
From: South Dakota Public Utilities Commission

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Subject: General Information

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Comments: Regarding EL21-011: The BHP request presumes that solar customers are causing uncompensated cost-shifting to non-solar customers. This is the case if one factors in only the most obvious contributions to avoided cost (such as fuel savings), and disregards the other positive effects offered by QF's. These benefits, which are included in the numerous "value of solar" studies by other states often show that the solar customer is subsidizing his/her non-solar neighbor by providing the utility with decreased transmission and distribution losses, increased plant capacity, decreased MandO expense, current stability improvement, etc. This is without considering the very real health and environmental benefits to the entire customer base. South Dakota should not participate in this attempt to inhibit the development of distributed solar generation in the state