



414 Nicollet Mall
Minneapolis, MN 55401

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October 6, 2022

—Via Electronic Filing—

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

RE: 2022 SOLAR AND SOLAR-PLUS-STORAGE REQUEST FOR PROPOSALS
XCEL ENERGY SELF-BUILD PROPOSAL – SHERCO SOLAR III
DOCKET NO. E002/M-22-403

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits this Petition for Approval of our 150 MW self-build Sherco Solar III Project to the Minnesota Public Utilities Commission (Commission) in response to the 2022 Solar and Solar-Plus-Storage Request For Proposals (RFP) and pursuant to the requirements outlined in Commission's April 15, 2022 Order on our 2020-2034 Upper Midwest Integrated Resource Plan (IRP).

With this Petition, the Company aims to advance in our clean energy transition at a reasonable cost while building upon the extensive experience we have gained with our approved 460 MW Sherco Solar Project. The 150 MW Sherco Solar III Project will help reduce carbon emissions, meet our approved resource needs, reutilize valuable interconnection rights, create well-paying union construction jobs, and deliver important economic benefits to the City of Clear Lake, Clear Lake Township, and other surrounding communities.

In accordance with the Commission-approved Modified Track 2 acquisition process, the Company's self-build team submitted our self-build proposal – including Project description, pricing and implementation schedule – before any

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other RFP bid submissions. Given the Project’s many benefits outlined in this Petition, the Company respectfully requests that the Commission approve the Project should it be selected in the RFP process.

Portions of this filing, including Attachments A and B to this filing, are marked “NOT PUBLIC” as they contain information the Company considers to be trade secret data as defined by Minn. Stat. §13.37(1)(b). This data includes confidential pricing and other contract terms that is particularly sensitive and highly confidential for the next 24 hours as bid submissions from other parties are completed and submitted to the RFP Evaluation Team. This information has independent economic value from not being generally known to, and not being readily ascertainable by, other parties who could obtain economic value from its disclosure or use. We have marked additional information as “NOT PUBLIC” trade secret because the knowledge of such information in conjunction with public information in our filing also adversely impact future contract negotiations, potentially increasing costs for these services for our customers. Thus, the Company maintains this information as a trade secret.

Attachments A and B are marked as “Non-Public” in their entirety. Pursuant to Minnesota Rule 7829.0500, subp. 3, we provide the following description of the excised material:

Attachment A:

1. **Nature of the Material:** Xcel Energy’s confidential self-build bid submission spreadsheet in response to the Company’s 2022 Solar and Solar-Plus-Storage Request for Proposals.
2. **Authors:** Xcel Energy – Energy Supply.
3. **Importance:** The spreadsheet contains the Company’s confidential bid information for the proposed self-build Sherco Solar III Project.
4. **Date the Information was Prepared:** Q3 2022.

Attachment B:

1. **Nature of the Material:** The proposed map for the Company’s self-build Sherco Solar III Project.
2. **Authors:** Xcel Energy – Siting & Land Rights.
3. **Importance:** The files contain confidential information about the Company’s proposed self-build Sherco Solar III Project.
4. **Date the Information was Prepared:** Q3 2022.

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We have electronically filed this document with the Commission, and copies have been served on the parties on the attached service list. Please contact me at bria.e.shea@xcelenergy.com or Aaron Tinjum at aaron.j.tinjum@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

BRIA E. SHEA

REGIONAL VICE PRESIDENT, REGULATORY POLICY

Enclosures

c: Service List

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STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie Sieben	Chair
Joseph K. Sullivan	Vice-Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
John Tuma	Commissioner

IN THE MATTER OF THE PETITION OF
NORTHERN STATES POWER COMPANY
FOR APPROVAL OF A SELF-BUILD SOLAR
PROJECT PROPOSAL – SHERCO SOLAR III

DOCKET NO. E002/M-22-403

PETITION

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits this Petition for Approval of our self-build 150 MW Sherco Solar III Project (Project) in response to the 2022 Solar and Solar-Plus-Storage Request for Proposals (RFP) and pursuant to Appendix A, Section III, part (d) of the Minnesota Public Utilities Commission's (Commission) April 15, 2022 Order on our 2020-2034 Upper Midwest Integrated Resource Plan (IRP). The Company respectfully requests that the Commission approve the Project should it be selected as part of the RFP process.

EXECUTIVE SUMMARY

As discussed in our IRP proceeding, we expect to add a significant amount of renewable energy to our Upper Midwest system in the next 15 years. By 2030, we anticipate more than half of the electricity we deliver to our Minnesota customers will come directly from renewable resources. Consistent with this plan, in the Commission's Order on our IRP, we were required to acquire approximately 1,320 megawatts (MW) of solar generation by 2026. The Commission also approved the Company's need for approximately 600 MW of solar and 2,150 MW of wind, or an equivalent amount of energy and capacity, from a combination of wind, solar and/or storage, between 2027 and 2032.¹

¹ Minnesota Public Utilities Commission, Order on Xcel Energy's 2020-2034 Upper Midwest Integrated Resource Plan (Docket No. E002/RP-19-368), Order Points 2.A.5.A, 2.A.5.B, and 2.A.8, pages 30-31, April 15, 2022.

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To meet the first tranche of these approved resource needs, the Company's RFP Evaluation team issued an RFP on August 1, 2022 – which was first outlined in our July 20, 2022 Informational Filing – seeking 900 megawatts (MW) of solar or solar-plus-storage hybrid resources to come online by the end of 2025.² This RFP process will not only procure cost-competitive solar and/or solar-plus-storage projects for our customers, but will also demonstrate the competitiveness of our self-build proposal – and the approved 460 MW Sherco Solar Project – with the latest solar market data.

The RFP bids are due on October 7, 2022.³ To ensure transparency and fairness during the RFP process – and consistent with other past Modified Track 2 acquisition processes – the Company is submitting our self-build proposal with the Project's details and an estimate of final costs one day before the Company's RFP Evaluation team receives the incoming RFP bids from all other potential developers.

With this Petition, the Company is pleased to present a self-build Sherco Solar III Project to develop 150 MWac of solar photovoltaic (PV) capacity near the existing Sherco facility site. This Project builds directly upon the significant experience we have gained with our approved 460 MW Sherco Solar Project (Sherco Solar I & II) and will deliver significant customer and system benefits by further reducing carbon emissions, using existing interconnection and transmission rights, creating hundreds of new well-paying union construction jobs, and adding significant amounts of clean energy generation to our system. Furthermore, the Project continues the Company's track record of working closely with our community partners: the Project is supported by both the City of Clear Lake and Clear Lake Township.

In short, we believe our self-build Proposal will deliver substantial benefits to our customers and the communities we serve. These include:

- *Customer Value:* Over the Project's life, Sherco Solar III will offer significant system cost savings to our customers and aligns with our strategy of having a balance of Company-owned and PPA renewable energy resources. The modelling from our IRP identified a need to add 1,320 MW of solar resources by 2026 and this Project will fill a portion of that need. Similar to Sherco Solar

² Xcel Energy, Informational Compliance Filing (Docket No. E002/M-22-403), page 2, July 20, 2022.

³ As discussed in the Company's July 20, 2022 Informational Filing in this docket, RFP proposals were initially due to be submitted by 5:00 pm (CT) on September 30, 2022. However, in a September 1, 2022 update posted on the NSP RFP Documents section of the RFP website, the deadline for bid submissions was extended to October 7, 2022, making the Company's bid due one day before all other submissions on October 6, 2022 at 5:00 pm (CT).

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I and II, production at this facility will also replace more expensive fossil fuel generation on our system or purchases in the MISO wholesale market.

- *Alignment with State Energy Policy Goals:* The addition of Sherco Solar III, along with our other planned renewable energy resource additions, will ensure the Company continues to comply with state energy policies, including Minnesota's Renewable Energy Standard (RES) and overarching goal of an 80 percent reduction in carbon emissions by 2050 – all in a cost-effective manner.
- *Societal & Economic Benefits:* Sherco Solar III will generate significant and lasting economic benefits for our communities and state. These include: low-cost clean energy to meet our customers' needs, payments to local landowners, the creation of hundreds of construction jobs, ongoing maintenance jobs, workforce development and training opportunities for workers in underserved communities through the Company's PowerUp program, and the contribution of tax revenues and other fees for our communities and state.
- *Environmental Benefits:* The addition of Sherco Solar III will enable the Company to continue advancing in our clean energy transition and meet our overarching corporate goal of achieving 100% carbon-free electricity by 2050. It will also be developed in a manner that both protects and supports the local ecosystem. Sherco Solar III will produce enough clean energy to power approximately 30,000 homes in the Upper Midwest each year.

In the balance of this Petition, we:

- Provide a description of the Company's self-build proposal;
- Provide an overview of the Project's estimated costs;
- Outline the Project's anticipated implementation schedule; and
- Request Commission approval of the Project should it be selected in the RFP.

Our bid spreadsheet, which provides specific responses to the RFP and was included with our bid submission, is provided as Attachment A. A detailed map of the Project's location is provided as Attachment B.

I. SUMMARY OF FILING

A one-paragraph summary is attached to this filing pursuant to Minn. R. 7829.1300, subp. 1.

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II. SERVICE ON OTHER PARTIES

Pursuant to Minn. R. 7829.1300, subp. 2, the Company has served a copy of this filing on the Office of the Attorney General – Residential Utilities Division. A summary of the filing has been served on all parties on the enclosed service list.

III. GENERAL FILING INFORMATION

Pursuant to Minn. R. 7829.1300, subp. 3, the Company provides the following information.

A. Name, Address, and Telephone Number of Utility

Northern States Power Company doing business as:
Xcel Energy
414 Nicollet Mall
Minneapolis, MN 55401
(612) 330-5500

B. Name, Address, and Telephone Number of Utility Attorney

Shubha Harris
Principal Attorney
Xcel Energy
414 Nicollet Mall, 401 – 8th Floor
Minneapolis, MN 55401
(612) 215-4517

C. Date of Filing

The date of this filing is October 6, 2022.

D. Statute Controlling Schedule for Processing the Filing

This filing is made pursuant to Minn. Stat. § 216B.2422, subd. 5, which provides an exemption from the Certificate of Need statute (Minn. Stat. § 216B.243) for resources selected through a bidding process approved or established by the Commission. No specific statute controls the timeframe for processing this filing. The processing is therefore controlled by the Commission's rules on Miscellaneous Filings, Minn. R.

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7829.1300 and 7829.1400. We have included the information required under Minn. R. 7829.1300, subp. 3 for miscellaneous filings that, like this one, are subject to specific content requirements. We also note that while Minn. R. 7829.1400, subps. 1 and 4 specify the time periods for initial and reply comments for miscellaneous filings; it has been the past practice of the Commission to set a comment schedule by notice to interested parties pursuant to Minn. R. 7829.1400, subp. 7.

E. Utility Employee Responsible for Filing

Bria E. Shea
Regional Vice President, Regulatory Policy
Xcel Energy
414 Nicollet Mall, 401 – 7th Floor
Minneapolis, MN 55401
(612) 330-6064

IV. MISCELLANEOUS INFORMATION

Pursuant to Minn. R. 7829.0700, the Company requests that the following persons be placed on the Commission's official service list for this proceeding:

Shubha Harris
Principal Attorney
Xcel Energy
414 Nicollet Mall, 401 – 8th Floor
Minneapolis, MN 55401
Shubha.m.harris@xcelenergy.com

Christine Schwartz
Regulatory Administrator
Xcel Energy
414 Nicollet Mall, 401 – 7th Floor
Minneapolis, MN 55401
regulatory.records@xcelenergy.com

Any information requests in this proceeding should be submitted to Ms. Schwartz at the Regulatory Records email address above.

V. DESCRIPTION AND PURPOSE OF FILING

A. Background

On April 15, 2022, in Docket No. E002/RP-19-368, the Minnesota Public Utilities Commission issued an Order approving the Company's 2020-2034 Upper Midwest Integrated Resource Plan with modifications and establishing requirements for future filings (the IRP Order). Among other things, the IRP Order required:

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By 2026 Xcel shall acquire –

- A) Approximately 720 MW of company-owned solar-powered generation to fully reutilize the interconnection capacity to be made available following the retirement of Sherco Unit 2 (460 MW of which could come from the proposed Sherco Solar project if approved by the Commission) and
- B) An additional 600 MW of solar-powered generation unconstrained by interconnection location or ownership.⁴

In the IRP Order, the Commission also set forth the manner by which the Company is authorized to acquire these resources. Specifically, Order Point 6.A required the Company to “use the No-Bid/Track 1 and Xcel-Bid Auditor/Modified Track 2 bidding processes for the solar, wind, and storage resources approved in Ordering Paragraph 2[.]” Resources selected by the Company using these bid processes to meet the need identified in the IRP Order satisfy Minn. Stat. 216B.2422, Subd. 5, which states that “A utility may select resources to meet its projected energy demand through a bidding process approved or established by the commission.” In Appendix A, Section III of the IRP Order, the Commission set forth specific details regarding the Modified Track 2 process it approved for renewable resource acquisitions:

- A. The Commission issues a resource plan order identifying the size, type, and timing of the resource needs.
- B. Xcel issues its request for proposals.
- C. Early in the process (preferably with the filing of the company’s self-build proposal, discussed below) Xcel files a contingency plan to address the potential for the bidding process to fail.
- D. The day before Xcel receives responses to that request for proposals, Xcel submits its self-build project petition. This petition contains an estimate of final costs for the project and other project details necessary to evaluate the proposal in accordance with the identified selection factors.
- E. After receiving bids in response to the request for proposals, Xcel evaluates the bids and select projects for contract

⁴ Minnesota Public Utilities Commission, Order on Xcel Energy’s 2020-2034 Upper Midwest Integrated Resource Plan (Docket No. E002/RP-19-368), Order Point 2.5.A-B, page 31, April 15, 2022.

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negotiation that are in the best interest of its customers. Xcel evaluates the bids using a number of factors, such as –

1. Levelized cost,
2. Financial capability,
3. Project schedule,
4. Project design,
5. Project risks,
6. MISO queue position status,
7. Interconnection and network upgrades,
8. Energy production profile,
9. Site control,
10. Project output delivery plan,
11. Expected turbine availability,
12. Pricing options,
13. Project development milestones,
14. Exceptions to standard contract terms and conditions, and
15. Other relevant factors.

Using these criteria, Xcel selects projects that are in the best interest of its customers and negotiates contracts with each of the developers.

- F. Xcel then makes a filing to the Commission that includes the contracts for projects selected from the request for proposals, as well as a comparison between those projects and Xcel's self-build proposal. The company includes a ranking and bid data for all bids received in response to the request for proposals and an analysis of the factors identified above for all projects for which Xcel conducts due diligence. Additionally, the company provides an independent third-party auditor report of its process for requesting proposals, which reviews the company's evaluation of proposals and due diligence, as well as the company's selection of proposals for contract negotiation.⁵

To meet the resource needs identified in the IRP Order, the Company's RFP Evaluation team issued an RFP on August 1, 2022 – which was first outlined in our

⁵ Minnesota Public Utilities Commission, Appendix A, Section III, page 4-5.

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July 20, 2022 Informational Filing – seeking 900 megawatts (MW) of solar or solar-plus-storage hybrid resources to come online by the end of 2025.⁶ Because the RFP is open to self-build proposals submitted by the Company, it is being run pursuant to the Modified Track 2 process. To date, the Company has strictly followed the requirements of this process. We have taken careful, deliberate steps internally to separate personnel working on the self-build proposal (the Self-Build team) and the RFP evaluation (the RFP Evaluation team) to avoid potential conflicts of interest. Members of each team have been instructed not to discuss or share non-public information related to either the RFP process or the self-build proposal with members of the opposite team. Information related to each team’s work is also being kept on separate SharePoint collaboration sites that are accessible only to members of the appropriate team. The Independent Auditor for the RFP process has reviewed and approved the team assignments and separation strategy. This internal firewall was also detailed in our July 20, 2022 Informational Filing and we will provide further documentation in the Company’s Petition for Approval of the selected project(s), which is expected to be filed in early 2023.

Additionally, as noted above, the Modified Track 2 process requires that, “early in the process (preferably with the filing of the company’s self-build proposal, discussed below) Xcel files a contingency plan to address the potential for the bidding process to fail.”⁷ We note that the Company submitted such a contingency plan early in the process as part of our July 20, 2022 Informational Filing as we believed it was most appropriate for such a plan to be developed and communicated by the Company’s RFP Evaluation team rather than the Self-Build team.

Finally, with this filing – made one day ahead of the bid deadline for the RFP – the Company is satisfying the requirement that “[t]he day before Xcel receives responses to that request for proposals, Xcel submits its self-build project petition. This Petition contains an estimate of final costs for the project and other project details necessary to evaluate the proposal in accordance with the identified selection factors.”

B. Project Description

The Company’s self-build Sherco Solar III Project proposal is a new, to-be-built 150MWac photovoltaic solar resource facility. It is located on land near the existing Sherco facility site. Sherco Solar III will be located to the west of Sherco Solar I and approximately five miles from that project’s collector substation. The Project would

⁶ Xcel Energy, Informational Compliance Filing (Docker No. E002/M-22-403), page 2, July 20, 2022.

⁷ Minnesota Public Utilities Commission, Appendix A, Section III, part C, page 5.

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add a new bay adjacent to the Sherco Solar I substation and use the same gen-tie line to deliver energy back to the Sherco Point of Interconnection (POI), which is shown in the Project's layout maps provided in Attachment B.

Altogether, the Project will include the installation of approximately 375,000 solar panels, approximately five miles of underground collection feeder lines, electrical collection systems, access roads, collector substations, and other supporting solar farm infrastructure.

C. Estimated Project Costs

Our self-build proposal estimates a total project capital cost of approximately **[PROTECTED DATA BEGINS PROTECTED DATA ENDS]**.⁸ Additionally, the Project is well-positioned to take advantage of the solar Production Tax Credits (PTCs) provisions included in the recently enacted Inflation Reduction Act (IRA). We expect the Project to qualify for **[PROTECTED DATA BEGINS**

PROTECTED DATA

ENDS]. As the Company has recently noted in other dockets, these estimates are dependent upon our current interpretation of IRS guidance and expectations regarding the PTC transfer market.

The Project's Net Capacity Factor (NCF) is expected to be **[PROTECTED DATA BEGINS PROTECTED DATA ENDS]**. The NCF was calculated by modelling the manufacturer's supplied equipment performance data in PVSyst using site-specific meteorological data gathered over a year-long meteorological campaign. The campaign specifically aimed to refine the commercially available, typical-year meteorological models for the Project's area. Our bid team analysis calculates the delivered energy at **[PROTECTED DATA BEGINS PROTECTED DATA ENDS]** per year once placed in-service.

Final information that pertains directly to the Project's costs – including annual energy output and the levelized cost of energy (LCOE) – will be calculated by the RFP Evaluation team as part of the bid selection process. If selected, that information would be included with the Company's Petition for Approval of any project(s) selected in the RFP, expected by early 2023.

⁸ With AFUDC, the Project's total capital cost is **[PROTECTED DATA BEGINS PROTECTED DATA ENDS]**.

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D. Implementation Schedule

Under the Project’s proposed implementation schedule, Sherco Solar III will achieve commercial operation no later than **[PROTECTED DATA BEGINS**

PROTECTED DATA ENDS]. After the submission of this Petition, our Self-Build team will continue to develop the Project towards construction and commissioning; we expect to begin initial engineering and procurement activities in 2022. Primary construction activities are planned to occur in 2024 and 2025. The implementation schedule envisions filing the Company’s Petition for Approval – as well as the Site Permit Application – by March 31, 2023, all of which is contingent on the timing of the RFP Evaluation team’s review and selection process.

The critical path to beginning field construction work is Commission approval of the Site and Route Permits, which we anticipate would take approximately 12 months based on similar past proceedings. During the permitting process, the Company would finalize procurement of the PV modules, inverters, and a Balance of Plant (BOP) Contractor (Contractor) to complete the final Engineering, Procurement, and Construction (EPC) of the Project. The Contractor will take the Project’s 10 percent engineering design and finalize the facility design pursuant to the Company’s technical specifications and scope of work and begin construction after the Site Permit is approved and issued. The Contractor will also procure any remaining plant equipment that is necessary and execute sub-contractor agreements.

Throughout the Project’s development, the Company’s Self-Build team would manage our Suppliers and Contractors to ensure compliance with contracts and delivery of a quality asset. The Company’s Self-Build team would also be responsible for related reporting requirements, including reporting on the total number of union jobs, certified diverse suppliers, and participation from the Company’s workforce training and development initiative, the PowerUp program.

CONCLUSION

With this self-build proposal, the Company aims to advance in our clean energy transition at a reasonable cost while building upon the extensive experience we have gained with our approved 460 MW Sherco Solar Project. The 150 MW Sherco Solar III Project will help reduce carbon emissions, meet our approved resource needs, reutilize valuable interconnection rights, create well-paying union construction jobs, and deliver important economic benefits to the City of Clear Lake, Clear Lake

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Township, and other surrounding communities. In compliance with the Modified Track 2 Process approved in the Commission's Order on our IRP, the Company's Self-Build team submitted our proposal and pricing before any other RFP bid submissions. Given the Project's many benefits outlined in this Petition, the Company respectfully requests that the Commission:

- Approve the Company's acquisition of the 150 MW self-build Sherco III Solar Project if it is selected as part of the 2022 Solar and Solar-Plus-Storage RFP.

As outlined in the Company's July 22, 2022 Informational Filing, the Company will submit a petition for Commission approval that reflects the results of the RFP process sometime in early 2023.

Dated: October 6, 2022

Northern States Power Company

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie Sieben	Chair
Joseph K. Sullivan	Vice-Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
John Tuma	Commissioner

IN THE MATTER OF THE PETITION OF
NORTHERN STATES POWER COMPANY
FOR APPROVAL OF A SELF-BUILD SOLAR
PROJECT PROPOSAL – SHERCO SOLAR III

DOCKET NO. E002/M-22-403

PETITION

SUMMARY OF FILING

Please take notice that on October 6, 2022, Northern States Power Company doing business as Xcel Energy filed with the Minnesota Public Utilities Commission a Petition requesting Commission approval of the Company's 150 MW self-build Sherco Solar III Project should it be selected as part of the 2022 Solar or Solar-Plus-Storage Request for Proposals.

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Attachment A:

1. **Nature of the Material:** Xcel Energy’s confidential self-build bid submission spreadsheet in response to the Company’s 2022 Solar and Solar-Plus-Storage Request for Proposals.
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3. **Importance:** The spreadsheet contains the Company’s confidential bid information for the proposed self-build Sherco Solar III Project.
4. **Date the Information was Prepared:** Q3 2022.

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Attachment B:

1. **Nature of the Material:** The proposed map for the Company’s self-build Sherco Solar III Project.
2. **Authors:** Xcel Energy – Siting & Land Rights.
3. **Importance:** The files contain confidential information about the Company’s proposed self-build Sherco Solar III Project.
4. **Date the Information was Prepared:** Q3 2022.

CERTIFICATE OF SERVICE

I, Christine Schwartz, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

Docket No. E002/M-22-403

Dated this 6th day of October 2022

/s/

Christine Schwartz
Regulatory Administrator

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ross	Abbey	ross.abbey@us-solar.com	United States Solar Corp.	100 North 6th St Ste 222C Minneapolis, MN 55403	Electronic Service	No	OFF_SL_22-403_M-22-403
Gary	Ambach	Gambach@slipstreaminc.org	Slipstream, Inc.	8973 SW Village Loop Chanhassen, MN 55317	Electronic Service	No	OFF_SL_22-403_M-22-403
Ellen	Anderson	eanderson@mncenter.org	Minnesota Center for Environmental Advocacy	1919 University Ave W Ste 515 Saint Paul, MN 55104	Electronic Service	No	OFF_SL_22-403_M-22-403
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121	Electronic Service	No	OFF_SL_22-403_M-22-403
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Jessica L	Bayles	Jessica.Bayles@stoel.com	Stoel Rives LLP	1150 18th St NW Ste 325 Washington, DC 20036	Electronic Service	No	OFF_SL_22-403_M-22-403
David	Bender	dbender@earthjustice.org	Earthjustice	1001 G Street NW Suite 1000 Washington, District of Columbia 20001	Electronic Service	No	OFF_SL_22-403_M-22-403
Tracy	Bertram	tbertram@ci.becker.mn.us		12060 Sherburne Ave Becker City Hall Becker, MN 55308-4694	Electronic Service	No	OFF_SL_22-403_M-22-403
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-403_M-22-403
Jessica	Beyer	jbeyer@greatermankato.com	Greater Mankato Growth	1961 Premier Dr Ste 100 Mankato, MN 56001	Electronic Service	No	OFF_SL_22-403_M-22-403

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
James	Canaday	james.canaday@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota St. St. Paul, MN 55101	Electronic Service	No	OFF_SL_22-403_M-22-403
Thomas	Carlson	thomas.carlson@edf-re.com	EDF Renewable Energy	10 2nd St NE Ste. 400 Minneapolis, Minnesota 55413	Electronic Service	No	OFF_SL_22-403_M-22-403
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St, Louis, MO 63119-2044	Electronic Service	No	OFF_SL_22-403_M-22-403
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_22-403_M-22-403
Jean	Comstock	jean.comstock.dbcc@gmail.com	St. Paul 350	729 6th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_22-403_M-22-403
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-403_M-22-403
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_22-403_M-22-403
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_22-403_M-22-403
Ian M.	Dobson	ian.m.dobson@xcelenergy.com	Xcel Energy	414 Nicollet Mall, 401-8 Minneapolis, MN 55401	Electronic Service	Yes	OFF_SL_22-403_M-22-403
J.	Drake Hamilton	hamilton@fresh-energy.org	Fresh Energy	408 St Peter St Ste 350 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_22-403_M-22-403

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Droske	christopher.droske@minneapolismn.gov	City of Minneapolis	661 5th Ave N Minneapolis, MN 55405	Electronic Service	No	OFF_SL_22-403_M-22-403
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_22-403_M-22-403
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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