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May 3, 2019

VIA ELECTRONIC FILING

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 East Seventh Place, Suite 350
St. Paul, MN 55101

RE: Reply Comments

In the Matter of the Application of Flying Cow Wind, LLC for a Certificate of Need and Site Permit for the up to 152 MW Bitter Root Wind Project and Associated Facilities in Yellow Medicine County, Minnesota

MPUC Docket Nos. IP-6984/CN-17-676; IP6984/WS-17-749
OAH Docket No. 8-2500-35843

Dear Mr. Wolf:

Renewable Energy Systems Americas Inc. ("RES") submits these brief reply comments regarding the request of Avangrid Renewables, LLC ("Avangrid") to withdraw the applications in the above-referenced dockets. RES believes that the circumstances support approval of the withdrawal without conditions. Flying Cow Wind, LLC ("FCW") is no longer seeking approvals from the Commission for the Bitter Root Wind Project. If Avangrid or FCW seek approvals for the project from the Commission at a future date, any interested parties will be able to participate in that proceeding with the Commission and address any issues that may be relevant to that proceeding at that time.

Similarly, RES no longer has an interest in FCW, and should not be subject to conditions related to the withdrawal. As was noted in Avangrid's April 4, 2019 filing to the Commission, RES and Avangrid entered into an arms-length commercial transaction on March 25, 2019 pursuant to which Avangrid acquired FCW. No binding agreement to sell FCW existed prior to that date, and the Commission was informed of the agreement within a reasonable time. As RES no longer has an interest in FCW, the information requests of the Laborer's District Council of Minnesota and North Dakota ("LDC") are moot. If the information sought by the LDC is relevant to a future matter before the Commission, LDC will have the opportunity to seek the information as a part of that proceeding at that time.

RES appreciates the Commission's attention to this matter. Please feel free to contact me if you have any questions regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michelle Matthews', written in a cursive style.

Michelle Matthews

FOR THE MINNESOTA PUBLIC UTILITIES COMMISSION

121 Seventh Place East Suite 350

St. Paul, Minnesota 55101-2147

*In the Matter of the Application of Flying
Cow Wind, LLC for a Certificate of Need
for the 152 MW Large Wind Energy
Conversion System in Yellow Medicine
County, Minnesota*

*In the Matter of the Application of Flying
Cow Wind, LLC for a Site Permit for the up
to 152 MW Large Wind Energy Conversion
System in Yellow Medicine County,
Minnesota*

OAH Docket No. 8-2500-35843
MN PUC Docket No. IP-6984/CN-17-676
MN PUC Docket No. IP-6984/WS-17-749

CERTIFICATE OF SERVICE

The undersigned hereby certifies that true and correct copies of **Renewable Energy Systems**

Americas Inc. Reply Comments were served today upon the parties of the attached services lists.

Dated this 3rd day of May, 2019

/s/ Tammy J. Krause
Tammy J. Krause

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Thomas	Burman	thomas.burman@stinson.com	Stinson Leonard Street LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Paper Service	Yes	OFF_SL_17-676_Official CC Service List
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_17-676_Official CC Service List
Ian	Dobson	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_17-676_Official CC Service List
Kate	Fairman	kate.frantz@state.mn.us	Department of Natural Resources	Box 32 500 Lafayette Rd St. Paul, MN 551554032	Electronic Service	Yes	OFF_SL_17-676_Official CC Service List
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Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	Yes	OFF_SL_17-676_Official CC Service List
Andrew	Gibbons	andrew.gibbons@stinson.com	Stinson Leonard Street	50 S 6th St Ste 2600 Minneapolis, MN 54002	Electronic Service	Yes	OFF_SL_17-676_Official CC Service List
Kari	Howe	kari.howe@state.mn.us	DEED	332 Minnesota St, #E200 1ST National Bank Bldg St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_17-676_Official CC Service List
Linda	Jensen	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_17-676_Official CC Service List
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Karen	Kromar	karen.kromar@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	Yes	OFF_SL_17-676_Official CC Service List
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	Yes	OFF_SL_17-676_Official CC Service List
Susan	Medhaug	Susan.medhaug@state.mn.us	Department of Commerce	Suite 280, 85 Seventh Place East St. Paul, MN 551012198	Electronic Service	Yes	OFF_SL_17-676_Official CC Service List
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Kevin	Pranis	kpranis@liunagro.com	Laborers' District Council of MN and ND	81 E Little Canada Road St. Paul, Minnesota 55117	Electronic Service	Yes	OFF_SL_17-676_Official CC Service List
Stephan	Roos	stephan.roos@state.mn.us	MN Department of Agriculture	625 Robert St N Saint Paul, MN 55155-2538	Electronic Service	Yes	OFF_SL_17-676_Official CC Service List
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Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources	500 Lafayette Road Box 25 St. Paul, Minnesota 55155-4040	Electronic Service	Yes	OFF_SL_17-676_Official CC Service List
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_17-676_Official CC Service List

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Thomas	Burman	thomas.burman@stinson.com	Stinson Leonard Street LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Paper Service	Yes	OFF_SL_17-749_Official CC Service List
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Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	Yes	OFF_SL_17-749_Official CC Service List
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Anne Marie	Griger	anne-marie.griger@res-group.com	Flying Cow Wind, LLC	11101 W 120th Ave Broomfield, Colorado 80021	Electronic Service	Yes	OFF_SL_17-749_Official CC Service List
Linda	Jensen	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_17-749_Official CC Service List
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	Yes	OFF_SL_17-749_Official CC Service List
Michelle	Matthews	Michelle.Matthews@res-group.com	Renewable Energy Systems	330 2nd Ave S Ste 820 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_17-749_Official CC Service List

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