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August 23, 2023

Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street NE, Room 1A  
Washington, D.C. 20426

Re: WBI Energy Transmission, Inc.  
Wahpeton Expansion Project  
Docket No. CP22-466-000

Dear Ms. Bose:

On May 27, 2022, WBI Energy Transmission, Inc. (WBI Energy) filed an application with the Federal Energy Regulatory Commission (FERC or Commission) requesting a Certificate of Public Convenience and Necessity (Certificate) under section 7(c) of the Natural Gas Act to construct, modify, operate, and maintain natural gas transmission facilities in Cass and Richland Counties, North Dakota for its Wahpeton Expansion Project (Project). Prior to filing for a Certificate, WBI Energy participated in the Commission's National Environmental Policy Act pre-filing review process for the Project in Docket No. PF21-4-000. There were no protests to WBI Energy's Certificate application filed. Several letters in support of the Project were submitted on the docket.

The purpose of the Project is to provide incremental firm transportation service from WBI Energy's existing interconnect with Viking Gas Transmission Company near Felton, Minnesota, to two new delivery locations near Kindred and Wahpeton, North Dakota. New pipeline infrastructure in southeast North Dakota is vital in meeting a growing demand for natural gas in that region. Montana-Dakota Utilities Co. (Montana-Dakota), a local distribution company, has contracted with WBI Energy to receive firm natural gas transportation service to provide additional firm uninterrupted natural gas service to the community of Wahpeton and to extend natural gas service to the community of Kindred for the first time to meet the residential, commercial, and industrial needs of that community. In addition, and importantly, the Project will enhance natural gas supply and reliability for existing and new customers in Wahpeton, Kindred, and agricultural customers along the pipeline route by providing a firm, uninterrupted source of natural gas. The Project will also allow customers access to other natural gas producing basins via WBI Energy's existing pipeline system.

The Project is supported by a binding Precedent Agreement with Montana-Dakota for 20,000 equivalent dekatherms (equiv. dkt) per day of incremental firm natural gas transportation service for a ten-year term. Montana-Dakota has secured firm contracts with industrial and commercial customers in Wahpeton that require approximately 10,000 equiv. dkt per day of firm natural gas service. Montana-Dakota will utilize the remaining 10,000 equiv. dkt per day for firm residential and commercial natural gas service in the community of Wahpeton, to extend natural gas service to the

community of Kindred and possibly other communities along the pipeline route once the facilities are in place.

WBI Energy requested authorization for the Project by July 1, 2023. For the forgoing reasons, and due to the seasonal construction windows experienced in the Upper Midwest, WBI Energy respectfully requests that the Commission issue an order in this certificate proceeding no later than September 21, 2023, to meet an in-service date of November 1, 2024, and provide the benefits described above.

Respectfully Submitted,

/s/ Rob L. Johnson

Rob L. Johnson  
President  
WBI Energy, Inc.

Courtesy Copies:

The Honorable Chairman Willie Phillips, FERC  
The Honorable Commissioner James Danly, FERC  
The Honorable Commissioner Allison Clements, FERC  
The Honorable Commissioner Mark C. Christie, FERC