

**BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION**

IN THE MATTER OF THE	)	
COMMISSION, ON ITS OWN	)	
MOTION, SEEKING TO	)	Application No. NG-113/PI-241
INVESTIGATE WHETHER	)	
JURISDICTIONAL UTILITIES	)	PETITION FOR FORMAL
SHOULD ADD A TARIFF	)	INTERVENTION
PROVISION ADDRESSING	)	(Nebraska Public Advocate)
CUSTOMER REQUESTS FOR	)	
VOLUNTARY REMOVAL OR	)	
RELOCATION OF NATURAL GAS	)	
FACILITIES.	)	

Pursuant to Neb. Admin. Code Title 291, Chapter 1, § 002.12, the Nebraska Public Advocate hereby petitions the Nebraska Public Service Commission to allow him to formally intervene and become a party for all purposes in the above-numbered docket styled “In the Matter of the Commission on its own motion, seeking to investigate whether jurisdictional utilities should add a tariff provision addressing customer requests for voluntary removal or relocation of natural gas facilities.” 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  
Nebraska Public Advocate  
2511 S 77<sup>th</sup> Place  
Lincoln, NE 68506  
(402) 304-5019  
[Williamaustin1949@gmail.com](mailto:Williamaustin1949@gmail.com)

2. The interest of intervener is predicated upon his statutory duties as Nebraska 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 Nebraska 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 need of the Nebraska Public Advocate to be informed of prospective changes to rates, charges, and practices of jurisdictional utilities, as falling within the statutory responsibilities of the Nebraska Public Advocate and so establish the need for the Nebraska Public Advocate to participate fully in these proceedings. This statutory duty cannot be performed 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.

DATED this 1<sup>st</sup> day of June, 2022.

NEBRASKA PUBLIC ADVOCATE

By: 

William F. Austin, #10140  
2511 S 77<sup>th</sup> Place  
Lincoln, Nebraska 68506  
(402) 304-5019  
[Williamaustin1949@gmail.com](mailto:Williamaustin1949@gmail.com)

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of Public Advocate's "Petition for Formal Intervention" was served electronically on this 1st day of June, 2022, upon the following:

Thomas Golden Executive Director  
Nebraska Public Service Commission  
[thomas.golden@nebraska.gov](mailto:thomas.golden@nebraska.gov)

Jonathan Smith, Nichole Mulcahy, Deena Ackerman, Sallie Dietrich, Dillion Keiffer-Johnson  
Nebraska Public Service Commission  
[PSCNaturalGas@nebraska.gov](mailto:PSCNaturalGas@nebraska.gov)

Douglas J. Law  
Black Hills Energy  
[douglas.law@blackhillscorp.com](mailto:douglas.law@blackhillscorp.com)

Robert J. Amdor  
Black Hills Energy  
[robert.amdor@blackhillscorp.com](mailto:robert.amdor@blackhillscorp.com)

David Dlouhy  
Black Hills Energy  
[David.Dlouhy@blackhillscorp.com](mailto:David.Dlouhy@blackhillscorp.com)

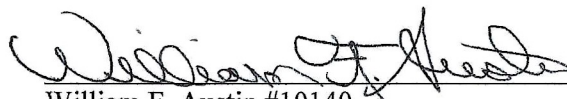
Giao Nguyen  
Black Hills Energy  
[Giao.Nguyen@blackhillscorp.com](mailto:Giao.Nguyen@blackhillscorp.com)

Jeff Thomas  
Black Hills Energy  
[Jeff.Thomas@blackhillscorp.com](mailto:Jeff.Thomas@blackhillscorp.com)

Pam Bonrud  
NorthWestern Energy  
[Pam.Bonrud@northwestern.com](mailto:Pam.Bonrud@northwestern.com)

Jeffrey Decker  
NorthWestern Energy  
[Jeffrey.Decker@northwestern.com](mailto:Jeffrey.Decker@northwestern.com)

Andrew S. Pollock  
Heartland Natural Gas, LLC  
[apollock@remboltlawfirm.com](mailto:apollock@remboltlawfirm.com)

  
William F. Austin #10140