

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

IN THE MATTER OF THE)	
APPLICATION OF CROWNED)	
RIDGE WIND, LLC FOR A)	RESPONSE
PERMIT OF A WIND ENERGY)	TO COMPLAINT
FACILITY IN GRANT)	EL-19-003
AND CODINGTON COUNTIES)	

RESPONSE OF CROWNED RIDGE WIND, LLC

On October 25, 2019, Amber Christenson, an Intervenor, filed a complaint asserting that Crowned Ridge Wind, LLC (“CRW”) started construction on alternative turbine location no. 68 (“Complaint”). The Compliant includes a picture showing the disturbance of dirt in a field. The Complaint demands that the Commission hold CRW to its testimony that construction on alternative turbine location no. 68 would be an option of last resort.

CRW has not started construction on alternative turbine location no. 68. As explained in the attached Affidavit of Tyler Wilhelm, the disturbance of dirt shown in the Complaint is related to a landowner burying rocks and has no relationship to CRW or the CRW project. Thus, the Complaint incorrectly asserts that CRW has started construction on alternative turbine location no. 68. As such, the Complaint should be summarily dismissed.

Dated: October 30, 2019



Miles Schumacher
Lynn, Jackson, Shultz & Lebrun, P.C.
110 N. Minnesota Ave., Suite 400
Sioux Falls, SD 57104
mschumacher@lynnjackson.com
Office (605) 332-5599

Brian J. Murphy
Managing Attorney
NextEra Energy Resources, LLC
700 Universe Boulevard
Juno Beach, Florida 33408
Brian.J.Murphy@nee.com
Office (561) 694-3814
Admitted Pro Hac Vice

Attorneys for Crowned Ridge Wind, LLC