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## SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

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May 8, 2009

Ms. Patricia VanGerpen  
PUC Executive Director  
500 E. Capital Ave  
Pierre, SD 57501

VIA E-FILING

RE: RM08-002

Dear Ms. Van Gerpen:

By way of follow-up, Staff submits comments in response to the Rules Hearing held on May 6, 2009.

Staff expressed a concern with Rule 20:10:36:54. Staff believes the exception for Tier 1 metering in the draft rules is a carryover from the Straw Man Oregon rules where net metering is allowed. This exception for Tier 1 results in only one meter for Tier 1 installations and as a result forces net metering. Staff therefore, recommends section 20:10:36:54 be reworded as noted below.

*20:10:36:54. Metering*

*The interconnection customer is responsible for the cost of the purchase, installation, operation, maintenance, testing, repair, and replacement of any special metering and data acquisition equipment considered necessary by the terms of the power purchase agreement. The public utility shall install, maintain, and operate the metering equipment. Parties shall be granted unrestricted access to the equipment as may be necessary for the purposes of conducting routine business.*

Staff discussed rule "20:10:36:55 Monitoring," with our expert and agrees with the utility comment the ability to monitor is important and necessary. Staff suggests the following rewording of 20:10:36:55

20:10:36:55. *Monitoring*

*Small generator facilities of less than 25 KW and approved and interconnected to the public utility under these interconnection rules are not required to provide for remote monitoring of the electric output by the public utility. Small generator facilities of 25 KW up to 250 KW and approved and interconnected to the public utility under these interconnection rules are required to provide data monitoring points. Small generator facilities of 250 KW and higher and approved and interconnected to the public utility under these interconnection rules are required to provide for remote monitoring of the electric output by the public utility. Data monitoring point costs shall be borne by the small generator facility and remote monitoring costs shall be borne by the public utility.*

A "data monitoring point" is a location where one or more sets of data would be made available, such as a PV system inverter that has kWh, peak power, power factor, voltage, etc. available for monitoring. The utility then has the option of connecting to the monitoring point to track and record data. Remote monitoring on the other hand is a system or the communications backbone necessary to transport the data and complete the communication.

Utilities must provide reliable service, and as a result must back up any distributed generator system. Utilities track generation supplies, transmission flow, and substation data very closely, and must have the ability to do so to guarantee reliable service. This issue simply did not come up at the workshops and as a result was not previously addressed by staff. Thank you for the opportunity to provide additional comment.

Sincerely,



Kara Semmler  
Staff Attorney