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JUN 4 1992

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE APPLICATION) OF THE SOUTH DAKOTA INTRASTATE) PIPELINE COMPANY FOR APPROVAL OF) INITIAL RATES AND TARIFFS.)

Docket No. NG92-005 PETITION OF SOUTH DAKOTA RURAL ELECTRIC ASSOCIATION TO INTERVENE

COMES NOW the South Dakota Rural Electric Association (SDREA), by and through its undersigned attorney, Brian B. Meyer, of Meyer & Rogers, P. O. Box 89, Onida, South Dakota 57564, and petitions the South Dakota Public Utilities Commission (Commission) for authority (pursuant to ARSD 20:10:01 and SDCL 1-26-17.1) to intervene in the above-entitled docket, for the following reasons:

1. SDREA is an association whose members consist of thirty-three distribution cooperatives providing electric service in South Dakota, and three generation and transmission cooperatives. The proposed pipeline will pass through, and according to the application, either provide gas service or potentially provide gas service for customers located within SDREA member service areas.

2. SDREA member companies have constructed facilities for the generation, transmission and distribution of electric energy throughout the area in which the gas facility will be constructed. SDREA and its member systems have not been able to determine the impact the natural gas facilities will have upon the SDREA service areas.

3. A review of the rate filing application discloses that the South Dakota Intrastate Pipeline (SDIP) project intends to include an "ownership fee" as part of the rate. SDREA is concerned that the rates to be charged to gas customers may unfairly impact current electric users through an arrangement which effectively subsidizes certain customers at the expense of other customers.

4. The owners of SDIP represent that the gas will be available for sale anywhere along the pipeline route. Sales of gas to SDREA member subscribers along the route will directly and immediately affect the pecuniary interests of SDREA member systems.

DATED this third day of June, 1992.

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Brian B. Meyer
Brian B. Meyer
MEYER & ROGERS
P. O. Box 89
Onida, South Dakota 57564
Attorney for SDREA

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he served a copy of the attached PETITION TO INTERVENE upon the persons herein next designated, on the date below shown, by depositing a copy thereof in the United States mail at Onida, South Dakota, postage prepaid, in an envelope addressed to each said addressee, to-wit:

Walter J. Woods
SOUTH DAKOTA INTRASTATE PIPELINE CO.
P. O. Box 66
Pierre, South Dakota 57501-0066


Alan Dietrich
NORTHWESTERN PUBLIC SERVICE
P. O. Box 1318
Huron, South Dakota 57350-1318

Douglas W. Schulz
MONTANA-DAKOTA UTILITIES CO.
400 N. 4th St.
Bismarck, North Dakota 58501-4092

James Robbennolt
OLINGER, LOVALD, ROBBENNOLT & McCAHREN
P. O. Box 66
Pierre, South Dakota 57501-0066

C. Wayne Fox
MONTANA-DAKOTA UTILITIES CO.
400 N. 4th St.
Bismarck, North Dakota 58501-4092

Dated this third day of June, 1992.



Brian B. Meyer
MEYER & ROGERS
P. O. Box 89
Onida, South Dakota 57564
Attorney for SDREA

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

RECEIVED
MAY 21 1992
SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

In the Matter of the Application)
of the South Dakota Intrastate)
Pipeline Company for Approval of) Case No. NG92-005
Initial Rates and Tariffs)

PETITION TO INTERVENE OF MONTANA-DAKOTA UTILITIES CO.

Montana-Dakota Utilities Co. (Montana-Dakota), a Division of MDU Resources Group, Inc., pursuant to S.D.C.L. Sections 1-26-17.1 and 49-34A-11 and A.R.S.D. 20:10:01:15.02, hereby petitions to intervene in the above-captioned proceeding. In support of its Petition, Montana-Dakota respectfully shows the following:

I.

Names, titles, and mailing addresses of persons who should be served with communications concerning this Petition are:

C. Wayne Fox, Vice President -
Regulatory Affairs & General Services
Montana-Dakota Utilities Co.
400 North Fourth Street
Bismarck, North Dakota 58501
(701) 222-7900

and

Douglas W. Schulz
Senior Attorney
Montana-Dakota Utilities Co.
400 North Fourth Street
Bismarck, North Dakota 58501
(701) 222-7900

II.

Montana-Dakota is a Division of MDU Resources Group, Inc., a corporation organized and existing under the laws of the state of

Delaware, with its principal place of business located at 400 North Fourth Street, Bismarck, North Dakota 58501. MDU Resources Group, Inc. is authorized to conduct, and is conducting business in the states of South Dakota, Montana, North Dakota, and Wyoming. Montana-Dakota is a public utility engaged in the production, transmission, distribution, and sale of electricity and the distribution and sale of natural gas.

III.

The Application in the above-referenced proceeding by the South Dakota Intrastate Pipeline Company seeks approval of initial rates and tariffs.

IV.

The proposed pipeline would be located adjacent to or near a number of cities and towns to which Montana-Dakota presently provides electric service, those being Ipswich, Roscoe, Bowdle, Selby, Mobridge, and Gettysburg. In addition to the possibility of direct electric-natural gas competition, there is also the possibility that Montana-Dakota would be a potential pipeline customer.

VI.

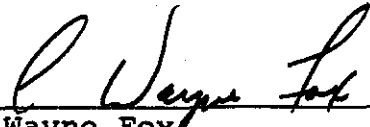
Montana-Dakota therefore has a direct and substantial interest in this proceeding, which may be adversely affected by the Commission's findings and conclusions in this matter. Montana-Dakota avers that it cannot be adequately represented by existing parties, that it has a right to intervene, and that its intervention is in the public interest. Montana-Dakota desires to be treated as a party with all rights appropriate to that status, including the right to receive all pleadings and evidence, prepare and present evidence, cross-examine, and present argument in

support of its interests as they may appear in any hearing scheduled by the Commission.

Respectfully submitted,

MONTANA-DAKOTA UTILITIES CO.,
a Division of MDU Resources Group, Inc.
400 North Fourth Street
Bismarck, North Dakota 58501

By: _____


C. Wayne Fox
Vice President - Regulatory
Affairs & General Services

Dated: May 19th, 1992

Douglas W. Schulz
Senior Attorney
Montana-Dakota Utilities Co.
400 North Fourth Street
Bismarck, North Dakota 58501

CERTIFICATE OF SERVICE

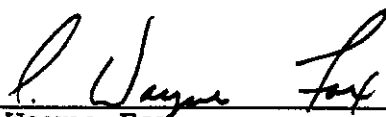
I hereby certify that on this day I have served the Petition to Intervene of Montana-Dakota Utilities Co. in Case No. NG92-005 upon:

Walter J. Woods
Vice President
South Dakota Intrastate
Pipeline Company
117 East Capitol
P.O. Box 66
Pierre, South Dakota 57501

Alan Dietrich
Vice President - Legal and
Corporate Secretary
Northwestern Public Service Company
Third Street & Dakota Avenue South
P.O. Box 1318
Huron, South Dakota 57350

James Robbennolt
Olinger, Lovald, Robbennolt
& McCahren, P.C.
117 East Capitol
P.O. Box 66
Pierre, South Dakota 57501

Dated at Bismarck, North Dakota, this 19th day of May, 1992.



C. Wayne Fox
Vice President Regulatory Affairs
& General Services

cc: Marshall Damgaard
Executive Director
South Dakota Public Utilities Commission

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SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE APPLICATION FOR APPROVAL OF INITIAL RATES AND TARIFFS FOR SOUTH DAKOTA INTRASTATE PIPELINE COMPANY

PETITION TO INTERVENE (Docket NG92-005)

COMES NOW Northwestern Public Service Company ("NWPS") to petition to intervene as a party in this matter, pursuant to ARSD 20:10:01:15.02 and 20:10:01:15.03. The facts which support NWPS' interest in this matter are as follows:

- 1. South Dakota Intrastate Pipeline Company ("SDIPC") has filed an application with the Commission for approval of initial rates and tariffs for natural gas to be transported and sold from its proposed pipeline, for which siting authority has been requested in Docket No. NG92-002.
2. Such initial rates, if approved, would apply to sales by SDIPC to a gas distributor in the City of Pierre, as well as other communities and rural customers along the proposed pipeline.
3. NWPS is, at the present time, involved with Northern Natural Gas Company in gas line construction projects to bring natural gas to several South Dakota communities and rural customers near such communities.
4. NWPS has studied and continues to study the feasibility of constructing a gas pipeline to the City of Pierre and a gas distribution system in the City of Pierre.
5. Because of its interest as a potential gas supplier to and/or in the City of Pierre, NWPS has an interest in this matter and in the evidence to be presented at any hearings to be held in this matter.

WHEREFORE, NWPS requests that it be allowed to intervene and participate as a party in this matter, or in the alternative, that it be allowed to intervene, pursuant to SDCL 49-34A-13.1, without party status for the purpose of representing its interests in this matter.

Dated this 1st day of May, 1992.

NORTHWESTERN PUBLIC SERVICE COMPANY

By [Signature] Vice President - Legal & Corporate Secretary

CERTIFICATE OF SERVICE

The undersigned attorney for Northwestern Public Service Company hereby certifies that he has this day deposited in the United States Postal Service mail, postage prepaid, a true and correct copy of the foregoing Petition to Intervene of Northwestern Public Service Company addressed to the following:

Mr. James C. Robbenolt
Attorney at Law
P. O. Box 66
Pierre, SD 57501

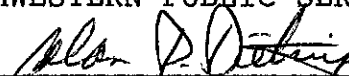
Mr. James E. Carlon
Attorney at Law
P. O. Box 249
Pierre, SD 57501

Mr. Doug E. Eidahl
Assistant Attorney General
S. D. Public Utilities Commission
500 E Capitol
Pierre, SD 57501

Dated this 1st day of May, 1992, at Huron, South
Dakota.

NORTHWESTERN PUBLIC SERVICE COMPANY

By



Its Attorney

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JUN 25 19

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA SOUTH DAKOTA
UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF) PETITION TO INTERVENE
THE SOUTH DAKOTA INTRASTATE PIPELINE) BY CITY OF PIERRE,
COMPANY FOR APPROVAL OF INITIAL RATES) SOUTH DAKOTA
AND TARIFFS.) (Docket NG92-005)

COMES NOW the City of Pierre, South Dakota (Pierre) and
petitions to intervene as a party in this matter pursuant to
ARSD 20:10:01:15.02 and 20:10:01:15.03. The facts supporting
Pierre's interest as party in this matter are as follows:

1. South Dakota Intrastate Pipeline Company
has filed an Application for the construction
of a pipeline in central South Dakota to
provide natural gas service to several
communities described therein. The citing
case for this application is Docket NG92-005.
Pierre is the anchor of the proposed pipeline
involved in that case. It is believed to be
common knowledge that without service to
Pierre the proposed pipeline will not be
constructed or operated. Pursuant to notice
received, Pierre has applied for party status
in the citing case.

2. Pierre is anxious to explore and obtain
quality natural gas service to its residents
at a reasonable cost therefor. In fact if
economically feasible, Pierre has tentative
plans to itself provide the sale and
distribution of natural gas as a municipal
utility to its residents. This of course is
completely dependent upon construction of the
pipeline involved and the ability of Pierre
to obtain natural gas therefrom at a
reasonable and competitive cost.

3. The price of natural gas to the residents
of Pierre is important for competitive
reasons with other fuel costs whether or not
Pierre is the distributor thereof. The
importance of the potential customers in
Pierre is clear by reason of the fact that it
is believed there are more potential
customers in Pierre than there are all

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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF) PETITION TO INTERVENE
THE SOUTH DAKOTA INTRASTATE PIPELINE) BY CITY OF PIERRE,
COMPANY FOR APPROVAL OF INITIAL RATES) SOUTH DAKOTA
AND TARIFFS.) (Docket NG92-005)

COMES NOW the City of Pierre, South Dakota (Pierre) and
petitions to intervene as a party in this matter pursuant to
ARSD 20:10:01:15.02 and 20:10:01:15.03. The facts supporting
Pierre's interest as party in this matter are as follows:

1. South Dakota Intrastate Pipeline Company has filed an Application for the construction of a pipeline in central South Dakota to provide natural gas service to several communities described therein. The citing case for this application is Docket NG92-005. Pierre is the anchor of the proposed pipeline involved in that case. It is believed to be common knowledge that without service to Pierre the proposed pipeline will not be constructed or operated. Pursuant to notice received, Pierre has applied for party status in the citing case.

2. Pierre is anxious to explore and obtain quality natural gas service to its residents at a reasonable cost therefor. In fact if economically feasible, Pierre has tentative plans to itself provide the sale and distribution of natural gas as a municipal utility to its residents. This of course is completely dependent upon construction of the pipeline involved and the ability of Pierre to obtain natural gas therefrom at a reasonable and competitive cost.

3. The price of natural gas to the residents of Pierre is important for competitive reasons with other fuel costs whether or not Pierre is the distributor thereof. The importance of the potential customers in Pierre is clear by reason of the fact that it is believed there are more potential customers in Pierre than there are all

add to last

together along the remaining length of the proposed pipeline.

This application is a late filing because Pierre was not aware of the deadline for filing to intervene and received no notice or other communication of the time required for filing. Pierre did receive notice and timely applied in the citing case and because of Pierre's unfamiliarity with the Public Utilities Commission proceedings and rules, did not realize a separate application for intervention was required to be timely made in this proceeding. Pierre requests the Public Utilities Commission to waive its deadline for application to intervene and grant Pierre's request therefor.

WHEREFORE, Pierre requests that it be allowed to intervene and participate as a party in this matter, or in the alternative that it be allowed to intervene without party status for the purpose of representing its interest herein.

DATED this 25th day of June, 1992.

CITY OF PIERRE, SOUTH DAKOTA

By: Gary L. Drewes
Gary L. Drewes, Mayor

CERTIFICATE OF SERVICE

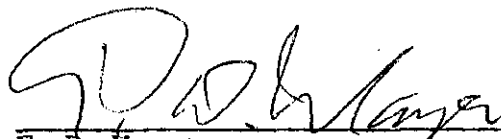
The undersigned attorney for City of Pierre, South Dakota, hereby certified that on the 25th day of June, 1992, he mailed by first class mail postage prepaid, true and correct copy of the foregoing Petition to Intervene by City of Pierre, South Dakota to the following:

James Robbennolt
Olinger, Lovald, Robbennolt & McCahren
P.O. Box 66
Pierre, SD 57501

C. Wayne Fox
Montana-Dakota Utilities Co.
400 N. 4th Street
Bismarck, ND 58501-4092

Brian Meyer
Attorney at Law
P.O. Box 89
Onida, SD 57564-0089
Attorney for SDREA

Alan Dietrich
Northwestern Public Service
P.O. Box 1318
Huron, SD 57350-1318



E. D. Mayer
City Attorney
319 S. Coteau - P.O. Box 280
Pierre, SD 57501-0280
(605) 224-5825