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Bismarck, ND 58501  
701-222-7900

November 3, 2020

Executive Secretary  
North Dakota Public Service Commission  
State Capitol Building  
Bismarck, ND 58505-0480

Re: Case Nos. PU-15-592, PU-17-192  
and PU-20-417  
Light Mitigation Time Extension

Montana-Dakota Utilities Co. (Montana-Dakota) herewith electronically submits information requested at the Informal Hearing held October 21, 2020. The Company requested information regarding Light Intensity Dimming Solution (LIDS) technology from the vendor. The information is included as Attachment A. A second fact sheet summarizing LIDS technology is included as Attachment B.

In addition, the Company is providing a link for a video containing additional information. Please see <https://lidsinfo.com/en/video>. The video demonstrates the lighting intensity differences.

Montana-Dakota also provides the recent operating results for hours of operations under each lighting intensity for the Mont Saint Marguerite Wind Farm, a Canadian operation, that utilizes LIDS technology as summarized in the table below.

100% Intensity	38%
30% Intensity	3%
10% Intensity	59%
	<hr/>
	100%

The Company requested information regarding software maintenance. The Aircraft Detection Lighting Systems (ADLS) annual maintenance fee includes a component for software maintenance. LIDS technology does not require software maintenance.

If you have any questions regarding this filing, please contact me at (701) 222-7855 or [travis.jacobson@mdu.com](mailto:travis.jacobson@mdu.com).

Sincerely,

*/s/ Travis R. Jacobson*

Travis R. Jacobson  
Director of Regulatory Affairs

Attachments

# Attachment A



**Never alone in the dark.**

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# WHY DO WE NEED LIGHTS?

## FAA & TC justification for 2,000 cd Worse Case Scenario



Visibility

1.6 km (5,249')



**Design Speed**

165 knots (190 mph)

**Aircraft Turning Lag**

1.3 km (4,265 ft)

**Required**

**Avoidance Distance**

0.6 km (2,000 ft)

L-864 (Red Beacon)

2,000cd



**Acquisition Distance**

1.9 km (6,234 ft)

CL-810 (Red Marker)

32cd

**Acquisition Distance**

1 km (3,280 ft)

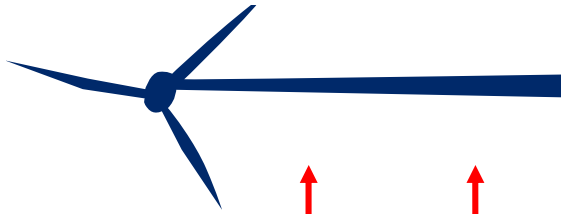


**Aircraft Turning Lag**

1.3 km (4,265 ft)



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LIDS™ (Lighting Intensity Dimming Solution)

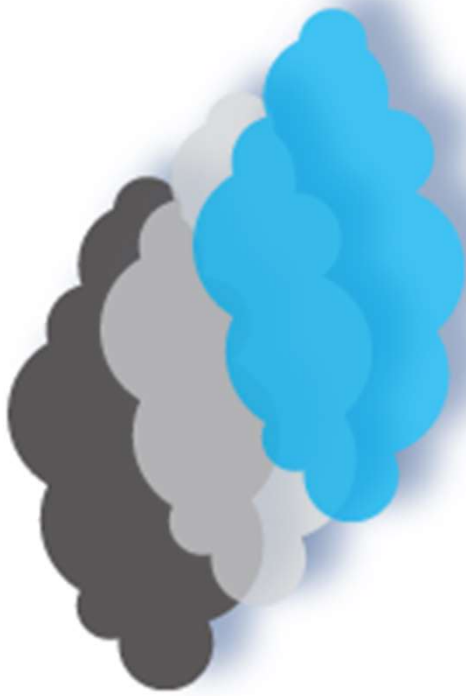


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□ Light Intensity Dimming Solution **LIOS™**

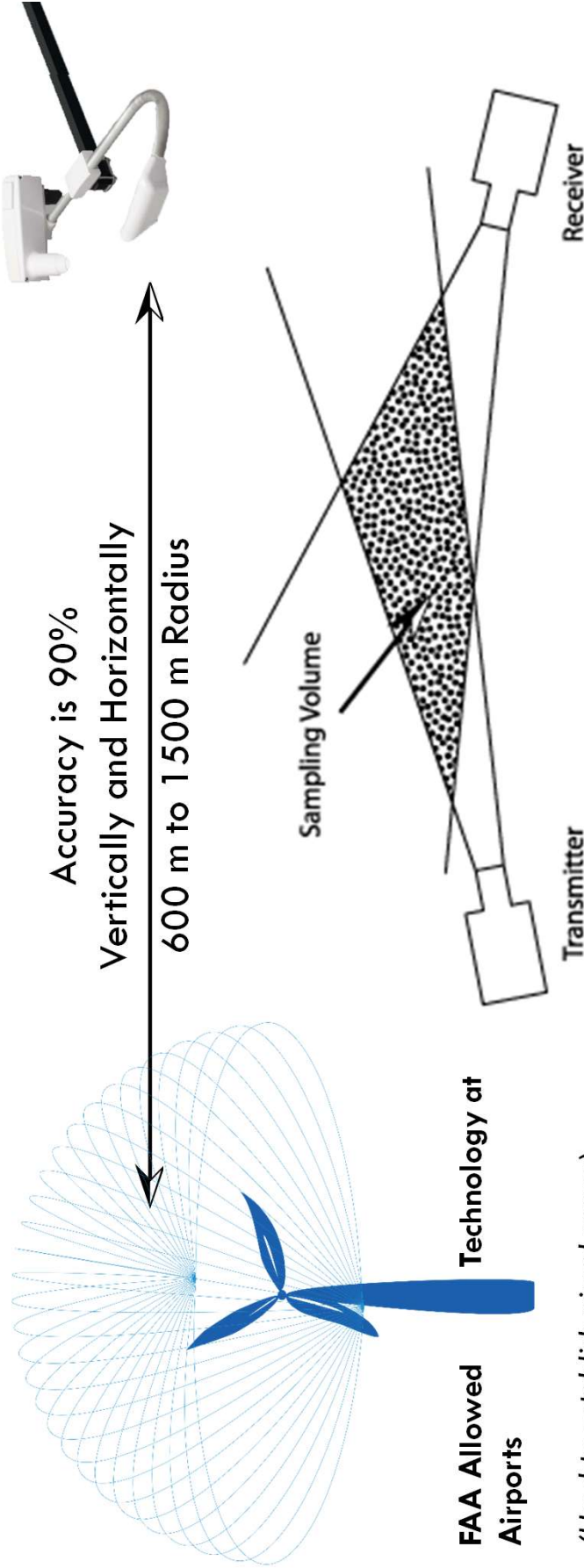


Visibility	Light	DIM THE LIGHT
1.6km	2,000 cd	
5km	600 cd	
10km	200 cd	



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□ What is the technology – how does it work?



**FAA Allowed Airports**

*(Used to establish visual range)*  
**FAA-E-2772B 3.1.2.2 Visibility Sensor (VS)**

The science involved in determining visibility with the sensor we are using is the **Forward Scatter Principle.**



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# Attachment B



# LIDS<sup>TM</sup> Technology

## Dim the light

## See wind farms in a whole new light

Obstruction lights on wind farms are necessary for the safety of pilots and travelers. When at maximum intensity, the lights facilitate navigation during the worst visibility conditions. However, under clear skies, the lights can be too bright for the purpose they serve. Thanks to LIDS<sup>TM</sup> Technology, light intensity can now be tailored to suit the surrounding visibility. And that's good news for everyone. In the air, and on the ground.



**TECHNO STROBE<sup>TM</sup>** See the Light

[technostrobe.com](http://technostrobe.com)

Combines visibility measuring devices with LED lighting equipment.

LIDS<sup>TM</sup> Technology is a trademark of Technostrobe inc. 2016. All rights reserved.

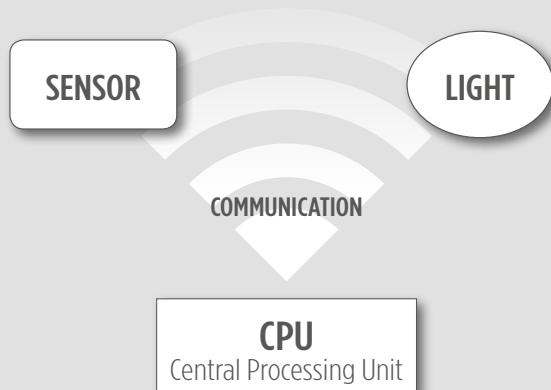
## LIDS<sup>TM</sup> Technology. Community-friendly dimming solutions.

**The Context.** The presence of obstruction lights on tall towers is necessary for the safety of both pilots and travelers. These lights are set to flash at a maximum intensity to provide pilots with the necessary guidance when navigating through the worst possible visibility conditions - all night, all year round.

**The Solution.** LIDS<sup>TM</sup> Technology now provides a means of tailoring the intensity level of the lights on a wind farm in accordance with the surrounding visibility. The purpose of the solution is to dim the lights under clear sky conditions. In fact, under great visibility conditions (10 km of visibility or more), the intensity of the lights is reduced by 90 percent.

**The Result.** Using this leading-edge technology can help developers obtain a greater level of community acceptance for their projects.

## LIDS<sup>TM</sup> Technology



### Features

- Safe, simple, effective and cost efficient
- Proven technology
- Manufactured by wind industry experts in lighting and meteorology
- Web interface can provide feedback to the community in real time

Constructed by



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