



Minnesota Pollution Control Agency

520 Lafayette Road North | St. Paul, Minnesota 55155-4194 | 651-296-6300

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RECEIVED
2013 NOV 28 PM 2:44
ADMINISTRATIVE
HEARINGS

November 22, 2013

The Honorable Eric L. Lipman
Office of Administrative Hearings
P.O. Box 64620
600 North Robert Street
St. Paul, MN 55164-0620

Re: Xcel Competitive Resources Acquisition Proposals
PUC Docket Number: E-002/CN-12-1240

Dear Judge Lipman:

Thank you for the opportunity to review and comment on the Xcel Competitive Resources Acquisition Proposals project (Project), a review of proposed energy resource alternatives located in various counties throughout Minnesota. Regarding matters for which the Minnesota Pollution Control Agency (MPCA) has regulatory responsibility and other interests, the MPCA staff has the following comments for your consideration.

4.10 Air Quality

Regarding the State Implementation Plan and criteria pollutants, please note that some of the proposed alternatives would have to do Prevention of Significant Deterioration (PSD) permitting/modeling, and those located in the Twin Cities Metro Area with larger criteria pollutant emissions would want to be mindful of the fact that it is a sulfur dioxide (SO₂) maintenance area if/when required to conduct PSD modeling and be sure to appropriately account for nearby sources.

Appendix C

Regarding Calpine Corporations table of Required Permits and Approvals provided in Appendix C, please note that the total Project area of disturbance requiring a National Pollutant Discharge Elimination System/State Disposal System Construction Stormwater Permit from the MPCA is one acre or more of land, not five acres as stated in the table. Information regarding the MPCA's Construction Stormwater Program can be found on the MPCA's website at:

<http://www.pca.state.mn.us/water/stormwater/stormwater-c.html>. Questions regarding Construction Stormwater Permit requirements should be directed to Roberta Getman at 507-206-2629.

Please be aware that this letter does not constitute approval by the MPCA of any or all elements of the Project for the purpose of pending or future permit action(s) by the MPCA. Ultimately, it is the

The Honorable Eric L. Lipman

Page 2

November 22, 2013

responsibility of the Project proposer to secure any required permits and to comply with any requisite permit conditions. If you have any questions concerning our review of this project, please contact Karen Kromar of my staff by email at karen.kromar@state.mn.us or by telephone at 651-757-2508.

Sincerely,

Karen Kromar for

Craig Affeldt
Supervisor
Environmental Review Unit
Resource Management and Assistance Division

CA:bt

cc: Karen Kromar, MPCA, St. Paul
Doug Wetzstein, MPCA, St. Paul
Bob Finley, MPCA, Mankato



RECEIVED
2013 NOV 22 AM 7:44
ADMINISTRATIVE
HEARINGS

November 12, 2013

The Honorable Eric L. Lipman
Office of Administrative Hearings
P.O. Box 64620
600 North Robert Street
St. Paul MN 55164-0620

RE: Comment on Xcel Energy's Petition Seek Approval for a Competitive Resource Acquisition Proposal.

Docket E-002/CN-12-1240
OAH 8-2500-30760

Dear Mr. Eric Lipman,

The City of Dodge Center is writing to express its support for Geronimo Energy's 100 MW Solar Project.

As a host for one of the solar sites, at 6.5 MW, Dodge Center supports and encourages the development of clean energy projects. The solar installations will bring economic growth and opportunity to our city through construction and permanent operation jobs. The solar installations will also utilize the local economy and workforce during on-going operations. Overall, the Aurora project will create an estimated 800 construction jobs and 30 permanent jobs. The site will continue to provide long term positive economic impacts to the area.

The solar project will diversify the state's energy generation mix and while supplying the grid with a fixed cost clean energy resource.

The City Council gives our support for the Aurora Solar Project.

Sincerely,

Bill Ketchum
Mayor

Lee A. Mattson
City Administrator

Julie A. Beth
Finance Director

Bill Ketchum
Mayor



Carver County Community Development Agency

RECEIVED
2013 NOV 25 AM 7:55
ADMINISTRATIVE
HEARINGS

November 15, 2013

The Honorable Eric L. Lipman
Office of Administrative Hearings
600 Robert Street North
P.O. Box 64620
St. Paul, MN 55154-0620

RE: Letter of Support for Geronimo's Aurora Solar Project
Public Utilities Commission (PUC) Docket Number: E-002/CN-12-1240
Office of Administrative Hearings (OAH) Docket Number: 8-2500-30760

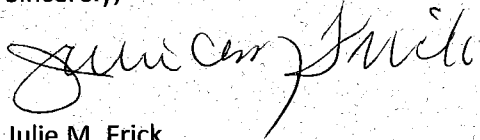
The Carver County Community Development Agency (CDA) would like to offer its full support for Geronimo's Aurora Solar Project currently being considered for Xcel Energy's Competitive Resources Acquisition Proposal. The 100 MW Aurora Solar Project is the only solar project being considered for the Competitive Resource Acquisition Proposal. This proposed project will bring jobs, revenue, new tax base and clean energy opportunities for Carver County and its residents. This proposal is also consistent with the Carver County CDA and Carver County Board of Commissioners Strategic Growth Plans that have goals of providing enhanced economic development opportunities and clean energy into Carver County.

The project, as proposed not only provides benefits to Carver County, but to at least 18 other counties in our region. The project is a key green energy partnership across the area and includes at least 30 sites. It will generate up to 100 MW for Xcel Energy. With solar arrays located throughout the 18 counties in the service region, the Aurora Solar project will do the following:

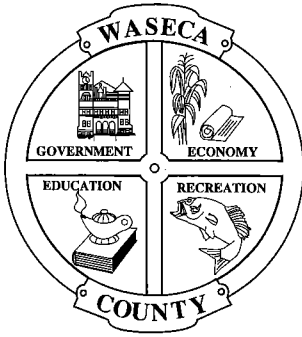
- Bring energy to the grid effectively while protecting the environment
- Bring over \$250 million of new investment into the 18 county project area
- Interconnect to multiple Xcel Energy substations across Minnesota and South Dakota providing energy and capacity for the local distribution network
- Deliver benefits such as a reduction in line loss, the elimination of transmission costs, provide geographic distribution of generation assets, and provide a cost effective alternative to fossil fuels
- Create approximately 800 construction jobs over the 18 county project area and 30 long term permanent jobs. For the Carver County solar site, that translates into approximately 50 construction jobs and 3 full time jobs after project completion (December 1, 2016)
- Create a financial benefit for the 18 county project area. Approximately \$20,000 per year in production tax revenue yields are anticipated for the Carver site alone, with approximately 80% of the revenue going to Carver County and 20% going to the Township

If you have any questions, or need additional information, please do not hesitate to call me or my Director of Economic Development, John Sullivan at (952) 448-7715. Thank you for the opportunity to comment on this project.

Sincerely,

A handwritten signature in cursive script, appearing to read "Julie M. Frick". The signature is written in black ink and is positioned above the printed name.

Julie M. Frick
Executive Director



STATE OF MINNESOTA
COUNTY OF WASECA

Board of County Commissioners

307 NORTH STATE STREET
WASECA, MINNESOTA 56093

November 19, 2013

Attention: The Honorable Eric L. Lipman
Office of Administrative Hearings
600 North Robert Street
St. Paul, MN 55164-0620

RECEIVED
2013 NOV 25 AM 7:48
ADMINISTRATIVE
HEARINGS

RE: Letter of Support for Geronimo Energy's Aurora Solar Project
Public Utilities Commission (PUC) Docket Number: E-002/CN-12-1240
Office of Administrative Hearings (OAH) Docket Number: 8-2500-30760

Based upon the information provided to date by representatives of Geronimo Energy, the Waseca County Board of Commissioners would like to offer its support for the Aurora Solar Project currently being considered for Xcel Energy's Competitive Resource Acquisition Proposal. The 10 MW facility under consideration for Waseca County as part of the 100 MW Aurora Solar Project is exciting for our county to consider because we believe it will:

- 1) Provide many construction jobs to the area during the 2015 construction season;
- 2) Generate opportunities for permanent employment in Waseca County;
- 3) Contribute an estimated \$24,000 per year in taxes (as proposed by Geronimo Energy) to be split between Waseca County and St. Mary Township;
- 4) Provide a source of low-impact, green energy to our area;
- 5) Include provisions by Geronimo Energy to convert the property back to agriculture or another appropriate use when the project has exceeded its useful life.

Geronimo Energy has indicated its commitment to meeting local, state and federal concerns and to comply with local, state, and federal codes during the construction and operation of the facility.

It is our opinion that the Aurora project is extremely important to Minnesota as the first large solar project of its kind in the state. The Public Utilities Commission should strongly favor this type of project because it is a good source of renewable energy that will have little negative impact environmentally to the areas it serves.

The Waseca County Board lends it support to the Aurora Project based upon the verbal commitment of Geronimo Energy to meet the needs and concerns of our county.

Sincerely,

A handwritten signature in black ink, appearing to read 'Daniel D. Kuhns', is written over a horizontal line.

Daniel D. Kuhns
Waseca County Board Chairman

507-835-0630 • FAX 507-835-0633

www.co.waseca.mn.us

"An Equal Opportunity Employer"

Youness, Rachel (OAH)

From: Tegdesch, Elizabeth (MPCA)
Sent: Friday, November 22, 2013 11:15 AM
To: *OAH_Ratecomments.oah
Cc: Kromar, Karen (MPCA); Affeldt, Craig (MPCA); Wetzstein, Doug (MPCA); Finley, Robert (MPCA)
Subject: MPCA Comment Letter - Xcel Competitive Resources Acquisition Proposals

Attached are the Minnesota Pollution Control Agency's comments on the Xcel Competitive Resources Acquisition Proposals project. A paper copy will follow by U.S. mail.

Please acknowledge receipt of this comment letter to Karen Kromar at karen.kromar@state.mn.us

Thank you.



Xcel Competitive
Resources Acq...

Elizabeth Tegdesch
Environmental Review and EQB Support
Minnesota Pollution Control Agency
520 Lafayette Road N
St. Paul, MN 55155 / 651-757-2100
elizabeth.tegdesch@state.mn.us



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November 22, 2013

The Honorable Eric L. Lipman
Office of Administrative Hearings
P.O. Box 64620
600 North Robert Street
St. Paul, MN 55164-0620

Re: Xcel Competitive Resources Acquisition Proposals
PUC Docket Number: E-002/CN-12-1240

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The Honorable Eric L. Lipman

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November 22, 2013

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Sincerely,

Karen Kromar for

Craig Affeldt
Supervisor
Environmental Review Unit
Resource Management and Assistance Division

CA:bt

cc: Karen Kromar, MPCA, St. Paul
Doug Wetzstein, MPCA, St. Paul
Bob Finley, MPCA, Mankato

Youness, Rachel (OAH)

From: Steinhauer, Suzanne (COMM)
Sent: Friday, November 22, 2013 1:34 PM
To: *OAH_Ratecomments.oah
Subject: 12-1240 USACE Comments from USACE
Attachments: 12-1240_USACE_ltr.pdf

Judge Lipman –

This is the only comment that I have received on the Environmental Report. A copy of the letter was submitted via eDockets, Document ID: **201311-93989**, but was not served on parties.

Please let me know if you have any questions.

Suzanne Steinhauer
Energy Environmental Review and Analysis
Minnesota Department of Commerce
85 7th Place East, Suite 500
Saint Paul, MN 55101
651-539-1843
suzanne.steinhauer@state.mn.us

Youness, Rachel (OAH)

From: Bill Heaney <BillHeaney@billheaney.com>
Sent: Friday, November 22, 2013 3:28 PM
To: *OAH_Ratecomments.oah
Subject: Docket E-022/CN-12-1240; OAH 8-2500-30760

To The Honorable Eric L. Lipman, Office of Administrative Hearings

Please accept our letter of support for the Geronimo Energy's Aurora Solar Project.

Bill Heaney
Legislative & Political Director
IBEW Minnesota State Council
940 - 44th Av NE, Unit 21067
Columbia Heights, MN 55421

651-270-1072

Youness, Rachel (OAH)

From: Joyce Anastasi <joyce.anastasi@gmail.com>
Sent: Friday, November 22, 2013 9:34 AM
To: *OAH_Ratecomments.oah
Subject: Geronimo Energy Solar Farms in Chisago County
Attachments: Letter of Support to PUC.docx

Attached please find my letter in support of solar farms in Chisago County.

Please contact me should there be any questions or problems with the document.

Thank you,

Joyce Anastasi

(651) 257-1916 (H)

(651) 470-8418 (C)

Joyce Anastasi
28196 Lakelawn Ct.
Lindstrom, MN 44045

November 21, 2013

The Honorable Eric L. Lipman
Office of Administrative Hearings
P.O. Box 64620
600 North Robert Street
St. Paul MN 55164-0620

RE: Comment on Xcel Energy's Petition Seek Approval for a Competitive Resource Acquisition Proposal.

Docket E-002/CN-12-1240
OAH 8-2500-30760

Dear Mr. Eric Lipman,

I am a Chisago County resident and I'm writing in support of proposed solar farm sites in Chisago County.

As you may know, Chisago County is home to many beautiful lakes *AND* much power grid capacity. Proposals for fossil fuel power plants have surfaced in the past and they pose a threat to our lakes in terms of pollution and especially in terms of ground water use for cooling. Many of our lakes are experiencing a decline in water levels, similar to White Bear Lake, which may be attributable to declining ground water. Solar power would provide a way to use our extra grid capacity (and gain tax revenue) without threatening our lakes.

The proposed solar farms would also take some land out of agricultural use and allow for planting of vegetation beneath and around the solar arrays. The land in our county is beautiful, but it isn't exactly prime farmland. The farms we do have contribute much sediment and pollution (especially phosphorus) to our lakes so every bit of land in this watershed which can be restored to more natural vegetation helps.

If Chisago County's abundant grid capacity is going to get used, let's do it with solar. It's not only the right thing to do for our lakes, it's the right thing for the environment in general. And doing the right thing for the environment means we are doing the right thing for future generations.

It's time for solar, especially in this environmentally sensitive area.

Sincerely,

Joyce Anastasi

Youness, Rachel (OAH)

From: Todd Schultz <Tschultz@ci.sauk-rapids.mn.us>
Sent: Friday, November 22, 2013 8:18 AM
To: *OAH_Ratecomments.oah
Subject: Docket No. E002/CN-12-1240
Attachments: SKMBT_C552D13112115351.pdf

Please add the attached document to the comments for Docket No. E002/CN-12-1240.

Thank you.

Todd Schultz
250 Summit Avenue North
Sauk Rapids, MN 56379
320.258.5315

Sauk Rapids *Minnesota*

November 21, 2013

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101

RE: In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy for Approval of Competitive Resource Acquisition Proposal and Certificate of Need Docket No. E002/CN-12-1240

Dear Mr. Haar:

The City of Sauk Rapids recently became aware of the Geronimo Energy Aurora Solar Project and is very concerned about the location and impacts that this location could have on the City and other local governments. The proposed location is a parcel that is within an orderly annexation area governed by a Joint Powers Agreement between the City of Sauk Rapids and Sauk Rapids Township. This parcel has been guided for single family development by the Sauk Rapids Comprehensive Plan and is one of the most logical extensions of residential development in the City.

This project will have a significant economic impact on area local governments. I have been told by representatives of Geronimo Energy that the parcel after build out, will generate approximately \$10,000 annually in local taxes. If this 36 acre site is developed with single family homes as intended, it will generate over \$250,000 annually in local taxes (2.8 homes per acre x 36 acres x \$2,500 annual tax). Based on taxes on a \$200,000 home, Benton County has the 6th highest tax rate in the State due to its poor tax capacity. This development will add to that disparity.

The project will be a significant impediment to the extension of utilities and will also prove to be an incompatible use with existing and planned uses on neighboring properties, negatively impacting development potential even more than the direct impacts on the subject property. The proposed site is just 1,400 feet from City services.

In addition, we are also concerned by the lack of notice for this project. We only became aware of it on November 12. We have been in contact with a staff person at the PUC who has assured us that nothing in this proceeding would prejudice Sauk Rapids ability fully to participate in any proceeding that might propose to put solar panels in this location.

CITY OF SAUK RAPIDS

250 Summit Avenue North • Sauk Rapids, MN 56379 • ph: 320.258.5300 • fax: 320.258.5359 • www.ci.sauk-rapids.mn.us

The City of Sauk Rapids does not discriminate on the basis of race, color, creed, religion, national origin, sex, disability, age, marital status, status with regard to public assistance, familial status, or sexual orientation.

This letter is not intended as support or opposition to the Aurora Solar Project in general, but we do oppose its proposed location in the Sauk Rapids City, Sauk Rapids Township Orderly Annexation Area.

If you have any questions, please feel free to contact me at your convenience.

Sincerely,

A handwritten signature in black ink, appearing to read 'Todd Schultz', written in a cursive style.

Todd Schultz
Development Director

Cc: Lonnie Wild, Sauk Rapids Township Chair

Youness, Rachel (OAH)

From: John Sullivan <JohnS@carvercda.org>
Sent: Thursday, November 21, 2013 3:34 PM
To: *OAH_Ratecomments.oah
Subject: Official Comment on Geronimo Energy Aurora Solar Project PUC Docket Number E-002/CN-12-1240 OAH Docket Number 8-2500-30760
Attachments: 11-15-13 Geronimo Energy Letter of Support.pdf

Attention: The Honorable Eric L. Lipton
Office of Administrative Hearings
600 North Robert Street
St. Paul, MN 55164-0620

Please see our comments attached in the letter of support. Thank you for the opportunity to comment.

Best Regards,



Carver County Community Development Agency

JOHN SULLIVAN

Director of Economic Development

705 N Walnut Street

Chaska, MN 55318

JohnS@CarverCDA.org

Office: 952-556-2789 | Fax: 952-448-6506



Carver County Community Development Agency

November 15, 2013

The Honorable Eric L. Lipman
Office of Administrative Hearings
600 Robert Street North
P.O. Box 64620
St. Paul, MN 55154-0620

RE: Letter of Support for Geronimo's Aurora Solar Project
Public Utilities Commission (PUC) Docket Number: E-002/CN-12-1240
Office of Administrative Hearings (OAH) Docket Number: 8-2500-30760

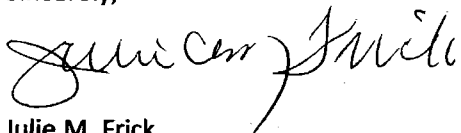
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If you have any questions, or need additional information, please do not hesitate to call me or my Director of Economic Development, John Sullivan at (952) 448-7715. Thank you for the opportunity to comment on this project.

Sincerely,

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Julie M. Frick
Executive Director