

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Alliance Pipeline L.P.

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)

Docket No. RP15-1022-000

**NORTH DAKOTA PUBLIC SERVICE COMMISSION
MOTION TO INTERVENE OUT OF TIME**

Pursuant to Rule 212 and 214 of the Federal Energy Regulatory Commission's ("the Commission") Rules of Practice and Procedure, 18 C.F.R. §§ 385.212 and 385.214, the North Dakota Public Service Commission ("NDPSC") files this Motion to Intervene Out of Time in the captioned proceedings, as its interests may appear. In support of this motion, the NDPSC states as follows:

I.

The NDPSC is a constitutional agency of the State of North Dakota granted jurisdiction and authority to investigate and take action necessary to protect citizens, industries, and interests of the state. As stated in Proposed Revisions to FERC Gas Tariff filed by Alliance Pipeline L.P. ("Alliance") on 29 May 2015, Alliance is an open-access interstate natural gas pipeline that extends across North Dakota, with two additional receipt points within the state, from an interconnection with Alliance Pipeline Limited Partnership ("Alliance Canada") at the U.S. Canadian border in North Dakota. Within the State of North Dakota, there are industries, customers and potential business that may suffer significant impacts due to the Alliance tariff filing. As a public representative of retail customers and state interests of North Dakota, the NDPSC has a vital and direct interest in how the Alliance Tariff operates.

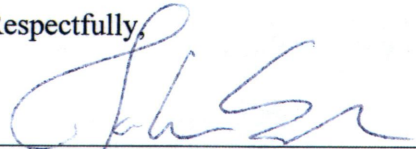
II.

The NDPSC just recently became aware of the Alliance tariff filing and its potential impact on the citizens and businesses of North Dakota. Shortly after becoming aware of and reviewing the proceedings, the NDPSC initiated procedures to ensure compliance with the state laws and rules required for an intervention. No additional burdens, prejudices, or disruptions of the proceedings should result from permitting the intervention.

III.

The NDPSC asks the Commission to accept its Motion to Intervene Out of Time because the NDPSC's participation in this proceeding is in the public interest, and the State's interests cannot adequately be represented by any other party in this proceeding. For the foregoing reasons, the NDPSC requests that it be granted intervention as a party in the above-captioned docket.

Respectfully,



John M. Schuh
Special Assistant Attorney General
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Bismarck, ND 58505-0480
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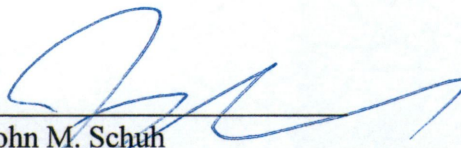
*Attorney for the North Dakota Public Service
Commission*

Dated: December 10, 2015

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the foregoing document to be served upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Bismarck, North Dakota this 18th day of December, 2015.



John M. Schuh
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Hamre, John G.

From: Schuh, John M.
Sent: Friday, December 18, 2015 9:54 AM
To: Hamre, John G.
Subject: FW: FERC Receipt of Filing in RP15-1022-000

-----Original Message-----

From: eFiling@ferc.gov [mailto:eFiling@ferc.gov]
Sent: Friday, December 18, 2015 9:49 AM
To: Schuh, John M.; efilingacceptance@ferc.gov
Subject: FERC Receipt of Filing in RP15-1022-000

Confirmation of Receipt

This is to confirm receipt by the FERC Office of the Secretary of the following electronic submission:

-Submission ID: 631847
-Docket(s) No.: RP15-1022-000
-Filed By: North Dakota Public Service Commission -Signed By: John Schuh -Filing Desc: Motion to Intervene Out-of-Time of North Dakota Public Service Commission under RP15-1022-000.
-Submission Date/Time: 12/18/2015 10:47:42 AM -Filed Date: 12/18/2015 10:47:42 AM

Additional detail about your filing is available via the following link:

<https://ferconline.ferc.gov/SubmissionStatus.aspx?hashcode=bUlij73oSlsfRMPdZxAxhw>

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Hamre, John G.

From: Schuh, John M.
Sent: Friday, December 18, 2015 10:36 AM
To: Hamre, John G.
Subject: FW: FERC Acceptance for Filing in RP15-1022-000

-----Original Message-----

From: efiling@ferc.gov [<mailto:efiling@ferc.gov>]
Sent: Friday, December 18, 2015 10:20 AM
To: Schuh, John M.; efilingacceptance@ferc.gov
Subject: FERC Acceptance for Filing in RP15-1022-000

Acceptance for Filing

The FERC Office of the Secretary has accepted the following electronic submission for filing (Acceptance for filing does not constitute approval of any application or self-certifying notice):

-Accession No.: 201512185089
-Docket(s) No.: RP15-1022-000
-Filed By: North Dakota Public Service Commission -Signed By: John Schuh -Filing Type: Motion to Intervene Out of Time
-Filing Desc: Motion to Intervene Out-of-Time of North Dakota Public Service Commission under RP15-1022.
-Submission Date/Time: 12/18/2015 10:47:42 AM -Filed Date: 12/18/2015 10:47:42 AM

Your submission is now part of the record for the above Docket(s) and available in FERC's eLibrary system at:

http://elibrary.ferc.gov/idmws/file_list.asp?accession_num=20151218-5089

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