

Griffith, Kylie

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**Subject:** FW: Fall River Matter

**From:** Bill Taylor [mailto:bill.taylor@taylorlawsd.com]  
**Sent:** Wednesday, November 28, 2018 3:27 PM  
**To:** Sabers, Cathy <Cathy.Sabers@blackhillscorp.com>  
**Cc:** Kristen Edwards <Kristen.Edwards@state.sd.us>  
**Subject:** Fall River Matter

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[REDACTED]

On the subject of the planned schedule, I would like you and Kristen to consider a variation to what we have discussed. Part of my expert's avoided cost calculation is based on estimates of what it will cost BH to construct and operate the 20 megawatt SD 1 solar facility. He used industry-wide costs because he is not privy to BH's estimated costs for construction and operation of the project. If there are discrepancies between his estimate and BH's acquisition costs and estimates of construction and operational costs, he may choose to adopt some or all of BH's numbers in his calculations, which would in turn affect his calculation of avoided costs and in turn affect his testimony. Rather than submit pre-filed testimony and subsequently withdraw or amend it, I think it makes more sense to do some preliminary discovery, then exchange expert reports, then depose our respective experts, then submit testimony. Obviously that will require shuffling the schedule, but not significantly. (If BH doesn't intend for the wind PPA to be part of the case, I can submit a preliminary report by the end of the week, subject to adjustments as noted above.) Advise your thoughts on that idea, please.

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