



May 7, 2026

VIA E-FILING

Honorable Sasha Bergman
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place E, Suite 350
Saint Paul, MN 55101-214

Re: In the Matter of a Possible Rulemaking to Amend Minnesota Rules, Chapters 7849 and 7850, MPUC Docket No. E999/R-26-172

Dear Ms. Bergman:

The Geronimo Power respectfully submit these Reply Comments in response to the Notice of Comment Period issued by the Minnesota Public Utilities Commission on April 16th, 2026, and certain comments filed by parties on April 30th, 2026.

These reply comments have been e-filed through www.edocket.state.mn.us. A copy of this filing is also being served upon the persons on the Official Service List of record.

Please let me know if you have any questions regarding this filing.

Sincerely,

s/ Alex Cutchey

Alex Cutchey, #0504911
Senior Manager Policy – Midwest
Geronimo Power, LLC
8400 Normandale Lake Blvd
Bloomington, MN 55437
(612) 532-1565
Acutchey@geronimopower.com

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

Katie J. Sieben	Chair
Hwikwon Ham	Commissioner
Audrey Partridge	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

In the Matter of a Possible Rulemaking to Amend Minnesota Rules, Chapters 7849 and 7850 Docket No. E-999/R-26-172

REPLY COMMENTS OF GERONIMO POWER, LLC

INTRODUCTION

Geronimo Power, LLC (“Geronimo”) submits these Reply Comments in response to the initial comments filed in this docket on April 30, 2026, by the Minnesota Transmission Owners (“MTO”) and Ms. Carol Overland (“Legalelectric”) in Response to the Commission’s April 16th, 2026 Notice of comment Period in this docket. Geronimo is a renewable energy developer with active projects in Minnesota. Geronimo writes to add the perspective of a generation developer — a stakeholder not represented in the initial comment record — and to express support for the utilities’ core position opposing a stay and limiting any rulemaking to targeted necessary amendments if the Commission determines such amendments are necessary.

DISCUSSION

The initial comments of the MTO correctly identify the dispositive issues in this docket. The Commission should deny Ms. Overland’s request for a stay of all pending proceedings, and any rulemaking that does proceed should be scoped narrowly — limited to targeted housekeeping amendments to Chapter 7849 necessary to conform its terminology and process to the 2024 Minnesota Energy Infrastructure Permitting Act (“MEIPA”).

Legalelectric request for a stay of pending proceedings is the most consequential issue before the Commission in this docket, and it should be rejected. As the MTO comments note, a stay would halt proceedings regardless of their stage of development, penalizing applicants who structured their projects in good-faith reliance on existing Commission guidance and statutory requirements. For generation developers, the harm is especially acute: interconnection queue positions, offtake agreements, and financing commitments all operate on timelines that cannot accommodate a regulatory moratorium of indefinite duration. Staying the Commission’s review of these projects would delay clean energy infrastructure that Minnesota’s policy goals require and that ratepayers stand to benefit from.

Broad rulemaking on Chapters 7850 would inject uncertainty into every active permitting proceeding. The Commission has processed CN and siting proceedings under MEIPA without incident, applying its statutory authority and existing guidance. That track record undercuts any argument that a comprehensive new rulemaking is urgently needed to keep existing proceedings on solid legal footing.

If the Commission determines that some rulemaking is warranted, Geronimo urges that it be limited in scope and conducted on an expedited schedule. To the extent that updated Chapter 7849 rules are deemed necessary, as a general principle Geronimo supports rules that provide clear procedural guidance, reduce transaction costs, and eliminate ambiguity that creates unnecessary legal exposure for these applications.

Finally, Legalectric request for a stay of pending proceedings should be rejected. As the MTO comments note, a stay would halt proceedings regardless of their stage of development, penalizing applicants who structured their projects in good-faith reliance on existing Commission guidance and statutory requirements. For generation developers, the harm is especially acute: interconnection queue positions, offtake agreements, and financing commitments all operate on timelines that cannot accommodate a regulatory moratorium of indefinite duration. Staying the Commission's review of these projects would delay clean energy infrastructure that Minnesota's policy goals require and that ratepayers stand to benefit from.

CONCLUSION

Geronimo Power respectfully requests that the Commission:

1. Limit any rulemaking to targeted amendments to Chapter 7849 necessary to conform to MEIPA to the extent the Commission deems a rulemaking necessary; and
2. Deny the request to stay pending CN and siting proceedings.

Geronimo supports the utilities' position that the Commission's permitting work must continue uninterrupted as Minnesota's clean energy goals and the ratepayers who benefit from them cannot afford a regulatory pause.

Respectfully submitted,

s/ Alex Cutchey

Alex Cutchey, #0504911
Senior Manager Policy – Midwest
Geronimo Power, LLC
8400 Normandale Lake Blvd
Bloomington, MN 55437
(612) 532-1565
Acutchey@geronimopower.com

CERTIFICATE OF SERVICE

I, Alex Cutchey, hereby certify that on this May 7th day of May 2026, I e-filed with the eDocket System the following document(s) and have served copies of the same on the attached list of persons by electronic filing, electronic mail, or United States mail.

Reply Comments of Geronimo Power

In the Matter of a Possible Rulemaking to Amend Minnesota Rules, Chapters 7849 and 7850

MPUC Docket No. E-999/R-26-172

Dated this XXth day of May, 2026.

/s/ Alex Cutchey
Alexander J Cutchey