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**FABYANSKE
WESTRA
HART &
THOMSON**

May 7, 2015



North Dakota Public Service Commission
Attn: Executive Secretary
600 E. Blvd., Dept. 408
Bismarck, ND 58505-0480

Re: Dickinson Wind, LLC, Case Nos. PU-15-111 and PU-15-133

Dear Sir/Madam:

Enclosed for filing in the above-referenced matter is the Concerned Citizens of Stark County's ("CCSC") Petition to Intervene. CCSC opposes Dickinson Wind's application for a Certificate of Site Compatibility because CCSC believes that the proposed Dickinson Wind Energy Center does not promote the public health, safety, or welfare of the citizens of Stark County. CCSC therefore requests that its Petition to Intervene be granted so that CCSC can substantively participate in the upcoming hearing currently scheduled for **May 18, 2015**.

Pursuant to N.D.C.C. § 69-02-02-05, I have enclosed the original Petition to Intervene, along with seven copies thereof. By copy of this letter, I am serving same by certified mail to Melissa Hochmuth, a representative of Dickinson Wind, LLC.

Very truly yours,

Matthew T. Collins

MTC/JJD
Enclosure

cc: Melissa Hochmuth, Esq. (via certified mail)
Client

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Petition to Intervene
Concerned Citizens of Stark County (CCSC)
Matthew T. Collins, Attorney

16 PU-15-111 Filed 05/07/2015 Pages: 3
Petition to Intervene
Concerned Citizens of Stark County (CCSC)
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STATE OF NORTH DAKOTA
NORTH DAKOTA PUBLIC SERVICE COMMISSION
600 E. Boulevard, Dept. 408
Bismarck, ND 58505-0480

Julie Fedorchak
Randy Christmann
Brian P. Kalk

Chairman
Commissioner
Commissioner

Dickinson Wind, LLC
150 MW Wind Energy Center – Stark County
Siting Application

Case No. PU-15-111

Dickinson Wind, LLC
230 kV Transmission Line – Stark County
Siting Application

Case No. PU-15-133

PETITION TO INTERVENE

Pursuant to North Dakota Century Code (“N.D.C.C.”) § 69-02-02-05, the Concerned Citizens of Stark County (“CCSC”), through undersigned counsel, hereby respectfully petition the North Dakota Public Service Commission (the “Commission”) to intervene in the above-captioned docket. CCSC files this Petition to Intervene in order to preserve its ability to participate substantively in this proceeding at the public hearing currently scheduled for **May 18, 2015**.

CCSC is a North Dakota nonprofit corporation dedicated to preserving the growing and thriving economies of Richardton, Taylor and Gladstone. The members of the board of directors of CCSC are all residents of and property owners in Stark County. This petition should be granted because the outcome of this proceeding will bind or affect the members of CCSC, their communities, and their property rights. Furthermore, CCSC’s interests are not adequately represented by the other parties currently participating in this docket.

Dickinson Wind, LLC (“Dickinson Wind”), a wholly-owned indirect subsidiary of NextEra Energy Resources (“NEER”), submitted an application for a Certificate of Site Compatibility for the construction and operation of the Dickinson Wind Energy Center in Stark County. After reviewing


Dickinson Wind's application, CCSC believes that the application does not comply with North Dakota law nor the applicable Stark County ordinances. Among other things, CCSC believes that the proposed Dickinson Wind Energy Center does not promote the public health, safety, or welfare of the citizens of Stark County. As such, CCSC opposes Dickinson Wind's application for a Certificate of Site Compatibility.

The approval of a Certificate of Site Compatibility for Dickinson Wind will have a substantial impact on the members of CCSC. The proposed wind farm will, among other things, directly impact residential development in Stark County; property values of non-participating property owners, including CCSC members; the wildlife and environment of Stark County; and the health and quality of life of Stark County residents. Given these concerns, it is anticipated that CCSC's participation in this proceeding will bring valuable and necessary perspectives to light as the Commission considers Dickinson Wind's application. Furthermore, granting this Petition to Intervene will not adversely impact this proceeding. CCSC will be prepared to appear at the upcoming hearing on May 18, 2015.

For the reasons stated above, CCSC respectfully requests that its Petition to Intervene be granted.

DATED: May 7, 2015

**FABYANSKE, WESTRA, HART & THOMSON,
P.A.**

By: 

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**ATTORNEYS FOR CONCERNED CITIZENS
OF STARK COUNTY**