

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

In the Matter of the Application of Lake Charlotte Solar, LLC for a Solar Energy
Generating System Site Permit for the up to 150 MW Lake Charlotte Solar Facility in
Martin County, Minnesota

In the Matter of the Application of Lake Charlotte Solar, LLC for an up to 150 MW / 600-
MWh Battery Energy Storage System Site Permit for the Lake Charlotte Storage Project
in Martin County, Minnesota.

MPUC Docket Nos. IP-7159/GS-25-206 and IP-7159/ESS-25-205
CAH Docket No. 65-2500-40800

**DIRECT TESTIMONY OF MARTA LASCH
ON BEHALF OF
LAKE CHARLOTTE SOLAR, LLC**

February 18, 2026

1 I. INTRODUCTION AND QUALIFICATIONS

2
3 **Q. Please state your name, employer, and business address.**

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

8
9 **Q. Please briefly describe your educational background and professional
10 experience.**

11 A. I graduated from Iowa State University with a Bachelor of Science Degree in
12 Geology. I have worked with Geronimo Power for nearly nine years. I began in a
13 Project Coordinator role, where I was responsible for assisting in the commercial
14 sale of subscriptions to Geronimo Power’s community solar garden program. I then
15 moved into a Permitting Specialist role where I managed and executed strategies
16 to address environmental due diligence and managed the permitting process of
17 utility-scale wind, solar, and battery storage projects. I have been in the Lead
18 Permitting role since July 2024, where I continue to be responsible for the
19 permitting and environmental review of utility-scale renewable energy generation
20 and battery storage projects.

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

23 A. I am testifying on behalf of Lake Charlotte Solar, LLC (Lake Charlotte Solar). Lake
24 Charlotte Solar is a wholly owned subsidiary of Geronimo Power. Geronimo Power
25 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 Lake
2 Charlotte Solar, Geronimo Power will manage ongoing development and
3 construction activities for the Lake Charlotte Solar Project (Solar Facility) and Lake
4 Charlotte Battery Storage Project (BESS). The Solar Facility and BESS are
5 collectively referred to in my Direct Testimony as the Project.
6

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

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

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

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

17 A. On June 3, 2025, Lake Charlotte Solar filed a Joint Site Permits Application for the
18 Solar Facility and BESS with the Commission (Application). The purpose of my
19 Direct Testimony is to: (1) provide an update to the applicant for the BESS; (2)
20 provide an overview of the Project; (3) provide updates on the Project; (4) discuss
21 the coordination between Lake Charlotte Solar, Lake Charlotte Storage and state
22 and local agencies; (5) provide a brief discussion of safety related to the BESS;
23 and (6) provide comments on the Environmental Assessment (EA) and Draft Site
24 Permits for the Solar Facility (Solar DSP) and the BESS (BESS DSP).
25

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

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

- 28 • **SCHEDULE A**: Statement of Qualifications
- 29 • **SCHEDULE B**: Landscaping Plan
- 30 • **SCHEDULE C**: Visual Simulations
- 31 • **SCHEDULE D**: SHPO Consultation Letter

1 **III. PROJECT OWNERSHIP**

2 **Q. Who will own and operate each component of the Project?**

3 A. When the Application was filed, Lake Charlotte Solar was the applicant for the
4 entire Project. After the Application was filed, it was determined that Lake
5 Charlotte Solar will own and operate the Solar Facility, and its affiliate and also a
6 wholly owned subsidiary of Geronimo Power, Lake Charlotte Storage, LLC (Lake
7 Charlotte Storage) will own and operate the BESS. Therefore, concurrently with
8 this Direct Testimony, we are requesting the Commission change the name of the
9 applicant for the above-referenced Energy Storage System (ESS) Docket to Lake
10 Charlotte Storage, LLC. The renamed Docket No. ESS-25-205 would be: *In the*
11 *Matter of the Application of Lake Charlotte Storage, LLC for an up to 150 MW /*
12 *600-MWh Battery Energy Storage System Site Permit for the Lake Charlotte*
13 *Storage Project in Martin County, Minnesota.* Accordingly, Lake Charlotte Solar
14 should be the permittee for a site permit issued by the Commission for the Solar
15 Facility and Lake Charlotte Storage should be the permittee for a site permit issued
16 by the Commission for the BESS.

17
18 **IV. PROJECT OVERVIEW**

19
20 **Q. Please provide a summary of the Project, including the proposed location
21 and proposed site.**

22 The Project consists of the Solar Facility and the BESS. The Solar Facility is
23 proposed as a solar energy conversion facility with an up to 150-MW alternating
24 current (AC) nameplate capacity. The BESS will consist of a stand-alone structure
25 with an up to 150 MW / 600-megawatt hour (MWh) nameplate capacity and
26 ancillary support infrastructure. Both the Solar Facility and the BESS are proposed
27 to share a new substation to be constructed as a part of the Project.

28
29 The Project is proposed to be located in Rutland Township, Martin County,
30 Minnesota. The Project will interconnect to the existing Southern Minnesota
31 Municipal Power Agency (SMMPA) Rutland Substation via a new, approximately

1 365-foot long, 161 kilovolt (kV) generation tie transmission line to be constructed
2 as part of the Project.

3
4 **Q. Why did Lake Charlotte Solar choose the Project Area as presented in the**
5 **Application to build the Project?**

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

23
24 **V. PROJECT UPDATES**

25
26 **Q. Has the anticipated schedule for the construction of the Project changed**
27 **from what was contemplated in the Application?**

28 A. Yes. The Application noted that the Project was expected to be operational by the
29 first quarter of 2029. The Project is now expected to be constructed and
30 operational as early as the third quarter of 2028, although this updated schedule
31 may be subject to change based on status of commercial matters, such as offtake

1 agreements for the sale of the power generated by the Solar Facility and any
2 commercial agreement for the use of the power stored by the BESS. The updated
3 anticipated Project timeline is as follows:

Activity	Application Timeline
Site Permits Issued	Third Quarter 2026
Commencement of Construction	Second Quarter 2027
Testing and Commissioning	Second Quarter 2028
Operation	Third Quarter 2028

4
5 **Q. Are there any design changes related to the Project?**
6 A. Yes.

7
8 **Q. What are those changes?**
9 A. Lake Charlotte Solar made design changes in response to comments from
10 members of the public regarding aesthetic concerns.

11
12 **Q. What changes did Lake Charlotte Solar make regarding concerns about the
13 Project’s aesthetic impact?**
14 A. In its Application, Lake Charlotte Solar indicated that it would develop a
15 landscaping screening plan along and in the vicinity of 170th Street to visually
16 screen the residential areas within the Town of Northrop from the solar arrays.¹
17 The owners of residences along Charlotte Oak Drive have also expressed
18 concerns regarding the potential visual impacts of the Project on their homes.
19 Accordingly, Lake Charlotte Solar has developed a landscaping screening plan to
20 provide landscaping screening in two general portions of the Solar Facility: 1) along
21 and in the vicinity of 170th Street; and 2) along Charlotte Oak Drive. Lake Charlotte
22 Solar believes the proposed landscaping screening plan provides vegetative
23 screening, to the extent practicable, for adjacent residences along 170th Street and

¹ Application at 60.

1 Charlotte Oak Drive (see Schedule B). Section 5.1 of the Solar DSP requires the
2 development of a site-specific Visual Screening Plan that is designed and
3 managed to mitigate visual impacts to adjacent residences. Lake Charlotte Solar
4 has developed a Visual Screening Plan for adjacent residences where the adjacent
5 resident has expressed concern about visual impacts and/or screening could
6 reduce the visual impact of the Solar Facility on adjacent residences (Schedule C).
7 Lake Charlotte Solar will continue to coordinate with landowners adjacent to the
8 site on the landscaping screening plan. Lake Charlotte Solar supports the
9 inclusion of Section 5.1 in the Solar DSP.

10
11 **Q. Do the updates to the design change anything about the anticipated impacts
12 of the Project?**

13 A. The addition of landscaping screening along 170th Street in the vicinity of Northrop
14 and between the Project and the residences along Charlotte Oak Drive is
15 anticipated to reduce the anticipated aesthetic impacts on the residents of Northrop
16 nearest to the Solar Facility and those landowners who reside adjacent to the Solar
17 Facility on Charlotte Oak Drive.

18
19 **VI. AGENCY COORDINATION**

20
21 **Q. Has Lake Charlotte Solar been working with state and local agencies?**

22 A. Yes. Lake Charlotte Solar has been coordinating, and will continue coordinating,
23 with state and local agencies, such as the Minnesota Department of Natural
24 Resources (MDNR), the Minnesota Department of Transportation (MnDOT), the
25 Minnesota State Historical Preservation Office (SHPO), and the Martin County Soil
26 and Water Conservation District.

27 **Q. Please describe your additional coordination with MDNR.**

28 A. Lake Charlotte Solar will continue to coordinate with MDNR regarding fence height.
29 as required by Section 4.3.32 of the Solar DSP, the Solar Facility's Vegetation
30 Management Plan (VMP) as required by Section 4.3.17 of the Solar DSP, the
31 Project's Visual Screening Plan discussed above in my Direct Testimony and

1 required by Section 5.1 of the Solar DSP, and potential impacts from the Project
2 to nearby surface waters due to construction activities, including, but not limited to,
3 erosion and sediment control as required by Section 5.10 of the Solar DSP.

4 **Q. Please describe your additional coordination with MnDOT.**

5 A. In a comment letter, MnDOT expressed concern regarding a documented cultural
6 resource within and adjacent to existing road right-of-way, the designation of the
7 Project site as a 'snow trap' and the potential for stormwater drainage from the
8 Project into existing state road right-of-way. I have reached out to MnDOT
9 regarding these concerns. I have confirmed that the documented cultural resource
10 noted by MnDOT will be avoided by the Project. I have also requested additional
11 information regarding MnDOT's designation of the site as a 'snow trap'. Our
12 preliminary understanding is that, in this area, snow is blown across the adjacent
13 waterbody, Lake Charlotte then collects on the land surface where the Project will
14 be built. We have communicated with MnDOT and indicated our willingness to
15 work with MnDOT to better understand the implications of the area being a 'snow
16 trap'. We believe the Project can and will continue to collect and 'trap' snow within
17 the native vegetation and solar panels planted and installed for the Project.
18 Trapping the snow within the Project may reduce the amount of snow available to
19 drift and deposit on adjacent roads, including Trunk Highway 15 (TH 15), which
20 may preclude the need for any additional snow fencing or other snow drift
21 mitigation strategies adjacent to TH 15. Section 5.2 of the Solar DSP requires
22 coordination with MnDOT regarding vegetative, structural, and/or other snow fence
23 designs necessary to ensure safe operations of TH 15. Lake Charlotte Solar will
24 work with MnDOT regarding its concerns about snow drifting on TH 15, but
25 believes Section 5.2 of the Solar DSP should not assume that snow drift mitigation
26 will be necessary along TH 15 prior to such coordination with MnDOT. In Section
27 VIII of this Direct Testimony, I have outlined edits to Section 5.2 of the Solar DSP
28 to reflect that snow drifting mitigation, if any, should be determined in coordination
29 with MnDOT. Furthermore, Lake Charlotte Solar will continue to work with MnDOT
30 engineers to discuss stormwater basin design for the Project to ensure stormwater

1 basins will not negatively impact peak runoff rates to TH 15 MnDOT right-of-way
2 as required in Section 5.10 of the Solar DSP.

3 **Q. Is there any update regarding Lake Charlotte Solar’s coordination with**
4 **SHPO?**

5 A. The Application provided a summary of the Phase I cultural resources survey
6 conducted by Lake Charlotte Solar’s consultant Tetra Tech, Inc. prior to the
7 Application being submitted. Tetra Tech identified eight previously undocumented
8 archaeological sites during its surveys. Tetra Tech recommended avoidance of
9 one site, which was subsequently excluded from the Project site by Lake Charlotte
10 Solar. Tetra Tech also recommended and then completed shovel testing on the
11 remaining seven archaeological sites. Shovel testing of these sites failed to
12 identify any additional archaeological material below the plow zone. Based on the
13 low potential to yield information significant to Precontact history in the region,
14 Tetra Tech recommended these seven sites as not eligible for listing in the National
15 Register of Historic Places (NRHP). Tetra Tech provided its report, including its
16 findings and recommendations, to SHPO on June 17, 2025.

17 On July 29, 2025, the SHPO provided a response to the report submittal (Schedule
18 D). SHPO stated that the seven sites shovel tested by Tetra Tech were relatively
19 close to each other along the shore of a lake (Lake Charlotte), which the SHPO
20 understands, from archaeological research in the state, is typically the setting of
21 habitation sites that are larger and may be more significant than individual sparse
22 lithic scatters and isolated findspots. Therefore, the SHPO recommended
23 subsurface testing along the shore of the lake to appropriately delineate the
24 boundaries of these sites.

25 To address the potential for additional archaeological materials to be present,
26 Tetra Tech developed an Area of Interest (AOI) for shovel testing encompassing
27 areas within and immediately adjacent to the proposed Project security fence on
28 the broad upland area east of Lake Charlotte. The AOI comprised ten acres and
29 encompassed three of the seven sites of interest to SHPO. Three of the remaining

1 four sites (included in SHPO's initial seven sites of interest) are located beyond the
2 Project's proposed security fence and are not proposed to be impacted
3 (permanently or temporarily) by proposed Project activities; therefore, additional
4 survey was not conducted at these sites. The fourth site is not located adjacent to
5 Lake Charlotte or any other documented sites and was previously shovel tested
6 so it was also not included in the AOI. Tetra Tech conducted additional shovel
7 testing in the AOI and documented three additional archaeological sites. Based
8 on the common, limited cultural materials identified and an absence of
9 archaeological materials below the agricultural plow zone, these sites have a low
10 potential to yield information significant to Precontact history in the region.
11 Therefore, Tetra Tech recommends the additional sites, as well as the original
12 seven sites documented in prior work, are not eligible for listing in the NRHP under
13 Criterion D: Archaeological Potential. Accordingly, Tetra Tech indicated that no
14 further work is recommended at these sites or within the AOI.

15
16 Based on Tetra Tech's analysis, the sites do not warrant protection and may be
17 impacted by the Project. The results of Tetra Tech's additional investigations in
18 the AOI were provided to SHPO on February 10, 2026. Lake Charlotte Solar will
19 file SHPO's response to this additional study upon receipt.

20
21 **Q. Describe the coordination with the Martin County Soil and Water
22 Conservation District.**

23 A. Representatives of Charlotte Lake Solar and Charlotte Lake Storage met with the
24 Martin County Soil and Water Conservation District (Martin SWCD) and the
25 Minnesota Board of Soil and Water Resources (BWSR) on January 20, 2026 to
26 discuss the Project and its potential environmental impacts. Project
27 representatives provided an overview of the Project, including the Project's
28 potential impacts on wetlands. The Martin SWCD, as the local government unit
29 implementing the Wetland Conservation Act, reviewed and approved the
30 delineated wetland boundaries in 2023. It was noted during the meeting that most
31 existing wetlands are primarily farmed wetlands that are distributed throughout the

1 Project and the Project avoids impacts to two large wetlands in the southeastern
2 corner of the site. Lake Charlotte Solar indicated that some of the isolated, farmed
3 wetlands within the Solar Facility may be temporarily impacted by the Project.
4 Wetlands within the Project array will be seeded with a wetland vegetation seed
5 mix in accordance with the Project's VMP required by Section 4.3.17 of the Solar
6 DSP. Lake Charlotte Solar and Lake Charlotte Storage will continue to coordinate
7 with the Martin SWCD and BWSR as needed if the Project will require wetland
8 permits for Project construction activities. Lake Charlotte Solar will also continue
9 to coordinate with the Martin SWCD and the MDNR regarding potential impacts
10 from the Project to nearby surface waters due to construction activities, including,
11 but not limited to, erosion and sediment control as required by Section 5.10 of the
12 Solar DSP. In Section VIII of my Direct Testimony below, Lake Charlotte Solar
13 proposes a minor revision to Section 5.10 of the Solar DSP to reflect the fact that,
14 to my knowledge, there is no state recognized watershed district or water
15 management organization that manages the land and watershed within which the
16 Project is proposed.

17
18 **VII. BESS SAFETY UPDATE**
19

- 20 **Q. What safety measures has Lake Charlotte Storage undertaken for the BESS?**
21 A. Lake Charlotte Storage is committed to providing training resources for local
22 emergency responders, as well as working with local emergency responders to
23 develop a Project-specific Emergency Response Plan (ERP). A utility scale battery
24 storage training was conducted for Northrup and Fairmont Fire Departments. The
25 training was hosted on November 5th, 2025 by the Energy Safety Response Group
26 (ESRG). ESRG is an independent firm made up of former and current fire fighters
27 focused on the testing and safe development, installation and operations of utility
28 scale battery energy storage systems. Approximately 35 volunteers attended the
29 training.

1 In addition, some neighboring landowners were invited to battery storage-focused
2 office hours where a representative from ESRG was present with technical
3 expertise to answer any questions about the BESS. The office hours were held at
4 a participating landowner's office in Northrup on November 5th, 2025. Three
5 individuals attended the office hours.

6 The ERP will require annual safety drills and/or safety training with local first
7 responders. The ERP will cover possible incidents that could occur at the BESS
8 and include corresponding emergency response procedures. Lake Charlotte
9 Storage will coordinate with local emergency responders to develop the ERP prior
10 to construction of the Project. At least 30 days prior to the pre-construction
11 meeting, Lake Charlotte Storage, as required by Section 5.3 of the BESS DSP, will
12 file a Hazard Mitigation Analysis (HMA) that details the equipment testing results,
13 technology risks, and an affidavit of distribution of the analysis to emergency
14 responders with jurisdiction over the area in which the Project will be located.

15
16 **VIII. EA AND DSPS**
17

18 **Q. Have you reviewed the EA prepared by the Commission Energy**
19 **Infrastructure Permitting (EIP) unit for the Project?**

20 A. Yes, EIP filed the EA on February 11, 2026. Included with the EA were the Solar
21 DSP and the BESS DSP prepared by EIP. I have reviewed the EA and the DSPs
22 and offer the following comments.

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

24 A. Yes. After reviewing the Solar DSP, Lake Charlotte Solar requests that the
25 Administrative Law Judge recommend and the Commission approve several
26 revisions to Sections 5.2, 5.3, 5.7 and 5.9 as summarized in the following table:

27

Section No.	Proposed Revision	Explanation for Proposed Revision
5.2	<p>The Permittee shall coordinate with the Minnesota Department of Transportation (MnDOT) regarding existing vegetation between the project area and State Trunk Highway 15. The Permittee shall retain or plant vegetation, as requested by MnDOT, necessary to reduce potential driver distraction, solar glare, and blowing snow.</p> <p>The Permittee shall coordinate with MnDOT regarding vegetative, structural, and/or other snow fence designs necessary to ensure the safe operation of State Trunk Highway 15. The Permittee shall provide documentation of its coordination with MnDOT and illustrate the snow fence design, <u>if any</u>, for the project in the Site Plan filed under Section 8.3.</p>	<p>As discussed above, Lake Charlotte Solar has and will continue coordinating with MnDOT regarding its concerns about the potential for snow to drift onto TH 15. Lake Charlotte Solar believes Section 5.2 should be revised to reflect that MnDOT did not express concerns regarding driver distraction or solar glare in its comments and the need for snow fence designs, if any are necessary to mitigate snow drifting on TH 15, should be determined in coordination with MnDOT</p>
5.3	<p>The Permittee shall provide notice to adjacent residences detailing when major noise-producing construction activities are planned to occur. The permittee shall file with the Commission the results of the noise study within 12 months of operation of the project.</p>	<p>The Solar DSP does not require a post-construction noise study. As noted in the EA, operational noise from the Solar Facility is anticipated to be minimal. Operational Noise for the BESS is anticipated to be moderate due to BESS cooling. Section of 5.2 of the BESS DSP</p>

		<p>requires an evaluation of BESS noise levels post-construction to ensure the BESS meets applicable noise standards. Accordingly, inclusion of a requirement to file a noise study after the Solar Facility achieves commercial operation is misplaced and should not be included in Section 5.3.</p>
<p>5.7</p>	<p>The Permittee shall file a contaminated site analysis of the site detailing the results of a Phase II Environmental Site Assessment of potential contaminated portions of the site at least 14 days prior to the pre-construction meeting. If the contaminated site analysis documents the presence of contaminants exceeding applicable MPCA thresholds, tThe Permittee shall develop a Contaminated Sites Management Plan to be followed in the event that contaminated materials are discovered during construction or operation of the project. The permittee will notify and coordinate with Minnesota Pollution Control Agency for proper removal and disposal of any contaminated materials and restoration of the land.</p>	<p>As noted in the Application, Lake Charlotte Solar conducted a Phase I Environmental Site Assessment of the site, which identified two recognized environmental conditions (RECs) that may or may not impact the site on which the Project is proposed. The identified RECs were approximately 1,500 feet northeast of the subject property which includes the Land Control Area. Lake Charlotte Solar will conduct groundwater sampling as recommended by the Phase I for potential contaminants of concern along the subject property boundary closest to the Rutland Township Garage and Poppe Oil Bulk Plant sites. If, after additional investigation, it is determined the Solar Facility may encounter contaminated groundwater a</p>

		<p>Contaminated Sites Management Plan will be developed. Lake Charlotte Solar believes it prudent to complete the Phase II investigation to determine if contamination is present to warrant the preparation of a contaminated sites management plan. It is entirely possible that no contamination exists on the site.</p>
<p>5.9</p>	<p>The Permittee shall consult with the MNDNR, <u>and</u> the Martin County Soil and Water Conservation District, and the Blue Earth Watershed regarding potential impacts to nearby surface waters due to construction activities, including but not limited to, erosion and sediment control.</p>	<p>Section 5.9 of the Solar Facility DSP requires that Lake Charlotte Solar consult with the MNDNR and Martin SWCD regarding potential impacts to nearby surface waters due to construction activities. Lake Charlotte Solar is amenable to the inclusion of Section 5.9 in the Solar Facility DSP, but requests that the 'Blue Earth Watershed' be struck from the permit language because, to my knowledge, there is no state recognized watershed district or watershed management organization known as the Blue Earth Watershed that governs land on which the Project will be constructed. To determine whether a Blue Earth Watershed District or Management Organization exists, I consulted BWSR's online directory of watershed districts and</p>

		management organizations in Minnesota. ²
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1

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

3 A. Yes. I have reviewed the BESS DSP attached to the EA and request that the
4 Administrative Law Judge recommend and the Commission approve minor
5 revisions to the BESS DSP to reflect that Lake Charlotte Storage will own and
6 operate the BESS and, as such, all references in the BESS DSP to 'Lake Charlotte
7 Solar, LLC' should be replaced with 'Lake Charlotte Storage, LLC' and all
8 references in the BESS DSP to the 'Lake Charlotte Solar Project' be replaced with
9 the 'Lake Charlotte Storage Project'.

10 **IX. CONCLUSION**

11

12 **Q. Does this conclude your Direct Testimony?**

13 A. Yes.

² See Directory of Watershed Districts and Management Organizations in Minnesota <https://elink.bwsr.state.mn.us/public/directory/wmo/list> (accessed February 16, 2026).



EDUCATION

*Bachelor of Science
Geology*
Iowa State University
Ames, Iowa
2016

PROFESSIONAL ORGANIZATION MEMBERSHIPS

Women of Renewable
Industries and Sustainable
Energy (WRISE),
*Renewable Energy
Professional Member*,
2019- Present

American Clean Power
(ACP),
Member, 2018 – Present

Marta Lasch, *Permitting Lead*

GERONIMO POWER, BLOOMINGTON, MN

Jul. 2024 – Present	Permitting Lead
Jul. 2023 – Jul. 2024	Senior Permitting Specialist
Jul. 2018 – Jul. 2023	Permitting Specialist
Jan. 2018 – Jul. 2021	Permitting Associate

SUMMARY OF EXPERTISE

Ms. Lasch currently manages environmental due diligence and land use permitting for utility scale wind, solar and storage projects throughout Minnesota and Wisconsin. Key duties include project management, oversight of consulting firms, stakeholder coordination and community outreach. She has active involvement with project permitting and environmental compliance, engineering design and construction.

DEVELOPMENT PORTFOLIOS

Wisconsin Market: Geronimo Power has a renewable energy project pipeline in the state of Wisconsin in excess of 1 GW. Ms. Lasch is the permitting lead for the state and manages environmental due diligence to advance the development of these projects.

Minnesota Market: Ms. Lasch is the permitting lead for 1 GW of early stage wind projects and 900 MWs of solar and storage in the state as well as other infrastructure development.

Illinois Community Solar: Geronimo Power developed, permitted and sold 24 solar projects totaling in 62 MWs of distributed generation in Illinois.

Texas Market: Ms. Lasch permitted 1 GW of early stage solar of Geronimo Power's over 6 GW pipeline of solar and storage in the state.

OPERATIONAL PROJECTS

Community Solar Gardens Portfolios in Excess of 165 MW: Ms. Lasch had an integral role completing local and environmental permitting on 16 MWs of the community solar projects across Minnesota.

Texas Solar and Storage Portfolio totaling 1,050 MW: Ms. Lasch lead due diligence efforts and permitting to bring three solar and storage projects through financing and to commercial operation.

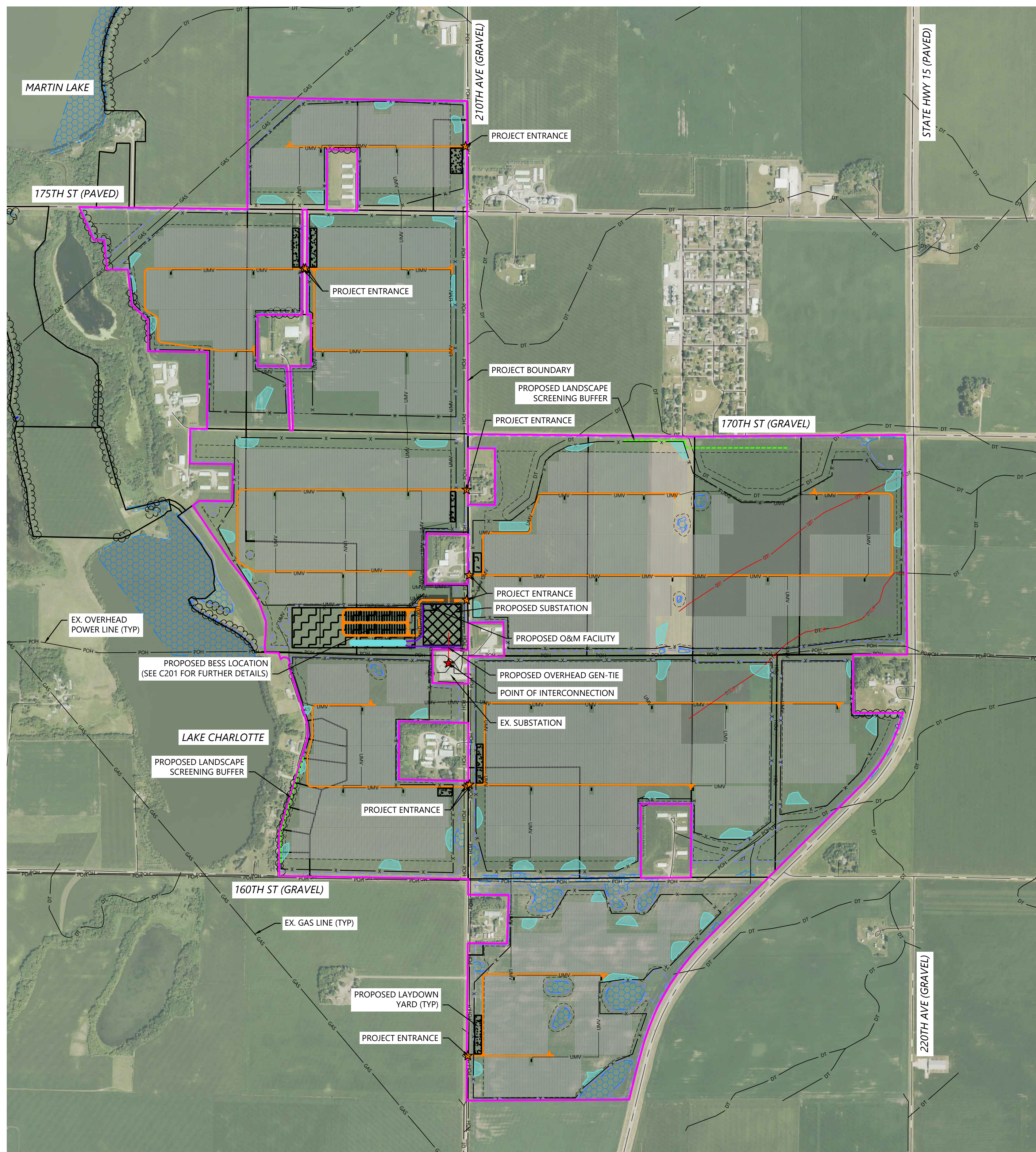
PREPARED FOR:



8400 Normandale Lake Blvd, Suite 1200
 Bloomington, MN 55347

REVISIONS:

#	DATE	COMMENT	BY	CHK	APR
A	03/03/2025	Permit Plans	AW	BV	BV
B	03/12/2025	Permit Plans	AW	BV	BV
C	03/28/2025	Permit Plans with BESS	AW	BV	BV



LEGEND:

- PROJECT BOUNDARY
- EX. ROAD CENTERLINES
- EX. PARCEL LINE
- ~~~~ EX. TREELINE
- EX. OVERHEAD POWER
- EX. GAS PIPELINE
- EX. DRAINTILE
- EX. DRAINTILE PROPOSED TO BE ABANDONED
- EX. STREAM CHANNEL
- EX. WETLAND
- ▭ PROPOSED SOLAR ARRAY
- ▭ PROPOSED ALTERNATE SOLAR ARRAY
- ▭ PROPOSED ELECTRICAL EQUIPMENT
- PROPOSED UNDERGROUND COLLECTION
- PROPOSED OVERHEAD GEN-TIE
- ★ POINT OF INTERCONNECTION
- PROPOSED MODULE SETBACK
- PROPOSED SECURITY FENCE SETBACK
- PROPOSED DRAINAGE SWALE
- PROPOSED ACCESS ROAD
- PROPOSED SECURITY FENCE
- PROPOSED LAYDOWN YARD
- PROPOSED SUBSTATION
- PROPOSED BESS
- PROPOSED O&M FACILITY
- PROPOSED BASIN LOCATION
- ★ PROJECT ENTRANCE
- PROPOSED LANDSCAPE SCREENING BUFFER

NOTES:

1. EQUIPMENT SHOWN WITHIN THIS PLAN IS FOR REFERENCE ONLY AND MAY CHANGE WITH FURTHER DESIGN.
 1.1. LAYOUT IS INTENDING TO SHOW MAX BUILD OUT AND MAY BE IMPACTED WITH ADDITIONAL CONSTRAINTS AND DESIGN.
2. BASIN AREAS SHOWN REPRESENT INTENDED PRELIMINARY BASIN LOCATIONS. SIZE IS NOT REPRESENTATIVE IF THE ACTUAL BASIN SIZE. BASIN SIZING TO BE DETERMINED WITH FURTHER ENGINEERING DESIGN.
3. EXISTING FEATURES SHOWN ARE A COMBINATION OF CLIENT PROVIDED DATA AND PUBLICLY AVAILABLE DATA. DESIGN SUBJECT TO CHANGE.

Project Acreage

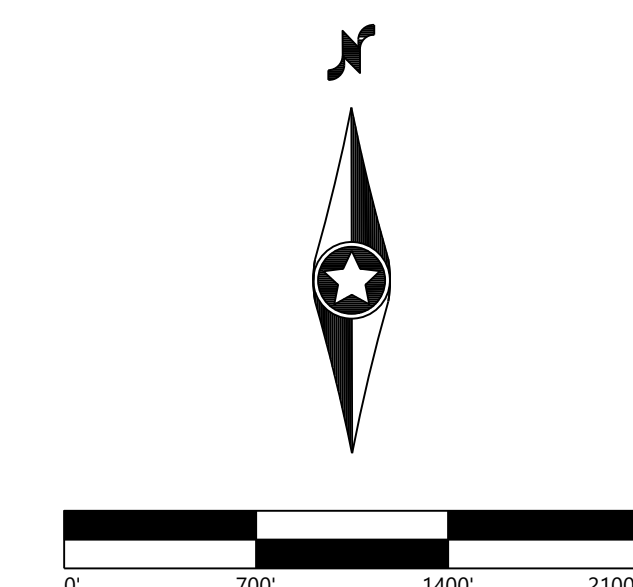
Approximate Fence Area	1,005 Acres
Approximate Fence Length	93,900 LF
Approximate Access Road Length	43,375 LF
Approximate Substation with O&M	5.0 Acres
Approximate BESS	16.0 Acres
Approximate Laydown Yard, Combined	5.5 Acres

Project Setbacks Table

Feature	Required Distance (FT)	Design Distance (FT)
Project Boundary - Agricultural Zoning:		
Front Yard (Measured from Road Centerline)	200	200
Rear Yard	30	53
Side Yard	30	41
Project Boundary - Shoreline Zoning:		
Rear Yard	75	78
Side Yard	40	134
Non-Participating Residence	200	203
Lakes	200	316
Drantile	75	86
Proposed Security Fence (Measured from Parcel Line)	20	21

Inverter Distance Table

Distance from Nearest Home (FT)	Distance from Property Line
352	69



Lake Charlotte Solar Project

Martin County, Minnesota

Overall Site Plan

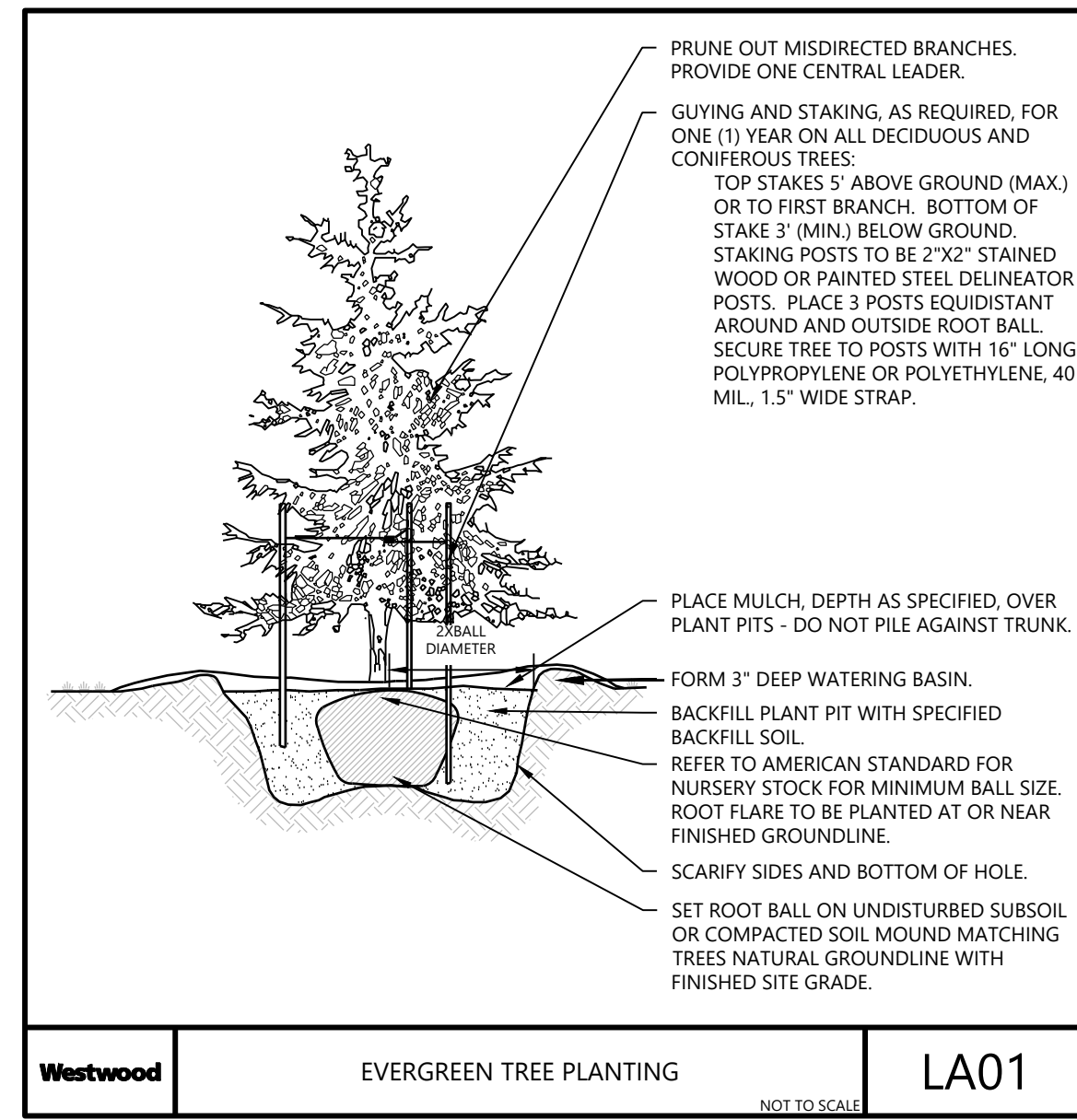
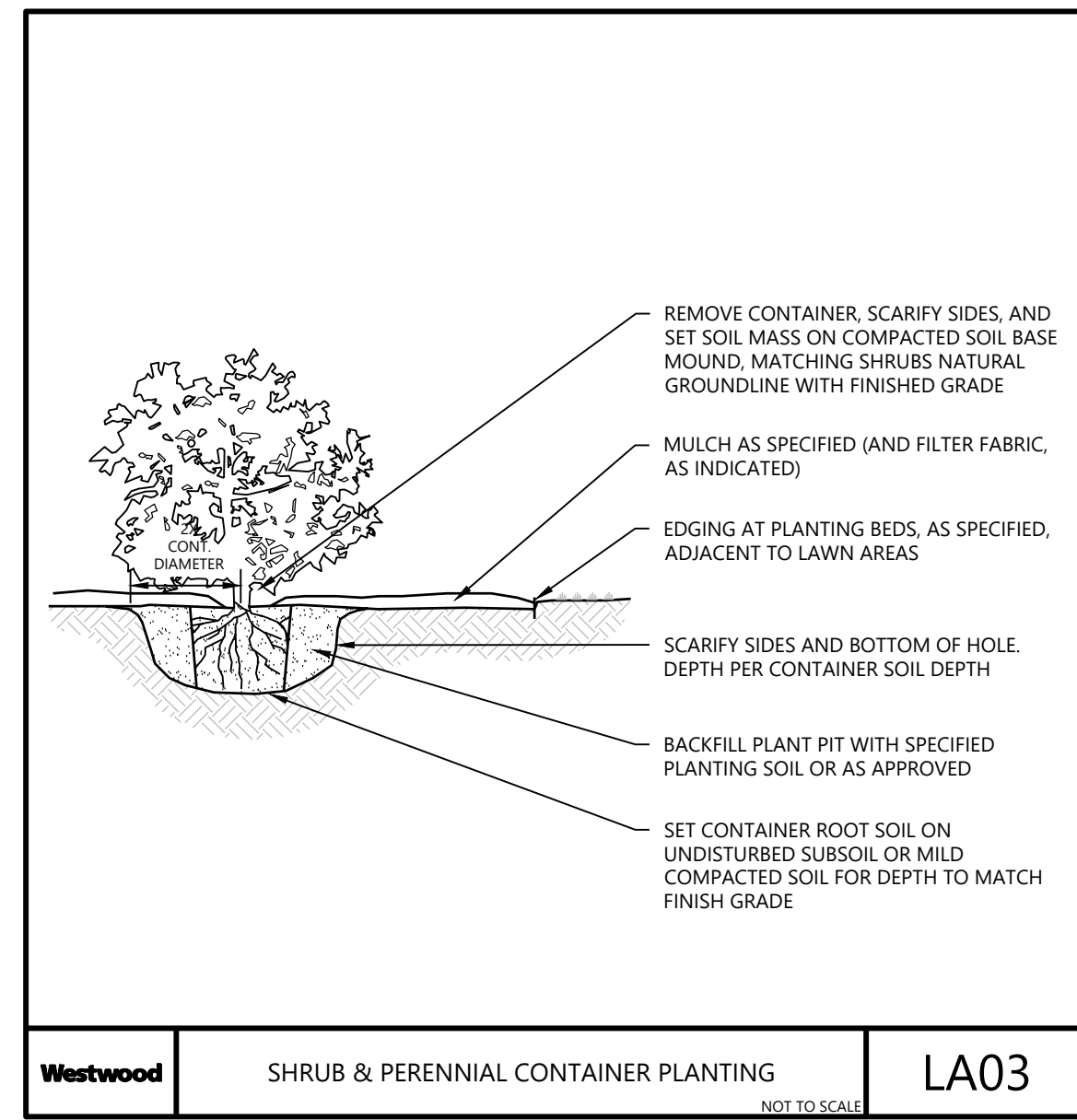
ISSUED FOR PERMIT
 NOT FOR CONSTRUCTION

DATE: 03/28/2025

SHEET: C200

REV: C

PLANTING DETAILS



VEGETATIVE SCREENING SELECTION & INTENT

THE PROPOSED PLANS INCLUDE INSTALLING VEGETATIVE LANDSCAPE BUFFERS WHICH UTILIZE, TO THE EXTENT COMMERCIALY PRACTICABLE, NATIVE TREES AND SHRUBS THAT GROW WELL IN THIS CLIMATE AT STRATEGIC LOCATIONS ACROSS THE PROJECT SITE TO LIMIT DIRECT VIEWS OF THE ARRAY. ONE BENEFIT TO USING NATIVE PLANTS IS THAT THEY ARE ACCLIMATED TO THE PARTICULAR CLIMATE AND ENVIRONMENTAL CONDITIONS, THUS ALLOWING FOR A QUICKER ESTABLISHMENT AND INCREASED SURVIVAL RATES. THE PROPOSED VEGETATIVE LANDSCAPE BUFFERS ARE COMPOSED OF EVERGREEN TREES THAT CAN PROVIDE LUSH GREEN YEAR ROUND SCREENING AND DECIDUOUS SHRUBS THAT CAN HELP PROVIDE ADDITIONAL SCREENING AND BE VISUALLY APPEALING ACROSS MULTIPLE SEASONS. SOME OF THE CHARACTERISTICS THAT THESE NATIVE SHRUBS HAVE BEEN SELECTED FOR INCLUDE FOLIAGE AND STEM COLOR, FLOWERS AND FRUIT PRODUCTION. THE SHRUBS PROPOSED TO BE PLANTED IN SMALL MASSES SO THAT AT ANY ONE TIME IN THE YEAR ONE SPECIES MIGHT DISPLAY SOME OF THESE AESTHETIC CHARACTERISTICS. BEYOND THE AESTHETIC VALUE, THE PROPOSED PLANTS CAN PROVIDE ADDITIONAL WILDLIFE BENEFITS THAT INCLUDE A SOURCE FOR POLLINATORS, SHELTER, FORAGE AND WINTER HABITAT, AS THE PLANTS MATURE THEY WILL GROW CLOSER TOGETHER CREATING A TYPE OF NATURAL HEDGE.

PRELIMINARY SCREENING PLANT MATERIAL



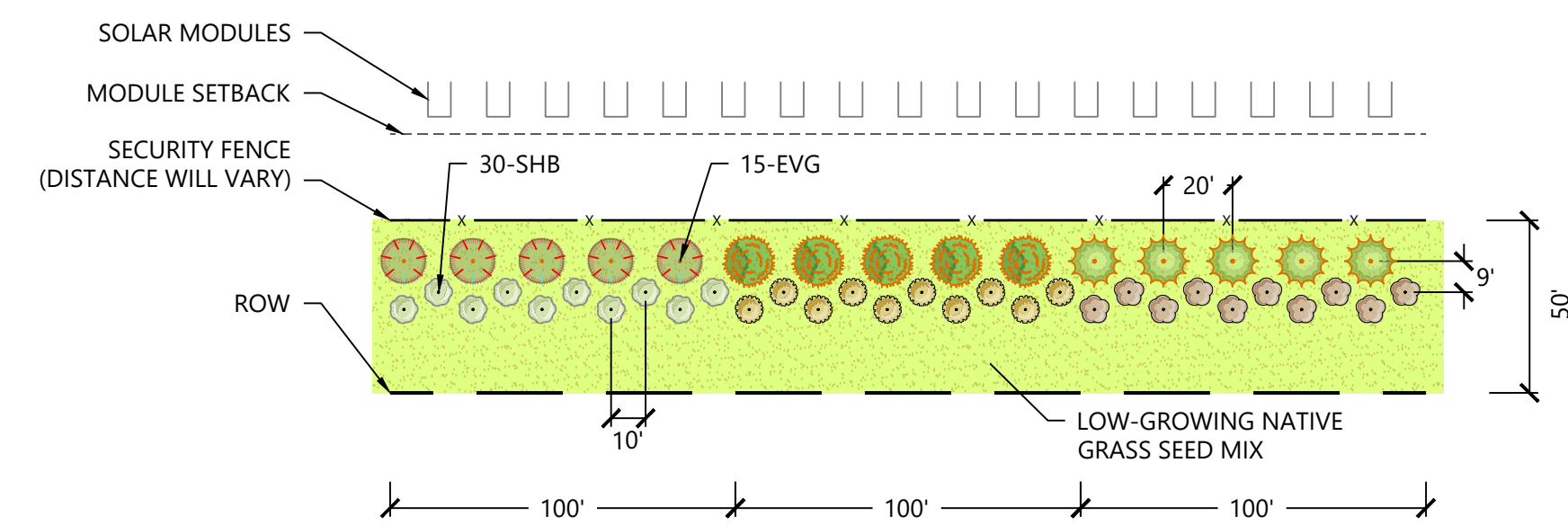
PRELIMINARY SCREENING PLANT SPECIES LIST

COMMON / BOTANICAL NAME	SIZE	ROOT	MATURE SIZE
TREES			
WHITE SPRUCE / PICEA GLAUCA	6' HT.	B&B	H 40'-65' W 15'-25'
WHITE PINE / PINUS STROBUS	6' HT.	B&B	H 40'-65' W 25'-40'
AMERICAN ARBORVITAE / THUJA OCCIDENTALIS	6' HT.	B&B	H 25'-40' W 10'-15'
COMMON / BOTANICAL NAME	SIZE	SPACING O.C.	MATURE SIZE
SHRUBS			
RED TWIG DOGWOOD / CORNUS SERICEA	#5 CONT.	AS SHOWN	H 6-10' W 6-10'
NINEBARK / PHYSOCARPUS OPULIFOLIUS	#5 CONT.	AS SHOWN	H 6-10' W 3-6'
PRAIRIE WILLOW / SALIX HUMILIS	#5 CONT.	AS SHOWN	H 10-15' W 6-10'
AMERICAN ELDERBERRY / SAMBUCUS CANADENSIS	#5 CONT.	AS SHOWN	H 10-15' W 10-15'
ARROWWOOD VIBURNUM / VIBURNUM DENTATUM 'ARROWWOOD'	#5 CONT.	AS SHOWN	H 6-10' W 6-10'
NANNYBERRY / VIBURNUM LENTAGO	#5 CONT.	AS SHOWN	H 10-15' W 6-10'

- NOTES:
1. QUANTITIES ON PLAN SUPERSEDE LIST QUANTITIES IN THE EVENT OF A DISCREPANCY.
 2. B.B. SPECIFIES ROOT TYPE AS BALLED AND BURLAPPED.
 3. H.T. SPECIFIES MINIMUM SPECIMEN HEIGHT UPON INSTALLATION.
 4. #5 CONT. TO MEET MINIMUM SIZE REQUIREMENT OF 24"H OR 30"W FOR DECIDUOUS SHRUBS UPON INSTALLATION. IF PLANT SIZE UNAVAILABLE AT #5 CONT. UPSIZE CONTAINER UNTIL MINIMUM PLANT SIZE REQUIREMENT IS MET.
 5. PLANT SPECIES SUBJECT TO CHANGE BASED UPON AVAILABILITY AT TIME OF PLANTING

PROPOSED LANDSCAPE SCREENING

SCALE: 1" = 50'



PLANTING NOTES

1. CONTRACTOR SHALL CONTACT MINNESOTA DIG SAFE SYSTEM (811) TO VERIFY LOCATIONS OF ALL UNDERGROUND UTILITIES PRIOR TO INSTALLATION OF ANY PLANTS OR LANDSCAPE MATERIAL.
2. ACTUAL LOCATION OF PLANT MATERIAL IS SUBJECT TO FIELD AND SITE CONDITIONS.
3. NO PLANTING WILL BE INSTALLED UNTIL ALL GRADING AND CONSTRUCTION HAS BEEN COMPLETED IN THE IMMEDIATE AREA.
4. ALL SUBSTITUTIONS MUST BE APPROVED BY THE OWNER PRIOR TO SUBMISSION OF ANY BID AND/OR QUOTE BY THE LANDSCAPE CONTRACTOR.
5. CONTRACTOR SHALL PROVIDE ONE YEAR GUARANTEE OF ALL PLANT MATERIALS. THE GUARANTEE BEGINS ON THE DATE OF THE OWNER'S WRITTEN ACCEPTANCE OF THE INITIAL PLANTING. REPLACEMENT PLANT MATERIAL SHALL HAVE A ONE YEAR GUARANTEE COMMENCING UPON PLANTING.
6. ALL PLANTS TO BE SPECIMEN GRADE, MAINE-GROWN AND/OR HARDY. SPECIMEN GRADE SHALL ADHERE TO, BUT IS NOT LIMITED BY, THE FOLLOWING STANDARDS:
 - ALL PLANTS SHALL BE FREE FROM DISEASE, PESTS, WOUNDS, SCARS, ETC.
 - ALL PLANTS SHALL BE FREE FROM NOTICEABLE GAPS, HOLES, OR DEFORMITIES.
 - ALL PLANTS SHALL BE FREE FROM BROKEN OR DEAD BRANCHES.
 - ALL PLANTS SHALL HAVE HEAVY, HEALTHY BRANCHING AND LEAFING.
 - CONIFEROUS TREES SHALL HAVE AN ESTABLISHED MAIN LEADER AND A HEIGHT TO WIDTH RATIO OF NO LESS THAN 5:3.
7. PLANTS TO MEET AMERICAN STANDARD FOR NURSERY STOCK (ANSI Z60.1-2004 OR MOST CURRENT VERSION) REQUIREMENTS FOR SIZE AND TYPE SPECIFIED.
8. PLANTS TO BE INSTALLED AS PER MNLNA & ANSI STANDARD PLANTING PRACTICES.
9. PLANTS SHALL BE IMMEDIATELY PLANTED UPON ARRIVAL AT SITE. PROPERLY HEEL-IN MATERIALS IF NECESSARY; TEMPORARY ONLY.
10. PRIOR TO PLANTING, FIELD VERIFY THAT THE ROOT COLLAR/ROOT FLAIR IS LOCATED AT THE TOP OF THE BALLED & BURLAP TREE. IF THIS IS NOT THE CASE, SOIL SHALL BE REMOVED DOWN TO THE ROOT COLLAR/ROOT FLAIR. WHEN THE BALLED & BURLAP TREE IS PLANTED, THE ROOT COLLAR/ROOT FLAIR SHALL BE EVEN OR SLIGHTLY ABOVE FINISHED GRADE.
11. REMOVE POT ON POTTED PLANTS; SPLIT AND BREAK APART PEAT POTS.
12. PRUNE PLANTS AS NECESSARY - PER STANDARD NURSERY PRACTICE AND TO CORRECT POOR BRANCHING OF EXISTING AND PROPOSED TREES.
13. THE NEED FOR SOIL AMENDMENTS SHALL BE DETERMINED UPON SITE SOIL CONDITIONS PRIOR TO PLANTING. LANDSCAPE CONTRACTOR SHALL NOTIFY OWNER FOR THE NEED OF ANY SOIL AMENDMENTS.
14. BACKFILL SOIL AND TOPSOIL TO BE EXISTING TOP SOIL FROM SITE FREE OF ROOTS, ROCKS LARGER THAN ONE INCH, SUBSOIL DEBRIS, AND LARGE WEEDS UNLESS SPECIFIED OTHERWISE. MINIMUM 12" DEPTH TOPSOIL FOR TREE, SHRUBS, AND PERENNIALS.
15. PROVIDE MULCH FOR ALL TREE AND SHRUB PLANTINGS PER DETAIL. MULCH TO BE SHREDDED HARDWOOD AND FREE OF DELETERIOUS MATERIAL. MULCH 3" DIAMETER RING AROUND ALL TREES AND SHRUBS TO A DEPTH OF 4". KEEP MULCH OFF TRUNK.
16. CONTRACTOR SHALL PROVIDE NECESSARY WATERING OF PLANT MATERIALS UNTIL THE PLANT IS FULLY ESTABLISHED OR IRRIGATION SYSTEM IS OPERATIONAL. OWNER WILL NOT PROVIDE WATER FOR CONTRACTOR.
17. REPAIR, REPLACE, OR PROVIDE SOD/SEED AS REQUIRED FOR ANY ROADWAY BOULEVARD AREAS ADJACENT TO THE SITE DISTURBED DURING CONSTRUCTION.
18. REPAIR ALL DAMAGE TO PROPERTY FROM PLANTING OPERATIONS AT NO COST TO OWNER.

PREPARED FOR:



8400 Normandale Lake Blvd, Suite 1200
 Bloomington, MN 55347

REVISIONS:

#	DATE	COMMENT	BY	CHK	APR
A	03/03/2025	Permit Plans	AW	BV	BV
B	03/12/2025	Permit Plans	AW	BV	BV
C	03/28/2025	Permit Plans with BESS	AW	BV	BV
D	9/29/2025	Permit Plans with BESS	AW	BV	BV

Lake Charlotte Solar Project
 Martin County, Minnesota

Landscape Screening Notes & Details

ISSUED FOR PERMIT
 NOT FOR CONSTRUCTION

DATE: 09/29/2025
 SHEET: L100
 REV: D

**Lake Charlotte Solar Facility and Battery Energy Storage System
MPUC Docket Nos. IP-7159/GS-25-206 & IP-7159/ESS-25-205**

Visual Simulations

February 2026



Visual Simulation Locations Map
Lake Charlotte Solar and BESS Projects
Martin County, MN

- BESS Facility
- Solar Array
- Project Substation
- Project Boundary

Not for construction use

Key Observation Point (KOP) 1 – 170th Street, Facing South - Existing View



KOP 1 – 170th Street, Facing South – Visual Simulation



KOP 2 – 210th Avenue, Facing Southwest – Existing View



KOP 2 – 210th Avenue, Facing Southwest – Visual Simulation



Lake Charlotte Solar Facility and Battery Energy Storage System
MPUC Docket Nos. IP-7159/GS-25-206 and IP-7159/ESS-25-205

KOP 3 – Charlotte Oak Drive, Facing Northeast – Existing View



KOP 3 – Charlotte Oak Drive, Facing Northeast – Visual Simulation



KOP 4 – State Highway 15, Facing North/Northeast – Existing View



KOP 4 – State Highway 15, Facing North/Northeast – Visual Simulation



Lake Charlotte Solar Facility and Battery Energy Storage System
MPUC Docket Nos. IP-7159/GS-25-206 and IP-7159/ESS-25-205

July 29, 2025

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

RE: Lake Charlotte Solar and Battery Storage Project
Rutland Twp, Martin County
SHPO Number: 2025-0667

Dear Adam Holven:

Thank you for continuing consultation on the above referenced project. We understand that this project will require a Minnesota Public Utilities Commission site permit and therefore the submitted information has been reviewed pursuant to the responsibilities given the State Historic Preservation Office by the Minnesota Historic Sites Act (M.S. 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 (M.S. 138.40).

According to previous correspondence on this project, the proposed Solar and Battery Storage Project will include:

- Solar modules, inverters, and racking
- Fencing
- Access roads
- Laydown areas
- Operations and Maintenance (O&M) building
- Substation facility and switchyard
- On-site underground electrical collection lines
- Up to 2 weather stations
- Battery Energy Storage Systems (BESS)

We have reviewed the submitted report, *Phase I Archaeological Investigation, Lake Charlotte Solar and Battery Storage Project, Martin County, Minnesota* (June 12, 2025) as prepared by Tetra Tech. According to the report, eight (8) newly identified archaeological sites are located within the proposed project area, sites **21MR0111**, **21MR0112**, **21MR0113**, **21MR0114**, **21MR0115**, **21MR0116**, **21MR0117**, and **21MR0118**. Site **21MR0111** has not been evaluated to determine its eligibility for listing in the National Register or Historic Places (NRHP) and was recommended for avoidance. We recommend subsurface testing to determine the presence of intact subsurface archaeological features within site 21MR0111. If subsurface testing cannot be conducted, we agree that this site should be avoided. The remaining seven (7) sites, sites **21MR0112**, **21MR0113**, **21MR0114**, **21MR0115**, **21MR0116**, **21MR0117**, and **21MR0118** appear to have been identified based on a pedestrian survey followed by shovel testing within the area of the surface finds, or in the case of isolated finds, a five-meter buffer. All of these sites are relatively close to each other along the shore of a lake, which we understand from archaeological research in the

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state is typically the setting of habitation sites that are larger and may be more significant than individual sparse lithic scatters and isolated findspots. Therefore, we recommend subsurface testing along the shore of the lake to appropriately delineate the boundaries of these sites. If this additional subsurface testing cannot be completed, we recommend grouping these sites and avoiding all of them and the areas between them.

Based on the documentation provided, we agree that there are no properties listed in the National or State Registers of Historic Places, or within the Historic Sites Network, located within the proposed project area.

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 in order to define an appropriate area of potential effects for the federal undertaking as well as the necessary historic property identification and evaluation efforts required for a federal review. 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.

We look forward to continuing consultation on this project. If you have any general questions regarding our review of this project, please contact me at kelly.graggjohnson@state.mn.us. For questions regarding archaeology, please contact Lucy Harrington, Environmental Review Archaeologist, at lucy.harrington@state.mn.us.

Sincerely,

Kelly Gragg-Johnson

Kelly Gragg-Johnson
Environmental Review Specialist