



August 24, 2018

Daniel Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

Re: Re: In the Matter of Possible rulemaking to Amend Rules Chapter 7854 Docket No. E999/R-18-518

Dear Mr. Wolf:

Wind on the Wires (WOW) respectfully submits these comments in response to Goodhue Wind Truth's petition for rulemaking of Minnesota Rules Chapter 7854.

Complying with requirements as set out in Minnesota Rules 1400.2040, Subp. 1

Goodhue Wind Truth clearly meets the requirements of providing name and address of the petitioner; however, the petitioner fails to present specifics with respect to the amendments requested. While it is clear that Goodhue Wind Truth expresses disaffection with the current siting criteria and environmental considerations, the petition does not present a sufficient basis to amend siting standards for the Large Wind Energy Conversion Systems (LWEC).

Criteria for Siting LWECs

Goodhue Wind Truth argues that there are no rules regarding criteria for siting LWECs. The Environmental Quality Board published rules for the siting LWECs in 2002 which are established in Minnesota Rules Chapter 7854. This was outlined for Ms. Overland (Goodhue Wind Truth) in a 2012 letter. The letter states that "Wind Siting was promulgated in 2002. These rules apply to large wind energy conversion systems 5MW and larger in size." Therefore, the petitioner's argument that there are no rules for the siting of LWECs is incorrect.

Requirements for Environmental Review

Goodhue Wind Truth also argue that there are no requirements for environmental review. Minnesota Statute 216F.03 specifies that it is to be the policy of the state to site LWECs in an orderly manner compatible with environmental preservation. This is also stated in Minnesota Rules 7854.0500 Subp. 3. Furthermore, Minnesota Rules 7854.0500 Subp. 7 provides requirements for environmental review and specifically states that this subpart satisfies the requirements in Minnesota Rules 4410 which covers environmental review as well as rules governing the siting of large electric generating facilities and high voltage transmission lines.

Lastly, this subpart satisfies the requirements of Minnesota Statute 116D which establishes the framework for state environmental policy.

The fact that Goodhue Wind Truth is not satisfied with the siting and environmental review for LWECS is not evidence that the rule is deficient. The existing rules provide the Public Utilities Commission flexibility to evaluate and make permitting determinations for LWECS. Establishing more prescriptive rules for the siting of LWECS, as suggested by the petitioner, will only reduce the Commission's ability to address the public's concern. WOW appreciates the opportunity to comment and recommends that the Commission deny the petitioner's request to initiate rulemaking on siting standards for LWECS.

Thank you for the opportunity to submit these comments in response to Goodhue Wind Truth's petition for rulemaking of Minnesota Rules Chapter 7854.

Sincerely,

A handwritten signature in black ink, appearing to read "Peder Mewis". The signature is written in a cursive style with a horizontal line at the end.

Peder Mewis
Regional Policy Manager – West
Wind on the Wires
570 Asbury Street, Suite 201
St. Paul, MN 55104