



June 15, 2026

Bennett Hanson
City of Mankato
10 Civic Center Plaza
Mankato, Minnesota 56002-3368

Subject: CUP Application – Response to Comments
CenterPoint Energy Minnesota Gas
Mankato Hydrogen Energy Plant Project

Dear Bennett:

Please find below our responses to the Site Plan and Traffic Advisory Committee comments received on June 10, 2026 for the CenterPoint Energy Minnesota Gas (CenterPoint) Mankato Hydrogen Energy Plant Project (Project).

CY29-26 Request of ERM on behalf of CenterPoint Energy, the property owner, for a final plat review of Centerpoint Energy Mankato First Addition, and for a conditional use permit to allow for a hydrogen facility that uses energy from a 1 megawatt on-site solar panel array on a property zoned M-2, Heavy Industrial. The subject property is described as part of the South Half of the Northwest Quarter of Section 5, Township 108 North, Range 26 West; AND, part of the South Half of the Northwest Quarter of Section 5, Township 108 North, Range 26 West; AND, a tract of land located in the South Half of the Northwest Quarter of Section 5, Township 108 North, Range 26 West; AND, part of a parcel lying within the Southeast Quarter of the Northwest Quarter, Section 5, Township 108 North, Range 26 West, all located in the City of Mankato, Blue Earth County (2400 N. Riverfront Drive, BE County PID's R010905176004, R010905176003, R010905176002, R010905176001).

- a. Comment: If not already done, the applicant shall log into the online portal and make notification payment.

Response: All notification payments and outstanding fees to date have been paid through the online portal.

- b. Comment: Applicant shall be aware that the approved conditions of the Preliminary Plat shall remain relevant and binding for the proposed project.

Response: CenterPoint acknowledges this requirement and will comply with the conditions of the approved Preliminary Plat.

- c. Comment: Applicant shall provide a breakdown of developable and non-developable areas of the subject property to City staff so that payment in lieu of parkland dedication may be calculated based on recent amendments to City ordinances. Payment in lieu parkland dedication will be required prior to affixing signatures to the final plat.

Response: Refer to the Developable Area Map (enclosed). Wetland and wetland setback areas have been designated as non-developable areas. Based on our calculations, the following was determined:

Total Developable Area = 14.0 Acres

Total Non-Developable Area = 0.83 Acres

Additionally, CenterPoint acknowledges that payment in lieu parkland dedication will be required prior to affixing signatures to the final plat.

- d.** *Comment: Applicant shall address any glare-related concerns and shall make any necessary modifications to the proposed solar array in order to mitigate the proposed glare conditions.*

Response: CenterPoint Energy acknowledges this requirement and will ensure that glare-related concerns are addressed. Muska Electric has prepared a supplement to the CenterPoint Solar Glare Study (enclosed).

- e.** *Comment: Wetlands and their respective buffer areas on the subject property shall be property signed per City of Mankato Standards prior to commencing work on site. BMPs shall be installed.*

Response: CenterPoint acknowledges this requirement and added a corresponding note to Sheet C8.01 of the CUP Civil Plans (enclosed).

- f.** *Comment: The applicant shall request and participate in a pre-construction meeting with the property owner, the contractor and City staff, after all BMP's have been installed, but prior to any work occurring on the site.*

Response: CenterPoint acknowledges this requirement for a pre-construction meeting and added a corresponding note to Sheet C8.01 of the CUP Civil Plans (enclosed).

- g.** *Comment: The applicant shall ensure that a sufficient and perpetual access easement is in place with the adjacent property owner to ensure continued private access from N. Riverfront Drive to the adjacent western property. The applicant shall provide easement documentation for any private easements recorded or to be recorded on the subject property.*

Response: Documentation for all private easements on the subject property was previously provided in Appendix B of the CUP application. CenterPoint is coordinating with the adjacent property owner to ensure continued private access to the adjacent western property.

- h.** *Comment: Code-compliant landscaping and ground cover shall be installed prior to completion and operation of the solar array.*

Response: CenterPoint acknowledges this requirement and will ensure that landscaping and ground cover will be installed in compliance with Mankato City Code prior to completion and operation of the solar array.

- i.** *Comment: All mechanical equipment shall be screened from rights of way and residential uses and zones.*

Response: CenterPoint acknowledges this requirement for mechanical equipment and added a screening fence east of the proposed fan on Sheet C4.02 of the CUP Civil Plans (enclosed).

- j.** *Comment: A fence permit shall be applied for and issued prior to installation of any fencing associated with the project.*

Response: CenterPoint acknowledges this requirement for a fence permit.

- k.** *Comment: Applicant shall provide engineered decommissioning plan for the solar array to City staff for review and approval. The decommissioning must include complete removal of the system including all footings and foundations to their full depth.*

Response: An engineered decommissioning plan for the solar array has been prepared (enclosed), which includes complete removal of the solar array and all associated racking supports and vertical pilings.

- l.** *Comment: Within one year of any termination of use of the proposed facility for energy generation, the property owner and applicant shall be responsible for dismantling and removing all equipment on site and restoring the property to its pre-existing condition per the terms of the decommissioning plan. The decommissioning plan shall include the removal of all poles, wire, conduit, etc. in their entirety and the site will be restored to pre-development conditions.*

Response: CenterPoint agrees to dismantle and remove all equipment and restore the site to pre-development conditions within one year of facility closure, in accordance with the approved decommissioning plan.

- m.** *Comment: The applicant shall submit a perpetual, irrevocable bond, letter of credit, or designated escrow account to the City of Mankato in the amount of a stamped, certified, Minnesota Engineer's removal cost estimate prior to issuance of a building permit. The security shall be in effect through the reclamation of the site.*

Response: CenterPoint agrees to provide a perpetual, irrevocable bond, letter of credit, or escrow account to the City of Mankato, based on a certified engineer's removal cost estimate, prior to issuance of a building permit, to be maintained through site reclamation.

- n.** *Comment: The bond amount shall be reevaluated every 5 years, and may result in an increase or decrease in the bond amount. The applicant is responsible for coordinating said requirement and submitting the required data. The final reevaluation shall occur not more than 1 year prior to decommissioning the site. The engineering costs and estimates for the reevaluation are to be paid by the applicant.*

Response: CenterPoint agrees to reevaluate the bond amount every five years (with a final review within one year of decommissioning), coordinate and submit required documentation, and bear all associated engineering costs.

- o.** *Comment: Water service connection type shall be noted on the plan sheet C9.02. Cut in mechanical joint fitting connection or wet tap.*

Response: Note added to Sheet C9.02 of the CUP Civil Plans (enclosed) for mechanical joint fitting or approved alternate.

- p.** *Comment: 6" Gate valve shall be added to proposed water service.*

Response: Note added to Sheet C9.02 of the CUP Civil Plans (enclosed) for proposed 6" gate valve at water service.

- q.** *Comment: Tracer wires shall be installed on water service per Minnesota Rural Water Association specification.*

Response: Note added to Sheet C9.02 of the CUP Civil Plans (enclosed) for tracer wires on proposed water service.

- r.** *Comment: Applicant shall update modeling to a type 3 rainfall distribution.*

Response: The Drainage Report (enclosed) was updated using the MSE 3 MN distribution for NOAA 14 per Section 3.2.1 of the City of Mankato Grading Manual.

- s.** *Comment: Applicant shall be aware that the MPCA Solar Panel Calculator is for an individual solar panel only. Please update to follow guidance on MPCA website.*

Response: The calculations in the Drainage Report (enclosed) were updated per MPCA guidance.

- t. *Comment: Applicant shall update Redirected Runoff Depth from solar panel to reflect interpolation of the values shown between 1 and 2, which will increase the total runoff from each panel.*

Response: The calculations in the Drainage Report (enclosed) were updated per MPCA guidance.

- u. *Comment: Applicant shall list assumptions and dimensions of the solar panels utilized to derive data in the MPCA calculator.*

Response: Sheet C10.04 solar panel detail in the CUP Civil Plans (enclosed) was updated with dimensions reflected in the updated stormwater solar calculations.

- v. *Comment: The applicant will be required to pay SAC & WAC connection charges based on the City of Mankato assessment policy and fee schedule.*

Response: CenterPoint acknowledges this requirement and will pay the applicable SAC and WAC connection charges based on the City of Mankato assessment policy and fee schedule.

- w. *Comment: Applicant shall complete MPCA Industrial pretreatment discharge to a municipal wastewater treatment facility application (wq-wwprm7-23) [Wastewater permit forms | Minnesota Pollution Control Agency](#).*

Response: CenterPoint acknowledges this requirement and will complete the required application to obtain Industrial Pretreatment Discharge authorization from MPCA and City of Mankato.

Blue Earth County Comments:

- x. *Comment: Applicant shall coordinate with adjacent property owner (to the west & north) to ensure access rights through the property.*

Response: Access rights currently exist under previously provided agreements. CenterPoint is coordinating with the adjacent property owners to ensure continued access rights through the property.

- y. *Comment: Applicant shall be aware that the access Blue Earth County provided to the adjacent agricultural property off of CSAH 57 (to the north), is dedicated strictly for farm access and will not be utilized for any future development access.*

Response: CenterPoint acknowledges this comment.

MnDOT Comments:

- z. *Comment: Applicant shall verify coordination with MnDOT's Office of Aeronautics based on the findings of the glare study for the solar array. This is due to the presence of "flight path" receptors that are at the Mankato Regional Airport.*

Response: CenterPoint is in contact with MnDOT's planning staff and coordinating with Rylan Juran with MnDOT's Office of Aeronautics regarding the glare study for the solar array.

- aa. *Comment: Due to the presence of Hwy 14 receptors, the applicant shall be aware that the MnDOT Traffic Engineer will review the glare study and may provide comments to the applicant that shall be addressed.*

Response: CenterPoint is in contact with MnDOT's planning staff and coordinating with MnDOT's District 7 Traffic Engineer Scott Thompson regarding comments on the glare study for the solar array.

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If you have any questions or require additional information, please contact me at (612) 280-1295, or Wayne Sicora at Environmental Resources Management (ERM), CenterPoint's consultant for this Project, at (612) 597-4574.

Sincerely,



Andrew Rockwell, Plant Manager
CenterPoint Energy Minnesota Gas

Cc: Micheal Fogarty, CenterPoint
Colton Peshek, CenterPoint
Dennis Daas, CenterPoint
Wayne Sicora PE, ERM

Enclosures:

Solar Glare Study Supplement_2026-06-15
Developable Area Map
CUP Civil Plans_2026-06-15
Solar Decommissioning Plan and Estimate
Drainage Report_2026-06-15