

**Response:** Crowned Ridge Wind objects to the data request because it is vague, overly broad, requires speculation on part of Applicant, and not reasonably calculated to lead to the discovery of admissible evidence in this proceeding before the PUC. Therefore, no response is provided.

**Respondent:** Miles Schumacher, Attorney

1-42) Will shadow flicker from the turbines in the CRW project cross a non-participators property line?

1. If yes, provide details of compensation being provided.

**Response:** Crowned Ridge objects to the question because it is vague and calls for speculation. Subject to and without waiving the objections, depending on the proximity of the wind turbine to the non-participator's property line shadow flicker may cross the property line. As modeled, shadow flicker from turbines meets Codington and Grant County ordinances for all participating and non-participating receptors. Compensation is not warranted as there are no exceedances. See Appendix D in the Crowned Ridge Wind Farm Shadow Flicker Study Report for project specific maps showing parcel and property lines.

**Respondent:** Jay Haley, Consultant

Tyler Wilhelm, Project Manager

1-43) Will shadow flicker from the turbines in the CRW project cross a participators property line?

1. If yes, provide details of compensation being provided.

**Response:** Crowned Ridge objects to the question because it is vague and calls for speculation. Subject to and without waiving the objections, depending on the proximity of the wind turbine to the participator's property line shadow flicker may cross the property line. As modeled, shadow flicker from turbines meets Codington and Grant County ordinances for all participating and non-participating receptors. Compensation is not warranted as there are no exceedances. See Appendix D in the Crowned Ridge Wind Farm Shadow Flicker Study Report for project specific maps showing parcel and property lines.

**Respondent:** Jay Haley, Consultant

Tyler Wilhelm, Project Manager

1-44) Will shadow flicker from the turbines in the CRW project cross the CRW footprint boundary line?

**Exhibit D**

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