

September 27, 2018

VIA FEDERAL EXPRESS

Mr. Darrell Nitschke
Executive Secretary
North Dakota Public Service Commission
600 E. Boulevard, Dept. 408
Bismarck, ND 58505-0480



**RE: Aurora Wind Project, LLC's Consolidated Application for a Certificate of Corridor Compatibility and Route Permit for the Aurora Wind Project Transmission Line in Williams and Mountrail Counties, North Dakota
Case No. PU-18-___**

Dear Mr. Nitschke:

Aurora Wind Project, LLC, respectfully submits herewith an original and ten (10) copies of the following documents in connection with the above-referenced matter:

1. Application for Waiver or Reduction of Procedures and Time Schedules (separate original; copies included in consolidated application); and
2. Consolidated Application For a Certificate of Corridor Compatibility and Route Permit for the Aurora Wind Project Transmission Line.

Also enclosed are three CDs: (1) a CD containing electronic copies of this letter and the above-referenced documents; (2) a CD containing public GIS data; and (3) a CD containing cultural resource GIS data (which is non-public). A check in the amount of \$75,000.00 for the filing fee required pursuant to North Dakota Century Code, Section 49-22-22 is also enclosed.

By copy of this letter, the Williams County Auditor and the Mountrail County Auditor are being served with a copy of the enclosed documents in accordance with North Dakota Administrative Code, Section 69-06-05-01(4). An Affidavit of Service on the county auditors is also enclosed.

If you have any questions, please let me know.

Sincerely,

A handwritten signature in cursive script that reads "Mollie M. Smith".

MOLLIE M. SMITH

MMS/64882983
Enclosures

cc: Dave Iadarola
Jennifer Dean
Justin Bailey
Beth M. Innis, Williams County Auditor
Stephanie Pappa, Mountrail County Auditor

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF NORTH DAKOTA

IN THE MATTER OF THE APPLICATION
OF AURORA WIND PROJECT, LLC, FOR A
CERTIFICATE OF CORRIDOR
COMPATIBILITY AND ROUTE PERMIT
FOR THE AURORA WIND PROJECT
TRANSMISSION LINE IN WILLIAMS
COUNTY AND MOUNTRAIL COUNTY,
NORTH DAKOTA

CASE NO. PU-18-_____

**Application of Aurora Wind Project, LLC,
for Waiver or Reduction of Procedures and Time Schedules**

In connection with its submission of a consolidated application for a Certificate of Corridor Compatibility and Route Permit (“Consolidated Application”) for the construction of an approximately 20-mile long 345-kilovolt (kV) transmission line and associated facilities, located in Williams County and Mountrail County, North Dakota (the “Project”), Aurora Wind Project, LLC (“Aurora Wind”), submits to the North Dakota Public Service Commission (“Commission”) this application for a waiver or reduction of procedures and time schedules set forth in Chapter 49-22 of the North Dakota Century Code (“N.D.C.C.”) and Article 69-06 of the North Dakota Administrative Code (“N.D.A.C.”). In accordance with N.D.C.C. § 49-22-07.2 and N.D.A.C. Ch. 69-06-06, Aurora requests that the Commission waive the following requirements:

1. The requirements to hold a separate hearing on a waiver request, a Certificate of Corridor Compatibility (“Corridor Certificate”) application and a Route Permit application, as may be required by N.D.C.C. §§ 49-22-07.2, 49-22-08, 49-22-08.1, and 49-22-13 and N.D.A.C. § 69-06-01-02. Aurora Wind requests that the Commission hold a single consolidated hearing on this waiver request and Aurora

Wind's Consolidated Application. Aurora Wind also requests that the Commission shorten the three-month period specified in N.D.C.C. § 49-22-08(5), and the six-month period specified in N.D.C.C. § 49-22-08.1(5).

2. The requirements of N.D.C.C. §§ 49-22-08 and 49-22-08.1 insofar as these sections may require the separate filing of applications for a Corridor Certificate and a Route Permit, and insofar as they require separate publication of notices for said applications.

Consistent with the N.D.A.C. § 69-06-06-01(2), Aurora Wind provides the following information in support of its waiver requests:

A. Description of Proposed Project.

1. **Type:** The Project is a 345-kilovolt ("kV") transmission line and associated facilities. Aurora Wind also plans to construct a Wind Project, which will have a nameplate capacity of up to 300 megawatts ("MW"). The Project will convey power from the planned Wind Project substation to the point of interconnection to the grid at the existing Basin Electric Power Cooperative Tande 345 kV Substation ("Tande Substation"). Aurora Wind is submitting a separate application to the Commission for a Certificate of Site Compatibility for the proposed Wind Project.

The transmission line will be constructed using steel monopole structures with spans of approximately 600-900 feet. The permanent right-of-way for the transmission line will be up to 150 feet wide, and additional temporary workspace will be needed in certain locations during construction.

Other temporary facilities will be required for the construction phase of the Project, including laydown areas for equipment and construction management facility, intersection

improvements to facilitate over-length turning, crane paths and working pads, and staging areas for transmission structure delivery.

2. **Product:** The Project will convey power from the planned Wind Project substation to the point of interconnection to the grid at the existing Tande Substation.

3. **Capacity and Design:** The Project will require installation of a 345 kV transmission line. The transmission line will include steel mono-pole structures with spans of approximately 600-900 feet. The conductor will likely be a single-bundled, aluminum-clad, steel-reinforced line with optical ground wire mounted at the top for communication purposes between the Wind Project substation and the Tande Substation. The Project design includes a shield wire, which will be strung at the top of the poles to provide lightning protection. The shield wire will also contain a fiber optic core that forms part of the communications system for the transmission line, allowing for monitoring and remote control of interconnection facility components.

4. **Location:** The proposed Project is approximately 20-miles in length, with approximately 17 miles in Williams County and approximately 3 miles in Mountrail County. The Project Route is within a 150-foot corridor ("Project Corridor"), totaling 364 acres. Maps showing the location of the proposed Project are provided in Appendix A of the Consolidated Application.

5. **Geographical Service Area:** As noted above, the Project is located in Williams County and Mountrail, North Dakota, and will convey power from the planned Wind Project substation to the point of interconnection to the grid at the existing Tande Substation.

6. **Time Schedule:** Aurora Wind proposes to develop the Project on the following schedule:

- **Land Acquisition:** With the exception of land managed by the North Dakota Department of Trust Lands (to be acquired following issuance of a Certificate and Route Permit), all land that is proposed to house the Project Corridor is subject to Easement Agreements that have been acquired by Aurora Wind for the Project.
- **Certificate and Route Permit:** Aurora Wind anticipates filing the application for the Certificate and Route Permit in Third Quarter 2018 and anticipates issuance by the Commission in First Quarter 2019.
- **Mountrail County Conditional Use Permit (“CUP”):** Aurora Wind filed the CUP application in May 2018. Mountrail County issued a CUP in June 2018.
- **Williams County Conditional Use Permits:** Aurora Wind filed an application for a CUP with Williams County in May 2018. Williams County issued a CUP in July 2018.
- **Other Permits:** Aurora Wind will acquire all other permits necessary for construction of the Project prior to conducting the work for which the permit is required. Please refer to Table 7-1, Potential Permits/Approvals in Section 7.0.
- **Equipment Procurement, Manufacture and Delivery:** Aurora Wind will order the transmission conductor cables and other items with long-lead times as soon as practical following issuance of the Certificate and Route Permit.
- **Construction:** Construction is scheduled to begin as early as Second Quarter 2019 and be completed by December 2020.
- **Commercial Operation:** Aurora Wind anticipates commercial operation to begin once the Wind Project is complete, no later than end of 2020.

7. **Future Plans:** Aurora Wind has no specific plans for additions to or modifications of the Project at this time.

8. **Need for the Facility and Alternatives Considered.**

The need for the Project is driven by the need to interconnect the proposed Wind Project to the electric grid. As described in the application that is being filed for the associated Wind Project, Aurora Wind’s substation was located to minimize power loss from the collection system in order to allow for efficient collection of generated power from the turbines. Aurora

Wind identified the proposed point of interconnection at the existing Tande Substation as the only viable point of interconnection that does not trigger significant upgrades throughout the existing transmission system in the area. The Project is needed to facilitate the interconnection, as there is no existing infrastructure connecting the wind project to the transmission grid.

The Project Route is the only viable alternative to interconnect the Wind Project to the grid based on landowner preferences and avoidance of existing infrastructure. Further, the Project Route follows and is the most direct route that also minimizes impacts on the exclusion, avoidance, selection, and policy criteria identified in NDAC Section 69-06-08-02.

For additional analysis of the need for the proposed Project, including a discussion of the alternatives analysis, please see Section 2.0 of the Consolidated Application, which accompanies this waiver application.

9. **Ten Year Plan.**

The Project is consistent with Aurora Wind's Ten Year Plan for 2018-2028, which was filed with the Commission on June 29, 2018.

10. **Cost.**

The estimated total cost to construct the Project is \$15 million dollars.

B. Waiver Request.

Aurora Wind requests that the Commission grant the waivers requested herein because these waivers are needed to prevent potentially significant delays to the Project. As noted above, the Project is needed to convey power from the Wind Project to the point of interconnection at the existing Tande Substation. In turn, the power transported by the Project will help meet area demand for electricity resulting from ongoing oil and gas activities in the Bakken and the region's homes and businesses.

N.D.C.C. § 49.22-07.2 provides that the Commission may waive procedures and time schedules upon a finding that “the proposed facility is of such length, design, location, or purpose that it will produce minimal adverse effects.” Based upon the investigation and analysis set forth in Aurora Wind’s Consolidated Application, granting the waivers requested is appropriate because the proposed facility will produce minimal adverse effects due to its length (approximately 20 miles), its design (utilization of the most current technologies that minimize impacts to the environment, as well as siting based on landowner preferences and avoidance of existing infrastructure), its location (located in rural Williams County and Mountrail County, North Dakota, avoiding Exclusion and Avoidance Areas, as set forth in N.D.A.C. § 69-06-08-02, and interconnecting to existing infrastructure in an area where transmission lines already exist), and its purpose (conveyance of power to the electric grid).

In determining whether the proposed Project will result in adverse impacts on the environment, Aurora Wind evaluated the impacts of the Project considering the exclusion and avoidance areas, the selection criteria, and the policy criteria set forth in N.D.A.C. § 69-06-08-02 and the factors set forth in N.D.C.C. § 49-22-09. Impacts associated with the Project, and mitigation measures that will be taken with respect to said impacts, are summarized in Sections

