Fredrikson & BYRON, P.A.

July 1, 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: Lincoln Valley Wind, 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. Lincoln Valley Wind, 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

MOLLIE M. SMITH

MMS/bd/76339334
Enclosures

cc: Scott Wentzell (w/ encls. via e-mail)

1 PU-22-299 Filed 07/01/2022 Pages: 14
2022 - 2032 Ten Year Plan
Lincoln Valley Wind, LLC
Mollie Smith, Fredrikson&Byron, P.A.

STATE OF NORTH DAKOTA

PUBLIC SERVICE COMMISSION

IN THE MATTER OF THE FILING OF A TEN YEAR PLAN BY LINCOLN VALLEY WIND, LLC **Case No. PU-22-___**

CERTIFICATE OF SERVICE

Mollie M. Smith, being first duly sworn, does depose and state that on July 1, 2022, she served the following document:

Lincoln Valley Wind, LLC's Ten Year Plan: 2022-2032

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

Shirley Murray
Sheridan County Auditor
PO Box 439
McClusky, North Dakota 58463

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

Mollie M. Smith

TEN YEAR PLAN: 2022-2032
Lincoln Valley Wind, LLC

July 2022

In accordance with N.D.C.C. § 49-22-04 and N.D.A.C. Ch. 69-06-02, Lincoln Valley Wind, LLC ("Lincoln Valley"), 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.

Lincoln Valley is a Delaware limited liability company, authorized to do business in the State of North Dakota. Lincoln Valley is constructing an up to approximately 323 megawatt ("MW") wind energy conversion facility known as the Lincoln Valley Wind Project (the "Wind Project") and an associated 230 kilovolt ("kV") transmission line to connect the Wind Project to the grid (the "Transmission Line") (collectively, the "Project"). The Wind Project will be located in Sheridan County, North Dakota, approximately 10 miles north/northeast of McClusky. The Transmission Line will be located within the proposed Wind Project boundary. The Transmission Line will be approximately 5 miles in length and extend from the Wind Project substation in Sheridan County to a new 230 kV switching station to be constructed along the existing Coal Creek to Harvey 230 kV transmission line owned by Otter Tail Power Company ("OTP") in Sheridan County, North Dakota.

Other than the proposed Wind Project and Transmission Line, Lincoln Valley does not have any transmission or generation facilities located in North Dakota. The Project will have an estimated life of greater than 10 years. As such, Lincoln Valley does not have any plans to decommission any transmission or generation facilities within the timeframe of this plan.

(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.

The proposed Wind Project footprint is located in Sheridan County, North Dakota, approximately 10 miles north/northeast of McClusky. The anticipated route for the Transmission Line will extend from the Wind Project substation to its planned point of interconnection to the grid at a new 230 kV switching station which will be constructed along the existing Coal Creek to Harvey 230 kV transmission line owned by OTP, located in Sheridan County, North Dakota.

Lincoln Valley has retained qualified environmental consulting firms to evaluate the proposed Wind Project site and Transmission Line corridor and route to ensure compliance 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. A map depicting the Wind Project area and Transmission Line corridor and route is attached as **Exhibit A**.

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

Lincoln Valley is in the process of identifying an offtaker for the Wind Project's output. Energy produced by the Wind Project may help local or regional utilities to meet applicable renewable energy needs. Lincoln Valley has submitted an interconnection application for 300 MW to the Midcontinent Independent System Operator, Inc. ("MISO"). MISO has three study stages. For Lincoln Valley, MISO is currently in the third phase of the study process. The expected date for Generator Interconnection Agreement ("GIA") execution with MISO and OTP is first quarter of 2023.

(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.

Lincoln Valley has engaged the services of qualified environmental consulting firms to study and identify avoidance and exclusion areas within the proposed Wind Project site and Transmission Line corridor and route, in accordance with N.D.C.C. Ch. 49-22 and N.D.A.C. Ch. 69-06-08. Additionally, Lincoln Valley has consulted and will continue to consult with applicable state and federal agencies to avoid, minimize, and/or mitigate any impacts to the environment from the construction and operation of the Project. Lincoln Valley has been and will continue to work with Sheridan County and the associated townships to ensure conformance with local land use regulations.

(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.

As discussed above, Lincoln Valley is in the process of identifying an offtaker for the Wind Project's output. Lincoln Valley is actively marketing the Wind Project to a number of potential off-takers and may sell the power in the form of a power purchase agreement ("PPA"), directly on the merchant market, or the Project could be owned directly by a utility. As an independent power producer, Lincoln Valley is able to bid into a variety of markets. Utilities and other customers seeking to diversify and build their energy generation portfolios are attracted to wind energy projects because of long-term, fixed, competitive pricing, environmental benefits and existing and potential renewable energy policies. Thus, the Wind Project could help satisfy local, regional, or even national renewable energy demands.

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."[1] 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.[2] The state had a total of 3,989 MW of installed wind capacity at the end of 2020.[3] 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.[4]

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.[5] Under current state standards, total United States renewable portfolio standard demand will increase from 310 terawatt hours ("TWh") in 2019[6] to 630 TWh in 2030.[7] Given existing renewable energy capacity, an additional 250 TWh increase in renewable resources will be required to meet demand through 2030.[8] 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.[9]

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[1] *See* N.D.C.C. § 17-01-01.

[2] 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.

[3] 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.

[4] 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.

[5] 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.

[6] *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.

[7] 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.

[8] Lawrence Berkeley National Laboratory, U.S. Renewable Portfolio Standards, 2021 Status Update (February 2021), at 27.

[9] MTEP 18 MISO Transmission Enhancement Plan, at 42.

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.[10]

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.[11] 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.[12] Similarly, according to a 2019 research report, corporate contracts accounted for 22 percent of 2018 PPAs for renewables in the United States.[13] Further, the buyers are not just large corporations; smaller companies are entering into aggregated purchasing models and further driving additional market expansion.[14]

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[10] 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.

[11] 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/.

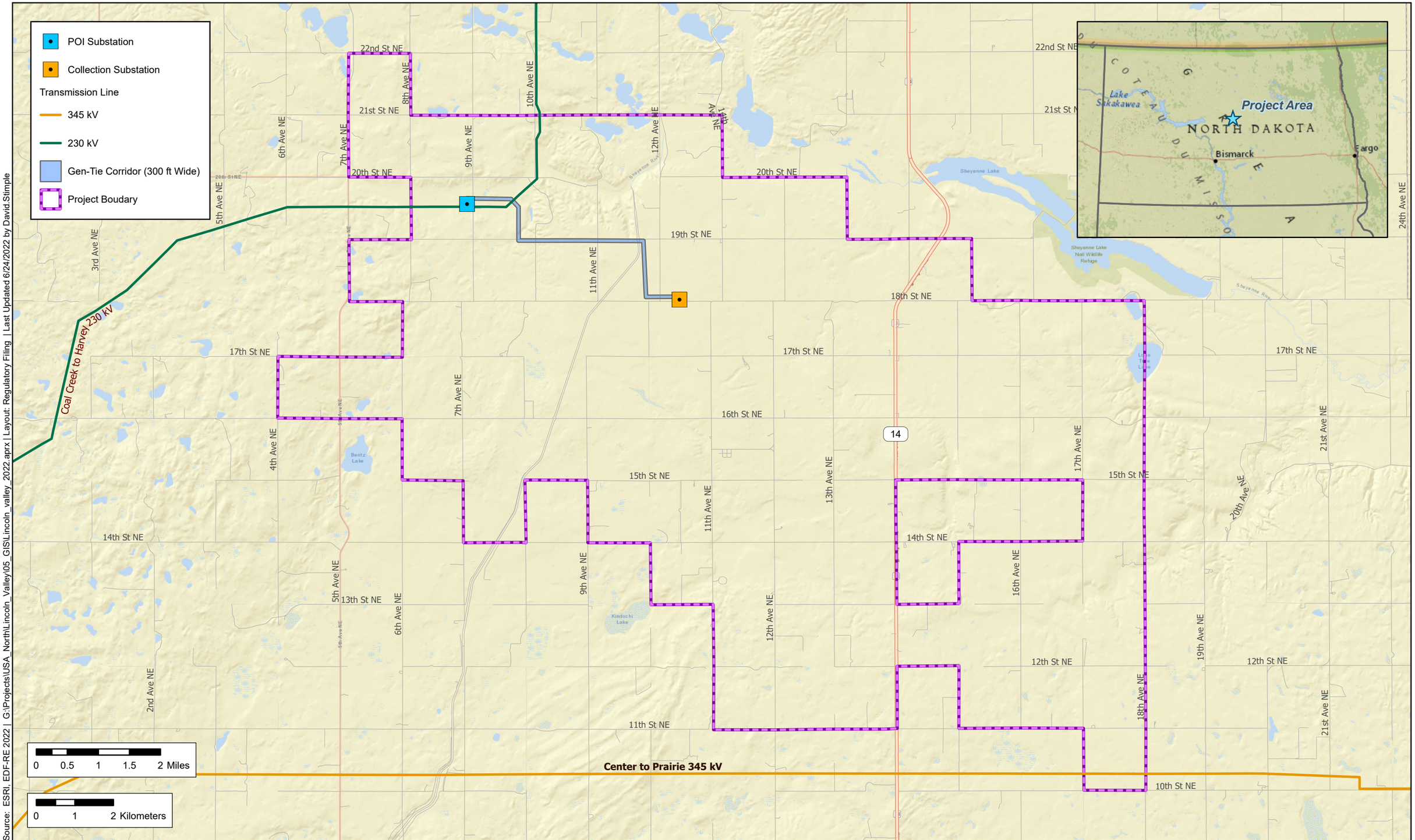
[12] *See, e.g.*, Jared Anderson, *US Corporate Renewable Power Buyers Procure 10.6 GW of Capacity in 2020* (Feb. 10, 2021). Accessed online June 17, 2022. Retrieved from https://www.spglobal.com/commodityinsights/en/market-insights/latest-news/coal/021021-us-corporate-renewable-power-buyers-procure-106-gw-of-capacity-in-2020; Michael Copley, *Corporate Renewable Energy Deals Soared in 2021, Smashing Previous Record* (Jan. 31, 2022). Accessed online June 17, 2022. Retrieved from https://www.spglobal.com/marketintelligence/en/news-insights/latest-news-headlines/corporate-renewable-energy-deals-soared-in-2021-smashing-previous-record-68659987.

[13] 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.

[14] *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.

In summary, the renewable energy produced by Lincoln Valley's proposed Wind Project and transmitted to the grid via Lincoln Valley's proposed Transmission Line will be positioned to help meet local renewable energy initiatives/goals, the regional need for renewable energy, or national C&I customer demand.

Exhibit A



Source: ESRI, EDF-RE 2022 | G:\Projects\USA_NorthLincoln_Valley\05_GIS\Lincoln_valley_2022.aprx | Layout: Regulatory Filing | Last Updated 6/24/2022 by David.Stimple

PROJECT BOUNDARY

Lincoln Valley Wind Project | Sheridan County, North Dakota

A

STATE OF NORTH DAKOTA

PUBLIC SERVICE COMMISSION

IN THE MATTER OF THE FILING OF A TEN YEAR PLAN BY LINCOLN VALLEY WIND, LLC

Case No. PU-22-___

NOTICE OF FILING TEN YEAR PLAN 2022-2032

PLEASE TAKE NOTICE that Lincoln Valley Wind, 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 July 1, 2022, and the Sheridan County Auditor on July 1, 2022.

Dated this 1st day of July, 2022.

FREDRIKSON & BYRON, P.A.

By_____

MOLLIE M. SMITH, ND Bar #06714
Attorney for Lincoln Valley Wind, 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 1st day of July, 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

20th Airforce 91st 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

Sheridan County Board of Commissioners
c/o Shirley Murray, County Auditor
PO Box 439
McClusky, North Dakota 58463

MOLLIE M. SMITH