

**BEFORE THE 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 PROJECT

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\* **APPLICANT'S FIRST SET OF DATA**  
\* **REQUESTS TO INTERVENOR GREGG**  
\* **HUBNER**  
\* **EL18-026**  
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Below, please find Prevailing Wind Park, LLC's ("Applicant") First Set of Data Requests to Intervenor Gregg Hubner. 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.
- 1-2) In your Application for Party Status in the above-referenced action, it states: "I live and/or own land in close proximity to or within the Project's footprint and have concerns regarding the applicant's compliance with applicable laws and rules; concerns regarding environmental, social, and economic injury the Project will cause; concerns that the Project will impair the health, safety, and welfare of inhabitants of the area; and concerns that the Project will interfere with the orderly development of the region." With respect to above, please respond to the following:
  - a) Identify with specificity your "concerns regarding the applicant's compliance with applicable laws and rules."
  - b) Identify with specificity your "concerns regarding environmental, social, and economic injury the Project will cause."
  - c) Identify with specificity your "concerns that the Project will impair the health, safety, and welfare of inhabitants of the area."
  - d) Identify with specificity your "concerns that the Project will interfere with the orderly development of the region."
- 1-3) Identify the property and/or residence you own and/or reside in within the vicinity of the Prevailing Wind Park Project ("Project") and the location (by section, township, and range) of such property and/or residence.

- 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.
- 1-5) Identify how you use your land, including, but not limited to, whether you use your land for agricultural purposes.
- 1-6) Identify any sensitive or unique features of your property that you assert would be impacted by the Project.
- 1-7) Describe any mitigation measures that could address your concerns with respect to the Project.
- 1-8) Identify any documents, information, education, training, or professional experience you have relied upon to form your opinions concerning the Project as listed in your Application for Party Status. Where you have relied upon documents or other tangible materials, please provide such documents and/or materials.
- 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.
- 1-10) Are you asserting that the Project will negatively impact your property value? If so, provide copies of any appraisals that have been conducted for property identified in response to Data Request 1-3 within the last ten (10) years.
- 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.
  - a) For any written communications, provide a copy of the communication; and
  - b) For any unwritten communications, provide the date of the communication, the persons involved, and the subject matter of the communication.
- 1-12) If you contend that the market value of any property will be diminished on account of the Project, identify the property by street address and/or parcel identification number.

Dated this 10th day of September 2018.

By /s/ Lisa Agrimonti  
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Lisa Agrimonti  
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