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December 9, 2021

Via Electronic Mail & Hand Delivery

Mr. Steve Kahl
Executive Director
North Dakota Public Service Commission
600 E. Boulevard, Dept. 408
Bismarck, ND 58505-0480
ndpsc@nd.gov

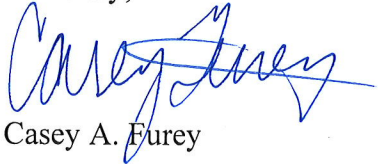
In re: Tatanka Wind Power, LLC
Decommissioning Plan – Proposed Order
Case No. PU-10-073
Our File No. 010268-000001

Dear Mr. Kahl:

Please find enclosed for filing in the above-referenced matter eight copies of the proposed order regarding the revised decommissioning plan.

Please feel free to contact me with any questions.

Sincerely,



Casey A. Furey

CAF/lh
Enc.

cc: Brian Johnson (via email)
Adam Renfandt (via email)
Emilie Beavers (via email)

25 PU-10-73 Filed 12/09/2021 Pages: 5
Proposed Order regarding Revised Decommissioning Plan
Tatanka Wind Power, LLC
Casey Furey, Crowley Fleck, PLLP

STATE OF NORTH DAKOTA
PUBLIC SERVICE COMMISSION

Tatanka Wind Power LLC
Tatanka Wind Farm, Dickey County
Decommissioning

Case No. PU-10-073

Proposed Order

December __, 2021

Procedural History

1. On April 14, 2021, Tatanka Wind Power LLC (“Tatanka”) filed a decommissioning plan and cost estimate with the Commission for the Tatanka Wind Project (the “Project”). The Project straddles the North Dakota/South Dakota border in Dickey County, North Dakota and McPherson County, South Dakota. The North Dakota portion of the Project has a nameplate capacity of 91.5 megawatts (“MW”) and consists of 61-1.5 MW wind turbines. The Project began commercial operations in 2008. Tatanka proposes utilizing the felling methodology for wind turbine removal.
2. On May 18, 2021, the Commission held an informal hearing to discuss the request in the Commission Hearing Room, 12th Floor, State Capitol, Bismarck, North Dakota.
3. On June 6, 2021, Tatanka filed supplemental information regarding the felling methodology in response to discussion at the May 18 informal hearing.
4. On July 1, 2021, the Commission held a work session to further discuss the request.
5. On September 21 and October 18, 2021, Tatanka filed supplemental information in support of its proposal.
6. On October 20, 2021, the Commission approved a motion rejecting Tatanka’s April 14, 2021 filing and recommended Tatanka refile with additional information.
7. On November 12, 2021, Tatanka filed a revision to its April 14, 2021 decommissioning plan and cost estimate (the “November 2021 Plan”) containing additional information requested by the Commission.
8. On December 2, 2021, the Commission held a work session to discuss the November 2021 Plan.

Discussion

9. Tatanka engaged consultant Westwood to evaluate estimated decommissioning costs utilizing the felling (or pulling) methodology to dismantle wind turbines. At the May 18, 2021 informal hearing, Tatanka's consultant Westwood appeared and provided additional details regarding the felling methodology. Westwood explained advancements in technology and methodology have caused the felling technique to gain popularity in recent years.

10. Tatanka provided information explaining felling has successfully been used to remove turbines with 80 to 90-meter hub heights, tip heights ranging upwards of 450 to 500 feet, and for turbines with generating capacities ranging between one-megawatt MW to 2.3 MWs. The size and generating capacity of Tatanka's turbines (1.5 MW & 80-meter hub height) are consistent with the size range of turbines in which the felling method has been utilized.

11. Tatanka submitted the November 2021 Plan in response to the Commission's October 20, 2021 regular meeting. The November 2021 Plan consolidates various information Tatanka previously filed with the Commission, and includes additional information requested by the Commission regarding compaction and use of the felling method by industry on prior projects.

12. Tatanka proposes utilizing the felling methodology to remove wind turbines. Tatanka proposes to also use a truck mounted mobile crane to remove turbine blades and the hub assembly. The mobile crane can utilize existing access roads and turbine pads to remove turbine components. After the blades and hub are removed, the turbine tower components would be felled. Use of a truck mounted crane eliminates concerns of potential fiberglass impacts from felling turbines with blades attached.

13. Tatanka proposes to fell turbine towers by lowering towers on to adjacent access roads to eliminate potential impacts to surrounding cropland and pasture. The November 2021 Plan provides that turbines can be felled in very precise locations because the hinge formed with the cutting torches restricts the direction the turbine can fall. The turbine nacelle is also connected, via a cable, to a piece of heavy equipment which pulls the turbine tower in the intended direction. The turbines can be felled accurately so they fall on the adjacent access roads, which are slightly wider than the nacelles and towers. Felling towers on adjacent access roads eliminates surface impacts otherwise associated with the use of large crawler cranes to traverse a project landscape to remove turbines. Access road removal and restoration includes decompaction activities regardless of the method used for turbine removal. The November 2021 Plan discusses best management practices for decompaction of access roads.

14. The elimination of the use of large cranes also reduces the number of trucks delivering and removing equipment and associated dust impacts. Felling eliminates the need for crane crossings of public roads and the associated temporary road closures and potential for damage to the public roads from the crossings.

15. The felling methodology is potentially safer than utilizing large industrial cranes because it minimizes safety risks by reducing the amount of workers exposed in the immediate vicinity of turbine removal. Felling minimizes the amount of individuals exposed to the dangers of assembling and breaking down the large cranes, and the exposure to tower pieces and nacelles as they are hoisted from their assembled positions and lowered to the ground.
16. The Project is required to remove facility foundations, buildings and ancillary equipment to a depth of three feet. N.D. Admin. Code § 69-09-09-05(1)(c)(1). This requirement increases to a depth of four feet for facilities constructed on or after July 1, 2017. N.D. Admin. Code § 69-09-09-05(1)(c)(2). Tatanka has voluntarily committed to increase its depth removal requirement from three to four feet consistent with the requirement for newly constructed facilities.
17. The November 2021 Plan voluntarily accounts for estimated costs associated with anticipated impacts to local roads and repairs. The estimate also includes a voluntary 10% contingency on top of anticipated estimated costs to cover potential cost variances. Together, these items total \$1,761,076.00 in additional costs Tatanka has voluntarily included in the November 2021 Plan.
18. The November 2021 Plan provides that Tatanka will notify the Commission, the Dickey County Commission, and applicable landowners of the intended decommissioning activities and schedule.
19. The November 2021 Plan includes a proposed safety protocol containing a detailed task list to promote worker safety.
20. The November 2021 Plan excludes anticipated offsets from salvage value.
21. The November 2021 Plan is signed and stamped by a licensed North Dakota engineer.
22. Tatanka has committed to submitting financial assurance for the decommissioning cost estimate set forth in the November 2021 Plan of \$9,478,100.00, in the form of a bond within 60 days of the Commission's approval of the November 2021 Plan.
23. The November 2021 Plan complies with the Commission's requirements for decommissioning plans and cost estimates set forth in the Commission's decommissioning rules under N.D. Admin. Code Ch. 69-09-09.

Therefore, the Commission makes the following:

Order

1. Tatanka's November 12, 2021 Decommissioning Plan and Cost Estimate is **APPROVED**.
2. Tatanka shall file financial assurance for the November 12, 2021 decommissioning cost estimate of \$9,478,100.00 in the form of a bond within 60 days of service of this Order.

PUBLIC SERVICE COMMISSION

Brian Kroshus
Commissioner

Julie Fedorchak
Chair

Randy Christmann
Commissioner