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September 15, 2021



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



VIA ONLINE SUBMISSION ONLY



RE: Request for a Citizen Advisory Task Force for Environmental Assessment 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 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 345 kV Transmission Line) E-002/GS-21-191 (Site Permit)





Dear Mr. Seuffert and Commissioners:



The City of Becker, Minnesota (the "City" or "Becker") submits the following request to the Minnesota Public Utilities Commission ("PUC" or "Commission") to convene an advisory task force to assist the Minnesota Department of Commerce Energy Environmental Review & Analysis division ("DOC" or "Department") in scoping and proceeding with the Environmental Assessment pursuant to Minn. Stat. § 216E.08, Minn. R. 7850.2400 and Minn. R. 7850.3600.



Pursuant to state law, an advisory task force may be appointed by the Commission to aid in carrying out the Commission's duties. Furthermore, a person (defined to include a municipal corporation) may request an advisory task force if the Commission does not order one. Based on the development of the record in the above-referenced dockets to date, the concerns raised by the City in its comments filed therein, and the outstanding disagreement between the involved parties on this matter, the City believes that an advisory task force has become necessary in these dockets. An advisory task force would aid the Commission by evaluating the proposed and potential alternative sites for the Sherco Solar Project, as well as the project's negative economic impacts not evaluated in Xcel's Permit Application and potential mitigation thereof. An advisory task force would also to ensure that a robust record is developed, and that adequate alternatives (especially for a project of this size and scope) are effectively evaluated.

¹ Minn. Stat.§ 216E.08.

² Minn. R. 7850.2400, subp. 2; Minn. R. 7850.1000, subp. 13.

³ See, e.g. Application for a Site Permit and Two Route Permits for the Sherco Solar Project, Northern States Power Co. d/b/a Xcel Energy, Inc., Sherburne County, Minnesota, PUC Docket Nos. E-002/GS-21-191, E-002/TL-21-190, E-002/TL-21-189, 14, 93-94, 114-115 (Apr. 2021).

The City requests that the Commission charge the advisory task force requested herein with identifying and evaluating the potential negative economic impacts that the Sherco Solar project will have on Becker's economy, including but not limited to the negative impacts on its tax base and potential to grow the same through future economic development and how the footprint of the Sherco Solar Project could be adjusted to minimize and/or mitigate these negative impacts.⁴

The City further requests that the advisory task force requested herein be charged with identifying possible alternative sites to be included within the Sherco Solar Project in place of the following parcels:

East Site:

- Parcel I.D. No. 05-005-2400
- Parcel I.D. No. 05-005-3000

West Site:

- Parcel I.D. No. 20-134-1100
- Parcel I.D. No. 20-134-1400
- Parcel I.D. No. 20-134-4100

The City's objections to the inclusion of these parcels within the Sherco Solar project are more fully articulated in the City's comment letter to the Department of Commerce regarding the scope of the Environmental Assessment submitted on today's date, which comments are incorporated herein by reference in support of the City's request for an advisory task force.

Finally, the City requests that representatives from the City be included on such task force consistent with Minn. Stat. § 216E.08.

Please do not hesitate to contact me at gpruszinske@ci.becker.mn.us or our legal representatives in this matter, Robert Scott and Gretel Lee, at rtscott@flaherty-hood.com and gllee@flaherty-hood.com respectively. We thank you for your consideration of this request.

Sincerely,

Greg Pruszinske

City Administrator

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City of Becker, Minnesota

⁴ See Minn. R. 7850.3700.