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October 17, 2017

Darrell Nitschke Executive Secretary  
North Dakota Public Service Commission  
600 E. Blvd. Ave. Dept. 408  
Bismarck, ND 58505-0480

Re: Montana-Dakota Utilities Co., Case No. PU-17-295

Attached are an original and seven copies of two filings submitted on behalf of AARP namely; a **Petition to Intervene** as well as 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,

TSCHIDER and SMITH

A handwritten signature in blue ink, appearing to read "David A. Tschider".

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47 PU-17-295 Filed: 10/19/2017 Pages: 5  
Petition to Intervene of AARP

AARP

David A. Tschider, Tschider & Smith

**STATE OF NORTH DAKOTA  
PUBLIC SERVICE COMMISSION**

<b>Montana-Dakota Utilities Co., a Division of</b>	)	
<b>MDU Resources Group, Inc.</b>	)	<b>Case No. PU-I7-295</b>
<b>2017 Natural Gas Rate Increase Application</b>	)	

**PETITION TO INTERVENE OF AARP**

Comes Now AARP<sup>1</sup>, 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, with its nearly 38 million members in all 50 States and the District of Columbia, Puerto Rico, and U.S. Virgin Islands, is a nonpartisan, nonprofit, nationwide organization that helps people turn their goals and dreams into real possibilities, strengthens communities and fights for the issues that matter most to families such as healthcare, employment and income security, retirement planning, affordable utilities and protection from financial abuse. AARP has over 84,000 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. MDU is yet again proposing to increase the natural gas rates for households by a

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<sup>1</sup>In 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.

higher percentage than it is proposing to increase the rates to other customer classes, an average increase to residential natural gas customers of approximately 5.9%. AARP desires to advocate on behalf of residential natural gas customers in this case to ensure that their rates overall are no higher than a level that is just and reasonable, and to further ensure that residential customers do not pay more than their fair share compared to larger customer classes.

Moreover, MDU is proposing to increase the fixed charge for residential households to the extremely high rate of \$22.58; only a few years ago, this fixed charge was about \$9.00, which is closer to the industry average. AARP also plans to advocate for lower fixed monthly charges than is being proposed by MDU for residential households. Many older energy consumers use less than the average amount of energy and work hard to conserve their energy usage, and no amount of conservation or energy efficiency can reduce a fixed charge on a residential energy bill.

The MDU proposals in this case would directly and adversely impact many 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 regarding 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 29 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, Florida, Alabama, New Jersey, Arizona, and Minnesota. Mr. Coffman was permitted to appear pro hac vice in a previous MDU natural gas rate case in North Dakota (Case No. PU-I5-90).

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](mailto: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 17<sup>th</sup> day of October, 2017.

TSCHIDER and SMITH



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Local Counsel for AARP

**CERTIFICATE OF SERVICE**

I hereby certify that the original and seven (7) copies of the foregoing, along with the Motion for Admission Pro Hoc 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 19<sup>th</sup> day of October, 2017.



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Joshua J. Askvig