

From: XDA Investments LLC [REDACTED]

Sent: Monday, August 24, 2026 5:59 PM

To: PUC-PUC <PUC@state.sd.us>

Subject: [EXT] Comments

EL26-003 - In the Matter of the Application of Black Hills Power, Inc. dba Black Hills Energy for Authority to Increase Rates For its Utility Service in South Dakota

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Commissioners,

I am writing as a concerned landlord and property owner in the Northern Black Hills. Over the past several years, my interactions with Black Hills Energy have raised concerns about certain policies that I believe are outdated and unnecessarily burdensome for property owners.

I would like to bring two issues to your attention: **service connection fees** and **property owners' access to energy usage information**.

Service Connection Fees

The current service connection fee model appears outdated and no longer reflects how modern electric meters and utility systems operate.

Historically, I was told by Black Hills Power & Light the service connection fee existed to cover the cost of sending a technician to physically travel to the property and read the meter. At the time, this made sense. A technician's time and travel represent real operational costs.

However, most meters today are electronic and are operated remotely. In many cases, starting or stopping service requires no field visit and only minimal administrative processing. Despite this change in technology, the same service connection fees continue to be charged.

This issue becomes particularly evident in the case of **Continuing Service Agreements (CSA)** used by landlords. These agreements allow utilities to automatically revert service to the landlord when a tenant vacates or falls behind on payments. The purpose is to prevent service interruption that could cause property damage, such as frozen pipes.

In these situations, the transition between tenant and landlord accounts occurs automatically through the utility's system. There is no technician visit and no additional operational work. Yet, a service connection fee is still charged when service moves to the landlord, and often again when service is transferred back to the tenant.

When the process is fully automated and no additional labor or operational cost is incurred, it is difficult to understand the justification for charging these fees.

What I am asking for:

The removal—or at minimum, a modernization—of service connection fees in cases where service changes occur electronically without a physical service visit.

Access to Energy Usage Information for Property Owners

My second concern involves property owners' limited access to energy usage information for properties that they own.

As a property owner, I would like access to basic energy usage information for my buildings, such as:

- Billing cycle dates
- Energy usage (kWh)
- Cost of energy consumed

I am **not seeking access to personal billing information** or financial details about tenants. My interest is solely in understanding how the property itself consumes energy.

Currently, utilities treat this information as private tenant data and require explicit tenant authorization before sharing it with the property owner. This creates an unnecessarily complicated process for information that relates directly to the physical property and its energy performance.

Access to this data would allow property owners to:

- Better understand how properties are using energy
- Identify opportunities for energy efficiency improvements
- Evaluate the effectiveness of upgrades such as insulation, windows, or heating systems
- Perform cost-benefit analyses on improvements
- Provide prospective tenants with accurate information about expected energy costs

In short, access to usage information helps property owners improve their buildings and reduce costs for tenants.

At present, Black Hills Energy requires each tenant to contact the utility and grant permission for the landlord to access this information. This creates a multi-step process for both tenants and landlords, requiring phone calls and administrative coordination. Further BHE can't deliver historical information on the account but only the current month statistics. Given that contacting the utility often involves extended wait times, this process becomes unnecessarily time-consuming for all parties.

To work around this, I currently have tenants sign a **limited power of attorney** allowing me to access energy usage information for the property they rent. The authorization is limited to that specific address and only for the purpose of viewing usage and cost information. In my experience, tenants have had no concerns about this arrangement.

Even with this authorization, obtaining the information from Black Hills Energy has often been difficult and inconsistent. On multiple occasions I have had to resend documentation or make repeated requests before receiving the information.

This suggests the need for a clearer and more streamlined policy.

What I am asking for:

Allow property owners access to basic energy usage and cost information for properties they own, presented in the same format provided to customers, while excluding any personal billing or financial details of tenants.

Closing

These two issues—outdated service connection fees and limited access to property energy usage data—create unnecessary barriers for property owners who are trying to responsibly manage and improve their buildings.

Modernizing these policies would reduce administrative burdens, improve transparency, and help property owners make energy-efficient improvements that ultimately benefit tenants and the broader community.

Thank you for your time and consideration.

Sincerely,

Micah J. Peters