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September 1, 2016

Via Electronic Filing

Hon. Kathleen H. Burgess, Secretary
New York State Public Service Commission
Empire State Plaza, Agency Building 3
Albany, NY 12223-1350

RE: Case 16-F-0267, Deer River Wind Farm Project, Lewis and Jefferson Counties, NY

Dear Secretary Burgess:

Atlantic Wind LLC ("the Applicant"), a wholly-owned subsidiary of Avangrid Renewables LLC ("AR"), is seeking a Certificate of Environmental Compatibility and Public Need ("Certificate"), under Article 10 of the Public Service Law, to construct the Deer River Wind Farm Project ("DRWFP" or "the Project"), to be located in the Towns of Pinckney, Harrisburg and Montague in Lewis County, and the Town of Rodman in Jefferson County.

On May 9, 2016, Atlantic Wind filed its Public Involvement Program Plan ("PIP") for the DRWFP, in response to which the Department of Public Service Staff ("DPS" or "DPS Staff") filed comments, dated June 8, 2016, and Atlantic Wind filed responses to those comments dated July 8, 2016 ("Revised PIP"). In the Revised PIP, Atlantic Wind provided an update on the proposed Project Area, which was revised slightly after the filing of the original PIP. In an undated letter filed August 4, 2016, DPS Staff submitted additional comments on the revised PIP. Initially, to avoid confusion, we note there is no provision for additional comments on a Revised PIP filing in 16 NYCRR 1000.4(e). Moreover, as the Department is aware, the Project is in the early stages of development and landowner discussions for participation in the Project are ongoing. To the extent that the Project Area is further refined through the Article 10 pre-application process, we will provide information to stakeholders regarding such changes through the process identified in the PIP and may update the Plan as necessary, but do not anticipate restarting the process set forth in 1000.4(e) each time.

This letter serves to respond to those additional comments, where needed, and to file a revised version of the PIP which makes changes based on some of DPS Staff's

recommendations. In some cases, DPS comments request information or additions which were already included in the first PIP draft and/or Revised PIP; for those comments, no additional changes are made here.

Responses to DPS Comments

Section 2.0 – Project Description

2.2 Project Summary

1. The revised Deer River Wind project area directly involves designated resources and public lands that were not included in the original PIP Plan. DPS staff recommends additional consultations and outreach efforts to engage stakeholders not identified in the original PIP Plan.

Response: Comment noted.

2.3 Study Area

1. The revised project area includes areas of Lewis County Forest Lands, including the Pinckney Cronk Road Forest. DPS staff recommends that the Lewis County Recreation, Forestry and Parks Department be added to the Stakeholders List. The County has designated many local roads as ATV trails, also. The County Trials coordinator should be consulted for interest in project planning.

Response: Comment noted. This department has been added to the PIP. Atlantic Wind notes that wherever municipal governments, such as counties or towns, are considered stakeholders for a Project, the inclusion of that municipality on the stakeholder list is intended to be inclusive of all relevant departments and agencies under the auspices of that municipality. For example, Lewis and Jefferson Counties are listed as stakeholders for this Project, and Atlantic Wind intends to consult with County officials to determine which County departments and entities have an interest in the Project, are responsible for resources which might be impacted by the Project, and/or could potentially provide additional information on resources or impacted groups which should be incorporated into the overarching public outreach strategy. In several instances, specific County or municipal departments have been added as separate “stakeholders” at the request of DPS Staff. However, the inclusion of those departments on an individual basis was not intended to suggest that outreach would be in any way limited to *only* those departments specifically listed. A robust public outreach strategy will necessarily require broad inclusion of municipal offices and agencies, to ensure the municipality’s interests are fully represented in the proceeding and understood by the Applicant. To clarify this point, the PIP has been revised to group individual departments under the broader municipal umbrella, to emphasize that outreach to a County or Town will necessarily entail outreach to its potentially impacted departments.

2. The revised project area also includes several tributaries of Sandy Creek, a designated National Rivers Inventory (NRI) waterway with potential for listing as a National Wild and Scenic River. The NRI program is administered by the National Park Service Rivers, Trails and Conservations Assistance bureau, and should be added to the Potential Stakeholders list.

Response: This stakeholder has been added to the PIP.

3. *The revised project area now includes areas abutting and including highways under the jurisdiction of the Jefferson County Highway Department. DPS Staff recommends the Jefferson County Highway Department be added as a stakeholder.*

Response: The Jefferson County Highway Department was listed as a stakeholder in both the original PIP filing (page 9, Section 3.2: Local Agencies, 9th entry on the list) and the July Revised PIP filing (page 10, Section 3.2: Local Agencies, 13th entry on the list).

Section 5.0 – Proposed Public Involvement

DPS Staff recommends a local repository within the Town of Pinckney be established. It should also be included in the Stakeholder list because it is a project related document repository.

Response: The Pinckney Town Hall was added as a local document repository in the July Revised PIP (page 14, first repository listed), and was listed among the local document repositories in the Master Stakeholder List (Appendix A, page 10, first repository listed).

Section 5.3.1—Public Meetings

DPS staff recommends the PIP Plan be updated with the date, time and location of the September open house.

Response: The arrangements for the September Open House, which were not final at the time of the July Revised PIP was filed, have now been added to the PIP and the Project Website. The sessions will be held Tuesday, September 20, 2016 at the Pinckney Town Hall, 307 State Route 177, Barnes Corners, NY 13626. Two time periods will be offered, to accommodate the schedules of working people—one session from 2 p.m. to 4 p.m. and one from 6 p.m. to 8 p.m.

To provide the public with notice of these events, advertisements have been purchased for publication in the PIP's identified newspapers several times throughout the month of September, including at least two weeks before the event, a second time approximately one week before the event, and on the day of the event, where possible, based on available publication dates. Flyers will be posted in the towns of Harrisburg, Pinckney, Montague and Rodman, and the event has been submitted to local online event calendars, such as northcountrynow.com.

Section 5.4—Website

DPS staff recommends adding a link to the website indicating the process to for being added to the Service/Party list.

Response: The requested link has been added to the Project Website.

Exhibit A: Master List of Stakeholders and Notification List

DPS Staff recommends that the contact person for the NYS Department of Public Service be changed to Kathleen H. Burgess, Secretary to the Commission.

Response: This change has been made.

DPS Staff recommends that contact persons be established for the following Local Agencies: Jefferson County Soil and Water Conservation District, Lewis County Chamber of Commerce, and the Southern Jefferson Chamber of Commerce.

Response: To the extent this information is available at this time, it has been added.

We look forward to working with the New York State Board on Electric Generation Siting and the Environment, the DPS, and Project stakeholders in review of this project. If you have any questions, please feel free to contact me at (518)438-9907.

Respectfully,

/s/ Laura K. Bomyea

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