

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 TO
NORTHWESTERN ENERGY**

MCC-209

Regarding: Interconnected Transmission System
Witness: William T. Rhoades

On page WTR-14 of your Additional Issues testimony in this docket, you state that a pole line from the Mystic Plant to the point of interconnection, as well as another parallel pole, may be reconducted in the next 5-20 years, and their costs have been included in the 20-year CapEx budget. Please direct to the specific Exhibit that shows these CapEx budgeted expenses and indicate the year and the specific amount of each expense.

MCC-210

Regarding: Major Investment Upgrades
Witness: John C. Vandaveer

On page JCV-5 of your Additional Issues testimony in this docket, you state "...the 20-year plan included the remaining major investment upgrades needed on the system that had not been addressed in the PPLM CapEx investments prior to 2013 and specifically planned from 2013 through 2017." Please provide a list of those major investment upgrades, including the year and the amount of the expense for each upgrade.

MCC-211

Regarding: Major Investment Upgrades
Witness: John C. Vandaveer

On page JCV-8 of your Additional Issues testimony, you state “NorthWestern conducted capital expenditure sensitivity analyses to illustrate the effect of potential variances to CapEx expenses.” Please provide a description of each of the sensitivity analyses that NWE performed and explain why it decided that the two scenarios where CapEx increased by 30% and decreased by 15% were the most representative of the potential variance of CapEx expenses.

MCC-212

Regarding: Kerr Transfer
Witness: Mary Gail Sullivan

On page MGS-10 and MGS-11 of your Additional Issues testimony in this docket, you state that if Kerr does not transfer, it is expected the Fish and Wildlife Implementation Strategy ("FWIS") payment to CSKT would need to continue. Is this payment included in the \$4.5 million 2013 baseline table shown on page MGS-4 of your testimony; if so please indicate within which of the listed items it is included.

MCC-213

Regarding: Superfund Issues
Witness: Mary Gail Sullivan

On page MGS-11 of your Additional Issues testimony in this docket, you state that the cost associated with the Anaconda Copper Mining Company ("ACM") Smelter and Refinery Superfund site will be allocated among the responsible parties. You also state on page MGS-12 that “if NorthWestern was named as a potentially liable party, it would have a strong case to shift the costs to the companies that owned and operated the facility from which the pollutants were released and/or that insurance may be available for such costs.” However, the Anaconda Copper Mining Company has gone out of business. Please identify the responsible parties who owned and operated the facility from which the pollutants were released and who will be allocated these costs. Also, please provide the names of parties and the percentage share of liability for each. If specific percentages are not known, please provide best information available to you. Also, please identify the specific insurance coverage that you are referring to.

MCC-214

Regarding: 20-year CapEx forecast.
Witness: Rick Miller

Please provide, in electronic format with formulas intact, the 20-year capital expenditure ("CapEx") forecast, developed by HDR, as stated in your Additional Issues testimony at page RM-6. Also, please provide for each of the assets the specific CapEx projects and the unspecified allocation of CapEx investments per year as stated on page RM-8 of your testimony, including all supporting documents, data and worksheets.

MCC-215

Regarding: Stochastic Modeling Results.
Witness: Joseph M. Stimatz

Please provide, in electronic format with formulas intact, the data and workpapers used in preparing the tables shown on page JMS-2, "Stochastic Modeling Results (\$Billions)" for the scenarios 30% increase and 15% decrease in capital expenditures each year.

MCC-216

Regarding: Stochastic Modeling Results.
Witness: Joseph M. Stimatz

In reference to the tables shown on page JMS-2, "Stochastic Modeling Results (\$Billions)" for the scenarios 30% increase and 15% decrease in capital expenditures each year, please provide, in electronic format, a chart similar to the one shown on page JMS-4 of your supplemental direct testimony, dated February 2014. Also, please provide all supporting data, spreadsheets and workpapers.