

December 16, 2025

VIA E-FILING

Ms. Sasha Bergman
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, MN 55101-2147

Re: *In the Matter of the Application of Big Bend Wind, LLC for a Large Wind Energy Conversion System Site Permit for the up to 311.1 MW Big Bend Wind Project in Cottonwood and Watonwan Counties, Minnesota*

MPUC Docket No. IP-7013/WS-19-619

Dear Ms. Bergman:

Big Bend Wind, LLC (Big Bend Wind or the Company), respectfully submits these reply comments pursuant to the Minnesota Public Utilities Commission (Commission)'s Notice of Comment Period of Site Permit Amendment issued on November 26, 2025.¹

Big Bend Wind provides this response to written comments submitted by the Commission Energy Infrastructure Permitting (EIP) staff and Mr. Brad Hutchison during the initial comment period ending on December 10, 2025, regarding Big Bend Wind's Site Permit Amendment Request (Request).

Big Bend Wind's Request includes removing the Nordex N-163 turbine, uprating the GE-158 turbine from 5.8 megawatts (MW) to 6.1 MW without altering its dimensions, increasing the project's nameplate capacity to 311.1 MW, eliminating two turbine locations, adding a collection line easement to avoid a Minnesota Department of Natural Resources (DNR) driveway, and relocating the operations & maintenance (O&M) building to collocate with the project substation.²

1. Response to EIP Staff.

On December 10, 2025, the EIP Staff submitted initial comments regarding the Request. In its initial comments, EIP Staff found that increase of nameplate capacity and removal of two of

¹ Notice of Comment Period of Site Permit Amendment (Nov. 26, 2025) (eDocket No. 202511-225344-01).

² See Big Bend Wind Site Permit Amendment Request (Oct. 31, 2025) (eDocket No. 202510-224488-01) (SPAR).

the potential turbine locations would not introduce new or significant environmental or human impacts compared to the original permit and would likely have been approved by the Commission initially. Noise and shadow flicker modeling for the uprated turbines remains consistent with prior analyses, and mitigation measures for shadow flicker have been addressed through landowner agreements. EIP Staff requested clarification on whether potential mitigation actions will benefit tenants of the participating landowner properties. EIP Staff emphasized that the northern long-eared bat (NLEB) should still be considered in environmental reviews despite its absence in Information for Planning and Consultation (IPaC) results.³

Here, Big Bend Wind responds to two main issues in EIP Staff's comments regarding shadow flicker and the NLEB.

a. Shadow Flicker.

Regarding shadow flicker management, EIP Staff recommends that Big Bend Wind provide clarification in the record as to whether all 16 participating landowners are currently living at the residences that will potentially experience 30 plus hours of shadow flicker per year. EIP Staff suggests that if any residences are rented out and the tenants, rather than the landowners, will be experiencing the shadow flicker, then Big Bend Wind should provide a discussion as to how it plans to ensure any implemented mitigation actions will benefit the tenants in the residence(s).⁴

Big Bend Wind has confirmed that the landowners who have signed shadow flicker waivers are residents of those parcels. Accordingly, no additional mitigation is proposed.

b. NLEB.

Regarding the NLEB, EIP Staff believe the assumption that the NLEB should not be considered as a species that could be impacted by the project is not appropriate or accurate. EIP Staff recommend that the environmental analysis of potential impacts to the NLEB should be included in environmental review.⁵

Big Bend Wind does not think that additional review is needed for the NLEB as it was discussed in the Environmental Assessment (EA).⁶ Additionally, Big Bend Wind recently e-filed a project-specific Bat Mist-Net Survey performed by Copperhead Environmental Consulting, Inc. (Copperhead)⁷ and a Qualitative Review of the Bat Acoustic Activity Survey prepared by Western

³ See EIP Staff Comments on Permit Amendment Request (Dec. 10, 2025) (eDocket No. 202512-225702-01) (EIP Staff Comments).

⁴ EIP Staff Comments at 6.

⁵ EIP Staff Comments at 8.

⁶ See EA at 337-338, 340-341, and 379 (Jan. 18, 2022) (eDocket Nos. 20221-181617-03, 20221-181617-08, and 20221-181617-13); Corrections to the EA (Jan. 25, 2022) (eDocket No. 20221-181968-02); and Corrections to the EA 2-22-22 (Feb. 8, 2022) (eDocket No. 20222-182544-01).

⁷ See Compliance Filing – Section 7.1, Appendix A_ Bat Mist-Net Survey (Dec. 11, 2025) (eDocket Nos. 202512-225776-03 and 202512-225776-04) (Bat Mist-Net Survey).

EcoSystems Technology, Inc. (WEST)⁸ as part of its Site Permit Section 7.1 compliance filings. Copperhead and WEST did consider the NLEB in the aforementioned evaluations, but no NLEB bats were confirmed present.⁹

2. Response to Mr. Brad Hutchison.

On December 10, 2025, Brad Hutchison submitted a comment expressing opposition to the proposed amendment for the Big Bend Wind's Large Wind Energy Conversion System Site Permit, arguing that a new EA is needed. He contends that the current EA relies on outdated data from 2019–2021, including sound monitoring and propagation modeling, which no longer reflect present conditions. Hutchison highlights the significant loss of tree cover due to Emerald ash borer infestation, which has altered topography and invalidated previous noise modeling assumptions, making claims of unchanged conditions inaccurate. He also points to a 2021 settlement involving the Minnesota Historical Society that required turbines to be placed seven miles from the Jeffers Petroglyphs to mitigate visual impacts, contrasting this with the proposed setback of roughly one-quarter mile for homeowners. Mr. Hutchison argues that similar protections should apply to residential properties and criticizes the waiver of wind access buffer setbacks. Finally, he calls for alternative plans, urging state leaders to either permit turbines on government land or acknowledge the harm to homeowners and pursue other energy options.¹⁰

Big Bend Wind provides the following clarifications in response to the issues raised by Mr. Hutchison. With respect to sound modeling, the Revised Sound Report included in the Request included several updates. First, the modeling used the latest available terrain data from U.S. Geological Survey (USGS) which is from 2023 for the southern half of the project and 2024 for the northern half of the project. The terrain in the model from USGS is bare earth; it is not the top of forest canopies. Second, the modeling conservatively does not consider the attenuating effects of forests; i.e., the modeling does not consider forest or trees, so the projected sound levels are conservatively higher than they might actually be in areas where large stands of dense forest are present. This doesn't invalidate the model but instead makes it more conservative. Respectfully, Big Bend Wind provides that the Revised Sound Report is an updated analysis in terms of turbine layout, sound power curves, receptors, and modeling inputs such as terrain.

Big Bend Wind offers that setbacks – both from Jeffers Petroglyphs and non-participating residences and parcels - were both studied in the EA. Turbine locations have not changed; two turbine locations have been removed from the layout. Additionally, as noted in the Request, Big

⁸ See Compliance Filing – Section 7.1, Appendix C_Bat Acoustic Qualitative Review of Results (Dec. 11, 2025) (eDocket Nos. 202512-225776-06 and 202512-225776-07) (Bat Acoustic Review).

⁹ See Bat Acoustic Review at 9; *see also* Bat Mist-Net Survey at 14.

¹⁰ See Brad Hutchinson Public Comment (Dec. 11, 2025) (eDocket Nos. 202512-225744-01 and 202512-225744-02).

Bend Wind has signed additional land agreements such that only one wind access buffer waiver is needed. This wind access buffer overlaps a long, rural driveway. The EA reviewed both setbacks and wind access buffers, and Big Bend Wind has worked to improve the layout and coordinate with landowners since the Site Permit was issued in September 2022.

3. Conclusion.

For the reasons stated above, the Company respectfully requests the Commission approve the Request. The Company agrees to abide by all the terms and conditions of the currently approved Site Permit, as modified by the requested amendments.¹¹

We have electronically filed this document with the Commission, and copies have been served on the parties on the attached service list. Please let me know if you have any questions regarding this filing.

Sincerely,

FREDRIKSON & BYRON, P.A.



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¹¹ See SPAR.

**In the Matter of the Application of Big Bend
Wind, LLC for a Large Wind Energy
Conversion System Site Permit for the up to
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Cottonwood and Watonwan Counties,
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CERTIFICATE OF SERVICE

Maia Martinez certifies that on the 16th day of December, 2025, she e-filed true and correct copy of the Site Permit Amendment Request on behalf of Big Bend Wind, LLC via eDockets (www.edockets.state.mn.us):

Said documents were also served as designated on the Official Service Lists on file with the Minnesota Public Utilities Commission and as attached hereto.

Executed on: December 16, 2025

Signed: /s/ Maia Martinez

Fredrikson & Byron, P.A.
60 South Sixth Street
Suite 1500
Minneapolis, MN 55402

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	19-61919-619
2	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		Yes	19-61919-619
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5	Adam	Duininck	aduininck@ncsrcc.org	North Central States Regional Council of Carpenters		700 Olive Street St. Paul MN, 55130 United States	Electronic Service		No	19-61919-619
6	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	19-61919-619
7	Lucas	Franco	lfranco@liunagroc.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	19-61919-619
8	Brenna	Gunderson	brenna.gunderson@apexcleanenergy.com	Apex Clean Eenergy		8665 Hudson Blvd N Ste 110 Lake Elmo MN, 55042 United States	Electronic Service		Yes	19-61919-619
9	Kate M	Heins	kate.heins@apexcleanenergy.com	Apex Clean Energy		310 4th St NE Ste 200 Charlottesville VA, 22902 United States	Electronic Service		Yes	19-61919-619
10	Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S. Eighth Street Minneapolis MN, 55402 United States	Electronic Service		No	19-61919-619
11	Dylan	Ikkala	dylan.ikkala@apexcleanenergy.com	Apex Clean Energy		8665 Hudson Blvd N Ste 110 Lake Elmo MN, 55042 United States	Electronic Service		Yes	19-61919-619
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14	Stacy	Kotch Egstad	stacy.kotch@state.mn.us	MINNESOTA DEPARTMENT OF TRANSPORTATION		395 John Ireland Blvd. St. Paul MN,	Electronic Service		No	19-61919-619

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15	James	LaFave	james.lafave@state.mn.us		Office of Administrative Hearings	600 N Robert Street St. Paul MN, 55164-0620 United States	Electronic Service		No	19-61919-619
16	Kevin	Maijala	kevin.maijala@mnhs.org		Minnesota Historical Society	null null, null United States	Electronic Service		No	19-61919-619
17	Samantha	Odegard	samanthao@uppersiouxcommunity-nsn.gov			PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	19-61919-619
18	Kevin	Pranis	kpranis@liunagroc.com		Laborers' District Council of MN and ND	81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	19-61919-619
19	Peter	Rademacher	prademacher@hogenadams.com			1935 County Road B2 West Suite 460 St. Paul MN, 55113 United States	Electronic Service		No	19-61919-619
20	Leif	Rasmussen	leif@steffensandrasmussen.com		Steffens & Rasmussen	6600 France Ave South Edina MN, 55435 United States	Electronic Service		No	19-61919-619
21	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	19-61919-619
22	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	19-61919-619
23	Ronald C	Schirmer	ronald.schirmer@mnsu.edu		Department of Anthropology	359 Trafton Science Center N Mankato MN, 56001 United States	Electronic Service		No	19-61919-619
24	Janet	Shaddix Elling	jshaddix@janetshaddix.com		Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	19-61919-619
25	Cheyenne	St. John	cheyanne.stjohn@lowersioux.com		Lower Sioux Tribal Community	39527 Reservation Hwy 1 Morton MN, 56270 United States	Electronic Service		No	19-61919-619
26	Haley	Waller Pitts	hwallerpitts@fredlaw.com		Fredrikson & Byron, P.A.	60 S Sixth St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		Yes	19-61919-619
27	Cynthia	Warzecha	cynthia.warzecha@state.mn.us		Minnesota Department of Natural Resources	500 Lafayette Road Box 25 St. Paul MN, 55155-4040 United States	Electronic Service		No	19-61919-619