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SOUTH DAKOTA PUBLIC  
UTILITIES COMMISSION

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April 28, 2006

Patricia Van Gerpen  
Executive Director  
Public Utilities Commission  
500 East Capitol Avenue  
Pierre, SD 57501

Re: Montana-Dakota Utilities Company; North Central Large  
Load Petition, Bowdle, South Dakota

Dear Ms. Van Gerpen:

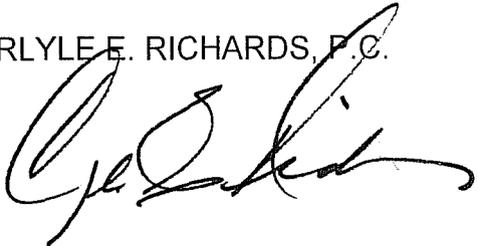
I represent North Central Farmers Elevator, Ipswich, South Dakota, owner of grain handling facilities being constructed at Bowdle.

I just today found out about the petition Montana-Dakota Utilities has filed in an attempt to be designated as supplier for North Central's new facility at Bowdle.

Therefore, I have prepared, signed and now enclose original and ten copies of my client's Petition to Intervene. I am also today mailing copies of the same and this letter to Dave Gerdes, attorney for Montana-Dakota Utilities and Darla Pollman Rogers, attorney for FEM Electric.

Very truly yours,

CARLYLE E. RICHARDS, P.C.

By 

CER/jea  
Enclosures  
pc: David A. Gerdes  
Darla Pollman Rogers  
Keith Hainy

MAY 01 2006

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

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.

Docket Number EL06-011

PETITION TO INTERVENE OF  
NORTH CENTRAL  
FARMERS ELEVATOR

North Central Farmers Elevator ("North Central") hereby petitions the Commission for permission to intervene as a party in this matter pursuant to ARSD 20:10:01:15.02, and objects to the Petition of Montana Dakota Utilities ("Montana-Dakota") to be designated as the electric supplier for its new grain handling/multi-unit train loading facility ("North Central Facility"), which will be located near Bowdle, South Dakota. In support of its Petition, North Central states that it has an interest in this proceeding for the following reasons:

1. North Central asserts that it does not believe the Petition of Montana-Dakota has been properly filed pursuant to SDCL § 49-34A-56 because the load requirement of the North Central Facility is not a large load of more than two thousand kilowatts.

2. North Central further asserts that if the Commission does determine that this is a biddable project pursuant to SDCL § 49-34A-56, FEM is nonetheless the appropriate electric provider to serve this load. FEM meets the qualifications of SDCL § 49-34A-56(1) through (6), and it is North Central's preference for FEM to serve its load,

which is evidenced by the contract for services entered into between FEM and North Central dated April 13, 2006.

3. The ultimate ruling of the Commission within this docket will have a direct impact upon North Central, as it is the affected customer in this proceeding.

4. That a miscarriage of justice will result if the Petition of Montana Dakota is granted because such action would be contrary to the preference of North Central and therefore this Petition to Intervene should be granted even though filed one day late.

WHEREFORE, North Central requests that the Commission grant North Central's Petition and allow it to intervene and be granted party status in this proceeding.

DATED this twenty-eighth day of April, 2006.

A handwritten signature in black ink, appearing to read 'C. E. Richards', written over a horizontal line.

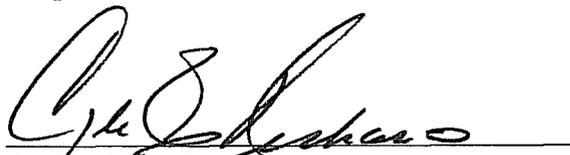
Carlyle E. Richards  
Richards & Oliver  
P. O. Box 114  
Aberdeen, South Dakota 57402

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Petition to Intervene was served via the method(s) indicated below, on the twenty-eighth day of April, 2006, addressed to:

South Dakota Public Utilities Commission 500 East Capitol Avenue Pierre, South Dakota 57501	<input checked="" type="checkbox"/> (X )	First Class Mail
	<input type="checkbox"/> ( )	Hand Delivery
	<input type="checkbox"/> ( )	Facsimile
	<input type="checkbox"/> ( )	Overnight Delivery
	<input type="checkbox"/> ( )	E-Mail
	<input type="checkbox"/> ( )	Electronic Delivery
David A. Gerdes May, Adam, Gerdes & Thompson 503 S. Pierre Street P. O. Box 160 Pierre, South Dakota 57501	<input checked="" type="checkbox"/> (X )	First Class Mail
	<input type="checkbox"/> ( )	Hand Delivery
	<input type="checkbox"/> ( )	Facsimile
	<input type="checkbox"/> ( )	Overnight Delivery
	<input type="checkbox"/> ( )	E-Mail
	<input type="checkbox"/> ( )	Electronic Delivery
Darla Pollman Rogers Riter, Rogers, Wattier & Brown, LLP P. O. Box 280 Pierre, South Dakota 57501	<input checked="" type="checkbox"/> (X )	First Class Mail
	<input type="checkbox"/> ( )	Hand Delivery
	<input type="checkbox"/> ( )	Facsimile
	<input type="checkbox"/> ( )	Overnight Delivery
	<input type="checkbox"/> ( )	E-Mail
	<input type="checkbox"/> ( )	Electronic Delivery

Dated this twenty-eighth day of April, 2006.

  
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Carlyle E. Richards  
Richards & Oliver  
P. O. Box 114  
Aberdeen, South Dakota 57402