



May 8, 2020

Mr. William Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

—Via Electronic Filing—

Re: Comments in the Matter of the Department of Commerce Energy Environmental Review and Analysis's Recommendations on Review of Solar and Wind Decommissioning Plans (Docket No. E-999/M-17-123)

Dear Mr. Seuffert:

Avangrid Renewables, LLC (Avangrid Renewables) submits to the Minnesota Public Utilities Commission (Commission) these comments regarding the Minnesota Department of Commerce Energy Environmental Review and Analysis's (DOCC EERA) filing of *Recommendations on Review of Solar and Wind Decommissioning Plans* from March 16, 2020.

Avangrid Renewables is one of the leading providers of clean, renewable wind power in the U.S. with more than 6,000 megawatts (MW) of wind and solar power facilities in 22 states, including approximately 550 MW of wind energy in Minnesota. Avangrid Renewables understands that decommissioning plans act as an assurance that facilities will be properly decommissioned at the end of their useful life and restored with costs borne by the facility owner. Avangrid Renewables appreciates the opportunity to comment on the document's recommendations which include information on decommissioning plan content, plan review procedures, and a proposed review order.

Decommissioning Plan Content

Avangrid Renewables recognizes the importance of providing a detailed decommissioning plan as part of the permit process and would like to note the following:

1. Project description information should be included in the decommissioning plan. Avangrid Renewables would like clarification on what type of "acreage" is requested by DOCC EERA as part of the decommissioning plan.
2. A general statement on where the generation goes may be provided in the decommissioning plan, however details of generation output and Power Purchase Agreements (PPAs) are often trade secret and should not be included in the decommissioning plan.



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3. Decommissioning cost estimates should provide total and net costs and associated assumptions for the calculations.
4. In general, Avangrid Renewables is in agreement with the recommendations that a decommissioning plan should identify specific financial costs for decommissioning by year 10 of operation and should be reviewed every five years; however, in Avangrid Renewables' experience, PPAs hold no bearing on financial surety and note that landowner wind leases and easements provide a contractual requirement for the project owner to decommission and restore land to previous conditions.
5. The financial surety should be based on net costs (total costs minus salvage value) and implemented in a step-wise manner. The type of financial assurance mechanism should be flexible and include letters of credit and parent/corporate guarantees from creditworthy companies. Additionally, the beneficiary of the financial assurance mechanism should be a government entity, such as the local county or the Commission to ensure that all landowners have an equal opportunity to obtain the necessary proceeds to restore their property in the event of default.

Plan Review Timeline

The DOCC EERA recommendations proposed a sequence in which to review decommissioning plans for currently operating projects. The proposed timeline begins in 2020 and would require projects to file an updated decommissioning plan. Avangrid Renewables requests that the Commission shift the review schedule for operating projects from starting in 2020 to 2021, to allow facility owners time to budget for this work and implement it with a reasonable timeline. The 2020 operating budgets were requested in mid-2019 and are already completed. Requiring new decommissioning plans for operating facilities in 2020 would be an unbudgeted activity and a financial hardship.

Avangrid Renewables appreciates the DOCC EERA recommendations for decommissioning of solar and wind facilities and this opportunity to comment to the Commission on their reported recommendations.

Sincerely,

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DocuSigned by:
Jace Fabrycki
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Jace Fabrycki
Avangrid Renewables, LLC
Senior Director, Asset Management