

Appendix D
Solar Size Determination Form and Response

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September 13, 2024

Preston Riewer
Otter Tail Power Company
215 S. Cascade St.
Fergus Falls, MN 56537

Dear Mr. Riewer,

Thank you for submitting a solar size determination request for Otter Tail Power's proposed 66 megawatt (MW) Solway solar project in Beltrami County.

The Department is responsible for reviewing such requests to determine whether a combination of solar energy generating systems meets the definition of large electric power generating plant such that a proposed project is subject to the siting authority of the Minnesota Public Utilities Commission (Commission).

Based on information provided by Otter Tail Power and based on criteria established in Minn. Statute 216E.021, the Department has determined that the Solway solar project is not associated with other planned solar projects in a way that would require them to be combined into a single project. However, given that the project on its own has a generating capacity of up to 66 MW, the Department determines that the project is subject to the Commission's siting authority and must submit an application for a site permit under the Power Plant Siting Act (Minnesota Statute 216E).

Per Minn. Statute 216E.021, Otter Tail Power has the right to dispute this determination with the Chair of the Commission.

Please contact me with any questions.

Sincerely,



Ray Kirsch
Energy Environmental Review and Analysis

cc: Bret Eknes, Public Utilities Commission

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Solar Energy Generating System Size Determination Form

Minnesota Statute § 216E.021 requires combining proposed solar energy generating systems for permitting purposes when certain conditions exist. The Department of Commerce requires the information requested below to determine 1) whether proposed solar energy generating systems meet the definition of a large electric power generating plant and, therefore, are subject to the Public Utilities Commission's siting authority; or 2) whether large electric power generating plants that are solar energy generating systems should be combined for permitting purposes. Based on the information provided, Commerce staff may require additional information to make a determination.

Instructions: Answer each question completely. Each question and answer must be clearly identified. Attach maps and supporting information as necessary. Return the signed and dated information to:

Ray Kirsch
Minnesota Department of Commerce
85 Seventh Place East, Suite 280
Saint Paul, MN 55101-2198

Phone: (651) 539-1841
Fax: (651) 539-0109
Email: raymond.kirsch@state.mn.us

Note: This form can be made available electronically, and submitted as an electronic document.

A. Project Description

Briefly describe the proposed project or projects, including name(s); need for the project(s); number of solar energy generating systems; alternating current nameplate capacity of the individual solar energy generating systems identified; and the combined alternating current nameplate capacity.

Otter Tail Power Company (Otter Tail) proposes to construct and operate an up to 66 megawatt (MWac) photovoltaic (PV) solar energy generating facility and associated facilities in Lammers Township in Beltrami County (Project). Otter Tail will be submitting an application to the Minnesota Public Utilities Commission (Commission) for an up to 66 MW alternating current of nameplate solar-energy capacity and supporting infrastructure.

The Project will be located in Beltrami County, and the Project area spans approximately 487 acres. Otter Tail will utilize a surplus interconnection at its Solway Generating Station which will have a Point of Interconnection limitation of 50 MW.

The Project is necessary to meet the growing demand for additional renewable resources required to meet the Carbon-free Energy and Renewable Energy Standards set forth in Minnesota Statutes and other clean energy requirements in Minnesota. Addition of the Solway Solar Project is also consistent with the Commission's July 22, 2024 Order in Otter Tail's 2023-2037 Integrated Resource Plan, which identified a need to acquire or build no less than 200 MWs of solar resources with a commercial operation date of November 1, 2027, or as soon as practicable thereafter.

B. Project Design and Location

Provide the following information regarding each solar energy generating system:

B-1. Describe the 1) solar generating equipment and associated facilities; 2) project boundary location(s) (county, township, and sections); 3) the area within the project boundary (acres); and 4) area within the project boundary that will be developed for the solar project (acres).

1) *The Project will include:*

- *Solar modules and tracking racking systems;*
- *Inverters;*
- *An electrical collection system;*
- *A Project substation and interconnection facilities;*
- *Gravel access roads;*
- *Perimeter fencing and gates;*
- *An operations and maintenance building;*
- *Weather stations;*
- *Stormwater drainage basins; and*
- *Temporary facilities such as laydown areas, temporary site offices, parking, and improvements for storage and staging of equipment prior to installation as needed.*

2) *The Project is in Lammers Township, in Beltrami County, Minnesota, located just north of the City of Solway. Table 1 provides the Township, Range, and Sections of areas included within the respective political boundary.*

Table 1 Townships, Ranges, and Sections areas included within the Project Boundary

Township Name	Township	Range	Sections
Lammers Township	147 N	35 W	04, 07–11, 14–23, and 27–29

3) *The area within the project boundary is planned for approximately 487 acres.*

4) *The area that is planned to have solar facilities is approximately 240 acres.*

B-2. Describe the anticipated point of electrical interconnection. Describe interconnection requests and the status of each request. Provide any assigned project or queue interconnection numbers.

The anticipated point of interconnection is the existing Solway substation. Otter Tail submitted a surplus interconnection request to the Midcontinent Independent System Operator (MISO) for 50 MW on July 8, 2024. The request is being studied with anticipated generator interconnection agreement in Q3 2025. The Project is sized at up to 66 MWac to allow the Project to deliver the maximum amount of energy deliverable under Otter Tail's existing 50 MW interconnection rights. The total capacity delivered to the grid will be limited to 50 MWs under the terms of the expected interconnection agreement.

B-3. Provide a map showing the proposed facility boundary, the interconnection site, anticipated solar module layout, and associated facilities. “Associated facilities” includes access roads, operation and maintenance facilities, collector and feeder lines, and substations. Maps should be at 1:24,000 scale using an imagery basemap. The map must include a legend and scale bar.

See attached maps.

C. Project Characteristics

Provide the following information regarding each solar energy generating system:

C-1. List and describe the entity responsible for constructing the project.

Otter Tail is developing the Project. Otter Tail has not yet selected a contractor for construction of the Project.

C-2. List and describe the entity responsible for operating and maintaining the project.

Otter Tail will be responsible for operating and maintaining the Project.

C-3. Describe the ownership structure, sales agreement(s), interconnection(s), revenue sharing, debt or equity financing, and any other characteristics of the solar energy generating system. Include a statement indicating whether these characteristics are “independent” or “shared.” If shared, indicate with what existing or proposed project.

The Project will be an Otter Tail Power company-owned solar facility and is not sharing interconnection or financing agreements with other solar facilities.

C-4. Provide the anticipated schedule for completion, including dates for permitting, construction (start and end dates), and commercial operation.

Otter Tail anticipates filing an application with the Commission in Q4 of 2024 in order to facilitate a start of construction in late 2025. Otter Tail currently anticipates a 2026 in-service date for the Project.

D. Applicant Information

D-1. Provide the name, address, email, and telephone number of the applicant and any authorized representative.

*Otter Tail Power Company
215 S. Cascade St.
Fergus Falls, MN 56537
Phone: (218)-739-8582*

Representatives:

Preston Riewer, priewer@otpc.com

Otter Tail Power
215 S. Cascade St.
Fergus Falls, MN 56537
Phone: (218)-739-8582

Christina K. Brusven, cbrusven@fredlaw.com
Fredrikson & Byron, P.A.
60 South Sixth Street, Suite 1500
Minneapolis, MN 55402-4400
Phone: 612-492-7412

D-2. Provide the name, address, e-mail, and telephone number of the person or persons who would prepare the application to the Public Utilities Commission or to a Minnesota county or local unit of government, if such an application would be prepared by an agent or consultant of the applicant.

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Christina K. Brusven, cbrusven@fredlaw.com
Fredrikson & Byron, P.A.
60 South Sixth Street, Suite 1500
Minneapolis, MN 55402-4400
Phone: 612-492-7412

Ryan Swanson, ryan.swanson@hdrinc.com
HDR, Inc.
1601 Utica Avenue South, Suite 600
St. Louis Park, MN 55416-3400
Phone: 763.278.5904

D-3. Briefly describe the applicant's business entity including its ownership and financial structure.

Otter Tail in an investor-owned electric utility that will own the Project.

Otter Tail Power Company (OTP) is a wholly owned operating company of Otter Tail Corporation (OTC). OTC is a diversified company with holdings in a variety of industries and is listed on the NASDAQ as OTTR. OTP is an electric utility headquartered in Fergus Falls Minnesota. OTP's operations include the production, transmission, distribution and sale of electric energy to approximately 130,000 customers throughout a 70,000 square mile area across Minnesota, North Dakota, and South Dakota. OTP has ownership in two coal-fired plants, several wind energy centers, one solar farm, multiple natural gas/oil peaking plants and several hydro-electric generating plants.

D-4. Provide the Minnesota Secretary of State organizational ID number for the applicant business entity, all subordinate entities, and all solar developer entities involved with the project.

Otter Tail Power Company's Minnesota Secretary of State organizational ID number is 26525-AA.

D-5. Identify and provide contact information for the person or persons who would be the permittees, if different than the applicant, if the solar energy generating systems were permitted by the Public Utilities Commission or a Minnesota county.

N/A

E. Other Projects in Minnesota

E-1. Identify any planned or existing solar energy generating system(s) in Minnesota in which the applicant, or a principal, partner, or affiliate of the applicant, has an ownership or other financial interest. Describe any facilities identified, including their location, alternating current nameplate capacity, and their interconnection requests.

Otter Tail owns and operates the existing 49.9 MW Hoot Lake Solar Project near Fergus Falls, Minnesota.

Otter Tail also owns one other existing small (33.3 kW-ac) solar energy generating system in Minnesota. It is in Rush Lake township in Otter Tail County and is interconnected to the OTP distribution system at the Rush Lake substation. The interconnection queue number is D19-06.

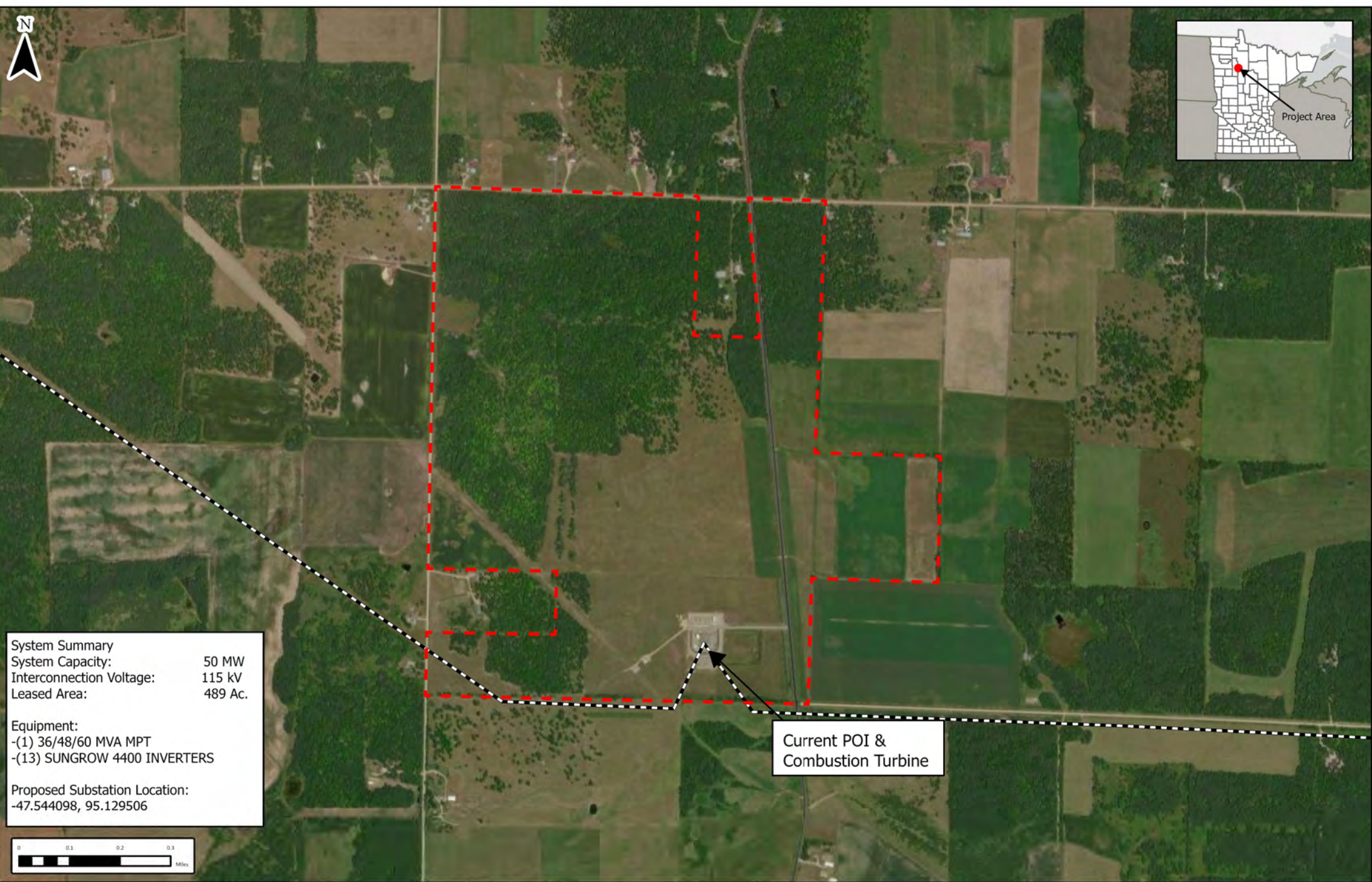
E-2. Identify any additional solar energy generating system(s) in Minnesota in which the applicant, or principal, partner, or affiliate of the applicant, has an ownership or other financial interest and is currently under construction or construction is planned to begin within 12 months of the proposed project(s) estimated completion date. Describe any facilities identified, including their location, alternating current nameplate capacity, and their interconnection requests.

Otter Tail is currently permitting, constructing, and energizing fifteen – 40 kW solar energy generating systems across our Minnesota distribution system per the order in docket E-017/M-23-338.

Otter Tail is also in the process of acquiring distributed solar energy resources to fulfill its obligations under Minn. Stat. 216B.1691, subd.2h. Resources will be selected as part of a bidding process and have not yet been identified.

E-3. Identify any planned or existing solar energy generating system(s) in Minnesota which that shares any of the following with the proposed project: power purchase agreement, interconnection, sales, revenues, debt or equity financing, or other ownership or financial interests. Describe any facilities identified, including their location, alternating current nameplate capacity, and their interconnection requests.

None.



System Summary
System Capacity: 50 MW
Interconnection Voltage: 115 kV
Leased Area: 489 Ac.

Equipment:
-(1) 36/48/60 MVA MPT
-(13) SUNGROW 4400 INVERTERS

Proposed Substation Location:
-47.544098, 95.129506

Current POI &
Combustion Turbine

