

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

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IN THE MATTER Of Northwestern Energy's) REGULATORY DIVISION
Application for: (1) Approval of Deferred Cost)
Account Balance for Electric Supply, CU4 Variable) DOCKET NO. D2012.5.49
Costs/Credits, and DGGS Variable Costs/Credits;)
and (2) Projected Electricity Supply Cost Rates,)
CU4 Variable Rates and DGGS Variable Rates)
_____)

DATA REQUESTS OF THE MONTANA CONSUMER COUNSEL

MCC-046 RE: Over-collected Lost Revenues
 Witness: William M. Thomas

You state in your testimony at page WMT-10, lines 12-14 that NWE proposes to credit the over-collected lost revenue amount, resulted from the SBW evaluation, in the 2013-2014 electric tracker. Please explain why customers should not receive the credit in this proceeding, 2012-2013 electric tracker.

MCC-047 RE: DSM Program Cost-effectiveness
 Witness: William M. Thomas

Please indicate the specific table or page in the SBW Evaluation (Exhibit__(MHB-1a)) where the levelized costs of DSM acquired during the five-year period from (1) the Program Administrator perspective (PAC) of \$0.011/kWh and (2) the Total Resource Cost perspective (TRC) of \$0.025/kWh are shown as stated in your testimony on page WMT-11, lines 1-6.

MCC-048 RE: Exhibit__(WMT-5)
 Witness: William M. Thomas

Please provide an electronic copy of Exhibit__(WMT-5), with all supporting worksheets, including those used in updating lost revenue amounts for Tracker 2006-07 through Tracker 2010-11.

MCC-049 RE: Exhibit__(WMT-3-S)
Witness: William M. Thomas

Please provide an electronic copy of Exhibit__(WMT-3-S), with all supporting worksheets.

MCC-050 RE: Exhibit__(WMT-3-S)
Witness: William M. Thomas

On page 6 of 21 of Exhibit__(WMT-3-S), a note states that 1.0 was used because the actual Net Adjusted Energy Savings from SBW were entered in Tab 3. Please provide the values of the Adjusted Energy Savings that would have been used in Tab 3, if the SBW's B-T-G factor of 0.89 were used.

MCC-051 RE: Exhibit__(WMT-5)
Witness: William M. Thomas

Please explain each difference between the updated DSM Lost Revenue amounts shown for Tracker 2009-10 and 2010-11 in Exhibit__(WMT-5) and those shown in Exhibit__(WMT-3-S), page 1 of 21.

MCC-052 RE: Deviation from Scheduled Load and Supply
Witness: Casey E. Johnston

Please provide a spreadsheet, in electronic format, of NWE BA operations showing (a) Interchanged Schedules, (b) actual tie line flow and (c) the associated imbalance for each hour in the last 12 months, as discussed in your testimony at page CEJ-4, lines 3-9.

MCC-053 RE: Deviation from Scheduled Load and Supply
Witness: Casey E. Johnston

Please provide a spreadsheet, in electronic format, showing (a) BA Area Control Error ("ACE") and (b) regulation services provided to NWE by David Gates Generating Station ("DGGs") for each hour in the last 12 months.

MCC-054 RE: Intra-Hour Schedule Adjustments
Witness: Casey E. Johnston

Please provide a spreadsheet, in electronic format, showing all 30-minute intra-hour schedule adjustments made by NWE for the month(s) when imbalances were at the highest during the last 12 months.

MCC-055 RE: NWE participation in I-TAP
Witness: Kevin J. Markovich

- (a) Please state whether NWE default supplier has participated in the intra-hour market during the tracker period 2011-2012 and/or if it is participating during the current tracker period.
- (b) If your answer to (a) is affirmative, please provide a table showing all transactions NWE has made in the intra-hour market, the quantity and cost of such transactions.
- (c) If NWE has participated in the intra-hour market, please provide a detailed table showing the extent to which such participation has reduced hourly imbalances.

MCC-056 RE: Use of Basin Creek for Intra-hour Scheduling
Witness: Kevin J. Markovich

In reference to your testimony at page KJM-6, lines 1-15:

- (a) Please explain in detail any mechanisms NWE has considered regarding the allocation of costs if Basin Creek were dispatched on an intra-hour basis for the benefit of the entire BA.
- (b) Please explain in detail whether the allocation mechanism used for regulation services from DGGs could apply to the allocation of Basin Creek costs to all customers.
- (c) If Basin Creek were dispatched on an intra-hour basis, please explain whether it would then not be considered as an NWE Energy Supply asset and its costs would not be properly included as part of the energy tracker.
- (d) If under intra-hour dispatch Basin Creek could still supply energy to regulated supply customers, how much capacity could be assigned to the energy tracker.

MCC-057 RE: Wind Integration
Witness: Kevin J. Markovich

In reference to your testimony at page KJM-7, lines 6-11, please state and explain the benefits that intra-hour scheduling will bring to wind forecasting.