way along River Road in this area.³⁶ Specifically, there would be 42 residences within 500 feet of this route

³³ Ex. Xcel-16 at 14:9–15:5 (Langan Direct).

³⁴ Ex. Xcel-16 at 17:18–20 (Langan Direct).

³⁵ Ex. Xcel-16 at 17:16–21 (Langan Direct); Xcel Energy Response to Hearing Comments (Dec. 13, 2024).

³⁶ Ex. Xcel-16 at 14:11–13 (Langan Direct).

(shown in yellow boxes on the figure below), as compared to two residences within the corresponding section of the Preferred Route. Route Segment 246 is also approximately 3.4 miles longer than the Preferred Route, with a corresponding increase in costs and impacts.³⁷ Xcel Energy also does not support Route Segment 245 because it both increases impacts on residences and does not follow existing infrastructure at the Mississippi River crossing.³⁸

Overall, the Preferred/Blue Route's crossing of the Mississippi River should be selected because it minimizes human and environmental impacts, as compared to the alternative crossings that do follow existing infrastructure. Likewise, Xcel Energy will use a horizontal configuration for the Mississippi River crossing, particularly given that the Preferred Route is not an existing crossing.

(2) *The Preferred Route appropriately avoids and minimizes potential natural resource impacts.*

In addition to minimizing residential impacts as compared to other routes, the Preferred Route also presents benefits in comparison to other routes when considering potential impacts on certain natural resource areas.

More specifically, multiple oral and written comments were provided expressing concern over potential impacts on the Fish Creek / Fish Lake areas.³⁹ Comments described concerns about impacts to sensitive wetlands in the area, prior and ongoing restoration efforts in the area, floodplains, and wildlife. The Purple Route crosses the Fish Creek / Fish Lake area, but the

³⁷ Ex. Xcel-16 at 15:1–2 (Langan Direct).

³⁸ Ex. EERA-12 at 431–32 (DEIS).

³⁹ See Monticello 12:00 p.m. Public Hearing Transcript at 24:7-10; 30:13-17; 38:22-25 (Oct. 29, 2024); see also Public Comment by Gretchen Carlson (Nov. 25, 2024) (eDocket No. [202410-211374-01](#)); Public Comment by Karen Durant (Nov. 25, 2024) (eDocket No. [202411-212380-01](#)); Public Comment by Ron and Deb Schabel (Nov. 25, 2024) (eDocket No. [202411-212380-01](#)); Public Comment by Clearwater Township Board (Nov. 25, 2024) (eDocket No. [202411-212392-01](#)).

Preferred/Blue Route avoids these areas. Likewise, the North Fork of the Crow River is a Minnesota Wild and Scenic River designated as recreational.⁴⁰ Both the Purple and Blue/Preferred Routes cross this river, but the Blue/Preferred Route does so in a less impactful location. Specifically, the Blue/Preferred Route crosses the North Fork of the Crow River along a state highway (Highway 22), whereas the Purple Route's crossing is along a local (unpaved) road.

II. MODIFICATIONS TO THE PREFERRED ROUTE.

In addition to the Preferred Route, Xcel Energy identified two route segments to which it does not object being incorporated into the Project's route. Each is described below.⁴¹

A. Route Segment 213 increases distance from residences, with trade-offs.

Route Segment 213 was proposed, among other things, to avoid nearby dwellings. Oral and written comments were also provided generally in support of Route Segment 213. Xcel Energy's initial review of Route Segment 213 identified several issues related to this alternative, including the close proximity to the MDNR Sheridan Wildlife Management Area (WMA) and state conservation easements along the Redwood River, a greenfield crossing of the Redwood River, additional wetland crossings, and three additional angle structures that increase cost. Route Segment 213 does, however, provide a net reduction of four residences within 300 feet of the transmission line. Therefore, although there would be an increase in cost, Route Segment 213 would be feasible because the Project alignment could avoid the WMA and conservation easements. Xcel Energy does not object to the extent the Commission selects Route Segment 213 as part of the Project's route.⁴²

⁴⁰ Ex. Xcel-2 at 39 (RP Application).

⁴¹ Further, Xcel Energy previously indicated that it had no position on Route Segment 239, which was proposed by Jason Pierskalla. That continues to be Xcel Energy's position because that route segment appears to have similar impacts as the corresponding section of the Preferred/Blue Route.

⁴² Ex. Xcel-19, Schedule 2 at 6 (Langan Surrebuttal).

B. Modified Route Segment 223 avoids direct impacts to the Lux Airstrip.

In Section 5.2.10.6.2, the DEIS notes that the Blue Route could impact the existing Lux Airstrip, a private grass airstrip, and states that “Route Segment 223 . . . is recommended to avoid direct impacts” to that airstrip. Likewise, written comments were submitted concerning Route Segment 223. Xcel Energy does not support the entirety of Route Segment 223 because of increased impacts to residences on the southern portion of the alternative and constructability concerns associated with multiple potential crossings of an existing transmission line. However, Xcel Energy does not oppose the northern approximately one mile of Route Segment 223 and identified a modified version of Route Segment 223, along with the human and environmental impacts associated with the modified route segment.⁴³

DRAFT ROUTE PERMIT

In its Response to Hearing Comments, Xcel Energy also included comments on the Draft Route Permit filed by the Commission and included in the DEIS. For the reasons stated in its Response, the record supports Xcel Energy’s requested revisions. Xcel Energy also does not object to MDNR’s requested conditions related to facility lighting, wildlife-friendly erosion control and coordination regarding avian flight diverters. To date, no other revisions or conditions for the Draft Route Permit have been identified and are thus not supported by the record. Xcel Energy reserves the right to respond to any late-identified proposed revisions or conditions.

⁴³ Ex. Xcel-16 at 12–14 (Langan Direct).

CONCLUSION

Xcel Energy respectfully requests that the Administrative Law Judge recommend that the Commission grant a route permit for the Preferred Route, which is the Blue Route, as modified by Route Segments 202, 212, 216, 219, 226, and 244.

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