

April 14, 2022

VIA ELECTRONIC FILING

The Honorable Kimberly Middendorf
Office of Administrative Hearings
600 North Robert Street
P.O. Box 64620
Saint Paul, MN 55164-0620

**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**

OAH Docket Number: 21-2500-37959

Dear Judge Middendorf:

Northern States Power Company, doing business as Xcel Energy ("Xcel Energy"), submits the attached letter in response to a request from Department of Commerce Energy Environmental Review and Analysis ("EERA") staff. EERA staff requested that Xcel Energy provide additional information regarding possible design measures that could be utilized to accommodate the up to 460 megawatt alternating current solar energy project within the area proposed as Alternative 1A by Xcel Energy. Further discussion of Alternative 1A is included in the Direct Testimony of Aaron Brixius, which was e-filed on April 6, 2022 (eDocket ID No. 20224-184512-06, 20224-184512-12), and in the revised Schedule B to the Direct Testimony of Aaron Brixius, which was e-filed on April 7, 2022 (eDocket ID No. 20224-184551-02, 20224-184551-05).

This document has been e-filed today through www.edockets.state.mn.us. A copy of this filing is also being served upon the persons on the attached Official Service Lists of record. Please let me know if you have any questions regarding this filing.

Sincerely,

FREDRIKSON & BYRON, P.A.
ATTORNEYS FOR NG RENEWABLES

/s/ Jeremy P. Duehr

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/s/ Haley L. Waller Pitts

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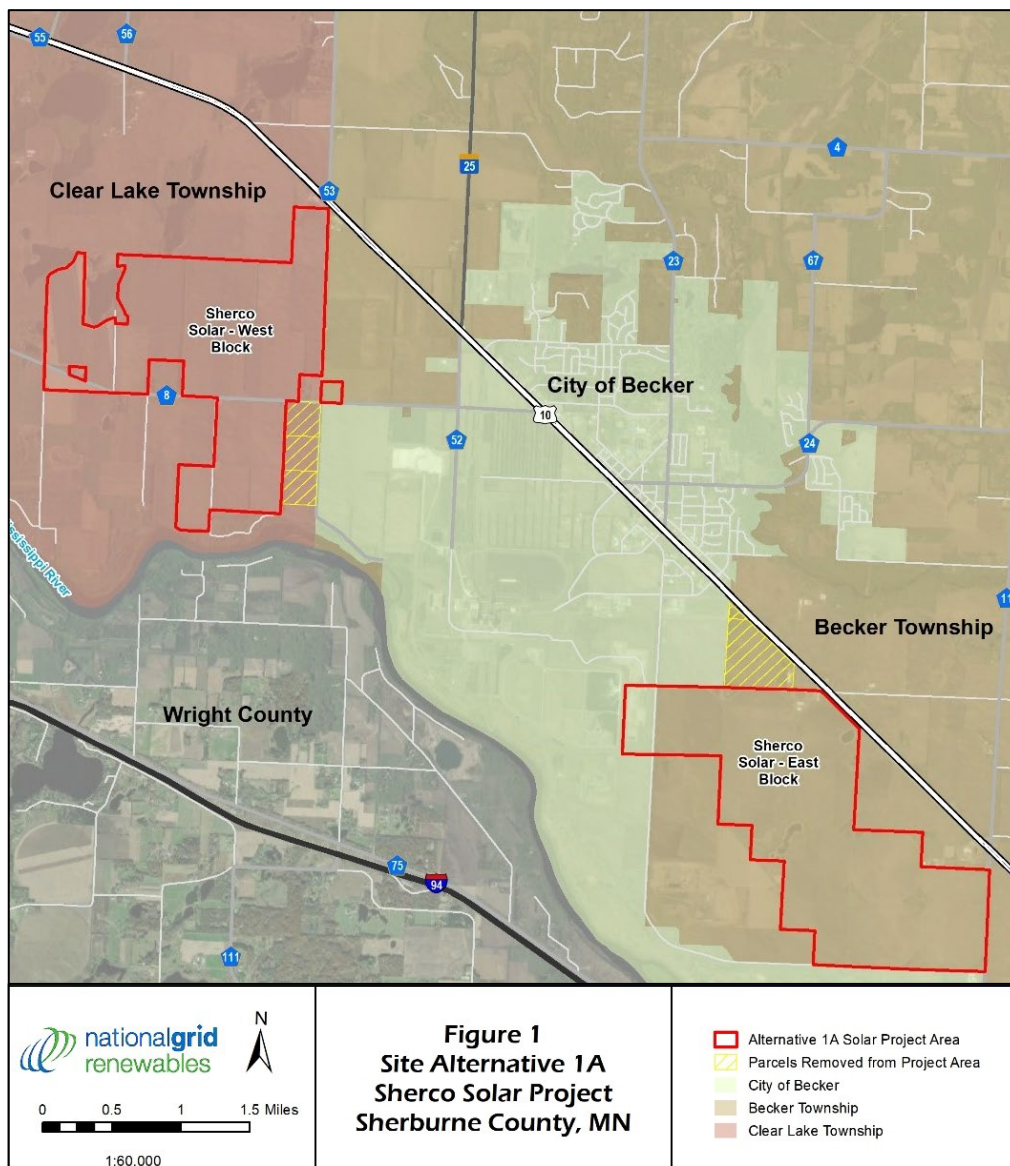
April 13, 2022

Bill Storm
Environmental Review Manager
Energy Environmental Review and Analysis
85 7th Place East, Suite 500,
Saint Paul, MN 55101

RE: REQUEST FOR ADDITIONAL INFORMATION REGARDING SITE ALTERNATIVE 1A

Dear Mr. Storm,

At the request of Energy Environmental Review and Analysis (EERA) staff, Xcel Energy submits this additional information regarding possible design measures that could be utilized to accommodate an up to 460 megawatt (MW) alternating current (AC) solar energy project within the area proposed Site Alternative 1A (Alternative 1A) for the solar portion of the Sherco Solar Project. As described in the April 6, 2022 Direct



Testimony of Aaron Brixius, Xcel Energy requested the Minnesota Public Utilities Commission approve Alternative 1A, which removes 5 parcels (approximately 246.7 acres) from the Solar Project Area proposed in the site permit application, and is shown in Figure 1. Alternative 1A was proposed to address concerns raised by the City of Becker. The revised Solar Project Area for Alternative 1A would consist of 3,237.0 acres, which matches the Solar Project Area and acreage of the Alternative 1 configuration of the solar portion of the Sherco Solar Project considered in the Environmental Assessment prepared by EERA.

Xcel Energy continues to evaluate the feasibility of maintaining the full 460 MW AC capacity within the Alternative 1A Solar Project Area. Various methods may be utilized to site and construct as much of the 460 MW AC nameplate capacity of the Sherco Solar Project within the spatial confines of Alternative 1A while ensuring any decisions are in the best interest of Xcel Energy customers. The measures that could be taken to maximize solar energy production with the Site Alternative 1A Solar Project Area include, equipment selection, minor footprint expansions of the Project Footprint within the Solar Project Area, panel infilling and panel row spacing, which are generally discussed below.

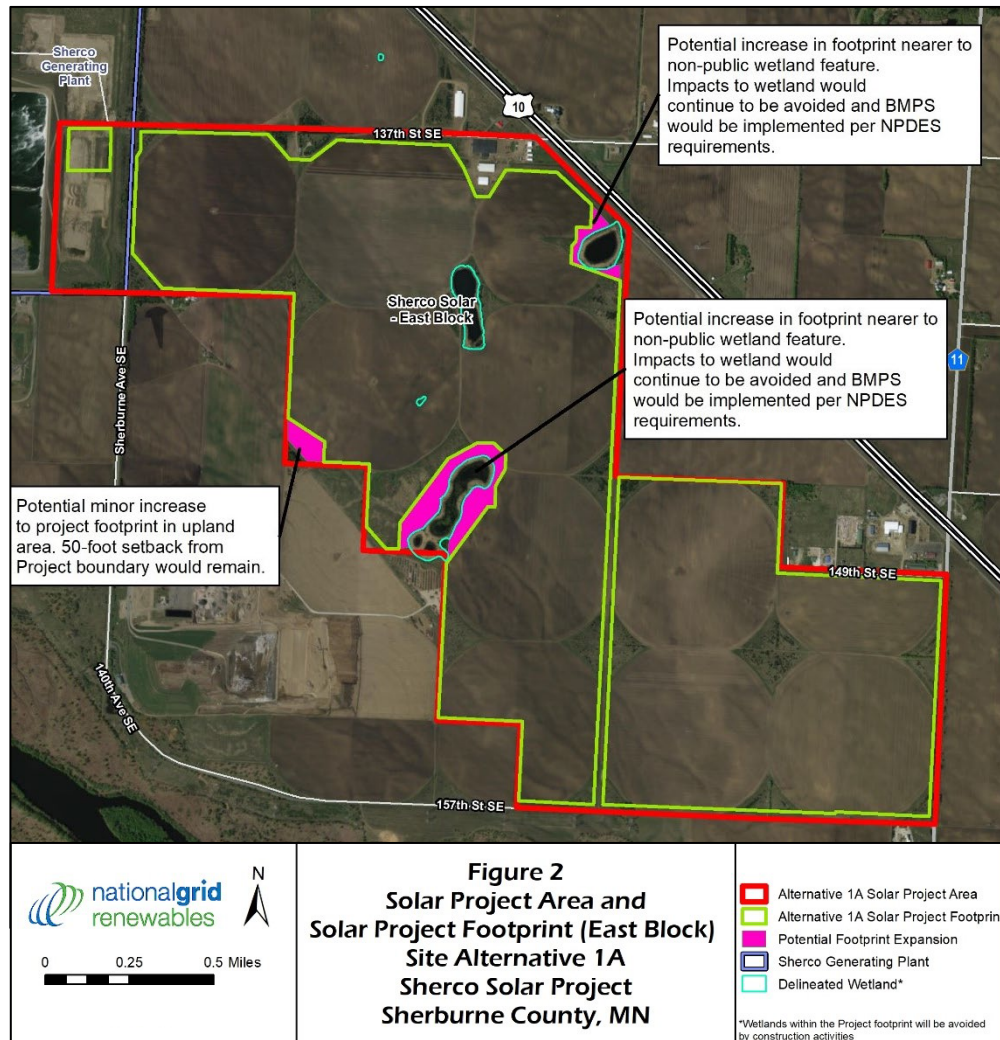
Equipment Selection and Procurement

Xcel Energy has released an RFP for equipment, panels, and inverters to select the final technology that will be utilized for the Project. One of the factors considered during the procurement process is the wattage output of various available panels. Panel wattage varies based on the model selected, and the final panel selected could impact which factors can successfully be implemented to maintain the 460 MW output within a smaller footprint. The panels in combination with the selected inverter can impact the total array area necessary to create a 460 MW Project. Final equipment specifications and engineering have the potential to impact the MW output per acre.

Footprint Expansion within the Solar Project Area

Select portions of the Project Footprint, defined in the Site Permit Application as lands converted to solar energy use, could be modified to allow for improved utilization of land resources while maintaining Xcel Energy's commitments in the Site Permit Application. Any footprint expansions would be contained within the Solar Project Area for Alternative 1 as assessed in the Environmental Assessment. The most significant areas of potential changes to the Project Footprint are identified in Figure 2. The Project's West Block footprint has few areas where additional Project Footprint could be realized as that solar footprint was already nearly fully maximized. The potential Alternative 1A Project Footprint additions would result in total Site Alternative 1A Project Footprint of approximately 2,856.4 acres. Thus, Site Alternative 1A would result in a reduction of approximately 167.8 acres from the Project Footprint analyzed in the Site Permit Application.

Additional engineering steps would need to be completed to confirm these Project Footprint expansions are feasible prior to updating the engineering design, and changes would be reflected in the Final design provided to EERA staff prior to construction. These footprint modifications would follow the commitments made in the Site Permit Application. All areas where the Project Footprint could be increased are in upland areas. No cultural resources were identified in these areas, and delineated wetland/waterbody resources continue to be avoided. Setback commitments as considered in the Site Permit Application would remain, including road setbacks, 50-foot setbacks from external property boundaries, and the 150-foot structure setback from public waterbodies subject to Sherburne County's Shoreland Overlay District. None of the proposed footprint expansions are nearby to adjacent residences or other receptors.

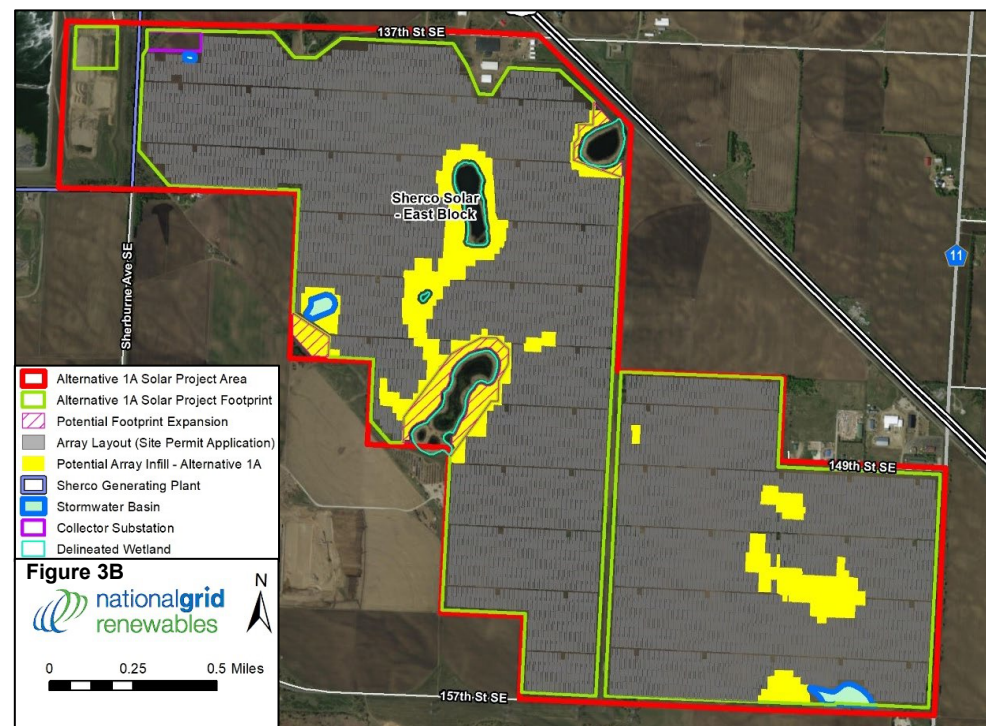
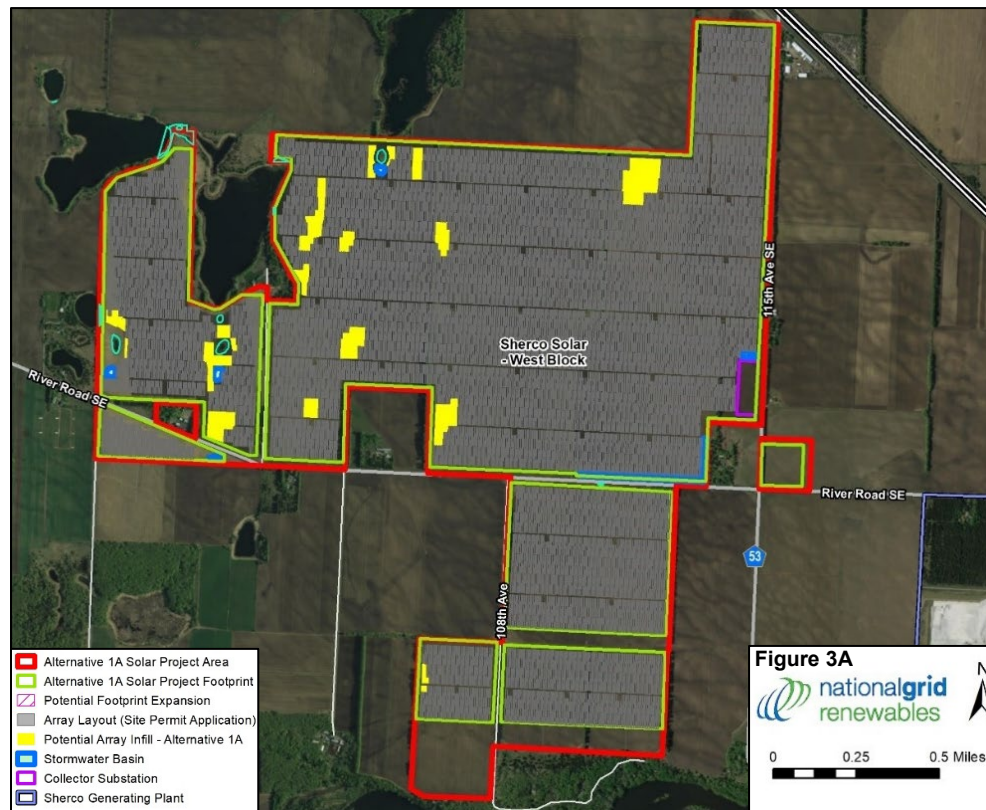


Solar Panel Infill

Select areas of the Project's preliminary design proposed in the Site Permit Application generally avoided placement of solar panels in low lying upland areas. These areas were avoided due to initial evaluations showing the potential for increased costs via additional site preparation, increased pile height, or additional grading to accommodate solar use. These areas contained no environmental features or sensitive areas that would prevent their use within the Project Footprint. Figures 3a and 3b identify areas that are potentially suitable for solar panel infill but require additional detailed engineering to make a final determination for their use.

Xcel Energy will continue to evaluate infill areas to determine feasibility of their use. Infill areas are sited within the solar Project Footprint that was assessed in the Site Permit application, other than the few footprint expansion areas in the Project's East block (See Footprint Expansion section above). Additionally, the Agricultural Impact Mitigation Plan (AIMP) considers topsoil segregation and other soil conservation measures for grading activities. The Project's Vegetation Management Plan (VMP) would require minimal updates, as it accounts for soils across the entire Site Control Area, and the VMP's seeding plan would be updated prior to submittal of final design to EERA, per the anticipated Site Permit Conditions. No cultural resources were identified in the infill areas, and delineated wetland/waterbody resources would continue to be avoided. Setback commitments as considered in the Site Permit Application would remain, including road

setbacks, 50-foot setbacks from external property boundaries, and the 150-foot structure setback from public waterbodies subject to Sherburne County's Shoreland Overlay District. None of the proposed infill areas are near adjacent residences. Lastly, any footprint modifications would be accounted for in stormwater calculations, per MPCA requirements for stormwater.



Row Spacing

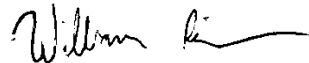
Adjustments to panel row spacing could be utilized to allow for 460 MW AC to be developed in a smaller Project Footprint. Decreasing panel row spacing, the distance from one row of solar panels to the next, would allow for an increased number of panels to be placed within a smaller footprint, increasing overall MW AC output within a smaller area. However, a reduction in panel row spacing can decrease production in the morning and evening, as the neighboring panel can cause increased shading to the next panel row when at full tilt. Late afternoon/evening hours are when power is generally in the highest demand and thus the production impact will need to be fully considered prior to making any adjustment to row spacing.

As the Project Footprint was already nearly maximized to the extent practicable, adjustments of row spacing would have little impact on the overall Project Footprint or area of disturbance. The outermost panel row would effectively remain in a similar position, with additional rows being implemented internally. The Project would appear materially similar from an external vantage point. Some minor adjustments to stormwater calculations may be necessary to accommodate the additional panel area within a similar footprint but should not significantly alter stormwater control measures for the Project. Adjustments of row spacing would not impact cultural resources or wetland resources. Setback commitments as considered in the Site Permit Application would remain, including road setbacks, 50-foot setbacks from external property boundaries, and the 150-foot structure setback from public waterbodies subject to Sherburne County's Shoreland Overlay District.

Conclusions

All of the possible engineering approaches that could be utilized to ensure the output of the Project of up to 460 MW AC would be within the commitments of the Site Permit Application. Impacts to cultural resources and wetland features are not anticipated. Setback commitments as considered in the site permit application would remain, including road setbacks, 50-foot setbacks from external property boundaries, and the 150-foot structure setback from public waterbodies subject to the Sherburne County Shoreland Overlay District. Additionally, the ability of EERA staff to review the final engineering design prior to construction, per the draft site permit conditions, allows for confirmation that the Project adheres to all site permit requirements.

Sincerely,



William Risse
Senior Permitting Specialist
National Grid Renewables (Authorized Representative for of Xcel Energy)

Certificate of Service

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OAH Docket Number: 21-2500-37959

Breann L. Jurek certifies that on the 14th day of April, 2022, she e-filed on behalf of Northern States Power Company, doing business as Xcel Energy true and correct copies of the following documents:

1. Letter in Response to EERA Questions regarding Alternative 1A; and
2. Certificate of Service.

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

Executed on: April 14, 2022

Signed: /s/ Breann L. Jurek

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

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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 CC Service List
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