

Casey A. Furey  
100 West Broadway, Suite 250  
P.O. Box 2798  
Bismarck, ND 58502-2798  
701.223.6585  
cfurey@crowleyfleck.com

November 20, 2019

*Via Hand Delivery and Electronic Mail*

Mr. Steve Kahl  
Executive Director  
North Dakota Public Service Commission  
600 E. Boulevard, Dept. 408  
Bismarck, ND 58505-0480

*E-mail: ndpsc@nd.gov*

**In re: Ashtabula Wind, LLC  
Ashtabula Wind I, LLC  
Expedited Joint Transfer Applications  
PU-19-336 & PU-19-345  
Our File No. 035218-000052**

Dear Mr. Kahl:

The following information is provided on behalf of Ashtabula Wind, LLC and Ashtabula Wind I, LLC (collectively, the "Applicants") in response to an information request received by Commission staff. The Applicants have filed Expedited Joint Transfer Applications for the transfer of Certificate of Site Compatibility No. 7 (Case No. PU-19-336) and Certificate of Corridor Compatibility No. 104 and Route Permit 114 (Case No. PU-19-345) from Ashtabula Wind, LLC to Ashtabula Wind I, LLC. Both Ashtabula Wind, LLC (the current project company) and Ashtabula Wind I, LLC (the new project company) are indirect, wholly owned subsidiaries of NextEra Energy Resources, LLC.

As stated in both transfer applications, the transfer requests are occurring to facilitate a tax equity financing transaction associated with the repowering of the Ashtabula I Wind Energy Center. As a part of this transaction, the tax equity financing counterparty (the investor) requires that the repowered wind generation and transmission assets be transferred into a new project company. This is a common requirement of investors in financing transactions related to repowers, because it allows them to invest in newly created project companies. The creation of the new project company (Ashtabula Wind I, LLC), and transfer of all existing assets with the addition of the new equipment that is used for the repower of the turbines, allows for a new project company to own the assets. The new project company will continue to operate the Wind Energy Center and Transmission Line as they are operated today; the transfers are an internal reorganization only.

Please feel free to contact me with any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Casey A. Furey', with a long horizontal flourish extending to the right.

Casey A. Furey

cc: Adam Renfandt (via email)  
Patrick Fahn (via email)  
Tracy Davis (via email)