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To: [Staff, CAO \(PUC\)](#)
Subject: Submitted Public Comment Form
Date: Tuesday, April 1, 2025 2:39:35 PM

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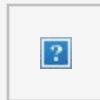
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Provide the docket's number. IP-7119/GS-24-106

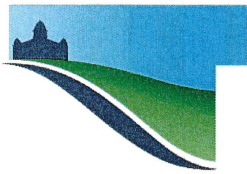
Leave a comment on the docket. * Please see attached file.

Attach a File



[gopher_state_solar_comments_submitted_to_administrative_law_judge_412025.pdf](#)

1.14 MB • PDF



**In the Matter of Application of Gopher State Solar, LLC for a Site Permit for the up to 200 MW
Solar Project in Renville County, MN**

Docket No. IP-7119/GS- 24-106
OAH Docket No: 24-2500-40416

April 1, 2025

To Whom It May Concern:

Thank you for the opportunity to provide comments on this matter. Renville County has reviewed the application submitted by Gopher State Solar, LLC, and respectfully submits the following comments for consideration.

1. Noxious Weeds (Section 4.3.21)

The draft permit currently states:

"The Permittee shall take all reasonable precautions against the spread of noxious weeds during all phases of construction."

We respectfully request that this language be revised to:

"The Permittee shall take all reasonable precautions against the spread of noxious weeds throughout the life of the Project, including during construction."

This revision ensures long-term management of noxious weeds beyond the construction phase.

2. Decommissioning Costs and Financial Assurances (Section 5.4)

The draft permit states:

"The Permittee shall coordinate with Renville County to develop a mutually agreeable decommissioning plan consistent with Section 9.1 of the permit."

However, it is unclear what would happen if Renville County and Gopher State Solar, LLC, cannot reach a mutual agreement. We request clarification on how such disputes would be resolved.

Renville County remains engaged in discussions with Gopher State Solar, LLC, regarding the need for a financial bond covering the full cost of decommissioning the project. Gopher State Solar has estimated the total cost of decommissioning at **\$7,034,025**, with an estimated salvage value of **\$5,593,708**, leaving a net decommissioning cost of **\$1,440,317** after considering salvage value. However, Renville County believes this estimate is insufficient. Based on current information, we estimate the full cost of decommissioning at **\$21 million**, excluding potential salvage value or site demolition expenses.

Since the County is not in the business of selling solar products, our estimate reflects the total funds required for proper decommissioning at current market rates. Renville County seeks assurance that these costs will not ultimately fall on taxpayers.

Additionally, a **125 MW** solar project proposed in Renville County has estimated decommissioning costs at **\$13,447,226**, with a potential maximum cost of **\$20,170,838**. After accounting for salvage value, their estimated net cost ranges from **\$3,334,478 to \$5,015,217**.

Given this comparison, how can Gopher State Solar's estimated decommissioning cost be nearly **\$6.5 million lower** than a smaller project before factoring in salvage value?

While the risk of the County assuming responsibility for decommissioning is low, Renville County has a duty to protect taxpayers from a worst-case scenario.

Renville County respectfully requests the following:

1. An independent decommissioning cost assessment be conducted by a third-party firm agreed upon by both parties, with the cost of the assessment covered by Gopher State Solar, LLC.
2. The following language be added to Gopher State Solar's decommissioning plan:

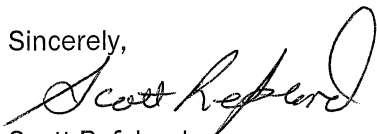
In the event the Project Owner fails to fully decommission the Project and/or funds in the Decommissioning Account are insufficient to cover the full cost of decommissioning, the County shall have the right to recover the remaining decommissioning costs through all legally available remedies, including but not limited to:

- *Placing a lien on the property or properties associated with the Project, pursuant to applicable state and local laws.*
- *Initiating legal action to obtain civil judgements or other court-ordered remedies against the Project Owner and, if applicable, the landowners, to recover outstanding decommissioning costs.*

The Project Owner shall bear the primary responsibility for decommissioning. However, if recovery from the Project Owner is unsuccessful, landowners may also be held liable as permitted by law.

Again, thank you for the opportunity to provide comments.

Sincerely,



Scott Refsland
Environmental Services Director