

Office of Land Management

395 John Ireland Boulevard MS 678
Saint Paul, MN 55155

September 16, 2025

Jessica Livingston
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

Re: In the Matter of Lake Charlotte Solar, LLC's joint application for the Lake Charlotte 150-MW Solar Facility and 150-MW Lake Charlotte Battery Energy Storage System (BESS) located in Rutland Township, Martin County, Minnesota
Docket Number: IP-7159/GS-25-206 (Solar Facility) IP-7159/ESS-25-205 (Storage Facility)

Dear Ms. Livingston,

On August 7th, 2025, the Minnesota Public Utilities Commission (Commission) issued a Notice of Public Information and Environmental Assessment Scoping Meetings on Lake Charlotte, LLC's (Applicant) site permit application for the construction and operation of the Lake Charlotte Solar Project, an up to 150-megawatt solar energy generating facility and 150-megawatt battery energy storage system (Project). The Minnesota Department of Transportation (MnDOT) has reviewed the application and other materials regarding the proposed Project and submits the following comments and recommendations in response to the Notice.

Because of the Project's proximity to and potential impacts on trunk highway (TH) 15, MnDOT would like to note possible impacts on areas of concern or interest listed below. Although noted in Appendix A of the Joint Site Permit Application and because Project components can change during and after the Commission's permitting process, these potential impacts are again noted below. Attention should be paid to MnDOT's requested consultation and deliverables as they may be required for future utility permit application approvals. Additional consultation may be required to address outstanding issues.

The Preliminary Project Layout included in the Site Permit Application shows no proposed Project access points or areas of collection line/Gen-Tie colocation affecting TH 15. The Applicant is expected to notify MnDOT in a timely manner should this change as we would like to opportunity to review and conduct the appropriate district and resource group staff coordination for any potential change(s) to TH impacts.

MnDOT notes that there are several water basins in close proximity to the TH 15 right of way (ROW). The Applicant should ensure that any water basins located will not negatively impact existing land and infrastructure surrounding the project area. Specifically, water basin locations should not change peak runoff rates to the TH ROW. A MnDOT District Hydraulics Engineer may need to review the project to determine if a drainage permit is needed [MnDOT Drainage Permit Application](#). A drainage permit is required for all types of drainage changes on TH ROW.

MnDOT's internal ArcGIS mapping system indicates the " ex. archaeological location" at the corner of TH 15 and 170th St as noted in preliminary mapping shared during early coordination does overlap into MnDOT ROW. If any Project work is planned in this area that affects MnDOT ROW, a permit will be required and will need to be reviewed by our Office of Environmental Stewardship Cultural Resources Unit.

The proposed Project boundary is located along a high vulnerability snow trap which may trigger a specific set of human and environmental impacts if adjacent land use alterations occur. Alternately, the Project has the potential to aid in the severity of the snow trap. The Applicant should clarify whether the proposed Project will adversely impact these resources. It is recommended that the Applicant work with MnDOT's Blowing Snow Control team to discuss and resolve potential impacts to this area.

Should the Commission issue Site Permit for the Project, continued coordination with MnDOT staff is expected. Any MnDOT permits required as a part of this Project can be coordinated at an earlier time but may not be issued until the Commission has approved all necessary permits for this Project. All applicable [permitting](#), [traffic control](#) and construction coordination efforts should be made through the appropriate MnDOT [district staff](#). MnDOT District Specialists should be given the opportunity to participate in pre-construction meetings as they apply to MnDOT-owned property.

Thank you for the opportunity to provide these comments.

Sincerely,

/s/ Stacy Kotch Egstad

Utility Routing and Siting Coordinator
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Office of Land Management
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ec: MnDOT District 7 Permits