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From the office of Miles F. Schumacher
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June 15, 2022

Ms. Patricia Van Gerpen, Executive Director
South Dakota Public Utilities Commission
Capital Building, 1st Floor
500 East Capital Avenue
Pierre, SD 57501-5070

Re: Docket #EL19-003; Application to the SD PUC for a Facility Permit to Construct
A 300 megawatt Wind Facility

Dear Ms. Van Gerpen:

On May 11, 2022, Crowned Ridge Wind, LLC (“Crowned Ridge Wind”) submitted information in response to data requests submitted by Amber Christenson and Allen Robish, although Crowned Ridge Wind was under no legal obligation to do so. Amber Christenson has filed a second set of data requests as a follow-up to Crowned Ridge Wind’s May 11, 2022, information.

Data requests are only properly served in a contested case under SDCL Chapter 1-26. Commission Docket EL19-003 is no longer a contested case. Accordingly, Crowned Ridge Wind objects to the second set of data requests submitted by Christenson because there is no perpetual right to make data requests on this docket nor legal obligation on Crowned Ridge Wind to respond. Subject to and without waiving this objection, Crowned Ridge Wind stands by the answers submitted in the May 11, 2022, submittal as responsive to the questions asked. The submission of additional information is, therefore, not needed nor warranted to address Christenson’s second set of data requests.

As explained in Crowned Ridge Wind’s May 11, 2022, submittal, on February 4, 2022, Crowned Ridge Wind submitted a Sound Level Compliance Evaluation Report showing Crowned Ridge Wind is in compliance with the Commission’s sound thresholds. On April 11, 2022, Commission’s Staff’s expert David Hessler submitted a report, which also concluded that Crowned Ridge Wind is in compliance with the Commission’s sound thresholds. There is no additional information needed to show compliance with the Commission’s sound thresholds, and, therefore, Crowned Ridge Wind does not view data requests as needed, appropriate, or consistent with statute.

If you have any questions, please let me know.

Yours very truly,

LYNN, JACKSON, SHULTZ & LEBRUN, P.C.



Miles F. Schumacher