

AL BROGAN  
NorthWestern Energy  
208 N. Montana Avenue, Suite 205  
Helena, Montana 59601  
Telephone (406) 443-8903  
Fax: (406) 443-8979  
al.brogan@northwestern.com

SARAH NORCOTT  
NorthWestern Energy  
208 N. Montana Avenue, Suite 205  
Helena, Montana 59601  
Telephone (406) 443-8996  
Fax (406) 443-8979  
sarah.norcott@northwestern.com

HEATHER H. GRAHAME  
NorthWestern Energy  
208 N. Montana Avenue, Suite 205  
Helena, Montana 59601  
Telephone (406) 443-8958  
Fax: (406) 443-8979  
heather.grahame@northwestern.com

Attorneys for NorthWestern Energy

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

IN THE MATTER OF NorthWestern	)	
Energy's Application for Approval to	)	
Purchase and Operate PPL Montana's	)	REGULATORY DIVISION
Hydroelectric Facilities, for Approval of	)	
Inclusion of Generation Asset and Cost of	)	
Service in Electricity Supply Rates, for	)	DOCKET NO. D2013.12.85
Approval of Issuance of Securities to	)	
Complete the Purchase, and for Related	)	
Relief	)	

**NORTHWESTERN ENERGY'S OBJECTIONS TO  
DATA REQUESTS MCC-202**

NorthWestern Corporation doing business as NorthWestern Energy (“NorthWestern”), objects to the data request identified as MCC-202 on the grounds more particularly described below. The Montana Consumer Counsel (“MCC”) served its seventh set of data requests (MCC-187 to MCC-202) (“MCC Set 7”) on February 21, 2014. Procedural Order 7323b, ¶ 9, provides that a party may object to a data request within 10 days from service. March 3, 2014 is 10 days from service of MCC Set 7.

### **MCC-202**

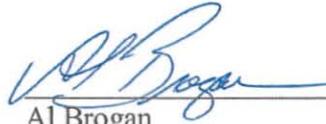
MCC-202 asks as follows:

Please provide the documents identified in the attachment “Requested PPL Data Room Documents.” If some of the documents listed have already been provided elsewhere, please state so and indicate where those documents may be found.

NorthWestern objects to Data Request MCC-202 to the extent that it: is overly broad and unreasonably vague, seeks information that is irrelevant, outside the reasonable scope of this proceeding, and not calculated to lead to the discovery of admissible evidence; imposes on NorthWestern undue expense or unreasonable burden; seeks information or documents relating to entities other than NorthWestern, including but not limited to the PPL Montana (“PPLM”) and its affiliates; purports to call for information or documents not presently in the possession of NorthWestern, but in the possession of third parties or separate legal entities; and requires public disclosure of information that is confidential or commercially sensitive trade secret information of PPLM and its affiliates. More specifically, at the request of NorthWestern, PPLM has been reviewing the requested documents and as to each document that is marked “Mixed” in the numbered index of the data room provided, and NorthWestern, working with PPLM, believes that the information requested as to the fossil units of PPLM is irrelevant as it is not information relevant to the acquisition of PPLM’s hydro assets by NorthWestern. In addition, data room

documents numbered 11.3.1.1, 11.3.1.2, and 11.3.2.1 through 11.3.2.9 are extremely large contracts that it would be burdensome for NorthWestern to produce, especially given the very limited, if any, relevance of these contracts to this proceeding.

Respectfully submitted this 3<sup>rd</sup> day of March 2014.



---

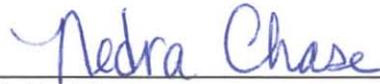
Al Brogan  
Sarah Norcott  
Heather H. Grahame

Attorneys for NorthWestern Energy

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of NorthWestern Energy's Objection to Data Request MCC-202 in MCC Set 7 in Docket No. D2013.12.85 has been hand delivered to The Montana Public Service Commission and The Montana Consumer Counsel. A copy has been e-filed on the MPSC website. This will be mailed to the most recent service list in this Docket by first class mail. This will also be emailed to the counsel of record.

Date: March 3, 2014



\_\_\_\_\_  
Nedra Chase  
Administrative Assistant  
Regulatory Affairs

**Docket No D2013.12.85**  
**Hydro Assets Purchase**  
**Service List**

Joe Schwartzberger  
NorthWestern Energy  
40 E Broadway  
Butte MT 59701

Patrick R Corcoran  
NorthWestern Energy  
40 E Broadway  
Butte MT 59701

Nedra Chase  
NorthWestern Energy  
40 E Broadway  
Butte MT 59701

Al Brogan  
NorthWestern Energy  
208 N Montana Ave Suite 205  
Helena MT 59601

Sarah Norcott  
NorthWestern Energy  
208 N Montana Ave Suite 205  
Helena MT 59601

Kate Whitney  
Montana Public Service Commission  
1701 Prospect Ave Box 202601  
Helena MT 59620-2601

Robert A Nelson  
Montana Consumer Counsel  
111 North Last Chance Gulch Ste1B  
Helena MT 59620-1703

John W Wilson  
J W Wilson & Associates  
1601 N Kent Ste 1104  
Arlington VA 22209

Albert E Clark  
2871 Conway Rd. 127  
Orlando FL 32812

Michael J Uda  
Uda Law Firm, P C  
601 S Montana Ave  
Helena MT 59601

Roger Kirk/Ben Singer  
Hydrodynamics Inc  
825 W. Rocky Creek Rd.  
Bozeman MT 59715

Joe Hovenkotter Gen Counsel  
Energy Keepers Inc  
110 Main Street Suite 304  
Polson MT 59860

Ranald McDonald  
CSKT Tribal Legal Dept  
P O Box 278  
Pablo MT 59855

Thorvald Nelson  
Holland & Hart LLP  
6380 South Fiddlers Green Circle  
Suite 500  
Greenwood Village CO 80111

Nikolas Stoffel  
Holland & Hart LLP  
6380 South Fiddlers Green Circle  
Suite 500  
Greenwood Village CO 80111

Charles Magraw  
501 8<sup>th</sup> Ave  
Helena MT 59601

Dr Thomas Power  
920 Evans  
Missoula MT 59801

Fred Szufnarowski  
Essex Partnership, LLC  
65 Main St. Suite 22  
Ivoryton, CT 06442