STATE OF SOUTH DAKOTA	IN CIRCUIT COURT
COUNTY OF CODINGTON	THIRD JUDICIAL DISTRICT

AMBER KAYE CHRISTENSON, ALLEN ROBISH, KRISTI MOGEN, AND PATRICK LYNCH Appellants, vs. CROWNED RIDGE WIND, LLC AND SOUTH DAKOTA PUBLIC UTILITIES COMMISSION Appellees.	Case No. 14CIV19-000290 **COMMISSION STAFF'S RESPONSE BRIEF**

INTRODUCTION

Staff of the South Dakota Public Utilities Commission (Staff) submits this brief in response to the opening brief submitted by Appellants Amber Kaye Christenson, Allen Robish, Kristi Mogen, and Patrick Lynch (together, Appellants). Appellants have appealed the South Dakota Public Utilities Commission's (Commission) issuance of an energy facility permit for the Crowned Ridge Wind Farm and ask the Court to remand for a new contested hearing.

For the purposes of this brief, all citations to the administrative record will be referenced as AR. Citations to the transcript of the evidentiary hearing will be referenced as EH.

STATEMENT OF THE CASE AND FACTS

I. THE COMMISSION'S PROCESS

On January 30, 2019, Crowned Ridge Wind, LLC (Crowned Ridge or Applicant) filed with the Commission an application for a permit to construct an up to 300-megawatt (MW) wind project

(the Project) in Codington and Grant Counties, South Dakota. The Project will consist of up to 130 wind turbines. (AR 20688, Final Decision and Order Granting Permit to Construct Facilities and Notice of Entry (Decision or Permit)).

In South Dakota, an energy facility permit from the Commission is required for wind energy facilities with a capacity of 100 MWs or more. SDCL 49-41B-2(7), (13); SDCL 49-41B-4. Where, as in this case, there are intervening parties and no global settlement is reached, the Commission holds a contested case hearing under SDCL Chapter 1-26. Pursuant to SDCL 49-41B-17, Staff is a party to the proceeding, and therefore, may enter into a settlement with Applicant at any time.

Crowned Ridge submitted its Application for the Project to the Commission on January 30, 2019. With the Application, Crowned Ridge also submitted written testimony for five witnesses, two of whom filed jointly. (AR 965-1023). Pursuant to ARSD 20:10:22:40, the Commission established an intervention deadline of April 1, 2019. The Commission held a public input meeting on March 20, 2019, in Waverly, South Dakota. (AR 1026). Five individuals intervened as parties before the April 1, 2019 deadline, and the Commission granted party status to each intervenor who filed before the intervention deadline. (AR 1070, 1322, 1463). The Commission established a procedural schedule on April 5, 2019. (AR 1463).

On April 9, 2019, Crowned Ridge filed written supplemental testimony[1] for five witnesses, two of whom filed jointly. (AR 1467-1944).

[1] ARSD 20:10:22:39 requires an applicant to file testimony upon the filing of an application. Pursuant to a procedural schedule, other all parties must submit written testimony of any witness they intend to call. Unless upon stipulation, no written testimony is admitted into the record without the witness appearing to testify under oath and be subject to cross-examination at the evidentiary hearing.

On April 25, 2019, Intervenors filed a Motion to Deny and Dismiss requesting that the Commission deny and dismiss the Application. (AR 1957). A hearing on the Motion to Deny and Dismiss was held before the Commission on May 9, 2019. On May 10, 2019, the Commission issued an Order Denying Motion to Deny and Dismiss. (AR 2092).

On May 10, 2019, Appellant Allen Robish submitted written testimony of Allen Robish and an affidavit from Jonathan Thompson. (AR 2096-2097). On May 10, 2019, Commission Staff submitted written direct testimony for four witnesses. (AR 2105-3505). Crowned Ridge submitted written rebuttal testimony for ten witnesses, two of whom filed jointly, on May 24, 2019. (AR 3698-4818).

Appellants submitted a Second Motion to Deny and Dismiss on May 17, 2019. The Second Motion was heard by the Commission on June 6, 2019. The Commission denied the Second Motion. (AR 12245-12252).

The Commission held an evidentiary hearing on June 6, 11, and 12, 2019. (AR 20687). At the hearing, Crowned Ridge and Staff presented witness testimony. (AR 11928-12059, 12253-12504, 12521-1283 (Evid. Hrg. Tr.)). Appellants called no witnesses. The Hearing Examiner presided over the hearing and each of the Commissioners was present for the entirety of the hearing.

On June 13, 2019, Tim and Linda Lindgren, represented by an attorney, filed a Late Application for Party Status. (AR 20101). On June 25, 2019, the Commission heard the late-filed request for party status and voted 2-1 to deny the Lindgrens' request. (AR 20196-20209).

The parties submitted post-hearing briefs on July 2, 2019. (AR 20257 (Appellants), 20445 (Crowned Ridge), 20492 (Staff)). On July 9, 2019, the Commission met to consider whether to issue a facility permit for the Project. ((AR 20565-20652) (Decision Tr.)). At that meeting, the

Commission voted unanimously to issue a permit for the Project, subject to 45 conditions. (*See id*.).

On July 26, 2019, the Commission issued the Permit. (AR 20684). The Permit includes conditions related to various aspects of the Project, including noise and shadow flicker limits, decommissioning requirements, and environmental issues. (*See id.*)

GENERAL LEGAL STANDARD APPLICABLE TO REVIEW OF A COMMISSION DECISION

SDCL 49-41B-30 permits "[a]ny party to a permit issuance proceeding aggrieved by the final decision of the Public Utilities Commission on an application for a permit" to "obtain judicial review of that decision by filing a notice of appeal in circuit court. The review procedures shall be the same as that for contested cases under chapter 1-26 [the Administrative Procedures Act]." SDCL 49-41B-30.[2] Review of the Commission's decision is governed by SDCL 1-26-36, which requires a reviewing court to "give great weight to the findings made and inferences drawn by an agency on questions of fact." SDCL 1-26-36; *see also In re Otter Tail Power Co. ex rel. Big Stone II*, 2008 S.D. 5, ¶ 26, 744 N.W.2d 594, 602 (agency findings of fact reviewed under the clearly erroneous standard). Appellant raised only allegations of abuse of discretion in this appeal.

The Court will only find the Commission abused its discretion, if its findings, conclusions, or decisions are unsupported by substantial evidence and are unreasonable and arbitrary. *In re Midwest Motor Express*, 431 N.W. 2d 160, 162 (1988). SDCL 1-26-1(9) defines substantial evidence as "relevant and competent evidence as a reasonable mind might accept as being sufficiently adequate to support the conclusion." It is long settled that a court will not weigh the

[2] "The sections of Title 15 relating to practice and procedure in the circuit courts shall apply to procedure for taking and conducting appeals under this chapter so far as the same may be consistent and applicable, and unless a different provision is specifically made by this chapter or by the statute allowing such appeal." SDCL 1-26-32.1; *see also* SDCL 15-6-81(c) ("[SDCL ch. 15-6] does not supersede the provisions of statutes relating to appeals to the circuit courts.").

evidence or substitute its judgment for that of the Commission, but, rather, it is the court's function to determine whether there was substantial evidence in support of the Commission's conclusion or finding. *In re Svoboda,* 74 S.D. 444, 447, 54 N.W. 2d 325, 328 (1952); *In re Dakota Transp., Inc.,* 67 S.D. 221, 230, 233, 236, 291 N.W. 589, 593, 595-596 (1940). In addition, the Supreme Court of South Dakota has determined that to be considered an abuse of discretion the agency's action must be "a fundamental error of judgment, a choice outside the range of permissible choices, a decision, which, on full consideration is arbitrary or unreasonable." *Sorensen v. Harbor Bar, LLC*, 2015 S.D. 88, ¶ 20, 871 N.W.2d 851, 856.

Further, a court also only reverses the Commission's decision when it is "left with a definite and firm conviction that a mistake has been committed." *In re Midwest,* 431 N.W. 2d at 162. In addition, even if the Court finds the Commission abused its discretion, the Commission's decision may not be overturned unless the court also concludes that the abuse of discretion had prejudicial effect. *Sorensen*, 2015 S.D. 88, ¶ 20, 871 N.W.2d at 856.

APPELLANTS' REQUEST FOR JUDICIAL NOTICE

Appellants request this Court to take judicial notice of Commission Docket Nos. EL18-003 and EL18-046 (Dakota Range Dockets or Dakota Range Projects). While this Appellee would consider stipulating to judicial notice of the fact that the Commission issued a permit for the Dakota Range I and II Projects in Docket No. EL18-003 and a permit for the Dakota Range III Project in Docket No. EL18-046, it is not proper for judicial notice to be taken of the entire dockets. "Adjudicative facts are those which relate to the immediate parties involved—the who, what, when, where[,] and why as between the parties." *Mendenhall v. Swanson*, 2017 S.D. 2, ⁋ 9, 889 N.W.2d 416, 419, *Quoting, In re Dorsey & Whitney Tr. Co.,* 2001 S.D. 35, ¶ 19, 623 N.W.2d 468,

474 (citations omitted). The Dakota Range Dockets involved different projects, different parties, and different facts than the Crowned Ridge proceeding.

As to the location of the turbines in the Dakota Range Projects, Appellants rely on the concept of geographic facts to support their request. (*See* App. Br. at 5). The Dakota Range Projects are permitted but have not been constructed. There is no precedent allowing for judicial notice of planned man-made structures of which construction has not commenced. This Appellee is unaware of a current planned construction date for any of the Dakota Range Projects.

Appellants argue that the "trial court has the power to take judicial notice." (*See* App. Br. at 9). This Court is not the trial court; it is the appellate court. SDCL 1-26-35 provides that the review "shall be confined to the record." Because the review is limited to the record, no additional evidence may come in, whether through judicial notice or other means.

Judicial notice is not a tool available in the context Appellants request. The request for judicial notice should be denied.

ARGUMENT

Issue 1: The PUC did not abuse its discretion as it considered the information related to sound studies.

The Commission found that "Applicant modelled sound levels with consideration of the cumulative impacts from Dakota Range I and II and Crowned Ridge, II, LLC wind projects." (AR 20697, Finding of Fact 46). Appellants argue that all turbines should have been included in the sound modeling, not just seventeen of the other projects' turbines. Appellants base this argument on a Crowned Ridge witness's testimony that noise from wind turbines can travel twenty to twenty-five miles. (*See* App. Br. at 8).

The Commission's analysis nonetheless went above and beyond what was required by SDCL 49-41B and ARSD 20:10:22. ARSD 20:10:22:13 states that: "[…] The environmental

effects shall be calculated to reveal and assess demonstrated or suspected hazards to the health and welfare of human, plant and animal communities which may be cumulative or synergistic consequences of siting the proposed facility in combination with any operating energy conversion facilities, existing or under construction."

The above rule applies specifically to energy conversion facilities. Wind energy facilities are not energy conversion facilities. *See* SDCL 49-41B-2(6) and (13). The Legislature made this change in 2005 when it amended SDCL 49-41B-1.1 to explicitly separate a wind energy facility from an energy conversion facility by giving wind energy facilities their own definition. *See* SL 2005, ch 250. It must be assumed that the Legislature knew what it was doing and the effects of the legislation when the legislation was passed. "Courts presume that the legislature acted with deliberation, with knowledge of the effect of its act." 82 C.J.S. Statutes § 376.

Therefore, ARSD 20:10:22:13 does not apply to wind energy facilities, and an applicant is not required by law or rule to assess cumulative impacts.

Even if the administrative rule did apply, at the time of the application when the sound modeling was completed, as well as when the Permit was issued, there were no energy conversion facilities or wind energy facilities operating or under construction in the area. Specifically, the Dakota Range projects were not existing or under construction. Because those projects were not existing or under construction, even under the rule the Applicant would not be required to include them in the modeling. Therefore, the sound modeling and the Commission's analysis went above and beyond the scope of review contemplated in the rule by factoring in the closest permitted wind turbines into the noise and shadow flicker analysis.

Crowned Ridge witness Jay Haley's rebuttal testimony states that "[t]he tables in Exhibit 3 of the supplemental testimony show the cumulative results from *all turbines* in CRW, Crowned

Ridge Wind II, and Dakota Range I and II." (*emphasis added*) (AR 4703m Rebuttal Testimony of Jay Haley, 2:11-13). Mr. Haley also stated that "[a]ll wind turbines from both the Crowned Ridge I and Dakota Range wind farms were included in my analysis so any contributions from those turbines at the receptors in the CRW project are represented in the results of the Sound Study." (AR 1478, Supplemental Testimony of Jay Haley, 4:5-8).

It is clear that all turbines were included in the model based on Mr. Haley's testimony. However, the map showed only the nearest ones. The fact that the map showed only the nearest seventeen turbines appears to have led Appellants to the inaccurate conclusion that only seventeen turbines were included in the model.

Throughout their argument regarding Issue I, Appellants criticize Applicant Witness Jay Haley's credentials and use of the initials "P.E." (*See* App. Br. at 7). At the evidentiary hearing, Appellants' trial attorney conducted a lengthy voir dire of Mr. Haley, after which Attorney Ganje objected to the testimony of Mr. Haley on the grounds that the witness held himself out to be a licensed professional engineer because of the initials behind his signature. (EH 344-351). Appellants' trial attorney also submitted a brief upon making an oral objection. (EH 352; AR 12898-12911).

Commission Staff argued that credibility of a witness can be established by training, education, and experience, and licensing is not the end-all determination. (EH 352:15-20). Chairman Hanson stated that he agreed with Commission Staff's argument. (EH 354:10-17). After taking argument from the parties, the Commission unanimously voted to overrule Attorney Ganje's objection. (EH 355:7-9). The Commission's ruling on the admissibility of Mr. Haley's testimony is not an issue that was included within the Statement of Issues and is, therefore, not subject to this Appeal. *See* SDCL 1-26-31.4. Even if this witness's credibility were an issue in

this Appeal, the Commission's determination of credibility would be reviewed under a clearly erroneous standard. *See, Sauder v. Parkview Care Center*, 2007 S.D. 103, ⁋ 11, 740 N.W.2d 878, 882.

This issue arises from an incomplete or inaccurate review of the record. Because the Commission was not actually required by law to do a cumulative impact analysis, and because, in spite of that fact, a cumulative impact analysis for sound was performed, the Commission's Order should be affirmed with respect to this issue.

Issue 2: The PUC did not abuse its discretion in granting an Energy Facility Permit based, in part, on the record evidence regarding sound and shadow flicker.

As a preliminary matter, this issue was not included within the exhaustive list of issues filed by Appellants in the Statement of Issues. Furthermore, this issue was not preserved for appeal. Appellants never objected to the admission of Exhibits A57, A67, or A68. (EH 366, 579:10-12). It is proper for the Court to decline to address it for the first time on appeal. See *Alvine Family Ltd. P'ship v. Hagemann, 2010* S.D. 28, ¶ 21, 780 N.W.2d 507, 514 ("We have consistently held that this Court may not review theories argued for the first time on appeal."). Further, Appellants cite no authority for their position nor was any authority provided at the evidentiary hearing to support the contention that more was required in the sound and shadow flicker studies. Therefore, the issue has been waived. "Failure to cite relevant supporting authority is a violation of SDCL 15-26A-60(6) and is deemed a waiver." *Kostel v. Schwartz*, 2008 S.D. 85, ⁋ 34, 756 N.W.2d 363, 377, (Citing, *State v. Boston*, 2003 SD 71, ¶ 27, 665 N.W.2d 100, 109).[3]

[3] The cited case involves an appeal to the South Dakota Supreme Court, governed by SDCL 15-26A-60. The corresponding statute for an administrative appeal is SDCL 1-26-33.3.

Appellants cite no legal authority for their claim that the Commission was required to rely on sound and shadow flicker studies that included each and every structure. No such requirement exists in South Dakota Law. SDCL 49-41B-22 requires an applicant to establish that

> (1) The proposed facility will comply with all applicable laws and rules;
>
> (2) The facility will not pose a threat of serious injury to the environment nor to the social and economic condition of inhabitants or expected inhabitants in the siting area. An applicant for an electric transmission line, a solar energy facility, or a wind energy facility that holds a conditional use permit from the applicable local units of government is determined not to threaten the social and economic condition of inhabitants or expected inhabitants in the siting area;
>
> (3) The facility will not substantially impair the health, safety or welfare of the inhabitants; and
>
> (4) The facility will not unduly interfere with the orderly development of the region with due consideration having been given the views of governing bodies of affected local units of government. An applicant for an electric transmission line, a solar energy facility, or a wind energy facility that holds a conditional use permit from the applicable local units of government is in compliance with this subdivision.

Nowhere in the statute or the administrative rules is it mandated how an applicant must establish those four elements, whether by Iso-line maps, all-inclusive charts, random samplings, or otherwise. Further, while ARSD 20:10:22:33.02(5) requires an applicant to provide information regarding anticipated operational sound, the rules contain no such requirement for a shadow flicker analysis.

Appellants argue that the ratio of participating versus non-participating landowners would change should each residence in the towns of Waverly and Stockholm be individually counted. (*See* App. Br. at 9). Such a claim is not supported by the record.

Moreover, contrary to Appellants' assertion that the Commission lacked the appropriate information because the residences in the towns of Waverly and Stockholm were not individually depicted in Exhibits A57, A67, and A68, the record does contain a depiction of what the sound and shadow flicker levels would be at those towns. Exhibit A43-1 is a map detailing shadow flicker Iso-lines for the entire project area. (AR 17225-17231). This map demonstrates that each town is well below the shadow flicker limit in the Final Order. Therefore, even if Applicant were to break out the residences individually, the outcome would not change.

Likewise, the record contains information depicting the sound level for the residences in Waverly and Stockholm. Exhibit A43-2 is a map detailing the sound pressure levels Iso-lines for the entire project area. (AR 17232-17238). This exhibit demonstrates that receptors in the towns of Waverly and Stockholm are also well below the sound limit in the Final Order. Even if the receptors in the towns were shown individually in the sound model chart, the outcome would not change.

Even if we assume *arguendo* that the Commission's reliance on the isoline maps provided in the sound and shadow flicker studies in the record was in error, the Appellants cannot demonstrate prejudice. Indeed, Appellants do not even argue they are prejudiced. (*See* App. Br. at 9-10.). Any threat of prejudice is completely eradicated by the fact that the sound and shadow flicker conditions placed on the Permit by the Commission account for actual, not modeled, sound and shadow flicker. (AR 20708- 20710, Condition 26).

Issue 3. The Commission Did Not Abuse Its Discretion When It Approved the Permit Without a Complete Avian Use Study.

Appellants argue that the Commission could not have reasonably issued a decision in this matter, because the avian use survey the Applicant submitted failed to include data from the northeast portion of the project area, the historic Cattle Ridge portion (Cattle Ridge area) of the

project, and that the Commission overlooked this missing information. Appellants' arguments are not supported by the record nor by legal authority.

Appellants cite no legal authority that an application must contain an avian use survey covering the entire project area. SDCL 49-41B-11(11) does require an application for a permit include environmental studies relative to the proposed facility. ARSD 20:10:22:16 does require an Applicant provide information resulting from surveys to identify and quantify terrestrial ecosystems within the siting area however this rule does not specify how an Applicant must meet this burden. While an avian use survey is often used to assess avian species and populations within a project area, it is just one tool that an Applicant can utilize to meet the filing content requirements of SDCL 49-41B-11(11) and ARSD 20:10:22:16. This Appellee is unaware of any other statute or administrative rule which mandates that Applicant must file a complete avian use survey to meet its burden of proof.

The Appellants err in the assessment that the Commission overlooked the fact that the Avian Use Survey Report (Survey) the Applicant filed with its Application failed to include data from the Cattle Ridge area. In fact, the Survey included a map that was clearly marked and clearly identified the portion of the project area the Applicant studied to prepare the Survey. (AR 7271). The scope of the Survey was discussed at length and on numerous occasions before the Commission. During the evidentiary hearing, Ms. Sappington specifically answered questions about the Survey and its scope and contents. (AR 12317-12318). While Ms. Sappington agreed with Appellants' cross-examination questions that the Survey did not include data collected from the Cattle Ridge area, Ms. Sappington also indicated that Applicant did conduct other studies within the Cattle Ridge area and utilized the data collected to prepare Section 11.3 of the Application. (AR 12317-12318). Following the evidentiary hearing, Appellants addressed the

lack of data collection in the Cattle Ridge area in Intervenors' post-hearing brief filed on July 2, 2019. (AR 2265). This matter was again discussed before the Commission at the July 9, 2019 Commission meeting, during which, the Commission heard oral arguments of each party, asked additional questions of the parties and issued its oral decision. (AR 20565-2652). Finally, the Commission specifically acknowledged Appellants' concerns in Finding of Fact V. 31. of the Permit, but found Section 11.3 of the Application identified the Project's potential effects to wildlife for the entire project. (AR 20694). Clearly, the Commission did not overlook Appellants' concerns about the scope of the Survey.

The record also clearly shows that the Commission made a reasonable determination that the Applicant submitted sufficient evidence to meet the environmental information requirements in SDCL 49-41B-11(11) and ARSD 20:10:22:16 and to meet the Applicant's ultimate burden of proof. This evidence is concisely explained in Findings of Fact V. B. 31 and 32 of the Commission's Permit which state:

> 31. lntervenors argue that Crowned Ridge's Application is materially incomplete since the Avian Use Survey did not include the portion of the Crowned Ridge Project Area that was formerly known as Cattle Ridge. Crowned Ridge's expert witness, Ms. Sarah Sappington, testified that while the avian use survey did not include the Cattle Ridge portion of the Project Area, the raptor nest surveys did include that area. Ms. Sappington further testified that Crowned Ridge did study the full extent of the Project Area as detailed in the Application and that shapefiles of the full extent of the Project Area were sent to the SD GF&P. Staff's witness, Mr. Tom Kirschenmann, from the SD GF&P, testified that the survey methods used by Crowned Ridge followed the USFWS guidelines, and were reasonable and appropriate. The Commission finds that the lack of an avian use survey in the Cattle Ridge portion of the Project Area is not fatal to the Application since Section 11.3 of the Application identified the Project's potential effects to wildlife for the entire Project Area, as testified to by Ms. Sappington, and that proper survey methods were used by Crowned Ridge, as testified to by Mr. Kirschenmann. [Footnotes excluded]

> 32. Crowned Ridge will also mitigate temporary impacts to habitat consistent with Mr. Kirschenmann's recommendations. There will be no turbines on game production areas, with the closest two turbines .24 mile and .35 mile away from a game production area. Further, Applicant is required to conduct two years of independently-conducted post-construction avian and bat mortality monitoring for the Project. Applicant committed to file a Wildlife Conservation Strategy, which included both direct and indirect effects as well as the wildlife mitigations measures set forth in the Application, prior to the start of construction. Applicant will file a Bird and Bat Conservation Strategy prior to the start of construction. Also, Mr. Kirschenmann testified that the Applicant had appropriately coordinated with the SD GF&P on the impact of the Project on wildlife. [Footnotes excluded]

(AR 20693-20694, See Also Ex. A1-E; Evid. Hrg. Tr. At 178; Evid. Hrg. Tr. At 180; Ex S3 at 6; Ex. A1; Ex. A42 at 4; S8; Ex. A42 at 10; Permit Conditions ¶ 29; Ex. A42 at 6 and Evid. Hrg. Tr. At 212-213 (June 11, 2019); Permit Conditions ¶ 30; and Ex. S3 at 3-5). As evident in Finding of Fact 31 and 32, the Applicant presented ample environmental and wildlife evidence to supplement any deficiencies in the avian use survey.

Even assuming, *arguendo,* that the Commission erred when it relied on the Survey, Appellants make no argument that they were prejudiced by the Commission's decision to grant the Permit. Additionally, the Commission included a number of conditions on the Permit, applicable to the entire project area, to further ensure that the facility does not adversely affect wildlife in the project area. (AR 20710 and 20714, Conditions 29, 30 and 45). .

Given that there is no specific requirement that an Applicant submit a avian use survey of the entire project area to meet its burden of proof, the Commission's decision to issue a Permit based on the totality of the evidence presented was not an abuse of discretion. The Commission's decision in this matter should be affirmed.

CONCLUSION

The Commission's Decision in this matter is based on an administrative record that consists of more than 21,000 pages. Appellants ask the Court to second-guess the Commission, but Appellants' arguments are not supported by the substantial record in this matter or the law. Additionally, the second issue was not preserved for appeal. Accordingly, Commission Staff respectfully requests that the Court affirm the Commission's Decision.

Dated this 19th day of December 2019.

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