

Before the Minnesota Public Utilities Commission

State of Minnesota

In the Matter of the Joint Application of Minnesota Power for a Site and Route Permit for the  
85 Megawatt Boswell Solar Project and Associated 2.45-mile 230 Kilovolt Transmission Line  
in Itasca County, Minnesota

CAH Docket No. 24-2500-40659  
MPUC Docket Nos. E015/GS-24-425 and E015/TL-24-426

**Project Overview and the Environmental Assessment**

September 3, 2025

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1                                   **I.       INTRODUCTION AND QUALIFICATIONS**

2   **Q.     Please state your name and business address.**

3   A.     My name is Drew Janke. My business address is 30 West Superior Street, Duluth, MN  
4         55802.

5  
6   **Q.     By whom are you employed and in what position?**

7   A.     I am employed by ALLETE, Inc. d/b/a Minnesota Power as an environmental  
8         compliance specialist (II).

9  
10  **Q.     Please summarize your qualifications and experience.**

11 A.     I graduated with a Bachelor of Science degree in environmental science from the  
12         University of Minnesota Duluth. I have worked for Minnesota Power, in the  
13         Environment and Land Management department, since 2018. In this role, I am  
14         responsible for the federal, state, and local permitting processes for electric  
15         infrastructure projects owned by Minnesota Power.

16  
17  **Q.     Have you ever testified in any other proceeding before the Minnesota Public**  
18  **Utilities Commission (“Commission”)?**

19 A.     I have not.

20  
21  **Q.     What is the purpose of your Direct Testimony?**

22 A.     The purpose of my Direct Testimony is to provide a summary of the Boswell Solar  
23         Project, which includes an 85 megawatt (“MW”) alternating current (“MW<sub>ac</sub>”) solar  
24         facility and a 2.45 mile long 230 kilovolt (“kV”) transmission line (“Gen-Tie Line”)  
25         with appurtenant and interconnection facilities, (the “Project”), an update on permitting  
26         discussions with stakeholders who provided comments during the scoping comment  
27         period, and an initial review of the Environmental Assessment (“EA”) prepared by the  
28         Commission – Energy Infrastructure Permitting (“EIP”) Staff for the Project.

1 **Q. Are you sponsoring any schedules in this proceeding?**

2 A. Yes. I am sponsoring the following schedule to my Direct Testimony:

- 3 • Schedule 1 – Illustration of Access Roads.

4  
5 **II. THE PROJECT**

6 **Q. Please describe the Project.**

7 A. Minnesota Power is proposing to construct, own, and operate the Project. The Project  
8 will have a nameplate capacity of up to 85 MW<sub>ac</sub> photovoltaic (“PV”) solar energy  
9 generating facility, a 230 kV Gen-Tie Line and associated infrastructure in Itasca  
10 County, Minnesota.<sup>1</sup> Minnesota Power proposes to build the Project within an area of  
11 approximately 1,344.5 acres of privately owned land, of which 498.6 acres will be for  
12 the operation of the Project.<sup>2</sup> The Gen-Tie Line route will be approximately 2.45 miles  
13 in length and will interconnect the solar energy generating systems to the existing  
14 Minnesota Power Boswell Energy Center Substation.<sup>3</sup> Minnesota Power either owns or  
15 has obtained leases for each of the parcels necessary for the construction, ownership,  
16 and operation of the Project.<sup>4</sup>

17  
18 **Q. Why is Minnesota Power proposing the Project?**

19 A. In Minnesota Power’s 2021 Integrated Resource Plan, the Commission approved a  
20 settlement that required Minnesota Power to procure up to 300 MW of regional/in-  
21 service territory or net-zero solar energy.<sup>5</sup> The Project will generate carbon-free energy  
22 for customers, help Minnesota Power make progress on the Carbon Free and Renewable  
23 Energy Standards, boost the tax base of local economies, and create local union jobs.  
24 Siting a new solar project at the Boswell Energy Center is an intentional effort on behalf  
25 of Minnesota Power to reinvest in communities impacted by ceasing coal generation as

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<sup>1</sup> *In the Matter of the Joint Application of Minnesota Power for a Site and Route Permit for the 85-megawatt Boswell Solar Project and Associated 2.45-mile 230-kilovolt Transmission Line in Itasca County*, Docket No. E015/GS-24-425; E015/TL-24-426, Minnesota Power Site and Route Permit for the Boswell Solar Project at 1 (Dec. 30, 2024) (“Application”).

<sup>2</sup> Application at 1.

<sup>3</sup> Application at 1.

<sup>4</sup> Application at 8.

<sup>5</sup> Application at 1.

1 part of its transition to a cleaner energy future. Minnesota Power conducted a Request  
2 for Proposal (“RFP”) to meet this requirement with an emphasis on regional solar  
3 projects that are interconnected to Minnesota Power’s system.<sup>6</sup> The Project was selected  
4 through this RFP.<sup>7</sup>

5  
6 **Q. What is the proposed schedule for the Project?**

7 A. Minnesota Power proposes to start construction of the Project in early 2026 and begin  
8 commercial operation in the third quarter of 2027.<sup>8</sup>

9  
10 **Q. Is Minnesota Power proposing any changes to the Project from what was discussed**  
11 **in the Application?**

12 A. Other than some minor changes discussed below related to comments received during  
13 the scoping comment period that are discussed in Section III, Minnesota Power is not  
14 proposing any changes to the Project from what was proposed in the Application.

15  
16 **III. STAKEHOLDER AND TRIBAL NATION COMMENTS**

17 **Q. What is the purpose of this section of your Direct Testimony?**

18 A. In this section of my Direct Testimony, I provide an update on discussions with the  
19 Minnesota Department of Natural Resources (“MnDNR”), the Minnesota Department  
20 of Transportation (“MnDOT”), and the Fond du Lac Band of Lake Superior Chippewa  
21 (“Fond du Lac Tribal Nation”) all of which filed comments during the Project’s scoping  
22 comment period. I also provide an update on discussions with landowners who are  
23 located adjacent to the Project boundaries.

24  
25 **A. State Agencies**

26 **Q. What comments did the MnDNR provide during the scoping comment period?**

27 A. The MnDNR provided comments on the following topics:

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<sup>6</sup> Application at 1.

<sup>7</sup> Application at 1.

<sup>8</sup> Application at 3.

- 1) Requiring fencing of a minimum height of 10 feet to prevent wildlife from entering the Project's fenced area;
- 2) Requesting the use of downward facing lighting with a color temperature not to exceed 4,000 kelvin;
- 3) Advising against dust control agents that contain calcium or magnesium chloride;
- 4) Recommending use of wildlife-friendly erosion control, including bio-netting or natural-netting;
- 5) Identifying that a water appropriations permit is necessary if the Project intends to dewater at a rate exceeding 10,000 gallons per day;
- 6) Requesting that the EA discuss any water crossing permits that may be necessary for the Project;
- 7) Requesting that the EA discuss the presence of Native Plant Communities and measures to avoid or mitigate impacts to these resources;
- 8) Recommending the development of a vegetation management plan ("VMP") for the Project; and
- 9) Identifying certain parcels bordering the western portion of the Project's solar facility that have private surface and state mineral ownership of School Trust Lands.<sup>9</sup>

**Q. Have you met with the MnDNR to discuss these topics?**

A. Yes. A meeting was held between MnDNR and Minnesota Power staff on August 22, 2025, to discuss the MnDNR's recommended minimum fencing height of 10 feet. Minnesota Power's proposal to use seven-foot tall fencing is adequate to address the MnDNR concerns because while the fencing may allow deer to enter the fenced area, Minnesota Power will also install deer ramps to allow these wildlife to exit the fenced area. This configuration was approved in March 2025 for Minnesota Power's Regal Solar Project, which will start construction in the spring of 2026. While the MnDNR

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<sup>9</sup> *In the Matter of the Joint Application of Minnesota Power for a Site and Route Permit for the 85-megawatt Boswell Solar Project and Associated 2.45-mile 230-kilovolt Transmission Line in Itasca County*, Docket Nos. E015/GS-24-425 and E015/TL-24-426, Minnesota Department of Natural Resources Comments at 1-3 (April 28, 2025).

1 has not agreed to Minnesota Power's proposal, Minnesota Power requests the ability to  
2 continue its discussions with the MnDNR and discusses this more in Section IV, below.  
3 Additionally, Minnesota Power has confirmed with the MnDNR Office of School Trust  
4 Lands that their office does not have any additional comments regarding the Project.  
5

6 **Q. Does Minnesota Power have any information on the additional items included in**  
7 **the MnDNR's comments?**

8 A. Yes. Minnesota Power is willing to incorporate items 2-4 into the Project. As with other  
9 infrastructure projects, Minnesota Power anticipates a Site and Route Permit condition  
10 requiring a VMP for the Project. Further, Minnesota Power will obtain a water  
11 appropriations permit if dewatering at a rate of 10,000 gallons per day is necessary for  
12 the construction of the Project. Minnesota Power notes that items 6, 7 and 8 are covered  
13 in the EA at Sections 4.7.4 and 4.7.8.  
14

15 **Q. What comments did the MnDOT provide during the scoping comment period?**

16 A. The MnDOT provided comments related to:  
17 1) More analysis to ensure that the Project will not negatively impact highway water  
18 basins located near the proposed Project transmission line right-of-way;  
19 2) MnDOT-proposed changes to the Project's proposed access road layout; and  
20 3) Ensuring that the Project boundary does not overlap with any highway rights-of-  
21 way.<sup>10</sup>  
22

23 **Q. Have you met with the MnDOT to discuss their concerns?**

24 A. Yes, Minnesota Power met with MnDOT on June 4, 2025, to discuss the Project's  
25 proposed access road layout. Minnesota Power confirmed the ability to accommodate  
26 the shift MnDOT suggested to the southern access road location. The shift to the  
27 northern access road location was unfavorable due to the MnDOT-proposed location  
28 being in a low topographical area and within a delineated wetland. Minnesota Power

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<sup>10</sup> *In the Matter of the Joint Application of Minnesota Power for a Site and Route Permit for the 85-megawatt Boswell Solar Project and Associated 2.45-mile 230-kilovolt Transmission Line in Itasca County*, Docket Nos. E015/GS-24-425 and E015/TL-24-426, Minnesota Department of Transportation Comments at 1-2 (May 5, 2025).

1 confirmed that the existing access point would be removed following installation of the  
2 Minnesota Power-proposed access road, and MnDOT was agreeable to Minnesota  
3 Power proceeding with the originally proposed access road location. The agreed-upon  
4 changes are shown in **Schedule 1** to my Direct Testimony. Additionally, Minnesota  
5 Power will coordinate with MnDOT on the final design of the Project's stormwater  
6 basin locations to assess whether a modeling review and/or drainage permit(s) will be  
7 required.

8  
9 **B. Fond du Lac Tribal Nation**

10 **Q. What comments did the Fond du Lac Tribal Nation provide during the scoping**  
11 **comment period?**

12 A. The Fond du Lac Tribal Nation sought additional information on the potential increased  
13 run-off (from the solar panels) that may reach the Mississippi River in the Project area.<sup>11</sup>  
14

15 **Q. Have you discussed these concerns with the Fond du Lac Tribal Nation?**

16 A. Minnesota Power meets with representatives from the Fond du Lac Tribal Nation  
17 regularly and has addressed this concern. The Project is designing stormwater retention  
18 basins that will be included in Projects Construction Stormwater Pollution Prevention  
19 Plan, subject to Minnesota Pollution Control Agency review, to properly manage  
20 stormwater runoff. Minnesota Power will continue engagement with Tribal Nations to  
21 ensure concerns are adequately addressed. .  
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<sup>11</sup> *In the Matter of the Joint Application of Minnesota Power for a Site and Route Permit for the 85-megawatt Boswell Solar Project and Associated 2.45-mile 230-kilovolt Transmission Line in Itasca County*, Docket Nos. E015/GS-24-425 and E015/TL-24-426, Fond du Lac Band Comments (April 1, 2025).

1           **C.     Individual Comments**

2   **Q.     Did additional individuals provide comments on the Project during the scoping**  
3   **comment period?**

4   A.     Yes. During the scoping comment period, two landowners provided written  
5           comments.<sup>12</sup> Six individuals spoke at the public information meetings for the Project.<sup>13</sup>  
6           Of those who spoke at the public information meetings, four individuals spoke in  
7           support of the Project;<sup>14</sup> one requested more information on if the Project would impact  
8           the value of his property, whether vegetative screening might be feasible between his  
9           property and the Project, if there would be any restrictions on herbicide use for the  
10          Project, how trees would be removed from the Project area, and general information  
11          about the solar panels and their operation;<sup>15</sup> and one sought a better understanding of  
12          how Minnesota Power may place vegetation along the Project boundaries and the type  
13          of fencing that will be used around the perimeter.<sup>16</sup>  
14

15   **Q.     Have you followed up individually with either of the individuals who had questions**  
16   **at the public information and scoping meetings?**

17   A.     At the public information and scoping meetings, Minnesota Power responded to many  
18           of the questions asked by these two individuals. Additionally, a third landowner  
19           contacted Minnesota Power outside the comment period. We have been able to discuss  
20           individual concerns with two landowners in the vicinity of the Project but have not been  
21           able to meet with all three of these landowners. For one of the landowners, we were able  
22           to identify some opportunities for additional visual screening between their property  
23           and the Project. For the other landowner, their property is already wooded and additional  
24           vegetation would not provide increased screening. Further, as EIP Staff stated at those

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<sup>12</sup> *In the Matter of the Joint Application of Minnesota Power for a Site and Route Permit for the 85-megawatt Boswell Solar Project and Associated 2.45-mile 230-kilovolt Transmission Line in Itasca County*, Docket Nos. E015/GS-24-425 and E015/TL-24-426, Environmental Assessment Scoping Decision at 3 (May 30, 2025) (“EA Scoping Decision”).

<sup>13</sup> EA Scoping Decision at 6.

<sup>14</sup> Cohasset Pub. Hrg. Tr. at 20:19-25:21 (April 22, 2025).

<sup>15</sup> Cohasset Pub. Hrg. Tr. at 25:25-31:14 (Best) (April 22, 2025).

<sup>16</sup> Cohasset Pub. Hrg. Tr. at 31:15-37:15 (Mann) (April 22, 2025).

1 public information and scoping meetings, many of these topics would be addressed in  
2 the EA. I discuss vegetative screening further in Section IV, below.

3  
4 **IV. THE ENVIRONMENTAL ASSESSMENT**

5 **Q. Have you reviewed the EA?**

6 A. Yes. I have completed an initial review of the EA issued by EIP Staff on August 27,  
7 2025. Minnesota Power appreciates the work that EIP Staff put into developing the EA  
8 for the Project.

9  
10 **Q. Does Minnesota Power have any initial comments on the EA?**

11 A. Minnesota Power appreciates EIP's work to develop the EA for the Project. At this time,  
12 Minnesota Power has limited comments related to Site and Route Permit Conditions  
13 regarding pesticide application, Project perimeter security fencing, and vegetative  
14 screening.

15  
16 **Q. What comments do you have regarding Section 4.3.19 of the Draft Site and Route  
17 Permit in Appendix C of the EA?**

18 A. Section 4.3.19 of the Draft Site and Route Permit provides, "The Permittee shall provide  
19 notice of pesticide application to landowners and beekeepers operating known apiaries  
20 within three miles of the pesticide application area at least 14 days prior to such  
21 application."<sup>17</sup> Minnesota Power respectfully requests that this condition include the  
22 following language, which the Commission recently approved in the Northland  
23 Reliability Docket: "The [Permittee] shall use the Minnesota Department of  
24 Agriculture's Apiary Registry (<https://mn.beecheck.org/map>) to identify apiaries for  
25 purposes of compliance with this condition."<sup>18</sup>

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<sup>17</sup> *In the Matter of the Joint Application of Minnesota Power for a Site and Route Permit for the 85-megawatt Boswell Solar Project and Associated 2.45-mile 230-kilovolt Transmission Line in Itasca County*, Docket Nos. E015 and GS-24-425; E015/TL-24-426, Environmental Assessment at Appendix C, Section 4.3.19 (August 27, 2025).

<sup>18</sup> *In the Matter of the Application of Minnesota Power and Great River Energy for a Certificate of Need and Route Permit for an Approximately 180-mile, Double Circuit 345-kV Transmission Line*, Docket Nos. E015, ET2/TL-22-415 and E015, ET2/CN-22-416, Order at 17 (Feb. 28, 2025).

1  
2 **Q. Please explain Minnesota Power’s comments on the discussion of security fencing**  
3 **for the Project perimeter in the EA.**

4 A. Yes.<sup>19</sup> The EA discusses that Minnesota Power proposes to use a seven-foot high fence  
5 with three to six inches of Stay-Tuff Deer Fence Wire 1775-6 Class 3 and a single  
6 barbed wire nine inches above the fence fabric.<sup>20</sup> Further, the Draft Site and Route  
7 Permit at Appendix C of the EA proposes a permit condition that provides: “The  
8 Permittee shall develop a final fence plan for the specific site in coordination with the  
9 Commission and the [Mn]DNR. The final fence plan shall be submitted to the  
10 Commission as part of the Site Plan pursuant to Section 8.3.”<sup>21</sup> Minnesota Power  
11 supports this condition to continue its coordination with the MnDNR, as discussed in  
12 Section III.A of my Direct Testimony.  
13

14 **Q. What comments does Minnesota Power have on vegetative screening?**

15 A. Minnesota Power appreciates the proposed special condition (Section 5.1) in the Draft  
16 Site and Route Permit in Appendix C of the EA. By not prejudging any particular  
17 placement of vegetation at this stage of the Project, Minnesota Power can continue  
18 discussions with landowners, as applicable. The proposed special condition ensures  
19 oversight by the Commission via the required pre-construction compliance filing. The  
20 special condition proposed by EIP in the EA is sufficient to address visual or vegetative  
21 screening requests by adjacent landowners.  
22

23 **Q. Do you have any other comments on the EA?**

24 A. Not at this time. However, Minnesota Power continues to review the EA and will  
25 provide any additional comments by the close of the public hearing comment period on  
26 September 25, 2025.  
27

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<sup>19</sup> EA at 19-20.

<sup>20</sup> EA at 19-20.

<sup>21</sup> EA at Appendix C, Section 4.3.32.

**V. CONCLUSION**

1



2 **Q. Does this complete your Direct Testimony?**

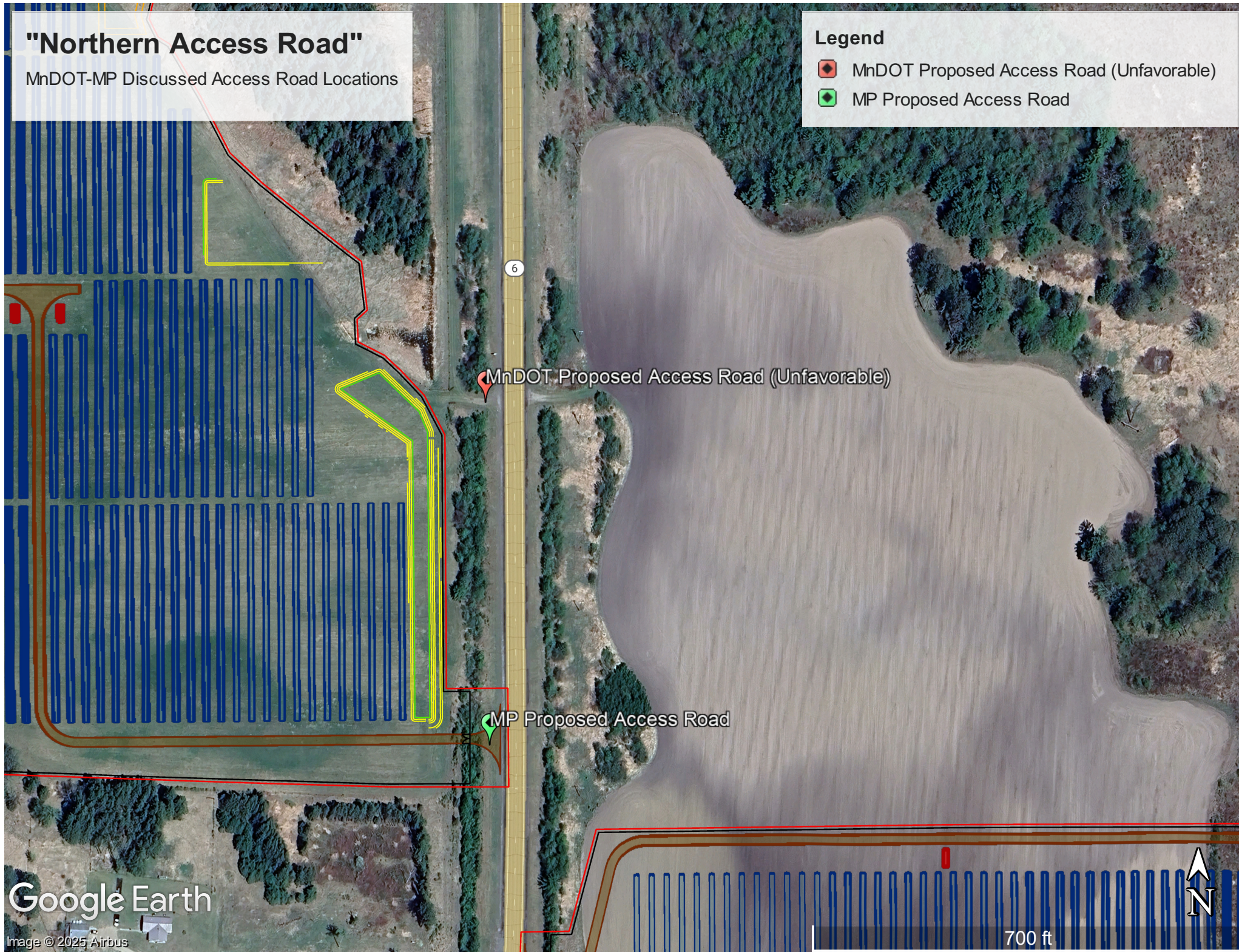
3 **A. Yes.**

# "Northern Access Road"

MnDOT-MP Discussed Access Road Locations

## Legend

-  MnDOT Proposed Access Road (Unfavorable)
-  MP Proposed Access Road



Google Earth



Image © 2025 Airbus

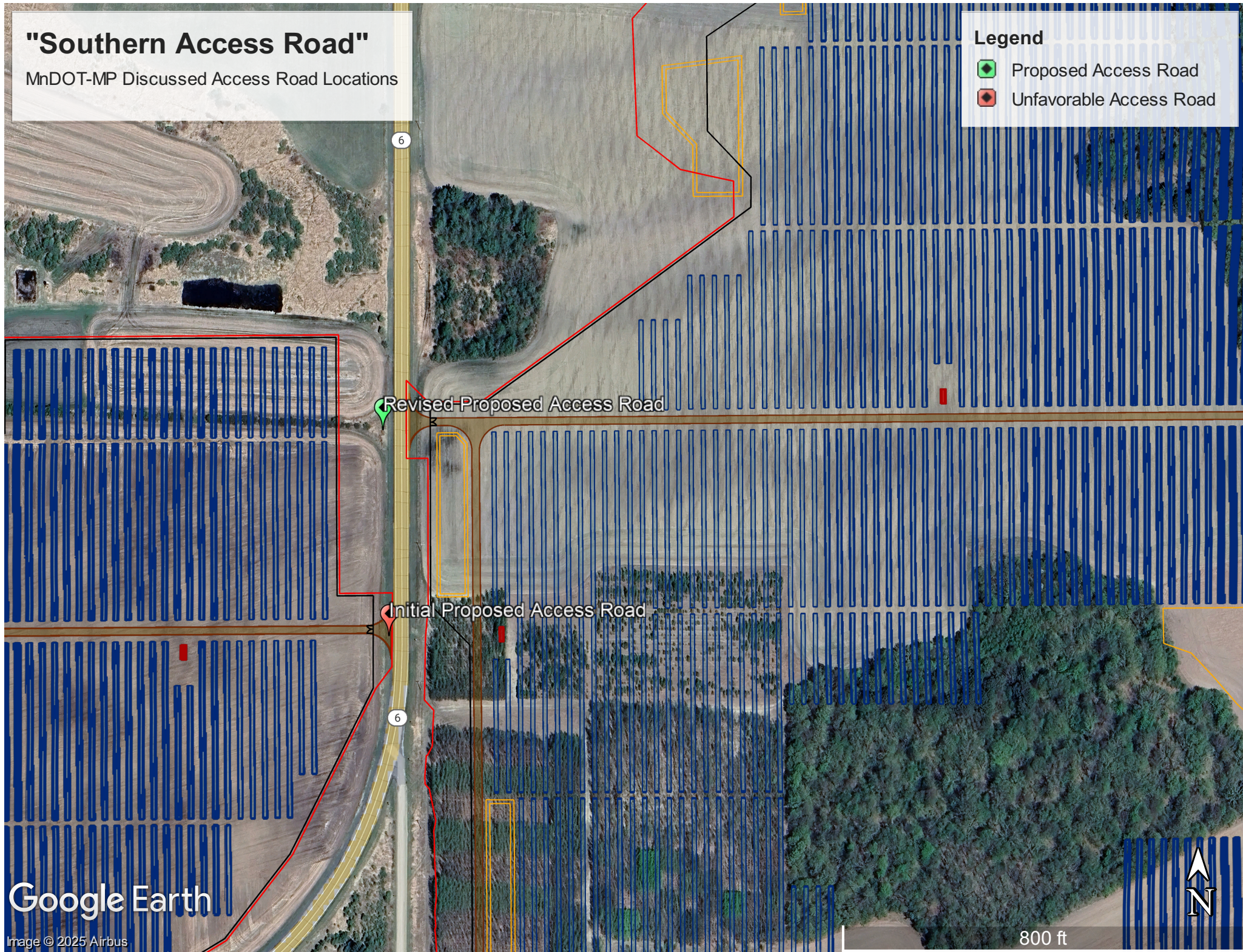
700 ft

# "Southern Access Road"

MnDOT-MP Discussed Access Road Locations

## Legend

-  Proposed Access Road
-  Unfavorable Access Road



Google Earth

Image © 2025 Airbus

800 ft

