



October 1, 2018

via eFiling

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street N.E.
Washington, DC 20426

Re: *NorthWestern Corporation (South Dakota)*, Docket No. ER19-___-000
Re-filing of Existing Tariff Records to New Tariff ID
New Baseline | South Dakota OATT, Tariff ID 39
Type of Filing Code: 390

ER19-12-000

Dear Secretary Bose:

Pursuant to Section 205 of the Federal Power Act¹ and Part 35 of the Federal Energy Regulatory Commission's regulations,² NorthWestern Corporation d/b/a NorthWestern Energy hereby submits for filing and acceptance an administrative filing to migrate the tariff records currently filed under Tariff ID 28, NorthWestern Corporation – Electric Utility, to new Tariff ID 39, South Dakota OATT. This migration filing does not substantively alter NorthWestern's tariffs, service agreements, or rate schedules. As discussed in more detail below, this filing is the third of several filings to migrate NorthWestern's tariff records to a new tariff structure.³

In order to provide certainty that this migration results in a clear succession of existing tariff records to new tariff records in the FERC eTariff system, NorthWestern respectfully requests waiver of the prior notice requirement and an October 2, 2018 effective date for this filing.

I. Background

A. Description of NorthWestern

NorthWestern is a public utility engaged in the generation, transmission, and distribution of electricity and the supply and transportation of natural gas. Its facilities are located primarily in

¹ 16 U.S.C. § 824d.

² 18 C.F.R. Part 35 (2018).

³ Migration filings have been submitted in Docket Nos. ER18-2511-000 (Market Based Rate Tariff) and ER18-2519-000 (Reserve Energy Service).



Montana and South Dakota. In South Dakota, NorthWestern is a transmission owner within the Southwest Power Pool, Inc. and has transferred functional control of a large portion of its electric transmission facilities there to SPP. In Montana, NorthWestern is a transmission owner/operator and Balancing Authority Area operator within the Western Electricity Coordinating Council.

NorthWestern's Montana and South Dakota transmission facilities are not physically connected and are not in the same electric reliability region. Accordingly, NorthWestern maintains separate open access transmission tariffs (OATT) for operations in each state. In addition, NorthWestern is authorized to sell wholesale power at market-based rates.

B. NorthWestern's Baseline Electronic Tariff Filings

On September 29, 2010, NorthWestern submitted a filing to establish its baseline electronic tariff, in compliance with Order No. 714.⁴ NorthWestern's submission included its South Dakota OATT (Record ID 1), its Montana OATT (Record ID 63), and its market-based rate (MBR) tariff (Record ID 128).⁵ On December 1, 2011, NorthWestern submitted for filing a baseline of its then-effective Reserve Energy Service Tariff (Record ID 230).⁶ These tariffs were all filed under Tariff ID 28, NorthWestern Corporation – Electric Utility. In addition, NorthWestern has filed individually negotiated rate schedules and agreements under Tariff ID 28.

II. Description of Migration Filings

A. Basis for New Tariff IDs

Since establishing its baseline electronic tariff in 2010, NorthWestern has made hundreds of eTariff filings. Most of the individually negotiated agreements have been filed under the Montana OATT (Record ID 63), resulting in numerous child and grandchild tariff records being inserted between the Montana OATT and the MBR Tariff (Record ID 128). The eTariff software used by NorthWestern automatically assigns Record IDs and Collation Values to each tariff record. Over time, because of the high number of records being inserted, the software's algorithm began assigning the same Collation Value to different tariff records.

⁴ *Electronic Tariff Filings*, 124 FERC ¶ 61,270 (2008).

⁵ *NorthWestern Corp.*, ER10-3171-000 (Nov. 23, 2010) (delegated letter order) (accepting baseline OATTs, effective September 29, 2010). The baseline MBR Tariff was overcome by events (OBE) by revisions filed in, and accepted by the Commission, Docket No. ER11-1858-000.

⁶ *NorthWestern Corp.*, ER12-504-000 (Jan. 18, 2012) (delegated letter order) (accepting baseline Reserve Energy Service Tariff, effective December 1, 2011).



NorthWestern discovered this issue after being asked by FERC staff to resubmit tariff records that were part of a filing but did not appear on eTariff.⁷ While working to resolve that issue, NorthWestern discovered several instances where the Collation Value had been duplicated. This has resulted in many lost child and grandchild tariff records on eTariff. After working with the eTariff vendor, NorthWestern determined that the best course of action would be to file a new baseline tariff.

B. New Electronic Tariff Structure

NorthWestern's current electronic tariff structure with all tariff records under one Tariff ID has been difficult to manage. The number of records combined with inconsistent naming practices in the early years of eTariff filings make it difficult to navigate. This is contrary to the Commission's goal of providing easy access to a company's tariffs. In addition, having two OATTs filed under one Tariff ID creates unnecessary confusion. Therefore, NorthWestern proposes the following new electronic tariff structure:

Tariff ID	Name
37	Market Based Rate Tariff
38	Reserve Energy Service
39	South Dakota OATT
41	Montana OATT
42	Other Rate Schedules

This organized structure will be easier for the Commission, its staff, and the public to navigate, and easier for NorthWestern to maintain.

C. No Changes to Tariff Language

This migration filing does not include changes to any tariff, service agreement, or rate schedule on file with the Commission. NorthWestern is reorganizing its existing tariff records under Tariff ID 28 into five discrete Tariff IDs. This will change the metadata, but it will not alter the content of NorthWestern's tariffs.⁸ NorthWestern is not proposing any changes to its tariff language in this migration filing. All tariff language will be migrated to the new Tariff IDs exactly as it appears in the existing Tariff ID. In addition, this migration filing will not have any impact on customer rights — substantive or procedural.

⁷ See Amendment of Pending Tariff Filing submitted in Docket No. ER17-2146-001.

⁸ For its rate schedules and service agreements, NorthWestern has updated the Tariff Record Title field as necessary to follow NorthWestern's current naming convention of "SA [or RS] XXX – [Type of Agreement] with [Counterparty Name.]"



D. Migration Filings

To facilitate the migration to the new tariff structure, NorthWestern will submit several filings to establish the new Tariff IDs and migrate the currently effective tariff records. NorthWestern will submit separate filings for each new Tariff ID as follows:

- NorthWestern submit a filing with Type of Filing Code 390 to establish each new Tariff ID. Each Type-390 filing will be submitted under Program Code E – FPA Electric (Traditional Cost of Service and Market Based Rates) Public Utility for the Organization NorthWestern Corporation (Federal Power Act).
- After all the effective tariff data has been filed under a new Tariff ID, NorthWestern will cancel the corresponding Records IDs under Tariff ID 28 using Type of Filing Code 260.⁹
- Finally, NorthWestern will cancel Tariff ID 28 using Type of Filing Code 410.

This process is consistent with the accepted procedures for managing and changing tariff data bases posting on the Commission's website.¹⁰

E. Pending Tariff Records

Only Tariff Record versions that are both accepted and effective are being migrated to new Tariff IDs at this time. There are no tariff records with a pending status to be migrated to Tariff ID 39.

F. Pending Cancellations

NorthWestern thoroughly reviewed its tariff records to develop the new tariff structure and prepare for this migration filing. In doing so, NorthWestern identified a handful of tariff records that could be canceled. NorthWestern has submitted a separate filing with Type of Filing Code 260 to cancel these existing records under Tariff ID 28.¹¹ Because these records are pending cancellation, NorthWestern is *not* migrating them to new Tariff IDs.

⁹ Because of the number of records to be migrated, NorthWestern anticipates the filings will take multiple days. Therefore, NorthWestern plans to migrate one set of records at a time — *i.e.*, submit the Code-390 filing to establish Tariff ID 37 for the MBR Tariff; then cancel Record ID 128; submit the Code-390 filing to establish Tariff ID 38 for the Reserve Energy Service Tariff; then cancel Record ID 230; *et cetera*.

¹⁰ See FERC Staff's Responses to Discussion Questions, p. 63, *et seq.*

¹¹ This cancellation filing was submitted in Docket No. ER19-3-000.



III. Proposed Effective Date & Request for Waiver

Pursuant to 18 C.F.R. § 35.11, NorthWestern respectfully requests waiver of the prior notice filing requirement under 18 C.F.R. § 35.3 to permit an effective date of October 2, 2018, for this filing. Good cause exists to waive the prior notice requirement because NorthWestern is not submitting revisions to any tariff, service agreement, or rate schedule on file with the Commission as part of this proceeding; rather, NorthWestern is migrating existing tariff records to a new Tariff ID. Thus, waiver will minimize the complexity of tracking tariff filings that bridge the effective dates of the existing and new Tariff IDs.

To the extent necessary, NorthWestern respectfully requests waiver of any other requirements under Part 35 necessary for acceptance of this filing. Specifically, NorthWestern is not submitting any cost support materials or price index criteria, as those materials were submitted when the tariff, service agreement, or rate schedule was originally filed with and accepted by the Commission. In addition, because is not proposing any changes to the existing tariff records, NorthWestern is not submitting marked versions of the tariff records.

IV. Contents of Filing

This filing establishes new Tariff ID 39 and includes the following documents:

- 1) This transmittal letter;
- 2) Attachment A, list of tariff records being migrated from existing Tariff ID 28 to new Tariff ID 39;
- 3) Clean tariff records for posting on eLibrary; and
- 4) Electronic filing package containing the tariff records and associated metadata to be migrated to new Tariff ID 39.

V. Service

NorthWestern Energy will provide a copy of its migration filings to each affected customer, the Montana Public Service Commission, the South Dakota Public Utilities Commission, and the Southwest Power Pool, Inc. In addition, this filing will be posted on NorthWestern's OASIS.¹² Copies are also available for public inspection at NorthWestern Energy's Corporate Office, 3010

¹² <http://www.oatioasis.com/NWMT/index.html>



West 69th Street, Sioux Falls, South Dakota, and the Montana General Office, 11 East Park, Butte, Montana.

VI. Communications

Communications concerning this filing should be directed to the following persons, who should be included on the official service list compiled by the Secretary in this proceeding:

Michael Cashell
Vice President – Transmission
NorthWestern Energy
11 East Park
Butte, MT 59701
Phone: (406) 497-4575
michael.cashell@northwestern.com

M. Andrew McLain
Director – Transmission Market Strategy &
FERC Compliance Officer
NorthWestern Energy
392 Gallatin Park Drive
Bozeman, MT 59771
Phone: (406) 443-8987
andrew.mclain@northwestern.com

VII. Conclusion

For the foregoing reasons, NorthWestern respectfully requests the Commission to accept this migration filing to establish Tariff ID 39 with an effective date of October 2, 2018.

Respectfully submitted,

s/ *M. Andrew McLain*

M. Andrew McLain

Director – Transmission Market Strategy & FERC Compliance Officer

andrew.mclain@northwestern.com

○ 406-443-8987



Certificate of Service

I hereby certify that I will serve the foregoing document upon each person designated in the foregoing transmittal letter, in accordance with Rule 2010 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.2010.

Dated this 1st day of October, 2018.

s/ Dori Quam

Dori Quam

Lead – Transmission Regulatory Support

dori.quam@northwestern.com

New Tariff ID: 39

Tariff Title: South Dakota OATT

Program Code: E - Federal Power Act Electric (Traditional Cost of Service and Market Based Rates)

Organization: NorthWestern Corporation (Federal Power Act)

Existing Tariff ID 28			New Tariff ID 39		
Existing Section Title	Record ID	Parent ID	New Section Title	New Record ID	Parent ID
FERC Open Access Transmission Tariff Vol. 2	1	N/A	NWE South Dakota OATT	3505	N/A
Table of Contents	2	1	Table of Contents	3506	3505
Definitions	3	1	Sec 1 - Definitions	3507	3505
Initial Allocation and Renewal Procedures	4	1	Sec 2 - Initial Allocation and Renewal Procedures	3508	3505
Ancillary Services	5	1	Sec 3 - Services	3509	3505
Open Access Same-Time Information System	6	1	Sec 4 - Open Access Same Time Information System	3510	3505
Local Furnishing Bonds	7	1	Sec 5 - Local Furnishing Bonds	3511	3505
Reciprocity	8	1	Sec 6 - Reciprocity	3512	3505
Billing and Payment	9	1	Sec 7 - Billing and Payments	3513	3505
Accounting for the Transmission Provider's Use of the Tariff	10	1	Sec 8 - Accounting for Transmission Providers Use of Tariff	3514	3505
Regulatory Filings	11	1	Sec 9 - Regulatory Filings	3515	3505
Force Majeure and Indemnification	12	1	Sec 10 - Force Majeure	3516	3505
Creditworthiness	13	1	Sec 11 - Creditworthiness	3517	3505
Dispute Resolution Procedures	14	1	Sec 12 - Dispute Resolution Procedures	3518	3505
Point-to-Point (PTP) Transmission Service -- Preamble	15	1	Part II - Point To Point (PTP) Transmission Service	3519	3505
Nature of Firm Point-To-Point Transmission Service	16	1	Sec 13 - Nature of Firm PTP Transmission Service	3520	3505
Nature of Non-Firm Point-To-Point Transmission Service	17	1	Sec 14 - Nature of Non Firm PTP Transmission Service	3521	3505
Service Availability	18	1	Sec 15 - Service Availability	3522	3505
Transmission Customer Responsibilities	19	1	Sec 16 - Transmission Customer Responsibilities	3523	3505
Procedures for Arranging Firm PTP Transmission Service	20	1	Sec 17 - Procedures for arranging Firm PTP Transmission	3524	3505
Procedures for Arranging Non-Firm PTP Transmission Service	21	1	Sec 18 - Procedures for arranging Non Firm PTP Transmission	3525	3505
Additional Study Procedures Firm PTP Transmission Requests	22	1	Sec 19 - Additional Study Procedures for Firm PTP TSRs	3526	3505
Procedures if Provider Unable to Complete New Facilities	23	1	Sec 20 - Procedures if TP Unable to Complete New Facilities	3527	3505
Provisions for Construction & Services on Other Systems	24	1	Sec 21 - Provisions for Construction on Other Systems	3528	3505
Changes in Service Specifications	25	1	Sec 22 - Changes in Service Specifications	3529	3505
Sale or Assignment of Transmission Service	26	1	Sec 23 - Sale or Assignment of Transmission Service	3530	3505

New Tariff ID: 39

Tariff Title: South Dakota OATT

Program Code: E - Federal Power Act Electric (Traditional Cost of Service and Market Based Rates)

Organization: NorthWestern Corporation (Federal Power Act)

Existing Tariff ID 28			New Tariff ID 39		
Existing Section Title	Record ID	Parent ID	New Section Title	New Record ID	Parent ID
Meter & Power Factor Correction at Receipt/Delivery Point(s)	27	1	Sec 24 - Metering and Power Factor Correction	3531	3505
Compensation for Transmission Service	28	1	Sec 25 - Compensation for Transmission Service	3532	3505
Stranded Cost Recovery	29	1	Sec 26 - Stranded Cost Recovery	3533	3505
Compensation for New Facilities and Redispatch Costs	30	1	Sec 27 - Compensation for New Facilities and Redispatch Cost	3534	3505
Network Integration Transmission Service -- Preamble	31	1	Part III - Network Integration Transmission Service (NITS)	3535	3505
Nature of Network Integration Transmission Service	32	1	Sec 28 - Nature of Network Integration Transmission Service	3536	3505
Initiating Service	33	1	Sec 29 - Initiating Service	3537	3505
Network Resources	34	1	Sec 30 - Network Resources	3538	3505
Designation of Network Load	35	1	Sec 31 - Designation of Network Load	3539	3505
Additional Procedures Network Transmission Service Requests	36	1	Sec 32 - Additional Study Procedures for NITS Requests	3540	3505
Load Shedding and Curtailments	37	1	Sec 33 - Load Shedding and Curtailments	3541	3505
Rates and Charges	38	1	Sec 34 - Rates and Charges	3542	3505
Operating Arrangements	104	1	Sec 35 - Operating Arrangements	3543	3505
Scheduling, System Control and Dispatch Service	39	1	Sch 1 - Scheduling System Control and Dispatch Service	3544	3505
Reactive Supply/Voltage Control from Generation Sources	40	1	Sch 2 - Reactive Supply and Voltage Control	3545	3505
Regulation and Frequency Response Service	41	1	Sch 3 - Regulation and Frequency Response Service	3546	3505
Energy Imbalance Service	42	1	Sch 4 - Energy Imbalance Service	3547	3505
Operating Reserve - Spinning Reserve Service	43	1	Sch 5 - Operating Reserve - Spinning Reserve Service	3548	3505
Operating Reserve - Supplemental Reserve Service	44	1	Sch 6 - Operating Reserve - Supplemental Reserve Service	3549	3505
Long-Term Firm and Short-Term Firm PTP Transmission Service	45	1	Sch 7 - Firm Point to Point Transmission Service	3550	3505
Non-Firm Point-To-Point Transmission Service	46	1	Sch 8 - Non Firm Point to Point Transmission Service	3551	3505
Generator Imbalance Service	47	1	Sch 9 - Generator Imbalance Service	3552	3505
Form of Service Agreement Firm PTP Transmission Service	48	1	Att A - Pro Forma Firm PTP Transmission Service Agreement	3553	3505
Form of Service Agreement Resale/Reassignment/Transfer PTP	49	1	Att A-1 - Pro Forma Resale-Reassignment-Transfer Agreement	3554	3505
Form of Service Agreement Non-Firm PTP Transmission Service	50	1	Att B - Pro Forma Non Firm PTP Transmission Service	3555	3505

New Tariff ID: 39

Tariff Title: South Dakota OATT

Program Code: E - Federal Power Act Electric (Traditional Cost of Service and Market Based Rates)

Organization: NorthWestern Corporation (Federal Power Act)

Existing Tariff ID 28			New Tariff ID 39		
Existing Section Title	Record ID	Parent ID	New Section Title	New Record ID	Parent ID
Methodology to Assess Available Transmission Capability	51	1	Att C - Methodology to Assess Available Transfer Capability	3556	3505
Methodology for Completing a System Impact Study	52	1	Att D - Methodology for Completing a System Impact Study	3557	3505
Index of Point-To-Point Transmission Service Customers	53	1	Att E - Index of PTP Transmission Service Customers	3558	3505
Service Agreement Network Integration Transmission Service	54	1	Att F - Pro Forma Service Agreement for NITS	3559	3505
Network Operating Agreement	55	1	Att G - Network Operating Agreement	3560	3505
Annual Transmission Revenue Requirement for NITS	56	1	Att H - Annual Transmission Revenue Requirement for NITS	3561	3505
Index of Network Integration Transmission Service Customers	57	1	Att I - Index of NITS Customers	3562	3505
Procedures for Addressing Parallel Flows	58	1	Att J - Procedures for Addressing Parallel Flows	3563	3505
Transmission Planning Process	59	1	Att K - Transmission Planning Process	3564	3505
Appendix A - MAPP Regional Planning Process Diagram	3024	59	App A - MAPP Regional Planning Process Diagram	3565	3564
Appendix B - Ex of WAPA Local Transmission Plan Study Cycle	3025	59	App B - Ex of WAPA Local Plan Study Cycle	3566	3564
Creditworthiness Procedures	61	1	Att L - Creditworthiness Procedures	3567	3505
Standard Large Generator Interconnection Procedures	62	1	Att M - Large Generator Interconnection Procedures	3568	3505
Small Generation Interconnection Procedures and Agreement	151	1	Att N - Small Generator Interconnection Procedures	3569	3505
Small Generator Interconnection Agreement	3077	151	Att N SGIA - Small Generator Interconnection Agreement	3800	3569
SA 30-SD - LGIA with Rolling Thunder I Power Partners LLC	3468	1	SA 30-SD - LGIA with Rolling Thunder I Power Partners LLC	3801	3505