



April 11, 2014

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

RE: Docket D2013.12.85 – Hydro Asset Purchase
NorthWestern Energy (NWE) Data Requests to the Essex Partnership
(NWE-011-NWE-012)

Dear Ms. Whitney:

Enclosed for filing is one copy of NorthWestern Energy's (NWE) data requests to the Essex Partnership (NWE-011-NWE-012).

These data requests will be mailed by first class to the service list in this docket this date. They will be e-filed with the PSC, emailed to the counsel of record, and hard copies hand delivered to the PSC and MCC this afternoon.

If you have any questions, please call Joe Schwartzberger at (406) 497-3362.

Sincerely,

Nedra Chase
Administrative Assistant
Regulatory Affairs

NC/nc
Attachments
CC: Service List

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

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

**NORTHWESTERN ENERGY’S FIRST SET OF DATA REQUESTS
TO THE ESSEX PARTNERSHIP**

NWE-011

Regarding: Memorandum
Witness: Best witness

- a. In the Memorandum from The Essex Partnership to the Montana Public Service Commission dated April 2, 2014 (“Essex Memorandum”), on page 1, 3rd paragraph, the authors refer to replacement of certain components as “industry practice.” Describe the basis for this assertion.
- b. Provide every document in the possession, custody, or control of The Essex Partnership that supports the assertion that the referred to replacement is “industry practice.”
- c. In the Essex Memorandum on page 1, 4th paragraph, the authors refer to “Current practice, as accepted by FERC” with respect to a described installation. Provide every document in the possession, custody, or control of The Essex Partnership that supports the assertion that the “current practice” is required or accepted by FERC.
- d. In the Essex Memorandum on page 1, 4th paragraph, the authors refer to “Current practice,” as related to recommendations of a named institute. Provide a copy of the recommendations.
- e. In the attachment to the Essex Memorandum titled *Historic and Projected Capital Expenditures (\$1,000s)*, base capital expenditures were projected for four developments for 2021. Please provide The Essex Partnership’s projections of base capital expenditures for every development for each year from 2018 through 2022, explain, and document the projections.

NWE-012

Regarding: Due Diligence Analysis
Witness: Best Witness

Please provide copies of all communications; emails; and notes, records of conversations and meetings, or calls (and any attachments or documents related thereto) between The Essex Partnership (or representative, employee, principal, or agent thereof) and the Montana Public Service Commission (or any commissioner, representative, agent, employee, or consultant thereof) between September 26, 2013 and the present regarding any aspect of NorthWestern's evaluation of, purchase of, or Application for Approval of the Hydros.

CERTIFICATE OF SERVICE

I hereby certify that a copy of NorthWestern Energy's first set of Data Requests to the Essex Partnership (NWE-011-NWE-012) 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. They 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 and will also be emailed to counsel of record.

Date: April 11, 2014



Nedra Chase
Administrative Assistant
Regulatory Affairs

Docket No D2013.12.85
Hydro Assets Purchase
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