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Xcel Energy	Information Request No.	1
Docket No.:	IP-6985/WS-17-700	
Response To:	Minnesota Public Utilities Commission	
Requestor:	Tricia DeBleeckere	
Date Received:	September 5, 2019	

Question:

Provide justification as to why Xcel has requested modification to the permitted site boundary (an expansion of 10,000 acres); including but not limited to justification of areas of expansion of the site boundary. Please provide more information or additional justification beyond what was provided in Xcel's June Amendment Petition and its August 13, 2019 comments.

Staff understands Xcel modified the boundary for two reasons, first, to decrease the overlap of BS1 and BS2 project sites, however the new boundary in several areas appears to increase the overlap, and the overall overlap seems to have increased. Second, the modification was to delineate where there were additional signed participants – however the new boundary doesn't appear to follow the boundary lines of new or existing participants (Reply Comments, Att D).

Response:

As is noted in the Company's Permit Amendment Application and Reply Comments, the intent of the modified project boundary is to reduce overlap between Phase 1 and Phase 2 of the Blazing Star Wind Farm project, and to follow boundary lines of participating parcels signed after the Site Permit was approved in 2018. We appreciate staff's note, however, that the proposed boundary results in increased overlap with the Blazing Star 1 project area in certain areas and does not closely track with participating parcels in others. Based on this comment, we closely reviewed the proposed project boundary and we believe it can be further refined to align with our intent in modifying it. Attachment A to this response shows the Company's updated requested permit boundary, which reduces the overlap with the Blazing Star 1 project area to the minimum necessary, and elsewhere adjusts the boundary to more closely track participating parcels and the overall project area required for construction of the Blazing Star 2 Wind Farm. The result of these adjustments is a reduction in the total project area for Blazing Star 2 from the originally-permitted acreage of 57,800 to an amended 54,825 acres. These boundary changes result in a net reduction of the

project boundary. Importantly, the new boundary (1) still allows for the construction and operation of the Blazing Star 2 Wind Farm as proposed in the Company's June 19, 2019, Permit Amendment Application, and (2) is entirely within the area of the project boundary proposed in the June 19, 2019, Permit Amendment Application, meaning that no additional studies are required for the new boundary.

We will submit a supplement to the Permit Amendment Application reflecting this proposed change to the project boundary.

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