

August 10, 2018

VIA ELECTRONIC FILING

Ms. Patricia Van Gerpen
Executive Secretary
South Dakota Public Utilities Commission
500 E Capitol Ave
Pierre, SD 57501-5070

RE: In the Matter of the Application by Prevailing Wind Park, LLC for a Permit of a Wind Energy Facility in Bon Homme County, Charles Mix County and Hutchinson County, South Dakota, for the Prevailing Wind Park Project Docket EL18-026

Dear Ms. Van Gerpen:

In connection with the above-referenced matter, enclosed please find the following documents:

1. Prefiled Supplemental Direct Testimony of Bridget Canty, with exhibit;
2. Prefiled Supplemental Direct Testimony of Peter Pawlowski, with exhibits;
3. Prefiled Supplemental Direct Testimony of Michael MaRous, with exhibits;
4. Prefiled Supplemental Direct Testimony of Dr. Mark Roberts, with exhibits;
5. Prefiled Supplemental Direct Testimony of Daniel Pardo, with exhibits; and
6. Certificate of Service.

If you have any questions, please let me know.

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Minneapolis, Minnesota
55402-1425

Ms. Patricia Van Gerpen
August 10, 2018
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Sincerely,

/s/ Lisa Agrimonti

Lisa Agrimonti
Attorney at Law

Direct Dial: 612.492.7344

Email: lagrimonti@fredlaw.com

Enclosures

cc: Certificate of Service/Service List (*via e-mail*)

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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION BY PREVAILING WIND PARK, LLC
FOR A PERMIT FOR A WIND ENERGY FACILITY IN BON HOMME, CHARLES MIX,
AND HUTCHINSON COUNTIES, SOUTH DAKOTA, FOR PREVAILING WIND
PARK ENERGY FACILITY**

SD PUC DOCKET EL18-026

PRE-FILED SUPPLEMENTAL DIRECT TESTIMONY OF BRIDGET CANTY
ON BEHALF OF PREVAILING WIND PARK, LLC

August 10, 2018

1 **I. INTRODUCTION**

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3 **Q. Please state your name.**

4 A. My name is Bridget Canty.

5

6 **Q. Did you provide Direct Testimony in this docket on May 30, 2018?**

7 A. Yes.

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9 **Q. What is the purpose of your Supplemental Direct Testimony?**

10 A. I will address the following topics in my Supplemental Direct Testimony:

- 11 • An update regarding the wetland and cultural resource survey work for the
- 12 Prevailing Wind Park Project (“Project”);
- 13 • Lisa Schoenfelder’s comments at the July 12, 2018, public input meeting
- 14 regarding the identification of her residence; and
- 15 • The National Telecommunications and Information Administration’s (“NTIA”)
- 16 review of the Project.

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18 **Q. What exhibits are attached to your Supplemental Direct Testimony?**

19 A. The following exhibit is attached to my Supplemental Direct Testimony:

- 20 • Exhibit 1: NTIA correspondence regarding the Project, dated June 7, 2018.

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22 **II. WETLAND AND CULTURAL RESOURCE SURVEY UPDATE**

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24 **Q. In your Direct Testimony at page 4, you indicated that wetland field**
25 **delineations for the Project were “in process.” Have wetland field delineations**
26 **now been completed?**

27 A. Yes. Wetland field delineations were completed in June 2018 for the Project. Based
28 on these delineations, the Project will result in no permanent impacts to wetlands
29 and only approximately 18.5 acres of temporary impacts. Prevailing Wind Park will
30 utilize best management practices (such as the use of construction mats) to mitigate
31 potential temporary impacts.

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Q. In your Direct Testimony at page 4, you indicated that the cultural resources archaeological survey was pending. Do you have an update?

A. Yes. To date, the archaeological survey has included three mobilizations: June 11-15, June 18-27, and July 9-18, 2018. During those mobilizations, pedestrian field surveys were completed in all portions of the Project Area for which access was confirmed. Only one newly-documented archaeological site was identified; this site consists of a historic artifact scatter and foundations, and additional survey and shovel testing will be completed in this area during the next archaeological mobilization.

Q. Does Prevailing Wind Park intend to do additional cultural resources archaeological survey?

A. Yes. The next archaeological mobilization will focus on shovel testing at 16 areas, including the newly-documented archaeological site referenced above, consisting of approximately 39 acres (less than five percent of the Project Area). Prevailing Wind Park will continue to coordinate with the South Dakota Historic Preservation Office (“SHPO”) regarding these surveys.

In addition, Prevailing Wind Park is coordinating with the Western Area Power Administration (“WAPA”) to support WAPA’s compliance with Section 106 of the National Historic Preservation Act. As part of the Section 106 process, Prevailing Wind Park anticipates that certain interested tribes will conduct a Traditional Cultural Properties survey in the Project Area this fall.

Q. Your Direct Testimony at page 5 also indicated that the historical/architectural survey was pending. Do you have an update?

A. Yes. The historical/architectural survey is currently underway and is expected to be completed in September 2018. Prevailing Wind Park will coordinate with SHPO regarding this survey, as well.

63 **III. RESIDENCE IDENTIFICATION**

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65 **Q. At the July 12, 2018, public input meeting, Ms. Lisa Schoenfelder noted that**
66 **the Project maps did not include her residence in the vicinity. Have you**
67 **investigated this issue?**

68 A. Yes. Prevailing Wind Park recognizes that Ms. Schoenfelder's residence at 40228
69 296th Street, Wagner, South Dakota, was not identified in the maps submitted with
70 the Project's Application. However, we have determined that the owner of record of
71 Ms. Schoenfelder's residence was sent the required notice of the public input
72 hearing for Project. Ms. Schoenfelder's residence is approximately 4,200 feet away
73 from turbine 58, which is the nearest proposed turbine location to the residence.
74 Additionally, based on the shadow flicker level contours shown in Appendix G
75 (Shadow Flicker Duration Maps) to the Shadow Flicker Analysis report already
76 prepared for the Project, Ms. Schoenfelder's residence would experience less than
77 30 hours of shadow flicker per year from the Project. Also, based on Appendix D
78 (Sound Level Contours) to the Sound Study already prepared for the Project, sound
79 levels from the Project at Ms. Schoenfelder's residence would be less than 45 dBA.
80 Prevailing Wind Park continues to investigate the reason that Ms. Schoenfelder's
81 residence was not previously included, and will provide an update in further
82 testimony.

83

84 **IV. NTIA CORRESPONDENCE**

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86 **Q. On page 15-17 of the Application, it notes that Prevailing Wind Park submitted**
87 **a notification to NTIA and expected a determination in early June 2018. Do**
88 **you have an update?**

89 A. Yes. In correspondence dated June 7, 2018, NTIA indicated that the Department of
90 Energy ("DOE") "identified concerns regarding blockage of their radio frequency
91 transmissions." A copy of the NTIA correspondence is attached as Exhibit 3. DOE
92 requested that Prevailing Wind Park coordinate with WAPA's Western Spectrum
93 Program Manager.

94

95 **Q. Has Prevailing Wind Park initiated coordination with WAPA?**

96 A. Prevailing Wind Park has directed its consultant to coordinate with WAPA regarding
97 this issue. On August 8, the Project's consultant sent a letter via electronic mail to
98 WAPA's Western Spectrum Program Manager requesting additional review per the
99 NTIA response letter.

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101 **V. CONCLUSION**

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103 **Q. Does this conclude your Supplemental Direct Testimony?**

104 A. Yes.

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106 Dated this 10th day of August, 2018.

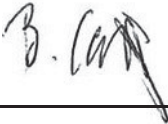
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Bridget Canty



JUN - 7 2018

Mr. B. Benjamin Evans, P.E.
Evans Engineering Solutions, LLC
524 Alta Loma Drive
Thiensville, WI 53092

Re: Prevailing Wind Project, Revision 1: Bon Homme, Charles Mix & Hutchinson
Counties, SD

Dear Mr. Evans:

In response to your request on April 4, 2018, the National Telecommunications and Information Administration provided to the federal agencies represented in the Interdepartment Radio Advisory Committee (IRAC) the plans for the Prevailing Wind Project, Revision 1, located in Bon Homme, Charles Mix, and Hutchinson Counties, South Dakota.

After a 45+ day period of review, one Federal agency, the Department of Energy (DOE), identified concerns regarding blockage of their radio frequency transmissions. Energy's concerns are noted here:

This project has the potential to affect operations of the DOE Western Area Power Administration, and turbine location data will be necessary for mitigation purposes. Energy requests that the developer coordinate directly with our Western Spectrum Program Manager:

Scott E. Johnson, Sr. Telecom Engineer/Spectrum Program Manager
US Dept. of Energy, Western Area Power Admin Headquarters, P. O. Box
281213, Lakewood, Colorado 80228-8213
Phone: (720) 962-7380; Fax: (720) 962-4080; email: sjohnson@wapa.gov

While the other IRAC agencies did not identify any concerns regarding radio frequency blockage, this does not eliminate the need for the wind energy facilities to meet any other requirements specified by law related to these agencies. For example, this review by the IRAC does not eliminate any need that may exist to coordinate with the Federal Aviation Administration concerning flight obstruction.

Thank you for the opportunity to review these proposals.

Sincerely,

Peter A. Tenhula
Deputy Associate Administrator
Office of Spectrum Management