



414 Nicollet Mall  
Minneapolis, MN 55401

May 10, 2021

**VIA ELECTRONIC FILING**

Mr. Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 Seventh Place East, Suite 350  
Saint Paul, MN 55101-2147

**Re:** In the Matter of the Application for an Amendment to Site Permit to Repower the 201 MW Nobles Wind Farm in Nobles County, Minnesota  
MPUC Docket No. IP-6646//WS-09-584  
**Comments**

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, (“Xcel Energy”) submits these initial comments to provide updates related to its Application for an Amendment to Site Permit (“Application”) to Repower the 201 MW Nobles Wind Farm in Nobles County, Minnesota (“Project”). Xcel Energy intends to respond to any public comments during the Minnesota Public Utilities Commission (“Commission”) reply comment period.

**Wind Access Buffer Setback Waiver Update**

In its February 26, 2021, Site Permit Amendment Application, Xcel Energy requested that the Commission waive the wind access buffer setback for 63 of the 134 turbines to allow Xcel Energy to repower the Project. As described in Section 7.0 of the Application, Xcel Energy has been in contact with all the landowners who own parcels overlapped by the wind access buffer setback based on the larger 91-meter and 97-meter blades proposed for the Project. Since filing the Application, Xcel Energy has continued to engage in good faith negotiations with landowners and has successfully obtained additional wind rights, reducing the number of waiver requests to 37 turbines. Attachment A contains the updated list of turbines and related parcels for which Xcel Energy is currently requesting waivers.<sup>1</sup>

Xcel Energy has been transparent with landowners throughout the process that it would seek wind access setback waivers from the Commission for any parcels for which it was unable to negotiate voluntary wind easements. Despite Xcel Energy’s good faith negotiations, there remain landowners

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<sup>1</sup> This updated waiver request was shared with the public prior to the Commission’s Public Meeting held April 29, 2021. *See* Document ID 20214-173576-01.

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who do not want to sign any agreement that encumbers their property or who are otherwise disinclined to sign an agreement.

Given the comprehensive outreach and responses to date and the timeframe for Project construction, Xcel Energy has sent a final written offer by certified mail to all landowners who have not yet executed a wind easement. An affidavit of mailing documenting this mailing is included as Attachment B.

As shown on the map included as Attachment C, the overlapping wind rights needed from the parcels listed in Attachment A are *de minimus*. The Nobles Wind Farm has been in operation since 2010, and these landowners have not further developed the wind rights on their parcels and most are constrained from doing so based on the size of the parcels and the existing infrastructure in the area.

To ensure that Xcel Energy can execute the Project and realize the benefits approved by the Commission in Docket No. E,002/M-20-620, Xcel Energy respectfully requests that the Department of Commerce, Energy Environmental Review and Analysis recommend, and the Commission approve, waivers of the wind access buffer setback for the turbines listed in Attachment A. Xcel Energy will continue to negotiate with interested landowners. If additional agreements are reached, Xcel Energy will provide the Commission with an update on requested waivers prior to its final decision on this matter.

### **Foundation Assessment**

Section 5.3 of the Application discussed that a structure assessment was being conducted by Barr Engineering to determine if the existing foundation design could accommodate the GE 1.6 sle turbine with either 91-meter or 97-meter blades and meet the 2020 industry design standards. The Application discussed the potential to add structural support, including a reinforced concrete collar around the base of the foundation or engineered soil, depending on the findings of the assessment.

Barr Engineering has completed this assessment and concluded that the foundations in their current configuration are adequate to support the new GE turbines with 20 years of fatigue cycles and time, and recommended future structural health monitoring on five specific turbines. Xcel Energy plans to implement these recommendations. The *Nobles Wind Energy Facility Wind Turbine Foundation Evaluation Report Repowering with a GE 1.6-91 and GE 1.6-97* is included as Attachment D.

### **Conclusion**

Thank you for the opportunity to provide this additional information. Please contact me at matthew.a.langan@xcelenergy.com if you have any questions.

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Sincerely,

*/s/ Matt Langan*

Matt Langan  
Principal Agent, Siting and Land Rights  
Xcel Energy

**In the Matter of the Application for an  
Amendment to Site Permit to Repower the 201  
MW Nobles Wind Farm in Nobles County,  
Minnesota**

**MPUC Docket No.  
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**CERTIFICATE OF SERVICE**

Erin E. Daniels certifies that on the 10th day of May 2021, she e-filed the true and correct copy of Xcel Energy's Initial Comments via edockets ([www.edockets.state.mn.us](http://www.edockets.state.mn.us)). Said document was also served as designated on the Official Service List on file with the Minnesota Public Utilities Commission and as attached hereto.

*/s/ Erin E. Daniels*

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| Sharon         | Ferguson                       | sharon.ferguson@state.mn.us          | Department of Commerce             | 85 7th Place E Ste 280<br><br>Saint Paul, MN 551012198       | Electronic Service | Yes               | OFF_SL_9-584_1    |
| Ian            | Krygowski                      | Ian.Krygowski@edf-re.com             | EDF Renewable Energy               | 10 2nd Street, Ste 107<br><br>Minneapolis, MN 55413          | Electronic Service | No                | OFF_SL_9-584_1    |
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| Will           | Seuffert                       | Will.Seuffert@state.mn.us            | Public Utilities Commission        | 121 7th PI E Ste 350<br><br>Saint Paul, MN 55101             | Electronic Service | Yes               | OFF_SL_9-584_1    |
| Lynnette       | Sweet                          | Regulatory.records@xcelenergy.com    | Xcel Energy                        | 414 Nicollet Mall FL 7<br><br>Minneapolis, MN 554011993      | Electronic Service | No                | OFF_SL_9-584_1    |