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January 12, 2022

Via Electronic Filing

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

Re: ***In the Matter of the Application of Dodge County Wind, LLC for a Certificate of Need for the up to 259 MW Large Wind Energy Conversion System in Dodge, Mower and Steele Counties, Minnesota,*** **Docket No. IP-6981/CN-20-865 - Amended Certificate of Need Application**

Dear Mr. Seuffert:

Enclosed for filing in the above-referenced docket is the amended application of Dodge County Wind, LLC ("DCW") for a Certificate of Need for an up to 259 MW Large Wind Energy Conversion System in Dodge, Mower and Steele Counties, Minnesota ("Amended CON Application"). The Amended CON Application submitted under this cover letter amends and updates DCW's Certificate of Need application filed on September 15, 2021.

To the extent applicable to DCW's application for a Certificate of Need, the Amended CON Application reflects updates made to DCW's accompanying amended Site Permit and Route Permit applications, which will be filed in Docket Nos. IP6981/WS-20-866 and IP6981/TL-20-867, respectively.[1]

A copy of this filing is being served upon the persons on the official service list of record, in accordance with the attached certificate of service. The summary of filing included will be served upon the general service list.

Thank you for your attention to this Filing. Please do not hesitate to contact me with any questions or concerns.

[1] While only discrete parts of the original Application have changed, DCW is submitting the entire Amended CON Application in a single filing to avoid any need by interested participants or members of the public to cross reference the previously filed Application.

Respectfully Submitted,

Stinson LLP

/s/ Brian M. Meloy

Brian M. Meloy

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

In the Matter of the Application of Dodge County Wind, LLC for a Certificate of Need for the up to a 259 MW Large Wind Energy Conversion System in Dodge, Mower and Steele Counties, Minnesota,	)	**Docket No. IP7026/CN-20-865** ***CERTIFICATE OF SERVICE***

The undersigned hereby certifies that a true and correct copy of **Dodge County Wind, LLC's Amended Certificate of Need,** has been served today by e-mail and/or U.S. Mail to the following:

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Dated this 12th day of January, 2022

/s/ Joshua M. Feit
Joshua M. Feit

Amended Application for Certificate of Need
Dodge County Wind, LLC

Large Wind Energy Conversion System

MPUC Docket Number: IP6981/CN-20-865

January 12, 2022

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Completeness Checklist

Rule	Required Information	Application Section(s)	Exemption
7849.0120	**Criteria – Probable result of denial would be an adverse effect upon the future adequacy, reliability, or efficiency of energy supply to the applicant, the applicant's customers, or to the people of Minnesota and neighboring states**	5.1	--
A(1)	Accuracy of the applicant's forecast	5.1, 7.0	No
A(2)	Effects of applicant's existing or expected conservation programs and state and federal conservation programs	5.1, 9.0	No
A(3)	Effects of promotional practices on demand	5.1, 6.3.1.11	No
A(4)	Ability of current and planned facilities, not requiring certificates of need, to meet future demand	5.1, 6.2.4.5	No
A(5)	Effect of proposed facility in making efficient use of resources	5.1	No
7849.0120	**Criteria – A more reasonable and prudent alternative has not been demonstrated**	5.2	--
B(1)	Appropriateness of size, type, and timing	5.2.1	No
B(2)	Cost of facility and its energy compared to costs of reasonable alternatives	5.2.2	No
B(3)	Effects of the facility upon natural and socioeconomic environments compared to the effects of reasonable alternatives	5.2.3	No
B(4)	Expected reliability compared to reasonable alternatives	5.2.4	No
7849.0120	**Criteria – Facility will provide benefits to society**	5.3	--
C(1)	Relationship of proposed facility to overall state energy needs	5.3.1	No
C(2)	Effects of facility upon the natural and socioeconomic environments compared to the effects of not building the facility	5.3.2	No
C(3)	Effects of facility in inducing future development	5.3.3	No
C(4)	Socially beneficial uses of the output of the facility, including to protect or enhance environmental quality	5.3.4	No
D	Facility or suitable modification will not fail to comply with relevant policies, rules, and regulations of other state and federal agencies and local governments	5.4	No
7849.0210	**Filing Fees and Payment Schedule**	2.0	No
7849.0240	**Need Summary and Additional Considerations**	4.0	--

Rule	Required Information	Application Section(s)	Exemption
Subp. 1	Need Summary – summary of major factors justifying need for facility	4.1	No
Subp. 2(A)	Additional Considerations – Socially beneficial uses of the output of the facility, including to protect or enhance environmental quality	4.2.1	No
Subp. 2(B)	Additional Considerations – Promotional activities that may have given rise to the demand for the facility	4.2.2	Partial
Subp. 2(C)	Additional Considerations – Effects of the facility in inducing future development	4.2.3	No
7849.0250	**Proposed LEGF and Alternatives Application**	6.0	--
A(1)	Description – Nominal generating capability and effects of economies of scale on facility size and timing	6.1.1	No
A(2)	Description – Anticipated operating cycle, including annual capacity factor	6.1.2	No
A(3)	Description – Type of fuel, reason for selection, projection of availability over life of facility, and alternative fuels	6.1.3	No
A(4)	Description – Anticipated heat rate	6.1.4	No
A(5)	Description – Anticipated areas where facility will be located	6.1.5	No
B(1)	Discussion of Alternatives – Purchased power	6.2.1	Yes
B(2)	Discussion of Alternatives – Increased efficiency of existing facilities	6.2.2	Partial
B(3)	Discussion of Alternatives – New transmission lines	6.2.3	Partial
B(4)	Discussion of Alternatives – New generating facilities of a different size and energy resource	6.2.4	Partial
B(5)	Discussion of Alternatives – Reasonable combination of alternatives	6.2.5	Partial
C	Proposed Facility and Alternatives	6.3	--
C(1)	Capacity cost in current dollars per kilowatt	6.3.1.1	Yes - Limited
C(2)	Service life	6.3.1.2	Yes - Limited
C(3)	Estimated average annual availability	6.3.1.3	Yes - Limited
C(4)	Fuel costs in current dollars per kilowatt hour	6.3.1.4	Yes - Limited
C(5)	Variable operating and maintenance costs in current dollars per kilowatt hour	6.3.1.5	Yes - Limited

Rule	Required Information	Application Section(s)	Exemption
C(6)	Total cost in current dollars of a kilowatt hour provided by it	6.3.1.6	Yes - Limited
C(7)	Estimate of its effect on rates system-wide and in Minnesota	6.3.1.7	Partial
C(8)	Efficiency, expressed for a generating facility as the estimated heat rate	6.3.1.8	Yes - Limited
C(9)	Majoring assumptions made in providing information in sub-items (1) to (8), including projected escalation rates for fuel costs and operating and maintenance costs, as well as projected capacity factors	6.3.1.9	Yes - Limited
D	System Map	6.3.1.10	Partial
E	Other relevant information about the facility and alternatives that may be relevant to a determination of need	--	
7849.0270	**Peak Demand and Annual Consumption Forecast**	7.0	Partial
7849.0280	**System Capacity**	8.0	Partial
7849.0290	**Conservation Programs**	9.0	Partial
7849.0300	**Consequences of Delay**	10.0	Partial
7849.0310	**Environmental Information – Provide environmental data in response to part 7849.0250, Item C, or 7849.0260, Item C, and information as requested in part 7849.0320 to 7849.0340**	11.0	No
7849.0320	**Generating Facilities**	12.0	No
A	Estimated range of land requirements, including water storage, cooling systems, and solid waste storage	12.1	No
B	Estimated amount of vehicular, rail, and barge traffic generated by construction and operation of facility	12.2	No
C	Fossil-fuel facilities – Fuel	12.3.1	No
D	Fossil-fuel facilities – Emissions	12.3.2	No
E	Water Use for Alternate Cooling Systems	12.4	No
F	Sources and types of discharges to water	12.5	No
G	Radioactive releases	12.6	No
H	Types and quantities of solid wastes in tons/year	12.7	No
I	Sources and types of audible noise attributable to facility operation	12.8	No
J	Estimated work force required for facility construction and operation	12.9	No

Rule	Required Information	Application Section(s)	Exemption
K	Minimum number and size of transmission facilities required to provide a reliable outlet for the generating facility	12.10	No
7849.0330	**Transmission Facilities**	--	Yes
7849.0340	**No-Facility Alternative**	6.2.4.7	Partial

1.0 INTRODUCTION

Dodge County Wind, LLC[1] (DCW or Applicant) respectfully submits this application for a certificate of need (CON) to the Minnesota Public Utilities Commission (Commission) in accordance with Minnesota Statutes (Minn. Stat.) § 216B.243 and Minnesota Rules (Minn. R.) Chapter 7849.

Although the Applicant does not own or have a direct financial interest in any other wind farms located in Minnesota, NEER has an indirect ownership and financial interests in:

- The 62.3-megawatt (MW) Marshall Solar Energy Project in Lyon County (in operation);
- The 109-MW Buffalo Ridge Wind Project (approved by Commission) in Lincoln County;
- The 109.7-MW Walleye Wind Project (under review by Commission) in Rock County;
- The 78.8-MW of Minnesota Community Solar Gardens Project in various counties (in operation); and
- The 15-MW Gopher Battery Storage Project in Anoka County (in operation).

1.1 The DCW Project

DCW respectfully requests that the Commission issue a CON for the up to 259 MW DCW Project and its associated facilities, including a collector substation and an approximately 26.8-mile 161 kilovolt (kV) generation tie line (Project).[2] The wind generation portion of the Project is a "large energy facility" as defined in Minn. Stat. § 216B.2421, subd. 2(1).[3]

DCW is an independent power producer (IPP) that will develop, construct, own, and operate the Project. The DCW Wind Project includes turbines, a project collector substation, collection lines, an operation and maintenance (O&M) building, a permanent meteorological (MET) tower, and gravel access roads and the approximately 26.8-mile 161 kV generation tie line. The Wind Project site is located on 28,348 acres (44.3 square miles) in western Dodge County and eastern Steele County in southeastern Minnesota, immediately southwest of Dodge Center and north of Blooming Prairie, Minnesota, and the associated generation tie line is located in Dodge and Mower Counties.

The Project's 259 MW capacity will be generated using no more than 79 wind turbines. The total capacity will be generated using a combination of the following General Electric (GE) models:

[1] Dodge County Wind, LLC is an indirect wholly-owned subsidiary of NextEra Energy Resources, LLC (NEER). NEER, through its affiliates, operates approximately 18 gigawatts of wind energy through more than 135 facilities across North America.

[2] Concurrent with this filing, DCW will be submitting a Route Permit Application for 161 kV transmission line in Docket No. IP6981/TL-20-867, and a Site Permit Application in Docket No. IP6981/CN-20-866.

[3] Minn. Stat. § 216B.2421, Subd. 2(1) defines a "large energy facility" for which a CON is required as "any electric power generating plant or combination of plants at a single site with a combined capacity of 50,000 kilowatts or more **and transmission lines directly associated with the plant that are necessary to interconnect the plant to the transmission system**." Emphasis added.

eight GE 3.4 MW wind turbines with 140-meter (459.3-foot) rotor diameter (RD) and 81-meter (265.7-foot) hub height, 60 GE 3.4 MW wind turbines with 140-meter (459.3-foot) RD and 98-meter (321.5-foot) hub height, and 11 GE 2.52 MW wind turbines with 116.5-meter (382.2-foot) RD and 90-meter (295.3-foot) hub height. The associated 161 kV generation tie line connects the wind generation facility to the electric transmission grid at the existing Great River Energy (GRE) Pleasant Valley substation. The estimated commercial operations date for the Project, including the associated facility, is December 31, 2023.

DCW has entered into a power purchase agreement (PPA) with GRE. In the PPA, GRE agreed to purchase the entire output of the Project for a 30-year term. The Project, as a generator of wind energy, qualifies as an "eligible energy technology" for the purposes of the Minnesota Renewable Energy Standard (RES), as set forth in Minn. Stat. § 216B.1691, and, therefore, will serve as a significant renewable generation addition to assist GRE exceed its RES requirements, and achieve its own voluntary renewable energy goals.

1.2 Project Contacts

The authorized representatives for the Applicant are:

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Mark Lennox
January 10, 2022

2.0 FEES AND PAYMENT SCHEDULE (MINN. R. 7849.0210)

Table 1. Certificate of Need Application Schedule of Payments

Fee Calculation	Amount
Fee Calculation Equation	$10,000 + ($50×MW)
Due with CON Application	$5,736.50
Due 45 Days after Application Submittal Date	$5,736.50
Due 90 Days after Application Submittal Date	$5,736.50
Due 135 Days after Application Submittal Date	$5,736.50
Total Calculated Fee	**$22,946**

3.0 FILING REQUIREMENT EXEMPTION REQUEST

Minn. R. Ch. 7849 permits applicants to request exemptions from filing requirements that are not applicable to a project. Specifically, an applicant may be exempted from providing certain information if the applicant requests an exemption in writing that shows that the data requirement is either unnecessary to determine the need for the proposed facility or may be satisfied by submitting another document. Minn. R. 7849.0200, subp. 6.

On May 7, 2021, DCW filed with the Commission a request for exemptions from certain CON filing requirements based on DCW's status as an IPP. This request is included with this application as **Appendix A**. On July 13, 2021, the Commission issued an Order (attached as **Appendix B**) granting the following:

1. Determined that the following data requirements are not applicable:

    a. 7849.0260: Proposed Large High Voltage Transmission Line and Alternatives Application

2. Approved the following exemptions conditioned upon Dodge County providing alternative data:

    a. 7849.0240, subp. 2 (B): Promotional Activities;
    b. 7849.0250 (B) 1-5: Description of Certain Alternatives;
    c. 7849.0250 (C) 7: Effect of Project on Rates System-wide;
    d. 7849.0250 (D): Map of Applicant's System;
    e. 7849.0270: Peak Demand and Annual Consumption Forecast;
    f. 7849.0280: System Capacity;
    g. 7849.0300: Consequences of Delay—System; and
    h. 7849.0340: The Alternative of No Facility.

3. Approved the following exemptions as proposed:
    a. 7849.0250 (C) 1 to 6, 8 and 9: Availability of Alternatives to the Facility;
    b. 7849.0290: Conservation Programs; and
    c. 7849.0330: Alternatives Involving an LHVTL

4.0 NEED SUMMARY AND ADDITIONAL CONSIDERATIONS (MINN. R. 7849.0240)

4.1 Need Summary (Minn. R. 7849.0240, subpart 1)

The Project is needed to assist GRE in maintaining RES compliance, and delivering reliable and affordable wholesale electricity to the regional electricity market and its member-owner cooperatives. The Next Generation Energy Act of 2007 requires that utilities in Minnesota provide 25% of their total retail electric sales from eligible renewable resources by 2025.[4] GRE met the 25% RES requirement 8 years early through voluntary incremental retirement of renewable energy certificates. Additionally, the Minnesota legislature has specified aggressive goals for the reduction of greenhouse gas emissions across all sectors, including the electric sector. The legislature's specific goal is to "reduce statewide greenhouse gas emissions across all sectors producing those emissions to a level at least 15 percent below 2005 levels by 2015, to a level at least 30 percent below 2005 levels by 2025, and to a level at least 80 percent below 2005 levels by 2050".[5] Between the RES and state greenhouse gas emission reduction goals, additional renewable resources will continue to be needed in Minnesota. Therefore, Project will serve to meet this broader legislative need as well as the specific electricity and renewable energy needs of GRE.

4.2 Additional Considerations (Minn. R. 7849.0240, subpart 2)

4.2.1 Socially Beneficial Uses of the Output

The Project will produce affordable, clean, renewable energy that will help GRE to: (1) maintain its RES requirements; (2) meet its voluntary 50% renewable energy goal by 2030; (3) meet its energy demands; and (4) meet its commitment to reducing carbon emissions affordably and reliably. The Project will produce enough clean, renewable energy to meet the full electrical needs of approximately 70,000 Minnesota households annually. In addition, as described in greater detail below, the local economy will benefit from the landowner lease payments for turbines, production taxes, the income from temporary and permanent jobs associated with the Project, and local spending.

4.2.2 Promotional Activities that May Have Given Rise to the Demand for the Facility

DCW was granted an exemption from the requirement of Minn. R. 7849.0240, subp. 2(B), conditioned on GRE providing equivalent data on its promotional activities. GRE, however, has indicated that it has conducted no promotional activities associated with the Project, and, therefore, there is no information to submit.

[4] Minn. Stat. § 216B.1691.
[5] Minn. Stat. § 216H.02, subd. 1.

4.2.3 Effects of the Facility on Inducing Future Development

The Project is not expected to directly induce development in Dodge, Steele, or Mower Counties. However, the Project will positively impact the County by adding infrastructure, temporary and permanent jobs, increasing the counties' tax base, and providing lease payments to Project participants. For example, landowners involved in the Project will benefit from annual lease payments. The Project will pay a Wind Energy Production Tax to the local units of government of $0.0012 per kilowatt-hour (kWh) of electricity produced. This would result in an annual Wind Energy Production Tax ranging from approximately between $870,000 and $1,180,000 annually in Dodge and Steele Counties. During the first year, partial energy generation during the startup months may lead to energy production taxes not being maximized when the facility is not running at optimal capacity and may also only include a partial calendar year of energy production.

In addition, communities near the Project are also expected to receive positive economic benefits as construction will necessitate the need for temporary and full-time positions. During construction of the Project, approximately 400 temporary construction personnel will be required for the wind project, and 40 temporary construction personnel will be required for the generation tie line project. Over the duration of construction (approximately 5-7 months), these personnel will reside in or around Dodge, Steele, and Mower Counties. DCW has committed to using reasonable efforts to employ at least 60 percent local labor during construction and to use union workers for skilled roles such as engineering and electrical construction. During the operations phase of the Project, which is expected to be 30 years, a limited number of permanent O&M staff will support the Project operations locally.

5.0 CERTIFICATE OF NEED CRITERIA (MINN. R. 7849.0120)

The Commission has established criteria to assess the need for a large electric generating facility (LEGF) in Minn. R. 7849.0120. The Commission must grant a CON to an applicant upon determining that:

> A. [T]he probable result of denial would be an adverse effect upon the future adequacy, reliability, or efficiency of energy supply to the applicant, to the applicant's customers, or to the people of Minnesota and neighboring states;
>
> B. [A] more reasonable and prudent alternative to the proposed facility has not been demonstrated by a preponderance of the evidence on the record;
>
> C. [B]y a preponderance of the evidence on the record, the proposed facility, or a suitable modification of the facility, will provide benefits to society in a manner compatible with protecting the natural and socioeconomic environments, including human health; and
>
> D. [T]he record does not demonstrate that the design, construction, or operation of the proposed facility, or a suitable modification of the facility, will fail to comply with relevant policies, rules, and regulations of other state and federal agencies and local governments.

5.1 The Probable Result of Denying the DCW CON Application Would Be an Adverse Effect on the Future Adequacy, Reliability, or Efficiency of Energy Supply (Minn. R. 7849.0120(A))

The Project is needed to assist GRE in maintaining RES compliance and adding to its portfolio of power generation resources, to deliver reliable and affordable wholesale electricity to the regional electricity market and its member-owner cooperatives. Denying the application would deny GRE and its member-owners energy from a clean, low-cost renewable resource that it has contracted for under the PPA. This resource would count toward maintaining its RES requirements and meeting its 50% by 2030 goal, as well as assisting in further decarbonizing its overall power supply portfolio.

The Project is the result of DCW and GRE working together to bring additional renewable energy to GRE and its member-owners. In its 2017 Integrated Resource Plan, GRE explained it was exploring the additional of renewable resources through PPAs with wind developers.[6] This exploration led to GRE's execution of the PPA with DCW in which GRE agreed to purchase the full output of the Project for a 30-year term. GRE's commitment to renewable energy and surpassing its RES requirements is supported by its 28 member-owner distribution cooperatives with a combined population of nearly 1.7 million people, and providing power to approximately

[6] GRE 2018-2032 Integrated Resource Plan, Docket No. ET2/RP-17-286 at 8, 37-39 (April 28, 2017), *available at:* https://www.edockets.state.mn.us/EFiling/edockets/searchDocuments.do?method=showPoup&documentId={4566B21C-DC09-4EFA-A66A-757736EDAD8A}&documentTitle=20174-131376-02

700,000 homes and businesses across Minnesota and Wisconsin.[7] Denial of this application, would reduce the amount of renewable energy made available to both GRE and Minnesotans desiring more renewable energy.

The Project's ability to reliably and efficiently deliver wind energy also advances the goal of adding zero-carbon generation resources to Minnesota's energy mix in keeping with the state's long-term plans to reduce greenhouse gas emissions, as discussed in Section 4.1.

Accordingly, the Project will improve the adequacy, reliability, and efficiency of renewable wind energy supply to GRE; assist GRE in meeting its RES requirements as well as its voluntary renewable goal; and advance Minnesota's long-term plans to reduce greenhouse gas emissions statewide. Without the Project, both GRE and electric customers in Minnesota would need to identify alternative renewable resources to meet these needs.

5.2 A More Reasonable and Prudent Alternative to the Project Has Not Been Demonstrated (Minn. R. 7849.0120(B))

Minn. R. 7849.0120(B) requires a CON applicant to examine possible project alternatives so that the Commission can determine whether a more reasonable and prudent alternative exists. Applying the factors set forth in Minn. R. 7849.0120(B), the Project has many advantages when compared to other renewable alternatives.

5.2.1 Size, Type, and Timing

The Project is intended to help satisfy the RES needs of GRE and the state's carbon reduction goals, which can only be satisfied by eligible energy technologies that will reduce carbon emissions. In recognition of this limitation, the Commission granted DCW an exemption from Minn. R. 7849.0250(B) with respect to evaluating fossil fuel alternatives because such alternatives do not meet the Project's objective of providing energy to GRE that will satisfy the RES and other clean energy standards. Of the remaining eligible technologies, wind energy is the most proven and low-cost resource at the size contemplated for the Project (approximately 259 MW), and a resource that can be in commercial operation by the fourth quarter of 2023. Therefore, the type of resource, a wind generation facility, is appropriate to help meet GRE's RES requirements and the transition of the production of energy to zero-based emissions. Similarly, the size and timing of the development of the Project is congruent with GRE's stated needs over the planning period in its last resource plan and advances the clean energy goals of Minnesota.

5.2.2 Cost Analysis

The Project will provide renewable electricity to GRE at a cost that is likely lower than other renewable technologies. The PPA associated with DCW is the result of an arms-length negotiation

[7] GRE 2017 Annual Report at 1, available at: https://greatriverenergy.com/wp-content/uploads/2019/04/GRE2018_AR_FINAL_5_Menu.pdf

between GRE and DCW, and, thus, the price and other terms were attractive to GRE given its needs. Also, the Project will likely generate electricity at a lower cost per kilowatt hour than would other possible renewable energy options, such as solar and biomass. Therefore, the Project will provide competitively priced wind energy at a lower-cost than other renewable energy resource alternatives.

5.2.3 Potential Natural and Socioeconomic Impacts

The renewable characteristics of the Project will provide significant natural and societal benefits. As a zero-emission energy resource, the Project has significant positive attributes on the natural environment when compared to fossil generating plants. For example, the Project will not discharge emissions that can affect the environment, such as particulate matter, mercury, or carbon dioxide. During operations, the Project will also not need valuable water resources to generate electricity and will not discharge pollutants into any water body. The land area impacted by the Project is also significantly less than other renewable technologies such as solar. While the Project site encompasses approximately 28,348 acres, active agricultural land will only be reduced from crop production on a total of approximately 60.5 acres. Also, landowners may continue to plant crops near, and graze livestock up to, the turbine pads. In addition, as a renewable natural resource, wind power does not require the extraction, processing, or combustion of fuel as does a fossil fuel plant or biomass facility. DCW has sought input from the Minnesota Department of Natural Resources (MNDNR), the Minnesota State Historic Preservation Office (SHPO) and the U.S. Fish and Wildlife Service (USFWS) to assist with the design of the Project in order to minimize any potential impact on cultural resources, birds, bats, and wildlife habitat.

From a socioeconomic impact, the Project will provide benefits to participating landowners in the form of a supplementary source of income for easements to site wind turbines and obtain wind rights. Changes in agricultural equipment maneuvering routes around turbine structures will be required, but this maneuvering should only have a nominal effect on overall production.

During construction of the Project and associated facilities, approximately 440 temporary construction personnel will be required. Over the duration of construction (approximately 5-7 months), these personnel will reside in or around Rock County. DCW has committed to using reasonable efforts to employ at least 60 percent local labor during construction and to use union workers for skilled roles such as engineering and electrical construction. During the operations phase of the Project, which is expected to be 30 years, approximately five to eight permanent O&M staff will support Project operations locally. Wages and salaries paid to contractors and workers will contribute to the total personal income of the region. At least part of the wages paid to temporary and permanent Project workers will be circulated and recirculated within the counties and the state. Expenditures made by the Applicant for equipment, fuel, operating supplies, and other products and services will also benefit businesses in the counties and the state.

Moreover, the communities near the Project are also expected to receive positive economic benefits as construction will necessitate the need for numerous temporary and full-time positions that

include good-paying jobs which help develop a skilled clean-energy workforce. Also, as mentioned, the county's tax base will increase as a result of the Project approximately $870,000 and $1,180,000 annually in Dodge, Steele, and Mower Counties.

5.2.4 Reliability

The projected annual net capacity factor for the Project is expected to be approximately 38.9 percent to 46.5 percent is expected annually. The projected average annual output for the Project is approximately 885,900 to 1,059,100 megawatt-hours (MWh).

5.3 The Project Will Provide Benefits to Society in a Manner Compatible with Protecting the Natural and Socioeconomic Environments (Minn. R. 7849.0120(C))

Minn. R. 7849.0120(C) requires a CON applicant to address whether the proposed project will benefit society in a manner that is compatible with protecting the natural and socioeconomic environments, including human health. The following application of the factors set forth in Minn. R. 7849.0120(C) shows the energy produced by the Project will provide significant societal benefits.

5.3.1 Overall State Energy Needs

As explained in **Section 5.1** above, the Project addresses two state energy needs: (1) the RES requirement and (2) the reduction in statewide carbon emissions. Thus, the Project is compatible with Minnesota's energy needs.

5.3.2 Potential Environmental and Socioeconomic Impacts Compared to No-Build Alternative

As explained in **Section 5.2.3**, the Project provides significant socioeconomic benefits while minimizing the impact on the natural environment. A no-build alternative would not provide these same socioeconomic benefits to the local community, and, also, would not provide the benefit of increasing the amount of renewable energy generation in the state. Therefore, the Project has significant socioeconomic and other benefits and minimal impact on the environment in comparison to a no-build alternative.

5.3.3 Inducing Future Development

The Project is not expected to directly induce development in Dodge, Steele, and Mower Counties. As described in **Section 5.2.3**, the Project will, however, provide significant benefits to the local economy and local landowners, which, in turn, may induce future development in the Counties.

5.3.4 Socially Beneficial Uses of Output

The Project will produce affordable, clean renewable energy that will help GRE to meet its RES requirements and the energy demands of GRE and will further the state's goals of reducing carbon emissions. The Project will produce enough energy to meet the energy needs for approximately 70,000 average Minnesota households annually. In addition, as described above, the local economy will benefit from the landowner lease payments for turbines, production taxes, income from the additional jobs created, and local spending.

5.4 The Project Complies with Relevant Policies, Rules, and Regulations of Other State and Federal Agencies and Local Governments (Minn. R. 7849.0120(D))

5.4.1 The Project Is Consistent with Minnesota Energy Policy

As explained, the Project is consistent with Minnesota's energy policies for the production of electricity, including the RES, preference for renewable energy sources, and goals to reduce carbon emissions. With respect to the reduction of carbon emissions, the state's goal is to reduce statewide greenhouse gas emissions across all sectors producing those emissions to a level at least 30% below 2005 levels by 2025 and to a level at least 80% below 2005 levels by 2050. Adding the Project is consistent with meeting these goals.

Minnesota remains committed to achieving its current renewable energy goals and expanding those goals for the future. In March 2019, Governor Tim Walz and Lieutenant Governor Peggy Flanagan announced their One Minnesota Path to Clean Energy – a set of policy proposals intended to lead Minnesota to 100 percent clean energy in the state's electricity sector by 2050.[8] Notably, the carbon emissions attributable to the electricity generation sector is down nearly 30 percent according to the most recent publicly available data on the website of the Minnesota Pollution Control Agency.[9] The Project will assist in continuing to decrease the carbon intensity and emissions of the state's power supply resources.

Further support for the conclusion that the Project is consistent with state energy policy can be found in the favorable tax treatment for wind energy facilities. The state legislature has exempted all real and personal property of a wind energy conversion system from property taxes. A wind energy conversion system, as well as the materials used to manufacture, install, construct, repair, or replace the wind system are also exempt from state sales tax.

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[8] *Walz, Flanagan propose plan to achieve 100 percent clean energy in Minnesota by 2050*, Newsroom, Office of Governor Tim Walz & Lt. Governor Peggy Flanagan (March 4, 2019), *available at*: https://mn.gov/governor/news/?id=1055-374280.

[9] *Greenhouse Gas Emissions Data*, Minnesota Pollution Control Agency, *available at:* https://www.pca.state.mn.us/air/greenhouse-gas-emissions-data

5.4.2 The Project Is Consistent with Applicable Minnesota Statutory Provisions

Minnesota law provides a preference for renewable resources. Minn. Stat. § 216B.243, subd. 3a provides a preference for renewable resources in CON proceedings. Additionally, Minn. Stat. § 216B.2422, subd. 4 requires a finding that a renewable energy resource is not in the public interest before approving a new or refurbished nonrenewable energy facility. The Project is consistent with Minnesota's preference for renewable energy and satisfies these statutory criteria by furthering available resources to meet this renewable energy preference.

5.4.2.1 Distributed Generation

Pursuant to Minnesota Statutes § 216B.2426, the Commission is required to "ensure opportunities for the installation of distributed generation" are considered in CON proceedings. Distributed generation projects are less than 10 MW in size, and, therefore, do not offer the same economies of scale and efficiencies as a utility-scale facility like the Project. Thus, the Project is more appropriately sized to achieve the state's renewable energy policies efficiently and in a cost effective manner.

5.4.2.2 Innovative Energy Preference

Minnesota also requires the Commission to consider an innovative energy project before authorizing construction or expansion of a fossil-fueled generation facility. Minn. Stat. § 216B.1694, subd. 2(a)(5). Because the Project is not a fossil-fuel facility, this requirement is not applicable.

5.4.2.3 Environmental Cost Planning

Minn. Stat. § 216B.243, subd. 3(12) requires the Commission to evaluate the extent to which an applicant has considered the risk of environmental costs and regulation. This statute, however, does not apply to renewable generation facilities such as the Project.[10]

5.4.2.4 Transmission Planning Compliance

Minn. Stat. § 216B.243, subd. 3(10) requires consideration of whether the entity seeking a CON is in compliance with applicable provisions of Minn. Stat. §§ 216B.1691 and 216B.2425, subd. 7. These statutes involve compliance with the state's renewable energy objectives and reporting requirements for owners of existing transmission and distribution. Neither statute is applicable to DCW. While the Project supports the state's renewable energy objective by providing renewable energy to a retail provider in the state, DCW, as an IPP, is not itself subject to these requirements since it does not own existing transmission and distribution infrastructure.

[10] *Elm Creek*, Docket No. IP6631/CN-07-789, Commission Order Granting Certificate of Need at 12 (Jan. 15, 2008).

5.4.3 The Project Is Consistent with Federal Energy Policy

The Project is consistent with federal energy policy in that it provides a domestically produced form of carbon-free energy. In a July 2018 report, the Congressional Research Service recognized the decades-old overarching federal policy of reducing dependence on foreign sources of energy and embracing domestic sources of renewable forms of energy, stating as follows:[11]

> Recognition of the implications of dependence on foreign sources of energy, coupled with concerns over the volatility of prices driven by fluctuations in supply spurred by world events, prompted federal efforts to increase U.S. energy independence and reduce domestic consumption. A major result has been the establishment of a number of programs focused on energy efficiency and conservation of domestic resources and on research programs that target the development of renewable sources of energy. Many of these programs have roots going back almost 40 years and have been redesigned many times over that period.

Since 2005, Congress has enacted several major energy laws: (1) the Energy Policy Act of 2005; (2) the Energy Independence and Security Act of 2007; (3) the Energy Improvement and Extension Act, enacted as Division B of the Emergency Economic Stabilization Act; and (4) the American Recovery and Reinvestment Act. Each of those laws established, expanded, or modified energy efficiency and renewable energy research, development, demonstration, and deployment programs.[12] The Project advances these longstanding federal policy initiatives.

5.4.4 The Project Complies with Federal, State, and Local Environmental Regulation

The Project will meet or exceed the requirements of all applicable federal, state, and local environmental laws and regulations. **Table 2** lists the approvals the Project may need from applicable governmental entities. DCW is committed to obtaining all necessary environmental and other approvals required under federal, state, and local requirements. **Table 2. List of Approvals and Consultations**

Table 2: Other Potential Permits, Reviews, and Consultations

Regulatory Authority	Permit/Approval
Federal	
Federal Energy Regulatory Commission	Exempt Wholesale Generator Self Certification Authorization to sell wholesale power at market-based rates

[11] *Renewable Energy and Energy Efficiency Incentives: A Summary of Federal Programs*, Congressional Research Service (July 11, 2018), *available at: https://fas.org/sgp/crs/misc/R40913.pdf*.
[12] *See id.*

Regulatory Authority	Permit/Approval
Federal Aviation Administration (FAA)	Form 7460-1 Notice of Proposed Construction or Alteration (Determination of No Hazard) Form 7460-2 Notice of Actual Construction or Alteration
Federal Communications Commission (FCC)	Non-federally licensed microwave study National Telecommunications and Information Administration Communication Study NEPA Compliance Checklist for ADLS
U.S. Army Corps of Engineers	Clean Water Act Section 404 coordination (General, Individual, or Nationwide permit if required)
USFWS	Informal consultation under Section 7 of the Endangered Species Act
Environmental Protection Agency (region 5) in coordination with the Minnesota Pollution Control Agency	Spill Prevention Control and Countermeasure Plan
State	
Minnesota Public Utilities Commission	Site Permit for large wind energy conversion system Route permit for high voltage transmission line Certificate of Need
Minnesota Department of Labor and Industry	Electrical plan review, permits, and inspections
SHPO	Informal SHPO consultation for cultural and historical resources review including statewide database and National Register of Historic Places review
Minnesota Pollution Control Agency	National Pollutant Discharge Elimination System/State Disposal System Permit —General Storm Water Permit for Construction Activity License for a Very Small Quantity Generator of Hazardous Waste SPCC Plan Aboveground Storage Tank Notification Form Clean Water Act Section 401 Water Quality Certification

Regulatory Authority	Permit/Approval
Minnesota Department of Health	Environmental bore hole approval for subsurface geotechnical studies Plumbing plan review if required for operation and maintenance building Water Well Permit if required for O&M building
MNDNR	Informal coordination for endangered species statutes Coordination on and/or approval of a Wildlife Conservation Strategy/Avian and Bat Protection Plan General Permit for Water Appropriations, Dewatering Wetlands/waters coordination for Public Waters Work Permit and/or License to Cross Public Lands and Waters
Minnesota Department of Transportation (MnDOT)	Oversize/Overweight Permit for State Highways Access driveway permits for MnDOT roads Tall Towers Permit Utility Access Permit
Local	
Dodge and Steele Counties	Roadway Access Permit Drainage Permit Working in right-of-way Permit Overweight/Over-Dimension Permit Utility Permit Dodge County coordination regarding infrastructure impacts to floodplains
Soil and Water Conservation Districts of Dodge and Steele Counties	Wetland Conservation Act approvals
Townships	• Right-of-way (ROW) permits, crossing permits, road access permits, and driveway permits for access roads and electrical collection system, as needed
Other	
Midcontinent Independent System Operator (MISO)	Turbine Change Study Generator Interconnection Agreement

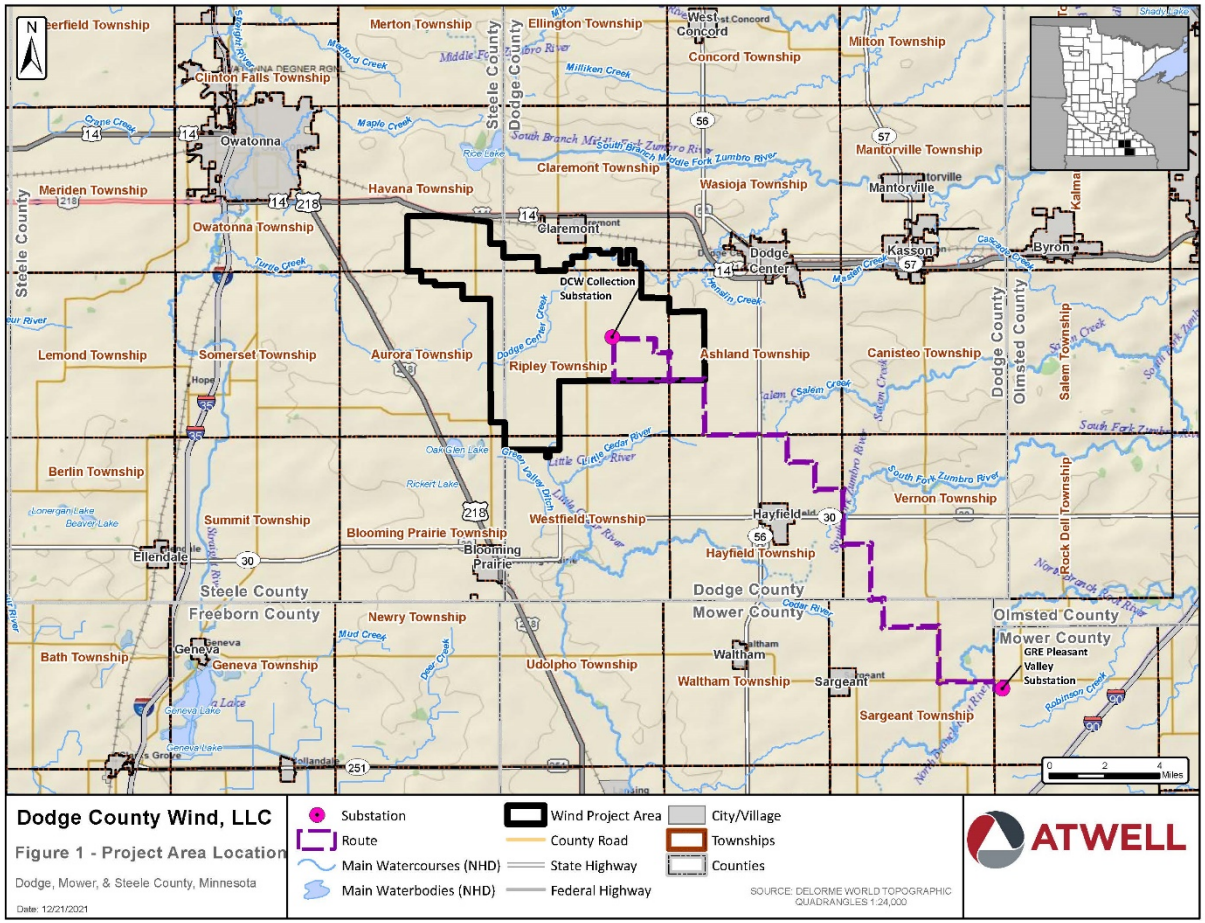
6.0 DESCRIPTION OF LEGF AND ALTERNATIVES (MINN. R. 7849.0250)

6.1 Proposed Project (Minn. R. 7849.0250(A))

The Project will consist of an array of no more than 79 wind turbines. The turbines will be located western Dodge County and eastern Steele County in southeastern Minnesota, immediately southwest of Dodge Center and north of Blooming Prairie, Minnesota. The total capacity of 259 MW will be generated using a combination of the following GE models: eight GE 3.4 MW wind turbines with 140-meter (459.3-foot) RD and 81-meter (265.7-foot) hub height, 60 GE 3.4 MW wind turbines with 140-meter (459.3-foot) RD and 98-meter (321.5-foot) hub height, and 11 GE 2.52 MW wind turbines with 116.5-meter (382.2-foot) RD and 90-meter (295.3-foot) hub height. Each of the Project's turbines will have a step-up transformer pad-mounted outside at the base of unit. Energy from the turbines will be routed through underground electrical collection systems that will deliver power to the Project's collector substation. This power will be stepped up at the Project's collector substation from the collection line voltage of 34.5 kV to the interconnection voltage of 161 kV. In all, the Project facilities include turbines, collection lines, a collector substation, an O&M facility, a construction laydown yard, crane paths, gravel access roads, a meteorological MET tower, and a generation tie line connecting to an existing substation. The 161 kV transmission line and associated facilities will deliver energy from the DCW wind Project to the electric grid. The proposed transmission line will be approximately 26.8 miles long, which will route from the proposed DCW collector substation to be located in Dodge County, Minnesota, to the existing GRE Pleasant Valley Substation located in Mower County, Minnesota. One relatively short alternate route segment, Alternate Segment White, is also proposed for consideration as part of the Project. Approximately 92 percent (24.7 miles) of the transmission lines proposed route would be located within an existing ROW. The majority (83 percent, 22.2 miles) of the Proposed Route would be located within existing road ROW, and another 9 percent (2.4 miles) of the Proposed Route would be co-located with the existing GRE Pleasant Valley to Austin Northeast 161 kV transmission line ROW. Only 8 percent (2.1 miles) of the Proposed Route is planned in areas not within an existing ROW.

A map showing the Project is provided below in **Figure 1** and a map in **Appendix C**.

Figure 1. Project Layout



6.1.1 Nominal Generating Capacity and Effect of Economies of Scale (Minn. R. 7849.0250(A)(1))

The total nominal generating capacity of the Project is up to 259 MW. The Project size produces economies of scale gains in procurement, construction, O&M, and interconnection costs compared to a smaller project. For example, mobilization costs for delivery of turbines and construction of the Project are lower on a per-turbine basis than they would be for a smaller wind project with fewer turbines. The result of gains in the economics of scale is a lower cost of production for electricity.

6.1.2 Annual Capacity Factor (Minn. R. 7849.0250(A)(2))

A net capacity factor of approximately 38.9 percent to 46.5 percent is expected annually. The projected average annual output for the Project is approximately 885,900 to 1,059,100 MWh.

6.1.3 Fuel (Minn. R. 7849.0250(A)(3))

The fuel for the Project is wind.

6.1.4 Anticipated Heat Rate (Minn. R. 7849.0250(A)(4))

Heat rates are specific to fossil generation, and, therefore, are not applicable to a wind generation facility.

6.1.5 Facility Location (Minn. R. 7849.0250(A)(5))

The Project's turbines will be located in western Dodge County and eastern Steele County in southeastern Minnesota, immediately southwest of Dodge Center and north of Blooming Prairie, Minnesota. The estimated size of the Project Site is approximately 28,348 acres (44.3 square miles) of mostly agricultural land, whereas the generation tie line will originate at the proposed DCW collection substation located southwest of the city of Dodge Center and terminate at the existing GRE Pleasant Valley substation. A map showing the Project is provided in **Figure 1.**

6.2 Availability of Alternatives (Minn. R. 7849.0250(B))

Developing and operating generating sources that are cost-effective and use proven technology is particularly important to an IPP like DCW. DCW does not have access to ratepayer funds that could provide a resource for retirement of capital investments. In addition, as a seller of electricity within the terms of an agreed-upon PPA price, DCW must keep its prices – and, thus, its costs – low and competitive.

Commercial feasibility and reliability with respect to the generation output needed are important considerations in selling the power generated. Wind is a proven and reliable resource. Further, the site chosen for the Project is appropriate given the ability to achieve the approximately 38.9

percent to 46.5 percent capacity factor, while minimizing the impact to the environment and human settlement.

6.2.1 Purchased Power (Minn. R. 7849.0250(B)(1))

DCW is an IPP, and, therefore, does not purchase power. Instead, DCW will sell power to the GRE pursuant to a PPA. As such, there is no available alternative data.

6.2.2 Upgrades to Existing Resources (Minn. R. 7849.0250(B)(2))

DCW has no existing facilities in Minnesota. Therefore, there is no facility for DCW to improve. Further, because GRE needs additional renewable energy, there is no potential upgrade to an existing GRE facility suitable to produce approximately 259 MW of wind energy.

6.2.3 New Transmission, Generation, and Alternatives (Minn. R. 7849.0250(B)(3)(4)(5))

According to GRE, there are no transmission, new generation of a different type or a reasonable combination of alternatives that would provide approximately 259 MW of wind energy, as only a wind generating plant can produce the approximately 259 MW of renewable energy contracted for in the PPA.

6.2.4 New Generating Facilities (Minn. R. 7849.0250(B)(4))

6.2.4.1 Solar Power

Solar is not an alternative to the Project, in this region. The cost and reliability of wind power continues to be more favorable than for solar power despite recent substantial reductions in cost for solar. Wind continues to be more cost-effective than solar-powered electricity and remains the lowest-cost new source of renewable energy. For example, the minimum regional variation levelized total system cost for wind power in the EIA's Annual Energy Outlook 2021 was $26.33/MWh compared with $27.28/MWh for solar photovoltaic.[13] Also, from a land-use perspective, a MW of solar requires that more land be temporarily used for the life of the project to achieve the same number of MW. Further, as explained, crop production with the Project will not be significantly impacted, whereas for a solar facility the acres used would be taken out of use for the life of the solar plant. Thus, the Project, as a wind generating facility, has benefits over a solar facility.

[13] U.S. Energy Information Administration, Levelized Cost and Levelized Avoided Cost of New Generation Resources in the Annual Energy Outlook 2021, *available at:* https://www.eia.gov/outlooks/aeo/pdf/electricity_generation.pdf.

6.2.4.2 Hydropower

There has been very little increase in the use of hydropower in Minnesota since 2005. The use of hydropower increased from 774,729 MWh in 2005 to 849,054 MWh in 2015, an increase of less than 10% over that 10-year period.[14] In that same time period, electricity generated from wind power increased more than 517%.[15] According to the 2016 Quad Report, the reason for the minimal investment in hydroelectric power is likely due to the "[c]osts of maintaining and operating dams compared to other sources of energy. . . as well as increased concern about the potential negative effect dams can have on Minnesota's river ecosystems." Finally, hydropower facilities of the same size as the Project do not qualify under the RES, and, thus, do not meet the objective of the Project. Therefore, hydropower is not an alternative to the Project.

6.2.4.3 Biomass

Minnesota communities do have accessible and low-value biomass feedstocks. However, the cost of these feedstocks vary widely, and the unsubsidized levelized cost of energy from biomass tends to be much greater than that of wind. Further, the environmental impacts of a biomass facility may be greater than the Project, due to both the facility itself and the machinery and equipment needed to gather and transport the biomass fuel. For these reasons, a biomass plant is not an alternative to the Project.

6.2.4.4 Emerging Technologies

Emerging renewable power technologies continue to be developed. These technologies are not sufficiently mature to provide the output needed or to be cost-effective and reliable.

Pumped Storage

The proposed site in Dodge and Steele Counties is not suited to pumped storage, because of the need to store large amounts of water in an elevated reservoir. In addition, there is currently no net generation from pumped storage in Minnesota. Therefore, this technology is not an alternative to the Project.

Compressed Air

Highly specialized geological sites are needed to make use of compressed air technology. Such sites do exist, but are not located in the vicinity of the Project Site. Also, this technology is not yet commercially-proven; accordingly, it is not an alternative to the Project.

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[14] Minnesota Department of Commerce, Energy Policy and Conservation Quadrennial Report 2016 at 28 (the 2016 Quad Report) available at: http://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&ved=0ahUKEwivscvd09jbAhWOrVkKHRYyDv8QFggnMAA&url=http%3A%2F%2Fmn.gov%2Fcommerce-stat%2Fpdfs%2Fquad-report2016.pdf&usg=AOvVaw1esivJ8In3md_S5ubtiO_P

[15] *Id.*

Superconducting Magnets

This technology, which makes use of coils that can store electric energy, is not yet commercially proven. Accordingly, it is not an alternative to the Project.

Hydrogen and Fuel Cells

While much research is being done regarding hydrogen and fuel cells, the technology is not yet available on a commercial scale. It is possible, however, that as research and commercial applications advance in years to come, this technology may be used to enhance other renewable technologies, such as the Project.

Table 3 provides comparative costs for the abovementioned technologies and compares them to the costs of wind generation.

Table 3. Renewable Energy Technology Costs[16]

Technology	Size (MW)	Total Overnight Cost (2020$/kW)	Variable O&M (2020$/MWh)	Variable O&M (2020$/kWh)	Fixed O&M (2019$/kW/yr)
Fuel Cells	10	6,277	0.59	0.00059	30.94
Biomass	50	4,077	4.85	0.00485	125.36
Conventional Hydropower	100	2,769	1.40	0.00140	42.01
Wind	200	1,846	0.00	-	26.47
Photovoltaic	150	1,248	0.00	-	15.33
Solar Thermal	115	7,116	0.00	-	85.82

6.2.4.5 Non-CON Facilities (Minn. R. 7849.0120(A)(4))

Under Minn. Stat. §§ 216B.2421 and 216B.243, subd. 2, and Minn. R. Ch. 7849, a CON is required for the Project because it is a "large energy facility," *i.e.*, larger than 50 MW. As an IPP, DCW executed a PPA with GRE following an arms-length negotiation, with GRE determining that the Project was well-suited to meeting its renewable energy needs. Smaller facilities that do not require a CON would not be able to economically provide the amount of electricity that GRE is seeking, and, therefore, GRE chose the Project as the best solution for its needs. In addition, DCW has the advantages of economies of scale, which would not be available in a smaller project.

[16] The figures in this table are taken from a report of the U.S. Energy Information Administration, *Assumptions to the Annual Energy Outlook 2021: Electricity Market Module* (Feb. 2021), at 6, available at: https://www.eia.gov/outlooks/aeo/assumptions/pdf/electricity.pdf.

6.2.4.6 Reasonable Combinations of Alternatives (Minn. R. 7849.0120(B)(5))

There is no combination of the aforementioned renewable alternatives that would be appropriate to consider as a substitute for the Project, because, as compared to the proposed Project, those alternatives would not produce electric output more cost-effectively or reliably than the Project.

6.2.4.7 No Facility Alternative (Minn. R. 7849.0340)

Minn. R. 7849.0340 requires an applicant to submit data for the alternative of "no facility," including a discussion of the impact of this alternative on the applicant's generation and transmission facilities, system, and operations. This rule also requires an analysis of "equipment and measures that may be used to reduce the environmental impact of the alternative of no facility." Minn. R. 7849.0340(C). DCW does not have a "system," nor does it have other generation and transmission facilities in Minnesota, and, therefore, the Commission provided a partial exemption of this requirement, conditioned upon DCW providing equivalent data from GRE regarding a no build alternative. On this point, GRE represents that the "no-facility" alternative would have a detrimental impact to GRE in that the purpose of the Project is to help it meet its RES requirements and its 50% by 2030 renewable energy goals and provide carbon-free energy to its customers and the state. Therefore, consideration of the no facility alternative is not appropriate or warranted given the needs of GRE and the state.

6.2.4.8 Facility Information for Alternatives Involving Construction of a Large High-Voltage Transmission Line (Minn. R. 7849.0330)

Minn. R. 7849.0330 requires the applicant to provide certain data for each alternative that would involve construction of a large high-voltage transmission line. Transmission facilities are not true alternatives to the Project, since the purpose of the Project is to increase the supply of available renewable wind energy. Access to transmission facilities beyond the point of interconnection will be arranged by the grid operator, MISO, and GRE, as applicable. Thus, the electricity generated by the Project will be transmitted over transmission and distribution facilities owned or operated by others. For these reasons, Minn. R. 7849.0330 is not applicable, and the Commission granted DCW an exemption from this data request.

6.3 Discussion of Proposed Facility and Alternatives (Minn. R. 7849.0250(C))

The Commission granted DCW a partial exemption from Minn. R. 7849.0250(C)(1–6, 8, 9), which would require an analysis of various details pertaining to both the proposed facility and each of the alternatives discussed in response to Minn. R. 7849.0250(B). Consistent with the Commission granting DCW a partial exemption from the data requirements in Minn. R. 7849.0250(B), which limits the discussion required to only renewable alternatives, the Commission also limited the information required under this data requirement to only those renewable alternatives discussed in response to Minn. R. 7849.0250(B)(4) that could provide electric power at the asserted level of need. As explained above, there is no such alternative. Therefore, consistent with the partial exemption, only information regarding the Project is applicable.

6.3.1 Wind Facility

6.3.1.1 Capacity Cost (Min. R. 7448.0250 C (1))

Costs for wind energy facilities are typically not expressed in terms of capacity costs. Rather, the Project will deliver energy to GRE on an as-generated basis and will receive payment in the form of a $/kWh payment. DCW's estimated cost for the Project is $300 to $400 million, equating to approximately $1,159/kilowatt (kW) to $1,545/kW.

6.3.1.2 Service Life (Minn. R. 7849.0250(C)(2))

The Project's service life of 30 years has been assumed to estimate annualized capital costs, which is based on the extensive experience of affiliates of DCW with other wind generating plants.

6.3.1.3 Estimated Average Annual Availability (Minn. R. 7849.0250(C)(3))

DCW estimates that the Project will be available approximately 80% - 90% of the year.

6.3.1.4 Fuel Costs (Minn. R. 7849.0250(C)(4))

The Project will be powered by wind, and, therefore, does not have fuel costs like fossil generation. DCW will make nominal purchases of emergency station service when the wind turbines are idle, and this station service may involve a generation mix that includes embedded fuel costs.

6.3.1.5 Variable Operating and Maintenance Costs (Minn. R. 7849.0250(C)(5))

General costs associated with project operation, maintenance, initial spare parts, operating equipment, and operating supplies will be $2.5 million the first year and will average approximately $3,200,000 per year over the following 29 years. An advantage of a wind energy facility the size of the Project is that it typically does not require a complete plant outage for maintenance. Individual turbines can be serviced, while the rest of the facility continues to deliver energy.

The Project's variable O&M costs in current dollars per kilowatt hour are approximately $0.001/kWh - $0.004/kWh in the first year of the Project's operation, and approximately $0.003/kWh - $0.006/kWh thereafter. The total cost of the Project in current dollars per kilowatt hour is approximately $0.004/kWh - $0.006/kWh.

Variable O&M figures for other renewable energy resources are provided in **Table 3**, above.

6.3.1.6 Total Cost (Minn. R. 7849.0250(C)(6))

The capital expenditure for the wind component of the Project is estimated to be between $300 and $400 million. This includes all costs associated with development, design, and construction. General costs associated with project operation, maintenance, initial spare parts, operating equipment, and operating supplies will be $2.5 million the first year and will average approximately $3,200,000 per year over the following 29 years.

6.3.1.7 Effect of Project on Rates System-Wide (Minn. R. 7849.0250(C)(7))

The Commission provided a partial exemption of Minn. R. 7849.0250(C)(7), that would otherwise require DCW to seek information on the effect of the Project on rates system-wide from the purchaser. GRE represents that it is too early to state a positive or negative impact on rates due to the relative value of the project depending on MISO market prices, but GRE expects the addition of a competitively-priced renewable energy resource to be a benefit to its member-owners.

6.3.1.8 Efficiency (Minn. R. 7849.0250(C)(8))

No fuel is burned in the production of energy at the Project, and, therefore, there is no information to provide on this subject.

6.3.1.9 Assumptions (Minn. R. 7849.0250(C)(9))

There are no specific assumptions other than those already identified that impacted the provision of information in response to Minn. R. 7849.0250(C)(1–8).

6.3.1.10 Map of System (Minn. R. 7849.0250(D))

The Commission granted DCW an exemption from Minn. R. 7849.0250(D), which requires an applicant to include a map showing the applicant's system. As an IPP, DCW does not have a "system." In lieu of a system map, DCW is providing with this application maps showing proposed site of the Project in **Appendix C (Wind Maps)**.

6.3.1.11 Promotional Activities (Minn. R. 7849.0240(B))

The Commission granted DCW a partial exemption from Minn. R. 7849.0240, subp. 2 (B), requiring that it request the purchaser, GRE, to provide equivalent data on promotional activities. According to GRE, it has not conducted any promotional activities associated with the Project.

7.0 PEAK DEMAND AND ANNUAL CONSUMPTION FORECAST (MINN. R. 7849.0270)

The Commission granted DCW a partial exemption from Minn. R. 7849.0270, subp. 16, which require the applicant to provide "data concerning peak demand and annual electrical consumption within the applicant's service area and system." DCW does not have a "service area" or "system" and, as such, the requested data is inapplicable to DCW. The Commission, however, required DCW to provide a general overview of the purchaser's system and future renewable resource needs.

GRE's most recent IRP was filed with the Minnesota Public Utilities Commission on April 28, 2017. According to that document, GRE indicated its expectation that a compounded annual

growth rate of 1.3% in energy, and a growth rate of 1.0% in demand over the 2018–2032 planning period.[17]

GRE met the 25% by 2025 RES obligation 8 years early and has set a voluntary goal of 50% renewable end use energy production for our all-requirement member-owners by 2030. In addition, GRE will realize a 90% reduction in its carbon emissions relative to 2005 by January 1, 2023, as Coal Creek Station exits its portfolio.

[17] 7 GRE 2018-2032 Integrated Resource Plan, Docket No. ET2/RP-17-286 at 1 (April 28, 2017), available at: https://www.edockets.state.mn.us/EFiling/edockets/searchDocuments.do?method=showPoup&documentId={4566B21C-DC09-4EFA-A66A-757736EDAD8A}&documentTitle=20174-131376-02.

8.0 SYSTEM CAPACITY (MINN. R. 7849.0280)

Minn. R. 7849.0280 requires a CON applicant to provide information on the ability of its existing system to meet the forecasted demand. As an IPP, DCW does not have a "system" as defined by Minn. R. 7849.0280. Accordingly, the Commission granted DCW an exemption from this requirement, with the understanding that DCW would provide a general overview of the purchaser's system and future renewable resource needs.

GRE's generation resources include owned power plants and purchased power from several wind farms and other generating facilities, resulting in more than 3,300 MW of generation capability. The GRE resource portfolio is a diverse mix of coal, hydroelectric, natural gas, fuel oil, biogas, wind, and solar sources.[18] Additionally, the sale of Coal Creek Station will effectively eliminate coal from GRE's resource mix, decarbonizing its power supply portfolio and reducing its carbon regulatory risk to member-owners over time.

[18] GRE 2018–2032 Integrated Resource Plan at 5

9.0 CONSERVATION PROGRAMS (MINN. R. 7849.0290)

DCW is not a utility, and does not have a system or retail customers, nor does DCW maintain a conservation program. The Commission thus granted DCW an exemption from Minn. R. 7849.0290, which requires an applicant to describe its energy and conservation plans, including load management, and the effect of conservation in reducing the applicant's need for new generation and transmission facilities.

10.0 CONSEQUENCES OF DELAY (MINN. R. 7849.0300)

The Commission granted a partial exemption of this requirement with the understanding that DCW would provide equivalent data from the purchaser, GRE. According to GRE, delay of the Project would detrimentally impact GRE's ability to secure cost-effective wind for its member-owners and achieve its voluntary goal of 50 percent renewable energy by 2030 and would likely result in the cancellation of the PPA. Delay of the Project could also nullify the environmental, policy, and socioeconomic benefits of the Project set forth herein, including the creation of jobs and the advancement of the greenhouse gas emissions reduction goals.

11.0 ENVIRONMENTAL INFORMATION FOR PROPOSED PROJECT AND ALTERNATIVES (MINN. R. 7849.0310)

A Site Permit and Route Permit application will be submitted by DCW in addition to this application. The following is a summary the environmental information that will be set forth in detail in the Site Permit and Route Permit application. To the extent necessary, DWC incorporates by reference the voluminous information in the Site Permit and Route Permit Applications by reference.

11.1 Wind Facility

11.1.1 Impacts to Visual Resources

The aesthetic character of the Project Site consists of an agricultural landscape, which is broken up by residences, buildings, shelter belts, and small wooded lots. Viewsheds in the area are generally long and open. Viewsheds are more limited in areas where vegetation, topography, or existing structures limit the larger view. Three cemeteries are found within the Project Site: the Aurora Lutheran Cemetery, the Saint John's Lutheran Cemetery, and the Thompson Cemetery.

Three commercial wind farms (Oak Glen Wind, G. McNeilus, and Pleasant Valley) are located within 10 miles of the Project Site and contain turbines of various heights and RDs which are visible from locations on the proposed DCW wind Project, as described below:

- The Oak Glen Wind farm is located approximately 2.5 miles southwest of the Project Site and contains 24 turbines that generate 1.8 MW each.
- The G. McNeilus WECS is located approximately two miles east of the Project Site and contains 41 turbines that generate 0.9 MW, 0.95 MW, 1.5 MW, or 1.65 MW, individually.
- The Pleasant Valley WECS is located approximately 7.4 miles southeast of the Project Site and contains 100 turbines that generate 2.0 MW each.

MET associated with these wind facilities may also be visible on the landscape. Generally, the Pleasant Valley, Oak Glen, and McNeilus WECSs contain similar or slightly smaller sized turbine models to those proposed in the Project, with total heights ranging from approximately 345 feet (105 meters) to approximately 475 feet (145 meters).

No existing transmission lines are present within the Project Site. Approximately 138 miles of existing transmission lines are located within 10 miles of the Project Site, ranging from 4 kV to 161 kV in size. These existing transmission lines represent existing visual impacts to the Project Site and its vicinity. As indicated, DCW will propose to construct a 161 kV transmission line to connect the proposed wind facility to the transmission grid. A Route Permit Application for the Project transmission line will be submitted in tandem with this Site Permit Application.

The FCC Antenna Structure Registration database identifies no antenna structures within the Project Site. Four antenna structures are located within 2 miles of the Project Site, resulting in existing visual impacts within the vicinity of the Project Site. An additional 30 existing antenna structures are located within 10 miles of the Project Site.

Table 4. Rotor Diameter and Number of Turbines

Turbine Model	Total Height (meters/feet)	Hub Height (meters/feet)	Rotor Diameter (meters/feet)	Ground Clearance (meters/feet)	Number of Turbines
GE 3.4 MW	168.0/551.0	98.0/321.5	140.0/459.3	28.0/91.9	60
GE 3.4 MW	151.0/495.0	81.0/265.7	140.0/459.3	11.0/36	8
GE 2.52 MW	148.3/486.5	90.0/295.3	116.5/382	32.0/105	11

The Project will utilize a full coverage Aircraft Detection Lighting System (ADLS). The ADLS will be positioned to provide full 360-degree surveillance of the airspace around the wind project in order to provide advance detection of approaching aircraft and automatic activation of the wind project obstruction lighting at a sufficient range for operational safety in compliance with FAA regulations. The system will turn off the obstruction lighting when aircraft have cleared the control zone around the wind project or at altitudes above the wind project regulatory minimums. DCW will request FAA approval of a lighting plan that is compliant with the FAA's requirements.

The proposed Project will be visible to permanent observers (residents) and temporary observers (motorists, tourists, or recreationalists passing by or using the area intermittently). Visual impacts may also be noticeable to users of public lands and public snowmobile trails within and in the vicinity of the Project Area.

Wind turbines will alter the visual surroundings of the landscape within and near the Project Area. Wind turbines are not currently present within the Project Area; however, wind turbines occur within the regional vicinity of the Project Area. Turbines will likely be viewed in one of three perspectives:

- As a visual disruption;
- As generally compatible with the rural agricultural heritage of the area, which includes windmills, silos, and grain elevators; or
- As adding a positive aesthetic quality to the landscape.

The topography in the vicinity of the Project is generally flat and the vegetation is low, and the Project will be visible to residents of the area and to people traveling north and south along Minnesota 56, and east and west along U.S. Highway 14, and northwest and southeast along U.S. Highway 218. The installation of wind turbines will not significantly alter the character of the

regional landscape given the presence of existing wind farms in the vicinity; however, the degree of visual impact will vary based on the type of observer and individual preference.

The Project includes a new collector substation with a graveled footprint anticipated to be no more than two acres in size. The collector substation will include 161 kV busses, up to two generator step-up transformers, circuit breakers, reactive equipment, steel structures, a control building, metering units, and air-break disconnect switches. A transmission line will exit the collector substation. The project collector substation's general vicinity currently includes farmsteads, overhead transmission lines, distribution lines, a railroad, and wind turbines. In addition, highways and county roads are an existing part of the human-made alterations to the environment.

The O&M facility will provide office space for the crews, as well as a shop/storage area for spare parts and vehicles. It will also house the central monitoring equipment for the Project where the turbines are monitored and controlled. The footprint of the facility is anticipated to be approximately 2 acres and will include an access road, parking lot, and O&M building. The O&M facility will be a one-story structure with an attached garage for vehicle storage and maintenance. Similar to the substation, residents located near the O&M facility are expected to have a higher sensitivity to the potential aesthetics impacts than temporary observers.

Temporary visual impacts will occur during construction, including the presence of equipment staging and laydown areas, crane(s) and crane paths, and the installation of underground collection lines. Visual impacts as well as temporary alteration of land use within the construction corridor would be for the duration of construction.

11.1.2 Shadow Flicker Impacts

With respect to wind turbines, shadow flicker can be defined as an intermittent change in the intensity of light in a given area resulting from the operation of a wind turbine due to its interaction with the sun. While indoors, an observer experiences repeated changes in the brightness of the room as shadows cast from the wind turbine blades briefly pass by windows as the blades rotate. In order for this to occur, the wind turbine must be operating, the sun must be shining, and the window must be within the shadow region of the wind turbine, otherwise there is no shadow flicker. A stationary wind turbine only generates a stationary shadow similar to any other structure.

A Project-specific shadow flicker analysis was conducted using the software package, WindPRO. The WindPRO modeling was further refined by incorporating sunshine probabilities and wind turbine operational estimates by wind direction over the course of a year. The values produced by this further refinement are known as the "expected" shadow flicker. The results of the shadow flicker analysis will be included as an appendix to DCW's Site Permit application and will include details regarding the methodology and results of the assessment including calculated annual hours of shadow flicker at identified receptors based upon a worst-case scenario and an expected case scenario.

The predicted expected annual shadow flicker duration ranged from 0 hours, 0 minutes per year to 59 hours, 42 minutes per year. The maximum expected flicker was at a participating receptor (#16). The maximum expected flicker at a non-participating receptor (#217) was 40 hours, 30 minutes. The majority of the receptors (387) were predicted to experience no annual shadow flicker. In all, 93 locations were predicted to experience some shadow flicker but less than 10 hours per year. The modeling results showed that 52 locations would be expected to have 10 to 30 hours of shadow flicker per year, and 22 receptors are expected to have over 30 hours of flicker per year, three of which are non-participating receptors. The modeling results are conservative in that modeling receptors were treated as "greenhouses" and the surrounding area was assumed to be without vegetation or structures (bare earth).

The Project was designed to minimize shadow flicker exposure of the residences in the area. DCW will use site-specific mitigation measures to address shadow flicker impact, as appropriate, including the following:

- Meet with the homeowner to determine the specifics of their complaint;
- Investigate the cause of the complaint; and
- Provide the homeowner with mitigation alternatives including shades, blinds, awnings or plantings.

11.1.3 Impacts to Land Use

The Project occurs primarily within county-zoned agricultural districts. DCW is not likely to impact future zoning and expansion of incorporated areas in the vicinity of the Project, and development of the Project will allow the continued agricultural use of the Project. Development of the Project will allow continued agricultural use within the Project Area, while helping to strengthen the local economy through annual payments to landowners with Project infrastructure on their property, potential use of local contractors and suppliers, potential temporary jobs for local workers, and tax benefits to local governments.

Temporary and permanent impacts to current land use are anticipated to occur from the construction of the Project. Only the land for the turbines and associated pads, the Project's collector substation, the MET tower, the O&M facility, certain electrical equipment, and the access roads will be permanently taken out of crop production. After construction is completed, remaining land surrounding the turbines and access roads may still be farmed. The permanent loss of approximately 60.5 acres of agricultural land will not result in the loss of agricultural-related jobs or net loss of income. Revenue lost from the removal of land from agricultural production will be offset by lease payments to individual landowners according to their respective contracts with DCW.

DCW has and will continue to plan the Project to avoid direct permanent and temporary impacts to natural areas, including wetlands, native plant community types, and Minnesota Biological Survey Sites of Biodiversity Significance within the Site, including native prairies, to the extent

feasible. Additionally, DCW will avoid impacts to conservation land such as Wildlife Management Areas (WMAs). Based on landcover mapping, almost all of the turbines are planned entirely in lands currently under crop cultivation. Additionally, access roads will utilize existing roads or paths and will avoid grasslands, shrubland, and wooded areas when feasible.

11.1.4 Impacts to Wildlife

The *U.S. Fish and Wildlife Service Land-Based Wind Energy Guidelines* were issued, on March 23, 2012, to provide a structured and scientific approach to assessing and addressing wildlife concerns during all stages of land-based wind energy development. The guidelines use a tiered approach that provides for an iterative decision-making process for collecting information, with each tier increasing in the detail of research and information. The tiered approach allows a developer to evaluate the potential risk associated with developing a project at a given location and provides the opportunity for evaluation and decision-making at each step of a project to enable the developer to abandon or proceed with development or to collect additional information.

Field and desktop studies indicate that impacts to wildlife and wildlife habitat are expected to be minimal because grasslands, wooded areas, shrublands, and other areas identified as important to wildlife are limited within the Project Area and will largely be avoided through project design. Minor impacts to grasslands, shrublands, and wetlands may occur.

Bird and bat mortalities that may occur at the Project during operations are unlikely to affect populations of most species, including species of conservation concern. However, impacts to birds and bats as a result of the Project are not expected to differ markedly from those reported by other previous studies in agricultural settings within Minnesota.

11.2 Transmission Facility (associated facility)

The Proposed Route for the transmission generation tie line is in southeastern Minnesota within Dodge and Mower counties, approximately 13 miles west of Rochester and 45 miles south of Minneapolis. Approximately 92 percent (24.7 miles) of the Proposed Route would be located within an existing ROW. The general topography of the Route is described as undulating, rolling relief with approximate elevations between 1,276 and 1,368 feet above mean sea level. The Proposed Route follows relatively flat terrain, threading between the upper watershed of several creeks and rivers.

The Route is dominated by cropland and rural farmsteads surrounding small towns. Due to siting within existing road ROW, mostly adjacent to agricultural fields, the dominant land cover types within the Project ROW are developed open space. This includes managed roadside vegetation (approximately 45 percent) and cultivated crops (approximately 43 percent) (MRLC 2019).

According to the MNDNR Ecological Classification System, the Route is located within the Eastern Broadleaf Forest Province, a transition zone between the western prairies and eastern mixed conifer/deciduous forest (MNDNR 2021a). This Province is further divided into Sections and Subsections. The entire Route lies within the Minnesota and Northeast Iowa Morainal Section

(222M), which is characterized by deciduous forest, woodland, and prairie in a hummocky morainal landscape, and the Oak Savanna Subsection (222Me). This area was historically covered by bur oak savanna, patches of tallgrass prairie, and maple-basswood forest on gently rolling hills (MNDNR 2021a) however, the majority of this area is now farmed.

Predominant features along the Route include farms and rural residences; croplands; several snowmobile trails; the Root River, Sargeant Creek, and Zumbro River; five MNDNR public watercourse crossings; existing powerlines; and one Site of Biodiversity Significance (ranked as "below"). No WMAs, native plant communities, or other protected areas are located within the Route Width. Aerial interpretation of natural vegetation areas intersecting the Project ROW indicates that few deciduous woodland areas are present; those present consist of isolated wooded areas associated with homesteads or small riparian corridors. The Proposed Alignment parallels the edge of several of these wooded areas, as the route is primarily confined to existing ROW.

11.2.1 Land Cover

The impacts are most likely to affect common roadside vegetation, including planted reclamation species, weeds, and roadside ditches, as well cultivated crops where the Route does not follow existing roadways. Construction and maintenance of the Proposed Alignment will not impact recognized areas of high-quality biodiversity significance or specifically designated native plant communities.

Permanent impacts to roadside vegetation within the Project ROW would be limited to locations of poles and other support structures. After construction, maintenance of these road and transmission line ROW areas is expected to continue generally unchanged. Temporary impacts to roadside vegetation would be revegetated in compliance with the Stormwater Pollution Prevention Plan and in coordination with the respective ROW authorities and landowners, as appropriate.

Permanent impacts to agricultural crops within the Project ROW would be limited primarily to the two locations where poles and other support structures are proposed outside of road ROW: within the DCW Wind Project area and where the Project will be co-located with the GRE Pleasant Valley to Austin Northeast transmission line. Where the proposed Project would be co-located with the existing GRE Pleasant Valley to Austin Northeast transmission line, existing GRE poles would be removed and replaced with combined Project and GRE circuits on monopole structures. As such, within the GRE ROW, slight changes to pole locations are anticipated; however, appreciable permanent impacts are not anticipated.

11.2.2 Public Health and Safety

Construction activities and the temporary increase in associated workers are not expected to adversely affect public health or emergency services due to the limited number of construction workers and short duration of activities. Project construction will require different worker skill sets for various aspects of Project construction and installation. The specialized nature of the workers'

skill sets, and the short duration of construction activities, would preclude any long-term worker relocation to the area. Construction activities may require additional resources for traffic control and law enforcement.

11.2.3 Radio, Television, Cellular Device, and GPS Interference

Noise created by electric transmission line coronas may impact local reception of radio and television signals. Interference with AM radio frequency is the most common type of interference from corona noise. This is most commonly observed immediately below a transmission line. Impacts to FM signals are more infrequent due to their operation outside of corona noise frequencies. Television signals may be impacted when the receiver is behind a transmission structure (in a shadow) and is opposite the transmitter. Based on the Project design, DCW does not anticipate radio or television interference that would exceed limits recommended by industry guidelines.

Interference associated with cellular devices is not likely as cellular transitions or packet switching occurs when a cellular link becomes unavailable. Additionally, interference with GPS systems is not anticipated from the construction or operation of the Project, as GPS signals generally are not interrupted by corona produced noise (Silva and Olsen 2002).

11.2.4 Aesthetics

The proposed Project would alter the visual appearance within the vicinity of the Proposed Alignment by adding additional vertical and horizontal human-made structures to the existing landscape. The height, type, and configuration of the proposed transmission structures will depend on the terrain, span length, and respective county design preferences.

Proposed heights of project infrastructure are not anticipated to exceed 160 feet. Proposed span lengths for the transmission line support structures are not anticipated to exceed 900 feet, with a typical average span of approximately 500 to 800 feet. The proposed Project will not create a new feature type within the landscape as existing overhead transmission and distribution lines are present within the landscape surrounding the Route. The Proposed Alignment currently parallels existing overhead electric transmission line ROWs for approximately two miles. The Applicant has sited the Project largely within existing road and transmission line ROW, which reduces the amount of new visual impacts.

11.2.5 Cultural Values

Cultural values are not expected to be impacted by the Project. The Project will not alter the rural character of the area, nor will it substantially influence the continuation of farming for local residents. The proposed Project appears to comply with the overall goals of Dodge and Mower counties to conserve farmland and natural resources and to support economic and sustainable development. The Project appears compatible with the rural, agricultural character of the counties;

appears compatible with the economic and development goals set forth in each of the respective county comprehensive plans; and promotes development to occur where infrastructure already exists.

Farming activities may be temporarily impacted during Project construction. Given the location of the Project primarily within existing road and transmission line ROW, with only a small amount of land to be taken out of agricultural production, landowners may continue to plant crops and graze livestock near the transmission line structures.

11.2.6 Recreation

As the Project is planned primarily within existing road and transmission line ROW, recreational impacts will largely be avoided. The Route could impact snowmobiling along the portions of the snowmobile trails that parallel or cross the Project. During construction, the Project may require the temporary closing or relocating of part of the snowmobile trails to ensure the safety of construction personnel and recreationalists. Recreationalists using the snowmobile trails may be impacted by the change in aesthetics when they are in proximity to the transmission line. Construction and maintenance activities may also cause wildlife to relocate from the Project ROW, which could impact localized hunting activities.

11.2.7 Transportation – Roads

Because the Project will be largely located within existing road ROW there is the potential for the safety of the traveling public to be impacted during construction and operations. Project construction would likely result in temporary impacts to roadways such as road and lane closures and an increase in traffic congestion. Temporary road and lane closures would be necessary to safely and efficiently install the transmission line along, and across, roadways. Road and lane closures may cause localized, temporary delays. Once the transmission line has been installed near a road or lane closure, the road and/or lanes would be re-opened, and traffic flow would resume as normal. Most of the roads within the Route have minimal daily traffic, and road and/or lane closures should not have significant impacts on local traffic. There may be some temporary traffic impacts at the crossings of State Highway 30 and State Highway 56. Construction and operation of the Project is not anticipated to have permanent impacts on roadways or traffic and is not anticipated to impact the safety of the traveling public given mitigation measures discussed below.

11.2.8 Archaeological and Historic Resources

Two known architectural inventory resources are located within the Route(bridge No. 2493 and MnDOT Trunk Highway 56). The Proposed Alignment would not cross over bridge No. 2493 but would instead parallel the bridge approximately 40 feet to its north. However, the Proposed Alignment would cross over Trunk Highway 56.

No previously recorded archaeological resources are located within the Route. Therefore, impacts to previously recorded archaeological resources would not occur as a result of construction and operation of the Proposed Route.

No tribal resources were located within the Route during field surveys and coordination. Therefore, impacts to tribal resources would not occur as a result of construction and operation of the Proposed Alignment. DCW recognizes the importance of cultural resources to local and scientific communities. To that end, DCW implements an avoidance strategy for cultural resources. However, the proposed construction activities for the Project may have the potential to encounter unidentified archaeological sites.

11.2.9 Surface and Ground Water

Potential temporary impacts to surface water and floodplain resources could occur during project construction when activities could result in increased turbidity of surface waters from soil erosion; fuel or chemical leaks from equipment near surface water areas; and physical disruption to vegetation and wildlife habitat bordering streams. As the Project is currently designed, the highest potential for these temporary impacts would occur at 22 watercourse crossings. No standing waterbodies such as ponds or lakes would be crossed by Project infrastructure. No impacts are expected to designated wildlife lakes and special waters.

Runoff from construction area surface disturbance could enter surface waters during installation/removal of temporary and permanent culverts, respectively. This could result in localized increases in turbidity and sediment load in adjacent streams. Similar impacts could occur when collection lines are installed beneath waterway surfaces via open cut methodology or crossing of stream areas by crane path walks. Direct negative impacts to water quality could result in indirect detrimental impacts to aquatic wildlife and habitat.

Potential temporary impacts to surface water quality could occur from inadvertent spills or release of construction equipment fuel or construction activity chemicals. Direct negative impacts to water quality from fuel or chemical contamination could result in indirect detrimental impacts to aquatic wildlife and habitat.

Temporary and permanent impacts could occur should construction activities require clearing of woody vegetation. Similarly, such impacts to herbaceous vegetation could occur during construction area clearing and equipment operation. Direct negative impacts to vegetation resources could cause indirect negative impacts to wildlife habitat and individual organisms.

Permanent impacts to streams and ditches will be largely avoided by completely spanning the bed and banks of these features. In the case of the five PWI watercourse, the spans would also include the required 50-foot protective buffers.

Waters designated by the state of Minnesota as Public Waters (Minnesota Statues (Minn. Stat.) § 103G.005, subdivision (subd.) 15) are regulated by the MNDNR. These waters comprise PWI as set forth in Minn. Stat., Section 103G.005, subd. 15 (MNDNR 2021d). The MNDNR requires a license to cross PWI waters with an electric transmission line (Minn. Stat. § 84.415). While such Project activity is not anticipated, the MNDNR would require a Public Waters Work Permit should the course, current, or cross-section of any water listed in the PWI be altered.

Impacts to groundwater resources and wells are not expected from Project construction due to abidance of setback requirements. As a best practice, transmission line structures will be set back from known well locations following state and county standards.

Minimal water-related needs for construction and operations are expected to be fulfilled with either well or rural water service. The Project therefore has no need for groundwater use, nor will it result in intrusion into groundwater systems.

Wells in the Routetypically range from 75 feet to 200 feet deep. This is significantly deeper than the maximum Project structure foundation depth which is not expected to exceed approximately 50 feet. Therefore, as no intersection is anticipated, no impacts from structure foundations to existing water wells is expected.

11.2.10 Wetlands

Negligible impacts to wetlands are expected from Project construction and operations. No forested wetlands occur in the Project ROW. Potential impacts to scrub/shrub wetlands from tree trimming and woody vegetation removal for the maintenance and operation of the transmission line is unlikely, given only 0.1 acres of these wetlands occur within the Project ROW. Temporary impacts to wetlands may occur but will be minimized as described below.

11.2.11 Threatened and Endangered Species

Population impacts to northern long-eared bats are not likely as no known northern long-eared bat roost trees or hibernacula are known to exist within Dodge or Mower counties. Relatively little woodland clearing will be required for construction and maintenance of the Project ROW. As noted above, the riparian area associated with the North Fork Root River is the most significant wooded riparian feature that could provide suitable summer habitat for the northern long-eared bat within the Route. Because the Project ROW follows existing transmission line and road at this crossing, little to no tree removal would be necessary for construction or maintenance of the Proposed Alignment at this location.

One bald eagle nest has been identified approximately 5,289 feet from the edge of the Project ROW east of the intersection of 690th Street and Trunk Highway 56. The NBEMG specifies a 660-foot construction activities avoidance buffer around any known bald eagle nest during the breeding

season (USFWS 2007). No impacts to the nest tree are anticipated given the distance from the Project ROW, which is greater than the recommended 660-foot buffer. Raptor nest surveys did not document any active state-listed raptor nests within one mile of the Project ROW. Avian (including raptor) electrocution risk is not anticipated from the proposed transmission line. However, collisions could still occur, depending on location and surrounding habitat features.

Regarding MNDNR-listed species with Natural Heritage Information System (NHIS) records near the Proposed Alignment, these data indicate that populations of Sullivant's milkweed (threatened) could be present in roadside ditches or other grasslands within one mile of the Route. Recent windshield surveys could not confirm these observations.

Since state-endangered loggerhead shrikes nest in low height profile vegetation communities, limited suitable habitat may be present along the Project ROW. Strictly aquatic species, such as the suckermouth minnow, redfin shiner, and mussel assemblages, are not likely to be directly impacted by the construction and operation of the Proposed Alignment as all support structures will be located outside of the ordinary high water mark and the associated 50-foot setbacks from Minnesota public watercourses. This includes the North Branch Root River where these species have been documented. No native plant communities delineated by MNDNR occur within the Project ROW. Thus, no impacts are anticipated.

11.3 Collector Substation (associated facility)

The Applicant proposes to construct the DCW collector substation on up to two acres of land in Dodge County approximately six miles southwest of the city of Dodge Center, Minnesota. At this time, DCW has an option agreement with the landowner to purchase up to 10 acres of land where the substation will be sited.

The DCW collector substation is located in western Dodge County, Section 15 of Ripley Township, on a privately owned parcel of land that is currently used for crop production. The DCW collector substation would be located within the Eastern Iowa and Minnesota Drift Plains Level IV ecoregion of the Western Corn Belt Plains Level III ecoregion. The Western Corn Belt Plains land form in this area consists of level to rolling glaciated till plains with hilly loess-covered plains and has an annual average precipitation of 24 to 36 inches (Auch 2016).

The general topography of the area is described as undulating, rolling relief. The proposed DCW collector substation location has relatively flat terrain with approximate elevations between 1,286 and 1,294 feet above mean sea level. No modifications to existing topographic features are expected to occur as a result of construction and operation of the proposed substation. Therefore, no impacts to topography are anticipated, and no mitigation measures are proposed.

The proposed DCW collector substation location is currently in agricultural production. The area soils are classified as prime farmland, within the Level Plains agroecoregion (University of Minnesota and MDA 1998). The Level Plains agroecoregion soils are fine-textured and poorly drained and support row crop production on relatively flat topography. The dominant soil association within the substation property is Readlyn-Racine-Maxfield-Kasson. These soils are considered to be silty loams.

The DCW collector substation is located in the Zumbro River Hydrologic Unit Code subbasin (07040004). The nearest named perennial stream is Dodge Center Creek, which lies approximately 2.3 miles to the west. Several unnamed streams are immediately to the north and southwest of the DCW collector substation (USGS 2020).

According to the MNDNR NHIS geographical data, no species listed as threatened or endangered under the Endangered Species Act (ESA) or by MNDNR are recorded within one mile of the DCW collector substation location (MNDNR 2021g). Based on the USFWS National Wetlands Inventory (NWI), no wetlands occur on the DCW collector substation site. The nearest wetland, identified as a palustrine emergent area, is located approximately 200 feet to the south.

12.0 FACILITY INFORMATION FOR PROPOSED PROJECT AND ALTERNATIVES INVOLVING CONSTRUCTION OF AN LEGF (MINN. R. 7849.0320)

12.1 Land Requirements (Minn. R. 7849.0320(A))

The Project is located on land that is zoned for agricultural use. The Project will require approximately 0.77 acre per turbine for the turbine pad, transformer, access road, and associated infrastructure. The land requirements for the Project are consistent with the requirements for wind projects of a similar size. No relocation of people or businesses will be necessary for the Project.

12.1.1 Land Requirements for Water Storage

The Project will not require any land for water storage.

12.1.2 Land Requirements for Cooling System

The Project will not require any land for a cooling system.

12.1.3 Land Requirements for Solid Waste Storage

The Project will require minimal space for maintenance of the facilities, and will be used for the storage of used oil and other lubricants, as well as for spare parts and tools.

12.2 Traffic (Minn. R. 7849.0320(B))

The Project is expected to have a minimal effect on existing services and infrastructure and will be constructed and operated in accordance with associated federal, state, and local permits and laws. Industry construction and operation standards and prudent utility practices will also be followed.

Temporary impacts are expected to public roads during the construction phase of development as materials, personnel, and equipment will be brought in via existing U.S. highways, county roads, and township roads. U.S. Highways 218 and 14 are the main access routes into the Project Area and would likely be used as routes to bring materials and equipment to the project site; however, the exact routes will be determined closer to construction and in coordination with local jurisdictions as appropriate. The maximum amount of construction traffic is expected to be approximately 500 trips per day during peak construction. Local roads can accommodate this traffic as the functional capacity of a two-lane paved rural highway is in excess of 5,000 vehicles per day. As Dodge County CSAH 3 has the highest AADT within the Project Area at 355 vehicles per day, an increase in 500 vehicles per day during the peak of the construction phase would equate to 855 vehicles per day or 4,145 vehicles per day under the capacity of a two-lane paved rural highway. As such, temporary impacts to public roads are anticipated to be minimal, though some minor, short-term traffic delays within and near the project site may occur during turbine and equipment delivery and construction activities.

Public road and intersection improvements, as well as access road approaches and turning radii, are required to link the project access roads to the existing road network and for transportation and turbine component delivery during the construction phase of the Project.

12.3 Information Pertaining to Fossil-Fueled Activities (Minn. R. 7849.0320(C–D))

12.3.1 Fuel

The Project is not a fossil-fueled facility.

12.3.2 Emissions

The Project is not a fossil-fueled facility and will not release any emissions from the power generation process.

12.4 Water Usage for Alternate Cooling Systems (Minn. R. 7849.0320(E))

Wind power plants do not utilize cooling systems. Water requirements therefore are limited to potable water needs for Project personnel. The water requirements of the O&M building will be met through the local rural water service or the installation of a well in accordance with applicable regulations.

12.5 Water Discharges (Minn. R. 7849.0320(F))

No wastewater discharges will occur as a result of the construction or operation of the Project except for domestic-type sewage discharges of Project personnel. Temporary sanitary facilities will be provided during construction, and the O&M building may require a septic system, which will be installed in accordance with applicable regulations.

12.6 Radioactive Releases (Minn. R. 7849.0320(G))

The Project will not produce any radioactive releases.

12.7 Solid Waste (Minn. R. 7849.0320(H))

Any wastes generated during any phase of the Project will be handled and disposed of in accordance with Minnesota Rule Chapter 7045, local rules and regulations. A site-specific Spill Prevention, Control, and Countermeasure Plan (SPCC) will be created for both the construction and operational phases of the Project. The SPCC will detail the appropriate storage, cleanup, and disposal of hazardous wastes associated with the Project. Any monitoring, transportation, or handling of materials will be conducted by trained and qualified personnel utilizing established procedures and proper equipment.

To avoid potential impacts to water and soil resources, hazardous materials stored outdoors will be stored within secondary containment. Secondary containment will prevent impacts and will contain leaks in the event that they occur.

12.8 Noise (Minn. R. 7849.0320(I))

The Project within is required to comply with the sound level requirements in Minn. R. Ch. 7030 for Noise Pollution Control. NAC 1 (primarily residential) receptors. Since wind turbines can operate under conditions resulting in maximum sound power, during both the day and at night, the Project would need to comply during the period with more stringent limits, nighttime. Furthermore, because wind turbine sound is generally steady, the L_{50} (median) sound level is more likely to be affected by wind turbine sound than the L_{10}, which is controlled more by unsteady sound. The L_{50} limit is also more restrictive than the L_{10} limit. Therefore, NAC 1 receptors were evaluated against the L_{50} sound level limit of 50 dBA in DCW's analysis.[19] This is a total sound level limit which includes sound from the Project and existing sound sources.

[19] A full Project sound level assessment report is provided with DCW's Site Permit Application in Docket No. IP6981/WS-20-866.

The highest predicted worst-case sound level from the project wind turbines is 47 dBA. Modeled sound level isolines are presented on Map 10 - L50 Sound Modeling Results. The highest predicted worst-case Project Only L50 sound level of 47 dBA is at a participating receptor #209. Under conditions resulting in non-wind-turbine ambient sound levels of 47 dBA or less, total sound levels (Project + non-wind-turbine ambient) will meet the limit of 50 dBA. Nighttime measurements showed non-wind-turbine ambient L50 broadband sound levels range from 21 to 56 dBA when ground-level wind speeds were at or below 11 mph and winds at hub height corresponded to conditions in the modeling. These measured sound levels exceeded 50 dBA at five of the six locations during the measurement program. Non-wind-turbine ambient sound levels can fluctuate due to sound sources such as ground-level winds, vehicular traffic, birds, and vegetation rustle, all of which have the potential to cause non-wind-turbine ambient sound levels to be equal to or exceed the L50 nighttime limit of 50 dBA. In these instances, the increase to the non-wind-turbine ambient sound level due to the Project will be zero to two decibels since the highest modeled Project-Only sound level is 47 dBA. Under conditions where two sound levels have the same or very similar characteristics a two-dBA change is imperceptible to the average person.

12.9 Work Force for Construction and Operation (Minn. R. 7849.0320(J))

Approximately 400 jobs over the five to seven-month construction period and 5-8 full-time O&M jobs are expected as part of the Project. DCW has committed to using reasonable efforts to employ at least 60 percent local labor during construction and to use union workers for skilled roles such as engineering and electrical construction. The approximate distribution of the construction workforce for the Project is indicated in **Table 5**, below.

Table 5. Approximate Construction Workforce and Distribution

Labor Type	Average Headcount	Peak Headcount	Approximate Source Location	
			Non-Local (%)	Local (%)
Laborers	100-130	130	70	30
Equipment Operators	60-75	75	20	80
Crane Operators	15–25	25	20	80
Electricians	80-100	100	25	75
Management	50-60	60	40	60

12.10 Number and Size of Transmission Facilities (Minn. R. 7849.0320(K))

A proposed aboveground 161 kV transmission will interconnect the Project to the GRE Pleasant Valley substation in Mower County. The interconnection to the Pleasant Valley Substation will

be considered under the MISO Surplus Interconnection process, which, in turn, provides DCW with greater certainty that there is sufficient capacity to cost-effectively interconnect. The interconnection to the transmission grid for the Project is currently under evaluation by MISO.

APPENDIX A – EXEMPTION REQUEST

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

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**

PETITION FOR EXEMPTION FROM CERTAIN CERTIFICATE OF NEED APPLICATION REQUIREMENTS OF DODGE COUNTY WIND, LLC

Pursuant to Minn. R. 7849.0200, Subp. 6, Dodge County Wind, LLC ("DCW"), respectfully submits this Petition for Exemption from Certain Certificate of Need Application Requirements ("Petition") to the Minnesota Public Utilities Commission ("Commission"). DCW respectfully requests that the Commission grant exemptions from certain Certificate of Need ("CON") information requirements not applicable to independent power producers ("IPPs") developing large wind energy conversion systems ("LWECS").

I. PETITIONER

DCW is an IPP and an indirect wholly-owned subsidiary of NextEra Energy Resources, LLC ("NEER"). NEER is a national renewable energy marketing and development company that owns and operates over 23,900 megawatts ("MW") of electric generating capacity in 38 states and Canada. An affiliate of NEER owns the Buffalo Ridge Wind project.[1]

[1] On January 5, 2021, the Commission issued an order granting a Certificate of Need and issuing a Site Permit for the Buffalo Ridge wind facility.

DCW proposes to develop, own, and operate an up to 280 MW LWECS to be located in Dodge County, with an approximate 26-mile 161 kilovolt ("kV") generation tie line, (collectively the "Project") that connects the LWECS to the transmission grid at the Great River Energy ("GRE") Pleasant Valley Substation. The generation tie line will be located in Dodge County and Mower County. The output of the DCW LWECS is fully contracted to GRE under a 30-year Power Purchase Agreement ("PPA").

The Project falls within the definition of a "large energy facility," as defined by Minn. Stat. § 216B.2421, Subd. 2. Therefore, pursuant to Minn. Stat. § 216B.243, a CON is required for the wind facility and the generation-tie line. On December 14, 2020, pursuant to Minn. R. 7829.2550, DCW filed its 90-day Notice Plan for its CON. Consistent with a past Commission decision involving a wind facility and its generation-tie line that require a CON,[2] DCW plans to submit a consolidated application for a CON.[3]

II. REQUEST FOR EXEMPTIONS

The Commission's CON rules set forth in Chapter 7849 of the Minnesota Rules apply to a broad range of projects. These rules in some respects focus on a determination of need for utility-built generation, rather than IPP generation. With this recognition, the rules authorize an applicant,

[2] *In the Matter of the Application of Noble Flat Hill Windpark I, LLC for a Certificate of Need for a Large Energy Facility*, a 201 MW Large Wind Energy Conversion System and Associated Facilities in Clay County, Docket No. IP-6687/CN-08-951, Order Granting Exemption, Approving Notice Plan As Modified And Granting Variance at 1 (October 16, 2008).

[3] Minn. Stat. § 216B.2421, Subd. 2(1) defines a "large energy facility" for which a CON is required as "any electric power generating plant or combination of plants at a single site with a combined capacity of 50,000 kilowatts or more ***and transmission lines directly associated with the plant that are necessary to interconnect the plant to the transmission system***." Emphasis added. DCW will also require a Site Permit and a Route Permit. DCW plans for file the applications for the Site Permit, Route Permit, and CON on the same day.

such as DCW, to request exemptions from filing requirements that are not applicable to the Project. Specifically, Minn. R. 7849.0200, Subp. 6 provides that:

> Before submitting an application, a person is exempted from any data requirement of this chapter if the person (1) requests an exemption from specified rules, in writing to the commission, and (2) shows that the data requirement is unnecessary to determine the need for the proposed facility or may be satisfied by submitting another document. A request for exemption must be filed at least 45 days before submitting an application. The commission shall respond in writing to a request for exemption within 30 days of receipt and include the reasons for the decision. The commission shall file a statement of exemptions granted and reasons for granting them before beginning the hearing.

Pursuant to this rule, DCW requests exemptions from certain CON filing requirements that are inapplicable to its Project. As discussed below, certain filing requirements are inapplicable to DCW because the requirements: (i) are specific to traditional utilities, rather than to an IPP, such as DCW; (ii) pertain to the consideration of nonrenewable alternatives and the Project is a renewable energy project intended to assist GRE meet its renewable energy needs; and (iii) seek data that does not exist with respect to the Project or data that can be satisfied by submitting documents/information other than those sought. Accordingly, as described more fully in the sections below, DCW requests that it be exempt from the following CON filing requirements:[4] (i) Minn. R. 7849.0240, subp. 2 (B); (ii) Minn. R. 7849.0250 (B) 1-5; (iii) Minn. R. 7849.0250 (C) 1-

[4] The Commission has granted similar exemption requests for other IPP wind facilities. *See e.g.*, *In the Matter of the Application of Buffalo Ridge Wind Energy, LLC for a Certificate of Need for the 109.2 MW Large Wind Energy Conversion System in Lincoln County, Minnesota*, IP-7006/CN-19-309 (July 3, 2019) ("Buffalo Ridge Wind Exemption Order") ; *In the Matter of Petition of Dodge County Wind, LLC, for a Certificate of Need for the 200 MW Large Wind Energy Conversion System and an Associated 345 kV Transmission Line in Dodge County*, Minnesota, Docket No. IP-6981/CN-17-306 (July 7, 2017) ("Dodge County Wind Exemption Order"); *In the Matter of the Application of Blazing Star Wind Farm, LLC for a Certificate of Need for the 200 Megawatt Blazing Star Wind Project in Lincoln County, Minnesota*, Docket No. IP-6961/CN-16-215 at 1 (April 28, 2016) ("Blazing Star Exemption Order").

9; (iv) Minn. R. 7849.0250 (D); (v) Minn. R. 7849.0270; (vi) Minn. R. 7849.0280; (vii) Minn. R. 7849.0290; (viii) Minn. R. 7849.0300; (ix) Minn. R. 7849.0330; and (x) Minn. R. 7849.0340.[5]

A. Promotional Activities (Minn. R. 7849.0240, subp. 2 (B))

Under Minn. Rule 7849.0240, subp. 2 (B), an application for a CON is required to include ". . . an explanation of the relationship of the proposed facility to . . . promotional activities that may have given rise to the demand for the facility." DCW, however, does not intend to sell electricity directly to end-use customers, and, therefore, has not engaged in any promotional activity that "may have given rise to the demand" for the Project's electric output. In the past, the Commission has granted an exemption of this rule to a similarly situated IPP, conditioned on the IPP providing equivalent data from the purchaser.[6] Consistent with past Commission decisions, DCW requests an exemption from Minn. R. 7849.0240, Subp. 2(B) with the understanding it will provide in its CON application equivalent information from GRE with respect to promotional activities.

B. Availability of Alternatives (Minn. R. 7849.0250 (B) 1-5).

Minn. Rule 7849.0250 (B) 1 through 5 requires a CON applicant to discuss the availability of alternatives to the facility, including: (i) purchased power; (ii) increased efficiency of existing facilities; (iii) new transmission lines; (iv) new generating facilities of a different size or using a different energy source; and (v) any reasonable combination of the items in (i) through (iv).

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[5] As the Commission previously acknowledged, "Minnesota Rules 7849.0260 requires data be provided regarding applications for an LHVTL. Since DCW is not proposing a LHVTL (the transmission line is considered part of the LEGF), none of the data requirements are applicable and an exemption is not needed." Dodge County Wind Exemption Order at 1 (adopting the recommendations of the Department of Commerce at p. 5).

[6] *See,* Buffalo Ridge Wind Exemption Order at 1; Blazing Star Exemption Order at 1;

With respect to filing requirement 1, DCW has contracted with GRE through a PPA for the full output of the Project, and, therefore, consideration of a purchase power alternative is not applicable. In addition, unlike a traditional public utility, DCW has no existing facilities in Minnesota, and, therefore, the filing of information under filing requirement 2 on improving the efficiency of existing facilities is not applicable. DCW, however, understands that, consistent with past Commission rulings, it will be required to provide equivalent data from GRE with respect to requirement 2.[7]

With regard to requirement 3, the development of new transmission facilities cannot substitute for the delivery of the output of the Project. While Minnesota utilities that develop, own, and operate transmission lines that from a reliability standpoint may in certain cases be substitutes for the need for generation, DCW is not addressing a reliability issue. Therefore, the consideration of transmission lines as an alternative to the DCW under filing requirement 3 is not applicable. DCW, however, understands that, consistent with past Commission rulings, it will be required to provide equivalent data from GRE for requirement 3.

DCW should be granted a partial exemption from filing requirement 4. Specifically, DCW requests that it not be required to address non-renewable alternatives to the Project, because non-renewable alternatives cannot fulfill the proposed Project's purpose of increasing the supply of renewable generation to GRE. The Commission has previously granted this partial exemption to a renewable energy project agreeing that "[n]on-renewable alternatives could not fulfill the proposed Project's purpose of increasing the supply of renewable generation as set out by the

[7] *See,* Buffalo Ridge Wind Exemption Order at 1; Dodge County Wind Exemption Order at 1.

renewable energy Minnesota Renewable Energy Standard statute, Minn. Stat. § 216B.1691."[8] The same is true with respect to the Project. DCW, however, will address renewable alternatives to the DCW Project in its CON application.

Given that filing requirements 1, 2, and 3 are inapplicable to DCW and requirement 4 only partially applicable, DCW requests an exemption from requirement 5 related to any reasonable combination of the items in 1-4, with the understanding that, consistent with past Commission decisions, it will provide equivalent data from GRE with respect to requirement 5.[9]

C. Details Regarding Alternatives (Minn. R. 7849.0250 (C) 1-6, 8 and 9).

Minn. R. 7849.0250 (C) 1-6, 8 and 9 requires a CON applicant to provide a description of alternatives that could provide electric power at the asserted level of need. As explained above, nonrenewable alternatives cannot fulfill the proposed Project's purpose of increasing the supply of renewable generation. Therefore, consistent with the request for a partial exemption of Minn. R. 7849.0250 (B) 4 and Commission precedent,[10] DCW proposes to address Minn. R. 7849.0250 (C) 1-6, 8, and 9 for those renewable alternatives it identifies that could provide electric power at the asserted level of need.

[8] *See,* Buffalo Ridge Wind Exemption Order at 1; Blazing Star Exception Order at 1.

[9] *See,* Buffalo Ridge Wind Exemption Order at 1; Dodge County Wind Exemption Order at 1.

[10] *See,* Buffalo Ridge Wind Exemption Order at 1; Blazing Star Exception Order at 1.

D. Effect on Rates System-Wide (Minn. R. 7849.0250 (C) 7).

Minn. R. 7849.0250 (C) 7 requires a CON applicant to estimate the Project's "effect on rates system-wide and in Minnesota, assuming a test year beginning with the proposed in-service date." As an IPP, DCW does not operate a "system." As such, the required data is neither available to DCW nor necessary to determine need for the Project. Thus, consistent with past Commission rulings,[11] DCW requests an exemption from filing the information sought in Minn. R. 7849.0250 (C) 7. However, in accordance with prior Commission rulings with respect to IPPs who have entered into a PPA, DCW will provide equivalent data from GRE.[12]

E. Map of Applicant's System (Minn. R. 7849.0250 (D)).

Minn. R. 7849.0250 (D) requires a CON applicant to include a map showing the applicant's system. Given that DCW is an IPP and does not have a system or a Commission-approved customer service area, consistent with past Commission decisions on this rule, DCW proposes to file a map showing the site of the DCW Project, including the generation tie line and its proposed interconnection to the transmission grid.[13]

F. Peak Demand and Annual Consumption Forecast (Minn. R. 7849.0270).

Minn. R. 7849.0270 requires an applicant to provide "data concerning peak demand and annual electrical consumption within the applicant's service area and system. . . ." DCW requests an exemption from this requirement for the Project on the grounds that it does not own a system

[11] *Id.*

[12] *See,* Buffalo Ridge Wind Exemption Order at 1; Dodge County Wind Exemption Order at 1.

[13] *See,* Buffalo Ridge Wind Exemption Order at 1.

or maintain a service area within the meaning of the rule. Notwithstanding the exemption, consistent with Commission rulings, DCW will provide a general overview of GRE's system and future renewable resource needs.[14]

G. System Capacity (Minn. R. 7849.0280).

The purpose of Minn. R. 7849.0280 is for the CON applicant to address ". . . the ability of its existing system to meet the demand for electrical energy forecast in response to part 7849.0270 and the extent to which the proposed facility will increase this capability." As explained, DCW does not have a system within the meaning of the rule, and, therefore, the requested information is inapplicable. Thus, DCW requests an exemption from the filing requirements in Minn. R. 7849.0280. Notwithstanding the exemption, similar to Section II F of this filing, DCW will provide a general overview of GRE's system and future renewable resource needs.[15]

H. Conservation Programs (Minn. R. 7849.0290).

In accordance with Minn. R. 7849.0290, a CON applicant is required to provide information related to conservation programs, including information on the programs an applicant has considered, description of the major accomplishments, costs, and a discussion of their expected effects in reducing the need for new generation and transmission facilities. This rule is specifically tailored for utilities and is not applicable to an IPP like DCW. DCW is not a utility, and does not have a system or retail customers, nor does DCW maintain a conservation program. In addition, only an increase in the amount of energy derived from eligible energy technologies will enable

[14] *See,* Blazing Star Exemption Order at 1.

[15] *Id.*

GRE and its members to meet Minnesota's renewable obligations. Consistent with the Commission's decision to grant this exemption to other IPPs, DCW respectfully requests that an exemption from this requirement be granted.[16]

I. Consequences of Delay (Minn. R. 7849.0300).

DCW requests an exemption from the requirement in Minn. R. 7849.0300 that it analyze the consequences of delay since this rule is written for utilities that have a system and can impact other systems. DCW does not have a system as contemplated by this rule. As a result, consistent with Commission rulings, DCW will provide equivalent data from GRE to address this requirement.[17]

J. Transmission Facilities (Minn. R. 7849.0330)

Minn. R. 7849.0330 requires an applicant for a CON to provide certain data for each alternative that would involve construction of large high voltage transmission lines ("LHVTL"). Transmission facilities are not true alternatives to the Project, since the purpose of the Project is to increase the supply of available renewable energy to GRE. DCW plans to interconnect to the GRE Pleasant Valley Substation within the Project area via an approximately 26-mile 161 kV generation tie line. Thus, DCW does not currently plan to install any facilities that would be classified as an LHVTL.[18] Transmission facilities beyond the point of interconnection will be identified in the MISO interconnection process and addressed by the affected transmission owner. Thus, the

[16] *Id.*

[17] *Id.*

[18] Minn. Stat, § 216B.2421, Subd. 2 defines a LHVTL as "any high-voltage transmission line with a capacity of 200 kilovolts or more and greater than 1,500 feet in length." *See* Minn. R. 7849.0010, Subp. 14.

electricity generated by the Project will be transmitted via facilities owned or operated by others under the MISO Tariff. For these reasons, Minn. R. 7849.0330 is not applicable to the Project, and DCW respectfully requests that an exemption from this requirement be granted.

K. The Alternative of No Facility (Minn. R. 7849.0340).

Minn. R. 7849.0340 requires for the ". . . three levels of demand specified in part 7849.0300 . . ." that a CON applicant ". . . provide the following information for the alternative of no facility . . ." including ". . . a description of the expected operation of existing and committed generating and transmission facilities. . . ." As already explained, Minn. R. 7849.0300 is not applicable, because DCW does not have a system that can impact other systems. Also, it has been explained that DCW does not have any existing generating and transmission facilities. Therefore, DCW cannot provide information requested by Minn. R. 7849.0340, and, thus, consistent with Commission precedent,[19] requests that it be exempt from these filing requirements. However, in accordance with prior Commission rulings with respect to an IPP with a PPA, DCW will provide equivalent data from GRE to address this requirement.[20]

III. CONCLUSION

The requested exemptions from certain CON filing requirements are consistent with well-established Commission precedent[21] and, therefore, for the reasons stated above, DCW respectfully requests that the Commission grant its requested exemptions.

[19] Blazing Star Exemption Order at 1.

[20] Dodge County Wind Exemption Order at 1.

[21] *See infra*, footnote 2.

Dated: May 7, 2021

Respectfully submitted,

/s/ Brian M. Meloy

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STATE OF MINNESOTA
BEFORE THE
PUBLIC UTILITIES COMMISSION

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 in Dodge, Mower and Steele Counties, Minnesota	MPUC Docket No. IP-6981/ CN-20-865

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on May 7, 2021 a true and correct copy of **Dodge County Wind, LLC's Petition for Exemption from Certain Certificate of Need Application Requirements** has been served by e-mail and/or U.S. Mail to the following:

Name	Email/Address	Delivery Method
Generic – Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Electronic
Kate Fairman	kate.frantz@state.mn.us	Electronic
Annie Felix Gerth	Annie.felix-gerth@state.mn.us	Electronic
Sharon Ferguson	sharon.ferguson@state.mn.us	Electronic
Kari Howe	Kari.how@state.mn.us	Electronic
Ray Kirsh	Raymond.Kirsch@state.mn.us	Electronic
Karen Kromar	karen.kromar@state.mn.us	Electronic
Susan Medhaug	Susan.medhau@state.mn.us	Electronic
Brian Meloy	brian.meloy@stinson.com	Electronic
Brian Murphy	Brian.J.Murphy@nee.com	Electronic
Generic – Residential Utilities	residential.utilities@ag.state.mn.us	Electronic
Stephan Roos	stephan.roos@state.mn.us	Electronic
Will Seuffert	Will.Seuffert@state.mn.us	Electronic
Cynthia Warzecha	cynthia.warzecha@state.mn.us	Electronic

Dated this 7th day of May, 2021

/s/ Joshua M. Feit
Joshua M. Feit

APPENDIX B – ORDER ON EXEMPTIONS

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

Brian M. Meloy
Stinson LLP
50 South Sixth Street, Suite 2600
Minneapolis, MN 55402

SERVICE DATE: July 13, 2021

DOCKET NO. IP-6981/CN-20-865

In the Matter of the Petition for Exemption from Certain Certificate of Need Application Requirements for the Application of Dodge County Wind, LLC 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, Minnesota

The above entitled matter has been considered by the Commission and the following disposition made:

1. **Determined that the following data requirements are not applicable:**
    a. **7849.0260: Proposed LHVTL and Alternatives Application**
2. **Approved the following exemptions conditioned upon Dodge County providing alternative data:**
    a. **7849.0240, subp. 2 (B): Promotional Activities;**
    b. **7849.0250 (B) 1-5: Description of Certain Alternatives;**
    c. **7849.0250 (C) 7: Effect of Project on Rates System-wide;**
    d. **7849.0250 (D): Map of Applicant's System;**
    e. **7849.0270: Peak Demand and Annual Consumption Forecast;**
    f. **7849.0280: System Capacity;**
    g. **7849.0300: Consequences of Delay—System; and**
    h. **7849.0340: The Alternative of No Facility.**

3. **Approved the following exemptions as proposed:**

    a. **7849.0250 (C) 1 to 6, 8 and 9: Availability of Alternatives to the Facility;**

    b. **7849.0290: Conservation Programs; and**

    c. **7849.0330: Alternatives Involving an LHVTL.**

This decision is issued by the Commission's consent calendar subcommittee, under a delegation of authority granted under Minn. Stat. § 216A.03, subd. 8 (a). Unless a party, a participant, or a Commissioner files an objection to this decision within ten days of receiving it, it will become the Order of the full Commission under Minn. Stat. § 216A.03, subd. 8 (b).

The Commission agrees with and adopts the recommendations of the Department of Commerce, which are attached and hereby incorporated into the Order. This Order shall become effective immediately.

BY ORDER OF THE COMMISSION

Will Seuffert
Executive Secretary

COMMERCE DEPARTMENT

May 27, 2021

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. IP-6981/CN-20-865

Dear Mr. Seuffert:

Attached are the Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

> Petition for Exemption from Certain Certificate of Need Application Requirements for the Application of Dodge County Wind, LLC 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, Minnesota.

The petition was filed on behalf of Dodge County Wind, LLC on May 7, 2021 by:

> Brian M. Meloy
> Stinson LLP
> 50 South Sixth Street, Suite 2600
> Minneapolis, Minnesota, 55402

The Department recommends that the Minnesota Public Utilities Commission (Commission) **approve the data exemption requests with conditions.** The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ MICHAEL N. ZAJICEK
Rates Analyst

MNZ/ar
Attachment

Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce
Division of Energy Resources

Docket No. IP-6981/CN-20-865

I. SUMMARY OF FILING

On May 7, 2021, Dodge County Wind, LLC (Dodge County or the Applicant) filed the Company's *Request for Exemption from Certain Application Content Requirements* (Petition). The Applicant also filed a notice plan petition on May 7, 2021, to which the Minnesota Department of Commerce, Division of Energy Resources (Department) is responding to in separate comments.

On May 20, 2021 the Minnesota Public Utilities Commission (Commission) issued its *Notice of Comment Period on Request for Exemption from Certain Certificate of Need Filing Requirements* (Notice). The Notice asked: "Should the Commission grant the exemptions to the certificate of need application content requirements as requested by Dodge County Wind, LLC?"

A. *PROJECT BACKGROUND*

Dodge County is an independent power producer (IPP) and indirect wholly-owned subsidiary of NextEra Energy Resources, LLC (NEER) that plans to construct a 161-kilovolt (kV) transmission line and associated facilities in Dodge and Mower Counties, Minnesota. According to Dodge County, the project is required to connect a 280-megawatt (MW) wind farm located in Dodge County, Minnesota, to the existing Pleasant Valley Substation, owned by Great River Energy (GRE), in Mower County, Minnesota. The output from Dodge County is fully contracted to GRE under a 30-year Purchase Power Agreement (PPA).

B. *EXEMPTION REQUESTS*

In the Petition, Dodge County requests exemption from providing data relevant to the Minnesota Rules listed below, or the data is otherwise irrelevant to the Petition:

i. 7849.0240, subp. 2 (B);
ii. 7849.0250 (B) 1-5;
iii. 7849.0250 (C) 1 to 6, 8 and 9;
iv. 7849.0250 (C) 7;
v. 7849.0250 (D);
vi. 7849.0260;
vii. 7849.0270;

viii. 7849.0280;
ix. 7849.0290;
x. 7849.0300;
xi. 7849.0330; and
xii. 7849.0340.

Dodge County notes that the Commission has previously granted exemption requests for these items for IPP projects.

Below are the Comments of the Department regarding the Petition.

II. DEPARTMENT ANALYSIS

A. GOVERNING STATUTE

Minnesota Statutes § 216B.243, subd. 2 states that no large energy facility (LEF) shall be constructed without a certificate of need (CN). At 280 MW, the proposed Project qualifies as an LEF. Dodge County's Petition requests exemption from several of the filing requirements related to a future CN application for the proposed Project.

Minnesota Rules, part 7849.0200, subp. 6 states that an exemption is appropriate if the data requirement is not necessary in order to determine the need, or can be obtained via another document:

> Before submitting an application, a person is exempted from any data requirement of parts 7849.0010 to 7849.0400 if the person (1) requests an exemption from specified rules, in writing to the Commission, and (2) shows that the data requirement is unnecessary to determine the need for the proposed facility or may be satisfied by submitting another document. A request for exemption must be filed at least 45 days before submitting an application.

The Department examines each specific exemption request separately. The criterion to be considered is whether Dodge County has shown that "the data requirement is unnecessary to determine the need for the proposed facility or may be satisfied by submitting another document."

B. *EXEMPTION ANALYSIS*

1. 7849.0240, subp. 2 (B): Promotional Activities

This rule requires an applicant to provide an explanation of the relationship of the proposed facility to promotional activities that may have given rise to the demand for the facility. Dodge County states that the Company does not intend to sell electricity directly to end-use customers and "has not

engaged in any promotional activity." The Department notes that the Commission has granted this exemption to IPPs because these companies do not have captive retail customers.

2. 7849.0250 (B) 1-5: Description of Certain Alternatives

This rule requires an applicant to provide a discussion of the availability of alternatives to the facility, including but not limited to:

1) purchased power;
2) increased efficiency of existing facilities, including transmission lines;
3) new transmission lines;
4) new generating facilities of a different size or using a different energy source; and
5) any reasonable combinations of the alternatives listed in sub items (1) to (4).

Dodge County requests an exemption from information requirements 1, 2, 3 and 5 as they are not applicable and a partial exemption of requirement 4 such that Dodge County not address non-renewable alternatives. With respect to 7849.0250 (B) 4 the Department agrees with the Applicant that an exemption to the extent an alternative cannot address the need for renewable power is reasonable.

Regarding Minnesota Rules 7849.0250 (B) 1, Dodge County has a signed PPA for the full output of the Project with GRE and thus purchased power is not an alternative. Thus, an exemption is appropriate.

The requirements of Minnesota Rules 7849.0250 (B) 2, 3 and 5 are not applicable to Dodge County as the Applicant is not a vertically integrated regulated utility and therefore has no existing facilities in Minnesota for which efficiency could be improved in order to mitigate the need for the project, and does not own or plan to own transmission lines other than those needed for the interconnection of the project. Dodge County notes that in the past the Commission has required equivalent data from the purchaser for the output of projects. As such the Applicant requests to provide equivalent data from GRE. Therefore, the Department recommends that the exemption be granted under the condition that Dodge County provide equivalent data from GRE.

3. 7849.0250 (C) 1 to 6, 8 and 9: Availability of Alternatives to the Facility

This rule requires an applicant to provide the following information for the proposed facility and each of the alternatives provided in response to Minnesota Rules 7849.0250 (B):

1) capacity costs in current dollars per kilowatt;
2) service life;
3) estimated average annual availability;
4) fuel costs in current dollars per kilowatt hour;
5) variable operating and maintenance costs in current dollars per kilowatt hour;
6) total cost in current dollars of a kilowatt hour provided by it;
7) estimate of its effect on rates system wide and in Minnesota;

8) efficiency, expressed as the estimated heat rate; and
9) major assumptions made in providing the above information (e.g., escalation rates used, projected capacity factors).

Dodge County requests a partial exemption from this Rule to limit its discussion to only renewable alternatives, similar to their request for exemption from Minnesota Rules 7849.0250 (B). Specifically, since the intent of the project is to provide renewable energy to sell to the market, examination of non-renewable alternatives would be irrelevant.

The Department agrees that the required information—regarding non-renewable alternatives—is not relevant to analysis of alternatives to Dodge County's proposed Project and that limiting the requirement to renewable alternative data will better address the proposed need. Therefore, the Department recommends that the Commission grant the proposed exemption.

4. 7849.0250 (C) 7: Effect of Project on Rates System-wide

This rule requires an applicant to provide an estimate of the project's effect on rates system-wide and in Minnesota, assuming a test year beginning with the proposed in-service date. Dodge County requests an exemption because Dodge County does not operate a system and is not a utility with retail rates. Instead Dodge County propose to provide equivalent data from GRE. The Commission has granted a similar exemption to IPPs because IPPs do not have a system. Therefore, the Department recommends that the Commission grant the proposed exemption with the proposed alternative data.

5. 7849.0250 (D): Map of Applicant's System

This rule requires an applicant to provide a map of the applicant's system. Dodge County requests an exemption because Dodge County does not operate a system and thus the information does not exist. As an alternative, Dodge County proposes to file a map showing the site of Dodge County's project, including the generation-tie line and its proposed interconnection to the transmission grid. The Department agrees that the proposed alternative map would contain more relevant data. Therefore, the Department recommends that the Commission approve the requested exemption with the provision of Dodge County's proposed alternative data.

6. 7849.0260: Proposed LHVTL and Alternatives Application

Minnesota Rules 7849.0010 subpart 13 defines a large electric generating facility (LEGF) as an "electric power generating unit or combination of units as defined by Minnesota Statutes, section 216B.2421, subdivision 2, clause (1)." In turn, Minnesota Statutes 216B.2421 subd. 2 (1) defines a large energy facility as "any electric power generating plant or combination of plants at a single site with a combined capacity of 50,000 kilowatts or more and transmission lines directly associated with the plant that are necessary to interconnect the plant to the transmission system." Therefore, under

Minnesota Rules Dodge County's proposed transmission line is not considered to be a facility separate from the generating unit and does not qualify as a large high voltage transmission line (LHVTL).[1] Minnesota Rules 7849.0260 requires data be provided regarding applications for an LHVTL. Since Dodge County is not proposing a LHVTL (the transmission line is considered part of the LEGF), none of the data requirements are applicable and an exemption is not needed.

7. 7849.0270: Peak Demand and Annual Consumption Forecast

This rule requires an applicant to provide system forecast data. Dodge County requests an exemption because it does not have a service area or a system. Dodge County proposes to provide a general overview of GRE's system and future renewable resource needs. The Department agrees that Dodge County's proposed alternative data is relevant. Therefore, the Department recommends that the Commission approve the requested exemption and require Dodge County to provide data regarding GRE's system and future renewable resource needs.

8. 7849.0280: System Capacity

This rule requires an applicant to provide information regarding the ability of its existing system to meet the demand for electrical energy forecast in response to part 7849.0270. Again, Dodge County does not have a system but proposes to submit alternative data on GRE's system and future renewable resource needs. The Department recommends that the Commission approve the requested exemption and require Dodge County to provide alternative data on GRE's system and future renewable resource needs.

9. 7849.0290: Conservation Programs

This rule requires an applicant to provide information related to conservation programs. Dodge County requests an exemption to this rule because Dodge County is not a regulated utility, has no retail customers, and plans to sell the project's output into the wholesale market. For these reasons and the fact that the project is a renewable energy project, conservation programs could not serve as an alternative to the project.

The Department agrees that conservation cannot meet a need for renewable energy and recommends that the Commission approve the requested exemption.

10. 7849.0300: Consequences of Delay—System

[1] This is consistent with the Commission's October 16, 2008 *Order Granting Exemption, Approving Notice Plan as Modified and Granting Variance* in Docket No. IP6687/CN-08-951 which determined that a notice plan was required for an 11-mile, 230-kV transmission line proposed to interconnect a 201 MW generation project. However, no exemptions regarding Minnesota Rules 7849.0260 were granted and the subsequent CN proceeding did not require information regarding alternatives to the transmission facility.

This rule requires an applicant to provide information regarding anticipated consequences to its system, neighboring systems, and the power pool should the proposed facility be delayed one, two, and three years, or postponed indefinitely. Dodge County requests an exemption because the Company does not have a system, and proposes instead to provide equivalent data from GRE. The Department recommends that the Commission approve the requested exemption and with the requirement that Dodge County provide equivalent data from GRE.

11. 7849.0330: Alternative Involving an LHVTL

This rule requires an applicant to provide data for each alternative that would involve construction of an LHVTL. Regarding this requirement Dodge County states that "transmission facilities are not true alternatives to the Project, since the purpose of the Project is to increase the supply of renewable energy to GRE." The Department agrees with Dodge County's analysis and recommends that the Commission grant the proposed exemption.

12. 7849.0340: The Alternative of No Facility

This rule requires an applicant to provide information regarding the impact of the alternative of no facility on the existing system. Dodge County requests an exemption because it does not have a system, but proposes to provide equivalent data from GRE. The Department recommends that the Commission approve the requested exemption and allow Dodge County to provide equivalent data from GRE to address this requirement.

III. DEPARTMENT RECOMMENDATION

The Department recommends that the Commission determine that the following data requirements are not applicable:

- 7849.0260: *Proposed LHVTL and Alternatives Application*

The Department recommends that the Commission approve the following exemptions conditioned upon Dodge County providing alternative data:

- 7849.0240, subp. 2 (B): Promotional Activities;
- 7849.0250 (B) 1-5: Description of Certain Alternatives;
- 7849.0250 (C) 7: Effect of Project on Rates System-wide;
- 7849.0250 (D): Map of Applicant's System;
- 7849.0270: Peak Demand and Annual Consumption Forecast;
- 7849.0280: System Capacity;
- 7849.0300: Consequences of Delay—System; and
- 7849.0340: The Alternative of No Facility.

The Department recommends that the Commission approve the following exemptions as proposed:

- 7849.0250 (C) 1 to 6, 8 and 9: Availability of Alternatives to the Facility;
- 7849.0290: Conservation Programs; and
- 7849.0330: Alternatives Involving an LHVTL.

/ar

CERTIFICATE OF SERVICE

I, Robin Benson, hereby certify that I have this day, served a true and correct copy of the following document to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States mail at St. Paul, Minnesota.

Minnesota Public Utilities Commission
ORDER

Docket Number: **IP-6981/CN-20-865**

Dated this **13th** day of **July, 2021**

/s/ Robin Benson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-865_CN-20-865
Kate	Fairman	kate.frantz@state.mn.us	Department of Natural Resources	Box 32 500 Lafayette Rd St. Paul, MN 551554032	Electronic Service	No	OFF_SL_20-865_CN-20-865
Annie	Felix Gerth	annie.felix-gerth@state.mn.us		Board of Water & Soil Resources 520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	OFF_SL_20-865_CN-20-865
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_20-865_CN-20-865
Kari	Howe	kari.howe@state.mn.us	DEED	332 Minnesota St, #E200 1ST National Bank Bldg St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-865_CN-20-865
Ray	Kirsch	Raymond.Kirsch@state.mn.us	Department of Commerce	85 7th Place E Ste 500 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-865_CN-20-865
Karen	Kromar	karen.kromar@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	OFF_SL_20-865_CN-20-865
Mark	Lennox	Mark.Lennox@nee.com	Dodge County Wind, LLC	700 Universe Blvd Juno Beach, FL 33408	Electronic Service	No	OFF_SL_20-865_CN-20-865
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-865_CN-20-865
Brian J	Murphy	Brian.J.Murphy@nee.com	Nextera Energy Resources, LLC	700 Universe Blvd LAW-JB Juno Beach, FL 33408	Electronic Service	No	OFF_SL_20-865_CN-20-865

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_20-865_CN-20-865
Stephan	Roos	stephan.roos@state.mn.us	MN Department of Agriculture	625 Robert St N Saint Paul, MN 55155-2538	Electronic Service	No	OFF_SL_20-865_CN-20-865
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-865_CN-20-865
Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources	500 Lafayette Road Box 25 St. Paul, Minnesota 55155-4040	Electronic Service	No	OFF_SL_20-865_CN-20-865