

November 21, 2023

**VIA EDOCKETS**

Mr. Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 Seventh Place East, Suite 350  
Saint Paul, MN 55101-2147

Re: **Reply Comments**  
**In the Matter of the Application of Lake Wilson Solar Energy LLC for a Certificate of Need for the up to 150 MW Lake Wilson Solar and Associated Battery Storage Project in Murray County, Minnesota**

**MPUC Docket No. IP-7070/CN-21-791**  
**OAH Docket Number: 5-2500-39336**

Dear Mr. Seuffert:

Lake Wilson Solar Energy LLC (“Lake Wilson Solar”) has reviewed the comments filed by the Minnesota Department of Commerce, Division of Energy Resources (“Department”) on November 9, 2023, recommending approval of Lake Wilson’s request for a certain certificate of need for the up to 150-megawatt Lake Wilson Solar and Associated Battery Storage Project located in Murray County, Minnesota (the “Project”) if the Commission finds, after consideration of the Environmental Report, that the proposed facility will provide benefits to society in a manner compatible with protecting the natural and socioeconomic environments, including human health.<sup>1</sup> Comments in support of the Project were also filed by LIUNA Minnesota and North Dakota (“LIUNA”)<sup>2</sup> and International Union of Operating Engineers Local 49 and North Central States Regional Council of Carpenters (“IUOE Local 49 and Council of Carpenters”).<sup>3</sup> Lake Wilson Solar appreciates the supportive comments of both LIUNA and IUOE Local 49 and Council of Carpenters.

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<sup>1</sup> Comments and Recommendation of the Minnesota Department of Commerce, Division of Energy Resources on the Merits of a Certificate of Need Filing (November 9, 2023), Docket No. 202311-200384-02 (Public).

<sup>2</sup> LIUNA Minnesota / North Dakota Comments regarding Merits of Certificate of Need Filing (November 6, 2023) Docket No. 202311-200296-01.

<sup>3</sup> IUOE Local 49 and NCSRC of Carpenter Comments regarding Merits of Certificate of Need Filing (November 6, 2023) Docket No. 202311-200266-01.

The Minnesota Department of Commerce Energy Environmental Review Analysis unit completed a combined Environmental Report and Environmental Assessment (“EA”) on October 16, 2023.<sup>4</sup> The EA found impacts from the construction and the operation of the Project are expected to be minimal to moderate, except for potential noise impacts during construction which the EA found may be minimal to significant depending on the activity. Accordingly, the Project will be compatible with protecting the natural and socioeconomic environments, including human health. Accordingly, Lake Wilson Solar agrees with the Department’s recommendations and requests that the Commission grant a certificate of need to Lake Wilson Solar for the Project.

A copy of this filing has also been served upon the persons on the attached Certificate of Service. 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

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Enclosures

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<sup>4</sup> Environmental Assessment, Lake Wilson Solar Energy Center Project (October 16, 2023), Docket Nos. 202310-199721-01, 202310-199721-03, 202310-199721-05, 202310-199721-07, 202310-199721-09, 202310-199721-10, 202310-199721-11, 202310-199721-13, 202310-199721-15, 202310-199721-17, 202310-199721-19, 202310-199725-02, 202310-199725-04, 202310-199725-06, 202310-199725-08, 202310-199725-10, 202310-199725-12, 202310-199725-14.

**In the Matter of the Application of Lake  
Wilson Solar Energy LLC for a  
Certificate of Need for the up to 150 MW  
Lake Wilson Solar and Associated Battery  
Storage Project in Murray County,  
Minnesota**

**MPUC Docket No. IP-7070/CN-21-791  
OAH Docket Number: 5-2500-39336**

**CERTIFICATE OF SERVICE**

Breann L. Jurek certifies that on the 21st day of November 2023, on behalf of Lake Wilson Solar Energy LLC, she e-filed true and correct copies of the following documents:

1. Reply Comments; and
2. Certificate of Service,

with the Minnesota Public Utilities Commission via eDockets ([www.edockets.state.mn.us](http://www.edockets.state.mn.us)). Said documents were also served on the Official Service List of record on file with the Minnesota Public Utilities Commission and as attached hereto.

Executed on: November 21, 2023

*Signed: /s/ Breann L. Jurek*

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Fredrikson & Byron, P.A.  
60 South Sixth Street  
Suite 1500  
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Lisa	Agrimonti	lagrimonti@fredlaw.com	Fredrikson & Byron, P.A.	60 South Sixth Street Suite 1500 Minneapolis, MN 55402-4400	Electronic Service	Yes	OFF_SL_21-791_Official CC Service List
Sarah	Beimers	sarah.beimers@state.mn.us	Department of Administration - State Historic Preservation Office	50 Sherburne Avenue Suite 203 St. Paul, MN 55155	Electronic Service	No	OFF_SL_21-791_Official CC Service List
David	Bell	david.bell@state.mn.us	Department of Health	POB 64975  St. Paul, MN 55164	Electronic Service	No	OFF_SL_21-791_Official CC Service List
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-791_Official CC Service List
Mark D	Crowl	MCrowl@invenenergy.com	Invenenergy, LLC	1401 17th St Ste 1100  Denver, CO 80202	Electronic Service	Yes	OFF_SL_21-791_Official CC Service List
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Jeremy	Duehr	jduehr@fredlaw.com	Fredrikson & Byron, P.A.	60 S Sixth St Ste 1500  Minneapolis, MN 55402-4400	Electronic Service	Yes	OFF_SL_21-791_Official CC Service List
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Chad	Konickson	chad.konickson@usace.ar my.mil	U.S.Army Corps of Engineers	180 5th St # 700  Saint Paul, MN 55101	Electronic Service	No	OFF_SL_21-791_Official CC Service List

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Dawn S	Marsh	dawn_marsh@fws.gov	U.S. Fish & Wildlife Service	Minnesota-Wisconsin Field Offices 4101 American Blvd E Bloomington, MN 55425	Electronic Service	No	OFF_SL_21-791_Official CC Service List
James	Mortenson	james.mortenson@state.mn.us	Office of Administrative Hearings	PO BOX 64620  St. Paul, MN 55164-0620	Electronic Service	Yes	OFF_SL_21-791_Official CC Service List
Jenna	Ness	jenna.ness@state.mn.us	Department of Commerce	85 7th place east  St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-791_Official CC Service List
Cezar	Panait	Cezar.Panait@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-791_Official CC Service List
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-791_Official CC Service List
Stephan	Roos	stephan.roos@state.mn.us	MN Department of Agriculture	625 Robert St N  Saint Paul, MN 55155-2538	Electronic Service	No	OFF_SL_21-791_Official CC Service List
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Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources	500 Lafayette Road Box 25 St. Paul, MN 55155-4040	Electronic Service	No	OFF_SL_21-791_Official CC Service List
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