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November 5, 2019

Via Email and Fed Ex

Steve Kahl
Executive Secretary
North Dakota Public Service Commission
600 East Boulevard, Dept. 408
Bismarck, North Dakota 58505-0480

**Re: Merricourt Wind Project
Notice of New Cultural Sites Identified
Case No. PU-08-932 (Site Certificate No. 23)
Case No. PU-19-144 (Joint Request to Transfer from EDF to OTP)**

Dear Mr. Kahl:

Following the unintended disturbance of two cultural resources described in our October 2, 2019 filing, EDF-RE US Development, LLC ("EDF") and Wanzek Construction ("Wanzek"), which are constructing the Merricourt Wind Project, and KLJ have been coordinating to avoid additional disturbances. Otter Tail Power Company ("OTP"), as Project owner, has been continually apprised of these efforts, and has been in constant coordination with EDF.

As a part of this coordination, EDF asked KLJ to perform additional detailed cultural resource survey work. As a result of this work, KLJ identified 18 new cultural sites comprising 32 new cultural features in total.

This letter is to provide formal written notice of newly identified cultural sites within the Project footprint. KLJ's findings are outlined in more detail in Attachment A to this letter (the "KLJ Memo"). As described in the KLJ Memo, KLJ has been in contact with the State Historical Society of North Dakota ("SHSND") regarding its survey findings and informed SHSND of the most recent two newly identified features on October 31, 2019. All newly identified sites have avoidance fencing, and construction in these areas is on hold.

Additionally, KLJ, Wanzek and EDF (in coordination with OTP) are in the process of analyzing the impact to Project micrositing of these new discoveries. Any changes necessary to avoid newly identified cultural features will be reviewed with SHSND. Once the parties have obtained concurrence from SHSND on the appropriateness of any layout modifications, a layout

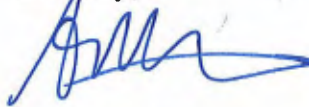
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modification filing will be filed with the Commission in accordance with certification provision 38.

Please contact Chris Sternhagen (612-486-4513; Christopher.sternhagen@edf-re.com) if there are questions or requests for additional documentation.

An original and copies of this filing are being provided via FedEx.

Sincerely,



Andrew J. Pieper
STOEL RIVES LLP
Attorneys for EDF-RE US Development, LLC

AJP:cal

Enclosures

cc: Jerry Lein
Mark Bring
Harvey McMahon
Kate O'Hair
Bradley Tollerson
Chris Sternhagen
John Papasergia
Dave Cliff
Sara Bergan

ATTACHMENT A

KLJ MEMO



October 31, 2019

EDF Renewables
10 Second Street ND Suite 400
Minneapolis, MN 55413

**Re: Merricourt Wind Power Project
New Cultural Resource Sites
PU-08-932**

To Whom it may Concern:

In attempts to greatly reduce the likelihood of disturbance to known or unknown sites, KLJ at the direction of EDF, completed an updated cultural resource clearance of the remaining unconstructed towers, access roads, and collector line corridors. The updated inventory consisted of tight intervals of 5 meters or less, particularly in areas of heavy vegetation. Several of the remaining locations had not been inventoried since 2009, and some have been grazed by cattle since the original inventories in 2009, 2013 and 2016. Many of these areas were also included in the 2013 tribal inventory.

During the inventory, 16 new sites comprising 30 new features were recorded. All of the new features are cairns or stone circles. A majority of the features were found in the now cattle grazed areas. The new sites were found generally along access roads and within tower sites.

During the week of October 20, 2019, KLJ contacted the State Historical Society of North Dakota (SHSND) State Archaeologist Andrew Clark regarding the identification of the 16 newly identified cultural resource sites on the Merricourt Wind Power Project and asked for consideration of avoidance area reductions. KLJ received correspondence on Friday, October 26, 2019 requesting the submittal of the newly recorded cultural resources to the SHSND for avoidance consideration.

In addition to this, an expanded inventory was completed around certain towers as a precautionary measure. From this inventory, 2 new sites comprising 2 new features were recorded. The new features consist of a cairn and stone circle. KLJ informed the SHSND regarding the identification of the new sites on October 31, 2019 and indicated that newly recorded cultural resource site forms are forthcoming.

Should you have any comments or questions please contact me at Andrew.robinson@kljeng.com or 701-250-5921.

Sincerely,

KLJ

A handwritten signature in black ink, appearing to read 'Andrew Robinson', with a small dot at the end of the line.

Andrew Robinson
Archeologist