


Dakota Pipeline Safety Program Manager, Mary Zanter. The requirement outlined in Administrative Rule 20:10:37:18 is specific to Transmission facilities which NorthWestern was aware. However, given the unique attributes of the RNG projects, NorthWestern was unaware these requirements pertained to the three projects above for plastic pipe (Mill Valley and Full Circle) and pipeline connection (Brookings Receipt Station).

By 49 C.F.R. pt.192 definition, all three facilities are distribution. However, NorthWestern still has yet to determine how Northwestern will operate the pipeline when fully commissioned. As such, NorthWestern is constructing the three facilities noted above to the Federal Safety Standard in 49 C.F.R. pt.192 for Transmission specifications. The 49 C.F.R. pt.192 transmission construction specifications are more stringent than 49 C.F.R. pt.192 distribution construction requirements. By constructing to the more stringent standard in this initial phase, it provides NorthWestern additional flexibility in this realm of construction of RNG facilities.

Based on the foregoing as well as the information provided separately, NorthWestern requests a waiver of the requirement to provide the required information 60 days in advance of construction, relocation, and replacement.

Dated this 6th day of June, 2023.

NorthWestern Corporation d/b/a NorthWestern Energy

By: 
Pamela A. Bonrud
Director Government & Regulatory Affairs
NorthWestern Energy
3010 W. 69th Street
Sioux Falls, SD 57108