

March 21, 2025

**VIA E-FILING**

Mr. William Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
Saint Paul, MN 55101-2147

**Re: 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**

**MPUC Docket Nos. IP-6997/CN-18-699, WS-18-700, TL-18-701**

Dear Mr. Seuffert:

Plum Creek Wind Farm, LLC (Plum Creek) respectfully submits this response to comments submitted by the Minnesota Department of Commerce, Energy and Environmental Analysis unit (EERA) during the supplemental comment period established in the Minnesota Public Utilities Commission's (Commission) Notice of Comment Period on Request to Amend Permits ending on March 17, 2025, for the Plum Creek Wind Farm Project (Project).<sup>1</sup> Plum Creek is amenable to the decommissioning plan revisions proposed by EERA and, accordingly, all comments raised during the comment period have been addressed and the amendments are ready for Commission approval.

In its supplemental comments EERA noted the agreement between the Minnesota Department of Natural Resources (DNR), Plum Creek and EERA on the DNR's requested and EERA's recommended permit conditions addressing natural resource concerns.<sup>2</sup> The requested permit conditions are included in the revised permits included in Plum Creek's reply comments. EERA acknowledged that Plum Creek filed the supplemental information requested by EERA in its initial comment letter.<sup>3</sup> EERA also recommended that Plum Creek make changes to several portions of the draft decommissioning plan for the Project.<sup>4</sup>

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<sup>1</sup> See EERA Supplemental Comments (March 17, 2025) (eDocket No. 20253-216461-01); *see also* DNR Comments (March, 12, 2025) (eDocket Nos. 20253-216345-01 and 20253-216345-02).

<sup>2</sup> EERA Supplemental Comments at 1-2 (March 17, 2025) (eDocket No. 20253-216461-01).

<sup>3</sup> See EERA Supplemental Comments at 2 (March 17, 2025) (eDocket No. 20253-216461-01); *see also* Plum Creek Reply Comments (March 12, 2025) (eDocket No. 20253-216336-01).

<sup>4</sup> See EERA Supplemental Comments at 2 (March 17, 2025) (eDocket No. 20253-216461-01); *see also* Site Permit Amendment Request - Appendix B (Feb. 4, 2025) (eDocket No. 20252-214951-04).

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Plum Creek thanks EERA for its comments and is amenable to the changes proposed by EERA to the Project's draft decommissioning plan. Plum Creek commits to making those changes, working with EERA to ensure the revised decommissioning plan addresses EERA's comments and filing an updated decommissioning plan as a pre-construction compliance filing.

As there are no remaining issues to address, Plum Creek respectfully requests that the Commission approve its requests to amend the certificate of need, site permit, and route permit.

These comments have been e-filed through [www.edocket.state.mn.us](http://www.edocket.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.

Sincerely,

FREDRIKSON & BYRON, P.A.

*/s/ Jeremy P. Duehr*

Jeremy P. Duehr  
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**In the Matter of Applications of Plum Creek  
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Murray, and Redwood Counties  
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18-700, TL-18-701**

**CERTIFICATE OF SERVICE**

Breann L. Jurek certifies that on the 21<sup>st</sup> day of March, 2025, she e-filed on behalf of Plum Creek Wind Farm, LLC, a true and correct copy of its Supplemental Reply Comments via eDockets ([www.edockets.state.mn.us](http://www.edockets.state.mn.us)).

Said document was also served as designated on the Official Service Lists on file with the Minnesota Public Utilities Commission and as attached hereto.

Executed on: March 21, 2025

*Signed: /s/ Breann L. Jurek*

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Fredrikson & Byron, P.A.

60 South Sixth Street

Suite 1500

Minneapolis, MN 55402

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Lisa	Agrimonti	lagrimonti@fredlaw.com	Fredrikson & Byron, P.A.		60 South Sixth Street Suite 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	18-699Official Service List
2	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	18-699Official Service List
3	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	18-699Official Service List
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5	Bret	Eknes	bret.eknes@state.mn.us		Public Utilities Commission	Suite 350 121 7th Place East St. Paul MN, 55101-2147 United States	Electronic Service		No	18-699Official Service List
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11	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	18-699Official Service List
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						St. Paul MN, 55164 United States				
13	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	18-699Official Service List
14	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	18-699Official Service List
15	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	18-699Official Service List
16	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	18-699Official Service List
17	Bill	Storm	bill.storm@state.mn.us		Department of Commerce	Room 500 85 7th Place East St. Paul MN, 55101-2198 United States	Electronic Service		No	18-699Official Service List

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4	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	18-700Official Service List
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8	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	18-700Official Service List
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