

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

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IN THE MATTER OF NorthWestern) REGULATORY DIVISION
Energy's 2012-2013 Electricity)
Supply Tracker) DOCKET NO. D2013.5.33
)
IN THE MATTER OF NorthWestern) DOCKET NO. D2014.5.46
Energy's 2013-2014 Electricity)
Supply Tracker)

**DATA REQUESTS OF THE MONTANA CONSUMER COUNSEL
TO NORTHWESTERN ENERGY**

MCC-001 Regarding: 2012/2013 Tracker Period Activities
Witness: Kevin J. Markovich

In reference to your 2013 testimony filed in this docket at pages KJM-6 and KJM-7, you mention an RFP for Community Renewable Energy Projects ("CREP") that was issued during the 2012/2013 tracker period and any updates thereto. Please provide copies of the RFP and copies of all responses, including bids received. If bids cannot be provided, please explain why they cannot be provided and provide details about supplier names, products and terms of the received bids, as well as the current stage of the evaluation process.

MCC-002 Regarding: Renewable Portfolio Standard
Witness: Kevin J. Markovich

In reference to your 2013 testimony filed in this docket, please provide a list of all the eligible CREP contracts NWE has entered into since 2011, including the capacity, terms and supplier for each of the contracts.

MCC-003 Regarding: NWE's Supply Portfolio
Witness: Kevin J. Markovich

In your 2013 testimony filed in this docket at page KJM-11, lines 9-13 you state that favorable market conditions have resulted in attractive pricing for short-term purchases. Would the current market conditions also be favorable to long term purchases or for 5-7 year purchase contracts? If not, please explain your answer fully.

MCC-004 Regarding: NWE's Supply Portfolio
Witness: Kevin J. Markovich/Frank V. Bennett

Please provide a list of all off-system fixed price purchases NWE made during the last four tracker periods (2010/11, 2011/12, 2012/13 and 2013/2014), stating the name of the supplier, the month(s) of the purchases, monthly quantities in MWs, average price paid each month, and period of the contract.

MCC-005 Regarding: NWE's Supply Portfolio
Witness: Kevin J. Markovich/Frank V. Bennett

For each purchase identified and included in your response to MCC-4 above, please provide a list of all related off-system sales at market prices NWE made during the last four tracker periods (2010/11, 2011/12, 2012/13 and 2013/2014), stating the name of the purchaser, the month(s) of the sales, monthly quantities in MWs, average market price(s) received each month, and period of the contract.

MCC-006 Regarding: NWE's Supply Portfolio
Witness: Kevin J. Markovich/Frank V. Bennett

Please provide a list of all off-system fixed price sales NWE made during the last four tracker periods (2010/11, 2011/12, 2012/13 and 2013/2014), stating the name of the purchaser, the month(s) of the sales, monthly quantities in MWs, average price received each month, and period of the contract.

MCC-007 Regarding: NWE's Supply Portfolio
Witness: Kevin J. Markovich/Frank V. Bennett

For each purchase identified and included in your response to MCC-6 above, please provide a list of all related off-system purchases at market prices NWE made during the last four tracker periods (2010/11, 2011/12, 2012/13 and

2013/2014), stating the name of the seller, the month(s) of the purchases, monthly quantities in MWhs, average price paid each month, and period of the contract.

MCC-008 Regarding: PPL-7 Year Contract Expiration
Witness: Kevin J. Markovich

In your 2013 testimony filed in this docket at page KJM-13, lines 11-13, you state that market prices are 25-30% lower than those in the current PPL contract. In Mr. Bennett's Exhibit___ (FVB-1)12-13 Updated, he shows that the average PPL price in 2012-13 was \$52.67/Mwh. Please provide the basis for your comparison and also indicate whether you are referring to an average of the off-system transaction prices shown in Mr. Bennett's Exhibit___ (FVB-1)12-13 Updated, page 5 of 5. Also, please provide details (e.g., price, quantity, time period, etc.) for those off-system transactions.

MCC-009 Regarding: PPL-7 Year Contract Expiration
Witness: Kevin J. Markovich

In your 2013 testimony filed in this docket at page KJM-14, lines 7-9, you state: "NWE's market knowledge, risk management, and contracting capabilities have expanded, allowing the Company to separate the physical procurement from the hedging aspect." Please provide a detailed explanation of how NWE's market knowledge, risk management and contracting capabilities have expanded and provide specific examples of how each of these changes has permitted the Company to separate physical procurement from hedging.

MCC-010 Regarding: PPL-7 Year Contract Expiration
Witness: Kevin J. Markovich

In reference to the steps NWE has taken in anticipation of the PPL contract expiration, as stated in your 2013 testimony filed in this docket at page KJM-15, please provide a detail update regarding the initiated fixed-price energy purchases at Mid C for Quarter 3 and Quarter 4 2014, including the name of each supplier, purchase price, quantity and time period of each purchase.

MCC-011 Regarding: 2012/2013 Tracker Period Activities
Witness: Kevin J. Markovich

In your 2013 testimony filed in this docket, at page KJM-16, lines 1-5, you state that the 2012/2013 tracker period contained no material operation changes or issues that caused supply service to change from the previous tracker period. How would you describe the impact on supply service resulting from the outage of Colstrip Unit 4 for several months? Also, please explain in detail what steps NorthWestern took to minimize the cost to its default supplier ratepayers as a result of this outage.

MCC-012 Regarding: Colstrip Unit 4 Outage
Witness: Kevin J. Markovich

Colstrip Unit 4 was reported to be offline for scheduled maintenance during the months of May and June 2013. Please provide a list of all power purchases that were intended to replace power not supplied by Colstrip Unit 4 during the scheduled maintenance, stating name of supplier, amount, period, dates that power was contracted and price.

MCC-013 Regarding: Colstrip Unit 4 Outage
Witness: Kevin J. Markovich

Please specify the amounts of replacement power NWE acquired during each month of the Colstrip Unit 4 scheduled maintenance through term contracts and through spot market purchases, stating for each such purchase the name of the seller, the month of purchase, the MWhs purchased, and the average price paid each month.

MCC-014 Regarding: Colstrip Unit 4 Outage
Witness: Kevin J. Markovich

Please provide all operation logs for Colstrip Unit 4 from the time the scheduled maintenance was completed to the time the Unit was tripped off and became offline.

MCC-015 Regarding: Colstrip Unit 4 Outage
Witness: Kevin J. Markovich

Please provide all memos, correspondence, and any documentation within NWE possession and/or control in relation to the outage, from the day the outage occurred to the present, including all communications concerning the outage between NWE and PPLM, any and all communications with the company that performed the scheduled maintenance, and any communications with any insurance companies regardless of whom such company was insuring

MCC-016 Regarding: Colstrip Unit 4 Outage
Witness: Kevin J. Markovich

Please provide all communications, memos and any documentation where NWE requested from PPL (as the operator of CU4) an explanation of the outage (and PPL's responses thereto) and any communications regarding the cost implications of the outage. Also, please provide all communications or notes or documents related to or memorializing communications between NWE and PPLM regarding the evaluation of the outage and the responsibility for cost recovery.

MCC-017 Regarding: Colstrip Unit 4 Outage
Witness: Kevin J. Markovich

Please provide all memos, correspondence, and any documentation NWE possesses or has obtained in relation to property damage insurance payments PPL has received or expects to receive, and the amount of the deductible, if any, for claims related to CU4 outage. Also please indicate what share of any deductible NWE is asked to pay.

MCC-018 Regarding: Colstrip Unit 4 Outage
Witness: Kevin J. Markovich

Please provide all NWE internal memos, correspondence, and any documentation discussing the evaluation of the outage, including the alternatives to minimize the cost to ratepayers, the potential recovery of costs from PPLM, or any possible litigation or alternative actions NWE could pursue against PPLM for cost recovery.

MCC-019 Regarding: Colstrip Unit 4 Outage
Witness: Kevin J. Markovich

Please provide a copy of the operation agreement between NorthWestern and PPLM as the operator of CU4.

MCC-020 Regarding: Colstrip Unit 4 Outage
Witness: Kevin J. Markovich

Please provide copies of all assessments of costs of the Colstrip Unit 4 outage, including total cost of repairs and NWE share of the costs of repairs, cost of replacement power, and Mwh not supplied to NWE's customers.

MCC-021 Regarding: Colstrip Unit 4 Outage
Witness: Kevin J. Markovich

Please describe to NWE's best knowledge what practices other owners of CU4 have followed in order to recover the cost of the outage and provide any correspondence, evaluations performed by others that are in NWE's possession.

MCC-022 Regarding: Colstrip Unit 4 Outage
Witness: Kevin J. Markovich

Out of the 222 MW that Colstrip Unit 4 scheduled to supply default customers, please provide a quantification of the Mwh needed by NWE, on a daily basis for each month of the outage.

MCC-023 Regarding: Colstrip Unit 4 Outage
Witness: Kevin J. Markovich

Please describe all efforts that NorthWestern pursued to acquire the lowest cost replacement power during the time that Colstrip IV would be offline. Please provide detailed descriptions and supporting documents of all efforts NorthWestern undertook to assure that replacement power would be acquired at least cost.

MCC-024 Regarding: Colstrip Unit 4 Outage
Witness: Kevin J. Markovich

Please provide a copy of the supply arrangements between NWE and owners of other units at Colstrip that limit the impact of the outage.

MCC-025 Regarding: Colstrip Unit 4 Outage
Witness: Kevin J. Markovich

Please provide a schedule showing all short-term purchases from July 1, 2013 to the last day of the outage, indicating whether the purchases are replacement power due to Colstrip Unit 4 outage or normal short-term/tracker default supply purchases unrelated to the CU4 outage.

MCC-026 Regarding: Colstrip Unit 4 Outage
Witness: Kevin J. Markovich

Please specify the coverage of any property damage insurance that applies to the outage at Colstrip Unit 4. Please provide all documents relating to any efforts NWE made to seek coverage pertaining in any way to the outage.

MCC-027 Regarding: Colstrip Unit 4 Outage
Witness: Kevin J. Markovich

Please provide all memos, correspondence, and any documentation NWE possesses or has obtained in relation to insurance purchased by PPLM, as operator of CU4, regarding coverage of an event such as the outage.

MCC-028 Regarding: 2012/2013 Tracker Period Activities
Witness: Kevin J. Markovich

In your 2013 testimony filed in this docket at page KJM-16, lines 7-8, you state that through the flexibility provided by the Hedging Strategy, NWE has been able to take advantage of this [low market prices] by procuring more energy in the day-ahead and hourly markets. Please define specifically and in detail what is meant by the “flexibility provided by the Hedging Strategy.” Also, please provide a summary table of the unit prices and monthly quantities during the 2012/2013 tracker period that support your statement.

MCC-029 Regarding: 2012/2013 Tracker Period Activities
Witness: Kevin J. Markovich

In your 2013 testimony filed in this docket at page KJM-17, you state that NWE procured an additional 25 MW of index-priced, on-system energy for the period of December 2012 through May 2014. Please provide detailed information about the supplier of this 25 MW and the monthly contract index-prices and quantities procured.

MCC-030 Regarding: USB Budget and Spending
Witness: William M. Thomas

Please provide a table showing the nine years Annual Budget and Expenditures for USB Programs.

MCC-031 Regarding: Reported Electric Savings from 2012/13
Witness: William M. Thomas

Please provide more details of all instances where reported energy savings are not based on engineering calculations but on average energy savings per DSM measure (deemed savings), and also provide for each program the value of deemed savings assigned and the procedure and basis used in these estimations.

MCC-032 Regarding: Residential and Commercial Electric Savings
Witness: William M. Thomas

Please explain in detail how the percentage split between each of the residential and commercial DSM resources that were acquired in the 2012-2013 Program Year, as shown on Table B of Exhibit__(_WMT-1) Updated provided with your 2013 testimony, have been estimated. Please provide all supporting documents, work papers and calculations.

MCC-033 Regarding: E+ Lighting Programs
Witness: William M. Thomas

In your 2013 testimony filed in this docket at pages WMT-9-11 you discuss new federal regulations relating to energy efficiency standards for lighting technologies and how incandescent lighting products will be phased out. (a) What percentage of customers purchasing new lighting products in 2014 do you estimate would buy incandescent bulbs instead of CFLs without being persuaded to do so through NorthWestern E+ Lighting Rebate? (b) As the need to persuade customers to buy CFL phases out, would it be appropriate to phase out/reduce investment in the E+ Lighting Rebate program? Explain your answer.

MCC-034 Regarding: E+ Commercial DSM Programs
Witness: William M. Thomas

In your 2013 testimony filed in this docket at page WMT-13-14 you list the five firms working to acquire commercial sector DSM and the respective number of projects they have completed or expected to be completed during the 2012-13 tracker period. Please provide for each of the firms, the names of each of these projects.

MCC-035 Regarding: Northwest Energy Efficiency Alliance (NEEA)
Witness: William M. Thomas

In your 2013 testimony filed in this docket at page WMT-14 you state that energy savings from NEEA activities total 0.38 a MW during the 2012-13 tracker period. Please provide a detailed explanation on how this 0.38 a MW savings were calculated, including all supporting documents and work papers.

MCC-036 Regarding: 2013-2014 Modifications to DSM Programs
Witness: William M. Thomas

In your 2013 testimony filed in this docket at pages WMT-25-26 you discuss adjustments that NorthWestern has made or is in the process of making to its DSM Programs. In reference to the use of SBW-derived deemed energy savings, please provide a list of all prescriptive rebates measures and programs that were adjusted by using the SBW-derived deemed energy savings, indicating the new value and the previous value, and the reason why NorthWestern believes that the new value better reflects actual savings.

MCC-037 Regarding: DSM Activities
Witness: William M. Thomas

- a) Do you agree that nowadays Energy Savings products are widely promoted and customers are being more conscious about their choices to purchase or to make energy saving improvements in their homes? If not, explain your answer.
- b) When NWE estimates future demand, does NWE take into account the reduction of energy demand that is due to the changes in the behavior of customers over time that is not caused by the Company's DSM programs? Please fully explain your answer.

MCC-038 Regarding: 2012/2013 Off-System Transactions
Witness: Frank V. Bennett

Please provide all supporting documents, workpapers and calculations for the Off System Transactions: Fixed Price totaling \$43,722,602 and Index Price totaling \$23,833,009, during the 2012/2013 default supply tracking period, as shown on your 2013 testimony in this docket, indicating quantity, price, month, and name of counter party for each sale and purchase.

MCC-039 Regarding: 2012/2013 On-System Transactions
Witness: Frank V. Bennett

Please provide all supporting documents, workpapers and calculations for the On System Transactions: Base Fixed Price totaling \$145,446,374 and Index Price totaling \$26,876,349, during the 2012/2013 default supply tracking period, as shown on your 2013 testimony in this docket, indicating quantity, price, month, and name of resource or counter party for each sale and purchase.

MCC-040 Regarding: 2012/2013 Administrative Expense
Witness: Frank V. Bennett

Please provide all documents supporting the \$1,622,940 in Administrative Expenses as shown on page 1 of Exhibit__(FVB-1)12-13 Updated, line 43.

MCC-041 Regarding: 2012/2013 Colstrip IV
Witness: Frank V. Bennett

During the months of May and June 2013, Colstrip IV delivered about 30% less than other months. Does the output for these months take into account the scheduled maintenance that took place in May and June 2013? Also, please explain in detail how the output in these two months is calculated, and provide all the data, and supporting workpapers for this calculation.

MCC-042 Regarding: 2012/2013 DGGS
Witness: Frank V. Bennett

Please explain in detail the reasons why the actual output in February 2013 for DGGS was 29,580 Mwh, while during the other months it was between 5,040 and 5,208 Mwh (the equivalent to 7 Mw per month assigned to default supply), as shown on Exhibit__(FVB-1)12-13 Updated, page 3 of 5.

MCC-043 Regarding: 2012/2013 Spion Kop
Witness: Frank V. Bennett

Please explain in detail the reasons why the actual output for Spion Kop in May and June is considerably less (around 40% lower) than in the previous months.

MCC-044 Regarding: 2012/2013 On-System Transactions
Witness: Frank V. Bennett

- a) In reference to your Exhibit__(FVB-1)12-13 Updated, page 3 of 5, please provide the list of providers (and quantities for each) included in Other non-QF and Competitive Solicitations.
- b) Mr. Markovich shows in his 2013 testimony in this docket at page KJM-9 a list of new electric supply resources added to NWE's portfolio; please identify for each of the new resources where they are included under On System Transactions (or elsewhere if applicable) in Exhibit__(FVB-1)12-13 Updated, page 3 of 5.

MCC-045 Regarding: 2012/2013 Basin Creek
Witness: Frank V. Bennett

Please explain in detail the reasons why Basin Creek output for the 2012/2013 tracker period was only 26,234 Mwh in contrast with the expected output of 30.684 Mwh as indicated in the previous tracker filing (Docket D2012.5.49).

MCC-046 Regarding: 2012/2013 Basin Creek Fixed Costs
Witness: Frank V. Bennett

Please explain in detail the reasons why the fixed costs of Basin Creek in November 2012 and the costs for May 2013 are much higher than the costs in the other months.

MCC-047 Regarding: 2012/2013 Transmission Cost
Witness: Frank V. Bennett

Please provide all documents and calculations supporting the transmission cost of \$735,776 for the 2012/2013 default supply tracking period. Also, please explain in detail why this cost is more than triple what it was forecasted to be in the previous tracker filing (docket D2012.5.49) for the 2012/13 period.

MCC-048 Regarding: 2012/2013 Lost Revenue Adjustment
Witness: Frank V. Bennett

Please provide a detailed explanation of the DSM Lost Revenue Adjustment of - \$16,341 for the month of June 2013, line 121 of your Exhibit__(FVB-1)12-13 Updated, page 4 of 5.

MCC-049 Regarding: 2012/2013 CU4 Tracking Period
Witness: Frank V. Bennett

Please provide a detailed explanation of the DSM Lost Revenue Adjustment of - \$34,821 for the month of June 2013, line 52 of your Exhibit__(FVB-4)12-13 Updated, page 2 of 2.

MCC-050 Regarding: 2012/2013 DGGGS Tracking Period
Witness: Frank V. Bennett

Please provide a detailed breakdown and description (and supporting documentation) for each of the monthly entries for DGGGS Fuel Cost, Energy Supply Cost and Revenue Credits shown on lines 49, 51 and 68 respectively of your Exhibit__(FVB-6)12-13 Updated, page 2 of 2, including quantity and price.

MCC-051 Regarding: 2012/2013 DGGGS Tracking Period
Witness: Frank V. Bennett

Please provide a detailed explanation of the DSM Lost Revenue Adjustment of \$73,584 for the month of June 2013, line 82 of your Exhibit__(FVB-6)12-13 Updated, page 2 of 2.

MCC-052 Regarding: Basin Creek Operating Protocol
Witness: Kevin J. Markovich

In reference to your 2014 testimony at page KJM-6, lines 1-6:

- a) Please provide in electronic format with all links intact Basin Creek's economic dispatch for the most recent 36 months available.
- b) Please provide all documents produced by or produced for Northwestern relating to the analysis of Basin Creek generation resource operating protocol ordered by Commission's Order No. 7219h.

MCC-053 Regarding: Basin Creek Operating Protocol
Witness: Kevin J. Markovich

Please explain whether the renewable capacity described in your 2014 testimony at page KJM-6, lines 8-17, as well as the additional CREP resources NWE expects to solicit in a 2014 RFP, are part of the 239 MW potential RPS contracts you mentioned in your 2013 testimony at page KJM-8 in this docket.

MCC-054 Regarding: June 2013 RFP
Witness: Kevin J. Markovich

In reference to your 2014 testimony at page KJM-8, lines 1-4, please provide a table showing the results of the completed June 2013 Request for Proposal process, showing description of the products offered, type, provider, quantity, price, period, and whether the specific product was contracted by NorthWestern or not.

MCC-055 Regarding: Colstrip Unit 4 Outage
Witness: Kevin J. Markovich

In your 2014 testimony at pages KJM-9 and KJM-10, you state: “During the almost seven-month outage, NorthWestern used market purchases and its Basin Creek generating resource to replace the lost production.” Please provide a break down of the daily replacement MWhs provided by Basin Creek during this seven months outage.

MCC-056 Regarding: Colstrip Unit 4 Outage
Witness: Kevin J. Markovich

In reference to your statement at page KJM-10, lines 15-17 of your 2014 testimony: “... mainly during low load times, customers benefitted from not having the Colstrip generation as NorthWestern did not have to sell excess supply off system.”

- a) Please explain in more detail why not having the Colstrip generation (and off system revenues therefrom) during low load times is a benefit to customers.
- b) Please provide in electronic format the hourly MWhs that had to be replaced due to the outage.

MCC-057 Regarding: Colstrip Unit 4 Outage
Witness: Kevin J. Markovich

Has NorthWestern been able to identify whose responsibility the CU4 outage is, and whether NorthWestern can pursue any actions to recover all or part of the cost incurred by the outage? If Northwestern has not explored the possibility of identifying responsibility for the outage, please explain in detail why not. Also if

NWE has in its possession any reports, analysis or documents performed by other parties that have looked at responsibility for the outage, please provide them.

MCC-058 Regarding: Colstrip Unit 4 Outage

Witness: Kevin J. Markovich

Please explain in detail what Northwestern's position is regarding who should pay for the costs caused by the outage. If the costs should be shared, please identify the parties that should share the costs and the share that each should bare of the cost caused by the outage.

MCC-059 Regarding: Colstrip Unit 4 Outage

Witness: Kevin J. Markovich

Has NorthWestern been able to recover any of the cost of the outage through any type of insurance? Please provide a detailed response; including all efforts NorthWestern has pursued to minimize the cost of the outage to ratepayers.

MCC-060 Regarding: Table 1

Witness: William M. Thomas

Table 1 of your 2014 testimony shows how Electric Supply DSM program expenditures have been increasing as the total reported aMWs have increased for Program Year 1 to 8. However, in Program Year 9 (2012-13) and Year 10 (2013-14) Reported Program Results (aMW) are lower than the previous three years but Electric Supply DSM Expenditures are higher for those years. Please explain in detail the reasons why year expenditures for 2012-2013 and 2013-2014 are higher when reported results are lower than in previous years.

MCC-061 Regarding: Reported Electric Savings from 2013/14

Witness: William M. Thomas

Please provide an electronic working copy, with all links intact, of the most recent updated version of 2014 Exhibit__(WMT-1), including all workpapers.

MCC-062 Regarding: Residential and Commercial Electric Savings
Witness: William M. Thomas

Please explain in detail how the percentage split between each of the residential and commercial DSM resources that were acquired in the 2013-2014 Program Year, as shown on Table B of your 2014 Exhibit__(WMT-1), have been estimated. Please provide all supporting documents, workpapers and calculations.

MCC-063 Regarding: E+ Commercial DSM Programs
Witness: William M. Thomas

In your 2014 testimony at pages WMT-15-16 you list the five firms working to acquire commercial sector DSM and the respective accomplishment to date. Please provide for each of the firms, the name and a brief description of each of these projects.

MCC-064 Regarding: DSM Program Spending & Budget
Witness: William M. Thomas

Please provide an electronic working copy, with all links intact, of the most recent updated version of your 2014 Exhibit__(WMT-2), including all data, workpapers and supporting spreadsheets.

MCC-065 Regarding: DSM Program Spending & Budget
Witness: William M. Thomas

Please explain in detail why the February 2014 Spending for E+ Commercial Lighting Program (line 9, column J of your 2014 Exhibit__(WMT-2)) is very low compared to all other months in the 2013-2014 tracker year.

MCC-066 Regarding: DSM Program Spending & Budget
Witness: William M. Thomas

Please explain in detail why the March 2014 Spending for E+ Commercial Electric Rebate Program (line 12, column K of your 2014 Exhibit__(WMT-2)) is much higher than the spending for all other months in the 2013-2014 tracker year.

MCC-067 Regarding: Electric DSM Lost Revenues
Witness: William M. Thomas

Please provide an updated version of your 2014 Exhibit__(WMT-3), with the most current information available, replacing the estimated three months with actual data in the tracker period 2013-2014. Please provide this updated exhibit in electronic working form, with all links intact, including all workpapers.

MCC-068 Regarding: Electric DSM Lost Revenues
Witness: William M. Thomas

In reference to your 2014 testimony at page WMT-31, lines 4-12, please provide for each tracker year from 2004-2014 the following information:

- a) MWhs throughput and total dollar amount that were used to set T&D rates.
- b) The actual dollar amount collected from T&D rates.
- c) MWhs used in calculating Electric DSM Lost Revenues associated with T&D.
- d) The actual dollar amount collected as DSM Lost Revenues for T&D.

MCC-069 Regarding: Electric DSM Lost Revenues
Witness: William M. Thomas

In reference to your 2014 testimony at pages WMT-31, lines 16-22 please provide a comparative table for each tracker year from 2009-2014 showing:

- a) MWhs throughput and total dollar amount that were used to set CU4 rates.
- b) The actual dollar amount collected from CU4 rates.
- c) MWhs used in calculating Electric DSM Lost Revenues associated with CU4.
- d) The actual dollar amount collected as DSM Lost Revenues for CU4.

MCC-070 Regarding: Electric DSM Lost Revenues
Witness: William M. Thomas

In reference to your 2014 testimony at page WMT 32, lines 3-10, please provide a comparative table for each tracker year from 2012-2014 showing:

- a) MWhs throughput and total dollar amount that were used to set DGGS rates.
- b) The actual dollar amount collected from DGGS rates.
- c) MWhs used in calculating Electric DSM Lost Revenues associated with DGGS.
- d) The actual dollar amount collected as DSM Lost Revenues for DGGS.

MCC-071 Regarding: Electric DSM Lost Revenues
Witness: William M. Thomas

In reference to your 2014 testimony at page WMT 32, lines 14-21, please provide for each tracker year from 2013-2014 the following information:

- a) MWhs throughput and total dollar amount that were used to set Spion Kop rates.
- b) The actual dollar amount collected from Spion Kop rates.
- c) MWhs used in calculating Electric DSM Lost Revenues associated with Spion Kop.
- d) The actual dollar amount collected as DSM Lost Revenues for Spion Kop.

MCC-072 Regarding: Electric DSM Lost Revenues
Witness: William M. Thomas

The most recent T&D rates were established on January 1, 2011 in Docket D2009.9.129, using annual base revenues for T&D of about \$228.6 million. From January 1, 2011, DSM Lost Revenues associated with T&D have been \$0.866 million from January to June 2011, \$2.307 million for the 2011-2012 tracker

period, \$4.08 million for the 2012-2013 tracker period, and currently \$5.949 million for 2013-2014 tracker period; resulting in a total of about \$13.2 million in 42 months.

- a) Please provide the actual dollar amount that NWE has collected as T&D revenues during these 42 months.
- b) Also provide a complete explanation and justification for claiming that NWE has lost about \$13.2 million in T&D revenues due solely to DSM and that none of this reduction has been attributable to other factors such as behavioral changes over time that are not directly the result of the Company's DSM activities (e.g., behavioral changes such as those noted in MCC-37), or from reduced loads from non-active customers.

MCC-073 Regarding: Electric DSM Lost Revenues
Witness: William M. Thomas

The CU4 rates were established in Docket D2009.12.155, using annual base revenues of about \$72.746 million. According to Mr. Janhunen's Exhibit__(JSJ-6)14-15, page 4 of 5, it is estimated that Fixed CU4 Revenues in 2013-14 will be \$75.995 million (line 39, column H), about 4.5% (\$3.25 million) more than approved revenues. In your 2014 Exhibit__(WMT-3) page 1, it is estimated that DSM Lost Revenues associated with CU4 for 2014-15 Tracker period will be \$3.892 million. Please provide a detailed justification of why NWE should be entitled to collect an additional 5.35% (\$3.892 million) above approved revenue requirements for CU4 due to Lost Revenues.

MCC-074 Regarding: Electric DSM Lost Revenues
Witness: William M. Thomas

Current DGGS rates were established in Order 6943e, using revenues for fixed cost (80% allocation) of about \$28.2345 million. According to Mr. Janhunen's Exhibit__(JSJ-6)14-15, page 4 of 5, it is estimated that Fixed DGGS Revenues in 2013-14 will be \$28.617 million (line 39, column L), about 1.35% (\$0.38 million) more than approved revenues. In your 2014 Exhibit__(WMT-3) page 1, it is estimated that DSM Lost Revenues associated to DGGS for 2014-15 Tracker period will be \$1.019 million. Please provide a detailed justification of why NWE should be entitled to collect an additional 3.61% (\$1.019 million) above approved revenue requirements for DGGS due to Lost Revenues.

MCC-075 Regarding: Update to 2013/2014 Supply Tracker
Witness: Frank V. Bennett

You state in your 2014 testimony at page FVB-5, lines 1-2 that NorthWestern has included the CU4 full rate-based volume of unit contingent energy associated with 222 megawatts (“MW”) of capacity in the tracker.

- a) Please explain in detail why it is reasonable to include the full volume of CU4 for the months during the outage when CU4 generation was zero instead of including only 111 MW received from Colstrip Units 3 & 4, and the rest included as market purchases and Basin Creek generation as stated in Mr. Markovich’s 2014 testimony at pages KJM-9 and KJM-10.
- b) Please provide the monthly load factor used in the calculation of Colstrip 4 generation output as show on line 26 of your Exhibit__(FVB-1)13-14, page 3 of 5.

MCC-076 Regarding: 2013/2014 Default Supply Tracking Period
Witness: Frank V. Bennett

Please provide an electronic working copy of Exhibit__(FVB-1)13-14, with all links intact, including all workpapers. If actual data for the months of April to June 2013 are available, please provide the updated exhibit.

MCC-077 Regarding: 2013/2014 Off-System Transactions
Witness: Frank V. Bennett

Please provide all supporting documents, workpapers and calculations for the Off System Transactions: Fixed Price totaling \$60,935,659 and Index Price totaling \$43,852,514, during the 2013/2014 default supply tracking period, indicating quantity, price, month, and name of counter party for each sale and purchase.

MCC-078 Regarding: 2013/2014 Off-System Transactions
Witness: Frank V. Bennett

In your 2014 testimony at page FVB-8, lines 12-13, you state “Most of these transactions [off-system] are at the Mid-Columbia trading hub and are used for hedging purposes.” Please identify each of these transactions that are used for

hedging purposes, including quantity, price, period and supplier.

MCC-079 Regarding: 2013/2014 On-System Transactions
Witness: Frank V. Bennett

Please provide all supporting documents, workpapers and calculations for the On System Transactions: Base Fixed Price totaling \$150,118,008 and Index Price totaling \$66,757,571, during the 2013/2014 default supply tracking period, indicating quantity, price, month, and name of resource or counter party for each sale and purchase.

MCC-080 Regarding: 2013/2014 On-System Transactions
Witness: Frank V. Bennett

In your 2014 testimony at page FVB-11, lines 1-4, you state that the second group of variable energy includes 14 MW of generation under which the associated RECs remain with the QF (United Materials of Great Falls, plus other QFs). Also, on page FVB-5 you state: *“NorthWestern reduced regulation costs associated with wind energy contracts that do not serve retail load. Accordingly, NorthWestern removed all associated wind regulation charges for the UMGF project from the 2005/2006 tracker period forward for the periods of time that NorthWestern was not purchasing the output from this facility.”*

- a) Please provide the quantity and cost associated only with UMGF.
- b) Please explain whether this energy is related to the wind energy contract and the regulation cost associated with UMGF discussed in your 2014 testimony at page FVB-5, lines 17-24 and FVB-6, lines 1-4.
- c) Is the output from UMGF part of the variable energy that you refer to at FVB-5 that does not serve retail loads? Please fully explain your answer and reconcile the two statements (at FVB-11 and FVB-5) referred to above.

MCC-081 Regarding: 2013/2014 Administrative Expense
Witness: Frank V. Bennett

Please provide all documents supporting the \$2,248,317 in Administration as shown on page 1 of Exhibit__(FVB-1)13-14, line 43.

MCC-082 Regarding: 2013/2014 Basin Creek
Witness: Frank V. Bennett

Please explain in detail the reasons why Basin Creek's output for September 2013 was 5,189 MWhs at a monthly variable cost of \$497,509 while the output for October 2013 was 8,575 Mwhs at a lower monthly variable cost of \$190,060 (lines 52 and 112 of Exhibit__(FVB-1)13-14, pages 3 and 4).

MCC-083 Regarding: 2013/2014 Basin Creek Fixed Costs
Witness: Frank V. Bennett

Please explain in detail the reasons why the fixed costs of Basin Creek in October and November 2013 and the estimated costs for May 2014 are much higher than the costs in the other months.

MCC-084 Regarding: 2013/2014 Competitive Solicitations Transactions
Witness: Frank V. Bennett

Please provide more details regarding the competitive solicitations listed on line 33 of your Exhibit__(FVB-1)13-14, page 3 of 5, including the supplier, quantity, period and cost. Also please explain why during the 2013/2014 tracker year, the month of November 2013 reports 10,000 MWhs (about half the volumes for the other months) at a cost of \$108.05 per MWh, while in all other months the unit cost was \$54.03 per MWh.

MCC-085 Regarding: 2013/2014 Transmission Cost
Witness: Frank V. Bennett

Please provide all documents and calculations supporting the transmission cost of \$710,406 for the 2013/2014 default supply tracking period, including the most updated transmission costs as they become available.

MCC-086 Regarding: 2013/2014 Lost Revenue Adjustment
Witness: Frank V. Bennett

Please provide a detailed explanation of the DSM Lost Revenue Adjustment for the months of November, December 2013 and estimated June 2014 netting \$110,668, line 117 of your Exhibit__(FVB-1)13-14, page 4 of 5.

MCC-087 Regarding: Table At FVB-15
Witness: Frank V. Bennett

Please update the table at page FVB-15 of your 2014 testimony to reflect actual results for 2013/2014 through the most recent month for which actual data are available.

MCC-088 Regarding: Table At FVB-15
Witness: Frank V. Bennett

Please provide versions of the table at FVB-15 reflecting actual results for each of the NorthWestern tracker periods 2010/2011, 2011/2012 and 2012/2013.

MCC-089 Regarding: 2014/2015 Default Supply Tracking Period
Witness: Frank V. Bennett

Please provide an electronic working copy of Exhibit__(FVB-2)14-15, with all links intact, including all workpapers.

MCC-090 Regarding: 2014/2015 Off-System Transactions
Witness: Frank V. Bennett

Please provide all supporting documents, workpapers and calculations for the Off System Transactions: Base Fixed Price Purchases Competitive Solicitations totaling \$43,250,700, Term Fixed Price Purchases totaling \$21,519,269, Base Index Price Sales Competitive Solicitations totaling (\$12,928,507), Term Index Price Sales totaling (\$18,044,207), and Spot Sales totaling (\$27,322,192) for estimated July 2014 through June 2015, stating the name(s) of counter parties, quantities, total costs, and average prices for each sale and/or purchase, in each month during that period of time.

MCC-091 Regarding: Update of Table At FVB-18
Witness: Frank V. Bennett

Please provide an update of the table at FVB-18 of your 2014 testimony reflecting actual results through the most recent month in 2014 for which actual data are available, indicating which months are from actual results.

MCC-092 Regarding: 2014-15 Tracker Year Billing Statistics
Witness: Joseph S. Janhunen

Please provide an electronic working copy, with all links intact, of Exhibit__(JSJ-1)14-15, including all workpapers.

MCC-093 Regarding: 2014-15 Tracker Year Billing Statistics
Witness: Joseph S. Janhunen

In your 2014 testimony at page JSJ-6, lines 5 to 18, you state that column F of Table 4 of Exhibit__(JAJ-1)14-15 shows changes to the Residential and DS-1 Secondary Classes as a result of their forecasted usage. You also state that these changes reflect the effects of normal weather, customer growth, and demand-side management activities for these groups. Please provide more details and a breakdown of these changes by each cause (e.g., weather, customer growth, DSM, etc).

MCC-094 Regarding: Deferred Supply Rates
Witness: Joseph S. Janhunen

Please provide an electronic working copy, with all links intact, of Exhibit__(JSJ-2)14-15, including all workpapers.

MCC-095 Regarding: Rebate Rates
Witness: Joseph S. Janhunen

Please explain the reason why the estimated rebates for the Irrigation Class in the months of May and June 2014 are \$11,874 and \$19,295 respectively as compared to almost nothing in the months of January to April 2014, as shown on Exhibit__(JSJ-2)14-15, page 8 of 8. Also, please provide an updated exhibit with actual values for the months of May and June 2014.

MCC-096 Regarding: CU4 Derivation of Rates
Witness: Joseph S. Janhunen

Please provide an electronic working copy, with all links intact, of Exhibit__(JSJ-3)14-15, including all workpapers.

MCC-097 Regarding: DGGS Derivation of Rates
Witness: Joseph S. Janhunen

Please provide an electronic working copy, with all links intact, of Exhibit__(JSJ-4)14-15, including all workpapers.

MCC-098 Regarding: Spion Kop Derivation of Rates
Witness: Joseph S. Janhunen

Please provide an electronic working copy, with all links intact, of Exhibit__(JSJ-5)14-15, including all workpapers.

MCC-099 Regarding: Supply Rates
Witness: Joseph S. Janhunen

Please provide an electronic working copy, with all links intact, of Exhibit__(JSJ-6)14-15, including all workpapers.

MCC-100 Regarding: 2013/2014 CU4 Tracking Period
Witness: Frank V. Bennett

Please provide an electronic working copy of Exhibit__(FVB-4)13-14, with all links intact, including all workpapers. If actual data for the months of April, May and June 2014 are available, please provide the updated exhibit.

MCC-101 Regarding: 2013/2014 CU4 Tracking Period
Witness: Frank V. Bennett

Since Colstrip Unit 4 was offline from July 1, 2013 through January 23, 2014:

- a) Please provide a detailed explanation of what the Fuel cost in the variable cost calculation (line 47, Exhibit__(FVB-4)13-14, page 2 of 2) represents for those months that CU4 was offline.
- b) Please explain how many MWhs are related to each monthly fuel cost during CU4 outage.

MCC-102 Regarding: 2013/2014 CU4 Tracking Period
Witness: Frank V. Bennett

Please provide a detailed explanation of the DSM Lost Revenue Adjustment netting \$27,575 for the months of November and December 2013 and estimated June 2014, line 52 of your Exhibit__(FVB-4)13-14, page 2 of 2.

MCC-103 Regarding: 2014/2015 CU4 Tracking Period
Witness: Frank V. Bennett

Please provide an electronic working copy of Exhibit__(FVB-5)14-15, with all links intact, including all workpapers.

MCC-104 Regarding: CU4 DSM Revenue Rebate
Witness: Joseph S. Janhunen

Please explain the reason why the estimated rebates for the Irrigation Class in the months of May and June 2014 are \$5,706 and \$9,273 respectively compared to almost nothing in the months of January to April 2014, as shown on Exhibit__(JSJ-3)14-15, page 8 of 8. Also, please provide an updated exhibit with actual values for the months of May and June 2014.

MCC-105 Regarding: 2013/2014 DGGGS Tracking Period
Witness: Frank V. Bennett

Please provide an electronic working copy of Exhibit__(FVB-6)13-14, with all links intact, including all workpapers. If actual data for the months of April, May and June 2014 are available, please provide the updated exhibit.

MCC-106 Regarding: 2013/2014 DGGS Tracking Period
Witness: Frank V. Bennett

Please provide a detailed explanation of the \$(64,522) in the month of estimated May 2014 labeled as MPSC-Related Fuel Adjustment (line 56, Exhibit__(FVB-6)13-14, and provide detailed workpapers showing its calculation.

MCC-107 Regarding: 2013/2014 DGGS Tracking Period
Witness: Frank V. Bennett

Please explain in detail why the \$(1,419,172) Regulation Adjustment Order 7283 (line 64, Exhibit__(FVB-6)13-14) was not accounted for prior to estimated April 2014 even though Interim Order 7283 was effective for service rendered on and after July 1, 2013.

MCC-108 Regarding: 2013/2014 DGGS Tracking Period
Witness: Frank V. Bennett

Please provide a detailed breakdown of each of the monthly entries for DGGS Fuel Cost, Revenue Credits (27 MW Supply/Tran) shown on lines 49 and 70 respectively of your Exhibit__(FVB-6)13-14, page 2 of 2, including quantity, price, and any other supporting materials.

MCC-109 Regarding: 2014/2015 DGGS Tracking Period
Witness: Frank V. Bennett

Please provide an electronic working copy of Exhibit__(FVB-7)14-15, with all links intact, including all workpapers.

MCC-110 Regarding: DGGS DSM Revenue Rebate
Witness: Joseph S. Janhunen

Please explain the reason why the estimated rebates for the Irrigation Class in the months of May and June 2014 are \$620 and \$1,007 respectively compared to small negative values in the months of January to April 2014, as shown on Exhibit__(JSJ-4)14-15, page 7 of 7. Also, please provide an updated exhibit with actual values for the months of May and June 2014.

MCC-111 Regarding: 2013/2014 Spion Kop Tracking Period
Witness: Frank V. Bennett

Please provide an electronic working copy of Exhibit__(FVB-8)13-14, with all links intact, including all workpapers. If actual data for the months of April, May and June 2014 are available, please provide the updated exhibit.

MCC-112 Regarding: 2013/2014 Spion Kop Tracking Period
Witness: Frank V. Bennett

Please provide a detailed explanation of the DSM Lost Revenue Adjustment totaling \$18,029 for the tracker year July 2013 to June 2014, line 53 of your Exhibit__(FVB-8)13-14, page 2 of 2.