August 1, 2023

Ms. Patricia Van Gerpen
Executive Director
South Dakota Public Utilities Commission
500 East Capitol Avenue
Pierre, SD 57501-5070

Re: Docket No. PS18-002 - Removal of Waiver of 49 CFR, Section 192.481(a)

Dear Ms. Van Gerpen:

NorthWestern Energy (NorthWestern) submits this request to remove the waiver of 49 CFR Section 192.481(a) granted by the South Dakota Public Utilities Commission on January 10, 2019 in Docket No. PS18-002. NorthWestern is requesting the Commission's approval to remove this waiver as it is no longer necessary and is void due to a change in Pipeline Safety Regulations § 192.481(a), effective March 12, 2021.

§ 192.481(a) Atmospheric corrosion control: Monitoring states:

(a) Each operator must inspect and evaluate each pipeline or portion of the pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion, as follows:

Pipeline type:	Then the frequency of inspection is:
Onshore other than a Service Line	At least once every 3 calendar years, but with intervals not exceeding 39 months.
Onshore Service Line	At least once every 5 calendar years, but with intervals not exceeding 63 months, except as provided in paragraph (d) of this section.
Offshore	At least once each calendar year, but with intervals not exceeding 15 months.

NorthWestern's request for a waiver in Docket No. PS18-002, which was subsequently authorized by the Commission, allowed for the following:

1. Outside of business districts, conducting leak surveying and atmospheric corrosion inspection concurrently at least every four calendar years at intervals not exceeding 51 months;

2. Inside of business districts, conducting leak surveying and atmospheric corrosion inspection concurrently at least every calendar year at intervals not exceeding 15 months;

3. Atmospheric corrosion control monitoring of regulator stations, critical and emergency valves, and any other above ground piping that may be monitored pursuant to 49 CPR 192. 721, will continue to be conducted at the same time the above facilities are maintained; and

4. Identify, inspect and notify SDPUC of those areas requiring atmospheric corrosion control monitoring more frequently than once every three calendar years. These areas include the following "hot spots" where there are greater atmospheric corrosion rates:

a. Above ground pipelines where there is a greater exposure to road salts and chemicals;

b. Areas where pipelines could have accelerated corrosion due to industrial chemicals in the atmosphere;

c. Pipelines that may experience sweating due to pressure drop, such as regulator stations, metering correctors, and large customers' regulator/meter sets;

d. Inside regulator/meter sets that are subject to corrosive environments; and

e. Other areas that show accelerated atmospheric corrosion.

5. Personnel performing the tasks of leak survey and inspection for atmospheric corrosion must have the required operator qualifications to perform the associated tasks.

Since NorthWestern's practices are consistent with the Pipeline Safety Regulations set forth in § 192.481(a), effective March 12, 2021, the alternative inspection schedule for atmospheric corrosion authorized in Docket No. PS18-002 is no longer necessary.

Sincerely,

Pamela A. Bonrud
Director of Government and Regulatory Affairs
pam.bonrud@northwestern.com
O 605-978-2990
C 605-321-4025

Cc: Melissa Baruth, Supervisor DoT, NorthWestern Energy
Kris Doherty, Analyst Data, NorthWestern Energy