



August 23, 2019

Ms. Patricia Van Gerpen, Executive Director
South Dakota Public Utilities Commission
State Capitol Building
Pierre, SD, 57501

Dear Ms. Van Gerpen:

Re: Gas Transportation Tariff Change - Fuel Retention Percentage

Dear Ms. Van Gerpen:

Enclosed is 24th Revised Sheet No. 6.2 of Section No. 5 of NorthWestern's filed Natural Gas Tariff. This filing is made to comply with the fuel retention provisions of Paragraph 7 of the Gas Transportation Tariff General Terms and Conditions. Those provisions call for the retention percentage for the Company's South Dakota distribution system to be adjusted annually, to be effective October 1, and based on the actual percentage incurred by the Company for the prior 12 month period ending July 31.

The new fuel retention percentage proposed to be effective October 1, 2019 is 2.08%. The retention percentage currently effective is 2.36%. The retention percentages effective October 1, 2016 and 2017 were 1.81% and 2.00%, respectively. Exhibit A, attached, shows the computation of the actual percentage incurred by the Company for the twelve-month period ending July 31, 2019.

This filing also contains an updated fuel rate for large volume customers with daily average use greater than 30,000 therms. These customers are primarily direct connect customers whose gas systems are not subject to the normal losses of a distribution system. There is currently one customer that is served under this rate. The proposed rate is 0.56% compared to last year's rate of 0.64%.

NorthWestern requests approval for an effective date of October 1, 2019

Sincerely,

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