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May 26, 2015

Darrell Nitschke, Executive Secretary
North Dakota Public Service Commission
State Capitol Building
600 E. Boulevard Avenue
Bismarck, ND 58505-0480

Re: Application and Notice of Change in Natural Gas Rates--**Case No. PU-15-090**
Montana-Dakota Utilities Co. Natural Gas Rate Case

Secretary Nitschke:

Attached are an original and seven copies of two filings submitted on behalf of AARP, a **Petition to Intervene** and a **Motion for Admission Pro Hac Vice** to allow John B. Coffman to practice before the Commission in the above referenced matter.

As required by Rule 3 of the North Dakota Rules of Practice and Procedure, a copy of the enclosed Motion for Admission Pro Hac Vice, Mr. Coffman's affidavit, and a check in the amount of \$380 is being sent to the North Dakota State Board of Law Examiners under separate cover.

Please feel free to contact me with any questions or concerns.

Sincerely,

Dave A. Tschider

Enclosures

**STATE OF NORTH DAKOTA
PUBLIC SERVICE COMMISSION**

Montana-Dakota Utilities Co., a Division of)	
MDU Resources Group, Inc.)	Case No. PU-I5-90
Natural Gas Service Rate Increase Application)	

PETITION TO INTERVENE OF AARP

Comes Now AARP¹, pursuant to Commission Rules of Practice and Procedure 69-02-01-05, 69-02-01-06, and 69-02-01-07, respectfully petitions for intervention as an intervenor party in the above-captioned matter. In support of this petition, AARP states as follows:

1. AARP is a nonprofit, nonpartisan organization that advocates for people who are 50 years of age and older, seeking to promote their independence, choice and control in ways that are beneficial and affordable to them and to society as a whole. AARP promotes the well-being of older persons through advocacy, education, and service on a number of priority issues. AARP has determined that advocacy for reasonable utility rates and service for seniors is one of its priority issues. AARP has over 84,000 members in North Dakota, many of whom are residential natural gas customers of the Applicant Montana-Dakota Utilities Company ("MDU").

2. AARP's interest in this matter and its grounds for intervention relate to the substantial increase in natural gas rates proposed by MDU for the residential customer class. AARP desires to advocate on behalf of residential gas customers to ensure that

¹In 1999, the "American Association of Retired Persons" changed its name to simply "AARP", in recognition of the fact that people do not have to be retired to become members.

their rates are no higher than a level that is just and reasonable. More specifically, AARP is interesting in participating with regard to MDU's proposal for a five-year plan that guarantee it a profit margin and in an asymmetrical manner.

AARP also plans to advocate for a lower monthly customer charge. In the previous MDU rate case last year, the Commission just increased the fixed customer charge to \$15 per month, and now MDU is back this year, asking to increase it to \$21 per month (a 40% increase). Many older consumers use less than the average amount of natural gas.

These MDU proposals would directly and adversely impact those customers who are aged 50 and over. People aged 50 and over are more vulnerable to increases in energy prices. Generally, these consumers also devote a higher percentage of their total spending than do other age groups towards residential energy costs. Many older consumers also have special needs and safety concerns with regard to their access to natural gas service.

3. AARP believes that its intervention and participation in this proceeding would serve the public interest. AARP's intervention would not unduly delay the proceedings nor would it prejudice the rights of other parties.

4. A Motion For Admission Pro Hac Vice of John B. Coffman is being filed simultaneously at the North Dakota Public Service Commission and with the North Dakota Board of Law Examiners. Mr. Coffman has over 25 years of experience as a utility rate expert and attorney. He routinely appears and participates in matters before other state public utility commissions, including rate case appearances in Missouri, Illinois, Georgia, Alabama, New Jersey, and Minnesota. Service of any document or orders in this matter should be addressed to:

John B. Coffman
John B. Coffman, LLC
871 Tuxedo Blvd.
St. Louis, MO 63119-2044
Ph: (573) 424-6779
E-mail: john@johncoffman.net

WHEREFORE, AARP respectfully requests that the Commission grant its Petition to Intervene, entitling it to fully participate in this proceeding.

Respectfully submitted this 26th day of May, 2015.

TSCHIDER and SMITH



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CERTIFICATE OF SERVICE

I hereby certify that the original and seven (7) copies of the foregoing, along with the Motion for Admission Pro Hac Vice with Affidavit of John B. Coffman, was hand delivered to the Secretary of the North Dakota Public Service Commission, with a complete copy thereof mailed to **Daniel S. Kuntz**, MDU Resources Group, PO Box 5650, Bismarck, ND 58502-5650, on this 26th day of May, 2015.



David A. Tschider