



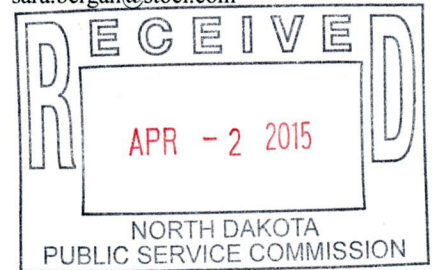
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March 30, 2015

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VIA EMAIL / REGULAR U.S. MAIL - dnitschk@nd.gov

Mr. Darrell Nitschke, Executive Secretary
North Dakota Public Service Commission
600 East Blvd., Dept. 408
Bismarck, ND 58505-0480



Re: Case No. PU-08-932
EDF Renewable Development, Inc.
Merricourt Wind Power Project
OAH #2014-0456

Dear Mr. Nitschke:

As requested at the March 19th hearing in Ashley, ND, please find late filed Exhibit 26, enclosed for electronic upload to the PUC docket in the above-referenced matter. Please be advised that late filed Exhibit 26 includes three parts: Part A: Noise and Shadow Results (with alternates on), Part B: OccHome Turbine Proximity Merricourt, and Part C: Alternate Preference List. In addition, the analysis in Part A includes all primary and alternate turbines turned on.

Very truly yours,

Stoel Rives LLP

Sara Bergan
Sarah Johnson Phillips
Andrew J. Pieper
Enclosure

cc: Wade Mann, Director (US Mail / Email wmann@nd.gov)



Noise modeling results at Merricourt for Layout v69 including alternates
Coordinates reported in UTM datum NAD83 Zone 14

Receptor ID	Easting [m]	Northing [m]	Noise [dB]
15	495120	5108250	45.73
16	490283	5105421	44.94
9	500078	5108882	43.95
17	493302	5105806	43.50
22	495757	5105037	43.28
8	498719	5109392	42.98
7	493436	5110464	42.42
5	498236	5110200	42.21
6	497191	5110317	40.91
23	492488	5104255	39.68
14	500243	5106869	37.86
25	489541	5104486	37.10
24	490239	5103986	35.93
21	497769	5104152	34.29
2	493612	5112879	32.91
1	493771	5113184	32.12
3	494256	5113407	31.54
26	497902	5102858	31.21
10	503221	5109799	31.09
4	495901	5113848	30.13
18	502098	5105119	29.32
27	500571	5102128	27.14
34	497559	5099194	25.33
13	506005	5107911	24.47
33	501205	5100191	24.23
28	504260	5102971	24.03
32	501750	5100252	23.87
42	497919	5097919	23.57
12	506625	5109337	23.45
35	501219	5098859	22.83
41	496475	5096801	22.75
20	505904	5103621	22.66
11	507698	5110376	21.80
29	506768	5102402	21.09
38	504339	5097824	20.03
39	504524	5097792	19.90
19	509583	5104876	19.45
31	507435	5100144	19.37
40	504993	5096786	18.98
30	508386	5100217	18.72
43	511145	5108851	18.44
36	508449	5099327	18.28
37	507752	5096650	17.41
44	511544	5098216	15.97
45	511147	5096893	15.71

Shadow flicker modeling results at Merricourt for Layout v69 including alternates
Results for all receptors with more than one hour of shadow flicker per year.

Receptor ID	Easting [m]	Northing [m]	Shadow flicker [hours/yr]
15	495120	5108250	26.0
8	498719	5109392	24.9
5	498236	5110200	11.3
6	497191	5110317	7.7
23	492488	5104255	6.9
7	493436	5110464	5.8
9	500078	5108882	5.3
16	490283	5105421	3.9
17	493302	5105806	3.7

Noise modeling: EDF performed noise analysis on residences within and surrounding the proposed wind farm of 75 Vestas V100-2.0 primary wind turbines (150 MW) and 8 alternate turbine locations near Merricourt, ND. All noise modeling assumptions were equal to or more conservative than the refined noise analysis previously reported by EAPC in "Merricourt 187.5 MW Wind Farm Preliminary Noise Analysis Merricourt, North Dakota."

The notable differences are that EDF has modeled the sound power levels at occupied residences at 4 m above ground level [AGL] rather than the 1.5 m AGL previously modeled. EDF also added in a 2 dB buffer to each octave band to take into account the uncertainty within the noise model and any future noise monitoring. Both these changes lead to more conservative results compare to the previous report. The results of this analysis are presented in the table.

Shadow Flicker: EDF performed shadow flicker analysis on residences within and surrounding the proposed Merricourt Wind Farm. All shadow flicker assumptions equal the refined shadow flicker analysis previously reported by EAPC in "Merricourt 187.5 MW Wind Farm Preliminary Shadow Flicker Merricourt, North Dakota." The results of this analysis are presented in the table.

As stated in the EAPC report, the home locations in question have significant wind breaks around the property, so it is likely that actual shadow flicker values would not be as high as reported in the above results.

Late Filed Exhibit 26
Part C - Alternate Preference List

List of alternate turbine locations in order of preference (highest to lowest) from the proposed Merricourt v69 Wind Turbine Layout:

- 1.) 79A
- 2.) 41A – Agreed to remove at March 19, 2015 hearing
- 3.) 37A
- 4.) 84A
- 5.) 45A – Agreed to remove at March 19, 2015 hearing
- 6.) 82A
- 7.) 78A
- 8.) 80A

Description of Alternate Preference List:

At the March 19, 2015 hearing in Ashley, EDF RD was asked to submit a late-filed exhibit ranking the company's preference with respect to the proposed alternate turbine locations. Because it is very difficult to create a comprehensive but simple preference list, EDF RD stresses that the preference list above is with respect to wind resource only and that there are other important factors to consider including geographic distribution throughout the project footprint and proximity to residences, wetlands or access to roads. Importantly EDF RD has already used its system of alternates to offer a number of changes to the layout to accommodate landowners and minimize the real or perceived effects to those landowners. At the hearing EDF RD further agreed to remove two additional alternates to accommodate a landowner.

EDF RD is committed to giving effect to the North Dakota Energy Conversion and Transmission Facility Siting Act's charge to site wind facilities in locations that minimize human and environmental impacts while ensuring continuing system reliability and integrity and ensuring that energy needs are met and fulfilled in an orderly and timely fashion. Retaining flexibility with alternate locations is critical to this endeavor as it allows EDF RD the ability to switch to an alternate location when new information about a primary location (e.g. the discovery of previously unidentified cultural resources) reveals an undesirable human or environmental impact. The remaining six (6) alternate turbine locations retain for EDF RD a small but reasonable level of flexibility in siting going forward and into construction and therefore EDF RD respectfully requests that the remaining alternate turbine locations be approved as requested.

