

PETITION FOR INTERVENTION BY
MISSOURI VALLEY RESOURCE COUNCIL
BEFORE THE STATE OF NORTH DAKOTA PUBLIC SERVICE COMMISSION

In the Matter of
Application and Notice of Change
In General Electric Rates: PU-10-124
MONTANA-DAKOTA UTILITIES COMPANY
PETITION FOR INTERVENTION BY
MISSOURI VALLEY RESOURCE COUNCIL

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OCT 21 2010

PUBLIC SERVICE COMMISSION

I. IDENTIFICATION OF PETITIONER

Missouri Valley Resource Council is a citizen's organization comprised of residents and landowners in Burleigh and Morton County. The organization and its members have an interest in the Montana Dakota Utilities rate increase as supporters of energy efficiency and renewable energy. Members of Missouri Valley Resource Council are Montana Dakota Utilities ratepayers and have an interest in how their utility Montana Dakota Utilities will operate in the future.

II. INTERESTS OF THE PROPOSED INTERVENOR

Missouri Valley Resource Council and its members have an interest in developing more renewable energy projects in the Missouri Valley region because of the environmental advantages. In addition, Missouri Valley Resource Council has an interest in improving energy efficiency in the region due to the lack of programs promoting energy efficiency statewide. Missouri Valley Resource Council has held meetings informing the public about energy efficiency. These meetings highlighted the lack of energy efficiency throughout North Dakota.

III. IMPAIRMENT OF INTEREST

The current Montana Dakota Utilities rate increase application does not include any provisions for adding new renewable generation to the Montana Dakota Utility energy portfolio. The North Dakota legislature passed a Recycled and Renewable Energy Objective in 2007 of 10 percent by 2015, and it is Missouri Valley Resource Council's position that Montana Dakota Utilities must add more renewable energy in this rate increase to meet the objective by 2015. In addition, the rate increase application also does not include the addition of any energy efficiency programs for ratepayers. Currently the only energy efficiency programs offered by Montana Dakota Utilities in North Dakota are programs enacted by The American Recovery and Reinvestment Act of 2009. Montana Dakota Utilities does offer energy efficiency in other states that it serves such as South Dakota and Montana, and it is Missouri Valley Resource Council's position that this is not fair to the Montana Dakota Utilities ratepayers of North Dakota.

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IV. INTERVENTION BY MVRC WILL NOT
CREATE DELAY OR PREJUDICE

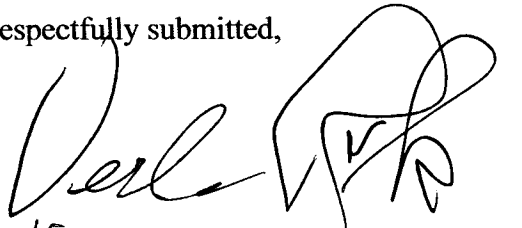
Missouri Valley Resource Council's intervention is timely and will not cause any delay in these proceedings or prejudice the rights of the existing parties. Missouri Valley Resource Council will coordinate its involvement with other intervenors.

V. CONCLUSION

For the foregoing reasons, the Public Service Commission should grant the request by Missouri Valley Resource Council to intervene with regard to the issues of lack of renewable energy and energy efficiency in the Montana Dakota Utilities rate increase request.

Dated 19th of October, 2010.

Respectfully submitted,



VERLE REINICKE, CHAIR