

July 22, 2019

Dan Wolf Executive
Secretary Public Utilities Commission
121 – 7th Place East, Suite 350 St. Paul, MN 55101

Dockets 17-410 and 17-322
Comment Period

Should the Minnesota Public Utilities Commission (Commission) authorize a transfer of the site permit to Northern States Power Company, a Minnesota Corporation (Xcel Energy) pursuant to Minn. R. 7854.1400 and Section 14 of the Site Permit?

NO.

Should the Commission authorize a transfer of the route permit to Xcel Energy pursuant to Minn. R. 7850.5000 and Section 11 of the Route Permit?

NO.

Xcel Energy Company alludes to partially veiled plans (confidential proprietary trade secrets applying) of scaling 32 turbines to be larger in the Freeborn Wind Project. In other words – not the same project permitted to Invenergy in 17-410.

- 1.) The corporate and MN State entities involved in this proposed new permit transfer can avoid harm to Minnesotans and legal liability by requiring new noise modeling before transfer of any site permit.
- 2.) The permitted turbines already cannot meet the state audible noise standard. These louder turbines proposed by Xcel will also violate that state noise standard, only more. Why permit a project which the Commission knows will result in the same noise torture and forced home buy-outs as in Alliant's Bent Tree wind – also in Freeborn County?
- 3.) Sufficient land to build the collection lines is unavailable. A deliverable, vetted, full-package project is the only one that deserves a state permit from Minnesota government. Anything else is shoddy work by first, the applicant- owner; secondly, the State Public Utilities Commission; thirdly, Minnesota State agencies.
- 4.) No decommissioning plan has been presented or is visible for this project, and now these new proposed changes. Decommissioning plan is a legal requirement for a complete permit. The pre-construction meeting is not the permit.
- 5.) NO public comment has been taken on decommissioning specific to Freeborn Wind Project, Xcel Energy owned.
- 6.) It is important to mention that it is becoming clear that Minnesota Regulatory decision-making power (the Commission), multiple State Agencies, and the Applicants

(Invenergy; Xcel Energy) are oblivious to, nor care about, the degree of OUTRAGE on the part of rural Minnesota in regards to all that surrounds Freeborn Wind Project and other Minnesota Wind Permitting dockets. **This is regulatory capture; corporate wind do as you please. It is regulatory that is legally insufficient by the minimal laws and rules we do have.**

The statement, "We have a problem, Houston," in no small way indicates the level of serious failure.

Growing numbers of Minnesotans are aware of the historic bad track and bad actions in the permitting process with Freeborn Wind project and a long list of other LWECS projects in rural Minnesota:

This history involves lack of informing the public of comment opportunities. **This is unlawful.**

There is a blocking or ignoring of public comment. **Unlawful.**

Multiple agencies are advocating for corporate interests with the thinnest covering of political smoke. Vetting of applicant land acquisition and contract verification is lacking.

Disgraceful, deplorable, and unethical.

There is a neglect of proper environmental vetting with existing rules. **Unlawful.**

Homes are consistently and egregiously being left off of maps; no decommissioning plans as required by law, and more.

A pattern can be determined as willful and unlawful.

There is a stubborn refusal by Regulatory and Agency entities to recognize and enter into any rulemaking where discovery of new information and studies on ever larger wind systems can be examined and addressed to protect human health and property rights of all Minnesotans.

Disgraceful and a failure to ethically fulfill purpose and mission as intended – to serve all the people in their homes and chosen business in the State of Minnesota.

Is this the same wind project now? Looks like a new application or amended application is in order. Or new docket numbers needed.

Respectfully submitted on behalf of all rural Minnesota communities who experience wind development as it is now, or have yet to experience its destructive force.

Marie McNamara
Belle Creek Township – Goodhue County, Minnesota