

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

IN THE MATTER OF THE APPLICATION BY)	MOTION TO AMEND PERMIT
TRIPLE H WIND PROJECT, LLC FOR A)	
PERMIT OF A WIND ENERGY FACILITY IN)	EL19-007
HYDE COUNTY, SOUTH DAKOTA.)	

COMES NOW the Applicant, by and through counsel, and moves the Commission for an Order amending the project boundary as described in the application and permits. Applicant seeks to include the Southwest Quarter of Section 13, Township 111, Range 73 within the project boundary.

In support of its motion, the Applicant states the following:

1. At all times relevant the SW/4 13-111-73 (SW/4) was under easement and participating in the project. The SW/4 is also known to the Project as containing PID 186 and PID 187. The attached confidential figure SD01 Project Overview shows the boundary line as found in the application in bold fluorescent green in the areas of PID 186 and PID 187, and turbines now known as C-01, C-02 and C-05.
2. Sheet 3 of Figure 2-b to the application shows collector lines crossing the red boundary line in the area of Turbine Location 63/64. The project boundary line on the south border of SW/4 was inadvertently drawn one half mile north excluding the SW/4 rather than including it. Other application figures reflect the same inadvertency.
3. As the project layout has been finalized, collection lines from the turbines, and a crane path between them, are projected to cross the SW/4. The crane path is construction activity and thus temporary. The collector lines are buried facilities and thus permanent. The easement on the property permits these activities.
4. Condition 23 of the permit allows for applicant adjustments to access roads, collector system, and other ancillary facilities. SW/4 was surveyed prior to permitting and contains nothing which would conflict with the language of Condition 23.
5. The SW/4 is outside of the project boundary as permitted by the PUC, but within the statutory notice provisions for the filing. The owners of the SW/4 were sent and received notice of these proceedings as required by statute. Because of the way the parcel lies, and because of

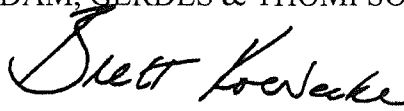
the inclusion of surrounding parcels in the project area, notice of proceedings would not be different. The same persons would have been and were notified.

6. For purposes of project financing, Applicant requests simply that the permit be amended to reflect that this parcel be included within the project boundary for the purposes as stated above. No negative impacts from such an action are anticipated upon anyone.

Dated this 13th day of December 2019.

MAY, ADAM, GERDES & THOMPSON, LLP

BY: _____



Brett Koenecke
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CERTIFICATE OF SERVICE

13th Brett Koenecke of May, Adam, Gerdes & Thompson LLP hereby certifies that on the day of December 2019, he electronically served, a true and correct copy of the foregoing in the above captioned action to the following at his last known address, to-wit:

Ms. Patricia Van Gerpen
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A handwritten signature in black ink, reading "Brett Koenecke". The signature is written in a cursive style with a large, stylized initial "B".

BRETT KOENECKE