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**SOUTH DAKOTA PUBLIC  
UTILITIES COMMISSION**

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MARGO D. NORTHRUP, Associate

May 12, 2006

Patty VanGerpen  
South Dakota Public Utilities Commission  
500 East Capitol Avenue  
Pierre, South Dakota 57501

Re: Docket EL06-011  
In the Matter of the Petition for Designation of Montana-Dakota Utilities Co. as  
Electric Service Provider for the New North Central Farmers Elevator Location  
in Bowdle, South Dakota, as a Large Load Customer

Dear Patty,

Enclosed please find the original and ten (10) copies of the Petition of SDREA to  
Intervene for filing.

Thank you.

Sincerely yours,

RITER, ROGERS, WATTIER & BROWN, LLP

By: *Margo D Northrup*

Margo D. Northrup

MDN/rar  
Enclosures

cc: Sara B. Greff  
David A. Gerdes  
Carlyle E. Richards  
Darla Pollman Rogers

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA

<p>IN THE MATTER OF THE PETITION FOR DESIGNATION OF MONTANA-DAKOTA UTILITIES CO. AS ELECTRIC SERVICE PROVIDER FOR THE NEW NORTH CENTRAL FARMERS ELEVATOR LOCATION IN BOWDLE, SOUTH DAKOTA, AS A LARGE LOAD CUSTOMER.</p>	<p>DOCKET NUMBER EL06-011</p> <p>PETITION OF SDREA TO INTERVENE</p>
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Pursuant to ARSD 20:10:01:15.02, South Dakota Rural Electric Association ("SDREA") by its undersigned counsel petitions the Commission as follows:

1. SDREA is an organization comprised of member electric cooperatives in South Dakota. SDREA is devoted to the protection of the interests of its member electric cooperatives and their customers.
2. Montana Dakota Utilities ("MDU") has filed a Petition with this Commission (EL06-011) requesting that the Commission enter an Order allowing MDU to provide electric services to North Central Farmers Elevator's facility located near Bowdle, SD, which is within the assigned service territory of FEM Electric. MDU's petition was filed pursuant to SDCL § 49-34A-56, which is the large load statute.
3. SDREA believes that the issues presented in MDU's Petition with regard to SDCL § 49-34A-56 directly affect all of its member companies, and their consumers. SDREA asserts application by the Commission of SDCL 49-34A-56 in the manner requested by MDU in this docket would result in an erosion of South Dakota's territorial

laws, which would be detrimental to member companies and to the consumers of South Dakota.

4. SDREA recognizes this is a late filed petition for intervention. However, nothing of substance has occurred in this docket. The initial filing was made, two other parties have filed Petitions to intervene but the case has not yet appeared on a Commission agenda for action on the two previously filed intervention petitions. The issues presented in this docket and SDREA's proposed intervention constitutes a matter of public interest, especially to future large load customers. Thus, denial of this Petition would be detrimental to the public interest and is likely to result in a miscarriage of justice.

WHEREFORE, SDREA prays that the Commission permit its intervention and participation in this proceeding to examine and cross-examine witnesses, conduct discovery and offer evidence on its own behalf.

Dated this twelfth day of May, 2006

Riter, Rogers, Wattier & Brown, LLP

By: Margo D Northrup  
Margo D. Northrup  
Attorney for SDREA  
P. O. Box 280  
Pierre, South Dakota 57501  
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the PETITION OF SDREA TO INTERVENE was served via the method(s) indicated below, addressed to:

Sara B. Greff (X) First Class Mail  
South Dakota Public Utilities Commission ( ) Hand Delivery  
500 East Capitol Avenue ( ) Facsimile  
Pierre, South Dakota 57501 ( ) Overnight Delivery  
( ) E-Mail  
( ) Electronic Delivery

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( ) Electronic Delivery

Dated this 12 day of May, 2006.

  
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