

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

**IN THE MATTER OF THE
COMPLAINT BY JUHL ENERGY, INC.
AGAINST NORTHWESTERN
CORPORATION DBA
NORTHWESTERN ENERGY FOR
ESTABLISHING A PURCHASE
POWER AGREEMENT**

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**STAFF'S FIRST SET OF DATA
REQUESTS TO JUHL ENERGY**

EL16-021

1-9) On page 12 of Roger Schiffman's direct testimony, he states that Juhl believes an LEO has been established. Provide support for that statement. Upon which date does Juhl contend the LEO was established?

ANSWER: With respect to the first question, Mr. Schiffman is not a lawyer and believes the question of LEO formation is a matter of law better addressed in legal arguments between the party, assuming there is disagreement. With respect to the second part of the question, Juhl believes the LEO should run from the date negotiations ended, which would be April 4, 2016.