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April 5, 2021

Ms. Patricia Van Gerpen  
SD Public Utilities Commission  
500 E. Capitol Ave.  
Pierre, SD 57501

Re: RM19-001

Dear Ms. Van Gerpen:

South Dakota Rural Electric Association (“SDREA”) and Basin Electric Power Cooperative (“Basin Electric”) jointly submitted written comments in the above docket when it was opened in 2019. SDREA and Basin Electric appreciated the opportunity to participate in the hearing on March 24, 2021, and would offer the following additional comments to the “Updated Rules” filed in the docket on March 26, 2021.

1. **20:10:21:04.** With respect to the proposed change to strike “which are facilities where electricity is being generated” in the March 26<sup>th</sup> draft of this rule, Basin Electric urges the Commission to adopt the following language:

**20:10:21:04. Existing energy conversion facilities.** For existing energy conversion facilities ~~which are facilities where electricity is being generated~~, that are owned or operated by the utility *in the state to serve South Dakota load*, the utility shall provide information as follows;”

Basin Electric believes this language will ensure that the Commission receives the information it needs from utilities that own and operate energy conversion facilities in South Dakota while also avoiding any jurisdictional issues with power plants operated by the utility in other states.

2. **20:10:21)04(7).** Basin Electric would also like to reiterate the concerns raised in the June 28, 2019 comments with regard to the 10-year timeframe for providing decommissioning plans. It is generally not known 10 years out that a facility will be decommissioned and accordingly is too far out to provide detailed information that would be of value to the Commission. Basin Electric suggests that the time frame be shortened to two years, which is consistent with the statutory requirement contained in SDCL § 49-41B-3 to update the ten-year plan every two years:

Robert C. Riter, Jr  
A. Jason Rumpca

Darla Pollman Rogers  
Jerry L. Wattier of Counsel

Lindsey Riter-Rapp  
Kody R. Kyriss, Associate



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(7) Decommissioning plans for any facility expected by the facility owner to be retired in the next ~~ten~~ *two* years.

3. **20:10:37:10 Pipeline operator's incident reporting requirements.** Basin Electric supports the comments and suggested edits filed on March 23, 2021, by MidAmerican Energy, North Western Energy, and Montana Dakota Utilities with respect to this proposed rule.

4. **20:10:39:07 and 20:10:39:08.** SDREA agrees with reducing the hours for stray voltage training from 48 hours to 40 hours. SDREA also concurs with applying the same training standard to all professionals who conduct stray voltage testing.

Thank you for your consideration of these comments. Please do not hesitate to contact me if you have any questions.

Sincerely yours,

RITER ROGERS, LLP

By:

A handwritten signature in blue ink that reads 'Darla Pollman Rogers'. The signature is fluid and cursive.

Darla Pollman Rogers

Attorney for SDREA and Basin Electric

DPR-wb