

December 14, 2021

Executive Secretary Will Seuffert  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East  
Suite 350  
Saint Paul, MN 55101-2147

RE: Sherco Solar Project in Sherburne County  
Public Utilities Commission Docket Number: E-002/GS-21-191

Dear Secretary Seuffert:

On behalf of Commissioner Petersen, Minnesota Department of Agriculture (MDA) appreciates the opportunity to provide comment on the Sherco Solar Project, proposed by Xcel Energy, in Sherburne County Minnesota.

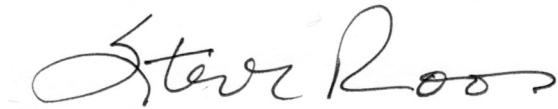
MDA's role in reviewing energy projects under the regulatory authority of the Public Utility Commission (PUC) is outlined in Minnesota Statutes 2020, section 216B.243, subdivision 7(b), which charges MDA with the responsibility of working with project applicants to prepare an Agricultural Impact Mitigation Plan (AIMP).

Xcel Energy, working with their consultant firm, Merjent, Inc, developed a draft AIMP and submitted it to MDA for review and comment. We completed our review and submitted comments and suggested revisions to the project applicant and Merjent for incorporation into a final version of the AIMP for this project. We have reviewed the final AIMP, as submitted in the docket, and conclude that our concerns were adequately addressed in the final AIMP with one exception. We wish to be clear that our definition of earthmoving activities extends to include any activity that poses the risk of mixing topsoil with subsoils – including grading activities, trenching, boring, and/or excavation for foundations, etc. These activities require inspection by an independent 3<sup>rd</sup> party Environmental Monitor as described in the final AIMP submitted to the docket.

MDA thanks you for the opportunity to submit these comments on the AIMP for the Sherco Solar project in Sherburne County Minnesota. We also wish to thank the project proposers and Merjent for their collaborative approach to working with us.

If you have any questions about MDA's comments please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Stephan Roos". The signature is fluid and cursive, with the first name "Stephan" and last name "Roos" clearly distinguishable.

Stephan Roos  
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Energy and Environment Section  
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cc: Commissioner Thom Petersen, MDA  
Bob Patton, MDA  
Bret Eknes, Minnesota Public Utilities Commission  
Louise Miltich, Minnesota Department of Commerce  
Bill Storm, Minnesota Department of Commerce