BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

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

MPUC Docket No. IP-7132/GS-24-215
OAH Docket No. 71-2500-40396

DIRECT TESTIMONY OF BRIE ANDERSON
ON BEHALF OF CONEFLOWER ENERGY, LLC

April 11, 2025

I. INTRODUCTION AND QUALIFICATIONS

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

A. My name is Brie Anderson. I am the Senior Director of Project Permitting at Apex Clean Energy. My business address is 8665 Hudson Boulevard North, Suite 200, Lake Elmo, MN 55042.

Q. Please briefly describe your educational background and professional experience.

A. I have a bachelor's degree in Ecology and Field Biology and a master's degree in Geographic Information Systems for Natural Resources. I've spent my 18-year professional career permitting energy projects across the nation; the first 14 years as a consultant and the last four at Apex Clean Energy.

Q. For whom are you testifying?

A. I am providing testimony on behalf of Coneflower Energy, LLC (Coneflower Solar or the Applicant), the applicant in this proceeding.

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

A. My role is to lead the Site Permit Application process – working with the Coneflower Solar project team and external consultants to ensure the Project design and the Application meets the Minnesota rules and regulations. This includes agency coordination, supporting studies, Project design, and Application development.

II. PURPOSE OF TESTIMONY

Q. What is the purpose of your Direct Testimony?

A. On August 19, 2024, Coneflower Solar submitted a Site Permit Application for the Coneflower Solar Project (the Application). The purpose of my testimony is to: (1) provide an overview of the Project; (2) provide updates on the Project; (3) discuss the local employment and economic benefits; (4) discuss Coneflower Solar's

coordination with the Minnesota State Historic Preservation Office (SHPO) and interested tribal nations; (5) provide updates on consultation with the Minnesota Department of Transportation (MnDOT); (6) provide a response to the Minnesota Department of Natural Resources (DNR)'s scoping comments regarding potential measures to avoid or minimize impacts from construction of the Project; and (7) provide comments on the Environmental Assessment (EA) and Draft Site Permit (DSP).

Q. What schedules are attached to your Direct Testimony?

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

- **SCHEDULE A**: Statement of Qualifications
- **SCHEDULE B**: Map of Blowing Snow Control Panel Setback
- **SCHEDULE C**: MnDOT Acknowledgement of Coneflower Panel Setbacks
- **SCHEDULE D**: Map of Fence Setbacks to Minimize Vehicle Collisions with Wildlife

III. PROJECT OVERVIEW

Q. Please provide a summary of the Project, including the proposed location and proposed site.

A. Coneflower Solar proposes to construct and operate an up to 235 megawatt (MW) alternating current photovoltaic solar energy generating facility and associated infrastructure in Lyon County, Minnesota (the Project). Coneflower Solar has designed this Project to have flexibility in how it provides electricity to the grid with two potential connection scenarios: the Midcontinent Independent System Operator (MISO) Scenario and the Garvin Scenario. In the MISO Scenario, Coneflower Solar will construct a new project substation in the north-central portion of the site and interconnect to the existing Lyon County to Lake Yankton 115 kilovolt (kV) transmission line via an Xcel Energy switching station and short (up to 500 feet) 115 kV transmission line. In the Garvin Scenario, Coneflower Solar will construct a new project substation in the eastern portion of the site and

interconnect via a short (up to 1 mile) 345 kV transmission line to the proposed Garvin Substation from Xcel Energy's proposed Minnesota Energy Connection (MNEC) transmission project. The Garvin Scenario will require a route permit from the Minnesota Public Utilities Commission (Commission) and is dependent upon Commission approval of the Garvin Substation in the MNEC project (Docket TL-22-132). Coneflower Solar will submit a Route Permit application, if needed for the Garvin Scenario, at a later date.[1]

Q. Why did Coneflower Solar choose the Project Area as presented in the Application to build the Project?

A. The Project Area was chosen for its proximity to each point of interconnection (POI), strong solar resource, supportive landowners, and available land not currently participating in other energy projects.[2]

IV. PROJECT UPDATES

Q. Have there been any updates in how the Project will interconnect to the electric grid?

A. As stated in the Application, the Project has been designed and sited to have flexibility regarding how it provides electricity to the regional electrical grid. Specifically, the Project can provide electricity to the grid in two different ways. First, it could connect to the existing Lyon County to Lake Yankton 115- kV transmission line (MISO Scenario). Second, the Project could connect with Xcel Energy's proposed Garvin Substation. That substation is the terminus of the proposed 345 kV double circuit MNEC transmission line.[3] While Coneflower Solar has not yet determined which interconnection scenario it will utilize, the

[1] *See* Coneflower Solar Project Site Permit Application at 1, 4 (Aug. 19, 2024) (eDocket No. 20248-209609-02) (Application) and Environmental Assessment at 1 (March 26, 2025) (eDocket No. 20253-216823-01) (EA).

[2] Application at 11.

[3] Application at 1.

Commission voted to approve the MNEC project, including the Garvin Substation, on April 10, 2025. A written order is forthcoming.

Q. What is the status of executing a generator interconnection agreement (GIA) for the Project?

A. The current schedule provided by MISO (published April 1, 2025) estimates that a GIA for Coneflower Solar will be executed by Spring 2026. Despite this delay, Coneflower Solar can still achieve an in-service date by the end of 2027.

Q. What is the status of executing a power purchase agreement (PPA) for the Project?

A. The Project has not yet executed a PPA or any other off-take agreements. However, the Project is intentionally and uniquely sited to capitalize on a variety of off-take scenarios. With a MISO queue position along the existing Lyon County to Lake Yankton 115 kV transmission line, Coneflower Solar could enter into an agreement with the interconnection utility (Xcel Energy), any MISO member, or with a Commercial and Industrial (C&I) customer. The Project is also positioned within one-half mile of Xcel Energy's proposed Garvin Substation, the terminus of the proposed MNEC's double-circuit 345 kV transmission line, which could result in a different type of agreement with Xcel Energy. In either case, Coneflower Solar is proposing to construct this Project to sell energy, capacity and renewable energy credits, either bundled or unbundled, to one or more electric utilities and/or C&I customers.[4]

Q. Has the anticipated schedule for the construction and in-service of the Project changed from what was contemplated in the Application?

[4] Application at 3.

A. Coneflower Solar still anticipates the Project will begin commercial operation by the end of 2027.[5]

Q. Have there been any other updates related to the Project since Coneflower Solar filed the Application?

A. Based on coordination with MnDOT, Coneflower Solar has made two design changes since filing the Application. First, as detailed in Applicant's Reply Comments for Completeness, Coneflower Solar committed to utilizing existing driveways or field entrances off of US Highway 14 such that no new driveways are required.[6] Second, Coneflower Solar later engaged in productive discussions with the MnDOT to assist the agency with blowing snow mitigation along US Highway 14. As I discuss in more detail below, this discussion resulted in modest modifications to the Project design that are intended to help minimize blowing and drifting snow along the highway through the Project footprint.

V. LOCAL EMPLOYMENT & ECONOMIC BENEFITS

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

A. Yes. Coneflower Solar will provide significant socioeconomic benefits to local, union construction workers. Coneflower Solar anticipates supporting up to 200 temporary construction and installation jobs for this project and following the prevailing wage and apprenticeship rules in place under the United States Inflation Reduction Act.[7] Coneflower Solar estimates average annual solar energy production and property tax revenue of approximately $477,225 for Lyon County

[5] *See* Application at 7 and Environmental Assessment (EA) at 39, 40 (March 26, 2025) (eDocket No. 20253-216823-01) (EA).

[6] Coneflower Solar – Completeness Reply Comments at 5 (Sept. 18, 2024) (eDocket No. 20249-210296-01, 20249-210296-02, 20249-210296-03, and 20249-210296-04).

[7] EA at 85.

and approximately $119,306 for Custer Township.[8] In addition, lease and easement payments paid to the landowners (approximately $3.4 million annually and $100.9 million over 30 years) will offset potential financial losses associated with removing a portion of their land from agricultural production.[9]

Q. What are Coneflower Solar's commitments regarding the workforce that will be needed for construction of the Project?

A. Coneflower Solar anticipates the Project will require up to 200 laborers during the construction and installation phases, and 2-3 long-term personnel during the operations phase. Coneflower Solar will prioritize construction contractor and supplier bids that utilize local, union construction employees to the greatest extent feasible, and expects the selected contractor to work with unions and stakeholders to create a workforce and hiring plan that will maximize local economic benefits. Coneflower Solar notes that it may be necessary to import specialized labor from non-local areas in Minnesota or other states, as the short duration of the construction phase precludes special training of local labor.[10]

VI. COORDINATION WITH SHPO & INTERESTED TRIBAL NATIONS

Q. Do you have any updates regarding SHPO coordination since the Application was filed?

A. Yes. On September 5, 2024, Coneflower Solar received SHPO's comments on the revised cultural resources survey report, Phase I Reconnaissance Survey of the Coneflower Solar Project, Lyon County, Minnesota (July 29, 2024) as prepared by Impact 7G (Phase I Survey Report). SHPO agreed that the Project will not adversely impact cultural and historic resources but also deferred to the Upper Sioux Community traditional cultural specialists and the Tribal Historic

[8] EA at 87; Application at 71.

[9] Application at 71.

[10] EA at 85.

Preservation Office to determine the appropriate treatment of two locations, designated TS 1 and TS 2. The Phase I Survey Report and SHPO's concurrence letter were included as Attachment A to Coneflower Solar's reply comments on the completeness of the Application.[11]

Q. Has Coneflower Solar received additional correspondence from interested tribal nations?

A. No.

VII. MNDOT CONSULTATION UPDATES

Q. Have you reviewed MnDOT's scoping comments from December 4, 2024?

A. Yes.

Q. Please summarize MnDOT's comments regarding blowing snow control.

A. As described below, Coneflower Solar has addressed MnDOT's concerns. In its scoping comments, MnDOT expressed concern over a blowing snow issue with the proposed Project. Specifically, MnDOT commented that the "proposed Project boundary is located on a high severity ranked snow trap which may trigger a specific set of human and environmental impacts if removal or alterations occur."[12] Additionally, MnDOT pointed out that there is a "snow fence installation planned within the Project area."[13] MnDOT requested that Coneflower Solar clarify whether the proposed Project would adversely impact these resources. MnDOT also stated that Coneflower Solar "must work with MnDOT to find a blowing snow control solution if impacts occur, and coordinate timing of the respective Projects."[14]

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[11] Coneflower Solar – Completeness Reply Comments (Sept. 18, 2024) (eDocket No. 20249-210296-01, 20249-210296-02, 20249-210296-03, and 20249-210296-04).

[12] MnDOT Scoping Comments at 2 (Dec. 4, 2024) (eDocket No. 202412-212702-01).

[13] MnDOT Scoping Comments at 2 (Dec. 4, 2024) (eDocket No. 202412-212702-01).

[14] MnDOT Scoping Comments at 2 (Dec. 4, 2024) (eDocket No. 202412-212702-01).

Q. Have you engaged in any consultation with MnDOT regarding its comments on blowing snow control?

A. Yes.

Q. Please describe your consultation with MnDOT.

A. On January 23, 2025, Coneflower Solar met with representatives from MnDOT to understand the blowing snow issue raised in scoping comments. Coneflower Solar followed up with MnDOT's Blowing Snow Control Shared Services Program Supervisor, Dan Gullickson, via email regarding formulating a blowing snow control modeling exercise of the state trunk highway corridor in the Project area. MnDOT requested information on the Project's solar panel dimensions, setbacks from road right-of-way, similar solar projects in the region, and GIS shapefiles. MnDOT sent Coneflower Solar a copy of its proposed solar panel setbacks to prevent snow drifts from blocking US Highway 14 adjacent to the proposed Project. These setback distances varied based on the topography, road profile, and road ditch cross sections. MnDOT stated that by adhering to their proposed panel setbacks, the Project can help reduce MnDOT's mechanical snow removal operation efforts while also helping improve the winter driving safety/mobility during blowing snow events that average between 415 to 519 hours per year. Coneflower Solar reviewed and accepted MnDOT's Blowing Snow Control panel setbacks on both the north and south sides of US Highway 14. The agreed upon Blowing Snow Control Panel Setback for the Project is included as **Schedule B**. A copy of Coneflower Solar's and MnDOT's correspondence is included as **Schedule C**.

Q. Have you reviewed the section of the EA published on March 26, 2025 for the Project pertaining to Public Safety and Emergency Services?

A. Yes.

Q. Do you have any comments pertaining to the EA's analysis of impacts to Public Safety and Emergency Services?

A. Yes. Section 4.4.2 of the EA states that "[t]he Project's proposed boundary is located on a high severity ranked snow trap that runs along US Highway 14 through the center of the Project. The proximity of the project solar panels to the snow trap could result in a dangerous buildup of snow drifts close to the road. Snow drifts could create a significant blowing snow concern, leading to reductions in visibility and increased potential for collisions or accidents. In addition, snow buildup adjacent to the road would require MnDOT to increase their mechanical snow removal operation efforts during winter."[15] As discussed above, MnDOT recognizes the area along US Highway 14 as an existing dangerous snowdrift area.[16] As evident in MnDOT's scoping comments and Coneflower Solar's correspondence with MnDOT in **Schedule C**, the Project will not cause snowdrift concerns but will actually help reduce MnDOT's mechanical snow removal operation efforts while also helping improve the winter driving safety/mobility during blowing snow events.

VIII. RESPONSE TO DNR SCOPING COMMENTS

Q. Have you reviewed the DNR's scoping comments from December 4, 2024?

A. Yes.

Q. Please summarize DNR's comments regarding potential environmental and wildlife impacts.

A. In its scoping comments, DNR offered comments on fencing, setbacks, lighting, dust, and wildlife friendly erosion control as follows:

- Fencing. DNR recommended that the Project's agricultural woven wire fence reach a total minimum height of 10 feet to prevent white-tailed deer and other large wildlife from entering the facility.

[15] EA at 97.

[16] *See* MnDOT Scoping Comments (Dec. 4, 2024) (eDocket No. 202412-212702-01).

- Setbacks. DNR recommended a minimum setback distance of 50 feet between the perimeter of the Project and a road right-of-way. DNR requested that the Project include appropriate setbacks between the Project Footprint and the DNR Wildlife Management Areas (WMA) to protect wildlife and their travel corridors.
- Lighting. DNR requested that Coneflower Solar use shielded lighting to avoid or minimize potential impacts related to illumination. DNR also recommended choosing products that emit the lowest levels of blue hue, backlight, and glare possible.
- Dust control. DNR advised against using products that contain chloride as a dust suppression agent.
- Wildlife Friendly Erosion Control. DNR recommended that erosion control blankets be limited to "bio-netting" or "natural netting" types.
- Vegetation Management Plan (VMP). DNR recommended continued coordination with the Vegetation Management Plan Working Group (VMPWG) to refine the Project's VMP. DNR advised against planting non-native seed mixes because they can spread throughout the Project site and defeat the purpose of using adjacent native seed mixes.[17]

Q. What is your response to DNR's comments and recommendations?

A. Coneflower Solar agrees with and will incorporate DNR's recommendations related to lighting, dust control, wildlife friendly erosion control, and the VMP. Coneflower Solar does not agree with DNR's fencing or road setback recommendations.

Q. What are Coneflower Solar's plans with respect to security fencing?

A. As stated in its Application, Coneflower Solar plans to construct a 6-foot chain link fence, topped with one foot of barbed wire, around the Project substation to comply

[17] DNR Scoping Comments (Dec. 4, 2024) (eDocket No. 202412-212709-01).

with the National Electric Code.[18] Fencing around the perimeter of the Project facilities will consist of an agricultural woven wire fence and will extend approximately seven feet above grade. Barbed wire will not be used around the perimeter of the Project, and instead one foot of three to four strands of smooth wire will be used for a total height of 8-feet.[19] Coneflower Solar will continue to work with EERA and DNR on a final fence plan for this site but cannot agree to DNR's recommended 10-foot fence height. The additional fence height would negatively impact the Project's aesthetics by making the fence a more prominent feature on the landscape, increase project costs, while making it only marginally more likely to keep white-tail deer away from the Project facilities.

Q. What are Coneflower Solar's concerns with DNR's recommended 50-foot road setback for wildlife corridors?

A. Applying a minimum setback distance of 50 feet between the perimeter (i.e., fence) of the Project and a road right-of-way is overbroad to achieve the stated goal of protecting wildlife and would negatively impact efficient energy production. As noted above, Coneflower Solar has already agreed to set back Project facilities along US Highway 14 in accordance with MnDOT's Blowing Snow Control recommendations. This will have the dual benefit of also resulting in increased wildlife corridors along the most heavily travelled roadway in the Project area.

A minimum 50-foot setback from all roadways is overbroad. Many of these roadways are gravel and lightly travelled, making the risks to wildlife and the traveling public small, especially given the existing fence lines and farmsteads that border these roads today. Moreover, in many parts of the Project area, Project facilities are only located on one side of the road, leaving expansive areas for wildlife travel.

[18] Application at 19-20.

[19] Application at 20.

Coneflower Solar proposes to limit the application of DNR's minimum 50-foot road setback to paved roads within the Project Area where Project facilities are located on both sides of the road. This will continue to allow efficient siting of the Project and accommodate DNR's proposal in areas where Project facilities are on both sides of paved roadways. See **Schedule D** for a map showing the areas where the fencing setback would be applied.

IX. COMMENTS ON THE EA AND DSP

Q. Have you reviewed the EA prepared by the Minnesota Department of Commerce Energy Environmental Review and Analysis (EERA) unit for the Project?

A. Yes, EERA filed the EA on March 24, 2025. Included with the EA was a DSP prepared by EERA. I have reviewed both the EA and the DSP and offer the following comments.

Q. What are your comments on the EA?

A. Coneflower Solar has a limited number of corrections and clarifications related to the EA. They are as follows:

- In Section 2.1.4 of the EA, it states that the Project has an "in-service goal of 2030."[20] As stated in the Application, the anticipated commercial operation of the Project is by year-end 2027.[21]

- In Section 2.1.4 of the EA, it states that "[t]he VMP has been designed to help Coneflower Solar meet Minnesota's Habitat Friendly Solar Standard and meet the requirements set by the Minnesota Board of Water and Soil Resources (BWSR) in its pollinator guidance documents."[22] As stated in the Application,

[20] EA at 27.

[21] *See* Application at 7.

[22] EA at 35.

Coneflower Solar is not planning to meet the standard for pollinator friendly but rather to meet the goals and objective set forth in Section 2.0 of Coneflower Solar's VMP.

- In Section 4.3.1 of the EA, it states that the Project will have "three permanent weather stations."[23] As stated in the Application, the Project will have five weather stations.[24]

- In Section 4.6 of the EA, it states that "Coneflower Solar has placed a 100-foot buffer around the four Traditional Cultural Properties..."[25] As stated in the Application, Coneflower Solar will place a 100-foot buffer around the two discrete areas that contain the four Traditional Cultural Properties,[26] not the four properties themselves.

Section 4.7.8 of the EA states that "[t]he [United States Fish and Wildlife Service (USFWS)] will coordinate appropriate mitigation measures for bald eagles for the [P]roject. Mitigation measure may include setbacks from nests, timing restriction for construction activities, and possibly seeking a USFWS permit for removal of a nest."[27] As stated in the Application, no eagle nests were found within the Project area or the 0.25 mile buffer.[28] Coneflower Solar also anticipates that no or minimal tree clearing will be required for the Project.[29] Nevertheless, Coneflower Solar will coordinate with the USFWS as needed.

[23] EA at 58.

[24] Application at 5.

[25] EA at 111.

[26] Application at 77.

[27] EA at 151.

[28] Application at 100, 102-103.

[29] Application at 104.

- Section 4.12.2 of the EA provides a discussion of impacts to cultural values that appears to be largely based on the cumulative effects of the Project, the MNEC project, and the Lyon County Station (LCS) project.[30] The EA states that residents of the city of Garvin will likely experience significant and unavoidable impacts to cultural values.[31] Coneflower Solar does not agree that the Project would contribute to significant impacts to the cultural values of the residents of Garvin. As stated in the Application, the Project is located outside of municipal areas, would not impact cultural or historic sites, and would not impact public participation in regional community events.[32] Moreover, there are a number of positive impacts of the Project for the local community, including that the Project will not create disproportionate or adverse impacts to low-income or minority populations because the percentage of low-income and minority residents in the Project area is not meaningfully greater than Lyon County, the region of comparison;[33] the Project will not disrupt local communities or businesses;[34] the economic benefits of the Project are anticipated to be positive;[35] the use of local workers is expected to have significant positive benefits not just through employment on this Project but also by increasing local spending activities and building skills for future renewable energy employment opportunities;[36] and the Project is expected to result in a long-term reduction in greenhouse gas emissions.[37]

Q. Do you have any comments on the DSP?

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[30] EA at 166.

[31] EA at 166.

[32] Application at 47.

[33] EA at 90.

[34] EA at 84.

[35] EA at 84.

[36] EA at 86.

[37] EA at 155.

A. Yes. Coneflower Solar requests modifications to conditions in the following sections of the DSP: Section 2, Section 5.9, Section 5.10, and Section 5.16.

Q. What modification is Coneflower Solar requesting to Section 2 of the DSP?

A. Coneflower Solar requests Section 2 be corrected to refer to Lyon County instead of Renville County as follows:

County	Township Name	Township	Range	Section
~~Renville~~Lyon	Custer	109N	41W	7, 16-22, 27

Q. What modification is Coneflower Solar requesting to Section 5.9 of the DSP?

A. Coneflower Solar proposes revising Section 5.9 of the DSP to account for the Blowing Snow Control plan that Coneflower Solar developed with MnDOT and to limit the application of the fencing setbacks to the paved roads in the Project area with fencing on both sides of the road. Gravel roads in the Project area have inherently less risk because of reduced speeds for safe travel. Accordingly, Coneflower Solar proposes the following revisions:

> **5.9 Fencing ROW setbacks**
>
> The Permittee shall apply a minimum setback of 50 feet from the perimeter fence to paved ~~all~~ road ROWs on both sides of County Road 7 where Project Facilities are sited on both sides of the road to reduce the risk of vehicle collisions with wildlife.

Schedule D includes a map showing the areas where the road setback would be applied.

Q. What modification is Coneflower Solar requesting to Section 5.10 of the DSP?

A. Coneflower Solar proposes revising section 5.10 of the DSP to require the use of switch-controlled down-lit lighting, as mentioned in the Application,[38] instead of motion-activated down-lit lighting for the Project. Coneflower Solar's operations and maintenance team will switch the lights on when needed at the site, rather than rely on motion-activated lighting, which can turn on needlessly due to passing animals. Accordingly, Coneflower Solar proposes the following revisions:

> **5.10 Wildlife Friendly Lighting**
> The Permittee shall use ~~motion activated,~~switch-controlled, down-lit lighting around and within the Project.

Q. What modification is Coneflower Solar requesting to Section 5.16 of the DSP?

A. Coneflower Solar proposes removing section 5.16 of the DSP in its entirety. Coneflower Solar does not believe that a Community Impact Mitigation Agreement is necessary for the Project, as Coneflower Solar does not anticipate negative impacts to the City of Garvin, its residents, or cultural values. Garvin is not an area of environmental justice concern;[39] the Project will not create disproportionate or adverse impacts to low-income or minority populations because the percentage of low-income and minority residents in the Project area is not meaningfully greater than Lyon County, the region of comparison;[40] the Project will not disrupt local communities or businesses;[41] the Project abides by Lyon County Zoning Ordinance setbacks and other required setbacks,[42] there is a raised railroad right-of-way[43] and existing vegetation[44] between the Project and

[38] *See* Application at 47; *see also* EA at 34.

[39] *See* EA at 89-90.

[40] EA at 90.

[41] EA at 84.

[42] *See* EA at 73 and 74.

[43] *See* EA at 53 and 79.

[44] *See* EA at 134.

the city of Garvin, and the economic benefits of the Project are anticipated to be positive.[45] To the extent that EERA's recommendations are based on the cumulative impact of Coneflower Solar, MNEC and LCS, Coneflower Solar submits that it would be inappropriate for the Project, with the positive impacts noted above, to bear the brunt of this requirement, when no similar requirement was made of the MNEC project, and the LCS project has yet to even file an application with the Commission.

X. CONCLUSION

Q. Does this conclude your Direct Testimony?

A. Yes.

[45] EA at 84.

BRIE L. ANDERSON

Professional Experience

Apex Clean Energy, Minneapolis, MN

Senior Director of Permitting – Jan 2025 - Present

Senior Permitting Manager/Director of Permitting – 2021 – 2024

Responsible for leading discretionary permitting of wind, solar, and transmission projects across the national portfolio. Leads project teams through the discretionary permitting process to ensure land use permit applications comply with all applicable ordinances and requirements for utility scale wind and solar energy projects. Coordinates and collaborates closely with various internal (e.g., legal, financing, development, environmental, land, engineering, construction) and external (e.g., outside counsel; sound/noise, shadow flicker, wildlife, property values, and economics) subject matter expert teams to ensure discretionary permitting requirements are met. Provides expert witness testimony as part of land-use permit meetings and hearings.

Merjent, Inc, Minneapolis, MN

Senior Project Manager – 2014 - 2021

Senior Project Manager for a leading environmental consulting firm. Managed and led the permit strategy and development of utility-scale wind and solar and associated gen-tie transmission lines throughout the country. Provided federal, state, and local permitting support for renewable energy projects; and provided expert witness testimony on behalf of clients on the environmental analyses included in permit applications.

URS Corporation, Minneapolis, MN

Senior Environmental Scientist – 2013 - 2014

Senior Environmental Scientist providing permitting support to various energy industries including utility-scale wind, electric transmission, and oil and gas. Worked with project teams to obtain federal, state, and local permits; specializing in threatened and endangered species evaluations and agency consultation. Conducted natural resource inventories and monitoring; and performed analysis and maintained and mapped spatial data utilizing Geographic Information Systems (GIS).

Westwood Professional Services, Eden Prairie, MN

Avian Field Ecologist/Environmental Scientist/GIS Specialist – 2008 – 2013

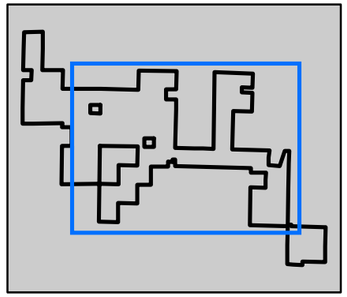
Assessed the effects of proposed transmission, wind, and solar development on natural resources such as public lands and waters; cultural resources; native plant communities and sites of biodiversity significance; and federal and state threatened and endangered species and their habitats. Authored technical environmental reports related to the siting of transmission, wind, and solar

projects. Prepared recommendations for avoiding/mitigating impacts to natural resources based on field studies, agency coordination, and background research. Demonstrated intimate knowledge of the USFWS Land-Based Wind Energy Guidelines framework, from desktop landscape level analyses to project-specific field studies. Designed and conducted avian field studies throughout the country.

Education

St. Mary's University of Minnesota, Minneapolis, MN
M.S., Geographical Information Systems for Natural Resources, 2015

St. Cloud State University, St. Cloud, MN
B.S., Ecology and Field Biology, 2006



Coneflower Energy, LLC
Lyon County, MN
Blowing Snow Control Setback

- Project Area
- Underground Collection
- Blowing Snow Control Setback
- Laydown Yard
- Fenced Area
- Access Road
- Highway
- Street

All facilities and features on this map are preliminary and subject to final Engineering and Environmental surveys.

Date: 3/13/2025 *CONFIDENTIAL*

Coordinate System: NAD 1983 StatePlane Minnesota South FIPS 2203 Feet
Projection: Lambert Conformal Conic
Datum: North American 1983
Units: Foot US

APEX CLEAN ENERGY

Exhibit CE- ____, Anderson Direct, Schedule B

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0 500 1,000 1,500 2,000 Feet

Document Path: Y:\Solar_Projects\CFE_Coneflower\Energy\GIS\MXD\Permitting\MNDOT\CFE_MNDOT_Overview_Blowing_Snow_Control.mxd

Outlook

RE: Coneflower Solar Project Blowing Snow Control Analysis

From Gullickson, Daniel (DOT) <daniel.gullickson@state.mn.us>
Date Tue 3/18/2025 4:02 PM
To Brie Anderson <brie.anderson@apexcleanenergy.com>; Kotch Egstad, Stacy (DOT) <stacy.kotch@state.mn.us>; Sean Stocker <sean.stocker@apexcleanenergy.com>
Cc Ismail, Iqra (DOT) <Iqra.Ismail@state.mn.us>; Wilts, Brent (DOT) <brent.wilts@state.mn.us>

Brie and all,
Thanks for your acceptance of our recommended panel setbacks.

Sincerely,
Dan Gullickson

From: Brie Anderson <brie.anderson@apexcleanenergy.com>
Sent: Wednesday, March 12, 2025 3:41 PM
To: Gullickson, Daniel (DOT) <daniel.gullickson@state.mn.us>; Kotch Egstad, Stacy (DOT) <stacy.kotch@state.mn.us>; Sean Stocker <sean.stocker@apexcleanenergy.com>
Cc: Ismail, Iqra (DOT) <Iqra.Ismail@state.mn.us>; Wilts, Brent (DOT) <brent.wilts@state.mn.us>
Subject: Re: Coneflower Solar Project Blowing Snow Control Analysis

Hi Dan and team,

Coneflower Solar has reviewed the MnDOT Blowing Snow Control panel setback on both the north and south sides of US Highway 14. Coneflower will accommodate this panel setback and incorporate this commitment into its final design. We appreciate working with your team and the coordination related to this matter.

Sincerely,
Brie

BRIE ANDERSON
Senior Director of Project Permitting

Apex Clean Energy

120 Garrett Street, Suite 700, Charlottesville, VA 22902

cell: 612-501-2801 | fax: 434-220-3712

brie.anderson@apexcleanenergy.com | www.apexcleanenergy.com

APEX CLEAN ENERGY

Safety • Integrity • Entrepreneurship • Sustainability • Professionalism

From: Gullickson, Daniel (DOT) <daniel.gullickson@state.mn.us>
Sent: Tuesday, March 4, 2025 4:23 PM
To: Brie Anderson <brie.anderson@apexcleanenergy.com>; Kotch Egstad, Stacy (DOT) <stacy.kotch@state.mn.us>; Sean Stocker <sean.stocker@apexcleanenergy.com>
Cc: Ismail, Iqra (DOT) <Iqra.Ismail@state.mn.us>; Wilts, Brent (DOT) <brent.wilts@state.mn.us>
Subject: RE: Coneflower Solar Project Blowing Snow Control Analysis

Brie and All,

Attached are a KMZ file and GIS shapefile with our recommended solar panel offsets to prevent snow drifts from blocking US Highway 14 adjacent to the proposed Coneflower Solar Project.

MnDOT's Blowing Snow Control Recommendation is to not locate any solar panels closer to the road than the alignments shown in the attachments.

After you get a chance to review, we can schedule a future meeting to go over MnDOT's methodology used to establish these alignments. By adhering to these alignments, the Coneflower Solar Project can have the added value of reducing MnDOT's mechanical snow removal operation efforts while helping improve the winter driving safety/ mobility during blowing snow events that average between 415 to 519 hours per year.

Sincerely,

Dan Gullickson

From: Brie Anderson <brie.anderson@apexcleanenergy.com>
Sent: Thursday, February 27, 2025 8:13 AM
To: Gullickson, Daniel (DOT) <daniel.gullickson@state.mn.us>; Kotch Egstad, Stacy (DOT) <stacy.kotch@state.mn.us>; Sean Stocker <sean.stocker@apexcleanenergy.com>
Cc: Ismail, Iqra (DOT) <Iqra.Ismail@state.mn.us>; Wilts, Brent (DOT) <brent.wilts@state.mn.us>
Subject: Re: Coneflower Solar Project Blowing Snow Control Analysis

Hi Dan -

We use GIS shapefiles.

brie

BRIE ANDERSON
Senior Director of Project Permitting

Apex Clean Energy

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From: Gullickson, Daniel (DOT) <daniel.gullickson@state.mn.us>
Sent: Thursday, February 27, 2025 8:11 AM
To: Brie Anderson <brie.anderson@apexcleanenergy.com>; Kotch Egstad, Stacy (DOT) <stacy.kotch@state.mn.us>; Sean Stocker <sean.stocker@apexcleanenergy.com>
Cc: Ismail, Iqra (DOT) <Iqra.Ismail@state.mn.us>; Wilts, Brent (DOT) <brent.wilts@state.mn.us>
Subject: RE: Coneflower Solar Project Blowing Snow Control Analysis

Brie,
Does your firm use GIS shapfiles or MicroStation DGN files? We want to send you our proposed solar panel setbacks that varies based on the topography, road profile, and road ditch cross sections.

Sincerely,
Dan Gullickson

From: Brie Anderson <brie.anderson@apexcleanenergy.com>
Sent: Monday, February 24, 2025 11:27 AM
To: Kotch Egstad, Stacy (DOT) <stacy.kotch@state.mn.us>; Gullickson, Daniel (DOT) <daniel.gullickson@state.mn.us>; Sean Stocker <sean.stocker@apexcleanenergy.com>
Cc: Ismail, Iqra (DOT) <Iqra.Ismail@state.mn.us>; Wilts, Brent (DOT) <brent.wilts@state.mn.us>
Subject: Re: Coneflower Solar Project Blowing Snow Control Analysis

Sounds good, thanks Stacy!
brie

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From: Kotch Egstad, Stacy (DOT) <stacy.kotch@state.mn.us>
Sent: Monday, February 24, 2025 11:18 AM
To: Brie Anderson <brie.anderson@apexcleanenergy.com>; Gullickson, Daniel (DOT) <daniel.gullickson@state.mn.us>; Sean Stocker <sean.stocker@apexcleanenergy.com>
Cc: Ismail, Iqra (DOT) <Iqra.Ismail@state.mn.us>; Wilts, Brent (DOT) <brent.wilts@state.mn.us>
Subject: RE: Coneflower Solar Project Blowing Snow Control Analysis

Hello Brie,

I spoke with Iqra last week and the team is currently gathering open dates/times for our next meeting regarding modeling/analysis results. I'll reach out with some options as soon as I have them.

Thank you for checking in.

-Stacy

From: Brie Anderson <brie.anderson@apexcleanenergy.com>
Sent: Monday, February 24, 2025 11:08 AM
To: Gullickson, Daniel (DOT) <daniel.gullickson@state.mn.us>; Sean Stocker <sean.stocker@apexcleanenergy.com>
Cc: Ismail, Iqra (DOT) <Iqra.Ismail@state.mn.us>; Wilts, Brent (DOT) <brent.wilts@state.mn.us>; Kotch Egstad, Stacy (DOT) <stacy.kotch@state.mn.us>
Subject: Re: Coneflower Solar Project Blowing Snow Control Analysis

Hi Dan -

Circling back as it's been a month. How is your additional analysis and can we get a meeting on the books in the next two weeks?

Thanks,
brie

BRIE ANDERSON
Senior Director of Project Permitting

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brie.anderson@apexcleanenergy.com | www.apexcleanenergy.com

From: Gullickson, Daniel (DOT) <daniel.gullickson@state.mn.us>
Sent: Tuesday, February 4, 2025 2:14 PM
To: Brie Anderson <brie.anderson@apexcleanenergy.com>; Sean Stocker <sean.stocker@apexcleanenergy.com>
Cc: Ismail, Iqra (DOT) <Iqra.Ismail@state.mn.us>; Wilts, Brent (DOT) <brent.wilts@state.mn.us>; Kotch Egstad, Stacy (DOT) <stacy.kotch@state.mn.us>
Subject: RE: Coneflower Solar Project Blowing Snow Control Analysis

Hi Brie,
Thanks for answering our questions. We will be in contact after we complete our modeling.

Have a good day,

Dan

From: Brie Anderson <brie.anderson@apexcleanenergy.com>
Sent: Tuesday, February 4, 2025 12:58 PM
To: Gullickson, Daniel (DOT) <daniel.gullickson@state.mn.us>; Sean Stocker <sean.stocker@apexcleanenergy.com>
Cc: Ismail, Iqra (DOT) <Iqra.Ismail@state.mn.us>; Wilts, Brent (DOT) <brent.wilts@state.mn.us>; Kotch Egstad, Stacy (DOT) <stacy.kotch@state.mn.us>
Subject: Re: Coneflower Solar Project Blowing Snow Control Analysis

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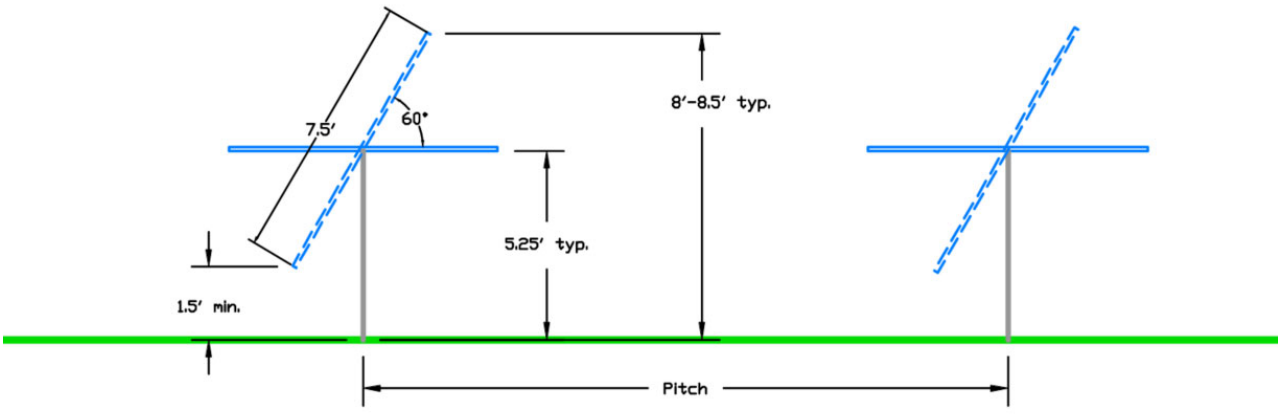
Hi Dan -

Answers to your questions in red.

Can you and the team provide your availability for a follow-up meeting the week of February 24?

- What are your solar panel dimensions? Please send us a pdf or your solar panel typical dimensions.
  - Spec sheet attached. This diagram also might help.



  -
- Will the solar panels be 25 feet from the existing highway right of way lines? Are you proposing using this same offset whether it is for a US Highway, County Highway, or Township Road?
  - Yes - the Lyon County Renewable Energy Ordinance requires that. Our Preliminary Design has panels no closer than 38' from any road right-of-way.
- Have you developed a similar solar panel project that we could visit to see whether the bottom gap of the solar panels are contributing to snow drift formation?
  - Not in the region, unfortunately.

Let us know if you need anything else,
brie

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Senior Director of Project Permitting

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From: Gullickson, Daniel (DOT) <daniel.gullickson@state.mn.us>
Sent: Tuesday, February 4, 2025 9:24 AM
To: Sean Stocker <sean.stocker@apexcleanenergy.com>; Brie Anderson <brie.anderson@apexcleanenergy.com>
Cc: Ismail, Iqra (DOT) <Iqra.Ismail@state.mn.us>; Wilts, Brent (DOT) <brent.wilts@state.mn.us>; Kotch Egstad, Stacy (DOT) <stacy.kotch@state.mn.us>
Subject: Coneflower Solar Project Blowing Snow Control Analysis

Brie and Sean,

We are doing a blowing snow control modeling exercise of the corridor.

For our blowing snow modeling exercise we need to know the following:

- What are your solar panel dimensions? Please send us a pdf or your solar panel typical dimensions.
- Will the solar panels be 25 feet from the existing highway right of way lines? Are you proposing using this same offset whether it is for a US Highway, County Highway, or Township Road?
- Have you developed a similar solar panel project that we could visit to see whether the bottom gap of the solar panels are contributing to snow drift formation?

Thanks,

Dan Gullickson

Blowing Snow Control Shared Services Program Supervisor

Operations Division

Minnesota Department of Transportation

395 John Ireland Blvd., Mail Stop 686

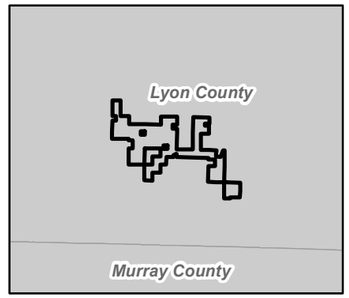
Saint Paul, MN 55155-1800

Office: 651-366-3610

Cell: 612-280-4546

Email: daniel.gullickson@state.mn.us

Exhibit CE- ____, Anderson Direct, Schedule D



Coneflower Energy, LLC
Lyon County, MN
Minimizing Vehicle Collisions with Wildlife

Road Segment to have Fence Setback from Road Right-of-Way

Fenced

All facilities and features on this map are preliminary and subject to final Engineering and Environmental surveys.

Date: 4/7/2025 *CONFIDENTIAL*

Coordinate System: NAD 1983 StatePlane Minnesota South FIPS 2203 Feet
Projection: Lambert Conformal Conic
Datum: North American 1983
Units: Foot US

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Coneflower to implement 50-foot-setback from CR7 right-of-way to fence to minimize risk of vehicle collisions with wildlife.

Coneflower to implement 50-foot-setback from US14 right-of-way to fence to minimize risk of vehicle collisions with wildlife.

7

14

59

N

0 0.25 0.5 Miles

Document Path: Y:\Solar_Projects\CFE_ConeflowerEnergy\GIS\MXD\Permitting\MNDOT\CFE_MNDOT_Road_ROW_to_Fence_Setback.mxd