

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

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**IN THE MATTER OF THE APPLICATION  
BY PREVAILING WIND PARK, LLC FOR  
A PERMIT OF A WIND ENERGY  
FACILITY IN BON HOMME COUNTY,  
CHARLES MIX COUNTY AND  
HUTCHINSON COUNTY, SOUTH  
DAKOTA, FOR THE PREVAILING  
WIND PARK PROJECT**

**INTERVENORS' FIRST  
AMENDED  
DISCLOSURE OF  
LAY WITNESSES**

**EL 18-026**

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Intervenors, Gregg Hubner, Marsha Hubner, Paul Schoenfelder, and Lisa Schoenfelder

("Intervenors"), through their counsel, hereby submit this First Amended Disclosure of Lay

Witnesses:

1. Vickie May  
88737 500<sup>th</sup> Avenue  
Lynch, Nebraska 68746  
402-569-2130

Vickie May is expected to testify about her experiences living 1 3/8 miles from the nearest of 200 turbines in a wind farm located in Holt County, Nebraska (Grand Prairie Wind, developed by Geronimo). In particular, she will testify about symptoms she began experiencing after the project became operational (e.g., sleep deprivation, ringing of ears, ear pain, anxiety) and how her quality of life has decreased.

2. Scott Rueter  
905 Lakeside Avenue  
Lake Park, Iowa 51347  
712-260-6678

Scott Rueter is expected to testify about his experience living 900 feet from a turbine in a wind farm located in Iowa. He can testify about symptoms he experienced after the project became operational and how he was forced to move from his home. He has also witnessed the malfunctioning of a turbine, during which the turbine caught fire and the blades became separated from the tower and fell to the ground.

3. Lori Fuerniss  
40263 293<sup>rd</sup> Street  
Delmont, South Dakota 57330

Lori Fuerniss is expected to testify about her experience living a little over a mile from the closest turbine in the Beethoven Wind Farm. There are five turbines within 2 miles of her residence.

Since the Beethoven Wind Farm went operational, she has experienced the following: trouble falling asleep; difficulty staying asleep for more than 4 hours; headaches; and stress. These issues have had a detrimental impact on her quality of life and her relationships.

4. Sherm Fuerniss  
40263 293<sup>rd</sup> Street  
Delmont, South Dakota 57330

Sherm Fuerniss is expected to testify about his experience living a little over a mile from the closest turbine in the Beethoven Wind Farm. There are five turbines within 2 miles of his residence.

Since the Beethoven Wind Farm went operational, he has experienced the following: trouble falling asleep; difficulty staying asleep for more than 4 hours; waking with clenched jaw, shoulders hunched, and head off of the pillow; vertigo; wooziness; and anxiety. These issues have had a detrimental impact on his quality of life, including causing him to be short tempered and short with family members.

Sherm Feurness is also expected to testify regarding his involvement in the zoning process in Charles Mix County, including what he observed during public hearings and communications with county officials.

Moreover, Sherm Feurness is an intervenor in this proceeding.

5. Richard Daugherty  
29499 Leola River Road  
Pollock, South Dakota 57648-6105  
605-889-2336

Rich Daugherty is expected to testify about his experience living near the Campbell County Wind Farm, including the shadow flicker and noise caused the turbines.

6. Josh Larson  
29554 113<sup>th</sup> Street  
Pollock, South Dakota 57648  
605-230-0372

Josh Larson is expected to testify about his experiences living 1,400 feet from a wind turbine in the Campbell County Wind Farm, including the noise he deals with inside his home.

7. Jerome Powers  
40427 294<sup>th</sup> Street  
Wagner, South Dakota 57380  
605-491-1161

Jerome Powers is expected to testify about his experience living near the Beethoven Wind Farm. There are seven turbines within 2 miles of his residence.

Since the Beethoven Wind Farm went operational, he has experienced the following: headaches; constant ear ringing; loss of sleep; agitation; and difficulty concentrating.

He is also expected to testify about his observations with ice building up on turbines and ice throws. He has seen ice shards approximately 1,000 feet from a turbine and 600 feet from another turbine.

He also has a pheasant hunting business (Dakota Plains Hunting – 40427 294<sup>th</sup> Street, Wagner, SD 57380) that is located in and around the proposed Prevailing Wind Park. He anticipates he will lose \$15,000 to \$20,000 per year if the Project is built as planned. He spoke with 50 regular clients; 25 said they will not come back if this project is built.

He is also expected to testify regarding his involvement in the zoning process in Charles Mix County, including what he observed during public hearings and communications with county officials.

8. Kelli Pazour  
29668 402<sup>nd</sup> Avenue  
Wagner, South Dakota 57380

Kelly Pazour is expected to testify about her daughter that wears a BAHA (Bone anchored hearing aid) and the concerns she has regarding Prevailing Wind Park.

9. Karen Jenkins  
28912 410<sup>th</sup> Avenue  
Tripp, South Dakota 57376

Karen Jenkins is expected to testify about her experience living near Beethoven Wind Farm and her experiences with the County Commissioners in all three counties of Bon Homme, Charles Mix and Hutchinson.

Karen Jenkins is also an intervenor in this proceeding.

10. Travis Krumvieda  
37658 238<sup>th</sup> St.  
Wessington Springs, South Dakota 57382  
605-770-5529

Travis Krumvieda is expected to testify about his experience as a participating landowner in a wind project, including the noise created by the project.

11. Gregg Hubner  
29976 406<sup>th</sup> Avenue  
Avon, South Dakota 57315

Gregg Hubner is expected to testify about his experience with the Bon Homme County Commissioners and Zoning Board about zoning.

12. Paul Schoenfelder  
40228 296<sup>th</sup> Street  
Wagner, South Dakota 57380

Paul Schoenfelder is expected to testify about his experience with Charles Mix County's zoning efforts.

13. Keith Mushitz  
37024 289<sup>th</sup> Street  
Geddes, South Dakota 57342

Keith Mushitz is expected to testify about Charles Mix County's zoning related to wind energy systems and specifically the Project.

14. Michael Soukup  
29630 416<sup>th</sup> Ave.  
Scotland, South Dakota 57059

Michael Soukup is expected to testify about Bon Homme County's zoning related to wind energy systems and specifically the Project.

15. Brian McGinnis  
PO Box 687  
Yankton, South Dakota 57078

Brian McGinnis is expected to testify about his involvement with zoning issues related to the Project and with the pertinent counties' adoption of zoning regulations or controls.

16. Kevin Andersh  
40128 294<sup>th</sup> Street  
Wagner, South Dakota 57380

Kevin Andersh is expected to testify about his experience living close to the Beethoven Wind Farm and a registered cemetery on his property (Section 15-96-62, Charles Mix County).

17. Hutchinson County Representative  
140 Euclid Street  
Olivet, South Dakota 57052

A Hutchinson County representative may be called to testify about Hutchinson County's zoning related to wind energy systems and specifically the Project.

Dated this 19th day of September, 2018.

DAVENPORT, EVANS, HURWITZ &  
SMITH, L.L.P.



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Reece M. Almond  
206 West 14<sup>th</sup> Street  
P.O. Box 1030  
Sioux Falls, SD 57101-1030  
Telephone: (605) 336-2880  
Facsimile: (605) 335-3639  
E-mail: [r almond@dehs.com](mailto:r almond@dehs.com)  
*Attorneys for Intervenors Gregg Hubner,  
Marsha Hubner, Paul Schoenfelder and  
Lisa Schoenfelder*