## STATE OF SOUTH DAKOTA BEFORE THE PUBLIC UTILITIES COMMISSION

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.

DOCKET NO. EL24-027

## RESPONSE

COMES NOW Leola Data Center ("LDC"), by and through its counsel of record, William M. Van Camp, and responds to the Staff of the Public Utilities Commission's First Data Request:

- 1. LDC mentions on page 1 of its petition that it will be located adjacent MDU's Leola substation.
  - a. Provide the distance that MDU will have to build power lines in order to meet the needs of LDC.
    - RESPONSE: Upon information and belief, no additional MDU power lines will be needed to serve LDC. There will be short electrical connections from LDC to MDU's Leola substation.
  - b. Provide a localized map of the area including all LDC buildings, facilities, and lot lines and all MDU electrical facilities as well as detail on if the lines will be above ground or below ground.
    - RESPONSE: LDC has leased 20 acres adjacent to MDU's Leola substation as generally shown in Exhibit 1-1b. LDC is in the process of finalizing the project design. MDU's electrical facilities are known by MDU and not LDC.
  - c. Provide the distance that FEM Electric Association, Inc. (FEM) would have to build power lines in order to meet the needs of LDC.

RESPONSE: Unknown by LDC.

d. Provide a localized map of the area including all LDC buildings, facilities, and lot lines and all FEM electrical facilities as well as detail on if the lines will be above ground or below ground.

RESPONSE: FEM electrical facilities are unknown by LDC.

2. Is LDC looking to have MDU provide service for all structures that may be built on the lot location as described in the warranty deed? Explain.

RESPONSE: No. LDC is requesting that MDU provide service to the new project that will be built within the 20-acre lease site generally shown in Exhibit 1-1b.

3. Provide the size and electrical detail of LDC's expected simultaneous load. Provide the size and electrical detail of LDC's expected connected load.

RESPONSE: LDC expects its initial load to be greater than 10 MW, ramping up to 50 MW at final completion.

4. (a) What is LDC's expected load factor?

RESPONSE: LDC's expected load factor is greater than 95%.

- 4. (b) What is LDC's expected coincidence factor with respect to MDU's peak? **RESPONSE: Unknown by LDC.**
- (c). What is LDC's expected coincidence factor with respect to FEM/East River's peak?
   RESPONSE: Unknown by LDC.



5. (b) 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.
RESPONSE: Unknown by LDC.

Dated this 23 day of September, 2024.

By: Bill Connors

AS TO OBJECTIONS.

Dated this 2 day of September, 2024.

OLINGER, LOVALD, MCCAHREN & VAN CAMP, PC.

By

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## CERTIFICATE OF SERVICE

William M. Van Camp, of Olinger, Lovald McCahren & Van Camp, P.C., hereby certifies that on the \_\_\_\_\_\_day of September, 2024, he filed and served a true and correct copy of the foregoing Response in the above-captioned action via the South Dakota Public Utilities Commission's electronic filing system on the following:

Mr. Logan Schaefbauer
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William M. Van Camp