



April 1, 2025

Ms. Patricia Van Gerpen, Executive Director
South Dakota Public Utilities Commission
500 E. Capital
Pierre, SD 57501

RE: Docket EL25-XXX - In the Matter of NorthWestern Energy Public Service Corporation Request to Implement a Phase-In Rate Plan Rider

Dear Ms. Van Gerpen,

NorthWestern Energy Public Service Corporation, d/b/a NorthWestern Energy ("NorthWestern"), submits the attached petition to the South Dakota Public Utilities Commission ("Commission") in support of its request to implement a Phase-In Rate Plan ("PIRP") Rider for the recovery of capital investment costs associated with an electric generation plant rebuild located in Aberdeen, South Dakota and costs related to its evaluation of Small Modular Nuclear Reactors ("SMR") technology to meet future generation and capacity needs. In its Amended Order dated January 17, 2024, approving the Settlement Stipulation in Docket EL23-016, the Commission permitted NorthWestern to submit proposed rates for recovery of investment costs related to new incremental generation capacity owned by NorthWestern, which rates shall be subject to annual Commission review through the PIRP Rider. The Commission's order also placed the following conditions on NorthWestern for a PIRP Rider submittal:

1. A proposed PIRP Rider must be filed at least 90 days prior to the requested effective date.
2. The filing shall include, but not be limited to, detail regarding the proposed generation resources including justification of need, projected costs, and an updated tariff with relevant rates.

The information submitted in support of NorthWestern's request to implement its PIRP Rider conforms to the conditions prescribed by the Commission. NorthWestern respectfully requests Commission approval of its proposed PIRP Rider as submitted with an effective date of July 1, 2025.

Please add the following NorthWestern representatives to the service list for this docket:

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In accordance with ARSD §§ 20:10:01:39 - 42, NorthWestern respectfully requests confidential treatment of certain information contained in this filing. In compliance with ARSD § 20:10:01:41, material containing confidential information has been marked as “Confidential” and submitted electronically with this filing.

(1) NorthWestern requests confidential treatment of the following:

A. Documents that are confidential in their entirety:

Attachment A – Proposed cost of service and revenue recovery calculations as it contains proprietary and confidential information related to our Return on Equity as determined in Docket EL23-016.

(2) Duration of request: Forever

(3) Persons to be contacted regarding the confidentiality request:

Pamela A. Bonrud and Sarah Norcott (contact information above)

(4) Legal grounds for confidential treatment:

Confidential treatment is requested on the grounds that the material is trade secret, proprietary information as defined as confidential information by ARSD § 20:10:01:39(4) and (5).

(5) Factual grounds for confidential treatment:

The material qualifies for confidential treatment because it contains proprietary business information that NorthWestern does not disclose to the public. Disclosure of the material would result in material damage to NorthWestern's financial and/or competitive position. The confidentiality enhances NorthWestern's ability to negotiate terms that protect customers with regards to costs and NorthWestern's obligation to provide reliable service.

Please contact me or Jeff Decker with any questions you may have regarding this filing.

Sincerely,

Pamela A. Bonrud

Director-Government and Regulatory Affairs

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○ 605-978-2900

● 605-321-4025