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March 20, 2026

VIA E-FILING

Sasha Bergman
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

**RE: In the Matter of the Application of Summit Lake Solar, LLC for an up to 200 MW
Summit Lake Solar Energy Generating System Site Permit for the Summit Lake
Solar Project in Nobles County, Minnesota**

**MPUC Docket Number IP-7150/GS-25-89
CAH Docket Number: 21-2500-41031**

**In the Matter of the Application of Summit Lake Storage, LLC for an up to 200
MW / 800- MWh Battery Energy Storage System Site Permit for the Summit Lake
Storage Project in Nobles County, Minnesota**

**MPUC Docket Number IP-7153/ESS-25-88
CAH Docket Number: 21-2500-41031**

Dear Ms. Bergman:

Enclosed for filing on behalf of Summit Lake Solar, LLC and Summit Lake Storage, LLC in the above-captioned matter, please find the Direct Testimony of Alia Mohammad, including Schedules A-C.

The documents referenced above have been electronically filed today through www.edockets.state.mn.us. A copy of this filing is also being served upon the persons on the Official Service Lists of record.

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

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Sincerely,

FREDRIKSON & BYRON, P.A.

/s/ Jeremy P. Duehr

Jeremy P. Duehr

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JPD

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

In the Matter of the Application of Summit Lake Solar, LLC for an up to 200 MW Summit Lake Solar Energy Generating System Site Permit for the Summit Lake Solar Project in Nobles County, Minnesota

MPUC Docket Number IP-7153/GS-25-89

In the Matter of the Application of Summit Lake Storage, LLC for an up to 200 MW / 800-MWh Battery Energy Storage System Site Permit for the Summit Lake Storage Project in Nobles County, Minnesota

MPUC Docket Number IP-7153/ESS-25-88

CAH Docket No. 21-2500-41031

**DIRECT TESTIMONY OF ALIA MOHAMMAD
ON BEHALF OF
Summit Lake Solar, LLC
and
Summit Lake Storage, LLC**

March 20, 2026

1 I. INTRODUCTION AND QUALIFICATIONS

2

3 **Q. Please state your name, employer, and business address.**

4 A. My name is Alia Mohammad. I am Senior Permitting Specialist at Geronimo Power,
5 LLC (Geronimo Power) (formally known as National Grid Renewables
6 Development, LLC). My business address is 8400 Normandale Lake Boulevard,
7 Suite 1200, Bloomington, MN 55437.

8

9 **Q. Please briefly describe your educational background and professional**
10 **experience.**

11 A. I graduated from the State University of New York College of Environmental
12 Science and Forestry with a Bachelor of Science degree in Environmental Science.
13 I have worked with Geronimo Power since April 2023. I began as a Permitting
14 Associate, where I supported utility-scale renewable energy projects by assisting
15 with project siting efforts and supporting local and state permitting processes. I
16 later advanced to Permitting Specialist and Senior Permitting Specialist roles,
17 where I continued to support the permitting and environmental review of
18 utility-scale solar and battery energy storage projects, including coordination with
19 internal teams, consultants, and regulatory agencies.

20

21 **Q. For whom are you testifying?**

22 A. I am testifying on behalf of Summit Lake Solar, LLC (Summit Lake Solar) and
23 Summit Lake Storage, LLC (Summit Lake Storage) (collectively, the Applicants).
24 The Applicants are each wholly owned subsidiaries of Geronimo Power. Geronimo
25 Power is a utility-scale renewable energy development company headquartered in
26 Bloomington, Minnesota that has developed multiple operating solar, wind, and
27 energy storage projects throughout the United States. Over 2,900 megawatts
28 (MW) of solar, wind, or energy storage projects developed by Geronimo Power are
29 either under construction or operational. Geronimo Power has a multi-gigawatt
30 development pipeline of solar, wind, and energy storage projects in various stages
31 of development throughout the United States and over 1,900 MW of solar

1 development under construction or completed. As the authorized agent of the
2 Applicants, Geronimo Power will manage ongoing development and construction
3 activities for the Summit Lake Solar Project (Solar Facility) proposed by Summit
4 Lake Solar and the Summit Lake Battery Storage Project (BESS) proposed by
5 Summit Lake Storage. The Solar Facility and BESS are collectively referred to in
6 my Direct Testimony as the Project.

7
8 **Q. What is your role with respect to the Project?**

9 A. My role is to lead project development and the Minnesota Public Utilities
10 Commission (Commission) permitting process – working with the Summit Lake
11 Solar and Summit Lake Storage teams and external consultants to ensure the
12 Project design and the application meets Minnesota rules and regulations. This
13 includes agency coordination, supporting studies, and Project design.

14 15 **II. PURPOSE OF DIRECT TESTIMONY**

16
17 **Q. What is the purpose of your Direct Testimony?**

18 A. On February 21, 2025, the Summit Lake Solar filed a Joint Application for Site
19 Permits for the Solar Facility and BESS (Application). Subsequently, On October
20 14, 2025, in light of public comments and feedback received from local residents
21 and local governments, Applicants requested the site permit proceedings pause
22 while it considered those comments in a potential re-design of the Project.

23
24 On December 18, 2025, Applicants submitted a Joint Site Permits Application
25 Amendment to the Minnesota Public Utilities Commission for the Summit Lake
26 Solar Energy Generating System and Battery Energy Storage System (Application
27 Amendment). As part of the Application Amendment, Summit Lake Solar
28 requested the Commission change the name of the applicant for the BESS to
29 Summit Lake Storage.

1 The purpose of my Direct Testimony is to: (1) provide an overview of the Project;
2 (2) provide updates on the Project; (3) discuss the local employment and economic
3 benefits; (4) discuss the coordination between Summit Lake Solar and the State
4 Historic Preservation Office (SHPO); (5) provide a brief discussion of safety issues
5 related to the BESS; and (6) provide comments on the Environmental Assessment
6 (EA) and Draft Site Permits for the Solar Facility (Solar DSP) and the BESS (BESS
7 DSP).

8
9 **Q. What schedules are attached to your Direct Testimony?**

10 A. The following schedules are attached to my Direct Testimony:

- 11 • **SCHEDULE A:** Statement of Qualifications
- 12 • **SCHEDULE B:** Landscape Plan
- 13 • **SCHEDULE C:** SHPO Consultation Letter

14
15 **III. PROJECT OVERVIEW**

16
17 **Q. Please provide a summary of the Project, including the proposed location**
18 **and proposed site.**

19 The Project consists of the Solar Facility and the BESS. The Solar Facility is
20 proposed as a solar energy conversion facility with an up to 200-MW alternating
21 current (AC) nameplate capacity. The BESS will consist of a stand-alone structure
22 with an up to 200 MW / 800-megawatt hour (MWh) nameplate capacity and
23 ancillary support infrastructure. Both the Solar Facility and the BESS will share a
24 new substation to be constructed as a part of the Project.

25
26 The Project will be located in Summit Lake and Elk Townships, Nobles County,
27 Minnesota. The Project will interconnect to the existing Nobles Substation via a
28 new, approximately 992-foot long, 345 kilovolt (kV) generation tie transmission line
29 to be constructed as part of the Project.
30

1 **Q. Why did Summit Lake Solar choose the Project Area as presented in the**
2 **Application to build the Project?**

3 A. Summit Lake Solar first identified areas of Minnesota with adequate solar
4 resources to host a solar project, then identified potential locations for a point of
5 interconnection with available capacity. Summit Lake Solar identified the proposed
6 Project location after determining the Nobles Substation as a point of
7 interconnection with available capacity to interconnect the Project to the
8 transmission system. From there, Summit Lake Solar reviewed real estate options
9 within approximately five miles of the Nobles Substation. This distance was
10 selected to account for transmission interconnect efficiency, which is essential to
11 successful development of the Project. Summit Lake Solar determined there was
12 significant landowner interest in participating in the Project and obtained a
13 combination of lease agreements and purchase options with the landowners for
14 the Project. As part of this iterative land acquisition and Project development
15 process, Summit Lake Solar also considered land that may be unavailable or
16 restricted, environmental impacts, construction restrictions such as slopes, soils,
17 and potential recognized environmental concerns, and other landowner
18 preferences. This process included a discussion with landowners regarding
19 potential locations of panels, fences, and access roads.

20 21 **IV. PROJECT UPDATES**

22 **Q. Has the anticipated schedule for the construction of the Project changed**
23 **from what was contemplated in the Application?**

24 A. Yes. The Application noted that construction of the Project was expected to
25 commence in the first quarter of 2026 with the Project expected to be operational
26 by the fourth quarter of 2028. The Applicants currently anticipate construction
27 commencing in the first quarter of 2027 and achieving commercial operation by
28 the fourth quarter of 2028.

29 **Q. Are there any design changes related to the Project?**

30 A. Yes. As outlined in the Application Amendment, the Applicants have made several
31 changes to the Project design. All of those changes were evaluated in the EA.

1 **Q. What are those changes?**

2 A. Applicants have made changes to the Project design, including in response to
3 comments from members of the public to address noise, aesthetic impacts, snow
4 drift, and setbacks from residences. The Project changes generally decrease the
5 total area occupied by the BESS, Solar Facility, and accompanying infrastructure.
6 Finally, changes were made to mitigate and avoid impacts to the Nobles County
7 drain tile. The capacity of the Solar Facility and BESS have not changed. All
8 design changes were outlined in the Application Amendment and were evaluated
9 in the EA prepared by Commission Energy Infrastructure Permitting (PUC EIP).

10
11 **Q. What changes did Applicants make regarding concerns about the Project's
12 noise impact?**

13 A. Summit Lake Storage has revised the Project to relocate the BESS farther away
14 from the city of Reading. Specifically, the initial Application proposed that the BESS
15 be located on approximately 16 acres in the south-central portion of the Preliminary
16 Project Development Area, adjacent to the east side of the Project Substation and
17 just north of the city of Reading. Summit Lake Storage now proposes to relocate
18 the BESS to the north-northeast to reduce noise impacts, increase the distance
19 between the BESS and the city of Reading, and to avoid collection lines associated
20 with the Nobels County Wind Farm. Relocating the BESS as proposed will
21 increase the distance from the Facility and the nearest residence by 890 feet.
22 Summit Lake Storage, moreover, has selected a different BESS model than
23 proposed in the initial Application. The new model will be quieter than the
24 previously evaluated model.

25
26 Finally, Applicants proposed revisions to the Project layout increases the distance
27 between Project construction areas and the nearest noise sensitive area by 178
28 feet, thereby reducing the construction-related noise impacts.

1 **Q. Do the updates to the design change anything about the anticipated noise**
2 **impacts of the Project?**

3 A. The new BESS location, modified equipment, and revised Project layout will
4 reduce both the operational and construction noise impacts resulting from the
5 Project, which will be below the applicable limits set in Minnesota Rules 7030.0040
6 at noise receptors.

7
8 **Q. What changes did Applicants make in response to concerns regarding the**
9 **Project's aesthetic impacts?**

10 A. Applicants have increased setbacks from all residences and the property lines of
11 non-participating residential property. Applicants have also identified locations
12 where vegetative screening will be added to the final Project design to mitigate
13 visual impacts on adjacent residences. Summit Lake Solar has engaged with some
14 owners of adjacent residences regarding preferred vegetative screening options
15 and incorporated the feedback received into the most recent Project layout and
16 Landscape Plan. Summit Lake Solar will continue to engage with owners of
17 adjacent residences regarding the vegetative screening plan. Proposed vegetative
18 screening areas are shown on the Landscape Plan provided in Schedule B. The
19 Applicants are amenable to Section 5.4 of the BESS and Solar DSPs regarding
20 visual screening.

21 To further mitigate impacts to neighboring residents, Summit Lake Solar has
22 offered Good Neighbor Agreements to owners of adjacent residences. These
23 agreements are in addition to any vegetative screening that may be proposed
24 between the Project and adjacent residences.

25
26 Finally, Summit Lake Solar and Summit Lake Storage have updated the Project
27 layout to shift the BESS farther away from the city of Reading, remove solar arrays
28 from areas near the city of Reading and the intersection of McCall Avenue and
29 190th Street and to increase setbacks from non-participating property lines, non-
30 participating residential property lines, residences, public drain tile and the
31 centerline of roads. The revised BESS location will abide by all Nobles County

1 required setbacks and increase BESS setbacks from the nearest non-participating
2 residence from 261 feet to 1,151 feet. Summit Lake Solar has designed the solar
3 array to include setbacks of at least: 66 feet from non-participating property lines
4 (that are not residential property); 150 feet from non-participating residential
5 property lines; 300 feet from all existing residences; 75 feet from the center line of
6 public drain tile; and 122 feet from the centerline of all roads. All setbacks exceed
7 Nobles County setback requirements except the Nobles County required setbacks
8 of 150 feet from all non-participating property lines and 200 feet from the centerline
9 of roads. Complete compliance with these Nobles County setbacks without
10 impacting the proposed nameplate capacity of the Project is made difficult by the
11 Applicants' design changes to reduce impacts to the surrounding community:
12 relocating the BESS away from the city of Reading into an areas previously
13 proposed for solar array; removing of portions of the solar array near the city of
14 Reading and the intersection of McCall Avenue and 190th Street; as well as to
15 increase residence setbacks to 300 feet meant that Summit Lake could not abide
16 by the Nobles County required 150-foot setback from non-participating property
17 lines (except for non-participating residential property lines- which will have a 150-
18 foot setback) or the 200-foot setback from the centerline of roads.

19
20 **Q. Do the updates to the design change anything about the anticipated**
21 **aesthetic impacts of the Project?**

22 A. Reconfiguring the Solar Facility and BESS to increase distances from neighboring
23 property lines and residences and installing and maintaining additional vegetative
24 screening as proposed in the Application Amendment – as detailed Schedule B –
25 are anticipated to reduce the anticipated aesthetic impacts of the Project.

26
27 **Q. What changes did Applicants make in response to concerns regarding the**
28 **Project's potential impacts to the Nobles County public drain tile?**

29 A. Summit Lake Solar and Summit Lake Storage have made several changes to the
30 Project to address concerns raised by members of the public as well as the Nobles
31 County Drainage Authority related to potential impacts to public drain tile.

1 First, solar array setbacks from public drain tile will be increased from 42 feet to 99
2 feet. BESS setbacks from public drain tile will be increased from 35 feet to 84 feet.
3 In all cases, all Project facilities will maintain a 75-foot setback on each side of
4 public drain tile centerlines.

5
6 Summit Lake Solar has also revised the Project to relocate the solar arrays
7 originally planned for the northwest corner of the intersection of McCall Avenue
8 and 190th Street such that the existing public drain tile in this location will not be
9 disturbed by the Project.

10
11 Finally, to address concerns related to potential impacts to private drain tiles
12 potentially impacted by the Project, Summit Lake Solar has been working with
13 participating landowners to map the locations of existing private drain tile and has
14 also proposed Drainage Compensation Agreements to private landowners that
15 would provide compensation for any construction-related drainage impacts.
16 Applicants will use the private drain tile location information in the design of the
17 Project. If private drain tile cannot be avoided, it will be repaired or replaced to
18 ensure adequate drainage during construction and operation of the Project.

19
20 **Q. Do the updates to the design change anything about the anticipated potential**
21 **Project impacts to the drain tile?**

22 A. Increasing setbacks from Project facilities and public drain tile, avoiding impacts to
23 the public drain tile near the intersection of McCall Avenue and 190th, relocating
24 public drain tile, if approved by the Nobles County Drainage Authority, and
25 committing to avoiding, repairing or replacing private drain tile are all anticipated
26 to reduce the impacts of the Project on the private and public drain tile systems,
27 and will ensure the existing functionality of the private and public drain tile systems
28 within the sites are maintained.

1 **Q. What changes did Applicants make regarding concerns about the Project's**
2 **potential impacts related to snow drift?**

3 A. Following consultation with local stakeholders, including Summit Lake and Elk
4 Township supervisors, the Project has been redesigned to provide a 50-foot
5 setback between all Project fencing and the edge of the public right-of-way to
6 address concerns about potential impediments to snow removal. Summit Lake
7 Solar further performed a snow drift analysis for the Project. That analysis
8 confirmed the efficacy of the proposed setback to reduce potential snow drifting on
9 public roads, which will also mean there will be less need for significant snow drift
10 removal from roads within and adjacent to the Project. Summit Lake Solar further
11 proposes the installation of vegetative screening in specific areas identified by
12 snow drift analysis to mitigate snow drift impacts. The vegetative screening areas,
13 that will function as living snow fences, have been incorporated into the Project
14 design and Landscape Plan provided in Schedule B.

15
16 **Q. Has the total Preliminary Development area proposed by the Project**
17 **changed?**

18 A. Yes. As proposed in the Application Amendment, the total Preliminary
19 Development Area has been reduced from approximately 1,482 to 1,417 acres, for
20 a total reduction of approximately 65 acres. The bulk of the reductions are the
21 result of the proposed redesign of the solar arrays, which reduces the total footprint
22 of the arrays by approximately 75 acres. While the net effect of the proposed
23 changes to the Project is to decrease the total preliminary development area,
24 certain aspects of the Project will encompass larger areas, including the
25 stormwater ponds, which will occupy an additional 11 acres than originally
26 proposed, and the BESS facility which will occupy an additional 5 acres.

1 **V. LOCAL EMPLOYMENT & ECONOMIC BENEFITS**

2

3 **Q. Will the Project result in local employment and economic benefits?**

4 A. Yes. The Project will provide significant socioeconomic benefits to local
5 construction workers. The Applicants anticipate supporting up to 250 temporary
6 construction and installation jobs for this Project and also following the prevailing
7 wage requirements under Minnesota law and Section 8.6 of the Solar and BESS
8 DSPs. Summit Lake Solar estimates average annual solar energy production tax
9 revenue of approximately \$400,500 for Nobles County and approximately
10 \$100,100 for the townships in which the Project is proposed – Summit Lake and
11 Elk Townships – for a total of approximately \$500,600 in annual production tax
12 revenue to local governments over the life of the Project. In addition, lease and
13 easement payments paid to the participating landowners will offset potential
14 financial losses associated with removing a portion of their land from agricultural
15 production.

16

17 **VI. AGENCY COORDINATION**

18 **Q. Has Summit Lake Solar been working with state and local agencies?**

19 A. Yes. Summit Lake Solar has been coordinating, and will continue coordinating,
20 with state and local agencies, such as SHPO, Summit Lake and Elk Townships,
21 Nobles County and the Nobles County Drainage Authority. The Applicants
22 coordinated with Summit Lake Township, Elk Township, Nobles County, and the
23 Nobles County Drainage Authority when it was redesigning the Project to address
24 the concerns raised by local governments and the public. Those coordination
25 efforts were described in our Application Amendment.

26 **Q. Is there any update regarding Summit Lake Solar's coordination with SHPO?**

27 A. Yes. On April 3, 2025, SHPO commented on the *Phase I Cultural Resource*
28 *Survey, Summit Lake Solar and Battery Storage Project, Nobles County,*
29 *Minnesota* prepared for Summit Lake Solar by Tetra Tech, Inc. SHPO agreed with
30 the Survey's conclusions that archaeological site 21NO0093 – located in the
31 southern portion of the Land Control Area and characterized in the Survey as a

1 “post-contact ‘cultural material scatter’” – should be avoided or evaluated to
2 determine eligibility for listing on the National Register of Historic Places (NRHP);
3 the Project has been designed to avoid impacts to this site. SHPO agreed that
4 provided 21NO0093 is avoided, no NRHP or State Register of Historic Properties
5 will be impacted by the Project. SHPO April 3, 2025 letter is attached to this Direct
6 Testimony as Schedule C.

7 **Q. Describe the coordination with the Nobles County Drainage Authority.**

8 After filing the Application, Summit Lake Solar continued coordination with Nobles
9 County to conduct a feasibility study evaluating options to re-route existing public
10 drain tile and develop appropriate setbacks to public drain tile that would allow the
11 county continued access for maintenance and repairs during the operation of the
12 Project. As a result of the public drain tile study, and as noted in above, Applicants
13 have committed to maintaining a minimum 75-foot setback from public drain tile
14 centerlines.

15
16 On November 21, 2025, the Applicants met with Loretta Halbur, the Nobles County
17 Drainage System Coordinator. I was present at this meeting. During that meeting,
18 the participants discussed the proposed updated Project design as well as field
19 surveys to accurately depict public and private drain tile in the Preliminary
20 Development Area. No public drain tile will be impacted by the BESS. Applicants
21 confirmed that the updated Project layout proposed in the Application Amendment
22 includes the maximum number of proposed Nobles County public drain tile re-
23 routes that will be considered and evaluated by the Applicants. Additionally, and
24 as previously noted, Summit Lake Solar confirmed that the solar arrays originally
25 planned for the northwest corner of the intersection of McCall Avenue and 190th
26 Street have been relocated and the existing public drain tile in this location will not
27 be disturbed by the Project.

28
29 In response to concerns expressed by the Nobles County Drainage Authority
30 during the November meeting, Summit Lake Solar committed, to the extent
31 practicable, to designing collection lines to avoid crossing over existing public drain

1 tiles. Where collection line crossings of public drain tile is otherwise unavoidable,
2 Summit Lake Solar may install collection lines below the existing public drain tile.
3 Summit Lake Solar will continue to coordinate with Ms. Halbur as the Project
4 progresses toward construction and will seek permission from the Nobles County
5 Drainage Authority, as necessary to relocate or abandon public drain tile, prior to
6 construction of the Project. Applicants are amenable to proposed permit
7 conditions 5.6 and 5.10 in the BESS DSP and Solar DSP, respectively related to
8 public drain tile.
9

10 VII. BESS SAFETY 11

12 **Q. What safety measures has Summit Lake Storage undertaken for the BESS?**

13 A. Summit Lake Storage is committed to providing training resources for local
14 emergency responders, as well as working with local emergency responders to
15 develop a Project-specific Emergency Response Plan (ERP). A utility scale
16 battery storage training was conducted for Wilmont and Worthington Fire
17 Departments. The training was hosted on November 6, 2025 by the Energy Safety
18 Response Group (ESRG). ESRG is an independent firm made up of former and
19 current fire fighters focused on the testing and safe development, installation and
20 operations of utility scale battery energy storage systems. Approximately 7
21 volunteers attended the training. Summit Lake Storage will provide annual training
22 on battery technology used in the BESS and associated facility technology for local
23 firefighting crews and emergency services personnel as required by Section 5.13
24 of the BESS DSP.

25 The ERP will require annual safety drills and/or safety training with local first
26 responders. The ERP will cover possible incidents that could occur at the BESS
27 and include corresponding emergency response procedures. Summit Lake
28 Storage will coordinate with local emergency responders to develop the ERP prior
29 to construction of the Project. At least 14 days prior to the pre-construction
30 meeting, Summit Lake Storage, as required by Section 8.11 of the BESS DSP, will
31 file an ERP, together with any comments from emergency responders on the ERP.

1 At least 30 days prior to the pre-construction meeting, as required by Section 5.14
2 of the BESS DSP, Summit Lake Storage will file a Hazard Mitigation Analysis that
3 details the equipment testing results, technology risks, and an affidavit of
4 distribution of the analysis to emergency responders with jurisdiction over the area
5 in which the Project will be located.

6 7 **VIII. EA AND DSPS** 8

9 **Q. Have you reviewed the EA prepared by the PUC EIP unit for the Project?**

10 A. Yes, PUC EIP filed the EA on March 11, 2026. Included with the EA were the Solar
11 DSP and the BESS DSP prepared by PUC EIP. I have reviewed the EA and the
12 DSPs and offer the following comments.

13 **Q. Do you have any comments on the EA?**
14

15 A. Yes. Section 4.3.3 of the EA provides a discussion of impacts to cultural values
16 that appears to be largely based on how the Project will change the rural,
17 agricultural character of the land. It assessed that the value residents put on the
18 character of the landscape within which they live is subjective, meaning its relative
19 value depends upon the perception and philosophical or psychological responses
20 unique to individuals.¹ The EA, citing the concerns expressed by residents during
21 environmental scoping, noted that because of this, construction of the project
22 might—for some residents—change their perception of the area’s character thus
23 potentially eroding their sense of place. The EA further notes that differences
24 between cultural values related to large industrial facilities and rural character are
25 not anticipated to impact or alter the work and leisure pursuits of residents in the

¹ EA at 50, eDockets No. [20263-229142-01](#) (Mar. 11, 2026).

1 project area in such a way as to impact the underlying culture of the area² but it
2 has the potential to create tradeoffs that cannot be addressed in the site permits.³
3 Nonetheless, the EA recommended inclusion of Section 5.8 of the Solar DSP,
4 which requires Summit Lake Solar enter into a Community Impact Mitigation
5 Agreement with Nobles County that mitigates impacts to the community of
6 Reading. Summit Lake Solar disagrees that a Community Impact Mitigation
7 Agreement is a necessary or prudent site permit condition.
8

9 Summit Lake Solar agrees with the EA that the Project is not anticipated to impact
10 the underlying culture of the area and that potential tradeoffs cannot be addressed
11 in the site permit. As stated in the EA, the Project is located outside of municipal
12 areas, would not impact cultural or historic sites, and would not impact public
13 participation in regional community events. Moreover, there are a number of
14 positive impacts of the Project for the local community, including that the Project
15 will not create disproportionate or adverse impacts to low-income or minority
16 populations; the Project will not disrupt local communities or businesses; the
17 economic benefits of the Project are anticipated to be positive; the use of local
18 workers is expected to have significant positive benefits not just through
19 employment on this Project but also by increasing local spending activities and the
20 payment of production tax and lease and easement payments; and the Project is
21 expected to result in a long-term reduction in greenhouse gas emissions.
22

23 Moreover, Applicants agree with the EA that the creation of partnerships between
24 the project owner and community schools, charities and volunteer associations,
25 religious groups, youth organizations, or other clubs or societies active in the host
26 community provides an avenue to mitigate the impacts of renewable energy
27 projects and demonstrates the project owner's commitment to being a good

² EA at 50, eDockets No. [20263-229142-01](#) (Mar. 11, 2026).

³ EA at 6, eDockets No. [20263-229142-01](#) (Mar. 11, 2026).

neighbor in the host community. Applicants are committed to robust community engagement through long-standing practices that include direct community involvement and charitable giving throughout the project lifecycle. Applicants do not believe an agreement with Nobles County is an effective tool to promote direct partnerships with local community groups.

Q. Do you have any comments on the Solar DSP?

A. Yes. After reviewing the Solar DSP, Summit Lake Solar requests that the Administrative Law Judge recommend and the Commission update the location information for the Solar Facility and decline to include Section 5.8 in the Solar DSP.

The correct location for the Solar Facility should be:

County	Township Name	Township	Range	Section
Nobles	Elk	103N	40W	18
Nobles	Summit Lake	103N	41W	10, 12-15, <u>22-24</u>

Summit Lake Solar does not believe that a Community Impact Mitigation Agreement is necessary for the Project, as Summit Lake Solar does not anticipate negative impacts to the city of Reading, its residents, or cultural values: Reading is not an area of environmental justice concern; the Project will not create disproportionate or adverse impacts to low-income or minority populations; the Project will not disrupt local communities or businesses; the Project abides by Nobles County Zoning Ordinance setbacks, to the extent practicable, and has implemented other setbacks that are not required by the Nobles County zoning ordinance; and the economic benefits of the Project are anticipated to be positive.

Comments from the public were mixed, with some supporting and some opposing the Project. The record does not contain a clear indication of community sentiment coalescing around an issue of significant impact, and some of the issues raised by

1 community members are addressed in other permit conditions, such as visual
2 screening to mitigate visual and aesthetic impacts.

3
4 The proposed permit condition Section 5.8 would require Summit Lake Solar to
5 enter into an agreement with the Nobles County, which is not a party in these
6 dockets, and it has not participated to raise issues of concern regarding cultural
7 impacts, so the record does not contain specific evidence relating to the issues
8 that should be addressed in an agreement. The lack of specificity about what an
9 agreement might cover creates uncertainty about Summit Lake Solar's obligations
10 under the proposed permit condition and how non-compliance would be
11 determined, particularly given that the Commission essentially would be requiring
12 an independent local unit of government to enter into this agreement as well.
13 Declining to require such an agreement in a site permit is consistent with a recent
14 site permit issued by the Commission for another solar project in Minnesota.⁴ It is
15 not clear how a permit condition generally requiring a Community Impact Mitigation
16 Agreement will address any specific issues related to potential cultural impacts to
17 some individuals that have expressed concerns about the Project.

18
19 **Q. Do you have any comments on the BESS DSP?**

20 A. Yes. I have reviewed the BESS DSP attached to the EA and request that the
21 Administrative Law Judge recommend and the Commission approve one revision
22 to Section 5.13 of the BESS DSP. Summit Lake Storage requests that special
23 condition 5.13 be revised to align the time period provided for it to obtain an offtake
24 agreement or other enforceable mechanism, with the time period provided in of the
25 DSP for commencing construction. Specifically, Summit Lake Storage proposes
26 that special condition 5.13 be revised to align with BESS DSP general permit

⁴ See *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*, eDockets No. IP-7132/GS-24-215, Findings of Fact, Conclusions of Law, and Recommendations (June 26, 2025); Order and Site Permit for Coneflower Solar Project (Aug. 25, 2025).

1 condition 6 such that the permittee has four years to obtain an offtake agreement
2 or some other enforceable mechanism and to begin construction of the BESS. The
3 Commission has recently granted site permits that align these two permit
4 conditions at four years.

5 Summit Lake Storage also notes that the BESS DSP Sections 5.8, 5.9 and 5.10
6 require the preparation of a Vegetation Management Plan, Agricultural Impact
7 Mitigation Plan and a Drain Tile Reroute and Abandonment Plan, respectively.
8 Summit Lake Storage notes that each of the above plans will also be prepared as
9 requirements of the Solar DSP and Summit Lake Storage anticipates constructing
10 the BESS on a similar timeline as the Solar Facility. Accordingly, Summit Lake
11 Storage requests the Commission allow it to utilize the applicable plans prepared
12 by Summit Lake Solar in compliance with these permit conditions to the extent the
13 plans apply to the BESS and include the information applicable to the BESS rather
14 than completing a separate plan for the Solar Facility and the BESS.

15 IX. CONCLUSION

16
17 **Q. Does this conclude your Direct Testimony?**

18 **A. Yes.**

Alia Mohammad

PROFESSIONAL SUMMARY

Results-driven professional with 10+ years of experience in the utility and energy sector, including 3+ years focused on renewable energy permitting and development.

Experienced in navigating complex state, local, and federal regulatory processes to advance utility-scale solar, wind, energy storage, and emerging power data center projects. Proven ability to represent projects before regulatory bodies, build strong stakeholder relationships, and manage detailed permitting strategies that accelerate commercial project development.

WORK EXPERIENCE

GERONIMO POWER (Formerly National Grid Renewables), Bloomington, MN

Senior Permitting Specialist | March 2026 – Present

- Lead permitting strategy for utility-scale renewable energy developments.
- Coordinate with internal development teams, consultants, and regulatory agencies to advance project schedules and mitigate permitting risk.
- Provide regulatory guidance during project financing and due diligence processes.

GERONIMO POWER (Formerly National Grid Renewables), Bloomington, MN

Permitting Specialist | July 2024 – February 2026

- Secured land-use and environmental permits for renewable energy projects through navigation of complex regulations.
- Developed detailed permit schedules and provided real-time regulatory updates to leadership.
- Supported project financing through mapping, planning data, and permit analyses.
- Participated in industry working groups focused on permitting and compliance.

NATIONAL GRID RENEWABLES DEVELOPMENT, Bloomington, MN

Permitting Associate | April 2023 – July 2024

- Supported permitting across solar, wind, and energy storage projects.
- Prepared and managed complete local permit application submissions.
- Assisted with preparation of project schedules and budgets.

NATIONAL GRID, Syracuse, NY

Senior Environmental Scientist | April 2022 – March 2023

- Coordinated environmental permitting with agencies including NYSDEC, APA, USACE, SHPO, USFWS, and the Public Utilities Commission.
- Maintained relationships with regulatory agencies, consultants, and internal teams.

NATIONAL GRID, Syracuse, NY

Environmental Analyst | July 2019 – March 2022

- Ensured compliance with EPA regulations in the gas and electric utility sector.
- Tracked hazardous and non-hazardous waste shipments and regulatory documentation.

LEIDOS ENGINEERING, LLC, Syracuse, NY

National Account Manager | January 2016 – June 2019

- Managed relationships with six national key accounts.
- Led quarterly customer reviews and expanded energy efficiency business programs.
- Coordinated LED lighting, HVAC, and new construction projects across 3,000+ sites annually.

INNOVATIVE EMPLOYEE SOLUTIONS (Contract) / LEIDOS ENGINEERING, LLC, Syracuse, NY

Energy Efficiency Program Analyst | June 2015 – January 2016

- Maximized energy savings and incentives for six national key accounts.
- Achieved ROI goals for 500+ retrofit and construction projects.

EDUCATION

SUNY College of Environmental Science and Forestry – Syracuse, NY

B.S. Environmental Science, Renewable Energy Focus (May 2015)

SKILLS

- Regulatory Compliance: Public Utilities Commission Processes, State & Local Permitting
- Project Management: Schedule Tracking, Budget Forecasting, Risk Mitigation, Vendor Management (RFP/RFI)
- Collaboration & Communication: Microsoft Teams, SharePoint
- Microsoft Suite: Excel, PowerPoint, Word
- Mapping: GIS Software (ArcGIS, Google Earth)

Attachment A

Landscape Plan

**SUMMIT LAKE SOLAR AND BESS
PROJECT NOBLES COUNTY,
MINNESOTA DRAFT LANDSCAPE
SCREENING PLAN**

Prepared for:



8400 Normandale Lake Blvd., Suite 1200
Bloomington, MN 55437

December 2025

Prepared by:



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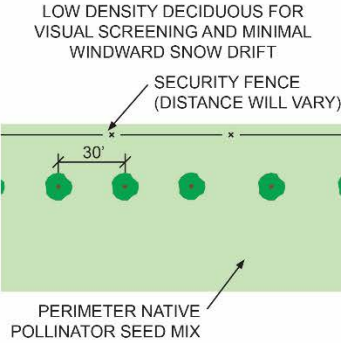
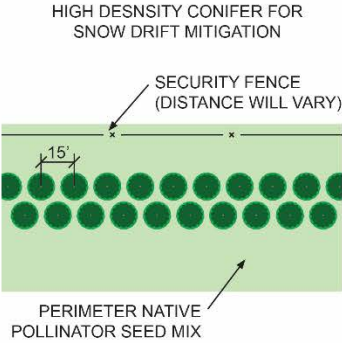
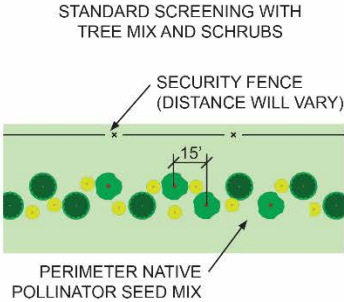
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Scientific name	Common name	Container size	Spacing (ft.)
Deciduous and Coniferous Trees			
<i>Quercus rubra</i>	Northern red oak	10#	15
<i>Crataegus mollis</i>	Downy hawthorn	10#	15
<i>Tilia americana</i>	American basswood	10#	15
<i>Pinus resinosa</i>	Red pine	10#	15
<i>Quercus macrocarpa</i>	Bur oak	10#	15
<i>Pinus banksiana</i>	Jack Pine	10#	15
<i>Quercus macrocarpa</i>	Bur oak	10#	15
Deciduous Shrubs			
<i>Ceanothus americanus</i>	New Jersey tea	10#	6
<i>Amelanchier arborea</i>	Downy Serviceberry	10#	6
<i>Physocarpus opulifolius</i>	Common ninebark	10#	6
<i>Cornus racemosa</i>	Gray Dogwood	10#	6
<i>Rosa blanda</i>	Smooth wild rose)	10#	6
<i>Corylus americana</i>	American Hazelnut	10#	6
<i>Prunus americana</i>	American Plum	10#	6
<i>Rhus glabra</i>	Smooth sumac	10#	6
<i>Viburnum rafinesquianum</i>	Downy arrowwood viburnum	10#	6





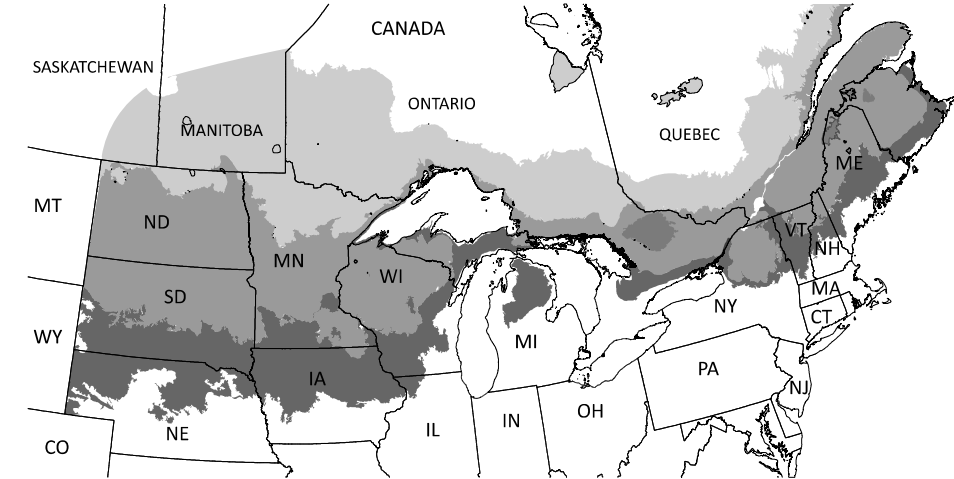
NOT TO SCALE

- ● DECIDUOUS AND CONIFEROUS TREES
- ● ● DECIDUOUS SHRUBS





GENERAL NOTES	
SEE SPECIAL PROVISIONS FOR SPECIFIC PROJECT REQUIREMENTS.	
REFER TO SPECIFICATIONS 2571, 2572, 3861 AND THE INSTALLATION AND CONTRACT ADMINISTRATION MANUAL FOR MnDOT LANDSCAPE PROJECTS FOR GENERAL REQUIREMENTS.	
ACCEPT ALL PLANT STOCK IN ACCORDANCE WITH SPEC. 3861 PRIOR TO PLANTING.	
DEMONSTRATE COMPETENCY FOR ALL PLANT INSTALLATION OPERATIONS IN ACCORDANCE WITH SPECIFICATION 2571.3F1, AND FOR SOIL CULTIVATION IN ACCORDANCE WITH SPEC. 2571.3D.2.	
FOR PLANTING PLAN DIMENSIONS, STATED DIMENSIONS SUPERCEDE SCALING FROM PLAN.	
PLANT TREES AND SHRUBS AT THE CORRECT HEIGHT WITH A VISIBLE ROOT FLARE.	
WATERING GUIDELINES (SEE SPECIFICATION 2571.3G)	
MONITOR AND MAINTAIN SOIL MOISTURE AT ADEQUATE BUT NOT EXCESSIVE LEVELS TO A DEPTH OF 16". THE AMOUNTS LISTED BELOW ARE GUIDELINES.	
PLANT TYPE	AVERAGE GALLONS OF WATER PER APPLICATION
TREES - MACHINE MOVED	50-100
TREES - BALLED AND BURLAPPED	20
TREES - BARE ROOT AND CONTAINER	15
SHRUBS - BALLED AND BURLAPPED	10
SHRUBS - BARE ROOT AND CONTAINER	7
WOODY SEEDLINGS	4
PERENNIALS AND VINES	3



COMPLETE THE CERTIFICATE OF COMPLIANCE TO DOCUMENT THAT ALL PLANT STOCK FURNISHED BY THE CONTRACTOR ON THIS PROJECT IS A OR B:

- A. GROWN AND CULTIVATED ON STATE-INSPECTED NURSERIES WITHIN THE ACCEPTABLE PLANT STOCK GROWING RANGE LIMITS FOR AT LEAST THE PREVIOUS TWO YEARS;
- OR
- B. GROWN OUTSIDE OF THE ACCEPTABLE PLANT STOCK GROWING RANGE LIMITS IF THE SEED SOURCE OR ROOT AND GRAFT STOCK IS CERTIFIED AND DOCUMENTED AS ORIGINATING WITHIN THE ACCEPTABLE PLANT STOCK GROWING RANGE LIMITS.

MAP ADAPTED FROM 2023 USDA PLANT HARDINESS AND 2010 CANADA EXTREME MINIMUM TEMPERATURE ZONES. THIS IS NOT THE OFFICIAL USDA PLANT HARDINESS MAP.

ACCEPTABLE PLANT HARDINESS ZONES		
LEGEND	ZONE	MINIMUM TEMPERATURE RANGE
	3	-30 to -40 F
	4	-20 to -30 F
	5a	-15 to -20 F
UNACCEPTABLE ZONES ARE 0, 1, 2, 5b, 6 (AND HIGHER)		

1

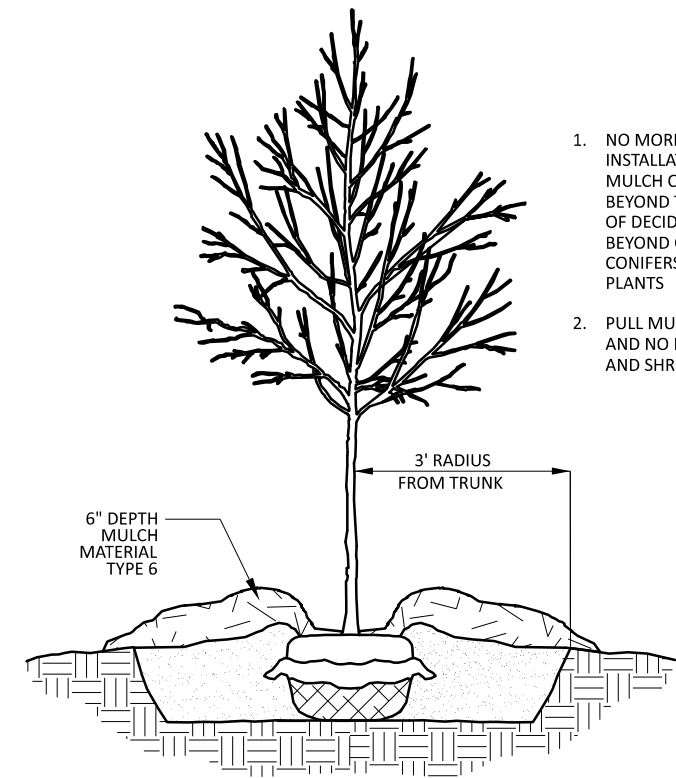
ACCEPTABLE PLANT STOCK GROWING RANGE

PLANTING DATES BY ZONE					
SEASON	PLANT TYPE	3	4	5a	
SPRING	DECIDUOUS	BARE ROOT	APRIL 21 TO JUNE 1	APRIL 7 TO JUNE 1	APRIL 1 TO JUNE 1
			APRIL 21 TO JUNE 30	APRIL 7 TO JUNE 30	APRIL 1 TO JUNE 30
	CONIFEROUS	APRIL 21 TO JUNE 1	APRIL 7 TO MAY 17	APRIL 1 TO MAY 17	
		PERENNIALS	MAY 1 TO JUNE 30	MAY 1 TO JUNE 30	MAY 1 TO JUNE 30
		SEEDLINGS / PLUGS	APRIL 21 TO JUNE 1	APRIL 7 TO JUNE 1	APRIL 1 TO JUNE 1
FALL	DECIDUOUS	BARE ROOT	OCT 1 TO NOV 1	OCT 15 TO NOV 15	OCT 15 TO NOV 15
		CONTAINER B&B	AUG 15 TO OCT 15	AUG 15 TO NOV 1	SEPT 1 TO NOV 1
	CONIFEROUS	APRIL 21 TO JUNE 1	APRIL 7 TO JUNE 1	APRIL 1 TO JUNE 1	
		PERENNIALS	AUG 15 TO SEPT 15	AUG 15 TO SEPT 15	SEPT 1 TO OCT 1

- BARE ROOT PERENNIALS FOLLOW THE DECIDUOUS BARE ROOT PLANTING DATES.
- DATES MAY CHANGE DEPENDING UPON SEASONAL CONDITIONS, AS APPROVED BY THE ENGINEER.
- FALL PLANTING IS NOT ALLOWED FOR BARE ROOT FORM OF THE FOLLOWING SPECIES: HAWTHORN, DOGWOOD, POPLAR, HACKBERRY, LINDEN, IRONWOOD, HONEYLOCUST, BIRCH, MOUNTAIN ASH MAPLE, WILLOW, CRABAPPLE, PLUM/CHERRY, OAKS, AND SUMAC.
- ALL REPLACEMENT PLANTS MUST BE PLACED DURING MONTH OF MAY (SPRING PLANTING) AND SEPTEMBER (FALL PLANTING) DURING THE FIRST YEAR OF THE PLANT ESTABLISHMENT PERIOD.
- TRANSPLANT TREE (MACHINE MOVED) PLANTING DATES ARE SPECIFIED IN THE SPECIAL PROVISIONS.

2

PLANT INSTALLATION PERIOD



- NO MORE THAN 7 DAYS AFTER PLANT INSTALLATION PLACE 6" OF TYPE 6 MULCH ON PLANTING SOIL TO 3' BEYOND THE TRUNK OR OUTER STEM OF DECIDUOUS PLANTS, AND TO 3' BEYOND OUTER BRANCHES OF CONIFERS AND MACHINE MOVED PLANTS
- PULL MULCH BACK NO LESS THAN 3" AND NO MORE THAN 6" FROM TREES AND SHRUBS OR MAIN STEM.

4

MULCH PLACEMENT

Schedule B

NATURAL TARGET PRUNING STEPS:

- USE A CLEAN, SHARP PRUNING SAW OR SCISSOR-TYPE PRUNER TO CUT PART WAY THROUGH THE BRANCH AT POINT A.
- CUT COMPLETELY THROUGH BRANCH FROM POINT B TO A.
- MAKE A FINAL CUT OUTSIDE THE BRANCH COLLAR FROM POINT C TO D LEAVING THE BRANCH COLLAR INTACT RESULTING IN A CONTINUOUS DOUGHNUT-SHAPED CALLUS FORMATION AFTER ONE SEASON OF GROWTH.
- DO NOT PRUNE C TO X TO PREVENT INCOMPLETE OR DEFECTIVE CALLUS FORMATION.
- PRUNE PLANTS PRIOR TO PLANT INSTALLATION OR WHEN DORMANT DURING PLANT ESTABLISHMENT.
- DO NOT PRUNE OAKS IN APRIL, MAY, JUNE AND JULY.

BRANCHES PRUNED AT TRUNK
(NATURAL TARGET PRUNING/ANSI-A300 PRUNING STANDARD)

PRUNING NOTES:

- PRUNE USING CLEAN AND SHARP SCISSOR-TYPE PRUNER OR PRUNING SAW.
- THE BEST TIME TO PRUNE IS LATE DORMANT SEASON OR EARLY SPRING.
- DO NOT PRUNE OAKS IN APRIL, MAY, JUNE OR JULY.

3

PRUNING

AFTER ENGINEER OR INSPECTOR DETERMINES SATISFACTORY KILL OF TURF AND WEEDS, CULTIVATE INPLACE SOIL TO A MINIMUM 12" DEPTH AND MINIMUM WIDTH PER COLUMN A OF THE PLANTING HOLE DIMENSIONS TABLE.

INITIAL SPADING - PASS 1

UNIFORMLY APPLY 4" COMPOST, AND OTHER ADDITIVES IN ACCORDANCE WITH SPECIAL PROVISIONS, TO THE INITIALLY SPADED SOIL.

CULTIVATE COMPOST AND ADDITIVES TO A MINIMUM 12" DEPTH. VERIFY COMPACTION DOES NOT EXCEED 200 PSI.

INCORPORATION - PASS 2

NOTE: REQUIRES COMPETENCY TEST IN ACCORDANCE WITH SPECIFICATION 2571.3D.2.

5

PLANTING SOIL

LICENSED LANDSCAPE ARCHITECT _____ DATE _____		LICENSE NUMBER 26552	I HEREBY CERTIFY THAT THIS PLAN WAS PREPARED BY ME OR UNDER MY DIRECT SUPERVISION AND THAT I AM A DULY LICENSED LANDSCAPE ARCHITECT UNDER THE LAWS OF THE STATE OF MINNESOTA.	LEAD EXPERT OFFICE	MARNI KARNOWSKI CHIEF ENVIRONMENTAL OFFICER OFFICE OF ENVIRONMENTAL STEWARDSHIP	STANDARD PLANTING DETAILS		APPROVED: 08-12-2025 REVISED:	 THOMAS STYRBICKI STATE DESIGN ENGINEER	STANDARD PLAN 5-297.301	1 OF 4
						STANDARD PLAN			STATE PROJ. NO.	SHEET NO.	
									TRUNK HWY.	TOTAL SHEETS	

PLANTING HOLE DIMENSIONS

PLANT TYPE	PLANT AND CONTAINER SIZE	(A) MINIMUM HOLE WIDTH	(B) APPROXIMATE HOLE DEPTH	
DECIDUOUS & ORNAMENTAL TREES	3' BR	46"	13"	
	4' BR	46"	14"	
	5' BR	48"	14"	
	6' BR	54"	15"	
	7' BR	60"	16"	
	8' BR	66"	19"	
	1" CAL BR	54"	14"	
	1.25" CAL BR	60"	14"	
	1.5" CAL BR	66"	15"	
	2" CAL BR	84"	19"	
	4' B&B	42"	11"	
	5' B&B	48"	12"	
	6' B&B	52"	14"	
	8' B&B	66"	16"	
	10' B&B	66"	16"	
	12' B&B	48"	16"	
	1" CAL B&B	54"	14"	
	1.25" CAL B&B	56"	15"	
	1.5" CAL B&B	61"	15"	
	1.75" CAL B&B	66"	16"	
	2" CAL B&B	72"	16"	
	2.5" CAL B&B	84"	19"	
	3" CAL B&B	96"	20"	
	DECIDUOUS SHRUBS, ROSES, AND PERENNIALS	12" BR	24"	7"
		15" BR	28"	8"
18" BR		30"	8"	
2' BR		33"	9"	
3' BR		42"	11"	
4' BR		48"	12"	
5' BR		54"	14"	
6' BR		60"	14"	
CONIFEROUS TREES AT LEAST 2/3 OF ALL CONIFER BRANCHES WILL CONTAIN TERMINAL BUDS	2' B&B	36"	10"	
	3' B&B	42"	11"	
	4' B&B	51"	13"	
	5' B&B	60"	13"	
	6' B&B	66"	15"	
	7' B&B	72"	16"	
	8' B&B	81"	18"	
CONIFEROUS SHRUBS (UPRIGHT)	18"	24"	7"	
	3'	48"	12"	
CONIFEROUS SHRUBS (SPREADING) (SPR)	18" SPR	30"	8"	
	2' SPR	36"	9"	
CONTAINER GROWN PLANTS	CELLPACKS/PLUGS	6"	2.5"	
	4" CONT	11"	4"	
	6" / 1 QT CONT	15"	5.5"	
	1# CONT	18"	6"	
	2# CONT	23"	7.5"	
	3# CONT	29"	8.5"	
	5# CONT	30"	11"	
	7# CONT	37"	11"	
	15# CONT	44"	14"	
	10# CONT	45"	15"	
20# CONT	60"	16"		
SEEDLINGS	6" SEEDLING	15"	14"	
	12" SEEDLING	23"	16"	
	18" SEEDLING	30"	16"	
	24" SEEDLING	36"	18"	
VINES	1 YR MED BR	15"	11"	
	1 YR NO 1 BR	17"	14"	
	2 YR MED BR	33"	12"	
	2 YR NO 1 BR	42"	15"	

1

BARE ROOT STOCK (BR)

1. DEMONSTRATE COMPETENCY IN ACCORDANCE WITH SPECIFICATION 2571.3F.1.

2. SOAK ROOTS IN WATER FOR AT LEAST ONE HOUR BUT NOT MORE THAN 24 HOURS PRIOR TO PLANTING.

3. PREPARE HOLE PER PLANTING HOLE DIMENSIONS TABLE (AxB).

4. PROVIDE CORRECTIVE PRUNING.

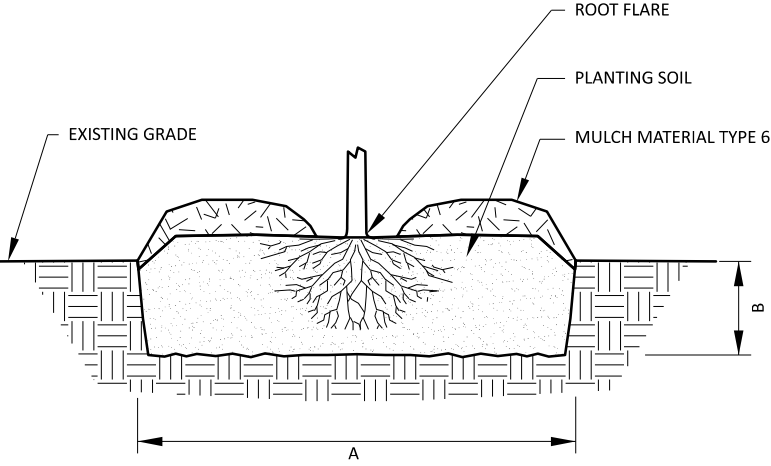
5. TRANSFER PLANT DIRECTLY FROM WATER TO HOLE.

6. PLACE ROOT FLARE AT OR UP TO 2" ABOVE THE FINISHED SOIL ELEVATION.

7. SPREAD ROOTS OUT EVENLY.

8. PLUMB AND BACKFILL WITH PLANTING SOIL.

9. WATER IN ACCORDANCE WITH WATERING GUIDELINES.



2

CONTAINER STOCK (CONT)

1. DEMONSTRATE COMPETENCY IN ACCORDANCE WITH SPECIFICATION 2571.3F.1.

2. PREPARE HOLE PER PLANTING HOLE DIMENSIONS (AxB).

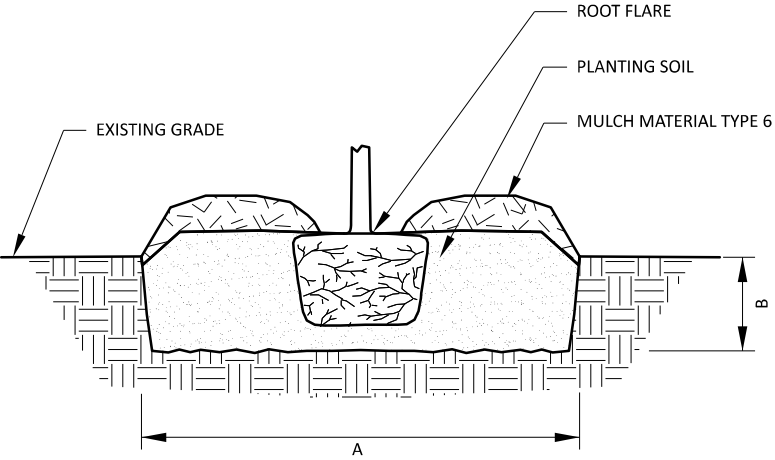
3. PROVIDE CORRECTIVE PRUNING.

4. REMOVE CONTAINER AND SCORE OUTSIDE OF SOIL MASS TO REDIRECT AND REMOVE OR CORRECT STEM GIRDLING ROOTS.

5. SET PLANT ON UNDISTURBED NATIVE SOIL OR THOROUGHLY COMPACTED PLANTING SOIL. PLACE PLANT SO THE TOP OF THE ROOT FLARE IS AT OR UP TO 2" ABOVE FINISHED GRADE.

6. PLUMB AND BACKFILL WITH PLANTING SOIL.

7. WATER IN ACCORDANCE WITH WATERING GUIDELINES.



3

BALL & BURLAP STOCK (B&B)

1. DEMONSTRATE COMPETENCY IN ACCORDANCE WITH SPECIFICATION 2571.3F.1.

2. PREPARE HOLE PER PLANTING DIMENSIONS (AxB).

3. PLACE ROOT FLARE AT OR UP TO 2" ABOVE FINISHED GRADE.

4. SET ROOT BALL ON UNDISTURBED NATIVE OR THOROUGHLY COMPACTED PLANTING SOIL WITH BURLAP AND/OR WIRE BASKET INTACT.

5. REMOVE TOP 1/2 OR TOP TWO HORIZONTAL RINGS OF BASKET AND BURLAP, WHICHEVER IS GREATER.

6. SLIT REMAINING BURLAP AT 6" INTERVALS.

7. PRUNE STEM GIRDLING ROOTS AND BRANCHES.

8. BACKFILL WITH PLANTING SOIL TO APPROXIMATELY 12" BELOW TOP OF BALL.

9. PLACE WATER ON BACKFILLED SOIL TO REMOVE AIR.

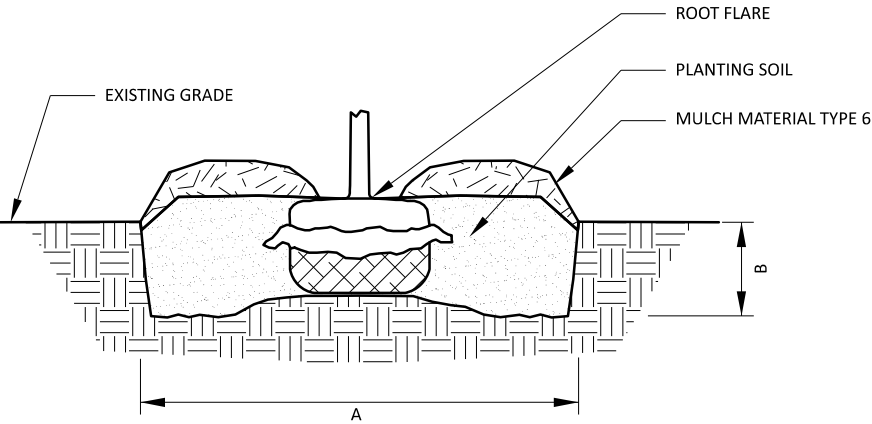
10. PLUMB AND BACKFILL THE REMAINDER OF THE HOLE WITH PLANTING SOIL.

11. WATER WITHIN 2 HOURS TO SETTLE PLANT AND SOILS, AND FILL VOIDS.

12. REPEAT BACKFILL AND WATER APPLICATIONS AS NECESSARY (SEE WATERING GUIDELINES ON SHEET 1 OF 4.)

13. PLACE MULCH WITHIN 48 HOURS OF THE LAST WATERING UNLESS SOIL MOISTURE EXCEEDS GUIDELINES.

14. REMOVE ALL DISCARDED MATERIALS AND DISPOSE OF OFF-SITE.



4

TRANSPLANT TREE

1. DEMONSTRATE COMPETENCY IN ACCORDANCE WITH 2571.3F.1.

2. SCARIFY SIDES AND BOTTOM OF HOLE.

3. PROVIDE CORRECTIVE BRANCH PRUNING.

4. SET PLANT ON NATIVE SOIL AT SAME DEPTH AS IT WAS PREVIOUSLY GROWN.

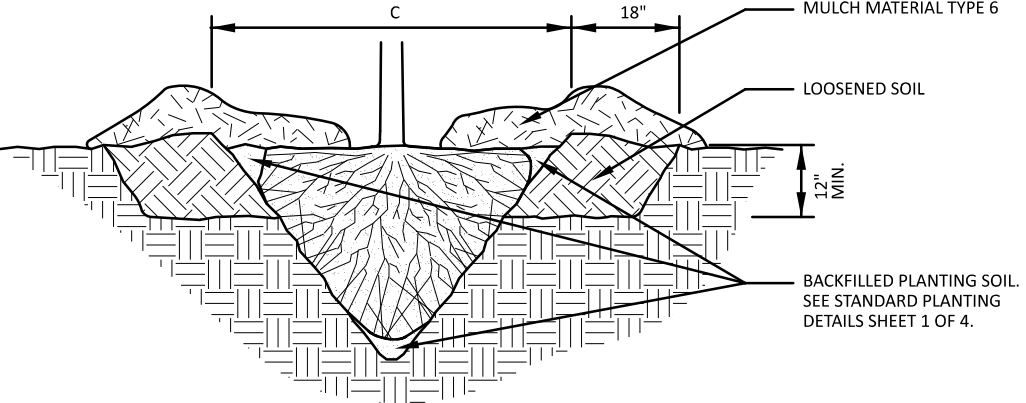
5. PLUMB AND BACKFILL WITH PLANTING SOIL.

6. AFTER PLANTING, LOOSEN THE SOIL IMMEDIATELY ADJACENT TO THE ROOT BALL TO A MINIMUM DISTANCE OF 18" AND A MINIMUM DEPTH OF 12".

7. WATER THOROUGHLY WITHIN 2 HOURS TO SETTLE PLANT AND FILL VOIDS.

8. BACK FILL VOIDS AND WATER A SECOND TIME.

9. PLACE MULCH WITHIN 48 HOURS OF THE SECOND WATERING UNLESS SOIL MOISTURE IS EXCESSIVE.



MINIMUM TREE SPADE SIZE REQUIREMENTS

(C) SPADE DIAMETER SIZE	OAK TREE, CALIPER	DECIDUOUS / ORNAMENTAL TREE, CALIPER	CONIFEROUS TREE HEIGHT
42"	1" to 1.5"	2" to 3"	5' to 7'
60"	1.5" to 2.5"	3" to 4"	7' to 9'
78"	2.5" to 3.5"	4" to 6"	9' to 14'
85"	3.5" to 5"	6" to 8"	14' to 18'

LICENSED LANDSCAPE ARCHITECT

DATE

LICENSE NUMBER 26552

I HEREBY CERTIFY THAT THIS PLAN WAS PREPARED BY ME OR UNDER MY DIRECT SUPERVISION AND THAT I AM A DULY LICENSED LANDSCAPE ARCHITECT UNDER THE LAWS OF THE STATE OF MINNESOTA.

LEAD EXPERT OFFICE

MARNI KARNOWSKI
CHIEF ENVIRONMENTAL OFFICER
OFFICE OF ENVIRONMENTAL STEWARDSHIP

STANDARD PLANTING DETAILS

APPROVED: 08-12-2025
REVISED:

THOMAS STYRBICKI
STATE DESIGN ENGINEER

STANDARD PLAN 5-297.301

2 OF 4

mm
DEPARTMENT OF TRANSPORTATION

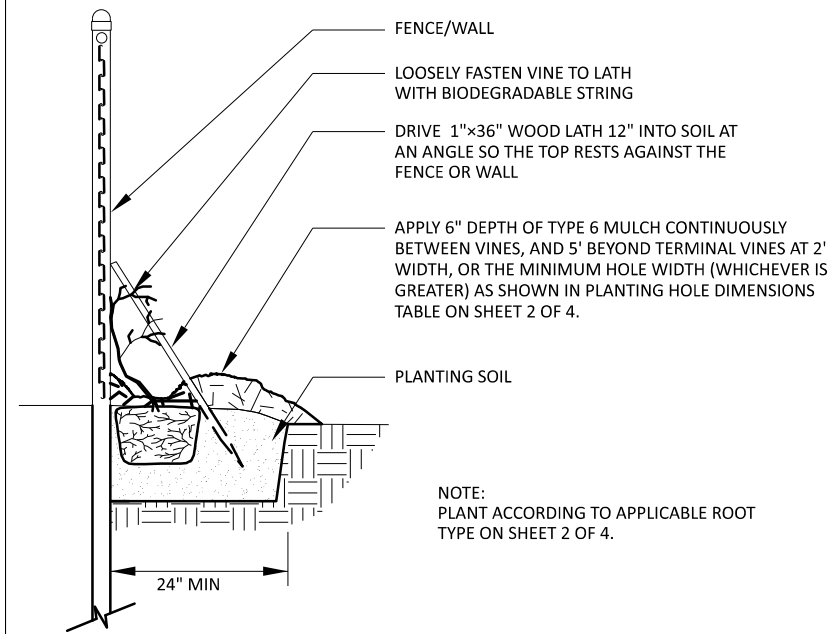
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STATE PROJ. NO.

TRUNK HWY.

SHEET NO.

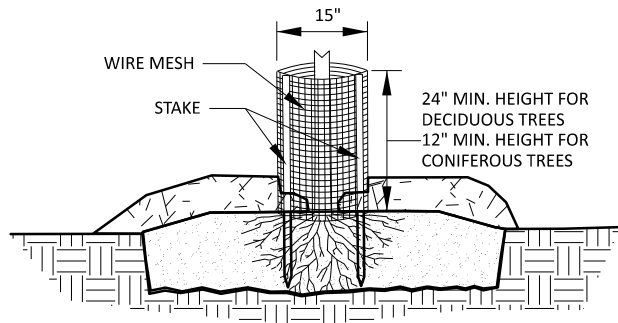
TOTAL SHEETS



1

VINE INSTALLATION

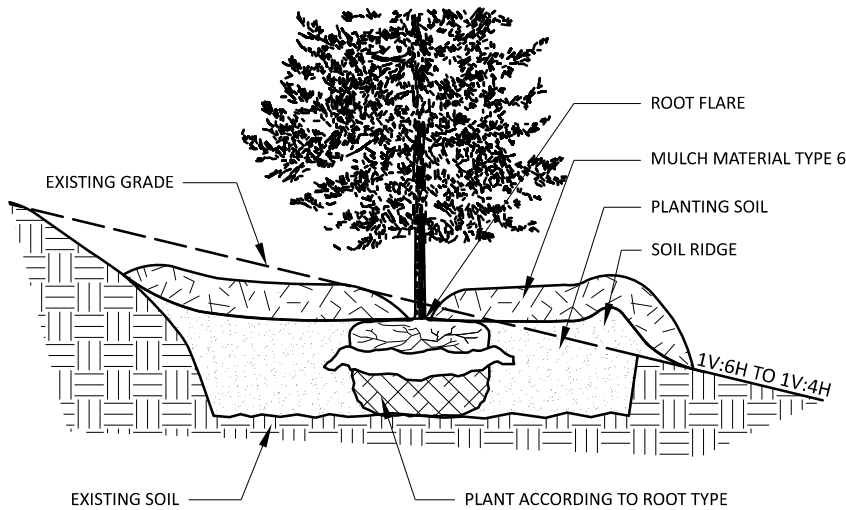
1. FORM A DOUBLE-LAYERED CYLINDER USING $\frac{1}{4}$ " GRID GALVANIZED WELDED WIRE MESH (HARDWARE CLOTH). OVERLAP THE CUT END 2".
2. DRIVE TWO 1"x1" OPPOSING HEARTWOOD WHITE OAK STAKES MIN. 12" INTO THE GROUND, 7" FROM THE CENTER OF THE TREE STEM. STAKE HEIGHT IS 12" LONGER (MIN.) THAN METAL MESH HEIGHT.
3. SECURE THE MESH CYLINDER TO THE OUTSIDE OF THE STAKES USING EITHER SCREWS AND WASHERS, OR CABLE-TIES ALONG THE OVERLAP. SPACE APPROXIMATELY 4" ON CENTER ALONG THE OVERLAP.
 - a. SCREWS SHALL BE ROUND HEAD GALVANIZED $\frac{1}{8}$ " DIA. $\times$ $\frac{3}{4}$ " LONG WITH WASHERS.
 - b. CABLE-TIES SHOULD BE NYLON, 8" LONG MIN. AND 75 LB TO 120 LB TENSILE.
4. EMBED THE LOWER EDGE OF THE MESH CYLINDER 1" BELOW THE SOIL SURFACE WITHOUT DISTURBING THE TREE ROOTS.
5. CUT MESH EDGES ARE NOT PERMITTED AT THE TOP OF THE CYLINDER. STAKES ARE FLUSH WITH THE TOP OF THE CYLINDER.
6. MULCH WITHIN THE CYLINDER SHALL NOT EXCEED 3" DEPTH, PULL MULCH BACK FROM THE TRUNK AS SPECIFIED IN THE MULCH PLACEMENT DETAIL.
7. THE BOTTOM WHORL OF PINE AND LARCH BRANCHES MAY REQUIRE REMOVAL TO ALLOW INSTALLATION OF 12" MIN. HEIGHT RODENT GUARDS.
8. USE ON DECIDUOUS, PINE AND LARCH TREES. DO NOT USE ON SPRUCE TREES.
9. LEAVE RODENT GUARD IN PLACE FOLLOWING FINAL ACCEPTANCE.



4

TREE TRUNK PROTECTION

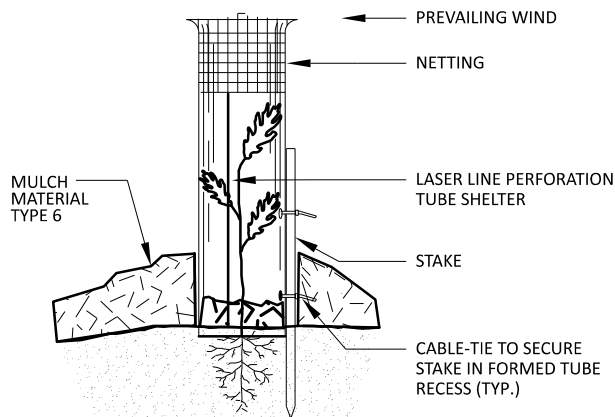
1. AVOID UNNECESSARY SLOPE DISTURBANCE.
2. REPAIR DISTURBED SOIL IMMEDIATELY TO PREVENT SOIL EROSION.
3. PLACE ROOT FLARE AT OR UP TO 2" ABOVE FINISHED GRADE.
4. SHAPE PLANTING HOLE OR BED TO BE LEVEL IN PLANTED AREA. CREATE SOIL RIDGE ON DOWNSLOPE SIDE TO HOLD WATER.



2

SLOPE PLANTING, SHALLOW

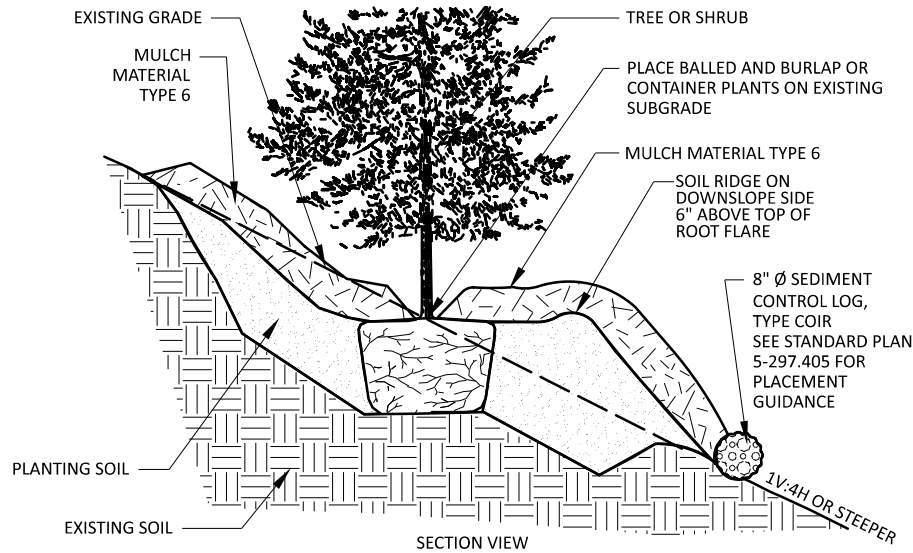
1. FOR EACH SEEDLING PLACE A SEAMLESS, EXTRUDED, TWIN-WALL, RIGID, SEMI TRANSLUCENT POLYPROPYLENE TUBE WITH A LASER LINE PERFORATION AND AN OUTWARD-FLARED TOP RIM.
2. SECURE SHELTER WITH NYLON CABLE-TIES ATTACHED TO A 1"x1" WHITE OAK STAKE IN ACCORDANCE WITH MANUFACTURER'S SPECIFICATIONS TO PREVENT DISLODGING OR TWISTING. STAKE HEIGHT IS 12" LONGER (MIN.) THAN GROW TUBE HEIGHT.
3. EMBED THE BOTTOM OF THE TUBE A MINIMUM OF 1" BELOW THE SOIL SURFACE WITHOUT DISTURBING THE TREE ROOTS.
4. WATER TO FILL VOIDS, ADD SOIL AND REWATER.
5. APPLY TYPE 6 MULCH TO A DEPTH OF 1" - 2" INSIDE OF THE SHELTER AND 6" DEPTH TO THE WIDTH SHOWN ON THE PLANTING HOLE DIMENSIONS.
6. PLACE A PLASTIC PHOTODEGRADABLE NETTING COVER AND SLEEVE OVER THE TOP OF THE TUBE. PULL NETTING DOWN AS SHOWN.



5

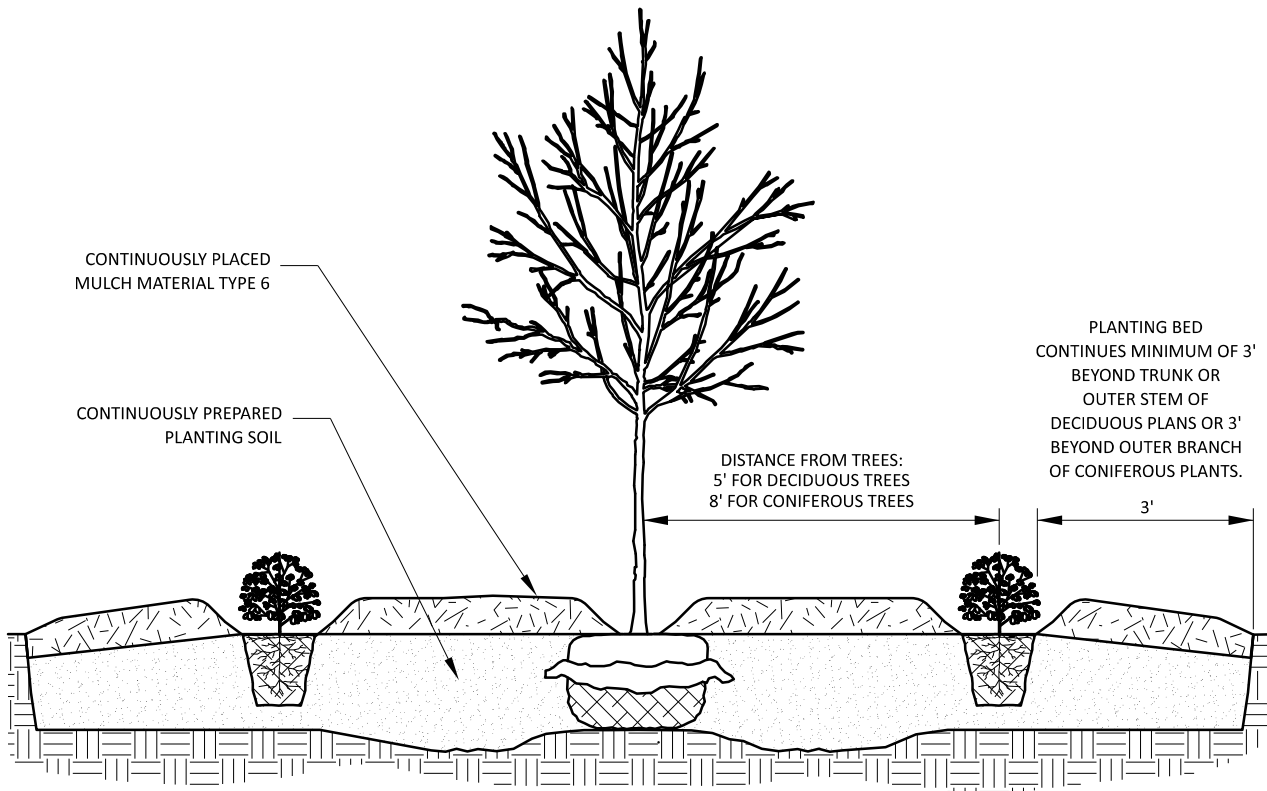
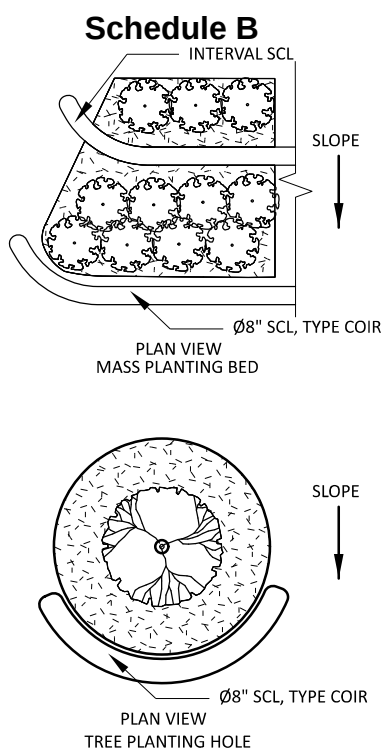
WOODY SEEDLING SHELTER

1. AVOID UNNECESSARY SLOPE DISTURBANCE.
2. REPAIR DISTURBED SOIL IMMEDIATELY TO PREVENT EROSION.
3. PLACE SEDIMENT CONTROL LOGS (SCL) IN A 2" DEPRESSION DOWNSLOPE OF PLANTING BEDS. PLACE SCL ALONG BED LENGTH WITH THE END OF THE LOG CURVED UPSLOPE (SEE PLAN VIEW).
4. IN MASS PLANTING BEDS PLACE SCL AT THE FOLLOWING AVERAGE SPACING INTERVALS:
1V:1H SLOPE = 10 FEET APART
1V:2H SLOPE = 20 FEET APART
1V:3H SLOPE = 30 FEET APART
1V:4H SLOPE = 40 FEET APART



3

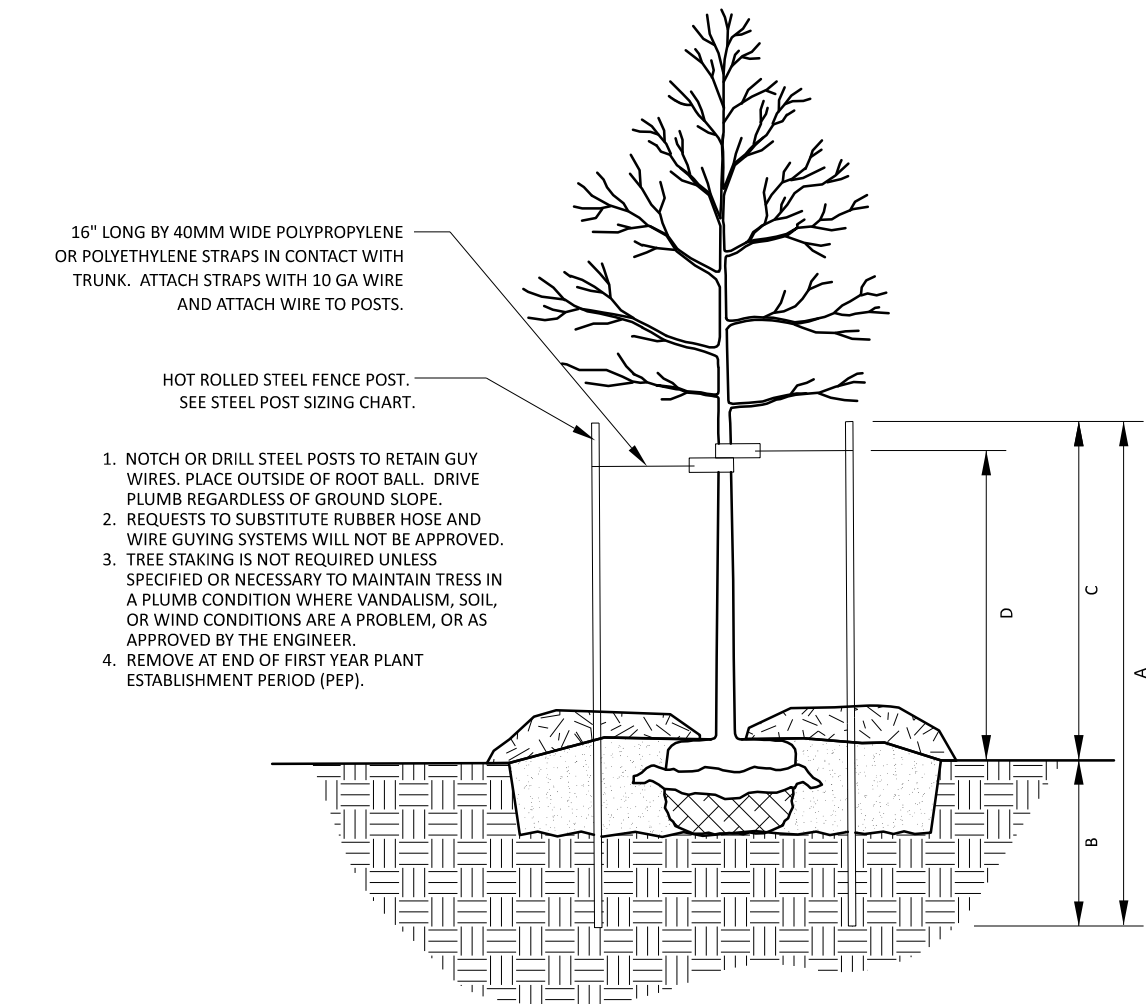
SLOPE PLANTING, STEEP



6

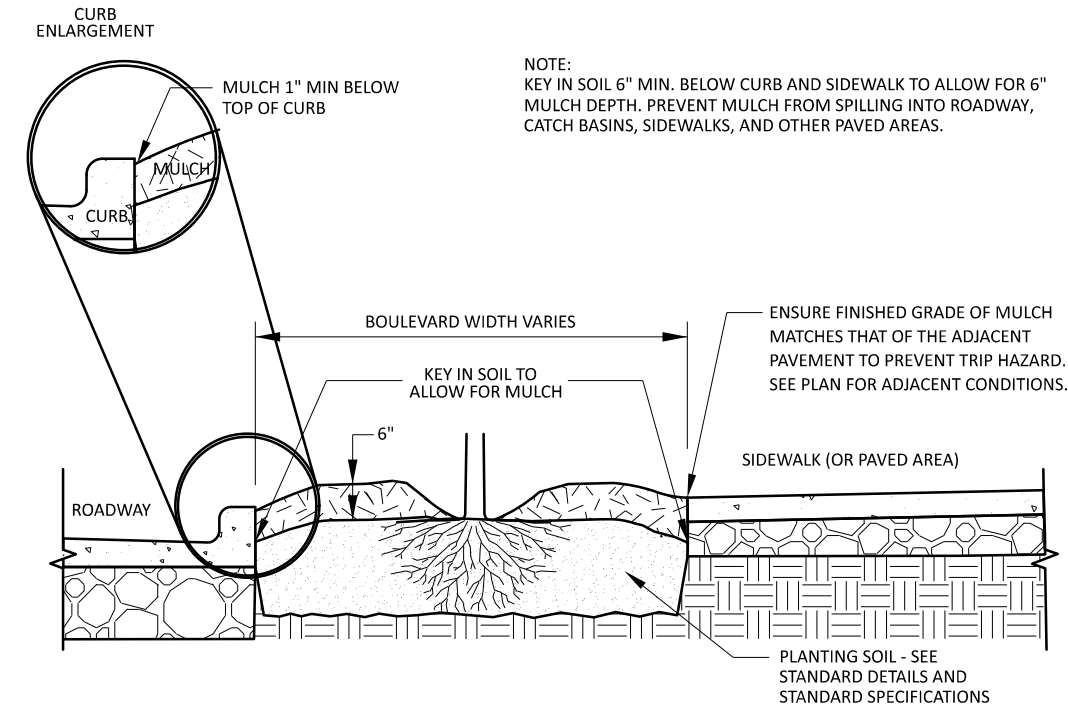
MASS PLANTING BED

LICENSED LANDSCAPE ARCHITECT		LICENSE NUMBER 26552	I HEREBY CERTIFY THAT THIS PLAN WAS PREPARED BY ME OR UNDER MY DIRECT SUPERVISION AND THAT I AM A DULY LICENSED LANDSCAPE ARCHITECT UNDER THE LAWS OF THE STATE OF MINNESOTA.	LEAD EXPERT OFFICE	MARNI KARNOWSKI CHIEF ENVIRONMENTAL OFFICER OFFICE OF ENVIRONMENTAL STEWARDSHIP	STANDARD PLANTING DETAILS	APPROVED: 08-12-2025 REVISED:	THOMAS STYRBICKI STATE DESIGN ENGINEER	STANDARD PLAN 5-297.301	3 OF 4
m DEPARTMENT OF TRANSPORTATION		DATE				STANDARD PLAN			STATE PROJ. NO.	SHEET NO.
									TRUNK HWY.	TOTAL SHEETS

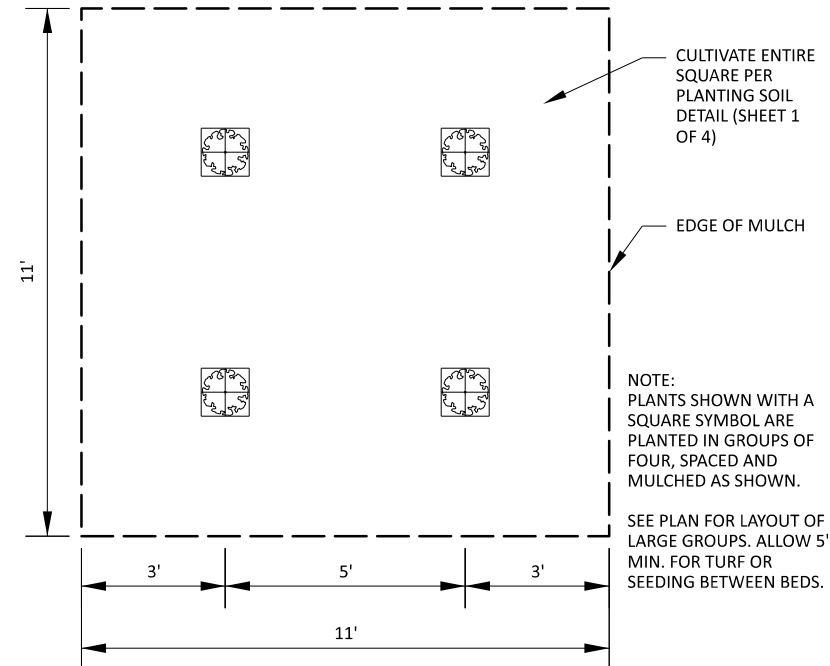


STEEL POST SIZING					
TREE CALIPER	STEEL POST TYPE	A	B	C	D
LESS THAN 4"	HOT-ROLLED STEEL FENCE POST (SPEC. 3403) OR APPROVED EQUAL	7'	3' MIN	4'	3'
GREATER THAN 4"	2.2 LB. FLANGED CHANNEL SIGN POST (SPEC. 3401) OR APPROVED EQUAL	10'	4' MIN	6'	5'

1 STAKING AND GUYING



2 MULCH AGAINST CURB, SIDEWALK, OR PAVED AREA



3 FOUR-SQUARE GROUP PLANTING

Deciduous and Coniferous Trees

Quercus rubra (Northern Red Oak)



Crataegus mollis (Downy Hawthorn)



Tilia americana (American Basswood)



Juniperus virginiana (Eastern Red Cedar)



Pinus banksiana (Jack Pine)



Quercus macrocarpa (Bur Oak)



Deciduous Shrubs

Ceanothus americanus (New Jersey Tea)



Amelanchier arborea (Downy Serviceberry)



Physocarpus opulifolius (Common Ninebark)



Cornus racemosa (Gray Dogwood)



Rosa blanda (Smooth Wild Rose)



Corylus americana (American Hazelnut)



Prunus americana (American Plum)

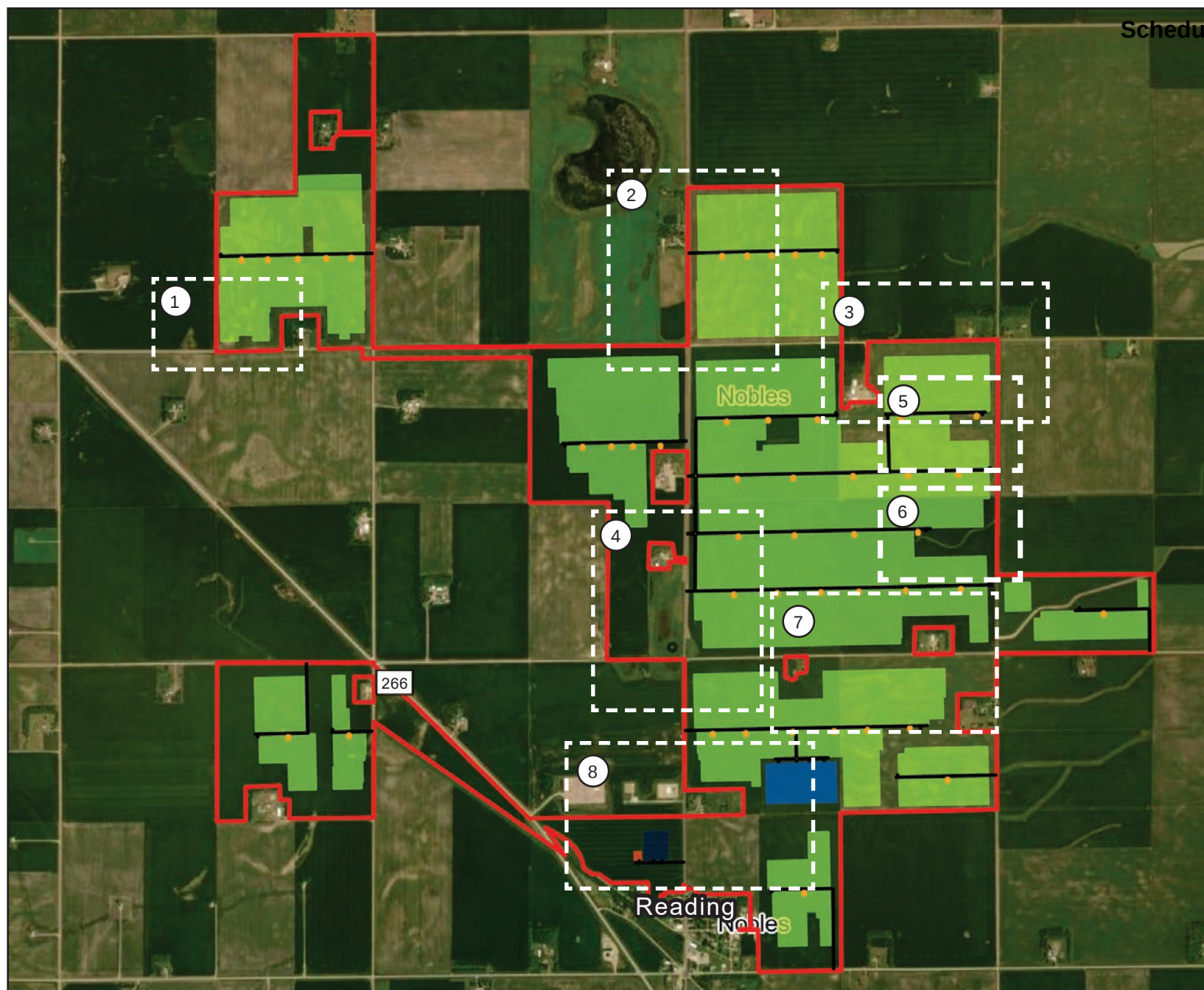


Rhus glabra (Smooth Sumac)



Viburnum rafinesquianum (Downy Arrowwood Viburnum)





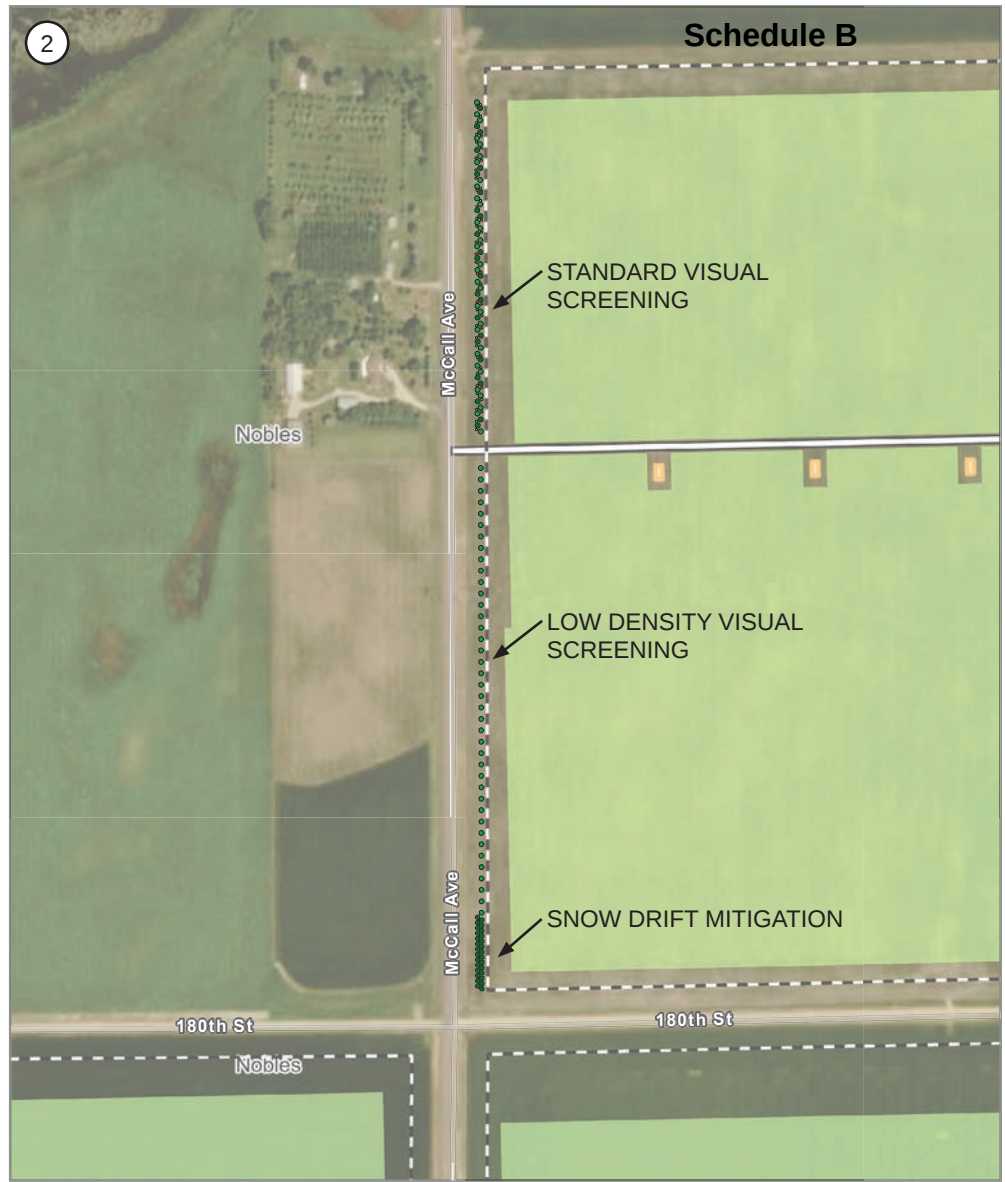
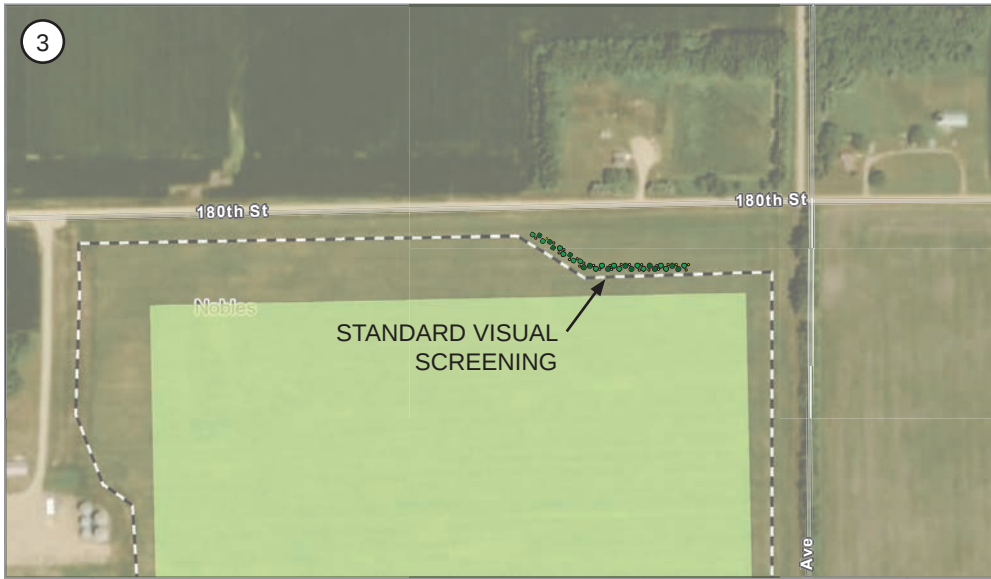
12/03/2025



DRAFT

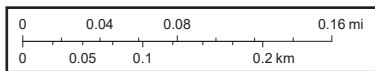
FIGURE 1 VEGETATION SCREENING
SUMMIT LAKE SOLAR

VEGETATION SCREENING PLAN FOR LAYOUT REVIEW
NOT TO SCALE
NOT FOR CONSTRUCTION USE



- Security Fence
- Solar Array
- Project Boundary

- Deciduous Trees
- Conifer Trees
- Deciduous Shrubs

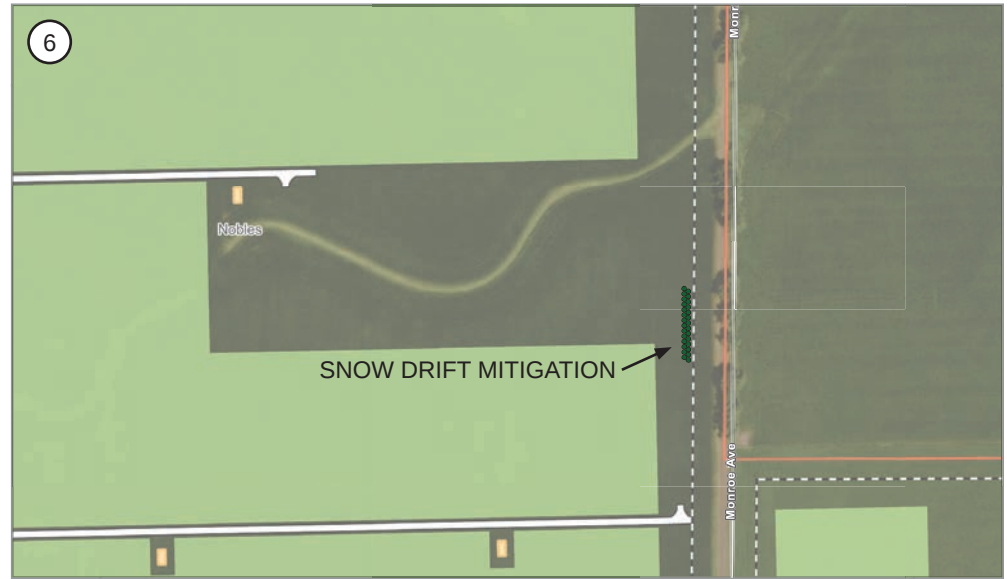
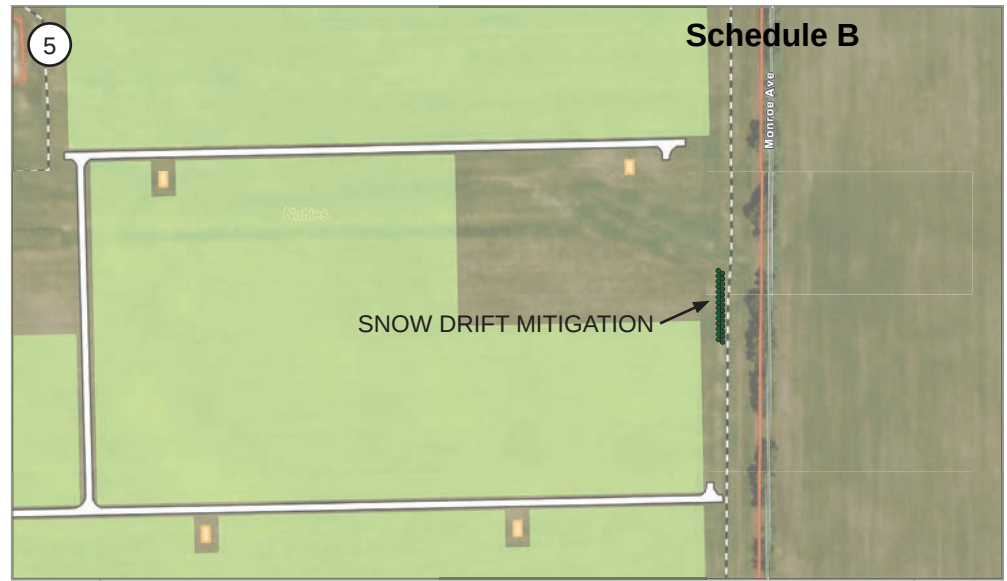


12/03/2025



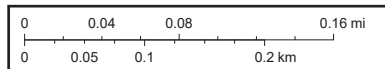
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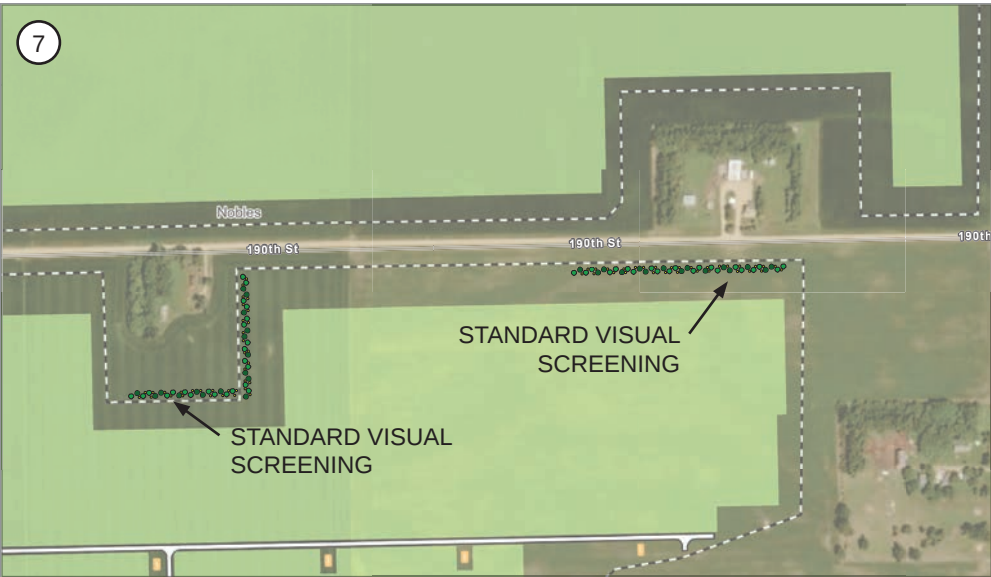


12/03/2025



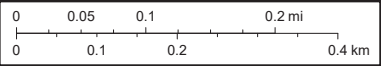
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12/03/2025



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FIGURE 1 VEGETATION SCREENING

SUMMIT LAKE SOLAR

VEGETATION SCREENING PLAN FOR LAYOUT REVIEW
NOT TO SCALE
NOT FOR CONSTRUCTION USE

April 3, 2025

Adam Holven
Principal Investigator for Archaeology
Tetra Tech, Inc.
adam.holven@tetrattech.com

RE: Summit Lake Solar and Battery Storage Project
Nobles County
SHPO Number: 2025-0339a

Dear Adam Holven:

Thank you for the opportunity to comment on the above referenced project. We understand that this project will require a Minnesota Public Utilities Commission site permit. Therefore, the submitted information has been reviewed pursuant to the responsibilities given the State Historic Preservation Office by the Minnesota Historic Sites Act (138.665-666). If this project will be located on non-federal public land, the project will also be subject to review under the Minnesota Field Archaeology Act.

Based on our review of the report, *Phase I Cultural Resource Survey, Summit Lake Solar and Battery Storage Project, Nobles County, Minnesota* (February 19, 2025, Tetra Tech, Inc.) we agree that archaeological site 21NO0093 should be avoided or evaluated to determine its eligibility for listing in the National Register of Historic Places (NRHP).

We agree that Non-Site SL01 is likely not eligible for listing the NRHP; however, in the future we recommend that sites like this be documented as archaeological sites and the investigation should include subsurface testing to look for buried features. Considering the date of demolition for this farmstead, we have determined that it is unlikely that subsurface features exist.

We agree that there are no properties listed in the National or State Registers of Historic Places, or within the Historic Sites Network, that will be affected by this project.

The Unanticipated Discoveries Plan (UDP) lists Katie Manthey Mimbach as the SHPO contact, please replace Katie with Kelly Gragg-Johnson. Additionally, the notification includes a telephone call to SHPO, this is unnecessary, and an email notification will suffice.

The UDP states that in the case that human remains are identified, the Nobles County Sheriff will notify SHPO. SHPO notification is not necessary. Under Minnesota Statute 307.08 ([Minn. Stat. 307.08](#)), the Minnesota State Archaeologist and the Minnesota Indian Affairs Council are the authority for human remains that are not crime scenes.

Please note that this comment letter does not address the requirements of Section 106 of the National Historic Preservation Act of 1966 and 36 CFR § 800. If this project is considered for federal financial

assistance, or requires a federal permit or license, then review and consultation with our office will need to be initiated by the lead federal agency. Be advised that comments and recommendations provided by our office for this state-level review may differ from findings and determinations made by the federal agency as part of review and consultation under Section 106.

If you have any general questions regarding our review of this project, please contact me at 651-201-3285 or kelly.graggjohnson@state.mn.us. For questions regarding archaeology, please contact Lucy Harrington, Environmental Review Archaeologist, at (651) 201-3283 or lucy.harrington@state.mn.us.

Sincerely,

Kelly Gragg-Johnson

Kelly Gragg-Johnson
Environmental Review Specialist

**In the Matter of the Application of Summit
Lake Solar, LLC for an up to 200 MW Summit
Lake Solar Energy Generating System Site
Permit for the Summit Lake Solar Project in
Nobles County, Minnesota**

**Docket No. IP-7150/GS-25-89
CAH Docket Number: 21-2500-41031**

**In the Matter of the Application of Summit
Lake Storage, LLC for an up to 200 MW / 800-
MWh Battery Energy Storage System Site
Permit for the Summit Lake Storage Project in
Nobles County, Minnesota**

**Docket No. IP-7150/ESS-25-88
CAH Docket Number: 21-2500-41031**

CERTIFICATE OF SERVICE

Breann L. Jurek certifies that on the 20th day of March, 2026, she e-filed a true and correct copy of the Pre-Filed Direct Testimony of Alia Mohammad, with Schedules A-C on behalf of Applicants via eDockets (www.edockets.state.mn.us).

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: March 20, 2026

Signed: /s/ Breann L. Jurek
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	Tom	Brett	tbrett@fredlaw.com	Fredrikson and Byron, P.A.		60 South 6th St #1500 Minneapolis MN, 55108 United States	Electronic Service		No	25-88 Official CC Service List
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	25-88 Official CC Service List
3	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	25-88 Official CC Service List
4	Monika	Davis	monika.davis@merjent.com			1 Main Street Suite 300 Minneapolis MN, 55414 United States	Electronic Service		No	25-88 Official CC Service List
5	Jeremy	Duehr	jduehr@fredlaw.com	Fredrikson & Byron, P.A.		60 S Sixth St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	25-88 Official CC Service List
6	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	25-88 Official CC Service List
7	Craig	Janezich	craig.janezich@state.mn.us		Public Utilities Commission	121 7th Pl E #350 St. Paul MN, 55101 United States	Electronic Service		No	25-88 Official CC Service List
8	Breann	Jurek	bjurek@fredlaw.com	Fredrikson & Byron PA		60 S Sixth St Ste 1500 Minneapolis MN, 55402 United States	Electronic Service		No	25-88 Official CC Service List
9	Molly	Leisen	mleisen@fredlaw.com	Fredrikson & Byron P.A.		60 South Sixth Street Suite 1500 Minneapolis MN, 55402 United States	Electronic Service		No	25-88 Official CC Service List
10	Kimberly	Middendorf	kimberly.middendorf@state.mn.us		Office of Administrative Hearings	PO Box 64620 600 Robert St N Saint Paul MN, 55164-0620 United States	Electronic Service		Yes	25-88 Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
11	Alia	Mohammad	amohammad@nationalgridrenewables.com	Summit Lake Solar, LLC		c/o National Grid Renewables 8400 Normandale Lk, Blvd, #1200 Bloomington MN, 55437 United States	Electronic Service		No	25-88 Official CC Service List
12	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	25-88 Official CC Service List
13	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	25-88 Official CC Service List
14	Sam	Weaver	sam.weaver@state.mn.us		Public Utilities Commission		Electronic Service		No	25-88 Official CC Service List

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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	25-89 Official CC Service List
3	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	25-89 Official CC Service List
4	Monika	Davis	monika.davis@merjent.com			1 Main Street Suite 300 Minneapolis MN, 55414 United States	Electronic Service		No	25-89 Official CC Service List
5	Martin	Donovan	martin.donovan@state.mn.us		Department of Natural Resources	500 Lafayette Road St Paul MN, 55155 United States	Electronic Service		No	25-89 Official CC Service List
6	Jeremy	Duehr	jduehr@fredlaw.com	Fredrikson & Byron, P.A.		60 S Sixth St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	25-89 Official CC Service List
7	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	25-89 Official CC Service List
8	Craig	Janezich	craig.janezich@state.mn.us		Public Utilities Commission	121 7th Pl E #350 St. Paul MN, 55101 United States	Electronic Service		No	25-89 Official CC Service List
9	Breann	Jurek	bjurek@fredlaw.com	Fredrikson & Byron PA		60 S Sixth St Ste 1500 Minneapolis MN, 55402 United States	Electronic Service		No	25-89 Official CC Service List
10	Molly	Leisen	mleisen@fredlaw.com	Fredrikson & Byron P.A.		60 South Sixth Street Suite 1500 Minneapolis MN, 55402 United States	Electronic Service		No	25-89 Official CC Service List
11	Kimberly	Middendorf	kimberly.middendorf@state.mn.us		Office of Administrative Hearings	PO Box 64620 600 Robert St N Saint Paul MN, 55164-0620	Electronic Service		Yes	25-89 Official CC Service List

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						United States				
12	Alia	Mohammad	amohammad@nationalgridrenewables.com	Summit Lake Solar, LLC		c/o National Grid Renewables 8400 Normandale Lk, Blvd, #1200 Bloomington MN, 55437 United States	Electronic Service		No	25-89 Official CC Service List
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