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Via Electronic Filing

Michelle L. Phillips, Secretary to the Commission
New York State Public Service Commission
Empire State Plaza, Agency Building 3
Albany, NY 12223-1350

Zeryai Hagos, Executive Director
New York State Office of Renewable Energy Siting and Electric Transmission
Three Empire State Plaza
Albany, NY 12223-1350

Re: Matter No. 23-02976: Application of Hoffman Falls Wind LLC - Response to Request Regarding Turbine 6

Dear Secretary Phillips and Executive Director Hagos:

Hoffman Falls Wind LLC (the “Permittee”) respectfully submits this response to the Office’s March 20, 2026, correspondence regarding the Permittee’s January 30, 2026, minor modification request and, in particular, the Office’s request that the Permittee consider the elimination of Turbine 6 or provide an explanation as to why such removal was not proposed.

At the outset, the Permittee emphasizes that the removal of six turbines (T-1, T-2, T-11, T-15, T-17, and T-24) was the result of a careful evaluation undertaken to reduce environmental impacts, address land control constraints, and reflect evolving project conditions.

Certain turbine locations were proximate to wetlands, and their removal eliminates any potential impact to such resources. In addition, several turbines were located on parcels where adjacent landowner agreements could not be secured on acceptable terms. Their removal was therefore necessary to maintain compliance with Permit conditions.

Importantly, these turbines, including Turbine 6, could not easily be relocated within the Facility. Any relocation of turbine locations could necessitate re-initiation of review by the Federal Aviation Administration (FAA) and United States Department of Defense (DoD).

Turbine 6 does not present the constraints that necessitated removal of the other turbines and, therefore, was not included in the modification request. Turbine 6 is not located in proximity to wetlands, nor is it affected by unresolved landowner agreement issues. Accordingly, the principal drivers necessitating the removal of the other turbines are not applicable to Turbine 6. Moreover, Turbine 6 was carefully sited to minimize waking effects and maintain separation from other turbines. Proper distancing is required by the turbine manufacturers to minimize wake-induced energy losses, curtailment, and supports long term efficiency and durability of the project. (See Rebuttal Testimony Liberty Panel, DMM Item No. 166).

In addition, Turbine 6 is among the most productive turbines remaining within the Facility layout based on wind resource modeling and site-specific conditions. Its removal would result in a material reduction in overall Facility output, estimated at up to approximately seven percent (7%) of total generation. In light of the reduction in the Facility through the removal of six turbines, any further reduction would disproportionately impact overall project performance and would significantly impair the Facility's ability to meet its design expectations, contractual obligations, and contribute to New York State's renewable energy objectives.

The Permittee also notes that the Office has already determined that the removal of the six identified turbines constitutes a minor modification pursuant to 16 NYCRR § 1100-1.2(ai). Retention of Turbine 6 is consistent with maintaining the approved design envelope and does not introduce any new or increased environmental impacts relative to the permitted configuration. Furthermore, as demonstrated, Turbine 6 will not interfere with the County's microwave link. (See Decision of the Executive Director, DMM Item No. 192 at 8)

For all of the foregoing reasons, the Permittee respectfully submits that the removal of Turbine 6 is neither warranted nor practicable. The turbines eliminated through the January 30, 2026, modification request were carefully selected to address specific environmental and land control constraints, whereas Turbine 6 remains a critical, compliant, and fully reviewed component of the Facility.

Should you have any questions or require anything further in this regard, please feel free to contact us. Thank you.

Respectfully,



Jessica Ansert Klami

James A. Muscato II

Young/Sommer LLC

Attorneys for Hoffman Falls Wind LLC

Cc: Party List for the Proceeding (*via electronic filing and email*)