

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of Black Hills/Nebraska Gas )  
Utility Company, LLC, d/b/a Black Hills )  
Energy, Omaha, seeking Approval of its Cost of )  
Service Gas Hedge Agreement with Black Hills )  
Utility Holdings, Inc. )  
)  
)

Application No. NG-0086

PETITION OF FORMAL  
INTERVENTION

Pursuant to Neb. Admin. Code Title 291, Chpt. 1, §015.01, the Nebraska Public Advocate hereby petitions the Nebraska Public Service Commission to allow him to formally intervene in the above-captioned matter and to become a party hereto for all purposes as regards the application by Black Hills/Nebraska Gas Utility Company, LLC, d/b/a Black Hills Energy, Omaha, (1) seeking an order authorizing the company to enter into a Cost of Service Gas Hedge Agreement with Black Hills Utility Holdings, Inc.; (2) approving revised tariff sheets and authorizing the recovery of amounts incurred under the Cost of Service Agreement from customers through the purchased gas adjustment and annual cost adjustment clauses contained in the Company's tariffs; (3) approving the requested 50% Hedge-participation level based on the Company's forecast annual firm gas demand or, in the alternative, a revised percentage that the Commission may determine; and (4) to the extent necessary, granting any waivers from affiliate rules or regulations or ring fencing commitments.

In support of his petition to formally intervene, the Nebraska Public Advocate states as follows:

1. Correspondence or communications regarding this petition, including service of all notices and orders of the Nebraska Public Service Commission should be addressed to:

William F. Austin  
Colin A. Mues  
Nebraska Public Advocate  
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The interest of intervener is predicated upon his statutory duty as Public Advocate to represent the interests of Nebraska citizens and all classes of jurisdictional utility ratepayers, other than high volume ratepayers, in matters involving jurisdictional utilities and to investigate the legality and reasonableness of rates, charges, and practices of jurisdictional utilities. Neb. Rev. Stat. § 66-1831 authorizes the Public Advocate to petition for relief, request, initiate and intervene in any proceeding before the Commission concerning such utilities. The grounds upon which the intervention is made include, but are not limited to, the nature of the application filed by Black Hills/Nebraska Gas Utility Company, LLC, d/b/a Black Hills Energy, Omaha, as falling within the statutory responsibilities of the Public Advocate and the need for the Public Advocate to participate fully in these proceedings. This statutory duty cannot be performed adequately by any other party to this proceeding.

WHEREFORE, the Nebraska Public Advocate hereby respectfully requests the Commission, for the reasons described above, to grant his petition to formally intervene and hold a hearing on the Application.

DATED this 9<sup>th</sup> day of October, 2015.

PUBLIC ADVOCATE

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By:   
William F. Austin, #10140  
Colin A. Mues, #24050

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing Petition of Formal Intervention was served electronically on this 9<sup>th</sup> day of October, 2015, upon the following:

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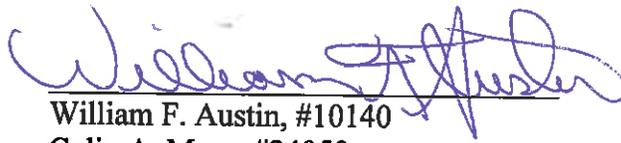
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