

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF RAMSEY

SECOND JUDICIAL DISTRICT

State of Minnesota, ex. rel., Association of
Freeborn County Landowners,

Case Type: Other Civil
Court File No.: 62-CV-20-3674
Judge: Hon. Sara Grewing

Plaintiff,

v.

Minnesota Public Utilities Commission,

**DECLARATION OF
JORDAN BURMEISTER**

Defendant,

and

Buffalo Ridge Wind LLC, Three Waters
Wind LLC, Northern States Power
Company, Plum Creek Wind Farm, LLC,

Defendant-Intervenors.

I, Jordan Bermeister, under penalty of perjury, state the following:

1. I am a Senior Developer at Geronimo Energy, LLC, a National Grid company (“Geronimo”). Geronimo is the parent company of Plum Creek Wind Farm, LLC (“Plum Creek”). This Declaration is filed in Opposition to Plaintiff Association of Freeborn County Landowners (“AFCL”)’s Motion for Temporary Injunction.

2. Plum Creek is developing the up to 414 megawatt Plum Creek Wind Farm (“Wind Farm”) in Cottonwood, Murray and Redwood counties in Minnesota.

3. I earned a Bachelor of Arts degree in Business Administration from Augustana College in Sioux Falls, South Dakota, in 2008. I have worked in the renewable energy industry for more than eleven (11) years. My title with Geronimo is Senior Developer, Market Lead. I am the lead developer for the Wind Farm. I was responsible for coordinating, supervising and

preparing the Supplemental and Amended Application for a Large Wind Energy System Application for a Site Permit, Application for a Certificate of Need and Application for a Route Permit (“Applications”) that are currently pending before the Minnesota Public Utilities Commission (“MPUC”). I have also managed the Wind Farm including retaining consultants, and coordinating development of the Wind Farm.

4. The Wind Farm will require construction of the following:

- Up to 74 wind turbines and related equipment;
- New gravel access roads and improvements to existing roads;
- Underground and/or aboveground electrical collection and communication lines totaling approximately 125 miles;
- Operations and maintenance (“O&M”) facility;
- Two collector substations;
- Up to four permanent meteorological towers;
- Sonic Detection and Ranging (“SoDAR”) or Light Detection and Ranging (“LiDAR”) unit;
- Up to three laydown areas;
- Access roads totaling approximately 21 miles;
- Up to two Aircraft Detection Lighting Systems (“ADLS”) radars; and
- Up to two temporary batch plant areas for construction of the Wind Farm.

5. To connect the Wind Farm to the transmission grid, Plum Creek will also need to construct a 345 kV transmission line (“Gen-Tie”) that will be approximately 31 miles long, depending on final route.

6. Construction of the Wind Farm and Gen-Tie will take 18 months. Approximately 250 construction personnel will be required for construction and 11 to 15 permanent personnel will be needed for operation and maintenance of the Wind Farm.

7. The Wind Farm is scheduled to commence commercial operation by the end of calendar year 2022. To meet the end of 2022 commercial operation date, the MPUC proceedings must proceed pursuant to the schedule the Administrative Law Judge (“ALJ”) established on July 23, 2020 in her First Prehearing Order, available at <https://www.edockets.state.mn.us>, eDocket No. 20207-165227-01. Under the First Prehearing Order, the ALJ’s report will issue April 15, 2021. The MPUC’s decision is expected to issue within approximately sixty (60) days of that date, or by June 14, 2021. *See* Minn. Stat. § 216E.03, subd. 9 (providing that MPUC order shall issue decision on transmission line route permit within 60 days of ALJ report unless extended by good cause or agreement of applicant). Construction is slated to start in August 2021.

8. I have thoroughly reviewed the construction requirements and schedule for the Wind Farm with the subject matter experts at Geronimo. If the MPUC permitting decisions, site permit, certificate of need and route permit, for the Wind Farm and Gen-Tie are delayed beyond August 2021, then the Wind Farm could not be in service by December 31, 2022. The financial consequences of such delay would be substantial, as detailed in the Declaration of Andrew Terwilliger.

I declare under penalty of perjury that everything I have stated in this document is true and correct

Dated: August 19, 2020
Lakefield, Minnesota

/s/Jordan Burmeister
Jordan Burmeister