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October 18, 2021

Via Hand Delivery & Electronic Mail

Mr. Adam Renfandt
Analyst, Public Utility Division
North Dakota Public Service Commission
600 E. Boulevard, Dept. 408
Bismarck, ND 58505-0480
arenfandt@nd.gov
ndpsc@nd.gov

In re: Tatanka Wind Power, LLC
Decommissioning
Case No. PU-10-073
Our File No. 010268-000001

Dear Mr. Renfandt:

I am writing on behalf of Tatanka Wind Power, LLC (“Tatanka”), a subsidiary of Acciona Wind Energy USA LLC, in regard to Tatanka’s April 2021 Updated Decommissioning Plan and Cost Estimate filed as Docket No. 13, as supplemented (hereinafter the “April 2021 Plan”). The purpose of this correspondence is to provide the Commission with an update regarding Tatanka’s planned decommissioning financial assurance for the facility. Tatanka previously filed a proposed decommissioning cash escrow schedule to meet the Commission’s decommissioning financial assurance requirements. In consideration of subsequent feedback from the Commission and staff, upon approval of Tatanka’s April 2021 Plan, Tatanka will subsequently file a decommissioning bond with the Commission for the full amount of the April 2021 Plan, \$8,878,377.00. Tatanka anticipates the process to secure a bond will take approximately 60 days. Through this commitment, Tatanka believes it has fully addressed the Commission’s concerns with respect to its previously proposed cash escrow.

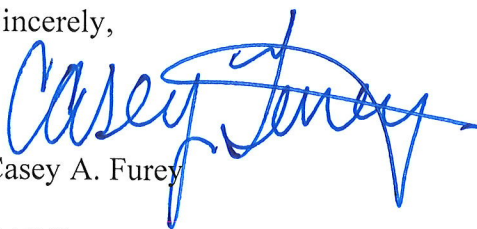
Tatanka believes it has also addressed the Commission’s prior concerns regarding potential fiberglass debris from the felling by incorporating the use of a mobile crane. Discussion regarding the use of the hybrid felling and mobile crane methodology is contained in Tatanka’s supplement filed as Docket No. 17. Additionally, as part of its April 2021 Plan, Tatanka has agreed to increase the depth of removal of turbine foundations from three to four feet, consistent with requirements for new facilities. As previously explained, Tatanka’s decommissioning cost estimate contains a contingency for potential additional costs and includes estimated costs for county road repairs.

These lines items demonstrate comprehensive nature of the April 2021 Plan and are not otherwise required under the Commission's rules.

Tatanka has engaged with the Commission and Commission staff over the past year to reach a viable solution to bring the facility in to compliance with the Commission's decommissioning rules, and thanks the Commission and Commission staff for its time and efforts throughout this process. As explained in prior filings, the Tatanka Wind Farm commenced commercial operations in December 2008; however, it was not until July 2020 that the Commission adopted rules expressly requiring decommissioning financial assurance for non-sited wind facilities. Because these particular rules were not adopted until almost twelve years after the facility started operating, financial assurance obligations totalling multi-millions of dollars were not built into the project's cost modeling assumptions during initial planning and were not contemplated in its financial arrangements. Nonetheless, the above commitments demonstrate Tatanka's good-faith efforts to comply with the Commission's rules while reasonably maintaining the financials necessary to support operations and promote project longevity.

For the above-reasons, Tatanka respectfully requests the Commission approve the April 2021 Plan. Please feel free to contact me with any questions.

Sincerely,



Casey A. Furey

CAF/lh