

July 6, 2026

VIA EFILING ONLY

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

Re: In the Matter of the Site Permit for the up to 80 MW Cottage Grove BESS Project in
Cottage Grove, Minnesota

MPUC Docket No. IP7180/ESS-26-184

Dear Ms. Bergman:

LSP CG Storage, LLC (the Applicant), submits this supplemental filing in response to the Minnesota Public Utilities Commission (Commission) Energy Infrastructure Permitting (EIP) staff's application completeness determination regarding the Applicants' application for a site permit (Application) for the Cottage Grove Battery Energy Storage System (BESS) Project (Project).

The Applicant filed its Application with the Commission on June 10, 2026. On June 25, 2026, EIP staff issued an application completeness determination.¹ The Applicant appreciates EIP staff's acknowledgement that the Application is complete in accordance with Minn. Stat. § 216I.05. The Applicants also provide the additional information requested by EIP staff in the sections below.

A discussion and description of the anticipated battery augmentation for this Project as a component of future expansion, including updated figures, including a description of how augmentation may interact with anticipated environmental impacts such as aesthetic, noise, or any anticipated cumulative impacts.

All batteries lose capacity and degrade over time, and BESS batteries are no exception. The batteries that make up a BESS project will also eventually degrade and need to be replaced or supplemented to maintain outlined operational conditions throughout the system's life span. BESS augmentation is the process of adding battery capacity as the system ages to maintain outlined operational conditions.

¹ Application Completeness Determination (June 25, 2026) (eDocket No. [20266-233296-01](#)).

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The Cottage Grove BESS Project will undergo augmentation either through the addition of battery modules within the existing enclosures or the addition of supplemental battery enclosures to maintain the facility's rated capacity. The augmentation schedule to maintain overall Project functionality varies based on final equipment selection, so the Applicant will determine an augmentation schedule during the design process based on the projected degradation of the batteries. The Applicant has designed the site to accommodate up to 15 additional units planned to be installed at years 5, 9, and 13, which would be in approximately 2033, 2037, and 2041.² In addition, the Applicant may add up to five additional MVT skids to augment additional BESS enclosures in the future.³ Specific installation timing will vary based on capacity monitoring during operations.

Augmentation units would be within the boundary of the Project Site, so augmentation will not alter the environmental impacts of the Project compared to initial build out. *See Revised Map 3.* When augmentation units are installed two to four units would be installed at a time, so the construction required for augmentation is minimal and short-lived.

As discussed in the Application, the Project will introduce new manmade structures into an existing industrial landscape. Most of the BESS Facility will be a non-descript neutral color, with the majority of components being less than 10 feet in height,⁴ including any augmentation units or additional MVT skids. Augmentation would not change lighting impacts from the Project. The Sample Site Permit conditions to minimize aesthetic impacts from the Project, including a condition requiring the Permittee to consider input from area landowners and local government units to mitigate visual impacts, and the requirement to use care to preserve the natural landscape, minimize tree removal and prevent unnecessary destruction of the natural surroundings in the vicinity of the Project during construction and operation would help minimize impacts from the Project, and apply equally to augmentation.

The Applicant completed a noise assessment for operational noise impacts of the Project at its end-of-life configuration, which included augmentation.⁵ Because the noise assessment considered the end-of-life configuration, it considers noise associated with augmentation. Under that scenario, which is a conservative estimate of noise from the site, all receptors were within state noise standards.

In addition, the Applicant proposes a special condition to require the permittee to update noise modeling assessment when augmentation BESS units are to be installed.

² Site Permit Application at 23 (June 10, 2026) (eDockets No. [20266-232726-02](#)).

³ Site Permit Application at 25 (June 10, 2026) (eDockets No. [20266-232726-02](#)).

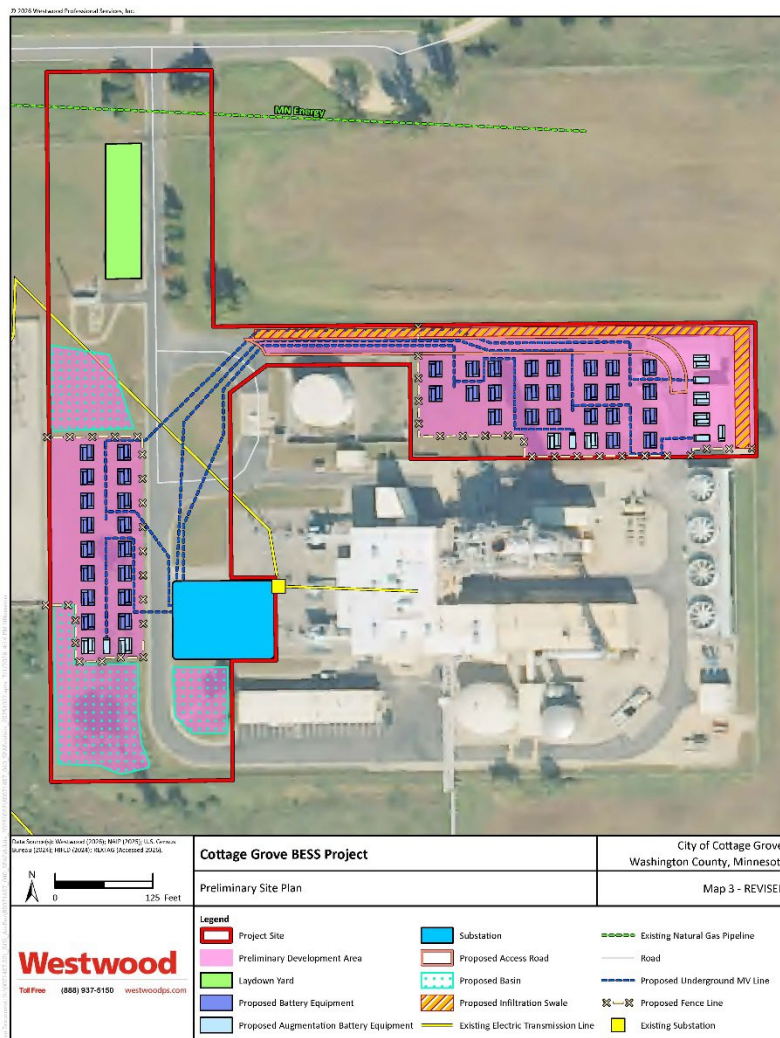
⁴ Site Permit Application at 52 (June 10, 2026) (eDockets No. [20266-232726-02](#)).

⁵ Site Permit Application, Appendix L at 3 (June 10, 2026) (eDockets No. [20266-232726-14](#)).

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To evaluate potential Cumulative Impacts during augmentation, the Applicant reviewed the Environmental Quality Board's Environmental Review Projects Database for Projects during augmentation periods (which are likely after 2033).⁶ The Applicant searched for reasonably foreseeable projects in spatial proximity to the Proposed Project during possible augmentation period, but did not identify any reasonably foreseeable projects that could result in cumulative impacts. In addition, the Applicant notes that impacts from augmentation will be minimal, or have been studied in the Application, because augmentation does not require significant construction at the Project Site.

Revised Map 3 – Preliminary Site Plan with Augmentation Units



⁶ Environmental Review Projects Database, EQB, <https://webapp.pca.state.mn.us/eqb-search/search>.

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Additional discussion of potential contaminants within the project site, including measures to be taken in the event that contaminated soils are encountered by workers during construction of the project.

As discussed in the Application, there is one controlled recognized environmental condition (CREC) and one recognized environmental condition (REC) near the Project Site.⁷ Workers are not likely to encounter containments from either environmental condition during construction of the Project.

One 755,000-gallon fuel oil tank is located approximately 15 feet outside the Project Site, in secondary containment. This is considered a REC for the Project Site because of the potential for release, but there are no known releases from the fuel oil tank at the site. The fuel oil tank is in fair condition, and situated within secondary containment

In addition, the Project Site is located within the east-metro PFAS groundwater area of concern.⁸ Based on this, there may be PFAS in groundwater at the site. It is unlikely that workers would encounter groundwater or that construction would impact groundwater. The depth to the water table within the site ranges from 30 feet to over 50 feet, with an average depth of 40 to 50 feet to the water table.⁹ BESS foundations will consist of approximately ¾ inch aggregate pads installed at an estimated depth of one to three feet below ground surface, therefore BESS foundation construction is unlikely to encounter groundwater.¹⁰ Workers may temporarily encounter shallow groundwater or moisture bearing zones during trenching for the underground feeder system. Such exposures would be limited to localized shallow subsurface water, and workers are not expected to reach or influence regional groundwater flow or aquifer systems. Accordingly, worker exposure to PFAS is not likely from trenching for the underground feeder system either.¹¹ Studies of health impacts from PFAS have shown that only small amounts of PFAS can enter the body through skin,

⁷ The term REC means the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. The term CREC means a recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls. Site Permit Application at 59 (June 10, 2026) (eDockets No. [20266-232726-02](#)).

⁸ Site Permit Application at 60 (June 10, 2026) (eDockets No. [20266-232726-02](#)).

⁹ Site Permit Application at 99 (June 10, 2026) (eDockets No. [20266-232726-02](#)).

¹⁰ Site Permit Application at 101 (June 10, 2026) (eDockets No. [20266-232726-02](#)).

¹¹ Site Permit Application at 101 (June 10, 2026) (eDockets No. [20266-232726-02](#)).

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therefore even activities like showering, bathing, and washing dishes in water containing PFAS are unlikely to significantly increase risk of PFAS-related health impacts.¹²

While workers encountering environmental contaminants during construction is not likely, in the case that uncontaminated soils or groundwaters are encountered, the Applicant will develop and implement a Contaminated Sites Management Plan (CSMP) prior to construction to reduce worker impacts. A CSMP plan includes identification, notification and documentation of the contamination, management of the contaminated materials (e.g., soil, water) through proper removal and disposal with continuous testing and monitoring of the area, and reporting to the Minnesota Pollution Control Agency for any observations and management activity that took place within the contaminated area.

Additional Staff Comments

In addition to the supplemental information provided here, Staff requested that the Applicants ensure that notice had been provided to the “Agency Reps” service list in eDockets because each State Technical Resource Agency identified in this service list will determine its preapplication coordination procedures. The Applicant notes that the Commission served the June 24, 2026 Notice of Complete Site Permit Application and Public Information Meetings on the “Agency Reps” service list in eDockets,¹³ and that the Applicant sent notification letters including a Project location map to state technical resource agencies on November 20, 2025, and engaged in pre-application coordination with state technical resources agencies, as summarized in the Application.¹⁴ Appendix D of the Site Permit Application includes the notification letters and responses.¹⁵ The Applicant remains committed to ongoing coordination with state agencies.

Staff also encouraged the Applicant to continue to (1) follow up with Tribal Communities and document those instances throughout the permitting process, (2) coordinate with LGUs regarding zoning, setbacks, screening, ROW impacts, and other requests throughout the permitting process and provide updates to the Commission on coordination as appropriate, (3) to prepare an Unanticipated Discoveries Plan prior to construction, which will include notifying SHPO, the Office of the State Archaeologist, and the Leech Lake Band of Ojibwe if a discovery is determined to be a significant cultural resource, (4) incorporate DNR’s guidance when appropriate, particularly relating to recommendations included in the Natural Heritage Review letter, and (5) to adhere to the DNR’s recommendations to mitigate potential impacts to protected species and/or

¹² *Meaningful and Achievable Steps You Can Take to Reduce Your Risk*, U.S. EPA, <https://www.epa.gov/pfas/meaningful-and-achievable-steps-you-can-take-reduce-your-risk> (April 21, 2026)

¹³ Notice of Complete Site Permit Application & Public Information Meetings (June 24, 2026) (eDockets No. [20266-232989-01](#)).

¹⁴ Site Permit Application at 8–10 (June 10, 2026) (eDockets No. [20266-232726-02](#)).

¹⁵ Site Permit Application, Appendix D (eDockets No. [20266-232726-06](#)).

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habitat throughout construction of the project, such as the Loggerhead Shrike or the Blanding's Turtle.

The Applicant appreciates Staff's recommendations and will continue to: (1) engage with Tribal Communities and document those coordination efforts throughout the permitting process; (2) coordinate with local governmental units on zoning, setbacks, screening, right-of-way impacts, and other project-related matters, and provide updates to the Commission as appropriate; (3) prepare an Unanticipated Discoveries Plan prior to construction, including procedures for notifying SHPO, the Office of the State Archaeologist, and the Leech Lake Band of Ojibwe if a significant cultural resource is identified; (4) consider and incorporate DNR guidance, where appropriate, including recommendations contained in the Natural Heritage Review letter; and (5) implement DNR-recommended measures to avoid and minimize impacts to protected species and habitats during construction, including species such as the Loggerhead Shrike and Blanding's Turtle, as appropriate.

These comments have been electronically filed today through www.edockets.state.mn.us. A copy of this filing is also being served upon the persons on the Official Service List of record.

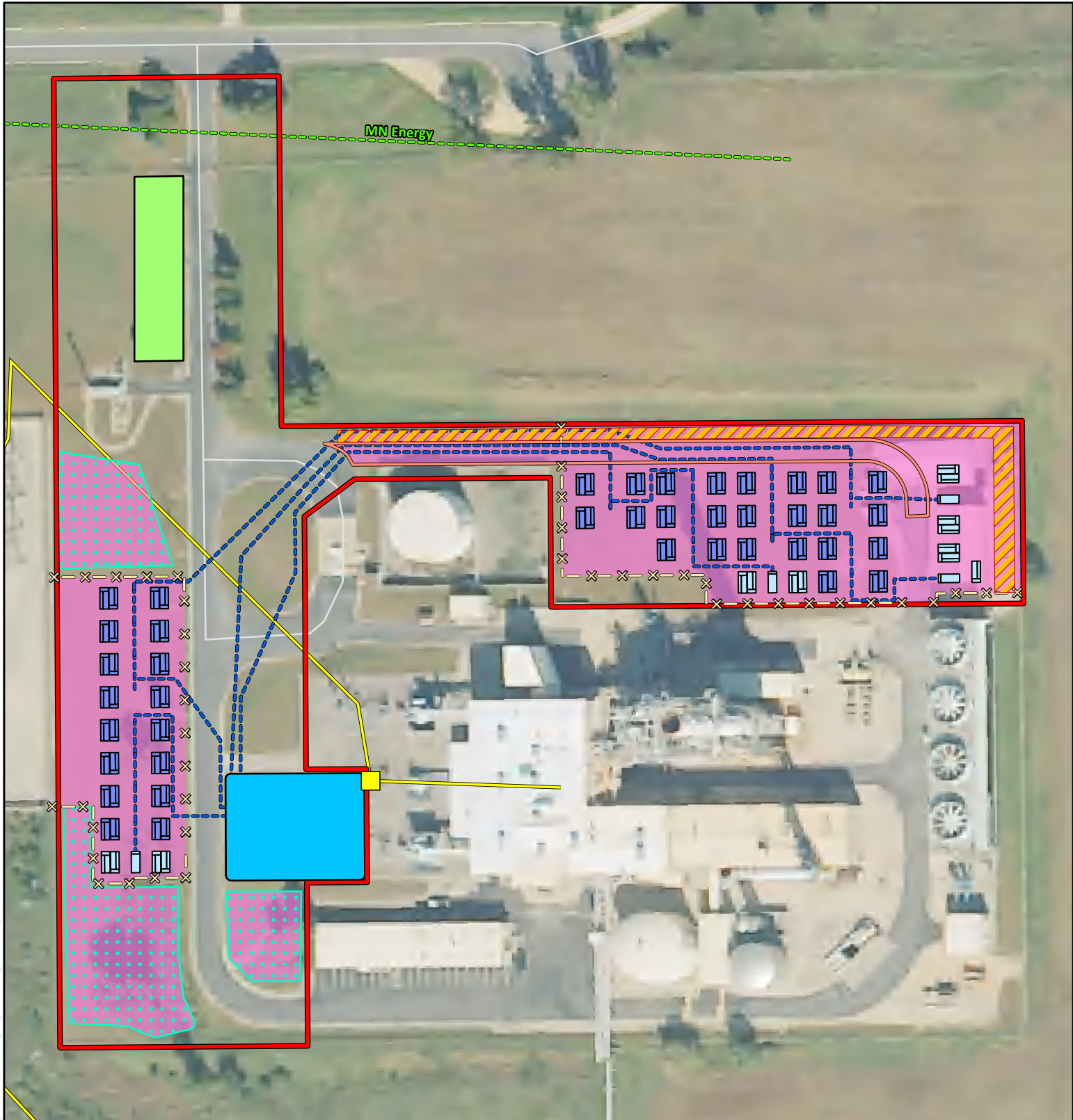
Please let me know if you have any questions regarding this filing.

Sincerely,

/s/ David R. Moeller

David R. Moeller
Direct Dial: 612.492.7422
Email: drmoeller@fredlaw.com

Attachment



Data Source(s): Westwood (2026); NAIP (2025); U.S. Census Bureau (2024); HIFLD (2024); REXTAG (Accessed 2026).

N
0 125 Feet

Cottage Grove BESS Project		City of Cottage Grove, Washington County, Minnesota
Preliminary Site Plan		Map 3 - REVISED

 Toll Free (888) 937-5150 westwoodsps.com		
Legend		
 Project Site	 Substation	 Existing Natural Gas Pipeline
 Preliminary Development Area	 Proposed Access Road	 Road
 Laydown Yard	 Proposed Basin	 Proposed Underground MV Line
 Proposed Battery Equipment	 Proposed Infiltration Swale	 Proposed Fence Line
 Proposed Augmentation Battery Equipment	 Existing Electric Transmission Line	 Existing Substation

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to 80 MW Cottage Grove BESS Project in
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CERTIFICATE OF SERVICE

Breann L. Jurek certifies that on the 6th day of July 2026, she e-filed a true and correct copy of these supplemental comments on behalf of LSP CG Storage, LLC via eDockets (www.edockets.state.mn.us):

Said documents were also served on the Official Service List of record on file with the Minnesota Public Utilities Commission and as attached hereto.

Executed on: July 6, 2026

Signed: /s/ Breann L. Jurek

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	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	ESS-26-184
2	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	ESS-26-184
3	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 600 St. Paul MN, 55101 United States	Electronic Service		Yes	ESS-26-184
4	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	ESS-26-184
5	Breann	Jurek	bjurek@fredlaw.com	Fredrikson & Byron PA		60 S Sixth St Ste 1500 Minneapolis MN, 55402 United States	Electronic Service		No	ESS-26-184
6	Konnar	Klinksiek	kklinksiek@panamintcapital.com	LSP CG Storage, LLC		917 Tahoe Blvd., Suite 202 Incline Village NV, 89451 United States	Electronic Service		No	ESS-26-184
7	David R.	Moeller	drmoeller@fredlaw.com	Fredrikson & Byron, P.A.		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		Yes	ESS-26-184
8	Aidan	Oldenburg	aidan.oldenburg@westwoodps.com				Electronic Service		No	ESS-26-184
9	Shantal	Pai	spai@fredlaw.com	Fredrikson & Byron, PA		60 S 6th Street, Minneapolis, MN 55407 Minneapolis MN, 55417-1208 United States	Electronic Service		No	ESS-26-184
10	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	ESS-26-184