



414 Nicollet Mall
Minneapolis, MN 55401

September 19, 2022

—Via Electronic Filing—

Will Seuffert
Executive Secretary
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
DOCKET NO. IP-6830/WS-09-1197

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy (Company or Xcel Energy) submits these reply comments in response to the comments received during the public information meetings' written comment period ending August 31, 2022 concerning Xcel Energy's Application for a Site Permit Amendment to Repower the 200 MW Pleasant Valley Large Wind Energy Conversion System in Dodge and Mower Counties, Minnesota ("Project"). These reply comments respond to the initial comments filed by:

- Mark C. Preul, Owner of M&K Preul Farms LLC (efiled August 30, 2022);
- Mower County (efiled August 31, 2022);
- Minnesota Department of Natural Resources ("MNDNR") (efiled August 31, 2022);
- Minnesota Department of Transportation, Office of Land Management ("MNDOT") (efiled August 31, 2022); and
- Roger Nelson, Mayor of Sargeant, Minnesota (email dated August 23, 2022, efiled September 12, 2022).

Questions and comments already addressed by the Project's site permit applications or those which are not relevant to siting decisions are not addressed in these reply comments.

Mark C. Preul

Xcel Energy is implementing several measures, as described in the Application, to minimize soil disturbance during construction, and agricultural practices can continue in the project vicinity in concert with wind energy production for the life of the Project. While Mr. Preul has requested an advisory taskforce and/or contested case, he has not identified any disputed facts, alternative sites, or additional mitigation to be developed through these additional processes. Accordingly, Xcel Energy requests that the Commission deny these requests.

Mower County

Mower County provided comments on public road impacts, decommissioning, approvals for the project laydown yard and potential communication system impacts. Xcel Energy responds to each of these comments as follows:

- Xcel Energy looks forward to working with Mower County on a Road Use Agreement to address any potential changes to access roads and other traffic and permitting-related issues. Xcel Energy also welcomes the county's participation in the Pre-construction meeting required in Draft Site Permit section 5.6.
- Concerning Mower County's comments on decommissioning, Xcel Energy believes that all components from the re-powered wind farm can be removed from turbine sites within 12 months from the date of the first turbine replacement.
- Xcel Energy has included the project laydown yard in its Application to the Commission for approval as part of the amended site permit. Xcel Energy will work with Mower County on any local permits, if required, for project features not already approved in the Site Permit.
- With regard to potential impacts to communication systems, Xcel Energy will not interfere with either the registered beam path routes or the reserve beam path routes, as discussed more fully in the Application.

MNDNR

Xcel Energy appreciates the MNDNR's review and comments and has no issue complying with their recommendations. Xcel Energy will prepare a Prairie Protection and Management Plan in consultation with the DNR if native prairie is identified within the site boundaries.

MnDOT

Xcel Energy appreciates the MnDOT's review and comments and has no issue incorporating their recommendations. Xcel Energy will work with MnDOT to ensure that possible impacts to the entire state trunk highway system, traveling public and environmentally significant areas of concern are adequately addressed.

Roger Nelson

Mr. Nelson raised concerns regarding the original turbine siting and noise impacts within the city limits of Sargeant, Minnesota. As originally sited and constructed, the Project complies with all site permit conditions, including applicable setbacks. For example, the nearest turbine to a residence in Sargeant is approximately 1,600 feet, and the Project meets the State Noise Standards. The re-powered windfarm, as proposed, will continue to meet all requirements in the proposed amended draft site permit, including setback, noise, and shadow flicker, among other requirements.

Conclusion

Xcel Energy looks forward to further stakeholder coordination as the Pleasant Valley Repower Project moves forward.

These reply comments have been e-filed today through www.edockets.state.mn.us. A copy of this filing is also being served upon the persons on the Official Service Lists of record. Please let me know if you have any questions regarding this filing.

Please contact Matt Langan at matthew.a.langan@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/ Matt Langan

MATT LANGAN
PRINCIPAL AGENT, SITING AND LAND RIGHTS
XCEL ENERGY

c: Service Lists

**IN THE MATTER OF THE
APPLICATION FOR A SITE PERMIT
AMENDMENT TO REPOWER THE 200
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CERTIFICATE OF SERVICE

Malinda M. Maier certifies that on the 19th day of September 2022, she e-filed true and correct copy the following documents on behalf of Xcel Energy Services Inc. via eDockets (www.edockets.state.mn.us).

1. Reply Comments; and
2. Certificate of Service.

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: September 19, 2022

Signed: /s/ Malinda M. Maier

Fredrikson & Byron, P.A.
200 South Sixth Street
Suite 4000
Minneapolis, MN 55402

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	No	OFF_SL_9-1197_Official
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_9-1197_Official
James	Hartson			59931 300th Street Waltham, MN 55982	Paper Service	No	OFF_SL_9-1197_Official
Eric	Lee	N/A		27503 670th Ave Dexter, MN 55926	Paper Service	No	OFF_SL_9-1197_Official
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_9-1197_Official
Peter	Reinarts	preinarts@myclearwave.net	Olmsted Wind Truth	11748 Hwy 30 SW Hayfield, MN 55940	Paper Service	No	OFF_SL_9-1197_Official
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	No	OFF_SL_9-1197_Official
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_9-1197_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_9-1197_Official
Valerie	Sheedy	valeries@co.mower.mn.us	Mower County	N/A	Electronic Service	No	OFF_SL_9-1197_Official
Dawayne	Skov	N/A		700 1st St NW, #258 Austin, MN 55912	Paper Service	No	OFF_SL_9-1197_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources	500 Lafayette Road Box 25 St. Paul, Minnesota 55155-4040	Electronic Service	No	OFF_SL_9-1197_Official