

Appendix C

Shadow Flicker Assessment: Plum Creek Wind Farm

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ReGenerate
RENEWABLE ENERGY CONSULTING

Shadow Flicker Assessment

PROJECT: PLUM CREEK (MN)

DATE: OCTOBER 28, 2019

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Revision History

| Issue | Date | Revision Purpose |
|-------|-----------|--|
| 1 | 27-Sep-19 | Original |
| 2 | 02-Oct-19 | Minor Revisions and Correction for Typos |
| 3 | 28-Oct-19 | Update to WTG Layouts |

1. Executive Summary

The Plum Creek Wind Farm in southwestern Minnesota has been studied for the impact of shadow flicker on surrounding residences. Modeling and topographic reviews were completed to determine potential results at receptor locations in and around the project.

The Project was reviewed for three different layout configurations:

- 74 Vestas V162-5.6 turbines at 125 m hub-height,
- 74 Vestas V150-5.6 turbines at 105 m hub-height and
- 110 GE-127-2.8 turbines at 89 m hub-height.

ReGenerate used WindPRO to model shadow flicker for 461 receptors. This model is likely to overestimate the shadow flicker experienced due to conservative assumptions.

The maximum value of shadow flicker at receptor locations is presented in the table below.

| Layout | Participating | | Non-Participating | |
|----------------|---------------|-----------|-------------------|-----------|
| | 0 – 30 hr/yr | 30+ hr/yr | 0 – 30 hr/yr | 30+ hr/yr |
| V162-5.6 h125 | 124 | 19 | 318 | 0 |
| V150-5.6 h105 | 117 | 26 | 318 | 0 |
| GE-127-2.8 h89 | 135 | 8 | 318 | 0 |

The maximum value of shadow flicker for any layout was found to be 28.1 hr/yr for non-participating receptors while the maximum value for all receptors was found to be 114.8 hr/yr.

Appendix I shows the spatial mapping for shadow flicker results. Appendix II shows turbine coordinates provided for the Plum Creek Wind Farm. Appendix III shows the results at each receptor analyzed for this study.

2. Introduction

The Plum Creek Wind Farm (Project) is being developed by Geronimo Energy (Geronimo) in southwestern Minnesota. Merjent (on behalf of Geronimo) has retained ReGenerate Consulting (ReGenerate) to carry out an independent analysis of the shadow flicker effects caused by the proposed Project.

The Project was reviewed for three different layout configurations, these being:

- 74 Vestas V162-5.6 turbines at 125 m hub-height;
- 74 Vestas V150-5.6 turbines at 105 m hub-height; and
- 110 GE-127-2.8 turbines at 89 m hub-height.

These layouts were provided by Geronimo and dated 24-Oct-19. These turbines can cause shadow flicker throughout the Project area and this effect was studied at sensitive locations (receptors) to quantify the impact before the proposed Project is constructed. The impact was calculated for 461 receptors, 143 of which are participating receptors and 318 are non-participating.

The objective of this assessment is to predict the shadow flicker levels generated by the project at all receptors within or near the project area and in accordance with any applicable regulations as described in further detail later in the report. This report describes the Project site, shadow flicker methodology and results of the analysis.

3. Background

The cumulative effects of turbine generated shadow flicker throughout the Project area were studied to determine the impact on sensitive receptors. This effect occurs when wind turbine blades cast a moving shadow across the ground and nearby structures; this is perceived as a flickering effect due to the constant rotation of the blades. Flicker occurs when the following conditions are met: turbine is operating, sun is shining with insignificant cloud cover, turbine blades are positioned directly between the sun and receptor, and the receptor is close enough to distinguish the shadow created.

ReGenerate used the WindPRO software to model shadow flicker for this project. [1] Calculation of potential shadow impact is carried out by simulating the position of the sun relative to the turbine rotor swept area with the resulting shadow calculated in steps of 1 minute throughout a complete year. If the shadow at any time casts a shadow reflection on the window defined for the receptor, this step will be registered as 1 minute of potential shadow impact. Information required in this calculation includes: position of wind turbines, turbine hub height and rotor diameter, position of receptor, terrain elevation, window information (height, size, azimuth and tilt), time zone and daylight saving time information and simulation model which holds information about the earth's orbit and rotation relative to the sun. A diagram of this simulation is presented in Figure 1 below.

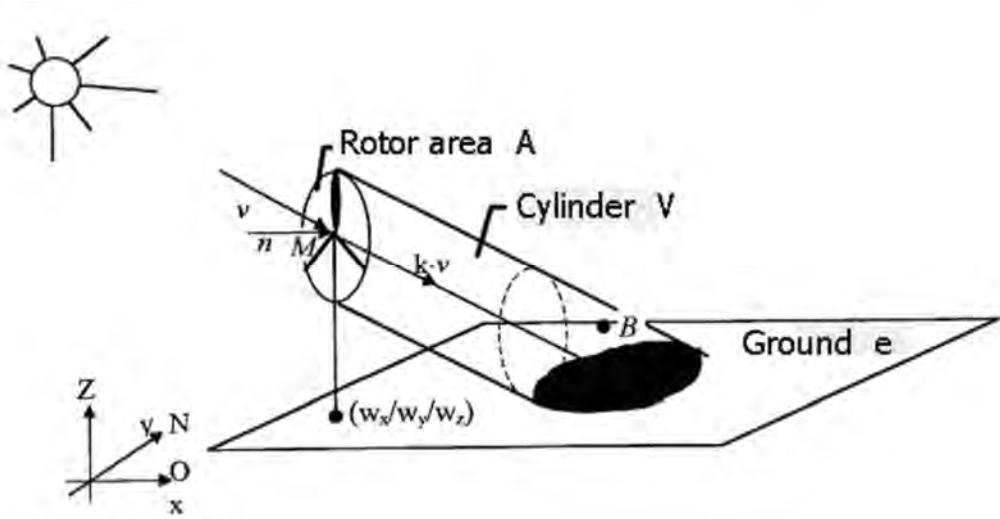


Figure 1: Diagram of Shadow Flicker Model Simulation [1]

This simulation will provide worst case results, to determine a more realistic scenario the wind direction and cloud cover may be incorporated. In the absence of wind direction data, the model will assume that the rotor swept area is always perpendicular to the sun. Wind direction data are generally gathered from on-site meteorological mast measurements or a nearby reference data set. Measured monthly sunshine data from local data sources may also be incorporated in order to account for cloud cover and visibility at times when the solar disk is not prominent enough perceive shadow flicker.

Available scientific evidence suggests that shadow flicker impact from wind turbines is unlikely to affect human health. [2] It can however be considered a nuisance for homeowners near wind turbines, especially those that frequently experience shadow flicker.

4. Project Details

The Project is located near Tracy, Minnesota in agricultural land consisting mostly of rolling hills. There are scattered dwellings, farm buildings and trees throughout the project area.

Geronimo provided ReGenerate with the coordinates of turbines and receptors for the Project. The layouts feature 74 Vestas V162-5.6 turbines at 125 m hub-height, 74 Vestas V150-5.6 turbines at 105 m hub-height or 110 GE-127-2.8 turbines at 89 m hub-height. Both Vestas layouts share the same turbine coordinates. The coordinates provided for turbines are shown in Appendix II; coordinates for receptors can be found in Appendix III.

No information on neighboring projects was provided. A cursory review by ReGenerate did not indicate any operating wind farms with the immediate project area that would have an impact on the shadow flicker results.

5. Project Regulations

Geronimo has identified an internal design standard limiting non-participating receptors to 30 hours per year of shadow flicker. [3] There are no known state or local regulations establishing a shadow flicker limit.

6. Modeling Procedures

ReGenerate used the WindPRO software to model shadow flicker. [1] Modeling assumptions for the shadow flicker analysis include:

- Turbine is operating 100% of the time;
- Flicker is modeled out to ten times the rotor diameter from each respective turbine;
- Flicker is ignored if sun is less than 3° above horizon;
- Default observer eye level is 1.5 m;
- Receptors are perpendicular to all turbines, also known as greenhouse mode;
- Monthly sunshine probability has been modeled from nearest meteorological station;
- Data source for monthly sunshine hours was from the Minneapolis-St. Paul, MN location of usclimatedata.com with data from 1981 – 2010 annual climate normals;
- Turbine orientation is taken into account; and
- Obstacles (like trees or buildings) are not taken into account.

ReGenerate studied nearby meteorological reference stations available from usclimatedata.com (USCD) historical norms and from the Global Historical Climatology Network (GHCN) for this analysis; see Table 1, below. [4,5]

| Station | State | Average Sunshine [hr/day] | Distance from Project [km] |
|----------------------|-------|---------------------------|----------------------------|
| Minneapolis-St. Paul | MN | 7.1 | 233 |
| Sioux Falls | SD | 7.0 | 75 |
| Des Moines | IA | 7.3 | 335 |

Table 1: Meteorological reference stations

Though the closest station, the Sioux Falls station exhibited numerous days of erroneous data and was therefore excluded from the analysis. Based on the proximity and more similar latitude, the Minneapolis-St. Paul meteorological station was chosen as most representative. Monthly average sunshine hours per month for the Minneapolis-St. Paul station are shown in Table 2 below:

| Minneapolis-St. Paul Average Sunshine [hr/month] | | | | | | | | | | | |
|--|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|
| Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sep | Oct | Nov | Dec |
| 140 | 166 | 200 | 231 | 272 | 302 | 343 | 296 | 237 | 193 | 115 | 112 |

Table 2: Average sunshine hours per month

The wind direction frequency was considered to account for turbine orientation of the rotor area relative to the sun. This data was provided by Geronimo from the 1801 on-site met mast from the Project. The wind frequency rose is shown below as Figure 2.

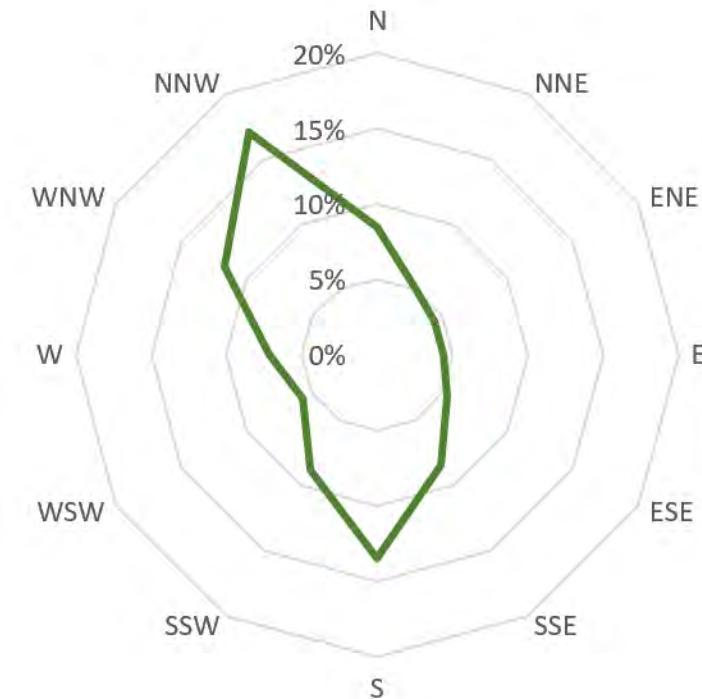


Figure 2: Wind Frequency Rose for Plum Creek Project

This model is still likely to produce estimates higher than those which will actually be experienced. Factors that will lower the impact, but not modeled include:

- Availability of the turbines;
- Turbines not operating below cut-in and above cut-out;
- Obstacles (like trees or buildings) obstructing shadow flicker; and
- Dust or aerosols in the air which reduce the impact of shadow flicker.

The methodology implemented as part of these models is realistic enough to be recommended for turbine siting purposes by ReGenerate Consulting.

7. Modeling Results

The effect on receptors has been quantified using the methodology described above and the maximum value of shadow flicker was found to be 28.1 hr/yr for non-participating receptors while the maximum value for all receptors was found to be 114.8 hr/yr . A summary of the results can be seen below in Table 3 - Table 6; detailed results can be found in Appendix III.

8. Conclusions

The maximum value of shadow flicker was found to be 28.1 hr/yr for non-participating receptors, this is below the limit of 30 hr/yr at all non-participating receptors. The maximum value for all receptors was found to be 114.8 hr/yr

9. References

- [1] EMD International A/S. (Apr 2019). WindPRO 3.3 User Manual – 6 Environment. Retrieved from http://help.emd.dk/WindPRO/content/windPRO3.3/c6-UK_WindPRO3.3-Environment.pdf.
- [2] Knopper, Loren D et al. "Wind turbines and human health." *Frontiers in public health* vol. 2 63. 19 Jun. 2014, doi:10.3389/fpubh.2014.00063.
- [3] Phone call with Brie Anderson, Chris Nuckols and Ryan McDevitt. 07-Aug-2019.
- [4] U.S. Climate Data. (2018). Climate Minneapolis – Minnesota. Retrieved from <https://www.usclimatedata.com/climate/minneapolis/minnesota/united-states/usmn0503>.
- [5] National Oceanic and Atmospheric Administration. (May 2018). Global Histroical Climatology Network (GHCN). Retrieved from <https://www.ncdc.noaa.gov/data-access/land-based-station-data/land-based-datasets/global-historical-climatology-network-ghcn>.

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Appendix I – Maps

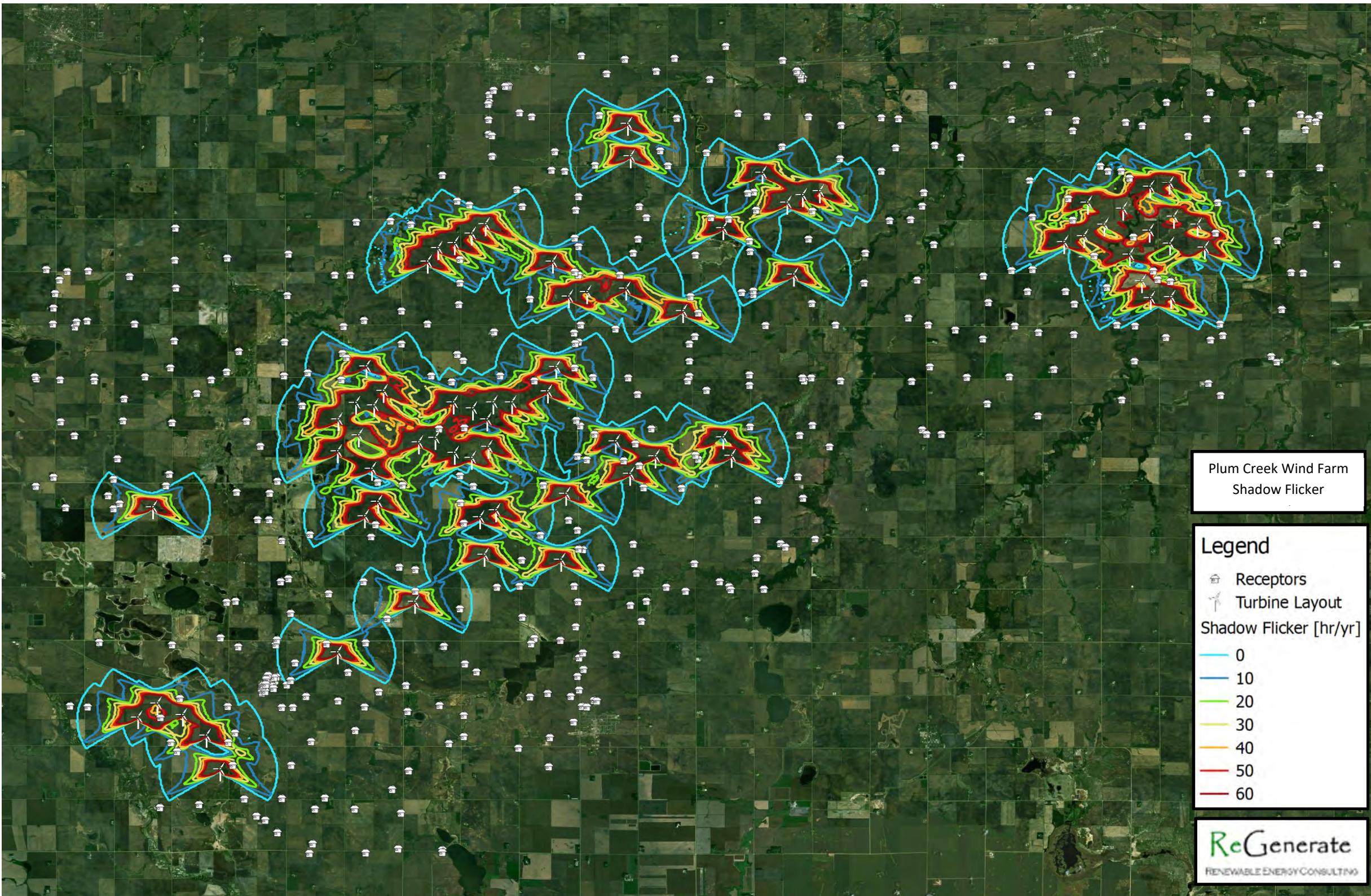


Figure 3: Shadow Flicker Map of Plum Creek Wind Project – V162-5.6 h125

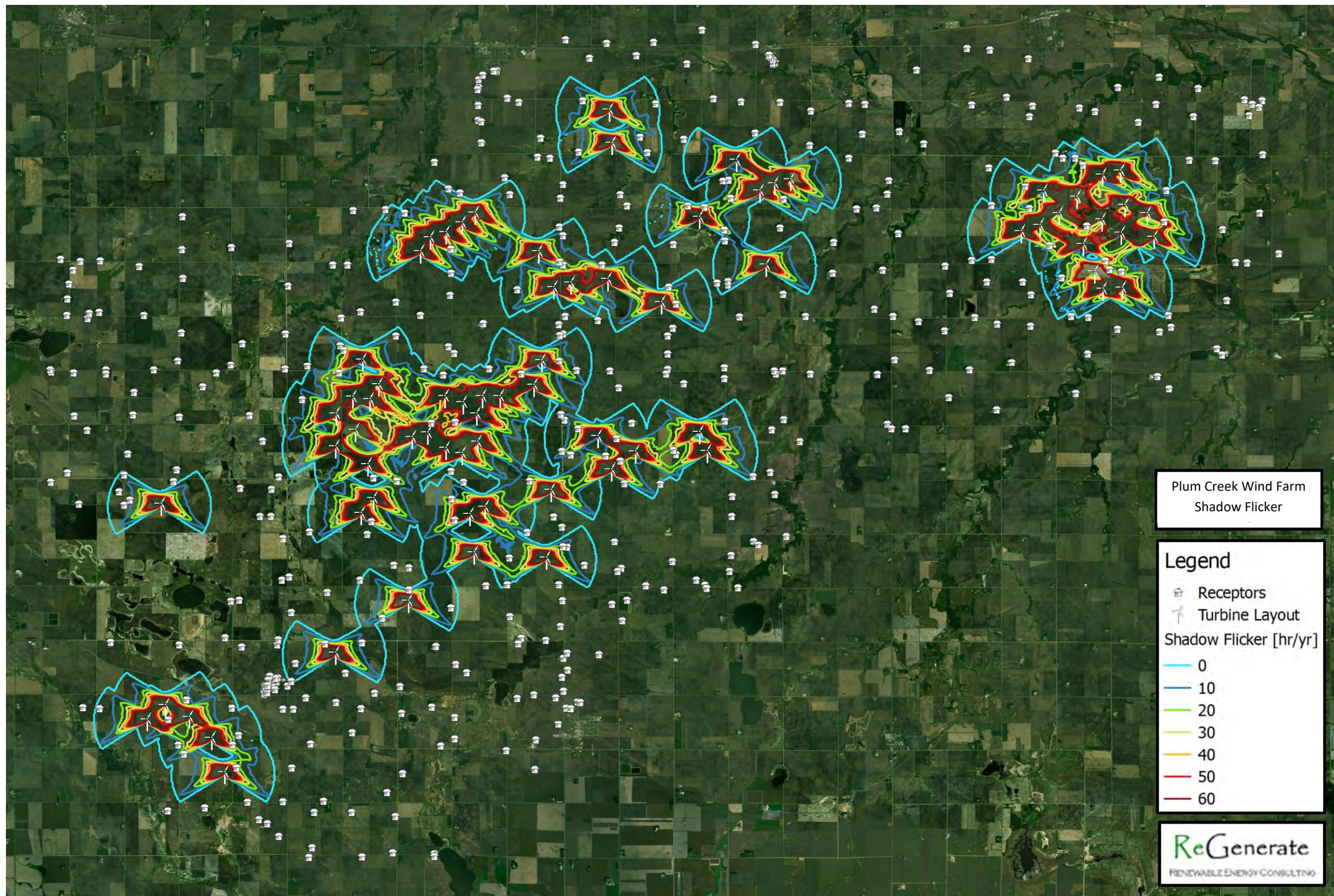


Figure 4: Shadow Flicker Map of Plum Creek Wind Project – V150-5.6 h105

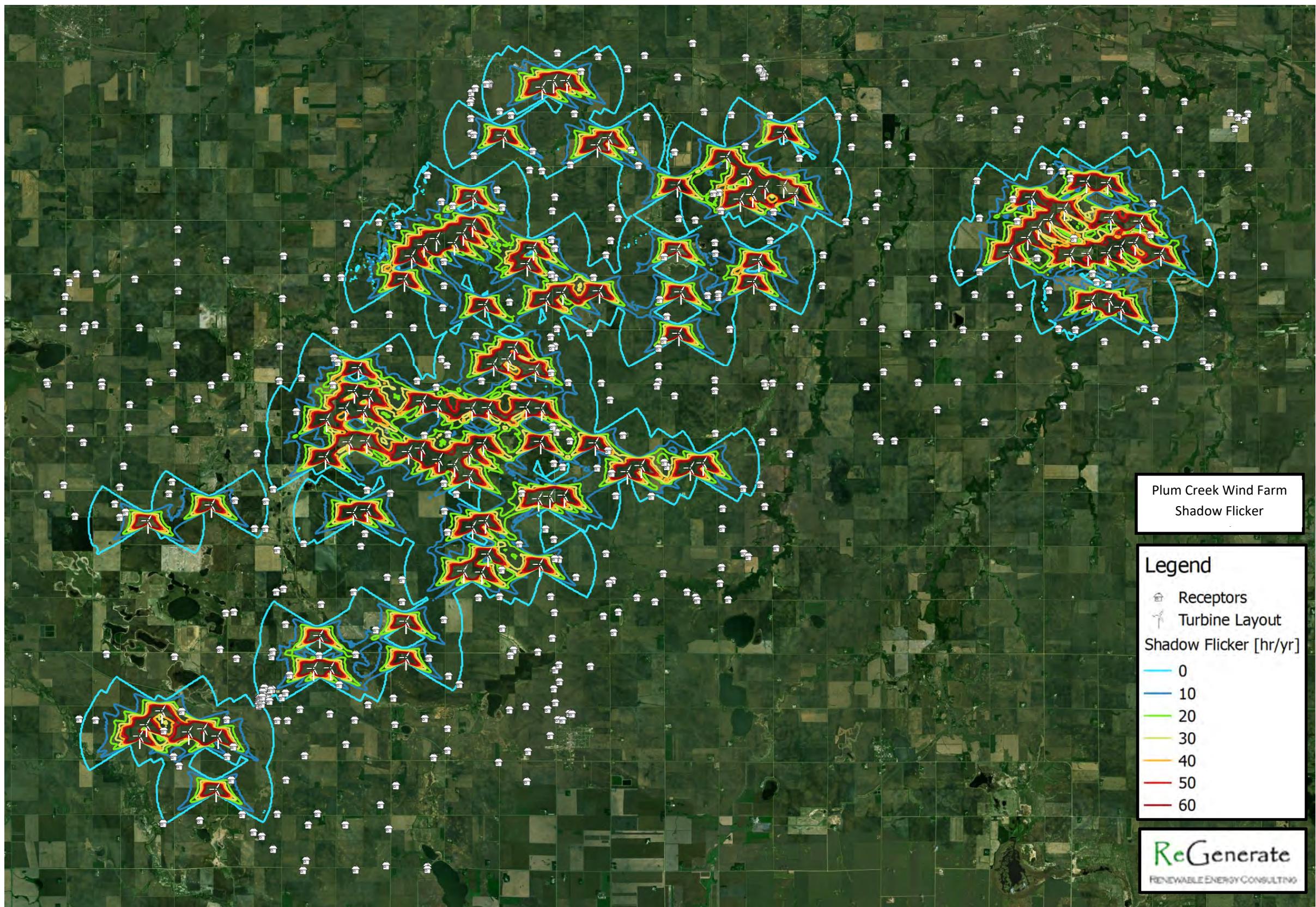


Figure 5: Shadow Flicker Map of Plum Creek Wind Project – GE-127-2.8 h89

| Receptor ID | X [m] | Y [m] | Status | V162-5.6 h125 | V150-5.6 h105 | GE-127 2.8 h89 |
|-------------|--------|---------|-------------------|---------------|---------------|----------------|
| R_276 | 296466 | 4883131 | Non-Participating | 0 | 0 | 3.9 |
| R_277 | 296541 | 4881622 | Non-Participating | 6.2 | 4.5 | 12.4 |
| R_278 | 296290 | 4880956 | Non-Participating | 0 | 0 | 2.7 |
| R_279 | 296398 | 4881086 | Non-Participating | 2.6 | 2.1 | 3.5 |
| R_280 | 295886 | 4881211 | Non-Participating | 0 | 0 | 2.2 |
| R_281 | 296003 | 4881212 | Non-Participating | 0 | 0 | 3.7 |
| R_282 | 296810 | 4880595 | Non-Participating | 0 | 0 | 0 |
| R_283 | 296427 | 4880265 | Participating | 0 | 0 | 0 |
| R_284 | 296130 | 4880273 | Participating | 0 | 0 | 0 |
| R_285 | 297701 | 4880422 | Participating | 0 | 0 | 0 |
| R_286 | 297993 | 4881280 | Participating | 0 | 0 | 16.7 |
| R_287 | 297432 | 4882178 | Participating | 45.3 | 34.8 | 0 |
| R_288 | 298520 | 4882167 | Non-Participating | 9.9 | 8.2 | 15.6 |
| R_289 | 298829 | 4880667 | Non-Participating | 0 | 0 | 0 |
| R_290 | 298426 | 4880214 | Non-Participating | 0 | 0 | 0 |
| R_291 | 298767 | 4885402 | Participating | 0 | 0 | 0 |
| R_292 | 298902 | 4885776 | Participating | 36.8 | 44.1 | 0 |
| R_293 | 299001 | 4887076 | Participating | 0 | 0 | 0 |
| R_294 | 299590 | 4895047 | Non-Participating | 6.1 | 0 | 1.9 |
| R_295 | 298643 | 4895038 | Non-Participating | 0 | 0 | 0 |
| R_296 | 295420 | 4889048 | Non-Participating | 0 | 0 | 0 |
| R_297 | 295783 | 4888265 | Non-Participating | 0 | 0 | 0 |
| R_298 | 295629 | 4886034 | Non-Participating | 0 | 0 | 4.3 |
| R_299 | 296019 | 4882191 | Participating | 0 | 0 | 4.1 |
| R_300 | 296054 | 4882340 | Non-Participating | 0 | 0 | 4.0 |
| R_301 | 300511 | 4880208 | Non-Participating | 0 | 0 | 0 |
| R_302 | 301172 | 4879873 | Non-Participating | 0 | 0 | 0 |
| R_303 | 301158 | 4879218 | Non-Participating | 0 | 0 | 0 |
| R_304 | 302662 | 4878821 | Non-Participating | 0 | 0 | 0 |
| R_305 | 303544 | 4879111 | Non-Participating | 0 | 0 | 0 |
| R_306 | 303028 | 4880384 | Non-Participating | 0 | 0 | 0 |
| R_307 | 303524 | 4880479 | Non-Participating | 0 | 0 | 0 |
| R_308 | 304152 | 4880363 | Non-Participating | 0 | 0 | 0 |
| R_309 | 304392 | 4880555 | Non-Participating | 0 | 0 | 0 |
| R_310 | 304365 | 4880978 | Non-Participating | 0 | 0 | 0 |
| R_311 | 304540 | 4881184 | Non-Participating | 0 | 0 | 0 |
| R_312 | 304801 | 4880223 | Non-Participating | 0 | 0 | 0 |
| R_313 | 304893 | 4880211 | Non-Participating | 0 | 0 | 0 |
| R_314 | 304875 | 4880203 | Non-Participating | 0 | 0 | 0 |
| R_315 | 304458 | 4880046 | Non-Participating | 0 | 0 | 0 |

| Receptor ID | X [m] | Y [m] | Status | V162-5.6 h125 | V150-5.6 h105 | GE-127 2.8 h89 |
|-------------|--------|---------|-------------------|---------------|---------------|----------------|
| R_316 | 304595 | 4880027 | Non-Participating | 0 | 0 | 0 |
| R_317 | 304215 | 4879572 | Non-Participating | 0 | 0 | 0 |
| R_318 | 303476 | 4878235 | Non-Participating | 0 | 0 | 0 |
| R_319 | 320154 | 4893962 | Participating | 114.8 | 100.7 | 25.5 |
| R_320 | 320681 | 4892907 | Participating | 43.9 | 30.1 | 0.9 |
| R_321 | 320794 | 4892643 | Participating | 29.4 | 25.7 | 0 |
| R_322 | 321147 | 4892580 | Participating | 24.4 | 19.0 | 2.6 |
| R_323 | 319375 | 4892433 | Non-Participating | 16.0 | 12.4 | 2.5 |
| R_324 | 319627 | 4891295 | Non-Participating | 0 | 0 | 3.7 |
| R_325 | 320122 | 4891247 | Participating | 0 | 0 | 2.5 |
| R_326 | 320971 | 4890880 | Non-Participating | 0 | 0 | 0 |
| R_327 | 320080 | 4890163 | Non-Participating | 0 | 0 | 0 |
| R_328 | 319697 | 4888987 | Non-Participating | 0 | 0 | 0 |
| R_329 | 317368 | 4888570 | Non-Participating | 0 | 0 | 0 |
| R_330 | 301074 | 4896416 | Participating | 0 | 0 | 1.9 |
| R_331 | 296734 | 4894119 | Non-Participating | 0 | 0 | 0 |
| R_332 | 295033 | 4894051 | Non-Participating | 0 | 0 | 0 |
| R_333 | 293638 | 4895016 | Non-Participating | 0 | 0 | 0 |
| R_334 | 293591 | 4894038 | Non-Participating | 0 | 0 | 0 |
| R_335 | 292315 | 4893575 | Non-Participating | 0 | 0 | 0 |
| R_336 | 291174 | 4893786 | Non-Participating | 0 | 0 | 0 |
| R_337 | 290378 | 4893537 | Non-Participating | 0 | 0 | 0 |
| R_338 | 290231 | 4893127 | Non-Participating | 0 | 0 | 0 |
| R_339 | 290602 | 4893783 | Non-Participating | 0 | 0 | 0 |
| R_340 | 290017 | 4893869 | Non-Participating | 0 | 0 | 0 |
| R_341 | 290179 | 4892686 | Non-Participating | 0 | 0 | 0 |
| R_342 | 290153 | 4892196 | Non-Participating | 0 | 0 | 0 |
| R_343 | 290761 | 4892086 | Non-Participating | 0 | 0 | 0 |
| R_344 | 291091 | 4892258 | Non-Participating | 0 | 0 | 0 |
| R_345 | 290810 | 4892239 | Non-Participating | 0 | 0 | 0 |
| R_346 | 292400 | 4892119 | Non-Participating | 0 | 0 | 0 |
| R_347 | 293591 | 4893187 | Non-Participating | 0 | 0 | 0 |
| R_348 | 295273 | 4891191 | Non-Participating | 0 | 0 | 0 |
| R_349 | 293490 | 4891579 | Non-Participating | 0 | 0 | 0 |
| R_350 | 294914 | 4890560 | Non-Participating | 0 | 0 | 0 |
| R_351 | 294475 | 4890336 | Non-Participating | 0 | 0 | 0 |
| R_352 | 293355 | 4890737 | Non-Participating | 0 | 0 | 0 |
| R_353 | 292641 | 4890487 | Non-Participating | 0 | 0 | 0 |
| R_354 | 291246 | 4890532 | Participating | 0 | 0 | 0 |
| R_355 | 291230 | 4890414 | Participating | 0 | 0 | 0 |

| Receptor ID | X [m] | Y [m] | Status | V162-5.6 h125 | V150-5.6 h105 | GE-127 2.8 h89 |
|-------------|--------|---------|-------------------|---------------|---------------|----------------|
| R_356 | 290290 | 4890466 | Non-Participating | 0 | 0 | 0 |
| R_357 | 289627 | 4890515 | Non-Participating | 0 | 0 | 0 |
| R_358 | 289608 | 4890582 | Non-Participating | 0 | 0 | 0 |
| R_359 | 290271 | 4889187 | Non-Participating | 0 | 0 | 0 |
| R_360 | 290011 | 4887500 | Non-Participating | 0 | 0 | 0 |
| R_361 | 289512 | 4887252 | Non-Participating | 0 | 0 | 0 |
| R_362 | 290315 | 4886569 | Non-Participating | 0 | 0 | 0 |
| R_363 | 291648 | 4886488 | Non-Participating | 7.2 | 5.5 | 6.4 |
| R_364 | 291825 | 4886638 | Participating | 10.1 | 8.0 | 11.4 |
| R_365 | 291503 | 4886894 | Non-Participating | 5.2 | 4.0 | 4.5 |
| R_366 | 291675 | 4887391 | Non-Participating | 5.4 | 3.2 | 0 |
| R_367 | 291799 | 4888012 | Non-Participating | 0 | 0 | 0 |
| R_368 | 291990 | 4889164 | Non-Participating | 0 | 0 | 0 |
| R_369 | 290632 | 4888748 | Non-Participating | 0 | 0 | 0 |
| R_370 | 292052 | 4889840 | Non-Participating | 0 | 0 | 0 |
| R_371 | 293353 | 4889057 | Participating | 0 | 0 | 0 |
| R_372 | 294068 | 4889931 | Non-Participating | 0 | 0 | 0 |
| R_373 | 293219 | 4887500 | Non-Participating | 0 | 0 | 3.0 |
| R_374 | 293120 | 4887152 | Participating | 0 | 0 | 2.0 |
| R_375 | 295080 | 4886893 | Non-Participating | 0 | 0 | 7.2 |
| R_376 | 294943 | 4883554 | Non-Participating | 0 | 0 | 0 |
| R_377 | 294689 | 4883523 | Non-Participating | 0 | 0 | 0 |
| R_378 | 294494 | 4882448 | Non-Participating | 0 | 0 | 0 |
| R_379 | 294981 | 4882162 | Non-Participating | 0 | 0 | 0 |
| R_380 | 295596 | 4880736 | Non-Participating | 0 | 0 | 1.3 |
| R_381 | 293146 | 4882280 | Non-Participating | 0 | 0 | 0 |
| R_382 | 291118 | 4882412 | Non-Participating | 0 | 0 | 0 |
| R_383 | 290244 | 4880506 | Non-Participating | 0 | 0 | 0 |
| R_384 | 290735 | 4880458 | Non-Participating | 4.2 | 3.2 | 3.9 |
| R_385 | 293170 | 4879002 | Participating | 21.2 | 18.5 | 4.9 |
| R_386 | 293020 | 4879293 | Non-Participating | 14.9 | 7.7 | 12.5 |
| R_387 | 292743 | 4880064 | Participating | 48.3 | 39.2 | 39.6 |
| R_388 | 293301 | 4880632 | Participating | 18.6 | 15.7 | 22.8 |
| R_389 | 294624 | 4880352 | Non-Participating | 4.0 | 3.2 | 9.6 |
| R_390 | 294798 | 4879518 | Participating | 15.8 | 8.8 | 42.0 |
| R_391 | 294604 | 4879244 | Participating | 35.3 | 28.1 | 7.4 |
| R_392 | 294704 | 4878550 | Participating | 36.8 | 33.4 | 17.6 |
| R_393 | 294996 | 4877510 | Participating | 0 | 0 | 0 |
| R_394 | 296046 | 4877497 | Non-Participating | 0 | 0 | 0 |
| R_395 | 296328 | 4878491 | Non-Participating | 0 | 0 | 0 |

| Receptor ID | X [m] | Y [m] | Status | V162-5.6 h125 | V150-5.6 h105 | GE-127 2.8 h89 |
|-------------|--------|---------|-------------------|---------------|---------------|----------------|
| R_436 | 295607 | 4880944 | Non-Participating | 0 | 0 | 0 |
| R_437 | 295649 | 4880980 | Non-Participating | 0 | 0 | 0 |
| R_438 | 295707 | 4880992 | Non-Participating | 0 | 0 | 2.0 |
| R_439 | 311154 | 4899063 | Non-Participating | 0 | 0 | 0 |
| R_440 | 311084 | 4899038 | Non-Participating | 0 | 0 | 0 |
| R_441 | 311085 | 4899067 | Non-Participating | 0 | 0 | 0 |
| R_442 | 311094 | 4899148 | Non-Participating | 0 | 0 | 0 |
| R_443 | 311086 | 4899178 | Non-Participating | 0 | 0 | 0 |
| R_444 | 311028 | 4899235 | Non-Participating | 0 | 0 | 0 |
| R_445 | 310969 | 4899266 | Non-Participating | 0 | 0 | 0 |
| R_446 | 310982 | 4899306 | Non-Participating | 0 | 0 | 0 |
| R_447 | 310603 | 4899627 | Non-Participating | 0 | 0 | 0 |
| R_448 | 309031 | 4900100 | Non-Participating | 0 | 0 | 0 |
| R_449 | 322551 | 4890896 | Non-Participating | 0 | 0 | 0 |
| R_450 | 322478 | 4891236 | Non-Participating | 8.5 | 0 | 11.7 |
| R_451 | 322205 | 4890762 | Non-Participating | 0 | 0 | 0 |
| R_452 | 324146 | 4893748 | Non-Participating | 0 | 0 | 1.1 |
| R_453 | 325243 | 4894199 | Non-Participating | 0 | 0 | 0 |
| R_454 | 324499 | 4892766 | Non-Participating | 0 | 0 | 0 |
| R_455 | 324832 | 4892729 | Non-Participating | 0 | 0 | 0 |
| R_456 | 325775 | 4892983 | Non-Participating | 0 | 0 | 0 |
| R_457 | 324215 | 4891646 | Non-Participating | 0 | 0 | 0 |
| R_458 | 322116 | 4889430 | Non-Participating | 0 | 0 | 0 |
| R_459 | 323874 | 4890208 | Non-Participating | 0 | 0 | 0 |
| R_460 | 324031 | 4890035 | Non-Participating | 0 | 0 | 0 |
| R_461 | 322437 | 4889055 | Non-Participating | 0 | 0 | 0 |