

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

| | | |
|---|---|----------------------------|
| IN THE MATTER OF THE PETITION FOR |) | |
| TEMPORARY ELECTRICAL SERVICE BY |) | |
| DAKOTA PLAINS AG CENTER, LLC TO HAVE |) | DOCKET NO. EL16-014 |
| NORTHWESTERN ENERGY ASSIGNED AS ITS |) | |
| ELECTRIC SERVICE PROVIDER IN THE |) | |
| SERVICE TERRITORY OF BON HOMME – |) | |
| YANKTON ELECTRIC COOPERATIVE, INC. |) | |

NORTHWESTERN ENERGY’S PETITION TO INTERVENE

NorthWestern Corporation d/b/a NorthWestern Energy (“NorthWestern”) hereby petitions the South Dakota Public Utilities Commission (“Commission”) for intervention in the above-captioned proceeding pursuant to SDCL § 1-26-17.1, ARSD § 20:10:01:15.02 and 20:10:01:15.03. In support hereof, NorthWestern states as follows:

1. Dakota Plains Ag Center, LLC (“Dakota Plains”) plans to construct a new grain handling terminal (the “Terminal”) in Yankton County, South Dakota. The site of the Terminal is within the service territory of NorthWestern and Bon Homme-Yankton Electric Association, Inc.
2. On April 1, 2016, Dakota Plains filed a Petition for Temporary Electrical Service (the “Petition”) pursuant to SDCL §§ 49-34A-56 and 58, in which it requested the Commission assign NorthWestern as the supplier of temporary electrical service to the area under development, including territory currently served by Bon Homme-Yankton Electric Association, Inc. NorthWestern is ready, able and willing to provide temporary electrical service to Dakota Plains during construction of the Terminal.
3. On April 7, 2016, the Commission noticed filing of the Petition on its Weekly Filings and established an intervention deadline of April 22, 2016.
4. On April 8, 2016, NorthWestern and Dakota Plains executed an Electric Distribution Service Agreement (“Agreement”). The terms and conditions of the Agreement

control NorthWestern's delivery of permanent service to the Terminal, if approved by the Commission. Accordingly, NorthWestern would provide temporary service to Dakota Plains in accordance with the terms and conditions of NorthWestern's tariffs.

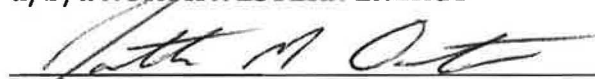
5. NorthWestern's pecuniary interests will be directly and immediately affected by the Commission's decision on the Petition. NorthWestern desires to intervene in this matter to provide information regarding its ability to provide temporary electric service to the Facility.

6. Based on the foregoing, NorthWestern is an interested party in this matter entitled to intervening party status.

WHEREFORE, NorthWestern requests that the Commission grant this Petition to Intervene and allow NorthWestern to be granted party status in this proceeding.

Dated this 8th day of April, 2016.

**NORTHWESTERN CORPORATION,
d/b/a NORTHWESTERN ENERGY**



By: Jonathan M. Oostra
Its: Corporate Counsel
3010 West 69th Street
Sioux Falls, SD 57108
Phone: (605) 978-2940

CERTIFICATE OF SERVICE

I the undersigned hereby certify that on the 8th day of April, 2016, true and correct copies of the foregoing, *NorthWestern's Petition to Intervene*, was served upon the following by electronic mail:

Ms. Patricia Van Gerpen
Executive Director
South Dakota Public Utilities Commission
patty.vangerpen@state.sd.us

Ms. Kristen Edwards
Staff Attorney
South Dakota Public Utilities Commission
kristen.edwards@state.sd.us

Mr. Patrick Steffensen
Staff Analyst
South Dakota Public Utilities Commission
patrick.steffensen@state.sd.us

Mr. Eric Paulson
Staff Analyst
South Dakota Public Utilities Commission
eric.paulson@state.sd.us

Mr. Brett Koenecke - Representing Dakota Plains Ag Center, LLC
May, Adam, Gerdes and Thompson, LLP
P.O. Box 160
Pierre, SD 57501
Brett@mayadam.net

Ms. Kara Semmler - Representing Dakota Plains Ag Center, LLC
May, Adam, Gerdes and Thompson, LLP
P.O. Box 160
Pierre, SD 57501
kcs@magt.com

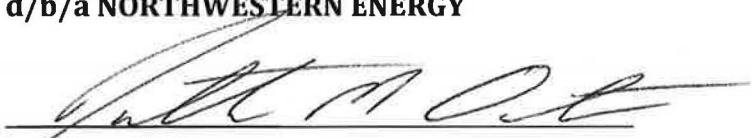
Mr. Al Brogan, Corporate Counsel
NorthWestern Energy
al.brogan@northwestern.com

Mr. Jon Oostra, Corporate Counsel
NorthWestern Energy
jon.oostra@northwestern.com

Ms. Pamela Bonrud
Director Government & Regulatory Affairs
NorthWestern Energy
pam.bonrud@northwestern.com

Mr. Jeffrey Decker
Specialist Regulatory Affairs
NorthWestern Energy
jeffrey.decker@northwestern.com

**NORTHWESTERN CORPORATION,
d/b/a NORTHWESTERN ENERGY**


Jonathan M. Oostra