



May 31, 2019

Ms. Patricia Van Gerpen
South Dakota Public Utilities Commission
500 E Capitol
Pierre, SD


RE: NG-___ - Proposed changes to Natural Gas Tariff Section 1 Index, Section 3 Rate Schedules and Section 6 Forms.

Dear Ms. Van Gerpen:

With this letter, NorthWestern Corporation, doing business as NorthWestern Energy (“NorthWestern”) is filing with the South Dakota Public Utilities Commission (the “Commission”) proposed revisions to its Natural Gas Tariff. NorthWestern respectfully requests Commission approval of these proposed revisions.

1. The documents submitted with this filing include:

- The current tariff with redline deletions
- The proposed revised tariff schedules in final form
 - Section 1, 13th Revised Sheet No. 2
 - Section 1, 2nd Revised Sheet No. 3
 - Section 3, 3rd Revised Sheet No. 1.1
 - Section 3, 11th Revised Sheet No. 3.1
 - Section 3, 8th Revised Sheet No. 3.2
 - Section 3, 4th Revised Sheet No. 3.3
 - Section 6, 6th Revised Sheet No. 2
 - Section 6, 8th Revised Sheet No. 3
 - Section 6, Original Sheet No. 3.1
 - Section 6, 6th Revised Sheet No. 4
 - Section 6, 5th Revised Sheet No. 5
 - Section 6, Original Sheet No. 5.1
 - Section 6, 4th Revised Sheet No. 6
 - Section 6, 5th Revised Sheet No. 7
 - Section 6, 4th Revised Sheet No. 8
 - Section 6, 1st Revised Sheet No. 8.1
 - Section 6, 7th Revised Sheet No. 9
 - Section 6, 1st Revised Sheet No. 9.1
 - Section 6, 1st Revised Sheet No. 9.2
 - Section 6, 1st Revised Sheet No. 9.3
 - Section 6, 3rd Revised Sheet No. 9.4
 - Section 6, 3rd Revised Sheet No. 9.5



Section 6, 4th Revised Sheet No. 10
Section 6, 2nd Revised Sheet No. 10.1
Section 6, 3rd Revised Sheet No. 11
Section 6, 2nd Revised Sheet No. 12
Section 6, Original Sheet No. 12.1
Section 6, Original Sheet No. 12.2
Section 6, 1st Revised Sheet No. 13
Section 6, 2nd Revised Sheet No. 14
Section 6, Original Sheet No. 14.1
Section 6, 3rd Revised Sheet No. 15
Section 6, 2nd Revised Sheet No. 15.1
Section 6, Original Sheet No. 15.2
Section 6, Original Sheet No. 16
Section 6, 3rd Revised Sheet No. 16.1
Section 6, 2nd Revised Sheet No. 16.2
Section 6, 1st Revised Sheet No. 17
Section 6, 1st Revised Sheet No. 18
Section 6, 2nd Revised Sheet No. 19
Section 6, Sheets 20 – 43 all revised to sheet left blank intentionally

A pdf file containing the revised New Customer Handbook

A pdf file containing the new Customer Service Guide.

2. The proposed effective date for the tariff revisions is July 9, 2019.
3. Brief description of the tariff changes:

Recently in docket EL19-014, NorthWestern received approval to update forms in its electric tariff. NorthWestern is now requesting approval of similar revisions to its natural gas tariff. The purpose of this filing is to remove unnecessary forms, update the natural gas tariff to incorporate forms utilized in the electric tariff for consistency purposes and eliminate the requirement of a contract requirement from the Rate 84 firm demand component.

South Dakota Administrative Rule 20:10:13:12 requires utilities to include standard delivery service forms within tariff schedules. SD AR 20:10:13:12 specifically references the obligation to file: (i) service applications; (ii) bills; (iii) contracts; (iv) delinquency and disconnect notices; (v) deposit receipts; and (vi) similar forms, but is not written as a comprehensive list of forms to maintain within tariff. NorthWestern is requesting approval to remove existing forms that fall outside of the scope of the types referenced in the applicable rule.

In light of the substantial change to the Section 6 forms tariff, the changes are best illustrated by submitting two versions of the proposed tariff revisions. The first document titled “Tariff Gas Forms Redline Deletions” shows the original tariff with proposed deletions. The second document titled “Tariff Gas Forms” shows the new proposed tariff with all changes made. A



description of each new tariff page follows. Each will describe the sheet number of where the document previously resided if an existing tariff sheet was moved to a new location. New forms will also be described as needed.

Section 1, Sheets 2 and 3

An update to the index pages is required to reflect the changes in Section 6 of the tariff.

Section 3, Sheet 1.1

Sheet 1.1 contains the rate that the NNG farm tap customers were served under. NorthWestern no longer serves these customers and it is appropriate to remove this rate schedule from the tariff.

Section 3, Sheets 3.1 -3.3

NorthWestern proposes the elimination of the requirement of a contract for the demand therms. This requirement is administratively burdensome and results in no benefit to customers or NorthWestern. The method of establishing the demand volume is described in item 7 of Section 3, Sheet 3. The proposed method of establishing daily firm demand under Rate 84 is consistent with existing practice. Accordingly, the only substantive change is the removal of the contract requirement.

Section 6, Sheet 2

Sheet 2 is the disconnect notice that was previously listed on sheet 3 of the prior forms tariff. There are no updates to the tariff page.

Section 6, Sheet 3

Sheet 3 contains the web address of the Customer Service Guide and New Customer Handbook. The New Customer Handbook has been updated to reflect current information and process. This information was previously located beginning on page 20 of the section 6 tariff.

The Customer Service Guide is a new document that contains construction guidelines for electric and natural gas services. The guide contains contact information for the construction departments, service location guidelines, customer trenching guidelines, electric clearances, tree planting, etc.

The Customer Service Guide and New Customer Handbook will not be displayed in detail in the forms pages but can be referenced online. A pdf of each is included in this filing.

Section 6, Sheet 3.1

Sheet 3.1 is the construction application form. This is a revised form that a new customer will fill out to begin the process for a new service. This form is reflective of sheet 19 of the prior tariff. After receiving the form, NorthWestern will visit the service location and prepare construction estimates for the customer. The customer will then



be given the construction agreement contained in sheets 9 – 9.4 to contract for the service, including any applicable construction contributions.

Section 6, Sheet 4

Sheet 4 is the Guarantor of Service form that is included in the electric tariff. This form was not previously included in the natural gas tariff.

Section 6, Sheet 5

Sheet 5 is the Customer Dispute Letter that is included in the electric tariff. This form was not previously included in the natural gas tariff.

Section 6, Sheet 5.1

Sheet 5.1 is the Customer Dispute Form questionnaire that is included in the electric tariff. This form was not previously included in the natural gas tariff.

Section 6, Sheet 6

Sheet 6 is the letter to Add Co-Responsible Party that is included in the electric tariff. This form was not previously included in the natural gas tariff.

Section 6, Sheet 7

Sheet 6 is the One Time Release form that is included in the electric tariff. This form was not previously included in the natural gas tariff.

Section 6, Sheet 8

Sheet 6 is the Letter of Authorization that is included in the electric tariff. This form was not previously included in the natural gas tariff.

Section 6, Sheets 9 – 9.3

Sheets 9 – 9.4 contain the new Utility Construction Agreement. Part of this information was previously contained in sheet 19. This is the second step of the process described under sheet 3.1 above. The Utility Construction Agreement is the final step of the customer and NorthWestern agreeing to the terms of the installation of a new utility service. This agreement provides a greater detailed agreement than what was included in the previous tariff.

Section 6, Sheet 10

Sheet 10 is the EZ Pay Letter for a customer interested in signing up for the program under the agreement on sheet 10.1. This form was not previously included in the natural gas tariff.

Section 6, Sheet 10.1

Sheet 10.1 is the EZ Pay Form agreement for a customer to initiate EZ pay. This form was not previously included in the natural gas tariff.



Section 6, Sheet 11

Sheet 11 was not included in the previous forms tariff. This agreement allows the utility to notify another party when an account receives notification of termination of services.

Section 6, Sheets 12 – 12.2

Sheets 12 – 12.2 contain the Continuous Service Agreement for landlords. This information was previously contained in sheets 41 – 43 of the tariff. There are no updates to the tariff page.

Section 6, Sheet 13

Sheet 13 contains the Service Request For Contract Sales. This is the form that a customer completes when they desire to be served under rate 86. This form was previously located on sheet 9.3 of the tariff.

Section 6, Sheets 14 – 14.1

Sheets 14 and 14.1 contains the agreement for the commodity price for a rate 86 customer desiring to contract their natural gas commodity price for the upcoming winter. These forms were previously located on sheets 9.4 and 9.5.

Section 6, Sheets 15 – 15.2

Sheets 15 through 15.2 contain the Transportation Service Request Form. These forms were previously located on sheets 24.1 – 24.3.

Section 6, Sheets 16 – 16.2

Sheets 16 through 16.2 contain the Transportation Service Group Balancing Request Form. These forms were previously located on sheets 25.1 – 25.3.

Section 6, Sheet 17

The Transportation Service Designation form was previously located on sheet 26.

Section 6, Sheet 18

The Request For Telemetry Service form was previously located on sheet 27.

Section 6, Sheet 19

The Extended Service Agreement form was previously located on sheet 28.

4. Reasons for the proposed tariff changes:

Reduction of the administrative burden of both NorthWestern and the Commission by eliminating unnecessary letters and forms from the tariff. Update to the tariff to include additional relevant forms as described above.



5. Number of customers whose cost of service will be affected and annual changes in cost of service to such customers.

NorthWestern currently serves approximately 47,000 natural gas customers in South Dakota. While the changes apply to all customers, there will be no changes in revenue or cost of service due to the proposed tariff revisions.

Sincerely,

Jeff J. Decker

Regulatory Specialist

jeff.decker@northwestern.com

O 605-353-8315