



414 Nicollet Mall
Minneapolis, MN 55401

December 6, 2019

—Via Electronic Filing—

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

RE: COMPLIANCE FILING
FREEBORN WIND SITE PERMIT
DOCKET NO. IP-6946/WS-17-410

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this compliance filing for the Freeborn Wind Energy project, in compliance with the Large Wind Energy Conversion System (LWECS) Site Permit Section 10.1, Pre-Construction Meeting.

This Pre-Construction filing is made for a singular phase of the wind farm project: project substation and O&M building site preparation (grading in a row crop agricultural field on land owned by Xcel Energy) and pouring of the concrete pad. Xcel Energy currently has an LWECS Site Permit Amendment application before the Commission and notes that an earlier LWECS Site Permit Amendment is currently the subject of an appeal in the Minnesota Court of Appeals; however, the project substation and O&M building, which are permitted, associated facilities in the original and current LWECS permit are not proposed to be changed in location nor design, and would be built as shown in these documents whether the permit amendment is approved or not, and are not within the scope of the appeal.

The same phased approach to construction was used for the Blazing Star 1 and 2 Wind Farm substation projects. The pre-construction documentation herein applies only to the substation and O&M building sites. Pre-construction documentation relative to turbine construction will be filed at a later date.

Section 10.1 of the Site Permit states:

Prior to the start of any construction, the Permittee shall participate in a pre-construction meeting with the Department of Commerce and Commission staff to review pre-construction filing requirements, scheduling, and to coordinate monitoring of construction and site restoration activities. Within 14 days following the pre-construction meeting, the Permittee shall file with the Commission, a summary of the topics reviewed and discussed and a list of attendees. The Permittee shall indicate in the filing the construction start date.

Attachment A to this filing is the meeting summary.

We have electronically filed this letter and copies have been served on the parties on the attached service list. Please contact me at (612) 330-6064 or bria.e.shea@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

BRIA E. SHEA
DIRECTOR, REGULATORY AND STRATEGIC ANALYSIS

Enclosure
c: Service List

**Monday, November 25, 2019
10:30 a.m.**

**PRE-CONSTRUCTION MEETING SUMMARY
PROJECT SUBSTATION AND O&M BUILDING**

**FREEBORN WIND FARM
PUC DOCKET NO. IP-6946/WS-17-410**

Meeting Location

Department of Commerce – Energy Environmental Review and Analysis
EERA Conference Room, 2nd Floor
Golden Rule Building
St. Paul, MN

Conference Call Information

Conference Call-in: 612-330-5656
Passcode: 9288490

- I. Introductions (DOC-EERA, Commission staff, Xcel Energy Staff, County staff)
 - Mike Kaluzniak (PUC)
 - Dave Rasmussen (Freeborn County; phone)
 - Rich Davis (DOC-EERA project manager)
 - Amanuel Haile (Xcel Energy)
 - Matt Langan (Xcel Energy)
 - Patti Leaf (Xcel Energy)
 - Kate Schindler (Xcel Energy; phone)
 - Roland Sulzer (Xcel Energy; phone)

- II. State Role in Permitting LWECs (DOC-EERA)
 - Meeting notes filed by Applicant w/in 14 days
 - Notes should reference any needed follow up items; outstanding issues.
Follow-up items listed in red text below
 - Confirmation that this is only related to construction of the substation/O&M building and does not include anything that is in the current, outstanding site permit amendment application
 - Pre-construction meeting required per permit; EERA is compliance staff for the permit
 - EERA sends letter to Commission staff after receiving Applicant's minutes
 - Commission staff issues letter that allows commencement of construction
 - Rich spoke with Sue Miller at Freeborn County and she requested that the

second pre-construction meeting – which will focus on the remainder of the wind farm project and transmission line – be held in the County office.

III. Review of Permit Compliance Filings Submitted to Date (DOC-EERA): Partial project construction, filings as they apply to the project substation and O&M building (November 8 filings):

- Section 4.7: Native Prairie Protection Plan; filed a letter indicating per surveys no native prairie present at the substation nor O&M building site and that the NPPP will be filed ahead of the second pre-construction meeting. This is a long lead time item.
- Section 5.2.1: Field Rep; Sean Lawler identified
- Section 5.2.6: SWPPP
- Section 5.2.10: Invasive Species; mostly agricultural, no major concerns
- Section 5.2.12: Identification of Roads
 - Discussion of coordination between Sean Lawler and Sue Miller on developing route for this phase of construction.
 - EERA asked for clarification of road authorities for identification of roads used to access O&M and Substation site. Road for access to O&M and Substation is a Shell Rock Township road. Other roads to be used are County Roads.
- Section 5.5.2: Other Permits
 - Approach Permit; Sue Miller has granted access to site based on Xcel's agreement to have one approach for each facility with two temporary approaches.
 - EERA would like to see confirmation of County approval to access Substation and O&M sites. Xcel has a Road Use Management Agreement signed by Freeborn County, and joined by Shell Rock Township via Resolution. Xcel intends to use an existing approach to the site near the intersection of 840th Avenue and County Road 1. This approach has been approved by Freeborn County.
- Section 7.1: Biological & Natural Resources Inventories; 30-day filing for next pre-construction meeting; EERA has not been using full 30 days for disturbed sites like Freeborn
- Section 9.0: Complaint Procedures
 - May 10, 2019 order says it will be updated after construction
 - Dan Litchfield listed as preconstruction contact; EERA would like another filing providing clarity on where communications should be directed. Xcel Energy is filing an updated Complaint Procedures document with the correct company contact information.
- Section 10.1: Pre-con meeting; reference to notes in this section
- Section 10.3: Site plan
- Section 10.10: Emergency Response Plan; needs to be updated prior to pre-operation meeting

IV. Review and Discussion of Other Site Permit Conditions

V. Construction Schedule (Xcel Staff)

- EERA requested an update; can be put into the meeting minutes. Only include activities for this phase of construction.
 - Notice on laying of frost blanket this month
 - Excavation and pour O&M foundation; December 8, 2019 is 30 days following filing of site plan; however, we will need PUC approval letter prior to start of construction
 - Q1 2020: start shell of O&M building
 - Q2 2020: complete O&M and substation foundations; start of other project construction activities

VI. Other Topics

- EERA to follow up with Sue Miller to make sure she has no outstanding issues

CERTIFICATE OF SERVICE

I, Lynnette Sweet, hereby certify that I have this day served copies or summaries of the foregoing documents on the attached list(s) of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States Mail at Minneapolis, Minnesota

or

xx electronic filing

Docket No. IP-6946/WS-17-410

Dated this 6th day of December 2019

/s/

Lynnette Sweet
Regulatory Administrator

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Lisa	Agrimonti	lagrimonti@fredlaw.com	Fredrikson & Byron, P.A.	200 South Sixth Street Suite 4000 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-410_Official Service list Site permit
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000 Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_17-410_Official Service list Site permit
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	No	OFF_SL_17-410_Official Service list Site permit
Richard	Davis	Richard.Davis@state.mn.us	Department of Commerce	85 7th Place East Suite 500 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_17-410_Official Service list Site permit
Bret	Eknes	bret.eknes@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_17-410_Official Service list Site permit
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_17-410_Official Service list Site permit
Sean	Gaston	sean.p.gaston@gmail.com		11133 850th Ave Glenville, MN 56036	Electronic Service	No	OFF_SL_17-410_Official Service list Site permit
Dorene	Hansen	dhansen078@gmail.com		12174 840 Avenue Glenville, MN 56036-4481	Electronic Service	No	OFF_SL_17-410_Official Service list Site permit
David	Harbert	dharbert@kaaltv.com	KAAL-TV	1320 Salem Rd SW Rochester, MN 55902	Electronic Service	No	OFF_SL_17-410_Official Service list Site permit
Matt	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY	401 Nicollet Mall FL 8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_17-410_Official Service list Site permit

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Linda	Jensen	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134	Electronic Service	No	OFF_SL_17-410_Official Service list Site permit
Michael	Kaluzniak	mike.kaluzniak@state.mn.us	Public Utilities Commission	Suite 350 121 Seventh Place East St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_17-410_Official Service list Site permit
Dan	Litchfield	DLitchfield@invenergyllc.com	Invenergy LLC	One S Wacker Dr Ste 1800 Chicago, IL 60606	Electronic Service	No	OFF_SL_17-410_Official Service list Site permit
Sue	Madson	sue_madson@hotmail.com		14806 830th Ave Glenville, MN 56036	Electronic Service	No	OFF_SL_17-410_Official Service list Site permit
Gregory R.	Merz	gregory.merz@gpmlaw.com	Gray, Plant, Mooty	80 S 8th St Ste 500 Minneapolis, MN 55402-5383	Electronic Service	No	OFF_SL_17-410_Official Service list Site permit
Allie	Olson	aa_olson@hotmail.com		12225 810th Ave Glenville, MN 56036	Electronic Service	No	OFF_SL_17-410_Official Service list Site permit
Carol A.	Overland	overland@legalectric.org	Legaelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_17-410_Official Service list Site permit
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	No	OFF_SL_17-410_Official Service list Site permit
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_17-410_Official Service list Site permit

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
LauraSue	Schlatter	LauraSue.Schlatter@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 55164-0620	Electronic Service	No	OFF_SL_17-410_Official Service list Site permit
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_17-410_Official Service list Site permit
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_17-410_Official Service list Site permit
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	No	OFF_SL_17-410_Official Service list Site permit