Appendix C

Solar Size Determination Form and Response

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COMMERCE DEPARTMENT

November 2, 2022

Jason Risdall Enbridge Energy, Limited Partnership 11 East Superior Street, Suite 125, Duluth, MN 55802 Telephone No: 218-348-5991 Email: Jason.Risdall@enbridge.com

Dear Jason Risdall:

On October 6, 2022 the Department received a Solar Size Determination request for Enbridge Solar (Plummer), LLC's proposed 130 MW solar project in Red Lake County.

The Department is responsible for reviewing these applications to determine "whether a combination of solar energy generating systems meets the definition of large electric power generating plant and is subject to the commission's siting authority jurisdiction" (Minnesota Statute 216E.021, Subd. a).

Currently, Enbridge and its subsidiaries are not pursuing other utility scale solar projects in Minnesota. Plummer Solar is an independent power producer and wholly-owned subsidiary of Enbridge Holdings (Green Energy) L.L.C. Plummer Solar is a renewable energy development company that will construct, own, and operate the proposed project. Based on information provided by the Applicant, and based on criteria established in the statute, the Department has determined that Enbridge Solar (Plummer), LLC is not associated with any other planned solar projects that would require them to be combined into a single project. However, given that the project on its own is 130 MW (over 50 MW), the Department determines that Enbridge Solar (Plummer), LLC is subject to the Public Utilities Commission's siting authority and must apply for a site permit under the Power Plant Siting Act (Minnesota Statute 216E).

The Department reserves comment at this time on any of the other applications associated with this project, such as Certificate of Need.

Enbridge Energy has the right to dispute this determination with the Chair of the Public Utilities Commission.

I am available to answer any questions you might have.

Sincerely,

Louise Miltich Energy Environmental Review and Analysis

cc: Bret Eknes, Public Utilities Commission Christina K. Brusven

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Minnesota Statute § 216E.021 requires combining proposed solar energy generating systems for permitting purposes when certain conditions exist. The Department of Commerce requires the information requested below to determine 1) whether proposed solar energy generating systems meet the definition of a large electric power generating plant and, therefore, are subject to the Public Utilities Commission's siting authority; or 2) whether large electric power generating plants that are solar energy generating systems should be combined for permitting purposes. Based on the information provided, Commerce staff may require additional information to make a determination.

Instructions: Answer each question completely. Each question and answer must be clearly identified. Attach maps and supporting information as necessary. Return the signed and dated information to:

Louise Miltich Minnesota Department of Commerce 85 Seventh Place East, Suite 280 Saint Paul, MN 55101-2198

Phone: (651) 539-1853 Fax: (651) 539-0109 Email: *louise.miltich@state.mn.us*

Note: This form can be made available electronically and submitted as an electronic document.

A. Project Description

Briefly describe the proposed project or projects, including name(s); need for the project(s); number of solar energy generating systems; alternating current nameplate capacity of the individual solar energy generating systems identified; and the combined alternating current nameplate capacity.

Enbridge Solar (Plummer), LLC ("Plummer Solar"), is proposing a solar energy generating system located in Emardville Township in Red Lake County, Minnesota (the "Project"). The planned output for the Project is up to 130 megawatts ("MW") alternating current ("AC") of nameplate solar-energy capacity located on approximately 700-800 acres. Plummer Solar plans to begin construction of the Project in 2025 and reach commercial operation by the end of 2025.

Plummer Solar has not made a final selection of solar panels but anticipates using approximately 323,064 PV panels for the Project. In addition to solar panels, the Project will consist of racking system, inverters, fencing, an electrical collection system, operations and maintenance ("O&M") facility, Project Substation and interconnection facilities, electrical cables, conduit, switchgear, step-up transformers, supervisory control and data acquisition ("SCADA") system, metering equipment, access roads, several weather stations, stormwater basins, laydown yard, and other infrastructure typical of a utility-scale solar facility. The Project will include a proposed approximately 350-foot long aboveground 115-kV transmission line that is needed to interconnect the Project to the grid at the existing Plummer Substation located immediately adjacent to the Project Area. The current layout and proposed equipment are preliminary and subject to change as the design advances.

The Project is needed to meet the growing demand for additional renewable resources in order to meet the Solar Energy Standard set forth in Minnesota Statutes and other clean energy requirements in Minnesota and neighboring states. Applications for a Certificate of Need ("CN") and Site Permit ("SP") will be submitted to the Minnesota Public Utilities Commission ("Commission") for the Project in the fourth

quarter 2022.

B. Project Design and Location

Provide the following information regarding each solar energy generating system:

B-1. Describe the 1) solar generating equipment and associated facilities; 2) project boundary location(s) (county, township, and sections); 3) the area within the project boundary (acres); and 4) area within the project boundary that will be developed for the solar project (acres).

- 1) The Project's permanent facilities will include:
 - Solar modules, inverters, and tracking rack structures;
 - Fencing;
 - Access roads;
 - O&M facility;
 - Project substation;
 - Electrical cables, conduit, switchgears, and metering equipment;
 - Step-up transformers;
 - Overhead transmission line (~350-foot length);
 - Electrical collection system;
 - SCADA system;
 - Several weather stations;
 - Stormwater basins; and
 - Ancillary equipment or buildings as necessary.
- 2) The Project is planned to be in Sections 15 (NE and NW quarters) and 14 (SE quarter), Township 151N, Range 42W in Red Lake County (see attached **Maps 1** and **2**).
- 3) The Project Area includes approximately 700-800 acres, depending on the final system design and layout.
- 4) Plummer Solar currently anticipates utilizing most of the area within the Project Area, except for areas that may be subject to applicable setbacks and public rights-of-way. A preliminary design is underway and will be included in the CN and SP application submittals. The exact acres utilized will depend on final design.

B-2. Describe the anticipated point of electrical interconnection. Describe interconnection requests and the status of each request. Provide any assigned project or queue interconnection numbers.

The Project will interconnect to the grid via a proposed approximately 350-foot long aboveground 115-kV transmission line that is needed to interconnect the Project to the grid at the existing Plummer Substation located immediately adjacent to the Project Area. The interconnection request is in the DPP 2022 queue (MISO Queue No. has yet to be assigned at this time). The Project is expected to enter into a Generator Interconnection Agreement ("GIA") in 2024.

B-3. Provide a map showing the proposed facility boundary, the interconnection site, anticipated solar module layout, and associated facilities. "Associated facilities" includes access roads, operation and maintenance facilities, collector and feeder lines, and substations. Maps should be at 1:24,000 scale using an imagery basemap. The map must include a legend and scale bar.

Maps 1 and **2** depict the location of the proposed Project, Project facilities, and the point of interconnection (existing Plummer Substation) as well as the preliminary layout and associated infrastructure of the proposed Project.

C. Project Characteristics

Provide the following information regarding each solar energy generating system:

C-1. List and describe the entity responsible for constructing the project.

A construction contractor has not been selected for the Project, but in any case, Plummer Solar is responsible for overseeing the construction contract.

C-2. List and describe the entity responsible for operating and maintaining the project.

Plummer Solar is an independent power producer and wholly-owned subsidiary of Enbridge Holdings (Green Energy) L.L.C. Plummer Solar is a renewable energy development company that will construct, own and operate the proposed Project. Plummer Solar will execute an operations and maintenance agreement with Enbridge Holdings (Green Energy) L.L.C.

C-3. Describe the ownership structure, sales agreement(s), interconnection(s), revenue sharing, debt or equity financing, and any other characteristics of the solar energy generating system. Include a statement indicating whether these characteristics are "independent" or "shared." If shared, indicate with what existing or proposed project.

Plummer Solar is an independent power producer and wholly-owned subsidiary of Enbridge Holdings (Green Energy) L.L.C. Plummer Solar is a renewable energy development company that will construct, own and operate the proposed Project.

The interconnection request for this Project is 130 MW. Plummer Solar is not aware of any other solar facilities planned to interconnect at this location. Plummer Solar is proposing to construct this facility to sell energy, capacity and renewable energy credits, either bundled or unbundled, to one or more electric utilities and/or commercial customers. Plummer Solar plans to sell the power from the Project to an off-taker through a Power Purchase Agreement ("PPA") or similar contractual agreement.

Debt or equity financing has not yet been secured for the Project, but Plummer Solar anticipates that financing for the Project will be independent of any other solar energy projects.

C-4. Provide the anticipated schedule for completion, including dates for permitting, construction (start and end dates), and commercial operation.

Plummer Solar plans to file CN and SP applications in the fourth quarter of 2022 so that it receives Commission approval of the Project in 2023. Construction currently is anticipated to begin in 2025 with commercial operation by the end of 2025.

D. Applicant Information

D-1. Provide the name, address, email, and telephone number of the applicant and any authorized representative.

Applicant:

Enbridge Solar (Plummer), LLC 5400 Westheimer Court Houston, TX 77056-5310

Representatives:

Jason Risdall Enbridge Energy, Limited Partnership 11 East Superior Street, Suite 125, Duluth, MN 55802 Telephone No: 218-348-5991 Email: Jason.Risdall@enbridge.com

Christina K. Brusven Fredrikson & Byron, P.A. 200 South Sixth Street, Suite 4000 Minneapolis, MN 55402 Direct: 612-492-7412 Email: <u>cbrusven@fredlaw.com</u>

D-2. Provide the name, address, e-mail, and telephone number of the person or persons who would prepare the application to the Public Utilities Commission or to a Minnesota county or local unit of government, if such an application would be prepared by an agent or consultant of the applicant.

Christina K. Brusven Fredrikson & Byron, P.A. 200 South Sixth Street, Suite 4000 Minneapolis, MN 55402 Direct: 612-492-7412 Email: <u>cbrusven@fredlaw.com</u>

D-3. Briefly describe the applicant's business entity including its ownership and financial structure.

Plummer Solar is a wholly-owned subsidiary of Enbridge Holdings (Green Energy) L.L.C.

The following ownership chart shows the ownership structure for Plummer Solar:

ENBRIDGE SOLAR (PLUMMER), L.L.C. OWNERSHIP STRUCTURE





Note: Information contained on this organization chart is strictly confidential and intended for internal company use only. As this information may change without circulation, the accuracy of the information provided should be verified with Enbridge Inc., Corporate Secretarial Group, prior to any action being taken in reliance of the material provided.

Enbridge is a diversified energy company operating in North America and beyond. As a diversified energy company, Enbridge is uniquely positioned to help accelerate the global transition to a cleaner energy future. Enbridge is advancing new low-carbon energy technologies including hydrogen, renewable natural gas, and carbon capture and storage. Enbridge is committed to reducing the carbon footprint of the energy we deliver, and to achieving net zero emissions by 2050.

Enbridge has a diversified portfolio of renewable energy projects including 23 wind farms, 17 solar energy operations, 5 waste heat recovery facilities, and other renewable generation facilities. Since Enbridge's initial investment in a wind farm in 2002, Enbridge has committed more than \$6 billion in capital to renewable energy and power transmission projects currently in operation or under construction. Together, Enbridge's renewable energy projects have the capacity to generate 5,192 megawatts gross of zero-emission energy (2,175 megawatts net).

D-4. Provide the Minnesota Secretary of State organizational ID number for the applicant business entity, all subordinate entities, and all solar developer entities involved with the project.

Plummer Solar's Minnesota Secretary of State organizational identification file number is 1319408400029. Plummer Solar does not have any other subordinate entities involved with the Project.

D-5. Identify and provide contact information for the person or persons who would be the permittees, if different than the applicant, if the solar energy generating systems were permitted by the Public Utilities Commission or a Minnesota county.

The Permittee is Plummer Solar, who is also the applicant. The applicant contact information is provided in Part D-1 above.

E. Other Projects in Minnesota

E-1. Identify any planned or existing solar energy generating system(s) in Minnesota in which the applicant, or a principal, partner, or affiliate of the applicant, has an ownership or other financial interest. Describe any facilities identified, including their location, alternating current nameplate capacity, and their interconnection requests.

While neither Plummer Solar nor any other entity under the parent company Enbridge Inc. currently operate any other solar energy generating systems in Minnesota that were permitted or otherwise subject to the jurisdiction of the Commission, Enbridge Holdings (New Energy) L.L.C. is completing detailed design on the following solar projects in Minnesota: Deer River (15 MWac) (Itasca County), Floodwood (11 MWac) (St. Louis County), and Cass Lake (10 MWac) (Cass County). These projects are behind-the-meter or "self-power" projects that total 36 MWac.

E-2. Identify any additional solar energy generating system(s) in Minnesota in which the applicant, or principal, partner, or affiliate of the applicant, has an ownership or other financial interest and is currently under construction or construction is planned to begin within 12 months of the proposed project(s) estimated completion date. Describe any facilities identified, including their location, alternating current nameplate capacity, and their interconnection requests.

Construction on the planned Enbridge Holdings (New Energy) L.L.C. projects in Deer River (15 MWac) (Itasca County), Floodwood (11 MWac) (St. Louis County), and Cass Lake (10 MWac) (Cass County) is expected in 2023-2024. As detailed above in E-1, these projects are behind-the-meter or "self-power" projects that total 36 MWac.

E-3. Identify any planned or existing solar energy generating system(s) in Minnesota which that shares any of the following with the proposed project: power purchase agreement, interconnection, sales, revenues, debt or equity financing, or other ownership or financial interests. Describe any facilities identified, including their location, alternating current nameplate capacity, and their interconnection requests.

Plummer Solar and other entities under the parent company Enbridge Inc. do not have any planned or existing solar energy generating systems in Minnesota that share a power purchase agreement, interconnection, sales, revenues, debt or equity financing or other ownership or financial interests with the proposed Project.

Attachments:

Map 1

Map 2



Plummer Solar Project

Red Lake County, Minnesota Oct 4, 2022 Author: Errol Halberg NAD83 State Plane Minnesota North FIPS 1:24,000

ENBRIDGE

Legend

- Existing Adjacent Residence
- **O** Project Entrances
- Point of Interconnection
- Project Solar Arrays
 - Project Fence
 - Project Transmission Line
 - Existing Transmission Line
- Project Road
 - Project Collector Substation
- Project Laydown Area
- Project Inverters
- Project Operations Facility
- 190th Project Area Boundary

Map 1

AO, NOAA, USGS, © GIS User <u>Community</u>



Plummer Solar Project

Red Lake County, Minnesota Oct 4, 2022 Author: Errol Halberg NAD83 State Plane Minnesota North FIPS 1:10,000



Legend

230th Ave SE

80th

- Existing Adjacent Residence
- Project Entrances \bigcirc
- O Point of Interconnection
- Project Solar Arrays
- Project Fence
- **Project Transmission Line**
- Existing Transmission Line
- Project Road
 - Project Collector Substation
- Project Laydown Area
- Project Inverters
- Project Operations Facility
- Project Area Boundary

Map 2

230th Av

190th St