

July 30, 2021

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Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
127 7th Place East, Suite 350
St. Paul, MN 55101-2147

Re: In the Matter of the Applications of Walleye Wind, LLC for a Certificate of Need and Site Permit for the up to 110.8 MW Walleye Wind Project in Rock County

OAH Docket No. 5-2500-37275
MPUC Docket No. IP7026/CN-20-269,
MPUC Docket No. IP7026/WS-20-384

Dear Mr. Seuffert:

Department of Commerce Energy Environmental Review and Analysis (EERA) staff reviewed the Findings of Fact, Conclusions of Law, and Recommendations (report) issued by Administrative Law James Mortenson (ALJ) for the Walleye Wind Project dockets identified above. The report provides a thorough analysis of the record; however, EERA does have exceptions (in the form of technical corrections) to findings 151 and 182.

Finding 151. EERA recommends removal of the last sentence in Finding 151 regarding the status of the Dodge County Wind Project. On May 7, 2021, Dodge County Wind, LLC notified the Commission of its intent to petition the Commission for a Certificate of Need for an up to 280 MW Large Wind Energy Conversion System and Associated 161 kV Transmission Line in Dodge and Mower counties in Minnesota.¹

151. The DOC-DER reviewed the record in MMPA's 2019-2033 Integrated Resource Plan in Docket No. ET6133/RP-18-524, dated July 30, 2018. At that time, MMPA secured a 30-year wind PPA with NextEra for 170 MW of generating capacity from the Dodge County Wind Farm, which would have generated approximately 600,000 MWh of renewable energy per year.²¹⁵ However, in that proceeding, NextEra indicated that it would not move forward with the project and the Commission allowed Dodge County Wind, LLC, to withdraw its high-voltage transmission line route permit application and suspended the certificate of need and site permit applications.²¹⁶ ~~To date, the Commission has not been updated regarding Dodge County Wind, LLC's plans to submit a revised project proposal.~~²¹⁷

Finding 182. EERA recommends clarifying that the percentage of local labor used to construct the project is an estimate prepared by Walleye Wind.

¹ Dodge County Wind, LLC, In the Matter of the Application of Dodge County Wind, LLC for a Certificate of Need for the up to 280 MW Large Wind Energy Conversion System and Associated 161 kV Transmission Line in Dodge, Mower and Steele County (Docket No. IP6981/CN-20-865) *Petition for Exemption from Certain Certificate of Need Requirements*, May 7, 2021 (eDocket No: [20215-173982-01](#))

182. The Project will benefit the local economy through landowner lease payments, production taxes, jobs (both temporary construction and permanent operations and maintenance jobs), and other local spending.²⁴⁹ Walleye Wind estimates that approximately ~~Approximately~~ 60 percent of the estimated 200 jobs created during construction will be staffed by locals.²⁵⁰ There is no evidence the local economy will enjoy these benefits if the Project is not constructed.²⁵¹

EERA Staff concurs with the recommendation of the ALJ for issuance of a Site Permit to Walleye Wind, LLC to construct and operate the up to 109.7 MW Walleye Wind Project in Rock County, and that the issued Site Permit contain the conditions as set forth in the foregoing Findings of Fact and Conclusions of Law.

EERA staff is available to answer any questions you may have.

Sincerely,

/s/ Suzanne Lamb Steinhauer

Suzanne Steinhauer
Environmental Review Manager
Energy Environmental Review and Analysis

cc: Louise Miltich, Energy Environmental Review and Analysis
Michael Kaluzniak, Public Utilities Commission