## LAW OFFICES Lynn, Jackson, Shultz & Lebrun, p.c.

LAWYERS ALSO ADMITTED IN MINNESOTA, IOWA, NORTH DAKOTA, AND WYOMING

www.lynnjackson.com Member of Lex Mundi A Global Association of 125 Independent Law Firms

> 135 E. Colorado Boulevard Spearfish, SD 57783-2755 605-722-9000 Fax 605-722-9001

909 St. Joseph Street Suite 800 Rapid City, SD 57701-3301 605-342-2592 Fax 605-342-5185

REPLY TO: Sioux Falls 605-332-5999

From the office of Miles F. Schumacher e-mail address: mschumacher@lynnjackson.com

June 5, 2019

## **Via Electronic Filing**

Ms. Patricia Van Gerpen, Executive Director South Dakota Public Utilities Commission Capital Building, 1<sup>st</sup> Floor 500 East Capital Avenue

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

Dear Ms. Van Gerpen:

Attached for filing are bates stamped copies of the hearing exhibits for Crowned Ridge Wind, LLC, identified as Exhibits A1 through A44-2, as well as a Certificate of Service.

Please note that the Application (Exhibits A1 and A1-A through A1-M) is not being refiled.

Exhibits A7-2, A7-3, A7-4, A7-5, A16-1, A26-1, A32-1, A37-1 and A46 are being submitted as Confidential. Exhibits A26-1, A32-1 and A37-1 contain proprietary trade secret information belonging to General Electric Company ("GE") and should be made available only to the attorneys. The information contained in these exhibits would provide an advantage to a competitor if known. Crowned Ridge Wind, LLC, on behalf of itself and GE, request that the documents be maintained confidential in perpetuity. Questions regarding this confidentiality request can be directed to the undersigned, Miles F. Schumacher. Confidentiality is requested for this trade secret information pursuant to SDCL Section 1-27-1.5 and ARSD 20:10:01:39 – 20:10:01:45. The factual basis that qualifies the information for confidentiality is that the information is proprietary, is subject to a non-disclosure agreement between Crowned Ridge Wind, LLC and GE and is being provided with permission by GE only if it remains confidential trade secret, with the exception that it may be reviewed by the Commission and Commission Staff.

Copies of Exhibits A26-1, A32-1 and A37-1 are being provided only to the Commission and the Commission Staff, subject to the above paragraph.

110 N. Minnesota Avenue Suite 400 Sioux Falls, SD 57104 605-332-5999 Fax 605-332-4249 Ms. Patricia Van Gerpen, Executive Director June 5, 2019 Page 2

In addition, for your reference the following is a listing of the new exhibits being filed that were not contained in the Witness and Exhibit List previously filed in this matter:

Exhibit A45 – Applicant's Responses to Intervenor's Fifth Set of Data Requests to Crowned Ridge Wind, LLC.

Exhibit A45-1 – Attachment 1 to 5-2

Exhibit A45-2 – Attachment 1 to 5-5

Exhibit A45-3 – Attachment 1 to 5-7

Exhibit A45-4 – Attachment 1 to 5-12

Exhibit A46 – Confidential Applicant's Responses to Staff's Sixth Set of Data Requests to Crowned Ridge Wind, LLC.

Exhibit A46-1 – Attachment 1 to 6-1

Exhibit A46-2 – Attachment 1 to 6-2

If there are any questions, please contact me.

Yours very truly,

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

Miles F. Schumacher MFS/kab

Enclosures