BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of the Commission, to conduct)	Application No. NG-115.1
a review of gas supply cost adjustment)	
schedules implemented by NorthWestern)	MOTION FOR LEAVE
Energy Public Service Corporation d/b/a)	TO SUBMIT PREFILED
NorthWestern Energy, Sioux Falls, South)	STATEMENT
Dakota, pursuant to Neb. Rev. Stat. § 66-)	
1854.		

NorthWestern Energy Public Service Corporation, d/b/a NorthWestern Energy ("NorthWestern"), by and through its attorneys of record, respectfully moves the Nebraska Public Service Commission ("Commission"), pursuant to Neb. Admin. Code, tit. 291, ch. 1, § 002.05, to grant NorthWestern leave to submit a prefiled statement in advance of the October 22, 2024, hearing and in advance of the October 11, 2024, deadline established by the Commission for the Natural Gas Department to file its recommendations and comments related to the Commission consultant's audit report. In support of this Motion, Northwestern states and alleges as follows:

- 1. On or about August 28, 2024, the Commission's consultant timely issued a report from the audit it conducted in the above proceeding.
- 2. By its Order of April 30, 2024, the Commission allowed NorthWestern to submit "responses, comments, and/or recommendations on [the] audit report" on or before September 23, 2024. NorthWestern had no comment on the report and therefore did not submit any written response.
- 3. Following the September 23 deadline, NorthWestern was contacted by Commission staff, who expressed concerns about having an insufficient record in the absence of a response by NorthWestern to the audit report. By its Order of April 30, 2024, the Natural Gas

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¹ Order Setting Procedural Schedule and Notice of Hearing, NG-115.1 (April 30, 2024).

Department has until October 1, 2024, to file its recommendations and comments on the audit

report and record (if necessary). So that the Department has a more complete record upon which

to comment, NorthWestern wishes to file a Prefiled Statement that it will ultimately make at the

October 22 hearing. NorthWestern wishes to file its Prefiled Statement expeditiously so as to allow

the Department to best comment and make recommendations based on the record by its October

11 deadline.

4. A copy of the Prefiled Statement NorthWestern wishes to make is attached to this

Motion as Attachment A.

FOR THE ABOVE REASONS, NorthWestern respectfully requests the

Commission grant it leave to submit its Prefiled Statement, memorialized in

Attachment A, and, assuming said motion is granted, Protestants hereby respectfully

submits said Prefiled Statement.

DATED: October 1, 2024

NORTHWESTERN ENERGY PUBLIC SERVICE CORPORATION D/B/A

NORTHWESTERN ENERGY

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By:

/s/ Andrew S. Pollock_

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NPSC Received 10/01/2024

CERTIFICATE OF SERVICE

The undersigned certifies that an original of the above *Motion* for NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy were filed with the Public Service Commission on October 1, 2024, and a copy was served via electronic mail, on the following:

Public Service Commission psc.naturalgas@nebraska.gov

Nichole Mulcahy Public Service Commission nichole.mulcahy@nebraska.gov

Chris Dibbern Public Advocate dibberlaw@gmail.com

> /s/ Andrew S. Pollock Andrew S. Pollock

30583.072/4878-3277-3584, v. 1





October 1, 2024

Mr. Thomas Golden Executive Director Nebraska Public Service Commission 1200 N Street, Suite 300 Lincoln, NE 68508

RE: Docket NG115.1– In the Matter of the Commission, to conduct a management review of gas supply schedules implemented by NorthWestern Energy Public Service Corporation dba NorthWestern Energy, Sioux Falls, South Dakota, pursuant to Neb. Rev. Stat. 66-1854.

Dear Mr. Golden,

In preparation for the scheduled October 22, 2024 hearing in the above referenced matter, NorthWestern Energy Public Service ("NorthWestern"), dba NorthWestern Energy, hereby submits the following statement regarding the Management Review Audit of our natural gas supply management procedures submitted by the Bates White LLC consulting firm to the Nebraska Public Service Commission ("NPSC" or "Commission") on August 28, 2024.

NorthWestern was provided a Draft copy of Bates White's audit report on August 14, 2024 as per the NPSC's procedural schedule in this matter. We reviewed the draft report and submitted minor clarification comments to Bates White on August 26th. On August 28th, Bates White filed its final report with the Commission pursuant to the procedural schedule. NorthWestern reviewed the final report and is satisfied with the final findings and recommendations as presented by Bates White. We have no further comments for the Commission's consideration.

NorthWestern extends its appreciation to the Bates White consultants for their professionalism in how they conducted their audit of our natural gas supply procurement processes. The audit process was well organized and thoughtful. We look forward to participating in the October 22nd Commission hearing to consider the Bates White's audit report.

Sincerely,

Pamela A. Bonrud

Director-Government and Regulatory Affairs

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Cc: Nichole Mulcahy, Director Natural Gas, Pipeline and Transmission Line Department, NPSC Chris Dibbern, Nebraska Public Advocate

ATTACHMENT A