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October 10, 2017

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VIA FEDERAL EXPRESS

Darrell Nitschke
Executive Secretary
North Dakota Public Service Commission
State Capitol
600 East Boulevard
Bismarck, North Dakota 58505-0480



**Re: Northern States Power Company
Advance Prudence – 1550 MW Wind Portfolio
Application
Case No. PU-17-120
OAH Case No. 20170229**

Dear Mr. Nitschke:

On behalf of Northern States Power Company, doing business as Xcel Energy, enclosed for filing with the North Dakota Public Service Commission in the above referenced Case, please find an original and ten (10) copies of the following documents:

1. Applicant's proposed Findings of Fact, Conclusions of Law, and Order; and
2. Applicant's Exhibit 13 - Bat and Avian Survey.

Please feel free to contact me with any questions or concerns.

Sincerely,

BRIGGS AND MORGAN, P.A.

/s/ Zeviel T. Simpser

Zeviel T. Simpser

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Late filed Exhibit NSP-13 - Bat and Avian Survey

Northern States Power Company
Zeviel Simpser, Briggs & Morgan P.A.

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ZTS/ts
Enclosures

cc: (via email)
 ALJ Patrick Ward
 Illona Jeffcoat-Sacco
 Mitch Armstrong
 Jack Schuh
 Jerry Lein
 Pat Fahn
 Victor Schock
 Sara Cardwell

Exhibit 13

Xcel Energy's Avian and Bat Mitigation Strategy

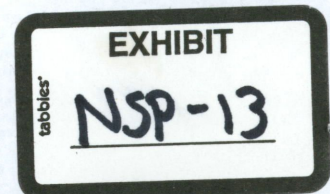


Although wind power generation results in many environmental benefits, wind farms do have the potential to impact wildlife such as avian and bat species. And while there currently is no device or equipment that can reliably and safely deter birds and bats from flying in and around a wind farm, Xcel Energy takes a number of steps to minimize negative impacts on birds, bats, and other wildlife around our operations. We summarize those practices below.

During the site selection process, Xcel Energy works with wind developers, the U.S. Fish and Wildlife Service, and other state and local wildlife or natural resource agencies to ensure that wind farms (and the individual turbines comprising those farms) are appropriately located. We follow the U.S. Fish and Wildlife Service's Land-based Wind Energy Guidelines and conduct multiple surveys and studies to make sure turbines are not located in critical habitat areas, especially for population-sensitive, threatened, and endangered species. We typically will undertake at least 1-2 years of survey work to assess avian and eagle use in the area of a proposed wind farm before a single turbine is installed.

Once a wind farm is built, we continue to monitor and perform studies to confirm that wind turbine operations are not unreasonably impacting birds and other wildlife populations. For all of our new wind farms, we develop a Bird and Bat Conservation Strategy, which provides a framework for how we will minimize impacts over the life of a project—from planning to construction to the operation and maintenance and decommissioning. These plans have become an industry standard, and we are now in the process of developing them for our older wind farms as well.

The Conservation Strategy sets out impact minimization measures related to the siting, construction, and operation of a wind farm. During construction, for example, the Conservation Strategy may dictate buffer zones around certain nests and require that construction activities take place outside of avian nesting periods, to the extent practicable. It may also limit the removal of perennial vegetation and require the planting of native species during restoration activities. Operational measures might include the minimization of high-intensity lights on the turbines (except those required for safety by the FAA or other purposes), which can attract birds. Measures



may also be taken to regularly and promptly remove road kill or other animal carcasses in the vicinity, which attract raptors and other scavengers. Operational measures can also be species specific. For instance, for bats, measures may include limiting turbine operation in low-wind speed conditions during fall bat migration season. With regard to eagles, turbines may be curtailed during nesting season if an eagle constructs a nest within a certain distance from an operating turbine. Xcel Energy is also supporting research into advanced technologies that are designed to automatically curtail a turbine if an eagle is detected within a certain number of meters from a turbine.

Each Bird and Bat Conservation Strategy is unique to the particular wind farm at issue, and the measures taken at one farm may be different from those taken at another. This exhibit is intended to provide a high-level summary of Xcel Energy's efforts to mitigate the impacts of wind projects on wildlife. Should the Commission wish to review the specific Bird and Bat Conservation Strategies for the self-build wind farms at issue in this case (Freeborn, Foxtail, and Blazing Star I & II), we would be happy to provide those to the Commission once final.