

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

**IN THE MATTER OF THE APPLICATION OF
CROWNED RIDGE WIND, LLC FOR A FACILITIES PERMIT TO
CONSTRUCTION 300 MEGAWATT WIND FACILITY**

Docket No. EL19-027

**REBUTTAL TESTIMONY
OF RICHARD LAMPETER**

January 8, 2020

1 **AROUND THE MODELED SOUND LEVEL, WHICH MAY BE REGARDED AS**
2 **THE LONG-TERM MEAN LEVEL.” DO YOU AGREE WITH THIS**
3 **TESTIMONY?**

4 A. I disagree with this testimony. The modeling parameters used by EAPC Wind Energy for
5 the CRW II sound study mitigates the fluctuation referred to by Mr. Hessler, because it
6 uses reasonable and conservative assumptions, including: (1) a ground attenuation factor
7 of 0.5; (2) an uncertainty factor of two decibels for all wind turbines; (3) all modeled sound
8 sources are assumed to be operating simultaneously and at the design wind speed
9 corresponding to the greatest sound level impacts; (4) the selection of meteorological
10 conditions to minimize atmospheric attenuation in the 500 Hz and 1 kHz octave bands
11 where the human ear is most sensitive; and (5) pursuant to the ISO 9613-2 standard, the
12 use of favorable conditions for sound propagation (a moderate, well developed ground-
13 based temperature inversion as might occur on a calm clear night or equivalently downwind
14 propagation). Based on the combination of these modeling assumptions and parameters,
15 the model yields conservative results which reflect the short-term sound levels for
16 evaluation of the proposed conditions identified in the Proposed Post-Construction Sound
17 Protocol and not a long-term mean level. As such, actual sound levels for an operational
18 wind project are not expected to be +5 dBA as compared to the modeled sound levels. This
19 conclusion is supported by post-construction measurement programs conducted by Epsilon
20 for other wind projects which have found that measured sound levels have met similar
21 regulatory limits for projects and were not +5 dBA compared to the modeled sound levels
22 where the pre-construction modeling analysis followed a similar modeling methodology.

23
24 **Q. STAFF WITNESS HESSLER (PAGES 7-8; EXHIBIT DMH-2) RECOMMENDS**
25 **CERTAIN CHANGES TO THE POST CONSTRUCTION SOUND PROTOCOL**
26 **THAT YOU PROPOSED IN YOUR DIRECT TESTIMONY. DO YOU AGREE**
27 **WITH THE PROPOSED CHANGES?**

28 A. I have no objection to Mr. Hessler’s recommended changes to the post-construction sound
29 protocol I proposed in my Direct Testimony.

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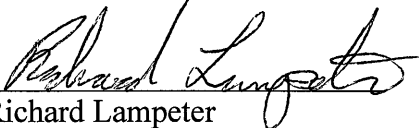
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1 Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

2 A. Yes.

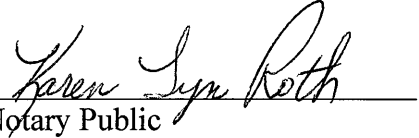
STATE OF MASSACHUSETTS)
) ss
COUNTY OF MIDDLESEX)

I, Richard Lampeter, being duly sworn on oath, depose and state that I am the witness identified in the foregoing prepared testimony and I am familiar with its contents, and that the facts set forth are true to the best of my knowledge, information and belief.



Richard Lampeter

Subscribed and sworn to before me this 8th day of January, 2020.

SEAL


Notary Public

My Commission Expires

 KAREN LYN ROTH
Notary Public
Commonwealth of Massachusetts
My Commission Expires
April 10, 2026