



South Dakota Public Utilities Commission
Ms. Kristie Fiegen, Chairperson
500 East Capitol Avenue
Pierre, SD 57501-5070

Re: RM23-001 - In the Matter of the Adoption of Administrative Rules

Commissioner Fiegen,

On behalf of the South Dakota Agri-Business Association (SDABA), I am writing to provide comments on PUC's proposed administrative rule change to *20:10:12:15. Financial criteria for licensing*. With nearly 600 members, SDABA is the state's largest association representing ag retailers, grain elevators and those companies that support them.

Our members have a strong track record of reassessing the regulatory requirements they abide by, suggesting and supporting improvements for the betterment of the entire industry. The proposed rule change to modify financial criteria for licensing is a positive adjustment, and SDABA supports its implementation. The required financial standards must adequately cover the risk they were intended to address. We feel the change from solvency to \$100,000 for a Class B license that allows a buyer up to \$5 million in grain purchases is more than appropriate. The same is true for the modest change in requirements for a Class A license who handles more than \$5 million in purchases.

South Dakota's grain buyer laws help legitimize our industry, so it's important that the minimum standards set in place are an accurate reflection of financial stability. We appreciate the opportunity to comment and thank the PUC for proposing the change in financial criteria.

Respectfully,

Liv Stavick
Executive Director



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