

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-074**

Regarding: Model Inputs  
Witness: Travis E. Meyer/ Joseph M. Stimatz

Please provide a copy of PPL's Confidential Information Memorandum ("CIM") dated June 2013, used to develop several of the inputs of the LT Rev Req Model as stated in Mr. Meyer's testimony at page TEM-7 and Mr. Stimatz's testimony at page JMS-7.

**MCC-075**

Regarding: LT Rev Req Model Inputs  
Witness: Travis E. Meyer

In your testimony at page TEM-5 you state, "NorthWestern utilized several internal and external data points to arrive at the agreed-upon \$900 million purchase price in the acquisition of the Hydros." Please specify, describe and explain all of the internal and external data points to which you are referring.

**MCC-076**

Regarding: LT Rev Req Model Inputs  
Witness: Travis E. Meyer

Please provide a list of the expenses and capital inputs used in the DCF Analysis Model that were also used as inputs for your LT Rev Req Model.

**MCC-077**

Regarding: Operating Expenses  
Witness: Travis E. Meyer

The Schedule on page TEM-8 shows that the Fixed O&M Expense for 2014 is \$24.1 million and is based on the DCF Analysis Model. Please provide a detailed explanation on how the Fixed O&M Expense is calculated for each year, including the specific data used from the DCF Analysis Model and workpapers showing all calculations.

**MCC-078**

Regarding: Generation Capacity  
Witness: Travis E. Meyer

In your testimony at page TEM-9, lines 12-14 you state that the MWh of electricity that you used in your model are the same as those utilized in the DCF Analysis Model. Please provide more details on how the MWs and MWhs that you show in your model for 2014-2027 (lines 27 and 30 in Exhibit\_\_ (TEM-1)) were derived, including any specific references to the DCF Analysis Model or Mr. Stimatz's Exhibit\_\_(JMS-1).

**MCC-079**

Regarding: LT Rev Req Model Inputs  
Witness: Travis E. Meyer

Please explain in detail the meaning of the two options ("Regulated or Bullet" ) for the input Debt/Interest shown in Exhibit\_\_(TEM-1), line 13.

**MCC-080**

Regarding: Updated LT Rev Req Model (Exhibit\_\_(TEM-2))  
Witness: Travis E. Meyer

In your testimony starting at page TEM-15 you discuss differences between your Exhibit\_\_(TEM-1) and Mr. DiFronzo's Cost of Service (COS) Model. One of the differences is that the COS Model calculates revenue credits during the period October 1, 2014 through September 30, 2015 instead of calendar year 2014. Please provide a run of the LT Rev Req Model utilizing the same revenue credits as in Mr. DiFronzo's COS Model and all other inputs adjusted accordingly.

**MCC-081**

Regarding: Market Price Curve  
Witness: Travis E. Meyer

In your testimony starting at page TEM-18, lines 7-10 you state that the market price curve reflected in Exhibit\_\_(TEM-2) used the same basis adjustment as in the DCF Analysis Model, while the one used in Exhibit\_\_(TEM-1) uses a larger basis adjustment. Please provide for comparison purposes both market price curves and the basis used for each curve.

**MCC-082**

Regarding: DCF Analysis  
Witness: Joseph M Stimatz

In your testimony at page JMS-4, lines 9-10 you state that there was a model used that included analysis of other assets owned by PPLM. Please provide a copy of that model that includes analysis of other assets owned by PPLM in electronic format with all links intact, including all data and workpapers.

**MCC-083**

Regarding: Expected Generation  
Witness: Joseph M Stimatz

Please provide all data, calculations and workpapers in electronic format, with formulas intact of the generation estimates for the hydros you developed as mentioned in your testimony at page JMS-8, lines 20-22.

**MCC-084**

Regarding: PPLM's Forecast Revenues  
Witness: Joseph M Stimatz

In your testimony at page JMS-10, lines 5-15, you state that the PPLM forecast price used to calculate revenues was much higher than NWE's internal forecast, and PPLM's forecast results in a valuation about \$250 million higher than the valuation using NWE's estimates. Please state the date of the PPLM price forecasts and provide a copy of your analysis of this matter in electronic format with all links intact, including all data and workpapers.

**MCC-085**

Regarding: G&A Expenses  
Witness: Joseph M Stimatz

Please reconcile the amount of \$5,489,714 for After Tax G&A Expenses in 2014 shown in your Exhibit\_\_(JMS-1), line 35 with the higher amount of \$9.1 million in 2014 described in your testimony at page JMS-13, lines 6-15.

**MCC-086**

Regarding: Electricity Market Price Forecast  
Witness: Joseph M Stimatz

Please provide a more detailed explanation, in addition to NWE's recent experience, for the use of 30% to calibrate the calculated basis for NWE energy prices from the Mid-C price.

**MCC-087**

Regarding: NWE Supply Portfolio  
Witness: Joseph M Stimatz

In reference to the chart on page JMS-35 of your testimony (NWE Supply Portfolio With Hydro Facilities), please explain the reasons for NWE to go from a surplus of 49 MW in Q2 2017 to a deficit of 106 MW in the following quarter, Q3 2017.

**MCC-088**

Regarding: NWE Supply Portfolio  
Witness: Joseph M Stimatz

Please provide in electronic format the spreadsheets/models used in developing the comparison of the 30-Year Levelized Price for the alternatives shown in the table on page JMS-38 of your testimony. Please include all data, workpapers and spreadsheets with formulas and links intact.

**MCC-089**

Regarding: Other Evaluation of Hydros  
Witness: Joseph M Stimatz

Please provide copies of any reports or memorandums presented by Ascend Analytics showing their results and recommendation related to their evaluation of the addition of the Hydros to the supply portfolio as referenced in your testimony at page JMS-39, lines 4-9.

**MCC-090**

Regarding: Exhibit\_\_(PJD-1)  
Witness: Patrick J. DiFronzo

Please provide a detailed description of Gross Cash Requirements (line 25, Exhibit\_\_(PJD-1), page 1 of 12), including all data and workpapers showing the resulting amount of \$-10,339,304.

**MCC-091**

Regarding: Exhibit\_\_(PJD-2)  
Witness: Patrick J. DiFronzo

Exhibit\_\_(PJD-2), page 1 summarizes the estimated total electricity supply rates including the Hydros. Column D shows the Estimated Electric Supply Rates (excluding generation assets) for the period October 2014 thru September 2015 using Retail KWh sales for the period November 2013 thru October 2014. The same periods were used for the calculation of rates for Column R that shows the Hydro Assets' Fixed Rates. Variable Rates for the other generation assets (Colstrip IV, Dave Gates, and Spion Kop) are estimates for the period November 2013 thru October 2014 using Retail KWh for the same period. Please provide an exhibit using the same time period as for the other Variable Rates for the calculation of Column D, Electric Supply Rates (excluding generation assets).

**MCC-092**

Regarding: Exhibit\_\_(PJD-4)  
Witness: Patrick J. DiFronzo

Exhibit\_\_(PJD-4) shows the estimated bill impact to residential electric customers used during the evaluation process. Please provide in electronic format all spreadsheets, data and workpapers, in the same format as Exhibit\_\_(PJD-2) used to derive the Projected Rates for 2014, 2015 and 2016, without and with Mustang.

**MCC-093**

Regarding: Discounted Cash Flow Analyses  
Witness: Ahmad Masud

In your testimony at page AM-4, lines 7-10, you state that Credit Suisse performed Discounted Cash Flow Analyses to value the Hydros. Please provide a more detailed output of the results of those analyses and workpapers showing all inputs and assumptions that produced the results.

**MCC-094**

Regarding: Discounted Cash Flow Analysis  
Witness: Allen Otto

In your testimony at page AO-10, lines 4-10, you state that Blackstone conducted Discounted Cash Flow Analysis for the Montana Hydro Assets. Please provide a more detailed output of the results of those analyses and workpapers showing all inputs and assumptions that produced the results.