Exhibit A15

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE APPLICATION OF DAKOTA RANGE I, LLC AND DAKOTA RANGE II, LLC FOR AN ENERGY FACILITY PERMIT TO CONSTRUCT A WIND ENERGY FACILITY

SD PUC DOCKET EL-18-003

PREFILED REBUTTAL TESTIMONY OF BRENNA GUNDERSON ON BEHALF OF DAKOTA RANGE I, LLC AND DAKOTA RANGE II, LLC

May 21, 2018

I. INTRODUCTION

Q. Please state your name and place of employment.

A. My name is Brenna Gunderson. I am the Director of Project Development for Apex Clean Energy, Inc.

Q. Please describe your background and qualifications.

A. I have been a wind energy developer for eleven years, six of which I have worked for Apex Clean Energy. I am currently the Director of Project Development. Prior to working for Apex Clean Energy I was a Project Manager of wind development with EDP Renewables. I have a Master of Arts degree in Counseling and Psychological Services from St. Mary's University, Minneapolis, MN. A copy of my statement of qualifications is included as **Exhibit 1**.

Q. Did you provide Direct Testimony in this Docket on January 24, 2018?

A. No.

Q. What is the purpose of your Rebuttal Testimony?

A. The purpose of my Rebuttal Testimony is to respond to certain portions of the testimony of Jon Thurber, submitted on behalf of the South Dakota Public Utilities Commission Staff ("Staff").

Q. Are there any exhibits attached to your Rebuttal Testimony?

A. The following exhibits are attached to my Rebuttal Testimony:

- **Exhibit 1**: Statement of Qualifications.
- **Exhibit 2**: Turbine Flexibility Proposal

II. RESPONSE TO TESTIMONY OF JON THURBER

Q. Mr. Thurber discusses the Applicant's request for turbine flexibility. What is Dakota Range requesting?

A. Dakota Range is requesting that the permit allow turbines to be shifted within 500 feet of their current proposed location, so long as specified noise and shadow flicker thresholds are not exceeded, cultural resource impacts are avoided or minimized per the Cultural Resources Monitoring and Management Plan, environmental setbacks are adhered to as agreed upon with the U.S. Fish and Wildlife Service ("FWS") and South Dakota Game, Fish and Parks ("GFP"), and wetland impacts are avoided to the extent practicable. If turbine shifts are greater than 500 feet, exceed the noted thresholds, or do not meet the other limitations specified, Dakota Range would either use an alternate turbine location or obtain Commission approval of the proposed turbine shift.

Q. Mr. Thurber references Staff Data Request 7-5 and notes that the Applicant responded that this information is not readily available. What was requested in Staff Data Request 7-5?

A. Staff Data Request 7-5 asked the Applicant to: "

- "[P]rovide a list of all wind generation projects completed by Apex Clean Energy Holding, LLC, or an associated subsidiary, where turbines were moved during the final micrositing process."
- "[P]rovide how many turbines were moved, how many feet each turbine was shifted, and the reason for each shift."
- "[P]rovide a list of all wind generation projects completed by Apex Clean Energy Holding, LLC, or an associated subsidiary, where no turbines were shifted during the final micrositing process."

Q. Why did Dakota Range respond that the information sought by Staff in Data Request 7-5 is not readily available?

A. Dakota Range responded that the information sought in Data Request 7-5 was not readily available because the request was quite broad and sought detailed and specific information related to multiple projects involving a large number of wind turbines. Apex Clean Energy Holdings, LLC ("Apex") and its subsidiaries have been involved in the development and construction of more than 2,200 MW of wind

energy in the last nine years. Because it is not uncommon for turbine shifts to occur during final micrositing, for the reasons I will discuss in more detail below and as identified in the Application, it simply was not possible to identify each and every turbine shift, and the reasons for that shift, in response to the data request.

Q. Why is Dakota Range requesting the flexibility to shift turbines 500 feet?

A. As discussed in Section 9.1 of the Application, "[a]s a result of final micrositing, minor shifts in the turbine locations may be necessary to avoid newly identified cultural resources (cultural resource studies in coordination with the SWO are ongoing), or due to geotechnical evaluations of the wind turbine locations, landowner input, or other factors." I will discuss each of these factors in more detail below:

- Tribal Resources: Dakota Range completed tribal resource surveys with Sisseton Wahpeton Oyate ("SWO") tribe in May 2018. As a result of those surveys, and input from the tribe, Dakota Range has identified certain wind facilities it wants to shift in order to avoid areas of cultural significance to the tribes. There are five turbines Dakota Range would need to shift between 100 and 500 feet to address SWO's concerns.
- Geotechnical Evaluations: Geotechnical soil borings will be completed at each turbine location prior to the start of construction and are used to design each turbine's foundation. Should the geotechnical evaluation indicate soil composition at currently proposed locations is not adequate to support a turbine's foundation design, an engineer will first attempt to shift the turbine's location to an area with better soil before redesigning the foundation. The requested flexibility will better enable Dakota Range to utilize the geotechnical data in turbine placement and foundation design.
- Landowner Input: It is common for a landowner to put more thought into the location of the turbine over time. This is particularly true as construction activities get closer or even commence. We do our best to address the concerns of our landowners and try to accommodate their reasonable requests, and having the ability to shift a turbine without further approval will better enable us to do so.

- Other Factors: There may be unknown obstacles underground that are not discovered until excavation activities begin. Should an obstacle such, as a boulder or a previously unidentified cultural resource, be discovered during construction, shifting the turbine may allow the obstacle to be avoided without delaying construction activities. Additionally, if a new microwave tower was installed prior to commencement of construction, and a turbine location obstructed the tower's beam path, shifting the turbine may resolve the issue.

Q. On pages 7-8 of his testimony, Mr. Thurber sets forth a process for handling turbine shifts that occur. Do you have comments on this proposed process?

A. Yes. Rather than the process Mr. Thurber has outlined, Dakota Range proposes the turbine flexibility discussed above, along with a review/approval process for "material changes," i.e., those turbine adjustments that do not meet the turbine flexibility limitations outlined above. The requested turbine flexibility, and the material change review/approval process, are outlined on the attached **Exhibit 2.**

Dakota Range's proposal would allow the flexibility to shift turbines within 500 feet of the currently proposed locations without further approval, subject to the limitations outlined in Exhibit 3. Dakota Range would file an affidavit demonstrating compliance with the applicable requirements prior to implementing the shift.

For those adjustments that exceed 500 feet or do not otherwise comply with the specified limitations, Dakota Range proposes submitting a filing containing the information outlined in Exhibit 3, and providing Staff with ten calendar days within which to determine if the proposed adjustment should be referred to the Commission for further review. If further review is not requested, Dakota Range could proceed with the turbine adjustment. If further review is requested, the Commission would make a determination on the adjustment at its next regularly scheduled meeting after the Staff's referral is made.

During construction, keeping schedules is crucial not only to meeting the commercial operation date, but also to managing contracts with contractors and subcontractors. Dakota Range believes its proposal will ensure compliance with all applicable setbacks, commitments, and requirements, while also enabling the Project to remain on-schedule and on-budget.

Q. Have you reviewed the requests for location deviations referenced by Mr. Thurber on page 8 of his testimony?

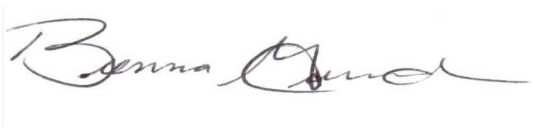
A. Yes. It is important to note that in past wind project dockets, the project developers had substantial micrositing flexibility, as they did not have to identify final turbine locations until 30 days prior to construction. In this case, Dakota Range is only asking for 500 feet of turbine flexibility, limited by the commitments set forth above. Therefore, when compared to past wind project dockets, the requested turbine siting flexibility is minimal.

III. CONCLUSION

Q. Does this conclude your Rebuttal Testimony?

A. Yes.

Dated this 21st day of May, 2018.



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Brenna Gunderson