

STATE OF NORTH DAKOTA
PUBLIC SERVICE COMMISSION

Montana-Dakota Utilities Co.
WBI Energy Expansion – Morton County
Public Convenience & Necessity

Case No. PU-24-385

PROTEST AND REQUEST FOR HEARING

Mor-Gran Sou Electric Cooperative, Inc., through counsel, hereby protests the application of Montana-Dakota Utilities Co. for Permanent Authority to extend electric service to the Glen Ullin Town Border Station WBI at a site located in the NW1/4 of the NW1/4 of Section 20, Township 139N, Range 88W, in Morton County, North Dakota, which application was filed on January 15, 2025. Mor-Gran-Sou Electric Cooperative, Inc., is interested in this proceeding because the service location is within its service territory. Mor-Gran-Sou Electric Cooperative, Inc., further requests the Public Service Commission to hold a hearing and authorize discovery in this matter pending a hearing. Mor-Gran-Sou Electric's reasons for requesting a hearing are outlined in the attached affidavit.

Dated this 12th day of February, 2025.




Andrew L. Fergel (ND Bar ID# 04871)
Attorney for Mor-Gran-Sou-Electric Coop, Inc.
1600 E. Interstate Ave., Suite 2
Bismarck, ND 58503
(701) 355-5855
afergel@iea.coop

8. Servicing the location with a direct underground feed from Mor-Gran-Sou Electric's nearby substation and existing transformers will likely provide greater reliability than servicing the location with MDU's 1.8 mile overhead feeder line out of the distribution substation in the City of Glen Ullin since the overhead feeder line may be exposed to wind, lightning, and ice storms.
9. Mor-Gran-Sou Electric is ready and able to service the location with a good amount of infrastructure that was in place preceding MDU's application

I swear, under penalty of perjury and the law of North Dakota, that the foregoing is true and correct to the best of my knowledge and belief.

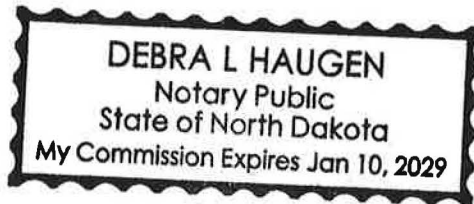
Date: February 12, 2025.


Gary Fitterer

Subscribed and sworn to before me this 12th day of February, 2025.


Signature of Notary
My Commission Expires: Jan 10, 2029

(S E A L)



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CERTIFICATE OF SERVICE BY CERTIFIED MAIL AND EMAIL

STATE OF NORTH DAKOTA)
 : ss
COUNTY OF BURLEIGH)

I, Andrew L. Fergel, do hereby certify that on February 12, 2025, I served the following document:

PROTEST AND REQUEST FOR HEARING WITH ATTACHED AFFIDAVIT

by sending a true and correct copy thereof through the United States Mail, at Bismarck, North Dakota by certified mail, return receipt requested, fully prepaid and addressed as follows:

Travis Jacobson
Vice President of Regulatory Affairs
Montana-Dakota Utilities Co.
400 North 4th Street
Bismarck, ND 58501

and by sending a true and correct copy thereof via email to:

Travis Jacobson
Montana-Dakota Utilities Co.
Travis.Jacobson@mdu.com

Jayden Veil
Montana-Dakota Utilities Co.
Jayden.Veil@mdu.com

Karl Olsen
Montana-Dakota Utilities Co.
Karl.Olsen@mdu.com.

Toby Gross
Montana-Dakota Utilities Co.
Toby.Gross@mdu.com

Jason Bentz
Co-General Manager
jbenstz@iea.coop

Travis Kupper
Co-General Manager
tkupper@iea.coop

North Dakota Public Service Commission
ndpsc@nd.gov
jschuh@nd.gov

ND Association of RECs
Zach Smith
zsmith@ndarec.com

To the best of my knowledge, information and belief, the above email addresses are the addresses of the parties intended to be served and that the above-described document was duly served.

Dated this 12th day of February, 2025.



Andrew L. Fergel (ND Bar ID# 04871)
Attorney for Mor-Gran-Sou-Electric Coop, Inc.
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