



414 Nicollet Mall
Minneapolis, MN 55401

May 19, 2021

—Via Electronic Filing—

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: INFORMATIONAL LETTER
SHERCO SOLAR PROJECT
DOCKET NO. E002/M-20-891

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this informational letter to provide additional context to the letter submitted in this docket on April 30, 2021 by the City of Becker.

On April 21, 2021, the City of Becker sent a similar letter directly to the Company with many of the same messages. In the spirit of our collaborative relationship with the City and community, we have had additional conversations in the meantime to further discuss these issues and continue working toward a mutually beneficial resolution. In addition, we also sent a letter directly back to the City. For transparency, we have provided the April 21, 2021 letter from the City of Becker (and the map referenced therein) and our May 14, 2021 response to the City of Becker.

We have electronically filed this document with the Commission, and copies have been served on the parties on the attached service lists. Please contact me at bria.e.shea@xcelenergy.com or (612) 330-6064 if you have any questions regarding this filing.

Sincerely,

/s/

BRIA E. SHEA
DIRECTOR, REGULATORY & STRATEGIC ANALYSIS

Enclosures
c: Service List



**It's Better
in Becker**

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www.ci.becker.mn.us Becker, MN 55308



Administration

April 21, 2021



Community
Center

John Marshall
Xcel Energy, Inc.
414 Nicollet Mall
Minneapolis, MN 55401



Community
Development

Re: Sherco Solar proposal, Public Utilities Commission Docket No. E002/M-20-891

Dear Mr. Marshall,



Finance

Thank you for meeting with me and Community Development Director Pflipsen last week to discuss the City of Becker's ("City") concerns regarding Xcel Energy's ("Xcel") Sherco Solar proposal, which is currently before the Public Utilities Commission ("PUC"), Docket No. E002/M-20-891 (the "solar project"). The City values its longstanding relationship with Xcel and broadly supports Xcel's efforts to diversify its energy generation in the area to more efficient and equally sufficient sources while taking advantage of its existing interconnection facilities, including Xcel's proposed combined cycle natural gas plant and solar project. In turn, the City appreciates Xcel's support of the City's efforts to recover the site of the former Sherco coal-fired plant ("Sherco plant") site and facilitate its redevelopment by private industry.



Parks and
Recreation



Pebble Creek
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In the spirit of our longstanding cooperation, I am writing to you today to elaborate on the City's concerns with the solar project as currently proposed by Xcel and outline specific revisions the City requests Xcel make to the project's location, and to identify related issues of mutual concern on which the City wishes to collaborate with Xcel going forward.



Police
Department



Public Works

As Xcel is aware, the City stands to lose as much as 75 percent of its property tax base with the decommissioning of the Sherco coal-fired units and has been pursuing a strategy of replacing this loss in tax revenue with tax revenue generated by private redevelopment. Toward that end, the City, with significant financial support from the state, has made significant preparations and investments in serving portions of the Sherco site and nearby areas with municipal utilities and infrastructure to ready the area for private development. As a specific example of such investments, the City is installing new water and sewer mains and related infrastructure in the County Road 52 and County Road 53 rights-of-way on the west side of the Sherco site at an expense of more than \$22 million to serve the City's planned Business Park and anticipated future development in the area. Similarly, the City has planned for and invested approximately \$8 million in developing the capability to serve commercial and industrial development along Energy Drive on the eastern side of the Sherco site.



Administration

The City has a responsibility to its residents and businesses to maximize the benefits of these public investments over time. The City, though broadly supportive of Xcel's efforts to replace Sherco's energy generation, including with solar, has concerns that the solar project as currently proposed will undermine the City's efforts to attract private development to areas that could and should be served by this infrastructure.



Community
Center

The proposed locations for Xcel's solar project encompass lands directly west and southeast of the City's municipal boundary and include property abutting the City's infrastructure that would easily and logically be expected to develop and connect thereto. If these areas are instead included in Xcel's solar project, the project will block any potential industrial growth and development in those areas and waste much of the potential benefits that could be expected from these significant infrastructure investments to the detriment of the City's residents and businesses (and Xcel's ratepayers). For these reasons, the City respectfully requests that Xcel engage in conversations with the City of Becker to strategically locate any proposed solar projects in areas that minimize negative impacts to these growth areas. The industrial growth areas which are impacted by the proposed solar project are depicted as the City's Business Park Reserve Overlay area shown in purple on the map enclosed herewith. The Business Park Reserve Overlay area represents the industrial area that the City has focused on serving in its Comprehensive Plan and Utility Infrastructure expansion planning efforts to date, and parcels of property located within this Business Park Reserve Overlay area that Xcel proposes to include in its solar project represent a small percentage of the project's approximately 3,480 total acres.



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Public Works

If Xcel would agree to alter the proposed solar project footprint to accommodate the City's economic development, planning, and infrastructure efforts described above, the City would offer its support for the project, including as requested in proceedings at the PUC. The City understands that Xcel has petitioned the PUC for approval of the solar project and proceedings at the PUC are underway. On behalf of the City, I appreciate your consideration of the City's request, and prefer to work directly with you and your team to revise the location of the project. However, if Xcel is unwilling to work with the City to modify its proposal to allow for future growth and development in a way that addresses both parties' priorities, the City will explore its options to protect the public investments made on behalf of the City and its residents, up to and including filing for intervention in opposition to the project.

Beyond the City's specific concerns with and requested revisions to Xcel's solar project mentioned above, the City strongly believes that there are numerous opportunities that will be mutually beneficial for both the City and Xcel in promoting the recovery and redevelopment of the Sherco site. The City hopes to strengthen and build on its existing relationship with Xcel to maximize these opportunities for redevelopment and power generation. The City has identified the following specific issues that it would like to pursue with Xcel and ultimately formalize in an agreement once we have resolved the location of the solar project; the City is of course open to any suggestions Xcel may want to discuss as well.

First, the City would like to reach an agreement with Xcel regarding the continued use of the "buffer properties" owned by Xcel surrounding the Sherco facility for business redevelopment, particularly large-scale, energy intensive uses that are uniquely suited to take advantage of the existing facilities and assets of the Sherco site. As a part of this process, the City proposes that an account to house the proceeds from the sales of the Sherco buffer properties be created with account proceeds used to facilitate redevelopment in the City, including but not limited to



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reinvestment in infrastructure, improvements to accommodate business projects, and gap financing for individual projects. As Xcel is undoubtedly aware, the company bought the property from City residents back in the 1970s. Over time, the value of the property has appreciated considerably. Making this land available to energy-intensive users will allow for business development benefitting the City and would also allow for Xcel to sell excess generating capacity to those same users. The electric rates paid by such users will benefit both parties – new businesses will purchase electricity, benefitting Xcel, and will bring more people to the City, driving rates down for existing residents and businesses. As a part of this collaborative effort, the City would additionally like to formalize an agreement with Xcel for electric service discounts to businesses in the City to aid the City's efforts to attract new businesses.

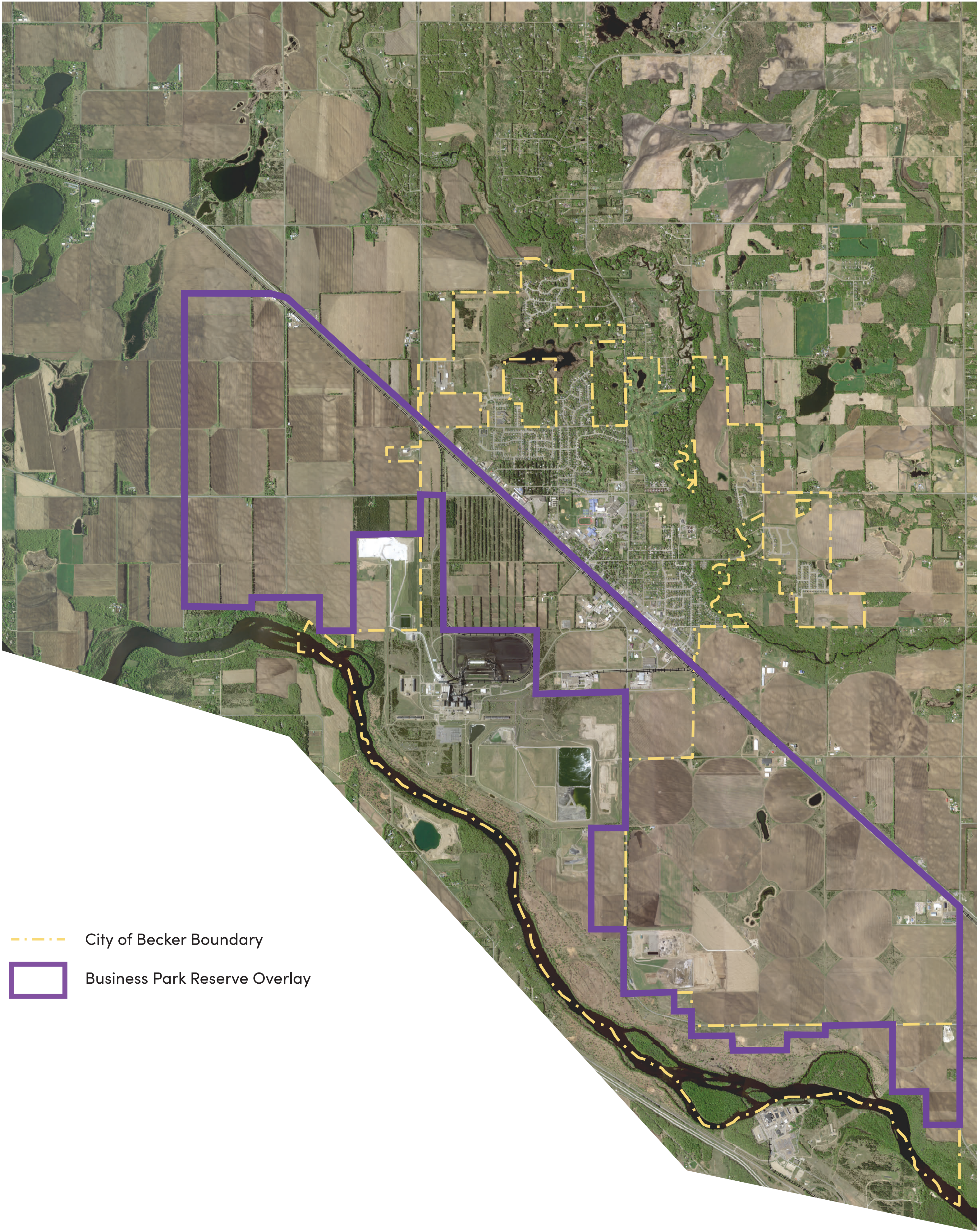
Second, the City would like to strategically plan for and formalize the reuse of the Sherco site's assets to serve business development. Infrastructure serving the Sherco site, such as the water intake, water discharge, and the railroad spur, would be valuable to Xcel Energy and the community for developing large energy customers, creating jobs, and bolstering the tax base. Xcel Energy and the City have discussed the construction of a water treatment plant to be constructed on the banks of the Mississippi River to attract large-scale business investment. The City would like to move forward on this initiative as well.

We look forward to continuing our work with Xcel to find a solution to Xcel's proposed solar project and the related issues addressed herein that will benefit both Xcel and the City for years to come. Please do not hesitate to contact me at gpruszinske@ci.becker.mn.us if you have any questions about this letter. I look forward to your response.

Thank you.

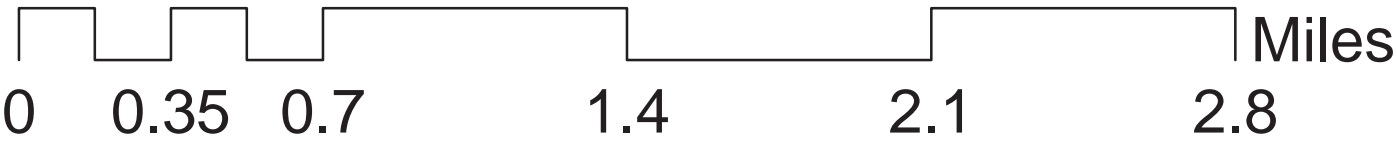
Sincerely,

Greg Pruszinske
City Administrator



- City of Becker Boundary
- Business Park Reserve Overlay

Business Park Reserve Overlay



Greg Pruszinske – City Administrator
City of Becker
12060 Sherburne Ave.
Becker, MN 55308

May 14, 2021

RE: 4/21/2021 Letter “Sherco Solar proposal, PUC Docket No. E002/M-20-891

Dear Mr. Pruszinske,

Thank you for your April 21, 2021 letter related to our Sherco Solar Project. Xcel Energy is proud of our longstanding collaborative relationship with the City of Becker. We value the communities we serve and are committed to working with communities as we transition away from coal.

I am responding to acknowledge your concerns and clarify some of the specific items from your letter, and to hopefully begin a discussion around the development of a master plan for the redevelopment of the Sherco site and other land in the Becker area that could support business development.

For more than a decade, we’ve pursued a successful strategy to transition to clean energy. We are the first company to announce our vision to provide carbon-free energy by 2050. Along the way, we will reduce our carbon emissions 80% by 2030, and 60% of that energy will be from renewable sources. As you are aware, a critical part of that transition is the decommissioning of our coal units at Sherco. While we believe this transition is in the best interest of our customers, the state, and the local community, we recognize impacts of this change will be felt acutely by the City, particularly through the loss of property tax base currently filled by the plant. We appreciate the challenges this change brings and are committed to continuing to work with the City and other regional partners to attract new business and develop new infrastructure that can replace this property tax base.

We have shown this commitment and our ability to work collaboratively with the City through our support attracting businesses to Becker, including Liberty Paper, Northern Metals, and the planned Google data center. We intend to continue working collaboratively with the City to bring more economic development to the area. One such development is our proposed Project.

The Project is a key part of our clean-energy transition and will provide 460 megawatts of renewable energy, producing enough carbon-free energy to power 100,000 homes annually. The Project also replaces approximately half of the tax revenue lost from ceasing operations of Sherco Unit 2. We recognize the Project footprint is outside the City’s municipal boundary but note that Sherco buffer property within the City municipal boundary is currently being reserved for economic development.

We were mindful of the City's economic development plans and bonding request when we planned the Project. We met with the City on multiple occasions and designed the Project to align with Becker's Comprehensive Plan as well as the March 1, 2021 map provided to us. The Company has been working with the City, Sherburne County, and Clear Lake Township on the reconstruction of County Road 53 including installation of new municipal infrastructure. The design of this infrastructure and the City's ultimate expansion feasibility study for Business Park Expansion (SEH BECKR 149190) equates to your bonding request as shown in the attached map. Only a small section on the western block of the Project abuts the future potential City infrastructure.

Notwithstanding our strong support for the City's ambitions regarding economic development in the Becker area, we note that some of the proposals in your April 21, 2021 letter are concerning. It appears that the Business Park Reserve Overlay overlaps with more than 70% of the Project's total acreage. Similarly, we note that your request for the reservation of proceeds from the sale of the Sherco buffer properties for economic development is challenging. As you are aware, Minn. Stat. Section 216B.50 requires that any sale of utility operating plant valued at over \$100,000 requires Commission approval, and, as a matter of general practice, we usually return proceeds from such sales directly to our customers.

That said, we interpret your letter as a general appeal that the Company continue our collaboration with the City to support economic development in the area, and we whole-heartedly support that direction. To optimize Sherco property and its correlating assets we propose developing a master plan for future development as units cease operation. This approach would commence with an assessment of the site to determine potential uses of existing plant infrastructure and identify additional needs. The goal is to complete a thorough analysis of both natural and constructed attributes to achieve a mutual development vision. We are confident this collaborative approach provides a solid framework for future development and reuse of existing assets. Also, this demonstrates our commitment to Becker for a balanced stakeholder group to guide the process by considering the many factors and unique conditions of a coal plant site, along with the community's redevelopment goals. Together, we can further strengthen our rich history of collaboration and problem solving while serving as a model for other host communities.

While engaging in master planning activities will not eliminate all potential challenges, thinking through these impacts, and actively engaging in a planning process can ultimately lead to a transition that results in the best outcome for the City and regional partners. We welcome immediate dialogue to further outline master plan details.

We will communicate separately with representatives from Sherburne County and Becker and Clear Lake Townships to continue this conversation and hopefully begin development of a plan for economic development in the region in the coming decades.

Sincerely,

A handwritten signature in cursive script that reads "John Marshall".

John Marshall
Director of Community Relations

CERTIFICATE OF SERVICE

I, Crystal Syvertsen, hereby certify that I have this day served copies or summaries of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped
with postage paid in the United States Mail at Minneapolis, Minnesota

xx electronic filing

Docket No. E002/M-20-891

Dated this 19th day of May 2021

/s/

Crystal Syvertsen
Regulatory Administrator

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| Kevin | Pranis | kpranis@liunagroc.com | Laborers' District Council of MN and ND | 81 E Little Canada Road St. Paul, Minnesota 55117 | Electronic Service | No | OFF_SL_20-891_Official |
| Greg | Pruszinske | gpruszinske@ci.becker.mn.us | City of Becker | PO Box 250 12060 Sherburne Ave Becker, MN 55308 | Electronic Service | No | OFF_SL_20-891_Official |
| 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_20-891_Official |
| Kevin | Reuther | kreuther@mncenter.org | MN Center for Environmental Advocacy | 26 E Exchange St, Ste 206 St. Paul, MN 551011667 | Electronic Service | No | OFF_SL_20-891_Official |
| | | | | | | | |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
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| Isabel | Ricker | ricker@fresh-energy.org | Fresh Energy | 408 Saint Peter Street Suite 220 Saint Paul, MN 55102 | Electronic Service | No | OFF_SL_20-891_Official |
| Susan | Romans | sromans@allete.com | Minnesota Power | 30 West Superior Street Legal Dept Duulth, MN 55802 | Electronic Service | No | OFF_SL_20-891_Official |
| Richard | Savelkoul | rsavelkoul@martinsquires.com | Martin & Squires, P.A. | 332 Minnesota Street Ste W2750 St. Paul, MN 55101 | Electronic Service | No | OFF_SL_20-891_Official |
| Larry L. | Schedin | Larry@LLSResources.com | LLS Resources, LLC | 332 Minnesota St, Ste W1390 St. Paul, MN 55101 | Electronic Service | No | OFF_SL_20-891_Official |
| Elizabeth | Schmiesing | eschmiesing@winthrop.com | Winthrop & Weinstine, P.A. | 225 South Sixth Street Suite 3500 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_20-891_Official |
| Kevin | Schwain | Kevin.D.Schwain@xcelenergy.com | Xcel Energy | 404 Nicollet Mall Minneapolis, MN 55401 | Electronic Service | No | OFF_SL_20-891_Official |
| 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_20-891_Official |
| Colleen | Sipiorski | Colleen.Sipiorski@wecenergygroup.com | Minnesota Energy Resources Corporation | 700 North Adams St Green Bay, WI 54307 | Electronic Service | No | OFF_SL_20-891_Official |
| Ken | Smith | ken.smith@districtenergy.com | District Energy St. Paul Inc. | 76 W Kellogg Blvd St. Paul, MN 55102 | Electronic Service | No | OFF_SL_20-891_Official |
| | | | | | | | |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
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| Peggy | Sorum | peggy.sorum@centerpointenergy.com | CenterPoint Energy | 505 Nicollet Mall Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_20-891_Official |
| Jamez | Staples | jstaples@renewablepartners.com | Renewable Energy Partners | 3033 Excelsior Blvd S Minneapolis, MN 55416 | Electronic Service | No | OFF_SL_20-891_Official |
| Byron E. | Starns | byron.starns@stinson.com | STINSON LLP | 50 S 6th St Ste 2600 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_20-891_Official |
| Richard | Stasik | richard.stasik@wecenergygroup.com | Minnesota Energy Resources Corporation (HOLDING) | 231 West Michigan St - P321 Milwaukee, WI 53203 | Electronic Service | No | OFF_SL_20-891_Official |
| Kristin | Stastny | kstastny@taftlaw.com | Taft Stettinius & Hollister LLP | 2200 IDS Center 80 South 8th St Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_20-891_Official |
| Cary | Stephenson | cStephenson@otpc.com | Otter Tail Power Company | 215 South Cascade Street Fergus Falls, MN 56537 | Electronic Service | No | OFF_SL_20-891_Official |
| James M | Strommen | jstrommen@kennedy-graven.com | Kennedy & Graven, Chartered | 150 S 5th St Ste 700 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_20-891_Official |
| Eric | Swanson | eswanson@winthrop.com | Winthrop & Weinstine | 225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629 | Electronic Service | No | OFF_SL_20-891_Official |
| Lynnette | Sweet | Regulatory.records@xcelenergy.com | Xcel Energy | 414 Nicollet Mall FL 7 Minneapolis, MN 554011993 | Electronic Service | Yes | OFF_SL_20-891_Official |
| Stuart | Tommerdahl | stommerdahl@otpc.com | Otter Tail Power Company | 215 S Cascade St PO Box 496 Fergus Falls, MN 56537 | Electronic Service | No | OFF_SL_20-891_Official |

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|------------|-----------|-------------------------------------|--|--|--------------------|-------------------|------------------------|
| Thomas | Tynes | jjazynka@energyfreedomcoalition.com | Energy Freedom Coalition of America | 101 Constitution Ave NW Ste 525 East Washington, DC 20001 | Electronic Service | No | OFF_SL_20-891_Official |
| Analeisha | Vang | avang@mnpower.com | Minnesota Power | 30 W Superior St Duluth, MN 558022093 | Electronic Service | No | OFF_SL_20-891_Official |
| Lisa | Veith | lisa.veith@ci.stpaul.mn.us | City of St. Paul | 400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102 | Electronic Service | No | OFF_SL_20-891_Official |
| Samantha | Williams | swilliams@nrdc.org | Natural Resources Defense Council | 20 N. Wacker Drive Ste 1600 Chicago, IL 60606 | Electronic Service | No | OFF_SL_20-891_Official |
| Joseph | Windler | jwindler@winthrop.com | Winthrop & Weinstine | 225 South Sixth Street, Suite 3500 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_20-891_Official |
| Patrick | Zomer | Pat.Zomer@lawmoss.com | Moss & Barnett a Professional Association | 150 S. 5th Street, #1200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_20-891_Official |