

December 21, 2015

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

RE: In the matter of the Consideration of Rules Regarding Stray Electrical Current and Voltage Remediation RM15-001

Dear Ms. Van Gerpen:

Thank you for the opportunity to submit comments on the South Dakota Public Utilities Commission's stray voltage rule-making docket, RM15-001. I am submitting these comments on behalf of the South Dakota Dairy Producers (SDDP). SDDP represents approximately 65% of all the cows on South Dakota dairy farms and about 70% of all the milk that is produced in South Dakota as well as the majority of allied dairy industry members of SDDP.

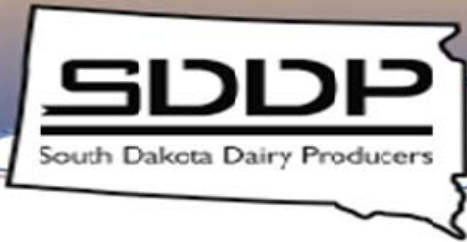
Unfortunately, SDDP did not receive any announcement in the mail of the docket being open and identifying a deadline date of December 11, 2015 for initial comments and the December 24, 2015 date for responsive comments. We recommend receiving comments on these draft rules prior to starting the formal rule making process. They can be sent to sddairyproducers@gmail.com.

SDDP is reviewing the proposed draft rules and will respond to any initial comments to meet the December 24, 2015 deadline date, (see below). SDDP will also reserve the right to make comments during the actual rule hearing.

As you are aware, SDDP was very active in the discussions leading up to the passage of stray voltage legislation in South Dakota (SDCL ch 49-47). SDDP was supportive of more favorable thresholds, specifically the level of 1 volt as the preventative action level. SDDP desired .5 V but it appears that will not change since the opposition was successful in getting it into statute. SDDP believes the rules can do a lot more to assist this costly complication that occurs mostly on dairy farms.

It appears that one could have 1.7V but if the portion attributable to the utility is only .4V they would not be required to take corrective measures.

SDDP appreciated the proactive nature of the REA's willingness to work with the local utilities to establish yearly baseline testing on each dairy farm in South Dakota. SDDP would like the commission to consider a rule that would require that to be done and results shared



with the local dairy farm user of their service. If the PUC's role is to look at the testing results and determine whether there is evidence of stray voltage and who is responsible, maybe there needs to be a basic service required to identify, and remediate as soon as possible before the problem gets worse.

Comments to Doug Jensen comments: SDDP would agree to add the water service line as an additional source of stray voltage to be tested.

Comments to NorthWestern Energy comments:

1. SDDP and its dairy farmer members would like to see the 48 hour testing sequence remain. Conditions that may cause stray voltage would be identified better over a longer period of time rather than a shorter period.
2. SDDP is not familiar with the proposal to modify the approach to the overall testing regime. On the surface it appears to be a cost saving approach. SDDP would like to hear input from other electricians and utilities.

Lastly, SDDP does not have any further comments at this time but looks forward to participating in the process.

Sincerely,

/s/Roger Scheibe
Roger Scheibe
Ex Dir - SDDP