Exhibit 8

Maddy Doeden Pre-Filed Direct Testimony

Exhibit 8

BEFORE THE STATE OF NORTH DAKOTA
PUBLIC SERVICE COMMISSION

HARMONY STORAGE, LLC
HARMONY STORAGE PROJECT – CASS COUNTY
SITING APPLICATION

CASE NO. PU-26-284

PRE-FILED TESTIMONY OF MADDY DOEDEN ON BEHALF OF HARMONY STORAGE, LLC

October 14, 2026

I. INTRODUCTION AND QUALIFICATIONS

Q. Please state your name, employer, and business address.

A. My name is Maddy Doeden. I am employed by Geronimo Power, LLC ("Geronimo Power"). My business address is 8400 Normandale Lake Boulevard, Suite 1200, Bloomington, Minnesota 55437.

Q. What is your position with Geronimo Power?

A. I am a Senior Developer, Late-Stage Projects for Geronimo Power.

Q. Briefly describe your work history and education.

A. I have a Bachelor of Arts degree in environmental studies and legal studies from the University of Wisconsin-Madison. I have experience leading planning and risk management efforts for energy and infrastructure projects. A copy of my resume is attached as proposed Exhibit 8-A.

Q. What is your role with respect to the Harmony Storage Project ("Project")?

A. I am the late-stage manager for the Project. I am responsible for coordinating and advancing the Project through the final stages of development, including management of permitting and regulatory activities, engineering coordination, EPC and construction planning, procurement activities, scheduling, budget coordination, and other development activities necessary to prepare the Project for construction and operation.

Q. Who will construct, own, and operate the Project?

A. Harmony Storage, LLC ("Harmony Storage") will construct, own, and operate the Project.

Q. What is the relationship between Harmony Storage and Geronimo Power with respect to the Project?

A. Harmony Storage is a wholly-owned subsidiary of Geronimo Power. Geronimo Power is assisting Harmony Storage with development of the Project.

Q. Please describe Geronimo Power's experience in the renewable energy industry.

A. Geronimo Power is a utility-scale renewable energy development company headquartered in Bloomington, Minnesota that has developed multiple operating solar, wind, and energy storage projects throughout the Unites States. Over 3,500 megawatts ("MW") of solar, wind, or energy storage projects developed by Geronimo are either under construction or operational. In addition, Geronimo Power has a multi-gigawatt development pipeline of solar, wind, and energy storage projects in various stages of development throughout the United States.

Q. What proposed hearing exhibits are you sponsoring in your testimony?

A. I am sponsoring the following proposed hearing exhibits:

- Exhibit 1: Certificate of Site Compatibility Application ("Application")
- Exhibit 2: Project Figure
- Exhibit 3: Project Receptor Chart
- Exhibit 4: Class III Intensive Cultural Resource Inventory Report
- Exhibit 5: State Historical Society of North Dakota Correspondence
- Exhibit 6: Agency Correspondence Regarding Vegetation Management Plan
- Exhibit 7: Signed Certification Relating to Order Provisions – Energy Conversion Facility Siting, with accompanying Tree and Shrub Mitigation Specifications
- Exhibit 8: Pre-filed Testimony of Maddy Doeden
- Exhibit 8-A: Maddy Doeden Resume

Q. What is the purpose of your Direct Testimony?

A. The purpose of my testimony is to provide an overview of the Project's development history, including site selection and stakeholder coordination. I will also discuss the environmental and land use analysis conducted for the Project, including the results of the various reports included in support of the Application and the Project's compliance with the North Dakota Public Service Commission's ("PSC") siting criteria and the Siting Act (North Dakota Century Code ("NDCC") Ch. 49-22). I also provide an update on the status of agency consultation.

II. OVERVIEW OF THE PROJECT

Q. Since Harmony Storage's Application was filed with the PSC on July 10, 2026, have there been any updates to the Project layout?

A. No, the layout shown on Figure 2 filed with the Application (proposed Exhibit 1) the current layout.

Q. Has Harmony Storage executed a Generator Interconnection Agreement for the Project?

A. Yes. Harmony Storage executed its Surplus Generator Interconnection Agreement with the Midcontinent Independent Transmission System Operator ("MISO") and Northern States Power, the local transmission owner, on June 23, 2026.

Q. What is the anticipated schedule for the construction and in-service of the Project?

A. Project construction is anticipated to begin as early as the Second Quarter of 2027 and the Project is anticipated to be operational in December 2028.

Q. What is the estimated total cost of the Project?

A. The estimated total cost to construct the Project is approximately $249 million.

III. PROJECT SITE SELECTION

Q. Please provide a general description of the site selected for the Project.

A. The Project is within an approximately 74-acre Project Area ("Project Area") located in Cass County, North Dakota. The Project footprint will be approximately 9.73 acres within the Project Area.

Q. What factors make the Project Area a good site for energy storage development?

A. A key factor in Project site selection was proximity to the Harmony Solar Project (PU-18-219), which is being developed by Harmony Solar ND, LLC ("Harmony Solar") – also a subsidiary of Geronimo Power. Harmony Solar received permits from Harmony Township and the PSC and is currently under construction. As discussed further in the Prefiled Testimony of Andrew Larson (proposed Exhibit 9), the Project will utilize the Harmony Solar substation and transmission line to access the electric grid, and the Project will store excess capacity generated by the Harmony Solar Project. By utilizing the Harmony Solar Project's substation and interconnection facilities, Harmony Storage has minimized the Project's overall footprint while delivering additional grid value through energy storage from the solar facility and the electric grid.

Harmony Storage selected the specific Project Area based on the landowner's willingness to lease the site, as well as compatibility with existing land uses and resources, and minimal potential impact on human and environmental resources.

Q. Has Harmony Storage identified an off-taker for the Project?

A. Both Harmony Storage and Harmony Solar are in late-stage negotiations with an off-taker.

Q. Has Harmony Storage obtained the necessary property rights to construct the Project within the proposed Project Area?

A. Yes. Harmony Storage has executed a lease agreement with a private landowner covering the entirety of the Project Area. Additionally, Harmony Storage will enter into a shared facilities agreement with Harmony Solar to connect the Project to the Harmony Solar Project's collection substation.

IV. SETBACKS

Q. Is the Project designed to comply with all the setback requirements in the Siting Act and the PSC's rules?

A. Yes.

Q. Is the Project also designed to comply with all applicable local setback requirements?

A. Yes.

Q. Has Harmony Storage prepared figures that depict setbacks and other siting constraints for the Project?

A. Yes. That information is depicted in the setbacks map provided as Figure 4 (proposed Exhibit 1) and on the new figure provided as proposed Exhibit 2, which depicts the Project Area, layout, setbacks, residence IDs, wetlands, floodplains, and Township, Range, and Section labels on one map for ease of reference. Additionally, exclusion and avoidance areas are shown on Figure 3 (proposed Exhibit 1). Note that Figure 3 does not show the location of cultural resources, which are confidential.

Q. Does the setbacks map show occupied residences within the Study Area?

A. Yes.

Q. Please describe how Harmony Storage identified occupied residences.

A. Harmony Storage identified occupied residences by conducting field reconnaissance on and around the site. To be conservative, if we could not confirm a structure was unoccupied, we considered it an occupied residence for purposes of our analysis.

Q. How many occupied residences were identified within the Study Area?

A. There are five inhabited residences located within the Study Area. There are no residences located within the Project Area.

Q. Has Harmony Storage prepared a table summarizing information pertaining to these five occupied residences?

A. Yes, the Project Receptor Chart is provided as proposed Exhibit 3. The chart lists the distance from the residence to the Project Area and the Project's fenced perimeter, and the modeled sound level in A-weighted decibel ("dBA").

Q. What is the shortest distance between the Project and an occupied residence?

A. The closest occupied residence to the Project Area is Residence R01, which is located 4,059.5 feet from the Project Area. Residence R01 is also the closest occupied residence to the Project perimeter fence and is located 4,823.6 feet from the perimeter fence.

V. ENVIRONMENTAL AND SITE ANALYSIS OVERVIEW

Q. Please provide a general description of the Project Area from a land use perspective.

A. The Project Area is in a rural area in North Dakota. The majority of the Project Area (over 90 percent) is currently comprised of cultivated crops, with the remaining land cover consisting of developed land (roads). The Project Area is adjacent to the Harmony Solar Project's collection substation and the existing Bison Substation.

Q. What was the overall approach to environmental analysis of the Project Area?

A. Our analysis included the Project Area, as well as a Study Area that consisted of a one-mile buffer around the Project Area. Harmony Storage conducted a desktop analysis of available land use and environmental information to identify PSC exclusion and avoidance areas, as well as other potentially sensitive resources. Harmony Storage also conducted site-specific field surveys, such as a wetland and waterbody survey, cultural resource survey, and a survey to evaluate the presence of potential habitat for federally listed species.

Harmony Storage used the desktop data and the site-specific survey data, along with agency and other stakeholder input, to design the Project to avoid or minimize environmental impacts. This analysis is generally described in the various sections of the Application (proposed Exhibit 1).

Q. Based on the preliminary design, what are the estimated land requirements for the Project components within the fenced area?

A. As discussed in Section 3.5 and shown in Table 35-1 of the Application (proposed Exhibit 1), of the 74-acre Project Area, a total of 12.25 acres will be located within the fenced perimeter, Of the 12.25 acres, approximately 9.62 acres will host Project facilities. The remaining 2.64 acres will be stormwater basins that will be revegetated following construction.

Q. Based on the preliminary design, what are the estimated land requirements for the Project components outside the fenced area?

A. Outside of the fenced area, approximately 0.11 acres of access roads will be constructed. Other Project facilities outside the fenced perimeter include underground electrical collection lines; these areas will be revegetated after the installation of the facilities.

Q. What is the overall estimated footprint of the Project?

A. Overall, approximately 9.73 acres will host permanent Project facilities for the life of the Project.

Q. How will the site be restored post-construction?

A. Following construction, non-cropland areas temporarily impacted by construction will be reclaimed and reseeded with a seed mixture consistent with the surrounding vegetation and free of noxious weeds per U.S. Department of Agriculture, Natural Resources Conservation Service ("USDA – NRCS") recommendations and in accordance with the Project's Vegetation Management Plan ("VMP") (Appendix E to the Application (proposed Exhibit 1)), unless otherwise specified by the landowner and approved by the PSC. Any portion of the Project Area not used for the Project will be available to return to use as cropland.

VI. WETLANDS AND WATERBODIES

Q. How has Harmony Storage identified wetlands and waterbodies within the Project Area?

A. Wetlands and waterbodies within the Project Area were initially identified using publicly available desktop data. Field wetland and waterbody delineations were then completed in October 2025 for an area encompassing the Project Area. The field delineation identified 1.94 acres of wetlands within the survey corridors, as shown on Figure 3 to the Application (proposed Exhibit 1). The Aquatic Resources Delineation Report is included as Appendix H to the Application (proposed Exhibit 1).

Q. Did Harmony Storage consider potential impacts to wetlands and waterbodies when designing the Project layout? If so, how?

A. Yes. Harmony Storage designed the Project to avoid permanent and temporary impacts to wetlands and waterbodies. There are no wetlands located within the fenced perimeter, and access roads outside of the fenced perimeter avoid wetlands. In limited locations where underground electrical collection lines intersect wetlands,

Harmony Storage will bore the electrical collection cables under the wetlands, thereby avoiding impacts. Specifically, the collection lines will be bored under the field delineated wetland that is adjacent to 162nd Avenue, therefore avoiding impacts to the wetland.

Q. Are there any Federal Emergency Management Agency ("FEMA") flood hazard areas or floodplains within the Project Area?

A. Yes. There are approximately 1.8 acres of FEMA 100-year floodplain mapped within the Project Area, on the eastern edge.

Q. Did Harmony Storage consider potential impacts to the 100-year floodplain when designing the Project layout? If so, how?

A. Yes. Project facilities have been sited to avoid the FEMA 100-year floodplain; accordingly, no impacts are anticipated.

VII. WILDLIFE

Q. Please discuss the wildlife and habitat assessment conducted for the Project and the associated results.

A. Harmony Storage utilized the U.S. Fish and Wildlife Service ("USFWS") Information for Planning and Consultation ("IPaC") tool, which indicated that two species proposed for federal listing have the potential to occur within the Project Area: Monarch butterfly (Proposed Threatened) and Suckley's cuckoo bumble bee (Proposed Endangered). No designated critical habitat is present within the Project Area.

In October 2025, Harmony Storage conducted a field survey to evaluate potential habitat for the Monarch butterfly and Suckley's cuckoo bumble bee, as well as a field review for eagle nests. Neither the Monarch butterfly or Suckley's cuckoo bumble bee were observed during the field visit. No potentially suitable habitat for the Suckley's cuckoo bumble bee was identified. Potentially suitable Monarch butterfly habitat is

limited to road ditches and areas adjacent to water resources, as the majority of the Project Area is disturbed (cultivated cropland).

No eagle or raptor nests were observed within the Project Area or from public rights of-way in the vicinity during the October 2025 field visit. Additionally, no trees or forested areas are present within the Project Area.

Based on the analysis conducted, the Project is not anticipated to adversely affect protected wildlife species. The assessment and associated results are summarized in Appendix I to the Application (proposed Exhibit 1).

VIII. CULTURAL RESOURCES

Q. Please provide an overview of the cultural resource investigations conducted for the Project.

A. Harmony Storage conducted the following:

- A Class I literature search for the Project Area plus a one-mile buffer for archaeological resources and a 0.25-mile buffer for architectural resources.
- A Class III cultural resources inventory of the Project Area.

Q. Have the Class I and Class III results been submitted to the State Historical Society of North Dakota ("SHSND")?

A. Yes. The Class III cultural resources inventory report (provided as proposed Exhibit 4) was submitted to the SHSND on August 7, 2026. SHSND provided an acceptance letter for the report dated August 31, 2026, which is provided in proposed Exhibit 5.

Q. Please describe the results of the Class I and Class III cultural survey work conducted for the Project.

A. The Class I literature search identified three previously recorded archaeological sites and one site lead within the one-mile buffer. No previously recorded archaeological

sites or site leads, burial sites or cemeteries, or architectural sites were identified in the Project Area.

A Class III intensive archaeological survey was conducted in May 2026 and covered the Project Area. The Class III survey identified one previously unrecorded historic archaeological site within the Project Area. This site is unevaluated for National Register of Historic Places ("NRHP") eligibility. In accordance with SHSND recommendations in its second August 31, 2026 letter (provided in proposed Exhibit 5), Harmony Storage will avoid this unevaluated site by at least 50 feet.

Q. Will there be procedures in place to address previously unidentified cultural resources encountered during construction?

A. Yes. Harmony Storage has prepared an Unanticipated Discoveries Plan ("UDP") for the Project and submitted the UDP to SHSND with the Class III report (proposed Exhibit 4).

IX. PROJECT BENEFITS

Q. What are some of the benefits of the proposed Project?

A. The Project will provide the participating landowner with an additional, steady income source. Additionally, the Project will generate direct economic benefits in the form of property taxes paid to taxing authorities. Over the life of the Project, Harmony Storage anticipates paying approximately $1.1 million in property taxes.

The Project will also provide temporary and long-term employment opportunities. During construction, the Project is anticipated to increase spending/revenue in the vicinity of the Project due to increased demand for lodging, food services, fuel, and general supplies.

X. LOCAL PERMITS AND APPROVALS

Q. Does the Project need to obtain a local zoning permit from Harmony Township?

A. No. Harmony Township's zoning ordinance authorizes energy storage projects associated with already-permitted solar projects, such as the Project, as permitted uses. As a permitted use, a zoning permit for the Project is not required from Harmony Township.

Q. Has Harmony Storage committed to obtained all necessary federal, state, county, and township permits?

A. Yes.

Q. Will Harmony Storage coordinate with all applicable road authorities?

A. Yes. Harmony Storage will negotiate a road use agreement with Harmony Township and, if needed, Cass County.

XI. AGENCY COORDINATION

Q. Prior to filing its Application, did Harmony Storage send consultation letters to all agencies and entities identified in North Dakota Administrative Code ("NDAC") Section 69-06-01-05?

A. Yes.

Q. Does Section 8.0 of the Application provide summaries of the agency and stakeholder correspondence received prior to filing the Application?

A. Yes.

Q. Since the Application was filed, has Harmony Storage received any additional agency correspondence?

A. Yes. As noted above, after the Application was filed, Harmony Storage received additional comments and correspondence from the SHSND. Additionally, Harmony

Storage received correspondence from the USDA – NRCS, the North Dakota Department of Agriculture ("NDDA"), and the Cass County Weed Board regarding the Project's VMP and weed control measures.

Q. Is that additional correspondence provided in proposed Exhibits 5 and 6?

A. Yes.

Q. Please discuss Harmony Storage's coordination with the USDA – NRCS, the NDDA, and the Cass County Weed Board regarding the Project's VMP.

A. Harmony Storage has prepared a VMP (included as Appendix E to the Application (proposed Exhibit 1) for the Project that addresses, among other things, seed mix and seeding specifications as well as noxious weed control measures and considerations. The USDA – NRCS, NDDA, and the Cass County Weed Board have reviewed the Project's VMP. The USDA – NRCS had one minor clarifying edit to the name of a plant species; this edit will be incorporated into the VMP. The NDDA and Cass County Weed Board had no comments.

XII. CERTIFICATION RELATING TO ORDER PROVISIONS FOR ENERGY CONVERSION FACILITY SITING

Q. Has Harmony Storage provided a signed Certification Relating to Order Provisions for Energy Conversion Facility Siting, with accompanying Tree and Shrub Mitigation Specifications ("Certification")?

A. Yes. The Certification is proposed Exhibit 7.

Q. Who executed the Certification on behalf of Harmony Storage?

A. Nathan Franzen.

Q. Does Mr. Franzen have authority to bind Harmony Storage with respect to the commitments made in the Certification?

A. Yes.

387

388 **Q. Will Harmony Storage comply with the PSC's Tree and Shrub Mitigation**
389 **Specifications?**
390 A. Yes.
391
392 **XIII.COMPLIANCE WITH PSC SITING RULES**
393
394 **Q. Are you familiar with the exclusion areas, avoidance areas, selection criteria,**
395 **and policy criteria identified in NDAC Section 69-06-08-01?**
396 A. Yes.
397
398 **Q. Are any exclusion areas located within the Project Area?**
399 A. No.
400
401 **Q. Are any avoidance areas present within the Project Area?**
402 A. Yes. The following avoidance areas are present within the Project Area:
403 • Historical resources which are not designated as exclusion areas. Harmony
404 Storage has sited Project facilities to avoid the one unevaluated, archaeological
405 resource site identified.
406 • Areas within known floodplains as defined by the geographical boundaries of the
407 hundred year flood. Based on publicly available FEMA data, approximately 1.8
408 acres of 100-year floodplain is located within the Project Area. However, Project
409 facilities will avoid the FEMA 100-year floodplains; accordingly, no impacts are
410 anticipated.
411 • Woodlands and wetlands. There are no woodlands within the Project Area, but
412 there are wetlands present within the Project Area. Harmony Storage has
413 designed the Project to avoid permanent and temporary impacts to wetlands.
414
415 **Q. Will any significant adverse effects resulting from the location, construction,**
416 **and operation of the Project as they relate to the selection criteria set forth in**

the PSC's rules be at an acceptable minimum or managed and maintained at an acceptable minimum?

A. Yes.

Q. Were the policy criteria set forth in the PSC's siting rules considered and utilized to the extent possible by Harmony Storage when designing the proposed Project?

A. Yes.

Q. Were the factors set forth in NDCC Section 49-22-09 considered by Harmony Storage when designing the proposed Project?

A. Yes.

XIV. CONCLUSION

Q. Based on the analysis conducted by Harmony Storage, as set forth in the proposed hearing exhibits, will construction of the proposed Project produce minimal adverse human and environmental effects?

A. Yes.

Q. Does this conclude your Testimony?

A. Yes