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September 7, 2011

Ms. Kate Whitney
Montana Public Service Commission
1701 Prospect Avenue
P. O. Box 202601
Helena, MT 59620-2601

RE: Docket No. D2011.5.38
Electric Tracker
MCC Set 1 Data Request (001-041) Responses

Dear Ms. Whitney:

Enclosed for filing is one copy of NorthWestern Energy's responses to MCC Set 1 Data Requests (001-041). Copies of the responses are being mailed to the service list in this docket and efiled with the PSC.

Please call Joe Schwartzenberger at 497-3362 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Nedra Chase".

Nedra Chase
Administrative Assistant
Regulatory Affairs

Enclosures
cc: Service List

CERTIFICATE OF SERVICE

I hereby certify that a copy of NorthWestern Energy's ("NWE") Responses to MCC Set 1 (001-041) Data Requests in Docket No. D2011.5.38 has been efiled with Montana Public Service Commission (PSC) and has been mailed to the service list in this Docket on this date.

Date: September 7, 2011

Nedra Chase

Nedra Chase
Administrative Assistant
Regulatory Affairs

A. Service List D2011.5.38

**Nedra Chase
NorthWestern Energy
40 E Broadway
Butte MT 59701**

**Charles Magraw
501 8th Ave.
Helena MT 59601**

**Robert Nelson
Montana Consumer Counsel
111 N. Last Chance Gulch
Suite 1B Box 201703
Helena MT 59620-1703**

**Thomas M. Power
920 Evans Ave.
Missoula MT 59801**

**Ross Richardson
Henningsen Vucurocich
& Richardson
116 W Granite Box 399
Butte MT 59703**

**Joe Schwartzenberger
NorthWestern Energy
40 E Broadway
Butte MT 59701**

**Kate Whitney
Montana PSC
1701 Prospect Box 202601
Helena MT 59620-2601**

North Western Energy
Docket D2011.5.38
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-041)

Data Requests received August 23, 2011

MCC-1. RE: Dave Gates Generating Station
Witness: Mike Cashell

Please explain in detail the Company's on-going practices and procedures to monitor the market for potential purchasing opportunities of regulation requirements that may be more economical than DGGs operation.

RESPONSE:

See the response to Data Request MCC-2.

North Western Energy
Docket D2011.5.38
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-041)

Data Requests received August 23, 2011

MCC-2. RE: Dave Gates Generating Station
Witness: Mike Cashell

Please identify each opportunity to purchase regulation service in 2010 (for 2011) and in 2011 and all known potential opportunities for future years and explain why each such opportunity has thus far been forgone.

RESPONSE:

MPSC Final Order 6943a, Paragraph 262, in Docket No. D2008.8.95 requires NWE to continue to pursue market alternatives that may be cost-effective compared to dispatching DGGS. The attached documents describe NWE's ongoing efforts to comply with this order:

- a Memorandum from Mike Cashell dated February 15, 2010, which was included in the 3rd Quarterly Construction Report for DGGS;
- a second Memorandum from Mike Cashell dated November 18, 2010, which was included in the 6th Quarterly Construction Report for DGGS, and
- the 2009 RFP and mailing list referenced in the memos.

MEMORANDUM

TO : Jason Williams

FROM: Mike Cashell

DATE: February 15, 2010

CC : Dave Gates Dick Garlish

RE : Economic Operation of Mill Creek Generation Station and Regulating Reserve RFP

As you are aware, the Mill Creek Generation Station ("MCGS") Final Order requires NorthWestern to act in accordance with Paragraph 262:

262. NWE expects construction of MCGS to be completed by the end of 2010. NWE's current contracts for regulation service expire on December 31, 2010, although NWE's response to data request MCC-054 indicates that NWE's current counterparties might be able to provide service through 2012. The Commission encourages NWE to complete the MCGS by the end of 2010 so that regulation service will be assured in the event cost-effective market service is not available. However, NWE must continue to pursue with its current counterparties, and with others, market alternatives that may be cost-effective compared to dispatching MCGS. NWE must continue to issue periodic RFP's for regulation services and evaluate whether within-hour load following services, whether combined with market regulation or MCGS dispatch, would improve the cost-effectiveness of NWE's approach to satisfying control performance criteria. Each quarterly report (discussed in the previous paragraph) must detail NWE's efforts in this regard.

As a result of this requirement, NWE issued an RFP on September 14, 2009 with a deadline of November 2, 2009 to respond. As we testified in the MCGS case and as evidenced by the RFP results, the market for regulation services remains very thin. At the RFP deadline, we received only 2 bids for regulating reserve service.¹ We also received a "within hour" services proposal from a third bidder.

¹ North Western's Independent Monitor received a third bid from another provider

MEMORANDUM – MCGS and Regulating Reserve RFP
February 15, 2010
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The table below summarizes the RFP Responses:

	Capacity (MW)			2011 Regulating Reserve Proposals Annual Cost		3rd Party Transmission \$	Effective Total Cost \$/kW-month	Total Annual Cost \$
	Jan - April	May-Jun	Jul- Dec	\$/kW-month	\$			
Bidder 1	10	20	30	\$12.40	3,224,000	504,000	14.34	3,728,000
Bidder 2 Base	40	40	40	\$6.30	3,984,000	3,148,800	14.86	7,132,800
Bidder 2 - 1st Incremental	30	30	21	\$10.30	3,151,800	2,361,600	18.02	5,513,400
Bidder 2 - 2nd Incremental	11	1	0	\$12.30	566,800	885,920	31.12	1,451,720
Total	91	91	91		10,925,600	6,880,320		17,806,920

As illustrated by the table the one year capacity cost of the contracts combined to provide the equivalent Regulating Reserve as MCGS is about \$17.8 million. In addition, NWE is charged at Mid C Index rates for the energy produced in the regulation process. We mitigate these costs by selling the energy back into the market, again at Mid C rates, and while the energy does tend to net towards zero, we do end up paying the equivalent of 2 transmission hauls for the energy.

In contrast, our MCGS filing estimated the cost of fuel for Mill Creek at MCGS Fuel Costs \$8.5 per DKT. Today's gas cost estimates are much less than that level; currently fuel costs are in the \$6.4/dKt range. NWE has been developing the fuel plan for MCGS based upon energy production that would result from our regulation needs. The amount of energy expected to be produced in the regulation process, including minimum load requirements and assuming 2 unit operation over a year was expected to be about 34 aMW (as described and supported in the MCGS filing).

In order to accurately predict fuel cost in 2011, an hourly analysis of fuel use and heat rates was completed using actual hourly regulation requirements for the calendar year 2007, plus 7 MW for baseload operation (2007 is a subset of the data that was used for the MCGS Application and has been very representative of current needs). This more refined analysis resulted in a total fuel requirement of 31 aMW (7 MW minimum load and 24 MW produced in the regulation process).

which was not submitted until after the RFP deadline. After much internal discussion as well as discussion with the Independent Monitor that conducted the RFP on our behalf, it was determined, per the RFP process and applicable Allegany and Edgar standards, that we not accept that late-filed bid.

MEMORANDUM – MCGS and Regulating Reserve RFP

February 15, 2010

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The other very important part of the MCGS filing described that NorthWestern would sell the energy produced in the regulation process at hourly market rates (or not purchase an equivalent amount of energy) and credit all customers accordingly.

As a result, the analysis also relied on hourly prices for the 2011 Mid-C energy prices as developed by Lands Energy Consulting for the 2009 NWE Energy Supply Resource Procurement Plan. This rate (less \$7/MWH as outlined in the MCGS filing) produced an average of \$43.76/MWH for energy in 2011. Likewise, daily natural gas prices from the same NWE Resource Procurement Plan for 2011 at an average of \$6.37/dKT were inputs to the modeling.

Accordingly, for 2011, under the assumptions described above, the best estimate we have at this time is that the incremental fuel operating costs of MCGS are estimated to be \$22,053,054 and the value of the energy produced and credited back to customers is \$11,915,475 for a net fuel incremental operating cost of \$10,137,579. This compared against the one year capacity cost of the proposed contracts, described above, to provide the equivalent Regulating Reserve as MCGS of about \$17.8 million, yields a difference of about \$7.7 million – well below the capacity costs of the regulating reserve proposals. Finally, incremental operation and maintenance costs of MCGS are estimated to be about \$1.9 million annually. As a result, our recommendation is to plan to primarily operate and depend upon MCGS as our regulation resource in 2011.

As mentioned earlier in this memo, a third bidder offered a product that was intended to meet the definition of “within-hour balancing services”. The product offered is an “Input reduction Service” in which the bidder would offer to reduce the output of some of its facilities, with limitations, in order for NorthWestern to balance resources. The reservation fee for the service would be between \$7.95/kW-month and \$8.25/kW-month. If exercised, there would also be an “energy cost” associated with the energy reduction by the bidder. To be clear, this is not a service responsive to automatic generation control (AGC) nor is it a regulating reserve product that NorthWestern can use to meet its CPS2 requirements. NWE Transmission has determined that this is not a useful product to it as the control area operator at this time.

	2011 Regulating Reserve Proposals							
	Capacity (MW)			Annual Cost		3rd Party Transmission \$	Effective Total Cost \$/kW-month	Total Annual Cost \$
	Jan - April	May-Jun	Jul-Dec	\$/kW-month	\$			
Bidder 1	10	20	30	\$12.40	3,224,000	504,000	14.34	3,728,000
Bidder 2 Base	40	40	40	\$8.30	3,984,000	3,148,800	14.86	7,132,800
Bidder 2 - 1st Incremental	30	30	21	\$10.30	3,151,800	2,361,600	18.02	5,513,400
Bidder 2 - 2nd Incremental	11	1	0	\$12.30	565,800	865,920	31.12	1,431,720
Total	91	91	91		10,925,600	6,880,320		17,805,920

MHI Creek Generating Station
 Annual O&M Expenditures
 Generation Plant Expenses

06/17/09

FERC Account	Item	2+1 Case	2+1 Case Fixed O&M
	(See Section 16.01) Para 1.A. for definition of Major ???		
Operations:			
546	Operations Supervision and Engineering		
	Labor:	650,000	650,000
	Expenses: (NWE Expenses)		
	Travel	50,000	50,000
	Training	10,000	10,000
	Permits and Licenses	10,000	10,000
548	Generation Expenses (Major Only)		
	(To point where electricity leaves for conversion for transmission)		
	Labor	1,425,000	1,425,000
	Operating prime movers, generators, and auxiliary apparatus and switching and other electric equipment		
	Keeping plant log and records and preparing reports on plant operations		
	Testing, checking, cleaning, oiling, and adjusting equipment		
	Miscellaneous Mechanical Systems	160,000	160,000
	Materials and Expenses		
	Water supply expenses from Butte Silver Bow (see sheet)	16,000	16,000
	Water conditioning (RO and Ion Exchange) (see e-mail)	300,000	30,000
	Misc. chemicals, agents, and other devices	300,000	30,000
	Aqueous Ammonia	300,000	30,000
	Dynamo, motor, and generator brushes	15,000	1,500
	Lubricants, control system oils, oil and air filters, valve packing	60,000	6,000
	Water for cooling engines and generators		
	Calibration gases for air quality and other purposes	8,000	800
549	Miscellaneous other power use expenses		
	Labor	425,000	425,000
	General administrative assistance work	15,000	15,000
	Guarding and patrolling plant and yard	100,000	100,000
	Building service	25,000	25,000
	Care of grounds, snow removal, cutting grass, etc.	50,000	50,000
	Miscellaneous labor	50,000	50,000
	Materials and Expenses		
	Building service supplies	5,000	5,000
	First aid supplies, kit, first aid testing, safety equipment	12,000	12,000
	Uniforms and footwear	4,000	4,000
	Communication service	12,000	12,000
	Employee service facilities expenses	5,000	5,000
	Office supplies, printing, stationary, postage, & equipment service	3,000	3,000
	Drinking water	3,000	3,000
	Laundry services	3,000	3,000
	Transportation expense		
	Meals, traveling and incidental expenses	40,000	40,000
	Fuel for heating		
	Water for fire protection or general use		
	Miscellaneous supplies such as hand tools, cranes, saw blades, files, nuts, bolts, washers, etc.	15,000	15,000
	Research, development, and demonstration expenses		
	Navigation expenses	100,000	100,000
	Carbon Offsets	see below	see below
	Annual Generating Plant Operation Expense (Less Fuel)	4,258,000	3,133,000
Maintenance:			
551	Maintenance Supervision and Engineering (Minor only)		
	Labor:	500,000	500,000
	Expenses: (NWE Expenses)		
	Travel	10,000	10,000
	Training	5,000	5,000
552	Maintenance of Structures (Labor)		
	Includes maintenance of facilities, including items in Acct 341, Structures and Improvements, & Acct 342, Fuel Holders, Purocers & Acc	100,000	100,000
	Structures and Improvements, & Acct 342, Fuel Holders, Purocers & Acc	50,000	30,000
553	Maintenance of generating and electric plant (Labor)		
	Acct 343 Prime Movers	450,000	450,000
	Main inspection and overhaul costs (see sheet) (Start in year 4)	500,000	30,000
	Water CO and SCR catalyst replacement (see sheet) (Start in year 4)	0	0
	Acct 344 Generators	15,000	1,500
	Acct 345 Accessory Electrical Equipment (including plant control system)	100,000	10,000
554	Maintenance of miscellaneous other power generation class		
	Acct 346 Miscellaneous Power Plant Equipment	100,000	100,000
	Acct 349 Miscellaneous Power Plant Equipment	60,000	6,000
	Annual Generating Plant Maintenance Expense	1,778,000	1,342,500
	Total Annual Generating Plant Expense before Carbon Offsets	6,028,000	4,475,500
	Total Annual Generating Plant Expense after Carbon Offsets	6,028,000	4,475,500
547	Fuel (Delivered)		
	Shutdown (NW)	2	2
	Low case	25,100,000	730,079
	Median case -> BARE ASSUMPTION	34,199,999	1,000,000
	High case	43,800,000	1,204,457
	Fuel Conditioning Costs		

MHI Creek Generating Station
 Annual O&M Transmission Expenditures
 Electric Station Expense

FERC Account	Item	2+1 Case	2+1 Case Fixed O&M
Operations:			
540	Operations Supervision and Engineering		
	Labor:	25,000	25,000
	Expenses:		
	Travel	8,000	8,000

2007 Regulation Data Applied to 2011 Gas & Power Rates

* 7 aMW minimum turndown added to hourly regulation to determine heat rate

Total average plant production	31	aMW
Total average regulation	24	aMW
Total average baseload	7	aMW
Total average plant heat rate	13,831	(Btu /KWh)

Total Plant Production Costs & Credits

Annual Gas Cost	\$ 22,053,054	\$6.37 avg
Annual Variable O&M	\$ 1,906,156	\$ 7.00 /MWH
Annual Revenue Credit	\$ (11,915,475)	mid-c -\$7 (avg \$43.76)

Net Variable Cost of Regulation \$ **12,043,735**
2007 data applied to 2011 price forecasts

Cost of Proposed Contracts in RFP \$ 17,805,920

2011 Savings Operating MCGS \$ **5,762,185**

MEMORANDUM

TO : Jason Williams

FROM: Mike Cashell

DATE: November 18, 2010

CC : Dave Gates Pat Corcoran

RE : Quarterly Report on MCGS including Economic Operation of MCGS

As you are aware, the Mill Creek Generation Station ("MCGS") Final Order 6943a requires NorthWestern to act in accordance with Paragraph 262:

262. NWE expects construction of MCGS to be completed by the end of 2010. NWE's current contracts for regulation service expire on December 31, 2010, although NWE's response to data request MCC-054 indicates that NWE's current counterparties might be able to provide service through 2012. The Commission encourages NWE to complete the MCGS by the end of 2010 so that regulation service will be assured in the event cost-effective market service is not available. However, NWE must continue to pursue with its current counterparties, and with others, market alternatives that may be cost-effective compared to dispatching MCGS. NWE must continue to issue periodic RFP's for regulation services and evaluate whether within-hour load following services, whether combined with market regulation or MCGS dispatch, would improve the cost-effectiveness of NWE's approach to satisfying control performance criteria. Each quarterly report (discussed in the previous paragraph) must detail NWE's efforts in this regard.

As a result of this requirement, NWE issued an RFP on September 14, 2009 with a response deadline of November 2, 2009. As we testified in the MCGS case and as evidenced by the RFP results, the market for regulation services remains very thin. At the RFP deadline, we had received only 2 bids for regulating reserve service from traditional suppliers¹ In my memo to

¹ NorthWestern received a third bid from another provider which was not submitted until after the RFP deadline. After much internal discussion as well as discussion with the

MEMORANDUM – Quarterly Report on MCGS including Economic Operation of MCGS

November 18, 2010
Page 2 of 5

you dated February 15, 2010, I included the table below on the costs associated with the RFP bids received and showed that it was more cost effective to operate MCGS in 2011 by a margin of about \$6 million after factoring in fuel costs and incremental operating and maintenance costs of MCGS.

	Capacity (MW)			2011 Regulating Reserve Proposals Annual Cost		3rd Party Transmission	Effective Total Cost	Total Annual Cost		
	Jan - April	May-Jun	Jul- Dec	\$/kW-month	\$				\$/kW-month	\$
Bidder 1	10	20	30	\$12.40	3,224,000	504,000	14.34	3,728,000		
Bidder 2 Base	40	40	40	\$8.30	3,984,000	3,148,800	14.86	7,132,800		
Bidder 2 First Incremental	30	30	21	\$10.30	3,151,800	2,361,600	18.02	5,513,400		
Bidder 2 Second Incremental	11	1	0	\$12.30	565,800	865,920	31.12	1,431,720		
Total	91	91	91		10,925,800	6,880,320		17,806,920		
2009 -2010 Average Variable Charges								\$ 3,032,844.74		
Total Regulation Contract Costs								\$ 20,838,564.74		
								\$/kW-month 19.06		

An additional cost of our current regulation agreements that was not factored into the analysis in February, but should have been, is the cost of the actual energy and losses that are received from, and delivered back to, our providers as part of the regulation process. This energy production is analogous to the energy that will be produced at MCGS. The average cost under these contracts over the last two years for this energy, its transmission and losses is more than \$3 million dollars. This further adds to the costs of the RFP responses making the MCGS more than \$9 million less expensive to operate than going to the market under economic dispatch based on the assumptions included in my February 15, 2010 memo.

Since this RFP was completed in late 2009/early 2010, I have updated the findings of the February 15, 2010 memo to reflect new information regarding estimated fuel cost and energy values.

Independent Monitor that conducted the RFP on our behalf, it was determined, per the RFP process and applicable Allegany and Edgar standards, that we not accept that late-filed bid.

MEMORANDUM – Quarterly Report on MCGS including Economic Operation of MCGS

November 18, 2010

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Our MCGS filing application with the Montana Public Service Commission (MPSC) in August 2008 estimated the costs of fuel for the MCGS at \$8.5 per DKT for natural gas and \$4.00 per gallon for diesel fuel. Today's fuel cost estimates are much lower. In fact, the costs included in our Application for Interim Rates (Interim Application), which was approved by the MPSC on November 16, 2010, were \$4.41 per DKT for natural gas and \$2.54 per gallon for diesel fuel. Likewise, the Interim Application included an updated revenue credit price based upon current market conditions; we used the Mid-C based market price of \$33.01/MWH less the \$7/MWH adjustment for the market differential/transmission between Montana and the Mid-C market. NWE has developed the fuel plan for MCGS based upon energy production that would result from our regulation needs. The amount of energy expected to be produced in the regulation process, including minimum load requirements over a year, was expected to be about 34 aMW (as described and supported in the original MCGS application with the MPSC).

In order to update the February 2010 analysis for the items reflected above, an hourly analysis of fuel use and heat rates was completed using actual hourly regulation requirements for the calendar year 2007, plus 7 MW for baseload operation (2007 is a subset of the data that was used for the original MCGS application before the MPSC and is very representative of current needs). The original MCGS application described that the energy produced in the regulation process would have value on an hourly basis and hourly energy would be valued at the Mid C rate minus \$7/MWH (valued for this updated analysis at \$26.01/MWH or \$33.01/MWH less \$7/MWH).

Accordingly, for 2011, under the assumptions described above, we have updated our economic analysis for the MCGS. The incremental fuel (gas and diesel) operating costs of the MCGS are estimated to be \$17,813,254 and the value of the energy produced and credited back to customers is \$7,766,274 for a net incremental estimated operating cost of \$10,146,980. Finally, incremental operation and maintenance costs of MCGS are estimated to be about \$1,907,947 annually, for total operating and maintenance costs of \$11,953,928.

Total MCGS Plant Operating Costs & Credits		
Annual Gas Cost (@ 345 days)	\$ 14,527,588	\$4.41 avg
Annual Diesel Cost (@ 20 days)	\$ 3,285,666	\$2.54 avg
Total Annual Fuel Cost	\$ 17,813,254	
Annual Variable O&M	\$ 1,906,947	\$6.39 /MWh
Annual Revenue Credit	\$ (7,766,274)	\$26.01 mid-c - \$7 (avg \$33.01-7) (baseload energy + regulation energy sales credit)
Net Variable Cost of Regulation	\$ 11,953,928	
		\$10.95 /kW-month

MEMORANDUM – Quarterly Report on MCGS Including Economic Operation of MCGS

November 18, 2010
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As a result, the MCGS incremental operating costs are estimated to be \$11,953,928 while the RFP contract costs, including the capacity, transmission and energy charges would be over \$20.8 million. The MCGS continues to be less expensive than the RFP responses by a margin of over \$8.9 million.

In addition to this comparison and in order to provide a sensitivity analysis since the time we conducted the RFP, we assumed continued market availability of regulation service through our three current suppliers, but at the lowest rate currently being offered by our current suppliers, which is under the Avista contract at a cost of \$7.62/kW-month plus the appropriate transmission and energy charges.. That assumption produces the results presented in the table below and a contract total cost of \$17,071,235. Even under this hypothetical scenario, it is more economic to operate the MCGS by over \$5 million annually in 2011.

	2011 Regulating Reserve Proposals at 2009/2010 Avista Rate							Total Annual Cost \$
	Jan - April	Capacity (MW)		Annual Cost		3rd Party Transmission \$/kW-month	3rd Party Transmission \$	
		May - July 15 May-Jun	July 16 - Dec Jul-Dec	\$/kW-month	\$			
Bidder 1 at Avista @ 2009-2010 Rates	40	15	40	7.62	3,181,350	2.00	980,000	4,141,350
Bidder 2 at Avista @ 2009-2010 Rates	10	20	30	7.62	1,981,200	2.00	720,000	2,701,200
Bidder 3 at Avista @ 2009-2010 Rates	40	40	21	7.62	2,738,920	6.15	2,052,000	6,740,920
Bidder 3 at Avista @ 2009-2010 Rates	1	16	0	7.62	274,320	6.15	1,180,800	1,465,120
Total:	91	91	91		8,225,790		5,812,800	14,038,590
2009-2010 Average Variable Charges								\$ 3,032,644.74
Total Regulation Contract Costs								\$ 17,071,234.74
								\$/kW-month 15.63

II) Regional Efforts

Joint Initiatives

Dynamic Scheduling System (DSS)

DSS passed the Factory Acceptance Tests in mid-October. DSS went live on November 1, 2010. The DSS users need to supply OATI with a list of users and the functions that these users are fulfilling.

MEMORANDUM – Quarterly Report on MCGS including Economic Operation of MCGS

November 18, 2010

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ITAP

The Intra-Hour Transaction Accelerator Platform (ITAP) agreements with OATI have been finalized. It is anticipated that ITAP will be completed the first quarter of 2011.

Within Hour Scheduling

The Joint Initiatives' Services and Products Group continues discussions to develop a standard business practice for the WECC region for within hour scheduling. The group plans to have a standard practice developed by the end of June 2011 allowing parties to make within hour schedule changes. It is anticipated that if a standard practice is developed and adopted by the group, NWE will modify its OATT to allow this practice pending a review of the impacts of this practice on work load for the real time dispatchers.

ACE Diversity Interchange

The ACE Diversity Interchange (ADI) project has been suspended since December 24, 2009 due to concerns about meeting North American Electric Reliability Corporation (NERC) and Western Electricity Coordinating Council (WECC) compliance standards. The issue concerns the definition of Pseudo-ties and the ADI corrections used by each participating Balancing Area (BA). In the original implementation each BA could take all of the correction, part of the correction or none of the correction depending on the impact on the individual BA's Area Control Error (ACE). One change the parties are making is for the BAs to implement the ADI correction when received without regard to the impact on their ACE. This will insure that the sum of the corrections between the ADI parties will always net to zero. Most of the parties seem to be in the position that continuing to repay the hourly net corrections through inadvertent interchange is still appropriate. Most of the current participants except for BPA will be participating when ADI is re-enabled.

Attachment 1 - Request For Proposal
For
Regulating Reserve Service
To
NorthWestern Energy
Transmission Services
September 14, 2009

With this Request for Proposal ("RFP"), NorthWestern Energy ("NWE") Transmission Services invites your proposal to provide regulating reserve service and other potential within-hour services in order to meet its control performance standards and to optimize the operation of the Mill Creek Generation Station ("MCGS"). Generally, respondents to this RFP must be able to provide firm regulating reserve service to NWE that will be used to respond to NWE's continuous need to balance instantaneous resources with instantaneous load.

NWE will evaluate the proposals based on the following criteria:

a) Price of service

Respondents should provide a clear description of its pricing basis, and respondents are strongly encouraged to follow the suggested pricing concepts outlined in the "Requirements" section below

and

b) Ability to perform service

The respondent must provide documentation to support its ability to provide this type of service as required within this RFP. This documentation should include reference lists from parties that have utilized these, or similar, services in the past from the respondent.

The respondents must also satisfy the specific requirements listed in this RFP document.

Requirements:

Regulating Reserve Concepts That Must Be Included in Proposals

Respondents to this RFP must provide the following:

1. Term - Respondents must include a term that would start January 1, 2011. Any length of term will be considered by NWE; however, a minimum of 1 year is required.
2. NWE is seeking up to 102 MW of regulating reserve capacity. That is, at any given time, NWE must have an available range of unloaded Automatic Generation Control ("AGC") responsive capacity of zero to up to 102 MW at any moment of any hour allowing delivery to or from the service provider. Other capacity and energy arrangements that

offer the same or better service may be considered as well. Bidders may submit proposals for any portion up to 102 MW. Any period when service may not be available or is reduced must be clearly described in responses.

3. The regulating reserve service must be firm and must be provided to NWE's balancing authority area. Any transmission required to deliver the service to or receive from NWE's balancing authority must be firm and arranged and paid for by the respondent. NWE will work with respondents to identify potential points of delivery where transmission capacity exists on the NWE system to accept and deliver regulating reserve capacity and energy. Respondents are encouraged to contact NWE in advance of the deadline noted below to discuss Point of Receipt/Point of Delivery options.
4. Proposals must specify the minimum contractual ramp rate of the generating equipment that will be used to provide the regulating reserve service.

Other potential within-hour services will be considered in conjunction with regulating reserve capacity and/or the operation of the MCGS. Other potential within-hour services are any product which is commercially available and sufficient to be used to provide normal regulation margin to meet NERC Control Performance Criteria.

Hardware, Software and Communications

The respondent's proposal must provide for the procurement and cost of the computer interface, hardware and software, from the NWE interface, installed at the successful service provider's location, to the provider's computer system. NWE Energy Management System ("EMS") personnel will provide required hardware and protocol and technical information to the successful bidder. A dedicated communication path must be acquired from the successful provider's equipment to NWE's EMS.

RFP Responses

1. Response Development and Presentation

In addition to the required information requested above, a respondent should provide as a minimum the following information and provisions:

- a) Term and Renewal Options of a Proposed Agreement
- b) Point of Delivery/Point of Receipt to/with NWE's Transmission System
- c) Intervening Transmission Systems and/or Balancing Authorities
- d) Description of Service to be Provided
- e) Regulating reserve service must be dynamically scheduled capacity, which is available at all times to NWE and capable of being integrated into NWE's AGC system.

- f) Pricing Terms and Conditions - NWE suggests that respondents structure bids with a capacity charge for the regulating reserve service along with a cash settlement for the hourly energy that flows between the supplier and NWE as a result of the service. Other pricing arrangements suggested by bidders may also be considered.
- g) Assignment and Termination Provision
- h) Ramp Rate - MW/minute
- i) Contact Person (mailing address, fax, phone, e-mail)

2. Responses

Respondents must reply by package delivery, fax or e-mail on or before the deadline. All prices must be valid until negotiations are concluded.

3. Deadline to Respond

NorthWestern Energy must receive responses on or before November 2, 2009. All responses will be acknowledged with an email message.

4. Commencement

Respondents must be capable of beginning service on January 1, 2011.

Timeline

This is an estimate only and may vary for a variety of reasons.

The proposed procurement and selection process will be carried out in accordance with the following schedule:

<u>Activity</u>	<u>Date:</u>
RFP posted on NWE OASIS Website	09/14/2009
Electronic Solicitation for Request for Proposal	09/14/2009
Pre-Bid Conference	09/28/2009
Deadline to Respond	11/02/2009
Evaluate RFP/Negotiations	11/02/2009 to 01/01/2010
Execution and Filing of Agreements with FERC	Early 2010

NWE, in its sole discretion, reserves the right to modify the Timeline if required.

Selection

Pricing, flexibility, contract term, and diversity will all be considered in selecting the winning bid(s). Any generation facility that is intended to supply firm regulating reserve service to NWE must be fully operational by January 1, 2011 and capable of providing the required service, as determined by NWE in its sole discretion. NWE reserves the right to select any combination or none of the proposals. This is an RFP and no binding legal obligation will be entered into unless and until the successful bidder and NWE negotiate and execute a definitive agreement. Please

note, the successful bidder may be required to provide and file with FERC a Market Power Study to evaluate possible market power concerns in the sale of regulating reserve service into the NorthWestern balancing authority to comply with the Federal Energy Regulatory Commission's filing requirements of the final agreement. Any cost associated with this study will be the responsibility of the successful bidder.

Confidentiality

All responses will be kept confidential by NWE Transmission Services and its Independent Monitor. Because NWE is regulated, NWE may be required to release RFP information to the appropriate regulatory authorities and other intervening parties during the course of regulatory proceedings associated with this process or other regulatory proceedings. NWE has retained the services of Brown, Williams, Moorhead & Quinn Inc., Energy Consultants, ("BWMQ") to perform the duties of Independent Monitor for the RFP process. NWE will release RFP information to BWMQ as needed to enable BWMQ to perform these duties.

Contact

Questions and Individual to Receive Proposals:

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FortisBC
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Grant County PUD
Grant County PUD
Grant County PUD
Great Northern
Idaho Power Company
Idaho Power Company
Idaho Power Company
Idaho Power
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Los Angeles Department of Water and Power
Los Angeles Department of Water and Power
MAXIM Power Corp
Montgomery Energy Partners
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NRG Power Marketing, Inc.
Oak Creek Energy Systems, Inc.
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NorthWestern Energy
Docket D2011.5.38
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-041)

Data Requests received August 23, 2011

MCC-3. RE: Energy Supply Hedging Strategy
Witness: Kevin J. Markovich

In your testimony at pages KJM-4, lines 1-4 you state that the Hedging Strategy guided electricity supply procurement activities during the 2010/2011 tracking period. Please provide a detailed description, including terms, quantity, price, etc., of the portfolio of energy supply resources and purchases that was assembled during the 2010/2011 tracking period following NWE's Energy Supply Hedging Strategy. In so doing, please provide a detailed tabulation and documentation showing the results of each financial and physical hedge, including but not limited to, amounts paid by and to the company in each hedge and the resulting supply cost for each hedge compared to alternative contemporaneous spot purchase costs.

RESPONSE:

See Exhibit_(FVB-1_Rev.)_10-11 on the CD provided in response to Data Request PSC-001(a) as well as additional documents on the CD provided in response to Data Request PSC-001(e). In addition, refer to the response to Data Request MCC-10. There were no financial hedges. NWE has not performed an analysis comparing each hedge to alternative contemporaneous spot purchase costs.

NorthWestern Energy
Docket D2011.5.38
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-041)

Data Requests received August 23, 2011

MCC-4. RE: Energy Supply Hedging Strategy
Witness: Kevin J. Markovich

The Energy Supply Hedging Strategy described in Appendix 1 to the 2009 Electric Supply Resource Procurement Plan is intended, among other things, to dampen the effect of market price volatility. Please provide all communications, documents, and workpapers that show how the hedging strategy has reduced market price volatility. Please also identify other alternatives to reduce costs and cost volatility that you believe were not as good as results obtained under the hedging strategy.

RESPONSE:

NWE has not performed any studies to document how the hedging strategy has reduced market price volatility as it is known without further analysis that entering into fixed price transactions completely eliminates the volatility for that portion of supply for that period of time. Volatility is defined as a measurement of the price fluctuation of an underlying instrument that takes place over a certain period of time. When a fixed price purchase is made for a certain period of time, the price paid for that volume of energy cannot change, regardless of what happens to market prices thereafter.

NorthWestern Energy
Docket D2011.5.38
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-041)

Data Requests received August 23, 2011

MCC-5. RE: Hedging/Procurement Plan
Witness: Kevin J. Markovich

Page 169 (Appendix 1) of the Electric Supply Resource Procurement Plan states that the Company's hedging strategy is intended to dampen price volatility (increase stability) and improve the probability of cost recovery for NorthWestern. No mention is made of reducing costs for customers. Is it NorthWestern's view that customers would prefer stable high prices as opposed to more variable low prices? Please explain your answer and why lower costs for customers is not a goal of NWE's hedging strategy.

RESPONSE:

NWE is obligated to pursue the objective of providing electric service at the lowest long-term total cost while at the same time cost-effectively mitigating risks associated with providing that service (ARM 38.5.8203). NWE's overall procurement strategy as described in the 2009 Electric Supply Resource Procurement Plan is geared toward meeting both of these objectives. The Hedging Strategy is just one aspect of NWE's overall procurement strategy and is focused on the risk-mitigation goal.

NorthWestern Energy
Docket D2011.5.38
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-041)

Data Requests received August 23, 2011

MCC-6. RE: Hedging/Procurement Plan
Witness: Kevin J. Markovich

Is NWE seeking Commission authorization to engage in financial hedging for electric supply? If so, please explain why the Commission should grant such authorization in view of the Company's very costly experience with gas supply financial hedging.

RESPONSE:

No.

NorthWestern Energy
Docket D2011.5.38
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-041)

Data Requests received August 23, 2011

MCC-7. RE: Energy Supply Hedging Strategy
Witness: Kevin J. Markovich

In the process of electric supply procurement under the hedging strategy for 2010-2011 and 2011-2012 tracking periods, has NWE “locked-in” or financially hedged material amounts of supply? If so, please identify in detail each of these supplies.

RESPONSE:

NWE has entered into physical hedges to lock in material amounts of supply in those periods. NWE has not entered into any financial hedges. Please see the response to Data Request MCC-10 for a list of the physical hedges.

NorthWestern Energy
Docket D2011.5.38
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-041)

Data Requests received August 23, 2011

MCC-8. RE: Energy Supply Hedging Strategy
Witness: Kevin J. Markovich

NWE has used financial swaps for natural gas operations for many years. Please describe and quantify the pros and cons that NWE has encountered working with such swaps, and describe the savings and or costs from such practice to NWE customers.

RESPONSE:

This data request is beyond the scope of this docket.

NorthWestern Energy
Docket D2011.5.38
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-041)

Data Requests received August 23, 2011

MCC-9. RE: Hedging/Procurement Plan
Witness: Kevin J. Markovich

Does NWE admit that its historic financial hedging for gas supply has added many millions of dollars to gas utility costs and customer bills, as compared to what costs would have been without financial hedges? If denied, please provide a complete explanation.

RESPONSE:

See response to Data Request MCC-8.

NorthWestern Energy
Docket D2011.5.38
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-041)

Data Requests received August 23, 2011

MCC-10. RE: Systematic and Defined Market Purchases
Witness: Kevin J. Markovich

One of the areas of the Hedging Strategy described in Appendix 1 is entering into systematic and defined market purchases. For each of the quarters and months in the 2011 and 2012 calendar years, please provide a list of the forecasted supply needs that were fixed price hedged, detailing source/supplier, terms, price, quantity, etc.

RESPONSE:

See attached.

Data Request - MCC-10 - 20110830

Deal Numb	Transaction Type	Counterparty	Trade Date	Start Date	End Date	Term	MW	Pricing Type	Price
13070	Purchase	PPL EnergyPlus	5/21/2009	7/1/2010	6/30/2017	6*16	25	Fixed	60.3
8798	Purchase	Citigroup Energy Inc	10/24/2008	7/1/2010	6/30/2020	1*24	25	Fixed	62.4
19666	Purchase	BP Energy	3/10/2010	1/1/2011	12/31/2011	6*16	25	Fixed	48
20960	Purchase	BP Energy	11/30/2010	1/1/2011	1/31/2011	6*16	25	Fixed	35.85
21203	Purchase	Citigroup Energy Inc	12/17/2010	1/1/2011	1/31/2011	6*16	25	Fixed	33
21186	Purchase	Morgan Stanley	12/14/2010	1/1/2011	1/31/2011	6*16	25	Fixed	36.25
33	Purchase	PPL EnergyPlus	7/5/2006	1/1/2011	3/31/2011	6*16	275	Fixed	50.55
59	Purchase	PPL EnergyPlus	7/5/2006	1/1/2011	3/31/2011	6*8 1*24	150	Fixed	50.55
15677	Purchase	Turnbull Hydro	11/11/2009	4/1/2011	12/31/2030	1*24	13	Fixed	65.25
22206	Purchase	Morgan Stanley	3/2/2011	4/1/2011	4/30/2011	6*16	25	Fixed	23
34	Purchase	PPL EnergyPlus	7/5/2006	4/1/2011	6/30/2011	6*16	275	Fixed	50.95
60	Purchase	PPL EnergyPlus	7/5/2006	4/1/2011	6/30/2011	6*8 1*24	150	Fixed	50.95
23272	Purchase	United Materials of Great Falls	5/27/2011	6/1/2011	8/31/2011	1*24	2	Fixed	51.15
23032	Purchase	Shell Energy North America	5/10/2011	6/1/2011	6/30/2011	6*8 1*24	100	Fixed	0.35
23319	Purchase	Black Hills Power	5/31/2011	6/1/2011	6/30/2011	6*16	83	Fixed	16.35
35	Purchase	PPL EnergyPlus	7/5/2006	7/1/2011	9/30/2011	6*16	275	Fixed	51.35
61	Purchase	PPL EnergyPlus	7/5/2006	7/1/2011	9/30/2011	6*8 1*24	150	Fixed	51.35
21959	Purchase	Shell Energy North America	2/11/2011	7/1/2011	7/31/2011	6*16	50	Fixed	33
22142	Purchase	Avista Corp	2/25/2011	7/1/2011	7/31/2011	6*16	25	Fixed	29.5
22788	Purchase	Powerex	4/19/2011	7/1/2011	7/31/2011	6*16	25	Fixed	24.65
23692	Purchase	Citigroup Energy Inc	6/28/2011	7/1/2011	7/31/2011	6*16	25	Fixed	30.1
24079	Purchase	Citigroup Energy Inc	7/26/2011	8/1/2011	8/31/2011	6*16	25	Fixed	38.5
24084	Purchase	Citigroup Energy Inc	7/26/2011	8/1/2011	8/31/2011	6*16	25	Fixed	38
24098	Purchase	Avista Corp	7/27/2011	8/1/2011	8/31/2011	6*16	25	Fixed	38
23722	Purchase	Citigroup Energy Inc	6/30/2011	8/1/2011	8/31/2011	6*16	.25	Fixed	37
23814	Purchase	Citigroup Energy Inc	7/7/2011	8/1/2011	8/31/2011	6*16	.25	Fixed	36
36	Purchase	PPL EnergyPlus	7/5/2006	10/1/2011	12/31/2011	6*16	275	Fixed	51.75
62	Purchase	PPL EnergyPlus	7/5/2006	10/1/2011	12/31/2011	6*8 1*24	150	Fixed	51.75
22602	Purchase	Gordon Butte Wind	3/31/2011	10/31/2011	10/30/2036	1*24	4	Fixed	69.21
37	Purchase	PPL EnergyPlus	7/5/2006	1/1/2012	3/31/2012	6*16	275	Fixed	52.15
63	Purchase	PPL EnergyPlus	7/5/2006	1/1/2012	3/31/2012	6*8 1*24	150	Fixed	52.15
24165	Purchase	BP Energy	8/2/2011	1/1/2012	12/31/2012	6*16	25	Fixed	36.75
24242	Purchase	Barclays Bank PLC	8/8/2011	1/1/2012	12/31/2012	6*16	25	Fixed	35.1
38	Purchase	PPL EnergyPlus	7/5/2006	4/1/2012	6/30/2012	6*16	275	Fixed	52.55
64	Purchase	PPL EnergyPlus	7/5/2006	4/1/2012	6/30/2012	6*8 1*24	150	Fixed	52.55

NorthWestern Energy
Docket D2011.5.38
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-041)

Data Requests received August 23, 2011

MCC-11. RE: Systematic and Defined Market Purchases
Witness: Kevin J. Markovich

Page 172 (Appendix 1) of the Electric Supply Resource Procurement Plan states that NorthWestern's intent is to not have an energy portfolio that is greater than 100% of expected needs during hedging periods. Does NWE agree that being long on energy during these periods would involve substantial costs that are punitive to ratepayers? If so, please explain why it is the Company's intent to limit the energy portfolio to 100% of expected needs rather than to some lower and safer percentage, such as 90%.

RESPONSE:

NWE does not agree that being long on energy (i.e. being greater than 100% hedged) would necessarily involve substantial costs that are punitive to ratepayers.

NorthWestern Energy
Docket D2011.5.38
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-041)

Data Requests received August 23, 2011

MCC-12. RE: Physical Exchanges and Shape Swaps
Witness: Kevin J. Markovich

Has NWE procured any energy supply in the 2010-2011 or 2011-2012 tracking periods using physical exchanges and shape swaps as a hedging strategy? If so, please provide details of each of the transactions.

RESPONSE:

See the attached confirmation of the physical exchange that was in existence during these periods. No shaped swaps were done during these periods.



CREDIT SUISSE ENERGY LLC

11 Madison Avenue Telephone 212-328-2000
New York, NY 10010 www.credit-suisse.com

11 December 2008

NorthWestern Corporation
125 South Dakota Avenue
Sioux Falls, SD 57104
United States

Reference ID: 1856327 - 1

-
1. This confirmation letter shall confirm the Transaction agreed to on 10 December 2008 (Trade Date) between Credit Suisse Energy, LLC ("CSE") and NorthWestern Corporation ("Counterparty") regarding the sale/purchase of the Product under the terms and conditions as follows:

Physical Power Exchange Fee Payer ("Fee Payer");	CSE
Physical Power Exchange Fee Receiver ("Fee Receiver");	Counterparty
Product:	Physical Power Exchange where Physical Power Exchange shall mean the Fee Payer shall receive Contract Quantity from Exchange Fee Receiver at CSE Point of Receipt and simultaneously the Exchange Fee Payer shall deliver Contract Quantity at to Exchange Fee Receiver at CSE Point of Delivery.
Physical Power Exchange Fee:	The Fee Payer shall pay the Fee Receiver USD 3.00 per MWH
Delivery Period: Begin Date:	1 July 2010
End Date:	30 June 2015
Schedule:	Hour Ending (HE) 0100 through (HE) 2400 (24 hours each day), Monday through Sunday, Pacific Prevailing Time (PPT)



CREDIT SUISSE

Contract Quantity: 25 MW per hour

Total Contract Quantity: 1,095,600 MWH

CSE Point of Receipt: Mid - C

CSE Point of Delivery: NWE System: where NWE System means any available interconnection point on the NorthWestern Energy transmission system where Counterparty can take delivery pursuant to its existing Network Transmission Agreement

Service Type: WSPP Schedule C with Liquidated Damages

NERC Holiday: North American Electricity Reliability Council (NERC) as reflected from time to time on its website currently located at <http://www.nerc.com/~oc/offpeaks.html>, or any successor thereto.

Bookout Clause: CSE has the right to "Bookout" this Transaction with NWE in accordance with the "Bookout Notification Parameters" and the "Bookout Fee" as defined below.

Where,

Bookout means the Parties agree to be relieved of all obligations under this Transaction as of the Bookout Effective Date.

Bookout Notification Parameters means CSE must provide written notification to NWE at least 30 days prior to the date upon which the Bookout becomes effective, the "Bookout Effective Date".

Bookout Fee means the amount CSE shall pay to NWE as the sole remedy for the termination of the Transaction. The Bookout Fee shall be calculated by multiplying \$4/MWH by all remaining MWH in the contract as of the Bookout Effective Date.

2. This transaction is governed by definitions and provisions of the WSPP Agreement, as such agreement may be amended from time to time. In the event of any inconsistency between the WSPP Agreement and this Confirmation, this Confirmation will prevail.





3. Contact information:

Ricardo A. Harewood 212-325-8678
Dean Brier 212-325-8648
Fax: 212-951-8823
Email: energy.confirms@credit-suisse.com

Please execute and return this Confirmation to us, or provide notice of a dispute of any terms, or request a correction of any error via fax at (212) 951-8823 or via email to energy.confirms@credit-suisse.com herein within five (5) Local Business Days of the date written above. Your failure to respond within such period shall not affect the enforceability of the Transaction as against you.

Yours faithfully,

Credit Suisse Energy LLC

By: _____

Name: Dean Brier

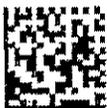
Title: Vice President

Confirmed as of the date first written above;
NorthWestern Corporation

By: _____

Name:

Title:



NorthWestern Energy
Docket D2011.5.38
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-041)

Data Requests received August 23, 2011

MCC-13. RE: Basin Creek Operations
Witness: Kevin J. Markovich

Has Basin Creek capacity been freed up due to shaped swaps, as Appendix 1 describes as one of the advantages of such hedging products? If so, please provide details of date, hour and the hedging transaction that took place.

RESPONSE:

See response to Data Request MCC-12.

NorthWestern Energy
Docket D2011.5.38
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-041)

Data Requests received August 23, 2011

MCC-14. RE: Colstrip Unit 4 Operations
 Witness: Kevin J. Markovich

In your testimony at pages KJM-4 & KJM-5 you state that during certain months NWE's hedging strategy allowed the Company to take advantage of lower market prices by backing down Colstrip Unit 4 (CU4) and replacing it with market purchases. Please provide comparison data showing the hours during the 2010/2011 tracking period when supply from CU4 was replaced with market supply, and the corresponding costs for that replacement.

RESPONSE:

The table below summarizes the value realized from backing down CU4 and replacing the production with market purchases. The attached CD includes detailed information supporting this summary.

Colstrip 4 Economic Dispatch		
2010		
	MW's	\$ Value
May	2,565	6,916
June	52,114	412,099
July	7,518	69,467
Oct.	706	5,595
Total	62,903	494,076
2011		
	MW's	\$ Value
Jan	11,939	71,776
Feb	8,596	69,658
March	17,314	93,325
April	14,001	94,340
May	21,795	180,976
June	29,493	269,548
Total	103,138	779,623

NorthWestern Energy
Docket D2011.5.38
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-041)

Data Requests received August 23, 2011

MCC-15. RE: Long-term Energy Market Purchases
Witness: Kevin J. Markovich

In your testimony at page KJM-5 you mention two new transactions to supply 25 MW. Please provide a detailed description (including but not limited to price) of these two purchases from separate entities.

RESPONSE:

See attached.



5 The North Colonnade
Canary Wharf
London E14 4BB
United Kingdom
Tel +44 (0)20 7623 2323

To: Northwestern Corporation
125 South Dakota Avenue
Sioux Falls
United States

Attention:

Facsimile Number: 001 651 305 8138
Date: 24 September, 2010
Reference: 23706371

Power Transaction (Fixed Price)

CONFIRMATION

The purpose of this facsimile (this "Confirmation") is to confirm the terms and conditions of the Transaction described below, entered into between Barclays Bank PLC (London Head Office) ("Barclays") and Northwestern Corporation (the "Counterparty") on the date Trade Date specified below (the "Transaction").

This Confirmation supersedes any previous Confirmation or other written communication with respect to the Transaction described below and evidences a complete binding agreement between you and us as to the terms of the Transaction described below. This Confirmation constitutes a "Confirmation" as referred to in the Agreement specified below.

This Confirmation supplements, forms a part of, and is subject to the ISDA Master Agreement dated as of 17 September, 2009, as amended and supplemented from time to time (the "Agreement") between you and us. All provisions contained in the Agreement govern this Confirmation except as expressly modified below.

In the event of any inconsistency between this Confirmation and any other relevant governing document, this Confirmation will govern for purposes of the Transaction. Capitalized terms used in this Confirmation and not defined in this Confirmation shall have the respective meanings assigned in the Agreement.

Each party represents to the other party that (absent a written agreement between the parties that expressly imposes affirmative obligations to the contrary):

- (a) **Purpose.** It is entering into the Transaction for the purposes of hedging its assets or liabilities or in connection with a line of business.

The terms of the particular Transaction to which this Confirmation relates are as follows:

Trade Date: 21 September, 2010

Seller: Barclays

Buyer: Counterparty

Product: Mid Columbia, Firm Energy (LD)

Contract Quantity: "Contract Quantity" shall mean in respect of the Delivery Period, the product of the Quantity and the total number of hours in such Delivery Period, expressed in MWh. For the purposes of this Transaction, this amount will be 614,000.00 MWh.

Quantity: 25.00 MW per hour

Delivery Point: Mid - Columbia

Contract Price: USD 30,178,100.00

Energy Price: "Energy Price" shall mean a price expressed in USD per MW. For the purposes of this Transaction, such price will be USD 49.15 per MW.

Delivery Period: In respect of each Calculation Period, and further in respect of each Monday to Saturday inclusive therein, from 01 July, 2012 to and including 30 June, 2017, but excluding North American Electric Reliability Council ("NERC") holidays, each of the sixteen (16) "peakload" hours during such day, beginning at and including the hour ending 07:00 hours Pacific Prevailing time and ending at and including the hour ending 22:00 hours Pacific Prevailing time on such day.

Other Charges: Not applicable

Special Conditions: Not applicable

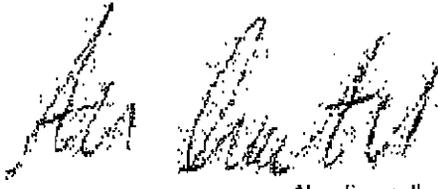
Scheduling: Toll free 24-hour no.: +1 (0) 866-861-0478 (Real Time)
+1 (0) 866-304-2113 (Day Ahead)

The time of dealing will be confirmed by Barclays Bank PLC upon written request.

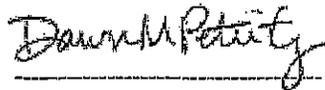
Please confirm that the foregoing correctly sets forth all the terms and conditions of our agreement with respect to the Transaction by responding within two (2) Business Days by promptly signing in the space provided below and faxing the signed copy to Barclays, Commodities Transaction Documentation & Management Group, toll-free facsimile number 1-866-871-3834, or alternatively to standard facsimile number +44 (0)20-7516-7484 / +44 (0)20-7773-6494, telephone +44 (0)20-7773-0172 / 5490 / 6472. Your failure to respond within such period shall not affect the validity or enforceability of the Transaction as against you. This facsimile shall be the only Confirmation documentation in respect of this Transaction and accordingly no hard copy versions of this Confirmation for this Transaction shall be provided unless the Counterparty requests.

For and on behalf of
BARCLAYS BANK PLC

For and on behalf of
NORTHWESTERN CORPORATION



Alex Instrall



NAME: Alex Instrall
Authorised Signatory
Date: 24 September 2010

NAME:
Authorised Signatory
Date: 10/04/10

Please fax confirmations to 651-305-8138 or send to
dawn.petritz@northwestern.com.

Thanks!

WSPP Agreement Service Schedule C – Confirmation

Confirmation Date: Sep 22, 2010

Deal Number: XXXXXXXX

015 300262

1. Transaction Specific Agreement

The undersigned Parties agree to a physical energy transaction pursuant to the WSPP Agreement, Service Schedule C, and the Master Confirmation Agreement under the WSPP Agreement between the Parties as further provided below:

Seller: TransAlta Energy Marketing (U.S.) Inc. ("TEMUS"), sometimes referred to as Seller, Party or collectively with NWE, Parties.

Purchaser: NorthWestern Corporation dba North Western Energy ("NWE"), sometimes referred to herein as Purchaser, Party or collectively with TEMUS, Parties.

Period of Delivery: July 1, 2012 through June 30, 2017

Schedule (Days and Hours): Peak Hours

Peak Hours are defined as HE 0700 through HE 2200 PPT, Monday through Saturday, excluding NERC observed holidays. Off-Peak hours are defined as HE 0100 through HE 0600 and HE 2300 and HE 2400, Monday through Saturday, all day Sunday and NERC observed holidays.

Scheduling:

At the Point of Delivery ("POD"), TEMUS shall schedule the Delivery Rate each hour in accordance with the WECC scheduling calendar and the WECC Business Practices. TEMUS agrees to tag the transactions for scheduling purposes.

Delivery Rate:

Period	July 2012 – June 2017
Delivery Rate (MW/h)	25

Seller will deliver Product to the POD in an amount equal to the Delivery Rate. Seller may replace deliveries at the Alternate POD identified below, or some other mutually agreeable delivery point.

POD: NWE Transmission System – seller can select any point on NWE’s Transmission System in accordance with the Scheduling section above

Alternate POD: Mid Columbia upon mutual consent of both parties

Product: WSPP Schedule C with Contingency (Operating) Reserves, as amended from time to time

Contract Quantity: 614,000 MWh

Contract Price: \$47.75/MWh USD

Special Conditions:

1) Washington State Engrossed Senate Substitute Bill 6001 (“ESSB 6001”) Compliance

Both parties acknowledge and agree that ESSB 6001 is not applicable to this Transaction as NorthWestern Energy is not an “Electric Utility” operating or serving customers within the State of Washington and the term of the deal does not constitute a “Long Term Financial Commitment” as both such terms are defined in ESSB 6001.

2) Credit

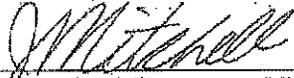
Collateral Threshold for both parties is based on the senior unsecured credit ratings by S&P and Moody's, in the case of TEMUS, the senior unsecured credit rating will be that of its parent company, TransAlta Corporation. In the event of a split rating, the lower of the two shall apply.

Rating S&P/Moody's	Collateral Threshold
BBB+/Baa1	\$5M USD \$30M
BBB/Baa2	\$25M USD
BBB-/Baa3	\$15M USD
BB+/Ba1 or lower	\$0 USD

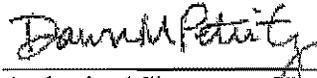
The Minimum Transfer Amount with respect to both Parties is \$100,000 unless the Collateral Threshold for that Party is zero, in which case the Minimum Transfer Amount for that Party will be \$1.00. Any amounts due to be delivered by one Party to the other shall be rounded up to the nearest integral amount of \$100,000. Any amounts due to be returned by one Party to the other shall be rounded down to the nearest integral amount of \$100,000.

TransAlta Energy Marketing (U.S.) Inc.

North Western Corporation dba
North Western Energy



Authorized Signature of Seller
Jason Mitchell # 106561
Settlements Analyst



Authorized Signature of Buyer

Dawn M. Petritz



Name of Seller

SUBMITTED

Name of Buyer

9/30/10

Date **SEP 29 2010**

Date

FOR PAYMENT

NorthWestern Energy
Docket D2011.5.38
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-041)

Data Requests received August 23, 2011

MCC-16. RE: 2010/2011 Default Supply Tracking Period
Witness: Frank V. Bennett

Please provide an electronic working copy of Exhibit__(FVB-1)_10-11, with all links intact, including all workpapers. If actual data for the months of May and June 2011 are available, please provide the updated exhibit.

RESPONSE:

See the CD attached to Data Request PSC-001(a) for the updated electronic copy of Exhibit__(FVB-1_Rev)_10-11.

NorthWestern Energy
Docket D2011.5.38
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-041)

Data Requests received August 23, 2011

MCC-17. RE: 2011/2012 Default Supply Tracking Period
Witness: Frank V. Bennett

Please provide an electronic working copy of Exhibit__(FVB-2)_11-12, with all links intact, including all workpapers.

RESPONSE:

See the CD attached to Data Request PSC-001(a) for the electronic copy of Exhibit__(FVB-2)_11-12.

NorthWestern Energy
Docket D2011.5.38
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-041)

Data Requests received August 23, 2011

MCC-18. RE: 2010/2011 Tiber Supply
Witness: Frank V. Bennett

Please explain in detail why Tiber provided energy most of the months in the tracker period 2010/2011, while in the previous tracker filing it was forecasted to provide energy only during the months of November to April.

RESPONSE:

NorthWestern's contract with Tiber provides for purchases during November through April, which are reflected in forecast trackers. During the remainder of the year, Tiber makes sales to Idaho Power. For the months of May through October in the actual trackers, NorthWestern reflects both a purchase and sale to reflect the Tiber sale to Idaho Power with the exception that during transmission outages Tiber may choose to sell the volumes it would normally sell to Idaho to NorthWestern.

NorthWestern Energy
Docket D2011.5.38
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-041)

Data Requests received August 23, 2011

MCC-19. RE: 2010/2011 Turnbull Hydro Supply
Witness: Frank V. Bennett

Please explain in detail the new contract (terms, price, etc) of Turnbull Hydro and why the cost of \$62.50 per Mwh is considered economical.

RESPONSE:

The Turnbull Hydro, LLC PPA is a 20-year contract for purchases of the output from a 13 MW Community Renewable Energy Project facility that will allow NorthWestern to help meet its obligations under the Renewable Resource Standards of Montana. Purchases under the PPA are at fixed per MWh rates reflected in the following table.

Contract Year	\$/MWh
Year 1	65.25
Year 2	65.50
Year 3	65.75
Year 4	66.00
Year 5	67.75
Year 6	69.15
Year 7	71.25
Year 8	72.25
Year 9	73.25
Year 10	73.25
Year 11	70.25
Year 12	70.50
Year 13	71.75
Year 14	72.75
Year 15	73.25
Year 16	73.25
Year 17	73.50
Year 18	73.50
Year 19	73.75
Year 20	73.75

The quoted cost of \$62.50/MWh includes the lower value initial test energy purchases. The contract was evaluated on a 20-year levelized rate of \$69.50/MWh including RECs at \$7.48/MWh which results in an energy only value of \$62.02/MWh. This PPA is considered economical because it offers long-term schedulable energy under our mandatory renewable guidelines at a levelized rate of \$62.02/MWh compared to our QF-1 Tariff that is based on a levelized rate of \$62.37/MWh. Further, maximum plant output is expected during July which is one of the peak months for supply need.

NorthWestern Energy
Docket D2011.5.38
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-041)

Data Requests received August 23, 2011

MCC-20. RE: 2010/2011 Basin Creek
Witness: Frank V. Bennett

Please explain in detail why Basin Creek supply during the months from October 2010 to April 2011 was much less than expected as forecasted in the previous tracker filing.

RESPONSE:

Our forecasts are based partly on historical values and also on Energy Supply personnel judgment based on industry experience. Operation of Basin Creek is evaluated daily and was impacted during that time frame by falling market prices and also by its ability to be used for NWE's operating reserve needs.

**NorthWestern Energy
Docket D2011.5.38
Electric Tracker**

**Montana Consumer Counsel (MCC)
Set 1 (001-041)**

Data Requests received August 23, 2011

MCC-21. RE: 2010/2011 Operating Reserves
Witness: Frank V. Bennett

Please explain in detail why Operating Reserves cost as shown on line 99, page 4 of Exhibit__(FVB-1)_10-11 was much higher in the last months of the tracker period (e.g., in March 2011 these costs were \$328,630 while in September 2010 they were only \$83,300).

RESPONSE:

March Operating Reserves reflect a \$2.00/MWh increase in the cost of this service compared to the previous September, and the difference also reflects an additional 10 MW of reserve allocation. Please refer to the CD attached to the response to Data Request PSC-001(e) for the reserve invoices.

NorthWestern Energy
Docket D2011.5.38
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-041)

Data Requests received August 23, 2011

MCC-22. RE: 2010/2011 Transmission Costs
Witness: Frank V. Bennett

Please provide all documents and calculations supporting the transmission cost of \$4,878,139 for the 2010/2011 default supply tracking period. Also, please provide the most updated transmission costs as they become available.

RESPONSE:

Please note that this value has been updated in Exhibit__(FVB-1_Rev)_10-11 to \$5,062,048. The updated exhibit is included on the CD attached to the response to Data Request PSC-001(a). Refer to the CD attached to the response to Data Request PSC-001(e) for the transmission invoices.

NorthWestern Energy
Docket D2011.5.38
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-041)

Data Requests received August 23, 2011

MCC-23. RE: 2010/2011 Fixed Price Transactions
Witness: Frank V. Bennett

Please provide all supporting documents for the net fixed price purchase requirement of 483,280 Mwbs during the 2010/2011 default supply tracking period, indicating quantity and price for each sale and purchase.

RESPONSE:

Please note that this value has been updated in Exhibit__(FVB-1_Rev)_10-11 to 547,608 MWbs. The updated exhibit is included on the CD attached to the response to Data Request PSC-001(a). Refer to the CD attached to the response to Data Request PSC-001(e) for the non-base transaction invoices.

NorthWestern Energy
Docket D2011.5.38
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-041)

Data Requests received August 23, 2011

MCC-24. RE: 2010/2011 Market Transactions
Witness: Frank V. Bennett

Please provide all supporting documents for the net market purchase requirement of 1,202,364 MwHs during the 2010/2011 default supply tracking period, indicating quantity and price for each sale and purchase.

RESPONSE:

Please note that this value has been updated in Exhibit__(FVB-1_Rev)_10-11 to 1,232,507 MWWhs. The updated exhibit is included on the CD attached to the response to Data Request PSC-001(a). Refer to the CD attached to the response to Data Request PSC-001(e) for the net market transaction invoices.

NorthWestern Energy
Docket D2011.5.38
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-041)

Data Requests received August 23, 2011

MCC-25. RE: 2010/2011 Administrative Expense
Witness: Frank V. Bennett

Please provide all documents supporting the \$293,604 in administration as shown on page 1 of Exhibit __ (FVB-1)_10-11, line40.

RESPONSE:

Please note that this value has been updated in Exhibit __ (FVB-1_Rev)_10-11 to \$294,396. The updated exhibit is included on the CD attached to the response to Data Request PSC-001(a). Refer to the CD attached to the response to Data Request PSC-001(e) for the administrative expense invoices.

NorthWestern Energy
Docket D2011.5.38
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-041)

Data Requests received August 23, 2011

MCC-26. RE: 2011/2012 Gordon Butte Wind QF
Witness: Frank V. Bennett

Please explain in detail the new contract (terms, price, etc) of the Gordon Butte Wind QF and why the cost of \$69.21 per Mwh is considered economical.

RESPONSE:

The Gordon Butte Wind, LLC PPA is a 25-year contract for purchases of the output from a 9.6 MW Qualifying Facility Project. NorthWestern is required to accept this contract under a Montana Public Service Commission-approved Electric Tariff Schedule QF-1 which provides for the wind energy rate of \$69.21/MWh.

NorthWestern Energy
Docket D2011.5.38
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-041)

Data Requests received August 23, 2011

MCC-27. RE: 2011-12 Tracker Year Billing Statistics
Witness: Cheryl A. Hansen

Please provide an electronic working copy, with all links intact, of Exhibit__(CAH-1)_11-12, including all workpapers.

RESPONSE:

See the CD attached to the response to Data Request PSC-001(a).

NorthWestern Energy
Docket D2011.5.38
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-041)

Data Requests received August 23, 2011

MCC-28. RE: Deferred Supply Rates
Witness: Cheryl A. Hansen

Please provide an electronic working copy, with all links intact, of Exhibit__(CAH-2).11-12, including all workpapers.

RESPONSE:

See the CD attached to the response to Data Request PSC-001(a).

NorthWestern Energy
Docket D2011.5.38
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-041)

Data Requests received August 23, 2011

MCC-29. RE: CU4 Derivation of Rates
Witness: Cheryl A. Hansen

Please provide an electronic working copy, with all links intact, of Exhibit __ (CAH-3).11-12, including all workpapers.

RESPONSE:

See the CD attached to the response to Data Request PSC-001(a).

NorthWestern Energy
Docket D2011.5.38
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-041)

Data Requests received August 23, 2011

MCC-30. RE: DGGS Derivation of Rates
Witness: Cheryl A. Hansen

Please provide an electronic working copy, with all links intact, of Exhibit__(CAH-4).11-12, including all workpapers.

RESPONSE:

See the CD attached to the response to Data Request PSC-001(a).

NorthWestern Energy
Docket D2011.5.38
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-041)

Data Requests received August 23, 2011

MCC-31. RE: Supply Rates
Witness: Cheryl A. Hansen

Please provide an electronic working copy, with all links intact, of Exhibit___(CAH-5).11-12, including all workpapers.

RESPONSE:

See the CD attached to the response to Data Request PSC-001(a).

NorthWestern Energy
Docket D2011.5.38
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-041)

Data Requests received August 23, 2011

MCC-32. RE: Electric Supply DSM Program Spending & Budget
Witness: William M. Thomas

Please provide an electronic working copy, with all links intact, of Exhibit__(WMT-2), including all workpapers.

RESPONSE:

See the CD attached to the response to Data Request PSC-001(a).

NorthWestern Energy
Docket D2011.5.38
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-041)

Data Requests received August 23, 2011

MCC-33. 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.

RESPONSE:

See the CD attached to the response to Data Request PSC-001(a).

North Western Energy
Docket D2011.5.38
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-041)

Data Requests received August 23, 2011

MCC-34. RE: Electric DSM Cost Effectiveness
Witness: William M. Thomas

Please provide an electronic working copy, with all links intact, of Exhibit__(WMT-6), including all workpapers.

RESPONSE:

See the CD attached to the response to Data Request PSC-001(a).

NorthWestern Energy
Docket D2011.5.38
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-041)

Data Requests received August 23, 2011

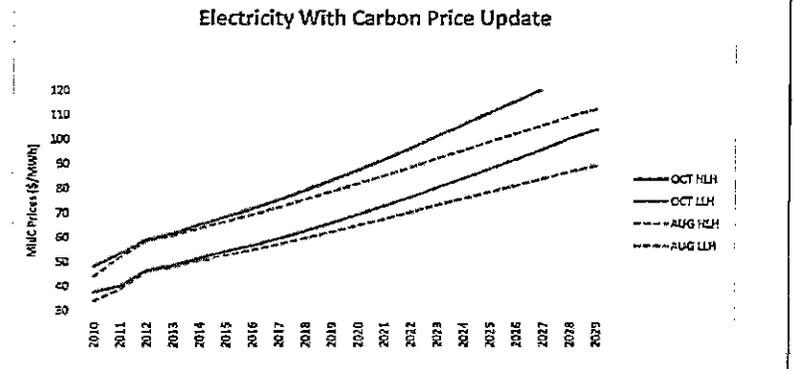
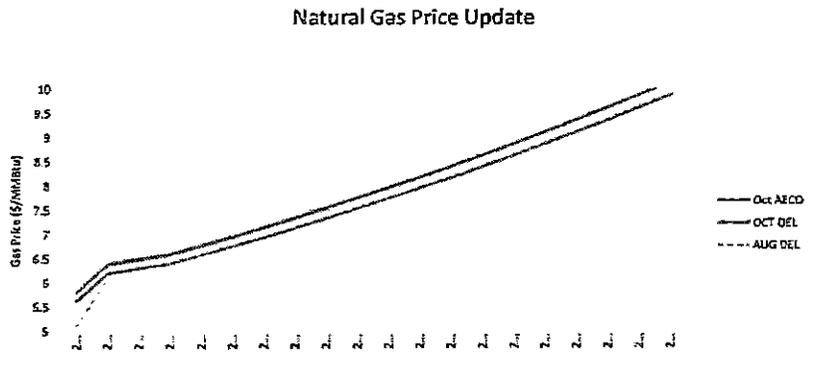
MCC-35. RE: Electric DSM Lost Revenues
Witness: William M. Thomas

On page WMT-30, lines 26-30, you state that NorthWestern has consistently developed DSM resources at a cost that is less than the cost of the marginal resources that DSM displaces or defers. Please provide the avoided cost used for DSM planning in the 2010-2011 tracker period and for the 2011-2012 tracker period, along with all supporting documents and calculations.

RESPONSE:

Please find attached the electric avoided costs used for DSM individual electric conservation measure analysis, program analysis, and planning for the 2010-2011 tracker period. Specifically, refer to column H for the price strip and cell H4 for the 20-year levelized value of \$70.12/MWH. The same electric avoided costs are being used for planning purposes for the 2011-2012 tracker period. Updated electric avoided costs are expected in late 2011 that will be used to re-evaluate all electric conservation measures, programs, and planning activities to assure cost-effectiveness based on the Total Resource Cost (TRC) test.

Year	Result AECO Last	Result Del to NWE Sys	Result Final HLH Price	Result Final LLH Price	Result Final HLH Price	Result Final LLH Price	EMWH Flat	Result Del NW Nat Gas	Result Final HLH Price	Result Final LLH Price	Result Final HLH Price	Result Final LLH Price	Result Del NW Nat Gas	Result Final HLH Price	Result Final LLH Price	Pct Change to October					
2008																					
2010	5.02	5.79	50.86	40.25	47.86	37.25	73.61	5.07	46.75	36.74	43.75	33.74				14%	9%	10%	9%	10%	
2011	6.20	6.37	56.06	42.76	53.06	39.78	47.75	6.07	54.85	41.58	51.85	38.58				5%	2%	3%	2%	3%	
2012	6.30	6.47	60.94	45.49	58.96	40.29	53.88	6.29	56.78	45.40	58.24	45.72				3%	0%	0%	1%	1%	
2013	6.40	6.57	57.86	48.22	61.51	48.28	58.22	6.41	57.99	46.28	60.63	47.63				3%	0%	0%	1%	1%	
2014	6.58	6.75	59.46	47.49	64.97	51.27	60.49	6.59	59.48	47.55	63.68	50.28				3%	0%	0%	2%	2%	
2015	6.76	6.94	61.10	48.80	68.27	53.90	62.52	6.77	61.12	48.87	66.48	52.53				3%	0%	0%	3%	3%	
2016	6.95	7.13	62.78	50.15	71.43	56.42	65.49	6.95	62.61	50.21	69.15	54.67				3%	0%	0%	3%	3%	
2017	7.14	7.33	64.51	51.53	75.02	59.29	68.73	7.15	64.54	51.50	72.11	57.03				3%	0%	0%	4%	4%	
2018	7.33	7.53	66.29	52.95	78.98	62.44	72.37	7.34	66.32	53.02	75.30	59.57				3%	0%	0%	5%	5%	
2019	7.54	7.74	68.12	54.41	83.08	65.71	76.10	7.54	68.15	54.48	78.52	62.15				3%	0%	0%	6%	6%	
2020	7.74	7.95	70.00	55.91	87.33	69.10	80.04	7.75	70.02	55.98	81.80	64.77				3%	0%	0%	7%	7%	
2021	7.98	8.17	71.93	57.45	91.63	72.52	83.96	7.97	71.85	57.53	85.05	67.38				3%	0%	0%	8%	8%	
2022	8.18	8.40	73.81	59.04	96.28	76.23	88.26	8.19	73.94	59.11	89.49	70.11				3%	0%	0%	9%	9%	
2023	8.40	8.63	75.95	60.88	101.25	80.19	92.83	8.41	75.98	60.74	92.08	72.98				3%	0%	0%	10%	10%	
2024	8.63	8.87	78.04	62.34	105.94	83.94	97.14	8.64	78.07	62.42	95.42	75.64				3%	0%	0%	11%	11%	
2025	8.87	9.11	80.19	64.06	110.93	87.96	101.98	8.88	80.22	64.14	98.94	78.43				3%	0%	0%	12%	12%	
2026	9.12	9.36	82.49	65.82	115.73	91.73	106.83	9.13	82.43	65.91	102.20	81.08				3%	0%	0%	13%	13%	
2027	9.37	9.62	84.68	67.64	120.77	95.76	110.77	9.38	84.71	67.72	105.62	83.76				3%	0%	0%	14%	14%	
2028	9.63	9.88	87.01	69.50	126.28	100.15	115.83	9.64	87.04	69.59	109.26	86.70				3%	0%	0%	15%	15%	
2029	9.89	10.16	89.41	71.42	130.74	103.70	119.82	9.90	89.44	71.51	112.24	89.08				3%	0%	0%	16%	16%	



NorthWestern Energy
Docket D2011.5.38
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-041)

Date Requests received August 23, 2011

MCC-36. RE: 2010/2011 CU4 Tracking Period
Witness: Frank V. Bennett

Please provide an electronic working copy of Exhibit__(FVB-4)_10-11, with all links intact, including all workpapers. If actual data for the months of May and June 2011 are available, please provide the updated exhibit.

RESPONSE:

Please see the CD attached to the response to Data Request PSC-001(a) for the updated electronic copy of Exhibit__(FVB-4_Rev)_10-11.

NorthWestern Energy
Docket D2011.5.38
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-041)

Data Requests received August 23, 2011

MCC-37. RE: 2011/2012 CU4 Tracking Period
Witness: Frank V. Bennett

Please provide an electronic working copy of Exhibit__(FVB-5)_11-12, with all links intact, including all workpapers.

RESPONSE:

Please see the CD attached to the response to Data Request PSC-001(a) for the updated electronic copy of Exhibit__(FVB-5)_11-12.

NorthWestern Energy
Docket D2011.5.38
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-041)

Data Requests received August 23, 2011

MCC-38. RE: 2010/2011 DGGGS Tracking Period
Witness: Frank V. Bennett

Please provide an electronic working copy of Exhibit__(FVB-6)_10-11, with all links intact, including all workpapers. If actual data for the months of May and June 2011 are available, please provide the updated exhibit.

RESPONSE:

Please see the CD attached to the response to Data Request PSC-001(a) for the updated electronic copy of Exhibit__(FVB-6_Rev)_10-11.

NorthWestern Energy
Docket D2011.5.38
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-041)

Data Requests received August 23, 2011

MCC-39. RE: 2011/2012 DGGS Tracking Period
Witness: Frank V. Bennett

Please provide an electronic working copy of Exhibit__(FVB-7)_11-12, with all links intact, including all workpapers.

RESPONSE:

Please see the CD attached to the response to Data Request PSC-001(a) for the updated electronic copy of Exhibit__(FVB-7)_11-12.

NorthWestern Energy
Docket D2011.5.38
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-041)

Data Requests received August 23, 2011

MCC-40. RE: 2010/2011 tracking period hedging
Witness: Kevin J. Markovich

On lines 16-17 of page KJM-4 you state that NWE was able to take advantage of lower market prices, "...in part by moving to the bottom end of the hedge spectrum during certain months..." Please explain exactly what is meant by "moving to the bottom end of the hedge spectrum" and list the months during which NWE did this during the 2010/2011 tracking period.

RESPONSE:

See the attached sheets depicting the fixed price hedge positions prior to the beginning of each month during the 2010/2011 tracking period. The "bottom end of the hedge spectrum" refers to the lower limits of the hedging strategy, namely the requirement that NWE is at least 85% but not more than 100% fixed price hedged prior to the beginning of each month. During these periods of declining prices, NWE attempted to be at or near the 85% threshold as opposed to being closer to the 100% threshold. In addition, in many months we waited until very close to the start of the month before making the purchases needed to meet the 85% threshold.

Fixed Price Contracts
 July-10

	Hr 1	Hr 2	Hr 3	Hr 4	Hr 5	Hr 6	Hr 7	Hr 8	Hr 9	Hr 10	Hr 11	Hr 12	Hr 13	Hr 14	Hr 15	Hr 16	Hr 17	Hr 18	Hr 19	Hr 20	Hr 21	Hr 22	Hr 23	Hr 24
PPI HL							275	275	275	275	275	275	275	275	275	275	275	275	275	275	275	275	275	275
PPI LL	150	150	150	150	150	150																	150	150
CU4	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123
Judith GAP	45	45	45	45	45	45	45	45	45	45	45	45	45	45	45	45	45	45	45	45	45	45	45	45
Basin Creek	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
QFs	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100
PP & L	0	0	0	0	0	0	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	0	0
Credit Suisse	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25
Seattle Exchange						100																(100)		
Powerex	25	25	25	25	25	25	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	25	25
Morgan Stanley	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25
Avista							25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25
Portland							50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50
Total Resources	493	493	493	493	493	593	793	793	793	793	793	793	793	793	793	793	793	793	793	793	793	693	493	493
DS Load	596	565	559	559	589	673	795	860	913	968	980	977	974	978	975	976	951	912	870	864	862	799	685	621
(Short) / Long	(93)	(72)	(66)	(66)	(96)	(80)	(2)	(67)	(120)	(175)	(187)	(184)	(181)	(185)	(182)	(183)	(158)	(119)	(77)	(71)	(69)	(106)	(192)	(128)



Fixed Price Contracts
 August-10

	Hr 1	Hr 2	Hr 3	Hr 4	Hr 5	Hr 6	Hr 7	Hr 8	Hr 9	Hr 10	Hr 11	Hr 12	Hr 13	Hr 14	Hr 15	Hr 16	Hr 17	Hr 18	Hr 19	Hr 20	Hr 21	Hr 22	Hr 23	Hr 24	
PPL HL							275	275	275	275	275	275	275	275	275	275	275	275	275	275	275	275	275		
PPL LL	150	150	150	150	150	150																	150	150	
CU4	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	
Judith GAP	45	45	45	45	45	45	45	45	45	45	45	45	45	45	45	45	45	45	45	45	45	45	45	45	
Basin Creek	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
QFs	45	45	45	45	45	45	45	45	45	45	45	45	45	45	45	45	45	45	45	45	45	45	45	45	
PP & L	0	0	0	0	0	0	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	0	
Credit Suisse	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	
Seattle Exchange						100																(100)			
Powerex	100	100	100	100	100	100	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	100	100	
Morgan Stanley	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	
Avista						25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	
Portland						50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	
Total Resources	513	513	513	513	513	613	668	668	668	668	668	668	668	668	668	668	668	668	668	668	668	513	513	15,112	
DS Load	535	517	513	514	545	632	733	790	837	877	888	896	890	896	885	862	828	800	806	805	733	628	569	17,848	
(Short) / Long	(22)	(4)	(0)	(1)	(32)	(19)	(65)	(102)	(140)	(189)	(199)	(200)	(198)	(202)	(198)	(197)	(174)	(140)	(112)	(118)	(117)	(145)	(116)	(56)	(2,736)



Fixed Price Contracts
 September-10

	Hr 1	Hr 2	Hr 3	Hr 4	Hr 5	Hr 6	Hr 7	Hr 8	Hr 9	Hr 10	Hr 11	Hr 12	Hr 13	Hr 14	Hr 15	Hr 16	Hr 17	Hr 18	Hr 19	Hr 20	Hr 21	Hr 22	Hr 23	Hr 24	
PPL HL							275	275	275	275	275	275	275	275	275	275	275	275	275	275	275	275	275	275	
PPL LL	150	150	150	150	150	150																	150	150	
CU4	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	
Judith GAP	42	42	42	42	42	42	42	42	42	42	42	42	42	42	42	42	42	42	42	42	42	42	42	42	
Basin Creek	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
QFs	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	
PP & L	0	0	0	0	0	0	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	0	0	
Credit Suisse	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	
Seattle Exchange						100																(100)			
Powerex	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	
Morgan Stanley	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	
Avista							25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	
Total Resources	515	515	515	515	515	615	690	690	690	690	690	690	690	690	690	690	690	690	690	690	690	590	515	515	15,160
DS Load	493	481	480	494	518	627	695	740	771	791	800	808	809	805	808	810	780	756	755	772	742	666	570	520	15,481
(Short) / Long	22	34	35	31	(3)	(12)	(5)	(50)	(81)	(101)	(110)	(118)	(119)	(115)	(118)	(120)	(90)	(66)	(65)	(82)	(52)	(76)	(55)	(5)	(1,321)



Fixed Price Contracts
 October-10

	Hr 1	Hr 2	Hr 3	Hr 4	Hr 5	Hr 6	Hr 7	Hr 8	Hr 9	Hr 10	Hr 11	Hr 12	Hr 13	Hr 14	Hr 15	Hr 16	Hr 17	Hr 18	Hr 19	Hr 20	Hr 21	Hr 22	Hr 23	Hr 24	
FPL HL							275	275	275	275	275	275	275	275	275	275	275	275	275	275	275	275	275	275	
FPL LL	150	150	150	150	150	150																	150	150	
CU4	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	
Judith GAP	62	62	62	62	62	62	62	62	62	62	62	62	62	62	62	62	62	62	62	62	62	62	62	62	
Basin Creek	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
QFs	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	
PP & L	0	0	0	0	0	0	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	0	0	
Credit Suisse	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	
Seattle Exchange						100																(100)			
Powerex	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	
Morgan Stanley	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	
Avista							25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	
Total Resources	510	510	510	510	510	610	685	685	685	685	685	685	585	510	510	15,040									
DS Load	511	503	501	510	548	669	773	772	770	776	770	771	761	759	765	789	806	813	825	800	744	669	575	533	16,703
(Short) / Long	(1)	7	9	(0)	(38)	(59)	(88)	(87)	(85)	(91)	(85)	(86)	(76)	(74)	(80)	(104)	(121)	(128)	(140)	(115)	(59)	(74)	(65)	(23)	(1,663)



Fixed Price Contracts
 November-10

	Hr 1	Hr 2	Hr 3	Hr 4	Hr 5	Hr 6	Hr 7	Hr 8	Hr 9	Hr 10	Hr 11	Hr 12	Hr 13	Hr 14	Hr 15	Hr 16	Hr 17	Hr 18	Hr 19	Hr 20	Hr 21	Hr 22	Hr 23	Hr 24
PPL HL							275	275	275	275	275	275	275	275	275	275	275	275	275	275	275	275	275	275
PPL LL	150	150	150	150	150	150																	150	150
CU4	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123
Judith GAP	69	69	69	69	69	69	69	69	69	69	69	69	69	69	69	69	69	69	69	69	69	69	69	69
Basin Creek	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
QF's	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100
PP & L	0	0	0	0	0	0	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	0	0
Credit Suisse	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25
Seattle Exchange						100																	(100)	
Powertex	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75
Morgan Stanley	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25
Avista							25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25
Total Resources	567	567	567	567	567	667	742	742	742	742	742	742	642	567	567									
DS Load	544	532	533	541	563	712	827	830	831	830	813	818	804	800	801	843	892	895	895	856	797	707	612	566
(Short) / Long	23	35	34	26	(16)	(45)	(85)	(88)	(89)	(88)	(76)	(76)	(62)	(58)	(59)	(101)	(150)	(153)	(143)	(114)	(55)	(65)	(45)	1
																								(1,419)



Fixed Price Contracts
 December-10

	Hr 1	Hr 2	Hr 3	Hr 4	Hr 5	Hr 6	Hr 7	Hr 8	Hr 9	Hr 10	Hr 11	Hr 12	Hr 13	Hr 14	Hr 15	Hr 16	Hr 17	Hr 18	Hr 19	Hr 20	Hr 21	Hr 22	Hr 23	Hr 24	
PPL HL							275	275	275	275	275	275	275	275	275	275	275	275	275	275	275	275	275	275	
PPL LL	150	150	150	150	150	150																	150	150	
CUA	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	123	
Judith GAP	79	79	79	79	79	79	79	79	79	79	79	79	79	79	79	79	79	79	79	79	79	79	79	79	
Basin Creek	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
QFs	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	
PP & L	0	0	0	0	0	0	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	0	0	
Credit Subs	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	
Seattle Exchange						100																(100)			
Powerax	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	
Morgan Stanley	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	
Avista							25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	
Total Resources	602	602	602	602	602	702	777	777	777	777	777	777	777	777	777	777	777	777	777	777	777	677	602	502	17,248
DS Load	624	616	621	628	667	788	909	904	906	903	893	878	868	855	859	908	974	979	964	928	876	795	600	654	19,576
(Short) / Long	(22)	(14)	(19)	(26)	(65)	(86)	(132)	(127)	(129)	(126)	(116)	(101)	(91)	(78)	(82)	(131)	(197)	(202)	(177)	(151)	(99)	(118)	(88)	(52)	(2,428)



Fixed Price Contracts
 January-11

	Hr 1	Hr 2	Hr 3	Hr 4	Hr 5	Hr 6	Hr 7	Hr 8	Hr 9	Hr 10	Hr 11	Hr 12	Hr 13	Hr 14	Hr 15	Hr 16	Hr 17	Hr 18	Hr 19	Hr 20	Hr 21	Hr 22	Hr 23	Hr 24	
PPL HL							275	275	275	275	275	275	275	275	275	275	275	275	275	275	275	275	275	275	
PPL LL	150	150	150	150	150	150																	150	150	
CU4	222	222	222	222	222	222	222	222	222	222	222	222	222	222	222	222	222	222	222	222	222	222	222	222	222
Judith GAP	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40
Basin Creek	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
QF's	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100
PP & L	0	0	0	0	0	0	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	0	0
Credit Sube	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25
Seattle Exchange						100																		(100)	
PP & L							100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100
Morgan Stanley							25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25
Total Resources	537	537	537	537	537	637	812	712	537	537	17,288														
DS Load	631	622	629	636	681	817	951	940	940	929	911	894	879	868	868	918	979	995	971	943	885	800	702	653	20,042
(Short) / Long	(94)	(85)	(92)	(99)	(144)	(180)	(139)	(128)	(128)	(117)	(99)	(82)	(57)	(56)	(56)	(105)	(167)	(183)	(159)	(131)	(73)	(88)	(165)	(116)	(2,754)



Fixed Price Contracts
 February-11

	Hr 1	Hr 2	Hr 3	Hr 4	Hr 5	Hr 6	Hr 7	Hr 8	Hr 9	Hr 10	Hr 11	Hr 12	Hr 13	Hr 14	Hr 15	Hr 16	Hr 17	Hr 18	Hr 19	Hr 20	Hr 21	Hr 22	Hr 23	Hr 24	
PPL HL							275	275	275	275	275	275	275	275	275	275	275	275	275	275	275	275	275	275	
PPL LL	150	150	150	150	150	150																	150	150	
CU4	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	
Judith GAP	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	
Basin Creek	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
QFs	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	
PP & L	0	0	0	0	0	0	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	0	0	
Credit Suisse	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	
Seattle Exchange						100																(100)			
PP & L							100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	
Morgan Stanley							25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25
Total Resources	515	515	515	515	515	515	790	790	790	790	790	790	790	790	790	790	790	790	790	790	790	690	515	515	16,760
DS Load	602	596	559	607	653	789	910	908	905	892	872	857	840	828	827	873	920	938	924	896	841	756	670	612	19,114
(Short) / Long	(87)	(79)	(84)	(92)	(138)	(174)	(120)	(118)	(115)	(102)	(82)	(67)	(50)	(38)	(37)	(83)	(130)	(149)	(134)	(106)	(51)	(86)	(155)	(97)	(2,354)

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Fixed Price Contracts
 March-11

	Hr 1	Hr 2	Hr 3	Hr 4	Hr 5	Hr 6	Hr 7	Hr 8	Hr 9	Hr 10	Hr 11	Hr 12	Hr 13	Hr 14	Hr 15	Hr 16	Hr 17	Hr 18	Hr 19	Hr 20	Hr 21	Hr 22	Hr 23	Hr 24	
PPL HL							275	275	275	275	275	275	275	275	275	275	275	275	275	275	275	275	275	275	
PPL LL	150	150	150	150	150	150																	150	150	
CU4	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200
Judith GAP	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40
Basin Creek	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
QFs	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100
PP & L	0	0	0	0	0	0	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25
Credit Suisse	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25
Seattle Exchange						100																			
PP & L							50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50
Morgan Stanley							25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25
Total Resources	515	515	515	515	515	615	740	740	740	740	740	740	740	740	740	740	740	740	740	740	740	640	515	515	15,960
DS Load	566	564	568	569	631	762	850	850	845	826	823	798	789	781	777	784	803	837	866	861	805	708	627	590	17,880
(Short) / Long	(51)	(49)	(53)	(54)	(116)	(147)	(110)	(110)	(105)	(86)	(83)	(58)	(49)	(41)	(37)	(44)	(63)	(97)	(126)	(121)	(66)	(58)	(112)	(75)	(1,920)



Fixed Price Contracts
 April-11

	Hr 1	Hr 2	Hr 3	Hr 4	Hr 5	Hr 6	Hr 7	Hr 8	Hr 9	Hr 10	Hr 11	Hr 12	Hr 13	Hr 14	Hr 15	Hr 16	Hr 17	Hr 18	Hr 19	Hr 20	Hr 21	Hr 22	Hr 23	Hr 24
PPL HL						150	275	275	275	275	275	275	275	275	275	275	275	275	275	275	275	275	150	150
PPL LL	150	150	150	150	150	150																		
CU4	111	111	111	111	111	111	111	111	111	111	111	111	111	111	111	111	111	111	111	111	111	111	111	111
Judith GAP	47	47	47	47	47	47	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53	47	47
Basin Creek	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
QF's	96	96	96	96	96	96	96	96	96	96	96	96	96	96	96	96	96	96	96	96	96	96	96	96
PP & L	0	0	0	0	0	0	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	0	0
Credit Suisse	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25
Seattle Exchange						100																		
Powerex							70	70	70	70	70	70	70	70	70	70	70	70	70	70	70	70	70	70
Morgan Stanley							25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25
Energy Needed																								
Total Resources	429	429	429	429	429	529	680	680	680	680	680	680	680	680	680	680	680	680	680	680	680	580	429	429
DS Load	516	507	503	513	563	675	766	779	786	785	780	770	761	755	750	757	762	772	780	787	757	671	578	538
(Short) / Long	(87)	(78)	(74)	(84)	(134)	(146)	(86)	(99)	(106)	(105)	(100)	(90)	(81)	(75)	(70)	(77)	(82)	(92)	(100)	(107)	(77)	(91)	(149)	(109)



Fixed Price Contracts
 May-11

	Hr 1	Hr 2	Hr 3	Hr 4	Hr 5	Hr 6	Hr 7	Hr 8	Hr 9	Hr 10	Hr 11	Hr 12	Hr 13	Hr 14	Hr 15	Hr 16	Hr 17	Hr 18	Hr 19	Hr 20	Hr 21	Hr 22	Hr 23	Hr 24		
PPL HL							275	275	275	275	275	275	275	275	275	275	275	275	275	275	275	275	275	275		
PPL LL	150	150	150	150	150	150																	150	150		
CO4	167	167	167	167	167	167	167	167	167	167	167	167	167	167	167	167	167	167	167	167	167	167	167	167		
Judith GAP	38	38	38	38	38	38	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53	38	38		
Basin Creek	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
QFs	99	99	99	99	99	99	99	99	99	99	99	99	99	99	99	99	99	99	99	99	99	99	99	99		
PP & L	0	0	0	0	0	0	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	0	0		
Credit Suisse	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25		
Tiber	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5		
Seattle Exchange						100																(100)				
Turnbull Hydro	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4		
Energy Needed																										
Total Resources	488	488	488	488	488	588	653	653	653	653	653	653	653	653	653	653	653	653	653	653	653	653	553	488	488	14,352
DS Load	499	486	484	493	529	629	731	748	775	780	777	779	769	761	757	753	758	750	744	757	751	670	572	525	16,285	
(Short) / Long	(11)	2	4	(5)	(41)	(41)	(78)	(95)	(122)	(127)	(124)	(126)	(116)	(108)	(104)	(110)	(105)	(97)	(91)	(184)	(98)	(117)	(84)	(37)	(1,933)	



Fixed Price Contracts
 June-11

	Hr 1	Hr 2	Hr 3	Hr 4	Hr 5	Hr 6	Hr 7	Hr 8	Hr 9	Hr 10	Hr 11	Hr 12	Hr 13	Hr 14	Hr 15	Hr 16	Hr 17	Hr 18	Hr 19	Hr 20	Hr 21	Hr 22	Hr 23	Hr 24
PPL HL							275	275	275	275	275	275	275	275	275	275	275	275	275	275	275	275	275	275
PPL LL	150	150	150	150	150	150																	150	150
CU4	222	222	222	222	222	222	222	222	222	222	222	222	222	222	222	222	222	222	222	222	222	222	222	222
Judith GAP	36	36	36	36	36	36	39	39	39	39	39	39	39	39	39	39	39	39	39	39	39	39	39	36
Basin Creek	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
QF's	96	96	96	96	96	96	96	96	96	96	96	96	96	96	96	96	96	96	96	96	96	96	96	96
PP & L	0	0	0	0	0	0	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	0	0
Credit Suisse	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25
Seattle Exchange						100																	(100)	
Tiber	(7)	(7)	(7)	(7)	(7)	(7)	(7)	(7)	(7)	(7)	(7)	(7)	(7)	(7)	(7)	(7)	(7)	(7)	(7)	(7)	(7)	(7)	(7)	(7)
Turnbull Hydro	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10

Energy Needed

Total Resources	532	532	532	532	532	632	685	685	685	685	685	685	685	685	685	685	685	685	685	685	685	685	585	532	532	15,216
DS Load	520	506	503	508	535	633	737	791	827	846	851	855	852	847	846	847	826	805	789	791	777	712	608	555	555	17,367
(Short) / Long	12	26	29	24	(3)	(1)	(52)	(106)	(142)	(151)	(165)	(170)	(167)	(162)	(161)	(162)	(141)	(120)	(104)	(106)	(92)	(127)	(76)	(23)	(23)	(2,151)



NorthWestern Energy
Docket D2011.5.38
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-041)

Data Requests received August 23, 2011

MCC-41. RE: Administrative Expenses
Witness: Frank V. Bennett

Were any of the administrative expenses that are noted starting on line 20 of page FVB-11 for internal NorthWestern personnel?

RESPONSE:

No.