

**BEFORE THE MINNESOTA OFFICE OF ADMINISTRATIVE HEARINGS
600 NORTH ROBERT STREET
ST. PAUL, MINNESOTA 55101**

**FOR THE MINNESOTA PUBLIC UTILITIES COMMISSION
121 SEVENTH PLACE EAST SUITE 350
ST. PAUL, MINNESOTA 55101-2147**

**In the Matter of the Application of Nobles 2
Power Partners, LLC for a Certificate of
Need for the up to 260 MW Nobles 2 Wind
Project and Associated Facilities in Nobles
County, Minnesota**

MPUC Docket No. IP-6964/CN-16-289
MPUC Docket No. IP-6964/WS-17-597
OAH Docket No. 71-2500-35110

**In the Matter of the Application of Nobles 2
Power Partners, LLC for a Site Permit for
the up to 260 MW Nobles 2 Wind Project
and Associated Facilities in Nobles County,
Minnesota**

**NOBLES 2 POWER PARTNERS, LLC'S
POST-HEARING COMMENTS**

I. INTRODUCTION.

Nobles 2 Power Partners, LLC (“Nobles 2” or “Applicant”) submits the following comments regarding its proposed Nobles 2 Wind Project (“Project”) in response to the comments received through the close of the public comment period on July 11, 2018. Ten individuals spoke at the public hearing, and all spoke in support of the Project. Forty-one comment letters in support of the Project were submitted during the public comment period. Landowners within the Project submitted thirty-seven letters in support of the Project. Two State Senators and one State Representative submitted comment letters in support of the Project and the economic benefit it will have on the local economy. The Project also received letters of support from the Minnesota West Community and Technical College, Minnesota State Energy Center of Excellence and the Mankato Building and Construction Trades Council stating how the Project will help provide local jobs during construction and operation. The only other written comment received was from the

Minnesota Department of Natural Resources (“MDNR”). Accordingly, in these comments, Nobles 2 addresses MDNR’s comments concerning the Project, and Nobles 2’s ongoing response to MDNR’s comments.

Because the record supports doing so, Nobles 2 respectfully requests that the Administrative Law Judge (“ALJ”) recommend that the Commission grant a Site Permit and Certificate of Need for the Project.

II. RESPONSE TO MDNR COMMENTS.

On July 11, 2018, the MDNR issued a comment letter, in which it indicated that issues brought forth by the MDNR during Project consultation activities have been adequately addressed except for two remaining items. First, the DNR requests that a native prairie protection and management plan be prepared in consultation with the MDNR. Section 4.7 of the Draft Site Permit requires preparation of a native prairie protection and management plan in consultation with the MDNR if native prairie is identified within the site boundaries. Native prairie has been identified within the site boundaries; accordingly, Nobles 2 will prepare a native prairie protection and management plan in consultation with the MDNR. Second, in lieu of moving turbines near wildlife management areas (“WMAs”), the MDNR requested that Nobles 2 update its Bird and Bat Conservation Strategy (“BBCS”) to reflect the MDNR’s moderate risk assessment. Nobles 2 has revised its BBCS to address the MDNR’s comments on the BBCS received during the Site Permit process. Accordingly, the BBCS was revised to reflect the following:

1. Table 4-11 was revised to add overall bat passes per detection night.
2. The BBCS was revised to reflect the MDNR’s moderate risk assessment (see Sections 5.2.4 and 7.1).

3. Fatality monitoring will occur 2-days per week and will include three turbines near WMAs (see Section 7.1.1.2).
4. Section 6.1.2(1)(b) was revised to reflect that all native prairie will be avoided, except as approved by the MDNR.
5. Section 6.1(7) was revised to reflect that permanent met towers will not include guy wires.
6. MNDNR comments letters dated March 20, 2018 and July 11, 2018 were added to Appendix A.

Nobles 2 respectfully submits the attached revised BBCS to address the MDNR's comments and the above changes.

III. CONCLUSION.

The record for these proceedings supports granting Nobles 2 a Site Permit and Certificate of Need for the Project. As such, Nobles 2 respectfully requests that the ALJ recommend that the Commission grant the Site Permit and Certificate of Need for the Project.

Dated: July 25, 2018

Respectfully submitted,

/s/ Jeremy P. Duehr

Jeremy P. Duehr (#0391808)
FREDRIKSON & BYRON, P.A.
200 South Sixth Street, Suite 4000
Minneapolis, Minnesota 55402-1425
Telephone: (612) 492-7413
Fax: (612) 492-7077

Attorneys for Nobles 2 Power Partners, LLC