

June 8, 2020

Mark Wengierski, Senior Project Manager
Three Waters Wind Farm, LLC, c/o Scout Clean Energy
4865 Sterling Drive, Suite 200
Boulder, CO 80301

Sent via email: mark@scoutcleanenergy.com

RE: Proposed Project Revisions and Updates
Three Waters Wind Farm, Jackson County, Minnesota
Docket No. IP-7002/WS-19-576

Dear Mr. Wengierski,

On June 3, 2020, Three Waters Wind Farm, LLC filed four direct testimony documents in eDockets, which include testimony from Eddie Duncan, Todd Mabee, and yourself. Within the filed direct testimony there is discussion of revisions to the Three Waters Wind Farm (Project), which vary from how the Project was presented in the Site Permit Application. EERA was notified via email from your council, Mr. Jeremy Duehr, on May 19, 2020, the turbine layout had been decreased from 71 primary turbine locations and eight alternate turbine locations to 52 primary turbine locations and 18 alternate turbine locations. It has also come to EERA's attention that a number of the locations are new turbines not proposed in the site permit application. With the exception of the May 19th email, and a phone conversation EERA had with Mr. Duehr on June 4th, there is currently no stand-alone documentation in the Project docket to: identify how these proposed project amendments compare to the initial site permit application, provide reasoning for the revisions made, and identify how the revisions have or have not affected the proposed project impacts described in the initial site permit application.

EERA believes a stand-alone amendment or addendum to the site permit application filed to the Project docket is necessary to provide clarity with respect to proposed project revisions, and to allow record development for the associated environmental review of the proposed Project.

EERA recommends a site permit application amendment be filed to the Project docket. The amendment should describe the proposed project revisions, and address all components of the site permit application as they would be affected by the proposed project revisions. EERA recognizes aspects of these changes have been addressed at a high level in the direct testimony

filings, but we do not believe the overview in the testimony sufficiently addresses potential environmental impacts or allows for adequate record development. If the Company disagrees, EERA believes the Company should provide an explanation in the record.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Davis". The signature is fluid and cursive, with the first name "Richard" and last name "Davis" clearly distinguishable.

Richard Davis
Environmental Review Manager

Cc: Louise Miltich, DOC-EERA
Cezar Panait, Commission – EFP
Bret Eknes, Commission - EFP
Jeremy Duehr, Fredrikson & Byron, P.A.
Haley Waller Pitts, Fredrikson & Byron, P.A.