

RICHARD A. CUTLER  
KENT R. CUTLER  
BRIAN J. DONAHOE \*\*  
STEVEN J. SARBACKER \*\*  
JAYNA M. VOSS  
MICHAEL D. BORNITZ ‡  
TRENT A. SWANSON \*  
RYAN J. TAYLOR °  
KIMBERLY R. WASSINK  
MEREDITH A. MOORE  
DAVID L. EDWARDS  
NATHAN S. SCHOEN ††  
ONNA B. HOUCK #  
DAVID L. REZAC

CUTLER & DONAHOE, LLP  
ATTORNEYS AT LAW

Telephone (605) 335-4950

Fax (605) 335-4961

[www.cutlerlawfirm.com](http://www.cutlerlawfirm.com)

September 6, 2006

JEAN BROCKMUELLER, CPA (Inactive)  
BUSINESS MANAGER

\*Also licensed to practice  
in Minnesota

#Also licensed to practice  
in Iowa

‡Also licensed to practice  
in Nebraska

+Also licensed to practice  
in Missouri

†Admitted to practice in  
United States Tax Court

\*Also licensed as a  
Certified Public Accountant

Ms. Patricia Van Gerpen  
Executive Director  
South Dakota Public Utilities Commission  
State Capitol Building  
500 East Capitol Avenue  
Pierre, SD 57501-5070

RECEIVED  
SEP 11 8 2006  
SOUTH DAKOTA PUBLIC  
UTILITIES COMMISSION

Re: Docket No. EL06-020  
Application of Interstate Telecommunications  
Cooperative, Inc. for Party Status  
Our File No. 2240.04

Dear Ms. Van Gerpen:

Please find enclosed for filing one original and eleven copies of the Application of Interstate Telecommunications Cooperative, Inc. for Party Status. Please return one file-stamped copy in the enclosed self-addressed, stamped envelope. Also please find enclosed a Certificate of Service signed by Ryan J. Taylor.

If you have any questions regarding this filing or require any clarification or further information, please feel free to contact me at your earliest convenience at (605) 335-4989. Thank you for your assistance and consideration in this matter.

Sincerely,

CUTLER & DONAHOE, LLP



Ryan J. Taylor  
For the Firm

RJT:dah  
Enclosures  
cc: Jerry Heiberger

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA

RECEIVED  
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SOUTH DAKOTA PUBLIC  
UTILITIES COMMISSION

In the Matter of the Application by Navitas Energy, Inc. for an Energy Conversion Facility Permit for the Construction of the White Wind Farm and Associated Collection Substation and Electric Interconnection System

Docket No.: EL06-020

**APPLICATION OF INTERSTATE  
TELECOMMUNICATIONS  
COOPERATIVE, INC. FOR PARTY  
STATUS**

COMES NOW, Interstate Telecommunications Cooperative, Inc., by and through its undersigned counsel, and pursuant to A.R.S.D. 20:10:22:40, hereby files this Application to obtain party status in above-entitled proceeding.

IN SUPPORT THEREOF, Petitioner states and declares as follows:

1. Interstate Telecommunications Cooperative, Inc. (hereinafter "ITC") is a South Dakota cooperative corporation headquartered in Clear Lake, South Dakota. ITC presently operates twenty-six (26) local telephone exchanges serving approximately 14,232 access lines in the State of South Dakota. The local telephone exchanges operated by ITC include Brookings (rural) and White, South Dakota.
2. White Wind Farm, LLC, a wholly owned subsidiary of Navitas Energy, Inc., is a Minnesota limited liability company, authorized to do business in the State of South Dakota, with its primary place of business in Minneapolis, Minnesota.
3. White Wind Farm, LLC has submitted an application to this Commission for an energy conversion facility permit to construct and operate a wind farm consisting of the construction, operation, and maintenance of electric collector lines, a collection substation and an interconnection to the White Substation; construction, operation and maintenance up to 105 2-MW wind turbine generators (hereinafter "WTGs"), and construction and maintenance of access

roads connecting the WTGs. This proposed facility would be located in eastern Brookings County, South Dakota and southeast of the City of White, South Dakota and would fall within the Brookings (rural) and White, South Dakota local telephone exchanges.

4. Specifically, White Wind Farm, LLC proposes to construct certain electrical power collection circuit facilities including 45 miles of underground collection lines and 9 miles of overhead collection lines and 105 WTGs in the proposed siting area. The construction of the proposed electric facilities and WTGs in close proximity to ITC's telephony facilities may result in the interruption of service or otherwise disrupt ITC's services because these electric collector facilities and WTGs have been found to cause harmonic induction noise as noted in SDCL 49-32-3.1. Increased levels of these static and background noises are a serious threat to public safety and any successful mitigation measures are extremely expensive.

5. Any person within the meaning of the South Dakota Energy Facility Permit Act (hereinafter "Act") who resides within the proposed facility siting area is a party to this proceeding upon the timely submission of an application for party status. Pursuant to the requirements of the Act and applicable regulations, ITC is eligible to apply for party status in the above-entitled proceeding as it is both a person as defined in SDCL 49-41B-2 (7) and required by SDCL 49-41B-17 (3). Because ITC's service area extends through the proposed siting area, ITC is also a resident of the area as required by SDCL 49-41B-17 (3). Lastly, this application for party status has been submitted to this Commission prior to September 11, 2006 deadline as prescribed in this Commission's Order dated August 15, 2006.

6. ITC submits this application for party status as it has a direct and substantial interest in these proceedings. This Commission's decisions regarding the Application submitted by White Wind Farm, LLC may, directly or indirectly, affect the quality of the

telecommunications services provided by ITC to those consumers in its service areas within and surrounding the siting area.

7. ITC desires party status in this proceeding in order that it might receive documents, comment, present testimony, cross-examine witnesses, and produce evidence, in the event that such actions are required, to ensure it may continue to provide quality and uninterrupted telecommunications services to those subscribers residing in the proposed siting area.

WHEREFORE, ITC respectfully requests that the Commission grant its Application for Party Status pursuant to A.R.S.D. 20:10:22:40 and authorize it to participate in the above-entitled proceeding with full rights as a formal party.

Dated this 6<sup>th</sup> day of September, 2006.

CUTLER & DONAHOE, LLP



Ryan J. Taylor  
Onna B. Houck  
100 N. Phillips Ave., 9<sup>th</sup> Floor  
Sioux Falls, SD 57104  
Telephone: 605-695-9512  
Facsimile: 605-335-4961  
Attorneys for Applicants

Subscribed and sworn before me on this 6<sup>th</sup> day of September, 2006.

[ SEAL ]



Jeannie Anderson  
Notary Public—State of South Dakota  
My Commission Expires: 8-25-12

