



November 15, 2010

Dr. Burl Haar, Executive Secretary
Minnesota Public Utilities Commission
350 Metro Square
121 Seventh Place East
St. Paul, Minnesota 55101

**Re: In the Matter of the 78 MW AWA Goodhue Wind Project
MPUC Docket Nos. IP-6701/CN-09-1186 and IP-6701/WS-08-1233
Comments on Petition for Reconsideration**

Dear Dr. Haar:

Thank you for the opportunity for Wind on the Wires (WOW) to provide an Answer to the AWA Goodhue Wind Project Petition for Reconsideration. As the Commission is aware, Josh Gackle, WOW Regional Policy Manager, West offered verbal comments at the October 21, 2010 Commission hearing in which the Goodhue project Certificate of Need and Site Permit were first considered for approval. As noted in the original oral comments, WOW has a standard practice of not participating in Commission proceedings on specific projects of our members. However, we continue to believe that the overly restrictive siting protocol being considered by the Commission in this docket would adversely affect efficient and cost effective wind development throughout Minnesota.

WOW focused our October 21st verbal comments on two specific items; the unique transmission characteristics of the Goodhue project, and the negative precedent that would be set with a ten rotor-diameter setback standard. These two issues are discussed in more detail below.

For those reasons, and as discussed in the full record developed by OES and others, we urge the Commission to accept the Applicant's Reconsideration Petition and approve the Certificate of Need and Site Permit as offered at the Commission hearing on October 21st, 2010.

Unique Transmission Characteristics of the Goodhue Wind Project

As the Commission is aware, access to transmission is one of the most significant barriers for wind development throughout the Midwest. We feel it is critically important for the Commission to keep in mind the results of the Minnesota Dispersed Renewable

Generation Study that was completed in 2008 (Phase 1) and 2009 (Phase 2). This study, required by the Next Generation Energy Act of 2007, was undertaken in order to find the geographic areas in the state that are best suited for wind development¹ with minimal new transmission line construction or other transmission upgrades.

The footprint of the Goodhue wind project is in an area of the state identified by Phase 1 of the study, and as such requires very little high-voltage transmission or other network upgrades. Especially, and until, overall transmission barriers are addressed, wind development that can take advantage of locations that require little in the way of transmission upgrades should be promoted in order to continue cost-effective and efficient development of Minnesota's rich wind resources.

Precedent of a Ten Rotor Diameter Setback

Second, WOW is concerned about the negative precedent that would be set in the state of Minnesota if the siting and setback ordinances adopted by the county in this docket were to be ordered by the Commission. As presented in the OES recommendations, a 10 rotor diameter buffer – essentially one-half mile - from non-participating landowners would prevent the Goodhue project from proceeding. Once adopted, this overly restrictive standard, without a basis in peer reviewed research, would have a negative impact on development throughout the state.

WOW members are committed to working with local citizens, communities and government jurisdictions across the state to assure reasonable siting of wind turbines that would preserve public health and safety. However, setback standards and other siting rules that too greatly restrict where turbines can effectively be sited will make Minnesota a less attractive option for developers, and will have the likely effect of driving up the overall price of wind in the state or ultimately driving wind energy, and the accompanying jobs and economic development, to other parts of the country.

Minnesota has long been committed to developing our own wind energy resources to create Minnesota jobs, diversify our energy supply, and bring economic development to local communities. The wind industry continues to work to be a good neighbor and set reasonable standards that allow for responsible development and protect public health and safety. Wind on the Wires is committed to making sure that wind development happens responsibly so that Minnesota remains open for business and can actively participate in building our clean energy economy.

In summary, , for the reasons identified above, as well as for reasons identified throughout the record by OES, we urge the Commission to approve the Reconsideration Petition and move to expedited approval of the underlying Site Permit and Certificate of Need.

¹ The Minnesota Dispersed Renewable Generation Study looked at places in the state where the current transmission infrastructure could accommodate wind development in 10-40 megawatt increments. The Goodhue Wind Project utilized 2 locations identified in the study for the 78 megawatt project.

Thank you for the opportunity to submit written comments in this proceeding.

Sincerely,

A handwritten signature in black ink that reads "Beth Soholt". The signature is written in a cursive style with a long horizontal stroke at the end.

Beth Soholt
Executive Director
Wind on the Wires