

**COMMENTS OF BASIN ELECTRIC POWER COOPERATIVE
Public Service Commission - Wind Energy Conversion Facility Lighting Systems
Case No. PU-17-339**

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-17-339. Our comments are related to the proposed North Dakota Administrative Code chapter 69-06-11 regarding Wind Energy Conversion Facility Lighting Systems. Our comments are regarding section 03 within 69-06-11.

This rule would retroactively apply to the PrairieWinds ND 1 project owned by Basin Electric located south of Minot. This project went online in late 2009 and consists of 77 turbines that generate approximately 120 MW of wind energy.

As proposed in the new Chapter 69-06-11-03, the Federal Aviation Administration has to approve any lighting system on all wind projects. That same approval and process is required when an existing lighting system is either modified or replaced. That approval is done on a case-by-case basis and takes a minimum of 90-120 days for approval (FAA Information).

Further complicating this process for Basin Electric is the fact that the PrairieWinds 1 project surrounds a ballistic missile base that includes a helicopter pad, and is within close proximity to the Minot Air Force Base, therefore changing the lighting system on this project also requires approval from the U.S. Air Force. To address that requirement we would suggest the following amendment:

69-06-1-03. Service, Maintenance, Safety, and Lighting System Standards.

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Each light-mitigating technology system must be installed, operated, and maintained in accordance with United States Department of Transportation Federal Aviation Administration regulations [14 CFR 1.1 et. Seq] in effect as of [date of publishing rules] and receive Federal Aviation Administration, or any other federal agency with regulatory authority, approval prior to implementation.

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