

**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 SECOND SET OF DATA**  
\* **REQUESTS TO CHRISTINA KILBY**  
\*  
\* **EL18-053**  
\*  
\*  
\*

Below, please find Deuel Harvest Wind Energy LLC’s (“Applicant”) Second Set of Data Requests to Christina Kilby. Please submit responses within 10 business days or promptly contact the undersigned to discuss an alternative arrangement.

- 2-1) On page 2 of your direct testimony, you state that, “[i]f people want to bring development into the area, wind turbines are not the way to do it.” With respect to this testimony: (a) Identify the other economic development opportunities available in Deuel County you believe would be preferable; (b) Identify economic development opportunities in which you have been personally involved concerning the Deuel County economy.
  
- 2-2) Identify your education, training, and experience with respect to real estate valuation, and provide any supporting documentation.
  
- 2-3) Identify your education, training, and experience with respect to the practice of medicine, and provide any supporting documentation.
  
- 2-4) On page 4 of your direct testimony, you state that, “I believe there is sufficient evidence for concern regarding the negative impacts to people from living in close proximity to turbines.” Identify the distance of your residence from the Project Area.
  
- 2-5) Are you intending to provide expert testimony in this proceeding?

- 2-6) Identify your education, training, and experience with respect to acoustics and/or audiology, and provide any supporting documentation.
  
- 2-7) On page 7 of your direct testimony, you state that “[t]here are many articles and studies I feel are extremely relevant to ensuring the project(sic) is sited as safely as possible but I am unable to submit them at this time due to time constraints.” With respect to this statement:
  - a. Identify and provide the articles and studies referenced in your testimony.
  
  - b. Identify and describe your education, training, and experience with respect to the subject matter of those articles and studies.
  
- 2-8) Identify other places in South Dakota that you believe are more fit for wind energy development than Deuel County that might fit the same criteria as identified in Section 9.1 of the Application.
  
- 2-9) Identify the landowners from whose properties you want turbines to be removed.
  
- 2-10) Confirm that your primary residence is in Burnsville, Minnesota.
  
- 2-11) Confirm that your primary residence is also your place of business.
  
- 2-12) What is your occupation?
  
- 2-13) Is your occupation dependent on your place of residence?

Dated this 27th day of March 2019.

By */s/ Lisa Agrimonti* \_\_\_\_\_

Mollie M. Smith

Lisa M. Agrimonti

FREDRIKSON & BYRON, P.A.

Attorneys for Applicant

200 South Sixth Street, Suite 4000

Minneapolis, MN 55402

Phone: (612) 492-7000

Fax: (612) 492-7077

66303869.1