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SEP 11 2006

SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

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September 11, 2006

Ms. Patty Van Gerpen
Public Utilities Commission
500 E. Capitol
Pierre, SD 57501

Re: In the Matter of the Application of
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
EL 06-020

Dear Patty:

Enclosed for filing in the above referenced docket is
original and ten copies of Petition of SDREA to Intervene.

Very truly yours,

RITER, ROGERS, WATTIER &
BROWN, LLP

By: *Margo D Northrup*

Margo D. Northrup

MDN-wb

Enclosures

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
SDREA TO INTERVENE

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. 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. SDREA's interests in this docket include, but are not limited to, the following:

- (a) That the White Wind Farm (and future similar facilities) be required to purchase station power from the electric service provider in whose territory the facility is located, consistent with South Dakota's Territorial Laws.
- (b) That the purchasing entity may not use collector lines to deliver retail service, which should be provided by the assigned electric provider.

5. SDREA believes that the issues presented in the White Wind Application directly affect all of its member companies, and their consumers. SDREA 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 member companies and to the consumers of South Dakota.

6. The site is located in the service territory of Sioux Valley Energy, a rural electric cooperative and a member company of SDREA.

7. The issues presented in this docket and SDREA's proposed intervention constitute 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, SDREA 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 11th day of September, 2006.

Riter, Rogers, Wattier & Brown, LLP

By: Margo D Northrup

Margo D. Northrup
Darla Pollman Rogers
Attorney for SDREA
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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:

Mr. Paul Eberth	<input checked="" type="checkbox"/>	First Class Mail
Senior Project Developer	<input type="checkbox"/>	Hand Delivery
Navitas Energy Inc.	<input type="checkbox"/>	Facsimile
3001 Broadway Street NE	<input type="checkbox"/>	Overnight Delivery
Minneapolis, MN 55413	<input type="checkbox"/>	E-Mail
<u>peberth@windpower.com</u>	<input type="checkbox"/>	Electronic Delivery
612-370-1061 – voice		
612-370-9005 – fax		

Mr. Gabriel Alonso	<input checked="" type="checkbox"/>	First Class Mail
Gamesa Energy USA	<input type="checkbox"/>	Hand Delivery
1 South Broad Street 20th Floor	<input type="checkbox"/>	Facsimile
Philadelphia, PA 19107	<input type="checkbox"/>	Overnight Delivery
<u>galonso@gamesaenergy.com</u>	<input type="checkbox"/>	E-Mail
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215-665-9811 - fax		

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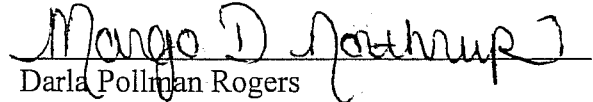
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Ryan J. Taylor
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Dated this 11th day of September, 2006.


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