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

IN THE MATTER OF THE PETITION OF
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.

EL	24-	027

JOINT MOTION TO COMPEL DISCOVERY BY FEM ELECTRIC ASSOCIATION, INC., EAST RIVER ELECTRIC POWER COOPERATIVE, INC., AND BASIN ELECTRIC POWER COOPERATIVE

COME NOW FEM Electric Association, Inc. ("FEM"), East River Electric Power Cooperative, Inc. ("East River"), and Basin Electric Power Cooperative ("Basin Electric") (collectively, the "Intervenors"), by and through their counsel of record, and jointly request the following relief against each of Leola Data Center LLC and Montana Dakota Utilities Co.:

1. FOR AN ORDER, pursuant to SDCL 15-6-37(a)(2) and 15-6-37(a)(3), compelling

Leola Data Center LLC to provide full and complete responses to the following:

- a. Interrogatory No. 21 and Request for Production No. 4 of Intervenors' October 4, 2024, discovery requests, and
- b. Request Nos. 1-1, 1-4, 1-5, 1-6, and 1-13 of Intervenors' December 11, 2024, discovery requests.

2. FOR AN ORDER, pursuant to SDCL §§ 15-6-37(a)(2) and 15-6-37(a)(3), compelling Montana Dakota Utilities Co. to provide full and complete responses to Intervenors' December 3, 2024, discovery requests to Montana Dakota Utilities Co., specifically Request 1-1. Dated this 9th day of January, 2025.

Meredith A. Moore

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Vaughn P. Beck Beck Law 509 Bloemendaal Drive, PO Box 326 Ipswich, SD 57451 Telephone: (605) 426-6319 Email: <u>becklaw@midconetwork.com</u> *Attorneys for FEM Electric Association, Inc.*  Dated this 9th day of January, 2025.

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