

October 24, 2024

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

RE: Snowshoe Energy Storage Project  
Public Utilities Commission Docket Number: IP-7138/ESS-24-279

Dear Secretary Seuffert:

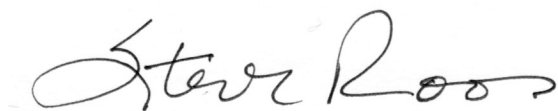
On behalf of Commissioner Petersen, Minnesota Department of Agriculture (MDA) appreciates the opportunity to provide comment on the Snowshoe Energy Storage Project, proposed by Spearmint Energy, in Olmsted County Minnesota.

MDA's role in reviewing energy projects under the regulatory authority of the Minnesota Public Utility Commission (PUC) is outlined in Minnesota Statutes 2023, section 216E.10, subdivision 3(b), which charges MDA with the responsibility of working with project applicants to prepare an Agricultural Impact Mitigation Plan (AIMP) for projects proposed to be sited on agricultural land.

MDA recognizes that stand-alone Battery Energy Storage Systems (BESS) are new to Minnesota and this project is unique in that it is the first stand-alone BESS to come before the PUC. That said, based on MDA's responsibilities cited above and the fact that this project is proposed on agricultural land, we will require that Snowshoe BESS, LLC, develop an AIMP in collaboration with MDA. We realize that determining the scope of issues that need to be covered in an AIMP for this type of project will involve discussions with the project proposer, PUC staff, and EERA staff. However, we expect that the scope will be determined in a timely manner. We encourage the project proposer and other interested parties to reach out to us at their earliest convenience.

If you have any questions about MDA's comments, please feel free to contact me.

Sincerely,



Stephan Roos  
Environmental Planner

Energy and Environment Section  
651-201-6631  
[stephan.roos@state.mn.us](mailto:stephan.roos@state.mn.us)

cc: Commissioner Thom Petersen, MDA  
Bret Eknes, Minnesota Public Utilities Commission  
Ray Kirsch, Minnesota Department of Commerce  
Suzanne Steinhauer, Minnesota Department of Commerce