

Staff Briefing Papers

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| Meeting Date | November 12, 2020 | Agenda Item *2 |
| Company | FPL Energy Mower County Wind, LLC | |
| Docket No. | IP-6557/WS-06-91 | |
| | In the Matter of the Site Permit Amendment to Repower the 98.9 Megawatt Mower County Wind Energy Center Project and Associated Facilities in Mower County, Minnesota | |
| Issues | 1. Should the Commission approve the request to amend the Mower County Wind, LLC Site Permit? | |
| Staff | Cezar Panait | Cezar.Panait@state.mn.us 651.201.2207 |

Relevant Documents

Date

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| Order Approving Site Permit Amendment | August 14, 2020 |
| Mower County Wind Petition for a Minor Amendment to Site Permit | Sept. 24, 2020 |
| DOC EERA Comments | October 9, 2020 |

Attachments

To request this document in another format such as large print or audio, call 651.296.0406 (voice). Persons with a hearing or speech impairment may call using their preferred Telecommunications Relay Service or email consumer.puc@state.mn.us for assistance.

The attached materials are work papers of the Commission Staff. They are intended for use by the Public Utilities Commission and are based upon information already in the record unless noted otherwise.

I. Statement of the Issues

1. Should the Commission approve the request to amend the Mower County Wind, LLC Site Permit?

II. Project Description

The permitted Mower County Wind Repowering Project is a 98.9 megawatt (MW), 43-turbine Large Wind Energy Conversion System (LWECS) located in Mower County, Minnesota. The requested minor amendment would allow replacing the blades of turbine 21 without increasing the rotor diameter of 93 meters.

III. Statutes and Rules

Permit Amendment. Under Minn. Rules 7854.1300, Sub. 2, the commission may amend a site permit for an LWECS at any time if the commission has good cause to do so.

IV. Permit Amendment Request

On August 14, 2020, Mower County Wind filed a request for a minor amendment to the site permit. Specifically, Mower County Wind seeks approval to replace the blades on turbine 21 with new blades, without increasing the existing rotor diameter of 93 meters. Replacement with blades of the same length will prevent impacts to a microwave beam path in the project area. Section 2 of the current permit does not include replacing the blades on turbine 21. Amending the permit to allow the blades to be replaced on turbine 21 allows the project to meet eligibility criteria for the Federal Production Tax Credit (PTC). The PTC is considered and awarded individually for each turbine, if meeting the threshold for substantial construction.

V. Comments on the Applicant's Petition

On October 1, 2020, the Commission issued a notice of comment period on the site permit amendment requesting comments by October 16, 2020 and reply comments by October 23, 2020.

On October 9, 2020, the Department of Commerce Energy Environmental Review and Analysis (EERA) staff provided comments on Mower County Wind's petition. EERA staff explained that it had reviewed the information provided by Mower County Wind and recommended that the

Commission approve the Permittee's proposed revision of Section 2 of the permit to allow for the turbine blades replacement. EERA staff recommended that the Commission approve the Permittee's requested permit amendment.

There were no reply comments received.

VI. Staff Discussion

Site Permit Amendment Request

Staff has reviewed the application for the site permit amendment and agrees with the EERA that the requested change is reasonable because it does not change the human or environmental impacts when compared to the old blades on turbine 21. The existing site permit includes conditions to ensure the wind farm repowering project is constructed in a safe and reliable manner, and that impacts are minimized or mitigated. In addition, there are no new impacts associated with this requested change. Therefore, staff recommends that the Commission approve Mower County Wind's site permit amendment request without additional conditions.

Site Permit Conditions

For the site permit, staff agrees that the requested modification of Section 2 is reasonable and provides clarification on the requested change. If approved by the Commission, Staff will add language in Section 2 of the site permit to read as follows:

2. Project Description

The project is a repowering of the existing Mower County Wind Farm's 43 Siemens wind turbines. The repowering includes (1) replacing the wind turbine blades, increasing the rotor diameter from 93 meters to 108 meters, for all turbines except turbine 21 (which blades will be replaced without increasing existing rotor diameter of 93 meters); (2) replacing equipment within the turbine nacelles; (3) upgrading turbine tower foundations with concrete collars; and (4) installing a lighting mitigation system.

No other changes are being proposed for the permit language or any of the permitted project maps.

VII. Decision Options

A. Mower County Wind Site Permit Amendment

1. Authorize the site permit amendment request without conditions.
2. Authorized the request with additional conditions, as deemed appropriate.
3. Take some other action deemed appropriate.

B. Revised Site Permit Language

1. Revise Site Permit Section 2 to read:

The project is a repowering of the existing Mower County Wind Farm's 43 Siemens wind turbines. The repowering includes (1) replacing the wind turbine blades, increasing the rotor diameter from 93 meters to 108 meters, for all turbines except turbine 21 (which blades will be replaced without increasing existing rotor diameter of 93 meters); (2) replacing equipment within the turbine nacelles; (3) upgrading turbine tower foundations with concrete collars; and (4) installing a lighting mitigation system.

2. Propose new language, as more appropriate.

C. Administrative Consistency

1. Authorize Commission staff to make refinements to the permit conditions or language as necessary to ensure consistency with the record, the language of recently issued permits, and the Commission's decision on this matter.

Staff Recommendation: A1, B1, and C1