

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

EL19-003

IN THE MATTER OF THE
APPLICATION BY CROWNED
RIDGE WIND, LLC FOR A
PERMIT OF A WIND ENERGY
FACILITY IN GRANT AND
CODINGTON COUNTIES

AFFIDAVIT

State of South Dakota

County of Codington

Patrick Lynch being first duly sworn upon oath, states and alleges as follows:

1. The undersigned affiant is an Intervenor in this matter and provides this affidavit to the Public Utilities Commission on information and belief and in support of the Intervenor's Motion to Deny and Dismiss the above entitled proceedings. Capitalized terms used to describe matters in this affidavit are the terms as defined in the beginning of Intervenor's Brief in Support of Intervenor's Motion to Deny and Dismiss.

2. Applicant submitted its Application in EL19-003 on January 30th, 2019. That date is an important date for the Commission to consider when ruling on Intervenor's Motion to Deny and Dismiss.
3. An estimated construction cost is not in the Application.
4. The Application at page 17 provides a word salad of things discussing capital costs and attempts to integrate construction cost in that word salad. The description in the Application also confuses things not related to construction cost, for example, "... also includes lease acquisition, permitting, engineering, procurement, and construction of turbines, access roads. . ." Page 17
5. The Applicant in this matter has not submitted information necessary for a local review committee to assess the effects of the Project. No such committee was formed.
6. The "distances between turbines" is not disclosed in the Application.
7. A Met tower is identified in the Application. Page 22 The Applicant has not included information required regarding the tower. The Application does not provide for the width of the tower.
8. The Application also does not disclose conductor configuration and size, length of span between structures, and number of circuits per pole or tower for any electric interconnection facilities. And the Application does not have a designation of distance between access points, conductor configuration and size, and number of circuits on underground equipment. The Application does not disclose this information.
9. The Applicant does not disclose interconnection facilities placed underground

including the distance between access points, conductor configuration in size, and number of circuits. The Applicant has provided underground information on depth only. Page 21

10. The Applicant does not provide setback distances from off-site buildings, right-of-ways of public roads, and property lines in the Application.
11. A document related to this Project identified as a "Memorandum of Leases and Easements" was publicly filed on 5.21.2015 as Document number 229485 with the Grant County South Dakota Register of Deeds. The document identifies a company called Boulevard Associates, LLC as the lessee and also as the "Owner and Operator" of the filed wind farm lease and easement agreement. The Intervenors believe the real estate owner and lessor under this Memorandum of Leases and Easements will provide property to host turbines or related activities regarding the Applicant's proposed Project. The Application does not identify or provide a disclosure regarding a company identified as Boulevard Associates, LLC. Boulevard Associates, LLC is not identified in the Application as an owner or operator of property or of legal rights related to the Project. The owner and manager of the Project is identified as Crowned Ridge Wind, LLC. Page 14 A copy of the Memorandum of Leases is attached to this affidavit as Exhibit A.
12. The Application contains no description of easement or wind tower lease- holding companies and their relationship, if any, with the Applicant.
13. The Application does not provide a forecast of the impact on landmarks of natural significance. The Application is void of discussion of landmarks.

14. The Applicant's Project information contains no mammal studies, and does not discuss such fauna as the Project's effect on foxes, beavers and burrowing animals.

Patrick Lynch

STATE OF SOUTH DAKOTA)

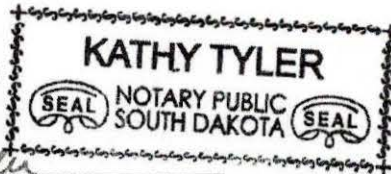
)SS

COUNTY OF Codington)

BE IT KNOWN, that on the 22 day of April 2019, before me, the undersigned officer, personally appeared Patrick Lynch who is to me known to be the person described in and who executed the above and acknowledged the same to be his voluntary act and deed.

IN TESTIMONY WHEREOF, I have hereunto subscribed my name and affixed my official hand and seal, the day, month, and year last above written.

(SEAL)



Kathy Tyler

Notary Public

My Commission Expires: 6/25/21