

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

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

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\*                   **STAFF'S FIRST SET OF DATA**  
\*                   **REQUESTS TO MS. MOGEN**  
\*                   **REGARDING THE REQUEST FOR**  
\*                   **LIMITED AND TEMPORARY WAIVER**  
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\*                   **EL19-003**  
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Below, please find Staff's First Set of Data Requests to Ms. Mogen regarding Crowned Ridge Wind, LLC's request for limited and temporary waiver. Please submit responses by 5:00 p.m. on December 27, 2019, or promptly contact Staff to discuss an alternative arrangement.

- 1-1) During the December 20, 2019, Commission meeting, Ms. Mogen stated that Staff's memorandum filed on December 18, 2019, contained inaccuracies when compared to Mr. Joshua Tran's affidavit. Staff Analyst Mr. Kearney tried to address Ms. Mogen's accuracy concerns at the meeting.

Did Mr. Kearney's response at the Commission meeting address Ms. Mogen's concerns regarding the accuracy of Staff's memorandum? If no, please provide a list of all inaccuracies within Staff's memorandum, with documentation or references to the filings that support the claim of a factual inaccuracy.

**YES, thank you**

- 1-2) During the December 20, 2019, Commission meeting, Ms. Mogen stated that she had an expert reviewing Crowned Ridge Wind, LLC's waiver request. **I'm sorry, did I say I had one? If so, I misspoke, we have been trying to find an expert to help review the waiver, but with such short notice and the holidays we have not found an expert to help.**
- a. Please provide the name, address, phone number, and credentials of the expert reviewing the filing.
  - b. Please provide the results of the expert witness' analysis of the waiver request, including all supporting work papers and documentation.

Dated this 20th day of December 2019.

*Amanda M. Reiss*

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