

2026, the Commission issued a Notice of Filing and set an April 17, 2026 intervention deadline. SDLCG's intervention here is warranted for three reasons.

3. First, SDLCG's members consume large quantities of electricity and are among BHP's largest customers. Therefore, BHP's proposed rate increase would greatly increase SDCLG members' cost of doing business. SDLCG, therefore, has both a substantial and "peculiar" interest in the outcome of this proceeding compared to "the public or to the taxpayers in general."¹ Second, other intervenors would not adequately address SDLCG's interests. Indeed, no other large energy consumers have intervened in this proceeding. Third, SDLCG's intervention will not unduly broaden the issues in this proceeding, unduly prejudice other parties, or unduly disrupt the proceeding and is consistent with the public interest.

4. SDLCG is currently reviewing BHP's request and will further refine its position as the proceeding progresses.² However, at a high level, the SDLCG's position in this proceeding is that the Commission should only approve a rate increase if it is found to be just and reasonable.

5. SDLCG requests that it be served by electronic transmission with notice of matters relating to this proceeding and copies of all orders, pre-filed testimony, attachments, exhibits, pleadings, discovery, and other communications.

6. Service should be provided as follows:

James E. Moore
P.O. Box 5027
300 South Phillips Avenue, Suite 300
Sioux Falls, SD 57117-5027
Phone: (605) 336-3890
Fax: (605) 339-3357
Email: James.Moore@woodsfuller.com

¹ See ARSD 20:10:01:15.03, 20:10:01:15.05.

² See ARSD 20:10:01:15.03.

Austin Rueschhoff
Austin W. Jensen
Richard A. Arnett
Holland & Hart LLP
555 17th Street, Suite 3200
Denver, CO 80202
Tel: (303) 295-8000
Email: darueschhoff@hollandhart.com
awjensen@hollandhart.com
raarnett@hollandhart.com

And for Electronic Service Only:
aclee@hollandhart.com
tlfriel@hollandhart.com

Wherefore, SDLCG asks the Commission to grant SDLCG party status to protect its members' interest as affected customers and to ensure that it receives timely and appropriate information necessary for it to make decisions about its position in this proceeding.

Dated April 15, 2026.

WOODS, FULLER, SHULTZ & SMITH P.C.

By: /s/ James E. Moore
James E. Moore
P.O. Box 5027
300 South Phillips Avenue, Suite 300
Sioux Falls, SD 57117-5027
Phone: (605) 336-3890
Fax: (605) 339-3357
Email: James.Moore@woodsfuller.com

Austin Rueschhoff, *pro hac vice pending*
Austin W. Jensen, *pro hac vice pending*
Holland & Hart LLP
555 17th Street, Suite 3200
Denver, CO 80202
Tel: (303) 295-8000
Email: darueschhoff@hollandhart.com
awjensen@hollandhart.com

**ATTORNEYS FOR SOUTH DAKOTA LARGE
CUSTOMER GROUP**