

Ruso Wind Partners, LLC
Ruso Wind Project and Gen-Tie Line Project
Docket Nos. PU-19-28/PU-19-29

**Late-Filed Exhibit No. 53 – Ruso Wind Partners, LLC’s Position Regarding
Reducing Shadow Flicker to 30 Hours or Less Per Year at Receptor 41**

At the public hearing, the Commission requested information on what actions Ruso Wind Partners, LLC (“Ruso Wind”) would take to limit shadow flicker to 30 hours or less per year at non-participating Receptor 41. Following the public hearing, Ruso Wind modeled a nearby turbine location (Alternate Turbine No. T-63) with a GE-2.5-116 model turbine, rather than the larger rotor diameter turbine models used in prior modeling.¹ The result was that modeled shadow flicker at Receptor 41 was reduced to less than 30 hours per year. Please see Updated Shadow Flicker Results provided with Late-Filed Exhibit No. 49. If Alternate Turbine No. T-63 is constructed, Ruso Wind will use either a GE-2.5-116 model turbine or a GE-2.3-116 (which would have less potential shadow flicker impact than the GE-2.5-116) so as to limit shadow flicker at Receptor 41 to 30 hours or less per year.

Additionally, with the removal of turbines T12, T13 and T14 per discussions with the Minot Air Force Base (*see* Late-Filed Exhibit No. 51), Ruso Wind has confirmed that shadow flicker at Receptor 28 (a participating residence for which Ruso Wind has a shadow flicker waiver) will also be reduced to 30 hours or less per year. Note that the updated shadow flicker modeling results provided in Late-Filed Exhibit No. 49 do not include this information, as those modeling results were obtained before removal of turbines per the Minot Air Force Base discussions.

¹ The GE-2.5-116 model (90-meter hub height) is estimated to have a greater potential shadow flicker impact than the GE-2.3-116 model (80-meter hub height).