

Rose Creek Wind, LLC

MINNESOTA PUBLIC UTILITIES COMMISSION

MPUC DOCKET NO. IP-7065/WS-21-643  
OAH DOCKET NO. 23-2500-38341

DIRECT TESTIMONY OF GOKHAN ANDI

July 20, 2022

**I. INTRODUCTION AND QUALIFICATIONS**

**Q. Please state your name, employer, and business address.**

A. My name is Gokhan Andi. I am employed by ConEdison Clean Energy Business (CEB) and my business address is 4301 W. 57th St., Suite 131 Sioux Falls, SD 57108.

**Q. Please briefly describe your educational and professional background and experience.**

A. I have an undergraduate degree in civil engineering, and a master's degree in construction management. I worked as a city engineer for a municipality from 1998 to 2005. I have been working in the renewable energy project development sector since 2005.

**Q. What is your role with respect to the Project and in this Proceeding?**

A. I am the Manager of Wind Project Development at CEB and I lead the company's development efforts for the Rose Creek Repower Project (the Project). In that role, I am managing and overseeing the development activities including permitting, interconnection, layout, and other aspects of project development.

**Q. Who will construct, own, and operate the Project?**

A. Rose Creek Wind, LLC (Rose Creek), an indirect subsidiary of ConEdison Development, a New York renewable energy development and operations company, will construct, own, and operate the Project.

**II. OVERVIEW**

**Q. What is the purpose of your Direct Testimony?**

A. The purpose of my Direct Testimony is to provide an update on the Project, specifically addressing the following topics: easements and landowner

coordination; identification of the laydown yard site, agency comments; and the draft site permit.

**Q. What schedules are attached to your Direct Testimony?**

A. The following schedules are attached to my Direct Testimony:

- **Schedule A**: Updated Site Permit Application Figures
- **Schedule B**: Photographs of the Night Sky

**Q. Are there any other witnesses providing testimony on behalf of Rose Creek?**

A. Yes. Mr. Dan Flo of Merjent, Inc. is providing information regarding the environmental surveys Rose Creek has completed to date as well as information regarding Rose Creek's evaluation of the potential environmental impacts of the project design changes I discuss in my testimony.

### **III. PROJECT UPDATES**

**Q. Why is Rose Creek proposing to repower the Project?**

A. Rose Creek is planning to repower the Project because of the considerable advancements in wind turbine efficiency that have occurred since the Project was originally constructed. The site has an excellent wind resource, good existing transmission interconnection access, compatible existing land use and environmental features and supportive landowners. Accordingly, Rose Creek is proposing to repower the Project to extend the life of the Project and efficiently produce more renewable energy while utilizing existing interconnection resources.

**Q. What is the expected timeline for Project construction?**

A. Rose Creek anticipates Project construction to begin after receiving all necessary regulatory approvals, which it estimates to be in the second quarter of 2023, and to begin commercial operations in the fourth quarter of 2023.

60  
61 **Q. Have there been any changes in the proposed Project layout since the**  
62 **Application was filed?**

63 A. Yes. There are three changes effecting the overall layout. First, based on  
64 landowner negotiations to date, it has become increasing unlikely that Rose Creek  
65 will be able to obtain sufficient land control to build the Alternative (T1) wind turbine  
66 shown in the Application for Scenario 1. Presuming Rose Creek is unable to  
67 secure the necessary land control, it would not build Alternative T1 and would  
68 instead construct only the six primary turbines reflected in the Application.  
69 Second, Rose Creek has identified an area for the laydown yard and signed an  
70 agreement with the landowner. The laydown yard will be approximately seven  
71 acres of land and located in the Northeast corner of the land described as follows:  
72 The East Half of the Northwest Quarter of Section 16, Township 101 North, Range  
73 16 West, Mower County, Minnesota.  
74 Third, based on the results of its native prairie survey, Rose Creek has decided to  
75 relocate one segment of the planned collection lines to avoid an identified native  
76 prairie community. Mr. Dan Flo provides additional information in his testimony  
77 regarding the findings of the native prairie survey.

78  
79 **Schedule A** provides updated figures showing these changes.  
80

#### 81 **IV. WIND RIGHTS AND EASEMENTS**

82

83 **Q. Has Rose Creek obtained the necessary property rights to construct the**  
84 **Project within the proposed Project site?**

85 A. At the time the Application was filed, Rose Creek had secured 95% of land leases  
86 required to accommodate setback requirements and Project infrastructure. Since  
87 then, Rose Creek has worked with landowners to secure one additional good  
88 neighbor agreement and the agreement for the laydown yard site. Schedule A

includes updated Application Figures 4a and 4b reflecting these additional land rights.

**Q. Are you still negotiating any agreements for the Project?**

A. Yes. We are negotiating one collection line agreement and expect to secure that easement prior to the start of construction.

As noted above, Rose Creek continues to be open to negotiating agreements needed to construct turbine Alternative T1, but if these negotiations are unsuccessful, Rose Creek would not build Alternative T1 and would instead construct only the six primary turbines reflected in the Application.

## **V. RESPONSE TO AGENCY COMMENTS**

**Q. Have you reviewed the comments from the Minnesota Department of Natural Resources (MDNR)? If so, what is your response to the MDNR's comments on the proposed Project?**

A. Yes, we have reviewed the MDNR's comments on May 18, 2022 and agree with the recommendations.

**Q. Have you reviewed the comments from the Minnesota Pollution Control Agency (MPCA)? If so, what is your response to the MPCA's comments?**

A. Yes. We have reviewed the MPCA's comments on June 1, 2022 and agree with the recommendations.

**Q. Have you reviewed the comments from the U.S. Fish and Wildlife Services (USFWS)? If so, what is your response to the USFWS's comments?**

A. Yes. We have reviewed the USFW's comments on February 10, 2022 and June 1, 2022 and agree with the recommendations.

119 **Q. Have you reviewed the comments from the Minnesota Department of**  
120 **Transportation (MNDOT)? If so, what is your response to the MNDOT**  
121 **comments?**

122 A. Yes. We have reviewed the MNDOT's comments on May 19, 2022 and agree with  
123 the recommendations.

124

125 **Q. Have you reviewed the comments from the Minnesota State Historic**  
126 **Preservation Office (SHPO)? If so, what is your response to the SHPO**  
127 **comments?**

128 A. Yes. We have reviewed the SHPO's comments on May 18, 2022 and agree with  
129 the recommendations.

130

131 **Q. Have you reviewed the comments from the Minnesota Department of**  
132 **Commerce, Energy Environmental Review and Analysis (EERA)? If so, what**  
133 **is your response to the EERA comments?**

134 A. Yes. We have reviewed the EERA's comments on February 18, 2022 and agree  
135 with the recommendations, with two exceptions related to the draft site permit,  
136 which I discuss below.

137

138 **VI. DRAFT SITE PERMIT**

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140 **Q. Have you reviewed the Draft Site Permit issued for the Project on March 17,**  
141 **2022?**

142 A. Yes.

143

144 **Q. Do you have any comments concerning the Draft Site Permit?**

145 A. Yes. Rose Creek largely agrees that the Draft Site Permit contains reasonable  
146 and appropriate conditions related to construction and operation of the Project.  
147 However, we recommend two minor corrections to Section 2.1. Additionally, we

have significant concerns regarding the language contained in Special Condition 5.3.28 (Federal Aviation Administration Lighting) and Special Condition 6.1 (Decommissioning of the Existing Rose Wind Facility).

**Q. What corrections are needed in Section 2.1?**

A. Section 2.1 describes the short transmission line needed to interconnect the Project substation to the point of interconnection. This line is approximately 65 feet in length and is a 69 kV line, rather than a 34.5 kV line, as stated in the Draft Site Permit.

**Q. What are your concerns regarding Special Condition 5.3.28 (Federal Aviation Administration Lighting)?**

A. As discussed in the Application, Rose Creek does not plan to install an Aircraft Detection Lighting System (ADLS) on this Project because to do so imposes a significant financial burden for a project of this size.

**Q. Have you investigated the cost of installing ADLS on the Project?**

A. Yes. Since filing the Application, Rose Creek has received two quotes from ADLS vendors for ADLS equipment that would be needed at the site and one quote for installation of the equipment. We have also obtained an estimate of ongoing operational costs for the ADLS system.

**Q. What equipment and services are required to install and operate ADLS for the Project?**

Both equipment proposals required installation of one radar sensor system and one radar tower. Related equipment included a light control server (LCS) and an outdoor equipment cabinet.

Equipment and crane rental and tower steel package and freight (foundation materials) would be required for installation.

**[NONPUBLIC DATA HAS BEEN EXCISED...**

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179 **Q. What are the estimated costs to install ADLS at Rose Creek?**

180 A. Based on vendor estimates, ADLS equipment costs at Rose Creek would be  
181 approximately [REDACTED]

182 [REDACTED]. In addition, installation costs are estimated to add any additional

183 [REDACTED] Once

184 ADLS is installed, there is an additional operational cost of approximately

185 [REDACTED] per year,

186 or approximately [REDACTED]

187 [REDACTED] over the life of the Project.

**...NONPUBLIC DATA HAS BEEN EXCISED]**

188

189 **Q. How do these cost estimates compare to the overall cost of the Project?**

190 A. The capital expenditure for the Project is estimated to be \$24 to 36 million. This  
191 includes all costs of development, design, and construction. Ongoing O&M costs  
192 and administrative costs are estimated to be approximately \$700,000 to \$1.2  
193 million per year, including landowner land lease and easement payments.

194

195 Based on the vendor estimates for equipment and operational costs, the cost of  
196 the ADLS would be approximately 3-4% percent of the total development costs of  
197 the Project.

198

199 **Q. Can a project of this size sustain the addition cost for ADLS?**

200 A. No, the cost of the ADLS is a significant financial burden for the Project that was  
201 not accounted for in the financial model. If the Commission were to require ADLS,  
202 Rose Creek would likely need to seek an increase in the contracted price of power  
203 produced by the Project.

204

205 **Q. Do you have any other concerns regarding installation of ADLS?**

206 A. Yes. As I have discussed, installation of ADLS will require construction of an  
207 additional radar tower. This must be sited on land subject to a voluntary easement

and be located at a location that supports proper functioning of the ADLS. Rose Creek does not currently have appropriate land rights to site the radar facility.

**Q. In your opinion, will ADLS reduce visual impacts of the Project?**

A. I believe ADLS would have limited impact on the visual impacts of the Project. It is important to note that repowering the current 11 Rose Wind turbines with the proposed up to 7 Rose Creek wind turbines will already reduce the number of operating Federal Aviation Administration (FAA) lights in the area. That said, there are still hundreds of FAA lights visible from this site due to existing surrounding wind farms. **Schedule B** includes photographs of the night sky from several locations within the Rose Creek Project Area. As shown in these photographs, eliminating FAA lights on up to seven turbines will have limited impact on the night sky.

**Q. What are your concerns regarding Special Condition 6.1 (Decommissioning of the Existing Rose Wind Facility)?**

A. First, decommissioning of the existing Rose Wind Facility is beyond the scope of this proceeding since that project was constructed and operated pursuant to conditional use permits issued by Mower County. Rose Wind must comply with the requirements of Mower County and those conditional use permits when decommissioning those turbines. Accordingly, permit language including that requirement is unnecessary.

More concerning, however, is the language in Special Condition 6.1 that states that decommissioning of the existing Rose Wind Facility “must be completed prior to beginning construction of the Rose Wind Project authorized by this permit.”

**Q. Why is the timing element of Condition 6.1 a concern?**

A. It is critical to the overall economics of the project that the period of time in which no renewable energy is being produced is as short as possible. Rose Wind and

Rose Creek both use the same interconnection facilities, so it is physically impossible for both projects to operate simultaneously. However, it is likely that the decommissioning activities and construction activities will overlap to minimize downtime, efficiently utilized labor and equipment at the site, and ensure that Rose Creek can begin producing renewable energy as soon as practicable.

For example, the current decommissioning and construction schedule assumes, first, the substation, overhead transmission line, and collection system will be safely decommissioned while the existing wind turbines are disassembled. Shortly thereafter, the new substation will be installed. The new turbine foundations will be excavated at the same time that the existing turbine foundations are removed, and then the new access roads and collection lines will be installed.

As Rose Creek understands the language currently contained in the Draft Site Permit, decommissioning activities would have to be complete before construction of Rose Creek could begin. This sequential staging of activities lengthens the time that no renewable energy is produced on site. It will also make construction activities less efficient and more impactful, as crews will have to mobilize and demobilize rather than move between decommissioning and construction as otherwise planned.

**Q. How would you propose to amend the Draft Site Permit to address this issue?**

A. Rose Creek proposes deleting the second paragraph in Condition 6.1 to eliminate the timing restriction on construction activity.

**Q. Do you have any additional recommendations regarding the Draft Site Permit?**

A. Yes. As noted above, Rose Creek has now identified, secured land rights, and evaluated a site for the construction laydown yard. Accordingly, Rose Creek

268 requests that this associated facility be included in the final site permit issued for  
269 the Project.

270

271 **VII. CONCLUSION**

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273 **Q. Based on the testimony you have presented today, what are some of the**  
274 **conclusions Rose Creek has reached regarding the proposed Project?**

275 A. Rose Creek has sited the Project to comply with applicable MPUC siting  
276 requirements, as well as to minimize potential impacts to existing land uses,  
277 cultural resources, natural resources, and existing infrastructure. The Project also  
278 has strong landowner and community support and will provide significant benefits  
279 to the local community and the state. Therefore, Rose Creek respectfully requests  
280 that the Commission issue a Large Wind Energy Conversion System Site Permit  
281 for the Project.

282

283 **Q. Does this conclude your Direct Testimony?**

284 A. Yes.

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