



September 6, 2012

Ms. Kate Whitney
Utility Division
Montana Public Service Commission
1701 Prospect Avenue
PO Box 2022601
Helena, Montana 59620-2601

**Re: Docket No. D2012.5.49 Electric Tracker
NorthWestern Energy's Updated Response to PSC Set 2 (006-013)
Data Requests PSC-006c and PSC-011**

Dear Ms. Whitney:

Enclosed for filing is a copy of NorthWestern Energy's updated response to PSC Set 2 (006-013) data requests PSC-006c and PSC-011. This set of data request responses has been mailed to the service list in this docket and hand delivered to the PSC and MCC. They have been efiled with the PSC.

Should you have questions please contact Joe Schwartzenberger at (406) 497-3362.

Sincerely,

Nedra Chase
Administrative Assistant

Enclosures

CERTIFICATE OF SERVICE

I hereby certify that a copy of NorthWestern Energy's updated responses to PSC-006c and PSC-011 in PSC Set 2 Data Requests (006-013) in Docket D2012.5.49 Electric Tracker has been served by mailing a copy thereof by first class mail, postage prepaid to the service list in this Docket and hand delivered to the PSC and MCC. These responses have also been efiled with the PSC.

Date: September 6, 2012



Nedra Chase
Administrative Assistant
Regulatory Affairs

A. Service List
D2012.5.49

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NorthWestern Energy
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Montana Public Service Commission (PSC)
Set 2 (006-013)

Data Requests received July 13, 2012

PSC-006

Regarding: Dave Gates Generation Station (DGGS) Outage
Witness: Cashell

- a. Please provide any off-line and on-line dates for each of the original power turbines at DGGS related to an outage during the tracker period.
- b. Please provide any on-line and off-line dates for each of the replacement turbines at DGGS related to an outage during the tracker period.
- c. Please provide any documentation NWE possesses, correspondence between NWE employees, or correspondence between NWE employees and others related to operational problems of DGGS before the outage occurred.
- d. Please provide any documentation NWE possesses, correspondence between NWE employees, or correspondence between NWE employees and others related to the cause of the DGGS outage, either before or after the outage.
- e. Please describe the steps NWE took to procure regulation service after the DGGS outage.

RESPONSE:

- a. See the attached list of outages for each of the three DGGS units during the tracker period.
- b. See the attachment provided in response to part a, above, for a record of the following sequence of events:
 - The Unit 1 outage began on January 31, 2012 and ended on March 31, 2012. The Unit 1A and 1B power turbines that have been operating since March 31 are both borrowed (replacement) turbines.
 - The Unit 2 outage began on January 12, 2012. On February 27, 2012 Unit 2 was put back into service with one borrowed power turbine (A) and one repaired original power turbine (B). On April 22, the borrowed Unit 2A power turbine failed and remains out of service, but the repaired Unit 2B continues to be available.
 - The Unit 3 outage began on January 31, 2012 and ended on April 24, 2012 when the original repaired power turbines 3A and 3B were reinstalled.

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- c. Some of the documentation and correspondence requested by this data request may be subject to the attorney/client privilege or the work product doctrine. NorthWestern objects to this data request to the extent that it requests any such documentation or correspondence. NorthWestern will provide a privilege log of any documents or correspondence, if any, that it withholds on the basis of attorney/client privilege or work product doctrine.

The documentation and correspondence that NWE possesses includes Facility Updates about DGGS that are issued multiple times daily plus related emails pertaining to those updates. NWE does not segregate the Facility Updates between those that report problems and those that report normal operations. Montana Rule of Civil Procedure (“M.R. Civ. P.”) 34(b)(2)(E)(i) allows NWE to produce documents as they are kept in the usual course of business. The Montana Public Service Commission (“Commission”) has adopted M.R. Civ. P. 34 as an administrative rule of the Commission. ARM 38.2.3301(1). Provided on the attached CD are all Facility Updates in NWE’s possession that were created between January 1, 2011, when DGGS achieved commercial operation, and January 31, 2012, when the outage began.

In addition to the Facility Updates, NWE possesses additional documentation and correspondence that is responsive to PSC-006c. An email search is under way and additional results will be provided as soon as they are available. The relevant period was determined to be January 1, 2011 through January 31, 2012. The search terms chosen were (Dave Gates Generating Station or DGGS or Mill Creek Generating Station or MCGS) **and** (problem or failure or repair or outage or bearings or inspection or teardown or blades or unavailable). The custodians chosen were Mike Cashell, Bill Rhoads, Jim Williams, John Hines, Bill Thompson, Casey Johnston, Mike McGowan, Mike Voeller, Mike Terry, Andrew McLain, Heather Grahame, and Al Brogan.

Pratt & Whitney Power Systems (“PWPS”) has informed NorthWestern that it considers technical information, including analyses, to be confidential and a trade secret. PWPS has further informed NorthWestern that it intends to file a petition to intervene and a motion for a protective order in this docket. NorthWestern is withholding information requested that may contain PWPS’s confidential data until the Commission issues a decision on the PWPS motion for a protective order.

- d. Some of the documentation and correspondence requested by this data request may be subject to the attorney/client privilege or the work product doctrine. NorthWestern objects to this data request to the extent that it requests any such documentation or correspondence. NorthWestern will provide a privilege log of any documents or

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correspondence, if any, that it withholds on the basis of attorney/client privilege or work product doctrine.

PWPS has informed NorthWestern that it considers technical information, including analyses, to be confidential and a trade secret. PWPS has further informed NorthWestern that it intends to file a petition to intervene and a motion for a protective order in this docket. NorthWestern is withholding information requested that may contain PWPS's confidential data until the Commission issues a decision on the PWPS motion for a protective order.

An email search is under way for documents responsive to this request. Results will be provided as soon as they are available. The relevant period was determined to be January 12, 2012 through August 8, 2012. The search terms chosen were (Dave Gates Generating Station or DGGS or Mill Creek Generating Station or MCGS) **and** (problem or failure or repair or outage or bearings or inspection or teardown or blades or turbine or unavailable) **and** (cause or root or borescope or vibration or cutaway or warranty or evaluation or damage or Pratt). The custodians chosen were Mike Cashell, Bill Rhoads, Jim Williams, John Hines, Bill Thompson, Casey Johnston, Mike McGowan, Donna Haeder, Mike Voeller, Mike Terry, Andrew McLain, Heather Grahame, and Al Brogan.

- e. Upon notification that the DGGS units would need to be taken offline and due to the emergency nature of the outage, NorthWestern contacted the three entities that had recently submitted bids in response to NWE's Request for Proposals ("RFP") for regulation service to be provided in 2013. NorthWestern identified the amount of regulating reserve immediately available and associated costs from each provider. In addition, NorthWestern discussed terms that would allow for gradually reducing the contracted regulation capacity and service provided as the DGGS units became operational. NorthWestern was able to procure regulation service and execute contracts with two of the three entities. The contract regulation was operational within 52 hours of the DGGS units being taken offline.

UPDATED RESPONSE (September 6, 2012):

- c. See the attached CD for additional documents responsive to this request. Attachments 36 through 39 contain emails and attachments, and Attachment 40 contains monthly DGGS reports from January 2011 through January 2012.

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PSC-011

Regarding: Electric Demand-Side Management (DSM) Program Spending
Witness: Thomas

- a. Please provide a detailed breakdown of spending, by bulb type and wattage, for the E+ Residential Lighting Program during the 2011-2012 tracker year.
- b. Please provide a detailed budget, by bulb type and wattage, for the E+ Residential Lighting Program during the 2012-2013 tracker year.
- c. Please provide a detailed breakdown of spending, by bulb type and wattage, for the E+ Commercial Lighting Program during the 2011-2012 tracker year.
- d. Please provide a detailed budget, by bulb type and wattage, for the E+ Commercial Lighting Program during the 2012-2013 tracker year.

RESPONSE:

- a. This data is available for the 9 months (July 2011 through March 2012) of the 2011-2012 tracker year and is presented below in Table 1: Residential Lighting Program Costs by Lamp Type and Wattage.

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PSC-011 cont'd

Table 1: Residential Lighting Program Costs by Lamp Type and Wattage

CFL Wattage	Lamp Count by Program						Residential Total		
	Residential Direct Install	Mail out	Mail In	In-store Coupon*	Buy-Down**	Give-Away Events	Lamps	Cost***	Cost/lamp
7W					20		20	\$28.30	\$1.43
9W					5028		5,028	\$7,187.45	\$1.43
10W					7476		7,476	\$10,686.36	\$1.43
11W			4		31171		31,175	\$44,672.87	\$1.43
12W					864		864	\$1,235.35	\$1.43
13W	2585	1953	263		54397	37,471	96,669	\$317,183.92	\$3.28
14W	741		40	72,904	47383		121,068	\$341,357.57	\$2.82
15W			38		87765		87,803	\$126,543.51	\$1.44
16W	1174				1813		2,987	\$18,802.81	\$6.29
18W			3		22401		22,404	\$32,107.13	\$1.43
19W			16		2145		2,161	\$3,522.68	\$1.63
20W			48		7391		7,439	\$11,936.32	\$1.60
21W					181		181	\$258.73	\$1.43
22W					164		164	\$233.93	\$1.43
23W	716		81		42250		43,047	\$72,596.51	\$1.69
25W					177		177	\$253.37	\$1.43
26W			29		27973		28,002	\$40,815.63	\$1.46
27W			4		819		823	\$1,284.46	\$1.56
30W					28		28	\$40.24	\$1.43
32W					810		810	\$1,157.87	\$1.43
39W			1				1	\$28.57	\$28.57
40W					209		209	\$298.04	\$1.43
42W					519		519	\$741.75	\$1.43
Total	5216	1953	527	72,904	340,982.2	37,471	459,053.2	\$1,032,973.38	\$2.25

*All lamps in the In-store Coupon program are assumed to be 14W.

**Lamp counts for the Buy-Down program are allocated rather than actual values.

***Cost include rebates paid and implementation. Within each program, implementation costs are assigned to wattage categories proportionally according to lamp counts.

- b. This information is not available. NorthWestern does not budget for future periods by bulb type and wattage because it has no way of knowing which types, sizes, or quantities of lamps will be purchased by its customers in the future.
- c. This data is available for the 9 months (July 2011 through March 2012) of the 2011-2012 tracker year and is presented below in Table 2: Commercial Lighting Program Costs by Lamp Type and Wattage.

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Table 2: Commercial Lighting Program Costs by Lamp Type and Wattage

Fixture Type	Wattage	Fixture Count by Program		Commercial Totals		
		Commercial Lighting Rebate	Commercial Direct Install	Fixtures	Cost*	Cost/fixture
CFL	9W	8		8	\$43.38	\$5.42
	10W	13		13	\$70.50	\$5.42
	13W	604	190	794	\$6,849.85	\$8.63
	14W	33	46	79	\$886.99	\$11.23
	15W	290		290	\$1,572.60	\$5.42
	16W		109	109	\$1,677.74	\$15.39
	18W	344		344	\$4,925.43	\$14.32
	20W	108		108	\$585.66	\$5.42
	21W	2		2	\$10.85	\$5.42
	23W	191	79	270	\$2,251.73	\$8.34
	25W	12		12	\$65.07	\$5.42
	26W	747		747	\$4,934.81	\$6.61
	27W	92		92	\$498.90	\$5.42
	30W	18		18	\$97.61	\$5.42
	32W	1		1	\$5.42	\$5.42
	35W	1		1	\$5.42	\$5.42
	40W	47		47	\$254.87	\$5.42
	42W	373		373	\$2,958.69	\$7.93
	50W	8		8	\$43.38	\$5.42
68W	18		18	\$97.61	\$5.42	
75W	2		2	\$10.85	\$5.42	
T5	14W	10		10	\$106.23	\$10.62
	24W	16		16	\$275.76	\$17.24
	28W	1762		1762	\$94,653.43	\$53.72
	49W	30		30	\$3,509.18	\$116.97
	51W	129		129	\$13,390.04	\$103.80
	54W	3087		3087	\$270,289.10	\$87.56
T8	17W	640		640	\$7,658.18	\$11.97
	25W	7193		7193	\$89,643.52	\$12.46
	28W	6970		6970	\$77,584.54	\$11.13
	30W	2		2	\$26.85	\$13.42
	32W	16155		16155	\$293,522.22	\$18.17
	44W	39		39	\$601.49	\$15.42
	56W	65		65	\$1,001.08	\$15.40
	59W	254		254	\$3,917.38	\$15.42
	86W	555		555	\$11,055.64	\$19.92
Controls		3081		3081	\$131,699.85	\$42.75
**Design		11		11	\$30,530.70	\$2,775.52
Fixture Removal		12		12	\$721.37	\$60.11
Induction		99		99	\$3,308.85	\$33.42
HID		111		111	\$6,075.23	\$54.73
LED		159		159	\$68,357.22	\$429.92
LED Exit Signs		285		285	\$5,250.49	\$18.42
Total		43,577	424	44,001	\$1,141,025.72	\$25.93

*Costs include rebates paid and implementation. Within each program, implementation costs are assigned to wattage categories proportionally based on number of fixtures.

** The "Design" category includes any High Efficiency Design projects and any that were rebated at \$0.10 per watt saved. The count in the fixture column is actually not fixtures, but number of projects. Fixtures in these projects are of various technologies and wattages.

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PSC-011 cont'd

d. See the response to part b, above.

UPDATED RESPONSE (September 6, 2012):

a. This data has been updated for the 12 months (July 2011 through June 2012) of the 2011-2012 tracker year and is presented below in Table 1: Residential Lighting Program Costs by Lamp Type and Wattage.

Table 1: Residential Lighting Program Costs by Lamp Type and Wattage

CFL Wattage	Lamp Count by Program						Residential Total		
	Residential Direct Install	Mail out	Mail In	In-store Coupon*	Buy-Down**	Give-Away Events	Lamps	Cost***	Cost/lamp
7W			10		24		34	\$352.55	\$10.29
9W					7,111		7,111	\$11,068.44	\$1.56
10W					10,085		10,085	\$15,699.34	\$1.56
11W			5		34,010		34,015	\$53,098.25	\$1.56
12W					1,096		1,096	\$1,705.91	\$1.56
13W	3453	3967	340		75,803	46,348	129,911	\$393,985.27	\$3.03
14W	996		83	119,137	64,260		184,476	\$566,818.39	\$3.07
15W	9		66		115,955		116,030	\$182,707.97	\$1.57
16W	1621				2,226		3,847	\$27,127.45	\$7.05
17W					414		414	\$644.45	\$1.56
18W			3		31,626		31,629	\$49,325.21	\$1.56
19W			16		3,195		3,211	\$5,477.75	\$1.71
20W			48		11,917		11,965	\$20,061.14	\$1.68
21W					210		210	\$327.59	\$1.56
22W					196		196	\$304.87	\$1.56
23W	1063		111		57,077		58,251	\$107,859.30	\$1.85
25W					192		192	\$299.26	\$1.56
26W			29		40,409		40,438	\$63,814.67	\$1.58
27W			4		819		823	\$1,400.18	\$1.70
30W					35		35	\$54.40	\$1.56
32W					1,017		1,017	\$1,582.55	\$1.56
39W			1				1	\$31.48	\$31.48
40W					272		272	\$423.72	\$1.56
42W					725		725	\$1,128.40	\$1.56
68W					36		36	\$55.26	\$1.56
Total	7,142	3,967	716	119,137	458,709	46,348	636,019	1,505,354	\$2.37

*All lamps in the In-store Coupon program are assumed to be 14W.

**Lamp counts for the Buy-Down program are allocated rather than actual values.

***Cost include rebates paid and implementation. Within each program, implementation costs are assigned to wattage categories proportionally according to lamp counts.

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- c. This data has been updated for the 12 months (July 2011 through March 2012) of the 2011-2012 tracker year and is presented below in Table 2: Commercial Lighting Program Costs by Lamp Type and Wattage.

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Table 2: Commercial Lighting Program Costs by Lamp Type and Wattage

Fixture Type	Wattage	Fixture Count by Program		Commercial Totals		
		Commercial	Commercial	Fixtures	Cost*	Cost/fixture
CFL	9W	8		8	\$51.36	\$6.42
	10W	13		13	\$83.46	\$6.42
	13W	868	294	1162	\$9,650.02	\$8.30
	14W	204	82	286	\$2,265.65	\$7.92
	15W	596		596	\$3,826.11	\$6.42
	16W	36	200	236	\$2,562.92	\$10.86
	18W	348		348	\$5,294.04	\$15.21
	20W	106		106	\$680.48	\$6.42
	21W	2		2	\$12.84	\$6.42
	23W	474	136	610	\$4,628.55	\$7.59
	25W	12		12	\$77.04	\$6.42
	26W	853		853	\$6,359.97	\$7.46
	27W	92		92	\$590.61	\$6.42
	30W	18		18	\$115.55	\$6.42
	32W	1		1	\$6.42	\$6.42
	35W	1		1	\$6.42	\$6.42
	40W	47		47	\$301.72	\$6.42
	42W	381		381	\$3,459.89	\$9.08
	50W	8		8	\$51.36	\$6.42
	67W	4		4	\$25.68	\$6.42
68W	18		18	\$115.55	\$6.42	
75W	2		2	\$12.84	\$6.42	
80W	3		3	\$19.26	\$6.42	
T5	14W	10		10	\$116.20	\$11.62
	17W	3		3	\$96.16	\$32.05
	24W	16		16	\$291.71	\$18.23
	25W	266		266	\$2,136.63	\$8.03
	28W	2094		2094	\$120,425.06	\$57.51
	49W	63		63	\$6,703.44	\$106.40
	50W	16		16	\$2,592.71	\$162.04
	51W	251		251	\$27,778.83	\$110.67
54W	3855		3855	\$346,421.77	\$89.86	
T8	17W	887		887	\$11,571.23	\$13.05
	25W	8352		8352	\$109,214.66	\$13.08
	28W	9077		9077	\$120,471.51	\$13.27
	30W	2		2	\$28.84	\$14.42
	32W	18526		18526	\$363,160.40	\$19.60
	44W	39		39	\$640.37	\$16.42
	56W	65		65	\$1,065.88	\$16.40
	59W	366		366	\$5,953.59	\$16.27
	86W	578		578	\$12,170.56	\$21.06
Controls		3901		3901	\$165,848.66	\$42.51
Design**		13		13	\$47,571.51	\$3,659.35
Fixture Removal***		25		25	\$3,562.64	\$144.80
Induction		99		99	\$3,407.55	\$34.42
HID		132		132	\$6,492.19	\$49.18
LED		563		563	\$113,771.27	\$202.08
LED Exit Signs		391		391	\$7,593.09	\$19.42
Total		53,685	712	54,384	\$1,519,304.00	\$27.93

*Costs include rebates paid and implementation. Within each program, implementation costs are assigned to wattage categories proportionally based on number of fixtures.

** The "Design" category includes any High Efficiency Design projects and any that were rebated at \$0.10 per watt saved. The count in the fixture column is actually not fixtures, but number of projects. Fixtures in these projects are of various technologies and wattages. The "cost/fixture" value is actually cost per project.

***The fixture count in the "Fixture Removal" category is not fixtures, but projects. The "cost/fixture" value is actually cost per project.