From: O. R. Armstrong
To: Storm, Bill (COMM)
Subject: Comment on Enivronmental Assessment of Xcel solar plant in Becker
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Comment regarding Docket Number: E-002/GS-21-191, TL-21-190, and TL-21-189
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I have concerns regarding three matters:

1. The route permit for the East and West 345 kV transmission lines

2. The location of the sites

3. Incomplete consideration of factors in the environmental assessment scoping process

The route permit for the East and West 345 kV transmission lines

The March 22, 2021, application for site and route permits filed by National Grid Renewables states that "the high voltage transmission lines are individually and collectively less than five miles long," therefore making them eligible for the alternative permitting process. Slide 3 of the public presentation made in Becker on August 31 stated that the east and west transmission lines were 1.7 miles and 3.2 miles in length, respectively.

Refer to the document titled "Overall Site Plan - Area A" Sheet C.200 dated 3/9/2021. The revisions section on that document indicates that the location of the substation was changed three times in February and March, 2021. The route of the Proposed Overhead Transmission line on the aerial photo by an orange dashed line does not agree with the route of that transmission line through the same area as is shown in the "Key Map" on that document.

Although I lack access to a sufficiently-detailed map, it is quite apparent from document C.200 that the route of the transmission line shown in the Key Map is significantly longer than that shown in the aerial photo. An accurate measurement of the two routes might reveal that the difference is greater than one-tenth of a mile. If so, the combined routes of the transmission lines might exceed 5.0 miles, and those two projects would not be eligible for the Alternate Permitting process.

While this might be little more than a "clerical" error, I am concerned whether other documents related to the project still show the longer route.

The location of the sites

Although the issue has previously been discussed, I remain concerned that the locations of the East and West solar sites effectively limit the Becker industrial park to its present size. I raised that objection in the public meeting held by the Department on August 31, and I believe that the Town of Becker has also raised that objection. The industrdial park was created in order to provide new employment opportunites for area residents, hopefully to minimize the loss of 300 jobs that will result from shutting down the coal plant. While

there might have been a slight reduction in that job loss becuase Xcel had previously commited to build a new natural gas plant in or near the industrial park, which would employ 50 area residents, Xcel has reneged on that commitment.

It occurs to me that the location of the sites might have been influenced by the length of the transmission lines and the location of the substations within those sites. Specifically with respect to the West site, was the previous location of the substation within that site (close to its northwestern boundary) calculated to enable Xcel to expand the solar site in the future and connect to a substation without building another high-voltage line? If that was the case, then it would be economically advantageous for Xcel to keep the West site at its present planned size and location, and to deny requests from the Becker community to allow some room for expansion of our industrial park.

Further, the recent revisions to document C.200 appear to reduce the length of the route of the overhead transmission line to the substation in West site. The new location of the substation might now mean that if Excel plans to expand the West site, it would have to build a new substation and either extend the existing transmission line or build a new one. If that is the case, then Xcel has less reason to deny the requests of the Becker community to allow room for some expansion of its industrial park.

Incomplete consideration of factors in the environmental assessment scoping process

The driving force for the elimination of fossil fuels is the theory that anthropogenic carbon dioxide is causing a rise in the temperature of the atmosphere. Over the last 25 years, this “catastrophic global warming” scare has been based on computer simulations which invariably predicted a horrendous climate in the near future, but when that future got here, it never matched the scientific predictions.

While politicians say “follow the science,” few of them seem to know very much about science. Nonetheless, because it continues to draw votes and campaign donations, politicians will continue to enact policies which “follow the science.”

The latest scientific proposal emanates from the University of Washington, the Palo Alto Research Center and the Pacific Northwest National Library. Their researchers noted that clouds emitted from ocean-going ships were brighter than ordinary clouds. Being brighter, those clouds reflected more sunlight, which caused less sunlight to reach the earth, resulting in cooler atmospheric temperatures in the vicinity. These institutions are conducting further resarch to determine the feasibility of brigtening clouds all over the earth, to reduce the temperature of the atmosphere.

Less sunlight reaching the earth would, of course, reduce the amount of electricity that would be generated by solar panels. But at the same time, since it would result in lower atmospheric temperatures, less electricity would be needed to run our air conditioners. A win-win situation.

It would be easy to discount such a far-fetched concept, but consider how many far-fetched concepts have become reality over the past 35 years. And 35 years is the estimated lifetime of solar panels.