

Docket Number: EL24-027

Subject Matter: Answers to Second Data Request

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

Answers to: South Dakota Public Utilities Commission Staff

2-1. Does FEM dispute that Leola Data Center (LDC) is a new customer? If yes, explain.

Answered by Vaughn P. Beck, FEM Counsel:

FEM does not dispute that Leola Data Center is a new customer.

2-2. Does FEM have existing facilities providing electric service to LDC's property adjacent to Montana-Dakota Utilities Co.'s Leola substation at 11641 358th Avenue, Leola, South Dakota?

Answered by Vaughn P. Beck, FEM Counsel:

FEM's response would be the same as the response provided in question 1-1.

2-3. Does FEM dispute that the location to be served by MDU is a new location? If yes, explain.

Answered by Vaughn P. Beck, FEM Counsel:

FEM believes that the proposed facility will be a new location, however, a map or plat of the proposed site has not been provided to FEM. FEM reserves the right to supplement this answer upon completion of discovery.

2-4. Does FEM 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 Vaughn P. Beck, FEM Counsel:

FEM believes that the proposed facility will be outside municipal boundaries, however, a map or plat of the proposed site has not been provided to FEM. FEM reserves the right to supplement this answer upon completion of discovery.

2-5. Does FEM dispute that LDC's contracted minimum demand will be 2 MWs or more? Explain why or why not.

Answered by Vaughn P. Beck, FEM Counsel:

FEM does not have sufficient information to dispute or confirm. FEM reserves the right to supplement this answer upon completion of discovery.

2-6. Does FEM dispute that MDU has access to a reliable supply of power to serve LDC's load? If yes, explain.

Answered by Vaughn P. Beck, FEM Counsel:


FEM does not have sufficient information to dispute or confirm. FEM reserves the right to supplement this answer upon completion of discovery.

2-7. 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 FEM plans to raise at hearing.

Answered by Vaughn P. Beck, FEM Counsel:

FEM does not have sufficient information to dispute or confirm. FEM reserves the right to supplement this answer upon completion of discovery.

Dated this 25th day of November, 2024



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