



Minnesota Department of Natural Resources
Division of Ecological & Water Resources
500 Lafayette Road
St. Paul, MN 55155-4040

May 8, 2020

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

RE: In the Matter of the Department of Commerce Working Group on Decommissioning of Wind and Solar Facilities, PUC Docket Number: E-999/M-17-123

Dear Mr. Seuffert,

The Minnesota Department of Natural Resources (DNR) appreciates the opportunity to comment on the Department of Commerce Energy Environmental Review and Analysis's (EERA) *Recommendations on Review of Solar and Wind Decommissioning Plans*. Our agency offers the following comments and recommendations:

Repower Projects

Footnote 2 on page 2 lists wind projects that have been repowered or are in the process of repowering. Buffalo Ridge Wind, which is seeking a full repower of an existing site, is not included in the list of repower projects.

Agency Coordination

The DNR's previous comment letter (attached) recommended that decommissioning plans require coordination with relevant state agencies. Our agency would like to reiterate the importance of agency coordination. Agency coordination is important because decommissioning activities could:

- trigger the need for agency permits or licenses;
- involve decisions regarding infrastructure removal (or leaving infrastructure in place) within or near sensitive resources; and
- impact rare and unique resources such as listed species, native prairies, or calcareous fens.

The projects that have been decommissioned thus far have been wind projects that have pursued repowering. The general review process for wind repowering includes an opportunity for agency and public comment. However, if a wind or solar project were decommissioned without repowering, it is unclear if there would be an opportunity for agency comment or coordination.

If you have questions about our agency's comments, I may be reached at cynthia.warzecha@state.mn.us or by leaving a voicemail at 651-259-5078.

Sincerely,

/S/ Cynthia Warzecha
Energy Projects Planner

Attachment: Minnesota Department of Natural Resources comment letter (September 25, 2019)

CC: Charley Bruce, Minnesota Public Utilities Commission
Suzanne Steinhauer, Minnesota Department of Commerce - EERA