

Phone: 763.200.4239 Fax: 763.261.4411 www.ci.becker.mn.us Becker, MN 55308

12060 Sherburne Ave. P.O. Box 250

August 10, 2021



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







RE: In the Matter of Xcel Energy's Petition for Approval of the Acquisition of Solar Generation at the Sherburne County Generation Facility Site. PUC Docket No. E-002/M-20-891.



Dear Mr. Seuffert and Commissioners:



The City of Becker, Minnesota ("the City") 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"). In light of the new changes in Xcel Energy's ("Xcel" or "the Company") Integrated Resource Plan ("IRP"), and the limits that this Project will place on our community's future growth, as we have previously commented, we submit these comments for the Commission's consideration.



Pebble Creek Golf Club





The City is submitting comments today specifically in response to two of the Commission's request for comments in this docket: "Should the Commission approve Xcel Energy's request to build, own, and operate the proposed 460 MW solar project at the Sherco generation facility site?" and "Are there other issues or concerns related to this matter?" As the Commission is aware, the City does not object to the Company building, owning, or operating a solar project. The City's concerns are limited to the footprint of the project as proposed for the reasons stated in both of its previous comment letters. The City's concerns related to this matter are not presently being evaluated in the above-docketed matter but are currently under review in the related PUC dockets; Docket Nos. E-002/TL-21-189 (Route Permit for West 345 kV Transmission Line), E-002/TL-21-190 (Route Permit for East kV Transmission Line), and E-002/GS-21-191 (Site Permit). To avoid duplication, the City's previous comment letters are herein incorporated by reference.<sup>2</sup>

<sup>&</sup>lt;sup>1</sup> See "Reply Comments: 2020-2034 Upper Midwest Integrated Resource Plan, Docket No. E-002/RP-19-368," 1-2 (June 25, 2021) (noting that the new preferred plan does not call for a combined cycle natural gas plant in Becker, MN, and that this change will result in a loss of tax base for the City, and that this will be the first time since the 1970s that Xcel will not have a central power station in Becker); "Xcel Energy changes course, new plan does not include plant," Kirsti Marohn, Minnesota Public Radio News. Becker https://www.mprnews.org/story/2021/06/25/xcel-energy-changes-course-new-plan-does-not-include-becker-gasplant.

<sup>&</sup>lt;sup>2</sup> See, Comments, City of Becker RE: In the Matter of Xcel Energy's Petition for Approval of the Sherco Solar Project, PUC Docket NO. E-002/M-20-891 (April 30, 2021); Comments, City of Becker RE: In the Matter of the Application of Xcel Energy for a Site Permit and Two Route Permits for the up to 460 MW Sherco Solar Energy Generating

In addition, the City notes that the Company's most recent supplemental IRP (PUC Docket No. E-002/RP-19-368) eliminated the proposed combined cycle natural gas plant slated for operation within the City of Becker. This natural gas project would have allowed the City to recoup of some of the lost tax base it has and will continue to experience with the decommissioning of the Sherco coal-fired units.<sup>3</sup> The exclusion of this facility from the company's IRP heightens the City's concern, as previously expressed, that the location of the solar installations adjacent to municipal infrastructure in which the City and State have made significant investments will unnecessarily limit the opportunities for future economic expansion within the City.

If the Commission has any questions, please do not hesitate to contact me at <a href="mailto:gpruszinske@ci.becker.mn.us">gpruszinske@ci.becker.mn.us</a> or our legal representatives in this matter, Robert Scott at <a href="mailto:rtscott@flaherty-hood.com">rtscott@flaherty-hood.com</a> and Gretel Lee at <a href="mailto:glee@flaherty-hood.com">glee@flaherty-hood.com</a>.

Sincerely,

Greg Pruszinske

Sug 1,3L

City Administrator

City of Becker, Minnesota

System and Associated kV Transmission Lines in Sherburne county, Minnesota, PUC Docket Nos. E-002/TL-21-189 (Route Permit for West 345 kV Transmission Line), E-002/TL-21-190 (Route Permit for East kV Transmission Line), E-002/GS-21-191 (Site Permit) (May 18, 2021).

<sup>&</sup>lt;sup>3</sup> See, e.g., "Reply Comments: 2020-2034 Upper Midwest Integrated Resource Plan, Docket No. E-002/RP-19-368," 1-2 (June 25, 2021) (noting that the new preferred plan does not call for a combined cycle natural gas plant in Becker, MN, and that this change will result in a loss of tax base for the City).