



April 30, 2021

Via eDockets

Mr. Will Seuffert
Executive Secretary
Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101-2147

RE: Draft Site Permit Comments and Recommendations
Sherco Solar Project
Docket No. E002/M-20-891

Attached are the comments of the Minnesota Department of Commerce Energy Environmental Review and Analysis (EERA) staff on the question of the Certificate of Need applicability for the Xcel Energy/National Grid Renewables proposed Sherco Solar Project. The Project represents a joint development between Xcel Energy and National Grid Renewables Development, LLC.

The Site and Route Permit Applications were filed on April 20, 2021, by:

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EERA staff recommends the Minnesota Public Utilities Commission hold any decision on acceptance of the Sherco Solar Site and HVTL Route permit applications (E002/GS-21-191, TL-21-190, and TL-21-189) until a decision is made on whether a Certificate of Need proceeding is required for the proposed project.

Staff is available to answer any questions the Commission might have.

Sincerely,

William Cole Storm
Environmental Review Manager

cc: Louise Miltich, Energy Environmental Review and Analysis
Bret Eknes, Public Utilities Commission

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BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**ENERGY ENVIRONMENTAL REVIEW AND ANALYSIS
COMMENTS AND RECOMMENDATIONS****IN THE MATTER OF THE APPLICABILITY OF A CERTIFICATE OF NEED FOR THE XCEL ENERGY/NATIONAL GRID
RENEWABLES PROPOSED SHERCO SOLAR PROJECT
DOCKET No. E002/M-20-891**

Date: April 30, 2021

Staff: William Cole Storm | bill.storm@state.mn.us | 651-539-1844

Issues Addressed:

On April 16, 2021, the Minnesota Public Utilities Commission (Commission) opened a comment period under docket number E002/M-20-891, seeking input on whether the proposed Sherco Solar Project requires a Certificate of Need (CON) from the Commission. Topics open for comment include:

- *Does the Sherco Solar project require a Certificate of Need? If not, under which exemption does it qualify? If a CON is required, what process should the Commission apply to the proposal?*
- *Does the Commission have sufficient information to evaluate whether the Sherco Solar project is needed and cost-effective? In particular:*
 - *Is capacity expansion modeling needed to evaluate the project, and if so, what modeling should be required?*
 - *Does the Petition adequately explain how the Company will assign all of NSPM's benefits from the project to Minnesota?*
 - *Does the Petition include sufficient information about the cost-effectiveness of the Project under the proposed jurisdictional cost allocation method?*
 - *Is there any other information not included in the filing that the Commission or interested parties will require in order to evaluate the proposal in a timely manner?*
- *Are there other initial concerns or procedural issues that the Commission should consider at this time?*

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Introduction and Background

On April 12, 2021, Northern States Power Company, doing business as Xcel Energy, filed a Petition for Approval for the Company to develop, own and operate 460 MW of gridscale solar photovoltaic (PV) capacity near the Company's Sherburne County (Sherco) generation facility site.

On April 20, 2021, Xcel Energy (Applicant) submitted a site permit application and two high voltage transmission line (HVTL) applications to the Minnesota Public Utilities Commission (Commission) under the alternative review process (Minnesota Statute 216E.04; Minnesota Rule 7850.2800-3900) for the Sherco Solar Project.

Project Purpose and Description

The Project is proposed due to ceasing operations of Unit 2 of the Sherco Generating Plant which will cease operations by the end of 2023. The Commission previously approved ceasing operations of Unit 2 and upon cessation, existing interconnection capacity must be repowered or retired by Xcel Energy under the Midcontinent Independent System Operator (MISO) generating facility replacement process.

The Applicant states that the Project will replace a portion of the nearly 700 MW of energy generated by Unit 2 of the Sherco Generating Plant. The Applicant states that his plan represents a key milestone step in Xcel Energy's clean energy transition, which targets 100 percent carbon free electricity by 2050 and 80 percent less carbon by 2030. The addition of this resource will increase the solar energy produced on Xcel Energy's system by more than 40 percent from currently expected levels and increase the system to a total of approximately 40 percent renewable energy.

Xcel Energy has indicated that they decided to accelerate its plans to add solar generation capacity at the Sherco Generating Plant in response to the Commission's Inquiry into Utility Investments that May Assist in Minnesota's Economic Recovery from the COVID-19 Pandemic.

According to the Applicant, NG Renewables and Xcel Energy were each developing solar generation facilities adjacent to the Sherco Generating Plant prior to issuance of the RFP. NG Renewables was developing a project to the west of the Sherco Generating Plant and had secured purchase options and leases through its subsidiary, Sherco Solar, LLC (Sherco Solar) sufficient to site up to 230 MW of solar generating capacity. Xcel Energy was developing a project to the east of the Sherco Generating Plant and had secured land leases through an affiliate sufficient to site up to 230 MW of solar generating capacity. NG Renewables and Xcel Energy elected to combine the two developments into one project, the Project, with the goal of providing up to 460 of the 500 MW of solar energy capacity being requested by Xcel Energy in the RFP in a timely manner to maximize job creation during the COVID-19 pandemic.

Regulatory Process and Procedures (Site and Route Permit)

The Sherco Solar Project requires both site and HVTL route permits from the Commission.¹ Because the project is powered by solar energy it qualifies for the alternative permitting process.² The two HVTLs qualify for review under the Alternative Permitting Process because the length of each of the 345 kV lines is less than five miles.³ Applicants must provide the commission with written notice of their intent to file an application under the alternative permitting process,⁴ which was provided on March 22, 2021.⁵

Application and Acceptance

Site and Route permit applications must provide specific information.⁶ This includes, but is not limited to, information about the applicant, descriptions of the project and site, and discussion of potential human and environmental impacts and possible mitigation measures.⁷ Under the alternative permitting process an applicant is not required to propose alternative sites or routes; however, if alternatives were evaluated and rejected, the application must describe these and the reasons for rejecting them.⁸

Upon receiving a site and/or route permit application, the Commission may accept it as complete, reject it and advise the applicant of its deficiencies, or accept it as complete but require the applicant submit additional information.⁹ Upon acceptance of a site permit application the Commission must designate a public advisor.¹⁰ At this time, the Commission may appoint an advisory task force to aid in the environmental review process.¹¹ An advisory task force would assist Energy Environmental Review and Analysis (EERA) staff in identifying additional sites or particular impacts to evaluate in the environmental review document prepared for the project.¹²

Once the Commission determines an application is complete, the formal environmental review process can begin.

Environmental Review

The alternative permitting process requires completion of an Environmental Assessment (EA), which is prepared by EERA staff.¹³ An EA contains an overview of the resources affected by the project, and

¹ Minn. Stat. 216E.03, subd. 1 and 2.

² Minn. Stat. 216E.04, subd. 2(8).

³ Minn. Stat. § 216E.04, subd. 2(4) and Minn. R. 7850.2800, subp. 1(D).

⁴ Minn. R. 7850.2800, subp. 2.

⁵ Sherco Solar, Notice of Intent to File Site and Route Permits Under the Alternative Process, March 22, 2021. eDocket No. 20213-172092-03.

⁶ Minn. Stat. 216E.04, subd. 3; Minn. R. 7850.3100.

⁷ Ibid.

⁸ Ibid.

⁹ Minn. R. 7850.3200.

¹⁰ Minn. R. 7850.3400.

¹¹ Minn. Stat. 216E.08, subd. 1; Minn. R. 7850.3600, subp. 1.

¹² Minn. R. 7850.2400, subp 3.

¹³ Minn. Stat. 216E.04, subd. 5; Minn. R. 7850.3700, subp. 1.

discusses potential human and environmental impacts and mitigation measures.¹⁴ Under the alternative permitting process, an EA is the only required state environmental review document.

EERA conducts necessary public scoping meetings in conjunction with a public comment period to inform the content of the EA.¹⁵ The commissioner of the Department of Commerce or his designee determines the scope of the EA,¹⁶ and may include alternative sites suggested during the scoping process if they would aid the commission in making a permit decision.¹⁷

Public Hearing

The alternative permitting process requires a public hearing be held in the project area upon completion of the EA¹⁸ in accordance with the procedures outlined in Minnesota Rule 7850.3800, subpart 3.

The hearing is typically presided over by an administrative law judge (ALJ) from the Office of Administrative Hearings (OAH). The Commission may request the ALJ provide a summary of the hearing (summary report), or request the ALJ provide findings of fact, conclusions of law, and recommendations regarding the site and/or route permit applications (summary proceeding). (This hearing is not a contested case hearing and is not conducted under OAH Rule 1405.)

Final Decision

The Commission is required to make a permit decision within six months from the date an application is accepted.¹⁹ This time limit may be extended up to three months for just cause or upon agreement of the applicant.²⁰

Regulatory Process and Procedures (CN Environmental Review)

Typically, a CN is required for all “large energy facilities,”²¹ unless the facility falls within a statutory exemption from the CN requirements.

The Sherco Solar Project is a generating plant larger than 50 MW and the West HVTL Project and East HVTL Project are HVTLs, each meet the definition of a large energy facility and would require a CN prior to issuance of a Site Permit and Route Permits.

Xcel Energy has taken the position that the Project, including the Solar Project, West HVTL and East HVTL Projects are all exempt from CN.

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¹⁴ Minn. Stat. 216E.04, subd. 5; Minn. R. 7850.3700, subp. 4.

¹⁵ Minn. R. 7850.3700, subp. 2.

¹⁶ Id. at subp. 3.

¹⁷ Id. at subp. 2.

¹⁸ Minn. R. 7850.3800, subp. 1.

¹⁹ Minn. R. 7850.3900, subp. 1.

²⁰ Ibid.

²¹ Minn. Stat. 216B.243, subd. 2; Minn. Stat. 216B.2421, subd. 2(1 and 2).

Certificate of Need Environmental Review

Applications for a CN require the preparation of an Environmental Report (ER).²² An ER contains “information on the human and environmental impacts of the [project] associated with the size, type, and timing of the project, system configurations (combination of generating, transmission, and distribution facilities), and voltage”.²³ It also contains information on alternatives to the project, as well as mitigation measures.

If an applicant for a CN applies for a site and/or route permit concurrently, or prior to scoping, EERA may elect to prepare an EA in lieu of an environmental report. If so, the EA must include the content required by Minnesota Rule 7849.1500.

If the site and route permitting process and CN determination are proceeding concurrently, the Commission may order that a joint hearing be held to consider both siting and need.²⁴

The Commission has 12 months to approve or deny a certificate of need from the date the application is filed.²⁵

EERA Staff Analysis and Comments

EERA provides technical expertise and assistance to the Commission.²⁶ EERA and the Commission work cooperatively, but function independently to meet their respective statutory responsibilities.

EERA takes no position on the question of whether the Sherco Solar Project requires a Certificate of Need from the Commission. However, if the Commission does grant an exemption, EERA recommends that the Commission clearly indicate the legal authority it is using. EERA believes this clarity is necessary to provide certainty for the Applicant, the government agencies, and members of the public about the environmental review processes that will be used.

Regulatory Review Process

While the timeline for the two regulatory review processes (Site/Route Permits vs CN) differs (six-month vs. one-year, respectively) the preparation of an EA in lieu of an ER for a CN does not lengthen the permitting processes. Additionally, joint environmental review is more easily understood and efficient for the public, local governments, and state and federal agencies, particularly with regards to comment periods.

EERA wishes to point out that the synergy (joint scoping, joint environmental review documents, and joint hearings) between the two processes (Site/Route Permits vs. CN) breaks down the further apart

²² Minn. R. 7849.1200.

²³ Minn. R. 7849.1500.

²⁴ Minn. Stat. 216B.243, subd. 4 (stating that unless a joint hearing is not feasible or more efficient, or otherwise not in the public interest, a joint hearing shall be held).

²⁵ Minn. Stat. 216B.243, subd. 5; Application at page 4 (the applicant anticipates the site permit decision to be made in summer 2020).

²⁶ Minn. Stat. 216E.03, subd. 11.

the application acceptance dates; therefore it is important that the Commission make a timely determination on the need for a CN process.

EERA Staff Recommendation

EERA staff recommends the Commission hold any decision on acceptance of the Sherco Solar Site and HVTL Route permit applications until a decision is made on whether a Certificate of Need proceeding is required for the proposed project.

William Cole Storm, Environmental Review Manager
Energy Environmental Review and Analysis
Department of Commerce

April 30, 2021

Date

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Comments

Docket No. E002/M-20-891

Dated this 30th day of April 2021

/s/Sharon Ferguson

[illegible]

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