

October 4, 2019

Executive Secretary Daniel P. Wolf  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East  
Suite 350  
Saint Paul, MN 55101-2147

RE: Department of Commerce Working Group on Decommissioning of Wind and Solar Facilities  
Public Utilities Commission Docket Number: E-999/M-17-123

Dear Secretary Wolf:

On behalf of Commissioner Petersen, Minnesota Department of Agriculture (MDA) appreciates the opportunity to provide comment on the Working Group Decommissioning Report and the Department of Commerce Energy Environmental Review & Analysis' (DOC EERA) Comments and Recommendations. I have reviewed these documents and offer the following comments and recommendations on the planning, review, permitting, and implementation of decommissioning projects for solar and wind energy facilities.

As most utility scale solar and wind energy facilities are located within agricultural regions of Minnesota, there is a requirement that project proposers develop an Agricultural Impact Mitigation Plan (AIMP) as part of the permitting process. Currently, AIMPs do contain a section that describes the goals of and approach to decommissioning the facility, however, unlike the sections related to construction of the facility, this section has always been brief and general in nature. MDA fully supports the proposed requirement for a detailed and complete decommissioning plan, updated at appropriate intervals, and fully funded by the end-of-life for the facility.

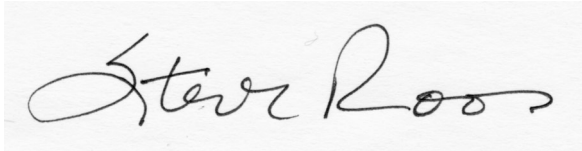
Since agricultural regions of Minnesota contain a complex mix of productive lands and environmentally sensitive areas, MDA recommends that successful decommissioning requires coordination with all relevant state agencies. For example, it has become clear with existing facilities that, once removed from agricultural production, certain areas will revert to pre-agriculture conditions, e.g., wetlands. Decommissioning such areas could require permits and oversight significantly different than those required during construction and involve coordination with multiple agencies.

The potential for site disturbances is just as likely during decommissioning activities as during construction. Removal of site infrastructure could lead to impacts such as soil compaction, mixing of

soil horizons, damaged drainage networks, among others. MDA believes that careful assessment of prevailing conditions at the time of decommissioning will dictate appropriate approaches to infrastructure removal and the need for careful monitoring of the process. MDA recommends that plans include a requirement for third party monitors that report directly to state agencies much the same as during the construction phases of the facility.

Thank you for the opportunity to submit this review of the Working Group Decommissioning Report and the DOC EERA Comments and Recommendations. If you have any questions about MDA's comments please feel free to contact me.

Sincerely,

A handwritten signature in black ink on a light-colored background. The signature reads "Stephan Roos" in a cursive, flowing script.

Stephan Roos  
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cc: Commissioner Thom Petersen, MDA  
Bob Patton, MDA  
Tricia DeBleeckere, Minnesota Public Utilities Commission  
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