

February 26, 2025

Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101-2147

RE: EERA Supplemental Comments and Recommendations on Application Completeness  
Castle Rock Solar Project  
Docket No. IP-7137/GS-24-267

Dear Mr. Seuffert,

Department of Commerce, Energy Environmental Review and Analysis (EERA) staff provides these supplemental comments and recommendations in the following matter:

In the Matter of the Application of Castle Rock Solar LLC for a Site Permit for the up to 150 MW Birch Coulee Solar Project in Dakota County, Minnesota

On January 16, 2025, Castle Rock Solar, LLC (Castle Rock Solar) filed a site permit application to construct and operate the Castle Rock Solar project, an up to 150 megawatt (MW) solar farm in Dakota County, Minnesota. On January 22, 2025, the Minnesota Public Utilities Commission (Commission) issued a notice soliciting comments on the completeness of the application and related procedural matters. The Commission issued a notice extending the application completeness comment period on February 3, 2025.

On February 14, 2025, EERA staff filed comments on application completeness; EERA staff recommended that the Commission accept Castle Rock Solar's site permit application as substantially complete but requested Castle Rock Solar provide a discussion of greenhouse gas (GHG) emissions associated with the project and their potential impacts, the full NHIS report including cover page(s) from the Minnesota DNR (DNR), and additional information regarding the private airstrip near the project.<sup>1</sup> On February 21, 2025, Castle Rock Solar filed reply comments addressing EERA staff's request to provide project GHG emissions and impacts, the NHIS report, and information on the private airstrip.<sup>2</sup>

EERA staff has reviewed Castle Rock Solar's reply comments. Staff finds that the reply comments provide the GHG, NHIS, and airstrip information required for a site permit application. Castle Rock

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<sup>1</sup> EERA, Comments on Application Completeness, February 14, 2025, eDockets Number [20252-215393-01](#).

<sup>2</sup> Castle Rock Solar Project, Completeness Reply Comments, February 21, 2025, eDockets Number [20252-215671-01](#) (through -04).

Solar's reply comments provide: 1) a summary of estimated GHG emissions during construction, operations, and decommissioning and their potential impacts, 2) the complete NHIS report from the DNR, and 3) information regarding potential takeoffs or landings on the private airstrip near the project. EERA staff finds that Castle Rock Solar's reply comments adequately address EERA's request for project GHG emissions, the NHIS report, and private airstrip information. Staff recommends that the Commission find Castle Rock Solar's site permit application to be complete.

Sincerely,

A handwritten signature in black ink, appearing to read "Lauren Agnew". The signature is written in a cursive, flowing style.

Lauren Agnew  
Environmental Review Manager