

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of Black Hills/)	Docket No. NG-0074.1
Nebraska Gas Utility Company,)	
LLC, d/b/a Black Hills Energy)	
Omaha, seeking approval of an)	
infrastructure system replacement)	
cost recovery charge, pursuant to)	
66-1865 and 66-1866 of the State)	
Natural Gas Regulation Act.)	

**RESPONSE OF BLACK HILLS/NEBRASKA GAS UTILITY COMPANY D/B/A BLACK
HILLS ENERGY TO PUBLIC ADVOCATE’S JUNE 3, 2015 REPORT**

June 15, 2015

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RESPONSE OF BLACK HILLS/NEBRASKA GAS UTILITY COMPANY D/B/A BLACK HILLS ENERGY TO PUBLIC ADVOCATE’S JUNE 3, 2015 REPORT AND TO COMMISSION INFORMATION REQUEST

I. INTRODUCTION

On April 6, 2015, Black Hills/Nebraska Gas Utility Company, LLC d/b/a Black Hills Energy (“Black Hills Energy”) filed with the Nebraska Public Service Commission (the “Commission”) an application, along with associated proposed rate schedules and documentation, requesting authority to establish an Infrastructure System Replacement Cost Recovery Charge to be labeled on customer’s bills as a Pipeline Replacement Charge (“PRC”). Black Hills Energy’s PRC application was filed pursuant to §§ 66-1865 and 66-1866 of the State Natural Gas Regulation Act (the “Act”).

This Black Hills Energy Response to the Public Advocate’s Report in this proceeding is submitted pursuant to the Commission’s April 14, 2015 Progression Schedule. In support of its Response, Black Hills Energy responds to the June 5, 2015 Notice of Report and Recommendations of the Public Advocate as follows:

II. PROCEDURAL BACKGROUND

1. Commission Public Notice

The Commission issued public Notice of Black Hills Energy's April 6, 2015 Pipeline Replacement Charge application in the *Daily Record* on April 8, 2015.

2. Progression Order

On April 14, 2015 the Commission issued a Notice of Assessment, Order Adopting Progression Schedule, and Setting Hearing.

3. Protective Order

On April 14, 2015, the Commission issued a Protective Order to protect confidential data provided by Black Hills Energy.

4. Interventions

On April 16, 2015, the Public Advocate filed a Petition for Formal Intervention. The Commission granted the Public Advocate's Petition to Intervene on April 28, 2015.

On May 27, 2015, the Commission entered an order approving the May 19th, 2015 Petition for Informal Intervention of SourceGas Distribution, LLC ("SourceGas").

5. Discovery

Subsequent to the filing of the PRC Application, the Public Advocate, as required by the Act, conducted an examination of information regarding Black Hills Energy's PRC application to confirm that (i) the underlying costs were in accordance with the Act and (ii) to confirm proper calculation of the proposed Infrastructure System Replacement Cost Recovery Charge rates and rate schedules. The Public Advocate submitted eight (8) different sets of informational

requests to Black Hills Energy, and Black Hills Energy fully responded to all information requests.¹

In response to the Public Advocate's various sets of data requests, Black Hills Energy discovered that data included within limited areas of its PRC application, which was relied upon to calculate the overall Pipeline Replacement Charge, should be supplemented or modified. For example, during the informational request process, it was discovered and then Black Hills Energy volunteered three (3) modifications to its PRC application. Those modifications and associated data responses are identified as follows:

1. The plant additions contained in the filed PRC application should be reduced by (\$64,075.70) to eliminate an included project, the GRETNA – Nebraska Crossing project, because it does not qualify for recovery under the current definition of “eligible infrastructure system replacements”.²
2. During the discovery process, the Public Advocate identified and Black Hills Energy confirmed that a calculation error in Schedule 3.4 Deprec-Reserv-ADIT was inadvertently made relating to the calculation of the 263(A) Unicap Adjustment for Tax on work order #60020093. The error resulted in an immaterial change in the ADIT calculation and produced an additional \$1,073 of jurisdictional revenue requirement.³
3. Black Hills Energy also identified that the Company incorrectly requested different customer charges for Commercial and Energy Option customers. In Docket No. NG-0074 the Commission approved a Stipulation between Black Hills Energy and the Public Advocate requiring Energy Option and Commercial rates under the PRC

¹ Black Hills Energy also provided copies of its data responses to the Commission staff.

² See Response Attachment 1 –Response BHE -7 from the PA Data Request Set 1.

³ See Response Attachment 2 - Response BHE-14 from the PA Data Request Set 2.

application to be equal. The equal rates are consistent with natural gas rates previously approved by the Commission for those classes of customers. Accordingly, Black Hills Energy prepared a corrected Schedule 6 (Monthly Customer Charge) to the filed Exhibit C of the Application, and will present that corrected schedule and corrected tariff to the Commission for approval as part of the application in this proceeding.⁴

III. REPORT AND RECOMMENDATION OF THE PUBLIC ADVOCATE

Pursuant to the “Hearing Officer Order Adopting Procedural Schedule and Setting Hearing” entered April 14, 2015, the Public Advocate’s Report was due to the Commission on or before June 5, 2015.

On June 5, 2015, the Public Advocate filed a “Notice of Filing of Report and Recommendation of the Public Advocate” (hereafter “Public Advocate’s Report” or “Report”) regarding Black Hills Energy’s PRC application. In summary, the Report concludes that:

(1) Black Hills Energy’s processes and controls are adequate and not unreasonable so as to not adversely affect the costs in the Infrastructure System Replacement Charge;⁵

(2) Black Hills Energy’s PRC application and supporting exhibits provide most of the specific project information required by Nebraska statute. However, the dates that construction began for each project were not provided in the initial application. The Public Advocate obtained the dates construction began through the discovery process. The Report recommends that Black Hill Energy verify in any future filing that all requested information is included;⁶

⁴ See Response Attachment 3 –Response BHE-26 from the PA Data Request Set 5.

⁵ Public Advocate’s Report at page 15.

⁶ Public Advocate’s Report at page 22.

(3) With the exception of the one (1) project Black Hills Energy will remove, the GRETNA – Nebraska Crossing project representing a net amount of \$64,075.70, all other sampled projects met the criterion for recovery under the Nebraska statute;⁷

(4) Black Hills Energy’s PRC application calculated the pretax revenue requirement using the methodology defined within the statute and mathematical checks uncovered nothing unreasonable;⁸

(5) The amount and timing of the surcharge request was within the limits established by Nebraska statute;⁹

(6) As filed, the Public Advocate’s Report recommends revising the level of the Pipeline Replacement Charge due to the removal of investment for the GRETNA – Nebraska Crossing project and the error found in work order 60020093 ADIT correction;¹⁰ and

(7) Black Hills Energy’s customer allocation is in compliance with the Commission order.¹¹

IV. BLACK HILLS ENERGY’S RESPONSE TO THE PUBLIC

ADVOCATE’S REPORT

Black Hills Energy concurs with, the conclusions and recommendations set forth in the Report. The professionalism and diligence applied by the Public Advocate and its consultant, Blue Ridge Consulting Services, in this proceeding should be commended.

1. General Comments

Black Hills Energy appreciates the communication, cooperation and understanding that the Public Advocate extended to Black Hills Energy in this proceeding.

⁷ Public Advocate’s Report at page 18.

⁸ Public Advocate’s Report at pages 36 – 42.

⁹ Public Advocate’s Report at page 41.

¹⁰ Public Advocate’s Report at page 41.

¹¹ Public Advocate’s Report at page 43.

As this was Black Hills Energy's second PRC application and another time Black Hills Energy has had an opportunity to work directly with the Public Advocate and with Blue Ridge Consulting Service, it is pleased with the overall process of the review.

The Public Advocate also provided a draft version of its Report in advance of the filing. Black Hills Energy had an opportunity to review items contained in the Report, and to communicate any material concerns that it may have with the Report's recommendations and calculations.

Black Hills Energy finds that the Public Advocate's Report is thorough and accurate in its findings and conclusions. The Report fairly represents the status of compliance with the recommendations set forth in the Public Advocate's 2013 PRC Report and as further approved in the Stipulation presented to the Commission. Black Hills Energy acknowledges that for the reasons set forth in its data responses and as noted in the Public Advocate's 2015 Report that it still has some process and policy items to consider and thereafter to complete before any future Pipeline Recovery Charge application (i.e., either past or pro forma) is submitted to the Commission.

To be clear, Black Hills Energy intends on reviewing its policies and practices in light of the Report's recommendations. Furthermore, as it implements new information systems and technology Black Hills Energy fully consider, and where appropriate, take further action on the recommendations contained in the Public Advocate's Reports. Black Hills Energy anticipates that future Black Hills Energy PRC application reviews by the Public Advocate and the Commission will be as efficient as this proceeding, which has been exemplary to date.

V. ENERGY OPTIONS TARIFF RATE STIPULATION AND CORRECTION

At the time of its filing, Black Hills Energy inadvertently applied different rates for its Commercial and Energy Option customers. This was an unfortunate mistake that Black Hills Energy readily agrees should be corrected. This item was settled in the rate case and again in the Pipeline Recovery Charge order previously issued in Docket No. NG – 0074.

Upon further review of this matter, and in recognition of the item pointed out by the Public Advocate, Black Hills Energy agrees that a rate design applying the increase in costs from the Pipeline Replacement Charge application equally to Commercial and Energy Options customers would also yield rates that are “just and reasonable.”

In other words, Black Hills Energy proposes a minor correction should be made to its original filing to adjust and to equalize the tariff rates proposed for Energy Option and Commercial customers related to the Pipeline Replacement Charge.

The Commission should approve the recommendation of the Public Advocate, as accepted by Black Hills Energy, that the Pipeline Replacement Charge increase and rate design for the Commercial and Energy Option customer class should be equal.

Black Hills Energy acknowledges a change from its proposed Pipeline Replacement Charge application to equalize Commercial and Energy Option Customers as consistent with the rate case methodology proposed by Black Hills Energy in Docket No. NG -0061, and with the Commission’s order on this matter in Docket No. NG- 0074.

The new tariff rates for the Pipeline Recover Charge would be as follows:

Description	Residential	Commercial	Energy Options -
			Firm
Monthly Charge Approved per Order Dated Nov. 25, 2013	\$ 0.50	\$ 1.48	\$ 1.48
Proposed Monthly Charge (Increase) - Application	\$ 0.50	\$ 1.95	\$ 1.95
Total Monthly Infrastructure System Replacement Recovery Charge	\$ 1.00	\$ 3.43	\$ 3.43

As the primary purpose of the Pipeline Replacement Charge mechanism is for infrastructure replacements, both customers are similarly situated.

Black Hills Energy supports approval of a change in the rates as part of this proceeding to the extent the Public Advocate and Commission believe such treatment is in the public interest, and in compliance with its orders and the Act.

1. Revised Pipeline Replacement Charge Tariffs

As shown on the chart provided above, Black Hills Energy is in support of equalized Commercial and Energy Option rate designs as part of a total collection of approximately \$1.5 million dollars of investment in infrastructure system replacements. To that end, Black Hills Energy provides tariffs reflecting equalization, both tracked and clean, as part of this Response.

Black Hills Energy’s Response Attachment 4 includes a revised set of tracked and clean tariffs applying an additional charge Pipeline Replacement Charge of \$.50 for Residential Customers, \$1.95 for Commercial Customers, and \$1.95 for Energy Option Customers. When added to the current Pipeline Replacement Charge approved in Docket No. NG-0074, the total Pipeline Replacement Charge to be added to the monthly Customer Charge of Black Hills Energy’s jurisdictional customers taking Residential, Commercial and Energy Options – Firm service, is \$1.00, \$3.43 and \$3.43, respectively.

For the reasons provided above, Black Hills Energy proposes that the Commission should approve the tariff that provides for equal treatment in rate of \$.50 for Residential Customers and \$1.95 per month for Commercial and Energy Option Customers.

VI. STIPULATION

Given the recommendations provided in the report, Black Hills Energy intends on working with the Public Advocate to reach a mutually agreeable Stipulation.

VII. BLACK HILLS ENERGY RECOMMENDATIONS

Black Hills Energy recommends to the Commission that an order be entered approving the attached Black Hills Energy, Nebraska Gas Tariff Revised Sheet No. 7.

The Infrastructure System Replacement Cost Recovery Charge, as authorized in such order, will be set forth separately from other Customer Charges and separately designated as “Pipeline Replacement Charge.”

Black Hills Energy recommends that the Commission enter the data responses of Black Hills Energy into the record.

Black Hills Energy recommends that the Commission approve the updates and modifications that have been included in the attachments to this response. Those revisions include, but are not limited to, the use of the depreciation rate identified herein, and provide the correct level of projects, costs, and other adjustments that result in a “just and reasonable” Pipeline Replacement Charge.

Black Hills Energy also recommends that the Commission consolidate the Commercial and Energy Option classes for the purpose of rate design of the Pipeline Replacement Charge.

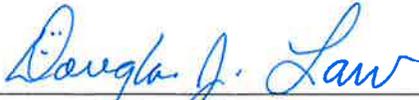
VIII. CONCLUSION

For the reasons stated above, Black Hills Energy respectfully requests that the Commission adopt the modifications to its Pipeline Replacement Charge application and to approve the tariffs included in this response.

Dated this 15th day of June, 2015.

Respectfully submitted,

**BLACK HILLS ENERGY, LLC d/b/a BLACK
HILLS ENERGY**

By: 

Douglas J. Law (#19436)

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing Response of Black Hills Energy LLC, Applicant, to the October 7, 2013 Notice and Recommendations of the Public Advocate in the above-captioned proceeding was served electronically on this 15th day of June, 2015, upon the following:

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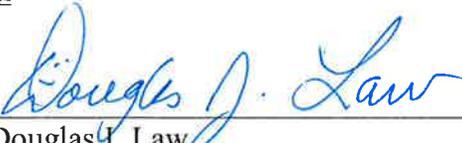
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Douglas J. Law

**BLACK HILLS ENERGY
DOCKET NO. NG-0074.1
Public Advocate's First Request for Information and Documents to Applicant**

Date of Request: April 14, 2015
Date Response Due: April 24, 2015
Date Responded: April 24, 2015
Respondent: Don Nordell

Request No. 7 – Work order Testing:

Please confirm that the attached (NEPA-BHE 2015 Project Sample List Attachment.xlsx) projects were replacements of existing infrastructure. If not, please explain why the project should be included in an infrastructure system replacement cost recovery mechanism.

Response:

After additional review of work order #60020495, a decision to remove this project from the Pipeline Replacement Charge filing would be necessary. This project would not qualify under the current definition of “eligible infrastructure system replacements”. Black Hills Energy hereby confirms to the best of its understanding, information and belief that all other projects in the project sample list were replacement of existing infrastructure.

Attachment(s):

None

**BLACK HILLS ENERGY
DOCKET NO. NG-0074.1
Public Advocate's Second Request for Information and Documents to Applicant**

Date of Request: April 21, 2015
Date Response Due: May 1, 2015
Date Responded:
Respondent: Jason Keil

Request No. 14 - ADIT:

Reference Exhibit C, Schedule 3.4 Depr-Reserv-ADIT, Line number 253, Project Number 60020093. Please explain why the 263(A) Unicap Adj for Tax (Column S) is hardcoded 0 which is inconsistent with other projects.

Response:

An error was made in the preparation of the schedule included in the application. The correct information is as follows; column S should be \$847.65 (column J x .0169), column T should be \$49,309.34, column V should be 0, and the percentage in column W should be .519. This would result in the Accumulated Depreciation in column X being \$25,579.22 and the net tax basis in column Y being \$23,730.12. These are the only columns that would have changes. The effect of this change produces an additional \$1,073 of jurisdictional revenue requirement. Due to the statutory cap on Residential customers and the smaller rate base allocation ratios to the Commercial and Energy Option – Firm customer classes, this change does not affect the proposed cost recovery monthly charge.

Attachment(s):

None

**BLACK HILLS ENERGY
DOCKET NO. NG-0074.1**

Public Advocate's Second Request for Information and Documents to Applicant

Date of Request: May 11, 2015
Date Response Due: May 21, 2015
Date Responded: May 18, 2015
Respondent: Jason Keil

Request No. 26 – Customer Allocation:

The Commission approved a monthly charge for both Commercial customer and Energy Option customers of \$1.48 per month in the last ISR [Case No. NG-0074, dated 11/25/13, page 5]. The Commission's Order approving the ISR stated:

“In its most recent general rate proceeding, the Energy Option and Commercial classes were treated as one class in the setting of volumetric and fixed rates. Therefore, Energy Option customer would expect to be treated similarly with regard to the current charge as they were treated in the most recent rate case. Should a change in the rate design with respect to the two classes be necessary, such a change should be done in a comprehensive rate case rather than in the application of this surcharge.”

The Company's application in this proceeding requests different customer charges for Commercial (\$1.87) and Energy Option Firm (\$2.31). Did the Company obtain authorization for the requested differential between Commercial and Energy Option Firm Pipeline Replacement Charge? If so, please provide.

Response:

The different customer charge for Energy Option and Commercial customers is an error. The Company will stipulate that the Energy Option and Commercial rates under this

filing should be equal, similar to the equal rates as previously approved by the Commission for those classes of customers.

As part of this response, the Company provides a corrected Schedule 6 (Monthly Customer Charge) to Exhibit C that allocates among classes of customers according to its most recent general rate proceeding. This rate change and concession is intended to apply to all reference to any class charges in filed Testimony, the Application, and all Tariff requests contained in the original filing.

The Company will prepare a corrected tariff sheets to reflect this error, and will stipulate that the rates should be equal in any formal Stipulation provided to the Commission in this docket.

The corrected Exhibit C – Schedule 6 is as follows:

**BLACK HILLS ENERGY
NEBRASKA GAS UTILITY COMPANY, LLC**

**Exhibit C
Schedule 6**

**Pipeline Replacement Charge
For the Period Ended January 31, 2015**

Page 1 of 1

COST RECOVERY CUSTOMER CHARGE CALCULATION - CORRECTED

<u>Line No.</u>		<u>RESIDENTIAL</u>	<u>COMMERCIAL</u>	<u>ENERGY OPTIONS - FIRM</u>	<u>ENERGY OPTIONS / COMMERCIAL COMBINED</u>	<u>TOTAL JURISDICTIONAL</u>
1	Approved Rate Base Docket No. NG-0061	121,605,114	28,766,321	10,667,459	39,433,780	161,038,894
2	Rate Base Ratio	75.5%	17.9%	6.6%	24.5%	100.0%
3	Average Number of Customer Docket No. NG-0061	176,386	14,886	4,459	19,345	195,731
4	Jurisdictional Revenue Deficiency (Exhibit C, Schedule 1, Line 8) Allocated to Customer Class based on Rate Base Ratio)	\$ 1,409,142			\$ 456,953	\$ 1,866,094
5	Calculated Cost Recovery Monthly Charge per Bill	\$ 0.67			\$ 1.97	
6	Proposed Cost Recovery Monthly Charge per Bill	\$ 0.50			\$ 1.97	
7	Proposed Cost Recovery Charge Revenues	\$ 1,058,316			\$ 456,953	\$ 1,515,269

Attachment(s):

Exhibit C -Pipeline Replacement Charge Calculation Schedules - Corrected 5 12 15.xlsx

NEBRASKA PUBLIC SERVICE COMMISSIONBLACK HILLS/NEBRASKA GAS UTILITY COMPANY, LLC d/b/a
BLACK HILLS ENERGY**Index No. 2**

Section: Index

Seventh Revised Sheet 1 of 2

Replacing: Sixth Revised Sheet 1 of 2

Dated: March 1, 2010

Nebraska Operations

Sheet 1 of 2

SUPERSEDED INDEX**NEW****REPLACES**

<u>Index</u>	<u>Section</u>	<u>Sheet</u>	<u>Description/Title</u>	<u>Index</u>	<u>Revision</u>	<u>Sheet</u>	<u>Effective Date</u>
2	Index	1 of 2	Superseded Index 5th Revised	2	Fourth Revised	1 of 2	March 1, 2010
3	Index	1 of 1	General Information Communities Served	3	Original	1 of 2	September 1, 2010
13	Index	1 of 2	Rate Schedule Index Fourth Revised	13	Fourth Revised	1 of 2	March 1, 2010
15	Index	1 of 2	Rate Schedule Energy Options Program	15	Third Revised	1 of 2	March 1, 2010
16	Index	1 of 2	Rate Schedule Economic Development Rate	16	Third Revised	1 of 2	March 1, 2010
21	Index	1 of 3	General Service Terms and Conditions	21	Original	1 of 3	March 1, 2010
23	Index	1 of 2	Billing and Payments	23	Third Revised	1 of 2	March 1, 2010
23	Index	2 of 2	Billing and Payments	23	Second Revised	2 of 2	March 1, 2010
26	Index	1 of 3	Emergency Curtailment Plan	26	Second Revised	1 of 3	March 1, 2010
1	Index	1 of 2	General Index Third revised	2	Second Revised	1 of 2	November 1, 2007
2	Index	1 of 2	Superseded Index Sixth Revised	2	Fifth Revised	1 of 2	March 1, 2010
17	RS	1 of 1	Rate Schedule Pipeline Replacement Charge First Revised	17	Original	1 of 1	June 1, 2005
17	RS	1 of 1	Rate Schedule Pipeline Replacement Charge Second Revised	17	First Revised	1 of 1	December 1, 2013

Date Issued: April 6, 2015
 Issued By: Steven M. Jurek
 Vice President, Regulatory Affairs

Effective Date: August 6, 2015

NEBRASKA PUBLIC SERVICE COMMISSION
 BLACK HILLS/NEBRASKA GAS UTILITY COMPANY, LLC d/b/a
 BLACK HILLS ENERGY

Index No. 17
 Section: RS
 Second Revised Sheet
 Replacing First Revised Sheet 1 of 1

Nebraska Operations	Sheet 1 of 1
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RATE SCHEDULE
PIPELINE REPLACEMENT CHARGE

The following monthly "Pipeline Replacement Charges" shall be applied to Residential, Commercial, and Energy Options Firm customers from the effective date of this tariff until the Company's next general rate case or until this tariff is updated and approved by the Nebraska Public Service Commission.

Pipeline Replacement Charge Authorized in NG-0074

Residential	\$0.50
Commercial	\$1.48
Energy Options – Firm	\$1.48

Pipeline Replacement Charge Authorized in NG-0074.1

Residential	\$0.50
Commercial	\$1.95
Energy Options – Firm	\$1.95

Total Pipeline Replacement Charge Authorized

Residential	\$1.00
Commercial	\$3.43
Energy Options – Firm	\$3.43

Date Issued: April 6, 2015
 Issued By: Steven M. Jurek
 Vice President, Regulatory Affairs

Effective Date: August 6, 2015

NEBRASKA PUBLIC SERVICE COMMISSION

BLACK HILLS/NEBRASKA GAS UTILITY COMPANY, LLC d/b/a
 BLACK HILLS ENERGY

Index No. 2

Section: Index

~~Sixth~~ Seventh Revised Sheet 1 of 2

Replacing: ~~Fifth~~ Sixth Revised Sheet 1 of 2

Dated: March 1, 2010

Nebraska Operations	Sheet 1 of 2
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SUPERSEDED INDEX

NEW

REPLACES

<u>Index</u>	<u>Section</u>	<u>Sheet</u>	<u>Description/Title</u>	<u>Index</u>	<u>Revision</u>	<u>Sheet</u>	<u>Effective Date</u>
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<u>17</u>	<u>RS</u>	<u>1 of 1</u>	<u>Rate Schedule Pipeline Replacement Charge Second Revised</u>	<u>17</u>	<u>First Revised</u>	<u>1 of 1</u>	<u>December 1, 2013</u>

Date Issued: ~~August 7, 2013~~ April 6, 2015
 Issued By: Steven M. Jurek
 Vice President, Regulatory Affairs

Effective Date: ~~December 1, 2013~~ August 6, 2015

NEBRASKA PUBLIC SERVICE COMMISSION
 BLACK HILLS/NEBRASKA GAS UTILITY COMPANY, LLC d/b/a
 BLACK HILLS ENERGY

Index No. 17
 Section: RS
~~First-Second~~ Revised Sheet
 Replacing ~~Original~~
 Effective June 1, 2005 ~~First Revised Sheet 1 of 1~~

Nebraska Operations

Sheet 1 of 1

**RATE SCHEDULE
 PIPELINE REPLACEMENT CHARGE**

The following monthly "Pipeline Replacement Charges" shall be applied to Residential, Commercial, and Energy Options Firm customers from the effective date of this tariff until the Company's next general rate case or until this tariff is updated and approved by the Nebraska Public Service Commission.

Pipeline Replacement Charge Authorized in NG-0074

Residential	\$0.50
Commercial	\$1.48
Energy Options – Firm	\$1.48

Pipeline Replacement Charge Authorized in NG-0074.1

Residential	\$0.50
Commercial	\$1.95
Energy Options – Firm	\$1.95

Total Pipeline Replacement Charge Authorized

Residential	\$1.00
Commercial	\$3.43
Energy Options – Firm	\$3.43

Date Issued: ~~August 7, 2013~~April 6, 2015

Effective Date: ~~December 1, 2013~~August 6, 2015

Issued By: Steven M. Jurek
Vice President, Regulatory Affairs