

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

IN THE MATTER OF THE APPLICATION OF)	DOCKET NO. NG-124
BLACK HILLS NEBRASKA GAS, LLC, d/b/a)	
BLACK HILLS ENERGY, RAPID CITY,)	
SOUTH DAKOTA, SEEKING A GENERAL)	FILED: May 30, 2025
RATE INCREASE)	
_____)	

THE FEDERAL EXECUTIVE AGENCIES' PETITION TO INTERVENE

Pursuant to Neb. Admin Code Title 291, Chpt. 1, §002.12A and §002.12C, the Federal Executive Agencies (FEA), through their undersigned counsel, hereby submit this Formal Intervention and Protest in the aforementioned matter to become a party for all purposes regarding the application by Black Hills Nebraska Gas, LLC d/b/a Black Hills Energy ("BHE") for general rate increase.

In support thereof, FEA states the following:

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

ALETA S. KRETZER
Senior Legal Counsel
900 SAC Blvd, Bldg 1000, Rm N3 150
Offutt AFB, NE 68113
(402) 912-0275
Aleta.S.Kretzer.civ@mail.mil

LESLIE R. NEWTON, Maj, USAF
AFLOA/JAOE-ULFSC (primary for paper copy)
139 Barnes Drive, Suite 1
Tyndall Air Force Base, Florida 32403
(850) 283-6347
Leslie.Newton.1@us.af.mil

THOMAS A. JERNIGAN
AFCEC/JA-ULFSC

ASHLEY N. GEORGE, Capt, USAF
AFLOA/JAOE-ULFSC
139 Barnes Drive, Suite 1
Tyndall Air Force Base, Florida 32403
(850) 283-6289
Ashley.George.4@us.af.mil

MICHAEL A. RIVERA
AFLOA/JAOE-ULFSC

139 Barnes Drive, Suite 1
Tyndall Air Force Base, Florida 32403
(850) 283-6663
Thomas.Jernigan.3@us.af.mil

JAMES B. ELY
AFLOA/JAOE-ULFSC
139 Barnes Drive, Suite 1
Tyndall Air Force Base, Florida 32403
(850) 283-6175
James.Ely@us.af.mil

MIKE GORMAN
BAI Consultant
P.O. Box 412000
St. Louis, MO 63141
(636) 898-6725
Mgorman@consultbai.com

139 Barnes Drive, Suite 1
Tyndall Air Force Base, Florida 32403
(850) 283-6348
Michael.Rivera.51@us.af.mil

EBONY M. PAYTON
AFCEC/CN-ULFSC
139 Barnes Drive, Suite 1
Tyndall Air Force Base, Florida 32403
(850) 283-6236
Ebony.Payton.ctr@us.af.mil

2. The FEA consists of certain agencies of the United States Government which have offices, facilities, and/or installations in the service area of BHE. The Department of Defense has been delegated authority by the General Services Administration to represent, through Department of the Air Force counsel, the consumer interest of the FEA in these proceedings under 40 U.S.C. §§ 501(c) and 121(d).

3. In this case, the Nebraska Public Service Commission ("Commission") will consider BHE's request for a general base rate increase and approval of its revenue increase. Utility costs represent one of the largest variable expenses of operating federal offices, facilities, and installations on whose behalf intervention is sought herein, and all will be significantly affected by any action the Commission takes in this matter. For these reasons, the FEA has a substantial interest in the above-captioned matter.

The FEA reserves all rights to raise additional issues in accordance with the Commission's rules and anticipated Order Establishing Procedure in this case. Because the FEA includes federal offices, facilities, and installations that are BHE ratepayers and will be

significantly affected by any action the Commission takes in this matter, the FEA has substantial interests that are subject to determination in this docket. Therefore, the FEA is entitled to intervene and participate in the proceedings, which will determine the fair, just, and reasonable rates to be charged by BHE.

WHEREFORE, the FEA respectfully requests permission to intervene as a full party in this matter and the Commission enters an order granting this petition and thereby allowing the FEA to intervene and participate as a full party in this matter.

Respectfully submitted this 30th day of May, 2025.

Attorneys for Federal Executive Agencies

By: /s/Aleta S. Kretzer

Aleta. S. Kretzer
Leslie R. Newton, Maj, USAF
Ashley N. George, Capt, USAF
Michael A. Rivera, Capt, USAF
Thomas A. Jernigan
AF/JAOE-ULFSC
139 Barnes Drive, Suite 1
Tyndall Air Force Base, Florida 32403
(850) 283-6347
aleta.s.kretzer.civ@mail.mil
leslie.newton.1@us.af.mil
ashley.george.4@us.af.mil
michael.rivera.51@us.af.mil
thomas.jernigan.3@us.af.mil

CERTIFICATE OF SERVICE
Docket Nos. NG-124

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail this 30th day of May, 2025, to the following:

Nebraska Public Service Commission Thomas Golden Nichole Mulcahy Johnathan Smith Deena Ackerman Alex Timperly PSC.naturalgas@nebraska.gov Thomas.golden@nebraska.gov nichole.mulcahy@nebraska.gov jon.smith@nebraska.gov deena.ackerman@nebraska.gov alex.timperley@nebraska.gov	Black Hills Energy Douglas J. Law Margaret McGill Adam Buhrman Kevin Jarosz Tatyana Bannan Jill Becker Becky Purington Callie Tysdal Douglas.law@blackhillscorp.com Margaret.mcgill@blackhillscorp.com Adam.buhrman@blackhillscorp.com Kevin.jarosz@blackhillscorp.com Tatyana.bannan@blackhillscorp.com Jill.becker@blackhillscorp.com Becky.purington@blackhillscorp.com Callie.tysdal@blackhillscorp.com
Public Advocate Chris Dibbern dibbernlaw@gmail.com	Blue Ridge Consulting Services, Inc. Donna Mullinax dmullinax@blueridgecs.com
Bates White LLC Vincent Musco Jim DeMetro Karen Morgan Vincent.musco@bateshite.com Jdemetro60@gmail.com Karen.Morgan@bateswhite.com	Perry Law Firm Derek Aldridge daldridge@perrylawfirm.com
Federal Executive Agencies Aleta Kretzer Leslie Newton Ashley George	

Michael Rivera Thomas Jernigan Ebony M. Payton James Ely Mike Gorman Aleta.S.Kretzer.civ@mail.mil Leslie.Newton.1@us.af.mil Ashley.George.4@us.af.mil Michael.Rivera.51@us.af.mil Thomas.Jernigan.3@us.af.mil Ebony.Payton.ctr@us.af.mil James.Ely@us.af.mil mgorman@consultbai.com	
--	--

/s/Ebony M. Payton

Ebony M. Payton
Paralegal for FEA

NAME OF AGENCY, DEPARTMENT, BOARD, OR COMMISSION

**MOTION FOR PRO HAC VICE ADMISSION IN AN
AGENCY, DEPARTMENT, BOARD, OR COMMISSION**

Case No. _____

(To be completed by associated counsel licensed in Nebraska).

_____ hereby moves this administrative agency,
department, board, or commission to grant _____
admission pro hac vice in the above-captioned proceeding, as co-counsel for the
_____.

_____ is a resident of Nebraska, duly and
regularly admitted to practice in the courts of record of this state, and service may
be had in all matters connected with this action.

_____, or my designee who shall be licensed
to practice in the courts of record of this state, will sign all pleadings, motions,
and papers filed in the case, as well as personally appear at all proceedings before
the court, unless excused by the court.

In support of this motion, please see the attached application signed by the
applicant.

Wherefore, _____, respectfully moves this
administrative agency, department, board, or commission for admission pro hac
vice for _____ in the above-captioned case.

/s/

Attorney Name (Bar Number)

Firm Name

Street Address/P.O. Box Number

City/State/ZIP Code

Telephone

E-mail Address

APPLICATION FOR PRO HAC VICE ADMISSION

(To be attached to Motion for Admission Pro Hac Vice)

Attorney Name: _____

Caption: _____

Case Number: _____

_____, desiring admission pro hac vice in the
above-stated matter, affirms as follows:

_____ is an attorney admitted and eligible
to practice law in _____ and is a member in good
standing in _____.

_____ is not the subject of a disciplinary
action or investigation. (If subject to a disciplinary action or investigation,
complete next paragraph).

_____ is the subject of a disciplinary action
or investigation in _____ and the name and address of
the disciplinary authority is:

_____.
The nature and status of the disciplinary action or investigation is

_____.
(Please attach additional pages if necessary).

_____, upon admission pro hac vice, will
be subject to the Rules of Professional Conduct, Neb. Ct. R. of Prof. Cond.
§§ 3-501.0 to 3-508.5.

_____ has associated with the following
attorney who is duly and regularly admitted to practice in the courts of record of this
state, and upon whom service may be had in all matters connected with the action:

Name of Local Counsel and Bar Number: _____ .

_____ has paid the \$250 fee to the agency,
department, board, or commission.

/s/

Attorney Name (Foreign Bar Number)

Firm Name

Street Address/P.O. Box Number

City/State/ZIP Code

Telephone

E-mail Address

NAME OF AGENCY, DEPARTMENT, BOARD, OR COMMISSION

, Case No. _____

**OATH SUBSCRIBED TO BY
PRO HAC VICE APPLICANT**

I, the undersigned attorney, do solemnly swear that I will support the Constitution of the United States, and the Constitution of the State of Nebraska, and that I will faithfully discharge the duties of an attorney and counselor, according to the best of my ability.

Dated this _____ day of _____, 20____ .

Attorney

Subscribed and sworn to before me this _____ day of _____, 20____ .

Person Administering Oath pursuant to
statutory authority for administrative agencies,
departments, boards, or commissions.



DEPARTMENT OF THE AIR FORCE
OFFICE OF THE JUDGE ADVOCATE GENERAL
OPERATIONS AND INTERNATIONAL LAW

30 May 2025

Capt Ashley George
AFLOA/JAOE-ULFSC
139 Barnes Drive, Ste. 1
Tyndall AFB, FL 32403
(850) 283-6289

Attorney Services
Nebraska Bar Association
Room 2413, State Capitol
1445 K Street
Lincoln, NE 68509
Attn: Joshua R. Shasserre, Clerk

Dear Mr. Shasserre,

I am an attorney for the military assigned with the Utility Law Field Support Center. In my duties, I represent the Department of Defense and the Federal Executive Agencies (FEA) in matters that arise before the Nebraska Public Service Commission. Currently, the FEA is seeking to become a party to a Cause (NG-124) before the Commission in the matter dealing with Black Hills Nebraska Gas, LLC d/b/a Black Hills Energy's application for a rate modification.

Since I represent the FEA, I request that the Nebraska Bar Association waive the requirement for payment of the \$250.00 application fee for the attorneys submitting a pro hac vice application. I will not profit personally from any representational activities in Nebraska, I will only represent the interests of the FEA.

Thank you for your consideration of my request. If you have any questions, please give me a call at 850-283-6289, or via email at Ashley.George.4@us.af.mil.

Sincerely,

A handwritten signature in blue ink that reads "Ashley N. George".

ASHLEY N. GEORGE, Capt, USAF
Utility Law Field Support Center
Federal Executive Agencies

NAME OF AGENCY, DEPARTMENT, BOARD, OR COMMISSION

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Firm Name

Street Address/P.O. Box Number

City/State/ZIP Code

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Name of Local Counsel and Bar Number: _____ .

_____ has requested waiver of the \$250 fee to the agency, department, board, or commission.

/s/

Attorney Name (Foreign Bar Number)

Firm Name

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Dated this _____ day of _____, 20____.

Attorney

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DEPARTMENT OF THE AIR FORCE
OFFICE OF THE JUDGE ADVOCATE GENERAL
OPERATIONS AND INTERNATIONAL LAW

30 May 2025

Thomas A. Jernigan
AFLOA/JAOE-ULFSC
139 Barnes Drive, Ste. 1
Tyndall AFB, FL 32403
(850) 283-6663

Attorney Services
Nebraska Bar Association
Room 2413, State Capitol
1445 K Street
Lincoln, NE 68509
Attn: Joshua R. Shasserre, Clerk

Dear Mr. Shasserre,

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Sincerely,

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THOMAS A. JERNIGAN
Utility Law Field Support Center
Federal Executive Agencies

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30 May 2025

Maj Leslie R. Newton
AFLOA/JAOE-ULFSC
139 Barnes Drive, Ste. 1
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Leslie R Newton

LESLIE R. NEWTON, Maj, USAF
Utility Law Field Support Center
Federal Executive Agencies

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DEPARTMENT OF THE AIR FORCE
OFFICE OF THE JUDGE ADVOCATE GENERAL
OPERATIONS AND INTERNATIONAL LAW

29 May 2025

Capt Michael Rivera
AFLOA/JAOE-ULFSC
139 Barnes Drive, Ste. 1
Tyndall AFB, FL 32403
(850) 283-6348

Attorney Services
Nebraska Bar Association
Room 2413, State Capitol
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Thank you for your consideration of my request. If you have any questions, please give me a call at 850-283-6348, or via email at Michal.Rivera.51@us.af.mil.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael Rivera", is written over a horizontal line. The signature is stylized with a large loop and a long horizontal stroke extending to the right.

MICHAEL RIVERA, Capt, USAF
Utility Law Field Support Center
Federal Executive Agencies