

January 5, 2018

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

Re: Application for Site Permit Repowering
Trimont Wind Project
Docket No. IP6907/WS-13-258

Dear Mr. Wolf:

Attached are the comments of the Minnesota Department of Commerce Energy Environmental Review and Analysis (EERA) staff on Application completeness and the review process in the following matter:

The Application of Trimont Wind I, LLC for a Large Wind Energy Conversation System Site Permit Amendment for Repowering the 100.5 MW Trimont Wind Project in Martin and Jackson Counties


Trimont Wind I, LLC has submitted a Site Permit Amendment Application pursuant to Minnesota Rule 7854.1300 to retrofit the existing Trimont Wind Project and repower the Project as an 107.2 MW LWECS.

This filing was made on December 21, 2017, by:

Adam Sokolski
Avangrid Renewables
527 Marquette Avenue, Suite 1600
Minneapolis, MN 55402

EERA suggests the Site Permit Amendment Application contains the information necessary for Commission review, and recommends the Commission review the Application using the process described herein. EERA staff is available to answer any questions the Commission may have.

Sincerely,



David Birkholz, Environmental Review Manager
Energy Environmental Review and Analysis
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COMMENTS AND RECOMMENDATIONS OF THE
MINNESOTA DEPARTMENT OF COMMERCE
ENERGY ENVIRONMENTAL REVIEW AND ANALYSIS

DOCKET NO. IP6907/WS-13-258

DateJanuary 5, 2018
EERA Staff..... David Birkholz (651) 539-1838

In the Matter of the Application of Trimont Wind I, LLC for an LWECS Site Permit Amendment to Repower the 100.5 MW Trimont Wind Project in Martin and Jackson Counties

Issues Addressed: *These comments and recommendations address:*

1. *Whether the site permit amendment application is complete; and*
2. *How the amendment review process might best proceed.*

Additional documents and information can be found at

<https://mn.gov/commerce/energyfacilities/Docket.html?Id=5208> or on eDockets at
<http://www.edockets.state.mn.us/EFiling/search.jsp> (Year 13, Number 258).

This document can be made available in alternative formats; e.g., large print or audio tape by calling (651) 539-1530.

Introduction and Background

Trimont Wind I, LLC (Trimont Wind or Applicant), a subsidiary of Avangrid Renewables, LLC (formerly Iberdrola), currently operates an 100.5-megawatt (MW) Large Wind Energy Conversion System (LWECS) located in Martin and Jackson counties. Trimont Wind received a Certificate of Need (CN) from the Minnesota Public Utilities Commission (Commission) on June 2, 2004. The Minnesota Environmental Quality Board (EQB) issued Trimont Wind a Site Permit on June 17, 2004 and amended it on October 21, 2004.¹ The Site Permit expires June 30, 2034. The facility includes 67 1.5 MW General Electric (GE) turbines and commenced commercial operation in December 2005.

On December 21, 2017, Trimont Wind I, LLC filed an Application to amend the Site Permit.² The Applicant intends to repower (retrofit, in its own terms) the LWECS to improve efficiency and extend the useful life of the facility beyond 2034. Trimont Wind has a power purchase agreement (PPA) with Great River Energy for the plant's current production. They would pursue a new PPA with a Minnesota customer when the current agreement expires.

¹ Trimont Wind has included a copy of the Site Permit as an attachment to the Application.

² "Site Permit Amendment Application," Trimont Wind I, LLC, December 21, 2017,
<https://mn.gov/commerce/energyfacilities/resource.html?Id=34762>.

Project Location

The Project is located approximately three miles west of the city of Trimont, in Cedar Township in Martin County and Kimball Township in Jackson County. The proposed Project boundaries are the same as those authorized in the 2004 Site Permit. The Project is located in an area that has seen extensive development of LWECS over the 12-plus years since The Trimont facility commenced operations; with Avangrid's own Elm Creek I and Elm Creek II projects immediately adjacent to the south and west, and ENEL's Odell Wind Project immediately adjacent to the North.

Project Description

The current Facility Boundary, encompassing approximately 22,400 acres, would remain the same under an amended permit. The new Project would consist of retrofitting the existing turbines by:

- Replacing turbine blades, increasing the rotor diameter from 77 meters to 91 meters,
- Replacing equipment within the nacelles (e.g., gearboxes and drive shafts), and
- Updating the electronic controls.

The result would be to increase the output of each turbine from 1.5 to 1.6 MW, which would increase the nameplate capacity of the Facility from 100.5 MW to 107.2 MW. There would be no changes to turbine locations, turbine towers, meteorological towers, or underground electrical collection system outside of the substation.

The Applicant's goal is to commence construction of the Project on a schedule to achieve commercial operation by December 31, 2020.

Regulatory Process and Procedures

A site permit from the Commission is required to construct an LWECS, which is any combination of wind turbines and associated facilities with the capacity to generate five megawatts or more of electricity. This requirement became law in 1995. The Minnesota Wind Siting Act is found at Minnesota Statutes Chapter 216F. The rules to implement permitting requirements for LWECS are in Minnesota Rule 7854. The Statute and Rule are designed to guarantee LWECS are sited "in an orderly manner compatible with environmental preservation, sustainable development, and the efficient use of resources."³

Over the past year, the Commission and the Minnesota Department of Commerce Energy Environmental Review and Analysis (EERA) staff have been meeting together, and with interested utilities, to discuss repowering existing windfarms. Repowering is a means to fulfill all three tenets of the law's purpose by rebuilding on a previously impacted site, preserving the existing compatible land uses of agriculture and energy production, and utilizing and improving upon facilities that have already been determined by the Commission as making efficient use of resources.

Repowering may take the form of a "full repowering," where turbines are decommissioned and replaced within the site boundary, or a "partial repowering," where, as in the current case, existing turbines are retrofitted to improve efficiency and extend their life cycle. The process of review in either case would be for the Permittee to file an Application for a Permit Amendment to approve the repowering.

³ Minnesota Statute [216F.03](#); Minnesota Rule [7854.0200](#)

The Commission has authority to amend a Site Permit at any time if it has good cause.⁴ The process for an amendment generally includes a comment period and a hearing before the Commission. Commission and EERA staffs agree that the additional step of a public meeting in the Project area should also be required in the case of repowering. As discussed by staffs, and presented at a Commission Planning Meeting in 2017, the following Process has been outlined to review either full or partial repowering:

Review Process for Repowering	
Day	Process Step
-	Amendment Application Filed
10	EERA Recommendations on Application Completeness and Process
15	Commission Notice for Public Information Meeting and Comment Period
40	Public Information Meeting
50	Public and Agencies Comments Due
64	EERA Recommendations on the Permit Amendment
85-100	Commission Agenda Meeting for Decision

EERA Staff Analysis and Comments

Commission and EERA staffs have agreed that an Amendment Application for repowering should provide the same information that would be required for current Site Permit applications.⁵ This guarantees the Applicant will have updated any environmental information from its original application and conducted all required surveys and modeling expected by applicants for new sites.

Application Completeness

Trimont developed its Amendment Application with the assistance of the EERA guidance document⁶ for LWECS permits. This guidance for site permitting provides applicants and preparers of LWECS applications with information on how to prepare a complete site permit application, including information on the permitting process, pre-application consultation, current policies, guidelines and expectations as to necessary study standards and how to submit an application.

Trimont submitted a draft Application for review and met with EERA on October 17, 2017, to discuss the need for any additional information. EERA also reviewed a second draft and met with the Applicant on November 3, 2017, to provide additional comments and recommendations. The Applicant edited and supplemented the Application following EERA's reviews before making their official filing on December 21, 2017. EERA finds the efiled Application addresses the comments and recommendations provided to the Applicant.

Recommendations

EERA confirms that filing requirements discussed among Commission and EERA staff have been met. EERA recommends that the Application be reviewed as per the "Review Process for Repowering" mentioned above, beginning with noticing and holding a public information meeting as soon as arrangements can be made.

⁴ Minnesota Rule [7854.1300 Subp. 2](#)

⁵ Minnesota Rule [7854.0500](#)

⁶ [Application Guidance for Site Permitting of Large Wind Energy Conversion Systems in Minnesota](#), Department of Commerce EERA, August 5, 2010.