
BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE APPROVAL OF
STRAY VOLTAGE QUALIFIED TESTING
PROFESSIONALS

DOCKET NUMBER EL18-014

PETITION OF
SDREA TO INTERVENE

Pursuant to SDCL § 1-26-17.1 and ARSD 20:10:01:15.02, South Dakota Rural Electric Association (“SDREA”) by its undersigned counsel files this Petition to Intervene as a party in the above-referenced matter. In support of its Petition, SDREA states as follows:

1. On March 19, 2018, STAR Energy Services, LLC filed a Petition to be approved by the South Dakota Public Utilities Commission (“Commission”) to provide Stray Voltage Investigations and Analysis in the State of South Dakota pursuant to ARSD 20:10:39:07 through 20:10:39:09.

2. SDREA is an organization comprised of member electric cooperatives in South Dakota. SDREA is devoted to the protection of the interests of its member electric cooperatives and their customers.

3. SDREA has a well-documented interest in stray voltage, demonstrated by the following:

(a) SDREA drafted, caused to be introduced, and advocated for the passage of the Stray Electrical Current and Voltage Remediation legislation, which was adopted by the South Dakota Legislature in 2015 and is codified as SDCL Ch. 49-47.

(b) SDREA provided input by actively participating in both the informal and formal rulemaking process that this Commission implemented to promulgate the rules required by SDCL § 49-47-2. SDREA submitted informal and formal comments, as well as oral comments throughout the rulemaking process. More recently, SDREA provided the initial forms for six stray voltage tests, and thereafter continued to provide input into the forms.

(c) SDREA provided input into the stray voltage training programs in docket EL17-024.

4. In its letter of application seeking approval to provide Stray Voltage Investigations and Analysis in South Dakota, Star Energy Services states, “Recently a South Dakota utility requested that we visit one of their customer’s farms to investigate a report of stray voltage.”

5. SDREA has members that are South Dakota utilities providing services to dairy producers. Accordingly, the issue of stray voltage directly affects and impacts many of SDREA’s member companies. Thus, SDREA has a direct interest in this docket.

6. ARSD 20:10:39:07 provides the criteria for an individual to be a qualified testing professional. ARSD 20:10:39:08 provides the criteria for an individual to be a qualified testing analyst. ARSD 20:10:39:09 provides a process for qualification of a qualified testing professional or analyst of a person who does not satisfy the qualifications in ARSD 20:10:39:07 or 20:10:39:08. In addition to its other interests in this docket, SDREA seeks clarification of the process moving forward if an individual meets the criteria under ARSD 20:10:39:07 or 20:10:39:08, and specifically the need for an open

docket and application for certification by the Commission pursuant to ARSD 20:10:39:09 if the criteria is met.

7. In the rulemaking process (RM16-001) and in development of the stray voltage test forms, this Commission and Commission Staff have encouraged broad and active participation from all parties with an interest in stray voltage.

8. Furthermore, the issues presented in this docket and in SDREA's proposed Petition to Intervene constitute matters of public interest. Thus, denial of this Petition would be detrimental to the public interest and is likely to result in a miscarriage of justice.

WHEREFORE, SDREA requests that the Commission permit its intervention and participation in this proceeding.

Dated this 30th day of March, 2018.

Riter, Rogers, Wattier & Northrup, LLP

By: *Darla Pollman Rogers*

Darla Pollman Rogers
Margo D. Northrup
Attorneys for SDREA
P. O. Box 280
Pierre, South Dakota 57501
Telephone (605) 224-5825

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Petition of SDREA to Intervene was served via electronic filing with the South Dakota Public Utilities Commission and via email on the following individuals:

Ms. Patricia Van Gerpen
Executive Director
South Dakota Public Utilities Commission
500 E. Capitol Ave.
Pierre, SD 57501
patty.vangerpen@state.sd.us

Ms. Kristen Edwards
Staff Attorney
South Dakota Public Utilities Commission
500 E. Capitol Ave.
Pierre, SD 57501
Kristen.edwards@state.sd.us

Mr. Darren Kearney
Staff Analyst
South Dakota Public Utilities Commission
500 E. Capitol Ave.
Pierre, SD 57501
darren.kearney@state.sd.us

Mr. Alan William Haman
CEO & Principal Engineer
STAR Energy Services LLC
6841 Power Lane SW
Alexandria, MN 56308
alhaman@star-energy.com

Mr. Anthony Kassa
STAR Energy Services LLC
6841 Power Lane SW
Alexandria, MN 56308
tkassa@star-energy.com

Mr. David Kvidt
Master Electrician
STAR Energy Services LLC
6841 Power Lane SW
Alexandria, MN 56308
dkvidt@star-energy.com

Dated this 30th day of March, 2018.



Darla Pollman Rogers
Margo D. Northrup
Riter, Rogers, Wattier & Northrup, LLP
P. O. Box 280
Pierre, South Dakota 57501
Telephone (605) 224-5825