

RE: PUC EIP Supplemental Comments on Application Completeness

Blue Lake Storage Project

PUC Docket No. E002/ESS-25-214

In its July 11, 2025, comments Minnesota Public Utilities Commission Energy Infrastructure Permitting (EIP) staff recommended that the Commission find Xcel Energy's application for the Blue Lake Energy Storage Project substantially complete pending additional information on construction and operating costs.¹

Xcel Energy filed reply comments on application completeness on July 18, 2025.² Xcel Energy's reply comments re-iterated that it considers the cost information to be protected information and appropriately filed that information as a trade secret in Appendix K of the application. The reply comments cited to other Xcel Energy site permit applications that did not provide public cost information. While noting its position that public cost information is not required for applications to be considered complete, Xcel Energy did provide a high level estimate of capital and operating costs.

Although Xcel Energy has characterized project costs as protected information in other applications, EIP staff notes that applications for other energy storage systems have provided public cost information in various formats.³ EIP staff also notes that although public cost information was not provided in Xcel Energy's applications for the Sherco Solar Project or the Sherco 3 Solar Project, Department of Commerce staff⁴ requested information from the company and provided that information in the environmental assessments prepared for those projects.⁵ EIP staff will request similar information for the Environmental Assessment for the proposed Blue Lake Energy Storage Project.

¹ Commission EIP staff, Staff Comments on Application Completeness, July 11, 2025. eDocket ID: [20257-220868-01](#)

² Xcel Energy, July 18, 2025, Completeness Reply Comments, eDocket ID: [20257-221145-01](#)

³ See, e.g., Crane Energy Storage, LLC and Sandhill Energy Storage, LLC, *Joint Site Permits Application to the Minnesota Public Utilities Commission for Crane and Sandhill Energy Storage Projects*, (Dockets IP-7148/ESS-24-406, IP-7149/ESS-24-407), March 5, 2025, eDocket ID: [20253-216062-02](#), at p. 16; North Star Energy Storage, LLC, February 28, 2025, (Docket IP-7155/ESS-25-123) *Site Permit Application to the Minnesota Public Utilities Commission for the North Star Battery Energy Storage System Project*, eDocket ID: [20252-215915-02](#), at p.14; Midwater BESS, LLC, November 19, 2025, (Dockets IP-7138/ESS-24-294, IP-7138/TL-24-295)-*Midwater Energy Storage Project: Joint Application to the Minnesota Public Utilities Commission for a Site Permit and a Route Permit* eDocket ID: [202411-212161-01](#), at pp. 28-29; Snowshoe BESS, LLC, *Application to the Minnesota Public Utilities Commission for a Site Permit*, October 7, 2024, (Docket IP-7138/ESS-24-279), eDocket ID: [202410-210785-02](#), at pp. 16-17.

⁴ On July 1, 2025, Department of Commerce Energy Environmental Review and Analysis (DOC EERA) unit staff moved to the Minnesota Public Utilities Commission Energy Infrastructure Permitting (PUC EIP) unit as directed by state law (Laws of Minn. 2024, ch.126, art. 7).

⁵ Department of Commerce, *Sherco Solar Project Environmental Assessment*, March 1, 2022, eDocket ID: [20223-183816-05](#), at p. 33; Department of Commerce, *Environmental Assessment: Sherco Solar 3 Project*, April 22, 2024, eDocket ID: [20244-205757-01](#), at pp. 22-23.

EIP staff appreciates the cost information provided by Xcel Energy in its reply comments recommends the Commission find the application substantially complete, which will allow the environmental review and permitting process to begin.

Sincerely,

A handwritten signature in black ink that reads "Suzanne Lamb Steinhauer". The signature is written in a cursive style with a large initial 'S' and 'L'.

Suzanne Lamb Steinhauer
Environmental Review Project Manager