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August 31, 2022

Public Advisor
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: In the Matter of the Application for a Site Permit Amendment to Repower the 200 MW Pleasant Valley Large Wind Energy Conversion System in Dodge and Mower Counties, Minnesota

PUC Docket Number: E-002/WS-09-1197

Dear Consumer Affairs Staff,

On August 2, 2022, the Minnesota Public Utilities Commission (PUC) and the Minnesota Department of Commerce (DOC) issued a Notice of Public Information Meeting on the application of Xcel Energy (Applicant) for an amendment to the site permit for the Pleasant Valley Wind large wind energy conversion system in Dodge and Mower counties. The Minnesota Department of Transportation (MnDOT) has reviewed the information regarding the Site Permit Amendment Application and submits the following comments in response to the Notice.

In addition to comments and construction (STIP) plans previously provided to the Applicant and included in Appendix D of the amended application, MnDOT offers these additional comments for consideration.

With any repowered or updated wind project, existing turbine locations in proximity (minimum 250-foot setback) to state trunk highway right of way warrant concern regarding the proposed height increases as they relate to the safety of the traveling public in the project area. MnDOT believes these proposed height changes should be taken into consideration when reviewing the potential human and environmental impacts of this project and not solely as they apply to our agency's concerns. While there are several turbine locations in the vicinity of trunk highway (TH) 56, none appear close enough to state trunk highway right of way to present a concern for MnDOT currently.

Should any of the existing, permanent points of access or collection line locations need to change from the original project, the Applicant will need to work with MnDOT District 6 staff on new utility or access permits for those locations. Additionally, any state highways or state highway intersections that will need minor upgrading or modifications to deliver new equipment, or haul replaced equipment, would require the same coordination. It should be noted that all utility permit applications are subject to review by our Office of Environmental Stewardship which could result in additional permitting criteria and/or a request to move work areas outside of significant areas of environmental concern.

Any temporary roadway signage used during project construction should be made and placed in a way that can withstand winter wear. MnDOT has been made aware of failing/falling signage during winter

months on several large energy projects within the state. MnDOT's District Traffic Engineers can assist the Applicant with this process when construction coordination efforts commence.

Any MnDOT permits applied for as a part of this repower project will not be issued until the PUC has issued an approved, amended Site Permit for this project. The Applicant should ensure that all MnDOT permits applied for make note of the PUC docket number(s) for cross-reference and agency collaboration. All applicable permitting, traffic control and construction coordination efforts should be made through Jonathan Keranen, Engineering Specialist in the District 6B Permits Office at 507-456-5347 or jonathan.keranen@state.mn.us. MnDOT District Specialists should be given the opportunity to participate in pre-construction meetings as they apply to MnDOT owned property.

MnDOT has a continuing interest in working with the PUC, the DOC EERA and the Applicant to ensure that possible impacts to the entire state trunk highway system, traveling public and environmentally significant areas of concern are adequately addressed.

Thank you for the opportunity to provide these comments.

Sincerely,

Stacy Kotch Egstad

Utility Routing and Siting Coordinator
Minnesota Department of Transportation
Office of Land Management
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cc: Jon Keranen – MnDOT District 6 Permits

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