BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF)	
PETITION OF THE SOUTH DAKOTA INTRASTATE PIPELINE COMPANY FOR A WAIVER OF LOSS AND UNACCOUNTED)))	Docket No. NG 20-009
CALCULATION FOR 2021, OR IN THE ALTERNATIVE, A DETERMINATION OF THE OF LOSS AND UNACCOUNTED FOR 2021))	LOSS AND UNACCOUNTED ADJUSTMENT PERCENTAGE FILING

The South Dakota Intrastate Pipeline Company ("SDIP"), hereby makes and files this Loss and Unaccounted Adjustment Percentage ("L&U") filing. SDIP is to establish a L&U on an annual basis to be filed with and approved by the Commission and effective each January 1. The initial L&U percentage was established at 1.34% in a Settlement Agreement as approved by the Commission in a July 6, 2018 Order. Pursuant to a Settlement Stipulation entered into effective January 3, 2020, and as later approved by the Commission, the L&U was adjusted to 0.14%.

In support of this filing, SDIP state as follows:

- For over 25 years, SDIP transported natural gas for MDU on SDIP's Pipeline and MDU was the sole customer of SDIP;
- 2. Various meters exist on SDIP's pipeline measuring MDU's output of natural gas, however multiple locations on the pipeline contain no MDU metering of gas;
- On or about April 2019, Ring-Neck Energy & Feed, LLC, dba Ring-Neck Energy, LLC ("Ring-Neck") began receiving gas through SDIP's pipeline;
- 4. Ring-Neck's receipt of gas is metered at a meter station in Onida, South Dakota;

- During 2020, MDU has added meters at MDU's take-off points in order to measure gas going into MDU's distribution system and MDU will continue to add meters;
- 6. Since SDIP only transported natural gas for MDU, prior to Ring-Neck taking natural gas, it was not necessary for MDU to have meters at MDU's take-off points;
- SDIP's 2020 leak survey on its pipeline completed on September 23, 2020, determined that leaks do not exist on SDIP's pipeline;
- 8. Based upon information provided to SDIP by MDU regarding measured receipts and measured deliveries, the current L&U is estimated to be either 0.0% or 0.14%; and
- 9. SDIP makes this filing without attesting to the accuracy of the estimated L&U. Such filing is made in order to comply with the previous stipulation.

WHEREFORE, SDIP requests that the L&U remain at 0.14% and that both MDU and Ring-Neck have the opportunity to address the appropriate L&U for the year 2021.

Dated this 21st day of October, 2020.

MORENO, BACHAND, HRUSKA & SCHEIBE, P.C.

By: /s/ Paul E. Bachand

PAUL E. BACHAND
Attorneys for SD Intrastate Pipeline Company
PO Box 1174
Pierre, SD 57501-1174
605-224-0461
pbachand@pirlaw.com