

SUNFLOWER WIND PROJECT, LLC

c/o Onward Energy Holdings, LLC
767 Third Ave, 17th Floor New York, NY 10017

September 1, 2021

VIA ELECTRONIC FILING: NDPSC@ND.gov

Mr. Patrick Fahn
Director, Public Utilities Division
North Dakota Public Service
Commission State Capitol Building
600 East Boulevard Avenue, No.
408 Bismarck, North Dakota
58505-0480

RE: Case No. PU-14-105 – Sunflower Wind Project, LLC – Aircraft Detection Lighting System

Dear Mr. Fahn:

In response to your letter dated August 2, 2021 to Casey A. Furey, Crowley Fleck PLLP concerning a request for a status update on the required aircraft lighting system upgrades at the Sunflower Wind Project located in Hebron, Sunflower Wind Project, LLC (“Sunflower”) is providing this initial status update to you.

Please note that Sunflower Wind Project, LLC is not currently being represented by Crowley Fleck PLLP and that future correspondence should be directed to Onward Energy at the address indicated below. Onward Energy has been the owner of the Sunflower wind farm since COD in late 2016. Onward is currently operating and managing a 4 GW portfolio of wind, solar and thermal power generation assets (refer to www.onwardenergy.com for more company information).

Raul Garcia, Sr. Director Asset Management
Sunflower Wind Project, LLC
c/o Onward Energy Management, LLC
767 Third Avenue, 17th Floor
New York, NY 10017

Sunflower is aware of the requirements of North Dakota Century Code (“NDCC”) section 49-22-16.4(3) and the present deadline of December 31, 2021 for the Sunflower wind farm to have in place a functioning light mitigating technology system. Sunflower has been diligently working to meet this goal as well as examining our options for requesting an extension based on technical and/or economic feasibility considerations.

Sunflower is making every effort to implement the most reliable option in the shortest amount of time, but as the Public Service Commission is aware, there are many factors to consider when implementing this technology including cost, reliability, effectiveness, availability, and technical implementation.

The Sunflower wind farm was constructed using Vestas turbine technology in 2016 as well as all of the other six wind farms that Onward Energy currently owns and operates. Two of the three wind sites that Onward Energy owns in Maine have the Vestas-supplied O.C.A.S. radar-controlled lighting system. If a radar-controlled option turns out to be the only option that the Sunflower wind farm can implement, then the Vestas system would likely be our first choice given current synergies with our wind portfolio. Unfortunately, our experience with failures in the radar-controlled systems to date leads us to question whether this would be a wise investment and accomplish the underlying intent of North Dakota's legislation. At our Maine sites, the system has suffered long term failures (longer than 1 year) which at one site required large additional unplanned capital outlays before it could be operated reliably. The better reliability as well as initial and long-term costs of the alternative L.I.D.S. system manufactured by Technostrobe would be a much better fit for the project. Unfortunately, use of this system is contingent on FAA approvals, which approvals are expected but appear to be taking longer than were anticipated.

We plan to request an informal conference to discuss these and other issues related to implementation of a solution that meets the requirements of N.D.C.C. section 49-22-16.4(3).

Sincerely,

Sunflower Wind Project, LLC

By:  _____

Name: Bruce Kerr

Title: Authorized Signatory