

November 17, 2021

VIA ELECTRONIC FILING

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
Saint Paul, MN 55101-2147

Re: **In the Matter of the Application of Xcel Energy for a Route Permit for the West 345 kV transmission line for the Sherco Solar Project in Sherburne County.
Docket No. E-002/TL-21-189**

**In the Matter of the Application of Xcel Energy for a Route Permit for the East 345 kV transmission line for the Sherco Solar Project in Sherburne County.
Docket No. E-002/TL-21-190**

**In the Matter of the Application of Xcel Energy for a Site Permit for the up to 460 MW Sherco Solar Project in Sherburne County.
Docket No. E-002/GS-21-191**

Contiguous Parcel Analysis

Dear Mr. Seuffert:

On November 12, 2021, the Minnesota Public Utilities Commission (“Commission”) met to consider the action it should take regarding site and route alternatives to be evaluated by the Minnesota Department of Commerce Energy Environmental Review Analysis unit (“EERA”) in the environmental assessment (“EA”) for the up to 460 megawatt Sherco Solar Energy Generating System and Associated 345 Kilovolt transmission lines in Sherburne County, Minnesota (“Project”). The Commission determined, in part, that the EA prepared by EERA should consider “[l]and contiguous to the East or West Blocks owned by present participating landowners north and west of the West Block and south, east and west of the East Block, if any. These are to be studied as possible replacements for the parcels of concern identified by the City of Becker, provided the landowners agree to participate in the Project using such parcels, and the parcels do not conflict with other permitting or environmental constraints as identified by the applicant by December 1, 2021.”

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Northern States Power Company, doing business as Xcel Energy (“Xcel Energy”) completed a review of the eastern (“East Block”) and western (“West Block”) sections of the Project to identify contiguous parcels to the north and west of the West Block and south, east and west of the East Block that are also owned by landowners already participating in the Project. Ownership information was determined using Sherburne County real property records.¹ This analysis was intended to determine if any contiguous parcels should be studied in the EA. No suitable parcels were identified by Xcel Energy. Therefore, no parcels contiguous to the Project need to be studied by EERA in the EA. The results of the analysis are noted below.

Project West Block

No contiguous parcels to the north or west of the West Block are owned by a currently participating landowner. Of particular note, contiguous lands to the north of the West Block are owned by trusts in the name of Glenn and Kathleen Goenner (“Goenner Trusts”). These parcels are not owned by the participating landowner, Kevin Goenner. Moreover, National Grid Renewables Development LLC (“NGR”) pursued voluntary lease agreements with the Goenner Trusts for these contiguous parcels prior to initiating the site permit process and the Goenner Trusts elected to not participate in the Project. Accordingly, neither the Goenner Trust parcels nor any other contiguous parcels to the north or west of the West Block should be studied in the EA.

Project East Block

No contiguous parcels to the east or west of the East Block are owned by a currently participating landowner, except for Xcel Energy-owned property within the City of Becker (Figure 1). Xcel Energy also owns contiguous land to the south of the East Block that is currently leased to and used by the University of Minnesota as the Sand Plain Research Farm (“SPRF”).² A portion of these parcels are also within a Minnesota Wild and Scenic River zoning district, a zoning district where the construction of large energy generating plants, such as the Project, is prohibited.³

Xcel Energy-owned property west of and contiguous to the East Block is not appropriate for inclusion in the Project and should not be studied by the EA. This land is located within the City of Becker and is currently occupied by the existing Sherco Generating Station. The City has made it clear in its comments that it would like additional land studied so that the Project would not interfere with the City’s desired expansion. Moreover, portions of the Sherco Generating Station are located on these parcels and will continue to be used by Xcel Energy until the Sherco Generating Station completely ceases operation in the future. Therefore, Xcel Energy-owned property west of and contiguous to the East Block is not suitable for inclusion in the Project and should not be studied in the EA.

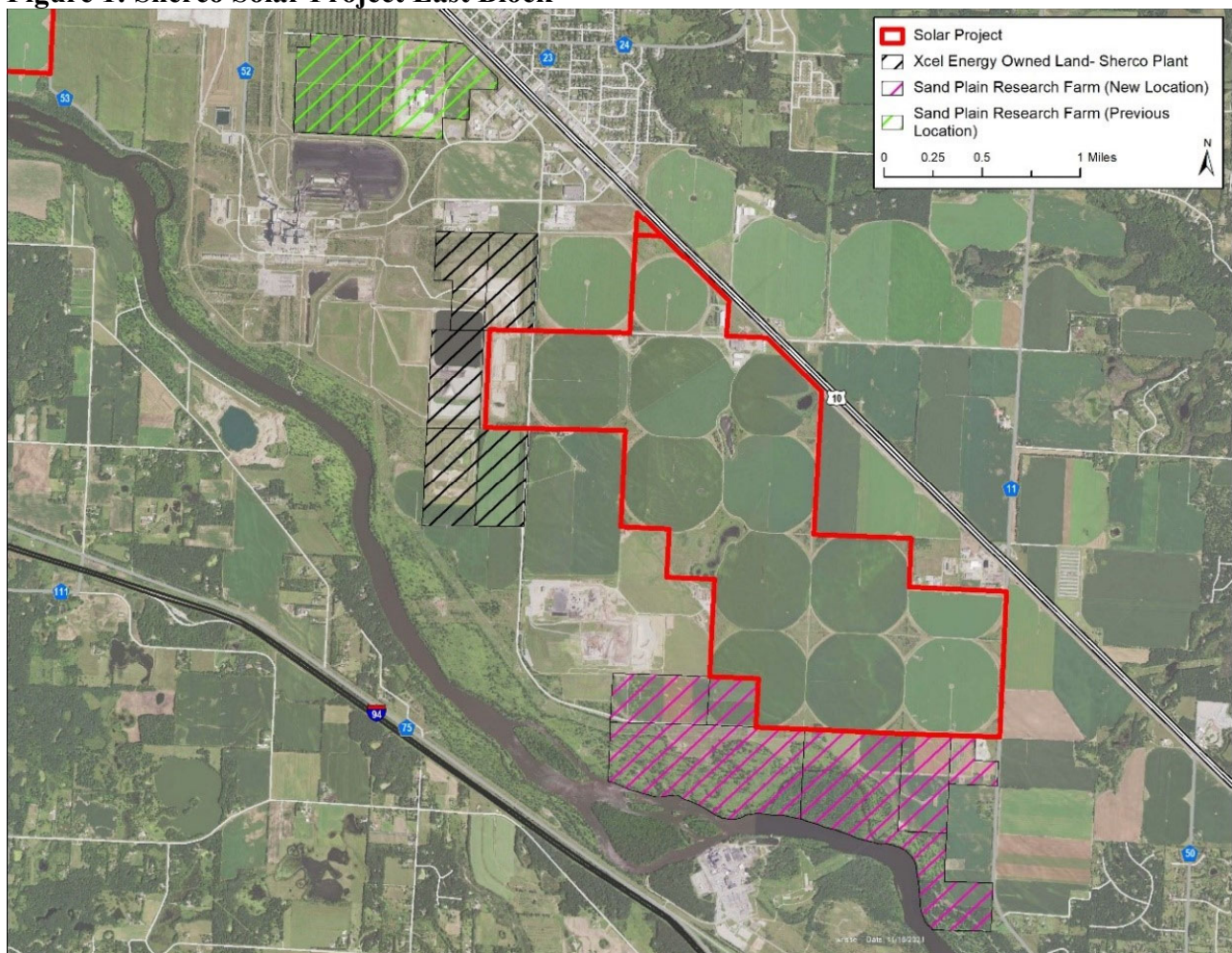
¹ See <https://beacon.schneidercorp.com/Application.aspx?AppID=133&LayerID=1600&PageTypeID=1&PageID=903>
Accessed on November 12, 2021

² <https://sprf.cfans.umn.edu/>

³ See M. Rule 7850.4400 Subp. 1(G)

Xcel Energy-owned property to the south of and contiguous with the Project is currently leased to the University of Minnesota and is designated as an agricultural research station. Xcel Energy and the University of Minnesota recently relocated the SPRF from its previous location within the City of Becker, north of the Sherco Generating Station, to its current location south of the East Block of the Project. Specifically, the SPRF was moved to allow the area it previously occupied to be made available for sale as part of the City and Xcel Energy's economic development efforts and business park expansion. Accordingly, the parcels on which the SPRF is located should not be studied in the EA.

Figure 1: Sherco Solar Project East Block



In summary, Xcel Energy completed the analysis required by the Commission. No parcels satisfied the Commission's selection criteria as outlined above. Therefore, no parcels contiguous to the Project need to be studied by EERA in the EA.

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Sincerely,

Fredrikson & Byron, P.A.
Attorneys for National Grid Renewables Development LLC

/s/ Jeremy P. Duehr

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Certificate of Service

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Breann L. Jurek certifies that on the 17th day of November 2021, she e-filed on behalf of Northern States Power Company, doing business as Xcel Energy true and correct copies of the following documents:

1. Xcel Energy's Contiguous Parcel Analysis Letter; and
2. Certificate of Service.

A copy has also been served on the individuals listed on the attached service lists.

Executed on: November 17, 2021

Signed: /s/ Breann L. Jurek

Fredrikson & Byron, P.A.
200 South Sixth Street
Suite 4000
Minneapolis, MN 55401

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Aaron	Brixius	Aaron.P.Brixius@xcelenergy.com	Xcel Energy	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-189_Official Service List
Jordan	Burmeister	jordan@nationalgridrenewables.com	National Grid Renewables Development, LLC	8400 Normandale Boulevard Suite 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_21-189_Official Service List
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_21-189_Official Service List
Jeremy	Duehr	jduehr@fredlaw.com	Fredrikson & Byron, P.A.	200 South Sixth Street Suite 4000 Minneapolis, Minnesota 55402-1125	Electronic Service	No	OFF_SL_21-189_Official Service List
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_21-189_Official Service List
Lucas	Franco	lfranco@liunagroc.com	LIUNA	81 Little Canada Rd E Little Canada, MN 55117	Electronic Service	No	OFF_SL_21-189_Official Service List
Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY	401 Nicollet Mall FL 8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-189_Official Service List
Ellen	Heine	ellen.l.heine@xcelenergy.com	Xcel Energy	414 Nicollet Mall, MP-8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-189_Official Service List
Breann	Jurek	bjurek@fredlaw.com	Fredrikson & Byron PA	200 South Sixth St Ste 400 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-189_Official Service List
Ryan	Long	ryan.j.long@xcelenergy.com	Xcel Energy	414 Nicollet Mall 401 8th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-189_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Marie	Pflipsen	mpflipsen@ci.becker.mn.us	City of Becker	12060 Sherburne Avenue PO BOX 250 Becker, Minnesota 55308	Electronic Service	No	OFF_SL_21-189_Official Service List
Greg	Pruszinske	gpruszinske@ci.becker.mn.us	City of Becker	PO Box 250 12060 Sherburne Ave Becker, MN 55308	Electronic Service	No	OFF_SL_21-189_Official Service List
Victoria	Reinhardt	Victoria.Reinhardt@co.ramsey.mn.us	Partnership on Waste and Energy	Ramsey County Board Office 15 W. Kellogg Blvd., Ste. 220 St. Paul, MN 55102	Electronic Service	No	OFF_SL_21-189_Official Service List
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_21-189_Official Service List
William	Risse	wrisse@nationalgridrenewables.com	National Grid Renewables Development, LLC	8400 Normandale Blvd Ste 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_21-189_Official Service List
Melissa	Schmit	melissa@nationalgridrenewables.com	National Grid Renewables	8400 Normandale Lake Blvd Ste 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_21-189_Official Service List
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-189_Official Service List
William	Storm	bill.storm@state.mn.us	Department of Commerce	Room 500 85 7th Place East St. Paul, MN 551012198	Electronic Service	No	OFF_SL_21-189_Official Service List
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	Yes	OFF_SL_21-189_Official Service List

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Haley	Waller Pitts	hwallerpitts@fredlaw.com	Fredrikson & Byron, P.A.	200 S 6th St Ste 4000 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-189_Official Service List

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Marie	Pflipsen	mpflipsen@ci.becker.mn.us	City of Becker	12060 Sherburne Avenue PO BOX 250 Becker, Minnesota 55308	Electronic Service	No	OFF_SL_21-190_Official Service List
Greg	Pruszinske	gpruszinske@ci.becker.mn.us	City of Becker	PO Box 250 12060 Sherburne Ave Becker, MN 55308	Electronic Service	No	OFF_SL_21-190_Official Service List
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Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-190_Official Service List
William	Storm	bill.storm@state.mn.us	Department of Commerce	Room 500 85 7th Place East St. Paul, MN 551012198	Electronic Service	No	OFF_SL_21-190_Official Service List
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