

June 23, 2025

Mr. Will Seuffert, Executive Secretary
Minnesota Public Utilities Commission
127 7th Place East, Suite 350
Saint Paul, MN 55101-2147

RE: Alternatives Identified During Scoping Comment Period
Summit Lake Project
Docket Nos. IP-7153/GS-25-89, IP-7153/ESS-25-88

Dear Mr. Seuffert,

Department of Commerce, Energy Environmental Review and Analysis (EERA) staff have completed the environmental assessment scoping process in the following matter:

In the Matter of the Joint Application of Summit Lake Solar, LLC for a Site Permit for the 200 MW Solar Energy Generating System and 200 MW Battery Energy Storage System for the Summit Lake Project in Nobles County, Minnesota;

The scoping period for the environmental assessment (EA) was open from May 7, 2025, through June 5, 2025. Public meetings for the project were held on May 21 and 22, 2025. Oral and written comments were received from the public during the scoping period.¹ While none of these comments suggested an alternative site for the Summit Lake Solar generating facility, a comment regarding the siting of the Summit Lake Battery Energy Storage System (BESS) facility proposed that the BESS be moved to the north of the existing Nobles Substation.² The commenter noted that relocating the BESS farther from the unincorporated community of Reading would mitigate potential project impacts including noise pollution, fire risk, and changes to aesthetics.

EERA staff conferred with Summit Lake Solar, LLC (applicant) regarding the feasibility and potential impacts of relocating the BESS facility to an alternative site north or northeast of the BESS site that was proposed in the site permit application.³ The land directly north of the Nobles Substation is not owned or controlled by the applicant, which renders the relocation to the north side of the Nobles Substation unfeasible.

¹ Oral Comments Received on the Scope of the Environmental Assessment, eDockets No. [20256-219916-01](#); Written Comments Received on the Scope of the Environmental Assessment, eDockets No. [20256-219917-01](#)

² Written Comment, Kathy Henderschiedt, eDockets No. [20256-219544-01](#)

³ Joint Site Permits Application to the Minnesota Public Utilities Commission for: Summit Lake Solar Energy Conversion Facility and Battery Energy Storage System, eDockets [No. 20252-215674-01 to 20252-215674-14](#)

EERA staff also studied the feasibility of relocating the BESS to the portion of the proposed site located east of McCall Ave and south of 190th Street. Relocation to this portion of the site would require extensive excavation and grading to create a site suitable for a BESS facility due to hydrological factors. Relocation of the BESS would also extend the electrical line routing between the BESS and the proposed Project Substation by approximately 0.5-mile, which would result in electrical losses that would reduce the efficiency of the BESS unit. Finally, relocation would likely require movement of the Project Substation to be further from the Nobles Substation. Movement of the Project Substation would result in the gen-tie transmission line exceeding 1,500 feet, which would require a route permit from the Public Utilities Commission.

EERA staff recommends that the Commission authorize EERA to include solely the site for the project identified by Summit Lake Solar in its joint application in the scoping decision for the EA. While EERA staff does not recommend studying an alternatives site for the BESS facility due to the logistical issues identified above, EERA staff will identify measures to mitigate the concerns of the public regarding noise, safety, and aesthetics in the EA. Potential mitigation measures include, but are not limited to: noise barriers or berms, vegetative screening, and emergency response training and resources to assist local first responders.

EERA staff is available to answer any questions the Commission may have.

Sincerely,

A handwritten signature in black ink that reads "Sam Weaver". The signature is written in a cursive, flowing style.

Sam Weaver
Environmental Review Manager
Energy Environmental Review and Analysis