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October 21, 2020

VIA U.S. MAIL AND ELECTRONIC MAIL

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

**Re: Project: Minnkota Power Cooperative, Inc.
Infinity Wind Project/Valley City
Case No: PU-10-100**

**Project: Minnkota Power Cooperative, Inc.
Infinity Wind Project/Petersburg
Case No: PU-10-100**

Dear Mr. Kahl:

Enclosed for your consideration are one original and eight copies of the revised Minnkota Power Cooperative, Inc. supplement request for waivers pursuant to N.D. Admin. Code Section 69-09-09-10.

Should you have any questions please contact the undersigned. Thank you.


With regards,

A handwritten signature in blue ink, appearing to read "Andrew C. Sorbo", is written over a long, thin blue horizontal line that spans across the width of the page.

Andrew C. Sorbo
Senior Manager Legal and Property

Encl.



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**Minnkota Power Cooperative, Inc.
Infinity Wind Project/Valley City**

Case No. 10-100

**Minnkota Power Cooperative, Inc.
Infinity Wind Project/Petersburg**

SUPPLEMENT TO PETITION FOR WAIVER

October 21, 2020

Minnkota Power Cooperative, Inc. (Minnkota) operates two (2) wind turbine generators that comprise Minnkota's "Infinity Wind Project". The Infinity Wind Project turbines are located east of Petersburg, ND, along U.S. Highway 2, and east of Valley City, ND, along Interstate 94.

Each wind turbine has a capacity of 900 kW (.9 megawatts). The turbine near Petersburg meter data started October 24, 2001, with the first kWh produced July 12, 2002, and the turbine near Valley City meter data started January 22, 2002, with the first kWh produced July 12, 2002.

The requirements in Case No. PU-10-100, specifically North Dakota Administrative Code (NDAC) sections 69-09-09-03, 69-09-09-06, and 69-09-09-08 include an annual filing of a certificate of operation, periodically updated decommissioning plans, and requirements for financial assurance.

NDAC 69-09-09-10 provides for a waiver of this chapter for the annual certificate of continuing operations, updated decommissioning plans, and financial assurance requirements so long as the wind energy conversion facility is designed for or capable of generating no more than five megawatts of electricity for facilities that fall within 69-09-09-03, 69-09-09-06 or 69-09-09-08. It appears that this chapter would allow for a waiver of the above-referenced sections as Minnkota's Infinity Wind Project facilities do not generate in excess of five megawatts of electricity.

In order to effectuate a reduction in administrative costs borne by the Public Service Commission ("Commission") and by Minnkota when working through the annual certification process, periodically updating the decommissioning plan, and the process of verifying and securing adequate financial assurance, all processes include gathering of information, creation and filing of the appropriate certifications, plans and assurances, in addition to the Commission's review of such documents, Minnkota requests a waiver of the requirement to file such Certification, a waiver to the requirement of filing an updated decommissioning plan and a waiver to the requirement of providing ongoing financial assurance. These waivers will save avoidable costs for both the Commission and Minnkota.

For the reasons set forth above, we respectfully request the Commission give consideration to granting the requested waivers in accordance with NDAC 69-09-09-10.

Respectfully,



Andrew C. Sorbo
Senior Manager Legal and Property