

October 1, 2015

Public Utilities Commission
Capitol Building 1st Floor
500 E. Capitol Ave.
Pierre, SD 57501

Re: Aberdeen Housing Authority Request for Mastermetering Variance

Pursuant to SDAR 20:10:26:05 we are requesting, on behalf of Aberdeen Housing Authority, a variance to the separate metering requirement in SDAR 20:10:26:03(4).

The project for which a variance is requested is a 40 unit multi-family housing structure designed to provide affordable senior housing to the community of Aberdeen. We have submitted an application for LIHTC/HOME funds and if awarded intend to begin construction early in 2016. Lloyd Companies is providing planning, design, construction, and management services and make this request on behalf of our client. We are requesting to master meter the project for electrical and gas services.

The project, if awarded, will be located between South Merton Street and Melgaard Road in Aberdeen, South Dakota.

The appropriate utility companies have been copied on this letter, pursuant to SDAR 20:10:26:05. No hearing is requested by Aberdeen Housing Authority.

(1) Type of Project

We are building a multi-family housing structure to provide affordable senior housing to the community. It includes 40 units in total.

(2) Justification

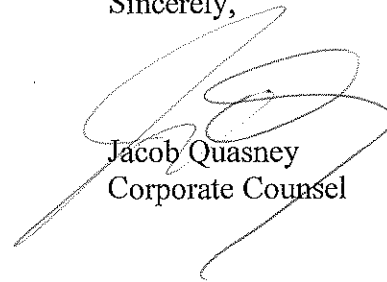
Under the lease structure on this project, the Landlord is going to pay all utilities. Therefore, separate metering would create an additional up front cost to construction and would create an additional administrative burden. Further, the property is going to be equipped with a central domestic hot water heating system which will service the entire facility.

The central domestic hot water heating system brings the project within the scope of SDAR 20:10:26:04(6), which provides an exception for multi-occupancy buildings providing central

systems to the building. The design and character of the project within the scope of an exception to master metering requirements and the additional up front and continued expense of separately metering the project make it most appropriate to master meter this project for all utilities.

If you have any questions, comments, or concerns. Please contact me. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Quasney', is written over the printed name and title.

Jacob Quasney
Corporate Counsel

CC: NorthWestern Energy