

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

**IN THE MATTER OF THE
APPLICATION OF FLYING COW
WIND, LLC FOR A FACILITY
PERMIT TO CONSTRUCT A 345-KV
TRANSMISSION LINE AND
ASSOCIATED FACILITIES IN DEUEL
COUNTY**

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**SDCL 49-41B-24.1
MOTION TO EXTEND DEADLINE
FOR COMMISSION ACTION
EL18-045**

Pursuant to SDCL 49-41B-24.1 Flying Cow, LLC (here in Applicant) requests the SD Public Utilities Commission (herein Commission) extend the time for a decision in this matter as authorized in SDCL 49-41B-24.1. By way of background and in support of this Motion, the Applicant offers the following:


1. On October 24, 2018 the Applicant filed documents with the Commission to obtain siting/construction approval for a 345 kV transmission line and associated facilities in Deuel County (herein the Project). At the time the application was filed, the Applicant was a wholly-owned subsidiary of Roaring Fork Wind, LLC, the joint venture formed by subsidiaries of its affiliate Renewable Energy Systems of America, Inc. and Vestas Wind Systems A/S.
2. On May 13, 2019 the Applicant notified the Commission through a public filing that its assets were acquired by Avangrid Renewables, LLC. The Project is one such asset that was acquired.
3. Up to the time Avangrid Renewables, LLC acquired the Project, all regulatory work was directed by Renewable Energy Systems of America, Inc. and Vestas Wind Systems A/S as owners.
4. Since the time Avangrid Renewables, LLC acquired the Project, it has worked diligently to complete the regulatory work on the Project, update and assure accuracy of the filing made to date.
5. No requests for intervention have been made by any person.

6. Pursuant to SDCL 49-41B-24 the Commission must issue complete findings within one year of receipt of an application.
7. Unless extended, the "one year deadline" occurs on October 24, 2019.
8. The Applicant now requests additional time to assure the application and data request answers are accurate due to the change in Project ownership, thus making the one-year deadline unworkable.
9. SDCL 49-41B-24.1 gives the Commission authority to extend the above deadline upon request of the applicant.

WHEREFORE, the Applicant respectfully requests the Commission extend the one-year deadline by at least 6 months.

Dated this 31 day of July, 2019.

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CERTIFICATE OF SERVICE

31 Kara C. Semmler of May, Adam, Gerdes & Thompson LLP hereby certifies that on the 31 day of July, 2019, she electronically filed a copy of the foregoing in the above captioned action on the following:

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A handwritten signature in black ink, appearing to read "Kara Semmler". The signature is written in a cursive style with a horizontal line underneath it.

KARA C. SEMMLER