

# **EXHIBIT C**

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

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**IN THE MATTER OF THE PETITION  
BY LEOLA DATA CENTER LLC TO  
HAVE MONTANA DAKOTA  
UTILITIES CO., A SUBSIDIARY OF  
MDU RESOURCES GROUP INC.  
ASSIGNED AS ITS ELECTRIC  
PROVIDER IN THE SERVICE AREA  
OF FEM ELECTRIC ASSOCIATION  
INC.**

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**EAST RIVER'S, BASIN'S AND  
FEM'S FIRST SET OF DATA  
REQUESTS TO MDU**

**EL24-027**

Below, please find East River Electric Power Cooperative, Inc. ("East River"), Basin Electric Power Cooperative Inc. ("Basin Electric") and FEM Electric Association, Inc. ("FEM") First Set of Data Requests to Montana-Dakota Utilities CO. ("MDU"). Please specify the responder when answering each interrogatory. Should any response have subparts answered by more than one individual, identify the respondent by subpart. Consider these questions to be a continuing request and supplement responses with any changes. It is requested that the responses be returned to East River, Basin and FEM no later than 5:00 p.m. CT on December 18, 2024.

1-1) Please provide a copy of all data requests MDU received from any party and MDU's responses to the data requests. This should be considered a continuing request.

**Response:**

Objection, the data request calls for responses from Montana-Dakota which constitute trade or business secrets and are thus confidential in nature. Staff sent three sets of data requests to Montana-Dakota. Those were answered timely and Montana-Dakota claimed confidential treatment for the following answers.

Those DR's were 1-3, 1-4, 1-5, 3-1, 3-2, 3-6, 3-7, 3-8, 3-10, 3-11, 3-15, 3-16, 3-17, 3-20, 3-21, 3-22, 3-24, 3-27 and 3-28. Montana-Dakota claims confidentiality pursuant to state law and commission rule on those answers.

Without waiving the objection, see responses to Staff DR's attached hereto.

**East River/Basin/FEM**

**Response No. 1-1**

**Attachment A**