



Murray County Board of Commissioners
2848 Broadway Ave. PO Box 57
Slayton, MN 56172

November 18, 2025

Ms. Sasha Bergman
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

RE: PUC Docket Numbers: E002/CN-23-212, E002/RP-24-67, E002/M-24-195

Dear Ms. Bergman:

In March 2023, Murray County submitted comments regarding the 2021 Minnesota Biennial Transmission Projects Report, noting that Murray County experienced, and continues to experience, curtailments that were said to be due to economic dispatch drivers and inadequacies of transmission lines in our region.

Wind and Solar Developers continue to seek land easements within our jurisdictional boundaries for more and more wind, solar, and battery projects, even when existing wind farms are being curtailed. One solar project that has begun preliminary construction, Lake Wilson Solar, includes a Battery Energy Storage System (BESS) designed to capture the excess energy generated from the solar farm, as well as from the curtailed wind farms, such as Fenton Wind Farm. Based on recently submitted documents to the above referenced PUC Docket Numbers, it appears that the future of the Lake Wilson Solar Project, albeit still well positioned to move forward, but may be at risk of being delayed, exposing the local units of government to more years of unnecessary curtailment and lost property and/or production tax revenue. When there are changes in the state permitted energy projects, the County's only recourse is to seek assistance from the PUC.

Murray County is at the mercy of wind and solar developers, large scale utility companies, and the PUC, because the county does not have contracts, leases, or power purchase agreements for energy projects. Utility scale projects, of which there are a number of existing ones and even more proposed ones, have direct impacts on not only the use of land within the county, but also the financial impact on the County and Township budgets; landowners and facility owners may still get paid, but local governments do not. Production tax revenue is in lieu of property tax for utility scale energy generating facilities. If a project is curtailed, payments to local governments are reduced.

District 1
Loy Woelber

District 2
Mark Carlson

District 3
Dennis Welgraven

District 4
Jackie Meier

District 5
Roger Zins

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It has been well documented that the Nobles Substation deficiencies are harming local governments, and Xcel is very aware of the situation that has been going on for several years. If the Lake Wilson Solar BESS was designed to help reduce the amount of curtailment in southwest Minnesota, why would Xcel be allowed to stop pursuing a power purchase agreement for this project and yet move forward with a BESS for the Sherco project that will not help the congestion here?

Our understanding of the Lake Wilson Solar project was that the energy generated from this solar project would complement the energy generated by the existing wind farms; wind and solar would power the batteries so that when the sun is not shining, the excess energy in the batteries would help with consistency of electricity on the lines. According to page 2 of Appendix C of Docket No. E999/M-25-99, Item #5 Economic Study Analysis noted that Xcel Energy analyzed 2024 Data using a 300 MW BESS interconnected to the Nobles County Substation and its impact on curtailment. It was estimated that the 300 MW of BESS would account for a 25% reduction from curtailments.

Murray County has participated in multiple conversations with the PUC as part of the Regional Transmission Organization (RTO) Biennial Transmission Plan and the challenges associated with curtailment, transmission line congestion, and fiscal impacts to local governments. In all instances, the PUC supported a swift resolution. Xcel has a battery option central to the congestion and appears to not be moving forward but instead is replacing the project with batteries far away from the issue and non-renewable energy sources. We ask the PUC to scrutinize that decision considering local government factors and the previous dockets Murray County participated in.

Thank you for your consideration and please feel free to contact us with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dennis Welgraven', with a long horizontal flourish extending to the right.

Dennis Welgraven
Chair, Murray County Board of Commissioners

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