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SD Public Utilities Commission
Attn: Patricia Van Gerpen, Executive Director
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RE: In the Matter of the Application by Buffalo Ridge II LLC a subsidiary of Iberdrola Renewables, Inc., for an Energy Conversion Facility Permit for the Construction of the Buffalo Ridge II Wind Farm and Associated Collection Substation and Electric Interconnection System

PUC Docket: EL08-031

MAGT File: 5577

Dear Commissioners:

As you inquired about end of service life matters surrounding turbine blades, I write to offer the following information.

There is a market for recycling blades, but it is very young and just has not been around for long. Turbine blade recyclers are not abundant throughout the US, and therefore, pricing seems to fluctuate quite a bit. The closest known recycler that we are aware of, Global Fiberglass, Inc., has a plant located in Newton, Iowa. The blades are recycled into plastic products of different sorts.

Whether this would be a viable future option for Buffalo Ridge II, we cannot yet say. Past estimates have stated recycling costs could be 2-3x that of landfilling, but this cost estimate is also reliant upon local landfills' capacity and willingness to take the blades, among other things. Transportation costs can be significant as well.

GE announced last year they would begin a program that included blade recycling in Missouri. The GE program utilizes blades in a process which the blades are a replacement for coal, silica, limestone, and other materials in the manufacturing of cement (not concrete). Again, this program is still in its infancy, and I am told comes at an upfront cost.

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It could very well be the case that future decommissioning plans contain recycling as an option, with firm pricing, etc. We don't feel confident enough at the present to include recycling in this plan at this time.

Very truly yours,

MAY, ADAM, GERDES & THOMPSON LLP

A handwritten signature in cursive script, appearing to read "Brett Koenecke".

BRETT KOENECKE
BK | jrw