

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)

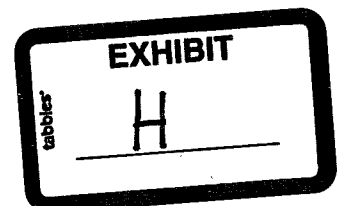
EL 17-028

DIRECT TESTIMONY OF

BARRY FLADEBOE

ON BEHALF OF

CROCKER WIND FARM, LLC



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 ¾ 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.