



**In the Matter of the Joint Application of Summit Lake Solar, LLC for a Site Permit for the 200 MW Solar Energy Generating System and 200 MW Battery Energy Storage System for the Summit Lake Project in Nobles County, Minnesota**

**AMENDED ENVIRONMENTAL ASSESSMENT  
SCOPING DECISION**

**DOCKET NOS. IP-7153/GS-25-89 and  
IP-7153/ESS-25-88**

The above matter has come before the Executive Secretary of the Minnesota Public Utilities Commission (Commission) for a decision on the scope of the environmental assessment (EA) to be prepared for Summit Lake Solar, LLC's proposed 200 megawatt (MW) solar energy project and 200 MW battery energy storage system (BESS) to be located Nobles County, Minnesota. The Commission is reviewing this application under Minnesota Statute 216E (2023).

## **Project Description**

On February 21, 2025, Summit Lake Solar, LLC (Summit Lake) submitted a site permit application to the Minnesota Public Utilities Commission (Commission) to construct and operate the Summit Lake Project (project) – a 200 MW photovoltaic solar energy generating facility and associated BESS facility with an up to 200 MW / 800-megawatt hour (MWh) nameplate capacity.<sup>1</sup> Following public meetings and a public comment period, the Commission issued a scoping decision for the project on July 17, 2025.<sup>2</sup>

On October 14, 2025, Summit Lake requested a pause in the permitting process to revise the design of its project.<sup>3</sup> On December 18, 2025, Summit Lake filed an application amendment reflecting the revised project design and requiring this amended scoping decision for the project.<sup>4, 5</sup>

The project area is approximately 1,987 acres located in Nobles County, Minnesota. There are approximately 573 acres of the project area for which Summit Lake has site control but are not currently contemplated for occupation by the solar facility or BESS. The solar panels will be installed in a north to south configuration on a tracking system that utilizes steel for the foundations and aluminum for the racking frame. Motors allow the racking to rotate from east to west throughout the day. The electric power generated by the solar panels will be transmitted to inverters and carried through collector system cables to the project substation. The project substation will transform the voltage to 345 kV, and the electrical energy will be transmitted to the existing Nobles Substation via a short (< 1,500 feet) proposed gen-tie line.

Summit Lake has an executed Generator Interconnection Agreement with Xcel Energy and the Midcontinent Independent System Operator, Inc. (MISO) to accommodate up to 200 MW AC from the solar facility. Summit Lake is pursuing an additional, separate Generator Interconnection Agreement for

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<sup>1</sup> Summit Lake, Joint Site Permits Application to the Minnesota Public Utilities Commission, February 21, 2025, [eDockets](#) Nos. [20252-215674-01](#) (through -14).

<sup>2</sup> PUC EIP, Environmental Assessment Scoping Decision, July 17, 2025, eDockets No. [20257-221108-01](#)

<sup>3</sup> Summit Lake, Request to Pause Proceedings, October 14, 2025, eDockets No. [202510-223903-01](#)

<sup>4</sup> Summit Lake Storage and Summit Lake Solar, Summit Lake Site Permit Application Amendment, December 18, 2025, eDockets nos. [202512-226022-01](#) (through -09)

<sup>5</sup> Minn. Rule 7850.3700, Subp. 3.

the BESS to operate independently and receive and store energy directly from the electric grid. The project substation would provide the BESS with an independent connection to the electrical grid. The BESS could accommodate up to 200 MW of surplus energy and inject it back into the electrical grid during times of increased demand or brief power outages.

## **Project Purpose**

Summit Lake indicates that the project will support the State of Minnesota in meeting its carbon-free standards, renewable energy standards, and solar energy standards. In addition, the BESS will store excess energy from the grid that may have otherwise been curtailed and inject up to 200 MW AC back into the grid during times of increased demand or brief power outages.

## **Regulatory Background**

### **Large Electric Power Generating Plant Site Permit**

In Minnesota, no person may construct a large electric power generating plant without a site permit from the Commission.<sup>6</sup> A large electric power generating plant is defined as a facility capable of operating at a capacity of 50 MW or more.<sup>7</sup> The Summit Lake Solar project will be capable of producing up to 200 MW and therefore requires a site permit from the Commission. Because the project is powered by solar energy, the site permit application qualifies for Commission review under the alternative permitting process described in Minnesota Statute 216E.04, Subd. 2.<sup>8</sup>

### **Energy Storage System Site Permit**

In Minnesota, no person may construct an energy storage system (ESS), defined as a facility capable of operating at a capacity of 10 MW or more,<sup>9</sup> without a site permit from the Commission. Summit Lake's proposed project will have a nominal capacity of up to 200 MW and therefore requires a site permit from the Commission.

## **Environmental Review**

Commission Energy Infrastructure Permitting (EIP) staff is responsible for conducting the environmental review for site and permit applications submitted to the Commission.<sup>10</sup> EIP staff will prepare an environmental assessment (EA) for the project. An EA contains an overview of the resources affected by the project. It also discusses potential human and environmental impacts and possible mitigation measures.<sup>11</sup> An EA is the only required state environmental review document for this project.

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<sup>6</sup> Minnesota Statute 216E.03, Edition Year 2023.

<sup>7</sup> Minnesota Statute 216E.01, Edition Year 2023.

<sup>8</sup> The Agriculture and Energy Omnibus Bill passed in Minnesota's 2024 legislative session reformed state energy permitting policy. Effective July 1, 2025, environmental review and permitting of solar farms by the Commission will be conducted in accordance with Minnesota Statute 216I. Site permit applications for solar farms submitted prior to July 1, 2025, will be reviewed in accordance with Minnesota Statute 216E. Summit Lake submitted a site permit application before July 1, 2025; as such, the permitting process will continue pursuant to Minnesota Statute 216E.

<sup>9</sup> Minnesota Statute 216E.01.subd. 3a, Edition Year 2023.

<sup>10</sup> Minnesota Rule 7850.3700, Edition Year 2023.

<sup>11</sup> Minnesota Statute 216E.04, subd. 5, Edition Year 2023; Minn. Rule 7850.3700, subp. 4, Edition Year 2023.

## Scoping Process

Scoping is the first step in the environmental review process. The scoping process has two primary purposes: (1) to gather public input as to the impacts and mitigation measures to study in the EA and (2) to focus the EA on those impacts and mitigation measures that will aid in the Commission's decision on the site permit application.

Staff use the information gathered during scoping to inform the content of the EA. EIP staff gathered input on the scope of the EA through public meetings and an associated comment period. This scoping decision identifies the impacts and mitigation measures that will be analyzed in the EA.

## Public Information and Scoping Meetings

On May 21, 2025, Commission staff held a remote-access public meeting. Approximately fourteen individuals from the public attended this meeting, and there were no comments.<sup>12</sup> On May 22, 2025, Commission staff held an in-person public meeting in Worthington, Minnesota. Approximately 90 people attended this meeting. Several attendees voiced support for the project and Summit Lake's dedication to using local union labor. Many attendees, including local residents and homeowners, had questions and concerns related to proposed setbacks, impacts to wildlife and its habitat, introduction of invasive pest species, crop damage, fire safety, noise pollution, water quality, well integrity, potential damage to drain tile and county drainage systems, aesthetics, potential damage to solar panels from weather, project fencing, funding in the event of project decommissioning, and property value impacts.

## Written Public Comments

A comment period ending on June 5, 2025, provided the public with an opportunity to provide input on the scope of the EA. Written comments were received from nineteen local members of the general public, the Minnesota Department of Natural Resources, and the Minnesota Department of Agriculture.<sup>13</sup>

### *General Public*

Nineteen members of the general public provided written comments related to the project. Some commenters expressed their support for the project. Some commenters raised concerns including economic impacts, fire safety and first responder training, environment impacts, solar panel recycling noise pollution, water pollution, impacts to drain tile, decommissioning, and property value impacts.

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<sup>12</sup> Summit Lake Project, Oral Comments on the Scope of Environmental Assessment, June 2025, eDockets No. [20256-219916-01](#).

<sup>13</sup> Summit Lake Project, Written Comments on the Scope of Environmental Assessment, April 2025, eDockets No. [20256-219917-01](#).

## Minnesota Agencies

### ***Minnesota Department of Natural Resources (DNR)***

The Minnesota Department of Natural Resources (DNR) provided written comments related to several project components and also provided a copy of its National Heritage Review letter.<sup>14</sup> Comments included:

- Recommending the applicant adhere to the DNR-recommended security fence height of ten feet rather than the seven foot height proposed in the application.
- Recommending that the EA discuss project fencing plans, dust control products, lighting, erosion control, and mitigating impacts on wildlife consistent with DNR guidance.<sup>15</sup>
- Requesting the EA discuss the construction and vegetation reestablishment phases in order to minimize stormwater runoff, stabilize soil, and support habitat for the solar and BESS facilities, and recommending the utilization of a Vegetation Management Plan (VMP), that is consistent with the DNR's *Prairie Establishment and Maintenance Technical Guidance for Solar Projects*.<sup>16</sup>

### ***Minnesota Department of Agriculture (MDA)***

The Minnesota Department of Agriculture (MDA) provided written comments related to its role in the development of the project's Agricultural Impact Mitigation Plan (AIMP).<sup>17</sup> The MDA stated that it had reviewed Summit Lake's AIMP, and that the MDA had no concerns or comments regarding the AIMP as it was submitted to the docket.

## Scoping Decision

On July 17, 2025, the Commission issued a scoping decision for the project.<sup>18</sup> Subsequently, Summit Lake requested a pause in the permitting process to revise the design of its project.<sup>19</sup> Summit Lake indicated that it was revising the design, in part, to address public comments received during the scoping process.

## Application Amendment

On December 18, 2025, Summit Lake filed an application amendment reflecting a revised project design (Figure 1). The amendments to the project include:

- Reducing the size of the Preliminary Development Area by approximately 65 acres.
- Identifying locations where vegetative screening would be used to mitigate aesthetic impacts.
- Moving the BESS location northeast, farther from the town of Reading.

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<sup>14</sup> Comments from the Minnesota Department of Natural Resources, eDockets Nos. [20256-219615-01](#) and [20256-219615-02](#)

<sup>15</sup> Minnesota DNR, Commercial Solar Siting Guidance, February 2023. Retrieved from:

[https://files.dnr.state.mn.us/publications/ewr/commercial\\_solar\\_siting\\_guidance.pdf](https://files.dnr.state.mn.us/publications/ewr/commercial_solar_siting_guidance.pdf).

<sup>16</sup> Minnesota DNR, Prairie Establishment and Maintenance Technical Guidance for Solar Projects, February 2025. Retrieved from:

[https://files.dnr.state.mn.us/publications/ewr/prairie\\_solar\\_tech\\_guidance.pdf](https://files.dnr.state.mn.us/publications/ewr/prairie_solar_tech_guidance.pdf).

<sup>17</sup> Comments from the Minnesota Department of Agriculture, eDockets No. [20252-215789-01](#).

<sup>18</sup> PUC EIP, Environmental Assessment Scoping Decision, July 17, 2025, eDockets No. [20257-221108-01](#)

<sup>19</sup> Summit Lake, Request to Pause Proceedings, October 14, 2025, eDockets No. [202510-223903-01](#)

- Moving the Operations and Maintenance (O&M) facility to be adjacent to the project substation.
- Increasing stormwater pond retainage from 17.2 acres to 28.3 acres.
- Decreasing the length of the gen-tie line by 108 feet.

The application amendment did not propose an increase to the acreage necessary to host the project's facilities, and no new landowners would be impacted. No changes were proposed to the capacities of the solar facility or BESS, to project costs, or to the planned commercial operation date. The amendment application did request a name change for the BESS applicant – from Summit Lake Solar, LLC to Summit Lake Storage, LLC.

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**HAVING REVIEWED THE MATTER**, consulted with EIP staff, and in accordance with Minnesota Rule 7850.3700, I hereby make the following scoping decision:

## **MATTERS TO BE ADDRESSED**

The EA will describe the project and the human and environmental resources of the project area. It will provide information on the potential impacts of the project as they relate to the topics outlined in this scoping decision and possible mitigation measures. It will identify impacts that cannot be avoided and irretrievable commitments of resources, as well as permits from other government entities that may be required for the project. The EA will discuss the relative merits of the proposed project site with respect to the siting factors in Minnesota Rule 7850.4100.

The issues outlined below will be analyzed in the EA for the project. This outline is not intended to serve as a table of contents for the document itself.

### **I. GENERAL DESCRIPTION OF THE PROJECT**

- A. Project Description
- B. Project Purpose
- C. Project Costs

### **II. REGULATORY FRAMEWORK**

- A. Site Permits
- B. Environmental Review
- C. Grid Interconnection
- D. Other Permits and Approvals

### **III. ENGINEERING, DESIGN, AND CONSTRUCTION**

- A. Solar Arrays
- B. BESS Modules
- C. Electrical Collection Systems
- D. Gen-Tie Line
- E. Substation

F. Associated Facilities

**IV. OPERATION AND DECOMMISSIONING**

- A. Maintenance
- B. Vegetation Management
- C. Augmentation, Repowering and Decommissioning

**V. AFFECTED ENVIRONMENT, POTENTIAL IMPACTS AND MITIGATIVE MEASURES**

The EA will include a discussion of the human and environmental resources potentially impacted by the project. Potential impacts of the project will be described and characterized. Based on the impacts identified, the EA will describe mitigation measures that could reasonably be implemented to reduce or eliminate the identified impacts. The EA will describe any unavoidable impacts resulting from implementation of the project.

Data and analyses will be commensurate with the level of impact for a given resource and the relevance of the information to consider mitigation measures. EIP staff will consider the relationship between the cost of data and analyses and the relevance and importance of the information in determining the level of detail of information to be prepared for the EA. Less important material may be summarized, consolidated, or simply referenced.

If relevant information cannot be obtained within timelines prescribed by statute and rule, the costs of obtaining such information is excessive, or the means to obtain it is unknown, EIP staff will include in the EA a statement that such information is incomplete or unavailable and the relevance of the information in evaluating potential impacts or alternatives.

- A. Environmental Setting
- B. Human Settlements
  - 1. Noise
  - 2. Aesthetics (visual screening)
  - 3. Displacement
  - 4. Property Values
  - 5. Zoning and Land Use Compatibility (setbacks, land use change)
  - 6. Cultural Values
  - 7. Transportation and Public Services (access roads)
- C. Socioeconomics
  - 1. Environmental Justice
  - 2. Local Economies (employment, wages)
- D. Public Health and Safety
  - 1. Electric and Magnetic Fields
  - 2. Emergency Services
- E. Land-Based Economies
  - 1. Agriculture (land impacts)
  - 2. Forestry
  - 3. Mining
  - 4. Recreation and Tourism (aesthetic changes)
- F. Archaeological and Historic Resources

- G. Natural Environment
  - 1. Water Resources (stormwater, groundwater)
  - 2. Soils (erosion control)
  - 3. Geology
  - 4. Flora (vegetation removal and management, weed control, native plant communities)
  - 5. Fauna (wildlife corridors, erosion control, fencing, and lighting)
  - 6. Air Quality (fugitive dust)
  - 7. Climate Change / Climate Resiliency
- H. Threatened / Endangered / Rare and Unique Natural Resources (protected species, DNR-managed lands)
- I. Cumulative Impacts Analysis
- J. Adverse Impacts that Cannot be Avoided
- K. Irreversible and Irretrievable Commitments of Resources

## ISSUES OUTSIDE THE SCOPE OF THE EA

The EA will not address following topics:

- Any sites other than those proposed by the applicants in their joint application amendment.
- The manner in which landowners are compensated for the project.

## SCHEDULE

The EA is anticipated to be completed and available in March of 2026. Upon completion, it will be noticed and made available for review. Public hearings will be noticed and held in the project area after issuance of the EA. Comments on the EA may be submitted into the hearing record.

Signed this 22<sup>nd</sup> day of January, 2026

STATE OF MINNESOTA  
MINNESOTA PUBLIC UTILITIES COMMISSION



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Sasha Bergman, Executive Secretary

Figure 1: Revised Project Layout

