

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Nancy Lange	Chair
Dan Lipschultz	Commissioner
Matthew Schuerger	Commissioner
Katie Sieben	Commissioner
John Tuma	Commissioner

IN THE MATTER OF THE SITE PERMIT AMENDMENT MPUC Dockets No. IP-6907/WS-13-258
APPLICATION FOR REPOWERING THE TRIMONT
WIND I PROJECT IN MARTIN AND JACKSON COUNTIES

**REPLY COMMENTS OF THE MANKATO AREA BUILDING AND CONSTRUCTION
TRADES COUNCIL ON THE PROPOSED TRIMONT WIND I REPOWER PROJECT**

The Mankato Building and Construction Trades Council (“MBCTC”) wants, first, to thank Avangrid Renewables, LLC for committing in the company’s February 28 comments to making commercially reasonable efforts to maximize employment and utilization of responsible contractors and local skilled workforce for the Trimont Wind I Repower Project. The company’s response gives us confidence that the project will be of benefit to construction workers and local economies in the Trimont area.

Second, MBCTC wants to express our support for the arguments put forward by Avangrid concerning the company’s request for adjustments to the wind access buffer requirements that are typically imposed on wind generation facilities that are permitted by the Minnesota Public Utilities Commission (“PUC”) for the. As Avangrid’s observes in the company’s April 2 comments, the buffer distances are both conservative and subject to modification where appropriate.

In our view, flexibility will be required in the area of setbacks and buffer distances in order to maximize the clean energy and economic opportunities provided by the state’s abundant wind resources and the development of the transmission infrastructure. Trimont is one of many wind energy facilities whose useful life could be extended through cost-effective replacement of old technology with new.

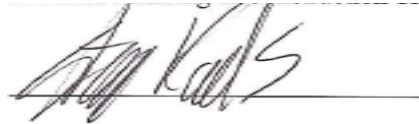
Repower projects have the potential to create hundreds of high-quality construction jobs for Minnesota workers while extending the economic benefit of local lease and property tax payments. Further, the potential to repower wind generation infrastructure that is nearing the end of its useful life makes the assets more valuable, and therefore makes investments in new wind energy generation more attractive to developers and investors.

On the other hand, if overly strict implementation of buffer and setback requirements prevent owners from fitting existing towers with larger turbines, repower projects could become more costly and difficult to execute, and wind assets could become less valuable. Such a development would hurt the interests not only of workers and the industry, but also of landowners in wind resource areas.

We believe that it is critical that the permitting process respect the property rights of landowners and protect their resources from wake losses. In this regard, however, we think that Avangrid has provided sufficient evidence that the proposed modifications will not impinge on the resources and rights of non-participating landowners. Further, we see no evidence that non-participating landowners have objected to Avangrid's proposal.

Dated: April 23, 2018

Respectfully Submitted,
Mankato Building & Construction Trades Council

A handwritten signature in black ink, appearing to read "Stacey Karels", is written over a horizontal line. The signature is cursive and somewhat stylized.

By: Stacey Karels
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