



May 18, 2011

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Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East
Suite 350
St. Paul, MN 55101

VIA E-FILING AND U.S. MAIL

RE: In the Matter of the Lakeswind Power Partners, LLC Application for a Large Wind
Energy Conversion System Site Permit
MPUC Docket No. IP-6603/WS-08-1449

Dear Dr. Haar:

Enclosed please find Lakeswind Power Partners, LLC Petition for Second Amendment to Site Permit in the above-referenced docket. The document has been filed with the E-Docket system and served on the attached service list. Also enclosed is our Affidavit of Service.

Sincerely,

WINTHROP & WEINSTINE, P.A.

/s/ Eric F. Swanson

Eric F. Swanson

Enclosures

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Julia	Anderson	Julia.Anderson@state.mn.us	Office of the Attorney General-DOC	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	No	OFF_SL_8-1449_1
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_8-1449_1
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Matthias	Weigel	matthias.weigel@prwind.com	Project Resources Corporation	618 Second Ave SE Minneapolis, MN 55414	Paper Service	No	OFF_SL_8-1449_1

STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION
121 Seventh Place East, Suite 350
St. Paul, Minnesota 55101-2147

Ellen Anderson	Chair
David Boyd	Commissioner
J. Dennis O'Brien	Commissioner
Phyllis Reha	Commissioner
Betsy Wergin	Commissioner

In the Matter of the Lakeswind Power Partners, MPUC Docket No. IP-6603/WS-08-1449
LLC Application For a Large Wind Energy
Conversion System Site Permit

**PETITION FOR SECOND
AMENDMENT TO SITE PERMIT**

Pursuant to Minnesota Rules 7854.1300, Lakeswind Power Partners, LLC (“Lakeswind”) respectfully files this Petition to amend the September 18, 2009 Site Permit (“Permit”) issued by the Minnesota Public Utilities Commission (“Commission” or “PUC”) in the above-captioned docket.

In a previous filing, Lakeswind petitioned to amend Section III.J.4 of the Permit to reflect the language of Minnesota Rules 7854.1100, subp. 3, to provide Lakeswind additional flexibility in meeting the condition for a commitment of the purchase of power from this project.

The Commission has yet to rule on that Petition.

An additional issue has now arisen, which this filing seeks to address. Due to issues beyond the control of Lakeswind, MISO is currently re-studying the Lakeswind Project and all “group-5” generation interconnections to establish a new regime of interconnect costs for the proposed generators, and possible changes to the schedule regarding when interconnection service will be available. Lakeswind anticipates that the restudy and associated cost allocation/cost recovery procedures will require up to approximately one year to complete. This delay at MISO impacts the project timeline, particularly the timeline for financing Lakeswind.

We anticipate that if the MISO group-5 restudy process and associated cost allocation procedures are concluded as now planned, the project will be in a position to close financing in 2012 to enable construction in late 2012 or early 2013.

Therefore, Lakeswind respectfully requests that the Permit be further amended to allow for a two year extension to the current two year period to commence construction, which is set to expire on September 18, 2011. Lakeswind seeks no other change to the Permit or Permit Conditions approved by the Commission in its September 18, 2009 Findings of Fact, Conclusions of Law and Order (“Order”) in this matter.

As further amended, the Site Permit would read, at Section III.K.2:

If the Permittee has not completed the pre-construction surveys required in paragraph III.D and commenced construction of the LWECs within ~~two~~ four years of the issuance of this Permit, the Permittee must advise the PUC of the reason construction has not commenced. In such event, the PUC may determine whether this Permit should be amended or revoked. No revocation of this Permit may be undertaken except in accordance with applicable statutes and rules, including Minnesota Statute 216F.05 and Minnesota Rule 7836.1300.

An amended Permit as requested herein would allow Lakeswind additional time to bring this project to fruition. See Order, page 12. Lakeswind and its prospective financing source(s) require this additional time to allow MISO to complete its restudy and associated work to finalize interconnect costs and schedule for this project. As the Commission previously found, the project brings substantial benefits, in a manner consistent with environmental preservation, sustainable development and the efficient use of resources. See Order, page 18. Therefore, this additional amendment to the Permit will be fully consistent with the public interest. Moreover, this Commission has recognized the need for additional time for other wind developments due to the delays in the MISO “group-5” process. See, *In the Matter of the Site Permit issued to Comfrey Wind Energy, LLC for a Large Wind Energy Conversion System in Brown and*

Cottonwood Counties, MPUC Docket No. IP-6630/WS-07-31, March 11, 2011 Order (approving two year extension of time to commence construction due to MISO study process delays).

Respectfully submitted this 18th day of May, 2011.

/s/ Eric F. Swanson

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