

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE
COMPLAINT OF ENERGY OF UTAH,
LLC AND FALL RIVER SOLAR, LLC
AGAINST BLACK HILLS POWER
INC. DBA BLACK HILLS ENERGY
FOR DETERMINATION OF AVOIDED
COST**

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**ENERGY OF UTAH AND FALL
RIVER’S RESPONSES TO STAFF’S
FIRST SET OF DATA REQUESTS**

EL18-038

Energy of Utah, LLC and Fall River Solar, LLC make the following responses to Staff’s First Set of Data Requests, subject to the objections noted herein. Please submit responses within 20 business days, or promptly contact Staff to discuss an alternative arrangement. In addition, please specify the responder when answering each interrogatory. In the responses below, Black Hills Energy is referred to as “BHE” and Energy of Utah, LLC/Fall River Solar, LLC is referred to as “Fall River.”

- 1-5) Beside assigning a “0” dollar value during long-2 situations, please identify all inputs, assumptions, and forecasts used by BHE in their ABB Enterprise Planning and Risk model that Fall River is challenging. For each input, assumption, and/or forecast Fall River is challenging, please provide support for Fall River’s position.

Response: As expressed in pleadings, briefing and other discovery responses, there is a fundamental difference between the methodology BHE employed to calculate avoided cost and the methodology Fall River employed to calculate avoided cost. Fall River has only recently received full and complete answers to its discovery requests and contemplates further discovery. Until discovery is more fully developed, Fall River cannot answer the question as posed.

- 1-6) Please identify if Fall River agrees with the amount of the capacity deficiency forecasted by BHE over the 20-year PPA term. If Fall River disagrees with this forecasted capacity deficiency, please provide support for Fall River’s position.

Response: Fall River Solar cannot reasonably answer this question without the same level of detail that BHE has access to in the derivation of its future energy and capacity needs. Future discovery may supply the information.

1-11) Does Fall River know how much the interconnection cost will be for the project? If so, please provide a breakdown of the costs and who is obligated to pay those costs.

Response: The BHE Interconnection Feasibility Study and System Impact Study reports the cost of interconnecting the Fall River Solar project, including network upgrades, as a network Network Resource designation as \$335,000 for the network upgrades and \$4,775,000 for the interconnection facilities. Fall River Solar is responsible for the entire interconnection cost.