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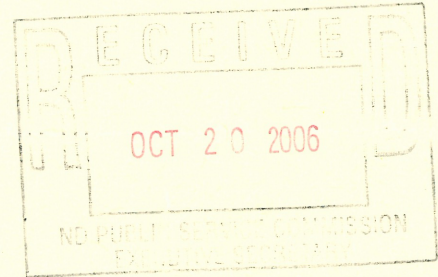
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October 19, 2006

ILLONA JEFFCOAT-SACCO
ND PUBLIC SERVICE COMMISSION
600 E BOULEVARD AVE
BISMARCK ND 58505-0480



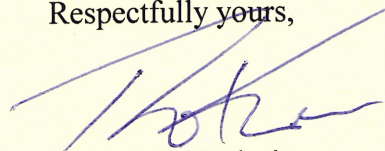
RE: Case No. PU-06-290
NDPSC
Federal Energy Policy Act Standards Investigation
Petition to Intervene and Written Comments by Imation Corp.
Our File No. 11906

Dear Ms. Jeffcoat-Sacco:

Enclosed for filing in the above-entitled matter is an Affidavit of Service by Mail of the Petition to Intervene which was served on Montana-Dakota Utilities.

Thank you for your attention to this matter. Please feel free to call me if you have any questions.

Respectfully yours,



Thomas D. Kelsch

TDK:dr

Enclosures

cc: Imation Corp.
Donald Ball, MDU
Daniel Kuntz, MDU



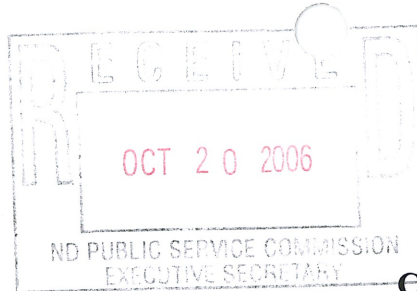
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Pages: 5

Affidavit of Service of Petition to Intervene
served on MDU
by Imation Corp. by Thomas D Kelsch, Atty.
10/20/2006 C: Comm Legal Illona, Jerry, Annette . .

STATE OF NORTH DAKOTA
PUBLIC SERVICE COMMISSION

Public Service Commission
Federal 2005 Energy Policy Act Standards
Investigation



Case No. PU-06-290

AFFIDAVIT OF SERVICE BY MAIL

IMATION CORP.
INTERVENER

STATE OF NORTH DAKOTA)
) ss.
COUNTY OF MORTON)

DEBRA ROEHRICH, being first duly sworn, on oath, deposes and says: That she is a citizen of the United States, over the age of eighteen and not a party to the above-entitled action.

That on the 19th day of October, 2006, this affiant deposited in the United States Post Office at Mandan, North Dakota, a true and correct copy of the following document(s) in the above captioned action:

- 1. Petition to Intervene.

That a copy of the above document(s) was securely enclosed in an envelope with postage duly prepaid, and addressed as follows:

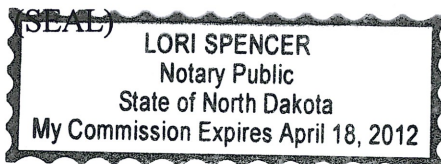
DONALD R BALL
VICE PRESIDENT - REGULATORY
AFFAIRS
MONTANA-DAKOTA UTILITIES CO
400 NORTH FOURTH STREET
BISMARCK ND 58501

DANIEL S KUNTZ
ASSISTANT GENERAL COUNSEL
MDU RESOURCES GROUP INC
PO BOX 5650
BISMARCK ND 58506-5650

DEBRA ROEHRICH

Subscribed and sworn to before me this 19 day of October, 2006.

Notary Public, State of North Dakota



COPY

STATE OF NORTH DAKOTA
PUBLIC SERVICE COMMISSION

Public Service Commission
Federal 2005 Energy Policy Act Standards
Investigation

Case No. PU-06-290

PETITION TO INTERVENE

IMATION CORP.
INTERVENER

COMES NOW Imation Corp. (Imation) by and through its attorney, Thomas D. Kelsch of Kelsch Kelsch Ruff & Kranda, hereby petition the North Dakota Public Service Commission (NDPSC) for permission to intervene in the above-entitled action.

On July 26, 2006, NDPSC ordered an investigation to consider whether to propose rules to adopt any and all of the new PURPA Standards paragraphs and sections 1251, 1252, or 1254 of the Act. A workshop has been scheduled to begin on October 23, 2006. The issues to be considered at the workshop are:

1. Whether the Commission should adopt any or all of the standards, under sections 1251, 152, or 1254 of the Act;
2. Whether the Commission should adopt different or modified standards from those described in sections 1251, 152, or 1254 of the Act; and
3. What compensation, if any, should be made available to consumers under PURPA section 122 for their reasonable expenses incurred in participating or intervening in this proceeding.

GROUND FOR INTERVENTION

Imation is a U.S. based company with more than 50 years experience in removable data storage. Imation has a manufacturing plant in Wahpeton, North Dakota. Ottertail Power Company (OTP) is the electrical power supplier to Imation's Wahpeton plant. Imation is currently OTP's 7th largest customer. Imation pays significantly higher electric rates than other large industrial customers in the area.

Imation as a large retail consumer of electricity in this state has a substantial interest in the Commission adopting time differentiated rates for retail customers, which is contemplated in this proceeding.

Intervention by Imation will not substantially broaden the issues or cause any delay in the proceedings.

POSITION AND INTEREST IMATION

Imation requests NDPSC adopt time differentiated rates that are:

- a). Based on its average embedded cost and reflect the utility's differences in cost between daytime and nighttime hours, and
- b). Appropriately reward high load factor customers such as Imation.

CONTRIBUTIONS OF IMATION AS AN INTERVENER

As an INTERVENER, Imation can help the NDPSC understand both the need and the urgency for the adoption of various time of use rate schedules from the standpoint of a large retail consumer. As an INTERVENER, Imation will be in a position to provide information and

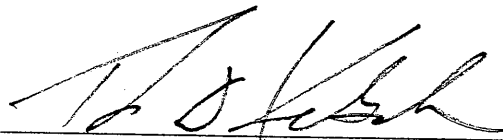
resources to the NDPSC, and be of general assistance to the NDPSC in the debate on how the proposed rules are written, the substance of the rules, and when they will be put into effect.

Imation is particularly interested in commenting on Section 1252 that focuses on utilities being required to offer variations time of use rate schedules to retail customers.

Imation's detailed comments are attached to this petition and filed with the NDPSC.

These comments document the need of time-differentiated rates, the rationale for such rates and the importance of adopting these rates as quickly as possible and outside of any overall rate case.

Imation Corp.
By its attorney,



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