

**Docket Number: EL24-027**

**Subject Matter: Answers to First Data Request**

**Answers from: FEM Electric Association, Inc. (FEM)**

**Answers to: South Dakota Public Utilities Commission Staff**

- 1-1. Leola Data Center, LLC (LDC) mentions on page 1 of its petition that it will be located adjacent Montana-Dakota Utilities Co.'s (MDU's) Leola substation.

**Answered by Vaughn P. Beck, FEM Counsel:**

**FEM would have the same distance as MDU to build line. The Leola MDU substation is part of the MISO (Midwest Independent System Operations) which allows MISO participants equal access to the Leola Substation.**

**FEM management has not received a map or plat of the proposed data center.**

- 1-2. What is LDC's expected load factor? What is LDC's expected coincidence factor with respect to FEM/East River's peak?

**Answered by Vaughn P. Beck, FEM Counsel:**

**FEM is without sufficient information to answer this question. FEM reserves the right to supplement this answer upon completion of discovery.**

- 1-3. Provide a detailed description and breakdown of all costs of FEM extending service to LDC, including but not limited to substation costs, lines, transformers, etc.

**Answered by Vaughn P. Beck, FEM Counsel:**

**FEM is without sufficient information to answer this question. FEM reserves the right to supplement this answer upon completion of discovery.**

- 1-4. Explain in detail the adequacy of FEM's power supply to serve this new large load customer. Describe FEM's current capacity status and reserve margin and describe what effect the provision of service to this customer will have on the same. Provide FEM's existing average system capacity cost. Explain at what point FEM will have to add or purchase capacity to maintain an adequate reserve margin. Explain how such capacity would be acquired and what price might be expected for incremental capacity.

**Answered by Vaughn P. Beck, FEM Counsel:**

**FEM is without sufficient information to answer this question. FEM reserves the right to supplement this answer upon completion of discovery.**

- 1-5. Describe how providing service to this customer will serve to improve FEM’s electric system either locally or system-wide including related economic factors.

**Answered by Vaughn P. Beck, FEM Counsel:**

**Any positive margins remain local and are used locally. Electric Cooperatives pay kilowatt hour taxes that are collected by the electric cooperative and then distributed to local school districts.**

- 1-6. Provide CAIDI, SAIDI, and SAIFI indices reliability data for that portion of FEM's system nearest the proposed customer, if available, or in the alternative, for FEM's system for the last three years. Provide a report of outages that would have affected the proposed customer over the last three years.

**Answered by Vaughn P. Beck, FEM Counsel:**

<b>SAIDI: Outage Minutes Per Consumer for Total System</b>					
<b>Year</b>	<b>Cause</b>				<b>Total</b>
	<b>Power Supplier</b>	<b>Major Event</b>	<b>Planned</b>	<b>All Others</b>	
<b>2019</b>	54.0	0.0	0.0	33.0	87.0
<b>2020</b>	19.0	0.0	0.0	65.0	84.0
<b>2021</b>	35.0	452.0	18.0	71.0	576.0
<b>2022</b>	11.0	26.0	17.0	75.0	129.0
<b>2023</b>	9.0	1002.0	34.0	75.0	1120.0
<b>Average</b>	<b>25.6</b>	<b>296.0</b>	<b>13.8</b>	<b>63.8</b>	<b>399.2</b>

**Note that the above numbers are for FEM’s entire system. Currently, they cannot be broke down for specific areas with the limited information currently available. FEM reserves the right to supplement this answer upon completion of discovery.**


**FEM is without data for CAIDI or SAIFI numbers. FEM reserves the right to supplement this answer upon completion of discovery.**

- 1-7. Describe in detail any other pertinent factors affecting FEM’s ability to furnish adequate electric service for this customer.

**Answered by Vaughn P. Beck, FEM Counsel:**

**FEM has the same ability and would use the same resources to serve the Leola Data Center at the selected location.**

Dated this 25<sup>th</sup> day of November, 2024

  
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