

June 10, 2026

**VIA E-FILING**

Sasha Bergman  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
Saint Paul, MN 55101

**Re: In the Matter of Lake Charlotte Solar, LLC's and Lake Charlotte Storage, LLC's Joint Application for the Lake Charlotte 150 MW Solar Facility and 150 MW/600-MWh Lake Charlotte Battery Energy Storage System Located in Rutland Township in Martin County, Minnesota**

**CAH Docket No. 23-2500-41194**

**MPUC Docket No. IP-7159/ESS-25-205 & IP-7159/GS-25-206**

Dear Ms. Bergman:

Lake Charlotte Solar, LLC (Lake Charlotte Solar) and Lake Charlotte Storage, LLC's (Lake Charlotte Storage) (collectively, the Applicants) respectfully submit these exceptions to the Findings of Fact, Conclusions of Law, and Recommendations (Report) filed by the Administrative Law Judge (ALJ) in the above-referenced matter. The Report recommends that the Minnesota Public Utilities Commission (Commission) grant site permits for the up to 150-megawatt solar project and associated facilities (Solar Facility) and for the up to 150 MW / 600-megawatt hour alternating current battery energy storage system and associated facilities (BESS Facility) (collectively, the Solar Facility and BESS Facility are the Project). The Report is thorough and comprehensively summarizes the record developed in this matter. Because of the Report's comprehensive analysis, and with the exception of the following exceptions described below, the Applicants support the ALJ's recommendation to grant the permits. In addition to the exceptions to the Report, the following also requests revisions to the Project description sections of the BESS and Solar Facility Draft Site Permits (DSP) to accurately reflect the Project as described in this record.

## **A. Perimeter Fencing**

The Report maintains that the proposed plan for Project fencing is inconsistent with applicable DSP conditions, and that Applicants otherwise must adhere to Department of Natural Resources (DNR) recommendations on fence design. Applicants respectfully request that the following findings be revised in the manner and for the reasons described below.

The Report's finding at paragraph 43 describes Applicants' proposed fence design for the Solar Facility, including that "[i]n place of barbed wire, one foot of three to four strands of smooth wire will be placed atop of the woven wire fence for a total height of approximately eight feet above

grade.”<sup>1</sup> The Report states further that the proposed design is “not consistent with DNR recommendations or Solar Facility DSP condition 4.3.32.”<sup>2</sup> DNR has requested that the fence be at least ten feet tall, rather than eight feet as proposed by Applicants.<sup>3</sup>

The fence design as proposed by Applicants is not inconsistent with Solar Facility DSP condition 4.3.32. That condition does not mandate a specific fence height or that DNR recommendations are followed; rather, it requires that Lake Charlotte Solar balance multiple, potentially competing, factors and develop the fence design *in coordination with* the DNR. Specifically, it requires that Lake Charlotte Solar “minimize the visual impact of the Project while maintaining compliance with the National Electric Safety Code [and] develop a final fence plan for the specific site in coordination with DNR.”<sup>4</sup> DNR has expressed support for condition 4.3.32 as written.<sup>5</sup> Lake Charlotte Solar, moreover, appreciates DNR’s concern regarding potential wildlife impacts resulting from Project fencing. Respectfully, however, condition 4.3.32 does not require Lake Charlotte Solar to strictly adhere to DNR’s guidance or recommendations on fence height, and instead only requires coordination with DNR on final design.<sup>6</sup> Lake Charlotte Solar met with DNR on April 15, 2026 to discuss fencing design and will continue to engage and coordinate with DNR on final fence design. Similarly, Applicants have endeavored to balance the need to comply with National Electric Safety Code (NESC) requirements while minimizing visual impacts. The proposed eight-foot height exceeds minimum NESC requirements while avoiding potential visual impacts resulting from a taller fence. Accordingly, Applicants request the Commission revise Report paragraph 43 as follows:

**43.** The Applicants proposed fencing around the Solar Facility consisting of an agricultural woven wire fence that will extend approximately seven feet above grade. Barbed wire will not be used around the perimeter of the Solar Facility. In place of barbed wire, one foot of three to four strands of smooth wire will be placed atop of the woven wire fence for a total height of approximately eight feet above grade. This proposal is not consistent with DNR recommendations ~~or DSP condition 4.3.32.~~

Similarly, the Report’s finding at Paragraph 69 adds, “[t]he DSP should require Applicants to consult with and follow DNR recommendations for the security/perimeter fence.”<sup>7</sup> As noted above, DSP condition 4.3.32 – which DNR supports – does not require Applicants to “follow DNR recommendations for the security/perimeter fence.” Instead, it only requires continued coordination with DNR. Again, Applicants have and will continue to coordinate with DNR on final fence design. Accordingly, Applicants request the Commission revise Report paragraph 69 as follows:

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<sup>1</sup> Findings of Fact, Conclusions of Law, and Recommendations (Report) at ¶ 43 (May 26, 2026) (eDockets No. [20265-232146-01](#)).

<sup>2</sup> Report at ¶ 43 (May 26, 2026) (eDockets No. [20265-232146-01](#)).

<sup>3</sup> PUC-13 at 1 (DNR Comments); DNR Comment at pp. 1-2 (Mar. 13, 2026) (eDockets No. [20263-229284-01](#)).

<sup>4</sup> PUC-EIP-5 (EA Appendix C) at 18.

<sup>5</sup> DNR Comment at 2 (Mar. 13, 2026) (eDockets No. [20263-229284-01](#)).

<sup>6</sup> PUC-EIP-5 (EA Appendix C) at 18.

<sup>7</sup> Report at ¶ 69 (May 26, 2026) (eDockets No. [20265-232146-01](#)).

69. DNR recommended the security fence reach a minimum height of ten feet around each group of solar arrays to prevent white-tailed deer and other large wildlife from entering the facility and be designed in accordance with the DNR's Fencing Handbook for 10ft Woven Wire Deer Exclusion Fence, and utilize a VMP throughout the permitted sites that is consistent with the DNR's Prairie Establishment and Maintenance Technical Guidance for Solar Standards. In addition to security measures to protect human life, the security fence should consider safety and access by wildlife. The **Solar DSP** ~~should require~~ Applicants **Lake Charlotte Solar** to consult with and follow DNR recommendations for the on security/perimeter fence **design**.

## **B. State Historic Preservation Office (SHPO) and Tribal Consultation**

The Report's finding at paragraph 181 – regarding Applicants' consultation with SHPO and Tetra Tech's Phase I archaeological survey of the Project Area – states “[t]he results of Tetra Tech's additional investigation were provided to SHPO on February 10, 2026. No response to the additional investigation from SHPO has been filed.”<sup>8</sup> Applicants however, received responsive communications from SHPO regarding the Phase I on March 3, 2026. SHPO concurred that the previously identified archaeological sites and findings are either not eligible for listing in the National or State Registers of Historic Places and/or will be avoided by the Project altogether. SHPO's March 3 letter is attached hereto as **Exhibit A**. On May 13, 2026, Applicants additionally provided the Phase I survey and SHPO's comments on the same to representatives from the Upper Sioux Community and the Shakopee Mdewakanton Sioux Community. The Tribal Historic Preservation Officer for the Shakopee Mdewakanton Sioux Community, Leonard Wabaha, responded on the same day that he has no concerns regarding the Project. Having received no response from the Upper Sioux Community, Applicants sent a follow up email on June 8, 2026. Correspondence with the Tribes are attached hereto as **Exhibit B**. Accordingly, Applicants request the Commission revise Report paragraph 181 as follows:

**181.** The results of Tetra Tech's additional investigation were provided to SHPO on February 10, 2026. **SHPO reviewed Tetra Tech's additional investigation report and responded it agreed that no impacts to archaeological and historic resources are anticipated for this Project.** ~~No response to the additional investigation from SHPO has been filed.~~

## **C. BESS Augmentation**

Paragraph 237 of the Report deleted a sentence describing mechanisms to augment the BESS Facility over time to preserve BESS Facility capacity and efficiency.<sup>9</sup> Augmentation was discussed in the Project's Joint Site Permit Application and the EA as an important and necessary part of ensuring the maintenance of the capacity of the BESS Facility during its operation.<sup>10</sup>

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<sup>8</sup> Report at ¶ 181 (May 26, 2026) (eDockets No. [20265-232146-01](#)).

<sup>9</sup> Report at ¶ 237 (May 26, 2026) (eDockets No. [20265-232146-01](#)).

<sup>10</sup> PUC-EIP-5 (EA) at 51 & LSC-2 at 40-41 (Joint Site Permits Application).

Accordingly, consistent with site permits approved for other battery energy storage projects<sup>11</sup>, Lake Charlotte Storage respectfully requests the addition of a new site permit condition to the BESS Facility DSP that will allow augmentation of the BESS Facility to maintain its capacity:

#### **5.4 Battery Augmentation**

The Permittee shall notify the Commission of scheduled augmentation at least 30 days prior to commencing augmentation activities. In its filing, the Permittee shall describe the number and types of batteries included in the augmentation. The Permittee shall indicate the location of the augmentation on the project Site Plan. In its filing the Permittee shall demonstrate compliance with the noise impact assessment submitted to the Commission as required in Section 5.1 of this permit.

With the addition of BESS Facility DSP 5.4, Lake Charlotte Storage, respectfully requests that the Commission revise Report paragraph 237 to reflect that augmentation is part of the site permit and was considered in the proceeding:

**237.** Lake Charlotte Storage recognizes that BESS components may lose efficiency over the Project’s life cycle. Lake Charlotte Storage will plan for and maintain the facility as needed to maintain efficient operations and in accordance with MISO requirements. **The BESS Draft Site Permit provides a mechanism to allow Lake Charlotte Storage to augment the BESS overtime to maintain facility efficiency and capacity.**

#### **D. DSP – Project Descriptions**

While the Report and EA fully and adequately assess Project impacts, the Project Description sections of both the BESS DSP and Solar DSP do not fully capture the full description of the Project and associated facilities as set forth in the record and Findings 38-51 of the Report.

Applicants respectfully request that the Project Description in the BESS DSP<sup>12</sup> be revised as follows:

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<sup>11</sup>*In the Matter of the Application of North Star Energy Storage, LLC for an Up to 100-megawatt Battery Energy Storage System Site Permit for the North Star Storage Project in Chisago County, Minnesota, IP-7155/ESS-25-123, Order at 10, 63, & 78 (Mar. 12, 2026); In the Matter of the Application of Crane Energy Storage LLC for a Site Permit for the up to 200MW Crane Energy Storage Project in Olmsted County, Minnesota, IP-7148/ESS-24-406, Order at 74 (May 8, 2026); In the Matter of the Application of Sandhill Energy Storage LLC for a Site Permit for the up to 200MW Sandhill Energy Storage Project in Olmsted County, Minnesota, IP-7149/ESS-24-407 Order at 112 (May 8, 2026); and In the Matter of the Application of Snowshoe BESS, LLC for a Site Permit for the up to 150 MW Snowshoe Energy Storage Project in Olmsted County, IP-7138/ESS-24-279, Order at 15 & 28 (Sept. 22, 2025).*

<sup>12</sup> PUC-EIP-5 (EA Appendix C) at 35.

## 2. PROJECT DESCRIPTION

Lake Charlotte Storage proposes to construct and operate the Lake Charlotte Storage Battery Energy Storage System with a 150 megawatt / 600 Megawatt Hour nameplate capacity and ancillary support infrastructure in Martin County, Minnesota. **In addition to batteries, racking, and enclosures, the facility will also include an access road, inverters and transformers, electrical collection and feeder lines, a project substation, a gen-tie line, an operations and maintenance building and fencing surrounding the perimeter of the facility.**

Applicants also respectfully request that the Project Description in the Solar DSP<sup>13</sup> be revised as follows:

## 2. PROJECT DESCRIPTION

A 150 megawatt solar energy conversion facility to be located in Rutland Township in Martin County, Minnesota. The project will occupy approximately 1,277 acres of land, 1,004 acres of which will be developed for the project. The project will use photovoltaic solar panels mounted on a linear axis tracking system. **The Facility will consist of the photovoltaic (PV) panels, trackers, inverters, transformers, access roads, security fencing, stormwater retention ponds, a project substation, a gen-tie line, and an operations and maintenance building.**

### E. PUC-EIP Exceptions

On June 4, 2026, Public Utilities Commission Energy Infrastructure Permitting (PUC-EIP) staff submitted a single exception to the Report.<sup>14</sup> PUC-EIP staff recommends that Site Permit Special Condition 5.9 on surface waters be revised to remove references to the “Blue Earth Watershed as this is not currently a legally recognized entity[,]” and further to eliminate the requirement that Applicants coordinate with DNR because DNR has already commented that “concerns over potential impacts are largely addressed by existing permit conditions such as those requiring project VMP and wildlife friendly erosion control.”<sup>15</sup> Accordingly, PUC-EIP staff requested that Condition 5.9 be revised as follows:

### 5.9 Surface Waters

The Permittee shall consult with ~~the MNDNR, and the Martin County Soil and Water Conservation District, and the Blue Earth Watershed~~ regarding potential impacts to nearby surface waters due to construction activities, including but not limited to, erosion and sediment control.<sup>16</sup>

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<sup>13</sup> PUC-EIP-5 (EA Appendix C) at 35.

<sup>14</sup> PUC-EIP Exceptions (Jun. 4, 2026) (eDockets No. [20266-232535-01](#)).

<sup>15</sup> PUC-EIP Exceptions at p. 1 (Jun. 4, 2026) (eDockets No. [20266-232535-01](#)).

<sup>16</sup> PUC-EIP Exceptions at pp.1-2 (Jun. 4, 2026) (eDockets No. [20266-232535-01](#)).

Applicants support these modifications, which are supported by the record.

Applicants appreciate the ALJ's thorough analysis of the record, as well as the Commission's consideration of the foregoing exceptions. These exceptions have been e-filed through [www.edocket.state.mn.us](http://www.edocket.state.mn.us). A copy of this filing is also being served upon the persons on the Official Service Lists of record.

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

Sincerely,

FREDRIKSON & BYRON, P.A.

*/s/ Jeremy P. Duehr*

Jeremy P. Duehr

**Direct Dial:** 612.492.7413

**Email:** [jduehr@fredlaw.com](mailto:jduehr@fredlaw.com)

March 3, 2026

Adam Holven  
Principal Investigator for Archaeology  
Tetra Tech, Inc.  
[adam.holven@tetratech.com](mailto:adam.holven@tetratech.com)

RE: Lake Charlotte Solar and Battery Storage Project – Additional Archaeological Survey  
Rutland Twp, Martin County  
SHPO Number: 2025-0667

Dear Adam Holven:

Thank you for continuing to coordinate with our office on the above referenced project that will require a permit from the Minnesota Public Utilities Commission (PUC). The PUC permit application is required to address “archaeological and historic resources,” which have been defined in PUC guidance.

We have reviewed your cover letter, dated February 10, 2026, and the archaeological report submitted in the Minnesota Office of the State Archaeologist cited below.

- *Addendum No. 1: Phase I Archaeological Investigation Lake Charlotte Solar and Battery Storage Project Martin County, Minnesota* prepared by Tetra Tech, Inc. in February 2026

Based on the above information, we understand that none of the archaeological sites within the project boundary that will be affected by the project are eligible for listing in the National Register of Historic Places. We previously agreed that archaeological site **21MR0111** should be evaluated or, if that is not possible, avoided by the proposed project. Based on your letter, we understand the site will be avoided. Archaeological sites **21MR0112**, **21MR0115**, and **21MR0118** **will not be affected** by the proposed project and, therefore, have not been evaluated. Thank you for providing detailed information regarding archaeological site **21MR0114** and its proximity to the lake and other sites, we agree that this site is not eligible. Thank you for conducting additional shovel testing as documented in the archaeological report. Based on the additional investigations, we agree that archaeological sites **21MR0113**, **21MR0116**, **21MR0117**, **21MR0137**, **21MR0138**, and **21MR0139** are **not eligible**.

Based on the documentation provided, we agree that there are no properties listed in the National or State Registers of Historic Places, or within the Historic Sites Network, located within the proposed project area.

Please note that this comment letter does not address the requirements of Section 106 of the National Historic Preservation Act of 1966 and 36 CFR § 800. If this project is considered for federal financial assistance, or requires a federal permit or license, then review and consultation with our office will need to be initiated by the lead federal agency in order to define an appropriate area of potential effects for the federal undertaking as well as the necessary historic property identification and evaluation efforts required for a federal review. Be advised that comments and recommendations provided by our office

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MINNESOTA STATE HISTORIC PRESERVATION OFFICE

50 Sherburne Avenue ■ Administration Building 203 ■ Saint Paul, Minnesota 55155 ■ 651-201-3287

[mn.gov/admin/shpo](http://mn.gov/admin/shpo) ■ [mnsppo@state.mn.us](mailto:mnsppo@state.mn.us)

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for this state-level review may differ from findings and determinations made by the federal agency as part of review and consultation under Section 106.

If you have any questions regarding our review of this project, please contact Lucy Harrington, Environmental Review Archaeologist, at (651)201-3283 or [lucy.harrington@state.mn.us](mailto:lucy.harrington@state.mn.us).

Sincerely,



Amy Spong  
Deputy State Historic Preservation Officer

CC: Marta Lasch, Geronimo Power  
Kim Gorman, Tetra Tech, Inc.

**Marta Lasch**

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**From:** Leonard Wabasha (TO) <leonard.wabasha@shakoopedakota.org>  
**Sent:** Wednesday, May 13, 2026 12:46 PM  
**To:** Marta Lasch  
**Cc:** monika.davis  
**Subject:** [External] RE: Lake Charlotte Solar and Storage - Martin County MN

**CAUTION: This email originated from outside the organization. Be cautious of using any link or opening any attachment unless you recognize the sender. If in doubt, report the email using the "Report Phishing" Add-in in Outlook.**

Thank you for the update, as long as no significant cultural resources were not discovered or in danger of disturbance I have no concerns, Thank you again and Have a Great Day!



**LEONARD WABASHA**

Tribal Historic Preservation Officer • Hocokata Ti  
Shakopee Mdewakanton Sioux Community  
d: 952.496.6120  
shakoopedakota.org  
Leonard.Wabasha@shakoopedakota.org

The Shakopee Mdewakanton Sioux Community is a federally recognized, sovereign Indian tribe located southwest of Minneapolis/St. Paul. With a focus on being a good neighbor, good steward of the earth, and good employer, the SMSC is committed to charitable donations, community partnerships, a healthy environment, and a strong economy.

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**From:** Marta Lasch <mlasch@geronimopower.com>  
**Sent:** Wednesday, May 13, 2026 11:50 AM  
**To:** Leonard Wabasha (TO) <leonard.wabasha@shakoopedakota.org>  
**Cc:** monika.davis <monika.davis@merjent.com>  
**Subject:** Lake Charlotte Solar and Storage - Martin County MN

This message came from **outside the organization**. Do Not click on links, open attachments or respond unless you know the content is safe.

Hello Mr. Wabasha,

I am following up with you regarding your previous response to pre-application notifications for the Lake Charlotte Solar and Storage Project in Martin County, MN. In your September 11, 2024, response, you indicated the SMSC will leave direct consultation to the Lower Sioux Community THPO since they are much closer to the proposed project. However, the Lower Sioux Community did not respond to our pre-application letter. The Upper Sioux Community did respond, and we are providing this same information to their THPO. Regardless, we are providing you with an update on the cultural resource surveys completed after we sent you the pre-application notification. Since submittal of the site permit application to the PUC and the completion of an initial Phase I Archaeological Investigation in June 2025, the Project has coordinated with MN SHPO. MN SHPO reviewed the initial Phase I site investigation and requested additional investigations of the areas between the documented sites along Lake Charlotte. Attached is an updated cultural resource survey report also reviewed by SHPO that details the additional survey efforts. After reviewing the cultural resources reports the SHPO concurred that documented sites are either not eligible for listing in the National Register of Historic Places and/or will be avoided by the Project.

**Exhibit B**


I've attached the initial archaeological report which includes an inadvertent or unanticipated discovery plan, the report addendum and SHPO's concurrence. See attached zip folder.

Let me know if you have questions about these results.

Thank you,  
Marta



**Marta Lasch**  
Permitting Lead

 952.988.9000

 612.259.3093



 [mlasch@geronimopower.com](mailto:mlasch@geronimopower.com)

8400 Normandale Lake Boulevard, Suite 1200 | Bloomington, MN 55437

~~~~~  
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~~~~~

**Marta Lasch**

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**From:** Marta Lasch  
**Sent:** Monday, June 8, 2026 10:09 AM  
**To:** 'Upper Sioux THPO'; camérons@uppersiouxcommunity-nsn.gov  
**Cc:** 'Monika Davis'  
**Subject:** RE: [External] RE: Lake Charlotte Solar and Storage - Martin County

Hello Cameron,

Can you confirm you received the previously provided documents and if there is any feedback?

Thank you,  
Marta

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**From:** Marta Lasch  
**Sent:** Thursday, May 14, 2026 4:11 PM  
**To:** 'Upper Sioux THPO' <thpo@uppersiouxcommunity-nsn.gov>  
**Cc:** Monika Davis <monika.davis@merjent.com>  
**Subject:** RE: [External] RE: Lake Charlotte Solar and Storage - Martin County

Hi Cameron,

I've sent you an email through microsoft and included the link that should work for your personal email address. Let me know if there are any remaining issues with access and I'll sort out a solution.

Thank you,  
Marta

 [Lake Charlotte Cultural Resources](#)

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**From:** Upper Sioux THPO <thpo@uppersiouxcommunity-nsn.gov>  
**Sent:** Thursday, May 14, 2026 3:18 PM  
**To:** Marta Lasch <mlasch@geronimopower.com>  
**Subject:** [External] RE: Lake Charlotte Solar and Storage - Martin County

**CAUTION: This email originated from outside the organization. Be cautious of using any link or opening any attachment unless you recognize the sender. If in doubt, report the email using the "Report Phishing" Add-in in Outlook.**

Hello,

Samantha is out of office until late June. I was attempting to access the link you had provided, but I was unable to get logged in using the [thpo@uppersiouxcommunity-nsn.gov](mailto:thpo@uppersiouxcommunity-nsn.gov) email address. Would you be able to provide this secure link to my work email address? My email is: [camérons@uppersiouxcommunity-nsn.gov](mailto:camérons@uppersiouxcommunity-nsn.gov)

Thank you,

**Cameron Stennes**

Tribal Cultural Specialist | Upper Sioux Community | Phone: 320-841-0000

**From:** Marta Lasch <[mlasch@geronimopower.com](mailto:mlasch@geronimopower.com)>  
**Sent:** Wednesday, May 13, 2026 4:05 PM  
**To:** Upper Sioux THPO <[thpo@uppersiouxcommunity-nsn.gov](mailto:thpo@uppersiouxcommunity-nsn.gov)>  
**Cc:** monika.davis <[monika.davis@merjent.com](mailto:monika.davis@merjent.com)>  
**Subject:** Lake Charlotte Solar and Storage - Martin County

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You don't often get email from [mlasch@geronimopower.com](mailto:mlasch@geronimopower.com). [Learn why this is important](#)

Hello Samantha Odegard,

I am following up with you regarding your previous response to pre-application notifications for the Lake Charlotte Solar and Storage Project in Martin County, MN. In your October 8, 2024, response, you indicated you had concerns regarding project activities toward documented and potential undocumented deposits, and you requested notification of rediscovered cultural resources and human remains. We are providing you with an update on the cultural resource surveys completed after we sent you the pre-application notification. Since submittal of the site permit application to the PUC and the completion of an initial Phase I Archaeological Investigation in June 2025, the Project has coordinated with MN SHPO. MN SHPO reviewed the initial Phase I site investigation and requested additional investigations of the areas between the documented sites along Lake Charlotte. Included in the link below is an updated cultural resource survey report also reviewed by SHPO that details the additional survey efforts. After reviewing the cultural resources reports the SHPO concurred that documented sites are either not eligible for listing in the National Register of Historic Places and/or will be avoided by the Project.

I've compiled our previous correspondence, the initial archaeological report which includes an inadvertent or unanticipated discovery plan, the report addendum and SHPO's concurrence. Found here: [Lake Charlotte Cultural Resources](#)

Let me know if you have questions about these results.

Thank you,  
Marta



952.988.9000



**Marta Lasch**  
Permitting Lead

612.259.3093

[mlasch@geronimopower.com](mailto:mlasch@geronimopower.com)

8400 Normandale Lake Boulevard, Suite 1200 | Bloomington, MN 55437

**In the Matter of Lake Charlotte Solar, LLC's and  
Lake Charlotte Storage, LLC's Joint Application  
for the Lake Charlotte 150 MW Solar Facility  
and 150 MW/600- MWh Lake Charlotte Battery  
Energy Storage System Located in Rutland  
Township in Martin County, Minnesota**

**Docket Nos. IP-7159/GS-25-206 and  
IP-7159/ESS-25-205  
CAH Docket Number: 23-2500-41194**

**CERTIFICATE OF SERVICE**

Breann L. Jurek certifies that on the 10<sup>th</sup> day of June, 2026, she e-filed a true and correct copy of the final Exceptions to Findings of Fact, Conclusions of Law, and Recommendations, with Exhibits A and B, on behalf of Applicants via eDockets ([www.edockets.state.mn.us](http://www.edockets.state.mn.us)).

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

Executed on: June 10, 2026

*Signed: /s/ Breann L. Jurek*  
\_\_\_\_\_  
Fredrikson & Byron, P.A.  
60 South Sixth Street  
Suite 1500  
Minneapolis, MN 55402

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	25-205 Official CC Service List
2	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	25-205 Official CC Service List
3	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	25-205 Official CC Service List
4	Martin	Donovan	martin.donovan@state.mn.us		Department of Natural Resources	500 Lafayette Road St Paul MN, 55155 United States	Electronic Service		No	25-205 Official CC Service List
5	Jeremy	Duehr	jduehr@fredlaw.com	Fredrikson & Byron, P.A.		60 S Sixth St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	25-205 Official CC Service List
6	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	25-205 Official CC Service List
7	Emily	Johnson	emily.johnson1@state.mn.us		Public Utilities Commission		Electronic Service		No	25-205 Official CC Service List
8	Breann	Jurek	bjurek@fredlaw.com	Fredrikson & Byron PA		60 S Sixth St Ste 1500 Minneapolis MN, 55402 United States	Electronic Service		No	25-205 Official CC Service List
9	Marta	Lasch	mlasch@geronimopower.com	Lake Charlotte Solar, LLC		8400 Normandale Lake Blvd Ste 1200 Bloomington MN, 55437 United States	Electronic Service		No	25-205 Official CC Service List
10	Molly	Leisen	mleisen@fredlaw.com	Fredrikson & Byron P.A.		60 South Sixth Street Suite 1500 Minneapolis MN, 55402 United States	Electronic Service		No	25-205 Official CC Service List
11	Cezar	Panait	cezar.panait@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	25-205 Official CC Service List
12	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	25-205 Official CC Service List
13	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix & Associates		7400 Lyndale Avenue South Suite 190 Richfield MN, 55423 United States	Electronic Service		Yes	25-205 Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
14	Suzanne	Todnem	suzanne.todnem@state.mn.us		Office of Administrative Hearings	600 Robert Street North PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		Yes	25-205 Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	25-206 Official CC Service List
2	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	25-206 Official CC Service List
3	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	25-206 Official CC Service List
4	Martin	Donovan	martin.donovan@state.mn.us		Department of Natural Resources	500 Lafayette Road St Paul MN, 55155 United States	Electronic Service		No	25-206 Official CC Service List
5	Jeremy	Duehr	jduehr@fredlaw.com	Fredrikson & Byron, P.A.		60 S Sixth St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	25-206 Official CC Service List
6	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	25-206 Official CC Service List
7	Emily	Johnson	emily.johnson1@state.mn.us		Public Utilities Commission		Electronic Service		No	25-206 Official CC Service List
8	Breann	Jurek	bjurek@fredlaw.com	Fredrikson & Byron PA		60 S Sixth St Ste 1500 Minneapolis MN, 55402 United States	Electronic Service		No	25-206 Official CC Service List
9	Marta	Lasch	mlasch@geronimopower.com	Lake Charlotte Solar, LLC		8400 Normandale Lake Blvd Ste 1200 Bloomington MN, 55437 United States	Electronic Service		No	25-206 Official CC Service List
10	Molly	Leisen	mleisen@fredlaw.com	Fredrikson & Byron P.A.		60 South Sixth Street Suite 1500 Minneapolis MN, 55402 United States	Electronic Service		No	25-206 Official CC Service List
11	Cezar	Panait	cezar.panait@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	25-206 Official CC Service List
12	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	25-206 Official CC Service List
13	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix & Associates		7400 Lyndale Avenue South Suite 190 Richfield MN, 55423 United States	Electronic Service		Yes	25-206 Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
14	Suzanne	Todnem	suzanne.todnem@state.mn.us		Office of Administrative Hearings	600 Robert Street North PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		Yes	25-206 Official CC Service List