

I am submitting a comment in strong opposition to the Summit Lake Solar and Battery Energy Storage System being considered for development in Nobles County, MN.

The Project (referring to the Summit Lake Solar and Battery Energy Storage System as a whole) as presented to the Public Utilities Commission not only represents a detriment to the quality of life to the surrounding residents, but changes the ecology of the land forever which in turn poses a threat to the immediate environment, habitats, and future of the usability of the land to sustain life.

The Project presents dangers beyond what can be mitigated through permitting conditions alone. Permitting conditions and regulations do not change the incompatibility that The Project presents to the area.

In regards to human health and quality of life, numerous residents have submitted their concerns to the Commission. The Project introduces an industrial hum to an agricultural zone. While projected to not exceed 50decibels at nearby residences, the decibels compound exponentially upon the existing infrastructure nearby and the operating level of decibels within the homes of residences already. Another concern is the decrease in property value to the surrounding residents' homes that occurs immediately at the commencement of approval for development of The Project. This greatly reduces quality of life for the future of those residents residing in the area affected and poses a threat to not only their physical well-being, but mental health and financial security, as well. The long-lasting health impacts are also unclear and very clearly understudied. The project developer claims that the Solar Panels projected to be used do not leech heavy metals into the ground and groundwater; however, the specific solar panels to be used for The Project have NOT been selected, nor have groundwater studies been performed, planned, or required prior to, during, or after The Project enters the area. This shows a lack of transparency and accountability on not only the developer, Geronimo, but a lack in safety concerns by the permitting conditions and regulations. There are numerous health implications that a project of this regards, not only in structure but in size as well, that are severely understudied due to the infancy of the types of these particular projects within the nation. Until human health, safety, and quality of life can be guaranteed, there should be NO risk without 100% willing-participation of those residents in the direct vicinity of The Project. The residents have expressed that they are NOT willing participants to the types of risk that The Project poses to their health, safety, and quality of life.

In regard to the environment and ecology of the area, there has not been a project of this nature in both structure and size that has existed long enough to meet and perform the projected end of project life at 30 years to begin the decommission phase. Land disturbance, soil disruption and compaction, and habitat alteration present a permanent

and structural change to the land. Thoroughfare of animals to the area will be severely altered simply by the size of The Project, changing the habits and habitats of local wildlife. The soil compaction caused by 30+ years of use of The Project, presents a problem when decommissioning the land to return to farm/agricultural use within the timeline presented (12-18 months, per the April 6th comment and answer session hosted). Again, this shows that current permitting conditions are simply not enough to prevent, nor mitigate risk.

The Project contributes to a broader pattern of industrialization of rural farmland tied to external energy and data demands. Local communities are being asked to absorb the environmental and social costs of infrastructure that primarily serves distant users. That is not a balanced or equitable outcome. Per comment and answer session hosted on April 6th, The Project is projected to have a capacity to produce and store 4 hours of usable energy per battery/20acre parcel of solar panels. At 1,400acres of solar panels developed, that equates to 2,800hours of stored energy. This value equates to 116 days of stored energy. This presents a direct misuse and abuse of the land. The Project states that its aim is to provide usable to the nearest demand. There is NO demand to the direct area that would require this large of a project to occur. Furthermore, the developer is not “privity to the information” regarding the capacity and ability of the nearby substation and surrounding transmission lines, meaning that The Project can be developed without guarantee that the existing infrastructure needed to make The Project usable by Nobles County or nearby counties, is simply unknown. If calculations are incorrect, and this project only stores 4 hours of energy in total rather than per battery, the implications remain the same – this is a complete misuse and abuse of the land. To take out 1,900acres of productive farmland, that should be protected by Minnesota Statute 216E.03, for 4 hours of energy, is a highly ineffective use of the land and does not justify the conversion of prime farmland for industrial use.

Should The Project be permitted by the Commission, the Commission should require:

- 100% participation by residents in the direct vicinity of The Project, requiring The Project to adhere to each resident’s predetermined number of appropriate feet setback.
- Independent third-party monitoring and enforceable compliance board, that is NOT provided by the developer, Geronimo.
- An environmental study done on the wells and groundwater prior to the approval of The Project, during the construction phase of The Project and at regular intervals after completion of The Project.
- A 100% cash-backed decommissioning bond filed prior to the first day of construction, independent of any corporate parent’s solvency to mitigate risk of The

Project owner/developer corporate restructuring or bankruptcy filing within the first decade to protect the security of the decommissioning phase.

Approval by the Commission on the current record would be inconsistent with the Commission's statutory obligations and does not change the fundamental incompatibility of this project with its current location, size, and projected usability.

For these reasons, I urge the Commission to deny the permit for the Summit Lake Solar and Battery Energy Storage System project.

Thank you.

Haley Slater