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August 24, 2018

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

Re: In the matter of possible rulemaking to amend Rules Chapter 7854 Docket No. E999/R-18-518

Dear Mr. Wolf,

EDF Renewables submits this letter in response to Goodhue Wind Truth's petition for rulemaking submitted July 30, 2018. The Commission requested comments on whether the petition for rulemaking meets the content requirements of Minn. R. 1400.2040 and whether the Commission should initiate a rulemaking on siting standards for Large Wind Energy Conversion Systems (LWECS). EDF Renewables respectfully asserts that the existing siting standards for LWECS are prudent and that the Minnesota Public Utilities Commission should not initiate a rulemaking at this time.

EDF Renewables has successfully permitted and built over 1200 megawatts of wind in the state of Minnesota with some of our projects successfully operating for over ten years. Minnesota is a highly regulated marketplace for both wind and solar energy projects with stronger setback, lease, and environmental regulations than many of its Midwest peers. Even with a highly regulated marketplace, EDF Renewables has considered Minnesota to be a target for future investment.

The Environmental Quality Board published rules for the siting of LWECS in 2002, which are now housed in Minnesota Rules chapter 7854. These rules apply to all wind conversion systems greater than 5 MW. State law and rules specify that it is the policy of the state to site LWECS in an orderly manner compatible with environmental preservation. Permit applications are required to address all potential negative environmental impacts.

As written, the existing rules provide the commission flexibility to evaluate and make permitting decisions. Establishing more prescriptive rules would reduce the Commission's ability to make sound judgments and will only reduce their ability to address the public's concerns.

Minnesota's permitting process is already more rigorous than neighboring states and initiating a rulemaking will create uncertainty for additional investment in the state.



EDF Renewables appreciates the opportunity to comment and recommends that the Commission deny the petitioner's request to initiate rulemaking on siting standards for LWECS.

Sincerely,

A handwritten signature in black ink that reads "Thomas P. Carlson Jr." in a cursive script.

Thomas Carlson
Manager, Regulatory & Legislative Affairs
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651-587-0730