

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF)	
)	
PETITION OF MIDAMERICAN ENERGY)	
COMPANY AND NORTHWESTERN)	
CORPORATION, D.B.A. NORTHWESTERN)	Docket No. NG17-_____
ENERGY FOR WAIVER OF INITIAL)	
AND FINAL METER READING)	Request for Waiver of Administrative Rule
REQUIREMENTS)	

JOINT REQUEST FOR WAIVER

MidAmerican Energy Company ("MidAmerican") and NorthWestern Corporation, d.b.a. NorthWestern Energy, ("NorthWestern") jointly petition the South Dakota Public Utilities Commission ("Commission") for a waiver of a portion of ARSD 20:10:17:02. MidAmerican and NorthWestern are in the process of transitioning the provision of certain services for a certain group of farm tap customers. This waiver request is designed to make this transition more efficient and therefore more cost-effective for all customers. In support of this Petition, MidAmerican and NorthWestern state:

1. MidAmerican is in the process of transitioning approximately 180 farm tap customers to MidAmerican's services. The farm taps are off of an interstate pipeline which is located on the property of the farm tap customers, who have granted easements to the interstate pipeline owned and operated by Northern Natural Gas ("Northern").

2. Northern does not directly provide certain services to these farm tap customers, including billing, emergency services, checking and filing odorizers and meter reading. These

services are provided by a separate entity, and are currently provided by NorthWestern pursuant to an agreement between Northern and NorthWestern (“Agreement”).

3. The Agreement is set to expire on December 31, 2017 as acknowledged by the Commission in its order dated March 11, 2011 in Docket NG11-001. In July of this year, MidAmerican filed a proposal with the Commission to take over the provision of services to these approximately 180 farm tap customers. On August 23, 2017, the Commission approved tariff revisions with an effective date of August 15, 2017 to MidAmerican’s gas service tariff designed to implement the proposal to transition these customers to MidAmerican’s farm tap service. MidAmerican is developing billing procedures to begin service to the customers as of January 1, 2018.

4. Since Commission approval, MidAmerican has been working to transition these farm tap customers consistent with the Commission-approved tariff provisions. Part of the transition process includes coordination with NorthWestern to ensure that these farm tap customers have access to continuous natural gas service until the termination date of the Agreement.

5. Part of the transition process includes both NorthWestern and MidAmerican having a common meter read to end service and bill the farm tap customers (NorthWestern) and to start service to have a baseline for a future billing period (MidAmerican).

6. ARSD 20:10:17:02 requires that a utility representative read the meter at least once each 12 months, *and at the beginning or termination* of service (emphasis added). A plain reading of this rule appears to require that a utility (or utility acting as a subcontractor to another party) that is terminating service must get an in-person meter read. This also requires that a utility beginning service must get an in-person meter read. In the present situation, this would appear to

require NorthWestern to obtain a final meter read on behalf of Northern and MidAmerican to obtain an initial meter read.

7. These farm tap customers are spread out over a large area spanning several counties. In the present situation, it would be more efficient for each party to perform meter reads and then exchange the information with the other. That is, if MidAmerican performs an initial read, that same information could be provided to NorthWestern as a final meter read to meet its billing obligations per the Agreement.

8. MidAmerican and NorthWestern have discussed the potential to divide the meter reading requirements and have identified meters in certain counties that are physically closer to each utility's service centers. If this waiver is granted, the parties will finalize plans to share this work to ensure it is completed efficiently and before the end of the year.

9. Sharing the meter reading burden will be more efficient, less costly and is therefore better for customers.

WHEREFORE, MidAmerican and NorthWestern request that the Commission grant a waiver of ARSD 20:10:17:02 and allow the parties to perform a single meter read and share information to comply with the requirement to have an initial and final meter read.

Respectfully submitted this 17th day of November, 2017.

MIDAMERICAN ENERGY COMPANY

NORTHWESTERN ENERGY COMPANY

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