

**Docket Number:** NG23-015  
**Subject Matter:** First Data Request  
**Request to:** NorthWestern Energy (NorthWestern or Company)  
**Request from:** South Dakota Public Utilities Commission Staff  
**Date of Request:** September 8, 2023  
**Responses Due:** September 14, 2023

1-1. Provide the number of times interruptible customers were interrupted since 2018. Provide the number of customers interrupted for each interruption and the length of each interruption if available.

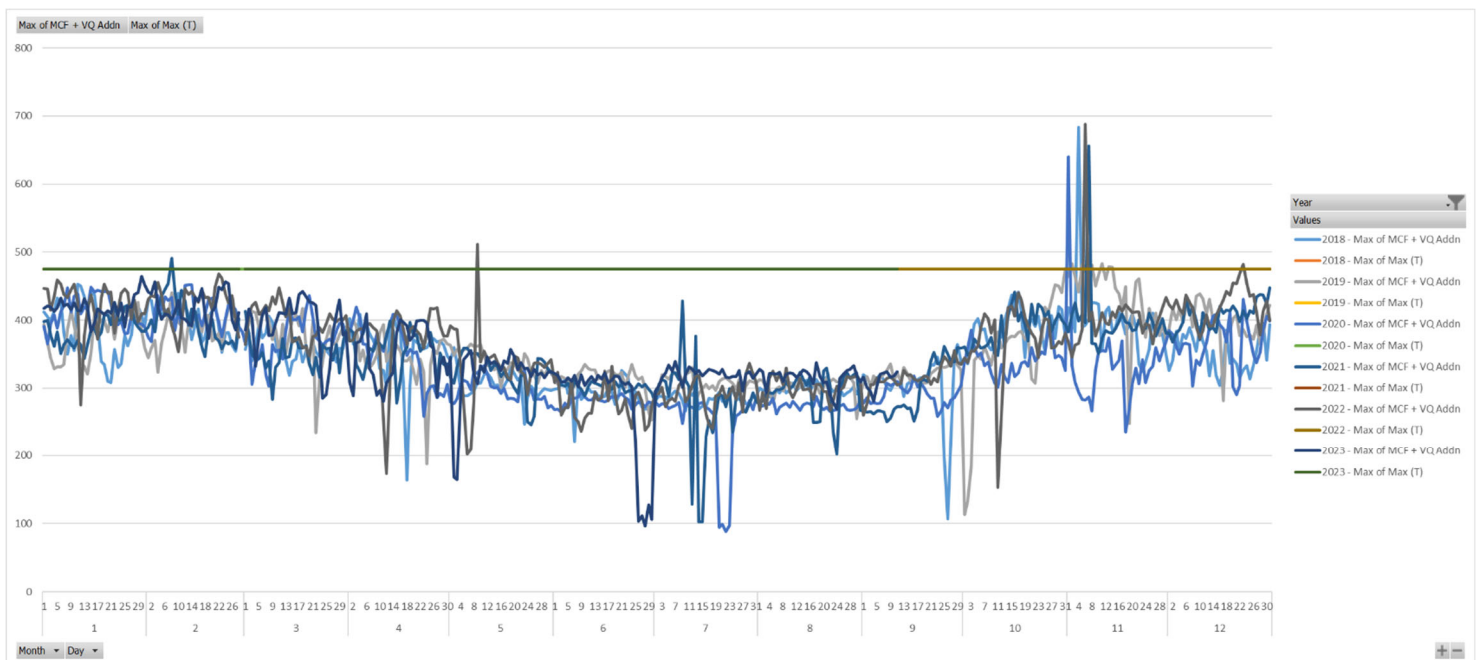
**Response:**

There have been no curtailments since 2018. In peak corn drying seasons, large dryers in the Castlewood/Estelline area have been asked to work together to control their usage so the dryers in that area remain in operation during the peak usage periods.

1-2. How often does NorthWestern anticipate Valley Queen will be interrupted?

**Response:**

Based on data collected since 2018, NWE estimates that 9% of the time, there is a risk to Valley Queen (VQ) of partial or total curtailment based on conditions on the transmission system feeding Milbank. The chart below shows the at-risk period. This period is any point where the new load from VQ, plus the historic use at any given time is greater than the known historical flow amount at the tap. Above this amount, ability to transmit gas to Milbank will be determined by multiple other loads on the line, which may or may not result in VQ being curtailed. It is important to note that this improvement project is to mitigate shortfalls in the capability of the Milbank distribution system to transport gas from the TBS to the VQ plant. These shortfalls need to be addressed for VQ to grow, whether their growth is firm or interruptible. This project does not address the transmission system, which is expected to be the driver of curtailment.



*\*note: this chart represents the maximum hourly flow/day. Because of the large quantity of data points, showing every hour on this chart is not feasible. There may be multiple at risk hours in each day.*

- 1-3. Provide a revised tariff sheet that labels Valley Queen’s contracts with deviations as firm and interruptible.

**Response:**

See the attached Tariff containing the proposed change.

- 1-4. Refer to the map on page 11 of the Interruptible Transportation Service Agreement (TSA) and the map in Exhibit C.

**Response:**

- a. The line immediately to the east of Valley Queen is labeled as “New 6” plastic pipe – to be installed” on page 11 of the TSA, and the next segment of pipe is labeled “Existing plastic pipe – to be replaced with 6” pipe”; however, Exhibit C has this entire stretch labeled as “New 6” line upgrade”. Explain this discrepancy between the two maps. Is the segment labeled “New 6” plastic pipe – to be installed” on page 11 of the TSA a segment where no pipe currently exists?
- b. Confirm the segment immediately to the south of the Milbank E. TBS is a pipe replacement.
- c. Confirm there will now be two pipes bringing gas to Valley Queen, but there will still be just one meter.

**Response:**

- a. The map in Exhibit C only serves to show the sections of line that will require construction effort. It is not meant to delineate between removal and replacement, and new construction. On page 11, the section labeled “Existing plastic pipe – to be replaced with 6” plastic pipe” is currently under sized, will be retired and replaced with 6”. The section labelled “New 6” plastic pipe – to be installed” is where no line exists today.
- b. That is correct. This line is undersized and will be retired and replaced.
- c. That is correct.

1-5. Provide the construction cost estimate NorthWestern provided Valley Queen to provide them additional firm service.

**Response:**

Please see confidential file 1-5 Service Options.pdf.