

April 25, 2018

Daniel P. Wolf, Executive Secretary Minnesota Public Utilities Commission 127 7th Place East, Suite 350 St. Paul, MN 55101-2147

Re: Application for Site Permit Repowering

Lake Benton Wind Project in Lincoln County Docket No. IP-6908/WS-13-294

Dear Mr. Wolf:

Attached are the comments of the Minnesota Department of Commerce Energy Environmental Review and Analysis (EERA) staff on Permit Amendment approval in the following matter:

The Application of Lake Benton Power Partners LLC for a Large Wind Energy Conversation System Site Permit Amendment for Repowering the existing 107.25 MW Lake Benton Wind Project in Lincoln County

Lake Benton Power Partners LLC has submitted a Site Permit Amendment Application pursuant to Minnesota Rule 7854.1300 to retrofit the existing Lake Benton Wind Project and repower the Project as a 107.25 MW LWECS.

This filing was made on February 9, 2018, by:

Dave Leveille Vice President, Operations & Customer Excellence 30 West Superior Street Duluth, MN 55802

EERA submits that a repowering "retrofit" of the Lake Benton Wind Project is in the best interest of the state, as per legislative and Commission policy, will increase energy production by approximately eight percent. Additionally, EERA believes granting the requested exemptions from the Commission's current setback standard are justified and reasonable in this docket, as this was the first wind project permitted by the state and there have been changes to setback requirements since 1995.

In closing, it should be noted that: 1) this project has created 12 to 14 full time jobs and will continue to support those jobs; 2) there is strong community support for continued operation of the project; 3) the project has paid more than four million dollars to the three hosting townships and Lincoln County since constructed in 1995 and will continue to pay a production tax, and; 4) the project is free of complaints from landowners and the public, while maintaining a good operational history.

EERA staff is available to answer any questions the Commission may have.

Sincerely,

/s/ Larry B. Hartman

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