



January 20, 2023

Ms. Patricia Van Gerpen
South Dakota Public Utilities Commission
State Capitol Building, 1st Floor
500 E. Capitol Ave.
Pierre, SD 57501

via eFiling

Re: *Request for Approval of a Contract with Deviations with Brookings Biogas LLC*

Dear Ms. Van Gerpen:

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

Pursuant to ARSD 20:10:13:36 and ARSD 20:10:13:39 NorthWestern states:

1. *The documents submitted with this filing include:*

- The proposed revised tariff schedule, Section No. 4, 2nd Revised Sheet No. 3, Summary List of Contracts with Deviations, which includes a reference to the RNG Transportation Service Agreement (the “Agreement”) between NorthWestern and Brookings Biogas LLC (“Customer”) and the information required by ARSD 20:10:13:09.
- A copy of the executed proposed Agreement, for which confidential treatment is being requested, pursuant to ARSD 20:10:01:41
- Exhibit A: Request for Confidential Treatment
- Exhibit B: Confidential work papers showing the calculation of the project cost and cost recovery
- Exhibit C: Map of the pipeline and diagram of the renewable facility

2. *The proposed effective date is March 1, 2023.*

3. *The names and addresses of those to whom this filing has been emailed:*

Brookings Biogas LLC
Attn: Veronika Dornburg
500 N. Akard Street, Suite 1500
Dallas, TX 75201
Veronika@SevanaBioenergy.com



4. *Brief description of the proposed tariff changes:*

Customer intends to build a production and refinement complex commonly known as the Global Dairy, which is located at 46844 SD-28, Estelline, SD. Customer intends to deliver renewable natural gas (“RNG”) produced from this facility to NorthWestern for the purpose of transportation. The location of the project and a diagram of the facilities are illustrated in Exhibit C.

To maximize this interconnection, the Customer intends to deliver RNG produced from multiple dairy farms. Preconditioned RNG will be transported via a Customer-owned and operated pipeline from two dairy facilities located south of Global Dairy to the production and refinement complex at Global Dairy. The Customer will own, operate and be responsible for the RNG production and the refinement complex. In order to deliver RNG to NorthWestern for transportation, the Customer will pressurize the RNG. NorthWestern will tap the Customer piping to sample and test the RNG in an automated quality assurance building. This will ensure the RNG meets pipeline-quality specifications before it enters NorthWestern’s pipeline. Rejected RNG will be rerouted back to the Customer’s facility for reconditioning. Once accepted into NorthWestern’s facilities, the RNG will be transported on a newly constructed 4” steel pipeline 1.89 miles, then injected into NorthWestern’s existing 8” steel pipeline.

The Agreement includes provisions to secure project costs and guarantee delivery volumes to support the project recovery over a 15-year period. Project costs and tariff delivery charges will be recovered through Tariff Rate No. 87. The annual take-or-pay volume for this Agreement is 700,000 MMBtu. An annual review will be conducted to determine if volumes met the volumetric requirement defined in the Agreement.

The deviations from Tariff requested in this filing include:

- Annual take-or-pay volume requirements
- Required letter of credit or other security from Customer
- Natural gas quality requirements
- Termination conditions as set forth in the Agreement

Except for the deviations described above, Customer will be served under the Tariff Rate No. 87, and all other conditions of the general terms and conditions.

5. *Reasons for the proposed tariff changes:*

NorthWestern desires to provide the Customer with RNG transportation service. The additional protections included in this Agreement provide security for NorthWestern and its legacy customers.



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

Brookings Biogas LLC will be the only customer affected by this filing.

Sincerely,

Jeff J. Decker

Regulatory Specialist

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