



20 April 2021

Public Utilities Commission
Capitol Building, 1st Floor
500 East Capitol Avenue
Pierre, SD 57501-5070

RE: Request to Intervene in Docket EL21-011

Black Hills Homestead (BH Homestead) wishes to intervene in Docket EL21-011 brought by Black Hills Power, Inc. (BHE) to Amend its Cogeneration and Small Power Production Service Tariff. BH Homestead will be directly and adversely impacted by this change if allowed to proceed. BH Homestead did not receive any official notice of this proposed change from BHE, and only became aware of this amendment request on 16 April 2021 through a 3rd party (not BHE). BH Homestead therefore requests an intervener status, even though the official period has closed.

BH Homestead plans to develop an agritourism facility north of Spearfish (agritourism is one of the niche areas of development for the SD Department of Tourism). BH Homestead has designed a visitor experience to showcase the agricultural diversity of South Dakota's heritage along with innovative design features, such as renewable energy. BH Homestead's goal is to provide a unique experience that will draw more visitors to the Northern Black Hills.

BH Homestead wishes to ensure that the success of its agritourism development is not affected by this tariff change. If the amendment passes as requested, it would essentially eliminate any small-scale power cogeneration, because it would make it fiscally unadvisable. The most impactful aspect of BHE's request is the "buy all, sell all" approach, where, in Mr. Keil's testimony, he states, "The customer would ... pay for all energy consumed – whether "self-generated" or from the "grid".

Overall, this request would mean that BH Homestead pays for the installation of the cogenerating equipment, pays up to \$1,000 fine to join the grid (pg 10 of Mr. Keil's testimony), pays a monthly meter fee (pg 12 of Mr. Keil's testimony), and then also pays for the electricity BH Homestead generated on its own property with its own equipment (pg 7 of Mr. Keil's testimony).

To put it another way, Mr. Keil's testimony describes how you still need to maintain a car, even if you decide to ride a bicycle sometimes. The real savings is from paying for gas (he states):

- "Do I still need to buy gas? Yes, but not nearly as much and this is where my savings will come from."

But if the BHE's request were to be approved, then, using their analogy, it would cost *more* to own a car if you rode a bicycle.

- Do I still need to buy gas? Yes, AND you also need to pay the local fuel station for the miles you rode your bike, because it has to be there when you need it. It's not fair to pass those costs onto people who buy a lot of gas.

So, if you want to bike to save gas, you have to buy your car AND your bike, AND pay for the gas you didn't even use by riding your bike. Therefore, by buying a bicycle, you actually have zero savings, and in fact, it will cost you more to maintain your car if you ride your bike.

If this tariff is passed as written, several of the main components of BH Homestead's new agritourism business would be at risk, which is a significant and unexpected financial burden. BH Homestead asks that you reject this amendment request as putting an unreasonable burden on small business interests within the BHE footprint.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Capp", written over a thin horizontal line.

Jared "Cappie" Capp
Owner
Black Hills Homestead
609 Nellie Lane
Spearfish, SD 57783