

**ENERGY INFRASTRUCTURE PERMITTING STAFF
COMMENTS AND RECOMMENDATIONS ON AN AMENDED SITE PERMIT**

Big Bend Wind Project

DOCKET NO. IP-7013/WS-19-619

Date: December 10, 2025

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In the Matter of the Application of Big Bend Wind, LLC for a Large Wind Energy Conversion System Site Permit for the up to 300 MW Big Bend Wind Project in Cottonwood and Watonwan Counties, Minnesota.

Issues Addressed: These comments and recommendations address Big Bend Wind, LLC's request for amendments to its site permit for the Big Bend Wind Project.

Additional documents and information can be found on eDockets:

<https://www.edockets.state.mn.us/documents> (19-619) and on the Commission's website:

<https://puc.eip.mn.gov/web/project/14153>.

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Introduction and Background

On September 28, 2022, the Commission issued an order granting a certificate of need and issuing a site permit and a route permit to Big Bend Wind, LLC (Big Bend or permittee) for the construction and operation of the Big Bend Wind Project,¹ a 300 megawatt (MW) large wind energy conversion system (LWECS) in Cottonwood and Martin counties,² and an approximately 18 mile long 161 kilovolt (kV) transmission line in Cottonwood, Watonwan, and Martin counties to connect the project substation to the Xcel Energy Crandall 345 kV switching station.³

The site permit was for a wind project of up to 300 MW, consisting of up to 52 Nordex N-163 turbines (5.94 MW), 52 Vestas V162 turbines (6.0 MW) or 52 General Electric (GE) GE-158 turbines (5.8 MW).⁴ On

¹ Commission, *Order Issuing Permits*, September 28, 2022, eDocket No. [20229-189351-05](#)

² Commission, *Attachment 1*, September 28, 2022, eDocket No. [20229-189351-10](#)

³ Commission, *Attachment 3*, September 28, 2022, eDocket No. [20229-189351-20](#)

⁴ Commission, *Attachment 1*, September 28, 2022, eDocket No. [20229-189351-10](#)

September 18, 2024, Big Bend requested a site permit extension, to extend the construction start deadline on the project to September 28, 2027.⁵ On November 26, 2024, the Commission approved the requested extension of the deadline to begin construction.⁶

On October 31, 2025, Big Bend filed a request to amend their site permit.⁷ Since issuance of the site permit and the revised construction deadline, Big Bend has identified turbine technology changes and site layout modifications that would appropriately be addressed by amending the site permit. Big Bend has requested this amendment to the site permit under Minn. Stat. § 216I.09 and Site Permit Section 13.0.

Big Bend is seeking to amend the site permit as follows:

- Turbine technology changes
 - Remove Nordex N-163 turbine from consideration
 - Upgrade the GE-158 turbine from a capacity of 5.8 MW to 6.1 MW, this comes with no changes in the turbine's dimensions;
- Site layout changes
 - Remove two possible turbine locations
 - Addition of a collection line easement, avoiding a collection line crossing a Minnesota Department of Natural Resources (MDNR) driveway
 - Shifting the location of the project's O&M building so it is collocated with the Project substation (location was previously planned, reviewed, and permitted to be the location of Red Rock Solar substation⁸)

On November 26, 2025, the Commission issued a notice⁹ soliciting comments on Big Bend's site permit amendment request (2025 SPAR). The Commission identified the following topics for comment:

- Are there any new or changed human or environmental impacts from the redesigned project when compared to the original project?
- If the proposed design changes were known to the Commission at the time the site permit was issued, would the Commission have made a different decision?

⁵ Big Bend Wind, LLC, *Filing Letter with Request for Extension*, September 18, 2024, eDocket No. [20249-210300-01](#)

⁶ Commission, *Order*, November 26, 2024, eDocket No. [202411-212440-01](#)

⁷ Big Bend Wind, LLC, *Site Permit Amendment Request Letter* (2025 SPAR), October 31, 2025, eDocket No. [202510-224488-01](#), [202510-224488-02](#), [202510-224488-03](#), [202510-224488-04](#), [202510-224488-05](#), 202510-224488-06 (Non-public), [202510-224488-07](#), [202510-224488-08](#), [202510-224488-09](#), [202510-224488-10](#)

⁸ Commission, *Attachment 2*, September 28, 2022, eDocket No. [20229-189351-15](#)

⁹ Commission, *Notice of Comment Period on Site Permit Amendment*, November 26, 2025, eDocket No. [202511-225345-01](#)

- Should the Commission approve Big Bend Wind's petition to amend the site permit for the Big Bend Wind Project?
- Are there other issues or concerns related to this matter?

Regulatory Process and Procedures

Under Minn. Stat. §216I.09, the owner of a large energy infrastructure facility may request to modify any provision or condition of a site or route permit issued by the Commission. Applicants requesting an amendment must describe the alteration to be made or the amendment sought and must describe any changes to the environmental impacts evaluated by the Commission as part of the initial permit approval. After a public comment period, the Commission must decide whether to authorize a requested permit amendment or determine that some other action is required. The Commission may impose reasonable conditions on any amendment it authorizes.

EIP Staff Analysis and Comments

Energy Infrastructure Permitting (EIP) staff have reviewed the amendment request and supporting documents and provides the following analysis and comments in response to the Commission's notice.

Staff comments are focused on whether the Commission should amend the site permit and, if so, what modifications to the existing permit conditions or additional conditions should be required. Staff has reviewed Big Bend's proposed site permit amendments, including a number of technical changes to reflect statutory updates and incorporation of project information from the 2025 SPAR. Staff has recommended permit amendments to clarify compliance requirements.

Staff has not identified other issues or concerns related to the matter.

Site Permit Amendment Request

Big Bend indicates the site permit should be amended to address changes to turbine technology, site layout changes, and Minn. Stat. Ch. 216I becoming effective since the site permit was issued.¹⁰ Staff comments on Big Bend's 2025 SPAR are focused on the change in the turbine technology being considered, change in the number of turbines, change in the collector line location, and the proposed collocation of the O&M building adjacent to the project substation. Staff has also provided comments specific to the proposed project amendment and analysis of potential project impacts to the northern long-eared bat (*Myotis septentrionalis*).

¹⁰ Big Bend Wind, LLC, *Site Permit Amendment Request Letter* (2025 SPAR), October 31, 2025, eDocket No. [202510-224488-01](#), [202510-224488-02](#), [202510-224488-03](#), [202510-224488-04](#), [202510-224488-05](#), 202510-224488-06 (Non-public), [202510-224488-07](#), [202510-224488-08](#), [202510-224488-09](#), [202510-224488-10](#)

Changes in Turbine Technology

Big Bend is requesting approval to utilize an uprated version of turbine model GE-158, which has the same dimensions, perimeters, and turbine locations as the previously approved turbine models. The GE-158 turbine model has been uprated from 5.8 MWs to 6.1 MWs, resulting from improved turbine efficiency and output.

Staff has reviewed Big Bend's noise modeling and shadow flicker modeling based on the proposed change in turbine technology. The request to use the uprated GE-158 wind turbine is consistent with the noise modeling and shadow flicker modeling in the September 2021 Supplemental and Amended Site Permit Application (2021 Amended SPA)¹¹ and the record supporting the Commission's original permit decision in September 2022 and revised permit decision in December 2024.¹²

Noise

Staff has reviewed the permittee's noise assessment and potential noise impacts of the uprated GE-158 turbine model, and the uprated GE-158 turbine is anticipated to have the same turbine-only noise and total sound (background + turbine) when compared to the noise assessment for GE-158 in the 2021 Amended SPA.¹³ Big Bend has modeled noise for the proposed uprated GE-158 turbines, considering residences within one mile of the site boundary. The modeling showed turbine-only sound at 47 dBA for the closest residence.¹⁴

¹¹ Big Bend Wind, LLC, Supplemental and Amended Site Permit Application (2021 Amended SPA), September 20, 2021, eDocket No. [20219-178112-02](#), [20219-178112-03](#), [20219-178112-04](#), [20219-178112-05](#), [20219-178112-06](#), [20219-178115-01](#), [20219-178115-02](#), [20219-178115-03](#), [20219-178115-04](#), [20219-178115-05](#), [20219-178115-06](#), [20219-178115-07](#), 20219-178115-08, 20219-178115-09, [20219-178117-01](#), [20219-178117-02](#), [20219-178117-03](#), [20219-178117-04](#), [20219-178117-05](#), [20219-178117-06](#), [20219-178117-07](#), [20219-178117-08](#), [20219-178117-09](#), [20219-178120-01](#), [20219-178120-02](#), [20219-178120-03](#), [20219-178120-04](#), [20219-178120-05](#), [20219-178120-06](#), [20219-178120-07](#), 20219-178125-01, 20219-178125-02, 20219-178125-03, 20219-178125-04, 20219-178125-05, 20219-178125-06, [20219-178125-07](#), [20219-178125-08](#), [20219-178125-09](#), [20219-178125-10](#), [20219-178127-01](#), [20219-178127-02](#)

¹² Commission, Revised Site Permit, December 23, 2024. eDocket No. [202412-213281-01](#)

¹³ Big Bend Wind, LLC, 2021 Amended SPA and Appendix E Amended Noise Analysis, September 20, 2021. eDocket Nos. [20219-178112-02](#), [20219-178117-01](#), [20219-178117-02](#), [20219-178117-03](#), [20219-178117-04](#), [20219-178117-05](#)

¹⁴ Big Bend Wind, LLC, 2025 SPAR, pp. 4-6 eDocket No. [202510-224488-01](#) and Appendix C, October 31, 2025. eDocket No. [202510-224488-05](#)

Table 1. Noise Modeling Comparison GE-158 Turbine and Uprated GE-158 Turbine

		GE-158 – 5.8 MW (Revised Application and Permitted)	Uprated GE-158 – 6.1 MW (Permit Amendment)
Turbine-Only Noise	Avg L ₅₀ Modeled	33	33
	Max L ₅₀ Modeled	47	47
	Min L ₅₀ Modeled	18	17
Total Sound (Background (33 dBA) + Turbine)	Avg L ₅₀ Modeled	36	36
	Max L ₅₀ Modeled	47	47
	Min L ₅₀ Modeled	33	33

The anticipated noise impacts of the project with the proposed turbine technology changes are consistent with the permit. Section 4.3 of the permit requires the project to comply with the Minnesota Pollution Control Agency (MPCA) noise standards at all times and section 7.4 requires the permittee to conduct a post-construction noise evaluation once the project is operating. Big Bend plans to use low-noise trailing edge (LNTE) blades and one turbine may be operated in Noise Reduced Operations (NRO) mode if the uprated GE-158 turbines are selected for the project.

Big Bend has not proposed to modify portions of the permit requiring that the project comply with MPCA noise standards (section 4.3) and staff does not believe any amendments to this section of the permit are necessary. Big Bend proposed amending the post-construction noise evaluation (section 7.4); to remove reference to the Department of Commerce and include reference to Commission staff. Staff supports technical changes to this section of the permit to clarify that the noise monitoring protocol should be developed in consultation with Commission staff rather than staff from the Department of Commerce.

Shadow Flicker

Big Bend modeled potential shadow flicker for the proposed turbine models and layouts in its 2021 Amended SPA and in the 2025 SPAR. Modeling for both the layouts shown in the 2021 Amended SPA and the SPAR used conservative assumptions (constant sun with no clouds during daytime hours, turbines running continually, windows on all sides, no buildings or vegetation that would serve as obstructions) and is likely to overestimate the actual shadow flicker experienced by nearby residents.

Table 2. Modeled Shadow Flicker Comparison GE-158 Turbine and Uprated GE-158 Turbine

	2021 Amended SPA		2025 SPAR	
	Participating	Non-Participating	Participating	Non-Participating
Maximum Shadow Flicker (Hours: Minutes)/Year	57:10	23:56	57:02	24:04

Modeling in the 2021 Amended SPA, which provided the analysis supporting the Commission's September 2022 original site permit and the 2024 revised site permit, showed a maximum shadow flicker for the GE-158 turbine of approximately 23 hours and 56 minutes per year for non-participating receptors and 57 hours and 10 minutes per year for participating receptors. The modeled maximum shadow flicker for the uprated GE-158 turbines is approximately 24 hours and 4 minutes per year for non-participating residences and 57 hours and 2 minutes for participating residences.

The uprated GE-158 turbine would expose 16 participating landowners to 30 plus hours of shadow flicker per year, and no non-participating landowners will be exposed to over 30 hours of shadow flicker per year. Big Bend has met with all of the participating landowners that were modeled to experience 30 plus hours of shadow flicker per year and explained potential impacts and mitigations to them. Each participating landowner has signed a shadow flicker waiver with Big Bend.

EIP staff recommends Big Bend provide clarification in the record as to whether all 16 participating landowners currently live at the residences that will potentially experience 30 plus hours of shadow flicker per year. If any residences are rented out and the tenants, rather than the landowners, will be experiencing the shadow flicker there should be discussion as to how Big Bend plans to ensure any implemented mitigation actions will benefit the tenants in the residence(s).

Big Bend has not proposed any changes to the condition requiring preparation of a shadow flicker management plan (section 7.2), except for a technical change removing reference to Department of Commerce; staff does not recommend changes to this permit condition.

Increased Nameplate Capacity

Big Bend has requested an increase in the project's name plate capacity from 300 MW to 311.1 MW, approximately a four (4) percent increase from what is currently permitted. Additional context for the name plate capacity increase requested is important; the original site permit application for the project requested a capacity of up to 308 MW.¹⁵

The original project was proposed as a hybrid energy generation facility to work with the previously permitted Red Rock Solar Project, which is currently not planned to be constructed and operated. The

¹⁵ Big Bend Wind, LLC, *Initial Site Permit Application*, November 9, 2020. eDocket No. [202011-168170-02](#)

hybrid wind and solar energy facility was anticipated to potentially generate up to 335 MW. The environmental analysis for the wind, solar, and hybrid project were conducted in manner so no additional analysis would be necessary to proceed with only the wind energy facility.

At this time, the only turbine location changes proposed are the removal of two possible turbine locations, and the proposed uprated GE-158 turbine has the same dimensions and perimeters as the turbines included in the Environmental Assessment (EA) completed for the project.¹⁶ With no turbine location changes, no changes to the turbine model size or perimeters, and previous environmental analysis that considered the potential for 335 MW energy generation at the hybrid project, staff believes that the increase of nameplate capacity from 300 to 311.1 MW will not result in any additional environmental impacts and would have been approved by the Commission at the time of issuance of the original site permit had it been proposed.

Changes in Site Layout

Big Bend's proposed amendment removes two possible turbine locations, adds a collection line easement to avoid crossing a MDNR driveway, and shifts the O&M building location to collocate the building next to the project substation.

With the use of the uprated GE-158 turbine model the Permittee has proposed the removal of two of the potential turbine locations. The EA for the wind, solar, and hybrid project was conducted with the currently permitted turbine layout, and it considered the dimensions of the GE-158 and Vestas V-168 turbine models.¹⁷ The only turbine location changes proposed, are the removal of two permitted turbine locations closest to the Jeffers Petroglyphs. As this removal would minimize potential visual impacts to the users of the Jeffers Petroglyphs, staff does not believe additional environmental analysis is necessary and this would have been approved by the Commission at the time of the original permit issuance.

Big Bend has secured additional land for a collection line easement north of County Road 9, which will allow the collection line to avoid crossing the driveway for the Mountain Lake Wildlife Management Area (WMA). The new collection line easement area was included in the EA completed for the project. Moving the collection line to the north side of County Road 9 will minimize impacts to recreational resources, because the driveway access to the Mountain Lake WMA will not be impacted during construction.¹⁸

Big Bend has requested that the project's permitted O&M building location be moved and collocated with the project's substation. The amended O&M building location will be the same location as the previously reviewed and permitted Red Rock Solar substation. Amending the O&M building location will shift impacts to agricultural land from the originally permitted location to the amended location. Staff believes collocation of the project substation and O&M building would minimize impacts to agricultural

¹⁶ DOC-EERA, *Environmental Assessment (EA) – Summary and Main Document*, January 18, 2022. eDocket No. [20221-181617-03](#), [20221-181617-08](#), [20221-181617-13](#)

¹⁷ DOC-EERA, *Environmental Assessment (EA) – Summary and Main Document*, January 18, 2022. eDocket No. [20221-181617-03](#), [20221-181617-08](#), [20221-181617-13](#)

¹⁸ Big Bend Wind, LLC, 2025 SPAR – Figures, Figure 1, October 31, 2025. eDocket No. [202510-224488-02](#)

operations by creating one developed area to work around versus having to two separate developed areas for farmers to work around.¹⁹

Northern Long-Eared Bat

In the 2025 SPAR, Big Bend states that the northern long-eared bat (*Myotis septentrionalis*) is no longer present in the IPaC results for the project area. Staff believes the assumption that the northern long-eared bat (NLEB) should not be considered as a species that could be impacted by the project is not appropriate or accurate. The IPaC system is currently not to be utilized for the review of solar and wind energy projects, as is stated on the IPaC website. Additionally, the IPaC system results are generally based on anticipated range of occurrence of listed species and users should begin reviewing projects at a county wide level, and more appropriately at a species range level for a mobile species such as the NLEB.

NLEB are known for short migration between winter hibernacula and summer roosting habitat, as well as regular nightly foraging flights. The species' flight activities put the species at potential risk of impact from the project's operation. Additionally, NLEBs utilize a wide variety of trees as potential roosting locations during the spring, summer, and early fall, and although no active roost trees for the species have been identified in the area, that does not imply the species may not utilize trees within or adjacent to the project area. It is also important to note that federally listed species, such as NLEB are listed and protected by the Endangered Species Act (ESA) wherever they are found, so the environmental analysis of potential impacts to rare species should error on the side of broader inclusion for a species known to range throughout Minnesota and into the Dakotas. The U.S. Fish and Wildlife has a specific webpage that shows the range of NLEBs to be considered when planning for wind energy projects.²⁰ Additionally, a GIS data layer of the NLEB wind range can be found here [NLEB Wind Range GIS datalayer | FWS.gov](https://www.fws.gov/library/collections/land-based-wind-energy-voluntary-avoidance-technical-assistance-northern-long).

Staff Comments on Permit Conditions

Staff has reviewed the 2025 SPAR and believes that the proposed changes are generally consistent with the existing permit. In this section, staff provides responds to Big Bend's proposed permit amendments included in 2025 SPAR, Attachment A²¹ and recommends additional amendments.

¹⁹ Big Bend Wind, LLC, 2025 SPAR – Figures, Figure 1, October 31, 2025. eDocket No. [202510-224488-02](https://edocket.access.gpo.gov/2025/202510-224488-02.html)

²⁰ USFWS. Northern long-eared bat (NLEB) Range for Wind Energy Projects.

<https://www.fws.gov/library/collections/land-based-wind-energy-voluntary-avoidance-technical-assistance-northern-long>. Accessed December 4, 2025.

²¹ Big Bend Wind LLC, 2025 SPAR – Attachment A-Draft Site Permit Amendment, October 31, 2025. eDocket No. [202510-224488-03](https://edocket.access.gpo.gov/2025/202510-224488-03.html)

Permittee Proposed Permit Amendments

Big Bend suggested amendments to following sections of the permit to reflect proposed changes to the project;

- Permit Cover
- Section 1 Site Permit
- Section 2 Project Description
- Section 2.1 Associated Facility
- Section 4.9 Wind Turbine Towers
- Section 5.3 Construction and Operation Practices
- Section 5.3.16 Archaeological and Historic Resources
- Section 11.1 Decommissioning Plan

Big Bend suggested amendments to the following sections of the permit to reflect updates for Minn. Stat. § 216l, revisions to remove the Department of Commerce, and/or replace the Department of Commerce with Commission staff;

- Permit Cover
- Section 1 Site Permit
- Section 4.7 Native Prairie
- Section 5.3.16 Archaeological and Historic Resources
- Section 6.2 Independent Third-Party Monitor
- Section 7.4 Noise Studies
- Section 8.2 Power Purchase Agreement
- Section 8.3 Failure to Commence Construction
- Section 10.1 Pre-Construction Meeting
- Section 10.2 Pre-Operation Meeting
- Section 10.3 Site Plan
- Section 10.10 Project Energy Production
- Section 11.1 Decommissioning Plan
- Section 12.1 Final Boundaries
- Section 13 Permit Amendment
- Section 14 Transfer of Permit
- Section 15 Revocation or Suspension of Permit
- Attachment 1 Complaint Handling Procedures
- Attachment 2 Compliance Filing Procedures

Big Bend suggested the addition of the following permit sections;

- Section 5.3.29 Communication Cables
- Section 5.3.30 Bio-netting, Natural Netting, and Mulch Products
- Section 5.3.31 Dust Control
- Section 5.3.32 State Historic Preservation Office Recommendations
- Section 5.3.33 Unanticipated Discoveries Plan

- Section 10.6 Prevailing Wage

Staff is in agreement with Big Bend's proposed permit amendments as they are identified in the 2025 SPAR, Attachment A.²²

EIP Staff Recommended Permit Amendments

In addition to Big Bend's proposed permit amendments, staff recommends amendments to the following sections of the site permit;

- Section 7.5.4 Immediate Incident Reports
- Section 10.3 Site Plan
- Section 10.4 Status Reports

Section 7.5.4 Immediate Incident Reports

Staff recommends modifying the language (additions blue, underlined and deletions green, strikethrough) in the condition to be consistent with recently issued site permits.

7.5.4. Immediate Incident Reports

The Permittee shall notify the Commission, EERA, the USFWS, and the DNR within 24 hours of the discovery of any of the following:

- (a) *five or more dead or injured birds or bats, at an individual turbine location, within a five-day reporting period during a single survey; or*
- (b) *twenty or more dead or injured birds or bats, across the entire facility, within a five-day reporting period during a single survey (potential mass casualty event); or*
- (c) *one or more dead or injured state threatened, endangered, or species of special concern;*
- (d) *one or more dead or injured federally listed species, including species proposed for listing; or*
- (e) *one or more dead or injured bald or golden eagle(s).*

Section 10.3 Site Plan

In addition to technical corrections made by Big Bend (identified in red, strikethrough), staff recommends modifying the language (additions blue, underlined and deletions green, strikethrough) in the condition to be consistent with recently issued site permits.

10.3 Site Plan

At least 30 days prior to the pre-construction meeting, the Permittee shall provide the

²² Big Bend Wind LLC, 2025 SPAR – Attachment A-Draft Site Permit Amendment, October 31, 2025. eDocket No. [202510-224488-03](#)

Commission, ~~the Department~~, and the Cottonwood and Watonwan Counties, Environmental Services and Public Works Departments with a site plan that includes specifications and drawings for site preparation and grading; specifications and locations of all turbines and other structures to be constructed including all electrical equipment, collector and feeder lines, pollution control equipment, fencing, roads, and other associated facilities; and procedures for cleanup and restoration. The documentation shall include maps depicting the site boundary and layout in relation to that approved by this permit. The Permittee shall document, through GIS mapping, compliance with the setbacks and site layout restrictions required by this permit, including compliance with the noise standards pursuant to Minnesota Rules Chapter 7030. At the same time, the Permittee shall notify affected landowners and city and town clerks that the site plan is on file with the Commission and the Cottonwood and Watonwan Counties, Environmental Services and Public Works Departments. The Permittee may submit a site plan and engineering drawings for only a portion of the project if the Permittee intends to commence construction on certain parts of the project before completing the site plan and engineering drawings for other parts of the project.

The Permittee may not commence construction until the earlier of (i) 30 days after the pre-construction meeting has expired (ii) or until the Commission has advised the Permittee in writing that it has completed its review of the documents and determined that the planned construction is consistent with this permit.

If the Commission notifies the Permittee in writing within 30 days after the pre-construction meeting that it has completed its review of the documents and planned construction, and finds that the planned construction is not consistent with this site permit, the Permittee may submit additional and/or revised documentation but may not commence construction until the Commission has notified the Permittee in writing that it has determined that the planned construction is consistent with this site permit.

If the Permittee intends to make any significant changes to its site plan or the specifications and drawings after submission to the Commission, the Permittee shall notify the Commission, ~~the Department~~, the Cottonwood and Watonwan Counties, Environmental Services and Public Works Departments, city and town clerks, and the affected landowners at least five days before implementing the changes. No changes shall be made that would be in violation of any of the terms of this permit.

In the event that previously unidentified human and environmental conditions are discovered during construction that by law or pursuant to conditions outlined in this permit would preclude the use of that site as a turbine site, the Permittee shall have the right to move or relocate turbine site. Under these circumstances, the Permittee shall notify the Commission, ~~the Department~~, the MPCA, the DNR, the Cottonwood and Watonwan Counties, Environmental Services and Public Works Departments, city and town clerks, and the affected landowners of any turbines that are to be relocated, and provide the previously unidentified environmental conditions and how the movement of the turbine mitigates the human and environmental

impact at least five days before implementing the changes. No changes shall be made that would be in violation of any terms of this permit.

Section 10.4 Status Reports

Staff recommends modifying the language (additions blue, underlined) in the condition to be consistent with recently issued site permits.

10.4 Status Reports

The Permittee shall file status reports with the Commission on progress regarding site construction. The Permittee need not report more frequently than monthly. Reports shall begin with the commencement of site construction and continue until completion of restoration. Reports shall describe construction activities and progress and activities undertaken in compliance with this permit. Reports shall include text and photographs.

If the Permittee does not commence construction of the Project within six months of this site permit issuance, the Permittee shall file with the Commission Pre-Construction Status Reports on the anticipated timing of construction every three months beginning with the issuance of this site permit until the pre-construction meeting. The status updates shall include information on the Project's Midcontinent Independent System Operator (MISO) interconnection process, if applicable.

Recommendations on Wind Site Permit Amendment and Conditions

EIP staff has reviewed Big Bend's 2025 SPAR and supporting materials and believes the anticipated environmental and human impacts associated with the proposed turbine technology change and modifications to the site layout are comparable to, or less than, the potential impacts associated with the November 2024 permit.

With respect to amendments to the permit, staff recommends the Commission:

- 1) Adopt Big Bend's amendments as proposed to the following sections:
 - a) Permit Cover
 - b) Section 1 Site Permit
 - c) Section 2 Project Description
 - d) Section 2.1 Associated Facility
 - e) Section 4.7 Native Prairie
 - f) Section 4.9 Wind Turbine Towers
 - g) Section 5.3 Construction and Operation Practices
 - h) Section 5.3.16 Archaeological and Historic Resources
 - i) Section 5.3.29 Communication Cables
 - j) Section 5.3.30 Bio-netting, Natural Netting, and Mulch Products
 - k) Section 5.3.31 Dust Control
 - l) Section 5.3.32 State Historic Preservation Office Recommendations
 - m) Section 5.3.33 Unanticipated Discoveries Plan
 - n) Section 6.2 Independent Third-Party Monitor

- o) Section 7.4 Noise Studies
- p) Section 8.2 Power Purchase Agreement
- q) Section 8.3 Failure to Commence Construction
- r) Section 10.1 Pre-Construction Meeting
- s) Section 10.2 Pre-Operation Meeting
- t) Section 10.6 Prevailing Wage
- u) Section 10.10 Project Energy Production
- v) Section 11.1 Decommissioning Plan
- w) Section 12.1 Final Boundaries
- x) Section 13 Permit Amendment
- y) Section 14 Transfer of Permit
- z) Section 15 Revocation or Suspension of Permit
- aa) Attachment 1 Complaint Handling Procedures
- bb) Attachment 2 Compliance Filing Procedures

2) Adopt Big Bend's proposed amendments with the additional modifications proposed by staff in the following sections:

- a) Section 10.3 Site Plan

3) Adopt staff's proposed amendments to the following sections:

- a) Section 7.5.4 Immediate Incident Reports
- b) Section 10.4 Status Reports