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July 16, 2015

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

RE: Docket EL15-013 In the Matter of the Application of Black Hills Power, Inc. for
Approval of Tariff Revisions

Dear Ms. Van Gerpen:

On June 25, 2015, Chairman Nelson filed a proposal requesting four revisions to the proposed Meter Data and Privacy Policy tariff. Black Hills Power appreciates Chairman Nelson's thoughtful review and recommendations and offers the following comments and suggestions in response:

1. Section 901 – Meter Data Definition

The first proposed change requests that any data collected from behind the meter be treated with the same privacy policy as data generated by the meter. Black Hills Power agrees that any data collected behind the meter should be subject to the Meter Data and Privacy Policy. However, the Company does not collect any data behind the meter presently and including the proposed change in the tariff would potentially lead customers to believe that the Company possesses behind the meter data when it does not. The Company recommends no revision to Section 901 at this time.

However, if at some point in the future Black Hills Power begins collecting behind the meter data, Black Hills Power will commit to modifying the Meter Data and Privacy Policy tariff in a manner that is consistent with Chairman Nelson's suggested revision.

2. Section 903 – Data Protection and Security

The Company agrees with the revisions proposed by Chairman Nelson with the exceptions of striking the word "appropriate" and striking the second reference to "subpoena".

The second paragraph would be amended as follows: "..... as required by law enforcement agencies with a warrant or subpoena, social service agencies, or regulatory agency orders, rules, or regulations and exceptions permitted by federal or state statutes or laws."

3. Section 904 - Black Hills Power's affiliates, contracts, and agents

The third proposed change interchanges Black Hills Power, the regulated entity, with Black Hills Corporation, the holding company of a number of companies, in a way that may not be intended. Thus, adding the proposed language might create the potential for confusion and may not be enforceable. Black Hills Power believes it understands Chairman Nelson's intent and offers an alternative to his proposal:

"Black Hills Power will require any affiliate and the affiliate's employees, agents, and contractors having access to the data subject to this policy to treat such data in the same manner as required of Black Hills Power under its Meter Data and Privacy Policy."

The Company believes the above language achieves the same outcome and differentiates between the regulated entity and the holding company.

4. Section 904 – Aggregated vs. Individual Data

The Company agrees with Chairman Nelson's fourth revision of placing the last sentence of the second paragraph in Section 904 in a separate paragraph.

This docket is scheduled to be considered by the Commission during the July 21, 2015, Commission meeting. The Company will submit revised tariffs after the Commission renders its decision, and recommends an August 1, 2015, effective date.

Thank you for your consideration,



Jon Thurber

Manager, Revenue Requirements