

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

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**IN THE MATTER OF THE  
APPLICATION BY PREVAILING  
WIND PARK, LLC FOR A PERMIT OF  
A WIND ENERGY FACILITY IN BON  
HOMME COUNTY, CHARLES MIX  
COUNTY AND HUTCHINSON  
COUNTY, SOUTH DAKOTA, FOR  
THE PREVAILING WIND PARK  
PROJECT**

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**APPLICANT'S RESPONSES TO  
STAFF'S SIXTH SET OF DATA  
REQUESTS  
EL 18-026**

Below, please find Applicant's Responses to Staff's Sixth Set of Data Requests to Applicant.

- 6-1) Refer to the Application, Page 15-14. Please provide all studies and supporting documentation that show a shadow flicker requirement of less than 30 minutes per day or 30 hours per year will avoid a significant adverse impact on neighboring land uses and a significant adverse impact on health.**

Peter Pawlowski: Based on the studies and documentation addressed in testimony by Prevailing Wind Park, a shadow flicker requirement of less than 30 minutes per day or 30 hours per year is not necessary to avoid adverse impacts on land use or health. See, e.g., the testimony submitted by Aaron Anderson and Dr. Mark Roberts. In addition, the Project will comply with all applicable shadow flicker requirements and commitments.

- 6-2) Refer to the Applicant's Disclosure of Lay Witnesses, which identifies Karen Peters and Dustin Brandt as participating landowners that will testify at the hearing. For each individual testifying, please provide the following information:**

- a) How many acres of land does the landowner have in the project?**

Bridget Canty: Prevailing Wind Park has a lease with Larry Peters and Karen Peters Living Trust, Larry Peters, Trustee, and Karen Peters, Trustee, Husband and Wife, with respect to 260 acres. Prevailing Wind Park has a lease with Dustin Brandt and Elizabeth Brandt with respect to 60 acres.

- b) Provide a map which identifies each landowners' leased land within the project area, including where the turbines, if any, are sited on their land.**

Bridget Canty: See attachment 6-2b.

- c) Provide a map that shows the proposed turbines within 2 miles from their residence. Please provide a map similar to Page 88 of 156 of Staff Exhibit\_JT-1**

in Docket EL18-003 for Ms. Teresa Kaaz  
(<http://puc.sd.gov/commission/dockets/electric/2018/EL18-003/exhibits/staff/s1.pdf>).

Bridget Canty: See Attachment 6-2c.

**d) Provide the predicted sound level from the Project at their residence.**

Chris Howell:

Receptor	Sound Power Level
REC-016 (Peters)	38.9 dBA
REC-051 (Brandt)	32.7 dBA

**e) Provide the estimated annual frequency of shadow flicker associated with the operation of the Project wind turbines at their residence.**

Aaron Anderson:

Receptor	Flicker, Hours	Flicker, Minutes
REC-016 (Peters)	4.78 hours / year	27 minutes/day
REC-051 (Brandt)	4.90 hours / year	26 minutes/day

**6-3) Please provide a study, with calculations included, signed by a professional engineer that demonstrates ice throw will not occur beyond 620 feet.**

Lisa Agrimonti: Prevailing Wind Park does not possess such a study. In lieu thereof, see the Rebuttal Testimony of Scott Creech.

Dated this 5th day of October, 2018.

By: /s/ Lisa M. Agrimonti

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### Turbine Distance to Residence

Turbine	Length Miles	Length Feet
T57	0.5	2658
T16	0.75	3948
T48	0.77	4050
T40	0.78	4106
T32	0.78	4138
T22	0.93	4909
T23	1.05	5556
T15	1.13	5969
T8	1.49	7869
T26	1.61	8513
T9	1.7	8955





Turbine Distance to Residence

Turbine	Length Miles	Length Feet
T38	0.64	3364
T43	1.28	6738
T14	1.63	8590
T44	1.67	8795

Residence

Proposed Turbine

Distance Lines

2 Mile Buffer

Parcels

Project Area

NORTH

0

0.5

1

Miles



**Residence & Property of**  
**Dustin A. Brandt**  
**30049 407th Avenue**  
**Bon Homme County**  
**South Dakota**