STATE OF SOUTH DAKOTA ) :SS COUNTY OF HUGHES )

IN CIRCUIT COURT SIXTH JUDICIAL CIRCUIT

In the Matter of Commission Staff's Petition for Declaratory Ruling Regarding Farm Tap Customers (NG 16-014) 32-CIV-17-71

**Statement of Additional Issues** 

NorthWestern Corporation d/b/a NorthWestern Energy ("NorthWestern") will address the issues raised by Northern Natural Gas Company ("Northern") in Northern's Statement of Issues, and raises the following additional issues:

- 1. Did the Public Utilities Commission err in its ruling in Docket No. NG16-014 on January 24, 2017, including when it ordered that (a) the Commission has jurisdiction over utilities providing natural gas to farm tap end users taking natural gas from the transmission line owned and operated by Northern and (b) NorthWestern is a public utility as defined by SDCL Chapter 49 with respect to the farm tap services?-
- 2. Did the Commission improperly deny NorthWestern's petition for reconsideration in its Order on March 20, 2017?

  Dated this 3rd day of April 2017.

/s/ Brendan V. Johnson

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