

June 21, 2024

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 2024-2034
Case No. PU-24-___**

Dear Mr. Kahl:

Enclosed for filing are two copies of the following documents:

1. Rolette Power Development, LLC's Ten Year Plan: 2024-2034;
2. Notice of Filing Ten Year Plan: 2024-2034; 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/82724951
Enclosures

cc: Lyle Best (w/ encls. via e-mail)

TEN YEAR PLAN: 2024-2034
Rolette Power Development, LLC

June 2024

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 2024 through 2034.

- (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.”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.

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/MWh, and in general, alternative energy sources provide lower costs per MW-hour than conventional sources.² Wind and solar costs have fallen 41 and 57 percent, respectively, over the last decade, making them the most affordable new electricity sources in most of the U.S.³ By the end of 2022, 27 states were generating at least 10 percent of electricity from wind, utility-scale solar, and small-scale solar.⁴

A need also exists for renewable energy produced in North Dakota to meet state renewable portfolio standards. Ten of the MISO states currently have either mandated or voluntary renewable portfolio standards or policies.⁵ Under current state standards, aggregate United States renewable portfolio standard demand more than doubles from 400 terawatt hours (“TWh”) in 2023 to 900 TWh in 2050.⁶ Given existing renewable energy capacity, roughly 300 TWh of additional clean electricity supply will be required by 2030 and 800 TWh by 2050.⁷ In addition, the regional transmission grid is being expanded to deliver wind generation in a cost-effective manner;

¹ See N.D.C.C. § 17-01-01.

² Lazard, *Lazard’s Levelized Cost of Energy Analysis – Version 16.0* (April 2023), at 2.

³ American Clean Power, 2022 American Clean Power Annual Market Report (2022). Accessed online June 4, 2024. Retrieved from https://cleanpower.org/wp-content/uploads/2023/05/2022-ACP-Annual-Report_Public.pdf (“2022 ACP Market Report”).

⁴ 2022 ACP Market Report.

⁵ U.S. Energy and Information Administration, Renewable energy explained, Portfolio standards (last updated November 30, 2022). Accessed online June 4, 2024. Retrieved from <https://www.eia.gov/energyexplained/renewable-sources/portfolio-standards.php>.

⁶ See Lawrence Berkeley National Laboratory, U.S. State Renewables Portfolio & Clean Energy Standards, 2023 Status Update (June 2023), at 23. Accessed online June 4, 2024. Retrieved from https://eta-publications.lbl.gov/sites/default/files/lbnl_rps_ces_status_report_2023_edition.pdf.

⁷ See Lawrence Berkeley National Laboratory, U.S. State Renewables Portfolio & Clean Energy Standards, 2023 Status Update (June 2023), at 23.

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.⁸

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 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.⁹

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 2030.¹⁰

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.

⁸ MTEP18, MISO Transmission Enhancement Plan, at 42. Accessed online June 4, 2024. Retrieved from <https://cdn.misoenergy.org/MTEP18%20Full%20Report264900.pdf>.

⁹ U.S. Environmental Protection Agency – Green Power Partnership. Guide to Purchasing Green Power. Chapter 4. Accessed online June 4, 2024. Retrieved from https://www.epa.gov/sites/default/files/2016-01/documents/purchasing_guide_for_web.pdf.

¹⁰ Michelle Froese, *Corporates usher in new wave of US wind and solar growth* (Aug. 27, 2019). Accessed online June 4, 2024. Retrieved from <https://www.windpowerengineering.com/corporations-usher-in-new-wave-of-u-s-wind-and-solar-growth/>.

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-24-___

**NOTICE OF FILING TEN YEAR PLAN
2024-2034**

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 2024 through 2034 with the North Dakota Public Service Commission on June 21, 2024, and the Rolette County Auditor on June 21, 2024.

Dated this 21st day of June, 2024.

FREDRIKSON & BYRON, P.A.



By _____

MOLLIE M. SMITH, ND Bar #06714
Attorney for Sunflower Wind Project, LLC
60 South Sixth Street, Suite 1500
Minneapolis, MN 55402-4400
(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: 2024-2034

was served on the 21st day of June, 2024 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 58505-0040

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 58505-0250

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 6
P.O. Box 2057
Bismarck, ND 58502-2057

Energy Infrastructure and Impact Office
North Dakota Department of Trust Lands
1707 North 9th Street
Bismarck, ND 58501

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
Bismarck, ND 58501

North Dakota Parks and Recreation Department
Liberty Memorial Building
604 E Boulevard Ave, Dept. 750
Bismarck, ND 58505

Natural Resources Conservation Service
North Dakota NRCS State Office
220 East Rosser Avenue
Federal Building
Bismarck, ND 58502-1458

North Dakota Department of Water Resources
1200 Memorial Highway, Dept. 770
Bismarck, ND 58504

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

United States Fish and Wildlife Service
North Dakota Ecological Services 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
196 Missile Ave.
Minot AFB, ND 58705-5006

Minot Air Force Base
196 Missile Ave.
Minot AFB, ND 58705-5006

Grand Forks Air Force Base
757 Tuskegee Amn. Blvd.
Grand Forks Air Force Base, ND, 58205
Building 418, East Entrance

Rolette County Board of Commissioners
c/o Kimberly Wuori, County Auditor
102 2nd Street NE
PO Box 939
Rolla, ND 58367



MOLLIE M. SMITH

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-24-_____

CERTIFICATE OF SERVICE

Mollie M. Smith, being first duly sworn, does depose and state that on June 21, 2024, she served the following document:

Ten Year Plan: 2024-2034

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

Kimberly Wuori
Rolette County Auditor
102 2nd Street NE
PO Box 939
Rolla, ND 58367

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



Mollie M. Smith