

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

IN THE MATTER OF THE PETITION
FOR SWEETMAN CONST. CO. D/B/A
KNIFE RIVER, TO HAVE XCEL ENERGY
ASSIGNED AS ITS ELECTRIC
PROVIDER IN THE SERVICE AREA OF
SIOUX VALLEY ELECTRIC

**EL-25-032
RESPONSES OF EAST RIVER
ELECTRIC POWER COOPERATIVE,
INC. TO STAFF'S FIRST DATA
REQUEST**

Docket Number: EL25-032
Subject Matter: First Data Request
Request to: East River Electric Power Cooperative Inc.
Request from: South Dakota Public Utilities Commission Staff
Date of Request: 10/31/2025
Responses Due: 11/14/2025

1-1. Per SDCL § 49-34A-56(2) provide details about the availability of East River Electric Power Cooperative, Inc.'s (East River) adequate power supply for the anticipated load of 11 Megawatts. For example, where is the power supply located, what are the technical specifications of the power supply?

RESPONSE: East River has electric power supply and transmission capacity/services contracts with Western Area Power Administration and Basin Electric Power Cooperative ("Basin Electric") for and on behalf of East River's members. East River is a Class A Member of Basin Electric and has entered into a long-term, bilateral wholesale power supply contract with Basin Electric, pursuant to which Basin Electric sells and delivers capacity and energy requirements to East River for resale by East River to its member distribution cooperatives, including Sioux Valley Energy. Sioux Valley Energy provides retail electric service to its members, including Knife River. According to Basin Electric, they have an adequate power supply for the anticipated load of 11 Megawatts. East River maintains a 115 kV transmission system around the Knife River site as shown in Exhibit 1, adequate to serve the anticipated load. East River maintains a substation, Corson Substation, located on the northwest side of Corson within section 27-102-48 that currently serves Knife River via Sioux Valley Energy's distribution system.

1-2. Per SDCL § 49-34A-56(3) provide a detailed answer as to the development or improvement of East River's electric system, including the economic factors relating thereto, needed for East River to serve this customer.

RESPONSE: East River's transmission system is adequate to serve Knife River. The Corson Substation would be required to be upgraded to meet East River planning standards, to protect the system and existing customers. The costs for these upgrades would be the

responsibility of Knife River to ensure the expansion of Knife River is not subsidized by other East River members. East River's cost estimates have been provided to Sioux Valley Energy and incorporated into Sioux Valley Energy's cost estimates to serve the customer.

- 1-3. Per SDCL § 49-34A-56(4) provide the proximity of East River's adequate facilities from which electric service of the anticipated load of 11 Megawatts may be delivered. What type of service would be extended and what is the approximate cost East River anticipates to extend service to the customer? What existing facilities exist? Who would East River anticipate pay for such extension cost?

RESPONSE: East River maintains a 115 kV transmission system around the Knife River site as shown in Exhibit 1, adequate to serve the anticipated load. East River maintains a substation, Corson Substation, located on the northwest side of Corson within section 27-102-48 that currently serves Knife River via Sioux Valley Energy's distribution system. Knife River can be served via the Corson Substation, or a new independent substation can be built for Knife River on site, extending the transmission system into the plant.

- 1-4. SDCL § 49-34A-56(5) states the Commission shall consider the preference of the customer. Explain in detail why the Commission should disregard the preference of the Customer in favor of taking power from East River, taking into account that a new customer at a new location ... with a contracted minimum demand of 2,000 kilowatts or more is not obligated to take electric service from the electric utility having the assigned service area.

RESPONSE: This request addresses one of the six factors the Commission can take into consideration in determining whether a new customer at a new location may seek an alternate service provider. At this time, East River does not have any information to establish that Knife River is a new customer or that the location at issue is a new location. East River disputes the existence of a contracted minimum demand of 2,000 kilowatts. Awarding Xcel the right to serve Knife River's expansion would, among other things, result in the duplication of facilities and wasteful spending, which would not be an efficient and economical use and development of the electric system. In addition, it appears that cost of Xcel's additional distribution line and upgrade to its substation infrastructure to provide power to Knife River will be borne by the rate payers not the cost causer. Sioux Valley Energy, East River, and Basin Electric served a set of joint data requests on Knife River. Knife River's responses are not yet due. East River reserves the right to amend or supplement this response.

- 1-5. Per SDCL § 49-34A-56(6) provide any and all pertinent factors affecting the ability of East River to furnish adequate electric service to fulfill the customers' requirements.

RESPONSE: See Responses to Data Requests 1-1, 1-2, 1-3

- 1-6 Do you dispute that this is a new customer?

RESPONSE: Yes. Sioux Valley Energy, East River, and Basin Electric served a set of joint data requests on Knife River asking for all facts and documents establishing that Knife River

is a new customer seeking service at a new location. Knife River's responses are not yet due. East River reserves the right to amend or supplement this response when such information is known

1-7 Do you dispute that this is a new location?

RESPONSE: Yes. Sioux Valley Energy, East River, and Basin Electric served a set of joint data requests on Knife River asking for all facts and documents establishing that Knife River is a new customer seeking service at a new location. Knife River's responses are not yet due. East River reserves the right to amend or supplement this response when such information is known

1-8. Do you dispute that this is located outside municipalities?

RESPONSE: Based on the map included with Xcel Energy's Petition to Intervene, East River does not dispute that Knife River's proposed location is outside municipalities.

1-9. Do you dispute that Xcel has the availability of an adequate power supply?

RESPONSE: Sioux Valley Energy, East River, and Basin Electric served a set of joint discovery requests on Xcel Energy seeking information about how Xcel Energy intends to fulfill Knife River's demand and energy requirements, whether it will need to procure or construct additional capacity to cover Knife River's expected demand, and whether it has or will perform any studies on the large load addition to its transmission system. Xcel Energy's responses are not yet due. East River reserves the right to amend or supplement this response when such information is known.

Dated this 14th day of November, 2025.

East River Electric Power Cooperative, Inc.

/s/ Daniel J. Brown

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