



# BIG BLUE WIND FARM

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September 18, 2017

**Via Electronic Filing**

Mr. Daniel Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
121 Seventh Place East, Suite 350  
St. Paul, MN 55101-2147

**Re: *In the Matter of Big Blue Wind Farm, LLC 36 Megawatt Large Wind Energy Conversion System in Faribault County, Minnesota, IP-66851/WS-10-1238***  
**Response of Big Blue Wind Farm, LLC**

Dear Mr. Wolf:

Big Blue Wind Farm, LLC (“Big Blue”) respectfully submits the following Response to the five separate letters Mr. Dan Moore submitted over the last week alleging that Big Blue is not in compliance with the Site Permit for the Big Blue Wind Farm (“Project”). As explained below, Mr. Moore’s allegations are completely unsupported and continue to evidence a fundamental misunderstanding of the permitting process, the facts and the requirements of the Site Permit. This lack of understanding is surprising as Mr. Moore was one of the principal developers of the Project and was paid a substantial development fee upon the Project reaching commercial operation – a fact Mr. Moore omits from his numerous letters. Providing Mr. Moore with the benefit of the doubt that his letters are intended to express legitimate concerns rather than to advance another agenda, Big Blue responds to each of his recent letters with the facts.

## **1. Foundation Change**

Mr. Moore alleges that Big Blue violated its Site Permit by employing a spread-foot foundation rather than a “P&H pile type foundation” that was described in Big Blue’s Site Permit Application. According to Mr. Moore, “our groundwater is at danger for leaching from these foundations” and he “does not believe that enough engineering was done to build these turbines on these soils” and a turbine could fall over “killing someone.” Mr. Moore’s claims are baseless and highly inflammatory.

First, there is nothing in the Site Permit that requires Big Blue to use a certain type of turbine foundation. This is no doubt because this decision is made in the micro-siting process based upon soil conditions. With respect to the Project, foundation type was dictated by the soils report completed by the soils engineers hired to perform the geotechnical report for the Project. Big Blue retained Sargent & Lundy to review and evaluate the designs for the turbine foundations and the foundations were signed off on by a professional engineer. Mr. Moore's allegation that the commonly-used spread-foot foundation poses a risk to groundwater or negatively impacts turbine stability is without merit and wholly unsupported. Finally, as Mr. Moore concedes, the spread-foot foundations were included in the as-built plans and specifications filed with the Commission. Big Blue has met its permit obligations.

## **2. Pad Mount Transformer**

Mr. Moore alleges that Big Blue is in breach of the Site Permit because it installed "up-tower transformers" rather than "pad-mount transformers." What Mr. Moore fails to recognize, however, is that the location of the turbine transformer is dictated by the turbine type. In this case, the Site Permit specifically authorized Big Blue to install 18 Gamesa 2.0 MW turbines, which house the transformer in the nacelle. There is no option for a pad-mount transformer for this Gamesa turbine. If Big Blue ultimately selected the GE turbines, a pad-mount transformer would be standard. The location of the transformer is strictly a function of the manufacturer's turbine design.

Furthermore, Mr. Moore's claims that the uptown transformers raise safety concerns, could "spring a leak, or explode," and/or pose a fire danger are completely unsubstantiated. The Gamesa 2.0 MW Turbines are operating safely throughout the country. Moreover, the transformers do not have oil in them and do not pose a risk of fire or an explosion as Mr. Moore alleges. Finally, all wind turbines, whether using a ground mounted or nacelle mounted transformer are subject to a Spill Prevention Control and Countermeasure Plan (SPCC) that specifically requires containment and cleanup measures in the event of a spill or release of oil. Simply, Mr. Moore's groundwater and safety concerns are unsupported.

## **3. Crane Route Changes**

Mr. Moore alleges that Big Blue violated the Site Permit because it deviated from the "route for the construction crane [that] was submitted on October 20th, 2011." Mr. Moore includes a map showing the path submitted and the alleged path actually used – highlighted in orange. Again, Mr. Moore is wrong.

First, Mr. Moore conveniently omits from his letter that the October 20, 2011 Compliance Filing he references specifically stated that "[t]he *anticipated crane path* is based off of current information and planning. The final route will be based off of on information available at that time." Again, the exact crane path is informed by conditions on the ground and landowner preferences. Second, the orange highlighted path manufactured by Mr. Moore on his second map is not the actual crane path. Several of the properties marked in orange are non-participating land owners. The project cranes and several crawler cranes, which were on site, did not all take the same route. Importantly, however, the crane paths used were pursuant to agreements with landowners and local governmental officials, where appropriate.

## **4. Noise Issues (two letters)**

Mr. Moore submitted two letters in the past week largely repeating earlier noise-related allegations that Big Blue fully addressed in its August 29, 2017 response. Big Blue will not repeat those responses here, but will briefly address Mr. Moore's claim that Big Blue never modeled noise or shadow flicker when Big Blue elected to use the Gamesa 2.0 MW Turbines – rather than GE turbines.

On October 12, 2011, Big Blue submitted a "Constraint Map and Wind Turbine Noise Analysis" for the Gamesa 2.0 MW turbines as a compliance filing. On October 5, 2011, Big Blue submitted a "Shadow Flicker Analysis" based on the Gamesa turbines. The results of these analyses showed that the "proposed wind turbine layout complies with MPCA sound requirements" and accepted shadow flicker standards. The fact is that noise and shadow flicker for the Gamesa turbines were modeled. Mr. Moore is simply making the fundamental mistake of mining the original Site Permit Application to find differences in the as-built Project to advance his arguments – without recognizing that the siting process ultimately informs the actual siting and that things change between Application submittal and the construction of a Project in the normal course. Permitting is not a static process.

Finally, as Big Blue committed in its August 29 Response, it is now in the field working to address Mr. Moore's noise concerns – whether Big Blue is required to or not. Big Blue has also committed to submitting a proposal with the Commission for approval of a post-remediation noise study that Big Blue would conduct to demonstrate on-going compliance with applicable noise standards after Siemens-Gamesa completes the planned remediation efforts this fall. Big Blue believes that its proposal to conduct a post-remediation noise study will confirm the Project's compliance with applicable noise requirements. Mr. Moore's continuing attacks on the Project are a distraction from this effort.

Thank you for your attention to this filing. Please do not hesitate to contact me with any questions or concerns.

Sincerely,



Kate Carlton

Corporate Counsel

**BIG BLUE WIND FARM, LLC**

**STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION**

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In the Matter of Big Blue Wind, LLC	)	MPUC Docket No. IP-66851/WS-10-1238
36 Megawatt Large Wind Energy Conversion	)	
System in Faribault County, Minnesota	)	<b>CERTIFICATE OF SERVICE</b>
	)	
	)	

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The undersigned hereby certifies that true and correct copies of **Big Blue Wind Farm, LLC's Response to five letters from Mr. Dan Moore** were served on this day by e-filing/e-serving to the following:

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Dated this 18th day of September, 2017

/s/ Susan A. Hartinger

Susan A. Hartinger