SUNFLOWER WIND PROJECT, LLC

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

October 4, 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 Status update

Dear Mr. Fahn:

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 continues to diligently work to implement the most reliable light mitigating system 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.

As was reported in our earlier update, 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. Our informal inquiries about other radar-based light-mitigating systems does not induce confidence that they are any more reliable or effective. The better reliability, as well as lower 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 extension to the current deadline for Sunflower Wind Project later in October.

Sincerely,

Sunflower Wind Project, LLC

By: _____

Name: Bruce Kerr
Title: Authorized Signatory