

July 25, 2023

VIA E-MAIL

Mr. Adam Renfandt
Analyst, Public Utilities Division
North Dakota Public Service Commission
600 E. Boulevard, Dept. 408
Bismarck, ND 58505-0480

**Re: Otter Tail Power Company
Amend – Ashtabula I Wind Energy Facility Upgrade Project
Siting Application – Barnes County
Case No. PU-23-252**

Dear Mr. Renfandt:

Otter Tail Power Company (Otter Tail) received your request for information, dated June 17, 2023, regarding the Ashtabula I Wind Energy Facility Upgrade Project (Upgrade Project). Below are responses to the requests outlined in your letter.

Request 1: *Please provide the following dates:*

- a. *Commencement of the repowering construction*
- b. *Completion of the repowering*
- c. *Testing of its operations*
- d. *Commercial operations date*

Otter Tail's Response: The construction, testing and commissioning schedules are still being developed. The first major component delivery is expected in June 2025. Otter Tail expects the completion of repowering, testing, and commercial operations in the fourth quarter of 2025.

Request 2: *Tables 1 and 2 reference a "Project Area". However, "Figure 1 - Site Overview" has no project area listed on the legend. How many acres does the project area encompass? Include the project area on the map and provide the associated GIS layer. Please also confirm that the "Environmental Study Area" on the same map identifies the circles around each turbine location. Is it the same area referenced as the 300-foot buffer area that was studied and referenced in the Class I Literature Review report? Also, please make the Township and Ranges visible on the map.*

Otter Tail's Response: On Figure 1, the Project Area is the same as the Participating Parcels. The Project Area consists of approximately 3,987 acres, although only approximately 77 acres will be

disturbed by the Upgrade Project. The Environmental Study Area (referred to in the Class I as “Study Area”) comprises approximately 272 acres and consists of a 300-foot buffer around the center point of each existing turbine and a 50-foot buffer (100-foot corridor) off the approximately 8.3 miles of existing access roads. The GIS data for the Environmental Study Area was submitted on a flash drive as part of the Upgrade Project certification filing.

An updated Figure 1 is provided that includes the requested clarifications and information.

Request 3: *Please send agency correspondence to all agencies and officers entitled to receive notice as designated in North Dakota Administrative Code section 69-06-01-05, and file copies of the letters and responses to the Commission.*

Otter Tail’s Response: To ensure compliance with N.D.C.C. § 49-22-03(3)(a)(4)(a), Otter Tail consulted with agencies and entities whose input would assist in confirming the Upgrade Project will not affect known exclusion and avoidance areas. The agencies and entities contacted included: the U.S. Fish and Wildlife Service and North Dakota Game and Fish Department (meeting held March 16, 2023); the State Historical Society of North Dakota (Class I Literature Review submitted on May 26, 2023); the Federal Aviation Administration (FAA), U.S. Department of Defense, and relevant military assets (through the submission of Form 7460-2 to obtain Determinations of No Hazard); agencies/entities consulted as part of the National Telecommunications and Information Administration (NTIA) Coordination conducted by the Interdepartment Radio Advisory Committee (IRAC), including Homeland Security, Broadcasting Board of Governors, Veterans Affairs, U.S. Department of Justice, U.S. Postal Service, North Dakota, U.S. Department of Transportation, National Science Foundation, National Aeronautics and Space Administration, U.S. Department of the Interior, U.S. Department of Commerce, U.S. Department of Treasury, U.S. Department of Energy, U.S. Army, U.S. Department of Agriculture, U.S. Navy, Federal Communications Commission, Health and Human Services, FAA, U.S. Coast Guard, and U.S. Air Force; and Barnes County (meeting with Planning & Zoning Administrator/Emergency Manager on May 18, 2023).

This same approach was taken for each of Otter Tail’s four upgrade projects, including the Langdon Upgrade Project, which was approved by the Commission on June 6, 2023. Additionally, we understand the Commission will send a Notice of Opportunity for Hearing to the agencies and officers identified in NDAC § 69-06-01-05 as part of processing the Upgrade Project certification and amendment request, and interested agencies/officers have provided comments to the Commission following receipt of the notice in prior upgrade project dockets. Given the limited focus of the certification filing, and the fact that the Commission provides notice to the agencies and officers identified in NDAC § 69-06-01-05, Otter Tail believes the necessary consultation has been completed, consistent with the approach taken in the other upgrade project submittals.

Mr. Adam Renfandt
July 25, 2023
Page 3

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An electronic version of this letter was filed with the Commission today via e-mail, and an original and six copies were sent to the Commission via Federal Express. If you have any questions, please let me know.

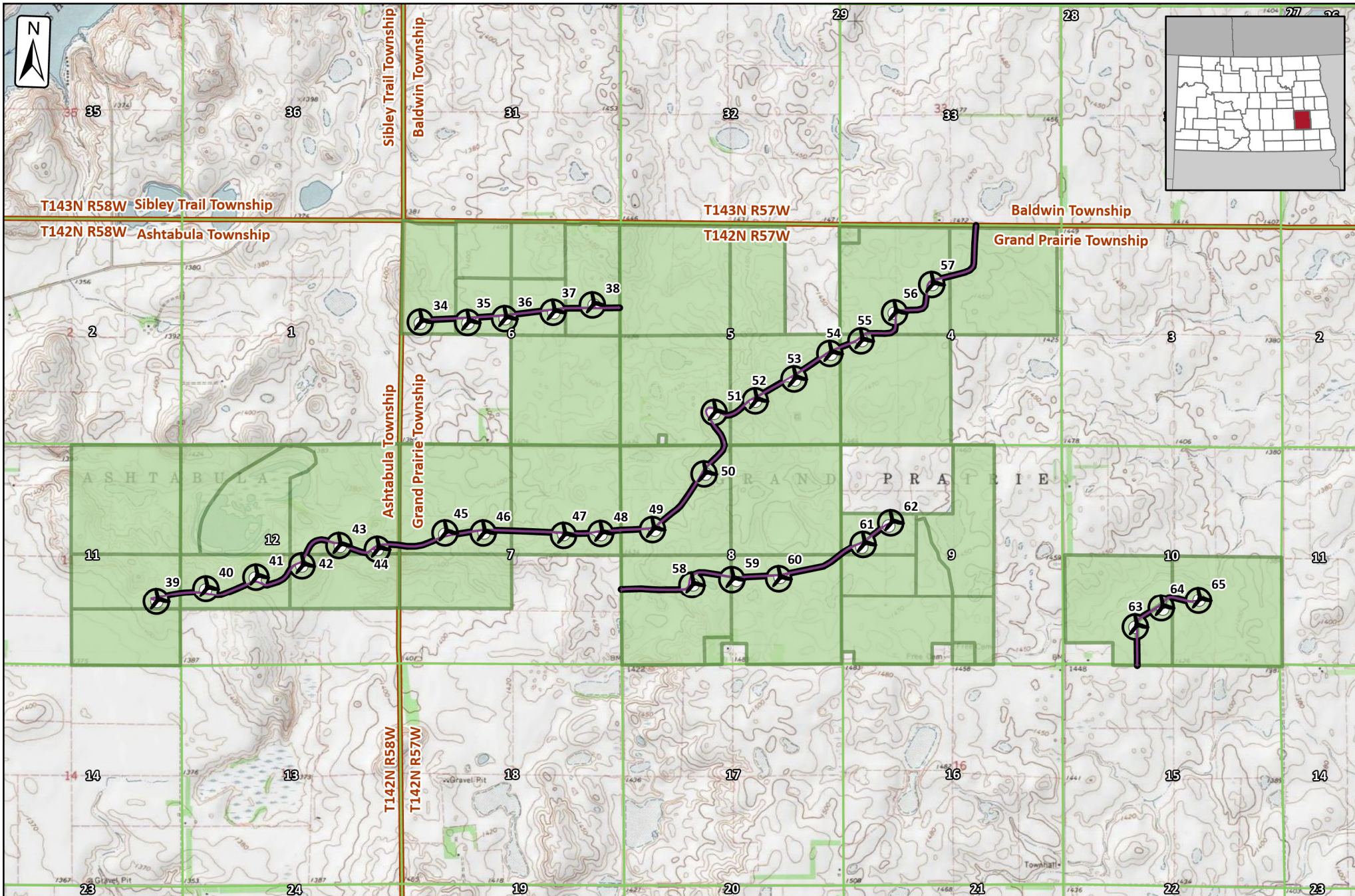
Sincerely,



MOLLIE M. SMITH

MMS/7967024
Enclosures

cc: Steven Kahl, North Dakota Public Service Commission (w/ enclosures, via e-mail and
Federal Express)
Lisa McFarland (w/ enclosures, via e-mail)
Bryce Haugen (w/ enclosures, via e-mail)



Ashtabula I Wind Upgrade Project

Figure 1- Site Overview

Barnes County, North Dakota

Issue Date: 7/21/2023

-  Existing Turbine Locations
-  Existing Access Roads
-  Disturbance Area (~77 acres)
-  Environmental Study Area
-  Project Area (~3,987 acres)
-  Township
-  Section Boundary



SOURCE: USGS Topo Maps