

September 11, 2024

VIA eFILING

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

Re: Reply Comments

**In the Matter of the Application of Gopher State Solar, LLC for a Site Permit for the
up to 200 MW Gopher State Solar Project in Renville County, MN
MPUC Docket No. IP7127/GS-24-106**

Dear Mr. Seuffert:

Gopher State Solar, LLC (Gopher State Solar), submits these reply comments regarding the completeness of its Application for a Site Permit (Application) for an up to 200 megawatt (MW) alternating current photovoltaic solar energy generating facility and associated facilities known as the Gopher State Solar Project in Renville County, Minnesota (Project).

Initial comments were filed by the International Union of Operating Engineers Local 49 (IUOE Local 49) and the North Central States Regional Council of Carpenters (NCSRC of Carpenters) on September 4, 2024. Gopher State Solar appreciates IUOE Local 49 and NCSRC of Carpenters' support of a finding of completeness for the Application. Gopher State Solar looks forward to further conversations with IUOE Local 49 and NCSRC of Carpenters on how to maximize benefits for local construction workers.

Initial comments were also filed by the Minnesota Department of Commerce, Energy Environmental Review and Analysis (DOC-EERA) on September 5, 2024. Gopher State Solar appreciates DOC-EERA Staff's thorough review of the Application and comments on this process going forward. Gopher State Solar provides these reply comments to address the items discussed in the comments of DOC-EERA Staff, as well as to discuss the process for further review of the Application.

Application Completeness.

The Minnesota Public Utilities Commission (Commission) requested comments concerning whether the Application contains the information required under the applicable rule. DOC-EERA Staff recommended the Commission accept the Application as substantially complete but require Gopher State Solar to continue coordination with the Minnesota Department of Natural Resources (DNR) to avoid impacts to native prairie and conservation easements.

Gopher State Solar agrees to continue coordinating with the DNR to avoid impacts to native prairie and conservation easements.

Advisory Task Force.

Gopher State Solar agrees with DOC-EERA Staff that an advisory task force is not warranted. Therefore, the Commission should decline to appoint an advisory task force.

Application Review Process.

Gopher State Solar agrees with DOC-EERA Staff's assessment that there are no contested issues of fact. Gopher State Solar also agrees with DOC-EERA Staff's recommendation that the matter should be referred to the Office of Administrative Hearings (OAH) for a public hearing and preparation of a full administrative law judge report with recommendations.

Conclusion.

Gopher State Solar respectfully requests that the Commission:

1. Accept the Application as substantially complete and authorize review of the Application under the alternative permitting process under Minn. Stat. § 216E.04 and Minn. R. 7850.2800 to 7850.3900;
2. Find there are no contested issues of fact with respect to the proposed Project;
3. Refer the matter to the OAH for a public hearing and preparation of a full administrative law judge report with recommendations; and
4. Find that an advisory task force is not warranted.

Please let me know if you have any questions regarding this filing.

Sincerely,

FREDRIKSON & BYRON, P.A.

A handwritten signature in black ink, appearing to read 'CKB', followed by a horizontal line.

Christina K. Brusven

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CERTIFICATE OF SERVICE

Maia Martinez certifies that on the 11th day of September, 2024, she e-filed a true and correct copy of the reply comments on behalf of Gopher State Solar, LLC via eDockets (www.edockets.state.mn.us):

Said documents were also served as designated on the Official Service Lists on file with the Minnesota Public Utilities Commission and as attached hereto.

Executed on: September 11, 2024

Signed: /s/ Maia Martinez

Fredrikson & Byron, P.A.
60 South Sixth Street
Suite 1500
Minneapolis, MN 55402

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	60 S 6th St Ste 1500 Minneapolis, MN 55402-4400	Electronic Service	No	OFF_SL_24-106_GS-24-106
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_24-106_GS-24-106
Ryan	Cox	rcox@fredlaw.com	Fredrikson & Byron, P.A.	60 S Sixth St Ste 1500 Minneapolis, MN 55402-4400	Electronic Service	No	OFF_SL_24-106_GS-24-106
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_24-106_GS-24-106
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_24-106_GS-24-106
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_24-106_GS-24-106