

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

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**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**

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

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\* **CHRISTINA KILBY’S RESPONSES TO**  
\* **APPLICANT’S SECOND SET OF DATA**  
\* **REQUESTS**  
\* **EL18-053**  
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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.

- a) **Deuel County could market the area as a peaceful rural and recreational area. Marketing could include recreational activities at the lakes and hunting. Deuel County could try to bring people to the area who are leaving their communities because of wind projects. The Project has already caused people who previously contributed to the Deuel county economy and tax base to move out of the area. (The Holborn and Collins families, as well as others.)**
- b) **My parents have contributed to the development of Deuel County through the construction of a building, a home, dams, and other conservation efforts that included hiring individuals locally and purchasing materials. When my family and I spend time at our family property, we contribute to the economy of Deuel County by making purchases of food and gas in Clear Lake or Gary. If the reason for our travel to Deuel County- the peace, tranquility and beautiful scenery- are destroyed, we will not spend as much time or money in Deuel County.**

2-2) Identify your education, training, and experience with respect to real estate valuation, and provide any supporting documentation.

**None.**

2-3) Identify your education, training, and experience with respect to the practice of medicine, and provide any supporting documentation.

**None.**

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.

**I do not live in the area as Invenergy is aware. However, my parents are building a home near the project area, and I am concerned for whomever would live there, as well as anywhere else near the turbines.**

2-5) Are you intending to provide expert testimony in this proceeding?

**No.**

2-6) Identify your education, training, and experience with respect to acoustics and/or audiology, and provide any supporting documentation.

**None.**

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.

**There is an abundance of information available including news stories, personal accounts, lawsuits, case studies, scientific studies, reviews etc. that have led me to believe that wind turbines severely negatively affect some people. What I have learned was corroborated by what I heard during the testimony of Vicki May during the Prevailing Winds evidentiary hearing. I believe she suffers significantly because of the turbines near her home. She had not been opposed to the project near her home prior to it beginning operation. So it was likely not a “nocebo” effect. I will not discount her suffering. A person does not need special training to be able to make an intelligent informed opinion. Likewise, just because someone has special training does not mean that everything they say is truthful or accurate.**

b. Identify and describe your education, training, and experience with respect to the subject matter of those articles and studies.

**I object to this question as irrelevant.**

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.

**West of the river where you can drive for miles and miles without seeing any residences or buildings, or even animals. I think that would be the ideal place *if* the concern is protecting the safety and welfare of people and animals.**

2-9) Identify the landowners from whose properties you want turbines to be removed.

**I really do not care who owns the property. I want turbines moved that will pose a threat of serious injury to anyone using the Homan runway. I know there are people who want turbines, or more turbines on their property. The turbines could be moved to prevent the threat of serious injury. This would show that Invenergy and Deuel Harvest care about the communities they transform. The runway is permitted. John Homan did not give up his right to the safe use of his permitted runway.**

2-10) Confirm that your primary residence is in Burnsville, Minnesota.

**Yes.**

2-11) Confirm that your primary residence is also your place of business.

**I object to this question as irrelevant.**

2-12) What is your occupation?

**I object to this question as it is irrelevant. Subject to and without waiving that objection, Invenergy is already aware that I am attorney.**

2-13) Is your occupation dependent on your place of residence?

**I object to this question as irrelevant. Subject to and without waiving that object, no my occupation is not “dependent on [my] place of residence.”**

Dated: April 13, 2019

/S/ Christina Kilby  
Christina Kilby  
Intervenor  
112 Geneva Blvd.  
Burnsville, MN 55306  
952-913-6771