

Memorandum

To: Commissioners Christmann, Haugen-Hoffart, and Kringstad
From: Adam Renfandt 
Date: August 24, 2026

Subject: Emmons-Logan Energy Storage, LLC, Emmons-Logan Energy Storage - Emmons County, Decommissioning Plan & Cost, Case No. PU-226-151 and Northern Divide Energy Storage, LLC, Northern Divide Energy Storage Project - Burke Cty, Decommissioning Plan & Cost, Case No. PU-26-159

On April 15, 2026, Emmons-Logan Energy Storage, LLC (Emmons Logan) filed financial assurance in the form of a parent guarantee with the Commission to cover the decommissioning of the facility if they abandon the project prior to operations. On April 28, 2026, Northern Divide Energy Storage, LLC (Northern Divide) filed a similar parent guarantee to cover the same obligation. Both Emmons Logan and Northern Divide named NextEra Energy Capital Holdings, Inc. (NEECH) as the guarantor. NEECH meets the Commission's credit rating requirements to guarantee such obligations, and the amount of the guarantees are for the correct amounts.

Both Emmons Logan and Northern Divide voluntarily agreed to submit decommissioning financial assurance to the Commission in accordance with the Commission's existing rules governing wind facilities. Since the obligations of the financial assurances were established from voluntary agreements in siting cases, Staff will treat these financial assurances and future ones as a compliance matter and will not be placing them on the Commission's docket for approval. If Staff notices any noncompliance with the Findings of Fact, Conclusions of Law and Order, Staff will present its case to the Commission. Therefore, future memorandums will not be forthcoming as Staff will use the vehicle of a noncompliance letter to the company as notification to the Commission that the company is not complying with their voluntary agreements just as Staff follows other noncompliance matters stemming from siting cases.