

- 1-3) Please provide the maintenance log entries for Turbine 38 for the years 2020, 2021 and 2022.

Original Response: Crowned Ridge objects to Data Request 1-3, as it requests information that is not limited in time and not relevant to the 2021 sound study performed by Epsilon Associates, Inc. ("Epsilon"). Crowned Ridge also objects because the request seeks confidential information which if publicly disclosed would result in competitive harm to Crowned Ridge and NextEra Energy Resources, LLC ("NEER") wind generation affiliates of Crowned Ridge. More specifically, the disclosure of Crowned Ridge's maintenance log would provide competitors with information on how Crowned Ridge and other NEER wind project affiliates plan and execute maintenance of its wind turbines and the performance of the wind turbines. Maintenance plans and generator performance were developed at considerable cost, effort, and time to Crowned Ridge and the NEER wind generator affiliates, with the understanding that the information would be protected from competitors. Consequently, to publicly disclose Crowned Ridge's maintenance logs would be detrimental because it would provide competitors information valuable to them in making their own competitive decisions, without the competitors expending the time and money necessary to gather and develop the information. Subject to and without waiving these objections, Crowned Ridge responds: after the Commission issues an appropriate protective order and after Complainant has executed an appropriate non-disclosure agreement, Crowned Ridge will provide Confidential Information Attachment 1 to DR 1-3 which includes the maintenance log entries for Turbine 38 for the years 2020, 2021 and 2022. Concurrently with the submission of this response, Crowned Ridge is filing a motion for the issuance of a protective order in this proceeding.

Supplemental Response: Crowned Ridge objects to Data Request 1-3, as it requests information that is not limited in time and not relevant to the 2021 sound study performed by Epsilon Associates, Inc. ("Epsilon"). Subject to and without waiving this objection, Crowned Ridge responds: See Attachment 1 to Data Request 1-3.