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

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AMBER CHRISTENSON, LINDA LINDGREN AND TIMOTHY LINDGREN v. CROWNED RIDGE WIND LLC AMBER CHRISTENSON'S FIFTH DATA REQUEST TO CROWNED RIDGE WIND, LLC CE22-001

Below, please find Complainant Amber Christenson's Fifth Data Request to Crowned Ridge Wind, LLC. Please submit responses within 20-days. Please provide the author/responsive party to each answer/response. Amber Christenson reserves the right to ask additional and follow up questions. You are required to consider this data request ongoing and please be certain to update your responses as information becomes available.

- 5-1) Mr. Martinsen provides testimony stating he has been employed by NEER since 2004 in various capacities. His current role is specified on the unmarked exhibit provided by him as part of his testimony is a 'Wind General Manager." Please provide the dates of Mr. Martinsen's capacity as a Wind General Manager.
- 5-2) Mr. Martinsen provides testimony stating he has been employed by NEER since 2004 in various capacities. Please provide the dates of Mr. Martinsen's capacity as Regional Wind Site Manager.
- 5-3) Please provide the duties Mr. Martinsen provided NEER while Regional Wind Site Manager.
- 5-4) How many times has Mr. Martinsen physically visited the Crowned Ridge Wind facility and project area?
- 5-5) When specifically did Mr. Martinsen physically visit the Crowned Ridge Wind facility and project area?
- 5-6) When Mr. Martinsen visited the Crowned Ridge Wind facility and project area, what was his position with the company?
- 5-7) What, if anything, has Mr. Martinsen done to ensure the compliance of the permitted noise level of the project at issue in Codington County and/or Grant County as part of his position insofar as 'ensuring the safe and reliable operations of NEER's wind fleet'?
- 5-8) Regarding Mr. Martinsen's answer on page 3 of his testimony regarding the shutdown of Turbine 71: What was the cause of the turbine fault which caused the turbine to be offline November 12 and 13, 2021?
- 5-9) Was maintenance performed on Turbine 71 on November 12 and/or November 13, 2021? If so, what maintenance was performed to restore the turbine to online status?

- 5-10) On page 3, lines 23 and 24 of Mr. Martinsen's testimony, Mr. Martinsen states, 'At no time did Crowned Ridge intentionally shut down a wind turbine with the intent of improving or impacting the results of the 2021 sound study.' Please describe the reason and effect from any and all intentional shut down time periods for any turbine(s) in the Crowned Ridge project area during what was to have been the same Fall 2021 sound study (as compared to the 2020 sound study).
- 5-11) Did Mr. Martinsen oversee and review an identical in areas covered, conditions and any and all of the same turbine shut downs in the 2020 sound study testing? If so, please list and detail each and every specific action or reaction taking place within the sound study areas.
- 5-12) Other than Mr. Martinsen and MISO, who in the NEER Company or Crowned Ridge Wind has the authority or capability to shut down turbine(s)?
- 5-13) Did anyone other than Mr. Martinsen or MISO manually shut down a turbine during the fall 2021 sound study? If so, who and why was such shut down undertaken?
- 5-14) Mr. Lampeter asserts in his testimony, page 1, lines 26 and 27, that he has provided acoustical consulting on over 80 wind energy projects. Regarding any of those wind projects, was Mr. Lampeter hired by anyone other than the representative wind company or government agency to perform any such sound study(s)?
- 5-15) Has Mr. Lampeter ever found acoustical non-compliance in a sound study of a wind farm? If so, specifically where and specifically when?
- 5-16) On page 4, lines 11-12, Mr. Lampeter states that in the 2020 sound study, equipment was placed 85 feet from the 'residential structure' at location 2. If the homeowner did not agree to the protocols of the sound study, why was the alternate location for Location 2 not used?
- 5-17) To Mr. Lampeter: Do ANSI guidelines provide any authorization, suggestion or recommendation for a so-called "averaging" of noise at 10 minute intervals to be considered accurate and reliable for precise sound study review and analysis?
- 5-18) To Mr. Lampeter: Is Epsilon equipment insured against damage during a sound study?
- 5-19) How many sound studies has Mr. Lampeter provided in his years during the months of January and February? Please provide dates and locations, if any.
- 5-20) To Mr. Lampeter: On Crowned Ridge Wind's unmarked exhibit, your curriculum vitae, you list 28 renewable energy projects in which you conducted/participated in noise impact assessments. 16 of those projects list NextEra/FPL as your client, (3 sound studies would be attributed to Crowned Ridge Wind, and 1 testimony for Crowned Ridge 2, which would make 20 of 28 assessments for NextEra/FPL), in any of these or other projects you claim to participate in noise assessment,
  - 1) Did any of these projects, other than Crowned Ridge Wind (also known as Crowned Ridge 1), utilize WIOM software during your assessment/study?

- 2) Did any of these projects, other than Crowned Ridge Wind (also known as Crowned Ridge 1), utilize WIOM software after your assessment/study to remedy a noise issue?
- 5-21) To Mr. Lampeter: Do you agree that personal observations combined with contemporaneous notes are more advantageous and reliable as compared to incomplete and flawed recorded observations in and a part of attempted sound studies?
- 5-22) To Mr. Lampter: Please provide all of your knowledge and interaction with WIOM software and especially provide any data, information, correspondence, research, training, and any communication you and/or your company possess with regard to WIOM software.

Dated this 30<sup>th</sup> day of August, 2023.

<u>/s/Amber Christenson</u> Amber Christenson 16217 466<sup>th</sup> Ave Strandburg, SD 57265 605-467-3535