BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE
COMPLAINT BY CONSOLIDATED
EDISON DEVELOPMENT AGAINST
NORTHWESTERN CORPORATION
DBA NORTHWESTERN ENERGY FOR
ESTABLISHING A PURCHASE
POWER AGREEMENT

JOINT REQUEST FOR EXTENSION OF PPA ORDER DEADLINE

EL16-021

Comes now NorthWestern Corporation d/b/a NorthWestern Energy ("NorthWestern") and Consolidated Edison Development, Inc. ("CED") and request the South Dakota Public Utilities Commission ("Commission") grant NorthWestern and CED an extension of the deadline to complete power purchase agreement negotiations. In support hereof, NorthWestern and CED state as follows:

- 1. By Order dated December 20th, 2017, the Commission ordered CED and NorthWestern to enter into negotiations in good faith to consummate a power purchase agreement consistent with the Findings of fact and Conclusions of Law no later than thirty (30) days following the issuance of the Order.
- 2. Negotiations are ongoing, and the parties are working to resolve a few remaining contractual issues. The parties believe an additional 21 days will be sufficient to finalize the three project power purchase agreements.

WHEREFORE, NorthWestern and CED request that the Commission grant this request for extension of the deadline.

Dated January 22, 2018.

NORTHWESTERN CORPORATION, d/b/a NORTHWESTERN ENERGY

Jonathan M. Oostra

Al Brogan

3010 West 69th Street Sioux Falls, SD 57108 Phone: (605) 978-2940

jon.oostra@northwestern.com

Attorney for NorthWestern Corporation

d/b/a NorthWestern Energy

Dated January 22, 2018.

TAYLOR LAW FIRM

William Taylor

John E. Taylor 4820 E. 57th Street

Sioux Falls, SD 57108

Phone: (605) 782-5304

bill.taylor@taylorlawsd.com

Michael Uda

UDA LAW FIRM P.C.

7 West 6th Avenue

Power Block West, Suite 4H

Helena, MT 59601

Phone: (406) 457-5311

michaeluda@udalaw.lcom

Attorneys for Consolidated Edison Development, Inc.

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on the 22nd day of January, 2018, a true and correct copy of the foregoing, **JOINT REQUEST FOR EXTENSION OF PPA DEADLINE**, was served on the following via electronic mail:

Ms. Patricia Van Gerpen
Executive Director
South Dakota Public Utilities Commission
500 E. Capitol Ave.
Pierre, SD 57501
Patty.vangerpen@state.sd.us
(605) 773-3201- voice

Ms. Kristen Edwards
Staff Attorney
South Dakota Public Utilities Commission
500 E. Capitol Ave.
Pierre, SD 57501
Kristen.edwards@state.sd.us
(605) 773-3201- voice

Ms. Amanda Reiss
Staff Attorney
South Dakota Public Utilities Commission
500 E. Capitol Ave.
Pierre, SD 57501
Amanda.reiss@state.sd.us
(605) 773-3201- voice

Mr. Darren Kearney
Staff Analyst
South Dakota Public Utilities Commission
500 E. Capitol Ave.
Pierre, SD 57501
Darren.kearney@state.sd.us
(605) 773-3201- voice

Mr. Joseph Rezac Staff Analyst South Dakota Public Utilities Commission 500 E. Capitol Ave. Pierre, SD 57501 Joseph.rezac@state.sd.us (605) 773-3201- voice

Mr. Jon Thurber
Staff Analyst
South Dakota Public Utilities Commission
500 E. Capitol Ave.
Pierre, SD 57501
Jon.thurber@state.sd.us
(605) 773-3201- voice

Mr. Michael Uda – Representing: Juhl Energy, Inc. and Consolidated Edison Development, Inc. 7 W. Sixth Ave.

Power Block West, Ste. 4H

Helena, MT 59601

michaeluda@udalaw.com

(406) 457-5311 – voice

William Taylor – Representing: Juhl Energy, Inc. and Consolidated Edison Development, Inc. Attorney
Taylor Law Firm, LLC
2921 E. 57th Street
Mailbox 10
Sioux Falls, SD 57108
Bill.taylor@taylorlawsd.com
(605) 212-1750 – cell
(605) 782-5304 – voice

Mr. John E. Taylor - Representing: Juhl Energy, Inc. and Consolidated Edison Development, Inc.

Attorney
Taylor Law Firm, LLC
2921 E. 57th Street
Mailbox 10
Sioux Falls, SD 57108
john.taylor@taylorlawsd.com
(605) 782-5304 - voice

Mr. Corey Juhl
VP of Project Development
Juhl Energy, Inc.
1502 17th St. SE
Pipestone, MN 56164
juhlc@coneddev.com

Ms. Pamela Bonrud
Director Government and Regulatory Affairs
NorthWestern Energy
3010 West 69th St.
Sioux Falls, SD 57108
Pam.bonrud@northwestern.com
(605) 978-2990 – voice
(605) 978-2910 – fax

Mr. Al Brogan
Corporate Counsel
NorthWestern Energy
Ste. 205
208 N. Montana Ave.
Helena, MT 59601
Al.brogan@northwestern.com
(406) 443-8903 – voice

Mr. Jonathan M. Oostra Corporate Counsel NorthWestern Energy 3010 West 69th St. Sioux Falls, SD 57108 Jon.oostra@northwestern.com

Mr. Bleau LaFave
Director Long-Term Resources
NorthWestern Energy
3010 West 69th St.
Sioux Falls, SD 57108
Bleau.lafave@northwestern.com
(605) 978-2897 – voice

NORTHWESTERN CORPORATION d/b/a NORTHWESTERN ENERGY

Jonathan M. Oostra

Al Brogan