



**Bakke
Grinolds
Wiederholt**

ATTORNEYS AT LAW

November 19, 2025

Via Hand-Delivery

Steve Kahl
Executive Secretary
North Dakota Public Service Commission
600 E. Boulevard Avenue, Dept. 408
Bismarck, ND 58505-0480

**Re: Montana-Dakota Utilities Co.
Wind Farm Station Service
Case No: PU-25-261**

Dear Mr. Kahl:

Enclosed for filing in Case No. PU-25-261, please find the following documents:

1. *Original Protest and Request for Hearing;*
2. *Original Declaration of Dale Nagel; and*
3. *Certificate of Service, with seven copies of same.*

Please do not hesitate to contact the undersigned if you have any questions about this filing.

Very Truly Yours,

Randall J. Bakke

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MDU Exhibit 2 - KEM Protest and Request
for Hearing Dated 11-19-25 (Dkt #10)

Montana-Dakota Utilities Co.



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Protest and Request for Hearing and
Declaration of Dale Nagel with Attachments

KEM Electric Coop Inc.
Randall J. Bakke, Attorney

STATE OF NORTH DAKOTA
PUBLIC SERVICE COMMISSION

Montana-Dakota Utilities Co.
Wind Farm Station Service – Wishek, ND
Public Convenience & Necessity

Case No: PU-25-261

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the following documents:

1. *Filing Letter to Steve Kahl from Randall Bakke dated November 19, 2025;*
2. *Protest and Request for Hearing; and*
3. *Declaration of Dale T Nagel (with Exhibits A-E).*

were on November 19, 2025, filed with the North Dakota Public Service Commission and served on the following:

Travis Jacobson (<i>Via Email & Certified Mail</i>)	ND Associations of REC's (<i>Via U.S. Mail</i>)
VP of Regulatory Affairs	P.O. Box 727
Montana-Dakota Utilities Co.	Mandan, ND 58554-0727
400 North 4 th Street	
Bismarck, ND 58501	
Travis.jacobson@mdu.com	
Cert. No. 7021 0950 0000 6796 4237	

Jeremy Fischer (*Via Email Only*)
Montana-Dakota Utilities Co.
Jeremy.Fischer@mdu.com

Dated this 19th day of November, 2025.

BAKKE GRINOLDS WIEDERHOLT

By: /s/ /Randall J. Bakke
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STATE OF NORTH DAKOTA
PUBLIC SERVICE COMMISSION

Montana-Dakota Utilities Co.
Wind Farm Station Service – Wishek, ND
Public Convenience & Necessity

Case No: PU-25-261

PROTEST AND REQUEST FOR HEARING

KEM Electric Cooperative, Inc. (“KEM”) through counsel, hereby protests the application of Montana-Dakota Utilities Co. for Permanent Authority to provide electric service to Badger Wind, LLC for wind farm station service at a site located in Section 8, Township 132N, Range 71W in McIntosh County, near Wishek, North Dakota. KEM is interested in this proceeding because the service location is within its service territory. KEM further requests the Public Service Commission to hold a hearing and authorize discovery in this matter pending a hearing. KEM’s reasons for requesting a hearing are outlined in the attached Declaration of Dale Nagel.

Dated this 19th day of November, 2025.

BAKKE GRINOLDS WIEDERHOLT

By: 

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