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## BEFORE THE SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

SOUTH DAKOTA PUBLI UTILITIES COMMISSIO

In the Matter of Revisions to the Energy Facility Siting Rules

DOCKET NO. RM 05-001

COMMENTS OF MISSOURI RIVER ENERGY SERVICES

COMES NOW, Missouri River Energy Services (MRES) and hereby submits the following comments in response to the Order Commencing Rule Making issued in this docket on September 28, 2005.

## I. PROPOSED RULE 20:10:22:33.02(6) SHOULD CLARIFY DISTANCE OF ANTICIPATED ELECTROMAGNETIC INTERFERENCE

Proposed rule 20:10:22:33.02 requires that an applicant for a permit to construct a wind energy facility supply a variety of information, including the anticipated electromagnetic interference (EMI) during the operation of the wind facilities. MRES believes that while this requirement has merit, a limitation on the area from the proposed wind turbine in which to test for EMI would be prudent and would streamline the process.

Assessing EMI and its possible effects on telecommunications is a difficult process involving a wide range of variables. It also can involve calculations over a large geographical area, only to find deminimus interference at best. Therefore, in order to streamline the assessment of EMI for potential wind farm projects, MRES would recommend that the distance for evaluating and calculating possible and/or anticipated EMI be limited to a defined geographical distance from the potential project.

## II. CONCLUSIONS

MRES appreciates the opportunity to file its comments with the board. The submission of these comments does not preclude any MRES members from filing their own comments.

Respectfully submitted,

Missouri River Energy Services November 10, 2005

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Deborah Birgen