



October 1, 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: Additional Information in Advance of Public Hearing
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 advance of the North Dakota Public Service Commission's ("Commission") hearing noticed for October 13, 2021 in the above-referenced case numbers, Minnesota Power and ALLETE Clean Energy (collectively "ALLETE" or "Companies") provide some additional information for the Commission's consideration. In regards to the question on the timing of implementation Light-Mitigating Technology System, the Companies recognized in 2018 that there were two different technologies that may satisfy the intent North Dakota Century Code (N.D.C.C.) section 49-22-16.4(3). The two technologies consisted of Light Intensity Dimming System ("LIDS") and Aircraft Detection Lighting System ("ADLS").

Upon researching both of these systems, it appeared to the Companies that LIDS had advantages over ADLS for a variety of reasons. LIDS was not approved by the Federal Aviation Administration ("FAA") at the time of researching both systems. It was the Companies understanding that Technostrobe (LIDS provider) was pursuing FAA approval for the LIDS technology.

The primary reasons for waiting for the LIDS technology to be available are the following:

- 1) LIDS appeared to be more feasible based on the following: sensors mounted on nacelle mitigated the need for a radar and would eliminate the radar footprint and reduce environmental impact as a result.
- 2) Shorter implementation time: no need for trenching and excavation.
- 3) Easier to maintain: less equipment needed, no special parts or equipment needed (i.e., radar).

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- 4) Less intrusive on landowners and the environment: radar not needed, less excavation, less road construction and less vegetation disruption.
- 5) More expedient implementation of LIDS vs. ADLS.

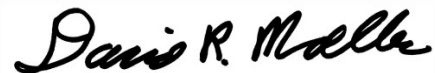
The Companies will have representatives at the public hearing who can address questions related to this selection and the overall timing and consideration.

In addition, as discussed in our August 12, 2021 extension request, the Companies have been working diligently with radar-based light mitigation supplier DeTect, since late 2020 to get a system designed, procured, and installed. That close coordination has continued and the wind facilities are being readied for the installation of the system as soon as it will be available. Furthermore, the supply chain and chip issues that the Companies are facing are not unique to DeTect, but are facing a plethora of industries. For example, in the September 30, 2021 Wall Street Journal, there was an extensive article about the effect of chip shortages on the automobile industry. See: <https://www.wsj.com/articles/car-companies-buckle-up-for-extended-chip-shortage-11633005657>

The Companies appreciate the Commission's expedited review and consideration of our extension request and want to ensure the Commission we will fully comply with this requirement.

If you have any questions, or need additional information, please contact me at 218-723-3963 or dmoeller@allete.com.

Yours truly,



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

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