

**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 OF  
A WIND ENERGY FACILITY IN BON  
HOMME COUNTY, CHARLES MIX  
COUNTY AND HUTCHINSON  
COUNTY, SOUTH DAKOTA, FOR  
THE PREVAILING WIND PARK  
PROJECT**

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**APPLICANT’S RESPONSES TO  
INTERVENORS’ SECOND SET OF  
DATA REQUESTS  
EL 18-026**

Below, please find Applicant’s responses to Intervenors’ Second Set of Data Requests to Applicant.

**Objections to Definitions**

Prevailing Wind Park objects to the definitions of “You” and “Your”. For purposes of these responses, “You” and “Your” shall refer to Prevailing Wind Park, LLC, the applicant in this matter and its parent company, sPower Development Company, LLC, and any employees thereof.

**2-1) Provide the application for a Large Wind Energy System Permit You submitted to Bon Homme County.**

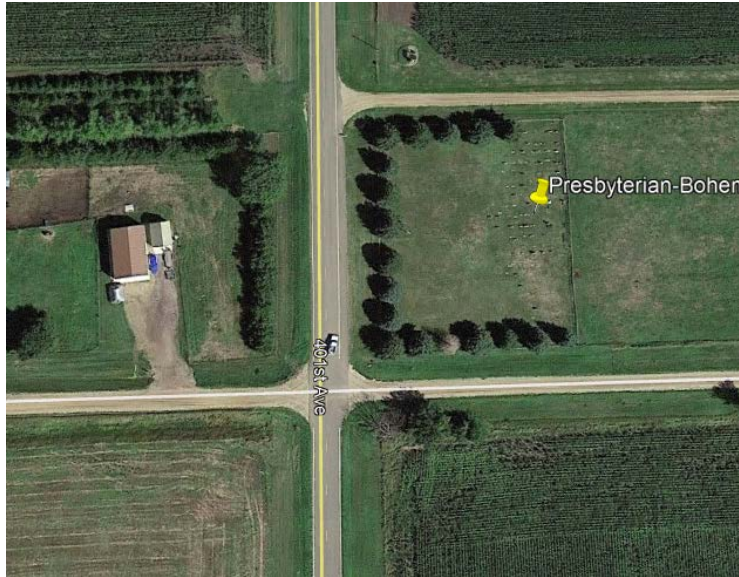
Peter Pawlowski: The application is available at:  
<https://fredriksonandbyron.sharefile.com/d-sf499da35c754466a>

**2-2) Provide any application You have submitted to Bon Homme County, Charles Mix County, or Hutchinson County.**

Peter Pawlowski: Responsive documents are available at  
<https://fredriksonandbyron.sharefile.com/d-sf499da35c754466a>

**2-3) What is the modeled noise level and shadow flicker at the Presbyterian-Bohemian Cemetery located at the intersection of 401st Avenue and 295th Street near turbines 48 and 57?**

Aaron Anderson: Assuming the figure below shows the Presbyterian-Bohemian Cemetery, the Project will result in approximately 10 hours per year of shadow flicker at the Presbyterian-Bohemian Cemetery using the GE 3.8-137 model.



Chris Howell: The noise modeling for the GE 3.8-137 turbine predicts a sound level from turbines of 33.8 dBA at this location.

- 2-4) **Provide a map that shows the proposed turbines within 2 miles from the residence of Ms. Kelly Pazour (29668 402nd Avenue, Wagner, South Dakota 57380) and the applicable setbacks for those turbines, similar to the map on Page 88 of 156 of Staff Exhibit\_JT-1 in Docket EL18-003 for Ms. Teresa Kaaz (<http://puc.sd.gov/commission/dockets/electric/2018/EL18-003/exhibits/staff/sl.pdf>).**

Bridget Canty: See Attachment 2-4 for turbine locations. For setbacks, see Figure 5 in the Application.

- 2-5) **Provide a map that shows the proposed turbines within 2 miles from the residence of Mr. Jerome Powers (40427 294th Street, Wagner, South Dakota 57380) and the applicable setbacks for those turbines, similar to the map on Page 88 of 156 of Staff Exhibit\_JT-1 in Docket EL18-003 for Ms. Teresa Kaaz (<http://puc.sd.gov/commission/dockets/electric/2018/EL18-003/exhibits/staff/sl.pdf>).**

Bridget Canty: See Attachment 2-5 for turbine locations. For setbacks, see Figure 5 in the Application.

- 2-6) **Provide a map that shows the proposed turbines within 2 miles from the residence of Mr. Kevin Andersh and the applicable setbacks for those turbines, similar to the map on Page 88 of 156 of Staff Exhibit\_JT-1 in Docket EL18-003 for Ms. Teresa Kaaz (<http://puc.sd.gov/commission/dockets/electric/2018/EL18-003/exhibits/staff/sl.pdf>).**

Bridget Canty: See attachment 2-6 for turbine locations. For setbacks, see Figure 5 in the Application.

- 2-7) **Provide a map that shows the proposed turbines within 2 miles from the residence of Mr. Gregg Hubner (29976 406th Avenue, Avon, South Dakota 57315) and the applicable setbacks for those turbines, similar to the map on Page 88 of 156 of Staff Exhibit JT-1 in Docket EL18-003 for Ms. Teresa Kaaz (<http://puc.sd.gov/commission/dockets/electric/2018/EL18-003/exhibits/staff/sl.pdf>).**

Bridget Canty: See response to Staff Request DR 2-23.

- 2-8) **Provide a map that shows the proposed turbines within 2 miles from the residence of Mr. Paul Schoenfelder (40228 296th Street, Wagner, South Dakota 57380) and the applicable setbacks for those turbines, similar to the map on Page 88 of 156 of Staff Exhibit JT-1 in Docket EL18-003 for Ms. Teresa Kaaz (<http://puc.sd.gov/commission/dockets/electric/2018/EL18-003/exhibits/staff/sl.pdf>).**

Bridget Canty: See response to Staff Request DR 2-24.

- 2-9) **Appendix T, page 84 email from Jennifer Bell to Bridget Canty on the subject of Prevailing Winds Tribal Meeting dated Monday, March 26, 2018 10:02:20 AM. Please provide any additional correspondence between Kip Spotted Eagle and/or the leadership of the Yankton Sioux Tribe, including any agreements made in regards to cultural discoveries during the construction of the Prevailing Winds Park project.**

Lisa Agrimonti: Prevailing Wind Park objects to this request because it is overbroad and ambiguous regarding the parties to the requested communications. Prevailing Wind Park further objects to this request to the extent that it seeks confidential information.

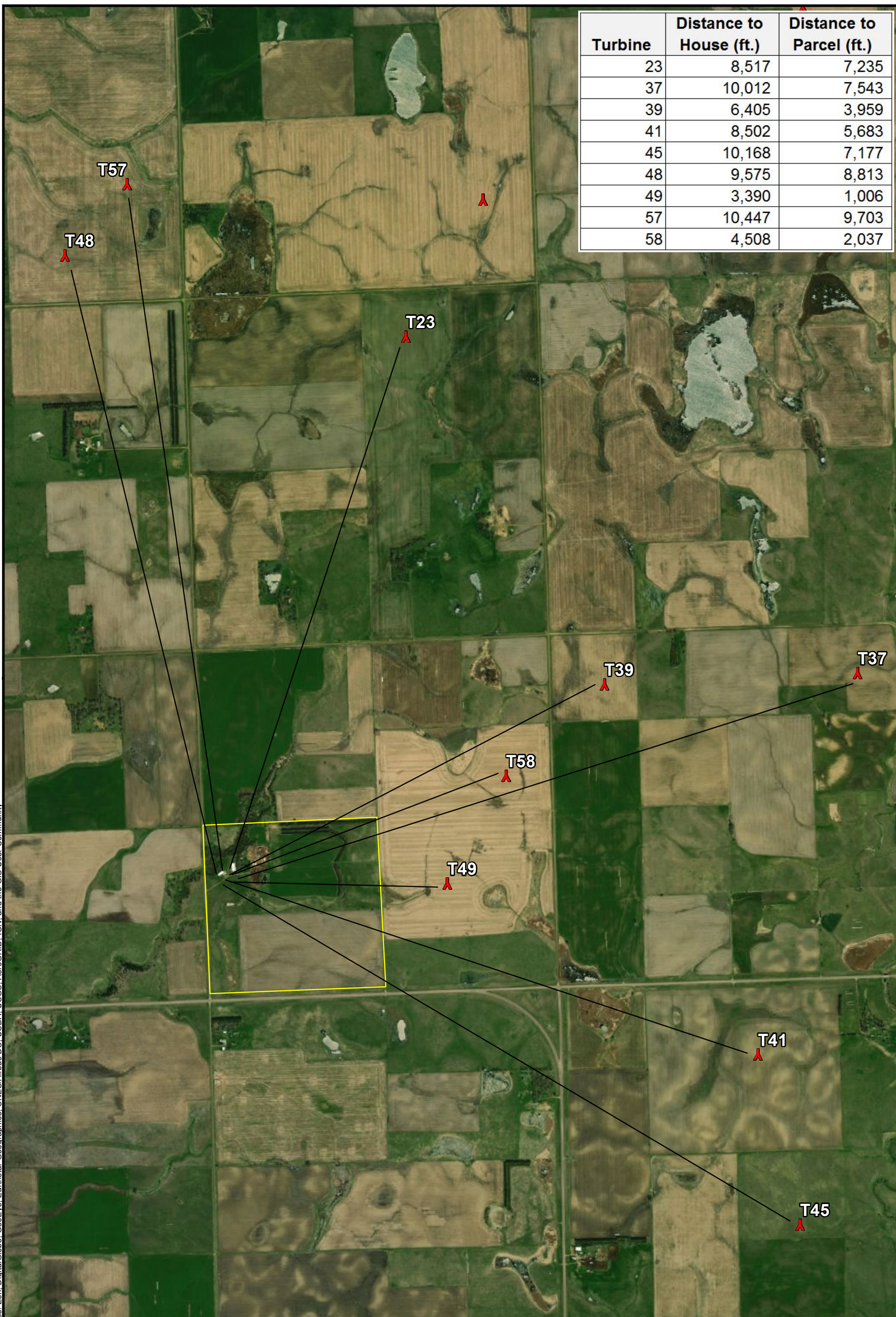
Dated this 24th day of September,  
2018.

By: /s/ Lisa M. Agrimonti

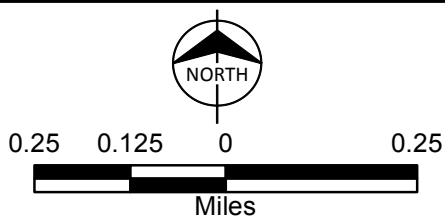
Mollie M. Smith  
Lisa M. Agrimonti  
FREDRIKSON & BYRON, P.A.  
Attorneys for Applicant  
200 South Sixth Street, Suite 4000  
Minneapolis, MN 55402  
Phone: (612) 492-7270  
Fax: (612) 492-7077

64809191.1

Turbine	Distance to House (ft.)	Distance to Parcel (ft.)
23	8,517	7,235
37	10,012	7,543
39	6,405	3,959
41	8,502	5,683
45	10,168	7,177
48	9,575	8,813
49	3,390	1,006
57	10,447	9,703
58	4,508	2,037



▲ Wind Turbine  
 □ Parcel Boundary






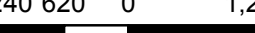
Brown Residence (Pazour)  
 29668 402nd Avenue  
 Charles Mix County  
 South Dakota  
**Page 5 of 9**

Turbine	Distance to House (ft.)	Distance to Parcel (ft.)
T1	10,066	9,671
T3	7,378	6,960
T5	7,949	7,417
T7	5,105	4,510
T8	4,812	4,470
T9	2,979	2,554
T12	2,173	1,510
T15	6,468	6,005
T16	7,837	7,555
T17	7,573	6,874
T22	8,570	8,075
T29	6,547	5,871



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 COPYRIGHT © 2018 BURNS & McDONNELL ENGINEERING COMPANY, INC.  
 Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

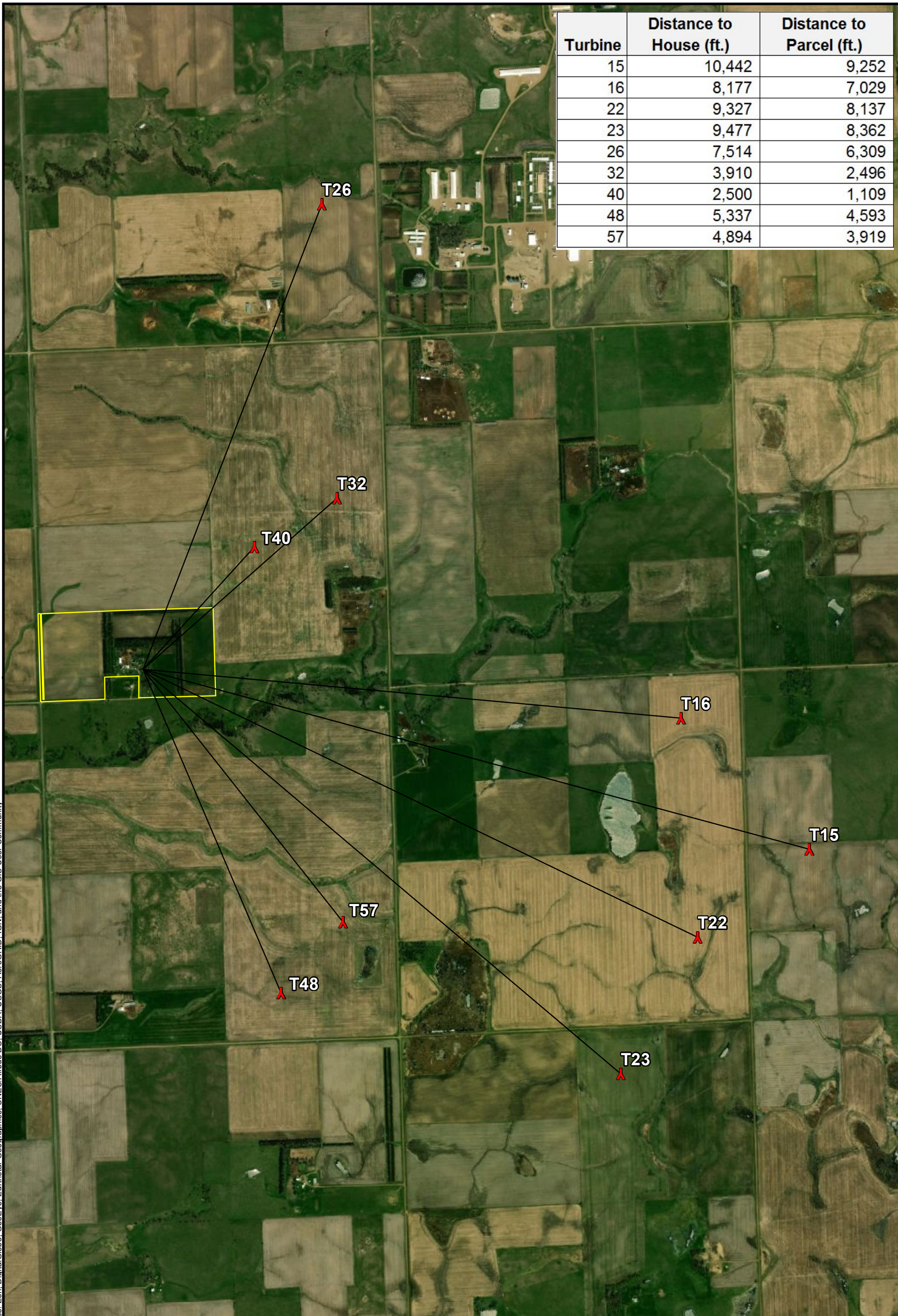
 Wind Turbine  
 Parcel Boundary

  
 1,240 620 0 1,240  
  
 Scale in Feet





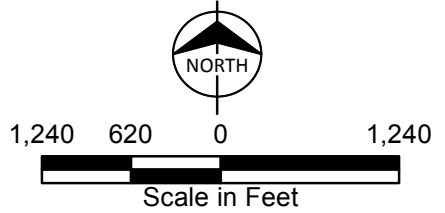
Residence of  
 Mr. Jerome Powers  
 40427 294th Street  
 Charles Mix County  
 South Dakota  
**Page 6 of 9**

Turbine	Distance to House (ft.)	Distance to Parcel (ft.)
15	10,442	9,252
16	8,177	7,029
22	9,327	8,137
23	9,477	8,362
26	7,514	6,309
32	3,910	2,496
40	2,500	1,109
48	5,337	4,593
57	4,894	3,919



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 COPYRIGHT © 2018 BURNS & McDONNELL ENGINEERING COMPANY, INC.  
 Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

 Wind Turbine  
 Parcel Boundary



Residence of  
 Kevin & Georgia Andersh  
 40128 294th Street  
 Charles Mix County  
 South Dakota  
**Page 7 of 9**

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

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**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  
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**CERTIFICATE OF SERVICE**

**EL18-026**

Bridget A. Duffus, of Fredrikson & Byron, P.A., hereby certifies that on the 24th day of September, 2018, true and correct copies of the following documents were served electronically on the persons listed below:

1. Applicant’s Responses to Intervenors’ Second Set of Data Requests; and
2. Certificate of Service.

Ms. Kristen Edwards Staff Attorney South Dakota Public Utilities Commission 500 E. Capitol Ave. Pierre, SD 57501 Kristen.edwards@state.sd.us	Ms. Amanda Reiss Staff Attorney South Dakota Public Utilities Commission 500 E. Capitol Ave. Pierre, SD 57501 amanda.reiss@state.sd.us
Mr. Darren Kearney Staff Analyst South Dakota Public Utilities Commission 500 E. Capitol Ave. Pierre, SD 57501 darren.kearney@state.sd.us	Mr. Jon Thurber Staff Analyst South Dakota Public Utilities Commission 500 E. Capitol Ave. Pierre, SD 57501 jon.thurber@state.sd.us
Ms. Lisa M. Agrimonti - Representing: Prevailing Wind Park, LLC Attorney Fredrickson & Byron, P.A. 200 South Sixth St., Ste. 4000 Minneapolis, MN 55402-1425 lagrimonti@fredlaw.com	Ms. Mollie Smith - Representing: Prevailing Wind Park, LLC Fredrikson & Byron, P.A. 200 S. 6th St., Ste. 4000 Minneapolis, MN 55402 msmith@fredlaw.com
Reece M. Almond – Representing: Gregg C. Hubner, Marsha Hubner, Paul M. Schoenfelder, and Lisa A. Schoenfelder Davenport, Evans, Hurwitz & Smith. LLP 206 West 14th Street	



P.O. Box 1030 Sioux Falls, SD 57101 ralmond@dehs.com	
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*/s/ Bridget A. Duffus* \_\_\_\_\_  
Bridget A. Duffus