

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 HUMAN RESOURCE COUNCIL, DISTRICT XI
NATURAL RESOURCE DEFENSE COUNCIL**

MCC-226

Regarding: Historical Power and Natural Gas Prices
Witness: Thomas Michael Power

Dr. Power's response testimony contains a graph of daily Mid-C power and Sumas natural gas prices from 2000 through 2010, the source of which is said to be a "Puget Sound Energy 2013 Integrated Resource Plan, Appendix K, Figure K-5, Page K-13." See page 4 of Dr. Power's response testimony. Please provide a copy of the complete Puget Sound Energy 2013 Integrated Resource Plan, including all Appendices.

MCC-227

Regarding: Historical Power and Natural Gas Prices
Witness: Thomas Michael Power

With respect to the graph presented at page 4 of Dr. Power's response testimony:

- a) Please describe in more detail the Mid-C power prices presented in that graph, e.g., are they the single highest price on each day, the simple average on-peak price each day, the volume-weighted average on-peak price each day, the simple average of all prices each day, the volume-weighted average of all prices on each day, or some other price.

- b) Please describe in more detail the Sumas natural gas prices presented in that graph, e.g., are they the single highest price on each day, the simple average on-peak price each day, the volume-weighted average on-peak price each day, the simple average of all prices each day, the volume-weighted average of all prices on each day, or some other price.

MCC-228

Regarding: Historical Mid-C Power Prices
Witness: Thomas Michael Power

With respect to the graph presented at page 4 of Dr. Power's response testimony:

- a) That graph describes historical Mid-C power prices from 2000 through 2010. Has Dr. Power reviewed, analyzed, or studied historical Mid-C power prices for periods after 2010?
- b) If so, please provide copies of all documents relating to any such reviews, analyses, or studies.
- c) Please describe the opinions reached by Dr. Power resulting from his reviews, analyses, or studies relating to the documents being provided in response to b) above.
- d) If there are no documents responsive to b) above, please describe the opinions reached by Dr. Power from his reviews, analyses, or studies of historical Mid-C power prices for periods after 2010.

MCC-229

Regarding: Historical Sumas Natural Gas Prices
Witness: Thomas Michael Power

With respect to the graph presented at page 4 of Dr. Power's response testimony:

- a) That graph describes historical Sumas natural gas prices from 2000 through 2010. Has Dr. Power reviewed, analyzed, or studied historical natural gas prices for periods after 2010?
- b) If so, please provide copies of all documents relating to any such reviews, analyses, or studies.

- c) Please describe the opinions reached by Dr. Power resulting from his reviews, analyses, or studies relating to the documents being provided in response to b) above.
- d) If there are no documents responsive to b) above, please describe the opinions reached by Dr. Power from his reviews, analyses, or studies of historical Sumas natural gas prices for periods after 2010.

MCC-230

Regarding: Historical Mid-C Prices
Witness: Thomas Michael Power

With respect to the graph presented at page 4 of Dr. Power's response testimony:

- a) Does Dr. Power agree that the price spikes shown there in late 2000 to early 2001 were due to the California energy crisis?
- b) For periods after 2008, does Dr. Power agree that each upward Mid-C power price spike lasted only for a short period of time, and was then followed quickly by price declines? If not, please identify periods after 2008 when an upward Mid-C power price spike was followed by periods in which prices remained at or relatively near the price spike level for extended periods of time.
- c) Does Dr. Power agree that Mid-C power prices have been less volatile from 2009 through the present than they were during 2002 through 2008?
- d) Does Dr. Power agree that Mid-C power prices have been lower in most months from 2009 through the present than they were in most months during 2002 through 2008?

MCC-231

Regarding: Historical Sumas Natural Gas Prices
Witness: Thomas Michael Power

With respect to the graph presented at page 4 of Dr. Power's response testimony:

- a) Does Dr. Power agree that the price spikes shown there in late 2000 to early 2001 were due to the California energy crisis?

- b) For periods after 2008, does Dr. Power agree that each upward Sumas natural gas price spike lasted only for a short period of time, and was then followed quickly by price declines? If not, please identify periods after 2008 when an upward Sumas natural gas price spike was followed by periods in which prices remained at or relatively near the price spike level for extended periods of time.
- c) Does Dr. Power agree that Sumas natural gas prices have been less volatile from 2009 through the present than they were during 2002 through 2008?
- d) Does Dr. Power agree that Sumas natural gas prices have been lower in most months from 2009 through the present than they were in most months during 2002 through 2008?