



April 30, 2021

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

VIA ONLINE SUBMISSION ONLY

**RE: In the Matter of Xcel Energy's Petition for Approval of the Sherco Solar Project
PUC Docket No. E-002/M-20-891.**

Dear Mr. Seuffert and Commissioners:

The Township of Becker, Minnesota ("the Township") submits the following comments to the Minnesota Public Utilities Commission ("PUC" or "the Commission") on the above referenced docket and petition for approval ("the Sherco Solar Project" or "the Project"). Xcel Energy ("Xcel" or "the Company") has owned and operated the Sherco power plant adjacent to Becker Township for about fifty years.

We know and fully understand the changes the utility industry is undergoing. Specifically, and of great impact to Becker Township, is the decommissioning of the Sherburne County Generating Station. We, the Becker Town Board, take a piqued interest in the Sherco Solar Project docket due to its proposed location within Becker Township and the impact it will have on our transportation connections and business park.

In consideration of the recent Notification of a Proposed Project received from Sherco Solar, township staff has analyzed the project's impact and requests PUC consideration of the following items. The Township Board and its Road Committee have significant concerns regarding the proposed solar project on the Town's transportation system thus creating significant public safety and mobility hazards.

The Township comprehensive plan's various components are adopted as a guide for orderly development of land within the township. There is no template for a comprehensive plan to contemplate and provide for orderly infrastructure development when one project proposes developing 1,200+ acres of land within the township, and 3,400+ contiguous acres overall. A project of that magnitude and scope - as well as with the type of use proposed and its entitlement process - essentially preempts the Town's local land use plan, transportation plan, and zoning ordinance. That should not result in an excessive burden to the Township by allowing the project to preempt orderly development of remaining land in the area, negatively impact the safety of existing and future users, and hinder the transportation of people and goods on the local and regional arterial roads.

The transportation plan only guides the implementation of the network of major roadways: principal and minor arterials, and major and minor collectors. The local roads supplementing the system are determined based on orderly development, and are shown in the plan once constructed. The current

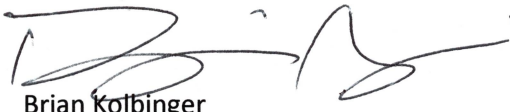
plan shows one major collector in the area, to be developed when needed in concert with the City of Becker's Transportation Plan. The Township has discussed three other options for roads in the area proposed for development (not based on the notification, but previously) in order to address growing safety concerns. The Township Engineer has provided detail of those concerns, backed by traffic study data. The Township asks the project owner and the PUC to ensure those three options and other potential options that will adequately address the safety and mobility concerns are addressed in the project review and approval process. It is imperative that all land south of Highway 10 – those parcels with existing uses and those potential uses outside of the project area - is not locked into unsafe access conditions because of the proposed development of 3,400+ acres. Cooperation to determine a network of roads to safely service those users is essential.

The Becker Town Board of Supervisors met with representatives from Xcel Energy and National Grid Renewables on February 9, 2021. During the February meeting, the Town Board articulated their concerns over transportation connections and their long range plan to implement road improvements in the interest of public safety. The Town Board clearly indicated its plans for road improvements were in conflict with the location of a portion of the Sherco Solar projects. Representatives from Xcel Energy and National Grid Renewables stated they want to work with Becker Township and asked that a copy of the plans be forwarded to them. The Becker Town Board interpreted this as a willingness to work to help improve a dangerous intersection and future traffic flows for community businesses and residents. The Township has an ongoing public safety concern that the Town Board respectfully requests be addressed prior to the Site Permit and two Route Permits receiving PUC authorization to move forward.

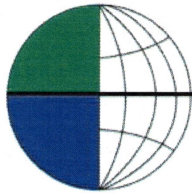
Exhibit A is a copy of a letter from our Engineer regarding the most significant dangerous situation that currently exists surrounding this intersection.

If the Commission has any questions, please do not hesitate to contact me at brian@beckertownship.org.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brian Kolbinger', with a stylized flourish at the end.

Brian Kolbinger
Becker Town Board, Chair



Bogart, Pederson & Associates, Inc.

CIVIL ENGINEERING
LAND SURVEYING
ENVIRONMENTAL SERVICES

EXHIBIT A

Traditional Values • Creative Solutions

April 30, 2021

Becker Township Board
Attn: Lucinda Messman, Clerk
12165 Hancock St
Becker, MN 55308

RE: Becker Township 149th St SE Extension

Salida Crossing is located in the South-West Quadrant of the intersection of TH 10 and CSAH 11. This area includes multiple commercial businesses that contribute a high quantity of local traffic as well as extremely high levels of seasonal agriculture traffic.

The regional traffic flow in the area travels north-bound on CSAH 11 and then north-west-bound on TH 10. According to a Traffic Level study conducted in 2017, this intersection generates a peak hourly traffic level of approximately 2,600 vph (vehicles per hour). The results from this study classifies this intersection as a LOS (Level of Service) E. LOS ranges from A-F and as the level progresses towards F the average speed and safety level typically decreases. According to a Crash Analysis Study conducted in 2011-2015, the average crash rate for this type of intersection is 0.46 and the actual crash rate is 1.24 including one fatality.

This area only has one access which is onto CSAH 11 and the queue from the CSAH 11/TH10 intersection often extends beyond the entrance into this area. There is also a major regional Railroad that crosses CSAH 11 which greatly extends the amount and time of north-bound traffic on CSAH 11 which often creates queue lengths over one mile. During harvesting season, the agriculture traffic which involves large commercial vehicles increases the ADT (Average Daily Traffic) accessing CSAH 11 significantly. All of these factors warrant the addition of a second access to this area in order to alleviate these safety concerns:

1. The ability for emergency vehicles to effectively respond to an incident in this area due to the long queues that extend beyond the only access to this area as well as the high usage of the regional railroad which exacerbates the queuing issue.
2. The safety of the regional and local traffic that is impacted by the large number of commercial and agricultural vehicles accessing CSAH 11, especially during harvesting season.

3. Addressing the increased amount of traffic in this area due to unexpected growth and development.

It is my opinion as a Professional Engineer that the route running north-west parallel to TH 10 or the route extending 164th Ave SE southward would be necessary to alleviate safety concerns with the high amount of traffic in this area conflicting with the high level of regional traffic and queues associated with the TH10/CSAH 11 Intersection.

Sincerely,



Wesley P. Davis, PE
Bogart, Pederson & Associates, Inc.