

Appendix C

Coneflower Solar Responses to Data Requests

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Energy Environmental Review and Analysis

Questions for Development of Environmental Assessment

In the Matter of the Applications of Coneflower Energy, LLC for a Site Permit for the up to 235 MW
Coneflower Solar Project in Lyon County, Minnesota

PUC Docket No. IP7132/GS-24-215 Directed To: Brie Anderson

EERA Question No. 1 Please Respond By: March 7, 2025

Note: Energy Environmental Review and Analysis staff intends to use information provided in this response to develop an environmental review document and is a public document. Responses to these questions will be considered to be public information unless otherwise designated by the respondent as nonpublic information pursuant to Minnesota Stat. § 13.02.

Question(s):

Panel Glare:

Please describe the glare that will be generated by project solar panels.

Lauren Agnew

March 7, 2025

Environmental Review Manager

Date

MN Department of Commerce

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Coneflower Energy, LLC

Response to Energy Environmental Review and Analysis (EERA) Questions for Development of Environmental Assessment

In the Matter of the Application of Coneflower Energy, LLC for a Site Permit for the Coneflower Solar Project in
Lyon County, Minnesota

PUC Docket No.	IP7132/GS-24-215	Directed To:	Lauren Agnew
EERA Question No.	1	Date of Response:	March 14, 2025
Public		Nonpublic	

Note: Energy Environmental Review and Analysis staff intends to use information provided in this response to develop an environmental review document and is a public document. Responses to these questions will be considered to be public information unless otherwise designated by the respondent as nonpublic information pursuant to Minnesota Stat. § 13.02.

Question(s):

Panel Glare:

Please describe the glare that will be generated by project solar panels.

Response:

Modern-day solar modules come equipped with anti-reflection coatings (ARCs). This coating is very similar to the type we have on our eyeglasses. It applies 'destructive interference', canceling out the light waves reflected by the top surface of the module and the light waves reflected from the solar cell surface, which are a few millimeters past the top surface of the module. This reduces glare by 99%.

Name of Responder: Brie Anderson

Date: March 14, 2025

Title: Senior Director of Project Permitting

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Energy Environmental Review and Analysis

Questions for Development of Environmental Assessment

In the Matter of the Applications of Coneflower Energy, LLC for a Site Permit for the up to 235 MW
Coneflower Solar Project in Lyon County, Minnesota

PUC Docket No. IP7132/GS-24-215

Directed To: Brie Anderson

EERA Question No. 2

Please Respond By: March 7, 2025

Note: Energy Environmental Review and Analysis staff intends to use information provided in this response to develop an environmental review document and is a public document. Responses to these questions will be considered to be public information unless otherwise designated by the respondent as nonpublic information pursuant to Minnesota Stat. § 13.02.

Question(s):

Distances of Project Components to Residences:

Please provide the distances between the listed project components and the 108 residences within 0.6miles of the project, based on current project design.

Residence ID	Distance to Inverters (feet)	Distance to Substation (feet)	
		MISO Scenario	Garvin Scenario
RE1			
RE2			
RE3			
RE4			
RE5			
RE6			
RE7			

RE8			
RE9			
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RE107			

RE108



Lauren Agnew

March 7, 2025

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EERA Question No.	2	Date of Response:	March 14, 2025
Public		Nonpublic	

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Question(s):

Distances of Project Components to Residences:

Please provide the distances between the listed project components and the 108 residences within 0.6miles of the project, based on current project design.

Response:

[Distances provided in Appendix E of the EA.](#)

Name of Responder: Brie Anderson

Date: March 14, 2025

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PUC Docket No.	IP7132/GS-24-215	Directed To:	Brie Anderson
EERA Question No.	3	Please Respond By:	March 7, 2025

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Question(s):

Aesthetics:

Please indicate which of the 20 residences adjacent to/within the project the project will be visible at and the extent of visibility.

Lauren Agnew

March 7, 2025

Environmental Review Manager

Date

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EERA Question No.	3	Date of Response:	March 14, 2025
Public		Nonpublic	

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Question(s):

Aesthetics:

Please indicate which of the 20 residences adjacent to/within the project the project will be visible at and the extent of visibility.

Response:

The extent of visibility from each residence to the Project infrastructure will be dynamic and highly variable depending on the observer's location on the property, orientation to the sun, time of day, season of the year (i.e., foliage on trees), weather, air quality, etc. Although the Project infrastructure may be visible from these residences from certain vantage points and under certain conditions, it is Coneflower's commitment to supplement existing vegetative screening to minimize the views from residences to the Project infrastructure and reduce the aesthetic impacts of the Project to the extent practicable, and in coordination with each resident.

Name of Responder: Brie Anderson

Date: March 14, 2025

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PUC Docket No.	IP7132/GS-24-215	Directed To:	Brie Anderson
EERA Question No.	4	Please Respond By:	March 7, 2025

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Question(s):

US 14 Site Access:

In scoping comments, MnDOT indicated that you have committed to combining/shifting all 5 US 14 access roads. Please describe how you have complied with their request, if any access points off US 14 remain, and any additional changes in the site access design you have made.

Lauren Agnew

March 7, 2025

Environmental Review Manager

Date

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EERA Question No.	4	Date of Response:	March 14, 2025
Public		Nonpublic	

Note: Energy Environmental Review and Analysis staff intends to use information provided in this response to develop an environmental review document and is a public document. Responses to these questions will be considered to be public information unless otherwise designated by the respondent as nonpublic information pursuant to Minnesota Stat. § 13.02.

Question(s):

US 14 Site Access:

In scoping comments, MnDOT indicated that you have committed to combining/shifting all 5 US 14 access roads. Please describe how you have complied with their request, if any access points off US 14 remain, and any additional changes in the site access design you have made.

Response:

Coneflower has committed to combining or shifting all five proposed access roads to instead utilize existing access points/field entrances, such that no new accesses or driveways are required off US Highway 14.

Name of Responder: Brie Anderson

Date: March 14, 2025

Title: Senior Director of Project Permitting

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PUC Docket No.	IP7132/GS-24-215	Directed To:	Brie Anderson
EERA Question No.	5	Please Respond By:	March 7, 2025

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Question(s):

Solar Arrays:

Please provide the following details related to the solar panels, arrays, and racking, based on current project design.:

- The number of north-south oriented rows.
- The height of the solar panels when level (at midday).
- The estimated number of single access trackers. I currently state the project will require 20,280 single axis trackers (pulled from the decommissioning plan “Remove Tracking Racking per String” activity) and I want to confirm this is the correct number.

Lauren Agnew

March 7, 2025

Environmental Review Manager

Date

MN Department of Commerce

Coneflower Energy, LLC

Response to Energy Environmental Review and Analysis (EERA) Questions for Development of Environmental Assessment

In the Matter of the Application of Coneflower Energy, LLC for a Site Permit for the Coneflower Solar Project in
Lyon County, Minnesota

PUC Docket No.	IP7132/GS-24-215	Directed To:	Lauren Agnew
EERA Question No.	5	Date of Response:	March 14, 2025
Public		Nonpublic	

Note: Energy Environmental Review and Analysis staff intends to use information provided in this response to develop an environmental review document and is a public document. Responses to these questions will be considered to be public information unless otherwise designated by the respondent as nonpublic information pursuant to Minnesota Stat. § 13.02.

Question(s):

Solar Arrays:

Please provide the following details related to the solar panels, arrays, and racking, based on current project design.:

- The number of north-south oriented rows.
- The height of the solar panels when level (at midday).
- The estimated number of single access trackers.

Response:

- **RESPONSE:** 810 north-south rows, east to west.
- **RESPONSE:** 5 to 8 feet, depending on final technology selection and pile design.
- **RESPONSE:** 7,250 single access trackers. For context, Coneflower notes that 20,280 is the number of strings. There are 27 panels/modules per string. The preliminary design includes 547,560 panels. The number of strings is calculated as the number of panels/modules divided by the number of panels/modules per string. This is $547,560 \text{ panels} / 27 \text{ panels per string} = 20,280 \text{ strings}$.

Name of Responder: Brie Anderson

Date: March 14, 2025

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PUC Docket No.	IP7132/GS-24-215	Directed To:	Brie Anderson
EERA Question No.	6	Please Respond By:	March 7, 2025

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Question(s):

Access Roads:

Please provide the following details regarding access roads, based on current project design:

- The anticipated shoulder width.
- The width of access roads at site entrance points.

Lauren Agnew

March 7, 2025

Environmental Review Manager

Date

MN Department of Commerce

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PUC Docket No.	IP7132/GS-24-215	Directed To:	Lauren Agnew
EERA Question No.	6	Date of Response:	March 14, 2025
Public		Nonpublic	

Note: Energy Environmental Review and Analysis staff intends to use information provided in this response to develop an environmental review document and is a public document. Responses to these questions will be considered to be public information unless otherwise designated by the respondent as nonpublic information pursuant to Minnesota Stat. § 13.02.

Question(s):

Access Roads:

Please provide the following details regarding access roads, based on current project design:

- The anticipated shoulder width.
- The width of access roads at site entrance points.

Response:

- **RESPONSE:** The access roads within the Project Footprint will be at grade and will not have shoulders.
- **RESPONSE:** The width of access roads at site entrances will be approximately 35 feet.

Name of Responder: Brie Anderson

Date: March 14, 2025

Title: Senior Director of Project Permitting

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PUC Docket No.	IP7132/GS-24-215	Directed To:	Brie Anderson
EERA Question No.	7	Please Respond By:	March 7, 2025

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Question(s):

Interconnection Facilities:

Please provide the following details regarding the project's interconnection facilities, based on current project design:

- Substation –
 - An image or schematic of a 34.5/115 kV substation (the MISO Scenario)
 - An image or schematic of a 34.5/345 kV substation (the Garvin Scenario)
 - A description of any differences between the two potential substations in relation to construction, design, components, and operation.
- Switchyard –
 - An image or schematic of a switchyard similar to what would be constructed if the MISO scenario is chosen.
 - A description of the utility-owned switchyard's construction and operation in relation to the project. Will it be constructed concurrently? Will the utility be responsible for O&M tasks?
- Gen-Tie Lines –
 - Anticipated maximum height of the gen-tie line. This is assumed to be the same for both scenarios, please indicate if otherwise.

- Anticipated structure type for the gen-tie line (e.g., steel monopole). This is assumed to be the same for both scenarios, please indicate if otherwise.

Lauren Agnew

March 7, 2025

Environmental Review Manager

Date

MN Department of Commerce

Coneflower Energy, LLC

Response to Energy Environmental Review and Analysis (EERA) Questions for Development of Environmental Assessment

In the Matter of the Application of Coneflower Energy, LLC for a Site Permit for the Coneflower Solar Project in
Lyon County, Minnesota

PUC Docket No.	IP7132/GS-24-215	Directed To:	Lauren Agnew
EERA Question No.	7	Date of Response:	March 14, 2025
Public		Nonpublic	

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Question(s):

Interconnection Facilities:

Please provide the following details regarding the project's interconnection facilities, based on current project design:

- Substation –
 - An image or schematic of a 34.5/115 kV substation (the MISO Scenario)
 - An image or schematic of a 34.5/345 kV substation (the Garvin Scenario)
 - A description of any differences between the two potential substations in relation to construction, design, components, and operation.
- Switchyard –
 - An image or schematic of a switchyard similar to what would be constructed if the MISO scenario is chosen.
 - A description of the utility-owned switchyard's construction and operation in relation to the project. Will it be constructed concurrently? Will the utility be responsible for O&M tasks?
- Gen-Tie Lines –
 - Anticipated maximum height of the gen-tie line. This is assumed to be the same for both scenarios, please indicate if otherwise.

- Anticipated structure type for the gen-tie line (e.g., steel monopole). This is assumed to be the same for both scenarios, please indicate if otherwise.

Response:

- Substation –

- RESPONSE: A plan view of a typical step-up substation (i.e., Project substation) is included as Attachment A. Note that, as described below, the layout and equipment is consistent between the MISO and Garvin Scenarios. The step-up substation in the Garvin Scenario would have a transformer capable of stepping the power up to a higher voltage. Therefore, only one schematic is included. Coneflower also notes that this is for a 34.5/138 kV step-up substation, but conceptually, is similar to the MISO Scenario.
- RESPONSE: A plan view of a typical step-up substation (i.e., Project substation) is included as Attachment A. Note that, as described below, the layout and equipment is consistent between the MISO and Garvin Scenarios. The step-up substation in the Garvin Scenario would have a transformer capable of stepping the power up to a higher voltage. Therefore, only one schematic is included. Coneflower also notes that this is for a 34.5/138 kV step-up substation, but conceptually, is similar to the Garvin Scenario.
- RESPONSE: The construction, design, and operation of the substations would be the same. The only difference between scenarios is the 34.5/345kV substation (Garvin Scenario) would have a larger transformer to step up the power than the 34.5/115kV substation (MISO Scenario).

- Switchyard –

- RESPONSE: A plan view of a typical switching station or switchyard is included in Attachment B.
- RESPONSE: In the MISO Scenario, the switchyard would be constructed concurrently with the Project. As this facility will be owned and operated by the utility (Xcel Energy), they will be responsible for O&M tasks.

- Gen-Tie Lines –

- RESPONSE: There is only a gen-tie line associated with the Garvin Scenario (345 kV line). This line would have structures that range in height from 115 feet to 165 feet above ground, depending on the structure type (dead end, tangent, angle).
- RESPONSE: The gen-tie line associated with the Garvin Scenario would have steel monopole structures.

Name of Responder: Brie Anderson

Date: March 14, 2025

Title: Senior Director of Project Permitting

Energy Environmental Review and Analysis

Questions for Development of Environmental Assessment

In the Matter of the Applications of Coneflower Energy, LLC for a Site Permit for the up to 235 MW
Coneflower Solar Project in Lyon County, Minnesota

PUC Docket No. IP7132/GS-24-215 Directed To: Brie Anderson

EERA Question No. 8 Please Respond By: March 7, 2025

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Question(s):

Weather Stations:

Please provide an image or schematic of a weather station similar to what is anticipated to be installed within the project.

Lauren Agnew

March 7, 2025

Environmental Review Manager

Date

MN Department of Commerce

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In the Matter of the Application of Coneflower Energy, LLC for a Site Permit for the Coneflower Solar Project in
Lyon County, Minnesota

PUC Docket No. IP7132/GS-24-215

Directed To: Lauren Agnew

EERA Question No. 8

Date of Response: March 14, 2025

Public

Nonpublic

Note: Energy Environmental Review and Analysis staff intends to use information provided in this response to develop an environmental review document and is a public document. Responses to these questions will be considered to be public information unless otherwise designated by the respondent as nonpublic information pursuant to Minnesota Stat. § 13.02.

Question(s):

Weather Stations:

Please provide an image or schematic of a weather station similar to what is anticipated to be installed within the project.

Response:



Name of Responder: Brie Anderson

Date: March 14, 2025

Title: Senior Director of Project Permitting

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PUC Docket No.	IP7132/GS-24-215	Directed To:	Brie Anderson
EERA Question No.	9	Please Respond By:	March 7, 2025

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Question(s):

Construction:

Please provide the following details regarding project construction:

- If the construction timeline, anticipated to take 18 months, will be split into two construction seasons.
- An estimate of semi-truck equipment delivery, in trucks/day, during the equipment delivery period(s), the anticipated length of the equipment delivery period(s), and where in the construction timeline the equipment delivery period(s) occurs.
- If any construction phases will require temporary road closures.

Lauren Agnew

March 7, 2025

Environmental Review Manager

Date

MN Department of Commerce

Coneflower Energy, LLC

Response to Energy Environmental Review and Analysis (EERA) Questions for Development of Environmental Assessment

In the Matter of the Application of Coneflower Energy, LLC for a Site Permit for the Coneflower Solar Project in
Lyon County, Minnesota

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EERA Question No.	9	Date of Response:	March 14, 2025
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Question(s):

Construction:

Please provide the following details regarding project construction:

- If the construction timeline, anticipated to take 18 months, will be split into two construction seasons.
- An estimate of semi-truck equipment delivery, in trucks/day, during the equipment delivery period(s), the anticipated length of the equipment delivery period(s), and where in the construction timeline the equipment delivery period(s) occurs.
- If any construction phases will require temporary road closures.

Response:

- Yes, there may be limited construction in the winter (Dec to mid-March) at the Project substation, transmission line (Garvin Scenario), and other electrical.
- RESPONSE:
 - Piles: 500 piles / truck and assume 12 piles per rack = $12 \times 7250 / 500 = 174$ Trucks
 - Racks: 15 racks/truck = $7250 / 15 = 483$ Trucks
 - Panels: 660 panels/truck = $574,560 \text{ panels} / 660 = 871$ Trucks
 - Inverters: 1 truck per inverter = 60 Trucks
 - Cable and associated material: 115 Trucks
 - Substation: 35 Trucks

These trips break down as follows:

- Piles will be delivered to the site as Site Access Road Construction is finalizing (approximately 1 month prior to access road construction is finalized). They will be delivered over approximately 3 months at a rate of about 3 trucks per day Monday – Friday.
- Racking will start being delivered to the site about 2 weeks after Solar Array Construction commences, which corresponds to when piles are first installed. Deliveries will take place over approximately 4 to 5 months at a rate of 5 to 6 truck trips per day.
- Solar panels will start being delivered about 1 to 2 months after Solar Array Construction commences and will take place over approximately 7 to 8 months. Delivery rates will be approximately 6 trucks per day.
- Inverter deliveries will take place over the course of the Solar Array Construction period (7 to 8 months) and will occur at a rate of 2 deliveries per week.
- Cable and associated material will be delivered to site during Access Road Construction and through the Solar Array Construction period occurring at a rate of 2 to 3 deliveries per week.
- Substation equipment will be delivered to the site during Access Road Construction through the first 2 months of Solar Array Construction at a rate of 1 to 2 deliveries per week.

It is important to note that deliveries will be dispersed throughout the site where the equipment is being installed. Installation will be completed in a phased approach. For example, piles will start installation, after a few weeks racking will start, and after a few more weeks panel installation will start. Deliveries will take place to the portion of the site where that installation is occurring and thus truck deliveries will be spread out across the site. During peak construction, when pile, racking, modules, cable and inverters are all being installed on the site, the peak equipment delivery truck counts will be approximately 15 to 20 trips per day.

- No.

Energy Environmental Review and Analysis

Questions for Development of Environmental Assessment

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PUC Docket No.	IP7132/GS-24-215	Directed To:	Brie Anderson
EERA Question No.	10	Please Respond By:	March 7, 2025

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Question(s):

Laydown Yards:

Please provide the following details regarding project laydown yards, based on current project design:

- Whether the two temporary laydown yards located outside of the project fence will have their own security fencing. If these two laydown yards will be fenced, please provide information regarding the fence design and construction.
- A description of the surface used for the 15 temporary laydown yards located within the project fence (described as “not graveled” in the Site Permit Application).
- Whether the permanent parking lot adjacent to the O&M building will be used as a laydown yard during the project construction phase.

Lauren Agnew

March 7, 2025

Environmental Review Manager

Date

MN Department of Commerce

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Coneflower Energy, LLC

Response to Energy Environmental Review and Analysis (EERA) Questions for Development of Environmental Assessment

In the Matter of the Application of Coneflower Energy, LLC for a Site Permit for the Coneflower Solar Project in
Lyon County, Minnesota

PUC Docket No.	IP7132/GS-24-215	Directed To:	Lauren Agnew
EERA Question No.	10	Date of Response:	March 14, 2025
Public		Nonpublic	

Note: Energy Environmental Review and Analysis staff intends to use information provided in this response to develop an environmental review document and is a public document. Responses to these questions will be considered to be public information unless otherwise designated by the respondent as nonpublic information pursuant to Minnesota Stat. § 13.02.

Question(s):

Laydown Yards:

Please provide the following details regarding project laydown yards, based on current project design:

- Whether the two temporary laydown yards located outside of the project fence will have their own security fencing. If these two laydown yards will be fenced, please provide information regarding the fence design and construction.
- A description of the surface used for the 15 temporary laydown yards located within the project fence (described as “not graveled” in the Site Permit Application).
- Whether the permanent parking lot adjacent to the O&M building will be used as a laydown yard during the project construction phase.

Response:

- **RESPONSE:** No, these will not be fenced.
- **RESPONSE:** These will be graded and/or matted (wooden mats), as needed.
- **RESPONSE:** Yes.

Name of Responder: Brie Anderson

Date: March 14, 2025

Title: Senior Director of Project Permitting

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Energy Environmental Review and Analysis

Questions for Development of Environmental Assessment

In the Matter of the Applications of Coneflower Energy, LLC for a Site Permit for the up to 235 MW
Coneflower Solar Project in Lyon County, Minnesota

PUC Docket No.	IP7132/GS-24-215	Directed To:	Brie Anderson
EERA Question No.	11	Please Respond By:	March 7, 2025

Note: Energy Environmental Review and Analysis staff intends to use information provided in this response to develop an environmental review document and is a public document. Responses to these questions will be considered to be public information unless otherwise designated by the respondent as nonpublic information pursuant to Minnesota Stat. § 13.02.

Question(s):

Employment Opportunities:

Please provide the following details regarding project employment:

- The approximate number of total temporary jobs generated during the construction and installation phase.
- An estimate of worker presence on site throughout the construction timeline (i.e., which phases require fewer numbers of workers, which phases will have “peak” worker numbers, etc.).
- Whether you will be paying workers according to the prevailing wage and apprenticeship rules of the Inflation Reduction Act.

Lauren Agnew

March 7, 2025

Environmental Review Manager

Date

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Coneflower Energy, LLC

Response to Energy Environmental Review and Analysis (EERA) Questions for Development of Environmental Assessment

In the Matter of the Application of Coneflower Energy, LLC for a Site Permit for the Coneflower Solar Project in
Lyon County, Minnesota

PUC Docket No.	IP7132/GS-24-215	Directed To:	Lauren Agnew
EERA Question No.	11	Date of Response:	March 14, 2025
Public		Nonpublic	

Note: Energy Environmental Review and Analysis staff intends to use information provided in this response to develop an environmental review document and is a public document. Responses to these questions will be considered to be public information unless otherwise designated by the respondent as nonpublic information pursuant to Minnesota Stat. § 13.02.

Question(s):

Employment Opportunities:

Please provide the following details regarding project employment:

- The approximate number of total temporary jobs generated during the construction and installation phase. I currently state there will be 200 temporary jobs (the “peak” worker numbers listed in the Site Permit Application) and want to confirm whether this is total temporary jobs or just “peak” temporary jobs.
- An estimate of worker presence on site throughout the construction timeline (i.e., which phases require fewer numbers of workers, which phases will have “peak” worker numbers, etc.).
- Whether you will be paying workers according to the prevailing wage and apprenticeship rules of the Inflation Reduction Act.

Response:

- At any one time there will be approximately 200 workers on-site. The peak is likely to be closer to 300 jobs.
- Module installation will have the peak number of workers; site grading and access road installation will have fewer workers (approximately 50).

- Yes, workers will be paid prevailing wage.

Name of Responder: Brie Anderson

Date: March 14, 2025

Title: Senior Director of Project Permitting

Energy Environmental Review and Analysis

Questions for Development of Environmental Assessment

In the Matter of the Applications of Coneflower Energy, LLC for a Site Permit for the up to 235 MW
Coneflower Solar Project in Lyon County, Minnesota

PUC Docket No.	IP7132/GS-24-215	Directed To:	Brie Anderson
EERA Question No.	12	Please Respond By:	March 7, 2025

Note: Energy Environmental Review and Analysis staff intends to use information provided in this response to develop an environmental review document and is a public document. Responses to these questions will be considered to be public information unless otherwise designated by the respondent as nonpublic information pursuant to Minnesota Stat. § 13.02.

Question(s):

Project Lighting:

Please indicate whether project lighting will be installed along the project perimeter fence or whether the project substation, O&M building, and inverters are the only areas that will have lighting. If additional lighting will be installed along the project perimeter fence, please describe the anticipated design (e.g., mounting, orientation, activation, etc.).

Lauren Agnew

March 7, 2025

Environmental Review Manager

Date

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Response to Energy Environmental Review and Analysis (EERA) Questions for Development of Environmental Assessment

In the Matter of the Application of Coneflower Energy, LLC for a Site Permit for the Coneflower Solar Project in
Lyon County, Minnesota

PUC Docket No.	IP7132/GS-24-215	Directed To:	Lauren Agnew
EERA Question No.	12	Date of Response:	March 14, 2025
Public		Nonpublic	

Note: Energy Environmental Review and Analysis staff intends to use information provided in this response to develop an environmental review document and is a public document. Responses to these questions will be considered to be public information unless otherwise designated by the respondent as nonpublic information pursuant to Minnesota Stat. § 13.02.

Question(s):

Project Lighting:

Please indicate whether project lighting will be installed along the project perimeter fence or whether the project substation, O&M building, and inverters are the only areas that will have lighting. If additional lighting will be installed along the project perimeter fence, please describe the anticipated design (e.g., mounting, orientation, activation, etc.).

Response:

There will not be project lighting along the perimeter of the Project. Project lighting will be limited to the Project substation, O&M building, and switch activated at inverters.

Name of Responder: Brie Anderson

Date: March 14, 2025

Title: Senior Director of Project Permitting

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Energy Environmental Review and Analysis

Questions for Development of Environmental Assessment

In the Matter of the Applications of Coneflower Energy, LLC for a Site Permit for the up to 235 MW
Coneflower Solar Project in Lyon County, Minnesota

PUC Docket No.	IP7132/GS-24-215	Directed To:	Brie Anderson
EERA Question No.	13	Please Respond By:	March 7, 2025

Note: Energy Environmental Review and Analysis staff intends to use information provided in this response to develop an environmental review document and is a public document. Responses to these questions will be considered to be public information unless otherwise designated by the respondent as nonpublic information pursuant to Minnesota Stat. § 13.02.

Question(s):

Project Finances:

Please provide the following details regarding project financials to the extent possible (knowing that markets are unpredictable):

- Project Cost –
 - An estimation of how much total project costs (\$550 million) may vary.
- Project Decommissioning –
 - The accuracy range of the estimated decommissioning cost.

Lauren Agnew

March 7, 2025

Environmental Review Manager

Date

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Response to Energy Environmental Review and Analysis (EERA) Questions for Development of Environmental Assessment

In the Matter of the Application of Coneflower Energy, LLC for a Site Permit for the Coneflower Solar Project in
Lyon County, Minnesota

PUC Docket No.	IP7132/GS-24-215	Directed To:	Lauren Agnew
EERA Question No.	13	Date of Response:	March 14, 2025
Public		Nonpublic	

Note: Energy Environmental Review and Analysis staff intends to use information provided in this response to develop an environmental review document and is a public document. Responses to these questions will be considered to be public information unless otherwise designated by the respondent as nonpublic information pursuant to Minnesota Stat. § 13.02.

Question(s):

Project Finances:

Please provide the following details regarding project financials to the extent possible (knowing that markets are unpredictable):

- Project Cost –
 - An estimation of how much total project costs (\$550 million) may vary.
- Project Decommissioning –
 - The accuracy range of the estimated decommissioning cost.

Response:

- Project costs may vary up to 15%.
- Decommissioning costs are accurate within approximately 10 percent. As noted in the Application, salvage values, engineering techniques, location of recycling centers are all variables that can change over the life of the Project, which is why the decommissioning plan is updated in year 10 and every 5 years thereafter.

Name of Responder: Brie Anderson

Date: March 14, 2025

Title: Senior Director of Project Permitting

Energy Environmental Review and Analysis

Questions for Development of Environmental Assessment

In the Matter of the Applications of Coneflower Energy, LLC for a Site Permit for the up to 235 MW
Coneflower Solar Project in Lyon County, Minnesota

PUC Docket No.	IP7132/GS-24-215	Directed To:	Brie Anderson
EERA Question No.	14	Please Respond By:	March 7, 2025

Note: Energy Environmental Review and Analysis staff intends to use information provided in this response to develop an environmental review document and is a public document. Responses to these questions will be considered to be public information unless otherwise designated by the respondent as nonpublic information pursuant to Minnesota Stat. § 13.02.

Question(s):

Project Area Infrastructure:

Please provide any details you have about the existing substation located along the southeastern project border.

Lauren Agnew

March 7, 2025

Environmental Review Manager

Date

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Response to Energy Environmental Review and Analysis (EERA) Questions for Development of Environmental Assessment

In the Matter of the Application of Coneflower Energy, LLC for a Site Permit for the Coneflower Solar Project in
Lyon County, Minnesota

PUC Docket No.	IP7132/GS-24-215	Directed To:	Lauren Agnew
EERA Question No.	14	Date of Response:	March 14, 2025
Public		Nonpublic	

Note: Energy Environmental Review and Analysis staff intends to use information provided in this response to develop an environmental review document and is a public document. Responses to these questions will be considered to be public information unless otherwise designated by the respondent as nonpublic information pursuant to Minnesota Stat. § 13.02.

Question(s):

Project Area Infrastructure:

Please provide any details you have about the existing substation located along the southeastern project border.

Response:

Based on parcel data, this existing facility is owned by Northern Border Pipeline Company and is a natural gas facility. The 69 kV transmission line associated with this substation provides power to the natural gas facility.

Name of Responder: Brie Anderson

Date: March 14, 2025

Title: Senior Director of Project Permitting

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Energy Environmental Review and Analysis

Questions for Development of Environmental Assessment

In the Matter of the Applications of Coneflower Energy, LLC for a Site Permit for the up to 235 MW
Coneflower Solar Project in Lyon County, Minnesota

PUC Docket No. IP7132/GS-24-215 Directed To: Brie Anderson

EERA Question No. 15 Please Respond By: March 7, 2025

Note: Energy Environmental Review and Analysis staff intends to use information provided in this response to develop an environmental review document and is a public document. Responses to these questions will be considered to be public information unless otherwise designated by the respondent as nonpublic information pursuant to Minnesota Stat. § 13.02.

Question(s):

Panel Heat:

Describe the heat generated by panels, if any, and the impacts it may have on surrounding properties and habitat.

Lauren Agnew

March 7, 2025

Environmental Review Manager

Date

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Coneflower Energy, LLC

Response to Energy Environmental Review and Analysis (EERA) Questions for Development of Environmental Assessment

In the Matter of the Application of Coneflower Energy, LLC for a Site Permit for the Coneflower Solar Project in
Lyon County, Minnesota

PUC Docket No.	IP7132/GS-24-215	Directed To:	Lauren Agnew
EERA Question No.	15	Date of Response:	March 14, 2025
Public		Nonpublic	

Note: Energy Environmental Review and Analysis staff intends to use information provided in this response to develop an environmental review document and is a public document. Responses to these questions will be considered to be public information unless otherwise designated by the respondent as nonpublic information pursuant to Minnesota Stat. § 13.02.

Question(s):

Panel Heat:

Describe the heat generated by panels, if any, and the impacts it may have on surrounding properties and habitat.

Response:

Given the panels are dark in nature due to the solar cells of the module, the PV field can exhibit temperatures a few degrees above ambient temperatures. Modules produce power which is a function of voltage and current. The current running through modules and wires does radiate some heat, but at inconsequential levels to flora or fauna.

Name of Responder: Brie Anderson

Date: March 14, 2025

Title: Senior Director of Project Permitting

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Energy Environmental Review and Analysis

Questions for Development of Environmental Assessment

In the Matter of the Applications of Coneflower Energy, LLC for a Site Permit for the up to 235 MW
Coneflower Solar Project in Lyon County, Minnesota

PUC Docket No.	IP7132/GS-24-215	Directed To:	Brie Anderson
EERA Question No.	16	Please Respond By:	March 12, 2025

Note: Energy Environmental Review and Analysis staff intends to use information provided in this response to develop an environmental review document and is a public document. Responses to these questions will be considered to be public information unless otherwise designated by the respondent as nonpublic information pursuant to Minnesota Stat. § 13.02.

Question(s):

Project Setbacks:

Please provide the minimum setback distance between the project fence line and the vegetated buffer surrounding County Ditch 29, based on current project design.

Lauren Agnew

March 12, 2025

Environmental Review Manager

Date

MN Department of Commerce

Coneflower Energy, LLC

Response to Energy Environmental Review and Analysis (EERA) Questions for Development of Environmental Assessment

In the Matter of the Application of Coneflower Energy, LLC for a Site Permit for the Coneflower Solar Project in
Lyon County, Minnesota

PUC Docket No.	IP7132/GS-24-215	Directed To:	Lauren Agnew
EERA Question No.	16	Date of Response:	March 14, 2025
Public		Nonpublic	

Note: Energy Environmental Review and Analysis staff intends to use information provided in this response to develop an environmental review document and is a public document. Responses to these questions will be considered to be public information unless otherwise designated by the respondent as nonpublic information pursuant to Minnesota Stat. § 13.02.

Question(s):

Project Setbacks:

Please provide the minimum setback distance between the project fence line and the vegetated buffer surrounding County Ditch 29, based on current project design.

Response:

The Project fenceline is immediately adjacent to this vegetated buffer around County Ditch 29 in a couple of areas. Coneflower Energy LLC's (Coneflower's) intent is to place the perimeter fence at the edge of the currently cultivated area and not in the vegetated buffer.

Name of Responder: Brie Anderson

Date: March 14, 2025

Title: Senior Director of Project Permitting

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Energy Environmental Review and Analysis

Questions for Development of Environmental Assessment

In the Matter of the Applications of Coneflower Energy, LLC for a Site Permit for the up to 235 MW
Coneflower Solar Project in Lyon County, Minnesota

PUC Docket No.	IP7132/GS-24-215	Directed To:	Brie Anderson
EERA Question No.	17	Please Respond By:	March 12, 2025

Note: Energy Environmental Review and Analysis staff intends to use information provided in this response to develop an environmental review document and is a public document. Responses to these questions will be considered to be public information unless otherwise designated by the respondent as nonpublic information pursuant to Minnesota Stat. § 13.02.

Question(s):

Collection Line Crossings:

The Site Permit Application states that are 3 collection line crossings proposed under delineated features – Wetland 37, Wetland 54, and Perennial Watercourse 1. Please provide the following information:

- Confirmation that “Perennial Watercourse 1” is County Ditch 29 and any special construction methods or techniques that will be applied when boring to prevent impacts to county drain systems.
- The locations of Wetland 37 and Wetland 54.

Lauren Agnew

March 12, 2025

Environmental Review Manager

Date

MN Department of Commerce

Coneflower Energy, LLC

Response to Energy Environmental Review and Analysis (EERA) Questions for Development of Environmental Assessment

In the Matter of the Application of Coneflower Energy, LLC for a Site Permit for the Coneflower Solar Project in
Lyon County, Minnesota

PUC Docket No.	IP7132/GS-24-215	Directed To:	Lauren Agnew
EERA Question No.	17	Date of Response:	March 14, 2025
Public		Nonpublic	

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Question(s):

Collection Line Crossings:

The Site Permit Application states that are 3 collection line crossings proposed under delineated features – Wetland 37, Wetland 54, and Perennial Watercourse 1. Please provide the following information:

- Confirmation that “Perennial Watercourse 1” is County Ditch 29 and any special construction methods or techniques that will be applied when boring to prevent impacts to county drain systems.
- The locations of Wetland 37 and Wetland 54.

Response:

- Confirmed – Perennial Watercourse 1 is County Ditch 29. Boring of this watercourse will follow typical boring techniques, with bore pit entry and exit points located at adequate distances such that the collection line is no closer than 3 feet from the base of County Ditch 29.

- Wetland 37 is a large wetland west of Lake of the Hill for which one collection circuit crosses the southern tip. Wetland 54 is north of US 14 in the eastern block (Pages 4b and 4c) and one collection circuit crosses the center of it.

Energy Environmental Review and Analysis

Questions for Development of Environmental Assessment

In the Matter of the Applications of Coneflower Energy, LLC for a Site Permit for the up to 235 MW
Coneflower Solar Project in Lyon County, Minnesota

PUC Docket No.	IP7132/GS-24-215	Directed To:	Brie Anderson
EERA Question No.	18	Please Respond By:	March 12, 2025

Note: Energy Environmental Review and Analysis staff intends to use information provided in this response to develop an environmental review document and is a public document. Responses to these questions will be considered to be public information unless otherwise designated by the respondent as nonpublic information pursuant to Minnesota Stat. § 13.02.

Question(s):

Project Damage:

Please describe how the project would be safely repaired from extreme damage scenarios such as hailstorms and discuss who bears financial responsibility for said repairs.

Lauren Agnew

March 12, 2025

Environmental Review Manager

Date

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Response to Energy Environmental Review and Analysis (EERA) Questions for Development of Environmental Assessment

In the Matter of the Application of Coneflower Energy, LLC for a Site Permit for the Coneflower Solar Project in
Lyon County, Minnesota

PUC Docket No.	IP7132/GS-24-215	Directed To:	Lauren Agnew
EERA Question No.	18	Date of Response:	March 14, 2025
Public		Nonpublic	

Note: Energy Environmental Review and Analysis staff intends to use information provided in this response to develop an environmental review document and is a public document. Responses to these questions will be considered to be public information unless otherwise designated by the respondent as nonpublic information pursuant to Minnesota Stat. § 13.02.

Question(s):

Project Damage:

Please describe how the project would be safely repaired from extreme damage scenarios such as hailstorms and discuss who bears financial responsibility for said repairs.

Response:

In the event of an extreme damage scenario, Coneflower would be financially responsible for repairs. Any repair, whether routine maintenance or after an extreme damage scenario, would be completed safely. This is accomplished by isolating and deenergizing any operating panels around the affected area. Racking and array replacement would then occur as described in Section 4.5 of the Site Permit Application, limited to the affected area. Once repairs are completed, testing and commissioning would occur prior to returning to full operations. Repairs will be made by appropriately licensed personnel (i.e., electrical contractors).

Name of Responder: Brie Anderson

Date: March 14, 2025

Title: Senior Director of Project Permitting

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Energy Environmental Review and Analysis

Questions for Development of Environmental Assessment

In the Matter of the Applications of Coneflower Energy, LLC for a Site Permit for the up to 235 MW
Coneflower Solar Project in Lyon County, Minnesota

PUC Docket No.	IP7132/GS-24-215	Directed To:	Brie Anderson
EERA Question No.	19	Please Respond By:	March 12, 2025

Note: Energy Environmental Review and Analysis staff intends to use information provided in this response to develop an environmental review document and is a public document. Responses to these questions will be considered to be public information unless otherwise designated by the respondent as nonpublic information pursuant to Minnesota Stat. § 13.02.

Question(s):

Existing Site Vegetation:

Please provide any information on the existing native and non-native vegetation within the project area that was collected during site visits.

Lauren Agnew

March 12, 2025

Environmental Review Manager

Date

MN Department of Commerce

Coneflower Energy, LLC

Response to Energy Environmental Review and Analysis (EERA) Questions for Development of Environmental Assessment

In the Matter of the Application of Coneflower Energy, LLC for a Site Permit for the Coneflower Solar Project in
Lyon County, Minnesota

PUC Docket No.	IP7132/GS-24-215	Directed To:	Lauren Agnew
EERA Question No.	19	Date of Response:	March 14, 2025
Public		Nonpublic	

Note: Energy Environmental Review and Analysis staff intends to use information provided in this response to develop an environmental review document and is a public document. Responses to these questions will be considered to be public information unless otherwise designated by the respondent as nonpublic information pursuant to Minnesota Stat. § 13.02.

Question(s):

Existing Site Vegetation:

Please provide any information on the existing native and non-native vegetation within the project area that was collected during site visits.

Response:

During the wetland delineation, Coneflower observed the following invasive and native plants:

- **Invasive and Noxious Weed Plants** - Birdsfoot trefoil (*Lotus corniculatus*), Canada thistle (*Cirsium arvense*; also on the Noxious weed “prohibited – control” list by Minnesota Department of Agriculture), Reed canary grass (*Phalaris arundinacea*) (note this grass is listed as both native and invasive [[Reed canary grass \(Phalaris arundinacea\) | Minnesota DNR](#)]), Smooth brome grass (*Bromus inermis*), and Common buckthorn (*Rhamnus cathartica*; also on the Noxious weed “restricted” list by Minnesota Department of Agriculture).
- **Native Plants** - American vetch or Purple vetch (*Vicia americana*), Canadian milkvetch (*Astragalus canadensis*), American plum (*Prunus americana*), Canada goldenrod (*Solidago canadensis*), native Phragmites (*Phragmites australis*, note different subspecies are listed on both Native and Prohibited-Control lists; subspecies not

identified during wetland delineation), Water hemlock (*Cicuta maculata*), and Virginia creeper (*Parthenocissus quinquefolia*).

Energy Environmental Review and Analysis

Questions for Development of Environmental Assessment

In the Matter of the Applications of Coneflower Energy, LLC for a Site Permit for the up to 235 MW
Coneflower Solar Project in Lyon County, Minnesota

PUC Docket No.	IP7132/GS-24-215	Directed To:	Brie Anderson
EERA Question No.	20	Please Respond By:	March 12, 2025

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Question(s):

Agency/LGU Coordination:

Please indicate whether the following approvals/determinations have occurred to date, and provide documentation of their occurrence. If any of the following approvals/determinations are not applicable to the project, indicate that here:

- Concurrence from SHPO that the project will not adversely impact cultural or historic resources.
- Approval of the wetland delineation conducted in 2023 from U.S. ACE and/or Lyon County SWCD
- Effect determinations for the species identified in the IPaC resource list

Lauren Agnew

March 12, 2025

Environmental Review Manager

Date

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Response to Energy Environmental Review and Analysis (EERA) Questions for Development of Environmental Assessment

In the Matter of the Application of Coneflower Energy, LLC for a Site Permit for the Coneflower Solar Project in
Lyon County, Minnesota

PUC Docket No.	IP7132/GS-24-215	Directed To:	Lauren Agnew
EERA Question No.	20	Date of Response:	March 14, 2025
Public		Nonpublic	

Note: Energy Environmental Review and Analysis staff intends to use information provided in this response to develop an environmental review document and is a public document. Responses to these questions will be considered to be public information unless otherwise designated by the respondent as nonpublic information pursuant to Minnesota Stat. § 13.02.

Question(s):

Agency/LGU Coordination:

Please indicate whether the following approvals/determinations have occurred to date, and provide documentation of their occurrence. If any of the following approvals/determinations are not applicable to the project, provide a brief explanation why:

- Concurrence from SHPO that the project will not adversely impact cultural or historic resources.
- Approval of the wetland delineation conducted in 2023 from U.S. ACE and/or Lyon County SWCD
- Effect determinations for the species identified in the IPaC resource list

Response:

- The Project received concurrence from the State Historic Preservation Office (SHPO) that the Project will not adversely affect cultural or historic resources on September 5, 2024. This concurrence letter was provided to eDockets on September 18, 2024 in reply comments.
- The Project design avoids impacts to potential Waters of the United States (WOTUS) that were identified in the 2023 wetland delineation. As noted above, there will be collection crossings of a perennial stream (County Ditch 29), two wetlands, and

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associated perennial vegetated buffers in accordance with the Minnesota Buffer Law. Coneflower will avoid impacts to these features by boring beneath them and in accordance with the U.S. Army Corps of Engineers (USACE) St. Paul District Utility Regional General Permit conditions. Please note that in October 2016, the USACE issued Regulatory Guidance Letter (RGL) No. 16-01 which provides guidance to USACE field offices and the regulated public on when it may be appropriate for the USACE to issue a Jurisdictional Determination (JD) and when it may not be appropriate for the USACE to prepare any JD. Coneflower has relied on the expertise of outside consultants to identify WOTUS within its Project area and has determined that based on the nature of the anticipated impacts, Coneflower does not trigger a pre-construction notification (PCN) to the USACE for use of a nationwide permit to comply with the Clean Water Act section 404, nor is Coneflower required to obtain a JD.

- Due to several species status changes since the U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) report provided with the Site Permit Application, Coneflower recently refreshed the IPaC resource list report on March 13, 2025 (Attachment A). The species currently listed on the IPaC are the monarch butterfly (*Danaus plexippus*, proposed threatened), Suckley's cuckoo bumble bee (*Bombus suckleyi*, proposed endangered), and Western regal fritillary (*Argynnis idalia occidentalis*, proposed threatened). Coneflower notes that USFWS does not issue effect determinations for species proposed for listing. While neither the northern long-eared bat nor tricolored bat are included on this recent IPaC list, as noted in Sections 5.5.8.3 and 6.1.1.1 of the Site Permit Application, Coneflower will limit any tree clearing (if necessary) to November 15 through April 1 as a best management practice for bats.