

June 30, 2022

**VIA E-MAIL AND FEDERAL EXPRESS**

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

**RE: Rolette Power Development, LLC's Ten Year Plan for 2022-2032  
Case No. PU-22-\_\_\_\_\_**

Dear Mr. Kahl:

Enclosed for filing are two copies of the following documents:

1. Rolette Power Development, LLC's Ten Year Plan: 2022-2032;
2. Notice of Filing Ten Year Plan: 2022-2032; and
3. Certificate of Service.

Electronic versions of the above-referenced documents and this letter were filed with the Commission today via e-mail. If you have any questions, please let me know.

Sincerely,



MOLLIE M. SMITH

MMS/bd/76479214

Enclosures

cc: Lloyd Anderson (via e-mail, w/ enclosures)  
Beth Berge (via e-mail, w/ enclosures)

1 PU-22-276 Filed 06/30/2022 Pages: 13  
2022 - 2032 Ten Year Plan  
Rolette Power Development, LLC  
Mollie Smith, Fredrikson&Byron, P.A.

**STATE OF NORTH DAKOTA**  
**PUBLIC SERVICE COMMISSION**

**Case No. PU-22-\_\_\_\_**

**IN THE MATTER OF THE FILING OF A TEN  
YEAR PLAN BY ROLETTE POWER  
DEVELOPMENT, LLC**

**CERTIFICATE OF SERVICE**

Mollie M. Smith, being first duly sworn, does depose and state that on June 30, 2022, she served the following document:

**Ten Year Plan: 2022-2032**

by placing a true and correct copy of said document in an envelope addressed as follows:

Ms. Valerie McCloud  
Rolette County Auditor  
102 2nd Street NE, P.O. Box 939  
Rolla, ND 58367

and depositing the same, with postage prepaid, in the United States mail at Minneapolis, Minnesota.



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Mollie M. Smith

**TEN YEAR PLAN: 2022-2032**  
**Rolette Power Development, LLC**

**June 2022**

In accordance with N.D.C.C. § 49-22-04 and N.D.A.C. Ch. 69-06-02, Rolette Power Development, LLC (“Rolette Power”), submits the following Ten Year Plan for years 2022 through 2032.

- (1) A description of the general location, size, and type of all facilities to be owned or operated by the utility during the ensuing ten years, as well as those facilities to be removed from service during the ten-year period.

Rolette Power is a North Dakota limited liability company, and is owned jointly by M-Power, LLC, and Border Power, LLC, also North Dakota limited liability companies. Rolette Power is developing an up to 100.4 megawatt (“MW”) energy conversion facility known as the Rolette Wind Energy Project (“Project”) located south and west of the City of Rolette in Rolette County, North Dakota. On July 7, 2020, Rolette County issued a Conditional Use Permit (“CUP”) for the Project. On November 18, 2015, the North Dakota Public Service Commission (“Commission”) issued Findings of Fact, Conclusions of Law and Order (“Order”) granting Certificate of Site Compatibility No. 46 to Rolette Power for the Project (*see* Case No. PU-15-124).

A specific point of interconnection to the grid has not yet been identified. However, the Project may potentially interconnect to the grid at the following locations: (1) the Rugby-Glenboro 230 kilovolt (“kV”) transmission line owned by Otter Tail Power Company (“OTP”); (2) the Rolette-Rugby 115 kV transmission line owned by OTP; or (3) the Rolette 115 kV Substation owned by Western Area Power Administration. A 230 kV or a 115 kV generation-interconnection transmission line between two and six miles in length will need to be constructed to interconnect the Project to the grid, depending on which point of interconnection is selected. The specific location of and design details regarding such a transmission facility will be determined at a future date. Rolette Power plans to move forward with Project construction once an off-taker and interconnection point have been identified.

Other than the Project and potentially an associated generation-interconnection transmission line, Rolette Power does not own or operate, or have plans to construct, own, or operate, any generation or transmission facilities. The Project and any associated transmission line have an estimated life of greater than 10 years. As such, Rolette Power does not plan to decommission any transmission or generation facilities within the next ten years.

- (2) An identification of the location of the tentative preferred site for all energy conversion facilities and the tentative location of all transmission facilities on which construction is intended to be commenced within the ensuing five years and such other information as may be required by the commission. The site and corridor identification shall be made in compliance with the criteria published by the commission pursuant to section 49-22-05.1.

As noted above, the Project footprint is located south and west of the City of Rolette, North Dakota, in Rolette County. The specific location of any generation-interconnection transmission line has not yet been determined, but Rolette Power would obtain the necessary approvals for the route selected.

As set forth in the Order, the location of the Project complies with the Commission's siting criteria, including the exclusion and avoidance area criteria referenced in N.D.C.C. § 49-22-05.1 and identified in N.D.A.C. Ch. 69-06-08. Maps of the Project's designated site, and additional detail regarding the Project site, are provided in Case No. PU-15-124.

- (3) A description of the efforts by the utility to coordinate the plan with other utilities so as to provide a coordinated regional plan for meeting the utility needs of the region.

Rolette Power commissioned studies to determine which regional utilities may have a need for the wind energy capacity produced by the Project, and to identify various options for transmitting the Project's output from the Project site to the identified utilities' respective loads. The studies have assisted Rolette Power in identifying potential off-takers, as well as in its efforts to coordinate selection of the best option(s) for delivering the Project's output to the destination(s) designated by the ultimate off-taker(s).

Rolette Power has also initiated discussions with other parties who may potentially benefit from the Project, depending upon the ultimate transmission interconnection selection. As discussed above, in any of the scenarios currently under consideration, only a relatively short transmission line would be required between the Project collection substation and the point of interconnection to the transmission grid. When plans are finalized, Rolette Power will apply to the applicable transmission system operator for further study of the intended interconnection.

- (4) A description of the efforts to involve environmental protection and land-use planning agencies in the planning process, as well as other efforts to identify and minimize environmental problems at the earliest possible stage in the planning process.

Rolette Power employed a qualified environmental consulting firm to study and identify avoidance and exclusion areas within the Project site, in accordance with N.D.C.C. Ch. 49-22 and N.D.A.C. Ch. 69-06-08. As noted above, Rolette County issued a CUP for the Project on July 7, 2020, and the Commission issued Certificate of Site Compatibility No. 46 for the Project on November 18, 2015 (*see* Case No. PU-15-124). Throughout Project development, Rolette Power has consulted with applicable local, state, and federal agencies and entities, and will continue to do so, as appropriate.

Additional information regarding Rolette Power's agency and entity contacts, and efforts to identify and minimize any potential environmental issues, is provided in Case No. PU-15-124.

- (5) A statement of the projected demand for the service rendered by the utility for the ensuing ten years and the underlying assumptions for the projection, with that information being as geographically specific as possible, and a description of the manner and extent to which the utility will meet the projected demands.

Rolette Power plans to sell the energy produced by its proposed Project to one or more utilities that need additional renewable energy in order to comply with state and/or, if applicable, federal renewable energy goals and objectives.

Locally, in 2021, the North Dakota Legislature enacted a statutory provision adopting a low-emission technology initiative, which establishes a goal that the “agricultural, forestry, natural resources, and working land of the United States should provide energy from low-emission technology and continue to produce safe, abundant, and affordable food, fuel, feed, and fiber.”<sup>1</sup> As used in this initiative, low-emission technology includes, among others, wind. Additional renewable resources will be needed to meet the low-emission technology initiative.

Also, in 2010, the North Dakota Department of Commerce, EmPower ND Commission, published the Comprehensive State Energy Policy 2010-2025, which recommended a capacity of wind generation up to 5,000 MW by 2020.<sup>2</sup> The state had a total of 3,989 MW of installed wind capacity at the end of 2020.<sup>3</sup> With improving technology and falling costs, utilities are beginning to include renewable energy projects in their resource plans as long-term economic energy and capacity resources. In North Dakota, excellent wind resources create high capacity factor generation, reducing the cost/megawatt hour (“MWh”). In general, alternative energy sources provide lower costs per MW-hour than conventional sources.<sup>4</sup>

A need also exists for renewable energy produced in North Dakota to meet state renewable portfolio standards. Eleven of the MISO states currently have either mandated or voluntary renewable portfolio standards or policies.<sup>5</sup> Under current state standards, total United States renewable portfolio standard demand will increase from 310 terawatt hours (“TWh”) in 2019<sup>6</sup> to

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<sup>1</sup> See N.D.C.C. § 17-01-01.

<sup>2</sup> North Dakota Department of Commerce. Undated. EmPower North Dakota. Comprehensive State Energy Policy 2010-2025. Accessed online June 17, 2022. Retrieved from <https://www.commerce.nd.gov/sites/www/files/documents/ED%26F/Energy/empower%20state%20energy%20report.pdf>.

<sup>3</sup> U.S. Department of Energy. 2021. Land-Based Wind Market Report. Accessed online June 17, 2022. Retrieved from [https://www.energy.gov/sites/default/files/2021-08/Land-Based%20Wind%20Market%20Report%202021%20Edition\\_Full%20Report\\_FINAL.pdf](https://www.energy.gov/sites/default/files/2021-08/Land-Based%20Wind%20Market%20Report%202021%20Edition_Full%20Report_FINAL.pdf).

<sup>4</sup> Lazard, *Lazard's Levelized Cost of Energy Analysis – Version 15.0* (October 2021), at 2. Accessed online June 17, 2022. Retrieved from <https://www.lazard.com/media/451905/lazards-levelized-cost-of-energy-version-150-vf.pdf>.

<sup>5</sup> National Conference of State Legislatures, State Renewable Portfolio Standards and Goals (Aug. 13, 2021), <https://www.ncsl.org/research/energy/renewable-portfolio-standards.aspx>; MTEP18 MISO Transmission Enhancement Plan, at 182. Accessed online June 17, 2022. Retrieved from <https://cdn.misoenergy.org/MTEP18%20Full%20Report264900.pdf>.

<sup>6</sup> See Lawrence Berkeley National Laboratory, U.S. Renewable Portfolio Standards 2019 Annual Status Report (July 2019), at 24. Retrieved from [https://eta-publications.lbl.gov/sites/default/files/rps\\_annual\\_status\\_update-2019\\_edition.pdf](https://eta-publications.lbl.gov/sites/default/files/rps_annual_status_update-2019_edition.pdf).

630 TWh in 2030.<sup>7</sup> Given existing renewable energy capacity, an additional 250 TWh increase in renewable resources will be required to meet demand through 2030.<sup>8</sup> In addition, the regional transmission grid is being expanded to deliver wind generation in a cost-effective manner; specifically, MISO's Multi-Value Project ("MVP") Portfolio is expected to enable 41 million megawatt hours ("MWh") of wind energy per year to meet renewable energy mandates and goals.<sup>9</sup>

Given the geographic proximity of the proposed Project to the Minnesota market, energy from the proposed Project may be utilized to meet the existing renewable energy needs of one or more utilities in the MISO region, as well as other utilities located in adjacent Regional Transmission Organizations/Independent System Operators, such as the Southwest Power Pool.

In addition to traditional local and regional utility demand for wind energy, a growing number of corporations are turning to renewable energy to save money on energy and meet sustainability goals. Corporate customers either purchase renewable energy directly or obtain renewable benefits and cost savings through financially settled contracts, sometimes called virtual PPAs. In addition, many utilities are creating "green tariffs," which allow customers to purchase up to 100 percent renewable energy from the utility.<sup>10</sup>

Beyond the growing demand from utilities, corporations such as Apple, Google and Facebook, along with many others, have recently set goals to obtain 100 percent of their energy from renewables. These clean energy goals fuel the demand for corporate renewables procurement and subsequent PPAs. According to Wood Mackenzie's report titled an "*Analysis of Commercial and Industrial Wind Energy Demand in the United States*," the United States is "at the beginning stage of a corporate renewables procurement boom," with approximately "85 gigawatts of renewable energy demand" from the "largest U.S. companies" alone through 2030.<sup>11</sup> Another Wood Mackenzie report titled "*US Corporate Procurement of Wind and Solar 2020*" lists 2019 as "the largest year for megawatts of annual wind and solar [commercial and industrial ("C&I")] capacity additions and the largest year on record for new wind and solar C&I PPAs signed." These growth trends are expected to continue, and 2020-2021 saw an immense demand for C&I renewable energy PPAs.<sup>12</sup> Similarly, according to a 2019 research report, corporate contracts

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<sup>7</sup> Lawrence Berkeley National Laboratory, U.S. Renewable Portfolio Standards, 2021 Status Update (February 2021), at 25. Retrieved from [https://eta-publications.lbl.gov/sites/default/files/rps\\_status\\_update-2021\\_early\\_release.pdf](https://eta-publications.lbl.gov/sites/default/files/rps_status_update-2021_early_release.pdf).

<sup>8</sup> Lawrence Berkeley National Laboratory, U.S. Renewable Portfolio Standards, 2021 Status Update (February 2021), at 27.

<sup>9</sup> MTEP 18 MISO Transmission Enhancement Plan, at 42.

<sup>10</sup> U.S. Environmental Protection Agency – Green Power Partnership. Guide to Purchasing Green Power. Chapter 4. Accessed online June 17, 2022. Retrieved from [https://www.epa.gov/sites/default/files/2016-01/documents/purchasing\\_guide\\_for\\_web.pdf](https://www.epa.gov/sites/default/files/2016-01/documents/purchasing_guide_for_web.pdf).

<sup>11</sup> Wood Mackenzie, *Corporates usher in new wave of US wind and solar growth* (Aug. 20, 2019). Accessed online June 17, 2022. Retrieved from <https://www.woodmac.com/our-expertise/focus/Power--Renewables/corporates-usher-in-new-wave-of-u.s.-wind-and-solar-growth/>.

<sup>12</sup> See, e.g., Jared Anderson, *US Corporate Renewable Power Buyers Procure 10.6 GW of Capacity in 2020* (Feb. 10, 2021). Accessed online June 17, 2022. Retrieved from <https://www.spglobal.com/commodityinsights/en/market-insights/latest-news/coal/021021-us-corporate-renewable-power-buyers-procure-106-gw-of-capacity-in-2020>; Michael Copley, *Corporate Renewable Energy Deals Soared in 2021, Smashing Previous Record* (Jan. 31, 2022). Accessed online June 17, 2022.

accounted for 22 percent of 2018 PPAs for renewables in the United States.<sup>13</sup> Further, the buyers are not just large corporations; smaller companies are entering into aggregated purchasing models and further driving additional market expansion.<sup>14</sup>

In summary, the renewable energy produced by Rolette Power's Project will be positioned to help meet local renewable energy initiatives/goals, the regional need for renewable energy, or national C&I customer demand.

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Retrieved from <https://www.spglobal.com/marketintelligence/en/news-insights/latest-news-headlines/corporate-renewable-energy-deals-soared-in-2021-smashing-previous-record-68659987>.

<sup>13</sup> Emma Foehringer Merchant, *Corporate Renewables Procurement Accounted for Nearly a Quarter of All Deals in 2018* (Feb. 5, 2019). Accessed online June 17, 2022. Retrieved from <https://www.greentechmedia.com/articles/read/corporate-renewables-procurements-quarter-ppa-2018>.

<sup>14</sup> See Emma Foehringer Merchant, *2018 Was Record Year for Corporate Clean Energy Contracts* (Jan. 31, 2019). Accessed online June 17, 2022. Retrieved from <https://www.greentechmedia.com/articles/read/reports-confirm-a-record-year-for-corporate-clean-energy-contracts#gs.nxat51>.

**STATE OF NORTH DAKOTA**  
**PUBLIC SERVICE COMMISSION**

**IN THE MATTER OF THE FILING OF A  
TEN YEAR PLAN BY ROLETTE POWER  
DEVELOPMENT, LLC**

Case No. PU-22-\_\_\_\_

**NOTICE OF FILING TEN YEAR PLAN  
2022-2032**

**PLEASE TAKE NOTICE** that Rolette Power Development, LLC, in accordance with N.D.C.C. § 49-22-04 and N.D.A.C. Ch. 69-06-02, filed a Ten Year Plan for the years 2022 through 2032 with the North Dakota Public Service Commission on June 30, 2022, and the Rolette County Auditor on June 30, 2022.

Dated this 30th day of June, 2022.

FREDRIKSON & BYRON, P.A.



By \_\_\_\_\_

MOLLIE M. SMITH, ND Bar #06714  
*Attorney for Rolette Power Development,  
LLC*  
200 South Sixth Street, Suite 4000  
Minneapolis, MN 55402-1425  
(612) 492-7270

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a true and correct copy of the following document:

**NOTICE OF FILING TEN-YEAR PLAN: 2022-2032**

was served on the 30th day of June, 2022 by placing the same in the United States mail, postage prepaid, properly addressed to the following:

North Dakota Aeronautics Commission  
P.O. Box 5020  
Bismarck, ND 58502-5020

North Dakota Office of Attorney General  
600 E. Boulevard Ave.  
Dept. 125  
Bismarck, ND 58505

North Dakota Department of Agriculture  
600 E. Boulevard Ave.  
Dept. 602  
Bismarck, ND 58505-0020

North Dakota Department of Health  
600 E. Boulevard Ave.  
Bismarck, ND 58505-0200

North Dakota Department of Human Services  
600 E. Boulevard Ave.  
Dept. 325  
Bismarck, ND 58505-0250

North Dakota Department of Labor and Human Rights  
600 E. Boulevard Ave.  
Dept. 406  
Bismarck, ND 58505-0340

North Dakota Department of Career and Technical Education  
State Capitol, 15th Floor  
600 E. Boulevard Ave., Dept. 270  
Bismarck, ND 58505-0610

North Dakota Department of Commerce  
1600 E. Century Ave., Suite 2  
P.O. Box 2057  
Bismarck, ND 58503

Energy Infrastructure and Impact Office  
North Dakota Department of Trust Lands  
1707 North 9th Street  
P.O. Box 5523  
Bismarck, ND 58506-5523

North Dakota Game and Fish Department  
100 N. Bismarck Expressway  
Bismarck, ND 58501-5095

North Dakota Industrial Commission  
State Capitol, 14th Floor  
600 East Boulevard Ave., Dept. 405  
Bismarck, ND 58505-0840

Office of Governor Doug Burgum  
State of North Dakota  
600 E. Boulevard Ave.  
Bismarck, ND 58505-0001

North Dakota Department of Transportation  
608 E. Boulevard Ave.  
Bismarck, ND 58505-0700

State Historical Society of North Dakota  
612 E. Boulevard Ave.  
Bismarck, ND 58505-0830

North Dakota Indian Affairs Commission  
State Capitol Building  
600 E. Boulevard Ave.  
1st Floor - Judicial Wing, Rm. #117  
Bismarck, ND 58505-0300

Job Service North Dakota  
P.O. Box 5507  
Bismarck, ND 58506-5507

North Dakota Department of Trust Lands  
1707 North 9th Street  
P.O. Box 5523  
Bismarck, ND 58506-5523

North Dakota Parks and Recreation Department  
Century Center  
1600 E. Century Ave., Suite 3  
PO Box 5594  
Bismarck, ND 58506-5594

Natural Resources Conservation Service  
North Dakota NRCS State Office  
220 East Rosser Avenue  
Federal Building, Room 270  
Bismarck, ND 58501

North Dakota State Water Commission  
900 E. Boulevard Ave., Dept. 770  
Bismarck, ND 58505-0850

United States Department of Defense  
1400 Defense Pentagon  
Washington, DC 20301-1400

United States Fish and Wildlife Service  
North Dakota Field Office  
3425 Miriam Avenue  
Bismarck, ND 58501-7926

United States Army Corps of Engineers  
North Dakota Regulatory Office  
3319 University Drive  
Bismarck, ND 58504

Federal Aviation Administration  
United States Department of Transportation  
800 Independence Ave. SW  
Washington, DC 20591

North Dakota Transmission Authority  
c/o North Dakota Industrial Commission  
State Capitol 14th Floor  
600 E. Boulevard Ave. Dept. 405  
Bismarck, ND 58505-0840

North Dakota Pipeline Authority  
c/o North Dakota Industrial Commission  
State Capitol 14th Floor  
600 E. Boulevard Ave. Dept. 405  
Bismarck, ND 58505-0840

North Dakota Department of Environmental Quality  
4201 Normandy Street  
Bismarck, ND 58503-1324

North Dakota Geological Survey  
600 East Boulevard Avenue,  
Bismarck ND 58505-0840

North Dakota Forest Service  
State Headquarters - Molberg Center  
307 - 1st Street East  
Bottineau ND 58318-1100

Federal Bureau of Land Management  
Montana/Dakotas State Office  
5001 Southgate Drive  
Billings, MT 59101

Military Aviation and Installation Assurance Siting Clearinghouse  
3400 Defense Pentagon, Room 5C646  
Washington, DC 20301 – 3400

20<sup>th</sup> Airforce 91<sup>st</sup> Missile Wing  
c/o Colonel Christopher Menuey  
Minot AFB, ND 58705-5006

Minot Air Force Base  
c/o Laura E. Seabeneck, Community Planner  
445 Peacekeeper Place  
Minot AFB, ND 58705-5006

Grand Forks Air Force Base  
319th Air Base Wing Public Affairs Office  
701 Eielson St, Bldg 607 Rm 211  
GFAFB ND 58204

Rolette County Commission  
102 2nd Street NE  
PO Box 939  
Rolla, ND 58367

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

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MOLLIE M. SMITH