

Fredrikson & Byron, P.A. Attorneys and Advisors

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August 1, 2025

VIA EFILING

Mr. Mike Bull Acting Executive Secretary Minnesota Public Utilities Commission 121 7th Place East, Suite 350 St. Paul, MN 55101-2147

Re: Supplemental Comments

In the Matter of the Application of Lemon Hill Solar, LLC for a Site Permit for the up to 180 MW Lemon Hill Solar Project in Olmsted County, MN MPUC Docket No. IP7156/GS-25-126

Dear Mr. Bull:

Lemon Hill Solar, LLC (Lemon Hill Solar), submits these supplemental comments pursuant to the Notice of Comment Period issued by the Minnesota Public Utilities Commission (Commission or PUC) on July 9, 2025¹ regarding the completeness of Lemon Hill Solar's Application for a Site Permit (Application) for an up to 180 megawatt (MW) alternating current photovoltaic solar energy generating facility and associated facilities known as the Lemon Hill Solar Project in Haverhill and Viola Townships in Olmsted County, Minnesota (Project) in the above-captioned docket.

As mentioned in Lemon Hill Solar's reply comments,² Lemon Hill Solar is now providing documentation in response to Commission Energy Infrastructure Permitting Staff's requests related to the Phase 1 Cultural Resource Survey in **Attachment A**. Lemon Hill Solar is also providing the updated Wetland and Waterbody Delineation Report in **Attachment B**.

In accordance with Minnesota Rules, part 7829.0500, and Minnesota Statutes Chapter 13, Lemon Hill Solar has designated portions of **Attachment A** as **NONPUBLIC DATA–NOT FOR PUBLIC DISCLOSURE** because it contains sensitive cultural resource. The Minnesota State Historic Preservation Office Manual for Archaeological Projects in Minnesota provides for restricted access to sensitive cultural resource information. Given the need to include nonpublic information, Lemon Hill Solar has prepared and is electronically filing both **NONPUBLIC** and public versions of **Attachment A**.

¹ See Notice of Comment Period on Application Completeness (July 9, 2025) (eDocket No. 20257-220777-01).

² See Lemon Hill Solar Reply Comments at 2, 3 (July 31, 2025) (eDocket No. 20257-221583-01).

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These supplemental comments have been e-filed through www.edocket.state.mn.us. A copy of this filing is also being served upon the persons on the Official Service List of record.

Please let me know if you have any questions regarding this filing.

Sincerely,

FREDRIKSON & BYRON, P.A.

Christina K. Brusven **Direct Dial:** (612) 492-7412

Email: cbrusven@fredlaw.com

In the Matter of the Application of Lemon Hill Solar, LLC for a Site Permit for the up to 180 MW Lemon Hill Solar Project in Olmsted County, MN.

CERTIFICATE OF SERVICE

Maia Martinez certifies that on the 1st day of August, 2025, she e-filed true and correct copy of the following documents on behalf of Lemon Hill Solar, LLC via eDockets (www.edockets.state.mn.us):

- Supplemental Comments;
- Attachment A Phase I Addendum 1 Report NONPUBLIC
- Attachment A Phase I Addendum 1 Report PUBLIC
- Attachment B Wetland Delineation Report Part 1 of 5
- Attachment B Wetland Delineation Report Part 2 of 5
- Attachment B Wetland Delineation Report Part 3 of 5
- Attachment B Wetland Delineation Report Part 4 of 5
- Attachment B Wetland Delineation Report Part 5 of 5
- Certificate of Service.

Said documents were also served as designated on the Official Service Lists on file with the Minnesota Public Utilities Commission and as attached hereto.

Executed on: August 1, 2025 Signed: /s/ Maia Martinez

Fredrikson & Byron, P.A. 60 South Sixth Street Suite 1500 Minneapolis, MN 55402

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402- 4400 United States	Electronic Service		No	GS-25-126
2	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	GS-25-126
3	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Attorney General -	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	GS-25-126
4	Ryan	Cox	rcox@fredlaw.com	Fredrikson & Byron, P.A.		60 S Sixth St Ste 1500 Minneapolis MN, 55402- 4400 United States	Electronic Service		No	GS-25-126
5	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	GS-25-126
6	Zane	Jones	zane@rangerpower.com	Lemon Hill Solar, LLC		320 N Sangamon Street, Suite 1025 Chicago IL, 60607 United States	Electronic Service		No	GS-25-126
7	Rosanne	Koneval	rosanne@rangerpower.com	Gopher State Solar, LLC		320 N Sangamon Street, Suite 1025 Chicago IL, 60607 United States	Electronic Service		No	GS-25-126
8	Alicia	LaValla	alavalla@fredlaw.com	Fredrikson & Byron, P.A.		60 South Sixth St Ste 1500 Minneapolis MN, 55402- 4400 United States	Electronic Service		No	GS-25-126
9	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	GS-25-126
10	Sergio	Trevino	sergio@rangerpower.com	Lemon Hill Solar, LLC		320 N Sangamon Street, Suite 1025 Chicago IL, 60607 United States	Electronic Service		No	GS-25-126