May 31, 2022

Katelyn Lynch-Butcher, Attorney
MidAmerican Energy Co.
666 Grand Ave., Ste. 500
Des Moines, IA 50309

Travis Jacobson, Director of Regulatory Affairs
Montana-Dakota Utilities Co.
400 N. Fourth St.
Bismarck, ND 58501

Steve Kolbeck, Principal Manager
Northern States Power Co. dba Xcel Energy
PO Box 988
Sioux Falls, SD 57501

Kevin Kouba, Area Manager
Otter Tail Power Co.
PO Box 392
Milbank, SD 57252

RE: 2022 Summer readiness and request from the SDPUC’s May 24, 2022, meeting.

Dear Ms. Lynch-Butcher, Mr. Jacobson, Mr. Kolbeck and Mr. Kouba:

At the South Dakota Public Utilities Commission’s May 24, 2022, meeting the Commission asked MidAmerican Energy Co., Montana-Dakota Utilities Co., Xcel Energy and Otter Tail Power Co. to submit letters detailing whether they have sufficient resources to meet peak demand this summer.

Discussed below is a portion of the NERC Summer Reliability Assessment on MISO:

Expected resources do not meet operating reserve requirements under normal peak-demand and outage scenarios. Above-normal summer peak load and outage conditions could result in the need to employ operating mitigations (i.e., demand response and transfers) and EEAs. Load shedding may be needed under extreme peak demand and outage scenarios studied.
Normal summer conditions will likely need to utilize the early EEA stages to access the full pool of resources to meet demand. Involuntary firm load shed should only be expected with extreme scenarios.

The Commission is concerned about MISO’s recent announcement that it could be up to 5GW short during peak periods this summer. Unfortunately, if MISO is short South Dakota may be impacted by rolling blackouts, which of course are not acceptable. Our primary concern is that South Dakota’s regulated companies aren’t contributing to the potential problem.

The Commission wants to identify whether sufficient resources to meet peak demand this summer are in place.

NERC’s message has already been heavily publicized in South Dakota, and we want your assurance that you are maintaining adequate resources to avoid rolling blackouts.

Therefore, the Commission requests that South Dakota MISO utilities answer the following by June 14, 2022:

1. South Dakota’s MISO Utilities’ 2022 Summer Resource Readiness and Preseason Peak Plan
   A. Are South Dakota MISO utilities ready to reliably serve peak load for summer 2022? If so, please explain how.
   B. Do South Dakota MISO utilities participate in MISO’s emergency drills including the firm load shed drill?
   C. Do South Dakota MISO utilities have a comprehensive plan for firm load shed?
   D. How often do South Dakota MISO utilities update their firm load shed plans?
   E. Do South Dakota MISO utilities have any concern with MISO’s recent capacity auction result or are South Dakota MISO utilities taking any actions in response to the results?

Thank you for your prompt response.

Sincerely,

Chris Nelson
Chairman