



October 27, 2017

via eFiling

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street N.E.
Washington, DC 20426

Re: *NorthWestern Corporation (South Dakota)*, Docket No. ER18-____-000 ER18-174-00
Rate Schedule No. 40-SD | Certificate of Concurrence to Coyote 1 Station Transmission
Facilities Agreement and Supplements

Dear Secretary Bose:

Pursuant to Section 205 of the Federal Power Act¹, Part 35 of the Federal Energy Regulatory Commission's regulations², and Order No. 714³, NorthWestern Corporation d/b/a NorthWestern Energy submits a Certificate of Concurrence, as Rate Schedule No. 40-SD, to the Coyote 1 Station Transmission Facilities Agreement between Otter Tail Power Company, Minnesota Power & Light Company, Minnkota Power Cooperative, Inc., Montana–Dakota Utilities Co. (MDU), Northwestern Public Service Company (NorthWestern Energy's predecessor⁴), and Northern Municipal Power Agency ("Coyote Transmission Agreement"), dated as of November 30, 1978, as supplemented and amended. The Coyote Transmission Agreement was filed with the Commission on October 24, 2017, in Docket No. ER18-152-000.

I. Background of Filing Party

NorthWestern Energy is a public utility engaged in the generation, transmission, and distribution of electricity and the supply and transportation of natural gas. Its facilities are

¹ 16 U.S.C. § 824d (2012).

² 18 C.F.R. Part 35 (2013).

³ *Electronic Tariff Filings*, FERC Stats. & Regs. ¶ 31,276 (2008) (Order No. 714).

⁴ Effective February 15, 2002, NorthWestern Energy succeeded to all tariffs, rate schedules, supplements, and service agreements of NorthWestern Public Service Company. *NorthWestern Energy*, Docket No. ER03-376-000 (Feb. 13, 2003) (letter order accepting Notice of Succession reflecting corporate name change).



located primarily in Montana and South Dakota. In South Dakota, NorthWestern Energy is a transmission owner within the Southwest Power Pool, Inc. and has transferred functional control of a large portion of its electric transmission facilities there to SPP. In Montana, NorthWestern Energy is a transmission owner/operator and Balancing Authority Area operator within the Western Electricity Coordinating Council. NorthWestern Energy's Montana and South Dakota transmission facilities are not physically connected and are not in the same electric reliability region. This filing concerns NorthWestern Energy's South Dakota operations.

II. Description of Filing

On October 24, 2017, Otter Tail filed the Coyote Transmission Agreement as the "designated filer" under the Joint Tariff Filing procedures outlined in Order No. 714. Under these procedures, when multiple utilities are parties to the same tariff, the joint tariff may be filed by a single designated utility, and any non-designated utilities must submit a certificate of concurrence and a single tariff page containing the name of the tariff and the utility designated to file the joint tariff on behalf of the other utilities.⁵ Consistent with Order No. 714, NorthWestern Energy submits the attached Certificate of Concurrence for the Coyote Transmission Agreement filed by Otter Tail in Docket No. ER18-152-000.⁶ In addition, NorthWestern Energy includes a single tariff page incorporating by reference into its database the Coyote Transmission Agreement. NorthWestern Energy requests the Commission accept the single tariff page as Rate Schedule No. 40-SD.

III. Effective Date & Request for Waiver

As described in the transmittal letter⁷ submitted by Otter Tail, the parties to the Coyote Transmission Agreement respectfully request an effective date of November 30, 1978, for the Coyote Transmission Agreement. For the reasons outlined in that transmittal letter, NorthWestern Energy respectfully requests waiver of the Commission's prior notice requirement⁸ to allow this effective date.⁹

⁵ Order No. 714 at PP 61–63.

⁶ MDU's Certificate of Concurrence was filed on October 25, 2017, in Docket No. ER18-160-000.

⁷ Accession No. 20171024-5154.

⁸ 18 C.F.R. § 35.11.

⁹ Due to the constraints inherent in the Commission's eTariff system, the "metadata" effective date of an eTariff record cannot be earlier than the date of the filing utility's baseline eTariff. Because NorthWestern Energy filed its baseline eTariff on September 29, 2010, the eTariff metadata submitted for this filing reflects this date. However, NorthWestern Energy submits that metadata expressly without prejudice to the request above for the November 30, 1978 effective date and associated waivers.



IV. Filing Information

This filing includes the following documents:

- 1) This transmittal letter;
- 2) Certificate of Concurrence; and
- 3) Single tariff record incorporating by reference the Coyote Transmission Agreement, identified as NorthWestern Energy's Rate Schedule No. 40-SD.

V. Notice and Service

NorthWestern Energy will provide a copy of this filing to each of the Coyote co-owners and to the South Dakota Public Utilities Commission. In addition, this filing is available for public inspection at NorthWestern Energy's Corporate Office, 3010 West 69th Street, Sioux Falls, South Dakota.

VI. Communications

Communications concerning this filing should be directed to the following representatives:

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Vice President – Transmission
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M. Andrew McLain
Director – Transmission Market Strategy &
FERC Compliance Officer
NorthWestern Energy
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Phone: (406) 443-8987
andrew.mclain@northwestern.com

VII. Conclusion

NorthWestern Energy respectfully requests that the Commission accept the Coyote Transmission Agreement, as requested by Otter Tail, and also requests the Commission accept the single tariff page submitted in this filing as NorthWestern Energy's Rate Schedule No. 40-SD.



Please contact me with any questions.

Respectfully submitted,

s/ M. Andrew McLain

M. Andrew McLain

Director – Transmission Market Strategy & FERC Compliance Officer

andrew.mclain@northwestern.com

○ (406) 443-8987

MAM/dq

Attachment



Certificate of Service

I hereby certify that I have this day served the foregoing document upon each person designated in the foregoing transmittal letter, in accordance with Rule 2010 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.2010.

Dated this 27th day of October, 2017.

s/ Dori L. Quam

Dori Quam

Lead – Transmission Regulatory Support

dori.quam@northwestern.com

United States of America
Federal Energy Regulatory Commission

**Certificate of Concurrence of
NorthWestern Corporation**

This is to certify that NorthWestern Corporation d/b/a NorthWestern Energy assents to and concurs in the rate schedule described below, which Otter Tail Power Company has filed, and hereby files this Certificate of Concurrence in lieu of the filing of the rate schedule specified.

Joint Tariff Name: Coyote 1 Station Transmission Facilities Agreement

NorthWestern Rate Schedule No.: 40-SD

Designated Filing Company (DFC): Otter Tail Power Company

DFC Tariff Title: Tariff Database

DCF Program: Electric TCS and MBR

DCF Tariff Record: TFA - Coyote 1, Coyote 1 Station Transmission Facilities Agmt-MDU NWPS NMPA

Respectfully submitted,

**NorthWestern Corporation d/b/a
NorthWestern Energy**

s/ M. Andrew McLain

M. Andrew McLain
Director – Transmission Market Strategy &
FERC Compliance Officer

Dated: October 27, 2017

NorthWestern Corporation (South Dakota)

Rate Schedule FERC No. 40-SD

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|---|---|
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| DCF Tariff Record: | TFA - Coyote 1, Coyote 1 Station Transmission Facilities Agmt-MDU NWPS NMPA |