

February 20, 2026

VIA E-FILING

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

Re: In the Matter of the Application of Castle Rock Solar LLC for a Site Permit for the up to 150 MW Castle Rock Solar Project in Dakota County, Minnesota
Revisions indicated in blue.

Docket No. IP-7137/GS-24-267
CAH Docket No. 65-2500-40800

Dear Ms. Bergman:

As indicated in Castle Rock Solar LLC's (Castle Rock Solar) exceptions to the Administrative Law Judge's (ALJ) Findings of Fact, Conclusions of Law, and Recommendation (Report), Castle Rock Solar has been coordinating with the Minnesota Public Utilities Commission's (Commission) Energy Infrastructure Permitting staff (PUC-EIP) and Minnesota Department of Natural Resources (MDNR) to further discuss Special Condition 5.14 (Karst Condition).¹ Castle Rock Solar submits this [revised](#) letter to provide an update on discussions about the Karst Condition, including updated language for the condition agreed on by Castle Rock Solar, PUC-EIP, and MDNR.

By way of background, PUC-EIP included a draft site permit with the Environmental Assessment (EA).² The draft site permit included the Karst Condition, which would require Castle Rock Solar to file a geotechnical report prior to construction and limit construction activity within 150 feet of documented karst features. In comments, MDNR proposed amendments to the Karst Condition to add a requirement for Castle Rock Solar to survey for surface karst features within areas mapped by the MDNR as regions prone to surface karst feature development.³

In reply comments, Castle Rock Solar noted that the EA did not explain the reason for the 150-foot setback, and that the proposed Karst Condition did not fully reflect best practices for development around karst geology. Best practices call for geophysical and/or geotechnical assessments to evaluate site-specific risks and determine appropriate setbacks and mitigation measures. Accordingly, Castle Rock Solar proposed an alternative condition that would require

¹ ALJ Report (January 9, 2026) (eDockets No. [20261-226701-01](#)).

² Environmental Assessment Appendix C – Draft Site Permit (October 10, 2025) (eDockets No. [202510-223781-04](#)).

³ MDNR Comments (November 3, 2025) (eDockets No. [202511-224630-01](#)).

karst geological assessment and development of site-specific setbacks in consultation with MDNR.⁴

In reply comments, PUC-EIP did not address Castle Rock Solar's proposed Karst Condition. PUC-EIP supported MDNR's proposed modification and recommended additional revisions to require Castle Rock Solar to share the results of the surface karst feature survey with the Commission and MDNR at least 14 days prior to the pre-construction meeting.⁵

The ALJ described Castle Rock Solar's proposal as "significantly different" from PUC-EIP and MDNR's special condition, and ultimately recommended the Karst Condition from the draft site permit, with modifications as proposed by MDNR and PUC-EIP.⁶

In exceptions to the ALJ Report, Castle Rock Solar renewed its observation that the need for an outright 150-foot buffer around active karst features was not supported by the record. Because appropriate buffers depend on site-specific conditions and best management practices vary by location and feature, Castle Rock Solar believes that the 150-foot distance reflects a high-risk activity buffer rather than a universal standard. Accordingly, Castle Rock Solar indicated that it would coordinate with PUC-EIP and MDNR on the Karst Condition in the hopes of developing a Karst Condition that is amenable to Castle Rock Solar, PUC-EIP, and MDNR.⁷

Castle Rock Solar continued to discuss the Karst Condition with PUC-EIP and MDNR after the exceptions were filed. As a result of those discussions, Castle Rock Solar, PUC-EIP, and MDNR have reached an agreement on the following condition for this Project.⁸ The proposed condition language for this Project is:

The Permittee shall file a geotechnical investigation report prepared for the Project construction area by a third-party geotechnical engineer or authorized representative. The report shall include methodology, results, and conclusions drawn from the geotechnical investigation with recommendations on project design and construction. The Permittee shall file the geotechnical report with the Commission at least 14 days prior to the pre-construction meeting.

⁴ Castle Rock Solar Response to Public Hearing Comments (November 17, 2025) (eDockets No. [202511-225010-01](#)).

⁵ PUC-EIP Reply Comments (December 1, 2025) (eDockets No. [202512-225387-01](#)).

⁶ ALJ Report (January 9, 2026) (eDockets No. [20261-226701-01](#)).

⁷ Castle Rock Solar Exceptions to ALJ (January 29, 2026) (eDockets No. [20261-227579-01](#)).

⁸ Castle Rock Solar continues to believe a karst-specific setback should be determined after completion of geotechnical and geophysical surveys of the site to better inform the site-specific best practices that should be employed at a particular site. However, in the interests of reaching a consensus with the MDNR and PUC-EIP, Castle Rock Solar will employ the specific setbacks set forth in the agreement upon permit condition.

The Permittee shall conduct a survey for surface karst features within areas mapped by the DNR as Minnesota Regions Prone to Surface Karst Feature Development. The Permittee shall file the survey results with the Commission and report any new karst features to MNkarstfeaturesinventory.dnr@state.mn.us at least 14 days prior to the pre-construction meeting.

The Permittee shall not locate project infrastructure within 150 feet of documented active karst features. The Permittee shall implement Minnesota Pollution Control Agency's current guidance for Best Management Practices (BMPs). The Permittee shall direct stormwater away from karst features and maintain a 150-foot buffer.

Permittee shall not store fuel, chemicals, or other hazardous materials, conduct fueling, or store or maintain vehicles or construction equipment within 150 feet of documented active karst features.

The Permittee shall avoid all construction activity within 150 feet of documented active karst features.

Construction activities shall not impact active surface karst features unless addressed in a karst protection and management plan. If active surface karst features have the potential to be impacted by construction activities, the Permittee shall, in consultation with the Commission, prepare and file karst protection and management plan at least 30 days prior to the pre-construction meeting.

[The Permittee shall clearly note all karst features and associated buffers on the project Site Plan.](#)

A copy of this filing is also being served as designated on the Official Service List on file with the Minnesota Public Utilities Commission. Please let me know if you have any questions regarding this filing

Sincerely,

FREDRIKSON & BYRON, P.A.

/s/ Jeremy P. Duehr

Jeremy P. Duehr

Direct Dial: 612.492.7413

Email: jduehr@fredlaw.com

JPD

**In the Matter of the Application of Castle
Rock Solar LLC for a Site Permit for the
up to 150 MW Castle Rock Solar Project in
Dakota County, Minnesota**

CERTIFICATE OF SERVICE

**MPUC Docket No.: IP-7137/GS-24-267
CAH Docket No. 65-2500-40800**

Abby Goshgarian certifies that on the 20th day of February 2026, she e-filed on behalf of Castle Rock Solar LLC, a true and correct copy of the revised letter with the Minnesota Public Utilities Commission via eDockets (www.edockets.state.mn.us).

Said document was also served as designated on the Official Service List on file with the Minnesota Public Utilities Commission and as attached hereto.

Executed on: February 20, 2026

Signed: /s/ Abby Goshgarian

Fredrikson & Byron, P.A.
60 South Sixth Street
Suite 1500
Minneapolis, MN 55402

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Lauren	Agnew	lauren.agnew@state.mn.us		Public Utilities Commission	85 7th Place East, Suite 280 Saint Paul MN, 55101 United States	Electronic Service		No	24-267 Official CC Service List
2	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	24-267 Official CC Service List
3	Ron	Boyd	ron.boyd@solarstonepartners.com	SolarStone Development LLC		1681 Villa Ct. Marco Island FL, 34145 United States	Electronic Service		No	24-267 Official CC Service List
4	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	24-267 Official CC Service List
5	Jeremy	Duehr	jduehr@fredlaw.com	Fredrikson & Byron, P.A.		60 S Sixth St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	24-267 Official CC Service List
6	Craig	Empey	craigempey@empeylawoffice.com	Empey Law Office		Ste 204, American Financial Center 1060 Dakota Dr Mendota Heights MN, 55120 United States	Electronic Service		No	24-267 Official CC Service List
7	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	24-267 Official CC Service List
8	Jacques	Harvieux	jacques.harvieux@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 Saint Paul MN, 55101-2147 United States	Electronic Service		No	24-267 Official CC Service List
9	Derek	Hasek	derek.hasek@solarstonepartners.com			3316 Highland Ave Wayzata MN, 55391 United States	Electronic Service		No	24-267 Official CC Service List
10	Breann	Jurek	bjurek@fredlaw.com	Fredrikson & Byron PA		60 S Sixth St Ste 1500 Minneapolis MN, 55402 United States	Electronic Service		No	24-267 Official CC Service List
11	Jennifer	Kamm	jennifer.kamm@stantec.com	Stantec		One Carlson Parkway, Suite 100 Plymouth MN, 55447 United States	Electronic Service		No	24-267 Official CC Service List
12	Molly	Leisen	mleisen@fredlaw.com	Fredrikson & Byron P.A.		60 South Sixth Street Suite 1500 Minneapolis MN, 55402 United States	Electronic Service		No	24-267 Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
13	Ryan	MacWilliams	rmacwilliams@matrixrenewables.com	Matrix Renewables USA LLC		800 Brickell Ave, Suite 901 Miami FL, 33131 United States	Electronic Service		No	24-267 Official CC Service List
14	Ann	O'Reilly	ann.oreilly@state.mn.us		Office of Administrative Hearings	PO Box 64620 St. Paul MN, 55101 United States	Electronic Service		Yes	24-267 Official CC Service List
15	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	24-267 Official CC Service List
16	Shantal	Pai	spai@fredlaw.com	Fredrikson and Byron, P.A.		60 South Sixth Street Suite 1500 Minneapolis MN, 55402 United States	Electronic Service		No	24-267 Official CC Service List
17	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	24-267 Official CC Service List
18	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	24-267 Official CC Service List
19	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	24-267 Official CC Service List
20	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	24-267 Official CC Service List