

July 17, 2020

Via Electronic Filing

The Honorable Jim Mortenson
Administrative Law Judge
Office of Administrative Hearings
P.O. Box 64620
St. Paul, MN 55164-0620

Re: **Motion to Suspend Procedural Schedule of Three Waters Wind Farm, LLC**

In the Matter of the Applications of Three Waters Wind Farm, LLC for a Certificate of Need and Site Permit for the up to 201 MW Three Waters Wind Project in Jackson County, Minnesota

MPUC Docket Nos. IP-7002/WS-19-576 and IP-7002/CN-19-154

Dear Judge Mortenson:

Three Waters Wind Farm, LLC (“Three Waters”) respectfully submits the attached Motion requesting a suspension of the current procedural schedule set forth in Your Honor’s June 15, 2020 Continuance Order issued in the above-referenced dockets.

Thank you for your attention to this filing. Please let me know if you have any questions regarding this filing.

Sincerely,

Stinson LLP

/s/ Brian M. Meloy

**BEFORE THE
OFFICE OF ADMINISTRATIVE HEARINGS
FOR THE MINNESOTA PUBLIC UTILITIES COMMISSION**

<i>In the Matter of the Applications of Three Waters Wind Farm, LLC for a Certificate of Need and Site Permit for the up to 201 MW Three Waters Wind Project in Jackson County, Minnesota</i>	MPUC Docket Nos. IP-7002/WS-19-576 IP-7002/CN-19-154 OAH Docket No. 5-2500-35668
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**MOTION TO SUSPEND PROCEDURAL SCHEDULE
OF THREE WATERS WIND FARM, LLC**

TO: The Honorable Jim Mortenson

Three Waters Wind Farm, LLC (“Three Waters”) respectfully submits this Motion requesting a suspension of the current procedural schedule set forth in Your Honor’s June 15, 2020 Continuance Order issued in the above-referenced dockets.

On July 14, 2020, Three Waters notified the Minnesota Public Utilities Commission (“Commission”) of a change in upstream ownership. In particular, on July 14, 2020, Twin Wind, LLC, a Delaware limited liability company and an indirect wholly-owned subsidiary of NextEra Energy Resources, LLC, acquired all the membership interests in Three Waters from Scout Clean Energy.

Three Waters is currently evaluating the impact this change in ownership will have on the current Certificate of Need and Siting processes. At the same time, Three Waters recognizes that a Public Hearing has been scheduled for July 28, 2020. Three Waters does not believe that it would be administratively efficient or the best use of limited resources to hold the scheduled Public Hearing or continue to move forward under the existing procedural schedule because of the

possible changes to the Project. Thus, suspension of the current procedural schedule is warranted for good cause.

Three Waters commits to provide the Commission, Your Honor, and all parties with an update within thirty (30) days, explaining its plans to move forward with the wind project, at which point the next procedural steps can also be determined. Three Waters appreciates your consideration of this request.

Dated: July 17, 2020

Respectfully Submitted,

/s/ **Brian Meloy**

Brian M. Meloy

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**BEFORE THE
OFFICE OF ADMINISTRATIVE HEARINGS
FOR THE MINNESOTA PUBLIC UTILITIES COMMISSION**

<i>In the Matter of the Applications of Three</i>)	Docket Nos. IP-7002/WS-19-576
<i>Waters Wind Farm, LLC for a Certificate of</i>)	IP-7002/CN-19-154
<i>Need and Site Permit for the up to 201 MW</i>)	
<i>Three Waters Wind Project in Jackson</i>)	OAH Docket No. 5-2500-35668
<i>County, Minnesota</i>)	
)	CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of **Three Waters Wind Farm, LLC's, Motion to Suspend Procedural Schedule** has been served today by e-mail and/or U.S. Mail to the following:

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Dated this 17th day of July, 2020

/s/ Joshua M. Feit

Joshua M. Feit