

April 20, 2021

VIA ELECTRONIC FILING

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

Re: **In the Matter of the Application of Xcel Energy for a Route Permit for the West 345 kV transmission line for the Sherco Solar Project in Sherburne County.**
Docket No. E-002/TL-21-189

In the Matter of the Application of Xcel Energy for a Route Permit for the East 345 kV transmission line for the Sherco Solar Project in Sherburne County.
Docket No. E-002/TL-21-190

In the Matter of the Application of Xcel Energy for a Site Permit for the up to 460 MW Sherco Solar Project in Sherburne County.
Docket No. E-002/GS-21-191

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy (“Xcel Energy” or the “Applicant”) is proposing to construct an up to 460-megawatt (“MW”) solar project (“Solar Project”) and two 345 kilovolt (“kV”) transmission lines to interconnect the Solar Project to the grid (collectively the “Project”). As proposed, the West high voltage transmission line (“HVTL”) is approximately 3.2 miles long (“West HVTL Project”) and the East HVTL line is approximately 1.7 miles long (“East HVTL Project”); both HVTL lines connect the Solar Project to the existing Sherburne County Substation immediately south of the Xcel Energy Sherburne County Generating Facility. The Solar Project will partially replace energy production of the Sherco Generating Plant Unit 2, currently a coal-powered facility, which will cease operations in 2023.

Xcel Energy respectfully submits this Permit Application (“Application”) to the Commission for a Site Permit and two Route Permits. Pursuant to Minn. R. 7850.1600, Xcel Energy has elected to apply for both a site permit and the two route permits for the West and East HVTL lines needed to interconnect the Solar Project in one application and as part of one proceeding before the Commission.

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The Project represents a joint development between Xcel Energy and National Grid Renewables Development, LLC (“NG Renewables”). The companies entered into a Purchase and Sale Agreement (“PSA”) on January 14, 2021 whereby NG Renewables will act as an authorized representative on behalf of Xcel Energy. On April 12, 2021, Xcel Energy submitted a petition with the Commission to: 1) initiate the process of seeking Commission approval of the Purchase and Sale Agreement with NG Renewables; 2) request Commission approval of Xcel’s self-bid proposal selected pursuant to a Commission approved modified track 2 competitive bid process; 3) set forth the reasons that the Project is exempt from the Certificate of Need requirement (see Docket 20-891). This Application also sets forth the reasons why a Certificate of Need is not required pursuant to Minn. R. 7850.1900, subp. 1, L.

Pursuing permitting for the Project while the petition for the approval of the Company’s selection of the project is consistent with past practice. For example, Invenergy applied for a site permit for the Freeborn Wind Farm (in Docket No. IP-6946/WS-17-410) prior the Commission’s approval of Xcel Energy’s selection of the Freeborn wind project (in Docket No. E002/M-16-777), noting in its June 14, 2017 Application that the project was exempt from certificate of need requirements.

Enclosed for filing in the dockets identified herein, please find:

1. Application of Xcel Energy for a Site Permit and Two Route Permits for the Sherco Solar Project in Sherburne (MPUC Docket Nos. E-002/TL-21-189/TL-21-190/GS-21-191), including:
 - i. Figures;
 - ii. Public Appendices A – K; and
 - iii. Nonpublic Appendices B and J. In accordance with Minnesota Rules, part 7829.0500, and Minn. Stat. Ch. 13, the Applicant has designated as **NONPUBLIC** certain commercially sensitive trade secret information related to the cost of the Project included in the **NONPUBLIC** version of Appendix B, which, if released, would have a detrimental effect on the Applicant by providing potential competitors, commercial parties and others with valuable information not otherwise readily ascertainable and from which these persons would obtain economic value. The Applicant has also designated as **NONPUBLIC** in accordance with Minnesota Rules, part 7829.0500, and Minn. Stat. Ch. 13, Appendix J because it contains sensitive cultural and environmental information.

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2. Certificate of Service.

The documents referenced above have also been e-filed today through www.edockets.state.mn.us. Application filing fees were previously sent under separate cover. Copies of the Application are also being provided to the Department of Commerce, Energy Environmental Review and Analysis for distribution to the Commission.

A copy of this filing is also being served upon the persons on the Official Service Lists of record and the general service lists, as applicable. Please let me know if you have any questions regarding this filing.

Sincerely,

FREDRIKSON & BYRON, P.A.
ATTORNEYS FOR NG RENEWABLES

/s/ Jeremy P. Duehr

Jeremy P. Duehr
Direct Dial: 612.492.7413
Email: jduehr@fredlaw.com

/s/ Haley L. Waller Pitts

Haley L. Waller Pitts
Direct Dial: 612.492.7443
Email: hwallerpitts@fredlaw.com

JPD:blj:72582232 v2
Enclosures

Certificate of Service

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Route Permit for the West 345 kV transmission line
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Project in Sherburne County.
Docket No. E-002/GS-21-191**

Breann L. Jurek certifies that on the 20th day of April 2021, she e-filed on behalf of Northern States Power Company, doing business as Xcel Energy true and correct copies of the following documents:

1. Application of Xcel Energy for a Site Permit and Two Route Permits for the Sherco Solar Project in Sherburne (MPUC Docket Nos. E-002/TL-21-189/TL-21-190/GS-21-191), including:
 - i. Figures;
 - ii. Public Appendices A – K; and
 - iii. Nonpublic Appendices B and J. In accordance with Minnesota Rules, part 7829.0500, and Minn. Stat. Ch. 13, the Applicant has designated as **NONPUBLIC** certain commercially sensitive trade secret information related to the cost of the Project included in the **NONPUBLIC** version of Appendix B, which, if released, would have a detrimental effect on the Applicant by providing potential competitors, commercial parties and others with valuable information not otherwise readily ascertainable and from which these persons would obtain economic value. The Applicant has also designated as **NONPUBLIC** in accordance with Minnesota Rules, part 7829.0500, and Minn. Stat. Ch. 13, Appendix J because it contains sensitive cultural and environmental information.
2. Certificate of Service.

A copy has also been served on the individuals listed on the attached service lists.

Executed on: April 20, 2021

Signed: /s/ Breann L. Jurek
Fredrikson & Byron, P.A.
200 South Sixth Street
Suite 4000
Minneapolis, MN 55401

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Aaron	Brixius	Aaron.P.Brixius@xcelenergy.com	Xcel Energy	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-189_TL-21-189
Jordan	Burmeister	jordan@nationalgridrenewables.com	National Grid Renewables Development, LLC	8400 Normandale Boulevard Suite 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_21-189_TL-21-189
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-189_TL-21-189
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-189_TL-21-189
Jeremy	Duehr	jduehr@fredlaw.com	Fredrikson & Byron, P.A.	200 South Sixth Street Suite 4000 Minneapolis, Minnesota 55402-1125	Electronic Service	No	OFF_SL_21-189_TL-21-189
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_21-189_TL-21-189
Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY	401 Nicollet Mall FL 8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-189_TL-21-189
Ellen	Heine	ellen.l.heine@xcelenergy.com	Xcel Energy	414 Nicollet Mall, MP-8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-189_TL-21-189
Breann	Jurek	bjurek@fredlaw.com	Fredrikson & Byron PA	200 South Sixth St Ste 400 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-189_TL-21-189
Ryan	Long	ryan.j.long@xcelenergy.com	Xcel Energy	414 Nicollet Mall 401 8th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-189_TL-21-189

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-189_TL-21-189
William	Risse	wrisse@nationalgridrenewables.com	National Grid Renewables Development, LLC	8400 Normandale Blvd Ste 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_21-189_TL-21-189
Melissa	Schmit	melissa@nationalgridrenewables.com	National Grid Renewables	8400 Normandale Lake Blvd Ste 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_21-189_TL-21-189
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-189_TL-21-189
William	Storm	bill.storm@state.mn.us	Department of Commerce	Room 500 85 7th Place East St. Paul, MN 551012198	Electronic Service	No	OFF_SL_21-189_TL-21-189
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	Yes	OFF_SL_21-189_TL-21-189
Haley	Waller Pitts	hwallerpitts@fredlaw.com	Fredrikson & Byron, P.A.	200 S 6th St Ste 4000 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-189_TL-21-189

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Aaron	Brixius	Aaron.P.Brixius@xcelenergy.com	Xcel Energy	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-190_TL-21-190
Jordan	Burmeister	jordan@nationalgridrenewables.com	National Grid Renewables Development, LLC	8400 Normandale Boulevard Suite 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_21-190_TL-21-190
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-190_TL-21-190
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Ellen	Heine	ellen.l.heine@xcelenergy.com	Xcel Energy	414 Nicollet Mall, MP-8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-190_TL-21-190
Breann	Jurek	bjurek@fredlaw.com	Fredrikson & Byron PA	200 South Sixth St Ste 400 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-190_TL-21-190
Ryan	Long	ryan.j.long@xcelenergy.com	Xcel Energy	414 Nicollet Mall 401 8th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-190_TL-21-190

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William	Risse	wrisse@nationalgridrenewables.com	National Grid Renewables Development, LLC	8400 Normandale Blvd Ste 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_21-190_TL-21-190
Melissa	Schmit	melissa@nationalgridrenewables.com	National Grid Renewables	8400 Normandale Lake Blvd Ste 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_21-190_TL-21-190
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-190_TL-21-190
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	Yes	OFF_SL_21-190_TL-21-190
Haley	Waller Pitts	hwallerpitts@fredlaw.com	Fredrikson & Byron, P.A.	200 S 6th St Ste 4000 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-190_TL-21-190

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William	Storm	bill.storm@state.mn.us	Department of Commerce	Room 500 85 7th Place East St. Paul, MN 551012198	Electronic Service	No	OFF_SL_21-191_GS-21-191
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	Yes	OFF_SL_21-191_GS-21-191
Haley	Waller Pitts	hwallerpitts@fredlaw.com	Fredrikson & Byron, P.A.	200 S 6th St Ste 4000 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-191_GS-21-191

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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John E.	Drawz	jdrawz@fredlaw.com	Fredrikson & Byron, P.A.	Suite 4000 200 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	SPL_SL__PPSA General List
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Larry	Hartman	Larry.Hartman@state.mn.us	Department of Commerce	85 7th Place East, Suite 280 St. Paul, MN 55101	Electronic Service	No	SPL_SL__PPSA General List
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Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S. Eighth Street Minneapolis, MN 55402	Electronic Service	No	SPL_SL__PPSA General List

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STACY	KOTCH EGSTAD	Stacy.Kotch@state.mn.us	MINNESOTA DEPARTMENT OF TRANSPORTATION	395 John Ireland Blvd. St. Paul, MN 55155	Electronic Service	No	SPL_SL__PPSA General List
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Bruce	King	bruce@ranww.org	Realtors, Association of Northwestern WI	Suite 3 1903 Keith Street Eau Claire, WI 54701	Electronic Service	No	SPL_SL__PPSA General List
Chris	Kopel	chrisk@CMPASgroup.org	Central Minnesota Municipal Power Agency	459 S Grove St Blue Earth, MN 56013-2629	Electronic Service	No	SPL_SL__PPSA General List
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Colleen	Mueller	N/A		22186 State Hwy 4 Paynesville, MN 56362	Paper Service	No	SPL_SL__PPSA General List

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Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	SPL_SL__PPSA General List
Kevin	Peterson	kjp@ibew160.org	IBEW Local 160	1109 Northway Lane NE Rochester, MN 55906	Electronic Service	No	SPL_SL__PPSA General List
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Larry	Rebman	larryemls@hotmail.com	EMLS, Inc	PO Box 122 Appleton, MN 56208	Electronic Service	No	SPL_SL__PPSA General List
Margaret	Rheude	Margaret_Rheude@fws.gov	U.S. Fish and Wildlife Service	Twin Cities Ecological Services Field Office 4101 American Blvd. E. Bloomington, MN 55425	Electronic Service	No	SPL_SL__PPSA General List
Rod	Schumacher	rod.schumacher@is-grp.com	I&S Group	115 E Hickry St Suite 300 Mankato, MN 56001	Paper Service	No	SPL_SL__PPSA General List
Tom	Slukich	tom@nationalconductor.com	National Conductor Constructors	18119 Hwy 371 North Brainerd, MN 56401	Electronic Service	No	SPL_SL__PPSA General List
Adam	Sokolski	adam.sokolski@edf-re.com	EDF Renewable Energy	10 Second Street NE Ste 400 Minneapolis, MN 55410	Electronic Service	No	SPL_SL__PPSA General List
Mark	Strohfus	mstrohfus@greenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	SPL_SL__PPSA General List

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Carl	Strohm	cjsmg@sbcglobal.net	SBC Global	105 East Edgewood Ave Indianapolis, IN 46227	Electronic Service	No	SPL_SL__PPSA General List
Tom	Swafford	tswafford@umsi.us	Utility Mapping Services, Inc	3947 E Calvary Rd Suite 103 Duluth, MN 55803	Electronic Service	No	SPL_SL__PPSA General List
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	SPL_SL__PPSA General List
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	SPL_SL__PPSA General List
Todd	Tadych	ttadych@atcllc.com	American Transmission Company LLC	5303 Fen Oak Dr Madison, WI 53718	Electronic Service	No	SPL_SL__PPSA General List
Caren	Warner	caren.warner@state.mn.us	Department of Commerce	85 7th Place East Suite 280 St. Paul, MN 55101-2198	Electronic Service	No	SPL_SL__PPSA General List
Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources	500 Lafayette Road Box 25 St. Paul, Minnesota 55155-4040	Electronic Service	No	SPL_SL__PPSA General List
Elizabeth	Wefel	eawefel@flaherty-hood.com	Flaherty & Hood, P.A.	525 Park St Ste 470 Saint Paul, MN 55103	Electronic Service	No	SPL_SL__PPSA General List
Deanna	White	dwhite@cleanwater.org	Clean Water Action & Water Fund of MN	330 S 2nd Ave Ste 420 Minneapolis, MN 55401	Electronic Service	No	SPL_SL__PPSA General List