

June 28, 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: Flickertail Solar Project, 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. Flickertail Solar Project, 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/82718423
Enclosures

cc: Christina Martens (w/ encls. via e-mail)
Nick Schuler (w/ encls. via e-mail)

TEN YEAR PLAN: 2024-2034
Flickertail Solar Project, LLC

June 2024

In accordance with N.D.C.C. § 49-22-04 and N.D.A.C. Ch. 69-06-02, Flickertail Solar Project, LLC (“Flickertail”), 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.*

Flickertail is proposing to develop and construct an up to 300 megawatt (“MW”) alternating current solar energy generating system and associated facilities in Abercrombie Township in Richland County, North Dakota (“Project”). The Project will include solar arrays, inverters, transformers, access roads, an electrical collection system, an operations and maintenance facility, a substation, security fencing, meteorological towers, and other associated facilities.

On November 20, 2023, Abercrombie Township issued a conditional use permit to Flickertail for the Project. Furthermore, on March 19, 2024, Abercrombie Township issued a Building Permit to Flickertail for the Project. Flickertail plans to submit an application for a Certificate of Site Compatibility with the North Dakota Public Service Commission (“Commission”) in 2024.

The Project will interconnect to the grid via an approximately 530-foot long 230 kilovolt (“kV”) gen-tie line extending from the Project’s substation to the point of interconnection, a new switching station at Minnkota Power Cooperative’s (“Minnkota”) existing Frontier-Wahpeton 230 kV transmission line. The gen-tie line will be less than one mile long and, therefore, is not subject to the jurisdiction of the Commission as a “transmission facility.”

Other than the proposed Project, Flickertail 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, Flickertail 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 electric energy conversion facilities and the tentative location of all electric 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 Project will be located in Abercrombie Township in Richland County, North Dakota. The Project will interconnect to Minnkota’s Frontier-Wahpeton 230 kV transmission line. A map of the proposed site for the Project is provided in **Exhibit A**, attached hereto. Flickertail anticipates the Project will be in-service by the end of 2028.

The Project will be designed so as to comply with the exclusion and avoidance areas referenced in N.D.C.C. § 49-22-05.1 and identified in N.D.A.C. Ch. 69-06-08.

- (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.*

Flickertail has identified potential offtakes and is currently negotiating to sell the Project or the Project's power to commercial and industrial customers, utilities, and/or municipalities. Energy produced by the Project may help local or regional utilities to meet applicable renewable energy needs. On August 29, 2023, Flickertail executed a large generator interconnection agreement and Flickertail has negotiated and plans to execute the facility construction agreement no later than July 31, 2024.

- (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.*

Flickertail engaged the services of qualified environmental consulting firms 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. Section 69-06-08-01. As noted above, Abercrombie Township issued a conditional use permit on November 20, 2023, and a building permit on March 19, 2024 for the Project. Additionally, Flickertail has consulted with applicable local, state, and federal agencies and entities in connection with siting and development of the Project. Flickertail will continue to work with agencies and entities, as appropriate, throughout the development, construction, and operation of the Project.

- (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, Flickertail is in the process of identifying an offtaker for the Project's output. Flickertail is actively marketing the project to a number of potential off-takers and may sell the power in the form of a power purchase agreement ("PPA"), or the Project could be owned directly by a utility. As an independent power producer, Flickertail 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 solar energy projects because of their ability to offer high-capacity value and long-term contracts at a fixed and competitive price while simultaneously providing the associated environmental benefits to meet existing and future renewable energy procurement and sustainability goals and mandates. In general, renewable energy sources provide lower costs per megawatt hour than conventional sources.¹ Thus, the Project could help satisfy local, regional, or even national renewable energy demands.

¹ Lazard, *Lazard's Levelized Cost of Energy Analysis – Version 16.0* (April 2023), at 2. Accessed online May 28, 2024. Retrieved from <https://www.lazard.com/media/typdggmm/lazards-lcoeplus-april-2023.pdf>.

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.”² As used in this initiative, low-emission technology includes, among others, solar. Additional renewable resources will be needed to meet the low-emission technology initiative.

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.³ 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 2050.⁴ Given existing renewable energy capacity, roughly 300 TWh of additional clean electricity supply will be required by 2030 and 800 TWh by 2050.⁵ In addition, the regional transmission grid is being expanded to deliver renewable energy generation in a cost-effective manner.⁶ North Dakota’s available land and good insolation, along with newly constructed transmission lines, create an ideal environment for solar energy projects to meet regional renewable and solar standards or policies.

With improving technology and falling costs, utilities are beginning to include solar projects in their resource plans as long-term economic energy and capacity resources. In North Dakota, peak solar generation has a high correlation with the MISO’s coincident peak, which determines the reserve margins MISO utilities must maintain for reliability and reserve sharing purposes. Recent solar pricing has shown that utility scale solar provides electricity during daylight hours at a cost per MW-hour on par, or less than, many gas-fired electric generators. New solar energy facilities are less expensive to construct than new conventional energy sources, even without government subsidies.⁷ In general, renewable energy sources provide lower costs per megawatt hour than conventional sources.⁸

In addition to traditional local and regional utility demand for solar energy, a growing number of corporations are turning to renewable energy to save money on energy and meet

² See N.D.C.C. § 17-01-01.

³ U.S. Energy and Information Administration, *Renewable energy explained, Portfolio standards* (last updated November 30, 2022). Accessed online May 24, 2024. Retrieved from <https://www.eia.gov/energyexplained/renewable-sources/portfolio-standards.php>.

⁴ See Lawrence Berkeley National Laboratory, U.S. Renewable Portfolio Standards, *2023 Annual Status Report* (June 2023), at 23. Accessed online May 24, 2024. Retrieved from https://eta-publications.lbl.gov/sites/default/files/lbnl_rps_ces_status_report_2023_edition.pdf.

⁵ See Lawrence Berkeley National Laboratory, U.S. Renewable Portfolio Standards, *2023 Annual Status Report* (June 2023), at 23.

⁶ MTEP 18 MISO Transmission Enhancement Plan, at 42. Accessed online May 24, 2024. Retrieved from <https://cdn.misoenergy.org/MTEP18%20Full%20Report264900.pdf>.

⁷ Lazard, *Lazard’s Levelized Cost of Energy Analysis – Version 16.0* (April 2023), at 6. Accessed online May 24, 2024. Retrieved from <https://www.lazard.com/media/typdgxmm/lazards-lcoeplus-april-2023.pdf>.

⁸ Lazard, *Lazard’s Levelized Cost of Energy Analysis – Version 16.0* (April 2023), at 2. Accessed online May 24, 2024. Retrieved from <https://www.lazard.com/media/typdgxmm/lazards-lcoeplus-april-2023.pdf>.

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 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

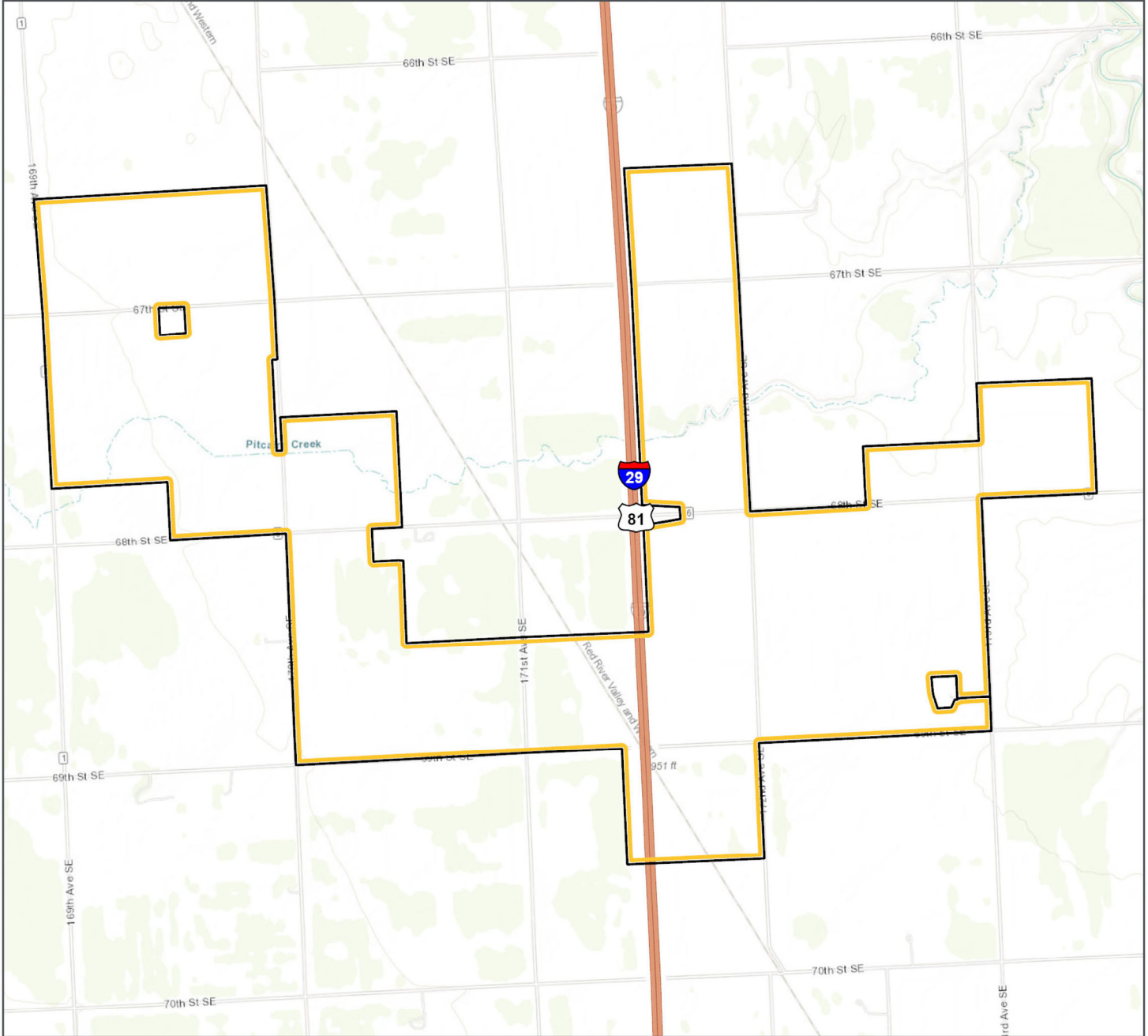
In summary, the renewable energy produced by Flickertail’s proposed Project will be positioned to help meet local renewable energy initiatives/goals, the regional need for renewable energy, or national commercial and industrial customer demand.

⁹ U.S. Environmental Protection Agency – Green Power Partnership. *Guide to Purchasing Green Power*. Chapter 4 at 4-5. Accessed online May 24, 2024. Retrieved from https://www.epa.gov/sites/default/files/2016-01/documents/purchasing_guide_for_web.pdf.

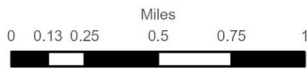
¹⁰ Michelle Froese, *Corporates usher in new wave of US wind and solar growth* (Aug. 27, 2019). Accessed online May 24, 2024. Retrieved from <https://www.windpowerengineering.com/corporations-usher-in-new-wave-of-u-s-wind-and-solar-growth/>.

EXHIBIT A

FLICKERTAIL SOLAR PROJECT, LLC



Project Boundary

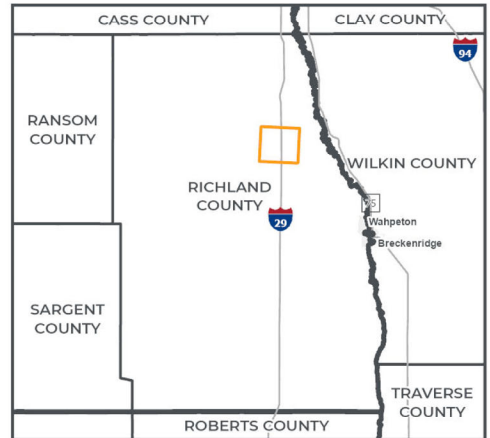


Scale 1:39,000

Coordinate System:
NAD 1983 StatePlane North Dakota South FIPS 3302 Feet

The following companies and organizations provided data that contributed to the production of this map.

- CoreLogic, Inc.
- Environmental Systems Research Institute (ESRI)
- ReGrid, Loveland Technologies
- U.S. Department of Agriculture (USDA)
- U.S. Federal Aviation Administration (FAA)
- U.S. Geological Survey (USGS)
- WhiteStar Corporation
- Ventix, Inc., An ABB Company
- Imagery © 2024 Hexagon and data partners.



Site Location

STATE OF NORTH DAKOTA
PUBLIC SERVICE COMMISSION

**IN THE MATTER OF THE FILING OF A
TEN YEAR PLAN BY FLICKERTAIL
SOLAR PROJECT, LLC**

Case No. PU-24-____

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

PLEASE TAKE NOTICE that Flickertail Solar Project, 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 28, 2024, and the Richland County Auditor on June 28, 2024.

Dated this 28th day of June, 2024.

FREDRIKSON & BYRON, P.A.



By _____

MOLLIE M. SMITH, ND Bar #06714
Attorney for Flickertail Solar 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 28th 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

Richland County Board of Commissioners
c/o Sandy Fossum, County Auditor
418 2nd Ave N
Wahpeton, ND 58075



MOLLIE M. SMITH

STATE OF NORTH DAKOTA
PUBLIC SERVICE COMMISSION

**IN THE MATTER OF THE FILING OF A
TEN YEAR PLAN BY FLICKERTAIL
SOLAR PROJECT, LLC**

Case No. PU-24-_____

CERTIFICATE OF SERVICE

Mollie M. Smith, being first duly sworn, does depose and state that on June 28, 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:

Sandy Fossum
Richland County Auditor
418 2nd Ave N
Wahpeton, ND 58075

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



Mollie M. Smith