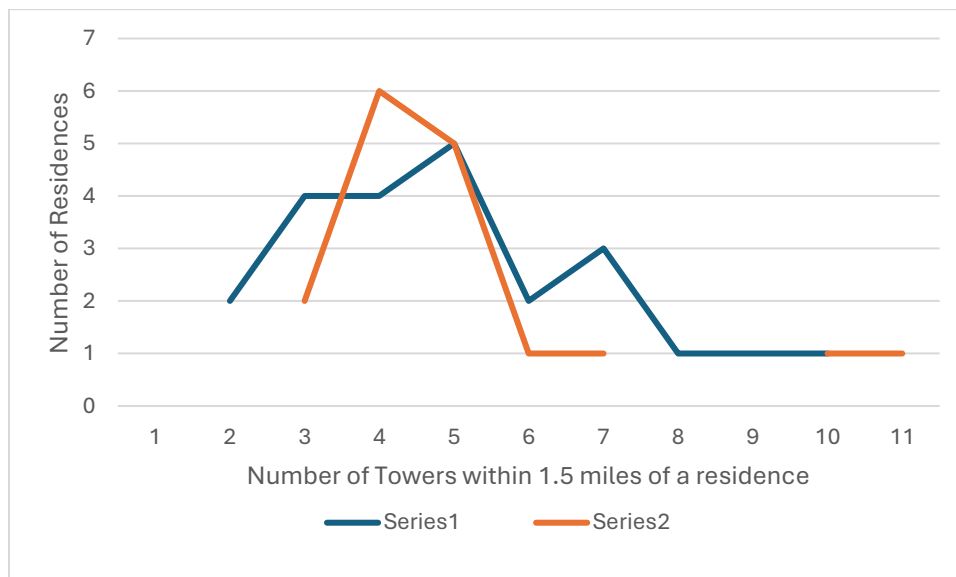


My name is Arla Hamann Poindexter. I am here today as a resident at 18280 480th Ave, Clear Lake, SD. I manage and operate acres that are owned by Hamann Family Farms LLC. Hamann Family Farms has acres within the project area and acres immediately adjacent to the project area. In the last 25 years, those acres have been managed with a priority on soil health and conservation. As a family ranch, we won a statewide conservation award in 2017. I'll dive into the principles of soil health in a little bit, but this concept is a cornerstone of my personal values and professional success.

This project is not wanted by the majority of people within the project area. More residences are listed on the map as non-participants than participants. Residents of the project area are going to be bearing the burden of construction and operation of the project. First let's look at the potential for turbines to be more burdensome for non-participants than participants with the chart below. I counted the residences that will have towers with 1.5 miles of a tower. I chose 1.5 miles because this is the setback from the towns of Toronto, Astoria, and Brandt. This left axis of the graph is the number of residences who will have a corresponding number of towers noted on the bottom axis. Series 1 (the blue line) is non-participants, Series 2 (orange line) is participants. As we can see, the most affected person is a participant. However, more towers will be within 1.5 miles of non-participants than participants. Those non-participants also have more towers on average within 1.5 miles than participants.

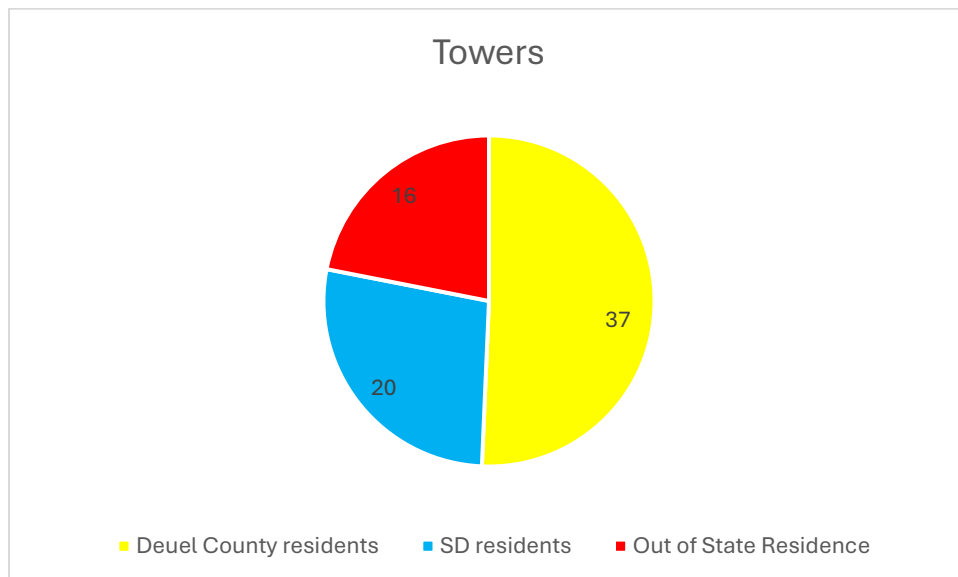


When I asked Invenergy in discovery about the noise level within 1.5 miles of the construction site, they responded that would be about 50dbA. When compared to an office or a normal conversation this noise level doesn't seem so bad at face value. But this is a noise level that will be heard constantly throughout the construction phase. And it fails to consider the traffic by a residence and the safety issues of multiple trucks on county and township roads, most of which are gravel.

Noise levels during operations at 1.5 miles is expected to be less than whisper. Again, that doesn't seem like much of an annoyance. But imagine if your spouse was whispering all night while you were trying to sleep. Or your child was whispering in your ear when you were working on an important project. Would that level of sound be conducive to your best self? Your healthiest self? Your most productive self? And we aren't just talking about the people who are getting paid by Invenergy; we're talking about people who value their way of life more than Invenergy's money.

The proposed project damages the way of life for all residents, but especially non-participants. Invenergy and participants negotiated a value that monetizes what we love about rural living. A value was established in exchange for quiet evenings, uninterrupted skylines, and wildlife coming to the backyard. But this value became a commodity, a "take it or leave it" offer. However, unlike the commodities most of us in the project area are used to dealing with (corn, soybeans, livestock), there is no anti-trust agency that protects us from Invenergy monopolizing the market. But that's what Invenergy has done: Invenergy is a monopoly of wind easements in Deuel County. There is no alternative market. There is no coffee shop rumor mill where residents can see if a different company might provide a different contract. There is only Invenergy.

I want to switch gears a little and talk about the economic impact of the proposed project. I don't believe that it will be the boom that the company claims it to be. Let's look at the money from tower contracts. I asked the Deuel County Treasurer to provide the City or State where landowners receive their tax notices, this is all public information and available at Deuel County Courthouse. Of the 73 towers on the map, basically half do not have a residence in Deuel County (please see the graph below). Although 27% of the non residents do live in SD, I doubt these people are contributing to the Deuel County economy besides their property tax and the occasional tank of gas or meal. Interestingly, 22% of the towers are going to be placed on land owned by out-of staters. These landowners get their tax notices in Arizona, Texas, Nevada, Ohio, Wyoming, Nebraska, Iowa and Minnesota. It is very doubtful these landowners contribute anything to the Deuel County economy besides their property tax.



I'd like to explore the economic harm of Invenergy's spray plane policy. In 2024, my family (and several other producers) had soybeans that needed late season fungicide application. We chose to hire a spray plane because fungi damage can cause 1 bushel per acre per day loss. The plane was able to apply the fungicide the same day the soybeans were scouted. Under Invenergy's policy, we would have had a 3 day wait (if the conditions held) and would have lost a minimum of 3 bushels/acre. Our farm in Brandt Township is approximately 150 acres. We would have lost a total 450 bushels because of Invenergy's policy. At \$10/bushel sale price, that would have been \$4,500 in uncompensated loss for just our farm. There are other non-participating landowners who farm, as well as tenants on participant farms who would receive no compensation for their productivity losses. Invenergy's policy is an unacceptable economic burden to producers in the project area.

Now let's look at the absence of Invenergy as a corporate presence in Deuel County. Granted, Invenergy has employees who live in South Dakota. However, at the public meeting in Aug, the Company had no idea how many lived in Deuel County. I have my doubts that Invenergy can be a good neighbor when they have so few corporate resources in Deuel County or South Dakota. A quick look at Invenergy's website shows worldwide offices, but none in South Dakota. In the documents attached to the project application, a number of resumes showed experience in South Dakota. But none of these people had a South Dakota address or education at a South Dakota university. Even the legal representation for Invenergy is located outside of South Dakota.

The Company spends a lot of time talking about the taxes they'll contribute. In discovery, I asked Invenergy specific questions about taxes. Invenergy responded the taxes were expected to be \$561,000 per tower over the expected 30 years of the project. This works out to about \$18,700 per tower per year. So annually, the 68 tower project will expect to pay \$1,271,600 per year.

I was curious how that compares to the individuals and small businesses that pay taxes in Deuel County. So I asked the County Treasurer for a little data; again this data is public and available at the Deuel County Courthouse. The chart shows the taxes collected in townships. I asked specifically what Lake Cochrane contributes because I think it's important to consider that seasonal tourism and recreation might be as important to the Deuel County economy as another wind project. I included the County Treasurer's rough estimate of the highest 15 tax payers so we could consider that Deuel County is an economy of successful small businesses. I included Hamann Family Farms, LLC as a reference to just one of those successful small businesses.

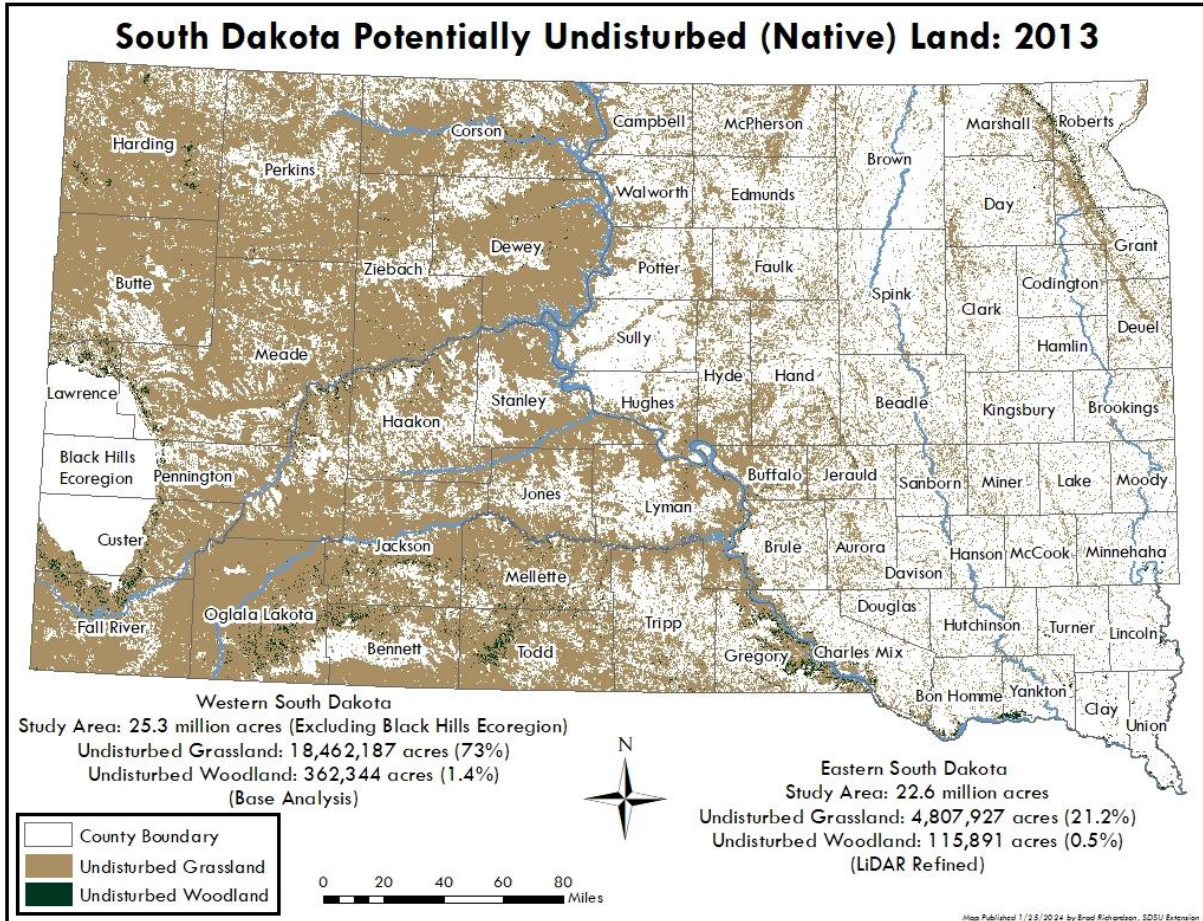
| Tax District | Annual Collections |
|--------------------------------------|---------------------------|
| Lake Cochrane | \$1,216,848.47 |
| Norden Township | \$594,321.98 |
| Brandt Township | \$516,777.41 |
| Scandinavia Township | \$1,144,791.02 |
| Blom Township | \$524,958.72 |
| Estimate of the highest 15 taxpayers | \$570,000.00 |
| Hamann Family Farms LLC | \$46,371.26 |

But even if you believe this is economic growth, let's talk about economic indicators of Deuel County. I used the Census Quick Facts page and the SD Kids Count Data as my data sources. These 2 sources use census data or estimates and are reported consistently across the nation. Let's first look at the median income: Deuel County has a median household income higher than the state (Deuel \$76,997. SD \$69,457). Deuel County has a lower percentage of people in poverty (Deuel 8.5%. SD 11.8%). Per capita income is very comparable (Deuel \$35,754 SD \$36,850). Economic indicators are even more positive for children who live in Deuel County than their peers statewide. 18.7% of children in Deuel County receive free or reduced priced lunch as compared to 32.2% in SD. 9% of children live in poverty in Deuel County as compared to 15.1% statewide. Children in Deuel County are more food secure than the average child in SD (9.8% insecure in Deuel, 11.2% in SD) and are more likely to have a stay at home parent (76.8% of children in Deuel County have all parents in the workforce, 78.9% of SD children have all parents in the workforce). My point with this data is that this proposed wind project will do little to improve the economy of Deuel County.

Now, I'd like to switch gears for a minute and talk about the concerns to wildlife. I'd appreciate if you'd imagine yourself as your favorite native animal: it doesn't matter if you pick an insect or a white tail deer.

What does a native animal need to survive? We've established setbacks for towns, the lake, rural residences. But what's a proper setback for an animal's home? In the discovery process, I submitted a paper about a 5 mile setback for prairie grouse as a grassland bird. But what about native animals that have adapted to habitat that has changed because of farming practices and cohabitation with humans? I think we can all agree that native animals need access to abundant and high quality food and water. A native animal needs some kind of shelter from the extreme weather in Deuel County. This might be an underground home for an insect or a tree grove for a deer or turkey. But native animals rely on their keen senses to protect them from predators. Animals use their sense of smell, hearing and vibrations through the ground to warn them of dangers. Things like noise and shadow flicker that Invenergy measures as "annoyance" to humans becomes a threat to the survival of individual animals. Those individual animals might be able to adapt to their home remodel. But most likely, animals will try to move. But native animals are territorial. It could be that for every displaced animal, one of that species will die because of the project. In effect, this project could be the genocide of the animals within the project area.

Let's explore the threats to native species a little further. Diminishing habitat for native prairie species is a real concern for native species. The SD Grassland Planner distributed by the SD Grassland Coalition and the USDA Natural Resources Conservation Service tells us that North America has lost 2.6 million acres of grasslands since 2019; the World Wildlife Fund is quoted in the planner that only 53% of the Great Plains grasslands remain intact. Pete Bauman, SDSU Extension Natural Resources and Wildlife Field Specialist, shows us in the submitted map that 1 of every 5 acres of eastern SD land is unbroken native sod. In the image below, we can see how the Coteau hills are essentially the last remaining acres in eastern SD. The proposed Invenergy project will be place at the very southern edge of this remaining swath of unbroken prairie.



The proposed project will affect the survival of sensitive species. The regal fritillary butterfly is currently under consideration for threatened species designation. The public comment period closed in October 2024 and the final decision will be made within a year. The monarch is also under consideration for threatened species designation. The public comment period is currently open so the designation will be decided in approximately a year. Grasslands are important to both species because they require specific purple wildflowers for survival. Regals do not migrate but they are nomadic in the late summer. Monarchs do migrate so wind towers pose an additional risk to the species survival. Both species are common in grasslands of Deuel County.

I applaud Invenergy's decision to not place towers directly on grasslands. That's a great commitment. But I don't believe it's enough. Some of these towers (like tower 90) appear to be placed within feet of a grassland. The benefits grasslands provide to native species and soil health will be negated by a tower in such close proximity.

It is imperative to consider that the health of the soil in the project area is going to be worse at the end of the project than it is today. As my final point, I'm going to talk about the principles of soil health. As mentioned before, this is a cornerstone of my personal values and my management strategy. Because of the work by the NRCS, SD Soil Health Coalition, SD Grassland Coalition, conservation districts and other groups with ag interests, there's a movement of soil health advocates that stretches from local producers to the White House. For example, in 2024, SD

children were encouraged to measure the soil health and microbial activity of their yards and gardens by burying cloth for a few weeks. That statewide science experiment dubbed “Soil Your Undies” challenge is currently on display at the SD Ag Heritage Museum in Brookings.

There’s 5 principles of soil health: Soil Cover, Limited Disturbance, Living Roots, Diversity, Integrating Livestock. With these 5 principles, we add organic matter to the soil, we improve water infiltration, we improve water quality, we reduce erosion, and we improve wildlife habitat. When producers implement a goal of soil health, we also increase our productivity and profitability. Unfortunately, a wind project like what Invenergy has proposed impacts the important environmental work of non-participant land owners. Invenergy will create a large disturbance to the soil, the project will eliminate all soil cover, living roots, and diversity of plant life at the construction and decommissioning phases. Integrating livestock becomes burdensome and potentially dangerous to livestock, at all phases of the project. We’ve already examined the effects to wildlife habitat. But the damage to water infiltration, water quality, and erosion could have more than 30 years of consequences to the entire Deuel County ecosystem, but especially for land in the project area.

I believe that Invenergy’s proposed project is damaging to the society and environment of Deuel County. I would appreciate if members of the Public Utilities Commission reject this project for the reasons stated. This concludes my testimony.



Arla Hamann Poindexter

January 12, 2025