NorthWestern Energy Group, Inc.

EIN: 93-2020320

Attachment to Form 8937

Report of Organizational Actions Affecting Basis of Securities

The information contained herein is being provided pursuant to the requirements of Section 6045B of the Internal Revenue Code of 1986, as amended (the "Code"). This attachment includes a general summary regarding certain U.S. federal income tax laws and regulations relating to the effects on the tax basis of shares of common stock of Bright Horizon Energy Corporation ("Bright Horizon Energy"), formerly known as Black Hills Corporation ("Black Hills"), received by former shareholders of NorthWestern Energy Group, Inc. ("NorthWestern") as a result of the merger of River Merger Sub Inc., a wholly owned subsidiary of Black Hills, with and into NorthWestern on November 13, 2026 (the "Merger").

The discussion is intended to assist shareholders in understanding the organizational action and its effect on the tax basis of the stock received in the transaction. It does not constitute tax advice, and shareholders should consult their tax advisor regarding any potential tax consequences of the Merger, including the applicability and effect of all U.S. federal, state and local, and foreign tax laws.

Line 14. Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action.

On November 13, 2026, River Merger Sub Inc., a wholly owned subsidiary of Black Hills, merged with and into NorthWestern pursuant to the Agreement and Plan of Merger by and among Black Hills, NorthWestern, and River Merger Sub Inc., dated as of August 18, 2025 (the "Merger Agreement"). NorthWestern survived as a direct wholly owned subsidiary of Black Hills (now Bright Horizon Energy). At that time, each share of NorthWestern common stock was automatically exchanged for 0.98 shares of Bright Horizon Energy common stock and, if applicable, cash in lieu of fractional shares, without interest.

Line 15. Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis.

The Merger is intended to qualify as a "reorganization" within the meaning of Section 368(a) of the Code. Accordingly, U.S. holders who exchanged their shares of NorthWestern common stock for shares of Bright Horizon Energy common stock in the Merger generally will not recognize any gain or loss for U.S. federal income tax

purposes, except with respect to cash, if any, received in lieu of fractional shares of Bright Horizon Energy common stock.

Each NorthWestern shareholder's aggregate tax basis in the shares of Bright Horizon Energy common stock received in the Merger (including any fractional share of Bright Horizon Energy common stock for which cash was received) will equal such NorthWestern shareholder's aggregate adjusted tax basis in the shares of NorthWestern common stock surrendered in the Merger, subject to adjustments relating to any fractional share for which cash was received. If a NorthWestern shareholder held different blocks of NorthWestern common stock (generally, NorthWestern common stock acquired on different dates or at different prices) at the time the Merger became effective, such shareholder should consult their tax advisor with respect to the determination of the tax bases of the particular shares of Bright Horizon Energy common stock received in the Merger.

Each NorthWestern shareholder who received cash in lieu of a fractional share of Bright Horizon Energy common stock generally will recognize capital gain or loss measured by the difference between the cash received for such fractional share and the portion of the shareholder's tax basis in the shares of NorthWestern common stock allocable to the fractional shares, determined as described above.

Line 16. Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates.

The aggregate adjusted tax basis of all Bright Horizon Energy shares received equals the total adjusted basis of the NorthWestern shares surrendered in the exchange. This basis is not increased or decreased by the exchange of stock itself, except for any adjustments related to fractional shares.

Line 17. List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based.

Sections 368(a), 354, 356, and 358.

Line 18. Can any resulting loss be recognized?

Except with respect to any cash received in exchange for fractional shares, generally no loss will be recognized by NorthWestern shareholders on the exchange of NorthWestern common stock for Bright Horizon Energy common stock as a result of the Merger.

Line 19. Additional Information

The transaction was effective on November 13, 2026. Therefore, the tax effects of the Merger should be reported by former NorthWestern shareholders in the tax year that

includes such date (e.g., a calendar-year shareholder would reflect them on their 2026 return).