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July 20, 2009

Patty Van Gerpen  
Executive Director  
SD Public Utilities Commission  
500 E. Capitol  
Pierre, SD 57501

RE: RM08-002 PURPA Interconnection Standards

Dear Ms. Van Gerpen:

NorthWestern Corporation, d.b.a. NorthWestern Energy (NorthWestern), appreciates this opportunity to respond to Staff's July 2, 2009 memorandum regarding six forms related to the Small Generator Interconnection Agreement rules recently adopted by the SD Public Utilities Commission. In general, NorthWestern is in agreement with the forms drafted and proposed by staff with one requested addition.

NorthWestern requests that the forms be modified to include information identifying what kind of site control the Small Generator owner possesses. A separate section could be added for Site Control to mean one of the following means of reasonable documentation: (1) ownership of, a leasehold interest in, or a right to develop a site for the purpose of constructing the Small Generating Facility; (2) an option to purchase or acquire a leasehold site for such purpose; or (3) an exclusivity or other business relationship between the Small Generator Interconnection Customer and the entity having the right to sell, lease or grant the Small Generator Interconnection Customer the right to possess or occupy a site for such purpose.

NorthWestern Energy appreciates the cooperation and willingness of Staff to work with the utilities and other interested parties in developing all aspects of the Small Generator Interconnection Agreement rules. Please advise if there are additional questions.

Sincerely,

A handwritten signature in cursive script that reads "Pamela A. Bonrud".

Pamela A. Bonrud  
Director – SD/NE Government and Regulatory Affairs

CC: Sara Dannen, Corporate Counsel  
Carolyn Loos, Director – Business Performance and Analysis