



414 Nicollet Mall
Minneapolis, MN 55401

October 2, 2026

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

Re: Applicants' Response to Hearing Comments and Proposed Findings of Fact, Conclusions of Law, and Recommendation

In the Matter of the Application of Xcel Energy and Echo Zone LLC for a Route Permit for the North Rochester to Skyway High Voltage Transmission Line Project in Goodhue County, Minnesota

MPUC Docket No. E002/TL-26-135

CAH Docket No. 24-2500-42002

Dear Ms. Bergman:

Northern States Power Company, doing business as Xcel Energy (Xcel Energy or the Company), and Echo Zone LLC, a subsidiary of Google LLC (collectively, the Applicants) respectfully submit these comments in response to the oral comments submitted at the September 14 and 15, 2026 public hearings and the written comments submitted during the public comment period ending on September 25, 2026. With these comments, the Applicants also provide Proposed Findings of Fact, Conclusions of Law, and Recommendation for the convenience of the Minnesota Public Utilities Commission (Commission) in reviewing the North Rochester to Skyway 345 kV Transmission Line Project (Project).

The proposed Project is needed to provide electric service to a proposed Google data center (the Data Center Campus) in the City of Pine Island. The proposed Project consists of a new, approximately 1.2-mile-long, double-circuit, 345/345 kV transmission line that will connect Xcel Energy's existing North Rochester Substation to new substation facilities at the Data Center Campus. The Project also includes expansion of Xcel Energy's existing North Rochester Substation and construction of

four smaller substation facilities within the Data Center Campus (Project Skyway Substations).

The Applicants appreciate the participation of state agencies, local governments, Tribal Nations, landowners, and members of the public throughout the Project's route permitting process. Public hearings were held in Pine Island on September 14, 2026 and virtually on September 15, 2026. During those hearings, the Applicants responded to a number of questions regarding the Project. The Applicants submit this letter to respond to written comments received before and after the public hearings and to provide supplemental information regarding certain topics discussed during the public hearings.

A. Oral Comments at Public Hearings

During the public hearing on September 14, 2026, one commenter asked about the proposed expansion of the North Rochester Substation.¹ While the Applicants provided information about that proposed expansion during the public hearing, additional information is provided in Section 2.3 of the Route Permit Application (Application).²

One commenter had questions about the need for two 765 kV transmission lines that are proposed to interconnect at the North Rochester Substation and how the costs for these projects are being allocated to Minnesota customers.³ These 765 kV transmission lines are not part of the proposed Project and the Applicants urge this commenter to sign up for the mailing lists for those proposed projects to learn more about the need for those projects and any upcoming public meetings/hearings.⁴

¹ September 14, 2026, Pine Island Public Hearing Transcript at 20:12-24:21 and 37:25-54:10 (Sept. 28, 2026) (eDocket No. 20269-236827-01).

² Route Permit Application at 21-22 (April, 28, 2026) (eDocket No. [20264-231087-02](#)) (Application).

³ Comment by Rodney Lanners (Sept. 20, 2026) (eDocket No. [20269-236626-01](#)).

⁴ See *In the Matter of the Application for a Certificate of Need for the PowerOn Midwest 765 kV and 345 kV High Voltage Transmission Line Project*, Docket No. E002, ET2, E015, ET6675/CN-25-117, <https://puc.eip.mn.gov/web/project/25117>; *In the Matter of the Application for a Certificate of Need for the Gopher to Badger Line 765 kV High Voltage Transmission Line Project*, Docket No. ET3, E002/CN-25-121, <https://puc.eip.mn.gov/web/project/25121>.

B. Written Comments

1. Vegetation Management Planning Working Group

The interagency Vegetation Management Planning Working Group (VMPWG) submitted comments on September 25, 2026 regarding the Project's Vegetation Management Plan (VMP) included as Appendix F to the Application filed on April 28, 2026.⁵ The Applicants appreciate VMPWG review of the draft VMP and will work with the VMPWG to address their proposed revisions as part of finalizing the Project's VMP prior to construction of the Project.

2. Public Comments

During the written public comment period, eight members of the public submitted written comments regarding the Project.

A couple commenters questioned the number of data center buildings being planned for the Data Center Campus and whether the proposed Project is appropriately sized for the planned development.⁶ As stated in the Applicants' September 3, 2026 letter, the Data Center Campus includes up to four data center buildings, an office building, a secure entrance, accessory structures, vehicular access drives, parking areas, stormwater infrastructure, and associated utility infrastructure improvements.⁷ Google currently plans to build one data center building initially, with plans to build up to three additional data center buildings in the future. The proposed Project has been sized to accommodate the buildout of a four-building Data Center Campus. Constructing utility infrastructure to serve the planned buildout of a development, rather than incrementally expanding facilities as additional phases are constructed, is prudent utility practice. This approach helps ensure reliable service, avoids repeated construction and associated impacts, and reduces the overall cost and disruption that would result from multiple rounds of infrastructure upgrades.

One commenter expressed concern about potential agricultural impacts during construction of the Project and perceived lack of specificity in portions of the draft

⁵ Vegetation Management Planning Working Group Hearing Comment Letter (Sept. 25, 2026) (eDocket No. [20269-236787-01](#)).

⁶ Comment by David Derksen (Sept. 24, 2026) (eDocket No. [20269-236787-01](#)); Comment by Aubree Derksen (Sept. 14, 2026) (eDocket No. [20269-236364-01](#)).

⁷ Response to Questions from August 6, 2026 Commission Meeting (Sept. 3, 2026) (eDocket No. [20269-236108-01](#)).

Agricultural Impact Mitigation Plan⁸ (AIMP).⁹ The Applicants are committed to working directly with affected landowners throughout final design, construction, and restoration of the Project to identify and address property-specific concerns. The AIMP establishes a framework for minimizing and mitigating impacts to agricultural operations while recognizing that individual properties may require different approaches or measures. As a result, some flexibility is necessary to ensure that mitigation measures can be tailored to the circumstances of individual landowners and agricultural operations. It is also important to note that the Draft Route Permit contains a number of specific conditions intended to minimize impacts to agricultural resources. These conditions include requiring the Applicants to implement measures to minimize erosion and sedimentation and to restore all areas disturbed during construction to pre-construction conditions.¹⁰ The Applicants are also required to restore and compensate landowners for damages to drain tiles, crops, and fences that occur as a result of construction of the Project.¹¹ During construction, there will also be a third-party monitor who will oversee construction activities in agricultural areas, work with affected landowners, and help ensure compliance with applicable permit conditions.

Several commenters questioned the Applicants' proposed modifications to two of the Draft Route Permit's conditions.¹² With respect to Special Condition 6.1, commenters expressed concern regarding the Applicants' proposal to revise the condition requiring all approvals necessary for construction of the Project Skyway Data Center Campus to be obtained before construction of the Project may begin. The Applicants proposed revising the condition to clarify that only the approvals necessary to construct at least one data center building must be obtained before construction of the Project can commence. This proposed revision is needed because the Data Center Campus will be permitted and constructed in phases.¹³ The revised condition continues to ensure that necessary approvals for at least one data center building are obtained before construction of the Project begins.

Commenters also questioned the Applicants' proposed modification to Special Condition 6.2, which generally prohibits tree removal between June 1 and August 15.

⁸ Application at Appendix G.

⁹ Comment by Aubree Derksen (Sept. 20, 2026) (eDocket No. [20269-236616-01](#)).

¹⁰ ORDER at Draft Route Permit Section 5.3.8 (Aug. 14, 2026) (eDocket No. [20268-235391-01](#)).

¹¹ ORDER at Draft Route Permit Section 5.3.17 and 5.3.21 (Aug. 14, 2026) (eDocket No. [20268-235391-01](#)).

¹² Comment by Aubree Derksen (Sept. 14, 2026) (eDocket No. [20269-236364-01](#)); Comment by Maranda Oeltjen (Sept. 15, 2026) (eDocket No. [20269-236436-01](#)); Comment by Trevor Scrabeck (Sept. 17, 2026) (eDocket No. [20269-236549-01](#)).

¹³ Applicants' Proposed Modifications to Draft Route Permit at 1 (Sept. 3, 2026) (eDocket No. [20269-236109-01](#)).

The Applicants proposed adding the phrase “to the extent practicable” to this condition.¹⁴ The Applicants remain committed to conducting tree clearing outside of this restricted period whenever feasible. However, limited circumstances may arise where tree clearing during this timeframe is necessary due to construction scheduling requirements, transmission system outage constraints, or other unforeseen Project circumstances. If tree removal is needed during the June 1 to August 15 timeframe, the Applicants would follow U.S. Fish and Wildlife Service guidelines on bird and bat impact avoidance. The Applicants continue to support these two proposed revisions to the Draft Route Permit.

C. Conclusion

The Applicants appreciate the opportunity to provide these comments in response to the comments received related to the proposed Project. We have electronically filed this document with the Commission. Copies are also being served on persons on the attached service list. Please contact Ellen Heine at ellen.l.heine@xcelenergy.com and Allen Gleckner at legal-notices@google.com if you have any questions regarding this filing.

Sincerely,

/s/ Ellen Heine

ELLEN HEINE
PRINCIPAL SITING AND PERMITTING AGENT
NORTHERN STATES POWER COMPANY

/s/ Allen Gleckner

ALLEN GLECKNER
ENERGY MARKET DEVELOPMENT
GOOGLE LLC

cc: Service List

¹⁴ Applicants’ Proposed Modifications to Draft Route Permit at 1 (Sept. 3, 2026) (eDocket No. [20269-236109-01](#)).

MPUC Docket No. E002/TL-26-135
CAH Docket No. 24-2500-42002

**STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE APPLICATION FOR A
ROUTE PERMIT FOR THE NORTH ROCHESTER
TO SKYWAY HIGH VOLTAGE TRANSMISSION
LINE PROJECT

**APPLICANTS' PROPOSED
FINDINGS OF FACT,
CONCLUSIONS OF LAW,
AND RECOMMENDATIONS**

**STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE APPLICATION FOR A
ROUTE PERMIT FOR THE NORTH
ROCHESTER TO SKYWAY HIGH VOLTAGE
TRANSMISSION LINE PROJECT

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**STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE
APPLICATION FOR A ROUTE PERMIT
FOR THE NORTH ROCHESTER TO
SKYWAY HIGH VOLTAGE
TRANSMISSION LINE PROJECT

**APPLICANTS' PROPOSED
FINDINGS OF FACT,
CONCLUSIONS OF LAW,
AND RECOMMENDATIONS**

Pursuant to Minn. Stat. § 216I.07, Northern States Power Company, doing business as Xcel Energy (Xcel Energy) and Echo Zone LLC, a subsidiary of Google LLC (Google) (collectively, the Applicants) submitted a Route Permit Application and Environmental Assessment (Application) on April 28, 2026 for a new, approximately 1.2-mile, double-circuit 345/345 kilovolt (kV) transmission line that will connect Xcel Energy's existing North Rochester Substation to new substation facilities at the Project Skyway Data Center development (the Data Center Campus) in Goodhue County, north of the City of Pine Island (the Project). The Project also includes expansion of Xcel Energy's existing North Rochester Substation and construction of four smaller substation facilities within the Data Center Campus (Project Skyway Substations) that will be owned by Google. The Project is needed to provide electric service to the Data Center Campus and includes up to four data center buildings, an office building, and other supporting infrastructure.

Public hearings were held before Administrative Law Judge (ALJ) Kristien R. E. Butler on September 14 and 15, 2026 in the above-captioned matter. An in-person public hearing was held on September 14, 2026 at the Pine Island American Legion, 108 First Avenue Southeast, Pine Island, Minnesota 55963 starting at 6:00 p.m. On September 15, 2026, a virtual public hearing was held via conference call and WebEx starting at 6:00 p.m. Written public comments were received until September 25, 2026.

The following appearances were made:

Valerie T. Herring, Taft Stettinius & Hollister, LLP, Lauren Steinhäuser, Assistant General Counsel, and Ellen Heine, Principal Siting and Land Rights Agent, appeared on behalf of Xcel Energy.

Christina K. Brusven and Shantal M. Pai, Fredrikson & Byron P.A., appeared on behalf of Google.

Sam Weaver appeared on behalf of the Minnesota Public Utilities Commission (Commission) staff. Saarah Maxon appeared on behalf of Commission Energy Infrastructure Permitting (PUC-EIP) staff.

STATEMENT OF ISSUES

Have the Applicants satisfied the criteria established in Minn. Stat. Ch. 216I for a route permit for the Project?

SUMMARY OF RECOMMENDATIONS

The Applicants have satisfied the applicable legal requirements and, accordingly, the Minnesota Public Utilities Commission GRANTS a Route Permit for the Project, subject to the conditions discussed below.

Based on the evidence in the hearing record, the Commission makes the following:

FINDINGS OF FACT

I. APPLICANTS AND PROJECT OWNERSHIP

1. Northern States Power Company, doing business as Xcel Energy, is a Minnesota corporation headquartered in Minneapolis, Minnesota, that is engaged in the business of generating, transmitting, distributing, and selling electric power and energy and related services in the states of Minnesota, North Dakota, and South Dakota.¹ In Minnesota, Xcel Energy provides electric service to 1.5 million customers.² Xcel Energy is a wholly owned utility operating company subsidiary of Xcel Energy Inc. and operates its transmission and generation system as a single integrated system with its sister company, Northern States Power Company, a Wisconsin corporation, known together as the NSP Companies.³ The NSP Companies are vertically integrated, transmission-owning members of Midcontinent Independent System Operator, Inc. (MISO).⁴ The NSP Companies have over 46,000 conductor miles of transmission lines and approximately 550 transmission and distribution substations.⁵

2. Google is an American technology corporation focused on information technology, online advertising, search engine technology, email, cloud computing, software, quantum computing, e-commerce, consumer electronics, and artificial intelligence. Google will be the first tenant in the Data Center Campus that is being

¹ Route Permit Application and Appendices A-G at 4 (April, 28, 2026) (eDocket No. [20264-231087-02](#)) (Application).

² Application at 4.

³ Application at 4.

⁴ Application at 4.

⁵ Application at 4.

developed by Ryan Companies, US (Ryan Companies). Google has committed to development of one initial data center building and supporting infrastructure but has plans for up to three additional data center buildings on the Data Center Campus.⁶

3. The Project will be jointly owned by Xcel Energy and Google.⁷ Xcel Energy proposes to construct, own, and operate the approximately 1.2-mile-long, double-circuit, 345/345 kV transmission line, the existing North Rochester Substation, and the planned expansion of the North Rochester Substation.⁸ Google will construct, own, and operate the four Project Skyway Substations.⁹

II. PROCEDURAL HISTORY

4. As required by Minn. Stat. § 216I.05, subd. 6, the Applicants provided a draft of the Application to PUC-EIP staff for review on February 28, 2026.¹⁰

5. On April 28, 2026, the Applicants filed the Route Permit Application.¹¹ The Applicants stated that they intend to proceed under the Standard Review Process pursuant to Minn. Stat. § 216I.07.¹²

6. On May 12, 2026, the Commission accepted the Application as sufficiently complete to proceed with the public information meeting in accordance with Minn. Stat. § 216I.05.¹³ The Commission requested that the Applicants make a supplemental filing no later than the public meeting, that includes documentation of the follow-up phone calls with the Tribal Historic Preservation Offices from the tribes that have not responded to previous emails.¹⁴

7. On June 2, 2026, the Commission issued a Notice of Complete Route Permit Application and Public Information Meetings. This notice set in-person and virtual public information and scoping meetings on the Project for June 15 and June 16, respectively and set a written comment deadline of June 26, 2026.¹⁵

8. On June 5, 2026, the Applicants filed a Tribal Correspondence Filing as required by the Commission's Application completeness determination documenting that on June 2 and 3, 2026, the Applicants called the 10 tribes that had not responded to the Applicants initial outreach letters or follow-up emails.¹⁶

⁶ Response to Questions from August 6, 2026 Commission Meeting at 4 (Sept. 3, 2026) (eDocket No. [20269-236108-01](#)).

⁷ Application at 4.

⁸ Application at 4.

⁹ Application at 4.

¹⁰ Application at 7 and Appendix D.

¹¹ See Application.

¹² Application at 6-7.

¹³ Application Completeness Determination (May 12, 2026) (eDocket No. [20265-231699-01](#)).

¹⁴ *Id.*

¹⁵ Notice of Complete Route Permit Application and Public Information Meeting (June 2, 2026) (eDocket No. [20266-232380-01](#)).

¹⁶ Tribal Correspondence Compliance Filing (June 5, 2026) (eDocket No. [20266-232595-01](#)).

9. On June 8, 2026, Carol Overland filed a comment regarding the public meeting location.¹⁷

10. On June 10, 2026, Notice of Complete Route Permit Application and Public Information Meetings was published in the Zumbrota News Record.¹⁸

11. On June 11, 2026, the Goodhue Soil and Water Conservation District filed comments on the Project.¹⁹

12. On June 15, 2026, the Commission held an in-person public information and scoping meeting at the Goodhue County Fairgrounds 4H Building in Zumbrota, Minnesota.²⁰ Eight members of the public made oral comments at the public meeting.²¹

13. On June 16, 2026, the Commission held a virtual public information and scoping meeting via WebEx.²² Two members of the public made oral comments at the public meeting.²³

14. On June 25, 2026, the Minnesota Department of Transportation (MnDOT) filed comments on the Project.²⁴

15. On June 26, 2026, the Minnesota Department of Natural Resources (MnDNR) filed a comment on the Project.²⁵

16. On June 29, 2026, the PUC-EIP unit filed written public comments that included public comments from four members of the public.²⁶

17. On July 2, 2026, the PUC-EIP issued a Sample Transmission Line Permit.²⁷

18. On July 14, 2026, the Applicants filed a response to comments submitted prior to the June 26, 2026 deadline.²⁸ This letter included a response to the comments

¹⁷ Comment by Carol Overland on Meeting Location (June 8, 2026) (eDocket No. [20266-232599-01](#)).

¹⁸ Affidavit of Publication – Newspaper Notice of Complete Route Permit Application and Public Information Meetings (July 7, 2026) (eDocket No. [20267-233843-01](#)).

¹⁹ Goodhue Soil and Water Conservation District Comments (June 11, 2026) (eDocket No. [20266-232779-01](#)).

²⁰ Notice of Complete Route Permit Application and Public Information Meeting (June 2, 2026) (eDocket No. [20266-232380-01](#)).

²¹ Oral Comments from Public Information and Scoping Meeting at Zumbrota Public Meeting (June 29, 2026) (eDocket No. [20266-233459-02](#)).

²² Notice of Complete Route Permit Application and Public Information Meeting (June 2, 2026) (eDocket No. [20266-232380-01](#)).

²³ Oral Comments from Public Information and Scoping Meetings at Virtual Public Meeting (June 29, 2026) (eDocket No. [20266-233459-02](#)).

²⁴ Minnesota Department of Transportation – Comments (June 25, 2026) (eDocket No. [20266-233304-01](#)).

²⁵ Minnesota Department of Natural Resources – Comment (June 26, 2026) (eDocket No. [20266-233417-01](#)).

²⁶ Written Public Comments Received (June 29, 2026) (eDocket No. [20266-233459-01](#)).

²⁷ Sample HVTL Permit (July 2, 2026) (eDocket No. [20267-233731-01](#)).

²⁸ Response to Scoping Comments (July 14, 2026) (eDocket No. [20267-234131-01](#)).

from the Goodhue Soil and Water Conservation District, MnDOT, MnDNR, and public comments.

19. On August 14, 2026, the Commission issued an Order finding that an EA addendum is not required for the Project, an extension to the six-month statutory deadline is not necessary, issuing a Draft Route Permit prepared by PUC-EIP, and requesting an ALJ conduct public hearings for the Project and prepare a summary of public testimony.²⁹

20. On August 24, 2026, the ALJ issued an order for prehearing conference to occur on August 26, 2026.³⁰

21. On August 26, 2026, the first prehearing conference was held and the ALJ issued a Prehearing Order that same day setting public hearings for September 14 and 15, 2026.³¹

22. On August 31, 2026, the Commission issued a Notice of Public Hearings and Availability of Draft Permit.³² The Notice set in-person and virtual public hearings for September 14 and 15, 2026, respectively, and set the deadline for receipt of written comments for September 25, 2026.

23. On September 3, 2026, the Applicants filed proposed modifications to the Draft Route Permit³³ and a Response to Questions from the August 6, 2026 Commission Meeting.³⁴

24. On September 8, 2026, a Notice of Public Hearings and Availability of Draft Permit was published in the Zumbrota News Record.³⁵

25. On September 14, 2026, an in-person public hearing was held at 6:00 p.m. at the Pine Island American Legion in Pine Island, Minnesota.³⁶ Three members of the public provided oral comments.³⁷

26. On September 15, 2026, a virtual public hearing was held at 6:00 p.m. via WebEx.³⁸ One member of the public provided oral comments.³⁹

²⁹ ORDER (Aug. 14, 2026) (eDocket No. [20268-235391-01](#)).

³⁰ ORDER FOR PREHEARING CONFERENCE (August 24, 2026) (eDocket No. [20268-235726-01](#)).

³¹ PREHEARING ORDER (August 26, 2026) (eDocket No. [20268-235813-01](#)).

³² Notice of Public Hearings and Availability of Draft Permit (August 31, 2026) (eDocket No. [20268-235904-01](#)).

³³ Applicants' Proposed Modifications to Draft Route Permit (Sept. 3, 2026) (eDocket No. [20269-236109-01](#)).

³⁴ Response to Questions from August 6, 2026 Commission Meeting (Sept. 3, 2026) (eDocket No. [20269-236108-01](#)).

³⁵ Affidavit of Publication and Newspaper Notice (Sept. 11, 2026) (eDocket No. [20269-236318-01](#)).

³⁶ PREHEARING ORDER (August 26, 2026) (eDocket No. [20268-235813-01](#)).

³⁷ Pine Island Public Hearing Transcript at 20:12-37:17 (Sept. 14, 2026).

³⁸ PREHEARING ORDER (August 26, 2026) (eDocket No. [20268-235813-01](#)).

³⁹ Virtual Public Hearing Transcript at 24:18- 36:12 (Sept. 15, 2026).

27. From September 17 to September 25, 2026, eight members of the public submitted written comments.⁴⁰

28. On September 25, 2026, the Minnesota Interagency Vegetation Management Planning Working Group (VMPWG) filed comments recommending the Applicants continue to coordinate with the VMPWG as the vegetation management plan is finalized.⁴¹

29. On September 25, 2026, the public comment period closed.

30. On October 2, 2026, the Applicants submitted their Response to Public Comments and Proposed Findings of Fact, Conclusions of Law, and Recommendations.

III. DESCRIPTION OF THE PROJECT

31. The Project consists of a new, approximately 1.2-mile-long, double-circuit, 345/345 kV transmission line that will connect Xcel Energy's existing North Rochester Substation to the four new Project Skyway Substations.⁴²

32. The Project also includes expansion of Xcel Energy's existing North Rochester Substation. Expansion of the existing North Rochester Substation site is needed to accommodate the termination of two existing lines that currently terminate at the existing North Rochester Substation. These lines need to be moved to the expanded North Rochester Substation to accommodate the termination of the Project's new 345/345 double-circuit transmission line. The existing North Rochester Substation occupies approximately 10 acres, which includes five breaker-and-a-half rows with capacity to accommodate up to eight 345 kV line terminations and two transformers. Xcel Energy proposes to expand the substation footprint directly to the north by approximately 11.3 acres (North Rochester Substation Expansion Area), increasing the total site area to approximately 22 acres. The North Rochester Substation Expansion Area will be graveled and fenced and will add six new breaker-and-a-half rows, providing capacity for 10 additional line terminations. A second Electrical Equipment Enclosure (EEE) building will be constructed within the expanded footprint to support the new line terminations and associated protection and relaying equipment.⁴³

⁴⁰ Comment by Trevor Scrabeck (Sept. 17, 2026) (eDocket No. [20269-236549-01](#)); Comment by Rodney Lanners (Sept. 20, 2026) (eDocket No. [20269-236626-01](#)); Comment by Aubree Derksen (Sept. 20, 2026) (eDocket No. [20269-236616-01](#)); Comment by David Derksen (Sept. 24, 2026) (eDocket No. [20269-236787-01](#)); Comment by Ginger Fride (Sept. 25, 2026) (eDocket No. [20269-236842-01](#)); Comment by Elizabeth Dunens (Sept. 28, 2026) (eDocket No. [20269-236825-01](#)).

⁴¹ Vegetation Management Planning Working Group Comment Letter (Sept. 25, 2026) (eDocket No. [20269-236787-01](#)).

⁴² Application at 11.

⁴³ Application at 21.

33. The Project will include construction of the four Project Skyway Substations. The Project Skyway Substations will range in size from approximately 230 to 250 feet wide and 175 to 285 feet in length. In total, the Project Skyway Substations will have a 5.8-acre footprint. The final locations of the Project Skyway Substations will depend on the final Project's route and further coordination with Data Center Campus development. The Project Skyway Substations will consist of A-frame structures for 345 kV high voltage transmission and terminations, protection equipment, bus schemes, switches, breakers, controls, and transformers to output medium voltage to the industrial campus. The A-frame structures will be approximately 77 feet in height with primary bus work below measuring approximately 25 feet in height.⁴⁴

IV. NEED OVERVIEW

34. The Project is needed to provide electric service to the Data Center Campus.⁴⁵ Xcel Energy has submitted a petition in a separate docket (Docket No. E002/M-26-170) requesting Commission approval of an Electric Service Agreement and an Interconnection Agreement for Retail Electric Service at Transmission Voltage.

35. Because the Project is proposed primarily to serve the demand of a single customer at a single location, a Certificate of Need is not required for the Project pursuant to Minn. Stat. § 216B.243, subd. 8(2).⁴⁶ However, because the 345/345 double-circuit kV line is greater than 1,500 feet in length, a Route Permit from the Commission is required pursuant to Minn. Stat. § 216I.05, subd. 2.⁴⁷

V. ROUTES EVALUATED

36. The Applicants' proposed route for the 345/345 kV transmission line begins at Xcel Energy's North Rochester Substation west of U.S. Highway 52 (US 52) and travels east for approximately 0.64 miles, crossing US 52, then turns south for approximately 0.52 miles, where the route ends at the southernmost of the four proposed Project Skyway Substations (Proposed Route).⁴⁸

37. Minn. Stat. § 216I.05, subd. 3(b)(14), requires an applicant to identify any alternative routes that were considered and rejected for the Project.

38. Applicants did not consider any alternative transmission line routes for the Project.⁴⁹ The Proposed Route is the most direct and least impactful route between North Rochester Substation and the Data Center Campus.

⁴⁴ Application at 23.

⁴⁵ Application at 5.

⁴⁶ Application at 6.

⁴⁷ Application at 6.

⁴⁸ Application at 1; ORDER at Draft Route Permit Section 3 (Aug. 14, 2026) (eDocket No. [20268-235391-01](#)).

⁴⁹ Application at 6.

VI. TRANSMISSION LINE STRUCTURE TYPES AND SPANS

39. The Applicants propose to primarily use double-circuit, custom steel, self-supporting structures with a vertical phase configuration. Other structure types that may be used for the Project include double-circuit and double-pole terminal dead-ends, double-circuit and single-pole tangent and/or angle structures with V-string insulators, and single-circuit and single-pole terminal dead-ends.⁵⁰

40. The Applicants will install the new structures on reinforced concrete drilled pier foundations. Typical foundations will range from 8 to 10 feet in diameter. Structure heights will range from 100 to 180 feet above ground.⁵¹

41. Span lengths between the structures will vary from 150 to 975 feet.⁵²

VII. TRANSMISSION LINE CONDUCTORS

42. The double-circuit, 345/345 kV transmission line will have six phase wires and two shield wires per structure. The phase wires will use 3-phase double-bundled twisted 636 kcmil 26/7 Aluminum Conductor Steel Reinforced (ACSR) “Grosbeak” conductors.⁵³

43. The shield wires will be 0.555-inch diameter 48-fiber optical ground wire. The structure spans into the North Rochester Substation and Project Skyway Substations will have two additional 3/8-inch Extra High Strength (EHS) steel shield wires.⁵⁴

VIII. TRANSMISSION LINE ROUTE WIDTHS

44. Under the Energy Infrastructure Permitting Act, Minn. Stat. Ch. 216I, a “route” may have “a variable width of up to 1.25 miles,” within which the right-of-way for transmission facilities can be located.

45. The Applicants request a proposed route width of 1,000 feet (500 feet on either side of the transmission line centerline) for the transmission line portions of the Project.⁵⁵

46. An expanded route width is proposed around the North Rochester Substation, the North Rochester Substation Expansion Area, and the Project Skyway Substations.⁵⁶

⁵⁰ Application at 16.

⁵¹ Application at 16.

⁵² Application at 16.

⁵³ Application at 16.

⁵⁴ Application at 16.

⁵⁵ Application at 12.

⁵⁶ Application at 12.

47. The requested route width provides the Applicants with flexibility to address design and engineering issues after the Route Permit is issued.⁵⁷

IX. TRANSMISSION LINE RIGHT-OF-WAY

48. The double-circuit, 345/345 kV transmission line requires a 150-foot-wide right-of-way.⁵⁸

X. PROJECT SCHEDULE

49. The Applicants anticipate that construction of the Project will start in May 2027 and that the Project will be placed in service in December 2029.⁵⁹

XI. PROJECT COSTS

50. Estimated costs to construct the Project are anticipated to be between \$198 million and \$248 million.⁶⁰

51. The construction costs for the Project will be paid for by Google.⁶¹

52. Table 1 below provides the current estimated costs to construct the Project.⁶² Costs may vary depending upon, among other things, the cost of materials and labor.⁶³

Table 1. Estimated Project Costs

Project Components	Low Capital Expenditures	High Capital Expenditures
Transmission Line (double-circuit, 345/345 kV transmission line)	\$8,000,000	\$10,000,000
Existing North Rochester Substation Modifications	\$12,000,000	\$16,000,000
North Rochester Substation Expansion	\$58,000,000	\$62,000,000
Project Skyway Substations (4)	\$120,000,000	\$160,000,000
Total Project Costs⁶⁴	\$198,000,000	\$248,000,000

⁵⁷ Application at 12.

⁵⁸ Application at 14.

⁵⁹ Application at 25.

⁶⁰ Application at 25.

⁶¹ Application at 25.

⁶² Application at 25.

⁶³ Application at 25.

⁶⁴ There may be differences between the sum of the individual component amounts and total project costs due to rounding.

XII. PERMITTEES

53. The permittees for the Project are Xcel Energy and Echo Zone LLC.⁶⁵

54. Xcel Energy will construct, own, and operate the approximately 1.2-mile-long, double-circuit, 345 kV transmission line and planned expansion of the North Rochester Substation.⁶⁶ Xcel Energy currently owns and operates the existing North Rochester Substation.⁶⁷

55. Google will construct, own, and operate four Project Skyway Substations.⁶⁸

XIII. TRIBAL NATION, FEDERAL AND STATE AGENCIES, AND LOCAL GOVERNMENT PARTICIPATION

56. Minn. Stat. § 216I.05, subd. 5 requires applicants to provide notice to each local unit of government within the proposed route, Minnesota Tribal governments, and state technical resource agencies 30 days prior to filing a route permit application.

57. In November and December 2025, the Applicants provided Project notification letters to Tribal Nations, federal agencies, state agencies, and local governments.⁶⁹

A. Tribal Nations

58. On November 6, 2025, the Applicants sent initial outreach letters to federally recognized Tribes in Minnesota and Tribes that may have an ancestral interest in the Minnesota county crossed by the Project.⁷⁰

59. On the same day, a representative from the Shakopee Mdewakanton Sioux contacted the Applicants and noted they have no concerns about the proposed Project.⁷¹

60. On November 19, 2025, the Shakopee Mdewakanton Sioux again informed the Applicants that they had no concerns with the proposed Project but requested an update to their address.⁷²

61. On December 8, 2025, the Tribal Historic Preservation Officer (THPO) of the Leech Lake Band of Ojibwe confirmed that the Leech Lake Band of Ojibwe

⁶⁵ Application at 4.

⁶⁶ Application at 4.

⁶⁷ Application at 4.

⁶⁸ Application at 4.

⁶⁹ Application at 119-124.

⁷⁰ Application at 119.

⁷¹ Application at 120.

⁷² Application at 120.

does not have any recorded historic properties within the area. The THPO also noted that “should any human remains or suspected human remains be encountered, all work shall cease and the following personnel should be notified immediately: County Sheriff’s Office, Office of the State Archaeologist, and the Leech Lake Band of Ojibwe along with other interested parties.”⁷³

62. Xcel Energy has regular quarterly meetings with the Prairie Island Indian Community (PIIC) Tribal Council and Project status updates were provided at the January and April 2026 quarterly meetings. In addition, a meeting was held in mid-April 2026 with representatives from PIIC, Xcel Energy, Ryan Companies, and Google as an introduction to the Project team.⁷⁴

63. On April 21, 2026, the Applicants also sent follow up emails to the eight Minnesota Tribes who had not responded to the initial outreach.⁷⁵ The emails noted that the Applicants planned to file the Application, offered to meet to discuss the Project and provide additional detail, and requested confirmation of receipt.⁷⁶

64. On June 2 and 3, 2026, the Applicants called the 10 tribes that had not responded to the Applicants’ initial outreach letters or follow-up emails.⁷⁷

B. Federal Agencies

65. On November 6, 2025, the Applicants sent initial outreach letters to the following federal agencies: the U.S. Army Corps of Engineers (USACE), U.S. Fish and Wildlife Service (USFWS), Federal Aviation Administration (FAA), U.S. Department of Agriculture (USDA), U.S. Bureau of Indian Affairs (USBIA), and the U.S. Environmental Protection Agency (USEPA).⁷⁸

66. The USACE responded to the Project notification letter on November 7, 2025 and noted that the Applicants should submit a permit application that identifies potential impacts of the Project. The Applicants responded to the USACE and noted they will continue coordinating with the USACE as needed for the Project.⁷⁹

67. The USFWS responded to the Project notification letter on November 13, 2025, noting that the migratory bird program had no feedback other than for the Applicants to follow the federal guidance for transmission lines and to reach out if there are any eagle nests or eagle-related issues. On December 1, 2025, USFWS noted that

⁷³ Application at 120.

⁷⁴ Application at 121.

⁷⁵ Application at 121.

⁷⁶ Application at 121.

⁷⁷ Tribal Correspondence Compliance Filing (June 5, 2026) (eDocket No. [20266-232595-01](#)).

⁷⁸ Application at 121.

⁷⁹ Application at 121.

they see no other resource concerns but noted that an Information for Planning and Consultation (IPAc) should be filed to assist in the USFWS's environmental review.⁸⁰

68. The FAA responded to the Project notification letter on November 20, 2025, stating that the Applicants should file an Obstruction Evaluation/Airport Airspace Evaluation Analysis to get an official determination letter from the FAA.⁸¹

C. State Agencies

69. The Applicants sent initial outreach letters on November 6, 2025, to the following state agencies: Minnesota Association of Soil and Water Conservation, Minnesota Board of Water and Soil Resources, Minnesota Department of Agriculture, Minnesota Department of Health, MnDNR, MnDOT, Minnesota Pollution Control Agency (MPCA), and the Minnesota State Historic Preservation Office (SHPO).⁸²

70. The Applicants followed up with MnDOT on November 11, 2025, requesting information on whether a Project-specific Early Notification Memo form will be issued. On November 12, 2025, MnDOT requested a kick-off meeting and noted that they will supply a Project-specific Early Notification Memo. On November 13, 2025, MnDOT sent a formatted ENM form for the Applicants to use for requesting MnDOT review for use in the application.⁸³

71. On June 25, 2026, the MnDOT filed comments in response to the Commission's comment period.⁸⁴ MnDOT noted that in the stretch of US 52 that the Project area covers, MnDOT sponsors the Monarch Nationwide Candidate Conservation Agreement Adopted Areas and the area may also contain vegetation of concern. MnDOT further noted that roadway improvements may be planned for this segment of US 52 in the Project area. MnDOT's comments also included, as an attachment, the comments and recommendations from MnDOT's Office of Environmental Stewardship. Many of these comments relate to matters that would be addressed through MnDOT's permitting process or through other applicable federal and state permitting requirements.⁸⁵

72. The Minnesota SHPO responded to the Project notification letter on November 13, 2025, providing the contact information for the specific SHPO review for Commission-related projects and gave information on how to submit the Project for formal review. On November 14, 2025, the Applicants responded and indicated they would submit the Project for formal review at a later date. On December 8, 2025, SHPO noted that an archaeological literature review and survey assessment along with

⁸⁰ Application at 122.

⁸¹ Application at 122.

⁸² Application at 122.

⁸³ Application at 123.

⁸⁴ Minnesota Department of Transportation – Comments (June 25, 2026) (eDocket No. [20266-233304-01](#)).

⁸⁵ Minnesota Department of Transportation – Comments (June 25, 2026) (eDocket No. [20266-233304-01](#)).

a review of the Minnesota Statewide Historic Inventory Portal (MnSHIP) of the Project Area will help determine if the Project has the potential to affect archaeological sites.⁸⁶

73. On June 26, 2026, the MnDNR filed a comment letter in response to the Commission's comment period.⁸⁷ In its comments the MnDNR recommended that the Route Permit for the Project include conditions related to: (1) Project lighting; (2) vegetation clearing timing; (3) avian flight diverters; (4) wildlife-friendly erosion control; and (5) dust control. The MnDNR also noted that the Project may require a MnDNR Water Appropriation Permit.⁸⁸

74. On September 25, 2026, the VMPWG filed comments recommending the Applicants continue to coordinate with the VMPWG as the vegetation management plan is finalized. Overall, the VMPWG determined the vegetation management plan appeared achievable and included a range of potential seed mixes that can assist in restoration of the site and fulfil the draft permit requirement for the Applicants to develop a vegetation management plan.⁸⁹

D. Local Government Units

75. On November 6, 2025, the Applicants also sent Project notification letters to the following local government units: Goodhue County, City of Pine Island, Pine Island Township, and Goodhue Soil & Water Conservation District.⁹⁰

76. On November 7, 2025, a representative from the Goodhue Soil & Water Conservation District emailed their concerns regarding a wetland boundary that is near the proposed North Rochester Substation expansion area. Applicants responded and noted that a wetland delineation will be done in that area.⁹¹

77. On June 11, 2026, the Goodhue Soil and Water Conservation District also filed comments in response to the Commission's comment period.⁹² These comments noted the existence of a wetland within and to the east of the North Rochester Substation Expansion Area and requested that the Applicants comply with the Minnesota Wetland Conservation Act.⁹³

78. On November 13, 2025, a representative from Pine Island Township emailed their concerns about the North Rochester Substation expansion and the

⁸⁶ Application at 123.

⁸⁷ Minnesota Department of Natural Resources – Comment (June 26, 2026) (eDocket No. [20266-233417-01](#)).

⁸⁸ Minnesota Department of Natural Resources – Comment (June 26, 2026) (eDocket No. [20266-233417-01](#)).

⁸⁹ Vegetation Management Planning Working Group Comment Letter (Sept. 25, 2026) (eDocket No. [20269-236787-01](#)).

⁹⁰ Application at 123.

⁹¹ Application at 124.

⁹² Ben Dvorak Comments (June 11, 2026) (eDocket No. [20266-232779-01](#)).

⁹³ Ben Dvorak Comments (June 11, 2026) (eDocket No. [20266-232779-01](#)).

possible drainage problems that could impact the agricultural field to the west. The Applicants responded and requested a meeting to further discuss the concerns.⁹⁴

79. On December 1, 2025, a Goodhue County representative emailed their comments and questions regarding the Project. The Applicants responded that they were reviewing and preparing a response.⁹⁵

XIV. PUBLIC COMMENTS

80. Approximately ten written public comments were received from September 3, 2026 through September 28, 2026.

81. Four people provided oral comments at the two public hearings held on September 14 and 15, 2026.⁹⁶

82. Public comments are summarized in Attachment A.

XV. FACTORS FOR A ROUTE PERMIT

83. The Minnesota Energy Infrastructure Permitting Act provides that no person may construct a high-voltage transmission line without a route permit from the Commission.⁹⁷ A high-voltage transmission line is defined as “a conductor of electric energy and associated facilities that is (1) designed for and capable of operation at a nominal voltage of 100 kilovolts or more, and (2) is greater than 1,500 feet in length.”⁹⁸

84. The Project consists of a double-circuit, 345/345 kV transmission line that is 1.2 miles long, which is greater than 1,500 feet in length, and, therefore, a route permit is required from the Commission prior to construction.⁹⁹

85. The Minnesota Energy Infrastructure Permitting Act requires that route permit determinations must:

- (1) be guided by the state’s goals to conserve resources;
- (2) minimize environmental impacts, and minimize human settlement and other land use conflicts;
- (3) consider impacts to environmental justice areas, as defined in section 216B.1691, subdivision 1, paragraph (e), including cumulative impacts, as defined in section 116.065, to environmental justice areas; and
- (4) ensure the state’s energy

⁹⁴ Application at 124.

⁹⁵ Application at 123.

⁹⁶ September 14, 2026, Pine Island Public Hearing Transcript (Sept. 28, 2026) (eDocket No. 20269-236827-01); September 15, 2026, Virtual Public Hearing Transcript (Sept. 28, 2026) (eDocket No. 20269-236827-02).

⁹⁷ Minn. Stat. § 216I.05, subd. 2.

⁹⁸ Minn. Stat. § 216I.05, subd. 2.

⁹⁹ Application at 6.

security through efficient, cost-effective energy supply and infrastructure.¹⁰⁰

86. The Commission's determinations of whether to issue a route permit under the Minnesota Energy Infrastructure Permitting Act must include at minimum:

(1) evaluating research and investigations relating to: (i) large energy infrastructure facilities' effects on land, water, and air resources; and (ii) the effects water and air discharges and electric and magnetic fields resulting from large energy infrastructure facilities have on public health and welfare, vegetation, animals, materials, and aesthetic values, including baseline studies, predictive modeling, and evaluating new or improved methods to minimize adverse impacts of water and air discharges and other matters pertaining to large energy infrastructure facilities' effects on the water and air environment;

(2) conducting environmental evaluation of sites and routes that are proposed for future development and expansion, and the relationship of proposed sites and routes for future development and expansion to Minnesota's land, water, air, and human resources;

(3) evaluating the effects of measures designed to minimize adverse environmental effects;

(4) evaluating the potential for beneficial uses of waste energy from proposed large electric power generating plants;

(5) analyzing the direct and indirect economic impact of proposed sites and routes, including but not limited to productive agricultural land lost or impaired;

(6) evaluating adverse direct and indirect environmental effects that are unavoidable should the proposed site and route be accepted;

(7) evaluating alternatives to the applicant's proposed site or route, if applicable;

¹⁰⁰ Minn. Stat. § 216I.05, subd. 11(a).

- (8) when appropriate, evaluating potential routes that would use or parallel existing railroad and highway rights-of-way;
- (9) evaluating governmental survey lines and other natural division lines of agricultural land to minimize interference with agricultural operations;
- (10) evaluating the future needs for large energy infrastructure facilities in the same general area as any proposed site or route;
- (11) evaluating irreversible and irretrievable commitments of resources if the proposed site or route is approved;
- (12) when appropriate, considering the potential impacts raised by other state and federal agencies and local entities;
- (13) evaluating the benefits of the proposed facility with respect to (i) the protection and enhancement of environmental quality, and (ii) the reliability of state and regional energy supplies;
- (14) evaluating the proposed facility's impact on socioeconomic factors; and
- (15) evaluating the proposed facility's employment and economic impacts in the facility site's vicinity and throughout Minnesota, including the quantity, quality, and compensation level of construction and permanent jobs. The commission must consider a facility's local employment and economic impacts, and may reject or place conditions on a site or route permit based on the local employment and economic impacts.¹⁰¹

87. In addition, Minn. Stat. § 216I.05, subd. 11(e), provides that the Commission must make “a specific finding that the commission considered locating a route for a high-voltage transmission line on an existing high-voltage transmission route and using parallel existing highway right-of-way. To the extent an existing high-

¹⁰¹ Minn. Stat. § 216I.05, subd. 11(b).

voltage transmission route or parallel existing right-of-way is not used for the route, the commission must state the reasons.”¹⁰²

88. There is sufficient evidence in the record to assess the Project using the criteria and factors set forth above.

XVI. APPLICATION OF ROUTING CRITERIA TO THE PROPOSED ROUTE

A. Effects on Human Settlement

89. Minnesota law requires consideration of the effects the facility’s construction and operation has on human settlement, including but not limited to public health and safety, displacement, noise, aesthetics, socioeconomic impacts, environmental justice impacts, cultural values, recreation, and public services.¹⁰³

1. Displacement

90. For transmission lines, National Electric Safety Code (NESC) standards require certain clearances between transmission line structures and buildings or structures within the right-of-way for safe operation of the transmission line. Residences or other buildings located within the ROW that cannot be avoided are generally removed or displaced.¹⁰⁴

91. No residences, structures, or businesses will be displaced by the Project.¹⁰⁵

92. There are no residences within 300 feet of the transmission line’s proposed centerline and there are two residences within 301 to 500 feet. The two residences are under contract and will be acquired by Ryan Companies prior to the start of construction of the Project.¹⁰⁶

93. There are no residences within 500 feet of the North Rochester Substation site and the North Rochester Expansion Area and no residences within 500 feet of the Project Skyway Substations.¹⁰⁷

2. Noise

94. The Minnesota Pollution Control Agency (MPCA) has established standards for the regulation of noise levels in Minn. R. ch. 7030. Noise standards are based on noise area classifications (NAC) determined at the location of the person who

¹⁰² Minn. Stat. § 216I.05, subd. 11(e).

¹⁰³ Minn. Stat. § 216I.05, subd. 4(a)(2).

¹⁰⁴ Application at 42.

¹⁰⁵ Application at 42.

¹⁰⁶ Application at 38.

¹⁰⁷ Application at 38.

hears the noise. Residences are in the most restrictive NAC and are classified as NAC 1, business areas are classified as NAC 2, and industrial/agricultural areas are classified as NAC 3. A fourth area, NAC 4, is defined as undeveloped and unused land, but no noise standards apply to this land class. The noise standards specify the maximum allowable noise levels at a receptor and cannot be exceeded for more than 10 percent of an hour (L10) or 50 percent of an hour (L50). The most restrictive MPCA noise limits are 60–65 A-weighted decibels (dBA) during the daytime and 50–55 dBA during the nighttime.¹⁰⁸

95. Construction noise is expected to occur during daytime hours as the result of heavy equipment operation and increased vehicle traffic. Residents living near the construction of the Project could be temporarily affected by noise occurring during construction activities. Upon completion of construction activities, noise associated with construction equipment will cease.¹⁰⁹

96. Noise levels during operation and maintenance of the Project's transmission line will generally be minimal. Noise emissions from a transmission line occur during certain weather conditions. In foggy, damp, or rainy weather, power lines can create a crackling sound due to the small amount of electricity ionizing the moist air near the wires. During heavy rain, the background noise level of the rain is usually greater than the noise from the transmission line. As a result, people do not normally hear noise from a transmission line during heavy rain.¹¹⁰

97. Noise levels during operation and maintenance of the Project's substations will generally be minimal. Transformer or shunt reactor "hum" is the dominant noise source at substations if such equipment exists. At substations without transformers or shunt reactors, only infrequent noise sources would exist, such as the opening and closing of circuit breakers or the operation of an emergency generator. Typical substation design is such that noise produced by these sources does not reach beyond the substation property.¹¹¹

98. The Applicants will require construction activities to be generally limited to daytime hours between 7 a.m. and 7 p.m. on weekdays. The Applicants will work with applicable stakeholders in the event construction becomes necessary outside of these hours. Heavy equipment will also be used, as required by local ordinances, with sound attenuation devices, such as mufflers, to minimize the daytime noise levels.¹¹²

99. Section 5.3.6 of the Draft Route Permit requires compliance "with noise standards established under Minn. R. 7030.0010 to 7030.0080." The Draft Route

¹⁰⁸ Application at 56-57.

¹⁰⁹ Application at 58.

¹¹⁰ Application at 58.

¹¹¹ Application at 59.

¹¹² Application at 59.

Permit also requires the permittees to “limit construction and maintenance activities to daytime working hours to the extent practicable.”¹¹³ The Applicants will comply with Minnesota state noise standards and will limit maintenance activities to daytime working hours to the extent practicable.

3. Aesthetics

100. Aesthetics refers to the visual quality and character of an area as perceived by the viewer. A landscape’s character is largely influenced by topography, vegetation, water resources, existing development, and infrastructure.¹¹⁴

101. The Project’s impacts on aesthetics will range from minimal to moderate, and possibly higher depending on the viewer.¹¹⁵

102. The new Project transmission structures will range in height from 100 to 180 feet. The Project’s transmission line structures and conductors would create new aesthetic impacts but the new transmission line Project will parallel an existing 345 kV transmission line for 0.55 mile of its length, reducing potential aesthetic impacts.¹¹⁶ Paralleling existing rights-of-way and linear features minimizes the amount of tree and vegetation clearing required for construction and operation of the transmission line that would otherwise fragment the existing landscape.¹¹⁷ There are also no residences within 300 feet of the transmission line’s proposed alignment and two residences within 301 to 500 feet. These two residences are under contract and will be acquired by Ryan Companies prior to the start of construction of Project Skyway Data Center Campus.¹¹⁸

103. The expansion of the North Rochester Substation would have a minimal aesthetic impact due to the presence of the existing substation.¹¹⁹ Construction of the new Project Skyway Substations would have an aesthetic impact but would be located within the larger Data Center Campus. There are also no residences within 500 feet of the North Rochester Substation site and expansion area and no residences within 500 feet of the Project Skyway Substations.¹²⁰

104. The Draft Route Permit contains conditions related to aesthetics in Section 5.3.7. These include considering landowner input when placing structures and preserving the natural landscape to the extent possible by not unnecessarily destroying the natural surroundings and minimizing tree removal.¹²¹

¹¹³ ORDER at Draft Route Permit Section 5.3.6 (Aug. 14, 2026) (eDocket No. [20268-235391-01](#)).

¹¹⁴ Application at 37.

¹¹⁵ Application at 37.

¹¹⁶ Application at 37.

¹¹⁷ Application at 38.

¹¹⁸ Application at 38.

¹¹⁹ Application at 39.

¹²⁰ Application at 38.

¹²¹ ORDER at Draft Route Permit Section 5.3.7 (Aug. 14, 2026) (eDocket No. [20268-235391-01](#)).

4. Socioeconomics

105. Anticipated socioeconomic impacts related to the Project are expected to be positive, but minimal.¹²²

106. Construction of the Project will last approximately 2.5 years.¹²³ Xcel Energy anticipates that approximately 20 to 30 daily contract workers will be employed for the construction of the transmission line, expansion of the North Rochester Substation, and modifications at the North Rochester Substation. Xcel Energy typically hires contractors who pay their employees at or better than prevailing wages. No new permanent jobs will result from construction and operation of the transmission line or the North Rochester Substation. Operation and maintenance activities will be conducted by existing Xcel Energy employees.¹²⁴

107. Google anticipates that 25 to 40 daily contract workers will be employed for the construction of the Project Skyway Substations. Operation and maintenance activities associated with the Project Skyway Substations will require three to five new permanent jobs.¹²⁵

108. The Project will support multiple employment sectors (i.e., utilities, construction, manufacturing) and provide employment opportunities during the duration of construction and operation. During construction, local businesses may experience increases in revenue due to increased purchase of goods and services. Local construction crew expenditures will result in temporary, positive impacts on local economies.¹²⁶

109. Long-term benefits of the Project include an increase in local tax base from the incremental increase in revenues from utility property taxes.¹²⁷

110. Section 9.5 of the Draft Route Permit requires the permittees, their contractors, and subcontractors to pay no less than the prevailing wage rate as defined by Minn. Stat. § 177.42.¹²⁸

111. Studies generally find that transmission lines have a small or no impact on residential property values. The impact on property values from the presence of a high voltage transmission line is influenced by a complex interaction of factors. Most of these factors are parcel-specific: condition, size, improvements, acreage, and neighborhood characteristics; the proximity to schools, parks, and other amenities; and

¹²² Application at 74.

¹²³ Application at 74.

¹²⁴ Application at 19, 21-22.

¹²⁵ Application at 23.

¹²⁶ Application at 19, 74.

¹²⁷ Application at 74.

¹²⁸ ORDER at Draft Route Permit Section 9.5 (Aug. 14, 2026) (eDocket No. [20268-235391-01](#)).

the presence of existing infrastructure (e.g., highways, railways, power lines). The presence of a high voltage transmission line becomes one of many interacting factors that could affect a specific property value. Impacts on property values can be mitigated by reducing aesthetic impacts by collocating the transmission line with existing infrastructure, and landowners will be compensated for any easements.¹²⁹

5. Environmental Justice

112. Minnesota Statute § 216B.1691, subd. 1(e) defines environmental justice areas as an area that meets one or more of the following criteria: (1) 40 percent or more nonwhite populations; (2) 35 percent or more households with income less than or equal to 200 percent of the poverty level; (3) 40 percent or more residents with limited English proficiency (LEP); or (4) Indian country as defined by 18 U.S.C. § 1151.¹³⁰

113. Census tracts that intersect with the Project's route width were analyzed for environmental justice areas. Census Tract 808 is the only tract within the Project route width. Census Tract 808 is not an environmental justice community because it does not meet the MPCA's criteria discussed above for non-white populations, low-income populations, or LEP populations. Census Tract 808 is also not within a federally recognized tribal area or areas recognized as tribal areas.¹³¹

114. No census tracts within the Project's route width are considered environmental justice communities under the definition provided in Minn. Stat. § 216B.1691, subd. 1(e), therefore, the Project is not anticipated to disproportionately affect environmental justice communities.¹³²

6. Cultural Values

115. Cultural values are based on core principles and beliefs that form the foundation for community unity.¹³³ Construction of the Project is not expected to conflict with work, leisure, or cultural pursuits in the Project Area. The area is generally rural in nature with small historic municipal pockets and an agriculture-based economy. No aspects of the culture in the area are anticipated to be impacted significantly or changed as a result of the construction and operation of the Project.¹³⁴

7. Recreation

116. Recreational opportunities in Goodhue County include snowmobiling, hiking, biking, horseback riding, canoeing, and paddleboarding. Recreation resources

¹²⁹ Application at 75.

¹³⁰ Application at 43-44.

¹³¹ Application at 45.

¹³² Application at 45.

¹³³ Application at 40.

¹³⁴ Application at 42.

include the Goodhue County snowmobile trail, the Douglas State Trail, and the Zumbro River State Water Trail.¹³⁵

117. The Project spans the Goodhue County snowmobile trail. Snowmobile trails are used frequently for recreational activities during the winter.¹³⁶

118. A portion of the Douglas State Trail is located approximately 0.86 miles from the Proposed Route. The Project does not cross any portion of the Douglas State Trail.¹³⁷ The North Branch Middle Fork Zumbro River, which is part of the Zumbro River State Water Trail, is located 0.35 miles from the Proposed Route. However, the Project does not cross any portion of the Zumbro River or the Zumbro River State Water Trail.¹³⁸

119. Impacts on recreation are anticipated to be minimal and would mostly be related to expansion of the North Rochester Substation because it will cross a portion of the Goodhue County snowmobile trail. Xcel Energy will attempt to avoid or limit trail closures, to the maximum extent practicable, and will use conductor support structures for safety guides over roads or utilize helicopters for stringing, where possible. Construction impacts will be temporary, and the use of best management practices will be used to limit noise and fugitive dust during construction. Xcel Energy will work with applicable stakeholders to find an alternative route for the Goodhue County snowmobile trail.¹³⁹

8. Public Services and Transportation

120. Impacts on law enforcement, fire services, medical services, water and wastewater services, school districts, utilities, and other public services are expected to be negligible during construction and operation of the Project.¹⁴⁰

121. Existing electric service within one mile of the anticipated alignment (Study Area)¹⁴¹ is provided by Xcel Energy. The proposed 345/345 kV transmission line parallels existing Xcel Energy transmission lines for approximately 0.55 miles.¹⁴² Damage to utility pipelines or water lines are expected to be negligible because the proposed transmission lines will be designed to span the existing right-of-way of underground utilities.¹⁴³

¹³⁵ Application at 71.

¹³⁶ Application at 71.

¹³⁷ Application at 71.

¹³⁸ Application at 72.

¹³⁹ Application at 72-73.

¹⁴⁰ Application at 66.

¹⁴¹ Application at 35.

¹⁴² Application at 61.

¹⁴³ Application at 66.

122. Impacts on radio, television, cellular phones, or GPS units are expected to range from negligible to minimal during the construction and operation of the Project.¹⁴⁴

123. Minimal to moderate and short-term impacts on transportation are expected. Project construction could impact roadways and result in temporary closures, lane closures, traffic delays, and increased traffic volumes due to the presence and movement of personal and construction vehicles by Project construction employees. Additionally, construction along roadways can increase dust as grading occurs, which can obscure road lines or vision. Concerns related to construction along roadways or trails would be temporary and localized to areas where active construction is underway. The Proposed Route does not cross any rail lines, and no airports or airstrips are within 20,000 feet of the right-of-way for the Proposed Route.¹⁴⁵

124. Because no impacts on public services and transportation are anticipated, no mitigation is proposed.¹⁴⁶

9. Land Use and Zoning

125. Land use within the Proposed Route is rural, consisting primarily of cultivated crops with scattered areas of low intensity development.¹⁴⁷

126. The Project is anticipated to be consistent with authorized uses within the affected zoning areas crossed. The Proposed Route predominantly crosses areas currently zoned as agricultural. Transmission lines and associated facilities are typically either permitted or conditional uses in areas zoned as agricultural, and transmission lines and substations currently exist in these areas within and adjacent to the Proposed Route. The Proposed Route does not cross scenic river, shoreland, or floodplain management districts that would require special land use provisions.¹⁴⁸

127. Existing land uses along the Project would experience short-term impacts during construction.¹⁴⁹ When construction is complete, the Applicants will restore the right-of-way. Because Project impacts on planning and zoning are anticipated to be negligible, the Applicants do not propose additional mitigation measures specific to land use and zoning.¹⁵⁰

¹⁴⁴ Application at 66.

¹⁴⁵ Application at 67.

¹⁴⁶ Application at 67.

¹⁴⁷ Application at 69.

¹⁴⁸ Application at 70.

¹⁴⁹ Application at 70-71.

¹⁵⁰ Application at 70.

B. Effects on Public Health and Safety

1. Electronic Interference

128. Operation of transmission lines can interfere with technology that produces amplitude modulation (AM) radio frequency signals, including radio stations, televisions, cellular phones, and Global Positioning System (GPS) devices. Overhead transmission lines are designed to not cause radio or television interference under typical operating conditions.¹⁵¹

129. Impacts on radio, television, cellular phones, or GPS units are expected to range from negligible to minimal during the construction and operation of the Project. Corona and electrical spark discharge (gap discharge) from transmission line conductors can generate noise at the same frequency that some AM radio signals are transmitted and can, therefore, result in some noise interference. AM radio interference generally occurs directly below transmission lines and will dissipate rapidly with increased distance from the transmission line right-of-way. Signals for FM radio are generally high enough to not be influenced by corona or gap discharge. Television broadcast frequencies (digital and satellite) are typically not impacted by operation of transmission lines because signals are high enough to not be influenced by corona-generated interference. Cellular phone signals use an ultra-high frequency, generally around 900 MHz, which is significantly higher than the range of electromagnetic noise generated by transmission line conductors. GPS signals operate at a higher frequency as well, within the range of 1,225 to 1,575 MHz. Because both cellular phone signals and GPS operate at frequencies outside the range of electromagnetic noise generated by transmission line conductors, the risk of interference is negligible.¹⁵²

130. Section 5.4.3 of the Draft Route Permit requires that the permittees take necessary actions to restore communications services, including radio, television, satellite, wireless internet, and GPS-based systems, if the Project causes interference.¹⁵³

2. Electric and Magnetic Fields (EMF)

131. Electric and magnetic fields (EMF) are invisible areas of energy associated with use of electrical power. For the lower frequencies associated with power lines (referred to as extremely low-frequency [ELF]), EMF should be considered separately—electric fields (EF) and magnetic fields (MF), measured in kV/m and milligauss (mG), respectively.¹⁵⁴

132. There is no state or federal standard for transmission line electric field levels. The Commission has imposed a maximum electric field limit of 8 kV/m

¹⁵¹ Application at 61.

¹⁵² Application at 66-67.

¹⁵³ ORDER at Draft Route Permit Section 5.4.3 (Aug. 14, 2026) (eDocket No. [20268-235391-01](#)).

¹⁵⁴ Application at 46.

measured at 1 meter above ground and this limit is included in Section 5.4.2 of the Draft Route Permit.¹⁵⁵

133. There are no federal or Minnesota exposure standards for MF.¹⁵⁶

134. The Applicants calculated electric and magnetic fields for two different typical system conditions during the proposed transmission line's first year in service. The maximum electric field for the proposed transmission line is approximately 4.14 kV/m.¹⁵⁷ This is well below the Commission's electric field limit of 8.0 kV/m.¹⁵⁸ The maximum magnetic field at the edge of the transmission right-of-way was calculated to be 45 mG.¹⁵⁹

135. Levels of EMF from the Project are below acceptable Minnesota limits for electric fields and magnetic fields. Potential impacts are anticipated to be minimal. Since the 1970s, a large amount of scientific research has been conducted on EMF and health. This large body of research has been reviewed by many leading public health agencies, such as the U.S. National Cancer Institute, the U.S. National Institute of Environmental Health Sciences, and the World Health Organization (WHO), among others. These reviews do not show that exposure to electric power EMF causes or contributes to adverse health effects.¹⁶⁰

3. Induced and Stray Voltage

136. "Stray voltage" is a condition that can potentially occur on a property or on the electric service entrances to buildings from distribution lines connected to these buildings. Transmission lines do not, by themselves, create stray voltage because they do not connect directly to businesses or residences. Transmission lines, however, can induce voltage on a distribution circuit that is parallel and immediately under the transmission line. If the proposed transmission lines are parallel or cross distribution lines, appropriate mitigation measures can be taken to address any induced voltages.¹⁶¹

137. Section 5.4.1 of the Draft Route Permit requires the permittees to address and rectify any induced current problems that arise during operation of the proposed transmission line.¹⁶²

¹⁵⁵ Application at 48; ORDER at Draft Route Permit Section 5.4.2 (Aug. 14, 2026) (eDocket No. [20268-235391-01](#)).

¹⁵⁶ Application at 52.

¹⁵⁷ Application at 55.

¹⁵⁸ Application at 55.

¹⁵⁹ Application at 51.

¹⁶⁰ Application at 52.

¹⁶¹ Application at 53-54.

¹⁶² ORDER at Draft Route Permit Section 5.4.1 (Aug. 14, 2026) (eDocket No. [20268-235391-01](#)).

4. Emergency Services

138. Emergency services near the Project are provided by nearby cities and counties. The Goodhue County's sheriff's department provides law enforcement services for the City of Pine Island. City and community fire departments provide fire services in the Project Study Area. A total of seven hospitals and clinics offer emergency services within a 25-mile radius of the Project.¹⁶³

139. Impacts on law enforcement, fire services, and medical services are expected to be negligible during construction and operation of the Project.¹⁶⁴

5. Public and Worker Safety

140. Potential worker hazards present at a transmission line or substation construction site are similar to those at most large construction sites. Public and worker safety concerns related to construction may include hazards associated with conductor stringing in public areas, movement of heavy equipment across roadways, and land clearing. Potential operational safety concerns include electrocution, fire, and outages.¹⁶⁵

141. Impacts on public and worker safety are anticipated to be negligible because the Project will be designed to meet or exceed local, state, NESC, and the Applicants' standards regarding ground clearance, crossing utilities clearance, building clearance, strength of materials, and right-of-way width.¹⁶⁶ The substation facilities will be fenced properly and accessible by authorized personnel only.¹⁶⁷

142. Section 5.5.1 of the Draft Route Permit requires the Project to meet or exceed all applicable local, state, NESC, and North American Electric Reliability Corporation (NERC) safety and design standards.¹⁶⁸

C. Effects on Land-Based Economies

143. Minnesota's transmission line routing factors require consideration of the Project's impacts to land-based economies, specifically, agriculture, forestry, tourism, and mining.¹⁶⁹

¹⁶³ Application at 60.

¹⁶⁴ Application at 66.

¹⁶⁵ Application at 46.

¹⁶⁶ Application at 55.

¹⁶⁷ Application at 55.

¹⁶⁸ ORDER at Draft Route Permit Section 5.5.1 (Aug. 14, 2026) (eDocket No. [20268-235391-01](#)).

¹⁶⁹ Minn. Stat. § 216I.05, subd. 4(a)(3).

1. Agriculture

144. There are approximately 1,400 farms in Goodhue County with an average farm size of 309 acres.¹⁷⁰ Approximately \$339 million in total crop sales and \$256 million in total livestock sales were generated from farms in Goodhue County in 2022.¹⁷¹

145. The Project Area is composed of 79.2 percent of prime farmland, and the Proposed Route is composed of 68.7 percent of prime farmland.¹⁷² There are no center pivot irrigation systems present in the Proposed Route. No organic farms will be impacted by the Project. There are no registered apiaries within 1 mile of the Proposed Route.¹⁷³

146. Temporary construction impacts on agricultural land could include soil compaction and rutting, accelerated soil erosion, crop disturbance, disruption to normal farming activities, and introduction of noxious weeds. Construction could occur throughout the year, with structures being constructed outside of growing and harvest seasons. During winter, impacts are not anticipated to affect agricultural activities because crop fields are unplanted and the ground is frozen.¹⁷⁴ Long-term impacts on agricultural production will occur where structures are placed in cultivated fields.

147. West of US 52, impacts on agriculture are expected to be negligible as much of this portion of the Project Area is already used for utility infrastructure such as the existing North Rochester Substation.¹⁷⁵ East of US 52, impacts on agriculture are expected to be moderate to significant because existing agricultural land will be developed as part of the Project Skyway Data Center Campus, including the Project Skyway Substations.¹⁷⁶ The Applicants will work with individual landowners through the easement process to verify the locations of existing drain tile, if present, and determine measures to avoid and minimize impacts on drain tile.¹⁷⁷

148. A draft Agricultural Mitigation Plan (AIMP) was filed with the Application. The AIMP was developed with the Minnesota Department of Agriculture and identifies measures Xcel Energy will take during construction to avoid, mitigate, minimize, repair, or provide compensation for impacts on cultivated agricultural land.¹⁷⁸

¹⁷⁰ Application at 76.

¹⁷¹ Application at 76.

¹⁷² Application at 77.

¹⁷³ Application at 77.

¹⁷⁴ Application at 78.

¹⁷⁵ Application at Appendix B at B-5.

¹⁷⁶ Application at 78.

¹⁷⁷ Application at 78.

¹⁷⁸ Application at Appendix G.

149. Moreover, the Draft Route Permit also contains provisions to mitigate and minimize impacts to agricultural land. Section 5.3.8 requires the permittees to implement erosion prevention and sediment control practices. Section 5.3.11 requires landowner notification prior to pesticide application and requires the permittees to apply pesticides in a safe and cautious manner so as to not damage adjacent crops. Section 5.3.12 requires the permittees to employ best management practices to avoid the potential introduction and spread of invasive species and to develop an Invasive Species Prevention Plan. Section 5.3.21 requires the permittees to fairly restore or compensate landowners for damages to crops, fences, or drain tile.¹⁷⁹

2. Forestry

150. There are no commercial forest operations or State-managed forest land in the Project Area.¹⁸⁰

151. The Project will not result in any impact on commercial forestry operations; therefore, no mitigation is proposed.¹⁸¹

3. Mining

152. Mining is not a major industry in the Project Area. There are no mining operations within the Proposed Route therefore, impacts will not occur. No mitigation is proposed.¹⁸²

4. Tourism

153. Tourism in Goodhue County consists of county fairs, outdoor recreation, and a historical society.¹⁸³

154. Impacts on tourism are anticipated to be negligible to minimal. Construction of the Project is not anticipated to affect available tourism opportunities. Impacts on tourism will be similar to those related to recreation and will be related mostly to Project construction, which will be temporary and confined to specific areas not located near tourist amenities. As potential impacts on tourism will be minimal, no mitigation measures are proposed.¹⁸⁴

¹⁷⁹ ORDER at Draft Route Permit Sections 5.3.8, 5.3.11, 5.3.12, and 5.3.21 (Aug. 14, 2026) (eDocket No. [20268-235391-01](#)).

¹⁸⁰ Application at 80.

¹⁸¹ Application at 80.

¹⁸² Application at 80-81.

¹⁸³ Application at 81.

¹⁸⁴ Application at 81.

D. Effects on Archeological and Historic Resources

155. Minnesota law requires consideration of the effects of the Project on archeological and historic resources.¹⁸⁵

156. Stantec Consulting Services, Inc. (Stantec) was retained to evaluate the presence of cultural resources in and near the proposed Data Center Campus, which is inclusive of the Project Skyway Substations. Stantec identified three previously recorded, above-ground historic resources within the Data Center Campus. All three had been determined not eligible for inclusion in the NRHP; as such, the Project will not impact these identified resources.¹⁸⁶

157. The Data Center Campus is within the mapped boundary of the Catholic Cemetery, a historic cemetery mapped at the township-level and was only identified through archival research. Additional archival research conducted by Stantec indicated the actual location of the Catholic Cemetery is south of the City of Pine Island and outside of the Data Center Campus.¹⁸⁷

158. Stantec conducted an additional cultural literature review prior to fieldwork and did not identify additional sites.¹⁸⁸

159. Stantec conducted a Phase I Archaeological Reconnaissance Survey and identified no new archaeological sites in the proposed Data Center Campus. Further, no evidence of the Catholic Cemetery was identified in the Data Center Campus. Based on the archival review and the results of the field survey, the Catholic Cemetery is likely not within the Data Center Campus.¹⁸⁹ Stantec determined that no properties listed in the National or State Registers of Historic places will be affected by the Project Skyway Substations.¹⁹⁰

160. HDR was retained to conduct a Cultural Resources Literature review and Phase I Archaeological Survey for the remaining areas of potential construction disturbance for the Project, including the North Rochester Substation Expansion Area¹⁹¹ and 150-foot-wide right-of-way for the 345/345 kV transmission line up to its connection with the Project Skyway Substations.¹⁹²

161. HDR also conducted a Cultural Resources Literature Review in October 2025 by reviewing records maintained by the Minnesota Office of the State

¹⁸⁵ Minn. Stat. § 216I.05, subd. 4(a)(4).

¹⁸⁶ Application at 82.

¹⁸⁷ Application at 82.

¹⁸⁸ Application at 82.

¹⁸⁹ Application at 82.

¹⁹⁰ Application at 82.

¹⁹¹ Application at 82.

¹⁹² Application at 82.

Archaeologist (OSA). These files were reviewed to identify previously reported archaeological sites within 1 mile of the North Rochester Substation Expansion Area and transmission line right-of-way and previously inventoried architectural history properties within 0.25 mile of the North Rochester Substation Expansion Area and transmission line right-of-way (Archaeological Review Area).¹⁹³

162. Within the Archaeological Review Area, HDR did not identify any previously recorded archaeological sites. HDR did identify two known cemeteries within the Archaeological Review Area, but neither of these known cemeteries are located within the North Rochester Substation Expansion Area or transmission line right-of-way.¹⁹⁴

163. There are seven previously inventoried architectural history properties within the Architectural History Review Area, and three of these intersect with the North Rochester Substation Expansion Area and/or transmission line right-of-way.¹⁹⁵ The three architectural history properties are determined by SHPO to be Not Eligible for listing in the NRHP, State Register of Historic Places, or the Historic Sites Network.¹⁹⁶

164. On October 29, 2025, HDR conducted a Phase I Archaeological Reconnaissance Survey of the North Rochester Substation Expansion Area and transmission line right-of-way and did not identify any cultural materials.¹⁹⁷ The existing North Rochester Substation was not surveyed.¹⁹⁸

165. Impacts on archeological or historic resources are expected to be negligible. The Project will have no negative effects on any eligible or potentially eligible buried cultural resources.¹⁹⁹ Based on the results of the architectural history background research, there are no properties within the Project Area or Architectural History Review Area that are listed in the NRHP, State Register of Historic Places, or the Historic Sites Network.²⁰⁰ Therefore, the Project, as proposed, will have no negative effects on historic architectural history properties.

166. The Applicants will prepare an Unanticipated Discoveries Plan prior to construction of the Project.²⁰¹

167. Section 5.3.15 of the Draft Route Permit requires the permittees to make every effort to avoid impacts to archaeological and historic resources when

¹⁹³ Application at 82.

¹⁹⁴ Application at 82.

¹⁹⁵ Application at 82.

¹⁹⁶ Application at 82.

¹⁹⁷ Application at 83 and Appendix H.

¹⁹⁸ Application at 83.

¹⁹⁹ Application at 83.

²⁰⁰ Application at 83.

²⁰¹ Application at 83.

constructing the Project. In the event that a resource is encountered, the permittees are required to consult with SHPO and the State Archaeologist. The Draft Route Permit also requires the permittees to prepare an Unanticipated Discoveries Plan prior to construction of the Project.²⁰² This section of the Draft Route Permit also requires that prior to construction, the permittees 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 permittees shall immediately halt construction and promptly notify local law enforcement and appropriate State agencies. The permittees shall not resume construction at such location until authorized by local law enforcement, the State Archaeologist, or MIAC.²⁰³

E. Effect on Natural Environment

168. Minnesota's routing factors require consideration of the Project's effect on the natural environment, including effects on air and water quality resources and flora and fauna.²⁰⁴

1. Air Quality

169. Potential air quality impacts associated with the Project come from two primary sources: short-term emissions from construction activities and ozone and nitrogen oxide emissions from operating the transmission line and substation facilities.²⁰⁵

170. Potential air quality impacts during construction are expected to be minimal and short term. Construction of the Project will result in intermittent and temporary emissions of criteria pollutants. These emissions generally include dust generated from soil-disturbing activities, such as earthmoving and wind erosion associated with right-of-way clearing and construction machinery, and indirect emissions attributable to construction workers commuting to and from work sites during construction. These emissions will be dependent upon weather conditions, the amount of equipment at any specific location, and the period of operation required for construction at that location. Air pollutants from the construction equipment will be limited to the immediate vicinity of the construction area and will be temporary.²⁰⁶

171. To mitigate fugitive dust emissions generated during construction the Applicants will use common best management practices, which may include watering

²⁰² ORDER at Draft Route Permit Section 5.3.15 (Aug. 14, 2026) (eDocket No. [20268-235391-01](#)).

²⁰³ ORDER at Draft Route Permit Section 5.3.15 (Aug. 14, 2026) (eDocket No. [20268-235391-01](#)).

²⁰⁴ Minn. Stat. § 2161.05, subd. 4(a)(5).

²⁰⁵ Application at 84-87.

²⁰⁶ Application at 87.

and chemical suppressants.²⁰⁷ Section 5.3.23 of the Draft Route Permit requires the permittees to use non-chloride products for onsite dust control during construction.²⁰⁸

172. During operation of the transmission line and substations, air emissions will be minimal. Air pollutant emissions would come from infrequent vehicle or helicopter use during routine operation and maintenance activities. A small amount of ozone will be created due to corona from the operation of the transmission line. As corona signifies a loss of electricity, the Applicants have engineered the transmission line to limit corona. During operation, corona effects will be minimized by using good engineering practices, such as using bundled conductors.²⁰⁹

2. Surface Waters and Wetlands

173. No floodplains are mapped within the Project Area or Proposed Route.²¹⁰

174. The Project will not impact or cross impaired waters and will not cause a water to be newly listed as impaired.²¹¹

175. The Proposed Route does not cross any lakes or streams. Two MnDNR National Wetland Inventory (NWI) wetlands totaling 0.81 acres were mapped within the Proposed Route. No Public Waters Inventory (PWI) basins, watercourses, or wetlands were mapped within the Proposed Route. A PWI watercourse, the Zumbro River, was mapped within 1 mile of the Proposed Route.²¹² Two wetlands totaling 0.07 acres were identified within the proposed transmission line right-of-way. These wetlands are Type 2 – wet meadows dominated by the non-native and invasive reed canary grass.²¹³ No other surficial water resources were identified within the right-of-way.²¹⁴

176. No calcareous fens, karst features, or springs were mapped within the Proposed Route.²¹⁵

177. Impacts on surface water and wetlands are expected to be negligible to minimal. There were two Type 2 wetlands within the transmission line right-of-way, and the Project has been designed to avoid impacts on these wetlands by spanning them.²¹⁶ The Applicants will develop a Storm Water Prevention Plan (SWPPP) for the Project and implementation of the protocols outlined in the SWPPP will minimize

²⁰⁷ Application at 87.

²⁰⁸ ORDER at Draft Route Permit Section 5.3.23 (Aug. 14, 2026) (eDocket No. [20268-235391-01](#)).

²⁰⁹ Application at 86-87.

²¹⁰ Application at 95.

²¹¹ Application at 95-96.

²¹² Application at 95.

²¹³ Application at 95.

²¹⁴ Application at 95.

²¹⁵ Application at 96.

²¹⁶ Application at 96.

impacts on wetlands, streams, and floodplains during construction of the Project. The Applicants' construction contractors will use best management practices, including silt fences and temporary stabilization, as applicable, during construction to minimize any impacts to surface waters and wetlands.²¹⁷

178. Section 5.3.9 of the Draft Route Permit requires a variety of measures to mitigate potential impacts on wetlands, waterbodies, and floodplains. This includes spacing structure locations to span and avoid these resources, accessing these areas in a way that minimizes travel through them, and constructing during frozen ground conditions to the extent possible, among other requirements.²¹⁸

3. Groundwater

179. The Project is within the Karst Province, which is characterized by a thin glacial sediment overlaying thick carbonate and sandstone bedrock prone to conduits, sinkholes, and caves.²¹⁹

180. The Minnesota County Well Index indicates that there are no wells within the Proposed Route.²²⁰

181. Potential impacts to groundwater are expected to be minimal. Construction and operation of the transmission line and substations have the potential to impact groundwater through temporary, construction-related impacts. Because there are no wells within the Proposed Route, the Project is not anticipated to impact groundwater resources. Any impacts on groundwater resources would be localized, short-term, and would not affect any underlying aquifer.²²¹

182. The Applicants will conduct geotechnical investigations of the Project Area to identify shallow depth to aquifer areas and will continue to work with landowners to identify springs and wells near the proposed Project. If shallow depth aquifer areas are discovered, the Applicants will use specialty structures that require wider, shallower excavation areas to avoid impacts on groundwater resources.²²²

4. Wildlife and Habitat

183. There are no state parks, state forests, state migratory waterfowl feeding and resting areas, state Wildlife Management Areas (WMAs), or Scientific and Natural Areas (SNAs) within 1 mile of the Proposed Route. There are also no federal Waterfowl Production Areas, national wildlife refuges, or federal forests within 1 mile of the

²¹⁷ Application at 97.

²¹⁸ ORDER at Draft Route Permit Section 5.3.9 (Aug. 14, 2026) (eDocket No. [20268-235391-01](#)).

²¹⁹ Application at 89.

²²⁰ Application at 89.

²²¹ Application at 90.

²²² Application at 90.

Proposed Route.²²³ There were no mapped National Audubon Society Important Bird Areas (IBAs) within 1 mile of the proposed transmission line centerline.²²⁴

184. There are two State-managed marginal cropland-perpetual conservation easements within 1 mile of the Proposed Route.²²⁵

185. There is minimal potential for the permanent displacement of wildlife and loss of habitat from construction of the Project. Wildlife that inhabits natural areas within the Proposed Route could be impacted in the short term within the immediate area of construction.²²⁶

186. Raptors, waterfowl, and other bird species might be affected by the construction and placement of the transmission line. Potential collisions with the transmission line pose a risk of injury or death to bird species. These impacts often involve waterfowl species and larger birds, such as raptors.²²⁷ To mitigate impacts on potential bird strikes and electrocutions, the Project will be constructed according to Avian Power Line Interaction Committee (APLIC) recommended guidelines to reduce the potential for avian collisions.²²⁸ Section 5.3.16 of the Draft Route Permit requires the permittees to cooperate with the MnDNR to identify bird diverter locations and to design the transmission line consistent with APLIC standards.²²⁹

5. Rare and Unique Natural Resources

187. Based on a review of the MnDNR Natural Heritage Information System data, there were no records of rare species within the Proposed Route. There were records of two State special concern species, two State threatened species, and a State endangered species within 1 mile of the Proposed Route. The five species include the State special concern Ozark minnow and creek heelsplitter mussel, State threatened glade mallow plant and ellipse mussel, and State endangered Blanchard's cricket frog.²³⁰

188. Based on an April 2026 review of United States Fish and Wildlife Services IPAc system data, the federally endangered northern long-eared bat, federally threatened prairie bush-clover, proposed threatened monarch butterfly, and non-essential population of whooping crane may occur within the Proposed Route.²³¹

189. Impacts on rare and unique natural habitats are expected to be negligible. There were no Minnesota Biological Survey (MBS) sites of biodiversity significance,

²²³ Application at 102.

²²⁴ Application at 102.

²²⁵ Application at 102.

²²⁶ Application at 102.

²²⁷ Application at 102.

²²⁸ Application at 103.

²²⁹ ORDER at Draft Route Permit Section 5.3.16 (Aug. 14, 2026) (eDocket No. [20268-235391-01](#)).

²³⁰ Application at 104.

²³¹ Application at 106.

MnDNR native plant communities (NPC), MnDNR railroad right-of-way prairies, or MnDNR Native Prairie Bank easements mapped within the right-of-way, route width, or immediately adjacent to the route width. No impacts on the MBS sites of biodiversity significance or MnDNR NPCs within one mile of the route width are expected during Project construction or operation.²³²

190. Suitable habitat is not available for the Ozark minnow, creek heelsplitter, ellipse mussel, or Blanchard's cricket frog within the Proposed Route and, therefore, no impacts are anticipated. There is potentially suitable glade mallow habitat along the intermittent stream where it traverses the wooded area in the northwestern portion of the Proposed Route. No direct impacts on potentially suitable glade mallow habitat are expected during Project construction or operation, and soil and erosion best management practices will minimize or avoid any indirect impacts on the species or its habitat.²³³

191. Impacts on suitable monarch butterfly habitat may occur during Project construction. However, there are currently no legal protections for the monarch butterfly or its habitat. If the monarch butterfly is federally listed as threatened, the Applicants will review Project activities for potential impacts and develop appropriate avoidance and mitigation.²³⁴

192. There is no suitable prairie bush-clover habitat available within the Proposed Route; therefore, no impacts are anticipated. Impacts on whooping cranes are not expected.²³⁵

193. The Applicants will avoid impacts on federal- and state-listed species to the maximum extent practicable and will coordinate with the appropriate federal or state agency in the unlikely event of unavoidable impacts on listed species.²³⁶

194. The MnDNR recommended a special permit condition requiring the Applicants to avoid tree removal from June 1 through August 15 to minimize impacts to bird and bat species. The Applicants had no objection to the proposed condition so long as it included the phrase "to the extent practicable."²³⁷

6. Geology and Topography

195. Bedrock in the Project Area consists of shale, sandstone, and limestone. Elevations range from about 1,016 feet above sea level to 1,090 feet above sea level within the Project Area and from 1,012 feet above sea level to 1,148 feet above sea level

²³² Application at 107.

²³³ Application at 108.

²³⁴ Application at 108.

²³⁵ Application at 108.

²³⁶ Application at 108.

²³⁷ Application at 108.

within the route width. Topography within the Project Area is predominately flat with areas of rolling plains.²³⁸

196. Impacts on geology are expected to be minimal. The North Rochester Substation Expansion Area and the Project Skyway Substations will require grading to create level pads for the substation equipment. Limited, if any, grading will occur within the proposed transmission line right-of-way.²³⁹

197. To mitigate impacts, the Applicants will conduct geotechnical analyses, where appropriate, to evaluate whether karst areas are present at structures, and micrositng and structure foundation design will account for the presence of karst and the potential for dewatering, as needed.²⁴⁰ If geotechnical analyses determine that temporary dewatering or water appropriations would be required, the Applicants will coordinate with MnDNR to obtain the necessary permits.²⁴¹

7. Soils

198. Potential impacts on soil are expected to be moderate. Short term impacts to soil will occur during construction and permanent impacts will occur as a result of operation of the Project. Construction may require some amount of grading to provide a level surface for safe operation of construction equipment. In addition, potential topsoil and subsoil mixing may result from the excavation, stockpiling, and redistribution of soils during installation of transmission line structures and substation components.²⁴² Construction of a substation would result in permanent impacts on soils for that facility's operational lifetime.²⁴³

199. Temporary impacts on soils during construction of the transmission line will be temporary and minor and mitigated through best management practices, such as minimizing the number of vehicle trips, use of silt fencing or other effective sediment controls, and segregation of topsoil and subsoil.²⁴⁴

200. The Applicants will also develop an SWPPP and implement reasonable measures to reduce soil compaction and commit to decompaction of soils during restoration of temporary workspaces.²⁴⁵

201. Section 5.3.8 of the Draft Route Permit also requires the permittees to take reasonable measures to minimize soil erosion and sedimentation.²⁴⁶

²³⁸ Application at 88.

²³⁹ Application at 90.

²⁴⁰ Application at 90.

²⁴¹ Application at 90.

²⁴² Application at 92.

²⁴³ Application at 92.

²⁴⁴ Application at 93.

²⁴⁵ Application at 93.

²⁴⁶ ORDER at Draft Route Permit Section 5.3.8 (Aug. 14, 2026) (eDocket No. [20268-235391-01](#)).

8. Greenhouse Gas Emissions

202. Greenhouse gases (GHG) are gaseous emissions that trap heat in the atmosphere. The most common GHGs emitted from human activities include carbon dioxide, methane, and nitrous oxide.²⁴⁷

203. Sulfur hexafluoride (SF₆), a GHG, is used as an insulating material in substation breakers. Under normal operations and with adequate routine maintenance, the SF₆ remains contained in the breakers and is not released to the atmosphere.²⁴⁸

204. GHG emissions generated during construction and routine maintenance of the Project will be minimal. Vehicle emissions will be mitigated by limiting idling to only times when necessary. Construction equipment will be required to have proper tuning and maintenance to ensure it is in good working order to minimize GHG emissions.²⁴⁹

205. During operation of the substations, the Applicants will monitor the SF₆ gas levels in the breakers as part of the routine monitoring of substation equipment.²⁵⁰

9. Climate Change and Resilience

206. Climate change is the change in global or regional climate patterns over time. Over the past century, Minnesota's climate has been changing and will continue to do so. Noticeable effects in the future may include warmer periods during winter and at night, increased precipitation and heavier downpours, increased summer heat, and the potential for longer dry spells.²⁵¹

207. The Project will be designed and engineered to be resilient under changing climatic factors, including increased average temperatures and changes in precipitation intensities and quantities.²⁵² Electric transmission equipment can withstand the anticipated increases in temperature, and changes in weather patterns are accounted for in the Project design. The Applicants do not propose additional mitigative measures specific to climate change.²⁵³

F. Unavoidable Impacts

208. Minnesota's transmission line routing factors require consideration of the adverse human and natural environmental effects that cannot be avoided.²⁵⁴

²⁴⁷ Application at 108.

²⁴⁸ Application at 110.

²⁴⁹ Application at 111.

²⁵⁰ Application at 111.

²⁵¹ Application at 111.

²⁵² Application at 112.

²⁵³ Application at 112.

²⁵⁴ Minn. Stat. § 216I.05, subds. 4(a)(9), 11(b)(6).

209. Unavoidable adverse impacts due to construction of the Project include: increased traffic on roads in the vicinity of the Project and potential short-term traffic delays on public roadways; visual disturbance to nearby residents and recreationalists; noise emitted from vehicles and equipment during construction that will be audible to neighboring landowners and recreationalists; temporary impacts on agricultural operations, such as crop losses, soil compaction, and erosion; vegetation clearing that could result in minor amounts of habitat loss; temporary disturbance to and displacement of wildlife, as well as direct impacts on wildlife inadvertently struck or crushed during structure placement or other construction activities; and minor air quality impacts due to construction vehicle emissions and fugitive dust.²⁵⁵

210. Unavoidable adverse impacts due to the operation of the Project include: changes to existing aesthetics of landscape (from predominantly agricultural to transmission line or substation), which will be visible from local roadways and parcels; physical impacts on land use and change in land cover where the permanent Project structures exist and/or where the ROW requires vegetation maintenance; injury or death of avian species that collide with, or are electrocuted by, conductors; and continued maintenance of tall-growing vegetation within the right-of-way to comply with NESC requirements.²⁵⁶

G. Irreversible and Irretrievable Commitments of Resources

211. Minnesota's transmission line routing factors require consideration of the irreversible and irretrievable commitments of resources that are necessary for the Project.²⁵⁷

212. Irreversible impacts include the land required to construct the Project. While the land underlying the North Rochester Substation, North Rochester Substation Expansion Area, and the Data Center Campus could be restored to agricultural use or some other land use, tall growing woody vegetation could revegetate within the transmission line right-of-way, and certain Project components could be reused or recycled, this is unlikely to happen in the reasonably foreseeable future.²⁵⁸

213. Irretrievable impacts associated with the Project are related to construction activities. The use of aggregate, concrete, fuel, human labor, steel, water, wood, and other consumable resources is irretrievable.²⁵⁹

²⁵⁵ Application at 113.

²⁵⁶ Application at 113.

²⁵⁷ Minn. Stat. § 216I.05, subd. 11(b)(11).

²⁵⁸ Application at 114.

²⁵⁹ Application at 114.

H. Cumulative Potential Effects

214. Cumulative potential effects are defined as the “effect on the environment that results from the incremental effects of a project in addition to other projects in the environmentally relevant area that might reasonably be expected to affect the same environmental resources, including future projects actually planned or for which a basis of expectation has been laid, regardless of what person undertakes the other projects or what jurisdictions have authority over the projects.”²⁶⁰

215. The cumulative potential effects analysis considered the potential effects of other actions as described in relevant public documents. The scope of the cumulative potential effects analysis from local government units depends in part on the availability of comprehensive land use plans and information about other projects. For this assessment, other projects were identified from information publicly available from the City of Pine Island; Goodhue County; MnDOT; MISO; Commission; Federal Energy Regulatory Commission; and the Minnesota Environmental Quality Board.²⁶¹

216. Projects identified include the proposed Data Center Campus and the larger Project Skyway development site; US 52 highway improvements; the Mankato – Mississippi River Transmission Project; the Pleasant Valley – North Rochester – Hampton Transmission Project; Pleasant Valley – North Rochester Transmission Project; and the Gopher to Badger Link Transmission Project.²⁶²

217. The proposed Project and the other identified projects are anticipated to impact similar resources and have the following impacts: conversion of land use and land cover (i.e., agricultural land); construction-related noise; visual impacts from construction activities; construction-related traffic; criteria pollutant and GHG emissions from construction activities; soil compaction and erosion; and vegetation clearing.²⁶³

I. Use of or Paralleling of Existing Railroad and Highway Rights-of-Way, Survey and Division Lines, and Existing High-Voltage Transmission Rights-of-Way.

218. Minnesota’s transmission line routing factors require consideration of the Project’s use of or paralleling of existing right-of-way, survey lines, and natural division lines.²⁶⁴

219. For this Project, Xcel Energy will acquire a 150-foot-wide right-of-way for the proposed transmission line on both sides of US 52. On the west side of US 52,

²⁶⁰ Minn. R. 4410.0200, subd. 11(a).

²⁶¹ Application at 114.

²⁶² Application at 116-117.

²⁶³ Application at 117-118.

²⁶⁴ Minn. Stat. § 216I.05, subd. 3(7) and subd. 11(b)(8)-(9) & (e).

the proposed transmission line right-of-way is located along the south side and parallel to existing transmission line right-of-way for the CapX2020 Hampton – La Crosse 345 kV transmission line and the planned Mankato to Mississippi River 161 kV transmission line for 0.55 mile (45.8 percent) of its length.²⁶⁵

J. Electrical System Reliability

220. Minnesota’s transmission line routing factors require consideration of the Project’s impact on electrical system reliability.²⁶⁶

221. The Project is designed to provide additional transmission capacity to reliably serve the proposed four-building Data Center Campus.²⁶⁷

K. Costs of Constructing, Operating, and Maintaining the Facility

222. Minnesota’s transmission line routing factors require consideration of the Project’s cost of construction, operation, and maintenance.²⁶⁸

223. The Applicants estimate that the Project will cost between \$198 million and \$248 million to construct.²⁶⁹ The construction costs for the Project will be paid for by Google.²⁷⁰

224. Estimated operation and maintenance costs for the proposed transmission line are estimated to be approximately \$550/per mile each year and an additional \$400/per mile every four years for a ground patrol inspection.²⁷¹

225. Substations are designed to operate for decades and only require moderate maintenance. Maintenance in the first several years of operation is expected to be minimal.²⁷²

XVII. ROUTE PERMIT CONDITIONS

226. The Draft Route Permit, filed as part of the Commission’s August 14, 2026 Order, includes standard route permit conditions and four special permit conditions specific to the Project.²⁷³

²⁶⁵ Application at 14 and 37.

²⁶⁶ Minn. Stat. § 216I.05, subd. 11(b)(13).

²⁶⁷ Application at 5.

²⁶⁸ Minn. Stat. § 216I.05, subd. 3(b)(9).

²⁶⁹ Application at 25.

²⁷⁰ Application at 25.

²⁷¹ Application at 21.

²⁷² Application at 22 and 24.

²⁷³ ORDER (Aug. 14, 2026) (eDocket No. [20268-235391-01](#)).

227. In comments filed on September 3, 2026, the Applicants proposed revisions to Special Conditions 6.1 and 6.2 of the Draft Route Permit to reflect Project-specific details.²⁷⁴

228. Special Condition 6.1 requires that all approvals necessary for construction of the Project Skyway Data Center be obtained before construction of the Project may begin.²⁷⁵ The Applicants proposed revising the condition to clarify that only the approvals necessary to construct at least one data center building must be obtained before construction of the Project can commence. Specifically, the revised condition would state: “The Permittees may not begin construction of the Transmission Facility until all required local, state, and federal approvals necessary to build at least one data center building for the Project Skyway Data Center have been obtained. The Permittees must file documentation of these approvals 14 days prior to the pre-construction meeting for the Transmission Facility.”²⁷⁶ The Applicants explained that the proposed revision is needed because the Data Center Campus will be developed, permitted, and constructed in phases and not all buildings will be constructed at the same time.²⁷⁷ The revised condition continues to ensure that necessary approvals for at least one data center building are obtained before construction of the Project begins. This clarification is reasonable and supported by the record.

229. Special Condition 6.2 prohibits tree removal from June 1 through August 15.²⁷⁸ The Applicants proposed to add the language “to the extent practicable” into Special Condition 6.2. The Applicants stated that while they will endeavor to complete any necessary tree clearing outside of the June 1 through August 15 timeframe, there may be limited circumstances where tree clearing will need to occur during this timeframe due to construction scheduling, system outage requirements, or other unforeseen Project constraints.²⁷⁹ The proposed revision is supported by the record and would provide reasonable flexibility while still maintaining the objective of minimizing impacts to nesting bird species and bats.

XVIII. NOTICE

230. Minnesota statutes and rules require an applicant to provide certain notices to the public and local governments regarding a route permit process.²⁸⁰

²⁷⁴ Applicants’ Proposed Modifications to Draft Route Permit (Sept. 3, 2026) (eDocket No. [20269-236109-01](#)).

²⁷⁵ ORDER at Draft Route Permit Section 6.1 (Aug. 14, 2026) (eDocket No. [20268-235391-01](#)).

²⁷⁶ Applicants’ Proposed Modifications to Draft Route Permit at 1 (Sept. 3, 2026) (eDocket No. [20269-236109-01](#)).

²⁷⁷ Applicants’ Proposed Modifications to Draft Route Permit at 1 (Sept. 3, 2026) (eDocket No. [20269-236109-01](#)).

²⁷⁸ Order at Draft Route Permit Section 6.2 (Aug. 14, 2026) (eDocket No. [20268-235391-01](#)).

²⁷⁹ Applicants’ Proposed Modifications to Draft Route Permit at 2 (Sept. 3, 2026) (eDocket No. [20269-236109-01](#)).

²⁸⁰ Minn. Stat. § 216I.05, subd. 5.

231. The Applicants provided notice to the public and local governments in satisfaction of Minnesota statutory and rule requirements.²⁸¹

232. PUC-EIP staff likewise provided notices in satisfaction of Minnesota statutes and rules.²⁸²

XIV. ENVIRONMENTAL ASSESSMENT

233. Under the Standard Review process, the applicant prepares an EA and files the EA with the route permit application.²⁸³ The EA “must (1) contain information regarding the proposed project's human and environmental impacts, and (2) address mitigating measures for identified impacts.”²⁸⁴

234. The Applicants prepared an EA and submitted it with the Application.²⁸⁵

235. On July 24, 2026, and following the June 15 and 16, 2026, public information and scoping meetings, Commission Staff submitted briefing papers recommending that the Commission not require an EA addendum for the Project.²⁸⁶

236. On August 14, 2026, the Commission issued an order finding that an EA addendum is not required for the Project.²⁸⁷

237. The evidence in the record demonstrates that the EA is adequate and contains the information required by Minn. Stat. § 216I.05, subd. 4 and § 216I.07, subd. 3.

238. Minnesota law requires the Commission to consider the EA and the entirety of the record related to human and environmental impacts when making a final decision on a route permit application.²⁸⁸

Based on the foregoing Findings of Fact and the record in this proceeding, the Commission makes the following:

²⁸¹ Application at 119-123 and Appendix C.

²⁸² Notice of Complete Route Permit Application and Public Meeting Information Meetings (June 2, 2026) (eDocket No. [20266-232380-01](#)); Affidavit of Publication – Newspaper Notice of Complete Route Permit Application and Public Information Meetings (July 7, 2026) (eDocket No. [20267-233843-01](#)); Notice of Public Hearings and Availability of Draft Permit (August 31, 2026) (eDocket No. [20268-235904-01](#)); Affidavit of Publication and Newspaper Notice (Sept. 11, 2026) (eDocket No. [20269-236318-01](#)).

²⁸³ Minn. Stat. § 216I.07, subd. 3.

²⁸⁴ Minn. Stat. § 216I.07, subd. 3(a).

²⁸⁵ Application at Section 6.

²⁸⁶ August 6, 2026, Briefing Papers (July 24, 2026) (eDocket No. [20267-234572-01](#)).

²⁸⁷ ORDER (Aug. 14, 2026) (eDocket No. [20268-235391-01](#)).

²⁸⁸ Minn. Stat. § 216I.07, subd. 3(b).

CONCLUSIONS OF LAW

1. Any of the foregoing Findings of Fact more properly designated as Conclusions of Law are hereby adopted as such.
2. The Commission has jurisdiction to consider the Application.
3. The Commission determined that the Application was substantially complete and accepted the Application on May 12, 2026.²⁸⁹
4. The Applicants have prepared an appropriate EA of the Project for purposes of this proceeding, and which satisfies the requirements of Minn. Stat. §§ 216I.05, subd. 4, and 216I.07, subd. 3. The Commission has considered the EA and the entirety of the record related to human and environmental impacts as required by Minn. Stat. § 216I.07, subd. 3(b).
5. The Commission appropriately concluded that no addendum to the EA should be prepared.
6. The Applicants and the Commission gave notice as required by Minn. Stat. Ch. 216I.
7. A public hearing was conducted near the Proposed Route. Proper notice of the public hearing was provided, as required by Minn. Stat. §§ 216I.05, subd. 9, and 216I.07, subd. 4, and the public was given the opportunity to speak at the hearing and to submit written comments. All procedural requirements for the Route Permit were met.
8. The EA and the evidence in the record demonstrates that the Proposed Route is consistent with the Route Permit factors set forth in Minn. Stat. § 216I.05, subd. 11.
9. There is no feasible and prudent alternative to the construction of the Project, and the Project is consistent with and reasonably required for the promotion of public health and welfare in light of the state's concern for the protection of its air, water, land, and other natural resources as expressed in the Minnesota Environmental Rights Act and the Minnesota Environmental Policy Act.
10. The evidence in the record demonstrates that the Proposed Route is the best route for the Project.
11. The evidence in the record demonstrates that the Route Permit conditions included in the Draft Route Permit are appropriate for the Project, with the revisions discussed in Section XVII above.

²⁸⁹ Application Completeness Determination (May 12, 2026) (eDocket No. [20265-231699-01](#)).

12. Any of the foregoing Conclusions of Law, which are more properly designated Findings of Fact, are hereby adopted as such.

A. Written Public Comments

1. On September 3, 2026, Roxanne Voigt submitted a comment recommending that approval of the Project should be delayed until the litigation regarding the Data Center Campus is resolved.¹

2. On September 14, 2026, Aubree Derksen submitted a comment noting concerns regarding the confidentiality of the Energy Supply Agreement and Data Center Campus energy demand information, arguing that the use of trade secret designations limits transparency and prevents meaningful public review. The commenter also questioned whether ratepayers could ultimately bear costs associated with infrastructure constructed to serve large data center customers.²

3. On September 14, 2026, Aubree Derksen filed a comment asserting that the Project and the proposed Data Center Campus are interconnected and should be evaluated together. The commenter contended that the Data Center Campus includes four Google data center buildings and argued that approvals should not be granted until litigation concerning Project Skyway is resolved. The commenter further requested that the Commission deny the Route Permit based on uncertainty regarding the ultimate scope of the Data Center Campus development.³

4. On September 15, 2026, Maranda Oeltjen submitted a comment opposing issuance of the Route Permit, citing concerns about ongoing litigation involving Project Skyway, proposed modifications to tree-clearing restrictions, visual impacts associated with the transmission facilities, and potential noise and lighting impacts from the Data Center Campus.⁴

5. On September 17, 2026, Trevor Scrabeck expressed opposition to the proposed Data Center Campus and the Project. The commenter raised concerns regarding potential effects of the Project on property values, greenhouse gas emissions, and energy consumption associated with the proposed Data Center Campus. The commenter also argued that construction of the Project should not proceed until all approvals for Project Skyway Data Center Campus have been obtained.⁵

6. On September 20, 2026, Rodney Lanners filed a comment questioning whether ratepayers will pay the costs associated with transmission infrastructure, including proposed 765 kV transmission lines, that he claims are being developed to support future data center load growth. He requested greater transparency regarding

¹ Comment by Roxann Voigt (Sept. 3, 2026) (eDocket No. [20269-2326071-01](#)).

² Comment by Aubree Derksen (Sept. 14, 2026) (eDocket No. [20269-236365-01](#)).

³ Comment by Aubree Derksen (Sept. 14, 2026) (eDocket No. [20269-236364-01](#)).

⁴ Comment by Maranda Oeltjen (Sept. 15, 2026) (eDocket No. [20269-236436-01](#)).

⁵ Comment by Trevor Scrabeck (Sept. 17, 2026) (eDocket No. [20269-236549-01](#)).

responsibility for infrastructure costs and argued that large data center customers should bear an appropriate share of those costs.⁶

7. On September 20, 2026, Aubree Derksen expressed concern about whether communications about the Project were consistent between the Applicants, local governments, and Ryan Companies. The commenter also expressed concern that the Environmental Assessment and proposed mitigation measures inadequately address agricultural and residential impacts. The commenter specifically criticized provisions of the Agricultural Impact Mitigation Plan as vague, expressed concerns regarding landowner protections and monitoring provisions, and requested additional specificity regarding restoration and long-term environmental impacts.⁷

8. On September 24, 2026, David Derksen recommended the Commission deny the requested Route Permit out of concern that the Project is oversized relative to the currently proposed Data Center Campus. The commenter also requested greater transparency into the final number of data center buildings that the Project will support.⁸

9. On September 25, 2026, Ginger Fride submitted a comment in opposition to the Project because of potential impacts to groundwater resources.⁹

10. On September 28, 2026, Elizabeth Dunens expressed opposition to the Project and the proposed Data Center Campus because of general public opposition to data centers and potential aesthetic impacts.¹⁰ The commenter requested additional public engagement before approval of the Project.

B. Pine Island Public Hearing Comments

11. Aubree Derksen recommended that the Applicants' proposed modifications to Route Permit Special Conditions 6.1 and 6.2 be denied. The commenter also inquired about when the Applicants began the Project development process and additional details about the proposed Data Center Campus.¹¹

⁶ Comment by Rodney Lanners (Sept. 20, 2026) (eDocket No. [20269-236626-01](#)).

⁷ Comment by Aubree Derksen (Sept. 20, 2026) (eDocket No. [20269-236616-01](#)).

⁸ Comment by David Derksen (Sept. 24, 2026) (eDocket No. [20269-236787-01](#)).

⁹ Comment by Ginger Fride (Sept. 25, 2026) (eDocket No. [20269-236842-01](#)).

¹⁰ Comment by Elizabeth Dunens (Sept. 28, 2026) (eDocket No. [20269-236825-01](#)).

¹¹ September 14, 2026, Pine Island Public Hearing Transcript at 20:12-24:21 and 37:25-54:10 (Sept. 28, 2026) (eDocket No. [20269-236827-01](#)).

12. David Derksen sought clarification on the number of substations and the number of transmission line terminations within the North Rochester Substation that the Applicants are seeking to construct as part of the Project.¹²

13. Rodney Lanners inquired about the total megawatts of electricity required for the proposed Data Center Campus and the proposed substations. The commenter also sought clarification on the financial impacts on residential customers as a result of the Project and other transmission projects that will interconnect into the North Rochester Substation.¹³

C. Virtual Public Hearing Comments

14. Aubree Derksen inquired about the environmental justice section of the Environmental Assessment and sought clarification on proposed future transmission projects that may interconnect at the North Rochester Substation.¹⁴ The commenter also recommended air quality monitors for any proposed back-up generators at the Data Center Campus.

¹² September 14, 2026, Pine Island Public Hearing Transcript at 25:1-27:13 (Sept. 28, 2026) (eDocket No. 20269-236827-01).

¹³ September 14, 2026, Pine Island Public Hearing Transcript at 28:1-37:17 (Sept. 28, 2026) (eDocket No. 20269-236827-01).

¹⁴ September 15, 2026, Virtual Public Hearing Transcript at 24:18-36:12 (Sept. 28, 2026) (eDocket No. 20269-236827-02).

IN THE MATTER OF THE APPLICATION
FOR A ROUTE PERMIT FOR NORTH
ROCHESTER TO SKYWAY HIGH
VOLTAGE TRANSMISSION LINE
PROJECT

MPUC Docket No. E002/TL-26-135
CAH Docket No. 24-2500-42002

CERTIFICATE OF SERVICE

Gustav Gerhardson certifies that on the 2nd day of October 2026, on behalf of Northern States Power Company, doing business as Xcel Energy, and Echo Zone LLC, a subsidiary of Google LLC, he filed a true and correct copy of the **Applicants' Response to Hearing Comments and Proposed Findings of Fact, Conclusions of Law, and Recommendation** via [eDockets](#). Said document was also served via electronic service or U.S. Mail as designated on the attached Official Service List on file with the Minnesota Public Utilities Commission in the above-referenced docket.

/s/ Gustav Gerhardson
Gustav Gerhardson

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Victor	Barreiro	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	26-135 Official CC Service List
2	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	26-135 Official CC Service List
3	Matthew	Bock	matt.boch@kutakrock.com	Kutak Rock		124 West Capitol Avenue, Suite 2000 Little Rock AR, 72201 United States	Electronic Service		No	26-135 Official CC Service List
4	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	26-135 Official CC Service List
5	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	26-135 Official CC Service List
6	Samantha	Bump	samantha.bump@state.mn.us		Department of Natural Resources	500 Lafayette Rd, Box 25 Division of Ecological & Water Resources Saint Paul MN, 55155-4025 United States	Electronic Service		No	26-135 Official CC Service List
7	Kristien	Butler	kristien.butler@state.mn.us		Office of Administrative Hearings	PO Box 64620 Saint Paul MN, 55164 United States	Electronic Service		Yes	26-135 Official CC Service List
8	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 600 St. Paul MN, 55101 United States	Electronic Service		Yes	26-135 Official CC Service List
9	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	26-135 Official CC Service List
10	Ellen	Heine	ellen.l.heine@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MP-8 Minneapolis MN, 55401 United States	Electronic Service		No	26-135 Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
11	Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S. Eighth Street Minneapolis MN, 55402 United States	Electronic Service		No	26-135 Official CC Service List
12	Stacy	Kotch Egstad	stacy.kotch@state.mn.us		MINNESOTA DEPARTMENT OF TRANSPORTATION	395 John Ireland Blvd. St. Paul MN, 55155 United States	Electronic Service		No	26-135 Official CC Service List
13	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	26-135 Official CC Service List
14	Shantal	Pai	spai@fredlaw.com	Fredrikson & Byron, PA		60 S 6th Street, Minneapolis, MN 55407 Minneapolis MN, 55417-1208 United States	Electronic Service		No	26-135 Official CC Service List
15	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	26-135 Official CC Service List
16	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix & Associates		7400 Lyndale Avenue South Suite 190 Richfield MN, 55423 United States	Electronic Service		Yes	26-135 Official CC Service List
17	Lauren	Steinhaeuser	lauren.steinhaeuser@xcelenergy.com	Northern States Power Company dba Xcel Energy		414 Nicollet Mall, 401-08 Minneapolis MN, 55401 United States	Electronic Service		No	26-135 Official CC Service List