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OCT 18 2006

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION **OF COUNSEL:**
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MARGO D. NORTHRUP, Associate

October 18, 2006

Patty Van Gerpen, Executive Director
South Dakota Public Utilities Commission
300 East Capitol
Pierre, SD 57501

Re: In the Matter of the Application by Navitas Energy, Inc., et al
Docket No. EL06-020 – Petition of Intervention on behalf of
Sioux Valley Energy – Our File No. 06-188

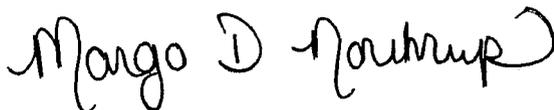
Dear Ms. Van Gerpen:

Enclosed for filing in the above-referenced matter, please find the original and one copy of Sioux Valley Energy's Petition for Intervention. Please file stamp the extra copy and return to our office.

By copy of this letter and pleading, same is being forwarded this date to all parties.

Thank you for your professional courtesies.

Sincerely yours,



Margo D. Northrup

MDN/mdb
Enclosures

cc: Paul Eberth, Gabriel Alonso, David Gerdes, Karen Cremer, Ryan Taylor

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OCT 18 2006

SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE APPLICATION BY NAVITAS ENERGY, INC. FOR AN ENERGY CONVERSION FACILITY PERMIT FOR THE CONSTRUCTION OF THE WHITE WIND FARM AND ASSOCIATED COLLECTION SUBSTATION AND ELECTRIC INTERCONNECTION SYSTEM

DOCKET NUMBER EL06-020

PETITION OF
SIOUX VALLEY ENERGY
TO INTERVENE

Pursuant to ARSD 20:10:01:15.02, Sioux Valley Southwestern Electric Cooperative, Inc., doing business as Sioux Valley Energy by its undersigned counsel petitions the Commission as follows:

1. Sioux Valley Energy is a rural electric cooperative located in Colman, South Dakota.
2. White Wind Farm, LLC ("White Wind") a wholly owned subsidiary of Navitas Energy, Inc. has filed an Application with this Commission (EL06-020) seeking an Energy Conversion Facility Permit to construct and operate the White Wind Farm.
3. The White Wind Farm is a proposed 200 MW wind energy electricity generating facility and ancillary services located on approximately 93 acres in Sherman Township, southeast of White, South Dakota in Brookings County. The project consists of up to 105 2 MW wind turbine generators, associated electric collector lines, a collection substation and interconnection and upgrades to the WAPA White Substation.
4. Sioux Valley Energy's interests in this docket include, but are not limited to, the following:

(a) The White Wind Farm is located in the service territory of Sioux Valley Energy.

(b) That the White Wind Farm be required to purchase station power from Sioux Valley Energy in whose territory the facility is located, consistent with South Dakota's Territorial Laws.

(c) That the purchasing entity may not use collector lines to deliver retail service, which should be provided by Sioux Valley Energy.

5. Sioux Valley Energy believes that the issues presented in the White Wind Application affect all of the consumers of Sioux Valley Energy. Sioux Valley Energy requests that the Commission examine the Application of White Wind in this docket in a manner that does not result in an erosion of South Dakota's territorial laws, which would be detrimental to Sioux Valley Energy.

6. Sioux Valley Energy recognizes this is a late filed Petition to Intervene. However, nothing of substance has occurred in this docket, and grant of this Petition will not delay the proceedings.

7. At the Commission meeting of September 26, 2006, wherein this Commission granted the Petition to Intervene filed by SDREA, the Commission questioned why Sioux Valley Energy had not filed a Petition to Intervene. While not objecting to the petition of SDREA, the attorney for White Wind Farm suggested that it would be appropriate for Sioux Valley Energy to be involved in any discussions and resolution of the issues raised in the SDREA Petition to Intervene.

8. Sioux Valley Energy shares the concerns and interests expressed by SDREA in its Petition to Intervene, but Sioux Valley Energy will be more directly affected by the White Wind Farm, and thus Sioux Valley Energy is a proper party to be involved in the proceedings in this docket.

9. The issues presented in this docket and Sioux Valley Energy's proposed intervention constitutes matters of public interest, especially to the preservation and integrity of the South Dakota Territorial Act. Thus, denial of this Petition would be detrimental to the public interest and is likely to result in a miscarriage of justice.

WHEREFORE, Sioux Valley Energy requests 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 18 day of October, 2006.

Riter, Rogers, Wattier & Brown, LLP

By: Margo D. Northrup
for Darla Pollman Rogers
P. O. Box 280
Pierre, South Dakota 57501
Telephone (605) 224-7889
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Attorney for Intervenor
Sioux Valley Energy

CERTIFICATE OF SERVICE

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

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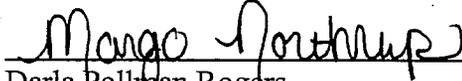
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Dated this 18 day of October, 2006.



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