



February 4, 2022

Sarah Johnson Phillips
33 S Sixth Street, Suite 4200
Minneapolis, MN 55402
D. 612.373.8843
sarah.phillips@stoel.com

VIA E-FILING

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

**Re: Reply Comment – In the Matter of the Application of Zephyr Wind, LLC, for a Site Permit Amendment to Repower the 30.75 MW Community Wind South Large Wind Energy Conversion System
MPUC Docket No. IP-6871/WS-11-863**

Dear Mr. Seuffert:

Zephyr Wind, LLC (“Zephyr”) respectfully submits this reply comment letter in response to the Department of Commerce – Energy Environmental Review and Analysis (“EERA”) staff comment dated January 14, 2022 (“EERA Comment”) and to provide updates on Zephyr’s plans for repowering the Community Wind South Wind Project (the “Project”).

In the EERA Comment, EERA recommended certain updates and clarifications to Zephyr’s Proposed Findings of Fact and the Draft Site Permit for the Project. Zephyr supports all of EERA’s recommended updates and clarifications, including EERA’s recommendation that the lighting mitigation requirements in Section 5.3.29 of the Draft Site Permit apply to both turbine towers and the meteorological towers. Zephyr will plan for its lighting mitigation system to include all turbine towers and the Project’s meteorological tower.

With respect to the above-referenced Project updates, Zephyr has determined that it may be efficient to derate the repowered turbines from 2.2 MW to 2.05 MW for an initial period following repowering construction. As described in Zephyr’s application, the repowering will include replacing the existing 2.05 MW REpower MM92 turbines with new Vestas V110 2.2 MW turbines. Derating would mean operating the new turbines at 2.05 MW, with no other changes to the turbines. Since the turbine model has not changed and Zephyr may be able to use the full 2.2 MW capability of the turbines in the future, the descriptions of the planned repowering in the Draft Site Permit and Proposed Findings of Fact remain accurate. However, to reflect this additional aspect of Zephyr’s plans, it would be appropriate to:

- 1) Revise the table in Section 4.9 of the Draft Site Permit to describe the turbine capacity as “up to 2.2. MW” rather than “2.2 MW”; and

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- 2) Add the following sentence to paragraph 20 of the Proposed Findings of Fact:
“Zephyr is considering derating the turbines to 2.05 MW for an initial period following repowering construction, but may increase the nameplate capacity of each turbine to 2.2 MW in the future.”

As described in the EERA Comment and paragraph 24 of the Proposed Findings of Fact, Zephyr requested wind access buffer setback waivers with respect to turbines T-1, T-3, T-12, T-13, and T-14. Zephyr recently obtained a signed participation agreement for one of the affected parcels (Parcel 09-0072-000). Zephyr will continue good faith negotiations with the other affected landowners, but maintains its request for wind access buffer setback waivers for turbines T-1, T-3, T-12, T-13, and T-14.

Zephyr is available to answer any questions concerning this reply comment letter or any aspect of its application.

By copy of this letter, all parties have been served. Also attached is a Certificate of Service.

Very truly yours,

Stoel Rives LLP

/s/ Sarah Johnson Phillips

Sarah Johnson Phillips

SJP:cal
Enclosures

cc: Service List

CERTIFICATE OF SERVICE

I, Carmel Laney, hereby certify that I have this day served a true and correct copy of the following document(s) to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States Mail at Minneapolis, Minnesota.

REPLY COMMENT ON BEHALF OF ZEPHYR WIND, LLC

In the Matter of the Application of Zephyr Wind, LLC, for a Site Permit Amendment to Repower the 30.75 MW Community Wind South Large Wind Energy Conversion System
MPUC Docket No. IP-6871/WS-11-863

Dated this 4th day of February, 2022.

/s/ Carmel Laney
Carmel Laney

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_11-863_Official
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_11-863_Official
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_11-863_Official
Justin	Fike	justin.fike@greenbackercapital.com	Greenbacker Renewable Energy Company, LLC	Greenbacker Renewable Energy Company, LLC 11 E. 44th Street, Suite 1200 New York, NY 10017	Electronic Service	No	OFF_SL_11-863_Official
Kathy	Henderschiedt	PublicWorks@co.nobles.mn.us	Nobles County	960 Diagonal Rd PO Box 187 Worthington, MN 56187-0187	Electronic Service	No	OFF_SL_11-863_Official
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_11-863_Official
Stacy	Kotch Egstad	Stacy.Kotch@state.mn.us	MINNESOTA DEPARTMENT OF TRANSPORTATION	395 John Ireland Blvd. St. Paul, MN 55155	Electronic Service	No	OFF_SL_11-863_Official
Andrea	Moffatt	amoffatt@wsbeng.com	WSB Associates	Suite 300 701 Xenia Avenue Minneapolis, MN 55416	Electronic Service	No	OFF_SL_11-863_Official
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_11-863_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_11-863_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_11-863_Official
Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources	500 Lafayette Road Box 25 St. Paul, Minnesota 55155-4040	Electronic Service	No	OFF_SL_11-863_Official
David	Weetman	david.weetman@westwoodps.com	Westwood Professional Services	12701 Whitewater Dr Ste 300 Minnetonka, MN 55343	Electronic Service	No	OFF_SL_11-863_Official