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September 15, 2021

William Storm, Environmental Review Manager
Minnesota Department of Commerce
85 7th Place East, Suite 280
St. Paul MN 55101

RE: In the Matter of the Application of Xcel Energy for a Site Permit and Two Route Permits for the up to 460 Megawatt Sherco Solar Energy Generating System and Associated 345 Kilovolt Transmission Lines in Sherburne County, Minnesota
PUC Docket Numbers: E-002/GS-21-191 (Site Permit), E-002/TL-21-190 (Route Permit for East 345 kV Transmission Line), E-002/TL-21-189 (Route Permit for West 345 kV Transmission Line)

Dear Mr. Storm,

On August 11th, 2021, the Minnesota Public Utilities Commission (PUC) and the Minnesota Department of Commerce (DOC) issued a Notice of Public Information and Environmental Assessment Scoping Meetings on the Application of Xcel Energy (Applicant) for a Site Permit and Two Route Permits for the up to 460 Megawatt Sherco Solar Energy Generating System and Associated 345 Kilovolt Transmission Lines in Sherburne County. The Minnesota Department of Transportation (MnDOT) has reviewed the application regarding the proposed project and submits the following comments in response to the Notice.

MnDOT's original correspondence comments in Appendix C of the Application still hold true and will not be reiterated here with one exception:

MnDOT views solar generating projects as it would any other private commercial venture and does not consider a solar generating project to be a public utility for transportation purposes. Any MnDOT land that Hayward Solar may wish to occupy would need to be leased (in the areas where a lease is feasible). In addition, any associated electrical collection systems that run *along* a trunk highway right of way would need to be permitted through a municipal, cooperative, or investor-owned electric service provider. MnDOT allows private parties to place connecting lines across trunk highway rights of way but does not allow private parties to place such facilities longitudinally along trunk highways.

As stated in Table 7.0-1 of the Application, use of MnDOT Utility Permit on Trunk Highway Right-of-Way and Driveway Access permits are not applicable to this project. The Applicant may, however, need to apply for Oversize/Overweight permits and may do so here: [Minnesota Oversize/Overweight Permits - MnDOT \(state.mn.us\)](https://www.mn.gov/transportation/oversize-overweight-permits)

Because MnDOT's highway construction activities could impact project construction and plans to haul oversize loads to the proposed site, Sherco Solar will need to coordinate with MnDOT when planning such loads. These projects can change and therefore, the applicant should regularly check the MnDOT website at [MnDOT District 3 Projects](https://www.mn.gov/transportation/district-3-projects) to remain up to date on the latest project information.

MnDOT's Comments on Xcel Energy's September 7th Filing [Xcel Energy Informational Letter 9-7-21](#):

Approximately 15 years ago, MnDOT developed a sketch for an interchange at the US 10/Sherburne CSAH 11 intersection, in addition to a US 10 bypass of Big Lake. Due to changes in MnDOT's investment philosophy, neither project progressed beyond the preliminary layout stage.

More recently, several attempts have been made by local governments (Becker, Big Lake, Monticello, Becker Township, Big Lake Township, Monticello Township, Wright County and Sherburne County) to create a plan for an additional bridge crossing of the Mississippi River. The study identified as attachment 2 in the September 7, 2021 letter from Xcel Energy was prepared to evaluate current and future traffic needs and identify improvements that could accommodate future growth in the area. As the memo states in the third paragraph on page 1, "Through the study process, it was determined that more thorough evaluation of the land use and future development plans of the partners is needed before infrastructure recommendations can be made. Therefore the scope of this study was modified to not include recommendations."

The TH 25 Area Study evaluated traffic volumes, traffic patterns, and safety concerns as a planning level document initiated by the local governments. Currently, MnDOT District 3 is not pursuing any major improvements in the study area. No action has been taken by MnDOT to identify funding for any of the options identified in the TH 25 Area Study. While MnDOT is not currently pursuing an interchange at US 10 and CSAH 11, major changes in land use or safety concerns could prompt discussions to change that decision.

Should the PUC issue a Site Permit for the Sherco Solar Project, early coordination with MnDOT staff is strongly encouraged. Any MnDOT permits applied for as a part of these projects will not be issued until the PUC has issued an approved site permit for this project. All applicable permitting, traffic control and construction coordination efforts should be made through Mark Renn, MnDOT District 3B Roadway Regulations Supervisor at Mark.Renn@state.mn.us or work 320-223-6522/cell 320-293- 8513/toll free 1-800-657-3961. MnDOT District Specialists should be given the opportunity to participate in pre-construction meetings as they apply to MnDOT owned property.

MnDOT has a continuing interest in working with the PUC, DOC EERA and the Applicant to ensure that possible impacts to the state transportation system are adequately addressed. MnDOT appreciates the opportunity to participate in the development of the scope of the environmental assessment.

Sincerely,

Stacy Kotch Egstad

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cc: Mark Renn – District 3B Permits

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