



March 3, 2014

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

RE: Docket No. D2013.12.85
PPLM Hydro Assets Purchase
PSC Set 3 Data Requests (059-066)
UPDATED RESPONSE TO PSC-066

Dear Ms. Whitney:

Enclosed for filing is a copy of NorthWestern Energy's updated response to PSC-066 in PSC Set 3 Data Requests. A hard copy will be mailed to the most recent service list in this Docket this date. The Montana Public Service Commission and the Montana Consumer Counsel will be served by hand delivery this date. This updated data response will also be e-filed on the PSC website and emailed to counsel of record.

Should you have questions please contact Joe Schwartzberger at 406 497-3362.

Sincerely,

Nedra Chase
Administrative Assistant
Regulatory Affairs

NC/nc
CC: Service List

CERTIFICATE OF SERVICE

I hereby certify that a complete copy of NorthWestern Energy's updated response to PSC-066 in PSC Set 3 Data Requests, in Docket D2013.12.85, the PPLM Hydro Assets Purchase, has been hand delivered to the Montana Public Service Commission and to the Montana Consumer Counsel this date. This updated data response will be e-filed on the PSC website and served on the most recent service list by mailing a copy thereof by first class mail, postage prepaid. This updated data response will also be emailed to counsel of record.

Date: March 3, 2014

A handwritten signature in blue ink that reads "Nedra Chase". The signature is written in a cursive style and is positioned above a horizontal line.

Nedra Chase
Administrative Assistant
Regulatory Affairs

**Docket No D2013.12.85
Hydro Assets Purchase
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NorthWestern Energy
Docket D2013.12.85
PPLM Hydro Assets Purchase

Public Service Commission (PSC)
Set 3 (059-066)

Data Requests served January 3, 2014

PSC-066

Regarding: Evaluating Other PPLM Assets
Witness: Stimatz

Please provide the version of your Exhibit_(JMS-1) that included analysis of other assets owned by PPLM referenced on JMS-4:9-10.

RESPONSE (January 24, 2014):

NorthWestern objects to this data request to the extent that it seeks information or documents not relevant to the issues in this docket, which is beyond the permissible scope of discovery. The scope of discovery is limited to non-privileged matters that are relevant. M. R. Civ. P. 26(b)(1). The information sought must be reasonably calculated to the discovery of admissible evidence. *Id.* Initially, the party responding to discovery must make a good faith determination of relevance. If the party responding is not permitted to determine the relevance of material and is required to produce all material so that the requesting party can determine relevance, the limitation that irrelevant information or documents are not discoverable is violated. Without waiving said objection, NorthWestern provides the following response.

See the file in the folder labeled "PSC-066" on the attached CD. The model alone is not reflective of the acquisition decision ultimately made by NorthWestern. In the end NorthWestern did not bid on the combined hydro and thermal assets. Many other factors and risks were analyzed by NorthWestern as described in the Prefiled Direct Testimony of Brian Bird, pages 3 through 21.

UPDATED RESPONSE (March 3, 2014):

By Notice of Commission Action dated February 20, 2014, the Commission overruled NorthWestern's objection to this data request.

Notwithstanding our objection or the Commission's subsequent response, NorthWestern confirms that the above response is a complete response to the data request.