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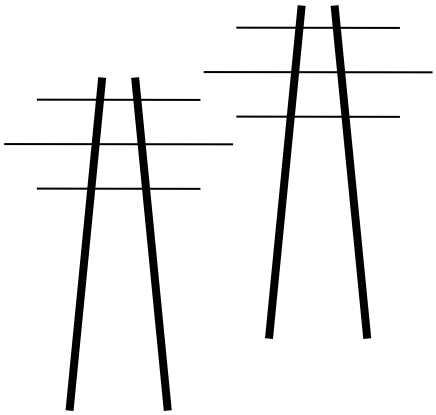


June 2, 2026

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

Sam Weaver
Environmental Review Manager
Public Utilities Commission
121 – 7th Place East, Suite 350
St. Paul, MN 55101-2147

RE: Considerations for Environmental and Substantive Review
Application of Xcel Energy and Echo Zone LLC for Route Permit
PUC Docket E002/TL-26-135
PUC Transmission Dockets CN-25-117; CN-25-121; and ESA Docket M-26-170

Dear Ms. Bergan and Mr. Weaver:

Although I am representing clients in two of the above-captioned dockets, **I am filing this comment as an individual** noticing the connections and issues that are tied to this short data center transmission line that should be addressed. As facts come out, my clients may incorporate these matters into their advocacy in the 765 kV dockets.

There are multiple "phased and connected action" considerations that should be incorporated in the Skyway data center 345kV transmission line's Environmental Review and the Application, and also in the other dockets listed above, the 765 kV lines and the Xcel Energy ESA docket.

One issue is that at one of the recent open houses in Zumbrota, and I confess that I'm not sure whether it was for "PowerOn Midwest" CN-25-117 or "Gopher to Badger Link" CN-25-121, I asked about connections between the 765 kV lines and the data center. Many both in my client groups and generally in this area, have questions about whether there is a connection. Repeatedly we've been told at Open Houses and Commission meetings that there is no connection between the 765 kV lines and the data center, that the Pine Island data center was not dependent on the 765 kV lines and that the data center was not part of the planning for the 765 kV lines.[1] However, at one of the meetings, I was told that there would be a 345kV line running from the new 765 kV substation to the North Rochester substation powering CapX 2020 Hampton to La Crosse and the data center line originating at this same substation. That's a very relevant factoid that should be in all the dockets.

[1] Similarly, I've also been told that there is no connection, no plan, no dependence, of the Hermantown data center on the Iron Range-Arrowhead 345kV transmission project, PUC Docket CN-25-111 and TL-25-112.

If these 765 kV and 345 kV substations are indeed connected together, if the 345kV "North Rochester" substation powering the data center, per the lines on the "Project Overview Map,"[2] has that link from the 765kV substation to the 345 kV substation, it should be shown on that Skyway map and be addressed in the application, and in all the applications, including the CN-25-117 and CN-25-121. Why? Well, they're "phased and connected actions," and as we say in transmission "It's all connected."

Second, many concerned with the 765 kV transmission line, and many concerned with the Google Echo Zone data center, and many concerned about the Electric Service Agreement (hereinafter "ESA") want to know where the electricity is coming from. Transparency matters.

Another issue is that the ESA states that the 345 kV to the data center is one of **two** planned 345kV lines, and the Skyway application is just one 345kV line:

> **B. Project Timeline**
>
> The facility is targeted to achieve initial service with one (1) of two (2) planned 345kV lines to its facilities by the Early Energization Target of **[TRADE SECRET DATA BEGINS TRADE SECRET DATA ENDS]**.

Petition for ESA, p. 3. The where, what, why, and when of this second 345kV transmission line should be disclosed and addressed in the Environmental Review. This appears to mean that the data center will be built in multiple phases, with a second 345kV line planned for the future. If this is correct, that should be clearly stated in all the dockets, with the ultimate planned need for two 345kV lines explained.

Third, the capacity of this transmission line, amps and MVA rating, should be clearly stated, particularly where this is one transmission project of two that are planned. At an open house, I think in Zumbrota (but when, which project?), I was told that the data center would need 1,100 MW, and the Skyway application states a similar upper range for that one 345 kV project:

Structure Type	System Condition	Current (Amps)
345 kV/345 kV Double-Circuit Monopole	Peak System Energy Demand (1100 MVA/1100 MVA)	1850/1850
	Average System Energy Demand (660 MVA/660 MVA)	1100/1100

See Skyway application, **Table 6.4-4. Magnetic Field Calculation Summary (mG).**

[2] Page 6 of the Commission's Notice of Complete Route Permit Application and Public Information Meetings, June 2, 2026.

As above, if the plan is for two 345 kV transmission lines crossing Hwy. 52 from the substation to the data center(s), that should be stated, and environmental review should take that into account.

Fourth, the ESA states planned additions of 1,400MW wind, 200MW solar, and 300MW iron air battery. It is likely some or all of these resources will be sited nearby, using the available transmission and powering the data center. A relatively large solar proect is nearby, and with all the transmission coming into and going out of the "North Rochester" substation, it would be an ideal site for a battery installation. The details of the wind, solar, and battery installations should be disclosed and impacts considered in the 345 kV Skyway transmission docket, both 765kV transmission dockets, and Xcel's Electric Service Agreement docket, substantively and in environmental review.

Fifth, the DOT has announced that crossings of Highway 52 will be closed, including 500th at the planned transmission line crossing and next two median crossings heading north.

Project update, Spring 2026

06 May 2026

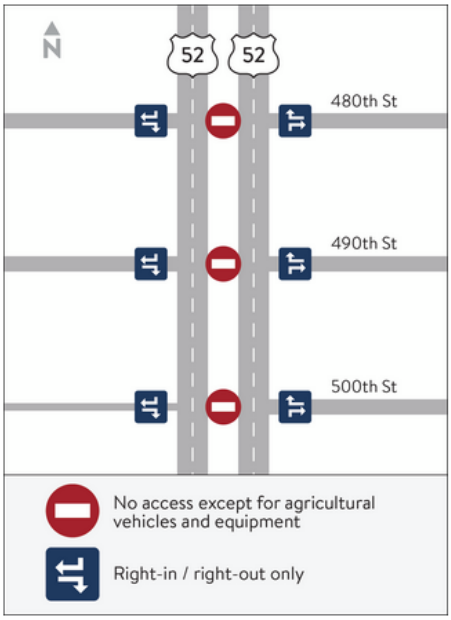
Access Changes at 480th St., 490th St. and 500th St.

To improve safety and traffic flow, the project will close the medians at 480th St., 490th St., and 500th St.

The closure of these medians will restrict left-turn movements on and off the highway, as well as any crossing movements at these streets.

The following improvements are no longer moving forward with the project and may be incorporated into future projects:

- The unbonded overlay south of Oronoco
- Snow fences will not be included in the proposed project



[3]

The Skyway transmission application does include some information on MN DOT plans between Pine Island and Oronoco[4], including planned creation of a frontage road, but does not include the Spring 2026 plan above, closing medians and eliminating access that directly affects the area of the transmission project. Closing these median crossing, particularly on 500th, directly east of the "North Rochester" substation and along the CapX 2020 route on the south

[3] Online at talk.dot.state.mn.us/hwy-52-pine-island-oronoco/news_feed/spring-2026
[4] Skyway Application, Section 6.10.2, Table 6.10-1, p. 115-116.

side of 500th, may affect construction activity for the not only the Skyway transmission project but the 2nd circuit on the CapX 2020 line and the 765 kV projects as well.[5]

In short, all these dockets, these four projects, are electrically connected, and appear to be working together with joint "need," they're reliant on each of them for the larger plan to work. Each of these projects has aspects that affect the others and each interconnected aspect should be included in environmental review as the interdependent phased and connected actions that they are. Once more with feeling, in transmission, "It's all connected!"

Thank you for the opportunity to file this Comment. I'll follow with others going forward, individually and/or on behalf of clients.

Very truly yours,

Carol A. Overland
Attorney at Law

cc: eFiled and eServed

[5] See Skyway Application, p. 115-116, Chapter 6, Table 6.10-1 Curent and Reasonably Foreseeable Future Actions.