

March 15, 2021

**VIA ELECTRONIC FILING**

Mr. Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
Saint Paul, MN 55101-2147

**RE: Reply Comments**

**In the Matter of the Application of Louise Solar Project, LLC for a Certificate of Need for the 50 MW Louise Solar Project in Mower County, Minnesota  
MPUC Docket No. IP-7039/CN-20-646**

Dear Mr. Seuffert:

Louise Solar Project, LLC (“Louise Solar” or the “Applicant”) submits these reply comments regarding the completeness of its application for a Certificate of Need (“CN Application”) for a 50-megawatt (“MW”) alternating current solar large energy facility in Mower County, Minnesota (“Project”). Louise Solar appreciates the Department of Commerce, Division of Energy Resources’ (“DOC-DER”) thorough review of the CN Application and comments on the permitting process going forward. Louise Solar provides these reply comments to address the few issues discussed in the comments of DOC-DER, as well as to discuss the process for further review of the CN Application.

In addition, on or before March 8, 2021, comments were filed by LIUNA of Minnesota & North Dakota and one member of the public. Louise Solar has reviewed these comments and concluded none raised issues with the completeness of the CN Application. Louise Solar anticipates that the issues raised in these public comments will be addressed during the permitting process.

**Completeness.**

DOC-DER generally “concludes that Louise [Solar] met the completion requirements” but also recommends Louise Solar provide information to “address options as of a different size (larger and smaller).” The CN Application discusses the factors that weigh in favor of the 50 MW project, including the general need for renewable energy generation, the available transmission resource opportunities at the site location, commercial viability, and cost-effectiveness and economies of

March 15, 2021

Page 2

size for the project. *See, e.g.*, CN Application at Sections 4.2.1, 5.1.1, and 5.2. Additionally, Louise Solar provides this requested discussion:

A solar project of smaller or larger size may be competitive within the marketplace, but Louise Solar believes the proposed Project size provides a number of advantages. EDFR, Louise Solar's parent company, has generally found that 50 MW is the threshold at which construction costs are competitive for solar projects connecting at transmission level voltages and economies of scale can be realized on the procurement of the project's components. Similarly, for this site, the transmission interconnection costs are very competitive for a 50 MW solar project – the second lowest interconnection costs on a per MW basis of any current solar project in Minnesota with a MISO interconnection. As compared to a smaller solar farm, the Project provides economies of scale which the Applicant believes will reduce per megawatt hour costs of energy and provides efficiencies in transmission capacity utilization.

A larger solar farm, by contrast, may present additional construction cost and equipment procurement economies of scale, but at this site and at many others across the MISO region, interconnection costs are much higher on a per MW basis for a larger solar project due to expected network upgrades.

As it relates to the environmental impacts, a smaller or larger solar farm would be similar on a per solar panel basis but adjusted at scale to the size of the project.

In this rapidly growing solar market, the availability of projects of varying sizes provides cost-effective solar solutions to a wider range of potential customers, as not every potential customer has the capacity to purchase energy from a larger project, while many mid-size customers may find a 50 MW project ideal for their needs.

### **Application Review Process, Joint Proceedings, and Environmental Review.**

Louise Solar agrees with DOC-DER's assessment that a contested case proceeding is not warranted. Louise Solar respectfully requests that the Commission find a joint processing of Louise Solar's CN Application and Site Permit Application ("SP Application") (MPUC Docket No. IP-7039/GS-20-647) (together, "Applications") is justified and that a single environmental review document, an environmental assessment in lieu of an environmental report, be prepared for the Project to provide a more efficient and less confusing public review process. Louise Solar also agrees that it is useful to refer the matter to the Office of Administrative Hearings ("OAH") for a public hearing and preparation of a full administrative law judge report with recommendations.

Consistent with Louise Solar's reply comments filed concurrently in the Site Permit docket (MPUC Docket No. IP-7039/GS-20-647), Attachment A to this letter includes a suggested schedule for completing this joint proceeding within the statutory timeframes and in a manner that

March 15, 2021

Page 3

allows Louise Solar to complete construction in 2022. Solar construction is generally staged for a late-year (Q4) commercial operation date based on milestones set in finance and power purchase agreements. Minnesota winters and spring restrictions limit the pace of construction and activities that can take place during nearly half of the year. A late 2021 permitting decision allows equipment and contractor procurement and the finalization of plans in a manner that ensures an end of 2022 in-service date. Delaying a permit decision into 2022 could delay the in-service date by a full year, unnecessarily postponing local economic development, new jobs, and the climate benefits of this project.

**Conclusion.**

Louise Solar respectfully requests that, with the additional information provided in these reply comments, the Commission accept the CN Application as complete; find there are no contested issues of fact with respect to the proposed facility; set a schedule consistent with Attachment A that allows for the joint processing of Louise Solar's CN Application and SP Application and refer the matters jointly to the OAH for a public hearing and preparation of a full administrative law judge report with recommendations; and find that an advisory task force is not warranted.

These reply comments have been e-filed today through [www.edockets.state.mn.us](http://www.edockets.state.mn.us). A copy of this filing is also being served upon the persons on the Official Service Lists of record. Please let me know if you have any questions regarding this filing.

Sincerely,

*/s/ Christina K. Brusven*

Christina K. Brusven

**Direct Dial:** 612.492.7412

**Email:** cbrusven@fredlaw.com

### Louise Solar Proposed Schedule

Timeframe	Project Day	Process Step	Entity
February-March 2021	—	10-day Notice	Applicant
		Application Filed	Applicant
		Application Completeness Comments	Agencies/Public
		Reply Comments	Applicant
April 2021		Consideration of Application Acceptance	Commission
<b>Acceptance through Environmental Assessment</b>			
April 2021	1	Application Acceptance Order	Commission
April 2021		Public/Scoping Meeting Notice	EERA/Commission
End of April 2021	20	Public Information/Scoping Meetings	EERA/Commission
May 2021	30	Scoping Comment Period Closes	EERA
May 2021	40	Scoping Summary to Commission	EERA
Early June 2021	60	Commission Consideration of Alternatives	Commission
June 2021	70	Scoping Decision Issued	Commerce
August 2021	130	EA Issued/Public Hearing Notice	EERA/Commission
<b>Public Hearing and ALJ Report</b>			
End of August 2021	140	Public Hearing	OAH
September 2021	150	Comment Period Closes	OAH
September 2021	150	Draft FOF	Applicant
September 2021	160	Comments on Draft FOF / Technical Analysis	EERA
		Response to Hearing Comments	Applicant
October 2021	190	ALJ Issues Full Report, FOF and Recommendation	OAH
Early November 2021	205	Exceptions to ALJ Report	EERA, Applicant
Early December 2021	<b>235</b>	Consideration of CN/Site Permit Issuance	Commission

## CERTIFICATE OF SERVICE

I, Alicia P. Jones, hereby certify that I have this day, served a true and correct copy of the following documents to all persons on the attached service list by electronic filing or by depositing the same enveloped with postage paid in the United States mail at Minneapolis, Minnesota:

- Reply Comments; and
- Certificate of Service.

MPUC Docket No. IP-7039/CN-20-646

Dated this 15th day of March 2021

*/s/ Alicia P. Jones*

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000  Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_20-646_Official Service List 20-646
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-646_Official Service List 20-646
Bridget	Duffus	bduffus@fredlaw.com	Fredrikson & Byron, P.A.	200 South Sixth Street Suite 4000 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-646_Official Service List 20-646
Kate	Fairman	kate.frantz@state.mn.us	Department of Natural Resources	Box 32 500 Lafayette Rd St. Paul, MN 551554032	Electronic Service	No	OFF_SL_20-646_Official Service List 20-646
Annie	Felix Gerth	annie.felix-gerth@state.mn.us		Board of Water & Soil Resources 520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	OFF_SL_20-646_Official Service List 20-646
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_20-646_Official Service List 20-646
Lucas	Franco	lfranco@liunagroc.com	LIUNA	81 Little Canada Rd E  Little Canada, MN 55117	Electronic Service	No	OFF_SL_20-646_Official Service List 20-646
Kari	Howe	kari.howe@state.mn.us	DEED	332 Minnesota St, #E200 1ST National Bank Bldg St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-646_Official Service List 20-646
Ray	Kirsch	Raymond.Kirsch@state.mn.us	Department of Commerce	85 7th Place E Ste 500  St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-646_Official Service List 20-646
Karen	Kromar	karen.kromar@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd  Saint Paul, MN 55155	Electronic Service	No	OFF_SL_20-646_Official Service List 20-646

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Susan	Medhaug	Susan.medhaug@state.mn.us	Department of Commerce	Suite 280, 85 Seventh Place East  St. Paul, MN 551012198	Electronic Service	No	OFF_SL_20-646_Official Service List 20-646
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_20-646_Official Service List 20-646
Stephan	Roos	stephan.roos@state.mn.us	MN Department of Agriculture	625 Robert St N  Saint Paul, MN 55155-2538	Electronic Service	No	OFF_SL_20-646_Official Service List 20-646
Jacob	Salisbury	Jacob.Salisbury@edf-re.com	EDF Renewables	10 NE 2nd St Ste 400  Minneapolis, MN 55413	Electronic Service	No	OFF_SL_20-646_Official Service List 20-646
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-646_Official Service List 20-646
Adam	Sokolski	adam.sokolski@edf-re.com	EDF Renewable Energy	10 Second Street NE Ste 400  Minneapolis, MN 55410	Electronic Service	No	OFF_SL_20-646_Official Service List 20-646
Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources	500 Lafayette Road Box 25 St. Paul, Minnesota 55155-4040	Electronic Service	No	OFF_SL_20-646_Official Service List 20-646
David	Weetman	david.weetman@westwoodps.com	Westwood Professional Services	12701 Whitewater Dr Ste 300  Minnetonka, MN 55343	Electronic Service	No	OFF_SL_20-646_Official Service List 20-646
Scott	Wentzell	scott.wentzell@edf-re.com	EDF Renewables	10 NE 2nd St Ste 400  Minneapolis, MN 55413	Electronic Service	No	OFF_SL_20-646_Official Service List 20-646