

Docket Number: EL24-027
Subject Matter: Answers to First Data Request
Answers from: East River Electric Power Cooperative, Inc. (East River)
Answers to: South Dakota Public Utilities Commission Staff

1-1. Does East River dispute that Leola Data Center (LDC) is a new customer? If yes, explain.

Answered by Daniel Brown, East River General Counsel:

East River is without sufficient information to dispute or confirm that LDC is a new customer and puts LDC to strict proof thereof. Discovery is pending. East River reserves the right to supplement this answer upon completion of discovery.

1-2. Does East River dispute that the location to be served by MDU is a new location? If yes, explain.

Answered by Daniel Brown:

East River is without sufficient information to dispute or confirm that the location to be served by MDU is a new location and puts LDC to strict proof thereof. Discovery is pending. East River reserves the right to supplement this answer upon completion of discovery.

1-3. Does East River dispute that LDC's facilities will be located outside municipalities as the boundaries thereof existed on March 21, 1975? If yes, provide support for that position.

Answered by Daniel Brown:

No.

1-4. Does East River dispute that LDC's contracted minimum demand will be 2 MWs or more? Explain why or why not.

Answered by Daniel Brown:

East River is without sufficient information to dispute or confirm that LDC's contracted minimum demand will be 2 MWs or more. Discovery is pending. East River reserves the right to supplement this answer upon completion of discovery.

1-5. Does East River dispute that MDU has access to a reliable supply of power to serve LDC's load? If yes, explain.

Answered by Daniel Brown:

East River is without sufficient information to dispute or confirm that MDU has access to reliable supply of power to serve LDC's load. East River reserves the right to supplement this answer upon completion of discovery.

- 1-6. With specificity, please identify any and all pertinent factors affecting the ability of MDU to furnish adequate electric service to fulfill LDC's requirements that East River plans to raise at hearing.

Answered by Daniel Brown:

East River is without sufficient information to answer this question. Discovery is pending. East River reserves the right to supplement this answer upon completion of discovery.

Dated the 25th day November, 2024.

East River Electric Power Cooperative,
Inc.

By: /s/Daniel J. Brown

Daniel J. Brown

General Counsel

East River Electric Power Coop., Inc.

211 South Harth Ave.,

PO Box 227

Madison, SD 57042

(605) 256-4536

dbrown@eastriver.coop