

**m** DEPARTMENT OF  
NATURAL RESOURCES

Minnesota Department of Natural Resources  
Division of Ecological & Water Resources  
500 Lafayette Road  
St. Paul, MN 55155-4040

April 13, 2018

[Electronic Submittal]

Scott Ek  
Energy Facilities Planner  
Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul MN 55101

RE: In the Matter of the Site Permit Amendment Application for Proposed Upgrades to the Lake Benton Power Partners, LLC Wind Energy Generation Facility in Lincoln County, Minnesota  
PUC Docket Number: IP6908/WS-13-294


Dear Mr. Ek,

The Minnesota Department of Natural Resources (DNR) has reviewed Site Permit Amendment Application for the Lake Benton Power Partners Wind Project in Lincoln County. The applicant has proposed to upgrade the facility's turbines. The upgrades would consist of replacing equipment within the nacelle and turbine base (gearboxes, generators, and switchgear) and replacing the rotor assembly which includes the installation of longer turbine blades.

Section 5.0 (Adaptive Management and Operations Measures) of the Bird and Bat Conservation Strategy provided in Attachment E of the Site Permit Amendment Application lists adaptive management measures that could be considered for the project. The DNR recommends adding bat deterrent technology as an adaptive management measure. Bat deterrent technologies that use ultrasonic speakers to discourage bats from flying around operating wind turbines are under development. With ongoing improvements, such technology could be a viable method to reduce bat fatalities in the future.

The DNR appreciates the opportunity to comment on the Lake Benton Power Partners Wind Project. If you have any questions, please contact me at [cynthia.warzecha@state.mn.us](mailto:cynthia.warzecha@state.mn.us) or 651-259-5078.

Sincerely,



Cynthia Warzecha  
Energy Projects Planner

EC: Larry Hartman, Minnesota Department of Commerce  
William Sawyer, Allete Clean Energy  
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