



City of Grand Meadow

112 Grand Avenue East, P.O. Box 38
Grand Meadow, Minnesota 55936
Phone 507-754-5280 • Fax 507-754-7280

July 25, 2024

Consumer Affairs Office
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul MN 55101

Re: In the Matter of the Large Wind Energy Conversion System Site Permit for the 98.9 MW Mower County Wind Facility Regarding a Complaint

PUC Docket Number(s): IP-6557/WS-06-91

As the City Administrator for the City of Grand Meadow, the number one complaint that I get from residents by far is, “When is something going to be done about those windmill blades?” They have been a topic of discussion at nearly every City Council meeting since January of 2021. The residents of this town are sick of looking at them and angry that they are still here. The Commission should order the prompt removal and proper recycling or disposal of the waste.

As the issuer of the original permit, the Commission has the authority to order the blades removed as a corrective measure, as stated in the original permit dated May 26, 2006, as well as the permit issued on August 14, 2020. In the 2020 permit, Section 15: Revocation or Suspension of Permit reads as follows:

The Commission may take action to suspend or revoke this permit upon the grounds that:

(a) a false statement was knowingly made in the application or in accompanying statements or studies required of the Permittee, and a true statement would have warranted a change in the Commission’s findings;

(b) there has been a failure to comply with material conditions of this permit, or there has been a failure to maintain health and safety standards;

(c) there has been a material violation of a provision of an applicable statute, rule, or an order of the Commission; or

(d) the Permittee has filed a petition with the Commission requesting that the permit be revoked or terminated.

MAYOR – Ryan Queensland CITY ADMINISTRATOR – James Christian
CLERK-TREASURER – Chris Hyrkas

COUNCILORS – Christy Benson, Aaron Myhre, Blayne Stejskal, Isaac Tangen

In the event the Commission determines that it is appropriate to consider revocation or suspension of this permit, the Commission shall proceed in accordance with the requirements of Minn. R. 7854.1300 to determine the appropriate action. Upon a finding of any of the above, the Commission may require the Permittee to undertake corrective measures in lieu of having this permit suspended or revoked.

The Decommissioning and Restoration section of NextEra's permit application to repower from 12/03/2019 stated in part, *"The Mower equipment supplier will coordinate with the appropriate agencies for responsible recycling of those components. The remaining materials will be reduced to transportable size and removed from the site for disposal. Materials will be disposed in a suitable disposal facility."* This was a condition of the site permit for repowering and 3 ½ years later, this condition still has not been met. The site where these blades sit is not a permitted waste facility. The failure of Rivercap to follow through on their obligations does not absolve SGRE, NextEra, or Xcel/NSPM of their responsibility to make sure the waste is properly disposed of. Xcel Energy has conveyed to me that Rivercap's subsidiary "Canvus" has stated that they will have the blades moved by year's end. We have been told numerous times that the blades will be removed by a certain date, and every deadline has passed with no action. Having been informed by Brian Donahue (Managing Partner at Canvus) that they don't have the resources at this time to move them, I have little faith that the next deadline will be met either. If the Commission chooses to take no action on this matter, what is our recourse if those blades are still here on January 1st, 2025?

Northern States Power Co. (Xcel Energy) had already filed for and received approval to acquire the Mower Wind Farm well before the repowering project, and I would think before such an acquisition, a company like Xcel would do its due diligence to make sure all the terms of the permit were being met. In the 2020 Joint Application for Northern States Power Company's (NSPM) acquisition of Mower Wind Farm, it is stated on page 11 that *"NSPM will take direct ownership of the repowered Mower Facility and acquire all of its rights and assets, including the generation facilities, interconnection rights and facilities (including the LGIA), market-based rate tariffs, contracts, books, and records."* I argue that NSPM also acquired the liabilities associated with the facility.

The Commission and the energy industry should take this issue very seriously. As more "repowering" of wind farms occurs, the amount of industrial waste will continue to increase, and energy companies need to be held accountable for how they dispose of it, as any other industry would be.

Respectfully,

A handwritten signature in black ink, appearing to read "James S. Christian". The signature is fluid and cursive, with a long horizontal stroke at the end.

James S. Christian
City Administrator
City of Grand Meadow, Minnesota