

**Docket Number:** EL23-018  
**Subject Matter:** First Data Request  
**Request to:** RPG Energy Group  
**Request from:** South Dakota Public Utilities Commission Staff  
**Date of Request:** 7/20/2023  
**Responses Due:** 7/28/2023

- 1-1) Will the building have gas service? **No, the buildings will be serviced by electric only.**
- 1-2) If the answer to question 1 above is “yes”:
  - a) Identify what mechanical equipment will be operated on gas, and
  - b) Identify if the variance request is intended to apply to gas service as well.
- 1-3) Provide an explanation of how each apartment will be heated, cooled, and supplied with hot water including the type of utility service (i.e. electric or natural gas) that will be used for each. **Independent water heaters and HVAC units will be provided to each apartment that will all be on electric service. There will be no centralized HVAC systems.**
- 1-4) Confirm that RPG Energy Group has determined the building does not meet the exception to the individual metering rules in ARSD 20:10:26:04(6) based on your understanding of that rule. **Confirmed, this development contains multi-occupancy buildings with more than two units that do not have central heating or cooling systems, central ventilating systems, or central water heating systems.**
- 1-5) Will each of the six buildings have their own meter or will all six buildings be on one meter? **We are requesting for all 6 buildings to have 1 master meter configuration. We will install a master metering cabinet and a distribution switch that will contain the power output of the solar system as well as the power to all the facility loads. This way, the solar power flows to the facility loads first before going back to the utility.**
- 1-6) Confirm that the residents of any of these facilities will not receive a bill from RPG Energy Group, Elmington Capital, or any other company for their utilities. **Confirmed, the residents will not receive a bill for their utilities.**
- 1-7) Will individual units have restrictive thermostats to limit temperature settings? **No, the units will not have restrictive thermostats.**
- 1-8) Refer to section 3 of the letter. Explain why RPG Energy Group analyzed the customer charge information with the General Service – Total Electric customer charger rather than the residential customer charge. **RPG Energy Group analyzed these specific utility rates because those were the rates that were given to us by Black Hills Electric when we discussed this specific project. If the analysis needs to show the customer charge based on the residential service tariff then there would still be a positive savings as that rate requires a \$12/month charge per each individual meter vs. having no charge at the General Service – Large tariff.**
- 1-9) Provide a total cost estimate for installation of individual meters. **The total cost estimate for just the meter banks to install would be around \$50,000. Along with the individual meter charges, the**

solar project cost will increase dramatically if the system was individually metered as there would need to be 249 individual interconnection points rather than just 1 interconnection point with the master meter configuration. If the system were to be connected at 249 individual connections, it would add as estimated \$1,500,000 to the overall project cost. So a grand total construction upcharge for this development if the customer went with the individual meter configuration would total around \$1,550,000. This does not include the added \$35,856 annual customer charge on the utility bill that would be incurred assuming the residential rate tariff as described above.

- 1-10) Provide a total cost estimate for installation of a single meter. Black Hills Energy estimates the master metering configuration to cost around \$90,000. With this metering configuration, the solar project would be able to connect at a single point of interconnection and be able to offset the load of all 6 buildings which creates the most cost-effective scenario for the development. Also, with the master metering configuration, the customer would be on General Service – Large utility rate tariff and would not have to pay the base \$35,856 per year.
- 1-11) Do any of the tax credits, debt financing, or assistance programs require the project to be master metered? In order to claim some of the major tax credits available for this project, the solar array must be installed to offset the load of the units and provide a benefit to the low-income residents expected to reside at the premises. The solar project is much more financially viable if it were connected at 1 point with 1 master meter configuration rather than 200 individual connections, especially given the Owner's willingness to pay for all residents' utilities.