November 19, 2026

Ms. Leah Mohr
Executive Director
South Dakota Public Utilities Commission
500 E. Capitol Avenue
Pierre, SD 57501

Re: Docket EL26-031 – Application Supplement for the Energy Conversion Facility Permit Application for the Hub City Energy Park Project: Air Permit Application, Preferred Natural Gas Lateral Route and other Information

Dear Ms. Mohr,

NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy ("NorthWestern") notifies the South Dakota Public Utilities Commission ("Commission") of additional updates to the Application for an energy conversion facility construction permit for the Hub City Energy Park (the "Project") that was initially filed on October 2, 2026 (Reference 1). NorthWestern provided initial supplemental information on November 5, 2026 (Reference 2). Defined terms utilized herein, if not specifically defined, are the same as those defined in the Application.

Air Permit Application

As noted in the Application supplemental information provided on November 5, 2026 (Reference 2), the air permit construction application was received by the South Dakota Department of Agriculture and Natural Resources ("SD DANR") on October 22, 2026. The air permit construction application, as submitted to the SD DANR, is incorporated as *Appendix P – Air Permit Construction Application* to the Application and is included as Attachment 1 to this notice. The air permit construction application accounts for up to seven (7) combustion turbine ("CT") units at the Project Site. As noted in Section 25 of the Application, NorthWestern is not requesting approval for future modification or expansion of the Project in the Application. However, the air permitting process is structured to allow NorthWestern to retain flexibility if additional CT units beyond the initial three (3) units are desired to be added in the future.

Natural Gas Transmission Pipeline (Lateral) Route

NorthWestern has identified a preferred natural gas transmission pipeline/lateral route connecting the Project Site to the nearby Northern Border Pipeline ("NBPL") mainline. The preferred natural gas lateral route and preferred NBPL tap site location are shown in the maps in Attachments 2 and 3 to this notice. The map in Attachment 2 supersedes Application *Exhibit 01.2 – Site Location Map (5-mile)* and the map in Attachment 3 supersedes Application *Exhibit 03.2 – Surrounding Features Map (5-mile)*.

NorthWestern considered multiple routes in determining the preferred natural gas lateral route. The preferred natural gas lateral route was identified considering anticipated

environmental attributes, quantity of impacted parcels/landowners and installation costs. The preferred and alternate routes considered are shown in the maps included in Attachment 4 to this notice (*Exhibit 16.1 – Preferred and Alternate Natural Gas Lateral Routes Site Location Map (5-mile)* and *Exhibit 16.2 – Preferred and Alternate Natural Gas Lateral Routes Surrounding Features Map (5-mile)* are incorporated into the Application).

NorthWestern is planning to complete environmental studies and pursue easements associated with the preferred natural gas lateral route in 2026. Additionally, NorthWestern has submitted an interconnection request to NBPL for the tap site, with specific configuration and location yet to be determined. Subject to additional study work and development progress, the preferred natural gas lateral route is detailed in Attachment 5 to this notice (*Exhibit 17 – Preferred Natural Gas Lateral Route Detailed Map* is incorporated into the Application). Additionally, Attachment 6 includes the GIS shapefiles for the preferred natural gas lateral route corresponding to the detailed route map in Attachment 5. The GIS shapefiles included in Attachment 6 supplement the shapefiles originally included in Application *Appendix O – Transmission Line Shapefiles*.

At this time, barring any unforeseen results from the necessary studies, etc., the preferred route is anticipated to be the route for the natural gas lateral in this matter. The Application will be updated as additional information becomes available.

Stakeholder Correspondence and Agency Consultations

Consistent with Application *Section 3 – Stakeholder Engagement*, NorthWestern has continued to engage in correspondence and consultations with applicable agencies, entities and tribes. Please see additional correspondence in Attachment 7 to this notice, which provides updates and is a supplement to Application *Appendix B – Stakeholder and Agency Consultations*. The additions to Application *Appendix B* are shown in redline in Attachment 7 and should be incorporated into NorthWestern's Application.

Application *Section 3* provides that NorthWestern intends to hold a second public open house before the end of 2026. With the Commission public input meeting scheduled for November 23, 2026, NorthWestern plans to postpone the second public open house until early 2027 to consider feedback from the public input meeting to be held on November 23, 2026. Additional details regarding the second public open house will be provided when available.

Permitting Updates

This notice includes permitting updates for the Project Site (generation site) and the preferred natural gas lateral route.

For the Project Site, the United States Army Corps of Engineers ("USACE") provided a jurisdictional determination ("JD") for the wetlands identified during the field delineation, noting that all wetlands were non-jurisdictional at the federal level and, as such, any impacts to the delineated wetlands would require coordination with the SD DANR. As noted in the Application, NorthWestern will avoid impacts to wetlands at the Project Site to the extent possible. Please see the USACE JD letter in Attachment 7 to this notice. Additionally, for the Project Site, regarding sensitive habitat and species, clearance has been received by the South

Dakota Game, Fish, & Parks ("SD GFP") and concurrence of findings has been provided by the United States Fish and Wildlife Services ("USFWS"). With NorthWestern following SD GFP and USFWS guidance, impacts to sensitive habitat are not anticipated and further agency consultation is not required. Please see SD GFP and USFWS correspondence in Attachment 7 to this notice.

As mentioned, permitting activities, including field surveys, are advancing for the preferred natural gas lateral route.

Continued Project Updates

Please let me know if any questions related to the information contained in this Application supplement. NorthWestern will continue to provide updates as they become available.

Sincerely,



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Attachments

Attachment 1	Application Appendix P – Air Permit Construction Application
Attachment 2	Application Exhibit 01.2 – Site Location Map (5-mile) (revised with preferred natural gas lateral route)
Attachment 3	Application Exhibit 03.2 – Surrounding Features Map (5-mile) (revised with preferred natural gas lateral route)
Attachment 4	Application Exhibit 16.1 – Preferred and Alternate Natural Gas Lateral Routes Site Location Map (5-mile)
	Application Exhibit 16.2 – Preferred and Alternate Natural Gas Lateral Routes Surrounding Features Map (5-mile)
Attachment 5	Application Exhibit 17 – Preferred Natural Gas Lateral Route Detailed Map
Attachment 6	Application Appendix O – Transmission Line Shapefiles
Attachment 7	Application Appendix B – Stakeholder and Agency Consultations (revised)

References

Reference 1	Docket EL26-031 – In the Matter of NorthWestern Energy Public Service Corporation, dba NorthWestern Energy, for an Energy Conversion Facility Permit to Construct the Hub City Energy Park Natural Gas Generation Facility, Including a Natural Gas Transmission Pipeline, Near Aberdeen, South Dakota https://puc.sd.gov/Dockets/Electric/2026/EL26-031.aspx
Reference 2	Docket EL26-031 – Updated estimated construction cost for the proposed Hub City Energy Park generation project (*initial supplement*) https://puc.sd.gov/commission/dockets/electric/2026/EL26-031/LTR110526.pdf