

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

**IN THE MATTER OF THE
APPLICATION BY DEUEL HARVEST
WIND ENERGY LLC FOR A PERMIT
OF A WIND ENERGY FACILITY AND
A 345-kV TRANSMISSION LINE IN
DEUEL COUNTY**

* **MOTION TO ALLOW ROBERT RAND**
* **TO APPEAR TELEPHONICALLY**
* **EL18-053**
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I request the Commission grant permission allowing expert witness Robert Rand to testify by telephone for the Evidentiary Hearing scheduled in this matter beginning April 15, 2019, through April 18, 2019.

Robert Rand is from Brunswick, Maine. Traveling to Pierre, South Dakota for the Evidentiary Hearing would be a significant inconvenience, include significant costs, and require time away from his business and other obligations. Robert Rand is a key expert witness regarding the sound effects of the Deuel Harvest project. Mr. Rand has filed testimony to rebut that of Mr. Hankard, Mr. Hessler, Dr. Roberts and Dr. Ellenbogen. If not allowed to testify by telephone, he may not be able to testify at all.

In addition, even if Mr. Rand were available to travel to Pierre to testify, the cost to cover his time and expenses would be prohibitive for me.

Expert witnesses have been permitted to testify telephonically previously in EL 17-055. The telephonic testimony did not create any significant or substantial issues in that proceeding.

For these reasons, I request permission from the Commission to allow Robert Rand to appear telephonically for the Evidentiary Hearing scheduled in this matter April 15 through April 18, 2019.

Dated: April 2, 2019

Respectfully submitted,

/s/ Christina Kilby
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