



November 15, 2010

David Boyd, Chair  
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 Chairman Boyd and Dr. Haar:

As you may know, GE Energy intends to supply wind turbines to a 78 megawatt project in Goodhue County, Minnesota. It is our understanding that the County recently passed an ordinance requiring a ten rotor-diameter setback for wind projects of 5 MW or less and that, while the project in question should not be subject to this requirement, the MPUC has opted to defer its vote on whether to grant permitting approval to AWA Goodhue, the project developer. As the leading US wind turbine supplier, we believe this development has potentially negative implications not only for the project but for wind development in the state and region, and we therefore request reconsideration of this matter.

GE Energy has a significant wind turbine footprint in Minnesota, with over 500 MW of our 1.5 MW model turbine under construction or in operation and another 500 MW recently approved by the MPUC. Our 1.5 platform is assembled in Greenville, South Carolina with components sourced throughout North America and globally. Over 14,000 of our 1.5 units are in operation in 19 different countries. Since our first turbine went into operation in 1996, GE Energy turbines have generated over 100,000 gigawatt hours of electricity and have been in operation for nearly 200 million hours. The GE turbines provide state-of-the-art technology and are one of the world's most widely used wind turbines in its class.

I have enclosed a brochure with more information about GE turbines. This brochure is also available at [http://www.gepower.com/prod\\_serv/products/wind\\_turbines/en/downloads/GEA14954C15-MW-Broch.pdf](http://www.gepower.com/prod_serv/products/wind_turbines/en/downloads/GEA14954C15-MW-Broch.pdf)

It is our understanding that the MPUC decided to delay this matter until further hearings could be held to address the question of whether a ten rotor-diameter setback established by the county should be imposed in this situation. GE Energy issues setback recommendations to mitigate the risk of ice throw and component liberation for utility scale wind projects. The set-back recommendation for the AWA Goodhue project is 1.5 x (Hub Height + Rotor Diameter), which is approximately 800 feet. Additionally, GE Energy provides noise emissions guarantees for our wind turbines at the point of emission, and AWA



GE Energy

Seth Dunn – Renewables Policy Leader

Goodhue has used this technical data to model the project to meet the Minnesota noise standards. We are happy to share additional details on the noise emissions and setback recommendations of our turbines, and to explain the rigor that has been applied to the design and validation of the equipment.

GE Energy views Minnesota as a leading wind state—not only for its installed capacity but for its role as a trend-setter with respect to policy development in the Midwest. For this reason, we are especially concerned about the potential precedent of what appears to be the retroactive imposition of a community-scale wind permitting requirement on a utility-scale wind project. If such a development were to be repeated elsewhere in the state and the region, we would expect wind project development to shift to other regions and for Minnesota and other Midwest states to fall short of their renewable portfolio standard requirements.

As noted above, GE has been a prominent part of Minnesota’s successful wind development to date and intends to participate in its continued growth. This participation includes sharing our turbine expertise with customers and stakeholders to ensure the responsible siting of wind turbines. As the MPUC begins to take a more comprehensive approach to siting policy, we hope it will constructively engage wind industry stakeholders in this important process. We thank you for the opportunity to provide comments and encourage the Commission to work toward a fair resolution of this issue.

Sincerely,

Seth Dunn  
Renewables Policy Leader  
GE Energy

cc: Michael Volpe – GE Account Manager

GE Energy  
1 River Road  
53-401A  
Schenectady, NY 12345

Phone 518-385-5910 2  
Cell 518-867-9147  
E-mail Seth.Dunn@ge.com