

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

IN THE MATTER OF THE APPLICATION)
BY CROWNED RIDGE WIND II, LLC FOR)
A PERMIT OF A WIND ENERGY)
FACILITY IN DEUEL, GRANT)
AND CODINGTON COUNTIES)

EL19-027

) **APPLICANT'S RESPONSES TO**
) **INTERVENORS AMBER**
) **CHRISTENSON, KRISTI MOGEN**
) **AND ALLEN ROBISH'S SECOND**
) **SET OF DATA REQUESTS TO**
) **APPLICANT**

Attached please find Applicant's Responses to Intervenor Amber Christenson, Kristi Mogen and Allen Robish's Second Set of Data Requests to Applicant.

Dated December 12, 2019.



Miles F. Schumacher
Attorneys for Applicant
Lynn, Jackson, Shultz & Lebrun, PC
110 N. Minnesota Ave., Suite 400
Sioux Falls, SD 57104

- 2-1) Please provide a manufacturers diagram with specifics of each style of blade that will be used in the CRWII project.

Response: Crowned Ridge Wind II objects to Data Request 2-1, because it requests third-party confidential information and the third-party does not consent to the disclosure of the information. Therefore, no information is provided.

Respondent: Miles Schumacher, Attorney.

- 2-2) Please provide photographs of each style of blade that will be used in the CRWII project. Include photographs of all sides of the blade, with special attention to LNTE.

Response: Please find photos of turbine blades with LNTE and without LNTE that are similar to those that will be used by CRW II provided in Attachment 1.

Respondent: Mark Thompson, Manager Wind Engineer

- 2-3) Please provide the weight of each blade to be used in the CRWII facility.

Response: The weight of each blade to be used for Crowned Ridge Wind II is 25,203.46 pounds.

Respondent: Mark Thompson, Manager Wind Engineer

- 2-4) Are the blades being used, including LNTE blades, the best available technology?

Response: Crowned Ridge Wind II objects to the term “best available technology” as vague and subject to different interpretations. Subject to and without waiving the objection, Crowned Ridge Wind responses that to the best of the knowledge of Crowned Ridge, LNTE blades are widely used and the best available technology for the purpose stated in the Application at page 21, which is to reduce the sound pressure levels in order to achieve compliance with county regulations by increasing the flexibility in turbine locations to meet setback requirements.

Respondent: Mark Thompson, Manager Wind Engineer

- 2-5) Please provide the company, country of origin and date of purchase of the components of each turbine of the project. Include the tower sections, blades, and nacelle housing.

Response: Response: General Electric is the supplier of all turbine components, including tower sections, blades and nacelle housing as a complete unit. The date of purchase of the safe harbor turbines was June 28, 2016, and the non-safe harbor turbines was September 26, 2018.

Crowned Ridge Wind II objects to the request for the country or origin of the turbine components, because it seeks information that is not reasonably calculated to lead to the discovery of admissible evidence in this proceeding before the PUC. Subject to and without waiving the objection, Crowned Ridge does not know the country of origin of the turbine components.

Respondent: Mark Thompson, Manager Wind Engineer

- 2-6) Referring to your application, Page 24, Concrete batch plant “A large amount of concrete is needed for turbine foundations. “ How many tons of concrete is used in each style of turbine foundation (spread foot style and P&H style)?

Response: There are approximately 391 cubic yards of concrete in a spread foot style foundation. There are approximately 168 cubic yards of concrete in a P&H style foundation.

Respondent: Mark Thompson, Manager Wind Engineer

- 2-7) Referring to your application, Page 33, Geological “However, the relatively inert turbine foundation materials...” How many tons of rebar is used in each style of turbine foundations (spread foot style and P&H style)?

Response: There are approximately 27 tons of rebar in a spread foot style foundation. There is approximately 1 ton of rebar in a P&H style foundation.

Respondent: Mark Thompson, Manager Wind Engineer

2-8) a. Will the Applicant adhere to the Conditional Use Permits and Special Exception Permit issued by the respective counties?

b. By way of explanation, does Crowned Ridge Wind II agree to follow the application and presentation it submitted to each county and abide by its representations to the Board and the Public? If any variation is expected from what has been permitted in each county, explain the variation in detail and provide the notification to the respective county and the approval the Applicant has received.

Response: a. Yes, Crowned Ridge Wind will comply with the Conditional Use Permits and Special Exception Permit issued by the respective counties, and has no plans to vary from the the Conditional Use Permits and Special Exception Permit. b. Crowned Ridge Wind II objects to Data Request 2-8, because it calls for a legal conclusion and seeks information that is not reasonably calculated to lead to the discovery of admissible evidence in this proceeding before the PUC.

Respondent: a. Tyler Wilhelm, Senior Project Manager; b. Miles Schumacher, Attorney

2-9) In accordance with ASRD 20:10:22:09 “applicant *shall* describe the estimated construction cost ...” provide the construction cost, specifically.

Response: Section 5 of the Application provides a \$425 million estimate for the cost of construction.

Respondent: Mark Thompson, Manager Wind Engineer

2-10) Page 18 of the application, section 5.0, estimated costs of facility, “Fluctuations in capital costs could be as much as 20% for the Project, dependent on final micro-siting and MISO interconnection costs.” Please provide the document that requires the applicant to pay for MISO interconnection costs.

Response: See Attachment 1, which is the Generator Interconnection Agreement.

Respondent: Tyler Wilhelm, Senior Project Manager

2-11) Has the applicant completed full title searches on each parcel of land the applicant claims to have property rights?

Response: Applicant has ordered title commitments from Stewart Title Guaranty Company for each parcel of land with proposed project infrastructure. At this time, 100% of the title commitments have been received and are under review by Applicant. We anticipate that title review will be completed by the end of January, 2020.

Respondent: Tyler Wilhelm, Senior Project Manager

2-12) Will the applicant mortgage or leverage the assets of the project?

Response: The Applicant has no current plans to mortgage or leverage the assets of the project, with the understanding that after the transfer of Crowned Ridge Wind II to Northern States Power Company (NSP), NSP may issue bonds or raise other financing which uses the project's assets as collateral.

Respondent: Tyler Wilhelm, Senior Project Manager

2-13) Is the CRWII project still being purchased by Excel Energy?

Response: Data Request 2-13 incorrectly references Xcel as the purchaser for the wind project, instead of Northern States Power Company (NSP), the entity that executed the Purchase and Sale Agreement. Yes, Crowned Ridge Wind II, LLC will still be purchased by NSP.

Respondent: Tyler Wilhelm, Senior Project Manager

2-14) If the manufacturer of the turbines should go bankrupt, how would that affect the warranty and viability of the project?

Response: Crowned Ridge Wind II objects to Data Request 2-14, because it calls for speculation regarding future events and for a legal conclusion. Subject to and without waiving the objection Crowned Ridge Wind II responds that to the best of Crowned Ridge Wind II's knowledge there should be no impact to the viability of the project due to a wind turbine manufacturer going into bankruptcy. Any impacts of a bankruptcy of a wind turbine manufacturer on the project would depend on the facts and circumstances of the bankruptcy.

Respondent: Tyler Wilhelm, Senior Project Manager

2-15) The Applicant has provided a variance of sound and flicker properties for a 200 MW project. Please provide a map and overhead photos (as required by the ARSD) associated with the corresponding 200 MW project showing all turbines, connections, crane paths, feeder lines and any other associated changes with a reduction to 200 MW.

Response: The requested map was filed as Exhibit TW-S-2 to Tyler Wilhelm's Supplemental Testimony filed on September 20, 2019, which can be obtained by downloading it on the Commission's Docket No. EL19-027 web site.

Respondent: Tyler Wilhelm, Senior Project Manager

- 2-16) Considering the 200 MW version of the project, has each county been notified of the substantial reduction of the project? Please provide all correspondence.

Response: Crowned Ridge Wind II objects to the characterization of the project as “substantial” reduced. As explained in the Supplemental Testimonies of Hart and Wilhelm, Crowned Ridge Wind II has deferred 100 MWs of the wind project until it receives the results of interconnection studies. Attachment 1 includes the correspondence explaining the potential deferral of 100 MWs with Grant, Codington, and Deuel counties.

Respondent: Tyler Wilhelm, Senior Project Manager

- 2-17) In the last two years, has the Purchase Sale Agreement with Excel changed to reflect a different number of megawatts to be developed for Excel? If so, what changed?

Response: Data Request 2-17 incorrectly references Xcel as the purchaser for the wind project, instead of Northern States Power Company (NSP), the entity that executed the Purchase and Sale Agreement (PSA). The PSA with NSP provided for the development and sale of a wind project with a maximum size of 300.6 megawatts, and with the ability, under certain circumstances, for NSP to elect to downsize the project to a maximum size of 200 megawatts. NSP exercised its downsize rights on August 16, 2019. However, an amendment to the PSA also requires the parties to work together in good faith to determine if other mutually agreeable opportunities may exist to increase the project size back to 300.6 megawatts, including the potential utilization of alternative interconnection queue positions, including MISO queue position J722, which is explained in the supplemental testimony of witness Hart.

Respondent: Daryl Hart, Director Business Development

- 2-18) Has the applicant done any studies on human, plant and animal communities, including terrestrial ecosystems and aquatic ecosystems in regard to the effects listed in section 5.2 of the applicant’s wind easement/land lease? Specifically, “5.2 Effects Easement. Owner grants to Operator a non-exclusive easement for audio, visual, view, light, flicker, noise, shadow, vibration, air turbulence, wake, electromagnetic, electrical and radio frequency interference, and any other effects attributable to the Wind Farm or activity located on the Owner's Property or on adjacent properties over and across the Owner's Property ("Effects Easement").” <https://puc.sd.gov/commission/dockets/electric/2019/EL19-027/attachmentb.pdf> . If so, provide the studies.

Response: Crowned Ridge Wind II has completed a number of studies in support of its application that have been filed in this docket and can be downloaded from the Commission's docket, and some of these studies also address subjects that are listed in Section 5.2 of the referenced easement.

Respondent: Daryl Hart, Director Business Development