

Appendix A

Scoping Decision



In the Matter of Lake Charlotte Solar, LLC’s Joint Application for the Lake Charlotte 150 MW Solar Facility and 150 MW Lake Charlotte Battery Energy Storage System (BESS) located in Rutland Township, Martin County, Minnesota

**ENVIRONMENTAL ASSESSMENT
SCOPING DECISION**

**DOCKET NOS. IP-7159/GS-25-206 and
IP-7159/ESS-25-205**

The above matter has come before the Executive Secretary of the Minnesota Public Utilities Commission (Commission) for a decision on the scope of the environmental assessment (EA) to be prepared for Lake Charlotte Solar, LLC’s (Lake Charlotte Solar) proposed 150 megawatt (MW) solar energy and storage project in Rutland Township in Martin County, Minnesota. The Commission is reviewing this application under [Minnesota Statute 216E \(2023\)](#).

Project Description

On June 3, 2025, Lake Charlotte Solar submitted a site permit application to the Commission to construct the Lake Charlotte Solar Project – an up to 150 MW alternating current photovoltaic solar energy generating facility and 150 MW battery energy storage system (BESS).¹

The project will occupy approximately 1,277 acres in Rutland Township, Minnesota, of which approximately 1,004 acres will be used for the operation of the project.

The project will use photovoltaic solar panels mounted on single axis tracking systems. Collection cables, either installed below-ground, or in a hybrid arrangement with above-ground and below-ground collection, will gather and send the electric power generated by the solar panels to a project substation. The project substation will be a 34.5/161 kV substation with metering and switching gear required to connect the solar facility and BESS to the existing Southern Minnesota Municipal power Agency (SMMPA) Rutland Substation via a shared 161 kV overhead gen-tie transmission line of approximately 365 feet, pending final engineering design.²

Lake Charlotte Solar has an executed Generator Interconnection Agreement (GIA) with SMMPA and the Midcontinent Independent System Operator, Inc (MISO), enabling the project to interconnect at the SMMPA Rutland Substation, accommodating up to 150 MW AC from the solar facility. Lake Charlotte Solar is pursuing an additional GIA through MISO’s surplus interconnection service for the BESS to operate independently and receive and store energy directly from the electric grid. The project substation will provide the BESS with an independent connection to the electrical grid, allowing the BESS to potentially accommodate up to 150 MW of surplus energy from the electrical grid and inject it back into the electrical grid during times of increased demand.³

¹ Lake Charlotte Solar Project, Application to the Minnesota Public Utilities Commission for a Site Permit for a Large Electric Generating Facility, June 6, 2025, eDockets Numbers [20256-219557-01](#) (through -12).

² Site Permit Application, Section 4.1.7.

³ Site Permit Application, Section 2.4.

Project Purpose

Lake Charlotte Solar states that the project will help meet Minnesota’s carbon-free energy standards and contribute to the state’s renewable energy objectives as well as other clean energy requirements in Minnesota, neighboring states, and the country at large. The project will also serve consumers’ growing demand for renewable energy and will benefit the local community through investment from constructing and operating the project, property and business taxes, and landowner lease payments.

Additionally, the BESS is designed to operate independently from the solar facility, providing up to 150 MW of energy storage capacity, storing energy that may have otherwise been curtailed.⁴ Lake Charlotte Solar indicates that the power generated or stored by the project will be offered to wholesale customers, including Minnesota utilities and cooperatives that have identified a need for additional low-cost renewable energy and capacity, and corporate and industrial customers that have set clean energy goals.⁵

Regulatory Background

In Minnesota, no person may construct a large electric power generating plant without a site permit from the Commission.⁶ A large electric power generating plant is defined as a facility capable of operating at a capacity of 50 MW or more.⁷ The Lake Charlotte Solar project will be capable of producing up to 150 MW and therefore requires a site permit from the Commission.

Additionally, no person may construct an energy storage system in Minnesota without a site permit from the Commission.⁸ An energy storage system is a facility with a storage capacity of 10 MW or more.⁹ The Lake Charlotte Solar BESS will be capable of storing up to 150 MW and therefore requires a site permit from the Commission. Because Lake Charlotte Solar’s application is for a solar energy generating system and BESS, the application qualifies for Commission review under the alternative permitting process described in Minnesota Statute 216E.04, Subd. 2.¹⁰

As Lake Charlotte Solar is an independent power producer, and the project is a solar facility and associated BESS, a certificate of need (CN) is not required for the project.¹¹

Commission Energy Infrastructure Permitting (EIP) staff will prepare an EA for the project. An EA contains an overview of the resources affected by the project. It also discusses potential human and environmental impacts and possible mitigation measures.¹² Under the alternative permitting process, an EA is the only required state environmental review document.

⁴ Site Permit Application, Section 1.1.

⁵ Site Permit Application, Section 1.3.

⁶ Minnesota Statute 216E.03, Edition Year 2023.

⁷ Minnesota Statute 216E.01, Edition Year 2023.

⁸ Minnesota Statute 216E.01, Subd. 5, Edition Year 2023.

⁹ Minnesota Statute 216E.04, Subd. 2, Edition Year 2023.

¹⁰ The Agriculture and Energy Omnibus Bill passed in Minnesota’s 2024 legislative session reformed state energy permitting policy. Effective July 1, 2025, environmental review and permitting of solar farms by the Commission will be conducted in accordance with Minnesota Statute 216I. Site permit applications for solar farms submitted prior to July 1, 2025, will be reviewed in accordance with Minnesota Statute 216E. Lake Charlotte Solar submitted a site permit application before July 1, 2025; as such, the permitting process will continue pursuant to Minnesota Statute 216E.

¹¹ Minnesota Statute 216B.243, Subds. 8(a)(8) and 8(a)(9), Edition Year 2023.

¹² Minnesota Statute 216E.04, subd. 5, Edition Year 2023; Minn. Rule 7850.3700, subp. 4, Published 2024.

Scoping Process

Scoping is the first step in the environmental review process. The scoping process has two primary purposes: (1) to gather public input as to the impacts and mitigation measures to study in the EA and (2) to focus the EA on those impacts and mitigation measures that will aid in the Commission's decision on the site permit application.

Staff use the information gathered during scoping to inform the content of the EA. EIP staff gathered input on the scope of the EA through public meetings and an associated comment period. This scoping decision identifies the impacts and mitigation measures that will be analyzed in the EA.

Public Information and Scoping Meetings

On August 28, 2025, staff held an in-person public meeting in Fairmont, Minnesota. Over 70 members of the public attended this meeting, and 13 attendees provided comments. On September 2, 2025, staff held an on-line public meeting. Approximately 16 people attended this meeting, and eight attendees provided comments. Several potential human and environmental impacts and concerns related to the project were raised. Potential human impacts and concerns included the use of local labor; aesthetics; buffers and setbacks; drain tile; glare and public health impacts; property values; tax revenue; prime farmland; decommissioning; and disposal of solar panels. Potential environmental impacts and concerns included water, soil, and air quality; runoff and drainage; wildlife; snow drift; extreme weather; greenhouse gases; microclimates; and land classification.¹³

Written Public Comments

A comment period ending on September 17, 2025, provided the public with an opportunity to provide input on the scope of the EA. Written comments were received from nine members of the public, Martin County, and two state agencies.¹⁴

Martin County's comments included a request to abide by county setbacks for the locations of the solar panels, particularly with respect to residences and protected waters.¹⁵

Members of the public addressed several potential impacts and concerns related to the project including: conservation of prime farmland, the project's proximity to the city of Northrop, aesthetic impacts, impacts to the environment and wildlife, impacts to the local farming economy, and the potential for environmental contamination resulting from panel-damaging scenarios, such as hailstorms or fires.¹⁶

Agency Comments

Minnesota Department of Natural Resources (DNR)

The Minnesota Department of Natural Resources (DNR) provided comments on the potential impacts of the proposed fencing design, encouraging the applicant to create a final security fence plan that is

¹³ Lake Charlotte Solar Project, Oral Comments on the Scope of Environmental Assessment, eDockets Number [20259-223226-02](#).

¹⁴ Lake Charlotte Solar Project, Written Comments on the Scope of Environmental Assessment, eDockets Number [20259-223226-01](#).

¹⁵ Id., p. 2.

¹⁶ Id., p. 3-8.

designed in accordance with the agency's [Fencing Handbook for 10ft Woven Wire Deer Exclusion Fence](#).¹⁷

The DNR recommended that the EA discuss the vegetation reestablishment phases of the project vegetation management plan (VMP), soil stability, habitat support, project lighting design, dust control methods, and wildlife friendly erosion control. The DNR encouraged the applicant to use native trees and shrubs in the project's VMP.

The Minnesota Legislature has delegated the responsibility of administering a cost-sharing program for the development and maintenance of snowmobile trails to the DNR. The DNR notes that the proposed project may interact with segment #161 of the Prairie Trail snowmobile trail; however, impacts to snowmobiles can be avoided by limiting or refraining from construction activities from December 1 through April 1. If trail closures or reroutes are necessary, the permittee will need to coordinate with local snowmobile clubs.¹⁸

Minnesota Department of Transportation (MnDOT)

The Minnesota Department of Transportation (MnDOT) provided comments on the project's proximity to and potential impacts on trunk highway (TH) 15. There are several water basins near the TH 15 right of way (ROW), and the applicant is advised to ensure that any water basins located will not negatively impact existing land and infrastructure surrounding the project area, specifically related to peak runoff rates. A MnDOT District Hydraulics Engineer may need to review the project to determine if a drainage permit is needed MnDOT Drainage Permit Application. A drainage permit is required for all types of drainage changes on TH ROW.¹⁹

In early coordination with MnDOT, an "ex. Archaeological location" was mapped at the corner of TH 15 and 170th Street. MnDOT has confirmed that this preliminary mapping overlaps into MNDOT ROW, and if any project work is planned in this area that affects MnDOT ROW, a permit will be required and need to be reviewed by the Office of Environmental Stewardship Cultural Resources Unit. The project boundary is also located along a high vulnerability snow trap, which may create impacts due to the change in adjacent land use, in addition to the potential for the project to aid in the severity of the snow trap. MnDOT encourages the applicant to clarify whether the proposed project will adversely impact these resources and is recommended to work with MnDOT's Blowing Snow Control team to discuss and resolve potential impacts to the area.²⁰

HAVING REVIEWED THE MATTER, consulted with EIP staff, and in accordance with Minnesota Rule 7850.3700, I hereby make the following scoping decision:

MATTERS TO BE ADDRESSED

The EA will describe the project and the human and environmental resources of the project area. It will provide information on the potential impacts of the project as they relate to the topics outlined in this

¹⁷ MNDNR comments, September 16, 2025, eDockets Number [20259-223095-01](#) and [20259-223095-02](#).

¹⁸ Id.

¹⁹ MNDOT Comments, September 16, 2025. eDockets no. [20259-223056-01](#)

²⁰ Id.

scoping decision and possible mitigation measures. It will identify impacts that cannot be avoided and irretrievable commitments of resources, as well as permits from other government entities that may be required for the project. The EA will discuss the relative merits of the proposed project site with respect to the siting factors in Minnesota Rule 7850.4100.

The issues outlined below will be analyzed in the EA for the project. This outline is not intended to serve as a table of contents for the document itself.

I. GENERAL DESCRIPTION OF THE PROJECT

- A. Project Description
- B. Project Purpose
- C. Project Costs

II. REGULATORY FRAMEWORK

- A. Site Permits
- B. Environmental Review
- C. Grid Interconnection
- D. Other Permits and Approvals

III. ENGINEERING, DESIGN, AND CONSTRUCTION

- A. Solar Arrays
- B. Electrical Collection Systems
- C. Battery Energy Storage System
- D. Substation
- E. Associated Facilities

IV. OPERATION AND DECOMMISSIONING

- A. Maintenance
- B. Vegetation Management
- C. Repowering and Decommissioning (panel disposal)

V. AFFECTED ENVIRONMENT, POTENTIAL IMPACTS AND MITIGATIVE MEASURES

The EA will include a discussion of the human and environmental resources potentially impacted by the project. Potential impacts of the project will be described and characterized. Based on the impacts identified, the EA will describe mitigation measures that could reasonably be implemented to reduce or eliminate the identified impacts. The EA will describe any unavoidable impacts resulting from implementation of the project.

Data and analyses will be commensurate with the level of impact for a given resource and the relevance of the information to consider mitigation measures. EIP staff will consider the relationship between the cost of data and analyses and the relevance and importance of the information in determining the level of detail of information to be prepared for the EA. Less important material may be summarized, consolidated, or simply referenced.

If relevant information cannot be obtained within timelines prescribed by statute and rule, the costs of obtaining such information is excessive, or the means to obtain it is unknown, EIP staff

will include in the EA a statement that such information is incomplete or unavailable and the relevance of the information in evaluating potential impacts or alternatives.

- A. Environmental Setting
- B. Human Settlements
 - 1. Noise
 - 2. Aesthetics (vegetative screening)
 - 3. Displacement
 - 4. Property Values
 - 5. Zoning and Land Use Compatibility (land use, tax revenue)
 - 6. Cultural Values
 - 7. Transportation and Public Services (road use, highway impacts, snow drift)
- C. Socioeconomics
 - 1. Environmental Justice
 - 2. Local Economies (employment, local business, financial assurances)
- D. Public Health and Safety
 - 1. Electric and Magnetic Fields
 - 2. Emergency Services
- E. Land Based Economies
 - 1. Agriculture (prime farmland)
 - 2. Forestry
 - 3. Mining
 - 4. Recreation and Tourism (snowmobile trail)
- F. Archaeological and Historic Resources
- G. Natural Environment
 - 1. Water Resources (wetlands, Lake Charlotte, groundwater)
 - 2. Soils
 - 3. Geology
 - 4. Flora (native trees and shrubs)
 - 5. Fauna (lighting, dust control, erosion control)
 - 6. Air Quality
 - 7. Climate Change / Climate Resiliency (Greenhouse Gases)
- H. Threatened / Endangered / Rare and Unique Natural Resources
- I. Cumulative Potential Effects
- J. Adverse Impacts that Cannot be Avoided
- K. Irreversible and Irretrievable Commitments of Resources

ISSUES OUTSIDE THE SCOPE OF THE EA

The EA will not address following topics:

- Any site other than the project site proposed by the applicant.
- The manner in which landowners are compensated for the project.

SCHEDULE

The EA is anticipated to be completed and available in February 2026. Upon completion, it will be noticed and made available for review. Public hearings will be noticed and held in the project area after issuance of the EA. Comments on the EA may be submitted into the hearing record.

Signed this 25th day of October, 2025

STATE OF MINNESOTA
MINNESOTA PUBLIC UTILITIES COMMISSION



Sasha Bergman, Executive Secretary

Lake Charlotte Project Overview Map

