

MAY ADAM

— Since 1881 —

WWW.MAYADAM.NET

ROBERT B. ANDERSON
TIMOTHY M. ENGEL
MICHAEL F. SHAW
BRETT KOENECKE
CHRISTINA L. KLINGER
JUSTIN L. BELL
DOUGLAS A. ABRAHAM
KARA C. SEMMLER

May 27, 2016

Writer's E-mail: brett@mayadam.net

OF COUNSEL
DAVID A. GERDES
CHARLES M. THOMPSON
GLENN W. MARTENS 1881-1963
KARL GOLDSMITH 1885-1966
BRENT A. WILBUR 1949-2006
TELEPHONE
605 224-8803
FAX
605 224-6289

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

RE: In the Matter of the Petition for Electrical Service by Dakota Plains Ag Center, LLC to have NorthWestern Energy Assigned as its Electric Provider in the Service Area of BonHomme – Yankton Electric. EL 16-013
Our File: 7018

Dear Patty:

Enclosed for filing please find:

- 1) Motion in Limine
- 2) Motion to Quash
 - a) Memorandum in Support of Motion to Quash
- 3) Motion for Summary Judgment
 - a) Statement of Material Facts
* CONFIDENTIAL Exhibit A
 - b) Brief in Support of Motion for Summary Judgment
 - c) Affidavit of Reed McKee
 - d) Affidavit of Dan Mutschelknaus
* Exhibit C
 - e) Affidavit of Matthew Winsand
* CONFIDENTIAL Exhibit A

Very truly yours,

MAY, ADAM, GERDES & THOMPSON LLP



BRETT KOENECKE

MAY, ADAM, GERDES & THOMPSON LLP
503 SOUTH PIERRE STREET • P.O. BOX 160
PIERRE, SOUTH DAKOTA 57501-0160