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**Tricia DeBleekere**  
 Minnesota Public Utilities Commission  
 121 7<sup>th</sup> Place E, Ste. 350  
 St. Paul, MN 55101  
 (Via E-Filing)

Aurora Distributed Solar Project  
 Docket # IP6928/GS-14-515  
 Information Request Responses

Mrs. DeBleekere,

Aurora Distributed Solar, LLC (Aurora) respectfully submits the below responses as requested by the Minnesota Public Utilities Commission (the “Commission”) on May 1, 2017.

1. Update the information listed below with any changes that have occurred to the expected or actual COD:

- The table below provides the dates for Aurora facilities which have achieved commercial operation. To date, thirteen (13) of the sixteen (16) have achieved commercial operation.

**Table 1. Updated COD of Each Aurora Project Site from March 8, 2017 Update**

Site	Anticipated COD <sup>1</sup>	3/8/2017 Update <sup>2</sup>	Final COD Date <sup>3</sup>
1. Albany	12/17/2016	4/4/2017	25-Apr-17
2. Annandale	1/20/2017	3/21/2017	26-Apr-17
3. Atwater	12/11/2017	3/30/2017	27-Apr-17
4. Chisago	11/10/2016	Online 12/27/2016	23-Dec-16
5. Dodge Center	12/1/2016	3/18/2017	02-May-17
6. Eastwood	12/28/2016	4/5/2017	02-May-17
7. Hastings	12/10/2016	4/10/2017	02-May-17
8. Lake Emily	TBD	Online: 3/27/2017	26-Apr-17
9. Lake Pulaski	TBD	Online: 3/21/2017	26-Apr-17
10. Lawrence Creek	11/21/2016	3/14/2017	28-Mar-17
11. Montrose	12/8/2016	4/4/2017	25-Apr-17

<sup>1</sup> Anticipated Commercial Operation Date (COD) based on contractor provided schedule

<sup>2</sup> Updated COD based on date of site energization and independent engineer certification

<sup>3</sup> Final COD based on date of issuance of acceptance letter by the utility.



12. Paynesville	TBD	6/17/2017	TBD
13. Pine Island	12/16/2016	3/28/2017	9-May-17
14. Waseca	TBD	6/17/2017	TBD
15. West Faribault	12/28/2016	4/5/2017	01-May-17
16. West Waconia	12/28/2016	6/9/2017	TBD

2. Aurora states in its March 8, 2017 Project Status Supplemental Information filing that “At Aurora’s request, Barr has increased the number of environmental compliance personnel monitoring the Project so that, on average, approximately one Barr staff person will be at each facility when construction activities are occurring at the particular facility.”

The Commission requests a more detailed explanation of the level of inspection anticipated at each site per day. From the status reports, it appears that many sites are actively under construction (potentially up to 15) and staff understands there are now six inspectors and the environmental inspector manager. Please clarify the number of environmental inspectors in active status, both the minimum and maximum number that could be working at any given time. Describe how the inspectors are assigned both to site location as well as inspection responsibilities per site.

Provide detailed information on when those inspectors will terminate their work, if there will or has been a step down on the number of inspectors, and what factors it will depend on (site establishment, construction progress, etc.)

- As noted above, 13 of the 16 sites have achieved commercial operation. The presence of environmental inspection personnel onsite at any given time is dependent on the nature of the work being performed. Barr initially assigned a full-time project manager as the lead Environmental Inspector (EI). The EI has been actively involved in the project planning and has been regularly updated on scheduling of the various activities based on input from Aurora’s construction contractors in order to assess the appropriate level of environmental oversight.

As activities onsite resumed in 2017, the initial level of support noted in Aurora’s March 8 letter was conservative based on the plan and schedule provided by Aurora’s contractor to achieve commercial operation at the remaining 15 sites. Based on the contractor’s assessment of the level of completion of the various sites prior to re-mobilization, it was deemed by Aurora with concurrence with Barr to assign environmental inspectors to specific sites as required and determined by the EI and Aurora HSE lead (i.e., primarily Waseca, West Waconia and Paynesville, which are the three sites that have yet to reach commercial operation). Based on the nature of the work planned at the remaining sites, additional environmental inspectors have been present to oversee activities at Waseca, West Waconia and Paynesville. Aurora will continue to require the presence of the environmental inspectors until those three sites are ready for final seeding/stabilization. Aside from corrective work, maintenance and restoration activities, most soil disturbance activities are completed at the other thirteen sites such that continuous environmental inspections are not necessary to adequately monitor the conditions of the sites. It



should be noted, regardless of the level of activity at any of the sixteen sites, Aurora continues to conduct Stormwater Pollution Prevention Plan (SWPPP) inspections in accordance with the National Pollution Discharge Elimination System (NPDES) permit standards until the criteria are met to submit the Notice of Termination (NOT) and the NOT is accepted by the MN Pollution Control Agency (MPCA) for each site. For reference, the environmental inspection staffing assignments for the first two weeks of May are included as Attachment 1. Restoration activities are ongoing and no NOT has been filed for any site as of the date of this filing.

3. The Commission understands that Aurora has been requested by the DOC EERA to file weekly project updates on Tuesday of each week summarizing the work conducted the previous week on each project site. Commission staff requests this update report is filed weekly, in eDockets on Tuesdays moving forward.

It is Commission staff's understanding that the weekly reports due 4/18 and 4/25 have not been submitted; staff requests that the two back reports be filed by close of business on 5/2 with the current week report.

- Aurora has submitted the weekly construction updates for due 4/18 and 4/25 to the project docket as requested (eDocket ID's 20175-131550-01 & 20175-131550-02 respectively). With the permission of the PUC and EEA, Aurora respectfully requests that future weekly reports be submitted on Thursday in order to better respond and address any critical issues noted on the independent inspection reports.

4. The Commission requests that the weekly project update summary (beginning 5/9) include information for each site, reported by site, responding to each current and on-going issue raised by the Agricultural Inspector. Each weekly report should address the issues raised by the Agricultural Inspector (e.g. damaged drain tile, compaction, erosion, soil-segregation, trash), specifically how each issue are is being rectified, addressed, and/or corrected moving forward. The report should be cumulative in nature and should include information from the previous week's report in each subsequent report (to show progress).

- Aurora is currently working with Barr and the Agricultural Inspector to update the agricultural inspection issue tracker with appropriate follow-up responses and will provide an updated tracker with the weekly construction update that will be filed on May 25, 2017.

5. The Commission requests that Aurora submit any inspector findings of non-compliance or of unauthorized work at a project site in its weekly status report and report how the matter is being addressed and will be addressed in an on-going manner.

- As requested, Aurora will include inspector findings of non-compliance in the future weekly reports. It should be noted that Aurora actively updates the third party inspector of the compliance status of the project and any prior instances of noncompliance have been documented in the Ag Inspection reports.



The MPCA conducted a routine inspection of SWPPP best management practices at the Lake Pulaski site on April 27, 2017 and sent a follow-up e-mail to Aurora on May 3, 2017. The MPCA noted best management practices that required Aurora's attention. Aurora is addressing the concerns of the MPCA in the timelines requested and has been providing evidence of the same to the MPCA in accordance with its request.

6. In light of the environmental and weather conditions encountered at the sites in 2016, the Commission requests Enel GP's assessment of the adequacy of the Agricultural Mitigation Plan (AIMP) and Vegetation Management Plan (VMP) filed on March 17, 2016, to fulfill its purpose.

- Aurora appreciates the opportunity to provide the Commission this assessment given some of the challenges encountered in the past year. Although much of the work is substantially complete at many of the sites, some of the major components of the AIMP/VMP are still in process, including drain tile repair, decompaction and final seeding and stabilization. Given the complexity of the project and the wide variety of conditions at the sixteen locations, Aurora feels that it may be premature to provide this assessment at this time and respectfully requests a 30-day extension to provide the Commission with its assessment of the adequacy of the AIMP/VMP. We also understand that the AIMP/VMP created for the Aurora project is one of first-impression for the Commission and more generally for the State of Minnesota and we believe it would be helpful to have a collaborative dialogue to discuss the portions of AIMP/VMP that worked well during the Aurora project and other aspects that may deserve changes for future solar projects in Minnesota.

Please feel free to contact me with any questions or comments.

Sincerely,

/s Hans van Lingen

**Hans van Lingen**  
HSEQ Manager, North America-  
Construction  
Health, Safety, Environment & Quality  
Enel Green Power North America, Inc.

	Days?	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
<b>Site Monitors</b>								
Brian Burgner	1					Eastwood		
Brad Warm	3	W. Waconia	W. Waconia	W. Waconia				
David Haar	2				W. Waconia	W. Waconia		
Charlie Hinds	Sub-only							
Dan Caron	3	Waseca	Waseca	Waseca				
Kim Johannessen								
<del>Karen Wold</del>	0							
Heather Wendel	2				Waseca	Waseca		
Terri Toms	2			Paynesville / Lake Pulaski	Lake Pulaski	Lake Pulaski		
<b>SWPPP Inspectors</b>								
Kim Johannessen			purple sites	green sites				
John Warner			yellow sites					
Eric Fitzgerald			orange sites					
Charlie Hinds								
<b>Ag Monitor / Environmental Monitor</b>								
Jacob Thompson			Albany Annandale	Lake Pulaski West Waconia	Waseca Lake Pulaski	Eastwood		
Mandy Bohnenblust		<b>Needs safety training</b>						
Terri Toms								

purple sites	albany, paynesville, atwater, montrose
green sites	annandale, lake pulaski, chisago, lawrence creek
yellow sites	hastings, west faribault, dodge center, pine island
orange sites	west waconia, lake emily, eastwood, waseca

	Days?	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
<b>Site Monitors</b>								
Brian Burgner	1	Eastwood						
Brad Warm	2			W. Waconia	W. Waconia	vacation	vacation	vacation
David Haar	0							
<del>Charlie Hinds</del>	<del>Sub-only</del>							
Dan Caron	3			Waseca	Waseca	Waseca		
Kim Johannessen								
<del>Karen Wold</del>	0							
Heather Wendel	0	off this week						
Terri Toms	4		Paynesville/ Lake Pulaski	Paynesville/ Lake Pulaski	Paynesville/ Lake Pulaski	Paynesville/ Lake Pulaski		
<b>SWPPP Inspectors</b>								
Kim Johannessen			purple sites	green sites				
John Warner			yellow sites					
Eric Fitzgerald			orange sites					
<b>Ag Monitor / Environmental Monitor</b>								
Jacob Thompson		Eastwood restoration city hall mtg	pending	Eastwood TEP	pending			
Mandy Bohnenblust		<del>Needs safety training</del>						
Terri Toms								

purple sites	albany, paynesville, atwater, montrose
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