

November 20, 2017

Mr. Daniel Wolf, Executive Secretary
Minnesota Public Utilities Commission
350 Metro Square Building
121 East Seventh Place
St. Paul, MN 55101-2147

Via electronic filing

RE: In the Matter of the Xcel Energy's Renewable Development Fund (RDF) Annual report,
Tracker Account Tune-up, and Request for 2018 Rider Factor

Docket No. E-002/M-17-712

Dear Mr. Wolf:

The purpose of this letter is to provide comments in response of the above-referenced docket. Specifically, my comments relate to the changes which have occurred in public plans for the Central Riverfront since RDF funds were approved for the Crown Hydro Project and why good public and fiscal policy dictates terminating any further RDF funding.

The last twenty years have been a critical time for the St. Anthony Falls Historic District and the Central Riverfront. Significant public investments have been followed by major private investments to re-orient the land uses adjacent the riverfront and provide greatly enhanced public access. Broad partnerships secured the Stone Arch Bridge for public use, connected the West River Parkway across formerly private land, created Mill Ruins Park by removing industrial in-fill, facilitated the creation of the Mill City Museum, and helped create the St. Anthony Falls Heritage Trail. Some industrial uses have remained an element of the riverfront experience, such as the Xcel Energy Water Power Park, the University of Minnesota's St. Anthony Falls Laboratory, and the Southeast Steam Plant.

For over 25 years I have been selected by my peers on the County Board to be the County's representative on the St. Anthony Falls Heritage Board (SAFHB), a legislatively created body composed of 22 members including representatives of Hennepin County, City of Minneapolis, Minneapolis Park and Recreation Board, Minnesota State Legislature, Minnesota Historical Society, State Historic Preservation Office, Minneapolis Heritage Preservation Commission and Hennepin History Museum. Many of the aforementioned developments, as well as numerous others, have been funded, guided or spurred by the SAFHB. During much of this period the SAFHB has followed the Crown Hydro Project. Importantly, for purposes of these comments, the SAFHB has observed how new plans and project proposals for the St. Anthony Falls Historic

District have made the Crown Hydro Project an impediment to the future development of the District as presently contemplated.

The attached Resolution, entitled Crown Hydroelectric Power Resolution, and dated November 20, 2017, sets out the current position of the SAFHB relative to the Crown Hydro Project and its opposition to further use of RDF funds for the Project. In particular, the Resolution points out how other projects, already developed, have accomplished much of what was foreseen as the educational benefits of the Crown Hydro Project. Additionally, the Resolution notes how the Crown Hydro Project would interfere with numerous currently planned projects for the Central Riverfront, some of which are now underway. As a member of the SAFHB, I voted in favor of the Resolution.

My personal view is that completion of the Crown Hydro Project would be a step backward for public access to the use and enjoyment of the Mississippi Riverfront within the St. Anthony Falls Historic District. As the character of the riverfront has changed, so have the expectations of public use and access. The Crown Hydro Project simply fails to meet current expectations. Accordingly, it should no longer be the beneficiary of a decision made years ago to award RDF funds to assist in its development, particularly when it is an impediment to more newly conceived projects which are moving forward with strong public-private support.

Thank you very much.

Sincerely,

A handwritten signature in black ink that reads "Peter McLaughlin" followed by a stylized initial "WR".

Peter McLaughlin
Hennepin County Commissioner
A-2400 Government Center
300 South 6th Street
Minneapolis, MN 55487

cc: Nancy Lange Chair
Dan Lipschultz Vice Chair
Matt Schuerger Commissioner
John Tuma Commissioner
Katie Sieben Commissioner

CROWN HYDROELECTRIC POWER RESOLUTION

St. Anthony Falls Heritage Board

November 20, 2017

WHEREAS, the Minnesota Legislature in 1988 created the St. Anthony Falls Heritage Zone and St. Anthony Falls Heritage Board (Minnesota Statutes, Chapter 138.761-766) for the purpose of providing interpretive resources for the public within the St. Anthony Falls Heritage Zone encircling the Minneapolis central riverfront, an area rich in natural, scenic, recreational and historic elements; and

WHEREAS, The Heritage Board consists of 22 members, including representatives from the City of Minneapolis, Minneapolis Park and Recreation Board, Hennepin County, Minnesota Historical Society, Minneapolis Heritage Preservation Commission, Minnesota State Historic Preservation Office, Minnesota State Legislature, and Hennepin History Museum; and

WHEREAS, the Heritage Board has funded, guided, and spurred many initiatives and interpretive efforts along the Minneapolis Riverfront; and

WHEREAS, since the creation of the Heritage Zone and Heritage Board, partner members of the Heritage Board and others in the public and private sectors have worked diligently to create a series of destinations within the Heritage Zone for the public to enjoy while learning about Minnesota's past; and

WHEREAS, the proposed Crown Hydroelectric (Crown Hydro) project is located in the St. Anthony Falls Historic District, a National Register Historic District as defined by the U.S. Secretary of the Interior; and

WHEREAS, Crown Hydro was awarded a Renewable Development Grant in November 2001, partly based on factors such as economic development and interpretation of water power; and

WHEREAS, the riverfront redevelopment Crown Hydro was to have spurred has occurred independent of and without any help from that project; and

WHEREAS, interpretation of water power at the Falls has been accomplished by the Minnesota Historical Society at Mill City Museum and tours of the Pillsbury A Mill and Hennepin Island Hydroelectric Plant, and with interpretive panels in Water Power Park and Mill Ruins Park; and

WHEREAS, a small hydroelectric installation at the Falls that may have been a cost-effective renewable energy project in 2001 may no longer be the most cost-effective renewable energy project; and

WHEREAS, the Crown Hydro Project will interfere with other Central Riverfront projects such as Water Works Park, now in the design phase and soon to be under construction, the proposed repurposing of the Upper St. Anthony Lock and Dam as a visitor and interpretive center, and plans for a kayak trail; and

WHEREAS, Crown Hydro lacks the site control to operate its proposed hydroelectric plant; and

WHEREAS, electric generating facilities often are required to be surrounded by elaborate security measures that, in this instance, could restrict visitor access to educational and recreational opportunities on the riverfront that public investment has opened up;

THEREFORE, BE IT RESOLVED, that the St. Anthony Falls Heritage Board urges the Minnesota Public Utilities Commission (PUC) to consider the potential harm that the Crown Hydro project could cause for the state-supported interpretive mission of the member organizations of the St. Anthony Falls Heritage Board and to use the Renewable Development Grant awarded to Crown Hydro in November 2001 for other more cost-effective projects.