

STATE OF MINNESOTA
BEFORE THE
PUBLIC UTILITIES COMMISSION

Katie Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
John A. Tuma	Commissioner
Joseph K. Sullivan	Commissioner

In the Matter of the Application of Red Rock Solar, LLC for a Certificate of Need and a Site Permit for an up to 60 MW Solar Facility in Cottonwood County

Docket Nos. IP-7014/CN-19-486
and IP-7014/GS-19-620

REPLY COMMENTS

Red Rock Solar, LLC (“Red Rock”) submits these Reply Comments in response to the Minnesota Public Utilities Commission’s (“Commission”) November 23, 2020 Notice of Comment Period.

I. Background.

The proposed Red Rock Solar Project (“Project”) is an up-to-60 megawatt (“MW”) solar energy conversion facility in Midway Township, Cottonwood County, Minnesota. The Project is proposed as part of a hybrid wind/solar renewable energy project with the Big Bend Wind Farm (*see* MPUC Docket Nos. 19-408, 19-619, and 19-621). Together, the Big Bend Wind Farm and the Project will generate up to 335 MW of renewable energy (275 MW of wind and 60 MW of solar), or up to 308 MW of only wind. Red Rock submitted a Site Permit Application and Certificate of Need (“CN”) Application (together, the “Applications”) for the Project on November 9, 2020.

On November 23, 2020, the Commission issued its Notice of Comment Period requesting comments on several topics related to the Project’s Site Permit and CN Applications. Before the

close of the initial comment period on December 15, 2020, comments regarding the Project were submitted by the Department of Commerce, Division of Energy Resources (“DOC-DER”), Department of Commerce, Energy Environmental Review and Analysis (“DOC-EERA”), LIUNA Minnesota & North Dakota (“LIUNA”), and International Union of Operating Engineers, Local 49 (“Local 49”). LIUNA and Local 49 both expressed support for the Project. In addition, on December 21, 2020, Commission staff e-filed comments submitted by the Minnesota Pollution Control Agency and Southwest Regional Development Commission, neither of which addressed application completeness or the process for reviewing the Applications. Red Rock now submits these Reply Comments in response to those comments, as well as to address the issues raised in the Notice of Comment Period.

II. Completeness.

The Commission requested comments concerning whether the Applications contain the information required under the applicable rules. With respect to the CN Application, DOC-DER recommended the Commission determine that application complete. Similarly, DOC-EERA recommended the Commission determine the Site Permit Application to be complete. Red Rock appreciates DOC-DER’s and DOC-EERA’s review of the Applications and, likewise, respectfully requests that the Commission accept the Applications as complete.

III. Application Review Process.

The Commission requested comments concerning the process to be used for evaluating the Applications. Both DOC-DER and DOC-EERA recommended that the Applications be processed together, and did not oppose a joint review process with the Big Bend Wind Farm. Neither DOC-DER nor DOC-EERA recommended that the Commission refer the Applications to a contested case proceeding. Red Rock agrees with these positions and, accordingly, respectfully requests that the Commission process the Applications jointly, and together with the Big Bend Wind Farm,

under the Commission's normal process. Red Rock further supports proceeding under the conceptual schedule identified in Table 1 attached to DOC-EERA's comments.

IV. Other Matters Open for Comment.

The Commission also requested comments concerning an advisory task force and the environmental review process. DOC-EERA did not recommend the appointment of an advisory task force and supported the preparation of an environmental assessment in lieu of an environmental report. Red Rock requests that the Commission issue an order consistent with these recommendations.

In addition, DOC-EERA recommended that Red Rock submit a lesser-redacted version of Appendix A to the Site Permit Application (Phase 1a Literature Review and Natural Heritage Information System Request). Red Rock agrees to file a revised public version of Appendix E by January 14, 2021, as recommended by DOC-EERA.

Dated: December 23, 2020

Respectfully submitted,

/s/ Christina K. Brusven

Christina K. Brusven (# 0388226)

Haley Waller Pitts (# 0393470)

FREDRIKSON & BYRON, P.A.

200 South Sixth Street, Suite 4000

Minneapolis, MN 55402-1425

Telephone: (612) 492-7000

Fax: (612) 492-7077

Attorneys for Red Rock Solar, LLC

71716965