



**COMMENTS OF BASIN ELECTRIC POWER COOPERATIVE**  
**Public Service Commission Public Utilities - Wind Decommissioning Rulemaking**  
**Case No. PU-17-23**

Basin Electric Power Cooperative (**Basin Electric**) is a regional, consumer-owned, generation and transmission cooperative formed in 1961 to supply supplemental power to a consortium of rural electric distribution cooperatives. Basin Electric's core business is generating and delivering electricity to wholesale customers, primarily our member systems. As of the end of 2016, Basin Electric owns 4,015 megawatts (**MW**) and operates 5,003 MW of electric generating capacity including coal, wind, natural gas, and nuclear. Basin Electric supplies 141 rural electric member cooperative systems with wholesale electric power who in turn serve approximately 3 million consumers in a nine-state area.

Basin Electric respectfully submits the following comments to the Public Service Commission on Case No. PU-17-23. Our comments are related to North Dakota Administrative Code chapter 69-09-09 regarding Wind Decommissioning Administrative Rules. Our comments are regarding two sections within 69-09-09, section 04 and section 09.

The revision in 69-09-09-04 from eight months to 12 months is suggested to allow for any weather delays or concerns within a given timeframe and allow for circumstances that could arise with delays due to severe snowfall, or abnormal rainfall occurrences.

The suggested revisions in 69-09-09-08 relate to the rating category where the occurrence of an "A minus" rating would be allowable within the "A" category, as well as for situations where a split rating occurs among more than one rating organization, thus allowing for the commission to accept the higher of the organization's ratings.

Our specific draft requests are outlined below in red:

**69-09-09-04. Decommissioning period.**

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The facility owner or operator shall begin decommissioning ~~a commercial wind energy conversion facility or wind turbine~~ within ~~eight~~**12** months after the time the facility ~~abandonment or turbine reaches~~ the end of its useful life, ~~as determined in section 69-09-09-03.~~ Decommissioning must be completed within ~~eighteen~~ **twenty-four** months after the ~~facility abandonment or turbine reaches~~ the end of its useful life unless the commission approves a plan specifying the steps and schedules to return the facility to operation.

**69-09-09-08. Financial assurance.**

**Pages 9 and 10 Section 4. b. (1)**

(1) A current rating in the "A" category or higher for its most recent bond issuance as issued by Moody's Investors Service, Standard and Poor's Corporation, or an equivalent rating by any other nationally recognized statistical rating organization, as defined and approved by the United States securities and exchange commission, that is acceptable to the commission. If an organization has different ratings among various rating organizations, the commission shall accept the higher of the ratings.

Again, Basin Electric appreciates the opportunity to comment and welcomes additional dialogue and conversations with the commission regarding these and any other administrative issues.