

April 12, 2019

VIA ELECTRONIC FILING

Ms. Patricia Van Gerpen
Executive Secretary
South Dakota Public Utilities Commission
500 E Capitol Ave
Pierre, SD 57501-5070

**RE: 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 Project
Docket EL18-053**

Dear Ms. Van Gerpen:

In connection with the above-referenced matter, enclosed please find a Certificate of Service, Deuel Harvest Wind Energy LLC's ("Deuel Harvest" or "Applicant") Witness List and Exhibit List, and marked copies of the following hearing exhibits:

- Exhibit A26: Updated Land Ownership Map
- Exhibit A27: GE Safety Manual (**Attorney's Eyes Only**)
- Exhibit A28: GE Operating Manual (**Attorney's Eyes Only**)
- Exhibit A29: Applicant Updated Response to Commission Staff's Data Request 2-6
- Exhibit A30-1: Applicant Responses to Intervenor John Homan's First Set of Data Requests
- Exhibit A30-2: Applicant Responses to Intervenor John Homan's Second Set of Data Requests
- Exhibit A30-3: Applicant Supplemental Responses to Intervenor Christina Kilby's First Set of Data Requests
- Exhibit A30-4: Applicant Responses to Intervenor Christina Kilby's Second Set of Data Requests
- Exhibit A31-1: Applicant's First Set of Discovery Requests to Intervenor John Homan and Intervenor John Homan's Responses
- Exhibit A31-2: Applicant's Second and Third Sets of Discovery Requests

Attorneys & Advisors
main 612.492.7000
fax 612.492.7077
fredlaw.com

Fredrikson & Byron, P.A.
200 South Sixth Street, Suite 4000
Minneapolis, Minnesota
55402-1425

- to Intervenor John Homan and Intervenor John Homan's Responses
- Exhibit A31-3: Applicant's Second Set of Discovery Requests to Intervenor Christina Kilby and Intervenor Christina Kilby's Responses (if received)
- Exhibit A31-4: Applicant's Third Set of Discovery Requests to Intervenor Christina Kilby and Intervenor Christina Kilby's Responses (if received)
- Exhibit A31-5: Applicant's First Set of Discovery Requests to Intervenor Heath Stone and Intervenor Heath Stone's Responses
- Exhibit A31-6: Applicant's Second and Third Sets of Discovery Requests to Intervenor Garrett Homan and Intervenor Garrett Homan's Responses

Exhibits A27 and A28 are being submitted as Attorney's Eyes only confidential trade secret information. Exhibits A27 and A28 contain propriety trade secret information belonging to General Electric Company ("GE"). The information contained in these exhibits would provide an advantage to a competitor if known. Invenergy and Deuel Harvest, on behalf of themselves and GE, request that the document be maintained confidential in perpetuity. Questions regarding this confidentiality request can be directed to the undersigned, Lisa Agrimonti. Confidentiality is requested for this trade secret information pursuant to SDCL Section 1-27-1.5 and ARSD 20:10:01:39 – 20:10:01:45. The factual basis that qualifies the information for confidentiality is that the information is proprietary, is subject to a non-disclosure agreement between Invenergy and GE and is being provided with permission by GE only if it remains Attorney's Eyes only confidential trade secret, with the exception that it may be viewed by the Commission and Commission Staff.

Copies of Exhibit A27 and Exhibit A28 are being provided only to the Commission and the Commission Staff, subject to the above paragraph.

Please note that Deuel Harvest has previously filed the exhibits marked A1 through A25, as described on the enclosed Witness List and Exhibit List. Exhibit A1 is the Application, filed on November 30, 2018; Exhibits A8 through A13-1 (Deuel Harvest's supplemental testimony and exhibits) were filed on February 14, 2019; Exhibits A14 through A23 were filed on April 1, 2019 (Deuel Harvest's rebuttal testimony and exhibits); and Exhibits A2 through A7-2 (Deuel Harvest's direct testimony and exhibits) and A24 through A25 (Deuel Harvest's surrebuttal testimony and exhibits) were filed April 11, 2019.

Ms. Patricia Van Gerpen
April 12, 2019
Page 3

If you have any questions, please let me know.

Sincerely,

/s/ Lisa Agrimonti

Lisa Agrimonti
Attorney at Law

Direct Dial: 612.492.7344

Email: lagrimonti@fredlaw.com

Enclosures

cc: Service List

66480545.2