

July 22, 2019

Dan Wolf  
Executive Secretary  
Public Utility Commission  
121 7th Place East, Suite 530  
St. Paul, MN 55101

Dear Mr. Wolf and Commissioners,

I am writing to urge you to table consideration of the transfer of the Freeborn Wind Farm permit to Xcel Energy. Recent changes to the project, both realized and proposed, deserve review and attention before the approval of the transfer. In doing so, the Commission will have taken the time to adequately review if Xcel has met all the standards for taking over ownership of this project.

Issues of particular importance to many in the project area include the recent termination of contracts, proposed increases in the size of the turbines used in the project, and continued use of incomplete and inaccurate maps in project presentations and permitting.

The termination of contract and leases means that the project now will be built on 25% less land and continues to raise questions about the placement of turbines and transmission apparatus. The applicant has always maintained that the configuration of the project cannot be altered in any way because of pressing land needs. Now, late in the process, the applicant has eliminated a quarter of its participant land and still maintains the project can move forward. These facts raise serious questions about the honesty of the applicant to the community and the Commission. The Commission should take the time to ensure that the project could be built on the land that the applicant now has secured through agreements and leases it.

The land issue is of even greater importance with the announcement the Xcel plans on modifying the design of the project to include larger turbines. The decision by Xcel to modify the project to include different turbines that are larger deserve increased scrutiny. The applicant should provide the new proposed layout, which has been reported to the community as possibly changing the location of the turbines by over 100 feet. Then, the applicant should provide evidence that the new layout will comply with regulations on setbacks and noise and not exceed the recommended levels of shadow flicker.

Finally, the applicant should submit updated project plans that accurately depict the project's new design and the actual placement of residences and landowners in the project area. As mentioned in my previous letter, both Freeborn Wind and Xcel continue to use maps that represent the project area inaccurately, including the omission of the home in

which my family and I reside. This issue has been continuously raised by my family to the applicants and the Commission with no regard. The noticeable disregard for this issue overly concerns my family as our residence will be dramatically impacted by up to seven turbines. These turbines have a high probability of generating noise levels that are right at or exceed limits established by state statute.

Many of the issues I have raised are concerns that have been brought up in other filings with the Commission. I ask that the Commissioners review the motion filed by AFCL (Docket 17-410; Document 20197-155472-01) and many of the other letters submitted by my concerned neighbors. Taking action now is vital. Members of this Commission have openly stated that preemptive practices are preferable to reactive measures. It should be the responsibility of the applicant to show that their project, with their desired changes, can comply with state law before having the permit transferred to them. The burden shouldn't fall on private citizens to protect their well-being. I hope that the Commission takes seriously the arguments raised in this letter and others from affected landowners and tables the consideration of the transfer until the proposed changes have been submitted, with proper evidentiary support to demonstrate compliance, and has been reviewed and approved.

Sincerely,

Sean Gaston