BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE COMPLAINT OF : Docket No.-El-16-021

CONSOLIDATED EDISON DEVELOPMENT,

INC., AGAINST NORTHWESTERN

CORPORATION d/b/a NORTHWESTERN

ENERGY REGARDING AVOIDED COST : AFFIDAVIT OF COREY JUHL

AND FOR THE BRULE COUNTY, WIND, LLC, AURORA COUNTY WIND, LLC, AND DAVISON COUNTY WIND, LLC PROJECTS

STATE OF MINNESOTA)

:SS

COUNTY OF PIPESTONE)

Corey Juhl, having first been sworn on oath, deposes and says.

- 1. I am the Director of Development for Consolidated Edison Development, Inc.
- 2. After considerable study and analysis, Consolidated Edison Development made the business decision to accept NorthWestern's proposed August 23, 2017, levelized avoided cost rate of \$26.91 per megawatt hour based a legally enforceable obligation date of June 23, 2016, which includes payment for capacity, NorthWestern's recapture of interconnection upgrade costs, and regulation expense, but does not include renewable energy credits, which will remain with Consolidated Edison Development, Inc.
- 3. Consolidated Edison Development's acceptance of the avoided cost rate is conditioned on the case being economically concluded without findings of fact, conclusions, of law, or further proceedings.

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4. Consolidated Edison Development's decision to accept the avoided cost rate if a matter of business exigency and is not an admission that Northwestern' approach to and methodology for calculating avoided cost is correct. Consolidated Edison Development continues to believe that the methodology and inputs that Northwestern used to calculate the avoided cost rate are inappropriate, discriminatory, and inconsistent with PURPA and FERC correctives.

Dated this 30th day of November, 2017.

Corey Juhl

Stated and sworn before me

this 30th day of November 2017.

Notary Public -

(SEAL)

TEENA FREDERICK

SEAL NOTARY PUBLIC SEAL SOUTH DAKOTA

My Commission Expires October 30, 2021

Certificate of Service

I hereby certify that on the <u>70</u> day of <u>Nw</u>, 2017, I served via email a true and correct copy of the Affidavit of Corey Juhl on the following:

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By William Taylor
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