

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

IN THE MATTER OF NorthWestern Energy's) REGULATORY DIVISION
Application for Approval of Electric Supply)
Deferred Cost Account Balance and) DOCKET NO. D2011.5.38
Projected Electric Supply Costs)

MOTION TO INTERVENE OF DISTRICT XI, HUMAN RESOURCE
COUNCIL AND NATURAL RESOURCES DEFENSE COUNCIL

The Natural Resources Defense Council (NRDC) and the Human Resource
Council (HRC), District XI hereby move to intervene in the above-captioned proceeding.

Movants

NRDC is a not-for-profit corporation dedicated to the preservation of the earth's
natural resources, including its air, land, and water resources that are impacted by electric
power production and delivery. NRDC maintains several offices in the United States,
including one at 111 Sutter St., 20th Floor, San Francisco, CA 94104.

Supported by over 500,000 members across the nation, including approximately
3,000 Montana members, NRDC has demonstrated a long-standing interest in protecting
Montana's environmental quality from degradation due to the production, transmission,
and distribution of energy. For over two decades NRDC has been actively involved in
issues related to the efficient use of energy, low-income energy services, and
environmentally preferred renewable power generation in Montana. In furtherance of
these objectives, over the years NRDC has been a party in numerous formal and informal

proceedings before the Commission. In particular, NRDC has focused its attention on the benefits to customers, the utility, and to the environment from utility acquisition of efficiency.

Human Resource Council, District XI is a Montana non-profit corporation that serves Missoula, Mineral, and Ravalli Counties. Its offices are at 1801 S. Higgins, Missoula, Montana 59801.

Human Resource Council, District XI was established in 1965 as a result of the federal "War on Poverty." The organization seeks to alleviate poverty and enhance the public health and welfare. Since its inception HRC, District XI has been actively involved in serving thousands of low and moderate-income residents of western Montana with a variety of programs. Over the years District XI has participated in numerous proceedings before the Commission in order to ensure responsible energy development and the delivery of low-cost, reliable energy supplies to Montana consumers. In particular, District XI has advocated for the establishment of fair rates and for energy services for low income citizens in order to ensure that they are not disproportionately burdened by energy costs and to fulfill important societal objectives.

Movants Interests and Position

Both HRC, District XI and NRDC have intervened and participated in prior year's tracker dockets. Among the issues addressed in those dockets were matters relating to the functioning and implementation of utility efficiency programs, subjects of particular interest to District XI and NRDC. Recovery of energy efficiency program costs and other issues related to NorthWestern Energy's efficiency programs may become contested issues in this proceeding and District XI and NRDC are entitled to intervene so

as to advance their objectives and also to continue to participate in Commission proceedings concerning these subjects. In addition, District XI and NRDC were intervenors in the Colstrip 4 docket and also have an interest in ensuring appropriate treatment of Colstrip 4 costs. Generally speaking, District XI and NRDC advocate for the adoption of energy policy that produces economically efficient, socially responsible, and environmentally sound outcomes.

As not-for-profit representatives of environmental and low-income groups, District XI and NRDC's interests are unique and cannot be adequately represented by the participation of any other party in this proceeding. Movants will not delay the proceeding or prejudice any party through their intervention, nor will they seek to broaden the issues presented in this docket. Finally, movants will make a unified presentation of their case through counsel and witnesses, should it be necessary to call any.

Service of Documents

Movants request that all documents in this proceeding be served on:

Charles Magraw
501 8th Ave
Helena, MT 59601
(406) 449-3375
c.magraw@bresnan.net

Dr. Thomas Power
920 Evans
Missoula, MT 59801
tom.power@mso.umt.edu

Conclusion

For the foregoing reasons, movants request the Commission to grant this motion to intervene.

Respectfully submitted,

Charles E. Magraw
501 8th Ave.
Helena, MT 59601
(406) 449-3375
(406) 461-3696 (mobile)

Attorney for Natural Resources Defense
Council and Human Resource Council,
District XI

July 1, 2011

CERTIFICATE OF SERVICE

I hereby certify that the above signatory has, this ____ day of July 2011, served the foregoing by electronic delivery and first-class mail, postage prepaid, to the applicant and the Montana Consumer Counsel.