

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

In the Matter of the Application of
Montana-Dakota Utilities Co. for
Authority to Increase its Natural Gas
Rates

Docket No. NG12-008

**Petition to Intervene of the
Federal Executive Agencies**

THE FEDERAL EXECUTIVE AGENCIES' PETITION TO INTERVENE

In accordance with South Dakota Codified Law (SDCL) § 49-34A-13.1 and the Administrative Rules of South Dakota (A.R.S.D.) 20:10:01:15.02 and 20:10:01:15.03, the Federal Executive Agencies (FEA) through duly authorized counsel, hereby respectfully submits its Petition to Intervene in the above-captioned docket to the Public Utilities Commission of South Dakota (the Commission) In support of its Petition, the FEA states as follows:

1. The FEA consists of certain agencies of the United States Government which have offices, facilities, and/or installations in the service area of Montana-Dakota Utilities Company (Montana-Dakota) which purchase natural gas utility services from the Company. The Department of Defense has been delegated authority by the General Services Administration to represent, through Department of the Air Force counsel, the consumer interests of the FEA in this proceeding under 40 U.S.C. 121(d) and 501(c).

2. In accordance with A.R.S.D. 20:10:01:15:03, "a petition to intervene shall set out clearly and concisely the facts supporting the petitioner's alleged interest in the proceeding and, to the extent known, the position of the petitioner in the proceeding."

3. FEA customers will be directly impacted by the Commission's decision on Montana-Dakota's requested rate increase. Ellsworth Air Force base purchases significant amounts of natural gas from Montana-Dakota. In its application, Montana-Dakota proposes to move Ellsworth Air Force base from its own rate class to the Large Interruptible customer class. As a member of the Large Interruptible class, Ellsworth Air Force base will face a 9.8 percent bill increase under Montana-Dakota's filed rates. This substantial increase in utility costs would decrease the amount of funds available for Ellsworth's other operational expenses and thereby potentially cause significant impacts to mission capabilities. The nature and extent of FEA's financial and operational interest in the proceeding warrant status as an intervener.

4. FEA's interests in this matter are unique and will not be adequately represented by any other party.

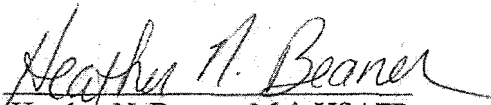
5. FEA timely requests intervention in this proceeding.

6. A copy of this petition has been served on all parties to this proceeding. Copies of all notices, orders or pleadings in this proceeding should be served on:

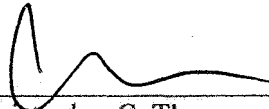
Maj Christopher Thompson
Staff Attorney
USAF Utility Law Field Support Center
AFLOA/JACE-ULFSC
139 Barnes Ave. Suite 1
Tyndall AFB, FL 32403
Phone: 850-283-6350
Chris.Thompson.2@tyndall.af.mil

WHEREFORE, for the reasons stated above, FEA respectfully requests that the Commission enter an order granting FEA's Petition to Intervene.

Respectfully submitted this 19 day of February 2013.



Heather N. Beamer, Maj, USAFR
Attorney for FEA
28 BW/JA
1000 Ellsworth Street, Suite 2700
Ellsworth AFB, SD 57706



Christopher C. Thompson, Maj, USAF
Attorney for FEA
USAF Utility Law Field Support Center
AFLOA JACE-ULFSC
139 Barnes Ave. Suite 1
Tyndall AFB, FL 32403
(*Pro Hac Vice* Pending)