

August 9, 2016

Mr. Daniel P. Wolf, Executive Secretary
Minnesota Public Utilities Commission
127 7th Place East, Suite 350
Saint Paul, MN 55101-2147

RE: Comments on Petition for Site Permit Transfer
Black Oak Wind Farm (Docket No. IP-6853/WS-10-1240), Getty Wind Project (Docket
No. IP-6866/WS-11-831), Joint Application for Certificate of Need (IP 6853 and IP
6866/CN-11-471

Dear Mr. Wolf:

On January 1, 2013, the Minnesota Public Utilities Commission (Commission) issued LWECS site permits to both the Black Oak and Getty Wind projects. The Black Oak and Getty projects are adjacent to one another in Stearns County. Throughout the permitting process, Black Oak Wind, LLC (Black Oak) and Getty Wind Company, LLC (Getty) (collectively, "Permittees") noted that, while the projects had originated independent of one another, there was a possibility that the two may eventually be consolidated as one. On November 14, 2014, Getty notified the Commission that Black Oak had acquired Getty as a wholly-owned subsidiary.

On July 20, 2016, the Permittees requested that the site permit for the Getty Wind Project be transferred from Getty to Black Oak to facilitate the oversight of both projects and to merge Getty with and into Black Oak, such that Black Oak will be the surviving entity.

On July 26 2016, the Commission issued a Notice requesting comments on the Permittees' joint petition for a transfer of the Getty Site Permit to Black Oak. In its notice, the Commission specifically requested that comments address whether the Commission should authorize the site permit transfer and whether there are any relevant project-related issues of concerns.

The Department of Commerce (Department) Energy Environmental Review and Analysis (EERA) staff is not aware of any existing actions or conditions which should preclude the Commission's approval of the proposed permit transfer. As Black Oak Wind representatives have been responsible for the compliance filings for both projects for some time, EERA staff does not anticipate any material change in responsibility for compliance filings and responsiveness to questions regarding the projects would result from the proposed transfer.

The Permittees' proposal does not request that the projects be consolidated under a single permit. EERA staff recommends that, whatever the Commission's decision on the proposed permit transfer, separate permits continue for each project.

Correspondence should be addressed to:

Sean Wazlaw
Sr. Environmental Permitting & Safety Advisor
Sempra U.S. Gas & Power
488 8th Avenue, HQ12
San Diego, CA 92101
swazlaw@semprausgp.com

EERA staff is available to answer any questions the Commission may have.

Sincerely,

A handwritten signature in cursive script that reads "Suzanne Steinhauer". The signature is written in black ink and is positioned below the word "Sincerely,".

Suzanne Steinhauer, Environmental Review Manager
Energy Environmental Review and Analysis

cc: Bret Eknes, Commission Staff
Tricia DeBleeckere, Commission Staff
John Wachtler, EERA Director