

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

IN THE MATTER OF THE APPLICATION)
BY CROWNED RIDGE WIND, LLC FOR A) EL19-003
PERMIT OF A WIND ENERGY FACILITY)
IN GRANT AND CODINGTON COUNTIES) **APPLICANT'S RESPONSES**
) **TO INTERVENOR'S THIRD**
) **SET OF DATA REQUESTS TO**
) **CROWNED RIDGE WIND, LLC**

Attached, please find Applicant's Responses to Intervenor's Third Set of Data
Requests to Crowned Ridge Wind, LLC.

Dated this 23rd day of May, 2019.



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Attorneys for Applicant
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- 3-1) Regarding any affiliated companies or corporations (in this discovery also described as “company” or companies”) of the Applicant identified in the Application an any amendment to the Application, as identified in testimony or provided in disclosure and discovery, please describe any affiliated company’s legal relationship with the Applicant.

Response:

Please see the Amendment to the Application Section 3.0 filed on May 15, 2019. The legal relationship between the companies described in the Amendment to Crowned Ridge Wind, LLC is that of an affiliate.

Also, as originally set forth in the Application in Section 3.0, Crowned Ridge Wind, LLC is a wholly-owned indirect subsidiary of NextEra Energy Resources, LLC.

Respondent: Sam Massey, Director of Renewable Development

- 3-2) Describe any affiliated company’s business relationship with the Applicant regarding the Project (by way of examples only: a relationship under a service agreement, as a vendor, as a service provider, as a contractor, as a consultant, as a participant in a joint operating agreement).

Response:

Yes, Crowned Ridge Wind, LLC will enter into an operation and maintenance agreement with NextEra Energy Operating Services, LLC and an administrative services agreement with NextEra Energy Resources, LLC.

Respondent: Sam Massey, Director of Renewable Development

- 3-3) Having any entities, parties or persons, whether or not participants, waived or agreed to a modification of any of the facility siting requirements identified in the statutes and rules described on Table 1.2 of the Application under agreement or agreements held by the Applicant or any of its affiliates? If so, provide documentation, including any agreements.

Response:

Please see the following provision in the easement agreements: Crowned Ridge Wind, LLC (Section 11.4.), which is Confidential Attachment 1 to Crowned Ridge Wind’s response to Staff 1-7. The Boulevard Associates, LLC easement agreements contain the same provision. In the Cattle Ridge Wind Farm, LLC (Section 5.4), which is Confidential Attachment 2 to Crowned Ridge Wind’s response to Staff 1-7.

Respondent: Tyler Wilhelm, Project Manager

- 3-4) Have any entities, parties or persons, whether or not participants, waived or agreed to a modification of any local rules or ordinances which relate to this facility siting application under an agreement with the Applicant or with an affiliate of the Applicant?

If so provide documentation, including any agreements.

Response:

Please see response to 3-3.

Respondent: Tyler Wilhelm, Project Manager

- 3-5) Have any entities, parties or persons, whether or not participants, with whom the Applicant has entered into, itself or by way of an affiliate, an option, lease or easement agreement by giving the option of withdrawal from any such agreement? If so, provide documentation, including any agreements.

Response: No.

Respondent: Tyler Wilhelm, Project Manager

- 3-6) Have any entities, parties or persons, whether or not participants, with whom the Applicant has entered into, itself or by way of an affiliate, an option, lease or easement agreement, waived any audio, visual, view, light, shadow flicker, vibration, air turbulence, wake, electromagnetic, ice, or other weather created hazards or events resulting directly or indirectly regarding the operation of Applicants proposed Project under safety, regulatory or environmental standards as those are described in the Application. If so, provide documentation, including any agreements.

Response:

Please see the following provision in the easement agreements: Crowned Ridge Wind, LLC (Section 5.2), which is Confidential Attachment 1 to Crowned Ridge Wind's response to Staff 1-7. The Boulevard Associates, LLC easement agreements contain the same provision.

Respondent: Tyler Wilhelm, Project Manager

- 3-7) Have any entities, parties or persons, whether or not participants, with whom the Applicant has entered into, itself or by way of an affiliate, an option, lease or easement agreement, waived any audio, visual, view, light, shadow flicker, vibration, air turbulence, wake, electromagnetic, ice, or other weather created hazards or events resulting directly or indirectly regarding the operation of Applicants proposed Project as those standards are designated by federal, state or local law related to the siting of a wind energy facility? If so, provide documentation, including any agreements.

Response:

Please see response to 3-6.

Respondent: Tyler Wilhelm, Project Manager

- 3-8) Have any entities, parties or persons, whether or not participants, with whom the Applicant has entered into, itself or by way of an affiliate, an option, lease or easement agreement, waived any audio, visual, view, light, shadow flicker, vibration, air turbulence, wake, electromagnetic, ice, or other weather created hazards or events resulting directly or indirectly from the operation of Applicants propose project? If so, provide documentation, including any agreements.

Response:

Please see response to 3-6.

Respondent: Tyler Wilhelm, Project Manager