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Sent: Friday, January 3, 2020 11:41 AM

To: PUC-PUC <PUC@state.sd.us>

Subject: [EXT] Docket EL 19-003

Dear PUC Commissioners & Staff

Please post these public comments on Docket EL 19-003
Crowned Ridge

I listened to the entire ad hoc meeting last week on Crowned Ridge's request for a waiver because they did not have the LNTE blades in place in time to start generation. It was obvious to anybody that listened that:

1. They never intended to install this LNTE attachment to all of the turbines, and possibly not install it on any turbines UNTIL THEY GOT CAUGHT. Then they self reported, just like Prevailing Winds did when they got caught starting early. Is anybody naive enough to think that if the blades were on site in July that they didn't have enough time to attach this LNTE attachment while the blades were on the ground in good weather in a horizontal position, but instead they were going to wait until all 87 turbines were in the air over 500 ft. then walk the 600 ft. crane around a 2nd time to all 87 turbines and install this attachment? Of course not. They had no intentions of installing this attachment UNTIL THEY GOT CAUGHT NOT DOING IT.

2. They built 90 meter hub height towers instead of the permitted 80 meter hub height. Commissioner Fiegen was totally embarrassing herself at the ad hoc meeting when she kept referring to 80 ft. vs. 90 ft. No, it's 80 meters vs. 90 meters. A meter is 39.37 inches. A foot is 12 inches. It makes one wonder about the PUC's knowledge of any of this.

3. Crowned Ridge erected 2.7 MW turbines and was only permitted for 2.3 MW turbines. This is a blatant violation of the permit. Commissioner Nelson asked a very pertinent question in what name plate were they going to use to pay the name plate tax to the state. The answer was 2.3. But the name plate on the unit is 2.7. What they were going to do was pay taxes on 2.3 and generate 2.7. Who is going to check on the output of each turbine and who from the PUC is going to know about

the "software" that controls the generator and limits it to 2.3?? If a spot check was done to check the output, look at all the variables, namely the wind speed. These things fluctuate by the minute, and if they knew you were coming, they could change the software with a few keystrokes and nobody would ever know. At the end of the year when they add up the MW produced, they may come in at a few percentage points in efficiency higher than normal, but in tax credits, that might amount to hundreds of thousands of dollars.

Commissioner Fiegen said something very important at the end. She said "Trust is really important". Well she is right, and it's also important to the citizens of South Dakota that we can trust the PUC to do their job and enforce the law. If the PUC does not reject this waiver, and possibly gives Crowned Ridge a monetary fine, which they will pay for this with production tax credit money, then South Dakota has endorsed "Breaking the law is fine for those people with enough money". That's not the way it should be, but the PUC doesn't seem to have any oversight and from what I've seen so far, Big Wind owns South Dakota. Only the 8 turbines with the LNTE are permitted to start up. Even if the rest of the turbines make ZERO noise, it doesn't make a difference. That's not the point. The condition that the blades be equipped with LNTE before they start turning is the point. **Because it's the law.** Reject this waiver and enforce the laws you were elected to enforce.

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