

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE )  
APPLICATION BY CROCKER WIND )  
FARM, LLC FOR A PERMIT OF A )  
WIND ENERGY FACILITY AND A 345 )  
KV TRANSMISSION LINE IN CLARK )  
COUNTY, SOUTH DAKOTA, FOR )  
CROCKER WIND FARM )

EL 17-028

**DIRECT TESTIMONY OF**

**BARRY FLADEBOE**

**ON BEHALF OF**

**CROCKER WIND FARM, LLC**

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1 **Q. Please state your name and business address for the record.**

2 A. Barry Fladeboe, 7650 Edinborough Way, Suite 725, Edina, MN 55435

3 **Q. Can you briefly describe your education and experience?**

4 A. I have a Bachelor of Arts from the University of St. Thomas in St. Paul, Minnesota. I am  
5 the Director of Wind Development at Geronimo Energy in Edina, Minnesota. I am responsible  
6 for managing Geronimo's wind development effort and staff. Prior to Geronimo Energy, I  
7 worked for approximately 11 years in wind and solar development industries, working for  
8 Gamesa Energy, Invenergy LLC, and Capital Power.

9 **Q. Have you attached a resume or CV.**

10 A. Yes.

11 **Q. Have you previously submitted or prepared testimony in this proceeding in South**  
12 **Dakota?**

13 A. No.

14 **Q. What is the purpose of your direct testimony?**

15 A. To provide testimony on the Crocker Wind Farm application.

16 **Q. Which sections of the application are you responsible for?**

17 A. I assisted in the preparation of Section 16.0 Local Land Use Controls; Section 19.2, Sale  
18 of Power; Section 19.5 Construction Financing; Section 19.6 Permanent Financing; and  
19 Section 19.7 Expected Commercial Operation Date.

20 **Q. Did you work with the county agencies in the conditional use permit process**

21 A. Yes. I worked closely with the county board and ZBA.

22 **Q. Is the current CUP compatible with project goals?**

23 A. No. The current CUP includes rules that are drastically different then the rules in Clark

24 County Wind Ordinance. The current CUP limits the project's access to the highest wind speed  
25 sites within the project area, and creates engineering and siting issues throughout the project. The  
26 current CUP, which includes a "setback" distance of  $\frac{3}{4}$  a mile, is nearly 4 times the "minimum  
27 setback" in the ordinance. The reduction in power production and increase in engineering costs  
28 places a significant cost burden on the project. The setback in the CUP is larger than any  
29 operating project in the Midwest faces. We have significant concerns about Crocker competing  
30 in the market under the currently granted CUP. Geronimo developed and planned this project for  
31 over 9 years, making significant investments into Clark County based on the Clark County Wind  
32 Ordinance.

33 **Q. What efforts did you try to make to bridge the gap?**

34 A. Geronimo representatives made significant efforts to bridge the gap. Geronimo did pre-  
35 permit application meetings with many of the wind farm opposition members as directed by the  
36 board. Geronimo proactively doubled the setback in the Wind Ordinance and removed 8 turbine  
37 sites of concern by opposition landowners at the board's request to address the concerns.  
38 Geronimo offered to work under a setback twice what is included in the ordinance. Additionally,  
39 as directed by the County Board, Geronimo offered to make payments to the opposition  
40 landowners.

41 **Q. Describe the information provided in Section 19.2 – Sale of Power**

42 A. The Applicant continues to actively market electricity to third parties, including  
43 independently owned utilities, municipalities, cooperatives, and commercial and industrial  
44 customers. The sale of electricity may take the form of a power purchase agreement, a financial  
45 off-take solution, or the sale of the Project to a utility. The sale will drive the timelines for many  
46 of the major commitments such as equipment procurement and construction contracting.

47 **Q. Describe the information provided in Section 19.5 – Construction Financing**

48 A. The Applicant will be responsible for financing all pre-development, development, and  
49 construction activities. The Applicant has financed all development activities through internal  
50 funds, and will continue to do so. Construction will be financed through a combination of  
51 internal funds and third-party sources of debt and equity capital.

52 **Q. Describe the information presented in 19.6 - Permanent Financing.**

53 A. Permanent financing will be provided with the Applicant's internal funds, and third-party  
54 sources of debt and equity capital.

55 **Q. Describe the information presented in 19.7 – Commercial Operation Date**

56 A. The Applicant anticipates that the project will be begin commercial operations in the  
57 fourth quarter of 2019. The commercial operation date is dependent on the completion of the  
58 permitting process and the successful sale of power.

59 **Q. Does this conclude your written pre-filed direct testimony?**

60 A. Yes.

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64 Dated this 27th day of September, 2017.



65 Barry Fladeboe  
66  
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