

March 17, 2025

VIA eDOCKETS

Consumer Affairs Office
Minnesota Public Utilities Commission
127 7th Place East, Suite 350
Saint Paul, MN 55101-2147

RE: EERA Supplemental Comments on Request to Amend Permits

In the Matter of Applications of Plum Creek Wind Farm, LLC for a Certificate of Need, Site Permit, and Route Permit for an up to 414 MW Large Wind Energy Conversion System and 345 kV Transmission Line in Cottonwood, Murray, and Redwood Counties, Minnesota.

Docket Nos. IP-6997/WS-18-700, and TL-18-701

Dear Consumer Affairs Office:

Department of Commerce, Energy Environmental Review and Analysis (EERA) staff responds to comments filed by the Minnesota Department of Natural Resources (DNR) and Plum Creek Wind, LLC (Plum Creek) on the proposed site and route permit amendments. EERA also provides comments on the decommissioning plan for the project provided as Appendix B to the site permit amendment request.

EERA Comments on Site and Route Permit Amendments

EERA staff submitted its initial comments on the proposed permit amendments on February 5, 2025.¹ On February 12, 2025, the DNR² and Plum Creek³ provided reply comments. EERA staff appreciates the comments and information provided by DNR and Plum Creek.

Both DNR and Plum Creek support EERA's recommendation for additional permit conditions requiring Plum Creek to:

- Use biodegradable netting and mulch products and to use non-chloride based dust control methods (both the site and route permits).
- Use downward facing and avoid blue hued lights at the project substations (site permit).

¹ EERA, March 5, 2025, Comments and Recommendations, eDocket ID: [20253-216089-01](#)

² Minnesota Department of Natural Resources, March 12, 2025, Comment Letter, eDocket ID: [20253-216345-01](#), [20253-216345-02](#)

³ Plum Creek Wind, March 12, 2025, Comment Letter, eDocket ID: [20253-216336-01](#)

- Survey the route width of the proposed route segment in Section 6 of Ann Township and develop a mitigation plan in cooperation with DNR that addresses construction and operation of the transmission line in this area (route permit).

Plum Creek also supported EERA's additional recommendations to update certain standard conditions for both site and route permits and add new special conditions requiring Plum Creek to file recommendations from the Minnesota State Historic Preservation Office (SHPO) when available and prepare an unanticipated discoveries plan.

In response to EERA's request Plum Creek filed information to clarify the status of its coordination with the SHPO, turbine manufacturer's cut-in speed, and information on the status of right-of-way acquisition along the proposed segment.

EERA Comments on Decommissioning Plan

Section 11.1 of the site permit requires the permittee to file an updated decommissioning plan incorporating comments and information from the permit application process prior to construction. EERA staff has reviewed the draft decommissioning plan (draft plan) for the proposed Plum Creek Wind Project included as Appendix G of the Site Permit Amendment Request and recommends Plum Creek make changes to several portions of the draft plan.

EERA staff's review is guided by the recommendation of the Solar and Wind Decommissioning Working Group (SWDWG). As discussed in EERA staff's recommendations on decommissioning plans in Docket 17-123, the decommissioning plan should serve as a stand-alone document to orient the reader to the project as it is on the ground.

- **General Comments:**
 - The cover should include docket numbers for both the wind project (IP-6997/WS-18-700) and the transmission line (IP-6997/TL-18-701).
 - If a BESS facility is added to the project,⁴ the decommissioning plan should be updated to include information on the BESS facility as well as the wind project and transmission line.
 - Replace "applicant" with "Plum Creek Wind" or "Plum Creek" or something similar throughout the document. At the point of preconstruction, Plum Creek Wind will be a permittee, not an applicant. If, at some point in the future, ownership of the facility changes, the decommissioning plan should be updated to identify the responsible party.
 - Use "site," rather than "project area" to refer to the site identified in the site permit.
- **Independent Preparer:** Meets EERA expectations. The plan and cost estimate have been prepared by Westwood Professional Services.

⁴ Plum Creek indicated in its Site Permit Amendment Request, that it is considering the addition of a battery storage project and, if it pursues that option, will seek a site permit for a battery energy storage system in a separate docket. Plum Creek, Site Permit Amendment Request, February 4, 2025, eDocket ID: [20252-214951-02](#), p. 14

- **Decommissioning Objective:** The text in in paragraph 2 of the introduction meets EERA expectations, but EERA recommends that text be combined with section 2 and the heading changed to “Decommissioning Objective.”
- **Scheduled Updates:** Does not meet EERA expectations. EERA recommends adding a section on the schedule for updates at five-year intervals under a separate header. At this stage, EERA staff recommends a “permit version” of the decommissioning plan filed with pre-construction documents, and then scheduled updates every five years thereafter. The plan should also be updated any time there is a change in ownership or permit amendment.
- **Project Description:** EERA recommends that the pre-construction version of the plan be updated to include:
 - Anticipated date of commercial operation (will be updated once this is certain).
 - More detailed maps. Although the map included in Attachment A is adequate for a draft plan, EERA recommends that the pre-construction plan include more detailed maps showing the actual turbine locations, project substations, O&M facility, and transmission line on an aerial background
 - The date and eDocket location of the site and route permits when issued. Future updates should also reference past decommissioning plans and provide a link to those plans.
 - More detail on the location of both the wind facility and transmission line. Given the size of the project, a table may be the best way to identify the counties township names, as well as township, range, and sections.
 - More detail on the project including the size of the wind site in acres, turbine models, length of transmission line, length of access roads and underground cabling, number of Sonic Detection and Ranging (SoDAR) or Light Detection and Ranging (LiDAR) units, and number of Aircraft Detection and Lighting Systems (ADLS) units.
 - A short statement on landownership. Clarify the landownership at the time of construction. Clarify whether Plum Creek owns or leases the site.
 - The anticipated life of the facility. The introduction indicates the useful life of the turbines to be 30 years, please clarify the expiration date of the permit.
- **Use of Generation Output.** Does not meet EERA expectations. The pre-construction version of the plan should include a general statement of where the generation will be used under a separate heading. Examples include, but are not limited to:
 - Power Purchase Agreement (PPA). For any portion of the output sold through a PPA, the description should include the offtaker and the expiration date of any PPA(s).
 - Utility-owned generation portfolio.
- **Permits and Notifications:** Partially meets EERA expectations. The plan should include a list of anticipated permits, expanding on the information included in Section 4.4. EERA recommends that the permits and notification sections (sections 4.4 and 4.6 in this draft) be combined under a single heading, rather than as a subheadings under best practices. Recently issued permits

require the decommissioning plan be provided to local governments, so plan to document compliance with that provision once the plan is filed as a pre-construction document.

- **Tasks and Timing:** Partially meets EERA expectations. EERA recommends the pre-construction plan include additional information on assumptions and timeframe for completing decommissioning. EERA recommends the pre-construction plan include:
 - A more detailed description of the transmission line in Section 3.1.9. The description should include the length of the transmission line, the locations of both substations, and some detail on the tasks required to remove the transmission structures and conductors.
 - A description of resale potential for components. Several sections of the plan refer to potential resale of components, but the description of turbine felling and the cost estimates indicate that components may be scrapped or potentially recycled, not resold. Please clarify which components, if any, may have a resale market.
 - Clarity whether turbine components will be disassembled and processed at the site where the turbines are felled, or whether components will be hauled to a central location for processing before loading onto trucks (Section 3.1.4).
 - A short section in the text that generally discusses assumptions for disposal and identifies landfill, recycling, and resale facilities in place at this time (see, for example, Section 2.5 of 2021 the [decommissioning plan](#) for Sherco Solar). Some of this information (Cottonwood County Sanitary Landfill, Hilltop Recycling in Sanborn, MN, and the Veolia Louisiana, MO) are referenced parenthetically in the assumptions that follow the estimated cost tables. EERA anticipates these facilities may change as the project ages, but calling this information out in its own subsection makes it easier identify whether updates are needed.
 - Provide some additional detail on the timeframe/schedule for decommissioning. A Gantt chart is not necessary at this time, but something more detailed than “one year.” (see, for example, section 2.3 of the 2021 decommissioning plan for Sherco Solar.
 - Section 3 anticipates that in some cases, landowners may wish to leave elements of the project in place. EERA notes that Section 11.2 of the site permit requires the permittee to remove all equipment to a depth of four feet and that any agreement project elements remain or be removed to a lesser depth be recorded with the county.
- **Cost Estimate:** Meets EERA expectations at this time. The estimate includes both gross and net costs in the body of the plan and additional detail in Appendix B.
- **Financial Assurance:** Does not meet EERA expectations. Consistent with the Working Group’s recommendations, EERA recommends that the plan identify the financial assurance instrument(s) contemplated by Plum Creek, a timeline for funding the financial assurance, and a beneficiary of the financial surety. EERA recommends that financial assurance begin no later than year 10 and that the surety provide for full decommissioning costs prior to the expiration of any PPA. EERA also recommends that the beneficiary be a governmental unit rather than individual landowners. EERA anticipates bringing the matter to the Commission at the time to surety is established to allow the Commission to weigh in on the plan.

EERA staff appreciates the opportunity to provide these comments to the Commission and is available to answer any questions the Commission might have.

Sincerely,

A handwritten signature in cursive script that reads "Suzanne Steinhauer". The signature is written in black ink and is positioned below the word "Sincerely,".

Suzanne Lamb Steinhauer
Environmental Review Manager
Energy Environmental Review and Analysis