

March 12, 2025

**VIA eFILING**

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

The Honorable Christa L. Moseng  
Office of Administrative Hearings  
600 North Robert Street  
P.O. Box 64620  
Saint Paul, MN 55164-0620

**Re: In the Matter of Iron Pine Solar Power, LLC's Joint Application for a Site Permit and Route Permit for a 325-MW Solar Energy Generation System and a 230-kV HVTL Gen-Tie Line in Pine County, Minnesota**

**MPUC Docket Nos. IP-7114/GS-23-414; IP-7114/TL-23-415**

Dear Mr. Seuffert and Judge Moseng:

Iron Pine Solar Power, LLC (Iron Pine Solar) respectfully submits these comments in response to the oral comments made at the public hearings held on February 5 and 6, 2025, and the written public comments submitted during the public comment period ending February 26, 2025, on Iron Pine Solar's Joint Application for a Site Permit and a Route Permit (Joint Application) for the up to 325 megawatt (MW) photovoltaic (PV) solar energy generating facility and associated systems (Solar Project) and 230 kilovolt (kV) high voltage transmission line and associated facilities (Gen-Tie Line) (together, the Project) in Pine County, Minnesota. With this filing, Iron Pine Solar also provides these comments on conditions proposed in the Draft Site Permit and Draft Route Permit.

During the comment period, written comments were submitted by the Minnesota Department of Commerce, Energy Environmental Review and Analysis staff (EERA), the Minnesota Department of Natural Resources (MDNR), the Operating Engineers Local 49 (Local 49) and North Central States Regional Council of Carpenters (Carpenters), LIUNA Minnesota and North Dakota (LIUNA), and members of the public. Iron Pine Solar appreciates the agency and public participation in this docket and the opportunity to offer this response. Iron Pine Solar responds to EERA's comments in Section I below; in Section II, Iron Pine Solar responds to MDNR's comments. Section III includes Iron Pine Solar's response to other comments submitted during the comment period.

As an initial matter, the record demonstrates that the Project has been thoughtfully designed, sited, and routed to avoid and/or minimize human and environmental impacts to the greatest extent practicable. The Project makes efficient use of available land and the solar resource

while minimizing adverse human and environmental impacts, and, overall, the Project complies with the Minnesota Public Utilities Commission's (Commission) siting and routing criteria.

**I. Response to EERA Comments.**

On February 26, 2025, EERA submitted comments on Iron Pine Solar's draft decommissioning plan, draft Vegetation Management Plan (VMP), and responding to Iron Pine Solar's proposed revisions to Draft Site Permit conditions. Iron Pine Solar responds to each topic in turn.<sup>1</sup>

**A. Decommissioning Plan.**

EERA provided comments on Iron Pine Solar's draft decommissioning plan and made recommendations for revisions related to the cover of the plan, decommissioning objective, scheduled updates, project description, use of generation output, permits and notification, tasks and timing, cost estimate, and financial assurance. Iron Pine Solar largely agrees with EERA's comments, but provides the following suggested modification and response to EERA's recommendations:

- **Use of Generation Output.** EERA recommended that the plan be revised to add a header on this topic and brief text clarifying how the generation from the Project will be used. EERA recommended that if any portion of the output is to be sold through a power purchase agreement (PPA), the plan should include the off-taker and the expiration date of the PPA.

The off-taker and expiration date of the PPA has not been finalized at this time. Additionally, Iron Pine Solar notes that the expiration of the PPA may be a trade secret term which may unnecessarily complicate the decommissioning plan, which is typically a public document and must be provided to the local unit of government. Also, Iron Pine Solar interprets this request to be informational only, and not to suggest that the Project would otherwise be decommissioned at the end of the PPA term. Instead, Iron Pine Solar believes that given the 30-year term of the site permit and the opportunity to remarket or repower the Project at the end of any initial PPA term, the more appropriate trigger for decommissioning continues to be the ceasing of operations.

Iron Pine Solar will consider EERA's comments in preparing the updated decommissioning plan.

**B. VMP.**

On behalf of the interagency Vegetation Management Planning Working Group (VMPWG), EERA also provided comments on the Project's draft VMP. EERA noted that the draft VMP is well-organized and generally consistent with Department of Commerce guidance.

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<sup>1</sup> EERA Comments (Feb. 26, 2025) (eDocket No. [20252-215774-01](#)).

Iron Pine Solar appreciates the VMPWG's feedback. Iron Pine Solar remains committed to working with the VMPWG regarding the Project's VMP.

C. Draft Permit Conditions.

In the comments, EERA also acknowledged Iron Pine Solar's suggested revisions to the Draft Site and Route Permits and made additional recommendations on a few permit conditions. Iron Pine Solar maintains its comments filed in the Direct Testimony of Joey Shannon<sup>2</sup> regarding conditions proposed in the Draft Site Permit<sup>3</sup> and Draft Route Permit,<sup>4</sup> and provides these additional comments:

VMP.

In its comments, EERA stated it has no objection to Iron Pine Solar's proposed edits to Section 4.3.17 (Vegetation Management Plan) of the Draft Site Permit, which make identification of the third-party monitor for the VMP a separate filing from the VMP itself. Iron Pine Solar appreciates EERA's comments.

Visual Screening Plan.

In its comments, EERA stated it has no objection to Iron Pine Solar's proposed edits to special condition Section 5.1 (Visual Screening Plan) of the Draft Site Permit. Iron Pine Solar appreciates EERA's comments.

Aesthetics.

In its comments, EERA stated it does not believe Iron Pine Solar's proposed edits to Section 4.3.8 (Aesthetics) of the Draft Site Permit focusing the condition on landowners affected by the visual screening plan contemplated in Section 5.1 (discussed above) are necessary since the condition is a general permit condition applicable to all solar facilities, and it is meant to be general in nature whereas special condition Section 5.1 is more specific and focused on affected landowners adjacent to the Project. Iron Pine Solar appreciates EERA's clarification regarding the scope of this condition and has no objection to maintaining the original language of Section 4.3.8.

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<sup>2</sup> See Ex. IPS-10 at 8-18 (Direct Testimony of J. Shannon).

<sup>3</sup> In the Direct Testimony of Joey Shannon, Iron Pine Solar provided comments on, and in some instances recommended edits to, the following conditions of the Draft Site Permit: Sections 4.3.8 (Aesthetics); 4.3.17 (Vegetation Management Plan); 4.3.13 (Wetlands and Water Resources); 5.1 (Visual Screening Plan); 5.2 (Kettle River Wild and Scenic River District); 5.3 (Snowmobile Trail 187); and 5.4 (Vegetation and Blowing Snow Control). Iron Pine Solar maintains its requested revisions except as stated otherwise in these comments.

<sup>4</sup> In the Direct Testimony of Joey Shannon, Iron Pine Solar provided comments on, and in one instance recommended edits to, the following conditions of the Draft Route Permit: Sections 5.3.9 (Wetlands and Water Resources); and 6.1 (Interstate 35 Crossing). Iron Pine Solar maintains its recommendations as stated in the testimony.

Snowmobile Trail.

In its comments, EERA stated it has no objection to Iron Pine Solar's proposed edits to special condition Section 5.3 (Snowmobile Trail 187) of the Draft Site Permit, but recommended adding additional language to clarify the goal(s) of the coordination between the Iron Pine Solar and the snowmobile club. Iron Pine Solar appreciates EERA's comments and has no objection to the suggested addition. Accordingly, Iron Pine Solar requests that special condition Section 5.3 be revised with the cumulative edits recommended by Iron Pine Solar and EERA:

**5.3 Snowmobile Trail**

The Permittee shall coordinate with the Northern Pine Riders snowmobile club ~~regarding to reroute snowmobile trail 187 and any other snowmobile trails impacted by the project and its use~~ consistent with construction and operation of the project.

**II. Response to MDNR Comments.**

MDNR submitted written comments on February 25, 2025, regarding fencing, lighting, dust control, erosion control, recreational impacts, and the VMP.<sup>5</sup>

A. Security Fencing.

MDNR provided comments on the Solar Project's perimeter fence. Iron Pine Solar appreciates MDNR's comments and will continue to coordinate with MDNR and EERA regarding the Project's security fence. However, Iron Pine Solar respectfully disagrees with MDNR's recommendations as to fence height, the need to implement measures for Wood turtles and Blanding's turtles, a special condition related to fencing, and MDNR's proposed revisions to Section 4.3.32 (Security Fencing) of the Draft Site Permit.

MDNR recommended at least ten-foot-tall security fencing to prevent large wildlife from entering the solar facility. As discussed in the Joint Application and the EA, the fencing that will surround the solar arrays will consist of an approximately "seven- to eight-foot-high woven wire (deer exclusion) fence."<sup>6</sup> This type of fencing is designed to exclude deer. As noted in the EA, deer can jump many fences, although "they can become tangled in both smooth and barbed-wire fences, especially if the wires are loose or installed too closely together."<sup>7</sup> However, there is nothing in the record supporting requiring a ten-foot-high security fence. Further, as reflected in Section 4.3.32 (Security Fencing) of the Draft Site Permit, the security fence should be designed to "minimize the visual impact of the Project." Ten-foot-tall security fencing around the arrays would result in a greater visual impact, with no evidence that it would better exclude deer than

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<sup>5</sup> MDNR Comments (Feb. 25, 2025) (eDocket No. 20252-215765-01).

<sup>6</sup> Ex. EERA-8 at 6 (EA).

<sup>7</sup> Ex. EERA-8 at 92 (EA).

Iron Pine Solar's current design. Additionally, Iron Pine Solar has designed its security fencing based on consultation with the participating landowner, as well as to comply with applicable National Electrical Safety Code (NESC) requirements. The fencing proposed for the Solar Project is consistent with other site permits issued by the Commission.<sup>8</sup>

MDNR also recommended that the security fencing be designed to accommodate the movement of Wood turtles and Blanding's turtles. However, although Wood turtles and Blanding's turtles have been observed approximately three miles from the Project, there is no record of these turtle species being observed in the Project Area or the immediate vicinity. Additionally, the Project Area is primarily peat, which is not typically suitable habitat for these species.<sup>9</sup> There is nothing in the record supporting special measures for these turtle species. Iron Pine Solar will continue to coordinate with MDNR but does not support the special permit condition.

MDNR stated it supports a special permit condition requiring Iron Pine Solar to coordinate with MDNR on finalizing a security fence design. However, MDNR does not provide a suggested special condition, and a special condition is not necessary, because general condition Section 4.3.32 (Security Fencing) of the Draft Site Permit already addresses fencing and requires a permittee to coordinate with the Department of Commerce and MDNR on the final fence plan for the specific site.

Finally, MDNR recommended revising the second sentence of Section 4.3.32 as follows: *The Permittee shall develop a final fence plan for the specific site in coordination with the Department of Commerce and the DNR, and in accordance with security fencing guidance.* Iron Pine Solar believes MDNR's recommended addition is neither necessary nor appropriate. First, the condition already requires coordinating with MDNR on the final fence plan. There is nothing in the condition as currently written preventing MDNR's fencing guidelines from being considered during that coordination. Additionally, the reference to "security fencing guidance" is vague. As stated in the condition, the final fence plan should be developed "for the specific site." Requiring adherence to fencing guidelines does not account for site-specific considerations which are more appropriately discussed during the already-required coordination between the permittee, the Department of Commerce, and MDNR. Further, Iron Pine Solar needs to design the facility,

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<sup>8</sup> See, e.g., *In the Matter of the Application of Northern States Power Co. d/b/a Xcel Energy for a Site Permit for the up to 250 MW Sherco 3 Solar Energy Generating System in Sherburne County, Minnesota*, Order Issuing Site Permit, Site Permit at Section 4.3.32 (July 31, 2024) (PUC Docket No. E-002/GS-23-217) (eDocket No. 20247-209139-01); *In the Matter of the Application of Lake Wilson Solar Energy LLC for a Certificate of Need and a Site Permit for the up to 150 MW Lake Wilson Solar and Associated Battery Storage Project in Murray County, Minnesota*, Order Granting Certificate of Need and Issuing Site Permit, Site Permit at Section 4.3.31 (April 23, 2024) (PUC Docket No. IP-7070/GS-21-792) (eDocket No. 20244-205861-01); *In the Matter of the Application of Byron Solar, LLC for a Certificate of Need, Site Permit, and Route Permit for the up to 200 MW Byron Solar Project and 345 kV Transmission Line in Dodge and Olmsted Counties, Minnesota*, Order Granting Certificate of Need and Issuing Site and Route Permits, Site Permit at Section 4.3.31 (May 1, 2023) (PUC Docket No. IP-7041/GS-20-763) (eDocket No. 20235-195471-02).

<sup>9</sup> See Ex. IPS-10 at 9 (Direct Testimony of J. Shannon).

including the security fencing, to comply with applicable NESC requirements. It is not clear whether the guidance referred to by MDNR here is consistent with NESC requirements. Accordingly, Iron Pine Solar does not recommend revising Section 4.3.32 of the Draft Site Permit.

Iron Pine Solar has demonstrated that the perimeter fencing currently contemplated for the Project is reasonable and Section 4.3.32 of the Draft Site Permit adequately addresses the security fencing, and the record does not contain any contrary evidence. The fencing proposed for the Solar Project is consistent with other site permits issued by the Commission.<sup>10</sup>

B. Lighting.

MDNR recommended adding a special condition to the Draft Site Permit related to lighting of the Project substation and operations and maintenance facility. MDNR provided an example for a recent docket. Iron Pine Solar does not object to a special condition using the language provided by MDNR:

**Facility Lighting**

The Permittee must use shielded and downward facing lighting and LED lighting that minimizes blue hue at the project substation and operations and maintenance facility. Downward facing lighting must be clearly visible on the site plan submitted for the project.

C. Dust Control.

MDNR also recommended adding a special condition to the Draft Site Permit related to the use of non-chloride products. MDNR provided an example for a recent docket. Iron Pine Solar does not object to a special condition using the language provided by MDNR:

**Dust Control**

The Permittee shall utilize non-chloride products for onsite dust control during construction.

D. Wildlife-Friendly Erosion Control.

MDNR also recommended adding a special condition to the Draft Site Permit related to the use of wildlife-friendly erosion control measures and the use of mulch products without green dye. Iron Pine Solar does not object to a special condition using the language provided by MDNR:

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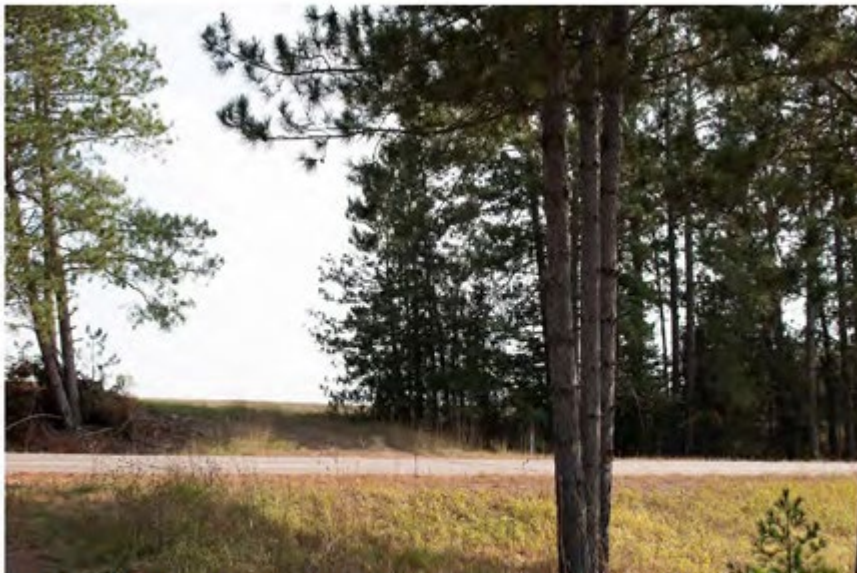
<sup>10</sup> See *supra* note 8.

### **Wildlife-Friendly Erosion Control**

The Permittee shall use only “bio-netting” or “natural netting” types of erosion control materials and mulch products without synthetic (plastic) fiber additives or malachite green dye.

#### **E. Recreational Impacts.**

MDNR noted that the west edge of the Solar Project will be visible from the Willard Munger Hinckley-Carlton State Trail (Snowmobile Trail 235) and stated that MDNR supports a vegetative buffer to mitigate viewshed disruptions to the trail. However, as shown on Figure 4-1 of the EA, existing vegetative screening consisting of primarily evergreen trees provides a visual barrier along almost the entirety of the area where the trail runs adjacent to the Solar Project boundary. Figure 4-1 of the EA, excerpted below for reference, shows the only gap in the existing vegetative screening; this area provides access for passage of farm equipment to the farm field from County Highway 61.



**Figure 4-1** Development Area Existing Conditions Facing East from Willard Munger Hinckley-Carlton State Trail

This small gap in the existing vegetative screening is within the county road right-of-way. Figure 4-2, excerpted below for reference, from the Environmental Assessment (EA) is a visual rendering showing the Project in this area; as shown on that figure, visual impacts will be minimal.





Figure 4-2 Development Area with Proposed Solar Facility Facing East from Willard Munger Hinckley-Carlton State Trail

Further, Iron Pine Solar notes that under Section 4.3.8 of the Draft Site Permit, Iron Pine Solar is already required to consider input pertaining to visual impacts from the local unit of government having direct zoning authority over the area in which the Project is located. Iron Pine Solar is committed to working with Pine County and Kettle River Township to address concerns regarding visual impacts to this trail, including by providing additional screening in this area if requested and consented to by the county since it would implicate an area within the county's road right-of-way. Because aesthetic impacts will be minimal and can be addressed through consultation with the county and township, and because the area identified by MDNR for screening is not within Iron Pine Solar's control, Iron Pine Solar does not support MDNR's recommendation.

MDNR also advised that plants and trees included in a visual screening plan be native to the area and avoid species that tend to aggressively reseed and overtake prairies and grassy areas. As discussed in the Joint Application and detailed in Iron Pine Solar's draft VMP, Iron Pine Solar anticipates using native species.<sup>11</sup> Iron Pine Solar appreciates MDNR's recommendation and will incorporate this into any visual screening plans implemented as part of the Project.

F. VMP.

MDNR provided comments on the draft VMP. MDNR recommended that the final VMP be developed in accordance with MDNR's recently revised *Prairie Establishment & Maintenance Technical Guidance for Solar Projects*. Iron Pine Solar has reviewed this updated guidance. Iron

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<sup>11</sup> See Ex. IPS-3 at 61 and Appendix E (Joint Application).



Pine Solar appreciates MDNR's recommendation and will continue to coordinate with the VMPWG on the Project's VMP.

### **III. Response to Other Comments.**

#### **A. Response to Comments at Public Hearings.**

At the in-person public hearing on February 5, 2025, comments were made by members of the public, as well as members of LIUNA, Local 49, and Carpenters. At the virtual public hearing on February 6, 2025, comments were made by two members of the public. Comments and questions focused on aesthetics, groundwater, drainage, weather pattern changes, hunting, interconnection and off-takers, emergency response, decommissioning, and Project benefits. Iron Pine Solar responded to questions at the public hearings, as applicable.

The members of LIUNA, Local 49, and Carpenters provided comments in support of the Project. Iron Pine Solar appreciates these organizations' support.

#### **B. Response to Other Written Comments.**

##### *1. Comments by Thomas and Lisa Frank.*

Neighboring landowners Thomas and Lisa Frank submitted comments on January 30, 2025, related to the siting of the Solar Project and potential impacts on wildlife, property values, and water runoff.<sup>12</sup>

##### *i. Siting of the Solar Project.*

The Franks commented on the size and footprint of the Project and asked whether Iron Pine Solar considered concentrating facility placement towards the center of the Project Area to minimize impacts on neighboring landowners. The Franks also expressed disagreement with the constraint preventing Project components from being placed farther into the Kettle River Scenic Byway, stating that the Kettle River is not visible from that portion of the Project Area anyway and such placement would be favorable for neighboring landowners. Iron Pine Solar has been coordinating with the Franks regarding the Project and appreciates their participation in this process.

As described in the Joint Application, Iron Pine Solar chose the Project Area to build the Project due to minimal impact to natural and cultural resources, proximity to the electrical grid and existing transmission infrastructure, strong solar resource, strong landowner support and willing landowner participation, and consistency with existing land uses. As described in the Joint Application, testimony, and the EA, there are a number of constraints around where within the Project Area facilities can be placed. For example, there is a designated floodplain in the southern

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<sup>12</sup> Comment by Thomas and Lisa Frank (Jan. 30, 2025) (eDocket No. [20251-214691-01](#)).

portion of the Project Area, and the Kettle River Wild & Scenic River district covers a portion of the southwestern part of the Project Area; no Project facilities are located with these areas. Iron Pine Solar designed the Project to minimize impacts to the environment and landowners while maximizing the efficiency of the Project, including efficient use of the land under voluntary easement or option for the Project. Iron Pine Solar is committed to working with adjacent landowners to minimize the potential aesthetic impacts.<sup>13</sup>

Additionally, the Franks expressed displeasure at the proximity of Project facilities to two parcels owned by the Franks, including a laydown yard and solar arrays in the southeastern portion of the Solar Project Area at the intersection of County Highway 33 and I-35. As noted in testimony, based on concerns from a neighboring landowner regarding traffic during construction, Iron Pine Solar moved the location of the temporary laydown yard previously proposed to be located there to an area in the western portion of the Project adjacent to County Highway 61. Iron Pine Solar is committed to continuing to work with adjacent landowners to minimize the potential aesthetic impacts.

ii. Wildlife.

The Franks also commented regarding potential impacts to wildlife. As discussed in the EA, wildlife using the Project Area are accustomed to disturbance and human activities due to the existing agricultural uses, and impacts are anticipated to be temporary and minimal.<sup>14</sup> Additionally, following construction the Solar Project Area will be restored and largely covered with native perennial vegetation; this vegetative cover would likely benefit many species that prefer this habitat type over agricultural cover.<sup>15</sup> The Draft Site and Route Permits also contain several conditions providing for measures that will be implemented to minimize impacts to wildlife.

iii. Property Values.

The Franks express concerns regarding potential impacts to their property values. As discussed in the EA, based on analysis of other utility-scale solar projects, significant negative impacts to property values in the vicinity of the Project vicinity are not anticipated.<sup>16</sup> For example, the EA notes that “[t]he Chisago County Assessor reported that the 1,000-acre rural solar energy project, referred to as North Star, has had no apparent negative impact on surrounding property values according to the value of sales of properties near North Star between January 2016 and

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<sup>13</sup> See Ex. IPS-10 at 12 (Direct Testimony of J. Shannon).

<sup>14</sup> Ex. EERA-8 at 91 (EA).

<sup>15</sup> Ex. EERA-8 at 92, 109 (EA).

<sup>16</sup> Ex. EERA-8 at 53 (EA).

October 2017.”<sup>17</sup> Iron Pine Solar remains committed to continuing to work with adjacent residences to develop and implement visual screening plans specific to the adjacent residences.<sup>18</sup>

iv. Water Runoff.

The Franks state a concern regarding water runoff into the Kettle River watershed. However, Iron Pine Solar will implement a stormwater management plan as part of the Project, which will include measures to avoid and/or minimize potential impacts to water resources. Additionally, Iron Pine Solar will obtain coverage from the Minnesota Pollution Control Agency (MPCA) under a National Pollutant Discharge Elimination System (NPDES)/State Disposal System (SDS) construction stormwater permit, which requires a Stormwater Pollution Prevention Plan (SWPPP) to be developed and implemented prior to construction. Best management practices to minimize potential impact on surface waters will be utilized as a part of the SWPPP, including but not limited to sediment control, revegetation plans, and management of exposed soils to prevent sediment from entering waterbodies. Because the Project will disturb more than 50 acres where stormwater will discharge within one mile of special waters, the SWPPP would be submitted to MPCA for review and approval prior to construction.<sup>19</sup>

2. *Comments by Other Members of the Public.*

Through the close of the comment period on February 26, 2025, 30 written comments were submitted from other members of the public.<sup>20</sup> These comments recognized the Project’s ability to enhance energy resiliency, generate significant annual tax revenue over the life of the Project, and provide reliable income for landowners who choose to lease their land for Project facilities. Iron Pine Solar appreciates these commenters’ support.

3. *Comments by Labor Organizations.*

Local 49, Carpenters,<sup>21</sup> and LIUNA<sup>22</sup> filed written comments expressing support for the Project. The comments recognized the Project’s ability to provide economic and labor benefits for local workforces. Iron Pine Solar appreciates these organizations’ support.

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<sup>17</sup> Ex. EERA-8 at 53 (EA).

<sup>18</sup> Ex. IPS-3 at 49 (Joint Application); Ex. IPS-10 at 12 (Direct Testimony of J. Shannon).

<sup>19</sup> Ex. EERA-8 at 10 (EA).

<sup>20</sup> See Public Comment Batch (Feb. 5, 2025) (containing four written comments) (eDocket No. 20252-214989-01); Public Comment Batch (Feb. 6, 2025) (containing twelve written comments) (eDocket No. 20252-215045-01); Public Comment Batch (Feb. 10, 2025) (containing eight written comments) (eDocket No. 20252-215140-01); Joseph Wenzel Comment (Feb. 12, 2025) (eDocket No. 20252-215289-01); Public Comment Batch (Feb. 13, 2025) (containing four written comments) (eDocket No. 20252-215352-01); Tim Donovan Comment (Feb. 19, 2025) (eDocket No. 20252-215508-01).

<sup>21</sup> Local 49 and Carpenters (Feb. 26, 2025) (eDocket No. 20252-215787-01).

<sup>22</sup> LIUNA Comments (Feb. 27, 2025) (eDocket No. 20252-215807-01).

**IV. Conclusion.**

Iron Pine Solar appreciates this opportunity to provide these comments on the proposed site and route permit conditions and to reply to the oral comments at the public hearings and the written comments submitted during the public comment period. Because the record supports doing so, Iron Pine Solar respectfully requests that the Administrative Law Judge recommend that the Commission issue a site and route permit for the Project.

These comments have been e-filed through [www.edocket.state.mn.us](http://www.edocket.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 would like to have further conversation after receipt of this correspondence.

Sincerely,

FREDRIKSON & BYRON, P.A.

*/s/ Haley Waller Pitts*

Haley L. Waller Pitts  
**Direct Dial:** 612.492.7443  
**Email:** [hwallerpitts@fredlaw.com](mailto:hwallerpitts@fredlaw.com)

**In the Matter of Iron Pine Solar Power,  
LLC's Joint Application for a Site Permit  
and Route Permit for a 325-MW Solar  
Energy Generation System and a 230-kV  
HVTL Gen-Tie Line in Pine County,  
Minnesota.**

**CERTIFICATE OF SERVICE**

**MPUC Docket No. IP-7114/GS-23-414;  
IP-7114/TL-23-415  
OAH Docket No. 22-2500-40198**

Maia Martinez certifies that on the 12th day of March, 2025, she e-filed on behalf of Iron Pine Solar Power, LLC, a true and correct copy of the Response to Public Hearing Comments with the Minnesota Public Utilities Commission via eDockets ([www.edockets.state.mn.us](http://www.edockets.state.mn.us)). Said documents were also served on the Official Service Lists of record on file with the Minnesota Public Utilities Commission and as attached hereto.

Executed on: March 12, 2025

Signed: /s/ Maia Martinez

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  | 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               | 23-414Official CC Service List |
| 2  | Bridget        | Duffus                         | bduffus@fredlaw.com                  |              | Fredrikson & Byron, P.A.  | 60 S Sixth St Ste 1500 Minneapolis MN, 55402-4400 United States       | Electronic Service |                           | No                | 23-414Official CC Service List |
| 3  | 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                | 23-414Official CC Service List |
| 4  | Breann         | Jurek                          | bjurek@fredlaw.com                   |              | Fredrikson & Byron PA   | 60 S Sixth St Ste 1500 Minneapolis MN, 55402 United States            | Electronic Service |                           | No                | 23-414Official CC Service List |
| 5  | Richard        | Kolodziejski                   | rkolodziejski@ncsrcc.org             |              | North Central States Regional Council of Carpenters             | 700 Olive St St. Paul MN, 55130 United States                         | Electronic Service |                           | No                | 23-414Official CC Service List |
| 6  | Stacy          | Kotch Egstad                   | stacy.kotch@state.mn.us              |              | MINNESOTA DEPARTMENT OF TRANSPORTATION                          | 395 John Ireland Blvd. St. Paul MN, 55155 United States               | Electronic Service |                           | No                | 23-414Official CC Service List |
| 7  | Christa        | Moseng                         | christa.moseng@state.mn.us           |              | Office of Administrative Hearings                               | P.O. Box 64620 Saint Paul MN, 55164-0620 United States                | Electronic Service |                           | Yes               | 23-414Official CC Service List |
| 8  | 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                | 23-414Official CC Service List |
| 9  | 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               | 23-414Official CC Service List |
| 10 | Nathaniel      | Runke                          | nrunke@local49.org                   |              |   | 611 28th St. NW Rochester MN, 55901 United States                     | Electronic Service |                           | No                | 23-414Official CC Service List |
| 11 | Will           | Seuffert                       | will.seuffert@state.mn.us            |              | Public Utilities Commission                                     | 121 7th Pl E Ste 350 Saint Paul MN, 55101                             | Electronic Service |                           | Yes               | 23-414Official CC              |



| #  | First Name | Last Name      | Email                           | Organization             | Agency | Address   | Delivery Method    | Alternate Delivery Method | View Trade Secret | Service List Name              |
|----|------------|----------------|---------------------------------|--------------------------|--------|---|--------------------|---------------------------|-------------------|--------------------------------|
|    |            |                |                                 |                          |        | United States   |                    |                           |                   | Service List                   |
| 12 | Janet      | Shaddix Elling | jshaddix@janetshaddix.com       | Shaddix And Associates   |        | 7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States    | Electronic Service |                           | Yes               | 23-414Official CC Service List |
| 13 | Joey       | Shannon        | jshannon@swiftcurrentenergy.com | Swift Current Energy     |        | 510 Bering Drive, Suite 300 Houston TX, 77057 United States     | Electronic Service |                           | No                | 23-414Official CC Service List |
| 14 | Haley      | Waller Pitts   | hwallerpitts@fredlaw.com        | Fredrikson & Byron, P.A. |        | 60 S Sixth St Ste 1500 Minneapolis MN, 55402-4400 United States | Electronic Service |                           | No                | 23-414Official CC Service List |
| 15 | Erika      | Wilder         | e_wilder@yahoo.com              |                          |        | 1201 Yale Pl Minneapolis MN, 55403 United States                | Electronic Service |                           | No                | 23-414Official CC Service List |

| #  | First Name     | Last Name                      | Email                                | Organization  | Agency  | Address   | Delivery Method    | Alternate Delivery Method | View Trade Secret | Service List Name              |
|----|----------------|--------------------------------|--------------------------------------|---|---|---|--------------------|---------------------------|-------------------|--------------------------------|
| 1  | 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               | 23-415Official CC Service List |
| 2  | Bridget        | Duffus                         | bduffus@fredlaw.com                  | Fredrikson & Byron, P.A.                            |   | 60 S Sixth St Ste 1500 Minneapolis MN, 55402-4400 United States       | Electronic Service |                           | No                | 23-415Official CC Service List |
| 3  | 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                | 23-415Official CC Service List |
| 4  | Breann         | Jurek                          | bjurek@fredlaw.com                   | Fredrikson & Byron PA                               |   | 60 S Sixth St Ste 1500 Minneapolis MN, 55402 United States            | Electronic Service |                           | No                | 23-415Official CC Service List |
| 5  | Richard        | Kolodziejski                   | rkolodziejski@ncsrcc.org             | North Central States Regional Council of Carpenters |   | 700 Olive St St. Paul MN, 55130 United States                         | Electronic Service |                           | No                | 23-415Official CC Service List |
| 6  | Stacy          | Kotch Egstad                   | stacy.kotch@state.mn.us              |   | MINNESOTA DEPARTMENT OF TRANSPORTATION                          | 395 John Ireland Blvd. St. Paul MN, 55155 United States               | Electronic Service |                           | No                | 23-415Official CC Service List |
| 7  | Christa        | Moseng                         | christa.moseng@state.mn.us           |   | Office of Administrative Hearings                               | P.O. Box 64620 Saint Paul MN, 55164-0620 United States                | Electronic Service |                           | Yes               | 23-415Official CC Service List |
| 8  | 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                | 23-415Official CC Service List |
| 9  | 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               | 23-415Official CC Service List |
| 10 | Nathaniel      | Runke                          | nrunke@local49.org                   |   |   | 611 28th St. NW Rochester MN, 55901 United States                     | Electronic Service |                           | No                | 23-415Official CC Service List |
| 11 | Will           | Seuffert                       | will.seuffert@state.mn.us            |   | Public Utilities Commission                                     | 121 7th Pl E Ste 350 Saint Paul MN, 55101                             | Electronic Service |                           | Yes               | 23-415Official CC              |

| #  | First Name | Last Name      | Email                           | Organization             | Agency | Address   | Delivery Method    | Alternate Delivery Method | View Trade Secret | Service List Name              |
|----|------------|----------------|---------------------------------|--------------------------|--------|---|--------------------|---------------------------|-------------------|--------------------------------|
|    |            |                |                                 |                          |        | United States   |                    |                           |                   | Service List                   |
| 12 | Janet      | Shaddix Elling | jshaddix@janetshaddix.com       | Shaddix And Associates   |        | 7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States    | Electronic Service |                           | Yes               | 23-415Official CC Service List |
| 13 | Joey       | Shannon        | jshannon@swiftcurrentenergy.com | Swift Current Energy     |        | 510 Bering Drive, Suite 300 Houston TX, 77057 United States     | Electronic Service |                           | No                | 23-415Official CC Service List |
| 14 | Haley      | Waller Pitts   | hwallerpitts@fredlaw.com        | Fredrikson & Byron, P.A. |        | 60 S Sixth St Ste 1500 Minneapolis MN, 55402-4400 United States | Electronic Service |                           | No                | 23-415Official CC Service List |