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Minneapolis, MN 55401

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July 27, 2022

—Via Electronic Filing—

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

RE: SUPPLEMENTAL FILING
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 (Commission) this Supplemental Filing regarding our proposed 460 MW Sherco Solar Project (Project).

After having requested a temporary delay of the approval of the Project in April given the market volatility and significant disruption in the solar supply chain, we are excited to bring this project back to the Commission and request approval. While there is still much uncertainty with solar prices and the supply chain, the Company has worked hard to find a creative, viable path forward to deliver the Sherco Solar Project on schedule and in a way that limits any cost increase to customers.

We have worked to gain support from all key stakeholders, including reaching agreements with both the City of Becker, to ensure the Project aligns with the City's goals, and the Minnesota Department of Commerce to establish important customer protections, which we outline in this filing. In addition, the Project is now supported by a wide range of other key stakeholders, including the Clean Energy Organizations, labor groups, local landowners, and the local communities of Clear Lake Township and Becker Township.

Sherco Solar is potentially the most important renewable energy development in Minnesota's history – it will be the largest single solar development in the Upper Midwest and among the largest in the United States. In addition to Sherco Solar being the least-cost resource to satisfy an identified need in our approved 2020-2034 Upper Midwest Integrated Resource Plan – and the least-cost solar resource on our system – the Project boasts numerous other benefits. First, as a Company-owned solar development, we can pass any applicable benefits from future tax reform on to our customers, which the

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Company demonstrated with our recently completed Dakota Range wind project. Second, by being located near the Sherco plant, the Project will support a just transition for workers at the plant, creating more than 900 union construction jobs (with an estimated \$115 million in wages) over the course of three years and generating an estimated \$240 million in local benefits over the life of the Project, which will be critical for the local economy as we retire our remaining coal units by 2030. Third, the Project will provide an optimal first training opportunity for 75 participants in our approved Workforce Development and Training pilot program. Fourth, the Project has been designed to minimally impact the state's prime agricultural land and will employ best practices to ensure the land is productive into the future and ecologically sustainable during the operation of the facility. Fifth, the Project will result in a dramatic reduction in carbon emissions, avoiding a further 250,000 to 300,000 tons of carbon emissions (in addition to other criteria pollutants) annually. Finally, the Project provides a unique research opportunity in partnership with the Great Plains Institute to study the ecosystem benefits offered by solar projects.

Considering the many Project benefits and considerations mentioned above and further detailed in this filing, we request that the Commission approve the Sherco Solar Project no later than September 15, 2022 to ensure that construction activities can begin on the Project yet this year, and we can remain on track to fully reuse the Sherco 2 interconnection rights.

We thank the Commission for its time with and consideration of this groundbreaking project for our customers, and for all of Minnesota.

Portions of this filing are marked "Not-Public" as they contain information the Company considers to be trade secret data as defined by Minn. Stat. §13.37(1)(b). This information includes confidential pricing, bid information, and contractual terms. This information has independent economic value from not being generally known to, and not being readily ascertainable by, other parties who could obtain economic value from its disclosure or use.

We have electronically filed this document with the Commission, and copies have been served on the parties on the attached service list. Please contact me at bria.e.shea@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

BRIA E. SHEA
REGIONAL VICE PRESIDENT, REGULATORY POLICY

Attachment
c: Service List

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STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Joseph K. Sullivan	Vice-Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF THE PETITION OF
XCEL ENERGY FOR APPROVAL OF THE
ACQUISITION OF SOLAR GENERATION
AT XCEL ENERGY’S SHERBURNE
COUNTY SITE

DOCKET No. E002/M-20-891

SUPPLEMENTAL FILING

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission (Commission) this Supplemental Filing on our proposed Sherco Solar Project (Project). As we discuss throughout this filing and elsewhere in the record, the Sherco Solar Project is in the public interest. Although the solar industry as a whole has encountered significant challenges this past year, we have been able to effectively work through them, and we now have sufficient certainty related to the Project to bring it back in front of the Commission. Moreover, we have worked to gain support from all key stakeholders, including reaching agreements with both the City of Becker, to ensure the Project aligns with the City’s goals, and the Minnesota Department of Commerce (Department) to establish customer protections. In addition, the Project is supported by a wide range of other key stakeholders, including the Clean Energy Organizations (Fresh Energy, Clean Grid Alliance, Minnesota Center for Environmental Advocacy and Sierra Club), key labor groups (including the International Brotherhood of Electrical Workers (IBEW), Local 292, International Union of Operating Engineers, Local 49 and LIUNA Minnesota & North Dakota), local landowners, and the local communities of Clear Lake Township and Becker Township. The Sherco Solar Project is in the public interest, and it should now be approved.

In our April 8, 2022 Reply Comments in this docket, we requested that the Commission temporarily suspend this proceeding to allow time for the Company to assess the impact of the U.S. Department of Commerce’s (DOC) antidumping and

countervailing duty investigation of solar cells from four Southeast Asian countries in response to a petition filed by a California-based solar panel assembler. Since that time, the Biden administration has announced a 24-month tariff exemption for solar panels from those countries to help stabilize the solar market. While there is still much uncertainty with solar prices and the supply chain, the Company has worked hard to find a creative, viable path forward to deliver the Sherco Solar Project on schedule and in a way that limits any cost increase to customers.

In our Initial Petition filed on April 12, 2021, we proposed that the 460 MW Project would cost **[PROTECTED DATA BEGINS PROTECTED DATA ENDS]** on a levelized cost of energy (LCOE) basis. Since that time, solar PPA prices in the U.S. have increased dramatically by more than 25%, including rising 8% in the second quarter of 2022 alone.¹ Although the Sherco Solar Project has been affected by the same economic forces driving these increases, we have been able to limit the cost of the Project to **[PROTECTED DATA BEGINS PROTECTED DATA ENDS]**. On an LCOE basis, the Project's updated price is **[PROTECTED DATA BEGINS PROTECTED DATA ENDS]**, which is a **[PROTECTED DATA BEGINS PROTECTED DATA ENDS]** that is well below the average increase of solar PPA prices during the same timeframe.

Additionally, we recognize that both the Department and Office of the Attorney General (OAG) raised concerns with the RFP process used to select the Sherco Solar Project and whether the Project's price was sufficiently competitive. While we remain confident in that RFP process, we are committed to ensuring that this updated project cost is competitive with other solar proposals in the marketplace by putting additional customer protections in place. As discussed below, we have reached an agreement with the Department on an approach that will both ensure the Project remains on schedule and is competitively priced compared to other proximate projects.

As discussed in our Informational Compliance Filing on July 20, 2022 (Docket Nos. E002/RP-19-368 and E002/M-22-403), we will soon issue a new RFP for additional solar projects to fulfill the 1,300 MW of solar needed by 2026 approved in our most recent 2020-2034 Upper Midwest Integrated Resource Plan. As detailed below, we have agreed with the Department to compare the revised project pricing to this forthcoming RFP and impose a price cap that ensures the Project would have been selected in the RFP. We have discussed this approach with a number of stakeholders, in addition to the Department, and believe it should alleviate any concerns regarding

¹ "U.S. solar prices soared over 8% in 2nd qtr. – report," Reuters, July 14, 2022 <https://www.reuters.com/business/energy/us-solar-prices-soared-over-8-2nd-qtr-report-2022-07-14/>.

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our past RFP and the cost of the Project. However, to be clear, we do not believe the Sherco Solar Project should be rebid as part of the upcoming RFP process or delayed to compare the Project to the upcoming RFP's projects. Despite previous delays related to the DOC's investigation, we are still able to deliver the Project within the planned timeframe; however, further delaying approval would jeopardize meeting our approved resource needs, maintaining valuable interconnection rights, and delivering the Project's many benefits to our customers and host communities.

Sherco Solar is potentially the most important renewable energy development in Minnesota's history. It will be the largest single solar development in the Upper Midwest and among the largest in the United States. It will serve as a direct replacement for most of the capacity of the first coal unit retiring at the Sherco plant. It also represents a major opportunity for a workforce and community that has borne the impacts of the clean energy transition that we – including the Company, our regulators, and many stakeholders involved in both our IRP and this proceeding – have advocated for. They are the workers and communities that have built their lives around supplying our customers with affordable electricity for decades. And, they now will be instrumental in the transition of our electric generation fleet through the support of Minnesota's largest solar development.

This Project will support the creation of approximately 900 well-paying union construction jobs. It is also uniquely positioned to support the recently approved Workforce Training and Development program, called Xcel Energy's Power Up program, which is designed to integrate historically marginalized communities into the energy workforce. And, notwithstanding the recent cost increases, when constructed, it still will be the lowest-cost solar resource in the Company's generation fleet. The Project was selected in a competitive bid process approved by the Commission, overseen by an Independent Auditor, is consistent with the Company's last two approved IRPs, and, with this filing, we have taken the unprecedented step of agreeing to compare it to a subsequent competitive bid process. It should be approved now so that we can bring these important benefits to our customers and communities.

Given the many Project benefits and considerations mentioned above and detailed in this Supplemental filing, we request that the Commission convene a meeting to approve the Sherco Solar Project as soon as possible to ensure that construction activities can begin on the Project yet this year, and we can remain on track to fully reuse the Sherco 2 interconnection rights.

SUPPLEMENTAL COMMENTS

The record in this matter is clear that the Sherco Solar Project should be approved. As discussed below, the Commission's decision in the IRP establishes that resources reusing the Sherco interconnection are needed. The competitive procurement process we used to acquire the Project, and our commitment to compare to the upcoming RFP, will result in a resource that is least cost to meet that identified need, and make the past concerns raised by parties related to the Company's procurement process a moot issue. Additionally, the Project will bring significant benefits to the community and our customers.

A. Sherco Solar is Consistent with the Recently Approved IRP and Needed to Meet the Company's Capacity Needs.

When the Company submitted its Petition requesting approval for the Sherco Solar Project on April 12, 2021, the Commission had yet to consider the Company's 2020-2034 IRP. Since that time, however, the Commission has approved the IRP with modifications. Among other things, the Commission approved the need for approximately 1,300 MW of solar by 2026, including:

Approximately 720 megawatts of company-owned solar-powered generators to fully reutilize the interconnection capacity to be made available following the retirement of the Sherco Unit 2—460 MW of which could come from the proposed Sherco Solar project if approved by the Commission.²

In approving the IRP, the Commission also authorized the Company to procure resources following the Modified Track 2 acquisition process, which is what the Company employed to select the Sherco Solar Project:

Regarding resource acquisition...Xcel shall use the No-Bid/Track 1 and Xcel-Bid Auditor/Modified Track 2 bidding processes for the solar, wind, and storage resources approved in Ordering Paragraph 2...³

² Minnesota Public Utilities Commission, Order, Integrated Resource Plan proceeding (Docket No. E002/RP-19-368), April 15, 2022.

³ Ibid, page 33.

The Order recognized that, when an RFP is being issued exclusively for a need the Commission has stated may be limited to Company-owned resources, as with the acquisition of 720 MW of resources to reuse the Sherco Unit 2 interconnection, the RFP may exclude PPAs from qualifying. These Order points constitute *prima facie* evidence of a need for a solar resource of the magnitude of Sherco Solar interconnecting at the Sherco substation and the appropriate bidding process for them.⁴ In fact, as shown in the IRP, the Company needs to procure significantly more solar resources than the proposed Sherco Solar Project to avoid a capacity deficit in the relatively near future. Further, it is a benefit to the broader MISO market to ensure Sherco 2 capacity is replaced upon its retirement, given the current state of the market.⁵

In meeting any capacity need, the Company has two general options: 1) reusing existing interconnection; or, 2) going through the MISO generator interconnection queue (GIQ) process. As approved by the Commission in our IRP, we will take advantage of both approaches in adding resources to our system over the next decade. This balanced approach to resource additions ensures we are both able to add all the resources we need as we transition away from coal generation and do so for the best price for our customers. In the current transmission-constrained environment, the most efficient way – and least-cost way for our customers by far – is to maximize reuse of our existing interconnection rights, including at Sherco. It is a rare opportunity to have such a significant amount of open, existing interconnection ready for new renewables.

This opportunity is critical because MISO’s Definitive Planning Phase (DPP) study process has been mired in significant delays as the number of proposed projects in MISO has expanded. Current studies are more than a year behind schedule due to the large volume of requests (including speculative requests) and delays with the neighboring Regional Transmission Organization – the Southwest Power Pool or “SPP” – completing affected system studies. The Company has experienced these delays firsthand with the approved 80 MW Elk Creek Project. We alluded to the delays with the Elk Creek Project in our Petition nearly one year ago; since that time,

⁴ See Minn. Stat. § 216B.2422, Subd. 2(b) (the findings and conclusions in an order approving, rejecting, or modifying a resource plan “shall constitute *prima facie* evidence which may be rebutted by substantial evidence in all other proceedings.”); Minn. R. 7843.0600, Subp. 2 (“The findings of fact and conclusions from the commission’s decision in a resource plan proceeding may be officially noticed or introduced into evidence in related commission proceedings, including, for example, rate reviews, conservation improvement program appeals, depreciation certifications, security issuances, property transfer requests, cogeneration and small power production filings, and certificate of need cases. In those proceedings, the commission’s resource plan decision constitutes *prima facie* evidence of the facts stated in the decision.”)

⁵ Utility Dive, “MISO faces growing capacity shortfalls in northern, central regions, annual survey finds,” <https://www.utilitydive.com/news/miso-midcontinent-capacity-shortfalls-OMS-survey/625351/>, June 13, 2022.

the Elk Creek Project has remained substantially delayed in the MISO queue, with the project developer declaring Force Majeure events due to DPP study delays, among other things.⁶

Based on the MISO GIQ constraints and costs associated with interconnecting greenfield projects, if we do not reuse the Sherco 2 interconnection rights for the Sherco Solar Project now (or any other projects in the immediate future), our customers will lose the significant value associated with these interconnection rights, and adding the resources identified in the IRP to meet our 2026 capacity needs may not be possible, much less at a reasonable cost. Given the immense value offered by our existing interconnection rights, and our approved capacity need, now is the time to develop solar projects – like Sherco Solar – that take advantage of these interconnection opportunities.

B. Sherco Solar is a Least-Cost Addition Reusing the Sherco Interconnection Rights to Meet the Capacity Need Identified in the IRP.

As we discussed in our Initial Petition, Sherco Solar is a competitively priced project that was the least-cost resource in the RFP in which it was selected. It compares favorably not only to the other bids in that RFP, but also all other projects in the Upper Midwest for which there is publicly available pricing information.

If approved, Sherco Solar would be the least-cost solar resource in all of the Northern States Power (NSP) system when installed. Not only is it lower cost on an LCOE basis than *any other* solar facility currently operating on the NSP system, it is *approximately half* the price of the average Community Solar Garden (CSG) project, which currently represents the majority of the solar energy production in the Company's system. Further, unlike the significantly higher-cost CSG program, which disproportionately benefits commercial and industrial customers at the expense of residential and lower-income customers, Sherco Solar will benefit all our customers equally.

The most recent and analogous developments to Sherco Solar can be found in neighboring Wisconsin. In our Initial Petition, we highlighted Wisconsin Power and Light Company (WPL) and its first tranche of solar projects that were filed in May 2020, including 675 MW spread across six different sites.⁷ Since that time however, WPL has filed additional information, which better reflects current supply chain constraints and the latest market conditions. Specifically, in February 2022 (before

⁶ Xcel Energy, Letter – Status Update, Docket Nos. E002/M-19-33 and E002/M-21-222, June 2, 2022, pages 1-2.

⁷ Wisconsin Public Service Commission, Case No 6680-CE-182, May 29, 2020.

the announcement of the DOC’s investigation), WPL filed pricing information for the second tranche of its solar projects, which is made up of 414 MW of solar resources across six different sites. The estimated costs for this second tranche is \$660 million or \$1,594/kWac (excluding AFUDC). Furthermore, WPL noted that the applicability of trade tariffs could further increase the total project cost up to \$685 million or \$1,655/kWac (excluding AFUDC), which is **[PROTECTED DATA BEGINS PROTECTED DATA ENDS]**, but offers substantially less production.⁸

In addition to this data point from WPL, recent industry data on PPA prices is consistent with our updated pricing for the Project. Edison Energy’s Q1 2022 Renewables Market Update – which was released before the announcement of the DOC’s investigation – found that solar PPAs in MISO included projects priced at approximately \$60/MWh and, in PJM and SPP, there were projects well above \$60/MWh.⁹

Furthermore, current market dynamics – including global supply chain shortages, rising commodity prices, transmission constraints, interconnection process delays, and an overall inflationary environment – continue to contribute to significant cost increases, project delays, and/or project failures. In the most recently available data from the U.S. Energy Information Administration’s EIA-860 report, there were more than 1,000 MW of “cancelled” solar projects reported in 2020 alone.¹⁰ In the Company’s Colorado service territory, we have recently seen six different solar or solar-plus-storage bids from four different companies fail due to an inability to maintain bid price during PPA negotiations or permitting challenges.

A March 31, 2022 industry article quotes Shawn Rumery, SEIA’s senior director of research on the cause of recent solar project delays and cancellations:

The project delays and cancellations are not only due to delays in getting products that go into developing a solar project, they’re also because prices have been going up very quickly at the same time, thanks to those supply chain constraints and inflationary pressures.¹¹

⁸ Wisconsin Power and Light Company, Post-Hearing Brief (Docket No. 6680-CE-183), February 11, 2022, page 13.

⁹ Edison Energy, Renewables Market Update, Q1 2022, page 8.

¹⁰ U.S. Energy Information Administration (EIA), EIA-860 Report, September 9, 2021, <https://www.eia.gov/electricity/data/eia860/>.

¹¹ Utility Dive, “Supply-chain squeeze: Solar, storage industries grapple with delays, price spikes as demand continues to grow,” March 31, 2022, <https://www.utilitydive.com/news/solar-storage-delays-price-supply-chain/620537/>.

As we alluded to earlier with the cost of WPL's solar projects, these macroeconomic trends were already beginning to impact solar projects in the Midwest even before the DOC's investigation. While WPL's second tranche of projects has been approved, WPL recently adjusted its capital cost assumptions to reflect the market challenges facing its solar projects (Docket No. 6680-CE-183). As WPL stated in a post-hearing brief filed on February 11, 2022:

Third, and perhaps most importantly, WPL updated its capital cost assumptions for constructing new solar generation to reflect macroeconomic trends that have placed upward cost pressure on solar resources following the global pandemic. Prices for commodities like steel, silver, polysilicon, and copper (the raw materials used in solar panels and other components) have increased to two- or three-times pre-pandemic levels. Freight and transportation costs have also skyrocketed, and there are significant bottlenecks at American ports. These issues directly impact the cost and schedule for constructing solar projects in America, since many materials (especially panels) are imported. American trade policy has also significantly impact on the cost of solar equipment: an anti-dumping petition before the U.S. Department of Commerce created significant supply and price disruptions in the market for solar cells and panels, and the Biden Administration recently decided to extend existing tariff rates on imported solar cells, subject to certain caveats.

WPL observed firsthand the impact that these broader market and supply chain disruptions, which are beyond its control, have had on developing the Solar Projects. At the time WPL filed its updated application in this proceeding in September 2021, it worked to lock in pricing for key project components, including panels, racking, and inverters. As a result of these developments, the Blueprint analysis in this proceeding reflects a \$685 million (\$1,655/kWAC) cost estimate for the Solar Projects.¹²

¹² Wisconsin Power and Light Company, page 13.

Similarly, and as noted earlier, the project developer for the Company's approved 80 MW Elk Creek Solar Project declared Force Majeure in October stating that it could no longer meet its already-extended target completion date of May 2023 due to significant delays in the MISO interconnection study process. While the Company continues to explore potential solutions with the project developer to eventually bring that project to completion for our customers and the Renewable*Connect program, the situation further underscores the delays currently facing all renewable energy projects in the MISO interconnection queue process and the importance of reutilizing existing interconnection rights to avoid such lengthy delays.

Although project costs across the industry are on the rise with supply chain issues and inflation affecting costs, we are confident in our ability to deliver the Project at our updated cost (and with the additional customer protections) if we receive a Commission decision by September 15, 2022 and can order solar panels immediately thereafter.

C. Sherco Solar is Better Than Alternative Resource Types.

In both this docket and others, parties have raised concerns that higher solar prices may require a re-evaluation of the IRP, including baseload retirement dates and capacity expansion plans. Based on the extensive record in our IRP proceeding and current market conditions, we do not believe the addition of an alternative resource, such as a combustion turbine (CT), or the extension of an existing coal unit are desirable alternatives to Sherco Solar.

Critically, we note that solar costs are not the only resource prices that have dramatically increased in the past few months. Natural gas prices are currently substantially higher than the costs modeled in our IRP, in part due to structural shifts in global demand for US-produced natural gas, and it is hard to predict when and to what extent prices will decline longer term. To the extent that natural gas is often the marginal fuel in our region, these price increases also affect the market price of electricity. While we do need firm dispatchable generation on our system long term, and gas CTs can be the right solution for that need, we believe that Sherco Solar – which is a clean solar project with very low ongoing costs and virtually no commodity uncertainty once installed – is the best resource option available to us at this time to fulfill our capacity needs and increase clean energy on our grid to continue reducing customer exposure to fuel volatility. Similarly, as documented in our recent fuel proceedings, we have seen costs for coal increase significantly over the past year. And, unlike a CT addition or extension of one of our coal units, Sherco Solar will substantially contribute to increasing the amount of carbon-free energy on our system.

D. Our Upcoming Solar and Solar-Plus-Storage RFP Will Provide Confirmation of Current Solar Prices.

On July 20, 2022, the Company filed an Informational Compliance Filing on our upcoming solar and solar-plus-storage RFP, which aims to fulfil the remainder of the 1,300 MW of solar resources needed online by 2026, as approved by the Commission in its April 15, 2022 Order on our IRP.¹³ Our forthcoming RFP represents an important step in bringing additional clean energy resources online for our customers as we retire our remaining coal plants.

As discussed in the Informational Filing, we will follow the Commission-approved Modified Track 2 solicitation process for this RFP, which we plan to launch on August 1, 2022. This wide-ranging RFP seeks solar or solar-plus-storage hybrid projects across a broad geographic area; utilizing various points of interconnection, including distribution-interconnected assets; in a broad range of configurations and sizes down to 5 megawatts; and with various project ownership structures including Company ownership through build-transfers or self-builds, as well as power purchase agreements (PPAs).

Given the significant volatility in the solar market since filing our Initial Petition for the Sherco Solar Project, and the concerns raised by the OAG and Department on the results of our Sherco Solar RFP, we believe the upcoming RFP offers a beneficial opportunity to confirm the Project's pricing. We have agreed with the Department to compare the revised pricing presented in this supplemental filing to this forthcoming RFP and impose a price cap that ensures the Project would have been selected in the RFP.

Specifically, the Department has indicated its support for the Project, and its recovery through the Renewable Energy Standard (RES) Rider, with the following conditions:

1. If the forthcoming RFP does not result in sufficient projects to meet the need identified in Order Point 2.a.5 of the IRP Order without also constructing Sherco Solar (in other words, if less than 300 MW of company-owned projects interconnecting at Sherco and an additional 600 MW of solar resources unconstrained by interconnection location or ownership pass through both the completeness and threshold reviews of the RFP, excluding those that are not selected for shortlisting by the Company due to factors

¹³ Xcel Energy, Informational Compliance Filing (Docket No. E002/RP-19-368, E002/M-22-403), July 20, 2022.

outside the Company's control (e.g., the bidder opts to sell the project or energy from the project to a different party)), such that Sherco Solar would have been selected in the RFP were it to be bid in, then rider recovery for Sherco Solar is capped at the revised pricing discussed in this filing.

2. If the forthcoming RFP results in sufficient projects to meet the need identified in Order Point 2.a.5 of the IRP Order without also constructing Sherco Solar (in other words, if 300 MW or more of company-owned projects interconnecting at Sherco and 600 MW or more of additional projects unconstrained by interconnection location or ownership pass through both the completeness and threshold reviews of the RFP, excluding those that are not selected for shortlisting by the Company due to factors outside the Company's control), then rider recovery for Sherco Solar is capped at the lower of the dollar per kw of (1) the revised pricing discussed in this filing or (2) the highest-priced completed project selected in the RFP (meaning, on time, all proposed MW, using union labor), thereby ensuring customers only pay costs for Sherco Solar at an amount that would have been selected in the RFP.

We have discussed this approach with several stakeholders and believe it should help alleviate any concerns regarding our past RFP and the cost of the Project.

To reiterate, however, we believe there are important reasons that the Sherco Solar Project should not be rebid as part of the upcoming RFP process. The Project's schedule has already been truncated due to the DOC's investigation, and further delaying approval would jeopardize meeting our approved resource needs, maintaining valuable interconnection rights, and delivering the Project's many benefits to our customers and host communities. Since the Sherco Solar Project would be the first solar resource acquired as part of our approved IRP, any further delays to this Project will result in delays to our entire solar portfolio. At this time, we do not anticipate any projects selected from the upcoming solar RFP would be brought forth for final Commission approval until sometime in 2023.

We believe this balanced approach will allow the Company to proceed with important, time-sensitive construction activities for the Sherco Solar Project while also ensuring that the final project costs remain competitive, and in the public interest.

E. The RFP that Resulted in the Selection of Sherco Solar was Successful.

Notwithstanding our agreement to compare the Project to our forthcoming RFP, we briefly reiterate that the RFP that resulted in the selection of the Sherco Solar Project was also a success.

The RFP process, which followed the Commission-approved Modified Track 2 acquisition process, was carefully designed to identify the least-cost replacement resource for Sherco 2 considering the available alternatives and risks. The very first filing in this docket was our initial notice for an upcoming RFP on December 18, 2020, which notified the Commission, stakeholders, and potential bidders of the forthcoming RFP multiple weeks in advance of its launch. The RFP and instructions were published on the designated webpage on January 4, 2021 and were publicized with both a press release and a pre-release notice to the North American Energy Markets Association (NAEMA), whose membership includes several renewable energy developers. Based on these actions, the Department concluded that the Company “made reasonable efforts to publicize the RFP.”¹⁴

After issuance of the RFP, there was substantial interest, generating many questions from potential bidders, and ultimately resulting in three final bid submissions that we reviewed under the oversight of an independent auditor (IA), Guidehouse. Neither the IA or any developers participating in the RFP raised any objection before, during, or after the selection process.

Notably, the IA report, which was included as Attachment B to our Initial Petition in this docket on April 12, 2021, offers a credible, unbiased assessment on the effectiveness of our solicitation process. As the IA report states:

Guidehouse completed its assessment with respect to the Sherco RFP and found the following:

- Guidehouse’s overall assessment is that the goals of the RFP were achieved. With respect to number of bidders, three (3) respondents submitted a total of three (3) proposals. We believe three (3) respondents provides a sufficient range of choices and competition to the Company, considering the (i) very specific nature of the RFP, (ii) the need to interconnect

¹⁴ Minnesota Department of Commerce, page 17.

at the current SherCo interconnection site to reduce costs on ratepayers, and (iii) the large size requirement of the project (>75 MW).

- Guidehouse noted that the Company performed a “Market Assessment Report” in advance of the solicitation to understand the potential universe of bidders and eligible projects, and the total MW of projects submitted (985 MW) is within a reasonable range of the universe of projects within a 40 mile radius of the SherCo Interconnection Site (1,100 MW) as per the “Market Assessment Report”
- Additionally, Guidehouse noted that the Company provided an advanced press release prior to RFP date to provide bidders additional time to perform pre-work on bids. This letter was filed with the PUC on December 18th, 2020, and was sent to a large listserv including various developers. Refer to Appendix A for the specific letter document included.
- The completeness and threshold evaluations were performed on a fair and consistent basis with the evaluation process published in the RFP. Respondents were given an opportunity to cure their deficiencies within a reasonable time period.
- The Company documented detailed rationale behind why it provided specific scores for each proposal, including citing where the Developer’s documentation (or lack thereof) supported each score.
- The Company sent several detailed emails and correspondences to Developers where there was a lack of information or unclear information, and provided ample opportunity to cure deficiencies.
- With respect to messages between the Company, interested parties, and respondents, Guidehouse observed that the Company’s responses were timely, consistent, and fair, indicating a high level of engagement by the Company. The Company did not bias its responses to favor one technology or party, and interested parties and respondents appeared generally satisfied and appreciative of the responses. The

Q&A document released by the company was clear, consistent, and valuable to interested parties and respondents in that it further defined the Solicitation.

- There is no evidence that the evaluation and selection process caused any unfair advantage or disadvantage to any interested party or respondent.¹⁵ (Emphasis added.)

Additionally, while there were certain limitations imposed on the bid process in order to identify projects that could specifically interconnect at the Sherco substation, those limitations were necessary given the goals of the RFP and FERC rules governing the reuse of interconnection rights. Moreover, these limitations have since been affirmed by the Commission for similar RFP processes going forward following the recently approved IRP. As discussed in our IRP, existing rules do not allow the owner of an existing facility to submit a request for a third party to build a replacement facility that will use the owner's existing interconnection rights. Thus, we only allowed Company self-build or build-transfer (BT) proposals in our RFP to protect these interconnection rights for our customers.

In our Initial Petition, we estimated that the potential opportunity cost of foregoing reutilization of Sherco 2's interconnection rights could range from approximately \$140 million to \$350 million, based on our estimated interconnection costs for resources that would go through the MISO interconnection queue. Now that we have more fully investigated the benefits of reutilizing all of our coal interconnection rights in the IRP, we have confirmed that it is possible to achieve higher levels of investment in renewables and higher levels of decarbonization than we would in a case where these rights were not reutilized primarily for renewables, while achieving substantially higher net savings for customers than our previously proposed plan.

Additionally, because we were seeking proposals only for projects that could reuse the interconnection rights at the Sherco substation, we limited the RFP to projects within 40 miles of that location. That cast a wide net of over 5,000 square miles within which a potential project could be located, while excluding only those projects that would have to make significant investments in transmission infrastructure to connect to the Sherco substation, thereby making them noncompetitive. These limitations, therefore, were appropriate and did not impact the competitiveness of the RFP process.

¹⁵ See Xcel Energy Sherco Solar RFP 2020-2021, Closing Report of Guidehouse, Inc, as Independent Auditor, Executive Summary, pages iii-iv.

F. The Sherco Solar Project Will Provide Numerous Benefits Beyond the Energy it Produces.

In addition to the Sherco Solar Project being the least-cost resource to satisfy an identified need in our recently approved IRP, the Project has numerous other benefits that we discuss in this section. First, as a Company-owned solar development, we can pass any applicable benefits from potential future tax reform on to our customers. Second, by being located proximate to the Sherco plant, the Project will support the just transition for workers at the plant, along with the broader community, as we retire all the coal units over the next eight years. Third, the Project will provide an optimal opportunity for supporting our recently approved Workforce Development and Training pilot program. Fourth, the Project has been designed to minimally impact the state's prime agricultural land and will employ best practices to ensure the land is productive into the future and ecologically sustainable during the operation of the facility. Fifth, the Project will result in a dramatic reduction in carbon emissions and other criteria pollutants. Finally, the Project provides a unique opportunity to study the ecosystem benefits offered by solar projects, and we have provided a letter of support for a research project proposed by Great Plains Institute.

i. The Company will provide customers with all incremental tax benefits for the Project.

In addition to being required by FERC rules, Company ownership of the Sherco Solar Project provides significant advantages to our customers. Most notably, unlike a PPA price that is set at a point in time and generally cannot be adjusted, when the Company owns a renewable facility, we are able to obtain, and pass on to our customers, incremental project benefits that may not have been available at the time the Project was acquired or approved. For example, with the recently completed Dakota Range wind facility, the Company found an opportunity to dramatically increase the benefits for customers when the PTC for wind was extended.

As detailed in our October 9, 2020 letter in Docket No. E002/M-16-777, the Company took advantage of an opportunity presented by modified IRS guidance due to the COVID-19 pandemic and industry-wide construction challenges and was able to increase the PTC for Dakota Range I and II from 80 percent to 100 percent. We expect these efforts to provide an additional \$80-90 million of benefits over the project life of Dakota Range.

We note that capturing these additional cost savings required a significant undertaking, made possible by the proactive work of our internal teams and the scale of our renewable development efforts across our operating companies. Given the sheer size of the wind portfolio Xcel Energy is developing – across NSP and our

other operating companies – we maintain an inventory that allows some flexibility in directing components to the various projects under development. In the case of Dakota Range, we were able to direct certain turbine components – originally intended for another project in another jurisdiction – for use on the Dakota Range I and II project, thereby qualifying for the increased PTC while not adversely affecting the timelines for our other projects.

The Company will soon be developing a similarly expansive solar portfolio that will provide us similar flexibility and the opportunity to strategically deploy components to benefit our customers. Just as we worked to pass on additional tax benefits to our customers from Dakota Range, in the event that federal tax reform legislation is passed in the future – or other opportunities for benefits materialize – we are committed to passing any applicable cost savings onto our customers. The same is not guaranteed for third party-owned projects.

- ii. The Project will help ensure a just energy transition for the workers and communities impacted by the retirement of Sherco.*

Given the unique nature of the Sherco Solar Project as a partial replacement of a coal unit at the Sherco station, we are focused on how the Project can support a just energy transition for the workers at the plant and for the host community.

As the Company and industry continue to transition from existing fossil fuel resources to more carbon-free resources, there needs to be a clear acknowledgement of the economic impacts of such decisions on local communities by all stakeholders – not only by the Company, but also by our regulators, intervening government agencies, environmental groups, and consumer protection groups. It is a lens through which we believe resource acquisition filings should be assessed. With that in mind, we look forward to continuing to work with our impacted communities, impacted workers, and the Minnesota Department of Employment and Economic Development (DEED), as well as other key government agencies and stakeholders on Minnesota’s forthcoming Energy Transition Plan.

As demonstrated by the local community support in the record, Sherco Solar is an important part of the energy transition for the City of Becker, Becker Township, Clear Lake Township, and other surrounding communities impacted by the retirement of the Sherco generation facility. In real terms, the Sherco Solar Project will translate to significant local jobs and economic benefits, creating more than 900 well-paying construction jobs and \$115 million in wages across three years of construction activities. It will also offer an important career pathway for Sherco plant workers

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interested in transitioning to solar. Additionally, over the life of the Project, Sherco Solar will generate \$240 million in local economic benefits (including landowner payments and state and local taxes), offering critical support to the local economy after the retirement of the Sherco plant.

- iii. The Sherco Solar Project is uniquely positioned to support the recently approved Workforce Training and Development pilot program, which aims to develop and diversify Minnesota's energy and construction workforce.*

Ensuring a just energy transition is not only about demonstrating a commitment to our impacted host communities and workers, but also about actively engaging communities and workers that have historically been left out of the energy industry. The Sherco Solar Project represents a unique opportunity to create new career pathways and diversify the energy related construction, particularly among women, people of color, and veterans who are currently underrepresented in the energy construction industry and building trades.

The Company's approved Workforce Training and Development pilot program, called Xcel Energy's Power Up program – which is being developed in partnership with DEED, key community organizations and the trades – aims to engage traditionally underserved communities and offer the opportunity to receive hands-on skills training through a 13- to 20-week construction apprenticeship-readiness program.

The program's first hands-on opportunity will be at the Sherco Solar Project. Sherco Solar is particularly well-positioned to support the pilot given its location in Becker, which is only 45 miles from Minneapolis and 20 miles from St. Cloud. Unlike other renewable development in the state, which is focused in far southern and western Minnesota, this Project is near the communities Xcel Energy's Power Up program is designed to serve. As a result, if the Project is delayed or not approved, there could be corresponding impacts to this new pilot program.

- iv. The Project will avoid impacts to prime farmland and employ best practices to restore the land and maintain it as a pollinator-friendly solar facility.*

In addition to its benefits for the local community, the location of the Sherco Solar Project is particularly beneficial for the environment and agriculture. Important considerations in the siting of any utility-scale renewable energy project development include its proximity to:

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- Prohibited areas, including national parks, national historic sites, national wildlife refuges, national monuments, state parks and other natural and recreational areas;
- Exclusion areas, including state registered historic sites, state historic districts, state Wildlife Management Areas (WMAs), county parks, metropolitan parks, designated state and federal recreational trails, designated trout streams, and state water trails; and
- Prime farmland or farmland of statewide importance.

The Sherco Solar Project is not located within any prohibited or exclusion areas. Furthermore, none of the land on which the Sherco Solar Project will be constructed is considered prime farmland or farmland of statewide importance, which is unusual for a solar project of this scale, but makes it particularly well-aligned with state policy.¹⁶

While there is no prime farmland in the Project area, the Company voluntarily developed an Agricultural Impact Mitigation Plan (AIMP) detailing our plan to minimize soil compaction, preserve topsoil, and establish and maintain appropriate vegetation that will help to ensure the Project is designed, constructed, operated, and ultimately decommissioned and restored in a manner allowing the land to be returned to its original agricultural use in the future.

Furthermore, the Company is committed to revegetating the Project with a native prairie mix that will provide beneficial habitat. The mixes are designed to include both native grasses and wildflowers and achieve our goal of operating a pollinator-friendly solar facility by providing native perennial vegetation and foraging habitat beneficial to game birds, songbirds, and pollinators. The Company intends to follow the guidance set forth by the Minnesota Board of Water and Soil Resources (BWSR) to meet the standards of the Habitat Friendly Solar Program. In addition to promoting pollinator habitat, we will implement a broader Vegetation Management Plan (VMP) that will establish stable groundcover, reduce erosion, reduce runoff, and improve infiltration.

¹⁶ Subject to certain exceptions, Minnesota Rules 7850.4400, subp. 4 prohibits large energy power generating plants from being sited on more than 0.5-acre of prime farmland per MW of net generating capacity unless there is no feasible and prudent alternative.

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- v. The Project will result in a dramatic decrease in carbon emissions and other criteria pollutants.*

In recent years, the existing Sherco Unit 2 has emitted between 3 and 5 million tons of CO₂, nearly one million pounds of sulfur dioxide (SO₂), and 3 to 6 million pounds of nitrous oxide (NO_x) annually. These air emissions will be substantial until we fully conclude operations at the unit at the end of 2023.

The Sherco Solar Project will be the first step in replacing this resource with 100 percent renewable and air emissions-free energy for our customers. In addition to the emissions avoided by retiring Sherco Unit 2, the Project will produce clean energy for all of our customers, avoiding a further 250,000 to 300,000 tons of carbon emissions (in addition to other criteria pollutants) annually. We estimate the annual carbon reduction to be the equivalent of taking approximately 60,000 gas-powered cars off of the road every year.

- vi. Sherco Solar offers a unique research opportunity to study the ecosystem benefits of solar projects.*

Beyond our Agricultural Impact Mitigation Plan and VMP, we are also working with Great Plains Institute (GPI) on a potential funding opportunity from the U.S. Department of Energy (DOE) for “Deploying Solar with Wildlife and Ecosystem Services Benefits (SolWEB).”

The proposal is in partnership with multiple state agencies, including: the Department of Commerce (EERA), Department of Natural Resources (DNR), Minnesota Pollution Control Agency (MPCA), Minnesota Board of Water and Soil Resources (BWSR), and the Minnesota Department of Agriculture (MDA), and possibly the Environmental Quality Board (EQB). The proposed research—which we expect will be conducted by the University of Minnesota—will be centered on the ecosystem services that solar farms can provide to host communities and broader natural systems. The Sherco site is both large enough and integrated into multiple types of natural systems to be a great place for conducting research on host community benefits.

G. Any Delay in a Project Decision Could Significantly Impact Project Pricing, Timing, Jobs, Economic Benefits, and Interconnection Rights.

The Sherco Solar Project was brought forward in response to a request from the Commission for utility investments that could assist the state in recovering from the COVID-19 pandemic. We originally forecasted that work would begin in the summer

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of 2022. Assuming a decision in this docket and on our Site and Route Permits is received in September, we anticipate that construction would begin in late October 2022. Were a decision on the Project to be delayed beyond September 15, 2022, however, that could increase risk for meeting the solar needs identified in our IRP, developing the necessary supporting supply chain and workforce, reutilizing the interconnection rights, and securing the many benefits presented by the Project, including well-paying jobs, new workforce training opportunities, and significant local economic benefits.

Most importantly, as the Commission recently affirmed in its IRP decision, the Company should take action to reuse the interconnection rights associated with its retiring coal units to add renewable resources. As currently scheduled, Sherco Solar is well-positioned to be the first such replacement. If a decision on the Project is delayed at all, or if the Project is not approved, however, there is a significant risk that the Company will be unable to fulfill our solar resource needs, a significant magnitude of which we need to be in-serviced by the end of 2025. If the Project were delayed to simply allow parties to compare bids from our upcoming IRP RFP against the price of the Sherco Solar Project, that would delay the Project by at least one additional year and place the final commercial operation date very near the deadline for reusing our Sherco 2 interconnection rights at the end of 2026. This becomes an even greater concern when considering that approximately 300 MW of additional resources acquired through the upcoming RFP also need to be designed, procured and constructed by the end of 2026 in the same general area.

As soon as we receive a Commission decision on the Project, we plan to immediately place our order for solar panels. Any delay in a decision beyond September 15, 2022 will also delay our solar panel order and push us into the next construction season at best. With a current project in service date of the fourth quarter of 2025, and our Sherco 2 interconnection rights set to expire in the fourth quarter of 2026, the project schedule simply cannot afford any further delays.

More consequentially, the Sherco Solar Project is the first project planned in a significant portfolio of solar generation projects to support our recently approved IRP and our efforts to acquire 1,300 MW of solar by the beginning of 2026. As part of this first project, we have planned to focus on building and strengthening the supply chain and the local union workforce needed to develop our solar portfolio efficiently and successfully. As we move beyond the first few projects in the portfolio, there will be an increased ability to complete construction of more generation on a year-over-year basis. However, any additional delays with the Sherco Solar Project may negatively impact our ability to execute on future projects.

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From a project management perspective, there are several other considerations that become complicated by delaying a decision on the Project. First, there are seasonal weather implications related to constructing a project of this magnitude in a northern climate zone. The Project is currently timed so that final engineering, procurement, and certain field activities can be completed before winter in the third quarter of 2022 to help support a ramp up of construction activities in the second quarter of 2023. To place the required major equipment orders and make any necessary down payments for the Project amid the current supply chain shortages, the Company needs approval from our regulators.

Apart from these construction and procurement challenges, if the Project is delayed beyond September or not approved, the following worker, community and customer benefits will also be delayed or lost:

- 900 union construction jobs with an estimated \$115 million in wages from nearly over the course of three years, which could otherwise begin in October 2022;
- 75 participants from the recently approved Workforce Training and Development pilot program, which would begin in 2023 and with the potential for more participants in subsequent years; and,
- \$240 million in local benefits (including landowner payments and state and local taxes) over the life of the Project, which is critical for the local economy.

Beyond the clear consequences of delay, there is no evidence that delaying approval of the Project, or requiring it to re-bid into another RFP, will result in customer benefits. In fact, at this point, inaction may be the costliest option for our customers.

H. The Sherco Solar Project Has Strong Support from a Broad Cross-Section of Stakeholders.

Given the extensive energy, environmental, and economic benefits presented by the Sherco Solar Project, the Project has received support from a broad cross-section of stakeholders. We continue to engage with all stakeholders to ensure the Project leads to an optimal outcome for our impacted communities, workers, and customers.

Importantly, we have worked extensively and have found full alignment with the City of Becker and Becker Township, such that they are in now full support of the Project. And, as discussed above, we have reached an agreement with the Department to ensure the Project's pricing would have been selected in our forthcoming RFP, and therefore is in customers' interest. Below is an extensive list of the communities,

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environmental organizations, farmers, labor groups, landowners and other key stakeholders that have recognized the important benefits offered by the Sherco Solar Project and have expressed strong support for the Project:

- City of Becker;
- Becker Township;
- Big Lake Sno Cruisers (BLSC), a local snowmobiling club that helps maintain more than 140 miles of trails in the surrounding area;
- BlueGreen Alliance;
- Center for Energy and Environment (CEE), which led an important study on the impact of power plant closures on Minnesota's host communities;
- Clean Energy Organizations (Fresh Energy, Clean Grid Alliance, Minnesota Center for Environmental Advocacy and Sierra Club);
- Clear Lake Township;
- Friends of the Mississippi River;
- International Brotherhood of Electrical Workers (IBEW), Local 292;
- International Union of Operating Engineers, Local 49;
- LIUNA Minnesota & North Dakota;
- Minnesota Department of Commerce;
- The Nature Conservancy;
- Neighboring landowners (Kendra Jaeger and Mike Braddock);
- North Central States Regional Council of Carpenters;
- Participating landowners (Del Hayes & Sons Inc., Kevin & Jean Goenner, Loretta Rose Revocable Trust);
- Pillsbury United Communities;
- R.D. Offutt (RDO) Farms; and
- Rep. Jamie Long, Chair, Climate and Energy Committee, Minnesota House of Representatives.

CONCLUSION

As Minnesota's largest solar development and the lowest cost solar resource on our system, the Sherco Solar Project will fulfill the solar resource needs approved as part of the Company's IRP, reutilize valuable, time-sensitive interconnection rights, create

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hundreds of well-paying jobs, generate millions in local economic benefits, and advance a just clean energy transition for our impacted communities and workers, our customers, and Minnesota as a whole. With the updated pricing information and additional customer protections presented in this filing, we request that the Commission:

- Approve the Company's acquisition and construction of the 460 MW Sherco Solar Project subject to the following conditions:
 - If the forthcoming RFP does not result in sufficient projects to meet the need identified in Order Point 2.a.5 of the IRP Order without also constructing Sherco Solar (in other words, if less than 300 MW of company-owned projects interconnecting at Sherco and an additional 600 MW of solar resources unconstrained by interconnection location or ownership pass through both the completeness and threshold reviews of the RFP, excluding those that are not selected for shortlisting by the Company due to factors outside the Company's control (e.g., the bidder opts to sell the project or energy from the project to a different party)), such that Sherco Solar would have been selected in the RFP were it to be bid in, then rider recovery for Sherco Solar is capped at the revised pricing discussed in this filing.
 - If the forthcoming RFP results in sufficient projects to meet the need identified in Order Point 2.a.5 of the IRP Order without also constructing Sherco Solar (in other words, if 300 MW or more of company-owned projects interconnecting at Sherco and 600 MW or more of additional projects unconstrained by interconnection location or ownership pass through both the completeness and threshold reviews of the RFP, excluding those that are not selected for shortlisting by the Company due to factors outside the Company's control), then rider recovery for Sherco Solar is capped at the lower of the dollar per kw of (1) the revised pricing discussed in this filing or (2) the highest-priced completed project selected in the RFP (meaning, on time, all proposed MW, using union labor), thereby ensuring customers only pay costs for Sherco Solar at an amount that would have been selected in the RFP.
- Authorize the Company to recover costs of the Project through the RES Rider.

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We appreciate the Commission's time with and consideration of this matter and respectfully request a Commission decision as soon as possible in order to deliver the Sherco Solar Project – as well as the entire portfolio of renewables approved in our IRP – and maintain our interconnection rights.

Dated: July 27, 2022

Northern States Power Company

CERTIFICATE OF SERVICE

I, Mustafa Adam, hereby certify that I have this day served copies 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

or

xx electronic filing

Docket No. E002/M-20-891

Dated this 27th day of July 2022

/s/

Mustafa Adam
Regulatory Administrator

[illegible]

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