

# **APPENDIX B**

## **AGENCY CORRESPONDENCE**

## **SAMPLE PROJECT NOTIFICATION LETTER**



October 29, 2024

NAME

AGENCY

TITLE

ADDRESS

CITY, MN ZIP

EMAIL

**RE: Crane and Sandhill Battery Energy Storage Projects in Olmsted County, Minnesota**

Crane Energy Storage LLC (Crane Storage) and Sandhill Energy Storage LLC (Sandhill Storage), wholly owned subsidiaries of Copenhagen Infrastructure Partners (CIP), propose to construct the Crane Battery Energy Storage System (BESS) Project (Crane Project) and the Sandhill BESS Project (Sandhill Project), collectively the Projects, adjacent to one another in Township 107N, Range 15W, Sections 30 and 31, in Olmsted County, Minnesota. Each BESS will charge its batteries with energy from the electric transmission grid, when excess power is available, via the Point of Interconnection (POI) at Southwest Minnesota Municipal Power Agency's Byron Substation, store that energy on site, and later deliver that energy back to the transmission grid through the same POI, when it is needed. These Projects will aid the region's ongoing transition to renewables, ensure reliable electric service in the area, provide significant economic benefits to local residents, and help Minnesota achieve its clean energy goals.

The Crane Project and Sandhill Project will each be able to store a maximum of 800 megawatt hours (MWh) of electricity at a given time, with a maximum injection capacity of 200 MW into the electric transmission grid. In addition, Crane Storage and Sandhill Storage are proposing to construct collector substations adjacent to the BESS and an approximately 500-foot-long 161 kilovolt (kV) generation-tie (gen-tie) line that will be shared by the two projects to interconnect to the existing Byron Substation, the POI for both projects. An overview map of the Projects is enclosed.

The Projects require Site Permits from the Minnesota Public Utilities Commission (Commission). Crane and Sandhill intend to file a Joint Site Permit Application (Application) with the Commission in the first quarter of 2025. Pending receipt of all required permits and approvals, construction of the Projects is anticipated to begin in the first quarter of 2027, with commercial operation by the second quarter of 2028. Construction of the Projects may be staggered so that one project would begin commercial operation before the other.

We welcome any comments your agency may have at this time and throughout the Commission's application review process. Any written agency comments provided in response to this letter will be incorporated into the Commission's review process. If you have questions and would like additional information about the proposed Projects, or if you have any information we should consider evaluating, please contact me at [jfinocchi@tenaska.com](mailto:jfinocchi@tenaska.com) or (402) 691-9577.

Sincerely,



Joseph M. Finocchiaro  
Crane Energy Storage LLC  
Sandhill Energy Storage LLC  
c/o Tenaska, Inc.  
14302 FNB Parkway  
Omaha, NE 68154  
Phone: (402) 691-9577  
Email: [jfinocchi@tenaska.com](mailto:jfinocchi@tenaska.com)

Enclosure: Project Overview Map

Cc: Jarrod Pitts, Tenaska, Inc.  
James Hingston, Tenaska, Inc.  
Jeremy Duehr, Fredrikson & Byron  
Monika H. Davis, Merjent, Inc.



## **FEDERAL AGENCIES**

**From:** [Parker, Kaecey R CIV USARMY CEMVP \(USA\)](#)  
**To:** [jfinocchiaro@tenaska.com](mailto:jfinocchiaro@tenaska.com)  
**Subject:** Crane and Sandhill BESS Projects  
**Date:** Monday, November 4, 2024 9:14:14 AM

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You don't often get email from kaecey.r.parker@usace.army.mil. [Learn why this is important](#)

**Caution: External email, think before you click!**

Hello,

The Corps of Engineers St. Paul District Regulatory Division (the Corps) recently received a request for comments on the Crane and Sandhill BESS Projects.

Our office is committed to efficient, helpful service. It is unclear if your project will have impacts to jurisdictional waters. If your project will have impacts to aquatic resources, please submit a permit application with the impacts clearly identified and we can assist you through our permit review process if authorization is required.

You may also request a pre-application meeting to discuss your project prior to submitting a permit application. You can find more information on our permit program and our joint application here: <https://www.mvp.usace.army.mil/Missions/Regulatory/Permitting-Process-Procedures/>. \*Be sure to select the pre-application box on the joint application.

Please note this recommendation is only pertaining to the Corps process and does NOT indicate whether a review is required from the state or local authorities.

If we do not receive a response from you within 3 business days we will assume nothing further is needed from our office.

Respectfully,

Kaecey Parker  
Environmental Protection Technician  
Regulatory Division, St. Paul District  
U.S. Army Corps of Engineers

**From:** [Monika Davis](#)  
**To:** [usace\\_requests\\_mn@usace.army.mil](mailto:usace_requests_mn@usace.army.mil)  
**Cc:** [Finocchiario, Joseph](#); [Pitts, Jarrod](#)  
**Subject:** Project Introduction - Crane and Sandhill BESS Projects  
**Date:** Tuesday, October 29, 2024 4:36:00 PM  
**Attachments:** [image001.png](#)  
[U.S. Army Corps of Engineers Crane and Sandhill Projects 10-29-2024.pdf](#)

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The attached letter provides additional information about the Projects, an overview map of their location, and contact information for Tenaska. We welcome any comments your agency may have at this time and throughout the Commission's application review process. Any written agency comments provided in response to this letter will be incorporated into the Commission's review process.

Regards,

**Monika H. Davis (she/her)**  
**Senior Project Manager**  
612.924.3988 direct  
612.600.8010 mobile  
[monika.davis@merjent.com](mailto:monika.davis@merjent.com)



1 Main Street SE, Suite 300  
Minneapolis, MN 55414  
612.746.3660  
[www.merjent.com](http://www.merjent.com)



October 29, 2024

U.S. Army Corps of Engineers  
La Crescent Field Office  
1114 S Oak St  
La Crescent, MN 55947  
[usace\\_requests\\_mn@usace.army.mil](mailto:usace_requests_mn@usace.army.mil)

**RE: Crane and Sandhill Battery Energy Storage Projects in Olmsted County, Minnesota**

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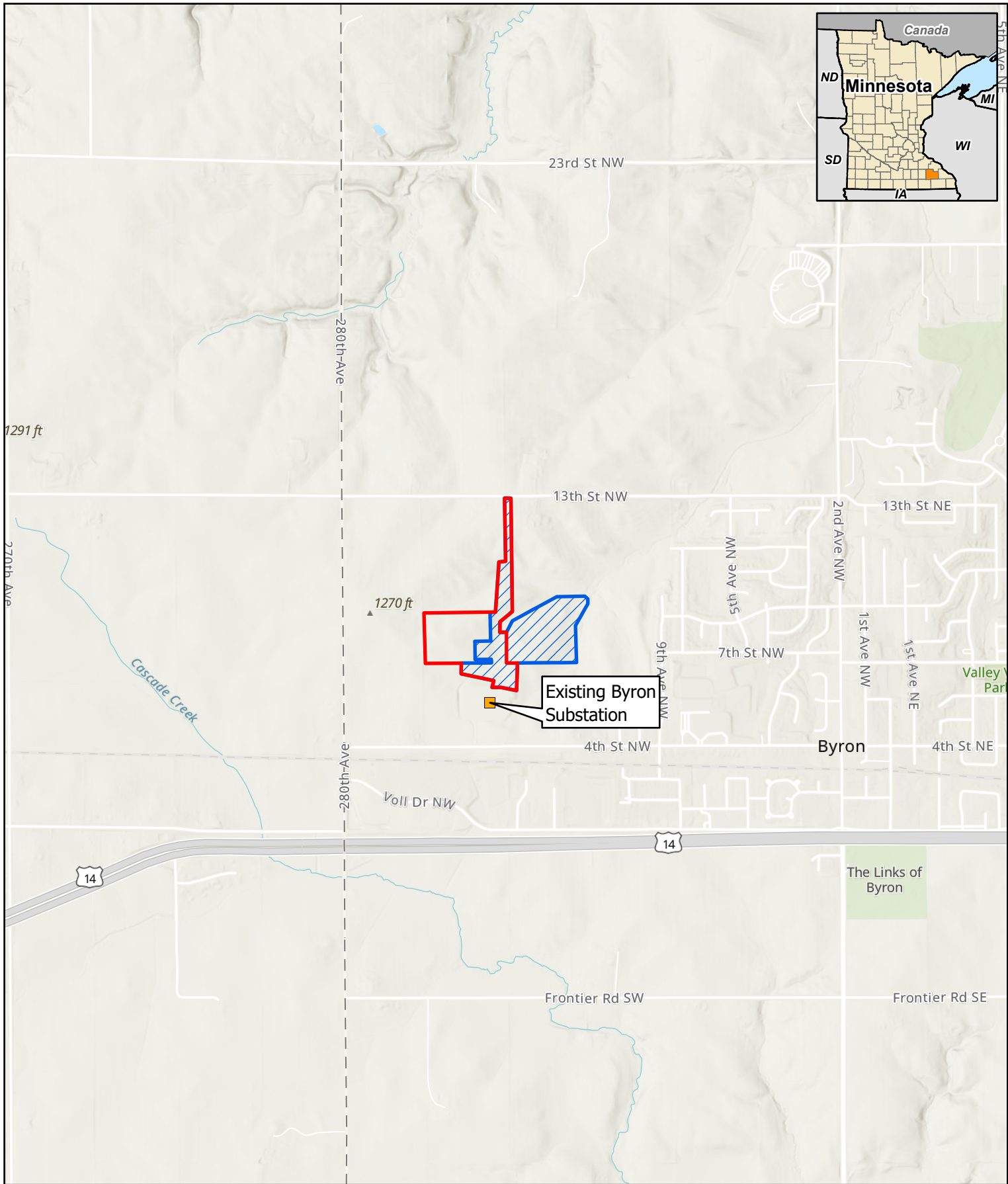
Sincerely,

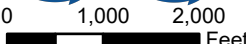





Joseph M. Finocchiaro  
Crane Energy Storage LLC  
Sandhill Energy Storage LLC  
c/o Tenaska, Inc.  
14302 FNB Parkway  
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Phone: (402) 691-9577  
Email: [jfinocchi@tenaska.com](mailto:jfinocchi@tenaska.com)

Enclosure: Project Overview Map




Cc: Jarrod Pitts, Tenaska, Inc.  
James Hingston, Tenaska, Inc.  
Jeremy Duehr, Fredrikson & Byron  
Monika H. Davis, Merjent, Inc.





1 inch = 2,000 feet  
For Environmental Review Purposes Only

**Project Overview Map**  
**Crane and Sandhill Projects**  
**Crane Energy Storage, LLC and**  
**Sandhill Energy Storage, LLC**  
**Olmsted County, Minnesota**

-  Crane Project
-  Sandhill Project
-  Existing Substation

**From:** [Duchatellier, Marla \(FAA\)](#)  
**To:** [Monika Davis](#)  
**Cc:** [jfinocchi@tenaska.com](mailto:jfinocchi@tenaska.com); [Pitts, Jarrod](#)  
**Subject:** EXTERNAL: RE: Project Introduction - Crane and Sandhill BESS Projects  
**Date:** Thursday, October 31, 2024 3:33:36 PM  
**Attachments:** [image002.png](#)  
[image003.png](#)  
[Add a New Case \(Off Airport\) - Desk Reference Guide V. 2018.2.1 \(1\).pdf](#)

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**CAUTION:** This email originated from outside of Merjent.

Hi Monika,

Thanks for the information, but it won't be going in a case file unless you file an Aeronautical Study.

Please click on the Notice Criteria link below to find out if you need to file.

<https://oeaaa.faa.gov/oeaaa/external/gisTools/gisAction.jsp?action=showNoNoticeRequiredToolForm>

The instructions are below and attached.

To file an aeronautical study, you'll need an account on our website, <https://oeaaa.faa.gov>. Click on the "New User Registration" link, located about 2/3 of the way down the left side of the web page, and fill out the online form. Once you've completed that and logged in to your portal page, click on the "Add New Case (Off Airport)" link at the top of the center column of the web page. The very first time you do this, you'll be asked to enter your sponsor information. This will largely be a repeat of the information you entered when you registered on the web page. For all subsequent submission, your sponsor information will just be an entry on a dropdown menu at the top of the online (7460-1).

Once your account has been created and you're logged on to your portal page, click on the "Add New Case (Off Airport)" if it's not on airport property, or "Add New Case (On Airport)" if it's on airport property, link at the top of the center (Off Airport) or top of the right (On Airport) column of the page. The very first time you do this; you'll be asked for sponsor information. This will largely be a repeat of the info you entered when you registered for the website, and unless you add additional sponsors later, you'll never have to enter sponsor information on any future studies. Once the sponsor information has been entered, you can move on to the online FAA Form 7460-1.

For a crane, the type of notice will be "Construction," and the duration will be "Temporary." Enter an estimated duration for the crane activity or window, and an estimated work schedule (don't worry, we won't hold you to it; it's just to give us an idea of about when you'll be operating). Most of the rest is self-explanatory. For the coordinates, use the latitude and longitude of the point of the crane operating area closest to the nearest airport or runway, and use the site elevation of the highest point of the crane's operating area (even if the closest and highest points aren't at the same location). This will give us a worst-case scenario. Some items with red asterisks aren't really required, such as Current Height. If you're requesting a desired height but can possibly do the job at a lower tip height, enter the lower height value in the "Minimum Operating Height" block. If, for some reason, it won't allow you to enter anything into the block, don't worry about it (that

sometimes happens). Any crane higher than 200' AGL is going to require marking and lighting, usually a red light and an obstruction flag at the highest point (or, for a luffing jib, the highest point when the jib is raised and the highest point when the jib is at its lowest point, if they're different), so you can choose red lights and flags from the "Requested Marking/Lighting" menu, or you can just request "None" and we'll tell you if you need it or not. Select "Crane" for "Structure Type," and you can assign any name you like for the "Structure Name." The description of the location can be a street address or an approximate location on the parcel of land where the crane will be operating, and the description of the proposal can just state that you're using a crane for construction of a building or whatever its purpose may be. If the building has already been studied by the FAA (and in this case, it should have), please include the Aeronautical Study Number(s) of the permanent building.

*Peace & Love,*

Marla Duchatellier  
OE Technician: Nebraska, Minnesota and Kansas State  
Obstruction Evaluation Group (OEG), AJV-A520  
Office: 817-222-5323  
[Marla.Duchatellier@faa.gov](mailto:Marla.Duchatellier@faa.gov)  
<https://oeaaa.faa.gov>



- 1) To see if your structure is required to file with FAA, please go to:  
<https://oeaaa.faa.gov/oeaaa/external/gisTools/gisAction.jsp?action=showNoNoticeRequiredToolForm>
- 2) OEAAA.faa.gov Filing Instructions:  
<https://oeaaa.faa.gov/oeaaa/external/content/instructions.jsp>
- 3) General FAQs: <https://oeaaa.faa.gov/oeaaa/external/searchAction.jsp?action=generalFAQs>
- 4) DOT/FAA Obstruction Marking & Lighting Advisory Circular (AC 70/7460-1M):  
[https://www.faa.gov/regulations\\_policies/advisory\\_circulars/index.cfm/go/document.information/documentID/1030047](https://www.faa.gov/regulations_policies/advisory_circulars/index.cfm/go/document.information/documentID/1030047)
- 5) Light Outage Reporting: <https://oeaaa.faa.gov/oeaaa/external/content/lightOutageReporting.jsp>
- 6) Helpdesk (System Issues/Support): 202-580-7500/Email: [oeaaa\\_helpdesk@cghtech.com](mailto:oeaaa_helpdesk@cghtech.com)

---

**From:** Monika Davis <monika.davis@merjent.com>  
**Sent:** Tuesday, October 29, 2024 4:38 PM  
**To:** Duchatellier, Marla (FAA) <Marla.Duchatellier@faa.gov>  
**Cc:** jfinocchiario@tenaska.com; Pitts, Jarrod <JPitts@TENASKA.com>



**Subject:** Project Introduction - Crane and Sandhill BESS Projects

**CAUTION:** This email originated from outside of the Federal Aviation Administration (FAA). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon,

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Regards,

**Monika H. Davis (she/her)**  
**Senior Project Manager**

612.924.3988 direct

612.600.8010 mobile

[monika.davis@merjent.com](mailto:monika.davis@merjent.com)



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Minneapolis, MN 55414

612.746.3660

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October 29, 2024

Marla Duchatellier  
Federal Aviation Administration  
Obstruction Evaluation Technician  
Obstruction Evaluation / Airport Airspace Analysis for Minnesota  
Marla.Duchatellier@faa.gov

**RE: Crane and Sandhill Battery Energy Storage Projects in Olmsted County, Minnesota**

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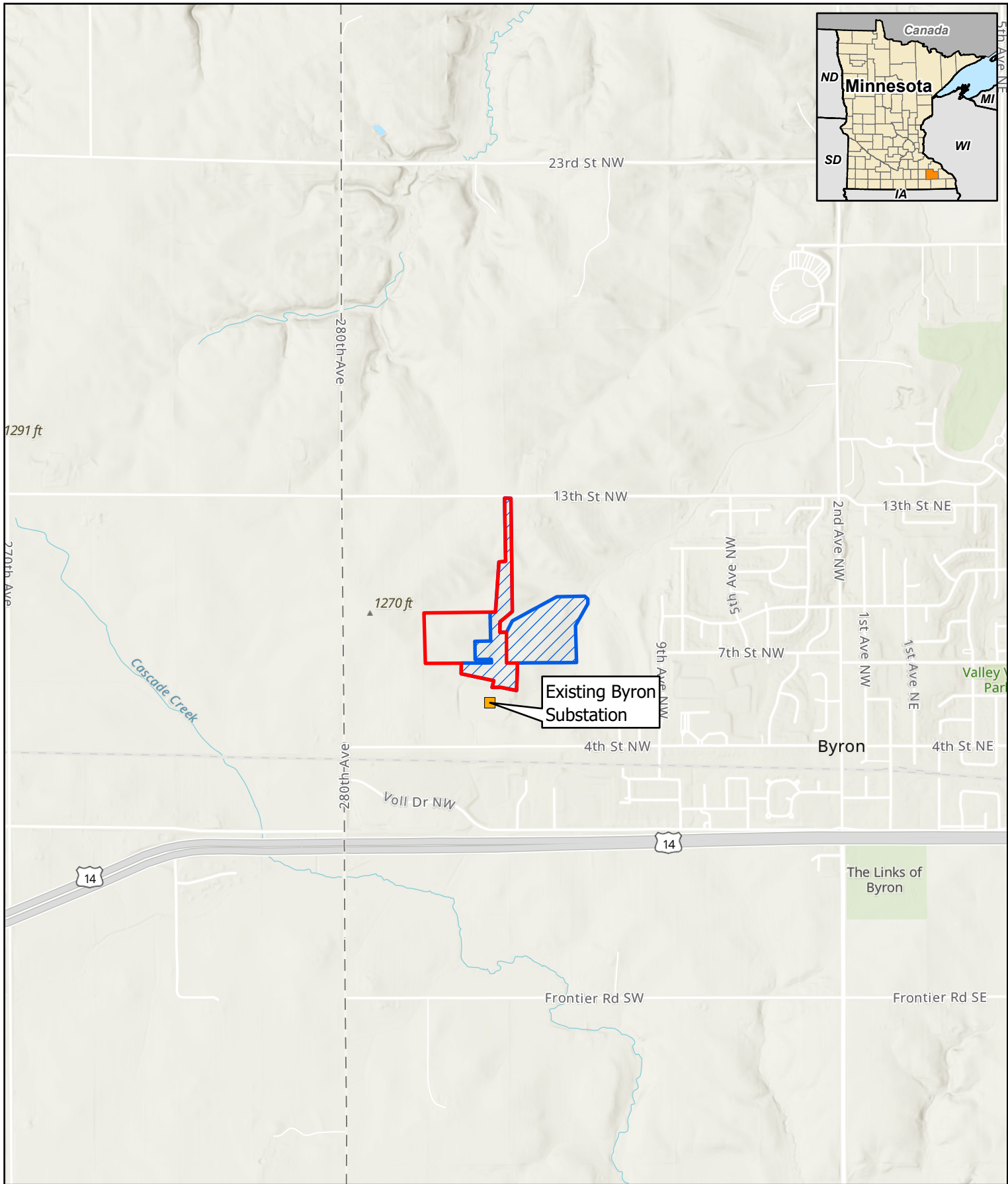
Sincerely,

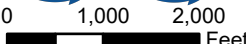





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Crane Energy Storage LLC  
Sandhill Energy Storage LLC  
c/o Tenaska, Inc.  
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Omaha, NE 68154  
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**From:** [Bartels, Dylan - FPAC-NRCS, MN](#)  
**To:** [Monika Davis](#)  
**Cc:** [jfinocchiario@tenaska.com](mailto:jfinocchiario@tenaska.com); [Pitts, Jarrod](#); [Newton, Luther - FPAC-NRCS, MN](#); [Voigt, David - FPAC-NRCS, MN](#)  
**Subject:** EXTERNAL: RE: [External Email]Project Introduction - Crane and Sandhill BESS Projects  
**Date:** Tuesday, November 12, 2024 1:25:09 PM  
**Attachments:** [image001.png](#)

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**CAUTION:** This email originated from outside of Merjent.

Monika,

Our Biologist (David Voigt) is working on a response.

## Dylan J. Bartels

Acting Rochester Team Lead

---

**From:** Monika Davis <[monika.davis@merjent.com](mailto:monika.davis@merjent.com)>  
**Sent:** Wednesday, October 30, 2024 12:40 PM  
**To:** Bartels, Dylan - FPAC-NRCS, MN <[Dylan.Bartels@usda.gov](mailto:Dylan.Bartels@usda.gov)>  
**Cc:** [jfinocchiario@tenaska.com](mailto:jfinocchiario@tenaska.com); [Pitts, Jarrod <JPitts@TENASKA.com>](mailto:JPitts@TENASKA.com)  
**Subject:** [External Email]Project Introduction - Crane and Sandhill BESS Projects

You don't often get email from [monika.davis@merjent.com](mailto:monika.davis@merjent.com). [Learn why this is important](#)

**[External Email]**

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Use caution before clicking links or opening attachments.

Please send any concerns or suspicious messages to: [Spam.Abuse@usda.gov](mailto:Spam.Abuse@usda.gov)

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[www.merjent.com](http://www.merjent.com)

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October 30, 2024

Dylan Bartels

U.S. Department of Agriculture-Natural Resources Conservation Service

Rochester Service Center

3555 9<sup>th</sup> Street NW

Rochester, MN 55901

[Dylan.bartels@usda.gov](mailto:Dylan.bartels@usda.gov)

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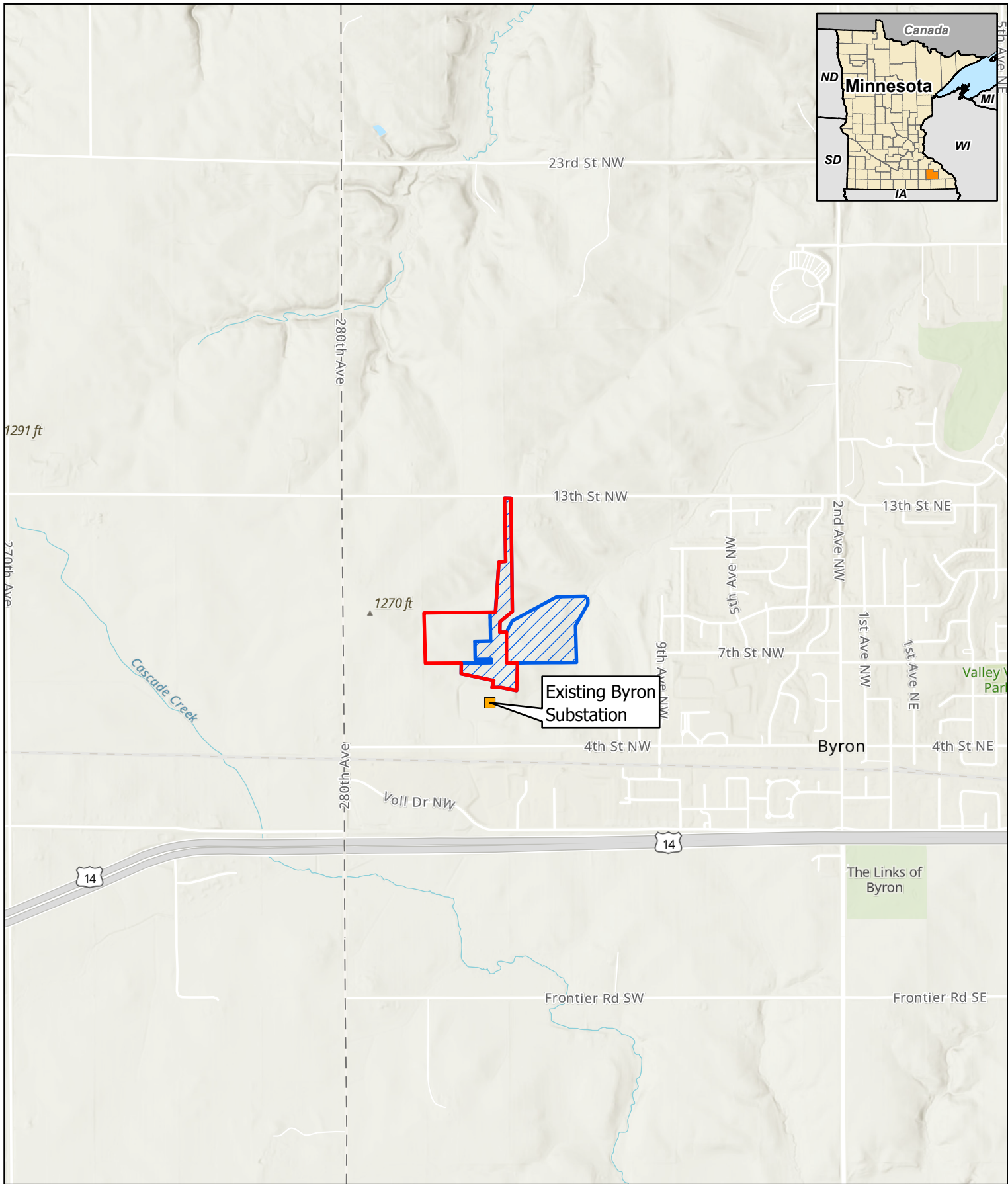
A handwritten signature in blue ink, appearing to read 'J. Finocchiaro', with a small dot above the 'i'.

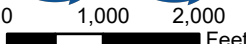



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-  Existing Substation



United States Department of Agriculture

November 13, 2024

Joseph M. Finocchiaro  
Crane Energy Storage LLC  
Sandhill Energy Storage LLC  
c/o Tenaska, Inc.  
14302 FNB Parkway  
Omaha, NE 68154

SUBJECT: Determination of Impacts to Unique and/or Prime Farmland Crane and Sandhill Battery Energy Projects in Olmsted County, Minnesota

Dear Joseph M. Finocchiaro:

The Natural Resources Conservation Service (NRCS) has reviewed the above referenced project. Our review has found that the Northern Lights Expansion Project is not likely to affect USDA easements, see attached map. Contact Kaitlyn Miller, [kaitlyn.miller@usda.gov](mailto:kaitlyn.miller@usda.gov), 651-602-7855, for additional information pertaining to this easement.

Additionally, the project sponsors are not USDA program benefit recipients, thus the wetland conservation provisions of the 1985 Food Security act, as amended are not applicable. It should be noted, however, that actions by a non-USDA participant third party (project sponsor) which impact agricultural wetlands owned or operated by USDA participants, may jeopardize the owner/operators USDA eligibility. If such impacts are anticipated, the owner/operator should contact the county Farm Service Agency (FSA) office to consider an application for a third-party exemption.

The following agencies may have federal or state wetlands, floodplain delineation, cultural resources, water quality, air quality or threatened and endangered species jurisdiction in the proposed project and should be consulted.

- Army Corps of Engineers (USACOE) – Clean Water Act
- US Fish and Wildlife Service (FWS) – Endangered Species Act
- Board of Water and Soil Resources (BWSR) - Minnesota Wetlands Conservation Act
- Minnesota Department of Natural Resources (MDNR)
- Minnesota Pollution Control Agency (MPCA)
- State Historic Preservation Officer/State Archaeologist (SHPO)

Finally, if as a result of your proposal you are affecting agricultural lands, and if any federal monies are involved, it is a requirement that a Farmland Policy Protection Act (FPPA) site assessment be appropriately filed. To determine if the proposed undertaking is exempt from the Farmland Protection Policy Act (FPPA) call or email Joseph Brennan, State Soil Scientist, (651) 602-7925 or [joseph.brennan@usda.gov](mailto:joseph.brennan@usda.gov). If the undertaking is not exempt, please fill out your agency's portion Form AD-1006 or NRCS-CPA-106 (corridor projects) and submit it along with other supporting information.

The current versions of the above FPPA forms are available online:  
<https://www.nrcs.usda.gov/wps/portal/nrcs/main/national/landuse/fppa/>

Sincerely,

**RYAN GALBREATH**

Digitally signed by RYAN  
GALBREATH  
Date: 2025.01.08 12:34:13 -06'00'

RYAN GALBREATH  
Environmental Review and Justice Program

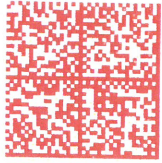
cc:  
Kaitlyn Miller, Easement Program Manager, NRCS, St. Paul, MN





USDA-NRCS  
375 Jackson Street  
Suite 600  
St. Paul, MN 55101-1854

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Joseph M. Finocchiaro  
Crane Energy Storage LLC  
Sandhill Energy Storage LLC  
c/o Tenaska, Inc.  
14302 FNB Parkway  
Omaha NE 68154

6815434446 R044



## **TRIBAL NATIONS**

**From:** [Leonard Wabasha \(TO\)](#)  
**To:** [Monika Davis](#)  
**Cc:** [jfinocchiario@tenaska.com](mailto:jfinocchiario@tenaska.com); [Pitts, Jarrod](#)  
**Subject:** EXTERNAL: RE: Project Introduction - Crane and Sandhill BESS Projects  
**Date:** Tuesday, October 29, 2024 4:52:15 PM  
**Attachments:** [image002.png](#)  
[image003.png](#)

**CAUTION:** This email originated from outside of Merjent.

Dear Monika Davis

Thank you for the opportunity to consult with you on this proposed project in Olmstead County Minnesota. When the archaeological literature review/study is prepared and available please share the information with us. Thank you for the notice and Have a Great Day!!



**LEONARD WABASHA**

Tribal Historic Preservation Officer • Cultural Resources  
Shakopee Mdewakanton Sioux Community  
d: 952.496.6120  
[shakopeedakota.org](http://shakopeedakota.org)  
[Leonard.Wabasha@shakopeedakota.org](mailto:Leonard.Wabasha@shakopeedakota.org)

The Shakopee Mdewakanton Sioux Community is a federally recognized, sovereign Indian tribe located southwest of Minneapolis/St. Paul. With a focus on being a good neighbor, good steward of the earth, and good employer, the SMSC is committed to charitable donations, community partnerships, a healthy environment, and a strong economy.

---

**From:** Monika Davis <[monika.davis@merjent.com](mailto:monika.davis@merjent.com)>  
**Sent:** Tuesday, October 29, 2024 4:32 PM  
**To:** Leonard Wabasha (TO) <[leonard.wabasha@shakopeedakota.org](mailto:leonard.wabasha@shakopeedakota.org)>  
**Cc:** [jfinocchiario@tenaska.com](mailto:jfinocchiario@tenaska.com); Pitts, Jarrod <[JPitts@TENASKA.com](mailto:JPitts@TENASKA.com)>  
**Subject:** Project Introduction - Crane and Sandhill BESS Projects

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Good afternoon,

Crane Energy Storage LLC (Crane Storage) and Sandhill Energy Storage LLC (Sandhill Storage), wholly owned subsidiaries of Copenhagen Infrastructure Partners (CIP), propose to construct the Crane Battery Energy Storage System (BESS) Project (Crane Project) and the Sandhill BESS Project (Sandhill Project), collectively the Projects, adjacent to one another in Township 107N, Range 15W, Sections 30 and 31, in Olmsted County, Minnesota. Both Projects are being developed by Tenaska, Inc. (Tenaska) on behalf of CIP. The Projects require Site Permits from the Minnesota Public Utilities Commission (Commission). Crane Storage and Sandhill Storage intend to file a Joint Site Permit Application (Application) with the Commission in the first quarter of 2025.

The attached letter provides additional information about the Projects, an overview map of their



location, and contact information for Tenaska. We welcome any comments your agency may have at this time and throughout the Commission's application review process. Any written agency comments provided in response to this letter will be incorporated into the Commission's review process.

Regards,

**Monika H. Davis (she/her)**  
**Senior Project Manager**

612.924.3988 direct

612.600.8010 mobile

[monika.davis@merjent.com](mailto:monika.davis@merjent.com)



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Minneapolis, MN 55414

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~~~~~



October 29, 2024

Leonard Wabasha  
Shakopee Mdewakanton Sioux (Dakota) Community  
Tribal Historic Preservation Officer  
2330 Sioux Trail NW  
Prior Lake, MN 55372  
[leonard.wabasha@shakopeedakota.org](mailto:leonard.wabasha@shakopeedakota.org)

**RE: Crane and Sandhill Battery Energy Storage Projects in Olmsted County, Minnesota**

Crane Energy Storage LLC (Crane Storage) and Sandhill Energy Storage LLC (Sandhill Storage), wholly owned subsidiaries of Copenhagen Infrastructure Partners (CIP), propose to construct the Crane Battery Energy Storage System (BESS) Project (Crane Project) and the Sandhill BESS Project (Sandhill Project), collectively the Projects, adjacent to one another in Township 107N, Range 15W, Sections 30 and 31, in Olmsted County, Minnesota. Each BESS will charge its batteries with energy from the electric transmission grid, when excess power is available, via the Point of Interconnection (POI) at Southwest Minnesota Municipal Power Agency's Byron Substation, store that energy on site, and later deliver that energy back to the transmission grid through the same POI, when it is needed. These Projects will aid the region's ongoing transition to renewables, ensure reliable electric service in the area, provide significant economic benefits to local residents, and help Minnesota achieve its clean energy goals.

The Crane Project and Sandhill Project will each be able to store a maximum of 800 megawatt hours (MWh) of electricity at a given time, with a maximum injection capacity of 200 MW into the electric transmission grid. In addition, Crane Storage and Sandhill Storage are proposing to construct collector substations adjacent to the BESS and an approximately 500-foot-long 161 kilovolt (kV) generation-tie (gen-tie) line that will be shared by the two projects to interconnect to the existing Byron Substation, the POI for both projects. An overview map of the Projects is enclosed.

The Projects require Site Permits from the Minnesota Public Utilities Commission (Commission). Crane and Sandhill intend to file a Joint Site Permit Application (Application) with the Commission in the first quarter of 2025. Pending receipt of all required permits and approvals, construction of the Projects is anticipated to begin in the first quarter of 2027, with commercial operation by the second quarter of 2028. Construction of the Projects may be staggered so that one project would begin commercial operation before the other.



We welcome any comments your agency may have at this time and throughout the Commission's application review process. Any written agency comments provided in response to this letter will be incorporated into the Commission's review process. If you have questions and would like additional information about the proposed Projects, or if you have any information we should consider evaluating, please contact me at [jfinocchi@tenaska.com](mailto:jfinocchi@tenaska.com) or (402) 691-9577.

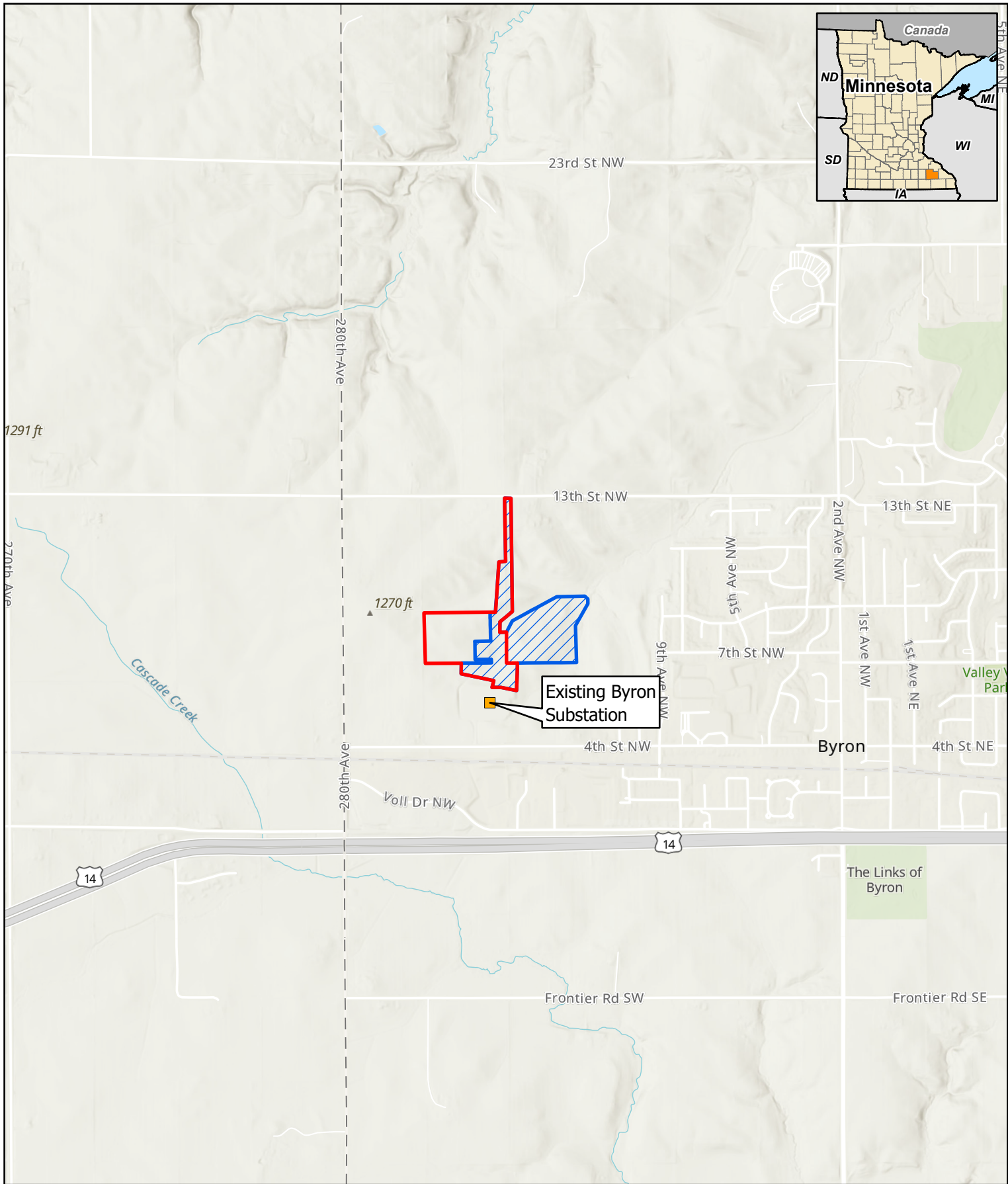
Sincerely,

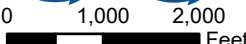





Joseph M. Finocchiaro  
Crane Energy Storage LLC  
Sandhill Energy Storage LLC  
c/o Tenaska, Inc.  
14302 FNB Parkway  
Omaha, NE 68154  
Phone: (402) 691-9577  
Email: [jfinocchi@tenaska.com](mailto:jfinocchi@tenaska.com)

Enclosure: Project Overview Map




Cc: Jarrod Pitts, Tenaska, Inc.  
James Hingston, Tenaska, Inc.  
Jeremy Duehr, Fredrikson & Byron  
Monika H. Davis, Merjent, Inc.





1 inch = 2,000 feet  
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**Project Overview Map**  
**Crane and Sandhill Projects**  
**Crane Energy Storage, LLC and**  
**Sandhill Energy Storage, LLC**  
**Olmsted County, Minnesota**

-  Crane Project
-  Sandhill Project
-  Existing Substation

## **STATE AGENCIES**

**From:** [Kirsch, Raymond \(COMM\)](#)  
**To:** [Monika Davis](#)  
**Cc:** [Kirsch, Raymond \(COMM\)](#)  
**Subject:** EXTERNAL: RE: Project Introduction - Crane and Sandhill BESS Projects  
**Date:** Tuesday, October 29, 2024 5:19:04 PM  
**Attachments:** [image002.png](#)  
[image003.png](#)

---

**CAUTION:** This email originated from outside of Merjent.

Monika,

Good day. Thanks for this project info. We (EERA) would like to review a draft application when you reach this point in your application development.

Best regards,

Ray

Ray Kirsch  
Energy Environmental Review and Analysis  
651-539-1841  
[mn.gov/commerce/energyfacilities](https://mn.gov/commerce/energyfacilities)  
Minnesota Department of Commerce  
85 7th Place East, Suite 280 | Saint Paul, MN 55101



---

**From:** Monika Davis <monika.davis@merjent.com>  
**Sent:** Tuesday, October 29, 2024 4:31 PM  
**To:** Kirsch, Raymond (COMM) <raymond.kirsch@state.mn.us>  
**Cc:** jfinocchiario@tenaska.com; Pitts, Jarrod <JPitts@TENASKA.com>  
**Subject:** Project Introduction - Crane and Sandhill BESS Projects

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Good afternoon,

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The attached letter provides additional information about the Projects, an overview map of their location, and contact information for Tenaska. We welcome any comments your agency may have at this time and throughout the Commission's application review process. Any written agency comments provided in response to this letter will be incorporated into the Commission's review process.

Regards,

**Monika H. Davis (she/her)**  
**Senior Project Manager**

612.924.3988 direct

612.600.8010 mobile

[monika.davis@merjent.com](mailto:monika.davis@merjent.com)



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October 29, 2024

Raymond Kirsch  
Minnesota Department of Commerce  
Energy Facility Permitting  
85 7th Place East  
Suite 500  
St. Paul, MN 55101-2198  
raymond.kirsch@state.mn.us

**RE: Crane and Sandhill Battery Energy Storage Projects in Olmsted County, Minnesota**

Crane Energy Storage LLC (Crane Storage) and Sandhill Energy Storage LLC (Sandhill Storage), wholly owned subsidiaries of Copenhagen Infrastructure Partners (CIP), propose to construct the Crane Battery Energy Storage System (BESS) Project (Crane Project) and the Sandhill BESS Project (Sandhill Project), collectively the Projects, adjacent to one another in Township 107N, Range 15W, Sections 30 and 31, in Olmsted County, Minnesota. Each BESS will charge its batteries with energy from the electric transmission grid, when excess power is available, via the Point of Interconnection (POI) at Southwest Minnesota Municipal Power Agency's Byron Substation, store that energy on site, and later deliver that energy back to the transmission grid through the same POI, when it is needed. These Projects will aid the region's ongoing transition to renewables, ensure reliable electric service in the area, provide significant economic benefits to local residents, and help Minnesota achieve its clean energy goals.

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Sincerely,

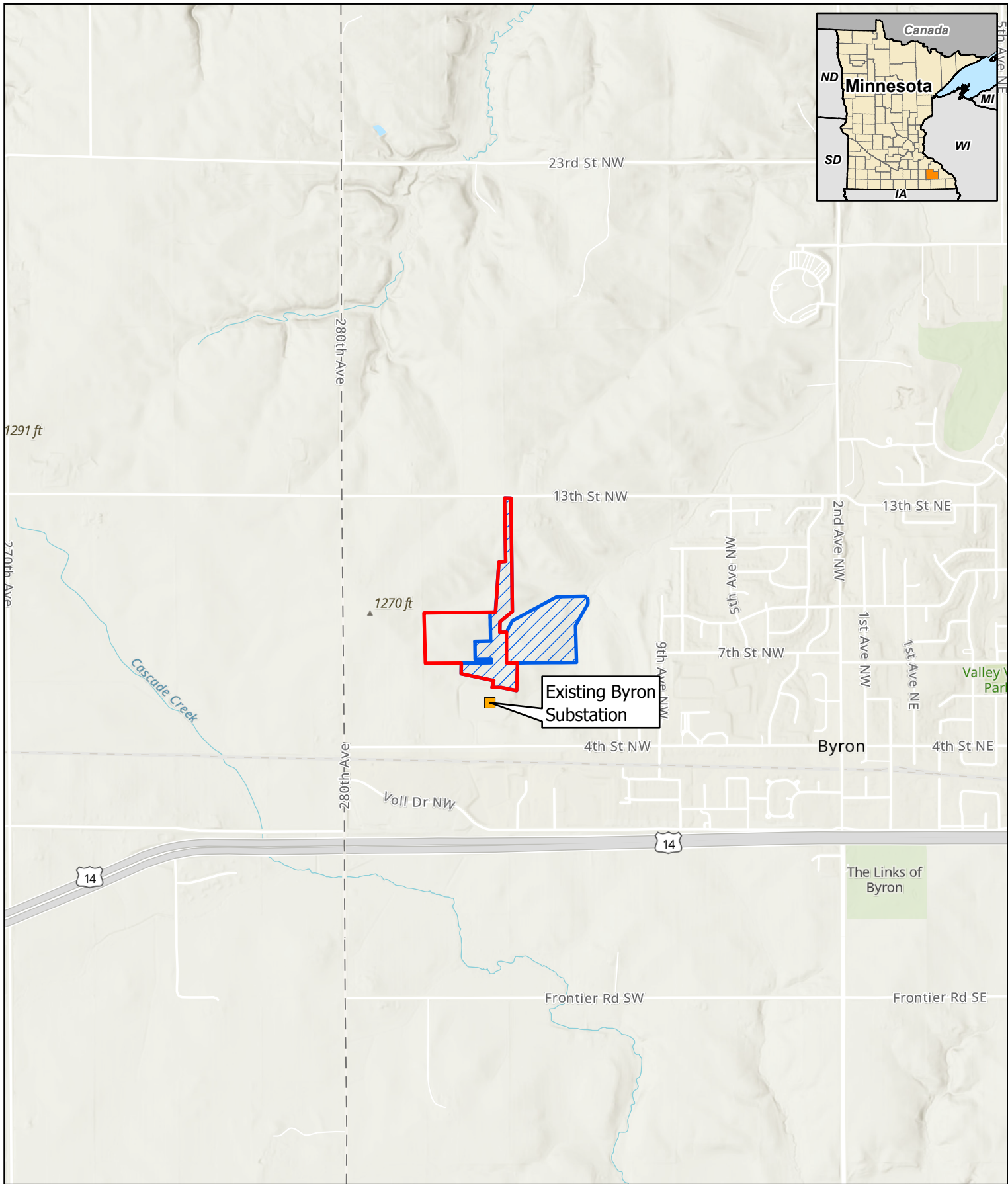





Joseph M. Finocchiaro  
Crane Energy Storage LLC  
Sandhill Energy Storage LLC  
c/o Tenaska, Inc.  
14302 FNB Parkway  
Omaha, NE 68154  
Phone: (402) 691-9577  
Email: [jfinocchi@tenaska.com](mailto:jfinocchi@tenaska.com)

Enclosure: Project Overview Map

Cc: Jarrod Pitts, Tenaska, Inc.  
James Hingston, Tenaska, Inc.  
Jeremy Duehr, Fredrikson & Byron  
Monika H. Davis, Merjent, Inc.










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**Project Overview Map**  
**Crane and Sandhill Projects**  
**Crane Energy Storage, LLC and**  
**Sandhill Energy Storage, LLC**  
**Olmsted County, Minnesota**

-  Crane Project
-  Sandhill Project
-  Existing Substation



**From:** [Chesnut, Jed \(BWSR\)](#)  
**To:** [Monika Davis](#)  
**Subject:** EXTERNAL: RE: Project Introduction - Crane and Sandhill BESS Projects  
**Date:** Tuesday, November 19, 2024 6:36:15 AM  
**Attachments:** [image002.png](#)  
[image003.png](#)  
[Wetland WCA MN joint appl form Sept 2024 0.docx](#)

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Monika,

The BESS projects will need to comply with the standards and requirements of the Minnesota Wetland Conservation Act. If impacts to wetlands are proposed, the applicant will need to submit the Minnesota Joint Application for Activities Affecting Water Resources to the Local Government Unit; either City of Byron or Olmstead County Soil and Water Conservation District, depending on project location. I have attached the Joint Application for your reference.

Please let me know if you have any additional questions. Thank you,

**Jed Chesnut | Wetland Specialist**

Minnesota Board of Water and Soil Resources  
520 Lafayette Road North | St. Paul, MN | 55155  
Phone: 651-286-9334  
[jed.chesnut@state.mn.us](mailto:jed.chesnut@state.mn.us) | [www.bwsr.state.mn.us](http://www.bwsr.state.mn.us)



---

**From:** Monika Davis <[monika.davis@merjent.com](mailto:monika.davis@merjent.com)>  
**Sent:** Tuesday, October 29, 2024 4:38 PM  
**To:** Chesnut, Jed (BWSR) <[Jed.Chesnut@state.mn.us](mailto:Jed.Chesnut@state.mn.us)>  
**Cc:** [jfinocchiario@tenaska.com](mailto:jfinocchiario@tenaska.com); Pitts, Jarrod <[JPitts@TENASKA.com](mailto:JPitts@TENASKA.com)>  
**Subject:** Project Introduction - Crane and Sandhill BESS Projects

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Regards,

**Monika H. Davis (she/her)**  
**Senior Project Manager**

612.924.3988 direct

612.600.8010 mobile

[monika.davis@merjent.com](mailto:monika.davis@merjent.com)



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October 29, 2024

Jed Chesnut  
Minnesota Board of Water and Soil Resources  
Central Office; Wetland Specialist  
520 Lafayette Road North  
St. Paul, MN 55155  
jed.chesnut@state.mn.us

**RE: Crane and Sandhill Battery Energy Storage Projects in Olmsted County, Minnesota**

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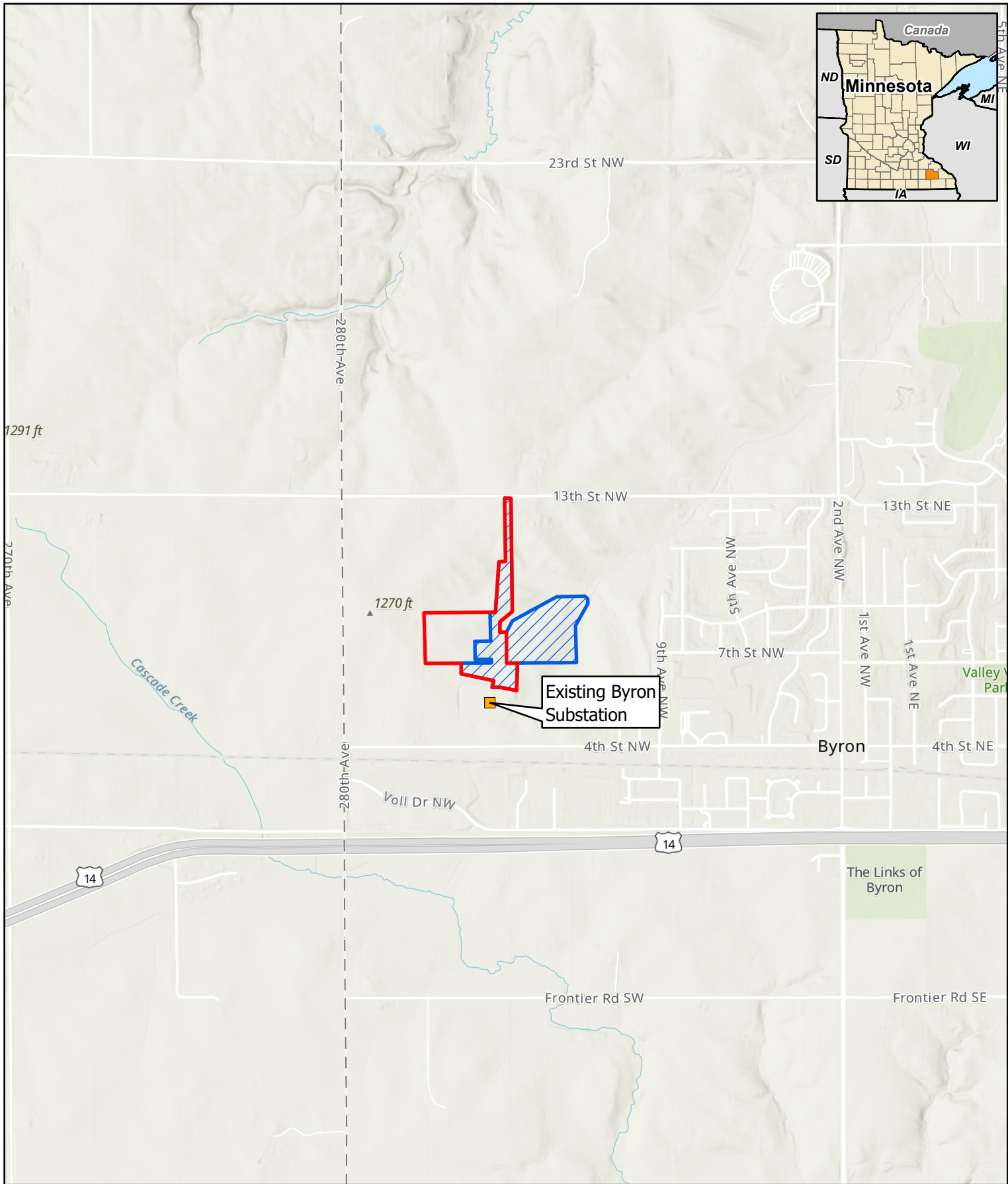
Sincerely,

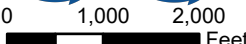





Joseph M. Finocchiaro  
Crane Energy Storage LLC  
Sandhill Energy Storage LLC  
c/o Tenaska, Inc.  
14302 FNB Parkway  
Omaha, NE 68154  
Phone: (402) 691-9577  
Email: [jfinocchi@tenaska.com](mailto:jfinocchi@tenaska.com)

Enclosure: Project Overview Map




Cc: Jarrod Pitts, Tenaska, Inc.  
James Hingston, Tenaska, Inc.  
Jeremy Duehr, Fredrikson & Byron  
Monika H. Davis, Merjent, Inc.





1 inch = 2,000 feet  
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**Crane and Sandhill Projects**  
**Crane Energy Storage, LLC and**  
**Sandhill Energy Storage, LLC**  
**Olmsted County, Minnesota**

-  Crane Project
-  Sandhill Project
-  Existing Substation

**From:** [Monika Davis](#)  
**To:** [Kotch Egstad, Stacy \(DOT\)](#)  
**Cc:** [jfinocchiario@tenaska.com](mailto:jfinocchiario@tenaska.com); [JPitts@TENASKA.com](mailto:JPitts@TENASKA.com)  
**Subject:** RE: EXTERNAL: RE: Project Introduction - Crane and Sandhill BESS Projects  
**Date:** Wednesday, October 30, 2024 12:04:00 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[Crane\\_Sandhill\\_Land\\_Control\\_Areas.zip](#)

---

Good afternoon, Stacy.

Nice to meet you and thank you for your quick response. Attached are shapefiles of the Land Control Areas (i.e., project boundaries) of the Crane and Sandhill BESS Projects. These are the same areas shown on the map provided with the project notification letter. The Projects will be accessed from 13<sup>th</sup> Street NW, north of the sites, and no impacts to trunk highway ROW are anticipated. If you have any additional questions about these projects, don't hesitate to reach out.

We look forward to coordinating with MnDOT during the MPUC review proceedings.

Have a great rest of your day!

**Monika H. Davis (she/her)**  
**Senior Project Manager**  
612.924.3988 direct  
612.600.8010 mobile  
[monika.davis@merjent.com](mailto:monika.davis@merjent.com)



1 Main Street SE, Suite 300  
Minneapolis, MN 55414  
612.746.3660  
[www.merjent.com](http://www.merjent.com)

---

**From:** Kotch Egstad, Stacy (DOT) <[stacy.kotch@state.mn.us](mailto:stacy.kotch@state.mn.us)>  
**Sent:** Wednesday, October 30, 2024 9:10 AM  
**To:** Monika Davis <[monika.davis@merjent.com](mailto:monika.davis@merjent.com)>  
**Cc:** [jfinocchiario@tenaska.com](mailto:jfinocchiario@tenaska.com); [JPitts@TENASKA.com](mailto:JPitts@TENASKA.com)  
**Subject:** EXTERNAL: RE: Project Introduction - Crane and Sandhill BESS Projects

**CAUTION:** This email originated from outside of Merjent.

Good Morning Monika,

I'd like to introduce myself as your MnDOT point of contact for your Crane and Sandhill BESS Projects.

You would coordinate directly with me throughout the MPUC process and, if deemed necessary, any Project review and downstream permitting preparations.

If available, I am interested in seeing a shapefile of the proposed Projects so that I may perform an initial screening of any perceived or actual impacts in our ArcGIS systems. While your Projects do not look to have direct impacts to our trunk highway right-of-way, I'd like to confirm as much.

Thank you for contacting MnDOT and initiating early Project review coordination,

**Stacy Kotch Egstad**

Utility Routing & Siting Coordinator | Office of Land Management

**Minnesota Department of Transportation**

395 John Ireland Blvd Mailstop 678

St. Paul, MN. 55155

651-358-0786

[Large Energy Facility Project Guidance - MnDOT \(state.mn.us\)](https://state.mn.us/large-energy-facility-project-guidance)



---

**From:** Monika Davis <[monika.davis@merjent.com](mailto:monika.davis@merjent.com)>

**Sent:** Tuesday, October 29, 2024 4:39 PM

**To:** Pignato, Joseph (DOT) <[joseph.pignato@state.mn.us](mailto:joseph.pignato@state.mn.us)>

**Cc:** [jfinocchiario@tenaska.com](mailto:jfinocchiario@tenaska.com); Pitts, Jarrod <[JPitts@TENASKA.com](mailto:JPitts@TENASKA.com)>

**Subject:** Project Introduction - Crane and Sandhill BESS Projects

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---

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Regards,

**Monika H. Davis (she/her)**  
**Senior Project Manager**

612.924.3988 direct

612.600.8010 mobile

[monika.davis@merjent.com](mailto:monika.davis@merjent.com)



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October 29, 2024

Joe Pignato, Land Management Office Director  
Minnesota Department of Transportation  
Office of Land Management  
395 John Ireland Blvd  
Mailstop 630  
St. Paul, MN 55155-1800  
joseph.pignato@state.mn.us

**RE: Crane and Sandhill Battery Energy Storage Projects in Olmsted County, Minnesota**

Crane Energy Storage LLC (Crane Storage) and Sandhill Energy Storage LLC (Sandhill Storage), wholly owned subsidiaries of Copenhagen Infrastructure Partners (CIP), propose to construct the Crane Battery Energy Storage System (BESS) Project (Crane Project) and the Sandhill BESS Project (Sandhill Project), collectively the Projects, adjacent to one another in Township 107N, Range 15W, Sections 30 and 31, in Olmsted County, Minnesota. Each BESS will charge its batteries with energy from the electric transmission grid, when excess power is available, via the Point of Interconnection (POI) at Southwest Minnesota Municipal Power Agency's Byron Substation, store that energy on site, and later deliver that energy back to the transmission grid through the same POI, when it is needed. These Projects will aid the region's ongoing transition to renewables, ensure reliable electric service in the area, provide significant economic benefits to local residents, and help Minnesota achieve its clean energy goals.

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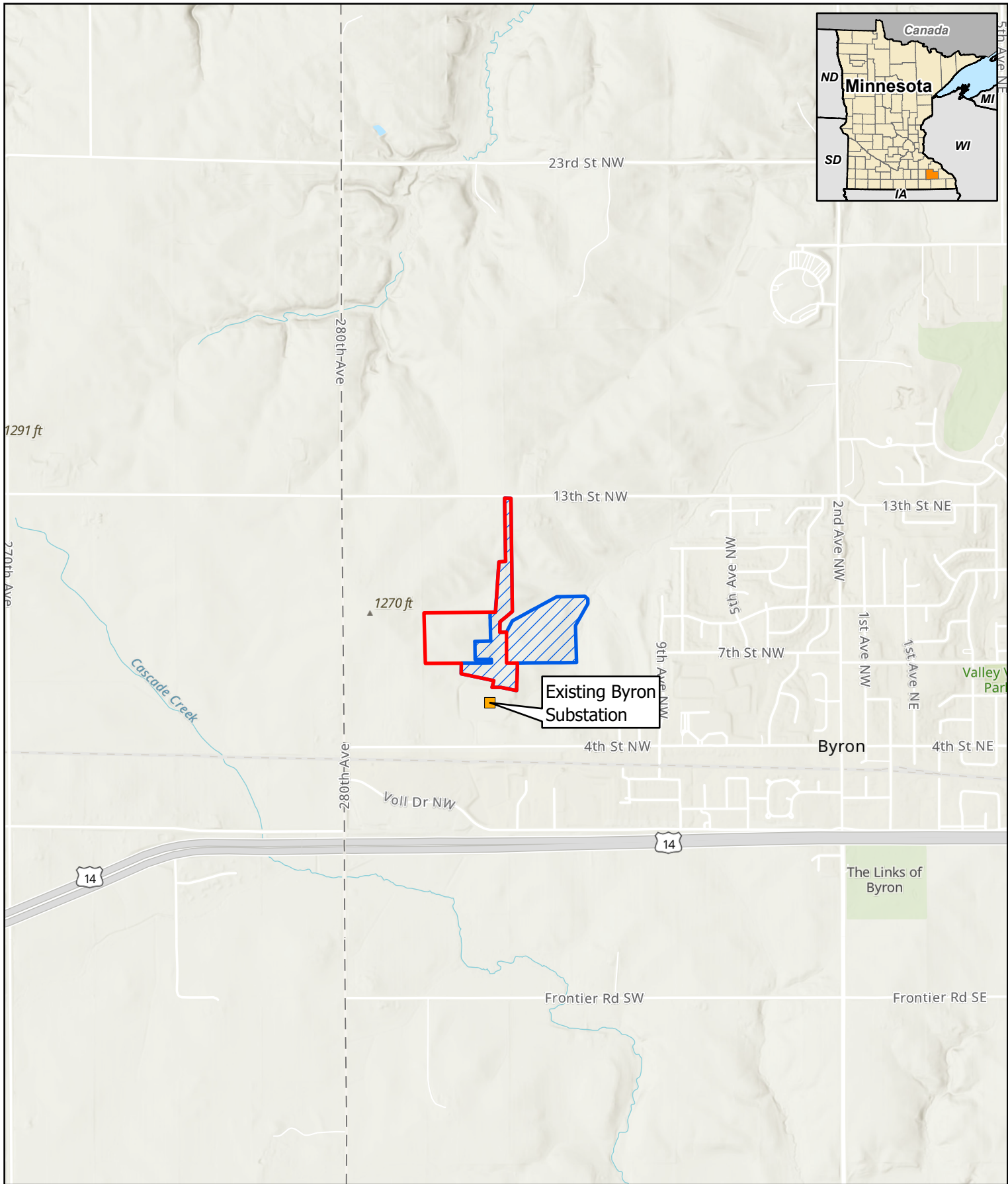
Sincerely,

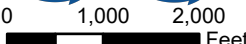





Joseph M. Finocchiaro  
Crane Energy Storage LLC  
Sandhill Energy Storage LLC  
c/o Tenaska, Inc.  
14302 FNB Parkway  
Omaha, NE 68154  
Phone: (402) 691-9577  
Email: [jfinocchi@tenaska.com](mailto:jfinocchi@tenaska.com)

Enclosure: Project Overview Map




Cc: Jarrod Pitts, Tenaska, Inc.  
James Hingston, Tenaska, Inc.  
Jeremy Duehr, Fredrikson & Byron  
Monika H. Davis, Merjent, Inc.





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**Project Overview Map**  
**Crane and Sandhill Projects**  
**Crane Energy Storage, LLC and**  
**Sandhill Energy Storage, LLC**  
**Olmsted County, Minnesota**

-  Crane Project
-  Sandhill Project
-  Existing Substation

**From:** [Donovan, Martin \(DNR\)](#)  
**To:** [Monika Davis](#)  
**Cc:** [jfinocchiario@tenaska.com](mailto:jfinocchiario@tenaska.com); [Pitts, Jarrod](#)  
**Subject:** EXTERNAL: RE: Project Introduction - Crane and Sandhill BESS Projects  
**Date:** Wednesday, October 30, 2024 8:57:36 AM  
**Attachments:** [image001.png](#)

---

**CAUTION:** This email originated from outside of Merjent.

Good morning,

Thank you for sending me the project introduction letter. I have forwarded the letter along to Melissa Collins and will follow up if she has comments. We appreciate you engaging with the Minnesota DNR in the early coordination process.

Best,  
Martin

---

**From:** Monika Davis <monika.davis@merjent.com>  
**Sent:** Tuesday, October 29, 2024 4:39 PM  
**To:** Donovan, Martin (DNR) <Martin.Donovan@state.mn.us>  
**Cc:** [jfinocchiario@tenaska.com](mailto:jfinocchiario@tenaska.com); [Pitts, Jarrod <JPitts@TENASKA.com>](mailto:JPitts@TENASKA.com)  
**Subject:** Project Introduction - Crane and Sandhill BESS Projects

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**Monika H. Davis (she/her)**  
**Senior Project Manager**

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October 29, 2024

Martin Donovan

Minnesota Department of Natural Resources, Energy Projects, Planners Office

Environmental Review Coordinator

500 Lafayette Road

Box 25

St. Paul, MN 55155

[martin.donovan@state.mn.us](mailto:martin.donovan@state.mn.us)

**RE: Crane and Sandhill Battery Energy Storage Projects in Olmsted County, Minnesota**

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Sincerely,

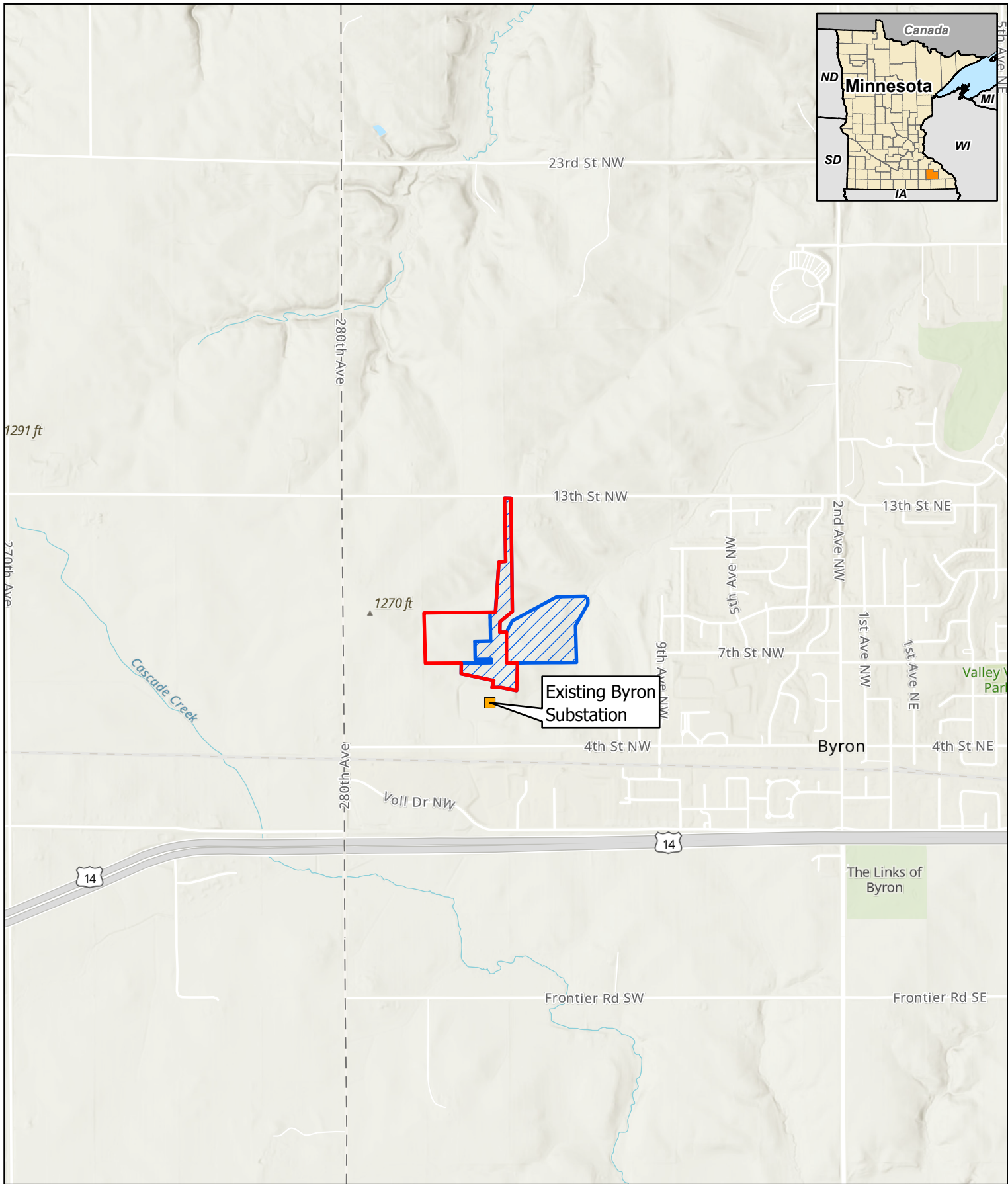
A handwritten signature in blue ink, appearing to read 'J. Finocchiaro', with a stylized flourish at the end.



Joseph M. Finocchiaro  
Crane Energy Storage LLC  
Sandhill Energy Storage LLC  
c/o Tenaska, Inc.  
14302 FNB Parkway  
Omaha, NE 68154  
Phone: (402) 691-9577  
Email: [jfinocchi@tenaska.com](mailto:jfinocchi@tenaska.com)


Enclosure: Project Overview Map

Cc: Jarrod Pitts, Tenaska, Inc.  
James Hingston, Tenaska, Inc.  
Jeremy Duehr, Fredrikson & Byron  
Monika H. Davis, Merjent, Inc.












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**Crane Energy Storage, LLC and**  
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-  Crane Project
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-  Existing Substation



**From:** [Service, Customer \(DEED\)](#)  
**To:** [Monika Davis](#); [Service, Customer \(DEED\)](#)  
**Cc:** [jfinocchiario@tenaska.com](mailto:jfinocchiario@tenaska.com); [Pitts, Jarrod](#)  
**Subject:** EXTERNAL: RE: Project Introduction - Crane and Sandhill BESS Projects  
**Date:** Wednesday, October 30, 2024 8:02:46 AM  
**Attachments:** [image002.png](#)  
[image003.png](#)  
[image004.png](#)

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**CAUTION:** This email originated from outside of Merjent.

Good Morning Monika,

This inbox is monitored by the Department of Employment and Economic Development (DEED). Based on your email, it appears you may have been trying to reach the Minnesota Public Utilities Commission. Their contact information is screenshotted below:

## Minnesota Public Utilities Commission

121 7th Place E

Suite 350

Saint Paul, Minnesota 55101

**Local:** 651.296.0406 | **Toll Free:** 1.800.657.3782

[consumer.puc@state.mn.us](mailto:consumer.puc@state.mn.us)

[Get directions](#)

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If I am incorrect and you did intend to reach DEED, please clarify which department within DEED you are intending this information for and we can assist with forwarding your message.

Thank you,

**Ciera**

**MA2|Business Operations Support Specialist**

*Department of Employment and Economic Development*

*Great Northern Building, 180 E 5th Street, Suite 12108 St. Paul, MN 55101*

Direct: 651-259-7114 (DEED Main Line)

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---

**From:** Monika Davis <monika.davis@merjent.com>

**Sent:** Tuesday, October 29, 2024 4:42 PM

**To:** Service, Customer (DEED) <deed.customerservice@state.mn.us>

**Cc:** jfinocchiario@tenaska.com; Pitts, Jarrod <JPitts@TENASKA.com>

**Subject:** Project Introduction - Crane and Sandhill BESS Projects

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October 29, 2024

Minnesota Department of Employment and Economic Development  
DEED Headquarters  
Great Northern Building  
180 E 5th St., Suite 1200  
St. Paul, MN 55101  
DEED.CustomerService@state.mn.us

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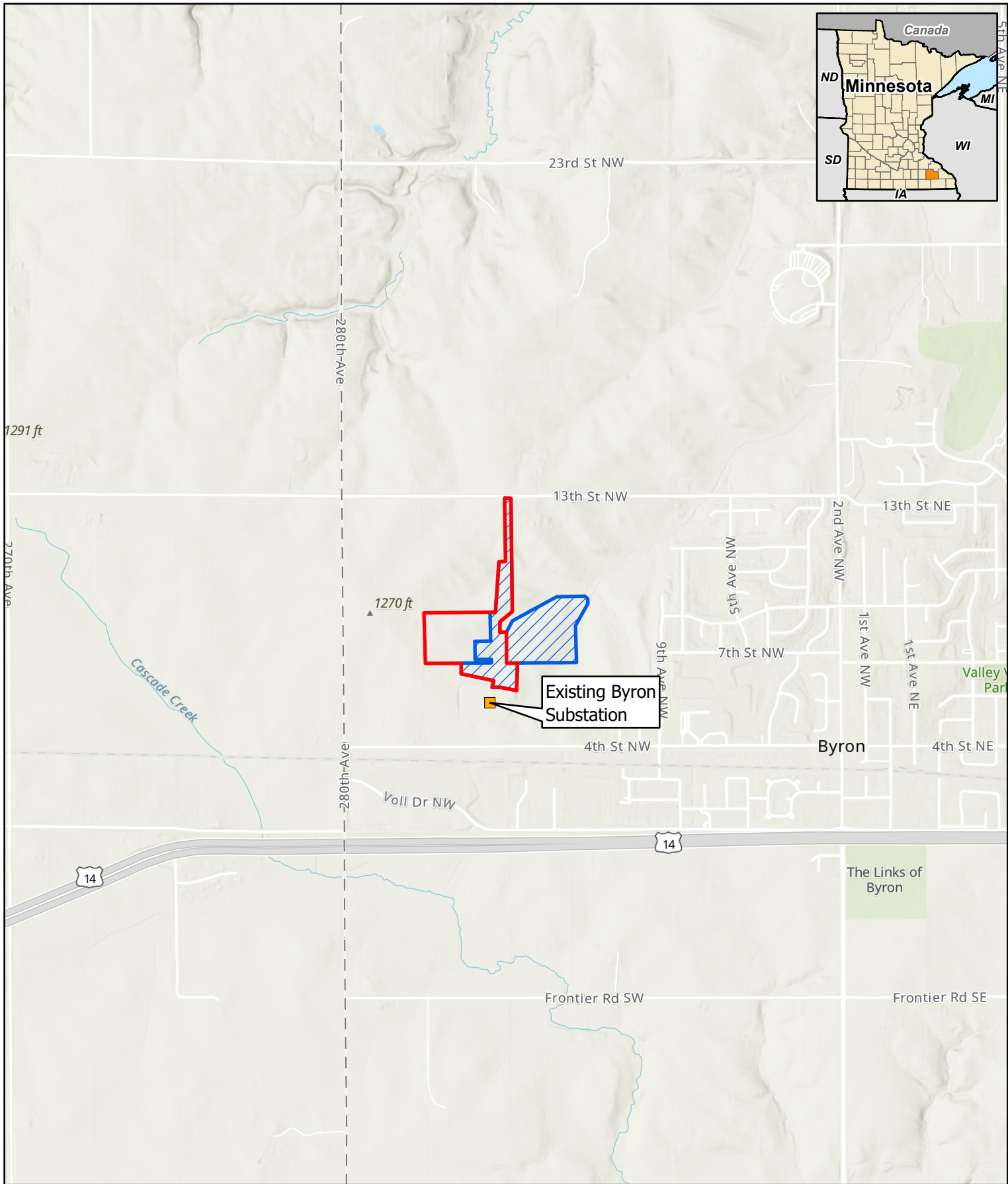
Sincerely,



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Joseph M. Finocchiaro  
Crane Energy Storage LLC  
Sandhill Energy Storage LLC  
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14302 FNB Parkway  
Omaha, NE 68154  
Phone: (402) 691-9577  
Email: [jfinocchi@tenaska.com](mailto:jfinocchi@tenaska.com)

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Cc: Jarrod Pitts, Tenaska, Inc.  
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1 inch = 2,000 feet

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**Olmsted County, Minnesota**

-  Crane Project
-  Sandhill Project
-  Existing Substation

## Crane and Sandhill Battery Energy Storage System Projects

### Introductory Call with the Minnesota Department of Natural Resources (MDNR)

#### Attendees:

- Minnesota Department of Natural Resources:
  - Melissa Collins, Regional Environmental Assessment Ecologist
  - Martin Donovan, Energy Planner
- Tenaska:
  - Jarrod Pitts, Tenaska, **Lead Developer**
  - Joe Finocchiaro, Tenaska, Senior Director Environmental Programs
  - Fred Strauss, Tenaska, Director Environmental Programs
- James Hingston, Tenaska, **Developer**
- Merjent
  - Monika Davis, Environmental Subcontractor
- Fredrikson & Byron
  - Jeremy Duehr, Legal Counsel

#### Introductions

#### Project descriptions

- The Projects will help to meet increased demand for electricity; battery storage helps with addressing times of peak demand and integrating renewables to the grid.
- Footprint of these projects is much smaller than a wind or solar farm.
- These projects may support other planned renewable energy projects in the area.
- Projects sites are primarily row-crops –some young trees and shrubs on site periphery.
- Wetland delineation completed and projects designed to avoid wetland impacts.
- State and federal database review results:
  - Federal: Whooping Crane experimental population, Monarch candidate, Prairie Bush Clover, threatened. Initial Dkey run result was no effect.
  - MCE results: Loggerhead shrike. No MBS, NPCs, calcareous fens, no bat HCP features. Needs further review for state-listed species.
  - In-field survey noted low to no potential for occurrence of state and federally listed species or migratory birds.
- Field surveys completed – cultural, w/w delineation, ecological survey

#### Discussion:

- **Melissa:** Any future plans to develop wind/solar to feed into these BESS?
  - **Jarrod:** No, not at this time. Aware of other wind/solar projects being developed by others in the area that may benefit from these projects.
- **Melissa:** types of BESS technology?
  - **Jarrod:** Projects will use lithium ion technology. Committed to using the safest tech on the market. LSP will be used for these projects.
- **Melissa:** Are there any images of how this will look on the landscape?

- **Jarrold:** Can provide site layouts and renderings of how the projects will look. Projects will include 6 ft fencing, battery enclosures (10 ft high, 8 ft wide, 10-30 ft long). Enclosures connected via underground collection lines, access roads throughout the site. Coordinating with local fire and emergency response. Collector sub on site will step up voltage to 161 kV, gen-tie to connect to existing Byron Substation.
- **Melissa:** Area is prone to karst. Want to understand depth of footings. Also, is cooling an issue? Need for water appropriation? Need a well?
  - **Jarrold:** HVAC system does not require water. Not anticipated that water appropriation will be needed. Designing to fire safety standard – requirement for some water supply for emergency response. Projects will either connect to local water system or have tanks on site. Most likely to connect with City of Byron system; working on this agreement now. If not able to connect to City of Byron system, would have onsite tank or well.
- **Melissa:** Do you have formal MCE response?
  - **Monika:** Not yet but will submit and summarize results in the Joint Application.
- **Melissa:** Will coordinate with species folks and may have questions about fencing. Entrapment can be a concern. Avoid barbed wire on top of fence.
  - **Fred and Jarrold:** shared kmz of latest design, demonstrating that the footprint is much smaller than the parcel boundary shown in the PPT and projects are about 0.5 mile north of Highway 14.
- **Melissa:** Smaller scale than she was anticipating . Recommends submitting formal MCE. About 6 weeks for response from MDNR. Could have an automated response unless further review is needed.



# Meeting with Minnesota Department of Agriculture (MDA)

Date: November 7, 2024

Attendees:

- Steve Roos, MDA
- Tenaska: Joe Finocchiaro, Jarrod Pitts, Tyler Clark
- Fredrikson & Byron: Jeremy Duehr
- Merjent: Monika Davis

Topics:

Introductions

Introduction to the Projects and to Tenaska in general

- Typical industrial use, but sited in ag land north of the existing substation due to siting constraints

MDA Comments:

- Outside municipal boundary, but within two mile buffer area around Byron that the city has rights to develop, if they choose to annex that land.
- Within the this two mile buffer, MDA expects these areas to get developed eventually. This affects how they approach projects like these.
- BESS projects seem more like light industrial projects than a solar/wind development.
- Has Tenaska asked Byron whether they would annex the Projects into the municipal boundary? MPUC may ask about this.
- MDA is concerned about potential impacts on existing drainage systems which are not always parcel specific.
- Soil – they care about temporary uses and the potential impacts on soils. Would want soils restored for ag use if projects are temporary.

Jeremy Response:

- Due to the term of the site permits from MPUC, applicants have to contemplate decommissioning projects when the site permit term expires.
- Tenaska is actively coordinating with the Town of Byron. Joint application considers municipal planning, as well. No immediate plans for annexing these projects have been identified at this time.
- There are BMPs proposed for mitigation/minimizing impacts on soils and ag land, but not in a separate AIMP.
- We could consolidate all of those BMPs in one place in the application.
- Projects will have docket numbers soon.

MDA Additional Comments:

- Because these projects are so close to a municipal boundary and because they have to contemplate removal of the projects at the end of the site term, Steve thinks consolidating BMPs in one place in the application could be reasonable.
- Steve wants to hear about Byron's long-term goals for the surrounding planning area (two-mile buffer) and thinks MPUC will too.
- Or, maybe a bullet list of remediations, fleshed out in a more succinct AIMP attached to the site permit.
- Steve can submit a letter noting MDA's coordination with the Applicants regarding ag impact mitigation.
- However, development within the two mile planning area is more likely than not to be annexed eventually.
- Steve would like to be notified after Joint Application is submitted, so he can provide a letter response. MDA tried to provide fair assessments and apply rules consistently across all projects.

February 3, 2025

Rachel Klabacka William  
Staff Archaeologist, PI  
TRC  
[RKlabacka@trccompanies.com](mailto:RKlabacka@trccompanies.com)

RE: Crane and Sandhill Battery Energy Storage System Project  
T107 R15 S30 & S31, Olmsted County  
SHPO Number: 2025-0127

Dear Rachel Klabacka William:

Thank you for continuing consultation on the above referenced project. We understand that this project will require a Minnesota Public Utilities Commission site permit, and therefore, information received on December 19, 2024, has been reviewed pursuant to the responsibilities given the State Historic Preservation Office by the Minnesota Historic Sites Act (138.665-666). If this project will be located on non-federal public land, the project will also be subject to review under the Minnesota Field Archaeology Act (138.40).

We have reviewed the cultural resources survey report, *Phase I Archaeological Reconnaissance, Crane and Sandhill BESS Project, in Kalmar Township, Olmsted County, Minnesota, SHPO No 2025-0127* (December 2024, TRC) that was prepared for this project. Based on the results of the survey, we have determined that no significant archaeological sites will be affected by this project and that there are **no properties** listed in the National or State Registers of Historic Places, or within the Historic Sites Network, that will be affected by this project.

Please note that this comment letter does not address the requirements of Section 106 of the National Historic Preservation Act of 1966 and 36 CFR § 800. If this project is considered for federal financial assistance, or requires a federal permit or license, then review and consultation with our office will need to be initiated by the lead federal agency. Be advised that comments and recommendations provided by our office for this state-level review may differ from findings and determinations made by the federal agency as part of review and consultation under Section 106.

If you have any questions regarding our review of this project, please contact Kelly Gragg-Johnson, Environmental Review Specialist, at 651-201-3285 or [kelly.graggjohnson@state.mn.us](mailto:kelly.graggjohnson@state.mn.us).

Sincerely,



Amy Spong  
Deputy State Historic Preservation Officer