

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

**KEM ELECTRIC COOPERATIVE, INC.'S ANSWERS TO SECOND SET OF
DATA REQUESTS FROM MONTANA-DAKOTA UTILITIES CO.**

KEM Electric Cooperative, Inc. ("KEM Electric") hereby provides the following answers to *Montana-Dakota Utilities Co. Second Set of Data Requests to KEM Electric Cooperative, Inc.* dated June 23, 2026, subject to the below objections.

KEM Electric objects to the requests to the extent they request privileged and protected information, and information not calculated to lead to discovery of admissible evidence.

Multiple individuals, including management personnel, were involved in preparing this response. Primarily involved were Dale T. Nagel, KEM Line Superintendent and Chief of Staff, as well as Lee Keller, System Engineer with Innovative Energy Alliance Cooperative.

DATA REQUESTS

2.1 How much annual revenue does KEM expect to receive from servicing the load at issue?

Answer: This request is objected to as vague as what is meant by "annual revenue".

Without waiving the foregoing objections, at this time the exact revenue is unknown due to unavailable operating data.

2.2 How much in annual expenditures on transmission service does KEM expect to incur to serve the load at issue?

Answer: This request is objected to as vague as to what is meant by "annual expenditures".



Without waiving the foregoing objections, the cost from MISO for market participation, which is unknown at this time, is a cost used by Basin in our total cost of purchased power and not broken out separately as a cost to the cooperative. Therefore we will not incur any standalone transmission cost for service to this load.

2.3 What other costs and revenues not previously identified would also be included in KEM's service of the load at issue?

Answer: This request is objected to as vague as to what is meant by "costs and revenues".

Without waiving the foregoing objection, none.

2.4 What existing rate would KEM charge the load? Identify the appropriate rate schedule for service to the load at issue. Please provide a copy of such rate schedule or a link to where it is available electronically.

Answer: See attached Schedule IP-1 – Industrial Power effective 01/01/2026, bates stamped KEM148.

2.5 If KEM is unable to place a meter in the Wishek substation:

- a. What alternatives would KEM have for providing retail service to the load at issue?
- b. What would the capital upgrades cost KEM to serve the load at issue using the alternative plan in (a)?
- c. Would KEM expect to receive the same revenue from serving the load at issue in that scenario?

Answer: Alternatives were not identified due to access to an open access tariff facility.

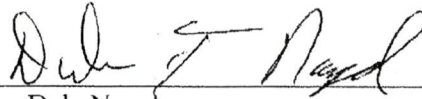
2.6 Does KEM have any other wind farm back up loads on its system? If so, how does it provide service to them?

Answer: No.

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Dated this 2nd day of July, 2026.

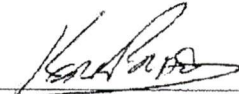
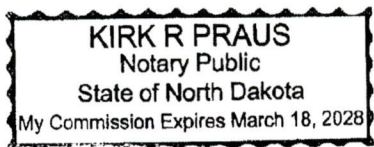
KEM Electric Cooperative



By: Dale Nagel

Its: Line Superintendent and Chief of Staff

Subscribed and sworn to before me this 2nd day of July, 2026.



Notary Public

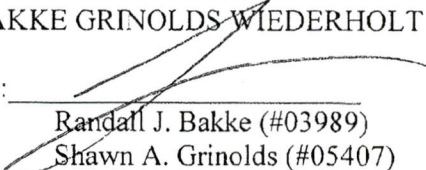
State of North Dakota

My Commission Expires: March 18 2028

All foregoing objections were made by counsel for KEM Electric Cooperative on its behalf.

Dated this 7th day of July, 2026.

BAKKE GRINOLDS WIEDERHOLT

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