

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

<b>IN THE MATTER OF COMMISSION</b>	)	
<b>STAFF'S PETITION FOR</b>	)	<b>PETITION TO INTERVENE</b>
<b>DECLARATORY RULING REGARDING</b>	)	
<b>FARM TAP CUSTOMERS</b>	)	<b>NG16-014</b>
	)	

Northern Natural Gas Company ("Northern"), pursuant to ARSD 20:10:01:15.02, hereby petitions to intervene in the above-entitled matter. In support of its Petition to Intervene, Northern states as follows:

1. Northern is a "natural gas company" subject to the exclusive jurisdiction of the Federal Energy Regulatory Commission ("FERC") under the Natural Gas Act (15 U.S.C.A. §717 et seq), and subject to the exclusive safety regulation of the Pipeline and Hazardous Material Safety Administration ("PHMSA") pursuant to the Pipeline Safety Act (49 U.S.C.A. §60101 et seq). Northern operates high pressure interstate natural gas transmission pipelines across 11 states, from the Permian Basin in Texas to Michigan's Upper Peninsula, including the state of South Dakota.
2. Northern does not provide retail sales service, and does not provide services subject to the regulation of any state public utilities commission.
3. The Petition for Declaratory Ruling and the Staff Memorandum filed in this docket contain erroneous statements concerning, *inter alia*, Northern's services, the regulation of Northern's business and assets, and an agreement entered into between Northern and Utilicorp United, Inc. April 1, 1987.
4. Through the Petition for Declaratory Ruling and the Staff Memorandum, staff purports to request an order from the Commission affecting the rights of Northern.
5. Northern seeks permission to intervene pursuant to ARSD 20:10:01:15.02 to provide comments and oral argument, if appropriate.

WHEREFORE, Northern requests that the Commission grant this petition and allow Northern to intervene in this proceeding.

Dated this 21<sup>st</sup> day of November, 2016.

Northern Natural Gas Company

A handwritten signature in blue ink, appearing to read "J. Porter", is written over a horizontal line.

J. Gregory Porter  
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