



March 4, 2022

VIA ELECTRONIC FILING: NDPSC@ND.gov

North Dakota Public Service Commission
State Capitol Building
600 East Boulevard Avenue, No. 408
Bismarck, North Dakota 58505-0480

RE: Case No. PU-05-47 –Rugby Wind LLC ADLS Implementation Update

Dear Sir or Madam:

Rugby Wind LLC respectfully submits this update of implementation of Aircraft Detection Lighting System (ADLS) light mitigation required by N.D.C.C. Chapter 69-06-01 at its Rugby Wind Farm, located in Pierce County, North Dakota. While we regret to inform the Commission that the project is not yet complete, the ADLS lattice tower has been erected, electrical and communications have been installed, turbine lighting has been upgraded throughout the wind farm to work with ADLS, and the ADLS is currently undergoing testing and commissioning. We are providing this update to demonstrate our significant efforts to meet our obligations as quickly as possible, to be transparent regarding our progress, and to provide an opportunity for the Commission to contact us with questions.

As discussed in the hearing on December 17, 2021, we have been working in expedited fashion to achieve compliance with North Dakota's light mitigation requirements as quickly and safely as possible. In that hearing, we stated that our goal was to achieve compliance by the December 31, 2021 deadline but were concerned about several challenges to meeting that timeline. Due to supply chain, shipping, and weather issues, the project has indeed been delayed. However, we have invested additional resources into the project and worked with our vendors to keep construction going through the winter, something we and our vendors have never done before. Because of this extra push to work through the winter, we have made considerable progress on the project, and are now entering the testing and commissioning phase of the ADLS installation.

As discussed in our filing dated November 2, 2021, one significant limiting factor was delivery of the ADLS system from the manufacturer in Europe. Last summer, the equipment supplier, Terma North America, estimated the radar system would be delivered in November. This fall, they amended the estimated delivery date to February of 2022. We shortened the delivery time of the ADLS and reduced risk of international shipping problems by shipping the ADLS radar component ahead via ocean freight. Then we shipped the ADLS electronics cabinet for operating the system, once manufacturing and testing was complete, via airfreight (instead of the typical of shipping everything together via ocean freight). The radar antenna was delivered in early January and the cabinet arrived on site the fourth week of January.

Before the last ADLS components arrived, we completed as much “civil work” (roads, concrete foundation for the tower, trenching, etc.) as possible. Therefore, once the electronics cabinet arrived, erection of the tower was able to start the next day. Installation of the radar immediately followed, but was delayed by high winds, despite the special enclosure our vendors installed to allow for the electronics work to proceed in winter weather. The radar installation was completed on February 15. For your information, we have enclosed pictures of the tower and installation process.

The project has now entered the final phase of installation: testing and commissioning. The testing, which involves watching how the system responds to actual aircraft in the area, may require hiring a plane to conduct overflights to test the system so that efficiency testing is completed more quickly because the natural occurrence of a flights in this region is low. This commissioning process is a necessary step to ensure safe operation for aviation. With this expedited commissioning approach, we anticipate the project to be fully operational in April.

We will provide a final update to the Commission when the commissioning is complete and the system is fully operational. In the meantime, please do not hesitate to contact me with questions.

Sincerely,

 /s/ Peter Landoni

Feb 5, 2022 at 4:08:11 PM
Rugby ND 58368
United States



Rugby ADLS radar unit with enclosure on ground.

Feb 15, 2022 at 3:45:49 PM
48.499760° N, 99.970081° W
65° NE
Rugby ND 58368
United States



Rugby ADLS lattice tower with installed radar unit.