

Direct Testimony and Schedules

Tyler S. Beemer

Before the Minnesota Public Utilities Commission
State of Minnesota

In the Matter of the Application of Northern States Power Company D/B/A Xcel
Energy for an up to 135.5 MW Battery Energy Storage System Site Permit for the
Blue Lake Battery Energy Storage Project in Scott County, Minnesota

MPUC Docket No. E002/ESS-25-214
CAH Docket No. 25-2500-41199
Exhibit___(TSB-1)

**Direct Testimony of Tyler Beemer
on behalf of Xcel Energy**

December 19, 2025

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Schedules

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1 I. INTRODUCTION

2
3 Q. PLEASE STATE YOUR NAME AND OCCUPATION.

4 A. My name is Tyler S. Beemer. I am an Associate Environmental Scientist at
5 Burns & McDonnell Engineering, Inc. (Burns), located at 5600 American Blvd
6 W, Suite 300, Bloomington, MN 55437.

7
8 Q. PLEASE SUMMARIZE YOUR QUALIFICATIONS AND EXPERIENCE.

9 A. I graduated from the University of Illinois in 2006 with a bachelor's degree in
10 Geological and Earth Sciences/Geosciences and obtained my master's degree
11 in environmental science in 2007 from Oregon State University. I have been an
12 environmental scientist with Burns for 17 years. In that time, I have led and
13 managed field survey efforts for wetland delineations, habitat assessments, and
14 stormwater inspections. Currently, I largely manage environmental assessment
15 and permitting-related efforts for various energy infrastructure projects.

16
17 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?

18 A. The purpose of my testimony is to provide a general description of the Blue
19 Lake battery energy storage system (ESS) project (Project or Blue Lake) and its
20 on-going development efforts. Specifically, I will provide an update on
21 interconnection efforts, Project design changes, agency coordination, and status
22 of Xcel Energy's comments to the recently filed Environmental Assessment (EA).

23
24 Q. FOR WHOM ARE YOU TESTIFYING?

25 A. I am testifying on behalf of Northern States Power Company, doing business
26 as Xcel Energy (Xcel Energy) in support of its Application for a Site Permit for
27 the up to 135.5 megawatt (MW) Blue Lake ESS (Application).

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Q. WHAT IS YOUR ROLE WITH RESPECT TO THE PROJECT?

A. I am the Project Manager. I have been accountable for permitting activities.

Q. PLEASE PROVIDE A SUMMARY OF YOUR TESTIMONY.

A. My testimony supports the Application for an up to 135.5 MW ESS interconnecting at Blue Lake in the city of Shakopee. As Project Manager, I provide status updates on schedule, design, interconnection, engagement, and environmental and cultural review. The schedule and design remain unchanged, with construction anticipated in the second quarter of 2026. Key developments include execution of the Midcontinent Independent System Operator, Inc. (MISO) Generator Interconnection Agreement (GIA) and continued engagement with the Shakopee Mdewakanton Sioux Community.

Q. HOW IS YOUR TESTIMONY STRUCTURED?

A. My testimony first provides a Project overview and updates on schedule and design, interconnection, tribal engagement, cumulative impacts, and adjacent facilities. Next, it addresses environmental and cultural coordination and notes Xcel Energy’s ongoing review of the EA. The testimony closes with a summary and recommendations.

Q. WHAT SCHEDULES ARE ATTACHED TO YOUR DIRECT TESTIMONY?

A. The following schedules are attached to my Direct Testimony:

Schedule 1: Statement of Qualifications

Schedule 2: Habitat Assessment and Rare Plant Survey Report

1 Q. ARE THERE ANY OTHER WITNESSES ADDRESSING ISSUES RELATED TO THE
2 PROJECT?

3 A. Not at this time.
4

5 II. PROJECT OVERVIEW 6

7 Q. PLEASE PROVIDE A SUMMARY OF THE PROJECT, INCLUDING THE PROPOSED
8 LOCATION AND THE PROPOSED SITE.

9 A. The Project consists of a proposed up to 135.5 MW ESS located in the eastern
10 portion City of Shakopee in Scott County, Minnesota immediately north of US-
11 169 and south of County Road 101 (Highway 101). The Project will require a
12 single-span 115 kV gen-tie line that is less than five hundred feet in length to
13 interconnect the ESS at the Blue Lake Generating Station.
14

15 Q. WHY DID XCEL ENERGY CHOOSE THE PROJECT AREA AS PRESENTED IN THE
16 APPLICATION TO BUILD THE PROJECT?

17 A. Xcel Energy holds full ownership of the land designated for the Project. To
18 select the proposed location, Xcel Energy undertook an iterative evaluation
19 that weighed multiple considerations, including environmental impacts,
20 setbacks, areas that were unavailable or restricted, construction constraints, and
21 landowner preferences. The chosen site is well suited for ESS development due
22 to its proximity to existing electric transmission infrastructure and a generating
23 station, the extent of land under control, compatibility with surrounding land
24 uses, limited effects on natural and cultural resources, and minimal impacts on
25 prime farmland.
26

1 **III. PROJECT UPDATES**

2
3 Q. HAS THE ANTICIPATED SCHEDULE FOR THE CONSTRUCTION OF THE PROJECT
4 CHANGED FROM WHAT WAS CONTEMPLATED IN THE APPLICATION?

5 A. No. Xcel Energy continues to anticipate that construction of the Project would
6 begin between the second quarter of 2026 with an anticipated commercial
7 operation date by the second quarter of 2027.

8
9 Q. HAVE THERE BEEN ANY UPDATES RELATED TO THE PROJECT’S DESIGN SINCE
10 XCEL ENERGY FILED THE APPLICATION?

11 A. No. The Project’s design is effectively unchanged.

12
13 Q. HAVE THERE BEEN ANY OTHER UPDATES RELATED TO THE PROJECT SINCE
14 XCEL ENERGY FILED THE APPLICATION?

15 A. Yes. While the Project’s design remains effectively unchanged, there have been
16 several discrete updates since the Application. Most of the updates have already
17 been provided to the Minnesota Public Utilities Commission (Commission or
18 MPUC) through recent informal data request responses.

19
20 Q. HAS XCEL ENERGY FURTHER ENGAGED WITH MINNESOTA TRIBES REGARDING
21 THE PROJECT?

22 A. Yes. On June 24, 2025, Xcel Energy provided the Shakopee Mdewakanton
23 Sioux Community Tribe an eDockets link to the Application and cultural
24 resources report; the Tribe acknowledged receipt on June 27. With limited
25 discussion, the Tribe expressed its appreciation that the Project is proposed
26 south of Highway 101.

1 Q. HOW HAS THE STATUS OF THE MISO GIA CHANGED SINCE XCEL ENERGY
2 FILED THE APPLICATION?

3 A. Xcel Energy and MISO executed the GIA on October 31, 2025.
4

5 Q. HAVE THERE BEEN UPDATES TO CUMULATIVE IMPACTS REGARDING NEARBY
6 THIRD-PARTY ACTIVITIES?

7 A. Yes. Magellan Midstream Partners, L.P. intends to establish a new access road
8 route to preserve access to its metering station located just east of the Project
9 footprint. Xcel Energy understands that the design for this access road remains
10 under development; however, it is anticipated to be comparable to the existing
11 access road in terms of width, surface, and general specifications, and may be
12 aligned along the eastern and northern boundaries of the parcel containing the
13 Project.
14

15 Q. ARE THERE ANY NEARBY FACILITY CHANGES RELEVANT TO CUMULATIVE
16 IMPACTS?

17 A. Yes. The Blue Lake Generating Facility intends to decommission and remove
18 two idle fuel storage tanks located along the west side of the site. Removing
19 these units will not alter the facility's current site boundaries. While a detailed
20 schedule has not been set, the work is expected to occur within the next five

1 years, and no additional construction activities are planned at the Blue Lake
2 Generating Facility during that period.

3
4 Q. HAVE THERE BEEN CHANGES REGARDING MINNESOTA DEPARTMENT OF
5 NATURAL RESOURCES (MNDNR) NATURAL HERITAGE INFORMATION SYSTEM
6 (NHIS) AND STATE-LISTED SPECIES?

7 A. After an initial “no species anticipated” indication, MnDNR noted in
8 September 2025 a nearby occurrence record. A species-specific survey on
9 September 26, 2025 found the species was not present. MnDNR confirmed on
10 December 1 that no further surveys are required. The assessment summary was
11 provided in Xcel Energy’s response to Data Request No. 4 on November 21,
12 and Xcel Energy forwarded to the MPUC the MnDNR concurrence on
13 December 1.

14
15 **IV. COORDINATION WITH SHPO**

16
17 Q. DO YOU HAVE ANY UPDATES REGARDING STATE HISTORIC PRESERVATION
18 OFFICE (SHPO) COORDINATION SINCE THE APPLICATION WAS FILED?

19 A. Yes. On August 26, 2025, Xcel Energy submitted the Project’s Phase I cultural
20 resources report to SHPO via email. On November 14, Xcel Energy followed
21 up with SHPO regarding the status of its review. SHPO indicated that a
22 response had been issued in October 2025; however, neither Xcel Energy nor
23 its consultants had any record of receiving it. SHPO provided the response a
24 second time on November 16. In that letter, SHPO requested additional
25 information regarding the results of the shovel testing in order to complete its
26 review. Xcel Energy again inquired about the review status, and on November
27 16, SHPO confirmed that additional information is required. An updated Phase

1 I cultural resources report with requested additional information was emailed to
2 SHPO on December 5 and subsequently uploaded in the Office of the State
3 Archaeologist (OSA) portal.

4
5 **V. COMMENTS ON THE EA**

6
7 Q. HAVE YOU RECEIVED THE EA PREPARED BY THE ENERGY INFRASTRUCTURE
8 PERMITTING (EIP) UNIT FOR THE PROJECT?

9 A. Yes. Because it was issued on December 17, 2025. Xcel Energy is still
10 completing a thorough review of the EA. Xcel Energy will submit its comments,
11 if any, by the close of the public comment period on January 20, 2026.

12
13 **VI. CONCLUSION**

14
15 Q. PLEASE SUMMARIZE YOUR TESTIMONY AND RECOMMENDATIONS.

16 A. The Project remains on track and materially consistent with the Application,
17 with construction anticipated in the second quarter of 2026 and commercial
18 operation in the second quarter of 2027; the design is unchanged. Based on this
19 record, Xcel Energy requests that the Commission approve the Application
20 subject to standard, reasonable conditions, including completion of SHPO's
21 requested supplemental information and continued agency and stakeholder
22 coordination, as the Project satisfies the applicable siting criteria and potential

1 impacts are minimized through application of the standard conditions included
2 in the Commission's sample site permit.

3

4 Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

5 A. Yes, it does.

6

Tyler S. Beemer

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Email: tbeemer@burnsmcd.com

Professional Summary

Environmental Scientist with over 19 years of experience, including 17 years with Burns & McDonnell. Specializes in environmental permitting and project management for large-scale energy and infrastructure developments, including utility-scale battery energy storage systems, natural gas generation facilities, high-voltage transmission lines, gas pipelines, solar, and wind projects. Proven expertise in coordinating with federal and state agencies such as the U.S. Army Corps of Engineers, U.S. Fish & Wildlife Service, and state Departments of Natural Resources across 20+ states. Recognized for leading multi-disciplinary teams and delivering environmentally sound, compliant, and practical project solutions.

Education

- M.S. Environmental Science, Oregon State University, 2007
- B.S. Geology and Earth Science, University of Illinois Urbana-Champaign, 2006

Certifications and Professional Associations

- Professional Wetland Scientist (PWS #2816)
- Minnesota Wetland Delineator (ID 1251)
- Minnesota Wetland Professionals Association
- Society of Wetland Scientists

Professional Experience

Burns & McDonnell – Bloomington, MN | Associate Environmental Scientist (2008–Present)

Oversees environmental permitting, compliance, and field survey coordination for complex energy and infrastructure developments. Manages siting, analysis, and permitting for renewable energy, battery storage, transmission, and natural gas projects. Experienced in wetland delineations, NEPA documentation, and GIS-based environmental analysis. Leads coordination with federal and state agencies under the Clean Water Act, Endangered Species Act, and related environmental regulations.



**XCEL BLUE LAKE BATTERY ENERGY
STORAGE PROJECT HABITAT
ASSESSMENT AND RARE PLANT SURVEY
REPORT**

November 12, 2025

Prepared for:
Xcel Energy

Prepared by:
Stantec Consulting Services Inc.

Stantec Project Number: 227707955

The conclusions in the Report titled Xcel Blue Lake Project Rare Plant Survey are Stantec's professional opinion, as of the time of the Report, and concerning the scope described in the Report. The opinions in the document are based on conditions and information existing at the time the scope of work was conducted and do not take into account any subsequent changes. The Report relates solely to the specific Project for which Stantec was retained and the stated purpose for which the Report was prepared. The Report is not to be used or relied on for any variation or extension of the Project, or for any other project or purpose, and any unauthorized use or reliance is at the recipient's own risk.

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This Report is intended solely for use by the Client in accordance with Stantec's contract with the Client. While the Report may be provided to applicable authorities having jurisdiction and others for whom the Client is responsible, Stantec does not warrant the services to any third party. The report may not be relied upon by any other party without the express written consent of Stantec, which may be withheld at Stantec's discretion.

Reviewed by:


Signature

Scott Krych, Senior Ecologist

Printed Name

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1 Background

Stantec Consulting Services Inc. (Stantec) was hired by Xcel Energy to conduct a habitat assessment and rare plant species survey for the Blue Lake Battery Energy Storage Project (Project) in Shakopee, Minnesota. The Project is centred on Latitude 44.78807, Longitude 93.42664, Scott County, Minnesota. The Project site evaluated is depicted in Figure 1. Due to the urgency of the Project timeline, a review of protected species was conducted using Stantec's Minnesota's Conservation Explorer (MCE) license and a survey was conducted prior to receiving a response from the Minnesota Department of Natural Resource (DNR) Natural Heritage Information System (NHIS) staff. The Project's urgency precluded review of a survey plan prior to conducting surveys. However, that survey plan was submitted to the DNR on September 24, 2025. Subsequent feedback from Minnesota DNR NHIS staff may require that the report be updated with additional information and resubmitted for review.

2 Regulatory Framework

2.1 Endangered And Threatened Species

Threatened and endangered species are protected at the federal level under the Endangered Species Act of 1973 (ESA). The federal ESA protects listed species and their habitats. No species protected under the ESA occur within the site.

Minnesota's Endangered Species Statute (Minnesota Statutes, Section 84.0895) requires the DNR to adopt rules designating species meeting the statutory definitions of Endangered and Threatened species. The resulting list of Endangered, Threatened, and Special Concern Species (TES) are codified as Minnesota Rules, Chapter 6134. The Endangered Species Statute also authorizes the DNR to adopt rules that regulate treatment of species designated as endangered and threatened. These regulations are codified as Minnesota Rules, Parts 6212.1800 to 6212.2300. TES species, as defined by the DNR as endangered, threatened, and special concern are defined as:

- Minnesota Endangered Species: is a plant or animal species that is threatened with extinction throughout all or a significant portion of its range in Minnesota.
- Minnesota Threatened Species: is a plant or animal species that is likely to become endangered within the foreseeable future throughout all or a significant portion of its range in Minnesota.
- Minnesota Special Concern Species are species that are not endangered or threatened, but are extremely uncommon in Minnesota, or have unique or highly specific habitat requirements and deserve careful monitoring of their status. Species on the periphery of their range that are not listed as threatened may be included in this category, along with those species that were once threatened or endangered but now have increasing or protected, stable populations.

2.2 Rare Plant Associations

The Project is located within the Minnesota and Northeast Iowa Morainal Section of the Eastern Broadleaf Forest Province. This Section of deciduous forest, woodland and prairie lies in a band that stretches from Polk County in the northwest part of the state to the Minnesota/Iowa border. The majority of this Section consists of uneven moraines deposited along the eastern margin of the Des Moines lobe during the last glaciation. Presettlement vegetation was dictated by moisture, nutrient availability, and the fires that accompanied those fluctuations. The characteristic sandy soils and vegetation communities on the Project were deposited by loads carried by the Glacial River Warren. The Minnesota River occupies the lowest portion of this glacial river valley and has developed floodplain and terrace forests along its path. Native plant communities within this Section includes Fire-Dependent Forest or Woodlands, Upland Prairie, Mesic Hardwood Forests, Wet Prairies, Wet Meadow Carr, Marshes, and Rich Fens.

Upland prairie and woodland areas on the Project are characterized by variety of trees and areas maintained as open land for the purpose of transmission lines, roads and transfer stations. Prior to development of this site, the area was likely characterized as a Dry Barrens Oak Savanna and Upland Prairie communities with oaks and openings which were dominated by prairie grasses and forbs.

3 Methodology

Prior to conducting field survey work, Stantec identified state-listed TES with potential to occur at the site. Table 1 lists potential species based on TES occurrences in the DNR NHIS database within one mile of the Project. Additional potential species were identified based on the Project location and aerial-imagery review of potential habitats, as well as species identified in reports for similar previous efforts in the area. Species in Table 1 were identified for review by accessing the MCE.

Table 1 - List of TES with potential to occur at the Project site

SCIENTIFIC NAME	COMMON NAME	SURVEY PERIOD	MN STATUS
TES documented in the vicinity of the site:			
<i>Oenothera rhombipetala</i>	Rhombic Evening Primrose	June - October	SC
Other TES with potential to be at the site:			
<i>Orobanche ludoviciana</i> var. <i>ludoviciana</i>	Louisiana broomrape	June - October	THR
Potential Rare Natural Communities			
<i>Dry Barrens Oak Savanna (Southern) Oak Subtype (Ups14a2)</i>	Oak Savanna	April - October	High

Based on the list of TES plants with potential to occur at the site and the seasonal timing of Project initiation, Stantec determined to conduct a fall visit to search for fall-blooming species as well as a site-wide habitat evaluation. Field work began in September 2025 to enable detection of TES most likely observable at that time.

Stantec Senior Ecologists Paul Bockenstedt and Scott Krych conducted an on-foot, intuitive meander survey on September 26, 2025, to search for species identified in Table 1. The September survey included walking the entire Project site to search for protected species. Habitats with potential to host rare plants were more thoroughly searched by walking transects generally separated by no more than 50 feet, and more closely in circumstances where vertical vegetation structure required more detailed visual inspection.

Information gathered during the September field visit included collecting general notes on habitat composition and structure and compiling a plant species list to generally characterize habitats (Appendix A). Rare plant populations were documented if present, utilizing iPad-based ArcGIS Online Field Maps with spatial accuracy of 20 feet or less when encountered. Data gathered on rare plant population context followed the DNR "Guidance on Documenting and Collecting Rare Plants."

4 Results

The results section includes a description of the extent of survey efforts, summary of findings, characterization of key land cover areas and survey information related to TES listed in Table 1.

4.1 Survey Methods

Stantec made a concerted effort to view all areas of existing land cover with the potential for supporting TES plant species during the field visit in September 2025.

Vegetation was cataloged and examined during a searcher directed evaluation of the site. Where existing plant communities occur on the Project, pedestrian surveys examining species composition and ecological niche conditions where protected species may occur received focused search efforts.

4.2 Land Cover

The Project site is characterized by moderately to significantly disturbed habitats. The entire site exhibited some level of disturbance from road construction, facility construction, ATV or maintenance vehicle use, existing transmission line structures and right-of-way maintenance.

Patches of woodland and sand prairie communities occurred on the Project site. Areas within the center of the transmission line corridor and in open areas are dominated by shrubs or shrub height trees such as pin oak (*Quercus ellipsoidal*), bur oak (*Quercus macrocarpa*), green ash (*Fraxinus pennsylvanica*),

Siberian elm (*Ulmus pumila*), and red raspberry (*Rubus ideaus*). Grasses and forbs at the include smooth brome (*Bromus inermis*), Kentucky bluegrass (*Poa pratensis*), spotted knapweed (*Centaurea stoebe*), Canada thistle (*Cirsium arvense*), yellow sweetclover (*Melilotus officinalis*), and native species such as big bluestem (*Andropogon gerardii*), little bluestem (*Scizachyrium scoparium*), panic grass (*Panicum virgatum*), side-oats grama (*Bouteloua citripendula*), blue grama (*Bouteloua gracilis*), prairie sandreed (*Calamovilfa longifolia*), purple lovegrass (*Eragrostis spectabilis*), Scribner's panic grass (*Dicanthelium oligosanthes*), openings are dominated by these species and harbor several native forbs such as leadplant (*Amorpha canescens*), hairy yellow aster (*Heterotheca villosa*), silky prairie clover (*Dalea villosa*), purple prairie clover (*Dalea purpurea*), bird's foot coreopsis (*Coreopsis palmata*), and hoary puccoon (*Lithospermum canescens*). Much of the site is affected by large infestations of non-native and problematic species that include common buckthorn (*Rhamnus cathartica*), bouncing bet (*Saponaria officinales*), spotted knapweed (*Centaurea stoebe*), and Siberian elm.

Woodland areas on the Project site are characterized as low quality Dry Barrens Oak Savanna (Southern) (Ups14a2) Oak subtype. The woodland canopy was dominated by bur oak and northern pin oak with eastern red cedar (*Juniperus virginiana*) and quaking aspen (*Populus tremuloides*). Oak canopy cover was generally moderate with species such as green ash, Siberian elm, hackberry (*Celtis occidentalis*) and common buckthorn being abundant. The shrub layer was highly variable in cover, ranging from sparse to moderately thick, that included chokecherry (*Prunus virginiana*), prickly ash (*Zanthoxylum americanum*), red raspberry, and common buckthorn being locally abundant.

4.3 Species survey information

This section includes summaries of survey information for each species targeted for survey conducted during the September 26, 2025 surveys.

4.3.1 LOUISIANA BROOMRAPE (OROBANCHE LUDOVICIANA VAR. LUDOVICIANA)

The DNR states that "*Orobanche ludoviciana* occurs in habitats classified as northern dry prairie and southern dry prairie (including dunes), and in northern dry savanna and southern dry savanna, particularly in areas with excessively drained, loose and sandy or gravelly soil. These habitats tend to have sparse vegetation dominated by grasses and well drained (droughty) soils. Habitats are not always pristine natural areas, though they seem to be dominated by native prairie species even though species diversity may be low. Typical associates include *Artemisia* spp., hairy golden aster, dotted blazing star, blue grama, and other dry prairie species."

Several areas within the Project site harbor soil, host plant associates and conditions consistent with the presence of *Orobanche ludoviciana*. However, no occurrences of this species were detected during the September review of the site. Another site south of the Project in Scott County with known populations of this species was evaluated the same day and *O. ludoviciana* was present and blooming at that site. Therefore, the timing of surveys on the Project site should be considered acceptable.

4.3.2 RHOMBIC EVENING PRIMROSE (*OENOTHERA RHOMBIPETALA*)

This species was not identified during our review of the Project site. However, the presence of sand substrates provides potential for the species to occur. This biennial occurs exclusively in dry and loose sand in sand savannas, sand prairies, and dunes, where vegetation is sparse. The plants typically grow in full sunlight, though there may be scattered oak trees or oak groves in the vicinity, especially bur, northern pin oak among others.

The Project site where sand occurs were examined but none were found within the Project.

5 Conclusions

No federally protected species were observed during the Project evaluation conducted by Stantec ecologists on September 26, 2025. Additionally, none of the species protected by the State of Minnesota identified in Table 1 were found on the Project after searches conducted during appropriate flowering dates for both *Orobanche ludoviciana* and *Oenithera rhombipetala*.

Appendix A Plant Species Lists

Scientific Name	Common Name	Frequency Encountered
<i>Achillea millefolium</i>	common yarrow	Rarely
<i>Ageratina altissima</i> var. <i>altissima</i>	white snakeroot	Abundant
<i>Alliaria petiolata</i>	garlic mustard	Occasional
<i>Ambrosia artemissifolia</i>	common ragweed	Abundant
<i>Ambrosia psilostachya</i>	western ragweed	Abundant
<i>Amorpha canescens</i>	leadplant	Occasional
<i>Andropogon gerardii</i>	big bluestem	Infrequent
<i>Anemone cylindrica</i>	long-headed thimbleweed	Rarely
<i>Antennaria plantaginifolia</i>	plantain-leaved pussytoes	Rarely
<i>Apocynum cannabinum</i>	American hemp	Infrequent
<i>Aralia nudicaulis</i>	wild sarsaparilla	Infrequent
<i>Artemisia ludoviciana</i> subsp. <i>ludoviciana</i>	white sage	Occasional
<i>Asclepias syriaca</i>	common milkweed	Occasional
<i>Asclepias verticillata</i>	whorled milkweed	Occasional
<i>Berteroa incana</i>	hoary alyssum	Abundant
<i>Bouteloua curtipendula</i>	side-oats grama	rarely
<i>Bouteloua gracilis</i>	blue grama	Occasional
<i>Botrypus virginianum</i>	rattlesnake fern	Rarely
<i>Brachyelytrum erectum</i>	bearded shorthusk	Occasional
<i>Bromus inermis</i>	smooth brome	Infrequent
<i>Bromus tectorum</i>	cheatgrass	Rarely
<i>Calamovilfa longifolia</i> var. <i>longifolia</i>	prairie sandreed	Occasional
<i>Canabus sativa</i>	hemp	Infrequent
<i>Carex blanda</i>	charming sedge	Infrequent
<i>Carex brevior</i>	short sedge	Occasional
<i>Carex umbellata</i>	parasol sedge	Rarely
<i>Celtis occidentalis</i>	hackberry	Rarely
<i>Cenchrus longispinus</i>	sandbur	Rarely
<i>Centaurea stoebe</i> subsp. <i>micranthos</i>	spotted kanpweed	abundant
<i>Circaea lutetiana</i> var. <i>canadensis</i>	common enchanter's nightshade	Abundant
<i>Cirsium altissimum</i>	tall thistle	Rarely
<i>Comandra umbellata</i>	bastard toadflax	Rarely
<i>Coreopsis palmata</i>	bird's foot coreopsis	Rarely
<i>Coronilla varia</i>	crownvetch	Rarely
<i>Cyperus schweinitzii</i>	Schweinitz's nut sedge	Occasional
<i>Dalea purpurea</i> var. <i>purpurea</i>	purple prairie clover	Rarely
<i>Dalea villosa</i> var. <i>villosa</i>	silky prairie clover	Occasional
<i>Cystopteris fragilis</i>	fragile fern	Infrequent

Scientific Name	Common Name	Frequency Encountered
<i>Dicanthelium oligosanthes</i>	Scribner's panic grass	Occasional
<i>Diervilla lonicera</i>	bush honeysuckle	Occasional
<i>Dioscorea villosa</i>	wild yam	Infrequent
<i>Eragrostis spectabilis</i>	purple lovegrass	occasional
<i>Erechtites hieraciifolius</i> var. <i>hieraciifolius</i>	pilewort	Infrequent
<i>Erigeron annuus</i>	annual fleabane	Rarely
<i>Erigeron strigosus</i>	daisy fleabane	Rarely
<i>Euphorbia esula</i>	leafy spurge	Abundant
<i>Euphorbia glyptosperma</i>	ridge-seeded spurge	Rarely
<i>Euphorbia maculata</i>	prostrate hairy spurge	Rarely
<i>Euthamia graminifolia</i>	grass-leaved goldenrod	Infrequent
<i>Fallopia scandens</i>	false buckwheat	Occasional
<i>Fragaria virginiana</i>	common strawberry	Few
<i>Fraxinus pennsylvanica</i>	green ash	Rarely
<i>Geranium carolinianum</i>	Carolina cranesbill	Rarely
<i>Hackelia virginiana</i>	Virginia stickseed	Occasional
<i>Hedeoma hispida</i>	mock pennyroyal	rarely
<i>Helianthemum bicknellii</i>	hoary frostweed	Rarely
<i>Helianthus annuus</i>	common sunflower	Rarely
<i>Heterotheca villosa</i>	hairy golden aster	Occasional
<i>Impatiens capensis</i>	spotted touch-me-not	Infrequent
<i>Juniperus virginiana</i> var. <i>virginiana</i>	eastern red cedar	Abundant
<i>Kochia scoparia</i> subsp. <i>scoparia</i>	summer cypress	Rarely
<i>Koeleria macrantha</i>	junegrass	Occasional
<i>Lechea stricta</i>	prairie pinweed	Rarely
<i>Lespedeza capitata</i>	round-headed bushclover	Rarely
<i>Liatris aspera</i>	rough blazing star	Rarely
<i>Lithospermum canescens</i>	hoary puccoon	Occasional
<i>Lonicera tatarica</i>	tartarian honeysuckle	Abundant
<i>Lotus corniculatus</i>	bird's-foot trefoil	Rarely
<i>Maianthemum stellatum</i>	starry false Solomon's seal	Rarely
<i>Mollugo verticillata</i>	carpetweed	Rarely
<i>Monarda fistulosa</i>	wild bergamot	Rarely
<i>Morus alba</i>	white mulberry	Occasional
<i>Muhlenbergia mexicana</i>	Mexican muhly grass	Occasional
<i>Muhlenbergia racemosa</i>	marsh muhly grass	Occasional
<i>Nepeta cataria</i>	catnip	Rarely
<i>Panicum virgatum</i>	switchgrass	Occasional
<i>Parthenocissus vitacea</i>	woodbine	Occasional
<i>Pascopyrum smithii</i>	western wheatgrass	Occasional
<i>Penstemon grandiflorus</i>	large-flowered beard tongue	Rarely
<i>Physalis heterophylla</i> var. <i>heterophylla</i>	clammy ground cherry	Occasional

Scientific Name	Common Name	Frequency Encountered
<i>Populus tremuloides</i>	quaking aspen	Occasional
<i>Potentilla recta</i>	rough-fruited cinquefoil	Occasional
<i>Prunus americana</i>	wild plum	Rarely
<i>Prunus virginiana</i>	chokecherry	Abundant
<i>Quercus ellipsoidalis</i>	northern pin oak	Occasional
<i>Quercus macrocarpa</i>	bur oak	Abundant
<i>Rhamnus cathartica</i>	common buckthorn	Occasional
<i>Rhus glabra</i>	common buckthorn	Occasional
<i>Rubus idaeus var. strigosus</i>	red raspberry	Occasional
<i>Rudbeckia hirta var. pucherrima</i>	black-eyed Susan	Rarely
<i>Saponaria officinalis</i>	bouncing bet	Occasional
<i>Sambucus racemosa var. pubens</i>	red-berried elder	Infrequent
<i>Schizachyrium scoparia</i>	little bluestem	infrequent
<i>Scutellaria leonardii</i>	Leonard's skullcap	Rarely
<i>Setaria pumila subsp. pumila</i>	yellow foxtail	Occasional
<i>Silene nivea</i>	snowy campion	Occasional
<i>Smilax lasioneura</i>	common carrion flower	Rarely
<i>Solidago canadensis</i>	Canada goldenrod	Occasional
<i>Solidago gigantea</i>	giant goldenrod	Occasional
<i>Solidago nemoralis</i>	gray goldenrod	Rarely
<i>Sorghastrum nutans</i>	Indian grass	Rarely
<i>Spartina pectinata</i>	prairie cordgrass	Rarely
<i>Spiraea tomentosa var. rosea</i>	steeplebush	Rarely
<i>Sporobolus cryptandrus</i>	sand dropseed	Rarely
<i>Symphyotrichum ericoides</i>	heath aster	Rarely
<i>Symphyotrichum oolentangiense</i>	skyblue aster	Infrequent
<i>Toxicodendron radicans subsp. negundo</i>	common poison ivy	Infrequent
<i>Trifolium repens</i>	white clover	Rarely
<i>Ulmus pumila</i>	Siberian elm	Infrequent
<i>Verbascum thapsus</i>	common mullein	Occasional
<i>Verbena hastata</i>	blue vervain	Infrequent
<i>Viola palmata</i>	bird's-foot violet	Rarely
<i>Vitis riparia</i>	wild grape	Infrequent
<i>Zanthoxylum americanum</i>	prickly ash	Rarely

Appendix B Representative Photos

For select photos as noted in captions.



Photo 1 – Portion of the site with sandy soils dominated by native grasses and sedges. Looking southeast (photo taken 9/26/25).



**Photo 2 – Another portion of the site with sandy soils dominated by native grasses and forbs.
(photo taken 9/26/25).**



**Photo 3 – Area searched for rare species showing sandy substrate, native grasses and forbs.
(photo taken 9/26/24)**



Photo 4 – Area maintained as transmission line (photo taken 9/26/25)



Photo 5 – Portion of site adjacent to transmission station searched for rare species (photo taken 9/26/25)



Photo 6 – Open area searched for target species adjacent to forest/woodland edge. (Photo taken 9/26/25)



Photo 7 – Portion of the site showing wooded communities present on the site. No rare species were observed at this location. 9/26/25



Photo 8 – Area on site exhibiting exposed sandy soils (photo taken on 9/26/2025).



Photo 9 – Another portion of the site exhibiting native grassland community. Looking south (photo taken 9/26/2025).



**Photo 10 – Plant community structure under transmission line on southern half of the site.
Looking east (photo taken on 9/26/2025).**



Photo 11 - Plant community structure on southern half of the Project. Looking west (photo taken on 9/26/2025).

Certificate of Service

IN THE MATTER OF THE APPLICATION OF NORTHERN STATES POWER COMPANY D/B/A XCEL ENERGY FOR AN UP TO 135.5 MW BATTERY ENERGY STORAGE SYSTEM SITE PERMIT FOR THE BLUE LAKE BATTERY ENERGY STORAGE PROJECT IN SCOTT COUNTY, MINNESOTA

DOCKET NO. E002/ESS-25-214

Stephanie Mayers certifies that on the 19th day of December, 2025, she e-filed on behalf of Northern States Power Company, doing business as Xcel Energy true and correct copies of the following documents:

1. Direct Testimony of Tyler S. Beemer
2. Certificate of Service.

A copy has also been served on the individuals listed on the attached official service lists of record.

Executed on: December 19, 2025

Signed: /s/ Stephanie Mayers

401 Nicollet Mall

Minneapolis, MN 55401

#	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	25-214 Official CC Service List
2	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	25-214 Official CC Service List
3	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	25-214 Official CC Service List
4	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	25-214 Official CC Service List
5	Jordan	Clitty	jordan.r.clitty@xcelenergy.com	Northern States Power Company dba Xcel Energy-Elec		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	25-214 Official CC Service List
6	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St, Louis MO, 63119-2044 United States	Electronic Service		No	25-214 Official CC Service List
7	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	25-214 Official CC Service List
8	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	25-214 Official CC Service List
9	Martin	Donovan	martin.donovan@state.mn.us		Department of Natural Resources	500 Lafayette Road St Paul MN, 55155 United States	Electronic Service		No	25-214 Official CC Service List
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11	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	25-214 Official CC Service List
12	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	25-214 Official CC Service List
13	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	25-214 Official CC Service List

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15	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	25-214 Official CC Service List
16	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	25-214 Official CC Service List
17	Sarah	Johnson Phillips	sphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	25-214 Official CC Service List
18	Richard	Kolodziejewski	rkolodziejewski@ncsrcc.org	North Central States Regional Council of Carpenters		700 Olive St St. Paul MN, 55130 United States	Electronic Service		No	25-214 Official CC Service List
19	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	25-214 Official CC Service List
20	Alicia	LaValla	alavalla@fredlaw.com	Fredrikson & Byron, P.A.		60 South Sixth St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	25-214 Official CC Service List
21	Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	25-214 Official CC Service List
22	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	25-214 Official CC Service List
23	Megan	McKenzie	megan.mckenzie@state.mn.us		Office of Administrative Hearings	PO Box 64620 St Paul MN, 55164 United States	Electronic Service		Yes	25-214 Official CC Service List
24	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	25-214 Official CC Service List
25	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	25-214 Official CC Service List
26	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis	Electronic Service		No	25-214 Official CC

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28	Carol A.	Overland	overland@legalectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	25-214 Official CC Service List
29	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	25-214 Official CC Service List
30	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	25-214 Official CC Service List
31	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	25-214 Official CC Service List
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37	Carla	Vita	carla.vita@state.mn.us	MN DEED		Great Northern Building 12th Floor 180 East Fifth Street St. Paul MN, 55101 United States	Electronic Service		No	25-214 Official CC Service List
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2	Water Programs	Coordinator	waterprograms.bwsr@state.mn.us		Minnesota Board of Water and Soil Resources	520 Lafayette Road N St. Paul MN, 55155 United States	Electronic Service		No	Agency Reps
3	Kate	Fairman	kate.fairman@state.mn.us		Department of Natural Resources	Box 32 500 Lafayette Rd St. Paul MN, 55155-4032 United States	Electronic Service		No	Agency Reps
4	Chris	Green	chris.green@state.mn.us	Minnesota Pollution Control Agency		504 Fairgrounds Rd Suite 200 Marshall MN, 56258 United States	Electronic Service		No	Agency Reps
5	Dean	Hunter	dean.hunter@state.mn.us		Minnesota Department of Labor & Industry	443 Lafayette Rd N St. Paul MN, 55155-4341 United States	Electronic Service		No	Agency Reps
6	Chad	Konickson	chad.konickson@usace.army.mil	U.S.Army Corps of Engineers		332 Minnesota St. Suite E1500 Saint Paul MN, 55101 United States	Electronic Service		No	Agency Reps
7	Stacy	Kotch Egstad	stacy.kotch@state.mn.us		MINNESOTA DEPARTMENT OF TRANSPORTATION	395 John Ireland Blvd. St. Paul MN, 55155 United States	Electronic Service		No	Agency Reps
8	General	Mail	twincities@fws.gov				Electronic Service		No	Agency Reps
9	Stephan	Roos	stephan.roos@state.mn.us		Minnesota Department of Agriculture	625 Robert St N Saint Paul MN, 55155-2538 United States	Electronic Service		No	Agency Reps
10	Jayme	Trusty	execdir@swrdc.org	SWRDC		2401 Broadway Ave #1 Slayton MN, 56172 United States	Electronic Service		No	Agency Reps
11	Isaac	Weston	isaac.weston@state.mn.us			null null, null United States	Electronic Service		No	Agency Reps
12	Alan	Whipple	sa.property@state.mn.us		Minnesota Department Of Revenue	Property Tax Division 600 N. Robert Street St. Paul MN, 55146-3340 United States	Electronic Service		No	Agency Reps
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26	Kyle	Fairbanks	kyle.fairbanks@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	Tribal Government Contacts
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28	Leonard	Fineday	leonard.fineday@llojibwe.net	Leech Lake Bank of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	Tribal Government Contacts
29	Henry	Fox	henry.fox@whiteearth-nsn.gov	White Earth Nation		PO Box 418 White Earth MN, 56569 United States	Electronic Service		No	Tribal Government Contacts
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42	Miranda	Lilya	mlilya@boisforte-nsn.gov	Bois Forte Band of Chippewa		5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	Tribal Government Contacts
43	Charles	Lippert	charlie.lippert@millelacsband.com			43408 Oodena Dr Onamia MN, 56359 United States	Electronic Service		No	Tribal Government Contacts
44	Vernelle	Lussier	vernelle.lussier@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	Tribal Government Contacts

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48	Wendy	Merrill	wendy.merrill@millelacsband.com	Mille Lacs Band of Ojibwe		null null, null United States	Electronic Service		No	Tribal Government Contacts
49	Valentina	Mgeni	valentina.mgeni@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	Tribal Government Contacts
50	Cole W.	Miller	cole.miller@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	Tribal Government Contacts
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55	Earl	Otis	earlotis@fdlband.org	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	Tribal Government Contacts
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60	Gov	Relations	govt.relations@llojibwe.net	Leech Lake Band of Ojibwe		null null, null United States	Electronic Service		No	Tribal Government Contacts
61	Bill	Rudnicki	bill.rudnicki@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	Tribal Government Contacts
62	Miranda	Sam	miranda.sam@lowersioux.com	Lower Sioux Indian Community		39527 Reservation Highway 1 PO Box 308 Morton MN, 56270 United States	Electronic Service		No	Tribal Government Contacts
63	Bruce	Savage	brucesavage@fdlband.org	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	Tribal Government Contacts
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66	Darrell	Seki, Sr.	dseki@redlakenation.org			15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	Tribal Government Contacts
67	Joel	Smith	jsmith@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 56633 United States	Electronic Service		No	Tribal Government Contacts
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75	Craig	Tangren	craig.tangren@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	Tribal Government Contacts
76	Camille	Tanhoff	kamip@upperSiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO BOX 147 Granite Falls MN, 56241 United States	Electronic Service		No	Tribal Government Contacts
77	Bill	Thompson	billthompson@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	Tribal Government Contacts
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