



August 12, 2021

**VIA E-MAIL**

North Dakota Public Service Commission  
c/o Steven Kahl, Executive Secretary  
600 E. Boulevard Ave., Dept. 408  
Bismarck, ND 58505

**RE: Request for Extension of Time  
Glen Ullin Energy Center Case No. PU-11-662  
Bison 1 Wind Project Case No. PU-09-151  
Bison 2 Wind Project Case No. PU-11-57  
Bison 3 Wind Project Case No. PU-11-162  
Bison 4 Wind Project Case No. PU-13-127**

Dear Mr. Kahl:

In compliance with the North Dakota Century Code (N.D.C.C.) section 49-22-16.4(3), North Dakota Administrative Code (N.D.A.C.) 69-06-11-02(5), and the North Dakota Public Service Commission’s (“Commission”) Notice and Request for Status Updates in the above-referenced case numbers, ALLETE Clean Energy, Inc. and Minnesota Power, each an operating division of ALLETE (collectively “ALLETE” or “Companies”) are required to equip their five wind sites with a functioning light-mitigating technology system. The statute further states that, after a public hearing, the Commission may grant a waiver, or an extension of time, based on technical or economic feasibility considerations. By this letter ALLETE requests an extension of time to comply with the statutory deadline of December 31, 2021 for the reasons stated below.

The Companies, having wind sites adjacent to each other in Oliver, Morton, and Mercer counties, have been working together since early 2020 to develop a joint radar-based light mitigation system across both sites which will meet the December 31, 2021 deadline. Initially, the companies had hoped to employ a system using light-dimming technology, which MDU is testing at another wind site in North Dakota, however, it is our understanding that technology is not yet FAA-approved or deemed commercial, and would likely not meet the “functioning” requirement by the end of 2021.

After assessing options which are feasible to meet the requirements, the Companies have been working diligently with radar-based light mitigation supplier DeTect, since late 2020 (see Attachment A for map and design dated October 2020) to get a system designed, procured, and installed to meet the deadline. With over one year of time from the initial discussions to the statutory deadline, the project was on track for successful completion.

Recently, however, the Companies have learned that DeTect has been having issues with semiconductor supply, due to the pandemic, which has put the December 31, 2021 completion in jeopardy. The Companies have received the attached letter (Attachment B) from Hensoldt, the radar sensor supplier of DeTect, stating that they anticipate delays of product and manufacturing of radar-based systems, for the balance of 2021. In conversations with the DeTect, the Companies believe that the system can be manufactured and installation finished early in 2022, with a target date of April 30, 2022 for full in-service.

Because these delays are out of the control of ALLETE, and the Companies have worked diligently for the past year to develop a partnership to share this system across their five sites, find a reputable manufacturer, and contract with that company with sufficient time to design and install this system, the Companies are seeking from the Commission an extension of time for full installation and in-service of this system. The proposed target date of April 30, 2022 aligns with the feedback from the supplier for receipt of needed semiconductors, and full installation of this system.

As requested in the August 2, 2021 Notices from the Commission to the Companies, the Companies will provide monthly updates on the status of this project, beginning September 2021. Thank you for your consideration of this request. If you have any questions, or need additional information, please contact me at 218-723-3963 or [dmoeller@allete.com](mailto:dmoeller@allete.com).

Yours truly,



David R. Moeller  
*Senior Attorney and  
Director of Regulatory Compliance*

DRM:th  
Attach.



# Attachment B

*Glen Ullin Wind Energy Center and Bison Wind Energy Center ADLS Supplier explanation for project delay*



28<sup>th</sup> July 2021

To whom it may concern

**HENSOLDT UK**

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Dear Sirs

**Impact of global semiconductor supply chain challenges**

As you may be aware, the impact of the global COVID-19 pandemic has been felt within manufacturing generally and has had a particularly marked impact upon the manufacturing of semiconductors.

This has led to a significant disruption of the supply chain, both within the semiconductor industry and its many and varied customer industries. There have been many reports of automotive manufacturers having to temporarily suspend manufacturing operations, for weeks at a time, as a consequence of an inability to obtain supplies of the semiconductors needed to provide the numerous digital systems contained within modern vehicles.

Their requirements are for thousands of chips a week and they are reliant upon direct supply from the semiconductor manufacturers, whereas our modest requirements are typically sourced through electronic component distributors.

This provides us with an opportunity to seek supplies from alternative sources, in the event that our normal distributor is unable to fulfil our order, due to a lack of deliveries from the manufacturer. In turn, this agility has helped us to maintain our production, although not necessarily at the planned level.

Consequently, we are experiencing some constraints on our ability to meet customer's required delivery dates.

It is our expectation that this will remain the situation for at least the balance of this year, as the semiconductor manufacturers seek to maximise the volume of devices produced, from their available capacity. The natural impact of this volume focus is that they are concentrating on devices used in vehicles, telecommunications and consumer electronics, potentially at the expense of lower volume, more specialist markets, such as our own.

We sincerely apologise for any disruption caused by any delays that you may experience in the fulfilment of your orders and assure you that we are continuing to explore every appropriate avenue to maintain/increase our build schedule.

Your faithfully

**For Kelvin Hughes Limited, trading as HENSOLDT UK**



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