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June 28, 2019

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

Re: RM19-001

Dear Ms. Van Gerpen:

At its May 2, 2019 meeting, the Commission requested Staff to open the above rule making docket. Thereafter, on May 23, 2019, Staff circulated draft amendments for rules included in the docket to interested parties. Staff invited written comments be submitted by June 28, 2019. South Dakota Rural Electric Association (“SDREA”) and Basin Electric Power Cooperative (“Basin Electric”) submit the following written comments in docket RM19-001.

1. Introduction

Basin Electric is a regional rural electric wholesale power supplier headquartered at 1717 East Interstate Avenue, Bismarck, North Dakota. The region served by Basin Electric and its 141 member cooperatives includes all or portions of nine states encompassing Montana, Wyoming, Colorado, North Dakota, South Dakota, Nebraska, Minnesota, Iowa, and New Mexico. Basin Electric owns and operates or otherwise jointly shares energy conversion and transmission facilities throughout this region and ultimately serves 3 million electric consumers.

SDREA is a voluntary membership association that serves 27 not-for-profit distribution cooperatives in South Dakota, one distribution cooperative in Minnesota, and three generation and transmission cooperatives. Basin Electric is a member of SDREA. Our member companies have carefully reviewed the draft rules in this docket and appreciate the opportunity to provide input.

2. Comments

A. 20:10:21:02. 10-year plans.

Basin Electric provides comments on the above referenced proposed rule. While Basin Electric is generally not opposed to providing decommission plans to the Commission in

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advance of such activities, Basin Electric thinks a 10-year time frame is much too long of a time period for such planning activity. First, for Basin Electric's planning process, it is generally not known 10 years out when a Basin Electric-owned facility will be decommissioned. Further, to have a detailed plan that far out would also be difficult to put together as costs, regulatory requirements, salvage value, and engineering advancements will likely change in that time period. It is our belief that a more accurate and detailed plan would be more useful to the Commission and members of the public. Basin Electric suggests that the time frame period be shortened to two years.

B. 20:10:39:07. Qualified testing professional.

SDREA provides comments on the above-referenced proposed rule. SDREA concurs with reducing the required hours of stray voltage training for electricians from 48 hours to 40 hours, contained in subsection (2) of the rule. SDREA submits that the same reduction in training hours should be adopted in subsection (1) of the rule regarding professional engineers. SDREA believes the training requirements for PEs and electricians should be consistent, and should be 40 hours for both professionals.

SDREA and Basin Electric look forward to continuing to work with the Commission, Commission staff, and other interested parties in this rule-making proceeding. Thank you for the opportunity to comment. Please do not hesitate to contact me if you have any questions regarding the comments submitted herein.

Sincerely yours,

RITER, ROGERS, WATTIER &  
NORTHROP, LLP

By:



Darla Pollman Rogers  
Attorney for SDREA and Basin Electric