

August 30, 2024

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

RE: EERA Supplemental Comments and Recommendations on Application Completeness  
Birch Coulee Solar Project  
Docket No. IP-7119/GS-23-477

Dear Mr. Seuffert,

Department of Commerce, Energy Environmental Review and Analysis (EERA) staff provides these supplemental comments and recommendations in the following matter:

In the Matter of the Application of Birch Coulee Solar LLC for a Site Permit for the up to 125 MW Birch Coulee Solar Project in Renville County, Minnesota

On July 29, 2024, Birch Coulee Solar, LLC (Birch Coulee Solar) filed a site permit application to construct and operate the Birch Coulee Solar project, an up to 125 megawatt (MW) solar farm in Renville County, Minnesota. On August 6, 2024, the Minnesota Public Utilities Commission (Commission) issued a notice soliciting comments on the completeness of the application and related procedural matters.

On August 19, 2024, EERA staff filed comments on application completeness; EERA staff recommended that the Commission accept Birch Coulee Solar's site permit application as substantially complete but requested Birch Coulee Solar provide estimated greenhouse gas (GHG) emissions associated with the construction of the project.<sup>1</sup> On August 23, 2024, Birch Coulee Solar filed reply comments addressing EERA staff's request to provide estimates of construction-phase GHG emissions for the project.<sup>2</sup>

EERA staff has reviewed Birch Coulee Solar's reply comments. Staff finds that the reply comments provide the estimated construction-phase GHG emissions required for a site permit application. Birch Coulee Solar's reply comments provide: 1) a summary of estimated mobile GHG emissions during construction, 2) detailed estimated off-road GHG emissions during construction broken down by equipment type, and 3) detailed estimated on-road GHG emissions during construction broken down by vehicle type.

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<sup>1</sup> EERA, Comments on Application Completeness, August 19, 2024, eDockets Number [20248-209618-01](#).

<sup>2</sup> Birch Coulee Solar Project, Completeness Reply Comments, August 23, 2024, eDockets Number [20248209742-01](#).

EERA staff finds that Birch Coulee Solar's reply comments adequately address EERA's request for construction-phase GHG emissions. Staff recommends that the Commission find Birch Coulee Solar's site permit application to be complete.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lauren Agnew', with a stylized, cursive script.

Lauren Agnew  
Environmental Review Manager