

At the hearing for the Brady Wind Energy Center on March 30, 2016, the Commissioners asked Brady Wind to investigate alternatives to red flashing lights for compliance with FAA lighting procedures. Brady Wind responds as follows:

Brady Wind is aware that there are Aircraft Detection and Lighting Systems (“ADLS”) available that use radar to detect aircraft and other airborne objects within a defined range. As such systems are designed, once an aircraft or object is detected in the defined range, the lights are activated, but only for as long as the object remains within the range. The FAA issued an Advisory Circular in December, 2015 to provide performance standards for these types of systems (attached).

While the FAA has completed testing and reporting on one ADLS, this remains a relatively new technology. In fact, two other ADLS are currently in the FAA testing/reporting process and there is at least one other ADLS that has been developed but has not undergone FAA testing. Another project affiliate of NextEra Energy Resources, LLC (“NEER”) installed an ADLS at a wind site in Arizona in 2012 but has yet to operate it because the FAA only recently approved its use. NEER’s affiliate will begin operating the ADLS in Arizona shortly. Another NEER affiliate plans to install a similar ADLS at another wind project in Texas

Brady Wind has evaluated the feasibility of installing an ADLS in lieu of traditional aviation lighting at Brady Wind and has identified concerns with installing such a system. First, given that the system was approved by the FAA only a month ago, Brady Wind has concerns as to how the novel and relatively untested ADLS would affect its insurance requirements and coverage. Further, Brady Wind did not include the cost of ADLS in the Brady project estimate and PPA pricing because to date it has not been a requirement of the FAA or the Commission. The cost of an ADLS varies based on number of turbines, project area, topography, and other variables, but Brady Wind estimates the cost to install to be over \$1 million, plus ongoing maintenance, testing, and certification. Finally, because the scheduled commercial operation date of the project is December, 2016, Brady Wind is concerned that fully evaluating the ADLS option, obtaining bids, and installing the system will extend beyond that time, costing the project many millions of dollars as a result.

Despite these concerns, Brady Wind understands the Commission’s interest in this new technology and its potential to lessen the visual impact of wind turbines on the landscape. Therefore, Brady Wind commits to make efforts to install an ADLS at the Brady Wind Energy Center in strict compliance with the FAA rules and guidelines.

Because Brady Wind is making this significant scope change so close to its expected commercial operation date of October 2016, we request flexibility from the Commission as to the in-service date of the ADLS. Brady Wind will use commercially reasonable efforts to install the ADLS concurrently with construction of the wind farm, but if additional time is required to install the ADLS, Brady Wind requests the ability to operate the wind farm with traditional lighting for a period of two years, until December 31, 2018, and then phase in the ADLS, or some other suitable technology.