



October 2, 2026

Ms. Leah Mohr
Executive Director
South Dakota Public Utilities Commission
State Capitol Building, 1st floor
500 E. Capitol Ave.
Pierre, SD 57501-5070

RE: Docket EL26-XXX – In the Matter of NorthWestern Energy Public Service Corporation, d/b/a NorthWestern Energy, for an Energy Conversion Facility Permit to Construct the Hub City Energy Park Natural Gas Generation Facility, Including a Natural Gas Transmission Pipeline, Near Aberdeen, South Dakota

Dear Ms. Mohr:

NorthWestern Energy Public Service Corporation, d/b/a NorthWestern Energy (“NorthWestern”), provides this letter of transmittal and submits the enclosed application to the South Dakota Public Utilities Commission (“Commission”) to construct the proposed Hub City Energy Park (“Project”) natural gas combustion turbine generation facility, including a natural gas transmission pipeline, near Aberdeen, South Dakota (“Application”) pursuant to South Dakota Codified Law Chapter 49-41B and Chapter 20:10:22 of the South Dakota Administrative Rules (“ARSD”). This Application is being filed at least six months after filing a notice of intent to construct the Project, which was filed on October 31, 2025, in Docket EL25-038. Also included with this letter of transmittal is NorthWestern’s Verification Statement that the information contained in this Application is true and correct.

The Application includes information regarding the need to construct the Project and all project components, including the combustion natural gas turbine generators and a short segment of natural gas transmission pipeline that is needed to supply natural gas for the Project. NorthWestern respectfully requests that the Commission make findings of fact and conclusions of law and grant a permit to construct the Project, including a natural gas transmission pipeline, on such terms and conditions as the Commission deems appropriate.

Commission communications with NorthWestern regarding this Application should be directed to:

Pamela A. Bonrud
Director Government and Regulatory Affairs
NorthWestern Energy
3010 W. 69th Street
Sioux Falls, SD 57108

Office: (605) 978-2900
Email: pam.bonrud@northwestern.com

Joshua Follman
Director Electric Supply Development
NorthWestern Energy
11 E. Park Street
Butte, MT 59701-1711
Office: (406) 498-3617
Email: joshua.follman@northwestern.com

with a copy to each of the following:

Sarah Norcott
Director Regulatory Corporate Counsel
NorthWestern Energy
208 N Montana Avenue, Suite 200
Helena, MT 59601
Office: (406) 443-8996
Email: sarah.norcott@northwestern.com

Jeffrey Decker
Regulatory Specialist
NorthWestern Energy
600 Market Street West
Huron, SD 57350-1318
Office: (605) 353-7560
Email: jeffrey.decker@northwestern.com

The Applicant's legal name is NorthWestern Energy Public Service Corporation, d/b/a NorthWestern Energy, with its principal place of business in Sioux Falls, South Dakota. NorthWestern is a corporation organized on December 3, 1923, under the laws of Delaware. NorthWestern provides retail electric service in South Dakota and retail natural gas service in South Dakota, and Nebraska.

In accordance with ARSD §§ 20:10:01:39 through 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 separately.

(1) NorthWestern requests confidential treatment of the following information:

A. Documents that contain confidential information are:

- a. Application, page 19
- b. Appendix J – Cultural Resources Report

(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).

(5) Factual grounds for confidential treatment:

The information redacted in the Application is the current estimate of the cost range for the Project. NorthWestern considers this information to be confidential, trade secret information as NorthWestern is currently negotiating with potential Engineering and Procurement Contractors and public disclosure of this information could increase costs for the Project and ultimately customers. The confidentiality enhances NorthWestern's ability to negotiate terms that protect customers with regards to costs and NorthWestern's obligation to provide reliable service. Disclosure of the information would result in material damage to NorthWestern's competitive position.

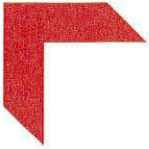
Appendix J includes the location of an identified archeological site at the Project. This information is required to be kept confidential to secure the site because if the exact location of a site is disclosed there is an increased threat of artifact looting or ground disturbance. Any artifact taken from the site loses its context and any ground disturbance by someone who feels it is their right to explore a known archaeological site disrupts the overall integrity of the site. Unauthorized ground disturbance can jeopardize intact cultural deposits or features below the ground surface.

Respectfully submitted,

NORTHWESTERN ENERGY

By: 

Pamela A. Bonrud
Director Government and Regulatory Affairs



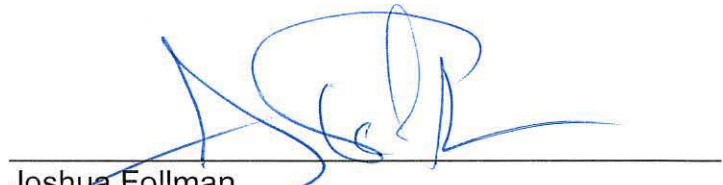
HUB CITY ENERGY PARK APPLICATION
VERIFICATION STATEMENT

State of Montana)
County of Silver Bow) :SS

Joshua Follman, being duly sworn, deposes and says that he is the authorized representative for NorthWestern Energy Public Service Corporation, d/b/a NorthWestern Energy.

He states that he does not have personal knowledge of all the facts recited in the forgoing application, but the information in the application has been gathered by and from employees, contractors of NorthWestern Energy, and that the information in the application is verified by him as true and correct on behalf of NorthWestern Energy.

Dated this 2 day of October, 2026.



Joshua Follman
Director Electric Supply Development
NorthWestern Energy Public Service Corporation,
d/b/a NorthWestern Energy

Subscribed and sworn before me this
2 day of October, 2026.



Notary Public
My Commission Expires:

