

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

In the Matter of the Application of Castle Rock Solar, LLC for a Site Permit for the up to
150 MW Castle Rock Solar Project in Dakota County, Minnesota

MPUC Docket No. IP7137/GS-24-267

CAH Docket No. 65-2500-40800

**DIRECT TESTIMONY OF ANDREW S. CAMPBELL
ON BEHALF OF CASTLE ROCK SOLAR, LLC**

October 10, 2025

1 I. INTRODUCTION AND QUALIFICATIONS

2
3 Q. Please state your name, employer, and business address.

4 A. My name is Andrew Campbell. I am the Head of Commercial Origination & Market
5 Strategy – North America, at Atlantica Sustainable Infrastructure. My business
6 address is 1553 W Todd Dr, Tempe, Arizona 85283.

7
8 Q. Please briefly describe your educational background and professional
9 experience.

10 A. I graduated from Purdue University with a Bachelor of Science Degree in
11 Engineering and completed Graduate Studies in Engineering at Purdue. I also
12 received a Master of Business Administration from the University of Notre Dame.
13 I served in leadership roles with the Army National Guard for 12 years—from 2001
14 to 2013. I've worked in the energy industry since 2009, including more than a
15 decade of experience with the Northern Indiana Public Service Company
16 (NIPSCO), and have worked in utility scale solar since 2023. I am Head of
17 Commercial Origination & Market Strategy, responsible for identifying sites for
18 renewable energy facilities, permitting and regulatory efforts, and developing safe,
19 sustainable, and reliable projects.

20
21 Q. For whom are you testifying?

22 A. I am testifying on behalf of Castle Rock Solar, LLC (Castle Rock Solar). As noted
23 in an August 19, 2025 letter filed to the docket, Castle Rock Solar was acquired by
24 Atlantica North America LLC, effective May 5, 2025. Atlantica North America is a
25 wholly owned subsidiary of Atlantica Sustainable Infrastructure PLC (ASI), a global
26 sustainable infrastructure company focused on renewable energy. ASI currently
27 owns 48 assets, including a 2.2 GW portfolio of assets in operation. ASI is a leading
28 owner and operator of renewable energy plants in North America. As the
29 authorized agent of Castle Rock Solar, Atlantica North America will manage
30 ongoing development and construction activities for the Castle Rock Solar Project
31 (the Project).

1 **Q. What is your role with respect to the Project?**

2 A. I lead the team that is responsible for bringing the energy generated by the Project
3 to market.

4

5 **II. PURPOSE OF TESTIMONY**

6

7 **Q. What is the purpose of your Direct Testimony?**

8 A. I will provide an overview of the Project, updates on the Project schedule, discuss
9 site plan updates and the landscaping plan, and provide an update on coordination
10 with agencies. In addition, I will discuss how Castle Rock Solar will procure panels
11 that will not be harmful to the environment.

12

13 **Q. What schedules are attached to your Direct Testimony?**

14 A. The following schedules are attached to my Direct Testimony:

- 15 • **SCHEDULE A**: Statement of Qualifications
- 16 • **SCHEDULE B**: Landscaping Plan
- 17 • **SCHEDULE C**: SHPO Concurrence

18

19 **III. PROJECT OVERVIEW**

20

21 **Q. Please provide a summary of the Project, including the proposed location
22 and proposed site.**

23 A. The Project consists of a proposed up to 150 megawatt (MW) alternating current
24 photovoltaic solar energy generating system and associated facilities in Castle
25 Rock Township, Dakota County, Minnesota.

26

27 **Q. Why did Castle Rock Solar choose the Project Area as presented in the
28 Application to build the Project?**

29 A. Castle Rock Solar first identified areas of Minnesota with adequate solar resources
30 to host a solar Project, then identified potential locations for a point of
31 interconnection with available capacity. Castle Rock Solar identified the proposed

1 Project location after determining the existing Xcel Energy Chub Lake to Hampton
 2 Corners 345 kV transmission line has enough capacity to interconnect to the
 3 Project and it is located within two miles of the City of Farmington. From there,
 4 Castle Rock Solar identified areas with enough landowners to voluntarily agree to
 5 host the Project. Castle Rock Solar possesses signed landowner agreements for
 6 all parcels proposed to host Project facilities. As part of this iterative process,
 7 Castle Rock Solar also considered land that may be unavailable or restricted,
 8 environmental impacts, construction restrictions such as slopes, soils, and
 9 potential recognized environmental concerns, and other landowner preferences.
 10 This process included a discussion with landowners regarding potential locations
 11 of panels, fences, and access roads.

12
 13 **IV. PROJECT UPDATES**

- 14
 15 **Q. Has the anticipated schedule for the construction of the Project changed**
 16 **from what was contemplated in the Application?**
 17 A. Yes. The Permit Application, noted that the Project was expected to be operational
 18 by the fourth quarter of 2028. The Project is now expected to be constructed and
 19 operational by the fourth quarter of 2029. The updated anticipated Project timeline
 20 is as follows:

Activity	Site Permit Application Timeline
Site Permit Issued	First Quarter 2026
Generator Interconnection Agreement (GIA) Execution	First/Second Quarter 2026
Commencement of Construction	First Quarter 2028
Testing and Commissioning	Third / Fourth Quarter 2029
Operation	Fourth Quarter 2029

- 21
 22 **Q. Do you have any other updates related to the Project?**
 23 A. No. There have been no other changes to the Solar Project. As previously noted,
 24 Castle Rock Solar is exploring the possibility of seeking a site permit for a Battery

1 Energy Storage System (BESS) within the Project Area. If Castle Rock Solar
2 decides to add a BESS within the Project Area, Castle Rock Solar will apply
3 separately for a site permit for the BESS, pursuant to Minnesota Statutes chapter
4 216I.

5
6 **Q. Do the updates to the design change anything about the anticipated impacts
7 of the Project?**

8 A. The BESS will be evaluated independently under state law, including independent
9 environmental review. Accordingly, any potential impacts from the BESS do not
10 change the anticipated impacts from this Project.

11
12 **V. SITE PLAN UPDATES**

13
14 **Q. Have there been any updates to the site plan since the Application was
15 submitted?**

16 A. Yes. As identified in a letter filed to the docket on April 22, 2025, Castle Rock Solar
17 signed lease agreements with the landowner of PID 070090052013 and PID
18 070090029010 on April 16, 2025, resulting in the addition of 77 acres of land. With
19 this addition, the total Project Area is 1,384 acres.

20
21 **Q. The Application notes that on-site wetland delineations for the Application
22 Project Area were completed, and a Notice of Decision (NOD) for boundary
23 concurrence was issued for the delineation of wetlands within the
24 Application Project Area on February 23, 2024 (Application at 97, Appendix
25 K). Has a wetland delineation been completed for the additional 77 acres of
26 land?**

27 A. Yes. A field study for the delineation of wetlands on the additional 77 acres has
28 been completed. On October 3, 2025, the Dakota Soil and Water Conservation
29 District (SWCD), as the local government unit administering the Wetland
30 Conservation Act, together with representatives from the Technical Evaluation
31 Panel (TEP) reviewed the delineated wetland boundaries. Dakota SWCD and the

1 TEP recommended some updates to the wetland boundaries to reduce the size of
2 the delineated wetlands in some areas. The reduction in wetland size means the
3 Project will continue to avoid wetland impacts in this area. Castle Rock Solar
4 continues to work with Dakota SWCD and the TEP on finalizing the wetland
5 delineation boundaries and anticipates receiving a NOD concurring with the
6 delineated wetland boundaries in the near future.

7
8 **Q. Do you have other updates to the plan for the site?**

9 A. Yes. Since the Application was submitted, Castle Rock Solar has developed a
10 landscape plan by working with landowners living directly adjacent to the Project.

11
12 **Q. Can you describe the current landscaping plan?**

13 A. Yes. The plan currently includes two segments of landscaping along the northern
14 boundary of the Project that are approximately 2,071 and 2,351 feet in length.
15 There are three segments along 230th Street west that are approximately 1,861
16 feet, 573 feet, and 589 feet in length. There is one segment along 240th Street that
17 is approximately 470 feet in length. A copy of the current landscaping plan is
18 attached as **Schedule B**. Castle Rock Solar will continue discussions with adjacent
19 landowners regarding vegetative screening as needed.

20
21 **VI. COORDINATION WITH SHPO AND AREA LANDOWNERS**

22
23 **Q. Has Castle Rock Solar completed any additional studies or agency
24 coordination since filing its Application?**

25 A. Yes. Castle Rock Solar has coordinated with the Minnesota State Historic
26 Preservation Office (SHPO).

27
28 **Q. Do you have any updates regarding SHPO coordination since the
29 Application was filed?**

30 A. Yes. The Project had previously been reviewed, and SHPO provided a letter, on
31 December 12, 2024 (See Site Permit Application, Appendix C). After that date, an

1 additional 77 acres were added to the Project Area. By letter dated March 19, 2025,
2 the Commission authorized the Applicants to initiate formal consultation with
3 Minnesota SHPO. Accordingly, on July 29, 2025, Castle Rock submitted a report,
4 *Phase I Archaeological Survey Addendum Report for Castle Rock Solar Project,*
5 *Dakota County, Minnesota,* to SHPO for the additional 77 acres that were not
6 previously reviewed by SHPO. On September 5, 2025, SHPO responded,
7 concluding that, “[b]ased on the results of the survey, we have determined that
8 there are no known or suspected archaeological resources that will be affected by
9 the revised project and that there are no properties listed in the National or State
10 Registers of Historic Places, or within the Historic Sites Network, that will be
11 affected by this project.” A copy of the SHPO response is attached as **Schedule**
12 **C.**

13
14 **VII. TCLP TESTING**
15

16 **Q. Can you address any concerns members of the public may have regarding**
17 **the potential for photovoltaic (PV) panels to release hazardous materials?**

18 A. Yes. PV solar panels are nearly entirely encapsulated in glass and aluminum,
19 which are not hazardous materials. If a PV solar panel is broken at the Project, the
20 broken pieces and the remainder of the panel will be recycled or disposed of and
21 replaced, thereby further reducing the risk for hazardous materials contained in the
22 PV solar panels to leach into the environment. PV solar panels may, however,
23 contain small amounts of metals that are, by themselves, characterized as
24 hazardous materials by the United States Environmental Protection Agency (EPA).
25 When panels are disposed of at recycling facilities or landfills, the characteristics
26 of those elements and the likelihood that they will leach from the PV solar panels
27 into the environment must be determined and reported. Many manufacturers of PV
28 solar panels are taking proactive actions to determine the potential for the metals
29 contained in PV solar panels to leach from the panels during operation of the panel
30 or if it is broken into pieces. The EPA-approved method for determining whether a
31 hazardous substance is likely to leach from a manufactured product into the

1 ground and ground water is the Toxicity Characteristic Leaching Procedure
2 (TCLP). While it is too early to identify the PV panel manufacturer that will be used
3 for the Project, Castle Rock Solar will ensure that TCLP testing has been
4 performed on the panel models used for the Project. As noted, TCLP testing will
5 confirm that no hazardous materials (including arsenic, barium, cadmium,
6 chromium, lead, mercury, selenium or silver) will leach from the tested products
7 resulting in leachate concentrations above the EPA's regulatory thresholds.

8
9 **VIII. CONCLUSION**

10
11 **Q. Does this conclude your Direct Testimony?**

12 **A. Yes.**

Education & Training



University of Notre Dame – Master of Business Administration



Purdue University Northwest – Bachelor of Science Engineering & Graduate Studies in Engineering

Highlights

- Energy expertise across electric, natural gas, transmission, and utility sectors, plus deep knowledge of the broader U.S. energy marketplace.
- Experience in transmission development, including a 70-mile 765 kilovolt (kV) joint venture line, two 345kV lines, and multiple substations/switchyards.
- Led the siting, development, and execution of turnkey generation and infrastructure projects, including combined cycle gas turbine (CCGT) plants, renewables, storage assets, gas infrastructure, and thermal upgrades.
- Trusted leader in regulatory, policy, and stakeholder engagement—advancing initiatives in renewable energy, distributed generation, utility rates/tariffs, and emerging hyperscale/data center loads

Professional Experience

Atlantica Sustainable Infrastructure | *Sep 2025 – Present*

Head of Commercial Origination & Market Strategy – North America

- Leadership of an organization charged with defining growth strategy and siting opportunities, market policy, regulatory, and financial modeling.
- Developed and fostered strategic relationships with utilities and other interested parties to link market insights with site selection and support project development teams.

Hanwha Renewables / Hanwha Qcells USA | *Dec 2023 – Sep 2025*

Senior Director – Power Marketing & Origination; Development – North America

- Originated utility-scale solar and storage power purchase agreements (PPAs).
- Built partnerships with stakeholders to drive sustainable growth. .

NiSource – Northern Indiana Public Service Company (NIPSCO) | *Jun 2009 – Jan 2024*

Director – Portfolio Planning & Origination | *Sep 2017 – Jan 2024*

Energy Supply & Optimization / Corporate Strategy

- Directed utility's coal-to-clean transition, leading strategy for renewables, storage, and flexible natural gas; over 4 GW of projects, representing \$4B in utility investment opportunity.

- Oversaw \$1B+ annual regulatory recovery, covering forecasting, integrated resource planning (IRP), hedging, settlements, and gas/electric optimization in the Midcontinent Independent System Operator (MISO) region.
- Advanced commercial & industrial customer solutions through innovative rates, riders, and regulatory approvals.
- Introduced environmental programs including renewable energy credits (RECs), renewable natural gas (RNG), and carbon offsets; contributed to hydrogen pilots.
- Influenced enterprise capital decisions via Capital Allocation Committee and Utility Transformation Program.

Earlier Roles at NiSource & NIPSCO | *Jun 2009 – Sep 2017*

- **Manager – Planning & Regulatory Support**
- **Portfolio Manager (Rotational)**
- **Manager – Operations & Market Support**
- **Operations Engineer I & II**

Hadady Corporation | *Dec 2005 – Jun 2009*

- Advanced through multiple engineering roles, ultimately leading quality control and Six Sigma initiatives. Oversaw new 50,000 sq. ft. facility construction and commissioning.

Army National Guard | *Feb 2001 – Feb 2013*

September 5, 2025

Frederick Redell
Atlantica EVP North America
Atlantica Development Company LLC

RE: Castle Rock Solar Project – Addendum
Construction of a 150 megawatt-alternating-current photovoltaic electricity-generating facility and associated infrastructure
Castle Rock Twp, Dakota County
SHPO Number: 2025-0144

Dear Frederick Redell:

Thank you for continuing consultation on the above referenced project. As previously stated, this project will require a Minnesota Public Utilities Commission site permit. Therefore, the submitted information has been reviewed pursuant to the responsibilities given the State Historic Preservation Office by the Minnesota Historic Sites Act (138.665-666). If this project will be located on non-federal public land, the project will also be subject to review under the Minnesota Field Archaeology Act (138.40).

We previously provided comments on this project in a letter dated December 12, 2024. You have now advised us that the project has been revised, and that an additional 77 acres has been added to the project area. We have reviewed the submitted report, *Phase I Archaeological Survey Addendum Report for Castle Rock Solar Project, Dakota County, Minnesota* (July 29, 2025) as prepared by Stantec. Based on the results of the survey, we have determined that there are no known or suspected archaeological resources that will be affected by the revised project and that there are no properties listed in the National or State Registers of Historic Places, or within the Historic Sites Network, that will be affected by this project.

Please note that this comment letter does not address the requirements of Section 106 of the National Historic Preservation Act of 1966 and 36 CFR § 800. If this project is considered for federal financial assistance, or requires a federal permit or license, then review and consultation with our office will need to be initiated by the lead federal agency. Be advised that comments and recommendations provided by our office for this state-level review may differ from findings and determinations made by the federal agency as part of review and consultation under Section 106.

If you have any questions regarding our review of this project, please contact Kelly Gragg-Johnson, Environmental Review Specialist, at kelly.graggjohnson@state.mn.us.

Sincerely,



Amy Spong
Deputy State Historic Preservation Officer