

September 24, 2020

VIA ELECTRONIC FILING

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place E, Suite 350
St. Paul, MN 55101

Re: *In the Matter of the Site Permit Amendment Application of FPL Energy Mower County Wind, LLC for the Mower County Wind Farm in Mower County, Minnesota, MPUC Docket No. IP6557/WS-06-91*

Request for Minor Amendment to Site Permit

Dear Mr. Seuffert:

Pursuant to Minn. R. 7854.1300 Subp. 2 and Section 13 of FPL Energy Mower County Wind, LLC's ("Mower") August 14, 2020 Site Permit, Mower respectfully requests a minor amendment to its Site Permit. Specifically, Mower requests that the Commission amend its Site Permit to allow Mower to replace the existing 93-meter long blades at Turbine 21 with new blades of the same length. As explained below, there is good cause to grant this amendment.

As part of its partial repowering of the Mower County Wind Project, Mower proposed to replace the existing 93-meter-long turbine blades with blades 108 meters in length. Mower noted, however, that due to the potential impacts to a Mower County maintained microwave beam path, Mower would repower Turbine 21, but without longer blades so to not intrude on Mower County's microwave beam path. Mower stated that only the nacelle, gear box, drive train, and associated parts of Turbine 21 would be repowered. Consistent with Mower's representation, Section 2 ("Project Description") of the Site Permit issued to Mower provides that "the repowering includes (1) replacing the wind turbine blades, increasing the rotor diameter from 93 meters to 108 meters, for all turbines except turbine 21. . ."

Mower has determined that it is necessary to replace the existing blades on Turbine 21 with the new blades of the same length (i.e., 93 meters with the same dimensions) to ensure eligibility for Federal Production Tax Credits ("PTCs") associated with the repowering of the turbine. Because the replacement blades are the same length and dimension, no impacts to the natural or

human environment (*e.g.*, sound or shadow flicker) will result from the change. As such, there is good cause to approve the requested amendment.

To implement the requested amendment, Mower has identified the following minor change to Section 2 of the Site Permit:

2. PROJECT DESCRIPTION

The project is a repowering of the existing Mower County Wind Farm's 43 Siemens wind turbines. The repowering includes (1) replacing the wind turbine blades, increasing the rotor diameter from 93 meters to 108 meters, for all turbines except turbine 21 (which blades will be replaced without increasing existing rotor diameter of 93 meters); (2) replacing equipment within the turbine nacelles; (3) upgrading turbine tower foundations with concrete collars; and (4) installing a lighting mitigation system.

The only other reference to Turbine 21 in the Site Permit is set forth in Section 5.3.17 ("Interference") which provides: "To avoid potential interference with a county-designated microwave beam path, the Permittee shall repower turbine 21 without the installation of larger rotor blades." This statement remains accurate even with the requested amendment as larger rotor blades will not be installed on Turbine 21.

Mower respectfully requests that the Commission expeditiously approve the requested amendment as construction and repowering of the Mower wind turbines is currently underway to achieve commercial operation by the end of the year. Thank you for your attention to this filing. Please do not hesitate to contact me with any questions or concerns.

Respectfully submitted,

/s/ Brian M. Meloy

Brian M. Meloy

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

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**Docket No. IP6557/WS-06-91
CERTIFICATE OF SERVICE**

The undersigned hereby certifies that true and correct copies of **FPL Energy Mower County Wind, LLC's, Request for Minor Amendment to Site Permit** were served today upon the following by electronic service:

NAME	EMAIL
Sarah Beimers	sarah.beimers@state.mn.us
Generic – Commerce Attorneys	commerce.attorneys@ag.state.mn.us
Sharon Ferguson	sharon.ferguson@state.mn.us
Carol Overland	overland@legalelectric.org
Generic – Residential Utilities	residential.utilities@ag.state.mn.us
Will Seuffert	will.seuffert@state.mn.us

Dated this 24th day of September, 2020

/s/ Joshua M. Feit

Joshua M. Feit