

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

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Chair  
Commissioner  
Commissioner  
Commissioner  
Commissioner

In the Matter of Xcel Energy's Petition for  
Approval of the Sherco Solar Project

ISSUE DATE: July 6, 2021

DOCKET NO. E-002/M-20-891

ORDER GRANTING CERTIFICATE OF  
NEED EXEMPTION

**PROCEDURAL HISTORY**

On April 12, 2021, Northern States Power Company d/b/a Xcel Energy (Xcel or the Company) filed a petition for approval to develop, own, and operate 460 megawatts (MW) of solar capacity at the Sherco site in Sherburne County (the Sherco Solar project). Xcel requested that the Commission exempt the Sherco Solar project from the Certificate of Need (CN) requirements of Minn. Stat. § 216B.243.

On April 16, 2021, the Commission issued a Notice of Comment Period, seeking public comment on the requested CN exemption and the completeness of the petition.

On April 30, 2021, the Commission received comments from the following commenters:

- Department of Commerce, Energy Environmental Review and Analysis unit (DOC-EERA)
- Department of Commerce, Division of Energy Resources (DOC-DER)
- Laborers' International Union of North America, Minnesota and North Dakota (LIUNA)
- Becker Township
- City of Becker
- Office of the Attorney General—Residential Utilities Division (OAG)
- Institute for Local Self-Reliance (ILSR)

Between May 13 and June 8, 2021, the Commission received comments filed outside the comment period from R.D. Offutt Farms, Big Lake Sno Cruisers, Clear Lake Township Board, and several landowners in the area of the Sherco Solar project.

On May 19, 2021, Xcel filed an informational letter regarding its communications with the City of Becker.

On June 3, 2021, the Commission met to consider the matter.

## **FINDINGS AND CONCLUSIONS**

### **I. Project summary**

Xcel petitions to develop, own, and operate the Sherco Solar project, a 460 MW solar facility. Xcel anticipates that portions of the Sherco Solar project would begin commercial operations in 2023, with the entire project in service by the end of 2024. Xcel currently operates several coal units on the same site, which will be retired between 2023 and 2030. Xcel plans to reuse some of the transmission interconnection rights from the coal units for the solar facility; the Company noted that this was an important aspect of the project because transmission interconnection rights are limited in availability and difficult to obtain.

Sherco Solar is a joint development by Xcel and National Grid Renewables (NG Renewables). Xcel plans to acquire a 230 MW site from NG Renewables (the West Block) and combine it with another 230 MW site owned by Xcel (the East Block). The West Block will be on land leased by NG Renewables, and the East Block on land leased by Xcel. The Sherco Solar project is located partially in the City of Becker and Becker Township in Sherburne County.

In addition to the present docket, there are three other dockets related to the Sherco Solar project currently pending before the Commission. These are the site permit for the solar facility (Docket No. E-002/GS-21-191) and route permits for two high voltage transmission lines (the West transmission line, Docket No. E-002/TL-21-189; and the East transmission line, Docket No. E-002/TL-21-190).

For procedural purposes, this order will only address the issues of the requested CN exemption and completeness of the petition. The Commission will address the merits of the petition at a later meeting, after soliciting additional public comments.

### **II. Exemptions from Certificate of Need requirements**

Xcel argued that the Sherco Solar project was exempt from CN requirements for two reasons.

First, Xcel stated that the project was exempt from CN requirements pursuant to Minn. Stat. § 216B.2422, subd. 5, which states that “if an electric power generating plant . . . is selected in a bidding process approved or established by the commission, a certificate of need proceeding under section 216B.243 is not required.”

To solicit the Sherco Solar project, Xcel used the Modified Track 2 resource acquisition process, which was developed as part of Xcel’s last Integrated Resource Plan (IRP) and approved by the Commission in 2017.<sup>1</sup>

Alternatively, Xcel argued for a CN exemption pursuant to Minn. Stat. § 216B.243, subd. 9, which states that a CN is not required for “a solar electric generation facility that is intended to be used to meet [Renewable Energy Standards (RES)]; provided that, after notice and comment,

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<sup>1</sup> *In the Matter of Xcel Energy’s 2016–2030 Integrated Resource Plan*, Docket No. E-002/RP-15-21, Order Approving Plan with Modifications and Establishing Requirements for Future Resource Plan Filings (January 11, 2017).

the commission determines that the facility is a reasonable and prudent approach to meeting a utility's obligations under that section."

Xcel stated that the Sherco Solar project was needed to contribute to the statewide target of serving 10% of retail electric sales with solar energy by 2030,<sup>2</sup> in addition to other renewable energy goals in Minn. Stat. § 216B.1691.

### **III. Comments**

#### **A. City of Becker and Becker Township**

The City of Becker and Becker Township both filed comments noting that the Sherco Solar project would have significant impacts on land use and development within their boundaries, among other issues. Both municipalities requested that the Commission ensure that their concerns be addressed before further development of the project.

##### **1. Xcel response**

Xcel filed an informational letter with additional detail on its communications with the City of Becker and stated that the Company would continue to work towards a mutually beneficial resolution with both political subdivisions.

#### **B. DOC-DER**

DOC-DER recommended that the Commission find that the Sherco Solar project is exempt from CN requirements because Xcel used the Commission-approved Modified Track 2 bidding process. DOC-DER also recommended that the Commission use the informal comment and reply process rather than ordering a contested case, noting that there were no anticipated disputes of material fact.

DOC-DER proposed that Xcel provide an updated capacity expansion modeling (CEM) analysis, which could be established by an determination in Xcel's ongoing IRP,<sup>3</sup> a statutory mandate, or a new analysis (either particular to this docket or a reference to the analysis in the ongoing IRP). However, DOC-DER recommended that Xcel supplement its CEM to be consistent with the proposed cost recovery, reflecting only the load and resources serving the Minnesota and Wisconsin system.

##### **1. Xcel response**

At the Commission meeting, Xcel opposed DOC-DER's CEM recommendation and stated that it would be very challenging to split up the modeling in the way DOC-DER proposed. Xcel suggested that, instead, it could do the updated CEM analysis and separately provide information on the cost impact of pricing in other states.

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<sup>2</sup> Minn. Stat. § 216B.1691, subd. 2f, para. (e). "It is an energy goal of the state of Minnesota that, by 2030, ten percent of the retail electric sales in Minnesota be generated by solar energy."

<sup>3</sup> *In the Matter of Xcel Energy's 2020-2034 Upper Midwest Integrated Resource Plan*, Docket No. E-002/19-368.

### **C. DOC-EERA**

DOC-EERA did not take a position on whether a CN should be required. However, DOC-EERA recommended that the Commission make a decision on whether a CN is required before making any decision on the Sherco Solar project site and route permits (Docket Nos. E-002/GS-21-191, E-002/TL-21-190, and E-002/TL-21-189). DOC-EERA stated that this would provide clarity about the environmental review procedures to be used and would simplify the regulatory review process.

### **D. ILSR**

ILSR did not make a recommendation on the CN exemption or completeness of the petition but flagged several issues for the Commission to consider in subsequent proceedings. ILSR argued that, based on the available information, the project costs seemed high, and any comparison of the Sherco Solar project to community solar pricing was unreasonable. ILSR generally supported replacing the rate base of the Sherco coal plant with a large solar plant but supported a competitive process that considers all resources.

### **E. LIUNA**

LIUNA recommended that the Commission approve Xcel's CN exemption request, stating that the project was consistent with Xcel's IRP approved in 2017, it was selected through a Commission-approved bidding process, and it would help the Company meet its RES requirements.

LIUNA stated that Xcel had provided adequate information in its proposal and there were no material disputes of fact. LIUNA recommended that an informal comment and reply process be used to expeditiously develop a full record for consideration of the project's merits.

### **F. OAG**

The OAG argued the Sherco Solar Project requires a CN and does not qualify for any exceptions to that requirement, first arguing that the Sherco Solar project was not needed to meet Xcel's Renewable Energy Standard (RES) obligations under Minn. Stat. § 216B.1691. The OAG stated that, although Xcel argued that the Sherco Solar project would help meet its obligations sometime after 2020, it was unclear when this new solar generation might actually be required. Furthermore, based on Xcel's existing excess solar capacity and the ability to "bank" renewable energy credits generated before 2020, the OAG contended that it was unlikely Xcel would need new generation to satisfy the RES requirements until sometime in the 2030s—many years after the proposed in-service date for the Sherco Solar project.

Second, the OAG argued that the Commission's approval of the Modified Track 2 bidding process had expired, and therefore the process could no longer be the basis for a CN exemption. The OAG noted that the Commission's order on Xcel's 2015 IRP had approved the Modified Track 2 process for the acquisition of additional solar through 2021, and the Sherco Solar project would not begin service until at least the end of 2023.

Additionally, the OAG argued that Xcel's bidding process had been flawed, and if the Commission does not require a CN for the Sherco Solar project, the Commission should require Xcel to undergo a new bidding process to ensure robust competition. The OAG pointed out that

only two proposals had been received, compared to 83 proposals received during a 2016 solar bidding process by Minnesota Power. The OAG argued that this was because Xcel had artificially constrained competition by limiting eligible proposals to build-transfer projects located at the Sherco site, excluding any power purchase agreement proposals or build-transfer proposals at other sites.

### **1. Department and Xcel response**

In response, DOC-DER suggested at the Commission meeting that the 2021 date in the previous IRP order meant that the bidding process would need to be completed by the end of 2021 and was not the date that the project would need to come online.

Xcel argued that it had not artificially constrained the bidding process; rather, it had placed reasonable restrictions on bids that it wanted to solicit. Xcel stated that the project could not be built at a different site because the Company intended to reuse the existing interconnection rights at the Sherco site. Furthermore, Xcel expressed its commitment to the City of Becker, Becker Township, and the surrounding communities, noting that the Sherco coal plant had operated in that area for many years. Xcel stated that, as the coal plant is soon to be retired, it wanted to work closely with the community to build another project at the same site to help replace jobs and tax funding that the coal plant had provided.

### **G. Additional public comments**

The Commission received additional public comments in support of the Sherco Solar project from R.D. Offutt Farms, Big Lake Sno Cruisers, Clear Lake Township Board, and several nearby landowners.

## **IV. Commission action**

The Commission will grant an exemption to the CN requirement for the Sherco Solar project based on Xcel's use of the Modified Track 2 bidding process. Pursuant to Minn. Stat. § 216B.2422, subdivision 5 (b), a CN is not required for an electric power generating plant "selected in a bidding process approved or established by the [C]ommission."

The Modified Track 2 bidding process was approved by the Commission in its order on Xcel's 2015 IRP.<sup>4</sup> This approval was for the purpose of acquiring wind and solar resources as part of Xcel's five-year action plan (2016–2021). At the time the order was issued, the Commission anticipated that Xcel would be filing its next IRP in February 2019 and the use of the Modified Track 2 process would come before the Commission again before the end of the five-year period.<sup>5</sup>

However, the IRP process has been extended to allow for additional engagement with stakeholders and the public, and the Commission has not yet been able to issue a new IRP order. This puts the Commission in the unique and unanticipated position of having approved a bidding

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<sup>4</sup> *In the Matter of Xcel Energy's 2016–2030 Integrated Resource Plan*, Docket No. E-002/RP-15-21, Order Approving Plan with Modifications and Establishing Requirements for Future Resource Plan Filings (January 11, 2017).

<sup>5</sup> *Id.* at 12, ordering paragraph 13.

process for a limited time, but having been unable to reapprove the process (or approve a different bidding process) before the expiration of the initial time period.

Given the circumstances, the Commission finds that the Modified Track 2 bidding process approved in the last IRP applies to the Sherco Solar project. In Xcel's pending IRP, the Commission will have the opportunity to closely examine the Modified Track 2 process and determine whether it should be changed for future projects. Faced with this unusual and temporary situation, the Commission will grant the CN exemption for the Sherco Solar project based on Xcel's use of the previously approved Modified Track 2 bidding process.

The Commission will direct parties and staff to use the initial and reply comment process to develop the record in this proceeding. The comment process will be sufficient to expeditiously build the record without placing an unnecessary burden on the parties or the Company.

As part of the comment process, Xcel is directed to provide new capacity expansion modeling and an additional analysis of cost allocation between jurisdictions. This will give the Commission both a broad look at system-wide capacity and a detailed look at how costs are allocated to Minnesota ratepayers.

## ORDER

1. The proposed Sherco Solar project is exempt from a certificate of need pursuant to Minn. Stat. § 216B.2422, subdivision 5 (b).
2. The record in this proceeding shall be developed using the initial and reply comment process.
3. Xcel shall provide new EnCompass modeling that evaluates Sherco Solar as a system resource and includes an analysis that reflects the cost allocation between Xcel's various jurisdictions. Xcel shall file its supplemental modeling by July 9, 2021. The Commission grants authority to the Executive secretary to modify this deadline.
4. This order shall become effective immediately.

BY ORDER OF THE COMMISSION



Will Seuffert  
Executive Secretary



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## **CERTIFICATE OF SERVICE**

I, Chrishna Beard, hereby certify that I have this day, served a true and correct copy of the following document to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States mail at St. Paul, Minnesota.

**Minnesota Public Utilities Commission**

**ORDER GRANTING CERTIFICATE OF NEED EXEMPTION FOR SHERCO  
SOLAR PROJECT**

Docket Number **E-002/M-20-891**

Dated this 6th day of July, 2021

/s/ Chrishna Beard

[illegible]



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