

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

**IN THE MATTER OF THE APPLICATION BY DEUEL HARVEST WIND ENERGY LLC
FOR ENERGY FACILITY PERMITS OF A WIND ENERGY FACILITY AND A
345-KV TRANSMISSION LINE IN DEUEL COUNTY, SOUTH DAKOTA FOR THE
DEUEL HARVEST NORTH WIND FARM**

SD PUC DOCKET EL18-053

**PRE-FILED REBUTTAL TESTIMONY OF JOANNE BLANK
ON BEHALF OF DEUEL HARVEST WIND ENERGY LLC**

April 1, 2019

1 **I. INTRODUCTION**

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3 **Q. Please state your name.**

4 A. My name is JoAnne Blank.

5

6 **Q. Have you previously provided testimony in this docket?**

7 A. Yes. I provided Direct Testimony on November 30, 2018 and Supplemental
8 Testimony on February 14, 2019.

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10 **II. PURPOSE OF TESTIMONY**

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12 **Q. What is the purpose of your Rebuttal Testimony?**

13 A. The purpose of my Rebuttal Testimony is to provide an updated shadow flicker
14 analysis to reflect shadow flicker modeling at the two new residences (receptors)
15 under construction in the Project Area, as described in Michael Svedeman's
16 Rebuttal Testimony.

17

18 **Q. What exhibits are attached to your Rebuttal Testimony?**

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

- 20 • Exhibit 1: Updated Shadow Flicker Analysis

21

22 **III. SHADOW FLICKER ANALYSIS UPDATE**

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24 **Q. Please describe the updates reflected in the updated shadow flicker analysis.**

25 A. The updated analysis evaluates shadow flicker at 233 potential receptors. This
26 includes the original 231 potential receptors and the two new residences (receptors)
27 under construction in the Project Area. The updated analysis also reflects removal
28 of turbine locations Nos. 34 and 19, A74, A75 and A76.

29

30 **Q. What are the results of your analysis?**

31 A. Of the 233 potential receptors analyzed, none is expected to receive more than 30
32 hours of shadow flicker annually.

33

34 **Q. Based on the results of the updated shadow flicker analysis, will the Project**
35 **comply with the Deuel County shadow flicker limit?**

36 A. Yes. The Project is not projected to result in shadow flicker levels above 30 hours
37 per year at any residential inhabited building. Therefore, the Project will comply with
38 the Deuel County Zoning Ordinance.

39

40 **IV. CONCLUSION**

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42 **Q. Does this conclude your Rebuttal Testimony?**

43 A. Yes.

44

45 Dated this 1st day of April, 2019.

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48 JoAnne Blank

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