

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 Approval to Purchase and )  
Operate PPL Montana's Hydroelectric Facilities, ) DOCKET NO. D2013.12.85  
for Approval of Inclusion of Generation Asset )  
Cost of Service in Electricity Supply Rates, for )  
Approval of Issuance of Securities to Complete )  
the Purchase, and for Related Relief )

**DATA REQUESTS OF THE MONTANA CONSUMER COUNSEL**

**MCC-001**

Regarding: Bid Development  
Witness: All Relevant Witnesses

Please explain in detail how NorthWestern's bid was developed.

**MCC-002**

Regarding: Bid Development  
Witness: All Relevant Witnesses

- a. Please provide a detailed explanation of how Northwestern's January 2013 non-conforming bid of \$740 million for the hydro assets only, was developed.
- b. Please provide a detailed explanation of how NorthWestern's January 2013 conforming bid of approximately \$400 million for the total package of assets including Colstrip 3, was developed.
- c. Please explain in detail the assumptions made about the costs, benefits and potential liabilities of non-hydro facilities that led to them having a net value of negative \$340 million to the package.
- d. Please provide a detailed comparison of each of those assumptions with the equivalent assumptions made in analyzing the value of Colstrip 4 to the utility when Northwestern asked the Commission to approve a price of approximately \$400 million for its purchase.

**MCC-003**

Regarding: Revenue Requirement  
Witness: DiFronzo/Meyer

- a. Please provide a year by year estimate of the revenue requirements of the utility with and without the purchase of the hydros, including a detailed explanation of all assumptions made about the alternative power purchases and their prices in the “without” case.
- b. Please provide an analysis of the effect of alternate assumptions in part a, above, on the date at which revenue requirements become lower in the “with” case than in the “without” case.

**MCC-004**

Regarding: Valuation  
Witness: All Relevant Witnesses

Does NWE believe that its owned interest in Colstrip Unit 4 has a negative value to the utility currently? Please explain in detail.

**MCC-005**

Regarding: Bill Impacts  
Witness: DiFronzo

Please provide a year by year estimate of the average residential customer bill for NWE resource procurement planning cycle with and without the purchase of the hydros, including a detailed explanation of any assumptions not already described in response to MCC-003.

**MCC-006**

Regarding: Due Diligence  
Witness: All Relevant Witnesses

Please provide all components of any due diligence analysis that was done by or for NWE regarding the acquisition of PPLM’s hydroelectric properties (and all exhibits and/or attachments thereto).

**MCC-007**

Regarding: Due Diligence  
Witness: All Relevant Witnesses

Please identify in detail all documents that were reviewed by NWE or its advisors in conjunction with any due diligence analysis of the hydroelectric property acquisition.

**MCC-008**

Regarding: Acquisition Analysis  
Witness: All Relevant Witnesses

Please provide copies of any NWE internal documents or advisory documents that criticized or questioned any aspects of the hydroelectric property acquisition.

**MCC-009**

Regarding: Acquisition Analysis  
Witness: All Relevant Witnesses

Please provide copies of all communications (and any attachments or documents related thereto) between PPLM (or any affiliate thereof) and NWE (or any affiliate or employee or advisor thereof) regarding NWE's potential acquisition of PPLM's hydroelectric properties.

**MCC-010**

Regarding: Acquisition Analysis  
Witness: All Relevant Witnesses

Please identify by date all meetings (in person or telephonic) that occurred between NWE (including employees or representatives thereof) and PPLM (or representatives or employees thereof) regarding any aspect of the potential hydroelectric property acquisition by NWE. Please identify the person or persons involved in those meetings and provide copies of all notes and other documents related to those meetings.

**MCC-011**

Regarding: Acquisition Analysis  
Witness: All Relevant Witnesses

Please provide copies of all communications (internal and external) concerning any aspect of NWE's potential acquisition of any generating properties from PPLM (or any affiliate thereof) other than the hydroelectric properties that are the subject of this filing.

**MCC-012**

Regarding: Valuation  
Witness: All Relevant Witnesses

Please provide in as much detail as possible a tabulation comparing (1) the original cost to Montana Power of the hydroelectric properties, (2) the value or sale price of the properties when they were sold to PPLM (3) any additions to original cost that you are aware of that were incurred by PPLM and (4) the value or sale price of the properties as proposed in this filing. Please provide each of these valuations including and excluding Kerr Dam.

**MCC-013**

Regarding: Exhibits  
Witness: Bird/Meyer/Stimatz/Kliewer

Please provide working electronic copies of all exhibits and work papers with all supporting files and links intact, for each of the following:

- a. Exhibit Nos. BBB-3, BBB-4 and BBB-5.
- b. Exhibit Nos. TEM-1 and TEM-2.
- c. Exhibit Nos. JMS-1, JMS-2 and JMS-3.
- d. Exhibit Nos. KGK-1, KGK-2 and KGK-3.

**MCC-014**

Regarding: Exhibits  
Witness: DiFronzo/Masud/Otto

Please provide working electronic copies of all exhibits and work papers with all supporting files and links intact, for each of the following:

- a. Exhibit Nos. PJD-1, PJD-2, PJD-3 and PJD-4.
- b. AM Exhibit 1 Public.
- c. Exhibit AO-02 Public.

**MCC-015**

Regarding: Workpapers  
Witness: Stimatz

Please provide working electronic copies of all calculations and related workpapers used to prepare the charts and tables that are presented in the body of the prefiled direct testimony of Joseph M. Stimatz.