



May 18, 2021

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

**VIA ONLINE SUBMISSION ONLY**

**RE: In the Matter of Xcel Energy's Petition for Approval of the Sherco Solar Project  
PUC Docket Nos. E-002/TL-21-189; E-002/TL-21-190; and E-002/GS-21-191**

Dear Mr. Seuffert and Commissioners:

The Township of Becker, Minnesota ("the Township") submits the following comments to the Minnesota Public Utilities Commission ("PUC" or "the Commission") on the above referenced docket and petition for approval ("the Sherco Solar Project" or "the Project"). Xcel Energy ("Xcel" or "the Company") has owned and operated the Sherco power plant adjacent to Becker Township for about fifty years. During that time Xcel Energy has been a valued part of the community and good neighbor to the Township.

As stated in previous communications, Becker Township knows and fully understands the changes the utility industry is undergoing, and is not generally opposed to the Sherco Solar Project. However, the Town Board has significant concerns regarding the current site and routing proposals. Given these concerns, the Township is submitting the following comments in response to the Commission's inquiries as to Xcel Energy's site and route permit applications as outlined in the Commission's Notice of Comment Period dated May 4<sup>th</sup>.

The Sherco Solar application is not complete as it does not adequately address the environmental factors outlined in Minn. R. 7850.1900; specifically, with regard to Becker Township, Subpart 3 items B, C, and H respectively. The proposed solar project and related transmission lines would have significant impact it on the Township's transportation connections and business park. Xcel Energy did not fully analyze the impact the proposed project would have on the existing and future public road connections and the public health and safety hazards created by such. Subsequently, because these public road connection issues were not identified in in Subp. 3B, there were no mitigation effects analyzed as required under Subp. H.

The Township asserts there are contested issues of fact in the representations made by Xcel Energy in the site and route permit application. Pg 189 of the application states: "Following discussions thus far, Xcel Energy inquired to applicable participating landowners regarding these proposed road expansion plans, and the landowners indicated they had not been contacted regarding any road expansions to date."

While it is true that landowners had not been contacted regarding road expansions prior to the February 9, 2021 meeting of Township officials and Xcel Energy and NG Renewables representatives, the road issue was being investigated as to possible solutions to a safety issue. When planning roads, development is reviewed and alternatives discussed before contacting landowners. The Town Board was still in the investigatory phase of how to best facilitate safer traffic patterns for the area.

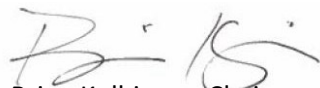
This expansive project, the largest project the Township has ever experienced, has sped up the Town Board's review of the area; however, as indicated earlier, no landowners were approached prior because the Township was still reviewing options. The Township was unaware of the Xcel's plans until shortly before the initial meeting with Xcel Energy and NG Renewables on February 9, 2021. That was the first time the Township officials were informed that this project will go forward without following the Township's zoning and other local regulations.

In consideration of the recent Notification of a Proposed Project received from Sherco Solar, township staff has analyzed the project's impact and requests PUC consideration of the following items. The Township Board and its Road Committee have significant concerns regarding the proposed solar project on the Town's transportation system thus creating significant public safety and mobility hazards.

Finally, the Township asks the PUC to not exempt this project from the Certificate of Need requirement. This request is based on significant size and scope of the proposed project and the impacts it will have on the natural, built, and economic environments of the Becker community. The Town Board values public participation in all aspects of government and feels a contested proceeding is the best way to ensure valuable public participation and meaningful involvement by all entities impacted by this expansive project.

Becker Township appreciates the opportunity to comment on the proposed Sherco Solar site and transmission project. We do not wish to obstruct the project but are merely asking the Commission to put the proper and necessary review procedures in place to ensure all voices are heard, all mitigation measures are analyzed, and all impacts weighed and evaluated before a final project is approved.

Respectfully,

A handwritten signature in black ink, appearing to read 'B. Kolbinger', is written over a horizontal line.

Brian Kolbinger, Chair  
Becker Town Board