

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

**IN THE MATTER OF THE
APPLICATION OF DEUEL HARVEST
WIND ENERGY LLC FOR A PERMIT
OF A WIND ENERGY FACILITY AND
A 345-KV TRANSMISSION LINE IN
DEUEL COUNTY**

* **APPLICANT’S UPDATED RESPONSE**
* **TO STAFF’S DATA REQUEST 2-6**
* **EL18-053**
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Below, please find Applicant’s responses to Staff’s Data Request 2-6 to Applicant.

2-6) Referring to section 15.6.5 of the Application, please file the IRAC determination once received.

Michael Svedeman: Deuel Harvest will file the IRAC determination once received. The IRAC determination has been delayed as a result of the agencies involved being impacted by the government shutdown.

Updated Response (Michael Svedeman): The National Telecommunications and Information Administration issued its response letter on February 13, 2019, and concluded that there were no concerns regarding radio frequency blockage. A copy of this letter is attached as Attachment 2-6(A). However, the Department of Energy submitted comments asking that Deuel Harvest contact the Western Spectrum Manager at Western Area Power Administration (“WAPA”) to coordinate turbine placement. WAPA owns a 345 kV transmission line in the Project area.

On February 21, 2019, Deuel Harvest engineers reached out to WAPA to address any concerns regarding turbine placement in relationship to the line. All turbine locations are setback 1.1 times the tip height of the turbine from the WAPA 345 kV transmission line (approximately 550 feet). On the same day, WAPA responded, stating, “As long as the coordinate information in the attached letter has not changed, these facilities will not be impacted. If any changes in turbine locations have occurred since the notification letter, then WAPA will require the updated information to reexamine potential for impact. Turbines of interest since they are closest to our radio path would be #87, #88, and #89. Turbines #93 through #98 are also close and do not pose a problem unless there was significant movement.” Also on the same day, Deuel Harvest responded to WAPA and

indicated that it would not move or shift any of the turbines identified by WAPA without coordinating with WAPA. WAPA responded, noting that there is no requirement for Deuel Harvest to respond to NTIA regarding the coordination. A copy of this correspondence is attached as Attachment 2-6(B).

Dated this 28th day of February 2019.

By */s/ Lisa Agrimonti* _____

Mollie M. Smith

Lisa M. Agrimonti

FREDRIKSON & BYRON, P.A.

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UNITED STATES DEPARTMENT OF COMMERCE
National Telecommunications and
Information Administration
Washington, D.C. 20230

February 13, 2019

Mr. Steven Gordon
Project Engineer
INVENERGY LLC
One South Wacker Drive, Suite 1800
Chicago, IL 60606

Re: Deuel Harvest Project: Deuel County, SD

Dear Mr. Gordon:

In response to your request on November 20, 2018, the National Telecommunications and Information Administration provided to the federal agencies represented in the Interdepartment Radio Advisory Committee (IRAC) the plans for the Deuel Harvest Wind Energy Center, located in Deuel County, South Dakota.

After a 45+ day period of review, one agency, Department of Energy, had objections to turbine construction in the designated area(s). DOE comments are noted here in this letter.

This project has the potential to adversely affect Western Area Power Administration operations. Energy requests the developer *coordinate turbine placement directly* with our Western Spectrum Manager:

Scott E. Johnson, Sr. Telecom Engineer; U.S. Dept. of Energy, Western Area Power Admin. Hdqtrs; P.O. Box 281213, Lakewood CO 80228; sjohnson@wapa.gov.

While the IRAC agencies did not identify any concerns regarding radio frequency blockage, this does not eliminate the need for the wind energy facilities to meet any other requirements specified by law related to these agencies. For example, this review by the IRAC does not eliminate any need that may exist to coordinate with the Federal Aviation Administration concerning flight obstruction.

Thank you for the opportunity to review these proposals.

Sincerely,

John R. McFall
Deputy Chief, Spectrum Services Division
Office of Spectrum Management

Waller Pitts, Haley

From: Johnson, Scott <SJohnson@WAPA.GOV>
Sent: Thursday, February 21, 2019 3:06 PM
To: Gordon, Steven
Cc: Svedeman, Michael
Subject: RE: [EXTERNAL] Deuel Harvest, SD - NTIA Response

Steven,

The letter received from NTIA was to inform you of the need to coordinate with the impacted agency, but there is no requirement to respond to NTIA regarding that coordination. NTIA leaves it up to the agency and the developer to resolve any potential problems to the satisfaction of both. If you are ever asked to produce documentation of that, these emails would serve the purpose. I will maintain copies of our email correspondence as well for WAPA's records.

Regards,

Scott E. Johnson | Sr. Telecommunications Engineer | Spectrum Management

Western Area Power Administration | Headquarters | Lakewood, CO

Department of Energy

(O) 720.962.7380 | (F) 720.962.4080 | sjohnson@wapa.gov



From: Gordon, Steven [<mailto:SGordon@invenergyllc.com>]
Sent: Thursday, February 21, 2019 12:13 PM
To: Johnson, Scott <SJohnson@WAPA.GOV>
Cc: Svedeman, Michael <MSvedeman@invenergyllc.com>
Subject: RE: [EXTERNAL] Deuel Harvest, SD - NTIA Response

Scott,

Thank you for getting back to me, I appreciate the quick response. The turbine locations we submitted are permitted and not planned to change so that's great to hear that there is no impact. We will notify you of any turbine moves in the future, though we do not anticipate that being the case.

Is there anything else we need to do to notify NTIA that the issues have been resolved? Please let me know if there is anything I can do to assist there.

I appreciate your help.

Thanks,

Steven Gordon | Staff Engineer, Renewable Engineering
sgordon@invenergyllc.com | D 312-429-2512

From: Johnson, Scott [<mailto:SJohnson@WAPA.GOV>]
Sent: Thursday, February 21, 2019 10:32 AM

To: Gordon, Steven <SGordon@invenergyllc.com>
Cc: Svedeman, Michael <MSvedeman@invenergyllc.com>
Subject: RE: [EXTERNAL] Deuel Harvest, SD - NTIA Response

Steven,

Thanks you for contacting me regarding the Deuel Harvest wind project. WAPA was provided the attached notification letter containing the turbine locations for this project. These turbines were plotted in our GIS to determine location with respect to our existing microwave radio communications systems and determine potential for interference with those systems. After plotting these turbines, they fell between our Bemis radio site and Blair substation . As long as the coordinate information in the attached letter has not changed, these facilities will not be impacted. If any changes in turbine locations have occurred since the notification letter, then WAPA will require the updated information to reexamine potential for impact. Turbines of interest since they are closest to our radio path would be #87, #88, and #89. Turbines #93 through #98 are also close and do not pose a problem unless there was significant movement. Let me know if this will be required.

Thanks,

Scott E. Johnson | Sr. Telecommunications Engineer | Spectrum Management

Western Area Power Administration | Headquarters | Lakewood, CO

Department of Energy

(O) 720.962.7380 | (F) 720.962.4080 | sjohnson@wapa.gov



From: Gordon, Steven [<mailto:SGordon@invenergyllc.com>]
Sent: Thursday, February 21, 2019 7:50 AM
To: Johnson, Scott <SJohnson@WAPA.GOV>
Cc: Svedeman, Michael <MSvedeman@invenergyllc.com>
Subject: [EXTERNAL] Deuel Harvest, SD - NTIA Response

Hello Mr. Johnson,

My name is Steven Gordon and I am an engineer for Invenergy, a renewable energy company. I am reaching out on behalf of one of our wind projects, Deuel Harvest, in Deuel County SD. We received response from the NTIA mentioning the DoE may have concerns regarding the nearby WAPA operations and that we should reach out to you for further discussions. I have attached the letter here for reference. Please let me know how best to proceed here and if there is any more information you need from me at this time.

I look forward to hearing back.

Thank you,
Steven

Steven Gordon | Staff Engineer, Renewable Engineering
Invenergy | One South Wacker Drive, Suite 1800, Chicago, IL 60606
sgordon@invenergyllc.com | D 312-429-2512

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

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

CERTIFICATE OF SERVICE

EL18-053

Mary Ann S. Monahan, of Fredrikson & Byron, P.A., hereby certifies that on the 28th day of February, 2019, true and correct copies of the Deuel Harvest Wind Energy LLC's Updated Response to Staff's Data Request 2-6 and this Certificate of Service were served electronically on the Parties listed below:

Ms. Amanda Reiss
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500 E. Capitol Ave.
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 /s/ Mary Ann S. Monahan
Mary Ann S. Monahan