



Carol J. Halfhill
Paralegal
605-978-2853
carol.halfhill@northwestern.com

125 S. Dakota Avenue
Sioux Falls, SD 57104-6403
Telephone: 605-978-2908
Facsimile: 605-978-2910
www.northwestern.com

RECEIVED

November 1, 2004

NOV 03 2004

SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

Pamela Bonrud, Executive Director
S. D. Public Utilities Commission
500 East Capitol
Pierre, SD 57501

**Re: In the Matter of the Petition for Electrical Service by Dakota Turkey Growers, LLC
to Have Dakota Energy Cooperative, Inc. Assigned as its Electric Provider in the
Service Area of NorthWestern Energy; Docket No. EL04-032**

Dear Ms. Bonrud:

Enclosed please find an original and ten (10) copies of NorthWestern Corporation's Petition to Intervene and Objection. Please file this petition at your convenience.

Sincerely,

A handwritten signature in cursive script that reads "Carol Halfhill".

Carol Halfhill
Paralegal

Encs.

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**STATE OF SOUTH DAKOTA
BEFORE THE
PUBLIC UTILITIES COMMISSION**

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**SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION**

In the Matter of the Petition for Electrical Service)
by Dakota Turkey Growers, LLC to Have)
Dakota Energy Cooperative, Inc. Assigned as its)
Electric Provider in the Service Area of)
NorthWestern Energy)

Docket No. EL04-032

**PETITION TO INTERVENE
AND OBJECTION OF
NORTHWESTERN CORPORATION,
DOING BUSINESS AS
NORTHWESTERN ENERGY**

NorthWestern Corporation, doing business as NorthWestern Energy, hereby petitions to intervene as a party to this matter, pursuant to ARSD 20:10:01:15.02 and objects to the Petition of Dakota Turkey Growers, LLC (“Dakota Turkey Growers”) to have Dakota Energy Cooperative, Inc. (“Dakota Energy”) assigned as its electric supplier. In support of this Petition, NorthWestern states that the proposed site of Dakota Turkey Growers’ turkey processing plant (the “Plant”) in Beadle County (i) is within the exclusive assigned service territory of NorthWestern, (ii) NorthWestern has served the site continuously for many years, including service prior to March 21, 1975, (iii) NorthWestern has been serving the proposed site with both temporary electric service during the construction of the Plant and continued service to existing electrical equipment on the site, (iv) NorthWestern can and is willing to furnish an adequate and reliable electrical supply to the Plant with minimal construction of facilities, (v) NorthWestern has a combustion turbine generating plant of 65 MW capacity within one-half mile of the Plant site for additional reliability, and (vi) NorthWestern can furnish electrical service to the Plant

under favorable rates, based upon the Plant's qualification as a new electrical load for NorthWestern's system.

In response to the statements made in Dakota Turkey Growers' Petition for Electrical Service, NorthWestern states as follows:

- (a) NorthWestern agrees that the Plant will be east of Huron, South Dakota, on the south side of United States Highway 14;
- (b) NorthWestern agrees that the site of the Plant is within the assigned service area of NorthWestern;
- (c) NorthWestern agrees that the Dakota Energy office is on the north side of Highway 14, across from the Plant;
- (d) NorthWestern agrees that Dakota Turkey Growers will be a new customer, but NorthWestern does not agree that the Plant will be located at a new location, NorthWestern having served this geographical area for many years and continuing to serve it at the present time;
- (e) NorthWestern would like to obtain further information to confirm that the Plant will have a contracted minimum demand in excess of 2,000 kilowatts and to confirm several other statements in the Petition for Electrical Service and in the Affidavit of Joinder of Dakota Energy;
- (f) With regard to customer preference, Dakota Turkey Growers has expressed to NorthWestern its satisfaction with the electrical service plans that NorthWestern presented; and
- (g) NorthWestern is supplying electric service of the type required by the Plant within a mile of the Plant site, and NorthWestern believes that it can provide

service to the Plant in a cost-effective, reliable manner with less construction and installation of facilities.

As demonstrated in the Affidavit of Jay Morris attached to this Petition as Exhibit A, the opportunity to serve the Plant will benefit NorthWestern's system as a whole and NorthWestern's other customers.

NorthWestern and its customers will be directly affected by the issues raised in this proceeding and the outcome of the proceeding.

NorthWestern objects to the Dakota Turkey Growers petition. NorthWestern has not agreed for Dakota Energy to serve the customer in its assigned service area, and it seeks the opportunity to present evidence that NorthWestern is the more appropriate provider of electrical service to the Plant.

WHEREFORE, NorthWestern requests that the Commission grants its Petition and allow it to intervene and be granted status of a party to this proceeding.

Dated at Sioux Falls, South Dakota, this 1st day of November, 2004.

NORTHWESTERN CORPORATION,
doing business as NorthWestern Energy

By: 

Alan D. Dietrich
Michael P. DeVoe
Its Attorneys
125 S. Dakota Ave.
Sioux Falls, SD 57104
Ph. (605) 978-2908
Fax (605) 978-2910

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a an original and ten copies of this Petition to Intervene have been served by United States Postal Service first class mail, postage prepaid to Pamela Bonrud, Executive Director, S. D. Public Utilities Commission, 500 East Capitol, Pierre, SD 57501, and that a true and correct copy of this Petition to Intervene was served by United States Postal Service first class mail, postage prepaid to the following parties to this proceeding this 1st day of November, 2004:

Darla Pollman Rogers
Riter, Rogers, Wattier & Brown, LLP
P. O. Box 280
Pierre, SD 57501

Karen Cremer
S. D. Public Utilities Commission
500 East Capitol
Pierre, SD 57501

Sara Harens
S. D. Public Utilities Commission
500 East Capitol
Pierre, SD 57501



Michael P. DeVoe

STATE OF SOUTH DAKOTA
BEFORE THE
PUBLIC UTILITIES COMMISSION

In the Matter of the Petition for Electrical Service)
by Dakota Turkey Growers, LLC to Have)
Dakota Energy Cooperative, Inc. Assigned as its) Docket No. EL04-032
Electric Provider in the Service Area of)
NorthWestern Energy)

AFFIDAVIT OF JAY I. MORRIS

State of South Dakota)
) SS
County of Beadle)

Jay I. Morris, being first duly sworn upon oath, deposes and says that he is the Huron Area Operations Manager for NorthWestern Corporation, doing business as NorthWestern Energy ("NorthWestern") and makes this Affidavit for and on behalf of NorthWestern, who has filed a Petition to Intervene and Objection in this matter, and states:

(1) Based upon the information that NorthWestern has been provided by Dakota Turkey Growers, LLC ("Dakota Turkey Growers") for its Plant:

(a) NorthWestern has the ability and willingness to meet the electric service requirements of the Dakota Turkey Growers Plant;

(b) NorthWestern has the availability of adequate power supply for the Plant;

(c) Serving the Plant will assist NorthWestern in developing and improving its electric system, including benefits to NorthWestern's other customers;

(d) NorthWestern has adequate facilities, including a 65-megawatt combustion turbine generation plant, multiple 115-kilovolt electric transmission feeds into Huron and a 69-kilovolt electric transmission loop that can be switched around for redundancy, a 69-

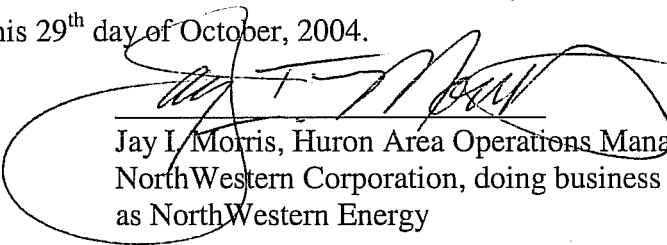
kilovolt to 25-kilovolt substation that will contain two substation transformers both capable of picking up the Dakota Turkey Grower's plant load, all this will feed an existing overhead 25-kilovolt 3Ø-4W circuit and a new underground 25-kilovolt 3Ø circuit that will act as the primary feed to the plant. NorthWestern will install an automatic rollover switch that will automatically switch to the other distribution feed if there is a loss of power, all this in addition to a new underground loop to four new padmount transformers and switches will provide the electric service of the type that will be required by the Plant;

(e) Despite the Petition for Electrical Service filed in this matter, Dakota Turkey Growers has expressed interest in being served by NorthWestern; and

(f) NorthWestern is ready, willing and capable of meeting all of Dakota Turkey Growers' electric and natural gas needs at the Plant, including any growth needs of the Plant.

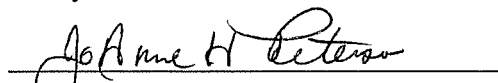
(2) NorthWestern has been serving the Plant site for many years, continues to serve this geographical area at the present time, and desires to continue to serve this location, as part of its rights and responsibilities within its assigned service area.

Dated at Huron, South Dakota, this 29th day of October, 2004.



Jay I. Morris, Huron Area Operations Manager
NorthWestern Corporation, doing business
as NorthWestern Energy

Subscribed and sworn to before me this 29th day of October, 2004.



JoAnne H. Peters

Notary Public, South Dakota

My Commission Expires: 5/29/2010



(Seal)