

November 9, 2020

## **VIA ELECTRONIC FILING**

Mr. William Seuffert Executive Secretary Minnesota Public Utilities Commission 121 Seventh Place East, Suite 350 St. Paul, MN 55101-2147

Re: In the Matter of the Application of Big Bend Wind, LLC for a Certificate of Need for the up to 308-MW Big Bend Wind Project in Cottonwood and Watonwan Counties

MPUC Docket No. IP-7013/CN-19-408

In the Matter of the Application of Red Rock Solar, LLC for a Certificate of Need for the up to 60-MW Red Rock Solar Project in Cottonwood County MPUC Docket No. IP-7014/CN-19-486

In the Matter of the Application of Big Bend Wind, LLC for a Large Wind Energy Conversion System Site Permit for the up to 308-MW Big Bend Wind Project in Cottonwood and Watonwan Counties MPUC Docket No. IP-7013/WS-19-619

In the Matter of the Application of Red Rock Solar, LLC for a Site Permit for the up to 60-MW Red Rock Solar Project in Cottonwood County MPUC Docket No. IP-7014/GS-19-620

In the Matter of the Application of Big Bend Wind, LLC for a Route Permit for a 161-kV High Voltage Transmission Line in Cottonwood, Watonwan and Martin Counties

MPUC Docket No. IP-7013/TL-19-621

Dear Mr. Seuffert:

Big Bend Wind, LLC ("Big Bend") and Red Rock Solar, LLC ("Red Rock") (collectively, "the Applicants"), are indirect wholly-owned subsidiaries of Apex Clean Energy Holdings, LLC and are proposing to construct up to 335 megawatts ("MW") of new renewable energy generation. As proposed, the renewable generation could consist of up to 308 MWs of wind (the "Wind Farm"), or a combination of wind and up to 60 MW of solar (the "Solar Project"). In addition, Big Bend is proposing to construct a 161 kilovolt ("kV") transmission line and associated facilities to support the Wind Farm and Solar Project.

Enclosed for filing in each of the respective dockets identified herein, please find:

- 1. Application of Big Bend Wind, LLC for a Certificate of Need for the up to 308-MW Big Bend Wind Project in Cottonwood and Watonwan Counties (MPUC Docket No. IP 7013/CN 19 408), including:
  - a. Summary of Filing;
  - b. Figures; and,
  - c. Appendix A. In accordance with Minnesota Rules, part 7829.0500, and Minn. Stat. Ch. 13, the Applicant has designated as **NONPUBLIC** certain commercially sensitive trade secret information related to the cost of the Project included in the **NONPUBLIC** version of Appendix A, which, if released, would have a detrimental effect on the Applicant by providing potential competitors, commercial parties and others with valuable information not otherwise readily ascertainable and from which these persons would obtain economic value.
- 2. Application of Big Bend Wind, LLC for a Large Wind Energy Conversion System Site Permit for the up to 308-MW Big Bend Wind Project in Cottonwood and Watonwan Counties (MPUC Docket No. IP 7013/WS 19 619), including:
  - a. Figures; and,
  - b. Appendices A-J. In accordance with Minnesota Rules, part 7829.0500, and Minn. Stat. Ch. 13, the Applicant has designated as trade secret certain commercially sensitive information, i.e., certain wind turbine sound power levels, which are considered confidential and proprietary information, included with the **NONPUBLIC** Appendix B of the Site Permit Application. Release of this data would have a detrimental effect on the Applicant and its potential turbine suppliers by providing potential competitors and others with valuable information not otherwise readily ascertainable and from which these persons would obtain economic value. Given the need to include nonpublic information, the Applicant has prepared and is e-filing both NON-PUBLIC AND TRADE SECRET and public versions of Appendix B of the Site Permit Application. The Applicant has also designated as NONPUBLIC Appendix F of the Site Permit Application because it contains sensitive cultural and environmental information. Because Appendix F is nonpublic in its entirety, the Applicant is filing only a cover page as the public version of Appendix F.

- 3. Application of Big Bend Wind, LLC for a Route Permit for a 161-kV High Voltage Transmission Line in Cottonwood, Watonwan and Martin Counties (MPUC Docket No. IP 7013/TL 19 621), including:
  - a. Figures; and,
  - b. Appendices A-H.
- 4. Application of Red Rock Solar, LLC for a Certificate of Need for the up to 60-MW Red Rock Solar Project in Cottonwood County (MPUC Docket No. IP 7014/CN 19 486), including:
  - a. Summary of Filing;
  - b. Figures; and,
  - c. Appendix A. In accordance with Minnesota Rules, part 7829.0500, and Minn. Stat. Ch. 13, the Applicant has designated as **NONPUBLIC** certain commercially sensitive trade secret information related to the cost of the Project included in the **NONPUBLIC** version of Appendix A, which, if released, would have a detrimental effect on the Applicant by providing potential competitors, commercial parties and others with valuable information not otherwise readily ascertainable and from which these persons would obtain economic value.
- 5. Application of Red Rock Solar, LLC for a Site Permit for the up to 60-MW Red Rock Solar Project in Cottonwood County (MPUC Docket No. IP 7014/GS 19 620), including:
  - a. Figures; and,
  - b. Appendices A-F. In accordance with Minnesota Rules, part 7829.0500, and Minn. Stat. Ch. 13, the Applicant has designated as **NONPUBLIC** Appendix E of the Site Permit Application because it contains sensitive cultural and environmental information. Because Appendix E is nonpublic in its entirety, the Applicant is filing only a cover page as the public version of Appendix E.
- 6. Certificate of Service.

The documents referenced above have also been e-filed today through <a href="https://www.edockets.state.mn.us">www.edockets.state.mn.us</a>. Application filing fees were previously sent under separate cover.

Mr. William Seuffert November 9, 2020 Page 4

A copy of this filing is also being served upon the persons on the Official Service Lists of record and the general service lists, as applicable. Please add the following individuals to the Official Service Lists of record for electronic service only:

Christina K. Brusven
Fredrikson & Byron, P.A.
200 South Sixth Street, Suite 4000
Minneapolis, MN 55402
(612) 492-7000
cbrusven@fredlaw.com

Brenna Gunderson Apex Clean Energy Director of Project Development 8665 Hudson Blvd. North, Suite 110 Lake Elmo, MN 55042 (434) 326-2929 Brenna.gunderson@apexcleanenergy.com Haley Waller Pitts Fredrikson & Byron, P.A. 200 South Sixth Street, Suite 4000 Minneapolis, MN 55402 (612) 492-7000 hwallerpitts@fredlaw.com

Kate M. Heins Associate General Counsel Apex Clean Energy 310 4th St. NE, Suite 200 Charlottesville, VA 22902 (434) 282-2113 kate.heins@apexcleanenergy.com

Please let me know if you have any questions regarding this filing.

Sincerely,

/s/ Christina K. Brusven

Christina K. Brusven

Attorney at Law

Direct Dial: 612.492.7412

Email: cbrusven@fredlaw.com

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## **CERTIFICATE OF SERVICE**

I, Alicia P. Jones, hereby certify that I have this day served true and correct copies of the following documents to all persons on the attached service list by electronic filing or by depositing the same enveloped with postage paid in the United States mail at Minneapolis, Minnesota:

- 1. Cover Letter;
- 2. Summary of Filing;
- 3. Big Bend Wind, LLC's Certificate of Need Application, Figures, Public Appendix A, NONPUBLIC Appendix A; and
- 4. Certificate of Service.

MPUC Docket No. IP-7013/CN-19-408

Dated this 9th day of November 2020

/s/ Alicia P. Jones

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000 Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_19-408_CN-19- 408
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.st ate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-408_CN-19- 408
Kate	Fairman	kate.frantz@state.mn.us	Department of Natural Resources	Box 32 500 Lafayette Rd St. Paul, MN 551554032	Electronic Service	No	OFF_SL_19-408_CN-19- 408
Annie	Felix Gerth	annie.felix- gerth@state.mn.us		Board of Water & Soil Resources 520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	OFF_SL_19-408_CN-19-408
Sharon	Ferguson	sharon.ferguson@state.mn .us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_19-408_CN-19- 408
Lucas	Franco	Ifranco@liunagroc.com	LIUNA	81 Little Canada Rd E  Little Canada, MN 55117	Electronic Service	No	OFF_SL_19-408_CN-19- 408
Brenna	Gunderson	Brenna.gunderson@apexcl eanenergy.com	Apex Clean Eenrgy	8665 Hudson Blvd N Ste 110 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_19-408_CN-19- 408
Kate M	Heins	kate.heins@apexcleanener gy.com	Apex Clean Energy	310 4th St NE Ste 200  Charlottesville, VA 22902	Electronic Service	No	OFF_SL_19-408_CN-19- 408
Kari	Howe	kari.howe@state.mn.us	DEED	332 Minnesota St, #E200 1ST National Bank Blo St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-408_CN-19- 408
Ray	Kirsch	Raymond.Kirsch@state.mn .us	Department of Commerce	85 7th Place E Ste 500  St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-408_CN-19- 408

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Karen	Kromar	karen.kromar@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	OFF_SL_19-408_CN-19- 408
Chris	Kunkle	chris.kunkle@apexcleanen ergy.com	Apex Clean Energy	8665 Hudson Blvd North, Suite 110 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_19-408_CN-19- 408
Susan	Medhaug	Susan.medhaug@state.mn .us	Department of Commerce	Suite 280, 85 Seventh Place East St. Paul, MN 551012198	Electronic Service	No	OFF_SL_19-408_CN-19- 408
Generic Notice	Residential Utilities Division	residential.utilities@ag.stat e.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-408_CN-19- 408
Stephan	Roos	stephan.roos@state.mn.us	MN Department of Agriculture	625 Robert St N Saint Paul, MN 55155-2538	Electronic Service	No	OFF_SL_19-408_CN-19- 408
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-408_CN-19- 408
Haley	Waller Pitts	hwallerpitts@fredlaw.com	Fredrikson & Byron, P.A.	200 S 6th St Ste 4000 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-408_CN-19- 408
Cynthia	Warzecha	cynthia.warzecha@state.m n.us	Minnesota Department of Natural Resources	500 Lafayette Road Box 25 St. Paul, Minnesota 55155-4040	Electronic Service	No	OFF_SL_19-408_CN-19- 408