



Willow Creek Wind Power LLC
Pier 1, Bay 3
San Francisco, CA 94111

www.patterndev.com

October 31, 2018

Mr. Matt Marsh
Environmental Manager
Western Area Power Administration – Upper Great Plains Region
2900 4th Avenue North
Billings, MT 59101-1266

Re: Willow Creek EA – Layout Update

Dear Mr. Marsh,

On June 26, 2018 Burns & McDonnell, on behalf of Willow Creek Wind Power LLC, submitted a supplemental analysis memo (the “Memo”) to the Western Area Power Administration – Upper Great Plains office (“WAPA”) describing proposed changes to the Willow Creek Wind Energy Facility (the “Project”).

In WAPA’s response letter, dated October 1, 2018, (the “Response Letter”) WAPA determined the changes are not substantially relevant to environmental concerns, and there are no new significant circumstances or information relevant to environmental concerns or having bearing on the proposed action. Thus, a supplemental analysis is not required and no further NEPA documentation will be prepared.

As the Project works through final design and procurement processes the Project has continued to look for ways to maintain or reduce the impacts analyzed by WAPA that led to the Finding of No Significant Impact in November of 2016 (the “FONSI”) as well as the supplemental letter in October 2018 described above.

The Project is notifying WAPA that the GE 2.5-127 turbine described and analyzed in the Memo may be modified to be a GE 2.82-127 turbine. This change increases the capacity of each turbine from 2.5 megawatts per turbine to 2.82 megawatts per turbine. Because the individual turbines have a higher rated capacity, this allows the Project to reduce the overall number of turbines needed to achieve approximately the same total rated capacity of the Project.

In regard to the technical specifications of the GE 2.82-127 turbine, the specifications outlined in Table 1 of the Memo for the GE 2.5-127 turbine are the same as the GE 2.82-127 turbine, including having the same sound profile. Therefore the impacts analyzed by WAPA and outlined in the Response Letter are also applicable to a scenario involving the GE 2.82-127 turbine in combination with the previously permitted GE 2.3-116 turbine.

For additional clarity, the Project is not proposing to move any turbines from the original 45 turbine locations approved in the FONSI or use any different road or collection corridors than what was

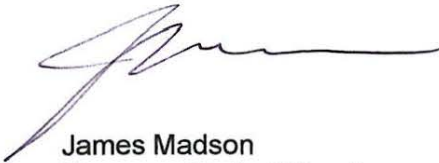
presented in the Memo. If the Project chooses to utilize a combined GE 2.3-116 and GE 2.82-127 design then the change from the combined GE 2.3-116 and GE 2.5-127 design would be to simply reduce the number of turbines as well as reduce the associated access roads and underground electric collection system cabling, therefore further reducing the impacts of the Project.

So the modified list of turbine combination scenarios is as follows:

1. 44 Turbine Layout: 31 GE 2.3-116 turbines and 13 GE 2.5-127 turbines
2. 42 Turbine Layout: 7 GE 2.3-116 turbines and 35 GE 2.5-127 turbines
3. 38 Turbine Layout: 7 Siemens 2.415-108 and 31 Siemens 2.75-129 turbines
4. 38 Turbine Layout: 5 GE 2.3-116 turbines and 33 GE 2.82-127 turbines

As outlined in the Memo, the Project is in the final stages of decision making, including the most appropriate allocation of these turbines and the combinations of turbine models and expects to select a final design prior to the end of 2018.

Sincerely,



James Madson
Manager, Project Development
James.Madson@PatternEnergy.com