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July 27, 2021

Executive Secretary  
North Dakota Public Service Commission  
State Capitol Building  
600 E. Boulevard Ave. #408  
Bismarck, ND 58505-0480

***Re: Application to Request Extension of Time for Wind Energy Conversion Facility Lighting Mitigation - Thunder Spirit Case No. PU-17-192***

Montana-Dakota Utilities Co. (“Montana-Dakota” or “Company”) herewith electronically submits to the Commission an update on Wind Energy Conversion Facility Lighting Mitigation for the Thunder Spirit Wind Facility.

Montana-Dakota filed an Application to Request Extension of Time (Application) to install light mitigating technology for its Thunder Spirit wind energy conversion facility pursuant to North Dakota Administrative Rules 69-06-11-02.2 on October 5, 2020. The Application was requested based on economic considerations to allow the Company to install Light Intensity Dimming Solutions (LIDS) technology which would result in a lower cost to customers than the currently approved technology, Aircraft Detection Lighting System (ADLS). On October 21, 2020 an informal hearing was held to discuss the Application. On February 17, 2021 the Commission granted the Company’s request.

Unfortunately, LIDS technology is still under review and pending approval by the Federal Aviation Administration (FAA). At this time, the FAA has not announced an approval date, nor has it made any level of commitment to the approval of LIDS. Montana-Dakota intends on planning, purchasing, and installing ADLS to ensure compliance with the deadline set forth by the extension granted by the Commission. This decision was made after considering the extension deadline, LIDS pending approval by the FAA, and an ongoing microchip shortage that is affecting production of key electronic components associated with ADLS technology. The current ADLS equipment timeline requires a lead time of 12 to 14 months. Therefore, the Company made a decision regarding ADLS to allow for sufficient time to meet an installation date of December 31, 2022.

Montana-Dakota has received a firm bid in the amount of \$1.75 million for the ADLS equipment and installation. This is less than previous estimates of \$3.0 to 3.3 million. The main driver in the reduced cost is a reduced equipment requirement. Initially, the Company's vendor included two radar units in its price quote due to the terrain and elevation of the Thunder Spirit wind energy conversion facility. After additional review, it has been confirmed only one radar unit is required.

Montana-Dakota appreciates the Commission's consideration of the LIDS technology solution as a way to more economically serve customers. However, due to the lack of FAA approval, the Company must now commit to the ADLS technology to meet the Order's required installation date of December 31, 2022.

Please feel free to contact me at 701.222.7855 or [travis.jacobson@mdu.com](mailto:travis.jacobson@mdu.com) if you have any additional questions.

Sincerely,

/s/ **Travis R. Jacobson**

Travis R. Jacobson

Director of Regulatory Affairs

#### Attachments

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