

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

December 17, 2010

Ms. Patricia Van Gerpen
Executive Director
South Dakota Public Utilities Commission
State Capitol Building
500 East Capitol
Pierre, SD 57501-5070

Re: In the Matter of the Adoption of
Rules Regarding Renewable,
Recycled, and Conserved Energy,
Docket No. RM09-002

Dear Ms. Van Gerpen:

Montana-Dakota Utilities Co. (Montana-Dakota), a Division of MDU Resources Group, Inc. has reviewed the draft rules in Section 20:10:38 of the South Dakota Public Utilities Commission's Administrative Rules transmitted on November 23, 2010.

Montana-Dakota appreciates the opportunity to comment on the proposed rules relating to Renewable, Recycled and Conserved Energy reporting requirements.

Montana-Dakota offers the following additional comments regarding the proposed rules for the Commission's consideration:

- Proposed Rule 20:10:38:03 Measurement and Verification of Energy Efficiency Measures – it is unclear what is intended by the addition of the requirement that an energy efficiency impact evaluation shall be performed at “appropriate periodic intervals”. Montana-Dakota suggests that the impact evaluation would be prescribed in each utility's specific conservation and demand side management plan as approved by the Commission and the above language should be removed from the proposed rule.
- Proposed Rule 20:10:38:06 Measurement and Verification of Demand Response Measures – as noted above it is unclear what is intended by the addition of the requirement that an energy efficiency impact evaluation shall be performed at “appropriate periodic intervals” and

suggests this language be removed from the proposed rule for the reason noted above.

- Proposed Rule 20:10:38:07 Annual Report Requirements - as suggested in its comments submitted on June 30, 2010 Montana-Dakota suggests the information required in subsections (8), (9), (10) and (11) of the proposed rule is currently part of the analyses required in the development of each individual utility's conservation and demand side management portfolios and should be a part of the applications filed with the Commission to implement such portfolios and not a part of the annual reporting requirements under proposed Section 20:10:38:07.

Montana-Dakota looks forward to working with the Commission and its Staff in developing rules that provide for the economical and efficient development and reporting of renewable energy resources and energy efficiency programs.

Sincerely,

/s/ Tamie A. Aberle

Tamie A. Aberle
Pricing & Tariff Manager