



April 11, 2019

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

via eFiling

ER19-1557-000

Re: *NorthWestern Corporation (South Dakota)*, Docket No. ER19-\_\_-000  
Notice of Cancellation of Service Agreement No. 30-SD, Standard Large Generator  
Interconnection Agreement between NorthWestern Corporation and Rolling Thunder I  
Power Partners, LLC  
Type of Filing Code: 260

Dear Secretary Bose:

Pursuant to 18 C.F.R. § 35.15, NorthWestern Corporation d/b/a NorthWestern Energy submits for filing a Notice of Cancellation of the Standard Large Generator Interconnection Agreement (LGIA) between NorthWestern Corporation and Rolling Thunder I Power Partners, LLC (referred to herein as "Titan Wind"). The Titan Wind LGIA is designated as Service Agreement No. 30-SD under NorthWestern's South Dakota Open Access Transmission Tariff (OATT).<sup>1</sup>

## I. Background

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### A. NorthWestern Energy

NorthWestern is a public utility engaged in the generation, transmission, and distribution of electricity and the supply and transportation of natural gas. Its facilities are located primarily in Montana and South Dakota. In South Dakota, NorthWestern is a transmission-owning member of SPP and has transferred functional control of its electric transmission facilities to SPP. In Montana, NorthWestern is a transmission owner/operator and Balancing Authority Area operator within the Western Electricity Coordinating Council. NorthWestern's Montana and South Dakota transmission facilities are not physically connected and are not in the same electric reliability region. This filing concerns a service agreement under NorthWestern's South Dakota OATT.

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<sup>1</sup> NorthWestern Corporation, FERC FPA Electric Tariff, South Dakota OATT, SA 30-SD – LGIA with Rolling Thunder I Power Partners LLC.



## B. The Titan Wind LGIA

NorthWestern joined SPP and transferred functional control of its electric transmission facilities to SPP in 2015. Transmission and generator interconnection services over NorthWestern's transmission facilities are now provided by SPP under the SPP OATT. As discussed more fully in NorthWestern's request for limited waiver<sup>2</sup> filed in Docket No. ER18-2324-000, during the course of NorthWestern's efforts to join SPP, a disagreement arose regarding whether certain NorthWestern transmission facilities qualified as "Transmission Facilities" under Attachment AI of the SPP OATT. The facilities at issue included part of the radial line connecting the Titan Wind facility to NorthWestern's transmission facilities. As a result, Titan Wind's interconnection service was not transferred to the SPP OATT in 2015, and Titan Wind remained under NorthWestern's South Dakota OATT. Titan Wind, SPP, and NorthWestern have been working together to transfer Titan Wind's interconnection service to the SPP OATT.

## II. Description of Filing

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Titan Wind, as the Interconnection Customer; SPP, as the Transmission Provider; and NorthWestern, as the Transmission Owner, have now entered into a new Generator Interconnection Agreement (GIA) under the SPP OATT for the Titan Wind Farm. This three-party GIA, designated by SPP as Service Agreement 3548 and filed in Docket No. ER19-1554-000, replaces the existing Titan Wind LGIA. NorthWestern is therefore filing this notice to cancel the Titan Wind LGIA under its South Dakota OATT coterminous with the requested effective date for the three-party GIA filed by SPP.

Titan Wind has authorized NorthWestern to represent that it fully supports this filing.

## III. General Information

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Pursuant to the Commission's regulations, NorthWestern provides the following information:

### A. List of Documents Submitted

This filing includes the following documents:

- 1) This transmittal letter; and
- 2) Notice of Cancellation for the Titan Wind LGIA (Service Agreement No. 30-SD).

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<sup>2</sup> Accession No. 20180827-5153.



## B. Proposed Effective Date & Request for Waiver

Pursuant to 18 C.F.R. § 35.15(a) and for good cause shown, NorthWestern respectfully requests an effective date of April 4, 2019, for the cancellation. This date corresponds to the requested effective date for the new three-party GIA among Titan Wind, SPP, and NorthWestern. The Commission's policy permits waivers of the 60-day prior-notice requirement in the case of uncontested filings that do not change rates.<sup>3</sup>

NorthWestern respectfully submits that any requirements of 18 C.F.R. § 35.15 that have not been specifically addressed are inapplicable to this filing. To the extent that the Commission determines the requirements of Section 35.15 or any other rules to be applicable, NorthWestern respectfully requests waiver of the requirements of such provisions.

## C. Notice

NorthWestern will provide a copy of this filing to Titan Wind, the Southwest Power Pool, and the South Dakota Public Utilities Commission. Copies are also available for public inspection at NorthWestern's Corporate Office, 3010 West 69<sup>th</sup> Street, Sioux Falls, South Dakota.

## IV. Conclusion

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NorthWestern respectfully requests that the Commission accept the cancellation of the Titan Wind LGIA, effective April 4, 2019, as requested, and grant waiver of any other Commission regulations deemed applicable this filing.

Respectfully submitted,

s/ **M. Andrew McLain**

**M. Andrew McLain**

Director – Transmission Market Strategy & FERC Compliance Officer

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○ 406-443-8987

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<sup>3</sup> See *Central Hudson Gas & Electric Co.*, 60 FERC ¶ 61,106, *reh'g denied*, 61 FERC ¶ 61,089 (1992), and *Prior Notice and Filing Requirements Under Part II of the Federal Power Act*, 64 FERC ¶ 61,139, *clarified*, 65 FERC ¶ 61,081 (1993).



Attachment

cc: Rolling Thunder I Power Partners, LLC (Titan Wind)  
Southwest Power Pool, Inc.  
South Dakota Public Utilities Commission

## Certificate of Service

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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 11<sup>th</sup> day of April, 2019.

*s/ Dori Quam*

Dori Quam  
Lead – Transmission Regulatory Support  
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Cancels Service Agreement No. 30-SD

## **Notice of Cancellation**

Standard Large Generator Interconnection Agreement (LGIA)  
between NorthWestern Corporation  
and Rolling Thunder I Power Partners, LLC

NorthWestern Corporation  
South Dakota OATT