




Cass County Electric Cooperative

Your Touchstone Energy® Partner 

January 29, 2008

Illona A. Jeffcoat-Sacco
Executive Director, ND Public Service Commission
600 East Boulevard Ave.
Dept. 408
Bismarck, ND 58505-0480

Re: Case No. PU-07-642

Dear Ms. Jeffcoat-Sacco:

Cass County Electric Cooperative Inc. (CCEC) would like to submit the following comments to the North Dakota Public Service Commission regarding the proposed rule 69-09-10 in the above referenced case, *Decommissioning Requirements of Wind Turbines*. CCEC applauds the efforts of the commission to be proactive on this matter.

CCEC concurs with the language contained in Section 05 of rule 69-09-10 with the exception of the requirement to remove all underground cables up to a depth of 48 inches. Removal of existing underground (UD) power cables is a very expensive and questionable practice relative to the benefits realized. There are two aspects which CCEC would like the Commission to consider in its rulemaking process with regard to the aspect of underground cable removal.

With many wind power projects, there is the immediate site of the turbine(s) and then there is the adjacent area which is often times used for purposes of roads, but also as an access route for power lines to connect the turbines to the electrical grid. These adjacent areas can often times be quite expansive, especially for a large wind project. Thus the land in question can amount to a significant acreage. The language of this rulemaking does not distinguish between these two very specific areas of a project, and while there may in fact be somewhat of a grey line dividing them, CCEC believes they are readily identified with a little study.

Therefore, CCEC recommends that the Commission define the areas for decommissioning requirements as such: a) immediate project sites, and b) adjacent project sites, so as to differentiate the immediate site area of a wind turbine vs. the adjacent sites which might be used for roadways, cable and powerline routes, etc.

Regarding the installation of UD power cables, there are generally three distinct depths involved in the installation process for electrical utilities as set forth in the National Electrical Safety Code: 24 inches for cables operated at 600 volts or less (typically referred to as secondary cables); 30 inches for voltages greater than 600 volts up to 50,000 volts (typically referred to as medium voltage cables); and 42 inches for cables operated above 50,000 volts (typically referred

RECEIVED

JAN 31 2008

PUBLIC SERVICE COMMISSION

to as high voltage cables). Most underground cable used for a wind project will be of the medium voltage class for circuit lines traversing to the turbine transformer; and of the secondary class from the turbine transformer into the turbine tower. The secondary cable runs in a wind project will usually be of a very short length and should be easily recoverable.

CCEC would recommend different requirements for decommissioning a wind turbine project with regard to underground power cables between the immediate site areas and the adjacent or adjoining lands. As a utility, CCEC has concerns regarding the removal of abandoned underground power cables; it's a very time-consuming and expensive process which typically yields little if any benefit to the land. In fact, the process of removal might be more detrimental to the land than any benefit gained.

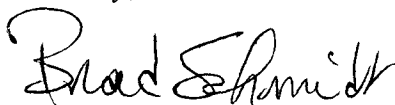
Given the fact that most reclamation work around the immediate site of a wind turbine will likely be quite extensive, CCEC has little concern with the requirement to remove electrical cables in the immediate site area, but would not recommend requiring cable removal beyond a depth of 36 inches as a matter of practicality if there is no other reclamation work beyond that depth. Again, there would be little benefit to the land reclamation process and the costs would likely be quite high.

Outside the immediate area of a wind tower site, CCEC would recommend that no requirements for removing underground cables be set forth beyond a depth of two feet (24 inches). As a matter of practice, most utilities will bury any medium or high voltage cables at a depth of about 40 inches. There are few if any known agricultural practices which would be negatively affected by cables buried at a depth of 24 inches or beyond. The present ruling requiring removal of cable buried up to 48 inches would likely result in significant unnecessary costs with little if any benefit.

Additionally, any depth requirements adopted by the Commission might well become a basis or precedent for future laws requiring the same for utilities' general underground cable installations. Given the fact that most landowners prefer underground cable installations vs. overhead, such a requirement would all but prohibit utilities from considering underground with such an open-ended liability at some point in the future. Thus, CCEC recommends minimal requirements for the removal of abandoned underground cables.

Thank you for your consideration of these comments. If we can be of further assistance, please don't hesitate to contact us at your convenience.

Sincerely,



Bradley J. Schmidt, PE
Sr. VP Trans. & Distr. Services