

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

* * * * *

IN THE MATTER OF NORTHWESTERN) UTILITY DIVISION
ENERGY, Annual Application for Approval of)
Unreflected Gas Cost Account Balance, Projected) DOCKET NO. D2009.5.63
Gas Cost and Gas Transportation Adjustment)

**MONTANA CONSUMER COUNSEL'S
DATA REQUESTS
TO
NORTHWESTERN ENERGY**

MCC-01 RE: Marginal Commodity Cost
Witness: J.M. Smith

Please state NWE's marginal commodity cost of gas supply in each month during the period January 2008 through the present.

MCC-02 RE: Gas Procurement Plan
Witness: J.M. Smith

Please provide copies of all documents prepared by or for NWE since January 1, 2008 relating in any way to NWE's natural gas procurement plans practices, policies and/or strategies.

MCC-03 RE: Gas Price Hedging
Witness: J.M. Smith

Please provide copies of all documents prepared by or for NWE since January 1, 2008 relating in any way to the actual or potential use by NWE of gas price hedging strategies, including both physical and financial derivatives strategies, as hedges against gas supply price volatility.

MCC-04 RE: Gas Price Forecasts
Witness: J.M. Smith

Please provide copies of all documents prepared by or for NWE since January 1, 2008 relating in any way to forecasts, projections or estimates of:

- a. Future market prices of gas supplies on the NWE system.
- b. NWE's future gas cost tracker rate or rates.

MCC-05 RE: Exhibits
Witnesses: J.M. Smith, P.J. DiFronzo, and W. M. Thomas

Please provide on computer diskette or CD, in Microsoft Excel format, with all formulas and links intact, the spreadsheet data used to produce each exhibit attached to NWE's filing in this docket.

MCC-06 RE: Exhibits
Witnesses: J.M. Smith, P.J. DiFronzo, and W. M. Thomas

Please provide on computer diskette or CD, in Microsoft Excel format, with all formulas and links intact, all workpaper-type input spreadsheet data used to produce each exhibit attached to NWE's filing in this docket, including an identification of individual suppliers, purchase quantities, costs, and prices, for individual contracts and or supply sources.

MCC-07 RE: Gas Supply Contracts
Witness: J.M. Smith

Please provide copies of the gas purchase contracts for each of NWE's eight largest gas supply sources, based on actual quantities purchased during the period July 2008 - June 2009

MCC-08

RE: Fixed Price Hedges
Witness: J.M. Smith

For each fixed-for-float/swaps or similar transaction or contract entered into or in effect at any time on or after July 2008, please provide the following:

- a. Copies of each contract and any related contract documents.
- b. Copies of all documents relating in any way to the reason(s) why NWE entered into the subject transaction.
- c. Copies of all documents containing estimates or calculations of the expected impact of the subject transaction on NWE's total and/or average cost of purchased gas.
- d. Copies of all documents relating to the reason(s) for each transaction.

MCC-09

RE: Gas Storage
Witness: J.M. Smith

Please provide NWE's end of the month working gas in storage quantity for each month during the period April 2008 through the present, for each of the following categories of working gas in storage:

- a. Storage gas owned by NWE.
- b. Deferred storage gas owned by others but committed to NWE.
- c. Any other storage gas committed to or available to NWE.
- d. Total storage gas owned by, committed to or available to NWE.

MCC-10

RE: Gas Storage
Witness: J.M. Smith

Please provide NWE's net injections/withdrawals of working gas in storage for each month during the period April 2008 through the present, for each of the following categories of working gas in storage:

- a. Storage gas owned by NWE.
- b. Deferred storage gas owned by others but committed to NWE.
- c. Any other storage gas committed to or available to NWE.
- d. Total storage gas owned by, committed to or available to NWE.

MCC-11

RE: Gas Storage
Witness: J.M. Smith

Please provide the total working gas storage capacity available for use by NWE, whether or not the capacity was being used by NWE, for each gas storage field available to NWE, as of the end of each month during the period April 2008 through the present.

MCC-12

RE: Gas Storage
Witness: J.M. Smith

Please provide copies of all documents prepared by or for NWE at any time since January 1, 2008, relating in any way to the quantities of working gas the Company would inject into, withdraw from, leave in, or otherwise maintain for future use in gas storage fields owned by or available to NWE.

MCC-13 RE: Gas Procurement Plan
Witness: J.M. Smith

Please provide copies of all documents prepared by or for NWE at any time since January 1, 2008, relating in any way to NWE's actual or potential plans, strategies, and/or policies relating to any of the following:

- a. Gas supply price volatility.
- b. Gas supply cost hedging.
- c. Gas supply prices in NWE's various gas supply market areas.
- d. The actual or potential impact on gas supply costs of alternative actual or potential gas supply cost hedging tools.

MCC-14 RE: Gas Procurement Plan
Witness: J.M. Smith

Please provide copies of all documents prepared by or for NWE at any time since January of 2008, relating in any way to how other regulated natural gas utilities in the U.S. have dealt with gas supply price volatility.

MCC-15 RE: Gas Procurement Plan
Witness: J.M. Smith

Please provide copies of all documents in NWE's possession prepared by others that address, describe, or discuss gas utility gas supply procurement plans, strategies, hedging activities, policies and/or practices.

MCC-16 RE: Updated Exhibit ____ (JMS-1)
Witness: J.M. Smith

Please provide an updated version of Exhibit ____ (JMS-1) that includes actuals for May 2009 and June 2009.

MCC-17 RE: As Filed and Updated Exhibit ____ (JMS-1)
Witness: J.M. Smith

Please provide on computer diskette in Excel format:

- a. A version of as-filed Exhibit ____ (JMS-1) Workpapers that contain quantity and expenses data for each individual supply source associated with the various broad categories listed in the exhibit, e.g., “Nova Capacity,” “Canada Pipeline,” etc.
- b. A version of the Updated Exhibit ____ (JMS-1) Workpapers requested in MCC-16 that contains quantity and expenses data for each individual supply source associated with the various broad categories listed in the exhibit, e.g., “Nova Capacity,” “Canada Pipeline,” etc.
- c. The prices used to calculate the expenses associated with each individual supply source within the broad categories referred to in a. and b. above.

MCC-18 RE: Storage Optimization
Witness: J.M. Smith

With respect to the testimony at JMS-6, Line 18, through JMS-7, Line – 17, please provide:

- a. Copies of all documents prepared by or for NWE relating in any way to the referenced transaction(s).
- b. Copies of all contracts relating to the referenced transaction(s).

MCC-19 RE: Storage Optimization
Witness: J.M. Smith

With respect to the testimony at JMS-6, Line 18, through JMS-7, Line – 17, please provide for each purchase and sale discussed there:

- a. The quantities of gas and related costs and prices allocated to each sale.
- b. A description of the source or sources of NWE gas supply allocated to each sale.
- c. The quantities of gas and related revenues and sales prices for each sale.

MCC-20

RE: Storage Optimization
Witness: J.M. Smith

With respect to the testimony at JMS-7, Lines 1- 17, please provide the workpapers and calculations relating to the following:

- a. The “Gross Spread” amount of \$1.00/Dkt.
- b. The “transportation and carrying cost” amount of \$0.5459/Dkt. In this response please show separately how the transportation cost and carrying cost amounts were calculated.
- c. The “net spread” and “total benefit” amounts of \$0.4541/Dkt and \$408,722.

MCC-21

RE: March to May Spread
Witness: J.M. Smith

With respect to the testimony at JMS-7, Line 19, through JMS-8, Line – 7, please provide the workpapers showing how the “1.1 million dollars” amount shown there was calculated.

MCC-22

RE: 12-Months Ended June 30, 2009
Witness: J.M. Smith

With respect to the testimony at JMS-4, Line 9, through JMS-5, Line – 12, please provide the following for the actual 12-months period ended June 30, 2009:

- a. NWE’s actual 12-month cost per Dkt.
- b. The 12-month cost per Dkt that would have been experienced without NWE’s fixed-price hedges.
- c. NWE’s actual total net gas cost.
- d. The 12-month total net cost that would have been experienced without NWE’s fixed-price hedges.

MCC-23

RE: Hard Target Transactions
Witness: J.M. Smith

With respect to JMS-9, Line 20, through JMS-10, Line 6:

- a. Please define and describe the term “fixed price physical swap.”
- b. Please provide copies of all contracts relating to the transactions shown there.
- c. Please provide copies of workpapers showing how the “3.5 Bcf of supply” and “average price of \$3.16/Dkt” amounts referred to in the referenced testimony were developed.

MCC-24

RE: Workpapers
Witness: Patrick J. DiFronzo and W.M. Thomas

Please provide all workpapers, including all input data, used to produce the prefiled testimonies and exhibits of Mr. DiFronzo and Mr. Thomas.