

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben
Hwikwon Ham
Valerie Means
Joseph K. Sullivan
John A. Tuma

Chair
Commissioner
Commissioner
Commissioner
Commissioner

In the Matter of the Application of Coneflower
Energy, LLC for a Site Permit for the up to
235 MW Coneflower Solar Project in Lyon
County, Minnesota

SERVICE DATE: October 15, 2024

DOCKET NO. IP-7132/GS-24-215

The above-entitled matter has been considered by the Commission and the following disposition made:

- 1. Accepted Coneflower Energy, LLC's site permit application as complete.**
- 2. Declined to appoint an advisory task force at this time.**
- 3. Requested a full Administrative Law Judge's report with findings of fact, conclusions of law, and recommendations for the project's public hearing.**
- 4. The Commission delegated authority to the Executive Secretary to issue an authorization to the applicant to initiate consultation with the Minnesota State Historic Preservation Office (SHPO).**

This decision is issued by the Commission's consent calendar subcommittee, under a delegation of authority granted under Minn. Stat. § 216A.03, subd. 8 (a). Unless a party, a participant, or a Commissioner files an objection to this decision within ten days of receiving it, it will become the Order of the full Commission under Minn. Stat. § 216A.03, subd. 8 (b).

The Commission agrees with and adopts the recommendations of the Department of Commerce, which are attached and hereby incorporated into the Order.



BY ORDER OF THE COMMISSION

A handwritten signature in black ink, appearing to read "Will Seuffert".

Will Seuffert
Executive Secretary

To request this document in another format such as large print or audio, call 651.296.0406 (voice). Persons with a hearing or speech impairment may call using their preferred Telecommunications Relay Service or email consumer.puc@state.mn.us for assistance.

September 10, 2024

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

RE: EERA Comments and Recommendations on Application Completeness
Coneflower Solar Project – Site Permit Application
Docket No. IP-7132/GS-24-215

Dear Mr. Seuffert,

Attached are comments and recommendations of Department of Commerce, Energy Environmental Review and Analysis (EERA) staff in the following matter:

In the Matter of the Application of Coneflower Energy, LLC for a Site Permit for the up to 235 MW Coneflower Solar Project in Lyon County, Minnesota

The site permit application was filed on August 19, 2024, by:

Garrick Valverde
Apex Clean Energy, Inc.
8665 Hudson Boulevard North, Suite 200
Lake Elmo, MN 55042

EERA staff recommends that the Commission accept the application as substantially complete and request that Coneflower Solar provide estimated project schedules for both interconnection scenarios and, upon completion of the State Historic Preservation Office review, file a Phase I cultural resources survey for the project. EERA staff is available to answer any questions the Commission may have.

Sincerely,



Lauren Agnew
Environmental Review Manager

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BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

ENERGY ENVIRONMENTAL REVIEW AND ANALYSIS COMMENTS AND RECOMMENDATIONS

CONEFLOWER SOLAR PROJECT DOCKET NO. IP-7132/GS-24-215

Date: September 10, 2024

EERA Staff: Lauren Agnew | 651-539-1838 | Lauren.Agnew@state.mn.us

In the Matter of the Application of Coneflower Energy, LLC for a Site Permit for the up to 235 MW Coneflower Solar Project in Lyon County, Minnesota

Issues Addressed: These comments and recommendations address the completeness of the site permit application, the need for an advisory task force, and other issues related to this matter.

Documents Attached:

- (1) Project Overview Map (MISO Scenario)
- (2) Project Overview Map (Garvin Scenario)
- (3) Table 1. Application Completeness Requirements
- (4) Table 2. Draft Permitting and Environmental Review Schedule

Additional documents and information can be found on:

- eDockets via <https://www.edockets.state.mn.us/EFiling/search.jsp> (24-215) and;
- The Department of Commerce's website via <http://mn.gov/commerce/energyfacilities>.

This document can be made available in alternative formats (i.e., large print or audio) by calling 651-539-1529 (voice).

Introduction and Background

On August 19, 2024, Coneflower Energy, LLC (Coneflower Solar) filed a site permit application to construct and operate the Coneflower Solar project, an up to 235 megawatt (MW) alternating current photovoltaic solar energy generating facility and associated infrastructure in Custer Township in Lyon County, Minnesota.¹ On August 28, 2024, the Minnesota Public Utilities Commission (Commission) issued a notice soliciting comments on the completeness of the site permit application, the need for an

¹ Coneflower Solar Project, Application to the Minnesota Public Utilities Commission for a Site Permit for a Large Electric Generating Facility, August 19th, 2024, eDockets Numbers [20248-209609-1](#) (through -10), [20248-209610-01](#) (through -08).

advisory task force, and any other issues related to this matter.²

Project Purpose

Coneflower Solar indicates that the project will assist the State of Minnesota in meeting its renewable energy objectives,³ diversify electricity sources, meet anticipated growth in electricity demand, and meet consumers' growing demand for renewable energy.⁴ Coneflower Solar is working to secure a power purchase agreement with wholesale customers (e.g., Minnesota utilities and cooperatives) or commercial and industrial customers to sell the electric power generated by the project.

Project Description

Coneflower Solar proposes to construct and operate an up to 235 MW solar farm in Custer Township in Lyon County, Minnesota. The project is proposed with two possible off-take scenarios: (1) it can connect through the adjacent existing Lyon County to Lake Yankton 115kV HVTL (the MISO Scenario) or (2) through Xcel Energy's proposed Garvin Substation, which is within ½-mile from the project (the Garvin Scenario).⁵

In both scenarios, the project will occupy approximately 2,299 acres, of which 1,723 acres will be developed for the project, north of the city of Garvin and east of the city of Balaton (see Project Overview Maps). There are minor differences in the locations and acreages of the proposed project facilities within the 1,732 acre development area between the MISO Scenario and Garvin Scenario due to the different interconnection options.⁶

The project will use photovoltaic solar panels mounted on single axis tracking systems in both scenarios, with the Garvin Scenario having slightly more panel coverage (1,611.0 acres) compared to the MISO Scenario (1,606.3 acres).⁷ In both scenarios, underground collection cables will gather and send the electric power generated by the solar panels to a project substation.

In the MISO Scenario, the project substation is located in the northern portion of the project area from which the electricity will be transmitted to a proposed utility owned switchyard. The MISO Scenario switchyard will interconnect with the electrical grid through the existing Lyon County to Lake Yankton 115kV HVTL that runs adjacent to the northern perimeter of the project via a short (<500 feet) 115 kV transmission line.⁸

In the Garvin Scenario, the project substation is located in the eastern portion of the area from which the electricity will travel on a short (<1mile) 345 kV gen-tie line to Xcel's proposed Garvin Substation, where it will interconnect with the electrical grid.⁹

² Notice of Comment Period on Application Completeness, August 28, 2024, eDockets Number 20248-209842-01.

³ Minnesota Statute 216B.1691.

⁴ Site Permit Application, Section 1.3

⁵ Site Permit Application, Section 1.2

⁶ Site Permit Application, Section 4.3.2

⁷ Site Permit Application, Section 4.3.2

⁸ Site Permit Application, Section 4.1.10

⁹ Site Permit Application, Section 4.1.10

Coneflower Solar indicates that a generator interconnection for the project has been requested with the Midcontinent Independent System Operator.¹⁰ Coneflower Solar expects to sign a generator interconnection agreement in summer 2025. If Coneflower Solar proceeds with the Garvin Scenario, they will need a surplus interconnection system agreement with Xcel Energy to interconnect to the proposed Garvin Substation as well as a route permit for the 345 kV gen-tie transmission line from the Commission. Both would occur after the Commission's approval of Xcel Energy's proposed Garvin Substation in a separate proceeding (Docket TL-22-123).¹¹ For both the MISO Scenario and the Garvin Scenario, construction is anticipated to begin in 2026 with completion and operation anticipated in 2027.¹²

Regulatory Process and Procedures

In Minnesota, no person may construct a large electric power generating plant without a site permit from the Commission.¹³ A large electric power generating plant is defined as a facility capable of operating at a capacity of 50 MW or more.¹⁴ The Coneflower Solar project will be capable of producing up to 235 MW and therefore requires a site permit from the Commission. Because the project is powered by solar energy, the site permit application qualifies for Commission review under the alternative permitting process described in Minnesota Statute 216E.04, Subd. 2.

As Coneflower Solar is an independent power producer, a certificate of need (CN) is not required for the project. The project is exempt under Minnesota Statute 216B.243, subd. 8(a)(8), which provides that a CN is not required for a "solar energy generating system, as defined in section 216E.01, subdivision 9a, for which a site permit application is submitted by an independent power producer under chapter 216E."¹⁵

Site Permit Application Acceptance

Site permit applications for large electric power generating plants must provide information about the applicant, a description of the project, and discussion of potential human and environmental impacts and mitigation measures.¹⁶ Review under the alternative permitting process does not require an applicant to propose alternative sites in their permit application; however, if alternative sites were evaluated and rejected, the application must describe these sites and reasons for rejecting them.¹⁷

¹⁰ Site Permit Application, Section 4.2

¹¹ Site Permit Application, Section 4.1.10 and 4.2

¹² Site Permit Application, Section 2.4

¹³ Minnesota Statute 216E.03

¹⁴ Minnesota Statute 216E.01

¹⁵ Minnesota Statute 216B.243, Subd. 8(a)(8)

¹⁶ Minnesota Rules 7850.1900 and 7850.3100

¹⁷ Minnesota Rule 7850.3100

With an application, the Commission may accept it as complete, reject it and advise the applicant of the deficiencies, or accept it as complete upon filing of supplemental information.¹⁸ The environmental review and permitting process begins when the Commission determines that a permit application is complete; the Commission has six months (or nine months, with just cause) from the date of this determination to reach a permit decision.¹⁹

Public Advisor

Upon acceptance of a route permit application, the Commission must designate a public advisor.²⁰ The public advisor answers questions about the permitting process but cannot provide legal advice or act as an advocate for any person.

Environmental Review

Site permit applications are subject to environmental review conducted by Department of Commerce, Energy Environmental Review and Analysis (EERA) staff. Projects proceeding under the alternative permitting process require the preparation of an environmental assessment (EA).²¹ An EA is a document which contains an overview of the resources affected by a proposed project and describes the potential human and environmental impacts and possible mitigation measures. An EA is the only state environmental review document required for site permit applications reviewed under the alternative permitting process.

EERA conducts public information and scoping meetings during a public comment period to inform the content of the EA.²² The Commissioner of the Department of Commerce determines the scope of the EA,²³ and may include alternative sites suggested during the scoping process if they would aid the Commission in making a permit decision.

Public Hearing

Site permit applications under the alternative permitting process require that a public hearing be held in the project area after completion and release of the EA.²⁴ The hearing is typically presided over by an administrative law judge (ALJ) from the Office of Administrative Hearings. The Commission may request that the ALJ solely provide a summary of public testimony. Alternately, the Commission may request that the ALJ provide a full report with findings of fact, conclusions of law, and recommendations regarding the project.

Advisory Task Force

The Commission may appoint an advisory task force to aid the environmental review process.²⁵ An advisory task force must include representatives of local governmental units in the project area.²⁶ A task

¹⁸ Minnesota Rule 7850.3200

¹⁹ Minnesota Statute 216E.04, Subd. 7.

²⁰ Minnesota Rule 7850.340

²¹ Minnesota Rule 7850.3700

²² Minnesota Rule 7850.3700, subp. 2.

²³ Minnesota Rule 7850.3700, subp. 3.

²⁴ Minnesota Rule 7850.3800

²⁵ Minnesota Statute 216E.08

²⁶ Minnesota Statute 216E.08

force would assist EERA staff with identifying additional sites or impacts and mitigation measures to be evaluated in the EA. A task force expires upon issuance of the EA scoping decision.²⁷

The Commission is not required to appoint an advisory task force for every project. If the Commission does not appoint a task force, citizens may request that one be appointed.²⁸ If such a request is made, the Commission must make this determination at its next regularly scheduled meeting. The decision whether to appoint an advisory task force does not need to be made at the time of application acceptance; however, it should be made as soon as practicable to ensure it can complete its charge prior to issuance of the EA scoping decision.

EERA Staff Analysis and Comments

EERA staff provides the following analysis and comments in response to the Commission's notice requesting comments on completeness and other issues related to Coneflower Solar's site permit application.

Application Completeness

EERA staff conferred with Coneflower Solar about the proposed project and reviewed a draft site permit application. EERA staff believe that staff comments on the draft application have largely been addressed in the site permit application submitted to the Commission. Staff evaluated the site permit application against the application completeness requirements of Minnesota Rule 7850.3100, which refers to 7850.1900 with exception for proposing alternative sites (see Table 1). Staff finds that the application contains appropriate and complete information with respect to these requirements.

This said, EERA staff provides two observations regarding the application. First, staff notes that the draft site permit application reviewed by EERA included a Phase I cultural resources survey. This survey is not included in the site permit application filed with the Commission. Coneflower Solar indicates that the survey is being reviewed by the State Historic Preservation Office (SHPO).²⁹ EERA staff recommends that Coneflower Solar provide this survey in an appropriate form (e.g., public, redacted, non-public) following SHPO's review. Second, staff believes that the estimated project schedule provided in the application, which is stated to be applicable for both scenarios, is only accurate for the MISO Scenario.³⁰ The Garvin Scenario will require a route permit from the Commission; given the time required for the permitting process, EERA staff believes that the MISO Scenario and Garvin Scenario have substantive differences in their anticipated project schedules.

Vegetation Management Plan

Coneflower Solar has provided a draft vegetation management plan (VMP) with its application (Appendix E). The VMP provides measurable and clearly defined long-term and short-term management objectives for the site and is consistent with the Vegetation Management Plan Working Group's Guidance for Developing a Vegetation Establishment and Management Plan for Solar Facilities. Coneflower Solar intends to establish short-statured native vegetation and fescue mix throughout the array area, short-statured native vegetation along the inside of the fence perimeter, mixed height native vegetation outside of the fenced arrays, and native wetland vegetation for the stormwater and wetland

²⁷ Minnesota Rule 7850.3600

²⁸ Minnesota Rule 7850.3600

²⁹ Site Permit Application, Section 5.4.2.

³⁰ Site Permit Application, Section 2.4

areas. Native plantings will follow the Vegetation Management Guidance from the Minnesota Department of Natural Resources (DNR).

EERA staff noted some concern that the original proposed array seed mix, which covers roughly 70% of the project area, consisted of mostly non-native clovers and would provide little habitat benefit to pollinators and other wildlife. This was discussed with Coneflower Solar, and they have adjusted the array seed mix to include a diverse mix of short-statured native vegetation that provides habitat benefits. The VMP Working Group will continue to work with Coneflower Solar to ensure seed mixes will provide suitable habitat while meeting the operation and maintenance needs of the facility.

Advisory Task Force

EERA staff analyzed the merits of establishing an advisory task force for the Coneflower Solar project. Staff concludes that a task force is not warranted at this time.

In analyzing the need for an advisory task force for the project, EERA staff considered four characteristics: project size, project complexity, known or anticipated controversy, and sensitive resources.

- **Project Size.** The project will utilize a relatively large area of land – approximately 2,299 acres (1,723 acres to be developed). However, the concerns associated with such a large acreage are muted, to a great extent, by the fact that land for the project is privately-owned land under contract or owned by Coneflower Solar and/or its affiliates (with the exception of public road right-of-way). Coneflower Solar has secured all necessary land rights for construction and operation of the project. Thus, this project-size factor weighs against a task force.
- **Project Complexity.** With respect to energy production and land use, the project is not complex. Though large solar electric projects are fairly new in Minnesota, they are relatively straightforward – solar panels are arranged to gather sunlight and create electric energy, which is then transferred to the electric transmission grid. Land use in the project area is agricultural and the topography is relatively flat. There are no special construction techniques or operational features that make the project complex. This project-complexity factor weighs against a task force.
- **Known or Anticipated Controversy.** To date, EERA staff has received no comments concerning the project, and there are currently no public comments in the record. Coneflower Solar has conducted outreach with state and federal agencies as well as Minnesota tribal nations and local governments in the project area.³¹ The project has been planned on land under contract or owned by Coneflower Solar and/or its affiliates. As a whole, EERA staff does not anticipate controversy with the project.
- **Sensitive Natural Resources.** There are few sensitive natural resources in the project area.³² The project area is located on agricultural land.³³ The DNR recommends avoidance of MBS Sites of Biodiversity Significance ranked High or Outstanding, none of which are present in the project

³¹ Site Permit Application, Section 6.1

³² Site Permit Application, Section 5.5.8

³³ Site Permit Application, Section 5.2.9

area.³⁴ The DNR also recommends avoidance of rare native plant communities; the closest native plant community is adjacent to the development area.³⁵

There is one federally endangered species, the northern long-eared bat, one federally proposed endangered species, the tricolored bat, and one federal candidate species, the monarch butterfly, potentially present within the project area. Impacts to these sensitive natural resources are anticipated to be minimal. The DNR notes that there are no species of concern near the project area and indicates the project will not affect any known occurrences of rare features.³⁶ On whole, potential impacts to sensitive natural resources weigh against a task force.

Based on the assessment of the factors above, EERA staff believe that an advisory task force is not warranted for the project at this time.

Other Issues Related to This Matter

EERA staff recommends that the Commission request a full ALJ report for the project's public hearing. EERA staff believe that a full ALJ report with recommendations provides an unbiased, efficient, and transparent method to voice and resolve any issues that may emerge as the record is developed. Requiring a full ALJ report reduces the burden on staff and helps to ensure that the Commission has a robust record on which to base its decision. Additionally, a full ALJ report does not significantly lengthen the site permitting process. EERA staff has provided a draft schedule for the Coneflower Solar permitting process, which includes a comparison of potential hearing work products and schedules – i.e., a summary of public testimony versus a full ALJ report with findings, conclusions, and recommendations (see Table 2).

EERA Staff Recommendations

EERA staff recommends that:

- The Commission accept Coneflower Solar's site permit application as substantially complete.
- Coneflower Solar provide a Phase I cultural resources survey for the project.
- Coneflower Solar provide estimated project schedules for both the MISO Scenario and the Garvin Scenario that take into account anticipated differences in these scenarios – e.g., the permitting schedule for the Garvin Substation; the need for a route permit to interconnect with the Garvin Substation.
- The Commission not appoint an advisory task force for the project.
- The Commission request a full ALJ report with findings, conclusions, and recommendations for the project's public hearing.

³⁴ Site Permit Application, Section 5.5.9

³⁵ Site Permit Application, Section 5.5.10

³⁶ Site Permit Application, Section 5.5.8

Table 1. Application Completeness Requirements

Minnesota Rule 7850.1900, Subpart 1	Location in Site Permit Application	EERA Staff Comments
A. a statement of proposed ownership of the facility at the time of filing the application and after commercial operation;	1.1.1	Satisfactory. Coneflower Energy LLC is the owner of the project.
B. the precise name of any person or organization to be initially named as permittee or permittees and the name of any other person to whom the permit may be transferred if transfer of the permit is contemplated;	1.1.2	Satisfactory. Coneflower Energy LLC will be the permittee.
C. at least two proposed sites for the proposed large electric power generating plant and identification of the applicant's preferred site and the reasons for the preference;	Not applicable.	The project can use the alternative permitting process of Minnesota Statute 216E.04, which does not require providing this information via Minnesota Rule 7850.3100.
D. a description of the proposed large electric power generating plant and all associated facilities, including the size and type of the facility;	2.1 and 2.2	Satisfactory.
E. the environmental information required under subpart 3;	See Minnesota Rule 7850.1900, subpart 3 below.	
F. the names of the owners of the property for each proposed site;	Appendix B	Satisfactory. Coneflower Energy LLC, an indirect wholly owned subsidiary of Apex Clean Energy Holdings LLC, has obtained leases or purchase options for land which is adequate to support a 235 MW solar project.
G. the engineering and operational design for the large electric power generating plant at each of the proposed sites;	4.1	Satisfactory.

Minnesota Rule 7850.1900, Subpart 1	Location in Site Permit Application	EERA Staff Comments
H. a cost analysis of the large electric power generating plant at each proposed site, including the costs of constructing and operating the facility that are dependent on design and site;	2.3	Satisfactory.
I. an engineering analysis of each of the proposed sites, including how each site could accommodate expansion of generating capacity in the future;	2.2 and 3.2	Satisfactory.
J. identification of transportation, pipeline, and electrical transmission systems that will be required to construct, maintain, and operate the facility;	4.1.2, 4.1.4, 4.1.6, 4.1.7, 4.1.10, and 4.2	Satisfactory.
K. a listing and brief description of federal, state, and local permits that may be required for the project at each proposed site; and	2.5	Satisfactory.
L. a copy of the certificate of need for the project from the Commission or documentation that an application for a certificate of need has been submitted or is not required;	2.5.2	Satisfactory. A certificate of need is not required for the project.

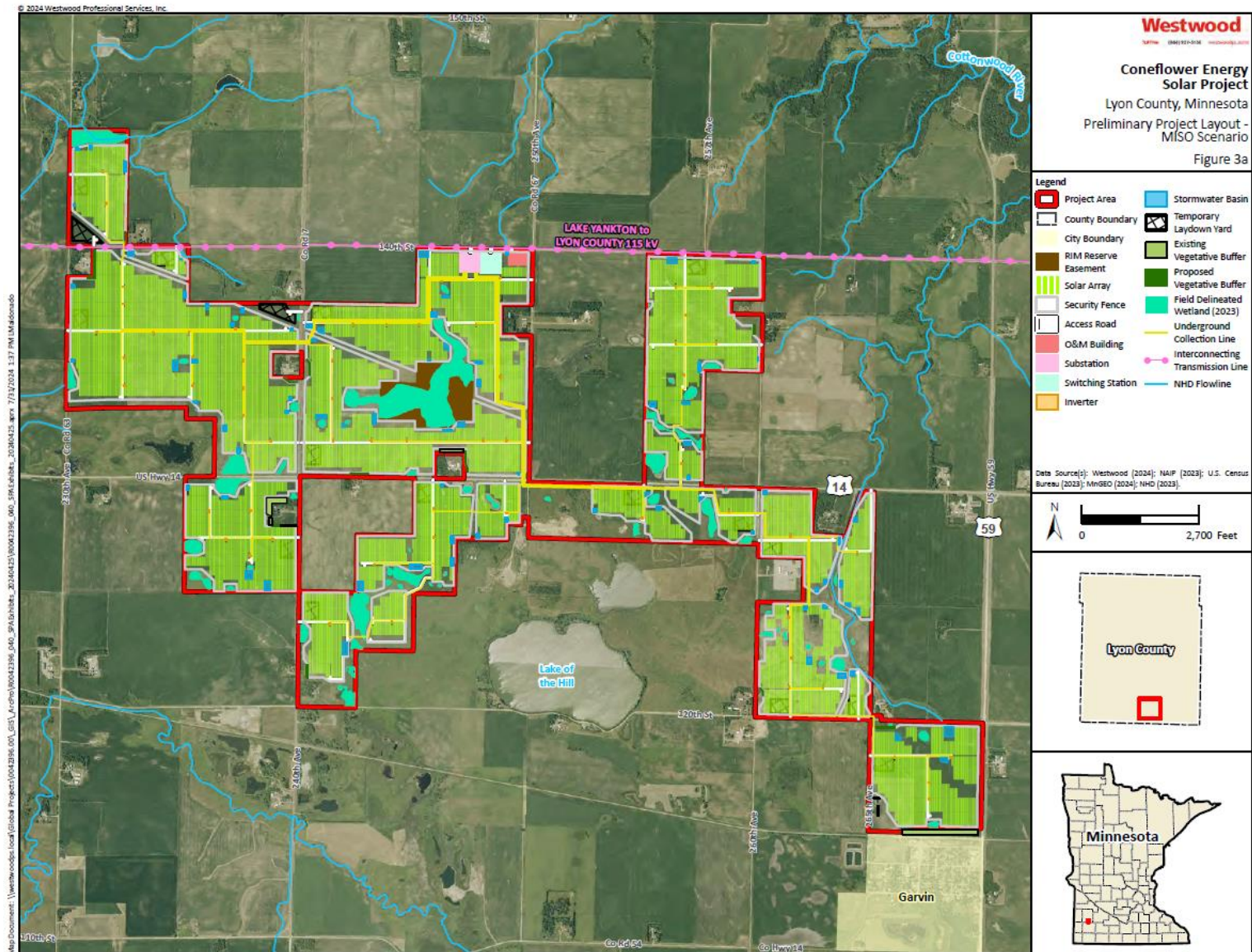
Minnesota Rule 7850.1900, Subpart 3	Location in Site Permit Application	EERA Staff Comments
A. a description of the environmental setting for each site or route;	5.1	Satisfactory.

Minnesota Rule 7850.1900, Subpart 3	Location in Site Permit Application	EERA Staff Comments
B. a description of the effects of construction and operation of the facility on human settlement, including, but not limited to, public health and safety, displacement, noise, aesthetics, socioeconomic impacts, cultural values, recreation, and public services;	5.2	Satisfactory.
C. a description of the effects of the facility on land-based economies, including, but not limited to, agriculture, forestry, tourism, and mining;	5.3	Satisfactory.
D. a description of the effects of the facility on archaeological and historic resources;	5.4	Satisfactory.
E. a description of the effects of the facility on the natural environment, including effects on air and water quality resources and flora and fauna;	5.5	Satisfactory.
F. a description of the effects of the facility on rare and unique natural resources;	5.5.8	Satisfactory.
G. identification of human and natural environmental effects that cannot be avoided if the facility is approved at a specific site or route; and	5.6, 5.7, and 5.8	Satisfactory.
H. a description of measures that might be implemented to mitigate the potential human and environmental impacts identified in items A to G and the estimated costs of such mitigative measures.	5.0	Satisfactory. Generally discussed throughout the section by resource.

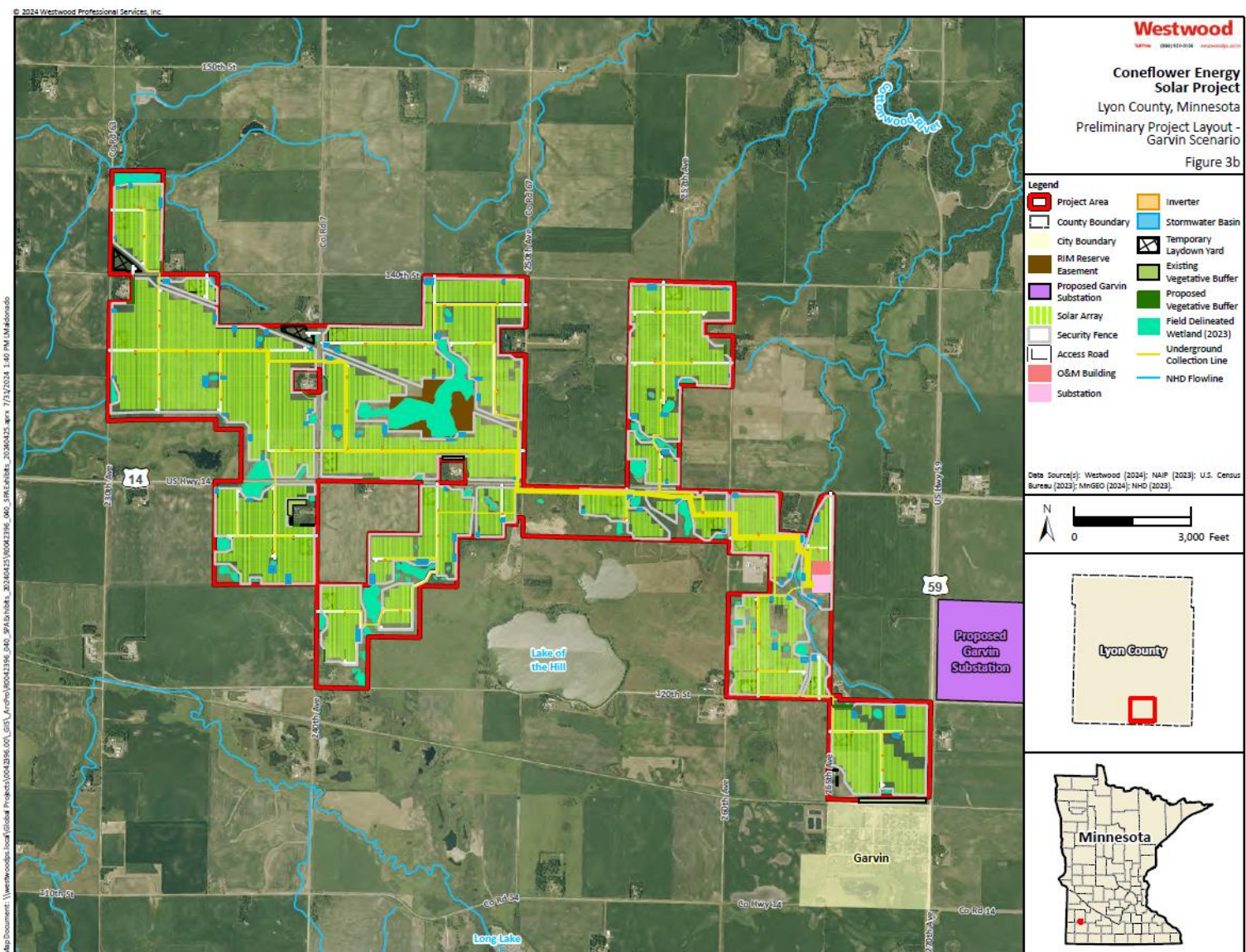
Table 2. Draft Permitting and Environmental Review Schedule

Permitting Day	Process Step (Summary of Public Testimony)	Process Step (Full ALJ Report)
0	Site Permit Application Filed	
	Comment Period on Application Completeness	
	Reply Comment Period	
	Commission Considers Application Completeness	
1	Application Acceptance Order	
5	Public Information and Scoping Meeting Notice	
30	Public Information and Scoping Meeting	
60	Scoping Decision Issued	
150	EA Issued Notice of EA Availability and Public Hearing	
170	Public Hearing	
180	Public Hearing Comment Period Closes	
190	Applicant Responses to Hearing Comments	
200	Applicant Proposes Findings	
210	EERA Responses to Comments on EA; Technical Analysis; Replies to Applicant Proposed Findings	
210	ALJ Submits Summary of Public Testimony	NA
230	Commission Prepares Findings and Proposed Site Permit	ALJ Submits Full Report
255	NA	Exceptions to ALJ Report
260	Commission Considers Site Permit Issuance	NA
270	NA	Commission Prepares Proposed Site Permit
290	NA	Commission Considers Site Permit Issuance

Project Overview Map – MISO Scenario



Project Overview Map – Garvin Scenario



September 24, 2024

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

RE: EERA Supplemental Comments and Recommendations on Application Completeness
Coneflower Solar Project
Docket No. IP-7132/GS-24-215

Dear Mr. Seuffert,

Department of Commerce, Energy Environmental Review and Analysis (EERA) staff provides these supplemental comments and recommendations in the following matter:

In the Matter of the Application of Coneflower Energy LLC for a Site Permit for the up to 235 MW Coneflower Solar Project in Lyon County, Minnesota

On August 19, 2024, Coneflower Energy, LLC (Coneflower Solar) filed a site permit application to construct and operate the Coneflower Solar project, an up to 235 megawatt (MW) solar farm in Lyon County, Minnesota. On August 28, 2024, the Minnesota Public Utilities Commission (Commission) issued a notice soliciting comments on the completeness of the application and related procedural matters.

On September 11, 2024, EERA staff filed comments on application completeness; EERA staff recommended that the Commission accept Coneflower Solar's site permit application as substantially complete but requested Coneflower Solar provide: 1) the Phase I Cultural Resources Survey for the project and 2) separate estimated project schedules for both the MISO and Garvin Scenarios that take into account the anticipated differences in these scenarios.¹ On September 18, 2024, Coneflower Solar filed reply comments addressing EERA staff's request to provide the Phase I Cultural Resources Survey and scenario-specific estimated project schedules.²

EERA staff has reviewed Coneflower Solar's reply comments. Staff finds that the reply comments provide: 1) the requested Phase I Cultural Resources Survey in both public and non-public format and 2) two estimated project schedules for the MISO and Garvin Scenarios that highlight the additional route permitting steps that the Garvin Scenario would require.

¹ EERA, Comments on Application Completeness, September 11, 2024, eDockets Number [20249-210104-01](#).

² Coneflower Solar Project, Completeness Reply Comments, September 18, 2024, eDockets Number [20249-210296-01](#).

EERA staff finds that Coneflower Solar's reply comments adequately address EERA's request for the Phase I Cultural Resources Survey and estimated project schedules for individual scenarios. Staff recommends that the Commission find Coneflower Solar's site permit application to be complete.

Sincerely,

A handwritten signature in black ink, appearing to read "Lauren Agnew". The signature is fluid and cursive, with the first name "Lauren" being more prominent than the last name "Agnew".

Lauren Agnew
Environmental Review Manager

CERTIFICATE OF SERVICE

I, Hannah Olson, hereby certify that I have this day, served a true and correct copy of the following document to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States mail at St. Paul, Minnesota.

Minnesota Public Utilities Commission ORDER

Docket Number IP-7132/GS-24-215
Dated this 15th day of October, 2024

/s/ Hannah Olson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Brie	Anderson	brie.anderson@apexcleanenergy.com	Apex Clean Energy, Inc.	8665 Hudson Boulevard North, Suite 200 Lake Elmo, MN 55402	Electronic Service	No	OFF_SL_24-215_GS-24-215
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	60 S 6th St Ste 1500 Minneapolis, MN 55402-4400	Electronic Service	No	OFF_SL_24-215_GS-24-215
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_24-215_GS-24-215
Ryan	Cox	rcox@fredlaw.com	Fredrikson & Byron, P.A.	60 S Sixth St Ste 1500 Minneapolis, MN 55402-4400	Electronic Service	No	OFF_SL_24-215_GS-24-215
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_24-215_GS-24-215
Richard	Kolodziejski	rkolodziejski@ncsrcc.org	North Central States Regional Council of Carpenters	700 Olive St St. Paul, MN 55130	Electronic Service	No	OFF_SL_24-215_GS-24-215
Stacy	Kotch Egstad	Stacy.Kotch@state.mn.us	MINNESOTA DEPARTMENT OF TRANSPORTATION	395 John Ireland Blvd. St. Paul, MN 55155	Electronic Service	No	OFF_SL_24-215_GS-24-215
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_24-215_GS-24-215
Nathaniel	Runke	nrunke@local49.org	International Union of Operating Engineers Local 49	611 28th St. NW Rochester, MN 55901	Electronic Service	No	OFF_SL_24-215_GS-24-215
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_24-215_GS-24-215

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Sean	Stocker	sean.stocker@apexcleanenergy.com	Apex Clean Energy, Inc.	8665 Hudson Boulevard North Suite 200 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_24-215_GS-24-215
Garrick	Valverde	garrick.valverde@apexcleanenergy.com	Apex Clean Energy	8665 Hudson Boulevard North Suite 200 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_24-215_GS-24-215