

**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**

**Amended Response
APPLICANTS FIRST SET OF DATA
REQUESTS TO
INTERVENOR**

Below, please find Prevailing Wind Park, LLC's ("Applicant") First Set of Data Requests to Intervenor Karen Jenkins. Please submit responses within 10 business days or promptly contact the undersigned to discuss an alternative arrangement.

1-1) Provide copies of all data requests submitted by the PUC Staff to you in this proceeding and copies of all responses to those data requests. Provide this information to date and on an ongoing basis.

Attached

1-2) With respect to the Project, please:

a) Identify, if any, concerns you have regarding the Project's satisfaction of the criteria for the Project to receive a facility permit from the South Dakota Public Utilities Commission; and b) Identify any other concerns you have regarding the Project.

Please see my Amended Response to Staff's First Set of Data Requests that I have forwarded to you.

1-3 Identify whether you own property or reside in the vicinity of the Prevailing Wind Park Project ("Project") and, if so, the location (by section, township, and range) of such property and/or residence.

My husband and I own an 8 acre property with a 100+ year old farmhouse and barn with outbuildings in Section 30 Fair Township 97N, and Range 60W.

1-4 If you have a residence in the vicinity of the Project, identify whether you live at the residence throughout the entire year and, if not, how many months of the year you reside at the residence.

We reside here year round.

1-5 Identify how you use your land, including, but not limited to, whether you use your land for agricultural purposes.

We use our land as our sanctuary from urban living and as a Hobby Farm. We also hay some of the acreage every year.

1-6 Identify any sensitive or unique features of your property that you assert would be impacted by the Project.

Our property has a unique 360 degree view of the landscape and our two story house has many large windows and doors on every side which afford us a beautiful and peaceful view of the rural landscape which includes tilled farmland, pastures with cattle grazing, a wide open view of the sky, and many types of wildlife including a large variety of birds, including bald eagles, cranes, the twice yearly migration of ducks and geese, deer, woodchucks, raccoons, coyotes, badgers, rabbits, quail, and pheasants. There is a naturally fed pond just west of our house on the adjacent property and a creek that runs from that, through our property and on to the property east of us which becomes tree-lined and feeds a pond on that property. Both properties east and west have cows and calves grazing most of the year. The adjacent north and south properties are tilled farmland which alternate from corn, soybeans, and alfalfa.

Our property fulfills the dream we have shared since we married in 1984, to retire and live in the country, experience the seasons, enjoy the peacefulness, have a hobby farm, and enjoy life. We believed we would be able to either leave a beautiful and valuable property to our children as an inheritance or if needed, as we age and become unable to maintain it, be able to sell it and use the funds from the sale to relocate to another lovely residence.

1-7) Describe any mitigation measures that could address your concerns with respect to the Project.

Please refer to my Amended Response to Staff's First Request for Data that I have forwarded to you.

1-8) Identify any documents, information, education, training, or professional experience you have relied upon to form your opinions concerning the Project. Where you have relied upon documents or other tangible materials, please provide such documents and/or materials.

My personal experience of the process of the development of the Beethoven Wind Farm and this Project.

My personal experience of living three miles from the Beethoven Wind Farm.

The experiences that Sherm and Lori Fuerniss have shared with me living by the Beethoven Wind Farm.

Discussions I have had with individuals who live in the communities surrounding us regarding the offensive red blinking lights seen for miles and miles, the waste of our taxpayer dollars, the secrecy of the developers of the Beethoven Project (the same developers of the Project), and the disgust of how they deceived the communities that the Beethoven Project would provide many permanent jobs to the community.

Documents and Literature

Siting Guidelines for Wind Power Projects in South Dakota / Attached

Particularly, the following paragraph was alarming to me and had a great impact on the opinion I have that the Project is proposed for the wrong location. This project is in the Missouri River area highlighted on the map, an area that is considered unique and rare in South Dakota.

“Although wind power is considered "green energy," many concerns have been expressed about the effects of their presence on plants and animals native to South Dakota. Specific areas of South Dakota have been identified as potential sites for wind energy development, and these sites are located in, but not limited to, the Coteau des Prairies in eastern South Dakota and the Missouri River in central South Dakota, which are unique/rare in South Dakota. Additional areas in other regions of the state may be identified/added by ongoing studies or further infrastructure development (e.g., transmission lines and substations). “

Wind Turbine Syndrome: A Report on a Natural Experiment by Dr. Nina Pierpont

Paradise Destroyed

The Destruction of Rural Living by the Wind Energy Scam by Gregg Hubner

Websites:

SDPUC

AWEA / Too many articles and too much info to attach.

WE-CAREsd.org website / Too many articles and too much info to attach

Wind Watch.org website / Too many articles and too much info to attach

INCEEUROPE website / Three attachments

1-9) Identify any expert witnesses you plan to have testify on your behalf, and for each expert witness, describe the subject matter regarding which the witness will testify.

My husband Mike Jenkins and myself may testify on our experiences of and with the Beethoven Wind Farm and the development of the Project, at this time no other expert witnesses are planned, however I reserve the right to call witnesses as the process unfolds.

1-10) Are you asserting the Project will negatively impact property value? If so, provide copies of any appraisals that have been conducted for your property within the last ten (10) years.

Yes, I am sure the Project will negatively impact property value. More concerning is the chance that one or both of us may not be able to remain in our home, due to adverse health effects, or whether we would even want to remain in our home next to the existing Beethoven Wind Farm and this Project. Most concerning is how we could ethically offer it up to anyone for sale. We depend on our home and property as our largest asset.

An appraisal was done when we purchased our home and property in 2010, I do not have it available.

1-11) Identify any communications, written or otherwise, you have had with units, officials, and/or representatives of local, state, and/or federal governments or agencies concerning the Project.

I participated in the process of the Bon Homme County Zoning Board on Zoning and Met Tower, and Public Hearings in the same County regarding zoning for Industrial Wind Towers.

I attended the Charles Mix County Commissioners regular hearing on August 9, 2018.

I presented to the Hutchinson County Zoning Board my concerns of the deception of the developer of the Project at the regular August 2, 2018 meeting.

I presented to the Hutchinson County Board of Adjustment my request for protection, for their strong consideration of the concerns I had, and the conditions I felt needed in the event they would not deny the Conditional Use Permit at the Public Hearing on September 4, 2018.

I amend this section to include the attachments and provide unwritten communications information:

- a) For any written communications, provide a copy of the communication; and
Attached
- b) For any unwritten communications, provide the date of the communication, the persons involved, and the subject matter of the communication.

Simple calls to confirm the meetings were on schedule as I live 20 miles from the Hutchinson County Courthouse and the Bon Homme County Courthouse. Dates not available.

I amend this section to include:

A call to Cliff Tjaden Hutchinson Zoning Director to request minutes of the August 6, 2018 regular Zoning Board meeting and the minutes of the September 4, 2018 Public Hearing for the Conditional Use Permit requested by Applicant. I don't remember the date.

A call to Scott Podhradsky, Deputy Attorney for Charles Mix County, to inquire about the agreement the Commissioners entered into with the Applicant. August 13, 2018 I believe.

I had interactions with public employees at Bon Homme County and Hutchinson County Courthouses to request minutes of the Bon Homme County Public Hearing regarding Article 17 that had been posted twice, (but each having a different time for the hearing), to review and obtain public records, and to review the Application.

Dated this 4th day of October, 2018

Karen Jenkins

28912 410th Ave

Tripp SD 57376