



The Vertically Integrated Solution
that Powers the Possibilities.

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April 21, 2021

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

RE: Request to Intervene in Docket EL21-011

GenPro Energy Solutions, LLC, wishes to intervene in Docket EL 21-011 brought by Black Hills Power, Inc. (Black Hills Energy) to Amend its Cogeneration and Small Power Production Service Tariff. GenPro Energy Solutions will be directly and adversely impacted by this amendment if passed. GenPro Energy Solutions did not receive any official notice of this proposed change from Black Hills Energy and became aware of this from multiple phone calls and messages from concerned customers, both existing and potential. GenPro Energy Solutions therefore requests an intervener status, even though the official period has closed.

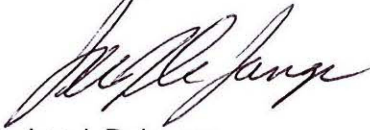
GenPro Energy Solutions is a provider of electrical, lighting, energy efficiency, and renewable energy solutions in the Black Hills Region. GenPro has been in business since 2005 serving the energy and electrical service needs of customers who desire to improve and/or reduce their energy requirements, become more energy efficient, and reduce the need for future utility generation through partnerships with developers, utilities, businesses, universities, school districts, and private customers alike.

It is our opinion that this amendment will, in effect, eliminate all self-generation opportunities for all Black Hills Energy customers, whether it be renewable or other technology. This "buy-all, sell-all" provision would essentially prohibit customers from using their own solar energy, forcing them to sell all of their energy back to the grid at low rates, only to buy it back at higher rates. Eliminating the fiscal feasibility of such systems will end future grid-tied renewable generation.

In addition to the negative economic impact on our business, we believe that renewable energy will play a significant role in the economic development of the Black Hills region. Companies desiring to come to South Dakota and enjoy the freedoms that we do are increasingly interested in incorporating renewable energy into their business models. This amendment damages our ability to attract industries that value a smart and sustainable approach to energy consumption and production.

We respectfully ask that the Commission reject this proposed amendment, as it would be a significant and radical change to how cogeneration facilities are treated, and blatantly denies consumers the ability to utilize capital investments on their own property beyond the defined point of connection to the utility.

Sincerely,



Lee J. DeLange
Chief Operating Officer
GenPro Energy Solutions, LLC