

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

**IN THE MATTER OF THE APPLICATION BY DEUEL HARVEST WIND ENERGY  
SOUTH LLC FOR ENERGY FACILITY PERMITS OF A WIND ENERGY FACILITY  
AND A 345 KV TRANSMISSION FACILITY IN DEUEL COUNTY, SOUTH DAKOTA  
FOR THE SOUTH DEUEL WIND PROJECT**

**SD PUC DOCKET EL24-023**

**PRE-FILED REBUTTAL TESTIMONY OF ALEXANDRA THOMPSON  
ON BEHALF OF DEUEL HARVEST WIND ENERGY SOUTH LLC**

December 5, 2024

1 **I. INTRODUCTION**

2 **Q. Please state your name.**

3 A. My name is Alexandra Thompson.

4  
5 **Q. Have you previously provided testimony in this docket?**

6 A. Yes. I submitted Direct Testimony in this docket on behalf of Deuel Harvest Wind  
7 Energy South LLC (“South Deuel Wind”) in support of its Facility Permit Application  
8 (“Application”) to the South Dakota Public Utilities Commission (“Commission”) on  
9 June 28, 2024.

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11 **II. PURPOSE OF TESTIMONY**

12 **Q. What is the purpose of your Rebuttal Testimony?**

13 A. The purpose of my Rebuttal Testimony is to respond to the direct testimony of  
14 Commission Staff (“Staff”) witness Mr. Jon Thurber regarding turbine flexibility and  
15 a condition regarding determinations from the Federal Aviation Administration  
16 (“FAA”).

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18 **III. RESPONSE TO STAFF TESTIMONY**

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20 **Q. Did you review the Direct Testimony of Commission Staff witness Mr. Jon  
21 Thurber?**

22 A. Yes. South Deuel Wind appreciates Mr. Thurber’s and Staff’s thorough review of  
23 the Application, appendices, and the responses to data requests submitted in this  
24 proceeding.

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26 **Q. On page 5, Mr. Thurber suggests that turbine flexibility for the project should  
27 be limited to two possible turbine models. What is your response?**

28 A. South Deuel Wind continues to request that the Commission provide for the  
29 requested turbine flexibility. The Application identifies three models by three

30 different manufacturers. With respect to size, one is a 3.8 MW machine (GE 3.8-  
31 154) and the other two are very similar, 4.4 MW (SG 4.4-164) and 4.5 MW (V163-  
32 4.5). South Deuel Wind has requested that the Commission authorize use of these  
33 turbine models or turbines of comparable capacity and specifications.  
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35 As noted in South Deuel Wind's discovery response 1-18, contained in Exhibit JT-  
36 1, limiting a project to installing a singular turbine model adds risk and significantly  
37 reduces a project's ability to negotiate cost-effective turbine supply agreements. If  
38 only one turbine model is permitted for a project, the vendor of that turbine model  
39 would hold substantial leverage during negotiations and may result in additional  
40 costs for the ultimate customer(s) of the project. Additionally, turbine supply  
41 agreements are typically executed after key permits are obtained because they  
42 require significant capital expenditure that would be at risk pending the necessary  
43 approval.  
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45 Because the Commission will ultimately have approval over the final turbine  
46 locations and supporting shadow flicker and noise studies, South Deuel Wind  
47 believes this flexibility is reasonable.  
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49 **Q. On page 18, Mr. Thurber supports a condition recommended by the Lake**  
50 **Cochrane Improvement Association ("LCIA") that "any PUC approval of sites**  
51 **21, 22, and 49 in this matter be made contingent upon any future FAA's**  
52 **findings that none of them, in fact, are deemed to be hazards to aviation."**  
53 **What is your response to that proposal?**

54 A. South Deuel Wind agrees that a turbine location that has received a final  
55 determination of hazard should not be utilized for the Project. South Deuel Wind  
56 has worked with Mr. Holden and LCIA regarding this condition. South Deuel Wind  
57 proposed the following language which South Deuel Wind believes addresses their  
58 concerns:

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South Deuel Wind will not construct any turbine location that has received a final determination of hazard. The Project will abide by any conditions as determined by the FAA for turbine locations that have received a final determination of no hazard with conditions.

**Q. Has Mr. Holden or LCIA responded to the proposed condition?**

A. Not as of the date of the filing of this testimony.

**IV. CONCLUSION**

**Q. Does this conclude your testimony?**

A. Yes.

Dated this 5<sup>th</sup> day of December, 2024

*Alexandra Thompson*

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Alexandra Thompson