

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

In the Matter of the Application
of Black Hills Power, Inc. for
Authority to Increase its Electric
Rates

Docket No. EL12-061

**PETITION TO INTERVENE
OF GCC DACOTAH, INC., PETE LIEN &
SONS, INC.; RUSHMORE FOREST
PRODUCTS, INC., SPEARFISH FOREST
PRODUCTS, INC., AND
RAPID CITY REGIONAL HOSPITAL**

GCC Dacotah, Inc.; Pete Lien & Sons, Inc.; Rapid City Regional Hospital, Inc.; Rushmore Forest Products, Inc.; and Spearfish Forest Products, Inc. (collectively “Black Hills Industrial Intervenors”); hereby petition for leave to intervene as parties in the above entitled matter.

GCC Dacotah, Inc. (“GCC”) is a cement producer located in Rapid City, South Dakota. Its parent company is Grupo Cementos de Chihuahua, S.A. de C.V, which is headquartered in Mexico. Grupo Cementos de Chihuahua produces cement, ready-mixed concrete, limestone aggregates, concrete block and gypsum, and has an important presence, through U.S. subsidiary companies, in seven states in the United States and in the state of Chihuahua in Mexico. GCC was formed on March 16, 2001, in order to acquire the South Dakota State Cement Plant facility located in Rapid City, South Dakota. GCC markets and sells cement in nine states and distributes its cement through a network of distribution terminals located in South Dakota, Wyoming, and Colorado.

Pete Lien & Sons, Inc. (“PLS”) began as a small rock quarry operation, located in the foothills of the Black Hills, near Rapid City, South Dakota. The company was founded by Pete Lien and his two sons, Chuck and Bruce, in 1944. While the company owed its early success to business generated by the nearby Rapid City Army Air Base and later to the building of the interstate highway system, it has grown through the careful acquisition of reserves and existing companies into a privately held corporation with holdings throughout an eight-state region. Through the 60-year history of the company, PLS’ core business has been mining, primarily limestone. The original quarry that Pete Lien bought from his supplier has been mined and reclaimed. The company has since purchased additional reserves and presently has active mines in northern Colorado, western South Dakota, and eastern Wyoming. The mined product supplies PLS’ lime and concrete plants, local road contractors, and local homeowners.

Rapid City Regional Hospital, Inc. (“RCRH”) is a not-for-profit, integrated, community-based health care system with more than 40 facilities serving South Dakota, Wyoming and Nebraska. These facilities include hospitals, specialty care centers, clinics, and senior care assistance operations. It is the region’s leading medical center, providing health care services to the 360,000 people who live in the Black Hills of South Dakota and the surrounding region, as well as thousands of visitors each year.

Rushmore Forest Products, Inc. (“Rushmore”) is located in Hill City, South Dakota. This is a Ponderosa Pine sawmill that produces lumber and other premium Ponderosa Pine building products. Rushmore is a subsidiary of Neiman Enterprises which acquired the Hill City mill in 1998.

Spearfish Forest Products, Inc. (“Spearfish”) is located in Spearfish, South Dakota. This company is also a subsidiary of Neiman Enterprises. This too is a Ponderosa Pine processing facility that includes a sawmill, drying kiln, and planer for manufacturing premium Ponderosa Pine building products. In addition, this facility also includes a renewable fuel manufacturing facility, a 45,000 ton per year wood pellet facility (with its product marketed as Heartland Pellets).

Each of the Black Hills Industrial Intervenors is a major industrial user of power produced and sold to them at retail by Black Hills Power, Inc. (“BHP”). Collectively, the Black

Hills Industrial Intervenors seek to intervene in this matter because the proposed phased-in rate increase of Black Hills Power, Inc.'s ("BHP"), will greatly increase the cost of doing business for each of these companies at a time when they are under considerable economic stress. Black Hills Industrial Intervenors believe their interests in this proceeding are unique and may well not be adequately addressed by other intervenors. Based on the current service list available on the South Dakota Public Utilities Commission's website, it is not apparent that there are any other customer parties to this case, and no other large industrial customers are parties. Black Hills Industrial Intervenors' participation in this matter will not disadvantage or burden any other party. Therefore, Black Hills Industrial Intervenors ask that their petition be granted.

This filing also constitutes a Notice of Appearance of Charles P. Schroyer and Mark Moreno of Schmidt, Schroyer, Moreno, Lee & Bachand P.C. of Pierre, South Dakota as well as of Andrew P. Moratzka and William J. O'Brien of the law firm of Mackall, Crouse & Moore, PLC in Minneapolis, Minnesota who will jointly act as the attorneys for Black Hills Industrial Intervenors in this proceeding.

Respectfully submitted,

/s/ Charles P. Schroyer

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