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December 14, 2009

Patricia Van Gerpen
SD Public Utilities Commission
500 E. Capitol Ave
Pierre, SD 57501

Re: Rule Making for Renewable, Recycled and Conserved Energy Objective Reporting

Ms. Van Gerpen:

With this filing, Staff requests the Commission open a rule making docket for the purpose of clarifying what data utilities shall report in accordance with SDCL 49-34A-101 through 106. Specifically, we believe rules should require that utilities submit the following data:

- Renewable generation capacity owned, by location
- Renewable generation capacity contracted for in PPAs, by location
- Total Capacity owned, by location
- Total Capacity contracted for in PPAs, by location
- RECs retired for South Dakota's RRCEO, by location
- RECs retired for other states, by state, by location
- A discussion of the utility's REC management viewpoint
- Retail sales in South Dakota
- Total retail sales across entire company footprint
- Amount of capital spent on energy efficiency programs
- Measured energy savings as a result of energy efficiency programs, if measurable
- Measured capacity savings as a result of energy efficiency programs, if measurable
- A general overview of the utility's attempts to incorporate renewable generation into the generation mix, including achievements and barriers to success.

Staff looks forward to additional rule making discussion.

Sincerely,

Brian P. Rounds
Staff Analyst