



DEPARTMENT OF THE AIR FORCE  
HEADQUARTERS AIR FORCE LEGAL OPERATIONS AGENCY



BEFORE THE  
NORTH DAKOTA PUBLIC SERVICE COMMISSION

MONTANA-DAKOTA UTILITIES CO., A DIVISON )  
OF MDU RESOURCES GROUP, INC. )  
2017 NATURAL GAS RATE INCREASE APPLICATION )  
\_\_\_\_\_ )

Case No. PU-17-295

October 19, 2017

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

Secretary Nitchke:

Enclosed for filing on behalf of Federal Executive Agencies (“FEA”) is a Petition for Intervention.

Thank you for your assistance. If you should have any question about this filing, please do not hesitate to contact me.

Sincerely,

Attorneys for Federal Executive Agencies

By: \_\_\_\_\_

*Andrew J. Unsicker*  
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Enclosure:

cc: Petition to Intervene  
Counsel for Parties of Record (w/enc)

**BREAKING BARRIERS...SINCE 1947**

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been furnished  
by electronically and/or by or U.S. mail 19<sup>th</sup> day of October, 2017 to the following:

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**Case No. PU-17-295**

**PETITION FOR LEAVE TO INTERVENE**

Comes Now FEA (Federal Executive Agencies), pursuant to Commission Rules of Practice and Procedure 69-02-02-05, respectfully petitions for intervention as an intervenor party in the above-captioned matter. In support of this petition, FEA states and alleges as follows:

1. FEA consists of certain agencies of the United States Government which have offices, facilities, and/or installations in the service area of Montana-Dakota Utilities (MDU), which has filed a general rate case. Chief among the Federal customers served by MDU is Minot Air Force Base (AFB). Minot AFB is a major consumer of gas purchased from MDU and an increase in rates could affect the ability of Minot AFB to operate many of its loads to the fullest extent possible, and thereby affect the military mission of Minot AFB. The Department of Defense has been delegated authority by the General Services Administration to represent, through Department of the Air Force counsel, the consumer interest of the FEA in this proceeding under 40 U.S.C. 121(d) and 501(c) [these sections supersede 40 U.S.C 481(a)(4) and 486(d)].

2. FEA intends to address the reasonableness of MDU's class cost of service study, rate of return and proposed revenue requirement study. FEA continues to examine the public filings and preserves the right to be heard on additional issues that may arise in this matter. Gas costs represent one of the largest variable expenses of operating the Federal offices, facilities, and installations on whose behalf intervention is sought herein, and all will be significantly affected.

by an increase in rates. For the aforementioned reasons, we submit that FEA have a substantial interest in the proceedings in this Docket which no other party can adequately represent.

3. FEA believes that intervention and participation in this proceeding would serve the interests of Minot AFB and other federal agencies receiving service from MDU. FEA's intervention would not unduly delay the proceedings nor would it prejudice the rights of other parties.

4. All correspondence concerning this docket should be directed to the following:

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**WHEREFORE**, the FEA request that the Commission grant this Request to Intervene and that they be accorded full party status in this Docket.

Respectfully submitted this 19<sup>th</sup> day of October, 2017.

**Attorneys for Federal Executive Agencies**

By:  \_\_\_\_\_

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