

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

IN THE MATTER OF THE APPLICATION)	JOINT MOTION FOR
OF NORTHWESTERN CORPORATION DBA)	APPROVAL OF <u>AMENDMENT</u>
NORTHWESTERN ENERGY FOR)	TO REVISED
AUTHORITY TO INCREASE ITS)	SETTLEMENT STIPULATION
ELECTRIC RATES)	
)	EL14-106

NorthWestern Corporation d/b/a NorthWestern Energy (NorthWestern), the South Dakota Public Utilities Commission Staff (Staff), Toshiba America Business Solutions, Inc., Trail King Industries, Inc., Redfield Energy, LLC, and Wal-Mart Stores, Inc. (collectively, the Parties), hereby file a Joint Motion for Approval of Amendment to Revised Settlement Stipulation with the South Dakota Public Utilities Commission (Commission). The Parties request that the Commission adopt the attached Amendment to Revised Settlement Stipulation. For clarity, the amendments to the Revised Settlement Stipulation are underlined within the Revised Settlement Stipulation.

By way of background, on November 4, 2015, the Commission issued an Order Granting Joint Motion for Approval of Revised Settlement Stipulation; Order Approving Interim Refund Plan in the above captioned docket. In Section III, paragraph 2., of the Revised Settlement Stipulation, it provides:

On or before October 1, 2018, NorthWestern will, at its option, file an electric general rate case or adjust the amount in base rates for Beethoven to the cost of service based on actual year 3 revenue requirements adjusted for known and measurable changes, using Staff's settlement cost of service model utilized in this rate case.

At the same time, NorthWestern will adjust the authorized revenue requirement for Beethoven for any differences between operations and maintenance expenses incurred in the operation of Beethoven and the estimated amounts used in establishing the amount in base rates. The net amount over collected or under collected from customers between October 1, 2015, and September 30, 2018, will be held in a regulatory asset until such time it is refunded or billed to customers (without interest) as a one-time separate line item amount on customer bills.

The Parties seek to amend the timing required by the Revised Settlement Stipulation to allow NorthWestern until January 1, 2019, to adjust the amount in base rates for Beethoven based on the actual year 3 revenue requirements for 12 months ending on September 30, 2018,

and to include any over or under collection in base rates between October 1, 2018, and December 31, 2018, in the regulatory asset provided for in the Revised Settlement Stipulation. Further, the Parties seek to preserve the benefit of the bargain in the Revised Settlement Stipulation and to provide for clarity regarding the effect of the lowered Federal Income Tax (FIT) rate on the Production Tax Credits (PTCs) associated with the Beethoven wind production, which are provided to customers through the Delivered Cost of Fuel adjustment clause. In addition, the Parties clarify that NorthWestern must adjust the PTCs included in the Delivered Cost of Fuel adjustment clause to reflect the actual FIT rate in effect.

In support of this Joint Motion, the Parties submit as follows:

1. This Joint Motion is made pursuant to ARSD 20:10:01:19.
2. The terms of the Amendment to Revised Settlement Stipulation agreed upon are just and reasonable and consistent with South Dakota law.

WHEREFORE, for the foregoing reasons, the undersigned Parties request the Commission to grant the Joint Motion for Approval of Amendment to Revised Settlement Stipulation and adopt the attached Amendment to Revised Settlement Stipulation without modification.

This Joint Motion for Approval of Amendment to Revised Settlement Stipulation may be signed by the Parties' representatives in counterparts.

NORTHWESTERN ENERGY

SOUTH DAKOTA PUBLIC UTILITIES
COMMISSION STAFF

BY: _____

BY: _____

ITS: _____

ITS: Staff Attorney

DATE: _____

DATE: _____

TOSHIBA AMERICA BUSINESS
SOLUTIONS, INC.

WAL-MART STORES, INC.

BY:  _____

BY: _____

ITS: Attorney

ITS: _____

DATE: 9-9-18

DATE: _____

REDFIELD ENERGY, LLC

BY: 

ITS: Attorney

DATE: 9-9-18

TRAIL KING INDUSTRIES, INC

BY: 

ITS: Attorney

DATE: 9-9-18

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NORTHWESTERN ENERGY

SOUTH DAKOTA PUBLIC UTILITIES
COMMISSION STAFF

BY: 

BY: _____

ITS: Director – Corporate Counsel

ITS: Staff Attorney

DATE: 9/8/2018

DATE: _____

TOSHIBA AMERICA BUSINESS
SOLUTIONS, INC.

WAL-MART STORES, INC.

BY: _____

BY: _____

ITS: _____

ITS: _____

DATE: _____

DATE: _____

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NORTHWESTERN ENERGY

BY: _____

ITS: _____

DATE: _____

TOSHIBA AMERICA BUSINESS SOLUTIONS, INC.

BY: _____

ITS: _____

DATE: _____

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION STAFF

BY: Amanda Reiss

ITS: Staff Attorney

DATE: 9-10-2018

WAL-MART STORES, INC.

BY: _____

ITS: _____

DATE: _____

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NORTHWESTERN ENERGY

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ITS: _____

DATE: _____

TOSHIBA AMERICA BUSINESS SOLUTIONS, INC.

BY: _____

ITS: _____

DATE: _____

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION STAFF

BY: _____

ITS: Staff Attorney

DATE: _____

WAL-MART STORES, INC.

BY:  _____

ITS: Attorney at Record

DATE: 9/2/18