BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE COMPLAINT OF : CONSOLIDATED EDISON DEVELOPMENT, INC., AGAINST NORTHWESTERN : CORPORATION d/b/a NORTHWESTERN ENERGY REGARDING AVOIDED COST : AND FOR THE BRULE COUNTY, WIND, LLC, AURORA COUNTY WIND, LLC, AND : DAVISON COUNTY WIND, LLC PROJECTS Docket No.-El-16-021

MOTION FOR ENTRY OF ORDER CONCLUDING CASE

Comes now Consolidated Edison Development, Inc., and respectfully moves the Commission for an order, substantially in the form hereto attached, memorializing Consolidated Edison Development's acceptance of NorthWestern's August 23, 2016, avoided cost rate of \$26.91 per megawatt hour based on a legally enforceable obligation date of June 23, 2016.

This motion is conditioned on the Commission entering an order substantially in the form

attached hereto, and that there be no further proceedings in the case.

In the event the Commission does not grant the relief herein requested, Consolidated

Edison Development reserves the right to withdraw the motion, and to file further motions

requesting the Commission reopen the record and allow further evidence with respect to

- (a) Payments for capacity and the calculation thereof;
- (b) Integration regulation costs;
- (c) Charges for and the recovery of interconnection costs;

(d) The discount rate used by NorthWestern in its levelization of the avoided cost rate, and

(e) The so-called Long 2 and Long 3 circumstances and such other matters as may be appropriately brought before the Commission.

Consolidated Edison Development prays the Commission set this motion for hearing, and

being fully advised of the premises, grant the relief herein requested.

Dated this 30th day of November, 2017.

TAYLOR LAW FIRM

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Attorneys for Consolidated Edison Development, Inc.

Case Number: Docket No. EL 16-021 Motion for Entry of Order Concluding Case

Certificate of Service

I hereby certify that on the 30th day of November, 2017, I served via email a true and

correct copy of Motion for Entry of Order Concluding Case on the following:

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