

**BASIN ELECTRIC
POWER COOPERATIVE**

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November 26, 2007

Ilona A. Jeffcoat-Sacco
Executive Director, Public Service Commission
600 East Boulevard Avenue
Department 408
Bismarck, North Dakota 58505-0480

Re: Wind Turbine Decommissioning: Case No. 07-642

Dear Ms. Jeffcoat-Sacco:

Enclosed please find Basin Electric Power Cooperative's comments in the above-referenced docket.

Questions can be addressed to me at 701/355-5120.

Regards,

Ron Rebenitsch
Manager, Alternative Technologies

Enclosures

cc: Deborah Fohr Levchak
Curtis Jabs
Casey Jacobson
Amanda Wangler
Mike Eggl

BEFORE THE NORTH DAKOTA PUBLIC SERVICE COMMISSION

Susan Weflad
Kevin Cramer
Tony Clark

President
Commissioner
Commissioner

In the Matter of Wind Turbine
Decommissioning

Case No. 07-642

COMMENTS OF BASIN ELECTRIC POWER COOPERATIVE

On October 3, 2007, The North Dakota Public Service Commission published notice seeking comments on the above-referenced docket.

Basin Electric Power Cooperative (**Basin Electric**) owns and operates four wind towers, two at Minot, North Dakota and two at Chamberlin, South Dakota. Basin Electric purchases 130MW of wind power from FPLE generated from the wind projects at Edgley-Kulm, North Dakota, Wilton, North Dakota and Hyde County, South Dakota. Also, Basin Electric is in the planning stages for building an additional 115 MW of wind generation in the state of North Dakota. Based on this experience, and on our continued interest in wind generation development, Basin Electric offers the following comments.

Proposed Rule 69-09-10-03: Useful Life:

The Commission has proposed a presumption that an individual wind turbine is at the end of its useful life if the facility generated no electricity for a continuous period of twelve (12) months. Basin Electric suggests this is too short a period of time given our knowledge of the time needed for replacement parts. Replacing long lead time equipment can easily take twelve (12) months or longer. For example, in today's market, large transformers, gear boxes, and turbine blades can take over twelve (12) months today from order to delivery. Moreover, the demand for this equipment is anticipated to increase. In addition, there is a long lead time for large pieces of the construction equipment that is needed to erect and provide maintenance to wind turbines and related equipment. For example, to secure a crane often requires scheduling in excess of twelve (12) months.

Therefore, Basin Electric suggests 24 months of downtime before any presumption of the end of a "useful life" period.

Proposed Rule 69-09-10-05: Decommissioning Requirements:

The proposed requirement to reclaim the original top soil quality of an individual wind tower site would be difficult. Unlike a surface coal mine where reclamation and stockpiling of large masses of soils is involved, the multiple and small dispersed sites of a wind project would potentially require the stock piling of very small quantities of the topsoil at hundreds of sites for 25-30 years.

Basin Electric would suggest that upon decommissioning of a wind turbine site that the area disturbed be reclaimed on a best engineering practice basis with a goal of achieving comparative topsoil quality and topography.

Proposed Rule 69-09-10-08: Financial Assurance:

This proposed rule offers multiple ways in which financial assurance for the anticipated costs of decommissioning might take place. Basin Electric requests greater specify in regards to the options this assurance may be demonstrated. It is Basin Electric's preference that corporate guarantees be available to companies that meet a certain financial worthiness standard.