Enel North America, Inc.

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Memorandum to the North Dakota Public Service Commission

This memorandum is intended to provide the North Dakota Public Service Commission with an update regarding the Aircraft Detection and Lighting System (ADLS) for the Aurora Wind Project owned by Aurora Wind Project, LLC and the Lindhal Wind Project owned by Lindahl Wind Project, LLC.

Currently, a single centrally located ADLS tower, manufactured and installed by Terma is intended to provide coverage for both wind power facilities. Enel is experiencing challenges in achieving full functionality of the ADLS. Aurora Wind operates both Vestas V110 and Nordex V149 turbines while Lindahl Wind operates Vestas V100 turbines. Since November 2023, the Vestas turbines have been communicating with the ADLS system, but there are issues that are preventing the Nordex turbines from communicating with the ADLS system.

Efforts are ongoing to identify and resolve the issues affecting the full functionality of the ADLS. Full functionality is believed to be primarily affected by:

- Cybersecurity standards: Corporate cybersecurity standards and North American Electric Reliability Corporation (NERC) reliability and security standards may restrict communication between specific devices (e.g., turbines and Terma ADLS tower). Aurora Wind and Lindahl Wind are engaged with the ADLS and turbine manufacturers on this item.
- Network connectivity between different manufacturer technologies: Several third-party technologies must be integrated for the system to function as intended (e.g., turbine SCADA, FAA lighting and Terma ADLS radar). At Aurora there are some challenges integrating these different systems.

Aurora Wind and Lindahl Wind remain committed to resolving the outstanding ADLS issues and are working with third-party manufacturers and internal Subject Matter Experts (SMEs) to that end. It is estimated that the issue will be resolved before the end of the year. In the interim, any time ADLS communication fails for either the Vestas or Nordex turbine model, the FAA lights installed on that turbine model revert to operating in failsafe mode. Failsafe mode includes the continuous synchronized flashing of the lights, in accordance with FAA standards, maintaining air traffic and human safety. Enel also has on-site technicians and staff that undertake operational monitoring and maintenance activities as well as 24 hour remote facility monitoring. Other health, safety and environmental protocols (e.g., Emergency Response Plan) are in place to maintain the safe operation of the Aurora and Lindahl facilities.

Aurora Wind and Lindahl Wind have not communicated directly with landowners regarding the ADLS issues to date, but will undertake to communicate with concerned landowners going forward. Aurora Wind and Lindahl Wind are also undertaking revisions to how the ADLS daily reports are stored and

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managed. In the past, older reports submitted digitally to Aurora Wind and Lindahl Wind were over written by newer reports. As part of typical operational activities these reports will be more regularly uploaded to a permanent data storage location.