

DEPARTMENT OF PUBLIC SERVICE REGULATION
BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MONTANA

IN THE MATTER Of Northwestern Energy's)	
Application for Approval Electric Supply)	UTILITY DIVISION
Deferred Cost Account Balance and Projected)	DOCKET NO. D2008.5.45
Electric Supply Cost)	
)	
IN THE MATTER Of Northwestern Energy's)	
Application for Approval Electric Supply)	UTILITY DIVISION
Deferred Cost Account Balance and Projected)	DOCKET NO. D2009.5.62
Electric Supply Cost)	
)	

DATA REQUESTS OF THE MONTANA CONSUMER COUNSEL

MCC-001 RE: 2007/2008 Default Supply Tracking Period.
Witness: Frank V. Bennett

Please provide an electronic working copy of Exhibit__(FVB-1) 07-08, with all links intact, including all workpapers.

MCC-002 RE: 2007/2008 Transmission Costs.
Witness: Frank V. Bennett

Please provide all documents supporting the transmission cost of \$5,566,212 for the 2007/2008 default supply tracking period.

MCC-003 RE: 2007/2008 QF Tier II Contracts.
Witness: Frank V. Bennett

Please provide a detailed explanation of what "QF Tier II Stipulation" and "QF Tier II Stipulation Adjustment" refer to, as shown for the months of June 2008 on Page 4 of Exhibit__(FVB-1) 07-08. Also, please provide all documentation supporting the amounts.

MCC-004 RE: 2007/2008 Fixed Price Transactions.
Witness: Frank V. Bennett

Please provide all supporting documents for the net fixed price purchase requirement of 907,600 MWhs during the 2007/2008 default supply tracking period, indicating quantity and price for each sale and purchase.

MCC-005 RE: 2007/2008 Market Transactions.
Witness: Frank V. Bennett

Please provide all supporting documents for the net market purchase requirement of 815,638 MWhs during the 2007/2008 default supply tracking period, indicating quantity and price for each sale and purchase.

MCC-006 RE: 2007/2008 Basin Creek.
Witness: Frank V. Bennett

Please provide a detailed explanation of why Basin Creek production was so low in the months of March and May 2008.

MCC-007 RE: 2007/2008 Administrative Expense.
Witness: Frank V. Bennett

- a) Please provide all documents supporting the \$3,007,149 in administration. Please itemize each cost (e.g., outside legal services, scheduling, software, broker, consultants, etc.).
- b) Please explain in detail what is included in the Resource Administration cost, and why this cost varies so much from month to month (e.g., in December 07 is \$181,955, while in May 08 is \$-480).

MCC-008 RE: 2007/2008 DSM Lost T&D Revenue.
Witness: Frank V. Bennett

Please provide all documents, in electronic format, supporting the calculations for the \$1,548,835 total cost of DSM Lost T&D revenues for the tracker period 2007/2008, as shown in the table on page 4 of Exhibit__(FVB-1) 07-08. Also, please explain and reconcile in detail how this total relates to the 6-month DSM Lost Revenue for January-June 2008 (\$323,302) shown on Exhibit_(WMT-3), page 1 of 13 attached to the testimony of Mr. William M. Thomas.

MCC-009 RE: 2008/2009 Default Supply Tracking Period.
Witness: Frank V. Bennett

Please provide an electronic copy, with all links intact, of Exhibit__(FVB-2) 08-09, including all workpapers.

MCC-010 RE: 2008/2009 Transmission Costs.
Witness: Frank V. Bennett

Please provide all documents supporting the transmission cost of \$7,434,972 for the 2008/2009 default supply tracking period.

MCC-011 RE: 2008/2009 Fixed Price Transactions.
Witness: Frank V. Bennett

Please provide all supporting documents for the net fixed price purchase requirement of 1,069,625 MWhs during the 2008/2009 default supply tracking period, indicating quantity and price for each sale and purchase.

MCC-012 RE: 2008/2009 Market Transactions.
Witness: Frank V. Bennett

Please provide all supporting documents for the net market purchase requirement of 808,675 MWhs during the 2008/2009 default supply tracking period, indicating quantity and price for each sale and purchase.

MCC-013 RE: 2008/2009 Administrative Expense.
Witness: Frank V. Bennett

- a) Please provide all documents supporting the \$2,477,302 in administration. Please itemize each cost (e.g., outside legal services, scheduling, software, broker, consultants, etc.).
- b) Since the outside consultant for real-time scheduling was replaced with in-house real-time scheduling in December 2008, as stated in your testimony on page FVB-13, please identify the line item and the scheduling cost paid in Administrative Expenses that included the outside consultant; and the estimated cost of that line item in Administrative Expenses for December 2008 to June 2009 if the consultant had not been replaced by the in-house service.
- c) Please explain in detail the estimated amounts for Resource Administration for the months of May and June 2009, and why there was a zero actual cost for the previous 10 months in the 2008/2009 tracker period.

MCC-014 RE: 2008/2009 DSM Lost T&D Revenue.
Witness: Frank V. Bennett

Please provide all documents, in electronic format, supporting the calculations of the \$495,831 actual total cost of DSM Lost T&D revenues for the 10 months in the tracker period 2008/2009, as shown on the table on page FVB-14.

MCC-015 RE: 2009/2010 Default Supply Tracking Period.
Witness: Frank V. Bennett

Please provide an electronic copy, with all links intact, of Exhibit__(FVB-3) 09-10, including all workpapers.

MCC-016 RE: 2009/2010 Transmission Costs.
Witness: Frank V. Bennett

Please provide all documents supporting the forecasted transmission cost of \$6,381,627 for the 2008/2009 default supply tracking period.

MCC-017 RE: FVB-15 lines 1-4
Witness: Frank V. Bennett

Please fully explain why CU4 variable cost revenues of \$12,620,304 are subtracted from revenues (i.e., treated as an expense) in computing the CU4 over collection.

MCC-018 RE: Exhibit (FVB-1).07-08
Witness: Frank V. Bennett

Please tie/reconcile the data for each month in Exhibit (FVB-1) to the respective monthly electric default supply tracker filings.

MCC-019 RE: Exhibit (FVB-2).08-09
Witness: Frank V. Bennett

Please tie/reconcile the data for each month in Exhibit (FVB-2) to the respective monthly electric default supply tracker filings.

MCC-020 RE: Exhibit (FVB-2).08-09 pg. 4
Witness: Frank V. Bennett

Please provide the invoices that comprise the total supply expense figures for November 2008 and December 2008 (columns G & H) in Exhibit (FVB-2).08-09 pg. 4.

MCC-021 RE: Puget revenue credits
Witness: Frank V. Bennett

Please provide a detailed explanation of the Puget revenue credits and provide the supporting work papers that show the calculation of the (\$20,260,952) Puget revenue credits figure shown in the table at the top of page FVB-15.

MCC-022 RE: Deferred Supply Rates.
Witness: Cheryl A. Hansen

In your testimony at page CAH-7 & CAH-8, you state that the load allocation between residential and residential employee, as well as the load allocation for GS-1 Secondary and GS-1 Primary to secondary and primary non-demand metered and demand metered are done using a ratio based on actual historical usage. Please provide the data and calculations used to determine these allocations.

MCC-023 RE: Deferred Supply Rates.
Witness: Cheryl A. Hansen

Please provide an electronic working copy, with all links intact, of Exhibit__(CAH-3).08-09, including all workpapers.

MCC-024 RE: CU4 Fixed Cost of Service Rate.
Witness: Cheryl A. Hansen

Please provide an electronic working copy, with all links intact, of Exhibit__(CAH-4).09-10, including all workpapers.

MCC-025 RE: CU4 Fixed Cost of Service Rate.
Witness: Cheryl A. Hansen

In your testimony on page CAH-14, you state that in contrast to the derivation of the market-based supply rate, which uses your forecasted loads for 2009-2010, derivation of the CU4 fixed cost of service rate uses loads from the 12-month forecasted period January 1, 2007 through December 31, 2007.

- a) Please explain in more detail why it is necessary to use 2007 test year loads to determine CU4 rates in this filing.
- b) What would proposed rates be if the CU4 fixed cost of service rates were derived using forecasted loads for 2009-2010?
- c) If the forecasted loads for 2009-2010 are 5,879,364 MWhs, would you expect rates for this period, which were derived using the 5,741,321 MWhs loads from the 2007 test period, to recover more than the approved revenue requirement. Please explain your answer.

MCC-026 RE: Exhibit (CAH-2).09-10
Witness: Cheryl A. Hansen

As referenced on pages 1 and 2 of exhibit CAH-2 please provide detailed explanations and work papers showing the specific revisions made to the Jul07-Jun08 deferred electric supply cost account balance in compliance with Docket No. D2007.5.46 Order No. 6836c.

MCC-027 RE: Electric Supply DSM Program Spending & Budget.
Witness: William M. Thomas

In reference to Exhibit__(WMT-2), page 1, please provide supporting documents and explain in detail why the estimated spending for Jul-09 thru Jan-10 for “General Expenses related to all DSM Programs” is much greater than in the other months (Feb-10 thru June-10).

MCC-028 RE: Electric Supply DSM Program Spending & Budget.
Witness: William M. Thomas

In reference to Exhibit__(WMT-2), page 1, please provide supporting documents and explain in detail why the spending in Commercial Business Partners Program is higher for actual Jul’08 and estimated Oct’09 and lower for actual Feb’09 and estimated Nov’09 than the average for the other months.

MCC-029 RE: Electric Supply DSM Program Spending & Budget.
Witness: William M. Thomas

In reference to Exhibit__(WMT-2), page 1, please provide supporting documents and explain in detail why the actual and estimated monthly spending in 2007-08 and 2008-09 tracker year for Market Transformation (NEEA) seem not to be uniform; in other words,

there are months with no spending or as little as \$25 (Aug-08), and months with estimated spending as high as \$350,000 (Mar-10 & June-10).

MCC-030 RE: DSM Program Status Report.
Witness: William M. Thomas

On page WMT-12 of your testimony, you mentioned that Northwestern now markets the E+ New Homes as a combined electric and natural gas DSM effort. Is the cost of supporting this program shared by the electric and gas customers, or is it all charged to electric customers? If it is shared, what proportion and amount of the cost goes to electric and gas customers. Please explain your answer in detail.

MCC-031 RE: Electric DSM Lost Revenues.
Witness: William M. Thomas

Please provide an electronic working copy, with all links intact, of Exhibit__(WMT-3), including all workpapers.

MCC-032 RE: CU-4 Related DSM Lost Revenues.
Witness: William M. Thomas

Please explain how the target and reported annual average MW have been calculated for January to June 2009 and for Tracker period 2009-2010 for DSM Lost Revenues – Colstrip Unit 4, as shown on page 10 of Exhibit__WMT-3.

MCC-033 RE: Electric DSM Lost Revenues for the 2008-09 Tracker Year.
Witness: William M. Thomas

Please reconcile Northwestern proposed recovery of \$1,606,190 for Electric DSM Lost Revenues for the 2008-09 Tracker Year with the amount included for cost recovery in the Prefiled Direct Testimony of Mr. Frank Bennett, as you stated on page WMT-30, lines 15 to 19 of your testimony.

MCC-034 RE: Colstrip 4 Operations.
Witness: Kevin Markovich

In reference to page KJM-5, lines 4 to 9 of your testimony:

- a) Please provide a complete list of all times, since CU4 was put into rate base, when market prices for power have fallen below the variable cost for CU4, showing for each such occasion, the variable cost of CU4 and the market price of power.

- b) Please provide a complete list, by hour, of the market price of power since CU4 was put into rate base

MCC-035 RE: Colstrip 4 Operations, page KJM-5, lines 16-21.
Witness: Kevin Markovich/Frank V. Bennett

On July 22, 2009 Portland General Electric issued “earnings guidance” stating that CU4 would be out of service until mid-November

- a) Please provide a complete explanation detailing the reason why the outage estimate lengthened from March-July to March-November.
- b) Please provide a modified Exhibit__(FVB-3) showing the projected cost impact of this extended outage (this part of the question is also directed to Mr. Bennett).

MCC-036 RE: Real Time (Hourly) Scheduling.
Witness: Kevin Markovich

Please quantify the dollar amount of extra cost or savings that bringing the real time scheduling in house has on the tracker on an annual basis, compared to the alternative of outsourcing this function.

MCC-037 RE: Fixed-For-Float Swaps
Witness: Kevin Markovich

For all natural gas “swaps” or “fixed-for-float” transactions entered into by NWE with counter parties from November 2005 through the present, please provide a listing showing for each month the following:

- a) Amount paid each month by NWE to counter parties to the transactions.
- b) Amount paid each month to NWE by counter parties to the transactions.
- c) Net amount paid by or paid to NWE by counter parties to the transactions.

MCC-038 RE: Fixed-For-Float Swaps
Witness: Kevin Markovich

For each month from November 2005 through the present, please provide a listing showing for each month the following:

- a) NWE’s total Dt of commodity natural gas purchases.

- b) NWE's total commodity cost of purchased gas, including the net amount paid by or paid to NWE by counter parties to natural gas swaps or fixed-for-float swaps transactions.
- c) NWE's total commodity cost of purchased gas, excluding the net amount paid by or paid to NWE by counter parties to natural gas swaps or fixed-for-float swaps transactions.

MCC-039 RE: Fixed-For-Float Swaps
Witness: Kevin Markovich

At page KJM-11, lines 16-17, Mr. Markovich states that NWE's natural gas swaps transactions have "reduced the impacts of market price volatility on NWE's natural gas supply rates."

- a) Please define the meaning of the phrase "market price volatility," as used in the referenced testimony.
- b) Please provide copies of all documents prepared by or for NWE since November of 2005 that relate in any way to the effect(s) of NWE's use of natural gas swaps transactions on the impacts of market price volatility on the Company's natural gas supply rates.
- c) Please provide copies of all documents that support the referenced testimony.

MCC-040 RE: Fixed-For-Float Swaps
Witness: Kevin Markovich

At page KJM-11, line 18, Mr. Markovich states that NWE's natural gas swaps transactions have "helped reduce administrative tasks."

- a) Please provide copies of all documents that support the referenced testimony.
- b) Please provide a calculation or quantification, with supporting workpapers, of the actual cost savings that NWE realized from reductions in administrative tasks resulting from the Company's natural gas swaps transactions.

MCC-041 RE: Fixed-For-Float Swaps
Witness: Kevin Markovich

At page KJM-11, line 19, Mr. Markovich states that NWE's natural gas swaps transactions have "helped manage credit issues much more efficiently."

- a) Please provide copies of all documents that support the referenced testimony.
- b) Please describe each type of "credit issue" that has been affected by NWE's natural gas swaps transactions.
- c) Please provide a calculation or quantification, with supporting workpapers, of the actual cost savings that NWE realized because it was able to manage credit issues more efficiently as a result of its natural gas swaps transactions.