APPENDIX N
Size Determination

COMMERCE DEPARTMENT

Solar Energy Generating System

Size Determination Form

Minnesota Statute § 216E.021 requires combining proposed solar energy generating systems for permitting purposes when certain conditions exist. The Department of Commerce requires the information requested below to determine 1) whether proposed solar energy generating systems meet the definition of a large electric power generating plant and, therefore, are subject to the Public Utilities Commission's siting authority; or 2) whether large electric power generating plants that are solar energy generating systems should be combined for permitting purposes. Based on the information provided, Commerce staff may require additional information to make a determination.

Instructions: Answer each question completely. Each question and answer must be clearly identified. Attach maps and supporting information as necessary. Return the signed and dated information to:

Ray Kirsch
Minnesota Department of Commerce
85 Seventh Place East, Suite 280
Saint Paul, MN 55101-2198

Phone: (651) 539-1841
Fax: (651) 539-0109
Email: *raymond.kirsch@state.mn.us*

Note: This form can be made available electronically, and submitted as an electronic document.

A. Project Description

Briefly describe the proposed project or projects, including name(s); need for the project(s); number of solar energy generating systems; alternating current nameplate capacity of the individual solar energy generating systems identified; and the combined alternating current nameplate capacity.

Castle Rock Solar LLC ("Castle Rock Solar"), a Delaware limited liability company and wholly-owned indirect subsidiary of Midcontinental Renewables LLC, proposes an up to 150[1] megawatt ("MW") alternating current ("AC") photovoltaic ("PV") solar-energy generating system at a single-site in Dakota County, Minnesota (the "Project") as indicated in the attached Figure 1. Castle Rock Solar will be submitting an application to the Minnesota Public Utilities Commission ("PUC") for up to 150 MW AC of nameplate solar energy capacity.

The approved interconnection capacity for 150 MW solar will come from a single interconnection request as one combined facility.

[1] The Project capacity of up to 150 MW AC is based on the maximum, alternating current, power injection capacity of the facility that will be defined in the Generator Interconnection Agreement.

Construction of the solar energy generation components of the Project is expected to occur in one continuous process. Additionally, Castle Rock Solar intends to finance the Project's construction as a single project while also marketing the power generated by the facility for a single off-taker.

The Project will be located in Dakota County, and the Project area (i.e., land under lease, option, or easement) spans approximately 1,355 acres, with the anticipated project footprint being approximately 928 acres in Castle Rock Township, Dakota County (Figure 1). The Project proposes to interconnect to the existing Chub Lake to Hampton 345 kilovolt (kV) transmission line, which transects the Project.

The Project is necessary to meet the growing demand for additional renewable resources required to meet the Renewable Energy Standard and carbon reduction goals set forth in Minnesota Statutes and other clean energy requirements in Minnesota, neighboring states, and the country at large, including the renewable energy and carbon reduction goals of Northern States Power Company, dba Xcel Energy.

B. Project Design and Location

Provide the following information regarding each solar energy generating system:

B-1. Describe the 1) solar generating equipment and associated facilities; 2) project boundary location(s) (county, township, and sections); 3) the area within the project boundary (acres); and 4) area within the project boundary that will be developed for the solar project (acres).

The Project's permanent facilities may include:

- Solar modules, inverters, and racking;
- On-site buried electrical collection lines;
- A Project substation including one or more step-up power transformers;
- An overhead transmission line (gen-tie) less than 1,500 feet long;
- Fencing;
- Access roads;
- An Operations and Maintenance (O&M) building; and
- Ancillary equipment and buildings as necessary.

The Project is planned in the following sections in Dakota County, Minnesota:

Township	Range	Section
113 North	19 West	2, 3, 4, 9, 10

The Project area includes approximately 1,355 acres in total under lease, easement or purchase option (the "Project Area").[2] The anticipated Project footprint is expected to be approximately 928 acres (the "Preliminary Development Area"). Castle Rock Solar continues to analyze the optimal design layout within the Project Area, and the exact acres utilized will depend on final design. Areas are subject to applicable setbacks and public rights-of-way. A figure showing the Project Area and the Preliminary Development Area (i.e., Project footprint) is attached to this form as Figure 1.

B-2. Describe the anticipated point of electrical interconnection. Describe interconnection requests and the status of each request. Provide any assigned project or queue interconnection numbers.

The Project will interconnect at a new switchyard to be permitted, constructed, owned and operated by Northern States Power Company, doing business as Xcel Energy, on the existing Chub Lake to Hampton345 kV line in Dakota County, MN.

The Project has one interconnection request for the solar facilities in the 2021 MISO Queue **[NONPUBLIC DATA BEGINS…** [redacted] **NONPUBLIC DATA ENDS]** for 150 MW of solar generation. This interconnection request was part of MISO's West DPP-2021 study group, which began in Q4 2021.

In accordance with Minnesota Rules, part 7829.0500, Minn. Stat. Ch. 13 and the Commission's standard procedures, Castle Rock Solar has designated as trade secret certain commercially-sensitive information, i.e., MISO queue information, which is considered confidential and proprietary trade secret information, provided to answer the questions posed in this form. Release of this data would have a detrimental effect on Castle Rock Solar by providing potential competitors and others with valuable information not otherwise readily ascertainable and from which these persons would obtain economic value.

B-3. Provide a map showing the proposed facility boundary, the interconnection site, anticipated solar module layout, and associated facilities. "Associated facilities" includes access roads, operation and maintenance facilities, collector and feeder lines, and substations. Maps should be at 1:24,000 scale using an imagery basemap. The map must include a legend and scale bar.

The attached Figure 1 shows the Project Area, Preliminary Development Area footprint, and point of interconnection for the proposed solar project. While initial Project design and layout has been initiated, further revisions may occur as the Project advances towards filing.

C. Project Characteristics

[2] At present, some land under lease or purchase option will not be utilized for the Project due to design considerations.

Provide the following information regarding each solar energy generating system:

C-1. List and describe the entity responsible for constructing the project.

Castle Rock Solar will be responsible for constructing the Project. Castle Rock Solar has not yet selected a construction contractor for the Project.

C-2. List and describe the entity responsible for operating and maintaining the project.

Castle Rock Solar will be responsible for operating and maintaining the Project.

C-3. Describe the ownership structure, sales agreement(s), interconnection(s), revenue sharing, debt or equity financing, and any other characteristics of the solar energy generating system. Include a statement indicating whether these characteristics are "independent" or "shared." If shared, indicate with what existing or proposed project.

Castle Rock Solar is an independent power producer that was formed to own, construct and operate the Project. Castle Rock Solar is a Delaware limited liability company and wholly-owned indirect subsidiary of Midcontinental Renewables LLC. Castle Rock Solar will continue to own, operate and construct the Project after construction. The Project's solar queue position includes only enough capacity to serve the Project. Accordingly, the Project will not share interconnection with any other project. Castle Rock Solar does not currently have or anticipate sharing revenue, debt or equity financing with any other project.

C-4. Provide the anticipated schedule for completion, including dates for permitting, construction (start and end dates), and commercial operation.

Castle Rock Solar plans to file a Site Permit Application in the third quarter of 2024 so that it receives Commission approval for the Project by the summer of 2025. Construction may begin as early as the fall of 2025 with commercial operation expected by the end of 2026 or early 2027.

D. Applicant Information

D-1. Provide the name, address, email, and telephone number of the applicant and any authorized representative.

Derek Hasek
Chief Development Officer
3316 Highland Ave
Wayzata, MN 55391
Phone: 612-655-5807
Email: derek.hasek@solarstonepartners.com

Website: www.solarstonepartners.com

Jeremy Duehr
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60 South Sixth Street, Suite 1500
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Direct: 612.492.7413
jduehr@fredlaw.com

D-2. Provide the name, address, e-mail, and telephone number of the person or persons who would prepare the application to the Public Utilities Commission or to a Minnesota county or local unit of government, if such an application would be prepared by an agent or consultant of the applicant.

Jennifer Kamm, CWD
Associate, Project Manager
Senior Environmental Scientist

Phone: (cell) 612-357-2309
(Direct) 763-252-6814
Jennifer.Kamm@stantec.com

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One Carlson Parkway, Suite 100
Plymouth, MN 55447

D-3. Briefly describe the applicant's business entity including its ownership and financial structure.

Castle Rock Solar was formed for the purpose of developing this Project. Castle Rock Solar is a Delaware limited liability company and wholly-owned indirect subsidiary of Midcontinental Renewables LLC, a joint development partnership between Matrix Renewables, a renewable energy company funded by TPG's impact investing platform, and SolarStone, a leading renewable energy company based in Minnesota.

D-4. Provide the Minnesota Secretary of State organizational ID number for the applicant business entity, all subordinate entities, and all solar developer entities involved with the project.

Castle Rock Solar's Minnesota Secretary of State organizational identification number is 1239998800028. Castle Rock Solar does not have any subordinate entities. Castle Rock Solar is a is wholly owned indirect subsidiary of Midcontinental Renewables LLC.

D-5. Identify and provide contact information for the person or persons who would be the permittees, if different than the applicant, if the solar energy generating systems were permitted by the Public Utilities Commission or a Minnesota county.

The permittee is Castle Rock Solar LLC, who is also the applicant.

Representatives:

Derek Hasek
Chief Development Officer
3316 Highland Ave
Wayzata, MN 55391
Phone: 612-655-5807
Email: derek.hasek@solarstonepartners.com
Website: www.solarstonepartners.com

E. Other Projects in Minnesota

E-1. Identify any planned or existing solar energy generating system(s) in Minnesota in which the applicant, or a principal, partner, or affiliate of the applicant, has an ownership or other financial interest. Describe any facilities identified, including their location, alternating current nameplate capacity, and their interconnection requests.

Castle Rock Solar LLC does not have any ownership or financial interest in any planned or operational solar facilities in Minnesota. However, Midcontinental Renewables LLC has ownership and financial interests in the following project(s) currently under development in Minnesota.

[NONPUBLIC DATA BEGINS… [redacted]

[redacted]

[redacted]

NONPUBLIC DATA ENDS]

E-2. Identify any additional solar energy generating system(s) in Minnesota in which the applicant, or principal, partner, or affiliate of the applicant, has an ownership or other financial interest and is currently under construction or construction is planned to begin within 12 months of the proposed project(s) estimated completion date. Describe any facilities identified, including their location, alternating current nameplate capacity, and their interconnection requests.

None.

E-3. Identify any planned or existing solar energy generating system(s) in Minnesota which that shares any of the following with the proposed project: power purchase agreement, interconnection, sales, revenues, debt or equity financing, or other ownership or financial interests. Describe any facilities identified, including their location, alternating current nameplate capacity, and their interconnection requests.

None.

COMMERCE DEPARTMENT

August 19, 2024

Derek Hasek
SolarStone Partners
3316 Highland Ave
Wayzata, MN 55391

Dear Mr. Hasek,

Thank you for submitting a solar size determination request for Castle Rock Solar LLC's proposed 150 megawatt (MW) Castle Rock solar project in Dakota County.

The Department is responsible for reviewing such requests to determine whether a combination of solar energy generating systems meets the definition of large electric power generating plant such that a proposed project is subject to the siting authority of the Minnesota Public Utilities Commission (Commission).

Based on information provided by Castle Rock Solar LLC, and based on criteria established in Minn. Statute 216E.021, the Department has determined that the Castle Rock solar project is not associated with other planned solar projects in a way that would require them to be combined into a single project. However, given that the project on its own has a generating capacity of up to 150 MW, the Department determines that the project is subject to the Commission's siting authority and must submit an application for a site permit under the Power Plant Siting Act (Minnesota Statute 216E).

Per Minn. Statute 216E.021, Castle Rock Solar, LLC has the right to dispute this determination with the Chair of the Commission.

Please contact me with any questions.

Sincerely,

Ray Kirsch
Energy Environmental Review and Analysis

cc: Bret Eknes, Public Utilities Commission