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December 24, 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:

On December 11, 2015, South Dakota Rural Electric Association (“SDREA”) submitted comments to the South Dakota Public Utilities Commission (“Commission”) in the above referenced docket. SDREA has reviewed all comments files in the docket to date and provides these reply comments to comments submitted by other parties.

1. Xcel Energy Comments: In response to Xcel’s general comments in paragraph 1 (page 1), SDREA does not believe it is necessary to limit the measurement methodology exclusively to voltage measurements. The rules as proposed allow a utility the flexibility to use either voltage measurement or current measurement. Therefore, if the current measurement option is retained in the rules, it does not hinder a utility from using voltage readings. Accordingly, SDREA believes Xcel’s proposed revisions to 20:10:39:01(2), 20:10:39:28 and 20:10:10:39:30 are unnecessary.

SDREA concurs with Xcel’s recommendation to remove the formula in proposed rule 20:10:39:57 and would encourage discussion of developing a different formula to calculate the utility contribution.

With regard to other suggested revisions to the rules proposed by Xcel, SDREA comments as follows:

- a. The addition of “Vshunted” in 20:10:39:01(9) is not necessary;
- b. The proposed revision in 20:10:39:28 is not necessary;
- c. SDREA concurs with the proposed revisions to 20:10:39:51;
- d. In 20:10:39:57, the words “or cow contract current” should not be deleted; and
- e. SDREA concurs with striking the word “moist” in 20:10:39:22.

Robert C. Riter, Jr
Margo D. Northrup

Darla Pollman Rogers
Lindsey Riter-Rapp

Jerry L. Wattier
Robert D. Hofer, Of Counsel



2. Douglas Jensen Comments: SDREA does not object to addition of water service lines to be tested for stray voltage.

3. Northwestern Energy Comments: SDREA concurs with changing the testing period to 24 hours, and notes that the University of Wisconsin Stray Voltage procedures call for a 24 hour testing sequence. SDREA believes that the rules as drafted encompass a two-stage approach to the testing regime.

4. MidAmerican Energy Initial and Reply Comments: SDREA shares MidAmerican's concerns about what constitutes "Commission approved voltage training" and encourages further discussion of this issue. SDREA also concurs with MidAmerican's comments with regard to 20:10:39:22 and 20:10:39:25. SDREA does not agree with MidAmerican's concurrence with Xcel to limit measurement methodology to voltage measurements for the reasons stated above in response to Xcel's comments. Otherwise, SDREA concurs with MidAmerican's Reply Comments.

5. South Dakota Dairy Producer's Comments: SDREA does not support a requirement of annual testing for all dairies. SDREA also supports a 24 hour testing sequence, for the reasons stated above.

6. Otter Tail Comments: SDREA concurs with the comments submitted by Otter Tail.

SDREA looks forward to continuing to work with the Commission, Commission staff, and other interested parties in this rule-making proceeding. Thank you for the opportunity to comment. Please do not hesitate to contact me if you have any questions regarding SDREA's filings in this docket.

Sincerely yours,

RITER, ROGERS, WATTIER &
NORTHRUP, LLP

By:

A handwritten signature in cursive script that reads "Darla Pollman Rogers". The signature is written in dark ink and is positioned above the printed name.

Darla Pollman Rogers
Attorney for SDREA