I came across Docket EL 19-028 Black Hills Energy Deferred Accounting Request the other day. You are right ... I don't have much better to do than read PUC Dockets ... I guess. My first impression was that it smells a little like a company trying to deliberately evade the intent of PURPA. Buy up solar projects, kill them, and write them off. I know there is probably much more to this but, I thought I would ask if from the PUC's regulatory point of view, if they have a valid precedent to bring this? They must think so I guess or they wouldn't be trying. If you can't answer the question at this point, I understand. I also noted that after reading EL 18-038 BHE & Energy of Utah and the Consolidated Edison Docket that there seems to be a wide disparity in what BHE feels is the value of their avoided costs. Those calculations have always created suspicion because they are proprietary and the public doesn't get to see them unless they pinky swear that they won't tell. Complicated calculations done behind closed doors by companies who have a vested interest.... what could possibly go wrong? If you can offer any comments to help my confusion, I would appreciate them. Again, If you can't comment on an active Docket, I understand. The more I learn about the details and complexities of the the issues that the PUC deals with the happier I am that I don't have your job. I know I'm rambling so I'll shut up. Thanks for listening.

Regards,

Alan
Alan Anderson [redacted]
[redacted].
Rapid City, SD 57702