



April 8, 2022

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

RE: Center for Energy and Environment's Reply Comments in the Matter of Xcel Energy's Petition  
for Approval of the Sherco Solar Project  
Docket Number E002/M-20-891

Dear Mr. Seuffert,

Center for Energy and Environment ("CEE") respectfully submits these Reply Comments to the Minnesota Public Utilities Commission ("Commission") in the Matter of Xcel Energy's Petition for the Sherco Solar Project in this docket.

CEE supports Xcel Energy's proposal to invest in a new solar development at the site of the Sherburne County Generation Station ("Sherco solar project"). We believe that the Sherco solar project proposal will result in an array of important benefits, including helping to support the Becker community and plant workers through the retirement of the Sherburne County Generation Station ("Sherco plant"); creating local, high-quality jobs; improving workforce diversity in the utility sector; and further reducing greenhouse gas and other pollutant emissions of Xcel Energy's system.

#### Background

In advance of Xcel Energy's most recent integrated resource plan,<sup>1</sup> CEE led an assessment of the social and economic impacts of five Minnesota power plants across six communities that host them. That work included the Sherco power plant and the surrounding community.

The overall assessment, which concluded in early 2020, consisted of two separate studies. First, the assessment included economic scenario modeling, which was conducted by the Leeds School

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<sup>1</sup> Docket Number E-002/RP-19-368

of Business at the University of Colorado Boulder.<sup>2</sup> That study focused on the direct and indirect dollar impacts of different plant retirement dates for each of the five power plants studied.

The second study, titled *Minnesota's Power Plant Communities: An Uncertain Future*, was conducted by CEE and relied on a mix of qualitative and quantitative data to provide an in-depth analysis of what power plants mean to the communities that host them and the workers who make a living working in and on the plants, as well as how those communities and workers are thinking about and planning for the eventual retirement of the plants they host and in which they work.<sup>3</sup>

Throughout the two studies, CEE worked closely with the City of Becker and conducted in-depth interviews with City representatives and other key stakeholders in the surrounding community, including representatives from Becker Township, Sherburne County, the local school districts, and Liberty Paper, and a local pastor. Additionally, Sherco plant workers and several community members participated in a survey for the study. Finally, CEE interviewed representatives from the International Brotherhood of Electrical Workers (IBEW), Laborers' International Union of North America (LIUNA), and the International Brotherhood of Boilermakers, all labor unions that represent many of the men and women who work in and on the Sherco plant.

More recently, CEE served alongside the City of Becker on the advisory committee to the Midwestern Governors Association initiative on Preparing Midwestern Communities for Power Plant Closures, led by Minnesota Governor Tim Walz. The final recommendations of that initiative include guidance for policy-makers, best practices for communities, and federal level recommendations.<sup>4</sup>

This work provides CEE with an understanding of the challenges and opportunities the Becker community and Sherco workers face regarding the eventual retirement of the Sherco plant. With this knowledge, we submit the following comments for Commission consideration.

#### City of Becker's Concerns on Project Footprint

Through this docket and others,<sup>5</sup> the City of Becker raised concerns about the physical footprint of the proposed Sherco solar project and requested that Xcel Energy modify the proposed project

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<sup>2</sup> [https://www.mncee.org/sites/default/files/2022-04/Xcel-Energy-MN-Economic-Impact-Analysis-Final-Report-042820\\_2.pdf](https://www.mncee.org/sites/default/files/2022-04/Xcel-Energy-MN-Economic-Impact-Analysis-Final-Report-042820_2.pdf)

<sup>3</sup> <https://www.mncee.org/minnesotas-power-plant-communities-uncertain-future>

<sup>4</sup> <https://secureservercdn.net/166.62.108.196/8jk.4e3.myftpupload.com/wp-content/uploads/ChairsAgenda/2020-Walz/PowerPlantClosures/DraftFinalRecommendationsDocument.pdf>

<sup>5</sup> 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 exclude certain parcels of land to enable additional economic development opportunities on those parcels. CEE supports the City of Becker's request.

It is our understanding that Xcel Energy and the City of Becker worked together and that, on April 5, 2022, the Becker City Council approved an agreement with Xcel Energy on this matter that alleviates the City's concerns. We expect this agreement will be or has been filed to this docket. CEE supports the proposed Sherco solar project as modified to address the concerns of the City of Becker. For these Comments, the "Sherco solar project" refers to the modified proposal, supported by the City of Becker.

Going forward, CEE believes it will be important that Xcel Energy coordinate with the City of Becker on any future energy investments at or near the Sherco site to ensure that those energy investments support, and do not limit, other planned economic development efforts.

### Supporting the Becker Community

The Sherco plant is a major employer and a significant source of tax revenue for the Becker community. The Sherco plant employs approximately 300 plant employees. Property taxes from the Sherco plant make up approximately 77 percent of Becker's city tax base, 14 percent of Sherburne County's tax base, and 54 percent of the Becker School District's tax base.<sup>6</sup> The planned closure of the Sherco plant will result in a significant economic loss for the City of Becker and the surrounding community.

The City of Becker and surrounding communities have long been planning and preparing for the retirement of the Sherco plant and are pursuing a range of strategies to grow and maintain tax base and high-quality, local jobs. One key strategy is for the Becker community<sup>7</sup> to continue its role as a power provider. This strategy has evolved over several years as economics have shifted in favor of renewable energy resources. Nonetheless, this strategy remains critical to the Becker community's transition.

Xcel Energy estimates that the Sherco solar project will create approximately \$240 million in economic benefits, including approximately \$172 million in landowner payments, \$32 million in state and local taxes, and \$36 million in production taxes. These economic benefits of the proposed solar development will not fully replace the economic contributions of the Sherco plant. This is particularly true for the City of Becker, as the proposed solar project will be located outside of the City of Becker on land in adjacent townships. While the proposed solar project may

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<sup>6</sup> Based on 2018 data included in *Minnesota's Power Plant Communities: An Uncertain Future*. Page 10 [<https://www.mncee.org/minnesotas-power-plant-communities-uncertain-future>]

<sup>7</sup> For these comments, CEE defines the "Becker community" broadly to include the City of Becker, nearby municipalities, and Sherburne County.

provide indirect benefits, the City of Becker will need significant, additional economic development opportunities to support its transition.

Nonetheless, the Sherco solar project is an important part of a broad and comprehensive set of strategies to enable the broader Becker community to remain strong and vibrant through the Sherco plant retirement and beyond. The Sherco solar project will ensure continued tax revenue from Xcel Energy, high-quality, local construction jobs, a strong local energy industry, and a continued relationship with Xcel Energy, an important, long-standing corporate partner to the Becker community.

### Supporting Workers

Xcel Energy estimates that the Sherco solar project will create more than 900 local construction jobs and \$115 million in wages over a three-year period. These jobs offer two distinct and important opportunities.

First, the new jobs associated with the Sherco solar project offer an opportunity for interested, current Sherco plant workers to get training and experience in solar project development. As utilities retire thermal power plants, like the Sherco plant, utility workers may wish to transition to other energy careers, like solar installation and development positions. While not all existing plant workers may choose to make this transition, it is an important opportunity that Xcel Energy can and should provide to workers interested in staying in the energy sector. Importantly, the Sherco solar project will allow Sherco plant workers to get valuable training and experience right in their local community.

Second, the Sherco solar project provides a unique opportunity to use the project site for recruiting new workers and providing on-the-job-training to expand and diversify the utility workforce. Xcel Energy recently received Commission approval for the Workforce Training and Development pilot program, a program developed in partnership with the Minnesota Department of Employment and Economic Development and Labor organizations. The Workforce Training and Development pilot program will engage with traditionally under-represented people in the utility workforce – namely women and people of color – to provide opportunities for hands-on training and experience in utility construction jobs. The Workforce Training and Development program will prepare participants with key skills and provide direct connections to established apprenticeship programs.

The Sherco solar project – located only 45 miles from the Twin Cities and 20 miles from St. Cloud – is an ideal location for the training site and will enable participants from the Twin Cities and St. Cloud to participate in training without relocating or enduring excessive commutes. Xcel Energy plans to use the Sherco solar project as its first training site for the Workforce Training and Development pilot program, with more than 50 trainee participants planned for 2022. Program

participants who choose to pursue a registered apprenticeship can do so through construction of the Sherco solar development.

### Reusing Existing Assets

The Sherco solar project will re-use the Sherco power plant's Midcontinent Independent System Operator ("MISO") interconnection rights, which are held by Xcel Energy. Interconnecting new energy resources to the MISO system can be a time-consuming and expensive process. Xcel Energy estimates that not re-using the interconnection rights of Sherco Unit Two could come at a cost of hundreds of millions of dollars, based on recent interconnection costs in the MISO interconnection process.

CEE believes it is important that, when possible, utilities re-purpose existing, valuable utility assets, such as Xcel Energy's interconnection rights at the Sherco site, to support investments in new utility resources. Based on Xcel Energy's most recently approved integrated resource plan, we expect the company will continue to add solar resources to the system. As Xcel Energy adds those resources, it is unlikely that the company will encounter many additional opportunities to re-use existing interconnection rights. We believe the company should capitalize on the rare opportunity to use its existing interconnection rights at the Sherco site.

We recognize that using Xcel Energy's existing interconnection rights restricts the ownership of the project. As noted, we expect that the company will continue to invest in additional, large-scale renewable energy resources. Those additional investments will be open to a variety of ownership arrangements. We are supportive of Xcel Energy owning the Sherco solar project and using its valuable interconnection rights at the Sherco plant site.

### Conclusion

Xcel Energy's proposed Sherco solar project is a unique opportunity to support the Becker community and plant worker transition through the retirement of the Sherco plant, expand and diversify the utility workforce, and repurpose valuable utility assets for new energy resources, all while reducing the greenhouse gas emissions and other pollution associated with Xcel Energy's system.

The proposed Sherco solar project draws on many of the best practices and recommendations from CEE's Minnesota Host Community Study,<sup>8</sup> the Midwestern Governors Association's work on power plant communities under the leadership of Minnesota Governor Tim Walz,<sup>9</sup> and the

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<sup>8</sup> <https://www.mncee.org/power-plant-transition-host-communities>

<sup>9</sup> <https://secureservercdn.net/166.62.108.196/8jk.4e3.myftpupload.com/wp-content/uploads/ChairsAgenda/2020-Walz/PowerPlantClosures/DraftFinalRecommendationsDocument.pdf>

Energy Utility Diversity Stakeholder group report.<sup>10</sup> Additionally, the project responds to the Commission's interest in workforce and community impacts of the utility system as established in the Xcel Energy Performance Metrics docket<sup>11</sup> and other dockets.

CEE recommends the Commission approve Xcel Energy's proposed Sherco solar project as modified to address the City of Becker's concerns.

We appreciate the Commission's consideration of our comments. Please contact me at [apartridge@mncee.org](mailto:apartridge@mncee.org) with any questions.

Sincerely,

/s/ Audrey Partridge  
Director of Regulatory Policy  
Center for Energy and Environment

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<sup>10</sup> <https://www.leg.mn.gov/docs/2020/mandated/200077.pdf>

<sup>11</sup> Docket Number E-002/CI-17-401

## **AFFIDAVIT OF SERVICE**

### **DOCKET NUMBERS E002/M-20-891**

I, Audrey Partridge, hereby certify that on this 8<sup>th</sup> day of April 2022, I served Center for Energy and Environment's *Reply Comments in the Matter of Xcel Energy's Petition for Approval of the Sherco Solar Project* in Docket No. E002/M-20-891 on the following persons on the attached Service Lists by:

XX placing such filing in envelopes, properly addressed, and depositing the same in the Post Office at the City of Minneapolis, for delivery by the United States Post Office as directed by said envelopes.

XX electronic filing

/s/ Audrey Partridge

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[illegible]



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