

DATE OCT 17 2006**Kolbo, Delaine**

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**From:** PUC Docket Filings  
**Sent:** Monday, October 16, 2006 5:17 PM  
**To:** Kolbo, Delaine; Zebroski, Carol; Douglas, Tina (PUC); Forney, Heather; Van Gerpen, Patty  
**Subject:** FW: Existing Docket Filing

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**From:** Bill Taylor[SMTP:BILL.TAYLOR@WOODSFULLER.COM]  
**Sent:** Monday, October 16, 2006 5:16:38 PM  
**To:** PUC Docket Filings  
**Cc:** DAG@MAGT.COM; mrgsimon@mrenergy.com; dprogers@riterlaw.com; VanBockern, Kara; David Yaffe  
**Subject:** Existing Docket Filing  
**Auto forwarded by a Rule**

Docket Number: GE06-001 Last Name: Taylor First Name: William Company: Woods and Fuller Address: 300 S. Phillips Ave. City: Sioux Falls State: SD Zip: 57104 Phone: 336-3890 Fax: Email: [bill.taylor@woodsfuller.com](mailto:bill.taylor@woodsfuller.com)

Comments: See attached Response and Notice of Hearing in the NWC continuance matter.

10/17/2006



4. Northwestern chose to put the Commission's jurisdiction in issue. In doing so, it put its own accounting records in issue. As a billion dollar multi-state publicly owned enterprise, its accounting is sophisticated and complex, and difficult to dissect. Intervenors have been working diligently to sort out the accounting questions raised, and think they are close to answering the questions, but cannot be sure until a reasonable range of discovery has been concluded.

5. It is no burden on Northwestern to allow a short period of time to complete meaningful discovery and briefing. When the second scheduling order was discussed among the parties, I agreed to the aggressive schedule proposed by Northwestern with the express caveat that as discovery developed, it might not be feasible to meet the time lines imposed. This request is no surprise to Northwestern.

6. A reasonable extension of time for discovery and briefing will permit the Intervenors to bring the issues into clear and reasoned focus, serving the best interests of all involved.

The undersigned respectfully renews the Intervenor's request that an extension of thirty days for discovery and briefing be allowed.

Dated this 16th day of October, 2006.

WOODS, FULLER, SHULTZ & SMITH P.C.

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NOTICE OF HEARING

Heartland and SDPC's Motion for Continuance will be heard by the SD PUC  
Commission Thursday, October 19, 2006, as an agenda item in its hearing scheduled to  
commence at 9:30 a.m. CDT that day.

Dated this 16th day of October, 2006.

WOODS, FULLER, SHULTZ & SMITH P.C.

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## CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of October, 2006, I sent by United States mail, postage prepaid, a true and correct copy of Heartland and SDPC's Reply to Northwestern's Response to Motion for Continuance to the following:

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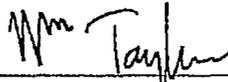
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One of the Attorneys for the Petitioner