

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

**IN THE MATTER OF THE APPLICATION BY SWEETLAND WIND FARM, LLC  
FOR FACILITY PERMITS OF A WIND ENERGY FACILITY AND A 230-KV  
TRANSMISSION FACILITY IN HAND COUNTY, SOUTH DAKOTA FOR THE  
SWEETLAND WIND FARM PROJECT**

**SD PUC DOCKET EL 19-\_\_\_\_\_**

**PRE-FILED DIRECT TESTIMONY OF MARK WENGIERSKI  
ON BEHALF OF SWEETLAND WIND FARM, LLC**

March 6, 2019

1 **I. INTRODUCTION AND QUALIFICATIONS**

2

3 **Q. Please state your name, employer, and business address.**

4 A. My name is Mark Wengierski. I am a Project Manager at Scout Clean Energy. My  
5 business address is 4865 Sterling Drive, Suite 200, Boulder, Colorado 80301.

6

7 **Q. Briefly describe your background and qualifications.**

8 A. I have 12 years of experience in the renewable energy industry. In my current role, I  
9 oversee wind energy assets from inception to construction, which includes permitting  
10 the wind farms at the local, state and federal levels. Prior to joining Scout Clean  
11 Energy, I was the Development Manager for E.ON Climate & Renewables where I  
12 focused on greenfield development (new site selection) for wind energy, which  
13 involved outreach with elected officials, landowners, and other stakeholders, and  
14 coordinating analysis of issues such as airspace constraints, desktop environmental  
15 reviews, transmission accessibility, permitting, zoning and tax review, and impact of  
16 existing land use on potential development. I have experience throughout the  
17 stages of a project's lifespan, from greenfield prospecting to taking an existing  
18 development asset into construction. I have a Bachelor of Science degree in  
19 Biomedical Science and a Master's degree in Land Economics and Real Estate. A  
20 copy of my statement of qualifications is included as **Exhibit A2-1**.

21

22 **Q. Could you explain the relationship between Scout Clean Energy and**  
23 **Sweetland Wind Farm, LLC ("Sweetland" or "Applicant") with respect to the**  
24 **proposed Sweetland Wind Farm and associated Generation Tie-In**  
25 **Transmission Facility (collectively, the "Project")?**

26 A. Sweetland Wind Farm, LLC is a wholly-owned subsidiary of Scout Clean Energy and  
27 Scout Clean Energy is assisting with Project development.

28

29 **Q. Could you please describe Scout Clean Energy’s experience in the renewable**  
30 **energy industry, particularly its experience developing wind projects?**

31 A. Scout Clean Energy is a North American renewable energy development company  
32 focused on utility scale wind development. The Scout Clean Energy team has an  
33 extensive track record developing large scale wind energy projects. Scout Clean  
34 Energy’s project experience includes the Rancho 300-MW project in Crockett  
35 County, Texas (under construction, anticipated Commercial Operations Date of  
36 September 2019) and the Persimmon Creek 200-MW project in Woodward County,  
37 Oklahoma (Commercial Operations Date of August 2018). Prior to forming Scout  
38 Clean Energy, members of the team were integral in the successful development,  
39 marketing, and financing of over 5 gigawatts of utility scale wind facilities across the  
40 United States and Canada.

41  
42 Scout Clean Energy is a portfolio company of Quinbrook Low Carbon Power Fund  
43 LP and Quinbrook Low Carbon Power Parallel Fund (US) LP (collectively, the  
44 “Fund”). The Fund is an infrastructure fund with approximately \$1 billion in capital  
45 raised with investments in the United States, Europe, and Australia. With support  
46 from the Fund, Scout Clean Energy has the experience, skills, personnel, financial  
47 backing, and proven capability to successfully manage wind project development,  
48 construction, and operations and maintenance.

49

50 **Q. What is your role with respect to the Project?**

51 A. I am the Project Manager.

52

## 53 **II. PURPOSE OF TESTIMONY**

54

55 **Q. What is the purpose of your Direct Testimony?**

56 A. The purpose of my testimony is to provide an overview of the Project’s development  
57 history, including: site selection; site analysis; layout and facility design; land use  
58 compatibility; and permitting. I will also provide an overview of Project construction,  
59 operation, and decommissioning.

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**Q. Please identify which sections of the Application to the South Dakota Public Utilities Commission for Facility Permits (“Application”) that you are sponsoring for the record.**

A. I am sponsoring the following sections of the Application:

- Section 1.0: Introduction
- Section 2.0 (excluding Sections 2.2 and 2.5): Project Development Summary
- Section 4.0: Names of Participants
- Section 5.0: Name of Owner and Manager
- Section 6.0: Purpose and Demand for the Facility
- Section 7.0: Estimated Cost of the Project
- Section 8.0: General Site and Project Component Description
- Section 9.0: Alternate Sites and Siting Criteria
- Section 15.2: Public Lands and Facilities
- Section 15.6: Electromagnetic Interference
- Section 16.0: Local Land Use Controls
- Section 19.0: Time Schedule
- Section 20.0 (excluding Section 20.5): Community Impact
- Section 21.0: Employment Estimates
- Section 22.0: Future Additions and Modifications
- Section 23.0: Decommissioning of Wind Energy Facilities
- Section 24.0: Reliability and Safety
- Section 25.0: Information Concerning Wind Energy Facilities
- Section 26.0: Information Concerning Transmission Facilities
- Section 27.1: Permits and Approvals
- Section 27.2: Agency Coordination
- Section 28.0: Testimony and Exhibits
- Appendix A: Figures
- Appendix C: Hand County Documents
- Appendix D: Setback Requirements
- Appendix N: Airspace and Communications Systems

- 91           • Appendix P: Decommissioning Plan

92

93 **III. PROJECT OVERVIEW**

94

95 **Q. Who will own and operate the Project?**

96 A. Sweetland Wind Farm, LLC will construct, own, and operate the Project.

97

98 **Q. Please provide a general description of the Project, including where it is**  
99 **located.**

100 A. The Project consists of an approximately 200-megawatt (“MW”) wind farm and  
101 associated facilities (“Wind Farm”) and an up to approximately 7-mile 230-kilovolt  
102 (“kV”) generation tie-in transmission facility (“Gen-Tie Line”) to be located in Hand  
103 County, South Dakota. The Project components include:

- 104           • Up to 71 primary wind turbine locations and 15 alternate locations;
- 105           • Access roads to each wind turbine;
- 106           • An operations and maintenance (“O&M”) facility;
- 107           • Up to four permanent meteorological towers;
- 108           • Electrical power underground collection lines and communications system;
- 109           • A Project substation;
- 110           • An up to approximately 7-mile-long, 230-kV Gen-Tie Line;
- 111           • A switchyard; and
- 112           • Additional temporary construction areas, including crane paths, pull sites,  
113 access roads, a batch plant, and laydown yard.

114

115 **Q. Has Sweetland secured the necessary private property rights for the Project?**

116 A. Yes. As discussed further in Section VII of my testimony, one couple has not yet  
117 executed an agreement for the Project with respect to their land. However, even  
118 without that land, Sweetland has secured sufficient voluntary Wind Energy Lease  
119 and Easement Agreements (“Wind Leases”) or similar agreements with landowners  
120 for development of the Project.

121

122 **Q. How and where will the Project interconnect to the electric grid?**

123 A. The Project would interconnect to the transmission grid via an approximately 7-mile  
124 long, 230-kV Gen-Tie Line that would carry the electricity from the Project substation  
125 to a switchyard connected to the Western Area Power Administration's ("WAPA")  
126 existing Fort Thompson to Huron 230-kV transmission line, located in Hand County,  
127 South Dakota.

128

129 **Q. Has the Project identified an off-taker for the energy it will produce?**

130 A. No. The Project does not currently have a Power Purchase Agreement or Off-Take  
131 Agreement, but we are currently in discussions with interested parties.

132

133 **Q. What is the proposed development schedule for the Project?**

134 A. Construction is anticipated to begin in the Fourth Quarter of 2019, with the Project  
135 being operational by the Fourth Quarter of 2020. More detailed information  
136 regarding Project milestones are provided in Table 19-1 of the Application.

137

#### 138 **IV. OVERVIEW OF SITE SELECTION**

139

140 **Q. Why did Sweetland initially identify a site in Hand County for development of**  
141 **the Project?**

142 A. The Project site was identified in 2016 after reviewing Clipper Windpower  
143 Development Company's ("Clipper") historic development assets. In 2005, Clipper  
144 began signing wind leases with landowners in Hand County for what was then called  
145 the Rolling Thunder Wind Farm. Clipper's leasing efforts culminated in an  
146 approximately 500,000-acre wind farm area before the formation of a Joint Venture  
147 ("JV") with BP Alternative Energy ("BP"). Upon formation of the JV, the project was  
148 renamed the Titan Wind Farm. BP built the first phase of the Titan Wind Farm in  
149 2009 on approximately 8,000 acres in Hand County, utilizing ten Clipper Liberty wind  
150 turbines, with the power being sold to Northwestern Energy. Due to transmission  
151 constraints, market forces, and economic factors, BP did not construct any additional  
152 phases of the Titan Wind Farm in Hand County. BP subsequently exited the wind

153 farm development business in 2013. With the exception of the leases tied to the  
154 initial phase of the Titan Wind Farm, leases held by Clipper/BP expired.

155  
156 In late 2016, Sweetland met with the U.S. Fish and Wildlife Service (“USFWS”) to  
157 discuss the historical 500,000-acre Titan Wind Farm (a.k.a., Rolling Thunder) site  
158 and to solicit feedback as to where the agency would recommend siting a project  
159 within the site. USFWS suggested a site in the southeasterly area of Hand County  
160 for a number of reasons, including minimizing impacts to USFWS Wetland and  
161 Grassland Easements, siting away from the Missouri River, minimal historic sage  
162 grouse lek locations, low historic avian and bat use, and compatibility with existing  
163 land use (i.e., farming and ranching). The USFWS’s recommendations, along with  
164 strong support from local landowners within the Project Area, wind resource data  
165 demonstrating a quality wind source, ready access to the transmission grid, and  
166 compatibility with existing land use, led Sweetland to identify the current proposed  
167 20,979-acre Project Area in Pearl, Hulbert and Rose Hill Townships in Hand County,  
168 South Dakota.

169  
170 **Q. Please provide an overview of the development work conducted by Sweetland**  
171 **to determine that the site was suitable for wind development.**

172 A. Sweetland has undertaken extensive development activities since 2016, including:  
173 landowner outreach and easement acquisition; local, state, and federal agency and  
174 entity coordination; desktop and field environmental studies and surveys of the  
175 Project Area; and Project design and refinement of the configuration. See Sections  
176 2.0 and 9.1 of the Application for further discussion of these development activities.  
177 In addition, further information regarding the specific environmental studies and  
178 surveys conducted, and Sweetland’s coordination with agencies, is provided in the  
179 Direct Testimony of Todd Mabee, Douglas Shaver, and Carrie Barton.

180

181 **Q. Please discuss in more detail the coordination Sweetland had with local**  
182 **officials and the local community.**

183 A. Sweetland’s outreach efforts have included meeting with individual landowners,  
184 regulatory agencies, local government units, and the general public to discuss the  
185 Project and gather input. Sweetland began meeting with landowners in the fall of  
186 2016 to discuss wind development on their property, and has secured 32 Wind  
187 Leases and four Good Neighbor Agreements for the Project.

188  
189 Additionally, Sweetland presented Project updates to the Board of Hand County  
190 Commissioners at meetings in 2017 and 2018, where the public could ask questions  
191 and voice concerns. As discussed further in the next section, the Project voluntarily  
192 entered into a Development Agreement with Hand County in December 2018.  
193 Overall, the Project has received strong support from the Hand County Commission  
194 and other local stakeholders (for example, local business owners, as well as Hand  
195 County Economic Development).

196  
197 **V. Local Permitting**

198  
199 **Q. Has the Project obtained the land use approvals required for the Project from**  
200 **Hand County?**

201 A. Wind energy facilities (with the exception of the Project substation and switchyard)  
202 are considered a permitted use under Hand County’s Zoning Ordinance (included in  
203 Appendix C of the Application). Therefore, conditional use permits are required only  
204 for the Project substation and switchyard, and Hand County has requested that  
205 those conditional use permits be obtained after the Commission has issued Energy  
206 Facility Permits for the Project. As noted above, Sweetland entered into a  
207 Development Agreement with Hand County, which was approved by the County  
208 Commission on November 8, 2018, and executed December 4, 2018. A copy of the  
209 Development Agreement, which includes commitments regarding setbacks and  
210 sound and shadow flicker levels, is also provided in Appendix C of the Application.

211



212 **Q. Is the Project compatible with existing land uses and future development in**  
213 **and around the Project Area?**

214 A. Yes. The Project is compatible with the existing land uses, which are primarily  
215 agricultural (e.g., crop production, pasture land, hay production). Wind development  
216 is particularly compatible with agricultural land because the existing uses can  
217 continue within the Project Area during construction and operation. As a result, wind  
218 development allows landowners to diversify their operations with minimal disruption  
219 to existing agricultural uses. Further, the Project has been designed to comply with  
220 the Hand County Zoning Ordinance and the Development Agreement, and  
221 Sweetland will obtain all applicable federal, state, and local permits required for the  
222 Project. Sweetland is not aware of any specific development proposed in the vicinity  
223 of the Project, and the Project is not anticipated to interfere with landowners' existing  
224 or planned uses of their land.

225

## 226 **VI. TURBINE MODEL SELECTION**

227

228 **Q. Has the Applicant made a final turbine model selection for the Project?**

229 A. Sweetland is currently considering using the General Electric ("GE") 2.82/127 turbine  
230 model with a rotor diameter of 127 meters (417 feet) and a hub height of either 89 or  
231 114 meters (290 or 374 feet, respectively). GE has indicated it may adjust this  
232 turbine's megawatt output, with all other specifications remaining the same, in which  
233 case Sweetland may use the adjusted megawatt turbine. However,

234

235 While Sweetland currently anticipates using the identified GE turbine model,  
236 Sweetland requests the flexibility to select a different turbine model to ensure the  
237 best turbine technology available can be utilized for the Project. Regardless of the  
238 turbine model selected, the turbine locations would be chosen from the same 86  
239 turbine locations, and the Project layout would comply with applicable County and  
240 State setback, sound, and shadow flicker requirements and commitments.

241

242 **VII. PROJECT CONFIGURATION**

243

244 **Q. Is the Project's proposed configuration depicted in Figure A-2 of the**  
245 **Application?**

246 A. Yes.

247

248 **Q. Please describe the Wind Farm configuration shown in Figure A-2.**

249 A. Figure A-2 shows the proposed layout of the Wind Farm. The configuration consists  
250 of 71 primary wind turbine locations and 15 alternate turbine locations. Figure A-2  
251 also shows the proposed locations of access roads, and underground collection and  
252 communication lines.

253

254 **Q. Please describe the Gen-Tie Line routes, and explain why two routes are**  
255 **proposed.**

256 A. Figure A-2 depicts two route options for the Gen-Tie Line (preferred and alternate)  
257 between the Project substation and the point of interconnection, both of which are  
258 wholly within the proposed Project Area for the wind energy facility. While  
259 Sweetland would prefer to utilize the preferred route, a portion of the route is not  
260 currently under easement, as the landowners would prefer to wait until after energy  
261 facility permits have been issued by the Commission before deciding whether to  
262 participate in the Project. Therefore, Sweetland has identified an alternative route  
263 located on land currently under easement so a fully secured right-of-way option is  
264 available to facilitate interconnection of the Project. The routes are discussed in  
265 more detail in Section 8.3 of the Application.

266

267 **Q. Is the configuration sited so as to minimize potential environmental impacts?**

268 A. Yes. As discussed in the Direct Testimony of Todd Mabee, Douglas Shaver, and  
269 Carrie Barton, and in Sections 10.0 through 14.0, 17.0, and 18.0 of the Application,  
270 through preliminary desktop analysis, site-specific field studies, and ongoing  
271 coordination with agencies, such as the USFWS, South Dakota Game, Fish and  
272 Parks ("SDGFP") and SHPO, Project facilities within the site were located to avoid or

273 minimize potential adverse impacts to wetlands, grasslands, wildlife species of  
 274 concern, and cultural resources, among other resources. For example, no Project  
 275 turbines, access roads, laydown yard, Project substation, switchyard, or  
 276 meteorological towers will be placed on USFWS Wetland or Grassland Easements.  
 277 Further, any Project impacts from the installation of underground collection lines or  
 278 transmission structures on USFWS Grassland Easements will be coordinated with  
 279 and authorized by the USFWS.

280

281 **Q. Please identify the applicable specific setbacks for the Project and other**  
 282 **requirements and commitments that affect turbine setbacks.**

283 A. The applicable setbacks, requirements, and commitments are listed in Table 9-1 of  
 284 the Application and provided below:

285

Category	Requirements/Commitments
<b>State Requirements</b>	
Setbacks	Turbines shall be set back at least 500 feet or 1.1 times the height of the tower, whichever is greater, from any surrounding property line, unless the owner of the wind turbine tower has a written agreement with an adjacent land owner allowing the placement of the tower closer to the property line (SDCL 43-13-24).
<b>Hand County Development Agreement</b>	
Setbacks	Project wind turbines shall be set back 1,320 feet from currently occupied residence, unless waived in writing by the owner of the occupied residence
	Project wind turbines shall be set back from maintained County roadway, unless waived in writing by the County, by 1.1 times the wind turbine tip height
	Project wind turbines shall be set back from maintained township roadway, unless waived in writing by the applicable township, by 1.1 times the wind turbine tip height
	Project wind turbines shall be set back from existing overhead distribution and transmission lines, unless waived in writing by the infrastructure owner, by 1.1 times the wind turbine tip height
	Pursuant to SDCL 43-13-24, Project wind turbines shall be set back from property lines 500 feet or 1.1 times the height of the wind turbine tower, whichever is greater, unless the Developer has a written agreement with the adjacent landowner allowing the placement of the tower closer to the property line, in which case, the tower may be placed closer to the property line shared with that adjacent land owner.
Noise	Sound levels resulting from Project wind turbines will not exceed 50 dBA at

	the currently occupied residences of participating landowners and 45 dBA at the currently occupied residences of non-participating landowners, unless waived in writing by the owner of the occupied residence.
Shadow Flicker	Limit shadow flicker resulting from Project wind turbines at currently occupied residences to 30 hours per year or less, unless waived in writing by the owner of the occupied residence.

286

287 To comply with applicable setbacks, a total of 64 primary and 9 alternate wind  
 288 turbines are proposed to have a hub height of 114 meters, and a total of 7 primary  
 289 and 6 alternate wind turbines are proposed to have a hub height of 89 meters.  
 290 Setback distances are calculated using the maximum potential rotor diameter of 127  
 291 meters (417 feet) and hub heights of 89 or 114 meters (292 or 374 feet). The hub  
 292 height planned for each turbine location, as well as the buildable area for turbines  
 293 after considering the setbacks in the table above, are depicted on the siting  
 294 constraints map provided as Figure A-5 of the Application.

295

296 **VIII. FINAL MICRO-SITING AND FLEXIBILITY**

297

298 **Q. Where is the Project at with respect to micro-siting of the turbines?**

299 A. As discussed previously in my testimony, significant analysis has been completed to  
 300 identify the Project configuration shown in Figure A-2 of the Application. Final micro-  
 301 siting of Project facilities will continue to occur between now and summer 2019,  
 302 based on a Phase I Environmental Site Assessment; remaining wetland and  
 303 waterbodies evaluations, cultural and tribal resource surveys, and a geotechnical  
 304 analysis; and final engineering design.

305

306 **Q. Could remaining work require changes to the turbine locations?**

307 A. Yes. The remaining work could necessitate minor shifts to the proposed turbine  
 308 locations.

309

310 **Q. What is the Applicant's request with respect to flexibility for future minor**  
 311 **shifts in the turbine locations presented in Figure A-2 of the Application?**

312 A. Consistent with prior Commission decisions, Sweetland requests that the permit  
313 allow turbines to be shifted within 250 feet of the turbine locations identified in the  
314 Application without prior Commission approval, as long as the turbine shifts comply  
315 with county and State setback requirements and commitments, and specified noise  
316 and shadow flicker commitments; cultural and tribal resource impacts are avoided or  
317 mitigated in consultation with SHPO; and wetland impacts are avoided. Prior to  
318 implementing the turbine adjustment, the Applicant would file in the docket an  
319 affidavit demonstrating compliance with the limitations set forth above. Any turbine  
320 adjustment that does not comply with the aforementioned limitations would be  
321 considered a “material change,” and the Applicant must file a request for approval of  
322 the “material change” prior to making the adjustment pursuant to the following  
323 approval process outlined in Section 8.2 of the Application.

324

325 **Q. What is the Applicant’s request with respect to flexibility for future minor**  
326 **shifts in the location of the Gen-Tie Line presented in Figure A-2 of the**  
327 **Application?**

328 A. As discussed above, two potential Gen-Tie Line route options are considered  
329 (preferred and alternate). For either of the two route options, Sweetland requests  
330 the ability to adjust structures as long as they remain within the 150-foot-wide right-  
331 of-way identified in the Application, and as long as impacts to cultural resources,  
332 sensitive habitat, and wetlands are avoided. Any adjustments that fall outside of the  
333 150-foot-wide right-of-way identified in the Application, or do not meet the above-  
334 stated limitations, would be considered a “material change.” If there were a “material  
335 change” the Applicant would follow the same process for review of the proposed  
336 “material change” as is outlined above and in Section 8.2 of the Application for  
337 turbine adjustments.

338

339 **Q. With respect to other facilities, what is the Applicant’s request with respect to**  
340 **final micro-siting?**

341 A. As a result of final micro-siting and the utility coordination needed to facilitate Project  
342 interconnection, shifts in the access roads and underground

343 collection/communication systems, as well as changes in the locations of the O&M  
344 facility, meteorological towers, Project substation, switchyard, and laydown yard,  
345 may be necessary. Therefore, the Applicant requests that the permit allow those  
346 facilities to be modified, as needed, so long as the new locations are on land leased  
347 for the Project; cultural and tribal resources are avoided or mitigated in coordination  
348 with SHPO; wetland impacts are avoided; and all other applicable regulations and  
349 requirements are met.

350

## 351 **IX. PROJECT DESIGN AND CONSTRUCTION**

352

### 353 **Q. Please describe the foundations that will be constructed for the turbines.**

354 A. The foundation provides structural support to the assembled turbine. The wind  
355 turbine towers will be connected to a concrete foundation. The permanent turbines  
356 and foundations would each impact a 50-foot radius area. Prior to construction,  
357 geotechnical borings would be performed at all wind turbine locations to develop the  
358 specific design and construction parameters.

359

### 360 **Q. Will the collection system be installed underground?**

361 A. Yes. The underground collection lines would be installed in a trench at least 42  
362 inches below the ground to avoid potential impact from the existing land uses. A  
363 fiber-optic cable and an additional separate ground wire would also be installed with  
364 the underground collection system.

365

### 366 **Q. Could you describe the Project substation?**

367 A. The Project substation would be constructed and operated on a 2-acre, fenced area  
368 and would consist of a substation transformer, circuit breakers, switching devices,  
369 auxiliary equipment, a control enclosure (containing equipment for proper control,  
370 protection, monitoring, and communications), and associated equipment and  
371 facilities. Approval for the Project substation would be subject to Hand County's  
372 Conditional Use Permit process.

373

374 **Q. Please describe the switchyard that will be constructed for the Project.**

375 A. The Project would have a switchyard constructed by WAPA (or constructed by  
376 Sweetland utilizing WAPA specifications in accordance with the Interconnection  
377 Agreement), which would serve as the electrical interconnection between the Project  
378 and the electrical grid. The switchyard would be constructed adjacent to the existing  
379 Fort Thompson to Huron 230-kV transmission line. Approval for the switchyard  
380 would be subject to Hand County's Conditional Use Permit process.

381  
382 **Q. Please describe the O&M facility that will be constructed for the Project.**

383 A. The O&M facility would comprise a single- or two-story building, which would house  
384 operating personnel, offices, operations and communication equipment, parts  
385 storage and maintenance activities, and a vehicle parking area. An area for outdoor  
386 storage of larger equipment and materials would also be included within a fenced  
387 area for safety and security. As discussed further in Section 8.2.3, two potential  
388 O&M facility locations within the Project Area are currently being evaluated.

389  
390 **Q. Please discuss the design and installation of the permanent meteorological  
391 towers.**

392 A. Up to four permanent meteorological towers would be installed as part of the Wind  
393 Farm. These meteorological towers are used to obtain wind data for performance  
394 management once the Wind Farm is operational. The meteorological towers would  
395 be either free-standing or guyed, with heights not to exceed the hub height of the  
396 wind turbines. Sweetland has committed to siting the meteorological towers outside  
397 of USFWS Wetland and Grassland Easements and outside of Above Average  
398 grasslands (as described in Section 13.1 of the Application).

399  
400 **Q. Discuss the Project's access roads and temporary crane paths.**

401 A. The permanent access roads for the Wind Farm would be all-weather, gravel  
402 surfaced, and generally 16 feet in width for the drivable area and additional width for  
403 the shoulder and drainage (if necessary). During construction, some of the access

404 roads would have temporary widths generally not exceeding 50 feet. No permanent  
405 access roads will be required for the Gen-Tie Line.

406  
407 Separate access may be required for the cranes used to erect the wind turbines. In  
408 such cases, temporary 36-foot-wide crane paths would be constructed between  
409 turbine locations. Following completion of construction, the temporary crane paths  
410 would be removed (if required), and the area restored (as needed), in accordance  
411 with industry standards.

412  
413 The final access road design for all 86 turbines (71 primary turbines and 15 alternate  
414 turbines) would be dependent on geotechnical information obtained during the  
415 engineering phase and final turbine placement. For the purposes of the Application,  
416 Sweetland has conservatively assumed an access road network for all 86 turbines of  
417 approximately 24.5 miles of new private roads.

418

419 **Q. Please discuss the design and installation of the Gen-Tie Line.**

420 A. The up to 7-mile long, 230 kV Gen-Tie Line will extend from the Project substation  
421 located in Section 18, Township 111N, Range 66W at the intersection of Vayland  
422 Road (a.k.a., 369th Avenue, or Highway 9) and 205th Street in Hulbert Township, to  
423 the switchyard located in Section 9, Township 110N, Range 66W in Rose Hill  
424 Township. At the switchyard, the power would transfer to the existing Fort  
425 Thompson to Huron 230-kV transmission line, part of the Southwest Power Pool  
426 (“SPP”) transmission line portfolio. Both routes require a permanent easement up to  
427 150 feet wide, plus additional space outside the easement area at angle points for  
428 guys/anchors to secure the Gen-Tie Line. An additional 50 feet of temporary  
429 construction workspace would be needed adjacent to the permanent easement, for a  
430 total temporary construction easement width of 200 feet.

431

432 **Q. What structure design is Sweetland considering for the Gen-Tie Line?**

433 A. The Gen-Tie Line design selected for the Project would be a single circuit  
434 transmission facility constructed on either (1) two-pole wooden H-frame structures,



435 or (2) single steel monopole structures. The selected structure type would depend  
436 on cost due to the current uncertainty of steel prices due to tariffs. Three-pole  
437 structures may be used at angles and dead ends. Both the two-pole wooden H-  
438 frame structures and single steel monopole structures for the Gen-Tie Line would be  
439 directly embedded in the ground. Guy wires would secure turning structures  
440 (angles) and dead-ends for safety. Sweetland would use 795 Aluminum Conductor  
441 Steel Reinforced (“ACSR”) Drake reinforced conductors or conductors of  
442 comparable capacity. Fiber optic cable would run the full length of the Gen-Tie Line  
443 for communications.

444

445 **Q. Discuss the personnel that that will be involved in construction of the Project.**

446 A. During construction, the Project is anticipated to result in up to 200 temporary  
447 construction jobs over 12 months for approximately 400,000 to 420,000 labor-hours  
448 to support Project construction. The construction crews would include skilled labor,  
449 such as foremen, carpenters, iron workers, electricians, millwrights, and heavy  
450 equipment operators, as well as unskilled laborers.

451

452 **X. PROJECT OPERATION AND MAINTENANCE**

453

454 **Q. Discuss the personnel that will be involved in operation and maintenance of**  
455 **the Project.**

456 A. During operation, the Project would employ approximately eight to ten full-time  
457 personnel as facility managers, site managers, and turbine technicians.

458

459 **Q. Discuss the inspections that will be conducted?**

460 A. During operations, the O&M staff would perform scheduled, preventive maintenance  
461 on the turbines, and monitor and address any performance issues. The onsite  
462 operations team also would drive throughout the Project on a regular basis  
463 conducting unrecorded visual inspections of the Project.

464

465 **Q. How will the Project be monitored between inspections?**

466 A. Safety and control mechanisms are included in the Project design. These  
467 mechanisms are generally monitored using a Supervisory Control and Data  
468 Acquisition (“SCADA”) system. Each turbine is connected to the SCADA system via  
469 fiber-optic cable, which allows the turbines to be monitored in real time by the O&M  
470 staff as well as remotely. The fiber-optic cable would be installed in the same trench  
471 as the underground collection lines. The SCADA system also allows the Project to  
472 be remotely monitored, thus increasing Project oversight, as well as the performance  
473 and reliability of the turbines. Not only would the local O&M office have full control of  
474 the wind turbines, but a 24/7 remote operations facility would also have control of the  
475 individual turbines. These two teams coordinate to operate the wind turbines safely  
476 and efficiently. A third mechanism for safety and control is the turbines themselves.  
477 Each turbine monitors the wind speed and direction to ensure its current position is  
478 most efficient to produce electricity. This data is also used for feathering the blades;  
479 applying the brakes in high wind speeds or if there is ice build-up on the blades; and  
480 to tell the turbine when the wind is strong enough to begin turning the generator and  
481 producing electricity at the “cut-in” wind speed.

482

483 **Q. How reliable will the Project be?**

484 A. With respect to a wind energy facility, reliability (or availability) is defined as the  
485 ability of the turbines to generate electricity when sufficient wind is available. GE’s  
486 current turbine availability rate is 98 percent. Additionally, Sweetland requires  
487 availability guarantees from turbine manufacturers and O&M service providers to  
488 maintain the turbine at 98 percent availability or higher. The average annual  
489 availability of transmission infrastructure is very high, in excess of 99 percent.

490

491 **XI. DESIGN, CONSTRUCTION, AND OPERATIONAL CONSIDERATIONS**

492

493 **Q. What safety features will be incorporated into the Project?**

494 A. The Project Area is located in an area of low population density. Construction and  
495 operation of the Wind Farm would have minimal impacts on the security and safety

496 of the local population. The following safety measures would be taken to reduce the  
497 chance of physical and property damage, as well as personal injury, at the site:

- 498 • The wind turbine towers would be sited at distances away from existing  
499 roadways and residences per the applicable planned setback requirements.
- 500 • Security measures would be implemented during the construction and operation  
501 of the Wind Farm, including temporary (safety) and permanent fencing, warning  
502 signs, and locks on equipment and wind power facilities.
- 503 • Access to each tower would be only through a solid steel door that would be  
504 locked and accessed only by authorized personnel.
- 505 • Tower exteriors would be designed to be unclimbable.
- 506 • Turbines would conform to applicable industry standards.
- 507 • A professional engineer would certify that the foundation and tower design of the  
508 turbines is within accepted professional standards, given local soil and climate  
509 conditions.

510  
511 The proposed Gen-Tie Line will be designed in compliance with local, State, and  
512 good utility standards regarding clearance to ground, clearance to utilities, clearance  
513 to buildings, strength of materials, and right-of-way widths. Breakers and relays will  
514 be located where the line connects to the Project substation and would de-energize  
515 the line in the event of an emergency. In addition to protective devices, proper  
516 signage would be posted warning the public of the safety risks associated with the  
517 energized equipment, and vegetation in the easement area will be maintained to  
518 avoid interference with the conductors, allow for ground-based inspections, and  
519 enable access to Gen-Tie Line structures when maintenance is required.

- 520
- 521 **Q. Will the Project participate in the South Dakota One-Call program?**
- 522 A. Yes. The Project will utilize the One-Call program to locate underground  
523 infrastructure prior to construction. In addition, once construction is completed, the  
524 Project will register its facilities with the One-Call program.
- 525

526 **Q. With respect to use of existing local roads as haul roads, will the Applicant**  
527 **coordinate with local road authorities regarding the use and restoration of**  
528 **those roads?**

529 A. Yes. Sweetland plans to enter into a Road Haul Agreement with Hand County and  
530 affected townships governing the use, improvement, repair, crossing with Project  
531 infrastructure, and restoration of roads within the county, as needed. In addition,  
532 Sweetland will obtain from each road authority any road crossing, approach, and/or  
533 utility permits required for the Project.

534

535 **Q. What steps will the Project take to prepare for a potential emergency situation**  
536 **at the Project site during construction and when the Project is operational?**

537 A. During Project construction, the designated contractor would work with local and  
538 county emergency management to develop procedures for response to  
539 emergencies, natural hazards, hazardous materials incidents, manmade problems,  
540 and potential incidents concerning construction. The contractor would provide site  
541 maps, haul routes, construction schedules, contact numbers, training, and other  
542 requested information to local and county emergency management. During  
543 operations, the Project would coordinate with local and county emergency  
544 management to protect the public and the property related to the Wind Farm during  
545 natural, manmade, or other incidents. The Project would register each turbine  
546 location and the O&M facility with the rural identification/addressing (fire number)  
547 system and 911 systems.

548

549 **Q. Has Sweetland analyzed the potential impact of the Project existing**  
550 **communications systems?**

551 A. Yes. Sweetland conducted several studies to document existing communications  
552 systems in the Project Area, including: AM and FM radio report, off-air TV analysis,  
553 microwave point-to-point path analysis, obstruction evaluation and airspace analysis,  
554 and National Telecommunication Information Agency (“NTIA”) notification.

555

556 The Project is not anticipated to interfere with AM and FM radio signals, microwave  
557 paths, or NTIA radio frequencies. Likewise, Sweetland has sited the wind turbines  
558 such that they would not impact any air traffic control, air defense, homeland  
559 security, or weather radar sites.

560

561 There is a potential for scattering of over-the-air television signals in certain areas,  
562 especially those that would have line-of-sight to at least one wind turbine but not to  
563 the television station antenna. However, as discussed in Section 15.6.2.1,  
564 Sweetland is committed to avoiding and/or minimizing impacts to television reception  
565 caused by the Project at existing dwellings and structures.

566

567 **Q. Will the Project be designed, constructed, and operated in compliance with all**  
568 **applicable federal, state, and local regulations?**

569 A. Yes.

570

## 571 **XII. PERMITS AND APPROVALS**

572

573 **Q. In addition to Energy Facility Permits from the Commission and the**  
574 **Conditional Use Permits from Hand County, what other permits or approvals**  
575 **are required for the Project?**

576 A. The permits and approvals needed for the Project are outlined in Table 27-1 of the  
577 Application.

578

579 **Q. Will the Project obtain all local, state, and federal permits and approvals**  
580 **required for the Project?**

581 A. Yes.

582

## 583 **XIII. DECOMMISSIONING**

584

585 **Q. What is the estimated life of the Project?**

586 A. The anticipated life of the Project is approximately 35 years (including a potential  
587 repower and/or retrofit of the turbines and power system with upgrades based on  
588 new technology).

589

590 **Q. Will the Project be decommissioned at the end of its useful life?**

591 A. Once the facilities constructed have reached the end of their useful life, it may be  
592 determined that it is appropriate to retrofit or otherwise upgrade the Project facilities  
593 and continue operations. If retrofitting or upgrading is not done, then the Project will  
594 be decommissioned.

595

596 **Q. If the Project is decommissioned, will the Project comply with all applicable  
597 state and local requirements for structure removal and site restoration?**

598 A. Yes. The Project will be decommissioned in accordance with applicable regulations,  
599 as well as requirements set forth in the Project's Wind Leases.

600

601 **Q. Has the Applicant analyzed the cost of decommissioning the Project?**

602 A. Yes. A decommissioning cost estimate for the Project is included in Appendix P,  
603 and the estimated net decommissioning costs for the Project are summarized in that  
604 document. The decommissioning cost estimate assumed 71 GE 2.82/127 turbines  
605 and either 89-meter or 114-meter hub height. The net decommissioning cost (in  
606 2019 U.S. dollars) is estimated to be \$2.6 million assuming 89-meter hub height and  
607 \$2.9 million assuming 114-meter hub height. The decommissioning cost per wind  
608 turbine is estimated to be \$37,091 assuming 89-meter hub height and \$40,956  
609 assuming 114-meter hub height. These estimates are based on the  
610 decommissioning approach outlined in the decommissioning cost estimate and  
611 assume salvage of wind turbine and transmission facility components.

612

613 **Q. Who will be responsible for covering all anticipated decommissioning costs?**

614 A. Sweetland will be responsible for covering all anticipated decommissioning costs.

615

616 **XIV. PROJECT BENEFITS**

617

618 **Q. Please describe the local and state benefits the Project will provide.**

619 A. As discussed in Section 6.0 of the Application, the electricity generated by the  
620 Project would help meet electricity demand, provide zero-emission cost electricity to  
621 the grid, and provide price stability.

622

623 The Project will also provide a variety of local economic benefits. During  
624 construction, the Project is anticipated to result in approximately 200 temporary  
625 construction jobs over approximately 12 months. During operation, the Project would  
626 employ approximately eight to ten full-time personnel. Construction and operation  
627 are also anticipated to inject millions of dollars into the local economy as the result of  
628 purchase of goods and services.

629

630 Sweetland would pay more than \$35 million in taxes on the Wind Farm over the  
631 anticipated 35-year life of the Project, which would significantly increase the revenue  
632 available for a variety of local needs. A breakdown of the projected tax revenue  
633 distribution is provided in Table 20-5 of the Application.

634

635 Additionally, over the expected 35-year life of the Project, the Project is anticipated  
636 to generate approximately \$21.0 million in Wind Lease payment to Project  
637 landowners, and approximately \$22.5 million in wages paid to approximately 10 full-  
638 time operations and maintenance employees. Thus, the Project is anticipated to  
639 provide significant economic benefits locally, as well as within the State.

640

641 **XV. CONCLUSION**

642

643 **Q. Based on the analysis Sweetland has conducted of the Project Area, has the**  
644 **Project been sited so as to minimize human and land use impacts?**

645 A. Yes. By incorporating the applicable state setback requirement and Hand County  
646 Development Agreement setback, sound, and shadow flicker commitments into

647 Project design, the Project has minimized potential impacts to inhabitants,  
648 resources, and land use in and around the Project. Through implementation of best  
649 management practices and other measures discussed in the Application, the Project  
650 is not anticipated to have any long-term negative impacts on inhabitants or land use  
651 in or around the Project Area.

652

653 **Q. Does this conclude your Direct Testimony?**

654 A. Yes.

655

656 Dated this 6th day of March, 2019.

657



658

659

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660 Mark Wengierski

661 65815139