



MONTANA-DAKOTA

UTILITIES CO.

A Division of MDU Resources Group, Inc.

400 North Fourth Street
Bismarck, ND 58501
(701) 222-7900

May 18, 2009

Ms. Patricia Van Gerpen
Executive Director
South Dakota Public Utilities
Commission
State Capitol Building
500 East Capitol
Pierre, SD 57501

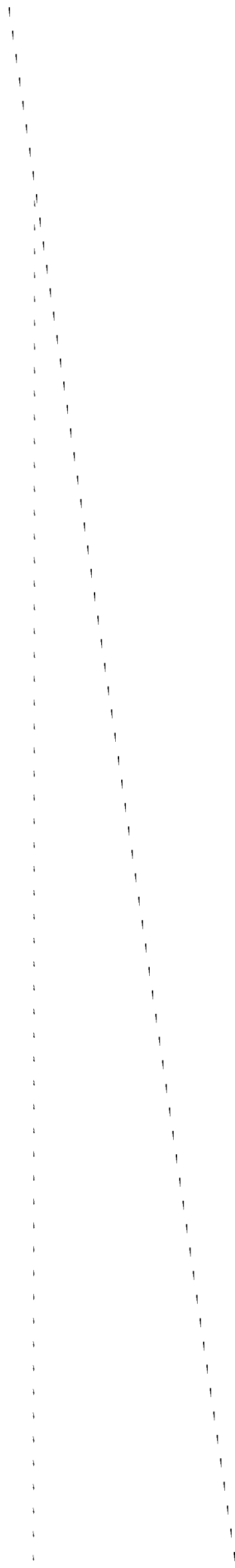
Re: Docket No. RM08-002
Interconnection Rulemaking

Dear Ms. Van Gerpen:

Montana-Dakota Utilities Co. (Montana-Dakota), a Division of MDU Resources Group Inc., herewith submits comments regarding the Commission’s Notice of Public Hearing to Adopt Rules (Notice) in the above referenced docket. Montana-Dakota was not available to participate in the Commission’s hearing held on May 6, 2009 but herewith submits its comments as allowed by the Notice.

Montana-Dakota offers the following comments for consideration prior to moving to the formal rulemaking process:

Proposed Rule	Suggested Change
20:10:36:01 – Scope and Applicability	Montana-Dakota suggests an additional clarifying phrase to address situations where generators of any size connecting to the transmission system of a utility such as Montana-Dakota that is a member of the Midwest Independent System Operator (MISO) will be subject to MISO’s interconnection requirements. This would be in lieu of the second sentence that refers to facilities greater than ten megawatts that may be subject to the commission’s interconnection jurisdiction.
20:10:36:03 (15) & (16) – Definitions	Add the phrase “as revised by IEEE” to avoid a rule change to reflect changes in



the standards adopted by IEEE throughout time.

20:10:36:15 – Isolation Device

A disconnect switch should be required for all generator interconnections, including tier 1, to ensure safety for utility operating personnel.

20:10:36:24 (2) – Interconnection Facilities Deposit

The requirement that the deposit may not exceed \$10,000 for small generators facilities proposing to interconnect two megawatts or less should be changed to an interconnection of 500 KW or less.

20:10:36:65 - Monitoring

Montana-Dakota suggests that the requirement for remote monitoring be changed from three megawatts to two megawatts. Montana-Dakota also recommends that anytime remote monitoring is deemed necessary, all costs should be the responsibility of the interconnecting customer.

Montana-Dakota again commends the efforts of the Commission Staff in the process leading to the formulation of the proposed rules but urges the Commission to consider the above comments in formulating its final rules.

Sincerely,



Donald R. Ball
Vice President – Regulatory Affairs

Cc: Dave Gerdes

