

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

---

**IN THE MATTER OF THE  
APPLICATION BY DAKOTA RANGE  
I, LLC AND DAKOTA RANGE II, LLC  
FOR A PERMIT OF A WIND ENERGY  
FACILITY IN GRANT COUNTY AND  
CODINGTON COUNTY, SOUTH  
DAKOTA, FOR THE DAKOTA RANGE  
WIND PROJECT**

---

\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*

**APPLICANTS' RESPONSES TO  
INTERVENOR KRISTI MOGEN'S  
DATA REQUESTS**

**EL18-003**

Below, please find Applicants' responses to Intervenor Kristi Mogen's Data Requests.

**1-1) Every siting map of the Dakota Range I & II from the beginning concept to the final PUC permit application map.**

Mollie Smith: Applicants object to this request as overly broad. In addition, this request seeks information that is confidential and/or trade secret.

**1-2) Owner's manual for a 136' 4.2 MW Vesta Turbine.**

Mark Mauersberger: This information is not available to the Applicants, and manuals like this are typically designated as confidential and/or trade secret by the turbine manufacturer.

**1-3) Safety manual for a 136' 4.2 MW Vesta Turbine.**

Mark Mauersberger: This information is not available to the Applicants, and manuals like this are typically designated as confidential and/or trade secret by the turbine manufacturer.

**1-4) Operators manual for a 136' 4.2 MW Vesta Turbine.**

Mark Mauersberger: This information is not available to the Applicants, and manuals like this are typically designated as confidential and/or trade secret by the turbine manufacturer.

**1-5) Repair manual for a 136' 4.2 MW Vesta Turbine.**

Mark Mauersberger: This information is not available to the Applicants, and manuals like this are typically designated as confidential and/or trade secret by the turbine manufacturer.

**1-6) Kind of oil used in a 136' 4.2 MW Vesta Turbine.**

Mark Mauersberger: This information is not available to the Applicants.

**1-7) Amount of oil used in a 136' 4.2 MW Vesta Turbine.**

Neil James (Director Site Operations) and Nikhil Kondabala (Senior Manager Energy Analytics): The hydraulic system uses approximately five gallons; the gearbox uses approximately 330 gallons.

**1-8) Point of source noise level.**

Robert O'Neal: The hub height (82 meters above ground level).

**1-9) Concrete requirements for a 136' 4.2 MW Vesta Turbine.**

Tracy Butler (Director of Civil Engineering): Approximately 571 cubic yards of 5,000 and 6,000 psi concrete.

**1-10) Rebar requirements for a 136' 4.2 MW Vesta Turbine.**

Tracy Butler (Director of Civil Engineering): Approximately 42 tons of steel reinforcing.

**1-11) Completed, approved CUP from Grant County.**

Brenna Gunderson: Copies of the Applicants' Grant County Conditional Use Permits are provided in Appendix K of the PUC Application.

**1-12) Completed, approved CUP from Codington County.**

Brenna Gunderson: Copies of the Applicants' Codington County Conditional Use Permits are provided in Appendix K of the PUC Application.

**1-13) All documents filed with Grant County.**

Brenna Gunderson: Applicants are providing the Grant County Conditional Use Permit Application via an external datasite.

**1-14) Provide the date and by who the seismographing was completed.**

Jennifer Bell: Information regarding the risk of seismic activity in the vicinity of the Project Area was obtained from the U.S. Geological Society ("USGS") Earthquake Hazards Program (USGS, 2017a and USGS, 2017b), the 2014 USGS National Seismic Hazard Map (USGS, 2017a), and the South Dakota Geological Society ("SDGS") (SDGS, 2013). *See* Section 12.1.1.4 of the PUC Application, and the resources cited therein, for further details.

**1-15) Provide seismographing locations and findings.**

Jennifer Bell: Please see the response to DR 1-14.

Dated this 1st day of June, 2018.

By /s/ Mollie M. Smith  
Mollie M. Smith  
Lisa A. Agrimonti  
FREDRIKSON & BYRON, P.A.  
Attorneys for Applicants  
200 South Sixth Street, Suite 4000  
Minneapolis, MN 55402  
Phone: (612) 492-7270  
Fax: (612) 492-7077